

**REDACTED**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida  
Competitive Carriers Association  
Against BellSouth Telecommunications, Inc.  
Regarding BellSouth's Practice of Refusing  
To Provide FastAccess Internet Service to  
Customers who Receive Voice Service from a  
Competitive Voice Provider and Request for  
Expedited Relief.

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Docket No. 020507-TP

**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S RESPONSES TO  
BELLSOUTH TELECOMMUNICATIONS, INC.'S FOURTH SET OF  
INTERROGATORIES (NOS. 68 - 72)**

The Florida Competitive Carriers Association (FCCA), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.280(b) and 1.340, Florida Rules of Civil Procedure, hereby provides the following Responses to BellSouth Telecommunications, Inc.'s Fourth Set of Interrogatories (Nos. 68 - 72). In providing these responses, the FCCA does not waive and incorporates herein all of its objections, filed on January 13, 2003, to BellSouth's Fourth Set of Interrogatories.

**INTERROGATORIES**

**INTERROGATORY NO. 68:** For each Interrogatory, identify the person or persons providing information in response thereto.

**RESPONSE:** Sherry Lichtenberg, Gram Meadors, and Larry Rogers provided the information in the FCCA's response to Interrogatory No. 69. Sherry Lichtenberg provided the information in the FCCA's response to Interrogatory Nos. 70-72.

**INTERROGATORY NO. 69:** In connection with Georgia Docket 11901-U, in MCI's responses to BellSouth's Second Interrogatories (Public Disclosure Version), MCI reported that WorldCom Inc. currently offers fixed broadband services to residential and business customers in markets that include Pensacola, Florida and Tallahassee, Florida. (Response to 61, Public Disclosure Version). At page 2 of Ms. Lichtenberg's testimony, she states that "When customers have the option of migrating to a competitive provider for voice service and losing FastAccess, or staying with BellSouth for voice service and keeping their DSL service, customers decide to retain FastAccess." With regard to this statement please:

- a. State whether "customers [that] want to migrate to MCI in order to take advantage of The Neighborhood 'all distance' voice package" are offered WorldCom's fixed broadband service, where available;

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- b. If “customers [that] want to migrate to MCI in order to take advantage of The Neighborhood ‘all distance’ voice package” are not offered WorldCom’s fixed broadband service, where available, describe with particularity why not.
- c. Describe with particularity the nature of the fixed broadband services offered in Pensacola and Tallahassee; including (i) the numbers of business and residential customers receiving such service; (ii) the description of the protocols used to provide the fixed broadband services; (iii) how long the fixed broadband services have been offered in Florida;
- d. Does MCI offer DSL service anywhere in Florida other than Pensacola and Tallahassee; if yes, describe with particularity the nature of the DSL service, the numbers of customers receiving such service, and how long the service has been offered in Florida.
- e. If MCI maintains that it is exiting the DSL business in Florida please explain with particularity the reasons why MCI is exiting the business.

**RESPONSE:**

- a. No. MCI does not offer fixed broadband service in conjunction with its Neighborhood products.
- b. As an initial matter, MCI notes Tallahassee is in Sprint’s service territory (where MCI currently does not offer residential service), so the only area in BellSouth’s Florida service territory where WorldCom offers fixed broadband services is Pensacola. WorldCom’s fixed broadband has been deployed on a limited, trial basis and WorldCom is currently attempting to sell that business. It would make little sense to undertake the operational, sales and marketing changes that would be required to offer a package of residential voice service and fixed broadband service under these circumstances, where the wireless broadband business: (i) has been in the developmental stages; (ii) is offered only in one relatively small area in BellSouth’s service area; and (iii) and is being offered for sale.
- c. As of September 2002, WorldCom had ■ business and ■ residential fixed wireless customers in Florida. WorldCom launched fixed wireless service in the Pensacola and Tallahassee markets in December 2001. Fixed wireless service provides wireless access to the internet using multichannel multipoint distribution service technology.
- d. WorldCom offers DSL service in Miami Florida to business customers. Based on MCI’s investigation to date, WorldCom began offering DSL service in Miami in November 2001 and currently has approximately ■ DSL customers there. MCI is continuing to seek information in response to this interrogatory and will supplement this response if appropriate.

- e. MCI does not claim that WorldCom is exiting the DSL business in Florida, but rather that it is attempting to sell its fixed wireless business. WorldCom is attempting to do so because, having engaged in a comprehensive review of its operations as part of its bankruptcy reorganization, WorldCom has developed a business strategy to focus on its "core" businesses.

**INTERROGATORY NO. 70:** At page 3, lines 18 – 20, of the rebuttal testimony of Sherry Lichtenberg, she refers to 5,233 rejects “because the customer had FastAccess service.” State how many of the 5,233 rejects related to customers in Pensacola, Florida.

**RESPONSE:** There were 91 PONs for Pensacola, Florida customers for which rejects were received. Note that in some cases more than one PON was submitted for the same telephone number. WorldCom is researching the number of rejects for Pensacola customers and will supplement this response to provide that number.

**INTERROGATORY NO. 71:** At page 3, line 3 –4, of the rebuttal testimony of Sherry Lichtenberg, she states “customers sign up for service because they wanted a high speed data service.” At page 3, lines 22 – 23 of the rebuttal testimony of Sherry Lichtenberg she states “MCI customer representatives are trained to ask prospective customers Worldcom’s fixed broadband services. If not, describe with particularity why not.

**RESPONSE:** MCI customer representatives are not trained to offer prospective customers WorldCom’s fixed broadband services for the reasons stated in response to Interrogatory No. 69b.

**INTERROGATORY NO. 72:** At page 4 of the rebuttal testimony of Sherry Lichtenberg, she states that the “5,233 rejects MCI has received . . . only reflects those instances in which the MCI representative presumably was not informed by the customer that the customer has FastAccess, not the instances in which the MCI representative did not submit a local service request at all because the customer decided not to migrate because he or she has FastAccess.” With regard to this statement:

- a. State how many customers did not migrate to MCI because he or she had FastAccess:
- b. If MCI does not know the number of customers that did not migrate to MIC because he or she had FastAccess, state with particularity why not;
- c. What training, if any, did MCI perform to enable its customer service representatives to track the numbers of customers that did not migrate to MCI;
- d. If MCI did not train its customer service representatives to track the numbers of customers that did not migrate to MCI because such customers had FastAccess, describe with particularity why not.

**RESPONSE:**

- a. MCI does not track the number of customers that do not migrate to MCI because they have FastAccess service.
- b. MCI customer representatives do not track the number of customers who choose not to migrate to MCI or the reasons they choose not to do so. Such tracking would take away time from the representatives' principal role, which is selling MCI service to potential customers.
- c. MCI customer representatives do not receive such training.
- d. See response to subpart b.



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**CERTIFICATE OF SERVICE**

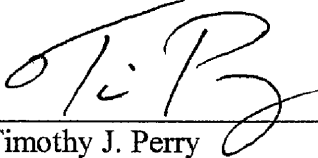
I **HEREBY CERTIFY** that a true and correct copy of the foregoing Responses to BellSouth Telecommunications, Inc.'s Fourth Set of Interrogatories (Nos. 68 - 72) have been furnished by (\*) hand delivery, (\*\*) electronic mail, or U. S. Mail this 23rd day of January 2003, to the following:

(\*) (\*\*) Patricia Christensen  
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Timothy J. Perry

PUBLIC VERSION

Request to Produce Nos. 9 and 12

Entire Response Confidential