



### ORIGINAL

February 17, 2003

Ms. Blanca Bayó, Director Division of the Commission Clerk & Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

via Overnight Mail

Re: Docket No. 020119 - Petition for Expedited Review and Cancellation Of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs and For an Investigation Of BellSouth's Promotional Pricing And Marketing Practices by Florida Digital Network, Inc.

Re: Docket No. 020578 - Petition of the Florida Competitive Carriers Association for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs.

Re: Docket No. 020578-TP Petition of the Florida Competitive Carriers Association for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs.

Dear Ms. Bayó,

General Counsel

LOCAL

AUS CAF CMP	Burch	substitute for Exhibit No. (MPG-1). The original Exhibit No. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, which is pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, with the pre-filed direct testimony of Mr. Michael P. October 23, 2002, which the pre-filed direct testimony of Mr. Michael P. October 23, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the pre-filed direct testimony of Mr. Michael P. October 24, 2002, which the	(MPG-1) was filed on
	5+00	othe exhibit was filed on November 7, 2002.	
CTR ECR GCL OPC		The attached substitute exhibits revises and replaces the original and the copy of this letter and the attachment has been sent to all of the parties and	November 7 versions. A nd staff.
MMS SEC OTH	Wafts	If you have any questions regarding this letter or the one attached, please 0460.	e call me at 407-835-
		Sincerely,  Matthew Feil	
		Florida Digital Network	03 150

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Expedited Review
and Cancellation of BellSouth

Telecommunications, Inc.'s Key Customer
Promotional Tariffs and For an
Investigation Of BellSouth's Promotional
Pricing And Marketing Practices by
Florida Digital Network, Inc.

In Re: Petition for Expedited Review
and Cancellation of BellSouth
Telecommunications, Inc.'s Key Customer

Docket No. 020119-TP

Promotional Tariffs by the Florida Competitive Carrier's Association

### **REVISED EXHIBIT MPG-4**

### FILED WITH THE DIRECT TESTIMONY OF MICHAEL P. GALLAGHER

# <u>FILED ON BEHALF OF</u> FLORIDA DIGITAL NETWORK, INC.

DOCUMENT NUMBER-CATE
01628 FEB 188

FPSC-COMMISSION CLERK

# Retail ALLAPATTAH - MIAMFLAL (RG12) - ZONE 1

#### **BellSouth Tariff-Customer**

Business lines x 3 lines Hunting x 3 lines Total MRC:	\$110.85 \$30.00 <b>\$140.85</b> \$80.00	Per line: <u>\$46.95</u>	vs Key Customer Percentage Diff	\$17.39 58.83%
FDN Tariff-Customer* Business lines x 3 lines Hunting x 3 lines Total MRC:	\$88.68 \$22.50 <b>\$111.18</b>	Per line: <b>\$37.06</b>	vs Key Customer Percentage Diff	\$7.50 25.37%
BellSouth Key Customer** Business lines x 3 lines Hunting x 3 lines Total MRC:	\$88.68 \$0.00 <b>\$88.68</b>	Per line: <b>\$29.56</b>		

<sup>\*</sup>Customer signs a 36 month commitment with Florida Digital Network.

<sup>\*\*</sup>Customer signs a 36 month commitment with BellSouth.

## ALLAPATTAH - MIAMFLAL (RG12) - ZONE 1

FDN Resale-Standard

\$92.22 Business lines x 3 lines \$24.96 Hunting x 3 lines

\$117.17 Total MRC:

\$39.06 Per line:

vs Key Customer Percentage Diff

\$9.50 32.13%

FON Resale-Key Customer Business lines x 3 tines

\$73.77

Hunting x 3 lines Total MRC:

\$0.00 \$73.77

Per line:

\$24.59

vs Key Customer

-\$4.97

-16.81% Percentage Diff

FDN UNE Pizone 1

Total MRC:

\$65.46

Per line:

vs Key Customer Percentage Diff

-\$2.77 -11.27%

### ALLAPATTAH - MIAMFLAL (RG12) - ZONE 2

FDN UNE-P-Zone 2\*\*\*

Total MRC:

\$73.05

Per line:

vs Key Customer Percentage Diff

-\$0.24 -0.98%

<sup>\*\*\*</sup>Includes features, usage, SL-1 / SL-2 NRC, and SOMEC.

### Retail HAVERHILL - WPBHFLHH (RG 9) - ZONE 2

BellSouth Tariff-Customer				, ,	
	\$110.85				
	\$30.00 \$140.85	Per line:	\$46.95	vs Key Customer Percentage Diff	\$17.39 58.83%
Total NRC:	\$80.00			r crocmage Din	30.0076
FDN Tariff-Customer*					
Business lines x 3 lines	\$88.68				
	\$22.50				
Total MRC:	\$111.18	Per line:	\$37.06	vs Key Customer	\$7.50
Total NRC:	\$150.00			Percentage Diff	25.37%
BellSouth Key Customer**					
Business lines x 3 lines	\$88.68				
Hunting x 3 lines	\$0.00				
Total MRC:	\$88.68	Per line:	\$29.56		
Total NRC:	\$0.00				

<sup>\*</sup>Customer signs a 36 month commitment with Florida Digital Network

<sup>\*\*</sup>Customer signs a 36 month commitment with BellSouth.

	Who HAVERHILL - WPBH	olesale FLHH (RG 9) - ZON	E 2
Business lines x 3 lines \$92.22 Hunting x 3 lines Total MRC: \$117.17	Per line: \$39.06	vs Key Customer Percentage Diff	\$9.50 32.13%
Business lines x 3 lines \$73.77 Hunting x 3 lines Total MRC: \$73.77	Per line: <b>\$24.59</b>	vs Key Customer Percentage Diff	-\$4.97 -16.81%
Total MRC: \$77.88	Per line: \$25.96	vs Key Customer Percentage Diff	\$1.37 5.57%
	HAVERHILL - WPBI	IFLHH (RG 9) - ZON	IE 2
FDN UNE-P-Zone 2*** Total MRC: \$73.05	Per line: \$24.35	vs Key Customer	-\$0.24

Percentage Diff

-0.98%

<sup>\*\*\*</sup>Includes features, usage, SL-1 / SL-2 NRC, and SOMEC.

### Retail PORT ST. LUCIE MAIN - PTSLFLMA (RG6) - ZONE 2

BellSouth Tariff-Customer			,	
Business lines x 3 lines Hunting x 3 lines Total MRC:	\$98.85 \$30.00 <b>\$128.85</b> \$80.00	Per line: \$42.95	vs Key Customer Percentage Diff	\$16.59 62.94%
FDN Tariff-Customer* Business lines x 3 lines Hunting x 3 lines	\$79.08 \$22.50			
Total MRC: Total NRC:	\$101.58 \$150.00	Per line: \$33.86	vs Key Customer Percentage Diff	\$7.50 28.45%
BellSouth Key Customer**				
Business lines x 3 lines Hunting x 3 lines	\$79.08 \$0.00			
Total MRC:	\$79.08	Per line: \$26.36		
Total NRC:	\$0.00			

<sup>\*</sup>Customer signs a 36 month commitment with Florida Digital Network.

<sup>\*\*</sup>Customer signs a 36 month commitment with BellSouth.

#### PORT ST. LUCIE MAIN - PTSLFLMA (RG6) - ZONE 2

FDN Resale-Standard

Business lines x 3 lines \$82.23

Hunting x 3 lines \$24.96

Total MRC: \$107.19 Per line: \$35.73 vs Key Customer

Percentage Diff 35.55%

\$9.37

-\$4.43

FDN Resale-Key Customer

Business lines x 3 lines \$65.79 Hunting x 3 lines \$0.00

Total MRC:

\$0.00 **\$65.79** Per fine

Per line: \$21.93 vs Key Customer

Percentage Diff -16.81%

FDNUNESPZOTE 2\*\*

 Total MRC:
 \$77.88
 Per line:
 \$25.96
 vs Key Customer
 \$4.03

 Percentage Diff
 18.38%

PORT ST. LUCIE MAIN - PTSLFLMA (RG6) - ZONE 3

FDN UNE-P-Zone 3\*\*\*

 Total MRC:
 \$105.30
 Per line:
 \$35.10
 vs Key Customer
 \$13.17

 Percentage Diff
 60.06%

\*\*\*includes features, usage, SL-1 / SL-2 NRC, and SOMEC.

### Retail MAGNOLIA - ORLDFLMA (RG11) - ZONE 1

BellSouth	Tariff-Cu	ustomer
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Business lines x 3 l Hunting x 3 lines	ines	\$110.85 \$30.00				
	Total MRC:	\$140.85	Per line:	\$46.95	vs Key Customer Percentage Diff	\$17.39 58.83%
	Total NRC:	\$80.00				00.0070
FDN Tariff-Custo	omer*					
Business lines x 3 l	ines	\$88.68				
Hunting x 3 lines	Total MRC:	\$22.50 <b>\$111.18</b>	Per line:	\$37.06	vs Key Customer	\$7.50
	Total Mixe.	\$111.70	rei iiie.	\$37.00	Percentage Diff	25.37%
	Total NRC:	\$150.00			· oronnago zim	20.01 70
BellSouth Key C	ustomer**					
Business lines x 3 l		\$88.68				
Hunting x 3 lines		\$0.00				
	Total MRC:	\$88 68	Per line:	\$29.56		

Total NRC:

\$0.00

<sup>\*</sup>Customer signs a 36 month commitment with Florida Digital Network.

<sup>\*\*</sup>Customer signs a 36 month commitment with BellSouth.

MAGNOLIA - ORLDFLMA (RG11) - ZONE 1

FON Resale-Standard

Business lines x 3 lines

\$92.22

Hunting x 3 lines

\$24.96

Total MRC: \$117.17

Per line:

\$39.06

vs Key Customer

\$9.50

Percentage Diff 32.13%

FDN Resale-Key Customer

Business lines x 3 lines

\$73.77

Hunting x 3 lines

\$0.00 **\$73.77** 

Per line:

\$24.59

vs Key Customer

-\$4.97

Percentage Diff -16.81%

FON UNEXP-Zone (181

Total MRC:

Total MRC:

\$65.46

Per line:

\$21.82

vs Key Customer

-\$2.77

Percentage Diff

-11.27%

### MAGNOLIA - ORLDFLMA (RG11) - ZONE 1

FDN UNE-P-Zone 1\*\*\*

Total MRC:

\$60.72

Per line:

\$20.24

vs Key Customer Percentage Diff -\$4.35 -17.69%

<sup>\*\*\*</sup>Includes features, usage, SL-1 / SL-2 NRC, and SOMEC.

# Retail TAMARAC - PMBHFLTA (RG12) - ZONE 2

Rel	South	Tari	ff-Cu	stomer
	I-Outil	I all	ıı-Ju	SLUILIEI

	\$110.85 \$30.00 MRC: <b>\$140.85</b> NRC: <b>\$80.00</b>	Per line: \$46.95	vs Key Customer Percentage Diff	\$17.39 58.83%
FDN Tariff-Customer* Business lines x 3 lines Hunting x 3 lines Total	\$88.68 \$22.50 MRC: \$111.18 NRC: \$150.00	Per line:\$37.06	vs Key Customer Percentage Diff	\$7.50 25.37%
BellSouth Key Custom Business lines x 3 lines Hunting x 3 lines Total	\$88.68 \$0.00	Per line: \$29.56	3	

<sup>\*</sup>Customer signs a 36 month commitment with Florida Digital Network.

<sup>\*\*</sup>Customer signs a 36 month commitment with BellSouth.

### TAMARAC - PMBHFLTA (RG12) - ZONE 2

FDN Resale-Standard

Business lines x 3 lines Hunting x 3 lines \$92.22

\$24.96

Total MRC: \$117.17

Per line:

6

vs Key Customer Percentage Diff \$9.50

f 32.13%

FDN Resale Key Customer

Business lines x 3 lines Hunting x 3 lines \$73.77 \$0.00 **\$73.77** 

Per line:

\$24.59

vs Key Customer

-\$4.97

Percentage Diff -16.81%

EDNUNE-P-Zone 2\*\*\*

Total MRC:

Total MRC:

\$77.88

Per line: \$25.96

.96\_\_

vs Key Customer Percentage Diff \$1.37 5.57%

TAMARAC - PMBHFLTA (RG12) - ZONE 1

FDN UNE-P-Zone 1\*\*\*

Total MRC:

\$60.72

Per line:

\$20.24

vs Key Customer Percentage Diff -\$4.35 -17.69%

<sup>\*\*\*</sup>Includes features, usage, SL-1 / SL-2 NRC, and SOMEC.

### Retail SEBASTIAN - SBSTFLFE (RG6) - ZONE 3

BellSout	h Tariff-C	Customer
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Business lines x 3 lines \$98.85 Hunting x 3 lines \$30.00

Total MRC: \$128.85 Per line: \$42.95 vs Key Customer N/A
Percentage Diff N/A

Total NRC: \$80.00

FDN Tariff-Customer\*

Business lines x 3 lines \$79.08 Hunting x 3 lines \$22.50

Total MRC: \$101.58 Per line: \$33.86 vs Key Customer N/A
Percentage Diff N/A

Total NRC: \$150.00

**BellSouth Key Customer\*\*** 

Business lines x 3 lines N/A Hunting x 3 lines N/A

Total MRC: N/A Per line: N/A

Total NRC: N/A

<sup>\*</sup>Customer signs a 36 month commitment with Florida Digital Network.

<sup>\*\*</sup>Customer signs a 36 month commitment with BellSouth.

	Whole SEBASTIAN - SBSTFI		3
Business lines x 3 lines \$82.23 Hunting x 3 lines \$24.96  Total MRC: \$107.19	Per line: \$35.73	vs Key Customer Percentage Diff	N/A N/A
Business lines x 3 lines Hunting x 3 lines Total MRC:  N/A  N/A	Per line: N/A	vs Key Customer Percentage Diff	N/A N/A
FDN UNE P Zone 3734 Total MRC: \$117.78	Per line: <u>\$39.26</u>	vs Key Customer Percentage Diff	N/A N/A
	SEBASTIAN - SBSTF	LFE (RG6) - ZONI	<b>= 3</b>
FDN UNE-P-Zone 3*** Total MRC: \$105.30	Per line: \$35.10	vs Key Customer Percentage Diff	N/A N/A

<sup>\*\*\*</sup>Includes features, usage, SL-1 / SL-2 NRC, and SOMEC.

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent by regular mail to the persons listed below, other than those marked with an (\*) who have been sent a copy via overnight mail, this / 1th day of February, 2003.

BellSouth Telecommunications, Inc.\* Nancy White/Meredith Mays C/O Ms. Nancy H. Sims 150 S. Monroe Street Suite 400 Tallahassee, FL 32301-1556 nancy.sims@bellsouth.com

Ms. Felicia Banks \* Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 fbanks@psc.state.fl.us

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XO Florida, Inc.

Florida Competitive Carriers Assoc. C/O McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman/Perry 117 S. Gadsden Street Tallahassee, FL 32301 vkaufman@mac-law.com

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