

# REDACTED

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising )  
from Federal Communications Commission ) Docket No. 030851-TP  
triennial UNE review: Local Circuit Switching )  
for Mass Market Customers. ) Filed: October 31, 2003  
)

### AT&T'S RESPONSES TO BELLSOUTH'S FIRST SET OF INTERROGATORIES

#### REDACTED VERSION

Subject to the General Objections filed with the Florida Public Service Commission on or about October 16, 2003, AT&T Communications of the Southern States, LLC and TCG South Florida (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, submits the following responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communication of the Southern States, LLC, served on October 9, 2003, as follows:

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10979 100-400  
FPC-03-1054-PCO-TP

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 1: Identify each switch owned by AT&T that AT&T uses to provide a qualifying service anywhere in Florida, irrespective of whether the switch itself is located in the state and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch.)

Response: Subject to the following, see Confidential Attachments 1 and 1A. To the extent that the definitions of “qualifying service” and “non-qualifying service” as defined by BellSouth in BellSouth’s First Set of Interrogatories to AT&T are different than the definitions of “qualifying” and “non-qualifying” service as defined in 47 C.F.R. § 51.5, this interrogatory is vague. Specifically, 47 C.F.R. § 51.5 defines a “qualifying service” as “a telecommunications service that competes with a telecommunications service that has been traditionally the exclusive or primary domain of incumbent local exchange carriers (“ILECs”), including, but not limited to, local exchange service, such as plain old telephone service (“POTS”), and access services, such as digital subscriber line services and high capacity circuits.” “Non-qualifying services” are defined as services that are “not qualifying service[s].” Id. Subject to the foregoing, and without waiving any objection, AT&T will construe the terms contained in this interrogatory, and all other interrogatories, in accordance with 47 C.F.R. § 51.5 and applicable law and consider all traditional local telecommunications service as a “qualifying” service and all traditional long distance service as “non-qualifying” service.

Subject to the foregoing and pursuant to Section 1.340(c), Florida Rules of Civil Procedure, see Confidential Attachments 1 and 1a. These attachments provide information on two categories of switches used (and owned) by AT&T. The first category consists of "Class 5" switches.

The second category consists of switches used (and owned) by AT&T to provide AT&T Digital Link Service (“ADL”) to enterprise using “Class 4” and “Class 5 edge” long-distance switches. ADL is not a stand-alone local product but rather one that allows large enterprise AT&T long distance customers to add local voice traffic to their dedicated facilities that handle voice and data transmission. This permits customers to maximize

efficiency by using the same trunks for local, intraLATA, long distance and international calls. Customers that subscribe to ADL service use a DS1 or higher level facility and must also employ sophisticated customer premises equipment on their premises. The switches are not capable of providing service to mass market customers because they do not have the necessary connectivity (i.e., line-side analog ports), functionality (e.g., vertical features like call waiting and call forwarding), and network interconnection, including connection to Public Safety Answering Points. AT&T does not use unbundled network elements to provide ADL service.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 2: For each identified response in Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

Response: See response to Interrogatory No. 1, *supra*.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 3: Identify any other switch not previously identified in Interrogatory No. 1 that AT&T uses to provide a qualifying service anywhere in Florida, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch.) In answering this Interrogatory, do not include ILEC switches used by AT&T either on an unbundled or resale basis.

Response: AT&T incorporates by reference its response to Interrogatory No. 1 as if fully set forth.

Subject to the foregoing, none.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 4: For each switch identified in response to Interrogatory No. 3, please:

- (a) Identify the person that owns the switch;
- (b) Provide the Common Language Location Identifier ("CILLI") code of the switch;
- (c) Provide the street address, including the city and state in which the switch is located;
- (d) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (e) Describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
- (f) Identify all documents referring or relating to the rates, terms and conditions of AT&T's use of the switch;
- (g) Provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG;

Response: No switches were identified in response to Interrogatory No. 3.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 5: Identify by name, address and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Florida utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you do cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, **XXX Begin Confidential – Subject to Protective Order**

**End Confidential - Subject To Protective Order XXX.**

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 6: For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory #1.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, AT&T does not track line and voice grade equivalent (VGE) data or end user locations by ILEC wire center areas. In most instances, NPA-NXX data is provided which can be utilized to identify wire center areas. Also, system functions provide line and VGE data by product lines and services rather than in the aggregate. Attachment 6A provides derived VGEs for the LNS product line. These VGEs are then associated with city locations based on NPA-NXX. Services within the LNS product line are provisioned both via UNE-L and UNE-P. Current system capabilities do not allow disaggregation by provisioning method. Additional research is being performed, the results of which will be provided as they become available. Attachment 6B provides derived VGEs (derived VGEs in this report are adjusted for utilization) for the ADL product line. These lines are also associated with city locations based on NPA-NXX. Attachment 6C provides line counts for the AIO product line. These lines are associated with city locations based on zip code information. Additional research is being performed to associate the AIO VGEs with NPA-NXX data consistent with the other product lines. This data will be provided as it becomes available.

See Confidential Attachments 6a, 6b, and 6c.

Provided by: Mark Argenbright



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 7: With regard to the voice grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-g grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice- grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice- grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice- grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines;
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

AT&T does not maintain data in the format of number of lines per end-user customer location.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 8: Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Florida utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, there were no switches identified in response to Interrogatory No. 3.

Provided by: Jay Bradbury

REQUEST: Bellsouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 9: For each ILEC wire center identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

Response: None.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 10: With regard to the voice-grade equivalent lines identified by ILEC wire center area (or LEC exchange) in response to Interrogatory No. 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent lines;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent line;
- (c) The number of end user customers to whom you provide three (3) voice- grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice- grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice- grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice- grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice- grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice- grade equivalent lines;
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response: None.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 11: Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Florida using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries for a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, see Confidential Attachment No. 11. AT&T's tariff allows AT&T to provide service throughout BellSouth's entire territory. For Verizon, AT&T does not provide qualifying service in the attached local serving wire centers.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 12: For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center using an ILEC's switch either on an unbundled or resale basis.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, **XXX Begin Confidential – Subject to Protective Order**

**End Confidential - Subject To Protective Order XXX.**

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 13: With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory No. 12, separate the lines by end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent line;
- (c) The number of end user customers to whom you provide three (3) voice- grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice- grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice- grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice- grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines;
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, see Confidential Attachment No. 13.  
Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 14: Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states of the BellSouth region? If the answer to this Interrogatory is in the affirmative, for each switch that you use or provide such switching capacity, please:

- (a) Provide the Common Language Location identifier ("CLLI") code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS 100.)
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving, based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring to or relating to the rates, terms and conditions of AT&T's provision of switching capability.

Response: Specifically with respect to subpart (f), AT&T objects on the basis that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Documents referring to the terms of AT&T's provisioning of switching for Comcast are not relevant given the prior explanation.

AT&T incorporates by reference its response to Interrogatory No. 1, as if fully set forth. Subject to the foregoing, and without waiving any objection, AT&T does not offer wholesale unbundled switching to other carriers. **XXX Begin Confidential – Subject to Protective Order**

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**End Confidential - Subject To Protective Order XXX.**

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 15: Identify every business case in your possession, custody or control that evaluates, analyzes or otherwise refers or relates to the offering of a qualifying service using:  
(1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioning switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

Objection: AT&T objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence.

Pursuant to the *Procedural Order*, the Triennial Review Order, Rule 28-106.206 Florida Administrative Code, and Rules 1.280 and 1.340 Florida Rules of Civil Procedure, to the extent that this interrogatory requests specific financial, business or proprietary information regarding AT&T's economic business model, AT&T objects to providing or producing any such information on the grounds that those requests presume that the market entry analysis is contingent upon AT&T's economic business model instead of the hypothetical business model contemplated by the Triennial Review Order. The Triennial Review Order explicitly contemplates that in considering whether a competing carrier economically can compete in a given market without access to a particular unbundled network element, the Commission must consider the likely revenues and costs associated with the given market based on the *most efficient business model* for entry rather than to a *particular carrier's business model*. TRO at ¶ 326. In particular, the FCC stated:

In considering whether a competing carrier could economically serve the market without access to the incumbent's switch, the state commission must also consider the likely revenues and costs associated with local exchange mass market service . . . The analysis must be based on the *most efficient business model* for entry rather than to any *particular carrier's business model*.

Id. [Emphasis Added] Additionally, with respect to economic entry, in ¶ 517, the FCC stated that “. . . [t]he analysis must be

based on the most efficient business model for entry rather than to any particular carrier's business model." Furthermore, in Footnote 1579 of Paragraph 517, the FCC clarified that ". . . [s]tate commissions should not focus on whether competitors operate under a cost disadvantage. State commissions should determine if entry is economic by conducting a business case analysis for an *efficient entry*." [emphasis added]

In addition to these statements, the FCC also made numerous other references to the operations and business plans of an efficient competitor, specifically rejecting a review of a particular carrier's business plans or related financial information. See, ¶ 84, Footnote 275 ("Once the UNE market is properly defined, impairment should be tested by asking whether a *reasonable efficient CLEC* retains the ability to compete even without access to the UNE.") (citing BellSouth Reply, Attach 2, Declaration of Howard A. Shelanski at ¶2(emphasis added)). See also, TRO at ¶115; ¶469; ¶485, Footnote 1509; ¶517, Footnote 1579; ¶519, Footnote 1585; ¶520, Footnotes 1588 and 1589; ¶581, and Footnote 1788.<sup>1</sup>

Accordingly, the FCC's TRO specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T financial information or business plans will not lead to the discovery of admissible evidence in this proceeding.

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<sup>1</sup> For the Commission's convenience, please see Attachment 1 to AT&T's Response to BellSouth's Request for Production of Document sets forth the text of these relevant Paragraphs and Footnotes from the TRO. Complete text of the Triennial Review Order is available @ [www.fcc.gov](http://www.fcc.gov).

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 16: Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

Objection: AT&T incorporates its objection to Interrogatory No.15 as if fully set forth.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 17: If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

Objection AT&T incorporates by reference its objections to Interrogatory 15 as if fully set forth.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 18: Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Florida? If the answer to this interrogatory is in the affirmative, please:

- (a) Provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving, based on the switch’s existing configuration and component parts; and
- (f) Identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Florida.

Response: No.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 19: Identify each MSA in Florida where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale or in some other fashion.

Response: With regard to UNE-P, AT&T is currently offering local services in Florida. With regard to local services using AT&T facilities, see confidential response to Interrogatory No. 5, *supra*. AT&T does not actively offer local services in Florida using resale.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 20: If you are offering a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting those areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, or resale.

Response: See confidential response to Interrogatory No. 19, *supra*.

Provided by: Jay Bradbury



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 21: Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify the web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms, and conditions upon which such service is provided.

Response: AT&T incorporates it's response to Interrogatory No. 1. Subject to the foregoing, qualifying services offered by AT&T "including the rates, terms, and conditions under which services are offered" can be found in AT&T's publicly available tariffs on file with the Florida Public Service Commission. Additionally, information regarding these services are available at [http://serviceguide.att.com/servicelibrary/business/ext/state\\_tariff\\_buss.cfm](http://serviceguide.att.com/servicelibrary/business/ext/state_tariff_buss.cfm). While the website does prompt the input of a telephone number, AT&T has stated in response to previous Interrogatory responses the geographic areas where these services are available.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 22: Identify each MSA in Florida where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, or resale, or in some other fashion.

Response: AT&T incorporates its responses to Interrogatory No. 1. Subject to the foregoing, AT&T offers long distance services statewide in the state of Florida.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 23: If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale or in some other fashion.

Response: See response to No. 22.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 24: Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify the web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms, and conditions upon which such service is provided.

Response: AT&T incorporates its responses to Interrogatory No. 1, as if fully set forth herein. Given the vague and indefinite definition of non-qualifying services, AT&T cannot provide a description of all of the non-qualifying services it offers. AT&T provides long distance services statewide. A description of those services is publicly available at AT&T's website [www.att.com](http://www.att.com).

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 25: Please state the total number of end user customers in the State of Florida to whom you only provide qualifying service.

Response: AT&T incorporates its responses to Interrogatory No. 1. Subject to the foregoing, none.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 26: For those end user customers to whom you provide qualifying service in the state of Florida, please state the average monthly revenues you receive from each end-user customer.

Objection: AT&T incorporates its objection to Interrogatory No. 15, *supra* and reiterates that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T financial information or business plans will not lead to the discovery of admissible evidence in this proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 27: For those end user customers to whom you only provide qualifying service in the State of Florida, please state the average number of lines that you provide each such end user customer.

Response: AT&T incorporates by reference its response to Interrogatory No. 1 as if fully set forth. Subject to the foregoing, and without waiving any objection, none

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 28: Please state the total number of end user customers in the State of Florida to whom you provide only non-qualifying service.

Response: AT&T incorporates by reference its response to Interrogatory No. 1 as if fully set forth herein. Subject to the foregoing, and without waiving any objection, AT&T will provide the total number of PIC'd long distance customers in Florida by supplemental response on or before November 24, 2003.

Provided by: Jay Bradbury



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 29: For those end user customers to whom you only provide non-qualifying service in the State of Florida, please state the average monthly revenues you receive from each such customer.

Objection: AT&T incorporates its responses to Interrogatory No. 15, *supra* and reiterates that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T financial information or business plans will not lead to the discovery of admissible evidence in this proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 30: Please state the total number of end user customers in the State of Florida to whom you provide both qualifying and non-qualifying service;

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth. Subject to the foregoing, and without waiving any objection. AT&T currently in the process of obtaining this information and will supplement its response to this Interrogatory before November 24, 2003.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 31: For those end user customers to whom you provide qualifying and non-qualifying service in the State of Florida, please state the average monthly revenues you receive from each such end user customer

Objection: AT&T incorporates its responses to Interrogatory No 15, *supra* and reiterates that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T financial information or business plans will not lead to the discovery of admissible evidence in this proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 32: For those end user customers to whom you provide qualifying and non-qualifying service in the State of Florida, please state the average number of lines that you provide each customer.

Response: AT&T has no information responsive to this request.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 33: Please provide a breakdown of the total number of end user customers served by AT&T in Florida by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity that classification so that it can be determined what kinds of customers you have in each classification.)

Response: See responses to Interrogatory Nos. 6, 7, 11, and 12.

XXX Begin Confidential –Subject to Protective Order

XXX End confidential –Subject to Protective Order

Provided by: Mark Argenbright

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 34: For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

Objection: AT&T incorporates its responses to Interrogatory #15, *supra* and reiterates that the FCC's TRO specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T financial information or business plans will not lead to the discovery of admissible evidence in this proceeding.

Furthermore, the TRO specifically mentions that one consideration of the economic impairment analysis is the potential cost of market entry to the hypothetical "efficient entrant," including the cost of customer acquisitions. See, TRO at ¶520. Accordingly, the "average acquisition cost" to AT&T specifically for a particular user class or type is not relevant or reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 35: For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

Objection: AT&T incorporates its responses to Interrogatory No 15, *supra* and reiterates that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*. Furthermore, it should be noted that the *TRO* specifically mentions that one consideration of the economic impairment analysis is the potential "impact of churn on the cost of customer acquisitions" for the hypothetical "efficient entrant". Accordingly, AT&T's "typical churn rate" for a particular user class or type is not relevant or reasonably calculated to lead to the discovery of admissible evidence. See, *TRO* at ¶520.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 36: For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market that you have obtained. Please provide this information from January 2000 to the present.

Response: AT&T, like BellSouth, relies on industry publications assessing "market shares." Upon information and belief, BellSouth has possession, custody, or control of those same industry publications.



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 37: Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Florida.

Response: AT&T, like BellSouth, relies on industry publications assessing "market shares." Upon information and belief, BellSouth has possession, custody, or control of those same industry publications.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 38: Identify any documents in your possession, custody or control that evaluate or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Florida.

Response: AT&T incorporates its objection to Interrogatory No. 15, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 39: Describe how the marketing organization that is responsible for marketing qualifying service in Florida is organized, including the organization's structure, size in terms of full-time or equivalent employees, including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing effort in Florida, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

Response: AT&T incorporates its objection to Interrogatory No. 15, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 40: How do you determine whether you will serve an individual customer's location with multiple DS0s or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors you would consider in making this type of decision.

Response: AT&T is currently in the process of compiling information responsive to this Interrogatory, and will supplement its response on or before November 24, 2003.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 41: Is there a typical or average number of DSOs at which you would choose to serve a particular customer with a DS1 or larger transmission system? All other things being equal? If so, please describe that typical or average number and explain how that number was derived.

Response: AT&T is currently in the process of compiling information responsive to this Interrogatory, and will supplement its response on or before November 24, 2003.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 42: What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on the network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

Response: AT&T is currently in the process of compiling information responsive to this Interrogatory, and will supplement its response on or before November 24, 2003.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 43: What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

Objection: AT&T incorporates its objections to Interrogatory No 15, *supra* and notes that the FCC's TRO specifically contemplates the consideration of financial and related information of an efficient "model" competitor and not that of AT&T or any other *particular competitor*.

Furthermore, it should be noted that the TRO mentions that one consideration of the economic impairment analysis is the cost of capital for the hypothetical "efficient entrant." Specifically, ¶520 of the TRO states that the state "must consider all factors affecting the costs faced by a competitor providing local exchange service to the mass market." See also, TRO at ¶520. Accordingly, AT&T's "cost of capital" used in evaluating whether to offer a qualifying service in a particular geographic market and the analysis in determining the cost of capital is not relevant or reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 44: With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

Objection: AT&T incorporates its objections to Interrogatory No15, *supra* and notes that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*.

Furthermore, it should be noted that the *TRO* mentions that one consideration of the economic impairment analysis is the cost of capital for the hypothetical "efficient entrant." Specifically, ¶520 of the *TRO* states that the state "must consider all factors affecting the costs faced by a competitor providing local exchange service to the mass market." See also, *TRO* at ¶520. Accordingly, AT&T's "cost of capital", or the components thereof, used in evaluating whether to offer a qualifying service in a particular geographic market and the analysis in determining the cost of capital is not relevant or reasonably calculated to lead to the discovery of admissible evidence.



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 45: In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years, or some other time horizon over which to evaluate the project?

Objection: AT&T incorporates its objections to Interrogatory No. 15, *supra* and notes that the FCC's TRO specifically contemplates the consideration of financial and related information of an efficient "model" competitor and not that of AT&T or any other particular competitor.

Accordingly, AT&T's determination of whether to offer a "qualifying service in a particular geographic market" and the time periods involved in such evaluation are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 46: Provide your definition of sales expense as that term is used in your business.

Response: Pursuant to Section 1.340(c), Florida Rules of Civil Procedure, see Attachment No. 46.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 47: Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

Objection: AT&T incorporates its objections to Interrogatory No. 15, *supra* and notes that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 48: Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

Response: Pursuant to Section 1.340(c), Florida Rules of Civil Procedure, see Attachment No. 48.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 49: Based on the definitions of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market.

Objection: AT&T incorporates its objections to Interrogatory No. 15, *supra* and notes that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 50: For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for AT&T in each state in BellSouth's region.

Response: Upon information and belief, BellSouth is in possession of documents and other information requested in Interrogatory Nos. 50 and 51. Assuming BellSouth will provide such information and documentation to AT&T, AT&T will confirm or deny the information contained in BellSouth's records.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 51: For each individual hot cut identified in response to Interrogatory No. 50, state:

- i. Whether the hot cut was coordinated or not;
- ii. If coordinated, whether the hot cut occurred as scheduled;
- iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, AT&T, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- iv. If there was a problem with the hot cut, state whether AT&T complained in writing to BellSouth or anyone else.

Response: Upon information and belief, BellSouth is in possession of documents and other information requested in Interrogatory Nos. 50 and 51. Assuming BellSouth will provide such information and documentation to AT&T, AT&T will confirm or deny the information contained in BellSouth's records.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 52: Does AT&T have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe or otherwise refer or relate to this preferred process.

Response: Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 53: Does AT&T have a preferred process for performing individual hot cuts? If the answer to this interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

Response: AT&T's preferred process allows the provisioning of loops used for local service to be operationally and competitively neutral, making it the local service counterpart of "equal access" in the long-distance market. This is a process that AT&T has generically referred to as "electronic loop provisioning" ("ELP"). In this environment, consumers would be able to change their local carrier seamlessly, and no carrier would have an inordinate advantage in competing for a mass market customer's business. Implementation of such an electronic provisioning process would create permanent virtual circuits that could use software commands to shift loops from one carrier to another quickly and inexpensively, with no loss or degradation of service.

Pursuant to Rule 1.340(c) of the Florida Rules of Civil Procedure, see also Attachment No. 53.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 54: State whether AT&T agrees that it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 15, 2001 Memorandum of Understanding. If AT&T does not agree, explain why and explain AT&T's view of its involvement in the development of that process.

Response: Yes, AT&T agrees that it jointly developed the process described, *supra*. Additionally, it tried in good faith to use the process. However, due to continuing operational difficulties, customer dissatisfaction, and prohibitively high costs, AT&T severely curtailed its use later in 2001. For example, according to BellSouth's performance data, AT&T only completed 30 hot cut orders for the entire nine-state region in December 2001. Further, this process was developed for use of UNE-L as one means of acquiring mass market customers and was not developed contemplating its use in an environment without access to local unbundled switching.

Provided by: Denise Berger

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 55: If AT&T has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in AT&T's process that differs from BellSouth's process.

Response: See response to Interrogatory No. 53, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 56: If AT&T has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in AT&T's process that differs from BellSouth's process.

Response: In responding to this Interrogatory, AT&T assumes that BellSouth is referring to the batch hot cut process as defined in BellSouth's First Set of Interrogatories to AT&T. Accordingly, see response to Interrogatory No. 52.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 57: Does AT&T have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response: See response to Interrogatory No. 53, *supra* for AT&T's preferred individual migration process. AT&T does not have a specific rate at this time, but as a fully electronic solution, it should be no more expensive than a UNE-P or PIC change.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 58: Does AT&T have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response: In responding to this Interrogatory, AT&T assumes that BellSouth is referring to a batch hot cut process as defined in BellSouth's First Set of Interrogatories to AT&T. That being the case, AT&T does not have a specific batch rate at this time. However, guidance provided by the FCC suggests that it should be 1) based on TELRIC, TRO at ¶489, low cost, Id. at ¶489, lower than current rates, Id. at ¶487, and comparable to UNE-P, Id. at ¶512, Footnote 1574. See also response to Interrogatory No. 79, *infra*.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 58: Does AT&T have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response: In responding to this Interrogatory, AT&T assumes that BellSouth is referring to a batch hot cut process as defined in BellSouth's First Set of Interrogatories to AT&T. That being the case, AT&T does not have a specific batch rate at this time. However, guidance provided by the FCC suggests that it should be 1) based on TELRIC, TRO at ¶489, low cost, Id. at ¶489, lower than current rates, Id. at ¶487, and comparable to UNE-P, Id. at ¶512, Footnote 1574. See also response to Interrogatory No. 79, *infra*.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 59: What is the largest number of individual hot cuts that AT&T has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

Response: The requested information is in the possession, custody and control of BellSouth. Assuming BellSouth will provide such information and documentation to AT&T, AT&T will confirm or deny the information contained in BellSouth's records.



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 60: Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to AT&T or that AT&T believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

Response: See AT&T's response to Interrogatory No. 64, *infra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 61: Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.

Response: AT&T incorporates its response to Interrogatory No.52 as if fully set forth.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 62: Does any ILEC in the BellSouth Region have an individual hot cut process that is acceptable to AT&T or that AT&T believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

Response: No ILEC in the BellSouth Region has an individual hot cut process that is acceptable to AT&T.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 63: Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.

Response: No ILEC has an acceptable rate for an individual hot cut process in BellSouth's region.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 64: Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to AT&T or that AT&T believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

Response: ILECs have just begun to provide components or outlines of proposed batch processes in workshops throughout the country; therefore, AT&T does not have sufficient information to respond at this time. However, previous project or bulk processes did have components that were superior to BellSouth's process. For example, Verizon-NY and SBC have "bulk" provisioning processes and allow time specific migrations. Further, Verizon has in place an electronic communications system which offers some advantages over manual phone calls or faxes.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 65: Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.

Response: AT&T incorporates its response to Interrogatory Nos. 52 and 64 as if fully set forth.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 66: Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to AT&T or that AT&T believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

Response: Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 67: Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.

Response: Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 68: Does AT&T order coordinated or non-coordinated hot cuts?

Response: AT&T has ordered both coordinated and non-coordinated cuts.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 69: Does AT&T use the CFA database?

Response: Yes.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 70: Identify every issue related to BellSouth's hot cut process raised by AT&T at the Florida CLEC collaborative since October 2001.

Response: Due to the high costs and operational issues of hot cuts (see Attachment 70), AT&T has purchased minimal numbers of hot cuts since that period of time. For example, based on BellSouth's PMAP reports, BellSouth completed 298 (regionally) hot cut LSRs in October 2001, but only 18 in October 2002. Based in part on the above complications, AT&T has focused on other modes of market entry. Therefore, AT&T has not used this forum for hot cut issues, but has primarily focused instead on issues that are most relevant to modes of entry used by AT&T.

Pursuant to Rule 1.340(c) of the Florida Rules of Civil Procedure, see Attachment 70A for issues raised by AT&T in the Florida collaborative. It should also be noted that other CLECs raised issues that were of interest to AT&T, making it unnecessary for AT&T to engage in any duplicative efforts.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 71: What is the appropriate volume of loops that you contend the Florida Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: AT&T incorporates its response to Interrogatory No. 52 as if fully set forth.

In addition, AT&T is currently without sufficient information to answer this interrogatory with an exact volume or number. Furthermore, AT&T refers BellSouth to ¶489 of the TRO and asserts that the appropriate volume of loops must meet the operational and economic models as defined by the FCC and the TRO. In other words, the requisite volume of loops to meet the TRO and the FCC Rule cited above is that amount required to support demand created by the additional volume of customers added as a result of the implementation of the FCC's TRO, and to ensure unconstrained future growth of competition post TRO implementation.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 72: What is the appropriate process that you contend the Florida Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: AT&T incorporates its response to Interrogatory No. 52 as if fully set forth.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 73: If AT&T disagrees with BellSouth's individual hot cut process, identify every step that AT&T contends is unnecessary and state with specificity why the step is unnecessary.

Response: See response to Interrogatory No. 53, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 74: If AT&T disagrees with BellSouth's bulk hot cut process, identify every step that AT&T contends is unnecessary and state with specificity why the step is unnecessary.

Response: AT&T disagrees with, at a minimum, the following aspects of BellSouth's process, even as an interim batch process to be used in narrow, tailored circumstances. :

- a. It does not appear to be a batch provisioning process, i.e. all the orders are not provisioned at the same time, or even on the same day.
- b. It does not permit time specific cuts.
- c. It does not allow coordinated cuts if a change of facilities is required.
- d. It does not allow after-business-hours cuts, which are necessary to meet customers need to have uninterrupted telephone phone service during business hours.
- e. There is no assurance that services requested by the CLEC to be migrated on the same "batch" order will in fact be worked on the same day, undermining significantly the ability of the CLEC to impact the quality and timing of the cut-over. Indeed, BellSouth appears to provision its batch orders no differently than its individual orders.
- f. There is no assurance that all of an individual customer's lines will be cut on the same day, creating further customer satisfaction issues. For example, BellSouth could create groups of lines to migrate that included some of one customer's lines and some of another customer's lines but not all of either customer's lines.
- g. BellSouth is unwilling to commit to the number of lines or customers it will provision per day.
- h. BellSouth's process does not provide for any additional

safeguards, such as real-time communication between the two companies during the conversion process, or a process for timely service restoration in the event of a problem.

- i. There are no cost savings to the CLEC from using this process.

Provided by: Sharon Norris



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 75: Identify by date, author and recipient every written complaint AT&T has made to BellSouth regarding BellSouth's hot cut process since October 2001.

Response: Pursuant to Rule 1.340(c) of the Florida Rules of Civil Procedure, see Attachment No. 75. See also response to Interrogatory No. 70.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 76: How many unbundled loops does AT&T contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

Response: See response to Interrogatory No. 71, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 77: What is the appropriate information that you contend the Florida Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.310(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: The FCC's TRO ¶512 and Footnote 1574 outlines the overall or high level criteria that the Florida Public Service Commission should consider when evaluating the question posed in Interrogatory No. 77.

In addition to the above, discovery in this case is continuing in nature and the response to this interrogatory may evolve as AT&T formulates the case it will present before the Commission

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 78: What is the average completion interval metric for provision of high volumes of loops that you contend the Florida Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: The FCC's TRO ¶512 and Footnote 1574 outlines the overall or high level criteria that the Florida Public Service Commission should consider when evaluating the question posed in Interrogatory #78. According to the FCC's Rules and the TRO, the average completion interval metric for provision of high volumes of loops must be, at a minimum, equal to the order completion interval for UNE-P. See, TRO ¶512, Footnote 1574.

In addition to the above, discovery in this case is continuing in nature and the response to this interrogatory may evolve as AT&T formulates the case it will present before the Commission.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 79: What are the rates that you contend the Florida Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: As indicated in the FCC Rule referenced above, rates must be set in accordance with the FCC UNE Pricing Rules. Furthermore, pursuant to ¶470 of the TRO, rates must be sufficiently low to overcome “impairment” and to allow CLECs to overcome the economic barriers associated with the hot cut process. See also response to Interrogatory No. 59, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 80: What are the appropriate product market(s) that you contend the Florida Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 81: What are the appropriate geographic market(s) that you contend the Florida Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: See response to Interrogatory No. 80.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 82: Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

Response: See response to Interrogatory No. 80.



REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 83: Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

Response: See response to Interrogatory No. 80.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 84: What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multilane end users at a single location that the Florida Public Service Commission should consider in establishing a "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: See response to Interrogatory No. 80.

SUBMITTED this 31<sup>st</sup> day of October, 2003.

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Suite 700  
Tallahassee, Florida 32301  
(850) 425-6360

Attorney for AT&T Communications of  
the Southern States, LLC

A&T Local Switches in Florida											
			Switch Address							V and H Coordinates	
Switch	Market	Switch CLLI	Street	City	State	Switch Class	Switch Man.	Installed T1 Capacity	% Utilization	V	H
1	Jacksonville	JCVLFLGHDS0		Jacksonville	FL	5ESS	Lucent			07658	01262
2	Jacksonville	JCVLFLCLDS6		Jacksonville	FL	DMS	Nortel			07613	01245
3	Miami-1	NMIAFLAYDS0		North Miami	FL	5ESS	Lucent			08328	00538
4	Miami-2	FTLDFLOVDS3		Ft. Lauderdale	FL	5ESS	Lucent			08283	00569
5	Miami-3	OJUSFLTLDS3		Ojus	FL	DMS	Nortel			08309	00541
6	Pompano Beach	PMBHFLEDDS0		Pompano	FL	5ESS	Lucent			08255	00569
7	Orlando	ORLEFLGVDS0		Orlando	FL	5ESS	Lucent			07942	01004
8	Tampa	TAMQFLRYDS0		Tampa	FL	5ESS	Lucent			08171	01166

AT&T Responses to BellSouth's First Set of Interrogatories  
 Attachments 1a and 1b -- Responsive Documents to Interrogatory Nos. 1 and 2  
 October 31, 2003

Switch ADL-Capable	Switch CLLI	City	State	Switch Class	Switch Man.	Assigned T1 Capacity	Equipped T1 Capacity
Yes	ELVFLMA01T	Ellisville	FL	4ESS	Lucent		
Yes	ELVFLMA02T	Ellisville	FL	DMS	Nortel		
Yes	FTLDFLOV01T	Ft. Lauderdale	FL	4ESS	Lucent		
Yes	FTLDFLOV02T	Ft. Lauderdale	FL	5ESS	Lucent		
Yes	FTMYFLMA01T	Ft. Myers	FL	4ESS	Lucent		
Yes	JCVLFLCL03T	Jacksonville	FL	4ESS	Lucent		
Yes	JCVLFLCL56T	Jacksonville	FL	5ESS	Lucent		
Yes	OJUSFLTLO3T	Ojus	FL	4ESS	Lucent		
Yes	ORLDFLMA03T	Orlando	FL	4ESS	Lucent		
Yes	ORLDFLMA35T	Orlando	FL	5ESS	Lucent		
Yes	TAMPFLCO01T	Tampa	FL	DMS	Nortel		
Yes	TAMPFLCO02T	Tampa	FL	4ESS	Lucent		
Yes	WPBHFLAN04T	West Palm Beach	FL	4ESS	Lucent		
Yes	WNDRFLTLO1T	Windermere	FL	4ESS	Lucent		

AT&T REDACTED

CLLI	LEC	ADDRESS	STATE	Enterprise Only	City	ZIP	MSA
				Central Office Name			
1	DYBFLMA	Bell South					
2	GSVFLMA	Bell South					
3	JCVLFLSM	Bell South					
4	NDADFLOL	Bell South					
5	OCALFLXA	Sprint					
6	ORLDFLMA	Bell South					
7	PNSCFLBL	Bell South					
8	SRSTFLXA	GTE					
9	TAMPFLXA	GTE					
10	TAMPFLXE	GTE					

CLLI	LEC	ADDRESS	STATE	Mass Mkt & Enterprise Central Office Name	City	ZIP	MSA
1							
2							
3							
4							
5							
6							
7							
8							
9							
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36							
37							
38							

ATT REDACTED

Propriety Restricted

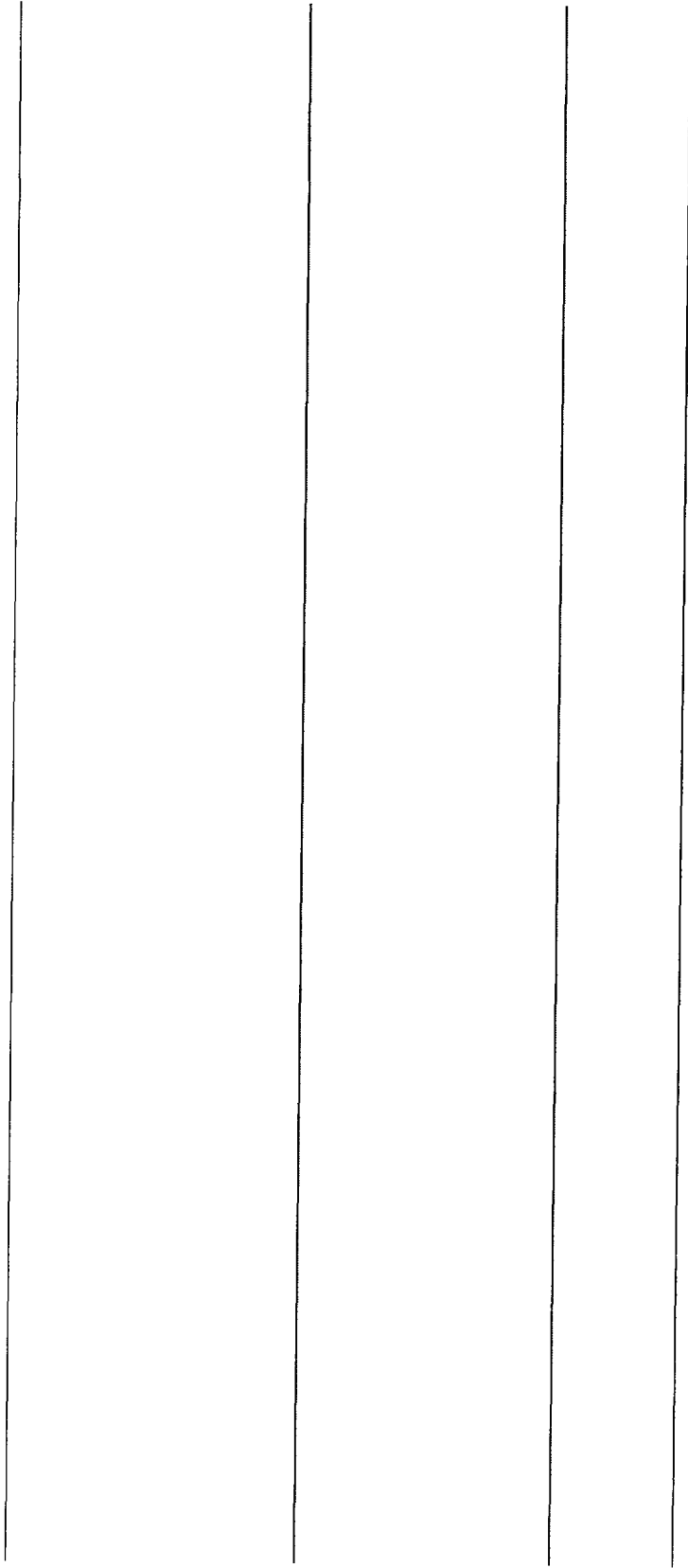
Attachment 6C

FL - AIO data as of Sept. 03

Detailed data below is based on Zip Codes

FLORIDA	City	UNE-L





ATT REDACTED

[Redacted content]

[Redacted content]

<i>FLORIDA Total</i>		

Proprietary Restricted

**FL - ADL data as of Sept. 03**

<b>STATE</b>	<b>CITY</b>	<b>NPANXX</b>	<b>Derived # VGE</b>
FL	CANTONMENT	850968	
FL	GULF BREEZE	850932	
FL	GULF BREEZE	850934	
FL	GULF BREEZE	850937	
FL	JAY	850675	
FL	MILTON	850626	
FL	PACE	850994	
FL	PENSACOLA	850316	
FL	PENSACOLA	850432	
FL	PENSACOLA	850433	
FL	PENSACOLA	850434	
FL	PENSACOLA	850436	
FL	PENSACOLA	850437	
FL	PENSACOLA	850444	
FL	PENSACOLA	850454	
FL	PENSACOLA	850457	
FL	PENSACOLA	850470	
FL	PENSACOLA	850473	
FL	PENSACOLA	850474	
FL	PENSACOLA	850475	
FL	PENSACOLA	850476	
FL	PENSACOLA	850477	
FL	PENSACOLA	850478	
FL	PENSACOLA	850479	
FL	PENSACOLA	850484	
FL	PENSACOLA	850492	
FL	PENSACOLA	850857	
FL	PENSACOLA	850941	
FL	PENSACOLA	850969	
FL	PNS BCH	850932	
FL	CRESTVIEW	850682	
FL	CRESTVIEW	850683	
FL	DESTIN	850267	
FL	DESTIN	850650	
FL	DESTIN	850654	
FL	DESTIN	850837	
FL	EGLIN FIELD	850678	
FL	FORT WALTON BEACH	850243	
FL	FORT WALTON BEACH	850244	
FL	FORT WALTON BEACH	850301	
FL	FORT WALTON BEACH	850862	
FL	FORT WALTON BEACH	850864	
FL	FT WALTON BEACH	850244	
FL	FT. WALTON BEACH	850244	
FL	FT. WALTON BEACH	850664	
FL	MARY ESTHER	850244	
FL	MARY ESTHER	850796	

FL	NICEVILLE	850729
FL	NICEVILLE	850897
FL	PANAMA CITY	850747
FL	PANAMA CITY	850763
FL	PANAMA CITY	850769
FL	PANAMA CITY	850785
FL	PANAMA CITY	850872
FL	PANAMA CITY	850913
FL	PANAMA CITY	850914
FL	MARIANNA	850482
FL	MARIANNA	850526
FL	AMELIA ISLAND (PLA	904277
FL	ATLANTIC BEACH	904246
FL	ATLANTIC BEACH	904685
FL	AUGUSTINE	904827
FL	BALDWIN	904266
FL	FERNANDINA BEACH	904261
FL	FERNANDINA BEACH	904277
FL	FERNANDINA BEACH	904321
FL	FERNANDINA BEACH	904491
FL	JACKSONVILLE BEACH	904241
FL	JACKSONVILLE BEACH	904273
FL	JACKSONVILLE	386328
FL	JACKSONVILLE	904220
FL	JACKSONVILLE	904221
FL	JACKSONVILLE	904223
FL	JACKSONVILLE	904245
FL	JACKSONVILLE	904247
FL	JACKSONVILLE	904249
FL	JACKSONVILLE	904256
FL	JACKSONVILLE	904260
FL	JACKSONVILLE	904268
FL	JACKSONVILLE	904279
FL	JACKSONVILLE	904281
FL	JACKSONVILLE	904288
FL	JACKSONVILLE	904292
FL	JACKSONVILLE	904296
FL	JACKSONVILLE	904306
FL	JACKSONVILLE	904332
FL	JACKSONVILLE	904348
FL	JACKSONVILLE	904350
FL	JACKSONVILLE	904353
FL	JACKSONVILLE	904354
FL	JACKSONVILLE	904355
FL	JACKSONVILLE	904356
FL	JACKSONVILLE	904358
FL	JACKSONVILLE	904361
FL	JACKSONVILLE	904363
FL	JACKSONVILLE	904367
FL	JACKSONVILLE	904371
FL	JACKSONVILLE	904376
FL	JACKSONVILLE	904378

FL	JACKSONVILLE	904380
FL	JACKSONVILLE	904388
FL	JACKSONVILLE	904390
FL	JACKSONVILLE	904391
FL	JACKSONVILLE	904396
FL	JACKSONVILLE	904398
FL	JACKSONVILLE	904419
FL	JACKSONVILLE	904443
FL	JACKSONVILLE	904464
FL	JACKSONVILLE	904470
FL	JACKSONVILLE	904483
FL	JACKSONVILLE	904485
FL	JACKSONVILLE	904486
FL	JACKSONVILLE	904489
FL	JACKSONVILLE	904518
FL	JACKSONVILLE	904519
FL	JACKSONVILLE	904588
FL	JACKSONVILLE	904620
FL	JACKSONVILLE	904632
FL	JACKSONVILLE	904636
FL	JACKSONVILLE	904641
FL	JACKSONVILLE	904642
FL	JACKSONVILLE	904665
FL	JACKSONVILLE	904693
FL	JACKSONVILLE	904695
FL	JACKSONVILLE	904696
FL	JACKSONVILLE	904720
FL	JACKSONVILLE	904721
FL	JACKSONVILLE	904722
FL	JACKSONVILLE	904724
FL	JACKSONVILLE	904725
FL	JACKSONVILLE	904727
FL	JACKSONVILLE	904730
FL	JACKSONVILLE	904731
FL	JACKSONVILLE	904732
FL	JACKSONVILLE	904733
FL	JACKSONVILLE	904737
FL	JACKSONVILLE	904739
FL	JACKSONVILLE	904741
FL	JACKSONVILLE	904751
FL	JACKSONVILLE	904757
FL	JACKSONVILLE	904764
FL	JACKSONVILLE	904766
FL	JACKSONVILLE	904777
FL	JACKSONVILLE	904778
FL	JACKSONVILLE	904779
FL	JACKSONVILLE	904781
FL	JACKSONVILLE	904783
FL	JACKSONVILLE	904786
FL	JACKSONVILLE	904791
FL	JACKSONVILLE	904826
FL	JACKSONVILLE	904855

FL	JACKSONVILLE	904858
FL	JACKSONVILLE	904880
FL	JACKSONVILLE	904886
FL	JACKSONVILLE	904905
FL	JACKSONVILLE	904908
FL	JACKSONVILLE	904924
FL	JACKSONVILLE	904928
FL	JACKSONVILLE	904954
FL	JACKSONVILLE	904987
FL	JACKSONVILLE	904992
FL	JACKSONVILLE	904997
FL	JACKSONVILLE	904998
FL	LAKE CITY	386752
FL	LAKE CITY	386755
FL	LAKE CITY	386758
FL	MACCLENNY	904653
FL	MANDARIN JACKSONVILLE	904486
FL	ORANGE PARK	904269
FL	ORANGE PARK	904272
FL	ORANGE PARK	904276
FL	ORANGE PARK	904278
FL	ORANGE PARK	904381
FL	ORANGE PARK	904541
FL	ORANGE PARK	904637
FL	ORANGE PARK	904688
FL	PALATKA	386325
FL	PALATKA	386328
FL	PONTE VEDRA BEACH	904273
FL	PONTE VEDRA BEACH	904280
FL	PONTE VEDRA BEACH	904285
FL	PONTE VEDRA	904285
FL	ST AUGUSTINE BEACH	904471
FL	ST AUGUSTINE	904810
FL	ST AUGUSTINE	904819
FL	ST AUGUSTINE	904824
FL	ST AUGUSTINE	904825
FL	ST AUGUSTINE	904827
FL	ST AUGUSTINE	904940
FL	ST. AUGUSTINE	904417
FL	ST. AUGUSTINE	904824
FL	STARKE	904964
FL	EDGEWATER	904424
FL	JACKSONVILLE	904228
FL	BROOKSVILLE	352796
FL	GAINESVILLE	352260
FL	GAINESVILLE	352331
FL	GAINESVILLE	352332
FL	GAINESVILLE	352335
FL	GAINESVILLE	352336
FL	GAINESVILLE	352338
FL	GAINESVILLE	352367
FL	GAINESVILLE	352371



FL	GAINESVILLE	352372
FL	GAINESVILLE	352373
FL	GAINESVILLE	352374
FL	GAINESVILLE	352375
FL	GAINESVILLE	352376
FL	GAINESVILLE	352377
FL	GAINESVILLE	352378
FL	GAINESVILLE	352379
FL	GAINESVILLE	352384
FL	GAINESVILLE	352392
FL	GAINESVILLE	352376
FL	SPRING HILL	352596
FL	SPRING HILL	352666
FL	SPRING HILL	352683
FL	BELLEVIEW	352347
FL	CLERMONT	352242
FL	CLERMONT	352243
FL	CRYSTAL RIVER	352563
FL	CRYSTAL RIVER	352795
FL	DADE CITY	352567
FL	EUSTIS	352589
FL	INVERNESS	352344
FL	LADY LAKE	352753
FL	LEESBURG	352314
FL	LEESBURG	352315
FL	LEESBURG	352323
FL	LEESBURG	352326
FL	LEESBURG	352360
FL	LEESBURG	352742
FL	LEESBURG	352787
FL	MOUNT DORA	352383
FL	MT. DORA	352483
FL	OCALA	352237
FL	OCALA	352245
FL	OCALA	352347
FL	OCALA	352351
FL	OCALA	352368
FL	OCALA	352369
FL	OCALA	352390
FL	OCALA	352402
FL	OCALA	352629
FL	OCALA	352687
FL	OCALA	352732
FL	OCALA	352840
FL	OCALA	352854
FL	OCALA	352861
FL	OCALA	352867
FL	OCALA	352873
FL	ORLANDO	352429
FL	THE VILLAGES	352750
FL	WILDWOOD	352748
FL	DAYTONA BEACH	386226

FL	DAYTONA BEACH	386238
FL	DAYTONA BEACH	386239
FL	DAYTONA BEACH	386252
FL	DAYTONA BEACH	386253
FL	DAYTONA BEACH	386254
FL	DAYTONA BEACH	386255
FL	DAYTONA BEACH	386257
FL	DAYTONA BEACH	386258
FL	DAYTONA BEACH	386274
FL	DAYTONA BEACH	386323
FL	DAYTONA BEACH	386481
FL	DAYTONA BEACH	386676
FL	DAYTONA BEACH	386756
FL	DAYTONA BEACH	386947
FL	DE LAND	386736
FL	DE LAND	386738
FL	DE LEON SPRINGS	386985
FL	DELAND	386734
FL	DELAND	386738
FL	DELEON SPRINGS	386985
FL	EDGEWATER	386676
FL	HOLLY HILL	386257
FL	HOLLY HILL	386676
FL	HOLLY HILL	386756
FL	NEW SMYRNA BEAC	386427
FL	NEW SMYRNA BEAC	386478
FL	ORMOND BEACH	386615
FL	ORMOND BEACH	386672
FL	ORMOND BEACH	386673
FL	ORMOND BEACH	386676
FL	ORMOND BEACH	386677
FL	PALM COAST	386445
FL	PALM COAST	386446
FL	PALM COAST	386447
FL	PORT ORANGE	386756
FL	PORT ORANGE	386760
FL	PORT ORANGE	386763
FL	PORT ORANGE	386767
FL	PORT ORANGE	386788
FL	ALTAMONTE SPRINC	407248
FL	ALTAMONTE SPRINC	407291
FL	CAPE CANAVERAL	321853
FL	COCOA BEACH	321783
FL	COCOA BEACH	321784
FL	COCOA BEACH	321799
FL	COCOA	321636
FL	COCOA	321639
FL	DEBARY	386575
FL	DELTONA	386574
FL	HEATHROW (SEMINC	407444
FL	HEATHROW (SEMINC	407548
FL	HEATHROW (SEMINC	407829

FL	HEATHROW	407829
FL	INDIALANTIC	321777
FL	JACKSONVILLE	407872
FL	KISSIMMEE	407826
FL	LAKE BUENA VISTA	407226
FL	LAKE MARY (JANE)	407333
FL	LAKE MARY (JANE)	407562
FL	LAKE MARY (JANE)	407771
FL	LAKE MARY (JANE)	407804
FL	LAKE MARY (JANE)	407805
FL	LAKE MARY (JANE)	407829
FL	LAKE MARY (JANE)	407833
FL	LAKE MARY (JANE)	407995
FL	LAKE MARY	407323
FL	LAKE MARY	407330
FL	LAKE MARY	407333
FL	LAKE MARY	407444
FL	LAKE MARY	407804
FL	LAKE MARY	407805
FL	LAKE MARY	407829
FL	LOCKHART	407292
FL	MAITLAND	407670
FL	MAITLAND	407894
FL	MELBOURNE	321242
FL	MELBOURNE	321253
FL	MELBOURNE	321254
FL	MELBOURNE	321255
FL	MELBOURNE	321259
FL	MELBOURNE	321327
FL	MELBOURNE	321409
FL	MELBOURNE	321674
FL	MELBOURNE	321676
FL	MELBOURNE	321722
FL	MELBOURNE	321724
FL	MELBOURNE	321725
FL	MELBOURNE	321726
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FL	MELBOURNE	321729
FL	MELBOURNE	321751
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FL	MELBOURNE	321757
FL	MELBOURNE	321768
FL	MELBOURNE	321952
FL	MELBOURNE	321956
FL	MERRITT ISLAND	321452
FL	MERRITT ISLAND	321453
FL	MERRITT ISLAND	321454
FL	MERRITT ISLAND	321459
FL	MIMS	321267
FL	OCOEE	407292
FL	OCOEE	407293

FL	OCOEE	407294
FL	OCOEE	407578
FL	OCOEE	407822
FL	ORLANDO	321235
FL	ORLANDO	386668
FL	ORLANDO	407208
FL	ORLANDO	407226
FL	ORLANDO	407235
FL	ORLANDO	407236
FL	ORLANDO	407240
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FL	ORLANDO	407299
FL	ORLANDO	407313
FL	ORLANDO	407345
FL	ORLANDO	407351
FL	ORLANDO	407352
FL	ORLANDO	407354
FL	ORLANDO	407355
FL	ORLANDO	407356
FL	ORLANDO	407363
FL	ORLANDO	407370
FL	ORLANDO	407380
FL	ORLANDO	407381
FL	ORLANDO	407382
FL	ORLANDO	407384
FL	ORLANDO	407393
FL	ORLANDO	407420
FL	ORLANDO	407422
FL	ORLANDO	407423
FL	ORLANDO	407425
FL	ORLANDO	407438
FL	ORLANDO	407482
FL	ORLANDO	407503

FL	ORLANDO	407521
FL	ORLANDO	407522
FL	ORLANDO	407578
FL	ORLANDO	407648
FL	ORLANDO	407649
FL	ORLANDO	407658
FL	ORLANDO	407737
FL	ORLANDO	407816
FL	ORLANDO	407822
FL	ORLANDO	407823
FL	ORLANDO	407825
FL	ORLANDO	407826
FL	ORLANDO	407841
FL	ORLANDO	407843
FL	ORLANDO	407849
FL	ORLANDO	407850
FL	ORLANDO	407851
FL	ORLANDO	407852
FL	ORLANDO	407854
FL	ORLANDO	407855
FL	ORLANDO	407856
FL	ORLANDO	407857
FL	ORLANDO	407858
FL	ORLANDO	407859
FL	ORLANDO	407888
FL	ORLANDO	407894
FL	ORLANDO	407895
FL	ORLANDO	407896
FL	ORLANDO	407897
FL	ORLANDO	407898
FL	ORLANDO	407903
FL	ORLANDO	407926
FL	ORLANDO	407999
FL	ORMOND BEACH	407235
FL	OVIEDO	407326
FL	OVIEDO	407359
FL	OVIEDO	407365
FL	OVIEDO	407977
FL	PALM BAY	321726
FL	PALM BAY	321768
FL	PALM BAY	321951
FL	PALM BAY	321952
FL	PALM BAY	321956
FL	PATRICK AIR FORCE	321868
FL	PENSACOLA	321454
FL	ROCKLEDGE	321242
FL	ROCKLEDGE	321631
FL	ROCKLEDGE	321636
FL	SANFORD	407302
FL	SANFORD	407321
FL	SANFORD	407330
FL	SANFORD	407430

FL	TITUSVILLE	321268
FL	TITUSVILLE	321383
FL	W MELBOURNE	321956
FL	W. MELBOURNE	321674
FL	WEST MELBOURNE	321724
FL	WEST MELBOURNE	321727
FL	WINDERMERE	407294
FL	WINTER PARK	407384
FL	CELEBRATION	407566
FL	KISSIMMEE	407566
FL	LAKE BUENA VISTA	407560
FL	LAKE BUENA VISTA	407566
FL	LAKE BUENA VISTA	407824
FL	LAKE BUENA VISTA	407827
FL	LAKE BUENA VISTA	407828
FL	LAKE BUENA VISTA	407934
FL	LAKE BUENA VISTA	407938
FL	LAKE BUENA VISTA	407939
FL	ORLANDO	407827
FL	ORLANDO	407934
FL	ORLANDO	407938
FL	ALTAMONTE SPRING	407644
FL	ALTAMONTE SPRING	407260
FL	ALTAMONTE SPRING	407331
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FL	ALTAMONTE SPRING	407869
FL	APOPKA	407880
FL	APOPKA	407884
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FL	APOPKA	407889
FL	CASSELBERRY	407260
FL	CASSELBERRY	407332
FL	CASSELBERRY	407339
FL	CASSELBERRY	407834
FL	DELTONA	386532
FL	DELTONA	386789
FL	FERN PARK	407830
FL	FORT PIERCE	407465
FL	HEATHROW (SEMINOLE)	407304
FL	HEATHROW (SEMINOLE)	407357
FL	KISSIMMEE	407390
FL	KISSIMMEE	407396
FL	KISSIMMEE	407397

FL	KISSIMMEE	407931
FL	KISSIMMEE	407932
FL	KISSIMMEE	407933
FL	KISSIMMEE	407935
FL	KISSIMMEE	407944
FL	LAKE HELEN	386228
FL	LAKE MARY (JANE)	407357
FL	LAKE MARY (JANE)	407513
FL	LAKE MARY	407712
FL	LONGWOOD	407260
FL	LONGWOOD	407331
FL	LONGWOOD	407682
FL	LONGWOOD	407695
FL	LONGWOOD	407767
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FL	LONGWOOD	407869
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FL	MAITLAND	407875
FL	OKEECHOBEE	407436
FL	ORANGE CITY	386774
FL	ORANGE CITY	386775
FL	ORANGE CITY	386851
FL	ORANGE CITY	386917
FL	ORANGE CITY	407774
FL	ORLANDO	407206
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FL	ORLANDO	407303
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FL	ORLANDO	407660
FL	ORLANDO	407909
FL	SANFORD	407332
FL	ST PETERSBURG	407875
FL	WINTER GARDEN	407656
FL	WINTER PARK	407539
FL	WINTER PARK	407623
FL	WINTER PARK	407646

FL	WINTER PARK	407657
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FL	WINTER PARK	407740
FL	WINTER PARK	407975
FL	WINTER SPRINGS	407696
FL	WINTER SPRINGS	407699
FL	YEEHAW JUNCTION	407344
FL	ORLANDO	321436
FL	AVENTURA	305933
FL	BAL HARBOUR	305864
FL	BAL HARBOUR	305865
FL	BOCA RATON	561208
FL	COCONUT CREEK	954590
FL	COCONUT CREEK	954971
FL	COCONUT CREEK	954972
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FL	COCONUT GROVE	305448
FL	COCONUT GROVE	305858
FL	CORAL GABLES	305420
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FL	CORAL SPRINGS	954796
FL	CUTLER RIDGE	305259
FL	CUTLER RIDGE	305278
FL	DANIA	954920
FL	DANIA	954921
FL	DAVIE	305937
FL	DAVIE	954236



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FL	DAVIE	954316
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FL	DAVIE	954476
FL	DAVIE	954625
FL	DAVIE	954680
FL	DEERFIELD BCH	954360
FL	DEERFIELD BEACH	954418
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FL	DEERFIELD BEACH	954725
FL	DELRAY BEACH	561450
FL	FL LAUDERDALE	954566
FL	FLORIDA CITY	786243
FL	FORT LAUDERDALE	954202
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FL	HALLANDALE	954457
FL	HALLANDALE	954458
FL	HIALEAH GARDENS	305556
FL	HIALEAH	305362
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FL	HIALEAH	786413
FL	HOLLANDALE	954456
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FL	HOMESTEAD	305767
FL	ISLAMORADA	305664
FL	JACKSONVILLE	954476
FL	KEY BISCAYNE	305365
FL	KEY WEST	305292
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FL	KEY WEST	305296
FL	LAKE WORTH	561207
FL	LAUDER HILL	954572
FL	LAUDER HILL	954578
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FL	LAUDERDALE BY TH	954493
FL	LAUDERDALE BY TH	954776
FL	LAUDERDALE LAKE§	954485
FL	LAUDERDALE LAKE§	954486
FL	LAUDERDALE LAKE§	954714
FL	LAUDERDALE LAKE§	954717
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FL	LAUDERHILL	954741
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FL	N. MIAMI BEACH	305932
FL	NORTH LAUDERDAL	954597
FL	NORTH LAUDERDAL	954720
FL	NORTH LAUDERDAL	954971
FL	NORTH MIAMI BEACH	305933
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FL	NORTH MIAMI	305944
FL	NORTH MIAMI	305981
FL	OAKLAND PARK	954630
FL	OAKLAND PARK	954733
FL	OAKLAND PARK	954776
FL	OPA LOCKA	305599
FL	OPA LOCKA	305681
FL	PARKLAND	954340
FL	PEMBROKE PARK	954458
FL	PEMBROKE PARK	954965
FL	PEMBROKE PINES	954430
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FL	POMPANO BEACH	954978
FL	PORT ST LUCIE	954622
FL	ROYAL PALM BEACH	561207
FL	SOUTH MIAMI	305740
FL	SUNRISE	954623
FL	SUNRISE	954626
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FL	SUNRISE	954858
FL	SURFSIDE	305861
FL	TAMARAC	954467
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FL	TAMARAC	954777
FL	TAVERNIER	305853
FL	VIRGINIA GARDENS	305871
FL	WEST PALM BEACH	561207
FL	WEST PALM BEACH	954435
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FL	WESTON	954217
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FL	ATLANTIS	561965
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FL	GREEN ACRES	561641
FL	GREENACRES CITY	561963
FL	JENSEN BEACH	772232
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FL	LAKE PARK	561625

FL	LAKE PARK	561882
FL	LAKE WORTH	561533
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FL	LAKE WORTH	561964
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FL	LAKE WORTH	561968
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FL	LANTANA	561585
FL	LOXAHATCHEE	561798
FL	MANALAPAN	561533
FL	NORTH PALM BEACH	561626
FL	NORTH PALM BEACH	561627
FL	NORTH PALM BEACH	561694
FL	PALM BEACH GARDENS	561622
FL	PALM BEACH GARDENS	561776
FL	PALM BEACH GARDENS	561845
FL	PALM BEACH GARDENS	561881
FL	PALM BEACH SHORES	561863
FL	PALM BEACH SHORES	561882
FL	PALM BEACH	561586
FL	PALM BEACH	561624
FL	PALM BEACH	561655
FL	PALM BEACH	561659
FL	PALM BEACH	561776
FL	PALM BEACH	561832
FL	PALM BEACH	561835
FL	PORT SAINT LUCIE	772335
FL	PORT ST LUCIE	772335
FL	PORT ST LUCIE	772337
FL	PORT ST LUCIE	772344
FL	PORT ST LUCIE	772398
FL	PORT ST LUCIE	772878
FL	POT ST LUCIE	772337
FL	RIVIERA BEACH	561622
FL	RIVIERA BEACH	561848
FL	ROYAL PALM BEACH	561333
FL	ROYAL PALM BEACH	561784
FL	ROYAL PALM BEACH	561793
FL	SEBASTIAN	772388
FL	SINGER ISLAND	561842
FL	STUART	772221
FL	STUART	772223
FL	STUART	772225
FL	STUART	772283
FL	STUART	772288
FL	STUART	772692
FL	TEQUESTA	561746
FL	TEQUESTA	561747
FL	VERO BEACH	772231
FL	VERO BEACH	772234
FL	VERO BEACH	772562

FL	VERO BEACH	772563
FL	VERO BEACH	772567
FL	VERO BEACH	772569
FL	VERO BEACH	772770
FL	VERO BEACH	772778
FL	VERO BEACH	772794
FL	WELLINGTON	561784
FL	WELLINGTON	561792
FL	WELLINGTON	561798
FL	WEST PALM BEACH	561227
FL	WEST PALM BEACH	561432
FL	WEST PALM BEACH	561471
FL	WEST PALM BEACH	561478
FL	WEST PALM BEACH	561616
FL	WEST PALM BEACH	561620
FL	WEST PALM BEACH	561622
FL	WEST PALM BEACH	561627
FL	WEST PALM BEACH	561640
FL	WEST PALM BEACH	561650
FL	WEST PALM BEACH	561655
FL	WEST PALM BEACH	561659
FL	WEST PALM BEACH	561681
FL	WEST PALM BEACH	561683
FL	WEST PALM BEACH	561684
FL	WEST PALM BEACH	561686
FL	WEST PALM BEACH	561687
FL	WEST PALM BEACH	561688
FL	WEST PALM BEACH	561689
FL	WEST PALM BEACH	561694
FL	WEST PALM BEACH	561697
FL	WEST PALM BEACH	561712
FL	WEST PALM BEACH	561784
FL	WEST PALM BEACH	561790
FL	WEST PALM BEACH	561793
FL	WEST PALM BEACH	561832
FL	WEST PALM BEACH	561833
FL	WEST PALM BEACH	561837
FL	WEST PALM BEACH	561844
FL	WEST PALM BEACH	561845
FL	WEST PALM BEACH	561881
FL	WEST PALM BEACH	561966
FL	WPB	561689
FL	FORT PIERCE	561452
FL	MIAMI LAKES	305421
FL	PALM BEACH	561305
FL	PLANTATION	954326
FL	ARCADIA	863494
FL	OKEECHOBEE	863763
FL	SEBRING	863382
FL	SEBRING	863402
FL	SEBRING	863471
FL	SEBRING	863655

FL	ALVA	863675
FL	BOCA RATON	239262
FL	BONITA SPRINGS	239498
FL	BONITA SPRINGS	239947
FL	BONITA SPRINGS	239948
FL	BONITA SPRINGS	239949
FL	BONITA SPRINGS	239992
FL	CAPE CORAL	239458
FL	CAPE CORAL	239540
FL	CAPE CORAL	239542
FL	CAPE CORAL	239549
FL	CAPE CORAL	239573
FL	CAPE CORAL	239574
FL	CAPE CORAL	239772
FL	CLEWISTON	863983
FL	CYPRESS LAKE	239432
FL	EL JOBEAN	941697
FL	FORT MEYERS	239656
FL	FORT MYERS	239275
FL	FORT MYERS	239277
FL	FORT MYERS	239278
FL	FORT MYERS	239332
FL	FORT MYERS	239334
FL	FORT MYERS	239415
FL	FORT MYERS	239432
FL	FORT MYERS	239433
FL	FORT MYERS	239437
FL	FORT MYERS	239466
FL	FORT MYERS	239479
FL	FORT MYERS	239482
FL	FORT MYERS	239599
FL	FORT MYERS	239656
FL	FORT MYERS	239693
FL	FORT MYERS	239694
FL	FORT MYERS	239768
FL	FORT MYERS	239896
FL	FORT MYERS	239931
FL	FORT MYERS	239936
FL	FORT MYERS	239939
FL	FT MYERS BEACH	239463
FL	FT MYERS	239275
FL	FT MYERS	239332
FL	FT MYERS	239337
FL	FT MYERS	239482
FL	FT MYERS	239936
FL	FT MYERS	239939
FL	FT. MYERS	239437
FL	LEHIGH ACRES	239369
FL	MARCO ISLAND	239394
FL	MARCO ISLAND	239642
FL	NAPLES	239254
FL	NAPLES	239261

FL	NAPLES	239262
FL	NAPLES	239263
FL	NAPLES	239275
FL	NAPLES	239348
FL	NAPLES	239352
FL	NAPLES	239353
FL	NAPLES	239430
FL	NAPLES	239434
FL	NAPLES	239435
FL	NAPLES	239455
FL	NAPLES	239566
FL	NAPLES	239591
FL	NAPLES	239593
FL	NAPLES	239596
FL	NAPLES	239597
FL	NAPLES	239598
FL	NAPLES	239601
FL	NAPLES	239643
FL	NAPLES	239659
FL	NAPLES	239732
FL	NAPLES	239774
FL	NAPLES	239775
FL	NAPLES	239793
FL	NAPLES	239948
FL	NORTH NAPLES	239263
FL	NORTH NAPLES	239593
FL	PAGE PARK PINE MA	239936
FL	PORT CHARLOTTE	941235
FL	PORT CHARLOTTE	941255
FL	PORT CHARLOTTE	941421
FL	PORT CHARLOTTE	941629
FL	PORT CHARLOTTE	941743
FL	PORT CHARLOTTE	941764
FL	PUNTA GORDA	941255
FL	PUNTA GORDA	941637
FL	PUNTA GORDA	941639
FL	SAINT JAMES CITY	239558
FL	TICE	239694
FL	AUBURNDALE	863965
FL	AUBURNDALE	863967
FL	BARTOW	863533
FL	BAYOU	727572
FL	BEACH PARK	813207
FL	BEACH PARK	813281
FL	BEACH PARK	813639
FL	BELLEAIR BLUFFS	727584
FL	BELLEAIR BLUFFS	727585
FL	BRADENTON BAY	941753
FL	BRADENTON	941358
FL	BRADENTON	941526
FL	BRADENTON	941708
FL	BRADENTON	941739

FL	BRADENTON	941745
FL	BRADENTON	941746
FL	BRADENTON	941747
FL	BRADENTON	941748
FL	BRADENTON	941751
FL	BRADENTON	941753
FL	BRADENTON	941755
FL	BRADENTON	941756
FL	BRADENTON	941792
FL	BRANDON	813643
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FL	BRANDON	813661
FL	BRANDON	813681
FL	BRANDON	813684
FL	BRANDON	813685
FL	BRANDON	813689
FL	BRANDON	813793
FL	BRANDON	813952
FL	BRANDON	813957
FL	CARROLLWOOD	813931
FL	CARROLLWOOD	813962
FL	CARROLLWOOD	813963
FL	CITRUS RIDGE	863420
FL	CLEARWATER	727299
FL	CLEARWATER	727441
FL	CLEARWATER	727442
FL	CLEARWATER	727445
FL	CLEARWATER	727449
FL	CLEARWATER	727467
FL	CLEARWATER	727507
FL	CLEARWATER	727524
FL	CLEARWATER	727531
FL	CLEARWATER	727533
FL	CLEARWATER	727535
FL	CLEARWATER	727536
FL	CLEARWATER	727539
FL	CLEARWATER	727572
FL	CLEARWATER	727573
FL	CLEARWATER	727584
FL	CLEARWATER	727596
FL	CLEARWATER	727669
FL	CLEARWATER	727723
FL	CLEARWATER	727724
FL	CLEARWATER	727726
FL	CLEARWATER	727784
FL	CLEARWATER	727796
FL	CLEARWATER	727797
FL	CLEARWATER	727799
FL	CLEARWATER	727953

FL	CLEARWATER	727954
FL	COUNTRYSIDE	727726
FL	COUNTRYSIDE	727796
FL	DOVER	813659
FL	DUNEDIN	727733
FL	DUNEDIN	727734
FL	DUNEDIN	727736
FL	DUNEDIN	727738
FL	ELLENTON	941721
FL	ELLENTON	941722
FL	ELLENTON	941729
FL	ENGLEWOOD	941474
FL	ENGLEWOOD	941475
FL	FEATHER SOUND	727571
FL	FEATHER SOUND	727572
FL	FEATHER SOUND	727575
FL	FEATHER SOUND	727954
FL	HAINES CITY	863422
FL	HIGHLANDS	863647
FL	HOLIDAY	727943
FL	HUDSON	727856
FL	HUDSON	727863
FL	HUDSON	727869
FL	HYDE PARK	813844
FL	INDIAN ROCKS (BEA	727595
FL	JACKSONVILLE	813478
FL	LAKE WALES	863676
FL	LAKE WALES	863679
FL	LAKELAND	863413
FL	LAKELAND	863499
FL	LAKELAND	863513
FL	LAKELAND	863585
FL	LAKELAND	863644
FL	LAKELAND	863646
FL	LAKELAND	863647
FL	LAKELAND	863648
FL	LAKELAND	863665
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FL	LAKELAND	863709
FL	LAKELAND	863802
FL	LAKELAND	863815
FL	LAKELAND	863816
FL	LAKELAND	863853
FL	LAKELAND	863859
FL	LARGO	727320
FL	LARGO	727530
FL	LARGO	727535
FL	LARGO	727536



FL	LARGO	727559
FL	LARGO	727586
FL	LARGO	727596
FL	LARGO	727954
FL	LEALMAN	727522
FL	LEALMAN	727527
FL	LONGBOAT KEY	727838
FL	LONGBOAT KEY	941383
FL	LUTZ	813948
FL	LUTZ	813991
FL	MULBERRY	863425
FL	MULBERRY	863428
FL	NEW PORT RICHEY	727232
FL	NEW PORT RICHEY	727375
FL	NEW PORT RICHEY	727841
FL	NEW PORT RICHEY	727844
FL	NEW PORT RICHEY	727848
FL	NEW PORT RICHEY	727849
FL	NORTH REDINGTON	727391
FL	NORTHSIDE	941355
FL	OLDSMAR	813366
FL	OLDSMAR	813854
FL	OLDSMAR	813855
FL	ORLANDO	813470
FL	PALM HARBOR	727773
FL	PALM HARBOR	727785
FL	PALM HARBOR	727787
FL	PALM HARBOR	727789
FL	PALM HARBOR	727942
FL	PALMETTO	941721
FL	PALMETTO	941723
FL	PINELLAS PARK	727541
FL	PINELLAS PARK	727545
FL	PINELLAS PARK	727546
FL	PINELLAS PARK	727576
FL	PINELLAS PARK	727578
FL	PINELLAS PARK	727954
FL	PINELLAS	727539
FL	PLANT CITY	813707
FL	PLANT CITY	813745
FL	PLANT CITY	813752
FL	PLANT CITY	813754
FL	PLANT CITY	813757
FL	PORT RICHEY	727841
FL	PORT RICHEY	727848
FL	PORT RICHEY	727868
FL	PORT RICHEY	727869
FL	RIVERVIEW	813487
FL	RIVERVIEW	813635
FL	RIVERVIEW	813662
FL	RIVERVIEW	813671
FL	RIVERVIEW	813677

FL	ROTONDA	941961
FL	RUSKIN	813641
FL	RUSKIN	813952
FL	SAINT PETERSBURG	727384
FL	SAINT PETERSBURG	727502
FL	SAINT PETERSBURG	727572
FL	SARASOTA	941331
FL	SARASOTA	941351
FL	SARASOTA	941355
FL	SARASOTA	941358
FL	SARASOTA	941360
FL	SARASOTA	941361
FL	SARASOTA	941364
FL	SARASOTA	941365
FL	SARASOTA	941366
FL	SARASOTA	941371
FL	SARASOTA	941373
FL	SARASOTA	941377
FL	SARASOTA	941378
FL	SARASOTA	941379
FL	SARASOTA	941388
FL	SARASOTA	941552
FL	SARASOTA	941739
FL	SARASOTA	941758
FL	SARASOTA	941906
FL	SARASOTA	941923
FL	SARASOTA	941925
FL	SARASOTA	941953
FL	SARASOTA	941954
FL	SARASOTA	941955
FL	SARASOTA	941961
FL	SEMINOLE	727399
FL	SKYWAY	727321
FL	SOUTH SARASOTA	941921
FL	SOUTH SARASOTA	941923
FL	SOUTHSIDE (SARAS	941921
FL	SPRINGS	941371
FL	ST PETERSBURG	727341
FL	ST PETERSBURG	727343
FL	ST PETERSBURG	727344
FL	ST PETERSBURG	727345
FL	ST PETERSBURG	727347
FL	ST PETERSBURG	727381
FL	ST PETERSBURG	727507
FL	ST PETERSBURG	727521
FL	ST PETERSBURG	727544
FL	ST PETERSBURG	727545
FL	ST PETERSBURG	727556
FL	ST PETERSBURG	727567
FL	ST PETERSBURG	727572
FL	ST PETERSBURG	727573
FL	ST PETERSBURG	727576

FL	ST PETERSBURG	727577
FL	ST PETERSBURG	727578
FL	ST PETERSBURG	727579
FL	ST PETERSBURG	727622
FL	ST PETERSBURG	727820
FL	ST PETERSBURG	727822
FL	ST PETERSBURG	727827
FL	ST PETERSBURG	727892
FL	ST PETERSBURG	727893
FL	ST PETERSBURG	727894
FL	ST PETERSBURG	727896
FL	ST PETERSBURG	727898
FL	ST PETERSBURG	727954
FL	ST. PETERSBURG	727322
FL	ST. PETERSBURG	727327
FL	ST. PETERSBURG	727347
FL	SULPHUR SPRINGS	813933
FL	SUN CITY CENTER	813633
FL	TAMPA	813207
FL	TAMPA	813221
FL	TAMPA	813222
FL	TAMPA	813223
FL	TAMPA	813225
FL	TAMPA	813226
FL	TAMPA	813227
FL	TAMPA	813228
FL	TAMPA	813229
FL	TAMPA	813231
FL	TAMPA	813237
FL	TAMPA	813243
FL	TAMPA	813246
FL	TAMPA	813247
FL	TAMPA	813249
FL	TAMPA	813253
FL	TAMPA	813259
FL	TAMPA	813261
FL	TAMPA	813264
FL	TAMPA	813265
FL	TAMPA	813273
FL	TAMPA	813281
FL	TAMPA	813282
FL	TAMPA	813286
FL	TAMPA	813287
FL	TAMPA	813288
FL	TAMPA	813289
FL	TAMPA	813290
FL	TAMPA	813313
FL	TAMPA	813314
FL	TAMPA	813342
FL	TAMPA	813350
FL	TAMPA	813351
FL	TAMPA	813353

FL	TAMPA	813356
FL	TAMPA	813487
FL	TAMPA	813554
FL	TAMPA	813558
FL	TAMPA	813604
FL	TAMPA	813612
FL	TAMPA	813615
FL	TAMPA	813620
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FL	TAMPA	813639
FL	TAMPA	813651
FL	TAMPA	813661
FL	TAMPA	813663
FL	TAMPA	813664
FL	TAMPA	813681
FL	TAMPA	813684
FL	TAMPA	813744
FL	TAMPA	813775
FL	TAMPA	813792
FL	TAMPA	813806
FL	TAMPA	813829
FL	TAMPA	813831
FL	TAMPA	813835
FL	TAMPA	813839
FL	TAMPA	813870
FL	TAMPA	813871
FL	TAMPA	813873
FL	TAMPA	813874
FL	TAMPA	813875
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FL	TAMPA	813885
FL	TAMPA	813886
FL	TAMPA	813887
FL	TAMPA	813888
FL	TAMPA	813890
FL	TAMPA	813901
FL	TAMPA	813902

FL	TAMPA	813903
FL	TAMPA	813908
FL	TAMPA	813920
FL	TAMPA	813926
FL	TAMPA	813930
FL	TAMPA	813932
FL	TAMPA	813933
FL	TAMPA	813935
FL	TAMPA	813951
FL	TAMPA	813952
FL	TAMPA	813957
FL	TAMPA	813960
FL	TAMPA	813962
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FL	TAMPA	813969
FL	TAMPA	813971
FL	TAMPA	813972
FL	TAMPA	813975
FL	TAMPA	813977
FL	TAMPA	813978
FL	TAMPA	813979
FL	TAMPA	813980
FL	TAMPA	813998
FL	TAMPA	863619
FL	TARPON SPRINGS	727934
FL	TARPON SPRINGS	727939
FL	TARPON SPRINGS	813818
FL	TEMPLE TERRACE	813313
FL	TEMPLE TERRACE	813631
FL	TEMPLE TERRACE	813664
FL	TEMPLE TERRACE	813952
FL	TEMPLE TERRACE	813978
FL	TOWN 'N' COUNTRY	813313
FL	TOWN 'N' COUNTRY	813888
FL	UNIVERSITY PARK	941360
FL	UNIVERSITY	813632
FL	UNIVERSITY	813972
FL	VALRICO	813643
FL	VALRICO	813655
FL	VAMO	941918
FL	VAMO	941966
FL	VENICE	941408
FL	VENICE	941484
FL	VENICE	941485
FL	VENICE	941488
FL	VENICE	941492
FL	VENICE	941493
FL	VENICE	941497
FL	VENICE	941961
FL	WALLCRAFT	813805
FL	WESLEY CHAPEL	813973
FL	WESTSIDE (PART OF	813289

FL	WESTSIDE (PART OF 813354	
FL	WESTSIDE (PART OF 813877	
FL	WESTSIDE (PART OF 813878	
FL	WINTER HAVEN	863293
FL	WINTER HAVEN	863294
FL	WINTER HAVEN	863299
FL	WINTER HAVEN	863318
FL	WINTER HAVEN	863401
FL	WINTER HAVEN	863965
FL	YBOR CITY	813241
FL	YBOR CITY	813248
FL	YBOR CITY	813386
FL	ZEPHYRHILLS	813715
FL	MADISON	850973
FL	TALLAHASSEE	850219
FL	TALLAHASSEE	850222
FL	TALLAHASSEE	850224
FL	TALLAHASSEE	850298
FL	TALLAHASSEE	850309
FL	TALLAHASSEE	850329
FL	TALLAHASSEE	850350
FL	TALLAHASSEE	850383
FL	TALLAHASSEE	850385
FL	TALLAHASSEE	850386
FL	TALLAHASSEE	850402
FL	TALLAHASSEE	850422
FL	TALLAHASSEE	850425
FL	TALLAHASSEE	850553
FL	TALLAHASSEE	850561
FL	TALLAHASSEE	850562
FL	TALLAHASSEE	850575
FL	TALLAHASSEE	850599
FL	TALLAHASSEE	850656
FL	TALLAHASSEE	850668
FL	TALLAHASSEE	850671
FL	TALLAHASSEE	850681
FL	TALLAHASSEE	850877
FL	TALLAHASSEE	850878
FL	TALLAHASSEE	850906
FL	TALLAHASSEE	850942
FL	DAYTONA BEACH	UNKNOWN
FL	FEATHER SOUND	UNKNOWN

**Grand Totals**

Proprietary Restricted

\*These counts include both UNE-L & UNE-P provisioned loops  
current data does not provide a method for disaggregation

FL - LNS data as of Sept. 03			Derived #
STATE	CITY	NPANXX	VGE
FL	APOPKA	407880	
FL	APOPKA	407884	
FL	APOPKA	407886	
FL	APOPKA	407889	
FL	BARTOW	863519	
FL	BARTOW	863533	
FL	BARTOW	863533	
FL	BOCA RATON	561218	
FL	BOCA RATON	561241	
FL	BOCA RATON	561241	
FL	BOCA RATON	561241	
FL	BOCA RATON	561338	
FL	BOCA RATON	561347	
FL	BOCA RATON	561361	
FL	BOCA RATON	561362	
FL	BOCA RATON	561367	
FL	BOCA RATON	561367	
FL	BOCA RATON	561368	
FL	BOCA RATON	561368	
FL	BOCA RATON	561391	
FL	BOCA RATON	561391	
FL	BOCA RATON	561392	
FL	BOCA RATON	561392	
FL	BOCA RATON	561393	
FL	BOCA RATON	561394	
FL	BOCA RATON	561395	
FL	BOCA RATON	561395	
FL	BOCA RATON	561416	
FL	BOCA RATON	561417	
FL	BOCA RATON	561417	
FL	BOCA RATON	561447	
FL	BOCA RATON	561451	
FL	BOCA RATON	561479	
FL	BOCA RATON	561483	
FL	BOCA RATON	561487	
FL	BOCA RATON	561620	
FL	BOCA RATON	561620	
FL	BOCA RATON	561750	
FL	BOCA RATON	561750	
FL	BOCA RATON	561883	
FL	BOCA RATON	561893	
FL	BOCA RATON	561912	
FL	BOCA RATON	561982	
FL	BOCA RATON	561982	

FL	BOCA RATON	561988
FL	BOCA RATON	561988
FL	BOCA RATON	561989
FL	BOCA RATON	561989
FL	BOCA RATON	561994
FL	BOCA RATON	561995
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FL	BOCA RATON	561997
FL	BOCA RATON	561997
FL	BOCA RATON	561998
FL	BOCA RATON	561998
FL	BOCA RATON	561998
FL	BOCA RATON	561999
FL	BOYNTON BE	561369
FL	BOYNTON BE	561374
FL	BOYNTON BE	561731
FL	BOYNTON BE	561732
FL	BOYNTON BE	561733
FL	BOYNTON BE	561735
FL	BOYNTON BE	561736
FL	BOYNTON BE	561737
FL	BOYNTON BE	561738
FL	BOYNTON BE	561740
FL	BRADENTON	941708
FL	BRADENTON	941727
FL	BRADENTON	941739
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AT&T Responses to BellSouth's First Set of Interrogatories  
Attachment 6c -- Responsive Document to Interrogatory No. 6  
October 31, 2003

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AT&T Responses to BellSouth's First Set of Interrogatories  
Attachment 6c -- Responsive Document to Interrogatory No. 6  
October 31, 2003

FL	TAMPA	813248
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October 31, 2003

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October 31, 2003

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FL		850691
FL		850692
FL		954885





<u>STATE</u>	<u>CLLI CD</u>	<u>CLLI8</u>	<u>PLTCDE</u>	<u>LOCN NAME</u>	<u>MSA NAME</u>
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		Data
LSO8	City	* UNE-P Lines
ABDLFLXA	AUBURNDALE	
ALFAFLXA	ALAFIA	
ANMRFLXA	ANNA MARIA	
BARTFLXA	BARTOW	
BAYUFLXA	BAYOU	
BBPKFLXA	BABSON PARK	
BCRTFLBT	BOCA RATON	
BCRTFLMA	BOCA RATON	
BCRTFLSA	BOCA RATON	
BGPIFLMA	BIG PINE KEY	
BHPKFLXA	BEACH PARK	
BKVLFLJF	BROOKSVILLE	
BLDWFLMA	BALDWIN	
BLGLFLMA	BELLE GLADE	
BNNLFLMA	BUNNELL	
BRBAFLXA	BRADENTON BAY	
BRNDFLXA	BRANDON	
BRSNFLMA	BRONSON	
BRTNFLXX	BRADENTON	
BYBHFLMA	BOYNTON BEACH	
CCBHFLMA	COCOA BEACH	
CDKYFLMA	CEDAR KEY	
CFLDFLMA	CHIEFLAND	
CHPLFLJA	CHIPLEY	
CLWRFLXA	CLEARWATER	
CNSDFLXA	COUNTRYSIDE	
CNTMFLLE	CANTONMENT	
COCOFLMA	COCOA	
COCOFLME	MERRITT ISLAND	
CRWDFLXA	CARROLLWOOD	
CSCYFLBA	CROSS CITY	
CYGRFLXA	CYPRESS GARDENS	
DBRYFLDL	DELTONA	
DBRYFLMA	DEBARY	
DELDFLMA	DE LAND	
DLBHFLKP	DELRAY BEACH	
DLBHFLMA	DELRAY BEACH	
DNDNFLXA	DUNEDIN	
DNLNFLWM	DUNNELLON	

AT&T's Response to BellSouth's First Set of Interrogatories  
Attachment 12 Responsive Document  
To Interrogatory 12.  
October 31, 2003

DRBHFLMA	DEERFIELD BEACH	
DUNDFLXA	DUNDEE	
DYBHFLFN	DAYTONA BEACH	
DYBHFLMA	DAYTONA BEACH	
DYBHFLOB	ORMOND BEACH	
DYBHFLOS	ORMOND BEACH	
DYBHFLPO	DAYTONA BEACH	
EGLLFLBG	MELBOURNE	
EGLLFLIH	EAU GALLIE	
ENWDFLXA	ENGLEWOOD	
FHSDFLXA	FEATHER SOUND	
FLBHFLMA	FLAGLER BEACH	
FRBHFLFP	FERNANDINA BEACH	
FRSTFLXA	FROSTPROOF	
FTGRFLMA	FORT GEORGE	
FTLDFL92	FORT LAUDERDALE	
FTLDFLAM	FORT LAUDERDALE	
FTLDFLCR	FORT LAUDERDALE	
FTLDFLCY	FORT LAUDERDALE	
FTLDFLJA	PLANTATION	
FTLDFLMR	FORT LAUDERDALE	
FTLDFLOA	FORT LAUDERDALE	
FTLDFLOV	FORT LAUDERDALE	
FTLDFLPL	PLANTATION	
FTLDFLSG	SUNRISE	
FTLDFLSU	SUNRISE	
FTLDFLWA	FORT LAUDERDALE	
FTLDFLWN	FORT LAUDERDALE	
FTPRFLMA	FT PIERCE	
GCSPFLCN	GREEN COVE SPRINGS	
GCVLFLMA	GRACEVILLE	
GENVFLMA	GENEVA	
GLBRFLMC	GULF BREEZE	
GNDYFLXA	GANDY	
GSVLFLMA	GAINESVILLE	
GSVLFLNW	GAINESVILLE	
HAVNFLMA	HAVANA	
HBSDFLMA	HOBE SOUND	
HDSNFLXA	HUDSON	
HGLDFLXA	HIGHLANDS	
HILHFLEG	HIALEAH	
HLNVFLMA	NAVARRE	
HLWDFLHA	HALLANDALE	
HLWDFLMA	HOLLYWOOD	
HLWDFLPE	PEMBROKE PINES	
HLWDFLWH	HOLLYWOOD	
HMSTFLHM	HOMESTEAD	
HMSTFLNA	HOMESTEAD	

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HNCYFLXA	HAINES CITY	
HNCYFLXN	HAINES CITY	
HTISFLMA	JENSEN BEACH	
HYPKFLXA	HYDE PARK	
INRKFLXX	INDIAN ROCKS (BEACH)	
INVRFLXA	INVERNESS	
ISLMFLMA	ISLAMORADA	
JAY FLMA	JAY	
JCBHFLAB	JACKSONVILLE	
JCBHFLMA	JACKSONVILLE BEACH	
JCBHFLSP	JACKSONVILLE	
JCVLFLAR	JACKSONVILLE	
JCVLFLBW	JACKSONVILLE	
JCVLFLCL	JACKSONVILLE	
JCVLFLFC	JACKSONVILLE	
JCVLFLIA	JACKSONVILLE	
JCVLFLJT	JACKSONVILLE	
JCVLFLKJ	JACKSONVILLE	
JCVLFLLF	JACKSONVILLE	
JCVLFLNO	JACKSONVILLE	
JCVLFLOW	JACKSONVILLE	
JCVLFLRV	JACKSONVILLE	
JCVLFLSJ	JACKSONVILLE	
JCVLFLSM	JACKSONVILLE	
JCVLFLWC	JACKSONVILLE	
JPTRFLMA	JUPITER	
KYHGFLMA	KEYSTONE HEIGHTS	
KYLRFLLS	KEY LARGO	
KYLRFLMA	ROCK HARBOR	
KYSTFLXA	KEYSTONE (PART OF TAMPA)	
KYWSFLMA	KEY WEST	
LGBKFLXA	LONGBOAT KEY	
LKALFLXA	LAKE ALFRED	
LKCYFLMA	LAKE CITY	
LKLDFLXA	LAKELAND	
LKLDFLXE	LAKELAND	
LKLDFLXN	LAKELAND	
LKMRFLHE	LAKE MARY	
LKMRFLMF	LAKE MARY	
LKWFLFLXA	LAKE WALES	
LLMNFLXA	LEALMAN	
LNLKFLXA	LAND O LAKES	
LRGOFLXA	LARGO	
LUTZFLXA	LUTZ	
LYHNFLOH	LYNN HAVEN	
MCNPFLMA	MICANOPY	
MDBGFLPM	MIDDLEBURG	
MIAMFLAE	CORAL GABLES	

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MIAMFLAL	MIAMI	
MIAMFLAP	MIAMI	
MIAMFLBA	MIAMI	
MIAMFLBC	MIAMI	
MIAMFLBR	MIAMI BEACH	
MIAMFLCA	MIAMI	
MIAMFLDA	MIAMI	
MIAMFLDB	MIAMI	
MIAMFLFL	MIAMI	
MIAMFLGR	MIAMI	
MIAMFLHL	HIALEAH	
MIAMFLIC	MIAMI BEACH	
MIAMFLKE	KEY BISCAYNE	
MIAMFLME	MIAMI	
MIAMFLNM	NORTH MIAMI	
MIAMFLNS	MIAMI	
MIAMFLOL	OPA LOCKA	
MIAMFLPB	MIAMI SPRINGS	
MIAMFLPL	MIAMI	
MIAMFLRR	MIAMI	
MIAMFLSH	MIAMI	
MIAMFLSO	MIAMI	
MIAMFLWD	MIAMI	
MIAMFLWM	WEST MIAMI	
MIANFLYI	MIAMI	
MIAQFL06	MIAMI	
MICCFLLB	MICCO	
MLBRFLMA	MELBOURNE	
MLBYFLXA	MULBERRY	
MLTNFLRA	MILTON	
MNDRFLAV	JACKSONVILLE	
MNDRFLLO	JACKSONVILLE	
MNDRFLLW	JACKSONVILLE	
MNLKFLXA	MOON LAKE	
MRTHFLVE	MARATHON	
MXVLFLMA	JACKSONVILLE	
NDADFLAC	NORTH MIAMI BEACH	
NDADFLBR	MIAMI	
NDADFLGG	MIAMI	
NDADFLLO	MIAMI	
NGBHFLXA	NORTH GULF BEACH	
NKLRFLMA	NORTH KEY LARGO	
NPRCFLXA	NEW PORT RICHEY	
NRSDFLXA	NORTHSIDE	
NSBHFLMA	NEW SMYRNA BEACH	
NWBYFLMA	NEWBERRY	
OJUSFLTL	OJUS	
OKHLFLMA	OAK HILL	

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OLDSFLXA	OLDSMAR	
OLTWFLLN	OLD TOWN	
ORLDFLAP	ORLANDO	
ORLDFLCL	ORLANDO	
ORLDFLMA	ORLANDO	
ORLDFLPC	ORLANDO	
ORLDFLPH	ORLANDO	
ORLDFLSA	ORLANDO	
ORLEFLGV	ORLANDO	
ORPKFLMA	ORANGE PARK	
ORPKFLRW	ORANGE PARK	
OSPRFLXA	OSPREY	
OVIDFLCA	OVIEDO	
PACEFLPV	PACE	
PAHKFLMA	PAHOKEE	
PCBHFLNT	PANAMA CITY BEACH	
PKCYFLXA	POLK CITY	
PLCSFLMA	PALM COAST	
PLMTFLXA	PALMETTO	
PLSLFLXA	PALMA SOLA	
PLTKFLMA	PALATKA	
PMBHFLCS	CORAL SPRINGS	
PMBHFLDR	POMPANO BEACH	
PMBHFLED	POMPANO BEACH	
PMBHFLFE	POMPANO BEACH	
PMBHFLMA	COCONUT CREEK	
PMBHFLNP	POMPANO BEACH	
PMBHFLTA	TAMARAC	
PNCYFLCA	PANAMA CITY	
PNCYFLMA	PANAMA CITY	
PNLSFLXA	PINELLAS	
PNSCFLBL	PENSACOLA	
PNSCFLFP	PENSACOLA	
PNSCFLHC	PENSACOLA	
PNSCFLPB	PENSACOLA	
PNSCFLWA	PENSACOLA	
PNVDFLMA	PONTE VEDRA BEACH	
PRRNFLMA	MIAMI	
PRSHFLXA	PARRISH	
PRSNFLFD	PIERSON	
PSDNFLXA	PASADENA	
PTCYFLXA	PLANT CITY	
PTSLFLMA	PORT SAINT LUCIE	
PTSLFLSO	PORT ST LUCIE	
RSKNFLXA	RUSKIN	
SARKFLXA	ST ARMANDS KEY	
SBSTFLFE	FELLSMORE	
SBSTFLMA	SEBASTIAN	

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SEKYFLXA	SIESTA KEY	
SGBEFLXA	SOUTH GULF BEACH	
SGKYFLMA	SUGARLOAF KEY	
SKWYFLXA	SKYWAY	
SLSPFLXA	SULPHUR SPRINGS	
SMNLFLXA	SEMINOLE HEIGHTS	
SNFRFLMA	SANFORD	
SNSPFLXA	SEVEN SPRINGS	
SPBGFLXA	ST PETERSBURG	
SPBGFLXS	ST PETERSBURG	
SPRGFLXA	SPRINGS	
SRSTFLXA	SARASOTA	
SSDSFLXA	SOUTHSIDE (SARASOTA)	
STAGFLBS	SAINT AUGUSTINE	
STAGFLMA	SAINT AUGUSTINE	
STAGFLSH	SAINT AUGUSTINE	
STAGFLWG	SAINT AUGUSTINE	
STGRFLXA	ST GEORGE	
STRNFLMA	STUART	
SWTHFLXA	SWEETWATER CREEK	
TAMPFLXE	TAMPA	
TAMPFLXX	TAMPA	
TAMQFLRY	TAMPA	
THNTFLXA	THONOTOSASSA	
TMTRFLXA	TEMPLE TERRACE	
TRENFLMA	TRENTON	
TRSPFLXA	TARPON SPRINGS	
TTVLFLMA	TITUSVILLE	
UNVRFLXA	UNIVERSITY OF SO FLORIDA	
VENCFLXA	VENICE	
VENCFLXS	VENICE	
VRBHFLBE	VERO BEACH	
VRBHFLMA	VERO BEACH	
WELKFLMA	WELAKA	
WIMMFLXA	WIMAUMA	
WLCHFLXA	WESLEY CHAPEL	
WLCRFLXA	WALLCRAFT	
WNHNFLXC	WINTER HAVEN	
WPBHFLAN	WEST PALM BEACH	
WPBHFLGA	LAKE WORTH	
WPBHFLGR	PALM BEACH GARDENS	
WPBHFLHH	WEST PALM BEACH	
WPBHFLLE	LAKE WORTH	
WPBHFLRB	RIVERIA BEACH	
WPBHFLRP	ROYAL PALM BEACH	
WSSDFLXA	WESTSIDE (PART OF TAMPA)	
WWSPFLHI	BROOKSVILLE	
WWSPFLSH	SPRING HILL	



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YBCTFLXA	YBOR CITY	
YNTWFLMA	YANKEETOWN	
YULEFLMA	YULEE	
ZPHYFLXA	ZEPHYRHILLS	
Grand Total		

**(September 2003 Billing Data)**

<b>FL</b>	<b>1 Line</b>	
<b>FL</b>	<b>2 Lines</b>	
<b>FL</b>	<b>3 Lines</b>	
<b>FL</b>	<b>4 Lines</b>	
<b>FL</b>	<b>5 Lines</b>	
<b>FL</b>	<b>6 - 8 Lines</b>	
<b>FL</b>	<b>9 - 12 Lines</b>	
<b>FL</b>	<b>13 - 15 Lines</b>	
<b>FL</b>	<b>15 or more Lines</b>	
FL Total		100.00%