

030851-TP

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

1. Please provide the 11-digit COMMON LANGUAGE® Location Identifier (CLLI™) of each switch used to provide qualifying service¹ anywhere in the state of Florida that is owned by your company. If you lease, rent or otherwise obtain switching capacity on a switch that you do not own (other than from an incumbent Local Exchange Carrier), provide the same information regarding all such switches.

Response:

Comcast Phone of Florida, LLC ("Comcast Phone") objects to this Request to the extent that it seeks information outside of the possession or control of Comcast Phone. Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds as follows:

[BEGIN CONFIDENTIAL INFORMATION]



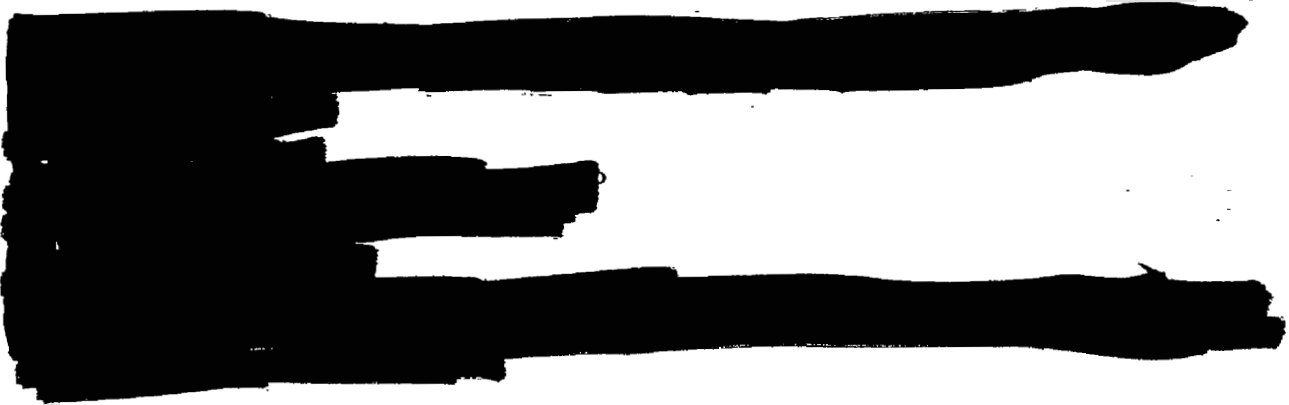
AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OFC _____
MMS _____
SEC 1
OTH _____

¹ A "qualifying service" is a telecommunications service that competes with a telecommunications service that has been traditionally the exclusive or primary domain of incumbent LECs, including, but not limited to, local exchange service, such as plain old telephone service, and access services, such as digital subscriber line services and high-capacity circuits. 47 C.F.R. § 51.5.

DOCUMENT NUMBER-DATE
11438 NOV 14 8
FPSC-COMMISSION CLERK

INTERROGATORIES OF BELL SOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC



[END CONFIDENTIAL INFORMATION]

INTERROGATORIES OF BELL SOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.



Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

2. For every switch identified in response to Question 1, provide the number of DS-0/voice grade equivalent access lines that switch is equipped to provide. If you lease, rent or otherwise obtain capacity on someone else's switch, provide the DS0/voice grade equivalent access lines associated with the capacity you have obtained.

Response:

Comcast Phone objects to this Request to the extent that it seeks information outside the possession or control of Comcast Phone (i.e., information about the number of DS-0/voice grade equivalent access lines that the switches included in the response to Request No. 1 are equipped to provide). Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds that the number of voice-grade equivalent DS0 lines served by Comcast Phone using the arrangement described in response to Request No. 1 is:

[BEGIN CONFIDENTIAL INFORMATION]  **[END CONFIDENTIAL INFORMATION]** 

INTERROGATORIES OF BELL SOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

3. For every switch identified in response to Question 1, provide the number of DS-0/voice grade equivalent access lines currently in use and state the date for which such information is provided.

Response:

Comcast Phone objects to this Request on the ground it is vague and ambiguous with respect to the phrase "in use." Comcast Phone further objects to this Request to the extent that it seeks information outside the possession or control of Comcast Phone (i.e., information about the number of DS-0/voice grade equivalent access lines in use by a variety of parties outside the control of Comcast). Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds that the number of voice-grade equivalent DS0 lines served by Comcast Phone using that arrangement is:

[BEGIN CONFIDENTIAL INFORMATION] [REDACTED] **[END CONFIDENTIAL INFORMATION]** [REDACTED]

INTERROGATORIES OF BELLSOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission
triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

4. State whether each switch identified in response to Question 1 serves residential customers.

Response:

Comcast Phone uses the arrangement described in response to Request No. 1 to serve residential customers in the State of Florida.

INTERROGATORIES OF BELLSOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

5. Does this switch serve customer locations with:

- a.* 1 line only?
- b.* 2 or fewer lines?
- c.* 3 or fewer lines?
- d.* 4 or fewer lines?
- e.* 5 or fewer lines?
- f.* 6 or fewer lines?
- g.* 7 or fewer lines?
- h.* 8 or fewer lines?
- i.* 9 or fewer lines?
- j.* 10 or fewer lines?

Response:

Comcast Phone objects to this request on the grounds that it is unduly burdensome. In particular, the request for information by number of lines is unduly burdensome because Comcast Phone does not maintain information in that format. In order to provide such information in that format, the company would be forced to undertake a special study which would be burdensome and outside the ordinary course of the company's business. Subject to those objections and without waiver thereof, please refer to the line numbers supplied in response to Request Nos. 2 and 3.

INTERROGATORIES OF BELLSOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

6. For each grouping of customer locations identified in Question 5 (locations with 1 line, locations with 2 or fewer lines, etc.), provide:
 - a. The individual customer locations. Initially, it will be sufficient to provide these locations by wire center service area. If that information is not readily available, then the information should be provided by actual customer address. To explain further, this question asks you to provide, initially by wire center service area, the number of customer locations you serve that have one line, two lines or fewer, three lines or fewer, etc. If you cannot provide the information by wire center service area, then provide this information by actual customer location, i.e. Customer A is located at 1234 Broadway, Miami, Florida, and has one line, and so forth.
 - b. The number of lines at each location that are used to provide voice service, and the number of lines that are used to provide data service, identified separately. If each line is used to provide both voice and data, so indicate.

If you know that the specific customer location is served by lines provided by another CLEC, or by an ILEC, provide the number of DS0/voice grade equivalent lines provided at each customer location by other CLECs or ILECs.

Response

Comcast Phone objects to this Request on the grounds that it is overbroad, unduly burdensome and oppressive. In particular, the request is unduly burdensome and oppressive because Comcast Phone does not maintain information by number of lines or by wire center. In order to provide the information in the requested format, Comcast Phone would be forced to undertake a special study which would be burdensome and outside the ordinary course of the company's business. Further, Comcast Phone objects to the request of information by "actual customer location," inasmuch as that request is unduly burdensome and neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORIES OF BELLSOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission
triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Subject to those objections and without waiver thereof, please refer to the line numbers supplied
in response to Request Nos. 2 and 3.

INTERROGATORIES OF BELL SOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

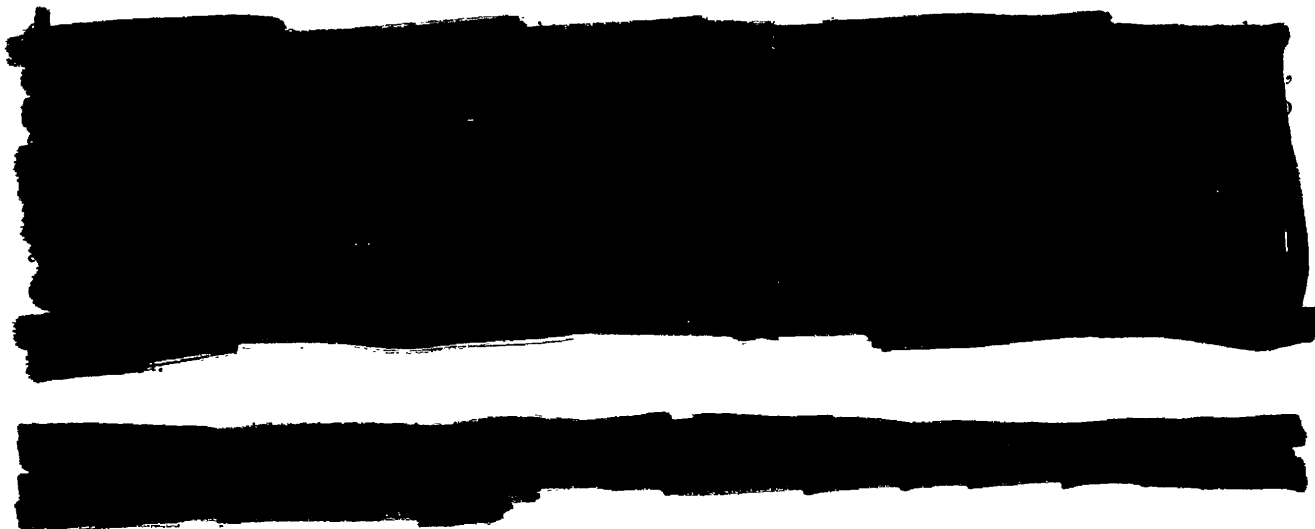
Respondent: David Sered, Director of Regulatory Affairs

7. Provide the street address (e.g., 123 Main Street), the city (e.g., Miami), and the state (e.g., FL) where every switch identified in response to Question 1 is located.

Response:

Comcast Comcast Phone objects to this Request to the extent that it seeks information outside of the possession or control of Comcast Phone. Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds as follows:

[BEGIN CONFIDENTIAL INFORMATION]



[END CONFIDENTIAL INFORMATION]

INTERROGATORIES OF BELL SOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

Respondent: David Sered, Director of Regulatory Affairs

8. Do you offer to provide or do you provide switching to other carriers for their use in serving customers? If yes, state: (a) the carriers to whom you provide switching; (b) the types of service, if known, that are provided by the carriers to whom you provide switching; (c) whether you will provide switching to any requesting carrier; (d) identify each wire center district (by eight digit CLLI code) in which wholesale switching is available.

Response

No. Comcast Phone does not offer switching to other carriers for their use in serving customers. Therefore, subparts (a) through (d) are inapplicable to Comcast Phone.

INTERROGATORIES OF BELLSOUTH TELECOMMUNICATIONS, INC.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission
triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos. Docket No. 030851-TP
DATE: November 7, 2003

CONFIDENTIAL EXHIBIT A

The number of voice-grade DS0 lines by which the company provides voice services to end users, as of the date of this response, is listed below by rate center:

[BEGIN CONFIDENTIAL INFORMATION]



[END CONFIDENTIAL INFORMATION]

[END CONFIDENTIAL INFORMATION]