

# ORIGINAL

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December 3, 2003

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 03 DEC -3 PM 3:36  
 COMMISSION  
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### VIA HAND DELIVERY

Blanco S. Bayo  
 Division of the Commission Clerk  
 And Administrative Services  
 Florida Public Service Commission  
 2540 Shumard Oak Boulevard  
 Tallahassee, FL 32399-0855

*Re: Response of Comcast Phone of Florida, LLC to the Data Request by the Florida Public Service Commission Regarding Implementation of Requirements Arising From FCC's Triennial Unbundled Network element Review - Local Circuit Switching for Mass Market Customers (Docket No. 030851-TP) and High-Capacity Loops and Transport (Docket No. 030852-TP)*

Dear Ms. Bayo:

In its November 12, 2003 Data Requests regarding Implementation of Requirements arising from the Federal Communication Commission's Triennial UNE Review ("Data Requests"), the Florida Public Service Commission ("the Commission") directed Florida ALECs to provide information relative to their switching facilities and the provision of dedicated transport and of high-capacity loops. Comcast Phone of Florida, LLC ("Comcast Phone" or the "Company") has reviewed the Data Requests, and has determined, as further described below, that it is either not the appropriate respondent to portions of the Commission's Data Requests and/or the remaining portions of the Commission's Data Requests are inapplicable to Comcast Phone.

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*1 file to each docket*

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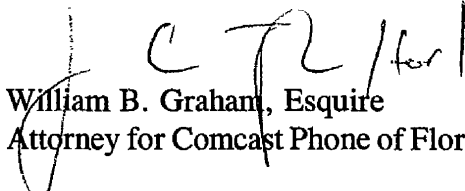
Comcast Phone does not purchase switching or transport on a stand-alone basis. Rather, Comcast Phone purchases an aggregate service from a third party, which includes, among other things, switching and transport. That arrangement is the result of a November 2002 merger, wherein the third party, following the merger, continued to provide to Comcast Phone the aggregate service described above (including switching, transport, local network connectivity, management and operational services). Comcast Phone uses this aggregate service in conjunction with its own network, for the provision of telecommunications services. As a result of that relationship, Comcast Phone does not have a business reason to gather detailed information relative to the switching or transport underlying the aggregate service that it purchases from the third party. Additionally, because Comcast Phone relies on this legacy relationship with the third party, Comcast Phone does not maintain collocation arrangements with BellSouth.

With respect to the provision of high-capacity loops, Comcast Phone provides service in the State of Florida at the DS0 level of service only. No Comcast Phone customers purchase a sufficient number of DS0s as to make a DS1 an economically viable substitute.

Accordingly, Comcast Phone believes, for the reasons described above, that it is either not the appropriate respondent to portions of the Commission's Data Requests and that the remaining portions of the Commission's Data Requests are inapplicable to Comcast Phone.

Comcast Phone appreciates your attention to this matter and will continue to cooperate with the Commission in this proceeding. If you have any questions with respect to this letter, please contact the undersigned at the address or telephone number above.

Sincerely,

  
William B. Graham, Esquire  
Attorney for Comcast Phone of Florida, LLC

WBG/ktc