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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

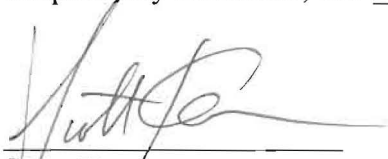
In re: Implementation of requirements arising from Federal Communications Commission's Triennial UNE review: Local Circuit Switching for Mass Market Customers.

DOCKET NO. 030851-TP

FDN COMMUNICATION'S NOTICE OF SERVING OBJECTIONS AND RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 8 - 11) AND STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 9)

Florida Digital Network, Inc., d/b/a FDN Communications ("FDN") hereby provides notice that it has served its objections and responses to Staff's Second Set of Interrogatories (Nos. 8-11), and Second Request for Production of Documents (No. 9) to the parties to this docket.

Respectfully submitted, this 29th day of December 2003.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising
from Federal Communications Commission's
Triennial UNE review: Local Circuit Switching
for Mass Market Customers.

DOCKET NO. 030851-TP

**FLORIDA DIGITAL NETWORK, INC.'S OBJECTIONS AND RESPONSES TO
STAFF'S SECOND SET OF INTERROGATORIES (NOS. 8 - 11) AND STAFF'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 9)**

Florida Digital Network, Inc., d/b/ FDN Communications ("FDN") pursuant to Rule 28.106-206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure and Order No. PSC-03-1055-PCO-TP, issued September 22, 2003, as subsequently amended, hereby serves its objections and responses to Staff's Second Set of Interrogatories and Second Set of Request for Production of Documents (No. 9).

FDN incorporates herein by reference the objections FDN served on December 15, 2003. Without waiving any of these objections and subject to the objections stated there and herein, FDN answers Staff's discovery as follows:

INTERROGATORIES

8. (a) For all switches that you have provisioned in the State of Florida, please identify from which switches you also have self-provisioned local loops to one or more end users.

FDN has not self-provisioned loops to end users. FDN uses ILEC-provisioned voice grade and DS-1 level loops in conjunction with self-provisioned switching. FDN does have a limited number of self-provisioned loops in use at each of its switching facilities for internal company use. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if

information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (b) For those switches identified in response to (a), please identify the capacity of the loops self-provisioned and the number of each loop type provisioned to end users.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (c) For those loops identified in response to (b), please state the terms, conditions, and rates under which your company is providing the loop in conjunction with the switching component.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (d) For those switches identified in response to (a), please identify the switch name and its current software release.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (e) For those switches identified in response to (a), are there any features being offered by the ILEC in the wire centers served by this switch that your switch is incapable of providing?

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (f) If the response to (e) is affirmative, please identify what features cannot be provided, what classes of customers use such features, and what actions would be necessary in order to provide these features.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (g) For those switches identified in response to (a), please identify the anticipated year of retirement.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (h) For those switches identified in response to (a), please describe any existing plans to upgrade the switch's capacity or to implement software upgrades.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (i) For those switches identified in response to (a), will you provide wholesale switching capacity to another CLEC?

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (j) If the response to (i) is affirmative, please identify the terms, conditions, and rates you would require of a wholesale customer, including contract terms and take or pay requirements, and state whether your company will ensure that the calling scopes and features that are offered to wholesalers will be the same that the ILEC offers.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (k) If the response to (i) is affirmative, please identify the operational support system interface capabilities, including version number and a copy of the methods and

procedures, that your company uses or will use when offering unbundled local switch capability to CLECs in the State of Florida.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (l) If the response to (i) is affirmative, do you currently provide wholesale switching capacity to another CLEC?

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (m) If the response to (l) is affirmative, please identify to what CLECs you currently provide wholesale switching and the switch used.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (n) If the response to (l) is affirmative, please state your company's mean time to repair and other response intervals for servicing existing switches.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (o) If the response to (i) is affirmative, please state your company's signaling capability and signaling redundancy that will be used in making available unbundled local switching to CLECs in the State of Florida.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (p) If the response to (i) is affirmative, please describe your company's methods and procedures to prevent or minimize service degradation, including but not limited to delay and/or echo return loss attenuation, to a CLEC that utilizes your company's unbundled local switching in Florida.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer.

- (q) If the response to (i) is affirmative, will your company also make available transport as a stand-alone service to CLECs within the State of Florida?

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (r) If the response to (i) is affirmative, will your company make transport available in conjunction with the provision of unbundled local switching capacity to CLEC?

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (s) What is the total available capacity on your company's network to provide transport?

FDN objects to this interrogatory to the extent it seeks irrelevant information, information not reasonably calculated to lead to the discovery of admissible evidence. The focus of this docket, per the delegation of the FCC, is mass market switching, as defined in the TRO, not the transport capacity of ALECs' networks.

Objection by Counsel.

- (t) If the response to (i) is affirmative, under what rates, terms, and conditions are you willing to provide transport in conjunction with the provision of unbundled local switching capacity to CLECs in Florida?

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (u) For those loops identified in response to (b), please identify, by wire center, the location of such facilities and whether those facilities:

- (1) Use fiber to the customer's premises;
- (2) Use coax to the customer's premises;
- (3) Use twisted copper pair to the customer's premises;
- (4) Use fixed wireless technology to the customer's premises.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

9. (a) For all switches or switching capacity that you have leased to provide service in the state of Florida, please identify from which switches you have self-provisioned local loops to one or more end users.

FDN has not self-provisioned loops to end users. FDN uses ILEC-provisioned voice grade and DS-1 level loops in conjunction with self-provisioned switching. FDN does have a limited number of self-provisioned loops in use at each of its switching facilities for internal company use. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (b) For those switches identified in response to (a), please identify the capacity of the loops self-provisioned and the number of each loop type provisioned to end users.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (c) For those loops identified in response to (b), please state the terms, conditions, and rates under which your company is providing the loop in conjunction with the switching component.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (d) For those switches identified in response to (a), please identify the switch name and its current software release.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (e) For those switches identified in response to (a), are there any features being offered by the ILEC in the wire centers served by this switch that your switch is incapable of providing?

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (f) If the response to (e) is affirmative, please identify what features cannot be provided, what classes of customers use such features, and what actions would be necessary in order to provide these features.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (g) For those switches identified in response to (a), please identify the anticipated year of retirement.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (h) For those switches identified in response to (a), please describe any existing plans to upgrade the switch's capacity or to implement software upgrades.

Not applicable. FDN does not self provision loops (for retail purposes) from FDN's self-provisioned switches, as requested in (a), above. Clarification is necessary if information is sought relative to self-provisioned switches that do not have self-provisioned loops.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

10. (a) Are you aware of any unaffiliated CLECs that either are willing to provide or currently are providing in Florida, wholesale unbundled local switching in combination with unbundled analog loops?

No.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (b) If the response to (a) is affirmative, please identify such companies of which you are aware, and identify in which LATAs and wire centers they offer this combination.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

- (c) If the response to (a) is affirmative, please explain whether or not you believe these entities qualify as wholesale providers, and the basis for your belief.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

11. Please identify in which Florida wire centers you actively market your services, and what services you market in each wire center.

FDN provides to its response to Staff's Interrogatory No. 11 subject to the Protective Order issued in this docket and pursuant to a Notice of Intent to Request Confidential Classification. See Appendix Int. 11.

REQUESTS FOR PRODUCTION

9. Referring to the company's response to Interrogatory No. 8(k), please provide a copy of the OSS methods and procedures documentation.

Not applicable.

Answer provided by: Matthew J. Blocha, Chief Technology Officer

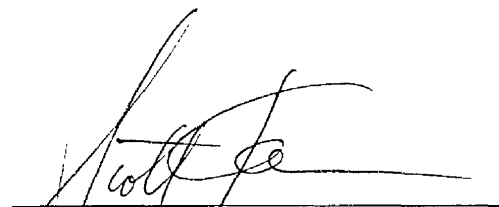


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sealed envelope.

- 4) The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record. FDN will submit a specific request for confidential classification as required.

Respectfully submitted this 29th day of December 2003.



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CERTIFICATE OF SERVICE
Docket 030851-TP

I hereby certify that a copy of the foregoing was sent by e-mail and regular mail to the persons listed below, other than those marked with an (*) who have been sent a copy via overnight mail, this 29th day of December, 2003.

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