

ORIGINAL

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December 30, 2003

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed please find a corrected page 3 of the Direct Testimony of BellSouth's witness Pamela A. Tipton. For ease of reference, we have enclosed both the corrected page 3 and a redline version of page 3 that shows the correction made. Also enclosed please find a public version of BellSouth's witness Pamela A. Tipton revised Exhibit PAT-5. The revised exhibit reflects the deletion of a CLEC that was previously identified as the seventh CLEC (out of 8) meeting the self-provisioning trigger in the Fort Lauderdale, FL Zone 1 market. The revised Exhibit PAT-5 now reflects a total of 7 CLECs that meet the self-provisioning trigger in the Fort Lauderdale, FL Zone 1 market.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

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FPSC-BUREAU OF RECORDS

Sincerely,

Nancy B. White
Nancy B. White (WA)

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Enclosure

cc: Parties of Record
Marshall M. Criser III
R. Douglas Lackey

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Nancy B. White (KA)

(+)signed Protective Agreement
(*) via Hand Delivery
(⊗) via FedEx

1 §51.319(d)(2)(iii)(A), which states that “a state commission shall find that a
2 requesting telecommunications carrier is not impaired without access to
3 local circuit switching on an unbundled basis in a particular market where
4 either the self-provisioning trigger ... or the competitive wholesale facilities
5 trigger ...is satisfied.” My testimony focuses on the self-provisioning
6 trigger. BellSouth is not at this time attempting to make a showing of no
7 impairment based on switching being wholesaled by other providers.

8
9 I also provide data identifying the actual deployment that exists in some of
10 those geographic markets where the FCC’s triggers are not met. This
11 data supports the conclusion of other BellSouth witnesses that, pursuant
12 to the FCC’s “potential deployment” analysis. CLECs are not impaired
13 without access to BellSouth’s unbundled local switching in certain markets
14 where the self-provisioning trigger is not met.

15
16 **ISSUE 4(a): In which markets are there three or more CLECs not affiliated**
17 **with each other or the ILEC, including intermodal providers of service**
18 **comparable in quality to that of the ILEC, serving mass market customers**
19 **with their own switches?**

20
21 Q. ARE CLECS USING THEIR OWN SWITCHES TO SERVE CUSTOMERS
22 IN FLORIDA?

23
24 A. Yes. CLECs have deployed more than 100 switches in Florida, at least 30
25 of which are serving over 100,000 “mass market” customers. The
26