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January 9, 2004

Ms. Blanca S. Bayo, Director
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. 030852-TP
Implementation of requirements arising from Federal Communications
Commission's triennial UNE Review: Location-Specific Review for DS1, DS3
and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber
Transport

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of the Joint Supplemental Direct
Testimony of Orville D. Fulp and John White on behalf of Verizon Florida Inc. in the
above matter. Service has been made as indicated on the Certificate of Service. If
there are any questions regarding this matter, please contact me at 813-483-1256.

Sincerely,

Richard A. Chapkis

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Enclosures

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CERTIFICATE OF SERVICE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Requirements Arising)
From Federal Communications Commission's) Docket No. 030852-TP
Triennial UNE Review: Location-Specific Review)
For DS1, DS3 and Dark Fiber Loops, and)
Route-Specific Review for DS1, DS3 and Dark)
Fiber Transport.)
_____)

JOINT SUPPLEMENTAL DIRECT TESTIMONY OF

ORVILLE D. FULP

AND

JOHN WHITE

ON BEHALF OF VERIZON FLORIDA INC.

PUBLIC VERSION

JANUARY 9, 2004

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1 **I. INTRODUCTION AND OVERVIEW**

2 **Q. PLEASE IDENTIFY THE MEMBERS OF THIS PANEL.**

3 A. The members of this panel are Orville D. Fulp and John White.

4

5 **Q. IS THIS THE SAME VERIZON PANEL THAT SUBMITTED TESTIMONY**
6 **ON DECEMBER 22, 2003?**

7 A. Yes.

8

9 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY.**

10 A. The purpose of the supplemental testimony is to show that, under the FCC's
11 objective triggers, Verizon is not required to provide unbundled access to dedicated
12 transport along certain routes and high capacity loops to certain customer locations.
13 Pursuant to Commissioner Davidson's December 19, 2003 letter, this testimony
14 relies on additional evidence provided by competitive carriers in response to the
15 Commission Staff's discovery requests to fulfill its purpose.

16

17 **II. DEDICATED TRANSPORT**

18 **Q. PLEASE GIVE A BRIEF OVERVIEW OF THE EVIDENCE USED TO**
19 **SHOW THAT CERTAIN DEDICATED TRANSPORT ROUTES IN**
20 **FLORIDA MEET ONE OR BOTH OF THE FCC'S TRIGGERS.**

21 A. Verizon has combined the CLECs' discovery responses, where appropriate, with the
22 information used in its initial testimony, which was drawn largely from public and
23 internal sources. In a number of cases, Verizon has also adjusted the information it
24 used in its initial testimony to reflect the CLECs' responses. This combined and
25 adjusted evidence is presented in Exhibits F.1 through F.4. Exhibit F.1 presents the

1 direct transport routes meeting the FCC's self-provisioning trigger for dark fiber;
2 Exhibit F.2 presents the direct transport routes meeting the self-provisioning trigger
3 for DS-3 capacity; Exhibit F.3 presents the direct transport routes meeting the
4 wholesale trigger for DS1s and DS3s; and Exhibit F.4 presents the direct transport
5 routes meeting the wholesale trigger for dark fiber. The proprietary versions of
6 Exhibits F.1 through F.4 identify the competitive carriers with operational, fiber-based
7 collocation arrangements in the Verizon wire centers. Competitive carriers' names
8 are removed from the public versions of these exhibits.

9
10 **Q. PLEASE DESCRIBE THE DIRECT TRANSPORT ROUTES MEETING THE**
11 **FCC'S TRIGGERS.**

12 A. When the CLECs' discovery responses are combined with Verizon's information,
13 there are (1) 25 direct transport routes (or pairs of Verizon wire centers) meeting the
14 FCC's self-provisioning trigger for dark fiber (Exhibit F.1); (2) 25 direct routes
15 meeting the FCC's self-provisioning trigger for DS3-level capacity (Exhibit F.2); (3)
16 67 direct routes meeting the FCC's wholesale trigger for DS1 and DS3 capacities
17 (Exhibit F.3); and (4) 67 direct routes meeting the FCC's wholesale trigger for dark
18 fiber (Exhibit F.4).

19
20 When combined with Verizon's internal information, the CLEC responses to the
21 Commission Staff's 2003 TRO discovery requests expand the number of dedicated
22 transport routes meeting one or both of the FCC's triggers.

23
24
25

1 **Q. DID ALL CLECS RESPOND FULLY AND APPROPRIATELY TO THE**
2 **STAFF'S DISCOVERY REQUESTS CONCERNING DEDICATED**
3 **TRANSPORT?**

4 A. No. First, not every competitive carrier identified by Verizon as having
5 operational, fiber-based collocation arrangements at a Verizon wire center has
6 responded to the Staff's transport discovery requests as of the date of this filing.
7 Those carriers include KMC, Xspedius, and Progress. Of the CLECs who did
8 respond to Staff's discovery, some have flatly refused to provide their confidential
9 responses to Verizon. Those carriers include Time Warner,¹ ITC^Deltacom,
10 TelCove and Z-Tel.

11
12 Second, Verizon has identified numerous problems and inadequacies with the
13 responses it received from many of the competitive carriers. For example, a few
14 competitive carriers claim to be unable to respond to discovery requests that are
15 essential to the application of the FCC's triggers, and still other carriers did not
16 respond fully and adequately to certain of the Staff's requests. Verizon will
17 continue its efforts to obtain complete, detailed information from all carriers in
18 Florida, including identification of additional direct routes. Verizon reserves the
19 right to combine any new data that it receives from these carriers through its efforts
20 with the information presented here and to submit further supplemental testimony
21 to the Commission.

22
23

¹ Time Warner did not provide Verizon its confidential response to Staff's TRO discovery request until the afternoon of Jan. 8, 2004, too late for inclusion in this supplemental filing

1 **Q. FOR THOSE COMPETITIVE CARRIERS THAT DID RESPOND TO THE**
2 **STAFF'S DISCOVERY REQUESTS ON DEDICATED TRANSPORT,**
3 **WHAT DO THE DATA SHOW?**

4 A. Although not all competitive carriers have responded to the Commission's data
5 requests as of this filing date and many did not respond fully or adequately, the
6 responses that we did receive help to provide a more complete assessment of the
7 dedicated transport routes in Florida that meet one or both of the FCC's triggers.
8 The competitive carriers' discovery responses confirm a key assumption in Verizon's
9 initial triggers case: that competitive carriers build OCn-level transport facilities
10 capable of channelization to DS1 or DS3 capacity services. In fact, the overwhelming
11 majority of CLECs responding to the Commission's discovery requests acknowledged
12 that, where they deployed their own transport facilities, they deployed fiber optic
13 cable and then (unless the fiber remained dark) attached OCn optronics (*e.g.*, OC48
14 multiplexers) and other electronic multiplexing equipment, to subdivide -- *i.e.*,
15 channelize -- the OCn system into the transport levels, such as DS1s and DS3s,
16 required by their customers.

17

18 **III. HIGH CAPACITY LOOPS**

19 **Q. WHAT SUPPLEMENTAL EVIDENCE DOES VERIZON HAVE FOR THE**
20 **ANALYSIS OF HIGH CAPACITY LOOP FACILITIES?**

21 A. In its *Triennial Review Order* ("TRO"), the FCC established that a state commission
22 must find that competing carriers are not impaired without access to Verizon's
23 unbundled dark fiber, DS1, and DS3 loop facilities (or hi-cap loops) at specific
24 customer locations if Verizon meets one of two objective "triggers." In its December
25 22, 2003 testimony, Verizon indicated that it was unable to identify customer

1 locations meeting the hi-cap loop triggers because information on CLEC loop
2 deployment was in the hands of the CLECs. Since that time, Verizon has reviewed
3 responses to the Commission’s hi-cap loop discovery questions, and can identify
4 customer locations in Florida that satisfy the hi-cap loop triggers.

5

6 **Q. PLEASE DESCRIBE THE FCC’S OBJECTIVE HI-CAP LOOP TRIGGERS.**

7 A. In the *Triennial Review Order*, the FCC found that requesting carriers are impaired on
8 a nationwide basis without access to unbundled dark fiber, DS1, and DS3 hi-cap loop
9 facilities serving the enterprise market. *Triennial Review Order* ¶¶ 311-14, 320-27.
10 The FCC recognized, however, that competing carriers often self-provision hi-cap
11 facilities or obtain them on a wholesale basis from carriers other than the ILEC. *Id.*
12 Consequently, the FCC authorized state commissions to determine the specific
13 customer locations that meet one of two objective triggers that show CLECs are
14 already providing non-ILEC hi-cap loop facilities, either to themselves (self-
15 provisioning trigger) or to other carriers (wholesale trigger). If a state commission
16 finds that either trigger is met for a specific loop capacity at a specific customer
17 location, the state commission must make a finding of non-impairment, and the ILEC
18 will no longer be required to unbundle that loop capacity to that customer location.
19 *Triennial Review Order* ¶ 328-329; *see also* 47 C.F.R. §51.319(a)(4)-(6). In other
20 words, when a customer location meets one of the FCC’s triggers, the state
21 commission conducting the customer location-specific review *must* find that the
22 FCC’s national finding of impairment has been overcome for the relevant loop
23 capacity at that location.

24

25 The first of the FCC triggers looks at whether competing carriers have *self-deployed*

1 or *self-provisioned* dark fiber or DS3 capacity loop facilities. Under the self-
2 provisioning trigger for dark fiber, the Commission must find no impairment if *two or*
3 *more* unaffiliated competing carriers have deployed to a particular customer location
4 their own dark fiber facilities. 47 C.F.R. § 51.319(a)(6)(i). Dark Fiber obtained under
5 a long-term indefeasible right of use is considered to be that carrier's own fiber for
6 purpose of applying the self-provisioning trigger. *Id.* ; *see also Triennial Review*
7 *Order* ¶ 333 n. 981. Under the self-provisioning trigger for DS3 loop facilities, the
8 Department must find no impairment if *two or more* unaffiliated competing carriers
9 have (i) deployed to a particular customer location their own dark fiber facilities and
10 are serving customers via those facilities at that location, or (ii) deployed DS3
11 facilities by attaching its own optronics to activate dark fiber facilities obtained under
12 a long-term indefeasible right of use and is serving customers via those facilities at
13 that location. *Triennial Review Order* ¶¶ 332-334; 47 C.F.R. § 51.319(a)(5)(i)(A).

14
15
16 The second FCC trigger looks at whether DS1 or DS3 loop facilities are available
17 from other carriers on a *wholesale* basis. Under this test, competing carriers are not
18 impaired without access to Verizon's DS1 or DS3 facilities if there are *two* or more
19 competing providers (including intermodal providers of service comparable in quality
20 to the ILEC) not affiliated with each other or the ILEC each of which (i) has deployed
21 its own DS1 or DS3 facilities; (ii) offers a DS1 or DS3 loop over its own facilities on
22 a widely available wholesale basis to other carriers desiring to serve customers at that
23 location; and (iii) has access to the entire customer location (including each individual
24 unit within that location). 47 C.F.R. § 51.319(a)(4)(ii), 47 C.F.R. §
25 51.319(a)(5)(i)(B). Dark fiber obtained on an unbundled, leased, or purchased basis

1 from another carrier counts as the buying carrier’s own DS1 or DS3 loop facility if
2 that carrier attaches its own electronics and offers the activated fiber at wholesale. *Id.*

3

4 **Q. WHAT IS A CUSTOMER LOCATION?**

5 A. The FCC distinguishes between “customer locations” and individual units within that
6 location. *See* 47 C.F.R. §§ 51.319(a)(4)(ii), (5)(i)(B). This distinction indicates that a
7 customer location is a building, not an individual unit or suite in a multi-unit building.
8 Based on their discovery responses, the CLECs in Florida agree. The Commission’s
9 discovery specifically asked the CLECs to identify the “customer locations” to which
10 they have deployed loop facilities, and in response, the CLECs provided the addresses
11 of specific buildings.

12

13 **Q. THE FCC’S TWO TRIGGERS APPLY TO DIFFERENT “CAPACITIES”**
14 **OF LOOPS. WHAT DETERMINES THE CAPACITY AT WHICH FIBER**
15 **LOOP FACILITIES OPERATE?**

16 A. The capacity of a fiber optic loop is almost exclusively based on the equipment that a
17 carrier attaches to activate or “light” the fiber. *See Triennial Review Order* ¶311. As
18 the FCC found in its *Triennial Review Order*, carriers that self-deploy fiber
19 predominantly do so at the OCn level. *Id.* ¶ 298. Indeed, the underlying capacity of a
20 strand of dark fiber is comparable in total capacity to an OCn loop, which can operate
21 at a wide range of capacities. *See id.* ¶ 311. Many CLECs that serve customers over
22 their own DS1 loops have previously deployed an OCn level facility that they are
23 using to serve other customers at lower loop capacity levels. *Id.* n. 859. Fiber optic
24 cable is also “channelized” (*i.e.*, larger capacity facilities are subdivided into smaller
25 capacity facilities) by attaching the appropriate electronics at both ends of the fiber

1 cable to provide these various capacities. For example, lower capacity DS1 and DS3
2 facilities are channelized simultaneously within the larger capacity OC12 or OC48
3 facility. The electronic equipment used to activate these various levels of capacity is
4 widely available.

5

6 **Q. WHAT DOES IT MEAN TO OPERATE A FIBER OPTIC LOOP FACILITY**
7 **AT OCN, DS1, OR DS3 LEVELS OF CAPACITY?**

8 A. As with transport, OCn loops refer to the technical distinction (*i.e.*, Optical Carrier or
9 “OC”) and the capacity (*i.e.*, “n”) of fiber optic cable. For example, an optical carrier-
10 level 3 — or OC3, capacity circuit contains the equivalent of up to three DS3 circuits
11 (an OC3 is approximately 155 Mbps, while three DS3s are 135 Mbps), but terminates
12 on a different type of electronic interface.

13

14 DS1 and DS3 loops likewise refer to the technical distinction (*i.e.*, Digital Signal or
15 “DS”) and capacity. The elemental speed is a DS0, which is a voice grade line with a
16 bandwidth of 64 Kbps. A DS1 capacity circuit contains the equivalent of 24 voice-
17 grade or DS0 channels. A DS3 capacity circuit contains the equivalent of 28 DS1
18 channels or 672 DS0 channels.

19

20 **Q. THE FCC’S LOOP TRIGGERS ARE SEPARATELY APPLIED TO DARK**
21 **FIBER FACILITIES. WHAT IS DARK FIBER?**

22 A. Dark fiber is the unused fiber within an existing fiber optic cable that has not yet been
23 activated through optronics to render it capable of carrying communications services.
24 *Triennial Review Order* ¶ 311. Dark fiber has virtually unlimited capacity, and it is
25 the electronics that define the capacity. *Id.* n. 909.

1 **Q. DID ALL OF THE CLECS PROVIDE THE INFORMATION REQUESTED**
2 **IN THE COMMISSION'S HI-CAP LOOP DISCOVERY REQUESTS?**

3 A. No, not all the CLECs served with the Commission Staff's 2003 TRO data request
4 provided the loop information requested. Furthermore, many of the CLECs who did
5 respond provided incomplete or inadequate responses. Confidential copies of the
6 CLEC responses that Verizon was able to obtain as of January 7, 2004 are included as
7 Exhibit G.

8
9 **Q. PLEASE DESCRIBE VERIZON'S EVIDENCE OF CUSTOMER**
10 **LOCATIONS IN FLORIDA THAT MEET THE FCC'S HI-CAP LOOP**
11 **TRIGGERS.**

12 A. Verizon presents evidence that 12 customer locations meet one or both of the FCC's
13 triggers. There are 4 customer locations that meet the DS1 wholesale trigger. With
14 respect to DS3 loops, 5 customer location meets the self-provisioning trigger, and 4
15 meet the wholesale trigger. Finally, there are 12 customer locations meeting the dark
16 fiber self-provisioning trigger. Exhibit F.5 identifies each customer location meeting
17 the triggers. The proprietary version of this attachment identifies the CLECs with
18 loop facilities at each customer location. CLEC names are removed from the public
19 version of Exhibit F.5.

20
21 **Q. DOES VERIZON'S TRIGGER ANALYSIS COVER THE ENTIRE STATE**
22 **OF FLORIDA?**

23 A. No. Verizon limited its analysis only to its service territory, and excluded those cities
24 in which it does not serve any customers.

25

1 **Q. CAN ANY FIBER LOOP FACILITY DEPLOYED BY A CLEC BE USED**
2 **TO PROVIDE A DS1 OR DS3 LOOP?**

3 A. Yes. In identifying the customer locations meeting the FCC’s triggers, Verizon made
4 the reasonable assumption that when competing carriers deploy fiber and attach OCn
5 electronics (*e.g.*, OC48 multiplexers), the carriers then subdivide (*i.e.*, channelize) the
6 OCn system into the lower transport levels required by their customers, including
7 DS3s and DS1s. This is consistent with the FCC’s finding (discussed above)

8
9 While fiber loop facilities are capable of operating at various levels of capacity, the
10 capacity of the fiber is almost entirely a function of the electronics that a carrier
11 attaches, not something inherent in the fiber itself. Once the fiber is deployed, it is
12 operated at a DS1, DS3, OC48 or higher level — or at all of these levels
13 simultaneously — simply by changing the electronics. The electronics used to
14 channelize the OCn system to DS1 and DS3 transport levels are widely available.

15
16 Verizon’s assumption that competing carriers who deploy fiber optics generally build
17 OCn level transport facilities, capable of channelization to DS1 or DS3, is consistent
18 with standard industry practice. Few if any carriers deploy fiber loop facilities to
19 accommodate *only* a DS1 or *only* a DS3. To the contrary, as the FCC found in the
20 *Triennial Review Order*, carriers deploying fiber predominantly do so at the OCn
21 level. *Triennial Review Order* ¶ 289. These OCn facilities are then subdivided or
22 channelized to a DS1 or DS3 level because these are the levels at which service is
23 typically requested by end user customers that use hi-cap facilities.

24
25 The assumptions underlying Verizon’s self-deployment trigger case are entirely

1 consistent with the way fiber loop facilities commonly are constructed and operated.
2 The Commission therefore should find that CLECs who have deployed fiber optic
3 loop facilities have the ability to provision DS1 and DS3 circuits — unless a carrier
4 shows, for a particular customer location, that it cannot deploy DS1 or DS3 circuits at
5 that location.

6

7 **Q. DO THESE FIBER LOOP FACILITIES ALSO CONTAIN DARK FIBER?**

8 A. Absent evidence to the contrary, it reasonably can be assumed that all self-provisioned
9 fiber loop facilities have dark fiber. Since dark fiber is simply fiber optic cable “that
10 has not been activated through connections to optronics that light it, and thereby
11 render it capable of carrying communications,” (*Triennial Review Order* ¶ 311), all
12 fiber loop facilities, regardless of the capacities at which they now operate, once
13 consisted entirely of dark fiber. Put differently, evidence of “lit” fiber is also evidence
14 that a carrier has self-provisioned dark fiber.

15

16 Additionally, as a matter of standard industry network engineering design and sound
17 economics, the vast majority of self-provisioned fiber loop facilities will have spare
18 dark fibers. As the FCC recognized, dark fiber exists in a carrier’s network as unused
19 fiber available because that carrier has deployed fiber in the first instance for the
20 express purpose of lighting certain strands of it to serve a particular customer location.

21 *Triennial Review Order* ¶ 312. The FCC explained,

22 When a fiber build decision is made, carriers take advantage
23 of the fact that they are already incurring substantial fixed
24 costs to obtain the rights-of-way, dig up streets, and trench
25 cable, to lay more fiber than they immediately need. Once

1 the significant fiber construction cost is incurred, the record
2 reflects that it is relatively easy and inexpensive to install
3 fiber strands in excess of current demand at that time to
4 maximize the use of conduit and avoid the need to incur
5 duplicate costs to retrench the same location in the future if
6 demand for additional fiber facilities occurs.

7 *Id.*

8

9 Thus, fiber facilities are always installed with extra fiber to meet projected demand
10 growth. Furthermore, fiber cables are commonly manufactured and deployed in
11 increments of 12 fiber strands (i.e., 12, 24, 48, etc., fibers per cable), which means that
12 there are likely to be additional unused fibers available to fill up the standard cable
13 size the carrier deployed. Verizon therefore assumed (and the Commission should
14 find) that CLECs who have deployed fiber optic loop facilities also have dark fiber
15 deployed at that location— unless a carrier shows, for a particular customer location,
16 that it does not have any dark fiber.

17

18 **Q. HOW DID VERIZON IDENTIFY CARRIERS OFFERING LOOP**
19 **FACILITIES ON A WHOLESALE BASIS, AND THE CAPACITIES AT**
20 **WHICH THOSE FACILITIES ARE OFFERED?**

21 A. Verizon primarily relied on carriers to self-identify themselves as wholesale providers
22 in response to the Commission Staff's TRO loop discovery requests. ** ** and
23 ** ** identified themselves as wholesale providers.

24 Verizon also found evidence of CLEC wholesale providers from public sources. As
25 with its transport evidence, Verizon identified carriers that hold themselves out as

1 wholesale providers on their websites. For example:

- 2 • FPL Fibernet provides “wholesale fiber optic service with bandwidth
3 capacity from DS-3 to OC-192 for long distance companies, CLECs,
4 BLECs, ISPs, ASPs and other communications related businesses
5 within the major metropolitan areas of Florida.”²
- 6 • MCI offers DS-1 and DS-3’s at wholesale.³
- 7 • Progress provides “wholesale fiber bandwidth to long distance,
8 international and wireless carriers, Internet service providers (ISPs),
9 competitive local exchange carriers (CLECs), and other strategic
10 customers through its extensive fiber-optic network in the Southeast...”⁴
- 11 • XO offers “Wholesale Dial Up,” which allows CLECs “rapidly expand
12 [their] nationwide dial capacity and increase [their] coverage area,
13 without building or managing [their] own *nationwide* dial network.”⁵

14 If a carrier publicly holds itself out as a wholesale provider of loop facilities or
15 telecommunications services generally, Verizon identified that carrier as a wholesale
16 provider.

17
18 Finally, Verizon assumes that a carrier that has deployed fiber loop facilities and is
19 willing to provide those facilities to other carriers is providing (or is willing to
20 provide) various levels of capacity at wholesale, including dark fiber, DS1, and DS3.

² www.fplfibernet.com (See Joint Direct Testimony of Fulp/White, Exhibit E 2)

³ www.mci.com/telecom_wholesale/index.jsp,
http://global.mci.com/publications/service_guide/products/, and
http://global.mci.com/publications/service_guide/products/products_currently_available/ (included as
Exhibit F.8).

⁴ www.progresstelecom.com/5_389.htm (Attached as Exhibit F 6)

⁵ http://www.xo.com/products/carrier/wholesale_dial/index.html
(emphasis added) (Attached as Exhibit F.7)

1 Therefore, unless there is specific evidence that a carrier refuses to sell other carriers
2 specific capacities and dark fiber on a particular transport route, the Commission
3 should find that a wholesale provider will sell DS1 and DS3 transport over its fiber
4 facilities, as well as dark fiber.

5

6 Based on the discovery responses and carrier websites, Verizon has identified **
7 ** and ** ** as counting towards the competitive wholesale trigger in at least one
8 building. If these carriers wish to attempt to show that a specific location is not
9 available at wholesale, the burden is now properly put on them to make such a
10 demonstration. Absent such particularized, location-specific evidence, however, the
11 Commission should rely on Verizon's evidence of a carrier's general willingness to
12 offer its loop facilities on a wholesale basis and treat all such carriers' loop facilities as
13 available for leasing at wholesale.

14

15 **Q. HOW DID VERIZON IDENTIFY WHETHER CLECS HAVE ACCESS TO**
16 **AN ENTIRE CUSTOMER LOCATION?**

17 A. The Commission's hi-cap loop discovery requests include a column entitled
18 "Accessible Y/N". Verizon assumes that this column is asking CLECs whether they
19 have access to the entire customer location. Moreover, in its responses to the
20 Commission's discovery requests, ** ** included a column entitled "Can Serve
21 All At Location." Where CLECs did not provide such information, Verizon
22 assumed that they do have access to the entire location. It is reasonable to assume that
23 a carrier with fiber optic facilities into a large commercial building has access to the
24 entire building.

25

1 **Q. HOW DID VERIZON IDENTIFY WHETHER CLECS SERVE END-USER**
2 **CUSTOMERS OVER DS3 FACILITIES THEY HAVE DEPLOYED?**

3 A. The Commission's hi-cap loop discovery specifically asked the CLECs to indicate
4 whether they could "serve all at location." Verizon primarily relied upon CLEC
5 responses to this question.

6

7 **Q. DID VERIZON EXCLUDE ANY OF THE CUSTOMER LOCATIONS**
8 **IDENTIFIED BY CLECS IN RESPONSE TO DISCOVERY FROM ITS**
9 **TRIGGER ANALYSIS?**

10 A. Verizon also assumed that CLECs are not serving customers in buildings that house
11 Verizon central offices and excluded them from its trigger analysis.

12

13 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT**
14 **TESTIMONY?**

15

16 A. Yes.

17

18

19

20

21

22

23

24

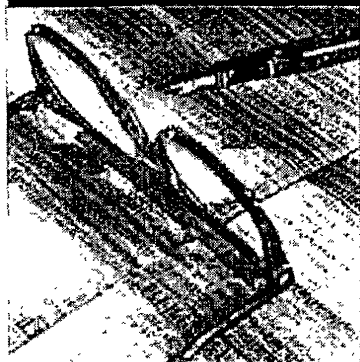
25

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BAYUFLXA	BAYOU	CLWRFLXA	CLEARWATER				1			1
		CNSDFLXA	COUNTRYSIDE				1			1
		PNLSFLXA	PINELLAS				1			1
		SPBGFLXA	ST PETERSBURG MAIN				1			1
		SRSTFLXA	SARASOTA MAIN				1			1
BHPKFLXA	BEACH PARK	CLWRFLXA	CLEARWATER				1			1
		FHSDFLXA	FEATHERSOUND			1				1
		SPBGFLXA	ST PETERSBURG MAIN				1			1
		SRSTFLXA	SARASOTA MAIN	1		1				
		SWTHFLXA	SWEETWATER	1	1	1	1	1		
		TAMPFLXA	TAMPA TANDEM	1	1	1	1	1		
		TAMPFLXE	TAMPA EAST			1	1			1
		TAMPFLXX	TAMPA MAIN	1	1	1	1	1		
		WSSDFLXA	TAMPA WESTSIDE	1	1	1	1	1		
		YBCTFLXA	YBOR				1	1		
		CLWRFLXA	CLEARWATER	CNSDFLXA	COUNTRYSIDE				1	
FHSDFLXA	FEATHERSOUND									1
PNLSFLXA	PINELLAS						1			1
SPBGFLXA	ST PETERSBURG MAIN				1		1			1
SRSTFLXA	SARASOTA MAIN						1			1
SWTHFLXA	SWEETWATER				1		1			1
TAMPFLXA	TAMPA TANDEM						1			1
TAMPFLXE	TAMPA EAST				1		1			1
WNHNLX	WINTER HAVEN				1		1			
WSSDFLXA	TAMPA WESTSIDE						1			1
CNSDFLXA	COUNTRYSIDE			PNLSFLXA	PINELLAS				1	
		SPBGFLXA	ST PETERSBURG MAIN				1			1
		SRSTFLXA	SARASOTA MAIN				1			1
		FHSDFLXA	FEATHERSOUND				1			1
FHSDFLXA	FEATHERSOUND	SPBGFLXA	ST PETERSBURG MAIN						1	1
		SWTHFLXA	SWEETWATER			1				1
		TAMPFLXA	TAMPA TANDEM				1			1
		TAMPFLXE	TAMPA EAST			1				1
HYPKFLXA	HYDE PARK	WSSDFLXA	TAMPA WESTSIDE				1			1
		TAMPFLXA	TAMPA TANDEM						1	
		TAMPFLXE	TAMPA EAST				1			1
		TAMPFLXX	TAMPA MAIN				1			1
		WSSDFLXA	TAMPA WESTSIDE				1			1
PNLSFLXA	PINELLAS	YBCTFLXA	YBOR				1			1
		SPBGFLXA	ST PETERSBURG MAIN				1			1
SRSTFLXA	SARASOTA MAIN	SRSTFLXA	SARASOTA MAIN				1			1
		SPBGFLXA	ST PETERSBURG MAIN				1			1
SPBGFLXA	ST PETERSBURG MAIN	SRSTFLXA	SARASOTA MAIN				1			1
		SWTHFLXA	SWEETWATER		1		1			1
		TAMPFLXA	TAMPA TANDEM				1			1
		TAMPFLXE	TAMPA EAST		1		1			1
		WNHNLX	WINTER HAVEN		1		1			
		WSSDFLXA	TAMPA WESTSIDE				1			1
SRSTFLXA	SARASOTA MAIN	SWTHFLXA	SWEETWATER	1			1			
		TAMPFLXA	TAMPA TANDEM	1			1			
		TAMPFLXX	TAMPA MAIN	1			1			
		WSSDFLXA	TAMPA WESTSIDE	1			1			
SWTHFLXA	SWEETWATER	TAMPFLXA	TAMPA TANDEM	1	1	1	1	1	1	
		TAMPFLXE	TAMPA EAST			1	1	1	1	

LATA 952																				
Count				CLECNm																
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name																	
		TAMPFLXX	TAMPA MAIN			1		1	1			1								
		WNHNFLXC	WINTER HAVEN					1	1											
		WSSDFLXA	TAMPA WESTSIDE			1		1	1			1		1						
		YBCTFLXA	YBOR					1	1											
TAMPFLXA	TAMPA TANDEM	TAMPFLXE	TAMPA EAST			1		1	1			1		1						
		TAMPFLXX	TAMPA MAIN			1		1	1			1		1						
		WSSDFLXA	TAMPA WESTSIDE			1		1	1			1		1		1				
		YBCTFLXA	YBOR			1		1	1			1		1						
TAMPFLXE	TAMPA EAST	TAMPFLXX	TAMPA MAIN					1	1					1						
		WNHNFLXC	WINTER HAVEN					1	1											
		WSSDFLXA	TAMPA WESTSIDE						1	1				1		1				
		YBCTFLXA	YBOR			1			1	1				1						
TAMPFLXX	TAMPA MAIN	WSSDFLXA	TAMPA WESTSIDE			1		1	1			1		1						
		YBCTFLXA	YBOR						1	1				1						
WSSDFLXA	TAMPA WESTSIDE	YBCTFLXA	YBOR						1	1				1						

LATA 952											
Count											
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	CLEC Nm							
BAYUFLXA	BAYOU	CLWRFLXA	CLEARWATER					1		1	
		CNSDFLXA	COUNTRYSIDE					1		1	
		PNLSFLXA	PINELLAS					1		1	
		SPBGFLXA	ST PETERSBURG MAIN					1		1	
		SRSTFLXA	SARASOTA MAIN					1		1	
BHPKFLXA	BEACH PARK	CLWRFLXA	CLEARWATER					1		1	
		FHSDFLXA	FEATHERSOUND				1			1	
		SPBGFLXA	ST PETERSBURG MAIN					1		1	
		SRSTFLXA	SARASOTA MAIN					1		1	
		SWTHFLXA	SWEETWATER	1	1	1		1		1	
		TAMPFLXA	TAMPA TANDEM	1	1	1		1		1	
		TAMPFLXE	TAMPA EAST				1	1		1	
		TAMPFLXX	TAMPA MAIN	1	1	1		1		1	
		WSSDFLXA	TAMPA WESTSIDE	1	1	1		1		1	
		YBCTFLXA	YBOR					1	1		
CLWRFLXA	CLEARWATER	CNSDFLXA	COUNTRYSIDE					1		1	
		FHSDFLXA	FEATHERSOUND						1	1	
		PNLSFLXA	PINELLAS					1		1	
		SPBGFLXA	ST PETERSBURG MAIN			1	1			1	1
		SRSTFLXA	SARASOTA MAIN					1		1	
		SWTHFLXA	SWEETWATER	1	1			1		1	
		TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST			1	1			1	
		WNHNFLXC	WINTER HAVEN			1	1				
		WSSDFLXA	TAMPA WESTSIDE					1		1	
CNSDFLXA	COUNTRYSIDE	PNLSFLXA	PINELLAS					1		1	
		SPBGFLXA	ST PETERSBURG MAIN					1		1	
		SRSTFLXA	SARASOTA MAIN					1		1	
FHSDFLXA	FEATHERSOUND	SPBGFLXA	ST PETERSBURG MAIN						1	1	
		SWTHFLXA	SWEETWATER			1			1	1	
		TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST			1			1	1	
WSSDFLXA	TAMPA WESTSIDE	TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST					1		1	
		TAMPFLXX	TAMPA MAIN					1		1	
		WSSDFLXA	TAMPA WESTSIDE					1		1	
HYPKFLXA	HYDE PARK	TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST					1		1	
		TAMPFLXX	TAMPA MAIN					1		1	
		WSSDFLXA	TAMPA WESTSIDE					1		1	
YBCTFLXA	YBOR	TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST					1		1	
PNLSFLXA	PINELLAS	SPBGFLXA	ST PETERSBURG MAIN					1		1	
		SRSTFLXA	SARASOTA MAIN					1		1	
SPBGFLXA	ST PETERSBURG MAIN	SRSTFLXA	SARASOTA MAIN					1		1	
		SWTHFLXA	SWEETWATER			1	1			1	
		TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST			1	1			1	
		WNHNFLXC	WINTER HAVEN			1	1				
WSSDFLXA	TAMPA WESTSIDE	TAMPFLXA	TAMPA TANDEM					1		1	
		TAMPFLXE	TAMPA EAST					1		1	
		TAMPFLXX	TAMPA MAIN					1		1	
		WSSDFLXA	TAMPA WESTSIDE					1		1	
SRSTFLXA	SARASOTA MAIN	SWTHFLXA	SWEETWATER			1	1				
		TAMPFLXA	TAMPA TANDEM			1	1				
		TAMPFLXX	TAMPA MAIN					1		1	
		WSSDFLXA	TAMPA WESTSIDE			1	1				
SWTHFLXA	SWEETWATER	TAMPFLXA	TAMPA TANDEM			1	1	1		1	
		TAMPFLXE	TAMPA EAST			1	1	1	1		1

LATA 952																				
Count				CLECNm																
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name																	
		TAMPFLXX	TAMPA MAIN		1		1	1		1										
		WNHNLXC	WINTER HAVEN			1		1												
		WSSDFLXA	TAMPA WESTSIDE		1		1	1		1				1						
		YBCTFLXA	YBOR				1	1												
TAMPFLXA	TAMPA TANDEM	TAMPFLXE	TAMPA EAST		1		1	1					1	1						
		TAMPFLXX	TAMPA MAIN		1		1	1					1	1						
		WSSDFLXA	TAMPA WESTSIDE		1		1	1					1	1	1					
		YBCTFLXA	YBOR		1		1	1					1							
TAMPFLXE	TAMPA EAST	TAMPFLXX	TAMPA MAIN				1	1						1						
		WNHNLXC	WINTER HAVEN				1	1												
		WSSDFLXA	TAMPA WESTSIDE				1	1					1	1						
		YBCTFLXA	YBOR		1									1						
TAMPFLXX	TAMPA MAIN	WSSDFLXA	TAMPA WESTSIDE		1		1	1					1	1						
		YBCTFLXA	YBOR				1	1						1						
WSSDFLXA	TAMPA WESTSIDE	YBCTFLXA	YBOR				1	1						1						


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About Progress Telecom

PROGRESS TELECOM AND EPIK COMMUNICATIONS TO MERGE OPERATIONS

The New Progress Telecom Will Provide Extended Reach and an Expanded Product Set to Customers

ST. PETERSBURG, FL - 05-Nov-03 -

Progress Telecom and EPIK Communications announced today that the two companies have entered into a definitive agreement to merge their operations to form a single company focused on delivering wholesale broadband solutions. With the combination of these successful and complementary providers, the new Progress Telecom will become the largest wholesale broadband provider in the Southeast. <p>

Customers will benefit from an expanded network, enhanced product portfolio and proven track record of best-in-class service and reliability. The merged company will be jointly owned by Progress Energy [NYSE: PGN], the parent company of Progress Telecom, and Odyssey Telecorp, parent company of EPIK.

Ron Mudry, who has been the CEO of Progress Telecom since its founding five years ago this month, will become the CEO of the merged company and will lead a management team that is a mixture of key personnel from both Progress Telecom and EPIK. Progress Energy will own 55 percent of the new company, and Odyssey will own 45 percent. The board of directors will be comprised of members from Progress Energy and Odyssey Telecorp. Leveraging its depth of telecom management and transition experience, Odyssey Telecorp will oversee the operations of the new Progress Telecom and lead the integration efforts.

"The new Progress Telecom will focus on leveraging its combination of deep metro presence, second- and third-tier reach and international gateways to provide wholesale broadband solutions throughout the Southeast and beyond," said Mudry. "The new company's broad product line and proven ability to deliver fast, flexible and reliable solutions will enable it to provide unmatched customer service and value."

The new Progress Telecom will be based in St. Petersburg, FL. It will continue to provide wholesale fiber bandwidth to long distance, international and wireless carriers. Internet service providers (ISPs), competitive local exchange carriers (CLECs), and other strategic customers through its extensive fiber-optic network in the Southeast and international gateways.

"Today, the competitive landscape demands more than just a broad footprint. You need to have the right products and services," said Sean Doherty, chairman and CEO of Odyssey Telecorp. "The combination of these two companies gives us all of this and more. The new Progress Telecom will be second only to BellSouth in the southeast U.S. and, arguably, the carrier of choice in that market."

"The new Progress Telecom positions us well for the inevitable consolidation of telecom networks in the Southeast," said Don Davis, executive vice president - Rail & Telecom. Progress Energy. "This merger will create a stronger, more competitive and, ultimately, more valuable telecommunications company - which is the key objective for Progress Energy, as well as being positive for Progress Telecom and its customers."

About the new Progress Telecom

The new Progress Telecom combines the assets of Progress Telecom and EPIK Communications. The new company is one of the largest leading regional providers of broadband services in the eastern United States. The combined fiber network offers fast local loop, metro ring access with dense wave division multiplexing (DWDM) technology and a 10 gigabit, OC-192 IP backbone. Progress Telecom's robust long-haul and metro fiber transport from New York to Miami allows customers to gain access to international gateways and first, second, and third-tier markets. The company's industry-leading network provides strategic POP locations

in the eastern United States, including major international cable landing presence in South Florida. Broadband services offered include private line, wavelength, Ethernet, and Internet protocol (IP), as well as other customized services and solutions. The new Progress Telecom is jointly owned by Progress Energy (NYSE: PGN), a Fortune 250 diversified energy company headquartered in Raleigh, NC, and Odyssey Telecorp, a telecommunications investment firm based in Palo Alto, CA. For more information about the new Progress Telecom, visit the company's Web site at <http://www.progresstelecom.com/>

This news release contains "forward-looking statements" within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended. These forward-looking statements include the Company's present expectations or beliefs concerning future events. The Company cautions that such statements are necessarily based on certain assumptions, which are subject to risks and uncertainties that could cause actual results to materially differ from those contained in these forward looking statements. Important factors that could cause such differences include but are not limited to, the Company's ability to complete systems and expand and enhance its telecommunications network within currently estimated time frames and budgets; the ability to compete effectively in a rapidly evolving capital constrained, volatile, and price competitive marketplace and to respond to customer demands and industry changes; the ability to achieve revenues from products and services in the telecommunications business that are in the early stages of development or operation; credit risks associated with contractual obligations from telecommunication customers; the ability to manage growth; changes in business strategy; legislative or regulatory changes; technological changes; volatility of fuel prices; changing general economic conditions (particularly in the State of Florida) in the telecommunication markets as it relates to economically sensitive products in freight service and building rental activities; industry competition; natural events such as weather conditions, floods, earthquakes and forest fires; the ability of the Company to complete its financing plans; and the ultimate outcome of environmental investigations or proceedings and other types of claims and litigation. Further information on these risk factors is included in the Company's filings with Securities and Exchange Commission, including the Company's most recently filed Forms 10K and 10Q. The Company assumes no obligation to update the information contained in this news release, which speaks only as of the date of this press release.

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XO™ Wholesale Dial-Up

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Overview

XO™ Wholesale Dial-Up lets you rapidly expand your nationwide dial capacity and increase your current coverage area, without building or managing your own nationwide dial network. Wholesale Dial-Up gives you maximum flexibility in offering highly reliable Internet access while maintaining control of your own subscriber accounts. By outsourcing remote access to XO™, you can:

- Significantly reduce costs because you don't need to establish or operate your own Points of Presence (POPs)
- Free up resources to focus on value-added services like enhanced online content, web hosting and e-commerce applications
- Enhance or expand your business since you gain immediate access to a large geographic area covered by the XO nationwide IP [Dial network](#)

With Wholesale Dial-Up, XO offers you a reliable and efficient way to streamline operations while maintaining excellent end-user performance and customer service statistics.

XO is one of few fully peered, facilities-based [Tier 1 Internet backbone](#) providers in the United States. XO maintains hundreds of private peering arrangements in most major metropolitan areas - at speeds up to OC-12 - allowing you to route your customers around congested public peering points and ensuring they receive reliable connectivity as well as optimum speed and throughput. And, with self-healing SONET metro fiber rings and a meshed SuperPOP network architecture, XO provides redundancy and high availability to you.

Features

- Proxy radius server authentication
- Dial-up local and toll-free access from nationwide points of presence
- Support for V.90 and 56 Kbps (K-Flex) modem access
- Point-to-Point Protocol (PPP) support
- Secure detailed web-based end-user usage reports
- Flexible billing options
- 24 x 7 network monitoring and support
- Independent network monitoring

Pricing and Availability

XO Wholesale Dial-Up is available nationwide. XO offers Wholesale Dial-Up with both usage-based and user-based pricing, allowing you to select the method that best fits your business, and it makes it simple for

you to bill your end-users. Call XO Carrier Services toll-free today at **1.800.474.1763** or [contact us online](#).

See Also

- [Learn More About the XO™ Network](#)
- [XO Available Markets](#)

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- [Non-Current Products \(Regulated\)](#)
- [MCI Standard Business Services Agreement \(33KB, .DOC\)](#)

Related Publications

- [Frequently Asked Questions - Telecommunications Industry Detariffing Initiative](#)
- [What's New?](#)

Overview

Products

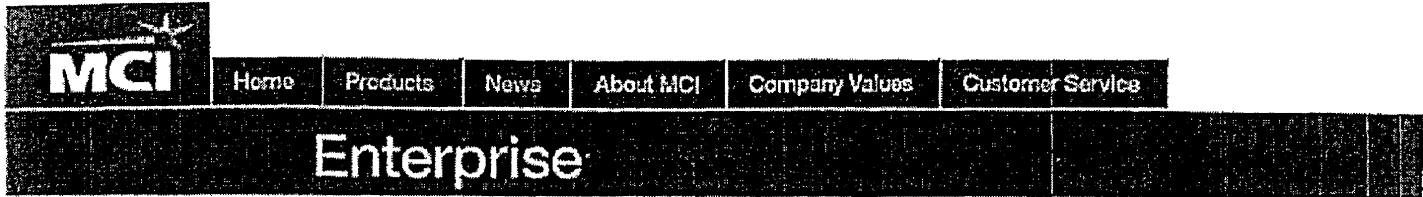
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Standard Telecommunications Products and Services

General Information

- Important Notice (25KB, .DOC)
- General Definitions (38KB, .DOC)
- General Terms and Conditions of Service (121KB, .DOC)

Products

- [...] Voice Services (Options 1, 2, and 3) (35KB, .DOC)
(previously found in MCI WorldCom Communications, Inc. Tariff FCC Nos. 1 and 6 and WorldCom Technologies, Inc. Tariff FCC No. 1)
- Domestic Private Line Services (93KB, .DOC)
(previously found in MCI WorldCom Communications, Inc. Tariff FCC No. 1 and WorldCom Network Services, Inc. Tariff FCC No. 4)
 - Voice Grade Private Line (29KB, .DOC)
 - DS0 (Digital Signal Level 0) (27KB, .DOC)
 - Fractional DS1 (28KB, .DOC)
 - DS1 (Digital Signal Level 1) (31KB, .DOC)
 - DS3 Private Line Service (28KB, .DOC)
 - SONET (27KB, .DOC)
 - Offshore State and Territories Private Line Service (45KB, .DOC)
- Crossborder Private Line Services (50KB, .DOC)
(previously found in MCI WorldCom Communications, Inc. Tariff FCC No. 1)
- International Private Line Services
(previously found in WorldCom International Data Communications, Inc. Tariff FCC Nos. 8 and 11 and MCI WorldCom Communications, Inc. No. 11)
 - Half Circuit
 - Commercial (174KB, .DOC)
 - Government (105KB, .DOC)
 - Full Circuit (392KB, .DOC)
- Access
(previously found in MCI WorldCom Communications, Inc. No. 3 and MFS Telecom, Inc. Tariff No. 2)
 - Analog Local Access (50KB, .DOC)
 - Enterprise Digital Subscriber Line (DSL) Access (47KB, .DOC)
 - [...]
 - DS0 (Hubless) Access (49KB, .DOC)
 - T-1-Digital Access (62KB, .DOC)
 - DS3 Local Access (47KB, .DOC)
 - SONET Access (45KB, .DOC)
 - Metro Private Line Access Service (155KB, .DOC)
 - Metro Private Line Ethernet Service (98KB, .DOC)

- **Frame Relay** (32KB, .DOC)
(previously found in MCI WorldCom Communications, Inc. Tariff FCC No. 1 and WorldCom Network Services, Inc. Tariff FCC Nos. 9 and 10)
- **Audioconferencing** (270KB, .DOC)
(previously found in MCI WorldCom Communications, Inc. Tariff FCC No. 1)
- **Puerto Rico Service** (273KB, .DOC)
(previously found in MCI International, Inc. Tariff FCC No. 1)
- **Guam Service** (192KB, .DOC)
(previously found in WorldCom International Data Services, Inc. Tariff FCC No. 9)

Promotions

- **Currently Offered Promotions** (25KB, .DOC)
- **Expired Promotions** (26KB, .DOC)

Other

- **Cellular Mobile Service** (27KB, .DOC)
- **Customer Support Services** (27KB, .DOC)
- **Directory Assistance** (22KB, .DOC)
- **Operator Services** (27KB, .DOC)
- **Support Services** (27KB, .DOC)
- **Telecommunications Service Priority (TSP)** (44KB, .DOC)
- **Fund** (26KB, .DOC)
- **Miscellaneous Charges, Surcharges and Fees**
 - **Carrier Access Charges (CAC)** (21KB, .DOC)
 - **Federal Annual Regulatory Fee (FARF)** (19KB, .DOC)
 - **Federal Universal Service Fund (FUSF)** (20KB, .DOC)
 - **Payphone Use Surcharge** (19KB, .DOC)