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Associate Director-Regulatory

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January 23, 2004

Ms. Blanca Bayó, Director  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tampa, FL 32399-0850

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**RE: Response of SBC Telecom, Inc. to Verizon's First Request for Information**

Dear Ms. Bayó:

Attached please find the responses of SBC Telecom, Inc. (SBCT) to the first request for admission, first request for information, and first request for production of documents from Verizon in docket nos. 030851-TP and 030852-TP.

Please note that certain questions request information that is highly confidential information. Access to this information is subject to a Protective Agreement in this proceeding. For access to this information, please contact:

Bruce May, Holland & Knight, LLP  
315 Calhoun St, Ste 600  
Tallahassee, FL 32301  
(850) 224-7000

Please call me if you have any questions or need additional information.

Sincerely,

Fred Goodwin  
Associate Director-Regulatory

Attachments

CC: Verizon

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### **III. REQUESTS FOR ADMISSION: DEDICATED TRANSPORT**

- 1. Admit that Respondent states on its website, in words or in substance, that it offers transport facilities or services to other carriers. (For the definitions of transport facilities or transport services for this and all other requests for admission, see Instruction M.)**

Deny

- 2. Admit that Respondent does not state on its website, in words or in substance, that it does not offer transport facilities or services to other carriers in Florida.**

Admit

### **IV. INTERROGATORIES: DEDICATED TRANSPORT**

- 1. Identify all fiber optic transport facilities in Florida that you own, by street address of its origination and termination points (or if no termination point, by the location of a fiber ring), as well as a description of the route between those points. (For purposes of responding to this question, your own transport facilities include facilities that you own solely or jointly, as well as facilities that you have obtained from another entity on a long-term, indefeasible right of use basis.) (For the definitions of transport facilities or transport services for this and all other interrogatories, see Instruction M.)**

SBC Telecom, Inc. neither owns nor obtains via IRUs any fiber optic transport facilities in Florida; this question is not applicable.

- 2. For each transport facility identified in response to Question 1, provide a map in an electronic form (such as MapInfo, Arcview, or another GIS program) showing its location.**

Not applicable.

- 3. For each transport facility identified in response to Question 1, identify the number of fibers in the fiber cable(s) you deployed.**

Not applicable.

- 4. For each transport facility identified in response to Question 1, identify the number of fibers that you activated (*i.e.*, "lit") through the attachment of optronics.**

Not applicable.

- 5. For each transport facility identified in response to Question 1, identify by the 11-digit CLLI code, all incumbent LEC switches and wire centers in Florida to which the transport facility is directly or indirectly connected.**

Not applicable.

- 6. For each incumbent LEC switch or wire center identified in response to Question 5, identify the optical speed at which the facilities connected to each is operating.**

Not applicable.

- 7. For each incumbent LEC switch or wire center identified in response to Question 5, identify the capacity or capacities of services (*e.g.*, DS-1, DS-3) carried by your transport facilities to and/or from the incumbent LEC switch or wire center.**

Not applicable.

- 8. For each incumbent LEC switch or wire center identified in response to Question 5, identify where you have fiber that has not been "lit" through the attachment of optronics (*i.e.*, dark fiber) and the number of unlit fibers in each transport facility terminating at that location.**

Not applicable.

- 9. Identify by the 11-digit CLLI code, all incumbent LEC switches or wire centers in Florida at which you have obtained dark fiber transport facilities from any supplier, including but not limited to from incumbent LECs.**

Please refer to SBCT's response to interrogatory no. 11.

- 10. For each dark fiber facility identified in response to Question 9, state (a) whether you have activated the dark fiber through the attachment of optronics (*i.e.*, whether the fiber is now "lit"), (b) the optical speed at which the facility operates,**



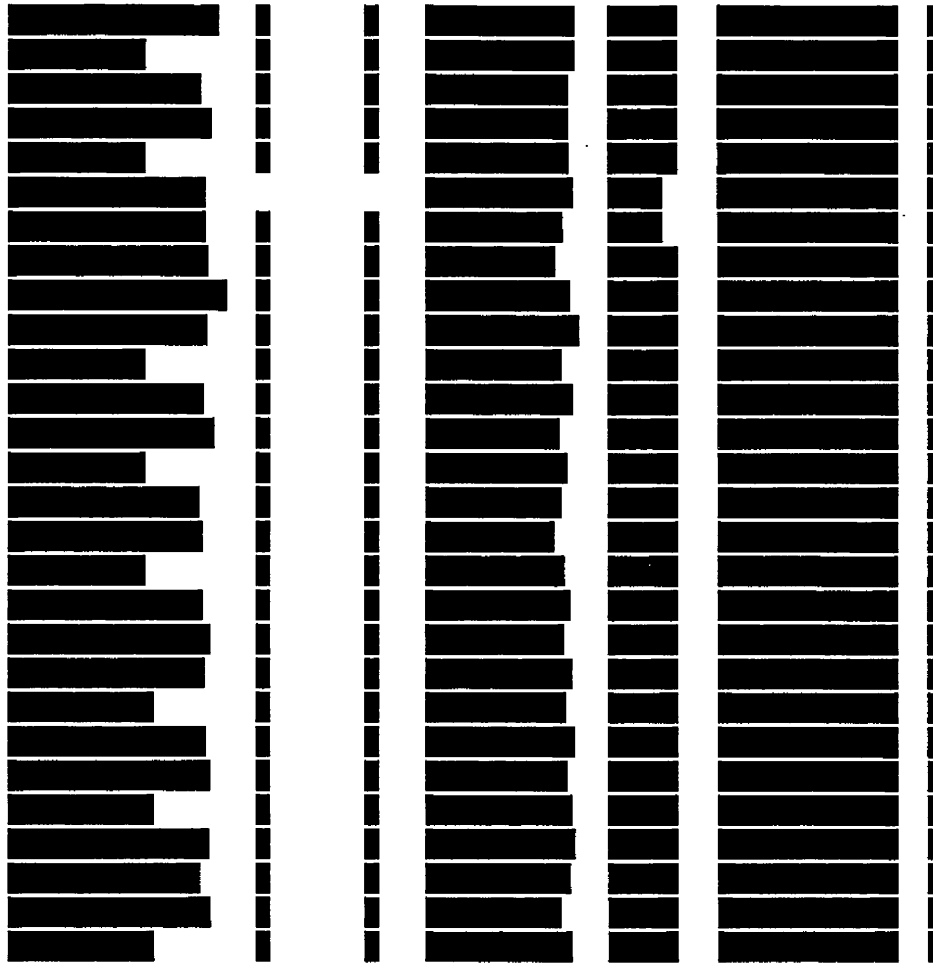
Verizon Florida Inc.'s First Request For Admissions (Nos. 1-2),  
First Set of Interrogatories (Nos. 1-21) and First Request For  
Production of Documents (Nos. 1-11) to SBC Telecom, Inc.

[REDACTED]

**TERMINATION**

[REDACTED]





12. For each transport facility identified in response to Question 11, identify by the 11-digit CLLI code, all incumbent ILEC switches and wire centers to which the transport facility is connected.

Please refer to SBCT's response to interrogatory no. 11 above.

13. For each incumbent LEC switch or wire center identified in response to Question 12, identify the optical speed at which the transport facilities connected to each operates.

Please refer to SBCT's response to interrogatory no. 11 above.

14. For each incumbent LEC switch or wire center identified in response to Question 12, identify the capacity or capacities of transport services (e.g., DS-1, DS-3) carried by the transport facility or facilities to and/or from the incumbent LEC switch or wire center.

Please refer to SBCT's response to interrogatory no. 11 above.

- 15. For all transport facilities identified in response to Questions 11 and 12, identify the non-incumbent LEC supplier from which you have obtained the facility.**

Please refer to SBCT's response to interrogatory no. 11 above.

- 16. Identify all transport facilities in Florida that you make available to other carriers, or have offered to make available to other carriers by street address of its origination and termination points, as well as a description of the route between those points.**

SBCT does not offer transport facilities to other carriers.

- 17. For each transport facility identified in response to Question 16, identify by the 11-digit CLLI code, all incumbent LEC switches and wire centers to which the transport facility is directly or indirectly connected.**

Not applicable.

- 18. For each incumbent LEC switch or wire center identified in response to Question 17, identify the optical speed at which the facilities connected to each operates.**

Not applicable.

- 19. For each incumbent LEC switch or wire center identified in response to Question 17, identify the capacity or capacities of services (e.g., DS-1, DS-3) carried by the transport facilities to and/or from the incumbent LEC switch or wire center.**

Not applicable.

- 20. For each incumbent LEC switch or wire center identified in response to Question 17, identify the carrier or carriers to which you make the transport facility available, or to which you have offered to make the facility available.**

Not applicable.



21. **Identify the points in Florida at which local network facilities that you own or use are connected to the networks of carriers other than the incumbent LECs, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence, network access point, collocation hotel, data center, or similar facility (collectively or individually, "interconnection points" or "IPs").**

Information responsive to this request is highly sensitive confidential information, provided subject to the protective order in this proceeding. Points of presence:

[REDACTED]

**V. REQUESTS FOR PRODUCTION OF DOCUMENTS: DEDICATED TRANSPORT**

1. **Provide all documents identifying the fiber optic dedicated transport in Florida that you make available, or have offered to make available (e.g., through lease, indefeasible right of use), to other carriers.**

SBCT does not offer dedicated transport to other carriers, thus the documents requested are not available.

2. **Provide all documents identifying the incumbent LEC switches or wire centers in Florida at which you have operational collocation arrangements.**

Information responsive to this request is highly sensitive confidential information, provided subject to the protective order in this proceeding.

SBCT has operational collocation arrangements at the following locations:

**SBCT Collocations in FL**

[REDACTED]

- 3. Provide all documents that discuss or describe your willingness to provide dedicated transport in Florida to other carriers.**

No such documents exist.

- 4. Provide all documents that discuss or describe the optical speeds at which your dedicated transport in Florida operates.**

Please refer to SBCT's response to interrogatory no. 11 above.

- 5. Provide all documents that discuss or describe the capacity or capacity of services (e.g., DS-1, DS-3) that you offer to other carriers, or have offered to other carriers.**

SBCT does not offer high capacity access services to carriers; the documents requested are not available.

- 6. Provide all documents that discuss or describe the capacity or capacity of services (e.g., DS-1, DS-3) that you offer in Florida to retail customers, or have offered to retail customers.**

SBCT's price sheet on file with the Commission describes the rates, terms and conditions of SBCT's grandfathered private line services, which included DS0, DS1 and higher speed services. However, SBCT no longer offers high capacity services to retail customers.

- 7. Provide all documents that discuss or describe whether you are willing to provide dark fiber dedicated transport in Florida to other carriers.**

No such documents exist.

- 8. Provide all documents that discuss or describe the dedicated transport in Florida that you obtain from other non-incumbent LEC carriers, or have obtained from other non-incumbent LECs.**

Please refer to SBCT's response to interrogatory no. 11 above.

- 9. Provide all documents that discuss or describe the capacity or capacity of services (e.g., DS-1, DS-3) in Florida that you obtain from other non-incumbent LEC carriers, or have obtained from other non-incumbent LEC carriers.**

Please refer to SBCT's response to interrogatory request no. 11 above.

- 10. Provide all documents that discuss or describe dark fiber in Florida that you obtain from other non-incumbent LEC carriers, or have obtained from other non-incumbent LEC carriers.**

Please refer to SBCT's response to interrogatory request no. 11 above.

- 11. Provide the confidential filings with respect to dedicated transport that you made with the FCC in the Triennial Review docket. (See, e.g., FCC's Triennial Review Order, ¶ 392 n.1216)**

SBCT provided no such filings with the FCC, thus the documents requested are not available.

Responsible person:

Fred Goodwin  
Associate Director-Regulatory  
SBC Telecom, Inc.