

#### **ATTACHMENT B**

FDN Communications FPSC Docket No. 030851-TP Request for Confidential Classification February 25, 2004

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF FDN'S RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES

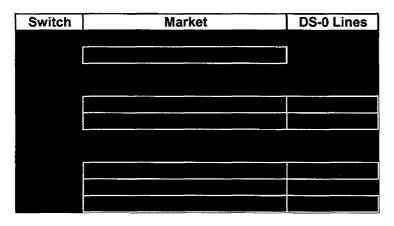
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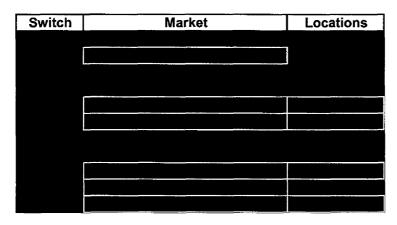
#### CONFIDENTIAL APPENDIX PSC INT. 12-A

### **INTERROGATORY:**

- 12. For the purpose of the following questions, please refer to the direct testimony of BellSouth witness Tipton, Exhibit PAT-4.
  - (d) For each switch identified in (c), please identify the number of DS0 lines served in each market.



(e) For those DS0 lines served in each market identified in (d), please indicate the number of customer locations being served by those DS0 lines.



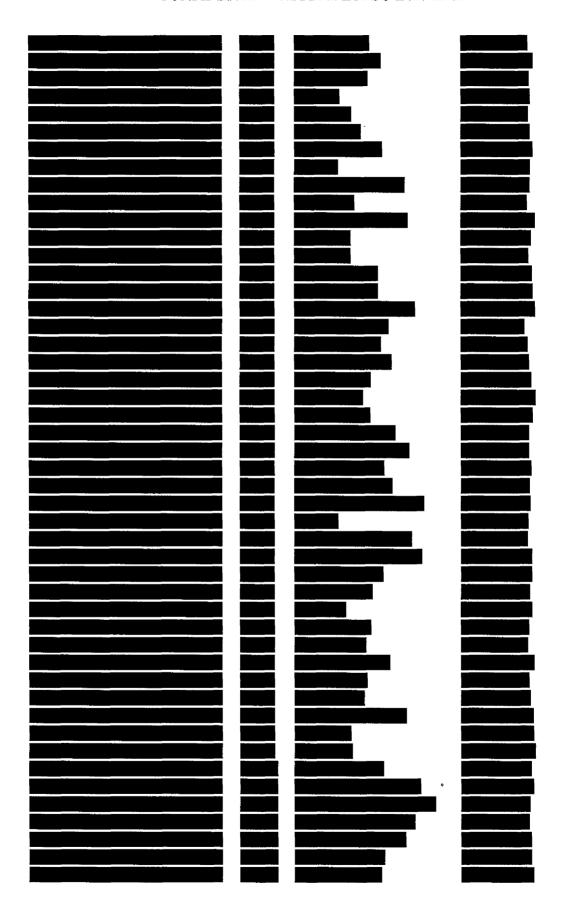
(f) Of those customer locations identified in (e), please indicate the number of customer locations with 3 or fewer DS0 lines.

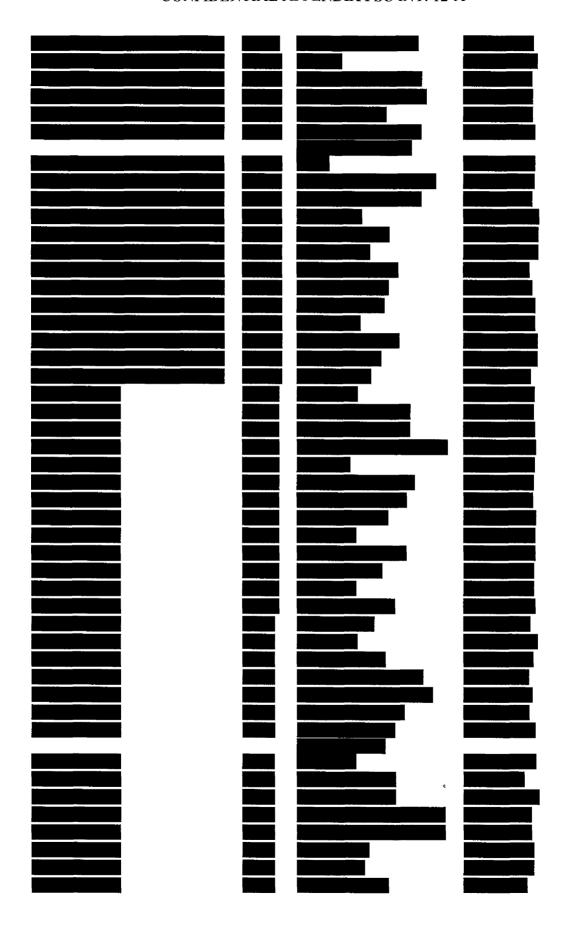
#### CONFIDENTIAL APPENDIX PSC INT. 12-A

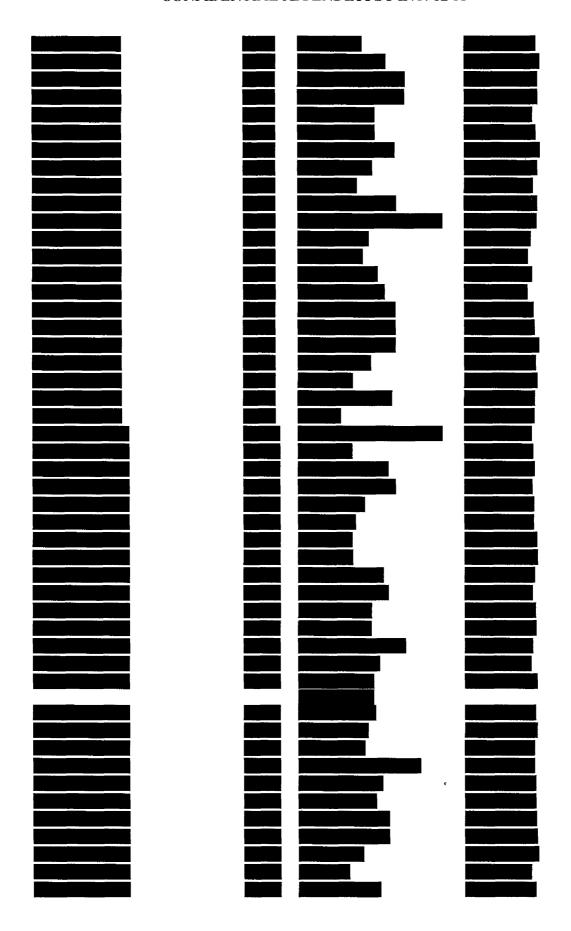
| Switch | Market | Locations |
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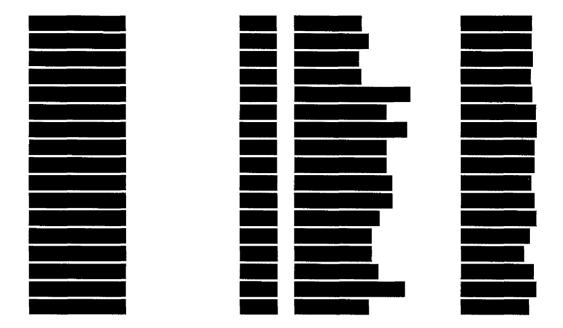
- (g) For each switch identified in (c) that provides DS0 service, please state the percent of total capacity used to provide DS0 service.
  - Each FDN switch has the capacity to serve 100,000 DS0/voice grade equivalent access lines. To serve that capacity, FDN would have to add ports and make additional investment.
- (h) For each switch identified in (c) that provides DS0 service, please state the percent of spare capacity.
  - See (d) and (g)
- (i) For each switch identified in (c), please identify the ILEC wire centers served.



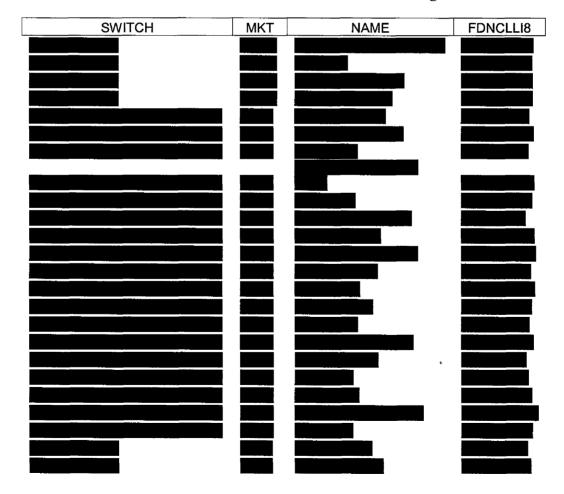


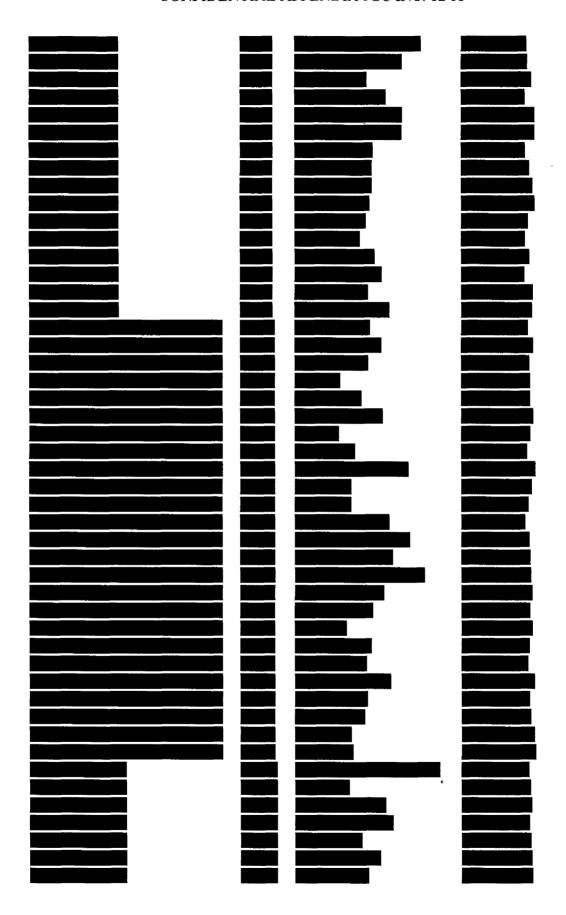




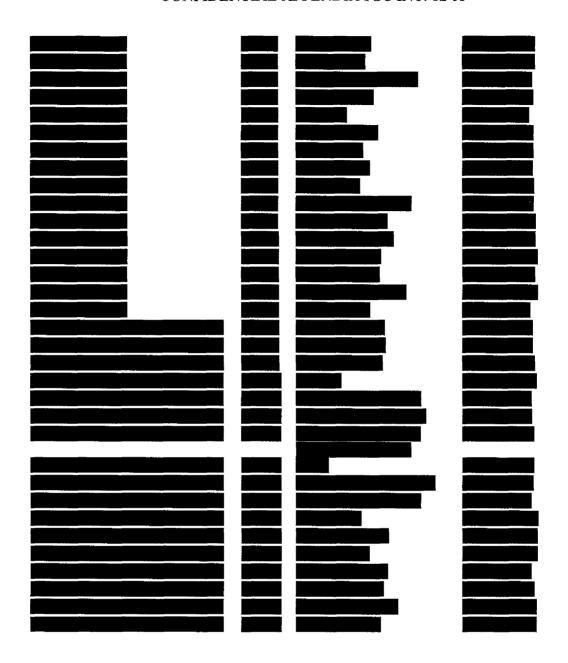


(j) Of those markets FDN has identified in (a) as having entered, please state in which wire centers FDN has collocation arrangements.





## CONFIDENTIAL APPENDIX PSC INT. 12-A



#### **INTERROGATORY:**

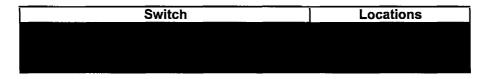
- 13. For the purpose of the following questions, please refer to the direct testimony of BellSouth witness Tipton, Exhibit PAT-4.
  - (d) For each switch identified in (c), please identify the number of DS0 lines served in each market.

| Switch | DS-0 Lines |
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(e) For those DS0 lines served in each market identified in (d), please indicate the number of customer locations being served by those DS0 lines.



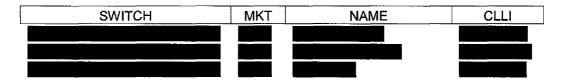
(f) Of those customer locations identified in (e), please indicate the number of customer locations with 3 or fewer DS0 lines.

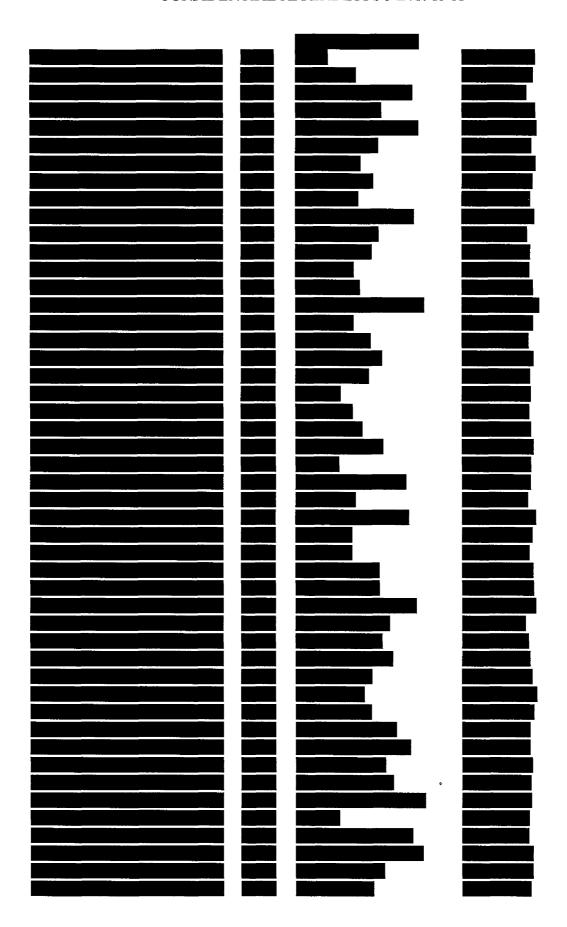


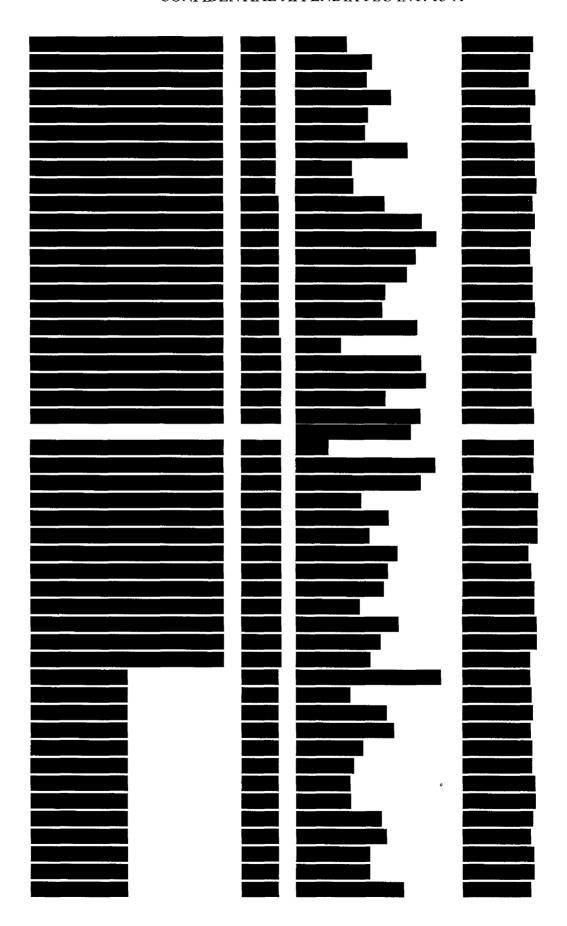
- (g) For each switch identified in (c) that provides DS0 service, please state the percent of total capacity used to provide DS0 service.
  - Each FDN switch has the capacity to serve 100,000 DS0/voice grade equivalent access lines. To serve that capacity, FDN would have to add ports and make additional investment.
- (h) For each switch identified in (c) that provides DS0 service, please state the percent of spare capacity.

See (d) and (g)

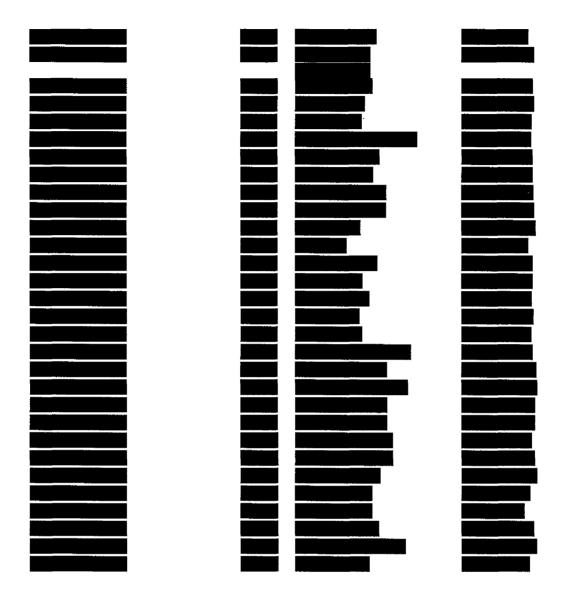
(i) For each switch identified in (c), please identify the ILEC wire centers served.





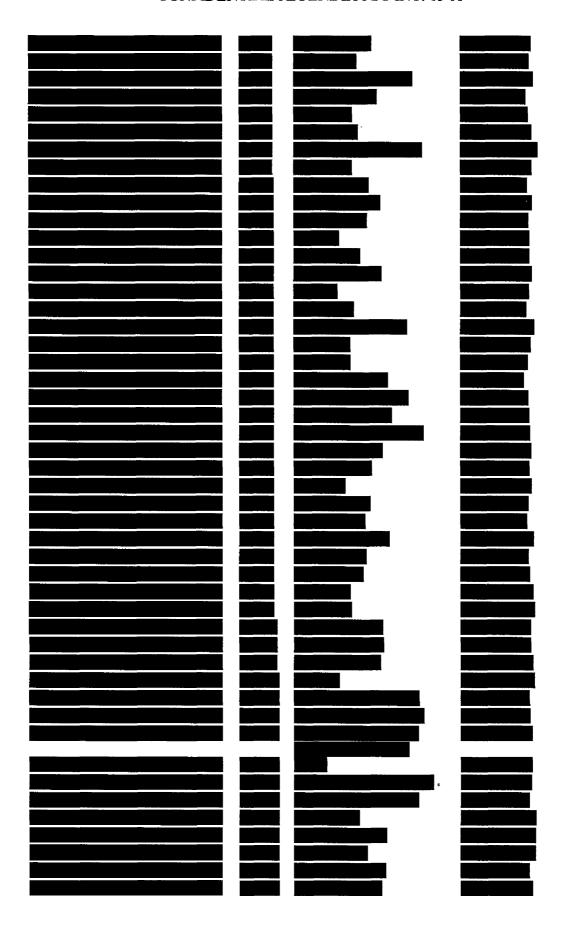


Confidential & Proprietary Subject to Protective Agreement Docket 030851 and 030852



(j) Of those markets FDN has identified in (a) as having entered, please state in which wire centers FDN has collocation arrangements.

| SWITCH | MKT | NAME | FDNCLLI8 |
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# CONFIDENTIAL APPENDIX PSC INT. 13-A

#### CONFIDENTIAL APPENDIX PSC INT 14-A

### **INTERROGATORY:**

| 14. | For the purpose of the following questions, please refer to the direct testimony of |
|-----|---|
|     | Verizon witness Fulp, Exhibit ODF-3.  |

| (d) | For each switch identified in (c), please indicate the number of DS0 lines |
|-----|--|
|     | served in each market.   |

| Switch | DS0 Lines |
|--------|-----------|
| SWILCH | D50 Lines |

(e) For those DS0 lines served in each market identified in (d), please indicate the number of customer locations being served by those DS0 lines.

| Switch | Locations |  |
|--------|-----------|--|
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(f) Of those customer locations identified in (e), please indicate the number of customer locations with 3 or fewer DS0 lines.

| Switch |  | Locations |  |
|--------|--|-----------|--|
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- (g) For each switch identified in (c) that provides DS0 service, please state the percent of total capacity used to provide DS0 service.
  - Each FDN switch has the capacity to serve 100,000 DS0/voice grade equivalent access lines. To serve that capacity, FDN would have to add ports and make additional investment.
- (h) For each switch identified in (c) that provides DS0 service, please state the percent of spare capacity.

See (d) and (g)

## CONFIDENTIAL APPENDIX PSC INT 14-A

(i) For each switch identified in (c), please identify the ILEC wire centers served.

| SWITCH | MKT | NAME | FDNCLLI8 |
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## CONFIDENTIAL APPENDIX PSC INT 14-A



(j) Of those markets FDN has identified in (a) as having entered, please state in which wire centers FDN has collocation arrangements.

| SWITCH                                | MKT                                     | NAME | FDNCLLI8 |
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#### CONFIDENTIAL APPENDIX PSC 16-A

### **INTERROGATORY:**

- 16. For the purpose of the following questions, please refer to your response to Interrogatory 15.
  - (c) For each switch identified in (c), please identify the number of DS0 lines served in each market.

| Switch | Market | DS-0<br>Lines |
|--------|--------|---------------|
|        |        |               |
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(d) For those DS0 lines served in each market identified in (d), please indicate the number of customer locations being served by those DS0 lines.

| Switch | Market | # Locations |
|--------|--------|-------------|
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(e) Of those customer locations identified in (e), please indicate the number of customer locations with 3 or fewer DS0 lines.

| Switch | Market | Locations |
|--------|--------|-----------|
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(f) For each switch identified in (c) that provides DS0 service, please state the percent of total capacity used to provide DS0 service.

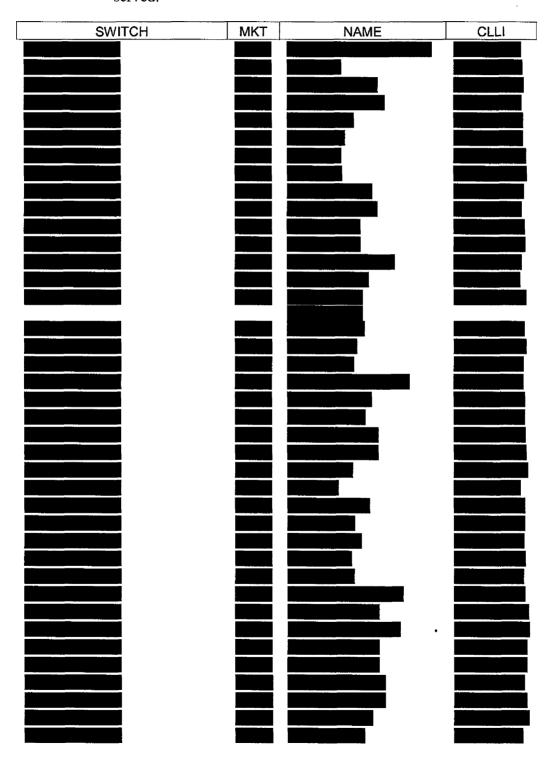
Each FDN switch has the capacity to serve 100,000 DS0/voice grade equivalent access lines. To serve that capacity, FDN would have to add ports and make additional investment.

## CONFIDENTIAL APPENDIX PSC 16-A

(g) For each switch identified in (c) that provides DS0 service, please state the percent of spare capacity.

See (c) and (f)

(h) For each switch identified in (c), please identify the ILEC wire centers served



## CONFIDENTIAL APPENDIX PSC 16-A



(i) Of those markets FDN has identified in (a) as having entered, please state in which wire centers FDN has collocation arrangements.

| SWITCH   | MKT | NAME | FDNCLL18 |
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