

REDACTED

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**

TWO REDACTED COPIES

DOCUMENT NUMBER-DATE

02860 FEB 26 3

FPSC-COMMISSION CLERK

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.

Switch	Market	DS-0 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	Market	Locations

(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
[Redacted]		[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]

(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.

SWITCH	MKT	NAME	CLLI
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIAL APPENDIX PSC INT. 12-A

[Redacted data]

(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	FDNCLI8
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

[REDACTED]

[REDACTED]

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
[REDACTED]	[REDACTED]

(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	DS-0 Lines
[REDACTED]	[REDACTED]

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

Switch	Locations
[REDACTED]	[REDACTED]

(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.

SWITCH	MKT	NAME	CLLI
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

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
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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.

Switch	Locations
[REDACTED]	[REDACTED]

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

Switch	Locations
[REDACTED]	[REDACTED]

(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)

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Table with 4 columns of redacted data.

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

Table with 4 columns: SWITCH, MKT, NAME, FDNCLI8. All data is redacted.

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 Lines
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

(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
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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

Switch	Market	Locations
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

(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.

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[REDACTED]

[REDACTED]

[REDACTED]

(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	FDNCLLI8
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]