

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 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.

Docket No. 030852-TP
Filed: March 02, 2004

**NEWSOUTH COMMUNICATIONS CORP.'S REDACTED RESPONSE
TO VERIZON FLORIDA INC.'S
FIRST SET OF INTERROGATORIES (NOS. 1-23) AND FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 1-11)**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, NewSouth Communications Corp. ("NewSouth"), by and through its undersigned attorney, hereby responds to Verizon Florida Inc.'s First Set of Interrogatories (Nos. 1-23) and First Request for Production of Documents Nos. 1-11).

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.)

RESPONSE

N/A.

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

RESPONSE

N/A.

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

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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

RESPONSE

N/A.

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, and (c) the capacity or capacities of services (e.g., DS-1, DS-3) carried by each such transport facility.

RESPONSE

N/A.

11. Identify all transport facilities in Florida that you use or possess but do not own, by street address of its origination and termination points, 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.)

RESPONSE

Subject to Claim for Confidentiality.

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.

RESPONSE

Subject to Claim of Confidentiality.

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.

RESPONSE

See CONFIDENTIAL attached report.

14. For each incumbent LEC switch or wire center identified in response to Question 12, identify the capacity or capacities to 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.

RESPONSE

See CONFIDENTIAL attached report

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.

RESPONSE

See CONFIDENTIAL attached report

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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.

RESPONSE

N/A.

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 services providers at any point of presence, network access point, collocation hotel, data center, or similar facility (collectively or individually, “interconnection points” or “IPs”).

RESPONSE

All such points of interconnection are detailed in response to question #11 above and in the attached CONFIDENTIAL report.

22. Provide a list of the customer locations to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location.

RESPONSE

N/A.

23. For each of the facilities identified in response to Question 1, please provide the following information:

- a. The suppliers from whom you have obtained those facilities.
- b. The capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) obtained to each location.

RESPONSE

N/A.

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 to use), to other carriers.

RESPONSE

N/A.

2. Provide all documents submitted in response to Staff's First Requests for Production of Documents (Nos. 1-7) and First set of Interrogatories (Nos.1-14) issued in this docket on December 10, 2003.

RESPONSE

N/A.

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

RESPONSE

N/A.

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

RESPONSE

NA.

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.

RESPONSE

N/A.

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.

RESPONSE

All offers of service and capacity to retail customers in the State of Florida are described on NewSouth's website at www.newsouth.com. See Attachment A.

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

RESPONSE

N/A.

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.

RESPONSE

Progress Telecom

TWTC

IFN/ITCD

DDR Broadband Networks

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.

RESPONSE

See Response to #8.

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.

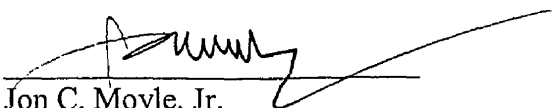
RESPONSE

N/A.

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).

RESPONSE

Information is available through the FCC and should only be obtained directly from the FCC.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
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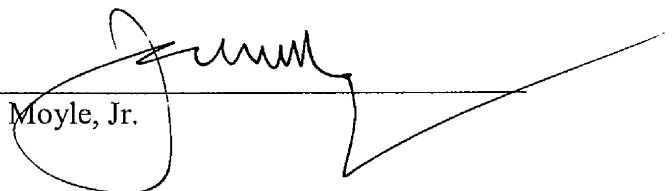
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Jon C. Moyle, Jr.

A handwritten signature in black ink, appearing to read 'Jon C. Moyle, Jr.', is written over a horizontal line. The signature is stylized and cursive.