

ATTACHMENT B-2

Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030852-TP  
Request for Confidential Classification  
March 24, 2004

REDACTED

REDACTED COPY OF ALLEGIANCE'S  
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 31, 2003 IN FPSC DOCKET NO. 030852-TP

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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 DS 1, DS3 AND  
DARK FIBER TRANSPORT

Docket No. 030852-TP

Filed: December 30, 2003

ALLEGIANCE TELECOM OF FLORIDA, INC.'S  
RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280,  
Florida Rules of Civil Procedure, Allegiance Telecom of Florida, Inc. ("Allegiance") hereby  
submits the following Responses to Staff's First Set of Interrogatories and Request for  
Production of Documents.

**Responses to Interrogatories**

1.(a) Please identify all points within Florida at which you connect your local network  
facilities to the networks of carriers other than the incumbent LEC, including interconnection  
with other CLECs, interexchange carriers, or internet service providers at any point of  
presence ("POP"), network access point ("NAP"), collocation hotel, data center, or similar  
facility.

Allegiance connects local network facilities at the following points.

COLO	CLLI ADDRESS	CITY	ZIP	V	H
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██████	████████████████████	██████	██████	██████	██████

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1        1.(b) For each transport facility identified in (a), please identify the cost of the facility,  
2 including the installation cost for any facilities that you have deployed yourself, and the rates,  
3 terms and conditions of any transport facilities that you obtain through a wholesale, lease, or  
4 resale arrangement, from any entity other than an ILEC.

5        See Objection.

6        2.(a) Please identify all competing providers with which you are not affiliated that to  
7 your knowledge have deployed dark fiber facilities (including any facilities obtained on a long-  
8 term, indefeasible right of use basis) along any routes in Florida. For each such competitor,  
9 state your basis for making this assertion.

10       (b) For each competing provider identified in (a), identify the particular route or routes  
11 along which the competitor is asserted to have such facilities. State whether or not to your  
12 knowledge those facilities terminate at a collocation arrangement where each end of the  
13 transport route is located at an ILEC premises, or in a similar arrangement at which one end  
14 of the transport route is located at an ILEC premises or where neither end is located at an  
15 ILEC premises.

16       See Objection.

17       3. Please identify all fiber rings in Florida that you own or otherwise control, and  
18 identify the location (by street address and V&H coordinates) of each add-drop multiplexer or  
19 comparable facility for connecting other transport facilities (e.g., wire centers, loops, other  
20 fiber rings) to the fiber ring.

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1 At the present time, Allegiance does not own or control any fiber rings in the state of  
2 Florida.

3 4.(a) Have you entered into an agreement for joint construction of transport facilities  
4 with any ILEC?

5 (b) If the response to (a) is affirmative, please identify the pairs of ILEC wire centers  
6 between which joint construction of transport facilities either has occurred or is planned to  
7 occur.

8 (c) If the response to (a) is affirmative, please identify the ILEC involved, when the  
9 agreement was entered into, and the status of the joint construction.

10 (d) If the response to (a) is negative, have you attempted to negotiate any agreement  
11 with an ILEC for the joint construction of transport facilities?

12 (e) If the response to (d) is affirmative, please describe any attempts made to enter into  
13 such agreements and the results of such negotiations.

14 (f) If the response to (d) is negative, please explain why no such negotiations have been  
15 attempted.

16 (g) Have you entered into an agreement for joint construction of transport facilities  
17 with any other CLEC or utility company (e.g., cable television, electric, gas, water and  
18 sewer)?

19 (h) If the response to (g) is affirmative, please identify the beginning, ending and  
20 intermediate terminating points for all such routes where joint construction of transport  
21 facilities either has occurred or is planned to occur.

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1 (i) If the response to (g) is affirmative, please identify, for each such agreement, the  
2 entities involved, when the agreement was entered into, the type of joint construction used  
3 (e.g., joint trenching, composite cable, etc.), the total cost savings achieved by the joint  
4 venture, and the status of the joint construction.

5 (j) If the response to (g) is negative, have you attempted to negotiate any agreement  
6 with any other CLEC or utility company for the joint construction of transport facilities?

7 (k) If the response to (j) is affirmative, please describe any attempts made to enter into  
8 such agreements and the results of such negotiations, whether you have evaluated any possible  
9 economic advantages of jointly constructing transport facilities and the results of any such  
10 evaluations.

11 (l) If the response to (j) is negative, please explain why no such negotiations have been  
12 attempted.

13 See Objection.

14 5.(a) Please identify the address of each of your collocation arrangements in the state of  
15 Florida, the name of the ILEC central office in which it is located, and the ILEC.

16 See Attachment 1.

17 (b) For each collocation arrangement identified in response to (a), please identify the  
18 overall size of the arrangement and the amount of unused space in the collocation  
19 arrangement.

20 (c) For each collocation arrangement identified in response to (a), please identify the  
21 date on which collocation space was turned over to you.

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1 (d) For each collocation arrangement identified in response to (a), please identify the  
2 date on which equipment was installed in the space and first used to provide local service.

3 (Estimate if necessary.)

4 (e) For each collocation arrangement identified in response to (a) that is not currently  
5 being used to provide local service, please indicate the date on which you intend to use the  
6 space to provide local service.

7 See Attachment 2.

8 6.(a) Please identify the address of each collocation arrangement in the state of Florida  
9 that you share with another entity, the identity of the other entity, and the size of your share  
10 of the arrangement.

11 At the present time, Allegiance does not share a collocation arrangement(s) with another  
12 entity in the state of Florida.

13 (b) For each of the arrangements identified in response to (a), please identify the types  
14 of services (e.g., local, broadband, etc.) you currently provide with the existing equipment  
15 located there.

16 See response to Interrogatory No. 6 (a).

17 (c) For each of the arrangements identified in response to (a), please identify the types  
18 of services (e.g., local, broadband, etc.) that the equipment is not currently being used to  
19 provide but is capable of providing.

20 See response to Interrogatory No. 6 (a).

21 (d) For each of the arrangements identified in response to (a), please identify the types  
22 of services (e.g., local, broadband, etc.) that the existing equipment is incapable of providing.

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1 See response to Interrogatory No. 6 (a).

2 (e) For those services identified in response to (d), can the equipment located in the  
3 given collocation arrangement be upgraded to provide local service?

4 See response to Interrogatory No. 6 (a).

5 (f) If the response to (e) is affirmative, please describe the nature of the required  
6 upgrade, the approximate cost of the upgrade, the time required to perform the upgrade, and  
7 any operational barriers to performing the upgrade.

8 See response to Interrogatory No. 6 (a).

9 7.(a) Please identify the address of each of your collocation arrangements in the state of  
10 Florida that you obtain from an entity other than the ILEC, entity, the identity of the other  
11 entity, the size of the arrangement, and the amount of unused space in the collocation  
12 arrangement.

13 At the present time, Allegiance does not obtain collocation arrangements from any entity  
14 other than the ILEC entities, Verizon and Bell South.

15 (b) For each of the arrangements identified in response to (a), please identify the types  
16 of services (e.g., local, broadband, etc.) you currently provide with the existing equipment  
17 located there.

18 See response to Interrogatory No. 7 (a).

19 (c) For each of the arrangements identified in response to (a), please identify the types  
20 of services (e.g., local, broadband, etc.) that the equipment is not currently being used to  
21 provide but is capable of providing.

22 See response to Interrogatory No. 7 (a).

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1 (d) For each of the arrangements identified in response to (a), please identify the types  
2 of services (e.g., local, broadband, etc.) that the existing equipment is incapable of providing.

3 See response to Interrogatory No. 7 (a).

4 (e) For those services identified in response to (d), can the equipment located in the  
5 given collocation arrangement be upgraded to provide local service?

6 See response to Interrogatory No. 7 (a).

7 (f) If the response to (e) is affirmative, please describe the nature of the required  
8 upgrade, the approximate cost of the upgrade, the time required to perform the upgrade, and  
9 any operational barriers to performing the upgrade.

10 See response to Interrogatory No. 7 (a).

11 8.(a) Are you familiar with Fiberloops ([www.fiberloops.com](http://www.fiberloops.com)), a matchmaking service  
12 for companies looking for fiber, optical bandwidth and collocation space?

13 (b) If the response to (a) is affirmative, are you now or have you been, a client of  
14 Fiberloops?

15 (c) If the response to (b) is affirmative, please describe what services Fiberloops has  
16 provided or is providing your company.

17 See Objection.

18 9.(a) For each DS1, DS3, or dark fiber loops you have deployed to customer locations in  
19 Florida, please indicate (i) whether you are collocated in a central office that serves that  
20 building; (ii) the amount of cross-connect/termination capacity available at your collocation  
21 space for wholesale facilities provided; (iii) the time it takes to provision a loop to another



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1 carrier that is collocated in the same central office; and (iv) the time it takes to provision a  
2 loop to a carrier that is not collocated in the same central office.

3 (i) Allegiance has not deployed DS1, DS3 or dark fiber loops in Florida.

4 (ii) Allegiance has no cross-connect or terminations dedicated to wholesale services.

5 (iii) Allegiance does not have any loops provisioned to another carrier in the same central  
6 office.

7 (iv) Allegiance does not have any loops provisioned to another carrier in another central  
8 office.

9 (b) With respect to the facilities identified in response to (a), please identify which, if any,  
10 were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of  
11 that facility extension and the approximate time it took to construct.

12 See response to Interrogatory No. 3.

13 10. Please identify any customer locations, by address and capacity, to which you are  
14 currently in the process of deploying your own high-capacity loop facilities (currently being  
15 planned, designed, or under construction).

16 At the present time, Allegiance has not deployed nor planned or designed high-capacity  
17 loop facilities.

18 11.(a) Are you providing fixed wireless service to end users in the state of Florida?

19 At the present time, Allegiance does not provide fixed wireless service in the state of  
20 Florida.

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1 (b) If the response to (a) is affirmative, please identify the cities in which this service is  
2 being provided and state whether those facilities are capable of providing high capacity  
3 service.

4 See response to Interrogatory No. 11(a).

5 (c) If you are providing high capacity service using fixed wireless in the state of  
6 Florida, please identify the addresses of the specific building locations.

7 See response to Interrogatory No. 11(a).

8 12(a) Do you hold licenses for wireless spectrum in the state of Florida?

9 At the present time, Allegiance does not hold licenses for wireless spectrum in the state of  
10 Florida.

11 (b) If the response to (a) is affirmative, please state in what areas in Florida and what  
12 percent of Florida customers could be covered using this spectrum.

13 See response to Interrogatory No. 12(a).

14 (c) If the response to (a) is affirmative, have you leased any of your licenses to other  
15 entities?

16 See response to Interrogatory No. 12(a).

17 (d) If the response to (c) is affirmative, please identify the entities to whom you have  
18 leased spectrum licenses.

19 See response to Interrogatory No. 12(a).

20 14.(a) Do you own or control an existing coaxial cable infrastructure?

21 Allegiance does not own or control an existing coaxial cable infrastructure.

1 (b) If the response to (a) is affirmative, please identify (i) the average cost per foot to  
2 upgrade to fiber access; (ii) whether you are offering or plan to offer high capacity service;  
3 (iii) the area within the state of Florida covered by your coax cable infrastructure; and (iv)  
4 the area within the state of Florida covered by your fiber infrastructure.

5 See response to Interrogatory No. 14(a).

6 **Response to Request for Production of Documents**

7 1.(a) Referring to Interrogatory No. 1(a), please provide any available maps or diagrams  
8 that show the location of the points of interconnection identified therein.

9 There are no such documents.

10 2. Please provide all documents that support your response to Interrogatory No. 1(b).

11 See Objection to Interrogatory 1(b).

12 3. Referring to Interrogatory No. 2(a), please provide any available maps or diagrams that  
13 show the location of competitors' dark fiber facilities.

14 See Objection to Interrogatory 2(a).

15 4. Please provide all documents that support your response to Interrogatory No. 2(b).

16 See Objection to Interrogatory 2(b).

17 5. Referring to Interrogatory No. 3, please provide any available maps or diagrams that  
18 show the location of your fiber rings.

19 There are no such documents.

20 6. Please provide copies of all agreements identified in response to Interrogatory No. 4(c).

21 See Objection to Interrogatory 4(c).

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1 7. Please provide copies of all agreements identified in response to Interrogatory No.

2 4(h).

3 See Objection to Interrogatory 4(h).

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Respectfully submitted,

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Attorneys for ALLEGIANCE TELECOM OF  
FLORIDA, INC.

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	A	B	C	D	E	F	G	H
1	<b>Docket No. 030852-TP</b>							
2	<b>Staff's First Set of Interrogatories to Allegiance Telecom, Inc. (NOS. 1 -14)</b>							
3								
4	<b><u>INTERROGATORY to CLECs – NO. 5(a)</u></b>							
5								
6	<b><u>ANSWER "CONFIDENTIAL INFORMATION"</u></b>							
7	Allegiance has the following collocation arrangements in the state of Florida:							
8	<b>COLO CLLI</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>State</b>	<b>Zip</b>	<b>V-Cord</b>	<b>H-Cord</b>	<b>ILEC</b>
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4	<u>INTERROGATORY to CLECs - NO. 5(a)</u>								
5									
6	<u>ANSWER "CONFIDENTIAL INFORMATION"</u>								
7	Allegiance has the following collocation arrangements in the state of Florida:								
8	<u>COLO</u>	<u>CLLI</u>	<u>ADDRESS</u>	<u>CITY</u>	<u>State</u>	<u>Zip</u>	<u>V-Cord</u>	<u>H-Cord</u>	<u>ILEC</u>
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3									
4	<b>INTERROGATORY to CLECs – NO. 5 (b - d)</b>								
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6	<b>ANSWER "CONFIDENTIAL INFORMATION"</b>								
7			5b	5b	5b	5c	5d	5d	5e
8	<b>CILLI Code</b>	<b>Type</b>	<b>Space occupied</b>	<b>Space reserved</b>	<b>Available Space</b>	<b>Date Collocation Space Turned Over to Allegiance</b>	<b>Date Equipment Installed</b>	<b>Date Allegiance began using the Space</b>	<b>Date Allegiance intends to use the space</b>
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7			5b	5b	5b	5c	5d	5d	5e
8	<b>CILLI Code</b>	<b>Type</b>	<b>Space occupied</b>	<b>Space reserved</b>	<b>Available Space</b>	<b>Date Collocation Space Turned Over to Allegiance</b>	<b>Date Equipment Installed</b>	<b>Date Allegiance began using the Space</b>	<b>Date Allegiance intends to use the space</b>
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63	1. The exact date the equipment was installed is unknown. However, it takes approximately 6 weeks for Allegiance to install the equipment+A46								
64	and that would occur between the date the cage was turned over to Allegiance and the date Allegiance began using the space.								

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