

REDACTED



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

undocketed

Re: Verizon's Response to the 2006 Incumbent Local Exchange Carrier (ILEC) Local
Competition Data Request

Dear Ms. Bayo:

This is in response to staff's follow-up questions regarding the annual local competition data requests. Verizon Florida Inc. ("Verizon") considers the highlighted data in this letter to be confidential because it contains proprietary information that could be used by competitors to gain an unfair competitive advantage. Therefore, this filing is made under a Claim of Confidentiality pursuant to F.S. 364.183(1) and Rule 25-22.006(5). Verizon understands the information must be kept confidential until returned to Verizon.

Verizon's responses in Table 2 listed thirty-three access lines attributed to unknown CLECs and two CLECs not found in the FPSC's database — [REDACTED], [REDACTED], and [REDACTED].

An "unknown" entry refers to system mismatch which occurred during Verizon's monthly close process. A special study would be needed to work backwards from the summary data through intermediary systems to the original billing system data to determine whether or not the missing CLEC name(s) could be identified. Due to the number of access lines in question and the resources that would be necessary to investigate further, Verizon does not believe a special study is warranted.

As clarified in a recent conversation with Victor Cordiano, Verizon identified [REDACTED] as [REDACTED]. Staff acknowledged that this CLEC currently maintains an active certificate according to the FPSC's database.

The CLEC "[REDACTED]" ([REDACTED]) was researched by Verizon's Wholesale Finance division. Verizon determined that its interconnection agreement with [REDACTED] was retired in March 2005; therefore, Verizon should not have listed [REDACTED] as an operational Florida telephone company. Because Verizon had an invalid address for the CLEC, a "final" termination letter was not sent. Verizon no longer follows this practice.

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Verizon's records show receivables for [redacted] but no current activity. The intermediary billing systems that map to Verizon's reporting and forecasting system documented five in-service resale lines as of June 30, 2006. Verizon's contract administration database, an FCC site (FCC Form 499-A Telecommunications Reporting Worksheet) and the Internet were searched for clues to possibly map the five lines to another CLEC, but to no avail.

Based on our research, it appears that sometime in 2001, [redacted] either acquired (or acquired assets of) [redacted]. According to a filing with the North Carolina Utilities Commission on July 21, 2001, BellSouth and [redacted] amended their "Resale Agreement" to include Gulf Coast among the entities covered under that agreement. This filing also declared that [redacted] assumed all [redacted] responsibilities under the North Carolina resale agreement. Verizon strongly suspects that this [redacted] transaction similarly affected the [redacted] interconnection agreement in Florida. In 2004, [redacted] Telecommunications Inc. acquired [redacted]. Effective March 1, 2005, Verizon retired the Florida [redacted] interconnection agreement because the company was "decertified" by the commission.

Verizon is conducting internal reviews to determine the standard process that occurs when an interconnection agreement is retired due to state regulatory decertification.

Verizon Florida strives to respond in a timely and accurate manner to all FPSC data requests. We appreciate staff's diligence in clarifying various issues such as this. If you have any further questions, please feel free to contact me.

Sincerely,



David M. Christian