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March 7, 2014

VIA OVERNIGHT DELIVERY

Ms. Beth W. Salak
Director
State of Florida, Office of Telecommunications
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

REDACTED

Re: MegaPath Corporation – 2014 CLEC Questionnaire

Dear Ms. Salak:

Enclosed please find the 2014 Competitive Local Exchange Carrier (CLEC) Questionnaire for MegaPath Corporation ("MegaPath") for the calendar year ending December 31, 2013. MegaPath is submitting both a redacted and confidential version of the FCC Form 477 submitted as part of the response. MegaPath considers its customer information confidential and, therefore, has marked it as such. The confidential version is being filed in a sealed and appropriately marked envelope. MegaPath requests the customer information not be publicly disclosed. This information is highly proprietary and is not available to the general public.

Please do not hesitate to contact me if you have any questions or need anything further.

Sincerely,

Bethany M. Becker
Regulatory Compliance Paralegal

/bmb
Enclosures

OFFICE OF
TELECOMMUNICATIONS
14 MAR 11 AM 7:10
14 MAR 11 AM 8:21
RECEIVED-FPSC
COMMISSION CLERK

2014 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by March 1, 2014)¹

Legal Company Name: MegaPath Corporation

D/B/A: _____

FPSC Company Code (e.g., TX000) TX237

Contact name & title: Katherine K. Mudge, Vice President - Regulatory Affairs & Litigation

Telephone number: (512) 794-6197

E-mail address: katherine.mudge@megapath.com

Stock Symbol (if company is publicly traded): N/A

1. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2013**.

2. Are you currently operating under Chapter 7 or Chapter 11 bankruptcy protection? Please check yes or no.

Yes
 No

3. What services, other than local service, does your company currently provide in Florida? Please check all that apply.

<input type="checkbox"/> Private line/special access	<input type="checkbox"/> Wholesale loops
<input checked="" type="checkbox"/> VoIP	<input type="checkbox"/> Fiber or copper based video service
<input type="checkbox"/> Wholesale transport	<input type="checkbox"/> Cable television
<input type="checkbox"/> Interexchange service	<input type="checkbox"/> Satellite television
<input type="checkbox"/> Cellular/wireless service	<input checked="" type="checkbox"/> Broadband Internet access

4. What percentage of your Florida residential and business customers purchase bundled (i.e. voice service packaged with additional services such as internet or video service) offerings? Please provide the percentage below. Do not include bundles of telecom-only services. If you do not offer bundled services, indicate "not applicable."

Residential
 Business
 Not applicable

5. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any major obstacles or barriers encountered that you believe may be impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles. Any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida are welcome.

See attached.

¹ The due date is established by Section 364.386(1)(b), Florida Statutes. Failure to comply with this rule may result in the Commission assessing penalties of up to \$25,000 per offense, with each day of noncompliance constituting a separate offense per Section 364.285(1), Florida Statutes.

5. MegaPath requires the continued availability of UNEs (e.g. loop, transport) at just and reasonable TELRIC-based rates which enable it to provide competitive offerings for broadband and VoIP services to consumers in Florida. When ILECs make the availability of UNEs difficult to obtain (e.g. OSS non-availability, UNE unavailability due to ‘facilities not available’, extended service intervals for pre-ordering, ordering provisioning, maintenance and repair, and collocation that detrimentally affect MegaPath’s ability to provide service to its customers or extends an out-of-service situation), then MegaPath is harmed. Each act, albeit perceived to be small, cumulatively becomes a barrier to entry – particularly when the ILEC retains the monopoly on providing the UNE facilities. In addition, MegaPath submits that barriers to entry apply to the small and medium-sized business market as well, when often all that is reviewed are market penetration in the residential market. Therefore, MegaPath submits that it is important to ensure that when market analysis is performed, that the small and medium-sized business markets are reviewed independently from residential markets.

Form 477 Submission for FRN: 3753787, Company: MegaPath Corporation, State: FL, Operations: Non-ILEC, Data as of Dec 31, 2013
Status: On **Feb 21, 2014**, the status for this Form 477 submission was changed to **Original - Submitted**.

All filers must complete Items 1 through 11 below

Data Description	Value
Data as of	Dec 31, 2013
1. FRN	3753787
2. Company	MegaPath Corporation
3. Type of Operations	<input type="radio"/> ILEC <input checked="" type="radio"/> Non-ILEC
4. Use this drop-down list to select a single name, such as the holding company, to identify all commonly-owned or commonly-controlled filers. Commonly-controlled filers with no holding company should decide on a single name to use for this question. Select "not shown" if no appropriate name appears in the list.	not shown
If you selected "not shown" above, type in the single name that will identify all commonly-owned or commonly-controlled filers.	MegaPath Group, Inc.
5. State	FL
6. Contact person (person who prepared the submitted data)	George A. Lucero
7. Contact person telephone number and email address	Phone. 512.794.6198 Email. george.lucero@megapath.com Confirm Email. george.lucero@megapath.com
8. Status of submission	Original - Submitted
9. Indicate whether you request non-disclosure of some or all of the information in this submission because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.	<input type="radio"/> No <input checked="" type="radio"/> Yes
10. Official (corporate officer, managing partner, or sole proprietor) whose signature certifies that he/she has examined the information contained in this Form 477 and that, to the best of his/her knowledge, information and belief, all statements of fact contained in this Form 477 are true and correct. For purposes of this Form 477, the entry of the official's name on this line shall constitute that official's electronic signature to this certification. Persons making willful false statements in a Form 477 can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).	Steve Chisholm
11. Certifying official telephone number and email address	Phone. 714.327.2075 Email. steve.chisholm@megapath.com

Part I.A: Broadband - Asymmetric xDSL

In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and/or send information to the Internet at information transfer rates exceeding 200 kbps in at least one direction. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

(1)	(2)	(3)	(4)	(5)
Total connections to end users that you (including affiliates) equipped as broadband over your own local loop facilities or the equivalent, or over UNE loops or other facilities you obtained from an unaffiliated entity. Do not convert lines into a voice-grade-equivalent measure.	Percentage of (1) that you (including affiliates) equipped over your own local loop facilities or the equivalent. (Enter 0 if the true value is 0 percent.)	Percentage of (1) that are billed (or incorporated in a service billed) to end users by you, or your affiliates or agents. (Enter 0 if the true value is 0 percent.)	Percentage of (1) that connect to residential end users. (Enter 0 if the true value is 0 percent.)	Percentage of (1) that connect to residential end users and have information transfer rates exceeding 200 kbps in both directions. (Enter 0 if the true value is 0 percent.)

Break down the total connections reported in (1) to show the non-zero number in each of the following speed tiers. If the number of connections in a particular speed tier is zero, leave that data cell blank.

Connections reported in **EACH** data cell below must equal the sum of Asymmetric xDSL connections reported in Part VI by Census Tract, for that download/upload combination, and the sum of **ALL** data cells below must equal the total connections reported in (1).

Upload information transfer rate from the end user (9 categories):	Download information transfer rate to the end user (8 categories):							
	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Greater than 200 kbps and less than 768 kbps	Greater than 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps	Greater than or equal to 100 mbps

Less than or equal to 200 kbps								
Greater than 200 kbps and less than 768 kbps								
Greater than or equal to 768 kbps and less than 1.5 mbps								
Greater than or equal to 1.5 mbps and less than 3 mbps								
Greater than or equal to 3 mbps and less than 6 mbps								
Greater than or equal to 6 mbps and less than 10 mbps								
Greater than or equal to 10 mbps and less than 25 mbps								
Greater than or equal to 25 mbps and less than 100 mbps								
Greater than or equal to 100 mbps								

This is the end of PART I.A for Asymmetric xDSL. If you are an ILEC you MUST ALSO complete Part I.B for xDSL (asymmetric or symmetric).

Part I.A: Broadband - Symmetric xDSL

In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and send information to the Internet at information transfer rates exceeding 200 kbps in both directions. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

(1)	(2)	(3)	(4)	(5)
Total connections to end users that you (including affiliates) equipped as broadband over your own local loop facilities or the equivalent, or over UNE loops or other facilities you obtained from	Percentage of (1) that you (including affiliates) equipped over your own local loop facilities or the equivalent. (Enter 0 if	Percentage of (1) that are billed (or incorporated in a service billed) to end users by you, or your affiliates or agents	Percentage of (1) that connect to residential end users. (Enter 0 if the true	Percentage of (1) that connect to residential end users and have information transfer rates exceeding 200 kbps in both directions. (Enter 0 if

groups of other facilities you obtained from an unaffiliated entity. Do not convert lines into a voice-grade-equivalent measure. (Enter 0 if the true value is 0 percent.)

equivalent. (Enter 0 if the true value is 0 percent.)

agents. (Enter 0 if the true value is 0 percent.)

value is 0 percent.)

both directions. (Enter 0 if the true value is 0 percent.)



Break down the total connections reported in (1) to show the non-zero number in each of the following speed tiers. If the number of connections in a particular speed tier is zero, leave that data cell blank.

Connections reported in **EACH** data cell below must equal the sum of Symmetric xDSL connections reported in Part VI by Census Tract, for that information transfer rate category, and the sum of **ALL** data cells below must equal the total connections reported in (1).

Information transfer rate to and from the end user (8 categories):

(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps



This is the end of PART I.A for Symmetric xDSL. If you are an ILEC you MUST ALSO complete Part I.B for xDSL (asymmetric or symmetric).

Part I.A: Broadband - Other Wireline

In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and send information to the Internet at information transfer rates exceeding 200 kbps in both directions. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

Notes specific to Other Wireline: This category includes all copper wire-based technologies other than DSL. Ethernet over copper and T-1 are examples.

(1)	(2)	(3)	(4)	(5)
Total connections to end users that you (including affiliates) equipped as broadband over your own local loop facilities or the equivalent, or over UNE loops or other facilities you obtained from an unaffiliated entity. Do not convert lines into a voice-grade-equivalent measure.	Percentage of (1) that you (including affiliates) equipped over your own local loop facilities or the equivalent. (Enter 0 if the true value is 0 percent.)	Percentage of (1) that are billed (or incorporated in a service billed) to end users by you, or your affiliates or agents. (Enter 0 if the true value is 0 percent.)	Percentage of (1) that connect to residential end users. (Enter 0 if the true value is 0 percent.)	Percentage of (1) that connect to residential end users and have information transfer rates exceeding 200 kbps in both directions. (Enter 0 if the true value is 0 percent.)



Break down the total connections reported in (1) to show the non-zero number in each of the following speed tiers. If the number of connections in a particular speed tier is zero, leave that data cell blank.

Connections reported in **EACH** data cell below must equal the sum of Other Wireline connections reported in Part VI by Census Tract, for that information transfer rate category, and the sum of **ALL** data cells below must equal the total connections reported in (1).

Information transfer rate to and from the end user (8 categories):

(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps



Part II.B: Interconnected VoIP Service

See instructions for definitions of terms used in this Part. If you report end user subscriptions in (1) - (2), you must also complete Part V of Form 477.

Reporting by State: Subscriptions reported in (1) must be reported in the state of the subscriber's "Registered Location" as of the data-collection date. (This is the most recent information obtained by an interconnected VoIP service provider that identifies the physical location of the end user. See 47 C.F.R. § 9.3.) Subscriptions reported in (2) must be reported in the same state as the broadband

connection purchased in conjunction with the VoIP service.

(1)

VoIP subscriptions that end users purchased from you without also purchasing a broadband connection from you

(2)

VoIP subscriptions that end users purchased from you in conjunction with the purchase of a broadband connection

(3)

Wholesale customers who purchased your VoIP service to resell as their own VoIP service

(a) **Total number.** See instructions on what to include.

(b) **Percentage** of (a) provided under residential grade service plans

(c) **Percentage** of (a) purchased under terms that allow use with any broadband connection ("nomadic" functionality)

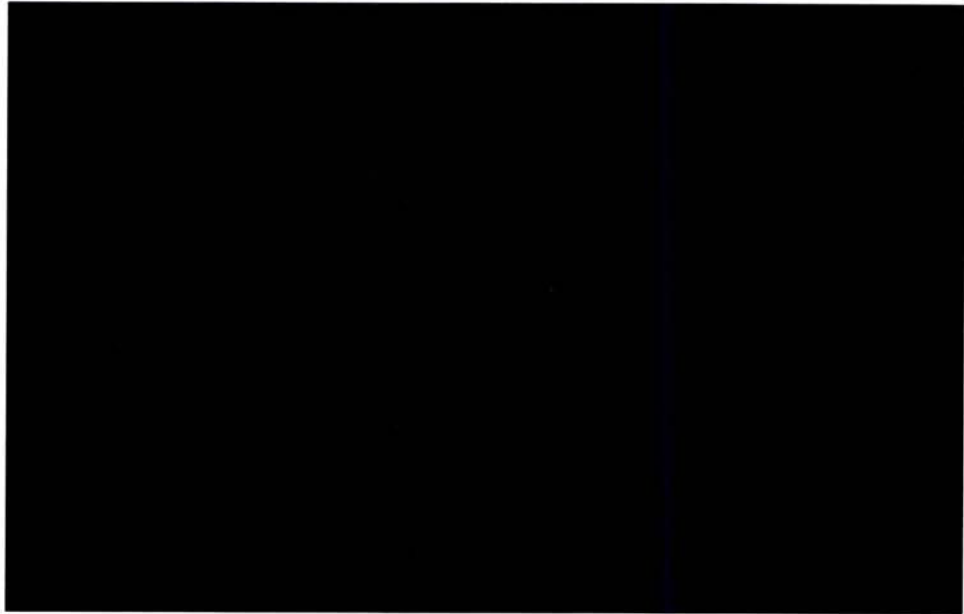
(d) **Percentage** of (a) provided in conjunction with a copper wire-based broadband connection (DSL or Other Wireline)

(e) **Percentage** of (a) provided in conjunction with a fiber-to-the-end user broadband connection

(f) **Percentage** of (a) provided in conjunction with a Cable Modem broadband connection

(g) **Percentage** of (a) provided in conjunction with a fixed wireless broadband connection

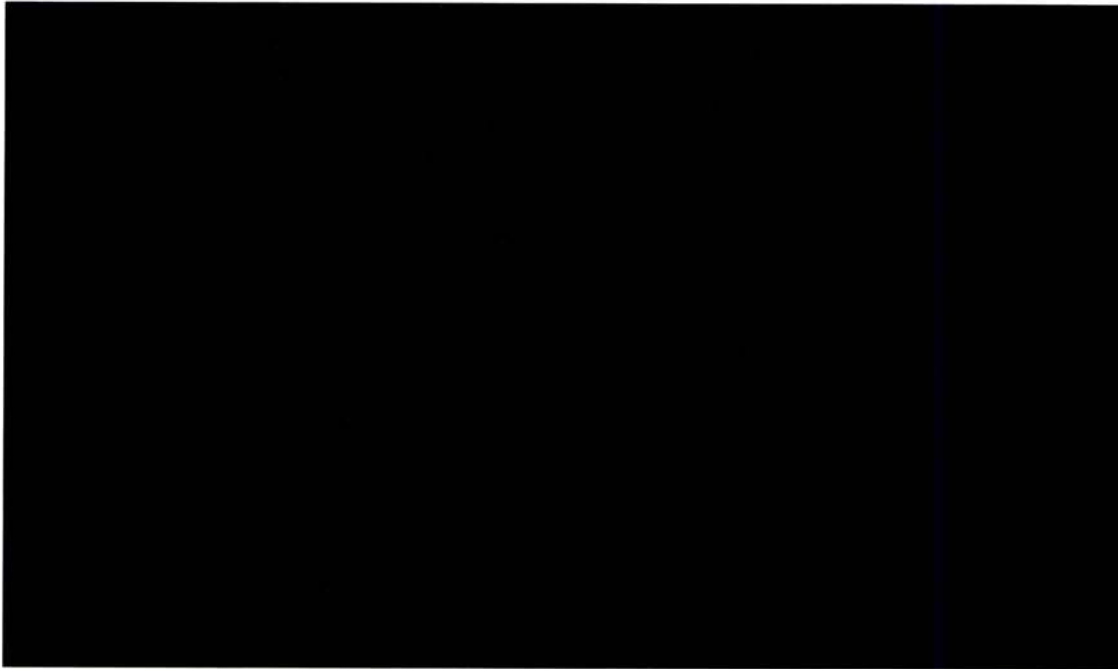
(h) **Percentage** of (a) provided in conjunction with any other type of broadband connection



Part V: Zip Code Information – Local Voice Telephone Service and Interconnected VoIP

If you reported local exchange telephone lines in service to your end user customers, in Part II.A (1), or VoIP subscriptions that end users purchased from you, in Part II.B (1) or (2), you must list the 5-digit ZIP Codes in the state in which you had end user customers. Do not include any ZIP Codes in which you offered your local exchange telephone or VoIP service but had no end user customers, and do not include any out-of-state ZIP Codes.

Type all five digit ZIP codes in the following text box, separated by either commas, spaces, or carriage returns:



Errors / Warnings

No Errors or Warnings found.

