

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Private Line and )  
Special Access Expanded )  
Interconnection )

Docket No. [REDACTED]  
Filed: September 9, 1993

NOTICE OF FILING RESPONSE TO INTERROGATORIES  
AND  
MOTION FOR PROTECTIVE ORDER AND REQUEST  
FOR CONFIDENTIAL CLASSIFICATION

Northeast Florida Telephone Company hereby gives notice of the filing of its responses to Interrogatory Nos. 6, 37, 38, 40-45 of Staff's First Set of Interrogatories and Nos. 56 and 57 of Staff's Third Set of Interrogatories, in the above docket.

For the reasons set forth below, an answer to No. 6 is not being provided to parties of record. Only this notice of filing and motion are being provided in accordance with the certificate of service. However, answers to the other interrogatories are being provided.

Northeast Florida Telephone Company pursuant to Rule 25-22.006(5), F.A.C., moves for a protective order for material filed in response to Interrogatory 6, Staff's First Set of Interrogatories, and in support of said motion, states that the material is entitled to protection and should be granted confidential classification and exemption from the operation of Section 119.07(1), F.S., for the following reasons:

1) Interrogatory 6 seeks information, and Northeast Florida Telephone Company is providing information on the specific percentage of private line and special access revenue for particular customers.

2) Special access and private line service is already a competitive service and may be even more competitive as the direct result of this docket.

3) The information being provided by Northeast Florida Telephone Company is "proprietary confidential business information," within the meaning of that term as used in Section 364.183(3)(e), F.S.

4) Other LECs have also sought confidential classification for the similar information they are providing in this docket.

5) Special access and private line traffic information is intended to be and will henceforth be treated by Northeast Florida Telephone Company as private.

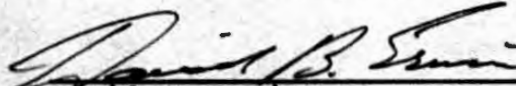
DOCUMENT NUMBER-DATE

09748 SEP-93

FPSC-RECORDS/REPORTING

Appended hereto, in an envelope marked CONFIDENTIAL, is Attachment A, which sets forth the information sought by Interrogatory 6. Edited copies with the confidential information deleted are being provided to the parties as Attachment B.

Respectfully submitted this 9th day of September, 1993.



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**CERTIFICATE OF SERVICE**  
**Docket No. 921074-TP**

I HEREBY CERTIFY that a true copy of the foregoing Notice of Filing Response to Interrogatories 6, 37, 38, 40-45, 56 and 57 and Motion for Protective Order and Request for Confidential Classification regarding No. 6 on behalf of Northeast Florida Telephone Company has been furnished by U.S. Mail or by hand delivery this 9th day of September, 1993 to the following:

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David B. Erwin, Attorney



STAFF'S FIRST SET OF INTERROGATORIES TO  
NORTHEAST, QUINCY AND SOUTHLAND  
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PAGE 1

6. List of your "large users" of private line and special access service. ("Large users" are defined as businesses that account for greater than 15% of the total revenue of the Company's private line and special access services.)
- a. Provide the percentage of the private line and special access revenue for each "large user."

RESPONSE: 

37. Do you currently have interconnection arrangements to any other provider of telecommunication service? If yes, to whom are they offered and how are they provisioned?

RESPONSE: No interconnection in our central offices. We interconnect at the Southern Bell tandem in Jacksonville.

38. What are the rates, terms and conditions which apply to those service providers who currently interconnect with your network?

RESPONSE: Not applicable.

40. What parts of the FCC's order on expanded interconnection do you disagree with and why? What alternatives do you believe are appropriate and why?

RESPONSE: We agree with that part of the FCC order that mandates the order only on Tier 1 companies.

STAFF'S FIRST SET OF INTERROGATORIES TO  
NORTHEAST, QUINCY AND SOUTHLAND  
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41. If all LECs in Florida are required to provide expanded interconnection for private line and special access, and all of your large customers choose a collocator to provide this service; provide the percentage of the total private line and special access revenue that would be lost.

RESPONSE: Approximately 47%.

42. Is it a typical practice to have long term contracts (over 2 years) with large users of your private line and special access services? What is the average length of such contracts?

RESPONSE: No.

43. Describe any discounts which are given to large private line and special access users.

RESPONSE: None.

44. If you have long term contracts (over 2 years) with its large users of private line and special access services, what type of penalties are there for early termination of contracts?

RESPONSE: We have no long term contracts at this time.

45. If expanded interconnection for private line and special access is ordered for all LECs in Florida, would you allow large users to renegotiate their contracts with you in order for you to compete with the collocators?

RESPONSE: We do not presently have contracts with our large private line and special access users. We would want to negotiate contracts with large users in order to compete.

**VERIFICATION**

I, John A. Carroll, Jr., having duly sworn, hereby state that Staff's First Set of Interrogatories in Docket No. 921074-TP have been answered by me, or the answer has been prepared under my supervision, and the answers are true and correct to the best of my knowledge and belief.

*John A. Carroll Jr.*  
\_\_\_\_\_

John A. Carroll, Jr.  
Director of Revenue Requirements  
and Regulatory Affairs  
Northeast Florida Telephone Company

Subscribed and sworn to before me, this 9<sup>th</sup> day of  
September, 1993.

*Jeanette Easterday*  
\_\_\_\_\_

Jeanette Easterday  
Print or Type Name  
Notary Public





STAFF'S THIRD SET OF INTERROGATORIES TO  
NORTHEAST, QUINCY AND SOUTHLAND  
DOCKET NO. 921074-TP  
PAGE 1

56. Provide a list of all your company's central offices. Include location by central office name, total number of access lines in service per central office, and the total number of private and special access lines per office in service.

RESPONSE: As of August 31, 1993:

Maccleddy (Host)	4531 access lines,	67 private lines
Sanderson (Remote)	872 access lines,	4 private lines
Conner (Remote)	601 access lines,	- private lines
Blackwell (Remote)	442 access lines,	- private lines
TOTAL	5446 access lines	71 private lines

57. Provide a list of all your company's central offices in Florida that houses equipment owned by AT&T.

RESPONSE: None.

**VERIFICATION**

I, John A. Carroll, Jr., having duly sworn, hereby state that Staff's Third Set of Interrogatories in Docket No. 921074-TP have been answered by me, or the answer has been prepared under my supervision, and the answers are true and correct to the best of my knowledge and belief.

*John A. Carroll, Jr.*  
\_\_\_\_\_  
John A. Carroll, Jr.

Director of Revenue Requirements  
and Regulatory Affairs  
Northeast Florida Telephone Company

Subscribed and sworn to before me, this 9<sup>th</sup> day of  
September, 1993.

*Jeanette Easterday*  
\_\_\_\_\_  
Jeanette Easterday

Print or Type Name  
Notary Public





**M E M O R A N D U M**

September 10, 1993

TO:  DIVISION OF APPEALS  
 DIVISION OF AUDITING AND FINANCIAL ANALYSIS  
 DIVISION OF COMMUNICATIONS  
 DIVISION OF ELECTRIC AND GAS  
 DIVISION OF RESEARCH  
 DIVISION OF WATER AND SEWER  
 DIVISION OF LEGAL SERVICES

FROM: DIVISION OF RECORDS AND REPORTING (FLYNN)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO.: 09749-93

DESCRIPTION: Responses to Interrogatory Nos. 6, 37,

40-45 of Staff's 1st Set and Nos. 56 and 57 of Staff's  
3rd Set

SOURCE: Northeast Florida Telephone Company

DOCKET NO.: 921074-TP

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The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

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Please read each of the following and check if applicable.

The document(s) is (are), in fact, what the utility asserts it (them) to be.