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March 14, 1996

**ORIGINAL  
FILE COPY**

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IN REPLY REFER TO:  
Tallahassee

**BY HAND DELIVERY**

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Resolution of Petition to Establish Non  
Discriminatory Rates, Terms, and Conditions  
for Interconnection Involving Local Exchange  
Companies and Alternative Local Exchange  
Companies pursuant to Section 364.162,  
Florida Statutes - Docket No. 950985-TP

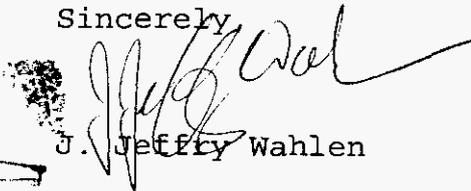
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Central Telephone Company of Florida and United Telephone Company of Florida's Third Request for Confidential Classification. This request covers those materials filed under a notice of intent on March 11, 1996. Exhibit "A" to this request, which is the highlighted/confidential version of the documents to which this request relates, is being filed contemporaneously with this request under a separate confidential cover.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

RECEIVED & FILED



JJW/csu  
Enclosures  
cc: All parties of record  
utd\950985.by0

DOCUMENT NUMBER-DATE

03121 MAR 14 96

FFSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to ) DOCKET NO. 950985-TP  
Establish Non Discriminatory Rates,) Filed: 3/14/96  
Terms, and Conditions for Inter- )  
connection Involving Local Exchange) )  
Companies and Alternative Local )  
Exchange Companies pursuant to )  
Section 364.162, Florida Statutes )  
\_\_\_\_\_ )

UNITED TELEPHONE COMPANY OF FLORIDA AND  
CENTRAL TELEPHONE COMPANY OF FLORIDA'S  
THIRD REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pursuant to Rule 25-22.006, Florida Administrative Code, UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA (collectively, "Sprint United/Centel" or the "Companies") file this Request for Specified Confidential Classification for certain information provided to the Staff in this docket, and say:

1. This request covers documents submitted to the Division of Records and Reporting under a confidential cover on March 11, 1996. These documents have been Bates stamped numbers 0165 to 0178, and represent the revised confidential answers and documents responsive to the Staff's discovery requests in this proceeding. These confidential documents were provided to Continental Cablevision, Inc., MCIMetro and MFS-FL (pursuant to non-disclosure agreements) during the discovery phase of this proceeding. These confidential documents were admitted into the record as part of Exhibit 44 during the hearing on March 11 and 12, 1996 before the Commission. The documents to which this request relates were filed

DOCUMENT NUMBER-DATE

03121 MAR 14 88

FPSC-RECORDS/REPORTING

2080

with the Division of Records and Reporting under a separate confidential cover and a Notice of Intent to Request Confidential Classification on March 11, 1996.

2. In accordance with FPSC Rule No. 25-22.006, F.A.C., a copy of the documents with the information the Companies consider to be proprietary has been filed under a separate cover as Exhibit "A" to this request and has the confidential information highlighted for identification purposes. In accordance with Rule 25-22.006, Florida Administrative Code, the Companies have appended hereto as Exhibit "B" one edited copy of the confidential answers with the confidential information blacked out ("redacted").

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is specified confidential material by demonstrating how the information falls under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on the Companies or its ratepayers will result from the disclosure of the information to the public. The Companies have identified this confidential information on a line-by-line basis, and have appended the required line-by-line identification and justifications hereto as Exhibit "C."

4. The information for which confidential treatment is requested has not been disclosed, except pursuant to a protective agreement that provides that the information will not be released to the public.

7. For all the foregoing reasons, Sprint United/Centel respectfully urge the Commission to classify the above-described and discussed document as proprietary confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, and as such exempt from Chapter 119, Florida Statutes.

WHEREFORE, UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA move the Commission to enter an Order declaring the documents claimed to be confidential in this request are proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 14th day of March, 1996.



---

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TELEPHONE COMPANY OF FLORIDA

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to ) DOCKET NO. 950985-TP  
Establish Non Discriminatory Rates,)  
Terms, and Conditions for Inter- )  
connection Involving Local Exchange) )  
Companies and Alternative Local )  
Exchange Companies pursuant to )  
Section 364.162, Florida Statutes )  
\_\_\_\_\_ )

EXHIBIT "B" TO SPRINT UNITED/CENTEL'S  
THIRD REQUEST FOR CONFIDENTIAL CLASSIFICATION

Unedited Version of Interrogatory Answers  
With  
Confidential Information Redacted

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to )  
Establish Non Discriminatory Rates, )  
Terms, and Conditions for Inter- )  
connection Involving Local Exchange )  
Companies and Alternative Local )  
Exchange Companies pursuant to )  
Section 364.162, Florida Statutes )

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DOCKET NO. 950985-TP

Dated: 3/11/96

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REVISED

CONFIDENTIAL VERSION

CENTRAL TELEPHONE COMPANY OF FLORIDA AND  
UNITED TELEPHONE COMPANY OF FLORIDA'S  
REVISED ANSWERS TO INTERROGATORIES

United Telephone Company of Florida ("Sprint-United") and  
Central Telephone Company of Florida ("Sprint-Centel")  
(collectively "Sprint-United/Centel" or the "Companies"),  
pursuant to Rule 25-22.034, Florida Administrative Code, Florida  
Rule of Civil Procedure 1.340, hereby submits the following  
revised CONFIDENTIAL Answers to the following interrogatories:

- ▶ Staff's First Set, No. 1
- ▶ Staff's Third Set, No. 64 (No. 20 in 984)
- MFS-FL's First Set, Nos. 5 and 47
- ▶ MCImetro's First Set, No. 1

These answers are being revised to reflect updated cost  
information developed by the Companies. The revisions are shown  
below in bold.

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UNITED/CENTEL  
DOCKET NO. 950985-TP  
Staff's FIRST SET  
INTERROGATORY NO. 1  
PAGE 1 OF 1

1. Please provide the current long-run incremental cost of originating or terminating a call for local interconnection purposes on a per-minute basis.

Answer: The current TSLIRC cost of originating or terminating a call for local interconnection purposes on a minute of use (MOU) basis is estimated to be as follows:

- 1 Interoffice
- 2 Local Tandem
- 3 Access Tandem

NOTE: This assumes all intra-company traffic. Interoffice assumes one class 5 office. Local Tandem assumes two class 5 offices, one of which serves as a local tandem.

The calculation of the numbers shown above and the reconciliation of the numbers shown above with the numbers in the answer to interrogatory number 20 can be found on the CONFIDENTIAL attachment to this answer.

0166

Originating and Terminating cost of Interoffice, Local Tandem and  
Access Tandem switching.

A B

- 1 Weighted Average Minutes per Message -
- 2 First Minute
- 3 Additional Minute

Interoffice:

INCREMENTAL  
COSTS

- 4 1st Minute:
- 5 Setup
- 6 KOU
- 7 SS7
- 8

CONFIDENTIAL

- 9 Additional Minute:
- 10 KOU
- SS7

LRIC COSTS:

- 11
- 12 = Incremental Cost of Weighted Average Call
- 13
- 14 = per KOU - Interoffice

0167

A

B

- 1 Weighted Average Minutes per Message -
- 2 First Minute
- 3 Additional Minute

Local Tandem:

INCREMENTAL  
COSTS

- 4 1st Minute:
- 5 Setup
- 6 MOU
- 7 SS7
- 8 Transport

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Additional Minute:

- 9 MOU
- 10 SS7
- 11 Transport
- 12

INCREMENTAL COSTS:

- 14 = Cost of Weighted Average Call
- 15
- 16 = per MOU - Local Tandem
- 17 per MOU Local Tandem
- 18 per MOU Interoffice
- 19 Total per MOU Local Tandem

0168

A

- 1 Weighted Average Minutes per Message -
- 2 First Minute
- 3 Additional Minute

Access Tandem

INCREMENTAL COSTS

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4 1st Minute: \_\_\_\_\_  
5 Setup  
6 MOU  
7 Transport

557

8 Additional Minute:  
9 MOU  
10 Transport

INCREMENTAL COSTS:

- 11 = Cost of Weighted Average Call
- 12
- 13
- 14 = per MOU - Access Tandem
- 15 - per MOU Access Tandem
- 16 - per MOU Interoffice
- 17 - Total per MOU Access Tandem

0169

INCREMENTAL COST STUDY BACKUP:

Interoffice switching cost:

	GSC	PULT	PULT	ACF	BKFD	EBD
1 Set-up	[REDACTED]					
2 MOU	LCCS	TCCS	[REDACTED]			
3 SS7	SSP	SS7	OCJET	[REDACTED]		
4 TOTAL FIRST MINUTE =	[REDACTED]					
5 TOTAL ADD'L MINUTE =	[REDACTED]					

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Local Tandem switching cost:

	GSC	PULT	PULT
6 Set-up	[REDACTED]		
7 MOU	FTCCS	TCCS	[REDACTED]
8 SS7	SSP	SS7	[REDACTED]
9 Transport	BSI fixed	miles	02/mile
10 TOTAL FIRST MINUTE =	[REDACTED]		
11 TOTAL ADD'L MINUTE =	[REDACTED]		

0170

INCREMENTAL COST STUDY BACKUP:

Access Tandem switching cost:

	GSC	PUTT	ACF	GWED	GBD
1	Set-up	[REDACTED]			
2	MOU	TRCS	[REDACTED]		
3	SS7	SS6	SS7	[REDACTED]	
4	Transport	Ds: fixed	miles	Ds:/mile	[REDACTED]
5	TOTAL FIRST MINUTE	= [REDACTED]			
6	TOTAL ADD'L MINUTE	= [REDACTED]			

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0171

**BACKUP FOR ACCESS TANDEM SWITCHING COST  
 WITH OUT TRANSPORT**

- 1 Weighted Average Minutes per Message -
- 2 First Minute
- 3 Additional Minute

Access Tandem

INCREMENTAL  
 COSTS

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4 1st Minute:  
 5 Setup  
 6 MOU  
 7 Transport

8  
 9 Additional Minute:  
 10 MOU  
 11 Transport  
 12

INCREMENTAL COSTS:

13 [REDACTED]  
 14 = TANDEM SWITCHING ONLY PER CALL  
 15 ~~Cost of Network Average Call~~  
 16 [REDACTED] IS TAN SW ONLY (EXCLUDES TRANSPORT)

17 - per MOU Access Tandem (INCLUDES TRANSPORT)  
 18 - per MOU Interoffice = END OFFICE/LOCAL SWITCHING  
 19 - Total per MOU Access Tandem

→ CALL TERMINATION INCLUDES { ACCESS  
 TANDEM SWITCH  
 TRANSPORT  
 LOCAL SWITCH

20 ACCESS TANDEM SWITCHING COST =  
 21 TRANSPORT = 3  
 22 LOCAL SWITCHING =  
 23 -

VERSUS ON  
 INTERROGATORY NO 2

BACKUP FOR LOCAL TANDEM SWITCHING COST  
 WITHOUT TRANSPORT

- 1 Weighted Average Minutes per Message -
- 2 First Minute
- 3 Additional Minute

Local Tandem:

INCREMENTAL COSTS

4 1st Minute:  
 5 Setup  
 6 MOU  
 7 SS7  
 8 Transport -  
 9 -

CONFIDENTIAL

10 Additional Minute:  
 11 MOU  
 12 SS7  
 13 Transport

INCREMENTAL COSTS:

14 [REDACTED]  
 15 LOCAL TANDEM SWITCH COST PER CALL  
 16 ~~Cost of Weighted Average Call~~  
 [REDACTED]

17 [REDACTED] per MOU - Local Tandem SWITCH ONLY (EXCLUDING TRANSPORT)

18 + per MOU Local Tandem (INCLUDES TRANSPORT)  
 19 per MOU Interoffice = END OFFICE/LOCAL SWITCHING  
 20 Total per MOU Local Tandem

CALL TERMINATION INCLUDES { LOCAL TANDEM SWITCHING  
 TRANSPORT  
 LOCAL SWITCHING

21 LOCAL TANDEM SWITCHING COST =  
 22 TRANSPORT =  
 23 LOCAL SWITCHING =

(INTEROFFICE)  
 [REDACTED] SHOWS  
 ON INTEROFFICE  
 IN 1.

Reconciliations from Interrogatory No. 20 to Interrogatory No. 1

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Access Tandem:

\$

1 Tandem Switching  
2 Local Switching  
3 Facilities Termination  
4 Switched Common Transport  
5 Total  
6 Cost Per Interrogatory No. 1  
7 Difference (rounding)

End Office:

8 Local Switching  
9 Interoffice Cost Per No. 1  
10 Difference

Local Tandem:

11 Local Tandem Switching  
12 Local Switching  
13 Facilities Termination  
14 Switched Common Transport  
15 Total  
16 Cost per Interrogatory No. 1  
17 Difference (rounding)

18 <sup>1</sup>Computed as  $\text{[redacted]} \text{ rate per mile} * \text{[redacted]} \text{ assumed}$   
19  $\text{miles} = \text{[redacted]} + \text{[redacted]} = \text{[redacted]}$   
20  $\text{transport} = (\text{Facilities termination} + \text{Switched Common}$   
21  $\text{Transport} * \text{[redacted]})$

<sup>2</sup>See note 1, above.

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UNITED/CENDEL  
DOCKET NO. 950985-TP  
STAFF'S THIRD SET  
INTERROG NO. 64b (20)  
PAGE 1 OF 1

64. b. Identify the appropriate rate level associated with each rate element identified in part a that Centel and United would propose to charge an ALEC for local interconnection under the per minute of use charge arrangement.

Answer:

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	<u>TANDEM</u> <u>Transport</u> <u>RATE ELEMENTS</u>	<u>RATE</u>	<u>COST</u>
1	DS1 Local Channel - Entrance Facility*	0.00097	
2	Switched Common Transport per minute of use per mile	0.00004	
3	Facilities Termination per MOU	0.00020	
4	Tandem Switching	0.00399	
5	Local Switching	0.00980	
6	Line Termination	0.00790	
7	Local Tandem Switching	0.00399	
	<u>END OFFICE</u> <u>Transport</u> <u>RATE ELEMENTS</u>		
8	DS1 Local Channel - Entrance Facility	0.00097	
9	Local Switching	0.00980	
10	Line Termination	0.00790	

\* Entrance Facility is optional; interconnection may also be ordered on a meet-point or virtual collocation basis in which case the special access or collocation tariffs would be applicable, respectively.

5. When did Sprint-United/Centel file its last cost study with the Florida Public Service Commission? Please provide this cost study.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to the last sentence of this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Additionally, the Companies object to the last sentence of this question on grounds that it calls for information that the Companies believe is proprietary confidential business information.

Answer: The Local Transport Restructure cost study, which was filed in September 1995 in support of the LTR tariff filing, is the most current switched access cost study that has been filed with the FPSC. However, please see the confidential revised answer to Staff's First Set of Interrogatories, No. 1, above.

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UNITED/CENDEL  
DOCKET NO. 950985-TP  
MFS' FIRST SET  
INTERROGATORY NO. 47  
PAGE 1 OF 1

47. Please list by rate element all access (interconnection) charges that an ALEC would incur (per minute) in terminating a local exchange call to Sprint-United/Centel under Sprint-United/Centel's proposal and, for each such element:
- a. Set forth the amount, if any, of contribution included in the charge; and
  - b. Please list, separately for residential and business customers, Sprint-United/Centel's charge to its own end users to terminate a local exchange call.

Objection: In addition to the general objections stated above, the Companies object to part (a) of this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide an answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

Answer: Please see revised confidential answer to Staff's Interrogatory No. 64b (originally No. 20b in Docket No. 950984-TP), above.

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0177

REVISED  
CONFIDENTIAL

UNITED/CENTEL  
DOCKET NO. 950984-TP  
DOCKET NO. 950985-TP  
MCI's FIRST SET  
INTERROGATORY NO. 1  
PAGE 1 OF 1

1. What is your most current estimate of the Total Service Long Run Incremental Cost (TSLRIC) of providing local interconnection for termination of local traffic in Florida? If a TSLRIC estimate is not available, please provide your current estimate based upon available incremental cost studies. If no estimate of the incremental cost of providing local interconnection for termination of local traffic is available, please provide your current estimate of the incremental cost of terminating switched access traffic in Florida.

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MCImetro pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MCImetro and the Companies.

Answer: Please see the confidential revised answer to Staff's First Set of Interrogatories, No. 1, above.

CONFIDENTIAL

0178

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to ) DOCKET NO. 950985-TP  
 Establish Non Discriminatory Rates,)  
 Terms, and Conditions for Inter- )  
 connection Involving Local Exchange) )  
 Companies and Alternative Local )  
 Exchange Companies pursuant to )  
 Section 364.162, Florida Statutes )  
 )

EXHIBIT "C" TO SPRINT UNITED/CENDEL'S  
 THIRD REQUEST FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Identification and Justification

Bates No.	Line	Row	Justification
0165	--	--	--
0166	1-3	Data	Note 1
0167	5-10	A	Note 2
	1-3	B	Note 2
	11-14	Data	Note 2
0168	1-3	B	Note 2
	4-12	A	Note 2
	13-19	Data	Note 2
0169	1-3	B	Note 2
	4-10	A	Note 2
	11-17	Data	Note 2
0170	1-11	Data	Note 2
0171	1-6	Data	Note 2
0172	1-23	Data	Note 2
0173	1-23	Data	Note 2
0174	1-21	Data	Note 2
0175	1-10	Cost Columns	Note 2
0176	--	--	--
0177	--	--	--
0178	--	--	--

**Note 1:** This interrogatory calls for cost data for local interconnection. Under price regulation, which the Companies have elected, the prices for services like local interconnection will be set via negotiation at market prices based on competitive factors. Cost data like this, and especially incremental cost data, constitutes valuable financial data, the disclosure of which will harm the Companies by making this data available to competitors and potential interconnectors at no cost. Disclosure of this data would harm the Companies by making sensitive cost data available to potential interconnectors during the negotiation process. Therefore, disclosure to the public would put the Companies at a competitive disadvantage in the marketplace. Entities operating in a competitive, unregulated market guard their cost data jealously,

and competitors and potential interconnectors must spend a considerable amount of money to estimate this type of data, if they can do so at all. Knowing the Companies' estimate of their own incremental cost would allow a competitor to make informed negotiating decisions as well as decisions about whether to compete and/or what price to charge for certain services. The disadvantage that would be created by public disclosure of this data would harm the Companies; therefore, the information should be deemed proprietary confidential business information.

**Note 2:** This data is cost support for the cost of originating or terminating a call for local interconnection purposes. It relates to the answer to Staff's First Set of Interrogatories, No. 1, MFS-FL's First Interrogatories, No. 5 and MCImetro's First Interrogatories, No. 1. It was produced in response to MCImetro's First POD and Staff's First POD. These pages show the derivation of LIRC costs for interoffice and local tandem, as well as the assumptions implicit in the models and data used to compute those costs. It shows cost derivations for interoffice set up, SS7 set up, and local transport, as well as assumptions and data used to compute trunk side termination costs.

Under price regulation, which the Companies have elected, the Companies will be subject to local exchange competition for certain residential and business services. Some of this competition may occur via competitors demanding to interconnect with the Companies' network and demanding unbundled network elements like loops and ports, the price for both of which be set via negotiation at market prices based on competitive factors. If competitors know the Companies' incremental cost for providing the components of its various services, they will be able to make intelligent pricing decisions calculated to harm, the Companies. Additionally, competitors will be able to make informed decisions about whether to enter a market to compete with the Companies. Cost data like this, and especially incremental cost data about the Companies' component costs of providing residential and business service, constitutes valuable financial data, the disclosure of which will harm the Companies by making this data available to competitors and potential interconnectors at no cost. Disclosure of this data would harm the Companies by making sensitive cost data available to potential interconnectors during the negotiation process. Disclosure to the public would put the Companies at a competitive disadvantage in the marketplace. Entities operating in a competitive, unregulated market guard their cost data jealously, and competitors and potential interconnectors must spend a considerable amount of money to estimate this type of data, if they can do so at all. Knowing the Companies' estimate of their own incremental cost would allow a competitor to make informed negotiating decisions as well as decisions about whether to compete and/or what price to charge for certain services. The disadvantage that would be created by public disclosure of this data would harm the Companies; therefore, the information should be deemed proprietary confidential business information.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) or overnight express (\*\*) this 14th day of March, 1996, to the following:

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