

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

RECEIVED 11/30

OCT 15 PM 4:21

In re: 1998 Competition Data Request ) Undocketed  
 )  
 ) Filed: 10-15-98

RECEIVED AND HANDLING

NATIONAL TEL'S  
AMENDED RESPONSE TO STAFF'S DATA REQUEST

On September 16, 1998, National Tel filed its responses to Staff's July 10, 1998 data request. Pursuant to Staff's request, National Tel hereby files its amended responses to Item Nos. 3(c) and 3(d): National Tel's responses to the other items of Staff's data request remain unchanged from National Tel's original response filed September 16, 1998.

AMENDED RESPONSES

- 3) If you are currently providing basic local service in Florida:
  - c) For each exchange where you are providing basic local service, please identify, by exchange (an exchange list and map are attached), the number of business access lines served. (see example below).

**RESPONSE:** This response is confidential and proprietary business information and is provided under confidential cover as Attachment 1.

- d) For each exchange where you are providing basic local service, please identify, by exchange (an exchange list and map are attached), the number of residential access lines served. (see example below).

EXAMPLES

Miami Exchange: Business Access Lines - 25  
Residential Access Lines - 0  
Tampa Exchange: Business Access lines - 60  
Residential Access Lines - 2

**RESPONSE:** This response is confidential and proprietary business information and is provided under confidential cover as Attachment 1.

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

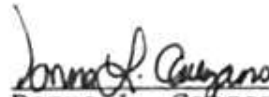
DOCUMENT NUMBER-DATE

11542 OCT 15 98

FPSC BUREAU OF RECORDS

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG \_\_\_\_\_  
LIN \_\_\_\_\_  
QPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

Dated this 15th day of October, 1998.



---

Donna L. Canzano  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard (32303)  
Suite 200  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
(850) 385-6007 telephone  
(850) 385-6008 facsimile



competitive interests. Disclosure of this information would impair the competitive business interests of National Tel by allowing competitors to determine the specific markets where National Tel conducts its business and to determine the exact number of access lines for residential and business services.

6. Attachment "A" to this Request identifies the page and line at which the confidential material is found, and correlates the page and line with the specific justification for confidential classification of the information.

7. Two copies of the information with the confidential information redacted are attached hereto as Attachment "B."

8. One highlighted copy of the information with the material which is confidential and proprietary is attached hereto in a sealed envelope as Attachment "C."

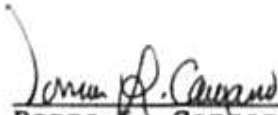
9. The information for which National Tel seeks confidential classification is not publicly available. National Tel has treated and intends to continue to treat the material for which confidential classification is sought as private, confidential information and this information has not been disclosed to the public.

WHEREFORE, based on the foregoing, National Tel respectfully requests that the Commission enter an order declaring that the information described above to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 15th day of October, 1998.

NATIONAL TEL

By:



Donna L. Cankano  
WIGGINS & VILLACORTA, P.A.  
2145 Delta Boulevard (32303)  
Suite 200  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
(850) 385-6007  
(850) 385-6008 (facsimile)

Its Attorney

pam\010\010finet.re2

**ATTACHMENT A**

**For Attachment 1 of  
National Tel's Amended Responses**

<b>PAGE</b>	<b>LINES</b>	<b>COLUMN</b>
1-14	6 - 37	A - C
15	6 - 31	A - C

**RATIONALE FOR THE INFORMATION SPECIFIED ABOVE:**

This information contains proprietary and confidential business information. This information provided in Column A shows the specific exchanges where National Tel is actually providing services. The exact number of business access lines for each exchange is provided in Column B, and the exact number of residential access is provided in Column C. This information directly relates to National Tel's competitive interests. Disclosure of this information would impair the competitive business interests of National Tel by allowing competitors to determine the specific markets where National Tel conducts its business and to determine the exact number of access lines for residential and business services. Pursuant to Section 364.183, Florida Statutes, the information thus is exempt from the disclosure requirements of Section 119.07, Florida Statutes.

ATTACHMENT B

A B C

10/07/98 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 1

EXCHANGE NAME NUMBER OF BUSINESS LINES NUMBER OF RESIDENTIAL LINES

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37



A B C

10/07/98 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 2

PSC SUMMARY REPORT FOR FLORIDA

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
5		
5		
6		
8		
10		
13		
14		
15		
16		
18		
20		
23		
23		
25		
26		
28		
30		
33		
33		
34		
36		

1 2 3 5 5 6 8 10 13 14 15 16 18 20 23 23 25 26 28 30 33 33 34 36

A B C

10/07/90 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 3

PSC SUMMARY REPORT FOR FLORIDA

EXCHANGE NAME      NUMBER OF BUSINESS LINES      NUMBER OF RESIDENTIAL LINES

2  
3  
3  
9  
8  
10  
13  
14  
15  
16  
18  
20  
23  
23  
24  
25  
29  
28  
30  
33  
33  
35  
36

A B C

10/07/98 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PAGE 4

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
5		
9		
8		
10		
13		
14		
16		
18		
20		
23		
25		
29		
28		
30		
33		
35		
39		

1 2 3 5 9 8 10 13 14 16 18 20 23 25 29 28 30 33 35 39

A B C

10/07/98 13.29:37

PSC SUMMARY REPORT FOR FLORIDA

PAGE 5

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
---------------	--------------------------	-----------------------------

1  
2  
3  
5  
6  
8  
10  
11  
13  
14  
15  
19  
18  
20  
23  
24  
25  
29  
28  
30  
33  
35  
39

A B C

10/07/98 13:29:57

PSC SUMMARY REPORT FOR FLORIDA  
FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PAGE 6

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
5		
6		
8		
10		
11		
13		
14		
15		
16		
17		
18		
20		
23		
24		
25		
26		
28		
30		
33		
34		
35		
36		

1 2 3 5 6 8 10 11 13 14 15 16 17 18 20 23 24 25 26 28 30 33 34 35 36

A . B C

10/07/78 13:29:57

PSC SUMMARY REPORT FOR FLORIDA

PAGE 7

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		
32		
33		
34		
35		
36		
37		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37

A B C

10/07/98 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 8

EXCHANGE NAME NUMBER OF BUSINESS LINES NUMBER OF RESIDENTIAL LINES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37

A . B C

10/07/08 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 9

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
3		
9		
8		
10		
13		
14		
15		
16		
17		
18		
20		
23		
24		
25		
26		
28		
30		
33		
34		
35		
36		

1 2 3 3 9 8 10 13 14 15 16 17 18 20 23 24 25 26 28 30 33 34 35 36



A . B C

10/07/98 13:29:57

PSC SUMMARY REPORT FOR FLORIDA

PAGE 10

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		

... END OF REPORT ...

ATTACHMENT C  
CONFIDENTIAL & PROPRIETARY

A B C

10/07/98 11:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 1

EXCHANGE NAME NUMBER OF BUSINESS LINES NUMBER OF RESIDENTIAL LINES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37

A B C

10/07/96 13:29:57

PAGE 2

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PSC SUMMARY REPORT FOR FLORIDA

EXCHANGE NAME      NUMBER OF BUSINESS LINES      NUMBER OF RESIDENTIAL LINES

1  
2  
3  
3  
6  
8  
10  
13  
15  
16  
18  
20  
23  
25  
26  
28  
30  
33  
35  
36

A B C

10/07/98 13:29:57

PAGE 3

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PSC SUMMARY REPORT FOR FLORIDA

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
------------------	--------------------------------	-----------------------------------

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37

A B C

10/07/98 13:29:57

PSC SUMMARY REPORT FOR FLORIDA

PAGE 4

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		
32		
33		
34		
35		
36		
37		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37

A B C

10/07/98 11.29.17

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PAGE 5

EXCHANGE NAME NUMBER OF BUSINESS LINES NUMBER OF RESIDENTIAL LINES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37

A . B C

10/07/88 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED. PAGE 6

EXCHANGE NAME NUMBER OF BUSINESS LINES NUMBER OF RESIDENTIAL LINES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37



A B C

10/07/90 15:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PAGE 7

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		
32		
33		
34		
35		
36		
37		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37

A B C

10/07/98 13:29:57

PSC SUMMARY REPORT FOR FLORIDA

PAGE 6

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
---------------	--------------------------	-----------------------------

1  
2  
3  
3  
6  
8  
10  
13  
14  
15  
17  
18  
20  
23  
24  
27  
28  
30  
33  
34  
36

A B C

10/07/98 13:29:57

PSC SUMMARY REPORT FOR FLORIDA

PAGE 9

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
---------------	--------------------------	-----------------------------

2 3 4 5 9 8 10 13 14 19 18 20 23 24 29 28 30 33 34 36

A . B C

10/07/90 13:29:57

FOR EACH EXCHANGE A TOTAL OF BUSINESS LINES & RESIDENTIAL LINES IS PRINTED.

PAGE 10

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31

EXCHANGE NAME	NUMBER OF BUSINESS LINES	NUMBER OF RESIDENTIAL LINES
------------------	--------------------------------	-----------------------------------

... END OF REPORT ...

ATTACHMENT C

CONFIDENTIAL & PROPRIETARY