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July 2, 1999

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VIA HAND DELIVERY

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

Re: Undocketed - Review of Regulated Utilities' Year 2000
Preparations and Readiness (Telecommunications)


Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of US LEC of Florida Inc.'s ("US LEC"'s) Notice of Intent to Request Confidential Classification of US LEC's Year 2000 Contingency Plan. Also enclosed are the following: (1) a separate, sealed envelope containing one copy of US LEC's Year 2000 Contingency Plan on which the information for which US LEC intends to request confidential classification is highlighted, and (2) two copies of US LEC's Year 2000 Contingency Plan with the information for which US LEC intends to request confidential information redacted.

For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter.

Thank you for your consideration in this matter.

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Sincerely,

HOLLAND & KNIGHT LLP


Karen D. Walker

08015-99

This document has been placed in
confidential storage pending advice on
handling from OPR staff.

DOCUMENT NUMBER-DA

08014 JUL-2

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Ms. Blanca S. Bayo, Director
July 2, 1999
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Enclosure
KDW/

cc: Ray Kennedy, Division of Communications (via hand delivery)
David Zipkin, US LEC of Florida Inc.

TAL-155312

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Undocketed - Review of)
Regulated Utilities' Year 2000) Filed: July 2, 1999
Preparations and Readiness)
(Telecommunications))
_____ /

**NOTICE OF INTENT TO REQUEST
CONFIDENTIAL CLASSIFICATION**

US LEC of Florida Inc. ("US LEC"), by and through undersigned counsel, pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files this Notice of Intent to Request Confidential Classification of US LEC's Year 2000 Contingency Plan.

On March 5, 1999, notice was given that the staff of the Florida Public Service Commission (the "Commission") would conduct a workshop relating to Year 2000 preparations and readiness of telecommunications companies (the "Notice"). A copy of the Notice is attached hereto as Exhibit "A." The Notice included an attachment containing questions and topics that each company was asked to be prepared to address at the workshop. The attachment to the Notice also requested that written responses to the questions be filed with the Commission. Item 14 in the attachment states:

Please describe your company's contingency or disaster recovery plans for Year 2000 related network problems and the status of such plans. If such plans are still being developed, please report the expected completion date. If such plans are not yet complete, please submit a copy to this Commission's Division of Communications prior to July 1, 1999.

US LEC is submitting its Year 2000 Contingency Plan in response to the request set forth in the Notice. US LEC's Year 2000 Contingency Plan, however, contains proprietary confidential business information as that term is defined in Section

DOCUMENT NUMBER-DATE

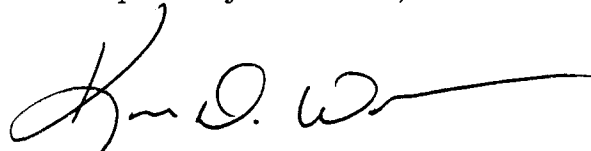
08014 JUL-28

FPSC-RECORDS/REPORTING

364.183(3), Florida Statutes. Thus, US LEC is submitting its Year 2000 Contingency Plan under cover of this Notice of Intent to Request Confidential Classification.

US LEC is submitting its Year 2000 Contingency Plan in strict accordance with the confidentiality requirements of Rule 25-22.006. Accordingly, US LEC submits herewith: (i) a separate, sealed envelope, containing one copy of US LEC's Year 2000 Contingency Plan with the information for which US LEC intends to request confidential classification highlighted; and (ii) two copies of US LEC's Year 2000 Contingency Plan with the information for which US LEC intends to request confidential classification redacted. Only the redacted copies may be made available for public inspection. By submitting its Year 2000 Contingency Plan under cover of this Notice of Intent to Request Confidential Classification, US LEC in no way shall have been deemed to waive the confidentiality of its Year 2000 Contingency Plan or its contents.

Respectfully submitted,



Karen D. Walker
Florida Bar No. 0982921
HOLLAND & KNIGHT LLP
P.O. Drawer 810
Tallahassee, FL 32302
(904) 224-7000

Attorneys for US LEC of Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

NOTICE OF STAFF WORKSHOP

TO

ALL LOCAL EXCHANGE COMPANIES
ALL ALTERNATIVE LOCAL EXCHANGE COMPANIES
ALL INTEREXCHANGE COMPANIES

AND

ALL OTHER INTERESTED PERSONS

RE: UNDOCKETED - REVIEW OF REGULATED UTILITIES' YEAR 2000
PREPARATIONS AND READINESS (TELECOMMUNICATIONS)

ISSUED: March 5, 1999

NOTICE is hereby given that the Staff of the Florida Public Service Commission will conduct a workshop, in the above-referenced matter, to which all persons are invited, at the following time and place:

9:30 a.m., Friday, March 19, 1999
Room 152, Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida

Wednesday, March 31, 1999, has also been reserved to hear further from those companies that fail to adequately address the issues set forth in this notice at the March 19, 1999, workshop. If found necessary, the March 31, 1999, workshop will begin at 1:00 p.m., and will be conducted in Room 171, Betty Easley Conference Center, 4075 Esplanade Way, Tallahassee, Florida.

PURPOSE

These workshops are intended to provide a forum for each facility-based local exchange company (LEC), alternative local exchange company (ALEC), and interexchange company (IXC) to make a presentation to explain in detail how it is testing and making preparations to make its systems year 2000 compliant and to discuss its overall operational readiness for the year 2000. One or more Commissioners may be present at these workshops. If these workshops do not generate adequate information concerning the

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EXHIBIT "A"

NOTICE OF STAFF WORKSHOP
UNDOCKETED - REVIEW OF REGULATED UTILITIES' YEAR 2000
PREPARATIONS AND READINESS (TELECOMMUNICATIONS)
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issues set forth in this notice, a docket may be opened to address this matter.

Attached to this Notice is a list of questions and topics that each company should be prepared to discuss at the March 19 workshop. Each company should file written responses to these questions on or before March 17, 1999. In its responses, each company may address any additional matters that it believes are relevant. Responses should be filed with the Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

Any person requiring some accommodation at this workshop because of a physical impairment should call the Division of Records and Reporting at (850) 413-6770 at least 48 hours prior to the workshop. Any person who is hearing or speech impaired should contact the Florida Public Service Commission by using the Florida Relay Service, which can be reached at 1-800-955-8771 (TDD).

JURISDICTION

Jurisdiction is vested in this Commission pursuant to Chapter 366, Florida Statutes. The workshop will be governed by the provisions of that Chapter and Chapters 25-4, 25-22, 25-24, and 28-106, Florida Administrative Code.

By DIRECTION of the Florida Public Service Commission, this 5th day of March, 1999.

BLANCA S. BAYÓ, Director
Division of Records and Reporting

By: Kay Flynn
Kay Flynn, Chief
Bureau of Records

(S E A L)

WCK

**Year 2000 Readiness Workshop
Questions for All Local Exchange Companies,
All Alternative Local Exchange Companies,
and All Interexchange Companies**

**March 19, 1999 - 9:30 a.m.
Florida Public Service Commission
Betty Easley Conference Center, Room 152
4075 Esplanade Way
Tallahassee, Florida**

1. What is the status of your company's Year 2000 plans and preparations? Please report your company's **overall** percentage of completion toward being fully Year 2000 compliant.
2. What specific timetables and milestones have you identified to prepare for Year 2000? For each timetable and milestone, please report the following: (1) the percentage completed and expected full-completion date; (2) the specific tasks remaining to be completed; and (3) any specific problems anticipated.
3. What is the status of the **inventory** phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.
4. What is the status of the **assessment** phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.
5. Which of your company's hardware and software systems, such as billing, administrative, customer service, infrastructure, and operational support systems, do you consider critical? For each such system, what functions (in whole or part) are done via mainframe computers and which functions electronically

NOTICE OF STAFF WORKSHOP
UNDOCKETED - REVIEW OF REGULATED UTILITIES' YEAR 2000
PREPARATIONS AND READINESS (TELECOMMUNICATIONS)
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interface with PC-based computers? How are these systems being remediated and tested? What problems have been identified that require additional work to make them Year 2000 compliant? Please report estimated completion dates for each problem identified.

6. What is the status of the **remediation**, or renovation, phase of your company's Year 2000 preparations. Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.
7. What is the status of the **testing (both unit and system)** phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified. What tests are being done or will be done on network elements and customer-affecting systems? Please describe your company's testing process, including its approach and steps.
8. Please describe your company's plans to address interoperability issues with other domestic carriers, such as LECs, IXC's, ALECs, CAPs, and wireless providers, and with interconnected networks and outside systems. Please describe the status of such plans and related discussions, including percentage of completion.
9. What network inter-operability testing has your company conducted or will your company conduct? Is your company working with ATIS and NRIC to perform network inter-operability tests? Please report the following concerning such testing: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

NOTICE OF STAFF WORKSHOP
UNDOCKETED - REVIEW OF REGULATED UTILITIES' YEAR 2000
PREPARATIONS AND READINESS (TELECOMMUNICATIONS)
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10. What is your company doing to avoid network failures that could arise due to non-compliant network providers? What safeguards are being taken? What communications channels have been opened with other network providers?
11. Please describe your company's efforts to work with suppliers of your company's critical hardware and software systems to ensure that each supplier's equipment is Year 2000 compliant. Have you inventoried supplier and third-party products? Have you established compliance standards? What tests (unit and system) remain to be completed to verify that supplier's products are Year 2000 compliant, and when will they be completed? Please describe any contingency plans your company has developed to address the situation where a supplier's product is found to be non-compliant?
12. What efforts is your company making to contact and educate critical customers to ensure that their telecommunications services and customer premises equipment (CPE) are Year 2000 compliant? What tests are being conducted or can be conducted by a customer to test its equipment?
13. What communications channels has your company established with the Department of Emergency Services' Emergency Operations Center? With other industries/companies that depend on your company's services?
14. Please describe your company's contingency or disaster recovery plans for Year 2000 related network problems and the status of such plans. If such plans are still being developed, please report the expected completion date. If such plans are complete, please bring a copy to the workshop. If such plans are not yet complete, please submit a copy to this Commission's Division of Communications prior to July 1, 1999.