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June 19, 2000

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

Re: Docket No. 991534-TP

Dear Ms. Bayó:

Pursuant to the order of Commissioner Deason as presiding officer at the hearing in Docket No. 991534-TP on June 13, 2000, Intermedia Communications Inc. ("Intermedia") herewith files Exhibit 20, an exhibit authorized to be filed post-hearing. Intermedia files said Exhibit 20 with a claim of confidentiality, pursuant to Rule 25-22.006(5), Florida Administrative Code.

A copy of this letter, which we ask you to file in the docket, is enclosed. Please mark it to indicate that such claim has been made and the original letter was filed as requested.

harus Velle Jimi Charles J. Pellegrini

Ms. Marlene Stern, Florida Public Service Commission CC.

Ms. Nancy White c/o Ms. Nancy Sims, BellSouth Telecommunications, Inc.

Mr. E. Earl Edenfield c/o Ms. Nancy Sims, BellSouth Telecommunications, Inc.

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN \\ \text{19.3-00} \\ \text{...} The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

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Exhibit 20, Filed Post-Hearing June 19, 2000 Docket No. 991534-TP

Foreword

At hearing on June 13, 2000, during the cross-examination of Intermedia witness Thomas, BellSouth introduced Exhibit 9, identified as information derived from BellSouth's "Data Warehouse." The exhibit purports to list the BellSouth tandem offices in Georgia to which Intermedia has deployed dedicated trunks for the transport of its traffic.

During the cross-examination, Mr. Thomas noted that the BellSouth data were incomplete, and did not fully show Intermedia's interconnection arrangements with BellSouth – in particular, the trunking arrangements to a tandem office in Columbus, Georgia. Accordingly, Commissioner Deason authorized Intermedia to submit a post-hearing exhibit as evidence to clarify Intermedia's trunking arrangements. In the attached pages, Intermedia submits this post-hearing exhibit, which identifies all of the BellSouth tandem offices to which Intermedia has direct trunking arrangements, for the states of Florida and Georgia – the two states that were discussed extensively during hearing.

The attached pages provide a spreadsheets listing each tandem office to which Intermedia is trunked. The tandems are identified by the tandem's Common Language Location Identifier ("CLLI") code, as well as city and state. In addition, the spreadsheet lists the date on which trunks to the various tandems were placed in service. Intermedia also provides a graphic representation of its tandem trunking arrangements, identifying the tandems by name and CLLI code, and illustrating one-way inbound and outbound trunks, two-way transit trunks, and two-way Feature Group D ("FGD") trunks. Finally, for the trunking arrangements in the Atlanta LATA – which were the subject of extensive discussion at hearing, Intermedia illustrates the trunking arrangements that existed one month prior to the execution of the Multi-Tandem Access Amendment, and the trunking arrangements that are in place today.2

As the attached materials make clear, Intermedia is direct-trunked to every access tandem in every LATA in Florida and Georgia in which Intermedia provides service. Moreover, consistent with the testimony of Intermedia's witnesses, Intermedia was direct-trunked to every access tandem in the Atlanta LATA at the time the MTA Amendment was executed.

Intermedia is, frankly, at a loss to explain why the materials submitted by BellSouth failed to show existing trunking arrangements. Of course, because each of these arrangements is cooperatively ordered, deployed and tested by Intermedia and BellSouth, BellSouth certainly had access to the correct information at all relevant times. One possible answer may be that BellSouth failed to query its database with the full set of information that would identify

Note, Intermedia adds its own designation to the standard CLLI codes that BellSouth employs. Specifically, Intermedia appends the designation "2W" to the end of the CLLI code to indicate that the trunk in place is a "two way" trunk. As a result, a tandem office listed by BellSouth as "CLMBGAMT01T" is shown on Intermedia's spreadsheet as "CLMBGAMT01T2W."

Intermedia also illustrates the trunking arrangements in place in Florida at the same time, one month before the Multi-Tandem Access Amendment.

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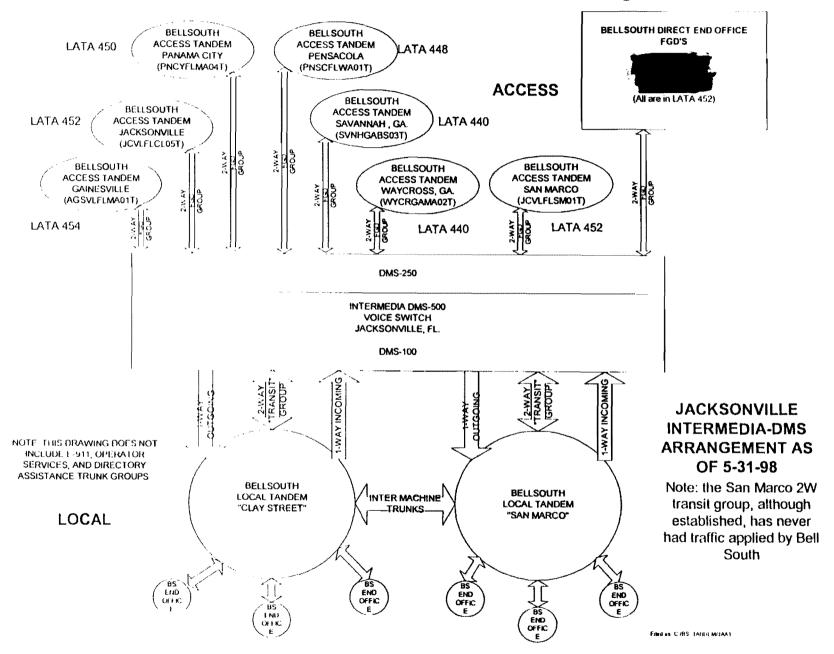
Intermedia's trunks. Intermedia understands that the BellSouth Data Warehouse lists trunks according to Access Customer Name Abbreviation ("ACNA") codes that identify the carrier. The materials provided by BellSouth list "ICF" which is indeed an ACNA designating Intermedia. However, none of the BellSouth materials list the ACNA "ESF," which also designates Intermedia. If, as it appears, BellSouth failed to run its query using both the ICF and ESF ACNAs, its query would fail to identify a substantial number of trunks that Intermedia has in service.

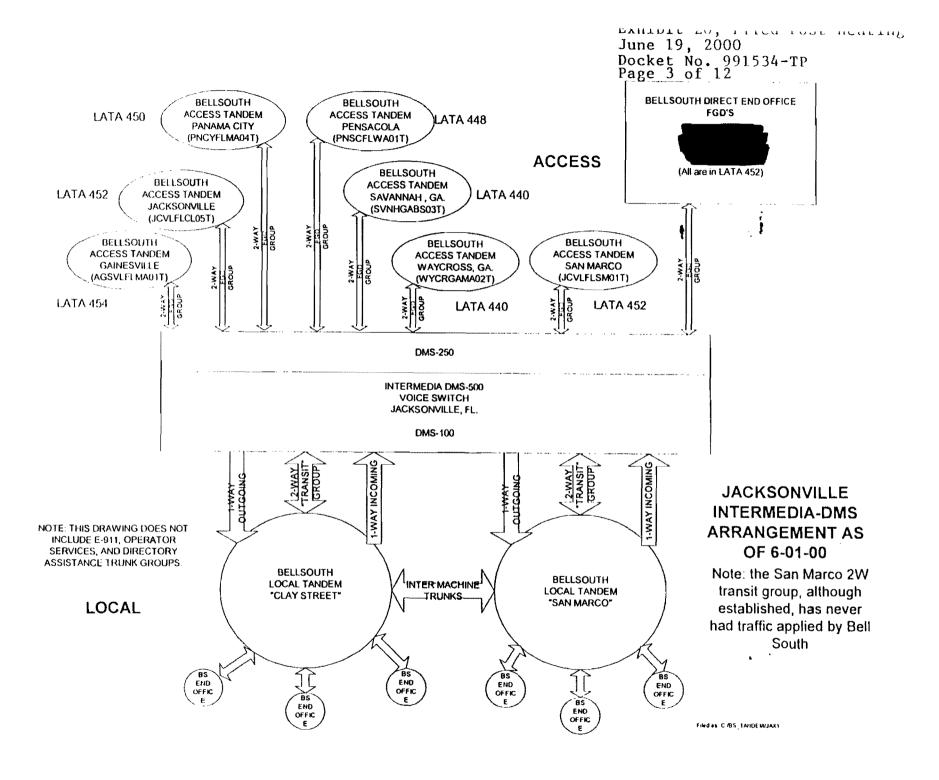
Whatever the reason, BellSouth's listing of Intermedia's trunking arrangements is incomplete and misleading. We are pleased to have the opportunity to supplement the record in this proceeding to provide correct and thorough information.

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SWITCH	LATA	TYPE	TRK CLLI	TANDEM NAME	# CRCTS	INSV DATE
INTERMEDIA/JAC	KSON	ILLE I	OCAL ACCESS CON	INECTIVITY		
JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE	LOC LOC LOC LOC LOC		JCVLFLCL052W JCVLFLCL05IC JCVLFLCL05OG JCVLFLSM012W JCVLFLSM01IC JCVLFLSM01OG	JACKSONVILLE CLAY STREET JACKSONVILLE CLAY STREET JACKSONVILLE CLAY STREET JACKSONVILLE SAN MARCO JACKSONVILLE SAN MARCO JACKSONVILLE SAN MARCO		11/6/1996 11/26/1996 11/6/1996 3/11/1998 4/18/1997 1/27/1998
INTERMEDIA/JACKS	DWILLE	FGD AC	CESS CONNECTIVITY BB	LLSOUTH TANDEMS AND END OFFICE		
JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE JACKSONVILLE	454 452 452 450 448 440 440	FGD FGD FGD FGD FGD FGD	GSVLFLMA01T2W JCVLFLCL05T2W JCVLFLSM01T2W PNCYFLMA04T2W PNSCFLWA01T2W SVNHGABS03T2W WYCRGAMA02T2W	GAINESVILLE, FL. JACKSONVILLE, FL. SAN MARCO, FL. PANAMA CITY, FL. PENSACOLA, FL. SAVANNAH, GA. WAYCROSS, GA.		6/26/1997 12/23/1996 12/19/1996 4/16/1997 2/12/1997 5/12/1997 5/12/1997
			21.110			

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SWITCH	LATA	TYPE	TRK CLLI	TANDEM NAME	# CRCTS	INSV DATE
NTERME	DIA/MI	AMILO	 CAL ACCESS C	ONNECTIVITY		
,]			1	1
МІАМІ	LOC.		NDADFLGG012W	MIAMI	or some or to	6/1/1996
MIAMI	LOC		NDADFLGG01IC	MIAMI		5 /1/1996
MIAMI	LOC		NDADFLGG010G	MIAMI		6/1/1996
МІАМІ	LOC		NDADFLGG042W	FÖRT LAUDERDALE, FL.		6/1/1996
MIAMI	LOC		NDADFLGG04IC	FORT LAUDERDALE, FL.		5/1/1996
МІАМІ	LOC	Topica con the	NDADFLGG040G	FORT LAUDERDALE, FL.		6/1/1996
МІАМІ	LOC		WPBHFLGR022W	WEST PALM BEACH, FL.		6/1/1996
MIAMI	LOC		WPBHFLGR02IC	WEST PALM BEACH, FL.		5/1/1996
MIAMI	LOC		WPBHFLGR02OG	WEST PALM BEACH, FL.		6/1/1996
TERMEDI.	A/MIAMI	FGD AC	CESS CONNECTIVI	TY (BELLSOUTH TANDEMS	& END OFFI	CES)
			i		G END OIT	L
MIAMI	460	FGD	NDADFLGG01T2W	MIAMI		8/8/1996
MIAMI	460	FGD	NDADFLGG04T2W	FORT LAUDERDALE, FL.		8/1/1996
MIAMI	460	FGD	WPBHFLGR02T2W	WEST PALM BEACH, FL.		2/5/1997
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7						
				1		
	STREET, SQUARE,					

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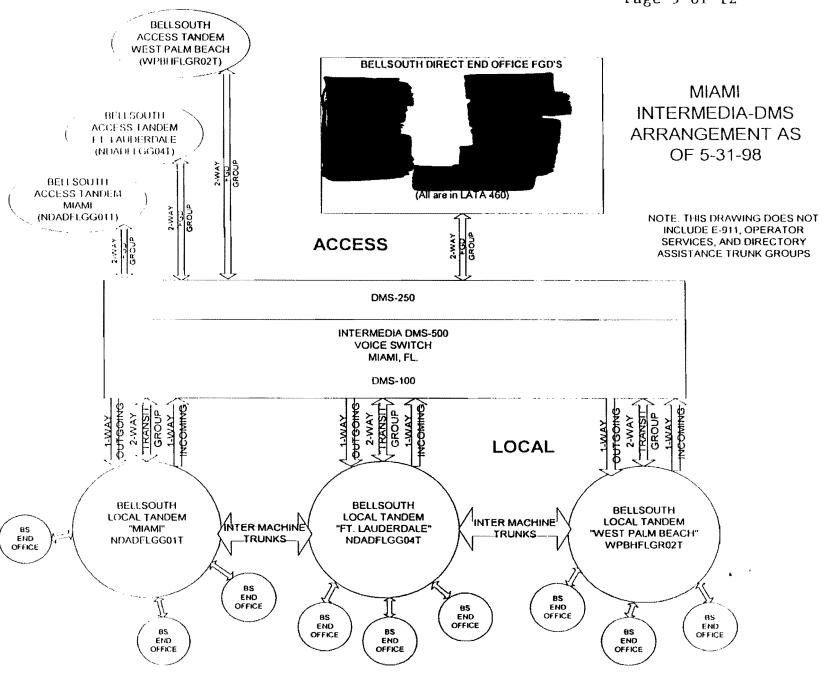


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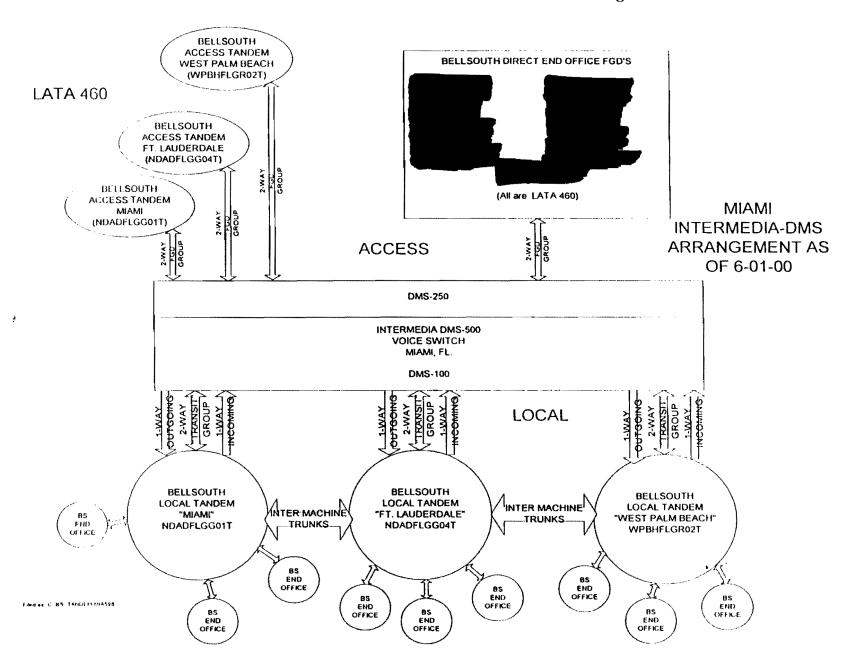


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SWITCH	LATA	TYPE	TRK CLLI	TANDEM NAME	# CRCTS	INSV DATE
INTERME	DIA/OI	RLAND	O LOCAL ACCE	SS CONNECTIVITY	water to specify to	
ORLANDO ORLANDO ORLANDO	LOC LOC		ORLDFLCL012W ORLDFLCL01IC ORLDFLCL01OG	ORLANDO COLONIAL ORLANDO COLONIAL ORLANDO COLONIAL		5/19/2000 4/2/1998 5/12/1998
ORLANDO ORLANDO ORLANDO	LOC LOC		ORLDFLMA042W ORLDFLMA04IC ORLDFLMA04OG	ORLANDO MAGNOLIA ORLANDO MAGNOLIA ORLANDO MAGNOLIA		7/26/1996 7/1/1996 7/26/1996
INTERMEDI	A/ORLA	NDO FGI	D ACCESS CONNEC	TIVITY (BELLSOUTH TAND	EMS & END C	
ORLANDO ORLANDO ORLANDO	456 458 458	FGD FGD FGD	DYBHFLPO01T2W ORLDFLCL01T2W ORLDFLMA04T2W	DAYTONA BEACH, FL. ORLANDO COLONIAL, FL ORLANDO MAGNOLIA, FL		12/24/1996 1/10/1997 1/6/1 9 97
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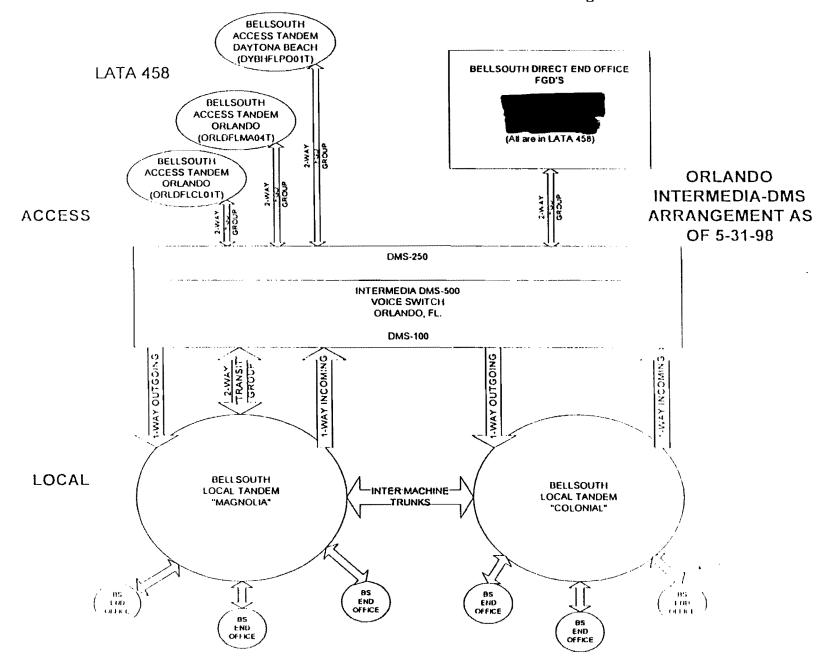


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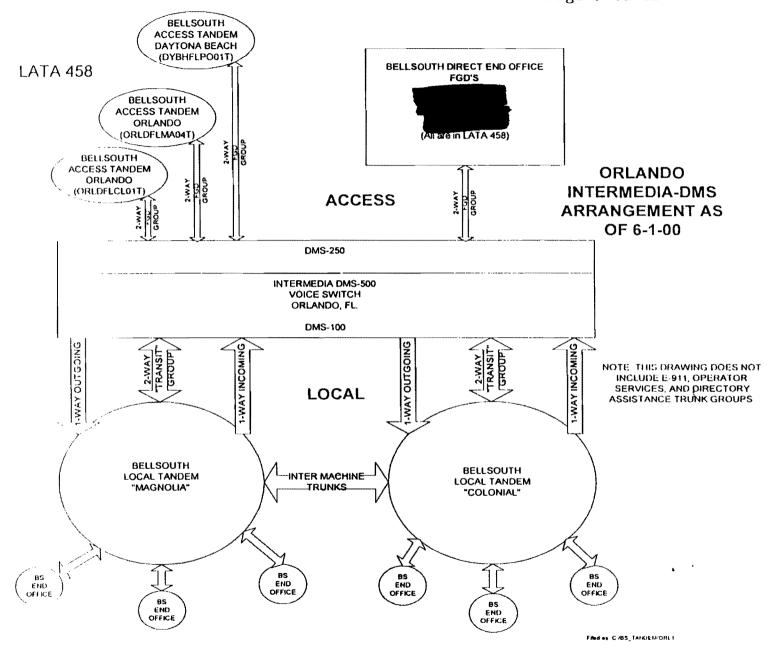


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SWITCH	LATA	TYPE	TRK CLLI	TANDEM NAME	# CRCTS	INSV DATE		
INTERME	: ΕΓΙΔ/ΔΙ	I FI ANT	A LOCAL ACCES	SS CONNECTIVITY	1			
INTERMEDIA/ATLANTA LOCAL ACCESS CONNECTIVITY								
ATLANTA		LÖC	ATHNGAMA032W	ATHENS, GA		6/44/4600		
ATLANTA		LOC	ATHNGAMA03QG	ATHENS, GA		6/11/1998		
!	! ASNOTES			RECIIPROCAL GROUP FROM THEIR	A TUISTIG TA LIS	10/29/1998		
INTERMEDIA. T	HEY ARE	OBVIOUSL	Y CARRYING THE TRAFE	IC IN A SELF IMPOSED MTA ARRAN	CEMENT NOT A	EM 10		
ARRANGEMEN	IT REQUES	TED OR SU	JPPORTED BY INTERMEDI	A IN THIS DIRECTION OF TRAFFIC II	CEMENT-NOT A	N		
ARRANGEMENT REQUESTED OR SUPPORTED BY INTERMEDIA. IN THIS DIRECTION OF TRAFFIC IT IS THE RESPONSIBILITY OF BLILL SOUTH TO ESTABLISH THE TRUNK GROUP TO INTERMEDIA.								
				1	I			
ATLANTA	1	LOC	ATLNGABU012W	ATLANTA-BUCKHEAD, GA.		5/22/1997		
ATLANTA	i	LOC	ATLNGABU01IC	ATLANTA-BUCKHEAD, GA.		6/19/1997		
ATLANTA	i .	LOC	ATLNGABU010G	ATLANTA-BUCKHEAD, GA.		5/27/1997		
			****	. ,		0. Z 17 10 3 1		
ATLANTA	1	LOC	ATLNGABU032WL	ATLANTA-BUCKHEAD, GA.		7/15/1999		
THIS IS A "LOC	AL-ONLY	" TANDEM	AND DOES NOT REQUIRE	A TRANSIT TRUNK GROUP				
	i							
ATLANIA		LOC	ATLNGAEP012W	ATLANTA-EAST POINT, GA.		5/13/1998		
ATLANTA		LOC	ATLNGAEP01IC	ATLANTA-EAST POINT, GA.		8/12/1998		
ATLANTA		LOC	ATLNGAEP010G	ATLANTA-EAST POINT, GA.		5/11/1998		
į	ì	·	A			G. 7 17 1000		
ATLANTA		LOC	GSVLGAMA032W	GAINESVILLE, GA.		3/3/2000		
ATLANTA	į	LOC	GSVLGAMA03IC	GAINESVILLE, GA.		12/14/1998		
ATLANTA	:	LOC	GSVLGAMA030G	GAINESVILLE, GA.		6/8/1998		
	1							
ATLANTA	!	LOC	NRCRGAMA012W	ATLANTA-NORCROSS, GA.		11/24/1998		
ATLANTA	i	LOC	NRCRGAMA01IC	ATLANTA-NORCROSS, GA.		9/29/1998		
ATLANTA	}	LOC	NRCRGAMA010G	ATLANTA-NORCROSS, GA.		5/1/1998		
	:							
INTERMEDIA/GEORGIA FGD ACCESS CONNECTIVITY BELLSOUTH TANDEMS ONLY)								
ATLANTA	4.40			- 1000 Mark		i		
1	442	FGD	AGSTGAMT03T2W	AUGUSTA, GA.		6/6/1997		
ATLANIA	444 438	FGD	ALBYGAMA03T2W	ALBANY, GA.		6/19/1997		
1	<u>}</u>	FGD	ATHNGAMA03T2W	ATHENS, GA		4/25/1997		
ATLANTA	438	FGD	ATLNGABU01T2W	ATLANTA-BUCKHEAD,GA.		5/22/1997		
ATLANTA	438	FGD	ATLNGAEP01T2W	ATLANTA-EAST POINT, GA.		5/14/1998		
ATLANTA	472	FGD	CHTGTNNS84T2W	CHATTANOOGA, TN.		5/23/1997		
ATLANTA	438	FGD	CLMBGAMT01T2W	COLUMBUS, GA.		4/10/1997		
ATLANTA		FGD FGD	GSVLGAMA03T2W	GAINESVILLE, GA		4/25/1997		
ATLANTA		FGD	MACNGAMT04T2W	MACON, GA.		5/30/1997		
ATLANTA		FGD	NRCRGAMA01T2W	ATLANTA-NORCROSS, GA.		4/23/1997		
, 27 1 1.7517 177	-1-1-1	FGD	VLDSGAMA02T2W	VALDOSTA, GA.		6/26/1997		

Docket No. 991534-TP Page 11 of 12 **LATA 442 LATA 438 ACCESS** BELLSOUTH BELLSOUTH BELLSOUTH **ACCESS TANDEM** ACCESS TANDEM ACCESS TANDEM COLUMBUS **AUGUSTA** EASTPOINT (ATLNGAEPOIT) (CLMBGAMT01T) (AGSTGAMT031) **LATA 444 LATA 446** BELLSOUTH BELLSOUTH ACCESS TANDEM BELLSOUTH ACCESS TANDEM BELLSOUTH ACCESS TANDEM GAINESVILLE VALDOSTA ACCESS TANDEM BUCKHEAD (GNVLGAMA03T) (VLDSGAMA02T) MACON (MACNGAMT04T) (ATENGABURIT) **LATA 472** BELL SOUTH BELLSOUTH BELLSOUTH ACCESS TANDEM BELLSOUTH ACCESS TANDEM ACCESS TANDEM ACCESS TANDEM ATHENS NORCROSS ALBANY (ATHNGAMA03T) (NRCRGAMA01T) (ALBYGAMA03T) CHATTANOOGA (CHTGTNNS84T) DMS-250 **INTERMEDIA DMS-500 VOICE SWITCH** ATLANTA, GA. DMS-100 **ATLANTA INTERMEDIA-DMS** ARRANGEMENT AS OF 5-31-98 BELLSOUTH BELLSOUTH BELLSOUTH LOCAL TANDEM LOCAL TANDEM LOCAL TANDEM NOTE: THIS DRAWING DOES NOT "EAST POINT" "NORCROSS" LOCAL "BUCKHEAD" INCLUDE E-911, OPERATOR NRCRGAMA01T ATLNGAEP01T ATLNGABU01T SERVICES, AND DIRECTORY **ASSISTANCE TRUNK GROUPS** Find as C/85 TANKERHILING ARLS BS END OFFICE END OFFICE BS END OFFICE BS EHD OFFICE OFFICE

Exhibit 20, Filed Post-Hearing

June 19, 2000

