

1 Q. PLEASE PROVIDE ADDITIONAL INFORMATION, WITH RESPECT
 2 TO THE ORLANDO AREA, REGARDING THE SERVICE MCIIm
 3 PROVIDES TODAY.

4 A. In the Orlando market, MCIIm has a network configured and equipped to serve
 5 fourteen rate centers, and MCIIm currently has customers in nine of these rate
 6 centers. MCIIm's Orlando switch has a current equipped capacity of
 7 approximately [REDACTED] DS0s, and currently provides customers with more than
 8 [REDACTED] local circuits. Through its fiber network, the Orlando switch serves [REDACTED]
 9 [REDACTED] on-net buildings in [REDACTED] cities. In addition, MCI has established [REDACTED]
 10 collocation arrangements in [REDACTED] BellSouth and Sprint wire centers. These
 11 collocation arrangements are connected to the switch via SONET transport
 12 systems that ride our fiber facilities. Additional SONET transport systems
 13 provide internodal transport between and among the local nodes and the switch.

14 Q. PLEASE PROVIDE ADDITIONAL INFORMATION, WITH RESPECT
 15 TO THE SOUTH FLORIDA AREA, REGARDING THE SERVICE MCIIm
 16 PROVIDES TODAY.

17 A. In the South Florida area, the MCIIm/MWC network has had three switches and
 18 has been configured and equipped to serve twelve rate centers. (Since I filed my
 19 Direct Testimony, we have added a fourth switch in the South Florida area. The
 20 information I describe below does not include the capacity of this new switch.)
 21 Combined, the current total equipped capacity of these switches is approximately
 22 [REDACTED] DS0s. MCIIm and MWC currently have customers in eleven of these rate
 23 centers. MCIIm and MWC provide these customers with more than [REDACTED] local

APP
 CAF
 CMP
 COM
 CTR
 ECR
 LEG
 OPC
 PAI
 RGO
 SEC
 SER
 OTH

1 circuits. Through the fiber network these switches serve [REDACTED] on-net
2 buildings in [REDACTED] cities. [REDACTED] collocation arrangements have been established in
3 [REDACTED] BellSouth wire centers. As in Orlando, these collocation arrangements are
4 connected to the appropriate switches via SONET transport systems that ride our
5 fiber facilities, and additional SONET transport systems provide internodal
6 transport between and among the local nodes and the switch.

7
8 Issue 3: Should BellSouth be required, pursuant to Part A Section 2.2 or
9 2.4 of the interconnection agreement, to execute amendments to its
10 interconnection agreements with MCIIm and MWC requiring BellSouth to
11 compensate MCIIm and MWC at the sum of the tandem interconnection
12 rate and the end office interconnection rate for calls terminated on their
13 switches that serve a geographic area comparable to the area served by
14 BellSouth's tandem switches?

15
16 **Q. DOES MS. COX CHALLENGE MCIIm’S AND MWC’S**
17 **UNDERSTANDING OF PART A SECTION 2.2 AND 2.4?**

18 **A.** No. Ms. Cox simply restates BellSouth’s position that the parties’
19 Interconnection Agreements are consistent with FCC Rule 51.711 and Orders of
20 this Commission. For the reasons I stated in my Direct Testimony, the
21 Interconnection Agreements should be amended as MCIIm and MWC are
22 requesting in this docket.

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