

Beverly Y. Menard  
Regulatory & Governmental Affairs  
Assistant Vice President (FL/GA)



ORIGINAL

Verizon Communications  
201 N. Franklin St., FLTC0616  
Tampa, FL 33602-5167

Phone 813.483.2526  
Fax: 813.223.4888  
beverly.menard@verizon.com

August 16, 2000

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

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RECORDS AND REPORTING

Dear Ms. Bayo:

**Subject: Non-Discriminatory Rollout of xDSL Services**

In its Order approving the merger between Bell Atlantic Corporation and GTE Corporation, the FCC required the corporation to comply with a number of conditions. Paragraph 15 of the merger Conditions, Non-Discriminatory Rollout of xDSL Services, requires Verizon to take several steps "to ensure that its deployment of xDSL services . . . is not discriminatory."

The first of those steps specifies that Verizon must, within 90 days of the merger closing date (i.e. by September 28, 2000), classify all of its wire centers in each state as either "urban" or "rural" wire centers. In so doing, Verizon must "consult with the relevant state commission, if the state commission chooses to engage in such consultation". Subsequent to classification, Verizon will further identify each wire center as "low income" or not. After accomplishing these preliminary steps, Verizon will be in a position to comply with the FCC's requirement that it begin reporting its xDSL deployment, by state, starting 180 days after the merger close (December 27, 2000).

I am sending this letter to inform the Florida Public Service Commission of Verizon's proposed classification for the wire centers as either urban or rural in Florida. Attached is a document that further describes Verizon's classification approach that utilizes Metropolitan Statistical Areas, an established standard with nationwide applicability. The document also provides a detailed listing of the resultant classification for each wire center in Florida. As stated above, we plan to move forward using this approach criterion by September 28<sup>th</sup>. Please let me know as soon as possible if there are any issues we need to discuss on the urban/rural classification component - otherwise I will assume that the criteria employed for the urban/rural classification is sufficient.

Should you have any question, or wish to discuss this information, please do not hesitate to call. We would appreciate receiving a stamped copy of this letter from your office to acknowledge receipt.

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Very truly yours,

*Beverly Y. Menard*  
Beverly Y. Menard

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Attachment

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Verizon DSL

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Urban/Rural Classification  
Of  
Verizon Central Offices  
In  
Florida

Version 1.0

August 1, 2000

**TABLE OF CONTENTS**

**1 OVERVIEW..... 3**

**2 CONDITIONS..... 3**

**3 CLASSIFICATION PROCESS..... 4**

    3.1 DENSITY ..... 4

    3.2 VERIZON - FLORIDA WIRE CENTER COMPOSITION..... 5

**4 WIRE CENTER DETAILS ..... 6**

**5 CONCLUSION AND NEXT STEPS..... 10**

*Figure 1: MSAs within The United States and the Verizon footprint* ..... 5

*Figure 2: Verizon - Florida Wire Center Classification* ..... 6

*Table 1: Verizon Florida Wire Center Density Classifications* ..... 6

## 1 OVERVIEW

The Federal Communications Commission (FCC) set several conditions for the deployment of xDSL services in conjunction with its approval of the merger of Bell Atlantic and GTE. These conditions are the same as those the FCC applied to the earlier merger of SBC and Ameritech. The xDSL conditions are designed to promote the "equitable and efficient deployment of Advanced Services" including xDSL. This document addresses the classification of wire centers as outlined in Section IV. Non-discriminatory Rollout of xDSL Services of the merger conditions included in CC Docket No. 98-184, Memorandum Opinion and Order (Adopted and Released June 16, 2000, "FCC Merger Order") for the Verizon footprint in the state of Florida only. Specifically it describes the process utilized in categorizing Central Offices as urban or rural.

## 2 Conditions

Below is an excerpt from the FCC's Merger Order pertaining to the conditions of the Bell Atlantic/GTE merger regarding xDSL services.

### IV. Non-discriminatory Rollout of xDSL Services

*Bell Atlantic/GTE shall take the following steps to ensure that its deployment of xDSL services (viewed on an aggregated basis and including existing deployment, without regard to the entity through which Bell Atlantic/GTE provides those services) in the Bell Atlantic/GTE Service Area is not discriminatory:*

- a. In consultation with the relevant state commission, if the state commission chooses to engage in such consultation, Bell Atlantic/GTE shall within 90 days of the Merger Closing Date reasonably classify all Bell Atlantic/GTE wire centers as either urban or rural wire centers for purposes of this Paragraph.*
- b. Bell Atlantic/GTE shall identify the 10 percent of urban wire centers within the Bell Atlantic/GTE Service Area in each Bell Atlantic/GTE State that have the greatest number of low-income households, as estimated by using the latest available census data ("Low Income Urban Pool"). After the date that is 180 days after the Merger Closing Date, by the time Bell Atlantic/GTE has deployed xDSL in at least 20 urban wire centers in a particular state, and for at least 36 months thereafter, at least 10 percent of the urban wire centers in which Bell Atlantic/GTE deploy xDSL in that state shall be wire centers from the Low Income Urban Pool.*
- c. Bell Atlantic/GTE shall identify the 10 percent of rural wire centers within the Bell Atlantic/GTE Service Area in each Bell Atlantic/GTE State that have the greatest number of low-income households, as estimated by using the latest available census data ("Low Income Rural Pool"). After the date that is 180 days after the Merger Closing Date, by the time Bell Atlantic/GTE has deployed xDSL in at least 20 rural wire centers in a particular state, and for at least 36 months thereafter, at least 10 percent of the rural wire centers in which Bell Atlantic/GTE deploys xDSL in that state shall be wire centers from the Low Income Rural Pool."*

In other words, if twenty wire centers have been deployed within a state and for 36 months thereafter, ten percent of the urban wire centers must be from the Low Income Urban Pool of wire centers, beginning 180 days after the close of the merger. The same is true for the rural wire centers.

### 3 Classification Process

The first step in determining compliance with the FCC conditions of DSL deployment is to categorize each wire center as urban or rural. This must be done in consultation with state commissions should they choose to engage in such consultations.<sup>1</sup> The sections that follow give a more detailed description of urban/rural classification process. A detailed table of all Verizon wire centers within the state of Florida follows in section 4.

#### 3.1 Density

The FCC suggested a dichotomous classification for the density of each wire center – urban or rural. Verizon proposes to use Metropolitan Statistical Areas, or MSAs, as the best method to classify wire centers. MSAs represent adjacent counties with a similar community of interest, a minimum population, and surrounding a core population nucleus. MSAs are universal across the United States and already in use by the Federal Office of Management and Budget, thereby making them the most objective of the classification methods that could be employed.

Verizon considers a wire center to be within an MSA if more than 50% of the area served by the wire center is within the MSA.

Since MSAs are, as the name implies, metropolitan areas, these are the urban areas. The Federal Office of Management and Budget has defined the MSAs for the United States.

“Metropolitan statistical area (MSA): A geographic entity, defined by the Federal OMB for use by Federal statistical agencies, based on the concept of a core area with a large population nucleus, plus adjacent communities having a high degree of economic and social integration with that core. Qualification of an MSA requires the presence of a city with 50,000 or more inhabitants, or the presence of an UA (urbanized area) and a total population of at least 100,000 (75,000 in New England). The county or counties containing the largest city and surrounding densely settled territory are central counties of the MSA. Additional outlying counties qualify to be included in the MSA by meeting certain other criteria of metropolitan character, such as a specified minimum population density or percentage of the population that is urban. MSAs in New England are defined in terms of cities and towns, following rules concerning commuting and population density. MSAs were first defined and effective June 30, 1983.”<sup>2</sup>

<sup>1</sup> Subsequent to the urban/rural classification, all the wire centers within each category will be classified by decile by the number of households with incomes less than \$15,000. To put it simply, each wire center gets classification of U or R, for urban or rural and a number from 1 to 10 for the income decile.

<sup>2</sup> <http://www.census.gov/geo/www/tiger/glossary.html>

A map of MSAs within the United States follows. The MSA boundaries are used to determine whether a central office is rural or urban.

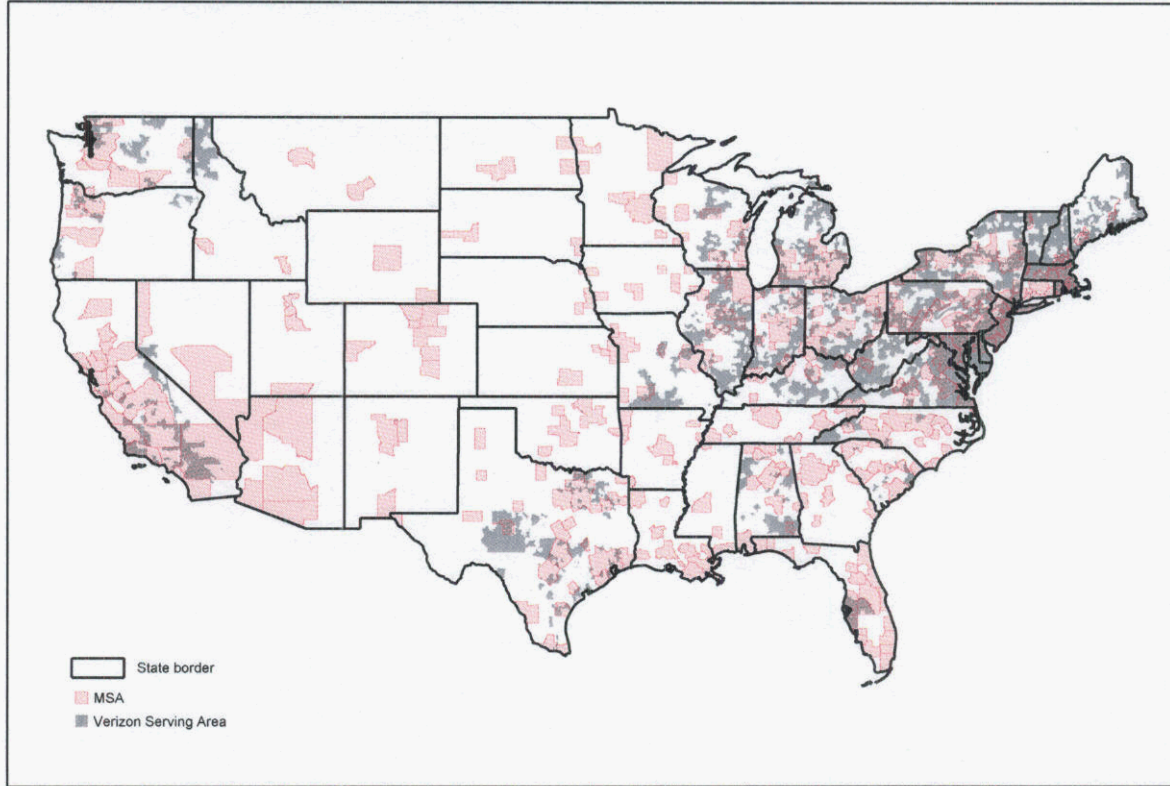
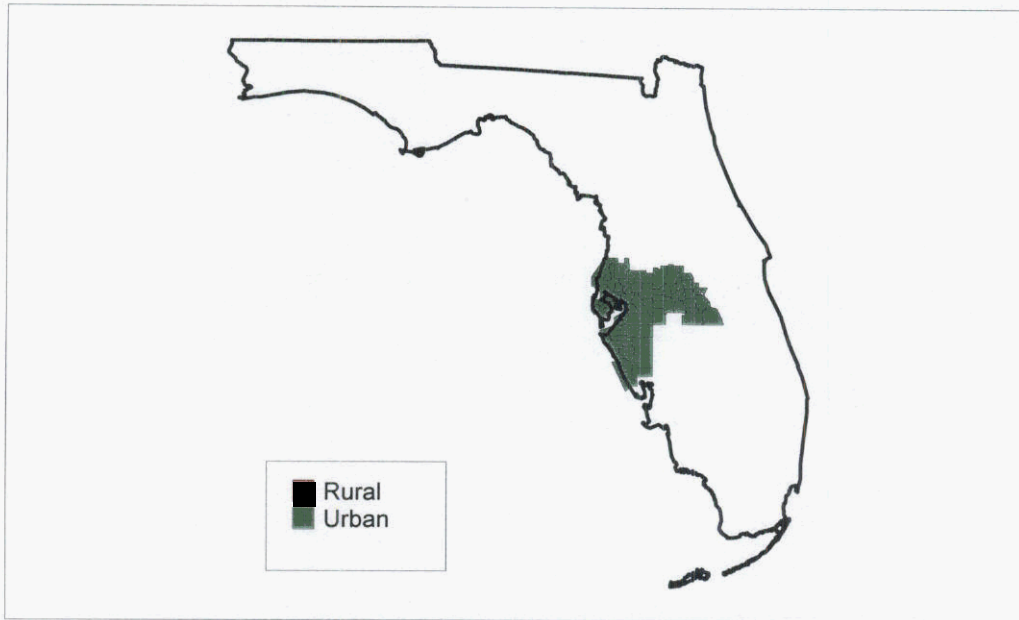


Figure 1: MSAs within the United States and the Verizon footprint

### 3.2 Verizon - Florida Wire Center Composition

The map below shows the urban/rural classification of Verizon wire centers in Florida using the methodology described above. Verizon has ninety wire centers in Florida. All of these are in MSAs and are therefore urban.

## Urban/Rural Classification of Verizon Central Offices in Florida



**Figure 2: Verizon - Florida Wire Center Classification**

### 4 Wire Center Details

Utilizing the classification method described in Section 3, each of the wire centers served by Verizon in Florida, were classified as urban or rural.

The table below shows each Verizon wire center in Florida, the urban/rural designation and the MSA. Wire centers not within an MSA, are in an RSA (Rural Statistical Area).

**Table 1: Verizon Florida Wire Center Density Classifications**

CLLI	wc_name	urban /rural	MSA/RSA code	MSA/RSA name
ABDLFLXA	AUBURNDALE	U	3980	LAKELAND-WINTER HAVEN FL
ALFAFLXA	ALAFIA	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
ALTRFLXA	ALTURAS	U	3980	LAKELAND-WINTER HAVEN FL
ANMRFLXA	BRADENTON-ANNA MARIA	U	7510	SARASOTA-BRADENTON FL
BARTFLXA	BARTOW-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
BAYUFLXA	BAYOU	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
BBPKFLXA	LAKE WALES-BABSON PARK	U	3980	LAKELAND-WINTER HAVEN FL

Urban/Rural Classification of Verizon Central Offices in Florida

CLLI	wc_name	urban/rural	MSA/RSA code	MSA/RSA name
BHPKFLXA	BEACH PARK	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
BRBAFLXA	BRADENTON-BAY	U	7510	SARASOTA-BRADENTON FL
BRJTFLXA	BRADLEY	U	3980	LAKELAND-WINTER HAVEN FL
BRNDFLXA	BRANDON	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
BRTNFLXX	BRADENTON-MAIN	U	7510	SARASOTA-BRADENTON FL
BYSHFLXA	BAYSHORE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
CLWRFLXA	CLEARWATER-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
CNSDFLXA	COUNTRYSIDE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
CRWDFLXA	CARROLLWOOD	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
CYGRFLXA	CYPRESS GARDENS	U	3980	LAKELAND-WINTER HAVEN FL
DNDNFLXA	DUNEDIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
DUNDFLXA	DUNDEE	U	3980	LAKELAND-WINTER HAVEN FL
ENWDFLXA	ENGLEWOOD	U	7510	SARASOTA-BRADENTON FL
FHSDFLXA	FEATHER SOUND	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
FRSTFLXA	FROSTPROOF-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
GNDYFLXA	GANDY	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
HDSNFLXA	HUDSON-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
HGLDFLXA	HIGHLANDS	U	3980	LAKELAND-WINTER HAVEN FL
HNCYFLXA	HAINES CITY-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
HNCYFLXN	HAINES CITY-NORTH	U	3980	LAKELAND-WINTER HAVEN FL
HYPKFLXA	HYDE PARK	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
INLKFLXA	INDIAN LAKE-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
INRKFLXX	INDIAN ROCKS	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
KYSTFLXA	KEYSTONE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
LGBKFLXA	LONGBOAT	U	7510	SARASOTA-BRADENTON FL
LKALFLXA	LAKE ALFRED	U	3980	LAKELAND-WINTER HAVEN FL
LKLDFLXA	LAKELAND-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
LKLDFLXE	LAKELAND-EAST	U	3980	LAKELAND-WINTER HAVEN FL
LKLDFLXN	LAKELAND-NORTH	U	3980	LAKELAND-WINTER HAVEN FL
LKWFLXA	LAKE WALES-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
LKWFLXE	LAKE WALES-EAST	U	3980	LAKELAND-WINTER HAVEN FL
LLMNFLXA	LEALMAN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
LNLKFLXA	LAND O'LAKES	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
LRGOFLXA	LARGO	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL



Urban/Rural Classification of Verizon Central Offices in Florida

CLLI	wc_name	urban/rural	MSA/RSA code	MSA/RSA name
LUTZFLXA	LUTZ	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
MLBYFLXA	MULBERRY-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
MNLKFLXA	HUDSON-MOON LAKE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
MYCYFLXA	MYAKKA-MAIN	U	7510	SARASOTA-BRADENTON FL
NGBHFLXA	NORTH GULF BEACH	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
NPRCFLXA	NEW PORT RICHEY	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
NRPTFLXA	NORTH PORT-MAIN	U	7510	SARASOTA-BRADENTON FL
NRSDFLXA	NORTHSIDE	U	7510	SARASOTA-BRADENTON FL
OLDSFLXA	OLDSMAR	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
OSPRFLXA	VENICE-OSPREY	U	7510	SARASOTA-BRADENTON FL
PKCYFLXA	POLK CITY-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
PLMTFLXA	PALMETTO-MAIN	U	7510	SARASOTA-BRADENTON FL
PLSLFLXA	PALMA SOLA	U	7510	SARASOTA-BRADENTON FL
PNCRFLXA	PINECREST	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
PNLSFLXA	PINELLAS	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
POINFLXA	POINCIANA	U	3980	LAKELAND-WINTER HAVEN FL
PRSHFLXA	PALMETTO-PARRISH	U	7510	SARASOTA-BRADENTON FL
PSDNFLXA	PASADENA	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
PTCYFLXA	PLANT CITY-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
RSKNFLXA	RUSKIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SARKFLXA	ST. ARMANDS KEY	U	7510	SARASOTA-BRADENTON FL
SEKYFLXA	SIESTA KEY	U	7510	SARASOTA-BRADENTON FL
SGBEFLXA	SOUTH GULF BEACH	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SKWYFLXA	SKYWAY	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SLSPLFLXA	SULPHUR SPRINGS	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SMNLFLXA	SEMINOLE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SNSPFLXA	SEVEN SPRINGS	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SPBGFLXA	ST. PETE-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SPBGFLXS	ST. PETE-SOUTH	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SPRGFLXA	SARASOTA SPRINGS	U	7510	SARASOTA-BRADENTON FL
SRSTFLXA	SARASOTA-MAIN	U	7510	SARASOTA-BRADENTON FL
SSDSFLXA	SOUTHSIDE	U	7510	SARASOTA-BRADENTON FL
STGRFLXA	ST. GEORGE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
SWTHFLXA	SWEETWATER	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL

Urban/Rural Classification of Verizon Central Offices in Florida

CLLI	wc_name	urban/rural	MSA/RSA code	MSA/RSA name
TAMPFLXE	TAMPA-EAST	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
TAMPFLXX	TAMPA-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
THNTFLXA	THONOTOSASSA	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
TMTRFLXA	TEMPLE TERRACE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
TRSPFLXA	TARPON SPRINGS-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
UNVRFLXA	UNIVERSITY	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
VENCFLXA	VENICE-MAIN	U	7510	SARASOTA-BRADENTON FL
VENCFLXS	VENICE-SOUTH	U	7510	SARASOTA-BRADENTON FL
WIMMFLXA	WIMAUMA	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
WLCHFLXA	WESLEY CHAPEL	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
WLCRFLXA	WALLCRAFT	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
WNHNFLXC	WINTER HAVEN-MAIN	U	3980	LAKELAND-WINTER HAVEN FL
WSSDFLXA	WESTSIDE	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
YBCTFLXA	YBOR	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL
ZPHYFLXA	ZEPHYRHILLS-MAIN	U	8280	TAMPA-ST PETERSBURG-CLEARWATER FL

## 5 CONCLUSION AND NEXT STEPS

In conclusion, Verizon's DSL deployment will meet all the conditions contained in the FCC's Merger Order. 180 days after the merger close, Verizon Advanced Data will report to the FCC as specified in the Merger Order as follows:

*"file a quarterly report with the Commission describing the status of its xDSL roll-out. This report shall include xDSL deployment information by Bell Atlantic/GTE state, including the number and name/location of urban and rural wire centers and low-income wire centers where Bell Atlantic/GTE has deployed xDSL. The report shall be submitted 180 days after the Merger Closing Date and on a quarterly basis thereafter."*