

BEFORE THE STATE OF FLORIDA  
PUBLIC SERVICE COMMISSION

Responses of Winstar Wireless, Inc.  
2000 ALEC Data Request

000000-PU

Florida Statute 364.02(2) defines basic local service as:

**"Basic local telecommunications service"** means voice-grade, flat-rate residential and flat-rate single line business local exchange services which provide dial tone, local usage necessary to place unlimited calls within a local exchange area, dual tone multi-frequency dialing, and access to the following: emergency services such as "911," all locally available interexchange companies, directory assistance, operator services, relay services, and an alphabetical directory listing. For a local exchange company, such terms shall include any extended area service routes, and extended calling service in existence or ordered by the commission on or before July 1, 1995.

- 1. a. Are you providing service to service to residential customers in Florida that complies with the above definition of basic local service?

**No.**

- b. To how many residential customers are you providing basic local service in Florida?

**Not applicable.**

- c. What are your current rates for providing residential basic local service?

**Not applicable.**

- d. Are you providing service to business customers in Florida that complies with the above definition of basic local service?

**Yes.**

- e. To how many business customers are you providing basic local service in Florida?

**Winstar provides basic local service to [REDACTED] business customers in Florida.**

- f. What are your current rates for providing business basic local service in Florida?

**Please see Attachment No. 1.**

- 2. Are you currently providing other forms of local service (business or residential) in Florida that may not meet Florida's statutory definition of basic local service? (Examples could include: multiline business users; services with toll or usage restrictions; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offerings; etc. (If yes, continue with question #2; if no, skip to Question #3)

**Yes.**

APP \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMP \_\_\_\_\_  
 COM \_\_\_\_\_  
 CTR \_\_\_\_\_  
 ECR \_\_\_\_\_  
 LEG \_\_\_\_\_  
 OPC \_\_\_\_\_  
 PAI \_\_\_\_\_  
 RGO \_\_\_\_\_  
 SEC   1   \_\_\_\_\_  
 SER \_\_\_\_\_  
 OTH \_\_\_\_\_

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- a. Are you currently providing other forms of local service to residential customers in Florida?

**No.**

- b. If the response to a. is affirmative, please describe the forms of local service you are providing to residential customers in Florida. (If available, please provide brochures or comparable materials.)

**Not applicable.**

- c. If the response to a. is affirmative, please indicate your current rates for each of the services indicated in response to b.

**Not applicable.**

- d. Are you currently providing other forms of local service to business customers in Florida?

**Yes.**

- e. If the response to d. is affirmative, please describe the forms of local service you are providing to business customers in Florida. (If available, please provide brochures or comparable materials.)

**Winstar provides the following "other" forms of local service to its business customers: analog trunks, digital trunks, ISDN PRI and Centrex.**

- f. If the response to d. is affirmative, please indicate your current standard rates for each of the services indicated in response to e.

**Please see Attachment No. 2.**

3. Please describe the method(s) you are using to provide telephone services, (e.g., resale, interconnection, unbundled network elements, facility-based, etc.)

**Winstar utilizes both facilities-based and resale methods of providing telephone services.**

- a. Please indicate, by exchange, the number of LEC access lines you are reselling to residential customers.

**Not applicable.**

- b. Please indicate, by exchange, the number of LEC access lines you are reselling to business customers.

**Please see Attachment No. 3.**

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- c. Please indicate, by exchange, the types of unbundled network elements, if any, you are obtaining from the incumbent LEC.

**None.**

- d. Please indicate, by exchange, the number of unbundled local loops, if any, you are obtaining from the incumbent LEC.

**None.**

- e. Please indicate the types of facilities deployed by your company in Florida to provide local telephone services, and indicate where these facilities are deployed.

**Winstar currently utilizes 5ESS switches and 38 GHz microwave radio systems deployed in Miami and Tampa for the provision of local telephone services.**

- f. If known, please indicate the number of access lines, separately for residential and business customers, provisioned solely over company-owned facilities.

**Please see Attachment No. 4.**

- g. Please indicate, by exchange, the number of business access lines you serve that are provided to internet service providers.

**Winstar does not maintain data which allows it to track lines that are provided to internet service providers.**

- h. Please indicate, by exchange, the number of business access lines you serve that are provided to voicemail service providers.

**Winstar does not maintain data which allows it to track lines that are provided to voicemail service providers.**

4. Please indicate the number and location of switches you have located in Florida, if any, used to provide services to customers in Florida.

**Winstar currently has two switches located in Florida that are used to provide services to customers in Florida. They are located at: 150 SE 2<sup>nd</sup> Avenue, Miami, FL, 33131 and 4200 W. Cypress Street, Tampa, FL, 33607.**

5. For each exchange where you are providing any form of residential local telephone service, please identify by exchange (a list of exchange is attached), the number of residential access lines served as of June 30, 2000. (See example below)

**Not applicable.**

6. For each exchange where you are providing any form of business local telephone services, please identify by exchange, the number of business access lines served as of June 30, 2000.

**Please see Attachment Nos. 3 and 4.**

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7. For billing and accounting purposes, do you differentiate between residential and business customers?

**Not applicable. Winstar does not serve residential customers.**

- a. Are you currently offering any enhanced services? If yes, what are they?

**Winstar offers the following enhanced services: voice mail, remote call forwarding and private line service.**

- b. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.

**Yes.**

- c. Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.

**No.**

- d. Do you anticipate that your long-term manner of providing service will differ from your current practice? If so, do you expect becoming a full-scale facilities-based provider?

**Yes. Winstar currently provides its facilities-based services via terrestrial and 38 GHz microwave radio facilities. Ultimately, Winstar anticipates that all services will be provided using its 38 GHz microwave radio facilities.**

- e. Have you been assigned your own NXX codes? If yes, how many codes have you been assigned and for each code, as of January 31, 2000, how many numbers have been assigned from the code?

**Please see Attachment No. 5.**

8. If you are not currently providing local telephone service in Florida:

**Not applicable.**

- a. Please explain why you are not providing local telephone service. For example, have you experienced marketing or billing difficulties? Lack of capital? Customers are not willing to try something new? Lack of expertise in telecommunications? Difficulties dealing with the LECs? Insufficient profit margin?

**Not applicable.**

- b. Do you anticipate providing local telephone service at some future date? If yes, please indicate when. (e.g., first quarter 2000)

**Not applicable.**

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- c. Please describe the most important factors that you believe are inhibiting your ability to provide local telephone service, and describe how these factors have adversely affected your entry.

**Not applicable.**

- d. Are you currently providing any other telecommunications services in Florida (i.e., other than local service)? If yes, please list the services provided.

**Not applicable.**

9. Please list your primary line of business (for example, entertainment, cable television, private line/special access service, interexchange service, local service, cellular service, paging service, electric service, municipality, etc.).

**Winstar's primary line of business is the provision of local telecommunications and broadband services to business customers.**

10. At any time during the last 12 months have you provided local telephone services in Florida and then withdrawn the service? If yes, please discuss the reasons for this decision.

**No.**

11. If you or an affiliate provides cable television in Florida, do you offer any package plans combining cable television and local telephone services? If so, please indicate where such packages are being offered.

**Not applicable.**

12. If you or an affiliate provides long distance telephone service in Florida, do you offer any package plans combining long distance and local telephone services? If so, please describe any such plans and their terms and conditions. Is subscribing to both local telephone and long distance a condition of providing service?

**Winstar provides packaged service offerings that combine local and long distance telephone services, as well as other integrated telecommunications services. Generally, customers have the option of selecting from a menu the services they require, such as integrated T-1 service, ISDN PRI, Internet access and Web hosting services.**

13. If you or an affiliate's primary business is unrelated to the provision of telecommunications, please indicate the nature of such primary business (es). Examples of such businesses could include, but are not limited to: pawn shops, title loan companies, alternative automobile financing, internet service providers, or check cashing services.

**Not applicable.**

14. Please describe any actions available to the Florida Public Service Commission which you believe should be taken to foster local exchange competitive market entry.

**Section 271 Checklist.** Once BellSouth files a Section 271 application to provide long distance service in Florida, the Commission should rigorously scrutinize BellSouth's past record and ongoing performance in judging whether or not BellSouth has complied with the 14-item statutory checklist that is a prerequisite to obtaining Section 271 approval from the Commission. Winstar applauds the Commission's on-going review of BellSouth's OSS systems, and urges the Commission to continue to review all facets of BellSouth's provisioning and relationship with its competitors.

**ILEC Resources Devoted to Interconnection.** The Commission should ensure that ILECs do not divert resources from establishing and maintaining interconnection relationships with its local competitors to pursue unregulated lines of business. An ILEC must not be permitted to excuse either poor provisioning in interconnection or the failure to perform repairs in a timely manner with claims of insufficient resources.

**Regulation and Reporting Requirements.** Because of their current market dominance and former position as a regulated monopoly, the Commission should maintain the various regulatory and reporting requirements for the ILECs until local competition in Florida is much more mature. At the same time, however, because ALECs do not anywhere approach the ILEC's market position and have much different cost structures - currently and historically -, ALECs should not be subject to extensive regulatory and reporting requirements.

**Collocation of Microwave Equipment.** The Commission should compel the ILEC to file a tariff governing the collocation of ALEC microwave transmission equipment on ILEC premises for the purpose of interconnection or gaining access to UNEs, including a rooftop unit, an inside electronic unit, and the riser cable necessary to connect the two units. Tariff treatment of the collocation of microwave equipment would ensure uniform availability and ease of implementation.

**Numbering.** The Commission should delay the implementation of number pooling in Florida until the national pooling model is in place and the FCC has selected the national pooling administrator. It is difficult for carriers with a nationwide presence to accommodate pooling implementation models that vary by state. The Commission should be lenient when carriers make legitimate requests for extensions of time to put NXX codes in service, especially when delays are caused by factors beyond the carriers' control.

15. Please describe any actions which you may believe should be taken by the Florida Legislature that would foster local exchange competitive market entry.

**Access to Buildings.** The legislature should adopt legislation that enables ALECs to access multi-tenant buildings on equal terms and conditions as the ILEC. It is essential to the growth of competition that landlords and building owners be prohibited from extracting excessive rents or imposing revenue-sharing arrangements on ALECs that seek to provide service to tenants located inside a multi-tenant building. Further, landlords and building owners also should not be permitted to impose an exclusive telecommunications provider on their tenants.

**Necessity of Continued Regulatory Oversight.** The legislature should be wary of any proposals - whether currently pending or introduced in the future - to rollback the various regulations with which the ILECs must comply in order to promote local competition in Florida. As long as ILECs have such a significant market dominance in their respective areas, regulatory oversight and its associated requirements are necessary to ensure that local competition can take root and be maintained.

16. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles.

**ILEC Performance Data.** Commission should evaluate ILEC performance data concerning on-time firm order commitments, provisioning intervals for trunking, provisioning intervals for special access circuits, outage responses (duration of outage and sufficiency of response), and blockages of traffic.

**Numbering.** The Commission should ensure that number conservation measures, such as number pooling, do not take the place of timely area code relief. The Commission should also consider rate center consolidation as an effective, competitively neutral method of number conservation.

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**Attachment No. 1**

**Winstar Wireless, Inc. Rates for Facilities-Based and  
Resold Basic Local Service**



## Winstar Facilities-Based Basic Local Service Rates

### Flat Rate Basic Line

Winstar's flat-rated Basic Line service provides unlimited Home Region calling (does not include Extended Calling Service calls). Monthly rates vary, depending on term commitment. There is a one-time install charge and a monthly recurring charge per line. A monthly recurring End User Common Line (EUCL) charge and Local Number Portability (LNP) charge is also applied per line and is the same regardless of term.

<b>Flat-rated Service</b>	<b>One-time Charge</b>	<b>Monthly Charge</b>
Basic Line, 1 Year	\$20.00	\$24.00
Basic Line, 2 Year	\$20.00	\$22.00
Basic Line, 3 Year	\$20.00	\$21.00

### **Message Basic Line**

Winstar's Message Basic Line service customers are charged for Home Region calls in full one-minute increments. There is a one-time install charge and a monthly recurring charge per line. A monthly recurring End User Common Line (EUCL) charge and Local Number Portability (LNP) charge is also applied per line. While Message Basic Line rates do not vary according to term, the per minute Home Region calling rates, which are also shown below, do.

<b>Message Basic Line Service</b>	<b>One-time Charge</b>	<b>Monthly Charge</b>
Basic Line	\$20.00	\$16.00

<b>Message Service Home Region Calling Rates</b>	<b>Home Region Per-Call Charge</b>
1 Year Term Agreement	\$ 0.0800
2 Year Term Agreement	\$ 0.0750
3 Year Term Agreement	\$ 0.0700

Home Region charges are on a per-call basis, regardless of the call duration.

**Winstar Rates for Basic Local Services Using Resold Facilities**

**Resold Flat Rate Basic Line**

Resold Flat Rate Basic Line service includes unlimited Home Region calling. There is a one-time install charge and a monthly recurring charge per line. A monthly recurring End User Common Line (EUCL) charge, Local Number Portability (LNP) and hunting charge is also applied per line.

<b>Flat Rate Service</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
Basic Line	\$31.50	\$28.33

**Resold Message Rate Basic Line**

Resold Message Rate Basic Line will customers are charged for Home Region calls on a per call basis. There is a one-time install charge and a monthly recurring charge per line in addition to the monthly recurring End User Common Line (EUCL) and hunting charge that must be applied per line.

<b>Message Rate Service</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
Basic Line	\$31.50	\$16.00

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**Attachment No. 2**

**Winstar Wireless, Inc. Rates for Facilities-Based and  
Resold "Other" Local Services**

**Winstar Facilities-Based "Other" Local Service Rates**

**Flat Rate Analog Trunks**

The monthly trunk charge includes unlimited Home Region calling. There is a one-time install charge and a monthly recurring charge per trunk. Monthly charges vary according to term. A monthly recurring End User Common Line (EUCL) charge and Local Number Portability (LNP) charge is also applied per line and is the same regardless of term.

<b>Per In, Out, or Two-Way Trunk</b>	<b>One-time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	\$20.00	\$ 42.00
2 Year Term Agreement	\$20.00	\$ 39.00
3 Year Term Agreement	\$20.00	\$ 36.00

<b>Per In with DID Trunk</b>	<b>One-time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	\$45.00	\$ 42.00
2 Year Term Agreement	\$45.00	\$ 39.00
3 Year Term Agreement	\$45.00	\$ 36.00
EUCL Charge, per trunk	N/A	\$8.96
LNP Charge, per trunk	N/A	\$1.80

<b>Per Two-Way with DID Trunk</b>	<b>One-time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	\$45.00	\$ 42.00
2 Year Term Agreement	\$45.00	\$ 39.00
3 Year Term Agreement	\$45.00	\$ 36.00
EUCL Charge, per trunk	N/A	\$8.96
LNP Charge, per trunk	N/A	\$1.80

**Message Rate Analog Trunks**

Customers that choose the Message Rate Analog trunks will be charged for Home Region calls in full one-minute increments.

	<b>One-time Charge</b>	<b>Monthly Charge</b>
Per In, Out, or Two-Way Trunk	\$20.00	\$ 28.00
Per In with DID Trunk	\$45.00	\$ 28.00
Per Two-Way with DID Trunk	\$45.00	\$ 28.00

**Message Service Home Region Calling Rates**

1 Year Term Agreement  
2 Year Term Agreement  
3 Year Term Agreement

**Home Region Per-Call Charge**

\$ 0.0800  
\$ 0.0750  
\$ 0.0700

**Winstar Facilities-Based "Other" Local Service Rates**

**DID Number Charges**

Any Flat or Message access customer with direct inward dialing requirements must purchase DID numbers.

	<b>One-time Charge</b>	<b>Monthly Charge</b>
Each group of 20 DID Numbers	\$20.00	\$20.00

Maximum of 300 DID numbers per 24 trunks.  
Maximum of 1,200 DID numbers per customer.

**Winstar Facilities-Based "Other" Local Service Rates**

**Digital Trunk Charges**

Customers must pay a one-time and monthly charge in addition to a Local Number Portability (LNP) charge for any combination of In, Out, Two-Way, In with DID, or Two-Way with DID trunks, up to a total of 24 trunks. In addition, customers pay per group of DID numbers, but there are no additional charges for DID trunks.

<b>12 Digital Trunks</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	\$500.00	\$438.75
2 Year Term Agreement	\$500.00	\$422.50
3 Year Term Agreement	\$500.00	\$406.25

<b>1 Digital Trunk</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	N/A	\$19.69
2 Year Term Agreement	N/A	\$18.96
3 Year Term Agreement	N/A	\$18.23

<b>Full T1 – 24 Digital Trunks</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	\$500.00	\$675.00
2 Year Term Agreement	\$500.00	\$650.00
3 Year Term Agreement	\$500.00	\$625.00

**DID Number Charges**

Any access customer with direct inward dialing requirements must purchase DID numbers. They can be purchased in the increments below.

	<b>One-Time Charge</b>	<b>Monthly Charge</b>
Group of 20 DID Numbers	\$20.00	\$20.00
Maximum 300 DID numbers per 24 trunks		
Maximum 1,200 DID numbers per customer		

**ISDN/PRI**

<b>23B+D, 24B, or 23B + Backup D</b>	<b>One-time Charge</b>	<b>Monthly Charge</b>
1 Year Term Agreement	\$500.00	\$990.00
2 Year Term Agreement	\$500.00	\$930.00
3 Year Term Agreement	\$500.00	\$865.00
LNP Charge	N/A	\$34.56

## Winstar Rates for "Other" Local Services Using Resold Facilities

### Flat Rate Analog Trunks

There is a one-time install charge and a monthly recurring charge per trunk. A monthly recurring EUCL and hunting charge is also applied per trunk. Customers who want direct inward dialing (DID) must also pay for DID numbers.

<b>Flat Rate Analog Trunks</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
In, Out, Two-way Trunk	\$31.50	\$47.00
In and Two-way with DID Trunk	\$31.50	\$47.00

### Message Rate Analog Trunks

Customers that choose the Message Rate Analog Trunks are charged for Home Region calls on a per call basis.

<b>Message Rate Analog Trunks</b>	<b>One-Time Charge</b>	<b>Monthly Charge</b>
In, Out, Two-way Trunk	\$31.50	\$28.00
In and Two-way with DID Trunk	\$31.50	\$28.00
EUCL Charge, per Trunk	N/A	\$8.96
LNP Charge, per Trunk	N/A	\$3.24

### **DID Number Charges**

Analog trunk customers with direct inward dialing requirements must purchase DID numbers. They can be purchased in the increments below.

	<b>One-Time Charge</b>	<b>Monthly Charge</b>
First Group of 20 DID Numbers	\$495.00	\$90.00
Each Additional Group of 20 DID Numbers	\$18.00	\$90.00

Maximum of 300 DID numbers per 24 trunks  
Maximum of 1,200 DID numbers per customer

**Attachment No. 3**

**LEC Access Lines Resold to Business Customers**





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Resale Local Lines by City* (Inception thru 6/30/00):				
City	Business Lines	Centrex Lines	Trunks	Total City
[REDACTED]				

\* NOTE: Winstar does not track line data by exchange.

**Attachment No. 4**

**Access Lines Provisioned Over Winstar Wireless, Inc. Facilities**

Network Local Lines by City* (Inception thru 6/30/00):						
City	Business Lines	Centrex Lines	Integrated T-1	ISDN/PRI	Trunks	Total (City)
[REDACTED]						

\* NOTE: Winstar does not track line data by exchange.

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**Attachment No. 5**

**NXX Code Assignments**

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NPA/NXX	Exchange	Assignments
[REDACTED]		