

Florida Public Service Commission 2000 ALEC Data Request

Response of Comm South Companies, Inc.

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**?

Comm South Companies, Inc. ("CSC") does not provide "basic local telecommunications service," as defined by statute, to residential customers in Florida.

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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)

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

CSC provides *prepaid* basic local service to residential customers in Florida.

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

CSC's prepaid basic local service offered to residential customers in Florida is similar to "basic local telecommunications service" with the exception that CSC, with the customer's knowledge and permission, blocks directory assistance, operator services, and all other usage-based services.

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

CSC's current rate for the service offered is \$40.50/month (plus taxes, surcharges, and fees as imposed by jurisdiction).

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

CSC does not provide service to business customers.

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

N/A

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

N/A

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

CSC provides prepaid local exchange services through the resale of facilities provided by other local exchange carriers.

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

See attached Exhibit 1.

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

N/A

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

N/A

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

N/A

- 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.

N/A

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

N/A

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

N/A

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

N/A

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

CSC does not own or operate switches located in the State of Florida.

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

See attached Exhibit 1.

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. (See example below)

N/A

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

N/A

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

CSC currently offers call forwarding, call return, call waiting, caller ID, speed dial, and three-way calling in conjunction with its prepaid local phone service.. CSC does not, however, offer xDSL, voice mail, or other services.

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

CSC has not experienced any significant barriers in entering Florida's local exchange markets.

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

The only significant difficulties CSC has encountered with agreements with incumbent LEC's involve certain ongoing disputes with BellSouth over the availability of OSS facilities and the impact that has had on volume and term discount provisions.

- e. 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?

CSC expects to continue as a provider of prepaid phone services. CSC may eventually expand its service offerings to include interexchange, facilities-based, business, broadband, and/or other telecommunications services.

- f. 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?

CSC has not been assigned its own NXX codes.

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

- 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?

N/A

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

N/A

- 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.

N/A

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

N/A

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.).

CSC's primary line of business is the provision of prepaid residential local phone service.

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.

N/A

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?

CSC does not currently provide long distance telephone service in Florida but is considering doing so in the near future. At that time, CSC will inform the Commission regarding any packaged local and long distance plans it may offer.

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.

N/A

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.

CSC does not have any suggestions at this time.

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

CSC does not have any suggestions at this time.

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.

CSC does not have any comments or suggestions at this time.

Exhibit 1 - Resold Residential Access Lines

NPA	NXX	Count
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NPA	NXX	Count
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NPA	NXX	Count
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NPA	NXX	Count
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