

10/23-6-07 (entire document)
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Verizon Florida Inc.'s Responses to Staff's
Amended First Set of Interrogatories (Nos. 1-99)
Docket No. 990649B-TP
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territory. This information does not, however, include lines lost due to bypass and other technologies (e.g., wireless, cable, etc.), which are significant.

The following information is confidential.

<u>Line Type</u>	<u>Dec-00</u>
Resale Lines	23,319
Unbundled Loops	5,757
Unbundled Platforms	0

2. How many residential lines have ALECs captured in Verizon's exchanges in Florida?

Response

Verizon cannot answer this question, as only the ALECs know how many lines they have captured in Verizon's exchanges. Below, Verizon is only able to provide information on number of resold lines, unbundled loops and platforms in its territory. This information does not, however, include lines lost due to bypass and other technologies (e.g., wireless, cable, etc.), which are significant.

The following information is confidential.

<u>Line Type</u>	<u>Dec-00</u>
Resale Lines	72,348
Unbundled Loops	211
Unbundled Platforms	0

3. Explain in detail how Verizon factored into its proposed economic lives the threat of bypass by emerging technologies such as wireless local loop technologies.

Response

As explained in the testimony of Verizon witness Sovereign, Verizon considers competitive risk, as well as technological developments, in determining depreciation inputs. Bypass, whether by wireless local loop, cable technology, or competitors' fiber and/or switches must all be considered when determining depreciation inputs. Mr. Sovereign lists ample evidence of competition for Verizon Florida in his direct testimony.

This confidentiality request was filed by or for a "telco" for DN 14145-01. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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Broadband and Cox already offer local telephone service over its cable television lines in some parts of the country. Cable modems from competitors such as AT&T Broadband, Time Warner, and Cox offer direct competition to Verizon's DSL services.

11. When does Verizon plan to no longer add any metallic cable plant in Florida?

Response

There are no plans to stop the deployment of metallic cable plant installations in Florida.

12. Please provide a percentage breakdown as of 1/1/2000 of the metallic cable facilities between interoffice, feeder, and distribution. The response should also include a detailed explanation as to how this percentage breakdown was determined.

Response

The following information is confidential.

A. Percentage figures:

• IOF	Metallic	0.00 %
• Feeder	Metallic	8.12 %
• Distribution	Metallic	83.02 %
• IOF	Fiber	5.94 %
• Feeder	Fiber	2.92 %
• Distribution	Fiber	0.00 %
• Total:		100.00 %

B. Explanation of how percentage breakdown was determined:

1. A special study was conducted to identify metallic footage feeder and distribution in service on 1/1/2000. The source of this data was the ICGS Data Base.

- Metallic IOF facilities in Verizon Florida is zero. (i.e., Verizon Florida Region IOF is served completely by fiber optic systems.)

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2. A special study was conducted to identify the footage of Fiber Optic Cable which was in service on 1/1/2000. The source of this data was the ICGS Data Base.

3. Available fiber optic data does not differentiate between IOF, Feeder, and Distribution. This information was developed based on a three-year average of the major Program Category (PCAT) codes associated with work orders:

- IOF (GX03) 67 % of fiber
- Feeder (GH00) 14 % of fiber
- Access (GH23) 19 % of fiber

By multiplying the Total Fiber Optic Footage from ICGS by these percentage figures, the footage associated with these categories was developed. Access is fiber optical cable associated customer broadband services (i.e., DS-3 and above.) For purpose of this analysis Access was included in feeder numbers. Distribution is essentially zero since it there is only a single Fiber to the Curb system in Florida. This system is located in the Hyde Park Central Office.

4. From the footages, relative percentages were developed.

13. Please list the services that cannot be provided over copper facilities.

Response

Typically, DS3 (44.7Mb/s) and above services cannot be provided over copper. In addition, SONET type services cannot be provided over copper. But, there are other loop parameters (length, /gauge, etc.) that may require conditioning or repeaters to be installed to provide lower services (1.5Mb/s for example).

14. What are Verizon's plans for deploying ADSL or HDSL technologies?

Response

Verizon Florida objects to this interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. Verizon Florida further objects to this interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements and is not otherwise relevant to any issue in this proceeding.

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Notwithstanding the above objection, Verizon Florida responds as follows:

The following information is confidential.

ADSL Strategy: Verizon's data affiliate, Verizon Advanced Data, Inc (VADI) has been deploying ADSL via DSLAMs primarily located in Central Offices. Verizon Florida Inc. has only recently been granted authorization by the FCC to deploy ADSL. Plans are underway to reintegrate the ADSL operation into Verizon Florida Inc.

HDSL Strategy: Current plans for deployment are based mostly on customer demand. Fiber should be utilized in high demand areas, whereas copper should be utilized in lower demand locations.

15. What are Verizon's plans for deploying SONET?

Response

Verizon Florida objects to this interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. Verizon Florida further objects to this interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements and is not otherwise relevant to any issue in this proceeding.

Notwithstanding the above objection, Verizon Florida responds as follows:

The following information is confidential.

Verizon is committed to deploying SONET systems in the network working towards 100% SONET deployment. SONET equipment is deployed where feasible when relief is needed.

16. How does Verizon determine when a feeder or distribution transmission facility needs to be replaced?

Response

Verizon replaces these facilities when the facilities cause excessive troubles and when an approved business case supports this replacement.

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Verizon is currently exploring the application of Voice Telephony over ATM (VToA) switching in Florida in a First Office Application (FOA) in Tampa. The FOA involves use of the VToA application in a Tandem switching arrangement. No other plans have been documented to utilize ATM for voice switching applications in Florida.

21. What is Verizon's current deployment strategy for fiber cable in the feeder, interoffice, and distribution portions of the network?

Response

Verizon objects to this interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. Verizon further objects to this interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements and is not otherwise relevant to any issue in this proceeding.

Notwithstanding the above objection, Verizon Florida responds as follows:

The following information is confidential.

Feeder deployment: fiber fed pair gain systems where most economically feasible.

Interoffice: 100% of all interoffice facilities which are added are fiber.

Distribution: High bandwidth customers receive fiber optic cables.

22. (a) Provide an exhaustive list of all competitors Verizon benchmarked its asset lives against.
- (b) Of the competitors Verizon used for benchmarking purposes, identify those who are currently involved in bankruptcy proceedings.

Response

- (a) All competitors used as benchmarks are identified in the direct testimony of Verizon witness Sovereign.
- (b) Mr. Sovereign has not completed an exhaustive survey on the financial status of the benchmarked competitors, although he is aware that both NorthPoint and Rhythms are involved in bankruptcy. Verizon notes that regardless of the financial status of a specific competitor, the competitor's assets have value

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The SS7 module contains investment for STP locations in Virginia, Indiana, and California. Verizon utilized each of these state's material loadings when developing investment for SS7 as these loadings are more representative of cost at these locales. See also the responses to Interrogatory Number 31 (d).

54. What portion of the feeder portion of the Verizon Florida network is currently fiber?

Response

The following information is confidential.

26.4% of the feeder portion of the Verizon Florida network was on fiber as of 1/1/2000.

55. What portion of the distribution portion of the Verizon Florida network is currently fiber?

Response

The following information is confidential.

Essentially 0% of the distribution portion of the Verizon Florida network is on fiber. See the response to question 12.

56. Does Verizon track or maintain data on the number of customers and the amount of revenue it has lost due to increased competition in Florida as a result of the passage of the Telecommunications Act of 1996? If so, how many customer and how much revenue did Verizon lose in the period 1996-2000?

Response

It would be impossible for Verizon to accurately track such information. For instance, Verizon does not know how many customers it would have gained, but didn't, because of competition. It also doesn't know the amount of revenue it could have received from any given customer lost to a competitor. As explained above, Verizon does maintain information on the number of resold lines, UNE loops and UNE-Ps; however, this data is reported on a line basis, not by customer, and represents only a fraction of the total lost lines since it does not include the number of lines lost due to network bypass and substitute technologies such as wireless and cable.

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density grids, the road feet adjustment factor is not applied. The plant mix inputs affect the placement costs of the cable as well as the quantity of poles, pull boxes, manholes and conduit placed.

65. Is the network protected in Verizon's cost model a packet switched network or a circuit switch-based network?

Response

ICM models a circuit switched network for voice services.

66. Identify all existing remotes and concentrators by exchange in Florida.

Response

Verizon Florida has undertaken a special study to compile the current list of remotes and concentrators in the Florida service area.

The following information is Company confidential.

The list of Central Office remotes, which currently operate as remote switches is:

Alturas	Lake Wales East
Babson Park	Mulberry
Bradley Junction	Polk City
Bayshore	Poinciana
Haines City North	Parrish
Indian Lake	St. Armands Key

The current list of concentrators by exchange is as follows.

Exchange	Concentrators
Alafia	22
Alturas	6
Auburndale	13
Babson Park	6
Bartow	12
Bayou	17
Bayshore	1

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Beach Park	17
Bradenton Bay	12
Bradenton Main	10
Bradley Junction	7
Brandon	53
Carrollwood	21
Clearwater	8
Countryside	11
Cypress Gardens	12
Dundee	12
Dunedin	2
Englewood	12
Feathersound	8
Frostproof	16
Gandy	5
Haines City	27
Haines City – North	15
Highlands	19
Hudson	10
Hyde Park	9
Indian Lakes	8
Indian Rocks	8
Keystone	11
Lake Alfred	6
Lake Wales	18
Lake Wales East	10
Lakeland East	11
Lakeland Main	15
Lakeland North	29
Land O' Lake	12
Largo	8
Lealman	20
Longboat	3
Lutz	13
Moon Lake	8
Mulberry	3
Myakka City	16
New Port Richey	10
North Gulf	25
North Port	24
Oldsmar	22
Osprey	4

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Palmetto	8
Palma Sola	7
Parrish	12
Pasadena	5
Pinecrest	7
Pinellas	29
Plant City	33
Polk City	18
Ruskin	7
Sarasota Main	5
Sarasota Northside	13
Sarasota Southside	21
Sarasota Springs	16
Seminole	5
Seven Springs	11
Siesta Key	2
Skyway	5
South Gulf Beach	3
St. George	15
St. Petersburg Main	8
St. Petersburg South	2
Sulphur Springs	20
Sweetwater	19
Tampa East	28
Tampa Main	3
Tampa Westside	13
Tarpon Springs	15
Temple Terrace	12
Thonotosassa	15
University	19
Venice Main	5
Venice South	7
Wallcraft	7
Wesley Chapel	19
Wimauma	21
Winter Haven	27
Ybor	12
Zephyrhills	28

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67. Identify all remotes and concentrators by exchange projected in the network in Verizon's cost model.

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Response

The following information is Company confidential.

The remote switches are the following wire centers:

<u>CLLI</u>	<u>NAME</u>	<u>Switch Type</u>
ALTRFLXARSA	Alturas	REM GTD-5
BBPKFLXARSA	Babson Park	REM GTD-5
BRJTFLXARSA	Bradley	REM GTD-5
BYSHFLXA84H	Bayshore/	REM GTD-5
HNCYFLXN424	Haines City North	REM GTD-5
INLKFLXARSA	Indian Lake	REM GTD-5
LKWLFLXERSA	Lake Wales East	REM GTD-5
MLBYFLXARSA	Mulberry	REM GTD-5
PKCYFLXARSA	Polk City	REM GTD-5
POINFLXARSA	Poinciana	REM GTD-5
PRSHFLXARSA	Parrish	REM GTD-5
SARKFLXARSA	St. Armands Key	REM GTD-5

ICM-FL models DLCs in each wire center as shown below:

<u>CLLI</u>	<u>NAME</u>	<u>Number of DLCs</u>
ABDFLXA96H	AUBURNDALE 1	10
ALFAFLXA67H	ALAFIA 1	15
ALTRFLXARSA	ALTURAS 1	5
BARTFLXA53H	BARTOW	11
BAYUFLXA54H	BAYOU 1	16
BBPKFLXARSA	BABSON PARK 1	3
BHPKFLXA28H	BEACH PARK	4
BRBAFLXA75H	BRADENTON BAY 1	13
BRJTFLXARSA	BRADLEY 1	6
BRNDFLXA68H	BRANDON	50
BRTNFLXX74H	BRADENTON MAIN 1	13
BYSHFLXA84H	BAYSHORE 1	1
CLWRFLXA44H	CLEARWATER 1	21
CNSDFLXA79H	COUNTRYSIDE 1	23
CRWDFLXA96H	CARROLLWOOD 1	33
CYGRFLXA32H	CYPRESS GARDENS 1	10
DNDNFLXA73H	DUNEDIN 1	11
DUNDFLXA43H	DUNDEE 1	12

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ENWDFLXA47H	ENGLEWOOD 1	9
FHSDFLXA57H	FEATHERSOUND	6
FRSTFLXA63H	FROSTPROOF 1	11
GNDYFLXA57H	GANDY 1	9
HDSNFLXA86H	HUDSON 1	19
HGLDFLXA64H	HIGHLANDS 1	16
HNCYFLXA42H	HAINES CITY MAIN 1	10
HNCYFLXN424	HAINES CITY NORTH 1	5
HYPKFLXADS0	HYDE PARK	6
INLKFLXARSA	INDIAN LAKE 1	4
INRKFLXX59H	INDIAN ROCKS 1	10
KYSTFLXA92H	KEYSTONE 1	9
LGBKFLXA38H	LONGBOAT KEY 1	5
LKALFLXA95H	LAKE ALFRED 1	5
LKLDLXA68H	LAKELAND MAIN	20
LKLDLXE66H	LAKELAND EAST	13
LKLDLXN85H	LAKELAND NORTH	19
LKWLFLXA67H	LAKE WALES MAIN 1	7
LKWLFLXERSA	LAKE WALES EAST 1	8
LLMNFLXADS0	LEALMAN	20
LNLKFLXA99H	LAND O LAKES	8
LRGOFLXA58H	LARGO	7
LUTZFLXA94H	LUTZ 1	10
MLBYFLXARSA	MULBERRY 1	6
MNLKFLXA85H	MOON LAKE 1	5
MYCYFLXA32H	MYAKKA 1	11
NGBHFLXA39H	NORTH GULF BEACH 1	23
NPRCFLXA84H	NEW PORT RICHEY 1	21
NRPTFLXA42H	NORTH PORT 1	20
NRSDFLXA35H	SARASOTA NORTHSIDE 1	12
OLDSFLXA85H	OLDSMAR 1	14
OSPRFLXA96H	OSPREY 1	6
PKCYFLXARSA	POLK CITY 1	10
PLMTFLXA72H	PALMETTO 1	12
PLSLFLXA79H	PALMA SOLA 1	8
PNCRFLXA73J	PINECREST 1	5
PNLSFLXA53H	PINELLAS 1	23
POINFLXARSA	POINCIANA 1	1
PRSHFLXARSA	PARRISH 1	8
PSDNFLXA34H	PASADENA 1	12
PTCYFLXA75H	PLANT CITY	12
RSKNFLXA64H	RUSKIN 1	9

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SEKYFLXA34H	SIESTA KEY 1	2
SGBEFLXA36H	SOUTH GULF BEACH 1	6
SKWYFLXADS0	SKYWAY	11
SLSPFLXA93H	SULPHUR SPRINGS 1	16
SMNLFLXA23H	SEMINOLE	6
SNSPFLXA37H	SEVEN SPRINGS	8
SPBGFLXA89H	ST. PETERSBURG MAIN 1	11
SPBGFLXS86H	ST. PETERSBURG SOUTH 1	2
SPRGFLXA37H	SARASOTA SPRINGS 1	8
SRSTFLXA95H	SARASOTA MAIN 1	15
SSDSFLXA92H	SARASOTA SOUTHSIDE 1	21
STGRFLXA78H	ST. GEORGE 1	26
SWTHFLXA88H	SWEETWATER 1	16
TAMPFLXEDS0	TAMPA EAST	24
TAMPFLXX22H	TAMPA MAIN 1	3
THNTFLXADS0	THONOTOSASSA	8
TMTRFLXADS0	TEMPLE TERRACE	12
TRSPFLXA93H	TARPON SPRINGS 1	21
UNVRFLXA97H	UNIVERSITY	15
VENCFLXA48H	VENICE MAIN 1	9
VENCFLXSDS0	VENICE SOUTH	11
WIMMFLXA63H	WIMAUMA 1	10
WLCHFLXA97H	WESLEY CHAPEL 1	14
WLCRFLXA83H	WALLCRAFT	17
WNHNFLXC29H	WINTER HAVEN	11
WSSDFLXA87H	TAMPA WESTSIDE 1	15
YBCTFLXA24H	YBOR	5
ZPHYFLXA78H	ZEPHYRHILLS 1	15

68. Discuss the capacity considerations of SONET rings.

Response

SONET rings are sized to accommodate the total interoffice traffic offered, both switched and non-switched.

69. Explain how the model would be modified if additional parties were to add to a structure. For example, if an additional party added cable to a pole how would the new structure sharing rates be determined.

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