

2002 Alternative Local Exchange Carrier (ALEC) Data Request

Legal Company Name: ITC^DeltaCom Communications, Inc. *undocketed*  
D/B/A: ITC^DeltaCom  
FPSC company code (e.g., TX000): TX056  
Contact name and title: Nanette S. Edwards, Dir. of Regulatory Advocacy and Sr. Attorney  
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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 service routes, and extended calling service in existence or ordered by the commission on or before July 1, 1995.

1. Are you currently providing residential or business service to customers in Florida that complies with the above definition of basic local service? **Yes.**
  - a. To how many residential customers are you providing basic local service in Florida and what are your current rates?

**This Question 1a (Exhibit "A") is filed with a request for "Confidential and Proprietary" Treatment.**

**Current Rates: BellSouth regions – \$11.00  
Verizon regions – \$11.81  
Sprint regions – not available**

- b. To how many business customers are you providing basic local service in Florida and what are your current rates?

**This Question 1b (Exhibit "B") is filed with a request for "Confidential and Proprietary" Treatment.**

**Current Rates: Rate Center priced, BellSouth regions – \$25.95-36.95  
Rate Center priced, Verizon regions – \$24.34-40.92  
Rate Center priced, Sprint regions – \$15.47-36.81**

2. Are you currently providing types of local service (business or residential) in Florida that may not meet Florida's statutory definition of basic local service? (Examples could include: multi-

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line business users; services with toll restrictions or usage; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offerings; etc.) **Yes.**

- a. Please describe each of the forms of local service you are providing to residential customers in Florida, where you are offering these services (e.g., in which cities or areas), and indicate your current rates.

**INFINITY (Resale of ILEC basic residential local line/IFR) – see response to Question 1a above for rates; available in BellSouth and Verizon territories. ITC^DeltaCom is not currently providing other forms of local service to residential customers in Florida.**

- b. Please describe each of the forms of local service you are providing to business customers in Florida, where you are offering these services (e.g., in which cities or areas), and indicate your current rates.

**INFINITY (Resale of basic business local line/IFB) – see response to Question 1b above for rates; available in BellSouth, Verizon and Sprint territories. SELECT 100 – Delivered via UNE-P; provided at Infinity rates with discount; available to customers with 2 or more business lines in BellSouth territories.**

**DUNE (Digital Lines), UNITY and UNITY PLUS (Digital Trunks) – Delivered via a DS-1 facility. Please refer to ITC^DeltaCom's Florida Local Price List for corresponding rates. The attached service area maps for facilities-based products (Exhibit "C") are filed with a request for "Confidential and Proprietary" Treatment.**

3. Do you actively market your local services to Florida residential customers? **No.**

- a. If not, please explain why. **BellSouth, Verizon and Sprint UNE rates are too high and we are unable to compete.**
- b. If so, in what geographic areas?
- c. If so, what types of marketing do you use? Please check all that are applicable.

- Newspaper
- Radio
- TV
- Direct Mail
- Telemarketing
- Email
- Website
- Other (please specify)

4. Does your company offer xDSL? If so, please indicate, by exchange, the number of xDSL lines your company provides and explain how your company's various service offerings are priced. **No.**

5. Are you offering or providing voice over DSL (VoDSL) service? If so, in what exchanges and respective wire centers and at what price(s)? Is your service local, long distance, or both?  
**No.**

6. Please describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.). **We provide service via resale, via interconnection (physical collocation) and use of unbundled network elements, and dedicated access (T-1).**

- a. Please indicate, by exchange and respective wire center, the number of incumbent local exchange carrier (ILEC) access lines you are reselling to residential customers. **This Question 6a (Exhibit "D") is filed with a request for "Confidential and Proprietary" Treatment.**
- b. Please indicate, by exchange and respective wire center, the number of incumbent local exchange carrier (ILEC) access lines you are reselling to business customers. **This Question 6b (Exhibit "E") is filed with a request for "Confidential and Proprietary" Treatment.**
- c. Please indicate, by exchange and respective wire center, the types of unbundled network elements, if any, you are obtaining from the incumbent ILEC. **This information is not available by exchange. ITC^DeltaCom primarily purchases unbundled loops. ITC^DeltaCom does not purchase unbundled OS/DA.**
- d. Please indicate, by exchange and respective wire center, the number of unbundled local loops, if any, you are obtaining from the incumbent ILEC. **This information is not available by exchange.**
- e. Please indicate, by exchange and respective wire center, the number of access lines you are serving through UNE loop combinations, such as the UNE Platform. **This information is not available by exchange.**
- f. Please indicate the types of facilities deployed by your company in Florida to provide local telephone services, and indicate where these facilities are deployed. **This Question 6f (Exhibit "F") is filed with a request for "Confidential and Proprietary" Treatment.**
- g. If known, please indicate the number of access lines, by exchange, separately for residential and business customers, provisioned solely over company-owned facilities. **See responses to Questions 1a and 1b above for dedicated leased facility access line counts.**
- h. Please indicate, by exchange, the number of business access lines you serve that are provided to internet service providers. **This Question 6h (Exhibit "G") is filed with a request for "Confidential and Proprietary" Treatment.**
- i. Please indicate, by exchange, the number of business access lines you serve that are

provided to voicemail service providers. **0.**

7. Referring back to your responses to question number 6, please provide by subpart (e.g., 6(g)), where applicable, the number of voicegrade equivalent lines that you are providing (e.g. 1 DS1 should be considered equivalent to 24 voicegrade lines). **Please refer to responses in Question 6.**
8.
  - a. Please indicate the number and location of switches you have located in Florida (if any) used to provide services to customers in Florida, identify whether they are circuit or packet switches, and identify the manufacturer. **See response to Question 6f above.**
  - b. Please indicate the projected number and location of circuit and packet switches that you expect to locate in Florida within the next five years. **Unknown.**
  - c. If applicable, please indicate if and where you have deployed transport facilities, and describe the technology(ies) deployed. **See response to Question 6f above.**
9.
  - a. For each exchange where you are providing any form of residential local telephone services, please identify by exchange and respective wire center, the number of residential access lines served as of June 30, 2002. **See response to Question 6a above.**
  - b. 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, 2002. **See response to 6b above.**
10. For billing and accounting purposes, do you differentiate between residential and business customers? **Yes.**
11. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.

**Yes. BellSouth ties its ADSL service to its voice service and is using this tying arrangement as a barrier to local competition. Both anti-competitive and anti-consumer, BellSouth rejects otherwise valid orders to switch voice service to a competitor if the customer's service record has a DSL ordering code on the account - even if the end user is not receiving DSL service directly from BellSouth. Furthermore, BellSouth assigns the DSL service to the primary line (billing telephone number) of multi-line accounts. If a carrier plans to deliver service via UNE-P, this practice makes it necessary for the customer to contact BellSouth to have the DSL code either moved to a different working telephone number or to designate a different number as the billing telephone number before conversion can occur. Unless these changes are made, ALECs are restricted to reselling these lines as opposed to using UNE-P as a method of delivery. Finally, the DSL ordering code frequently continues to appear on the CSR when DSL service is no longer being provided.**

**In addition, ALECs do not have access to pending orders on their end-user accounts. BellSouth's retail operations are able to access and review an end-user's pending order records and provide real-time information should the customer have any questions. The ALEC, however, is blind to pending account order information. This issue could be resolved by requiring open access to BellSouth's OSS. CLECs should be allowed to view and cancel orders when acting as the customer's agent.**

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

**Yes. ITC^DeltaCom and BellSouth's Florida Interconnection Agreement specifies that a bill and keep compensation plan would be instituted under which neither BellSouth nor ITC^DeltaCom would charge the other for recurring and nonrecurring charges associated with local interconnection trunks and facilities for the exchange of traffic (other than Transit Traffic). ITC^DeltaCom has honored this agreement; BellSouth has not. Although we have been disputing invoices rendered by BellSouth since September 2000, BellSouth continues to bill ITC^DeltaCom for amounts which should not be billed under this agreement.**

**ITC^DeltaCom finds it difficult to incorporate new Commission orders into its Interconnection Agreement with BellSouth. It can take up to 6 to 12 weeks before negotiations begin for amendments requested by ITC^DeltaCom pursuant to Commission Order.**

13. Please describe your long-term (5 years) business strategy, including whether you intend to change your method of provisioning (e.g., from resale/missed to all UNEs to facilities-based).

**ITC^DeltaCom plans to continue to pursue facilities-based arrangements. We now offer facilities-based service to customers with as few as 6 lines and would like to drop that down to 4 lines in the future.**

14. Have you been assigned your own NXX codes? **Yes.** If yes, how many codes have you been assigned? For each code that you have been assigned as of June 30, 2002, how many numbers have been assigned and how many of those numbers have active status. If you have been assigned NXX codes, please identify where they have been homes for rating and routing purposes. **This Question 14 (Exhibit "H") is filed with a request for "Confidential and Proprietary" Treatment.**

15. a. At any time during the last 12 months have you provided local telephone services in Florida and then withdrawn the service? If yes, please identify the services(s), prices, and exchange, and discuss the reasons for this decision. **No.**
- b. During the last 12 months have you expanded your service offerings in Florida? **Yes.** If so, please list the new offerings, if they are residence or business (or both), their prices and the exchanges where you have offered the service. **SELECT 100, business – see response to Question 2b above.**

16. a. 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.). **Interexchange service and local service.**
- b. If you are involved in providing 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, and whether they are provided through your company itself, or an affiliate, or a business partner. **ITC^DeltaCom does not provide cable television service.**
- c. 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? **Yes.** If so, please describe any such plans and their terms and conditions. **Ala carte or bundled.** Is subscribing to both local telephone and long distance a condition of providing service? **Yes, but only for that particular product.**
17. 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. We are also seeking comment on alternative methods to evaluate the level of competition in Florida (e.g., use of the E911 databases, etc.) as well as comments or information on intermodal local competition (e.g., wireless, cable telephony).

**ITC^DeltaCom began providing competitive local services in other BellSouth states in July 1997. Initially, ITC^DeltaCom began by reselling BellSouth services and then at a certain point when it was cost effective, ITC^DeltaCom began serving customers through the purchase of unbundled network elements. ITC^DeltaCom relies on its Nortel DMS 500 switches and extensive fiber network. ITC^DeltaCom now primarily uses UNE-P due to the difficulties with "hot cuts".**

**ITC^DeltaCom recommends that the Commission consider requiring structural separation. It worked for AT&T and as a result the long distance market today is a very competitive market.**

**From ITC^DeltaCom's perspective, the single most important item is that real world, live order OSS testing is completed by the third party tester so that consumers can move from one telecom provider to another seamlessly without interruption of service.**

18. If your company filed a Form 477 with the Federal Communications Commission in March 2002, please enclose a copy of the completed Form 477 with your response to this data request.

**This Question 18 (Exhibit "I") is filed with a request for "Confidential and Proprietary" Treatment.**

19. Please provide a copy of the most up-to-date information that your company has provided to Wall Street analysts for the period July 1, 2001 through June 30, 2002 that discusses the number of access lines you provide as an ALEC in Florida. If the numbers differ from what you are reporting to the Florida Public Service Commission, please explain the differences.

**ITC^DeltaCom does not report access lines on a by-state basis to analysts.**

20. For the year ending December 31, 2001, please identify your total revenue from local service, broken out by business and residence.

**This Question 20 (Exhibit "J") is filed with a request for "Confidential and Proprietary" Treatment.**

21. As of December 31, 2001, how much money (in thousands of dollars) have you invested in your network?

**This Question 21 (Exhibit "K") is filed with a request for "Confidential and Proprietary" Treatment.**

22. Has your company filed either Chapter 7 or Chapter 11 bankruptcy in the past, are you currently operating under Chapter 7 or Chapter 11 protection, or do you anticipate possibly filing for Chapter 7 or Chapter 11 bankruptcy? If so, please provide relevant dates and details about the filing, including which chapter.

**On June 25, 2002, ITC^DeltaCom Communications, Inc.'s parent company, ITC^DeltaCom, Inc., filed a Chapter 11 bankruptcy petition in the United States Bankruptcy Court for the District of Delaware.**

**The Chapter 11 filing includes only the parent company, ITC^DeltaCom, Inc. The Company's operating subsidiaries, which include Interstate FiberNet, Inc. and ITC^DeltaCom Communications, Inc., are not part of the bankruptcy proceeding.**