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August 13, 2002

Ms. Roberta S. Bass, Chief
Office of Market Monitoring
And Strategic Analysis
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

020000-P4

Re: 2002 Incumbent Local Exchange Carrier (ILEC) Data Request

Dear Ms. Bass:

Verizon Florida Inc. (Verizon) is pleased to provide the enclosed response to your June 26, 2002, request for information. As you know, Verizon welcomes the opportunity to assist the Commission during its evaluation of local competition in Florida.

Upon review of the enclosed information you will find that, where applicable, Verizon has provided data in two forms, traditional access lines and voice grade equivalents. Using voice grade equivalents (VGEs) to count lines is common practice in the industry, as VGEs more accurately reflect the true number of lines provided to a customer. For example, customers purchasing an ISDN PRI system have 23 voice channels available to them. Thus, for each ISDN PRI system, there are 23 VGEs. Verizon uses VGEs in reports to shareholders, Wall Street analysts, and various regulatory bodies (i.e., Sec. 271 filings, FCC's Triennial UNE Review, etc.). For these reasons, Verizon plans to use VGEs in lieu of access line counts in its response to future requests for information. I believe you will find that VGEs offer a more accurate competitive picture than the access line counts the Commission traditionally requests.

As you know, the level of competition in Florida's local telecommunications market has increased annually since the passage of the Telecommunications Act in 1996. And growth has continued despite the recent economic downturn and media reports of scandals in the industry. Such growth is particularly pronounced in the Tampa Bay area where Verizon directly feels the effects of facilities-based competition. While the rise in facilities-based competition suggests that current UNE price levels are having the desired result (of encouraging investment in Florida), increased competition makes Verizon's need to maintain the confidentiality of its competitively sensitive information even more critical.

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The enclosed response is voluminous and complete with information that will assist the Commission in understanding competitive pressures. Absent, however, is highly sensitive data that discloses Verizon's ADSL revenues and detailed data about what specific ALECs purchase from Verizon. The Company is particularly concerned about disclosing ADSL revenue data, even under confidential cover, while its direct competitors in the xDSL market (ALECs and cable providers), are not required to do the same. Further, specific information about what Florida's ALECs are purchasing from Verizon are best directed to the ALECs themselves. Only they can provide a complete and accurate picture of their operations.

Again, thank you for the opportunity to assist the Commission in its evaluation of competition in Florida's local telecommunications market. If you have any questions or concerns, please feel free to contact me at (813) 483-2526.

Sincerely,



Michelle A. Robinson
Assistant Vice President
Regulatory Affairs Florida

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Enclosures