

# AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET  
P.O. BOX 391 (ZIP 32302)  
TALLAHASSEE, FLORIDA 32301  
(850) 224-9115 FAX (850) 222-7560

ORIGINAL

August 20, 2002

## CONFIDENTIAL DOCUMENTS ENCLOSED

### VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director  
Division of Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED-FPSC  
02 AUG 20 AM 10:14  
COMMISSION  
CLERK

Re: Undocketed Filings for 2002; Docket No. 020000-TP

Dear Ms. Bayo:

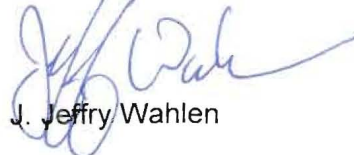
Enclosed for filing in the above docket are the original and fifteen (15) copies of Northeast Florida Telephone Company, Inc. d/b/a NEFCOM's Request for Confidential Classification. This request covers the Company's response to the Commission's data request on local competition, which was filed with the Division under a Notice of Intent to Request Confidential Classification on July 30, 2002.

**Exhibit "B" to the Request is a confidential version of the document for which confidential classification has been requested. One copy of Exhibit "B" is contained in a sealed envelope that is enclosed with this letter.**

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

Enclosures

h:\jjw\ne\byo.rcc.datarequest.doc

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

This request for confidentiality was filed by or on behalf of a telecommunications company for undocketed Confidential Document No. 08748-02. No ruling is required unless the material is subject to a request per 119.07, FS. Your division director must obtain written permission from the EXD/Tech for you to access the

DOCUMENT NUMBER-DATE  
08747 AUG 20 02  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filings for 2002

DOCKET NO. 020000-TP  
FILED: 08/20/2002

\_\_\_\_\_/

**NORTHEAST FLORIDA TELEPHONE COMPANY, INC.'S**  
**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Northeast Florida Telephone Company, Inc. d/b/a NEFCOM ("Northeast" or the "Company"), pursuant to Section 364.183, Florida Statute, and Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states:

1. Northeast is a telecommunications company with its principal place of business in Florida in Macclenny, Florida. Pleadings, orders, notices and other papers filed or served regarding this request should be served upon:

Debi Nobles  
Townes Telecom. Serv. Corp.  
P. O. Box 544  
Macclenny, FL 32063

J. Jeffry Wahlen  
Ausley & McMullen  
P. O. Box 391  
Tallahassee, FL 32302

2. On June 26, 2002, the Florida Public Service Commission sent to the Company a data request requesting information for use in the preparation of the Commission's next Local Competition Report to the Florida Legislature ("Data Request"). The Data Request seeks "data directly related to matters within the commission's jurisdiction in the form specified by the commission..." within the meaning of Section 364.183(1), Florida Statutes


3. On July 30, 2002, the Company filed its Confidential Response to the Data Request ("Response") with the Division of Commission Clerk and Administrative Services ("Clerk"), together with a Notice of Intent to Request Confidential Classification for portions of

its Response. Therein, the Company asserted that certain information therein was confidential and designated the confidential information by highlighting it with a yellow marker. The Company's confidential filing was assigned Document Number 07971-02. A non-confidential version (redacted) of the Response was contemporaneously delivered to the Commission's Office of Market Monitoring & Strategic Analysis. Thus, under Rule 25-22.006(5), Florida Administrative Code, the Commission is required to keep confidential and exempt from public disclosure the information asserted to be confidential by ALLTEL under the procedures in Section 25-22.006(5), Florida Administrative Code.

4. In addition, in accordance with the procedures set forth in Section 25-22.006(4), Florida Administrative Code, the Company asserts that the highlighted information in its Response is "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes, and requests that the Commission keep that information confidential and exempt from public disclosure in accordance with Section 25-22.006(4), Florida Administrative Code. Two edited versions of the data request with the confidential information redacted are attached as Exhibit "A." Another copy of the Response with the confidential information highlighted is attached as Exhibit "B." The line-by-line identification and justification required by Rule 25-22.006(4)(c), Florida Administrative Code, is attached as Exhibit "C." The material for which confidential classification is claimed and sought is intended to be and is treated by the Company as private and has not been disclosed.

WHEREFORE, Northeast respectfully requests that the Commission grant this Request for Confidential Classification.

Respectfully submitted this 20th day of August, 2002.



---

J. JEFFREY WAHLEN  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
850/425-5471

ATTORNEYS FOR NORTHEAST FLORIDA  
TELEPHONE COMPANY, INC.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filings for 2002

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DOCKET NO. 020000-TP  
FILED: 08/20/2002

**NORTHEAST FLORIDA TELEPHONE COMPANY, INC.'S**  
**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Two Edited Versions with Confidential Information Redacted

Exhibit A

**2002 Incumbent Local Exchange Carrier (ILEC) DATA REQUEST**

**Company:** NEFCOM

**Contact name & title:** Harriet E. Eudy

**Telephone number:** (386) 364-0700

**E-mail address:** heudy@nefcom.net

For the following questions, please provide the information requested as of June 30, 2002.

1. Please identify, by exchange and respective wire center, the number of **business** access lines served. (Please break down between non-resold v. resold lines and provide a total.)

**Response:**

	A	B	C
Exchange	Non-Resold Lines	Resold Lines	Total Business Access Lines
1 Macclenny	[REDACTED]	[REDACTED]	[REDACTED]
2 Sanderson	[REDACTED]	[REDACTED]	[REDACTED]
3 Total	2,121	190	2,311

2. Please identify, by exchange and respective wire center, the number of **residential** access lines served. (Please break down between non-resold v. resold lines and provide a total.)

*Examples (numbers for illustrative purposes only)*

Miami Exchange – Miami Beach

Business Access Lines: non-resold – 10,702; resold – 2,210; total 12,912

Residential Access Lines: non-resold– 15,467; resold – 1,422; total 16,889

Miami Exchange – Miami Metro

Business Access Lines: non-resold – 15,702; resold – 5,210; total 20,912

Residential Access Lines: non-resold–15,456; resold–10,222; total 25,689

Tampa East Exchange – Brandon

Business Access Lines: non-resold– 13,650; resold – 5,145; total – 18,795

Residential Access Lines–non-resold–14,252; resold–10,321; total–24,573

Clearwater Exchange – Clearwater

Business Access Lines: non-resold-10,650; resold-2,145; total-12,795

Residential Access Lines: non-resold-12,252; resold-4,321; total-16,573

**Response:**

A

B

C

1  
2  
3

Exchange	Non-Resold Lines	Resold Lines	Total Residential Access Lines
Maccienny	[REDACTED]	[REDACTED]	[REDACTED]
Sanderson	[REDACTED]	[REDACTED]	[REDACTED]
Total	7,014	955	7,969

3. Please indicate, by exchange and respective wire center served, the number of Alternative Local Exchange Carrier (ALEC) resold access lines, by type and to whom they were provided.

**Response:** NEFCOM prepares a monthly ALEC Access Line Report that details the number of resold access lines by type. Please see Attachment A of this response for the report for the period ending June 30, 2002.

4. (a) Please indicate, by exchange and respective wire center served, the number of UNEs provided, by type of UNE (including type of loop, e.g., 2-wire voicegrade unbundled loop, ADSL-capable unbundled loop, DS3 unbundled loop, port, etc.) and to whom they are provided. Where applicable, provide the voicegrade equivalent lines.

**Response:** NEFCOM does not currently provide any UNEs.

(b) Please indicate, by exchange and respective wire center served, the number and type of interconnection trunks provided to ALECs. Where applicable, provide the voicegrade equivalent lines.

**Response:** NEFCOM does not currently provide interconnection trunks to any ALECs.

5. (a) Please indicate, by exchange and respective wire center served, the number of UNE platform configurations provided, by configuration (e.g., loop and port, loop, port and switching, etc.) and to whom they are provided. Where applicable, provide the voicegrade equivalent lines.

**Response:** NEFCOM does not currently provide any UNEs.

6. (a) Please indicate, by exchange and respective wire center served, and by residence and business, the total number of lines over which your or an affiliate are providing xDSL service in Florida, including the type of DSL, e.g., ADSL, HDSL, etc..

**CONFIDENTIAL**

- (b) Please indicate your revenues from xDSL service, broken out by business and residence, recurring and non-recurring.
- (c) Please identify your exchanges and respective wire centers in which xDSL service is available.
- (d) Please identify your exchanges and respective wire centers in which xDSL service is not available.
- (e) Please identify your current rates for your xDSL offerings.

**Response:** NEFCOM does not currently provide any xDSL service.

- 7. If known, please identify the ALECs operating in each of your exchanges and respective wire centers.

**Response:** There are currently two ALECs operating in NEFCOM's Macclenny and Sanderson exchanges, Southeastern Services, Inc. (SSI) and Source One Communications, Inc. Details are reflected on Attachment A of this response.

- 8. Please provide any comments, suggestions or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. This may include alternative methods of calculating ALEC market share (e.g., E911 database). If you indicate alternative methods of calculating ALEC market share, please provide the data needed to calculate any of these alternative methods, or identify where such data can be obtained. In addition, we would appreciate any comments or information on intermodal local competition (e.g., wireless, cable telephony), reports or studies you have completed on ALEC market share, or anything else that you believe to be relevant.
- 9. Please provide a copy of your (or your parent company's) most recent annual report to stockholders, and Form 10-K.

**Response:** Not Applicable

- 10. Please provide year-end 2001 and 2002 data for total company Florida operations as outlined below. This data should be consistent in form with what your company previously provided in its 1995 Annual Report to the FPSC in Schedules I-1, S-2, and S-3.

**Operating Revenues (methodology consistent with 1995's I-1)**

Total Local Network Service Revenues:	<u>3,756,543</u>
Total Network Access:	<u>3,660,433</u>





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- (a) the number of residential access lines that were switched to a ALEC (i.e., that became resold lines)

<b><u>Response:</u></b>	June 30, 2001	June 30, 2002
	552	268

Note: Business/Residential split not available.

- (b) the number of business access lines that were switched to a ALEC (i.e., that became resold lines)

**Response:** See response to 11(a).

- (c) gross gain in residential access lines (not net of lines lost to resale)

**Response:** +197 (2001) +114 (2002)

- (d) gross gain in business access lines (not net of lines lost to resale)

**Response:** +226 (2001) -334 (2002) Note: Effective January 1, 2002, the access reform changed the way access lines are counted for PRI lines (which are included in business access lines for computing this response). Previously, PRI lines were reported by the number of NARS, and now each PRI arrangement will be counted as five. This results in an overstatement of the reduction in the gross gain (loss).

- (e) an estimate of the average revenue per line, per residential line lost

**Response:** Not available.

- (f) an estimate of the average revenue per line, per business line lost

**Response:** Not available.

- (g) the number of unbundled local loops provided to ALECs, by type (if available – i.e., 2W VG analog, etc.)

**Response:** None

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

**Response:** See Attachment B

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# NORTHEAST FLORIDA TELEPHONE COMPANY, INC.

SOURCE ONE COMMUNICATIONS, INC.

MONTHLY ALEC ACCESS LINE REPORT

EXCHANGES: 259,653 & 275

MONTH ENDING: JUNE 30, 2002

A B C D E F G H I J K L M N

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EXCHANGE	BUS	RES	BUS ROTARY HUNTING	ADS- PRI	CENTREX	PBX, DID & INWARD FLAT RATE TRUNKS	TOTAL ACCESS LINES	ISDN		600	TOTAL NON- SWITCH FX	REMOTE CALL FORWARDING	
								BUS	RES			BUS	RES
MCLN 259													
&													
653													
SNSN 275													
<b>TOTAL</b>	-	10	-	-	-	-	10	-	-	-	-	-	-
<b>MONTHLY GAIN/LOSS</b>	-	+1	-	-	-	-	+1	-	-	-	-	-	-
<b>YEARLY GAIN/LOSS</b>	-	6	-	-	-	-	+6	-	-	-	-	-	-

1  
2  
3

Jeff - 16 Pages

Fax to:

850-222-7560

# AST FLORIDA TELEPHONE COMPANY, INC.

SOUTHEASTERN SERVICES, INC.  
MONTHLY ALEC ACCESS LINE REPORT

MONTH ENDING: JUNE 30, 2002

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EXCHANGE	A		BUS ROTARY HUNTING	**ADS PRI	CENTREX	PBX, DID & INWARD FLAT RATE TRUNKS	TOTAL ACCESS LINES	H		000	TOTAL NON-SWITCH FX	M	
	BUS	RES						I	J			K	L
	BUS	RES						BUS	RES			BUS	RES
1 MCLN 258													
2 & 653													
3 SNSN 275													
<b>TOTAL</b>	109	946	32	35	-	14	1135	-	1	-	-	-	-
<b>MONTHLY GAINLOSS</b>	+3	+22	+2	-	-	-	+27	-	-	-	-	-	-
<b>YEARLY GAINLOSS</b>	+16	+170	+6	-86	-	-4	+82	-	-	-	-	-	-

\*\*Effective January 1, 2002 the access rates charged the way access lines are reported for PRI Lines. Previously, PRI lines were reported by the number of NARS, and now each PRI arrangement will be counted as five.

LAW OFFICES  
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST  
2120 L STREET, NW  
WASHINGTON, DC 20037

Attachment B  
Pg 1 of 14

AFFILIATED SOUTH AMERICAN OFFICES  
ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY  
BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SIAK  
D. CARY MITCHELL  
KATHLEEN A. KAERCHER  
DOUGLAS W. EVERETTE

(202) 638-0830  
FACSIMILE: (202) 828-5528

RECEIPT

March 1, 2002

ROBERT M. JACKSON  
OF COUNSEL

PERRY W. WOOPFER  
LEGISLATIVE CONSULTANT

EUGENE MALINZEWSKY  
DIRECTOR OF ENGINEERING  
PRIVATE RADIO

ARTHUR BLOOSTON  
1914 - 1999

CONFIDENTIAL

WRITERS CONTACT INFORMATION  
202-828-5528  
gid@bloostonlaw.com

By Messenger

Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED

MAR - 1 2002

Attention: Common Carrier Bureau  
Industry Analysis Division Room 6-A220  
Federal Communications Commission  
236 Massachusetts Avenue, NE Suite 110  
Washington, DC 20002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Northeast Florida Telephone Company, Inc.  
Local Competition and Broadband Report (FCC Form 477)

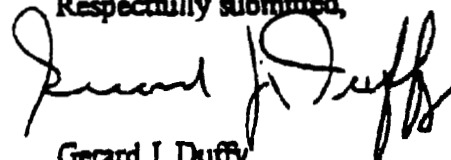
Dear Ms. Salas:

On behalf of Northeast Florida Telephone Company, Inc. ("the Company"), we are submitting herewith its Local Competition and Broadband Report (FCC Form 477) for the six-month period ending December 31, 2001.

This filing includes: (a) a Transmittal Letter; (b) a Certification Statement signed in ink by a Company officer; (c) one (1) 3.5-inch diskette labeled "Original," containing the FCC Form 477 with the applicable parts completed; and (d) one (1) 3.5-inch diskette labeled "Redacted" containing the nonconfidential, redacted version of the FCC Form 477.

Please direct any questions or correspondence regarding this filing to our office.

Respectfully submitted,



Gerard J. Duffy  
Douglas W. Everette  
Attorneys for  
Northeast Florida Telephone Company, Inc.

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D. Y. Puleo  
D. Boykin  
D. Carter

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Instructions for the Local Competition and Broadband Reporting Form, FCC Form 477 (For Filing Due 3/1/02)

**V. CERTIFICATION STATEMENT**

**FCC Form 477 Local Competition and Broadband Reporting  
CERTIFICATION STATEMENT**

Check the method (use ONLY one) used to deliver completed Form 477(s) to the FCC. See Instructions, Section IV, for the proper address to use for each delivery method:

E-mail  Overnight service other than United States Postal Service  
 Messenger or hand delivery  Other (specify: \_\_\_\_\_)

Also see Instructions, Section IV, for separate directions on how to submit the signed, original paper copy of this Certification Statement to the FCC.

This filing is an (check one)  original filing  revised filing

Organization name: Northeast Florida Telephone Company, Inc.

Number of files provided for this reporting period: 2

Year (of the data): 2001 Data as of (Check one: June 30 \_\_\_; December 31  )

I certify that I am an officer of Northeast Florida Telephone Company, Inc.; that I have examined the information contained in the data files attached herein and that to the best of my knowledge, information and belief, all statements of fact contained in such files are true and that said files represent an accurate statement of the affairs of the above named respondent as of the following date:

February 22, 2002

If I have requested non-disclosure of some or all of the information in FCC Form 477 by so indicating on Line 10 of the form, I certify that this information is privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the respondent.

PRINTED NAME: Leon Conner

POSITION: President

SIGNATURE: *Leon Conner*

DATE: February 22, 2002

Persons making willful false statements in the report form can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).

CONTACT PERSON: Mike Crews

TELEPHONE NUMBER: (904) 259-0614

FEDERAL COMMUNICATIONS COMMISSION

**FCC Form 477 -- Local Competition and Broadband Reporting**

Cover Page - Name & Contact Information

All filers must complete this section.

File data as of December 31, 2001

1. Filing status Meet local competition threshold only
2. Company
3. Indicate the category that best describes the operations covered by this filing.  
Wireline Local Exchange Carrier
4. Filers must report separate data for ILEC and non-ILEC operations. Use the following drop-down box to indicate whether this worksheet contains data for ILEC or for non-ILEC operations.  
ILEC operations
5. Use the following drop-down box to select your company, parent or controlling entity name. Select "not shown" if it is not in the list. See instructions Section IV-B-1 for information on preparing file names.  
Townes Telecommunications, Inc.

If you selected "not shown" above, then provide the following:

- Name of company, parent or controlling entity.
6. State Florida
  7. Contact person (person who prepared the data contained below).  
Mike Crews
  8. Contact person telephone number and e-mail address.  
phone 904-259-0814  
e-mail mcrews@necom.net
  9. Indicate whether this is an original or revised filing.  
Original Filing
  10. Indicate whether you request non-disclosure of some or all of the information in this file because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.  
Filer certifies that some data in this report is privileged and confidential
  11. If you requested non-disclosure in line 10, indicate if this is your complete or redacted file.  
Complete version of file

Please review instructions before completing form

Reminders:

- 1) Ensure files are virus free by using up-to-date virus detection software. Filers are encouraged to submit files via e-mail (address: [FCC477@fcc.gov](mailto:FCC477@fcc.gov)).
- 2) If you are filing original or revised data for an earlier semi-annual reporting period, do not use this particular form (which is only for data as of December 31, 2001). See reminder 4.
- 3) You may not insert or delete columns or rows, move cells, or edit text or numbers outside the cells provided for data entries. Files that cannot be opened in EXCEL97, files whose structure has been altered, and files with improper names will have to be refiled.
- 4) If you have questions about the form, contact the Common Carrier Bureau, Industry Analysis Division at (202) 418-0940; via e-mail at [477INFO@fcc.gov](mailto:477INFO@fcc.gov), or via TTY at (202) 418-0484.
- 5) You must submit a Certification Statement signed by an officer of your company. A single statement may cover all files submitted. See instructions sections IV &
- 6) If you request non-disclosure of some data, you must file a public version of the form with such information redacted. See instructions sections IV.B and IV.C for information on preparing a redacted file.
- 7) Name your files as specified in instructions section IV.B.1. To assist you, complete this Cover Page to generate an "example" name, below. Replace the character "X" in this example name with a sequence number as specified in the instructions. This number should be "1" unless using "1" would cause you to submit more than one file with the identical file name.

Example FLB#001name.XLS

OMB NO: 3080-0816

EXPIRATION DATE: 11/30/2003

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Complete Part I if you and all affiliates (including commonly controlled entities) provide 250 or more broadband lines or wireless channels in the state over your own facilities or over lines you provisioned as broadband. See instructions for definitions of "own facilities", "broadband", "end user", and "residential and small business".

If you provide data in Part I, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the broadband services reported herein. See instructions.

Data as of December 31, 2001

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Lines and wireless channels of broadband service that you provided over your own facilities, or over UNE loops or other lines and wireless channels that you obtained from other service providers and equipped as broadband, categorized by technology at the end-user location.

(a) Total one-way and two-way (full) broadband lines and wireless channels	Percentages of lines and wireless channels reported in (a)				
	(b) % of (a) used by residential & small business customers	(c) % of (a) provided over your own facilities	(d) % of (a) provided (i.e. billed directly) to end users	(e) % of (a) providing customers greater than 200 kbps in both directions	(f) % of (a) providing customers greater than 2 mbps in both directions
1 - 1. Asymmetric xDSL.					
1 - 2. Other traditional wireline including symmetric xDSL.				100%	
1 - 3. Coaxial carrier systems including hybrid fiber-coaxial systems.					
1 - 4. Optical carrier (fiber to the end user).					
1 - 5. Satellite.					
1 - 6. Terrestrial wireless fixed.					
1 - 7. Terrestrial wireless mobile.					
1 - 8. All other technologies, such as distribution over electric power lines.					

Note: In Part I, report actual counts. Do not report voice-grade equivalent measures.

Complete Part II if you and all affiliates (including commonly controlled entities) provide 10,000 or more voice-grade equivalent lines or wireless voice-grade equivalent channels used for local exchange or exchange access service in the state. See instructions for definitions of "voice telephone service", "voice-grade equivalent lines", "residential and small business", "owned facilities", "COLO switching centers", and "end users".

If you provide data in Part II, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the wireline or fixed wireless voice grade services reported herein. See instructions.

Date as of December 31, 2001

**A. Voice telephone service provided to end users.**

II - 1. Total lines and channels you provided to end users.

**B. Voice telephone service provided to other communications carriers, categorized by:**

II - 2. Lines and channels that you provided under a Total Service Resale arrangement. See instructions.

II - 3. Lines and channels you provided under other resale arrangements, such as resold Centrex.

**C. UNE loops, special access lines, and those private lines that connect to carriers, categorized by:**

II - 4. Lines and channels that you provided under a UNE loop arrangement, where you do not provide switching for the line.

II - 5. Lines and channels that you provided under a UNE loop arrangement, where you also provided switching for the line.

II - 6. Special access lines not provided as broadband and private lines that connect an end-user premises to a telecommunications common carrier and is not provided as broadband.

**D. Total wireline voice-grade equivalent lines & fixed wireless voice-grade equivalent channels in service.**

II - 7. Total lines and channels provided. [line II-1+line II-2 + line II-3]

(a) Total voice-grade equivalent lines and voice-grade equivalent wireless channels in service	Percentages of lines and wireless channels reported in (a)			
	(b) % of (a) used for residential & small business service	(c) % of (a) provided over your own facilities	(d) % of (a) provided over UNE loops	(e) % of (a) in ILEC COLO switching centers
II - 1				
II - 2				
II - 3				
(a) Total lines and wireless channels				
II - 4				
II - 5				
II - 6				

Percentage of channels reported in (a), carried over the following types of facilities categorized by the technology used in the part of the line or wireless channel at the end-user location

(f) Cable coaxial	(g) Wireless	(h) All other including traditional wireline
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II - 7			
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1804 259 7723

CONFIDENTIAL

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Complete Part III if you and all affiliates (including commonly controlled entities) serve 10,000 or more mobile voice telephony subscribers in the state over your own facilities. See Instructions for definitions of "mobile voice telephony subscribers" and "owned facilities".

CONFIDENTIAL

Data as of December 31, 2001

A. Mobile voice telephony subscribers in service and served over your own facilities.

(a) Network telephone service subscribers	(b) Percentage of (a) provided (i.e. billed directly) to end users
--	--

III - 1. Cellular, PCS & other mobile telephony.



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Filers completing Part I or Part II must supply a list of 5-digit Zip Codes in which the filer has at least one customer.  
Do not provide customer counts by Zip Code.

Date as of December 31, 2001

V - 1. 5-digit Zip Codes in the state in which you provide service to end-user locations:

(a) Broadband service	(b) Wireline & fixed wireless exchange telephone
-----------------------------	---

1		<b>32083</b>
2		<b>32040</b>
3		<b>32087</b>
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**2002 Incumbent Local Exchange Carrier (ILEC) DATA REQUEST**

Company: NEFCOM

Contact name & title: Harriet E. Eudy

Telephone number: (386) 364-0700

E-mail address: heudy@nefcom.net

For the following questions, please provide the information requested as of June 30, 2002.

1. Please identify, by exchange and respective wire center, the number of **business access lines** served. (Please break down between non-resold v. resold lines and provide a total.)

**Response:**

		A	B	C
	Exchange	Non-Resold Lines	Resold Lines	Total Business Access Lines
1	Macclenny	[REDACTED]	[REDACTED]	[REDACTED]
2	Sanderson	[REDACTED]	[REDACTED]	[REDACTED]
3	Total	2,121	190	2,311

2. Please identify, by exchange and respective wire center, the number of **residential access lines** served. (Please break down between non-resold v. resold lines and provide a total.)

*Examples (numbers for illustrative purposes only)*

Miami Exchange – Miami Beach

Business Access Lines: non-resold – 10,702; resold – 2,210; total 12,912

Residential Access Lines: non-resold– 15,467; resold – 1,422; total 16,889

Miami Exchange – Miami Metro

Business Access Lines: non-resold – 15,702; resold – 5,210; total 20,912

Residential Access Lines: non-resold–15,456; resold–10,222; total 25,689

Tampa East Exchange – Brandon

Business Access Lines: non-resold– 13,650; resold – 5,145; total – 18,795

Residential Access Lines–non-resold–14,252; resold–10,321; total–24,573

Clearwater Exchange – Clearwater

Business Access Lines: non-resold-10,650; resold-2,145; total-12,795

Residential Access Lines: non-resold-12,252; resold-4,321; total-16,573

**Response:**

A B C

1  
2  
3

Exchange	Non-Resold Lines	Resold Lines	Total Residential Access Lines
Macclenny	[REDACTED]	[REDACTED]	[REDACTED]
Sanderson	[REDACTED]	[REDACTED]	[REDACTED]
Total	7,014	955	7,969

3. Please indicate, by exchange and respective wire center served, the number of Alternative Local Exchange Carrier (ALEC) resold access lines, by type and to whom they were provided.

**Response:** NEFCOM prepares a monthly ALEC Access Line Report that details the number of resold access lines by type. Please see Attachment A of this response for the report for the period ending June 30, 2002.

4. (a) Please indicate, by exchange and respective wire center served, the number of UNEs provided, by type of UNE (including type of loop, e.g., 2-wire voicegrade unbundled loop, ADSL-capable unbundled loop, DS3 unbundled loop, port, etc.) and to whom they are provided. Where applicable, provide the voicegrade equivalent lines.

**Response:** NEFCOM does not currently provide any UNEs.

(b) Please indicate, by exchange and respective wire center served, the number and type of interconnection trunks provided to ALECs. Where applicable, provide the voicegrade equivalent lines.

**Response:** NEFCOM does not currently provide interconnection trunks to any ALECs.

5. (a) Please indicate, by exchange and respective wire center served, the number of UNE platform configurations provided, by configuration (e.g., loop and port, loop, port and switching, etc.) and to whom they are provided. Where applicable, provide the voicegrade equivalent lines.

**Response:** NEFCOM does not currently provide any UNEs.

6. (a) Please indicate, by exchange and respective wire center served, and by residence and business, the total number of lines over which your or an affiliate are providing xDSL service in Florida, including the type of DSL, e.g., ADSL, HDSL, etc..

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- (b) Please indicate your revenues from xDSL service, broken out by business and residence, recurring and non-recurring.
- (c) Please identify your exchanges and respective wire centers in which xDSL service is available.
- (d) Please identify your exchanges and respective wire centers in which xDSL service is not available.
- (e) Please identify your current rates for your xDSL offerings.

**Response:** NEFCOM does not currently provide any xDSL service.

- 7. If known, please identify the ALECs operating in each of your exchanges and respective wire centers.

**Response:** There are currently two ALECs operating in NEFCOM's Macclenny and Sanderson exchanges, Southeastern Services, Inc. (SSI) and Source One Communications, Inc. Details are reflected on Attachment A of this response.

- 8. Please provide any comments, suggestions or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. This may include alternative methods of calculating ALEC market share (e.g., E911 database). If you indicate alternative methods of calculating ALEC market share, please provide the data needed to calculate any of these alternative methods, or identify where such data can be obtained. In addition, we would appreciate any comments or information on intermodal local competition (e.g., wireless, cable telephony), reports or studies you have completed on ALEC market share, or anything else that you believe to be relevant.
- 9. Please provide a copy of your (or your parent company's) most recent annual report to stockholders, and Form 10-K.

**Response:** Not Applicable

- 10. Please provide year-end 2001 and 2002 data for total company Florida operations as outlined below. This data should be consistent in form with what your company previously provided in its 1995 Annual Report to the FPSC in Schedules I-1, S-2, and S-3.

**Operating Revenues (methodology consistent with 1995's I-1)**

Total Local Network Service Revenues:	<u>3,756,543</u>
Total Network Access:	<u>3,660,433</u>



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Total Long Distance Network:	329,169
Total Miscellaneous	407,197
Grand Total – Company:	8,153,352

Information provided is for year-end 2001. 2002 is not yet available.

## Access Lines in Service by Customer (methodology consistent with 1995's S-2)

	Non-Resold	Resold	Total
Business:			
Single Line:	1,113	93	1,206
Multi Line:	1,160	175	1,335
Public Access Lines:	104	0	104
Residential Access Lines:	7,076	779	7,855
Mobile Access Lines:	0	0	0
Total Acc Lines (Switched and Special):	9,453	1,047	10,500

Note: Multi-Line Includes Rotary, PRI, Centrex, PBX

Information provided is for year-end 2001. 2002 is not yet available.

If the access line data provided above includes resold access lines (i.e., purchased from you by ALECs for resale), please separate the access line data between those lines which are not resold and those which are resold. If the access line data above does not include resold lines, please provide the number of resold lines broken down into the same categories.

## Telephone Calls (methodology consistent with 1995's S-3)

Local Calls:	Not Available
IntraLATA Toll Calls Completed (Originating):	Not Available
InterLATA Toll Calls Completed (Originating):	Not Available
Interstate:	
Intrastate:	
Total:	
InterLATA Billed Access Minutes (Originating and Terminating)	
Interstate:	23,042,737
Intrastate:	9,396,347
Total:	32,439,084

Information provided is for year-end 2001. 2002 is not yet available.

11. Please provide the following information for each of the 12 month periods ending June 30, 2001 and 2002.

**CONFIDENTIAL**

(a) the number of residential access lines that were switched to a ALEC (i.e., that became resold lines)

<b><u>Response:</u></b>	June 30, 2001	June 30, 2002
	552	268

Note: Business/Residential split not available.

(b) the number of business access lines that were switched to a ALEC (i.e., that became resold lines)

**Response:** See response to 11(a).

(c) gross gain in residential access lines (not net of lines lost to resale)

**Response:** +197 (2001) +114 (2002)

(d) gross gain in business access lines (not net of lines lost to resale)

**Response:** +226 (2001) -334 (2002) Note: Effective January 1, 2002, the access reform changed the way access lines are counted for PRI lines (which are included in business access lines for computing this response). Previously, PRI lines were reported by the number of NARS, and now each PRI arrangement will be counted as five. This results in an overstatement of the reduction in the gross gain (loss).

(e) an estimate of the average revenue per line, per residential line lost

**Response:** Not available.

(f) an estimate of the average revenue per line, per business line lost

**Response:** Not available.

(g) the number of unbundled local loops provided to ALECs, by type (if available – i.e., 2W VG analog, etc.)

**Response:** None

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

**Response:** See Attachment B

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# NORTHEAST FLORIDA TELEPHONE COMPANY, INC.

## SOURCE ONE COMMUNICATIONS, INC. MONTHLY ALEC ACCESS LINE REPORT

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EXCHANGES: 259, 653 & 275

MONTH ENDING: JUNE 30, 2002

A B C D E F G H I J K L M N

EXCHANGE	BUS	RES	BUS ROTARY HUNTING	ADS- PRI	CENTREX	PBX, DID & INWARD FLAT RATE TRUNKS	TOTAL ACCESS LINES	ISDN		800	TOTAL NON- SWITCH FX	REMOTE CALL FORWARDING	
								BUS	RES			BUS	RES
MCLN 259													
&													
653													
SNSN 275													
<b>TOTAL</b>	-	10	-	-	-	-	10	-	-	-	-	-	-
<b>MONTHLY GAIN/LOSS</b>	-	+1	-	-	-	-	+1	-	-	-	-	-	-
<b>YEARLY GAIN/LOSS</b>	-	6	-	-	-	-	+6	-	-	-	-	-	-

1  
2  
3

Jeff - 16 Pages

Fax to:

850-222-7560

**AST FLORIDA TELEPHONE COMPANY, INC.**

**SOUTHEASTERN SERVICES, INC.  
MONTHLY ALEC ACCESS LINE REPORT**

MONTH ENDING: JUNE 30, 2002

**CONFIDENTIAL**

EXCHANGE	A		BUS ROTARY HUNTING	**ADS PRI	CENTREX	PBX, DID & INWARD FLAT RATE TRUNKS	TOTAL ACCESS LINES	I		800	TOTAL NON-SWITCH FX	M	
	BUS	RES						BUS	RES			BUS	RES
	MCLN 259												
&													
653													
SNSN 275													
<b>TOTAL</b>	100	948	32	35	-	14	1135	-	1	-	-	-	-
<b>MONTHLY GAINLOSS</b>	+3	+22	+2	-	-	-	+27	-	-	-	-	-	-
<b>YEARLY GAINLOSS</b>	+18	+170	+8	-86	-	-4	+82	-	-	-	-	-	-

\*\*Effective January 1, 2002 the access reports changed the way access lines are reported for PRI Lines. Previously, PRI lines were reported by the number of BARS, and now each PRI arrangement will be counted as five.

LAW OFFICES  
BLOOSTON, MORDKOWSKY, DICKENS, DUFFY & PRENDERGAST  
2120 L STREET, NW  
WASHINGTON, DC 20037

Attachment B  
Pg 1 of 14

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO LAUREL & ASSOCIATES  
BUENOS AIRES, ARGENTINA

HAROLD MORDKOWSKY  
BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SRAK  
D. CARY MITCHELL  
KATHLEEN A. KAERCHER  
DOUGLAS W. EVERETTE

(202) 638-0830  
FACSIMILE (202) 828-5568

RECEIPT

March 1, 2002

ROBERT M. JACKSON  
OF COUNSEL

PERRY W. WOOPPER  
LEGISLATIVE CONSULTANT

ELIZABETH MALCZEWSKY  
DIRECTOR OF ENGINEERING  
PRIVATE RADIO

ARTHUR BLOOSTON  
1914-1999

CONFIDENTIAL

WRITERS CONTACT INFORMATION  
202-828-5528  
gid@bloostonlaw.com

By Messenger  
Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED

MAR - 1 2002

Attention: Common Carrier Bureau  
Industry Analysis Division Room 6-A220  
Federal Communications Commission  
236 Massachusetts Avenue, NE Suite 110  
Washington, DC 20002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Northeast Florida Telephone Company, Inc.  
Local Competition and Broadband Report (FCC Form 477)

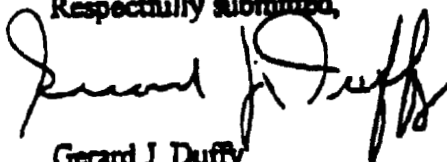
Dear Ms. Salas:

On behalf of Northeast Florida Telephone Company, Inc. ("the Company"), we are submitting herewith its Local Competition and Broadband Report (FCC Form 477) for the six-month period ending December 31, 2001.

This filing includes: (a) a Transmittal Letter; (b) a Certification Statement signed in ink by a Company officer; (c) one (1) 3.5-inch diskette labeled "Original," containing the FCC Form 477 with the applicable parts completed; and (d) one (1) 3.5-inch diskette labeled "Redacted" containing the nonconfidential, redacted version of the FCC Form 477.

Please direct any questions or correspondence regarding this filing to our office.

Respectfully submitted,



Gerard J. Duffy  
Douglas W. Everette

Attorneys for  
Northeast Florida Telephone Company, Inc.

D. Y. Puleo  
D. Boykin

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**CONFIDENTIAL**

Instructions for the Local Competition and Broadband Reporting Form, FCC Form 477 (For Filing Due 3/1/02)

**V. CERTIFICATION STATEMENT**

**FCC Form 477 Local Competition and Broadband Reporting  
CERTIFICATION STATEMENT**

Check the method (use ONLY one) used to deliver completed Form 477(s) to the FCC. See Instructions, Section IV, for the proper address to use for each delivery method:

E-mail                                       Overnight service other than United States Postal Service  
 Messenger or hand delivery     Other (specify: \_\_\_\_\_)

Also see Instructions, Section IV, for separate directions on how to submit the signed, original paper copy of this Certification Statement to the FCC.

This filing is an (check one)  original filing     revised filing

Organization name: Northeast Florida Telephone Company, Inc.

Number of files provided for this reporting period: 2

Year (of the data): 2001    Data as of: [Check one: June 30 \_\_\_; December 31 X ]

I certify that I am an officer of Northeast Florida Telephone Company, Inc.; that I have examined the information contained in the data files attached herein and that to the best of my knowledge, information and belief, all statements of fact contained in such files are true and that said files represent an accurate statement of the affairs of the above named respondent as of the following date:  
February 22, 2002

If I have requested non-disclosure of some or all of the information in FCC Form 477 by so indicating on Line 10 of the form, I certify that this information is privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the respondent.

PRINTED NAME: Leon Conner

POSITION: President

SIGNATURE: *Leon Conner*

DATE: February 22, 2002

Persons making willful false statements in the report form can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).

CONTACT PERSON: Mike Crews

TELEPHONE NUMBER: (904) 259-0614

FEDERAL COMMUNICATIONS COMMISSION

10

**FCC Form 477 – Local Competition and Broadband Reporting**

**Cover Page - Name & Contact Information**

All filers must complete this section.

File data as of December 31, 2001

1. Filing status Meet local competition threshold only
2. Company
3. Indicate the category that best describes the operations covered by this filing.  
Wireline Local Exchange Carrier
4. Filers must report separate data for ILEC and non-ILEC operations. Use the following drop-down box to indicate whether this worksheet contains data for ILEC or for non-ILEC operations.  
ILEC operations
5. Use the following drop-down box to select your company, parent or controlling entity name. Select "not shown" if it is not in the list. See instructions Section IV-B-1 for information on preparing file names.

Townes Telecommunications, Inc.

If you selected "not shown" above, then provide the following:

Name of company, parent or controlling entity.

6. State Florida
7. Contact person (person who prepared the data contained below).  
Mike Crews
8. Contact person telephone number and e-mail address.  
phone 904-259-0814  
e-mail mcrews@onecom.net
9. Indicate whether this is an original or revised filing.  
Original Filing

10. Indicate whether you request non-disclosure of some or all of the information in this file because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.  
Filer certifies that some data in this report is privileged and confidential

11. If you requested non-disclosure in line 10, indicate if this is your complete or redacted file.  
Complete version of file

Please review instructions before completing form

Reminders:

- 1) Ensure files are virus free by using up-to-date virus detection software. Filers are encouraged to submit files via e-mail (address: FCC477@fcc.gov).
- 2) If you are filing original or revised data for an earlier semi-annual reporting period, do not use this particular form (which is only for data as of December 31, 2001). See reminder 4.
- 3) You may not insert or delete columns or rows, move cells, or edit text or numbers outside the cells provided for data entries. Files that cannot be opened in EXCEL97, files whose structure has been altered, and files with improper names will have to be refiled.
- 4) If you have questions about the form, contact the Common Carrier Bureau, Industry Analysis Division at (202) 418-0840; via e-mail at 477INFO@fcc.gov; or via TTY at (202) 418-0484.
- 5) You must submit a Certification Statement signed by an officer of your company. A single statement may cover all files submitted. See instructions sections IV & 8
- 6) If you request non-disclosure of some data, you must file a public version of the form with such information redacted. See instructions sections IV.B and IV.C for information on preparing a redacted file.
- 7) Name your files as specified in instructions section IV.B.1. To assist you, complete this Cover Page to generate an "example" name, below. Replace the character "X" in this example name with a sequence number as specified in the instructions. This number should be "1" unless using "1" would cause you to submit more than one file with the identical file name.

Example FLB#001name.XLS

OMB NO: 3080-0816  
EXPIRATION DATE: 11/30/2003

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Complete Part I if you and all affiliates (including commonly controlled entities) provide 250 or more broadband lines or wireless channels in the state over your own facilities or over lines you provisioned as broadband. See instructions for definitions of "own facilities", "broadband", "end user", and "residential and small business".

If you provide data in Part I, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the broadband services reported herein. See instructions.

CONFIDENTIAL

Date as of December 31, 2001

Lines and wireless channels of broadband service that you provided over your own facilities, or over UNE loops or other lines and wireless channels that you obtained from other service providers and equipped as broadband, categorized by technology at the end-user location.

(a) Total one-way and two-way (full) broadband lines and wireless channels	Percentages of lines and wireless channels reported in (a)				
	(b) % of (a) used by residential & small business customers	(c) % of (a) provided over your own facilities	(d) % of (a) provided (i.e. billed directly) to end users	(e) % of (a) providing customers greater than 200 kbps in both directions	(f) % of (a) providing customers greater than 2 mbps in both directions
1-1. Asymmetric xDSL					
1-2. Other traditional wireline including symmetric xDSL				100%	
1-3. Coaxial carrier systems including hybrid fiber-coaxial systems					
1-4. Optical carrier (fiber to the end user)					
1-5. Satellite					
1-6. Terrestrial wireless fixed					
1-7. Terrestrial wireless mobile					
1-8. All other technologies, such as distribution over electric power lines					

Note: In Part I, report actual counts. Do not report voice-grade equivalent measures.

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Complete Part II if you and all affiliates (including commonly controlled entities) provide 10,000 or more voice-grade equivalent lines or wireless voice-grade equivalent channels used for local exchange or exchange access service in the state. See instructions for definitions of "voice telephone service", "voice-grade equivalent lines", "residential and small business", "owned facilities", "COLO switching centers", and "end users".

If you provide data in Part II, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the wireline or fixed wireless voice grade services reported herein. See instructions.

Date as of December 31, 2001

**A. Voice telephone service provided to end users.**

II - 1. Total lines and channels you provided to end users.

**B. Voice telephone service provided to other communications carriers, categorized by:**

II - 2. Lines and channels that you provided under a Total Service Resale arrangement. See instructions.

II - 3. Lines and channels you provided under other resale arrangements, such as resold Centrex.

**C. UNE loops, special access lines, and those private lines that connect to carriers, categorized by:**

II - 4. Lines and channels that you provided under a UNE loop arrangement, where you do not provide switching for the line.

II - 5. Lines and channels that you provided under a UNE loop arrangement, where you also provided switching for the line.

II - 6. Special access lines not provided as broadband and private lines that connect an end-user premises to a telecommunications common carrier and is not provided as broadband.

(a) Total voice-grade equivalent lines and voice-grade equivalent wireless channels in service	Percentages of lines and wireless channels reported in (a)			
	(b) % of (a) used for residential & small business service	(c) % of (a) provided over your own facilities	(d) % of (a) provided over UNE loops	(e) % of (a) in ILEC COLO switching centers
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
II - 2. [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
II - 3. [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
(a) Total lines and wireless channels				
II - 4. [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
II - 5. [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
II - 6. [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Percentage of channels reported in (a), carried over the following types of facilities categorized by the technology used in the part of the line or wireless channel at the end-user location

**D. Total wireline voice-grade equivalent lines & fixed wireless voice-grade equivalent channels in service.**

II - 7. Total lines and channels provided. [line II-1+line II-2 + line II-3]

(f) Cable coaxial	(g) Wireless	(h) All other including traditional wireline
[Redacted]	[Redacted]	[Redacted]

-----

Complete Part III if you and all affiliates (including commonly controlled entities) serve 10,000 or more mobile voice telephony subscribers in the state over your own facilities. See Instructions for definitions of "mobile voice telephony subscribers" and "owned facilities".

CONFIDENTIAL

Data as of December 31, 2001

A Mobile voice telephony subscribers in service and served over your own facilities.

(a) Network telephone service subscribers	(b) Percentage of (a) provided (i.e. billed directly) to end users
--	--

III - 1. Cellular, PCS & other mobile telephony.



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Filers completing Part I or Part II must supply a list of 5-digit Zip Codes in which the filer has at least one customer. Do not provide customer counts by Zip Code.

Date as of December 31, 2001

V - 1. 5-digit Zip Codes in the state in which you provide service to end-user locations:

(a) Broadband service	(b) Wireline & fixed wireless exchange telephone
-----------------------------	---

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1		<b>32083</b>
2		<b>32040</b>
3		<b>32087</b>
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2001 11/30 10:00 AM

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filings for 2002

DOCKET NO. 020000-TP  
FILED: 08/20/2002

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**NORTHEAST FLORIDA TELEPHONE COMPANY, INC.'S**  
**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Line-by-line Justification

<u>Page</u>	<u>Line(s)</u>	<u>Column(s)</u>	<u>Explanation</u>
1	1-2	A-C	These data points reflect the number of the Company's business access lines in service by exchange in the Company's territory. This data is competitive data and is confidential because disclosure could harm the Company for the reasons explained in Note 1.
2	1-2	A-C	These data points reflect the number of the Company's residential access lines in service by exchange in the Company's territory. This data is competitive data and is confidential because disclosure could harm the Company for the reasons explained in Note 1.
7	1-3	A-N	These data points reflect the number of access lines being resold by one specific competitor in each of the Company's exchanges. This data is competitive information and is confidential because disclosure would harm the Company for the reasons explained in Note 1.
8	1-3	A-O	These data points reflect the number of access lines being resold by one specific competitor in each of the Company's exchanges. This data is competitive information and is confidential because disclosure would harm the Company for the reasons explained in Note 1.

<u>Page</u>	<u>Line(s)</u>	<u>Column(s)</u>	<u>Explanation</u>
13	1-7	A	These data points reflect voice telephone services by type of customer. This is confidential market share data that is confidential because disclosure would harm the Company for the reasons explained in Note 1.
	1-6	B, C, D, E	
	7	F, G, H	

Note 1

The highlighted information reflects the Company's market penetration and/or market share for a service offered by the Company and competitors. By its very nature, the data demonstrates the extent to which the Company has been successful competing for customers and/or the number of customers served by the Company for which other competitors can compete. This data is valuable market share information that can be used by competitors and potential competitors to evaluate whether, when, where and how to compete in the relevant market. Information of this type and in this detail for the Company's competitors is not publicly available; therefore, public disclosure of the data will place the Company at a competitive disadvantage, thereby harming the Company.