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July 31, 2003

VIA HAND DELIVERY

Ms. Blanca Bayo
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: CONFIDENTIAL MATERIALS *undocketed*
XO Florida, Inc.'s Response to 2003 Local Competition Report Data Request

Dear Ms. Bayo:

Attached is a confidential copy of XO Florida, Inc.'s Response to the Commission's Local Competition Report Data Request.

The highlighted portions of the responses are proprietary confidential business information of XO Florida, Inc. within the meaning of Section 364.183(1), Florida Statutes. These highlighted responses contain sensitive business information relating to competitive interests, and the public disclosure of this information would impair the competitive business of XO Florida, Inc.

One copy is enclosed which highlights the information for which XO Florida, Inc. claims confidentiality. Two redacted copies are also enclosed.

If you have any questions, please contact me.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/bae
Enclosure
Cc: Roberta Bass
Dana Shaffer

XO Florida, Inc.'s
Responses to 2003 Competitive Local Exchange Carrier (CLEC) Data Request

Legal company name: XO Florida, Inc.

FPSC Company Codes: TX205, TJ112

Stock symbol: XOCM.OB

Contact Name and Title: Dana Shaffer, Vice President, Regulatory Counsel

Telephone Number: 615-777-7700

Email Address: dshaffer@xo.com

1. Access Line Data for XO is attached hereto as Proprietary Exhibit A; XO does not maintain this information by the traditional ILEC structure of exchange or wire center. The level of detail, including number of lines served entirely on XO's network, is included in Proprietary Exhibit A hereto.
2. Except as set forth in Exhibits A and E, XO does not track the information in the format requested.
3. See attached Proprietary Exhibit B, containing the requested collocation information.
4. See attached Proprietary Exhibit C, containing the requested switch data.
5. XO's product offering includes a substantial number of bundled services, therefore, the exact line count information is not readily available. Broadband line counts as of December 31, 2002, are included in XO's Form 477, attached hereto as Proprietary Exhibit E.
6. XO does not have such generally available offering.
7. XO does not market to residential customers.
8. XO has no plans to change its long-term business strategy of being a facilities-based provider of local, long distance, and data service solutions.
9. All of XO's regulated business service offerings, including new or expanded offerings, have previously been filed with the Commission in XO's tariffs. The data request does not make clear what is meant by "expanded" – certainly, XO's initial business product offering has been expanded to include bundled offerings of local access, high speed data, toll services, and other services, including web hosting, and its initial service territory has gradually expanded to include the greater MSAs of Tampa, Orlando, Miami, and Ft. Lauderdale. All of XO's service territories and regulated service offerings are set forth in XO's tariffs. XO has not expanded any residential offering during the past 12 months.
10. XO's primary line of business is offering a complete communications solution including local, long distance, and data services.

11. n/a
12. All of XO's packaged services, or "XOptions," are included in XO's tariffs on file with the Commission. XOptions are bundled services, including, based on the specific option chosen, local, long distance, high speed data, and other services, including web hosting; XOptions are available in all the XO Florida markets listed above. Stand alone local and long distance services are also available, at stand alone rates.
13. XO has and will continue to provide information regarding barriers to entry and anticompetitive conduct in other dockets, such as the ongoing collaborative, either on its own behalf or as a member of the Southeastern Competitive Carriers Association, and XO incorporates such comments by reference as though stated herein. In addition, XO notes that the current collaborative is effective at resolving only those issues the ILEC agrees to resolve; a process involving enforcement action, or recommendation to the Commission directly from staff involved with the collaborative, would be more effective and would encourage continued involvement and input from the industry on new and ongoing issues.
14. See answer to 13, supra; XO also has, in the past, sought PSC intervention with ILECs regarding interconnection agreement issues, including filing two arbitration petitions – arbitration of a BellSouth agreement, which has since been resolved, and a current petition seeking arbitration of a Sprint agreement. XO is also still in discussions, post arbitration and/or negotiation, with BellSouth regarding the implementation of the agreement. That XO would be forced to resort to filing arbitration petitions speaks for itself in response to the question of, "Have you experienced any difficulties involving any agreements you may have with incumbent LECs?"
15. See answer to 13, supra.
16. The intrastate revenue for XO affiliates is on file with the Commission; such revenue is not broken out by residential/business, as the residential revenue is de minimus.
17. See Proprietary Exhibit D, attached hereto.
18. No XO affiliate certificated in Florida has made such a filing; XO's parent company, XO Communications, Inc.'s reorganization plan and related approvals from this Commission are on file with the Commission.
19. See Proprietary Exhibit E, attached hereto.
20. XO's current 10K is publicly available at http://www.xo.com/about/investors/financials/xo2003_10k.pdf

XO Florida, Inc.
Attachments to Response to
2003 Local Competition Data
Request

**ALL EXHIBITS ARE
CONFIDENTIAL**