BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF PAMELA A. TIPTON

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 030851-TP

DECEMBER 4, 2003

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH"), AND YOUR BUSINESS ADDRESS.

A. My name is Pamela A. Tipton. I am employed by BellSouth Telecommunications, Inc., as a Director in the Interconnection Services Department. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. I am responsible for implementation of state and federal regulatory mandates for the Local and Access markets, the development of regulatory strategies and the management of the switched services product portfolio.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I received a Bachelor of Arts in Economics from Agnes Scott College in 1986, and a Masters Certification in Project Management from George Washington University in 1996. I have over 15 years experience in telecommunications, with my primary focus in the areas of process development, services implementation, product management, marketing strategy and regulatory policy implementation. I joined Southern Bell in 1987, as a manager in Interconnection Operations, holding several roles over a 5-year period including process development and execution, quality controls and services implementation. In 1994, I became a Sr. Manager with responsibility for End User Access Services and implementation of Virtual and (later) Physical Collocation. In 2000, I became Director, Interconnection Services, responsible for development and implementation of UNE products, and later development of marketing and business strategies. I assumed my current responsibilities in June 2003.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is to address issue numbers 4(a), 4(b), 5(a), 5(b) and 5(e). I identify the geographic markets in BellSouth's territory in Florida where the local switching self-provisioning trigger established by the FCC in its Triennial Order and new rules has been satisfied and where CLECs, therefore, are not impaired without access to unbundled switching. The switching "triggers" are set forth at 47 C.F.R.

§51.319(d)(2)(iii)(A), which states that "a state commission shall find that a requesting telecommunications carrier is not impaired without access to local circuit switching on an unbundled basis in a particular market where either the self-provisioning trigger ... or the competitive wholesale facilities trigger ...is satisfied." My testimony focuses on the self-provisioning trigger. BellSouth is not at this time attempting to make a showing of no impairment based on switching being wholesaled by other providers.

I also provide data identifying the actual deployment that exists in some of those geographic markets where the FCC's triggers are not met. This data supports the conclusion of other BellSouth witnesses that, pursuant to the FCC's "potential deployment" analysis. CLECs are not impaired without access to BellSouth's unbundled local switching in certain markets where the self-provisioning trigger is not met.

ISSUE 4(a): In which markets are there three or more CLECs not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, serving mass market customers with their own switches?

Q. ARE CLECS USING THEIR OWN SWITCHES TO SERVE CUSTOMERS IN FLORIDA?

A. Yes. CLECs have deployed more than 100 switches in Florida, at least 77 of which are serving over 100,000 "mass market" customers. The

definition of "mass market" customers is discussed further below and in more detail in the testimony of BellSouth witness John Ruscilli. Exhibit PAT-1 is a list of CLEC switches deployed in Florida. As described in BellSouth witness Keith Milner's testimony, each switch is capable of serving CLEC customers throughout the entire market (or larger) area.

Q. UNDER WHAT CIRCUMSTANCES IS THE LOCAL SWITCHING SELF-PROVISIONING TRIGGER SATISFIED?

A. 47 C.F.R. § 51.319(d)(2)(iii)(A)(1) states that the local switching self-provisioning trigger is satisfied when "three or more competing providers not affiliated with each other or the incumbent LEC, including intermodal providers of service comparable in quality to that of the incumbent LEC, each are serving mass market customers in the particular market with the use of their own local circuit switches."

Q. WHEN APPLYING THE FCC'S SELF-PROVISIONING SWITCHING TRIGGER, IS IT AS SIMPLE AS COUNTING WHETHER THERE ARE THREE OR MORE ENTITIES SELF-PROVISIONING SWITCHING TO MASS MARKET CUSTOMERS?

A. Yes, as a practical matter, it is that simple. The only qualifications under the FCC's rule are: that the entities used to meet the trigger cannot be affiliated with each other, or with the incumbent local exchange carrier, and that if the self-provisioning entity is an "intermodal" provider, its

service must be comparable in quality to that of the incumbent local exchange carrier. Beyond these two qualifications, satisfaction of the trigger is just dependent upon counting the number of entities self-provisioning switching—if there three or more, the commission must make a finding of "no impairment."

Q. MAY THE COMMISSION LOOK AT SUBJECTIVE EVIDENCE OF IMPAIRMENT IN APPLYING THE SELF-PROVISIONING TRIGGER?

A. No. The FCC's rule makes clear that the self-provisioning trigger is purely objective. The Order also explicitly states that other than the objective count of CLECs, "states shall not evaluate any other factors, such as the financial stability or well-being of the competitive switch providers." Order ¶ 500 (emphasis added).The self-provisioning trigger is straightforward: the Commission must find "no impairment" for unbundled switching when three or more unaffiliated competing carriers are serving mass market customers in a particular market. Order ¶ 501 (emphasis added). This objectivity allows trigger determinations to be made quickly and accurately, and avoids the need for "protracted proceedings." Order ¶ 498.

Q. ARE THERE ANY EXCEPTIONS TO THE RULE?

A. Yes, there is one, but it is not applicable in Florida. In ¶ 503 of the TRO, the FCC said: "In exceptional circumstances, states may identify specific

markets that facially satisfy the self-provisioning trigger, but in which some significant barrier to entry exists such that service to mass market customers is foreclosed even to carriers that self-provision switches." The FCC then gave an example of where this exception would apply, identifying the situation where there was no collocation space available. As Mr. Ruscilli testifies, collocation space is not an issue in Florida. Importantly, even in circumstances where the state commission finds what it believes to be an exceptional source of impairment, it must petition the FCC for a waiver of the application of the trigger.

Q. IN DETERMINING WHERE CLECS MIGHT BE IMPAIRED WITHOUT ACCESS TO BELLSOUTH'S UNBUNDLED SWITCHING, WHAT DETERMINATIONS, OTHER THAN THE TRIGGER ANALYSIS, MUST THE COMMISISON MAKE?

A. The Commission must determine the appropriate geographic markets that will be used to conduct the impairment analysis, and it must determine the appropriate definition of "mass market" customers. BellSouth witness Dr. Chris Pleatsikas testifies that geographic markets should be defined by the UNE rate zones previously identified by this Commission, subdivided by Component Economic Areas (CEA) established by the Bureau of Economic Analysis of the Department of Commerce. BellSouth witness John Ruscilli testifies that, for this proceeding, BellSouth has adopted the FCC's default demarcation cross over point between "mass market" and "enterprise" customers. If a customer location has three or fewer voice

grade equivalent lines served by a particular CLEC, the customer is a "mass market" customer. If the customer location has four or more voice grade equivalent lines served by a particular CLEC, the customer is an "enterprise" customer.

Q. APPLYING THE DEFINITION OF THE GEOGRAPHIC MARKET THAT BELLSOUTH ADVOCATES, HOW MANY DIFFERENT MARKETS ARE THERE IN BELLSOUTH'S FLORIDA SERVICE TERRITORY?

A. There are 31 markets in BellSouth's Florida service area. Attached as Exhibit PAT-2 is a map that shows the 31 separate markets in Florida.

Q. IN HOW MANY OF THESE 31 MARKETS, BECAUSE THE FCC'S SELF-PROVISIONING TRIGGER MET, MUST THIS COMMISSION MAKE A FINDING OF "NO IMPAIRMENT?"

A. The FCC's self-provisioning trigger is met in 13 of the 31 market areas.

Q. PLEASE IDENTIFY THE 13 MARKETS WHERE THE FCC'S SELF-PROVISIONING TRIGGER HAS BEEN MET.

Attached as Exhibit PAT-3 is a list of the 13 markets in Florida where the self-provisioning trigger is met. Attached as Exhibit PAT-4 is a highlighted

map of Florida showing the markets where the self-provisioning trigger is met.

Q. CAN YOU IDENTIFY THE CLECS THAT ARE SELF-PROVISIONING SWITCHING TO SERVE MASS MARKET CUSTOMERS IN THE MARKETS THAT YOU HAVE IDENTIFIED AS MEETING THE TRIGGER?

A. Yes. Attached as Exhibit PAT-5 is a list of the CLECs that are using their own switching to serve mass-market customers in the market areas that I have identified as meeting the trigger. BellSouth requests that Exhibit PAT-5 be treated as confidential because while this Commission needs to know where CLECs have self-provisioned switching serving mass-market customers, these locations and the identity of the CLECs' customers are proprietary and it is very important to these CLECs that this information not be made available to their competitors. I know that this Commission has issued a protective order related to this material, but BellSouth also has been required to sign separate confidentiality agreements with a number of CLECs, promising that this material would not be used by, or given to, BellSouth's marketing organization, for obvious reasons.

Q. WHERE DID BELLSOUTH OBTAIN THE INFORMATION UPON WHICH YOU BASE YOUR CONCLUSIONS ABOUT WHETHER THE FCC's

SELF-PROVISIONING TRIGGER IS MET IN A PARTICULAR GEOGRAPHIC MARKET?

A. We have relied both on information obtained from the CLECs and on data that is available from BellSouth's records. We asked CLECs to identify the market areas where they serve mass-market customers using their own switching. Unfortunately, although a few were cooperative and provided that information, most of the CLECs objected to providing the information, claiming that BellSouth had such information in its possession already. BellSouth thus relied on the information it had for those CLECs.

Q. WHAT DID YOU ASK THE CLECS TO PROVIDE TO BELLSOUTH?

A. We asked the CLECs to identify the switches that they owned, and to tell us where they were providing service to customers using those switches. We asked the CLECs to identify customer locations by BellSouth wire center serving area and by the number of CLEC lines provided to each location, ranging from 1 line up to more than 10 lines. Some CLECs, including FDN and AllTel, provided us with useful information and we have used that information to determine the areas where the self-provisioning trigger is satisfied.

Q. CAN YOU TELL US WHAT YOU DID ABOUT THE CLECS WHO OWN THEIR OWN SWITCHES, BUT WHO DID NOT PROVIDE YOU WITH

THE INFORMATION YOU REQUESTED?

A. Yes. For CLECs that objected to providing the information, claiming that we had such information in our possession, we used the data that we had available to us to determine the total number and the location of the mass market customers. We used one method to identify residential customers and another method to identify business customers.

With regard to residential customers, we identified all telephone numbers that had been "ported" from BellSouth to another carrier. The fact that the number was "ported" meant that the customer is being served by another telecommunications provider who had access to a switch that it either self-provided or obtained from another carrier. Our database reflects the carrier to whom the number was ported. We compared these ported residential numbers against BellSouth's directory listing database. The purpose of doing this was to confirm that we were including only residential numbers and to obtain an address for the ported number. We identified "residential" customers by looking at their service classifications in the Directory Listings database. We then sorted the ported "residential" numbers by address, so that we could determine how many CLEC lines were provided at that particular address to ensure that we excluded customer locations with more than three lines, such as nursing homes (because BellSouth is using 3 or fewer lines as the demarcation point to designate "mass market" customers). I would note that this method has the clear tendency to understate the number of customers served by

CLECs because it does not capture the customers to whom BellSouth has never provided local service or those who abandoned their BellSouth number and obtained a new number provided by a CLEC.

Q. WHAT METHOD DID YOU USE TO IDENTIFY THE BUSINESS CUSTOMERS THAT ARE SERVED BY A SELF-PROVISIONED CLEC SWITCH?

A. Except for those customers who went to a carrier that is using solely its own facilities, like the cable companies, most customers who are served by a CLEC that is self-provisioning switching are served via a UNE loop that the CLEC leases from BellSouth. Our loop inventory database contains a class of service indicator. Therefore, we extracted a list of all business class loops from BellSouth's database. From this database, we learned the identity of the CLECs who lease UNE loops and the service address where each loop terminates. We grouped the business class service addresses, and identified those service addresses where there were three or fewer loops terminated. By matching those locations to the geographic markets we had identified, we could determine how many CLECs were providing local service to mass-market customers in each of the geographic markets.

Q. WOULD THE LOOP RECORDS HAVE ALLOWED YOU TO IDENTIFY BOTH "RESIDENTIAL" AND "BUSINESS" MASS MARKET CUSTOMERS

THAT ARE BEING SERVED BY A SELF-PROVISIONED CLEC SWITCH?

A. No. The loop records would not have allowed us to identify carriers who provide service using solely their own facilities, such as cable companies, who generally only provide service to residential subscribers. In cases where facilities-based providers would not provide the information we requested to determine if it is self-provisioning switching, using ported numbers was the only way to identify customers being served by those carriers.

Q. WHAT IS AN "INTERMODAL" PROVIDER OF TELECOMMUNICATIONS SERVICE?

A. As defined by the FCC, "[t]he term intermodal refers to facilities or technologies other than those found in traditional telephone networks, but that are utilized to provide competing services. Intermodal facilities or technologies include, but are not limited to, traditional or new cable plant, wireless technologies, and power line technologies." 47 C.F.R. § 51.5.

Q. HAVE YOU RELIED UPON INTERMODAL PROVIDERS OF TELEPHONE SERVICE IN ORDER TO MEET THE TRIGGERS IN THE 13 MARKETS YOU HAVE IDENTIFIED?

A. We only relied upon an intermodal provider (cable company) to meet the trigger in one of the 13 markets where the trigger is satisfied (UNE zone 3 in the Jacksonville CEA). While a cable company is providing service in 7 of the 13 geographic markets where the trigger is met, in all but one of them, there are at least 3 other providers.

Q. IS THE LOCAL TELECOMMUNICATIONS SERVICE BEING PROVIDED BY THE CABLE COMPANY THAT YOU ARE COUNTING TO SATISFY THE SELF-PROVISIONING TRIGGER IN THAT ONE MARKET COMPARABLE IN QUALITY TO BELLSOUTH'S LOCAL SERVICE?

A. Yes. In fact, the cable company touts its service as providing a "cleaner" signal with "less noise and distortion" than traditional analog telephone service. The fact that this company has captured a significant number of customers in the Florida markets where it provides service demonstrates that consumers view its service as at least comparable in quality to BellSouth's service.

Q. HAVE YOU PROVIDED THE PRECISE CUSTOMER LOCATION FOR EACH OF THE CUSTOMERS OF THE CLECS WHO ARE SELF-

PROVISIONING SERVICE?

A. No, because that is not necessary. We have identified the UNE Zones further subdivided by Component Economic Areas in which these customers are located. As BellSouth witness Keith Milner discusses in greater detail in his testimony, the CLECs have made it clear that their networks are not configured like BellSouth's, and that they are relying on fewer switches and more transport to serve their customers. AT&T and MCI have stated in proceedings before this Commission that they can serve any customer in BellSouth's geographic service area with their existing switches. Given that, the actual physical location of the individual end users in each market area is not relevant. If the CLECs have chosen to serve certain customers in BellSouth's market areas, according to the CLECs, they can serve any customers in those market areas.

ISSUE 4(b): In which markets are there two or more CLECs not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, who have their own switches and are offering wholesale local switching to customers serving DS0 capacity loops in that market?

Q. HAS BELLSOUTH IDENTIFIED TWO OR MORE CARRIERS IN A MARKET WHO HAVE THEIR OWN SWITCHES AND ARE OFFERING

WHOLESALE LOCAL SWITCHING TO CUSTOMERS SERVING DS0 CAPACITY LOOPS IN THAT MARKET?

A. No.

ISSUE 5(a): In which markets are there either two wholesale providers or three self-provisioners of local switching not affiliated with each other or the ILEC, serving end users using DS1 or higher capacity loops? Where there are, can these switches be used to serve DS0 capacity loops in an economic fashion?

ISSUE 5(b): In which markets are there any carriers with a self-provisioned switch, including an intermodal provider of service comparable in quality to that of the ILEC, serving end users using DS0 capacity loops? and

ISSUE 5(e): Taking into consideration the factors in 5(a) through (d), in what markets is it economic for CLECs to self-provision local switching and CLECs are thus not impaired without access to unbundled local switching?

Q. IN DR. ARON'S TESTIMONY, SHE IDENTIFIES AN ADDITIONAL 10 GEOGRAPHIC MARKETS IN FLORIDA WHERE THE FCC'S TRIGGERS ARE NOT MET, BUT WHERE BELLSOUTH HAS CONCLUDED THAT CLECS ARE NOT IMPAIRED WITHOUT ACCESS TO UNBUNDLED SWITCHING BASED ON THE FCC'S "POTENTIAL DEPLOYMENT"

METHODOLOGY. DO YOU HAVE INFORMATION REGARDING ACTUAL CLEC DEPLOYMENT IN THOSE MARKETS?

A. Yes, I do. In addition to the FCC's triggers tests, the FCC provided that there could be other circumstances in which a CLEC would not be impaired without access to an incumbent's unbundled switching. The FCC instructed the state commissions to look at those geographic markets that did not meet either of the triggers tests, and to evaluate those markets based on the actual competition that exists, also considering any operational or economic barriers that might exist.

Specifically, the FCC states that competitive switching serving customers in the *enterprise* market is a "significant indicator of the possibility of serving the mass market because of the demonstrated scale and scope economies of serving numerous customers in a wire center using a single switch." ¶ 508. The FCC further states that "to the extent there is a switch in an area serving the local exchange mass market, this fact must be given particularly substantial weight." ¶ 510.

With respect to the 10 markets where the trigger is not met, but where BellSouth has concluded that CLECs are not impaired, I have information related to the actual deployment that exists in 7 of those 10 markets. Specifically, either one or two CLECs are serving mass-market customers using their own switches in seven of those 10 geographic markets where BellSouth's impairment model analysis shows that CLECs are not

impaired without access to BellSouth's unbundled switching. Those markets are listed in Exhibit PAT-6. In Exhibit PAT-7, I identify, for the seven areas, the CLECs that are providing service using their own switches. Exhibit PAT-7 contains proprietary confidential business information (just as did my earlier exhibit that identified CLECs serving specific geographic areas).

Q. CAN YOU SUMMARIZE YOUR TESTIMONY?

A. Yes. The FCC has created a "bright line" test for impairment with regard to unbundled switching. Where there are three or more unaffiliated CLECs providing switching in the relevant geographic areas using their own switch, the Commission must conclude that CLECs are not impaired without access to the incumbent local exchange carrier's switch, end of inquiry. In Florida, a number of CLECs are providing service to mass market customers using their own switches and I have identified 13 areas where the self provisioning switching trigger is met. Indeed, for most of the market areas I identified where the trigger is met, there are more than three such CLECs. There are often five or six different providers. CLECs are not impaired in those market areas without access to BellSouth's unbundled switching and the Commission must, therefore, make a finding of "no impairment" for those areas. Moreover, there are seven other areas where, although there is not enough actual competition to meet the FCC's switching triggers, we have found CLECs providing service to mass market customers using their own switches. The fact of actual

deployment in these markets must be given substantial weight in determining lack of impairment. Finally, it is likely that with cooperation from a greater number of CLECs in providing data, the facts will show that CLECs are serving a greater number of customers, in more markets, than those set forth in my testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

CLEC Switches Deployed in Florida

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Exhibit PAT-1

CLEC NAME	SWITCH LOCATION STREET ADDRESS	SWITCH LOCATION CITY	SWITCH CLLI
INTERMEDIA COMMUNICATIONS INC. - FL	838 S DIXIE HWY	BOCA RATON	BCRTFLMARS0
INTERMEDIA COMMUNICATIONS INC. - FL	221 SE 4TH ST	BOYNTON BEACH	BYBHFLMARS5
IDS TELCOM LLC	1080 NW 163RD DR	MIAMI	COCYFL10DS1
ITC DELTA COM - FL	6037 W ATLANTIC AVE	DELRAY BEACH	DLBHFLKPRS3
INTERMEDIA COMMUNICATIONS INC. - FL	780 S DEERFIELD AVE	DEERFIELD BEACH	DRBHFLMARS0
DAYTONA TELEPHONE COMPANY	315 N SEGRAVE ST	DAYTONA BEACH	DYBHFL0500T
AT&T LOCAL	FL HWY 18 & 1-75	ELLISVILLE	ELVLFLMADS0
AT&T LOCAL	FL HWY 18 & 1-75	ELLISVILLE	ELVLFLMADS0
AT&T LOCAL	FL HWY 18 & 1-75	ELLISVILLE	ELVLFLMADS0
KMC TELECOM III, INC. - FL	7891 SEARS BLVD	ENSLEY	ESLYFL0100W
KMC TELECOM III, INC. - FL	7891 SEARS BLVD	ENSLEY	ESLYFL01DS0
FLORIDA DIGITAL NETWORK	201 NE 24TH ST	FORT LAUDERDALE	FTLDFL92DS0
FLORIDA DIGITAL NETWORK	201 NE 24TH ST	FORT LAUDERDALE	FTLDFL92DS0
AT&T LOCAL	1352 NW 40TH AVE	FORT LAUDERDALE	FTLDFLOVDS0
AT&T LOCAL	1352 NW 40TH AVE	FORT LAUDERDALE	FTLDFLOVDS0
AT&T LOCAL	1352 NW 40TH AVE	FORT LAUDERDALE	FTLDFLOVDS0
AT&T LOCAL	1340 NW N.W. 40TH AVE	FORT LAUDERDALE	FTLDFLOVDS2
TCG SOUTH FLORIDA	1340 NW 40TH AVE	FT. LAUDERDALE	FTLDFLOVDS3
TCG SOUTH FLORIDA	1340 NW 40TH AVE	FT. LAUDERDALE	FTLDFLOVDS3
XSPEDIUS MANAGEMENT CO SW SVCS JACKSONVILLE FL	100 NE 3RD AVE	FORT LAUDERDALE	FTLDFLTADC0
XSPEDIUS MANAGEMENT CO SW SVCS JACKSONVILLE FL	100 NE 3RD AVE	FORT LAUDERDALE	FTLDFLTADC0
INTERMEDIA COMMUNICATIONS INC. - FL	NE 2ND AVE & E BROWARD BLVD	FORT LAUDERDALE	FTLDFLTNRS0
FLORIDA DIGITAL NETWORK	200 N ANDREWS AVE	FORT LAUDERDALE	FTLDFLWADS1
ITC DELTA COM - FL	98 MCCLURE DR	GULF BREEZE	GLBRFLMCRS0
KMC TELECOM III, INC. - FL	1640 STATE AVE	HOLLY HILL	HLHLFL0200W
KMC TELECOM III, INC. - FL	1640 STATE AV	HOLLY HILL	HLHLFL02DS0
INTERMEDIA COMMUNICATIONS INC. - FL	TAFT ST & N FEDERAL HWY	HOLLYWOOD	HLWDFLEDRS0
INTERMEDIA COMMUNICATIONS INC. - FL	STATE & KINGMAN RD.	HOMESTEAD	HMSTFLTERS1
AT&T LOCAL	424 PEARL ST	JACKSONVILLE	JCVLFLCLDS2
AT&T LOCAL	424 PEARL ST	JACKSONVILLE	JCVLFLCLDS2
AT&T LOCAL	424 PEARL ST	JACKSONVILLE	JCVLFLCLDS2
AT&T LOCAL	424 N PEARL ST	JACKSONVILLE	JCVLFLCLDS3
AT&T LOCAL	424 N PEARL ST	JACKSONVILLE	JCVLFLCLDS3
TCG SOUTH FLORIDA	424 N PEARL ST	JACKSONVILLE	JCVLFLCLDS6
BUSINESS TELECOM INC. - FL	121 W FORSYTH ST SUITE 100	JACKSONVILLE	JCVLFLCODS0
TCG SOUTH FLORIDA	5934 RICHARD RD	JACKSONVILLE	JCVLFLGHDS0
NEWSOUTH COMMUNICATIONS CORP	421 W CHURCH ST STE 701	JACKSONVILLE	JCVLFLJBDS0
NEWSOUTH COMMUNICATIONS CORP	421 W CHURCH ST STE 701	JACKSONVILLE	JCVLFLJBDS0
FLORIDA DIGITAL NETWORK	3986 BLVD CENTER DR	JACKSONVILLE	JCVLFLKJDS0

Source: Local Exchange Routing Guide

CLEC Switches Deployed in Florida

CLEC NAME	SWITCH LOCATION STREET ADDRESS	SWITCH LOCATION CITY	SWITCH CLLI
XSPEDIUS MANAGEMENT CO SW SVCS JACKSONVILLE FL	200 W FORSYTH ST	JACKSONVILLE	JCVLFLWFDC0
XSPEDIUS MANAGEMENT CO SW SVCS JACKSONVILLE FL	200 W FORSYTH ST	JACKSONVILLE	JCVLFLWFDC0
INTERMEDIA COMMUNICATIONS INC. - FL	7020 A C SKINNER PKY	JACKSONVILLE	JCVMFLEDDS0
ALLTEL COMMUNICATIONS, INC. - FL	601 RIVERSIDE AVE	JACKSONVILLE	JCVMFLLRDSA
US LEC OF FLORIDA, INC.	6410 SOUTHPOINT PKY	JACKSONVILLE	JCVMFLUFDS0
US LEC OF FLORIDA, INC.	6410 SOUTHPOINT PKY	JACKSONVILLE	JCVMFLUFDS0
ADELPHIA BUSINESS SOLUTIONS OF JACKSONVILLE, INC.	6263 PHILLIPS HWY	JACKSONVILLE	JCVNFL07DS0
SBC TELECOM, INC. - FL	6500 BOWDEN RD	JACKSONVILLE	JCVNFL96DS0
INTERMEDIA COMMUNICATIONS INC. - FL	365 INTERNATIONAL PKY	LAKE MARY	LKMRFLMARS1
MCIMETRO, ATS, INC.	150 SE 2ND AVE	MIAMI	MIAMFLDADS0
MCIMETRO, ATS, INC.	150 SE 2ND AVE	MIAMI	MIAMFLDADS0
WINSTAR COMMUNICATIONS, LLC - FL	150 SE 2ND AVE	MIAMI	MIAMFLDADS2
FOCAL COMMUNICATIONS CORP OF FLORIDA	701 BRICKELL AVE	MIAMI	MIAMFLDIDS1
GLOBAL NAPS, INC. - FL	100 S BISCAYNE BLVD	MIAMI	MIAMFLKYDS0
GLOBAL NAPS, INC. - FL	100 S BISCAYNE BLVD	MIAMI	MIAMFLKYDS0
INTERMEDIA COMMUNICATIONS INC. - FL	1907 NW 87TH ST	MIAMI	MIANFLWKDS0
PAETEC COMMUNICATIONS, INC. - FL	100 N BISCAYNE BLVD @ USE MIAMFL98	MIAMI	MIANFLYIDS6
US LEC OF FLORIDA, INC.	5301 BLUE LAGOON DR	MIAMI	MIAPFLYODS0
US LEC OF FLORIDA, INC.	5301 BLUE LAGOON DR	MIAMI	MIAPFLYODS0
XO FLORIDA, INC.	16565 B NW 15TH ST	MIAMI	MIAQFL06DS0
LEVEL 3 COMMUNICATIONS, LLC - FL	49 NW 5TH ST	MIAMI	MIATFLADDS0
POINTECOM, INC. - FL	99 S. E. 5TH STREET	MIAMI	MIAUFLAZDS0
ITC DELTA COM - FL	6749 RAVINE ST	MILTON	MLTNFLRARS0
TIME WARNER COMMUNICATIONS AXS FLORIDA - ORLANDO	2251 LUCIEN WAY	MAITLAND	MTLDFLAPDS0
TIME WARNER COMMUNICATIONS AXS FLORIDA - ORLANDO	2251 LUCIEN WAY	MAITLAND	MTLDFLAPDS0
US LEC OF FLORIDA, INC.	258 SOUTHHALL LN	MAITLAND	MTLDFLBRDS0
US LEC OF FLORIDA, INC.	258 SOUTHHALL LN	MAITLAND	MTLDFLBRDS0
01 COMMUNICATIONS, INC. - FL	1101 S KELLER RD	MAITLAND	MTLDFLDQDS0
INTERMEDIA COMMUNICATIONS INC. - FL	NW 27TH AVE & NE 188TH ST	NORTH DADE	NDADFLAARS0
TCG SOUTH FLORIDA	990 NE 125 TH ST	NORTH MIAMI	NMIAFLAYDS0
TCG SOUTH FLORIDA	990 NE 125 TH ST	NORTH MIAMI	NMIAFLAYDS0
TCG SOUTH FLORIDA	990 NE 125 TH ST	NORTH MIAMI	NMIAFLAYDS0
TCG SOUTH FLORIDA	990 NE 125 TH ST	NORTH MIAMI	NMIAFLAYDS0
AT&T LOCAL	460 NE 215 ST	OJUS	OJUSFLTLDS2
AT&T LOCAL	460 NE 215 ST	OJUS	OJUSFLTLDS2
AT&T LOCAL	460 NE 215 ST	OJUS	OJUSFLTLDS2
AT&T LOCAL	460 NE 215 ST	OJUS	OJUSFLTLDS2
GRANDE COMMUNICATIONS NETWORKS, INC. - FL	100 S LUCERNE CIR W	ORLANDO	ORLDFL60OMD
GLOBAL NAPS, INC. - FL	390 N ORANGE AVE	ORLANDO	ORLDFLAC2MD

Source: Local Exchange Routing Guide

CLEC Switches Deployed in Florida

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Florida Public Service Commission
Docket No. 030851-TP
Exhibit PAT-1

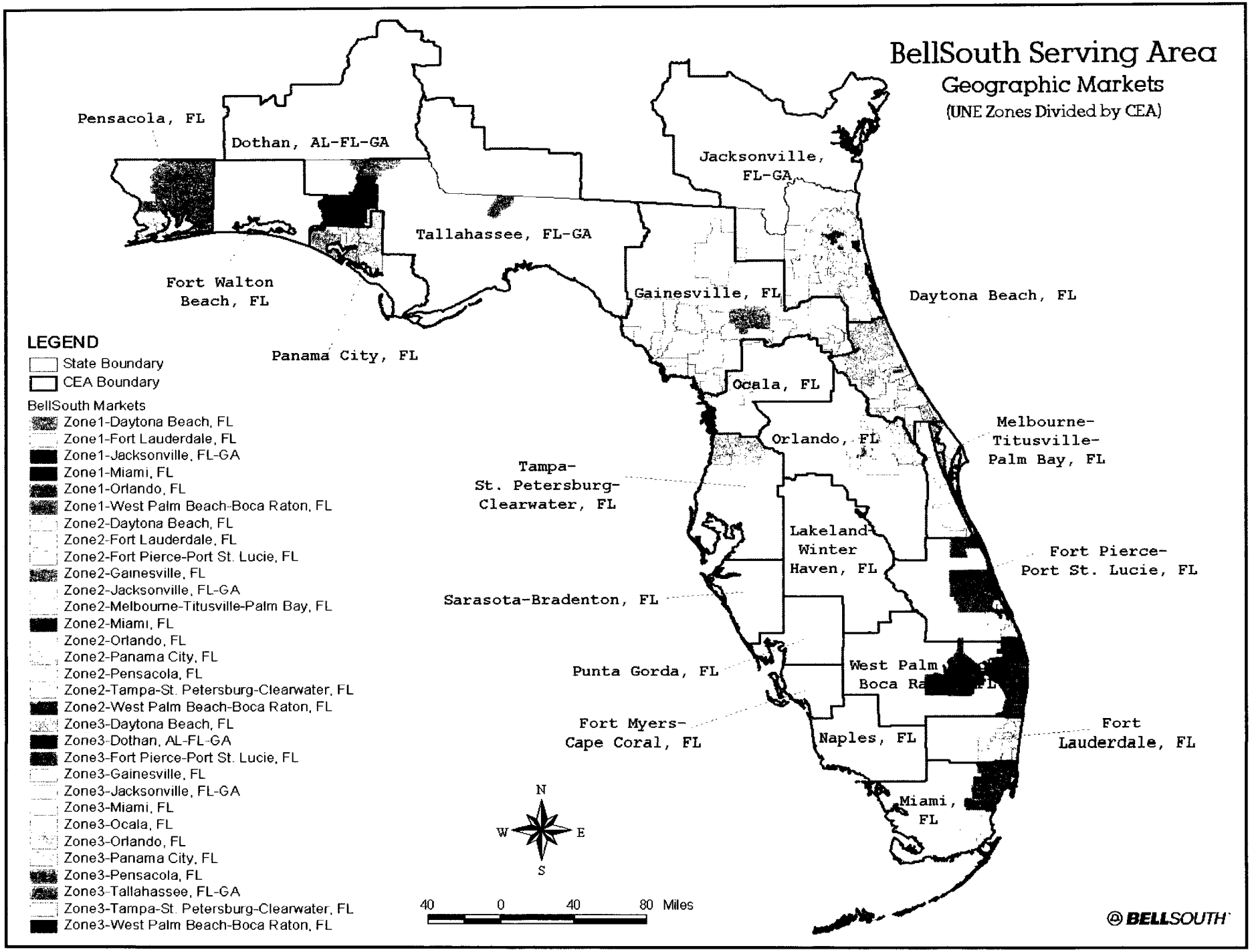
CLEC NAME	SWITCH LOCATION STREET ADDRESS	SWITCH LOCATION CITY	SWITCH CLLI
FLORIDA DIGITAL NETWORK	390 N ORANGE AVE	ORLANDO	ORLDFLACDS0
GRANDE COMMUNICATIONS NETWORKS, INC. - FL	100 W LUCERNE CIR @ (USE ORLDFL60)	ORLANDO	ORLDFLLUDS0
XO FLORIDA, INC.	45 N MAGNOLIA AVE	ORLANDO	ORLDFLMA02Z
AT&T LOCAL	45 N MAGNOLIA AVE	ORLANDO	ORLDFLMADS3
AT&T LOCAL	45 N MAGNOLIA AVE	ORLANDO	ORLDFLMADS3
AT&T LOCAL	45 N MAGNOLIA AVE	ORLANDO	ORLDFLMADS3
AT&T LOCAL	45 N MAGNOLIA AVE	ORLANDO	ORLDFLMADS5
PAETEC COMMUNICATIONS, INC. - FL	45 N MAGNOLIA AVE	ORLANDO	ORLDFLMAXOX
INTERMEDIA COMMUNICATIONS INC. - FL	111 N ORANGE AVE	ORLANDO	ORLDFLOEDS0
BUSINESS TELECOM INC. - FL	201 S ORANGE AVE	ORLANDO	ORLDFLSODS0
MCIMETRO, ATS, INC.	250 S. ORANGE AVE	ORLANDO	ORLDFLXHDS0
ORLANDO TEL CO AFFIL WITH ORLANDO BUS TEL SYSTMS	4558 35TH ST	ORLANDO	ORLEFLGPDS0
TCG SOUTH FLORIDA	1151 N KELLER RD	ORLANDO	ORLEFLGVDS0
TCG SOUTH FLORIDA	1151 N KELLER RD	ORLANDO	ORLEFLGVDS0
LEVEL 3 COMMUNICATIONS, LLC - FL	380 LK DESTINY RD	ORLANDO	ORLFFLEJDS0
LEVEL 3 COMMUNICATIONS, LLC - FL	380 LAKE DESTINY RD	ORLANDO	ORLFFLEJDS4
SBC TELECOM, INC. - FL	8350 PARKLINE BLVD	ORLANDO	ORLFFLYLDS0
INTERMEDIA COMMUNICATIONS INC. - FL	BLANDING & FILLMORE	ORANGE PARK	ORPKFLRWRS3
FLORIDA CONSOLIDATED MULTI-MEDIA SVCS, INC. - FL	100 RIVERWIND WAY	OVIEDO	OVIDFL07DS0
INTERMEDIA COMMUNICATIONS INC. - FL	84 S CENTRAL AVE	OVIEDO	OVIDFLCARS0
ITC DELTA COM - FL	84 S CENTRAL AVE	OVIEDO	OVIDFLCARS1
US LEC OF FLORIDA, INC.	7121 FAIRWAY DR	PALM BEACH GARDENS	PBGRFLEZDS0
KMC TELECOM III, INC. - FL	2300 COMMERCE PARK DR NE	PALM BAY	PLBYFLAO00W
KMC TELECOM III, INC. - FL	2300 COMMERCE PARK DR NE	PALM BAY	PLBYFLAODS0
SBC TELECOM, INC. - FL	2500 N ANDREWS AVENUE EXT	POMPANO BEACH	PMBHFL99DS0
INTERMEDIA COMMUNICATIONS INC. - FL	9420 ROYAL PALM BLVD	POMPANO BEACH	PMBHFLCSRS2
MCIMETRO, ATS, INC.	599 SW 16TH TER	POMPANO BEACH	PMBHFLDRDS0
MCIMETRO, ATS, INC.	599 SW 16TH TER	POMPANO BEACH	PMBHFLDRDS0
TCG SOUTH FLORIDA	141 NW 16TH ST	POMPANO BEACH	PMBHFLEDDS0
TCG SOUTH FLORIDA	141 NW 16TH ST	POMPANO BEACH	PMBHFLEDDS0
TCG SOUTH FLORIDA	141 NW 16TH ST	POMPANO BEACH	PMBHFLEDDS0
INTERMEDIA COMMUNICATIONS INC. - FL	1180 BANKS RD	POMPANO BEACH	PMBHFLMARS1
KNOLOGY OF FLORIDA, INC.	1795 INDUSTRIAL DR	PANAMA CITY	PNCYFLDARS1
NETWORK TELEPHONE CORPORATION - FL	30 W BELMONT ST	PENSACOLA	PNSCFLBLDS2
NETWORK TELEPHONE CORPORATION - FL	30 W BELMONT ST	PENSACOLA	PNSCFLBLDS2
INTERMEDIA COMMUNICATIONS INC. - FL	EUREKA DR & USHWY 1	PERRINE	PRRNFLCCRS0
FLORIDA DIGITAL NETWORK	829 ORANGE AVE	PORT ORANGE	PTORFLACDS0
ITC DELTA COM - FL	501 W 9TH ST	SANFORD	SNFRFLMARS2
INTERMEDIA COMMUNICATIONS INC. - FL	69 CORDOVA ST	ST AUGUSTINE	STAGFLMARS0

Source: Local Exchange Routing Guide

CLEC Switches Deployed in Florida

CLEC NAME	SWITCH LOCATION STREET ADDRESS	SWITCH LOCATION CITY	SWITCH CLLI
KMC TELECOM III, INC. - FL	8230 E BROADWAY AVE	TAMPA	TAMSFLZKDS1
ADELPHIA BUSINESS SOLUTIONS OF FLORIDA, LLC	2121 W PROSPECT RD	TAMARAC	TMRCFL03DS0
ADELPHIA BUSINESS SOLUTIONS OF FLORIDA, LLC	2121 W PROSPECT RD	TAMARAC	TMRCFL03DS0
AT&T LOCAL	1717 S APOPKA VINELAND RD	WINDERMERE	WNDRFLTLDS0
NEWSOUTH COMMUNICATIONS CORP	200 AVE B	WINTER HAVEN	WNHNFLBUDS0
INTERMEDIA COMMUNICATIONS INC. - FL	436 GARDENIA ST	WEST PALM BEACH	WPBHFL58RS0
AT&T LOCAL	325 GARDENIA ST	WEST PALM BEACH	WPBHFLANDS1
AT&T LOCAL	325 GARDENIA ST	WEST PALM BEACH	WPBHFLANDS1
AT&T LOCAL	325 GARDENIA ST	WEST PALM BEACH	WPBHFLANDS1
ITC DELTA COM - FL	1475 CENTREPARK BLVD	WEST PALM BEACH	WPBIFLJADS3
ITC DELTA COM - FL	1475 CENTREPARK BLVD	WEST PALM BEACH	WPBIFLJADS4

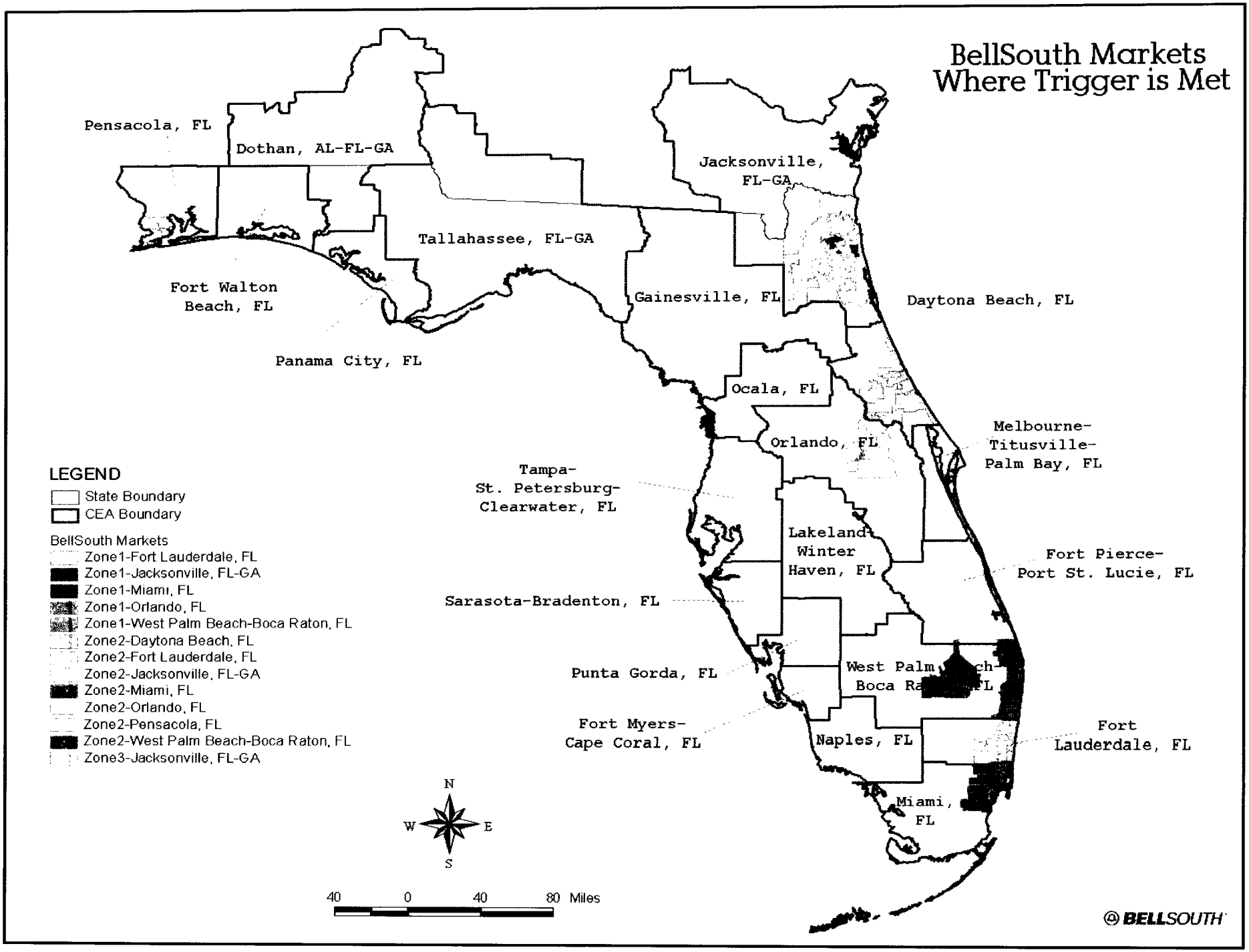
Source: Local Exchange Routing Guide



BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Exhibit PAT-2

Markets Where Self-Provisioning Trigger is Met

UNE Zone	CEA
Zone 1	Jacksonville FL - GA
Zone 2	Jacksonville FL - GA
Zone 3	Jacksonville FL - GA
Zone 1	Orlando FL
Zone 2	Orlando FL
Zone 1	Miami FL
Zone 2	Miami FL
Zone 1	Fort Lauderdale FL
Zone 2	Fort Lauderdale FL
Zone 1	West Palm Beach-Boca Raton FL
Zone 2	West Palm Beach-Boca Raton FL
Zone 2	Pensacola FL
Zone 2	Daytona Beach FL



BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Exhibit PAT-4

CLECS THAT MEET SELF-PROVISIONING TRIGGER (BASED ON CURRENTLY AVAILABLE DATA)

MARKET	CLEC
Daytona Beach, FL Zone2	1
	2
	3
	4
Fort Lauderdale, FL Zone1	1
	2
	3
	4
	5
	6
	7
	8
Fort Lauderdale, FL Zone2	1
	2
	3
	4
	5
	6
	7
	8
	9
	10
	11
Jacksonville, FL-GA Zone1	1
	2
	3
	4
	5
	6
Jacksonville, FL-GA Zone2	1
	2
	3
	4
	5
	6
	7
	8
	9
Jacksonville, FL-GA Zone3	1
	2
	3
Miami, FL Zone1	1
	2
	3
	4
	5
	6
	7
	8
	9

Miami, FL Zone2	1
	2
	3
	4
	5
	6
	7
Orlando, FL Zone1	1
	2
	3
	4
Orlando, FL Zone2	1
	2
	3
	4
	5
	6
	7
Pensacola, FL Zone2	1
	2
	3
West Palm Beach-Boca Raton, FL Zone1	1
	2
	3
	4
	5
	6
West Palm Beach-Boca Raton, FL Zone2	1
	2
	3
	4
	5
	6

Markets With Actual CLEC Deployment Where Triggers Not Met

Zone	CEA
Zone 2	Fort Pierce-Port St. Lucie FL
Zone 2	Gainesville FL
Zone 2	Melbourne-Titusville-Palm Bay FL
Zone 2	Panama City FL
Zone 3	Fort Pierce-Port St. Lucie FL
Zone 3	Miami FL
Zone 3	West Palm Beach-Boca Raton FL

CLECs With Actual Deployment In Markets Where Triggers Not Met