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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: December 29, 2003
)

AT&T'S RESPONSES TO STAFF'S
SECOND SET OF INTERROGATORIES (NOS. 8-11)
REDACTED

Subject to the General Objections filed with the Florida Public Service Commission on or about December 15, 2003, AT&T Communications of the Southern States, LLC and TCG South Florida (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, submits the following Responses to Florida Public Service Commission Staff's (hereinafter "FPSC Staff") Second Set of Interrogatories to AT&T Communications of the Southern States, LLC, served on December 8, 2003, as follows:

DOCUMENT NUMBER 030851-TP

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FPSC-COMMISSIONER CLEER

REQUEST: Staff's Second Set of Interrogatories

DATED: December 8, 2003

Interrogatory 8 (a): For all switches that you have provisioned in the State of Florida, please identify from which switches you also have self-provisioned local loops to one or more end users.

Response: AT&T has self-provisioned high capacity (DS3 and above) local loops from each of its 6 local switches in Florida. See Attachment 1.

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Interrogatory 8(b): For those switches identified in response to (a), please identify the capacity of the loops self-provisioned and the number of each loop type provisioned to end users.

Response: All self provisioned loops are provisioned at the DS3 level and are OC-n fiber facilities.

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Interrogatory 8(c): For those loops identified in response to (b), please state the terms, conditions, and rates under which your company is providing the loop in conjunction with the switching component.

Response: The terms, conditions and rates under which AT&T provides the loop and switching component are as detailed in the end-user tariffs.

For further information, see:

<http://ccpkms.ims.att.com/tariffs/index.html>

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Interrogatory 8(d): For those switches identified in response to (a), please identify the switch name and its current software release.

Response: See Attachment 1. Lucent 5ESS switches are using the current software release 5E16.2. Nortel DMS switches are using NCS-15, and the Lucent 4E's are using 4E28.

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Interrogatory 8(e): For those switches identified in response to (a), are there any features being offered by the ILEC in the wire centers served by this switch that your switch is incapable of providing?

Response: The switches identified in response to (a) are capable of supporting all the features and functions consistent with the software releases cited above. AT&T cannot affirmatively identify all features being offered by the ILEC in wire centers served by these switches, therefore cannot state with certainty whether or not there are features offered by the ILEC which AT&T switches are not capable of providing.

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Interrogatory 8(f): If the response to (e) is affirmative, please identify what features cannot be provided, what classes of customers use such features, and what actions would be necessary in order to provide these features.

Response: Not applicable

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Interrogatory 8(g): For those switches identified in response to (a), please identify the anticipated year of retirement.

Response: No plans exist for retirement of these switches at this time.

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Interrogatory 8(h): For those switches identified in response to (a), please describe any existing plans to upgrade the switch's capacity or to implement software upgrades.

Response: At present, there are no plans to upgrade switch capacity of these switches. Plans for software upgrades upon release of newer versions.

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Interrogatory 8(i): For those switches identified in response to (a), will you provide wholesale switching capacity to another CLEC?

Response: No, AT&T does not provide wholesale switching capacity to another CLEC, however, two (2) switches identified in response to (a) (line 1 and line 6) are used only to provide service to Comcast, but do not represent the provisioning by AT&T of wholesale switching.

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End Confidential - Subject To Protective Order XXX.**

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Interrogatory 8(j): If the response to (i) is affirmative, please identify the terms, conditions, and rates you would require of a wholesale customer, including contract terms and take or pay requirements, and state whether your company will ensure that the calling scopes and features that are offered to wholesalers will be the same that the ILEC offers.

Response: Not applicable

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Interrogatory 8(k): If the response to (i) is affirmative, please identify the operational support system interface capabilities, including version number and a copy of the methods and procedures, that your company uses or will use when offering unbundled local switch capability to CLECs in the State of Florida.

Response: Not applicable.

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Interrogatory 8(l): If the response to (i) is affirmative, do you currently provide wholesale switching capacity to another CLEC?

Response: Not applicable.

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Interrogatory 8(m): If the response to (l) is affirmative, please identify to what CLECs you currently provide wholesale switching and the switch used.

Response: Not applicable.

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Interrogatory 8(n): If the response to (l) is affirmative, please state your company's mean time to repair and other response intervals for servicing existing switches.

Response: Not applicable.

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Interrogatory 8(o): If the response to (i) is affirmative, please state your company's signaling capability and signaling redundancy that will be used in making available unbundled local switching to CLECs in the State of Florida.

Response: Not applicable.

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Interrogatory 8(p): If the response to (i) is affirmative, please describe your company's methods and procedures to prevent or minimize service degradation, including but not limited to delay and/or echo return loss attenuation, to a CLEC that utilizes your company's unbundled local switching in Florida.

Response: Not applicable.

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Interrogatory 8(q): If the response to (i) is affirmative, will your company also make available transport as a stand-alone service to CLECs within the State of Florida?

Response: Not applicable

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DATED: December 8, 2003

Interrogatory 8(r): If the response to (i) is affirmative, will your company make transport available in conjunction with the provision of unbundled local switching capacity to CLEC?

Response: Not applicable

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Interrogatory 8(s): What is the total available capacity on your company's network to provide transport?

Response: See response to (i).

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Interrogatory 8(t): If the response to (i) is affirmative, under what rates, terms, and conditions are you willing to provide transport in conjunction with the provision of unbundled local switching capacity to CLECs in Florida?

Response: Not applicable

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Interrogatory 8(u): For those loops identified in response to (b), please identify, by wire center, the location of such facilities and whether those facilities:

- (1) Use fiber to the customer's premises;
- (2) Use coax to the customer's premises;
- (3) Use twisted copper pair to the customer's premises;
- (4) Use fixed wireless technology to the customer's premises.

Response: See Attachment 2.

All AT&T "on-net" buildings are connected using fiber facilities and/or broadband wireless facilities. Attachment 2 identifies eight (8) "off-net" buildings where broadband wireless facilities are located.

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- Interrogatory 9:
- a) For all switches or switching capacity that you have leased to provide service in the state of Florida, please identify from which switches you have self-provisioned local loops to one or more end users.
 - b) For those switches identified in response to (a), please identify the capacity of the loops self-provisioned and the number of each loop type provisioned to end users.
 - c) For those loops identified in response to (b), please state the terms, conditions, and rates under which your company is providing the loop in conjunction with the switching component.
 - d) For those switches identified in response to (a), please identify the switch name and its current software release.
 - e) For those switches identified in response to (a), are there any features being offered by the ILEC in the wire centers served by this switch that your switch is incapable of providing?
 - f) If the response to (e) is affirmative, please identify what features cannot be provided, what classes of customers use such features, and what actions would be necessary in order to provide these features.
 - g) For those switches identified in response to (a), please identify the anticipated year of retirement.
 - h) For those switches identified in response to (a), please describe any existing plans to upgrade the switch's capacity or to implement software upgrades.

Response: Not applicable

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Interrogatory 10:

- a) Are you aware of any unaffiliated CLECs that either are willing to provide or currently are providing in Florida, wholesale unbundled local switching in combination with unbundled analog loops?
- b) If the response to (a) is affirmative, please identify such companies of which you are aware, and identify in which LATAs and wire centers they offer this combination.
- c) If the response to (a) is affirmative, please explain whether or not you believe these entities qualify as wholesale providers, and the basis for your belief.

Response:

- a) No.
- b) Not applicable
- c) Not applicable

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Interrogatory 11: Please identify in which Florida wire centers you actively market your services, and what services you market in each wire center.

Response: See Attached or wire center locations. For available services, please refer to the following:
<http://ccpkms.ims.att.com/tariffs/index.html>

SUBMITTED this 29th day of December, 2003.

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A&T Local Switches in Florida											
Switch	Market	Switch CLLI	Switch Address			Switch Class	Switch Man.	Installed T1 Capacity	% Utilization	V and H Coordinates	
			Street	City	State					V	H
1	Jacksonville				FL		Lucent			07658	01262
2	Jacksonville				FL		Nortel			07613	01245
3	Miami-1				FL		Lucent			08328	00538
4	Miami-2				FL		Lucent			08283	00569
5	Miami-3				FL		Nortel			08309	00541
6	Pompano Beach				FL		Lucent			08255	00569
7	Orlando				FL		Lucent			07942	01004
8	Tampa				FL		Lucent			08171	01166

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AT&T's Local Switches

M1

Switch Name	Market	Switch CIII	Street Address	City	State	Switch Type	Manufacturer	Installed T1 Capacity	% Utilization
Jacksonville Jacksonville	Jacksonville Jacksonville			Jacksonville Jacksonville	FL FL		Lucent Northern Telecom		
Miami-1 Miami-3	Miami Miami			North Miami Ojus	FL FL		Lucent Northern Telecom		
Miami-2	Miami			Ft. Lauderdale	FL		Lucent		
Pompano Beach	Miami (Pompano Beach)			Pompano	FL		Lucent		

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Orlando	Orlando			Orlando	FL		Lucent		
Tampa	Tampa			Tampa	FL		Lucent		

AT&T's On-Net and Off-Net Collocation Cages, by Switch									
CLLI	CLLI 3	Address			V&H Coordinates			# of OC48s	DLC Capacity Installed
		Street	CO Name	State	V	H			
				FL		764800	127600	On-Net	
				FL		764800	127600	On-Net	
				FL		765200	127200	On-Net	
				FL		765200	127200	On-Net	
				FL		765800	126200	Off-net	
				FL		836200	53600	On-Net	
				FL		836200	53600	On-Net	
				FL		835100	52800	On-Net	
				FL		835100	52800	On-Net	
				FL		834300	55900	On-Net	
				FL		835200	54800	On-Net	
				FL		836100	55700	On-Net	
				FL		835400	54600	Off-net	
				FL		837400	55200	Off-net	
				FL		837200	53700	Off-net	
				FL		836400	54500	Off-net	
				FL		831300	54000	Off-net	
				FL		822500	58200	On-Net	
				FL		822500	58200	On-Net	
				FL		823400	57300	On-Net	
				FL		826700	56400	On-Net	
				FL		826700	56400	On-Net	
				FL		826700	56400	On-Net	
				FL		829600	58100	On-Net	
				FL		828100	55800	On-Net	
				FL		828100	55800	On-Net	
				FL		828000	57300	On-Net	
				FL		828800	56800	On-Net	
				FL		828800	56800	On-Net	
				FL		830100	54600	On-Net	
				FL		830100	54600	On-Net	
				FL		825400	56500	On-Net	
				FL		826400	58000	On-Net	
				FL		816200	60800	On-Net	
				FL		816200	60800	On-Net	
				FL		817100	61800	On-Net	
				FL		817100	61800	On-Net	
				FL		822500	58200	Off-Net	
				FL		823400	57300	Off-Net	
				FL		824200	57200	Off-Net	
				FL		831600	56700	Off-Net	
				FL		831000	55700	Off-Net	

				FL	792900	104300	On-Net		
				FL	795400	103200	On-Net		
				FL	795400	103200	On-Net		
				FL	796800	102200	On-Net		
				FL	796900	101800	On-Net		
				FL	794200	103400	On-Net		
				FL	794600	101600	Off-Net		
				FL	795500	104800	Off-Net		
				FL	789500	104400	Off-Net		
				FL	818000	115700	On-Net		
				FL	820200	120300	On-Net		
				FL	817400	117000	On-Net		
				FL	817200	114700	On-Net		
				FL	816000	113500	On-Net		
				FL	817200	114700	On-Net		
				FL	817500	115600	On-Net		
				FL	820600	118900	Off-Net		
				FL	822500	115900	Off-Net		
				FL	817400	117000	Off-Net		

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