

PUBLIC DISCLOSURE DOCUMENT

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 SURREBUTTAL TESTIMONY OF PAMELA A. TIPTON
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 030851-TP
5 January 28, 2003
6

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

10
11 A. My name is Pamela A. Tipton. I am employed by BellSouth
12 Telecommunications, Inc., as a Director in the Interconnection Services
13 Department. My business address is 675 West Peachtree Street, Atlanta,
14 Georgia 30375.

15
16 Q. ARE YOU THE SAME PAMELA A. TIPTON WHO FILED DIRECT
17 TESIMONY IN THIS DOCKET ON DECEMBER 4, 2003?

18
19 A. Yes, I am.

20
21 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

22
23 A. I respond to rebuttal testimony filed by AT&T witness Jay Bradbury, FCCA
24 witness Joe Gillan, Sprint witness Brian Staihr, Supra witness David Nilson, MCI
25 witness Dr. Mark Bryant, and OPC's witness Dr. Ben Johnson. All of these

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1 witnesses try to place conditions and limitations on the FCC's self-provisioning
2 trigger rule that simply do not exist.

3

4 **Section 1: Discussion of Trigger Candidate Criteria**

5

6 Q. WITNESSES GILLAN, BRADBURY, JOHNSON AND BRYANT SUGGEST THE
7 COMMISSION MUST CONSIDER A PLETHORA OF CRITERIA TO "QUALIFY"
8 CLECS AS TRIGGER CANDIDATES BEFORE THEY CAN BE COUNTED.
9 WHAT DO THE FCC RULES STATE?

10

11 A. The criteria for a CLEC to be counted with regard to the self-provisioning
12 switching trigger are clearly set forth in the FCC's Rules. 47 C.F.R. §
13 51.319(d)(2)(iii)(A)(1), Local switching self-provisioning trigger, states:

14 "To satisfy this trigger, a state commission must find that three or more
15 competing providers not affiliated with each other or the incumbent LEC,
16 including intermodal providers of service comparable in quality to that of
17 the incumbent LEC, each are serving mass market customers in the
18 particular market with the use of their own local circuit switches."

19 The other parties attempt to include as many as seven or eight unique criteria
20 that a trigger "candidate" must meet. They are simply wrong. Had the FCC
21 intended for state commissions to check off a laundry list of criteria before
22 considering a CLEC as a "trigger candidate," the rules would have said so. They
23 do not. The rule contains the only criteria that address the self-provisioning
24 trigger, it is straightforward, and it contains two, and only two, requirements.
25 Competing providers must: 1) not be affiliated with each other or the incumbent

1 LEC, and may include intermodal providers of service comparable in quality to
2 that of the incumbent LEC, and 2) be serving mass market customers in the
3 particular market with the use of their own circuit switch. Exhibit PAT-8 is a
4 decision flow chart that accurately represents the trigger analysis as reflected in
5 47 C.F.R. § 51.319(d)(2)(iii)(A)(1). This is the only decision-making analysis that
6 needs to be conducted in this proceeding, despite CLEC claims suggesting
7 otherwise.

8

9 Q. HAVE THE CLECS MISSED THE FOCUS OF THE SWITCHING TRIGGER?

10

11 A. Yes. As the FCC explained in its appellate brief (filed January 16, 2004 in the
12 appeal of the TRO currently pending in the federal courts), the switching trigger
13 has to do "with determining when market conditions are such that new entrants
14 are not *impaired* in *entering* the market." (Respondent's Brief, p. 46, n. 22). By
15 seeking to impose unnecessary criteria to the trigger analysis, the CLEC
16 witnesses are once again advocating conditions that focus more on protecting
17 their access to unbundled switching than focusing on conditions that relate to
18 market entry.

19

20 Q. MCI WITNESS MR. BRYANT ATTACHES A FLOW CHART TO HIS
21 TESTIMONY SHOWING A "TRIGGER ANALYSIS" HE HAS DEVISED.
22 SIMILARLY, MR. GILLAN HAS PROVIDED A TABLE SUMMARIZING HIS
23 IMAGINED TRIGGERS CRITERIA. IS EITHER THE FLOW CHART OR TABLE
24 SUPPORTED BY THE FCC RULE?

25

1 A. No, both analyses exceed the straightforward criteria set forth in the FCC's rule.

2

3 Q. DOES THE FCC'S RULE CONTAIN LANGUAGE THAT PRECLUDES
4 CONSIDERATION OF SO-CALLED "ENTERPRISE" SWITCHES AS SEVERAL
5 WITNESSES, INCLUDING MR. GILLAN (CRITERIA #1), SUGGEST?

6

7 A. No.

8

9 Q. IS THERE ANY REQUIREMENT IN THE APPLICABLE RULE THAT THE SELF-
10 PROVISIONING TRIGGER CANDIDATE MUST BE PROVIDING VOICE
11 SERVICE TO "RESIDENTIAL CUSTOMERS" AS MR. GILLAN (CRITERIA #2),
12 MR. BRADBURY AND OTHERS SUGGEST?

13

14 A. No.

15

16 Q. DOES THE RULE REQUIRE THAT THE SELF-PROVISIONING TRIGGER
17 COMPANY RELY ON ILEC ANALOG LOOPS TO CONNECT TO THE
18 CUSTOMER TO ITS SWITCH AS WITNESSE MR. GILLAN (CRITERIA #3), MR.
19 BRADBURY, AND OTHERS CONTEND?

20

21 A. No. The rule explicitly says that intermodal providers of service may be included
22 as trigger companies. In footnote 325 of its TRO, the FCC defined intermodal as
23 follows:

24 "By 'intermodal' we refer generally to facilities or technologies other than
25 those found in traditional telephone networks. These include, for

1 example, traditional or new cable plant, wireless technologies (satellite,
2 mobile and fixed), power line (electric grid) technologies, or other
3 technologies not rooted in traditional telephone networks. “
4

5 Q. ARE THERE SPECIFIC REQUIREMENTS THAT APPLY FOR AN
6 INTERMODAL PROVIDER OF SERVICE TO QUALIFY FOR THE SWITCHING
7 TRIGGER (MR. GILLAN, CRITERIA #4)?
8

9 A. Only one, which is that the service provided by the intermodal provider must be
10 comparable in quality to the service provided by the ILEC. The intermodal
11 provider BellSouth relies upon in its trigger analysis, meets the requirement of
12 the rule and provides service comparable in quality to BellSouth’s service.
13 Further, even if the Commission evaluated whether Comcast’s service is
14 comparable “in cost, quality and maturity” (which it is not required to do), there is
15 no question that Comcast could satisfy these criteria as well. To illustrate this I
16 have attached as Exhibit PAT-9 information that is publicly available from
17 Comcast’s website relating to its service. This information demonstrates
18 unequivocally that Comcast is an appropriate trigger candidate.
19

20 Q. DOES THE FCC’S SELF-PROVISIONING TRIGGER RULE REQUIRE THAT
21 “THE EXISTENCE OF THE CANDIDATE SHOULD BE EVIDENCE OF
22 SUSTAINABLE AND BROAD-SCALE MASS MARKET COMPETITIVE
23 ALTERNATIVES IN THE DESIGNATED MARKET” AS MR. GILLAN (CRITERIA
24 #6) AND MR. BRADBURY CLAIM?
25

1 A. No. It bears repeating that there is only one rule for implementing the self-
2 provisioning trigger and that rule contains only two criteria, neither of which is
3 that broad-scale mass market alternatives exist. Remarkably, these witnesses
4 appear to have missed that the FCC issued an errata, in which it corrected
5 paragraph 499, and removed the requirement that the self-provisioning switching
6 trigger candidates must be ready and willing to serve *all* retail customers in the
7 market. To the extent these witnesses are advocating for additional
8 requirements, this Commission should reject such arguments.

9
10 Q. MR. GILLAN AND MR. BRADBURY ASSERT THAT TRIGGER CANDIDATES
11 MUST SATISFY EVERY ONE OF GILLAN'S SIX CRITERIA BEFORE
12 QUALIFYING AS A TRIGGER CANDIDATE. PLEASE RESPOND.

13
14 A. Beyond the fact that these criteria are not contained in the rule itself, two of these
15 items -- criteria three, requiring the use of ILEC analog loops and criteria four,
16 regarding intermodal providers -- are mutually exclusive, which only highlights
17 how inappropriate and overreaching Mr. Gillan's criteria really are. An intermodal
18 carrier, by definition, does not use the traditional telephone company network.
19 Cable companies use their own facilities to reach subscribers. Satellite
20 companies use the airwaves. They do not use the incumbent company's local
21 loops, which means, under Mr. Gillan's and Mr. Bradbury's criteria, these
22 intermodal carriers can never qualify as trigger candidates. This conclusion, of
23 course, is diametrically opposed to what the FCC said, and what the CLECs
24 have acknowledged in their briefs to the appellate courts in the TRO appeals.

25

1 **Section 2: Discussion of Trigger Analysis**

2

3 Q. ON PAGES 13 AND 25, RESPECTIVELY, MR. BRADBURY AND MR. GILLAN
4 CLAIM BELLSOUTH'S TRIGGER ANALYSIS IS FLAWED BECAUSE
5 BELLSOUTH DID NOT ASK THE RIGHT DISCOVERY QUESTIONS. HOW DO
6 YOU RESPOND?

7

8 A. These claims are wrong. BellSouth asked in its First Interrogatories the
9 following: the list of (BellSouth) wire centers served by the switches owned by the
10 CLEC (Interrogatory 5); the total number of voice grade equivalent lines provided
11 to end users from the identified CLEC switches by wire center (interrogatory 6);
12 and a separation of the lines by end user and end user location by line count
13 (e.g., the number of locations with 1 line, the number of locations with 2 lines,
14 and so on). BellSouth could thus determine how many end user locations were
15 mass market, based upon BellSouth's proposed crossover point. AT&T and
16 other CLECs raised a plethora of objections to these questions, claiming that it
17 did not have the information in the format requested and thus did not initially
18 respond to BellSouth's request. AT&T later revealed that the data BellSouth
19 requested "magically became available the night before rebuttal testimony was
20 due" and that AT&T would "supplement its discovery responses." That AT&T
21 criticizes BellSouth's analysis at the same time its actions were an impediment to
22 the process is particularly galling.

23

24 Q. MR. BRADBURY CLAIMS (REBUTTAL P. 12) THAT AT&T PROVIDES
25 SERVICE TO A RELATIVELY FEW NUMBER OF VERY SMALL BUSINESS

1 CUSTOMERS THAT ARE AN ARTIFACT OF A "FAILED" BUSINESS PLAN.

2 HOW DO YOU RESPOND?

3

4 A. According to Mr. Bradbury, the "small embedded base" of very small business
5 customers totals approximately ***-----***. This hardly constitutes a
6 "small" number of customers. Further, AT&T's "failed business plan" is more
7 appropriately classified as a change in business plan upon the implementation of
8 the FCC's UNE Remand Order and the widely available UNE-platform. It is not
9 coincidence that the decline in AT&T's purchase of UNE loops began during
10 2001; UNE-P became available as a result of the FCC's UNE Remand Order
11 issued in February 2001. AT&T had only to revise its interconnection agreement
12 to avail itself of this artificial means of competition; in March 2001, AT&T adopted
13 a stand alone agreement that provided rates, terms and conditions for UNE
14 combinations, including UNE-P. It follows that despite its sunk capital investment
15 in its local switches, AT&T would be quick to implement a business strategy
16 based on UNE-P given the artificially low, practically all-inclusive cost to serve of
17 UNE-P and abandon the use stand loops served from AT&T switches.

18

19 Mr. Bradbury also claims that "active provisioning of service to very small
20 business using DS0 UNE-loops ended in late 2001." (Rebuttal, p. 9). Evidently,
21 in AT&T's view, if it is not "actively" advertising that it is providing service using its
22 own switches, or adding new customers every day, it somehow fails to qualify as
23 a trigger candidate. That is nonsensical. The FCC made it clear that the
24 purpose of the triggers is to demonstrate that CLECs are not impaired without
25 unbundled switching. Failing to advertise or failing to add new customers using

1 its own switching, particularly when UNE-P is available, proves nothing. The
2 point is, each day, every day, AT&T provides service to thousands of customers
3 in Florida, using its own switches. That is what the FCC requires of a trigger
4 candidate.

5
6 Finally, on a statewide basis, Mr. Bradbury's testimony includes a chart that
7 reflects 88% of AT&T's switches serve enterprise customers. Logic dictates that
8 the remaining 12% of customers served by AT&T's switches constitute mass
9 market customers, which means that AT&T is unquestionably a switching trigger
10 company in some markets. No other explanation, notwithstanding AT&T's
11 protests, is plausible.

12

13 Q. MR. BRADUBURY AND MS. LICHTENBERG DISPUTE THE NUMBER OF
14 SWITCHES "COUNTED" IN THE TRIGGER ANALYSIS. PLEASE COMMENT.

15

16 A. Apparently, neither Mr. Bradbury nor Ms. Lichtenberg understand that the exhibit
17 they take issue with – PAT-1 – was not intended to reflect the switches used in
18 the triggers analysis. PAT-1 demonstrates that a significant number of CLEC
19 switches are providing service in Florida and those same switches serve a
20 number of markets. PAT-1 is entirely consistent with this Commission's 2003
21 Report on Competition which states that "[a]s of June 30, 2003, 31 switch-based
22 CLECs were operating in Florida with a combined total of 126 switches."

23 Concerning the alleged "double counting," PAT-1 did in fact contain a formatting
24 error. PAT-1 did not include a column titled "Switch Node CLLI," which provides
25 the actual Point of Interconnection ("POI"), or switching presence, within a

1 particular LATA associated with a particular switch that may be physically
2 situated in a separate geographic location from the market(s) it serves. Each
3 repetition of a Switch CLLI actually represents a separate POI served from that
4 Switch CLLI, according to the CLEC-reported data contained in the LERG.
5 Although Mr. Bradbury and Ms. Lichtenberg (Supplemental Rebuttal, pp. 3-4)
6 suggest that BellSouth has not accurately portrayed the number of AT&T and
7 MCI switches in Florida, this minor formatting error has no bearing on the
8 markets in BellSouth's serving territory in Florida that satisfy the FCC's triggers
9 analysis.

10

11 Q. MR. BRADBURY CLAIMS BELLSOUTH COUNTED IN ITS TRIGGER
12 ANALYSIS ALL OF AT&T'S SWITCHES. IS THIS CORRECT?

13

14 A. No. Indeed this is yet another fundamental error on Mr. Bradbury's part.
15 BellSouth did not "count switches" as a part of its trigger analysis, because that is
16 not what the FCC requires, or even allows. BellSouth counted the number of
17 CLECs providing mass market service to customers in each geographic market.
18 What Mr. Bradbury is referring to is the list of CLEC switches derived from the
19 LERG. In no way does my testimony report or allude to Exhibit PAT-1 as a list of
20 mass market switches. Instead, my testimony explicitly describes the list as
21 "deployed in Florida." Further, BellSouth did not consider AT&T's toll switches or
22 AT&T's ADL switches, nor the services provided from these switches in its trigger
23 analysis, as Mr. Bradbury claims on pages 15-18 of his rebuttal testimony.
24 Particularly ironic is that while Mr. Bradbury takes issue with BellSouth's

1 counting, another AT&T witness, Mr. Wood, can't count at all as his testimony
2 contains the heading "CLECs are not self-providing switching."
3

4 Q. MS. LICHTENBERG SUGGESTS THAT BELLSOUTH SHOULD HAVE
5 QUANTIFIED "THE UNE-L ACTIVITY ON EACH SWITCH" USED IN THE
6 TRIGGER ANALYSIS. (SUPPLEMENTAL REBUTTAL, P. 4) IS THIS AN
7 ACCURATE INTERPRETATION OF THE RULE?
8

9 A. No. It is unclear what the purpose of doing this would have been and Ms.
10 Lichtenberg doesn't explain her position. In fact, it wouldn't make any difference
11 if MCI served every one of its mass market customers in Florida from a single
12 switch in Michigan or Maine. The point is that MCI is serving mass market
13 customers with its own switches. Ms. Lichtenberg attempts to disqualify MCI's
14 switches by seeking to impose criteria or considerations that are conspicuously
15 absent from the applicable rules and that make no sense in light of what the FCC
16 has required.
17

18 Q. SEVERAL WITNESSES, SUCH AS BRADBURY, GILLAN AND OTHERS,
19 ARGUE THAT "ENTERPRISE SWITCHES" SHOULD BE EXCLUDED FROM
20 THE SELF-PROVISIONING TRIGGER ANALYSIS. PLEASE COMMENT.
21

22 A. These witnesses are wrong. First, there is no such qualifier in the FCC's rule.
23 The rule requires no count of switches, other than presumably that each trigger
24 candidate must have its own circuit switch; the rule has no discussion regarding
25 how switches are used to provide mass market service. The only mention of this

1 issue in the TRO is in the "potential deployment" section of the TRO, and not in
2 the portion of the order addressing the triggers. If the FCC had intended this
3 requirement to be included as part of the trigger "analysis," it would have set forth
4 the requirement in its rule. It did not. The relevant inquiry is whether the
5 competing providers counted towards the trigger are providing mass market
6 service.

7

8 Q. SHOULD EVIDENCE OF SELF-DEPLOYED SWITCHES SERVING
9 ENTERPRISE CUSTOMERS BE CONSIDERED IN EVALUATING MASS
10 MARKET SWITCHING IMPAIRMENT?

11

12 A. Absolutely -- in the "potential deployment" phase of any case looking at
13 unimpairment. Both the FCC and this Commission recognize the significance of
14 such evidence. In its discussion of the "potential deployment" analysis at
15 paragraph 508 of its TRO, the FCC states:

16 "We find the existence of switching servicing customers in the *enterprise*
17 market to be a significant indicator of the possibility of serving the mass
18 market because of the demonstrated scale and scope economies of
19 serving numerous customers in a wire center using a single switch...The
20 evidence in the record shows that the cost of providing mass market
21 service is significantly reduced if the necessary facilities are already in
22 place and used to provide other higher revenue services..."

23 This Commission agrees, establishing as a separate issue in this proceeding
24 consideration for the markets in which CLECs are self-providing switching to

1 customers using DS1 or higher loops. That, however, has nothing at all to do
2 with the triggers analysis.

3

4 Q. IN HOW MANY MARKETS IN BELL SOUTH'S SERVING AREAS ARE THERE
5 THREE OR MORE SELF-PROVIDERS OF ENTERPRISE SWITCHING USING
6 DS1 LOOPS?

7

8 A. Based on the discovery responses of CLECs, there are 13 geographic markets
9 where CLECs are serving the enterprise market with their own switches using
10 DS1 loops, which are shown on the attached Exhibit PAT-10.

11

12 Q. MR. BRADBURY ALSO SUGGESTS THAT IT IS "APPROPRIATE TO DIVIDE
13 CUSTOMERS SERVED FROM CLEC SWITCHES INTO MASS MARKET OR
14 ENTERPRISE BY CLASSIFYING ALL CUSTOMERS SERVED BY ANALOG
15 DSO ONE LOOPS AS MASS MARKET CUSTOMERS AND ALL OTHERS AS
16 ENTERPRISE." (REBUTTAL, PP. 2-3). PLEASE COMMENT.

17

18 A. Although the trigger analysis set forth in the TRO does not include this criteria, if
19 BellSouth followed Mr. Bradbury's suggestion, more markets would meet the
20 triggers test. I have attached as Exhibit PAT-11 the outcome of the trigger
21 analysis using this criteria.

22

23

24

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1 **Section 3: Discussion of Trigger Candidates**

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Q. SEVERAL WITNESSES, INCLUDING MR. BRYANT, MR. STAIHR AND MR. GILLAN, ATTEMPT TO DISQUALIFY CLECS AS TRIGGER CANDIDATES ON THE BASIS THAT THEY ARE PROVIDING SERVICE TO BUSINESS CUSTOMERS ONLY. WHAT IS YOUR REACTION?

A. The FCC's rule does not require a competitive LEC to provide service to residential customers in order to qualify as a trigger candidate. The Commission must determine if three or more competing providers are serving mass market customers in a particular geographic market. The FCC defines mass market customers as consisting of "residential customers and very small business customers. Mass market customers typically purchase ordinary switched voice service and a few vertical features. Some customers also purchase additional lines and/or high speed data services." (§127, TRO) (emphasis added). Any suggestion that a particular triggers candidate must serve residential customers is incorrect. Moreover, despite Mr. Staihr's assertion that there is no residential competition in Florida, by their own admission, several CLECs are providing service to residential customers using their own switches. *** -----*** for example, is providing service to over ***-----*** residential customers.

Q. SEVERAL WITNESSES, INCLUDING BRYANT, GILLAN, STAIHR AND BRADBURY, ATTEMPT TO "DISQUALIFY" PARTICULAR (AND IN SOME CASES ALL) CLECS FROM BELL SOUTH'S TRIGGER ANALYSIS COMPLETELY. HOW DO YOU RESPOND?

1 A. I disagree with their assertions. All of the CLECs listed on the exhibit to my direct
2 testimony qualify as trigger companies based on BellSouth's analysis. Unlike
3 the claims of the witnesses, BellSouth screened out locations served by DS1
4 loops so that it did not inadvertently include an enterprise location in its mass
5 market analysis. CLECs self-reported their provision of one to three line service
6 to end users in their discovery responses. For CLECs who refused to respond to
7 discovery, or who otherwise did not provide adequate responses, BellSouth used
8 its own data. BellSouth's internal data was based on DS0 loops and residential
9 ported numbers. I will address specific assertions below.

10

11 Q. REGARDING MR. GILLAN'S TESTIMONY ON BEHALF OF FCCA, SHOULD
12 ANY WEIGHT BE GIVEN TO HIS TESTIMONY CONCERNING QUALIFYING
13 TRIGGER CANDIDATES?

14

15 A. Absolutely not. Beginning on page 26 of his rebuttal testimony, Mr. Gillan makes
16 certain assertions about specific CLEC trigger candidates and their alleged failed
17 attempts at serving the mass market segment. Remarkably, when asked about
18 the basis for his conclusions, Mr. Gillan explained in discovery that he had "not
19 conducted a survey to determine which CLECs tried to serve the mass market in
20 Florida using their own switching. The statement concerning CLEC efforts was a
21 general observation concerning the financial performance of the CLEC industry
22 nationally." (FCCA Amended and Supplemental Response to BellSouth
23 Interrogatory No. 4). This response is simply one example of how Mr. Gillan's
24 testimony has no credible foundation.

25

1 Q. AT&T WITNESS BRADBURY AND FCCA WITNESS GILLAN CLAIM COMCAST
2 SHOULD NOT BE COUNTED AS A TRIGGER CANDIDATE BECAUSE
3 COMCAST DOES NOT "SELF-PROVIDE" SWITCHING. IS THIS A VALID
4 CLAIM?

5

6 A. No. Due to the nature of AT&T's long term agreement to provide to Comcast
7 circuit switched network capability aggregated with other network services,
8 witnesses Bradbury and Gillan make a misplaced claim that such an
9 arrangement is at best large-scale enterprise arrangement, or alternatively is
10 simply not "self-provisioning" of switching.

11

12 Q. WHAT DOES THE TRIENNIAL REVIEW ORDER SAY ABOUT SUCH AN
13 ARRANGEMENT?

14

15 A. Contrary to Mr. Bradbury's and Mr. Gillan's claim, the FCC's order specifically
16 addresses such a scenario in footnote 1551, where it states:

17 "...if a carrier were to acquire the long term right to use of a non-
18 incumbent LEC switch sufficient to serve a substantial portion of the mass
19 market, that carrier should be counted as a separate, unaffiliated self-
20 provider of switching."

21 Regardless of how Comcast obtains switching from AT&T, whether as a result of
22 a merger and/or acquisition or via a lease arrangement, Comcast qualifies as a
23 self-provider.

24

1 Q. IS THERE ANY INDICATION THAT COMCAST INTENDS TO EXIT THE MASS
2 MARKET?

3

4 A. No. Comcast has a valid tariff on file with the Florida Public Service Commission
5 and its website advertises the availability of phone service, touting the superiority
6 of its service as compared to POTS.

7

8 Q. MR. GILLAN CLAIMS THAT SBC SHOULD NOT BE COUNTED BECAUSE ITS
9 PRESENCE IN FLORIDA MARKETS IS ONLY A RESULT OF BINDING TERMS
10 IN ITS MERGER WITH AMERITECH. DO THE FACTS SUPPORT HIS CLAIM?

11

12 A. No, they do not. Mr. Gillan claims SBC took the minimal steps necessary to
13 comply with the merger agreement to avoid millions in fines. Among the
14 requirements referenced by Mr. Gillan is that SBC provide service in 30 markets
15 outside SBC's 13-state region, including collocation in 10 wire centers. SBC has
16 entered 9 markets in BellSouth's Florida serving area alone and has collocated in
17 ***-----***. Furthermore, Mr. Gillan attempts to substantiate
18 his claims that SBC is not actively serving the mass market based on analyst
19 claims and statements made in the media. The facts tell a different story. In
20 response to discovery, SBC stated that it is serving mass market and enterprise
21 customers using its own switches.

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Section 4: Discussion of Market Definition

Q. BEGINNING ON PAGE 1 OF HIS TESTIMONY, SPRINT WITNESS BRIAN STAIHR DISCUSSES THE APPROPRIATENESS OF MARKET SERVING AREA ("MSA") AS A MARKET DEFINITION. WHAT IS THE OUTCOME OF BELLSOUTH'S SELF-PROVISIONING TRIGGER ANALYSIS IF MSA WERE THE MARKET DEFINITION?

A. Using this definition would result in more markets satisfying the triggers test. BellSouth's preliminary results of using MSAs as the market is attached as Exhibit PAT-11.

Q. ON PAGE 15 FCCA WITNESS JOE GILLAN RECOMMENDS USING LOCAL ACCESS TRANSPORT AREA ("LATA") AS THE APPROPRIATE MARKET DEFINITION. WHAT IS THE OUTCOME OF BELLSOUTH'S SELF-PROVISIONING TRIGGER ANALYSIS IF LATA WERE THE MARKET DEFINITION?

A. Using this definition would also result in additional markets satisfying the triggers test. BellSouth's preliminary results of using LATAs as the market is attached as Exhibit PAT-12.

1 **Section 5: Specific Response to Supplemental Rebuttal Testimony**

2

3 Q. HAVE ANY WITNESSES PROVIDED ADDITIONAL TESTIMONY
4 CONCERNING THE SWITCHING TRIGGERS ANALYSIS?

5

6 A. On January 22, 2004, both MCI witness Lichtenberg and FCCA's witness Gillan
7 filed supplemental rebuttal testimony addressing certain aspects of the triggers
8 analysis.

9

10 Q. DO YOU HAVE ANY OVERALL COMMENTS CONCERNING THIS
11 SUPPLEMENTAL REBUTTAL TESTIMONY?

12

13 A. Yes. Both witnesses attempt to complicate the FCC's straightforward triggers
14 analysis.

15

16 Q. PLEASE COMMENT ON MS. LICHTENBERG'S SUPPLEMENTAL REBUTTAL
17 TESTIMONY.

18

19 A. Ms. Lichtenberg's testimony is little more than an attempt to explain away the
20 simple reality that MCI provides service to mass market customers in Florida
21 using MCI's switches. There is no requirement that a switching triggers
22 candidate serve a certain amount of customers. There is no requirement that a
23 switching triggers company must tie its advertising to its network facilities. MCI
24 actively touts its "Neighborhood" plan to customers in Florida and elsewhere, and

1 has the means available to serve UNE-P customers using its own switches if
2 provided the proper incentive to do so.

3

4 Q: PLEASE COMMENT ON MR. GILLAN'S SUPPLEMENTAL REBUTTAL
5 TESTIMONY.

6

7 A. Unlike Mr. Gillan's rebuttal testimony, which had no factual basis (by his own
8 admissions in response to discovery), Mr. Gillan's supplemental rebuttal
9 testimony appears to be a deliberate factual misrepresentation. It is obvious that
10 Mr. Gillan's mission impossible is to attempt to "disqualify" each and every
11 switching trigger without regard to actual facts.

12

13 Q. PLEASE DESCRIBE HOW MR. GILLAN'S TESTIMONY IS INCOMPLETE.

14

15 A. Mr. Gillan is drawing conclusions based upon a subset of data that relates to a
16 CLEC's presence in the marketplace and does not relate directly to BellSouth's
17 actual trigger analysis. As I explained in my direct testimony, BellSouth's trigger
18 analysis considered CLEC provided data regarding its actual deployment, loop
19 data for business class customers from its loop inventory database, and numbers
20 ported to CLECs (which thus includes lines CLECs serve using their own
21 facilities). This contrasts with the narrow approach Mr. Gillan has apparently
22 taken, which is to disregard completely SL1 loop information, the data relating to
23 ported numbers as well as CLEC reported data.

24

25

1 Q. CAN YOU EXPLAIN WHAT DATA MR. GILLAN HAS APPARENTLY IGNORED?

2

3 A. Yes. In its response to AT&T's subpoena, BellSouth provided separate files for
4 different loop types. Mr. Gillan has apparently included only those loop types for
5 which BellSouth was able to provide information by wire center and by CLEC,
6 and has presented that data as reflective of total in-service analog loops of the
7 CLECs that meet the FCC's switch trigger. By doing so, Mr. Gillan has not
8 captured SL1 loop activity, which activity cannot be segregated by wire center
9 and by CLEC within the same report format. BellSouth provided data in
10 response to AT&T's subpoena, which included SL1 loop activity by wire center,
11 but not by wire center and by CLEC, and thus Mr. Gillan's Confidential
12 Supplemental Exhibit JPG-10 is misleading at best. Moreover, Mr. Gillan is once
13 again trying to impose requirements of his own making rather than simply
14 applying the trigger analysis contained in the FCC's rule.

15

16 Q. DO YOU HAVE ANY OTHER COMMENTS RELATING TO MR. GILLAN'S
17 SUPPLEMENTAL TESTIMONY AND EXHIBITS?

18

19 A. Yes. I do not understand why Mr. Gillan has chosen to use a selected portion of
20 data provided by BellSouth to analyze certain CLECs that are FCCA member
21 companies instead of seeking data directly from these companies. I understand
22 that AT&T, ITC^DeltaCom, Network Telephone, and MCI are all members of the
23 FCCA. It appears that Mr. Gillan has elected to obtain data from BellSouth,
24 rather than from these member companies. BellSouth has diligently attempted to
25 obtain data directly from CLECs to present this Commission with the most

1 accurate information. BellSouth has sought, as much as possible, to rely upon
2 data provided by the CLECs concerning the types of customers served and
3 where such customers are located in analyzing the switching trigger. It appears,
4 however, that Mr. Gillan has not even attempted to obtain data directly from the
5 FCCA member companies included in BellSouth's trigger analysis.

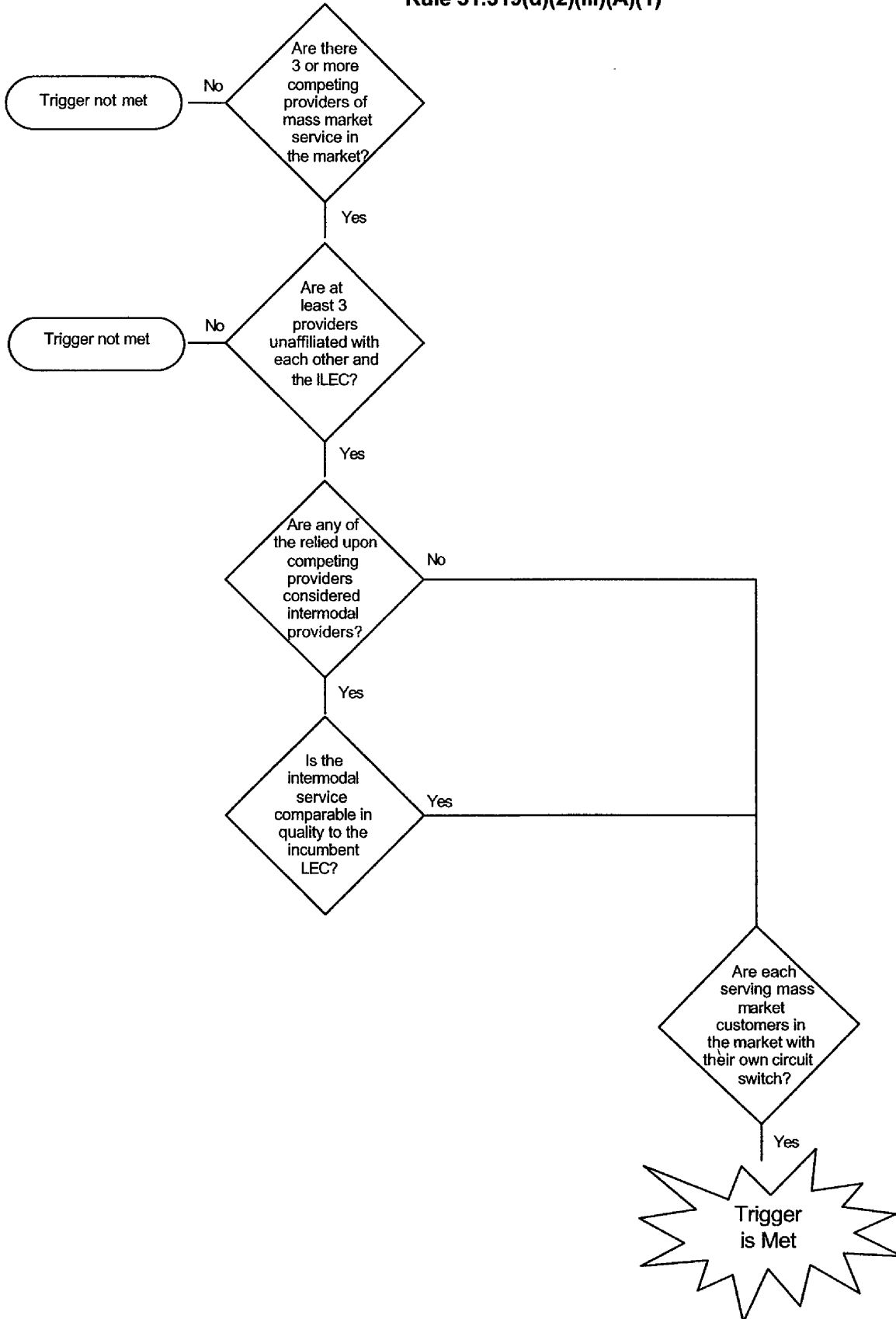
6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

8

9 A. Yes.

Decision Flow Chart to Determine if FCC Self-Provisioning Trigger is Met Rule 51.319(d)(2)(iii)(A)(1)





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With Comcast Digital Phone service you get:

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- To help you manage your time and privacy, the most popular calling features like Call Waiting and Caller ID
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What is Comcast Digital Phone?

Comcast brings you the future of local phone service with the power of broadband technology. With Comcast Digital Phone Service, you can enjoy digital quality and reliable local phone service with 15 of the most popular calling features all for one low monthly rate or a la carte. Plus, our great single-and multiple-line packages let everyone in the family communicate, all at the same time.

Did this information help to answer your question?

Yes

No

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What Are the Differences Between Digital Phone Service and Analog Service?



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What Are the Differences Between Digital Phone Service and Analog Service?

All Digital telecommunications networks work in a similar way. Analog voice signals (the old way) are converted to digital signals (the new way) at or near the originating point (your telephone), then translated back to analog at the receiving end. In this process, much of the noise and distortion can be removed.

Digital signals take your voice and translate it into an encoded series of zeros and ones. The digital signal is then translated and routed over our hybrid fiber coaxial (HFC) network (your cable) and then translated back into your voice.

The digital delivery process transmits a "cleaner" signal with less noise and distortion. Noise is screened out of the signal.

Comcast is able to deliver this new form of service using a customer's existing telephone equipment in their home. Because the signal is converted to digital over the network, customers are not required to replace their equipment.

Analog signals are continuously varying and subject to distortion and signal loss (the signal gets weaker as it gets further away from the point of origination.)

An analog signal is a continuous wave so, if there is noise or distortion, it is transmitted along with your voice.

Did this information help to answer your question?

Yes

No

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Choose a Package

Local and Long Distance Packages:

Comcast offers two levels of digital phone service to suit your needs -- Comcast Connections[™] and Comcast Complete[™] packages which can save you money and are easy to understand.

Comcast Connections[™] Packages include:

- Unlimited local calling
- Long distance options without the hassle of call minimums
- Popular features such as:
 - Caller ID[†] -- lets you know who is calling
 - Call Waiting -- never miss an important call
 - Call Waiting Caller ID[†] -- know who is calling when you're on the line
 - Long Distance Alert -- lets you know when someone is calling long distance through a unique ring tone
 - Call Return -- automatically call back your last caller

PLUS PACKAGE

Comcast Connections[™] Plus Package*

It doesn't matter what time of day you are calling -- this package provides 7 cents per minute in-state, state-to-state long distance and local toll^Δ direct dialed from home, 24 hours a day, 7 days a week.

180 PACKAGE

Comcast Connections[™] 180 Package*

Provides 180 minutes of domestic direct dialed in-state, state-to-state long distance and/or local toll^Δ from home. All calls above 180 minutes per month are 7 cents per minute.

300 PACKAGE

Comcast Connections[™] 300 Package*

Provides 300 minutes of domestic direct dialed in-state, state-to-state long distance and/or local toll^Δ from home. All calls above 300 minutes per month are 7 cents per minute.

Additional lines may be added for a monthly fee.

Included features are for first line only.

[†] Requires customer provided Caller ID equipment.

Comcast Complete[™] Packages include:

- Unlimited local calling
- Long distance options without the hassle of call minimums
- Popular features such as:
 - Caller ID[†] -- lets you know who is calling

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Digital Phone Packages

Call Waiting -- never miss an important call

Call Waiting Caller ID[†] -- know who is calling when you're on the line

Call Return -- automatically call back your last caller

Anonymous Call Rejection -- refuse unwanted calls that appear on your Caller ID display as private or anonymous

Call Screening, Distinctive Ring Service, Speed Dial 30, Three Way Calling, Repeat Dial, Selective Call Forwarding, Call Forward Variable

PLUS PACKAGE

Comcast Complete[™] Plus Package*

It doesn't matter what time of day you are calling -- this package provides 7 cents per minute in-state, state-to-state long distance and local toll^Δ direct dialed from home, 24 hours a day, 7 days a week.

180 PACKAGE

Comcast Complete[™] 180 Package*

Provides 180 minutes of domestic direct dialed in-state, state-to-state long distance and/or local toll^Δ from home. All calls above 180 minutes per month are 7 cents per minute.

300 PACKAGE

Comcast Complete[™] 300 Package*

Provides 300 minutes of domestic direct dialed in-state, state-to-state long distance and/or local toll^Δ from home. All calls above 300 minutes per month are 7 cents per minute.

Additional lines may be added for a monthly fee.
Included features are for first line only.

[†] Requires customer provided Caller ID equipment.

International Long Distance Options**

Depending on your international calling patterns, the Comcast International Savings plan can save you money. For a low monthly fee of only \$2.95, you will get great low rates for international calls to over 230 countries.

To enroll in an international plan, you must be a Comcast Digital Phone local and long distance customer.

1, 2, 3 or more lines -- Additional Lines

Today, an extra line isn't a luxury, it's a necessity. Especially if there's someone always on the computer or constantly tying up the phone. Get additional lines for all the things you want to do -- which will mean no waiting to phone, go online or send a fax.

To order now or find out more about Comcast Digital Phone, please contact us at: 1-800-288-2085.

* Not available in all areas. You must subscribe to Comcast Digital Phone local service, in-state toll and interstate toll to qualify for the package. A per line Subscriber Line Charge, a Universal Connectivity Fee and federal, state and local taxes and surcharges apply.

** Not available in all areas. You must subscribe to Comcast Digital Phone local service, in-state toll, and interstate toll services to subscribe to one of the international plans. Rates effective as of 02/14/03 and do not include a per line Subscriber Line Charge, a Universal Connectivity Charge and additional federal, state and local taxes or surcharges that may apply. Additional surcharges may apply for international calls terminating to a cellular phone.

^ΔLocal toll and in-state long distance rates are 7¢ per minute except in the following areas: California 5¢, and Massachusetts local toll 5¢.

Special Needs -- For customers with hearing/speech disabilities, please contact 1-866-803-2403.

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Calling Features to give you control of your time

Helping to protect your privacy, saving you time, and keeping connected to those you care about, Comcast Digital Phone service does it all through a broad selection of easy-to-use calling features.

Convenience Features*

Managing your calls has never been easier with features like Call Waiting, Call Return (*69) and Call Forwarding.

Privacy Features*

We help put you in control of your privacy with features such as Caller ID and Call Screening.

Answering Features

Now you have access to your messages from any phone, so you can stay in touch, even when you are away from home.

[Return to top](#)

Convenience Features

- Call Forwarding** Forwards incoming calls to a designated number. "Selective" forwards calls only from numbers you specify. "Variable" forwards all calls.
To activate press *72
- Selective Call Forwarding** This feature lets you forward incoming calls from up to 12 selected phone numbers to the location of your choice.
To activate press *63. Follow the recorded instructions.
- Call Return** Miss a call? This feature gives you the number of the last caller, plus the option to be connected automatically.
To activate press *69
- Call Waiting** Notifies you of an incoming call when you're on the phone and lets you click over to take the call if you desire.
- Custom Ring** Assigns two telephone numbers to one line, each with a unique ring type, so you know which number the call is coming in on. Great for teens!
Dial 411 for local and long distance phone numbers. Charges apply.
- Directory Assistance**
- Distinctive Ring** Let's you know instantly when a special party is calling. A distinctive ring signals calls from up to 12 numbers you've selected.
- Remote Access to Call Forwarding** Activates or deactivates your Call Forwarding even when you are away from home.
- Repeat Dialing / Continuous Dialing** Automatically calls back a busy number for up to 30 minutes, if you choose.
To activate press *66
To cancel Repeat Dial press *86
- Speed Dial 8** Speed Dial 8 lets you dial eight numbers of your choice by dialing one digital (plus # sign).
- Speed Dial 30** Speed Dial 30 lets you dial 30 numbers of your choice by dialing two



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Digital Phone Calling Features

Long Distance Blocking	digitals (plus # sign). Ensures that only local calls can be made from your phone.
Three Way Calling	Adds a third party to an existing phone call.

Features availability may vary by market. Caller ID service requires customer-provided Caller ID equipment. Number and name will appear where available. Comcast Long Distance service available only to customers who have local service with Comcast or an affiliate.

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Privacy Features

Anonymous Call Rejection	Easily rejects calls from unfamiliar numbers. The caller will receive a polite message that you are not receiving calls from numbers that have been blocked.
Call Blocking	Rejects specific types of calls: specific area codes, long distance calls or operator assisted calls.
Caller ID	Identifies incoming calls with names and phone numbers. Customer-provided Caller ID equipment required.
Caller ID with Call Waiting	Lets you know who's calling, even when you're on the phone. Requires a specially equipped Caller ID box.
Caller ID Blocking - per call	Permanently blocks the display of your name on Caller ID units.
Call Screening	Selects up to 12 numbers from which you do not want to receive calls and the caller will hear an automated message.
Call Trace	To handle threatening or harassing calls - Have a number traced and, by request, forwarded to the proper authorities. To activate press *57.
900 / 976 Blocking	Your Comcast Digital Phone account comes with 900 and 976 numbers automatically blocked.

*Feature availability may vary by market. Caller ID service requires customer-provided Caller ID equipment. Number and name will appear where available.

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Answering Features

Voice Mail	You can also add convenience with pager notification, additional mailboxes, reminder service and more.
------------	--

Voice Mail Basic

Voice Mail is a fun and exciting digital technology that allows you to create unique greetings to let callers know that you are on the phone or not answering the phone. And with your personal access code, it also enables you to easily and quickly retrieve messages from any touch tone phone. This will ensure that only authorized persons are able to listen to your important messages. Best of all, Voice Mail is digital, so you will get crisp and clear messages without the worry or hassle of tapes.

Additional Benefits of Voice Mail

- Voice Mail, unlike traditional answering machines, will answer calls even while you are on the phone
- With password protection (included), you have the peace of mind that only authorized persons can access your important messages
- Audible and visible ** message waiting indicators to alert you of new messages
- Stores up to 30 messages
- Each message may be up to 4 minutes long
- Greeting length up to 1 minute
- Message retention up to 15 days

Voice Mail Deluxe

Just like Basic Voice Mail, Voice Mail Deluxe uses digital technology to manage your important phone messages. And just like Basic Voice Mail, with your personal access code, you can retrieve messages or update your greeting from any touch tone phone. But Voice Mail Deluxe takes you a step further with more robust message storage capabilities and Pager Notification. With Pager Notification, your pager number is automatically called when a message is received in your voice mailbox. The service works with any pager service, so if you use a tone pager, you will hear its usual beep. With a digital pager, your mailbox number

Digital Phone Calling Features

will be displayed. If you use a voice pager, you will hear the first 20 seconds of the message. It's the high-tech way to ensure that you stay in touch while you're on the go.

Additional Benefits of Voice Mail Deluxe

- Provides one main mail box and up to four* sub mail boxes - each with their own personal greeting - for improved message management (great for families too!)
- Voice Mail Deluxe, unlike traditional answering machines, will answer calls even while you are on the phone.
- With password protection (Included), you have the peace of mind that only authorized persons can access your important messages
- Audible and visible** message waiting indicators to alert you of new messages
- Stores up to 45 messages
- Each message may be up to 5 minutes long
- Message greeting length up to 1.5 minutes
- Message retention up to 31 days

(* May vary by Market)

(** The visible message waiting indicator feature requires customer provided equipment)

Features availability may vary by market. Caller ID service requires customer-provided Caller ID equipment. Number and name will appear where available. Comcast Long Distance service available only to customers who have local service with Comcast or an affiliate.

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Tariffs: Florida



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- Service Guides**
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- Ohio**
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- Pennsylvania**
- Texas**
- Utah**
- Virginia - Northern**
- Virginia**
- Washington**

Exchange Price List

- Section 1 - Terms, Service Area (Index)**
- Section 2 - Regulations**
- Section 3 - Exchange Services**
- Section 4 - Message Telecommunications**
- Section 5 - Promotions**

Long Distance Tariffs

- Section 1 - Table of Contents**
- Section 2 - Rules and Regulations**
- Section 3 - Description of Services**
- Section 4 - Rates and Charges**

If my cable goes out, will my phone go out too?



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FAQ Answer

FAQ Search by Keyword:

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[FAQs](#) > [Product Information](#) > [Comcast Digital Phone](#)

If my cable goes out, will my phone go out too?

In order to maintain continuous phone service, our local telephone service will automatically reroute itself if a line in your area is damaged. Although there are extreme situations that would result in a loss of service, we are required to maintain a reliability rate of 99.9 percent for local telephone service.

Did this information help to answer your question?

- Yes
- No

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Will I still be listed in the telephone book if I switch my local service?

comcast.

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Will I still be listed in the telephone book if I switch my local service?

Yes. Switching to Comcast Digital Phone Service has no effect on your directory listing. You will continue to be listed in the telephone directory for your area.

Did this information help to answer your question?

Yes

No

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On average, how long does it take to install Comcast Digital Phone?



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On average, how long does it take to install Comcast Digital Phone?

Installation currently takes approximately three to four hours for private homes and slightly less time for apartments. Once Comcast Digital Phone Service is installed, your home will be ready for any future upgrades or additions, unless inside wiring is required.

Did this information help to answer your question?

Yes

No

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Three or More CLECs Self-Providing Switching with Any Quantity DS0 Loops

Daytona Beach FL Zone2
Fort Lauderdale FL Zone1
Fort Lauderdale FL Zone2
Fort Pierce-Port St. Lucie FL Zone2
Jacksonville FL-GA Zone1
Jacksonville FL-GA Zone2
Jacksonville FL-GA Zone3
Melbourne-Titusville-Palm Bay FL Zone2
Miami FL Zone1
Miami FL Zone2
Orlando FL Zone1
Orlando FL Zone2
Pensacola FL Zone2
West Palm Beach-Boca Raton FL Zone1
West Palm Beach-Boca Raton FL Zone2

MSAs Where Triggers are Met

Daytona Beach
Jacksonville
Melbourne
Miami-Ft Lauderdale
Orlando
Pensacola
West Palm Beach

Based on currently available data
Locations with 3 or less lines

LATAs Where the Self-Provisioning Trigger is Met

<u>LATA</u>	<u>LATA Description</u>
448	Pensacola, FL
452	Jacksonville
456	Daytona Beach
458	Orlando
460	Southeast

Based on currently available data