

ORIGINAL



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February 23, 2004

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

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COMMISSION
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Re: Docket No. 030852-TP
Implementation of requirements arising from Federal Communications
Commission's Triennial UNE Review: Location-Specific Review for DS1, DS3,
and Dark Fiber Loops, and Route-Specific Review for DS1, DS3, and Dark Fiber
Transport

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Corrected Page 3 to the Joint
Supplemental Direct Testimony of Orville D. Fulp and John White, which was filed on
January 9, 2004 on behalf of Verizon Florida Inc. Corrections were made to lines 8 and
9. Service has been made as indicated on the Certificate of Service. If there are any
questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

Richard A. Chapkis

Richard A. Chapkis

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[Signature]
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Enclosures

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Corrected Page 3 to the Joint Supplemental Direct Testimony of Orville D. Fulp and John White in Docket No. 030852-TP were sent via electronic mail and U.S. mail on February 23, 2004 to:

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1 Q. DID ALL CLECS RESPOND FULLY AND APPROPRIATELY TO THE
2 STAFF'S DISCOVERY REQUESTS CONCERNING DEDICATED
3 TRANSPORT?

4 A. No. First, not every competitive carrier identified by Verizon as having
5 operational, fiber-based collocation arrangements at a Verizon wire center has
6 responded to the Staff's transport discovery requests as of the date of this filing.
7 Those carriers include KMC, Xspedius and Progress. Of the CLECs who did
8 respond to Staff's discovery, some have failed to provide their confidential
9 responses to Verizon.¹

10

11

12 Second, Verizon has identified numerous problems and inadequacies with the
13 responses it received from many of the competitive carriers. For example, a few
14 competitive carriers claim to be unable to respond to discovery requests that are
15 essential to the application of the FCC's triggers, and still other carriers did not
16 respond fully and adequately to certain of the Staff's requests. Verizon will
17 continue its efforts to obtain complete, detailed information from all carriers in
18 Florida, including identification of additional direct routes. Verizon reserves the
19 right to combine any new data that it receives from these carriers through its efforts
20 with the information presented here and to submit further supplemental testimony
21 to the Commission.

22

23

¹ Time Warner did not provide Verizon its confidential response to Staff's TRO discovery request until the afternoon of Jan. 8, 2004, too late for inclusion in this supplemental filing.