

REDACTED



Fred Goodwin
Associate Director-Regulatory

SBC Telecom, Inc.
1010 N. St. Mary's Street
Room 13-34
San Antonio, TX 78215
Phone: 210-246-8755
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February 25, 2004

Blanco Bayó
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Request for Confidential Classification: response of SBC Telecom, Inc. to Staff's Supplemental request for information in Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed is the response of SBC Telecom, Inc. (SBCT) to the staff's supplemental request for information in the above-referenced proceeding.

Two copies of the public (redacted) version of SBCT's response are enclosed, as well as one copy of the confidential version (unredacted). Also enclosed are electronic copies of both the public and confidential versions.

Attached are two affidavits: the first attests to the accuracy of SBCT's responses to the Staff's supplemental request for information; the second attests to the confidential nature of the information provided in those responses.

Please call me if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Fred Goodwin".

Fred Goodwin
Associate Director-Regulatory

Attachments
CC: Roberta Bass

**HIGH CAPACITY LOOPS AND TRANSPORT DATA REQUEST
FOR DOCKET NO. 030852-TP**

DOCUMENT NUMBER-DATE
02827 FEB 26 03

FPSC-COMMISSION CLERK

**VERIFICATION UNDER OATH
REGARDING CONFIDENTIALITY OF RESPONSE OF SBC TELECOM, INC.
TO THE SUPPLEMENTAL DATA REQUEST OF THE FLORIDA PSC STAFF**

I, Fred Goodwin, state and attest that the attached response (Response) to the supplemental data request of the Florida Public Service Commission (PSC) Staff is filed on behalf of SBC Telecom, Inc. (SBCT) as required by Florida PSC rules.

Further, that the information asserted to be highly sensitive confidential information (customer addresses, transport provisioning, and transport capacities), is "proprietary confidential business information" within the meaning of F.S. 364.183(3)(e).

That the highly sensitive confidential information specifically comprises "information relating to competitive interests, the disclosure of which would impair the competitive business" of SBCT.

That disclosure of this highly sensitive confidential information would provide competitors valuable information about the geographic scope of SBCT's operations and service offerings that is not publicly available.

That such disclosure would allow competitors to unfairly target SBCT's customers and operations.

That the highly sensitive confidential information is intended to be, and is treated by SBCT as, private and has not been disclosed to the public.

That the highly sensitive confidential information is held as confidential within the Company, with limited access to and distribution of the information.

That the information asserted to be highly sensitive confidential information is in fact bona fide proprietary confidential business information.

And finally that highly sensitive confidential information contained in said Response has been prepared and presented in accordance with all applicable Florida Statutes, Commission Rules, and Commission Orders.

Fred Goodwin
Signature of Person Making Verification

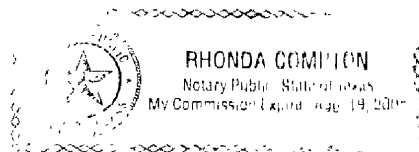
Assoc. Dir. - Regulation
Job Title

2-25-04
Date

Subscribed and sworn before me this the 25th day of February, 2004.

[Signature]
Notary Public

My Commission Expires: _____



AFFIDAVIT

By my signature below, I, Fred Goodwin, attest to the accuracy of the information contained herein and the attached documents. I have reviewed the foregoing and declare that, to the best of my knowledge and belief, the information is true and correct. I attest that I have the authority to sign on behalf of SBC Telecom, Inc. (SBCT).

Further, I am aware that, pursuant to Chapter 837.06, Florida Statutes, "Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 and s. 775.083."

Fred Goodwin
Print Name

Fred Goodwin
Signature of Person Making Verification

Title: Associate Director-Regulatory

Date: February 25, 2004

Telephone No.: 210-246-8755

Fax No.: 210-246-8759

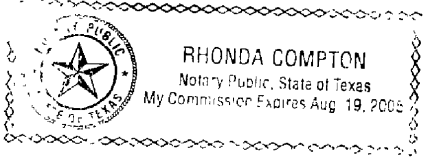
Utility: SBC Telecom, Inc.

Address: 1010 N. St. Mary's, Room 1334, San Antonio, TX 78215

STATE OF TEXAS

COUNTY OF BEXAR

Sworn (or affirmed) and subscribed before me this 25th day of February, 2004, by Rhonda Compton



(NOTARY SEAL)

Rhonda Compton
(Signature of Notary Public)

(name of Notary, Typed, Printed, or Stamped)

Personally Known _____ OR Produced Identification _____ Type of Identification Produced _____

1. Provide the following information even if you do not agree that your facilities qualify under the TRO's self-provisioning or wholesale facilities trigger. For each location and each loop in Attachment, *BellSouth Supplemental Exhibit SWP-3*, where BellSouth may have identified you as having deployed high-capacity loops, provide the following:

- (a) Whether you have deployed or are leasing high-capacity loops at that location;
- (b) whether you provide retail service at that location;
- (c) whether you provide wholesale service at that location;
- (d) if your response to (c) is affirmative, whether or not you have access to the entire customer location, including each individual unit within that location;
- (e) each capacity at which the loop has been channelized (DS 1, DS3 and OCn), and how many of each capacity are serving retail customers at that location;
- (f) each capacity at which the loop has been channelized (DS1, DS3 and OCn), and is being offered on a wholesale basis to other providers seeking to serve customers at that location;
- (g) the loops at each location that cannot be channelized at the DS 1 or DS3 level;
- (h) whether you have provisioned dark fiber (which includes dark fiber obtained under a long-term indefeasible right of use), which includes all deployed, non-lit fiber, whether it has been spliced or not;
- (i) and working dark fiber, which includes all has been spliced;

The information requested is highly confidential information, and is provided subject to a protective agreement.

- (a) [REDACTED]
- (b) [REDACTED]
- (c) [REDACTED]
- (d) [REDACTED]
- (e) [REDACTED]
- (f) [REDACTED]
- (g) [REDACTED]
- (h) [REDACTED]
- (i) [REDACTED]

2. Provide the following information even if you do not agree that your facilities qualify under the TRO's self-provisioning trigger for dedicated transport. Provide the following information for each and every route in Attachment,

BellSouth Supplemental Exhibit SWP-8, where BellSouth may have identified you as a self-provider of DS3 and/or dark fiber transport.

- (a) Identify whether or not you have either deployed your own DS3, DS1 or dark fiber facilities, or have deployed DS3 facilities by attaching your own optronics to activate dark fiber transmission facilities obtained under a long-term indefeasible right of use.
- (b) Identify each and every capacity level (DS 1, DS3 and OCn) in which you are operationally ready to provide transport along each route, and how many DS3 and OCn facilities along each route are carrying traffic.

The information requested is highly confidential information, and is provided subject to a protective agreement.

- (a) [REDACTED]
- (b) [REDACTED]

3. Provide the following information even if you do not agree that your facilities qualify under the TRO's self-provisioning trigger for dedicated transport. Provide the following information for each and every route in Attachments, *Verizon Exhibits F.1 and F.2*, in which Verizon may have identified you as a self-provider of DS3 and/or dark fiber transport.

- (a) Identify whether or not you have either deployed your own DS3, DS1 or dark fiber facilities, or have deployed DS3 facilities by attaching your own optronics to activate dark fiber transmission facilities obtained under a long-term indefeasible right of use.
- (b) Identify each and every capacity level (DS 1, DS3 and OCn) in which you are operationally ready to provide transport along each route, and how many DS3 and OCn facilities along each route are carrying traffic.

The information requested is highly confidential information, and is provided subject to a protective agreement.

- (a) [REDACTED]
- (b) [REDACTED]

4. Provide the following information even if you do not agree that your facilities qualify under the TRO's wholesale facilities trigger for dedicated transport. Provide the following information for each and every route identified in

Attachment, *BellSouth Supplemental Exhibit SWP-8*, where BellSouth may have identified you as offering wholesale DS 1, DS3 and/or dark fiber dedicated transport.

- (a) Identify each route on which you have deployed your own DS1 facilities, or are using dark fiber facilities that you have obtained on an unbundled, leased, or purchased basis if you have attached your own optronics to activate the fiber, and offer a DS1 route over these facilities on a widely available wholesale basis to other carriers desiring to serve customers on that route.**
- (b) Identify each route on which you have deployed your own DS3 facilities, or are using dark fiber facilities that you have obtained on an unbundled, leased, or purchased basis if you have attached your own optronics to activate the fiber, and offer a DS3 route over these facilities on a widely available wholesale basis to other carriers desiring to serve customers on that route.**
- (c) Identify each route on which you have deployed your own dark fiber facilities, or obtained dark fiber facilities from all entity other than the ILEC, and are operationally ready to lease or sell such facilities for the provision of fiber-based transport along the particular route.**
- (d) Provide the number of dark fiber facilities that are available along each route.**

SBCT does not offer wholesale transport; the question is not applicable.

- 5. Provide all transport routes in the BellSouth and Verizon territories in which you filed a notice to terminate service. Identify whether you channelized and offered wholesale DS 1, DS3 and dark fiber transport along each route. (Refer to *BellSouth Supplemental Exhibit SWP-8* and *Verizon Exhibits F.I-F.4*, as applicable to your company.)**

SBCT has not filed a notice to terminate service on any of its transport routes. The remainder of the question is not applicable.

Responsible person:

Fred Goodwin
Associate Director-Regulatory
SBC Telecom, Inc.

BellSouth Supplemental Exhibit SWP-3

Competitive carriers with high-capacity loop facilities to customer locations in BellSouth territory - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

	Customer location		Carrier and capacities			
Index	Address	City	Carrier	DS1	DS3	Dark Fiber
[REDACTED]						

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Route				Carrier and capacities			
Index	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber

Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Index	Route			Carrier and capacities			
	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber

Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

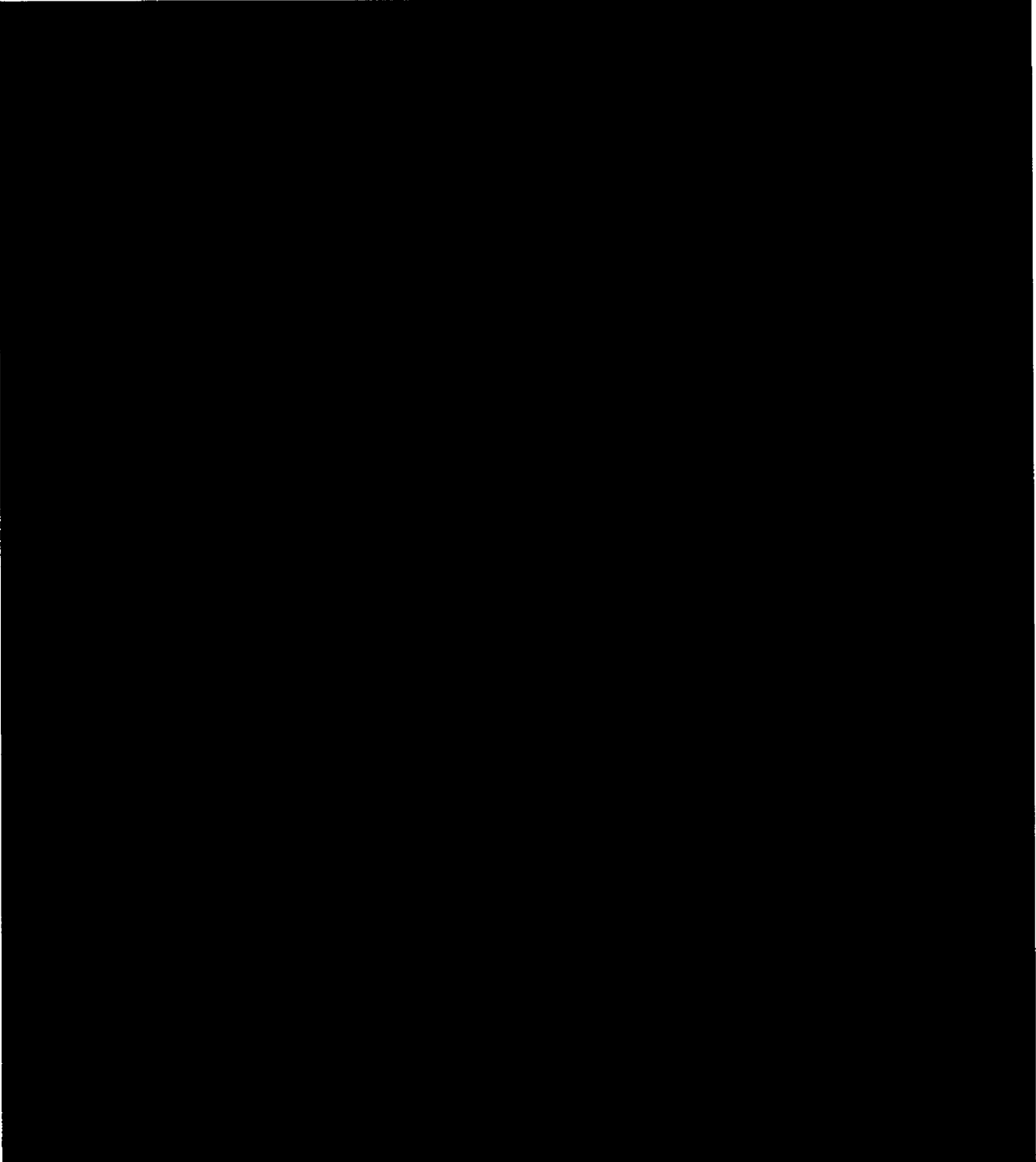
The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Index	Route			Carrier and capacities			
	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber

BellSouth Supplemental Testimony Exhibit SWP-8

Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Index	Route			Carrier and capacities			
	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber
							

BellSouth Supplemental Testimony Exhibit SWP-8

Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

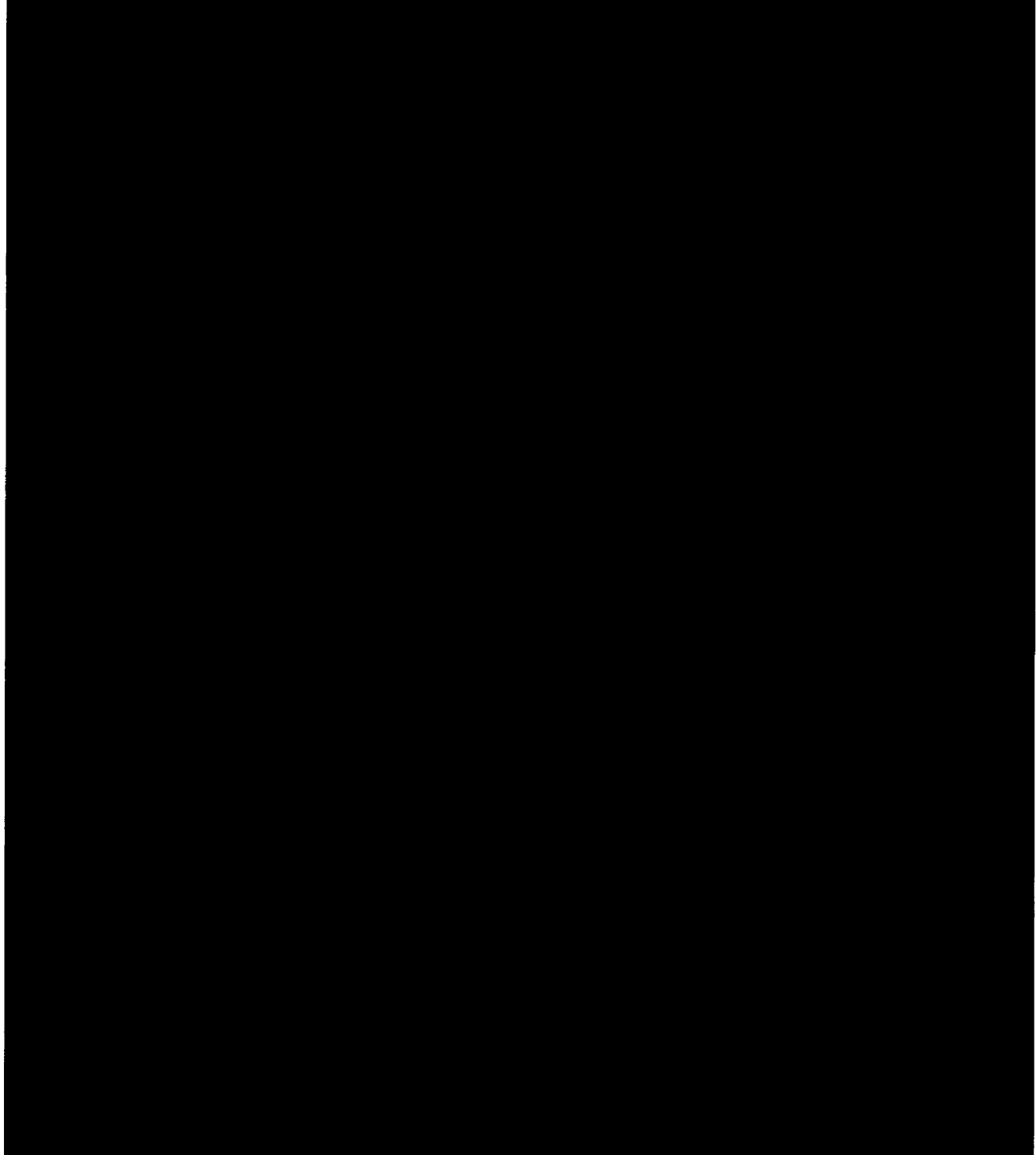
Route				Carrier and capacities			
Index	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber

BellSouth Supplemental Testimony Exhibit SWP-8

Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

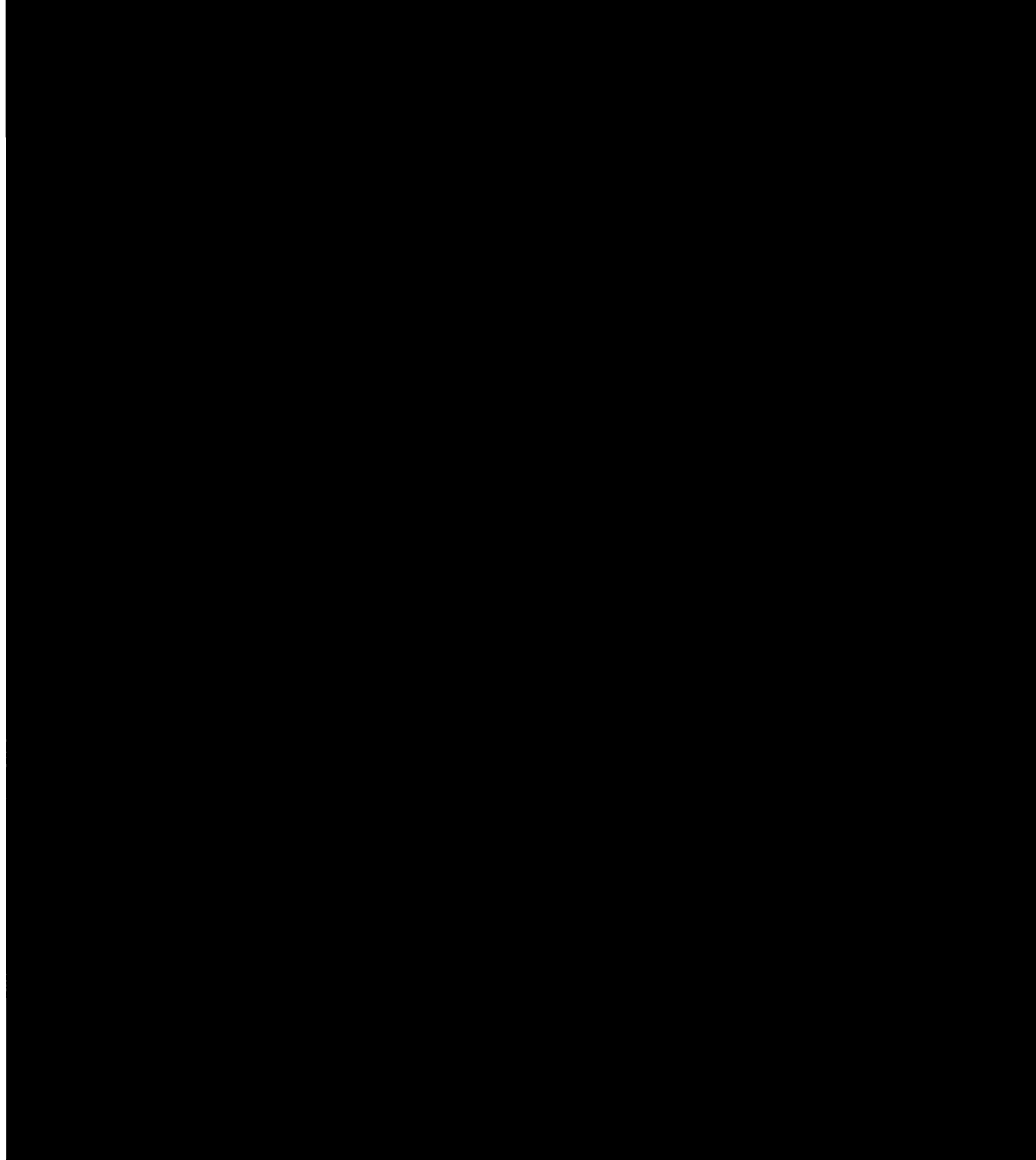
Index	Route			Carrier and capacities			
	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber



Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida


The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Index	Route			Carrier and capacities			
	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber



Competitive carriers with transport facilities on routes between BellSouth wire centers in the same LATA - State of Florida

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Route				Carrier and capacities			
Index	CLLI 1	CLLI 2	LATA	Carrier	DS1	DS3	Dark Fiber
							

The information requested is highly sensitive confidential and will be provided subject to a protective agreement

Verizon Supplemental Testimony Exhibit F.1				
LATA 952				
The information requested is highly sensitive confidential and will be provided subject to a protective agreement				
Count				CLECNm
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	SBC TELECOM
[Redacted Content]				

Verizon Supplemental Testimony Exhibit F.2				
LATA 952				
The information requested is highly sensitive confidential and will be provided subject to a protective agreement				
Count				CLECNm
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	SBC TELECOM
The information requested is highly sensitive confidential and will be provided subject to a protective agreement				