

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**ORIGINAL**

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

NEW YORK, NY  
TYSONS CORNER, VA  
CHICAGO, IL  
STAMFORD, CT  
PARSIPPANY, NJ  
BRUSSELS, BELGIUM

FACSIMILE  
(202) 955-9792  
www.kelleydrye.com

JONATHAN E. CANIS  
DIRECT LINE (202) 955-9664  
EMAIL: jcanis@kelleydrye.com

AFFILIATE OFFICES  
BANGKOK, THAILAND  
JAKARTA, INDONESIA  
MUMBAI, INDIA

February 25, 2004

**VIA FEDERAL EXPRESS OVERNIGHT DELIVERY**

Ms. Blanca Bayó  
Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

RECEIVED-130  
FEB 26 AM 10:52  
COMMISSION  
CLERK

Re: High-Capacity Loops and Transport Data Requests for Docket No. 030852-TP  
Progress Telecom, LLC's Responses to Supplemental TRO Data Request

Dear Ms. Bayó:

Attached please find the Responses of Progress Telecom, LLC ("Progress") to the Staff's Supplemental Data Request, dated February 5, 2004, submitted in the above-captioned proceeding. By this filing, Progress also submits additional data that corrects and expands the materials that Progress has filed in response to Staff's initial TRO CLEC data request. Attached please find:

- AUS \_\_\_\_\_
  - CAF \_\_\_\_\_
  - CMP \_\_\_\_\_
  - COM \_\_\_\_\_
  - CTR \_\_\_\_\_
  - ECR \_\_\_\_\_
  - GCL \_\_\_\_\_
  - OPC \_\_\_\_\_
  - MMS \_\_\_\_\_
  - SEC \_\_\_\_\_
  - OTH \_\_\_\_\_
1. Letter claiming confidential and proprietary business information status for attached materials.
  2. Progress Telecom, LLC Responses to Staff Supplemental Data Requests (Note, this single document and attachments provides responses to the two separate supplemental data requests that Staff addressed to Progress Telecom and EPIK Communications).
  3. Corrections/Revisions to Progress' first set of responses to Staff TRO CLEC Data Request.
  4. Statement of clarification re Progress Telecom, LLC network structure and configuration.
  5. Affidavit attesting to accuracy of information.

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DOCUMENT NUMBER-DATE

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FPSC-BUREAU OF RECORDS

KELLEY DRYE & WARREN LLP

February 25, 2004

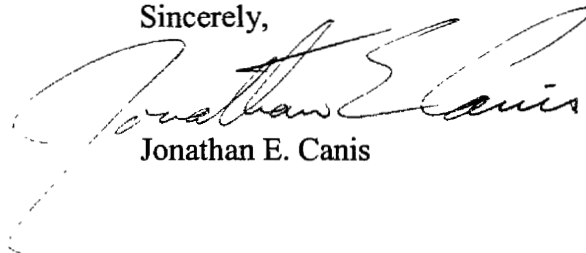
Page Two

We provide two copies of documents 2, 3 and 4 – one proprietary copy and one redacted copy for inclusion in the public record of this proceeding. Per Staff's instructions, we also provide an electronic copy of both sets of documents, with one diskette containing the public filings and a separate diskette containing the proprietary filings.

Finally, we include a stamp-return copy. We request that you date-stamp the copy when received, and return to us in the enclosed postage-prepaid envelope.

Thank you for your assistance with this filing. Please direct any questions regarding the above to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan E. Canis". The signature is fluid and cursive, with the first name "Jonathan" being larger and more prominent than the last name "Canis".

Jonathan E. Canis

cc (w/o encl:)

Kay Flynn, Chief, Bureau of Records

Roberta S. Bass, Chief, Office of Market Monitoring & Strategic Analysis

Neil Bethea, Office of Market Monitoring & Strategic Analysis

Pat Lee, Senior Analyst, Division of Competitive Markets and Enforcement

Adam Teitzman, Office of General Counsel

### AFFIDAVIT

By my signature below, I, Jonathan E. Canis, 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 Progress Telecom LLC

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."

Jonathan E. Canis  
**Print Name**  
Partner  
**Title**  
(202) 955-9664  
**Telephone No.**

*Jonathan E. Canis*  
**Signature**  
February 25, 2004  
**Date**  
(202) 955-9792  
**Fax No.**

Progress Telecom LLC  
**Utility**

**Address:** c/o Kelley Drye & Warren LLP  
1200 - 19th Street, N.W., Suite 500  
Washington, D.C. 20036

STATE OF Washington  
COUNTY OF DC

Sworn to (or affirmed) and subscribed before me this 25<sup>th</sup> day of Feb., 2004, by Jon Canis

MARY E. WITHEROW  
Notary Public District of Columbia  
My Commission Expires September 30, 2004

*Mary E. Witherow*  
(Signature of Notary Public)

(NOTARY SEAL)

(Name of Notary Typed, Printed, or Stamped)

Personally Known  OR Produced Identification \_\_\_\_\_ Type of Identification Produced \_\_\_\_\_

**RESPONSES TO STAFF SUPPLEMENTAL  
DATA REQUESTS 1-6**

**[REDACTED]**

**ATTACHMENT A**

**RESPONSE TO STAFF SUPPLEMENTAL  
QUESTIONS 1; SWP-3**

(epk\_sup) loop\_questions\_FL1.xls  
 Loop

	A	B	C	D	E	F	G
1							
2	Customer Information			Wire Center	High-Capacity Loop Type		
3	Street Address	City	Zip	CLLI	DS1	DS3	DARK FIBER
4							
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**ATTACHMENT B**

**RESPONSE TO STAFF SUPPLEMENTAL  
QUESTIONS 2, 3, 4; SWP-8**

(epk\_sup) transport\_questions\_FL2.xls  
 Transport

	A	B	C	D	E	F	G	H	I	J	K
1	FROM ILEC					TO ILEC					
2	FROM ILEC					TO ILEC					
3	Central Office Address					Central Office Address					Tr
4	CLLI	Street Address	City	State	Zip	CLLI	Street Address	City	State	Zip	DS1
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**PUBLIC INFORMATION**



(epk\_sup) transport\_questions\_FL2.xls  
Transport

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3	Transport Type	
4	DS3	DARK FIBER
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**CORRECTIONS/REVISIONS TO PROGRESS  
TELECOM LLC FIRST SET OF RESPONSES TO  
STAFF TRO CLEC DATA REQUEST**

**[REDACTED]**

	A	K	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP
1	TRANSPORT ROUTE												
2	FROM ILEC	TO ILEC	Wholesalers										
3				Transport Type			Number of transport circuits						
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Supplier?
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3			Wholesalers										
				Transport Type		Number of transport circuits							
				Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	
4	CLLI	CLLI	Carrier?										Supplier?
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transport\_questions\_FL.xls  
 Transport

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3				Transport Type			Number of transport circuits						
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Supplier?
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3				Transport Type			Number of transport circuits						
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Supplier?
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3				Transport Type			Number of transport circuits						
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1	TRANSPORT ROUTE												
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3				Transport Type			Number of transport circuits						
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	
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126	O												
127	O												
128	SI												
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134	T												
135	V												
136	Vvr												
137	W												
138	MI												
139	OC												
140	OR												
141	OR												
142	ORL												
143	S												
144	SI												
145	TA												
146	TA												
147	TA												
148	TA												



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1	TRANSPORT ROUTE												
2	FROM ILEC	TO ILEC	Wholesalers										
3				Transport Type		Number of transport circuits							
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Supplier?
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2	FROM ILEC	TO ILEC	TRANSPORT ROUTE										
3			Wholesalers										
				Transport Type		Number of transport circuits							
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Supplier?
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3				Transport Type			Number of transport circuits						
4	CLLI	CLLI	Carrier?	Dark Fiber? (X or blank)	DS1? (X or blank) *	DS3? (X or blank)	transport circuits provisioned	# DS1 level transport circuits provisioned	# DS3 level transport circuits provisioned	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Supplier?
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3				Transport Type			Number of transport circuits						
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3				Transport Type			Number of transport circuits						
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**PROGRESS TELECOM, LLC**

**Statement of Clarification  
re Network Structure and Configuration**

**This statement is made to clarify the responses that Progress Telecom, LLC (“Progress”) has made to Staff’s initial and Supplemental TRO CLEC Data Requests:**

**REDACTED**