

1 office in Orlando:

2 A No, that is not true.

3 Q Okay. Explain to me why that is not true?

4 A [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 Q All right. Now, there are four central offices in
8 South Florida, and I can give you the CLLI codes. You might
9 want to write these down. [REDACTED]

10 [REDACTED]

11 [REDACTED] Were you able to get those?

12 A Yes, I was.

13 Q Now, our records show for those four central offices
14 that FDN has requested entrance facilities. Do you agree with
15 that?

16 A I would have to go back and check my records, but I
17 believe that is correct.

18 Q Okay. Now, is FDN in the process of deploying fiber
19 at those central offices?

20 A No, we are not.

21 Q Are you aware that Geotel (phonetic) shows FDN as
22 owning fiber there?

23 A No, I am not.

24 Q Do you know what is there?

25 A I know what is not there.

1 Q Okay. I assume you are saying fiber is not there?

2 A Correct.

3 Q On Page 4 of your revised rebuttal, Lines 17 through
4 23, this is in response to a question from staff, and they were
5 asking you about how you counted the pairs of BellSouth wire
6 centers?

7 A Correct.

8 Q And you said there was one -- I thought I heard you
9 say there was one occasion where it was not counted?

10 A Correct.

11 Q And can you tell me where that is?

12 A [REDACTED]

13 [REDACTED]

14 Q And why was that not counted?

15 A Because we gave routes that went from one BellSouth
16 LSO to another BellSouth LSO.

17 Q Okay.

18 A And that is the only location where we go through
19 that LSO and continue on to an alternate LSO.

20 Q Okay. I'm sorry, what is the alternate LSO you
21 continue on to?

22 A [REDACTED]

23 Q Okay.

24 A [REDACTED]

25 Q Okay. Has FDN ever purchased transport from an

1 entity other than an FLEC?

2 A Yes.

3 Q From whom?

4 A Several carriers.

5 Q Can you list them for me?

6 MR. KASSMAN: I'm sorry, I'm going to have to object.
7 I believe we have got provisions in our agreement that prohibit
8 us disclosing confidential information such as that.

9 MS. WHITE: Even though there is a confidential
10 agreement and a protective order?

11 MR. KASSMAN: Well, I'm not sure who is on the line.
12 Do we have -- I'm not sure if FDN has a protective agreement in
13 place with all the parties on the phone. I will allow the
14 witness to answer the question if that is the case.

15 MS. WHITE: All right. Well, I know Verizon is on
16 the phone. Do you have a protective agreement with FDN?

17 MS. McCLELLAN: I'm pretty sure we do.

18 MR. KASSMAN: Yes, I'm pretty sure we do.

19 MS. WHITE: And I'm not sure, I'm sorry, I lost
20 whoever else may be on the phone. Who else is on the phone
21 besides the staff?

22 MR. KASSMAN: Anybody? Okay, that's fine. The
23 witness can answer.

24 THE WITNESS: [REDACTED]
25 [REDACTED]

[REDACTED]

BY MS: WHITE:

Q I'm sorry, what was that last one?

A [REDACTED]

Q Okay. In your revised rebuttal testimony at Page 6 -- I'm sorry, yes, at Page 6, Lines 19 through 22, you stated that you were attempting to verify wholesale availability with some of the carriers that BellSouth had identified as providing wholesale transport service?

A Correct.

Q But you have been told by a representative of one of those carriers that FDN could not purchase transport at any capacity level?

A That's correct.

Q Who was that provider?

A That was Hiperian (phonetic) in Jacksonville, or ETI (phonetic) at this point in Jacksonville.

Q What other analysis or what other investigation has FDN performed?

A We have attempted to buy UNE dark -- excuse me, not UNE, but dark fiber from FP&L. We were told it is not available to us. We have also attempted to buy DS-1s from FP&L and have been told that is not available to us.

Q Okay. And I recall that you said earlier that you did purchase transport from FP&L. What kind of transport is