

ATTACHMENT B-6

REDACTED

Allegiance Telecom of Florida, Inc.
Florida PSC Docket No. 030851-TP
Request for Confidential Classification
March 17, 2004

REDACTED COPY OF ALLEGIANCE'S
RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES
FILED FEBRUARY 24, 2004 IN FPSC DOCKET NO. 030851-TP

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**STAFF'S THIRD SET OF INTERROGATORIES TO
ALLEGIANCE TELECOM, INC. (NOS. 12 - 17)
DOCKET 030851-TP**

1
2 **Question 12**
3

4 For the purpose of the following questions, please refer to the direct testimony of
5 BellSouth witness Tipton, Exhibit PAT-4.

6 (a) Considering only UNE Zones 1 and 2, please identify in which of the following
7 markets Allegiance has entered: Jacksonville, Orlando, Miami, Fort Lauderdale,
8 West Palm Beach- Boca Raton, Pensacola, or Daytona Beach.

9 (b) Of those markets Allegiance has identified in (a) as having entered, please
10 identify those markets where Allegiance provides service using UNE-L.

11 (c) For those markets identified in (b), please identify the CLLI of each switch that
12 serves these markets.

13 (d) For each switch identified in (c), please identify the number of DS0 lines served
14 in each market.

15 (e) For those DS0 lines served in each market identified in (d), please indicate the
16 number of customer locations served by those DS0 lines.

17 (f) Of those customer locations identified in (e), please indicate the number of
18 customer locations with 3 or fewer DS0 lines.

19 (g) For each switch identified in (c) that provides DS0 service, please state the
20 percent of total capacity used to provide DS0 service.

21 (h) For each switch identified in (c) that provides DS0 service, please state the
22 percent of spare capacity.

23 (i) For each switch identified in (c), please identify the ILEC wire centers served.

24 (j) Of those markets Allegiance has indicated in (a) as having entered, please state
25 in which wire centers Allegiance has collocation arrangements.

26 (k) Of those markets Allegiance has indicated in (a) as having entered, please state
27 in which markets Allegiance does not have a collocation arrangement in any
28 wire center within that market.

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1 **Question 12 (cont.)**

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3
4 **Answer**

5
6 (a) Allegiance Telecom has entered the following markets:

7 Miami

8 Fort Lauderdale

9 West Palm Beach- Boca Raton

10 Jacksonville

11 Orlando

12 Pensacola

13 Daytona Beach

14 (b) Allegiance Telecom provides service in the following markets using UNE-L.

15 Miami

16 Fort Lauderdale

17 West Palm Beach- Boca Raton

18 (c) The Miami Switch serves the markets identified in 12 (b) and the CLLI is
19 MIASFL68

20 (d) Miami DS0 Lines Served

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22 Fort Lauderdale DS0 Lines Served

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24 West Palm Beach- Boca Raton DS0 Lines Served

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1 **Question 12 (cont)**

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3 (e) Miami Customer Locations

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5 Fort Lauderdale Customer Locations

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7 West Palm Beach- Boca Raton Customer Locations

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9 (f) Miami 3 or fewer DSO Lines


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11 Fort Lauderdale 3 or fewer DSO Lines

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13 West Palm Beach- Boca Raton 3 or fewer DSO Lines

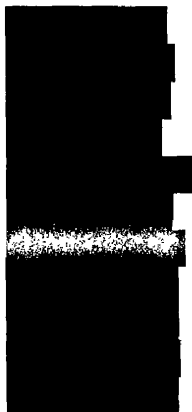
14 

15 (g) The current utilization for all services is % in the Miami switch.

16 (h) There is % available switch capacity on the Miami switch.

17 (i) ILEC Wire centers served by the Allegiance Miami switch:

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Question 12 (cont)

[REDACTED]

24 (j) See response to Question 12 (i).

25 (k) Allegiance Telecom does not have collocation arrangements in the following

26 markets:

27 [REDACTED]

28 [REDACTED]

29 [REDACTED]

30 [REDACTED]

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1 **Question 14**
2






3 For the purpose of the following questions, please refer to the direct testimony of
4 Verizon's witness Fulp , Exhibit ODF-3.

- 5 (a) Considering only UNE Zones 1 and 2, please state whether Allegiance has
6 entered the Tampa- St. Petersburg- Clearwater market.
- 7 (b) If the response to (a) is affirmative, please state whether Allegiance provides
8 service using UNE-L.
- 9 (c) If the response to (b) is affirmative, please identify the CLLI of each switch
10 which serves this market.
- 11 (d) For each switch identified in (c), please indicate the number of DS0 lines served
12 in this market.
- 13 (e) For those DS0 lines served in this market identified in (d), please indicate the
14 number of customer locations being served by those DS0 lines.
- 15 (f) Of those customer locations identified in (e), please indicate the number of
16 customer locations with 3 or fewer DS0 lines.
- 17 (g) For each switch identified in (c) that provides DS0 service, please state the
18 percent of total capacity used to provide DS0 service. For each switch identified
19 in (c) that provides DS0 service, please state the percent of spare capacity.
- 20 (h) For each switch identified in (c), please identify the ILEC wire centers served.
- 21 (i) If the response to (a) is affirmative, please state the ILEC wire centers within
22 this market in which Allegiance has collocation arrangements.
- 23 (j) If the response to (a) is affirmative, please state whether Allegiance does not
24 have a collocation arrangement in any wire center within this market.

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1 Question 14 (cont.)

2
3 Answer

- 4
- 5 (a) Allegiance Telecom has entered the Tampa-St. Petersburg-Clearwater market.
- 6 (b) Allegiance Telecom provides UNE-L service in the market identified in 14(a).
- 7 (c) The Tampa Switch serves the markets identified in 14(a) and the CLLI is TAMSFLZK
- 8 (d) Tampa-St. Petersburg-Clearwater DS0 Lines Served:
- 9 
- 10 (e) Tampa-St. Petersburg-Clearwater Customer Locations Served:
- 11 
- 12 (f) Tampa-St. Petersburg-Clearwater Customer Locations with 3 or fewer DS0 lines
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- 14 (g) The current utilization for all services is % in the Tampa switch.
- 15 (h) There is % available switch capacity on the Tampa switch.
- 16 (i) ILEC Wire Centers Served:

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1 **Question 14 (cont)**

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4 (j) See response to Question 14 (i)

5 (k) See response to Question 14 (i)

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1

2 **Question 16**

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4 For the purpose of the following questions, please refer to your response to
5 Interrogatory 15.

6 (a) Of those markets Allegiance has identified as having entered, please identify
7 those markets where Allegiance provides service using UNE-L.

8 (b) For those markets identified in (a) please identify the CLLI of the switch that
9 serves these markets.

10 (c) For each switch identified in (b), please indicate the number of DS0 lines served
11 in each market.

12 (d) For those DS0 lines served in each market identified in (c), please indicate the
13 number of customer locations being served by those DS0 lines.

14 (e) Of those customer locations identified in (d), please indicate the number of
15 customer locations with 3 or fewer DS0 lines.

16 (f) For each switch identified in (b) that provides DS0 service, please state the
17 percent of total capacity used to identify DS0 service.

18 (g) For each switch identified in (b) that provides DS0 service, please state the
19 percent of spare capacity.

20 (h) For each switch identified in (b), please identify the ILEC wire centers served.

21 (i) Of those markets Allegiance has identified as having entered, please state in
22 which wire centers Allegiance has collocation arrangements.

23 (j) Of those markets Allegiance has identified as having entered, please state in
24 which markets Allegiance does not have a collocation arrangement in any wire
25 center within that market.

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1 **Question 16 (cont)**

2
3 **Answer**

4
5 (a) Allegiance Telecom has entered the following markets:

6 Tarpon Springs

7 Newport Richey

8 (b) The Tampa Switch serves the markets identified in 16(a) and the CLLI is

9 TAMSFLZK

10 (c) Tarpon Springs [REDACTED] DS0 lines served

11 Newport Richey [REDACTED] DS0 lines served

12 (d) Tarpon Springs [REDACTED] customer locations

13 Newport Richey [REDACTED] customer locations

14 (e) Tarpon Springs [REDACTED] customer locations with 3 or fewer DS0 lines

15 Newport Richey [REDACTED] customer locations with 3 or fewer DS0 lines

16 (f) See response to Question 12 (g)

17 (g) See response to Question 12(h).

18 (h) The following wire centers are served by the switch identified in 16(b):

19 [REDACTED]

20 [REDACTED]

21 (i) See response to Question 16 (h)

22 (j) See response to Question 16 (h)