

REDACTED

ORIGINAL
Comcast Phone - Public Version

2004 Competitive Local Exchange Carrier (CLEC) Data Request
(Due by July 15, 2004)

040000-70

Legal Company Name: Comcast Phone of Florida, LLC ("Comcast Phone" or the "Company")

D/B/A: Comcast Digital Phone

FPSC Company Code (e.g., TX000): TX576

Contact Name & Title: David J. Sered, Director of Government and Regulatory Affairs, Southern Division

Telephone Number: 678-460-1610

E-mail Address: david_sered@cable.comcast.com

Stock Symbol (if company is publicly traded): Not Applicable

1. If you are providing local service in Florida please complete the attached Tables 1-3. Please see attached tables.

2. Please indicate which of the following services your company provides. Select all that apply.

- | | | | |
|-------------------------------------|-----------------------------|--------------------------|---------------------------|
| <input checked="" type="checkbox"/> | Local telephone service | <input type="checkbox"/> | Paging service |
| <input type="checkbox"/> | Private line/special access | <input type="checkbox"/> | Prepaid service |
| <input type="checkbox"/> | Wholesale loops | <input type="checkbox"/> | VoIP |
| <input type="checkbox"/> | Wholesale transport | <input type="checkbox"/> | Cable television |
| <input checked="" type="checkbox"/> | Interexchange service | <input type="checkbox"/> | Satellite Television |
| <input type="checkbox"/> | Cellular service | <input type="checkbox"/> | Broadband Internet Access |

3. If your company provides pre-paid local telephone service, is this is the only service you currently provide in Florida? **Not Applicable. Comcast Phone does not provide pre-paid local telephone service in Florida.**

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC _____
- OTH _____

4. Please complete the table on the following page showing the different bundles that you offer by marking the services you offer along with the price and take rate (the percentage of customers that subscribe to the corresponding package) for residential and business customers.

| | | Local | Long Distance | Broadband | Wireless | Video Service | Price | Take Rate |
|-----------------------------|--------------------------|-------|---------------|-----------|----------|---------------|---------|-----------|
| Residential Packages | Connections Plus | X | X | | | | 29.95 | |
| | Connections 180 | X | X | | | | 28.95 | |
| | Connections 300 | X | X | | | | 43.95 | |
| | Complete Plus | X | X | | | | 31.95 | |
| | Complete 180 | X | X | | | | 40.95 | |
| | Complete 300 | X | X | | | | 45.95 | |
| | Connections Any Distance | X | X | | | | 48.95 | |
| | Package 7 | | | | | | | |
| | Package 8 | | | | | | | |
| | Package 9 | | | | | | | |
| | Package 10 | | | | | | | |
| | Package 11 | | | | | | | |
| | Package 12 | | | | | | | |
| | Package 13 | | | | | | | |
| | Package 14 | | | | | | | |
| Package 15 | | | | | | | | |
| Business Packages | Example | X | X | X | | | \$89.99 | |
| | Package 1 | | | | | | | |
| | Package 2 | | | | | | | |
| | Package 3 | | | | | | | |
| | Package 4 | | | | | | | |
| | Package 5 | | | | | | | |
| | Package 6 | | | | | | | |
| | Package 7 | | | | | | | |
| | Package 8 | | | | | | | |
| | Package 9 | | | | | | | |
| | Package 10 | | | | | | | |
| | Package 11 | | | | | | | |
| | Package 12 | | | | | | | |
| | Package 13 | | | | | | | |
| | Package 14 | | | | | | | |
| Package 15 | | | | | | | | |

- (a.) Please indicate below what vertical services are available in the bundles you offer.

| | |
|---------------------------|-------------------|
| 3-way calling | <u> x </u> |
| Caller ID w/ name | <u> x </u> |
| Call Hunt | <u> </u> |
| Call Waiting | <u> x </u> |
| Voice Mail | <u> </u> |
| Call Transfer | <u> x </u> |
| Caller ID Block | <u> x </u> |
| Repeat Dialing | <u> x </u> |
| Call Return | <u> x </u> |
| Call Waiting w/ Caller ID | <u> x </u> |
| Line Guard | <u> x </u> |

Other (Specify) For residential customers, the Company offers four bundles of vertical services. The Two Feature Pack and Multi Feature Pack are described in paragraphs 3.3.3.G.1 and G.2 of the Company's Florida Price List No. 2. The Value Pack and Premium Pack are described in paragraphs 3.3.4.F.1 and F.2 of the Company's Florida Price List No. 2. For business customers, the Company offers 21 vertical features with discounts based upon subscription to two or more features as described in Section 3.3.5.F of the Company's Florida Price List No. 2. (See especially footnote 5 on Sheet No. 63.5.)

- (b.) How many of the above services are included in a bundle? For residential customers, the "bundles" or "packs" include from 2 to 12 features as set forth in their descriptions referenced in response 4(a.) preceding. For business customers, the discounts apply to all 21 features.
- (c.) Are these bundles offered in all areas where you provide service? If not, why not and do you intend to offer them in the future? The Two Feature Pack and Multi Feature Pack offerings were grandfathered on October 15, 2003. The Value and Premium Packs are offered wherever the Company provides residential service. All business services were grandfathered in March 2003.
5. Indicate below whether you are offering or providing VoIP service to end-user customers in Florida? For purposes of this question, VoIP service is defined as IP-based voice service provided over a digital connection. VoIP calls under this definition may or may not terminate on the PSTN.
- x Not offering VoIP service in Florida.
 Offering business VoIP services.
 Offering residential VoIP services.

If you are offering or providing residential or business VoIP service in Florida:

- (a.) List the locations in Florida where you are offering VoIP service. If you roll out service by MSA, list the MSAs; if rolled out by exchange, list the exchanges, etc. **Not Applicable. See response above.**
- (b.) Provide residential price(s) for VoIP service. **Not Applicable. See response above.**
- (c.) ⁴ Provide small business price(s) for VoIP service. **Not Applicable. See response above.**
- (d.) List all call features included with the service, e.g., call forwarding, caller ID, voice mail, etc. **Not Applicable. See response above.**
- (e.) Check all that apply to your VoIP service: **Not Applicable. See response above.**
- Offer wireless VoIP service.
 - Offer wireline VoIP service.
 - 911 (Location information not provided automatically to PSAP).
 - E911 (Location information provided automatically to PSAP).
 - CALEA (Communications Assistance for Law Enforcement Act).
 - Telephone Relay Service.
 - Power Backup (If so, identify time duration below, e.g., 4 hours, 8 hours).
 - Time duration of power backup (in hours).**
 - Directory Assistance.
 - Operator Services.
 - Equal Access to long distance providers.
 - Local Number Portability.
 - Local Calling.
 - Long Distance Calling.
 - International Calling.
 - Contribute to Universal Service Fund.
 - Require VoIP subscriber to also purchase Broadband service.
 - Offered as primary line service.
 - Offered as secondary line service only.
 - Interconnected with PSTN.
 - Peer-to-Peer only (no interconnection with PSTN).
 - Use of public Internet.
 - Use of private IP network.
 - Call uptime 99.999%.
 - Use of numbers from the North American Numbering Plan Administrator.
6. If you are not offering or providing VoIP service to end-user customers in Florida, do you anticipate doing so? If yes, identify rollout month/year. **Comcast Phone, the jurisdictional utility completing this report, does not have plans to offer VoIP services to end-user customers in Florida.**

7. **Broadband Internet Access. Not Applicable. Comcast Phone, the jurisdictional utility completing this report, does not offer Broadband Internet Access service in Florida.**

(a.) With this data, we are interested in reporting on an aggregate statewide rather than a per company basis.

- Provide the total number of **residential** lines and wireless channels over which you or an affiliate are providing broadband service in Florida.

- Provide the total number of **small business** lines and wireless channels over which you or an affiliate are providing broadband service in Florida. _____

- Provide the total number of **residential and small business** lines and wireless channels over which you or an affiliate are providing broadband service in Florida.

Not applicable to Comcast Phone. See response to Question 7(a).

With respect to affiliates of Comcast Phone which are not jurisdictional utilities in the State of Florida (if any), those affiliates make subscribership information available to the FCC as part of their regular Form 477.

(b.) What types of broadband connection(s) do you provide?

- xDSL
- cable modem
- satellite
- fixed wireless
- mobile wireless
- Wi-Fi
- Broadband over power line
- Other (Specify)

Not applicable. See response to Question 7(a).

(c.) How do you provision broadband services? Check all that apply.

- Over own facilities
- Over UNE loops
- Over resold facilities (ILEC)
- Over resold facilities (non-ILEC)
- Over loops or channels obtained from unaffiliated entities (non- ILEC)
- Through line splitting agreements

Not applicable. See response to Question 7(a).

(d.) Please fill out the following table providing the downstream and upstream data transfer rates and the monthly price for each tier of broadband service you offer.

| Broadband Service | Data Transfer Rate | | \$ Price/month |
|-------------------|--------------------|----------|----------------|
| | Downstream | Upstream | |
| Residential | | | |
| | | | |
| Business | | | |
| | | | |

Not applicable. See response to Question 7(a).

8. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any major obstacles or barriers encountered that you believe maybe impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles.

Yes. Comcast Phone has experienced operational barriers to entry in the Florida local exchange market. As the Commission is aware, Comcast Phone intervened in the *Petition of Mpower Communications, Corp. and Florida, Digital Network, Inc. for Expedited Temporary and Permanent Relief against BellSouth Telecommunications, Inc. for Alleged Anticompetitive Conduct Regarding Florida Digital Network, Inc.'s Proposed Acquisition of Assets and Customer Base of Mpower Communications, Corp.*, Docket No. 030301-TP. During 2003, Comcast Phone attempted to work with BellSouth over a period of three to four months to develop a plan to transition Comcast customer records (which reside in BellSouth directory listing databases) from AT&T Broadband industry codes to a new set of Comcast-specific industry codes (this need resulted out of Comcast Phone's earlier acquisition of AT&T Broadband). BellSouth refused to provide a project-based estimate for completing this work. Instead, they insisted that they would only complete the work under tariffed or interconnection agreement rates. Such rates generally apply when CLECs make "one-off" modifications to customer records in the ILEC's directory listing database (e.g., changing a listing from published to non-published). Such rates were not contemplated to apply to mass record migrations such as the one Comcast Phone needed to effectuate. Comcast Phone has approximately 90,000 customers' records it needs to modify in Florida. Under its tariffed rates, BellSouth proposed to charge Comcast Phone, under a range of migration options, as much as \$9,100,000 for the project. As a comparison, other ILECs in Comcast Phone's other operating regions agreed to migrate Comcast Phone directory listing records from AT&T Broadband codes to Comcast Phone codes at either reasonable project-based rates or at no cost whatsoever. In one case, an ILEC performed the migration of

40,000 records for a cost of \$295,000. Another ILEC agreed not to charge Comcast Phone for the migration of its records in their region.

Comcast Phone also experiences a barrier to entry related to BellSouth's practice of not permitting local service customers to port telephone numbers to Comcast Phone when the customer also subscribes to BellSouth's DSL service. In any given month, numerous Comcast Phone orders in BellSouth territory that fail due to BellSouth's refusal to port out customers to Comcast Phone's voice service. Comcast Phone's parent company has submitted comments to the FCC on this matter in *In the matter of BellSouth Telecommunications, Inc. Request for Declaratory Ruling That State Commissions May Not Regulate Broadband Internet Access Services by Requiring BellSouth to Provide Wholesale or Retail Broadband Services to CLEC UNE Voice Customers*, WC Docket No. 03-251.

9. Please provide any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. **Comcast Phone believes that the Florida PSC and the Florida Legislature, as appropriate, should continue to devote particular attention to the implementation and monitoring of performance measurements, performance standards and performance penalties for ILEC provisioning of network elements and of other incumbent services.**
10. As of December 31, 2003, how much money (in thousands of dollars) have you invested in your network serving Florida customers? **Comcast Phone, the jurisdictional utility completing this report, does not own its own network facilities in the state of Florida.**
11. Are you currently operating under Chapter 7 or Chapter 11 protection? **No.**
12. If your company filed a Form 477 with the Federal Communications Commission in March 2004, please enclose a copy of the completed form with your response to this data request. (NOTE: This form only applies to CLECs with a minimum of 10,000 access lines.) **Comcast Corporation's FCC Form 477 contains significant information about operating entities not subject to the jurisdiction of the Florida PSC. In lieu of providing the Commission with a copy of the FCC Form 477, Comcast Phone, which is subject to the Florida PSC's jurisdiction, attaches hereto information responsive to the Commission's data table request. Please note that the data table information represents the confidential and proprietary information of Comcast Phone.**
13. Following the D.C. Circuit's decision, the FCC called for ILECs and CLECs to negotiate.
 - (a.) Are you currently in negotiations with any ILECs? **As of the date of this filing, Comcast Phone was conducting negotiations for a TRO amendment with an ILEC. The ILEC has requested temporary suspension of those negotiations.**

- (b) If so, with which carriers? **Comcast Phone was negotiating a TRO amendment with BellSouth.**
 - (c) **Are the negotiations national or Florida-only? Comcast Phone is negotiating an amendment to its BellSouth interconnection agreements in several states including Florida.**
 - (d) **Have you reached agreement with one or more carriers? No. Please see response to Question 13(a).**
14. If so, please provide the name(s) of the carrier(s) and when you expect to file your agreement(s) with the Florida Commission. If you do not intend to file your agreement(s), explain why. Not applicable. **Please see the response to Question 13(d).**

Attachments: Confidential & Proprietary Data Table Responses

FLORIDA PUBLIC SERVICE COMMISSION

2004 CLEC Data Request TABLE-1

(Data as of May 31, 2004)

Company Name: Comcast Phone of Florida, LLC (aka Comcast Digital Phone)

Company Code: TX978

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

NOT INCLUDE UNE-P, ACCESS LINES (VGE Basis),
 NOT INCLUDE UNE-P, RESOLD LINES, OR PRIVATE LINES IN THIS TABLE

| 1 | 2 | 3 | 4 | 5 |
|----------------|-----------|---------|-----------------------------------|--------------------------------|
| Exchange | Line Type | Service | Type of Service (UNE-P, DS1, DS3) | Access Line Label (e.g., Loop) |
| FERNADEZ | Res | SP | Digital | Loop |
| GLADSTONE | Res | SP | Digital | Loop |
| JACKSON | Res | SP | Digital | Loop |
| JACKSONVILLE | Res | SP | Digital | Loop |
| JELFERTON | Res | SP | Digital | Loop |
| MIDDLEBURGH | Res | SP | Digital | Loop |
| ORANGE PARK | Res | SP | Digital | Loop |
| PITTSBURGH | Res | SP | Digital | Loop |
| STAGGVIEW | Res | SP | Digital | Loop |
| TREASURE COAST | Res | SP | Digital | Loop |
| WILLADEWELL | Res | SP | Digital | Loop |
| WILLYWOOD | Res | SP | Digital | Loop |
| WINDY | Res | SP | Digital | Loop |
| NORTH LAKE | Res | SP | Digital | Loop |
| POKESVILLE | Res | SP | Digital | Loop |
| FLAUBERT | Res | SP | Digital | Loop |
| JACKSONVILLE | Res | SP | Digital | Loop |
| JACKSONVILLE | Res | SP | Digital | Loop |
| BONNAPART | Res | SP | Digital | Loop |

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-1:

- A. The purpose of this table is to obtain your end-user VGE access lines (other than UNE-P and resale) and to whose switches they are connected.
- B. Do NOT include UNE-P or Resold access lines or services you resold/retailed UNE-L and EELs obtained from ELEC. Also do not include line or channels, such as private lines, that are not connected to a switch. - The access line counts in Table-1 above must be based on all of your different types of access lines such as copper, fiber, hybrid fiber/copper, coaxial cable, hybrid fiber/optical cable, feed-wireless (two-space optics, microwave or satellite, etc.).
- C. Each field must be populated. Do not use condition marks.
- D. Report VGE Access Lines based on how you bill the customer. If you bill a customer for 1 DS1, the access line count would be 24 even if the customer isn't utilizing all 24 channels. If you bill a customer for 10 channels in a DS1, then the line count would be 10.
- E. Residential and business VGE access line counts may be obtained by querying your billing database, provisioning database, etc. Exchange information is available at NANPA's website at <http://nnpa.npa.com>. Click on "Reports", "Central Office Codes Reports", "Central Office Code Assignment Records", scroll down to "CO Code (Prefix) Status-Excel Spreadsheet Files", click on the file for the Eastern region and open file "EIS-COCostcuty", click on "TL" tab, then save it to a table in a database and run a query to capture all of your residential and business access line NPAs/NOAs to identify their respective exchanges (shown in the "Area Group" column of the NANPA's website).

TABLE COLUMN INSTRUCTIONS:

- Column 1. List exchanges in alphabetical order.
- Column 2. Enter the abbreviation for Residential Lines or Bus for Business lines. Each service type must be entered in separate rows.
- Column 3. Enter Method of Service as either SP (Self-Provisioned Lines), NE (Lines obtained from non-ELECs), UNE-L, EEL (includes only Loop and not transport pieces), or Other. Each method must be entered in separate rows.
- Column 4. Enter Type of Service as either Analog or Digital. Each type must be entered in separate rows.
- Column 5. For Analog lines, enter count as an analog loop for each method of service and service type (yes or no). Each count must be entered in separate rows. For digital services, enter line count as voice-grade equivalent (VGEs). Count lines based on how they are charged to the customer rather than how they are physically provisioned. EXAMPLE: Report 0 voice-grade equivalent lines if a customer buys 8 channels that happens to be provisioned on a DS1 circuit if a customer buys a DS1 circuit that is provisioned as a channelized service. Report 24 voice-grade equivalent lines, even if there is some indication that the customer is only using 8 of the derived lines. Report 2 VGEs for each ISDN-BRI and 23 VGEs for each ISDN-PRI. Lines must be entered without duplication, e.g., Enhanced Extended Line (EEL) lines must not be included in UNE-L counts and vice versa. Each line count must be entered in separate rows. The Grand Total must be equal to the total number of residential and business VGE access lines connected to the switching switches used by the CLEC.
- Column 6. Enter either Owned, if access lines are connected to your own switch, or Leased, if you are purchasing switching service from another company.
- Column 7. If you are purchasing switching service from another company, provide name of company.

FLORIDA PUBLIC SERVICE COMMISSION

2004 CLEC Data Request TABLE-2

(Data as of May 31, 2004)

Company Name: Comcast Phone of Florida, LLC d/b/a/a Comcast Digital Phone

Company Code*: TX576

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter

**CLEC TABLE-2: DIGITAL ACCESS LINE COUNTS (not VGEs)
DO NOT INCLUDE UNE-P, RESOLD LINES, OR PRIVATE LINES IN THIS TABLE**

| 1 | 2 | 3 | 4 |
|----------------|------------|-----------|-------------|
| Exchange | Res or Bus | Line Type | Total Lines |
| Not Applicable | | | |

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-2:

A. The purpose of this table is to obtain a breakdown of digital access lines (reported in Table-1) by line type and actual line counts, not VGEs. **Do not include lines or channels, such as private lines, that are not connected to a switch.**

B. Each field must be populated. All entries must be made without quotation marks.

TABLE COLUMN INSTRUCTIONS:

Column 1. List exchanges in alphabetical order.

Column 2. Enter the abbreviation Res for Residential lines or Bus for Business lines. **Each service type must be entered in separate rows.**

Column 3. Enter Line Type as ISDN-BRI, ISDN-PRI, DS1, DS3, OC1, OC3, OCn (identify value of n), VOB (If you are providing voice over broadband service), etc. **Each type be entered in separate rows.**

Column 4. Enter actual line count total, not VGEs, in the Total Lines column without duplication. **EXAMPLE: Enter 1 for 1 DS1, 2 for 2 DS3s, etc. Each actual line count total must be entered in separate rows.**

FLORIDA PUBLIC SERVICE COMMISSION

2004 CLEC Data Request TABLE-3

(Data as of May 31, 2004)

Company Name: Comcast Phone of Florida, LLC d/b/a Comcast Digital Phone

Company Code*: TX576

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

CLEC TABLE-3: CLEC SWITCH DEPLOYMENT DATA

| 1 | 2 | 3 |
|----------------------------------|-------------------|---------------------------|
| Exchange where Switch is Located | Packet or Circuit | # of Switches in Exchange |
| Jacksonville | Circuit | 0 |
| Pompano | Circuit | 0 |

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-3:

A. The basis for this table is to obtain information about the switches you have deployed that are serving end-user customers in Florida. Please provide the requested information even if serving switch is located outside of Florida.

TABLE COLUMN INSTRUCTIONS:

Column 1. List exchanges in alphabetical order

Column 2. Enter Circuit or Packet to describe the type of switches located in the Exchange

Column 3. Enter the number of Circuit or Packet switches located in the exchange. The Grand Total of switches must be equal to the total number of switches, which you own and have deployed, that are being used to provide local exchange telecommunications service in Florida.