

FLORIDA PUBLIC SERVICE COMMISSION

2005 CLEC Data Request TABLE-1

(Data as of May 31, 2005)

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-1: ACCESS LINES (VGE Basis)

**DO NOT INCLUDE UNE-P, RESOLD LINES (INCLUDING THOSE SOLD UNDER COMMERCIAL AGREEMENTS), OR PRIVATE LINES IN THIS TABLE**

1	2	3	4	5
Exchange	Res or Bus	Method of Service	Commercial, Non-Commercial or N/A	Total VGE Lines
Grand Total				

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-1:

A. The purpose of this table is to obtain CLEC (including affiliate) retail access lines on a VGE basis, exclusive of UNE-P and resale (whether leased under an Interconnection Agreement or a Commercial Agreement).

B. An access line connects the end-user's customer premises equipment (CPE) to the serving switch and allows the end-user to originate and/or terminate local telephone calls on the public switched telephone network (PSTN). **DO NOT include UNE-P or Resold access lines (including those leased under a Commercial Agreement). Do include UNE-L and EELs obtained from ILECs even if leased under a Commercial Agreement.** 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/coaxial cable, fixed-wireless (free-space optics, microwave or satellite, etc.).

C. Each field must be populated. Do not use quotation marks.

D. 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://www.nanpa.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 link for the Eastern region and open file "EstCodes.zip", click on "FL" tab, then save it to a table in a database and run a query to capture all of your residential and business access line NPA-NXXs to identify their respective exchanges (shown in the "Rate Center" column of the NANPA's website).

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 type must be entered in separate rows.**

Column 3. Enter Method of Service as either SP (Self-Provisioned lines), NIL (lines obtained from non-ILECs), UNE-L, EEL (Include only Loop and not transport piece), or Other. **Each method must be entered in separate rows.**

Column 4. Enter either Commercial or Non-Commercial depending on how lines are being leased from the ILEC or N/A if no agreement applies.

Column 5. Enter line count as voice-grade equivalents (VGEs). 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 is not utilizing all 24 channels. If you bill a customer for 10 channels in a DS1, then the line count would be 10. Report 2 VGEs for each ISDN-BRI and 23 VGEs for each ISDN-PRI. Lines must be entered without duplication, e.g., Enhanced Extended Link (EEL) loops must not be included in UNE-L counts and vice versa. **Each line count must be entered in separate rows.**

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FLORIDA PUBLIC SERVICE COMMISSION

2005 CLEC Data Request TABLE-2

(Data as of May 31, 2005)

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-2: ACCESS LINE COUNTS (not VGEs)

DO NOT INCLUDE UNE-P, RESOLD LINES (INCLUDING THOSE SOLD UNDER COMMERCIAL AGREEMENTS), OR PRIVATE LINES IN THIS TABLE.

1	2	3	4	5
Exchange	Res or Bus	Line Type*	Commercial, Non-Commercial or N/A	Total Lines
			Total	

\*The information provided in Column 4 above reflects the number of lines of service purchased by customers in the referenced Florida exchanges. Comcast Digital Phone's lines are provisioned over Hybrid Fiber Coaxial facilities. Comcast Digital Phone does not maintain consolidated information regarding the number of lines or channels provided over individual Hybrid Fiber Coaxial cables. Development of such information would require a special study.

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-2:

A. The purpose of this table is to obtain a breakdown of access lines (reported in Table-1) by line type and actual line counts, not VGEs.

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 type must be entered in separate rows.

Column 3. For each line connected to the customer premises, enter Line Type as Analog, ISDN-BRI, ISDN-PRI, DS1, DS3, OC1, OC3, OCn (Identify value of n), xDSL (Identify x), etc. Include only those high speed lines that also provide voice. Each type must be entered in separate rows.

Column 4. Enter either Commercial or Non-Commercial depending on how lines are being leased from the ILEC or N/A if no agreement applies.

Column 5. Enter actual line count total, not VGEs, in the Total Lines column. EXAMPLE: Enter 1 for 1 Analog loop, 2 for 2 ISDN-PRI loops, etc. Each actual line count total must be entered in separate rows.

FLORIDA PUBLIC SERVICE COMMISSION

2005 CLEC Data Request TABLE-3

(Data as of May 31, 2005)

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	4
Exchange where Switch is Located	Packet or Circuit	Switches in Exchange	name of company providing
Grand Total			

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-3:

A. The purpose of this table is to obtain information about switches that are connected to access lines reported in Table-1. 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.

Column 4. If the switch is leased from another company, provide company name. If owned, please leave blank.

2005 Competitive Local Exchange Carrier (CLEC) Data Request  
(Due by July 15, 2005)

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

**Services Provided in Florida**

1. Do you provide local telephone service in Florida? Circle your response: Yes No
  
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/wireless service	<input type="checkbox"/> Broadband Internet access
  
3. If your company provides **prepaid** local telephone service, is this the only service you currently provide in Florida? Circle your response: Yes No NA (not applicable)

**Not Applicable. Comcast Phone does not provide pre-paid local telephone service in Florida.**

**Bundled Services**

4. Please complete the following table. For each residential and business package of bundled services you sell, list its name (e.g., Sprint Solutions), mark the included services, and enter the price and take rate. The take rate is calculated by dividing the number of customers that have subscribed to the corresponding package by the number of customers that can obtain that package from your company. Examples have been shaded.

THE BRACKETED INFORMATION BELOW IS COMCAST CONFIDENTIAL

Residential								Business							
Name of Package	Local	Long Distance	Broadband	Wireless	Video Service	Price	Take Rate	Name of Package	Local	Long Distance	Broadband	Wireless	Video Service	Price	Take Rate
Resphome	^	^			^	\$69.99	35%	COMCAST CONNECTIONS 180	X	X				\$38.95	[REDACTED]
COMCAST CONNECTIONS 180						\$40.95	[REDACTED]	COMCAST COMPLETE 180	X	X				\$40.95	[REDACTED]
COMCAST CONNECTIONS 300	X	X				\$43.95	[REDACTED]	COMCAST COMPLETE 300	X	X				\$45.95	[REDACTED]
COMCAST CONNECTIONS 300	X	X				\$48.95	[REDACTED]	COMCAST CONNECT ANY DIST	X	X				\$48.95	[REDACTED]
Buservice	^	^	^			\$89.99	25%								
N/A															

THE BRACKETED INFORMATION ABOVE IS COMCAST CONFIDENTIAL

\* Data supplied does not include grandfathered offerings.

## VoIP

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.

- Not offering VoIP service in Florida.
- Offering business VoIP services.
- Offering residential VoIP services.

If you are offering or providing VoIP service in Florida:

- a. Provide the exchanges where you are offering VoIP service.

**Not Applicable. See response above.**

- b. Provide residential price(s) for VoIP service.

**Not Applicable. See response above.**

- c. Provide 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:

- 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.

**Not Applicable. See response above.**

- f. 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.

### **Broadband Internet Access**

6. Information provided in your response to this question will be reported on an aggregate, statewide basis, not on a company-specific basis.

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

- a. Please provide the percentage of residential households to which your broadband service is available in your service area.

**Not Applicable. See response above.**

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

**Not Applicable. See response above.**

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

**Not Applicable. See response above.**

d. What type(s) of broadband connection(s) do you provide?

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

**Not Applicable. See response above.**

e. 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.

**Not Applicable. See response above.**

**Data Transfer Rate – Broadband Service**

<b>Residential</b>	<b>Downstream</b>	<b>Upstream</b>	<b>\$ Price/month</b>
<b>Business</b>	<b>Downstream</b>	<b>Upstream</b>	<b>\$ Price/month</b>

**FCC’s Triennial Review Remand Order**

7. The following questions relate to the FCC’s Triennial Review Remand Order (TRRO), released on February 4, 2005.

a. Has your business plan in Florida changed as a result of the TRRO? If so, how?

**No. Comcast Phone’s business plan has not changed as a result of the TRRO.**

b. If you are primarily a UNE-P provider do you expect to migrate to UNE-L, negotiate commercial agreements (to provide loop, switching, and transport), or change the focus of your business?

**Not applicable. Comcast Phone is not primarily a UNE-P provider.**



- c. Have you executed any commercially negotiated agreements with any carriers? If so, please identify the carriers.

**No. Comcast Phone has not executed any commercially negotiated agreements with any carriers.**

- d. Is there any other information (or comments) that you wish to provide?

**Not at this time.**

### **Mergers**

8. Several mergers have been announced in the past year, e.g., Sprint-Nextel, SBC-AT&T, and Verizon-MCI.

- a. Do you anticipate more mergers? Why or why not?

**As the Commission notes, several mergers of large telecommunications companies have been announced over the past year. These mergers are occurring notwithstanding -- and, possibly, because of -- continued market pressure on traditional telecommunications providers, in particular particular competitive local exchange companies and long distance companies. Comcast Phone would expect this merger trend to continue for so long as there are merger targets worth acquiring, namely, because mergers may provide the combined companies with greater synergies among traditionally separate but related lines-of-business, joint marketing opportunities, improved economies of scale, greater ubiquity, etc.**

- b. What effects do you believe these mergers (if approved) will have on local competition in Florida?

**Comcast Phone has no data or other information which would allow the Company to form an opinion as to the impact of the Sprint-Nextel, SBC-AT&T, or Verizon-MCI mergers on local competition in Florida.**

- c. Has your local competition strategy changed as a result of the merger announcements? If so, please explain how.

**No. Comcast Phone's local competition strategy in Florida has not changed as a result of the merger announcements.**

- d. How will these mergers (if approved) affect your local competition strategy in Florida?

**Comcast Phone has no plans to alter its local competition strategy in Florida as a result of these mergers (if approved).**

### **Miscellaneous**

9. In 2004, how much money did you invest in your network directly serving Florida's local service customers?

**Comcast Phone, the jurisdictional utility completing this report, does not own its own network facilities in the state of Florida.**

10. Are you currently operating under Chapter 7 or Chapter 11 protection?

**No. Comcast Phone is not currently operating under Chapter 7 or Chapter 11 protection**

11. If you filed Form 477 with the FCC to include data as of December 31, 2004, please provide us with a copy. This form only applies to CLECs with a minimum of 10,000 access lines in Florida.

**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.**

### **Comments**

12. 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 may be impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles.

**Yes. Comcast Phone has encountered obstacles that it believes impede the growth of local competition in the state. Comcast Phone believes that BellSouth's tactics in interconnection agreement negotiations impede the growth of competition. Comcast Phone has been negotiating with BellSouth for an interconnection agreement for a year and a half. In February 2004, well prior to the reversal of the FCC's "pick and choose" rule, Comcast Phone requested to sectionally adopt an effective interconnection agreement of another certified Florida CLEC. After several months of stalling and unresponsiveness, BellSouth claimed that the agreement could not be adopted until after it was amended to conform to the FCC's Triennial Review Order. By that time, the FCC was set to release its decision on "pick and**

choose,” and after six months of negotiations BellSouth claimed that they no longer had to offer the sectional adoption that Comcast Phone had requested six months earlier. Since that time, BellSouth has further stalled the negotiations proposing one amendment after another, claiming that significant sections of the agreement, which had already been subject to thorough and time-consuming negotiations between Comcast and BellSouth, had to be further modified to conform to the latest Court of Appeals or FCC decision. Comcast Phone continues to negotiate this very same agreement with BellSouth, eighteen months after requesting negotiations. BellSouth further impedes the timely adoption of interconnection agreements by requiring CLECs to adopt an interconnection agreement for every state where the underlying carrier’s agreement is applicable, in all states where the adopting carrier is also certificated to operate as a CLEC. By way of example, if Carrier A (which is certified in FL, GA and KY) requests to adopt the interconnection agreement of Carrier B (whose agreement covers all nine BellSouth states), BellSouth will refuse Carrier A’s request to adopt the agreement in Florida only (refusing Carrier A the right to adopt different effective agreements in Georgia and Kentucky). This requirement impedes CLEC choice and flexibility. Comcast Phone believes that BellSouth should be compelled to offer immediate adoptions of any effective interconnection agreement on file with the Florida Public Service Commission. The effective agreements could then be modified to conform to recent changes in law according to the change of law provisions included in the agreements.

13. 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.