

ORIGINAL

Matilda Sanders

From: Bell, Jayna [jbell@Covad.COM]
Sent: Wednesday, April 19, 2006 5:38 PM
To: Filings@psc.state.fl.us
Cc: Watkins, Gene
Subject: Electronic Filing in re Covad's Response to FPSC Order re Switched Access Rate Reduction Flow-Through
Importance: High
Attachments: Ltr to FPSC re Intrastate Switched Access Rate Reduction Flow Thru_(Rev 04.19.06).doc

Dear Commission Clerk:

Please accept the attached electronic document for the purpose of filing in the dockets set forth below. The information requested in the FPSC Electronic Filing Requirements is below.

Thank you.

A. Contact information of the person responsible for this electronic filing:

Jayna Bell
 Covad Communications Company
 1230 Peachtree Street, NE
 Suite 1900
 Atlanta, GA 30309
 (678) 528-6815 - office
 (678) 528-6805 - fax
 jbell@covad.com - Email

B. Docket Number(s) and Title(s) of Existing Dockets:

*In re: **Docket No. 030961-TI**, Flow-through of LEC Switched Access Reductions by IXCs, pursuant to Section 364.163(2), Florida Statutes.*

*In re: **Docket No. 030867-TL**, Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.*

*In re: **Docket No. 030868-TL**, Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.*

*In re: **Docket No. 030869-TL**, Petition for Implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.*

C. Name of the party on whose behalf this document is filed:

Charles E. Watkins
 Senior Counsel
 Covad Communications Company
 (Same Address as Above)
 (678) 528-6816 - office
 (678) 528-6806 - fax
 cwatkins@covad.com - Email

CMP _____
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D. Total number of pages in the document to be filed: 4

E. Brief description of document to be filed:

Letter attesting to the amount of intrastate switched access expense reduction it has received over the most recent twelve (12) months



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ORIGINAL

VIA ELECTRONIC TRANSMISSION

April 19, 2006

Blanca S. Bayo, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, FL 32399-0850

In re: **Docket No. 030961-TI**, Flow-through of LEC Switched Access Reductions by IXCs, pursuant to Section 364.163(2), Florida Statutes.

In re: **Docket No. 030867-TL**, Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.

In re: **Docket No. 030868-TL**, Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.

In re: **Docket No. 030869-TL**, Petition for Implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.

Dear Mrs. Bayo:

In accordance with the requirements and obligations contained in Order No. PSC-03-1469-FOF-TL, issued on December 24, 2003 (the "Order"), DIECA Communications, Inc. d/b/a Covad Communications Company ("COVAD") hereby submits a letter attesting to the amount of intrastate switched access expense reduction it has received over the most recent twelve (12) months.

COVAD provides voice and data communications products and services to consumers and businesses. COVAD provides these services throughout the United States in approximately 235 major metropolitan areas in 44 states, including Florida. COVAD's products and services include high-speed, or broadband, data communications, internet access connectivity, voice over internet protocol telephony, or VoIP, and a variety of related services. COVAD primarily uses digital subscriber line, or DSL, and DS-1, also referred to as T-1, technologies to deliver its services. In order to provide these services to consumers in the state of Florida, COVAD leases network elements, such as telecommunication lines and central office facilities, from the traditional

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Letter to Blanca S. Bayo
April 20, 2006
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incumbent local exchange companies, or ILECs, and other carriers, and then combines these network elements with our own nationwide network facilities. In the state of Florida, COVAD leases the majority of these network elements from Verizon Communications, Inc. (Verizon) and BellSouth Telecommunications, Inc. (BellSouth).

This Commission granted COVAD's applications to operate in the state of Florida both as an Interexchange Carrier (IXC) and as a Competitive Local Exchange Carrier (CLEC). While COVAD does indeed offer services to consumers in the state of Florida; it does not offer interexchange services that utilize intrastate switched access from BellSouth, Sprint or Verizon. Consequently, COVAD's intrastate switched access expense reduction is less than \$100 per month.

Thus, COVAD's understanding is that it not only is COVAD not subject to the requirements contained in the Commission's Order No. PSC-03-1469-FOF-TL, it is also not obligated to flow through any intrastate switched access rate reductions, nor is it obligated to file any revisions to its tariff as a result of the Order.

Please accept this letter as an e-filing on COVAD's behalf and please do not hesitate to contact me at the above number if you have any questions or concerns.

Sincerely,

s/ Charles E. Watkins

Charles E. Watkins
Senior Counsel
Covad Communications
gwatkins@covad.com

CEW/jlb

cc: Parties of Record

CERTIFICATE OF SERVICE
DOCKET NOS. 030961-TI, 030867-TL, 030868-TL, AND 030869-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic and US Mail this 20th day of April, 2006, to the following parties of record:

David Smith Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850	Nancy B. White BellSouth Telecommunications, Inc. c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: (850) 222-8640
Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6 th Avenue, Suite 100 Tallahassee, FL 32303 Phone: (850) 681-1990 Fax: (850) 681-9676 Email: mgross@fcta.com	MCI WorldCom Communications, Inc. Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: (850) 219-1018 Email: donna.mcnulty@wcom.com
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John Fons Ausley & McMullen, P.A. 227 South Calhoun Street Tallahassee, FL 32302	Michael B. Twomey AARP P.O. Box 5256 Tallahassee, FL 32314-5256 Phone: (850) 421-9530 Fax: (850) 421-8543 Email: miketwomey@talstar.com
Mark Cooper AARP 504 Highgate Terrace Silver Spring, MD 20904 Email: markcooper@aol.com	Verizon Florida, Inc. Mr. Richard Chapkis 201 N. Franklin Street, MCFLTC0007 Tampa, FL 33601 Phone: (813) 483-2606 Fax: (813) 204-8870 Email: Richard.chapkis@verizon.com

<p>Jason Rojas Richard Melson Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32309-0850</p>	<p>Radey Law Firm Susan Clark/Donna Blanton 313 North Monroe Street Suite 200 Tallahassee, FL 32301 Phone: (850) 425-6654</p>
<p>Messer Law Firm Floyd Self/Norman Horton P.O. Box 1876 Tallahassee, FL 32302-1876 Phone: (850) 222-0720 Fax: (850) 224-4359</p>	<p>Knology of Florida, Inc. John Feehan 1241 O.G. skinner Drive West Point, GA 31833-1789 Phone: (706) 634-2828 Fax: (706) 645-0148 Email: john.feehan@knology.com</p>
<p>Gray, Harris & Robinson Karen Jusevitch/C. Muniz/George Meros P.O. Box 11189 Tallahassee, FL 32302-9090 Phone: (850) 577-9090 Fax: (850) 577-3311 Email: kjusevitch@grayharris.com gmeros@grayharris.com</p>	<p>Common Cause Florida Ben Wilcox 704 West Madison Street Tallahassee, FL 32304 Email: cmncause@infionline.net</p>
<p>Office of the Attorney General Charlie Crist/Jack Shreve PL-01, The Capitol Tallahassee, FL 32399-1050</p>	<p>Sugarmill Woods Civic Association, Inc. 108Cypress Blvd. West Homosassa, FL 34446</p>
<p>Verizon Long Distance Micki Chen 1515 N. Courthouse Road, 5th Floor Arlington, VA 22201</p>	<p>Verizon Select Services, Inc. Anthony Gillman 201 N. Franklin Street, 37th Floor MCFLTC007 Tampa, FL 33602-5167</p>