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COMMUNICATIONS SERVICES

July 13, 2006

VIA OVERNIGHT MAIL

Beth W. Salak, Director
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

undocketed

RE: Response of Level 3 Communications, LLC to 2005 Local Competition Report Data Request

Dear Ms. Salak:

Enclosed please find the responses of Level 3 Communications, LLC ("Level 3") to the Commission's 2005 Local Competition Report Data Request. The responses have been placed in a sealed envelope and Level 3 requests that they be treated as confidential and proprietary pursuant to Florida Statute Section 364.183 (a). Pursuant to recent merger transactions, Wiltel Local Network, LLC (TX373) and Progress Telecom, LLC (TX648) are now operating subsidiaries of Level 3 Communications, LLC and therefore Level 3's responses are inclusive of any data from these two subsidiaries.

Please do not hesitate to contact me with any questions you may have.

- CMP 1
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH Leah Records

Sincerely,

Julie Ahrens

Julie Ahrens
Regulatory Paralegal

Enclosure

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

2006 Competitive Local Exchange Carrier (CLEC) Questionnaire

(Due by July 14, 2006)

Legal Company Name: Level 3 Communications, LLC

D/B/A: _____

FPSC Company Code (e.g., TX000) TX238

Contact name & title: Greg Rogers, Director of State Regulatory Affairs

Telephone number: 720-888-2512

E-mail address: greg.rogers@level3.com

Stock Symbol (if company is publicly traded): LVT

Services Offered in Florida

1. Do you offer local telephone service in Florida? Please check yes or no.
 Yes (note: Level 3 provides Enhanced Service Provider customers with the ability to exchange enhanced traffic with end-users on the PSTN through its local network interconnection arrangements)
 No

2. How is your local service provisioned? Please mark the appropriate response(s).
 Resale agreement with ILEC
 Agreement with ILEC for wholesale platform (formerly known as UNE-P).
 Purchase some UNEs (other than wholesale platform) from ILEC
 Purchase elements (e.g., loops, switching) from other than ILEC (e.g., other CLECs)
 Completely self-provisioned
 Other (please describe) _____

3. In what ILEC exchanges are you providing residential and/or business local service? Attached is the Exchange Check List (also available in electronic form) for your response.

4. **If you provision local service ONLY through ILEC resale or the ILEC's wholesale platform (formerly known as UNE-P), you DO NOT need to complete the data tables. Please indicate below whether or not you have completed any data tables.**
 Yes, my company HAS completed one or more data tables.
 No, my company IS NOT required to complete any data tables.

5. What services, other than local service, does your company offer in Florida? Check all that apply.
 Private line/special access
 VoIP
 Wholesale transport
 Wholesale loops
 Paging service
 Cable television

Interexchange service
 Cellular/wireless service

Satellite television
 Broadband Internet access

6. This question concerns **prepaid** local telephone service in Florida. Please place a check mark by the response that most accurately reflects whether or not you offer prepaid local telephone service.

Company offers ONLY prepaid local telephone service in Florida
 Company offers prepaid AND non-prepaid local telephone service in Florida
 Company does NOT offer prepaid local telephone service in Florida

Bundled Services

7. Do you offer bundled services to your Florida residential and business customers? For the purpose of this question, bundled services are specially priced packages that consist of local service plus at least one other feature (e.g., call waiting) or service (e.g., long distance or broadband or video). Please mark the applicable response(s).

Yes - Residential
 No - Residential
 Yes - Business
 No - Business

8. If you do offer bundled services, what is the percentage of your Florida residential and business customers that can purchase the bundles? Please provide the percentage below. If you do not offer bundled services, place a mark by "not applicable."

Residential
 Business
 Not applicable

9. If you do offer bundled services, what percentage of your Florida residential and business customers purchase the bundles? Please provide the percentage below. If you do not offer bundled services, place a mark by "not applicable."

Residential
 Business
 Not applicable

VoIP

10. Indicate below whether you are offering VoIP service to end users in Florida. VoIP service is defined as IP-based voice service provided over a digital connection. Check any that apply.

Not offering VoIP service to end users
 Offering VoIP services to business end users (**Note: Level 3 provides wholesale VoIP services to ESP customers in FL**)
 Offering VoIP services to residential end users

11. If you are offering VoIP service in Florida:

a. Where are you offering VoIP service, e.g., specific cities, counties, statewide, etc.?

- b. What is the range of prices for residential VoIP service?
 NA
- c. What is the range of prices for business VoIP service?
 NA
- d. Check all that apply to your VoIP service:
 - Offer wireless VoIP service
 - Offer wireline VoIP service
 - Optional power backup
 - Standard power backup
 - Contribute to Universal Service Fund
 - Peer-to-Peer only (no interconnection with PSTN).
 - Use of public Internet
 - Use of private IP network
- e. If you are not offering VoIP service to end-user customers in Florida, do you anticipate doing so? If yes, identify rollout month/year.

Level 3 provides wholesale VoIP services to ESP customers in FL

Broadband

12. Do you offer broadband to residential customers in Florida? Please place a mark by the applicable answer.
 Yes
 No
13. If you do offer broadband to residential customers in Florida, please provide the percentage of customers to whom broadband is available.

14. How many residential broadband subscribers do you have in Florida?

FCC's Triennial Review Remand Order (TRRO)

15. As of March 11, 2005, please provide the total number of UNE-P access lines for your company that were affected by the above order. **Level 3 does not have any UNE-P access lines**
16. As of March 11, 2006, please provide the number of UNE-P access lines that were transitioned in each of the categories below:
 - a. Migrated to a different platform (i.e., UNE-L or resale) _____
 - b. Renegotiated as part of a commercial agreement _____
 - c. No longer providing service _____
 - d. Not transitioned as of March 11, 2006, due to quantity, etc., but will be or has been transitioned to a different platform as subject to agreement with ILEC.

- e. Other (please explain below)
-

Mergers

17. The following questions concern the mergers that have taken place recently (e.g., Sprint-Nextel, SBC and AT&T, and Verizon and MCI, as well as the recently announced AT&T purchase of BellSouth).

- a. Has your overall local competition strategy changed as a result of the completed mergers? If so, please explain how.

Perhaps slightly.

Within the last 6 to 9 months, Level 3 has acquired or is in the process of acquiring the networks and business of other CLECs in certain regions in the country in part to improve its competitive stance and long term viability in the marketplace which may otherwise be threatened to a greater degree by the re-monopolization of the PSTN.

Level 3 is concerned that the increased control over the last-mile facilities may threaten the ability of competitive providers to offer their services. For example, over-the-top VoIP providers may be squeezed out by monopoly facilities based providers.

Level 3 will continue to advocate for a regulatory regime that allows for a robust competitive marketplace.

- b. Have these mergers affected your local competition strategy in Florida? If so, please explain how.

Please see response to 17a.

- c. How do you expect AT&T's purchase of BellSouth to affect your local competition strategy in Florida?

Please see response to 17a.

Miscellaneous

18. In 2005, how much money did you invest in your network directly serving Florida's local service customers? Place a check mark by the applicable answer.

\$1 - \$249,999

\$250,000 - \$999,999

\$1,000,000 - \$9,999,999

\$10,000,000 or more

19. Are you currently operating under Chapter 7 or Chapter 11 protection? Please indicate yes or no.

Yes
 No

20. Please provide a copy of the Form 477 you filed with the FCC with data as of December 31, 2005.



Comments

21. 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. Any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida are welcome.

The single largest barrier that can be erected to prevent effective competition in Florida is the refusal by an Incumbent LEC to interconnect its network on fair, reasonable and nondiscriminatory terms. Because the majority of ILECs continue to enjoy an effective monopoly of the telecommunications market and the facilities that reach the majority of the market, they continue to be able to wield monopoly power in interconnection negotiations and arbitrations. Without regulatory oversight that enforces the ability to exchange traffic on fair, reasonable and nondiscriminatory terms, competitors are at a distinct and perhaps insurmountable disadvantage. If competitive providers cannot offer the ability to reach consumer on the PSTN in an economically rational fashion, their service offerings will flounder.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]