

Matilda Sanders

From: Bell, Jayna [jbell@Covad.COM]
 Sent: Thursday, January 04, 2007 10:04 AM
 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 for 2006
 Importance: High
 Attachments: Ltr to FPSC re 2006 Intrastate Switched Access Expense Reduction (01.04.07).doc

ORIGINAL

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.

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- RCA _____ C.
- SCR _____
- SGA _____
- SEC 1
- OTH Kim P.

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

Charles E. Watkins
 Senior Counsel
 Covad Communications Company
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D. Total number of pages in the document to be filed: 2

E. Brief description of document to be filed:

DOCUMENT NUMBER-DATE
 00089 JAN-4 5
 FPSC-COMMISSION CLERK

Letter attesting to the amount of intrastate switched access expense reduction it has received over the most recent twelve (12) month period from 1/1/06 through 12/31/06



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ORIGINAL

VIA ELECTRONIC TRANSMISSION

January 4, 2007

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 IXC's, 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") and the Commission's letter dated October 12, 2006 (the "Letter"), DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), by its undersigned counsel, and in accordance with the Order, hereby submits a letter attesting to the amount of intrastate switched access expense reduction it has received over the most recent twelve (12) months.

Further, Covad hereby attests to the following:

- Covad received authority in 2003 to operate as an Interexchange Carrier pursuant to PAA Order No. PSC-03-0575-PAA-TI issued May 6, 2003 and consummated by Order No. PSC-03-0656-CO-TI issued May 29, 2003, both under Docket No. 030143-TI.
- For the period from January 1, 2006 through December 31, 2006, Covad's intrastate switched access expense reduction was less than \$100. As such, Covad is not obligated to flow through the reduction in intrastate switched access charges and is not subject to the Order's tariff revision requirements.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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 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 BellSouth Telecommunications, Inc. (BellSouth) and Verizon Communications, Inc. (Verizon).

Thus, Covad's understanding is that: (a) Covad is not subject to the requirements contained in the Commission's Order No. PSC-03-1469-FOF-TL; (b) Covad is not obligated to flow through any intrastate switched access rate reductions; and (c) Covad is not 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 ensure that it is filed in the above-referenced dockets. Feel free 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: Beth W. Salak, Director, Division of Competitive Markets & Enforcement
Sally A. Simmons, Chief, Bureau of Telecommunications, Arbitrations and Tariffs
Frank Trueblood, Regulatory Analyst