

ORIGINAL

RECEIVED-FPSC

07 JAN 23 AM 9:14

EMBARQ™

Voice | Data | Internet | Wireless | Entertainment

COMMISSION  
CLERK

Embarq Corporation  
Mailstop: FTLHQ0102  
1313 Blair Stone Rd.  
Tallahassee, FL 32301  
EMBARQ.com

07 JAN 22 PM 4:59

RECEIVED-FPSC

COMMISSION  
CLERK

January 22, 2007

Ms. Blanca Bayó, Director  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket No. 060763-TL, Embarq's Response to Treviso Bay Development's First Set of Interrogatories and First Request for Production of Documents.

Dear Ms. Bayó:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's Response to Treviso Bay Development's First Set of Interrogatories and First Request for Production of Documents.

- CMP 1
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL 1
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

*Susan S. Masterton*

Susan S. Masterton

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00584 JAN 23 09

FPSC-COMMISSION CLERK

FILE 1/23, INADVERTENTLY  
TAKEN BACK BY EMBARQ  
REFILED NEXT DAY  
RECEIVED & FILED  
*mas*

FPSC BUREAU OF RECORDS

Susan S. Masterton  
COUNSEL  
LAW AND EXTERNAL AFFAIRS- REGULATORY  
Voice: (850) 599-1560  
Fax: (850) 878-0777

**CERTIFICATE OF SERVICE  
DOCKET NO. 060763-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic, Hand Delivery (+) and US Mail (\*) this 22<sup>nd</sup> day of January, 2007 to the following:

Jason Fudge (\*)  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[jfudge@psc.state.fl.us](mailto:jfudge@psc.state.fl.us)

Dale Buys  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[dbuys@psc.state.fl.us](mailto:dbuys@psc.state.fl.us)

David Dowds  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[ddowds@psc.state.fl.us](mailto:ddowds@psc.state.fl.us)

Ray Kennedy  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[rkennedy@psc.state.fl.us](mailto:rkennedy@psc.state.fl.us)

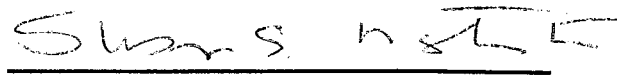
Richard Wright  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[rwright@psc.state.fl.us](mailto:rwright@psc.state.fl.us)

Robert Casey  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[bcasey@psc.state.fl.us](mailto:bcasey@psc.state.fl.us)

Sally Simmons  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[ssimmons@psc.state.fl.us](mailto:ssimmons@psc.state.fl.us)

Treviso Bay Development, LLC (\*)  
Christopher Cramer/Sanjay  
Kuttemperoor  
c/o V.K. Development Corporation  
19275 W. Capitol Drive, Suite 100  
Brookfield, WI 53045  
[ccramer@vkdevelopment.com](mailto:ccramer@vkdevelopment.com)  
[sanjay@vkdevelopment.com](mailto:sanjay@vkdevelopment.com)

Young Law Firm (\*) (+)  
R. Scheffel Wright  
225 South Adams Street, Suite 200  
Tallahassee, FL 32301  
[swright@yvllaw.net](mailto:swright@yvllaw.net)


  
\_\_\_\_\_  
Susan S. Masterton

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for waiver of carrier of last resort obligations for multitenant property in Collier County known as Treviso Bay, by Embarq Florida, Inc.	Docket No. 060763-TL
--	----------------------

**NOTICE OF SERVICE**

Embarq Florida, Inc. serves this notice that, by and through undersigned counsel, it has served its Response to the Treviso Bay Development's First Set of Interrogatories and First Request for Production of Documents by Hand Delivery to R. Scheff Wright at 225 South Adams Street, Suite 200, Tallahassee, FL 32301 and electronically at [swright@yvlaw.net](mailto:swright@yvlaw.net) on this 22<sup>nd</sup> day of January 2007.



---

Susan S. Masterton  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Voice: 850-599-1560  
Fax: 850-878-0777  
[susan.masterton@embarq.com](mailto:susan.masterton@embarq.com)

Counsel for Embarq Florida, Inc.

**Response:** Depreciation of circuit digital pair gain/digital loop carrier investment on Florida books is based upon a Projection Life of 9.0 years. Industry depreciation specialists such as Technology Futures, Inc. concur with a lives of that length, as evidenced by Figure 6.2 in the response to POD #4 showing 0% surviving DLC's in a 10 year time span (placement in 2004 – no survivors in 2014). Given these depreciation statistics, a life shorter than 10 could have been chosen for the Treviso Bay analysis, but a conservative estimate of 10 was selected.

5. **Refer to Embarq's response to Staff Data Request No. E-1, number 10 (x). Provide a complete description of the DLC unit, including model number and any other configuration-specific information, that Embarq assumes to be installed in year 1 (only the manufacturer is identified in Embarq's response to Staff).**

**Response:** The device is a [REDACTED] housed in an [REDACTED] cabinet. See POD #5.

6. **Refer to the December 13, 2006 Direct Testimony of Michael J. Dechellis, page 6. Is the "Embarq – Florida Market Share Study Summer 2006" proprietary document the only source of the market share assumption stated on line 4? If no, identify and provide any and all other documents relied upon by Embarq and Mr. Dechellis to develop the market share assumption shown on line 3.**

**Response:** Yes.

7. **Refer to the "Embarq – Florida Market Share Study Summer 2006" proprietary document. Has Embarq performed a comparable or similar analysis for any markets not shown on this chart? If yes, identify and provide the analysis and any related information for any and all markets in the same format as provided on the "Embarq – Florida Market Share Study Summer 2006" proprietary document.**

**Response:** Please see the attachment for POD 7. The markets included in this analysis are not comparable or similar to the situation faced in Treviso Bay, principally because the availability date for cable telephony was well past when Embarq facilities were placed or is not available to the development. In addition, other developments have had limited construction activity upon which market share conclusions could be based. Therefore, the market share information for these developments is not instructive to the conditions faced in Treviso Bay where cable telephony will be available simultaneously with Embarq's voice service if it were required to place its facilities. Further, because of the bulk agreement for video and high speed data, residents of Treviso Bay will have the opportunity to establish all services (voice, video and high speed data) with Comcast on day one. This is in contrast to the customers in the developments shown on the attachment to POD 7 who would be required to change carriers after their move-in if they wanted to subscribe to cable telephony service. For these reasons, the information included on POD 7 was not utilized in developing Embarq's market share assumption for the Treviso Bay NPV analysis.

DOCUMENT NUMBER-DATE

00584 JAN 23 5

4. **With reference to Embarq's response to Staff Data Request No. E-1, number 10(i), please provide:**
- (a) **All documents relating to the expected useful life of DLC equipment; and**
  - (b) **All documents, including all supporting documentation, that Embarq would contend support Embarq's assumption that "the expected useful life of DLC equipment is estimated at ten years."**

**Response:** See attached – Parameter Report (internal), Technology Futures, Inc "Transforming the Local Exchange Network" (external).

5. **With reference to Embarq's response to Staff Data Request No. E-1, number 10 (x), please provide all documents that describe the DLC unit, including model number and any other configuration-specific information, that Embarq assumes to be installed in year 1. (Only the manufacturer is identified in Embarq's response to Staff's data requests.)**

**Response:** Most information is provided in Interrogatory #5 [REDACTED]. See attached vendor part number description for the [REDACTED] cabinet.

6. **Please refer to the December 13, 2006 Direct Testimony of Michael J. Dechellis, page 6. If the "Embarq – Florida Market Share Study Summer 2006" proprietary document is not the only source of the market share assumption stated on line 3, please provide any and all other documents relied upon by Embarq and Mr. Dechellis to develop the market share assumption shown on line 3.**

**Response:** NA, see Interrogatory #6.

7. **Please refer to the "Embarq – Florida Market Share Study Summer 2006" proprietary document. If Embarq has performed any comparable or similar analyses for any markets not shown on this chart, please provide copies of the analysis and any related information, including workpapers and any documents supporting any assumptions used in such analyses, for any and all markets in the same format as provided on the "Embarq – Florida Market Share Study Summer 2006" proprietary document.**

**Response:** See attached.

SPRINT FLORIDA INCORPORATED  
 CURRENT

PARAMETER REPORT

ACCOUNT NUMBER	CLASS or SUBCLASS of PLANT	PROJECTION LIFE	IOWA CURVE SHAPE	FIRST ELG YEAR	AVG. REM. LIFE	AVG SERVICE LIFE	FUTURE NET. SALVAGE	AVERAGE NET. SALVAGE
2112.1	Passenger Cars		WHOLE LIFE RATE					
2112.2	Light Trucks		WHOLE LIFE RATE					
2112.3	Heavy Trucks		WHOLE LIFE RATE					
2114	Special Purpose Vehicles		WHOLE LIFE RATE					
2116.1	Work Equipment		WHOLE LIFE RATE					
2121.1	Buildings		IOWA R3.0					
2121.3	Building Equipment		IOWA R2.0					
2121.4	Antenna Supp and Towers		IOWA R2.0					
2122.12	Furniture		WHOLE LIFE RATE					
2123.1	Office Support Equipment		WHOLE LIFE RATE					
2123.2	Co Communications Equipment		WHOLE LIFE RATE					
2124.1	General Purpose Computers		WHOLE LIFE RATE					
2212	Digital Switching		IOWA L0.0/AMORT					
2212.8	Switch - Generic Software		SQUARE CURVE					
2213.1	Packet Switching-Call Server		WHOLE LIFE RATE					
2213.2	Packet Switching-ATM		WHOLE LIFE RATE					
2213.3	Packet Switching- Trunk Gateway		WHOLE LIFE RATE					
2213.4	Packet Switching-Line Gateway		WHOLE LIFE RATE					
2213.8	Packet Switching-Software		WHOLE LIFE RATE					
2213.9	Packet Switching-Frame Relay		WHOLE LIFE RATE					
2220.1	Operator Systems		WHOLE LIFE RATE					
2231.3	Radio Other		IOWA S3.0					
2232.1	Circuit Analog		IOWA R3.0					
2232.2	Circuit Digital		IOWA L0.0					
2232.3	Circuit Other		IOWA L0.0					
2232.5	Circuit Digital-Digital Pair		IOWA L0.0					
2232.9	DSLAM Equipment		IOWA R3.0					
2362.1	Subs Multiplex		WHOLE LIFE RATE					
2362.2	Line Conditioning		WHOLE LIFE RATE					
2362.3.4	Other Terminal Equipment		WHOLE LIFE RATE					
2411.1	Poles		IOWA L0.0					
2421.1	Aerial-Met.		IOWA L0.5					
2421.2	Aerial-Non Met.		IOWA R2.0					
2422.1	Underground-Met.		IOWA L0.5					
2422.2	Underground-NonMet.		IOWA R3.0					
2423.1	Buried Met.		IOWA L0.0					
2423.2	Buried NonMet		IOWA R2.5					
2424.1	Submarine Cable-Metal		IOWA L0.0					
2424.2	Submarine Cable-Fiber		IOWA R2.5					
2426.1	Intrabuilding Cable-Metal		IOWA R2.0					
2426.2	Intrabuilding Cable-Fiber		IOWA R3.0					
2441.1	Underground Conduit		IOWA R3.0					

Embarq – Florida  
Network Planning Material Description

Embarq's Response to Treviso Bay's  
POD No. 5

**REDACTED**

Proprietary and Confidential

Embarq - Florida  
Market Share Study  
Summer 2006

Additional Developments

Embarq's R POD 7

Wire Center	Competitor	Cable Internet Phone	When Cable Internet Phone Offered	Development Name	Single Family or Multi Family	When Embarq Voice Facilities Placed	June-July 2006 Data		
							Development Number of Lots (NSAs) Facilities Placed	Number with Embarq Service	% EMBARQ Service to Total NSAs
[Redacted Data]									