

REDACTED

09000-07

PUBLIC

2009 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by April 15, 2009)¹

Legal Company Name: DIECA Communications, Inc.

D/B/A: Covad Communications Company

FPSC Company Code (e.g., TX000) : TX237

Contact name & title: Lael Atkinson, Senior Paralegal

Telephone number: (512) 514-6382

E-mail address: latkinso@covad.com

Stock Symbol (if company is publicly traded): N/A

Services Provided in Florida

- 1. Do you provide local telephone service in Florida? Please check yes or no.
 Yes
 No

- 2. Please complete the data tables.

Response: Table 5 (VoIP) is the only data table that applies to the services offered by Covad. That table is attached.

- 3. How is your local service provisioned? Please mark the appropriate response(s).

- Resold lines from ILEC
- Wholesale platform (formerly known as UNE-P)
- UNEs (other than wholesale platform) from ILEC
- Elements (e.g., loops, switching) from other than ILEC (e.g., other CLECs)
- Completely self-provisioned
- Other (please describe) _____

Response: Not applicable – Covad does not provide local service. However, for the provision of broadband and VoIP services, Covad utilizes UNEs (e.g., loop, dedicated transport) from ILECs (other than wholesale platform).

COM _____
 ECR _____
 GCL _____
 OPC _____
 RCP _____
 SSC _____
 SGA _____
 ADM _____
 CLK _____

¹ The due date is established by Section 364.386(1)(b), Florida Statutes. Failure to comply with this rule may result in the Commission assessing penalties of up to \$25,000 per offense, with each day of noncompliance constituting a separate offense per Section 364.285(1), Florida Statutes.

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4. What services, other than local service, does your company offer in Florida? Please check all that apply.

- | | |
|--|---|
| <input type="checkbox"/> Private line/special access | <input type="checkbox"/> Wholesale loops |
| <input checked="" type="checkbox"/> VoIP | <input type="checkbox"/> Fiber or copper based video service |
| <input type="checkbox"/> Wholesale transport | <input type="checkbox"/> Cable television |
| <input type="checkbox"/> Interexchange service | <input type="checkbox"/> Satellite television |
| <input type="checkbox"/> Cellular/wireless service | <input checked="" type="checkbox"/> Broadband Internet access |

5. This question concerns **prepaid** local telephone service in Florida. Please place a check 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

6. What percentage of your Florida residential and business customers purchase bundled (i.e. voice service packaged with additional services such as internet or video service) offerings? Please provide the percentage below. Do not include bundles of telecom-only services. If you do not offer bundled services, indicate "not applicable."

- Residential
 Business
 Not applicable

VoIP

7. 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. Please check any that apply.

- Not offering VoIP service to end users
 Offering VoIP services to business end users
 Offering VoIP services to residential end users

8. If you are offering VoIP service in Florida, please check all that apply:

- Peer-to-Peer only (no interconnection with PSTN)
 Use of public Internet
 Use of private IP network

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Broadband

9. Do you offer broadband to residential customers in Florida? Please check the applicable answer.

 X Yes
 No

10. If you do offer broadband to residential customers in Florida, please provide your best estimate of the percentage of residential end user premises in your Florida service area for which your broadband services are available.

Response: Covad is unable to provide a percentage. However, Covad is collocated in approximately 117 central offices in Florida and can generally serve the entire coverage area of each of those central offices with some type of broadband service, subject to loop qualification status and other technical or logistic limitations.

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

Response: Covad currently has [REDACTED] residential broadband subscribers in Florida.

12. Please list the method(s) of broadband provisioning utilized in Florida by your company (i.e. DSL, cable modem, fiber, etc.).

Response: UNE xDSL and T-1

13. What are the typical downstream and upstream speeds for your most popular broadband service?

Response: Covad offers several broadband services. The descriptions of Covad's broadband services and their download and upload speeds can be found at <http://www.covad.com/web/services/index.html>.

14. What is the monthly price for your most popular residential broadband service?

Response: Covad offers several broadband services that may be available to users at residential locations (subject to local line conditions and related technical and other limitations). The pricing options for Covad's broadband services can be found at <http://www.covad.com/web/services/index.html> (posted prices may vary depending upon location and other variables).

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Fiber Deployment

15. Did you deploy fiber to homes or businesses in Florida between December 31, 2007 and December 31, 2008?

 Yes
 X No

16. Please provide the number of new residential and business subscribers served by Fiber to the Home, Fiber to the Premises, and/or Fiber to the Curb technology since the last reporting period.

 0 Residential Subscribers
 0 Business Subscribers
 0 Total

17. Please provide your company's total number of residential and business subscribers currently served by Fiber to the Home, Fiber to the Premises, and/or Fiber to the Curb technology.

 0 Residential Subscribers
 0 Business Subscribers
 0 Total

Miscellaneous

18. In calendar year 2007, how much money did you invest in your network directly serving Florida's local service customers? Please check the applicable answer.

Response: Not applicable - Covad does not provide local service in Florida.

 \$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 check yes or no.

 Yes
 X No

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20. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2008**

Response: See Attached.

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.

Response: Covad requires the continued availability of UNEs (*e.g.*, loop, transport) at just and reasonable TELRIC-based rates which enable it to provide competitive offerings for broadband and VoIP services to consumers in Florida. When ILECs make the availability of UNEs difficult to obtain (*e.g.*, OSS non-availability; UNE unavailability due to "facilities not available"; extended service intervals for pre-ordering, ordering, provisioning, maintenance and repair, and collocation that detrimentally affect Covad's ability to provide service to its customers or extends an out-of-service situation), then Covad is harmed. Each act, albeit perceived to be small, cumulatively becomes a barrier to entry – particularly when the ILEC retains the monopoly on providing the UNE facility. In addition, Covad submits that barriers to entry apply to the small and business market as well, when often all that is reviewed are market penetration in the residential market. Therefore, Covad submits that it is important to ensure that when market analysis is performed, that the small and medium-sized business markets are reviewed independently from residential markets.

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Form 477 Submission for FRN: 3753753, Company: Covad Communications Company, State: FL, Operations: Non-ILEC

All filers must complete Items 1 through 11 below

Data Description	Value
Data as of	Dec 31, 2008
1. FRN	[REDACTED]
2. Company	Covad Communications Company
3. Type of Operations	Non-ILEC
4. Use this drop-down list to select a single name, such as the holding company, to identify all commonly-owned or commonly-controlled filers. Commonly-controlled filers with no holding company should decide on a single name to use for this question. If not affiliated with any other filer, select "same as company name". Select "not shown" if no appropriate name appears in the list.	Covad Communications Group, Inc. <input checked="" type="checkbox"/>
If you selected "not shown" above, provide the appropriate name.	
5. State	FL
6. Contact person (person who prepared the submitted data)	Stefanie Santa-Esparza
7. Contact person telephone number and email address	Phone: 408-952-7394 Email: ssanta@covad.com
8. Status of submission	Original - In Progress
9. Indicate whether you request non-disclosure of some or all of the information in this submission because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.	<input type="radio"/> No <input checked="" type="radio"/> Yes
10. Official (corporate officer, managing partner, or sole proprietor) whose signature certifies that he/she has	

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<p>examined the information contained in this Form 477 and that, to the best of his/her knowledge, information and belief, all statements of fact contained in this Form 477 are true and correct. For purposes of this Form 477, the entry of the official's name on this line shall constitute that official's electronic signature to this certification. Persons making willful false statements in a Form 477 can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).</p>	<div style="border: 1px solid black; height: 100px; width: 100%;"></div> <div style="border: 1px solid black; padding: 2px;">Jeff Bailey</div>
<p>11. Certifying official telephone number and email address</p>	<p>Phone. <input type="text" value="408-952-7513"/></p> <p>Email. <input type="text" value="jbailey@covad.com"/></p>

Form 477 Submission for FRN: 3753753, Company: Covad Communications Company, State: FL, Operations: Non-ILEC, Data as of: Dec 31, 2008

Part I.A: Broadband - Asymmetric xDSL

In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and/or send information to the Internet at information transfer rates exceeding 200 kbps in at least one direction. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

(1)	(2)	(3)	(4)	(5)
Total connections to end users that you (including affiliates) equipped as broadband over your own local loop facilities or the equivalent, or over UNE loops or other facilities you obtained from an unaffiliated entity. Do not convert lines into a voice-grade-equivalent measure.	Percentage of (1) that you (including affiliates) equipped over your own local loop facilities or the equivalent	Percentage of (1) that are billed (or incorporated in a service billed) to end users by you, or your affiliates or agents	Percentage of (1) that connect to residential end users	Percentage of (1) that connect to residential end users and have information transfer rates exceeding 200 kbps in both directions
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Break down the total connections reported in (1) to show the number in each of the following speed tiers.

Connections reported in **EACH** data cell below must equal the sum of Asymmetric xDSL connections reported in Part VI by Census Tract, for that download/upload combination, and the sum of **ALL** data cells below must equal the total connections reported in (1).

	Download information transfer rate to the end user (8 categories):							
	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Upload information transfer rate from the end user (9 categories):	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to 200 kbps	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Greater than 200 kbps and less than 768 kbps	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Greater than or equal to 768 kbps and less than 1.5 mbps	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

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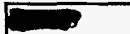


Greater than or equal to 1.5 mbps and less than 3 mbps							
Greater than or equal to 3 mbps and less than 6 mbps							
Greater than or equal to 6 mbps and less than 10 mbps							
Greater than or equal to 10 mbps and less than 25 mbps							
Greater than or equal to 25 mbps and less than 100 mbps							
Greater than or equal to 100 mbps							

This is the end of PART I.A for Asymmetric xDSL. If you are an ILEC you MUST ALSO complete Part I.B for xDSL (asymmetric or symmetric).

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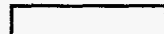

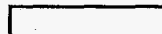


Part I.A: Broadband - Symmetric xDSL

In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and send information to the Internet at information transfer rates exceeding 200 kbps in both directions. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

(1)	(2)	(3)	(4)	(5)
Total connections to end users that you (including affiliates) equipped as broadband over your own local loop facilities or the equivalent, or over UNE loops or other facilities you obtained from an unaffiliated entity. Do not convert lines into a voice-grade-equivalent measure.	Percentage of (1) that you (including affiliates) equipped over your own local loop facilities or the equivalent	Percentage of (1) that are billed (or incorporated in a service billed) to end users by you, or your affiliates or agents	Percentage of (1) that connect to residential end users	Percentage of (1) that connect to residential end users and have information transfer rates exceeding 200 kbps in both directions
				

Break down the total connections reported in (1) to show the number in each of the following speed tiers.

Connections reported in **EACH** data cell below must equal the sum of Symmetric xDSL connections reported in Part VI by Census Tract, for that information transfer rate category, and the sum of **ALL** data cells below must equal the total connections reported in (1).

Information transfer rate to and from the end user (8 categories):							
(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
							

This is the end of PART I.A for Symmetric xDSL. If you are an ILEC you MUST ALSO complete Part I.B for xDSL (asymmetric or symmetric).

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Part I.A: Broadband - Other Wireline

In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and send information to the Internet at information transfer rates exceeding 200 kbps in both directions. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

Notes specific to Other Wireline: This category includes all copper wire-based technologies other than DSL. Ethernet over copper and T-1 are examples.

(1)	(2)	(3)	(4)	(5)
Total connections to end users that you (including affiliates) equipped as broadband over your own local loop facilities or the equivalent, or over UNE loops or other facilities you obtained from an unaffiliated entity. Do not convert lines into a voice-grade-equivalent measure.	Percentage of (1) that you (including affiliates) equipped over your own local loop facilities or the equivalent	Percentage of (1) that are billed (or incorporated in a service billed) to end users by you, or your affiliates or agents	Percentage of (1) that connect to residential end users	Percentage of (1) that connect to residential end users and have information transfer rates exceeding 200 kbps in both directions
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Break down the total connections reported in (1) to show the number in each of the following speed tiers.

Connections reported in **EACH** data cell below must equal the sum of Other Wireline connections reported in Part VI by Census Tract, for that information transfer rate category, and the sum of **ALL** data cells below must equal the total connections reported in (1).

Information transfer rate to and from the end user (8 categories):							
(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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Part II.B: Interconnected VoIP Service

See instructions for definitions of terms used in this Part. If you report end user subscriptions in (1) - (2), you must also complete Part V of Form 477.

Reporting by State: Subscriptions reported in (1) must be reported in the state of the subscriber's "Registered Location" as of the data-collection date. (This is the most recent information obtained by an interconnected VoIP service provider that identifies the physical location of the end user. See 47 C.F.R. § 9.3.) Subscriptions reported in (2) must be reported in the same state as the broadband connection purchased in conjunction with the VoIP service.

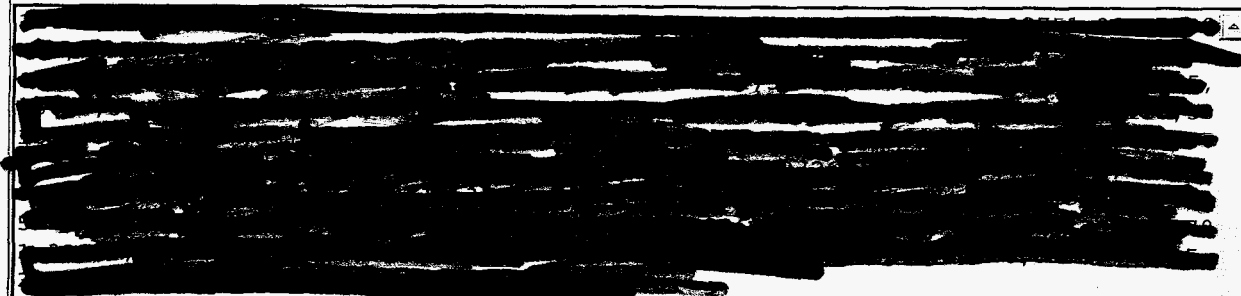
	(1) VoIP subscriptions that end users purchased from you without also purchasing a broadband connection from you	(2) VoIP subscriptions that end users purchased from you in conjunction with the purchase of a broadband connection	(3) Wholesale customers who purchased your VoIP service to resell as their own VoIP service
(a) Total number. See instructions on what to include.	[Redacted]	[Redacted]	[Redacted]
(b) Percentage of (a) provided under residential grade service plans	[Redacted]	[Redacted]	
(c) Percentage of (a) purchased under terms that allow use with any broadband connection ("nomadic" functionality)	[Redacted]	[Redacted]	
(d) Percentage of (a) provided in conjunction with a copper wire-based broadband connection (DSL or Other Wireline)		[Redacted]	
(e) Percentage of (a) provided in conjunction with a fiber-to-the-end user broadband connection		[Redacted]	
(f) Percentage of (a) provided in conjunction with a Cable Modem broadband connection		[Redacted]	
(g) Percentage of (a) provided in conjunction with a fixed wireless broadband connection		[Redacted]	
(h) Percentage of (a) provided in conjunction with any other type of broadband connection		[Redacted]	

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Part V: Zip Code Information -- Local Voice Telephone Service and Interconnected VoIP

If you reported local exchange telephone lines in service to your end user customers, in Part II.A (1), or VoIP subscriptions that end users purchased from you, in Part II.B (1) or (2), you must list the 5-digit ZIP Codes in the state in which you had end user customers. Do not include any ZIP Codes in which you offered your local exchange telephone or VoIP service but had no end user customers, and do not include any out-of-state ZIP Codes.

Type all five digit ZIP codes in the following text box, separated by either commas, spaces, or carriage returns:



Save and Return to Edit Menu

[Form 477 Home](#)