

David M. Christian
Vice President - Regulatory Affairs

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February 12, 2010

Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 090550-TL – Petition for variance from Rules 25-4.0185 and 25-4.073, F.A.C. by Verizon Florida LLC. – Data Request No. Verizon – 1 (Nos. 1-8)

Dear Ms. Cole:

Attached is Verizon Florida LLC's response to staff's February 8, 2010 data request in Docket 090550.

This filing includes two redacted copies of the response and one confidential copy in a separate envelope. Verizon considers this information to be confidential as it contains proprietary information that could be used by competitors to gain an unfair competitive advantage. Therefore, this filing is made under a Claim of Confidentiality pursuant to F.S. 364.183(1) and Rule 25-22.006(5). Verizon understands the information must be kept confidential until returned to Verizon.

If you have any questions or concerns, please feel free to contact me at (850) 224-3963.

Sincerely,

David M. Christian
Vice President – Regulatory Affairs

COM _____
APA _____
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This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 00980-10. The document is in locked storage pending advise on handling. To access the material, your name must be on the CASR. If undocketed, your division director must provide written permission before you can access it.

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DOCKET NO. 090550-TL

Verizon's Responses to Staff's Data Requests (Nos. 1-8)

Verizon Florida LLC ("Verizon") responds as follows to Staff's data requests:

1. The definition of Basic Local Telecommunications Service in Section 364.02, F.S., in part requires that access be provided to all locally available interexchange companies. Please identify the method(s) (dialing pattern) that consumers may use to gain access to locally available interexchange companies.

Response: Verizon basic local telecommunications service customers may use the following dialing patterns to make long distance calls using the interexchange carrier of their choice:

- A. 1+10 digits (IXC preselected)
- B. 1+8XXX NXX-XXXX
- C. 1010XXX=1=10 digits
- D. 0+NPA-NXX-XXXX
- E. Calling Cards

2. For each customer example provided in the table below, please state, using Y (Yes) or N (No), if the customer is eligible for protection under the Commission's SQRs with Verizon's proposed variance. Assume the customer has Verizon's dial tone and only has the specific feature or only completes a specific act as presented in the table.

Response: Verizon seeks a variance so that it may continue to report SQR data based on all of Verizon's basic and nonbasic residential customers while Verizon makes the systems changes necessary to collect and report SQR data exclusively for basic customers. Accordingly, during the period for which the variance is in place, Verizon would continue to report this data as it has in the past.

Following the variance period, Verizon would comply with the Commission's SQRs, consistent with its decision in Docket No. 0904761. Verizon's understanding of the Commission's ruling in that docket is reflected in the chart below:

No.	Feature	SQR Eligible	Rationale Label
a.	Inside wire maintenance	N	A
b.	Caller ID	N	B
c.	Call Forwarding	N	B
d.	Call Waiting	N	B
e.	Any combination of Caller ID/Call Forwarding/Call Waiting	N	B
f.	Caller ID Blocking	N	B
g.	Anonymous Call Rejection	N	B
h.	Three-way calling	N	B
i.	Return Call	N	B

DOCKET NO. 090550-TL

00979 FEB 12 2010

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No.	Feature	SQR Eligible	Rationale Label
j.	Repeat Dial	N	B
k.	Call Trace	N	B
l.	User-ordered third party product submitted by a clearinghouse and billed via the LEC	Y	C
m.	Verizon Internet Service	N	A
n.	Verizon Unlimited toll calling plan (With LPIC/PIC)	N	A
o.	PIC and LPIC to Verizon LD without selection of a Verizon calling plan	N	A
p.	PIC and LPIC to Verizon LD with selection of a Verizon calling plan	N	A
q.	Completes a 911 call	Y	D
r.	Completes 0+ call billed via the LEC	Y	D
s.	Completes 0+ call not billed via the LEC	Y	D
t.	Completes Relay Call via 711 billed via the LEC	Y	E
u.	Completes Relay Call via 711 not billed via the LEC	Y	E
v.	Completes Relay Call via toll-free access billed via the LEC	Y	E
w.	Completes Relay Call via toll-free access not billed via the LEC	Y	D
x.	Completes DA Call – service provided and billed by the LEC	Y	D
y.	Completes DA Call – service not provided by the LEC but billed via the LEC	Y	D
z.	Completes DA Call – service not provided by the LEC and not billed via the LEC	Y	E
aa.	No LPIC/No PIC	Y	F
ab.	No LPIC/No PIC and Local Toll Call completed by dial around code, billed by LEC.	Y	D
ac.	No LPIC/No PIC and Local Toll Call completed by dial around code, not billed by LEC.	Y	D
ad.	No LPIC/No PIC and LD Toll Call completed by dial around code, billed by LEC.	Y	D
ae.	No LPIC/No PIC and LD Toll Call completed by dial around code, not billed by LEC.	Y	D
af.	No LPIC/With PIC	N	A
ag.	No LPIC/With PIC – LD calls billed by LEC	N	G
ah.	No LPIC/With PIC – LD calls not billed by LEC	N	G
ai.	No LPIC/with PIC and Local Toll Call completed by dial around code, billed by LEC.	N	G
aj.	No LPIC/with PIC and Local Toll Call completed by dial around code, not billed by LEC.	N	G
ak.	No LPIC/with PIC and LD Toll Call completed by dial around code, billed by LEC.	N	G
al.	No LPIC/With PIC and LD Toll Call completed by dial around code, not billed by LEC.	N	G
Am.	With LPIC/No PIC and Local Toll Call completed by dial around code, billed by LEC.	N	G

No.	Feature	SQR Eligible	Rationale Label
an.	With LPIC/No PIC and Local Toll Call completed by dial around code, not billed by LEC.	N	G
ao.	With LPIC/No PIC and LD Toll Call completed by dial around code, billed by LEC.	N	G
ap.	With LPIC/No PIC and LD Toll Call completed by dial around code, not billed by LEC.	N	G
aq.	With LPIC/With PIC	N	A
ar.	With LPIC/With PIC and Local Toll Call completed by dial around code, billed by LEC.	N	G
as.	With LPIC/With PIC and Local Toll Call completed by dial around code, not billed by LEC.	N	G
at.	With LPIC/With PIC and LD Toll Call completed by dial around code, billed by LEC.	N	G
au.	With LPIC/With PIC and LD Toll Call completed by dial around code, not billed by LEC.	N	G
av.	With LPIC/With PIC – all toll calls billed via LEC	N	G
Aw.	With LPIC/With PIC – all toll calls not billed via LEC	N	G
ax.	Collect Call billed via the LEC	Y	D
ay.	Collect Call not billed via the LEC	Y	D
az.	900 Service Calls billed via the LEC	Y	D
ba.	PIC and LPIC to an IXC other than Verizon/Verizon affiliate	N	A

3. Please provide Verizon's legal and/or policy rationale for why each example in the table above is or is not SQR eligible. Assuming some of the examples may have the same rationale, please list the various rationales as a response to this question, assign each rationale a label, and identify the rationale label in the column titled "Rationale Label" in the above table.

Response: Verizon's legal and policy rationales listed below are based on the definitions of "basic local telecommunications service" and "nonbasic service" in Section 364.02, Florida Statutes, and the Commission's interpretation of those definitions in Docket No. 094761.

Rationale Labels Used in Table Provided in Response to Data Request No. 2

- A. The added service is unregulated.
- B. The added service is nonbasic.
- C. The added service is unregulated, but transitory, and for purposes of the SQRs, Verizon would treat the customer's line as basic.
- D. The added service is nonbasic, but transitory, and for purposes of the SQRs, Verizon would treat the customer's line as basic.
- E. The added service is nonbasic, but transitory and offered free of charge, and for purposes of the SQRs, Verizon would treat the customer's line as basic.

F. The service meets the definition of “basic local telecommunications service” under Section 364.02(1), Florida Statutes.

G. The scenario identifies a PIC or LPIC (or both), which means the customer has added a nonbasic service.

4. Please add any combination of dial tone service, along with a feature or specific action that is not listed that Verizon believes should be listed in the table.

Response: N/A

5. If a Verizon customer is not eligible for the SQRs due to some combination(s) of dial tone services and feature(s), and the service is changed to a status that qualifies for the SQRs, will Verizon automatically qualify the customer for SQR eligibility?

Response: Yes.

6. Does a Verizon customer stay nonbasic if there is a one time use of a non-SQR eligible feature or service?

Response: No. A basic customer that uses a non-SQR eligible feature or service on a one-time basis would remain a basic customer.

7. Please estimate the number of residential customers that will be covered by the SQRs based on Verizon’s interpretation of the definition of Basic Local Telecommunications Service in Section 364.02, F.S.

Response: Confidential (X).

8. How many residential customers will or would be covered by the SQRs if Verizon concludes that residential customers with a PIC/LPIC are SQR eligible?

Response: The Commission has determined in Docket No. 0904761 that such customers are not SQR eligible and Verizon will provide SQR reporting consistent with that decision. Verizon will respond further once it has obtained the customer count Staff has requested.

STATE OF FLORIDA

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Public Service Commission

ACKNOWLEDGEMENT

DATE: February 12, 2010

TO: David Christian, Verizon

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 090550 or, if filed in an undocketed matter, concerning response to staff's 2/8/10 data request, and filed on behalf of Verizon. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.

DOCUMENT NUMBER 090550
00980 FEB 12 2010
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