

April 14, 2011

COMMISSION  
CLERK

**IMPORTANT NOTICE REGARDING COMPLIANCE & REPORTING**

Victor Cordiano  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

110000-07

**Re: Metropolitan Telecommunications of Florida, Inc. (MetTel)  
Florida 2011 Local Competition Data Request  
For the Year Ended December 31, 2010**

To Whom It May Concern:

Enclosed please find the Florida 2011 Local Competition Data Request for the year ended December 31, 2010, filed on behalf of Metropolitan Telecommunications of Florida, Inc. (MetTel).

A copy of the Confidential Report has been marked as Confidential. MetTel is requesting confidential treatment of the areas that are highlighted in yellow. MetTel further requests Confidential treatment of the yellow highlighted portions of the enclosed Confidential FCC 477. These forms have been placed in a sealed envelope marked "CONFIDENTIAL"

In addition to the Confidential Reports, MetTel has enclosed two copies of the Public Report on which the portions considered Confidential have been blackened out, and two copies of the FCC 477 on which the portions that are considered Confidential have been blackened out.

Please contact Meghan Ruwet at (303) 663-0102 or [mtr@compliancegroup.com](mailto:mtr@compliancegroup.com) with any questions concerning this filing. Thank you for your assistance in this matter.

Sincerely,

Meghan Ruwet  
The Compliance Group  
Consultant  
Telephone: (303) 663-0102  
Email: [mtr@compliancegroup.com](mailto:mtr@compliancegroup.com)

- claim of confidentiality
- notice of intent
- request for confidentiality
- filed by OPC

For DN 02657-11, which is in locked storage. You must be authorized to view this DN.-CLK

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**AFFIDAVIT**  
**REQUESTING CONFIDENTIAL TREATMENT OF FINANCIAL INFORMATION**

1. Metropolitan Telecommunications of Florida, Inc. ("MetTel"), through their attorney, hereby requests the Florida Public Service Commission ("Commission") afford confidential treatment of the financial information submitted with its 2011 Local Competition Data Request.

2. In support of said request, the following information is provided.

3. The access line information submitted with its 2011 Local Competition Data Request contains commercially sensitive information regarding the company's operations. The disclosure of this information in the context of the above-captioned docket or otherwise could provide MetTel's competitors with valuable insight into the company's financial structure and planned operations. Because this represents highly confidential and strictly proprietary information, the disclosure of which to the public, including competitors, could result in direct and immediate harm to the competitive position of MetTel, there is a genuine need to seek non-disclosure of this information.

4. While the Commission needs to review this information, the general public has no direct or substantive interest in this information.

5. MetTel's competitors also do not require this information other than to gain potential competitive advantage or to use the information in an unfair and potentially anti-competitive manner.

6. The enduring policies of the state have been to encourage and support competition in telecommunications. Essential to the proper workings of that policy is the

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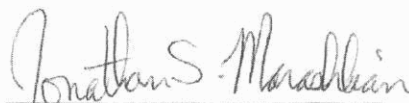
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maintenance of a level playing field in which competitors are made to compete on their own merits relative to price, service quality, innovation and customer service. Allowing access to one competitor's commercially sensitive information runs contrary to these principles and, hence, would not serve the public interest.

7. The information sought to be protected has not been made public in any other forum or jurisdiction.

8. Accordingly, MetTel respectfully request the Commission afford confidential treatment of the financial information submitted with its 2010 Local Competition Data Request.

Respectfully submitted,



Jonathan S. Marashlian  
HELEIN & MARASHLIAN, LLC  
The *Comm*Law Group  
1420 Spring Hill Road, Suite 205  
McLean, Virginia 22102  
(703) 714-1300 (Tel)  
(703) 714-1330 (Fax)  
jsm@commlawgroup.com (Email)

Sworn and subscribed this \_\_\_\_ day of 13<sup>th</sup> day of April 2011.

Form 477 Submission for FRN: 9806019, Company: Metropolitan Telecommunications Holding Company, State: FL, Operations: Non-ILEC, Data as of Dec 31, 2010

Status: On Feb 22, 2011, the status for this Form 477 submission was changed to Original - Submitted.

All filers must complete Items 1 through 11 below

Data Description	Value
Data as of	Dec 31, 2010
1. FRN	9806019
2. Company	Metropolitan Telecommunications Holding Company
3. Type of Operations	<input type="radio"/> ILEC <input checked="" type="radio"/> 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. Select "not shown" if no appropriate name appears in the list.	Metropolitan Telecommunications Holding Company
If you selected "not shown" above, type in the single name that will identify all commonly-owned or commonly-controlled filers.	
5. State	FL
6. Contact person (person who prepared the submitted data)	Meghan Ruwet
7. Contact person telephone number and email address	Phone. 303-663-0102
	Email. mtr@compliancegroup.com
8. Status of submission	Original - Submitted
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 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).	Ralph Dichy
11. Certifying official telephone number and email address	Phone. 212-607-6323
	Email. rdichy@mettel.net








Part II.A: Local Exchange Telephone Service

REDACTED

	(1)	(2)	(3)	(4)
	Voice-grade equivalent lines and voice-grade equivalent wireless channels in service to your end user customers	Voice-grade equivalent lines you provided to unaffiliated communications carriers under resale arrangements including, among others, commercial agreements that replaced UNE-P and resold services such as local exchange, Centrex, and channelized special access	Lines you provided to unaffiliated communications carriers under any UNE loop arrangement where you did not also provide UNE switching for the line. (Do not convert UNEs to voice-grade equivalents.)	Lines you provided to unaffiliated communications carriers as UNE-P. (Do not convert UNEs to voice-grade equivalents.)
(a) Total number. See instructions on what to include.				
(b) Percentage of (a) that are residential lines				
(c) Percentage of (a) for which you (including affiliates) are the presubscribed interstate long distance carrier				
(d) Percentage of (a) used for residential service AND for which you (including affiliates)				

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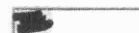










are the presubscribed interstate long distance carrier

- (e) **Percentage** of (a) provided over your own (including affiliates) local loop facilities or the equivalent 
- (f) **Percentage** of (a) provided over UNE loops obtained from an unaffiliated carrier without also obtaining that carrier's UNE switching for that line 
- (g) **Percentage** of (a) provided over UNE-Platform (but treat commercial agreements that replaced UNE-P as "provided by reselling," below) 
- (h) **Percentage** of (a) provided by reselling unaffiliated-carrier services including, among others, commercial agreements that replaced UNE-P and resold services such as local exchange, Centrex, and channelized special access 
- (i) **Percentage** of (a) provided over optical fiber at the end user premises 
- (j) **Percentage** of (a) provided over coaxial cable at the end user premises 
- (k) **Percentage** of (a) provided over fixed wireless at the end user premises 

**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) <b>Total number.</b> See instructions on what to include.			
(b) <b>Percentage</b> of (a) provided under residential grade service plans			
(c) <b>Percentage</b> of (a) purchased under terms that allow use with any broadband connection ("nomadic" functionality)			
(d) <b>Percentage</b> of (a) provided in conjunction with a copper wire-based broadband connection (DSL or Other Wireline)			
(e) <b>Percentage</b> of (a) provided in conjunction with a fiber-to-the-end user broadband connection			
(f) <b>Percentage</b> of (a) provided in conjunction with a Cable Modem broadband connection			
(g) <b>Percentage</b> of (a) provided in conjunction with a fixed wireless broadband connection			
(h) <b>Percentage</b> of (a) provided in conjunction with any other type of broadband connection			

**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:

[Redacted ZIP codes]

Errors / Warnings  
No Errors or Warnings found.

**Table 1: Traditional Retail Switched Access Lines on a Voice-Grade Equivalent (VGE) Basis**

**REDACTED**

Company Name: Metropolitan Telecommunications of Florida, Inc. (MetTel)

Company Code\*: TX408

Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE TRADITIONAL RETAIL SWITCHED ACCESS LINES. DO NOT INCLUDE LINES REPORTED IN TABLE 5.**

Complete Table 1 if you provided voice telephone service to Florida end users via one or more voice-grade equivalent (VGE) lines or fixed wireless VGE channels. See FCC Form 477 definitions and instructions for Line A.// and complete this table accordingly.

Each NPA-NXX and corresponding data must be entered in a separate row. Please combine lines that have the same NPA-NXX.

Do not report special access lines or any high-capacity connections between two locations of the same end user, ISP, or telecommunications carrier.

Please include a grand total row in the last row of data. Each cell in the table must be populated. If you have no lines for an exchange in any of the various line types, you must enter a zero. Numbers should be formatted as percentages.

Please report all UNE-P lines in column G including those governed by commercial agreements.

Please provide data as of December 31, 2010.

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(1)	(a)	Percentages of lines and wireless channels reported in (a)**											
		(b)	(e)		(f)		(g)		(h)		(i)		(j)
NPA-NXX i.e.(850-413)	Total VGE lines and VGE wireless channels in service	Residential lines	Provided over your own local loop facilities or the fixed wireless last-mile equivalent		Provided over UNE loops obtained without UNE switching		Provided over UNE-Platform		Provided by reselling another carrier's service (including Centrex/Centron or channelized special access service)		Provided over optical fiber facilities used in the part of the line that connects to the end user premises		Provided over coaxial cable at the end user premises ("cable telephony")
Total lines and channels you provided to end users:			Res	Bus	Res	Bus	Res	Bus	Res	Bus	Res	Bus	Res

\* \*We are not asking for information contained in colu

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**Table 2: Resold Lines Provided to Unaffiliated Telecommunications Carriers on a Voice-Grade Equivalent (VGE) Basis**

**Company Name:**

Metropolitan Telecommunications of Florida, INC. (MetTel)

**Company Code\*:**

TX408

Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE RESOLD LINES PROVIDED TO UNAFFILIATED TELECOMMUNICATIONS CARRIERS.**

Complete Table 2 if you provided one or more *voice-grade equivalent (VGE)* lines or fixed wireless *VGE* channels to *unaffiliated* telecommunications carriers, including those under *commercial* agreements, to enable the *unaffiliated* carriers to provide *voice telephone service* to Florida end users. See FCC Form 477 definitions and instructions for *Line B.II-2* and *Line B.II-3* and complete this table accordingly, except that you should *not* report any UNE-Ps in this table.

Each **NPA-NXX** and corresponding data must be entered in a separate row.  
Please combine lines that have the same **NPA-NXX**.

Report all lines and channels under *resale* arrangements with *unaffiliated* carriers, including *other resale* arrangements under *commercial* agreements that replace, or substitute for, UNE arrangements or line-sharing. However, do *not* report any Local Platform (formerly known as UNE-P) loops in this table, as those should be reported in Table 4. Examples of *other resale* arrangements also include *Centrex/Centron* or *Special Access* service to enable the *unaffiliated* carriers to provide *local* telephone service to their end users. However, do *not* report special access lines or any high-capacity connections *between two locations of the same* end user, ISP or telecommunications carrier.

**Please provide data as of December 31, 2010.**

	(1) <b>NPA-NXX</b> i.e.(850-413)	(2) Res or Bus	(a) Total VGE lines and VGE wireless channels in service
II.B. Voice telephone service that you provided to unaffiliated telecommunications carriers, categorized by:			
Lines and channels under <i>Resale</i> arrangements			



**Table 3: UNE Loops Without Switching Provided to Unaffiliated Telecommunications Carriers - Not on VGE Basis**

**Company Name:**

Metropolitan Telecommunications of Florida, Inc. (MetTel)

**Company Code\*:**

TX408

Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE UNE LOOPS WITHOUT SWITCHING PROVIDED TO UNAFFILIATED TELECOMMUNICATIONS CARRIERS.**

Complete Table 3 if you provided circuits to *unaffiliated* telecommunications carriers under an *unbundled network element (UNE) loop* arrangement, including those under *commercial* agreements, to enable the *unaffiliated* carrier to provide *voice telephone service* to Florida end users. See FCC Form 477 definitions and instructions for *Line C.II-4* and complete this table accordingly.

Each NPA-NXX and corresponding data must be entered in a separate row.

Please combine lines that have the same NPA-NXX.

Please provide data as of December 31, 2010.

	(1) NPA-NXX i.e.(850-413)	(2) Res or Bus	(a) Total lines and wireless channels (do <i>not</i> convert to VGEs)
I.C. UNE Loops that you provided to <i>unaffiliated</i> telecommunications carriers, categorized by:			
Lines and channels under a UNE loop arrangement, where you <i>did not provide switching</i> for the line.			

**Table 4: UNE Loops With Switching (formerly known as UNE-P) Provided to Unaffiliated Telecommunications Carriers - Not on VGE Basis**

**Company Name:** Metropolitan Telecommunications of MetTel, Inc. (MetTel)

**Company Code\*:** TX408

\* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE UNE LOOPS WITH SWITCHING PROVIDED TO UNAFFILIATED TELECOMMUNICATIONS CARRIERS.**

Complete Table 4 if you provided circuits to *unaffiliated* telecommunications carriers under a *Local Platform* (formerly known as *UNE-P*) arrangement, including those under *commercial* agreements, to enable the *unaffiliated* carriers to provide *voice telephone service* to Florida end users. See FCC Form 477 definitions and instructions for *Line C.II-5* and complete this table accordingly, except that you should include the UNE-Ps governed by *commercial* agreements in this table, not in Table 2.

Each NPA-NXX and corresponding data must be entered in a separate row.  
Please combine lines that have the same NPA-NXX.

Please provide data as of December 31, 2010.

	(1) NPA-NXX i.e.(850-413)	(2) Res or Bus	(a) Total lines and wireless channels (do <i>not</i> convert to VGEs)
II.C. UNE Loops that you provided to <i>unaffiliated</i> telecommunications carriers, categorized by: Lines and channels under a UNE loop arrangement, where you also <i>provided switching</i> for the line (" <i>Local Platform</i> ", formerly <i>UNE-P</i> ").			



State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

Meghan Ruwet  
1420 Spring Hill Road  
Suite 205  
McLean, VA 22102

**Re: Acknowledgement of Confidential Filing in Docket No. 110000-OT**

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a **CONFIDENTIAL DOCUMENT** filed on April 19, 2011, in the above-referenced docket.

Document Number 02657-11 has been assigned to this filing, which 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.