

2012 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by April 15, 2012)<sup>1</sup>

Legal Company Name: DIECA Communications, Inc.

D/B/A: Covad Communications Company

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

Contact name & title: Katherine K. Mudge, Director State Affairs/ILEC Relations

Telephone number: 512-794-6197

E-mail address: katherine.mudge@megapath.com

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

Services Provided in Florida

1. Do you currently serve local telephone subscribers in Florida? Please check yes or no.

Residential Business
Yes Yes
X No X No

2. Please complete all applicable data tables.

3. If you submitted data tables in 2011, please provide an explanation below of any differences in the number of access lines by category that occur in your 2012 submission that exceed 10 percent.

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

Response: [Redacted]

- 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)

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

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5. What services, other than local service, does your company currently provide 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

6. This question concerns prepaid local telephone service in Florida. Please place a check by the response that most accurately reflects whether or not you provide prepaid local telephone service.

Company provides ONLY prepaid local telephone service in Florida  
 Company provides prepaid AND non-prepaid local telephone service in Florida  
 Company does NOT provide prepaid local telephone service in Florida

**Bundled Services**

7. 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**

8. Indicate below whether you are currently providing VoIP service to end users in Florida. VoIP service is defined as IP-based voice service over a digital connection. Please check all that apply.

Not providing VoIP service to end users  
 Providing VoIP services to business end users  
 Providing VoIP services to residential end users

9. If you are providing VoIP service in Florida, please check all that apply:

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

**Broadband**

10. Do you offer broadband to residential customers in Florida?

- Yes
- No

11. 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:** [REDACTED]

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

**Response:** [REDACTED]

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

**Response:** [REDACTED]

14. What are the typical downstream and upstream speeds for your most subscribed to broadband service?

**Response:** Covad offers several broadband services. The descriptions of Covad's broadband services and their download and upload speeds may be found at <http://www.megapath.com>.

15. What is the monthly price for your most subscribed to 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 vary depending upon location and other variables.

**Fiber Deployment**

16. Did you deploy fiber to homes or businesses in Florida between January 1, 2011 and

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December 31, 2011?

Yes  
 No

17. 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.

Residential Subscribers  
 Business Subscribers  
 Total

18. 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.

Residential Subscribers  
 Business Subscribers  
 Total

**Miscellaneous**

19. In calendar year 2011, 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.  \$0
2.  \$1 - \$249,999
3.  \$250,000 - \$999,999
4.  \$1,000,000 - \$9,999,999
5.  \$10,000,000 or more

20. Are you currently operating under Chapter 7 or Chapter 11 bankruptcy protection? Please check yes or no.

Yes  
 No

21. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2011**.

**Response:** See Attached.

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Comments

22. 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 and 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 facilities. In addition, Covad submits that barriers to entry apply to the small and medium-sized 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.