

THE
COMPLIANCE
GROUP

REDACTED

March 19, 2014

IMPORTANT NOTICE REGARDING COMPLIANCE & REPORTING

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

RECEIVED-FPSC
14 APR -3 AM 10:28
COMMISSION
CLERK

**Re: Metropolitan Telecommunications of Florida, Inc. (MetTel)
Florida 2013 Local Competition Data Request
For the Year Ended December 31, 2013**

To Whom It May Concern:

Enclosed please find the Florida 2014 Local Competition Data Request for the year ended December 31, 2013, 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. 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.

Please contact Meghan Ruwet at (303) 663-0102 or 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

GENERAL INQUIRIES: 1-877-435-3481
FAX: 978-709-8077
EMAIL: MAIL@COMPLIANCEGROUP.COM
WEB: WWW.COMPLIANCEGROUP.COM

THE COMPLIANCE GROUP
1420 SPRING HILL ROAD
SUITE 205
MCLEAN, VIRGINIA 22102

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 2014 Local Competition Data Request.

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

3. The access line information submitted with its 2014 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

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 2014 Local Competition Data Request.

Respectfully submitted,



Ralph Dichy
Metropolitan Telecommunications of Florida, Inc. (MetTel)
55 Water Street, 32nd Floor
New York, New York 10041
(212) 607-6323 (Tel)
(212) 635-6074 (Fax)
rdichy@mettel.net (Email)

Sworn and subscribed this 24th day of ~~day~~ of March 2014.



2014 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by April 15, 2014)¹

Legal Company Name: Metropolitan Telecommunications of Florida, Inc.

D/B/A: MetTel

FPSC Company Code (e.g., TX000) TX-408

Contact name & title: Meghan Ruwet, Consultant

Telephone number: (303) 663-0102

E-mail address: mtr@compliancigroup.com

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

1. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2013**.
Please see enclosed.

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

Yes
 No

3. What services, other than local service, does your company currently provide in Florida? Please check all that apply.

<input checked="" 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 checked="" type="checkbox"/> Interexchange service	<input type="checkbox"/> Satellite television
<input checked="" type="checkbox"/> Cellular/wireless service	<input checked="" type="checkbox"/> Broadband Internet access

4. 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

5. 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.

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.

Form 477 Submission for FRN: 9806019, Company: Metropolitan Telecommunications Holding Company, State: FL, Operations: Non-ILEC, Data as of Dec 31, 2013

Status: On Jan 20, 2014, 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, 2013
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: regulatory@compliancegroup.com
	Confirm Email: regulatory@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

	(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.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(b) Percentage of (a) that are residential lines	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(c) Percentage of (a) for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(d) Percentage of (a) used	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

for residential service AND for which you (including affiliates) 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.

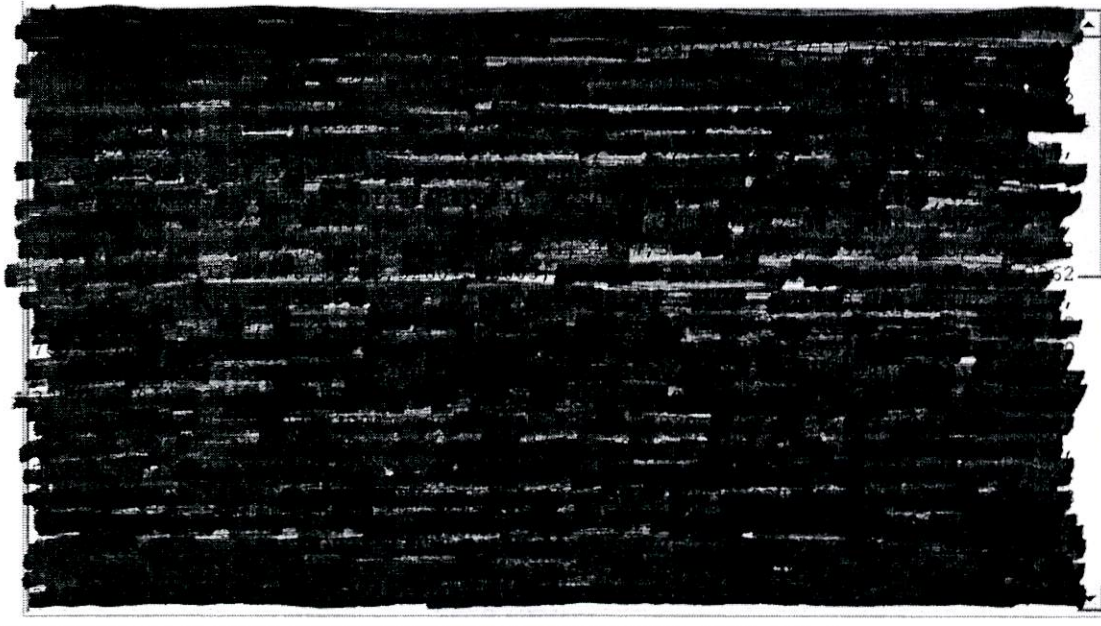
Reporting by State: Subscriptions reported in (1) must be reported in the state of the subscriber's "Registered Location" as of the data-collection date. (This is the most recent information obtained by an interconnected VoIP service provider that identifies the physical location of the end user. See 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) 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]	

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:



Errors / Warnings

No Errors or Warnings found.

Form 477 Submission for FRN: 9806019, Company: Metropolitan Telecommunications Holding Company, State: FL, Operations: Non-ILEC, Data as of Dec 31, 2013

Status: On Jan 20, 2014, the status for this Form 477 submission was changed to Original - Submitted.

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Data as of	Dec 31, 2013
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: regulatory@compliancegroup.com
	Confirm Email: regulatory@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

	(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.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(b) Percentage of (a) that are residential lines	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(c) Percentage of (a) for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(d) Percentage of (a) used	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

for residential service AND for which you (including affiliates) 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

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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.

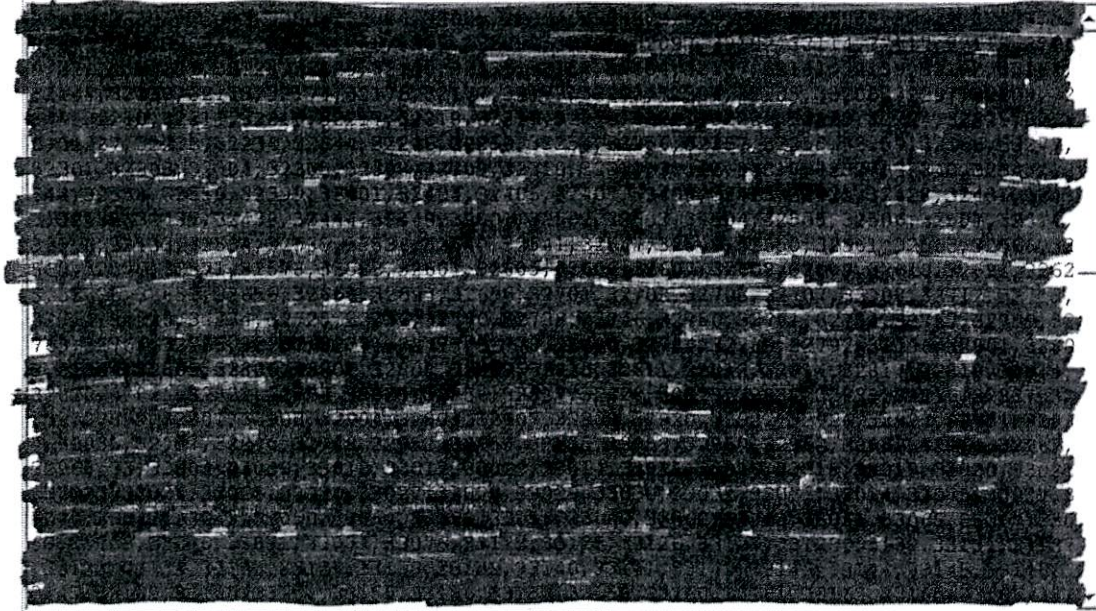
Reporting by State: Subscriptions reported in (1) must be reported in the state of the subscriber's "Registered Location" as of the data-collection date. (This is the most recent information obtained by an interconnected VoIP service provider that identifies the physical location of the end user. See 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]	

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.

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Errors / Warnings

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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: regulatory@compliancegroup.com
	Confirm Email: regulatory@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

	(1)	(2)	(3)	(4)
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(b) Percentage of (a) that are residential lines	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(c) Percentage of (a) for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(d) Percentage of (a) used	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

for residential service AND for which you (including affiliates) are the presubscribed interstate long distance carrier

(e) Percentage of (a) provided over your own (including affiliates) local loop facilities or the equivalent

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Part II.B: Interconnected VoIP Service

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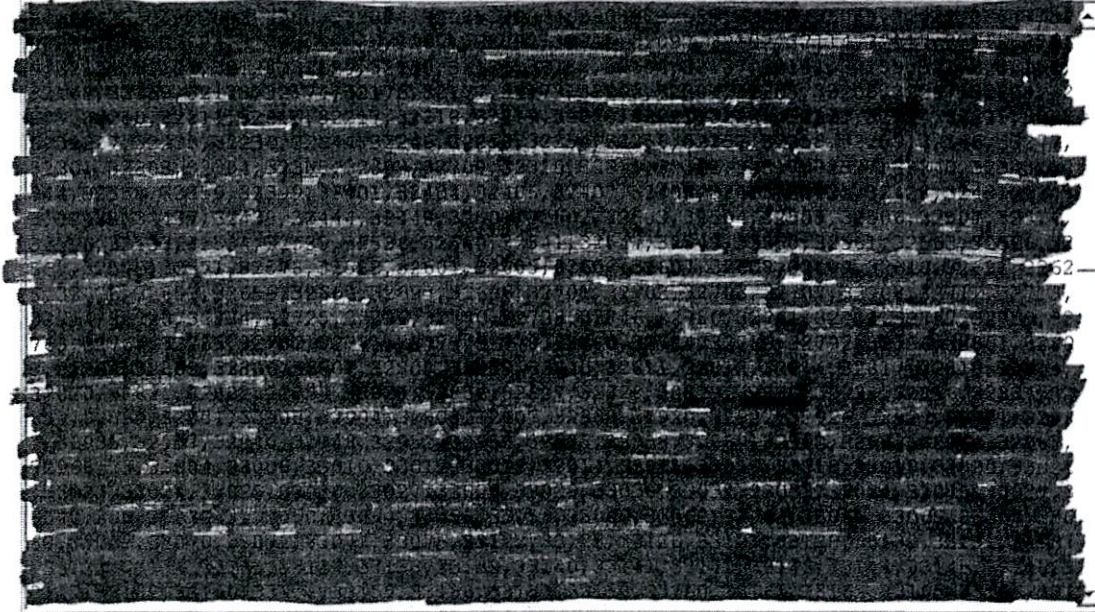
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(a) Total number. See instructions on what to include.	[REDACTED]	[REDACTED]	[REDACTED]
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(c) Percentage of (a) purchased under terms that allow use with any broadband connection ("nomadic" functionality)	[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]	

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

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Errors / Warnings

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