

REDACTED

March 18, 2015

IMPORTANT NOTICE REGARDING COMPLIANCE & REPORTING

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

15 MAR 23 PM 7:53
OFFICE OF
TELECOMMUNICATIONS

**Re: Metropolitan Telecommunications of Florida, Inc. (MetTel)
Florida 2015 Local Competition Data Request
For the Year Ended December 31, 2014**

To Whom It May Concern:

Enclosed please find the Florida 2015 Local Competition Data Request for the year ended December 31, 2014, 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

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
TEL *Redacted* _____
CLK _____

RECEIVED-FPSC
15 MAR 23 AM 10:04
COMMISSION
CLERK

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 2015 Local Competition Data Request.

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

3. The access line information submitted with its 2015 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 2015 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 18th day of March of March 2015.



Form 477 - Local Telephone Competition and Broadband Reporting

SECURITY
NOFORN

- [Form 477 Instructions](#)

Submission Menu

[Help](#) | OMB No. 3060-0816

FRN: 0009806019

Metropolitan Telecommunications Holding Company

Operations: Non-ILEC Data as of: Dec 31, 2014

Submission Status

Original - Submitted

Last Updated: Feb 16, 2015 11:11:36

Local Exchange Telephone Subscription

For each state in which you have one or more customers,

1. allocate lines provided to other providers between Wholesale and UNE-L;
2. allocate lines provided to end users by (a) Services Sold, (b) Product Type, (c) Ownership and (d) Last-mile Medium; and
3. click Save Current State, then go to the next state using the menu at the left or click Finished ».

For more information about how to allocate your lines, click [here](#). Every cell must contain a number. Blanks will cause an error. Save your work as you go and when you've entered data for each state, click Finished ».

Each cell must contain a number, even if it's zero!

Subscriptions Listed By
State

[Alabama](#)

[Arizona](#)

[Arkansas](#)

[California](#)

[Colorado](#)

[Connecticut](#)

[Delaware](#)

[District of
Columbia](#)

[Florida](#)

- Georgia
- Hawaii
- Idaho
- Illinois
- Indiana
- Iowa
- Kansas
- Kentucky

Florida

* All fields are required

Lines provided to Unaffiliated Providers

1 Wholesale: [redacted] UNE-L: [redacted]

Lines provided to End Users...

by Services Sold

1 Total: [redacted] Voice with Internet: [redacted] Voice without Internet: [redacted]

2. [redacted] 3. [redacted]

by Product Type

1. Total: [redacted] 2. Consumer Total: [redacted] Business /Gov. Total: [redacted]

3. Consumer & No PIC: [redacted]

Consumer & PIC: [redacted] Business/Gov. & No PIC: [redacted]

Business/Gov. & PIC: [redacted]

by Ownership

1. Total: [redacted] 2. Owned: [redacted] 3. UNE-L: [redacted] 4. Resale: [redacted]

by Last-mile Medium

1. Total: [REDACTED] 2. FTTP: [REDACTED] Coaxial Cable: [REDACTED] Fixed Wireless: [REDACTED] 3. [REDACTED] 4. [REDACTED] 5. Copper: [REDACTED]



Cancel

Next State

Continue »

For help or assistance please contact us at 1-877-480-3201 or 1-717-338-2824 (TTY) or you may submit requests online via [e-support](#).

- [Federal Communications Commission](#)
- [445 12th Street SW](#)
- [Washington, DC 20554](#)
- [Phone: 1-888-225-5322](#)
- [TTY: 1-888-835-6322](#)
- [Fax: 1-866-418-0232](#)
- [E-mail: \[icoinfo@fcc.gov\]\(mailto:icoinfo@fcc.gov\)](#)
- [RSS](#)
- [Privacy Policy](#)
- [Moderation Policy](#)
- [Website Policies & Notices](#)
- [Required Browser & Plugins](#)
- [FOIA](#)
- [No Fear Act Data](#)
- [Open Government Directive](#)
- [Plain Writing Act](#)
- [2009 Recovery and Reinvestment Act](#)

	Federal Communications Commission	Form 477 - Local Telephone Competition and Broadband Reporting	
Submission Menu			
<ul style="list-style-type: none">Form 477 Instructions			
			Help OMB No. 3080-0816
FRN: 0009805019			
Metropolitan Telecommunications Holding Company			
Operations: Non-ILEC Data as of: Dec 31, 2014			
			Submission Status Original - Submitted Last Updated: Feb 16, 2015 11:11:36
Local Exchange Telephone Subscription			
For each state in which you have one or more customers,			
<ol style="list-style-type: none">allocate lines provided to other providers between Wholesale and UNE-L;allocate lines provided to end users by (a) Services Sold, (b) Product Type, (c) Ownership and (d) Last-mile Medium; andclick Save Current State, then go to the next state using the menu at the left or click Finished »			
For more information about how to allocate your lines, click here . Every cell must contain a number. Blanks will cause an error. Save your work as you go and when you've entered data for each state, click Finished »			
⚠ Each cell must contain a number, even if it's zero!			
Subscriptions Listed By State			
Alabama			
Arizona			
Arkansas			
California			
Colorado			
Connecticut			
Delaware			
District of Columbia			
Florida			

Georgia

Hawaii

Idaho

Illinois

Indiana

Iowa

Kansas

Kentucky

Florida

* All fields are required

Lines provided to Unaffiliated Providers

1 Wholesale: [redacted] UNE-L: [redacted]

Lines provided to End Users...

by Services Sold

1 Total: [redacted] Voice with Internet: 2 [redacted] Voice without Internet: 3 [redacted]

by Product Type

1. Total: [redacted] 2. Consumer Total [redacted] Business /Gov. Total [redacted] 3. Consumer & No PIC: [redacted] Consumer & PIC: [redacted] Business/Gov. & No PIC: [redacted] Business/Gov. & PIC: [redacted]

by Ownership

1. Total: [redacted] 2. Owned: [redacted] 3. UNE-L: [redacted] 4. Resale: [redacted]

by Last-mile Medium

1 Total: [REDACTED] 2 FTTP: [REDACTED] Coaxial Cable: [REDACTED] Fixed Wireless: [REDACTED] 5 Copper: [REDACTED]
3 [REDACTED] 4 [REDACTED]

Cancel

Next State

Continue >

For help or assistance please contact us at 1-877-480-3201 or 1-717-338-2824 (TTY) or you may submit requests online via [eSupport](#).

- [Federal Communications Commission](#)
- [445 12th Street SW](#)
- [Washington, DC 20554](#)
- [Phone: 1-888-225-5322](#)
- [TTY: 1-888-835-6322](#)
- [Fax: 1-888-418-0232](#)
- [E-mail: \[foia@fcc.gov\]\(mailto:foia@fcc.gov\)](#)
- [RSS](#)
- [Privacy Policy](#)
- [Moderation Policy](#)
- [Website Policies & Notices](#)
- [Recycled, Recycled & Recycled](#)
- [FOIA](#)
- [No Fear Act Data](#)
- [Open Government Directive](#)
- [Plain Writing Act](#)
- [2009 Recovery and Reinvestment Act](#)



Form 477 - Local Telephone Competition and Broadband Reporting

- [Form 477 Instructions](#)

[Submission Menu](#)

[Help](#) | OMB No. 3060-0816

FRN: 0009806019

Metropolitan Telecommunications Holding Company

Operations: Non-ILEC Data as of: Dec 31, 2014

Submission Status

Original - Submitted

Last Updated: Feb 16, 2015 11:14:19

Interconnected VoIP Subscriptions

For each state in which you have one or more iVoIP subscribers,

1. allocate over-the-top iVoIP subscriptions, where you provide service to end users without also supplying last-mile facilities, between Consumer and Business / Government subscribers.
2. allocate all other iVoIP subscriptions, where you provide service to end users and also supply last-mile facilities, by (a) End User Type, (b) Services Sold, and (c) Last-mile Medium; and
3. click Save Current State, then go to the next state using the menu at the left or click Finished ».

For more information about how to allocate your lines, click [here](#).

⚠ Each cell must contain a number, even if it's zero! Blanks will cause an error.

Save your work as you go, and when you've entered data for each state, click Finished »

Subscriptions by State

[Alabama](#)

[Arizona](#)

[Arkansas](#)

[California](#)

[Colorado](#)

[Connecticut](#)

[Delaware](#)

[District of](#)

[Columbia](#)

Florida

Georgia

Hawaii

Idaho

Illinois

Indiana

Iowa

Kansas

Kentucky

Florida

* All fields are required

Grand Totals, by End-user Type

1. Total: [REDACTED] 2. Consumer: [REDACTED] 3. Business / Gov.: [REDACTED]

Over-the-top Subscriptions

Service to End Users Provided Without also Supplying Last-mile Facilities

1. Total: [REDACTED] 2. Consumer: [REDACTED] 3. Business / Gov.: [REDACTED]

All Other Subscriptions

**Service to End Users Provided over Last-mile Facilities Supplied by the Provider...
by End-user Type**

1. Total: [REDACTED] 2. Consumer: [REDACTED] 3. Business / Gov.: [REDACTED]

by Services Sold

1. Total: [REDACTED] 2. Voice with Internet: [REDACTED] 3. Voice without Internet: [REDACTED]

by Last-mile Medium

1. [Redacted] 2. [Redacted] 3. [Redacted] 4. [Redacted] 5. [Redacted]
Total: [Redacted] FTTP: [Redacted] Coaxial Cable: [Redacted] Fixed Wireless & Satellite: [Redacted] Copper: [Redacted]

Cancel

Next State

Finished >

For help or assistance please contact us at 1-877-480-3201 or 1-717-338-2824 (TTY) or you may submit requests online via [e-support](#).

- [Federal Communications Commission](#)
- [445 12th Street SW](#)
- [Washington, DC 20554](#)
- [Phone: 1-888-225-5322](#)
- [TTY: 1-888-835-4322](#)
- [Fax: 1-866-418-0232](#)
- [E-mail: \[foia@fcc.gov\]\(mailto:foia@fcc.gov\)](#)
- [BSS](#)
- [Privacy Policy](#)
- [Moderation Policy](#)
- [Website Policies & Notices](#)
- [Remove Browser & Plugins](#)
- [FOIA](#)
- [No Fear Act Data](#)
- [Open Government Directive](#)
- [Plain Writing Act](#)
- [2009 Recovery and Reinvestment Act](#)
- [Ad](#)

2015 Competitive Local Exchange Carrier (CLEC) Questionnaire

(Due by April 15, 2015)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@compliancegroup.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, 2014**.
Please see enclosed.

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

 Yes

 X No

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

 Private line/special access

 X VoIP

 Wholesale transport

 Interexchange service

 X Cellular/wireless service

 Wholesale loops

 Fiber or copper based video service

 Cable television

 Satellite television

 X 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

 X 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.