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May 21, 2015

HAND DELIVERY

Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

Re: Docket NO. 150000-OT - Undocketed Filings for 2015

Dear Ms. Stauffer:

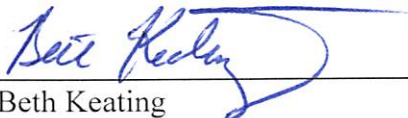
Enclosed for filing, please find the response of tw telecom of florida, l.p. ("TWTC") to the Commission's 2015 Competitive Local Exchange Carrier Questionnaire.

TWTC claims that identified sections of the response contain proprietary, confidential business information as defined in Section 364.183, F.S., and thus, in accordance with Rule 25-22.006(5), Florida Administrative Code, TWTC asserts this "claim" of confidentiality and asks that the information be protected from public disclosure as provided under the Rule and Section 364.183.

Included with this filing, please find: (1) one confidential version of the response forms with the confidential information highlighted; (2) one copy of the highlighted forms on a CD, marked "confidential," and (3) two redacted copies of the response forms.

As always, if you have any questions whatsoever, please do not hesitate to contact me.

Sincerely,


Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK

COM	_____
AFD	_____
APA	_____
ECO	_____
ENG	_____
GCL	1 _____
IDM	_____
TEL	1 _____
CLK	_____

2015 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by April 15, 2015)¹

Utility Name: **tw telecom of florida l.p.**

Utility Code: TA 013

Contact name & title: Carolyn Ridley; Regulatory

Telephone number: 615-584-7372

E-mail address: Ridley.Carolyn@Level3.com

Stock Symbol (if company is publicly traded): LVLT

1. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2014**.

2. Are you currently operating under Chapter 7 or Chapter 11 bankruptcy protection?

 Yes (Chapter 7) Yes (Chapter 11) X 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 checked="" type="checkbox"/> Wholesale loops |
| <input checked="" type="checkbox"/> VoIP | <input type="checkbox"/> Fiber or copper based video service |
| <input checked="" type="checkbox"/> Wholesale transport | <input type="checkbox"/> Cable television |
| <input checked="" type="checkbox"/> Interexchange service | <input type="checkbox"/> Satellite television |
| <input 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.

<input type="checkbox"/> Residential	<input type="checkbox"/> Business
<input type="checkbox"/> 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. Please see Attached Page

6. Does your company currently publicly publish your service and price schedules for services offered in Florida at a location other than the Florida Public Service Commission? If yes, please indicate where and include the complete address or hyperlink if on a webpage. (Chapter 364.04, F.S.) **NO**

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.

2015 Competitive Local Exchange Carrier (CLEC) Questionnaire

(Due by April 15, 2015)

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The most fundamental threshold to local competition is nondiscriminatory interconnection with the incumbent, and the most important process to obtain nondiscriminatory interconnection is the public filing and opt-in provisions of Section 252 of the federal Act. Importantly, one of the last remaining responsibilities of the Florida Commission in telecommunications is ensuring that all interconnection agreements are filed, so that the process and competitive protections may work as intended.

The public filing of interconnection agreements allows any competitor to opt-into an agreement, avoiding unnecessary negotiation and potential litigation costs. Equally important, a filing requirement allows all carriers to review such agreements to determine whether there are discriminatory terms and bring such disputes to the Commission for resolution. Indeed, most (if not all) carriers first look to existing interconnection agreements before determining whether any negotiation is necessary.

Any dilution – much less outright evasion – of the public disclosure, filing and arbitration rights of Section 252 imposes a substantial barrier to entry and competition by imposing needless costs on competitors. It is a state Commission's duty to decide whether a contract is an interconnection agreement. An incumbent LEC may not grant itself "self-help" by deciding that a contract is not an interconnection agreement and, therefore, remove the state Commission from its statutory role.

It is well known that Verizon has a set of unfiled contracts relating, in some classified way, to the exchange of VoIP traffic. These contracts are being reviewed by the Massachusetts Department of Cable and Telecommunications, but that does not mean that the contracts are limited to that State. (The exact terms and scope of these agreements – including the list of states in which traffic may be affected – are not publically known).

The single most important step(s) that the Florida Commission can take to improve local competition in Florida is to use its statutory authority and determine (a) whether the Verizon agreements at issue in Massachusetts apply in Florida and, if so, (b) determine whether such agreements must be filed. Such agreements are commonly viable for multiple carriers, but they must be nondiscriminatory, publicly disclosed and available for opt-in to be useful.

Secondly, the forthcoming transition to IP-based services and associated facility retirements pose a number of concerns critical to competition in Florida (and the country). While no one, including the ILECs, can reliably predict the dates for the transition to occur, the ILECs already invoke the transition as the platform for a new order – one without last mile access alternatives (UNEs, special access and Ethernet) or their equivalents and without PSC-supervised interconnection. Debate over the legal foundation for the ILEC's new order aside, the CLECs contend that the new order, if left unchecked, will stunt competition in the business market and raise prices at a time when Florida promotes broad-based economic growth ("Open For Business") policies. The data for the

Commission's 2013 YE report bears out that competition in the business market in Florida is considerable; however, the CLECs who provide that competition rely significantly on regulated last mile alternatives and regulated interconnection to provide that competitive market share.

If, as the ILECs contend (and CLECs dispute), the retirement of TDM electronics and the retirement of copper facilities in the IP transition eliminates ALL of their obligations to provide last mile alternatives and, if, as a condition of those retirements, ILECs are not meaningfully constrained for any period of time in the rates, terms and conditions of replacement wholesale products (as CLECs contend they should), the cost for wholesale inputs to CLECs will undoubtedly increase even though the new ILEC IP network is less costly and more efficient than the old TDM one. Thus, Florida's competitive outlook, the CLECs assert, is one where (a) higher CLEC costs translate to higher retail rates to Florida businesses, (b) CLEC-provided competitive services cannot keep a check on higher ILEC rates in the retail market, and (c) overall customer choice is diminished. While some CLECs (such as Level 3) deploy last mile facilities where possible, CLEC self-deployment of last mile fiber is not the answer. No study or model is yet to show that the economics of self-deployment make sense for serving a limited and dispersed customer base of small and medium sized businesses, non-profits, and government buildings.

Notably, CLECs are not the only ones apprehensive about this outlook. State consumer advocates, public interest groups, business customers, local government customers and others who filed comments with the FCC have expressed these very same concerns.

In addition, if, as the two largest ILECs contend, the transition to IP means that networks are effectively closed -- as they were in the pre-divestiture days of Ma Bell -- and neither the FCC nor state commissions have any authority over the terms of interconnection, the cost of interconnection will undoubtedly rise. There will no longer be a regulatory backstop to level the playing field for the CLECs and their much larger and more geographically dominant competitors. In addition to the above concerns, the IP transition means all carriers will have to work through practical concerns about what the transition will mean for network interface requirements and compatible functionality.

Here, again, a level playing field and regulatory supervision will be vital to competition.

To be clear, the CLECs do not raise these concerns because we are opposed to the IP transition. CLECs recognize the benefits of the transition and, as a point of fact, were offering IP-based services in Florida before the ILECs could do so. Rather, the CLECs seek a thoughtful consideration of the impacts of the IP transition with regard to these issues so as to promote an environment that fosters broad-based economic activity in all sectors of the Florida economy, great and small.

In this regard, the Commission still has a vital role to play in the telecommunications marketplace. Retail services in Florida have been largely deregulated, and there will be IP transition related costs to consumers aside from higher wholesale costs -- such as revamped PSAP connectivity, peripheral device substitution/compatibility, battery back-up requirements, and so on -- which the IP trials will, at some point, hopefully inform. With respect to wholesale issues, the Commission clearly still has jurisdiction over such issues and carrier-to-carrier disputes under state and federal law, and it is here where the Commission may soon be involved with IP transition issues and should assume its proper role. Florida's consumers are reaping the benefits of a competitive telecommunications landscape today. The Commission can help ensure no harm is done to businesses, non-profits and government entities in the IP transition and that competition results in better pricing and more innovation for Florida.

FRN: 0014942668 tv telecom holdings inc.

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

Submission Status

Original - Submitted

Last Updated: May 14, 2015 17:35:43

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

Florida

* All fields are required

Lines provided to Unaffiliated Providers

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

Lines provided to End Users...

by Services Sold

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

by Product Type

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

by Ownership

1. Total: [] Owned: [] UNE-L: [] Resale: []

by Last-mile Medium

1. Total: [] FTTP: [] Coaxial Cable: [] Fixed Wireless: [] Copper: []

FRN: 0014942668 tw telecom holdings inc.

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

Submission Status

Original - Submitted

Last Updated: May 14, 2015 17:37:39

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

Florida

** All fields are required*

Grand Totals, by End-user Type

1. Total: Consumer: Business / Gov.:

Over-the-top Subscriptions

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

1. Total: Consumer: Business / Gov.:

All Other Subscriptions

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

by End-user Type

1. Total: Consumer: Business / Gov.:

by Services Sold

1. Total: Voice with Internet: Voice without Internet:

by Last-mile Medium

1. Total: [redacted] FTTP: [redacted] Coaxial Cable: [redacted] Fixed Wireless & Satellite: [redacted]

Copper: [redacted]