



April 13, 2018

Via Fed Ex Delivery

Ms. Beth W. Salak
Office of Telecommunications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: 2018 Local Competition Data Request

Dear Ms. Salak:

Enclosed for filing with the Commission is the 2018 Local Competition Report for DeltaCom LLC dba EarthLink Business - TX056 AND A COPY OF OUR Form 477 with the most current calendar year data as submitted March 1, 2018 to the FCC. Please note that data has been provided as of December 31, 2017. We request that information contained be treated as confidential. Per Ron Kooistra's conversation with Greg Fogleman on April 2, 2014, I understand the FCC Form 477 data attached with this filing will be treated as confidential.

Should you have any questions regarding this filing, please contact me at 954-252-1023 or via e-mail at Becky.West@windstream.com.

Sincerely,

Rebecca W West

Rebecca W. West
Staff Manager Regulatory Compliance

Enclosures

2018 Competitive Local Exchange Carrier (CLEC) Questionnaire

(Due by April 16, 2018)⁵

DeltaCom LLC
TX056
EarthLink Business

Contact name & title: Rebecca W West, Staff Manager Regulatory Compliance

Telephone number: 954-252-1023

E-mail address: Becky.West@windstream.com

Stock Symbol (if company is publicly traded): DeltaCom LLC dba EarthLink Business LLC is a privately owned, indirect subsidiary of Windstream Services LLC., which is publicly traded under the stock symbol "WIN".

Questions About Your Company

1. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2017**.
The attached 477 is a consolidated 477 filing including DeltaCom LLC dba EarthLink Business

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

Yes (Chapter 7) _____ Yes (Chapter 11) _____ No X

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 checked="" 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 |
| <input type="checkbox"/> Other | |

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.

Residential 0% Business 66% Not applicable _____

5. 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.)

Yes _____ If yes, where? _____ No X

6. Have you experienced any significant barriers in entering Florida's local exchange markets? Please describe any major barriers encountered that 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 information is welcome.

See attached

Please use additional paper if needed.

⁵ 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.

2018 Competitive Local Exchange Carrier (CLEC) Questionnaire

Questions About the Competitive Markets

6. Have you experienced any significant barriers in entering Florida's local exchange markets? Please describe any major barriers encountered that 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 information is welcome.

The pricing of type 2 access is very expensive and makes it hard to compete. In many instances what the ILEC charges a CLEC for last-mile access is higher than what the ILEC itself is selling on a retail basis to its own customers. Windstream has documented these problems in a proceeding at the FCC. See *Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143; *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, WC Docket No. 15-247; *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Service*, RM-10593.

Another barrier is the ILECs' practice of passing through special construction charges to companies like Windstream, which blocks access for the customer. In many cases customers believe they can avoid special construction if they buy directly from the incumbent. The incumbents do not act quickly and are generally unresponsive to trouble tickets and make installation coordination difficult.