2000 ALEC Data Request

Global NAPS, Inc. 10 Merrymount Road Quincy, MA 02169 State Code TX224



Florida Statute 364.02(2) defines basic local service as:

"Basic local telecommunications service" means voice-grade, flat-rate residential and flat-rate single line business local exchange services which provide dial tone, local usage necessary to place unlimited calls within a local exchange area, dual tone multi-frequency dialing, and access to the following: emergency services such as '911," all locally available interexchange companies, directory assistance, operator services, relay services, and an alphabetical directory listing. For a local exchange company, such terms shall include any extended are service routes, and extended calling service in existence or ordered by the commission on or before July, 1 1995.

Are you providing service to service to residential customers in Florida that complies with the above

b.	To how many residential customers are you providing basic local service in Florida?  N/A
C.	What are your current rates for providing residential basic local service?  N/A
d.	Are you providing service to business customers in Florida that complies with the above definition of basic local service?  No.
e.	To how many business customers are you providing basic local service in Florida?  N/A
f.	What are your current rates for providing business basic local service in Florida?  N/A
	not meet Florida's statutory definition of basic local service ? (Examples could include:
multi amoi	line business users; services with toll or usage restrictions; mandatory 900 blocking: limited unt of local calling included in the monthly charge; bundled service offerings; etc.) yes, continue with question #2; if no, skip to Question #3) -  Are you currently providing other forms of local service to residential customers in Florida?
multi amoi (If	line business users; services with toll or usage restrictions; mandatory 900 blocking: limited ant of local calling included in the monthly charge; bundled service offerings; etc.)  yes, continue with question #2; if no, skip to Question #3) -  Are you currently providing other forms of local service to residential customers in Florida?  No.  If the response to a. is affirmative, please describe each of the forms of local service you are providing to residential customers in Florida. (if available, please provide brochures or comparable materials.)
 multi amoi (If a.	line business users; services with toll or usage restrictions; mandatory 900 blocking: limited ant of local calling included in the monthly charge; bundled service offerings; etc.)  yes, continue with question #2; if no, skip to Question #3) -  Are you currently providing other forms of local service to residential customers in Florida?  No.  If the response to a. is affirmative, please describe each of the forms of local service you are providing to residential customers in Florida. (if available, please provide brochures
multi amou (If a. b.	line business users; services with toll or usage restrictions; mandatory 900 blocking: limited ant of local calling included in the monthly charge; bundled service offerings; etc.)  yes, continue with question #2; if no, skip to Question #3) -  Are you currently providing other forms of local service to residential customers in Florida?  No.  If the response to a. is affirmative, please describe each of the forms of local service you are providing to residential customers in Florida. (if available, please provide brochures or comparable materials.)  N/A  If the response to a. is affirmative, please indicate your current rates for each of the services indicated in response to b.

1. a.

	the services indicated in response to e.  \$500.00/month/PRI
Ple	ase describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, bundled network elements, facility-based, etc.).
a.	Please indicate, by exchange, the number of LEC access lines you are reselling to residential customers.  None.
b.	Please indicate, by exchange, the number of LEC access lines you are reselling to business customers.  None.
C.	Please indicate, by exchange, the types of unbundled network elements, if any, you are obtaining from the incumbent LEC.  None.
d.	Please indicate, by exchange, the number of unbundled local loops, if any, you are obtaining from the incumbent LEC.  None.
e.	Please indicate the types of facilities deployed by your company in Florida to provide local telephone services, and indicate where these facilities are deployed.
f.	If known, please indicate the number of access lines, separately for residential and business customers, provisioned solely over company-owned facilities.  None.
9.	Please indicate, by exchange, the number of business access lines you serve that are provided to internet service providers.
h.	Please indicate, by exchange, the number of business access lines you serve that are provided to voicemail service providers.  None.
Plea Use	se indicate the number and location of switches you have located in Florida, if any, d to provide services to customers in Florida  See Response to 3e above.
serv	each exchange where you are providing any form of residential local telephone ice, please identify by exchange (a list of exchanges is attached), the number of dential access lines served as of June 30, 2000. (See example below)  None.
plea	each exchange where you are providing any form of business local telephone services, use identify by exchange, the number of business access lines served as of June 30, 2000. The example below)
	See also
	response to question 3g above.

Examples

4.

5.

6.

3.

For	billing and accounting purposes, do you differentiate between residential and iness customers?
busi	No.
а.	Are you currently offering any enhanced services? If yes, what are they?  No. N/A
b.	Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.  See attachment hereto.
d.	Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.  See attachment hereto.
9.	Do your anticipate that your long-term manner of providing service will differ from your current practice? If so, do you expect becoming a full-scale facilities-based provider?  Decision unknown at this time.
f.	Have you been assigned your own NXX codes? If yes, how many codes have you been assigned and for each code, as of January 31, 2000, how many numbers have been assigned from the code?
f yoι	are not currently providing local telephone service in Florida:
a.	Please explain why you are not providing local telephone service. For example, have you experienced marketing or billing difficulties? Lack of capital? Customers are not willing to try something new? Lack of expertise in telecommunications? Difficulties dealing with the LEW insufficient profit margin?  N/A
b.	Do you anticipate providing local telephone service at some future date? If yes, please indicate when. (e.g., first quarter 2000)  N/A
C.	Please describe the most important factors that you believe are inhibiting your ability to provide local telephone service, and describe how these factors have adversely affected your entry.  N/A
d.	Are you currently providing any other telecommunications services in Florida (i.e., other than local service)? If yes, please list the services provided.  N/A
line	ease list your primary line of business (for example, entertainment cable television, private e, special access service, interexchange service, local service, cellular service, paging service, ectric service, municipality, etc.).  Local service.
	any time during the last 12 months have you provided local telephone services in Florida and en withdrawn the service? If yes, please discuss the reasons for this decision.  No.
ca	you or an affiliate provides cable television in Florida, do you offer any package plans combining ble television and local telephone services? If so, please indicate where such packages are ing offered.  N/A

Business Access Lines - 255 Business Access Lines - 202

Miami Exchange: Residential Access Lines - 154 Yulee Exchange: Residential Access Lines - 161

12.	If you or an affiliate provides long distance telephone service in Florida, do you offer any package plans combining long distance and local telephone services? If so, please describe any such plans and their terms and conditions. Is subscribing to both IM21 telephone and long dist3nce a condition of providing service?  No. N/A
13.	If you or an affiliate's primary business is unrelated to the provision of telecommunications, please indicate the nature of such primary business(es). Examples of such businesses could include, but are not limited to: pawn shops, title loan companies, alternative automobile financing, internet service providers, or check cashing services.  N/A
14.	Please describe any actions available to the Florida Public Service Commission which you believe should be taken to foster local exchange competitive market entry.  See attachment hereto.
15.	Please describe any actions which you may believe should be taken by the Florida legislature that would foster local exchange competitive market entry.  See attachment hereto.
16.	Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles.
	See attachment hereto.

## ATTACHMENT TO RESPONSE OF GLOBAL NAPS, INC. TO 2000 ALEC DATA REQUEST

In Global NAPs' response to the 1999 ALEC data request, I informed the commission of the difficulties Global NAPs had with Bell South in terms of our ability to opt into an existing interconnection agreement between Bell South and DeltaCom and the position that Bell South took to the payment of reciprocal compensation for ISP bound traffic. One year later, the matter is still open and pending before the Commission. The Commission ruled that Bell South was obligated to pay Global NAPs reciprocal compensation for ISP bound calls. The matter is still under review. I stated a year ago that Bell South was frustrating the intent of the Telecommunications Act in its conduct with respect to interconnection with Global NAPs and nothing in that regard has changed.

Congress recognized the inherent power of the monopolist to deter competition in the local market when it enacted the Telecommunications Act. The large and powerful ILECs have unequal bargaining power with the smaller ALECs. Global NAPs maintains that the opt in and reciprocal compensation provisions of the Act were designed to level the playing field. As stated above, Global NAPs has had difficulty with BellSouth over Interconnection issues. The ILECs understand that any delay they can impose on the process will cause financial hardship to ALECs. Since time works in favor of the ILECs, Global NAPs believes that the Commission should formulate an expedited review process for ALEC complaints to deprive the ILECs of any benefit they might get from delays in the normal complaint process.

Global NAPs believes that the actions of BellSouth with respect to the rights of the parties opting into existing agreements hinder entry into the market. Global NAPs also believes that as Interconnection Agreements expire, ALECs will have difficulty negotiating new agreements. Global NAPs believes that the Florida legislature should consider enacting statutes which will address these issues.

Global NAPs also believes that the Florida legislature should consider legislating reciprocal compensation for ISP traffic. In last year's report, Global NAPs requested that the Florida legislature consider this issue as the status of reciprocal compensation for ISP bound traffic was in flux. The situation has not improved, especially since the FCC's February 26, 1999 Internet Traffic Order was vacated and remanded by the United States Court of Appeals for the District of Columbia Circuit.