BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Juna

CLU 213 PM 4:53

I. DEWED TPSC

In re: Implementation of requirements arising from Federal Communications Commission's Triennial UNE review: Location Specific-Review for DS1, DS3, and Dark Fiber Loops and Route-Specific Review for DS1, DS3, and Dark Fiber Transport. DOCKET NO. 030852-TP

CLERK

JANUARY 13, 2004

NUVOX'S RESPONSES TO STAFF'S INTERROGATORIES - REDACTED VERSION

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, NuVox Communications, Inc., by and through its undersigned attorney, hereby responds to the following Interrogatories from Staff.

Interrogatories to CLECs – Regarding Dedicated Interoffice Transport

 (a) Please identify all points within Florida at which you connect your local network facilities to the networks of carriers other than the incumbent LEC, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence ("POP"), network access point ("NAP"), collocation hotel, data center, or similar facility.

RESPONSE:

This information is not available.

(b) For each transport facility identified in (a), please identify the cost of the facility, including the installation cost for any facilities that you have deployed yourself, and the rates, terms and conditions of any transport facilities that you obtain through a wholesale, lease, or resale arrangement, from any entity other an ILEC.

DOCUMENT NUMBER-DATE 00549 JAN 13 3 FPSC-COMMISSION CLERK

Not Applicable.

2. (a) Please identify all competing providers with which you are not affiliated that to your knowledge have deployed dark fiber facilities (including any facilities obtained on a long-term, indefeasible right of use basis) along any routes in Florida. For each such competitor, state your basis for making this assertion.

RESPONSE:

NuVox does not have access to this information.

(b) For each competing provider identified in (a), identify the particular route or routes along which the competitor is asserted to have such facilities. State whether or not to your knowledge those facilities terminate at a collocation arrangement where each end of the transport route is located at an ILEC premises, or in a similar arrangement at which one end of the transport route is located at an ILEC premises or where neither end is located at an ILEC premises.

RESPONSE:

NuVox does not have access to this information.

3. Please identify all fiber rings in Florida that you own or otherwise control, and identify the location (by street address and V&H coordinates) of each add-drop multiplexer or comparable facility for connecting other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.

RESPONSE:

NuVox does not own or control any fiber rings in Florida.

4. (a) Have you entered into an agreement for joint construction of transport facilities with any ILEC?

RESPONSE:

No.

(b) If the response to (a) is affirmative, please identify the pairs of ILEC wire centers between which joint construction of transport facilities either has occurred or is planned to occur.

RESPONSE:

Not applicable.

(c) If the response to (a) is affirmative, please identify the ILEC involved, when the agreement was entered into, and the status of the joint construction

RESPONSE:

Not applicable.

(d) If the response to (a) is negative, have you attempted to negotiate any agreement with an ILEC for the joint construction of transport facilities?

RESPONSE:

No.

(e) If the response to (d) is affirmative, please describe any attempts made to enter into such agreements and the results of such negotiations.

RESPONSE:

Not applicable.

(f) If the response to (d) is negative, please explain why no such negotiations have been attempted.

Cost prohibitive.

(g) Have you entered into an agreement for joint construction of transport facilities with any other CLEC or utility company (e.g., cable television, electric, gas, water and sewer)?

RESPONSE:

No.

(h) If the response to (g) is affirmative, please identify the beginning, ending and intermediate terminating points for all such routes where joint construction of transport facilities either has occurred or is planned to occur.

RESPONSE:

Not applicable.

(h) If the response to (g) is affirmative, please identify, for each such agreement, the entities involved, when the agreement was entered into, the type of joint construction used (e.g., joint trenching, composite cable, etc.), the total cost savings achieved by the joint venture, and the status of the joint construction

RESPONSE:

Not applicable.

(i) If the response to (g) is negative, have you attempted to negotiate any agreement with any other CLEC or utility company for the joint construction of transport facilities?

RESPONSE:

No.

(i) If the response to (j) is affirmative, please describe any attempts made to enter into such agreements and the results of such negotiations, whether you have evaluated any possible economic advantages of jointly constructing transport facilities and the results of any such evaluations.

RESPONSE:

Not applicable.

(j) If the response to (j) is negative, please explain why no such negotiations have been attempted.

RESPONSE:

Cost and current facilities are available from ILEC or in place from a third party.

Interrogatories to CLECs - Regarding Collocation

5. (a) Please identify the address of each of your collocation arrangements in the state of Florida, the name of the ILEC central office in which it is located, and the ILEC.

RESPONSE:

See Attachment 5a-e.

(b) For each collocation arrangement identified in response to (a), please identify the overall size of the arrangement and the amount of unused space in the collocation arrangement.

RESPONSE:

See Attachment 5a-e.

(c) For each collocation arrangement identified in response to (a), please identify the date on which collocation space was turned over to you.

See Attachment 5a-e.

(d) For each collocation arrangement identified in response to (a), please identify the date on which equipment was installed in the space and first used to provide local service. (Estimate if necessary.)

RESPONSE:

See Attachment 5a-e.

(e) For each collocation arrangement identified in response to (a) that is not currently being used to provide local service, please indicate the date on which you intend to use the space to provide local service.

RESPONSE:

All colocations provide local service.

6. (a) Please identify the address of each collocation arrangement in the state of Florida that you share with another entity, the identity of the other entity, and the size of your share of the arrangement.

RESPONSE:

Not applicable.

(b) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) you currently provide with the existing equipment located there.

RESPONSE:

Not applicable.

(c) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the equipment is not currently being used to provide but is capable of providing.

RESPONSE:

Not applicable.

(d) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the existing equipment is incapable of providing.

RESPONSE:

Not applicable.

(e) For those services identified in response to (d), can the equipment located in the given collocation arrangement be upgraded to provide local service?

RESPONSE:

Not applicable.

(f) If the response to (e) is affirmative, please describe the nature of the required upgrade, the approximate cost of the upgrade, the time required to perform the upgrade, and any operational barriers to performing the upgrade.

RESPONSE:

Not applicable.

(a) Please identify the address of each of your collocation arrangements in the state of Florida that you obtain from an entity other than the ILEC, entity, the identity of the other entity, the size of the arrangement, and the amount of unused space in the collocation arrangement.

Not applicable.

(b) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) you currently provide with the existing equipment located there.

RESPONSE:

Not applicable.

(c) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the equipment is not currently being used to provide but is capable of providing.

RESPONSE:

Not applicable.

(d) For each of the arrangements identified in response to (a), please identify the types of services (e.g., local, broadband, etc.) that the existing equipment is incapable of providing.

RESPONSE:

Not applicable.

(e) For those services identified in response to (d), can the equipment located in the given collocation arrangement be upgraded to provide local service?

RESPONSE:

Not applicable.

(f) If the response to (e) is affirmative, please describe the nature of the required upgrade, the approximate cost of the upgrade, the time required to perform the upgrade, and any operational barriers to performing the upgrade.

RESPONSE:

Not applicable.

Interrogatories to CLEC's regarding High Capacity Loops and Dark Fiber

8. (a) Are you familiar with Fiberloops (<u>www.fiberloops.com</u>), a matchmaking service for companies looking for fiber, optical bandwidth and collocation space?

RESPONSE:

No.

(b) If the response to (a) is affirmative, are you now or have you been, a client of Fiberloops?

RESPONSE:

Not applicable.

(c) If the response to (b) is affirmative, please describe what services Fiberloops has provided or is providing your company.

RESPONSE:

Not applicable.

9. (a) For each DS1, DS3, or dark fiber loops you have deployed to customer locations in Florida, please indicate (i) whether you are collocated in a central office that serves that building; (ii) the amount of cross-connect/termination capacity available at your collocation space for wholesale facilities provided; (iii) the time it takes to provision a loop to another carrier that is collocated in the same central office; and (iv) the time it takes to provision a loop to a carrier that is not collocated in the same central office.

RESPONSE:

- (i) See Attachment 9(a)(i) attached.
- (ii) We currently do not use wholesale providers other than the ILEC.
- (iii) Unknown other than the ILEC.
- (iv) Unknown.
- (b) With respect to the facilities identified in response to (a), please identify which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

RESPONSE:

Not applicable.

10. Please identify any customer locations, by address and capacity, to which you are currently in the process of deploying your own high-capacity loop facilities (currently being planned, designed, or under construction).

RESPONSE:

Not applicable.

11. (a) Are you providing fixed wireless service to end users in the state of Florida?

RESPONSE:

No.

 (b) If the response to (a) is affirmative, please identify the cities in which this service is being provided and state whether those facilities are capable of providing high capacity service.

RESPONSE:

Not applicable.

(c) If you are providing high capacity service using fixed wireless in the state of Florida, please identify the addresses of the specific building locations.

RESPONSE:

Not applicable.

12. (a) Do you hold licenses for wireless spectrum in the state of Florida?

RESPONSE:

No.

(b) If the response to (a) is affirmative, please state in what areas in Florida and what percent of Florida customers could be covered using this spectrum.

RESPONSE:

Not applicable.

(b) If the response to (a) is affirmative, have you leased any of your licenses to other entities?

RESPONSE:

Not applicable.

(d) If the response to (c) is affirmative, please identify the entities to whom you have leased spectrum licenses.

Not applicable.

13. (a) Over the past 5 years, have you entered into an agreement for joint construction of high capacity or dark fiber loops facilities with any ILEC, CLEC or utility company (e.g., cable television, electric, gas, water and sewer)?

RESPONSE:

No.

(b) If the response to (a) is negative, please describe any attempts made to enter into such an agreement and the results of such negotiations.

RESPONSE:

Not applicable.

(c) If the response to (a) is affirmative, please describe the number of such agreements by type of joint construction used (e.g., joint trenching, composite cable, etc.), the range, median and mode of the number of entities involved in the agreement, and the percent of cost savings achieved by joint construction.

RESPONSE:

Not applicable.

14. (a) Do you own or control an existing coaxial cable infrastructure?

RESPONSE:

No.

(b) If the response to (a) is affirmative, please identify (i) the average cost per foot to upgrade to fiber access; (ii) whether you are offering or plan to offer high capacity service; (iii) the area within the state of Florida covered by your coax cable infrastructure; and (iv) the area within the state of Florida covered by your fiber infrastructure.

RESPONSE:

Not applicable.

umans Jon C. Moyle, Jr.

Florida Bar No. 0727016 Diana K. Shumans Florida Bar No. 0675822 Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 Telephone: (850) 681-3828 Facsimile: (850) 681-8788

Attorneys for NuVox Communications, Inc

CERTIFICATE OF SERVICE Docket No. 030852-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and Hand Delivered* this 13th day of January 2004, to the following:

Jason Rojas, Staff Counsel * Jeremy Susac, Staff Counsel Adam Teitzman, Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Phone: (850) 413-6212 Fax: (850) 413-6212 Fax: (850) 413-6250 <u>ateitzma@psc.state.fl.us</u> <u>jrojas@psc.state.fl.us</u> jsusac@psc.state.fl.us

Michael A. Gross VP Reg. Affairs & Reg. Counsel Florida Cable Telecomm. Assoc. 246 East 6th Avenue Tallahassee, FL 32303 Tel. No. (850) 681-1990 Fax. No. (850) 681-9676 <u>mgross@fcta.com</u>

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold PA 117 South Gadsden Street Tallahassee, FL 32301 Tel. No. (850) 222-2525 Fax. No. (850) 222-5606 Attys. for Covad jmcglothlin@mac-law.com vkaufman@mac-law.com Charles E. Watkins Covad Communications Company 1230 Peachtree Street, N.E. 19th Floor Atlanta, Georgia 30309 Tel. No. (404) 942-3492 Fax. No.(404) 942-3495 gwatkins@covad.com

Nanette Edwards, Esq. Director – Regulatory ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802 Tel. No. (256) 382-3856 nedwards@itcdeltacom.com

Floyd Self, Esq. + Norman H. Horton, Esq. ~ Messer Caparello & Self 215 South Monroe Street, Suite 701 Tallahassee, FL 32301 Tel. No. (850) 222-0720 Fax. No. (850) 224-4359 Represents ITC^DeltaCom, Represents KMC Represents MCI Represents Xspedius~ <u>fself@lawfla.com</u> nhorton@lawfla.com

De O'Roark, Esq. + MCI WorldCom Communications, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328 <u>dc.oroark@wcom.com</u>

Andrew O. Isar Miller Isar, Inc. 7901 Skansie Avenue Suite 240 Gig Harbor, WA 98335 Tel. No. (253) 851-6700 Fax No. (253) 851-6474 aisar@millerisar.com Jason Spinard, Esq. Rand Currier Geoff Cookman Granite Telecommunications, LLC 234 Copeland Street Quincy, MA 02169 Tel. No. 617 847-1500 Fax No. 617 847-0931 jspinard@granitenet.com rcurrier@granitenet.com gcookman@granitenet.com

Donna McNulty, Esq. + MCI WorldCom Communications, Inc. 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 donna.mcnulty@mci.com

Tracy Hatch, Esq. AT&T 101 North Monroe Street Suite 700 Tallahassee, FL 32301 Tel. No. (850) 425-6360 thatch@att.com

Lisa A. Sapper + AT&T 1200 Peachtree Street, N.E. Suite 8100 Atlanta, GA 30309 Tel. No. (404) 810-7812 <u>lisariley@att.com</u>

Jake E. Jennings NewSouth Communications Corp Two North Main Center Greenville, SC 29601-2719 Tel. No. 864 672-5877 Fax No. 864 672-5313 jejennings@newsouth.com Marva Brown Johnson, Esq. KMC Telecom III, LLC 1755 North Brown Road Lawrenceville, GA 30034-8119 marva.johnson@kmctelecom.com

Susan S. Masterton, Esq. Sprint-Florida, Inc. Sprint Communications Co. L.P. 1313 Blair Stone Road P.O. Box 2214 Tallahassee, FL 32316-2214 Tel. No. (850) 599-1560 Fax. No. (850) 878-0777 susan.masterton@mail.sprint.com

Jeffrey J. Binder Allegiance Telecom of Florida, Inc. 1919 M Street, N.W. Washington, DC 20037 Tel. No (202) 464-1792 Jeff.binder@algx.com

Terry Larkin Allegiance Telecom, Inc. 700 East Butterfield Road Lombard, IL 60148 Phone: (630) 522-6453 terry.larkin@algx.com

Jean Houck Business Telecom, Inc. 4300 Six Forks Road Raleigh, NC 27609 Tel. No. (919) 863-7325 jean.houck@bitelecom.net

Margaret Ring, Director Regulatory Affairs Network Telephone Corporation 815 S. Palafox St. Pensacola, FL 32501 850-465-1748 Margaret.Ring@networktelephone.net AT&T by E-Mail only: + soniadaniels@att.com

. .

humans 1 Jon C. Moyle, Jr.