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May 22, 1998

OF COUNSEL: CHARLES F. DUDLEY

GOVERNMENTAL CONSULTANTS:

PATRICK R. MALOY AMY J. YOUNG

HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center Room 110 Tallahassee, Florida 32399-0850

980786-TZ

Re: In re: April 13,1998 Data Request served by Florida Public Service Commission staff concerning the provision of unbundled network elements and the status of local exchange competition

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc./TCG South Florida ("TCG") are the following documents:

- 1. Original and fifteen copies of TCG's Notice of Intent to Request Confidential Classification; and
  - 2. An envelope containing a copy of the document marked "Confidential."

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filin

RECEIVED & FILED

Sincerely.

This Notice of Intent was filed with Confidential Document No. <u>05762-18</u>. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

PSC-BUREAU OF RECORDS

Kenneth A Hoffman

KAH/rl Enclosures DOCUMENT NUMBER-DATE

05701 HAY 22 #

FPSC-RECORDS/REPORTING

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

	_)	Filed: May 22,	1998
exchange competition.	)		
elements and the status of local	)		
provision of unbundled network	)		
Commission Staff concerning the	)		
served by Florida Public Service	)		
In re: April 13, 1998 Data Request	)		

# TELEPORT COMMUNICATIONS GROUP INC./ TCG SOUTH FLORIDA'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

PLEASE TAKE NOTICE that Teleport Communications Group Inc./TCG

South Florida ("TCG") intends to request confidential classification of its responses to the April 13, 1998 Staff Data Request concerning the provision of unbundled network elements and the status of local exchange competition.

This Notice is filed pursuant to Rule 25-22.006(3)(a), Florida Administrative Code. A copy of the staff data request is attached hereto as Exhibit A. A copy of TCG's confidential response to the Staff Data Request is filed herewith in an envelope marked "confidential." TCG will seek continued confidential handling by filing a Request for Confidential Classification within twenty-one days.

Respectfully submitted,

KENNETH A. HOFFMAN, ESQ.

JOHN R. ELLIS, ESQ.

Rutledge, Ecenia, Underwood,

Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788 (telephone)

(850) 681-6515 (fax)

DOCUMENT NUMBER-DATE

05701 MAY 22 8

FPSC-RECORDS/REPORTING

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of foregoing was furnished by hand delivery to the following this 22nd day of May, 1998:

Martha Carter Brown, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Room 370 Tallahassee, FL 32399-0850

Ms. Mary Rose Sirianni
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 282A
Tallahassee, FL 32399-0850

KENNETH A. HOFFMAN, ESQ.

tcg.3notice

#### STATE OF FLORIDA

Commissioners:
Julia L. Johnson, Chairman
J. Terry Deason
Susan F. Clark
Joe Garcia
E. Leon Jacobs, Jr.



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

# Public Service Commission

April 13, 1998

Mr. Kenneth A. Hoffman TCG South Florida P. O. Box 551 Tallahassee, FL 32302-0551

Dear Mr. Hoffman:

In anticipation of BellSouth Telecommunications, Inc. request to provide interLATA services pursuant to Section 271(c)(1)(A) of the Telecommunications Act, we would like to acquire information in order to evaluate how local service competition is developing in Florida. The following questions relate to the provision of unbundled network elements (UNEs) and the status of local exchange competition in the business and residential markets.

- 1. Is BellSouth currently providing you with access to UNEs at any technically feasible point in accordance with the requirements of Section 251(c)(3) of the Telecommunications Act of 1996 and pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC and FPSC?
  - a. If yes, please list the following information:
    - 1. each element being provided by BellSouth,
    - 2. the point of interconnection being provided for each element,
    - 3. the rate being charged for each element.
    - 4. the reason(s) why any element requested from BellSouth was not provided; and
    - 5. the reason(s) why the point of interconnection requested from BellSouth was not provided.
- 2. Do you currently provide local exchange service in Florida either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from an incumbent local exchange company (ILEC) in Florida? If yes:
  - a. is it being provided solely to business customers, solely to residential customers, or both?
- b. Through the use of your facilities and UNE's purchased from an ILEC, please provide the following:
  - 1. the number of business subscribers you are serving in Florida?

/ARD • TALLAHASSEE, FL 32399-0850 Employer

Internet E-mail: contact@psc.state.fl.us

- 2. the number of business subscriber lines that you service in Florida?
- 3. the number of residential subscribers you are serving in Florida?
- 4. the number of residential subscriber lines that you service in Florida?
- 3. If your response to 2 is in the affirmative, do you currently provide local exchange service in BellSouth's territory to business customers either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from BST? If yes:
  - a. Through the use of your facilities and UNE's purchased from BST, please provide the following:
    - 1. the number of business subscribers you are serving in BellSouth's territory in Florida?
    - 2. the number of business subscriber lines that you service in BellSouth's territory in Florida?
- 4. If your response to 2 is in the affirmative, do you currently provide local exchange service in BellSouth's territory to residential customers either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from BST? If yes:
  - a. Through the use of your facilities and UNE's purchased from BST, please provide the following:
    - 1. the number of residential subscribers you are serving in BellSouth's territory in Florida?
    - 2. the number of residential subscriber lines that you service in BellSouth's territory in Florida?

Please provide a response by May 15, 1998. If you have any questions concerning these data requests or if you need any clarification, please contact MaryRose Sirianni at (850) 413-6564.

Sincerely,

Walter D'Haeseleer

Director

Division of Commission

WDH/MRS