

# **DATA REQUESTS OF JULY 10, 1998**

Response of Comcast Telephony Communications of Florida, Inc.

# Question No. 1

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# Are you currently providing basic local service in Florida?

No. CTCFL is not currently providing basic local exchange service in Florida.

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### Response of Comcast Telephony Communications of Florida, Inc.

### **Question No. 2**

If you are not currently providing basic local service in Florida:

a) Please explain why you are not yet providing basic local service. For example, are you experiencing marketing or billing difficulties" Lack of capital? Customers are no willing to try something new? Lack of expertise in telecommunications? Difficulties dealing with the incumbent telecommunications company? Insufficient profit margin? Etc.

CTCFL is in the process of rolling out basic local exchange services in Florida; however, the company has not yet commenced its marketing of basic local exchange services to customers. The entity currently provides limited private line Asynchronous Transfer Mode services in northern Florida.

 Please explain under what conditions you believe your company would consider providing basic local service.

Not applicable. Please see response to Question No. 2(a).

c) Do you anticipate providing basic local service at some future date? If so, please indicate the date or time-frame (e.g., fall of 1998, first quarter 1999).

d) Please identify the three most important factors that are inhibiting your ability to provide basic local service, and describe how these factors have adversely affected your entry.

Not applicable. Please see response Question No. 2(a).

e) Are you currently providing any other telecommunications services? If so, please list the telecommunications services you provide.

Yes. Please see response to Question No. 2(a).

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### DATA REQUESTS OF JULY 10, 1998

#### Response of Comcast Telephony Communications of Florida, Inc.

#### Question No. 3

If you are currently providing basic local service in Florida:

a) Is service being offered solely to residential customers, business customers, or both?

Not applicable. Please refer to Question No. 2.

b) Please describe the method(s) you are using to provide basic local service, e.g., resale, interconnection, unbundled network elements.

Not applicable. Please refer to Question No. 2.

c) For each exchange where you are providing basic local service, please identify, by exchange (an exchange list and map are attached), the number of business access lines served.

Not applicable. Please refer to Question No. 2.

d) For each exchange where you are providing basic local service, please identify by exchange (an exchange list and map are attached), the number of residential access lines served.

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Not applicable. Please reference Question No. 2.

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# Response of Comcast Telephony Communications of Florida, Inc.

#### **Question No. 4**

# a) Do you provide basic local service in any other sates? If so, please identify in which states and in which areas you provide basic local service. (e.g., in Illinois but only in the Chicago area)

An affiliate of CTCFL, Comcast Telephony Communications of Maryland, Inc. ("CTCMD"), provides basic local exchange service in the Baltimore, Maryland area.

# b) If you provide basic local service in other states, for each state please indicate whether you provide service to residential customers, business customers, or both?

CTCMD's basic local exchange services are being offered to both residential and business customers.

# c) For each state in which you are providing basic local service, please describe the method(s) you use to provide service - e.g., own facilities with only interconnection, resale of incumbent's services, unbundled network elements, etc.

CTCMD currently provides local exchange service in the Baltimore, Maryland area using a combination of its own facilities, facilities secured from third-party (non-ILEC) vendors, and services purchased from the ILEC (primarily, local number portability).

### d) For each state and geographic area in which you are providing basic local service, please indicate when you when you began service.

CTCMD commenced basic local exchange services in the Baltimore, Maryland area on January 29, 1998.

# e) For each state and geographic area in which you are providing basic local service, please describe the prevailing conditions which hastened your entry into that market, as opposed to the Florida market.

The roll out of local number portability throughout Maryland should proceed the availability of the same functionality in most areas of Florida. The availability of local number portability will be key to Comeast's ability to attract customers who are currently taking service from the RBOC.

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### Response of Comcast Telephony Communications of Florida, Inc.

### **Question No. 5**

# Please describe any actions available to the Florida Public Service Commission which you believe should be taken to foster local exchange competitive market entry.

CTCFL believes that the FPSC and the Florida legislature, as appropriate, should devote particular attention to ensuring the timely implementation of local number portability throughout Florida, as well as to performance measurements, performance standards and performance penalties for ILEC provisioning of unbundled network elements and of other incumbent services.

CTCFL is also concerned about the relatively recent introduction of ILEC intraLATAwide calling packages such as Area Plus, which provide unlimited calling within an entire LATA for one flat rate. ALECs which attempt to develop similar calling packages may be price squeezed by the relatively high access charges imposed by the ILEC for the termination of toll calls.

# b) Please describe any actions which you believe should be taken by the Florida legislature that would foster local exchange competitive market entry.

Please refer to CTCFL's response to Question No. 5(a).

# DATA REQUESTS OF JULY 10, 1998

# Response of Comcast Telephony Communications of Florida, Inc.

#### **Question No. 6**

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 comments on any 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.

CTCFL has no additional comments at this time. We are grateful for the opportunity to have participated in this inquiry.

### VERIFICATION

# STATE OF PENNSYLVANIA ) ) COUNTY OF PHILADELPHIA )

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I, John G. Sullivan, am Director of Regulatory Affairs for Comcast Telephony Communications of Florida, Inc., and I am authorized to make this verification on its behalf. I have reviewed the accompanying responses to Florida Public Service Commissions data requests nos. 1 through 6 and verify that the statements made therein are true and correct to the best of my knowledge, information and belief.

John G. Sullivan

Director of Regulatory Affairs

Subscribed and sworn to before me, in and for the state and county named above this 30th day of July, 1998.

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NOTARIAL SEAL GRACE M. SAPINOSA, Notary Public City of Philadelphia, Phila. County My Commission Espires July 20, 2002