

ORIGINAL

**COMCAST
CORPORATION**



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August 6, 1998

VIA FEDERAL EXPRESS

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

**Re: 1998 Competition Report/ALEC Data Requests; Request
For Confidential Classification of CMHTCFL**

Dear Ms. Bayo:


Enclosed herewith for filing in the above-referenced docket on behalf of Comcast MH Telephony Communications of Florida, Inc. ("CMHTCFL") are the following documents.

- 1. Original and fifteen copies of CMHTCFL's Request for Confidential Classification of its response to Data Request No. 3(c) and 3(d); *08412-98*
- 2. An envelope containing one proprietary copy of the document considered confidential; and *08413-98*
- 3. An attachment containing two expurgated copies of the document described in "2" above. *08414-98*

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

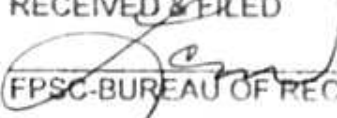
Thank you for your assistance with this filing.

Sincerely,


John G. Sullivan
Dep. Assn. General Counsel

cc: Ms. Laura King, FPSC (Letter and Petition Only)

Encl. (2)

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE
08412 AUG -7 98
TIME 10:00 AM

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FLORIDA PUBLIC SERVICE COMMISSION

DATA REQUESTS OF JULY 10, 1998

Response of Comcast MH Telephony Communications of
Florida, Inc.

Question No. 1

Are you currently providing basic local service in Florida?

Yes. CMHTCFL is currently providing basic local exchange service in Florida.

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FPSC RECORDS/REPORTING

FLORIDA PUBLIC SERVICE COMMISSION

DATA REQUESTS OF JULY 10, 1998

Response of Comcast MH 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.**

Not applicable. Please see response to Question No. 1.

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

Not applicable. Please see response to Question No. 1.

- 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).**

Not applicable. Please see response to Question No. 1.

- 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 to Question No. 1.

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

Not applicable. Please see response to Question No. 1.

FLORIDA PUBLIC SERVICE COMMISSION

DATA REQUESTS OF JULY 10, 1998

Response of Comcast MH 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?**

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

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

CMHTCFL currently provides local exchange service in southeastern Florida using a combination of its own facilities, facilities secured from third-party (non-ILEC) vendors, and facilities purchased from the ILEC (primarily Network Terminating Wire).

- 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.**

[REDACTED]

- 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.**

[REDACTED]

FLORIDA PUBLIC SERVICE COMMISSION

DATA REQUESTS OF JULY 10, 1998

Response of Comcast MH Telephony Communications of
Florida, Inc.

Question No. 4

- a) **Do you provide basic local service in any other states? 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 CMHTCFL, 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 Comcast's ability to attract customers who are currently taking service from the RBOC.

FLORIDA PUBLIC SERVICE COMMISSION

DATA REQUESTS OF JULY 10, 1998

Response of Comcast MH Telephony Communications of
Florida, Inc.

Question No. 5

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

CMHTCFL 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.

CMHTCFL is also concerned about the relatively recent introduction of ILEC intraLATA-wide 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 CMHTCFL's response to Question No. 5(a).

FLORIDA PUBLIC SERVICE COMMISSION

DATA REQUESTS OF JULY 10, 1998

Response of Comcast MH Telephony Communications of
Florida, Inc.

Question No. 6

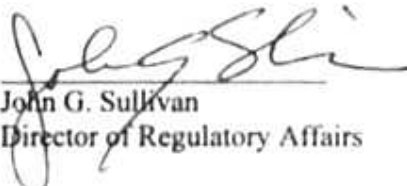
Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comments on any obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles.

CMHTCFL 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)

I, John G. Sullivan, am Director of Regulatory Affairs for Comcast MH 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.



Notary Public

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