



August 16, 2001
VIA OVERNIGHT DELIVERY

210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

RE: 2001 ALEC Data Request Responses;
**NewSouth Communications Corporation & UniversalCom, Inc. -
Claim of Confidential Treatment**

Dear Ms. Bayo:

Enclosed are the *combined* responses to the 2001 Florida ALEC Data Requests of NewSouth Communications Corp. and UniversalCom, Inc., which are being submitted at the request of Kevin Bloom in the Division of Competitive Services. The enclosed material is confidential and should be treated accordingly pursuant to Chapter 364.183(1), Florida Statutes. Pursuant to the requirements of Rule 25-22.006(5)(a), enclosed is one copy of the subject material with the confidential portions highlighted. Also enclosed are two redacted copies of the same material.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it in the self-addressed, stamped envelope enclosed for this purpose.

Any questions regarding this filing may be directed to my attention at (407) 740-8575.

Sincerely,

Robin Norton

Robin Norton
Consultant to NewSouth

cc: Marianne Valestin - NewSouth
Kevin Bloom - FPSC (transmittal only)

file: NewSouth - FL ALEC
UnivCom - FL ALEC
tms: FLL010x

This claim of confidentiality was filed by or on behalf of a "teleco" for Confidential DN 10117-01. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

RECEIVED-FPSC
01 AUG 17 AM 10:57
COMMISSION
CLERK

DISTRIBUTION CENTER
01 AUG 17 AM 10:00

Confidential
DOCUMENT NUMBER-DATE
10117 AUG 17
FPSC-COMMISSION CLERK

RECEIVED & FILED
RXM
FPSC-BUREAU OF RECORDS

Letter
DOCUMENT NUMBER-DATE
10116 AUG 17
FPSC-COMMISSION CLERK

Florida 2001 ALEC Data Request

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 service, and an alphabetical directory listing. For a local exchange company, such terms shall include any extended area service routes, and extended calling service in existence or ordered by the commission on or before July 1, 1995.

1. a. Are you providing service to residential customers in Florida that complies with the above definition of **basic local service**?

Yes

- b. To how many residential customers are you providing **basic local service** in Florida?

[REDACTED]

- c. What are your current rates for providing **basic local service**?

Rates range from \$4.38-\$11.81 depending on the ILEC territory and the rate group.

- d. Are you providing service to business customers in Florida that complies with the above definition of **basic local service**?

Yes

- e. To how many business customers are you providing **basic local service** in Florida?

[REDACTED]

- f. What are your current rates for providing business **basic local service** in Florida?

Basic local service is offered with term commitment discounts.

Basic Business Line with 1 year commitment - \$39.60/monthly

Basic Business Line with 2 year commitment - \$37.35/monthly

Basic Business Line with 3 year commitment - \$35.10/monthly

2. Are you currently providing other forms of local service (business or residential) in Florida that may not meet Florida's statutory definition of **basic local service**? (Examples could include: multi-line business users; services with toll or usage restrictions; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offerings; etc.)

(If yes, continue with question #2; if no, skip to Question #3)

Yes

- a. Are you currently providing other forms of local service to residential customers in Florida?

No

- b. 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 marketing brochures or comparable materials.)

None to residential customers

- c. If the response to a. is affirmative, please indicate your current rates for each of the services indicated in response to b.

Not Applicable

- d. Are you currently providing other forms of local service to business customers in Florida?

Yes

- e. If the response to d. is affirmative, please describe each of the forms of local service you are providing to business customers in Florida. (If available, please provide marketing brochures or comparable materials.)

PBX Service

Point to Point Service

ISDN PRI lines

- f. If the response to d. is affirmative, please indicate your current standard rates for each of the services indicated in response to e.

Point to Point –

IntraLata: Fractional T1 service 60.00/channel/month

Full T1 Service Price for T1, plus one channel charge of \$60.00

PBX Service

Year 1

Year 2

Year 3

Monthly

Monthly

Monthly

Recurring

Recurring

Recurring

T-1 Facility Access

Digital Local Channel Charge

\$189.00

\$178.00

\$168.00

Each Mile (per T1)

\$ 50.00

\$ 40.00

\$ 30.00

ISDN PRI

T-1 Access Line

\$220.00

\$200.00

\$180.00

3. Please describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.)

a. Please indicate, by exchange, the number of LEC access lines you are reselling to residential customers.

[REDACTED]

[REDACTED]

a. Please indicate, by exchange, the number of LEC access lines you are reselling to business customers.

[REDACTED]

[REDACTED]

- 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.

None.

- f. If known, please indicate the number of access lines, separately for residential and business customers, provisioned solely over company-owned facilities.

None.

- g. Please indicate, by exchange, the number of business access lines you serve that are provided to Internet service providers.

[REDACTED]

- h. Please indicate by exchange, the number of business access lines you serve that are provided to voicemail service providers.

None.

4. Please indicate the number and locations of switches you have located in Florida, if any, used to provide services to customers in Florida.

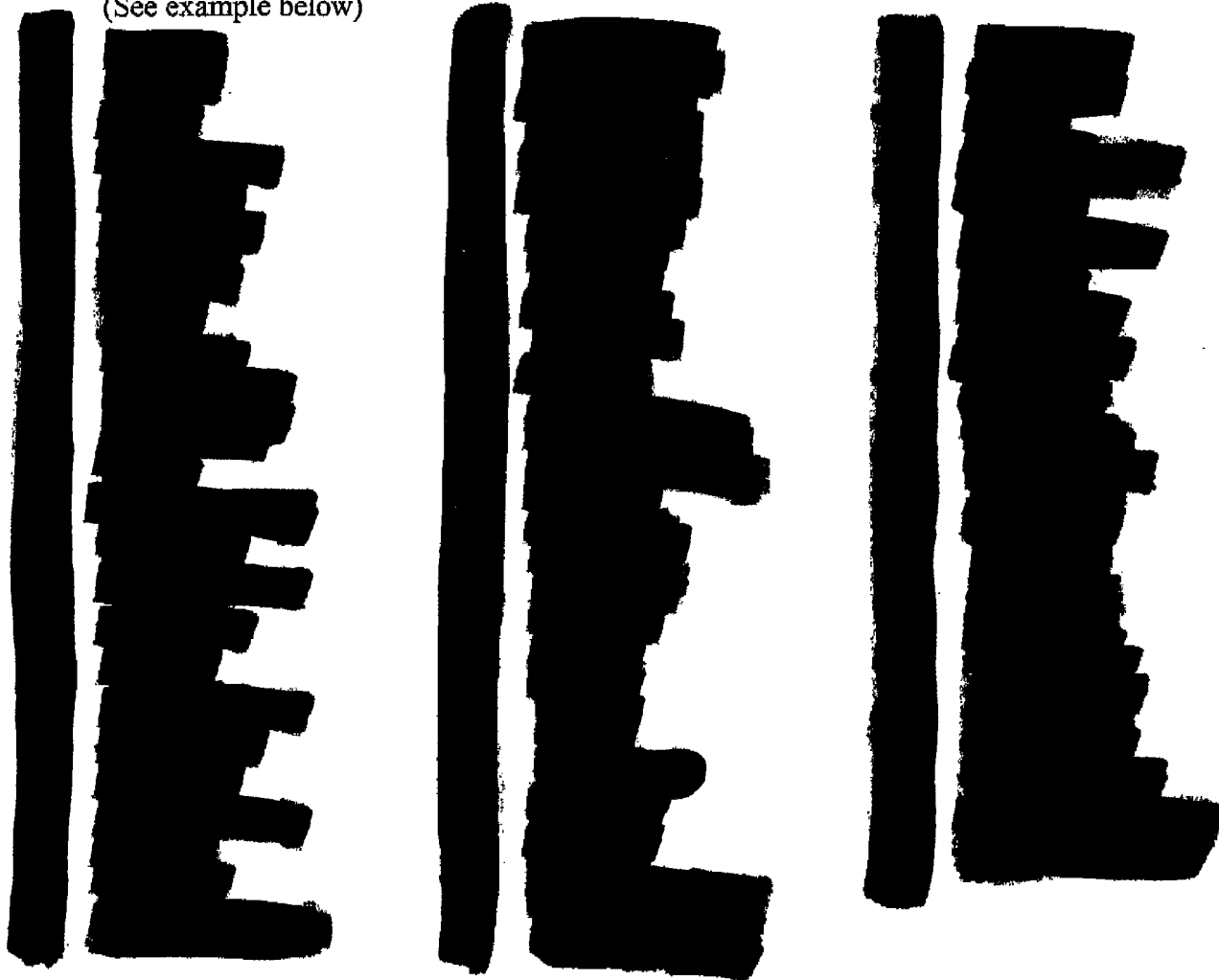
[REDACTED]

5. For each exchange where you are providing any form of residential local telephone service, please identify by exchange (a list of exchanges is attached), the number of residential access lines served as of June 30, 2000. (See example below)

[REDACTED]

[REDACTED]

6. For each exchange where you are providing any form of business local telephone services, please identify by exchange, the number of business access lines served as of June 30, 2000 (See example below)



Examples

*Miami Exchange: Residential Access Lines – 154
Business Access Lines – 255*

Yulee Exchange: Residential Access Lines – 161

Business Access Lines – 202

7. For billing and accounting purposes, do you differentiate between business and residential customers?

Yes .

- a. Are you currently offering any enhanced services? If yes, what are they?

Yes. Voice mail.

- b. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers enered.

Our biggest obstacles seem to be the working relationship with Verizon and Sprint ILECs. As they do not appear to be very concerned about a 271 bid, they are also not very responsive to requests and issues, such as interconnection, LNP, UNE loop installations, and UNE loop repair which many times are customer-affecting.

- c. Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.

Again, With Verizon and Sprint, we find that they disregard aspects of the interconnection agreement in the areas of repair and Maintenance. Further, Verizon often requires our company to install plant 9 grounding wires, fire retardant backboards in order for Verizon to agree to put a T-1 in place to the customer. Quite often these requests are expensive and not covered by the Interconnection agreement, but they demand them of our company prior to handling an order.

- d. Do you 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?

Our company is a switch-based, leased facilities Integrated Communications Provider, providing Internet, data, local dial tone, and long distance services to business customers via T1 lines and UNEp. We do not have any plans to change our service methods at this time.

[REDACTED]

- ### Local service/Interexchange/Data

- No

- No**

- No.

12. 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.
- Many of the solutions which have been employed recently to assure that BellSouth is doing what is required of it would also be well suited to force onto Verizon and Sprint. Performance Measurements with payment for bad service for one would be a great start in leveling the playing field with these two ILECs. If they had another "carrot" which created some incentive for the companies to provide wholesale service at true parity with their retail service, then the Florida consumers in their service areas would see many improvements. Further, continuing to hold BellSouth's feet to the fire on Performance Measurements and forcing payments for non-parity will be a major force in keeping them in line to do what is required under the Telecom Act.**
13. If your company filed a Form 477 with the Federal Communications Commission in March 2001, please enclose a copy of the completed Form 477 with your response to this data request.
- Enclosed**
14. Does your company offer xDSL exclusively?
- No.**
15. If the answer to question 15 is "yes," how many xDSL lines in aggregate does your company provide?
- No.**
16. If the answer to question 15 is "yes," in what exchanges in Florida are your services available?
- No.**
17. If the answer to question 15 is "yes," how are your company's various service offerings priced?
- No.**

FCC Form 477 -- Local Competition and Broadband Reporting**Cover Page - Name & Contact Information**

All filers must complete this section.

File data as of: December 31, 2000

1. Filing Status Meet local competition threshold only
2. Company NewSouth Communications Corp.
3. Indicate the category that best describes the operations covered by this filing.
Wireline Local Exchange Carrier
4. Filers must report separate data for ILEC and non-ILEC operations.
Use the following drop-down box to indicate whether this worksheet contains data for ILEC or for non-ILEC operations.
non-ILEC operations
5. Use the following drop-down box to select your company, parent or controlling entity name. Select "not shown" if it is not in the list. See instructions Section IV-B-1 for information on preparing file names.
NewSouth Communication Corp.

If you selected "not shown" above, then provide the following:

- Name of company, parent or controlling entity.
6. State. Florida
 7. Contact person (person who prepared the data contained below).
Lori Reese
 8. Contact person telephone number and e-mail address.
phone 864-672-5177
e-mail lreese@newsouth.com
 9. Indicate whether this is an original or revised filing.
Original Filing
 10. Indicate whether you request non-disclosure of some or all of the information in this file because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.
Filer certifies that some data in this report is privileged and confidential
 11. If you requested non-disclosure in line 10, indicate if this is your complete or redacted file.
Complete version of file

Please review instructions before completing form.

Reminders:

- 1) Virus check your floppy diskettes or compact disk before you mail them.
- 2) Use the correct version of the form. If you are not filing data for December 31, 2000, then obtain the correct version from www.fcc.gov/broadband/data/forms.
- 3) You may not insert or delete columns or rows, move cells, or edit text or numbers outside the cells provided for data entries. Files that cannot be opened in EXCEL97, files whose structure has been altered, and files with improper names will be returned for refiling.
- 4) If you have questions about the form, contact the Common Carrier Bureau, Industry Analysis Division at (202) 418-0940; via e-mail at 477INFO@fcc.gov; or via TTY at (202) 418-0484.
- 5) You must include a Certification statement signed by an officer of your company. A single statement will cover all files included on the diskette.
- 6) If you request non-disclosure of some data, you must file a public version of the form with such information redacted. See Sections IV-B and IV-C of the instructions for information on preparing a redacted file.
- 7) Name your files as specified in section IV.B.1 of the instructions. To assist you, complete this Cover Page to generate an "example" name, below. Replace the character "#" in this example name with a sequence number as specified in the instructions. This number should be "1" unless using "1" would cause you to submit more than one file with the identical file name.

Example: FLA#D00NewSouth Communications Corp. .XLS

OMB NO: 3060-0816

EXPIRATION DATE: 11/30/2003

NewSouth Communications Corp. non-ILEC operations for Florida December 31, 2000

Complete Part I if you and all affiliates (including commonly controlled entities) provide 250 or more broadband lines or wireless channels in the state over your own facilities or over lines you provisioned as broadband. See instructions for definitions of "own facilities", "broadband", "end user", and "residential and small business".

If you provide data in Part I, you must provide in Part V a list containing the 5-digit zip codes of the end-user locations in which you provide the broadband services reported herein. See instructions.

Data as of December 31, 2000

A. Lines and wireless channels of broadband service that you provided over your own facilities, or over UNE loops or other lines and wireless channels that you obtained from other service providers and equipped as broadband, categorized by technology at the end-user location.

- I - 1. Asymmetric xDSL.
- I - 2. Other traditional wireline including symmetric xDSL.
- I - 3. Coaxial carrier systems including hybrid fiber-coaxial systems.
- I - 4. Optical carrier (fiber to the end user).
- I - 5. Satellite.
- I - 6. Terrestrial wireless fixed.
- I - 7. Terrestrial wireless mobile.
- I - 8. All other technologies, such as distribution over electric power lines.

(a) Total one-way and two-way (full) broadband lines and wireless channels	Percentages of lines and wireless channels reported in (a)				
	(b) % of (a) used by residential & small business customers	(c) % of (a) provided over your own facilities	(d) % of (a) provided (i.e. billed directly) to end users	(e) % of (a) providing customers greater than 200 kbps in both directions	(f) % of (a) providing customers greater than 2 mbps in both directions
				100%	

NewSouth Communications Corp. non-ILEC operations for Florida December 31, 2000

Complete Part II if you and all affiliates (including commonly controlled entities) provide 10,000 or more voice-grade equivalent lines or wireless voice-grade equivalent channels used for local exchange or exchange access service in the state. See instructions for definitions of "voice telephone service", "voice-grade equivalent lines", "residential and small business", "owned facilities", "COLO switching centers", and "end users".

If you provide data in Part II, you must provide in Part V a list containing the 5-digit zip codes of the end-user locations in which you provide the wireline or fixed wireless voice grade services reported herein. See instructions.

Data as of December 31, 2000

A. Voice telephone service provided to end users.

II - 1. Total lines and channels you provided to end users.

(a) Total voice-grade equivalent lines and voice-grade equivalent wireless channels in service	Percentages of lines and wireless channels reported in (a)			
	(b) % of (a) used for residential & small business service	(c) % of (a) provided over your own facilities	(d) % of (a) provided over UNE loops	(e) % of (a) in ILEC COLO switching centers
13,497	97%	0%	77%	23%

B. Voice telephone service provided to other communications carriers, categorized by:

II - 2. Lines and channels that you provided under a Total Service Resale arrangement. See instructions.

540	3%	0%		0%
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II - 3. Lines and channels you provided under other resale arrangements, such as resold centrex.

0	0%	0%	0%	0%
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C. UNE loops, special access lines, and those private lines that connect to carriers, categorized by:

II - 4. Lines and channels that you provided under a UNE loop arrangement, where you do not provide switching for the line.

1,165	100%			0%
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II - 5. Lines and channels that you provided under a UNE loop arrangement, where you also provided switching for the line.

0				
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II - 6. Special access lines not provided as broadband and private lines that connect an end-user premises to a telecommunications common carrier and is not provided as broadband.

0				
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D. Total wireline voice-grade equivalent lines & fixed wireless voice-grade equivalent channels in service.

II - 7. Total lines and channels provided. [line II-1+line II-2 + line II-3]

14,037	0%	0%	100%
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Percentage of channels reported in (a), carried over the following types of facilities categorized by the technology used in the part of the line or wireless channel at the end-user location

(f) cable coaxial	(g) wireless	(h) all other including traditional wireline
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OMB NO: 3060-0816

EXPIRATION DATE: 11/30/2003

NewSouth Communications Corp. non-ILEC operations for Florida December 31, 2000

Complete Part III if you and all affiliates (including commonly controlled entities) serve 10,000 or more mobile voice telephony subscribers in the state over your own facilities. See instructions for definitions of "mobile voice telephony subscribers" and "owned facilities".

Data as of December 31, 2000

- A. Mobile voice telephony subscribers in service and served over your own facilities.

(a) Network telephone service: subscribers	(b) Percentage of (a) provided (i.e. billed directly) to end users
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III - 1. Cellular, PCS & other mobile telephony.

NewSouth Communications Corp. non-ILEC operations for Florida December 31, 2000

Space for comments or explanatory notes.

Part	Line	Comment
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NewSouth Communications Corp. non-ILEC operations for Florida December 31, 2000 1

Filers completing Part I or Part II must supply a list of 5-digit Zip Codes in which the filer has at least one customer.
Do not provide customer counts by Zip Code.

Data as of December 31, 2000

V - 1. 5-digit Zip Codes in the state in which you provide service to end-user locations:

	(a) Broadband Service	(b) Wireline & Fixed Wireless Exchange Telephone
1		32073
2		32082
3		32114
4		32118
5		32119
6		32124
7		32168
8		32174
9		32176
10		32202
11		32204
12		32206
13		32207
14		32208
15		32209
16		32210
17		32211
18		32212
19		32216
20		32217
21		32218
22		32219
23		32220
24		32223
25		32224
26		32225
27		32233
28		32236
29		32244
30		32246
31		32250
32		32254
33		32256
34		32257

OMB NO: 3060-0816
EXPIRATION DATE: 11/30/2003