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January 23, 2004

Mrs. Blanca Bayo, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

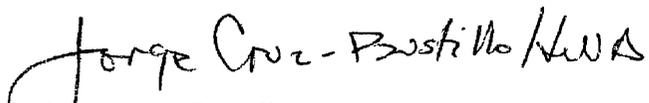
**RE: Docket No. 030851-TP -
SUPRA'S NOTICE OF SERVICE OF RESPONSES TO STAFF'S
SECOND SET OF INTERROGATORIES (NOS. 8-11)**

Dear Mrs. Bayo:

Supra Telecommunications and Information Systems, Inc.'s (Supra) Notice of Service of its Responses to Staff's Second Set of Interrogatories (Nos. 8-11) to be filed in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return it to me.

Sincerely,


Jorge Cruz-Bustillo
Assistant General Counsel

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the following was served via E-mail, Hand Delivery, Facsimile, and/or U.S. Mail this 23rd day of January 2004 to the following:

Jeremy Susac

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By: Jorge Cruz-Bustillo

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)	
from Federal Communications Commission)	Docket No. 030851-TP
Triennial UNE Review: Local Circuit Switching)	
For Mass Market Customers)	Served: January 23, 2004
)	
)	

**SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.'S
RESPONSE TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 8 - 11)**

Supra Telecommunications and Information Systems, Inc., ("Supra"), by and through its undersigned attorney files this Response to the Staff's Second Set of Interrogatories. Supra incorporates by reference all of its general and specific objections filed in this docket with respect to these interrogatories. Any responses provided by Supra in response to this discovery will be provided subject to and without waiving any of Supra's previously filed objections.

INTERROGATORIES:

8. (a) **For all switches that you have provisioned in the State of Florida, please identify from which switches you also have self-provisioned local loops to one or more end users.**

Supra Telecom has not self-provisioned any local loops in any state.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (b) **For those switches identified in response to (a), please identify the capacity of the loops self-provisioned and the number of each loop type provisioned to end users.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (c) **For those loops identified in response to (b), please state the terms, conditions, and rates under which your company is providing the loop in conjunction with the switching component.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (d) **For those switches identified in response to (a), please identify the switch name and its current software release.**

Not Applicable, Supra has no switches meeting the requirements of 8(a).

Notwithstanding that, Supra's Switches are Lucent 7RE / 5ESS-2000 operating software generic 5E15.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (e) **For those switches identified in response to (a), are there any features being offered by the ILEC in the wire centers served by this switch that your switch is incapable of providing?**

Supra Telecom uses 5ESS switches that are capable of providing all of the features and functions of BellSouth's 5ESS switches, for 2 wire POTS service only.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (f) **If the response to (e) is affirmative, please identify what features cannot be provided, what classes of customers use such features, and what actions would be necessary in order to provide these features.**

- 1) Privacy Screening, i.e. like BellSouth Privacy Director Service, used extensively by residential POTS customers.

Implementation would involve contracting for third party service, or expanding the network with the SS7 Service Creation Platform or other similar call flow altering platform, and the deployment of the requisite message handling units, trunk circuits and signaling network changes.

- 2) All of the class of services other than 2 wire POTS.

Implementation would involve capitol expenditure to increase the size and capabilities of the switch(es), additional network equipment, transport interfaces, OSS components for pre-ordering, ordering, provisioning, test and billing, and test and troubleshooting capability.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (g) For those switches identified in response to (a), please identify the anticipated year of retirement.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (h) For those switches identified in response to (a), please describe any existing plans to upgrade the switch's capacity or to implement software upgrades.**

There are plans to implement Privacy Screening features on the switch when possible.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (i) For those switches identified in response to (a), will you provide wholesale switching capacity to another CLEC?**

Supra Telecom does not offer or provide wholesale switching to any other carrier.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (j) If the response to (i) is affirmative, please identify the terms, conditions, and rates you would require of a wholesale customer, including contract terms and take or pay requirements, and state whether your company will ensure that the calling scopes and features that are offered to wholesalers will be the same that the ILEC offers.**

Not Applicable.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (k) If the response to (i) is affirmative, please identify the operational support system interface capabilities, including version number and a copy of the methods and procedures, that your company uses or will use when offering unbundled local switch capability to CLECs in the State of Florida.**

Not applicable. Notwithstanding that, the answer to this question is unknown.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (l) If the response to (i) is affirmative, do you currently provide wholesale switching capacity to another CLEC?**

No.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (m) If the response to (l) is affirmative, please identify to what CLECs you currently provide wholesale switching and the switch used.**

Not Applicable..

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (n) **If the response to (l) is affirmative, please state your company's mean time to repair and other response intervals for servicing existing switches.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (o) **If the response to (i) is affirmative, please state your company's signaling capability and signaling redundancy that will be used in making available unbundled local switching to CLECs in the State of Florida.**

Not Applicable. Notwithstanding that, this question is not clear enough that we can be sure our answer is responsive. Signaling used on any switch serving wholesale unbundled switching **would be** identical to the SS7 signaling used to provide service to the UNE-L customers served by the same switch. The identical physical facilities, redundant paths, redundant carriers, and core SS7 network would be identical.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (p) **If the response to (i) is affirmative, please describe your company's methods and procedures to prevent or minimize service degradation, including but not limited to delay and/or echo return loss attenuation, to a CLEC that utilizes your company's unbundled local switching in Florida.**

Supra Telecom does not provide wholesale unbundled local switching to other carriers. Technical parameters of voice and / or data circuits used on any switch serving wholesale unbundled switching would be identical to the technical parameters used to provide service to the UNE-L customers served by the same switch.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (q) If the response to (i) is affirmative, will your company also make available transport as a stand-alone service to CLECs within the State of Florida?**

Supra Telecom does not own transport facilities and leases what it uses. Supra does not anticipate being a provider of transport.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (r) If the response to (i) is affirmative, will your company make transport available in conjunction with the provision of unbundled local switching capacity to CLEC?**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (s) What is the total available capacity on your company's network to provide transport?**

Supra Telecom's network is operating at full capacity and has no available capacity for resale. See response to (q).

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (t) If the response to (i) is affirmative, under what rates, terms, and conditions are you willing to provide transport in conjunction with the provision of unbundled local switching capacity to CLECs in Florida?**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (u) **For those loops identified in response to (b), please identify, by wire center, the location of such facilities and whether those facilities:**
- (1) **Use fiber to the customer's premises;**
 - (2) **Use coax to the customer's premises;**
 - (3) **Use twisted copper pair to the customer's premises;**
 - (4) **Use fixed wireless technology to the customer's premises.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

9. (a) **For all switches or switching capacity that you have leased to provide service in the state of Florida, please identify from which switches you have self-provisioned local loops to one or more end users.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (b) **For those switches identified in response to (a), please identify the capacity of the loops self-provisioned and the number of each loop type provisioned to end users.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (c) **For those loops identified in response to (b), please state the terms, conditions, and rates under which your company is providing the loop in conjunction with the switching component.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (d) For those switches identified in response to (a), please identify the switch name and its current software release.**

Not Applicable

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (e) For those switches identified in response to (a), are there any features being offered by the ILEC in the wire centers served by this switch that your switch is incapable of providing?**

See Response to Interrogatory 8(f).

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (f) If the response to (e) is affirmative, please identify what features cannot be provided, what classes of customers use such features, and what actions would be necessary in order to provide these features.**

See response to Interrogatory 8(f).

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (g) For those switches identified in response to (a), please identify the anticipated year of retirement.**

Not Applicable.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (h) For those switches identified in response to (a), please describe any existing plans to upgrade the switch's capacity or to implement software upgrades.**

See response to Interrogatory 8(f) and 8(h).

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

10. **(a) Are you aware of any unaffiliated CLECs that either are willing to provide or currently are providing in Florida, wholesale unbundled local switching in combination with unbundled analog loops?**

Not on an unbundled basis. Only on a Total Service Resale basis, with the offering CLEC retaining all access and other third party revenues.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (b) If the response to (a) is affirmative, please identify such companies of which you are aware, and identify in which LATAs and wire centers they offer this combination.**

Not Applicable.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

- (c) If the response to (a) is affirmative, please explain whether or not you believe these entities qualify as wholesale providers, and the basis for your belief.**

Not Applicable. Notwithstanding that, any carrier offering service without tendering the "...exclusive right to all features, functions, and capabilities..." of the underlying network elements cannot be deemed to be offering facilities based service on an unbundled basis under the definitions codified by the *First Report and Order On Local Competition*, cc 96-325.

By existing definitions which have yet to be changed, when a carrier offers service not at TELRIC cost, but at its publically tariffed rate, less a discount,

such service is resale, not unbundled. Similarly when a carrier offers service, regardless of pricing, but retains access charges, reciprocal compensation, End User Common Line charges and other regulatory charges, such service cannot be deemed either switch based, or unbundled. As such this type of service must also be classified resale.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

11. **Please identify in which Florida wire centers you actively market your services, and what services you market in each wire center.**

All BellSouth and Sprint wire centers on a UNE-P basis. Our answer in this regard is unchanged from this year's competition report to the FPSC, which is quite detailed. Essentially business and residential POTS service, with or without, CLASS features, extended area (whole LATA local) flat rate calling plans, voicemail, long distance, and dial-up internet service, Privacy Screening.

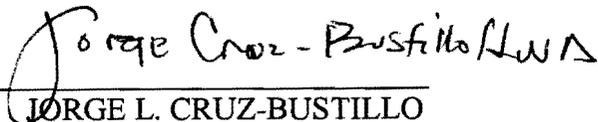
For service provided from Supra switches, Supra currently provides service from 18 wire centers, and offers all of the above features except Privacy Screening.

RESPONSE PROVIDED BY:

David A. Nilson
Vice-President Technology

Respectfully submitted this 23rd day of January 2004.

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