ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers.	Docket No.: 030851-TP Filed: January 27, 2004

JOINT PREHEARING STATEMENT OF THE FCCA, AT&T, COVAD, ITC^DELTACOM, KMC, MCI, NEWSOUTH, SUPRA, XSPEDIUS AND Z-TEL

The Florida Competitive Carriers Association (FCCA), AT&T Communications of the Southern States, LLC (AT&T), DEICA Communications, Inc., d/b/a Covad Communications Company. (Covad), ITC Delta^Com Communciations, Inc., d/b/a ITC^DeltaCom d/b/a Grapevine and BTI Corporation (ITC^DeltaCom), KMC Telecom, III, LLC (KMC), MCImetro Access Transmission Services, LLC and MCI WORLDCOM Communications, Inc. (collectively "MCI"), NewSouth Communications Corp. (NewSouth), Supra Telecommunications & Information Systems, Inc., (Supra), Xspedius Communications, LLC, on behalf of its Florida operating affiliates, Xspedius Management Co. of Jacksonville, LLC (collectively "Xspedius"), and Z-Tel Communications, Inc. (Z-Tel) pursuant to Order No. PSC-03-1054-PCO-TP, issued on September 22, 2003, hereby submit the following Joint Prehearing Statement in the above-captioned docket. [1] For the purposes of this filing, these CLECs comprise the Joint CLECs.

AUS
CAF
CMP
COM 5
CTR
ECR
GCL
OPC
MMS
SEC 1
OTH

[1] Note – MCI takes a separate position on Issues 1, 2(a), 2(b), and 2(c).

1. Witnesses, Subject Matter Issue(s)

The **FCCA** intends to sponsor the testimony of the following witness:

Witness:	Testimony Filed	Issue(s)
1. Joe Gillan	Direct, Rebuttal,	1, 2(a), 2(b), 2(c), 4(a), 5(b)
	Supplemental Rebuttal, Surrebuttal	5(f)

AT&T intends to sponsor the testimony of the following witnesses:

Witnesses:	Testimony Filed	Issue(s)
1. Jay Bradbury	Direct, Rebuttal, Surrebuttal	2(c), 5(c), 5(d), and 5(e)
2. Steve Turner	Direct, Surrebuttal	2(c), 5(c), and 5(d)
3. Mark Van De Water	Direct, Rebuttal, Surrebuttal	3 (all subparts), 5(c), and 6
4. Don Wood	Direct, Rebuttal, Surrebuttal	2 (b),(c) and 5 (all subparts)
5. Cheryl Bursh	Rebuttal, Surrebuttal	5(c)
6. Richard J. Walsh	Surrebuttal	5(c)

MCI intends to sponsor the testimony of the following witnesses:

Witnesses:	Testimony Filed	Issue(s)
1. Dr. Mark Bryant	Direct, Rebuttal, Surrebuttal	1, 2, 5
2. James Webber	Direct, Rebuttal, Surrebuttal	3, 5
3. Sherry Lichtenberg	Direct, Rebuttal, Supplemental Rebuttal, Surrebuttal	3, 5(c), 6

Supra intends to sponsor the testimony of the following witnesses:

Witnesses:	Testimony Filed	Issue(s)
1. David E. Stahly	Direct	1 - 6

2. David A. Nilson	Rebuttal, Surrebuttal	1 – 6
3. Mark Neptune	Rebuttal, Surrebuttal	3 - 6

Z-Tel intends to sponsor the testimony of the following witnesses:

Witness:	Testimony Filed	Issue(s)
1. Michael Reith	Direct	1, 2(a), 2(b), 2(c)

2. Witness Exhibits[2]

FCCA WITNESS EXHIBITS:

Gillan Direct Exhibits

Exhibit No. JPG-1	Experience and Qualifications of Joseph Gillan
Exhibit No. JPG-2	Competitive Profile of UNE-P: BellSouth
Exhibit No. JPG-3	Competitive Growth Profile of UNE-P: BellSouth
Exhibit No. JPG-4	Competitive Profile of UNE-P: Verizon

Gillan Rebuttal Exhibits

Exhibit No. JPG-5	Redefinition of the BEA Economic Areas
Exhibit No. JPG-6	Competitive Profile of UNE-P-BellSouth Territory - Last Six Months
Exhibit No. JPG-7	Distinctions between Mass Market and Enterprise Customers
Exhibit No. JPG-8	State of CLEC Competition
Exhibit No. JPG-9	Preliminary Summary Comparison of Trigger Candidates to Criteria

Gillan Supplemental Rebuttal Exhibits

Exhibit No. JPG-9 (revised)	Preliminary Summary Comparison of Trigger Candidates to Criteria
Exhibit No. JPG-10 (PROPRIETARY)	In-Service Analog UNE Loops Leased by Alleged Self-Provisioning Switch Triggers

AT&T WITNESS EXHIBITS:

Bradbury Direct Exhibits:

Exhibit JMB-1	Graph: The Need for Centralized Switching
Exhibit JMB-2	Graph: The Local Loop

[2] Because the Prehearing Statement is due before the filing of surrebuttal testimony, the Joint CLECs reserve the right to add exhibits filed with their surrebuttal testimony at the time of the Prehearing Conference.

Exhibit JMB-3	Graph: A Distribution Frame
Exhibit JMB-4	Graph: The ILEC network architecture provides efficient call termination.
Exhibit JMB-5	Graph: Collocation and Backhaul
Exhibit JMB-6	Graph: Collocation with ILEC Transport
Exhibit JMB-7	Graph: Collocation with CLEC Backhaul
Exhibit JMB-8	Graph: Collocation Hubbing and Backhaul
Exhibit JMB-9	Graph: Simplified CLEC Loop Network Architecture
Exhibit JMB-10	Graph: The CLEC call termination requirements span multiple ILEC local calling areas, must use the ILEC network and can not duplicate the ILEC call termination efficiencies.

Bradbury Rebuttal Exhibits:

Exhibit JMB-R1	AT&T Supplemental Response to BellSouth Interrogatory No. 1 in Docket NO. 030851-TP
Exhibit JMB-R2	Excerpt from Direct Testimony of David L. Talbot on behalf of AT&T Communications of the Southern States, LLC before the Florida Public Service Commission in Docket 000731-TP, dated November 16, 2000.
Exhibit JMB-R3	Excerpt from Testimony of Christopher Nurse, John Schell and David Talbot on behalf of AT&T Communications of New Jersey, LP, et al, before the New Jersey Board of Public Utilities in Docket No. T0110010893 dated February 25, 2003.

Bradbury Surrebuttal Exhibits:

Exhibit JMB-SR1	Electronic Loop Provisioning (ELP)

Turner Direct Exhibits:

Exhibit SET-1	Resume of Steve Turner
Exhibit SET-2	CD Rom containing Technical Appendix and DS0 Impairment Analysis Tools Exhibit SET-3 SBC Communications, Inc. ("SBC") Ex Parte letter dated January, 2003, to Chairman Powell from James C. Smith, a Senior Vice President of SBC ("SBC Ex Parte").
Exhibit SET-4	Ex Parte letter dated February 4, 2003, from Joan Marsh, AT&T Director of Federal Government Affairs, to Ms. Marlene Dortch, Secretary, Federal Communications Commission in CC Docket Nos. 01-338, 96-98, and 98-147.

Van De Water Direct Exhibits:

Exhibit MDV-1:	BellSouth's Response to AT&T Interrogatory 32
Exhibit MDV-2:	BellSouth's Response to AT&T Interrogatory No. 28
Exhibit MDV-3:	Process Flow Document for a Hot Cut
Exhibit MDV-4:	Hot Cut Video
Exhibit MDV-5	August 30, 2002 Letter
Exhibit MDV-6	BellSouth's Bulk Migration Package
Exhibit MDV-7	June 9, 2003 Letter from Denise Berger (AT&T) to Phillip Cook (BellSouth)
Exhibit MDV-8	Verizon Presentation
Exhibit MDV-9	BellSouth's Response to AT&T Interrogatory No. 8
Exhibit MDV-10	BellSouth pictorial depiction of the central office activities required to implement a hot cut including, pre- and post-cut testing, wiring, coordination, and cut-over of the circuit.
Exhibit MDV-11	BellSouth's Response to AT&T Interrogatory No. 11
Exhibit MDV-12	Bell South's Response to AT&T Interrogatory No. 44
Exhibit MDV-13	December 24, 2002 FCC Ex Parte Letter filed by Robert Blau (BellSouth)
Exhibit MDV-14	BellSouth Response to AT&T Interrogatory No. 1
Exhibit MDV-15	May 5, 2003 Letter from Laurel Mackenzie (BellSouth) to Denise Berger (AT&T)
Exhibit MDV-16	BellSouth Response to AT&T's Request for Production of Documents ("POD") No. 14
Exhibit MDV-17	BellSouth Response to AT&T Interrogatory No. 23
Exhibit MDV-18	BellSouth line splitting arrangements with a D/CLEC providing the splitter, and with BellSouth providing the splitter.
Exhibit MDV-19	Depiction of a UNE-L Line Splitting arrangement using a single DLEC partner.
Exhibit MDV-20	Illustration of the complexity of loop splitting when a CLEC chooses to have business relationships with multiple data providers.
Exhibit MDV-21	July 21, 2003 Letter from Jim Schenk (BellSouth) to Denise Berger (AT&T)Exhibit MDV-22 June 20, 2002 letter from Mr. James M. Schenk (BellSouth) to Mrs. Denise Berger (AT&T)

Van De Water Rebuttal Exhibits:

Exhibit MDV-R1	BellSouth Response to Question re Bulk Migration Collaborative

Exhibit MDV-R2	North Carolina Docket No. P55, Sub 1022, BellSouth Direct Testimony of Keith Milner dated April 12, 2001
Exhibit MDV-R3	BellSouth's Response to AT&T Interrogatory No. 134
Exhibit MDV-R4	BellSouth's Response to AT&T Interrogatory No. 44
Exhibit MDV-R5	BellSouth's Response to AT&T Interrogatory No. 45
Exhibit MDV-R6	BellSouth's Response to AT&T Request for Production of Document No. 40
Exhibit MDV-R7	BellSouth's Response to AT&T Interrogatory No. 137

Van De Water Surrebuttal Exhibits

Exhibit MDV-SR1	BellSouth's September 20, 2002 letter to Denise Berger (AT&T)
Exhibit MDV-SR2	December 11, 2003 BellSouth Line Sharing/Line Splitting Collaborative
Exhibit MDV-SR3	July 30, 2003 e-mail from Denise Berger
Exhibit MDV-SR4	December 19, 2003 letter to Denise Berger

Wood Direct Exhibits

Exhibit DJW-1	Listing of previously testimony filed in Florida and other state proceedings.

Wood Rebuttal Exhibits

Exhibit DJW-R1	Section A3.4, BellSouth General Subscribers Services Tariff
Exhibit DJW-R2	BellSouth UNE Zones
Exhibit DJW-R3	Average Long Distance per Minute Revenues
Exhibit DJW-R4	BellSouth 2002 Annual Report

Wood Surrebuttal Exhibits

Exhibit DJW-SR1	Summary of BACE Model Runs

MCI WITNESS EXHIBITS:

Bryant Direct Exhibits

Exhibit MTB-1	Qualifications and Experience
Exhibit MTB-2	Electronic Analysis Tool (Confidential)
Exhibit MTB-3	Feasibility for MIAMIFLDB

Bryant Rebuttal Exhibits

Exhibit MTB-4	Investment per Customer
Exhibit MTB-5	Retail Trigger Criteria Flowchart
Exhibit MTB-6	CLEC Marketing Information (Confidential)
Exhibit MTB-7	News Article (Confidential)
Exhibit MTB-8	Triggering Companies, BellSouth (Confidential)
Exhibit MTB-9	Triggering Companies, Verizon (Confidential)
Exhibit MTB-10	BACE Sensitivity Test Results
Exhibit MTB-11	BACE Defaults without Filters
Exhibit MTB-12	Model Results with Other Variables

Webber Direct Exhibits

Exhibit JDW-1	Qualifications
Exhibit JDW-2	UNE-L v. UNE-P Growth
Exhibit JDW-3	UNE-P and Total UNE Line Growth (2000-2002) in BellSouth's Service Territory
Exhibit JDW-4	UNE-P to UNE-L Hot Cut
Exhibit JDW-5	Local Voice Network
Exhibit JDW-6	Windows 2000 Server Documentation
Exhibit JDW-7	IDLC Unbundling – Bypass the IDLC System
Exhibit JDW-8	Unbundling a GR-303 IG
Exhibit JDW-9	IDLC Unbundling Using Side Door Port
Exhibit JDW-10	Simplistic EEL

Webber Rebuttal Exhibits

Exhibit JDW-11	Florida Collocation Comparison (Confidential)

Lichtenberg Direct Exhibits

Exhibit SL-1	Retail to UNE-P Migration
Exhibit SL-2	ILEC Retail to CLEC UNE-L Migration
Exhibit SL-3	Retail to UNE-L Migration
Exhibit SL-4	UNE-L Core Migration Scenarios
Exhibit SL-5	BellSouth Change Control E-mail

Lichtenberg Supplemental Rebuttal Exhibit

Exhibit SL-6	MCI Switch Information (Confidential)

SUPRA WITNESS EXHIBITS

Nilson Rebuttal Exhibits

Exhibit DAN-1	BellSouth's Federal Court Testimony

Neptune Rebuttal Exhibits

Exhibit MAK-1	BellSouth's batch hot-cut time line

Z-TEL WITNESS EXHBITS

Reith Direct Exhibits

Exhibit MR-1	Article, "Local Motion"
Exhibit MR-2	Announcement: High Tech Ranking
Exhibit MR-3	Z-Line PVA: Member's Guide
Exhibit MR-4	Announcement: Best New Technology award
Exhibit MR-5	Announcement: Expanded Business Services
Exhibit MR-6	Announcement/Description of "Operation Connect" service
Exhibit MR-7	Excerpt, 10Q

3. Joint CLEC Basic Position Statement

The Florida Public Service Commission should maintain the FCC's national finding that competitive local exchange carriers (CLECs) are impaired without access to unbundled local switching (ULS). CLECs have the incentive to provide mass market service over their own networks wherever they can, but they have not done so on any scale and cannot do so because of the economic and operational barriers they face. UNE-P, of which ULS is a component, is the only entrance strategy that currently has the scope and scale essential to effective competition. To restrict the availability of ULS on the basis of arbitrary or artificial geographic distinctions would eliminate the basis for innovation and competition by CLECs that is just beginning to be realized.

In contrast, BellSouth and Verizon lack incentive to remove barriers to CLEC switch-based competition because doing so would reduce their revenue and enable CLECs to compete and innovate more effectively. The RBOCs gained long distance authority based on opening the local market to competition, which has begun to occur because of the use of UNE-P. Now that BellSouth and Verizon offer long distance service and are rapidly gaining market share, they seek to virtually eliminate local competition for the mass market by eliminating UNE-P, despite the express directive of the Florida Legislature, and the 271 obligation for BellSouth. In exchange for the

opportunity to have their profits deregulated, the Florida Legislature requires that the ILECs must unbundle every part of their local network, so long as it is technically and economically feasible to do so. For BellSouth, it has voluntarily accepted, under the terms of Section 271's social contract, the obligation to offer ULS at rates that are "just and reasonable and nondiscriminatory" and which provides entrants "meaningful access."

The trigger analysis will reveal that economic and operational barriers have not been removed. The mere existence of CLEC-deployed switches in a market is not enough to meet the trigger. CLECs must be actively using their switches in a manner that demonstrates that they are not impaired without ULS. The ILECs have failed to demonstrate in any Florida market that there are three or more CLECs, not affiliated with each other or the ILEC, that are *actively* providing voice analog service to mass market consumers, including residential consumers, with their own switches and ILEC loops, at a level that demonstrates that new entrants in that market have surmounted barriers to entry.

Analysis of potential deployment also demonstrates that economic and operational barriers exist that prevent CLEC switch-based competition from emerging for Florida mass market customers. CLEC testimony demonstrates that even if operational impairment were removed, significant economic impairment would remain that would prevent CLECs from successfully entering the Florida mass market using UNE-L. BellSouth's testimony to the contrary is based (among other things) on improper market definition; overly rosy assumptions about CLECs' costs and revenues; and flaws in the BACE model. CLEC testimony demonstrates that significant operational impairment remains, arising from (among other things) the complex and manual nature of BellSouth's hot cut process; the prevalence of IDLC in BellSouth's network and the inadequate processes for migrating customers on IDLC loops; the utter lack of evidence that BellSouth's systems can handle mass market volumes of UNE-L loop cutovers; and the need for the entire industry to process migrations to and from all carriers in a variety of scenarios. Until BellSouth and the rest of the industry can migrate customers as seamlessly and efficiently as is done today for long distance and UNE-P customers, impairment will continue to exist. Rolling access to UNE-P would not remove this impairment because, for example, BellSouth's batch hot cut process in reality is only a batch ordering process; it does not provide for the seamless migration of mass market volumes of customers; and it only deals with migrations from the ILEC to a CLEC and not other situations.

Although Verizon's batch cut process has improvements that BellSouth has not adopted, Verizon's process still does not satisfy the FCC's requirement of a seamless, low-cost method for transferring large volumes of mass market customers as promptly and efficiently as ILECs can transfer customers using ULS.

Therefore, the Commission should reject the ILECs' requests that it find that the FCC's national findings of impairment without access to unbundled switching for the mass market have been overcome in Florida geographic markets.

4. Questions of Fact, Positions and Witnesses addressing issues

ISSUE 1: For purposes of this proceeding, what are the relevant markets for purposes of evaluating mass market impairment and how are they defined?

JOINT CLEC POSITION: In testing any suggested market definition, the Commission should assure itself that each wire center in the suggested market will have facilities-based (UNE-L) competition at a level commensurate with that currently provided by unbundled switching (UNE-P). The Commission should adopt the Local Access and Transport Area (LATA) market definition, which is consistent with the factors considered significant by the FCC[3] because each LATA, on a more granular level, is comparable to the current state-wide mass market competition profile, and is large enough to afford economies of scale to CLECs and competitive choice to rural, urban and suburban customers. Such economies of scale are essential to, among other things, the ability of CLECs to offer ubiquitous service and distribute specialized services. In addition, LATA boundaries are well understood, conform to wire center boundaries, and have defined Florida's "exchange markets" for the past two decades.

MCI POSITION: The relevant market is the wire center, generally because (a) CLECs must invest on a wire-center-by-wire center basis; (b) a number of factors such as loop cost, collocation cost, number of customers, and customer demographics vary by wire center; and (c) using a larger area could involve offsetting unprofitable areas with profitable areas, thus removing ULS were it is still needed.

ISSUE 2: In defining the relevant geographic areas to include in each of the markets, how should the following factors be taken into consideration and what relative weights should they be assigned:

a) the locations of mass market customers actually being served by CLECs;

b) the variation in factors affecting CLECs' ability to serve each group of customers; and

c) CLECs' ability to target and serve specific markets profitably and efficiently using currently available technologies?

2(a) the locations of mass market customers actually being served by CLECs;

JOINT CLEC POSITION: The competitive profile of UNE-P clearly demonstrates that the locations of customers actually being served (if any) by competitors is in fact, the entire territory of the incumbent. However, the ability to accept customers at all

[3] See *FCC Triennial Review Order ("TRO")* ¶ 495 & 496.

locations, regardless of geographic distinctions, is dependent upon a broadly defined market in which service to less profitable customers can be offset by service to more profitable areas. The location of all mass market customers actually served by CLECs, using UNE-P as well as UNE-L, is crucial to defining the relevant geographic markets because, in testing competitive entry strategies, the Commission should measure whether they will produce the same level of competitive choice currently provided to Florida consumers.

MCI POSITION: Telecommunications services are location specific, meaning that customers demand that services be delivered to their premises, and that substitutes that do not meet this criterion will be judged unsatisfactory. Customer locations can be aggregated for purposes of achieving administrative practicability and economies of scale and scope. Such an aggregation at the wire center level achieves both of these goals while preserving much of the accuracy of customer-by-customer analysis.

2(b) the variation in factors affecting CLECs' ability to serve each group of customers; and

JOINT CLEC POSITION: Within each proposed geographic area, the Commission should consider market-specific data on, including but not limited to: (1) the size, location, customer-served count, and customer-service profile of each wire center; (2) the existence of facilities-based competition or collocations in each wire center; (3) the current retail rates, costs, and the likelihood that rates will change over time; (4) the availability of sufficient collocation space and cost-effective backhaul facilities; (5) the ability to handle change in phone traffic patterns without call blocking if UNE-P is eliminated; and (6) the actual experience and ability of the ILECs to handle the large volume of hot cuts needed if UNE-P is eliminated.

MCI POSITION: A number of factors vary by wire center, including but not limited to: (a) the number of customers served by the wire center; (b) the number of lines over which the CLEC may offer DSL services; (c) the number of lines served by DLC; (d) the proportion of business and residential customers; (e) the demographics of the customers served; (f) the demographics of customers served; (g) the cost of transport; and 8) the cost of loops.

2(c) CLECs' ability to target and serve specific markets profitably and efficiently using currently available technologies?

JOINT CLEC POSITION: Geographic markets should be defined in a manner that avoids geographic "dead zones," which would leave some consumers with no competitive choice, and that allows CLECs to target and serve efficiently each segment of retail mass market customers, including, but not limited to: those whose loops are currently served with Integrated Digital Loop Carrier (IDLC) systems; Digital Subscriber Line (DSL)-only customers; customers receiving bundled voice and data services

provided through line-splitting arrangements; and customers of other CLECs. Further, the broad availability of UNE-P is essential for, among other things, providing the cost-effective distribution channels necessary to enable CLECs to offer those innovative services that entail expensive up-front investments.

MCI POSITION: Markets should not extend beyond individual wire centers. Service in one part of the market should impley that the carrier may serve all parts of the market, but the ability to apply service profitably in one wire center does not imply that ability in another. Moreover, using a larger geographic area may average profitable and unprofitable areas, inaccurately portraying CLECs' ability to serve the entire area. Economies of scale will not prompt CLECs to invest in wire centers where service cannot be provided profitably.

ISSUE 3: Batch cut process (§51.319(d)(2)(ii))

(a) Does a batch cut process exist that satisfies the FCC's requirements in the Triennial Review Order? If not, in which markets should the Commission establish a batch cut process?

(b) For those markets where a batch cut process should be established, what volume of loops should be included in the batch?

(c) For those markets where a batch cut process should be established, what specific processes should be employed to perform the batch cut?

(d) For those markets where a batch cut process should be established, is the ILEC capable of migrating multiple lines that are served using unbundled local circuit switching to CLECs' switches in a timely manner?

(e) For those markets where a batch cut process should be established, should the Commission establish an average completion interval performance metric for the provision of high volumes of loops?

(f) For those markets where a batch cut process should be established, what rates should be established for performing the batch cut processes?

(g) Are there any markets in which a batch hot cut process need not be implemented? If so, for those markets where a batch cut process need not be established because absence of such a process is not impairing CLECs' ability to serve end users using DS0 loops to serve mass market customers without access to unbundled local circuit switching,

(i) what volume of unbundled loop migrations can be anticipated if CLECs no longer have access to unbundled local circuit switching;

(ii) how able is the ILEC to meet anticipated loop migration demand with its existing processes in a timely and efficient manner; and

(iii) what are the nonrecurring costs associated with the ILEC's existing hot cut process?

3(a) Does a batch cut process exist that satisfies the FCC's requirement in the TRO? If not, in which markets should the Commission establish a batch cut process?

JOINT CLEC POSITION: No batch cut process exists that (1) satisfies the TRO requirement of a seamless, low-cost method for transferring large volumes of mass market customers "as promptly and efficiently as ILECs can transfer customers using unbundled switching"[4] or (2) is comparable to the long distance market in which long distance carriers transfer new mass market customers at a very low cost, in very high volumes, and in short periods of time, using the automated Primary Interexchange Carrier ("PIC") change process. Customers today expect to be able to move from carrier to carrier seamlessly. Operational problems will affect customers, through provisioning delays, service problems, and even loss of dial tone. Customers will not stand for these problems, and if they are not resolved, ultimately will undermine local competition.

Indeed, BellSouth provides only batch ordering with individual hot cuts; it has no true batch cut process that includes the batch provisioning of loops. As long as the batch cut process is based on manual provisioning procedures, it should be viewed as an interim solution with limited opportunities for improvement over current hot cut processes. As such, the batch cut process resulting from this docket should be viewed as an important step toward the ultimate development of an electronic solution that creates the same opportunity for local competition that exists for mass market consumers in the long distance market. A batch cut process should be established for use in every market, absent detailed findings that hot cuts do not give rise to impairment in a particular market, and the ILECs have produced no data to support such findings.[5]

3(b) For those markets where a batch cut process should be established, what volume of loops should be included in the batch?

JOINT CLEC POSITION: The batch size must permit the CLEC and ILEC to achieve cost efficiencies, so that the cost per line and the amount of time required to provision UNE-L customers are equivalent to the experience of changing carriers under UNE-P or

[4] *Id.* ¶ 512, n.1574.
[5] *Id.* ¶ 488.

changing long distance carriers. Batches should be sized to accommodate efficient transfers in a truly competitive market in which UNE-P is not available.

3(c) For those markets where a batch cut process should be established, what specific processes should be employed to perform the batch cut?

JOINT CLEC POSITION: Any batch cut process must operate in conjunction with, and provide for the same prompt and efficient customer loop transfer as, the existing UNE-P electronic customer acquisition process, and should include all mass market customers (residential and small business), all types of loops used to serve such customers, and all types of transfers between and among CLECs and ILECs.[6]

3(d) For those markets where a batch cut process should be established, is the ILEC capable of migrating multiple lines that are served using unbundled local circuit switching to CLECs' switches in a timely manner?

JOINT CLEC POSITION: No; both ILEC proposals for migration of the embedded UNE-P base rest on bare promises, untested procedures and faulty assumptions, and, even so, are far from timely and efficient.

3(e) For those markets where a batch cut process should be established, should the Commission establish an average completion interval performance metric for the provision of high volumes of loops?

JOINT CLEC POSITION: Yes. These metrics should be equivalent to those for transferring customers using UNE-P and comparable to intervals for transferring mass market long distance customers. The existing measurement of each activity at the most granular level feasible should continue, and the percentage of service outages and corresponding recovery time, and percentages of batches started and completed on time, should be included. Benchmarks should be revised and established to drive performance that protects customers, with self-executing financial consequences for an ILEC's failure to meet relevant standards, such as a service outage penalty equal to *average net revenues* x *life of customer.*

3(f) For those markets where a batch cut process should be established, what rates should be established for performing the batch cut processes?

JOINT CLEC POSITION: TELRIC rates should be established, and they should be comparable to rates provided to ILECs seeking to compete in the long distance market. To avoid economic and operational impairment, an ILEC's batch cut process must meet the needs of the competitive mass market for local services commensurate with the scale achieved in the long distance market, as all carriers compete in the mass market with bundled long distance and local service offerings.

---

[6] *Id.* ¶¶ 512, n.1574; 514.

3(g) Are there any markets in which a batch hot cut process need not be implemented?

JOINT CLEC POSITION: No.

If so, for those markets where a batch cut process need not be established because absence of such a process is not impairing CLECs' ability to serve end users using DS0 loops to serve mass market customers without access to unbundled local circuit switching,

(i) what volume of unbundled loop migrations can be anticipated if CLECs no longer have access to unbundled local circuit switching;

JOINT CLEC POSITION: In the long distance market, which represents the local competition level sought by regulators, approximately 25% of all customer lines change carriers annually. Using this experience and BellSouth's current level of Florida POTs lines, BellSouth should expect to have 123,958 line-change requests per month, or 5,635 hot cuts per business day.

(ii) how able is the ILEC to meet anticipated loop migration demand with its existing processes in a timely and efficient manner; and

JOINT CLEC POSITION: The ILECs' reliance on prior approvals in section 271 proceedings and future promises is misplaced and contrary to TRO requirements.[7] For example, anticipated loop migration demand for BellSouth of 5,635 hot cuts each business day exceeds, on a daily basis, the total number BellSouth currently performs over a three-month period. Moreover, given the time-consuming, predominantly manual nature of the entire hot cut process, BellSouth cannot meet even the lower, current loop migration demand as efficiently as it transfers customers using unbundled switching: For the most prevalent loop categories ordered in a UNE-L environment, its order completion interval is five to ten times longer than UNE-P, and it consistently fails to meet performance metrics for completing the order process as well.

(iii) what are the nonrecurring costs associated with the ILEC's existing hot cut process?

JOINT CLEC POSITION: For the most prevalent loop categories ordered in a UNE-L environment for mass market customers, BellSouth today charges a nonrecurring fee of $83.11, and Verizon charges $121.98 for a hot cut.

[7] *TRO* ¶ 469.

ISSUE 4:

(a) In which markets are there three or more CLECs not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, serving mass market customers with their own switches?

(b) In which markets are there two or more CLECs not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, who have their own switches and are offering wholesale local switching to customers serving DS0 capacity loops in that market?

4(a) In which markets are there three or more CLECs not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, serving mass market customers with their own switches?

JOINT CLEC POSITION: None. The Commission should review claims of "actual deployment through triggers," in a manner such that UNE-P competition is eliminated only from those markets where UNE-L alone will continue to provide the same level of competition currently enjoyed by Florida customers. This test is not met here, because the ILECs have failed to demonstrate that there are three or more unaffiliated CLECs "actively providing voice service to mass market customers"[8] in accordance with the criteria discussed in the TRO.

4(b) In which markets are there two or more CLECs not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to that of the ILEC, who have their own switches and are offering wholesale local switching to customers serving DS0 capacity loops in that market?

JOINT CLEC POSITION: None. There are no CLECs offering wholesale local switching to mass market customers. Further, neither BellSouth nor Verizon has alleged any whole trigger has been met. The Commission should maintain the FCC's national finding that CLECs are impaired without access to ULS.

ISSUE 5:

(a) In which markets are there either two wholesale providers or three self- provisioners of local switching not affiliated with each other or the ILEC, serving end users using DS1 or higher capacity loops?

[8] *Id.* ¶ 499.

Where there are, can these switches be used to serve DS0 capacity loops in an economic fashion?

(b) **In which markets are there any carriers with a self-provisioned switch, including an intermodal provider of service comparable in quality to that of the ILEC, serving end users using DS0 capacity loops?**

(c) **In which markets do any of the following potential operational barriers render CLEC entry uneconomic absent access to unbundled local circuit switching:**

1. **The ILEC's performance in provisioning loops;**

2. **difficulties in obtaining collocation space due to lack of space or delays in provisioning by the ILEC; or**

3. **difficulties in obtaining cross-connects in the ILEC's wire centers?**

(d) **In which markets do any of the following potential economic barriers render CLEC entry uneconomic absent access to unbundled local circuit switching:**

1. **the costs of migrating ILEC loops to CLECs' switches;**

or

2. **the costs of backhauling voice circuits to CLECs' switches from the end offices serving the CLECs' end users?**

(e) **Taking into consideration the factors in (a) through (d), in what markets is it economic for CLECs to self-provision local switching and CLECs are thus not impaired without access to unbundled local circuit switching?**

(f) **For each market, what is the appropriate cut-off for multiline DS0 customers (where it is economic to serve a multiline customer with a DS1 loop)? That is, taking into account the point at which the increased revenue opportunity at a single location is sufficient to overcome impairment and the point at which multiline end users could be served economically by higher capacity loops and a CLEC's own switching (and thus be considered part of the DS1 enterprise market), what is the maximum number of DS0 loops that a CLEC can serve using unbundled local switching, when serving multiline end users at a single location?**

5(a) *In which markets are there either two wholesale providers or three self-provisioners of local switching not affiliated with each other or the ILEC, serving end users using DS1 or higher capacity loops? Where there are, can these switches be used to serve DS0 capacity loops in an economic fashion?*

JOINT CLEC POSITION: None. To the extent that CLECs are serving the enterprise market with their own switches, these switches cannot be used to serve the mass market in an economic fashion. The operational and economic barriers to entering the mass market with self-provisioned switches are so high that CLECs choose not to use excess capacity on their enterprise switches to serve the mass market, even though they have every incentive to recover more quickly the fixed costs associated with their switches by spreading these costs over a broader base of customers.

5(b) *In which markets are there any carriers with a self-provisioned switch, including an intermodal provider of service comparable in quality to that of the ILEC, serving end users using DS0 capacity loops?*

JOINT CLEC POSITION: None. The ILECs have failed to establish that any carriers are using their own switches to provide POTs service to the mass market in the manner envisioned by the FCC.

5(c) *In which markets do any of the following potential operational barriers render CLEC entry uneconomic absent access to unbundled local circuit switching:*

1. The ILEC's performance in provisioning loops;

JOINT CLEC POSITION: All. Due to the physical structure of the ILEC network, as well as the manual nature of the hot cut process, operational barriers not faced by the ILEC render CLEC entry uneconomic for mass market competition in each geographic market. These processes will not hold up if order volumes increase exponentially, as they would if carriers moved from UNE-P to UNE-L. Because ILEC switches are located at the point where an aggregate number of local loops terminate, the ILEC need only secure a single jumper pair to connect the local ILEC analog loop to its switch. In contrast, an efficient CLEC cannot locate its switch in the location where ILEC local loops terminate, but must aggregate traffic from many such locations to its switch, which is always remotely located from the ILEC office where the loops terminate. Thus, even in the current market, where virtually all mass market consumers are served via UNE-P, the ILEC's use of the manual hot cut performance for provisioning loops results in significant operational impairments in every market in Florida. Not only are BellSouth's UNE-L provisioning systems manual, but its UNE-L ordering systems involve a great deal of manual processing as well. Moreover, hot cuts are more complicated for loops with IDLC feeder, because BellSouth currently requires facilities changes to accommodate such migrations. Further, although BellSouth proposes to make EEL-

based loops available, they are not available as a practical matter, nor has BellSouth documented how they are to be ordered and provisioned. For EELs to be practical, concentration must be provided.

Although the economic impairment resulting from these barriers may be reduced somewhat, the *existence* of these operational barriers does not vary among the Florida markets. In addition, if UNE-P is eliminated, CLEC mass market phone traffic will no longer travel on the direct trunks within the ILEC transport network, but will shift to CLEC switches and be connected only through the ILEC tandem switches. Therefore, an efficient CLEC in each geographic market will face the additional operational barrier of "call blocking" because the trunks leading to and from the tandem switches become overloaded, resulting in consumer frustration with increased "fast busy" signals or the inability to make phone calls efficiently.

2. *difficulties in obtaining collocation space due to lack of space or delays in provisioning by the ILEC; or*

JOINT CLEC POSITION: All. Physical collocation space presents operational barriers to CLEC facilities-based competition. The ILECs have failed to provide detailed information on physical collocation or hot cut working space in each central office, or on the number of new or expanded collocations that will be required to service CLEC customers at each center if UNE-P is not available.

3. *difficulties in obtaining cross-connects in the ILEC's wire centers?*

JOINT CLEC POSITION: All. The challenging ILECs' failure in any geographic market "to provide cross-connections between the facilities of two CLECs on a timely basis,"[9] results in operational barriers and impairment. Although the ILECs, such as BellSouth, do *allow* for cross-connects, they do not *provide* them as required by the TRO, resulting in impairment.

5(d) In which markets do any of the following potential economic barriers render CLEC entry uneconomic absent access to unbundled local circuit switching:

1. *the costs of migrating ILEC loops to CLECs' switches; or*
2. *the costs of backhauling voice circuits to CLECs' switches from the end offices serving the CLECs' end users?*

JOINT CLEC POSITION: All. An efficient CLEC suffers absolute cost disadvantages, conservatively ranging from a high of $19.74 per line per month to a low of $11.86 per line per month. These cost disadvantages include both the "hot cut" costs of migrating ILEC loops to CLEC switches and the "backhaul infrastructure" costs of backhauling voice circuits to CLECs' switches from the ILEC offices serving the

[9] *Id.* ¶ 514.

CLECs' end users, and result from the operational barriers described Issue 3(c)(1). Moreover, analysis of all related costs and revenues that CLECs reasonably could be expected to realize further demonstrates that CLECs cannot use a UNE-L strategy to serve mass market customers in any Florida geographic market.

5(e) Taking into consideration the factors in (a) through (d), in what markets is it economic for CLECs to self-provision local switching and CLECs are thus not impaired without access to unbundled local circuit switching?

JOINT CLEC POSITION: None. To date, UNE-P has provided the only viable path for CLECs to enter local mass market competition, and the ILECs themselves have not entered the market this way by deploying competitive switches to serve mass market customers in each other's regions. Given the operational and economic barriers that exist today for UNE-L entry, CLECs are impaired without access to ULS in all markets.

5(f) For each market, what is the appropriate cut-off for multiline DS0 customers (where it is economic to serve a multiline customer with a DS1 loop)? That is, taking into account the point at which the increased revenue opportunity at a single location is sufficient to overcome impairment and the point at which multiline end users could be served economically by higher capacity loops and a CLEC's own switching (and thus be considered part of the DS1 enterprise market), what is the maximum number of DS0 loops that a CLEC can serve using unbundled local switching, when serving multiline end users at a single location?

JOINT CLEC POSITION: For BellSouth's territory, a cross-over of 12 lines, as suggested by Sprint, should be used. It reflects a reasonable estimate of the point where the costs to a customer of a UNE DS1 are less than continued use of multiple UNE analog loops for voice service. For Verizon's territory, the Commission should accept Verizon's proposal to not impose an artificial upper band to the mass market.

ISSUE 6: If the triggers in §51.319(d)(2)(iii)(A) have not been satisfied for a given ILEC market and the economic and operational analysis described in §51.319(d)(2)(iii)(B) resulted in a finding that CLECs are impaired in that market absent access to unbundled local switching, would the CLECs' impairment be cured if unbundled local switching were only made available for a transitional period of 90 days or more? If so, what should be the duration of the transitional period?

JOINT CLEC POSITION: No, the CLECs' impairment would not be cured. Temporary or "rolling" access to unbundled local switching would not remove most operational and economic barriers because it would rely on the ILECs' batch ordering process, and would suffer from the same infirmities. Moreover, rolling access does not solve the problem of how to migrate customers once they have moved to a CLEC.

Operational and economic barriers include, but are not limited to: (1) collocation, digitization, concentration and backhaul requirements to connect the ILEC analog loop to a CLEC switch; (2) service outages caused by hot cuts; (3) inefficiencies and errors caused by manual hot cut provisioning; (4) capacity constraints created by the volume of hot cuts required; (5) lack of access to significant segments of the mass market, including IDLC customers, DSL-only customers, customers receiving bundled voice and data services provided through line-splitting arrangements, and customers of other CLECs; and (6) capacity constraints on the trunks leading to and from the ILEC tandem switches.

Should the Commission establish temporary or rolling access to UNE-P, it should provide for customer acquisition of all ILEC features at TELRIC rates; there should be sufficient time for CLECs to accumulate enough customers to justify collocation and then to establish collocation in new central offices; and the amount of time customers may remain in "UNE-P acquisition" mode should be subject to adjustment, based on the CLEC's need to acquire collocation and backhaul equipment and the ILEC's ability to meet performance and service standards for migrations.

5. Questions of Law

There are no questions of law at this time.

6. Questions of Policy

There are no questions of policy at this time.

7. Stipulated Issues

There are no stipulated issues at this time.

8. Pending Motions

a) FCCA's Request for Representation by a Qualified Representative, Bill Magness. (Filed December 8, 2003).

b) FCCA's Motion Requesting Leave to File the Supplemental Rebuttal Testimony and Exhibits of Joe Gillan. (Filed Jan. 22, 2004)

c) MCI's Motion to Accept Supplemental Rebuttal Testimony and Exhibits of MCI Witness Lichtenberg. (Filed Jan. 22, 2004)

d) AT&T's Request for Representation by Qualified Representatives, Tami Azorsky, Suzy Ockleberry, Martha Ross-Bain, Lori Reese.

e) Z-Tel has no pending motions. Z-Tel filed a response in opposition to BellSouth's Motion to Strike the testimony of Z-Tel witness Michael Reith.

9. Pending Requests or Claims for Confidentiality

All testimony and discovery which is to be considered confidential has been so marked upon its filing with this Commission. (See Attachment A).

10. Other requirements

There are no other requirements at this time.

11. Objections to witness qualifications

There are no objections to witness qualifications at this time.

ATTACHMENT A
LIST OF JOINT CLEC CLAIMS OF CONFIDENTIALITY

FCCA

Date Filed	Testimony
January 7, 2004	Rebuttal Testimony and Exhibits of Joseph Gillan
January 22, 2004	Information contained in supplemental rebuttal testimony and exhibits of Joseph Gillan

AT&T

Responses to Discovery	Date Filed
Responses to BST ROG-1	November 4, 2003
Supplemental Responses to BST ROG-1	November 25, 2003
Responses to TRO Data Request	December 3, 2003
Responses to BST ROG-3	December 9, 2003
2nd Supplemental Responses to BST ROG-1	December 10, 2003
Responses to Staff ROG-1	December 12, 2003
Responses to Staff ROG-2	December 31, 2003
3rd Supplemental Responses to BST ROG-1.	January 20, 2004
Supplemental Responses to Staff ROG-2	January 20, 2004
Responses to BST ROG-5	January 22, 2004
Testimony	
Direct Testimony of Mark Van de Water	December 4, 2003
Rebuttal Testimony of Jay Bradbury and Mark Van de Water	January 7, 2004

COVAD

Date Filed	Responses to Discovery
October 30, 2003	Response and objections to bellSouth's 1st request for PODs and 1st set of interrogatories. Confidential information in response to interrogatory numbers 1 and 2(a,b,d, and e).
December 3, 2003	Responses to 2003 TRO data request.
December 11, 2003	Responses to staff's 1st request for production of documents. (No. 3).
January 22, 2004	Bates-stamped copy of identical response to staff's 1st request for PODs (No. 3) originally filed on 12/11/03.

ITC^DELTACOM

Date Filed	CLAIMS OF CONFIDENTIALITY FOR ITC^DELTACOM'S DISCOVERY RESPONSES
10/30/2003	Response to BellSouth's 1st Set of Interrogatories
12/11/2003	Response to Staff Data Requests (030851 & 030852)
12/18/2003	Response to Staff's 1st Set of Interrogatories (Nos. 1-7) and 1st Request for Production of Documents (Nos. 1-8)
12/29/2003	Response to Staff's 2nd Set of Interrogatories

KMC

Date Filed	CLAIMS OF CONFIDENTIALITY FOR KMC'S DISCOVERY RESPONSES
11/19/2003	Responses to BellSouth's 1st Set of Interrogatories
12/19/2003	Response to Staff Data Requests (030851 & 030852)

MCI

Date Filed	CLAIMS OF CONFIDENTIALTY FOR MCI'S DISCOVERY RESPONSES
10/30/2003	Responses and Objections to BellSouth's 1st Set of Interrogatories and 1st Request for Production of Documents
11/24/2003	Supplemental Responses to BellSouth's 1st Set of Interrogatories (Nos. 6-7)
1/6/2004	Response to Staff's 2nd Set of Interrogatories
Date Filed	**CLAIMS OF CONFIDENTIALITY FOR MCI TESTIMONIES**
12/4/2003	Direct Testimony (and Exhibits) of Mark T. Bryant
12/4/2003	Direct Testimony of James D. Webber
1/7/2004	Rebuttal Testimony and Exhibits of Mark T. Bryant
1/7/2004	Rebuttal Testimony (and Exhibit) of James D. Webber
1/23/2004	Supplemental Rebuttal Testimony (and Exhibits) of Sherry Lichtenberg

NEWSOUTH

Date Filed	Discovery Responses
December 10, 2003	(a) Highlighted language in NewSouth's Responses to BellSouth's First Set of Interrogatories in Docket No. 030851-TP (b) Confidential attachments 1 through 9 to NewSouth's

	Responses to BellSouth's First Set of Interrogatories in Docket No. 030851-TP

SUPRA

Request for Confidential Classification for certain information contained in Supra's responses to BellSouth's discovery dated October 13, 2003.

XSPEDIUS

Date Filed	**Discovery Responses**
November 12, 2003	Responses and Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents
December 11, 2003	Regionwide Responses and Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents

Z-TEL

None at this time.

Tracy Hatch /JAM
Tracy Hatch
AT&T Communications of the Southern States, LLC
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301
(850) 425-6360 Telephone
(850) 425-6361 Telefax

Attorney for AT&T of the Southern States, LLC

Joseph A. McGlothlin
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Attorneys for the Florida Competitive Carriers Association

Vicki Gordon Kaufman
Charles (Gene) Watkins
Covad Communications Co.
1230 Peachtree Street, NE
19th Floor
Atlanta, Georgia 30309
(404) 942-3492 Telephone
(404) 942-3495 Telefax

Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Attorneys for DIECA Communications, Inc. d/b/a Covad Communications Co.

Floyd Self /JAM
Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802
(256) 382-3856 Telephone
(256) 382-3936 Telefax

Floyd Self
Messer Caparello & Self
215 South Monroe Street
Suite 701
Tallahassee, Florida
(850) 222-0720 Telephone
(850) 224-4359 Telefax

Attorneys for ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom

Floyd Self /JAM

Floyd Self
Messer Caparello & Self
215 South Monroe Street
Suite 701
Tallahassee, Florida
(850) 222-0720 Telephone
(850) 224-4359 Telefax

Attorneys for KMC Telecom, III, LLC

Floyd Self /JAM

Floyd Self
Messer Caparello & Self
215 South Monroe Street
Suite 701
Tallahassee, Florida 32302-1876
(850) 222-0720 Telephone
(850) 224-4359 Telefax

Donna Canzano McNulty
MCI WorldCom
1203 Governors Square Boulevard
Suite 201
Tallahassee, Florida 32301
(850) 219-1008 Telephone
(850) 219-1018 Telefax

Dulaney O'Roark, III
MCI WorldCom
6 Concourse Parkway, Suite 600
Atlanta, Georgia 30328
(770) 284-5498 Telephone
(770) 284-5488 Telefax

Attorneys for MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.

Jon C. Moyle, Jr. /JAM

Jon C. Moyle, Jr.
Moyle Flanigan Katz Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, Florida 32301
(860) 681-3828 Telephone
(850) 681-8788 Telefax

Attorneys for NewSouth Communications Corp.

Jorge Cruz-Bustillo /JAM

Jorge Cruz-Bustillo
Supra Telecommunications and Information Systems, Inc.
2620 SW 27th Avenue
Miami, Florida 33133
(305) 476-4252 Telephone
(305) 443-1078 Telefax

Attorneys for Supra Telecommunications and Information Systems, Inc.

Norman H. Horton, Jr. /JAM

Norman H. Horton, Jr.
Messer Caparello & Self
215 South Monroe Street, Suite701
Tallahassee, Florida 32302-1876
(850) 425-5203 Telephone
(850) 425-1942 Telefax

Attorney for Xspedius Communications, LLC

Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Thomas M. Koutsky
Z-Tel Communications, Inc.
1200 19th Street, NW
Suite 500
Washington, DC 20036
(202) 955-9652 Telephone

Attorneys for Z-Tel Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Prehearing Statement of the FCCA, AT&T Covad, ITC^DeltaCom, KMC, MCI, NewSouth, Supra, Xspedius and Z-Tel has been provided by (*) hand delivery, (**) email and U.S. Mail this 27th day of January 2004, to the following:

(**) Jeremy Susac, Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(**) Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

(**) Richard Chapkis
Verizon Florida, Inc.
201 North Franklin Street
MC: FLTC0717
Tampa, Florida 33602

(**) Susan Masterton
Sprint Communications Company
1313 Blairstone Road
Post Office Box 2214
MC: FLTLHO0107
Tallahassee, Florida 32301

(**) Michael Gross
Florida Cable Telecommunications
246 East 6th Avenue
Tallahassee, Florida 32302

(**) Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801

(**) Jeffrey J. Binder
Allegiance Telecom, Inc.
1919 M Street, NW
Washington, DC 20037

(**) Rand Currier
Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA

(**) Andrew O. Isar
Miller Isar, Inc.
2901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335

(**) Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801

(**) Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

(**) Michael B. Twomey
Post Office Box 5256
Tallahassee, Florida 32314-5256

Joseph A. McGlothlin