

EXHIBIT B
Docket Nos. 070691-TP/080036-TP
Verizon Florida LLC's Responses to
Staff's First Set of Interrogatories (No. 12)

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	BrightHouse CCNA=BHS	Comcast CCNA=BPH
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Feb-07		
Mar-07		
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18. Does Verizon keep records of how many customers have been deterred from switching to Bright House/Comcast or another carrier due to Verizon's retention marketing? If so, please provide those numbers for Bright House and Comcast, respectively.

RESPONSE:

Subject to and without waiving the General Objections, Verizon states that it only keeps records of the number of customers that have elected to stay with Verizon after receiving a retention marketing offer on a regional basis, not by state or by carrier. For the Southeast region, which includes Florida, South Carolina and North Carolina, in 2007 there were XXXXX customers in 2007 who elected to stay with or switch back to Verizon in response to a retention marketing offer. From January 1, 2008 to April 15, 2008, there were XXXXX customers in the Southeast region who elected to stay with or switch back to Verizon in response to a retention marketing offer.

19. Why does Verizon consider its relationship with Bright House/Comcast to be on the *retail* side of its services, while Bright House and Comcast believe that they are on Verizon's *wholesale* side?

RESPONSE:

Subject to and without waiving the General Objections, Verizon states that Bright House and Comcast are not submitting LNP-only LSRs for the purpose of requesting Verizon to provide telecommunications services to them, nor are they submitting such LSRs for the purpose of enabling them to offer two-way telecommunications service to the public for hire. Bright House and Comcast submit LNP-only LSRs, on behalf of retail customers, that notify Verizon that they will port the retail customer's number and request Verizon to disconnect the customer's retail service.

20. On page 5 of Verizon's Motion to Dismiss Complaint or, in the Alternative, Stay Proceedings, Verizon states that Bright House/Comcast had recognized, "Verizon does not require a customer to inform it directly of a request to cancel service." Further, Verizon asserts that when it receives an LSR for LNP from Bright House/Comcast, Verizon issues a retail disconnect order to ensure that the customer's retail service is disconnected at the correct time, that the customer does not experience loss of dial tone or missed calls, and that the billing from Verizon and Bright House/Comcast does not overlap. Verizon then states that in response to this "retail loss," Verizon provides additional information to the customer so that the customer can choose whether or not to switch to Bright House/Comcast or remain with Verizon. On page 6 of the same Motion,

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