

**Ruth Nettles**

090501-TP

**From:** beth.keating@akerman.com  
**Sent:** Tuesday, February 23, 2010 4:34 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket No. 090501-TP  
**Attachments:** Bright House Initial Objections and Requests for Clarification.pdf

Attached for electronic filing in the referenced docket, please find Bright House Networks Information Services (Florida), LLC's Initial Objections and Requests for Clarification of Verizon's First Set of Interrogatories and First Requests for Production of Documents to Bright House. Please don't hesitate to let me know if you have any questions.

Sincerely,  
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B. Docket No. 090501-TP: Petition for arbitration of certain terms and conditions of an interconnection agreement with Verizon Florida, LLC by Bright House Networks Information Services (Florida), LLC.

C. On behalf of Bright House Networks Information Services (Florida), LLC

D. Number of Pages: 10

E. BHNIS's Initial Objections and Requests for Clarification



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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Bright House Networks Information  
Services (Florida), LLC

Docket No. 090501

Petition for Arbitration of Terms and Conditions  
of An Interconnection Agreement with Verizon  
Florida, LLC

**BRIGHT HOUSE'S INITIAL OBJECTIONS TO AND  
REQUESTS FOR CLARIFICATION OF  
VERIZON FLORIDA LLC'S FIRST SET OF INTERROGATORIES (NOS. 1-21) AND FIRST  
REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1-8)**

Pursuant to the Order Establishing Procedure for this Docket, Order No. PSC-10-0081-PCO-TP, Bright House Networks Information Services (Florida), LLC, ("Bright House") hereby submits its initial objections to and requests for clarification of the first set of interrogatories (Nos. 1-21) and First Requests for Production of Documents (Nos. 1-8) of Verizon Florida LLC ("Verizon") in the above-captioned proceeding.

**Initial General Objections**

As a general matter, Bright House objects to any definitions or instructions that are inconsistent with Bright House's discovery obligations under the Order Establishing Procedure and applicable rules.

Bright House objects to each and every request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations or are not properly defined or explained for purposes of such discovery requests.

Bright House also objects to any request that would require Bright House or its experts to prepare studies, analyses, or to do additional work or create additional documents in order to respond.

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In addition, many of Verizon's discovery requests seek information that is highly proprietary and confidential. Verizon has indicated that it is willing to negotiate a non-disclosure agreement with Bright House. Because the parties have not yet had sufficient time to negotiate and execute such an agreement, however, at this time Bright House objects to interrogatories 1 through 8, 11 through 13, and 16, and, likewise, objects to production of document requests 1 through 4, 7 and 8, on the basis that the information and documents necessary to provide responses to these interrogatories is highly proprietary and confidential.

In providing these initial objections in conjunction with Bright House's requests for clarification, Bright House in no way waives its right to timely assert additional general and specific objections to Verizon's discovery, consistent with Order No. PSC-10-0081-PCO-TP.

**Specific Requests for Clarification**

Bright House requests clarification of Verizon interrogatories numbers 1-6, 8, 12, 13, and production of documents requests 3, 4, 7 and 8. These requests for clarification should in no way be construed to waive Bright House's objections as stated above. The specific discovery requests are repeated below in **bold text** for purposes of convenience, along with the requested clarification.

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Clarification of Interrogatories

- 1. Please state the number of Bright House Cable Florida voice service customers at year end for 2007, 2008 and 2009.**

Please clarify what is meant by the phrase "voice service." In the absence of any clarification from Verizon, we will interpret it to refer to Bright House Cable's Home Phone service.

- 2. Please state the number of Bright House Cable Florida voice service customers at year end for 2007, 2008 and 2009 served by means of Internet Protocol ("IP") technology.**

Please clarify what is meant by the phrase "voice service." In the absence of any clarification from Verizon, we will interpret it to refer to Bright House Cable's Home Phone service.

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**3. Please state the number of Bright House Cable Florida voice service customers in Verizon's service territory at year end for 2007, 2008 and 2009.**

Please clarify what is meant by the phrase "voice service." In the absence of any clarification from Verizon, we will interpret it to refer to Bright House Cable's Home Phone service.

**4. Please state the number of Bright House Cable Florida voice service customers in Verizon's service territory at year end for 2007, 2008 and 2009 that Bright House Cable service using IP technology.**

Please clarify what is meant by the phrase "voice service." In the absence of any clarification from Verizon, we will interpret it to refer to Bright House Cable's Home Phone service.

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**5. Please state the Company's cost for each month from January 2007 to January 2010, of (a) converting its Florida intrastate traffic from IP to time division multiplexing ("TDM") protocol for delivery to local exchange companies in Florida; and (b) converting to IP the Florida intrastate traffic the Company received in TDM protocol from local exchange carriers.**

Please clarify what is meant by "cost" in interrogatory 5, and the level of detail sought regarding such costs.

**6. Please state the Company's cost for each month from January 2007 to January 2010, of (a) converting its Florida intrastate traffic delivered to Verizon from IP to TDM; and (b) converting to IP the Florida intrastate traffic the Company received in TDM protocol from Verizon.**

Please clarify what is meant by "cost" in interrogatory 6, and the level of detail sought regarding such costs.

Initial Objections and Requests for Clarification of Verizon's First Set of Interrogatories and  
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**8. If the Company itself converts intrastate traffic from IP to TDM (and/or from TDM to IP), please explain how the Company calculated the conversion costs stated in response to Interrogatory Nos. 5 and 6.**

Please clarify what is meant by "cost" in interrogatories 5, 6 and 8, and the level of detail on such cost sought for each interrogatory.

**12. Please state the estimate of the costs, if any, of configuring the Company's Florida network to accommodate interconnection with Verizon in IP format.**

Please clarify what is meant by "cost" in interrogatory 12, and the level of detail sought regarding such costs.

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**13. Please state the amount of expense the Company expects to save by exchanging Florida traffic with Verizon in IP format and explain how that amount was calculated.**

Please clarify what is meant by “expense” in interrogatory 13, and the level of detail sought regarding such costs.

*Clarification of Production of Document Requests*

**3. Please provide all documents supporting or otherwise relating to your response to Verizon’s Interrogatory No. 12.**

Please clarify what is meant by “cost” in interrogatory 12, and the level of detail sought regarding such costs.

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**4. Please provide all documents supporting or otherwise relating to your response to Verizon's Interrogatory No. 13.**

Please clarify what is meant by "expense" in interrogatory 13, and the level of detail sought regarding such expenses.

**7. Please provide all documents evidencing, reflecting or relating to the costs or benefits of interconnection in IP format with Verizon or other local exchange carriers.**

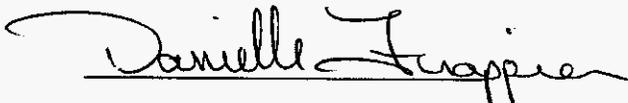
Please clarify what is meant by "cost" in document request 7, and the level of detail sought regarding such costs.

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**8. Please provide all documents evidencing, reflecting or relating to the cost savings the Company expects to realize from interconnection in IP format with Verizon or other local exchange carriers.**

Please clarify what is meant by "cost" in document request 8, and the level of detail sought regarding such costs.

Respectfully submitted this 23<sup>rd</sup> day of February, 2010,



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail to the persons listed below this 23rd day of February, 2010:

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