

REDACTED

any Bright House employee. Verizon understands that no such employees have signed the confidentiality agreement, so none will be provided access to this information. If that understanding is incorrect, Bright House counsel is asked to contact Verizon counsel as soon as possible and not to provide access to this confidential information to any Bright House employee:

- (a) In 2009, XX carrier customers purchased special access services in the Tampa LATA from Verizon's Florida intrastate access tariff. Retail account information is not readily available on a customer-specific basis.
 - (b) See response to subpart (a).
 - (c) The number of special access circuits Verizon sells is not readily available. In an effort to be responsive, Verizon states that its carrier customers had on average XXXXX special access channel terminations in service each month in 2009 that were purchased under Verizon's Florida intrastate access tariff. This figure includes channel terminations at the DS0, DS1 and DS3 levels. Comparable information for retail customers is not readily available. Verizon notes that in 2009 approximately XXX of its Florida intrastate special access revenue was from services purchased by carrier customers and XXX was from retail customers.
 - (d) See response to subpart (d).
38. Please refer to Mr. Munsell's direct testimony at page 1, lines 1-3. Please state whether Mr. Munsell is employed by Verizon Florida, LLC. If so, please state whether Mr. Munsell maintains an office in the state of Florida. If not, please state the entity that employs Mr. Munsell.

RESPONSE: Mr. Munsell is not employed by Verizon Florida LLC. As stated in Mr. Munsell's Direct Testimony at page 1, lines 1-3, Mr. Munsell is employed by Verizon Services Corporation. In that capacity, he provides support to various Verizon Communications Inc. operating telephone company subsidiaries, including Verizon Florida LLC.

39. Please refer to Mr. Munsell's direct testimony at page 1, lines 16-25. It does not appear that Mr. Munsell notes or describes any prior testimony he may have provided to a regulatory body regarding issues arising under the 1996 Act. If Mr. Munsell has never provided any such testimony, please expressly so state. If he has, please identify the proceeding(s) in which it was given, and provide a succinct description of the subject matter of such testimony, in sufficient detail to reasonably ascertain whether any of his prior testimony is relevant to issues or subject matters at issue between the parties in this case.

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