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April 15, 2014

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RECEIVED-FPS

APR 15 PM 12: 5

OF COUNSEL HAROLD F. X. PURNELL

CONFIDENTIAL DOCUMENTS ENCLOSED

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: CLAIM OF CONFIDENTIALITY:

Northeast Florida Telephone Company's Response to 2014 Local Competition Report Data Request

REDACTED

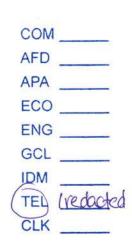
Dear Ms. Cole:

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5)(a), Florida Administrative Code, Northeast Florida Telephone Company ("Northeast Florida") hereby claims confidential treatment for certain portions of its Response to the 2014 Local Competition Report Data Request.

Enclosed herewith are the following attachments:

- (1) Attachment "A" two copies of Northeast Florida's Response with the specific information claimed to be confidential redacted; and
- (2) Attachment "B" a sealed envelope marked "CONFIDENTIAL" containing Northeast Florida's Response with the specific information claimed to be confidential highlighted in yellow.

MICHAEL J. BARRY STEPHEN A. ECENIA RICHARD M. ELLIS DIANA M. FERGUSON MARTIN P. McDONNELL J. STEPHEN MENTON R. DAVID PRESCOTT



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Ms. Carlotta S. Stauffer 4/15/2014 Page 2

Northeast Florida asserts that the documents in Attachment "B" contain proprietary confidential business information regarding the business plans of both Northeast Florida and its affiliate, NEFCOM Communications. The services addressed in the Response are local services and advanced services. Northeast Florida and its affiliate, NEFCOM Communications, are currently experiencing competition from other service providers with respect to such services within Northeast Florida's service territory.

A copy of this letter, along with a public copy of Northeast Florida's Response have been hand delivered to Beth Salak, Division of Competitive Markets & Enforcement, concurrent with this filing.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,

M.P. Madel

Martin P. McDonnell

Enclosures cc: Ms. Beth Salak

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Form 477 Submission for FRN: 3757432, Company: Northeast Florida Telephone Company, State: FL, Operations: ILEC, Data as of Dec 31, 2013

Status: On Feb 13, 2014, the status for this Form 477 submission was changed to Original - In Progress.

Data Description	Value
Data as of	Dec 31, 2013
1. FRN	3757432
2. Company	Northeast Florida Telephone Company
3. Type of Operations	@ ILEC C Non-ILEC
4. Use this drop-down list to select a single name, such as the holding company, to identify all commonly-owned or commonly-controlled filers. Commonly-controlled filers with no holding company should decide on a single name to use for this question. Select "not shown" if no appropriate name appears in the list.	Townes Telecommunications, Inc.
f you selected "not shown" above, type in the single name that will dentify all commonly-owned or commonly-controlled filers.	
5. State	FL
6. Contact person (person who prepared the submitted data)	Mandy Clevenger
7. Contact person telephone number and email address	Phone. 9042594952 Email. mclevenger@nefcom.net Confirm Email. mclevenger@nefcom.net
8. Status of submission	Original - In Progress
9. Indicate whether you request non-disclosure of some or all of the information in this submission because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.	C No G Yes
10. Official (corporate officer, managing partner, or sole proprietor) whose signature certifies that he/she has examined the information contained in this Form 477 and that, to the best of his/her knowledge, information and belief, all statements of fact contained in this Form	
477 are true and correct. For purposes of this Form 477, the entry of the official's name on this line shall constitute that official's electronic signature to this certification. Persons making willful false statements in a Form 477 can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).	Debi Nobles
	Phone. 9046880029
11. Certifying official telephone number and email address	Email. dnobles@townes.net

REDACTED

ATTACHMENT "A"

Part I.A: Broadband - Asymmetric xDSL-

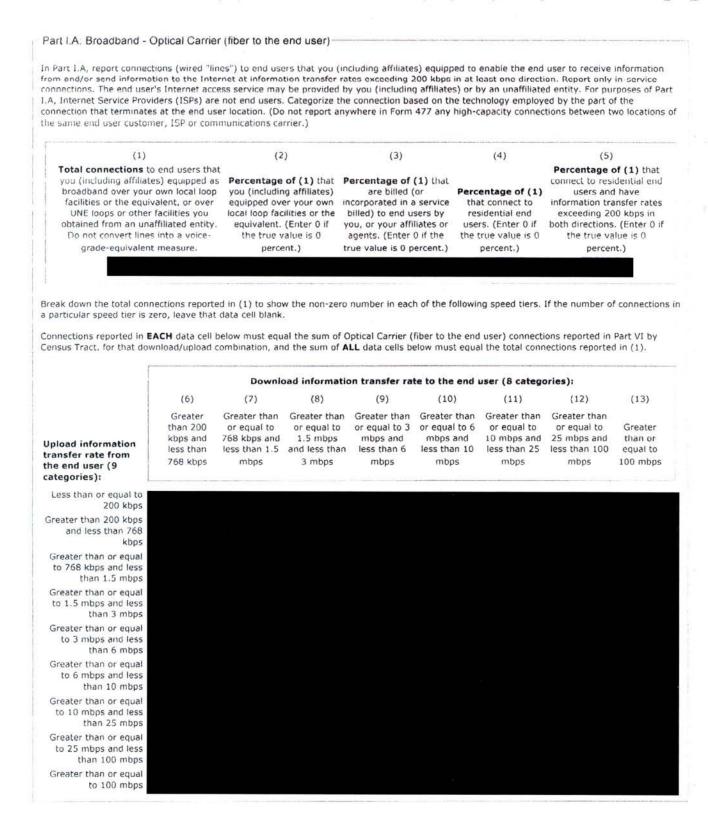
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In Part I.A, report connections (wired "lines") to end users that you (including affiliates) equipped to enable the end user to receive information from and/or send information to the Internet at information transfer rates exceeding 200 kbps in at least one direction. Report only in-service connections. The end user's Internet access service may be provided by you (including affiliates) or by an unaffiliated entity. For purposes of Part I.A, Internet Service Providers (ISPs) are not end users. Categorize the connection based on the technology employed by the part of the connection that terminates at the end user location. (Do not report anywhere in Form 477 any high-capacity connections between two locations of the same end user customer, ISP or communications carrier.)

(1)		(2)	(3)		(4)	(5)	
Total connections to you (including affiliate broadband over your facilities or the equiv UNE loops or other obtained from an una Do not convert lines grade-equivalent	es) equipped as own local loop valent, or over facilities you filiated entity. into a voice- measure.	S Percentage you (includin equipped ov local loop fac equivalent. the true v perce ed in (1) to sho	ng affiliates) er your own illities or the (Enter 0 if ralue is 0 ent.) w the non-ze	Percentage of are billed (incorporated in a billed) to end u you, or your affi agents. (Enter true value is 0 p	or F a service sers by liates or 0 if the ercent.)	Percentage of (1) that connect to residential end users. (Enter 0 if the true value is 0 percent.)	Percentage connect to res users and information tra exceeding 20 both directions the true va percent If the number o	idential end d have ansfer rates 00 kbps in 6. (Enter 0 if alue is 0 nt.)
nnections reported in EA wnload/upload combina								ract, for tha
		Downie	oad informa	tion transfer rat	te to the e	and user (8 catego	ories):	
	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
bload information ansfer rate from e end user (9 tegories):	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater tha or equal to 1.5 mbps and less tha 3 mbps	or equal to 3 mbps and	Greater th or equal t mbps an less than mbps	o 6 or equal to nd 10 mbps and	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to								
200 kbps								
eater than 200 kbps and less than 768 kbps								
Greater than or equal to 768 kbps and less than 1.5 mbps								
Freater than or equal to 1.5 mbps and less than 3 mbps								
to 3 mbps and less than 6 mbps								
ireater than or equal to 6 mbps and less than 10 mbps								
reater than or equal to 10 mbps and less than 25 mbps								
ireater than or equal to 25 mbps and less								
than 100 mbps								

This is the end of PART I.A for Asymmetric xDSL. If you are an ILEC you MUST ALSO complete Part I.B for xDSL (asymmetric or symmetric).



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Part I.B: Broadband - xDSL (asymmetric or symmetric)

Complete Part I.B for xDSL (asymmetric or symmetric) ONLY IF you are an ILEC (or an affiliate of an ILEC) that was required to complete Part I.A for Asymmetric xDSL and/or Part I.A for Symmetric xDSL.

For the purposes of completing Part I.B for xDSL (asymmetric or symmetric):

(1) "Residential end user premises" include residential living units, individual living units in such institutional settings as college dormitories and nursing homes, and other end user locations to which you (including affiliates and agents) market services that are primarily designed for residential use.

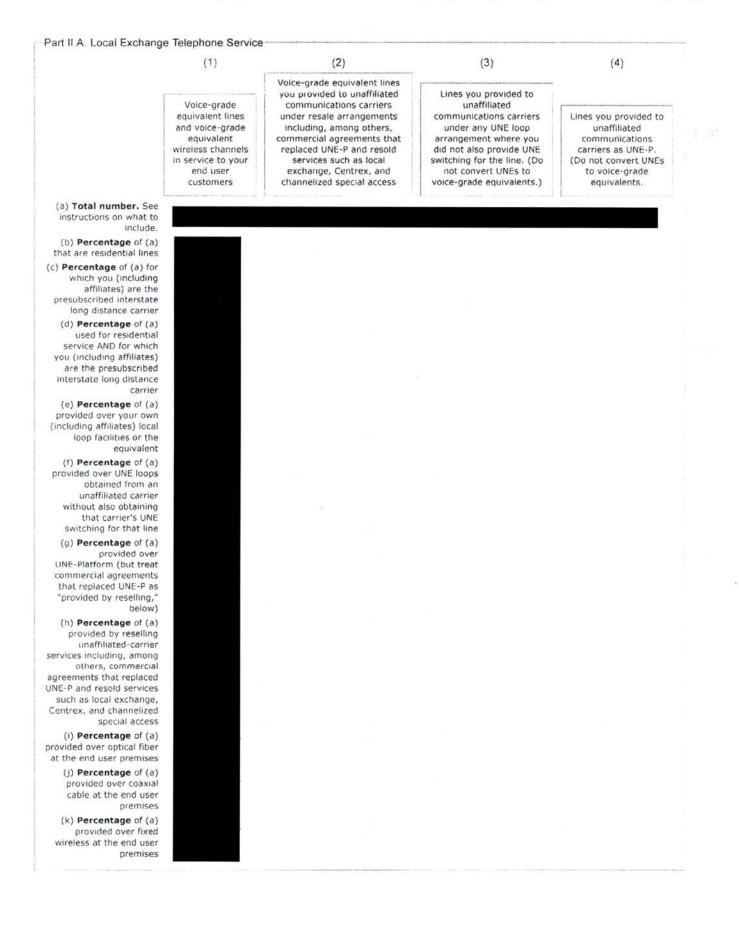
(2) The "service area" of an ILEC consists of those residential end user premises to which the ILEC can deliver telephone service over local loop facilities (or the fixed-wireless last mile equivalent) that it owns.

I.B. Report your best estimate of the percentage of residential end user premises in your service area, in this state, to which your DSL connections (with information transfer rates exceeding 200 kbps in at least one direction) could be provided using installed distribution facilities. Providers of xDSL connections should base responses on the service area of the affiliated ILECs.

(a) Estimated % of residential end user premises

THIS IS THE END OF PART I.B for xDSL (asymmetric and symmetric).

Form 477 Submission for FRN: 3757432, Company: Northeast Florida...

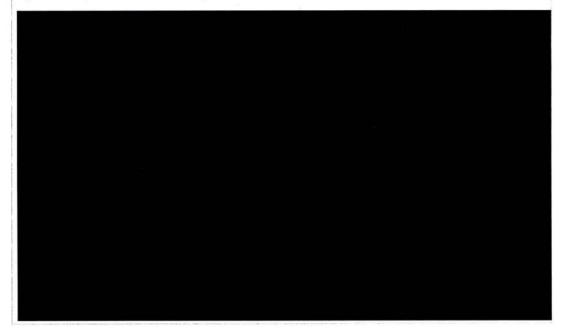


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-Part V: Zip Code Information -- Local Voice Telephone Service and Interconnected VoIP --

If you reported local exchange telephone lines in service to your end user customers, in Part II.A (1), or VoIP subscriptions that end users purchased from you, in Part II.B (1) or (2), you must list the 5-digit ZIP Codes in the state in which you had end user customers. Do not include any ZIP Codes in which you offered your local exchange telephone or VoIP service but had no end user customers, and do not include any out-of-state ZIP Codes.

Type all five digit ZIP codes in the following text box, separated by either commas, spaces, or carriage returns:



2/13/2014 11:12 AM

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Census Tract Detail - Technologies except Terrestrial Mobile Wireless

If you reported broadband connections in Part I.A in a technology category other than Terrestrial Mobile Wireless, you must specify the technology category, identify the Census Tracts in this state in which you had connections in service using that technology, and, for each Census Tract, report the number of connections and the percentage residential in each relevant download/upload information transfer rate combination.

You can use the American Factfinder to look up 2010 Census Tract numbers for street addresses.

- Census Tract / Technology.

Technology of the connections: Asymmetric xDSL

Census Tract: State: FL County: Baker County Census Tract: 401.01

			DOWNLOA	D INFORMA	TION TRAN	SFER RATE.		
PLOAD INFORMATION TRANSFER RATE:	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to 200 kbps Number of Connections: Percentage Residential:								
Greater than 200 kbps and less than 768 kbps Number of Connections: Percentage Residential:								
Greater than or equal to 768 kbps and less than 1.5 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 1.5 mbps and less than 3 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 3 mbps and less than 6 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 6 mbps and less than 10 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 10 mbps and less than 25 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 25 mbps and less than 100 mbps Number of Connections: Percentage Residential:								
reater than or equal to 100 mbps Number of Connections: Percentage Residential:								

Census Tract Detail - Technologies except Terrestrial Mobile Wireless -

If you reported broadband connections in Part I.A in a technology category other than Terrestrial Mobile Wireless, you must specify the technology category, identify the Census Tracts in this state in which you had connections in service using that technology, and, for each Census Tract, report the number of connections and the percentage residential in each relevant download/upload information transfer rate combination.

You can use the American Factfinder to look up 2010 Census Tract numbers for street addresses.

Census Tract / Technology.

Technology of the connections: Asymmetric xDSL

Census Tract: State: FL County: Baker County Census Tract: 401.02

			DOWNLOA	D INFORMA	TION TRAN	SFER RATE		
JPLOAD INFORMATION TRANSFER RATE:	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to 200 kbps Number of Connections: Percentage Residential:								
Greater than 200 kbps and less than 768 kbps Number of Connections: Percentage Residential:								
Greater than or equal to 768 kbps and less than 1.5 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 1.5 mbps and less than 3 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 3 mbps and less than 6 mbps Number of Connections:								
Percentage Residential: Greater than or equal to 6 mbps and less than 10 mbps Number of Connections:								
Percentage Residential: Greater than or equal to 10 mbps and less than 25 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 25 mbps and less than 100 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 100 mbps Number of Connections: Percentage Residential:								

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Census Tract Detail - Technologies except Terrestrial Mobile Wireless -

If you reported broadband connections in Part I.A in a technology category other than Terrestrial Mobile Wireless, you must specify the technology category, identify the Census Tracts in this state in which you had connections in service using that technology, and, for each Census Tract, report the number of connections and the percentage residential in each relevant download/upload information transfer rate combination.

You can use the American Factfinder to look up 2010 Census Tract numbers for street addresses.

Census Tract / Technology. -

Technology of the connections: Asymmetric xDSL

Census Tract: State: FL County: Baker County Census Tract: 402.01

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			DOWNLOA	D INFORMA	TION TRAN	SFER RATE.		
UPLOAD INFORMATION TRANSFER	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to 200 kbps								
Number of Connections: Percentage Residential:								
Greater than 200 kbps and less								
than 768 kbps Number of Connections:								
Percentage Residential:								
Greater than or equal to 768 kbps and less than 1.5 mbps Number of Connections:								
Percentage Residential:								
Greater than or equal to 1.5 mbps and less than 3 mbps Number of Connections:								
Percentage Residential: Greater than or equal to 3 mbps								
and less than 6 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 6 mbps								
and less than 10 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 10 mbps								
and less than 25 mbps Number of Connections:								
Percentage Residential:								
Greater than or equal to 25 mbps and less than 100 mbps Number of Connections: Percentage Residential:								
Greater than or equal to 100 mbps Number of Connections: Percentage Residential:								

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Census Tract Detail - Technologies except Terrestrial Mobile Wireless

If you reported broadband connections in Part 1.A in a technology category other than Terrestrial Mobile Wireless, you must specify the technology category, identify the Census Tracts in this state in which you had connections in service using that technology, and, for each Census Tract, report the number of connections and the percentage residential in each relevant download/upload information transfer rate combination.

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Census Tract / Technology. -

Technology of the connections: Asymmetric xDSL

Census Tract: State: FL County: Baker County Census Tract: 402.02

			DOWNLOA	D INFORMA	TION TRAN	SFER RATE.		
UPLOAD INFORMATION TRANSFER RATE:	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to 200 kbps Number of Connections: Percentage Residential:								
Greater than 200 kbps and less than 768 kbps Number of Connections: Percentage Residential:								
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Census Tract Detail - Technologies except Terrestrial Mobile Wireless

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You can use the American Factfinder to look up 2010 Census Tract numbers for street addresses.

Census Tract / Technology.

Technology of the connections: Optical Carrier (fiber to the end user)

Census Tract: State: FL County: Baker County Census Tract: 401.01

			DOWNLOA	D INFORMAT	TION TRAN	SFER RATE.		
	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5	Greater than or equal to 1.5 mbps and less than 3	Greater than or equal to 3 mbps and less than 6	Greater than or equal to 6 mbps and less than	Greater than or equal to 10 mbps and less than	mbps and less than	Greater than or equal to 100 mbps
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-Census Tract Detail - Technologies except Terrestrial Mobile Wireless -

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You can use the American Factfinder to look up 2010 Census Tract numbers for street addresses.

- Census Tract / Technology.

Technology of the connections: Optical Carrier (fiber to the end user)

Census Tract: State: FL County: Baker County Census Tract: 402.02

			DOWNLOA	D INFORMA	TION TRAN	ISFER RATE.		
PLOAD INFORMATION TRANSFER RATE:	Greater than 200 kbps and less than 768 kbps	Greater than or equal to 768 kbps and less than 1.5 mbps	Greater than or equal to 1.5 mbps and less than 3 mbps	Greater than or equal to 3 mbps and less than 6 mbps	Greater than or equal to 6 mbps and less than 10 mbps	Greater than or equal to 10 mbps and less than 25 mbps	Greater than or equal to 25 mbps and less than 100 mbps	Greater than or equal to 100 mbps
Less than or equal to 200 kbps							11	
Number of Connections: Percentage Residential:								
Greater than 200 kbps and less								
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Connections: Percentage Residential:								
Greater than or equal to 768 kbps and less than 1.5 mbps Number of Connections:								
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