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**COMPLIANCE**  
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May 9, 2011

**IMPORTANT NOTICE REGARDING COMPLIANCE & REPORTING**

COMMISSION  
CLERK

Clerk's Office  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

110000-OT

**Re: Metropolitan Telecommunications of Florida, Inc. (MetTel)  
2<sup>nd</sup> Revised Florida 2011 Local Competition Data Request  
For the Year Ended December 31, 2010**

To Whom It May Concern:

Enclosed please find the 2<sup>nd</sup> Revised Florida 2011 Local Competition Data Request for the year ended December 31, 2010, filed on behalf of Metropolitan Telecommunications of Florida, Inc. (MetTel). These revisions have been made to reflect actual access lines and NPA/NXXs within the state of Florida

A copy of the 2<sup>nd</sup> Revised Confidential Report has been marked as Confidential. MetTel is requesting confidential treatment of the areas that are highlighted in yellow. These forms have been placed in a sealed envelope marked "CONFIDENTIAL". A CD marked "CONFIDENTIAL" which contains MetTel's confidential submission in Excel has also been enclosed.

Please contact Meghan Ruwet at (303) 663-0102 or [mtr@compliancegroup.com](mailto:mtr@compliancegroup.com) with any questions concerning this filing. Thank you for your assistance in this matter.

Sincerely,

COM	_____	Meghan Ruwet
APA	_____	The <i>Compliance</i> Group
ECR	_____	Consultant
GCL	_____	Telephone: (303) 663-0102
RAD	_____	Email: <a href="mailto:mtr@compliancegroup.com">mtr@compliancegroup.com</a>
SNC	_____	
ADM	_____	
OPC	_____	
CLK	_____	

11 MAY 10 2:38 PM

DOCUMENT NUMBER-DATE

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**Table 1: Traditional Retail Switched Access Lines on a Voice-Grade Equivalent (VGE) Basis**

**Company Name:**

Metropolitan Telecommunications of Florida, Inc. (MetTel)

**Company Code\*:**

TX408

**REDACTED**

\* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE TRADITIONAL RETAIL SWITCHED ACCESS LINES. DO NOT INCLUDE LINES REPORTED IN TABLE 5.**

Complete Table 1 if you provided *voice telephone service* to Florida *end users* via one or more *voice-grade equivalent (VGE)* lines or fixed wireless *VGE* channels. See FCC Form 477 definitions and instructions for *Line A.//* and complete this table accordingly.

Each NPA-NXX and corresponding data must be entered in a separate row. Please combine lines that have the same NPA-NXX.

Do not report special access lines or any high-capacity connections between two locations of the same end user, ISP, or telecommunications carrier.

Please include a grand total row in the last row of data. Each cell in the table must be populated. If you have no lines for an exchange in any of the various line types, you must enter a zero. Numbers should be formatted as percentages.

Please report all UNE-P lines in column G including those governed by commercial agreements.

Please provide data as of December 31, 2010.

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(1)	(a)	Percentages of lines and wireless channels reported in (a)**											
		(b)	(e)		(f)		(g)		(h)		(i)		
		Residential lines	Provided over your own local loop facilities or the fixed wireless last-mile equivalent		Provided over UNE loops obtained without UNE switching		Provided over UNE-P Platform		Provided by reselling another carrier's service (including Centrex/Centron or channelized special access service)		Provided over optical fiber facilities used in the part of the line that connects to the end user premises		Provided over coaxial cable at the end user premises ("cable telephony")
	Total VGE lines and VGE wireless channels in service		Res	Bus	Res	Bus	Res	Bus	Res	Bus	Res	Bus	Res
II.A. Voice telephone service provided to end users: NPA-NXX i.e.(850-413)													
Total lines and channels you provided to end users:													

\* \*\*We are not asking for information contained in colu

DOCUMENT NUMBER-DATE  
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**Table 2: Resold Lines Provided to Unaffiliated Telecommunications Carriers on a Voice-Grade Equivalent (VGE) Basis**

**Company Name:**

Metropolitan Telecommunications of Florida, INC. (MetTel)

**Company Code\*:**

TX408

\* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE RESOLD LINES PROVIDED TO UNAFFILIATED TELECOMMUNICATIONS CARRIERS.**

Complete Table 2 if you provided one or more *voice-grade equivalent (VGE)* lines or fixed wireless *VGE* channels to *unaffiliated* telecommunications carriers, including those under *commercial* agreements, to enable the *unaffiliated* carriers to provide *voice telephone service* to Florida end users. See FCC Form 477 definitions and instructions for *Line B.II-2* and *Line B.II-3* and complete this table accordingly, except that you should *not* report any UNE-Ps in this table.

Each NPA-NXX and corresponding data must be entered in a separate row.  
Please combine lines that have the same NPA-NXX.

Report all lines and channels under *resale* arrangements with *unaffiliated* carriers, including *other resale* arrangements under *commercial* agreements that replace, or substitute for, UNE arrangements or line-sharing. However, do *not* report any Local Platform (formerly known as UNE-P) loops in this table, as those should be reported in Table 4. Examples of *other resale* arrangements also include *Centrex/Centron* or *Special Access* service to enable the *unaffiliated* carriers to provide *local* telephone service to their end users. However, do *not* report special access lines or any high-capacity connections *between two locations of the same* end user, ISP or telecommunications carrier.

Please provide data as of December 31, 2010.

(1) NPA-NXX i.e.(850-413)	(2) Res or Bus	(a) Total VGE lines and VGE wireless channels in service
II.B. <i>Voice telephone service</i> that you provided to <i>unaffiliated</i> telecommunications carriers, categorized by: Lines and channels under <i>Resale</i> arrangements		

**Table 3: UNE Loops Without Switching Provided to Unaffiliated Telecommunications Carriers - Not on VGE Basis**

**Company Name:**

Metropolitan Telecommunications of Florida, Inc. (MetTel)

**Company Code\*:**

TX408

\* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE UNE LOOPS WITHOUT SWITCHING PROVIDED TO UNAFFILIATED TELECOMMUNICATIONS CARRIERS.**

Complete Table 3 if you provided circuits to *unaffiliated* telecommunications carriers under an *unbundled network element (UNE) loop* arrangement, including those under *commercial* agreements, to enable the *unaffiliated* carrier to provide *voice telephone service* to Florida end users. See FCC Form 477 definitions and instructions for *Line C.II-4* and complete this table accordingly.

Each NPA-NXX and corresponding data must be entered in a separate row.  
Please combine lines that have the same NPA-NXX.

Please provide data as of December 31, 2010.

	(1) NPA-NXX i.e.(850-413)	(2) Res or Bus	(a) Total lines and wireless channels (do <i>not</i> convert to VGEs)
II.C. UNE Loops that you provided to <i>unaffiliated</i> telecommunications carriers, categorized by:			
Lines and channels under a UNE loop arrangement, where you <i>did not provide switching</i> for the line.			

**Table 4: UNE Loops With Switching (formerly known as UNE-P) Provided to Unaffiliated Telecommunications Carriers - Not on VGE Basis**

**Company Name:**

Metropolitan Telecommunications of MetTel, Inc. (MetTel)

**Company Code\*:**

TX408

\* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE UNE LOOPS WITH SWITCHING PROVIDED TO UNAFFILIATED TELECOMMUNICATIONS CARRIERS.**

Complete Table 4 if you provided circuits to *unaffiliated* telecommunications carriers under a *Local Platform* (formerly known as *UNE-P*) arrangement, including those under *commercial* agreements, to enable the *unaffiliated* carriers to provide *voice telephone service* to Florida end users. See FCC Form 477 definitions and instructions for *Line C.II-5* and complete this table accordingly, except that you should include the UNE-Ps governed by *commercial* agreements in this table, not in Table 2.

Each NPA-NXX and corresponding data must be entered in a separate row.  
Please combine lines that have the same NPA-NXX.

Please provide data as of December 31, 2010.

II.C. UNE Loops that you provided to <i>unaffiliated</i> telecommunications carriers, categorized by:	(1) NPA-NXX i.e.(850-413)	(2) Res or Bus	(a) Total lines and wireless channels (do <i>not</i> convert to VGEs)
Lines and channels under a UNE loop arrangement, where you also <i>provided switching</i> for the line (" <i>Local Platform</i> ", formerly <i>UNE-P</i> ").			

**Table 5: VoIP Access Lines on a Voice-Grade Equivalent (VGE) Basis**

**Company Name:** Metropolitan Telecommunications of Florida, Inc. (MetTel)

**Company Code\*:** TX408

\* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

**THIS TABLE IS TO ONLY CAPTURE VoIP LINES. DO NOT INCLUDE LINES REPORTED IN TABLE 1.**

Complete Table 5 if you provided VoIP service to Florida end users via one or more voice-grade equivalent (VGE) lines or wireless VGE channels.

An access line connects the end user's customer premises equipment (CPE) to the serving switch and allows the end user to originate and/or terminate local telephone calls on the public switched telephone network (PSTN). The access line counts in Table 5 below must be based on all of your different types of access lines (including fixed wireless) that are used to provide VoIP service.

Each field must be populated. All entries must be made without quotation marks.

The data must include lines of all affiliated companies.

**TABLE COLUMN INSTRUCTIONS:**

Column (a). Reported NPA-NXX data should not be based on secondary service locations (i.e., where service has been moved temporarily to a secondary location such as a vacation home).

Each NPA-NXX and corresponding data must be entered in a separate row. Please combine lines that have the same NPA-NXX.

Column (b). Enter the abbreviation Res for Residential lines or Bus for Business lines. Residential lines and business lines must be entered in separate rows.

Column (c). Enter line count as voice-grade equivalents (VGEs). Report VGEs based on how the customer is billed. If the customer is billed for a dynamic bandwidth VoIP product, the line count would be the maximum number of VoIP lines available. If the customer is billed for a specific number of VoIP lines, or a range of lines, the VoIP line count would be the number of VoIP lines or the highest number of the range, respectively. Each line count must be entered in separate rows.

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Please provide data as of December 31, 2010.

(a)	(b)	(c)
NPA-NXX i.e.(850-413)	Res or Bus	Total VGE Lines
[Redacted Data]		

**AFFIDAVIT**  
**REQUESTING CONFIDENTIAL TREATMENT OF FINANCIAL INFORMATION**

1. Metropolitan Telecommunications of Florida, Inc. ("MetTel"), through their attorney, hereby requests the Florida Public Service Commission ("Commission") afford confidential treatment of the financial information submitted with its 2011 Local Competition Data Request.

2. In support of said request, the following information is provided.

3. The access line information submitted with its 2011 Local Competition Data Request contains commercially sensitive information regarding the company's operations. The disclosure of this information in the context of the above-captioned docket or otherwise could provide MetTel's competitors with valuable insight into the company's financial structure and planned operations. Because this represents highly confidential and strictly proprietary information, the disclosure of which to the public, including competitors, could result in direct and immediate harm to the competitive position of MetTel, there is a genuine need to seek non-disclosure of this information.

4. While the Commission needs to review this information, the general public has no direct or substantive interest in this information.

5. MetTel's competitors also do not require this information other than to gain potential competitive advantage or to use the information in an unfair and potentially anti-competitive manner.

6. The enduring policies of the state have been to encourage and support competition in telecommunications. Essential to the proper workings of that policy is the

DOCUMENT NUMBER-DATE

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maintenance of a level playing field in which competitors are made to compete on their own merits relative to price, service quality, innovation and customer service. Allowing access to one competitor's commercially sensitive information runs contrary to these principles and, hence, would not serve the public interest.

7. The information sought to be protected has not been made public in any other forum or jurisdiction.

8. Accordingly, MetTel respectfully request the Commission afford confidential treatment of the financial information submitted with its 2010 Local Competition Data Request.

Respectfully submitted,



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The CommLaw Group  
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McLean, Virginia 22102  
(703) 714-1300 (Tel)  
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jsm@commlawgroup.com (Email)

Sworn and subscribed this \_\_\_\_\_ day of 13<sup>th</sup> day of April 2011.