

THE COMPLIANCE GROUP

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 01477-13, which
is in locked storage. You must be
authorized to view this DN.-CLK

March 20, 2013

IMPORTANT NOTICE REGARDING COMPLIANCE & REPORTING

Victor Cordiano
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

130000-OT

**Re: Metropolitan Telecommunications of Florida, Inc. (MetTel)
Florida 2013 Local Competition Data Request
For the Year Ended December 31, 2012**

To Whom It May Concern:

Enclosed please find the Florida 2013 Local Competition Data Request for the year ended December 31, 2012, filed on behalf of Metropolitan Telecommunications of Florida, Inc. (MetTel).

A copy of the 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.

In addition to the Confidential Reports, MetTel has enclosed two copies of the Public Report on which the portions considered Confidential have been blackened out.

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

Sincerely,

Meghan Ruwet
The *Compliance* Group
Consultant
Telephone: (303) 663-0102
Email: mtr@compliancegroup.com

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
TEL _____
CLK _____

DOCUMENT NUMBER DATE

01476 MAR 27 2013

FPSC-COMMISSION CLERK

3.27.13
DNS brought to CLK's office by TEL/Bates; who read DNS from APA. *M. Ruwet*
Cordiano

2013 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by April 15, 2013)¹

Legal Company Name: Metropolitan Telecommunications of Florida, Inc.
 D/B/A: MetTel
 FPSC Company Code (e.g., TX000) TX408
 Contact name & title: Meghan Ruwet, Consultant
 Telephone number: (303) 663-0102
 E-mail address: mtr@commpliancegroup.com
 Stock Symbol (if company is publicly traded): Not Applicable

Services Provided in Florida

1. Do you currently serve local telephone subscribers in Florida? Please check yes or no for both wireline and VoIP.

Residential		Business	
Wireline	VoIP	Wireline	VoIP
<u> X </u> Yes	<u> </u> Yes	<u> X </u> Yes	<u> X </u> Yes
<u> </u> No	<u> X </u> No	<u> </u> No	<u> </u> No

2. Please complete all applicable data tables.
3. If you submitted data tables in 2012, please provide an explanation below of any differences in the number of access lines by category that occurs in your 2013 submission that exceeds 10 percent.

MetTel has increased their customer base over the past year.

4. How is your local service provisioned? Please mark the appropriate response(s).

X Resold lines from ILEC
 X Wholesale platform (formerly known as UNE-P)
 X UNEs (other than wholesale platform) from ILEC
 Elements (e.g., loops, switching) from other than ILEC (e.g., other CLECs)

¹ The due date is established by Section 364.386(1)(b), Florida Statutes. Failure to comply with this rule may result in the Commission assessing penalties of up to \$25,000 per offense, with each day of noncompliance constituting a separate offense per Section 364.285(1), Florida Statutes.

Completely self-provisioned
 Other (please describe) _____

5. What services, other than local service, does your company currently provide in Florida? Please check all that apply.

<input checked="" type="checkbox"/> Private line/special access	<input type="checkbox"/> Wholesale loops
<input checked="" type="checkbox"/> VoIP	<input type="checkbox"/> Fiber or copper based video service
<input type="checkbox"/> Wholesale transport	<input type="checkbox"/> Cable television
<input checked="" type="checkbox"/> Interexchange service	<input type="checkbox"/> Satellite television
<input checked="" type="checkbox"/> Cellular/wireless service	<input checked="" type="checkbox"/> Broadband Internet access

Bundled Services

6. What percentage of your Florida residential and business customers purchase bundled (i.e. voice service packaged with additional services such as internet or video service) offerings? Please provide the percentage below. Do not include bundles of telecom-only services. If you do not offer bundled services, indicate "not applicable."

Residential
 Business
 Not applicable

VoIP

7. Indicate below whether you are currently providing VoIP service to end users in Florida. VoIP service is defined as IP-based voice service over a digital connection. Please check all that apply.

Not providing VoIP service to end users
 Providing VoIP services to business end users
 Providing VoIP services to residential end users

8. If you are providing VoIP service in Florida, please check all that apply:

Peer-to-Peer only (no interconnection with PSTN)
 Use of public Internet
 Use of private IP network

Broadband

9. Do you offer broadband to residential customers in Florida?
 Yes

X No

10. If you do offer broadband to residential customers in Florida, please provide your best estimate of the percentage of residential end user premises in your Florida service area for which your broadband services are available.

 Not Applicable

11. How many residential broadband subscribers do you have in Florida?

 Not Applicable

12. Please list the method(s) of broadband provisioning utilized in Florida by your company (i.e. DSL, cable modem, fiber, etc.). **DSL, T1**

13. What are the typical downstream and upstream speeds for your most subscribed to broadband service? **ADSL D1.0M/U384K-Dynamic IP**

14. What is the monthly price for your most subscribed to residential broadband service? **Not Applicable**

Fiber Deployment

15. Did you deploy fiber to homes or businesses in Florida between January 1, 2012 and December 31, 2012?

 Yes

 X No

16. Please provide the number of new residential and business subscribers served by Fiber-to-the-Home, Fiber-to-the-Premises, and/or Fiber-to-the-Curb technology since the last reporting period.

 N/A Residential Subscribers

 N/A Business Subscribers

 N/A Total

17. Please provide your company's total number of residential and business subscribers currently served by Fiber-to-the-Home, Fiber-to-the-Premises, and/or Fiber-to-the-Curb technology.

 N/A Residential Subscribers

 N/A Business Subscribers

 N/A Total

Miscellaneous

18. In calendar year 2012, how much money did you invest in your network directly serving Florida's local service customers? Please check the applicable answer.

- 1. \$0
- 2. \$1 - \$249,999
- 3. \$250,000 - \$999,999
- 4. \$1,000,000 - \$9,999,999
- 5. \$10,000,000 or more

20. Are you currently operating under Chapter 7 or Chapter 11 bankruptcy protection? Please check yes or no.

- Yes
- No

21. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2012. Enclosed**

Comments

22. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any major obstacles or barriers encountered that you believe may be impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles. Any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida are welcome.

2013 LOCAL COMPETITION DATA REQUEST RESPONSE CHECKLIST

RESPONSE TO DATA REQUEST QUESTIONNAIRE:

Note: For those CLECs NOT providing local telephone services, you may check the box on the cover page and fax it to (850) 413-6392. Since the attached CLEC questionnaire contains questions of a general nature, you may wish to respond to any applicable questions.

Does your response include:

- A CD or diskette containing a Word (.doc) file or a paper hardcopy of the questionnaire along with your written response to each question?

Yes or No	
X	

RESPONSE TO DATA REQUEST TABLES FOR DATA AS OF DECEMBER 31, 2012:

Does your response include:

- A CD or diskette containing an Excel (.xls) file of the data requested in **Tables 1 and 2**, or
- A copy of your 2012 calendar year FCC Form 477?

Yes or No	
X	

If you opt to e-mail or fax your response to us, please e-mail it to compreport@psc.state.fl.us or fax to (850) 413-6392.

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 2013 Local Competition Data Request.

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

3. The access line information submitted with its 2013 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

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 2013 Local Competition Data Request.

Respectfully submitted,



Ralph Dichy
Metropolitan Telecommunications of Florida, Inc. (MetTel)
55 Water Street, 31st Floor
New York, New York 11041
(212) 607-6323 (Tel)
(212) 635-6074 (Fax)
rdichy@mettel.net (Email)

Sworn and subscribed this 20 day of ___ day of March 2013.