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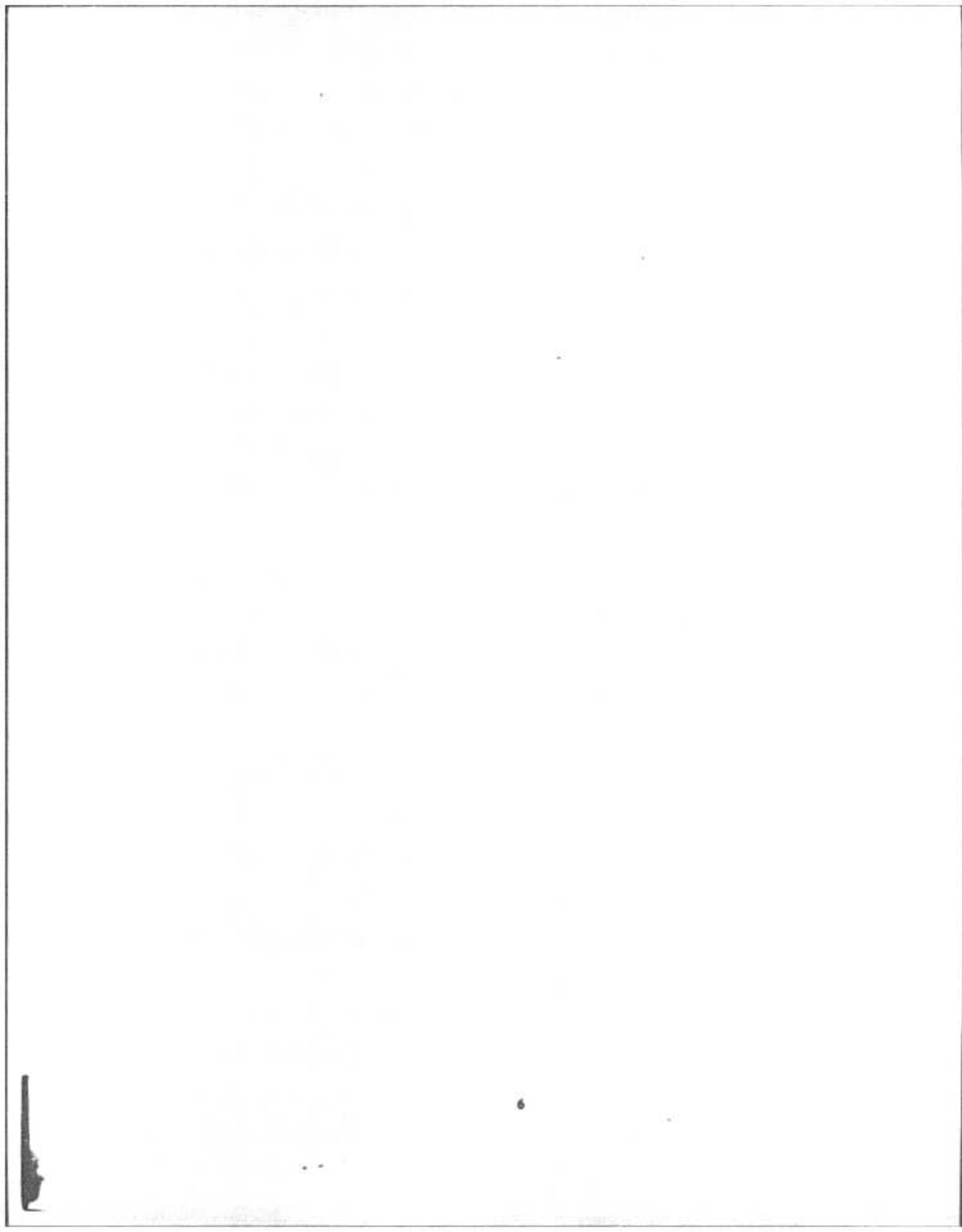
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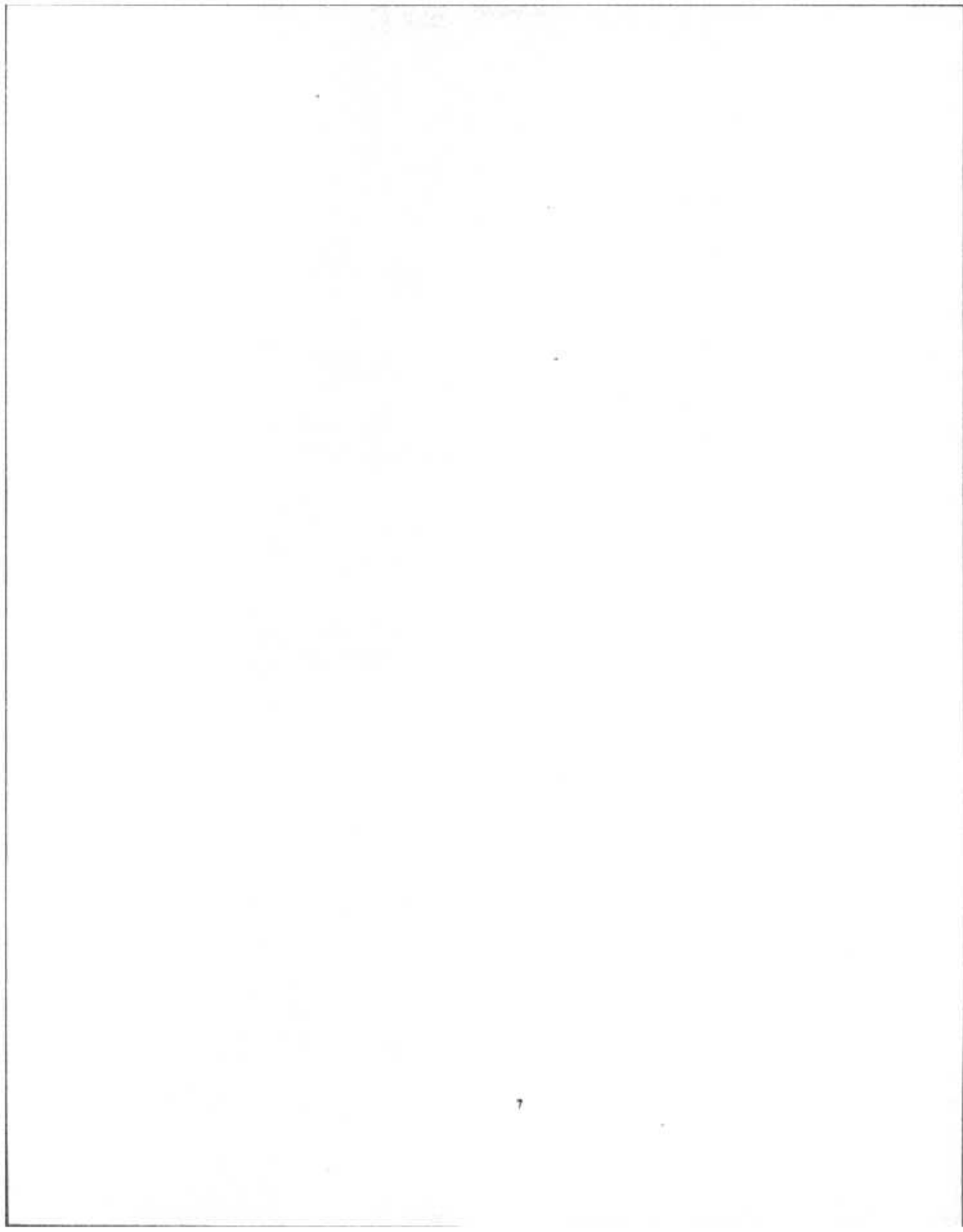
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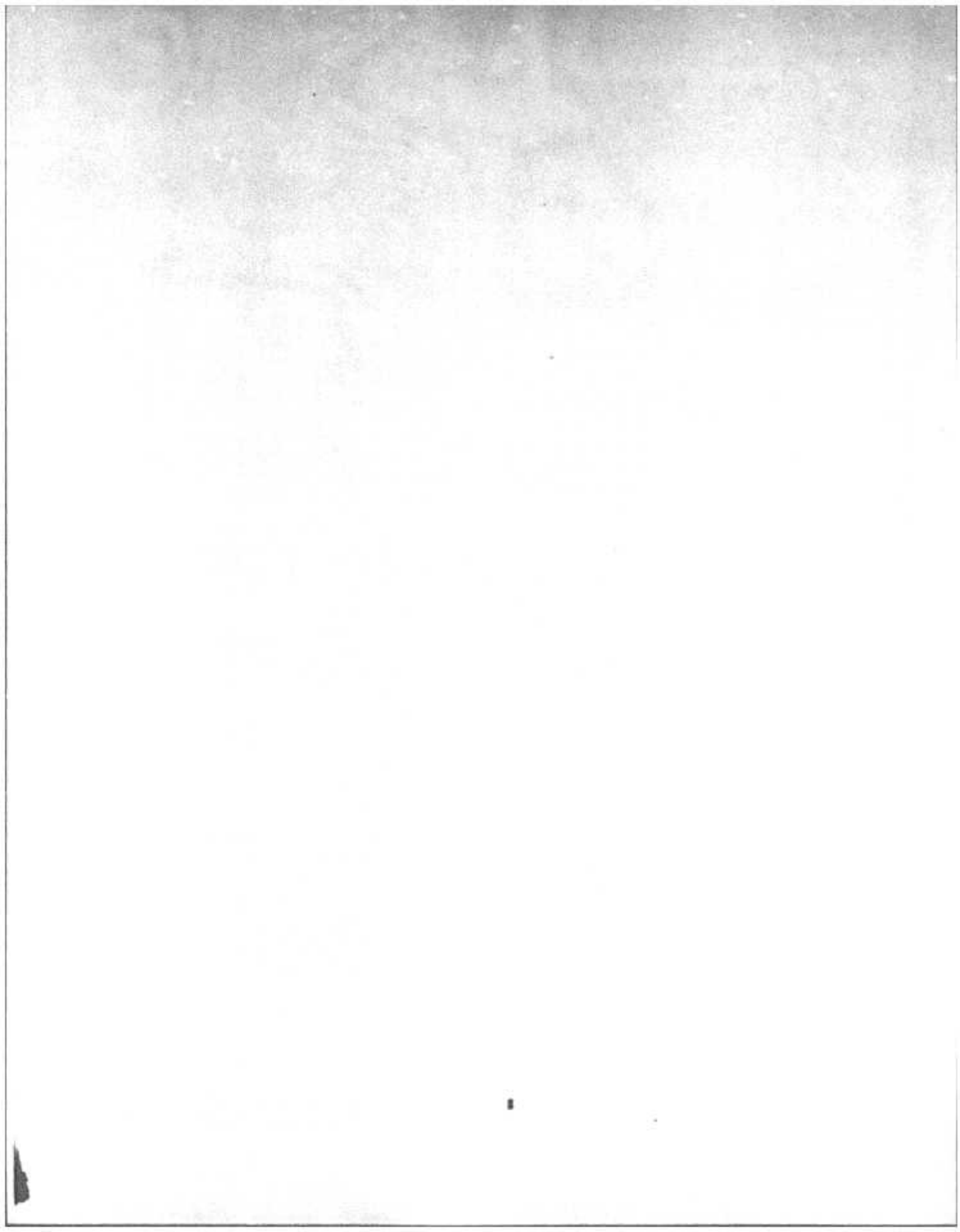
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FLORIDA PSC DOCKET NO 980696-TP

AT&T'S SECOND REQUEST FOR PRODUCTION
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POD NO 17

PROPRIETARY

Redacted

file code: 205.0200

subject: Fixed and Variable Cost Structures

type: Information Letter

date: June 25, 1997

distribution list: See Attachment

related letters:

other: None

to: General Managers - Network
Executive Directors - Network & Technology
Assistant Vice Presidents - Network & Technology
Senior Directors - Network & Technology

entitled: BellSouth Telecommunications, Inc.

from: D. L. King, Executive Director - Infrastructure Planning

description: Provides definition and establishes targets for more variable cost structure deployments

SEARCHED
SERIALIZED
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FILED
JUN 25 1997
FBI - MEMPHIS

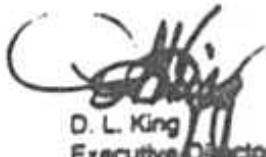
In our current highly competitive marketplace it is important that we take proactive steps to focus our deployment strategy on a more variable, less fixed, cost structure. Obviously we must minimize the amount of Network investment that could potentially be stranded as existing and new customers migrate to competitors in our Region.

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D. L. King
Executive Director - Infrastructure Planning

Attachments (2)

cc: J. R. Gunter
J. L. Strohmeyer

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Definitions

Variable Cost deployments involve plant/facilities that can be implemented gradually over time as the demand for services requiring those facilities materializes. A vital attribute of variable cost structures is that the investment is fungible in that the facilities deployed can be recovered and redistributed as the demand location may shift.

Fixed Cost deployments involve plant/facilities that are basically implemented in full at the first opportunity for service provisioning. Fixed cost deployments offer little fungibility in that once the facilities have been placed there is little or no opportunity to recover and redistribute them to current demand locations.

Examples

Fixed Cost Items

Metallic Cable
Fiber Cable
Poles
Outside Plant Huts and CEVs
Central Office Buildings
Multiplexer Housings/Cabinets
DLC Housings/Cabinets

Variable Cost Items

Multiplexer electronics (Loop and IOF)
Switch Peripherals
DLC Electronics
NGDLC Electronics
HDSL Equipment
DAML Equipment
Fiber Distribution Electronics

ALL COE Investment
- 1990 - 1995 Only

Plug-In COE Investment	Total COE Investment	% Plug-In/Total	ALL Cable & Wire Inv 1990-95	1990-95 Total COE + Cable & Wire Investment	Percent Investment Fixed	Percent Investment Variable	Summary Percent Variable 1990-95
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ALL COE Investment
- 1995 Additions

Plug-In Investment	Total Investment	% Plug-In/Total	ALL Cable & Wire Inv 1995 Additions	Total 1995 COE + Cable & Wire Investment	Percent Investment Fixed	Percent Investment Variable
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file code: 205.0200 RL 97-03-012BT
subject: Digital AML Deployment Directives
type: Deployment Directive
date: May 19, 1997
distribution list: See Attachment
related letters: RL 97-01-012BT, RL 96-07-009BT, RL 96-07-012BT, RL 94-10-030BT,
RL 94-10-006BT
other: None
to: General Managers - Network
Executive Directors - Network & Technology
Assistant Vice Presidents - Network & Technology
Senior Directors - Network & Technology
entities: BellSouth Telecommunications, Inc.
from: D. L. King, Executive Director - Infrastructure Planning
description: Digital AML Deployment Directives

1 In an effort to provide alternative solutions necessary to meet continued increases in Additional
2 Line demand, this letter transmits Digital AML Deployment Directives for two new products.
3 These directives also supersede RL: 94-11-025BT, which provided direction on the deployment of
4 standard

5 BST has worked with [redacted] to develop Digital Loop Electronics (DLE) Digital AML Channel
6 Units for SLC-96 and SLC Series 5 DLC systems, i.e., the UDC-CU96 and MP-CU5, respectively.
7 The Product Approval Letters (RL 96-07-012BT and RL 97-01-012BT) for both channel units have
8 been released, as well as MSPs (RL: 96-07-009BT) which are applicable to both devices. Similar
9 Digital AML plug-in capability for Next Generation Digital Loop Carrier (NGDLC) systems is being
10 investigated by [redacted] and BST. As these products are developed, evaluated, and approved,
11 directives will be issued providing recommendations for their deployment.

12 These new channel units allow provisioning of additional line growth by utilizing Digital AML
13 technology in areas served by SLC-96 and Series 5 digital loop carrier systems, respectively. The
14 UDC-CU96 Channel Unit plugs directly into a SLC-96 remote terminal bank, while the MP-CU5
15 Channel Unit plugs directly into a Series 5 remote terminal bank. Both units multiplex two
16 adjacent channels onto one copper distribution pair. Both units interface with standard POTS
17 channel units at the COT, or directly with the switch in integrated applications. The DLE Digital

AML Channel Units provide all the same features as the standard Digital AML device, with the following exceptions:

- DLE Digital AML plugs do not have a Fail-to-POTS option.
- The Channel Units use programmable signatures in the MLT system to achieve testability. Unique VER codes are returned to the tester to indicate a Digital AML system.

Generally, the deployment of Digital AML (Standard or DLE), in lieu of an Engineering Work Order (EWO), to provide Additional Line service remains economically attractive (Section 3.1 and 3.2). However, the relatively high per line electronics costs for Digital AML prohibit wide scale deployments other than in lieu of an EWO. The attached directives also identify special situations where Digital AML can be used to reduce our overall costs. Examples include:

- a) locations where extenuating circumstances, i.e., buried encapsulated plant, preclude us from performing low cost facility modifications (Section 4.0),
- b) niche applications as a facility relief alternative in very slow growth areas (Section 3.3),
- c) strategic and competitive situations where high Additional Line losses to facility based competitors will offer opportunities to reuse Digital AML equipment at other demand locations. Future penetrations by wireless competitors will be monitored in conjunction with expected price reductions for their equipment. (Section 6.0)

When used in a prudent fashion, Digital AML offers an attractive architecture to reduce costs in these special situations. It also provides an opportunity for us to evolve to a more variable cost structure, particularly in our increasingly competitive marketplace, by allowing us the flexibility to reuse equipment where needed.

Subject Matter Experts for Digital AML are identified, along with an overview of the directives, in the Summary of Digital AML Directives provided on the last page of the attachment. Questions or comments from your staff regarding these directives should be directed to Jim Jackson at (205) 977-5032 or Greg Mims at (205) 977-7294.



D. L. King
Executive Director - Infrastructure Planning

Attachments

cc: J. R. Gunter
D. L. Strohmeier

Digital AML Deployment Directives DISTRIBUTION LIST

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5.0 RESTRICTIONS

5.1 Services Supported by Digital AML

Digital AML will support basic (POTS1) service only, including all CLASS[®] services, FAX and modem lines, CALLER ID, Enhanced CALLER ID, MemoryCall[®], and future Utility Telescopy Service. However, it will not support ISDN or WatchAlert[®] service. WatchAlert[®] service is presently only being offered in Florida.

5.2 Transmission Requirements

Digital AML, either in a Standard Configuration over metallic feeder and distribution facilities, or in a DLE configuration over metallic distribution facilities behind SLC-98 or SLC Series 5, is restricted to 2-wire 1300 ohm Resistance Design loops within the non-loaded range (total non-DLC loop length not to exceed 18 Kft). The loop includes all segments of cable and bridged taps connected to serve a customer premise, including segments in the C.O. and on the customer premise. Refer to Section 11 of the M&Ps, either RL:94-10-008BT (Standard Digital AML) or RL:96-07-009BT (DLE Digital AML), for the Loop Qualification Criteria before deploying Digital AML.

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1 5.3 Specific Restrictions for DLE Digital AML

2 The DLE Digital AML channel units generally provide the same features as Standard
3 Digital AML devices. However, the following exceptions do apply:

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- a) DLE Digital AML channel units do not have a Fail-to-POTS option. In the event of a failure of a Digital AML component in a Standard Digital AML configuration, the Fail-to-POTS feature allows the residence primary line to remain intact. However, in a DLE Digital AML configuration, where the primary and additional lines serve from the same channel unit, the Fail-to-POTS feature is not achievable.
 - b) The DLE Digital AML channel units use programmable signatures in the MLT system to achieve testability. Unique VER codes are returned to the tester to indicate a Digital AML system. Refer to RL-98-07-009BT for more details.

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7.0 REFERENCES

1. RL: 97-01-012BT, January 10, 1997, Product Approval Letter for Raychem Digital AML Channel Unit for SLC Series 5 DLC System Remote Terminal
2. RL: 98-07-012BT, July, 1998, Product Approval Letter for Raychem Digital AML Channel Unit for SLC 98 DLC System Remote Terminal
3. RL: 98-07-009BT, July 31, 1998, Methods and Procedures for the Raychem Digital AML SLC 98 and SLC Series 5 Channel Units
4. UG-AFIG-001BT, Section II, Tab 19, Issue A, June, 1998, FACS Methods and Procedures Users Guide, "Pair Gain (PG) Digital Added Main Line (DAML) FACS Service Order Assignment Procedures."
5. RL: 98-07-033BT, July 21, 1998, Product Approval Letter for the Raychem Miniplax[®] Digital AML DooRT unit
6. RL: 95-02-018BT, February 28, 1995, Digital AML Monitor Report User Guide.
7. RL: 94-10-008BT, December 16, 1994, Methods and Procedures for the Provisioning, Maintenance, and Installation of the Raychem Miniplax[®] Digital AML System.
8. RL: 94-10-030BT, November 30, 1994, Product Approval for the Raychem Miniplax[®] Digital AML System.

Summary of Digital AML Directives

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Installation & Maintenance
LFACS Administration & HAL

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file code: 205.0200

subject: Loop Technology Deployment Directives

type: Deployment Directive

date: September 30, 1996

distribution list: See attached list

related letters: RL:94-03-030BT, RL:95-03-028BT, RL:95-09-014BT, RL:96-09-007BT

to: General Managers - Network Operations
Assistant Vice-Presidents - Network

entities: BellSouth Telecommunications, Inc.

from: Dan L. King, Executive Director - Infrastructure Planning

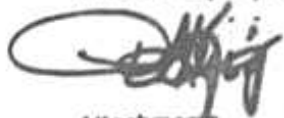
description: 1996 Issue of Loop Technology Deployment Directives

This letter transmits the 1996 issue of the BellSouth Loop Technology Deployment Directives (LTDD). This document supersedes and updates all information previously contained in RL:94-03-030BT, the 1994 issue of the BellSouth Loop Technology Deployment Guideline (LTGG). It also incorporates provisions of previously issued directives concerning loop technology deployment strategies, including:

- | | |
|----------------|---|
| RL:95-03-028BT | NGDLC and TR-303 Loop Deployment Directives |
| RL:95-09-014BT | Fiber Distribution Deployment Directives |
| RL:96-09-007BT | DS1 Technology Deployment Directives |

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Questions or comments from your staff regarding these directives should be directed to Jim Jackson at (205) 977-5032 or Stan Fory at (205) 977-7168.



Attachment:

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September 1998**

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