

ORIGINAL

MEMORANDUM

January 13, 1999

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF LEGAL SERVICES (COX) *WPC NCB*

RE: DOCKET NO. 980696-TP - Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes.

Attached is a **Memorandum to All Parties of Record** to be issued in the above-referenced docket. (Number of pages in memo - 2)

WPC/slh  
 Attachment  
 cc: Division of Communications  
 I:980696me.wpc

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DIVISION OF RECORDS AND REPORTING

STATE OF FLORIDA

Commissioners  
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DIVISION OF LEGAL SERVICES  
NOREEN S. DAVIS  
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**Public Service Commission**

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** January 13, 1999  
**TO:** All Parties of Record  
**FROM:** William P. Cox, Staff Counsel *WPC (wpc)*  
**RE:** Docket No. 980696-TP: Communications Between David Dowds and Brian Staihr

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In an effort to provide full disclosure to all parties of record regarding the compliance filings required in Docket No. 980696-TP by Order No. 99-0068-FOF-TP, issued January 7, 1999, this memorandum will detail discussions between Commission Staff member David Dowds and Sprint-Florida, Inc. (Sprint) witness Dr. Brian Staihr regarding those filings. With the consent of staff counsel and counsel for Sprint, David Dowds contacted Dr. Staihr on December 21, 1998, in an effort to clarify what was expected in the January 12, 1999, compliance filing. It was Staff's understanding that Dr. Staihr would be primarily responsible for making the structural changes to the BCPM 3.1 model that all of the companies would use for their respective compliance filing. Staff felt that this communication was necessary in order to ensure that the compliance filing would be made in an accurate and timely manner consistent with the Commission's Order. It was not and has not been Staff's intention that the Commission's Order be modified in any way through this communication. Furthermore, we believe that by this memorandum we are in full and complete compliance with Rule 25-22.033, Florida Administrative Code, Communications Between Commission Employees and Parties.

In the first call on December 21, 1998, Mr. Dowds contacted Dr. Staihr to clarify the Commission's Order regarding fixing the Minimum Spanning Tree (MST) analysis problem. Specifically, Mr. Dowds conveyed to Dr. Staihr that the Commission's intent was not to inflate unnecessarily cable lengths in all geographic areas by relaxing quadrant =< road mileage; rather, the intent of the structural change to the model is to remedy the shortfall where it is most pronounced, the rural areas.

On December 22, 1998, Mr. Dowds again contacted Dr. Staihr regarding the compliance filing. Dr. Staihr indicated that Sprint was revising the BCPM loop module and would ensure that BellSouth Telecommunications, Inc. (BellSouth) received the revised version of the BCPM 3.1 model. Dr. Staihr also stated that INDETEC would be making the changes to the switching model that would be completed by the next week. Dr. Staihr envisioned that

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BellSouth, GTE Florida, Incorporated (GTEFL), and Sprint would each make a separate filing on January 12, 1999, incorporating the Commission's approved inputs. Mr. Dowds informed Dr. Staihr that Mr. Dowds would contact GTEFL and explain to them what they would need to do for the compliance filing based on this conversation with Dr. Staihr. On that same day, Mr. Dowds contacted GTEFL representative Beverly Menard and also BellSouth representative Nancy Sims to inform them of what was required for the compliance filing.

On January 6, 1999, Mr. Dowds received a call from Dr. Staihr regarding the compliance filing. Dr. Staihr was on the call with two other Sprint representatives, Mr. Dunbar and Mr. Ganz. They noted that when completing the new MST analyses for the compliance filing, they discovered that they had undercounted the amount of backbone cable in their original MST calculations for the BCPM 3.1. BCPM 3.1 has connecting cable entering distribution quadrants, which partially shares structure with backbone cable. Thus, it appears that they did not count the backbone cable associated with the shared structure. In light of this discovery, Dr. Staihr then asked Mr. Dowds what should be filed. Mr. Dowds told Dr. Staihr that he should file a narrative with the complete filing explaining what had happened and showing the correct and incorrect MSTs for the "old" model and the "new" model. Mr. Dowds also told Dr. Staihr that he should file three copies of the CD-ROM required for the compliance filing.

WPC/slh

cc: David Dowds  
Martha Brown

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