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## Florida Cable Telecommunications Association

RECORDS AND REPORTING

Steve Wilkerson, President

## VIA HAND DELIVERY

August 9, 2000

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

RE: Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of page 27 of the Rebuttal Testimony and Exhibits of William J. Barta on behalf of the Florida Cable Telecommunications Association. Page 27 was inadvertently omitted from the testimony filed with the FPSC on July 31, 2000. Please insert this page into the testimony. Copies have been served on the parties of record pursuant to the attached certificate of service by U.S. Mail delivery and electronically.

Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely, APP

ielul a. Thass Michael A. Gross

Vice President, Regulatory Affairs & ECR

Regulatory Counsel

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OTH

SEC Enclosure SER

cc:

All Parties of Record William J. Barta

RECEIVED

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of **page 27** of the Rebuttal Testimony by William Barta on behalf of the Florida Cable Telecommunications Association filed on July 31, 2000, in Docket 990649-TP have been served upon the following parties by U.S. Mail and electronically this 9th day of August, 2000:

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residential customers and 16.30% for business customers. The avoided retail cost discount ordered for GTE is 13.04%. The impact of substituting the Commission-ordered wholesale percentage discount for each carrier's proposed avoided retail costs can be found in Exhibit \_(WJB-2).

- Issue 8: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking non-recurring UNE cost studies?
  - network design; (a)
  - **(b)** OSS design;
  - labor rates; (c)
  - required activities; (d)
  - **(e)** mix of manual versus electronic activities;
  - **(f)** other.

- Q. Did your review of GTE's Wholesale Non-Recurring Cost Study ("NRC Study") find it to be based upon forward-looking practices (Issue 8(e))?
- No, not in all areas. The Company asserts that "[T]he UNE NRC Study is a A. forward-looking study that accounts for the activities required to pre-order, order, provision, and install products and services for Competitive Local Exchange Carriers (CLECs)" (NRC Study, page 13-FL 1). A closer review of the NRC Study, however, indicates that many of the nonrecurring charges to be assessed CLECs requesting unbundled network elements are premised on less efficient, manual ordering and provisioning practices.

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