

**MCWHIRTER REEVES ORIGINAL**  
ATTORNEYS AT LAW

TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602  
P. O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:  
  
TALLAHASSEE

TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

August 21, 2000

RECEIVED-FPSC  
00 AUG 21 PM 4:08  
RECORDS AND REPORTING

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

Re: Docket No.: 990649-TP

Dear Ms. Bayo:

On behalf of Florida Competitive Carriers Association, AT&T, MCI WorldCom, Intermedia and Z-Tel, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Joint Prehearing Statement of Florida Competitive Carriers Association, AT&T, MCI WorldCom, Intermedia and Z-Tel.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Yours truly,

*Joe McGlothlin*

Joseph A. McGlothlin

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP Alida  
COM 5  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG JAM/bae  
OPC Enclosure  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC +  
SER \_\_\_\_\_  
OTH \_\_\_\_\_

RECEIVED & FILED

*[Signature]*  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER: 990649-TP  
DATE: 08/21/00  
TIME: 05:20:11  
PAGE: 1

In re: Investigation into pricing of  
unbundled network elements.

---

Docket No. 990649-TP  
Filed: August 21, 2000

**Joint Prehearing Statement of Florida Competitive Carriers Association,  
AT&T, MCI WorldCom, Intermedia and Z-Tel**

The Florida Competitive Carriers Association (FCCA), AT&T Communications of the Southern States, Inc. (AT&T), MCI WorldCom, Inc. (MCIW), Intermedia Communications, Inc. (Intermedia), and Z-Tel Communications, Inc. (Z-Tel), pursuant to Order No. PSC-00-2015-PCO-TP, issued on June 8, 2000, jointly file their Prehearing Statement.

**Preliminary Statement**

As the Commission is aware, BellSouth very recently distributed numerous modifications to its model. At the time this Prehearing Statement is being prepared, FCCA, AT&T, MCIW, Intermedia, and Z-Tel have not had an adequate opportunity to assess either the changes or related testimony. Accordingly, these parties reserve the right to modify the positions stated herein as necessary to protect their interests.

**A. APPEARANCES:**

JOSEPH A. MCGLOTHLIN and VICKI GORDON KAUFMAN, McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A., 117 South Gadsden Street, Tallahassee, Florida 32301. (Attorneys for Florida Competitive Carriers Association)

JAMES LAMOUREUX, 1200 Peachtree Street, Suite 1200, Atlanta, Georgia 32309  
and

FLOYD R. SELF, Messer, Caparello and Self, Post Office Box 1876, Tallahassee, Florida 32302  
(Attorneys for AT&T Communications of the Southern States, Inc.)

DONNA CANZANO MCNULTY, MCI WorldCom, Inc. 325 John Knox Road, The Atrium Building-Suite 105, Tallahassee, Florida 32303

DOCUMENT NUMBER DATE

10250 AUG 21 8

FPC00-2015-PCO-TP-REPORTING 005532

and

RICHARD D. MELSON, Hopping Green Sams & Smith, P.A., Post Office Box 6526, Tallahassee, Florida 32314. (Attorneys for MCI WorldCom, Inc.)

SCOTT A. SAPPERSTEIN, Sr. Policy Counsel, Intermedia Communications, Inc., 3625 Queen Palm Drive, Tampa, Florida 33619. (Attorney for Intermedia Communications, Inc.)

JONATHAN E. CANIS and MICHAEL HAZZARD, Kelley Drye & Warren, LLP, 1200 Nineteenth Street N.W., Fifth Floor, Washington, DC 20036. (Attorneys for Z-Tel Communications, Inc.)

**B. WITNESSES:**

**On Behalf of the Florida Competitive Carriers Association:**

<u>Witness</u>	<u>Issue</u>
Joseph Gillan	1, 12

**On Behalf of AT&T and MCIW:**

<u>Witness</u>	<u>Issue</u>
Greg Darnell	7(t), 7(u), 2(a)
John C. Donovan and Brian F. Pitkin	1, 7(a), 7(e,f,g,h,i,j,k,l,m,n,s), 8
Brenda J. Kahn	4
Jeffrey King	8, 9(a), 10, 11, 12
Catherine E. Pitts	7(o)

**On Behalf of Intermedia:** None

**On Behalf of Z-Tel:**

<u>Witness</u>	<u>Issue</u>
Dr. George S. Ford	1, 7(o)

**C. EXHIBITS:**

**On Behalf of the Florida Competitive Carriers Association:**

Joseph Gillan

- JPG-1 Figure 1: The Longer the Analytical Period, the More Inputs are Included in a Forward Looking Analysis
- JPG-2 Table 1: Status of UNE-based Competition in Florida  
Table 2: Growth in UNE Loops and ILEC Lines  
Table 3: The Status of UNE-Based Competition in New York

**On Behalf of AT&T and MCIW:**

Greg Darnell

- GJD-1 Rebuttal Testimony of Walter S. Reid
- GJD-2 Calculations to Determine Indirectly Avoided Retail Cost Amount
- GJD-3 Revised Expense Development Factors and Revised Shared and Common Cost Factors
- GJD-4 Analysis of BellSouth Plant Specific Expense Factors
- GJD-5 Calculations Used to Determine Total Monthly Cost for a 2-Wire Loop System
- GJD-6 USOA's Trend Analysis
- GJD-7 BellSouth Corporate Operations Expense
- GJD-8 BellSouth Deaveraging Analysis
- GJD-9 BellSouth Deaveraging Summary
- GJD-10 Response to AT&T Interrogatories 28, 29, 30, 32 & 35
- GJD-11 Gregory J. Darnell Professional Experience

John C. Donovan and Brian F. Pitkin

- JCD-BFP-1 John C. Donovan Professional Experience
- JCD-BFP-2 Curriculum Vitae of Brian F. Pitkin
- JCD-BFP-3 Table: Number of DLC's
- JCD-BFP-4 Table: Annual Nominal Cost of Capital v. Real Cost of Capital
- JCD-BFP-5 Graph: Annuity Nominal Cost of Capital v. Real Cost of Capital

- JCD-BFP-6 Table: Nominal Cost of Capital Plus Inflation for Material and Labor
- JCD-BFP-7 Chart: Nominal Cost of Capital v. Nominal Cost of Capital Plus Inflation
- JCD-BFP-8 DLC In Plant Factor Development
- JCD-BFP-9 Comparison of Installed DLCRT & COT Investments by Vendor
- JCD-BFP-10 Regression to Determine Aerial DTBT Inputs
- JCD-BFP-11 BellSouth's Inputs and Modified Inputs
- JCD-BFP-12 Map with Central office
- JCD-BFP-13 Map with BSTLM Original Routing and Map of Alternative Routing with Splitting
- JCD-BFP-14 Map of BSTLM Drop Routing and Map of Correct Drop Routing
- JCD-BFP-15 Chart: DLC In Plant Factor Development

Brenda J. Kahn

- BK-1 Scenario A: "25 Pair Terminal" Scenario
- BK-2 Single Point of Interconnection Scenario

Jeffrey King

- JAK-1 BellSouth Cost Calculator 2.3: Element Summary Report Comparison of BellSouth and AT&T Proposed Rates (Revised)
- JAK-2 Element Summary Report Comparison of AT&T and GTE Proposed Rates (Revised)
- JAK-3 Table: BST Default

Catherine E. Pitts

- CEP-1 BellSouth's Response to ATT's 2nd Set of Interrogatories, Item #87
- CEP-2 3 pages, all confidential
- CEP-3 POD #6
- CEP-4 1 page, all confidential
- CEP-5 POD #141, Attachment No. 1
- CEP-6 POD #14
- CEP-7 ATT Item #89
- CEP-8 2 pages, all confidential

**On Behalf of Intermedia:** None

**On Behalf of Z-Tel:** None

**D.E.F. STATEMENT OF ISSUES AND POSITIONS**

Statement of General Position

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

Only by establishing rates for unbundled network elements that are based on appropriate economic costs can the Commission provide the framework for meaningful competition in the local market in Florida. In this proceeding BellSouth has proffered a new cost model that, as a consequence of improved methods in such areas as customer locations and road networks, generally "builds" a network requiring far fewer materials than did its prior model. In this respect the model itself is an improvement. Yet, counterintuitively, the overall costs claimed by BellSouth in this case--and the UNE rates proposed by BellSouth--are similar to the very high costs and rates proffered by BellSouth in the past. An analysis explains this paradox. BellSouth has artificially inflated the network costs by injecting into its new model a myriad of unrealistic, inappropriate, and inefficient assumptions, methods, factors and inputs. Even though BellSouth prevented parties from accessing all areas of the model necessary to accomplish all needed reforms, witnesses representing ALECs have made and substantiated many corrections that reveal the extent of BellSouth's excesses and that translate into prices for UNEs that are significantly lower than those proposed by BellSouth.

Issue 1:

What factors should the Commission consider in establishing rates and charges for UNEs (including deaveraged UNEs and UNE combinations)?

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

The Commission should focus on the forward-looking costs that would be incurred by the ILEC when an ALEC obtains an unbundled network element or combination of such elements. Forward-looking costs are the best measurement of the relevant and pertinent costs that an ILEC incurs to provide a UNE, because those are the only costs that affect future decisions. Use of embedded costs would violate accepted economic theory, overstate UNE prices and impede competition. With respect to combinations, BellSouth's concept of "full market value" is another attempt at abandoning cost-based pricing. BellSouth's proposal to set combination rates equal to the value of its retail services would cripple the development of competition and would fail to meet the requirement of the Act to establish forward-looking cost-based UNE rates. The Commission should combine the forward-looking cost methodology it has historically embraced, the experience it has gained since the early arbitrations, and the better data that has become available since then to set cost-based UNE rates that will promote the development of local competition in Florida.

Issue 2(a): What is the appropriate methodology to deaverage UNEs and what is the appropriate rate structure for deaveraged UNEs?

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

The requirement that a UNE rate be based on forward-looking costs is applicable to all UNE rates, including deaveraged rates. Accordingly, the Commission should select a methodology that focuses solely on identified geographical differences between forward-looking costs. BellSouth's

proposal fails this criterion. BellSouth proposes to stratify wire centers on the basis of its common retail rate groups, and then calculate the average costs of the wire centers in each resulting group. However, areas used for retail service often include both low cost and high cost areas. Accordingly, this method of dividing geographic areas would place greater emphasis on consistency of retail revenues than on differences in economic costs.

The Commission should prescribe a minimum of three geographical areas within the service area of each ILEC that would be differentiated on the basis of variances in forward-looking economic costs.

Issue 2(b): For which of the following UNEs should the Commission set deaveraged rates?

- (1) loops (all);
- (2) local switching;
- (3) interoffice transport (dedicated and shared);
- (4) other (including combinations)

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

The rates for all loops of every type should be deaveraged.

Issue 3(a): What are xDSL capable loops?

3(b): Should a cost study for xDSL-capable loops make distinctions based on loop length and/or the particular DSL technology to be deployed?

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel** adopt the positions of Covad, BlueStar, and Rhythms Links as their positions on Issues 3(a) and 3(b).



Issue 4(a): Which subloop elements, if any, should be unbundled in this proceeding, and how should prices be set?

**FCCA, AT&T, MCIW, Intermedia and Z-Tel:**

The following sub-loop elements must be unbundled:

**Sub-Loops**

- Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop
- Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop
- Sub-Loop Distribution Per 4-Wire Analog Voice Grade Loop
- Network Interface Device Cross Connect
- 2-Wire Intrabuilding Network Cable
- 4-Wire Intrabuilding Network Cable
- Sub-Loop - Per Cross Box Location - CLEC Feeder Facility Set-Up
- Sub-Loop - Per Cross Box Location - Per 25 Pair Panel Set-Up
- Sub-Loop - Per Building Equipment Room - CLEC Feeder Facility Set-Up
- Sub-Loop - Per Building Equipment Room - Per 25 Pair Panel Set-Up
- Sub-Loop - Per Cross Box Location - CLEC Distribution Facility Set-Up
- Sub-Loop - Per Building Equipment Room - CLEC Distribution Facility Set-Up
- Sub-Loop - Per 2-Wire Analog Voice Grade Loop SL2/Feeder Only
- Sub-Loop - Per 4-Wire Analog Voice Grade Loop/Feeder Only
- Sub-Loop - Per 2-Wire ISDN Digital Grade Loop/Feeder Only
- Sub-Loop - Per 4-Wire 56 or 64 Kbps Digital Grade Loop/Feeder Only
- Sub-Loop - Per 2-Wire Copper Loop short/feeder Only
- Sub-Loop - Per 4-Wire Copper Loop short/feeder only
- Sub-Loop - Per 2-Wire Copper Loop short/distribution only
- Sub-Loop - Per 4-Wire Copper Loop short/distribution only
- Network Interface Device - 2 line
- Network Interface Device - 6 line

**Loop Channelization and CO Interface (inside Central Office)**

- Unbundled Loop Concentration - System A (TR008)
- Unbundled Loop Concentration - System B (TR008)
- Unbundled Loop Concentration - System A (TR303)
- Unbundled Loop Concentration - System B (TR303)
- Unbundled Loop Concentration - DS1 Line Interface Card
- Unbundled Loop Concentration - POTS Card
- Unbundled Loop Concentration - ISDN (Brite Card)
- Unbundled Loop Concentration - SPOTS Card
- Unbundled Loop Concentration - Specials Card
- Unbundled Loop Concentration - TEST CIRCUIT Card

**Concentration per system per feature activated (outside Central Office)**

Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data

Unbundled Loop Concentration - System A (TR008)

Unbundled Loop Concentration - System B (TR008)

Unbundled Loop Concentration - System A (TR303)

Unbundled Loop Concentration - System B (TR303)

Unbundled Sub-Loop Concentration - USLC Feeder Interface

Unbundled Loop Concentration - POTS Card

Unbundled Loop Concentration - ISDN (Brite Card)

Unbundled Loop Concentration - SPOTS Card

Unbundled Loop Concentration - Specials Card

Unbundled Loop Concentration - TEST CIRCUIT Card

Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data

**Unbundled Terminating Wire**

Unbundled Network Terminating Wire (NTW) per Pair

Issue 4(b): How should access to such subloop elements be provided, and how should prices be set?

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel to 4(a) and 4(b):**

As the FCC has recognized, access to subloop elements is likely to be the catalyst that will allow competitors to deploy complementary facilities and, eventually, to develop competitive loops.

With respect to intrabuilding network cable (riser) and network terminating wire, BellSouth proposes charges based on a means of access that violates the FCC's UNE remand order. Despite the fact that the order calls for a single point of interconnection, BellSouth's calculation assumes BellSouth would install duplicative facilities that would be used only by ALECs, then require cross connections to BellSouth's existing cross connect device. Imposing the cost of additional equipment on new entrants is not competitively neutral. It is unnecessary in view of arrangements—such as appropriate indemnification requirements—that can satisfy any concerns for network security. BellSouth must provide a single point of interconnection, and the Commission should establish the

UNE price that corresponds to this less costly means of interconnection.

Issue 7: What are the appropriate assumptions and inputs for the following items to be used in the forward-looking recurring UNE cost studies?

(A) network design (including customer location assumptions);

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

Many of the numerous faulty methodologies, inputs, and assumptions employed by BellSouth that overstate the costs calculated by the BSLTM relate to network design. For instance, BellSouth modeled three different scenarios: "Combo," "All Copper," and "BST2000." BellSouth should have directed its model to construct a single network that estimates the forward-looking costs using existing technology. The Commission should utilize only the Combo scenario, which employs integrated digital loop carrier and a mix of copper and fiber facilities. The "all copper" scenario would be impractical in the real world and would artificially inflate the cost of a copper loop. Further, it is not necessary to assume an all-copper network to study unbundled copper loops (the sole purpose to which BellSouth applied the scenario); the Combo scenario can be used for that purpose. The BST 2000 scenario should be rejected because it assumes a network that requires three separate conversions (analog-to-digital, then to analog at the switch, and back to digital) at different points in the network, instead of a single analog to digital conversion at the remote terminal. This assumption is inefficient and unrealistic in an era in which the digital switches can be and are integrated with the digital loop carrier (as they are assumed to be in the "Combo" scenario) and in which the new entrants' networks will be all digital. The assumption can only increase UNE prices artificially.

In addition, BellSouth's loop length inputs do not reflect efficient network construction. To arrive at the most economical network, the inputs to the model should include a maximum loop length of 16,800 feet on 26-gauge copper, and extended range line cards above 13,000 feet.

The BSLT fails to employ the appropriate minimum spanning road tree when "constructing" DLC. Instead, the model mistakenly relies on the same MSRT used to develop the feeder network. As a result, the model may artificially restrict the number of customers that can be served by a single DLC., thereby overstating costs.

Another flaw separately overstates the cost of DLC equipment. The data provided in the model indicates that BellSouth obtains DLC equipment from two vendors. One of the vendors is more expensive than the other for large DLCs, but less expensive for small DLCs. The cost-effective modeling approach would be to assume that all small DLC facilities are purchased from one vendor and all large DLCs from the other. Instead, BellSouth inappropriately assumed a "mix" of large and small facilities purchased from each. Therefore, BellSouth failed to assume the most cost-efficient investment in DLC facilities.

In designing the network BellSouth erroneously assumed a "rectilinear" or "perpendicular" drop pattern, i.e. a pattern that assumes the service drop will follow the perimeter of the lot and then approach the residence at a right angle, when in fact the drop typically and more efficiently runs from the lot corner to the NID. The impact of the inappropriate assumption was to inflate the amount of investment in drops by 21.7%. (BellSouth's latest filing purports to address this problem; the above parties have not had an opportunity to evaluate the attempt.)

The overall impact of these errors in network design is to artificially bloat the investment associated with the network. When these errors are corrected, corresponding UNE rates are reduced

significantly.

(E) structure sharing

(F) structure costs

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

Structure sharing and structure costs should be explicitly calculated in BellSouth's model. Instead, BellSouth derived values based on the application of various "factors" to prior values. This "factor approach" distorts costs, because of the inherently arbitrary and inaccurate nature of the factors applied.

(G) fill factors

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

In its model, BellSouth assumed that each household would receive an average of 2 copper pairs. In its USF order, issued in Docket No. 980696-TP, the Commission determined that the appropriate assumption should instead be an average of 1.5 pairs. This assumption should be employed in this case.

In addition, as a general matter, where increased activity can be accommodated with additional line cards, there is no need to install large amounts of extra capacity. For this reason, the fill factors applicable to central office terminal equipment should change from 80% to 90%, and the fill factor for remote terminals should increase from 70% to 90%.

(I) fiber cable (material and placement costs);

(J) copper cable (material and placement costs);

(K) drops:

(L) network interface devices

(N) terminal costs

**Consolidated response of FCCA, AT&T, MCIW, Intermedia, and Z-Tel to (I), (J), (K), (L), and (N):**

The BSLT inflates the cost of these facilities by double counting the effects of inflation. The application of a nominal cost of capital takes inflation into account. "Updating", as BellSouth proposes, takes the same effect into account a second time. Further, with respect of each of these categories, BellSouth's approach was to apply "factors" to base amounts as a substitute for direct inputs for engineering and installation costs. To correct for the effect of arbitrary and inappropriate "factors," the Commission should employ the specific unit costs that it developed in Docket No.980696-TP (USF).

(M) digital loop

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

BellSouth also applied the "factor" approach to the quantification of digital loop investment. In this instance, no direct correlation can be made to unit costs developed in the USF docket. Accordingly, the Commission should examine BellSouth's specific assumptions and conclude that the factor applied to digital loop is overstated. The above parties support the more appropriate engineering and installation factor developed by witnesses Donovan and Pitkin.

(O) switching costs and associated variables:

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

BellSouth's proposed switching prices are severely overstated, as the result of the following significant flaws.

Switch vendors apply a higher discount to the list price of new switches than to "growth" or

add-on equipment. When calculating the cost of switches BellSouth melded these discounts in a way that caused it to "purchase," for purposes of the modeling, a majority of lines at the higher prices associated with "growth" or add-on equipment. In fact, BellSouth purchases most lines at the lower "new switch" price. If translated into UNE prices, the inappropriate discount would cause BellSouth to overrecover from ALECs the cost of the switch component of UNE-P at the same time it would create an obstacle to competition. The contract discounts for new switches should be used throughout the switch study. Correcting the discounts reduces BellSouth's claimed investment in ports by 50% and reduces the costs of local switching by 40%. In addition:

Critical investment and capacity errors in BellSouth's feature hardware study caused feature costs to be seriously inflated;

BellSouth's overly simplistic averaging of widely disparate, and often wrong, inputs to arrive at one feature category input produced inaccurate results;

The Simplified Switching Tool that BellSouth developed to produce switch element investments is rife with errors and faults, and should be rejected.

Corrections to these errors are reflected in the switching prices contained in Exhibit \_\_ (JAK-1, revised).

(T) expenses;

(U) common costs

**Consolidated response of FCCA, AT&T, MCIW, Intermedia, and Z-Tel to (T) and (U):**

A review of its submission reveals that BellSouth has overstated these significant expenses in several ways:

(1) BellSouth failed to remove at least \$223,376,929 of avoided retail expense contained in

overhead and support accounts:

(2) BellSouth applied a very low productivity factor of 3.1% to forecast its expense, when the last productivity factor approved for BellSouth by the FCC was 6.5%;

(3) BellSouth's proposed UNE rates would recover the same land, building, and power expense twice;

(4) BellSouth used plant-specific expense factors that increase as a percent of investment, at a time when the industry is experiencing decreasing expense-to-investment ratios.

These errors have the effect of inflating the UNE prices that are produced by the application of BellSouth's model. The effect of the errors has been corrected in the UNE prices proposed in Exhibit \_\_\_(JAK-1, revised).

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?

(A) network design

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

See 7(A) above

(B) OSS design

(E) mix of manual versus electronic activities;

**Consolidated response of FCCA, AT&T, MCIW, Intermedia, and Z-Tel to (B) and (E):**

For purposes of costing UNEs, the model should assume that each UNE is capable of being ordered either electronically or manually.

(C) labor rates—No position



(D) required activities

**FCCA, AT&T, MCIW, Intermedia, and Z-Tel:**

BellSouth forms certain "intermediary" work groups which do not get involved in BellSouth's own retail activities. ALECs should not be required to pay for the cost of such groups through UNE prices.

Issue 9(A): What are the appropriate recurring rates (averaged or deaveraged as the case may be) and non-recurring charges for each of the following UNEs?

- (1) 2-wire voice grade loop;
- (2) 4-wire analog loop;
- (3) 2-wire ISDN/IDSL loop;
- (4) 2-wire xDSL-capable loop;
- (5) 4-wire xDSL-capable loop;
- (6) 4-wire 56 kbps loop;
- (7) 4-wire 64 kbps loop;
- (8) DS-1 loop;
- (9) high capacity loops (DS3 and above);
- (10) dark fiber loop;
- (11) subloop elements (to the extent required by the Commission in Issue 4);
- (12) network interface devices;
- (13) circuit switching (where required);
- (14) packet switching (where required);

- (15) shared interoffice transmission;
- (16) dedicated interoffice transmission;
- (17) dark fiber interoffice facilities;
- (18) signaling networks and call-related databases;
- (19) OS/DA (where required).

Issue 10: What is the appropriate rate, if any for customized routing?

Issue 11: What is the appropriate rate if any, for line conditioning, and in what situations should the rate apply?

Issue 12: Without deciding the situations in which such combinations are required, what are the appropriate recurring and non-recurring rates for the following UNE combinations:

"UNE platform" consisting of: loop (all), local (including packet ,where required) switching (with signaling), and dedicated and shared transport (through and including local termination);

"extended links," consisting of:

- (1) loop, DSO/1 multiplexing, DS1 interoffice transport;
- (2) DS1 loop, DS1 interoffice transport;
- (3) DS1 loop, DS1/3 multiplexing, DS3 interoffice transport.

**Consolidated response of FCCA, AT&T, MCIW, Intermedia, and Z-Tel to Issues 9(a), 10, 11, and 12:**

The appropriate UNE prices are those proposed by AT&T/MCI witness King on Exhibit

\_\_\_(JAK-1, as revised). An excerpt from the exhibit, showing the UNE prices supported by these parties, is attached.

**G. STIPULATED ISSUES:**

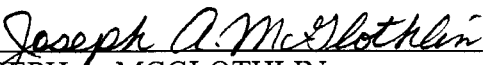
None at this time.

**H. PENDING MOTIONS:**


None.

**I. STATEMENT OF ANY REQUIREMENT WITH WHICH PARTIES ARE UNABLE TO COMPLY:**

None.

  
\_\_\_\_\_  
JOSEPH A. MCGLOTHLIN  
VICKI GORDON KAUFMAN  
McWhirter, Reeves, McGlothlin, Davidson  
Decker, Kaufman, Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301

Attorneys for Florida Competitive  
Carriers Association

  
\_\_\_\_\_  
DONNA C. MCNULTY  
325 John Knox Road  
The Atrium Building  
Suite 105  
Tallahassee, Florida 32303

Attorney for MCI

*Joseph A. McElotkin for*  
ELOYD R. SELF

Messer, Caparelo and Self  
Post Office Box 1876  
Tallahassee, Florida 32302

Attorney for AT&T

*Joseph A. McElotkin for*  
SCOTT SAPPERSTEIN

3625 Queen Palm Drive  
Tampa, Florida 33619

Attorney for Intermedia Communications, Inc.

*Joseph A. McElotkin for*  
MICHAEL HAZZARD

Kelly Drye & Warren, LLP  
1200 Nineteenth Street N.W.  
Fifth Floor  
Washington DC 20036

Attorney for Z-Tel Communications, Inc.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Joint Prehearing Statement of Florida Competitive Carriers Association, AT&T, MCI, Intermedia and Z-Tel has been furnished by U. S. Mail this 21st day of August 2000, to:

(\*)Beth Keating  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Jeffrey Wahlen  
Ausley Law Firm  
Post Office Box 391  
Tallahassee, Florida 32301

Nancy B. White  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Jeremy Marcus  
Blumenfeld & Cohen  
1615 M. Street, N.W., Suite 700  
Washington, DC 20036

Eric J. Branfman and Morton J. Posner  
Swidler Berlin Shereff Friedman, LLP  
3000 K. Street, NW, Suite 300  
Washington, D.C. 20007-5116

Catherine Boone  
Covad Communications Company  
Ten Glenlake Parkway  
Suite 650  
Atlanta, Georgia 30328

James Falvey  
e.spire Communications  
133 National Business Parkway  
Suite 200  
Annapolis Junction, MD 20701

Norman H. Horton, Jr.  
Messer, Caparello & Self, P.A.  
215 South Monroe Street, Suite 701  
Tallahassee, Florida 32302-1876

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable  
Telecommunications Assoc.  
310 North Monroe Street  
Tallahassee, FL 32301

Kimberly Caswell  
GTE Florida Incorporated  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110

Richard Melson  
Hopping, Green, Sams & Smith, PA  
P.O. Box 6526  
Tallahassee, FL 32314

Norman Horton, Jr.  
Post Office Box 1876  
Tallahassee, Florida 32302

Glenn Harris  
North Point Communications, Inc.  
222 Sutter Street, 7th Floor  
San Francisco, CA 94108

Stephen P. Bowen  
Blumfield & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111

TCG South Florida  
c/o Kenneth Hoffman  
Rutledge Law Firm  
Post Office Box 551  
Tallahassee, Florida 32302

Peter Dunbar  
Pennington, Moore, Wilkinson, Bell &  
Dunbar, P.A.  
Post Office Box 10095  
Tallahassee, Florida 32302

Andrew Isar  
Telecommunications Resellers Assoc.  
4312 92nd Avenue, N.W.  
Gig Harbor, WA 98335

Laura L. Gallagher  
Laura L. Gallagher, P.A.  
101 East College Avenue, Suite 302  
Tallahassee, Florida 32301

Charles J. Rehwinkel  
Sprint-Florida, Incorporated  
P.O. Box 2214  
Tallahassee, FL 32316-2214

Angela Green, General Counsel  
Florida Public Telecommunications Assoc.  
125 S. Gadsden Street, Suite 200  
Tallahassee, Florida 32301-1525

John Kerkorian  
5607 Glenridge Drive  
Suite 310  
Atlanta, Georgia 30342

Bruce May  
Holland Law Firm  
Post Office Drawer 810  
Tallahassee, Florida 32302

Mark E. Buechele  
Koger Center  
Ellis Building  
Suite 200  
1311 Executive Center Drive  
Tallahassee, Florida 32301-5027

Russell M. Blau  
Marc B. Rothschild  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW  
Suite 300  
Washington, DC 20007-5116

Jon C. Moyle, Jr., Esquire  
Cathy M. Sellers, Esquire  
Moyle, Flanigan, Katz, Kolins, Raymond  
& Sheehan, P. A.  
The Perkins House  
118 N. Gadsden Street  
Tallahassee, Florida 32301

Rodney L. Joyce  
Shook, Hardy & Bacon, LLP.  
600 14th Street, N.W.  
Suite 800  
Washington, D.C. 20005-2005

  
Joseph A. McGlothlin



005554

A		B					C	D	E	F	G	H	I	J	K	L	M	N	O
Cost Element	Description												AT&T & MCI WorldCom Proposed						
													Recurring	Non recurring	Non-Recurring				
															First	Additional	Initial	Subsequent	
71	Zone 4												\$8.00						
72	Zone 5												\$11.74						
73	Zone 6												\$18.58						
74	A.2.23	Sub-Loop - Per 2-Wire Analog Voice Grade Loop SL2 / Feeder Only - Disconnect Only													\$35.19	\$8.93			
75	A.2.24	Sub-Loop - Per 4-Wire Analog Voice Grade Loop / Feeder Only											\$11.82		\$50.00	\$24.81			
76	Zone 1												\$7.90						
77	Zone 2												\$11.05						
78	Zone 3												\$13.63						
79	Zone 4												\$20.91						
80	Zone 5												\$30.71						
81	Zone 6												\$48.60						
82	A.2.24	Sub-Loop - Per 4-Wire Analog Voice Grade Loop / Feeder Only - Disconnect Only													\$41.98	\$15.19			
83	A.2.25	Sub-Loop - Per 2-Wire ISDN Digital Grade Loop / Feeder Only											\$6.96		\$44.38	\$19.32			
84	Zone 1												\$4.65						
85	Zone 2												\$6.51						
86	Zone 3												\$8.02						
87	Zone 4												\$12.31						
88	Zone 5												\$18.08						
89	Zone 6												\$28.62						
90	A.2.25	Sub-Loop - Per 2-Wire ISDN Digital Grade Loop / Feeder Only - Disconnect Only													\$34.87	\$8.76			
91	A.2.29	Sub-Loop - Per 4-Wire 56 or 64 Kbps Digital Grade Loop / Feeder Only											\$13.18		\$50.75	\$25.40			
92	Zone 1												\$8.80						
93	Zone 2												\$12.32						
94	Zone 3												\$15.19						
95	Zone 4												\$23.32						
96	Zone 5												\$34.24						
97	Zone 6												\$54.19						
98	A.2.29	Sub-Loop - Per 4-Wire 56 or 64 Kbps Digital Grade Loop / Feeder Only - Disconnect Only													\$42.56	\$15.57			
99	A.2.30	Sub-Loop - Per 2-Wire Copper Loop Short / Feeder Only											\$4.04		\$50.03	\$23.59			
100	Zone 1												\$2.70						
101	Zone 2												\$3.78						
102	Zone 3												\$4.66						
103	Zone 4												\$7.15						
104	Zone 5												\$10.50						
105	Zone 6												\$16.61						
106	A.2.30	Sub-Loop - Per 2-Wire Copper Loop Short / Feeder Only - Disconnect Only													\$38.75	\$10.87			
107	A.2.32	Sub-Loop - Per 4-Wire Copper Loop Short / Feeder Only											\$9.57		\$56.30	\$29.86			
108	Zone 1												\$6.39						
109	Zone 2												\$8.95						
110	Zone 3												\$11.03						
111	Zone 4												\$16.93						
112	Zone 5												\$24.86						
113	Zone 6												\$39.35						
114	A.2.32	Sub-Loop - Per 4-Wire Copper Loop Short / Feeder Only - Disconnect Only													\$46.94	\$18.49			
115	A.2.40	Sub-Loop - Per 2-Wire Copper Loop Short / Distribution Only											\$3.89		\$28.14	\$10.10			
116	Zone 1												\$2.60						
117	Zone 2												\$3.64						
118	Zone 3												\$4.48						
119	Zone 4												\$6.88						
120	Zone 5												\$10.11						
121	Zone 6												\$15.99						
122	A.2.40	Sub-Loop - Per 2-Wire Copper Loop Short / Distribution Only - Disconnect Only													\$25.86	\$5.01			
123	A.2.42	Sub-Loop - Per 4-Wire Copper Loop Short / Distribution Only											\$3.96		\$31.02	\$12.99			
124	Zone 1												\$2.65						
125	Zone 2												\$3.70						
126	Zone 3												\$4.56						
127	Zone 4												\$7.01						
128	Zone 5												\$10.29						
129	Zone 6												\$16.28						
130	A.2.42	Sub-Loop - Per 4-Wire Copper Loop Short / Distribution Only - Disconnect Only													\$29.80	\$8.51			
131	A.2.44	Network Interface Device (NID) - 2 line													\$61.60	\$47.17			
132	A.2.45	Network Interface Device (NID) - 6 line													\$104.28	\$89.85			



05555

A		B					C	D	E	F	G	H	I	J	K	L	M	N
1																		
2																		
3	Study Name:	Florida Docket No 990649-TP																
4	State:	Florida																
5																		
6																		
7	Cost Element	Description												AT&T & MCI WorldCom Proposed				
8													Recurring	Non recurring	First	Additional	Initial	Subsequent
133																		
134	A.3	LOOP CHANNELIZATION AND CO INTERFACE (INSIDE CO)																
135	A.3.12	Unbundled Loop Concentration - System A (TR008)											\$164.19		\$0			
136	A.3.13	Unbundled Loop Concentration - System B (TR008)											\$42.44		\$0			
137	A.3.14	Unbundled Loop Concentration - System A (TR303)											\$194.24		\$0			
138	A.3.15	Unbundled Loop Concentration - System B (TR303)											\$71.51		\$0			
139	A.3.16	Unbundled Loop Concentration - DS1 Line Interface Card											\$4.00		\$19.72	\$15.34		
140	A.3.16	Unbundled Loop Concentration - DS1 Line Interface Card - Disconnect Only													\$4.35	\$4.35		
141	A.3.17	Unbundled Loop Concentration - POTS Card											\$1.59		\$17.46	\$13.69		
142	A.3.17	Unbundled Loop Concentration - POTS Card - Disconnect Only													\$4.35	\$4.35		
143	A.3.18	Unbundled Loop Concentration - ISDN (Brite Card)											\$6.35		\$17.46	\$13.69		
144	A.3.18	Unbundled Loop Concentration - ISDN (Brite Card) - Disconnect Only													\$4.35	\$4.35		
145	A.3.19	Unbundled Loop Concentration - SPOTS Card											\$9.45		\$17.46	\$13.69		
146	A.3.19	Unbundled Loop Concentration - SPOTS Card - Disconnect Only													\$4.35	\$4.35		
147	A.3.20	Unbundled Loop Concentration - Specials Card											\$5.63		\$17.46	\$13.69		
148	A.3.20	Unbundled Loop Concentration - Specials Card - Disconnect Only													\$4.35	\$4.35		
149	A.3.21	Unbundled Loop Concentration - TEST CIRCUIT Card											\$27.54		\$17.46	\$13.69		
150	A.3.21	Unbundled Loop Concentration - TEST CIRCUIT Card - Disconnect Only													\$4.35	\$4.35		
151	A.3.22	Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data											\$8.35		\$17.46	\$13.69		
152	A.3.22	Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data - Disconnect Only													\$4.35	\$4.35		
153																		
154	A.4	4-WIRE ANALOG VOICE GRADE LOOP																
155	A.4.1	4-Wire Analog Voice Grade Loop											\$15.65		\$17.59	\$9.89		
156		Zone 1											\$10.45					
157		Zone 2											\$14.63					
158		Zone 3											\$18.04					
159		Zone 4											\$27.69					
160		Zone 5											\$40.66					
161		Zone 6											\$64.34					
162	A.4.1	4-Wire Analog Voice Grade Loop - Disconnect Only													\$4.10	\$2.73		
163																		
164	A.5	2-WIRE ISDN DIGITAL GRADE LOOP																
165	A.5.1	2-Wire ISDN Digital Grade Loop											\$9.95		\$22.58	\$13.79		
166		Zone 1											\$6.65					
167		Zone 2											\$9.30					
168		Zone 3											\$11.47					
169		Zone 4											\$17.60					
170		Zone 5											\$25.85					
171		Zone 6											\$40.91					
172	A.5.1	2-Wire ISDN Digital Grade Loop - Disconnect Only													\$7.78	\$5.18		
173																		
174	A.6	2-WIRE ASYMMETRICAL DIGITAL SUBSCRIBER LINE (ADSL) COMPATIBLE LOOP																
175	A.6.1	2-Wire Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop											\$7.46		\$20.64	\$12.00		
176		Zone 1											\$4.98					
177		Zone 2											\$6.97					
178		Zone 3											\$8.60					
179		Zone 4											\$13.20					
180		Zone 5											\$19.38					
181		Zone 6											\$30.67					
182	A.6.1	2-Wire Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop - Disconnect Only													\$5.70	\$3.11		
183																		
184	A.7	2-WIRE HIGH BIT RATE DIGITAL SUBSCRIBER LINE (HDSL) COMPATIBLE LOOP																
185	A.7.1	2-Wire High Bit Rate Digital Subscriber Line (HDSL) Compatible Loop											\$6.17		\$20.64	\$12.00		
186		Zone 1											\$4.12					
187		Zone 2											\$5.77					
188		Zone 3											\$7.11					
189		Zone 4											\$10.92					
190		Zone 5											\$16.03					
191		Zone 6											\$25.37					
192	A.7.1	2-Wire High Bit Rate Digital Subscriber Line (HDSL) Compatible Loop - Disconnect Only													\$5.70	\$3.11		
193																		
194	A.8	4-WIRE HIGH BIT RATE DIGITAL SUBSCRIBER LINE (HDSL) COMPATIBLE LOOP																



005557

A		B		C	D	E	F	G	H	I	J	K	L	M	N	O	
1																	
2																	
3	Study Name:	Florida Docket No 990649-TP															
4	State:	Florida															
5																	
6																	
7	<b>Cost Element</b>	<b>Description</b>										<b>AT&amp;T &amp; MCI WorldCom Proposed</b>					
8												<b>Recurring</b>	<b>Non recurring</b>	<b>Non-Recurring</b>			
														<b>First</b>	<b>Additional</b>	<b>Initial</b>	<b>Subsequent</b>
257	A.13.1	2-Wire Copper Loop - short										\$7.46		\$26.43	\$16.27		
258		Zone 1										\$4.98					
259		Zone 2										\$6.97					
260		Zone 3										\$8.60					
261		Zone 4										\$13.20					
262		Zone 5										\$19.38					
263		Zone 6										\$30.67					
264	A.13.1	2-Wire Copper Loop - short - Disconnect Only												\$9.58	\$5.23		
265	A.13.7	2-Wire Copper Loop - long										\$7.46		\$26.43	\$16.27		
266		Zone 1										\$4.98					
267		Zone 2										\$6.97					
268		Zone 3										\$8.60					
269		Zone 4										\$13.20					
270		Zone 5										\$19.38					
271		Zone 6										\$30.67					
272	A.13.7	2-Wire Copper Loop - long - Disconnect Only												\$36.62	\$18.75		
273																	
274	A.14	4-WIRE COPPER LOOP															
275	A.14.1	4-Wire Copper Loop - short										\$12.88		\$29.45	\$19.28		
276		Zone 1										\$8.60					
277		Zone 2										\$12.04					
278		Zone 3										\$14.85					
279		Zone 4										\$22.79					
280		Zone 5										\$33.46					
281		Zone 6										\$52.96					
282	A.14.1	4-Wire Copper Loop - short - Disconnect Only												\$13.33	\$8.89		
283	A.14.7	4-Wire Copper Loop - long										\$12.88		\$29.45	\$19.28		
284		Zone 1										\$8.60					
285		Zone 2										\$12.04					
286		Zone 3										\$14.85					
287		Zone 4										\$22.79					
288		Zone 5										\$33.46					
289		Zone 6										\$52.96					
290	A.14.7	4-Wire Copper Loop - long - Disconnect Only												\$13.33	\$8.89		
291																	
292	A.15	UNBUNDLED NETWORK TERMINATING WIRE (NTW)															
293	A.15.1	Unbundled Network Terminating Wire (NTW) per Pair										\$0.1762		\$0.4316			
294																	
295	A.16	HIGH CAPACITY UNBUNDLED LOCAL LOOP															
296	A.16.1	High Capacity Unbundled Local Loop - DS3 - Facility Termination										\$244.72		\$49.36	\$37.90		
297	A.16.1	High Capacity Unbundled Local Loop - DS3 - Facility Termination - Disconnect Only												\$18.18	\$9.70		
298	A.16.2	High Capacity Unbundled Local Loop - DS3 - Per Mile										\$4.19					
299	A.16.4	High Capacity Unbundled Local Loop - OC3 - Facility Termination										\$422.09		\$33.90	\$29.76		
300	A.16.4	High Capacity Unbundled Local Loop - OC3 - Facility Termination - Disconnect Only												\$5.00	\$5.00		
301	A.16.5	High Capacity Unbundled Local Loop - OC3 - Per Mile										\$3.18					
302	A.16.7	High Capacity Unbundled Local Loop - OC12 - Facility Termination										\$1,323		\$33.90	\$29.76		
303	A.16.7	High Capacity Unbundled Local Loop - OC12 - Facility Termination - Disconnect Only												\$5.00	\$5.00		
304	A.16.8	High Capacity Unbundled Local Loop - OC12 - Per Mile										\$3.91					
305	A.16.10	High Capacity Unbundled Local Loop - OC48 - Facility Termination										\$992.75		\$1,196	\$413.06		
306	A.16.10	High Capacity Unbundled Local Loop - OC48 - Facility Termination - Disconnect Only												\$112.71	\$109.45		
307	A.16.11	High Capacity Unbundled Local Loop - OC48 - Per Mile										\$12.84					
308	A.16.13	High Capacity Unbundled Local Loop - OC48 - Interface OC12 on OC48										\$416.95		\$549.32	\$315.26		
309	A.16.13	High Capacity Unbundled Local Loop - OC48 - Interface OC12 on OC48 - Disconnect Only												\$112.71	\$109.45		
310	A.16.15	High Capacity Unbundled Local Loop - STS-1 - Facility Termination										\$277.98		\$49.36	\$37.90		
311	A.16.15	High Capacity Unbundled Local Loop - STS-1 - Facility Termination - Disconnect Only												\$18.18	\$9.70		
312	A.16.16	High Capacity Unbundled Local Loop - STS-1 - Per Mile										\$4.19					
313																	
314	A.17	LOOP CONDITIONING															
315	A.17.1	Unbundled Loop Modification - Load Coil / Equipment Removal - short											\$0				
316	A.17.2	Unbundled Loop Modification - Load Coil / Equipment Removal - long - First and Additional												\$0	\$0		
317	A.17.3	Unbundled Loop Modification - Bridged Tap Removal											\$0				
318	A.17.4	Unbundled Loop Modification - Additive												\$121.27	\$121.27		

005558

		A	B	C	D	E	F	G	H	I	J	K	L	M	N	O		
1																		
2																		
3	Study Name:	Florida Docket No 990649-TP																
4	State:	Florida																
5																		
6																		
7	Cost Element	Description										AT&T & MCI WorldCom Proposed						
8												Recurring	Non recurring	First	Additional	Initial	Subsequent	
319																		
320	A.18	MULTIPLEXERS																
321	A.18.1	Channelization - Channel System DS1 to DS0										\$40.68		\$19.79	\$17.33			
322	A.18.1	Channelization - Channel System DS1 to DS0 - Disconnect Only												\$4.36	\$4.36			
323	A.18.2	Interface Unit - Interface DS1 to DS0 - OCU-DP Card										\$1.08		\$11.50	\$7.73			
324	A.18.3	Interface Unit - Interface DS1 to DS0 - BRITE Card										\$2.32		\$11.50	\$7.73			
325	A.18.4	Interface Unit - Interface DS1 to DS0 - Voice Grade Card										\$0.5084		\$11.50	\$7.73			
326	A.18.5	Channelization - Channel System DS3 to DS1										\$88.32		\$19.30	\$15.34			
327	A.18.5	Channelization - Channel System DS3 to DS1 - Disconnect Only												\$4.36	\$4.36			
328	A.18.6	Interface Unit - Interface DS3 to DS1										\$6.11		\$11.50	\$7.73			
329																		
330	A.19	LOOP TESTING BEYOND VOICE GRADE																
331	A.19.1	Loop Testing Beyond VG - Basic per 1/2 hour															\$0	\$0
332	A.19.2	Loop Testing Beyond VG - Overtime per 1/2 hour															\$0	\$0
333	A.19.3	Loop Testing Beyond VG - Premium per 1/2 hour															\$0	\$0
334																		
335	B.0	UNBUNDLED LOCAL EXCHANGE PORTS AND FEATURES																
336																		
337	B.1	EXCHANGE PORTS																
338	B.1.1	Exchange Ports - 2-Wire Analog Line Port (Res., Bus., Centrex, Coin)										\$0.6527		\$4.80	\$4.59			
339	B.1.1	Exchange Ports - 2-Wire Analog Line Port (Res., Bus., Centrex, Coin) - Disconnect Only												\$2.79	\$2.61			
340	B.1.2	Exchange Ports - 4-Wire Analog Voice Grade Port										\$6.05		\$4.80	\$4.59			
341	B.1.2	Exchange Ports - 4-Wire Analog Voice Grade Port - Disconnect Only												\$2.85	\$2.67			
342	B.1.3	Exchange Ports - 2-Wire DID Port										\$3.58		\$250.44	\$37.88			
343	B.1.3	Exchange Ports - 2-Wire DID Port - Disconnect Only												\$114.45	\$9.06			
344	B.1.4	Exchange Ports - DDITS Port										\$24.48		\$417.63	\$193.41			
345	B.1.4	Exchange Ports - DDITS Port - Disconnect Only												\$138.70	\$138.70			
346	B.1.5	Exchange Ports - 2-Wire ISDN Port										\$3.64		\$156.38	\$107.10			
347	B.1.5	Exchange Ports - 2-Wire ISDN Port - Disconnect Only												\$100.02	\$22.47			
348	B.1.6	Exchange Ports - 4-Wire ISDN DS1 Port										\$37.17		\$421.25	\$205.27			
349	B.1.6	Exchange Ports - 4-Wire ISDN DS1 Port - Disconnect Only												\$151.29	\$38.32			
350	B.1.7	Exchange Ports - 2-Wire Analog Line Port (PBX)										\$0.6527		\$63.20	\$30.01			
351	B.1.7	Exchange Ports - 2-Wire Analog Line Port (PBX) - Disconnect Only												\$26.64	\$1.71			
352																		
353	B.4	FEATURES																
354	B.4.10	Centrex Functionality										\$0.00						
355	B.4.13	Features per port										\$0.9147						
356																		
357	C.0	UNBUNDLED SWITCHING AND LOCAL INTERCONNECTION																
358																		
359	C.1	END OFFICE SWITCHING																
360	C.1.1	End Office Switching Function, Per MOU										\$0.0004085						
361	C.1.2	End Office Trunk Port - Shared, Per MOU										\$0.0000737						
362																		
363	C.2	TANDEM SWITCHING																
364	C.2.1	Tandem Switching Function Per MOU										\$0.0001110						
365	C.2.2	Tandem Trunk Port - Shared, Per MOU										\$0.0001065						
366																		
367	D.0	UNBUNDLED TRANSPORT AND LOCAL INTEROFFICE TRANSPORT																
368																		
369	D.1	COMMON TRANSPORT																
370	D.1.1	Common Transport - Per Mile, Per MOU										\$0.0000028						
371	D.1.2	Common Transport - Facilities Termination Per MOU										\$0.0002850						
372																		
373	D.2	INTEROFFICE TRANSPORT - DEDICATED - VOICE GRADE																
374	D.2.1	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Per Mile										\$0.0035						
375	D.2.2	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination										\$14.38		\$15.13	\$10.55			
376	D.2.2	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination - Disconnect Only												\$9.58	\$5.23			
377																		
378	D.3	INTEROFFICE TRANSPORT - DEDICATED - DS0 - 56/64 KBPS																
379	D.3.1	Interoffice Transport - Dedicated - DS0 - Per Mile										\$0.0035						
380	D.3.2	Interoffice Transport - Dedicated - DS0 - Facility Termination										\$8.91		\$18.15	\$13.56			

005559

		A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
1																	
2																	
3	Study Name:	Florida Docket No 990649-TP															
4	State:	Florida															
5																	
6																	
7	Cost Element	Description										AT&T & MCI WorldCom Proposed					
8											Recurring	Non recurring	Non-Recurring				
													First	Additional	Initial	Subsequent	
381	D.3.2	Interoffice Transport - Dedicated - DS0 - Facility Termination - Disconnect Only												\$13.07	\$8.71		
382																	
383	D.4	INTEROFFICE TRANSPORT - DEDICATED - DS1															
384	D.4.1	Interoffice Transport - Dedicated - DS1 - Per Mile										\$0.0712					
385	D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination										\$57.63		\$19.24	\$15.34		
386	D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination - Disconnect Only												\$13.07	\$8.71		
387																	
388	D.5	LOCAL CHANNEL - DEDICATED															
389	D.5.1	Local Channel - Dedicated - 2-Wire Voice Grade										\$24.37		\$28.04	\$14.62		
390	D.5.1	Local Channel - Dedicated - 2-Wire Voice Grade - Disconnect Only												\$10.50	\$5.99		
391	D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade										\$25.26		\$31.06	\$17.63		
392	D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade - Disconnect Only												\$11.37	\$6.86		
393	D.5.7	Local Channel - Dedicated - DS3 - Per Mile										\$3.26					
394	D.5.8	Local Channel - Dedicated - DS3 - Facility Termination										\$328.38		\$46.10	\$37.90		
395	D.5.8	Local Channel - Dedicated - DS3 - Facility Termination - Disconnect Only												\$14.41	\$9.70		
396	D.5.10	Local Channel - Dedicated - OC3 - Per Mile										\$2.74					
397	D.5.11	Local Channel - Dedicated - OC3 - Facility Termination										\$583.29		\$33.89	\$29.75		
398	D.5.11	Local Channel - Dedicated - OC3 - Facility Termination - Disconnect Only												\$5.00	\$5.00		
399	D.5.13	Local Channel - Dedicated - OC12 - Per Mile										\$3.91					
400	D.5.14	Local Channel - Dedicated - OC12 - Facility Termination										\$1,616		\$33.89	\$29.75		
401	D.5.14	Local Channel - Dedicated - OC12 - Facility Termination - Disconnect Only												\$5.00	\$5.00		
402	D.5.16	Local Channel - Dedicated - OC48 - Per Mile										\$12.84					
403	D.5.17	Local Channel - Dedicated - OC48 - Facility Termination										\$1,041		\$33.89	\$29.75		
404	D.5.17	Local Channel - Dedicated - OC48 - Facility Termination - Disconnect Only												\$5.00	\$5.00		
405	D.5.19	Local Channel - Dedicated - OC48 - Interface OC12 on OC48										\$438.81		0	0		
406	D.5.19	Local Channel - Dedicated - OC48 - Interface OC12 on OC48 - Disconnect Only												0	0		
407	D.5.21	Local Channel - Dedicated - STS-1 - Facility Termination										\$343.01		\$46.10	\$37.89		
408	D.5.21	Local Channel - Dedicated - STS-1 - Facility Termination - Disconnect Only												\$14.41	\$9.70		
409	D.5.23	Local Channel - Dedicated - STS-1 -Per Mile										\$3.26					
410	D.5.24	Local Channel - Dedicated - DS1										\$32.79		\$41.58	\$21.75		
411	D.5.24	Local Channel - Dedicated - DS1 - Disconnect Only												\$13.42	\$13.42		
412																	
413	D.6	INTEROFFICE TRANSPORT - DEDICATED - DS3															
414	D.6.1	Interoffice Transport - Dedicated - DS3 - Per Mile										\$1.49					
415	D.6.2	Interoffice Transport - Dedicated - DS3 - Facility Termination										\$631.57		\$18.50	\$13.96		
416	D.6.2	Interoffice Transport - Dedicated - DS3 - Facility Termination - Disconnect Only												\$13.71	\$9.36		
417																	
418	D.7	INTEROFFICE TRANSPORT - DEDICATED - OC3															
419	D.7.1	Interoffice Transport - Dedicated - OC3 - Per Mile										\$2.93					
420	D.7.2	Interoffice Transport - Dedicated - OC3 - Facility Termination										\$1,800		\$18.50	\$13.96		
421	D.7.2	Interoffice Transport - Dedicated - OC3 - Facility Termination - Disconnect Only												\$13.71	\$9.36		
422																	
423	D.8	INTEROFFICE TRANSPORT - DEDICATED - OC12															
424	D.8.1	Interoffice Transport - Dedicated - OC12 - Per Mile										\$9.42					
425	D.8.2	Interoffice Transport - Dedicated - OC12 - Facility Termination										\$6,859		\$18.50	\$13.96		
426	D.8.2	Interoffice Transport - Dedicated - OC12 - Facility Termination - Disconnect Only												\$13.71	\$9.36		
427																	
428	D.9	INTEROFFICE TRANSPORT - DEDICATED - OC48															
429	D.9.1	Interoffice Transport - Dedicated - OC48 - Per Mile										\$12.13					
430	D.9.2	Interoffice Transport - Dedicated - OC48 - Facility Termination										\$7,583		\$25.59	\$7.90		
431	D.9.2	Interoffice Transport - Dedicated - OC48 - Facility Termination - Disconnect Only												\$18.05	\$4.98		
432	D.9.4	Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48										\$887.12		\$0	\$0		
433	D.9.4	Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48 - Disconnect Only												\$0	\$0		
434																	
435	D.10	INTEROFFICE TRANSPORT - DEDICATED - STS-1															
436	D.10.1	Interoffice Transport - Dedicated - STS-1 - Per Mile										\$1.49					
437	D.10.2	Interoffice Transport - Dedicated - STS-1 - Facility Termination										\$804.83		\$18.50	\$13.96		
438	D.10.2	Interoffice Transport - Dedicated - STS-1 - Facility Termination - Disconnect Only												\$13.71	\$9.36		
439																	
440	D.12	INTEROFFICE TRANSPORT - DEDICATED - 4-WIRE VOICE GRADE															
441	D.12.1	Interoffice Transport - Dedicated - 4-Wire Voice Grade - Per Mile										\$0.0035					
442	D.12.2	Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination										\$12.20		\$18.15	\$13.56		









005563

A		B		C	D	E	F	G	H	I	J	K	L	M	N	O
7	Cost Element	Description							AT&T & MCI WorldCom Proposed							
			Recurring	Non recurring	First	Additional	Initial	Subsequent								
1																
2																
3	Study Name:	Florida Docket No 990649-TP														
4	State:	Florida														
5																
6																
629	N.1.1	Electronic Service Order, per local service request										\$0				
630	N.1.1	Electronic Service Order, per local service request - Disconnect Only										\$0				
631	N.1.2	Manual Service Order, per local service request										\$0				
632	N.1.2	Manual Service Order, per local service request - Disconnect Only										\$0				
633	N.1.5	Order Coordination										\$1.65				
634	N.1.6	Order Coordination for Specified Conversion Time										\$1.37				
635																
636	P.0	UNBUNDLED LOOP COMBINATIONS														
637																
638	P.1	2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (RES, BUS, COIN, CENTREX, PBX)														
639	P.1.1	2-Wire Voice Grade Loop										\$7.34				
640		Zone 1										\$4.90				
641		Zone 2										\$6.86				
642		Zone 3										\$8.46				
643		Zone 4										\$12.99				
644		Zone 5										\$19.07				
645		Zone 6										\$30.18				
646	P.1.2	Exchange Port - 2-Wire Line Port										\$0.6036				
647	P.1.3	2-Wire Voice Grade Loop / Line Port Combination - Nonrecurring Costs - Switch-as-is											\$0.2004	\$0.2004		
648	P.1.11	Centrex Common Block - Nonrecurring Costs - Switch-as-is											\$86.44	\$33.85		
649	P.1.13	2-Wire Voice Grade Loop/ Line Port Combination (PBX) Nonrecurring costs - switch-as-is											\$16.14	\$3.88		
650	P.1.17	PBX Subsequent Activity - Change/Rearrange Multiline Hunt Group											\$14.94			
651																
652	P.3	2-WIRE VOICE GRADE LOOP WITH 2-WIRE DID TRUNK PORT														
653	P.3.3	2-Wire Voice Grade Loop / 2-Wire DID Trunk Port Combination - Nonrecurring Costs - Switch-as-is											\$14.91	\$3.81		
654	P.3.7	2-Wire DID Subsequent Activity - Add Trunks, Per Trunk											\$54.66			
655																
656	P.4	2-WIRE ISDN DIGITAL GRADE LOOP WITH 2-WIRE ISDN DIGITAL LINE SIDE PORT														
657	P.4.1	2-Wire ISDN Digital Grade Loop											\$8.62			
658		Zone 1											\$5.76			
659		Zone 2											\$8.06			
660		Zone 3											\$9.94			
661		Zone 4											\$15.25			
662		Zone 5											\$22.39			
663		Zone 6											\$35.44			
664	P.4.2	Exchange Port - 2-Wire ISDN Line Side Port											\$3.37			
665	P.4.3	2-Wire ISDN Digital Grade Loop / 2-Wire ISDN Line Side Port Combination - Nonrecurring Costs - Switch-as-is												\$87.99	\$55.14	
666																
667	P.5	4-WIRE DS1 DIGITAL LOOP WITH 4-WIRE ISDN DS1 DIGITAL TRUNK PORT														
668	P.5.3	4-Wire DS1 Digital Loop / 4-Wire ISDN DS1 Digital Trunk Port Combination - Nonrecurring Costs - Switch-as-is												\$252.45	\$173.47	
669	P.5.5	4-Wire DS1 Digital Loop / 4-Wire ISDN DS1 Digital Trunk Port Combination - Subsequent Channel Activation - Per Channel												\$29.65		
670	P.5.6	4-Wire DS1 Digital Loop / 4-Wire ISDN DS1 Digital Trunk Port Combination - Subsequent Inward/2-Way Telephone Numbers												\$1.00		
671	P.5.7	4-Wire DS1 Digital Loop / 4-Wire ISDN DS1 Digital Trunk Port Combination - Subsequent Outward Telephone Numbers												\$23.49		
672	P.5.8	4-Wire DS1 Digital Loop / 4-Wire ISDN DS1 Digital Trunk Port Combination - Subsequent Inward Telephone Numbers												\$46.99		
673																
674	P.15	4-WIRE DS1 DIGITAL LOOP WITH DDITS PORT														
675	P.15.3	4-wire DS1 Digital Loop / DDITS Trunk Port Combination - Nonrecurring Costs - Switch-as-is												\$273.73	\$136.80	
676	P.15.5	4-Wire DS1 Digital Loop / DDITS Trunk Port Combination - Subsequent Channel Activation - Per Channel												\$29.55		
677																
678	P.16	2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE PORT														
679	P.16.3	2W VG Loop / 2W VG IO Transport / 2W Port Combination - Nonrecurring Costs - Switch-as-is												\$17.32	\$3.81	
680																
681	P.17	Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination														
682	P.17.1	Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch -As-Is												\$10.55	\$6.78	
683	P.17.1	Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch -As-Is - Disconnect Only												\$9.58	\$5.23	
684	P.17.4	Nonrecurring Cost - New DS1 Interoffice Facility for Combination Use Only												\$19.24	\$15.34	
685	P.17.4	Nonrecurring Cost - New DS1 Interoffice Facility for Combination Use Only - Disconnect Only												\$13.07	\$8.71	
686	P.17.5	Nonrecurring Cost - New DS1 Interoffice Facility w/ 1/0 MUXing for Combination Use Only												\$23.13	\$19.30	
687	P.17.5	Nonrecurring Cost - New DS1 Interoffice Facility w/ 1/0 MUXing for Combination Use Only - Disconnect Only												\$17.42	\$13.07	
688	P.17.7	Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility for Combination Use Only												\$23.54	\$19.58	
689	P.17.7	Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility for Combination Use Only - Disconnect Only												\$13.07	\$8.71	
690	P.17.8	Nonrecurring Cost - New DS3 or STS-1 w/ 3/1 MUXing Interoffice Facility for Combination Use Only												\$27.85	\$24.08	

A		B				C	D	E	F	G	H	I	J	K	L	M	N	O	
1																			
2																			
3	Study Name:	Florida Docket No 990649-TP																	
4	State:	Florida																	
5																			
6																			
7	Cost Element	Description										AT&T & MCI WorldCom Proposed							
8												Recurring	Non recurring	Non-Recurring					
														First	Additional	Initial	Subsequent		
691	P.17.8	Nonrecurring Cost - New DS3 or STS-1 w/ 3/1 MUXing Interoffice Facility for Combination Use Only - Disconnect Only												\$17.42	\$13.07				
692	P.17.10	Nonrecurring Cost - New VG Local Loop for Combination Use Only												\$8.17	\$4.07				
693	P.17.10	Nonrecurring Cost - New VG Local Loop for Combination Use Only - Disconnect Only												\$4.70	\$0.9409				
694	P.17.11	Nonrecurring Cost - New DS1 Local Loop for Combination Use Only												\$8.69	\$4.07				
695	P.17.11	Nonrecurring Cost - New DS1 Local Loop for Combination Use Only - Disconnect Only												\$4.70	\$0.9409				
696	P.17.12	Nonrecurring Cost - New DS3 or STS-1 Local Loop for Combination Use Only												\$8.14	\$4.07				
697	P.17.12	Nonrecurring Cost - New DS3 or STS-1 Local Loop for Combination Use Only - Disconnect Only												\$4.70	\$0.9409				
698	P.17.16	Nonrecurring Cost - New Feature Activation for Combination Use Only												\$1.99	\$1.99				
699	P.17.17	Nonrecurring Cost - New DS0 IOF for Combination Use Only												\$14.53	\$10.71				
700	P.17.17	Nonrecurring Cost - New DS0 IOF for Combination Use Only - Disconnect Only												\$9.58	\$5.23				
701																			
702	P.50	4-WIRE DS1 LOOP WITH CHANNELIZATION WITH PORT																	
703	P.50.1	4-Wire DS1 Loop/Channelization Port Combination - Nonrecurring Costs - Switch-as-is												\$316.56	\$17.06				
704	P.50.4	4-Wire DS1 Loop/Channelization Port Combination - Subsequent Activity - Add Lines - Per Line												\$111.34					
705	P.50.5	4-Wire DS1 Loop/Channelization Port Combination - Subsequent Activity - Add Trunks - Per Trunk												\$157.24					
706																			
707	Q.0	D4 CHANNEL BANKS																	
708																			
709	Q.1	D4 CHANNEL BANKS CENTRAL OFFICE																	
710	Q.1.1	D4 Channel Bank Inside CO - System												\$102.32					
711	Q.1.3	Unbundled Loop Concentration - ISDN (Brite Card)												\$2.53					
712	Q.1.4	Unbundled Loop Concentration - POTS Card												\$0.5549					
713																			
714																			
715	<b>AT&amp;T &amp; MCI WorldCom Revised Rate Proposal 08/01/00</b>																		
716	Populated Cost Element numbers A.2.14, A.2.15, A.3.12 - A.3.15, A.19.1 - A.19.3, and D.5.19																		
717	Aligned rate's description and rate proposal for Cost Element numbers B.1.1 - B.1.7																		
718	All Loop Recurring rates have been updated: A.1.1, A.1.2, A.2.1, A.2.2, A.2.11, A.2.23 - A.2.25, A.2.29, A.2.30, A.2.32, A.2.40, A.2.42, A.4.1, A.5.1, A.6.1, A.7.1, A.8.1, A.9.1, A.9.2, A.10.1, A.13.1, A.13.7, A.14.1, P.1.1, P.4.1																		
719	Original Exhibit JAK-1 filed on 7/31/00 did not reflect the import of BST's Loop Cost Model adjustments into the Cost Calculator.																		