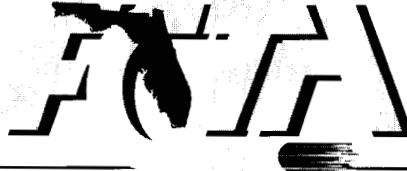


ORIGINAL



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Florida Cable Telecommunications Association

RECORDS AND REPORTING

Steve Wilkerson, President

VIA HAND DELIVERY

August 21, 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 the Prehearing Statement of the Florida Cable Telecommunications Association. Copies have been served on the parties of record pursuant to the attached certificate of service.

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,

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

MAG/mj

Enclosure

cc: All Parties of Record
William J. Barta

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10262 AUG 21 00

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled network elements.)
_____)

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

PREHEARING STATEMENT OF THE FLORIDA
CABLE TELECOMMUNICATIONS ASSOCIATION

Florida Cable Telecommunications Association (FCTA), pursuant to Order No. PSC-00-0540-PCO-TP, issued on March 16, 2000, Order No. PSC-00-2015-PCO-TP, issued on June 8, 2000, Order No. PSC-00-1485-PCO-TP, issued on August 18, 2000, and Order No. PSC-00-1486-PCO-TP, issued on August 18, 2000, of the Florida Public Service Commission, files its Prehearing Statement and states:

A. WITNESSES

The FCTA will present the following witness to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Proffered by</u>	<u>Issues #</u>
William J. Barta (Rebuttal only) ¹	FCTA	1, 2(a), 2(b), 7(a), 7(e), 7(g), 7(t), and 7(u)

¹FCTA has not yet determined whether it will be filing supplemental rebuttal testimony, but reserves the right to do so upon review of BellSouth's revised cost studies and revised direct testimony and exhibits.

DOCUMENT NUMBER-DATE
10262 AUG 21 8
FPCO-RECORDS/REPORTING

B. EXHIBITS

<u>Witness</u>	<u>Proffered by</u>	<u>I.D. No</u>	<u>Description</u>
William J. Barta	FCTA	<u>WJB-1</u>	BellSouth and GTE's Total Operating Expense - Depreciation Expense Per Access Lines, 1991-1999
		<u>WJB-2</u>	Analysis of Forward-looking Avoided Retail Costs vs. Commission-ordered Discount - BellSouth and GTE

C. BASIC POSITION

BellSouth has submitted recurring and nonrecurring cost studies in response to the Commission's list of issues outlined in its March 16, 2000 Order. The companies have also advanced their proposals for geographically deaveraging UNEs. BellSouth, in particular, argues that the geographic deaveraging of UNE rates should be accompanied by rate rebalancing and the establishment of a State universal service fund.

BellSouth's urgency to establish a state universal service fund in conjunction with the geographic deaveraging of UNEs strays from the purpose of the instant proceeding. There is no mention of rate rebalancing or the establishment of a universal service fund in the Commission's list of issues to address in this phase of the proceeding. Furthermore, BellSouth has yet to substantiate the pressure on universal service that they maintain will result in response to the implementation of deaveraged UNE rates. In this proceeding, the Commission's attention and resources should be focused on implementing fair and

reasonable permanent rates for unbundled network elements. The more appropriate forum to determine the need, if any, for a universal service support mechanism is in a separate docket.

BellSouth's "rate group to zone mapping" methodology blurs the distinction of cost differences among wire centers and between geographic zones. In order to send the correct pricing and investment signals to CLECs, the companies should geographically deaverage UNE rates based upon a methodology that logically groups wire centers with similar cost characteristics together.

D.-F. POSITIONS ON THE ISSUES

ISSUE 1

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

FCTA Position

The primary consideration of the Commission in its efforts to establish permanent rates for unbundled network elements and UNE combinations is to base the rates upon fully supported cost studies that closely follow the appropriate costing methodology. If appropriate cost-based rates are developed, then the attendant concerns of regulators, the incumbent local exchange carriers, and other parties should be satisfied. Appropriate cost-based rates will promote fair and responsible competitive entry under the requirements of the Telecommunications Act of 1996 and will protect the incumbent local exchange

carriers as the providers of the facilities necessary to provision the unbundled network elements and UNE combinations.

A forward-looking economic cost study is the most appropriate methodology to adopt when the study's objective is to replicate the conditions of a competitive market. If unbundled network elements are priced at the incumbent carrier's forward-looking economic costs, then competing telecommunications service providers should have the opportunity to capture the same types of economies of scale and scope that the incumbent local exchange carrier benefits from. As a result, the telecommunications carriers requesting unbundled network elements should be able to produce more efficiently and compete more effectively – all to the ultimate benefit of the consumer of telecommunications services. In addition, prices based upon a forward-looking costing methodology reduce the ability of the incumbent local exchange carrier to engage in anti-competitive pricing behavior.

However, BellSouth is opposed to the establishment of UNE rates based upon forward-looking, economic costs. BellSouth states that a forward-looking, economic cost methodology will not provide for the full recovery of the carriers' costs in the provision of UNEs.

It is improper to include the embedded costs of the ILEC in the development of UNE rates. By definition, embedded costs reflect historical purchase prices, network configurations, and operating procedures. To the extent that these cost areas reflect any past inefficiencies,

prices based upon embedded costs will lead to inappropriate cost recovery and would not be recovered in a competitive market. On the other hand, prices based upon forward-looking, economic costs give the appropriate signals to producers and consumers and ensure efficient entry and utilization of the telecommunications infrastructure.

Additionally, BellSouth states that optimizing competitive development would require prices to be set, at a minimum, to cover the embedded costs incurred by the Incumbent Local Exchange Carrier ('ILEC')". BellSouth apparently believes that a forward-looking, economic cost methodology prevents it from recovering its shared and common costs.

The incumbent carriers can recover a reasonable share of their forward-looking joint and common costs under the forward-looking, economic cost methodology. Most parties, including CLECs, acknowledge that the incumbent local exchange carriers are entitled to recover an appropriate portion of their forward-looking joint (i.e. shared) and common costs.

Finally, it is BellSouth's perception that a forward-looking, economic cost methodology does not provide BellSouth the opportunity to earn a reasonable profit as permitted by the 1996 Act. But BellSouth, as well as all other ILECs should not be allowed to include an economic profit in their proposed UNE rates. A more reasonable view with respect to profits that exceed a company's cost of capital holds that such profits are considered supra-normal and temporary. Absent artificial barriers to entry (e.g. monopoly status of the market provider) in the marketplace, the firm will only realize the supra-normal profits in

the short-term because other capable firms will be attracted to the prospect of earning supra-normal profits. As more firms enter and compete in the marketplace, prices will be driven back towards the level where only the fair and reasonable cost of capital is being recovered.

Reasonable, forward-looking rates for unbundled network elements should make it possible for CLECs to reach a wider range of consumers because the economies of scale and scope that were referred to earlier will be available on competitive terms. With reasonable, economic cost-based rates, CLECs will be in a better position to profitably serve the average consumer, not just the high revenue-high margin subscriber.

ISSUES 2(a),(b)(1-4)

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

FCTA Position

The FCC requires that incumbent local exchange carriers deaverage rates for those unbundled network elements that exhibit significant geographical cost differences. The FCC specifies that UNE rates deaveraged across three geographic zones is presumptively sufficient. The deaveraging of unbundled network elements and UNE combinations should be based upon a rational assignment where the underlying costs of providing the UNE are consistent within the geographic zone. For instance, the average cost of a loop can be determined on a wire center basis. Wire centers with similar cost characteristics should be grouped together in order to develop more accurate cost-based rates for each geographic

zone.

BellSouth advocates that the wire centers within its existing rate groups be classified into one of three zone designations. BellSouth's rate group to zone mapping approach results in geographic zones that include wire centers with wide-ranging average monthly loop costs. The extent of the low cost/high cost wire center combination within each proposed geographic zone is material and blurs the distinction of cost differences among wire centers and between geographic zones. There should be a more homogenous classification of wire centers to geographic zones based upon the cost characteristics of the individual wire centers.

The FCTA recommends that the methodology adopted as part of the stipulation reached among the parties in support of interim UNE rates in Florida be used for permanent pricing purposes. In the stipulation methodology, the deaveraging of the unbundled loop is based upon the ratio of an individual wire center's average monthly loop cost to the statewide average monthly loop cost. All wire centers with costs of 0% to 100% of the statewide average loop cost are assigned to Zone 1. All wire centers with average loop costs ranging from 101% to 200% of the statewide average are classified to Zone 2. Finally, all wire centers with average loop costs in excess of 200% of the statewide average cost are placed in Zone 3.

The rates for unbundled network elements and UNE combinations should be structured to recover the ILECs costs in the manner in which they are incurred. In general, recurring

costs should be recovered through monthly recurring rates while reasonable, nonrecurring charges should be assessed to recover nonrecurring costs.

By adhering to these general principles of rate design, the appropriate pricing signals will be sent to requesting carriers and assist in their decision to lease or construct their own network facilities. The development of competition should also be encouraged by allowing the competing carriers to incur costs in a manner similar to those incurred by the ILECs.

(b)(1-4) For which of the following UNEs should the Commission set deaveraged rates?

(1) Loops (all)

FCTA Position

The rates for an unbundled network element should be deaveraged where significant cost variations are present. For instance, the cost attributes of a loop reflect geographic differences. In highly concentrated urban areas, loop lengths tend to be shorter than in the more sparsely populated rural areas. Since loop length is considered to be a major cost driver in the provision of a loop, it is reasonable for the Commission to geographically deaverage the rates for an unbundled loop.

(2) Local switching

FCTA Position

One would not expect switching costs to differ materially between similarly configured switches whether they are deployed in an urban market or a rural wire center.

(3) Interoffice transport (dedicated and shared)

FCTA Position

Other UNEs, such as interoffice transport, already have rate structures (i.e. on a per mile basis) that account for geographic cost variations.

(4) Other (including combinations)

FCTA Position

The deaveraging of rates for UNE combinations should be based upon the cost characteristics of the underlying network components. Thus, the rate for a UNE combination that depends upon a loop (e.g. unbundled loop and transport) should reflect the deaveraged rate for an unbundled loop.

ISSUE 3(a)(b)

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

FCTA Position

FCTA has no position at this time.

ISSUE 4(a)(b)

- (a) Which subloop elements, if any, should be unbundled in this proceeding, and how should prices be set?
- (b) How should access to such subloop elements be provided, and how should prices be set?

FCTA Position

FCTA has no position at this time.

ISSUE 7(a),(e)-(v)

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)

FCTA Position

The FCTA recommendation on this issue is limited to the copper/fiber crossover point. Other parties to the proceeding, however, are likely to raise valid concerns challenging additional assumptions and input values that are fundamental to the network configuration design of the ILECs' cost proxy models. A more efficient and cost-effective network configuration may very well be realized from their recommendations. Presumably, the model enhancements resulting from these recommendations will produce lower overall UNE rates.

The copper/fiber crossover point is a user-adjustable input value in each of the ILECs' cost proxy models. The copper/fiber crossover point refers to the threshold where fiber facilities are used in lieu of copper facilities. Each of the ILECs' cost proxy models adopt a default input value of 12,000 feet for the copper/fiber crossover threshold.

The appropriate copper/fiber crossover point should be adjusted to 18,000 feet. A model platform that uses 18,000 foot copper loop lengths will support appropriate quality levels of services in most cases. The 12,000 foot constraint may ensure the provision of all services, including video services, but it burdens the majority of UNE rates with additional and unnecessary costs.

(e) structure sharing

Structure sharing refers to the practice of sharing investments in poles, trenches, and conduits with other utilities and/or carriers. It is difficult to separately identify the extent of structure sharing assumed in the BellSouth cost proxy model, since BellSouth contends that structure sharing is reflected implicitly in its calculations.

FCTA recommends that the structure sharing model values for BellSouth be modified to include at least two additional parties sharing pole facilities. The percentage of structure sharing among utilities and other users should increase in the future as more parties require space on a limited number of facilities and rights-of-way. The FCTA's recommended structure sharing level recognizes that although there will be more carriers seeking the economic benefits of structure sharing, the opportunities for such sharing may be constrained for a number of reasons, including engineering limitations.

(f) structure costs

FCTA has no position at this time.

(g) fill factors

The fill factors used in the ILECs' cost proxy models affect the level of investment required to provide services to customers. Lower than necessary utilization rates increase total loop investment because the increase in required capacity associated with lower fill factors increases the amount of loop plant used to deliver telecommunications services. Optimistically robust fill factors may jeopardize the quality of service.

The appropriate fill factor used in the cost proxy models should balance current and expected demand levels as well as accommodate the requirements for administrative and modular related spare capacity over the economic life of the feeder and distribution facilities. Deploying facilities to satisfy demand that is not expected to materialize until after the facilities have been retired represents poor management judgment. A competitive firm would not be able to overcome such errors of judgment by passing on the higher costs to its customers. The economic lives that the incumbent carriers have assigned to distribution and feeder facilities for capital recovery purposes should be consistent with the fill factors developed as part of the efficient network configured by the cost proxy models. For instance, if the incumbent carriers assign an economic life of 14 years for metallic distribution facilities, then it is not reasonable to size these facilities to satisfy demand levels that may not emerge for 25 to 30 years in the future, long after the facilities are projected to be retired.

(h) manholes

FCTA has no position at this time.

(i) fiber cable

FCTA has no position at this time.

(j) copper cable

FCTA has no position at this time.

(k) drops

FCTA has no position at this time.

(l) network interface device

FCTA has no position at this time.

(m) digital loop carrier costs

FCTA has no position at this time.

(n) terminal costs

FCTA has no position at this time.

(o) switching costs and associated variables

FCTA has no position at this time.

(p) traffic data

FCTA has no position at this time.

(q) signaling system costs

FCTA has no position at this time.

(r) transport system costs and associated variables

FCTA has no position at this time.

(s) loadings

FCTA has no position at this time.

(t) expenses

The operating expenses proposed to be recovered by the ILECs are estimated by massaging base period expense levels through a series of adjustments and factors. The base year expenses may then be adjusted through inflation factors and productivity offsets as well as “normalization” adjustments in an effort to make the baseline data representative of forward-looking conditions. Other adjustments may also be proposed such as an avoided retail expense adjustment, activity based cost adjustments, special study adjustments, and

shared and common cost adjustments. Annual charge factors are also developed under a costing pool methodology that assigns individual plant and expense account activity to one or more cost pools.

The FCTA's analysis finds that the operating expenses included in BellSouth's cost studies appear overstated and not representative of forward-looking conditions. For instance, the inflation factor of 3.2% to 3.5% assumed by BellSouth exceeds the productivity offset of 3.1% resulting in a growing level of expenses each year during the forecast period. One would expect lower levels of operating expenses to be projected on a forward-looking basis assuming the network configurations of the cost proxy models embrace reasonable measures to implement the most efficient, least cost technology and engineering and operating practices. The trend of BellSouth's operations indicate declining expense levels on a per access line basis over the last several years. Therefore, an ILEC's proposal to recover a level of operating expenses that exceeds its historical costs should undergo rigorous scrutiny.

(u) common costs

Common costs refer to those costs that are common to all products and services of the ILECs. These costs cannot be identified with the provision of any specific service or group of services.

The carriers propose to recover their projected common costs through a uniform mark-up applied to the unbundled network elements and UNE combinations. BellSouth proposes

a mark-up of 6.24%. As part of their effort to develop forward-looking expenses subject to recovery through UNE rates, the carriers have made an adjustment to exclude the retail costs that will be avoided in the wholesale environment. The avoided retail cost adjustment, however, appears to understate the level of costs that should be excluded from the cost studies. The avoided retail cost adjustment should reflect the wholesale percentage discount ordered by the Florida Public Service Commission for each carrier. In the case of BellSouth, the FPSC ordered a resale discount of 21.83% for residential customers and 16.30% for business customers.

(v) **other**

FCTA has no position at this time.

ISSUE 8(a-f)

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**

FCTA has no position at this time .

(b) **OSS design**

FCTA has no position at this time.

(c) labor rates

FCTA has no position at this time.

(d) required activities

FCTA has no position at this time.

(e) mix of manual versus electronic activities

FCTA has no position at this time.

(f) other

FCTA has no position at this time.

ISSUE 9(a)(1-19):

(1) 2-wire voice grade loop

FCTA has no position at this time.

(2) 4-wire analog loop

FCTA has no position at this time.

(3) 2-wire ISDN/IDSL loop

FCTA has no position at this time.

(4) 2-wire xDSL-capable loop

FCTA has no position at this time.

(5) 4-wire xDSL-capable loop

FCTA has no position at this time.

(6) 4-wire 56 kbps loop

FCTA has no position at this time.

(7) 4-wire 64 kbps loop

FCTA has no position at this time.

(8) DS-1 loop

FCTA has no position at this time.

(9) high capacity loops (DS3 and above)

FCTA has no position at this time.

(10) dark fiber loop

FCTA has no position at this time.

(11) subloop elements (to the extent required by the Commission in Issue 4)

FCTA has no position at this time.

(12) network interface devices

FCTA has no position at this time.

(13) circuit switching (where required)

FCTA has no position at this time.

(14) packet switching (where required)

FCTA has no position at this time.

(15) shared interoffice transmission

FCTA has no position at this time.

(16) dedicated interoffice transmission

FCTA has no position at this time.

(17) dark fiber interoffice facilities

FCTA has no position at this time.

(18) signaling networks and call-related databases

FCTA has no position at this time.

(19) OS/DA (where required)

FCTA has no position at this time.

ISSUE 10

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

FCTA Position:

FCTA has no position at this time.

ISSUE 11

When should the recurring and non-recurring rates and charges take effect?

FCTA Position

FCTA has no position at this time.

ISSUE 12(a)(b)(1-3)

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

- (a)** “UNE platform” consisting of: loop (all), local (including packet, where required) switching (with signaling), and dedicated and shared transport (through and

including local termination);

FCTA Position

FCTA has no position at this time.

(b) “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.

FCTA Position

FCTA has no position at this time.

G. Stipulated Issues

The FCTA has not stipulated to any issues with any party to the proceeding.

H. Pending Motions

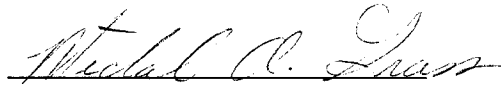
The FCTA has no pending motions or other matters its seeks action upon.

I. Requirements of Order No. PSC--00-0540-PCO-TP, Order No. PSC-00-2015-PCO-TP, Order No. PSC-00-1485-PCO-TP, and Order No. PSC-00-1486-PCO-TP.

There are no requirements of Order No. PSC-00-0540-PCO-TP, PSC-00-2015-PCO-TP, Order No. PSC-00-1485-PCO-TP, and Order No. PSC-00-1486-PCO-

TP, with which FCTA cannot comply.

Respectfully submitted this 21st day of August, 2000.



Michael A. Gross

Vice President, Regulatory Affairs
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Florida Cable Telecommunications Association

310 N. Monroe Street

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Attorney for FCTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Prehearing Statement of the Florida Cable Telecommunications Association, in Docket 990649-TP have been served upon the following parties by U.S. Mail this 21st day of August, 2000:

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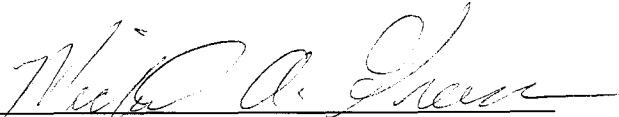
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