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May 13, 2002
Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 990649B-TP Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:
At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental documentation for previously submitted Requests for Confidential Classification as follows:

1. Responses to Staff's Seventh Request for Production of Documents (Nos. 73 and 78) (original request filed April 15, 2002) ; 0 会 14 NAY 138
2. Supplemental Responses to Staff's Eighth Set of Interrogatories (Nos. 242(b) and

3. Supplemental Response to AT\&T \& MCI's First Set of Interrogatories (No. 32) (original request filed April 23, 2002).


Highlighted copies of the, confidential information are provided on two diskettes and one CDROM. Also provided arefwo redacted diskettes and one redacted CD-ROM together with corresponding line-by-line justifications (Exhibit C).

If there are any questions regarding this filing, please contact me at 813-483-2617.

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$\qquad$ Sincerely,
Outran


Kimberly Caswell
KC:tas
Enclosures
c: Jason Fudge, Staff Counsel (w/e)
Diskettes $+C D-$ Rom founarded to staff-CCA note

## 99064 BB-TP Exhibit C <br> Staff's Seventh Request for Production of Documents <br> Nos. 73, 78 and 92




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File: FL Response Staff's 7th POD Q73-dbt
NOTE: 2 Workbooks, 1 for ALEC Coalition and 1 for Verizon
SOURCE OF DATA: Rebuttal Testimony of Warren R. Fischer, Exhibit WRF-3
Sprint Rate Banding Model - Recreated by QSI Consulting Populated with data for a 2-Wire Loop w/ NID for Verizon (COLLAPSED TO THREE ZONES)

| $\begin{aligned} & \text { Rate } \\ & \text { Band } \\ & \text { ID } \\ & \hline \end{aligned}$ | Rate Band | Total |  |  | Total <br> Monthly Cost | Percent of Total Lines |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Number of Wire Centers | Lines Served | Monthly Cost |  |  |
|  | 1 Rate Band 1 | 15 | 558,947 | \$15.56 | \$8,699,584 | 22.48\% |
|  | 2 Rate Band 2 | 41 | 1,477,142 | \$21.42 | \$31,643,725 | 59.40\% |
|  | 3 Rate Band 3 | 34 | 450,706 | \$37.06 | \$16,702,533 | 18.12\% |
|  | Totals | 90 | 2,486,795 | \$22.94 | \$57,045,841 | 100.00\% |

USER INPUTS

| Rate Band | Wire Center | Total <br> Lines <br> Served | Monthly Cost | Total <br> Monthly Cost | Percent of Total Lines in Rate Band | Percentage Deviation from Average |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 1 TAMPFLXX22H | 65,478 | \$8.93 | \$584,718.54 | 11.71\% | -42.62\% |
|  | 1 BHPKFLXA28H | 27,881 | \$13.27 | \$369,980.87 | 4.99\% | -14.74\% |
|  | 1 UNVRFLXA97H | 51,245 | \$15.64 | \$801,471.80 | 9.17\% | 0.49\% |
|  | 1 SPBGFLXA89H | 53,677 | \$15.71 | \$843,265.67 | 9.60\% | 0.94\% |
|  | 1 SEKYFLXA34H | 13,697 | \$16.06 | \$219,973.82 | 2.45\% | 3.19\% |
|  | 1 SRSTFLXA95H | 62,277 | \$16.12 | \$1,003,905.24 | 11.14\% | 3.57\% |
|  | 1 SARKFLXARSA | 3,300 | \$16.20 | \$53,460.00 | 0.59\% | 4.08\% |
|  | 1 GNDYFLXA57H | 25,379 | \$16.22 | \$411,647.38 | 4.54\% | 4.21\% |
|  | 1 WSSDFLXA87H | 49,667 | \$16.35 | \$812,055.45 | 8.89\% | 5.05\% |
|  | 1 SGBEFLXA36H | 19,313 | \$16.70 | \$322,527.10 | 3.46\% | 7.30\% |
|  | 1 INRKFLXX59H | 26,427 | \$16.77 | \$443,180.79 | 4.73\% | 7.75\% |
|  | 1 SWTHFLXA88H | 54,554 | \$17.26 | \$941,602.04 | 9.76\% | 10.90\% |
|  | 1 FHSDFLXA57H | 17,342 | \$17.40 | \$301,750.80 | 3.10\% | 11.79\% |
|  | 1 CLWRFLXA44H | 63,066 | \$17.82 | \$1,123,836.12 | 11.28\% | 14.49\% |
|  | 1 SPBGFLXS86H | 25,644 | \$18.18 | \$466,207.92 | 4.59\% | 16.81\% |
|  | 2 LRGOFLXA58H | 41,905 | \$18.34 | \$768,537.70 | 2.84\% | -14.39\% |
|  | 2 HYPKFLXADSO | 24,670 | \$18.41 | \$454,174.70 | 1.67\% | -14.06\% |
|  | 2 CNSDFLXA79H | 56,373 | \$18.74 | \$1,056,430.02 | 3.82\% | -12.52\% |
|  | 2 TMTRFLXADS0 | 35,833 | \$18.76 | \$672,227.08 | 2.43\% | -12.43\% |
|  | 2 PSDNFLXA34H | 36,452 | \$18.89 | \$688,578.28 | 2.47\% | -11.82\% |
|  | 2 ANMRFLXA77H | 9,121 | \$18.95 | \$172,842.95 | 0.62\% | -11.54\% |
|  | 2 BRBAFLXA75H | 56,959 | \$19.06 | \$1,085,638.54 | 3.86\% | -11.03\% |
|  | 2 PNLSFLXA53H | 51,435 | \$19.14 | \$984,465.90 | 3.48\% | -10.65\% |
|  | 2 SNSPFLXA37H | 20,111 | \$19.19 | \$385,930.09 | 1.36\% | -10.42\% |
|  | 2 DNDNFLXA73H | 27,600 | \$19.71 | \$543,996.00 | 1.87\% | -7.99\% |


| 2 LGBKFLXA38H | 12,996 | \$19.93 |
| :---: | :---: | :---: |
| 2 WLCRFLXA83H | 35,927 | \$20.11 |
| 2 BAYUFLXA54H | 37,895 | \$20.15 |
| 2 SLSPFLXA93H | 36,708 | \$20.43 |
| 2 NGBHFLXA39H | 53,845 | \$20.53 |
| 2 SMNLFLXA23H | 20,455 | \$20.64 |
| 2 LLMNFLXADS0 | 44,379 | \$20.76 |
| 2 YBCTFLXA24H | 15,914 | \$20.77 |
| 2 VENCFLXA48H | 33,436 | \$21.09 |
| 2 ENWDFLXA47H | 23,757 | \$21.19 |
| 2 OLDSFLXA85H | 21,447 | \$21.30 |
| 2 BRTNFLXX74H | 44,128 | \$21.42 |
| 2 SKWYFLXADS0 | 28,899 | \$21.73 |
| 2 STGRFLXA78H | 57,974 | \$21.77 |
| 2 CRWDFLXA96H | 61,713 | \$22.23 |
| 2 SSDSFLXA92H | 52,371 | \$22.37 |
| 2 LKLDFLXA68H | 49,282 | \$22.46 |
| 2 NPRCFLXA84H | 59,910 | \$22.66 |
| 2 PLSLFLXA79H | 26,769 | \$22.76 |
| 2 VENCFLXSDS0 | 24,694 | \$22.79 |
| 2 BRNDFLXA68H | 82,667 | \$22.97 |
| 2 NRSDFLXA35H | 30,294 | \$23.23 |
| 2 TAMPFLXEDS0 | 46,404 | \$23.32 |
| 2 TRSPFLXA93H | 45,652 | \$23.44 |
| 2 HGLDFLXA64H | 37,359 | \$23.89 |
| 2 SPRGFLXA37H | 36,174 | \$24.01 |
| 2 CYGRFLXA32H | 14,216 | \$24.12 |
| 2 WNHNFLXC29H | 36,682 | \$24.18 |
| 2 LUTZFLXA94H | 18,635 | \$24.91 |
| 2 OSPRFLXA96H | 11,026 | \$25.27 |
| 2 ABDLFLXA96H | 15,075 | \$25.69 |
| 3 LKLDFLXE66H | 23,086 | \$25.86 |
| 3 HDSNFLXA86H | 41,016 | \$27.06 |
| 3 BARTFLXA53H | 15,350 | \$27.57 |
| 3 ZPHYFLXA78H | 34,588 | \$28.48 |
| 3 PLMTFLXA72H | 26,139 | \$29.51 |
| 3 WLCHFLXA97H | 20,386 | \$29.83 |
| 3 ALFAFLXA67H | 20,535 | \$30.28 |
| 3 LKWLFLXA67H | 16,639 | \$31.22 |
| 3 RSKNFLXA64H | 13,117 | \$31.24 |
| 3 NRPTFLXA42H | 19,275 | \$31.64 |
| 3 LKLDFLXN85H | 30,084 | \$32.10 |
| 3 HNCYFLXA42H | 18,480 | \$32.55 |
| $3 \mathrm{KYSTFLXA92H}$ | 18,533 | \$33.17 |
| 3 MLBYFLXARSA | 7,148 | \$33.86 |
| 3 PTCYFLXA75H | 33,749 | \$33.99 |
| 3 BYSHFLXA84H | 1,610 | \$37.27 |
| 3 POINFLXARSA | 2,237 | \$37.82 |


| 3 THNTFLXADSO | 8,649 | $\$ 38.39$ | $\$ 332,035.11$ | $1.92 \%$ | $3.59 \%$ |
| :--- | ---: | ---: | ---: | ---: | ---: |
| 3 WIMMFLXA63H | 17,293 | $\$ 38.40$ | $\$ 664,051.20$ | $3.84 \%$ | $3.62 \%$ |
| 3 MNLKFLXA85H | 10,596 | $\$ 39.25$ | $\$ 415,893.00$ | $2.35 \%$ | $5.91 \%$ |
| 3 HNCYFLXN424 | 13,085 | $\$ 40.92$ | $\$ 535,438.20$ | $2.90 \%$ | $10.42 \%$ |
| 3 BBPKFLXARSA | 3,326 | $\$ 46.24$ | $\$ 153,794.24$ | $0.74 \%$ | $24.78 \%$ |
| 3 LKALFLXA95H | 5,101 | $\$ 47.23$ | $\$ 240,920.23$ | $1.13 \%$ | $27.45 \%$ |
| 3 DUNDFLXA43H | 7,393 | $\$ 52.23$ | $\$ 386,136.39$ | $1.64 \%$ | $40.94 \%$ |
| 3 LNLKFLXA99H | 9,377 | $\$ 56.69$ | $\$ 531,582.13$ | $2.08 \%$ | $52.97 \%$ |
| 3 ALTRFLXARSA | 2,589 | $\$ 56.84$ | $\$ 147,158.76$ | $0.57 \%$ | $53.38 \%$ |
| 3 PNCRFLXA73J | 5,174 | $\$ 60.30$ | $\$ 311,992.20$ | $1.15 \%$ | $62.72 \%$ |
| 3 PKCYFLXARSA | 5,762 | $\$ 63.17$ | $\$ 363,985.54$ | $1.28 \%$ | $70.46 \%$ |
| 3 FRSTFLXA63H | 6,008 | $\$ 66.07$ | $\$ 396,948.56$ | $1.33 \%$ | $78.29 \%$ |
| 3 LKWLFLXERSA | 3,932 | $\$ 68.30$ | $\$ 268,555.60$ | $0.87 \%$ | $84.30 \%$ |
| 3 BRJTFLXARSA | 1,266 | $\$ 106.72$ | $\$ 135,107.52$ | $0.28 \%$ | $187.98 \%$ |
| 3 PRSHFLXARSA | 4,208 | $\$ 131.22$ | $\$ 552,173.76$ | $0.93 \%$ | $254.09 \%$ |
| 3 INLKFLXARSA | 1,592 | $\$ 132.01$ | $\$ 210,159.92$ | $0.35 \%$ | $256.22 \%$ |
| 3 MYCYFLXA32H | 3,383 | $\$ 202.58$ | $\$ 685,328.14$ | $0.75 \%$ | $446.65 \%$ |
|  |  |  |  |  |  |


| ALEL | LINES IN WVIKE LENIEKS |  |
| :---: | :---: | :---: |
| COALITION'S | WITH COSTS BELOW |  |
| PROPOSED 3 | AVERAGE ZONE COST | Percent of Total |
| ZONES | (Bolded Lines) | Lines |
| Zone 1 | 93,359 |  |
| Zone 2 | 741,346 |  |
| Zone 3 | 338,125 | $\mathbf{4 7 . 2 \%}$ |
| TOTAL | $\mathbf{1 , 1 7 2 , 8 3 0}$ |  |

VZ's Total Lines $=\quad 2,486,795$

Source of Data: Direct Testimony of Dennis B. Trimble Exhibit DBT-3

> VERIZON FLORIDA INC.
> (formerly GTE Florida, Inc.) Unbundled Network Elements

Deaveraging Proposal Based on 2-Wire UNE Loops

| Deaveraged Zone | Avg 2-Wire Loop <br> Costs * | Number <br> of Wire <br> Centers | Number of <br> Lines | Percent <br> of Lines |
| :---: | ---: | ---: | ---: | ---: |
| Zone 1 | $\$ 18.94$ | 45 | $1,661,905$ | $66.8 \%$ |
| Zone 2 | $\$ 27.68$ | 32 | 765,779 | $30.8 \%$ |
| Zone 3 | $\$ 74.16$ | 13 | 59,111 | $2.4 \%$ |
| Statewide: | $\$ 22.94$ | 90 | $2,486,795$ | $100.0 \%$ |

* Average Loop Costs are from ICM-FL and include the NID

ZONE $1=$ VZ Statewide Average 2-Wire Loop Costs $=\$ 22.94$
ZONE $2=200 \%$ of VZ Statewide Average 2-Wire Loop Costs $=\$ 45.88$
ZONE 3 = Greater than $200 \%$ of VZ Statewide Average 2-Wire Loop Costs

| CLLI Code | Wire Center Name | $\begin{array}{\|l\|} \hline \text { Avg. Cost } \\ \text { per Loop } \\ \hline \end{array}$ | Number of Lines | Zone | Percent Deviation from Average |
| :---: | :---: | :---: | :---: | :---: | :---: |
| TAMPFLXX22H | TAMPA MAIN | \$8.93 | 65,478 | 1 | -52.8\% |
| BHPKFLXA28H | BEACH PARK | \$13.27 | 27,881 | 1 | -29.9\% |
| UNVRFLXA97H | UNIVERSITY | \$15.64 | 51,245 | 1 | -17.4\% |
| SPBGFLXA89H | ST. PETERSBURG MAIN | \$15.71 | 53,677 | 1 | -17.0\% |
| SEKYFLXA34H | SIESTA KEY | \$16.06 | 13,679 | 1 | -15.2\% |
| SRSTFLXA95H | SARASOTA MAIN | \$16.12 | 62,277 | 1 | -14.8\% |
| SARKFLXARSA | ST. ARMANDS KEY | \$16.20 | 3,300 | 1 | -14.5\% |
| GNDYFLXA57H | GANDY | \$16.22 | 25,397 | 1 | -14.3\% |
| WSSDFLXA87H | WESTSIDE | \$16.35 | 49,667 | 1 | -13.6\% |
| SGBEFLXA36H | SOUTH GULF BEACH | \$16.70 | 19,313 | 1 | -11.8\% |
| INRKFLXX59H | INDIAN ROCKS | \$16.77 | 26,427 | 1 | -11.4\% |
| SWTHFLXA88H | SWEETWATER | \$17.26 | 54,554 | 1 | -8.9\% |
| FHSDFLXA57H | FEATHER SOUND | \$17.40 | 17,342 | 1 | -8.1\% |
| CLWRFLXA44H | CLEARWATER | \$17.82 | 63,066 | 1 | -5.9\% |
| SPBGFLXS86H | ST. PETERSBURG SOUT | \$18.18 | 25,644 | 1 | -4.0\% |
| LRGOFLXA58H | LARGO | \$18.34 | 41,905 | 1 | -3.1\% |
| HYPKFLXADS0 | HYDE PARK | \$18.41 | 24,670 | 1 | -2.8\% |
| CNSDFLXA79H | COUNTRYSIDE | \$18.74 | 56,373 | 1 | -1.0\% |
| TMTRFLXADSO | TEMPLE TERRACE | \$18.76 | 35,833 | 1 | -0.9\% |
| PSDNFLXA34H | PASADENA | \$18.89 | 36,452 | 1 | -0.2\% |
| ANMRFLXA77H | ANNA MARIA | \$18.95 | 9,121 | 1 | 0.1\% |
| BRBAFLXA75H | BRADENTON BAY | \$19.06 | 56,959 | 1 | 0.6\% |
| PNLSFLXA53H | PINELLAS | \$19.14 | 51,435 | 1 | 1.1\% |
| SNSPFLXA37H | SEVEN SPRINGS | \$19.19 | 20,111 | 1 | 1.3\% |
| DNDNFLXA73H | DUNEDIN | \$19.71 | 27,600 | 1 | 4.1\% |


| LGBKFLXA38H | LONGBOAT | $\$ 19.93$ | 12,996 | 1 |
| :--- | :--- | ---: | ---: | ---: |
| WLCRFLXA83H | WALLCRAFT | $\$ 20.11$ | 35,927 | 1 |
| BAYUFLXA54H | BAYOU | $\$ 20.15$ | 37,895 | 1 |
| SLSPFLXXA93H | SULPHUR SPRINGS | $\$ 20.43$ | 36,708 | 1 |
| NGBHFLXA39H | NORTH GULF BEACH | $\$ 20.53$ | 53,845 | 1 |
| SMNLFLXA23H | SEMINOLE | $\$ 20.64$ | 20,455 | 1 |
| LLMNFLXADS0 | LEALMAN | $\$ 20.76$ | 44,379 | $6.2 \%$ |
| YBCTFLXA24H | YBOR CITY | $\$ 20.77$ | 15,914 | 1 |
| VENCFLXA48H | VENICE MAIN | $\$ 21.09$ | 33,436 | 1 |
| ENWDFLXA47H | ENGLEWOOD | $\$ 21.19$ | 23,757 | 1 |
| OLDSFLXA85H | OLDSMAR | $\$ 21.30$ | 21,447 | 1 |
| BRTNFLXX74H | BRADENTON MAIN | $\$ 21.42$ | 44,128 | 1 |
| SKWYFLXADS0 | SKYWAY | $\$ 21.73$ | 28,899 | 1 |
| STGRFLXA78H | ST. GEORGE | $\$ 21.77$ | 57,974 | 1 |
| CRWDFLXA96H | CARROLLWOOD | $\$ 22.23$ | 61,713 | 1 |
| SSDSFLXA92H | SOUTHSIDE | $\$ 22.37$ | 52,371 | 1 |
| LKLDFLXA68H | LAKELAND MAIN | $\$ 22.46$ | 49,282 | $11.4 \%$ |
| NPRCFLXA84H | NEW PORT RICHEY | $\$ 22.66$ | 59,910 | $11.9 \%$ |
| PLSLFLXA79H | PALMA SOLA | $\$ 22.76$ | 26,769 | $12.5 \%$ |
| VENCFLXSDS0 | VENICE SOUTH | $\$ 22.79$ | 24,694 | $13.1 \%$ |


|  |  | $1,661,905$ |  |  |
| :--- | :--- | ---: | ---: | ---: |
| BRNDFLXA68H | BRANDON | $\$ 22.97$ | $\mathbf{8 2 , 6 6 7}$ | 2 |
| NRSDFLXA35H | NORTHSIDE | $\$ 23.23$ | $\mathbf{3 0 , 2 9 4}$ | 2 |
| TAMPFLXEDS0 | TAMPA EAST | $\$ 23.32$ | $\mathbf{4 6 , 4 0 4}$ | 2 |
| TRSPFLXA93H | TARPON SPRINGS | $\$ 23.44$ | $\mathbf{4 5 , 6 5 2}$ | 2 |
| HGLDFLXA64H | HIGHLANDS | $\$ 23.89$ | $\mathbf{3 7 , 3 5 9}$ | 2 |
| SPRGFLXA37H | SARASOTA SPRINGS | $\$ 24.01$ | $\mathbf{3 6 , 1 7 4}$ | 2 |
| CYGRFLXA32H | CYPRESS GARDENS | $\$ 24.12$ | $\mathbf{1 4 , 2 1 6}$ | 2 |
| WNHNFLXC29H | WINTER HAVEN | $\$ 24.18$ | $\mathbf{3 6 , 6 8 2}$ | 2 |
| LUTZFLXA94H | LUTZ | $\$ 24.91$ | $\mathbf{1 8 , 6 3 5}$ | 2 |
| OSPRFLXA96H | OSPREY | $\$ 25.27$ | $\mathbf{1 1 , 0 2 6}$ | 2 |
| ABDLFLXA96H | AUBURNDALE | $\$ 25,69$ | $\mathbf{1 5 , 0 7 5}$ | 2 |
| LKLDFLXE66H | LAKELAND EAST | $\$ 25.86$ | $\mathbf{2 3 , 0 8 6}$ | 2 |
| HDSNFLXA86H | HUDSON | $\$ 27.06$ | $\mathbf{4 1 , 0 1 6}$ | 2 |
| BARTFLXA53H | BARTOW MAIN | $\$ 27.57$ | $\mathbf{1 5 , 3 5 0}$ | 2 |
| ZPHYFLXA78H | ZEPHYR HILLS | $\$ 28,48$ | 34,588 | 2 |
| PLMTFLXA72H | PALMETTO | $\$ 29.51$ | 26,139 | 2 |
| WLCHFLXA97H | WESLEY CHAPEL | $\$ 29.83$ | 20,386 | 2 |
| ALFAFLXA67H | ALAFIA | $\$ 30.28$ | 20,535 | 2 |
| LKWLFLXA67H | LAKE WALES MAIN | $\$ 31.22$ | 16,639 | 2 |
| RSKNFLXA64H | RUSKIN | $\$ 31.24$ | 13,117 | 2 |
| NRPTFLXA42H | NORTHPORT | $\$ 31.64$ | 19,275 | 2 |
| LKLDFLXN85H | LAKELAND NORTH | $\$ 32.10$ | 30,084 | 2 |
| HNCYFLXA42H | HAINES CITY MAIN | $\$ 32.55$ | 18,480 | 2 |
| KYSTFLXA92H | KEYSTONE | $\$ 33.17$ | 18,533 | 2 |
| MLBYFLXARSA | MULBERRY | $\$ 33.86$ | 7,148 | 2 |
| PTCYFLXA75H | PLANT CITY | $\$ 33.99$ | 33,749 | 2 |
| BYSHFLXA84H | BAYSHORE | $\$ 37.27$ | 1,610 | 2 |
| POINFLXARSA | POINCIANA | $\$ 37.82$ | 2,237 | 2 |
| THNTFLXADS0 | THONOTOSASSA | $\$ 38.39$ | 8,649 | 2 |
| WIMMFLXA63H | WIMAUMA | $\$ 38.40$ | 17,293 | 2 |
| MNLKFLXA85H | MOON LAKE | $\$ 39.25$ | 10,596 | 2 |


| HNCYFLXN424 | HAINES CITY NORTH | \$40.92 | 13,085 | 2 | 47.8\% |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | 765,779 |  | $=$ | \$27.68 |
| BBPKFLXARSA | BABSON PARK | \$46.24 | 3,326 | 3 | -37.7\% |  |
| LKALFLXA95H | LAKE ALFRED | \$47.23 | 5,101 | 3 | -36.3\% |  |
| DUNDFLXA43H | DUNDEE | \$52.23 | 7,393 | 3 | -29.6\% |  |
| LNLKFLXA99H | LAND O' LAKES | \$56.69 | 9,377 | 3 | -23.6\% |  |
| ALTRFLXARSA | ALTURAS | \$56.84 | 2,589 | 3 | -23.4\% |  |
| PNCRFLXA73] | PINECREST | \$60.30 | 5,174 | 3 | -18.7\% |  |
| PKCYFLXARSA | POLK CITY | $\$ 63.17$ | 5,762 | 3 | -14.8\% |  |
| FRSTFLXA63H | FROSTPROOF | \$66.07 | 6,008 | 3 | -10.9\% |  |
| LKWLFLXERSA | LAKE WALES EAST | \$68.30 | 3,932 | 3 | -7.9\% |  |
| BRJTFLXARSA | BRADLEY | \$106.72 | 1,266 | 3 | 43.9\% |  |
| PRSHFLXARSA | PARRISH | \$131.22 | 4,208 | 3 | 76.9\% |  |
| INLKFLXARSA | INDIAN LAKE | \$132.01 | 1,592 | 3 | 78.0\% |  |
| MYCYFLXA32H | MYAKKACTIY | \$202.58 | 3,383 | 3 | 173.2\% |  |
|  |  |  | 59,111 |  |  | \$74.16 |




## Comparison of Modeled Investment per Line

Q. ON A PER-LINE BASIS, DOES ICM-FL MODEL HIGHER SWITCH COSTS FOR THE GTD-5 THAN IT DOES FOR THE 5ESS AND NORTEL SWITCHES?
A. No. This is shown in the table below. Whether the modeled switch costs include or exclude power, test equipment, and the EF\&I and IAF adjustments, the modeled switch investment per line for the GTD-5 and its remotes is less than the modeled investment for the 5ESS and the Nortel DMS-100.

Note that both the modeled investments shown below and the relative ordering of the three vendors are company and vendor confidential.

Without Power, With Power,
Test, EF\&I
and IAF Adjustments
Test, EF\&I
and IAF Adjustments


Confidential information on this sheet and in the "Calculations" tab have been been shaded like this: $12,345,678$

In the "Calculations" tab, rows 12 through 101 contain confidential information.
The information in columns $E, F$, and $G$ are access line counts at the wirecenter level and are Verizon confidential because it relates to market size.

The information in columns H and I are Verizon and vendor confidential because it shows switch costs at the wire center level.

## Verizon - Florida

Docket No. 990649B-TP
Dave G. Tucek Exhibit No.
This exhibit is Company and Vendor Confidential
Surrebuttal Exhibit DGT-5
REDACTED VERSION

## Comparison of Modeled Investment per Line

Q. ON A PER-LINE BASIS, DOES ICM-FL MODEL HIGHER SWITCH COSTS FOR THE GTD-5 THAN IT DOES FOR THE 5ESS AND NORTEL SWITCHES?
A. XXX This is shown in the table below. Whether the modeled switch costs include or exclude power, test equipment, and the EF\&I and IAF adjustments, the modeled switch investment per line for the $X X X X X X X X X X$ is less than the modeled investment for the $X X X X X$ and the $X X X X X X$.

Note that both the modeled investments shown below and the relative ordering of the three vendors are company and vendor confidential.

| Without Power, | With Power, |  |
| :---: | :---: | :---: |
|  | Test, EF\&I | Test, EF\&I |
|  | and IAF Adjustments | and IAF Adjustments |
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## Verizon - Florida

This information Company and Vendor Confidential


| LKALFLXA95H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| LKLDFLXA68H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| LKLDFLXN85H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| LKWLFLXA67H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| LUTZFLXA94H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| MNLKFLXA85H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| MYCYFLXA32H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| NGBHFLXA39H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| NPRCFLXA84H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| NRPTFLXA42H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| NRSDFLXA35H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| OLDSFLXA85H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| OSPRFLXA96H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| PLMTFLXA72H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| PLSLFLXA79H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| PNCRFLXA73J | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| PNLSFLXA53H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| PSDNFLXA34H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| RSKNFLXA64H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SEKYFLXA34H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SGBEFLXA36H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SLSPFLXA93H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SNSPFLXA37H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SPBGFLXA89H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SPBGFLXS86H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SPRGFLXA37H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SRSTFLXA95H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SSDSFLXA92H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| STGRFLXA78H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| SWTHFLXA88H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| TAMPFLXX22H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| TRSPFLXA93H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| VENCFLXA48H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| WIMMFLXA63H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| WLCHFLXA97H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| WSSDFLXA87H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| ZPHYFLXA78H | TAMPFLXA01T | GTD-5 | 3 |  |  |  |
| ALTRFLXARSA | BARTFLXA53H | REM GTD-5 | 4 |  |  |  |
| BBPKFFLXARSA | LKWLFLXA67H | REM GTD-5 | 4 |  |  |  |
| BRJTFLXARSA | BARTFLXA53H | REM GTD-5 | 4 |  |  |  |
| BYSHFLXA84H | TAMPFLXX22H | REM GTD-5 | 4 |  |  |  |
| HNCYFLXN424 | HNCYFLXA42H | REM GTD-5 | 4 |  |  |  |
| INLKFLXARSA | LKWLFLXA67H | REM GTD-5 | 4 |  |  |  |
| LKWLFLXERSA | LKWLFLXA67H | REM GTD-5 | 4 |  |  |  |
| MLBYFLXARSA | BARTFLXA53H | REM GTD-5 | 4 |  |  |  |
| PKCYFLXARSA | ABDLFLXA96H | REM GTD-5 | 4 |  |  |  |
| POINFLXARSA | HNCYFLXA42H | REM GTD-5 | 4 |  |  |  |
| PRSHFLXARSA | PLMTFLXA72H | REM GTD-5 | 4 |  |  |  |
| SARKFLXARSA | SRSTFLXA95H | REM GTD-5 | 4 |  |  |  |

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| Lines | L0001 | BM001 |
| :--- | :--- | :--- |
| 481,844 | $51,463,430$ | $100,114,041$ |

91,938 $\quad 11,027,409$ / 4 19,599,710
$1,779,634$ 152,095,271 $+280,9111115$ $49,329-2,476,188 \quad 4,461,049$
$1,828,963 \quad 154,571,459 \quad 285,372,164$

