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February 4, 2004

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VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Docket No. 030852-TP; Surrebuttal Testimony and
Exhibit KWD-4 of Kent Dickerson

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of the Surrebuttal testimony of Kent Dickerson and a public (redacted) version of Dickerson's Exhibit KWD-4 on behalf of Sprint-Florida, Inc. and Sprint Communications Company Limited Partnership. A confidential (non-redacted) version of Dickerson's Exhibit KWD-4 is being contemporaneously filed under a separate cover and will be served to persons who have executed a non-disclosure agreement.

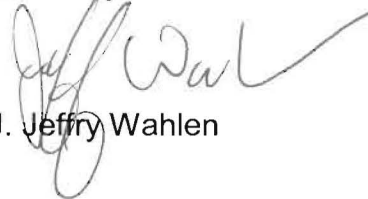
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Thank you for your assistance in this matter.

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Sincerely,


J. Jeffrey Wahlen

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Enclosures

cc: All Parties of Record (w/encls.)

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1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **SURREBUTTAL TESTIMONY**

3 **OF**

4 **KENT W. DICKERSON**

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Q. Please state your name, business address, employer and current position.

A. My name is Kent W. Dickerson. My business address is 6450 Sprint Parkway, Overland Park, KS 66251. I am employed as Director – Cost Support for Sprint/United Management Company.

Q. Are you the same Kent W. Dickerson who caused Rebuttal Testimony to be filed in this case?

A. Yes.

Q. What is the purpose of your Surrebuttal Testimony?

A. The purpose of my Surrebuttal testimony is to respond to the rebuttal testimonies of BellSouth Witnesses Shelly W. Padgett and Dr. Andy Banerjee.

1 **Connection of UNE Loops to CLEC Dial-Tone Switch is not Dedicated Transport**

2

3 **Q. On page 3 of her rebuttal testimony Ms. Padgett discusses the FCC TRO rule**
4 **319(e). Do you agree with Ms. Padgett's interpretation of this rule?**

5 A. No, I do not. In Exhibit KWD-1 to my Rebuttal testimony, I illustrated how CLEC
6 collocations and the associated facilities exiting those locations are most commonly
7 used to establish dial tone connections between UNE Loops and the CLEC's dial-tone
8 switch. Ms. Padgett is attempting to argue that all such facilities constitute self-
9 deployed dedicated transport facilities between the two collocated wire centers
10 irrespective of whether the CLEC has actually deployed dedicated transport circuits.

11

12 The clear intent of the FCC rule was to convey that while the end points of the route in
13 question must be the same; the CLECs transport route does not have to physically
14 duplicate the exact route of the ILEC's transport facilities. It is illogical to interpret
15 the rule as allowing the ILEC to confuse a CLEC's ability to switch traffic from its
16 switch location, with a dedicated transport facility connecting ILEC wire centers, as
17 Ms. Padgett attempts to argue in her testimony. Ms. Padgett's interpretation leads to
18 her extreme and incorrect conclusion that because CLECs connect UNE Loops to their
19 switch and switches can be used to direct calls anywhere in the world, all transport
20 routes would then become possible. This idea is impossible to reconcile with industry
21 standard distinctions between switched traffic and dedicated transport, as well as the
22 FCC requirement for route specific analysis and confirmation of actual working,
23 bandwidth specific, dedicated transport circuits.

24

1 **Q. Is there discussion within the FCC TRO which supports your views that the FCC**
2 **does not equate loop connections to dial-tone switches with dedicated transport**
3 **routes connecting ILEC wire centers, as Ms. Padgett has done?**

4
5 A. Yes. At paragraph 367 the FCC TRO reads: "These backhaul facilities from
6 incumbent LEC networks to competitors' networks are distinguished from other
7 transport facilities because competing carriers have some control over the location of
8 their network facilities that is lacking with regard to transport as we define it here." At
9 paragraph 370 the FCC TRO then discusses CLEC self-deployed transport as follows:
10 "When carriers self-deploy transport facilities, they typically deploy fiber rings that
11 connect several incumbent LEC central offices in a market." It is apparent the FCC
12 distinguishes between a facility connecting a loop to a switch and true dedicated
13 transport facilities carrying traffic between ILEC central offices. This is a distinction
14 that is apparently lost on Ms. Padgett and BellSouth's associated list of 718 routes
15 claimed to be CLEC self-deployed transport. I will not repeat the facts presented in
16 my rebuttal testimony, but Ms. Padgett's mis-characterization of these facilities results
17 in the dramatic overstatement of true CLEC self-deployed dedicated transport routes
18 as pointed out to the Commission by numerous CLECs filing testimony in this case.

19
20 **Q. Do CLECs who have truly self-deployed dedicated transport or high capacity**
21 **loops have any logical incentive to deny this fact?**

22
23 A. No. It is important to note that CLECs who have truly satisfied their network
24 transport requirements by self deploying dedicated transport have no incentive to hide
25 that fact. No CLEC who has their own facilities would have any need or desire to

1 make UNEs available on a specific route that they do not intend to purchase. To do so
2 would only result in the continued availability of UNEs to other CLECs competing for
3 the same finite customer base in that market. Thus, I encourage the Commission to
4 give heavy weight to the testimony of CLECs disputing BellSouth's list of locations
5 and routes as explained more fully in my rebuttal testimony.

6

7 **Q. Can you provide examples where BellSouth's unfounded assumptions have**
8 **resulted in erroneous claims of CLEC self-provisioned transport routes?**

9

10 A. Yes. Ms. Padgett's Supplemental Testimony contained an Exhibit SWP-8, which
11 listed 718 individual transport routes claimed to satisfy the FCC TRO for self
12 provisioned triggers. I discussed in my Rebuttal Testimony at pages 14-16, how
13 BellSouth's use of unfounded, broad-brush, assumptions resulted in numerous
14 transport routes where BellSouth erroneously identified Sprint as having self-deployed
15 dedicated transport, when in fact Sprint has not. Further investigation into the "Sprint"
16 routes listed in Exhibit SWP-8 reveals yet another ten routes in the Orlando area that
17 do not satisfy the FCC TRO self-provisioned criteria. I have prepared an Exhibit
18 KWD-4 that lists those additional routes. Column D of Exhibit KWD-4 shows the
19 associated UNE Billing Account Number for each route, which demonstrates the
20 enabling dark fiber is being purchased by Sprint from BellSouth on a month-to-month
21 UNE basis. These routes purchased on a UNE basis, obviously does not meet the
22 FCC's criteria for self-deployed transport triggers. When combined with the errors
23 discussed in my Rebuttal Testimony at pages 14-16, I have demonstrated the
24 overwhelming majority of BellSouth's claimed transport trigger routes for Sprint, in
25 fact do not meet the FCC TRO requirements. I believe this well illustrates for the

1 Commission why BellSouth's approach must be rejected, and until and unless the
2 necessary route-specific facts are provided and verified, BellSouth's transport UNE
3 obligations should continue for each route.
4

5 **Q. At page 7 of her testimony, Ms. Padgett discusses the FCC rule 51.319(a)(ii),**
6 **(5)(i)(B) and concludes, "This distinction indicates that a customer location is a**
7 **building, not an individual unit or suite in a multi-unit building." Is Ms.**
8 **Padgett's conclusion correct?**

9
10 **A.** No. The FCC Order Ms. Padgett references reads as follows: "(2) The competing
11 provider has access to the entire customer location, **including each individual unit**
12 **within that location.**" (Emphasis added.). Ms. Padgett has mis-characterized this
13 clear FCC criterion and has failed to properly apply this necessary test to her list of
14 high capacity loop locations. It is further illogical to suggest the FCC rules are not
15 concerned as to whether CLECs can actually access individual customers at a location,
16 when the lack of that ability renders their cable leading to that location an effectively
17 useless cost with no associated revenue opportunity.

18
19
20 **Q. On page 6 of her Rebuttal Testimony, Ms. Padgett says, "Establishing a**
21 **connection between two operationally ready collocations via a switch or hub**
22 **typically requires only a software-based configuration of a circuit." Do you agree**
23 **CLECs can self-deploy dedicated transport as simply as Ms. Padgett's single**
24 **sentence asserts?**

25

1 A. No, I do not. If the real world hurdles to CLEC self-deployed dedicated transport
2 were as wonderfully simplistic as Ms. Padgett describes, it leaves the rest of us
3 wondering: “Why then would a CLEC not always deploy their own facilities versus
4 paying their principle competitor for a network component they could so easily self-
5 provision?” The answer is that CLEC self-deployment of dedicated transport is not
6 nearly as wonderfully simple as Ms. Padgett suggests.

7

8 **Q. Please describe the real-world complexities a CLEC must overcome in order to**
9 **self-deploy and maintain an operationally ready dedicated transport route.**

10

11 A. First, the CLEC must design, engineer, purchase and install additional equipment at
12 each collocation site and their intermediate hub site in the form of OCN fiber optic
13 terminals, DS3 cards, add/drop multiplexers and DS1 cards. Thus, immediate and
14 substantial capital and labor are required along with the associated construction
15 interval.

16

17 The ongoing design, equipment capacity monitoring and inventory management,
18 installation and maintenance of the OCN terminals themselves, and the associated
19 dedicated transport circuits riding those terminals, requires that CLECs have
20 sophisticated OSSs and highly skilled employees supplied with ongoing training as
21 needed.

22

23 CLECs will have to deploy a circuit specific alarm monitoring capability and the
24 associated highly skilled employees to ensure the 24/7 operational capabilities of each
25 DS1 and DS3 circuit contained on each dedicated transport routes. Associated with

1 this a CLEC must hire, train and deploy a highly skilled employee workforce capable
2 of engineering, installing, repairing and maintaining each transport terminal equipment
3 item again on a 24/7 basis.

4
5 The employee workforce requirements then yield increased complexities and
6 workloads associated with human resources and legal matters such as hiring,
7 compensation, taxes, etc. which must be adequately staffed and handled yielding
8 additional costs and complexities to the CLEC's start-up operation.

9
10 While I am sure I have not exhaustively explained all of the incremental impacts to the
11 CLEC's business associated with self-deployment of dedicated transport, I think it is
12 obviously much more complex and costly than Ms. Padgett's single sentence argues.

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19 **BellSouth's Potential Deployment – Loop and Transport Case Lacks Required**
20 **Location Specific Analysis**

21
22 **Q. Dr. Banerjee's Supplemental Testimony contained a list of 421 high capacity loop**
23 **locations and 155 transport routes claimed to be suitable for potential**
24 **deployment. Have you been able to examine any evidence supporting Dr.**
25 **Banerjee's claim?**

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A. No. As I discussed in Rebuttal Testimony at page 26, BellSouth's filing contained an egregious lack of evidence to support their claim locations and routes. Unfortunately, BellSouth has continued to thwart subsequent attempts by CLECs to uncover any support for their claim through the discovery process. For example, in response to ATT 1st interrogatories No. 5 BellSouth claims the very GeoLit Plus Report referenced by and relied upon Ms. Padgett in her direct testimony to determine high capacity loop locations to somehow be "... not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence." Continuing within ATT's 1st Set of Interrogatories, No. 16 subpart (a) requested the "... 'wireline telecommunications' expenditures utilized in Dr. Banerjee's analysis for each of the 387 building locations. (See Dr. Banerjee's 12/22/ Direct Testimony at page 8, lines 16-20)." ATT requested the very revenues that Dr. Banerjee claims to rely upon in his potential deployment NPV analysis and yet BellSouth's response reads, "BellSouth objects to Interrogatory No. 16 subpart (a) on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence."

BellSouth continues to stymie the evidentiary process in ATT Request No. 20 which requested, "Refer to Dr. Banerjee's Direct Testimony at page 8, lines 16-20. Please identify and supply the specific products, reports, and/or data from TNS Telecoms that was used in the potential deployment analysis for loops in Dr. Banerjee's analysis." Again, BellSouth's response demonstrates their willingness to frustrate the Commission's investigation as evidenced in their response to this straightforward request as follows, "BellSouth objects to Interrogatory No. 20 on the grounds that is

1 not relevant to the subject matter of this docket and is not reasonably calculated to lead
2 to the discovery of admissible evidence.” Although certainly not an exhaustive list of
3 examples, I would draw attention to yet another refusal by BellSouth to requested
4 information in ATT’s No. 27 which requested, “For the locations identified in
5 Interrogatory No. 26, provide the legally enforceable terms (“Agreements”) for
6 BellSouth gaining access to customers in the locations.” As I discussed in my rebuttal
7 testimony, CLEC access to building locations is a critical operational and cost
8 component of the FCC required location specific fact determination and yet
9 BellSouth’s response reads, “BellSouth objects to Interrogatory No 27 insofar as it is
10 not reasonably calculated to lead to the discovery of admissible evidence and is not
11 relevant to the purposes of Dr. Banerjee’s Direct Testimony.”

12

13 **Q. Has the interrogatory process provided any useful information relevant to**
14 **BellSouth’s potential deployment of high capacity loops case?**

15

16 A. Yes. ATT’s 1st Interrogatories No. 16 requested, “For the 387 locations identified in
17 Dr. Banerjee’s Direct Testimony that BellSouth indicates meets its potential
18 deployment analysis for loops please state: (C) for each building the number of
19 CLECs that have actually self-provisioned loop facilities to that location.” BellSouth
20 response reveals that Dr. Banerjee made no effort to understand if even the first CLEC
21 (nor the second of two CLECs claimed to feasible) has in fact deployed high capacity
22 loops to the each specific location as follows, “The information sought in this regard
23 was not separately produced. Dr. Banerjee’s potential deployment analysis produced a
24 list of buildings to which at least two CLECs could deploy loops on a positive Net
25 Present Value basis. Although it was possible, in principle, to separate out, within this

1 list of buildings, the CLECs that have actually deployed loops from those that could
2 potentially deploy, no effort was made to develop a comprehensive list of buildings
3 that have actually deployed loops, regardless of whether they proved to Net Present
4 Value positive upon doing so.” Obviously, the best evidence that something can be
5 done is evidence that someone has already done it, and yet BellSouth admits to
6 making no effort to provide this relevant, location specific, data.
7

8 **Q. Have Sprint’s discovery requests to BellSouth provided any of the information**
9 **missing from BellSouth’s Direct, Supplemental and Rebuttal Testimony filings?**
10

11 A. Perhaps, but as those responses were not received until Feb. 3rd, 2004 it is not possible
12 to comment on them at this time. It is important to note that all CLECs and
13 Commission Staff has been placed in an unworkable position of having to mine
14 information from BellSouth, through a 20 day discovery process, that should have
15 been filed with BellSouth’s Direct Testimony. I would additionally point out that
16 Sprint’s discovery, while not worded exactly as ATT’s, sought very similar
17 information that would have been available to Sprint much sooner, had BellSouth not
18 responded in the unreasonable manner discussed above.
19

20 **Q. In your Rebuttal Testimony you discussed at page 31, your concerns regarding**
21 **BellSouth’s use of \$60,000 revenue threshold that must then support the presence**
22 **of three competing providers. Have you been able to confirm your concern in**
23 **this area?**
24

1 A. Yes. BellSouth's response to ATT 1st Interrogatories No. 23 confirms that
2 BellSouth's \$60,000 revenue threshold is the entire revenue opportunity at each
3 location as follows, "(c) Identify only the buildings in which the aggregate monthly
4 spending of tenants/occupants on wireline telecommunications services exceeds
5 \$5,000 *and* the number of tenants is three or more." As I discussed in my rebuttal
6 testimony, this revenue threshold is grossly insufficient to support the construction
7 costs of two competing CLECs and the already existing ILEC.

8

9 **Q. In your Rebuttal Testimony you discussed the complete absence of revenue, cost**
10 **and NPV data in Dr. Banerjee's Direct and Supplemental Testimony. Has the**
11 **discovery process allowed you to progress your evaluation of BellSouth's**
12 **approach?**

13

14 A. Yes. BellSouth's response to ATT Interrogatory No. 33 reveals both a lack of the
15 necessary location specific data required by the FCC TRO as well as an unsound
16 overly broad approach to cost estimation as follows, "Dr. Banerjee does not have
17 specific information regarding the availability of, or constraints on, capacity. For the
18 purposes of his testimony, he assumed that a CLEC that has exhausted its capacity
19 would upgrade its network. Although Dr. Banerjee's testimony reports only the cost
20 of extending a loop from the node to the new building, any cost to upgrade capacity
21 would presumably be captured under the "COGS and Other Network Costs" item
22 which, as the testimony explains, was assumed to be 25% of retail revenues." Dr.
23 Banerjee's response reveals he has not confirmed the BACE model computations he
24 claims to rely upon even include the necessary costs of capacity additions and rather
25 he only presumes that to be the case. An approach such as BellSouth's, which relies

1 upon two unfounded assumptions and one unfounded presumption, is the functional
2 opposite of the required FCC location specific analysis, and BellSouth's potential
3 deployment analysis is completely unsubstantiated and unreliable.

4

5 **Q. Please summarize your Surrebuttal Testimony.**

6

7 A. BellSouth's lists of alleged high capacity loops locations and dedicated transport
8 routes claimed to satisfy the FCC's trigger, wholesale and potential deployment
9 criteria are not supported by substantial competent evidence. Rather, they are based
10 upon a strung together series of broad, unsubstantiated assumptions that are disputed
11 and proven false, throughout the CLEC testimony in this case. Similarly, BellSouth's
12 potential deployment testimony was not supported by any filed evidence and is also
13 constructed using a series of unconfirmed and overly broad set of assumptions.
14 BellSouth's attempts to overcome the FCC's national findings of impairment for both
15 high capacity loops and dedicated transport fall wholly short of the location-specific,
16 fact based analysis the FCC TRO requires and must be rejected on that basis.

17

18

19 **Q. Does this conclude your Surrebuttal Testimony?**

20

21 A. Yes.

BellSouth Dark Fiber Billing Data - Sprint

A	B	C	D	E	F	G	(E x F x G) H
A Location	Z Location	Route	BellSouth BAN No.	Fiber	Miles	Bell South UNE Rate per Fiber Mile	Total Mileage

Self Provisioned Routes Identified in Supp. Direct Exhibit SWP-8 That Are Interconnected with Bell South Dark Fiber

A Location	Z Location	Route

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the Surrebutal Testimony of Kent Dickerson and a public (redacted) version of Dickerson's Exhibit KWD-4 has been furnished via Electronic Mail, U. S. Mail or Hand Delivery (*) this 4th day of February, 2004, to the following:

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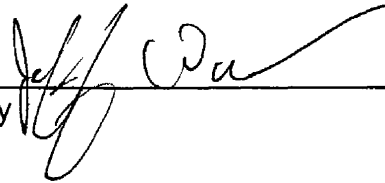
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A handwritten signature in black ink, appearing to read 'Charles J. Beck', is written over a horizontal line. The signature is stylized and cursive.