



RECEIVED-FFSC
98 OCT -1 PM 3:49

Susan S. Masterton
Attorney

ORIGINAL

External Affairs
P.O. Box 2214
Tallahassee, FL 32311
Phone 904-991-1340
Fax 904-991-1341
www.flpublicservice.com

REC. AND REPORTING

October 1, 1998

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

Re: Docket No. 980696-TP

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of Sprint-Florida, Inc.'s Corrected Footnotes of Carl H. Laemmler.

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

Thank you for your assistance in this matter.

Sincerely,

RECEIVED & FILED
[Signature]
FFSC BUREAU OF RECORDS

[Signature]
Susan S. Masterton

- ACK
- AFA 2
- APP _____
- CAE _____
- CMU Ryg
- CTR _____
- EAG _____
- LEG 2
- LIN ty + 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE
10829 OCT-1 98
REC'D BY: [unclear]

Exhibit: CHL Rebuttal - 1
Footnotes

ORIGINAL

- ¹ *Bellcore Notes on the Networks, Distribution, SR-2275, Issue 3, December 1997, Sec. 12.1.4, page 12-5.*
- ² The current version of this document, *Bellcore Notes on the Networks, SR-2275, Issue 3, December 1997*, is now available. With minor punctuation changes, Section 12.1.3 is unchanged.
- ³ *Report and Order, FCC CC Docket No. 96-45, page 138*
- ⁴ *Bellcore Notes on the LEC Networks, Issue 2, April 1994, Section 12.1.3, page 12-4.*
- ⁵ [CREG: Concentrated Range Extender with Gain, MLRD: Modified Long Route Design]
- ⁶ *Bellcore Notes on the Networks, SR-2275, Issue 3, December 1997, Section 12.1.4, page 12-5*
- ⁷ *Bellcore Notes on the Networks, SR-2275, Issue 3, December 1997, Table 7-11 page 7-70.*
- ⁸ *Bellcore Notes on the Networks, SR-2275, Issue 3, December 1997, Section 7.15.5, page 7-71.*
- ⁹ *Bellcore Notes on the Networks, SR-2275, Issue 3, December 1997, Section 12.1.4, page 12-5*
- ¹⁰ AT&T Network Systems Customer Education and Training, *Outside Plant Engineering Handbook*, AT&T, 1994, page 13-1.
- ¹¹ AT&T Network Systems Customer Education and Training, *Outside Plant Engineering Handbook*, AT&T, 1994, page 3-16.
- ¹² AT&T Nevada's Response to Sprint's 1st Set, Docket 98-6005, July 17, 1998, Nevada Request No. 139
- ¹³ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 152
- ¹⁴ *1997 Fact Finder*, Florida Power Corporation, 1997
- ¹⁵ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 152
- ¹⁶ AT&T Network Systems Customer Education and Training, *Outside Plant Engineering Handbook*, AT&T, 1994, page 9-6.
- ¹⁷ North Carolina, Docket No. P-100, Sub 133b, Transcript Volume III, page 23
- ¹⁸ *Ibid.*, page 29-31
- ¹⁹ AT&T Nevada's Response to Sprint's 1st Set, Docket 98-6005, July 17, 1998, Nevada Request No. 136
- ²⁰ AT&T Nevada's Response to Sprint's 1st Set, Docket 98-6005, July 17, 1998 Nevada Request No. 145
- ²¹ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 155-156
- ²² AT&T Nevada's Response to Sprint's 1st Set, Docket 98-6005, July 17, 1998, Nevada Request No. 146
- ²³ North Carolina, Docket No. P-100, Sub 133b, Transcript Volume III, page 22
- ²⁴ North Carolina, Docket No. P-100, Sub 133b, Transcript Volume III, page 22
- ²⁵ North Carolina, Docket No. P-100, Sub 133b, Transcript Volume III, page 25
- ²⁶ North Carolina, Docket No. P-100, Sub 133b, Transcript Volume III, page 25.
- ²⁷ *National Electrical Safety Code*, Section ,I P. 010.Purpose , page 1
- ²⁸ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 152
- ²⁹ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 156
- ³⁰ The HIP specifically - and correctly - states that the, "Hatfield Model does not assume that conduit is shared". Since both BCPM and HAI cost out only the actual conduit used by the LEC, and not the cost of the additional, leased conduit, the cost of the additional conduit cannot be "share away". See HIP, Appendix B, B.1. Page 152.
- ³¹ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 151
- ³² *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 151
- ³³ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 151
- ³⁴ *National Electrical Safety Code*, IEEE, 1997 Edition, 320.A.1.a, page 176
- ³⁵ *National Electrical Safety Code*, IEEE, 1997 Edition, 320.A.1, page 176
- ³⁶ *National Electrical Safety Code*, IEEE, 1997 Edition, 320.B.2, page 177
- ³⁷ *National Electrical Safety Code*, IEEE, 1997 Edition, 320.B.A, page 176
- ³⁸ *National Electrical Safety Code*, IEEE, 1997 Edition, 320.B.5, page 176

DOCUMENT NUMBER-DATE

10829 OCT-1 88

FPSO-RECORDS/REPORTING

Exhibit: CHL Rebuttal - 1

Footnotes

- ³⁸ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 155
- ³⁹ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, Appendix B, page 152
- ⁴⁰ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, 2.A.1, page 24, 26
- ⁴¹ AT&T Network Systems Customer Education and Training, *Outside Plant Engineering Handbook*, AT&T, 1994, page 3-2.
- ⁴² *Hatfield Model Description 5.0*, HAI Consulting, Inc., January 5, 1998, Section 6.3.5, page
- ⁴³ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, 6.3.4, page 39
- ⁴⁴ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, 2.3.2, page 21, footnote
- ⁴⁵ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, 2.3.2, page 22 & 3.4.1, p. 60
- ⁴⁶ AT&T Nevada's Response to Sprint's 1st Set, Docket 98-6005, July 17, 1998 Nevada Req. No. 52 & 53
- ⁴⁷ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, § 2.9, page 42
- ⁴⁸ Document provided by AT&T Consultant, Mr. John Donovan, Dated 2/13/98
- ⁴⁹ Work time from AT&T NRCM Model, NTAB 2.2 Att. B, Page 6 multiplied by a Sprint loaded labor rate of \$64.45.
- ⁵⁰ *Hatfield Model Release 5.0 Inputs Portfolio*, December 31, 1997, 2.6.2, page 33

**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
U.S. Mail this 1st day of October, 1998 to the following:

Senate
Regulated Industries Committee
404 South Monroe Street
John Guthrie
Room 326 Senate Office Building
Tallahassee, Florida 32399-1100

Booter Imhof
Research Director for
House Utilities &
Communications Committee
428 House Office Building
425 South Monroe Street
Tallahassee, FL 32399-1300

AT&T Communications of the
Southern States, Inc.
Rhonda Merritt/Tracy Hatch
101 North Monroe Street
Suite 700
Tallahassee, Florida 32301-1549

Hopping Law Firm
Richard Melson
Post Office Box 6526
Tallahassee, Florida 32314

MCI Telecommunications Corp.
Thomas K. Bond
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Monica Barone, Esquire
Sprint
3100 Cumberland Circle
Atlanta, GA 30339

Lynne Brewer
Northeast Florida Telephone Company
P.O. Box 485
MacClenny, FL 32063

Everett Boyd
Ervin Law Firm
P.O. Drawer 1170
Tallahassee, Florida 32302

Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309

David Erwin, Esquire
Attorney at Law
127 Riversink Road
Crawfordville, Florida 32327

Donna Canzano, Esquire
Wiggins & Villacorta
P.O. Drawer 1657
Tallahassee, Florida 32302

John Fons, Esquire
Ausley & MacMullen
227 South Calhoun Street
Tallahassee, Florida 32301

Kimberly Caswell, Esquire
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, Florida 33601

David Daniel
316, The Capitol
402 S. Monroe Street
Tallahassee, Florida 32399-1300

Mark Dunbar, Esquire
Pennington, Moore Wilkinson, & Dunbar
P.O. Box 10095
Tallahassee, Florida 32302

Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
Live Oak, Florida 32060-0550

John Ellis, Esquire
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
Post Office Box 551
Tallahassee, Florida 32302-0551

Mark Ellmer
GTC Inc.
P.O. Box 220
Port St. Joe, Florida 32457

Kelly Goodnight
Frontier Communications
180 S. Clinton Avenue
Rochester, NY 14646

Angela Green
Fla. Public Tele. Association
125 S. Gadsden Street #200
Tallahassee, Florida 32301-1525

Patricia Greene
Holland Law Firm
315 S. Calhoun Street, Suite 600
Tallahassee, Florida 32301

Stan Greer
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Michael Gross, Asst. Attorney General
Office of the Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399-1050

Mike Lacour
GTC Inc.
P.O. Box 220
Port St. Joe, Florida 32457

Ken Hoffman, Esquire
Rutledge Ecenia, Underwood Purnell &
Hoffman, PA
P.O. Box 551
Tallahassee, Florida 32302-0551

Doc Horton, Esquire
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, Florida 32302

Bill Huftenhower
Vista-United
P.O. Box 10180
Lake Buena Vista, FL 32830

Thomas K. Bond
MCI
780 Johnson Ferry Road
Suite 800
Atlanta, GA 30342

Susan Langston
FTIA
P.O. Box 1776
Tallahassee, Florida 32302-1776

Mike Loconto
Smith, Bryan & Myers
311 E. Park Avenue
Tallahassee, Florida 32301

Tom McCabe
TD3 Telecom
P.O. Box 189
Quincy, Florida 32353-0189

Elise McCabe
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Jim McGinn
ITS Telecommunications Systems, Inc.
P.O. Box 277
Indiantown, Florida 34956

Joe McGlothlin
McWhirter, Reeves, McGlothlin, Davidson, Rie
& Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

Ben Ochshorn
Florida Legal Services
2121 Delta Blvd
Tallahassee, Florida 32303

Frank Meiners
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Ed Paschall
AARP
1923 Atapha Nene
Tallahassee, Florida 32301-5850

Earl Poucher
Office of Public Counsel
C/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, Florida 32399-1400

Julie S. Myers
Smith, Bryan & Myers
311 East Park Avenue
Tallahassee, Florida 32301

Floyd Self, Esquire
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, Florida 32301

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111W. Madison Street, Room 812
Tallahassee, Florida 32399-1400

Richard Spears
Community Assoc. Institute
9132 Ridge Pine Trail
Orlando, Florida 32819

Bill Thomas
GTC, Inc.
P.O. Box 220
Port St. Joe, Florida 32456

Patrick Wiggins, Esquire
Wiggins & Villacorta
P.O. Draw 1657
Tallahassee, Florida 32302

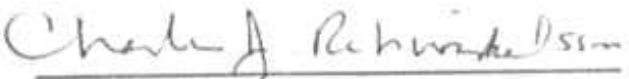
Nancy White
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301

Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

David Swafford
Pennington, Moore, Wilkinson, & Dunbar
P.O. Box 10095
Tallahassee, Florida 32302

Michael Twomey, Esq.
8903 Crawfordville Road
Tallahassee, Florida 32310

Jeff Wahlen, Esquire
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, Florida 32301



Charles J. Rehwinkel
Attorney For
Sprint-Florida, Inc.
P.O. Box 2214
MS: FLTLHO0107
Tallahassee Florida 32316-2214

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111W. Madison Street, Room 812
Tallahassee, Florida 32399-1400

Richard Spears
Community Assoc. Institute
9132 Ridge Pine Trail
Orlando, Florida 32819

Bill Thomas
GTC, Inc.
P.O. Box 220
Port St. Joe, Florida 32456

Patrick Wiggins, Esquire
Wiggins & Villacorta
P.O. Draw 1657
Tallahassee, Florida 32302

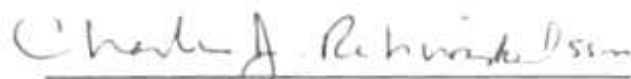
Nancy White
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301

Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

David Swafford
Pennington, Moore, Wilkinson, & Dunbar
P.O. Box 10095
Tallahassee, Florida 32302

Michael Twomey, Esq.
8903 Crawfordville Road
Tallahassee, Florida 32310

Jeff Wahlen, Esquire
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, Florida 32301



Charles J. Rehwinkel
Attorney For
Sprint-Florida, Inc.
P.O. Box 2214
MS: FLTLHO0107
Tallahassee Florida 32316-2214