State of Florida

ORIGINAL

Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: November 21, 2002
TO: Blanca S. Bayó, Commission Clerk and Administrative Services Director
FROM: David L. Dowds, Public Utilities Supervisor, Division of Competitive Markets & Enforcement
RE: Docket No. 990649B- Investigation Into Pricing of Unbundled Network Elements (Sprint/Verizon Track)

Attached are four documents that were provided to the Commissioners. These documents contain additional analysis related to staff's recommendations concerning Sprint-Florida. Please place these documents in docket file 990649B-TP. If you have any questions, please call me.

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH

A.1:1

2-Wire Analog Voice Grade Loop - Service Level 1 +/- 20%

	A	B	C	D	E	F	G
1	Wire Center	Total Number of Loops	Monthly Cost per Line (TELRIC)	Total Monthly Cost (TELRIC)			
2	MTLDFLXADS1	13,828	$10.32	$ 142,704.96			
3	TLHSFLXADS0	77,168	$10.56	$ 814,894.08		80%	$ 8.65
4	TLHSFLXERS0	11,179	$11.60	$ 129,676.40	$10.82	120%	$ 12.98
5	SHLMFLXADS0	9,746	$12.66	$ 123,384.36			
6	WNPKFLXADS1	48,235	$14.54	$ 701,336.90			
7	FTWBFLXADS0	23,487	$15.59	$ 366,162.33			
8	FTWBFLXBDS0	20,900	$15.81	$ 330,429.00			
9	CYLKFLXBRS0	30,176	$15.92	$ 480,401.92			
10	FTMYFLXCDS2	38,646	$16.05	$ 620,268.30			
11	ALSPFLXADS0	54,425	$16.22	$ 882,773.50			
12	NPLSFLXDDS0	63,565	$16.22	$ 1,031,024.30			
13	LKBRFLXADS1	45,503	$16.33	$ 743,063.99		80%	$ 14.10
14	NNPLFLXADS1	62,624	$16.54	$ 1,035,800.96	$17.63	120%	$ 21.16
15	VLPRFLXADS0	15,510	$16.97	$ 263,204.70			
16	TLHSFLXBDS0	26,193	$16.99	$ 445,019.07			
17	FTMYFLXADS0	24,419	$17.45	$ 426,111.55			
18	CSLBFLXADS1	21,375	$17.61	$ 376,413.75			
19	DESTFLXADS0	24,669	$18.31	$ 451,689.39			
20	FTMBFLXARS0	12,442	$18.45	$ 229,554.90			
21	GLRDFLXADS0	47,832	$18.55	$ 887,283.60			
22	CPCRFLXADS0	35,895	$18.57	$ 666,570.15			
23	VLPRFLXBRS0	7,881	$18.98	$ 149,581.38			
24	BNSPFLXADS1	60,794	$19.50	$ 1,185,483.00			
25	LDLKFLXARS0	24,782	$19.65	$ 486,966.30			
26	ORCYFLXADS0	13,755	$19.84	$ 272,899.20			
27	WNDRFLXARS0	10,319	$20.25	$ 208,959.75			
28	BCGRFLXARS1	3,211	$20.41	$ 65,536.51			
29	FTWBFLXCRS0	4,698	$20.64	$ 96,966.72			
30	TLHSFLXDDS0	44,310	$20.85	$ 923,863.50			
31	OCALFLXCRS0	11,020	$20.88	$ 230,097.60			
32	KSSMFLXDRS0	15,039	$20.89	$ 314,164.71			
33	WNGRFLXADS0	25,720	$21.00	$ 540,120.00			
34	MOISFLXADS1	24,089	$21.40	$ 515,504.60			
35	NFMYFLXADS0	17,528	$21.44	$ 375,800.32			
36	NPLSFLXCDS0	38,278	$22.01	$ 842,498.78			
37	CLMTFLXADS0	23,648	$22.18	$ 524,512.64			
38	APPKFLXADS1	34,593	$22.61	$ 782,147.73			
39	KSSMFLXBDS1	15,243	$22.68	$ 345,711.24			
40	CPCRFLXBDS1	30,799	$22.69	$ 698,829.31			
41	TLHSFLXHDS0	38,021	$22.83	$ 868,019.43			
42	LSBGFLXADS0	11,992	$22.84	$ 273,897.28		80%	$ 19.75
43	TLHSFLXCDS0	27,025	$23.05	$ 622,926.25	$24.68	120%	$ 29.62
44	OCALFLXADS0	62,998	$23.95	$ 1,508,802.10			
45	KSSMFLXADS0	50,046	$23.95	$ 1,198,601.70			
46	ORCYFLXCRS0	15,533	$24.33	$ 377,917.89			
47	GLGCFLXADS0	35,678	$25.02	$ 892,663.56			
48	TVRSFLXADS0	16,016	$25.26	$ 404,564.16			

2-Wire Analog Voice Grade Loop - Service Level 1

	A	B	C	D	E	F	G
1	Wire Center	Total Number of Loops	Monthly Cost per Line (TELRIC)	Total Monthly Cost (TELRIC)			
49	KSSMFLXCRS1	10,391	$25.41	$ 264,035.31			
50	OCALFLXBDS0	33,311	$25.45	$ 847,764.95			
51	PTCTFLXADS0	57,531	$25.64	$ 1,475,094.84			
52	BVHLFLXADS0	16,138	$25.95	$ 418,781.10			
53	MTDRFLXARS0	17,073	$25.99	$ 443,727.27			
54	SVSSFLXARS0	7,695	$26.66	$ 205,148.70			
55	TLHSFLXFDS0	27,051	$26.85	$ 726,319.35			
56	BLVWFLXADS0	23,864	$27.12	$ 647,191.68			
57	SNISFLXADS0	12,870	$27.42	$ 352,895.40			
58	CRVWFLXADS0	19,065	$27.73	$ 528,672.45			
59	CYLKFLXADS0	43,181	$28.37	$ 1,225,044.97			
60	NFMYFLXBRS0	18,544	$28.37	$ 526,093.28			
61	FTMYFLXBRS0	16,202	$28.48	$ 461,432.96			
62	CHSWFLXARS0	4,655	$28.79	$ 134,017.45			
63	DDCYFLXADS1	13,655	$29.32	$ 400,364.60			
64	SBNGFLXADS1	29,570	$29.49	$ 872,019.30			
65	MTVRFLXARS0	1,813	$30.07	$ 54,516.91			
66	ESTSFLXARS0	20,022	$30.15	$ 603,663.30			
67	LKHLFLXARS0	2,216	$30.20	$ 66,923.20			
68	SGBHFLXARS0	6,218	$31.09	$ 193,317.62		80%	$ 26.89
69	PNGRFLXADS1	29,036	$32.23	$ 935,830.28	$33.61	120%	$ 40.34
70	SNRSFLXARS0	6,305	$32.55	$ 205,227.75			
71	LHACFLXADS0	18,138	$32.59	$ 591,117.42			
72	CPHZFLXADS0	12,523	$32.67	$ 409,126.41			
73	HOWYFLXARS0	1,894	$33.33	$ 63,127.02			
74	AVPKFLXADS0	12,155	$34.41	$ 418,253.55			
75	MRNNFLXADS0	12,052	$34.48	$ 415,552.96			
76	INVRFLXADS1	29,913	$35.25	$ 1,054,433.25			
77	CRRVFLXADS0	16,311	$35.61	$ 580,834.71			
78	PNISFLXADS0	9,803	$36.04	$ 353,300.12			
79	FTMDFLXARS0	3,443	$36.61	$ 126,048.23			
80	SVSPFLXARS0	5,875	$38.97	$ 228,948.75			
81	STCDFLXARS0	23,237	$39.05	$ 907,404.85			
82	HMSPFLXARS0	11,032	$39.41	$ 434,771.12			
83	SNANFLXARS0	4,142	$43.05	$ 178,313.10			
84	WCHLFLXADS0	7,603	$43.39	$ 329,894.17			
85	GVLDFLXARS0	6,178	$44.56	$ 275,291.68			
86	STRKFLXADS0	7,992	$44.65	$ 356,842.80			
87	MDSNFLXADS0	5,424	$45.89	$ 248,907.36			
88	WLWDFLXARS0	9,065	$46.09	$ 417,805.85			
89	ARCDFLXADS0	15,733	$46.22	$ 727,179.26			
90	DFSPFLXADS0	9,776	$46.89	$ 458,396.64		80%	$ 39.85
91	SLHLFLXARS0	5,567	$47.84	$ 266,325.28	$49.81	120%	$ 59.78
92	UMTLFLXARS0	8,567	$48.57	$ 416,099.19			
93	CFVLFLXADS0	7,610	$49.06	$ 373,346.60			
94	OKLWFLXADS0	4,454	$49.72	$ 221,452.88			
95	OKCBFLXADS1	24,148	$49.76	$ 1,201,604.48			

	A	B	C	D	E	F	G
1	Wire Center	Total Number of Loops	Monthly Cost per Line (TELRIC)	Total Monthly Cost (TELRIC)			
96	TLHSFLXGRS0	4,940	$50.15	$ 247,741.00			
97	CLTNFLXARS0	9,675	$50.95	$ 492,941.25			
98	SNDSFLXARS0	2,051	$51.82	$ 106,282.82			
99	TLCHFLXARS0	4,073	$52.12	$ 212,284.76			
100	LBLLFLXADS0	9,782	$52.34	$ 511,989.88			
101	BSHNFLXADS0	12,635	$53.30	$ 673,445.50			
102	OCNFFLXARS0	6,101	$53.70	$ 327,623.70			
103	LKPCFLXARS0	13,872	$53.80	$ 746,313.60			
104	MRHNFLXARS0	3,074	$54.51	$ 167,563.74			
105	BWLGFLXARS0	1,701	$54.58	$ 92,840.58			
106	ALVAFLXARS1	1,778	$54.98	$ 97,754.44			
107	IMKLFLXARS0	7,045	$56.18	$ 395,788.10			
108	ASTRFLXARSO	1,578	$56.94	$ 89,851.32			
109	WLSTFLXARS0	6,776	$57.18	$ 387,451.68			
110	GNWDFLXARS0	915	$58.50	$ 53,527.50			
111	PANCFLXARS0	1,162	$61.25	$ 71,172.50			
112	BNFYFLXARS0	5,210	$65.61	$ 341,828.10			
113	SSPRFLXARS0	1,727	$66.04	$ 114,051.08			
114	MNTIFLXADS0	7,331	$74.90	$ 549,091.90			
115	FRPTFLXARS0	3,235	$75.84	$ 245,342.40			
116	CTDLFLXARS0	1,436	$78.48	$ 112,697.28		80%	$ 58.16
117	LWTYFLXARS0	1,247	$79.73	$ 99,423.31	$72.70	120%	$ 87.23
118	ALFRFLXARS0	1,743	$83.19	$ 145,000.17			
119	BAKRFLXADS0	2,841	$91.20	$ 259,099.20			
120	GDRGFLXADS0	2,387	$91.62	$ 218,696.94			
121	MALNFLXARS0	1,390	$94.37	$ 131,174.30			
122	CHLKFLXARS0	1,447	$95.26	$ 137,841.22			
123	ZLSPFLXARS0	2,646	$96.71	$ 255,894.66		80%	$ 76.12
124	PNLNFLXARS0	1,311	$102.85	$ 134,836.35	$95.15	120%	$ 114.19
125	STMKFLXARS0	773	$103.44	$ 79,959.12			
126	LEEFLXARS0	1,238	$118.06	$ 146,158.28			
127	SPCPFLXARS0	1,164	$125.04	$ 145,546.56			
128	GLDLFLXARS0	863	$129.72	$ 111,948.36			
129	EVRGFLXARS1	1,752	$131.90	$ 231,088.80		80%	$ 104.86
130	GNVLFLXARS0	1,509	$133.12	$ 200,878.08	$131.07	120%	$ 157.28
131	RYHLFLXARS0	1,602	$136.66	$ 218,929.32			
132	WSTVFLXARS0	899	$138.93	$ 124,898.07			
133	KGLKFLXARS0	339	$142.03	$ 48,148.17			
134	KNVLFLXARS0	744	$263.09	$ 195,738.96	$263.09		
135							
136							
137	Total	2,191,866	$ 26.20	$ 57,420,107			
138							

A.1.1 2-Wire Analog Voice Grade Loop - Service Level 1

	H	I	J
1			
139	**7**	**8**	**9**
140	$ 95.15	$ 131.07	$ 263.09
141	7	8	1
142	12,795	9,366	744
143			
144	3.6323	5.0032	10.0428

2-Wire Analog Voice Grade Loop - Service Level 1

	A	B	C	D	E	F	G
1	Wire Center	Total Number of Loops	Monthly Cost per Line (TELRIC)	Total Monthly Cost (TELRIC)			
139	Zone	1	2	3	4	5	6
140	Average Monthly Cost per Line (TELRIC)	$ 10.82	$ 17.63	$ 24.68	$ 33.61	$ 49.81	$ 72.70
141	Number of Wirecenters	4	28	29	20	28	8
142	Total Number of Loops	111,921	817,425	749,058	265,211	202,255	23,091
143							
144	2-Wire Analog Ratio's	0.41	0.67	0.9422	1.2831	1.9015	2.7750
145							
146							
147							
148	New Zone (Old Zones)	1 = 1	2 = 2	3 = 3	4 = (4+5+6+7+8+9)		
149	Average Monthly Cost per Line (TELRIC)	$ 10.82	$ 17.63	$ 24.68	$ 45.40		
150	Number of Wirecenters	4	28	29	72		
151	Total Number of Loops	111,921	817,425	749,058	513,462		
152							
153	2-Wire Analog Ratio's	0.4129	0.6730	0.9422	1.7329		
154							
155	New Zone (Old Zones)	1 = (1+2)	2 = 3	3 = 4	4 = (5+6+7+8+9)		
156	Average Monthly Cost per Line (TELRIC)	$ 16.81	$ 24.68	$ 33.61	$ 57.98		
157	Number of Wirecenters	32	29	20	52		
158	Total Number of Loops	929,346	749,058	265,211	248,251		
159							
160	2-Wire Analog Ratio's	0.6417	0.9422	1.2831	2.2133		

DOCKET NO. 990649B-TP
DATE: October 2, 2002

APPENDIX B - WIRE CENTERS BY ZONE				
CLLI Code	Wire Center Name	Sprint Proposed	Staff Recommended	CURRENT ZONE
ALSPFLXADS0	Altamonte Springs	1	1	2
BCGRFLXARS1	Boca Grande	1	1	1
BNSPFLXADS1	Bonita Springs	1	1	2
CPCRFLXADS0	Cape Coral	1	1	2
CSLBFLXADS1	Casselberry	1	1	2
CYLKFLXBRS0	Cypress Lake-Regional Airport	1	1	2
DESTFLXADS0	Destin	1	1	1
FTMBFLXARS0	Fort Myers Beach	1	1	1
FTMYFLXADS0	Fort Myers	1	1	1
FTMYFLXCDS2	Fort Myers	1	1	1
FTWBFLXADS0	Fort Walton Beach-Hollywood	1	1	2
FTWBFLXBDS0	Fort Walton Beach-Denton	1	1	2
FTWBFLXCRS0	Fort Walton Beach-Mary Esther	1	1	2
GLRDFLXADS0	Goldenrod	1	1	2
KSSMFLXDRS0	Buenaventura Lakes	1	1	2
LDLKFLXARS0	Lady Lake	1	1	3
LKBRFLXADS1	Lake Brantley	1	1	1
MTLDFLXADS1	Maitland	1	1	1
NNPLFLXADS1	North Naples	1	1	1
NPLSFLXDDS0	Naples	1	1	3
OCALFLXCRS0	Highlands	1	1	3
ORCYFLXADS0	Orange City	1	1	2
SHLMFLXADS0	Shalimar	1	1	2
TLHSFLXADS0	Tallahassee-Calhoun	1	1	1
TLHSFLXBDS0	Tallahassee-Willis	1	1	2
TLHSFLXDDS0	Tallahassee- Blairstone	1	1	3
TLHSFLXERS0	Tallahassee-FSU	1	1	1
VLPRFLXADS0	Valparaiso	1	1	4
VLPRFLXBRS0	Valparaiso-Seminole	1	1	4
WNDRFLXARS0	Windermere	1	1	3
WNGRFLXADS0	Winter Garden	1	1	3
WNPKFLXADS1	Winter Park	1	1	1
APPKFLXADS1	Apopka	1	2	3
CLMTFLXADS0	Clermont	1	2	4
CPCRFLXBDS1	North Cape Coral	1	2	3
KSSMFLXADS0	Kissimmee	1	2	2
KSSMFLXBDS1	Reedy Creek	1	2	2
LSBGFLXADS0	Leesburg	1	2	3
MOISFLXADS1	Marco Island	1	2	2

DOCKET NO. 990649B-TP
DATE: October 2, 2002

APPENDIX B - WIRE CENTERS BY ZONE				
CLLI Code	Wire Center Name	Sprint Proposed	Staff Recommended	CURRENT ZONE
NFMYFLXADS0	North Fort Myers	1	2	3
NPLSFLXCDS0	Naples	1	2	3
OCALFLXADS0	Ocala	1	2	2
ORCYFLXCRS0	Orange City	1	2	2
TLHSFLXCDS0	Tallahassee-Mabry	1	2	3
TLHSFLXHDS0	Tallahassee-Perkins	1	2	3
BLVWFLXADS0	Belleview	2	2	5
BVHLFLXADS0	Beverly Hills	2	2	4
CHSWFLXARS0	Chassahowitzka-Homosassa Spr.	2	2	5
CRVWFLXADS0	Crestview	2	2	4
CYLKFLXADS0	Cypress Lake	2	2	2
FTMYFLXBRS0	Fort Myers	2	2	4
GLGCFLXADS0	Golden Gate	2	2	3
KSSMFLXCRS1	Kissimmee	2	2	2
MTDRFLXARS0	Mount Dora	2	2	4
NFMYFLXBRS0	North Fort Myers	2	2	2
OCALFLXBDS0	Ocala	2	2	3
PTCTFLXADS0	Port Charlotte	2	2	3
SNISFLXADS0	Sanibel-Captiva Islands	2	2	2
SVSSFLXARS0	Silver Springs Shores	2	2	4
TLHSFLXFDS0	Tallahassee-Thomasville	2	2	4
TVRSFLXADS0	Tavares	2	2	3
AVPKFLXADS0	Avon Park	2	3	4
CPHZFLXADS0	Cape Haze	2	3	4
CRRVFLXADS0	Crystal River	2	3	4
DDCYFLXADS1	Dade City	2	3	4
ESTSFLXARS0	Eustis	2	3	3
FTMDFLXARS0	Fort Meade	2	3	5
HMSPFLXARS0	Homosassa Springs	2	3	4
HOWYFLXARS0	Howey-in-the-Hills	2	3	5
INVRFLXADS1	Inverness	2	3	4
LHACFLXADS0	Lehigh Acres	2	3	4
LKHLFLXARS0	Lake Helen-Orange City	2	3	4
MRNNFLXADS0	Marianna	2	3	5
MTVRFLXARS0	Montverde	2	3	4
PNGRFLXADS1	Punta Gorda	2	3	4
PNISFLXADS0	Pine Island	2	3	4
SBNGFLXADS1	Sebring	2	3	3
SGBHFLXARS0	Seagrove Beach	2	3	4

APPENDIX B - WIRE CENTERS BY ZONE				
CLLI Code	Wire Center Name	Sprint Proposed	Staff Recommended	CURRENT ZONE
SNRSFLXARS0	Santa Rosa Beach	2	3	5
STCDFLXARS0	St. Cloud	2	3	4
SVSPFLXARS0	Silver Springs-Ocala	2	3	4
GVLDFLXARS0	Groveland	2	4	5
SNANFLXARS0	San Antonio	2	4	5
STRKFLXADS0	Starke	2	4	5
WCHLFLXADS0	Wauchula	2	4	5
ALFRFLXARS0	Alford	3	4	6
ALVAFLXARS1	Alva	3	4	5
ARCDFLXADS0	Arcadia	3	4	5
ASTRFLXARS0	Astor	3	4	5
BAKRFLXADS0	Baker	3	4	6
BNFYFLXARS0	Bonifay	3	4	6
BSHNFLXADS0	Bushnell	3	4	5
BWLGFLXARS0	Bowling Green	3	4	5
CFVLFLXADS0	Crawfordville	3	4	5
CHLKFLXARS0	Cherry Lake	3	4	6
CLTNFLXARS0	Clewiston	3	4	4
CTDLFLXARS0	Cottondale	3	4	6
DFSPFLXADS0	DeFuniak Springs	3	4	6
EVRGFLXARS1	Everglades	3	4	5
FRPTFLXARS0	Freeport	3	4	6
GDRGFLXADS0	Grand Ridge	3	4	6
GLDLFLXARS0	Glendale	3	4	6
GNVLFLXARS0	Greenville	3	4	6
GNWDFLXARS0	Greenwood	3	4	6
IMKLFLXARS0	Immokalee	3	4	5
KGLKFLXARS0	Kingsley Lake	3	4	6
KNVLFLXARS0	Kenansville	3	4	6
LBLLFLXADS0	LaBelle	3	4	5
LEE FLXARS0	Lee	3	4	6
LKPCFLXARS0	Lake Placid	3	4	5
LWTYFLXARS0	Lawtey	3	4	6
MALNFLXARS0	Malone	3	4	6
MDSNFLXADS0	Madison	3	4	4
MNTIFLXADS0	Monticello	3	4	6
MRHNFLXARS0	Moore Haven	3	4	5
OCNFFLXARS0	Forest	3	4	5
OKCBFLXADS1	Okeechobee	3	4	5

DOCKET NO. 990649B-TP
DATE: October 2, 2002

APPENDIX B - WIRE CENTERS BY ZONE				
CLLI Code	Wire Center Name	Sprint Proposed	Staff Recommended	CURRENT ZONE
OKLWFLXADS0	Ocklawaha	3	4	4
PANCFLXARS0	Panacea	3	4	6
PNLNFLXARS0	Ponce de Leon	3	4	6
RYHLFLXARS0	Reynolds Hill	3	4	6
SLHLFLXARS0	Spring Lake	3	4	5
SNDSFLXARS0	Sneads	3	4	6
SPCPFLXARL0	Sopchoppy	3	4	6
SSPRFLXARS0	Salt Springs	3	4	6
STMKFLXARS0	St. Marks	3	4	6
TLCHFLXARS0	Trilacoochee	3	4	5
TLHSFLXGRS0	Tallahassee-Woodville	3	4	5
UMTLFLXARS0	Umatilla	3	4	6
WLSTFLXARS0	Williston	3	4	6
WLWDFLXARS0	Wildwood	3	4	5
WSTVFLXARS0	Westville	3	4	3
ZLSPFLXARS0	Zolfo Springs	3	4	6

Comparison of Rates in Sprint's Tariff and Recommendation

	Tariff Rate Zones	Tariff Rate	REC Rate Zones	REC Rate
Analog 2-Wire Voice Grade Loop (w/o NID)	1	$10.78	1	$16.81
	2	$15.41	2	$24.69
	3	$20.54	3	$33.62
	4	$27.09	4	$57.99
	5	$39.66		
	6	$74.05		
Analog 4-Wire Voice Grade Loop (w/o NID)	1	$18.80	1	$32.42
	2	$26.88	2	$47.60
	3	$35.85	3	$64.82
	4	$47.24	4	$111.82
	5	$69.17		
	6	$129.13		
Digital 2-Wire ISDN-BRI Capable Loop	1	$11.65	1	$29.68
	2	$16.65	2	$43.59
	3	$22.20	3	$59.36
	4	$29.26	4	$102.39
	5	$42.84		
	6	$79.98		
CCF Package		$0.23		$0.33
CLASS Package		$4.74		$5.07
CENTREX Package		$10.47		$10.15
3 Way Conference/Hold/Transfer		$1.80		$1.63
Conference Call 6 Way		$2.35		$2.32
Dial Transfer to Tandem Tie Line		$0.12		$0.12
Direct Connect		$0.03		$0.02
Meet Me Conference		$17.03		$15.61
Multi Hunt Service		$0.08		$0.10
911 Per DSO Equivalent		$15.81		Dedicated Transport Price
NID 2 line 2-wire		$0.95		$0.82
NID 2 line 4-wire		$0.95		No Rate Listed
Common Transport (per MOU)		$0.000711		$0.000814
Dedicated Transport (DS1; DS3)	Numerous Rates (Rates are on a route-specific basis, the general trend for DS1 transport is significant increases, while for DS3 transport there appears to be both significant increases and decreases.)			

Mulitplex (DS1 to VG)	$300.00	$162.48
Multiplex (DS3 to DS1)	$600.00	$195.77
Service Order (NRC)	$25.15	$28.10 Manual $3.82 Electronic
Trip Charge (NRC)	$18.41	$18.88
NID Installation (NRC)	$37.36	$8.50
Additional Loop Connection (NRC)	$18.68	$52.73 2-Wire $85.82 4-Wire
Loop Rework 2-Wire (NRC)	$37.38	$65.81
Loop Rework 4-Wire (NRC)	$62.41	$81.70
Testing (NRC)	$1.42	$46.71 2-Wire $66.99 4-Wire
Trouble Isolation and Testing (NRC)	$66.58	$48.47

Note: The rate zones in the tariff and the rate zones in the recommendation do not match.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
ISSUE 1: What factors should the Commission consider in establishing rates and charges for UNEs (including deaveraged UNEs and UNE combinations)?	UNE rates should be set using the standards authorized by Section 252(d)(1) of the Act . . .	UNE rates should be set using the standards authorized by Section 252(d)(1) of the Act . . .	The same recommendation was made for both companies.
ISSUE 2(a): What is the appropriate methodology to deaverage UNEs and what is the appropriate rate structure for deaveraged UNEs?	The ALEC Coalition's three zone deaveraging proposal modified as necessary . . .	Staff recommends the four zone deaveraging proposal discussed in staff's analysis, modified as necessary . . .	The Commission voted to approve 3 zones for Verizon. Staff is recommending 4 zones for Sprint.
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.	The recurring costs of all varieties of loops and subloops below DS3, and combinations containing such loops, should be deaveraged.	The recurring costs of all varieties of loops and subloops below DS3, and combinations containing such loops, should be deaveraged.	The same recommendation was made for both companies.
ISSUE 3(a): What are xDSL capable loops? ISSUE 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?	xDSL-capable loops are all copper loops that do not contain any impediments such as repeaters, load coils, or excessive bridged tap. Moreover, while it may be reasonable for loop prices to vary . . .	xDSL-capable loops are all copper loops that do not contain any impediments such as repeaters, load coils, or excessive bridged tap. Moreover, while it may be reasonable for loop prices to vary . . .	The same recommendation was made for both companies.
ISSUE 4(a): Which subloop elements, if any, should be unbundled in this proceeding, and how should prices be set?	Verizon should unbundle: Intra-building House Cable; Intra-building Riser Cable; 2-wire Feeder; . . . The prices proposed by Verizon should be modified to reflect staff's recommended changes in all other applicable issues.	Staff recommends that Sprint unbundle feeder and distribution subloop elements. Sprint should also provide any other technically feasible subloop elements requested by ALECs on an individual case basis.	Staff's recommendations for unbundling subloops are consistent based on each company's proposal. Sprint has proposed rates for the subloops identified in its proposal; however, for any additional subloop elements requested, the rates will be based on ICB pricing. To date Sprint has not received a request to unbundle its subloops. Although no party filed testimony opposing Sprint's proposal, staff reviewed the record (including discovery responses & deposition transcripts) and concluded that Sprint's proposal is reasonable.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
ISSUE 4(b): How should access to such subloop elements be provided, and how should prices be set?	Verizon should be required to provide access to subloop elements at any technically feasible point . . . prices for access to subloops should be on an individual case basis . . .	Sprint should be required to provide access to subloop elements at any technically feasible point . . . . prices for access to subloop elements should be on an individual case basis.	The same recommendation was made for both companies.
ISSUE 5: For which signaling networks and call-related databases should rates be set?	Verizon's proposal should be accepted.	The parties agree with Sprint's position on this issue.	The parties in the Sprint proceeding stipulate to Sprint's position.
ISSUE 6: Under what circumstances, if any, is it appropriate to recover non-recurring costs through recurring rates?	. . . The inclusion of non-recurring costs in recurring rates may be considered where the resulting level of nonrecurring charges would constitute a barrier to entry.	. . . The inclusion of non-recurring costs in recurring rates should be considered where the resulting level of nonrecurring charges would constitute a barrier to entry.	The recommendations are consistent for both companies.
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)	The network design reflected in ICM-FL should be accepted.	The network design reflected in the SLCM should be accepted.	The same recommendation was made for both companies based on their individual models.
(b) depreciation;	The appropriate projection lives and net salvage values are those the Commission approved for BellSouth.	The appropriate lives and net salvage values are those proposed by Sprint (i.e., the Commission approved BellSouth lives and values).	The recommended depreciation lives and salvage values are identical for both companies.
(c) cost of capital;	The appropriate forward-looking cost of capital is 9.63% based on a cost rate for common equity of 11.24%, a debt cost rate of 7.22%, and a capital structure consisting of 60% equity and 40% debt.	The appropriate cost of capital is 9.86% based on a cost rate for common equity of 11.49%, a debt cost rate of 7.43%, and a capital structure consisting of 60% equity and 40% debt.	Staff recommended adopting the position of staff witness Draper for both Verizon & Sprint.
(d) tax rates;	The Florida-specific tax rates should be . . .	The Florida-specific tax rates should be . . .	The same recommendation was made for both companies.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
(e) structure sharing;	The appropriate assumptions and inputs for structure sharing should be those proposed by Verizon.	The appropriate assumptions and inputs for structure sharing should be those proposed by Sprint.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party filed testimony opposing Sprint's assumptions and inputs for structure sharing, staff reviewed the record (including discovery responses & deposition transcripts) and concluded that Sprint's proposed values are reasonable.
(f) structure costs;	The assumptions and inputs for structure costs proposed by Verizon are appropriate.	The assumptions and inputs for structure costs proposed by Sprint are appropriate.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party filed testimony opposing Sprint's assumptions and inputs for structure costs, staff reviewed the record (including discovery responses) and concluded that Sprint's proposed values are reasonable.
(g) fill factors;	Staff recommends accepting Verizon's proposed feeder and distribution cable sizing factors and any other fill factors addressed in this issue, with one exception. Consistent with what was ordered for BellSouth, staff recommends that the administrative fill be set at 1.0, since there is an adequate allowance for growth in the cable sizing factors.	The appropriate assumptions and inputs for fill factors in the forward-looking UNE cost studies should be those fills filed by Sprint.	On balance the recommendations are comparable based on each company's individual proposal. Although no party filed testimony opposing Sprint's assumptions and inputs for fill factors, staff reviewed the record (including discovery responses & deposition transcripts) and concluded that Sprint's proposed values are reasonable.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
(h) manholes;	The assumptions and inputs for manholes proposed by Verizon are appropriate.	The assumptions and inputs for manholes proposed by Sprint are appropriate.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's assumptions and inputs for manholes, staff reviewed the record and concluded that Sprint's proposed values are reasonable.
(i) fiber cable (material and placement costs); (j) copper cable (material and placement costs);	The appropriate assumptions and inputs for fiber and copper cable material and placement costs are those identified by Verizon, as modified by staff's recommendation in Issue 7(s).	The appropriate assumptions and inputs for fiber and copper cable material and placement costs are those proposed by Sprint.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party filed testimony opposing Sprint's assumptions and inputs for fiber and copper cable material & placement costs, staff reviewed the record (including discovery responses & deposition transcripts) and concluded that Sprint's proposed values are reasonable.
(k) drops;	The appropriate assumptions and inputs for drops should be those contained in Verizon witness Tucek's testimony and the accompanying cost study.	The appropriate assumptions and inputs are those proposed by Sprint.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party filed testimony opposing Sprint's assumptions and inputs for drops, staff reviewed the record (including Sprint's confidential workpapers) and concluded that Sprint's proposed values are reasonable.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
(l) network interface devices;	The appropriate assumptions and inputs for NIDs should be the input values and assumptions contained in Verizon's cost study and study documentation.	The appropriate assumptions and inputs to be used in the forward-looking recurring UNE cost studies for NIDs are those proposed by Sprint.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party filed testimony opposing Sprint's assumptions and inputs for NIDs, staff reviewed the record (including deposition transcripts) and concluded that Sprint's proposed values are reasonable.
(m) digital loop carrier costs;	The appropriate assumptions and inputs for DLC costs should be the input values and assumptions contained in Verizon witness Tucek's testimony and the Verizon cost study; however, when calculating the rate for UNE-P, Verizon should assume an integrated DLC configuration.	The appropriate assumptions and inputs for digital loop carrier costs are those proposed by Sprint.	Sprint accounted for the use of IDLC when provisioning a loop/port combination, as was recommended by staff in the Verizon proceeding; therefore, staff's recommendation for Sprint is consistent with the Commission's vote on Verizon.
(n) terminal costs;	The assumptions and inputs for terminal costs proposed by Verizon are appropriate.	The assumptions and inputs for terminal costs proposed by Sprint are appropriate.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's assumptions and inputs for terminal costs, staff reviewed the record (including deposition transcripts) and concluded that Sprint's proposed values are reasonable.
(o) switching costs and associated variables;	The appropriate assumptions and inputs for switching costs and associated variables are those proposed by Verizon.	The appropriate assumptions and inputs for switching costs and associated variables are those proposed by Sprint.	While the companies use different switches, staff's recommendations are consistent in that each company is modeling a forward-looking switch appropriate to that company.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
(p) traffic data;	The assumptions and inputs used by Verizon in their cost study for traffic data should be adopted.	The appropriate assumptions and inputs are those recommended by Sprint.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint. Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's assumptions and inputs for traffic data, staff reviewed the record (including discovery responses) and concluded that Sprint's proposed values are reasonable.
(q) signaling system costs;	Verizon's proposed SS7 rates and rate structure should be accepted.	Sprint's proposed SS7 rates and rate structure should be accepted.	This issue was not contested in either proceeding. Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's rates for SS7, staff reviewed the record and concluded that Sprint's proposed values are reasonable.
(r) transport system costs and associated variables;	The appropriate assumptions and inputs for transport system costs and associated variables are those included in the cost studies filed by Verizon, with those modifications set forth in staff recommendation.	Sprint's assumptions and inputs for transport system costs and associated variables should be accepted.	Staff recommended adjustments to Verizon's company-specific inputs because it appeared that their study had an error. No adjustments were recommended to the Sprint inputs because no errors were identified. In addition, staff reviewed the record (including discovery responses and deposition transcripts) and concluded that Sprint's proposed values are reasonable. No party other than Sprint took a position on this issue.
(s) loadings;	The appropriate assumptions and inputs for the loadings factors are those identified by Verizon.	Sprint's loading factors should be accepted.	Sprint does not use linear loadings. Staff's recommendation for Sprint is consistent with the Commission's decision for BellSouth.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
(t) expenses;	Verizon's tops-down modeling technique to estimate forward-looking expenses is reasonable. The use of C.A. Turner indices is appropriate to establish the historical relationship between expenses and investment. However, staff believes that use of ICM's calibration function yields expense-to-investment ratios calculated on an inconsistent basis. Accordingly, staff recommends for purposes of establishing Verizon's UNE rates in this proceeding, expense-to-investment factors should be derived with the calibration function disabled.	Staff recommends that Sprint-Florida's expense inputs be accepted for purposes of this proceeding.	The approach employed by Sprint differs from that used by Verizon (though it is similar to that used by BellSouth). Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's expense values, staff reviewed the record (including deposition transcripts) and concluded that Sprint's proposed values are reasonable.
(u) common costs;	The basic concept underpinning Verizon's calculation of the common cost factor based on expenses, not revenues, should be accepted. Verizon should consistently apply its common cost methodology in calculating deaveraged rates, such that each zone is allocated a common cost percentage, not a fixed amount. Verizon should be permitted to recover external relations and legal costs through its common cost factor.	Staff recommends that Sprint-Florida's expense inputs be accepted for purposes of this proceeding.	Each company calculated common costs differently. Sprint's common costs are slightly less than that approved for Verizon. Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's expense inputs, staff reviewed the record and concluded that Sprint's proposed values are reasonable.
(v) other.	All matters raised by the parties have been addressed in other issues. Accordingly, no action is needed with regard to this issue.	All matters raised by the parties have been addressed in other issues. Accordingly, no action is needed with regard to this issue.	The same recommendation was made for both companies.
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; (b) OSS design; (e) mix of manual versus electronic activities;	The appropriate assumptions and inputs for determining network design, OSS design, and the mix of manual versus electronic activities, are those proposed by staff in Issue 8(d).	The appropriate assumptions and inputs for determining network design, OSS design, and the mix of manual versus electronic activities, are those set forth by Sprint.	No specific adjustments were recommended in this issue for either company.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
(c) labor rates;	The appropriate assumptions and inputs for labor rates should be those proposed by Verizon.	The appropriate assumptions and inputs for labor rates should be those proposed by Sprint.	Staff recommended adopting company-specific inputs; the specific inputs differed between Verizon and Sprint.
(d) required activities;	Staff recommends reducing Verizon's minutes per order for the various NRC elements as described in the staff analysis. Verizon should also separately state its NRC disconnect charges consistent with Order No. PSC-98-0604-FOF-TP, issued April 29, 1998 and Order No. PSC-01-1181-FOF-TP, issued May 25, 2001.	The appropriate assumptions and inputs for the required activities included in Sprint's Non-Recurring Cost(NRC) study are those recommended by Sprint.	Staff recommended several adjustments to Verizon's required activities. However, no adjustments were recommended for Sprint because staff believes Sprint's NRCs are reasonable. Staff compared Sprint's NRCs to those of BellSouth as a gauge of reasonableness.
(f) other.	All matters raised by the parties have been addressed in other issues.	All matters raised by the parties have been addressed in other issues.	The same recommendation was made for both companies.
ISSUE 9(a): What are the appropriate recurring rates (averaged or deaveraged as the case may be) and non-recurring charges for the UNEs listed on page 309 of the recommendation?	Recurring rates are contained in Appendix A-1 and staff's recommended non-recurring rates are contained in Appendix B-1.	Staff's recommended recurring and non-recurring rates are contained in Appendix A.	The same recommendation was made for both companies. This is a fall-out issue.
ISSUE 9(b): Subject to the standards of the FCC's Third Report and Order, should the Commission require ILECs to unbundle any other elements or combinations of elements? If so, what are they and how should they be priced?	There are no other elements or combinations of elements that the Commission should require ILECs to unbundle at this time.	No, there are no other elements or combinations of elements that the Commission should require ILECs to unbundle at this time.	The same recommendation was made for both companies.

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
ISSUE 10: What is the appropriate rate, if any, for customized routing?	Rates for customized routing should be determined on an individual case basis (ICB).	Staff believes that the customized routing rates proposed by Sprint are appropriate.	Because the records for this issue varied, staff recommended that Sprint's proposed rates for customized routing be accepted while Verizon's customized routing rates be established on an ICB. Although no party other than Sprint took a position on this issue and no party filed testimony opposing Sprint's rates for customized routing, staff reviewed the record (including deposition transcripts) and concluded that Sprint's proposed values are reasonable.
ISSUE 11(a): What is the appropriate rate if any, for line conditioning, and in what situations should the rate apply?	The rate for load coil removal on loops under 18 kft should be zero. All other conditioning rates should be those contained in the Verizon/Covad agreement.	The appropriate rates for line conditioning are those recommended by staff.	Staff recommendation for load coil removal on loops under 18kft is identical. However, for loops over 18kft staff recommended that the Sprint proposed rates be approved, and in the Verizon case, staff recommended the rates from the Verizon/Covad arbitration be approved. (Verizon's proposed rates were many times greater than the BellSouth-approved rates.)

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

00325

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
ISSUE 11(b): What is the appropriate rate, if any, for loop qualification information, and in what situations should the rate apply?	The appropriate rate for Verizon's mechanized loop qualification is $0.51. This rate should apply as an additive on each ALEC xDSL loop order and each ALEC line sharing order. . . .	The Commission should require Sprint to implement an electronic loop qualification offering. Because the record lacks information on how significant an undertaking this may be, staff suggests that Sprint be required to report within 60 days of the order in this docket becoming final, when and how it will have an electronic loop qualification offering in place. Until an electronic interface is in place, those ALECs that require loop qualification information should not be subject to a manual loop make-up charge of $37.55; rather, the ALECs should be charged an interim rate of $5.90. . . .	Unlike Verizon, staff believes that Sprint fails to comply with portions of the FCC's UNE Remand order. Specifically, staff believes that Sprint does not offer comparable access to its loop qualification information. As such, staff is recommending an interim rate for Sprint and development of an electronic system for CLECs.
ISSUE 12(a): 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" . . . ;	The appropriate recurring rates for UNE-P will equal the sum of the monthly recurring charges for the individual UNEs that are required to create the platform, less $1.39 to account for the cost saving from using IDLC technology.	The appropriate recurring and nonrecurring rates for UNE combinations are those recommended by staff.	Issue 12(a) and (b) are addressed together in the Sprint recommendation. Staff's recommendations for Verizon and Sprint are consistent. With regard to UNE-P Sprint considers IDLC technology when calculating its proposed rates; as such, this is consistent with the staff recommendation for Verizon's UNE-P rate calculation. Staff's recommendation for EEL combinations is identical for both companies.
ISSUE 12(b): Without deciding the situations in which such combinations are required, what are the appropriate recurring and non-recurring rates for the following UNE combinations: (b) "extended links," consisting of . . .	The appropriate recurring and non-recurring rates for EELS are those recommended by staff.	The appropriate recurring and nonrecurring rates for UNE combinations are those recommended by staff.	See notes for Issue 12 (a).

COMPARISON OF COMMISSION APPROVED RECOMMENDATIONS FOR VERIZON VERSUS STAFF RECOMMENDATIONS FOR SPRINT

(The issues which are shaded appear to be most controversial in the Sprint proceeding.)

Issue	Summary of Commission Approved Recommendations for Verizon	Summary of Staff Recommendations for Sprint	Notes
ISSUE 13: When should the recurring and non-recurring rates and charges take effect?	The recurring and non-recurring rates and charges should take effect when existing interconnection agreements are amended . . . For new agreements, the rates shall become effective when approved by the Commission. Pursuant to Section 252(e)(4) of the Act, a negotiated agreement is deemed approved by operation of law after 90 days from the date of submission to the Commission.	The recurring and non-recurring rates and charges should take effect when existing interconnection agreements are amended . . . For new agreements, the rates shall become effective when approved by the Commission. Pursuant to Section 252(e)(4) of the Act, a negotiated agreement is deemed approved by operation of law after 90 days from the date of submission to the Commission.	The same recommendation was made for both companies and is consistent with this Commission's decision in the BellSouth proceeding.

File: I\990649b\issuecomparisontable.wpd