

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into ) DOCKET NO. 930330-TP  
IntraLATA Presubscription ) ORDER NO. PSC-96-0692-FOF-TP  
\_\_\_\_\_ ) ISSUED: May 23, 1996

The following Commissioners participated in the disposition of this matter:

SUSAN F. CLARK, Chairman  
J. TERRY DEASON  
JOE GARCIA  
JULIA L. JOHNSON  
DIANE K. KIESLING

ORDER GRANTING PETITION AND APPROVING TARIFFS

BY THE COMMISSION:

I. Case Background

On February 13, 1995, we issued Order No. PSC-95-0203-FOF-TP, finding intraLATA presubscription (ILP) in Florida is in the public interest and directing the four large local exchange companies (LECs) to implement ILP by the end of 1997. We also ordered the LECs to file tariffs by July 1, 1995, instituting a rate element to allow the recovery of implementation costs of ILP. While BellSouth Telecommunications, Inc., (BellSouth or BST) and GTE Florida, Inc., (GTEFL) filed cost recovery tariffs on June 30, 1995, United Telephone Company of Florida (United) and Central Telephone Company of Florida (Centel) both requested a waiver from that portion of the order requiring a cost recovery rate element. On July 18, 1995, MCI Telecommunications, Inc., (MCI) filed objections to SBT's and GTEFL's cost recovery tariffs. GTEFL and SBT filed responses to MCI's opposition of their cost recovery tariffs on July 25, and July 31, 1995, respectively. Subsequently, MCI withdrew its objections on April 17, 1996.

On July 19, 1995, GTEFL filed a Motion to Reopen the Record in this docket. GTEFL asserted that certain information concerning the impact of ILP on AT&T Communications of the Southern States, Inc., (ATT-C) was available at the time of hearings but was not produced. While SBT filed a motion in support of GTEFL's motion to reopen the record, Florida Interexchange Carriers Association (FIXCA), MCI and ATT-C filed responses in opposition.

On September 1, 1995, GTEFL filed a Notice of Appeal and Motion for Stay of Orders Nos. PSC-95-0203-FOF-TP and PSC-95-0918-FOF-TP with the Supreme Court. The Court granted the Motion for Stay on October 10, 1995. GTEFL filed a Notice of Voluntary Dismissal of its appeal on February 20, 1996. BellSouth filed a motion with the Supreme Court on February 20, 1996, to continue the

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stay. The Court denied the motion on March 11, 1996. BellSouth withdrew its appeal of the Orders on April 12, 1996.

During the period of time the Stay was in place, the four large LECs continued to modify their administrative systems and to test software for presubscription capability. However, the companies asserted that they would defer the functional implementation of presubscription as long as the stay remained in effect. Although the original implementation schedules submitted by the four large LECs have been revised due to this delay, the schedules are still in compliance with Order No. PSC-95-0203-FOF-TP, issued February 13, 1995. In that Order, we stated that the four large LECs shall be allowed to modify switches for intraLATA presubscription consistent with their current planned upgrade projects and shall implement intraLATA presubscription throughout their respective service areas by December 31, 1997. Based on the most current available schedules, GTEFL, Centel and United plan to complete the implementation of intraLATA presubscription by February 1997, while SBT plans to complete its implementation by November 1997.

Our decision to grant United/Centel's Petition for a waiver of portions of Order No. PSC-95-0203-FOF-TP and approve BST's and GTEFL's tariffs is set forth below.

II. United/Centel's Petition for Waiver of Portions of Order No. PSC-95-0203-FOF-TP

On June 30, 1995, United Telephone Company of Florida and Central Telephone Company of Florida (United/Centel or Companies) filed a petition for waiver of certain portions of Order No. PSC-95-0203-FOF-TP issued in this docket on February 13, 1995. Specifically, the Companies requested a waiver of both the requirement to file a tariff which provides for ILP cost recovery by July 2, 1995, and the requirement to file quarterly reports on the ILP cost recovery.

United/Centel state that they prefer not to establish the new cost recovery rate element. The Companies believe that an additional rate element would increase access charges at a time when they are committed to reducing their intrastate switched access price levels and simplifying their price structure. United and Centel argue that they continue to receive pressure from their largest customers to reduce access charges. The Companies believe that an increase in access charges at this time would send an inappropriate price signal to the increasingly competitive market and would negate some of the progress that they have made recently in reducing switched access prices to a more sustainable level.

For these reasons, United and Centel have requested a waiver from that portion of the Order requiring a cost recovery rate element.

In that Order, we also required the filing of quarterly monitoring reports on the cost recovery rate element. The purpose of the reports is to determine when a LEC has fully recovered its costs so that the cost recovery rate element can then be eliminated. The Companies assert that if their request for waiver regarding the cost recovery rate element is granted, there will be no need for the quarterly reporting. Thus, United and Centel request that, if the waiver of the cost recovery rate element is granted, then the requirement to provide quarterly monitoring reports also be waived.

We note that United and Centel elected price cap regulation on January 2, 1996. Although we implemented a mechanism by which the LECs can recover cost for the implementation of ILP, there is no requirement that United and Centel recover such costs. Accordingly, we shall grant United's and Centel's request for a waiver for establishing an ILP cost recovery rate element. Further, the companies shall not be required to file quarterly monitoring reports.

### III. BellSouth's Tariff Revisions

On June 30, 1995, pursuant to Order No. PSC-95-0203-FOF-TP, issued February 13, 1995, BellSouth filed a tariff to include a new rate element for intraLATA equal access cost recovery. In addition, the company proposed to introduce several new intraLATA presubscription related services and to reflect tariff language changes in its Access Services and General Subscriber Service Tariffs.

#### IntraLATA Presubscription Cost Recovery

As we stated in Order No. PSC-95-0203-FOF-TP, the ILP implementation costs shall be recovered from each IXC operating in the state, based on their originating FGD interLATA intrastate access minutes of use (MOUs). The rate element must be calculated by dividing the estimated ILP implementation costs by the historic (most recent 12 months) originating FGD interLATA access MOUs. The rate element will be applied to each IXC's originating FGD interLATA access minutes of use and billed monthly. We stated that the period for cost recovery shall be three years and ordered the LECs to file quarterly monitoring reports during this time period.

BellSouth estimates its total cost for the implementation of ILP to be \$5.9 million. This figure includes the Company's cost for software, public relations, consumer services, interconnection,

comptrollers, and information technology. To determine the present worth of the future value, the Company proposes to use present value interest factors to adjust the costs associated with each of these categories over the three-year recovery period. The proposed present value interest factors used by the Company are .940, .830, and .733 for years one through three, respectively. Below is a brief explanation of costs for each category.

1. **Software** - This category includes the right to use (RTU) fees for each of the Company's switches and their associated costs for installing and activating the feature. The estimated software costs are approximately \$3,553,378. We note that present value interest factors are not utilized in determining the Company's software costs because these components are expensed up-front.
2. **Public Relations** - This category includes the Company's administrative and advertising costs for the cost recovery period of three years. The administrative costs encompass the time involved in creative planning, development and media planning, whereas the advertising costs cover the notification of customers associated with the bill insert to be mailed to each customer account. The total costs for public relations are estimated at approximately \$1,929,364.
3. **Consumer Services** - This category includes the Company's costs for service order procedures (e.g., train service representatives, handle customer inquiries, etc.), project management, and service order Communications system application support. The estimated costs for this category are approximately \$83,497.
4. **Interconnection Equal Access Service Center (EASC)** - This category includes the Company's cost for service order procedures in the equal access service center (e.g., process and maintain IXC intraLATA subscription agreements, update systems to include participating IXCs, process orders, etc.), project management for the product/services inventory management system, and system enhancements. The Company estimates the costs for interconnection to be approximately \$238,746.
5. **Comptrollers** - This category includes service order procedures (i.e., develop method and procedures and train managers) and error processing (e.g., key manual PICs, release or delete service orders, assign error codes, prepare manual resolution report forms, investigate hold file errors, etc.). The Company estimates that the total costs for comptrollers to be approximately \$27,483.

6. **Information Technology** - This category includes service order standards, program development, application support, and CPU processing. The Company estimates the total costs for information technology to be \$120,819.

BellSouth's interLATA intrastate originating MOUs for the most recent 12 month period ending January 1996 were 3,474,564,978 minutes. Using the same present value interest factors as used in determining the Company's cost, this equates to a proposed rate of \$.000684 per originating FGD access minute over a 3-year recovery period. The Company proposes to add the cost recovery rate element to Section E13.3.3.F.1 of its Access Service Tariff.

Upon review, we find that the BellSouth's estimated implementation costs and FGD MOUs are appropriate for determining the recovery rate element for ILP.

#### Access Service Tariff and GSST Revisions

The Company proposes to revise its Access Service Tariff and General Subscriber Service tariff to reflect tariff language changes as a result of intraLATA equal access impacts. It also proposes to offer several new services associated with ILP. The Company asserts that the proposed rates for these new services mirror the current interstate rates, and that IXCs are familiar with the interLATA presubscription services and their applicable charges currently tariffed in the interstate access tariff. The new service offerings are described below:

1. **Preferred Interexchange Carrier (PIC) Change**

With the implementation of ILP, end users have the option of designating to BellSouth a particular IXC to access for intraLATA toll calls without dialing an access code. An intraLATA PIC change charge is applicable for each intraLATA PIC change submitted to the Company. The Company has proposed a nonrecurring PIC change charge of \$1.49 per line or trunk billed to the end user, the public/semi-public owner or the IXC. However, owners of public/semi-public pay telephones or end users would not incur a charge for ILP when the selection of a preferred intraLATA IXC is in connection with the establishment of telephone exchange service with the Company. In addition, the IXC may elect to pay the applicable PIC change charge for the end user or owner.

2. **Unauthorized Preferred Interexchange Carrier (UPIC) Change**

An unauthorized change in presubscription occurs when a public/semi-public owner or an end user denies requesting a change in carrier presubscription as submitted by an IXC, and the IXC is

unable to produce a letter of confirmation. The IXC will then be assessed the PIC change charge that was previously billed to the end user or public/semi-public owner.

The Company proposes to introduce the intraLATA UPIC charge. If an end user or public/semi-public owner disputes a change in carrier presubscription submitted by an IXC, the Company proposes that the IXC be assessed the intraLATA UPIC charge, as well as the applicable PIC change charge. The Company asserts that the proposed intraLATA UPIC rates mirror those in its interstate access tariff. The nonrecurring charge for an unauthorized presubscription change will be \$19.41 per line or trunk, business or residence, and \$34.19 per public or semi-public pay telephone line.

### **3. On-Line Transfer (OLT) Service**

The Company proposes to introduce On-Line Transfer service which will be available to IXCs participating in intraLATA presubscription. The purpose of this service will be to assist IXCs and customers in the establishment of a newly acquired customer's account. When an initial selection or change in preferred intraLATA carrier is requested, a Company representative will provide the end user or owner with the newly selected IXC's 800 telephone number. If the preferred IXC participates in the On-Line Transfer service, the end user or owner will have the option of being transferred directly to his or her preferred IXC. The Company proposes a nonrecurring service establishment charge of \$891.00 and a monthly recurring charge, per IXC, of \$500.00.

### **4. Expedited PIC switchback Service (EPSS)**

The Company proposes an expedited method of handling disputed intraLATA PIC changes for owners of public/semi-public telephones or end users. EPSS will be available to IXCs participating in ILP. If an end user or owner disputes an intraLATA PIC change, and the IXC participates in EPSS, the end user or owner will be returned to his or her former intraLATA carrier without the Company performing an investigation.

The customer's last intraLATA IXC will be billed an EPSS charge plus the applicable PIC change charge incurred for switching the end user or owner back to the former intraLATA carrier. The Company's proposed nonrecurring charge for expedited PIC switchback service is \$10.03 per line or trunk, business or residence and \$27.08 per public or semi-public pay telephone line.

**5. Equal Access Transaction Services (EATS)**

The Company proposes to introduce various equal access transaction services that would provide the IXCs a non-mechanized interface with the Company for specified information regarding ILP. Listed below are some of the services that would be available.

Specified Due Date for PIC Change Service - The Company would accept an order from an IXC requesting the Company to change the intraLATA PIC for an end user's business or residence line, or trunk, or owner's public/semi-public line, to the requesting IXC's carrier identification code. The Company would internally coordinate and schedule a standard due date which would be provided to the IXC requesting the change.

Customer Service Record (CSR) Information Service - The Company would provide and verify customer service record information for residence, business, and public/semi-public accounts for which the IXC has obtained proper authorization. CSR information service would provide billing name, billing address, billing telephone number, working telephone number, terminal numbers, customer type (residence/business/coin), and customer code.

Carrier Identification Code (CIC) Verification - CIC verification would be available from the Company's equal access service center through properly authorized written or fax requests submitted by the IXC. The proposed charges would be applied on a billing telephone number (BTN) and working telephone number (WTN) basis for each line verified for CIC information. The IXC can only verify BTNs and WTNs of its own customers.

Verification of Pending Service Orders that Impact PIC Orders Service - The IXC may request the status and/or verification of pending service orders that impact residence, business and/or public/semi-public intraLATA PIC orders. The IXC must provide the service order numbers or the BTNs to the Company before verification would be provided. The Company would provide an estimated due date to the carrier for the pending service order(s).

Resolution of PIC Discrepancy Service - The IXC may request resolution of residence, business, and/or public/semi-public PIC discrepancies. The proposed charge for resolution of PIC discrepancy service would apply per working telephone number.

The nonrecurring rates for the equal access transaction services are shown in Table I. With the exception of the resolution of PIC discrepancy service, the Company proposes one

rate for the BTN and an additional charge for each working telephone number associated with the BTN.

**Table I: Charges for Equal Access Transaction Services**

|   | Nonrecurring Charges |         |
|---|----------------------|---------|
|   | Per BTN              | Per WTN |
| Specified Due Date Service                                    | \$3.29               | \$0.21  |
| Customer Service Record Information Service                   | 4.06                 | .36     |
| CIC Verification  | 2.91                 | .21     |
| Verification of Pending Orders that impact PIC Orders Service | 4.53                 | .52     |
| Resolution of PIC Discrepancies                               | N/A                  | 5.87    |

**6. Data Gathering Through Customer Account Record Exchange (CARE)**

The Company asserts that data gathering through CARE service would be available to IXCs and resellers who participate in ILP. The service would assist IXCs and resellers in obtaining information that could be used to submit PIC changes for all numbers associated with a subscriber's BTN without requiring the subscriber to provide this information. For example, IXCs and resellers requesting data gathering through CARE would submit a CARE record at the BTN level and receive all the WTNs and terminal numbers associated with the BTN. The information provided would include the billing name and address, BTN, WTN, terminal numbers, customer type indicator (e.g., residence, business, etc.), non-published/non-listed indicator, and the customer identification code (CIC). The Company proposes a rate of \$.18 per WTN for this service.

**7. PIC in Error (PIE)**

BellSouth proposes to provide PIE service to IXCs participating in ILP. IXCs would be required to have a blanket agency letter for submitting PIC orders on file with the Company. This service would allow the IXCs to submit a line number, or a list of line numbers, of customers whose PIC was changed in error by the IXC. The Company would then determine the end user's prior carrier and appropriately return the end user to his or her former PIC at no charge to the end user. The Company asserts that in addition to the proposed PIE charge of \$3.29, per business/residence or public/semi-public line or trunk, the IXC submitting the erroneous PIC change would also be assessed the applicable PIC change charge.



Upon review, we find that the proposed services will provide end users the same options as they currently have in the interstate, interLATA market. Further, the rates proposed by BellSouth mirror its existing interstate rates, and are appropriate since they cover costs and will not have a negative impact on the general body of ratepayers.

In addition to the new service offerings, the Company has proposed revisions to its Access Service Tariff and GSST to reflect tariff language changes as a result of intraLATA equal access impacts. The proposed changes include deleting language that requires that the carriage and completion of all intraLATA dialed calls be provided by the Company. Due to the upcoming changes as a result of ILP, the proposed revisions are appropriate.

Based on the foregoing, BellSouth's revisions to its Access Services tariff to include a new rate element for intraLATA equal access cost recovery, to introduce several new services associated with intraLATA presubscription shall be approved. Further, the tariff language changes in its Access Services tariff and GSST as a result of intraLATA equal access shall also be approved. The tariffs shall be deemed effective May 1, 1996. BellSouth shall file its first monitoring report 30 days following the end of the quarterly period in which cost recovery was initiated. Based on an effective date of May 1, 1996, the Company shall file its first quarterly report on July 30, 1996.

#### IV. GTEFL's Tariff Revisions

On June 30, 1995, pursuant to Order No. PSC-95-0203-FOF-TP, issued February 13, 1995, GTEFL filed proposed revisions to its Access Service Tariff to recover the costs of ILP.

In anticipation of requirements to implement intraLATA presubscription in all states in the near future, GTEFL has proposed to allocate its ILP implementation costs across all states in which it operates. The Company's proposed switching expenses consist of software development, switch updates, right to use (RTU) fees, engineering, installation, and translation. The proposed system expenses include GTEFL's end user billing system, carrier billing, service order system and administrative systems. Attachment I provides a summary of GTEFL's estimated costs and the cost recovery calculation. The Company estimates its total cost for the implementation of ILP to be \$3,342,439. This figure consists of the Company's switch and system expenses allocated to Florida. The Company's cost recovery methodology is discussed below.

### **Switch Expenses**

In determining the costs of intraLATA presubscription to be recovered in Florida, GTEFL allocated its software purchase expenses based on accounting factors which GTE uses to allocate common central office expense. The 10.4% allocation factor used for determining the expenses to be assigned to Florida is based on investments that are directly assignable to the state. These investments include total central office equipment, information originating and terminating equipment, recording messages and cable and wire facilities. The Company asserts that it allocated expenses for the Northern Telecom DMS 10 and DMS 100, AGCS GTD5, and AT&T #2EAX and 5ESS using this methodology. We note that while GTEFL currently only has AGCS GTD-5s, AT&T 5ESSs and Northern Telecom DMS100s in its Florida network, it has allocated costs for all switch types to all states it operates. In other words, while Florida will incur some of the costs for the AT&T #2EAXs and Northern Telecom DMS10s, other states will also incur costs for switches located in other jurisdictions where GTE operates. GTEFL believes that this methodology is appropriate since these costs are common costs and will be incurred regardless of which state implements intraLATA presubscription. In addition, the methodology is consistent with how the Company currently allocates system and common central office expenses.

A breakdown of the software expenses allocated to Florida is shown in Attachment I. The proposed cost for the switching expenses is \$2,249,758. In addition, GTEFL estimates its total expense for engineering, installation, and translations for all switch types to be \$561,000. The engineering installation and translations costs are based only on the switches currently in GTEFL's network, which consist of 60 AGCS GTD-5s, 22 AT&T 5ESSs and 3 Northern Telecom DMS100s. The costs were determined per switch based on \$2,000 for engineering, \$3,600 for installation and \$1,000 for translation.

### **System Expenses**

The proposed system expenses relate to GTEFL's billing and administrative systems. The Company proposes to allocate these expenses based on accounting factors which GTE uses to allocate systems costs. The 10.5% allocation factor used for determining the expenses to be assigned to Florida is based on operating expenses, excluding general and administrative expenses. The Company's proposed billing system costs include its customer billing services system (CBSS) and carrier access billing system (CABS). While the CBSS is the billing and reports system for end user charges, the CABS is the billing and reporting system for special and switched access charges. The proposed costs for the

Company's administrative systems include expenses for service order modifications and administrative/operational support systems. A breakdown of the costs for the Company's billing and administrative systems is shown in Attachment I. In addition, GTEFL estimates its total expense for customer notification to be \$66,162.

GTEFL's interLATA originating MOUs for the most recent 12 month period ending December 1995 were 1,151,209,658 minutes. As shown in Attachment II, this equates to a proposed rate of \$.0009678 per originating FGD access minute over a 3-year recovery period. The Company proposes to add the cost recovery rate element to Section E6.6.6 of its Access Service Tariff.

Upon consideration, GTEFL's estimated implementation costs and FGD MOUs are appropriate for determining the recovery rate element for ILP. Therefore, the revisions the Company proposes shall be approved. The tariff shall be deemed effective May 1, 1996. The Company shall its first monitoring report 30 days following the end of the quarterly period that cost recovery was initiated. Based on an effective date of May 1, 1996, the Company shall file its first quarterly report on July 30, 1996.

V. GTEFL's Motions to Reopen the Record

On July 19, 1995, GTEFL filed a Motion to Reopen the Record "to admit critical evidence that was available at the time of the hearings but not revealed to the Commission." On July 25, 1995, GTEFL again requested that we reopen the record this time "to all parties to present argument and evidence regarding the effect of the Chapter 364 revisions on the Commission's Order approving presubscription." Subsequently, on August 29, 1995, the Company filed a Notice of Appeal of Orders PSC-95-0203-FOF-TP and PSC-95-0918-FOF-TP to the Florida Supreme Court. Upon filing of the notice of appeal, GTEFL's motions to reopen the record were abandoned.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that United Telephone Company of Florida's and Central Telephone Company of Florida's Petition for Waiver of Portions of Order No. PSC-95-0203-FOF-TP is granted as set forth in the body of this Order. It is further

ORDERED that BellSouth Telecommunications, Inc.'s, Access Services tariff which includes a new rate element for intraLATA equal access cost recovery and introduces several new services

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associated with intraLATA presubscription is, hereby, approved. It is further

ORDERED that BellSouth's proposed language changes in its Access Services Tariff and General Subscriber Service Tariff are, hereby, approved. It is further

ORDERED that GTE Florida, Inc.'s, Access Services tariff which includes a new rate element for intraLATA equal access cost recovery is, hereby, approved. It is further

ORDERED that BellSouth's and GTEFL's tariffs shall be effective May 1, 1996. It is further

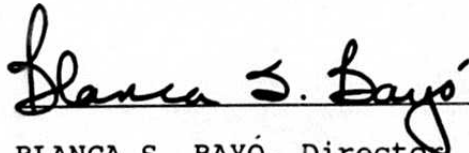
ORDERED that BellSouth and GTEFL shall each file quarterly monitoring reports as set forth in the body of this Order. It is further

ORDERED that GTEFL's motions to reopen the record are moot. It is further

ORDERED that if a protest is filed in accordance with the requirements set forth below, the tariff modifications shall remain in effect, with any increase in revenue held subject to refund, pending resolution of the protest. It is further

ORDERED that if no protest is filed in accordance with the requirements set forth below, this docket shall be closed.

By ORDER of the Florida Public Service Commission, this 23rd day of May, 1996.



BLANCA S. BAYÓ, Director  
Division of Records and Reporting

( S E A L )

MMB

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

The Commission's decision on this tariff is interim in nature and will become final, unless a person whose substantial interests are affected by the action proposed files a petition for a formal proceeding, as provided by Rule 25-22.036(4), Florida Administrative Code, in the form provided by Rule 25-22.036(7)(a)(d) and (e), Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on June 13, 1996.

In the absence of such a petition, this order shall become final on the day subsequent to the above date.

Any objection or protest filed in this docket before the issuance date of this Order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

If this Order becomes final on the date described above, any party adversely affected may request judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or by the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days of the date this Order becomes final, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

Attachment I

**GTEFL'S Cost of IntraLATA Equal Access**

| <b>Switch Expenses Allocated to Florida</b>   | <b>Total GTE Expense</b> | <b>GTEFL Expense</b> |
|---|--------------------------|----------------------|
| AGCS GTD-5  | \$12,549,115             | \$1,305,108          |
| AGCS 2EAX   | 298,788                  | 31,074               |
| AT&T 5ESS   | 3,207,000                | 333,528              |
| NTI DMS 100   | 3,187,077                | 331,456              |
| NTI DMS 10  | 2,390,308                | 248,592              |
|   |                          |                      |
| <b>Engineering/installation/translation</b>   |                          | 561,000              |
|   |                          |                      |
| <b>Systems Expenses Allocated to Florida</b>  |                          |                      |
| End User Billing Systems (CBSS)   | 377,739                  | 39,670               |
| Carrier Billing Systems   | 353,161                  | 37,090               |
| Service Order Modifications   | 3,108,620                | 326,467              |
| Admin/Oper Support Systems  | 593,148                  | 62,292               |
|   |                          |                      |
| <b>Customer Notification</b>  |                          | <b>66,162</b>        |
|   |                          |                      |
| <b>Total Florida Equal Access Costs</b>   |                          | <b>\$3,342,439</b>   |
|   |                          |                      |
| <b>Annual 1995 Originating FGD intrastate interLATA minutes</b>   |                          | <b>1,151,209,658</b> |
|   |                          |                      |
| <b>Rate per originating FGD intrastate interLATA access minutes (cost/minutes/3 year recovery period)</b> |                          | <b>\$.0009678</b>    |