



Public Service Commission

DATE: April 16, 2001

TO: Chairman E. Leon Jacobs, Jr.

Commissioner J. Terry Deason Commissioner Lila A. Jaber

FROM: Dave Dowds, Division of Competitive Services

RE: Docket No. 990649-TP

Based on a request initially from Chairman Jacobs' aide, staff has prepared, based on our recommended loop costs, an alternative deaveraging proposal that uses Sprint's 20% criterion. (Under Sprint's proposal, endorsed by the majority of CLECs, the average rate in a zone does not vary by more than 20% from the costs of the wire centers in the zone.) This analysis, with a comparison to staff's recommendation, is attached. Staff would note that we prepared this analysis and thus it does not appear explicitly in the record.

cc: MAB

WDH

BWS

SAS

B. Keating

N. Davis

H. McLean

990649-TP staff

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DN 990649-TP (BellSouth)

Total	16.47	196 100.0%	6,552,409 100.0%
' '	↔		.
Zone 3	41.94	26 13.3%	82,101 1.3%
	↔		
Zone 2	19.30 \$	87 44.4%	2,607,820 39.8%
	₩		
Zone 1	14.13	83 42.3%	3,862,488 58.9%
	€9		
Staff Recommendation	SL 1 rate	Number of Wire Centers	Total Number of Loops

Alternative Based on Sprint Proposed 20% Criterion

	171	Zone 1	171	Zone 2	Zone 3		Zone 4	7	Zone 5	Total	lei
SL1 rate	⇔	8.14	69	12.80	3 17.20	↔	30.63	⇔	50.46		16.47
Number of Wire Centers		4 2.0%		40 20.4%	110 56.1%		31 15.8%		11 5.6%	-	196 100.0%
Total Number of Loops		25,605 0.4%		1,864,157 28.4%	4,433,430		199,217 3.0%		30,000 0.5%	6,55	6,552,409

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