BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of   )
Unbundled Network Elements   )   Docket No. 990649-TP
)

DIRECT TESTIMONY OF

BERT I. STEELE

ON BEHALF OF

VERIZON FLORIDA INC.

SUBJECT: PROPOSED NON-RECURRING RATES

MAY 18, 2001

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3   **I.   INTRODUCTION**

4

5 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS**

6   **ADDRESS.**

7 A.   My name is Bert I. Steele. My business address is 600 Hidden Ridge

8   Drive, Irving, Texas 75038. I am employed by Verizon Services Group

9   as Manager - Pricing / Policy and I am representing Verizon Florida

10   Incorporated ("Verizon" or "Company"), formerly GTE Florida

11   Incorporated, in this proceeding.

12

13 **Q. PLEASE SUMMARIZE YOUR EDUCATION AND WORK EXPERIENCE.**

14 A.   I have a Bachelor of Science Degree in Mathematics from Gannon

15   University and a Master of Engineering Degree from Pennsylvania State

16   University. I joined General Telephone Company of Pennsylvania in

17   1972. Since then, I have worked for various GTE companies in

18   marketing services, pricing, costing, product management, valuation

19   engineering, and regulatory. For the past five years, I have been

20   responsible for formulating and implementing pricing and costing policies

21   for GTE's regulated services as related to the Telecommunications Act

22   of 1996 ("Act"). With Verizon, I am responsible for supporting the

23   Company's pricing proposals and associated policies for regulated

24   services.

25

1 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY REGULATORY

2   COMMISSIONS?

3 A. Yes. I have testified on numerous occasions in the area of

4   telecommunications ratemaking, cost methodologies and in proceedings

5   related to the Act. I have testified in the states of Alabama, California,

6   Florida, Hawaii, Illinois, Indiana, Michigan, North Carolina, Oklahoma,

7   Oregon, Pennsylvania, South Carolina, Texas, Virginia, and Wisconsin.

8

9 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

10 A. The purpose of my testimony in this proceeding is to present Verizon's

11   proposed non-recurring rates for ordering and service connection of

12   wholesale unbundled network elements ("UNEs"). Specifically, my

13   testimony addresses Issue 6, concerning the recovery of non-recurring

14   costs. I also address Issues 9a and 12, concerning proposed non-

15   recurring rates or charges for UNEs and combinations of UNEs. In

16   addition, my testimony responds to Issue 11a by presenting proposed

17   non-recurring rates for loop (or line) conditioning, including the situations

18   where the rates should be applied. Finally, I address Issue 11b by

19   proposing non-recurring rates that recover Verizon's loop qualification

20   costs.

21

22   My testimony is divided into five parts. Part I is the Introduction. Part II

23   addresses UNE ordering and service connection pricing and related

24   policy issues. In this discussion, I provide Verizon's pricing methodology

25   and its linkage to the Act and the FCC's First Report and Order

1		implementing the Act. (Implementation of the Local Competition
2		Provisions in the Telecomm. Act of 1996, First Report and Order, 11 FCC
3		Rcd 15499 (1996) (the "First Report and Order").) Part III addresses
4		Issue 6, regarding the recovery of non-recurring costs. Part IV addresses
5		Verizon's proposed non-recurring rates for UNEs and UNE combinations
6		in response to Issues 9a, 11a. 11b and 12. These rates are intended to
7		recover Verizon's costs for orders received and service connection
8		performed on behalf of competitive local exchange carriers ("CLECs"),
9		also referred to in Florida as alternative local exchange companies
10		("ALECs"). Finally, part V summarizes my testimony.
11		
12	Q.	**ARE YOU SPONSORING ANY EXHIBITS?**
13	A.	Yes. I am sponsoring the following three exhibits:
14		Exhibit BIS-1 Wholesale Non-Recurring Rate Summary
15		Exhibit BIS-2 Wholesale Non-Recurring Rates - Supporting Detail
16		Exhibit BIS-3 Rate Support for Recovery of NMC Shared / Fixed and
17		Loop Qualification Costs
18		
19	Q.	**PLEASE SUMMARIZE THE CONTENT OF THESE EXHIBITS.**
20	A.	Exhibit BIS-1 provides Verizon's proposed non-recurring rates supporting
21		its UNEs and UNE combinations. Exhibit BIS-2 provides the supporting
22		detail for Exhibit BIS-1. It identifies the cost elements or rate additives
23		included in each of the proposed non-recurring rates. The rate additives
24		for the National Market Center ("NMC") shared / fixed costs and the loop
25		qualification costs identified on Exhibit BIS-2 are presented in this

1   testimony. Verizon witness Larry Richter supports the remaining cost

2   element data listed on the exhibit. Exhibit BIS-3 provides a summary of

3   the total NMC shared / fixed costs and loop qualification costs and

4   addresses cost recovery by calculating the per-order rate additives

5   included in Verizon's proposed ordering rates. The calculation of each

6   per-order rate additive is included in this testimony, as is the rationale for

7   each of the rate additives.

8

9   II.   PRICING POLICY ISSUES

10

11   Q.   DOES THE ACT ENTITLE VERIZON TO RECOVER ITS ORDERING

12   AND SERVICE CONNECTION COSTS FROM CLECS?

13   A.   Yes. While Congress required ILECs, such as Verizon, to open their

14   networks to competition, it also sought to ensure that ILECs would be

15   compensated for the reasonable costs incurred in complying with this

16   mandate. Section 252(d)(1) of the Act states that interconnection and

17   UNE rates should be "just and reasonable" and "based on the cost

18   (determined without reference to a rate-of-return or other rate-based

19   proceeding) of providing the interconnection or network element

20   (whichever is applicable)." Accordingly, Verizon should not be expected

21   to subsidize competitive entry by CLECs – whenever Verizon provides a

22   UNE to a CLEC, it should be compensated for its "just and reasonable

23   cost." The Eighth Circuit Court has affirmed this principle: "Under the Act,

24   an incumbent LEC will recoup the costs involved in providing

25   interconnection and unbundled access from the competing carrier making

4

1		requests" (Iowa Utilities Bd. v. FCC, 120 F.3d 753, 810 (8th Cir. 1997)
2		(emphasis added)). In addition, with specific reference to operating
3		support systems ("OSS") costs, a federal district court upheld findings
4		that ILECs are entitled to recover their OSS costs from CLECs, stating:
5		"Because the electronic interfaces will only benefit the CLECs, the ILECs.
6		. . should not have to subsidize them. . . . AT&T is the cost causer, and
7		it should be the one bearing all the costs; there is absolutely nothing
8		discriminatory about this concept." (AT&T Communications of the South
9		Central States, Inc., v. BellSouth Telecommunications Inc., et al., 20 F.
10		Supp. 2d 1097 (Ky. Fed. Dist. Ct. 1998).)
11		
12	Q.	**DO VERIZON'S PROPOSED NON-RECURRING RATES COMPORT**
13		**WITH THE TELRIC APPROACH RELECTED IN FCC RULES 51.501 –**
14		**51.511?**
15	A.	Yes. Verizon's cost studies and proposed rates submitted in this
16		proceeding comport with the cost study approach reflected in the FCC's
17		pricing rules, including rule 51.505(b)(1), which has been invalidated by
18		the Eighth Circuit Court. (Iowa Utils. Bd. v. FCC, 219 F.3d 744 (8th Cir.
19		2000).) While Verizon has always opposed the FCC's TELRIC standard,
20		the Company has been obliged to go forward with its FCC-compliant
21		studies in this docket, given that the issue of appropriate cost
22		methodology has not yet been resolved at the federal level. I would
23		emphasize, however, that Verizon reserves its right to revise its costs and
24		proposed rates once this issue is settled.
25		

1   III.   RECOVERY OF NON-RECURRING COSTS (ISSUE 6)

2

3   Q.   UNDER WHAT CIRCUMSTANCES, IF ANY, IS IT APPROPRIATE TO

4   RECOVER NON-RECURRING COSTS THROUGH RECURRING

5   RATES?

6   A.   Generally, it is not appropriate to recover non-recurring costs through

7   recurring rates. If a cost is incurred only once, it should be recovered

8   through a one-time payment. Otherwise, the party that has incurred the

9   cost (here, the ILEC) acts as nothing more than a lender: it incurs an

10   immediate cost, but recovers its cost over time through a series of

11   payments.

12

13   There are two exceptions to this general rule. First, parties sometimes

14   agree to recover non-recurring costs through a monthly recurring rate.

15   In such instances, however, the parties' contract contains an early

16   termination provision, under which the buyer must pay its bill in full or

17   continue to make monthly payments (plus appropriate interest) even if it

18   discontinues operation.

19

20   Second, a company may charge a monthly recurring price for a non-

21   recurring cost where the cost object has a reasonably certain revenue-

22   producing life and is expected to be reusable by different customers. A

23   traditional example is the local loop – rather than assess a one-time

24   charge to an end user to recover the total cost of the loop, Verizon and

25   other ILECs assess monthly recurring charges. In the past, ILECs were

1		fairly certain that the local loop would be in service for a given period of
2		time and that customers would continue to use it (and thus pay for it) over
3		this entire period. Given the passage of the Act and the presence of
4		facilities-based carriers, however, there is much more uncertainty, which
5		must be reflected in the ILECs' cost of capital. In the same vein, ordering
6		and connection costs are truly customer specific and are caused by an
7		activity that is not reusable; therefore, a non-recurring recovery
8		mechanism has always been the most appropriate for these types of
9		costs.
10		
11	Q.	**PLEASE PROVIDE AN EXAMPLE OF HOW UTILITIES MAY EMPLOY**
12		**NON-RECURRING CHARGES FOR RECOVERY OF ONE-TIME**
13		**COSTS.**
14	A.	Many utilities assess a one-time "special construction charge" where a
15		customer requests a facility that is not usually deployed and is not
16		reasonably certain to be used by future customers. For example,
17		suppose a customer requests an exceptionally large and costly special
18		telecommunications facility to serve that customer's particular business
19		needs. If the ILEC believes the facility is not likely to be used by
20		subsequent tenants, it may assess a one-time charge to recover the
21		entire cost of the facility.
22		
23		Most ILECs, including Verizon, have tariff provisions that allow them to
24		assess such a charge under the circumstances described above. For
25		example, Section A5 of Verizon's General Services Tariff, which is titled

1		"Charges Applicable Under Special Conditions" gives the Company the
2		authority to institute one-time charges in cases that involve uncertain cost
3		recovery, unusually expensive equipment, no immediate prospect of
4		reusing the plant provided, and various other special circumstances.
5		
6		This one-time pricing structure is used because it best matches the cost
7		to the cost causer. In fact, if the ILEC were required to charge a monthly
8		recurring charge for the special facility and the customer subsequently
9		abandoned the plant, the ILEC would suffer a "stranded cost" that would
10		ultimately be borne by its other customers.
11		
12	Q.	ARE VERIZON'S PROPOSED NON-RECURRING RATES OR
13		CHARGES BASED ON THE PRINCIPLES YOU'VE OUTLINED?
14	A.	Yes, the Company's proposed non-recurring charges capture the ordering
15		and connection costs that are caused by the cost causer (e.g., the
16		CLEC).
17		
18		IV. PROPOSED NON-RECURRING RATES
19		(ISSUE 9a, 11a, 11b and 12)
20		
21	Q.	HOW WERE THE NON-RECURRING RATES FOR ORDERING AND
22		SERVICE CONNECTION DETERMINED?
23	A.	The Company has developed proposed rates that link the costs realized
24		by Verizon with the cost causer, the CLEC. The non-recurring rates for
25		service ordering and service connection activities are based on their cost

1		studies discussed by witness Larry Richter. Verizon is not proposing to
2		mark-up the costs that support its proposed non-recurring rates in this
3		proceeding. As such, these non-recurring rates are based on the cost of
4		the activities with no additional mark-up applied for common costs.
5		Accordingly, the development of the non-recurring rates is essentially a
6		simple process of mapping the appropriate cost elements to each rate
7		element and adding them up.
8		
9	Q.	**PLEASE DESCRIBE VERIZON'S PROPOSED WHOLESALE NON-**
10		**RECURRING RATE STRUCTURE.**
11	A.	Verizon's proposed non-recurring rate structure, with separate rates for
12		a relatively large number of possible CLEC requests, is quite specific.
13		The benefit of having this type of detail in the rate structure is that it
14		ensures that the rates charged will be as close as possible to Verizon's
15		ordering and service connection costs.
16		
17		The proposed non-recurring rates consist of ordering and service
18		connection charges that apply when a CLEC places a wholesale UNE
19		order with Verizon. Ordering charges are based on the costs for
20		processing CLEC requests by Verizon customer service representatives.
21		The service connection charges are based on the cost of facility
22		assignment, central office activity, field installation, and other work
23		necessary to get the CLEC's request properly into service. Both ordering
24		and service connection charges depend on what the CLEC is requesting.
25		

9

1		Verizon proposes wholesale non-recurring rates for the following types
2		of CLEC requests:
3		<u>Local Wholesale</u>
4	1.	Unbundled Loop
5	2.	Unbundled Port
6	3.	Unbundled Network Element –Platform Combination
7		("UNE-P")
8	4.	Unbundled Subloop
9	5.	Loop Qualification
10	6.	Loop Conditioning
11		
12		<u>Network Wholesale</u>
13	1.	Unbundled Network Interface Device ("NID")
14	2.	Dedicated Transport
15	3.	Signaling System 7 ("SS7")
16	4.	Enhanced Extended Link Combinations ("EELs")
17		
18		<u>Miscellaneous Wholesale</u>
19	1.	Coordinated Conversions
20	2.	Hot-Cut Coordinated Conversions
21	3.	Expedites
22	4.	Customer Record Search
23	5.	CLEC Account Establishment
24		
25		The non-recurring rate structure is defined further for each element.

1		Given an unbundled loop request, for example, the relevant non-recurring
2		rate would depend on whether it is for an exchange service (which does
3		not require design or engineering) versus an advanced service (which
4		requires design or engineering); on whether the request is for a basic
5		service (which is provisioned using standard network components without
6		specialized instructions) versus a complex service (which requires special
7		instructions and provisioning); and on whether the request is for an initial
8		service (a new service), a subsequent service (a change to an existing
9		service), a changeover as is, or a changeover as specified. Additional
10		detail is shown in Verizon's Non-Recurring Study, Section 1.
11		
12	Q.	**WHAT ARE THE NON-RECURRING RATES THAT VERIZON**
13		**PROPOSES FOR ORDERING AND SERVICE CONNECTION THAT**
14		**SUPPORT UNES AND UNE COMBINATIONS?**
15	A.	A summary of proposed rates is provided in Exhibit BIS-1. Additional
16		pricing detail supporting these rates is provided in Exhibit BIS-2 and
17		Exhibit BIS-3.
18		
19		Verizon proposes to establish separate rates for ordering and service
20		connection. Ordering charges are identified for the initial order and for
21		subsequent orders, when applicable. Initial ordering rates are applied per
22		order for the first time or as additional UNEs are added to serve a CLEC's
23		customer. Subsequent ordering rates are applied per order when a
24		CLEC requests changes to a customer's account that do not affect the
25		type of UNE being provided. The ordering rates are further identified by

1		the ordering process chosen by the CLEC, either manual or semi-
2		mechanized. Service connection charges are provided for the initial line
3		and for additional lines that terminate at the same service address and
4		are included on same CLEC order. This is the case for the loop, port,
5		UNE-P, subloop, loop qualification and loop conditioning. In addition,
6		rates for loop conditioning, if requested, are identified for service
7		connection only because order processing is incorporated into the
8		proposed rates for each applicable CLEC order.
9		
10	Q.	**PLEASE EXPLAIN FURTHER THE TWO TYPES OF NON-**
11		**RECURRING RATES.**
12	A.	The two types of non-recurring rates are the ordering rate and the service
13		connection rate.
14		The ordering rate reflects the costs Verizon incurs when CLECs place
15		orders for a UNE or for a UNE combination. To place an order, the CLEC
16		must submit a Local Service Request ("LSR") for a loop, NID, circuit
17		switch port, UNE-P, subloop, line sharing and for coordinated
18		conversions. An Access Service Request ("ASR") is submitted for dark
19		fiber, dedicated transport, SS7 and EELs. These orders are submitted
20		by the CLEC either electronically or manually (i.e., via a facsimile).
21		
22		The service connection rate reflects the cost of provisioning that order or
23		activity. It is a charge designed to recover the provisioning, central office
24		and field costs required for the UNE or UNE combination. The service
25		connection rates apply to each CLEC request consistent with the work

1		performed and cost realized by Verizon to satisfy the order. For instance,
2		the non-recurring charge to remove bridged taps is designed to recover
3		the costs of sending a technician to the field to remove the bridged taps.
4		
5	Q.	WHAT COSTS DO THESE NON-RECURRING RATES RECOVER?
6	A.	The non-recurring rates capture the costs that are caused by the CLECs'
7		requests for UNEs.
8		
9		The Company incurs three types of costs: (1) the variable costs
10		(principally, labor costs) that arise when workers review, process, and
11		provision CLEC orders; (2) the shared / fixed costs for the computers,
12		buildings, and similar facilities devoted to fulfilling CLEC requests at
13		Verizon's National Market Centers; and (3) the costs associated with the
14		development of OSS functions. This third category of costs includes
15		Verizon's OSS transition and transaction costs. Transition costs are
16		those incurred to establish mechanized systems. Transaction costs are
17		those incurred in processing CLEC orders. Verizon understands that
18		both types of OSS costs will be addressed in a later proceeding
19		specifically addressing OSS. However, Verizon's non-recurring rate
20		proposal here includes recovery of its loop qualification costs. Although
21		the Commission determined that such costs were "OSS-related" in
22		BellSouth's UNE proceeding, it concluded that rates should be set now
23		because CLECs desire mechanized loop qualification (termed "Loop
24		Make-Up" in BellSouth's case) and it is a new offering mandated by the
25		FCC and not previously considered by this Commission. (See Staff

1   Recommendation as to BellSouth in Docket 990649-TP, dated April 6,

2   2001. at 611 (approved with modifications on April 18, 2001) ("BellSouth

3   Recommendation").) As such, the parties agreed to add Issue 11(b) in

4   this proceeding, to specifically address loop qualification.

5

6   The ordering non-recurring rates include recovery of (1) variable ordering

7   costs, (2) NMC shared / fixed ordering costs, and (3) an amount for the

8   recovery of the OSS transition costs for Verizon's Mechanized Loop Pre-

9   Qualification ("MLPQ") process.   There are other OSS-related non-

10   recurring costs associated with ordering, but, as noted, I understand

11   these costs will be addressed later in a separate proceeding.

12

13   The service connection non-recurring rates are designed to recover the

14   variable provisioning costs incurred in fulfilling CLEC orders.   None of the

15   NMC shared / fixed costs or OSS transition / transaction costs are

16   included in Verizon's proposed rates for service connection.

17

18   The amounts for the NMC shared / fixed costs are added to each non-

19   recurring ordering rate for all LSRs. The proposed amount for the OSS

20   MLPQ transition costs is added to each non-recurring ordering rate for

21   line sharing LSRs. (Again, other applicable OSS costs will be addressed

22   in a separate proceeding.) Including these amounts in the non-recurring

23   rates acts to spread recovery of these costs over time and thus allows

24   CLECs to pay for these NMC shared / fixed and OSS costs in

25   installments. If the Commission disagrees with this rate structure, then

14

1   the costs must be wholly recovered through some other mechanism (e.g.,

2   a non-bypassable surcharge on all CLEC bills or all end-user bills, or a

3   one-time charge assessed to all CLECs).

4

5 Q. **PLEASE PROVIDE AN EXAMPLE OF THIS RATE DEVELOPMENT**

6   **PROCESS AS DOCUMENTED ON YOUR EXHIBIT BIS-2.**

7 A. Consider the case of an initial CLEC request for a standard UNE two-wire

8   loop with no special design or engineering required.

9

10   There are two basic non-recurring rates that are developed with this type

11   of request – ordering and service connection. The ordering charge is

12   either manual or semi-mechanized, depending on how the order was

13   placed. A manual order is typically one that Verizon receives by

14   facsimile. If additional units are ordered, then an additional unit service

15   connection non-recurring rate will apply for all additional units.

16

17   The non-recurring rates for the standard UNE two-wire loop are

18   essentially the sum of the various cost components associated with

19   completing this CLEC request.   Using this example, the variable

20   components are as follows:

21

22   • Exchange-Basic-New – Ordering and Service Connection Costs. In

23   this case, the two-wire loop UNE is for an exchange service (it does

24   not require design / engineering), is considered basic (standard

25   provisioning), and is new (it is an initial request for service). As shown

1   in the non-recurring cost study sponsored by Mr. Richter, these

2   include ordering (100% manual and semi-mechanized) and service

3   connection (initial unit and additional units) costs. The ordering costs

4   are primarily associated with the time that Verizon's customer service

5   representatives must spend processing this type of request (e.g.,

6   order entry into National Order Collection Vehicle, providing local

7   service confirmation to the CLEC, jeopardy notification, and error

8   correction). The service connection costs include the costs for facility

9   assignment (e.g., assignment of outside plant facilities and central

10   office line equipment for the service ordered), central office activity

11   (e.g., running jumpers on the Main Distribution Frame, Intermediate

12   Distribution Frames, or Tie Cable Frames), and field installation (e.g.,

13   cross-connect activity at the Feeder / Distribution Interface, cross-

14   connect box, pedestal or pole, or NID).

15

16   • Exchange-Basic-Disconnect – Ordering and Service Connection

17   Costs. This is the cost associated with the disconnection of a two-

18   wire loop UNE. As addressed in more detail by Mr. Richter, there will

19   be ordering costs and service connection costs. The ordering costs

20   are primarily associated with the time to process the order. The

21   service connection costs includes the costs for facility assignment

22   (e.g., update Company records, remove the jumper connection

23   associated with the 2-wire loop at the MDF or equivalent; generate a

24   jumper list for the central office technician; close out the order) and

25   central office activity (e.g., remove the jumper at the MDF or

1   equivalent).

2

3   • Pre-ordering Costs. Pre-ordering involves the customer service

4   representative entering the end-user information, providing a

5   telephone number (if requested), and verifying that vertical services

6   are available (if requested) to set up the customer record in advance

7   of the normal ordering process. Pre-ordering costs will often be

8   realized on manual orders.

9

10   • Record Order Costs. Processing CLEC orders causes record order

11   costs when the CLEC changes existing service records without

12   changing the service itself.

13

14   Using this example, the ordering components or rate additives for the

15   NMC shared / fixed costs and OSS costs are as follows:

16

17   • National Market Center – Shared / Fixed Costs. Verizon not only

18   provides customer service representatives to process CLEC orders,

19   but must also provide these representatives with the necessary

20   infrastructure to do their jobs. For instance, there are costs incurred

21   for the NMC building which houses the representatives, for the

22   interactive voice response (IVR) systems, and for office furniture and

23   personal computers. Costs of this nature make up NMC shared /

24   fixed costs. As discussed below, a reasonable pro-rata share of

25   these shared / fixed costs must be allocated to each order that is

1		processed at the NMC in order for Verizon to recoup its cost of
2		providing this infrastructure.
3		
4		• Operating Support Systems Costs. Verizon has expended a
5		considerable amount of resources to upgrade its OSS to give CLECs
6		the access to the same system information that Verizon utilizes for
7		itself, as well as to provide the information technology and data
8		processing necessary to support CLEC access to the OSS. Without
9		these system enhancements, Verizon's service representatives would
10		not be able to readily process CLEC requests. As addressed below,
11		a reasonable pro-rata share of Verizon's loop qualification costs is
12		included in each CLEC order for line sharing. The recovery of other
13		OSS costs will be addressed in a separate Commission proceeding.
14		
15		As shown in Exhibit BIS-2, the ordering and service connection rates for
16		an initial CLEC request for a UNE loop are simply the sum of the
17		Exchange-Basic-New, Exchange-Basic Disconnect, Preordering, Record
18		Order, NMC shared / fixed, and relevant OSS costs. No additional mark-
19		up to recover common costs is included in the proposed rate
20		development.
21		
22	Q.	WAS EACH RATE ELEMENT DEVELOPED IN A FASHION SIMILAR
23		TO THIS EXAMPLE?
24	A.	Yes. The rate development process is similar for the other rate elements
25		and involves identifying the appropriate cost elements that are associated

1   with the ordering and connection of each type of CLEC request and

2   summing them into the rate elements. This development is shown in

3   detail in Exhibit BIS-2, with additional support provided in Exhibit BIS-3.

4

5 Q. **WHAT ARE THE NMC SHARED / FIXED COSTS AND MLPQ COSTS**

6   **AS ADDRESSED IN EXHIBIT BIS-3?**

7   The NMC shared / fixed costs are related to the establishment and

8   ongoing maintenance of the NMCs that are dedicated to processing

9   LSRs submitted by CLECs. The NMCs exist only to process these LSRs

10   and would not be required if Verizon did not provide UNEs to CLECs.

11   The costs identified for Verizon's MLPQ (loop qualification) process

12   encompass the specific system development and enhancement costs

13   necessary to establish the MLPQ process. Further detail regarding these

14   NMC shared / fixed and MLPQ costs are provided by Mr. Richter.

15

16 Q. **PLEASE DESCRIBE THE ORDERING PROCESS FOR UNE**

17   **REQUESTS AS IT PERTAINS TO THE NMC.**

18 A. The CLEC may submit an LSR to establish a UNE or UNE combination

19   electronically or manually, via facsimile. Electronically submitted LSRs

20   are received by one of Verizon's NMCs. The NMC serves as the single

21   point of contact for pre-ordering and ordering local network UNEs,

22   including UNE combination requests. Verizon has three NMCs, located

23   in Durham, North Carolina; Ft. Wayne, Indiana; and Coeur d'Alene,

24   Idaho. If the CLEC submits the LSR manually, Verizon's off-line work

25   group in San Angelo, Texas enters the LSR into Verizon's Secure

1		Integrated Gateway System ("SIGS"). Once entered into SIGS, the order
2		flows into the NMC for processing.
3		
4	Q.	**HOW WERE THE VARIABLE AND NMC SHARED / FIXED COSTS**
5		**DEVELOPED?**
6	A.	The variable costs were developed based on the time needed to process
7		the different types of CLEC orders. Verizon Witness Richter's testimony
8		explains how the costs were developed by studying the different activities
9		associated with different types of CLEC requests and by applying current
10		labor rates. The NMC shared / fixed costs were developed based on the
11		costs actually incurred, as described in the Verizon cost study sponsored
12		by Mr. Richter. Again, Verizon proposes to recover these costs through
13		an additional amount included in the non-recurring rate for each LSR. As
14		is documented in my Exhibit BIS-2 and Exhibit BIS-3, whenever a CLEC
15		places an order involving the NMCs, the CLEC's "ordering" non-recurring
16		rate includes $4.47 for recovery of shared / fixed NMC costs. This
17		amount was developed by taking the annual NMC shared / fixed costs of
18		$18.648 million and dividing it by the 4.170 million average annual CLEC
19		orders expected over the 2001-2005 period.
20		
21	Q.	**PLEASE DESCRIBE THE ISSUES ASSOCIATED WITH MLPQ COST**
22		**RECOVERY.**
23	A.	The Company proposes a non-recurring rate additive amount for recovery
24		of the transition cost that Verizon realized to allow CLECs to perform loop
25		qualification utilizing the MLPQ process. Given that MLPQ costs should

1		be recovered from CLECs (because they are the parties demanding the
2		service), the most efficient pricing structure is one based on access to
3		and use of Verizon's systems. Thus, it is appropriate to establish a loop
4		qualification rate additive based on the relevant OSS costs and the
5		forecasted number of orders accepted by the iLEC to provision services
6		to CLECs. It is a relatively straightforward and simple matter to take the
7		total relevant costs and divide them by the forecasted orders to calculate
8		the loop charge.
9		
10	Q.	WHAT RATE ADDITIVE IS VERIZON PROPOSING FOR THE
11		RECOVERY OF MLPQ COSTS?
12	A.	Verizon proposes to charge an additional $0.51 per CLEC line sharing
13		request for recovery of these MLPQ costs. The calculation is
14		straightforward and detailed in Exhibit BIS-3. Specifically, the $0.51 LSR
15		rate additive is the total MLPQ transition costs of $1.014 million incurred
16		in 2000, divided by the three-year projected demand for line sharing
17		LSRs of 2.005 million. As such, the proposed rate additive is designed
18		to recover the $1.014 million in OSS MLPQ transition costs incurred over
19		the 2.005 million CLEC line sharing requests expected over the 2001 –
20		2003 time period.
21		
22	Q.	WHAT IF THE TOTAL NUMBER OF LSRS FOR THE THREE-YEAR
23		RECOVERY PERIODS DIFFERS FROM THE DEMAND FORECAST?
24	A.	Given the inherent uncertainty in demand forecasts and to ensure that
25		Verizon recovers all of these costs, Verizon proposes that the per-LSR

1   rate additives remain in place until 2.005 million line sharing LSR orders

2   have been processed within the old GTE serving territories. The per-LSR

3   rate additives could be applied beyond the three-year recovery period if

4   demand forecasts are overstated. This method provides a fair and

5   equitable means of recovering Verizon's MLPQ transition costs.

6

7 Q.   **YOU HAVE ADDRESSED VERIZON'S PROPOSED RECOVERY OF ITS**

8   **VARIABLE COSTS, ITS NMC SHARED / FIXED COSTS AND ITS**

9   **MLPQ COSTS. PLEASE PROVIDE AN EXAMPLE OF THESE COST**

10   **ELEMENTS OR RATE ADDITIVES USING THE PROPOSED NON-**

11   **RECURRING RATES LISTED ON EXHIBIT BIS-1.**

12 A.   Exhibit BIS-1 lists the proposed ordering and service connection rates for

13   a 2-wire loop (i.e., an exchange-basic loop). The total cost of ordering

14   (using the semi-mechanized method) is $29.38 and the proposed non-

15   recurring rate equals this cost (as stated above, without a common cost

16   mark-up). Exhibit BIS-2 also provides the detail supporting this rate,

17   including the variable costs associated with this order plus a share of the

18   NMC shared / fixed costs. The exhibit also provides a place marker for

19   OSS costs to be addressed in a separate proceeding (i.e., these OSS

20   costs are to be determined ("TBD") in separate proceeding). The

21   proposed non-recurring rate of $29.38 is also provided below by rate

22   element or cost recovery component.

23

24

25

	Rate Element Component	Amount Per-LSR Order
1		
2	Variable Ordering Cost	$24.91
3	NMC Shared/Fixed Cost	$ 4.47
4	OSS Transaction-Specific Cost	TBD in separate proceeding
5	OSS Transition Costs	TBD in separate proceeding
6	Total	$29.38

7

8   Exhibit BIS-1 also provides the total cost and proposed non-recurring

9   rates for <u>service connection</u>. For the 2-wire UNE loop, this rate is $63.28

10   for the initial line on the LSR order, which recovers the costs incurred in

11   the provisioning of line sharing. This service connection non-recurring

12   rate includes the variable costs. It does <u>not</u> include a share of the NMC

13   shared / fixed cost, since the NMC cost is caused by the ordering and not

14   the service connection. Likewise, the service connection rate does not

15   include OSS costs. Both NMC shared / fixed costs and MLPQ costs,

16   from a cost recovery perspective, are addressed in Verizon's proposed

17   non-recurring rates for LSR orders (i.e., in the ordering rates and not the

18   service connection rate).

19

20 **Q.** **VERIZON PROPOSES A SERVICE INQUIRY CHARGE FOR DARK**

21   **FIBER. PLEASE ADDRESS THIS CHARGE IN MORE DETAIL.**

22 **A.** Verizon has established a pre-ordering process, or dark fiber inquiry, to

23   determine if dark fiber is available between the locations and in the

24   quantities specified by the CLEC. The charge for this preordering activity

25   is based on Verizon's costs to review its cable records and is listed on

1   Exhibit BIS-1 as "Advanced – Service Inquiry Charge" in the "Unbundled

2   Dark Fiber" section of the exhibit. The inquiry charge is separate from

3   other non-recurring charges or rates for ordering and connection of dark

4   fiber interoffice transport, loops and subloops.

5

6 Q. **PLEASE EXPLAIN HOW THE PROCESS FOR ORDERING**

7   **UNBUNDLED DARK FIBER WILL WORK FOR BOTH LOOP AND**

8   **INTEROFFICE FACILITIES.**

9 A. First, a CLEC must submit an ASR Service Inquiry for each dark fiber

10   interoffice facility or loop / subloop facility requested so that Verizon can

11   initiate a review of its cable records to determine if dark fiber is available

12   between the locations and in the quantities specified. Verizon's plant

13   records for dark fiber are not mechanized at this time. Therefore, an

14   extensive manual effort is required by two different engineering groups

15   to determine whether unused fiber capacity even exists. Verizon

16   proposes to recover the costs associated with this effort through a non-

17   recurring "Advanced - Service Inquiry Charge."

18

19   Once the fiber information is provided to the CLEC, and assuming the

20   CLEC has pre-established its collocation arrangement or point of

21   connection, it can then submit a firm order through the ASR process.

22   Proposed non-recurring rates for ordering and connection will be applied

23   with the firm order. These proposed rates are shown in my Exhibit BIS-1.

24

25   To obtain access to dark fiber in the subloop, the CLEC must be pre-

1		positioned via the bona fide request ("BFR") or collocation process as
2		discussed above. Access to interoffice dark fiber, or the central office
3		end of the dark fiber loop or subloop, requires the CLEC to be collocated
4		in each central office, similar to how it gains access to other UNEs today.
5		
6	Q.	**BESIDES DETERMINING IF FIBER IS PHYSICALLY AVAILABLE,**
7		**DOES VERIZON USE ANY OTHER CRITERIA TO DETERMINE THE**
8		**AVAILABLITY OF DARK FIBER?**
9	A.	Yes. The FCC, in its UNE Remand Order, gave state commissions the
10		ability to establish reasonable limitations on access to dark fiber to meet
11		concerns about an ILEC's ability to provide service as a carrier of last
12		resort ("COLR"). (Implementation of the Local Competition Provisions of
13		the Telecomm. Act of 1996, Third Report and Order and Fourth Further
14		Notice of Proposed Rulemaking, 15 FCC Rcd 3696, at para. 199 (1999)
15		(the "Remand Order")). Such limitations are appropriate here.
16		
17		Because Verizon is a COLR, it must ensure that sufficient network
18		transmission capacity exists to meet its service commitments. Requiring
19		ILECs to make their reserve capacity available to new entrants
20		discourages otherwise efficient investment. Although Verizon is not
21		proposing to reserve unused fiber for its own use, the Company will
22		implement several reasonable limitations on dark fiber to ensure that it
23		can meet its COLR obligations as well as enable maintenance and
24		restoration activities. First. Verizon may reserve dark fiber for
25		maintenance / emergency restoration purposes or to satisfy customer

1		orders for fiber related services or for future growth. Second, the
2		Company does not allow competitors in any two-year period from leasing
3		more than 25% of the dark fiber in a given segment of the network.
4		Further, Verizon reserves the right to revoke leased fiber from CLECs
5		with 12 months notice, upon establishing need to the satisfaction of the
6		Commission, and also reserves the right to take back underused (less
7		than OC-12) fiber.
8		
9	Q.	**VERIZON HAS PROVIDED PROPOSED NON-RECURRING RATES**
10		**FOR LOOP CONDITIONING. WHAT IS LOOP CONDITIONING?**
11	A.	Under the FCC's Line Sharing Order, ILECs are required to "condition"
12		loops to allow requesting carriers to offer advanced services.
13		(Deployment of Wireline Services Offering Advanced Telecomm.
14		Capability and Implementation of the Local Competition Provisions of the
15		Telecomm. Act of 1996, Third Report and Order in CC Docket No. 98-
16		147 and Fourth Report and Order in CC Docket No. 96-98, 14 FCC Rcd
17		20912 (1999) (the "Line Sharing Order")). Loop conditioning is the
18		removal of load coils and/or bridged taps from the local cable pairs at the
19		CLEC's request to allow line sharing to occur. While load coils and
20		bridged taps have been, and for some loops, continue to be, an integral
21		part of the copper voice grade communications network, they impede the
22		transmission of digital signals. If the CLEC requires copper pairs without
23		load coil(s) or bridged tap(s) for the digital service it offers its end-user
24		customers, then the CLEC has the option of ordering loop conditioning
25		from Verizon.

1

2 Q. DO THE LOOP CONDITIONING NON-RECURRING RATES APPLY TO

3   ALL LOOPS REQUIRING LOOP CONDITIONING?

4 A. Yes. In the BellSouth UNE proceeding, the Commission correctly

5   concluded that the FCC's Remand Order allows ILECs to charge for loop

6   (or line) conditioning on all loops, whether over or under 18,000 feet in

7   length. Consistent with this holding, Verizon will assess its loop

8   conditioning non-recurring charge or rate, regardless of the loop length,

9   when the CLEC specifies on the LSR that loop conditioning is required.

10   These non-recurring rates, as listed in my Exhibit BIS-1, reflect the costs

11   that Verizon will incur to conditioning loops at the request of CLECs.

12

13 Q. WILL LOOP CONDITIONING BE PROVIDED UNDER ALL

14   CIRCUMSTANCES?

15 A. No. Loop conditioning will not be provided in cases where such

16   conditioning significantly degrades traditional voice band service that

17   Verizon offers to its end-users. This is in accordance with paragraph 85

18   of the FCC's Line Sharing Order, which states that "if conditioning a

19   particular loop for shared-line xDSL will significantly degrade that

20   customer's analog voice service, incumbent LECs are not required to

21   condition that loop for shared-line xDSL."

22

23

24

25

		V. SUMMARY

1

2

3 Q. **PLEASE SUMMARIZE YOUR TESTIMONY.**

4 A. My testimony provides the proposed non-recurring rates for UNEs and

5   UNE combinations as well as for loop conditioning. These rates are

6   intended to recover Verizon's costs for orders received and service

7   connections performed on behalf of the CLECs. They are based on costs

8   with no mark-up for common costs, since the Company is not proposing

9   to mark-up the costs that support its proposed non-recurring rates in this

10   proceeding.

11

12   The proposed non-recurring ordering and service connection rates for

13   UNEs, UNE combinations and for loop conditioning are listed in Exhibit

14   BIS-1. Additional pricing support is provided for in Exhibit BIS-2 and

15   Exhibit BIS-3.

16

17   Non-recurring rates are provided for both manual and semi-mechanized

18   ordering processes, and for initial and subsequent orders. The rates for

19   service connection are provided for both initial and additional lines that

20   terminate at the same service address and on the same CLEC order.

21   This is the case for all proposed service connection rates with the

22   exception of those for dedicated transport, SS7, dark fiber and EELs.

23   The service connection rates for these UNEs and UNE combinations are

24   applied on a per-order basis.

25

1   The rates for ordering include recovery of variable, NMC shared / fixed

2   and loop qualification costs. Verizon's proposal to recover its NMC

3   shared / fixed costs and its loop qualification (or MLPQ) costs on a per-

4   order basis properly links costs to the CLEC cost causer. Verizon's

5   proposed non-recurring rates do not include recovery of its other OSS

6   costs, as these costs will be dealt with in a separate Commission

7   proceeding.

8

9   The proposed rates for service connection for both UNEs and loop

10   conditioning do not include NMC shared / fixed costs, or loop qualification

11   costs. Only the variable costs are included in the service connection

12   rates. The rates for loop conditioning are provided for bridged tap

13   removal, load coil removal and for both bridged tap and load coil removal.

14   These rates are applicable when the CLEC requests loop conditioning

15   on an LSR order.

16

17   Finally, Verizon reserves the right to revise its UNE costs and proposed

18   rates, pending conclusion of the appeals of the Eighth Circuit Court's

19   decision invalidating certain of the FCC's UNE pricing rules.

20

21 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

22 A. Yes.

23

24

25

Verizon - Florida
Wholesale Non-recurring Study
Local Wholesale Elements
Rate Summary

Docket No 990649-TP
Direct Testimony of Bert I Steele
Exhibit BIS-1
FPSC Exhibit
May 18, 2001
Page1 of 5

| | Ordering | | Service Connection | |
Description	100% Manual	Semi-Mech	Initial Unit	Addt'l Unit
Unbundled Loop				
Exchange - Basic - Initial	$46 19	$29 38	$63 28	$62 53
Exchange - Basic - Subsequent	$19 33	$12 11	$16 80	$16 42
Exchange - Complex Non-digital - Initial	$46 19	$29 38	$53 59	$52 84
Exchange - Complex Non-digital - Subsequent	$19 33	$12 11	$16 80	$16 42
Exchange - Complex Digital - Initial	$46.19	$29 38	$61 26	$60 50
Exchange - Complex Digital - Subsequent	$19 33	$12.11	$16 80	$16 42
Advanced - Complex Digital - Initial	$52 89	$29.38	$509.84	$440 40
Advanced - Complex Digital - Subsequent	$19.33	$12 11	$93 93	$59.21
Unbundled Port				
Exchange - Basic - Initial	$42.56	$25 75	$38 23	$37 47
Exchange - Basic - Subsequent (Port Feature)	$23.44	$16.22	$1 97	$1.97
Exchange - Basic - Subsequent (CO Connection)	$19 33	$12.11	$16.80	$16.42
Exchange - Complex Non-digital - Initial	$57 59	$34 08	$75 56	$27.74
Exchange - Complex Non-digital -Subsequent (Port Feature)	$31 77	$24 55	$7 15	$7 15
Exchange - Complex Non-digital - Subsequent (Switch Feature Group)	$38 47	$24 55	$31.34	$8 24
Exchange - Complex Non-digital - Subsequent (CO Connection)	$19.33	$12.11	$16.80	$16.42
Exchange - Complex Digital - Initial	$57.59	$34 08	$83.46	$35.64
Exchange - Complex Digital - Subsequent (Port Feature)	$31.77	$24.55	$9.73	$9 73
Exchange - Complex Digital - Subsequent (Switch Feature Group)	$38.47	$24 55	$31 34	$8 24
Exchange - Complex Digital - Subsequent (CO Connection)	$19.33	$12.11	$16.80	$16.42
Advanced - Complex - Initial	$67.44	$43.93	$331.41	$261 97
Advanced - Complex - Subsequent	$22 20	$14.98	$93 93	$59 21

Verizon - Florida
Wholesale Non-recurring Study
Local Wholesale Elements
Rate Summary

Docket No 990649-TP
Direct Testimony of Bert I. Steele
Exhibit BIS-1
FPSC Exhibit
May 18, 2001
Page2 of 5

Description	Ordering		Service Connection	
	100% Manual	Semi-Mech.	Initial Unit	Addt'l Unit
UNE Platforms (UNE-Ps)				
Exchange - Basic - Subsequent	$19 46	$12 24	$1.97	$1 97
Exchange - Basic - Changeover (As Specified)	$23 67	$14 59	$11.58	$11 58
Exchange - Complex Non-digital - Subsequent (Line Feature)	$19 46	$12 24	$7 15	$7 15
Exchange - Complex Non-digital - Subsequent (Switch Feature Group)	$26 16	$12 24	$31 34	n/a
Exchange - Complex Non-digital - Changeover (As Specified)	$35.14	$19 36	$26 43	$3 33
Exchange - Complex Digital - Subsequent (Line Feature)	$19 46	$12.24	$9 73	$9 73
Exchange - Complex Digital - Subsequent (Switch Feature Group)	$26 16	$12.24	$27 89	n/a
Exchange - Complex Digital - Changeover (As Specified)	$35 14	$19.36	$29 17	$6 07
Advanced - Complex - Subsequent	$28.68	$14 76	$97 70	$63 36
Advanced - Complex - Changeover (As Specified)	$51.03	$35 25	$125.79	$91 45
Subloop				
Exchange - FDI Feeder Connection - Initial	$46 19	$29.38	$65 21	$34.56
Exchange - FDI Feeder Connection - Subsequent	$19.33	$12 11	$25 60	$11.06
Exchange - FDI Distribution Connection - Initial	$46 19	$29 38	$92 13	$62 24
Exchange - FDI Distribution Connection - Subsequent	$19 33	$12 11	$25 60	$11.06
Serving Terminal Connection - Initial	$46.19	$29.38	$44 72	$23.85
Serving Terminal Connection - Subsequent	$19.33	$12 11	$19 98	$9 82
Line Sharing				
Exchange - CLEC CO Splitter Connection - Initial	Not Included in this Filing			
Exchange - CLEC CO Splitter Connection - Subsequent	Not Included in this Filing			
Loop Qualification				
Loop Qualification (per line sharing order)	$0.51	$0.51	n/a	n/a
Loop Conditioning				
Bridged Tap Removal Only	n/a	n/a	$2,483.17	$43.58
Load Coil Removal Only	n/a	n/a	$2,929.23	$86.47
Bridged Tap and Load Coil Removal	n/a	n/a	$3,524 02	$130 05

Verizon - Florida
Wholesale Non-recurring Study
Network Wholesale Elements
Rate Summary

Docket No. 990649-TP
Direct Testimony of Bert I Steele
Exhibit BIS-1
FPSC Exhibit
May 18, 2001
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Description	Ordering		Service Connection *	
	100% Manual	Semi-Mech.	Initial Unit	Addt'l Unit
Unbundled NID				
Exchange	$42.36	$30.02	$1.97	n/a
Unbundled House and Riser				
Exchange	$42.36	$30.02	$10.81	n/a
Inter-office Dedicated Transport				
Advanced - Basic - Initial	$111 00	$76 44	$428 47	n/a
Advanced - Basic - Subsequent	$49 60	$31 50	$119.58	n/a
Advanced - Complex - Initial	$123 53	$88 97	$599.79	n/a
Advanced - Complex - Subsequent	$49 60	$31.50	$119 94	n/a
CLEC Dedicated Transport				
Entrance Facility/Dedicated Transport DS0 - Initial	$111.00	$76 44	$558.81	n/a
Entrance Facility/Dedicated Transport DS0 - Subsequent	$49 60	$31 50	$130.78	n/a
Entrance Facility/Dedicated Transport DS1/DS3 - Initial	$123 53	$88 97	$759 83	n/a
Entrance Facility/Dedicated Transport DS1/DS3 - Subsequent	$49 60	$31.50	$131.14	n/a
Signaling System Seven (SS7)				
Facilities and Trunks - Initial	$297.64	$263.08	$1,018 06	n/a
Facilities and Trunks - Subsequent (w/Engineering Review)	$84.28	$66.18	$429.49	n/a
Facilities and Trunks - Subsequent (w/o Engineering Review)	$84.28	$66.18	$135.30	n/a
Trunks Only - Initial	$152.15	$117.59	$897.31	n/a
Trunks Only - Subsequent (w/Engineering Review)	$55 27	$37.17	$409.91	n/a
Trunks Only - Subsequent (w/o Engineering Review)	$55 27	$37.17	$135.30	n/a
STP Ports (SS7 Links)	$297 64	$263 08	$819.12	n/a

* Rates are applied on a per-order basis. Additional Unit column does not apply.

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Direct Testimony of Bert I. Steele
Exhibit BIS-1
FPSC Exhibit
May 18, 2001
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Verizon - Florida
Wholesale Non-recurring Study
Network Wholesale Elements
Rate Summary

| | Ordering | | Service Connection * | |
| | 100% | Semi- | Initial | Addt'l |
Description	Manual	Mech.	Unit	Unit
Enhanced Extended Links (EELs)				
Advanced - Basic - Initial	$111 00	$78.08	$612.63	n/a
Advanced - Basic - Subsequent	$49 60	$31 50	$119 58	n/a
Advanced - Basic - Changeover (As Is)	$120 84	$86 28	$33 74	n/a
DS0 - Initial	$111 00	$78 08	$529 18	n/a
DS0 - Subsequent	$49.60	$31.50	$119 58	n/a
DS0 - Changeover (As Is)	$120 84	$86 28	$33 74	n/a
DS1/DS3 - Initial	$123 53	$90 61	$770 14	n/a
DS1/DS3 - Subsequent	$49 60	$31 50	$119 94	n/a
DS1/DS3 - Changeover (As Is)	$133 37	$98 81	$33 74	n/a
Multiplexing - DS1 to Voice	n/a	n/a	$139 38	n/a
Multiplexing - DS3 to DS1	n/a	n/a	$170 64	n/a
Dark Fiber				
Advanced - Service Inquiry Charge	$361.30	$359.65	n/a	n/a
Advanced - UNE Inter-office Dedicated Transport	$88 18	$86 54	$198 34	n/a
Advanced - Unbundled Loop	$88 18	$86 54	$196 40	n/a
Advanced - Subloop Feeder	$88 18	$86 54	$196 40	n/a
Advanced - Subloop Distribution	$88 18	$86 54	$202 98	n/a

* Rates are applied on a per-order basis. Additional Unit column does not apply

Verizon - Florida
Wholesale Non-recurring Study
Miscellaneous Wholesale Elements
Rate Summary

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Direct Testimony of Bert I. Steele
Exhibit BIS-1
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Description	Ordering		Service Connection	
	100% Manual	Semi-Mech.	Initial Unit	Addt'l Unit
Coordinated Conversions				
Exchange - Standard Interval	$36 34	$36.34	n/a	n/a
Exchange - Additional Interval	$30.94	$30.94	n/a	n/a
Advanced - Standard Interval	$36 34	$36 34	n/a	n/a
Advanced - Additional Interval	$30 94	$30 94	n/a	n/a
Hot-Cut Coordinated Conversions				
Exchange - Standard Interval	$129 15	$129.15	n/a	n/a
Exchange - Additional Interval	$30 94	$30.94	n/a	n/a
Advanced - Standard Interval	$129.15	$129.15	n/a	n/a
Advanced - Additional Interval	$30 94	$30.94	n/a	n/a
Expedites				
UNE Loop/Port - Exchange Services	$4.57	$4.57	n/a	n/a
UNE Loop/Port - Advanced Services	$35 59	$35.59	n/a	n/a
Other Charges				
Customer Record Search (per account)	$5 73	n/a	n/a	n/a
CLEC Account Establishment (per CLEC)	$226 38	$226 38	n/a	n/a
No Access Customer Will Advise	$78 09	$78 09	n/a	n/a

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Exhibit BIS-2
FPSC Exhibit
May 18, 2001
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Verizon - Florida
Wholesale Non-recurring Study
Rate Development
Dark Fiber - Service Inquiry

		Weighted Units					
		Ordering		Service Connection		Service Inquiry	
		Manual Weighted Units	Semi-Mech. Weighted Units	Initial Weighted Units	Addt'l Weighted Units	100% Manual	Semi-Mech.
Ln	Description	A=Source	B=Source	C=Source	D=Source	E=A+C	F=B+C
	Advanced						
	Dark Fiber						
	Preordering						
1	Exchange Facilities	$1.88	$1.47	$51.69	n/a		
2	Inter-office Facilities	$5.65	$4.42	$302.08	n/a		
3	**Total**	$7.53	$5.89	$353.77	n/a	$361.30	$359.65

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FPSC Exhibit
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Verizon - Florida
Wholesale Non-recurring Study
Rate Development
Order Weighting Factors

								Weighting			
								Ordering		Service Connection	
		Ordering		Service Connection			Manual	Semi-Mech.	Initial	Addt'l
		100%	Semi-	Initial	Addt'l	Weighting	Weighted	Weighted	Weighted	Weighted
Ln	Description	Manual	Mech.	Unit	Unit	Factor	Units	Units	Units	Units
		A=Source	B=Source	C=Source	D=Source	E=Note 1	F=A*E	G=B*E	H=C*E	I=D*E
	Advanced									
	Dark Fiber									
	Preordering									
1	Exchange Facilities	$7.53	$5 89	$206.76	n/a	25 00%	$1.88	$1.47	$51.69	n/a
2	Inter-office Facilities	$7.53	$5 89	$402.77	n/a	75.00%	$5.65	$4.42	$302.08	n/a
3	Total						$7 53	$5.89	$353 77	n/a
	Loop Conditioning									
	Bridged Tap Removal									
4	One Occurrence	n/a	n/a	$2,237 87	$24 90	50 00%	n/a	n/a	$1,118 93	$12 45
5	Multiple Occurrences	n/a	n/a	$2,728 48	$62 27	50 00%	n/a	n/a	$1,364 24	$31 13
6	Total						n/a	n/a	$2,483.17	$43.58
	Bridged Tap/Load Coil Combination									
7	One Occurrence	n/a	n/a	$3,278.71	$111.36	50.00%	n/a	n/a	$1,639.36	$55 68
8	Multiple Occurrences	n/a	n/a	$3,769 32	$148 73	50 00%	n/a	n/a	$1,884.66	$74.37
	Total						n/a	n/a	$3,524.02	$130.05

Note 1: Weighting Factors provided by Product Management.

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Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Initial Unit Provis.	Service Connection - Initial Unit CO Work	Service Connection - Initial Unit Field Install.	Service Connection - Initial Unit Total	Service Connection - Addt'l Unit Provis.	Service Connection - Addt'l Unit CO Work	Service Connection - Addt'l Unit Field Install.	Service Connection - Addt'l Unit Total
		A=Source	B=Source	C=PRO-1	D=FWS-1	E=FWS-1	F=Sum (C E)	G=PRO-1	H=FWS-1	I=FWS-1	J=Sum (G .I)
	Unbundled Loop										
	Exchange										
	Basic										
	Initial										
1	New	$25.79	$15.81	$11 53	$6.29	$35 50	$53 33	$11 53	$5 91	$35 50	$52 95
2	Disconnect	$12.72	$8 25	$6.88	$2.64	$0 43	$9 95	$6 88	$2 27	$0 43	$9 57
3	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	Record Order	$1.19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	**Total**	**$46.19**	**$29.38**	**$18.42**	**$8 94**	**$35.93**	**$63.28**	**$18.42**	**$8.18**	**$35.93**	**$62.53**
	Subsequent										
9	Change CO Connection	$11.65	$6 79	$8.24	$8.56	n/a	$16 80	$8 24	$8.18	n/a	$16.42
10	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
11	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
12	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15	**Total**	**$19.33**	**$12.11**	**$8.24**	**$8.56**	**n/a**	**$16.80**	**$8.24**	**$8.18**	**n/a**	**$16.42**

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Ln	Description	Ordering 100% Manual	Semi-Mech.	Service Connection - Initial Unit Provis.	CO Work	Field Install.	Total	Service Connection - Addt'l Unit Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-1	D=FWS-1	E=FWS-1	F=Sum (C..E)	G=PRO-1	H=FWS-1	I=FWS-1	J=Sum (G .I)
	Unbundled Loop										
	Exchange										
	Complex Non-digital										
	Initial										
16	New	$25.79	$15.81	$6.35	$6.29	$35.50	$48 15	$6 35	$5 91	$35.50	$47 77
17	Disconnect	$12.72	$8.25	$2.37	$2.64	$0.43	$5.44	$2 37	$2 27	$0.43	$5 07
18	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
19	Record Order	$1 19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
20	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
21	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
22	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
23	**Total**	**$46.19**	**$29.38**	**$8.73**	**$8.94**	**$35 93**	**$53.59**	**$8.73**	**$8 18**	**$35.93**	**$52.84**
	Subsequent										
24	Change CO Connection	$11 65	$6.79	$8.24	$8.56	n/a	$16 80	$8.24	$8 18	n/a	$16.42
25	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
26	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
27	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
28	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
29	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
30	**Total**	**$19.33**	**$12.11**	**$8.24**	**$8.56**	n/a	**$16.80**	**$8.24**	**$8.18**	n/a	**$16.42**

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Ln	Description	Ordering		Service Connection - Initial Unit				Service Connection - Addt'l Unit			
		100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-1	D=FWS-1	E=FWS-1	F=Sum (C..E)	G=PRO-1	H=FWS-1	I=FWS-1	J=Sum (G I)
	Unbundled Loop										
	Exchange										
	Complex Digital										
	Initial										
31	New	$25.79	$15.81	$10.69	$6.29	$35.50	$52.48	$10 69	$5 91	$35 50	$52 10
32	Disconnect	$12.72	$8 25	$5.70	$2.64	$0 43	$8 78	$5 70	$2 27	$0 43	$8.40
33	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
34	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
35	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
36	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
37	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
38	Total	$46.19	$29.38	$16.39	$8.94	$35.93	$61.26	$16 39	$8.18	$35 93	$60.50
	Subsequent										
39	Change CO Connection	$11 65	$6.79	$8.24	$8.56	n/a	$16 80	$8.24	$8 18	n/a	$16.42
40	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
41	Record Order	$1.19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
42	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
43	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
44	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
45	Total	$19.33	$12.11	$8.24	$8.56	n/a	$16.80	$8.24	$8.18	n/a	$16.42

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Ln	Description	Ordering 100% Manual	Ordering Semi- Mech.	Service Connection - Initial Unit Provis.	Service Connection - Initial Unit CO Work	Service Connection - Initial Unit Field Install.	Service Connection - Initial Unit Total	Service Connection - Addt'l Unit Provis.	Service Connection - Addt'l Unit CO Work	Service Connection - Addt'l Unit Field Install.	Service Connection - Addt'l Unit Total
		A=Source	B=Source	C=PRO-1	D=FWS-1	E=FWS-1	F=Sum (C..E)	G=PRO-1	H=FWS-1	I=FWS-1	J=Sum (G. I)
	Unbundled Loop										
	Advanced										
	Complex Digital										
	Initial										
61	New	$32.49	$15.81	$194.47	$15 76	$122.15	$332.38	$160.13	$15.38	$122 15	$297 66
62	Disconnect	$12.72	$8.25	$82.02	$2.64	$92 80	$177.46	$47 68	$2.27	$92 80	$142.75
63	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
64	Record Order	$1 19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
65	NMC Shared/Fixed Costs	$4.47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
66	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
67	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
68	**Total**	**$52.89**	**$29.38**	**$276.49**	**$18.40**	**$214.95**	**$509.84**	**$207 81**	**$17.64**	**$214.95**	**$440.40**
	Subsequent										
69	Change CO Connection	$11.65	$6.79	$78.17	$15 76	n/a	$93 93	$43.83	$15 38	n/a	$59.21
70	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
71	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
72	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
73	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
74	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
75	**Total**	**$19.33**	**$12.11**	**$78.17**	**$15.76**	n/a	**$93.93**	**$43 83**	**$15 38**	n/a	**$59.21**

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Ln	Description	Ordering 100% Manual	Ordering Semi- Mech.	Service Connection - Initial Unit Provis.	CO Work	Field Install.	Total	Service Connection - Addt'l Unit Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-1	D=FWS-2	E=FWS-2	F=Sum (C. E)	G=PRO-1	H=FWS-2	I=FWS-2	J=Sum (G. I)
	Unbundled Port										
	Exchange										
	Basic										
	Initial										
1	New	$25 40	$15.42	$16.84	$6.29	n/a	$23 13	$16 84	$5 91	n/a	$22 75
2	Disconnect	$9.48	$5.01	$12.46	$2 64	n/a	$15 10	$12 46	$2 27	n/a	$14 72
3	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	NMC Shared/Fixed Costs	$4.47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	**Total**	**$42.56**	**$25.75**	**$29.30**	**$8.94**	n/a	**$38.23**	**$29.30**	**$8.18**	n/a	**$37.47**
	Subsequent - Port Feature										
9	Change Port Feature	$15 76	$10.90	$1.97	n/a	n/a	$1 97	$1 97	n/a	n/a	$1 97
10	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
11	Record Order	$1 19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
12	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15	**Total**	**$23.44**	**$16.22**	**$1.97**	n/a	n/a	**$1.97**	**$1.97**	n/a	n/a	**$1.97**
	Subsequent - CO Connection										
16	Change CO Connection	$11.65	$6.79	$8.24	$8.56	n/a	$16.80	$8.24	$8.18	n/a	$16.42
17	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
18	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
19	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
20	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
21	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
22	**Total**	**$19.33**	**$12.11**	**$8.24**	**$8.56**	n/a	**$16.80**	**$8.24**	**$8.18**	n/a	**$16.42**

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Ln	Description	Ordering		Service Connection - Initial Unit				Service Connection - Addt'l Unit			
		100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-1	D=FWS-2	E=FWS-2	F=Sum (C..E)	G=PRO-1	H=FWS-2	I=FWS-2	J=Sum (G I)
	Exchange										
	Complex Non-digital										
	Initial										
23	New	$40.43	$23 75	$36.23	$6 29	n/a	$42 52	$13 13	$5 91	n/a	$19 01
24	Disconnect	$9.48	$5.01	$30.39	$2.64	n/a	$33 03	$6.43	$2 27	n/a	$8 70
25	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
26	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
27	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
28	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
29	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
30	**Total**	$57.59	$34.08	$66.62	$8.94	n/a	$75.56	$19.56	$8.18	n/a	$27.74
	Subsequent - Port Feature										
31	Change Port Feature	$24.09	$19.23	$7.15	n/a	n/a	$7 15	$7 15	n/a	n/a	$7 15
32	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
33	Record Order	$1.19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
34	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
35	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
36	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
37	**Total**	$31.77	$24.55	$7.15	n/a	n/a	$7.15	$7.15	n/a	n/a	$7.15
	Subsequent - Switch Feature Group										
38	Change Switch Feature Group	$30.79	$19.23	$31.34	n/a	n/a	$31 34	$8.24	n/a	n/a	$8 24
39	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
40	Record Order	$1 19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
41	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
42	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
43	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
44	**Total**	$38.47	$24.55	$31.34	n/a	n/a	$31.34	$8.24	n/a	n/a	$8.24
	Subsequent - CO Connection										
45	Change CO Connection	$11.65	$6.79	$8.24	$8 56	n/a	$16.80	$8.24	$8.18	n/a	$16.42
46	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
47	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
48	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
49	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
50	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
51	**Total**	$19.33	$12.11	$8.24	$8.56	n/a	$16.80	$8.24	$8.18	n/a	$16.42

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Ln	Description	Ordering 100% Manual	Semi- Mech.	Service Connection - Initial Unit Provis.	CO Work	Field Install.	Total	Service Connection - Addt'l Unit Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-1	D=FWS-2	E=FWS-2	F=Sum (C. E)	G=PRO-1	H=FWS-2	I=FWS-2	J=Sum (G..I)
	Exchange										
	Complex Digital										
	Initial										
52	New	$40 43	$23.75	$39 27	$6 29	n/a	$45 56	$16 17	$6 91	n/a	$23 08
53	Disconnect	$9 48	$5 01	$35 25	$2 64	n/a	$37 89	$11 29	$2 27	n/a	$13 56
54	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
55	Record Order	$1.19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
56	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
57	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
58	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
59	**Total**	$57.59	$34.08	$74.52	$8 94	n/a	$83.46	$27.46	$8.18	n/a	$35.64
	Subsequent - Port Feature										
60	Change Port Feature	$24 09	$19.23	$9.73	n/a	n/a	$9 73	$9 73	n/a	n/a	$9 73
61	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
62	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
63	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
64	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
65	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
66	**Total**	$31.77	$24.55	$9.73	n/a	n/a	$9.73	$9.73	n/a	n/a	$9.73
	Subsequent - Switch Feature Group										
67	Change Switch Feature Group	$30.79	$19.23	$31.34	n/a	n/a	$31.34	$8.24	n/a	n/a	$8.24
68	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
69	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
70	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
71	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
72	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
73	**Total**	$38.47	$24.55	$31.34	n/a	n/a	$31.34	$8.24	n/a	n/a	$8.24
	Subsequent - CO Connection										
74	Change CO Connection	$11.65	$6.79	$8.24	$8.56	n/a	$16.80	$8.24	$8.18	n/a	$16.42
75	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
76	Record Order	$1 19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
77	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
78	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
79	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
80	**Total**	$19.33	$12.11	$8.24	$8.56	n/a	$16.80	$8.24	$8.18	n/a	$16.42

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Wholesale Non-recurring Study
Rate Development
Unbundled Port

Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Initial Unit Provis.	Service Connection - Initial Unit CO Work	Service Connection - Initial Unit Field Install.	Service Connection - Initial Unit Total	Service Connection - Addt'l Unit Provis.	Service Connection - Addt'l Unit CO Work	Service Connection - Addt'l Unit Field Install.	Service Connection - Addt'l Unit Total
		A=Source	B=Source	C=PRO-1	D=FWS-2	E=FWS-2	F=Sum (C..E)	G=PRO-1	H=FWS-2	I=FWS-2	J=Sum (G..I)
	Advanced										
	Complex										
	Initial										
81	New	$46.83	$30.15	$214.00	$15 76	n/a	$229 76	$179 66	$15 38	n/a	$195 04
82	Disconnect	$12 93	$8.46	$99.01	$2.64	n/a	$101.65	$64.67	$2.27	n/a	$66 94
83	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
84	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
85	NMC Shared/Fixed Costs	$4.47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
86	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
87	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
88	**Total**	$67.44	$43.93	$313.01	$18.40	n/a	$331.41	$244.33	$17.64	n/a	$261.97
	Subsequent - CO Connection										
89	Change CO Connection	$14 52	$9.66	$78.17	$15 76	n/a	$93 93	$43 83	$15 38	n/a	$59 21
90	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
91	Record Order	$1 19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
92	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
93	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
94	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
95	**Total**	$22.20	$14.98	$78.17	$15.76	n/a	$93.93	$43.83	$15.38	n/a	$59.21

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UNE-Platforms (UNE-Ps)

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Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Initial Unit Provis.	CO Work	Field Install.	Total	Service Connection - Addt'l Unit Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-4	D=FWS-4	E=FWS-4	F=Sum (C. E)	G=PRO-4	H=FWS-4	I=FWS-4	J=Sum (G I)
	UNE-Platforms (UNE-Ps)										
	Exchange										
	Basic										
	Subsequent										
1	Change Line Feature	$12 01	$7 15	$1 97	n/a	n/a	$1 97	$1 97	n/a	n/a	$1 97
2	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	Record Order	$0 96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	Total	$19.46	$12.24	$1 97	n/a	n/a	$1.97	$1 97	n/a	n/a	$1.97
	Basic										
	Changeover (As Specified)										
8	Migration As Is +/-	$16.22	$9.50	$11.58	n/a	n/a	$11.58	$11 58	n/a	n/a	$11 58
9	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
10	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
11	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
12	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	Total	$23.67	$14.59	$11.58	n/a	n/a	$11.58	$11.58	n/a	n/a	$11.58

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Wholesale Non-recurring Study
Rate Development
UNE-Platforms (UNE-Ps)

Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Initial Unit Provis.	CO Work	Field Install.	Total	Service Connection - Addt'l Unit Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-4	D=FWS-4	E=FWS-4	F=Sum (C. E)	G=PRO-4	H=FWS-4	I=FWS-4	J=Sum (G I)
	UNE-Platforms (UNE-Ps)										
	Exchange										
	Complex Non-digital										
	Subsequent (Line Feature)										
15	Change Line Feature	$12.01	$7.15	$7 15	n/a	n/a	$7 15	$7 15	n/a	n/a	$7 15
16	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
17	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
18	NMC Shared/Fixed Costs	$4.47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
19	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
20	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
21	**Total**	$19.46	$12.24	$7.15	n/a	n/a	$7.15	$7.15	n/a	n/a	$7.15
	Complex Non-digital										
	Subsequent (Switch Feature Group)										
22	Change Switch Feature Group	$18.71	$7.15	$31.34	n/a	n/a	$31.34	n/a	n/a	n/a	n/a
23	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
24	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
25	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
26	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
27	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
28	**Total**	$26.16	$12.24	$31 34	n/a	n/a	$31.34	n/a	n/a	n/a	n/a
	Complex Non-digital										
	Changeover (As Specified)										
29	Migration As Specified	$27.69	$14.27	$26.43	n/a	n/a	$26.43	$3.33	n/a	n/a	$3.33
30	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
31	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
32	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
33	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
34	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
35	**Total**	$35.14	$19.36	$26.43	n/a	n/a	$26.43	$3.33	n/a	n/a	$3.33

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Wholesale Non-recurring Study
Rate Development
UNE-Platforms (UNE-Ps)

Ln	Description	Ordering		Service Connection - Initial Unit				Service Connection - Addt'l Unit			
		100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-4	D=FWS-4	E=FWS-4	F=Sum (C E)	G=PRO-4	H=FWS-4	I=FWS-4	J=Sum (G I)
	UNE-Platforms (UNE-Ps)										
	Exchange										
	Complex Digital										
	Subsequent (Line Feature)										
36	Change Line Feature	$12.01	$7.15	$9.73	n/a	n/a	$9.73	$9 73	n/a	n/a	$9.73
37	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
38	Record Order	$0 96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
39	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
40	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
41	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
42	**Total**	**$19.46**	**$12.24**	**$9.73**	n/a	n/a	**$9.73**	**$9.73**	n/a	n/a	**$9.73**
	Complex Digital										
	Subsequent (Switch Feature Group)										
43	Change Switch Feature Group	$18.71	$7.15	$27.89	n/a	n/a	$27.89	n/a	n/a	n/a	n/a
44	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
45	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
46	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
47	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
48	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
49	**Total**	**$26.16**	**$12.24**	**$27.89**	n/a	n/a	**$27.89**	n/a	n/a	n/a	**n/a**
	Complex Digital										
	Changeover (As Specified)										
50	Migration As Specified	$27.69	$14.27	$29.17	n/a	n/a	$29 17	$6.07	n/a	n/a	$6.07
51	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
52	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
53	NMC Shared/Fixed Costs	$4 47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
54	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
55	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
56	**Total**	**$35.14**	**$19.36**	**$29.17**	n/a	n/a	**$29.17**	**$6.07**	n/a	n/a	**$6.07**

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UNE-Platforms (UNE-Ps)

Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Initial Unit Provis.	Service Connection - Initial Unit CO Work	Service Connection - Initial Unit Field Install.	Service Connection - Initial Unit Total	Service Connection - Addt'l Unit Provis.	Service Connection - Addt'l Unit CO Work	Service Connection - Addt'l Unit Field Install.	Service Connection - Addt'l Unit Total
		A=Source	B=Source	C=PRO-4	D=FWS-4	E=FWS-4	F=Sum (C, E)	G=PRO-4	H=FWS-4	I=FWS-4	J=Sum (G, I)
	UNE-Platforms (UNE-Ps)										
	Advanced										
	Complex										
	Subsequent										
57	Change	$21.23	$9.67	$97.70	n/a	n/a	$97.70	$63.36	n/a	n/a	$63.36
58	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
59	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
60	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
61	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
62	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
63	Total	$28.68	$14.76	$97.70	n/a	n/a	$97.70	$63.36	n/a	n/a	$63.36
	Complex										
	Changeover (As Specified)										
64	Migration As Specified	$43.58	$30.16	$125.79	n/a	n/a	$125.79	$91.45	n/a	n/a	$91.45
65	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
66	Record Order	$0.96	$0.62	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
67	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
68	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
69	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
70	Total	$51.03	$35.25	$125.79	n/a	n/a	$125.79	$91.45	n/a	n/a	$91.45

Verizon - Florida
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Rate Development
Subloop

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Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Initial Unit Provis.	CO Work	Field Install.	Total	Service Connection - Addt'l Unit Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-2	D=FWS-5	E=FWS-5	F=Sum (C..E)	G=PRO-2	H=FWS-5	I=FWS-5	J=Sum (G..I)
	Unbundled Subloop										
	Exchange										
	FDI Feeder Connection										
	Initial										
1	New	$25.79	$15 81	$12 36	$6 29	$17 78	$36 43	$12 36	$5 91	$2 89	$21 16
2	Disconnect	$12 72	$8.25	$8 24	$2.64	$17 89	$28 78	$8 24	$2 27	$2 90	$13 41
3	Preordering	$2 02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	Record Order	$1 19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	NMC Shared/Fixed Costs	$4 47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	Total	$46.19	$29.38	$20.60	$8.94	$35 67	$65.21	$20 60	$8 18	$5 79	$34.56
	Subsequent										
9	Change Facility Connection	$11 65	$6 79	$8 24	n/a	$17 36	$25.60	$8.24	n/a	$2 82	$11 06
10	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
11	Record Order	$1 19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
12	NMC Shared/Fixed Costs	$4 47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15	Total	$19.33	$12.11	$8.24	n/a	$17.36	$25.60	$8.24	n/a	$2.82	$11.06
	FDI Distribution Connection										
	Initial										
16	New	$25.79	$15.81	$12.36	n/a	$53.21	$65.56	$12.36	n/a	$38 31	$50.67
17	Disconnect	$12.72	$8.25	$8.24	n/a	$18.32	$26.56	$8.24	n/a	$3.33	$11.57
18	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
19	Record Order	$1.19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
20	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
21	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
22	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
23	Total	$46.19	$29.38	$20.60	n/a	$71.53	$92.13	$20.60	n/a	$41.64	$62.24
	Subsequent										
24	Change Facility Connection	$11.65	$6.79	$8 24	n/a	$17.36	$25 60	$8.24	n/a	$2.82	$11.06
25	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
26	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
27	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
28	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
29	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
30	Total	$19.33	$12.11	$8.24	n/a	$17.36	$25.60	$8.24	n/a	$2.82	$11.06

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Rate Development
Subloop

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Ln	Description	Ordering		Service Connection - Initial Unit				Service Connection - Addt'l Unit			
		100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-2	D=FWS-5	E=FWS-5	F=Sum (C..E)	G=PRO-2	H=FWS-5	I=FWS-5	J=Sum (G..I)
	Unbundled Subloop										
	Exchange										
	Serving Terminal Connection										
	Initial										
31	New	$25.79	$15 81	$12.36	n/a	$12 02	$24 38	$12 36	n/a	$1 63	$13 98
32	Disconnect	$12.72	$8.25	$8 24	n/a	$12 10	$20.34	$8 24	n/a	$1 63	$9 87
33	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
34	Record Order	$1.19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
35	NMC Shared/Fixed Costs	$4.47	$4 47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
36	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
37	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
38	**Total**	$46.19	$29.38	$20.60	n/a	$24 13	$44.72	$20.60	n/a	$3.26	$23.85
	Subsequent										
39	Change Facility Connection	$11.65	$6 79	$8 24	n/a	$11 74	$19 98	$8 24	n/a	$1 59	$9 82
40	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
41	Record Order	$1 19	$0 85	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
42	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
43	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
44	OSS - Transition Costs	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
45	**Total**	$19.33	$12.11	$8.24	n/a	$11.74	$19.98	$8 24	n/a	$1.59	$9.82

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Rate Development

Line Sharing

Ln	Description	Ordering		Service Connection - Initial Unit				Service Connection - Addt'l Unit			
		100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-2	D=FWS-6	E=FWS-6	=Sum (C..E	G=PRO-2	H=FWS-6	I=FWS-6	J=Sum (G I)
	Line Sharing										
	Exchange										
	CLEC CO Splitter Connection										
	Initial										
1	New										
2	Disconnect										
3	Record Order										
4	NMC Shared/Fixed Costs										
5	OSS - Transaction Specific Costs										
6	OSS - Transition Costs										
7	Mechanized Loop Pre-Qualification										
8	Total										
	Subsequent										
9	Change CO Connection										
10	Record Order										
11	NMC Shared/Fixed Costs										
12	OSS - Transaction Specific Costs										
13	OSS - Transition Costs										
14	Mechanized Loop Pre-Qualification										
15	Total										

Not Included in this Filing

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Rate Development
Loop Conditioning

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Ln	Description	Ordering 100% Manual A=Source	Semi-Mech. B=Source	Service Connection - Initial Unit Provis. C=PRO-2	CO Work D=FWS-7	Field Install. E=FWS-7	Total F=Sum (C..E)	Service Connection - Addt'l Unit Provis. G=PRO-2	CO Work H=FWS-7	Field Install. I=FWS-7	Total J=Sum (G I)
	Loop Conditioning										
	Bridged Tap Only										
	Removal										
1	One Occurrence	n/a	n/a	n/a	n/a	$2,237.87	$2,237 87	n/a	n/a	$24 90	$24 90
2	Record Order	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	NMC Shared/Fixed Costs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	OSS - Transaction Specific Costs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	OSS - Transition Costs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	**Total**	n/a	n/a	n/a	n/a	$2,237 87	$2,237.87	n/a	n/a	$24.90	$24.90
7	Multiple Occurrences	n/a	n/a	n/a	n/a	$2,728.48	$2,728 48	n/a	n/a	$62.27	$62 27
8	Record Order	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
9	NMC Shared/Fixed Costs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
10	OSS - Transaction Specific Costs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
11	OSS - Transition Costs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
12	**Total**	n/a	n/a	n/a	n/a	$2,728 48	$2,728.48	n/a	n/a	$62 27	$62.27
	Load Coil Only										
	Removal										
13	Load Coil Removal	n/a	n/a	n/a	n/a	$2,929 23	$2,929.23	n/a	n/a	$86.47	$86.47
14	Record Order										
15	NMC Shared/Fixed Costs										
16	OSS - Transaction Specific Costs										
17	OSS - Transition Costs										
18	**Total**	n/a	n/a	n/a	n/a	$2,929.23	$2,929.23	n/a	n/a	$86 47	$86.47
	Bridged Tap and Load Coil Combination										
	Removal										
19	One Occurrence	n/a	n/a	n/a	n/a	$3,278 71	$3,278 71	n/a	n/a	$111 36	$111.36
20	Record Order										
21	NMC Shared/Fixed Costs										
22	OSS - Transaction Specific Costs										
23	OSS - Transition Costs										
24	**Total**	n/a	n/a	n/a	n/a	$3,278 71	$3,278.71	n/a	n/a	$111 36	$111.36
25	Multiple Occurrences	n/a	n/a	n/a	n/a	$3,769 32	$3,769.32	n/a	n/a	$148 73	$148 73
26	Record Order										
27	NMC Shared/Fixed Costs										
28	OSS - Transaction Specific Costs										
29	OSS - Transition Costs										
30	**Total**	n/a	n/a	n/a	n/a	$3,769.32	$3,769.32	n/a	n/a	$148.73	$148.73

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Rate Development
Unbundled Network Interface Device (NID)

		Ordering		Service Connection - Per Order			
Ln	Description	100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-5	D=FWS-8	E=FWS-8	F=SUM (C..E)
	Unbundled Network Interface Device (NID) Exchange						
1	Basic	$34.68	$24.70	n/a	n/a	$1.97	$1 97
2	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a
3	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a
4	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a
5	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
6	**Total**	$42.36	$30.02	n/a	n/a	$1.97	$1.97

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Rate Development
Unbundled House and Riser

		Ordering		Service Connection - Per Order			
Ln	Description	100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-5	D=FWS-8	E=FWS-8	F=SUM (C..E)
	Unbundled House and Riser Exchange						
1	Basic	$34.68	$24.70	n/a	n/a	$10.81	$10.81
2	Preordering	$2.02	n/a	n/a	n/a	n/a	n/a
3	Record Order	$1.19	$0.85	n/a	n/a	n/a	n/a
4	NMC Shared/Fixed Costs	$4.47	$4.47	n/a	n/a	n/a	n/a
5	OSS - Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
6	Total	$42.36	$30.02	n/a	n/a	$10.81	$10.81

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Rate Development
Inter-office Dedicated Transport

Ln	Description	Ordering		Service Connection - Per Order			
		100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-7	D=FWS-11	E=FWS-11	F=SUM (C..E)
	Advanced						
	Basic						
	DS0 and Fractional T-1						
	Initial						
1	New	$62.75	$46.29	$185.64	$99.43	n/a	$285.07
2	Disconnect	$43.87	$27.41	$112.57	$30.83	n/a	$143.40
3	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
4	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
5	Total	$111.00	$76.44	$298.21	$130.26	n/a	$428.47
	Subsequent						
6	Change	$45.22	$28.76	$108.72	$10.86	n/a	$119.58
7	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
8	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
9	Total	$49.60	$31.50	$108.72	$10.86	n/a	$119.58
	Advanced						
	Complex						
	DS1 and Higher						
	Initial						
10	New	$73.64	$57.18	$330.11	$101.60	n/a	$431.71
11	Disconnect	$45.51	$29.05	$112.93	$55.14	n/a	$168.07
12	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
13	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
14	Total	$123.53	$88.97	$443.04	$156.75	n/a	$599.79
	Subsequent						
15	Change	$45.22	$28.76	$109.08	$10.86	n/a	$119.94
16	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
17	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
18	Total	$49.60	$31.50	$109.08	$10.86	n/a	$119.94

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Rate Development
CLEC Dedicated Transport

| Ln | Description | Ordering | | Service Connection - Per Order | | | |
		100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-8	D=FWS-11	E=FWS-11	F=SUM (C..E)
	Dedicated Transport						
	DS0 and Fractional T1						
	Initial						
1	New	$62.75	$46.29	$168.49	$99.43	$121.94	$389.86
2	Disconnect	$43.87	$27.41	$112.57	$30.83	$25.55	$168.95
3	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
4	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
5	**Total**	$111.00	$76.44	$281.06	$130.26	$147.49	$558.81
	Subsequent						
6	Change	$45.22	$28.76	$108.72	$10.86	$11.21	$130.78
7	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
8	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
9	**Total**	$49.60	$31.50	$108.72	$10.86	$11.21	$130.78
	DS1 and Higher						
	Initial						
10	New	$73.64	$57.18	$330.11	$101.60	$107.14	$538.86
11	Disconnect	$45.51	$29.05	$112.93	$55.14	$52.90	$220.97
12	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
13	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
14	**Total**	$123.53	$88.97	$443.04	$156.75	$160.04	$759.83
	Subsequent						
15	Change	$45.22	$28.76	$109.08	$10.86	$11.21	$131.14
16	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
17	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
18	**Total**	$49.60	$31.50	$109.08	$10.86	$11.21	$131.14

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Wholesale Non-recurring Study
Rate Development
Signaling System 7 (SS7)

| Ln | Description | Ordering | | Service Connection - Per Order | | | |
		100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-8	D=FWS-12	E=FWS-12	F=SUM (C E)
	Signaling System Seven (SS7)						
	Facilities and Trunks						
	Initial						
1	New	$196.30	$179.84	$502.54	$116.80	n/a	$619 34
2	Disconnect	$96.96	$80.50	$344.01	$54.71	n/a	$398.72
3	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
4	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
5	**Total**	**$297.64**	**$263.08**	**$846.55**	**$171.51**	**n/a**	**$1,018.06**
	Subsequent (w/Engineering Review)						
6	Change	$79.90	$63.44	$418.63	$10.86	n/a	$429.49
7	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
8	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
9	**Total**	**$84.28**	**$66.18**	**$418.63**	**$10.86**	**n/a**	**$429.49**
	Subsequent (w/out Engineering Review)						
10	Change	$79.90	$63.44	$124.44	$10.86	n/a	$135.30
11	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
12	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
13	**Total**	**$84.28**	**$66.18**	**$124.44**	**$10.86**	**n/a**	**$135.30**

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Rate Development
Signaling System 7 (SS7)

Ln	Description	Ordering		Service Connection - Per Order			
		100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-8	D=FWS-12	E=FWS-12	F=SUM (C..E)
	Signaling System Seven (SS7)						
	Trunks Only						
	Initial						
14	New	$95.28	$78.82	$416.13	$116.80	n/a	$532.93
15	Disconnect	$52.49	$36.03	$309.67	$54.71	n/a	$364.38
16	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
17	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
18	**Total**	**$152.15**	**$117.59**	**$725.80**	**$171.51**	n/a	**$897.31**
	Subsequent (w/Engineering Review)						
19	Change	$50.89	$34.43	$399.05	$10.86	n/a	$409.91
20	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
21	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
22	**Total**	**$55.27**	**$37.17**	**$399.05**	**$10.86**	n/a	**$409.91**
	Subsequent (w/o Engineering Review)						
23	Change	$50.89	$34.43	$124.44	$10.86	n/a	$135.30
24	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
25	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
26	**Total**	**$55.27**	**$37.17**	**$124.44**	**$10.86**	n/a	**$135.30**
	STP Ports (SS7 Links)						
27	New	$196.30	$179.84	$416.13	$67.74	n/a	$483.87
28	Disconnect	$96.96	$80.50	$311.81	$23.45	n/a	$335.26
29	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
30	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
31	**Total**	**$297.64**	**$263.08**	**$727.94**	**$91.18**	n/a	**$819.12**

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Enhanced Extended Links (EELs)

Ln	Description	Ordering		Service Connection - Per Order			
		100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-9	D=FWS-13	E=FWS-13	F=SUM (C E)
	Enhanced Extended Links (EELs)						
	Advanced						
	Basic (Loop)						
	Initial						
1	New	$62.75	$46.29	$185.64	$14.33	$196.52	$396.49
2	Disconnect	$43.87	$27.41	$112.57	$14.33	$89.24	$216.14
3	Record Order	$4.38	$4.38	n/a	n/a	n/a	n/a
4	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
5	Total	$111.00	$78.08	$298.21	$28.66	$285.76	$612.63
	Subsequent						
6	Change	$45.22	$28.76	$108.72	$10.86	n/a	$119.58
7	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
8	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
9	Total	$49.60	$31.50	$108.72	$10.86	n/a	$119.58
	Changeover (As Is)						
10	Migration As Is	$116.46	$83.54	$33.74	n/a	n/a	$33.74
11	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
12	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
13	Total	$120.84	$86.28	$33.74	n/a	n/a	$33.74

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Enhanced Extended Links (EELs)

Ln	Description	Ordering		Service Connection - Per Order			
		100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-9	D=FWS-13	E=FWS-13	F=SUM (C..E)
	Enhanced Extended Links (EELs)						
	Advanced						
	Complex - DS0						
	Initial						
14	New	$62.75	$46.29	$185.64	$13.89	$134.15	$333.68
15	Disconnect	$43.87	$27.41	$112.57	$31.26	$51.67	$195.50
16	Record Order	$4.38	$4.38	n/a	n/a	n/a	n/a
17	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
18	**Total**	**$111.00**	**$78.08**	$298.21	$45.15	$185.82	**$529.18**
	Subsequent						
19	Change	$45.22	$28.76	$108.72	$10.86	n/a	$119.58
20	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
21	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
22	**Total**	**$49.60**	**$31.50**	$108.72	$10.86	n/a	**$119.58**
	Changeover (As Is)						
23	Migration As Is	$116.46	$83.54	$33.74	n/a	n/a	$33.74
24	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
25	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
26	**Total**	**$120.84**	**$86.28**	$33.74	n/a	n/a	$33.74

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Rate Development
Enhanced Extended Links (EELs)

Ln	Description	Ordering		Service Connection - Per Order			
		100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total
		A=Source	B=Source	C=PRO-9	D=FWS-13	E=FWS-13	F=SUM (C..E)
	Enhanced Extended Links (EELs)						
	Advanced						
	Complex - DS1/DS3						
	Initial						
27	New	$73.64	$57.18	$219.11	$191.92	$117.22	$528.25
28	Disconnect	$45.51	$29.05	$112.93	$52.54	$76 42	$241.89
29	Record Order	$4.38	$4.38	n/a	n/a	n/a	n/a
30	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
31	Total	$123.53	$90.61	$332.04	$244.46	$193.64	$770.14
	Subsequent						
32	Change	$45.22	$28.76	$109.08	$10.86	n/a	$119.94
33	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
34	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
35	Total	$49.60	$31.50	$109.08	$10.86	n/a	$119.94
	Changeover (As Is)						
36	Migration As Is	$128.99	$96.07	$33.74	n/a	n/a	$33.74
37	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
38	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
39	Total	$133.37	$98.81	$33.74	n/a	n/a	$33.74
	Multiplexing						
40	DS-1 to Voice	n/a	n/a	n/a	$139.38	$0.00	$139.38
41	DS-3 to DS-1	n/a	n/a	n/a	$170.64	$0.00	$170.64

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Dark Fiber

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Ln	Description	Ordering 100% Manual	Ordering Semi- Mech.	Service Connection - Per Order Provis.	Service Connection - Per Order CO Work	Service Connection - Per Order Field Install.	Service Connection - Per Order Total
		A=Source	B=Source	C=PRO-10	D=FWS-14	E=FWS-14	F=Sum (C. E)
	Advanced						
	Dark Fiber						
	Preordering						
1	Exchange Facilities	$3.15	$3 15	$206 76	n/a	n/a	$206 76
2	Record Order	$4.38	$2 74	n/a	n/a	n/a	n/a
3	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
4	**Total**	**$7.53**	**$5.89**	**$206.76**	n/a	n/a	**$206.76**
5	Inter-office Facilities	$3.15	$3.15	$402.77	n/a	n/a	$402 77
6	Record Order	$4.38	$2 74	n/a	n/a	n/a	n/a
7	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
8	**Total**	**$7.53**	**$5.89**	**$402.77**	n/a	n/a	**$402.77**
	UNE Inter-office Dedicated Transport						
9	New	$55 50	$55 50	$64 15	$35.02	n/a	$99 17
10	Disconnect	$28 30	$28 30	$64 15	$35 02	n/a	$99 17
11	Record Order	$4 38	$2 74	n/a	n/a	n/a	n/a
12	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
13	**Total**	**$88.18**	**$86.54**	**$128.30**	**$70.04**	n/a	**$198.34**
	Unbundled Loop						
14	New	$55.50	$55.50	$64 15	$15.38	$18 67	$98.20
15	Disconnect	$28.30	$28.30	$64.15	$15 38	$18.67	$98.20
16	Record Order	$4.38	$2 74	n/a	n/a	n/a	n/a
17	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
18	**Total**	**$88.18**	**$86.54**	**$128.30**	**$30.76**	**$37.34**	**$196.40**
	Subloop Feeder						
19	New	$55.50	$55 50	$64.15	$15 38	$18.67	$98.20
20	Disconnect	$28.30	$28 30	$64.15	$15 38	$18 67	$98.20
21	Record Order	$4.38	$2.74	n/a	n/a	n/a	n/a
22	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
23	**Total**	**$88.18**	**$86.54**	**$128.30**	**$30.76**	**$37.34**	**$196.40**
	Subloop Distribution						
24	New	$55 50	$55 50	$64 15	n/a	$37 34	$101.49
25	Disconnect	$28 30	$28.30	$64 15	n/a	$37 34	$101.49
26	Record Order	$4.38	$2 74	n/a	n/a	n/a	n/a
27	OSS - Access Transaction Specific Costs	tbd	tbd	n/a	n/a	n/a	n/a
28	**Total**	**$88.18**	**$86.54**	**$128.30**	n/a	**$74.68**	**$202.98**

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Coordinated Conversions

Ln	Description	Ordering 100% Manual	Ordering Semi-Mech.	Service Connection - Per Order Provis.	Service Connection - Per Order CO Work	Service Connection - Per Order Field Install.	Service Connection - Per Order Total	Coordinated Conversions 100% Manual	Coordinated Conversions Semi-Mech.
		A=Source	B=Source	C=PRO-5	D=FWS-8	E=FWS-8	F=SUM (C E)	G=A+F	H=B+F
	Coordinated Conversions								
	Exchange								
	Standard Interval								
1	Process 1	$2.45	$2.45	$2.96	n/a	n/a	$2.96		
2	Process 2	n/a	n/a	$8.87	$7.24	n/a	$16.11		
3	Process 3	n/a	n/a	n/a	$3.62	$11.21	$14.83		
4	Total	$2.45	$2.45	$11.83	$10.86	$11.21	$33.89	$36.34	$36.34
	Additional Interval								
5	Process 2	n/a	n/a	$8.87	$10.86	n/a	$19.73		
6	Process 3	n/a	n/a	n/a	n/a	$11.21	$11.21		
7	Total	n/a	n/a	$8.87	$10.86	$11.21	$30.94	$30.94	$30.94
	Advanced								
	Standard Interval								
8	Process 1	$2.45	$2.45	$2.96	n/a	n/a	$2.96		
9	Process 2	n/a	n/a	$8.87	$7.24	n/a	$16.11		
10	Process 3	n/a	n/a	n/a	$3.62	$11.21	$14.83		
11	Total	$2.45	$2.45	$11.83	$10.86	$11.21	$33.89	$36.34	$36.34
	Additional Interval								
12	Process 2	n/a	n/a	$8.87	$10.86	n/a	$19.73		
13	Process 3	n/a	n/a	n/a	n/a	$11.21	$11.21		
14	Total	n/a	n/a	$8.87	$10.86	$11.21	$30.94	$30.94	$30.94

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Hot Cut Coordinated Conversions

Ln	Description	Ordering 100% Manual	Semi-Mech.	Service Connection - Per Order Provis.	CO Work	Field Install.	Total	Hot Cut Coordinated Conversions 100% Manual	Semi-Mech.
		A=Source	B=Source	C=PRO-5	D=FWS-9	E=FWS-9	F=Sum (C..E	G=A+F	H=B+F
	Hot Cut Coordinated Conversions								
	Exchange								
	Standard Interval								
1	Process 1	$2.45	$2.45	$2.96	n/a	n/a	$2.96		
2	Process 2	n/a	n/a	$35.49	$28.95	n/a	$64.44		
3	Process 3	n/a	n/a	n/a	$14.47	$44.83	$59.30		
4	**Total**	$2.45	$2.45	$38.45	$43.42	$44.83	$126.70	$129.15	$129.15
	Additional Interval								
5	Process 2	n/a	n/a	$8.87	$10.86	n/a	$19.73		
6	Process 3	n/a	n/a	n/a	n/a	$11.21	$11.21		
7	**Total**	n/a	n/a	$8.87	$10.86	$11.21	$30.94	$30.94	$30.94
	Advanced								
	Standard Interval								
8	Process 1	$2.45	$2.45	$2.96	n/a	n/a	$2.96		
9	Process 2	n/a	n/a	$35.49	$28.95	n/a	$64.44		
10	Process 3	n/a	n/a	n/a	$14.47	$44.83	$59.30		
11	**Total**	$2.45	$2.45	$38.45	$43.42	$44.83	$126.70	$129.15	$129.15
	Additional Interval								
12	Process 2	n/a	n/a	$8.87	$10.86	n/a	$19.73		
13	Process 3	n/a	n/a	n/a	n/a	$11.21	$11.21		
14	**Total**	n/a	n/a	$8.87	$10.86	$11.21	$30.94	$30.94	$30.94

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Wholesale Non-recurring Study
Rate Development
Expedites and Other Charges

Description	Ordering		Service Connection - Per Order				Expedites and Other Charges	
	100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total	100% Manual	Semi-Mech.
	A=Source	B=Source	C=PRO-6	D=FWS-10	E=FWS-10	F=Sum (C. E)	G=A+F	H=B+F
Expedites								
UNE Loop/Port								
Exchange Services	$4.57	$4.57	n/a	n/a	n/a	n/a	$4.57	$4.57
Advanced/Special Services	$4.57	$4.57	$31.02	n/a	n/a	$31 02	$35.59	$35.59
Other Charges								
Customer Service Record Search (per account)	$5.73	n/a	n/a	n/a	n/a	n/a	$5.73	n/a
CLEC Account Establishment (per CLEC)	$226.38	$226.38	n/a	n/a	n/a	n/a	$226.38	$226.38
No Access Customer Will Advise	$22.05	$22.05	n/a	n/a	$56.04	$56.04	$78.09	$78.09

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Rate Development
Ordering Factors

		Ordering	
		100%	Semi-
Ln	Description	Manual	Mech.
		A=Source	B=Source
	Order Weighting		
	Preordering		
1	Preordering	$4.04	n/a
2	Occurrence Rate	50%	n/a
3	**Weighted Preordering**	$2.02	n/a
	UNE Loop/Port		
4	Record Order	$11.93	$8.51
5	Occurrence Rate	10%	10%
6	**Weighted Record Order**	$1.19	$0.85
	UNE Combinations (Loop/Port) Only		
7	Record Order	$9.62	$6.20
8	Occurrence Rate	10%	10%
9	**Weighted Record Order**	$0.96	$0.62
	Network Wholesale Elements		
10	Record Order	$43.83	$27.37
11	Occurrence Rate	10%	10%
12	**Weighted Record Order**	$4.38	$2.74

Note 1: Weighting Factors provided by Product Management.

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Fixed Costs

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Ln	Description	Total Cost	National Total Cost	Unit Volume	Cost Per LSR
		A=Source	B=Source	C=Source	D=Source
	Ordering				
1	NMC Shared/Fixed Costs	$18,648,430			
	OSS				
2	Local Wholesale Transaction Specific Costs		tbd		
3	Access Transaction Specific Costs		tbd		
	Transition Costs				
4	TDB (separate proceeding)		tbd		
5	TDB (separate proceeding)		tbd		
6	TDB (separate proceeding)		tbd		
7	TDB (separate proceeding)		tbd		
8	TDB (separate proceeding)		tbd		
	Order Volumes				
9	Local Wholesale Order Volume - 5-Year Total			20,848,804	
10	Local Wholesale Order Volume - Annual Average			4,169,761	
11	Access Order Volume - 5-Year Total			tbd	
12	Access Order Volume - Annual Average			tbd	
13	NMC Shared/Fixed Costs (Ln 1/Ln 10)				$4.47
14	OSS - Local Wholesale Transaction Specific Costs				tbd
15	OSS - Access Transaction Specific Costs				tbd
16	OSS - Transition Costs				tbd
	Line Sharing				
17	Line Sharing Unit Volume - 3-Year Forecasted Total			2,005,062	
18	MLPQ 2000 Incurred Transition Costs	$1,014,098			
19	Mechanized Loop Pre-Qualification (Ln 18/Ln 17)				$0.51

Note 1: OSS costs are not included in rate element development at this time. Florida OSS costs will be addressed i