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March 19, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 990649B-TL

Dear Ms. Bayo:

On behalf of the Z-Tel Communications, Inc., enclosed for filing and distribution are the original and 15 copies of Z-Tel Communications, Inc.'s Motion for Leave to Submit Supplemental Testimony.

The testimony that is the subject of the motion was filed on March 18, 2002, but the motion was delayed by a day. For convenience, I have appended the testimony to the attached motion. I regret any inconvenience this may have caused.

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,



Joseph A. McGlothlin

JAM/mls
Enclosure
cc: Parties of Record

DOCUMENT NUMBER-DATE

03182 MAR 19 02

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

FPSC-DCI-MISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
pricing of unbundled)
elements (Sprint/Verizon track))

DOCKET NO. 990649B-TP
Filed: March 19, 2002

**Z-TEL COMMUNICATIONS, INC.'S MOTION FOR LEAVE
TO SUBMIT SUPPLEMENTAL TESTIMONY**

Z-Tel Communications, Inc. ("Z-Tel"), through its undersigned counsel, seeks leave to submit the Supplemental Rebuttal Testimony of Dr. George S. Ford, and in support states:

1. On January 30, 2002 Z-Tel submitted the Revised Rebuttal Testimony of Dr. George S. Ford. Dr. Ford sponsored an exhibit in which he displayed the results of a comparison of the UNE costs of Verizon and BellSouth, as measured by the FCC's HCPM cost model, and the corresponding relationship of BellSouth's UNE rates and the rates proposed by Verizon in this docket.

2. As he stated in his testimony, Dr. Ford obtained the HCPM outputs from publicly available output reports on the FCC website. Dr. Ford has been apprised that, since he prepared his testimony, the FCC has made available more recent measurements of the UNE costs.

3. The purpose of the supplemental testimony is to provide to the Commission the impact of the most recent HCPM data on the relationships that Dr. Ford described in his Revised Rebuttal testimony. However, Z-Tel notes that the use of the information results in no material change to Dr. Ford's earlier testimony.

4. Z-Tel submits that the supplemental testimony and exhibit is of the type and nature that could be sponsored from the witness stand. By distributing the supplemental testimony and exhibit now,¹ Z-Tel wishes to provide parties an ample opportunity to review the exhibit prior to hearing.

WHEREFORE, Z-Tel requests the Commission to grant leave to submit the Supplemental Testimony of Dr. George S. ford, and the single exhibit attached hereto.


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Attorneys for Z-Tel Communications, Inc.

¹ Z-Tel filed the supplemental testimony on March 18, 2002, subject to this Motion)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing
of unbundled network elements
(Sprint/Verizon track)

Docket No. 990649B-TP

RECEIVED-FPSC
02 MAR 18 PM 4:52
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SUPPLEMENTAL TESTIMONY OF

DR. GEORGE S. FORD

ON BEHALF OF Z-TEL COMMUNICATIONS, INC.

MARCH 18, 2002

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

1 **Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS**

2 A: My name is George S. Ford. My business address is 601 South Harbour Island
3 Boulevard, Suite 220, Tampa, Florida 33602.

4 **Q: HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?**

5 A: Yes. I filed Revised Rebuttal Testimony on January 30, 2002.

6 **Q: WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?**

7 A: In my Revised Rebuttal testimony, I described the use of the output of the FCC's HCPM
8 cost model to develop relationships between the costs that BellSouth and Verizon incur to
9 provide UNEs and the rates that correspond to those costs. During my deposition I was
10 apprised that the FCC recently made adjustments to its computation of loop and
11 switching costs within the context of this comparative analysis. I have updated my
12 calculations to mirror those the FCC employed in the 271 Orders beginning with the
13 Pennsylvania 271 Order. These computations are made using the most recent version of
14 HCPM output files. The purpose of this supplemental testimony is to sponsor Exhibit
15 ____ (GSF-12), which shows the results of the update. The exhibit is attached.

16 **Q: DOES THE RESULT OF APPLYING THE MOST RECENT CALCULATIONS
17 AND VINTAGE OF HCPM LEAD YOU TO ALTER YOUR CONCLUSIONS IN
18 ANYWAY?**

19 A: No. As the exhibit shows, the use of the updated calculations does not result in any
20 material changes to my earlier exhibit. In fact, the discrepancies that I described in my
21 earlier testimony are slightly more pronounced in the updated exhibit.

22 **Q: DOES THAT COMPLETE YOUR TESTIMONY?**

23 A: Yes.

HCPM Cost Estimates for BellSouth and Verizon

| | Verizon Florida | BellSouth Florida |
|----------------------|--------------------|----------------------|
| Loop | 13.40 | 13.89 |
| Switching | 3.24 | 3.52 |
| Minutes | | |
| End-Office Switching | 1,362 | 1868 |
| Direct Transport | 914 | 1302 |
| Common Transport | 150 | 158 |
| Tandem Switching | 84 | 94 |

Verizon Loop is 3.5% less than Bellsouth loop.

Verizon Switching is 8.1% less than BellSouth switching.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Dr. George S. Ford's Supplemental Testimony was on this 18th day of March 2002 been served (*) Hand Delivery and U.S. Mail to the following:

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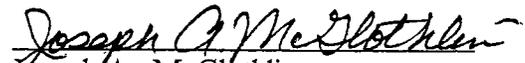
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Z-Tel Communications, Inc.'s Motion For Leave To Submit Supplemental Testimony has on this 19th day of March, 2002 been served (*) Hand Delivery, Email and U.S. Mail to the following:

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