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March 29, 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-TP

Dear Ms. Bayo:

On behalf of Z-Tel Communications, Inc., I am enclosing the original and 15 copies of the Z-Tel Communications, Inc.'s Response to Verizon Florida, Inc.'s Motion to Strike.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and pleading by returning the same. Thank you for your assistance in this matter.

Thank you for your assistance in this matter.

Yours truly,



Joseph A. McGlothlin

JAM/mls
Enclosure

DOCUMENT # 990649B-TP
03634 MAR 29 2002
FPSC-0011-00101-01000

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)	
pricing of unbundled)	Docket No. 990649B-TP
elements (Sprint/Verizon track))	Filed: March 29, 2002
_____)	

**Z-TEL COMMUNICATIONS, INC.'S RESPONSE TO
VERIZON FLORIDA, INC.'S MOTION TO STRIKE**

Z-Tel Communications, Inc. ("Z-Tel"), through its undersigned counsel, responds to Verizon Florida, Inc.'s ("Verizon") Motion to Strike Supplemental Testimony of George S. Ford, and states:

1. On January 30, 2002, Z-Tel filed the Revised Rebuttal Testimony of Dr. George S. Ford. In his testimony, Dr. Ford described his use of publicly available output reports of the FCC's Hybrid Proxy Cost Model ("HCPM") to develop a comparison of the relationship between the costs of Verizon and of BellSouth to provide UNEs to ALECs, on the one hand, and the corresponding relationship between the UNE rates currently in effect for BellSouth and the UNE rates proposed in this case by Verizon, on the other. Dr. Ford observed that the costs of providing UNEs are roughly the same for each carrier, but that Verizon's proposed rates are far higher — indeed, higher by an order of magnitude — than the current BellSouth rates. Dr. Ford concluded that Verizon's inexplicably higher proposed rates do not pass a "sanity test."

2. From time to time, the FCC adjusts the HCPM and the manner in which it performs certain measurements with the HCPM. During the March 1, 2002, deposition of Dr. Ford, through a series of questions counsel for Verizon apprised Dr. Ford that the FCC had made such adjustments since the time Dr. Ford had prepared his Revised Rebuttal Testimony.

3. On two separate occasions during the deposition, Dr. Ford and his counsel offered to provide an updated version of the exhibit to Dr. Ford's testimony reflecting the impact of the use

of the updated FCC calculation. See Attachment A. On both occasions counsel for Verizon declined Z-Tel's offer to provide an update. It became apparent to Z-Tel that Verizon's objective was to attempt to discredit Dr. Ford's analysis without regard to the materiality — or lack thereof — of the effects of the FCC's adjustments on Dr. Ford's analysis and conclusions.

4. Subsequent to the deposition, Dr. Ford obtained the FCC's adjustments, performed a new iteration of his analysis using the updated material, and observed that the effect of the use of the updated information was immaterial to the results of his earlier analysis. In fact, use of the updated information had the effect of increasing the already extreme disparity between BellSouth's rates and Verizon's proposed rates.

5. To be clear, Dr. Ford did not undertake the update because of any concern that the originally filed calculations were "incorrect." To the contrary, the calculations employed in Dr. Ford's original analysis were used by the FCC in earlier 271 proceedings. The updated calculations were provided based on the desire to provide complete information based on the latest vintage of the calculations, and to quantify the extent of any differences occasioned by the FCC update to which Verizon referred.

6. On March 19, 2002, Z-Tel filed a motion for leave to submit the supplemental testimony of Dr. Ford.¹ The limited purpose of the supplemental testimony is to provide the results of Dr. Ford's analysis after employing the FCC's updated adjustments. The output files used by Dr. Ford in preparing the calculations in his Revised Rebuttal Testimony turned out to be the latest vintage of the HCPM output files, so no changes to the data upon which the calculations were

¹ As explained in the motion, the supplemental testimony was submitted on March 18, 2002, but the filing of the motion was delayed by a day.

performed were required. The FCC's update made only slight changes to how the FCC now applies the data. Dr. Ford's supplemental testimony reports the outcome of his analysis after applying those changes.

7. In his supplemental testimony, Dr. Ford acknowledges that he learned of the FCC's adjustments during his deposition. He also reports that the effect of the update is immaterial to his analysis. *Clearly, the latter observation is the information that Verizon hopes to keep from the Commission through its motion to strike.*

8. Z-Tel acknowledges that it is in the discretion of the Commission to allow or disallow supplemental testimony. Z-Tel respectfully points out that the practice of the Commission, even when prefiled testimony is used, is to allow witnesses to provide "corrections, changes, or additions" to their testimony when they take the stand. Z-Tel submits that the appropriate standards to apply when testimony of the nature of Z-Tel's update is proffered is whether the information is useful to the Commission, and whether the parties would be prejudiced by the use of updated information. In this instance, Z-Tel's very limited supplemental testimony has been provided to parties well in advance of the evidentiary hearing. Inasmuch as the premise and methodology of Dr. Ford's earlier testimony have not been changed, and Dr. Ford's only modification was to use calculations which Verizon contends is the proper information for his purpose, Z-Tel submits that Verizon will not be prejudiced by the supplemental testimony. If Verizon indicates that it needs to provide additional testimony directed (solely) to Dr. Ford's supplemental testimony, Z-Tel has no objection.

9. For ease of reference, a copy of Z-Tel's Motion for Leave to Submit Supplemental Testimony (with attached copy of the Supplemental Testimony of Dr. Ford) is attached to this motion. See Attachment B.

10. For the reasons stated above, Verizon's Motion to Strike Supplemental Rebuttal Testimony of George S. Ford should be denied, and Z-Tel's Motion for Leave to Submit Supplemental Testimony should be granted.



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ATTACHMENT A

1 Q. Have you ever reviewed the various changes
2 that the Commission has made to the model since you
3 initially performed the calculations 10 or 12
4 months ago?

5 A. No.

6 Q. Are you aware that the Commission has made
7 changes to the Synthesis model which have effected
8 the cost estimates produced by the model in the
9 last 12 months?

10 A. They list some changes in this document,
11 yes. It looks like this year, June, July, August,
12 December.

13 Q. And separate and apart from what's set
14 forth in this document, Exhibit 3, were you aware
15 that the Commission was making changes to the model
16 that effected the cost estimates that have been
17 produced?

18 A. I think I had an older version at one time
19 and then updated it. I don't think the rates that
20 I'm producing now are the first set I produced
21 which may have happened -- I don't know when that
22 might have happened. I don't recall updating the
23 model say within the last 10 months, but I'll have
24 to check that to make sure.

25 If there are new updates -- the time I

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Attachment A
Page 1 of 5

1 evaluated it there weren't significant changes in
2 the rates. I think there was a problem with
3 California's file at one time, and I think that has
4 been resolved.

5 The calculations can be rerun with my
6 spreadsheets within minutes. So if there's a new
7 version, then I can provide the new estimates
8 without any difficulties.

9 Q. Were you aware that on December 18 of 2001
10 the Commission released the version of the model
11 that would be used for estimating universal service
12 funding requirements?

13 A. I was not aware of it. It's in this
14 document that you provided.

15 Q. Are you aware that the Commission made
16 changes to the demand or, in other words, the line
17 counts as well as usage data in the model?

18 A. I believe it's been updated today, the
19 latest information they have.

20 Q. But the model that you've sponsored here
21 doesn't contain any of that updated data, correct?

22 A. It's certainly not contained in the
23 December data because I can remember that far
24 back. If you would like me to file a late-filed
25 exhibit I will.

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Attachment A
Page 2 of 5

1 Q. No. I'm just curious to know whether you
2 considered these issues.

3 With respect to the Synthesis model's
4 inputs, do you know what vintage the inputs used in
5 the Synthesis model as you filed it or you used it
6 for purposes of this proceedings are?

7 A. It's the same vintage used for the
8 Massachusetts 271 order, whatever that vintage is.

9 Q. Do you understand that the outside plant
10 investment inputs were from 1997?

11 A. I'm trying to think if it was '97 or not.
12 I think there is some '96 data even in the model.

13 Q. Do you know if the switching investments
14 were based on 1999 investments?

15 A. I don't know that, no.

16 Q. Do you know if the expense factors used in
17 the Synthesis models were from 1998 vintage?

18 A. No.

19 Q. Is it your view as an analyst of cost
20 models that it is methodologically appropriate to
21 use data of mixed vintages to establish
22 forward-looking costs?

23 A. I don't have a problem with that in
24 general, no.

25 Q. Do you think it's methodologically

1 bottom. It says Ford's worksheets for Verizon
2 Florida testimony, and there's three files you can
3 download, which include all the work papers for the
4 cost of capital, testimony, all the work papers for
5 the HCPM analysis, and some other documents that
6 were requested by the Commission unrelated to the
7 testimony.

8 BY MR. HUTHER:

9 Q. The starting point for your analysis here
10 was the output reports that are contained in the
11 work papers that you have just referenced, correct?

12 A. Yes. I have not run the HCPM model ever.
13 It is not even on my computer. I've never
14 downloaded it to my knowledge. I don't think it's
15 necessarily easy to run. So I haven't tried, but
16 the purpose was is to get the output files and to
17 replicate the computations made by the FCC in its
18 271 orders. That's in essence what I've done.

19 Q. Now, why is it that you did not consult
20 the FCC's Web page to run your numbers with the
21 version of the model released on December 18, 2001
22 for purposes of the analysis you're offering here?

23 A. I was unaware that they had updated the
24 output files. I will certainly do that now that I
25 have that information and make all the computations

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Attachment A
Page 4 of 5

1 again and make those available to all the parties.

2 Q. Let me show you --

3 MR. MCGLOTHLIN: Would you like that as
4 an identified exhibit?

5 MR. HUTHER: No thanks.

6 BY MR. HUTHER:

7 Q. -- a document dated -- release date
8 September 19, 2001. It's in FCC Docket No.
9 01-138. I believe, Dr. Ford, that is the 271 order
10 for Verizon Pennsylvania --

11 A. Yes.

12 Q. -- that you identified. Could you please
13 turn to Page 37 of that document, which I believe
14 should be marked as deposition Exhibit 7.

15 (Exhibit No. 7 was marked for
16 identification.)

17 BY MR. HUTHER:

18 Q. On Page 37, Dr. Ford, in Footnote 249,
19 second paragraph, you'll see the text "in making
20 this analysis we make a number of adjustments to
21 the USF cost model."

22 A. Mmm-hmm.

23 Q. The USF cost model they're referring to
24 there is the Synthesis model?

25 A. Mmm-hmm.

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Attachment A
Page 5 of 5

ATTACHMENT B

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:

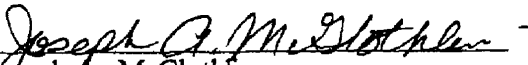
1. On January 30, 2002 Z-Tel submitted the Revised Rebuttal Testimony of Dr. George S. Ford. Dr. Ford sponsored an exhibit in which he displayed the results of a comparison of the UNE costs of Verizon and BellSouth, as measured by the FCC's HCPM cost model, and the corresponding relationship of BellSouth's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

SUPPLEMENTAL TESTIMONY OF

DR. GEORGE S. FORD

ON BEHALF OF Z-TEL COMMUNICATIONS, INC.

MARCH 18, 2002

RECEIVED & FILED

Michael
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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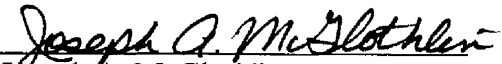
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