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June 27, 2003

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Verizon Florida Inc.'s Motion to Compel Discovery for filing in the above matter. A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Catherine Kane Ronis
for Catherine Kane Ronis

cc: All Parties of Record
Charles Schubart

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail this 27th day of June, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

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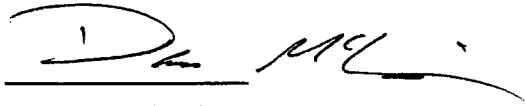
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Daniel McCuaig

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for)
Commission action to support local)
Competition in BellSouth Telecommunications) Docket No. 981834-TP
Inc.'s service territory)
_____)

In re: Petition of ACI Corp. d/b/a Accelerated)
Connections, Inc. for generic investigation to)
ensure that BellSouth Telecommunications,)
Inc., Sprint-Florida, Incorporated, and GTE) Docket No. 990321-TP
Florida Incorporated comply with obligation to)
provide alternative local exchange carriers)
with flexible, timely, and cost-efficient physical)
collocation.)
_____)

VERIZON FLORIDA INC.'S MOTION TO COMPEL DISCOVERY

Pursuant to Rules 28-106.204 and 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.380 of the Florida Rules of Civil Procedure, Verizon Florida Inc. ("Verizon"), by and through its undersigned counsel, hereby submits this Motion to Compel Discovery requesting the Florida Public Service Commission ("Commission") to order AT&T Communications of the Southern States, LLC, ("AT&T") to respond to Verizon's Second Set of Interrogatories ("Second Set"). Pursuant to Rule 28-106.204(3), Verizon has conferred with AT&T regarding this motion: AT&T reiterated its objections to Verizon's Second Set and continues to refuse to provide the requested discovery.

On May 8, 2003, Verizon served AT&T with its Second Set. On May 28, 2003, AT&T interposed identical relevancy objections to each interrogatory and provided *no* responsive information at all. As this Commission has recognized, discovery is proper

and may be compelled if it is not privileged and is or likely will lead to relevant and admissible information:

The test for determining whether discovery is appropriate is set forth in Rule 1.280(b)(1) of the Florida Rules of Civil Procedure which provides that "parties may obtain discovery regarding any matter, not privileged, that is relevant for the subject matter of the pending action . . . It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence." Section 90.401 of the Florida Evidence Code defines "relevance" as evidence tending to prove or disprove a material fact.

Order No. PSC-93-0652-PCO-WS, *In Re Jasmine Lakes Utilities Corporation*, Docket No. 920148-WS, dated April 28, 1993.

For the reasons stated below, Verizon's discovery requests are both relevant and likely to lead to the discovery of additional relevant and admissible information. Indeed, the information requested is integral to Verizon's preparation of its surrebuttal testimony on pricing issues, which is due to be filed on September 23, 2003. AT&T's refusals to answer are thus improper, and therefore Verizon respectfully submits this motion to compel AT&T to provide immediately full and complete responses, without objection, to each interrogatory in Verizon's Second Set.

INTERROGATORY NOS. 5-21

Verizon's Second Set contains 17 interrogatories, many with subparts, covering a broad range questions about AT&T's collocation activity, provisioning of telecommunications services, and general business practices. To each interrogatory, regardless of the information requested, AT&T responded with the same statement:

AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

See Exhibit A.

AT&T thus argues that its own operational experience is not relevant to the issue of Verizon's forward-looking economic costs of providing collocation. This objection is inappropriate and without merit. The rebuttal testimony of AT&T witness Steven E. Turner purports to offer the collocation costs that an efficient, forward-looking ILEC would expect to incur to provision collocation, at times relying on AT&T's experience as a telecommunications provider to set benchmarks for the ILECs to match. *See, e.g.*, Turner Rebuttal at 29 ("In reality, based on the rectifiers used in AT&T's network which are similar to those used in incumbent networks, the efficiency of rectifiers is at least 90 percent.").¹

¹ AT&T further relies on its operations and experience in attacking Verizon's power costs in the surrebuttal testimony of Mr. King. *See, e.g.*, King Surrebuttal at 8 ("The AT&T standard for fuse sizing is to multiply the total manufacturer's published List 2 drain times 125-140% and provide that size fuse for both feeds."). Verizon has moved to strike this testimony for other reasons. *See* Joint Motion of Verizon Florida Inc. and Sprint-Florida, Incorporated to Strike the

AT&T itself has thus put its operations into play in this proceeding, and should not be permitted to trumpet its experience providing telecommunications services when it would be to its advantage to do so, but at the same time to hide that same experience when it would serve to undercut the standards to which it proposes that “efficient” firms be held. Surely, for example, the investment, installation, and labor costs associated with AT&T’s rectifiers are just as relevant in determining appropriate ILEC power investments as is their vaunted efficiency, yet AT&T has refused to provide just that discovery. See AT&T Responses to Verizon Interrogatory Nos. 11(c)-(f), 12(c)-(f), 13(c)-(f), 14(c)-(f).

Interrogatory Nos. 5 & 6:

Verizon’s fifth and sixth interrogatories to AT&T seek information regarding AT&T’s Florida-specific collocation practices. This information will support Verizon’s assertions regarding ALEC requirements for providing telecommunications services in the collocation context (e.g., minimum DC power requirements).

Interrogatory Nos. 7-10:

Verizon’s seventh through tenth interrogatories to AT&T seek information regarding AT&T’s Florida-specific collocation *provisioning* practices. This information will support various cost components and rate elements of Verizon’s EIS Cost Study, which AT&T has challenged.

Interrogatory Nos. 11-14:

Verizon's eleventh through fourteenth interrogatories to AT&T seek information regarding AT&T's power costs and practices. This information will support Verizon's proposed power costs, which AT&T has challenged. In addition, AT&T's power costs and practices have been placed in issue by AT&T itself. *See, e.g.*, Turner Rebuttal at 29 (asserting the relevance of rectifier efficiency in AT&T's network). Finally, Verizon obtained similar information from AT&T in a collocation proceeding in New York, which confirmed the reasonableness of Verizon's proposed power costs and seriously undermined the credibility of AT&T's attacks on those costs.

Interrogatory No. 15:

Verizon's fifteenth interrogatory to AT&T seeks information regarding AT&T's cable racking practices. This information will rebut AT&T's assertion that BellSouth (and, by implication, Verizon) has understated cable racking capacity. *See* Turner Rebuttal at 49-50.

Interrogatory Nos. 16-20:

Verizon's sixteenth through twentieth interrogatories to AT&T seek information regarding AT&T's depreciation lives, rates, and methods. Verizon has proposed depreciation lives that it believes are the best indicator of forward-looking depreciation expenses. In determining what depreciation lives are most appropriate for a forward-looking collocation study to assume, comparisons to depreciation lives used by other telecommunications carriers are useful. The information will likely support Verizon's proposed depreciation lives, rates, and methods, as similarities between AT&T's and Verizon's depreciation lives will confirm the reasonableness of Verizon's proposals.

Interrogatory No. 21:

Verizon's twenty-first interrogatory to AT&T seeks information regarding AT&T's cost of capital. Verizon has proposed a cost of capital that it believes to be, although conservative, an accurate indicator of the expenses and risk Verizon faces going forward. In determining what cost of capital is appropriate to assume in a forward-looking collocation study, comparisons to cost of capital assumptions used by other telecommunications carriers are useful.

In addition, AT&T has indicated that if it had proposed a cost of capital, it would have been approximately 7%, but has not provided any support for that statement. In other proceedings, however, AT&T provided its own internal cost of capital estimate, which supported Verizon's proposed cost of capital. In fact, the FCC, in the Virginia UNE proceeding, asked AT&T on the record to produce the cost of capital it uses to evaluate local exchange investments. *See Transcript, Petition of WorldCom, Inc., et al., Pursuant to Section 252(e)(5) of the Communications Act for Expedited Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration*, CC Docket No. 00-218 (Federal Communications Commission, Oct. 24, 2002) at 3641-42.

* * * *

In short, AT&T has attempted to unilaterally and arbitrarily decide which parts of its operations are "relevant" to this proceeding and which are not. AT&T's reliance on its own operations and experience is flatly inconsistent with its objection to Verizon's Second Set that "[i]nformation related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in

establishing [Verizon's collocation rates]." Verizon must be allowed to examine AT&T's practices and cost structure to assess the accuracy of the cost structure AT&T seeks to impose on Verizon in Florida. AT&T's Florida-specific experience — sought by Verizon Interrogatory Nos. 5-10, 12, and 14 — is, of course, particularly relevant.

Accordingly, Verizon respectfully requests that AT&T be ordered to provide immediately full and complete responses, without objection, to each interrogatory in Verizon's Second Set. If this request is not granted, then the Commission should strike the portions of AT&T's testimony that rely on AT&T's own operations and experience provisioning telecommunications services, including Mr. Turner's revised rebuttal testimony and Mr. King's surrebuttal testimony (if it is not already deemed stricken per Verizon's Motion to Strike filed on June 25, 2003).

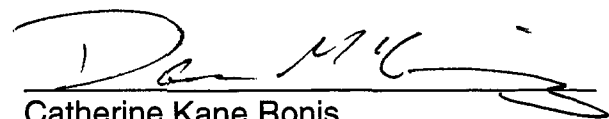
CONCLUSION

For the foregoing reasons, Verizon respectfully requests that the Commission grant this Motion to Compel Discovery in its entirety.

Respectfully submitted,

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Dated: June 27, 2003



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for)	
Commission action to support local competition)	Docket No. 981834-TP
in BellSouth Telecommunications, Inc.'s service)	
territory.)	
_____)	

Petition of ACI Corp. d/b/a Accelerated)	
Connections, Inc. for generic investigation to)	
ensure that BellSouth Telecommunications, Inc.,)	
Sprint-Florida, Incorporated, and GTE)	Docket No. 990321-TP
Florida Incorporated comply with obligation)	
provide alternative local exchange)	
carriers with flexible, timely, and cost-efficient)	
physical collocation)	
_____)	

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
RESPONSES TO VERIZON FLORIDA, INC.'S
SECOND SET OF INTEROGATORIES (NOS. 5-21)

AT&T Communications of the Southern States, LLC (hereinafter "AT&T") pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Responses to Verizon Florida, Inc.'s (hereinafter "Verizon") Second Set of Interrogatories to AT&T Communications of the Southern States, LLC.

Interrogatory No. 5: Please provide the following information with respect to each collocation arrangement AT&T currently has in a Florida central office.

- a. Address
- b. CLLI code
- c. ILEC
- d. Applicable tariff (Le., federal, state, interconnection agreement)
- e. Type of arrangement (i.e., caged, cageless, virtual, etc.)
- f. In-service date
- g. NRCs paid
- h. MRCs paid in 2002, in monthly detail

- i. Power ordered in amps, specifying fused or load
- j. Square footage occupied
- k. Cage size, if applicable (including cage height)
- l. Cage material, if applicable
- m. Number of relay racks occupied
- n. Number of DSOs
- o. Number of DSIs
- p. Number of DS3s
- q. Number and sizes of fiber cables
- r. Types and numbers of equipment pieces in arrangement

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 6: Please provide the following information with respect to each arrangement AT&T has in Florida to use non-ILEC telecommunications space (Le., in collocation hotels or other such properties):

- a. Property Owner
- b. Address
- c. Contract length
- d. Annual lease costs, in detail
- e. Type of arrangement (i.e., caged, cageless, virtual, etc.)
- f. In-service date
- g. Square footage occupied
- h. Up-front costs (i.e., the equivalent of NRCs) and their associated services and/or facilities
- i. Monthly costs and their associated services and/or facilities
- j. Annual costs and their associated services and/or facilities
- k. Any costs not identified in response to Interrogatory 6(h)-(j) and their associated services and/or facilities

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 7: Does AT&T own or control any buildings in Florida used to house telecommunications equipment?

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 8: If the answer to Interrogatory 7 is yes, please provide the following information with respect to such each property:

- a. Address
- b. In-service date
- c. Square footage

- d. Construction or purchase costs
- e. Percentage of space occupied by telecommunications equipment
- f. AC power source
- g. Rate(s) paid for AC power
- h. DC power capacity
- i. Maintenance costs incurred in 2002
- j. Percentage of space occupied by non-AT&T telecommunications equipment
- k. Building structure information, including the number of floors, whether the building has a basement, and where any non-equipment (Le., restrooms, break-rooms, office space, etc.) is located
- l. Security measures utilized

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 9: If the answer to interrogatory 7 is yes, does AT&T lease any of the space in the buildings identified in response to Interrogatory 8 to other firms?

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward

looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 10: If the answer to Interrogatory 9 is yes, please provide the following information with respect to each arrangement AT&T has to allow another firm to occupy space in a building identified in response to Interrogatory 8:

- a. Address
- b. CLLI code
- c. Type of arrangement (i.e., caged, cageless, virtual, etc.)
- d. Contract term
- e. In-service date
- f. Up-front charges (Le., the equivalent of NRCs) and their associated services and/or facilities
- g. Monthly charges and their associated services and/or facilities
- h. Annual charges and their associated services and/or facilities
- i. Any charges not identified in response to Interrogatory 1 O(f)-(h) and their associated services and/or facilities
- j. Power provided in amps, specifying fused or load
- k. Square footage leased
- l. Cage size, if applicable (including cage height)
- m. Cage material, if applicable
- n. Number of relay racks occupied
- o. Types and numbers of equipment pieces in arrangement

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 11: For each of the last three complete power plants that AT&T, its parents, or its affiliates have installed, please provide:

- a. Location of the power plant
- b. In-service date
- c. Types and numbers of facilities (e.g., batteries, rectifiers, backup generator) included in the power plant
- d. Total investment in the facilities identified in response to Interrogatory 11 (c)
- e. Total costs, including labor and building conditioning, associated with installing the power plant
- f. Installation costs associated with each piece of equipment identified in response to Interrogatory 11 (c), broken out by individual pieces of equipment
- g. Total amperage generated by the power plant

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 12: For each of the last three complete power plants that AT&T has installed in Florida, please provide:

- a. Location of the power plant
- b. In-service date
- c. Types and numbers of facilities (e.g., batteries, rectifiers, backup generator) included in the power plant
- d. Total investment in the facilities identified in response to Interrogatory 12(c)
- e. Total costs, including labor and building conditioning, associated with installing the power plant
- f. Installation costs associated with each piece of equipment identified in response to Interrogatory 12(c), broken out by individual pieces of equipment
- g. Total amperage generated by the power plant

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 13: For each of the last three power plant additions that AT&T, its parents, or its affiliates have installed, please provide:

- a. Location of the power plant
- b. In-service date
- c. Types and numbers of facilities (e.g., batteries, rectifiers, backup generator) included in the power plant
- d. Total investment in the facilities identified in response to Interrogatory 13(c)
- e. Total costs, including labor and building conditioning, associated with installing the power plant
- f. Installation costs associated with each piece of equipment identified in response to interrogatory 13(c), broken out by individual pieces of equipment
- g. Total amperage generated by the additions to the power plant
- h. Total amperage generated by the power plant before and after the power plant additions

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local

telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 14: For each of the last three power plant additions that AT&T has installed in Florida, please provide:

- a. Location of the power plant
- b. In-service date
- c. Types and numbers of facilities (e.g., batteries, rectifiers, backup generator) included in the power plant
- d. Total investment in the facilities identified in response to Interrogatory 14(c)
- e. Total costs, including labor and building conditioning, associated with installing the power plant
- f. Installation costs associated with each piece of equipment identified in response to Interrogatory 14(c), broken out by individual pieces of equipment
- g. Total amperage generated by the additions *to* the power plant
- h. Total amperage generated by the power plant before and after the power plant additions

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 15: For purposes of its internal record keeping:

- a. What costs does AT&T associate with the installation of cable racking?
- b. What did the costs identified in response to Interrogatory 15(a) total in 2002 (or 2001, if 2002 data is not yet available), and what linear footage of racking were they associated with?

- c. What are the dimensions of the cable racking that AT&T typically installs, and what percentage of the cable racking associated with the costs identified in response to Interrogatory 15(b) were of those dimensions?
- d. What costs does AT&T associate with the acquisition and installation of power cables?
- e. What did the costs identified in response to Interrogatory 15(d) total in 2002 (or 2001, if 2002 data is not yet available), and what linear footage of cabling were they associated with?
- f. What was AT&T's breakdown by linear foot and gauge of the cable identified in response to Interrogatory 15(e)?

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 16: Please provide the depreciation lives AT&T uses for the following assets:

- a. Buildings
- b. Digital switching equipment
- c. Circuit equipment
- d. Underground copper cable
- e. Underground fiber cable
- f. Conduit

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate

TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 17: Does AT&T use straight line or accelerated methods to calculate depreciation rates? If the answer is both, please identify which categories of assets use which method.

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 18: Please provide the formula used for calculation of the depreciation rates AT&T uses. If different categories of plant use different formulas, please provide all formulas and identify which category of assets use which formula.

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements

including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 19: Does AT&T use remaining life depreciation methodology to develop its depreciation rates? If yes, please explain in detail how the remaining life is developed and how it is used in the depreciation rate calculation.

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 20: Referring to Exhibit AES-1 to the direct testimony of Verizon witness Allen Sovereign filed on February 4, 2003, please provide the depreciation lives AT&T uses for the same or similar accounts or categories of equipment on the exhibit.

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to AT&T collocation arrangements or other telecom facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. AT&T, as a competitive ALEC attempting to enter the local

telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory No. 21: What cost of capital does AT&T use to evaluate local exchange projects? Please specify whether this cost of capital is after-tax or before tax. Please also specify the methodology, inputs, and assumptions AT&T uses to calculate this cost of capital, including the capital structure, cost of debt, risk premium, flotation costs, and technology premium.

Response: AT&T objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence.

The cost of equity for any CLEC is not in any way probative of the appropriate cost of capital to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements, including collocation. AT&T as a competitive ALEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.