REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.	DOCKET NO. 981834-TP
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 Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.	DOCKET NO. 990321-TP August 15, 2003

AT&T Communications of the Southern States, LLC ("AT&T") pursuant to Rule 1.340, Florida Rules of Civil Procedure and Order No. PSC-02-1513-PCO-TP, issued in this docket on November 4, 2002, hereby files its response to Staff's Fifth Set of Interrogatories.

SUBMITTED this 15th day of May, 2003.

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Attorney for AT&T Communications of the Southern States, LLC

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 73 (a): Please identify all jurisdictions of which you are aware in which an ILEC meters DC power provided to an AT&T collocation arrangement. Please also identify the ILEC involved and the agreement between AT&T and the ILEC.

Response: Metering of DC power provided to AT&T collocation arrangements is or will be occurring in Minnesota, Illinois, Tennessee, and Georgia.

Minnesota: AT&T is aware that current practices call for metering and remote monitoring of DC power in virtually all locations at the power plant's power distribution board, which feeds power to BDFBs. Minnesota is the only jurisdiction in which an ILEC has agreed to utilize this facility for the purpose of measuring DC usage for billing purposes. Quest has agreed in Minnesota to remotely read the Power Plant ammeters at the feeder cables for the AT&T BDFBs. AT&T believes that all power plants are similarly equipped for remote meter reading and for those that might not be so equipped, they should be updated to today's standards. However, this type of measurement would not facilitate measurement for billing if multiple CLECs are sharing the same BDFB.

Illinois: Illinois measures power usage through a separate meter for billing purposes. The meter reads the DC power consumption of the individual power feeds of each collocator from the BDFB. The ILEC involved in Illinois is SBC-Ameritech. There is not an "agreement" per se between AT&T and SBC-Ameritech in Illinois. The metering of power is reflected in the collocation tariff in that state (Illinois Bell Telephone Company, I.C.C. Tariff No. 20, Part 23, Section 4, Subsection D – Prices) and was the result of a Commission order.

Tennessee and Georgia: AT&T is in the process of finalizing the arrangements for metering power for billing purposes in Tennessee at present. The method for reading the meters in Tennessee is for a vendor to manually read the ammeters in the AT&T BDFBs.

There is a Commission order pending in Georgia (BellSouth) for measured DC charges, and BellSouth is in the process of

developing a cost study to comply with that order.

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DATED: July 22, 2003

Interrogatory 73 (b): For each of those jurisdictions in which an ILEC meters DC power provided to an AT&T collocation arrangement, please identify those states in which the state commission ordered the ILEC to meter DC power (as opposed to a negotiated agreement). Please identify the commission orders where an ILEC was directed to meter DC power.

Response: Illinois and Georgia. Copies provided in response to Request for Production No. 42.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 73 (c):	For those jurisdictions in which an ILEC meters DC power provided to an AT&T collocation arrangement, which entity provides the meter?
Response:	In Illinois, the meter is provided by SBC-Ameritech and paid for by the CLECs through a non-recurring charge. In Tennessee, AT&T has already worked out an arrangement with BellSouth where AT&T will use the meters that are included with the AT&T-provided BDFBs in the collocation cage. In Minnesota, the metering will be performed semi-annually through remote access by the Quest power engineers.

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DATED:	July 22, 2003
Interrogatory 73 (d):	For those jurisdictions in which an ILEC meters DC power provided to an AT&T collocation arrangement and AT&T provided the meter, what was the cost of the meter?
Response:	Thus far, in locations where AT&T has provided the meter it has been an integrated part of the BDFB and there was no incremental cost to AT&T. In addition, Mr. Turner has obtained two hand-held DC amperage meters and did so without any discount related to volume or other basis. The most recent meter purchased had a cost of $291.53. The other meter purchased was approximately the same cost.

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DATED: July 22, 2003

Interrogatory 73 (e): For those jurisdictions in which an ILEC meters DC power provided to an AT&T collocation arrangement and the ILEC provided the meter, did the ILEC assess AT&T a non-recurring charge for the meter?

Response: In Illinois, SBC-Ameritech does impose a nonrecurring charge for the cost of installing the meter.

In Minnesota, the ILEC utilizes the power plant's built-in power monitoring system to measure the usage. It is AT&T's understanding that this capability exists in most, if not all ILEC power plants.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 73 (f):	If the response to (e) is affirmative, please identify the amount of the non-recurring charge.
Response:	In Illinois, the nonrecurring charge is $2,911.85.
	In Minnesota, the details of charges have not yet been finalized.

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DATED: July 22, 2003

Interrogatory 73 (g): If the response to (e) is negative, did the ILEC recover the meter costs in a recurring rate?

Response: In Illinois, SBC-Ameritech imposes a nonrecurring charge as documented in response to Interrogatory 73(e) and 73(f). However, SBC-Ameritech also imposes a recurring charge for power measurement. It is not clear from the tariff what precisely this nonrecurring charge covers. It is simply referred to as "Power Measurement Billing Charge – Per Customer Arrangement."

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DATED: July 22, 2003

Interrogatory 73 (h): If the response to (g) is affirmative, please identify the recurring rates assessed. If applicable, please identify the rates with and without inclusion of meter costs.

Response: In Illinois, the recurring charge is $11.49.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 73 (i):	Were the rates identified in response to (f) and (h) approved by a state commission (as opposed to negotiated)
Response:	In Illinois, yes.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 73 (j):	If the response to (i) is affirmative, please identify the state commission orders in which the rates were approved.
Response:	See response to Interrogatory 73(i).

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 74 (a): Please refer to page 14, lines 26-27 of witness Turner's revised rebuttal testimony. Here the witness advocates using the BellSouth Cost Calculator (BSCC) as the starting point for the development of collocation rates.

(a) Is the BSCC a proprietary and confidential asset of BellSouth?

Response: This is a questions more appropriately answered by BellSouth. Notwithstanding, the cover page to the BellSouth Cost Calculator notes the following: "Copyright 1997-2002 BellSouth Telecommunications, All Rights Reserved." There is no notation on the opening screen of the BellSouth Cost Calculator to indicate that it is a "proprietary and confidential asset" of BellSouth other than whatever protection is already provided to BellSouth by the BellSouth Cost Calculator being copyrighted. In addition, none of the output worksheets produce output that is noted as being a "proprietary and confidential asset" of BellSouth. There are "proprietary and confidential" inputs that are used by the BellSouth Cost Calculator, but these are housed in separate spreadsheets that are used to develop the inputs into the BellSouth Cost Calculator, and the confidential data is appropriately marked by BellSouth in its input development spreadsheets. To the extent that the BCC itself has been filed with the Commission in this proceeding, any questions of confidentiality would be governed by the Commission's determination that the BCC itself (as compared to the data input into the BCC) should be held confidential and exempt from public disclosure pursuant Chapter 119, Florida Statutes.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 74 (b): Please refer to page 14, lines 26-27 of witness Turner's revised rebuttal testimony. Here the witness advocates using the BellSouth Cost Calculator (BSCC) as the starting point for the development of collocation rates.

(b) If your response to (a) is affirmative, please explain how Sprint and Verizon will be able to use and review the BSCC to provide this Commission with a complete record.

Response: See response to Interrogatory 74(a). This response was "negative." Nonetheless, even though there is no claim that the BellSouth Cost Calculator is "proprietary and confidential asset" of BellSouth, it should also be noted that, as parties to the proceeding, Sprint and Verizon are permitted to review and use the BellSouth Cost Calculator by way of their participation in this consolidated cost proceeding to establish collocation rates and charges for all three companies. As such, notwithstanding that BellSouth may claim that the BellSouth Cost Calculator is a "proprietary and confidential asset," the use of this model within the cost proceeding to set collocation rates is clearly allowable. If the Commission should determine to set the rates and charges for collocation on a consistent basis for all three ILECs then a single methodology reflected in a single model is appropriate.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 74 (c): Please refer to page 14, lines 26-27 of witness Turner's revised rebuttal testimony. Here the witness advocates using the BellSouth Cost Calculator (BSCC) as the starting point for the development of collocation rates.

(c) Are there any licensing fees which must be paid to BellSouth if others use the BSCC?

Response: Please see the response to Interrogatory 74(b). In addition, AT&T is not aware of what BellSouth's requirements are regarding the use of the BellSouth Cost Calculator and any associated licensing fees. It would not appear that, since BellSouth has proposed the use of the BCC in this proceeding, there would be any license fees for any party responding to the model and advocating the use of the model or its methodology in the context of this proceeding.

AT&T has developed models in other state proceedings (HAI Model 5.3, the AT&T/MCI Collocation Cost Model, and the AT&T/MCI Nonrecurring Cost Model) that have been used by multiple incumbents in a single state. AT&T has never sought the payment of licensing fees in developing rates and charges for the various incumbents from these models in that the use of the models was within the context of a cost proceeding ordered by the state Commission. It is only within this context that AT&T seeks to use the BellSouth Cost Calculator to establish collocation rates and charges for all three incumbents in Florida.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 75 (a): Please refer to page 3, lines 20-22 of witness Turner's revised rebuttal testimony.

(a) Please identify each situation in which "inputs and costs should be virtually identical."

Response: Mr. Turner has proposed that all of the inputs for the development of collocation cost be identical between the three incumbents with the exception of the cost of capital and the common cost factor. The discussion of these issues follow the summary statement quoted above in Interrogatory 75(a) at pages 3-14 of Mr. Turner's Revised Rebuttal Testimony.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 76:	Please identify all collocation elements and the quantity of each element purchased by AT&T in Florida in the last 18 months from BellSouth.
Response:	Please see Attachment A. AT&T has provided the data requested for the last 12 months. In order to pull data prior to that time, AT&T will need to do a manual retrieval of the information. This could take some time to accomplish. AT&T will supplement this response as soon as that information is available.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 77:	Please identify all collocation elements and the quantity of each element purchased by AT&T in Florida in the last 18 months from Verizon.
Response:	Please see Attachment A. AT&T has provided the data requested for the last 12 months. In order to pull data prior to that time, AT&T will need to do a manual retrieval of the information. This could take some time to accomplish. AT&T will supplement this response as soon as that information is available.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 78:	Please identify all collocation elements and the quantity of each element purchased by AT&T in Florida in the last 18 months from Sprint.
Response:	Please see Attachment A. AT&T has provided the data requested for the last 12 months. In order to pull data prior to that time, AT&T will need to do a manual retrieval of the information. This could take some time to accomplish. AT&T will supplement this response as soon as that information is available.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 79 (a): Please refer to page 10, lines 18-19, of witness Turner's revised rebuttal testimony.

(a) Please identify with specificity any rate elements (in addition to those found on page 5 of Sprint exhibit JRD-2) that Sprint would need to include in its list of collocation elements in order to provision physical collocation to an ALEC.

Response: Mr. Turner's testimony is that BellSouth provides the only cost model that "develops a comprehensive set of collocation elements for all of the forms of collocation." Consistent with this testimony, the following is a list of the elements missing from the Sprint collocation elements:

Physical Collocation - Application Cost - Initial - Disconnect Only
Physical Collocation - Fiber Entrance Cable Installation, per Cable - Disconnect Only
Physical Collocation - 2-Wire Cross-Connects - Disconnect Only
Physical Collocation - 4-Wire Cross-Connects - Disconnect Only
Physical Collocation - DS1 Cross-Connects - Disconnect Only
Physical Collocation - DS3 Cross-Connects - Disconnect Only
Physical Collocation - 2-Fiber Cross-Connect - Disconnect Only
Physical Collocation - 4-Fiber Cross-Connect - Disconnect Only
Physical Collocation - Application Cost - Subsequent - Disconnect Only
Physical Collocation - Copper Entrance Cable Installation, Per Cable - Disconnect Only
Physical Collocation - Administration Only Application Fee - Disconnect Only
Physical Collocation - Copper Entrance Cable Installation, per cable (0 Mh to Vault Splice) - Disconnect Only
Physical Collocation - Fiber Entrance Cable Installation, per cable (0 Mh to Vault Splice) - Disconnect Only

All of the elements identified above relate to the issue of the disconnection of collocation arrangements. The disconnection of collocation arrangements is a legitimate issue for collocators and the cost of such discontinuance is considered in the BellSouth Cost Calculator. However, with Sprint, there are no cost elements even contemplated for the disconnection of collocation

arrangements leaving ALECs in a situation where they would have to incur unknown costs that would likely lead to further cost proceedings before this Commission. With the BellSouth Cost Calculator, these cost elements are considered beforehand.

In addition to the disconnect cost elements above, there are further elements missing from the Sprint Exhibit JRD-2 for Physical Collocation:

Physical Collocation – 2-Fiber Cross-Connect
Physical Collocation – Power Reduction Application Fee
Physical Collocation – Copper Entrance Cable Support Structure, Per Each 100 Pairs
Physical Collocation – Copper Entrance Cable Installation, Per Cable
Physical Collocation – Copper Entrance Cable Installation, Per Each 100 Pairs
Physical Collocation – Copper Entrance Cable Installation, per cable (0 Mh to Vault Splice)
Physical Collocation – Copper Entrance Cable Installation, per each 100 pair

Note: It is possible that parts of the Copper Entrance Cable costs identified above are partially included in Sprint's Internal Cable – Per 100-Pr Copper Stub Cable and Internal Cable Space – Per 100 Pr Copper Stub Cable, but it does not appear that Sprint's elements are comprehensive from the vault to the collocation arrangement. Moreover, Sprint's cost study asserts that this element is primarily used for Virtual Collocation. Instead, BellSouth affirmatively asserts that its costs are for Physical Collocation

Finally, Sprint has noted that all of its rates for Adjacent Collocation would be ICB – individual case basis. ICB rates do not permit this Commission to confirm whether the charges that Sprint would impose would be cost-based or not. As such, the following determinative rates found in the BellSouth Cost Calculator are also shortcomings in the filing made by Sprint:

Adjacent Collocation - Space Cost per Sq. Ft.
Adjacent Collocation - Electrical Facility Cost per Linear Ft.
Adjacent Collocation - 2-Wire Cross-Connects
Adjacent Collocation - 2-Wire Cross-Connects - Disconnect Only
Adjacent Collocation - 4-Wire Cross-Connects
Adjacent Collocation - 4-Wire Cross-Connects - Disconnect

Only
Adjacent Collocation - DS1 Cross-Connects
Adjacent Collocation - DS1 Cross-Connects - Disconnect Only
Adjacent Collocation - DS3 Cross-Connects
Adjacent Collocation - DS3 Cross-Connects - Disconnect Only
Adjacent Collocation - 2-Fiber Cross-Connect
Adjacent Collocation - 2-Fiber Cross-Connect - Disconnect Only
Adjacent Collocation - 4-Fiber Cross-Connect
Adjacent Collocation - 4-Fiber Cross-Connect - Disconnect Only
Adjacent Collocation - Application Cost
Adjacent Collocation - Application Cost - Disconnect Only
Adjacent Collocation - 120V, Single Phase Standby Power Cost per AC Breaker Amp
Adjacent Collocation - 240V, Single Phase Standby Power Cost per AC Breaker Amp
Adjacent Collocation - 120V, Three Phase Standby Power Cost per AC Breaker Amp
Adjacent Collocation - 277V, Three Phase Standby Power Cost per AC Breaker Amp

Finally, BellSouth has developed a set of physical collocation elements for the remote terminal that are not contemplated in the Sprint Exhibit JRD-2:

Physical Collocation In The Remote Terminal - Application Fee
Physical Collocation In The Remote Terminal - Application Fee - Disconnect Only
Physical Collocation In The Remote Terminal - Per Rack/Bay
Physical Collocation In The Remote Terminal - Security Access Key
Physical Collocation in the RT - Space Availability Report per premises requested
Physical Collocation in the RT- Remote Site CLLI Code Request, per CLLI Code Requested

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 79 (b): Please refer to page 10, lines 18-19, of witness Turner's revised rebuttal testimony.

(b) Please identify with specificity any rate elements (in addition to those found on page 5 of Sprint exhibit JRD-2) that Sprint would need to include in its list of collocation elements in order to provision virtual collocation to an ALEC.

Response: Mr. Turner's testimony is that BellSouth provides the only cost model that "develops a comprehensive set of collocation elements for all of the forms of collocation." Consistent with this testimony, the following is a list of the elements missing from the Sprint collocation elements:

Virtual Collocation – Application Cost - Disconnect Only
Virtual Collocation - Fiber Entrance Cable Installation, per Cable - Disconnect Only
Virtual Collocation - 2-wire Cross Connects - Disconnect Only
Virtual Collocation - 4-wire Cross Connects - Disconnect Only
Virtual Collocation - DS1 Cross Connects - Disconnect Only
Virtual Collocation - DS3 Cross Connects - Disconnect Only
Virtual Collocation - 2-Fiber Cross Connect - Disconnect Only
Virtual Collocation - 4-Fiber Cross Connect - Disconnect Only

All of the elements identified above relate to the issue of the disconnection of collocation arrangements. The disconnection of collocation arrangements is a legitimate issue for collocators and the cost of such discontinuance is considered in the BellSouth Cost Calculator. However, with Sprint, there are no cost elements even contemplated for the disconnection of collocation arrangements leaving ALECs in a situation where they would have to incur unknown costs that would likely lead to further cost proceedings before this Commission. With the BellSouth Cost Calculator, these cost elements are considered beforehand.

The only other element that appears to be missing for Sprint for Virtual Collocation is the following:

Virtual Collocation - 2-wire Cross Connects

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 80 (a): Please refer to page 10, lines 20-21, of witness Turner's revised rebuttal testimony.

(a) Please identify with specificity any rate elements (in addition to those found on pages 38-43 of Verizon exhibit BKE-1) that Verizon would need to include in its list of collocation elements in order to provision physical collocation to an ALEC.

Response: Mr. Turner's testimony is that BellSouth provides the only cost model that "develops a comprehensive set of collocation elements for all of the forms of collocation." Consistent with this testimony, the following is a list of the elements missing from the Verizon collocation elements:

Physical Collocation - Application Cost - Initial - Disconnect Only
Physical Collocation - Fiber Entrance Cable Installation, per Cable - Disconnect Only
Physical Collocation - 2-Wire Cross-Connects - Disconnect Only
Physical Collocation - 4-Wire Cross-Connects - Disconnect Only
Physical Collocation - DS1 Cross-Connects - Disconnect Only
Physical Collocation - DS3 Cross-Connects - Disconnect Only
Physical Collocation - 2-Fiber Cross-Connect - Disconnect Only
Physical Collocation - 4-Fiber Cross-Connect - Disconnect Only
Physical Collocation - Application Cost - Subsequent - Disconnect Only
Physical Collocation - Copper Entrance Cable Installation, Per Cable - Disconnect Only
Physical Collocation - Administration Only Application Fee - Disconnect Only
Physical Collocation - Copper Entrance Cable Installation, per cable (0 Mh to Vault Splice) - Disconnect Only
Physical Collocation - Fiber Entrance Cable Installation, per cable (0 Mh to Vault Splice) - Disconnect Only

All of the elements identified above relate to the issue of the disconnection of collocation arrangements. The disconnection of collocation arrangements is a legitimate issue for collocators and the cost of such discontinuance is considered in the BellSouth Cost Calculator. However, with Verizon, there are no cost

elements even contemplated for the disconnection of collocation arrangements leaving ALECs in a situation where they would have to incur unknown costs that would likely lead to further cost proceedings before this Commission. With the BellSouth Cost Calculator, these cost elements are considered beforehand.

In addition to the disconnect cost elements above, there are further elements missing from the Verizon Exhibit BKE-1 for Physical Collocation:

Physical Collocation – 2-Fiber Cross-Connect
Physical Collocation - 4-Fiber Cross-Connect
Physical Collocation – Power Reduction Application Fee
Physical Collocation – Copper Entrance Cable Support Structure, Per Each 100 Pairs
Physical Collocation – Copper Entrance Cable Installation, Per Cable
Physical Collocation – Copper Entrance Cable Installation, Per Each 100 Pairs
Physical Collocation – Copper Entrance Cable Installation, per cable (0 Mh to Vault Splice)
Physical Collocation – Copper Entrance Cable Installation, per each 100 pair
Adjacent Collocation - 2-Fiber Cross-Connect
Adjacent Collocation - 2-Fiber Cross-Connect - Disconnect Only
Adjacent Collocation - 4-Fiber Cross-Connect
Adjacent Collocation - 4-Fiber Cross-Connect - Disconnect Only
Adjacent Collocation - Electrical Facility Cost per Linear Ft.
Adjacent Collocation - 120V, Single Phase Standby Power Cost per AC Breaker Amp
Adjacent Collocation - 240V, Single Phase Standby Power Cost per AC Breaker Amp
Adjacent Collocation - 120V, Three Phase Standby Power Cost per AC Breaker Amp
Adjacent Collocation - 277V, Three Phase Standby Power Cost per AC Breaker Amp

Finally, BellSouth has developed a set of physical collocation elements for the remote terminal that are not contemplated in the Verizon Exhibit BKE-1:

Physical Collocation In The Remote Terminal - Application Fee
Physical Collocation In The Remote Terminal - Application Fee - Disconnect Only
Physical Collocation In The Remote Terminal - Per Rack/Bay
Physical Collocation In The Remote Terminal - Security Access

Key
Physical Collocation in the RT - Space Availability Report per premises requested
Physical Collocation in the RT- Remote Site CLLI Code Request, per CLLI Code Requested

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 80 (b): Please refer to page 10, lines 20-21, of witness Turner's revised rebuttal testimony.

(b) Please identify with specificity any rate elements (in addition to those found on pages 38-43 of Verizon exhibit BKE-1) that Verizon would need to include in its list of collocation elements in order to provision virtual collocation to an ALEC.

Response: Mr. Turner's testimony is that BellSouth provides the only cost model that "develops a comprehensive set of collocation elements for all of the forms of collocation." Consistent with this testimony, the following is a list of the elements missing from the Verizon collocation elements:

Virtual Collocation – Application Cost - Disconnect Only
Virtual Collocation - Fiber Entrance Cable Installation, per Cable - Disconnect Only
Virtual Collocation - 2-wire Cross Connects - Disconnect Only
Virtual Collocation - 4-wire Cross Connects - Disconnect Only
Virtual Collocation - DS1 Cross Connects - Disconnect Only
Virtual Collocation - DS3 Cross Connects - Disconnect Only
Virtual Collocation - 2-Fiber Cross Connect - Disconnect Only
Virtual Collocation - 4-Fiber Cross Connect - Disconnect Only

All of the elements identified above relate to the issue of the disconnection of collocation arrangements. The disconnection of collocation arrangements is a legitimate issue for collocators and the cost of such discontinuance is considered in the BellSouth Cost Calculator. However, with Verizon, there are no cost elements even contemplated for the disconnection of collocation arrangements leaving ALECs in a situation where they would have to incur unknown costs that would likely lead to further cost proceedings before this Commission. With the BellSouth Cost Calculator, these cost elements are considered beforehand.

The only other elements that appear to be missing for Verizon for Virtual Collocation are the following:

Virtual Collocation - 2-wire Cross Connects
Virtual Collocation - 4-wire Cross Connects

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 81 (a): Please refer to page 25, lines 8-11, of witness Turner's revised rebuttal testimony.

(a) Please explain why an 85 percent fill factor is appropriate and in what situations it was "observed".

Response: In Mr. Turner's experience in reviewing and developing DC Power cost studies, the use of a fill factor of approximately 85 percent is appropriate. The concept of fill is to permit on an engineering basis the ability for the engineer to augment the capacity of the plant prior to it being required. As such, the level of fill that is set for particular elements is a tradeoff between the rate of growth in the use of an asset and the amount of time that it takes to actually augment that element. The rate of growth in the use of the DC power plant is relatively stable only growing to the extent that new equipment is being added to the central office or line growth on existing equipment is occurring. The time to augment a DC power plant given that space is available is relatively short. As such, based on this relationship and in Mr. Turner's experience in reviewing cost studies from around the country on DC power (the sense in which a factor of approximately 85 percent was "observed"), the fill factor Mr. Turner proposed is reasonable.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 82 (a): Please refer to page 28, lines 15-16, of witness Turner's revised rebuttal testimony.

(a) Please explain why BellSouth's response was not adequate?

Response: In Georgia, the information provided by BellSouth in discovery was readily convertible into the rate per kilowatt hour paid by BellSouth for AC power. The information BellSouth provided was actual invoices with the amount paid by BellSouth and the amount of kilowatt hours purchased by BellSouth. BellSouth did not provide equivalent information in Florida even though essentially the same question was asked in this state.

As such, Mr. Turner used a public source for the kilowatt hour rate as documented in his testimony at pages 28-29.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 82 (b): Please refer to page 28, lines 15-16, of witness Turner's revised rebuttal testimony.

(b) Has AT&T attempted to obtain an adequate response via a Motion to Compel or other means? If not, why not?

Response: AT&T has not filed a motion to compel response to the discovery request in question. AT&T is discussing the status of numerous discovery requests with BellSouth. If the discussions are not successful in obtaining the information sought, AT&T reserves the right to file a motion to compel.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 83 (a): Please refer to page 38, lines 24-25, of witness Turner's revised rebuttal testimony.

(a) Please explain why you believe 1.0 hour is a reasonable activation time per request for security cards?

Response: In reviewing the process and costs for processing security cards, a time of approximately one hour to process five cards has typically been the time (or more accurately, the cost) that has been associated with this task. Mr. Turner simply reflected in testimony that BellSouth use of 1.0 hour was in line with the costs that he has proposed in other proceedings and has seen proposed as well.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 84 (a): Please refer to page 39, lines 8-9, of witness Turner's revised rebuttal testimony.

(a) Please explain the basis for your recommendation that 0.2 labor hours per card is "more reasonable and should be used."

Response: Once the 1.0 hours discussed in testimony and in response to Interrogatory 83(a) is divided by BellSouth's assumption of five cards, the result is 0.2 labor hours per card. This resulting time is primarily a cost calculation and represents the time Mr. Turner proposes for this cost. Mr. Turner's testimony is that this time and the resulting cost is more reasonable than the 0.8583 hours (51.5 minutes) per card proposed by BellSouth.

Further, BellSouth's own cost study, if properly used, actually asserts the same time. Mr. Turner would also point out that Sprint proposes a cost of $15.00 per card, which is lower even than that proposed by Mr. Turner.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 85: Please explain why witness Turner did not provide an analysis of the investments used by Verizon and Sprint in their cost studies as he did for BellSouth.

Response: Please see pages 4-6 and 15 of Mr. Turner's Revised Rebuttal Testimony.

In summary: "The investments for telecommunications assets, particularly in a simple technology area such as collocation, should not have much variation at all between incumbents in Florida. As an example, the investment for the DC power plant between the three companies uses the same set of components: batteries, rectifiers, controllers, cable, battery distribution fuse bays, and the like. BellSouth, Sprint, and Verizon all buy essentially the same components with equivalent capabilities and design characteristics to provide for DC power in their central offices. Further, given the scope of these three companies, there should not be widely differing costs for the purchase of these assets between the three companies. As such, the Commission should anticipate that the investment per DC amp between the three companies should be similar, and that the application of the similar investment in the three different cost models should lead to similar resulting costs."

The example provided above and discussed in detail in the testimony for DC power also relates to the other collocation elements as well. There should not be significant variation in the costs between the three incumbents for the components involved with collocation. As such, the task at hand is to determine efficient, forward-looking investments and costs that should be used to develop collocation rates and charges. To the extent that Mr. Turner agreed with those proposed by BellSouth, Mr. Turner recommends using these for all three companies in that variation would not exist in an efficient, forward-looking cost study between the three. Where Mr. Turner has a concern with BellSouth's proposed input, Mr. Turner has proposed an alternative input with justification and recommends, again, that these inputs be used for all three incumbents as the efficient, forward-looking investments and costs for collocation.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 86:	If the Florida Commission rejects AT&T's proposal to use the BSCC, has AT&T provided any alternative proposal or suggested adjustments for Sprint and Verizon?
Response:	AT&T has not filed a restated Sprint or Verizon cost study. However, the cost inputs that Mr. Turner has proposed could be used in the Sprint and Verizon cost studies if the Commission intended to retain all three different cost models.

REQUEST:	Staff Fifth Set of Interrogatories
DATED:	July 22, 2003
Interrogatory 87 (a):	Please refer to Section 5 of BellSouth's Collocation Cost Study. At page 6 of the study it is noted " . . . the ALEC does not have to purchase the space enclosure i.e. cage from BellSouth." (a) Has AT&T purchased a cage enclosure from someone other than BellSouth.
Response:	For a cage located in a BellSouth central office, AT&T is unaware of any cage enclosures purchased from any other vendor other than BellSouth.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 87 (b): Please refer to Section 5 of BellSouth's Collocation Cost Study. At page 6 of the study it is noted " . . . the ALEC does not have to purchase the space enclosure i.e. cage from BellSouth."

(b) If your response to (a) is affirmative, please provide the price you paid for the cage enclosure, the name of the vendor that constructed the enclosure, and in which BellSouth central office the cage was placed.

Response: See response to 87(a).

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 87 (c): Please refer to Section 5 of BellSouth's Collocation Cost Study. At page 6 of the study it is noted " . . . the ALEC does not have to purchase the space enclosure i.e. cage from BellSouth."

(c) Do you believe purchasing a cage enclosure from someone other than BellSouth is a viable option for an ALEC wishing to collocate in a BellSouth central office. Please explain your response.

Response: Yes. BellSouth chooses a vendor from the same list that is available to AT&T for installing a cage. The difference is that AT&T can shop for the best price versus quality without involving a middleman.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 87 (d): Please refer to Section 5 of BellSouth's Collocation Cost Study. At page 6 of the study it is noted " . . . the ALEC does not have to purchase the space enclosure i.e. cage from BellSouth."

(d) Do you believe purchasing a cage from someone other than BellSouth would be cheaper than purchasing the cage from BellSouth?

Response: Yes.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 88 (a): Please refer to page 16, lines 7-12, of Verizon witness Ellis' direct testimony.

(a) Do you agree or disagree with witness Ellis' statement that ". . . general technological advances are not likely to lead to "future efficiency gains" in the provisioning of collocation services." Please explain your response.

Response: Most of the technology associated with the collocation services is simple in nature such as partitioning, cable racking, duct work, and the like. These types of elements would likely not have the degree of technological advances that exist with switching or transport systems. However, some change has occurred over time in the way that these systems are implemented that make for more efficient deployments of collocation services. Further, even with simple technology, such as with cross-connect arrangements, some technological development has occurred although not at the pace of switching and transport systems.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 89 (a): Please refer to page 19-20 of Verizon witness Ellis' direct testimony.

(a) Do you believe Verizon's derivation of its average floor space cost element is reasonable? If not, please explain why not.

Response: Mr. Turner did not study Verizon's derivation of its average floor space cost element. Nonetheless, Mr. Turner's proposed floor space rate for Verizon based on the underlying modifications made to BellSouth's land and building investment as documented in Mr. Turner's Revised Rebuttal Testimony is $3.66 per square foot. According to Verizon Exhibit BKE-1, Verizon's proposed rate for floor space is $3.83 per square foot. The difference ($0.17 per square foot) between Verizon's proposal and Mr. Turner's proposal is not significant. As such, while Mr. Turner cannot speak to the details in Florida as to whether Verizon's "derivation of its average floor space cost element is reasonable," the resulting rate does not materially differ from what Mr. Turner believes to be cost-based.

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 89 (b): Please refer to page 19-20 of Verizon witness Ellis' direct testimony.

(b) Do you believe Verizon's derivation of its land and building investments are reasonable? If not, please explain why not.

Response: Please see the response to Interrogatory 89(a).

REQUEST: Staff Fifth Set of Interrogatories

DATED: July 22, 2003

Interrogatory 90 (a): Please refer to page 23 of Verizon witness Ellis' Exhibit BKE-1.

(a) Do you agree with the method used by Verizon for calculating building investment to be used in determining the cost for its floor space element? Please explain your response.

Response: Please see the response to Interrogatory 89(a).

Attachment A
Responsive Document to
Staff Interrogatory Nos. 76-78
August 15, 2003

ST	LEC	July 2002 Vol.	July 2002 Exp	July 2002 UC	Aug 2002 Vol.	Aug 2002 Exp	Aug 2002 UC	Sept 2002 Vol.	Sept 2002 Exp	Sept 2002 UC	Oct 2002 Vol.	Oct 2002 Exp	Oct 2002 UC	Nov 2002 Vol.
FL	BS													
FL	GTE													
FL	Sprint													

Nov 2002 Exp	Nov 2002 UC	Dec 2002 Vol.	Dec 2002 Exp	Dec 2002 UC	Jan 2003 Vol.	Jan 2003 Exp	Jan 2003 UC	Feb 2003 Vol.	Feb 2003 Exp	Feb 2003 UC	Mar 2003 Vol.	Mar 2003 Exp	Mar 2003 UC	Apr 2003 Vol.

Apr 2003 Exp	Apr 2003 UC	May 2003 Vol	May 2003 Exp	May 2003 UC	June 2003 Vol.	June 2003 Exp	June 2003 UC	July 2003 Vol.	July 2003 Exp	July 2003 UC

BellSouth			
USOC	Description	Count	Rate
ESPAX	Expanded interconnection service virtual location, power per breaker AMP		
ESPSX	Bell South virtual expanded interconnection service cable support structure charge		
ESPVX	Bell South virtual interconnection service floor space per sq. ft.		
PE1A1	Physical expanded interconnection service, security access system, new card activation		
PE1FJ	Physical collocation power 48v DC, per fused AMP		
PE1PJ	Physical expanded interconnection service floor space, billing, proxy		
PE1PK	Physical expanded interconnection service floor space for zone B, billing, proxy		
PE1PL	Physical expanded interconnection service power, -48V DC power per AMP		
PE1PM	Physical expanded interconnection service, cable support, billing, proxy		

GTE			
USOC	Description	Count	Rate
CF1AR	Facility Termination, fiber optic patch cord, per connector		
CF1AS	Cable Rack Space-fiber, fiber optic patch cord to fiber distribution frame per cable		
CXCDX	Cross Connect DS-1		
CXCEX	Cross Connect DS-3		
CXCOX	Cross Connect DS-0		
SP1CG	Cable Space		
SP1ER	EIS Environmental Conditioning, per 40 AMP Increment		
SP1MT	Collocation Features & Functions; Maintenance - Base		
SP1PC	DC Power - Per 40 Amps		
SP1SS	Partition Space Arrangement - Per Square Ft.		
XPQ	Misc - Collocation - Physical Interconnection		
XVQ	Misc - Collocation - Virtual Interconnection		

Sprint			
USOC	Description	Count	Rate
ABISP	Additional paper copies of the bill		
EIPSM	Physical collocation conduit space - per foot		
EIPCV	Physical collocation conduit space - vault - per foot of 9 conduit vault		
EIPDC	Physical collocation DC power per fuse amp		
EIPDR	Physical collocation diverse riser space - per foot		
EIPFS	Physical collocation floor space - per square foot		
EIPRM	Physical collocation riser space - per foot		