1		BELLSOUTH TELECOMMUNICATIONS, INC.
2		REVISED DIRECT TESTIMONY OF JERRY HENDRIX
3		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4		DOCKET NO. 030869-TL
5		SEPTEMBER 30, 2003
6		
7	Q.	PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8		TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS
9		ADDRESS.
10		
11	A.	My name is Jerry Hendrix. I am employed by BellSouth as Assistant Vice President,
12		Interconnection Services Marketing. My business address is 675 West Peachtree Street,
13		Atlanta, Georgia 30375.
14		
15	Q.	PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR EDUCATIONAL
16		BACKGROUND AND EXPERIENCE WITH BELLSOUTH.
17		
18	А.	I graduated from Morehouse College in Atlanta, Georgia, in 1975 with a Bachelor of Arts
19		Degree. I began employment with Southern Bell in 1979 and have held various positions in
20		the Network Distribution Department before joining the BellSouth Headquarters Regulatory
21		organization in 1985. On January 1, 1996, my responsibilities moved to Interconnection
22		Services Pricing in the Interconnection Customer Business Unit. As part of this transition I
23		became BellSouth's representative in the negotiation of BellSouth's interconnection
24		agreements including the BellSouth/AT&T Interconnection Agreement, among others.
25		DOCUMENT NUMBER-DATE
		1 09406 SEP 30 SE

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In my current position as Assistant Vice President, Interconnection Services Marketing, I oversee the negotiation of interconnection agreements between BellSouth and Competitive Local Exchange Carriers ("CLECs") in BellSouth's nine-state region, relationships with Independent Telephone Companies and certain product management functions including Switched Access Services.

Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY.

A.

My revised testimony deals with the switched network access issues associated with this filing. This revised testimony serves a four-fold purpose: (1) to describe the categorization of switched access services under revised Section 364.164, (2) to present two methodologies for the calculation of the reduction of intrastate switched network access revenues in which to achieve revenue neutrality, the "mirroring" methodology and the "typical network" methodology, (3) to demonstrate the achievement of rate parity between the composite intrastate switched network access rate with the composite interstate switched network access rate for each methodology, and (4) to present the plan to implement the revenue reduction.

Q. HOW ARE SWITCHED NETWORK ACCESS SERVICES CATEGORIZED UNDER THE REVISED SECTION 364.164?

Α.

The new Florida legislation provides for a new revenue category consisting of basic local telecommunications service revenues and intrastate switched network access revenues. This new revenue category will include approximately 1,700 rate elements associated with intrastate switched network access. These rate elements in this new revenue category

include the rate elements from these sections of the Access Services tariff – Carrier Common Line, BellSouth SWA Services, BellSouth Directory Assistance Services, and Access Service for Local Exchange Companies completion of IntraLATA-Intercompany Long Distance MTS and WATS Calls. The switched network access rate elements are listed in Exhibit SB-3, which is attached to the testimony of BellSouth witness Steve Bigelow.

Q. WHAT IS THE APPROPRIATE METHODOLOGY FOR THE REDUCTION OF INTRASTATE SWITCHED NETWORK ACCESS REVENUES TO ACHIEVE REVENUE NEUTRALITY?

A.

There are two methodologies from which the Commission can choose in order to lower intrastate switched network access revenues for the achievement of revenue neutrality within the new revenue category. The first methodology is developed from a "mirroring" of the recurring rate elements in the new revenue category specified by the legislation: carrier common line, local channel/entrance facility, switched common transport, access tandem switching, interconnection charge, signaling, information surcharge, and local switching. The reduction of these elements to interstate parity is \$136.4M. Revised Exhibit JH-1 provides the detail of the revenue reduction calculated under this methodology.

The second methodology achieves parity by comparison of the "typical network" composite for interstate with the composite with intrastate switched network access rates utilizing the rate elements in BellSouth's annual filing with the Commission, the Florida Access and Toll Report, Tables 1 and 2. The revenue reduction resulting from the achievement of parity using the typical network methodology is \$125.2M. Exhibit JH-2 contains a replication of Tables 1 and 2 as well as the revenue reduction calculations with this methodology.

WHY IS THERE A DIFFERENCE IN THE DEVENILIE IMPACT DE

Q. WHY IS THERE A DIFFERENCE IN THE REVENUE IMPACT BETWEEN THE TWO
 METHODOLOGIES?

The difference in the revenue impact stems from the number of rate elements utilized in each methodology. Both methodologies use the most recent 12 months demand to determine the intrastate switched network access revenue reduction.

The mirroring methodology utilizes all of the recurring switched network access rate elements as specified in Section 364.164(6) and included in the new revenue category (summary shown on revised Exhibit JH-1). The difference in the sum of the revenues calculated from the intrastate rates and the sum of the revenues calculated from the interstate rates is the intrastate switched network access revenue reduction.

On the other hand, the typical network methodology is based on the limited, specific rate elements as reported annually by BellSouth in the Florida Access and Toll Report, Tables 1 and 2 (see Exhibit JH-2). These rate elements are considered to be representative of averages for BellSouth's network. The use of composites from a typical network is consistent with the Commission's past practice for determination of switched access revenue reductions. The typical network methodology relies on network averages regarding minutes of use per line and distances for interoffice mileage. The difference in the composite rates per minute of use for intrastate and interstate switched network access rates are then multiplied by the most recent 12-month demand for local switching. The resulting

1		difference is the intrastate switched network access revenue reduction (see Exhibit JH-2,
2		page 3).
3		
4	Q.	DOES BELLSOUTH'S MIRRORING METHODOLOGY ACHIEVE COMPOSITE RATE
5		PARITY BETWEEN INTRASTATE AND BELLSOUTH'S INTERSTATE SWITCHED
6		NETWORK ACCESS RATES?
7		
8	A.	Yes. Revenues for the recurring rate elements are totaled and divided by the most recent 12
9		months local switching demand to provide composite rates. The composite intrastate
10		switched network access rate proposed upon implementation of the third reduction of this
11		plan is equal to the composite interstate switched network access rate in effect on January 1,
12		2003. The demonstration of composite rate parity is shown on revised Exhibit JH-1.
13		
14	Q.	DOES BELLSOUTH'S TYPICAL NETWORK METHODOLOGY ACHIEVE
15		COMPOSITE RATE PARITY BETWEEN INTRASTATE AND BELLSOUTH'S
16		INTERSTATE SWITCHED NETWORK ACCESS RATES?
17		
18	A.	Yes. The composite intrastate switched network access rate proposed after implementation
19		of the third reduction is equal to the composite interstate switched network access rate in
20		effect on January 1, 2003. These composite rates are shown on Exhibit JH-2.
21		
22	Q.	HOW DOES BELLSOUTH PLAN TO IMPLEMENT THE PROPOSED ACCESS
23		REVENUE REDUCTIONS ASSOCIATED WITH EACH METHODOLOGY?

A. In both methodologies, BellSouth proposes to implement the access revenue reduction
during the twenty-four (24) month period. The first reduction will be taken during the first
quarter, 2004 (1Q04), the second reduction during the first quarter, 2005 (1Q05), and the
third reduction during the first quarter, 2006 (1Q06). The proposed reductions will be taken
in the following manner:

1Q04 - 40 percent

1005 - 35 percent

1Q06 – 25 percent

For both methodologies proposed by BellSouth, implementation of the 1Q04 reduction will eliminate originating Carrier Common Line (CCL) revenues and reduce terminating CCL revenues. For both methodologies again, the 1Q05 reduction will eliminate terminating CCL revenues and reduce local switching revenues. For both methodologies again, the 1Q06 reduction will be taken in local switching revenues. Revised Exhibit JH-3 provides the details of the implementation of the access revenue reductions.

Q. HOW WILL THE MOST RECENT 12 MONTHS PRICING UNITS BE UTILIZED TO IMPLEMENT THE ACCESS REDUCTION?

A. To determine the access revenue reduction for this filing, BellSouth used most recent 12 months pricing units (July 2002 through June 2003) as required by the legislation and as described above. Therefore, for presentation of both methodologies, the same demand is utilized for each year.

Upon the Commission's selection and approval of BellSouth's petition, BellSouth intends to update its filing with the most recent 12 months pricing units. It is anticipated that pricing units at least through September 2003 will be available. This procedure allows calculation of the impacts to switched network access and to the corresponding basic local telecommunications service revenues utilizing the most current pricing units available.

Likewise, BellSouth intends to make similar filings prior to the beginning of the last two reductions. Accordingly, the most recent 12 months demand will be utilized to set rates to be implemented on 1Q05 and 1Q06. This procedure will allow for a more accurate demonstration of the achievement of revenue neutrality for the second and third reductions.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A.

Yes.

SWA REVENUE SUMMARY EXISTING AND PROPOSED MIRRORING METHODOLOGY

EXISTING REVENUES

PROPOSED REVENUES

RATE CATEGORY	FL Rates		FCC Rates	Difference	Year 1	Year 2		Year 3
CARRIER COMMON LINE	\$ 90,247,839	\$	-	\$ (90,247,839)	\$ 35,671,050	\$ -	\$	-
LOCAL CHANNEL/ENTRANCE FACILITY	\$ 21,397,758	\$	19,473,405	\$ (1,924,353)	\$ 21,397,758	\$ 19,473,405	\$	19,473,405
SWITCHED COMMON TRANSPORT	\$ 5,800,479	\$	5,031,888	\$ (768,592)	\$ 5,800,479	\$ 5,031,888	\$	5,031,888
ACCESS TANDEM SWITCHING	\$ 8,740,923	\$	10,302,280	\$ 1,561,356	\$ 8,740,923	\$ 10,302,280	\$	10,302,280
INTERCONNECTION CHARGE	\$ -	\$	-	\$ -	\$ -	\$ -	\$	-
SIGNALING	\$ 1,903,867	\$	1,903,867	\$ -	\$ 1,903,867	\$ 1,903,867	\$	1,903,867
INFORMATION SURCHARGE	\$ -	\$	-	\$ -	\$ -	\$ -	\$	-
LOCAL SWITCHING	\$ 66,693,003	\$	21,630,458	\$ (45,062,545)	\$ 66,693,003	\$ 55,740,951	\$	21,630,458
TOTAL	\$ 194,783,869	\$	58,341,897	\$ (136,441,972)	\$ 140,207,080	\$ 92,452,390	\$	58,341,897
REVENUE REDUCTION					\$ (54,576,789)	\$ (47,754,690)	\$	(34,110,493)
LOCAL SWITCHING MINUTES	6,929,501,020	6	,929,501,020				(6,929,501,020
COMPOSITE RATE PER MOU	\$ 0.028109	\$	0.008419				\$	0.008419
COMPOSITE RATE (Orig + Term)	\$ 0.056219	\$	0.016839				\$	0.016839

Notes:

- 1. Total Revenue Reduction based on FCC rates as of 1-1-03 and FL Rates of 9-26-03.
- 2. Annual Revenue Reductions are: Year 1 40 percent, Year 2 35 percent, Year 3 25 percent.
- 3. Local Switching minutes are 12 months through 6-30-03.

Switched Access Charges

Interstate Premium Rates*

BellSouth Telecommunications, Inc.

(As of 1/01/03)

Carrier Common Line	Originating \$0.000000	Terminating \$0.0000000
Cuitabad Transport**	7	·
Switched Transport** Local Channel/Entrance Facility	\$0.0003800	\$0.0003800
Switched Common Transport	\$0.0004060	\$0.0004060
Access Tandem Switching	\$0.0011770	\$0.0011770
Interconnection Charges	\$0.000000	\$0.0000000
Information Surcharge	\$0.0000000	\$0.0000000
End Office		
Local Switching	\$0.0021580	\$0.0021580
Common End Office Trunk Port per MOU	\$0.0008000	\$0.0008000
Feature Group D Access per Minute: Total	\$0.004921	\$0.004921
ORIGINATING + TERMINATING ACCESS:	\$0.0098	

	¥ j

Rates shown are those actually billed and, thus, exclude long term support. Numbers may not appear
to add correctly because the total number is rounded to 4 decimal places.

^{**} Switched Common Transport calculation:

<u>Local Channel/Entrance Facility - Zone 1</u> DS1: Per System (monthly)	\$	121.57
Estimated MOU Equivalent	\$	0.0003800
Switched Common Transport - Zone 1 (SCT) Facility (MOU/airline mile) Termination (MOU/term)	\$ \$	0.0000230 0.0001760
SCT - Interoffice Channel	\$	0.0004060

Local Channel/Entrance Facility and SCT rates are for Zone 1 and first system, if applicable.

Local Channel/Entrance Facility = (DS1 monthly charge)/(24 voice grade equivalents*13,330 MOU)

SCT Interoffice Channel = (SCT Termination + (10 miles * SCT Facility))

Switched Access Charges

Florida Intrastate Premium Rates*
Table 2

BellSouth Telecommunications, Inc.

(Current)

	Originating	<u>Terminating</u>
Carrier Common Line	\$0.0078590	\$0.0158470
Switched Transport**		
Local Channel/Entrance Facility	\$0.0004183	\$0.0004183
Switched Common Transport	\$0.0007600	\$0.0007600
Access Tandem Switching	\$0.0005000	\$0.0005000
Interconnection Charges	\$0.0000000	\$0.0000000
Information Surcharge	\$0.0000000	\$0.0000000
End Office		
Local Switching	\$0.0086610	\$0.0086610
Common End Office Trunk Port per MOU	\$0.0008000	\$0.0008000
Feature Group D Access per Minute: Total	\$0.018998	\$0.026986
ORIGINATING + TERMINATING ACCESS:	\$0.0460	

^{*} Rates shown are those actually billed and, thus, exclude long term support. Numbers may not appear to add correctly because the total number is rounded to 4 decimal places.

^{**} Switched Common Transport calculation:

Local Channel/Entrance Facility - Zone 1 DS1: Per System (monthly)	\$	133.81
Estimated MOU Equivalent	\$	0.0004183
Switched Common Transport - Zone 1 (SCT) Facility (MOU/airline mile) Termination (MOU/term)	\$ \$	0.0000400 0.0003600
SCT - Interoffice Channel	\$	0.0007600

Local Channel/Entrance Facility and SCT rates are for Zone 1 and first system, if applicable.

Local Channel/Entrance Facility = (DS1 monthly charge)/(24 voice grade equivalents*13,330 MOU)

SCT Interoffice Channel = (SCT Termination + (10 miles * SCT Facility))

TYPICAL NETWORK METHODOLOGY INTRASTATE - INTERSTATE RATE COMPARISON AND REVENUE REDUCTION

FL Composite Rate (Orig + Term)	\$	0.0459845
FCC Composite Rate (Orig + Term)	\$	0.0098420
Composite Rate Difference (Orig + Term)	\$	0.0361425
Composite Rate Difference per MOU	\$	0.0180713
Local Switching Minutes	6,9	929,501,020
Total Access Revenue Reduction	\$ 1	25,224,812

SWA REVENUE REDUCTION RATE ELEMENT DETAIL MIRRORING AND TYPICAL NETWORK METHODOLOGIES

				YEAR 1		YE	AR 2	YEAR 3			
METHODOLOGY	RATE ELEMENT	DEMAND (MINUTES)	EXISTING RATE	PROPOSED RATE	REVENUE REDUCTION	PROPOSED RATE	REVENUE REDUCTION	PROPOSED RATE	REVENUE REDUCTION		
MIRRORING	CARRIER COMMON LINE - ORIG CARRIER COMMON LINE - TERM LOCAL SWITCHING TOTAL	2,405,982,988 4,501,749,126 6,929,501,020	\$ 0.015847	\$ 0.007924	1	\$ - \$ 0.006917	\$ (35,671,050) \$ (12,083,640) \$ (47,754,690)	\$ 0.001995	\$ - \$ - \$ (34,110,493) \$ (34,110,493)		
TYPICAL NETWORK	CARRIER COMMON LINE - ORIG CARRIER COMMON LINE - TERM LOCAL SWITCHING	2,405,982,988 4,501,749,126 6,929,501,020	\$ 0.015847	\$ 0.008921		\$ - \$ 0.008131	\$ (40,157,914) \$ (3,670,770) \$ (43,828,684)	\$ 0.003613	\$ - \$ (31,306,203) \$ (31,306,203)		

Notes:

- 1. Total Revenue Reduction based on FCC rates as of 1-1-03 and FL Rates of 9-26-03.
- 2. Annual Revenue Reductions are: Year 1 40 percent, Year 2 35 percent, Year 3 25 percent.
- 3. Demand (Minutes) are 12 months through 6-30-03.