

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **REBUTTAL TESTIMONY**

3 **OF**

4 **KENT W. DICKERSON**

5
6 **Q. Please state your name, occupation and business address.**

7 **A. My name is Kent W. Dickerson. I am employed as Director-Cost Support for**
8 **Sprint/United Management Company, 6450 Sprint Parkway, Overland Park, Kansas**
9 **66251.**

10
11 **Q. Are you the same Kent W. Dickerson who filed direct testimony in this case on**
12 **behalf of Sprint-Florida?**

13 **A. Yes.**

14
15 **Q. What is the purpose of your rebuttal testimony?**

16 **A. The purpose of my rebuttal testimony is to respond to the Direct Testimony of Dr.**
17 **David J. Gabel filed on behalf of The Office of Public Counsel (OPC). Specifically I**
18 **will explain why Dr. Gabel's criticisms of Sprint-Florida's TSLRIC studies are invalid**
19 **and/or immaterial.**

20
21 **Q. Beginning at page 11 of his Direct Testimony, Dr. Gabel characterizes all three**
22 **ILEC (Sprint, BellSouth and Verizon) Total Service Long Run Incremental Cost**
23 **(TSLRIC) studies for Residential (R1) and Single Line Business (B1) Basic Local**
24 **Telephone Service (BLTS) as inappropriate due to what he claims is use of a**
25 **TELRIC cost methodology. Do you agree with Dr. Gabel's characterization of**

1 **the Sprint-Florida TSLRIC studies for Residential and Single-Line Business as**
2 **TELRIC costs?**

3 **A.** No, I do not. As I explained in my direct testimony, the starting point for determining
4 the direct cost network components of BLTS is Sprint's recently approved TELRIC
5 studies for the direct incremental cost network elements of Loop, Local Switching and
6 Transport. However Dr. Gabel's criticism ignores several important adjustments that
7 were included in Sprint's TSLRIC studies and explained in my Direct Testimony.

8

9 **Q. Why did Sprint use the Commission approved UNE loop, Local Switching and**
10 **Transport cost studies as the starting point for estimating the forward looking**
11 **cost of these same network element costs in the BLTS R1 and B1 studies?**

12 **A.** I used this approach primarily because the recent vintage of those network element
13 cost analyses allows the Commission to avoid a laborious and redundant review of the
14 literally hundreds of Commission-approved cost study inputs used in those network
15 element cost estimates. Stated simply, the forwarding looking costs of engineering and
16 constructing the loop, switching and transport network within Sprint-Florida's serving
17 area necessary to provision either 2-wire UNE loops and voice grade switch ports, or
18 for use in provisioning voice grade switched retail services such as BLTS R1 and B1
19 has not changed appreciably since January 2003 (the date of the Commission order
20 approving Sprint's UNE loop, switching and transport cost studies and associated
21 prices - see Order No. PSC-03-0058-FOF-TP, Docket No. 990649B-TP).

22

23 **Q. Are there any technical differences between the reconstructed network**
24 **underlying Sprint's UNE-P voice grade 2-wire loops, switch ports and transport**
25 **UNE-P prices reviewed and approved by the Commission in Docket No.**

1 **990649B-TP and the network necessary to provide BLTS?**

2 **A.** No, there are not, and there-in lies the simple truth supporting Sprint-Florida's straight-
3 forward approach to addressing the loop, switching and transport network components
4 of the TSLRIC studies. They make up the same end-to-end network and thus quite
5 clearly and logically require the same forward-looking engineering standards, vendor
6 costs and labor to construct and maintain.

7

8 **Q.** **What specific disagreement does Dr. Gabel express with Sprint's BLTS TSLRIC**
9 **results?**

10 **A.** Dr. Gabel expresses a generic concern that the TSLRIC studies have included costs
11 which he characterizes as costs shared across multiple services. He thus argues that
12 these costs should be excluded from TSLRIC results. Specifically, Dr. Gabel cites the
13 loop cost components of trenching, conduit, poles, cable placement and Digital Loop
14 Carrier (DLC) equipment as shared costs to be excluded in a TSLRIC study of BLTS.

15

16 **Q.** **Do you agree with Dr. Gabel's concerns?**

17 **A.** No, I do not. TSLRIC by definition includes all direct incremental costs necessary to
18 provide the entire volume of the product or service being examined. Every unit of
19 BLTS R1 or B1 service requires the use of a voice grade loop pair in order to function.
20 This simple, undeniable fact demonstrates the direct cost relationship of loop cable
21 pairs in the BLTS TSLRIC analysis. While Dr. Gabel indicates his disagreement with
22 this reality, he does not directly argue to exclude the entire loop cost, but rather seeks
23 now to remove numerous direct cost components of a loop which total approximately
24 50 percent of the total loop cost.

25

1 **Q. Has the Florida Commission previously addressed this issue?**

2 **A.** Yes. In its February 1999 "Report on the Relationship of the Costs and Charges of
3 Various Services Provided by Local Exchange Companies and Conclusions as to the
4 Fair and Reasonable Florida Residential-Basic Local Telecommunications Service
5 Rate" the Commission concluded at page 51 of Chapter III, "Given such an
6 identification of the cost object to be studied, the principle of cost causation leads one
7 to the unavoidable conclusion that the decision to have local service leads to the
8 incurrence of loop costs." Consequently, at page 10 of the Executive Summary, the
9 Commission stated, "It is the Commission's position that the cost of local loop
10 facilities is properly attributable to the provision of basic local telecommunications
11 service." Thus, while Dr. Gabel indicates his disagreement with this foregone
12 conclusion, he is forced in this case to adjust his core argument to now focus on
13 specific direct cost components of the loop cost which the Commission has already
14 determined to be a direct cost of BLTS.

15
16 **Q. At page 29 of his testimony Dr. Gabel makes a brief acknowledgement of this
17 Commission decision, but then goes on to characterize the Florida Statute's
18 definition of BLTS to include a wider range of services. Is Dr. Gabel's
19 characterization correct?**

20 **A.** No it is not. Section 364.02(2), Florida Statutes, defines BLTS as "voice-grade, flat-
21 rate residential and flat-rate single-line business local exchange services which
22 provide dial tone, local usage necessary to place unlimited calls within a local
23 exchange area, dual tone multi-frequency dialing, and access to the following:
24 emergency services such as "911", all locally available interexchange companies,
25 directory assistance, operator services, relay services, and an alphabetical directory

1 listing.” However, requiring access to additional services does not equate to including
2 those additional services within the definition of "basic service." This is easily
3 demonstrated by the separate and distinct charges for operator services, DA and
4 interexchange services. Thus Dr. Gabel’s testimony, which misconstrues the context
5 of the Commission’s decision as being applicable to a multitude of services, is shown
6 to be in error.

7
8 **Q. Has the Florida Commission also previously addressed the subject of the**
9 **TSLRIC of a network element e.g. a loop?**

10 **A.** Yes.- The Commission’s conclusions regarding the use of TSLRIC for costing a
11 network element directly contradicts Dr. Gabel’s views and arguments. In its decision
12 in the BellSouth/ATT/MCI Arbitration PSC-96-1579-FOF-TP the Commission
13 concluded as follows: “The TSLRIC based forward-looking approach considers the
14 current architecture and the future replacement technology. Upon consideration, we do
15 not believe there is a substantial difference between the TSLRIC cost of a network
16 element and the TELRIC cost of a network element.”

17
18 Dr. Gabel’s 50 percent decrease to the loop cost network element of BLTS via
19 removal of the trenching, conduit, poles, cable placement and DLC equipment loop
20 cost components constitutes a substantial difference between the TSLRIC of a network
21 element and the TELRIC of a network element.

22
23 **Q. Do you consider the trenching, conduit, poles, cable placement and DLC**
24 **equipment loop cost components to be direct costs of a loop and thus a direct cost**
25 **of BLTS requiring that loop?**

1 **A.** Yes, the direct cost relationship is abundantly evident and naturally follows from the
2 Commission's conclusions regarding the direct cost relationship of the entire loop to
3 BLTS TSLRIC. This fact is easily demonstrated via the reality that never has a unit of
4 BLTS been sold without an associated loop, and never has a loop been deployed
5 without the underlying costs of trenching, conduit, poles, cable placement and DLC
6 equipment costs (the latter for those loops requiring DLC only). It is physically
7 impossible to deploy a loop without incurring these direct cost components of a loop.

8

9 **Q.** **At page 18 of his testimony Dr. Gabel references a white paper he authored in**
10 **December of 1996. Do you agree with Dr. Gabel's assertion that the white paper**
11 **provides evidence of overstatement in Sprint's BLTS R1 TSLRIC study?**

12 **A.** No I do not. Actually, this seven year old work serves to support the validity of
13 Sprint's TSLRIC study. I would first point out, however, that the model Dr. Gabel
14 discusses in his 1996 white paper is the substantially improved BCM2, not the BCM
15 that he references in his direct testimony. It is important to note that Dr. Gabel's
16 alleged 50 percent difference to the ILEC TSLRIC studies was derived only after he
17 excluded dramatic amounts of the direct cost of constructing loops. This exclusion of
18 costs is based on a purely hypothetical construct that the network had already been
19 built to serve business customers. By so doing, Dr. Gabel attributes only incremental
20 cable pair costs to residential customers.

21

22 Dr. Gabel's reliance upon the BCM2 model which has been superseded by some 7
23 subsequent model releases to validate his approach is totally misplaced. Even though
24 I don't agree that his approach can be in any way validated, it is worth noting that the
25 BCM2 does not validate Dr. Gabel's approach. For illustrative purposes, I have

1 prepared Exhibit KWD-3, which shows the BCM2 results for Sprint-Florida using the
2 national default BCM2 inputs. The Sprint-Florida BCM2 results generated in 1996,
3 using national default model inputs, is \$29.15 which compares quite favorably with
4 Sprint's BLTS R1 TSLRIC study result of \$30.46.

5
6 **Q. Are Dr. Gabel's urgings to ignore substantial direct costs of constructing loops in**
7 **this docket consistent with his views seven years ago as written in his referenced**
8 **white paper?**

9 **A.** Yes. The executive summary to Dr. Gabel's paper reads "The total service long-run
10 incremental cost of residential service is the cost of adding residential service to a
11 network that *already* provides business services, including both switched business and
12 private line services." "In such localities, the TSLRIC of residential service should
13 include *only* the incremental expense of additional pairs of cable and should not
14 include the fixed cost per foot of installing the cable."

15
16 **Q. Does Dr. Gabel's theoretical construct of adding residential customers to a**
17 **network that already exists for switched business and private line services**
18 **support his exclusion of trenching, conduit, poles, cable placement and DLCs?**

19 **A.** No, even using the never-seen-in-the-real-world construct of an existing network
20 "already in place serving business customers only, the alleged avoided construction
21 costs to add residential customers to that network would not be avoided. It is an
22 accepted fact, evidenced by the Commission approved plant mix cost study inputs for
23 Sprint-Florida, that 72 percent of the cable in Florida is buried. In the real world,
24 buried cable is generally placed at least 3 feet below the surface and is covered with
25 earth. Thus, adding residential customers to an already-existing, business-only

1 network would require entirely new and incremental costs for engineering, trenching
2 and placing new cables to serve the residential customer locations. Additionally, all of
3 the Feeder/Distribution Interfaces cabinets, and DLC devices would require expansion
4 thereby generating new incremental costs for those necessary loop components.

5
6 The result of following through with Dr. Gabel's misapplied TSLRIC construct would
7 unquestionably be a higher cost for loops serving the Residential customers than the
8 economies depicted in Sprint's TSLRIC results.

9
10 This is intuitively obvious because Sprint's TSLRIC study properly reflects the real-
11 world economies of engineering and constructing loop networks to provision loop
12 capacity for all BLTS customers requiring a loop. Sprint's TSLRIC study, on the other
13 hand, avoids the costly rework and duplicative engineering, trenching and placing of
14 cables, as well as the FDIs and DLCs expansions, that would be necessary in Dr.
15 Gabel's theoretical-but-never-seen overlay construction to serve residential customers
16 on a hypothetical existing business customer only loop network.

17
18 **Q. If Dr. Gabel modified his hypothetical approach to TSLRIC to acknowledge**
19 **simultaneous construction of loop network to serve all BLTS customer locations**
20 **would that then support his 50 percent reductions?**

21 **A.** No it would not. Given his use of and reference to his historic white paper in his direct
22 testimony it is unclear as to the degree to which Dr. Gabel intends to advance his
23 hypothetical TSLRIC application in the direction of this reality. However, even
24 assuming he now concedes this reality, the existence of 1,048,000 residential customer
25 locations compared with 182,000 business customer locations for Sprint-Florida, leads

1 to the indisputable conclusion that an absolute minimum of 866,000 residential
2 customer locations (6 fold increase!) require dedicated distribution cable, drop
3 terminals and drop construction. Many of these locations also require dedicated sub-
4 feeder, FDI and DLC equipment as well. Although in obvious conflict to his proposed
5 50 percent reduction in Sprint's TSLRIC results, Dr. Gabel has acknowledged this
6 reality in his 1996 white paper which contains the following footnote on page 7
7 "Where the cable is used to serve *only* residential customers, the placement cost for
8 the cable is part of the incremental cost of serving residential customers. Further, if the
9 cable is *shared* by residential customers and business customers, and the capacity of
10 the cable is exhausted, the cost of installing the cable is part of the incremental cost of
11 serving residential customers."
12

13 **Q. If the TSLRIC methodology assumes that the loop network to serve BLTS**
14 **business and residential customers is engineered and constructed simultaneously**
15 **what is the result?**

16 **A.** The result is exactly as depicted in Sprint-Florida's TSLRIC study. Sprint's study
17 depicts the maximum attainable unit cost economies of constructing loop plant to
18 serve all BLTS customer locations requiring 2-wire voice grade cable pairs.
19

20 **Q. Does Dr. Gabel's "brand" of TSLRIC also conflict with your experience,**
21 **application and knowledge of TSLRIC in other State and Federal cost work you**
22 **have performed or observed?**

23 **A.** Yes it does. Perhaps the most glaring example of how Dr. Gabel's views regarding
24 loop costs conflict with main stream TSLRIC applications is evidenced by it's stark
25 contrast with the FCC's cost estimation model and process used in conjunction with

1 Federal Universal Service Fund (USF) program. The FCC's USF program uses the
2 Hybrid Cost Proxy Model (HCPM) to estimate the forward-looking cost of BLTS, and
3 unquestionably includes the entire cost of the loop in its BLTS cost estimates. I have
4 also worked directly with the USF programs at a state level in Texas, Kansas, and
5 Wyoming and all include 100 percent of the loop network element in their forward-
6 looking BLTS cost estimates.

7

8 **Q. Can you suggest a more current BLTS TSLRIC benchmark tool for this**
9 **Commission than the 8 year old, substainly superseded BCM2 used by Dr.**
10 **Gabel?**

11 **A.** Yes, I can. The aforementioned FCC HCPM used to estimate the forward-looking cost
12 of BLTS in association with the Federal USF program is instructive and readily
13 available. I have prepared Exhibit KWD-4 which shows the BLTS TSLRIC results for
14 Sprint-Florida's serving area using the HCPM.

15

16 Use of HCPM and the Commission approved Florida-specific inputs from the most
17 recent pricing proceeding, UNE Docket No. 990649-TP yields a forward-looking cost
18 estimate for Sprint-Florida's BLTS of \$34.72 (see Exhibit KWD-4), thus providing yet
19 another objective validation of Sprint's \$30.46 BLTS R1 TSLRIC study result.

20

21 **Q. At page 21 of his testimony Dr. Gabel expresses concern for the use of the same**
22 **retail cost figure within Sprint-Florida's TSLRIC studies for both BLTS R1 and**
23 **B1. Do you believe his concern constitutes a material flaw in Sprint-Florida's**
24 **TSLRIC analyses?**

25 **A.** No I do not. I agree with Dr. Gabel that the exact retail costs (marketing, sales,

1 product development) could likely be shown to be precisely different between R1 and
2 B1 service, were one to undertake the effort of a service specific retail cost analysis.
3 However, I would not expect that any such additional study effort would materially
4 affect the overall study results. Thus I view it as an uneconomic trade-off between
5 labor costs to pursue this refinement measured against it's potential impact on the
6 overall TSLRIC study results. Most importantly, there is no likelihood that a more
7 precise matching of service specific retail costs would alter the conclusion supported
8 by Exhibit JMF-3 to Sprint Witness Mr. Felz's direct testimony which shows the
9 current R1 prices to be (\$13.96) below cost. The (\$13.96) is computed using an R1
10 retail cost of \$3.03 and thus the retail costs could be zeroed out and still provide the
11 same dramatic demonstration of cost exceeding price for R1 service.

12

13 **Q. Does this conclude your testimony?**

14 **A. Yes.**

15

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25

State: Florida

Date: 6/23/96
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Aggregate Support	ARMIS
At \$20 = \$	691,572,138
At \$30 = \$	238,882,332
At \$40 = \$	98,309,431
At \$50 = \$	46,047,224
At \$60 = \$	20,927,594
At \$70 = \$	10,654,404
At \$80 = \$	6,289,819
Annual Benchmark Cost = \$	3,171,236,561
State Average Monthly Cost = \$	29.15

Density	Households	Lines
Less 5	6,020	9,043
5 to 200	783,465	1,288,382
200 to 650	801,833	1,511,055
650 to 850	338,375	586,892
850 to 2550	2,185,343	3,877,632
Greater 2550	1,023,324	1,793,992
Total	5,138,360	9,066,997

Cost Category	ARMIS
	Households
\$0<=\$ 5	-
\$5<=\$10	-
\$10<=\$15	9,982
\$15<=\$20	257,051
\$20<=\$25	990,787
\$25<=\$30	1,633,560
\$30<=\$35	1,191,285
\$35<=\$40	455,458
\$40<=\$45	170,159
\$45<=\$50	116,612
\$50<=\$55	107,631
\$55<=\$60	71,306
\$60<=\$65	52,891
\$65<=\$70	30,235
\$70<=\$75	17,994
\$75<=\$100	23,879
\$100<=\$150	8,682
\$150<=\$200	404
\$200<=\$250	444
\$250<=\$300	-
\$300<=\$500	-
\$500<=\$1000	-
\$1000+	-
Total Households	5,138,360

Loop Category	Households
0 <= 5Kft	274,278
5Kft <= 10Kft	1,116,341
10Kft <= 15Kft	1,189,903
15Kft <= 20Kft	857,092
20Kft <= 25Kft	496,021
25Kft <= 30Kft	353,208
30Kft <= 40Kft	400,755
40Kft <= 50Kft	213,246
50Kft <= 60Kft	107,672
60Kft <= 70Kft	56,977
70Kft <= 80Kft	24,257
80Kft <= 90Kft	14,825
90Kft <= 100Kft	13,351
100Kft <= 150Kft	18,814
150Kft <= 200Kft	1,620
200Kft+	-

Loop Information	Length
Minimum Loop Length	575
Maximum Loop Length	207,443
Average Loop Length	18,487

Maximum Monthly Cost	\$ 209.89
Average Monthly Cost	\$ 29.15
Lines Above \$10K Loop Inv	803

	A	B	C	D
1	HCPM Cost of Service Comparison			
2	Sprint Florida, Inc. Settings and Inputs	\$ 34.72		
3				
4				
5	List of Inputs Changed to reflect inputs used in Docket No. 990649B-TP:			
6	Distance Limit			
7	Max copper distance			
8	24 and 26 Gauge Distribution copper cable costs			
9	24 and 26 Gauge Feeder copper cable costs			
10	Fiber Cable Costs			
11	Distribution, Copper Feeder, and Fiber Plant Mixes			
12	Drop Terminal Costs			
13	FDI Costs			
14	Fill Factors			
15	Normal, Soft, and Hardrock Terrain Costs			
16	Manhole Costs			
17	Structure Sharing			
18	Cost per drop			
19	NID Costs			
20	Duct costs			
21	DLC costs			
22	Cost of Capital Inputs			
23	Economic Lives and Net Salvage percent			
24	Per Line variable overhead			

	A	B	C
1	HCPM Wirecenter Summary		
2			
3	HCPM Sprint Specific Settings and Inputs		
4	Column from HCPM Investment Inputs tab		
5	A	IC	ID
6	Sprint Inputs less HCPM Default	Total Monthly Cost per Line	Total Switched Lines
7	ALFRFLXA	\$ 120.89	1,645
8	ALSPFLXA	\$ 24.46	61,207
9	ALVAFLXA	\$ 38.32	1,993
10	APPKFLXA	\$ 29.16	38,164
11	ARCDFLXA	\$ 55.04	12,991
12	ASTRFLXA	\$ 69.24	1,196
13	AVPKFLXA	\$ 38.49	12,786
14	BAKRFLXA	\$ 111.49	2,735
15	BCGRFLXA	\$ 75.67	445
16	BLVWFLXA	\$ 41.93	21,909
17	BNFYFLXA	\$ 68.48	6,796
18	BNSPFLXA	\$ 32.58	28,930
19	BSHNFLXA	\$ 71.84	7,986
20	BVHLFLXA	\$ 38.71	12,685
21	BWLGFLXA	\$ 79.45	1,291
22	CFVLFLXA	\$ 86.03	4,680
23	CHLKFLXA	\$ 165.59	1,624
24	CHSWFLXA	\$ 45.65	3,885
25	CLMTFLXA	\$ 41.97	12,304
26	CLTNFLXA	\$ 45.55	9,440
27	CPCRFLXA	\$ 28.83	32,321
28	CPCRFLXB	\$ 30.60	28,737
29	CPHZFLXA	\$ 40.33	9,977
30	CRRVFLXA	\$ 37.67	15,940
31	CRVWFLXA	\$ 34.44	20,264
32	CSLBFLXA	\$ 27.24	24,337
33	CTDLFLXA	\$ 102.69	1,178
34	CYLKFLXA	\$ 27.14	37,938
35	CYLKFLXB	\$ 30.44	9,600
36	DDCYFLXA	\$ 37.45	13,120
37	DESTFLXA	\$ 24.10	13,863
38	DFSPFLXA	\$ 58.72	9,254
39	ESTSFLXA	\$ 32.35	17,030
40	EVRGFLXA	\$ 236.76	725
41	FRPTFLXA	\$ 109.30	2,413
42	FTMBFLXA	\$ 26.94	11,857
43	FTMDFLXA	\$ 54.67	3,729
44	FTMYFLXA	\$ 23.49	26,323
45	FTMYFLXB	\$ 33.58	18,806
46	FTMYFLXC	\$ 24.35	38,206
47	FTWBFLXA	\$ 23.81	28,799

	A	B	C
1	HCPM Wirecenter Summary		
2			
3	HCPM Sprint Specific Settings and Inputs		
4	Column from HCPM Investment Inputs tab		
5	A	IC	ID
6	Sprint Inputs less HCPM Default	Total Monthly Cost per Line	Total Switched Lines
48	FTWBFLXB	\$ 26.66	28,659
49	FTWBFLXC	\$ 32.40	3,830
50	GDRGFLXA	\$ 99.84	1,594
51	GLDLFLXA	\$ 201.14	660
52	GLGCFLXA	\$ 38.72	23,658
53	GLRDFLXA	\$ 25.87	56,475
54	GNVFLXA	\$ 218.58	1,149
55	GNWDFLXA	\$ 143.60	1,412
56	GVLDFLXA	\$ 58.17	5,215
57	HMSPLXA	\$ 41.59	9,782
58	HOWYFLXA	\$ 50.23	1,862
59	IMKLFLXA	\$ 45.98	5,910
60	INVRFLXA	\$ 38.35	31,342
61	IONAFLXA	\$ 28.31	14,665
62	KGLKFLXA	\$ 340.19	265
63	KNVFLXA	\$ 332.30	378
64	KSSMFLXA	\$ 29.19	48,292
65	KSSMFLXB	\$ 30.57	18,951
66	KSSMFLXD	\$ 30.79	12,948
67	LBLLFLXA	\$ 78.15	7,064
68	LDLKFLXA	\$ 35.63	17,156
69	LEE_FLXA	\$ 194.15	1,030
70	LHACFLXA	\$ 37.42	18,578
71	LKBRFLXA	\$ 24.96	48,595
72	LKHLFLXA	\$ 47.65	1,814
73	LKPCFLXA	\$ 52.46	12,511
74	LSBGFLXA	\$ 31.23	39,472
75	LWTYFLXA	\$ 127.43	1,299
76	MALNFLXA	\$ 124.22	1,307
77	MDSNFLXA	\$ 44.14	4,844
78	MNTIFLXA	\$ 91.43	6,443
79	MOISFLXA	\$ 27.90	18,091
80	MRDCFLXA	\$ 23.85	2,812
81	MRHNFLXA	\$ 86.46	1,495
82	MRNNFLXA	\$ 41.16	13,842
83	MTDRFLXA	\$ 36.71	16,190
84	MTVRFLXA	\$ 46.26	1,286
85	NFMYFLXA	\$ 28.26	20,630
86	NFMYFLXB	\$ 34.43	18,992
87	NNPLFLXA	\$ 27.40	36,937
88	NPLSFLXC	\$ 35.39	36,192

	A	B	C
1	HCPM Wirecenter Summary		
2			
3	HCPM Sprint Specific Settings and Inputs		
4	Column from HCPM Investment Inputs tab		
5	A	IC	ID
6	Sprint Inputs less HCPM Default	Total Monthly Cost per Line	Total Switched Lines
89	NPLSFLXD	\$ 25.35	58,156
90	OCALFLXA	\$ 30.48	60,038
91	OCALFLXB	\$ 35.86	25,756
92	OCALFLXC	\$ 27.33	8,411
93	OCALFLXJ	\$ 28.16	4,671
94	OCNFFLXA	\$ 55.02	6,057
95	OKCBFLXA	\$ 56.09	20,424
96	OKLWFLXA	\$ 47.15	2,798
97	ORCYFLXA	\$ 28.95	13,008
98	ORCYFLXC	\$ 33.02	16,425
99	PANCFLXA	\$ 97.77	1,208
100	PNGRFLXA	\$ 39.50	25,677
101	PNISFLXA	\$ 45.37	7,941
102	PNLNFLXA	\$ 180.38	1,002
103	PTCTFLXA	\$ 31.02	57,796
104	RYHLFLXA	\$ 159.01	972
105	SBNGFLXA	\$ 34.10	27,203
106	SCPKFLXA	\$ 33.20	11,839
107	SGBHFLXA	\$ 74.69	1,521
108	SHLMFLXA	\$ 26.36	11,338
109	SLHLFLXA	\$ 52.85	5,390
110	SNANFLXA	\$ 72.47	2,619
111	SNDSFLXA	\$ 73.63	1,801
112	SNISFLXA	\$ 31.12	9,468
113	SNRSFLXA	\$ 38.01	6,587
114	SPCPFLXA	\$ 178.35	799
115	SSPRFLXA	\$ 68.82	1,327
116	STCDFLXA	\$ 44.59	22,360
117	STMKFLXA	\$ 176.88	421
118	STRKFLXA	\$ 45.96	9,550
119	SVSPFLXA	\$ 40.05	6,305
120	SVSSFLXA	\$ 34.10	7,960
121	TLCHFLXA	\$ 51.46	4,228
122	TLHSFLXA	\$ 21.20	39,974
123	TLHSFLXB	\$ 25.18	27,888
124	TLHSFLXC	\$ 29.15	34,589
125	TLHSFLXD	\$ 28.22	54,685
126	TLHSFLXF	\$ 35.72	25,720
127	TLHSFLXG	\$ 60.95	4,394
128	TLHSFLXH	\$ 28.04	14,444
129	TVRSFLXA	\$ 31.62	15,346

	A	B	C
1	HCPM Wirecenter Summary		
2			
3	HCPM Sprint Specific Settings and Inputs		
4	Column from HCPM Investment Inputs tab		
5	A	IC	ID
6	Sprint Inputs less HCPM Default	Total Monthly Cost per Line	Total Switched Lines
130	UMTLFLXA	\$ 61.00	8,943
131	VLPRFLXA	\$ 29.66	21,875
132	WCHLFLXA	\$ 62.15	7,018
133	WLSTFLXA	\$ 73.41	5,673
134	WLWDFLXA	\$ 43.80	9,396
135	WNDRFLXA	\$ 33.84	7,153
136	WNGRFLXA	\$ 28.96	25,274
137	WNPKFLXA	\$ 23.00	55,173
138	WSTVFLXA	\$ 230.25	134
139	ZLSPFLXA	\$ 146.60	1,406