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November 19, 2003

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 030869-TL**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Steve Bigelow (proprietary), John Ruscilli (proprietary), Bernard Shell (proprietary exhibit), Dr. Andy Banerjee and Dr. Kenneth Gordon, which we ask that you file in the captioned docket.

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,



Meredith E. Mays (EM)

Enclosure

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

506995

BIGELOW	-	11677-03
RUSCILLI	-	11678-03
SHELL	-	11679-03
BANERJEE	-	11680-03
GORDON	-	11681-03

**CERTIFICATE OF SERVICE**  
**Docket Nos. 030867-TP, 030868, 030869-TL and 030961-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and Federal Express this 19<sup>th</sup> day of November, 2003 to the following:

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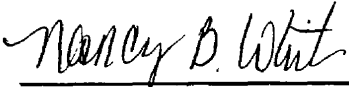
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Nancy B. White (KA)

**(+) Protective Agreement**  
**(\*) Hand Delivered**

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**BELLSOUTH TELECOMMUNICATIONS, INC.**  
**REBUTTAL TESTIMONY OF E. STEVEN BIGELOW**  
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**  
**DOCKET NOS. 030867-TL, 030868-TL, 030869-TL & 030961-TI**  
**NOVEMBER 19, 2003**

**Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.**

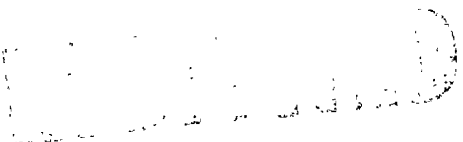
A. My name is E. Steven Bigelow. My business address is 3535 Colonnade Parkway, Birmingham, Alabama. I am a Director in the Pricing Strategy Department of BellSouth Telecommunications, Inc. ("BellSouth"). My area of responsibility is the provision of demand and revenue analysis in support of regulatory filings.

**Q. ARE YOU THE SAME STEVE BIGELOW WHO FILED DIRECT TESTIMONY?**

A. Yes.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to rebut witness Dr. David J. Gabel's calculation of BellSouth's average business rate in Florida and witness Bion C.



1 Ostrander's estimate of the average toll minutes of use for a BellSouth  
2 customer in Florida.

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4 **Q. ON PAGE 29, LINE 1 OF HIS TESTIMONY, DR. GABEL PROVIDES A**  
5 **CALCULATION OF THE AVERAGE REVENUE FOR A BUSINESS**  
6 **LINE IN FLORIDA USING DATA FROM EXHIBIT SB-1. IS THERE A**  
7 **PROBLEM WITH THIS AVERAGE?**

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9 A. Yes. Dr Gabel's calculation is based on the data contained in the original  
10 exhibit SB-1. Prior to re-filing the petition, BellSouth discovered that single  
11 line business demand in Exhibit SB-1 was overstated due to a database error.  
12 This error was corrected in the re-filed Exhibit SB-1. Had Dr. Gabel used the  
13 correct data when he developed his testimony, he would have shown an  
14 average of **begin proprietary** [REDACTED] **end proprietary**. This is composed of  
15 \$6.50 for the SLC and **begin proprietary** [REDACTED] **end proprietary** for the  
16 line.

17

18 **Q. BEGINNING ON PAGE 24, LINE 18 OF HIS TESTIMONY, BION**  
19 **OSTRANDER EXPLAINS HOW HE DETERMINED THE AVERAGE**  
20 **MINUTES OF INTRASTATE TOLL USE PER MONTH FOR A**  
21 **FLORIDA RESIDENTIAL CUSTOMER. IS HIS ESTIMATE OF 44**  
22 **MINUTES REASONABLE TO USE IN CALCULATING THE**  
23 **BENEFITS OF BELL SOUTH'S REBALANCING PROPOSAL?**

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1 A. No. The data provided to the Office of Public Counsel in response to its  
2 Request for Production number 3, included a detailed study on customer  
3 calling patterns in Florida. The April 2003 data BellSouth collected shows that  
4 an average of **begin proprietary** [REDACTED] **end proprietary** minutes of use per  
5 residence account would be a more reasonable estimate. This is composed of  
6 approximately **begin proprietary** [REDACTED] **end proprietary** minutes of BellSouth  
7 intraLATA toll minutes of use and approximately **begin proprietary** [REDACTED] **end**  
8 **proprietary** minutes of intrastate access minutes of use.

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10 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

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12 A. Yes.

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