

REDACTED

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
Page 1 of 1
3/19/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF FCCA's SURREBUTTAL
TESTIMONY OF JOSEPH GILLAN AND EXHIBIT JPG-11,
FILED JANUARY 28, 2004, IN FLORIDA DOCKET NO. 030851-TP**

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of Requirements Arising)
From Federal Communications Commission) **Docket No. 030851-TP**
Triennial UNE Review: Local Circuit Switching For) **Filed: January 28, 2004**
Mass Market Customers)

**SURREBUTTAL TESTIMONY AND EXHIBITS OF
JOSEPH GILLAN
ON BEHALF OF
THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION
(PUBLIC VERSION)**

1 **Q. Please state you name and the party sponsoring your surrebuttal testimony.**

2

3 **A. My name is Joseph Gillan. My surrebuttal testimony is being sponsored by the**
4 **Florida Competitive Carriers Association.**

5

6 **Q. What is the purpose of your surrebuttal testimony?**

7

8 **A. The purpose of my surrebuttal testimony is to address a number of**
9 **arguments raised by BellSouth in its rebuttal testimony, as well as to**
10 **respond to FDN's claim that it is a self-provisioning switch trigger in the**
11 **mass market.**

12

13 **Q. What issues does BellSouth raise in its rebuttal testimony?**

14

15 **A. BellSouth's rebuttal testimony generally raises two new issues:**

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Surrebuttal Testimony of Joseph Gillan
On Behalf of the Florida Competitive Carriers Association

1 As Table 2 above shows, the TELRIC-based SGAT rates for unbundled local
2 switching already cover embedded costs and provide a contribution to BellSouth's
3 joint and common costs (and provide a return) of more than 130%.¹⁸ Moreover,
4 BellSouth's SGAT rates include a voluntary reduction from its Commission-
5 approved UNE-rates (which produce an average revenue of \$8.54 per switch port
6 and a contribution of nearly 160%). There is no basis for BellSouth's claim that
7 it is not being adequately compensated for unbundled local switching in Florida –
8 if anything, its rates exceed just and reasonable levels when judged by its
9 embedded cost.

10

11 **Q. Has BellSouth revealed how much revenue it gets from the switch-related**
12 **charges that it imposes on CLECs in Florida?**

13

14 A. Yes. The Commission should appreciate that when a carrier leases UNE-P, in
15 addition to paying for the loop, the CLEC also pays BellSouth for local switching,
16 shared transport and the billing records it needs to offer service. According to
17 Exhibit No. __ JPG-11 (attached),¹⁹ BellSouth collects (on average) Begin
18 Confidential *** [REDACTED] *** End Confidential per month per UNE-P line.²⁰

19

¹⁸ Contribution is calculated as (Revenues-Expenses)/Expenses.

¹⁹ BellSouth Response to FCCA 2nd Set of Interrogatories, Item No. 24.

²⁰ Although Exhibit No. _____ JPG-11 asked BellSouth to provide only its switch-related revenues, the magnitude of the answer suggests that it also included loop charges.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
FCCA's 2nd Interrogatories
November 10, 2003
Item No. 24
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PROPRIETARY

REQUEST: For the most recent quarter for which the information is available, provide the:

- a. Total number of UNE-P lines in Florida;
- b. Total billed revenues for unbundled local switching, shared transport and any charges for call detail records/access records billed UNE-P carriers in Florida.

RESPONSE: a. 1 As of September 30, 2003, there were [REDACTED] UNE-P lines in
2 Florida.

- b. 3 This information is proprietary and is being provided subject to the
4 terms of the non-disclosure agreement in this proceeding.

5 Total billed revenue for unbundled local switching and shared
6 transport:

7 Jul 2003 [REDACTED]

8 Aug 20003 [REDACTED]

9 Sept 2003 [REDACTED]

10 BellSouth does not have its revenue information broken down to
11 the detail needed to exclude call detail records/access records from
12 other revenues.

RESPONSE PROVIDED BY: Craig Williard
David H. Wood