BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track).	DOCKET NO. 990649B-TP ORDER NO. PSC-03-0058-FOF-TP ISSUED: January 8, 2003

The following Commissioners participated in the disposition of this matter:

LILA A. JABER, Chairman
J. TERRY DEASON
BRAULIO L. BAEZ
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FINAL ORDER ON RATES FOR UNBUNDLED NETWORK ELEMENTS PROVIDED BY SPRINT-FLORIDA INCORPORATED

BY THE COMMISSION:

TABLE OF CONTENTS

ACRONYMS

LIST OF ACRONYMS AND ABBREVIATIONS USED IN THE RECOMMENDATION

AA	Allocation Area
AAIS	Assignment, Activation and Inventory Service System
ACG	Access Carrier Gateway
ACO	Area Central Office
ADSL	Asymmetrical Digital Subscriber Line
AIN	Advanced Intelligent Network
ALEC	Alternative Local Exchange Company
AM	Administrative Module
AO	Account Owner
APC	Assignment Provisioning Center
API	Application Program Interface
ARC	Automated Routing and Completion
ASR	Access Service Request
ATCUP	Automated Tool for CLEC User Profile
ATM	Asynchronous Transfer Mode
ATP	Authorization to Proceed
AT&T	AT&T Communications of the Southern States
AWAS	Automated Work Administration System
B & C	Billing and Collection
BARRA	A financial data firm that provides beta estimates
BEX	Business Express
BFR	Bona Fide Request
BH Table	CLEC line Screening table
BR	Brief
BRI	Basic Rate Interface (i.e., Integrated Services Digital Network - ISDN-BRI)
BRPC	Business Response Provisioning Center
BST or BellSouth	BellSouth Telecommunications, Inc.
BSTLM	BellSouth Telecommunications Loop Model
BT	Building Terminal
BVT	Billing, Voucher, Treatment (System)
BZT	Business Zone Technicians
CABS	Carrier Access Billing System
Caller ID	Caller Identification

CALRA	Centralized Automated Loop Reporting System
CAMS - CABS	Carrier Access Management System - Carrier Access Billing System
CAPM	Capital Asset Pricing Model
CASS	Carrier Access Support System
CBSS	Customer Billing Services System
CBSS CIA	CBSS Customer Information Application
CBSS MIS	CBSS Management Information System
CC	Common Carrier
CCS7	Common Channel Signaling System 7
CDT	CLEC Dedicated Transport
CEV	Controlled Environmental Vault
CFR	Code of Federal Regulations
CKT ID	Circuit Identifier
CLASS	Custom Local Area Signaling Service
CLEC	Competitive Local Exchange Carrier
CLR/DLR	Circuit/Design Layout Reports
CMDS	Centralized Message Distribution System
CMP	Communications Module Processor
CNAM	Calling Name Database Service
CNAS	Circuit Network Administration System
CO	Central Office
CO I&M	Central Office Installation and Maintenance
COMPUSTAT	A financial database
COSS	CLEC Operational Support System
COT	Central Office Technician
CRB	Customer Records and Billing
CSA	Carrier Serving Area
CSI	Customer Service Inquiry
CSO	Customer Service Organization
CSR	Customer Service Record
CZT	Customer Zone Technicians
DA	Directory Assistance or Distribution Area
DAML	Digital Added Main Lines
DBAC	Database Administration Center
DBM	Database Management
DCF	Discounted Cash Flow
DCOP	Dedicated Central Office Plant
DD	Due Date

DGF	Data Gathering Form
DID/DOD	Direct Inward Dialing/Direct Outward Dialing
DLC	Digital Loop Concentrator or Digital Loop Carrier
DLEC	Data Local Exchange Carrier
DLR	Design Layout Record
DN	Docket Number
DRC	Dispatch Resource Center
DRM	Division Resource Management
DSAL	Dedicated Switched Access Lines
DSAT	Dedicated Switched Access Transport
DSL	Digital Subscriber Line
DSLAM	Digital Subscriber Line Access Multiplexer
DSX	Digital System Cross-Connect Frame
DT	Distribution Terminal
D&E	Development of new systems and enhancements to existing systems
d/b/a	Doing business as
EBAC	Equipment Billing Accuracy Center
ECT	Enhanced Copper Technologies
EDI	Electronic Data Interchange
EDS	Electronic Data Systems, Inc.
EDT	Express Dial Tone
EEL	Enhanced Extended Link
EF&I	Engineered, Furnished, and Installed
EIS	Expanded Interconnection Services
EMR	Exchange Message Record
EWO	Engineering Work Order
EXACT/TUF	Exchange Access Control and Tracking/Translation to USOCS and FIDS
EXH	Exhibit
E&I	Engineer and Install
FCC	Federal Communications Commission
FCCA	Florida Competitive Carriers Association
FCTA	Florida Cable Telecommunications Association, Inc.
FDI	Feeder Distribution Interface
FIFO	First In First Out
FITL	Fiber-In-The-Loop
FLEC	Forward-Looking Economic Cost
FDN	Florida Digital Network, Inc.
FOC	Firm Order Confirmation

FPSC	Florida Public Service Commission
FRN	Facility Reservation Number
Ft.	Feet
F.S.	Florida Statutes
GAAP	Generally Accepted Accounting Principles
GIS	Geographic Information System
GOLD	Gathering On Line Data
GTEFL	GTE Florida Incorporated
GTT	Global Title Transactions
HAI model	Formerly Hatfield model
HCPM	Hybrid Cost Proxy Model
HDSL	High Bit-Rate Digital Subscriber Line
IBES	Institutional Brokerage Estimate System
ICB	Individual Case Basis
ICM	Integrated Cost Model
ID	Identification
IDF	Intermediate Distribution Frames
IDLC	Integrated Digital Loop Carrier
IDSL	Integrated Digital Subscriber Line
IDST	Integrated Digital Service Terminal
IDT	Interoffice Dedicated Transport
ILEC	Incumbent Local Exchange Company
INC	Intra-building Network Cable
INP	Interim Number Portability
IOF	Interoffice Facility
IOSC	Item of Service Code
IR	Incident Report
ISDL	Integrated Services Digital Subscriber Line
ISDN	Integrated Services Digital Network
ISUP	Integrated Services User Port
ITDP	Information Technology and Data Processing
IXC	Interexchange carrier
kft	Kilofeet (Also Kft. and kf)
LBSC	Large Business Support Center
LCC	Line Class Code
LC&I PMO	Local Competition and Interconnection Program Office
LEA	Local Service Request Edit Application
LEC	Local Exchange Company

LFACS	Loop Facility Assignment Control System
LIA	Local Service Request Input Application
LIDB	Line Information Database
LIJ	Left-in-Jumper
LLR	Loaded Labor Rate
LMS	Link Monitoring System
LMU	Loop Make-Up
LNP	Local Number Portability
LSC	Local Service Confirmation
LSR	Local Service Request
LST	Line and Station Transfer
L&B	Land and Building
MARK	Mechanized Assignment & Record Keeping system
MDF	Main Distribution Frame
MDTE	Massachusetts Department of Telecommunications and Energy
MDU	Multiple Dwelling Unit
MGC	MGC Communications, Inc.
MLPQ	Mechanized Loop Pre-Qualification
MOG	Mass Order Generator
MOU	Minutes of Use
MPOE	Minimum Point of Entry to the Customer Premises
MRC	Monthly Recurring Charge
MSA	Metropolitan Statistical Area
MSRT	Minimum Spanning Road Tree
MST	Minimum Spanning Tree
MTU	Multi-Tenant Unit
MUTS	Mechanized Uncollectible Tracking System
NACC	National Access Customer Center
NASSC	National Access Subscription Services Center
NCAT	Network Cost Analysis Tool
NCBD	National Customer Bill Development
NEAC	National Exchange Access Center
NGDLC	Next Generation Digital Loop Carrier
NID	Network Interface Device
NMC	National Market Center
NOCV	National Order Collection Vehicle
NOREC	National Order/Referral Entry Center
No.	Number

NRC	Non-Recurring Charge
NRCM	Non-Recurring Cost Model
NTW	Network Terminating Wire
OCS	Other Carrier Systems
OCSS	Other Carrier Settlement Systems
OMT	Open Market Transition
OPC	Originating Point Code
OPSE	Outside Plant Engineering
OSP	Outside Plant
OSS	Operation Support Systems
O&T	One Plus Terminating Usage
PBX	Private Branch Exchange
PCO	Plant Control Office
PIC	Primary Interconnection Carrier
POD	Production of Documents
PON	Purchase Order Number
POP	Point of Presence
POTS	Plain Old Telephone Service
Powerbase	Master Database of Customers fed by CBSS
PRI	Primary Rate Interface
PSC	Public Service Commission
PSE	Plant Specific Expense
PSP	Product Service Provider
PTD	Plant Test Date
QMR	Query Management Report
RAF	Regulatory Assessment Fee
RAO	Revenue Accounting Office
RBHC	Regional Bell Holding Companies
RC	Recurring Charge
RCF	Remote Call Forwarding
RCMAC	Recent Change Mechanized Assignment Center
RDM	Reporting and Distribution Module
RMA	Requiring Manual Intervention
RMG	Resource Management Group
RPMS	Retail PIC Management System
RRD	Revised Resistance Design
RT	Remote Terminal
RTU Fee	Right-To-Use Fee
S&P	Standard & Poor's Industry Survey

SAC	Service Advocacy Center
SAI	Serving Area Interface
SAIC	Science Applications International Corporation
SAR	Service Activation Report
SBC	Southwestern Bell Telephone Company
SCIS	Switching Cost Information System
SCIS/IN	Switching Cost Information System/Intelligent Network
SCIS/MO	Switching Cost Information System/Model Office
SCM	Sprint Switching Cost Model
SCP	Service Control Point
SCR	Selective Carrier Routing
SDSL	Symmetric Digital Subscriber Line
SEC	Securities and Exchange Commission
SE&P	Supporting Equipment and Power Loadings
SI	Service Inquiry
SIGS	Secure Integrated Gateway System
SIR	Systems Information Repository database
SL	Service Level
SLCM	Sprint Loop Cost Model
SM	Switch Module
SMEs	Subject Matter Experts
SMS	Service Management System or Switch Modules
SODA/DDM	Service Order Distribution and Analysis/Due Date Management system
SOE	Service Order Entry System
SONET	Synchronous Optical Network
SOP	Service Order Processor
SORCES	Service Office Record and Computer Entry System
SPAG	Special Products Assignment Group
Sprint	Sprint-Florida, Incorporated
SRT	Service Readiness Testing
SS	Subscription Services
SS7	Signaling System 7
SSI&M	Special Services Installation & Management
STAR	Standard Time and Activity Reporting
STI	Standard Time Increment
STP	Signaling Transfer Point
SWC	Serving Wire Centers
TAS	Trouble Administration System

TBS	Telecom Business Systems
TCAP	Transaction Capabilities Application Part
TCM	Sprint Transport Cost Model
TDO	Temporary Disconnect Order
TFC	Toll-Free Code
TELRIC	Total Element Long-Run Incremental Cost
TFP	Total Factor Productivity
TN	Telephone Number
TNM	Total Network Management
TPI	Telephone Plant Index
TR	Transcript
TSLRIC	Total Service Long-Run Incremental Costs
UCL	Unbundled Copper Loop
UDC	Universal Digital Channel
UDF	Unbundled Dark Fiber
UDLC	Universal Digital Loop Carrier
UL	Unbundled Loop
UMS	Usage Measurement System
UNE	Unbundled Network Element
UNE-P	Unbundled Network Element-Platform
USF	Universal Service Fund
USL-D	Sub-Loop Distribution
USL-F	Sub-Loop Feeder
USLC	Unbundled Subloop Concentration
USOA	Uniform System of Accounts
USTA	United States Telephone Association
Verizon	Formerly GTE Florida Incorporated
Verizon NS	Verizon Network Services
VerizonLD	Verizon Long Distance
VFAC	Virtual Facilities Assignment Center
VG	Voice Grade
WCC	Work Control Center
WDA	Work Distributor Application
WEFA	Wharton Econometric Forecasting Associates
WFA	Work Force Administration
WISE	Wholesale Internet Service Engine
WMC	Work Management Center
WMP	WISE Measurements of Performance
WorldCom	MCIMetro Access Transmission Services, LLC, and

	WorldCom Technologies, Inc.
xD Table	CLEC identification table
xDSL	"x" distinguishes various types of DSL
Zacks	A firm that provides earnings estimates

BACKGROUND

The federal Telecommunications Act of 1996 (Act) made sweeping changes to the regulation of telecommunications common carriers in this country. Of particular importance, it provided for the abolition nationwide of the incumbent local exchange carriers' monopolies over the provision of local exchange service. The Act envisioned three strategies for firms to enter the local exchange services market: (1) through resale of the incumbent's services; (2) via pure facilities-based offerings, thus only requiring a competitor to interconnect with the incumbent's network; and (3) through a hybrid involving the leasing of unbundled network elements (UNEs) of the incumbent's network facilities, typically in conjunction with network facilities owned by the entrant.

Although the Act generally spelled out the broad policy terms, the implementation details were left to the Federal Communications Commission (FCC). Specifically, the Act required that the FCC promulgate rules to implement the resale, interconnection, and UNE requirements within six months after passage of the Act. The rules subsequently established by the FCC provided detailed implementation requirements for pricing and provision of services. Of importance to this docket, the FCC's Local Competition Order, released August 8, 1996, included in its pricing rules Rule 51.507(f), which requires each state commission to establish rate zones for UNEs (the deaveraging rule). That rule states:

> State commissions shall establish different rates for elements in at least three defined geographic areas within the state to reflect geographic cost differences.

Since their establishment, these pricing rules have been the subject of a number of court decisions and FCC actions, which have directly impacted this issue and its resolution.

A. RECENT COURT DECISIONS

On May 13, 2002, the Supreme Court upheld the FCC's TELRIC pricing standard, stating that "[t]he FCC can require state commissions to set the rates charged by incumbents for leased elements on a forward-looking basis untied to the incumbent's investment." The Court rejected the incumbents' arguments that rates must be tied to past costs. The Court also held that the FCC can require incumbents to combine elements of their networks for competitors in certain circumstances. (Verizon Communications Inc., et al. v. Federal Communications Commission, et al., 152 L. Ed. 2d 701, 122 S. Ct. 1646, 2002 U.S. Lexis 3559 (May 13, 2002))

On May 24, 2002, the Court of Appeals for the D.C. Circuit remanded the Local Competition Order and the Line Sharing Order to the FCC for consideration in accordance with the Court's findings. United States Telecom Association v. FCC, 290 F.3d 415 (D.C. Circuit 2002) In doing so, the court found that the FCC's uniform national unbundling requirement failed to evaluate the competitive impairment in any particular market. Id. The court also found that the FCC's requirement to unbundle the high-frequency spectrum of the copper loop failed to consider the relevance of competition in broadband services from cable and satellite.

B. PETITION OF THE COMPETITIVE CARRIERS

Our procedure was initiated on December 10, 1998, when a group of carriers, collectively called the Competitive Carriers filed a Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. Among other matters, the Competitive Carriers' Petition asked that we set deaveraged unbundled network element (UNE) rates.

On May 26, 1999, we issued Order No. PSC-99-1078-PCO-TP, granting in part and denying in part the Competitive Carriers' petition. Specifically, we granted the request to open a generic UNE pricing docket for the three major incumbent local exchange providers, BellSouth Telecommunications, Inc. (BellSouth), Sprint-Florida, Incorporated (Sprint), and GTE Florida Incorporated (GTEFL). Accordingly, this docket was opened to address the deaveraged pricing of UNEs, as well as the pricing of UNE combinations and nonrecurring charges.

On November 2, 1999, the FCC released FCC Order 99-306 in CC Docket No. 96-45, which ordered the stay of the deaveraging rule to be lifted on May 1, 2000. The FCC had ordered the stay on May 7, 1999, after decisions by the U.S. Court of Appeals for the Eighth Circuit and the Supreme Court. The stay was ordered to allow the states to bring their rules into compliance. Order FCC 99-306 provided that "[b]y that date, states are required to establish different rates for interconnection and UNEs in at least three geographic areas pursuant to section 51.507(f) of the Commission's rules." FCC 99-306 at ¶ 120.

The original schedule established in Docket No. 990649-TP would not have resulted in permanent deaveraged UNE rates being in effect until after May 1, 2000. Accordingly, the parties were encouraged to develop and stipulate to interim deaveraged rates to avoid seeking a waiver of the deaveraging rule or conducting an accelerated proceeding. With our staff's assistance the parties agreed to interim deaveraged rates, and on December 7, 1999, the parties filed a Joint Stipulation Regarding Interim Deaveraging (Interim Rate Stipulation). In the Interim Rate Stipulation, the parties agreed that "this Stipulation is not intended to set a precedent for the resolution of any issue related to permanent deaveraged rates . . ." Order No. PSC-00-0380-S-TP at p.3.

Sprint currently has, and had at the time of the Interim Rate Stipulation, deaveraged recurring loop rates tariffed in Section E19 of its intrastate Access Service Tariff.[1] The Interim Rate Stipulation states that these tariffed rates will be Sprint's interim deaveraged rates. For BellSouth and Verizon (then GTEFL), interim rates were determined by staff using the procedures set forth in ¶5 of the Interim Rate Stipulation.

An administrative hearing was held on July 17, 2000, on the Part One issues identified in Order No. PSC-00-2015-PCO-TP, issued June 8, 2000. Part Two issues, also identified in Order No. PSC-00-2015-PCO-TP, were heard in an administrative hearing on September

[1]We note that Sprint's tariffs are presumptively valid, and as such, the tariffed rates were not scrutinized. Further, the impetus for the tariffed rates were the negotiated rates arising out of the Sprint/MCImetro arbitration, Docket No. 961230-TP, Order No. PSC-98-0829-FOF-TP. Those negotiated rates were stipulated to by the parties and filed as an amendment to their interconnection agreement. The negotiated recurring rates replaced interim rates for analog 2-wire loops, Bands 1 through 6; local switching, Bands 1 through 6; signal transfer points port and switching; SS7 links; line information database (LIDB) query transport and database query; dedicated transport DS-1 and DS-3; tandem transport, common; directory assistance (DA) database query service, toll and local assistance service; DA operator service; and 911 tandem port and lines service per DS-0 equivalent port.

19 and 22, 2000. On August 18, 2000, Order No. PSC-00-1486-PCO-TP was issued granting Sprint's Motion to Bifurcate Proceedings, for a Continuance and Leave to Withdraw Cost Studies and Certain Testimony, as well as Verizon Florida Inc.'s (formerly GTEFL) Motion to Bifurcate and Suspend Proceedings.

By Order No. PSC-01-1592-PCO-TP, issued August 2, 2001, the controlling dates for Phase III were established. By Order No. PSC-01-2132-PCO-TP, issued October 29, 2001, the issues were established and the Docket was divided into 990649A-TP, in which filings directed towards the BellSouth track would be placed, and 990649B-TP, in which filings directed towards the Sprint-Verizon track would be placed. An administrative hearing was held on April 29 and 30, 2002.

C. POST-HEARING

Post-hearing briefs were filed on May 28, 2002. AT&T Communications of the Southern States, LLC (AT&T), WorldCom, Inc., on behalf of its Florida operating subsidiaries MCI WorldCom Communications, Inc., MCImetro Access Transmission Services, LLC, and Intermedia Communications, Inc. (collectively WorldCom), and Florida Digital Network, Inc. (FDN) filed a joint brief. For purposes of the Sprint phase of this docket, AT&T, WorldCom and FDN are collectively known as the "ALEC Coalition". On May 29, 2002, KMC TeleCom III, LLC, filed a letter adopting the position of the ALEC Coalition. The Florida Cable Telecommunications Association (FCTA) did not file a post-hearing brief but expressed a desire to remain a party.

DISCUSSION OF DECISIONS

I: FACTORS IN ESTABLISHING RATES AND CHARGES

The Telecommunications Act of 1996 (the Act), Sections 252(d)(1)(A)(B), state that network element rates:

(A) shall be--

> (i) based on the cost (determined without reference to a rate-of-return or other rate-based proceeding) of

> providing the interconnection or network element (whichever is applicable), and
>
> (ii) nondiscriminatory, and
>
> (B) may include a reasonable profit.

The appropriate methodology as determined by the FCC is set forth in 47 C.F.R. § 51.505(b). Section 51.505(b) defines TELRIC as

> . . . the forward-looking cost over the long run of the total quantity of the facilities and functions that are directly attributable to, or reasonably identifiable as incremental to, such element, calculated taking as a given the incumbent LEC's provision of other elements.
>
> (1) . . . The total element long-run incremental cost of an element should be measured based on the use of the most efficient telecommunications technology currently available and the lowest cost network configuration, given the existing location of the incumbent LEC's wire centers.

Section 51.505(b) further provides that a forward-looking cost of capital and economic depreciation rates must be used. Section 51.505(a)(2) provides that the forward-looking cost of a UNE should include "[a] reasonable allocation of forward-looking common costs. . . ."

A. ARGUMENT

Sprint witness Hunsucker states that:

> [a] fundamental objective of the Telecom Act of 1996 is to open all telecommunications markets to competition. Congress recognized that there are substantial barriers to entry into the local exchange market. In particular, the local exchange network is highly capital intensive. Facility-based entrants are confronted by the formidable hurdle of having to devote substantial capital resources, over an extended period of time, to construct a local

> network prior to winning any customers or generating any revenues.

Sprint witness Hunsucker contends that the use of forward-looking economic costs to establish UNE rates is economically appropriate and is required by Section 252(d)(1) of the Act. He points out that in its August 8, 1996 First Report and Order, issued in Docket No. 96-98, the FCC adopted the Total Element Long-Run Incremental Cost (TELRIC) methodology. He explains that this nomenclature ". . . reflects that the methodology is applied to the costing of discrete network elements or facilities, rather than the cost of a service or services provided over that facility."

Witness Hunsucker recognizes that there are differences between existing retail rate structures and levels and the rate levels and structures for unbundled network elements. He argues that:

> Consistent with the mandate of the Telecom Act of 1996, unbundled network elements should be priced at forward-looking economic costs. To the extent that retail rate levels or rate structures are inconsistent with unbundled network element prices, those retail rates should be restructured to bring them into consistency with unbundled network prices. Alternatively stated, the answer lies in moving retail rates toward economic cost levels, and not in introducing distortions in the pricing of unbundled network elements to bring them into conformance with the uneconomic pricing of incumbent LEC retail services.

Witness Hunsucker argues that neither the Telecom Act nor the FCC rules place any limitation on UNE pricing relative to retail rates. He asserts that retail rates should be restructured to recover any costs of UNEs used in provisioning the service. He opines that "[i]n the interim, however, any attempt to bring this into conformance in this proceeding is misplaced. Such an effort is beyond the focus of this proceeding."

KMC witness Wood asserts that ". . . the ILEC perspective on how the CLECs operate and use UNEs is incorrect, and the ILEC pricing proposals, if adopted, will make the present bad situation significantly worse." He continues that:

> In general, the ILECs fail to recognize the impact on competition of their ubiquitous local networks, which have been established over many decades at ratepayer expense and in fulfillment of their monopoly obligations to serve everyone. It would be great if the CLECs could instantly replicate the ILEC networks. But this is not the situation today. Rather, we must rely upon investor capital in a very different marketplace without the opportunity for any guaranteed return, and ultimately we must provide our investors with a return on their investment while growing the business.

Witness Wood opines that the use of UNEs to fill in its network is a vital component. However, he argues that the ILEC UNE proposals " . . . have the potential to crush the CLEC industry." He urges that this Commission follow the actions of New York in setting a Sprint loop rate with an average of $11.49, and set UNE prices ". . . at a level that makes it economic for us to stay in these tier III markets . . . ." He notes that Sprint's proposed UNE rates are usually higher than its retail rates, in some cases substantially higher. He argues that this Commission must recognize that CLECs cannot compete when the UNEs for key components of services exceed the retail rates charged by Sprint. He urges that in evaluating Sprint's UNE proposal that this Commission choose assumptions in the model that will promote competition.

B. DECISION

The Telecom Act and the FCC rules set out the criteria to be used in setting UNE rates. We agree with witness Hunsucker that the relationship of UNE rates to retail rates is not one of the criteria to be used. Further, we note that the setting of retail rates is no longer under our jurisdiction. Rate-setting decisions must be based on forward-looking costs in accord with the Act's requirements.

Therefore, UNE rates shall be set using the forward-looking cost standards authorized by Section 252(d)(1) of the 1996

Telecommunications Act, the FCC's rules and orders implementing that section of the Act, and the court decisions that affect those rules and orders.

II. METHODOLOGY AND RATE STRUCTURE FOR DEAVERAGED UNES

A. ARGUMENTS

In his direct testimony, Sprint witness Hunsucker testifies that UNE rates should be deaveraged to the extent necessary ". . . to achieve a result wherein the averaged rate does not deviate significantly from the actual forward-looking cost of providing that element anywhere within the defined zone." Although he acknowledges that quantifying what is "significant" is not a precise exercise, the Sprint witness proposes that a difference between rates and costs in excess of 20% would be sufficient to distort ALECs' investment decisions. Given this standard, witness Hunsucker believes that an ILEC's deaveraged rate schedule should be such that ". . . the average rate in each zone is no more than 20% higher or 20% lower than the forward-looking cost of providing that element." The Sprint witness further notes that it follows from this standard that the extent to which deaveraging occurs likely will vary across UNEs and can differ among ILECs. Moreover, the appropriate number of rate zones may vary according to the element in question.

Witness Hunsucker offers criteria that Sprint believes should guide implementation of deaveraging. First, the extent to which rate deaveraging occurs should be tempered by administrative concerns as well as an evaluation of the degree to which a failure to deaverage would have a material impact on competitive and investment decisions. Second, he testifies that forward-looking costs should be deaveraged at the wire center level. Third, he testified that:

> incumbent LECs should be required to group wire centers into zones, and develop rates based on the weighted average cost of the UNE for all wire centers within each zone, subject to the constraint that the average rate for a UNE zone should not deviate by more than 20% from the wire center forward-looking cost of that UNE for any wire center included in that zone.

However, witness Hunsucker allows that it may be appropriate to relax the 20% criterion in the lowest and highest cost zones to provide for greater price/cost deviation; to do so, he states, acknowledges that the lowest and highest cost zones would tend to exhibit the greater cost variances, as well as a desire not to establish an excessive number of rate zones.

Sprint witness Hunsucker notes that his company scrutinized this Commission's orders in the BellSouth phase of this proceeding and generally has attempted to reflect this Commission's prior decisions in its filings. He testifies that since Sprint functions both as an ILEC and an ALEC in Florida, Sprint believes that this Commission's decisions should be applied on a state-wide, industry-wide basis. Witness Hunsucker asserts that Sprint should be treated the same as other ILECs in terms of cost methodologies and pricing principles, and Sprint the CLEC should be able to obtain UNEs in Florida whose prices were developed on a comparable basis to that used by Sprint (the ILEC) to derive prices for UNEs it is required to offer.

Strict application of Sprint's 20% criterion yields nine distinct rate zones for unbundled UNE loops. "However, consistent with what the Commission mandated in the Phase II proceeding (BellSouth), Sprint aggregated wire centers in the high cost and low cost bands such that the distribution of lines in each band was consistent with the distribution required for BellSouth." According to Sprint witness Hunsucker's Exhibit MRH-2, collapsing the initial zones in this manner yields three zones, with a distribution of lines of approximately 60%, 30%, and 10%, respectively, in the three zones.

On April 10, 2002, Sprint witness Hunsucker submitted supplemental direct testimony, in which he presented a revised rate banding proposal and revised Exhibits MRH-1 (Sprint's proposed price list) and MRH-2 (collapsed rate banding proposal). He noted that it was Sprint's intent in its original filing for its banding proposal to ". . . be consistent with the banding requirements placed on BellSouth in its phase of this proceeding to ensure implementation of a nondiscriminatory methodology on all carriers in the state of Florida." The Sprint witness testifies that Sprint based its initial distribution of lines to zones on a September 24, 2001 BellSouth compliance filing. However, witness Hunsucker states that Sprint subsequently discovered that the BellSouth compliance filing on which it had relied was incorrect. Noting that BellSouth submitted a corrected compliance filing on October 8, 2001, Sprint witness Hunsucker indicates that its rate banding proposal needs to be revised in order to be in accord with the relationships actually ordered for BellSouth.

Witness Hunsucker states that it is Sprint's understanding that while this Commission adopted Sprint's recommended 20% criterion, it chose to collapse the result of applying this approach in the BellSouth phase to three zones, based on two considerations: administrative ease and the level of variation in BellSouth's costs. He observes that in BellSouth's October 8, 2001 compliance filing, the SL1 wire center level costs ranged from $8.21 to $226.21, a multiple of 27. The Sprint witness notes that the wire center level costs for a 2-wire loop shown on his Exhibit MRH-3 range from $11.78 to $306.78, or a multiple of 26. Accordingly, he concludes that the level of cost variation is similar for Sprint and BellSouth.

Based on administrative ease and cost variation, witness Hunsucker proposes three UNE rate zones for Sprint. Starting with the nine zones on his Exhibit MRH-3, he proposes to collapse Zones 1 and 2 to yield new Zone 1; collapse Zones 3 and 4 to yield new Zone 2; and collapse Zones 5 through 9 to yield new Zone 3. Zone 1 consists of 20% of Sprint's wire centers and 38% of lines; Zone 2 contains 41% of the wire centers and 51% of the lines; and Zone 3 has 39% of the wire centers and approximately 11% of the access lines.

There is very little ALEC testimony on this issue. KMC witness Wood observes that Sprint is proposing to collapse its existing six UNE loop rate bands into three. He mentions three central offices in which KMC has collocation facilities in Tallahassee: Tallahassee Calhoun, which is currently in Band 1; Tallahassee Willis Road, currently in Band 2; and Tallahassee Blairstone Road, in current Band 3. Witness Wood contends that Sprint's present 2-wire UNE loop rates for the first three bands are: Band 1, $10.78; Band 2, $15.41; and Band 3, $20.54. However, he notes that under Sprint's proposed rate bands, all three of these central offices would be in Band 1, at a rate of $21.22, a significant overall increase to KMC.

Witness Wood recommends that this Commission ". . . should carefully consider the proposed geographic deaveraging for loop prices, and if necessary, adopt more rather than fewer bands. This seems especially true for Sprint where the present 6 band approach results in rates that are at least tolerable [sic] Band 1 and Band 2 offices."

Although FDN submitted no testimony on this issue, in its brief FDN argues that Sprint deviates from its own deaveraging proposals and methodology, in order to be consistent with this Commission's findings in the BellSouth phase. FDN states that Sprint's analysis yields nine zones, but they propose only three zones; that Sprint proposes to deaverage only loops and related combinations, although Sprint acknowledges other elements that demonstrate geographic cost variability; and that Sprint does not apply its banding approach by UNE, but instead bases UNE zones for other elements on the assignments for the 2-wire loop. FDN alleges that collapsing cost data for the low cost zones yields rates that deviate significantly from the underlying costs. FDN asserts that under Sprint's proposed zones an ALEC would pay $18.58 for a 2-wire loop in Zone 1, even though two wire centers assigned to this zone have costs per line less than $12.00. Rate structure distortions also are alleged to occur in Sprint's deaveraging of DS-1 loops, due to assigning wire centers to rate zones based on 2-wire loop relationships. FDN concludes that "[t]he Commission should either strictly follow the 20% methodology and allow nine zones for 2-wire loops, and determine the appropriate number of zones and zone costs for each deaveraged element, or it should factor in competitive considerations as well." Competitive considerations noted include whether too few wire centers are assigned to Zone 1, or that the rate in Zone 1 ". . . is too high to promote competition."

In response to KMC witness Wood's desire for more than three rate bands, Sprint witness Hunsucker testifies that in principle Sprint is not adverse to greater deaveraging. However, he notes that while Sprint offered a deaveraging proposal in the BellSouth phase that yielded more than three rate bands, this Commission essentially collapsed that proposal into three zones. Witness Hunsucker concludes that Sprint would be at a competitive disadvantage if it were required to deaverage more than was ordered for BellSouth.

B. DECISION

As noted above, application of Sprint's +/- 20% rate banding criterion yields nine distinct rate zones; however, to be roughly consistent with the rate bands approved for BellSouth, Sprint proposes to collapse these nine bands into three zones, to approximate BellSouth's distribution of lines for its three rate zones. For ease of reference, Table 2a-1 contains data on Sprint's non-collapsed nine zones for the 2-wire loop, and Sprint's three zone proposal. This table shows the number of wire centers and lines associated with each band, and the band's rate (based on our staff's cost results) that would result. Again, Sprint collapsed Bands 1 and 2 to arrive at its proposed Band 1; Bands 3 and 4 to yield its Band 2; and the remaining five bands equal proposed Band 3.

TABLE 2(a)-1: Deaveraging Analysis - Non-Collapsed

Band	Wire Centers	Total Lines	Percent Lines	Rate
1	4	111,921	5.11%	$ 10.82
2	28	817,425	37.29%	$ 17.63
3	29	749,058	34.17%	$ 24.68
4	20	265,211	12.10%	$ 33.61
5	28	202,255	9.23%	$ 49.81
6	8	23,091	1.05%	$ 72.70
7	7	12,795	0.58%	$ 95.15
8	8	9,366	0.43%	$ 131.07
9	1	744	0.03%	$ 263.09
	133	2,191,866	100.00%	$ 26.20

Sprint Proposed

Band	Wire Centers	Total Lines	Percent Lines	Rate
1	27	828,559	37.80%	$ 18.58
2	54	1,115,056	50.87%	$ 30.26
3	52	248,251	11.33%	$ 66.91
	133	2,191,866	100.00%	$30.00

Source: EXH 1, Exhibits MRH-3 and Revised MRH-2.

KMC witness Wood's primary concern appears to be that the Commission-ordered deaveraging will result in a rate structure (and rates) that differs from that in Sprint's current tariff, and that it results in rate increases to KMC. Although we are sympathetic to the KMC witness's concern, we believe that our decision on this issue must be guided by the FCC's deaveraging rule, Rule 51.507(f), which provides that "State commissions shall establish different rates for elements in at least three different geographic areas within the state **to reflect geographic cost differences**." (Emphasis added). Moreover, we agree with witness Wood that we should consider whether it is appropriate to adopt more than three bands; however, as we concluded in the BellSouth phase, we find that such a decision should also consider administrative ease and a rate structure that reflects the level of variation in Sprint's costs. Similarly, in its brief FDN argues that Sprint should either adopt the nine zones that result from its methodology, or consider "competitive considerations" such as the number of wire centers assigned to a zone or whether the rate in the initial zone "is too high to promote competition." We believe FDN's first competitive consideration would be addressed when evaluating administrative ease and level of cost variation; however, FDN's second factor likely is too subjective to successfully implement.

Based on our review of the non-collapsed data shown in Table 2a-1, we believe that in principle there are several viable alternative deaveraging options, in addition to Sprint's proposal. Using our staff's adjusted cost figures, we have generated four additional alternatives; these are shown in Table 2a-2.

TABLE 2(a)-2: Alternative Deaveraging Proposals				
Alternative 1				
Band	Wire Centers	Total Lines	Percent Lines	Rate
1	32	929,346	42.40%	$ 16.81
2	29	749,058	34.17%	$ 24.68
3	20	265,211	12.10%	$ 33.61
4	52	248,251	11.33%	$ 57.98
	133	2,191,866	100.00%	$ 26.20
Alternative 2				
Band	Wire Centers	Total Lines	Percent Lines	Rate
1	32	929,346	42.40%	$ 16.81
2	29	749,058	34.17%	$ 24.68
3	72	513,462	23.43%	$ 45.40
	133	2,191,866	100.00%	$26.20
Alternative 3				
Band	Wire Centers	Total Lines	Percent Lines	Rate
1	4	111,921	5.11%	$ 10.82
2	28	817,425	37.29%	$ 17.63
3	29	749,058	34.17%	$ 24.68
4	20	265,211	12.10%	$ 33.61
5	52	248,251	11.33%	$ 57.98
	133	2,191,866	100.00%	$ 26.20
Alternative 4				
Band	Wire Centers	Total Lines	Percent Lines	Rate
1	4	111,921	5.11%	$ 10.82
2	28	817,425	37.29%	$ 17.63
3	29	749,058	34.17%	$ 24.68
4	72	513,462	23.43%	$ 45.40
	133	2,191,866	100.00%	$ 26.20

As noted above, Sprint's Band 1 equals uncollapsed Bands 1 and 2; proposed Band 2 equals uncollapsed Bands 3 and 4; and Sprint's Band 3 equals Bands 5 through 9. Alternative 1 differs from Sprint's proposal by not combining uncollapsed Bands 3 and 4, but leaving them as separate zones; these two bands contain approximately 34% and 12%, respectively, of Sprint's access lines, and there is a fairly significant cost break between these two zones. Alternative 2 is derivative from Alternative 1, except that Alternative 1's Bands 3 and 4 (or equivalently, uncollapsed bands 4 through 9) are collapsed into a single zone. This results in a three zone option that yields, relative to Sprint's proposal, lower rates in Bands 2 and 3. Alternative 3 takes Alternative 1 but does not combine uncollapsed Bands 1 and 2 into a single zone. Relative to Alternative 1, Alternative 3 has a lower Band 1 rate and a slightly higher Band 2 rate; however, the new Band 1 only contains 4 wire centers and accounts for about 5% of Sprint's lines. Finally, Alternative 4 is Alternative 2 without combining uncollapsed Bands 1 and 2.

We find that there are advantages and disadvantages to Sprint's proposal and to each of the four alternatives discussed above. Sprint's proposal presumably was driven by a desire to have zones that approximated those established for BellSouth. However, we note that we chose to arrive at three zones for BellSouth by collapsing six bands that had been arrived at by applying Sprint's banding methodology. In contrast, application of the Sprint banding methodology to Sprint's cost data yields nine bands. While the ratios of BellSouth's and Sprint's lowest and highest loop costs may be similar, we find that the difference in the number of zones (before collapsing) strongly suggests meaningful differences in the geographic distribution of costs between these two companies. As such, we believe that excessive collapsing of bands may unduly mask cost differences.

An advantage of Alternative 1 is that it acknowledges the existence of a key difference and distribution in costs by "unpacking" Sprint's proposed Band 2 into two discrete bands. A disadvantage is that this option does not lead to the lowest rate for Band 1, a deficiency that Alternatives 3 and 4 remedy. However, to arrive at a low Band 1 rate results in a zone consisting of only 4 out of Sprint's 133 wire centers and a little over 100,000 lines as in Alternative 3. Alternative 2 has the lowest rate in the last zone, but not in the initial zone;

Alternative 4 solves this aspect but has the same flaw as does Alternative 3.

On balance, we find that Alternative 4 is the most appropriate and, therefore, we adopt Alternative 4's four zones. Of the four options presented by our staff, we find that Alternative 4 has the greatest likelihood of encouraging competition. It yields the lowest rate in zone 1 and its four-zone structure reasonably reflects the company's distribution of costs.

Finally, we note that FDN complains in its brief that Sprint has based its assignment of all types of loops to rate zones, based on its deaveraging analysis for 2-wire loops, rather than performing distinct analyses for each loop type and loop combination. We observe that there is no testimony in this proceeding as to whether or not separate deaveraging analyses should be conducted, for each UNE that is to be deaveraged. Sprint's approach is consistent with that applied in the BellSouth phase of this proceeding; absent any testimony on this matter to support an alternative conclusion, we find that application of the 2-wire deaveraging results to other UNEs to be deaveraged is appropriate.

We find that Alternative 4, the four zone deaveraging proposal discussed in our analysis, modified as necessary to acknowledge use of our ordered loop costs, is adopted. We find that it is appropriate to use the assignment of wire centers to rate zones as shown in Appendix B. However, we direct our staff to consider in future proceedings whether the 20% initial banding is the most appropriate banding methodology for Sprint, or whether another methodology would be more appropriate.

II (b): UNES SUBJECT TO DEAVERAGED RATES

A. ARGUMENT

Sprint witness Hunsucker testifies that the TELRIC of ". . . unbundled loops, subloops, local ports and local switching usage, common and dedicated transport, and dark fiber all vary significantly by geographic area." However, he notes that Sprint, consistent with what this Commission ordered in the BellSouth phase of this proceeding, proposes to deaverage the recurring rates for loops below DS3, subloops, and combinations containing such loops.

Although not sponsoring any testimony on this issue, in its brief FDN states that in addition to loop, subloops and combinations containing loops and subloops, this Commission should also consider deaveraging interoffice transport. Moreover, FDN contends that since BellSouth was required to deaverage all loops below DS3, ". . . so Sprint should be required to deaverage dark fiber loops." However, FDN admits that it would be acceptable for this Commission to require only loops, subloops, and combinations thereof to be deaveraged.

B. DECISION

In Order No. PSC-01-1181-FOF-TP, issued on May 25, 2001, in Docket No. 990649-TP, we ordered BellSouth to deaverage loops below DS3, subloops, and combinations of loops and subloops. Order No. PSC-01-1181-FOF-TP at p. 42. Sprint proposes to deaverage the same elements as previously ordered for BellSouth. While FDN agrees that Sprint should deaverage this same set of elements, it also contends that dark fiber should also be deaveraged. We note that BellSouth was not required to deaverage dark fiber, and no reason has been offered as to why Sprint should be singled out to deaverage dark fiber. As such, Sprint shall not be ordered to deaverage dark fiber. Further, we find it appropriate that the recurring costs of all varieties of loops and subloops below DS3, and combinations containing such loops, shall be deaveraged.

III (a) and (b): XDSL CAPABLE LOOPS AND COST STUDY DISTINCTIONS

A. ARGUMENT

Sprint witness Dickerson asserts that:

> As a general and practical matter, xDSL capable loops are copper loops that are 18,000 feet in length or shorter. To be xDSL capable, a loop must not contain any devices that impede the xDSL frequency signaling such as repeaters, load coils or excess bridged tap. Copper loops which contain any of these three will require loop conditioning to remove the repeaters, load coils or excess bridged tap.

Additionally, witness Dickerson notes that some fiber-fed Next Generation Digital Loop Carrier (NGDLC) vendors have recently developed plug-in cards, which can be used at the NGDLC location to provide xDSL service to customers served by the NGDLC. Witness Dickerson states that Sprint-Florida might have deployed such plug-in cards in a test environment only. Witness Dickerson asserts that neither the FCC nor this Commission has designated these plug-in cards as subject to UNE unbundling. Therefore, the current practical result is that unbundled xDSL-capable loops are copper or copper distribution loop sub-elements.

In the event competitive local exchange carriers (CLEC) request xDSL capable loops in excess of 18,000 feet in length, witness Dickerson asserts that Sprint will provide any available copper loop in excess of 18,000 feet. Furthermore, Sprint will perform any loop conditioning requested by the ALEC at an additional charge. Notwithstanding this, since loops in excess of 18,000 feet are beyond the generally accepted industry standard limit for xDSL, witness Dickerson asserts that Sprint will accept no responsibility for the xDSL capabilities of conditioned copper loops longer than 18,000 feet.

Regarding the issue of whether a cost study for xDSL-capable loops should make distinctions based on loop length or the particular DSL technology to be deployed, witness Dickerson testifies that copper loops 18,000 feet and shorter containing no repeaters, load coils or excess bridged tap require no further cost study distinctions. The witness states that logical distinctions are made in non-recurring rates for loop conditioning depending on the length of the loop. However, witness Dickerson opines that Sprint's recurring charges require no distinction in the underlying loop cost other than for standard issues of loop length, terrain, customer density, plant mix, etc., that are already reflected in Sprint's unbundled loop cost studies.

Witness Dickerson explains that the costs for 2-wire and 4-wire xDSL-capable loops are the same as the costs of 2-wire voice grade loops and 4-wire analog loops. The witness notes that the forward-looking network design used within Sprint's loop cost model (SLCM) to develop the 2-wire voice grade loop is also capable of supporting xDSL service for those loops served on copper. This is because the forward-looking network design is free from any load coils, repeaters, or excess bridged taps that would otherwise inhibit xDSL technology on the copper loops. However, Sprint witness Davis notes that the FCC has allowed ILECs to charge for the conditioning of copper loops in the embedded network to enable their use for xDSL technology.

Sprint states that no attempt was made to model a mixed fiber/copper xDSL-capable facility. This decision was made because the technology to provide an xDSL-capable loop through a Digital Line Carrier is only in a test environment. In the event a CLEC requests that xDSL be provisioned over a loop with fiber-fed NGDLC, Sprint notes that the CLEC can collocate its Digital Subscriber Line Access Multiplexer (DSLAM) at the remote terminal and purchase subloop elements.

Witness Davis asserts that xDSL services are compromised with the presence of load coils, repeaters, and bridged tap. Load coils will block the transmission of DSL-based services for both copper-fed and NGDLC-provisioned xDSL-capable loops. For this reason, witness Davis notes that forward-looking networks are designed with loops short enough to avoid the need for load coils.

Witness Davis explains that repeaters are found in outside plant and are generally used to amplify a signal over a copper loop. While repeaters are installed to support digital services such as T1 and ISDN, witness Davis notes that they will interfere with xDSL signals.

Regarding the impact of bridged tap on xDSL services, witness Davis explains that bridged tap degrades the quality of any type of signal and is magnified when xDSL is placed on a loop. Specifically, witness Davis states that:

> . . . [f]or voice transmission on a non-loaded Revised Resistance Design (RDD) cable pair, Bridged Tap cannot exceed 6,000 feet. Sprint utilizes industry standard Carrier Serving Area (CSA) guidelines which limits total bridged tap to 2,500 feet, with no single bridged tap exceeding 2,000 feet for DSL capable loops.

FDN asserts in its post-hearing brief that xDSL-capable loops are loops that are capable of providing xDSL services over both copper, fiber and mixed copper/fiber facilities without any modification. Furthermore, FDN agrees with Sprint that a cost study need not make any distinction based on loop length or the particular DSL technology to be deployed. KMC agrees with FDN's position. Neither of these parties filed testimony regarding xDSL-capable loops.

B. DECISION

In summary, an xDSL-capable loop, for the purposes of this proceeding, is a basic copper 2-wire or 4-wire UNE loop possessing the characteristics that allow for transmission of xDSL-based technology signals. While FDN opines that xDSL-capable loops include the provisioning of xDSL over mixed copper and fiber facilities without any modification, this technology is only in the testing stage. Furthermore, while it may not be unreasonable for loop prices to vary by loop length, we find that it is not necessary that a cost study for copper-based xDSL-capable loops make distinctions based on loop length or the particular DSL technology an ALEC intends to put on the loop.

IV (a): UNBUNDLING AND SETTING PRICES FOR SUBLOOPS

The FCC defines subloops ". . .as portions of the loop that can be accessed at terminals in the incumbent's outside plant." FCC 99-238[2] at ¶206. The FCC also believes ". . .that a broad definition of the subloop that allows requesting carriers maximum flexibility to interconnect their own facilities at these points where technically feasible will best promote the goals of the Act." FCC 99-238 at ¶ 207. The FCC concludes that ". . .access to the subloop, will facilitate rapid development of competition, encourage facilities-based competition, and promote the deployment of advanced services." FCC 99-238 at ¶ 207.

A. ARGUMENT

In his direct testimony, Sprint witness Hunsucker explained how the FCC defines the subloop UNE:

> "'. . . as any portion of the loop that is technically feasible to access at terminals in the incumbent LEC's outside plant, including inside wire. An accessible terminal is any point on the loop where technicians can access the wire or fiber within the cable without removing a splice case to reach the wire or fiber within. Such points may include, but are not limited to, the pole

[2]Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Docket No. 96-98, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, FCC Order 99-238, (released November 5, 1999).

> or pedestal, the network interface device, the minimum point of entry, the single point of interconnection, the main distribution frame, the remote terminal, and the feeder/distribution interface.'"[3]

Sprint Witness Hunsucker discusses that due to the fact that subloop elements have been recently defined, Sprint does not know what the demand for various subloops will be. He states that the lack of this knowledge makes it extremely difficult to price subloops. Sprint has developed costs and proposed rates for feeder and distribution subloops since that it is where it believes the demand for subloops will be. Witness Hunsucker asserts that if an ALEC requests a subloop element for which a rate has not been developed, Sprint will price the element on an individual case basis, using the TELRIC methodology. Sprint is not proposing rates for intra-building house and riser subloops.

In deposition, Sprint witness Hunsucker was asked what subloops Sprint would be willing to offer other than two- and four-wire feeder and distribution subloops. He responded that "Sprint would be prepared to offer any subloop that would be technically feasible, and it would be subject only to technical feasibility." As far as costing of these additional elements, witness Hunsucker responded that "[w]e [Sprint] would do it on an individual case basis by looking at exactly what the CLEC was requesting and determining what the appropriate cost components are in developing a TELRIC price for that consistent with the way we did for feeder and distribution."

With individual case basis pricing, witness Hunsucker stated that the prices will be filed with this Commission to the extent that they are required to be included in interconnection agreements. He observes that ALECs will also be able to negotiate these rates and any dispute over these rates could come before this Commission in an arbitration proceeding.

According to Sprint's cost model documentation, the assumptions used in the local loop study are also applicable to the subloop study. These costs were developed from the sum of the investment for feeder, distribution, and serving area interfaces

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[3]Witness citing to 47 CFR §51.319(a)(2).

(SAI) for a 2-wire voice grade loop. Since it is the interface between feeder and distribution plant, the SAI is included in both the feeder and distribution subloop elements. Included in the cost of subloop feeder are the DLC systems and SAI, while the costs for distribution subloops include the costs for the SAI and the distribution facilities. The annual charge factor used in the model is applied to the subloop feeder to determine the cost for these elements.

In its brief, FDN asserts (and KMC concurs) that the rates for subloops should be geographically deaveraged and that Sprint should be required to provide the same subloop elements that BellSouth was required to offer in Docket No. 990649-TP. There is no testimony in the record to support this position. In Order No. PSC-01-1181-FOF-TP, this Commission required BellSouth to provide subloop feeder (USL-F), subloop distribution (USL-D), network interface device (NID), intra-building network cable (INC), network terminating wire (NTW), and unbundled subloop concentration (USLC). Order No. PSC-01-1181-FOF-TP at pp. 77-78.

While FDN does take the position that rates for subloop elements should be deaveraged, we note that Sprint's proposed subloop rates are geographically deaveraged into three proposed rates bands.

In an inquiry about Sprint's ability to provide network interface devices, intra-building network cable, network terminating wire, and unbundled subloop concentration as required for BellSouth, witness Hunsucker did not respond directly to the question, but did state that he believes that due to lack of information as to what the ALEC is requesting, Sprint would have difficulty proposing rates for these subloops required of BellSouth.

In an interrogatory response, Sprint states that it is not possible to use similar ordering, provisioning, and recurring costs of other wholesale offerings as surrogates to determine the prices of other subloop elements. Sprint also stated that such an approach would not result in an accurate or meaningful estimate of forward-looking cost. Sprint continues by saying that "[t]here are no meaningful comparative matches of wholesale offerings for drops, drop terminals, serving area interfaces, NGDLCs, etc., to serve as surrogates for UNE sub-loop[4] pricing."

When requested to estimate how much experience with subloops and subloop interconnections Sprint would need to have before developing generic rates for subloops, witness Hunsucker responded that it was a difficult question to answer due to a lack of experience providing specific configurations of subloop elements. He points out that Sprint would have an incentive to develop generic rates for specific configurations based on the number of requests it receives, but will continue to provide subloops on an individual case basis (ICB) until there are enough requests to develop generic prices.

B. DECISION

As indicated in the record, Sprint has yet to receive any requests for subloop elements in Florida. Sprint has proposed deaveraged rates for subloops in rate zones, for the subloop elements it believes will most likely be requested. For any other subloops, Sprint proposes pricing them on an individual case basis until there has been enough demand for the company to price these elements generically. We find that any disputes over individual case basis subloop rates can be settled by us in an arbitration proceeding. Once there has been sufficient demand on an individual case basis for a particular subloop, Sprint shall be required to determine the TELRIC-based rate for that particular subloop, and file the rate and cost support with us for review. Due to the fact that subloop elements have been recently defined and Sprint lacks experience in providing access to subloop elements, TELRIC-compliant ICB pricing is reasonable for subloop elements other than Sprint's proposed feeder and distribution subloops.

In conclusion, we find that Sprint shall unbundle the feeder and distribution subloop elements. Sprint shall also provide any other technically-feasible subloop elements requested by ALECs on an individual case basis.

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[4]In this recommendation subloop and sub-loop are used interchangeably.

IV (b): ACCESS AND PRICING OF ACCESS TO SUBLOOPS

Concerning access to subloops, the FCC, in FCC Order 99-238[5] states that:

> We conclude that incumbent LECs [Local Exchange Companies] must provide unbundled access to subloops. Applying our unbundling analysis, we conclude that lack of access to unbundled subloops at technically feasible points throughout the incumbent's loop plant will impair a competitor's ability to provide services that it seeks to offer. We agree with commenters that self-provisioning subloop elements, like the loop itself, would materially raise entry costs, delay broad-based entry, and limit the scope and quality of the competitive LECs service offerings. In addition, we find that access to the subloop elements promotes self-provisioning of part of the loop, and thus will encourage competitors, over time, to deploy their own loop facilities and eventually to develop competitive loops where it is cost efficient to do so.

FCC Order 99-238 at ¶ 209.

The FCC defines an "accessible terminal" as:

> . . .a point on the loop where technicians can access the wire or fiber within the cable without removing a splice case to reach the wire or fiber within. These would include a technically feasible point near the customer premises, such as the pole or pedestal, the NID or the minimum point of entry to the customer premises (MOE). Another point of access would be the feeder distribution interface (FDI), which is where the trunk line, or "feeder" leading back to the central office, and the "distribution" plant, branching out to the subscribers, meet, and "interface." A third point of access is, of course, the main distribution frame in the incumbent's central office.

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[5]Third Report and Order and Fourth Further Notice of Proposed Rulemaking, cc Docket No. 96-98, <u>In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996</u>, FCC Order 99-238, (released November 5, 1999).

> We believe that a broad definition of the subloop that allows requesting carriers maximum flexibility to interconnect their own facilities at these points where technically feasible will best promote the goals of the Act.

FCC Order 99-238 at ¶ 206, ¶ 207.

In regards to the presumption of the accessability of subloop elements, the FCC Order states:

> . . . [W]e establish a rebuttable presumption that the subloop can be unbundled at any accessible terminal in the outside loop plant. If the parties are unable to reach an agreement pursuant to voluntary negotiations about the availability of space or the technical feasibility of unbundling the subloop at one of the points identified above, the incumbent will have the burden of demonstrating to the state, in the context of a section 252 arbitration proceeding, that there is no space available or that it is not technically feasible to unbundle the subloop at these points.

FCC Order 99-238 at ¶ 223.

A. ARGUMENT

In his direct testimony, Sprint witness Dickerson discusses the fact that industry standards for subloop unbundling are still being developed. He states that Sprint's lack of experience with subloop unbundling makes it difficult for Sprint to establish forward looking costs in interconnection agreements. He goes on to say that these costs should be on an individual case basis until industry standards are developed.

Through discovery our staff asked Sprint why it is impossible to predict the forward-looking costs of establishing ALEC interconnection to the subloop elements with any certainty. Sprint responded that various network, technical, and site specific issues would affect the cost of providing access to various subloop elements. Sprint witness Hunsucker believes that once the industry develops standards and practices, and Sprint gains experience providing subloop interconnection, it would become feasible for Sprint to develop rates for subloop interconnection.

In responses to various interrogatories concerning this issue, Sprint responded that "Sprint-LTD has not received any orders from CLECs for access to sub-loop elements and has, therefore, not provided CLECs access to sub-loop elements." Further, in response to an interrogatory regarding technical feasibility for the provisioning of sub-loops at various points, Sprint replied that it is technically feasible to access subloop elements at the following points:

- Pole or Pedestal
- Network Interface Device
- Minimum Point of Entry
- Single Point of Interconnection
- Main Distribution Frame
- Remote Terminal
- Feeder/Distribution Interface

FDN appears to be silent concerning how access to subloop elements should be provided.

B. DECISION

The FCC makes it clear that access to subloops must be provided anywhere it is technically feasible. The FCC puts the burden of proof on the incumbent carrier to demonstrate that access to a subloop at a specific point is not technically feasible, and any disputes are to be handled by the states in a section 252 arbitration proceeding. Sprint points out that due to the newness of the subloop elements and its lack of experience in provisioning these elements, it would like to provide access to subloops on an individual case basis. We find this acceptable with the understanding that we will resolve any disputes over rates and technical feasibility.

We find that Sprint shall be required to provide access to subloop elements at any technically feasible point. Due to the fact that Sprint does not have any experience in providing access to subloops, and does not propose any rates for access to subloop elements, prices for access to subloop elements shall be on an individual case basis. We also find that these prices shall be TELRIC-based and shall be filed with us in the appropriate interconnection agreements or amendments to such agreements.

V: RATES FOR SIGNALING NETWORKS AND CALL-RELATED DATABASES

A. ARGUMENT

Sprint proposed that UNE rates be set for the following database items:

- 911/E911
- STP Ports and STP Switching (SS7 Interconnection)
- Database Query Services.

Sprint witness Fuller states that "[i]n the State of Florida, Sprint's arrangement with the local Public Safety Answering Point (PSAP) recovers all recurring costs of [911/E911] this service outside of any transport required by the ALEC to connect its switch with Sprint's 911 tandem."

Witness Fuller also describes Signaling System Seven (SS7) interconnection. He explains that "SS7 interconnection consists of Signal Transfer Point (STP) ports, interconnecting facilities, and STP switch usage." He notes that the service provides a signaling path for SS7 between a customer designated point of signaling premises and a Sprint STP that is used to transmit and receive information related to call completion.

Witness Fuller lists the following database query services that Sprint proposes to provide:

- Local Number Portability (LNP)
- Line Information Database (LIDB)
- Calling Name (CNAM)
- Toll Free Code (TFC) 800/888/877

FDN and KMC both stated in their briefs that they stipulated to Sprint's position. Neither company addressed the issue further and no party besides Sprint provided any testimony on this issue.

B. DECISION

We note that this section addresses only which services shall be provided, not the specific rates. The parties agree with Sprint's position on this issue. Therefore, rates shall be set for the call-related database items proposed by Sprint.

VI: RECOVERING NON-RECURRING COSTS THROUGH RECURRING RATES

We note that there appears to be agreement among the parties on this issue, as all parties have agreed to Sprint's position. Since neither of the opposing parties submitted testimony on this issue, we have made our decision based on the limited testimony Sprint provided in the record and the position Sprint filed in its post-hearing brief.

A. ARGUMENT

Sprint witness Hunsucker believes that to the extent that high non-recurring charges are a significant barrier to competitive entry, it may be appropriate to require at least a portion of those non-recurring costs to be recovered through recurring rates. However, witness Hunsucker believes this practice should be the exception rather than the rule, and states as follows:

> Absent such compelling circumstances, Sprint belies that non-recurring costs should be recovered through non-recurring rates. Requiring non-recurring cost to be recovered through recurring charges raises a number of difficult policy and administrative issues. On the one hand, the incumbent LEC would be financially exposed if the CLEC discontinues service before the non-recurring cost are fully recovered. On the other hand, the incumbent LEC could over-recover its non-recurring cost unless it tracked each service installation and reduced its recurring rate at the point where the non-recurring costs built into that recurring rate were fully recovered.

B. DECISION

By definition non-recurring costs are the efficient, one-time costs associated with establishing, disconnecting or rearranging unbundled network elements purchased from an ILEC at the request of a customer (e.g., ALEC). The FCC rules allow state commissions to require recovery of non-recurring costs over time in recurring rates:

> State commissions may, where reasonable, require incumbent LECs to recover nonrecurring costs through recurring charges over a reasonable period of time.

> Nonrecurring charges shall be allocated efficiently among requesting telecommunications carriers, and shall not permit an incumbent LEC to recover more than the total forward-looking economic cost of providing the applicable element.

47 CFR §51.507(e). Similarly, the FCC's Local Competition Order[6] allows states to require an incumbent LEC to recover one-time costs as a recurring charge over a reasonable period of time in lieu of a nonrecurring charge. This arrangement would decrease the size of the entrant's initial capital outlay, thereby reducing financial barriers to entry. At the same time, any such reasonable arrangement would ensure that incumbent LECs are fully compensated for their nonrecurring costs. FCC Order 96-325 at ¶749.

The FCC's Local Competition Order observes that extremely high up-front costs may be a barrier that may be mitigated through payments over time. Acknowledging this possibility, the FCC allows a state commission ". . . to permit incumbent LECs to charge initial entrants a proportionate fraction of the costs incurred, based on a reasonable estimate of the total demand by entrants for the particular interconnection service or unbundled rate elements." FCC Order 96-325 at ¶750. To alleviate Sprint witness Hunsucker's concerns regarding over-or under-recovering of non-recurring cost, we think this issue may be dealt with in one of two ways: 1) through the use of a term payment or installment plan; or 2) by including the cost in recurring UNE charges. Whether the magnitude of a given non-recurring charge erects a barrier to entry presumably can only be determined on a case-by-case basis. The issue of the term over which payments for non-recurring charges should be made may be best left to negotiations between the parties, so that they may select a payment plan that best fits individual needs.

We find it appropriate that the inclusion of non-recurring costs in recurring rates shall be considered where the resulting

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[6]First Report and Order, cc Docket No. 96-98; cc Docket 95-185, In the Matter of Implementation of Local Competition Provisions in the Telecommunications Act of 1996; Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers, Order No. FCC 96-325 (released August 8, 1996) (Local Competition Order)

level of nonrecurring charges would constitute a barrier to entry.

VII: ASSUMPTIONS AND INPUTS OF CERTAIN ITEMS USED IN UNE COST

VII (a): NETWORK DESIGN

A. ARGUMENT

The Loop Worksheet of the Sprint TELRIC UNE Model Input Module is populated, in part ". . . with wire center-specific line counts and investments from the Sprint Loop Cost Model for all the loop types modeled (2-wire Voice Grade, 4-wire Voice Grade, DS0, DS1, ISDN-BRI, ISDN-PRI, Sub Loops, and dark Fiber)." As discussed in other issues, numerous values are input into the Sprint Loop Cost Model (SLCM) to yield loop investments; the investments input into the Loop Worksheet are subsequently used in other modules of Sprint's TELRIC UNE Model to derive TELRIC costs for specific loop types.

The Sprint Loop Cost Model (SLCM) designs a voice grade network that uses forward-looking technologies that can be currently deployed. The resulting network is capable of providing voice grade and advanced services over copper or fiber-based Next Generation Digital Loop Carriers (NGDLCs). SLCM's network allows for the provisioning of a range of services, including voice grade, ISDN, data services, digital subscriber line, and at bandwidths of DS-1 and DS-3, and higher.

SLCM's outside plant is designed so as generally to limit copper loop lengths, both feeder and distribution, to 12,000 feet (12 Kft), which eliminates potential performance-related issues. The model deploys a mixture of 26 and 24 gauge copper cables in the distribution plant, taking into account the industry standard Carrier Serving Area (CSA) design criterion of a maximum of 12 Kft of copper, regardless of cable gauge. Adherence to this standard allows higher bandwidth services to be provisioned within the CSA. SLCM's network also avoids bridged-tap by tapering of cables and placement of feeder distribution interfaces (FDIs). When the demand in a grid exceeds a user-specified demand level, the model uses NGDLCs instead of analog copper facilities.

The SLCM consists of various modules that are used to design and cost a forward-looking telecommunications network:

- Preprocessor Module formats some of the raw input data for further processing, identifies the locations of customers within the wire center, and builds the grid system and feeder plant routing used to design the loop. . . .

- Outside Plant Module designs and costs the loop plant and interoffice fibers that follow loop main feeder routes. . . .

The SLCM was derived from an earlier cost proxy model, the BCPM 3.1. Inputs used in the Sprint model are generally Sprint Florida-specific. New input tables were provided for ". . .services by wire center, interoffice working fiber quantities by route, DS3 deployment configurations, NGDLC costs, and DS3 quantities by grid." Toggles allow the user to turn off interoffice fiber placement and non-NGDLC electronics. Sprint's documentation indicates that "[t]he balance of the inputs and input tables remain consistent with the model's BCPM 3.1 predecessor."

1. Customer Location Methodology

Fundamentally, the SLCM overlays grids on wire center serving areas, clusters grids into serving areas, and designs an outside plant network sufficient to serve these serving areas. In addition to using line location formula, the model also specifically identifies its non-NGDLC based broadband services. "Sprint has used its actual DS3 demand and geo-coded the addresses in order to make the broadband fiber demand added to the plant consistent with its actual plant load." SLCM has an input table for lines of various types; the user can specify the number of DS3s to be modeled, at the wire center level. Non-voice grade services provisioned via NGDLC are input at the wire center level and are allocated to individual grids based on the number of multi-line business lines in the grids.

Like BCPM 3.1, SLCM uses census data at the census block (CB) level; while CBs vary in size, they typically reflect a standardized number of housing units. Accordingly, depending upon the density in a given CB, they can be quite small or quite large. The microgrid that SLCM overlays on CBs is roughly 1500 by 1700 feet; thus, in urban areas grids are often smaller than a CB, and several CBs will be assigned to a single grid.

The SLCM acknowledges that telephone engineers construct outside plant based on Carrier Serving Areas (CSAs) and Distribution Areas (DAs), not on a customer by customer basis. Given these two design concepts (defined later), engineers try to capture clustering of customers ". . .when implementing standard engineering practices that try to maximize the efficient use of plant, minimize the distribution portion of plant, and ensure adequate service quality."

According to the SLCM documentation, these are the steps in the customer location process:

- Assign Census Block Demographic Data to Wire Centers
- Establish Microgrids Within Wire Center Boundaries
- Assign Census Block Data to Microgrids
- Aggregate Microgrids to Ultimate Grids
- Establish Distribution Quadrants

Census block boundaries are established based on roads and natural borders, such as rivers. The CB data used by SLCM consists of household and housing unit line counts, based on 1990 census data updated using 1995 census statistics to factor in household growth by county. Business line count data by CB was obtained from PNR and Associates. First, data for CBs that fall within a wire center's boundary are assigned to the wire center. Where a CB crosses a wire center's border, the CB's housing and business data are allocated to the wire centers. If the census block is less than 1/4 of a square mile, the data is allocated to the wire centers based on the proportion of the CB's area in each wire center. If the census block is greater than 1/4 of a square mile, the housing and business line data is allocated based on the road mileage of the CB in each wire center.

A "microgrid" is defined as an area that is 1/200th of a degree of longitude and latitude. As noted above, while the exact dimensions of a microgrid will vary due to the earth's curvature, it typically will be about 1500 by 1700 feet. A wire center's serving area will be partitioned into microgrids, with no microgrid extending over the wire center's border. Accordingly, unless a census block falls within a single microgrid, all census blocks within the wire center serving area are overlaid with microgrids.

When a census block is larger than its associated microgrids, the next step is to allocate the CB's household and business line data to microgrids. If the CB is less than 1/4 of a square mile, the data is allocated based on the ratio of a given microgrid's area to the census block's total area. If the CB is greater than 1/4 of a square mile, the line data are apportioned based on road mileage. The Model Methodology states:

> That is to say, the lien data is apportioned based on the road length contained within a microgrid that traverses that CB, relative to the total road length contained within that CB. Since roads are used to locate customers, certain roads where customers are unlikely to reside, have been excluded from the road data. To illustrate the apportionment of household and business line data to microgrids based on relative road lengths, assume that the total road length associated with a particular CB is 60 miles and that 20 of those miles traverse a particular microgrid. Since (20 miles/60 miles) = .333, 1/3 of the household and business line data is associated with that particular microgrid. At the end of phase one of the grid process, the total census housing unit and PNR business line data associated with a wire center have been apportioned to each of the microgrids comprising that serving wire center.

The census housing unit and PNR business line data is trued up to Sprint Florida's actual line counts.

The next step is the aggregation of microgrids into larger grids, in order to simulate the creation of a serving area comparable to a carrier serving area (CSA). A CSA ". . .encompasses the entire design area potentially served from a particular digital loop carrier (DLC) site, including the feeder distribution interface, vertical and horizontal connecting cables, backbone cable and branch cable." The maximum size of these larger grids is a function of the housing and business line data and technological limitations. Generally speaking, the largest ultimate size grid allowed by SLCM is 1/25th of a degree longitude and latitude, or about 12 Kft by 14 Kft; such grids are referred to as macrogrids. In most cases, a macrogrid restricts the maximum copper distribution cable length, from the customer to the DLC, to 12 Kft. In a few cases the 12 Kft limit may be exceeded; where this occurs, SLCM uses 24 gauge cable instead of 26 gauge copper cable, and extended range line cards.

SLCM overlays macrogrids, consisting of 64 micrograms, on micrograms, which effectively creates fixed grid boundaries. According to the SLCM documentation, the algorithm that creates ultimate grids ". . . is actually a multistage process built to satisfy engineering constraints, minimize processing time, and simplify computer code." The basic procedure is:

> The derivation of grids is essentially an iterative process where partitioning occurs if the number of lines within a grid is too large, or if other technological constraints become binding. The macrogrid is partitioned into smaller grids, if warranted, based on household and business line data associated with the underlying micrograms, and CSA guidelines. The iterative process partitions the macrogrid into four equally sized subgrids. In some instances, these subgrids, which are 1/50th of a degree latitude and longitude in size, become the ultimate size for that composite of micrograms. In other instances, the number of lines within a subgrid is still too large. In those instances, additional sub-partitioning occurs for the subgrids. Additional sub-partitioning continues to occur until all grids satisfy line size and technological constraints. The smallest grid allowed is the 1/200th of a degree latitude and longitude, the microgrid. The resulting ultimate grids have a composite household and business line count equal to the sum of the household and business lines for the associated underlying micrograms.

Under certain circumstances the above partitioning process may yield small, isolated groups of micrograms within a macrogrid, that have fewer than 100 lines. In such a situation it is not appropriate to place a CSA within these groups. As noted in the Model Methodology, "Instead, these small groups of micrograms are aggregated with ultimate grids within the macrogrid in which they reside, that are equal to or larger in size, and are located closest to the road centroid of each small group of micrograms." Similarly, a partial grid may be created where a microgrid intersects a wire center boundary and it is not within a macrogrid. For partial grids that have fewer than 100 lines and are smaller than 1/5th of a macrogrid in area, which thus do not warrant a CSA, they are ". . .aggregated with the adjacent macrogrid that constitutes the longest border along that partial grid."

The final step is segmenting each ultimate grid into four distribution quadrants; each quadrant potentially is a distribution area. The road centroid of the grid is determined, which equals the latitude and longitude of the distribution quadrants. "The road centroid is calculated as the average horizontal and vertical point of all roads in the defined area." Next, a road centroid is computed for each of the quadrants. If there are no roads in a quadrant, then it is considered to be empty. As noted in the Model Methodology,

> For each non-empty distribution quadrant, the total area that falls within a 500-foot buffer along each side of the roads within that distribution quadrant is calculated. The DA is modeled as a square whose size is equal to the total buffer area. The center of each distribution quadrant's square DA is placed at the road centroid of the distribution quadrant.

The Sprint documentation contends this approach is reasonable because most households and businesses reside near roads; centering the DA at the road centroid rather than the geographic centroid puts facilities close to where customers would be located. Further, this approach acknowledges that rights of way for telecommunications structures typically are near roadways.

2. Outside Plant Methodology

A key assumption in SLCM is that the maximum copper loop length for each CSA is less than 12,000 feet. As noted above, to achieve this standard, the maximum size of an ultimate grid is generally restricted to 1/25th of a degree latitude and longitude, or about 12 Kft. by 14 Kft. Further, the design of the ultimate grids is such that the copper loop length from the DLC site to a customer should not exceed 18,000 feet.

The design of SLCM's feeder routes is done in the preprocessing stage. Initially, a maximum of four main feeders emanate from the wire center due east, west, north and south. Each main feeder runs for 10,000 feet, on the assumption that most customers reside within the perimeter of a town which is a gridded street complex. Beyond 10,000 feet, the direction of the main feeders depends on the locations of customer concentrations reflected in the microgrid data.

If the number of lines in the center 1/3 of a quadrant is greater than 30% of the quadrant's total feeder lines, the feeder will be a single feeder that may be pointed to the population centroid of the quadrant. Where this condition is not met, the feeder splits into two main feeders, with each potentially being aimed at the population centroid in one half of the quadrant. The sizing of each of these split main feeders is based on the number of customers it serves.

If the preprocessing logic indicates that a main feeder should be split at 10,000 feet from the central office, a calculation is performed to determine if this design yields the least cost network. The total feeder cable length assuming the feeder is redirected is compared to a design where instead the main feeder continues in a cardinal direction, with subfeeders extending at right angles to this main feeder. The program selects the option that yields the shortest total feeder cable length.

Subfeeders extend out from the main feeder to ultimate grids. In some cases a subfeeder may be shared by multiple ultimate grids. Subfeeders can branch off the main feeder every 1/200th degree of latitude and longitude within 10,000 feet of the wire center. The subfeeder extends vertically in the east and west quadrants, and horizontally in the north and south quadrants. Beyond 10,000 feet from the wire center, the rules for subfeeder branching differ:

> Along a main feeder beyond 10,000 feet of the wire center, subfeeder branches out at most, once between every 1/25th of a degree of boundary. For a split feeder that angles greater than 22 1/2 degrees from the direction of the original main feeder (away from the wire center), subfeeder emanates vertically upward or downward as appropriate, and horizontally outward away from the wire center, creating a fishbone pattern. For a split main feeder that angles less than 22 1/2 degrees from the original main feeder, subfeeder emanates outside of the subfeeder as explained above (away from the direction of the original main feeder cardinal line, i.e., due north, south, east or west) and emanates inside towards the cardinal line either horizontally for north and south directed main feeder or vertically for east and west directed main feeder. If the cardinal feeder line has extended from the 10,000 foot point, this interior

> subfeeder would create a right angle with the original cardinal line.

Where an ultimate grid's road centroid does not intersect a subfeeder, subfeeder 2 links the subfeeder to the road centroid. Where cable loop lengths exceed the copper/fiber breakpoint, SLCM establishes a digital loop carrier site within each CSA at the road centroid of an ultimate grid. The number of lines within the CSA drives the sizing and number of DLCs placed. Where a CSA is instead served by copper feeder facilities, a feeder/distribution interface (FDI) is placed at the road centroid of the ultimate grid, where the copper feeder is connected to the copper distribution facilities. Right and left connecting cables extend from the DLC site to the road centroid of each non-empty distribution quadrant.

SLCM provides for modeling two sizes of DLCs, with various capacities at the remote terminal and the central office terminal. Both large and small DLCs are assumed to be universal DLC (UDLC) for computing UNEs, but integrated DLC (IDLC) for UNE-P whose bandwidth is less than DS-1. Services at DS-1 and higher bandwidth are assumed to be provisioned with UDLC, for UNEs and UNE-P. The choice between a small and large DLC is a function of the number of lines to be served by the DLC and the engineering fill factor used.

The cabinet for a large DLC can accommodate up to 2,016 lines. The decision can arise whether to install multiple DLCs in an ultimate grid, or to further subdivide the grid. In the Model Methodology, Sprint states that:

> Whether more DLCs are placed in that CSA depends on whether sound engineering practices call for another DLC or whether it is optimal to divide a grid further, into smaller ultimate grids, each representing a CSA. For example, it is possible for a single CSA to serve 5,000 customers if a large number of customers are located in a single office complex. In this case, multiple DLC cabinets/systems would be installed to provision the 5,000 lines.

The costs associated with the NGDLC placed at a site is allocated to the services provided out of that DLC. Site cost, power, framing, and cooling are allocated between services based on space occupied. In contrast, the optical and common equipment is assigned to services based on bandwidth used. The costs of service-specific plug-in cards are directly assigned. In the Model Methodology, Sprint states that "[i]n order to extend system common equipment capacity in large NGDLC systems a separate digital data multiplexer is used for all DS1 equivalent services including DS1, ISDN-PRI, and HDSL. Voice grade POTS, ISDN-BRI, coin, and DS0 services remain in the large system channelized equipment shelves."

SLCM has a default value of 12,000 feet as the copper/fiber breakpoint. If the maximum loop length from the wire center to any customer is less than 12 Kft., the model places copper feeder cable. Where any customer's loop length in the CSA exceeds 12 Kft., fiber feeder is placed to serve all customers. In the Model Methodology, Sprint states that "[f]or all loops, cable beyond the DLC site is copper except for DS3s that have fiber distribution placed parallel to the copper backbone for half of the backbone length (an average distribution distance in the quadrant)."

Copper feeder cables are based on the total number of working lines (residential, business and special access) adjusted by an engineering fill factor. The sizing of fiber feeder cables is similar, but differs by system size. Due to different transmission protocols, small and large DLC systems cannot share fiber strands. Four fibers can handle the 2,016 maximum voice grade capacity of a large DLC; an additional four fibers would be required for each additional 2,016 increment. Small systems require four fibers per 672 voice grade channels; an additional four fibers would be required per additional 672 channels. Under certain circumstances fiber feeder can be shared by DLC systems:

> Where an NGDLC shares a feeder with a like NGDLC system and is not at full capacity, the capacity of adjacent systems is matched so that wherever possible fibers can be shared among the NGDLC locations. Shared fibers along a route configure similar to a folded optical ring. For example, if three small systems on a single feeder all sum to less than the total backplane capacity, there will be two fibers from the office to system one, two fibers from system one to system two, two fibers from system two to system three, and two fibers from system three back to the office. In that way all three systems use a total of four fibers.

For any given fiber feeder segment, the segment's total capacity equals the required large DLC strands plus the required small DLC strands plus DS3 strands, and interoffice strands.

DS3s are either allocated or directly assigned to grids. Based on the number of DS3s in a grid, the optical system capacity, and the number of systems required, the number of fibers needed for the systems are determined via reference to a table. The table contains data on electronic fill factors and reflects Sprint's SONET architecture.

If SLCM's dark fiber toggle is on, the model will build interoffice fibers into the main feeder cables. This is accomplished in the following manner:

> An input table is structured to allow input of interoffice trunk quantities along any of eight geographical directions. For example, an eastward feeder may split into two paths resulting in a feeder leg South of East and another North of East. In this way, interoffice fibers are placed into the feeder most likely to approximate the actual route taken by the facilities. Logic in the model finds the grid at the end of the main feeder in the designated direction and adds the capacity to other fiber requirements. Since the main feeder stops within the last grid but does not extend to the boundary, a separate interoffice cable is placed from the end of the feeder to the boundary.

As noted above, other than those ultimate grids that remain as micrograms, each ultimate grid is considered a CSA, and is divided into four possible quadrants or distribution areas (DAs). The model determines the quantities of horizontal and vertical connecting cables, and backbone and branch cables by:

> For modeling purposes, a road reduced area is developed as the area encompassed by a 500 foot buffer along each side of the livable roads (e.g., excluding limited access freeways and underpasses). While the road reduced area is a simulation of reality, it is easy to conceptualize as a square centered about the road centroid of the distribution quadrant. The road reduced area is equal to the area encompassed by a 500 foot buffer along each side of the roads within the distribution quadrant. No

> distribution facilities are placed within a distribution quadrant that does not have any roads, i.e. a non-populated distribution quadrant. The location of the centroid of the road reduced area (with respect to the road centroid of the ultimate grid itself) determines the distance the horizontal and vertical connecting cables must traverse. The size of the road reduced area and the number of customers in the distribution quadrant determines the length of the backbone and branch cable. The road reduced area is not used to locate customers, but as a modeling tool to determine likely cable distances required to serve customers in the distribution quadrant.

To determine the number of feeder/distribution interfaces to place in an ultimate grid/CSA, SLCM checks the cable sizing in the grid. An FDI is placed at the road centroid (the center of the road reduced area) within each populated quadrant when distribution cable size exceeds 1,200 pairs. For ultimate grids with distribution cables equaling less than 600 pairs, SLCM calculates the cost of placing a single FDI within such ultimate grid; this amounts to collocating the FDI with the DLC. Where this occurs, horizontal and vertical connecting cable is placed ". . .from the ultimate grid road centroid to the road centroid of a non-empty quadrant's road reduced area." For ultimate grids/CSAs with between 600 and 1,200 lines, the costs of placing two FDIs are modeled. This implicitly means that the two distribution quadrants to the right of the DLC site share one FDI, and the two distribution quadrants to the left of the DLC site share an FDI.

Backbone and branch cable distances are computed based on the volume of the road reduced area. In the Model Methodology, Sprint states that:

> While the cables might be placed in a different location, it is easy to think of a backbone cable as emanating up (north) and down (south) from the center of the road reduced area. Branch cable is placed at 90 degrees from the backbone cable to each terminal. . . . The final piece of distribution cable, the drop, extends from the branch cable to the middle of the customer's lot and is capped at 500 feet. Lot size within a distribution quadrant is based on the distribution quadrant's average lot size, determined by dividing the road reduced area of

> the distribution quadrant by the number of locations, i.e. housing units structures and business locations, within that distribution quadrant. Thus, lot size may vary across distribution quadrants within an ultimate grid.

The SLCM limits the maximum length of the sum of all cable types within a distribution quadrant to the length of the road network within that quadrant.

The SLCM contains various rules pertaining to placement of cable in distribution plant:

- Within a grid, if the length of copper from the DLC to the last lot in a quadrant is less than 11,100 feet, 26 gauge cable is used to serve all customers. In those circumstances where the distance from the DLC to the last lot is greater than 11,100 feet, 24 gauge wire is used in all cables to and within the distribution quadrant. Where distances exceed 13,600 feet, extended range line plug-ins are installed on lines that exceed 13,600 feet.
- The mix of aerial, buried and underground facilities is determined by terrain and density specific to that grid.
- Terminals
    - Exterior Drop terminals are provided at each point where drops connect to branch cables and are sized for the number of connecting drops.
    - Indoor terminals are placed on each multi-tenant building and are sized for the number of lines terminated at that location.
    - Different NIDs are used for business and residence locations. One housing is included for each living unit or business location, in addition to one protector and interface per drop pair terminated.
    - Terminal cost input tables include entries for separate components of the installation process.
- Cables are sized using the following basic rules:
    - Branch cables are sized to the number of pairs for housing units and business locations. (The calculation takes the number of housing units times pairs per housing unit and the greater of actual business pairs per location or business locations times pairs per location.)

- Each backbone cable is sized to carry ½ of the branch cable pairs to the FDI as well as any non-voice grade pairs needed to connect NGDLC specialized circuits to the customer premises. An input table is used to match the pairs required with the service.
- Cables throughout the feeder system are sized based on the actual number of pairs used from the FDI back to the switch. Sprint uses actual line volumes by populating the lines input table to determine the number of pairs.

Although the number of pairs per residential and business user is a user-adjustable unit, the model's default values are two pairs per residence and six pairs per business. If the actual number of business lines (including special access lines) exceeds the user-specified number per location, SLCM uses the actual number of business lines.

The SLCM computes the total loop length by totaling the lengths of the following outside plant components:

- Linear distance of the feeder to the subfeeder;
- Linear distance of the subfeeder to the subfeeder part 2;
- Linear distance of the subfeeder part 2 to the DLC;
- Length of the vertical cable;
- Length of the horizontal cable;
- Half the length of the branch cable;
- Half the length of the backbone cable; and
- Length of the drop cable.

A user can cap the maximum dollar amount of loop investment, either at the wire center level or at a global level. If the user, e.g., caps loop investment at $10,000, each loop whose investment calculated by SLCM exceeds this amount, will be capped at $10,000. The model also incorporates terrain data from the U.S.G.S. and the Soil Conservation Service; this date is used to account for higher placement costs in certain regions.

Two types of structure sharing are accommodated in the Model. First, SLCM allows for user-specified inputs to account for sharing of poles and conduit with non-Sprint entities. In addition, according to the Model Methodology "[T]he user can set the amount of sharing on the type of placement activity incurred such as plowing, rocky plowing, and cable boring as well as the structure units such as manholes and poles." Second, sharing can occur where distinct fiber and copper cables follow the same route; where this occurs, structure costs are allocated between the cables prior to their assignment to grids. In the Model Methodology, Sprint states that "Structure shared among cables will occur whenever fiber is placed in distribution for DS3 services, when fiber interoffice facilities follow a copper only main feeder, or when fiber served and copper served grids use the same feeder routes."

No ALEC party submitted any testimony on this issue; however, in its brief FDN submitted various criticisms of the SLCM. In its brief KMC indicates that it concurs with FDN's position and its critique.

FDN observes in its brief that the SLCM is based on the Benchmark Cost Proxy Model (BCPM) and notes that the FCC evaluated the BCPM and the HAI model as possible platforms for determining the cost of universal service for non-rural carriers. Referring to FCC Order 98-279 (the FCC's Universal Service Platform Order), FDN points out that the FCC expressed its preference for the use of geocoded data to ascertain customer locations, as advocated by the sponsors of the HAI model, while endorsing BCPM's road surrogating approach where actual customer location data are not available. FDN notes that Sprint chose to input geocoded data for its DS3 customers into the SLCM, but FDN criticizes Sprint for not using geocoded data for any other customers. FDN contends that such geocoded data ". . . is clearly available and Sprint should be required to use it."

Next, FDN discusses gridding versus clustering approaches to determine groupings of customers to whom plant eventually will be constructed. FDN notes that in its Platform Order the FCC discussed certain failings of gridding techniques, while ultimately endorsing clustering approaches as being preferable because they can better account for natural groupings of customers. FDN states that in the BellSouth phase of this proceeding all parties were in general agreement that BellSouth's model, the BSTLM, which incorporates a clustering approach, was appropriate. FDN contends that ". . . two factors that helped the BSTLM best account for customer locations were BellSouth's use of geocoded data and a clustering approach. . . ." and concludes "Sprint should be required to do the same."

FDN states that Sprint models stand-alone UNE loops assuming 100% use of universal digital loop carrier (UDLC), but models loop/port combinations provided as a UNE-P assuming an integrated digital loop carrier (IDLC) architecture. FDN then proceeds to argue that ". . . use of DLC does not inhibit the ability to provide an unbundled voice loop nor does it inhibit the ability to provide DSL over loops served by DLC." FDN quotes from the FCC's Third Advanced Services report regarding the ability of "combo" cards used in NGDLC systems to provide xDSL services. FDN alleges that ". . .use of these line cards will allow ILECs to provide both voice and data functionality on an unbundled basis even if DLC is utilized." FDN opines that regardless of whether IDLC is being deployed ubiquitously for unbundled loops in Sprint's network, the recent Supreme Court decision in Verizon Communications, et al. v. Federal Communications Commission, et al., 152 L.Ed. 2d 701, 122 S. Ct. 1646 (2002) requires such an assumption.

B. DECISION

As noted above, there is no testimony from any party on this issue other than Sprint. The only opposing discussion arose in FDN's post-hearing brief; accordingly, initially we will address FDN's claims.

FDN asserts that Sprint should be required to use geocoded data in conjunction with a clustering technique. FDN claims that a cost model that incorporates geocoded data on actual customer locations is superior to one that does not, and that such data is "clearly available." Moreover, FDN contends that the FCC has previously concluded that clustering approaches better reflect natural customer groupings.

We agree that use of a clustering approach with geocoded data is the preferable cost modeling approach for outside plant. We note that we previously reached a similar conclusion in our Universal Service Order:

> We believe that, on balance, a model that incorporates a clustering approach in conjunction with geocoded data can better design outside plant facilities.

Order No. PSC-99-0068-FOF-TP, issued January 7, 1999, in Docket No. 980696-TP. However, FDN's assertion that the geocoded data that it advocates Sprint be required to use are "clearly available," is not supported by this record. Other than for DS3 customers, there is no record evidence that Sprint has performed the extensive analysis needed to geocode customer locations throughout its service area. Thus, we cannot find that Sprint should be ordered to "use" such data in its model. Without such geocoded data, it does not appear possible to perform a clustering analysis.

FDN alleges that Sprint should be required to model stand-alone loops as though they were provisioned using IDLC systems. In support of this position, FDN offers an excerpt from the FCC's latest Advanced Services report concerning how a "combo" card provides DSLAM functionality in a DLC system; an excerpt from the FCC's Project Pronto Order describing how SBC proposed to offer a combined voice and data offering; and an excerpt from an order from another state commission. FDN notes that "Sprint contends that it does not model IDLC for unbundled loops because it is not technically feasible to provide a single unbundled loop path for loops served by DLCs." We do not believe that the anecdotal references contained in FDN's brief constitute competent substantial evidence for us to conclude whether or not a single DS0 voice channel provisioned via an IDLC system in fact can be delivered to an ALEC as an unbundled loop. Absent record evidence to the contrary, we find that Sprint witness Dickerson's claim is uncontroverted.

We acknowledge that virtually any cost model will have some deficiencies; by their nature we believe cost models attempt to yield a reasonable estimate of the cost of a UNE, a service, or whatever the cost object may be. We readily agree that superior, alternative modeling techniques may have been developed since BCPM, from which the SLCM was derived, was created. However, no alternative to the SLCM is available in this record. Nevertheless, we believe that the design reflected in the SLCM is reasonable, as are the investment amounts derived from the model used to estimate loop costs. Moreover, we note that we came to a similar conclusion in Docket No. 980696-TP, the Universal Service docket. After weighing the advantages and disadvantages of the two competing cost models in that proceeding, we concluded that the BCPM 3.1, the basis for SLCM, was the preferable of the two.

We find it appropriate that the network design reflected in the SLCM shall be accepted for purposes of establishing recurring UNE rates in this proceeding, subject to our adjustments in other sections of this Order.

VII (b): DEPRECIATION

A. ARGUMENT

Sprint witness Dickerson testifies that the FCC's TELRIC pricing requirement for unbundled network elements requires the depreciation component of TELRIC be based on forward-looking economic lives of the underlying UNE asset categories. FCC Order 96-325 at ¶703.[7] Accordingly, witness Dickerson states that Sprint has developed forward-looking economic lives for all UNE asset categories and normally utilizes these lives in its UNE cost studies. In this filing, however, witness Dickerson explains that Sprint has made what it hopes this Commission will find to be an appropriate and practical concession, and has used the depreciation lives approved for BellSouth in this proceeding. See Order No. PSC-01-1181-FOF-TP, issued May 25, 2001, and Order No. PSC-0102051-FOF-TP, issued October 18, 2001. Those inputs are shown in Table 7(b)-1.

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[7]First Report and Order, CC Docket No. 96-98, In the Matter of Implementation of Local Competition Provisions in the Telecommunications Act of 1996, FCC Order 96-325 (release August 8, 1996) (First Report and Order).

TABLE 7(b)-1: Live and Salvage Inputs		
Account	**Life (Yrs.)**	**Salvage (%)**
Motor Vehicles	8	16
Special Purpose Vehicles	7	0
Garage Work Equipment.	12	0
Other Work Equipment	15	0
Buildings	45	0
Furniture	15	10
Office Support Equipment	11.5	5
Computers	4.5	2
Digital Switching	13	0
Operator Systems	10	0
Radio	9	(5)
Circuit Equipment	9	0
Station Apparatus	6	0
Other Terminal Equipment	6	5
Poles	36	(55)
Aerial Cable Metallic	18	(14)
Aerial Cable Fiber	20	(14)
Underground Cable Metallic	23	(8)
Underground Cable Fiber	20	(8)
Buried Cable Metallic	18	(7)
Buried Cable Fiber	20	(7)
Submarine Cable Metallic	18	(5)
Submarine Cable Fiber	20	(5)
Intrabuilding Cable Copper	20	(10)
Intrabuilding Cable Fiber	20	(10)
Conduit	55	(10)

Source: Order No. PSC-01-1181-TP, pp. 172-174; PSC-01-2051-FOF-TP, p.30.

B. DECISION

As noted in the post hearing positions of the parties participating in the Sprint proceeding, all have agreed with Sprint to use the depreciation inputs as ordered by Order No. PSC-01-2251-FOF-TP for BellSouth. Sprint states:

> By adopting the depreciation rates approved for BellSouth, Sprint-Florida recognizes that the economic lives and salvage values of its forward-looking investment are similar to that of BellSouth. The economic lives of Sprint-Florida and BellSouth's network investments are both shaped by the common effect of technology changes, market competition, and physical wear and tear thus resulting in common depreciation rates.

We agree with Sprint and the parties that it is reasonable to assume that similar plant exposed to similar factors of obsolescence such as technology, market competition, and physical wear and tear would exhibit similar depreciation lives and salvage values.

In conclusion, the appropriate lives and net salvage values to be used in the development of Sprint's forward-looking recurring unbundled network element (UNE) cost studies are those proposed by Sprint as shown on Table 7(b)-1.

VII (c): COST OF CAPITAL

A. ARGUMENT

Three witnesses offered testimony regarding the forward looking cost of capital input for Sprint's cost model. Sprint witness Staihr recommends 12.26% as the forward looking cost of capital based on a cost of equity of 13.10%, a cost of debt of 7.81% and a capital structure consisting of 84.02% equity and 15.98% debt. Z-Tel witness Ford recommends a forward looking cost of capital of 8.50% based on a cost of equity ranging from 10.0% to 10.1%, a cost of debt ranging from 6.10% to 6.25%, and a capital structure consisting of 60% equity and 40% debt. For Sprint, staff witness Draper recommends 9.86% as the appropriate forward looking cost of capital based on a cost of equity of 11.49%, a cost of debt of 7.43%, and a capital structure consisting of 60% equity and 40% debt.

1. Cost of Equity

Sprint witness Staihr employs a discounted cash flow model (DCF) and a capital asset pricing model (CAPM) in determining his recommended cost of equity. He applies these models to a group of publicly traded firms that he believes are comparable in risk to Sprint.

To determine his comparable group, witness Staihr uses four risk measures: the common equity ratio, the cash-flow-to-capital ratio, the pre-tax fixed charge coverage ratio, and the revenues-to -net plant ratio. Witness Staihr believes these risk measures capture both business and financial risk. Using cluster analysis - a statistical technique - and 621 firms from Standard and Poor's (S & P) Research Insight database, witness Staihr identifies 20 firms that he believes have the closest risk measures to Sprints risk measures.

Witness Staihr states that, in making comparisons of firms' ratios to Sprint's ratios, it is important to obtain a group of firms whose combined, cumulative data comes closest to the data of Sprint. Witness Staihr believes telecommunications firms are not necessarily an appropriate proxy for Sprint.

The DCF model determines investors' required return by matching a firm's current market price with expected cash flows discounted at the investors' required return. For his DCF model, witness Staihr uses a constant growth quarterly compounding model. He uses stock prices for his comparable group of companies for the period June 25, 2001 to July 9, 2001. For the dividend growth rate of his comparable companies, witness Staihr uses the five-year average earning per share growth rate estimated by the Institutional Brokers Estimate System (IBES). He believes that earnings growth is an appropriate indicator of long-term dividend growth. The result of his DCF model is 13.71%.

The CAPM is a risk premium model that defines the investors required return as the risk-free return plus a risk premium based on the overall return on a market index and beta, a risk measure for individual stocks. Witness Staihr uses a risk-free rate of 6.00%, which is based on September 2001 U.S. Treasury bond futures traded from June 25, 2001 to July 9, 2001. Witness Staihr's market risk premium is 7.27% and is derived from the risk premium of common stocks over U.S. Treasury bond returns from 1926 to 2000. The 6.00% risk-free rate and the 7.27% market risk premium, when added together, indicate a return on the overall market of 13.27%. Witness Staihr states this return is reasonable because a DCF analysis on the 621 firms from his cluster analysis indicates a return of 15.08%. With a beta of .86 based on his 20 comparable companies, witness Staihr calculates a CAPM result of 12.21%.

Adding 14 basis points for issuance costs associated with issuing common stock, witness Staihr states the range for Sprint's cost of equity is 12.35% to 13.85%. His recommended 13.10% cost of equity is the midpoint of this range.

Z-Tel witness Ford bases his recommended cost of equity on the cost of equity set by this Commission for BellSouth in Order No. PSC-01-1181-FOF-TP, issued May 25, 2001. Specifically, he employs a CAPM to determine his recommended cost of equity. Witness Ford notes that there are irregularities in the inputs used for the CAPM in the BellSouth Order. He provides corrections to those inputs.

For the risk-free rate, witness Ford uses 5.31% based on the yields on U.S. Treasury bonds from October 2001 to December 2001. Witness Ford uses 8.34% as the market risk premium, which is based on the 20 year period from 1982 to 2001. Witness Ford believes historical risk premiums are appropriate. He notes that there are many methods for estimating the market risk premium and that Verizon witness James Vander Weide used a 7.8% risk premium in his testimony in the recent Florida Power rate case, i.e., Docket No. 000824-EI. For the beta input, witness Ford uses a beta of .58. This is based on the average beta, as reported by BARRA, for Verizon, BellSouth, and SBC for the period January 2001 through December 2001.

Witness Ford's CAPM result is "about 10%." We note that witness Ford's CAPM results range from 10.0% to 10.1%.

Staff witness Draper applies a DCF and CAPM analysis to an index of telecommunications companies listed in the Value Line Investment Survey. He believes these companies are comparable to the business and financial risk associated with the provision of UNEs. He eliminated telecommunications companies that receive less than 75% of their revenue from telecommunications operations. He also eliminated companies with insufficient financial data and companies that were the subject of an ongoing merger or acquisition.

For his DCF analysis, witness Draper notes that the cost of equity is the discount rate that equates the present value of expected cash flows associated with a stock to the market price of the stock. He employs a two-stage DCF model with stock prices from October 2001 and dividend and growth inputs from Value Line. He allows 3% for issuance costs. The result of his DCF analysis for his index of telecommunications companies is 11.45%.

Witness Draper's CAPM result is 11.02%. He notes that the CAPM is dependent on the beta statistic, which measures risk that cannot be diversified away, i.e., systematic risk. Using a DCF analysis and inputs from Value Line, witness Draper calculates a required return on the overall market of 10.87%. His risk-free rate is 5.4% based on the forecasted rate on 30-year U.S. Treasury bonds. The beta for witness Draper's CAPM is 1.02 and is based on the average beta for his index of telecommunications companies.

Witness Draper notes that the average bond rating for his index of companies is single A and Sprint's bond rating is triple B. To allow for this additional risk, witness Draper adds 25 basis points to the average of his models, 11.24%, to obtain his recommended cost of equity for Sprint of 11.49%.

In rebuttal to witnesses Draper and Ford, Sprint witness Staihr states that the use of telecommunications firms as a proxy for determining Sprint's required return is an assumption. In contrast, witness Staihr states that he used four measures and cluster analysis to measure risk and identify the appropriate proxy group for Sprint.

Witness Staihr states that witness Draper's index includes AT&T and Telephone & Data and that these two firms receive a minority of their revenue from local telephone service. Witness Staihr reproduces witness Draper's DCF model excluding AT&T and Telephone & Data, which produces a result of 13.5%. Witness Staihr disagrees with witness Draper's calculation of the required market return. In calculating this number, witness Draper excluded firms that have growth rates above 20%. Witness Staihr believes the return should be calculated for the entire market. Witness Staihr adjusts witness Draper's CAPM result for this and obtains a CAPM result of 11.94%. Witness Staihr states that the corrected cost of equity using witness Draper's analysis is 12.97%.

Regarding witness Draper's DCF model, witness Ford disagrees with the growth rate inputs. He believes witness Draper's sustainable growth rate is too high to be sustainable. Witness

Ford believes witness Draper should have excluded Qwest Communications and CenturyTel from his index, and that Sprint is a reasonable inclusion. Using his adjustments to witness Draper's two-stage DCF model, witness Ford calculates a range of 8.49% to 10.56%.

Regarding witness Draper's CAPM analysis, witness Ford notes his disagreement with witness Draper's comparable group. In addition, witness Ford believes that witness Draper's beta, 1.02, is too high. He specifically disagrees with witness Draper's use of Value Line betas.

Incorporating his adjustments to witness Draper's CAPM, witness Ford calculates a range of 8.40% to 8.58%. With his adjustments to witness Draper's models, witness Ford states the cost of equity is "about 9%." He believes the upper boundary for the cost of equity is 10.50%.

Regarding the comparable group of companies used by the witnesses, we note that in the BellSouth UNE proceeding we used telecommunications firms as the basis for the cost of equity and that we rejected the use of non-telecommunications firms. Order No. PSC-01-1181-FOF-TP, issued May 25, 2001 at pp. 181-182. Sprint witness Staihr claims that the four risk measures he uses objectively select the 20 firms most comparable in risk to Sprint. However, he acknowledges that some of those 20 companies might be different if other risk measures were used. He does say there is no reason to think they would be different. Witness Staihr acknowledges that a firm's bond rating is a forward looking assessment of its creditworthiness. The companies in his comparable group have S & P bond ratings ranging from BB+ and "not rated" to AA-. We find that the bond ratings suggest significant variability in risk for Staihr's comparable companies.

Further, witness Staihr's comparable group consists of very profitable companies in competitive industries. In preparing his testimony, witness Staihr did not review the level of competition that Sprint-Florida faces and he did not review the telecommunications industry. For the above-cited reasons, we find that witness Staihr's comparable group of companies is not a useful proxy for determining the cost of equity related to unbundled network elements.

Both witnesses Staihr and Ford object to witness Draper including Telephone & Data and AT&T in his index of companies because, they state, these companies do not rely primarily on local telephone service. We note that the companies witness Draper uses are considered telecommunications companies by Value Line. Witness Draper's companies receive at least 75% of their revenue from the provision of telecommunications services, though not necessarily local exchange service. We find that witness Draper's index of companies is acceptable.

In determining the expected return on the market input for his CAPM model, witness Draper eliminated firms with growth rates in excess of 20%. He also eliminated firms that do not pay dividends or have negative projected dividend and earnings growth. We find this is appropriate. We believe that growth rates in excess of 20% are not sustainable in the long run. See Order No. PSC-01-1181-FOF-TP at pp. 181-182.

However, we do not agree with witness Ford that witness Draper's long-term sustainable growth rate, 10.3%, is excessive. Witness Draper based this rate on Value Line's projected return on equity and earnings retention rate for his index of companies. The long-term growth rate is matched with a near-term growth rate of 3.3%. By operation of math, the near-term growth rate has a significant effect on the DCF result. We find that, taken together, these growth rates produce a reasonable and sustainable growth rate for determining the cost of equity. In contrast, witness Staihr's DCF model uses an average annual growth rate, based on earnings growth of his comparable companies, of 11.96%. The individual growth rates range as high as 15.80%.

We also disagree with witness Ford's objections to the beta statistic in witness Draper's CAPM. Specifically, witness Ford objects to the use of Value Line betas. Witness Ford essentially second-guesses Value Line's calculation of the beta statistic. We note that witness Staihr, in addition to witness Draper, used Value Line betas. Witness Draper states that the average beta for his index companies is reasonable.

We note the wide difference between the cost of equity recommended by witness Staihr, 13.1%, and the 10% recommended by witness Ford. As noted above, we believe witness Draper employed a reasonable proxy group of companies and reasonable inputs for his models. Therefore, we find it appropriate to use 11.49% as the cost of equity in determining Sprint's cost of capital.

2. Cost of Debt

Sprint witness Staihr recommends 7.81% as Sprint's forward-looking cost of debt. He bases this on a 6.00% risk-free return calculated from 20-year U.S. Treasury bond futures. To this he adds a credit spread of 173 basis points based on the yield spread between "A" rated 20-year telephone bonds and 20-year U.S. Treasury bonds. He states that 7.81% is the rate at which Sprint could issue debt in July 2001.

Z-Tel witness Ford recommends a cost rate for debt of 6.10% to 6.25% for Sprint. He bases this on the debt cost rate calculation in Order No. PSC-01-1181-FOF-TP. He incorporates short-term debt into his recommendation. The long-term debt cost rate is based on the yield spread of Aaa public utility bonds over 30-year U.S. Treasury bonds for the period starting in March 1995 and ending in February 2000.

For Sprint, staff witness Draper recommends 7.43% as the appropriate forward-looking cost of debt. He incorporates a short-term debt cost rate of 5.36% based on the forecasted prime rate. His long-term debt cost rate, 8.12%, is based on the forecasted rate for 10-year Treasury bonds and a credit spread derived from the yields on BBB rated utility bonds. Witness Draper calculates the credit spread during the twelve month period that ended with November 2001. He assigns a 25% weight to short-term debt and a 75% weight to long-term debt.

In rebuttal, witness Ford disagrees with witness Draper's credit spread in calculating the long-term debt cost rate. Witness Ford believes this calculation should be based on the method this Commission used in the BellSouth UNE proceeding. Witness Ford notes that the credit spread for BellSouth was formulated using credit spreads calculated over a short period and a long period. He recalculates witness Draper's long-term debt cost rate for Sprint at 7.55%. Also, witness Ford disagrees with witness Draper's short-term debt cost rate because witness Draper bases his short-term cost rate on the prime rate.

We note that witness Staihr calculated a credit spread over a two week period, whereas witness Draper used a twelve-month period.

We find that witness Draper's use of a twelve month period is reasonable. The record allows for many choices of periods over which the credit spread is calculated. In the BellSouth Order, we chose an average of credit spreads calculated over three month and five year periods. Order No. PSC-01-1181-FOF-TP at pp. 184-185. We disagree with witness Ford that exact consistency with the BellSouth Order is necessary for determining the cost of capital inputs. In addition, witness Draper tailored his recommended cost of debt for Sprint to match Sprint's bond rating.

Witness Staihr disagrees with the use of short-term debt in calculating the debt cost rate, whereas witness Ford agrees with the use of short-term debt but recommends the commercial paper rate as the appropriate proxy for short-term debt. Witness Draper uses forecasted prime rates as the basis for the short-term debt cost rate. We find that this is forward-looking and therefore acceptable. For Sprint, the appropriate forward-looking cost rate for debt is 7.43%.

3. Capital Structure

For Sprint, witness Staihr recommends a market-value capital structure as the forward looking capital structure. This market-value capital structure consists of 84.02% equity and 15.98% debt. He calculates this capital structure based on the market value of Sprint's debt and the market-to-book ratio for his comparable group of companies. He notes that this resulting market value is reasonable compared with the values suggested by recent LEC acquisitions. He also notes that his recommended capital structure is consistent with capital structures presented to (or filed with) this Commission in recent UNE proceedings in this docket.

Z-Tel witness Ford employs a capital structure consisting of 60% equity and 40% debt based on this Commission's BellSouth UNE proceeding. Staff witness Draper also recommends a capital structure with 60% equity and 40% debt. He bases this on our Order issued in the BellSouth phase of this proceeding. He notes that the average equity ratio for Value Line's telecommunications companies is 63% as of November 2001. Also, C.A. Turner Utility Reports, a recognized financial publication, states that the average equity ratio for telecommunications companies is 57.60% in 2000.

Witness Staihr rebuts the capital structure positions taken by witnesses Ford and Draper. Witness Staihr believes that only a market-value capital structure is appropriate for calculating the forward-looking cost of capital. He notes that witness Draper's cost of capital would be significantly higher with a market-value capital structure. Witness Staihr refers to authoritative sources that recommend market value capital structures in calculating the cost of capital.

We addressed the issue of an appropriate capital structure in the BellSouth phase of this docket. For BellSouth, we noted that market-value capital structures have not been widely accepted and produce aberrant coverage ratios. See, Order No. PSC-01-1181-FOF-TP at pp. 185-187. The record in this case continues to support the contention that market-value capital structures are not widely accepted. In addition, a capital structure with 60% equity is in agreement with Sprint's target book value capital structure, which it uses for planning purposes. We infer from this that a 60% equity ratio for Sprint is forward-looking. The FCC does not require the use of market-value capital structures in calculating the forward-looking cost of capital. For these reasons, we find that a capital structure for Sprint consisting of 60% equity and 40% debt is appropriate.

B. DECISION

We find that witness Draper's cost of capital is forward-looking. For Sprint, we find a forward-looking cost of capital of 9.86% based on a cost of equity of 11.49%, and cost of debt of 7.43% and a capital structure that is 60% equity and 40% debt is appropriate. The positions of the parties, as well as our determinations, are summarized in the table below:

TABLE 7(c)-1: Sprint Cost of Capital Summary				
	Sprint witness Staihr	Z-Tel witness Ford	Staff witness Draper	Commission Approved
Capital Structure	84.02% equity, 15.98% debt	60% equity 40% debt	60% equity 40% debt	60% equity 40% debt
Cost of Debt	7.81%	6.1% to 6.25%	7.43%	7.43%
Cost of Equity	13.10%	10% to 10.1%	11.49%	11.49%
Overall Cost of Capital	12.26%	8.5%	9.86%	9.86%%

VII (d): TAX RATES

A. ARGUMENT

In his direct testimony, Sprint witness Dickerson states:

> Sprint's filing utilized the Federal and State income tax, state as valorem tax, and the Regulatory Assessment Fee tax rates currently in effect in Florida. The Federal and State income tax and state ad valorem tax are reflected in the specific inputs utilized in Sprint's annual charge factor development, which are contained in the ACF section of the cost study documentation. The Regulatory Assessment Fee Tax is included in the common cost factor development and application.

As set forth in Witness Dickerson's direct testimony, the federal income tax rate is 35% and the state income tax rate is 5.5%. This results in a combined (composite) tax rate of 38.58%. A composite tax rate is used to account for the state income taxes that are deductible for federal income tax purposes. Sprint also used an ad valorem tax rate of .72%. The ad valorem tax rate is calculated by dividing the property tax expense for Sprint by the beginning balance of property, plant, and equipment investment.

The Regulatory Assessment Fee is included in Sprint's model as an adder to the Common Factor at a rate of .15%.

B. DECISION

Based on the record in this proceeding, we find a composite federal and state income tax rate of 38.58%, an ad valorem tax rate of .72%, and a Regulatory Assessment Fee rate of .15% appropriate. It should also be noted that all of the parties have either agreed with Sprint's position or have taken no position on the Florida-specific tax rates that are utilized by Sprint-Florida.

The appropriate inputs for Florida-specific tax rates shall be as follows: a combined (composite) federal and state income tax rate of 38.58%, an ad valorem tax rate of 0.72%, and a Regulatory Assessment Fee rate of 0.15%.

VII (e): STRUCTURE SHARING

A. ARGUMENT

In his direct testimony, Sprint witness Dickerson describes structure sharing as the percentage of poles, buried cable, and conduit excavation costs which Sprint shares with other companies. The percent of the structure cost applied to the ILEC is the percent of costs applied to telephone. For underground and buried feeder and distribution cables, structure sharing inputs, for most of Sprint's customers, were set at 90 percent. This input provides a 10 percent level of structure sharing that exceeds what Sprint is currently experiencing in Florida, and allows for future additional structure sharing opportunities. Due to the fact that when using plowing construction, the trench is closed as the cable is placed, the structure sharing input for plowing was set at 100 percent since there is no opportunity to share the trench. Based on Sprint's experiences in both leasing poles from other entities and allowing other entities to lease its poles, it sets its structure sharing input for poles at 31 percent for all density zones.

Regarding the limited opportunities to share below ground construction costs with power and cable companies, witness Dickerson states that in order for multiple entities to share below ground plant there must be coordination in the construction between the entities. There are also safety and space issues that can make it more difficult for multiple entities to share below ground structures.

In his deposition, witness Dickerson pointed out that while the model assumes that ten percent of the conduit is being leased by other parties, the actual sharing percentage for conduit in Sprint's networks is actually two percent.

In an interrogatory, Sprint was asked about the possibility of increasing structure sharing in the future. Sprint replied that the various entities would need to coordinate construction and evaluate the increased placement and maintenance costs of sharing buried and underground facilities, and determine the net benefit of sharing underground facilities against placing its own underground facilities.

In an interrogatory, Sprint was asked why a constant structure sharing percentage for poles was assumed in all density zones, Sprint responded that it only has the data on a statewide basis. Compared to buried and underground plant, Sprint has a small amount of aerial structures, and ". . .the data would not lend itself to be representative of all the zones."

In its brief, FDN advocates the structure sharing percentages contained in the FCC's USF Order.[8] According to FDN, Sprint's proposed structure sharing inputs are, for the most part, inconsistent with the FCC's Order. We note there is no testimony in the record to support FDN's position. The little discovery regarding this issue, referencing the FCC's USF Order, involves plant mix which appears to be more related to Section VII(f), Structure Costs.

In its USF Order,[9] the FCC recommended the following structure sharing percentages:

> We adopt the following structure sharing percentages that represent what we find is a reasonable share of structure

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[8]Tenth Report & Order, CC Docket Nos. 96-45 and 97-160, In The Matter of Federal-State Joint Board on Universal Service and Forward Looking Mechanisms for High Cost Support for Non-Rural LECs, FCC Order 99-304 (Released November 2, 1999).

[9]Ibid.

> costs to be incurred by the telephone company. For aerial structure, we assign 50 percent of structure cost in density zones 1-6 and 35 percent of the costs in density zones 7-9 to the telephone company. For underground and buried structure, we assign 100 percent of the costs in density zones 1-2, 85 percent of the cost in density zone 3, 65 percent of the cost in density zone 4-6, and 55 percent of the cost in density zones 7-9 to the telephone company.

FCC Order No. 99-304 at ¶ 243 (as quoted in FDN BR at 16).

B. DECISION

We are aware that due to the amount of coordination required between entities, large amounts of structure sharing are not possible with underground and buried plant. Thus, Sprint's proposed input of 90 percent for underground feeder and distribution plant is appropriate. This allows for 10 percent of the structure being assigned to other utilities, which is higher than what Sprint is currently experiencing in its network. For example, the current structure sharing rate for underground conduit in Sprint's network is about two percent.

For aerial plant, Sprint proposes an input of 31 percent, which means that 31 percent of the cost of the aerial plant is assigned to telephone. While this percentage is based on Sprint's actual experience in Florida, Sprint also assigns less of the aerial structure to the telephone company than would result from FDN's proposed use of the FCC's USF Order, which allocates either 35 or 50 percent of the cost of aerial structure to telephone.

FDN's proposal for structure sharing inputs is based on the FCC's <u>USF Order</u>, which states that the inputs are nationwide averages instead of company-specific data. FCC Order 99-304 at ¶30, ¶32. We find that company-specific data is more appropriate for this proceeding, since it allows for state-specific factors to be taken into consideration.

In conclusion, we find that the appropriate assumptions and inputs for structure sharing shall be 90 percent for buried and underground feeder and distribution cables, and 31 percent for poles as proposed by Sprint.

VII (f): STRUCTURE COSTS

A. ARGUMENT

In his direct testimony, Sprint witness Dickerson describes structure costs as the cost for the conduit systems, trenches, and poles that are used to support feeder and distribution plant. The two basic categories of structure cost inputs are the type of construction activity and the percent of construction done using the various types of construction activity.

Sprint witness Dickerson adds that the structure costs were based on the most current information (1999 and 2000) available in its network construction program and states that this information is the most relevant data for predicting forward-looking construction costs.

In the Sprint Loop Cost Model (SLCM) Loop Documentation section, Sprint explains that the pole costs assigned to telephone operations are based on the number of Sprint-owned poles, Sprint's carrying costs for these poles, the number of pole attachments Sprint has on poles owned by other entities, ". . .less the number and cost of other entities' attachments to Sprint poles."

In an interrogatory, Sprint was asked why its distribution and feeder plant differ so significantly from the plant mix percentages approved by the FCC in its USF Order[10], Sprint responded that the plant mix used in its cost model is based on its actual Florida data, while the FCC Order uses national default values that will vary significantly from Florida-specific data.

Regarding the FCC's inputs, Sprint points out that ". . .they are inconsistent with a) Florida Public Service Commission rules, and b) the fact that Florida experiences hurricanes." Sprint goes on to explain that the FCC's default of 30 percent aerial for distribution plant is inconsistent with the FPSC's rule requiring that all new distribution plant be placed below ground. Sprint also adds that hurricanes are detrimental to aerial plant and in hurricane prone areas, there would be additional maintenance costs associated with aerial plant.

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[10] FCC Order 99-304 at ¶¶ 236-240.

We note that Rule 25-4.088(1), Florida Administrative Code, states:

> Extensions of telephone distribution lines applied for after the effective date of these rules, and necessary to furnish permanent telephone service to all structures within a new residential subdivision, or to new multiple-occupancy buildings, shall be made underground; except that the utility may not be required to provide an underground distribution system in those instances where the applicant has elected to install an overhead electric distribution system.

Since the effective date of this rule was in 1971, it is likely that a vast majority of new construction, since 1971, has been served by underground or buried facilities.

B. DECISION

Sprint is the only party that provided any testimony on this issue. While FDN waved its position on this issue, it did send out some discovery concerning the plant mix and why Sprint was not using the FCC's USF Order. We agree with Sprint that the FCC's USF Order is based on national averages, rather than state-specific information. Since the USF inputs do not contain Florida-specific information, we do not believe that they should be used in this proceeding.

Based on the limited record on this issue, we find that the assumptions and inputs for structure costs proposed by Sprint are appropriate and find that they shall be used in conjunction with changes in all other applicable sections.

VII (g): FILL FACTORS

A. ARGUMENT

In his direct testimony, Sprint witness Dickerson describes fill factors as ". . .the percentage of available network capacity utilized." He continues his testimony by describing the three factors that contribute to utilization:

- Anticipation of future needs is that factor whereby telecommunications companies determine their future plant needs considering the fact that it is cheaper to install facilities for future demand than to install facilities as they are needed,

- Capacity Acquired in "Blocks" is the element that capacity is only available in certain sizes; therefore, unused capacity will exist, and

- Construction Time is the amount of time needed to plan and construct facilities when replacing or expanding capacity.

Witness Dickerson continues that in order to efficiently deploy cable facilities, one must look at the cost-benefit relationship of unused capacity and the cost of installation. If there is not enough capacity, the company will not be able to meet expected installation intervals. Sprint's current cable fill allows for most customers to receive a new service installation within three days. In order to achieve parity, the same level of cable fill is needed to meet the expectations of the ALECs.

Concerning the FCC First Report and Order[11] and fill factors, Sprint witness Cox provides the following quote from the First Report and Order:

> Per-unit cost shall be derived from total costs using reasonably accurate "fill factors" (estimates of the proportion of a facility that will be "filled" with network usage); that is, the per-unit costs associated with the element must be derived by dividing the total cost associated with the element by a reasonable projection of the actual total usage of the element.

In an interrogatory response, Sprint described fill and described the kinds of fill by saying that it assumes that each household will have two lines; therefore, distribution fill is set at 100 percent. Fiber cable fill is set at 75 percent.

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[11]FCC Order 96-325 at ¶ 682.

In the same interrogatory response, Sprint defines the following terms in regards to fill:

Actual fill is defined as "the total feeder pairs in service divided by total feeder pairs available in each wire center." In order to determine feeder cable size one must divide the "total pairs served by the feeder fill input factor for the applicable density zone. The result of this calculation is then mapped to the cable size that meets or exceeds the cable pairs required."

Effective fill "is a term Sprint uses to represent the pairs served divided by the total pairs available."

SLCM fill "is the input into the model that results in cable utilization that approximates the actual fill." If the actual fill was used in the model, the effective fill that would result would be lower than the actual fill. In determining SLCM fill, "the input is increased so that the resulting cable utilization approximates the actual fill."

1. Feeder Fill

Describing the fill factors used in this filing, witness Dickerson states that feeder fill factors are based on Florida wire center-specific data, and they are adjusted to allow for the fact that the model must select cable sizes that result in additional unused cable pairs.

In Loop Workpaper 11, Sprint shows its company-wide actual feeder fill to be 50.67 percent, its effective fill to be 49.99 percent, and its SLCM fill to be 59.17 percent. In his deposition, witness Dickerson states that this workpaper only showed the fill on Sprint's copper feeder plant and concedes that the feeder fills in the model are Sprint's actual fills. The witness also states that he needs fills of these levels in order to make installations in three days or less.

Witness Dickerson, by deposition, provides the following explanation of the differences between actual, effective, and SLCM fill used for copper feeder cable:

> The actual fill is drawn from our actual cable pair assignment records differentiated between 400 pair and

> above copper cables defining the feeder cable. So with that in mind, we went and looked at 400 pair and larger cables in Florida based on our actual cable pair assignment records. We identified wire centers that best fit the nine density zones in the model, and therefore, we looked -- for example, Wire Center 9 -- or excuse me, Density Zone 9. We had wire centers that were mapped to that density zone. We looked at cable pairs assignment for those wire centers and came up with our actual fill in the network for those size cables for those wire centers was 42 percent.
>
> We then turned around and through an iterative process arrived at an input of 50 percent, 50.7, and that produces an effective fill of 47.72. Now, that same work paper shows in the aggregate for the whole run, the whole state, the whole run and the average input that our average fill for feeder cables in Florida is 50.67 percent. The effective fill in the model comes out 50 percent, and the input that will produce that effective fill as an end result in the model is 59.17.

Sprint witness Dickerson states that the fiber feeder fill is set at 75 percent in the model. The reason that the fiber feeder fill is higher is due to the fact that ". . .fiber fill is determined by [the] number of individual systems that need to be served on it [fiber feeder cable] and [the] number of individual high-capacity loop circuits or interoffice circuits that need to be served off of it." He explains that the appropriate cable size for fiber feeder plant is determined by taking the requirement of pairs needed and dividing it by the .75 fill factor, and then modeling the closest cable size that meets the required demand.

The witness continues by explaining the reason for the difference in fills between copper and fiber feeder. The witness explains that in order to add additional customers to a copper feeder system you must place additional copper, while with fiber you can ". . . add terminals and create greater bandwidth on the same number of lit strands. . . ." Due to this difference between copper and fiber, one must place additional copper cable to avoid additional construction costs every time an additional copper pair is needed. Additionally, the witness points out that copper feeder would be deployed for customer locations less than 12,000 feet from the central office, while fiber feeder would be deployed for customer locations greater than 12,000 feet from the central office.

2. Distribution Fill

In his direct testimony, witness Dickerson explains that the distribution fill was set at 100 percent and the model is set for two distribution pairs per household. Two distribution pairs is the forward-looking, least-cost method to meet demand for multiple lines, and avoids inefficient construction in the future.

In his deposition, witness Dickerson explained the distribution fill and the reasons that it is modeled for two pairs per household. Where there are more pairs in service than households, you will have a fill greater than 50 percent. Their reasoning behind modeling two pairs per household is the difficulty in predicting how many households would want a second line. Also, the Sprint witness notes that 60 percent of the cost of cable construction is labor, so most of the additional cost in initially laying additional plant is the small increase in the cost of the cable. He continues by stating that people do not like it when Sprint comes through neighborhoods to place additional cable.

While distribution cable is placed at a rate of two pairs per residential unit, Sprint witness Dickerson concedes that Sprint's actual utilization factor for distribution plant to residential units is between the low thirties and high forties.

3. Transport Fill

Per the transport cost model, the utilization factors of the transport rings range from about 15 percent to about 95 percent. Based on the testimony of witness Cox concerning the cut-over of transport plant, these utilization factors appear to be reasonable. Concerning whether or not Sprint will have theoretically high fill factors, witness Cox responds that "[w]ith certain sections of Sprint-Florida being rural it does not have sufficient traffic to maintain a high utilization factor. This is in large part due to the nature of transmission capacity." He continues by providing an example of migrating from an OC-3 system to an OC-12 system, where at cutover, one would have a utilization rate of less than 25 percent.

4. Theoretical Utilization Factors

In various interrogatory responses, Sprint indicates that the lead time for adding capacity ranges from 6 months for transport electronics and switching to 12 months for cable and digital loop carriers. Depending on the type of equipment and growth rate, capacity is expanded when the current network reached 80 to 90 percent capacity.

5. FDN's Position

FDN advocates in its brief (and KMC concurs) use of a fill rate of 85 percent or higher for Sprint. FDN did not provide any testimony concerning this issue, but in its brief quoted the Florida USF Order [12] in which this Commission ordered that 1.5 pairs per residential unit be assumed. (FDN brief quoting Order No. PSC-99-0068-FOF-TP). FDN also believes that "Sprint is not basing its fill factors on a 'reasonable projection' of the usage of the element in the future 'most efficient' network, but instead is basing it on the actual current usage of its embedded network."

In the BellSouth Telecommunications, Inc. (BellSouth) track of this docket (Docket No. 990649A-TP), it was determined that BellSouth's feeder cable inputs resulting in an effective fill of approximately 74 percent were reasonable. This Commission also found that BellSouth's distribution fill factors, resulting in utilizations of 47 percent, to be reasonable. See Order No. PSC-01-1181-FOF-TP at p. 202.

Concerning distribution cable, this Commission agreed with BellSouth's proposal of "2 pairs per household" for residential customers and using the "actual number of lines" for businesses. Order No. PSC-01-1181-FOF-TP at p. 202.

When asked to explain the difference in BellSouth's approved feeder fill of 74 percent and Sprint's which is around 50 percent, Sprint witness Dickerson replies that he believes that the trend is for rural areas to have lower fill than urban areas due to slower

[12] Order No. PSC-99-0068-FOF-TP, issued January 7, 1999, in Docket No. 980696-TP, In re: Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes, (UFS Order).

growth. He also said that BellSouth's customers are in more urban areas than Sprint's and would therefore probably have more growth. He continued by saying that he did not think that Sprint could manage its network, for both ALEC and retail customers, with a three day turn around, with a fill of 74 percent over the life of the cable.

6. Comparison to Verizon's Recommendation

During the October 14, 2002, Special Agenda Conference, concerns were expressed whether our staff's recommended fill factors for Verizon were consistent with those recommended for Sprint. The primary concern was over the difference in distribution fills between these two companies.

Verizon's cost model does not use fill factors per se, but uses cable sizing factors. Feeder cable is designed to be reinforced, so it lays the feeder cable required at the mid-point of a four-year planning horizon. It utilizes an engineering factor of 1.011 to determine what size cables are needed. Order No. PSC-02-1574-FOF-TP, issued November 15, 2002, at p. 93. The model then places plant to meet the demand for the cable sizes needed, based on the sizes that are available. Order No. PSC-02-1574-FOF-TP at p. 105. As an example, if the model determined that an 86 pair cable was needed on a given feeder route, the model would multiply 86 by the engineering factor of 1.011 to determine that 86.9 cable pairs were needed. It would then place a 100 pair cable on that route since that is the next size cable that would be available. The effective fill on that fiber route would be 86 percent.

In sizing its distribution cable, Verizon uses an approach similar to what it uses to size feeder cable. The primary difference is that distribution plant is built to meet ultimate demand. In order to meet ultimate demand, the model places 2.16 lines per lot. Order No. PSC-02-1574-FOF-TP at p. 97. The 2.16 lines per lot is a weighted average of the lines per lot placed in each of the density zones, adjusted for the removal of secondary lines.

In addition, Verizon's ICM Model uses an administrative fill input. Verizon originally proposed an administrative fill input of .98, which means if the cable size that would meet the needs of a route is more than 98 percent utilized, the model would place the next largest cable size. Order No. PSC-02-1574-FOF-TP at 103. We found that there is adequate room for growth in the cable sizing factors; therefore, the administrative fill input was set at 1.0. Order No. PSC-02-1574-FOF-TP at p. 106.

Like Verizon, Sprint also uses cable sizing factors. For copper feeder cable, the SLCM fill rate is utilized which provides the model an effective fill that replicates what is actually in Sprint's network. For fiber feeder, cable size is determined by taking the requirement of pairs needed and dividing it by the .75 fill factor, and then modeling the closest cable size that meets the required demand.

Sprint also models distribution cable for ultimate demand or 100 percent fill. The model does this by placing 2 cable pairs per household, and then modeling the appropriate cable size to meet this demand.

We note that while Sprint's proposed method of sizing cables is different than what we approved for Verizon, Sprint's approach is similar to that proposed and subsequently approved by this Commission for BellSouth. BellSouth models feeder cable by using a ". . . cable sizing factor and standard size cables to determine the required cables to be placed." The BellSouth model provided an effective feeder cable fill of 74 percent. See Order No. PSC-01-1181-FOF-TP at p. 195. The cable sizing factor for a particular route is based on:

> . . . [T]he density zone the route falls within, a table lookup is made to obtain the sizing factor. The working pairs on a route are then divided by the factor to arrive at the pair requirements. The model then picks the next largest cable of sufficient size to serve that route.
>
> . . .the model divides working pairs by the available pairs to determine the effective fill.

Order No. PSC-01-1181-FOF-TP at p. 197.

As an example, if you take an 86 pair cable and divide it by a fill factor of .825, the BellSouth model will show a need for a 104.24 or 105 pair cable. The model will then place a 200 pair cable to meet this need for a 105 pair cable.

B. DECISION

We agree with Sprint that when considering the placing of plant and the resulting fill, one must assess the cost/benefit relationship. We also agree that a company must consider future needs, the availability of capacity only in certain sizes, and the lead time for adding new facilities when it determines how to lay plant.

We also concur with the distribution fill being set at 100 percent, with two lines per household. This is more effective than adding an additional line when a household requests a second line.

FDN's position is that presumably all fill factors should be at least 85 percent. While FDN did argue this position in its brief, there is nothing in the record to support this position, other than that Sprint considers adding capacity to its network when 85 percent actual fill is attained. For its argument for 1.5 pairs per household for distribution plant, FDN relies on the USF Commission's Order. We point out that this order was issued on January 7, 1999, and the purpose for that proceeding was to develop the forward-looking economic cost of basic service in Florida, which is defined as flat rate residential and single-line flat rate business. Order No. PSC-99-0068-FOF-TP at p. 143. We also note that this Commission approved the modeling of 2 pairs per household for BellSouth and a weighted average of 2.16 pairs per household for Verizon.

For feeder cable, FDN argues that Sprint's fiber fill factor of 75 percent is based on Sprint's embedded network, for which Sprint does not provide any justification. FDN also argues that while offering additional services that will increase its utilization rate for fiber, "Sprint cannot legitimately contend that its current fiber utilization rate will remain constant in the forward-looking network." Finally, FDN points out, without citing specific record evidence, that there is double counting of the costs of spare fiber in the loop and transport cost studies and in the dark fiber study. As an alternative, FDN proposes a fiber cable utilization rate on a forward-looking basis of at least 90 percent, but does not provide any justification for its proposed utilization factor.

Due to these considerations and the fact that Sprint serves an area that is more rural than BellSouth, we find that BellSouth's ordered feeder fill of 74 percent should serve as the maximum rate for Sprint's fill factors. Understanding that Sprint's customers are more rural, coupled with the lack of record evidence proposing another fill rate, we find that Sprint's feeder fill in the model shall be set at its SLCM fill of 59.17 percent.

Therefore, we find that the appropriate assumptions and inputs for fill factors in the forward-looking UNE cost studies shall be the fills filed by Sprint.

VII (h): MANHOLES

A. ARGUMENT

In explaining the development of Sprint's cost model inputs manholes/handholes, Sprint witness Dickerson states that for manholes, material and labor costs and sharing inputs were set conservatively. Sprint's sharing percentages were set at levels higher than Sprint's actual experience, allowing for future increases in structure sharing. For conduit, due to the fact that the model does not place excess conduit that could be shared with other parties, the sharing input is set at 100 percent.

Sprint's Cost Model's Loop Documentation provides the following information about manholes:

- The costs are based on the cost of opening and closing the ground necessary to place the manhole systems.
- Due to increased sharing opportunities as customer density increases, the structure sharing percentages vary by density zones.
- Costs and frequency of use is based on actual placement activities by Sprint and its contractor.
- Manholes are sized based on the required number of ducts.

B. DECISION

Sprint is the only party that either provided testimony or took a position on this issue. Based on the limited record in this issue, we find that the assumptions and inputs for manholes proposed by Sprint are appropriate and find that they shall be used in conjunction with the changes in all other applicable sections.

VII (i) and (j): FIBER CABLE AND COOPER CABLE (MATERIAL AND PLACEMENT COSTS)

This section addresses the appropriate assumptions and inputs to be used in Sprint's forward-looking UNE cost studies for fiber and copper material and placement costs. These issues are very similar; therefore, they are being addressed together.

A. ARGUMENT

Fiber and copper cable are utilized as underground, buried, and aerial. The Sprint Loop Cost Model (SLCM) inputs include the costs for material, exempt and other material, tax, placement, splicing, and engineering.

Sprint's witness Dickerson explains that the SLCM inputs for fiber and copper cable costs are developed using Sprint's current vendor cost for purchasing cable and adding Florida-specific sales tax. Cable costs are developed on a per foot basis and are a function of material and labor. Witness Dickerson explains that cable cost inputs are based on an analysis of Sprint's cable installations in Florida for 1998-2000 from the Project Administration and Costing System (PACS). The costs include exempt and other material, such as splice enclosures and cable mounting hardware, overhead and cable placement, splicing and engineering costs. The overhead amount accounts for indirect support costs associated with activities that are not directly related to engineering or construction but are necessary components of outside plant construction.

1. Material Costs

One major determinant in the cost of unbundled loops is material costs, as they are the basic components that make up the network. Sprint uses current vendor material costs for cable, thus reflecting economies of scale. The SLCM methodology explains:

> Sprint's company specific inputs reflect the realities of providing local service in its operating territory. Sprint's recent experience with actual purchase, installation, and ongoing maintenance of telephone plant

> equipment provides the best information for predicting the forward-looking UNE costs within Sprint's service territory. The material inputs are based upon current vendor prices for material and equipment plus Sprint-specific labor costs for engineering, plant supervision, and installation. State specific sales tax is also included in the material calculations.

According to the model documentation, per foot costs are developed for standard copper and fiber cables. Additionally, Sprint's copper cable material costs reflect use of 24- and 26-gauge cables. The SLCM documentation explains that 24-gauge aerial and buried copper cables of 3000 pairs and above are not standard production sizes, so 26-gauge cable is used. For underground cable, Sprint uses 26- gauge cable for 2100 pairs and above. The standard sizes of fiber cables range from 12 to 288 fibers.

Sprint applies six factors to its material costs for an engineered, furnished, and installed (EF&I) cost. These include costs for exempt material amount, tax, placement, splicing, engineering, and overheads. A discussion of loading factors is found in Section VII(s). The SLCM documentation explains that the placement additive is restrictive to the placement of aerial cable onto the support strand, the rodding of the ducts, and the pulling of underground cable into the duct. Buried cable placement is included with the structure costs.

2. Placement Costs

In addition to material costs, Sprint notes that major determinants of the cost for unbundled loops include customer density, distance from the central office, terrain, weather, and local market conditions. These factors are included in cable placement costs.

Placement costs account for the placing of the cable on a pole line, in a trench, or in a conduit. The costs are developed on a per foot basis and are based on the relationship of total expenditures in PACS related to placing the given type of cable divided by the total number of feet of that cable placed.

Customer Density

According to the SLCM documentation, customer density is the single largest factor impacting the cost of local loops. The density of customers impacts loop costs in an inverse manner; that is, the higher the customer density, the lower the cost of the local loop. Customer density ultimately determines the number of customers or loops there are over which to spread the cost of digging a trench, or placing conduit or placing poles.

Structure Inputs

Structure type, or cable type, also has a major impact on the cost of loops. Witness Dickerson explains that structure costs include the type of construction activity associated with the given cable (e.g., trench and backfill, cut and restore sod, plow and bore cable). Florida-specific structure cost inputs are developed based on Sprint's analysis of the entire 1999 and 2000 contractor construction costs and activities as tracked in the Network Construction Activity Program (NETCAP). Witness Dickerson asserts that this ". . . provides the most current, verifiable and pertinent data available for predicting the forward-looking costs of construction in the same markets from which the data was drawn." Buried cable placement is accounted for in the buried structure inputs in SLCM.

Additionally, Sprint's structure inputs vary by density zone to recognize the difference in work activities incurred between rural and urban areas. "For example, more sidewalks and streets must be dealt with in an urban area compared to a rural area. The more obstacles encountered when installing cable, the greater the cost." The assumptions and inputs for structure costs are discussed in more detail in Section VII(f).

Distance

Distance is another factor impacting loop costs. Sprint asserts that loop costs increase directly as the distance from the central office increases. The model documentation explains:

> This relationship results from the obvious need to place more cable, trenches, conduit and or aerial pole lines as the distance or length of the loop increases.

Terrain

The model documentation explains that the type of terrain in which cable is placed impacts both the cost of the initial cable placement and the maintenance of the cable. The cost of buried and underground (below-ground) cable construction increases as the presence and hardness of rock increases. Moreover, factors such as the water table and trees affect both the initial construction cost of loops and subsequent maintenance expense.

Weather

Weather affects the maintenance costs and therefore is significant in deciding the type of cable being placed (buried, aerial, or underground).

Local Market Conditions

The loop model documentation notes that local zoning laws requiring the placement of buried or underground plant, screening and landscaping around Serving Area Interface (SAI) and Digital Loop Carrier (DLC) sites, construction permits and restrictions, heavy presence of concrete and asphalt, traffic flows, and local labor costs, all impact the construction and maintenance costs of loop plant and vary between locations.

A summary of Sprint's material and placement cost inputs for each size and type of copper and fiber cable is shown below in Tables 7(i)-1 through 7(i)-9. The "Total Cost" dollar amount is the total material cost input, inclusive of additive loadings.

TABLE 7(i)-1: Underground Fiber Cable					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0022)	($)
288	10.16	5.37	0.38	0.64	3.77
144	7.03	2.74	0.19	0.32	3.77
96	5.97	1.86	0.13	0.21	3.77
72	5.44	1.41	0.10	0.16	3.77
60	5.20	1.21	0.08	0.13	3.77
48	4.90	0.95	0.07	0.11	3.77
36	4.68	0.78	0.05	0.08	3.77
24	4.45	0.58	0.04	0.05	3.77
18	4.29	0.45	0.03	0.04	3.77
12	4.21	0.38	0.03	0.03	3.77

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 7.

TABLE 7(i)-2: Buried Fiber Cable					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0058)	($)
288	11.33	5.70	0.40	1.68	3.55
144	7.57	2.97	0.21	0.84	3.55
96	6.30	2.04	0.14	0.56	3.55
72	5.64	1.56	0.11	0.42	3.55
60	5.35	1.36	0.09	0.35	3.55
48	5.00	1.09	0.08	0.28	3.55
36	4.72	0.89	0.06	0.21	3.55
24	4.42	0.69	0.05	0.14	3.55
18	4.25	0.56	0.04	0.10	3.55
12	4.13	0.48	0.03	0.07	3.55

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 7.

TABLE 7(i)-3: Aerial Fiber Cable					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0044)	($)
288	8.82	5.37	0.38	1.26	1.81
144	5.38	2.74	0.19	0.63	1.81
96	4.22	1.86	0.13	0.42	1.81
72	3.63	1.41	0.10	0.32	1.81
60	3.38	1.21	0.08	0.26	1.81
48	3.04	0.95	0.07	0.21	1.81
36	2.80	0.78	0.05	0.16	1.81
24	2.54	0.58	0.04	0.11	1.81
18	2.38	0.45	0.03	0.08	1.81
12	2.28	0.38	0.03	0.05	1.81

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 7.

TABLE 7(i)-4: Underground Copper - 26 Gauge					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0047)	($)
4200	54.37	20.61	1.44	19.59	12.72
3600	48.43	17.68	1.24	16.79	12.72
3000	42.50	14.75	1.03	13.99	12.72
2400	37.51	12.71	0.89	11.19	12.72
2100	34.31	11.02	0.77	9.80	12.72
1800	31.89	10.07	0.70	8.40	12.72
1200	24.52	5.79	0.41	5.60	12.72
900	21.73	4.50	0.31	4.20	12.72
600	18.97	3.22	0.23	2.80	12.72
400	17.09	2.34	0.16	1.87	12.72
300	15.80	1.57	0.11	1.40	12.72
200	14.81	1.08	0.08	0.93	12.72

TABLE 7(i)-4: Underground Copper - 26 Gauge					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0047)	($)
100	13.93	0.69	0.05	0.47	12.72
50	13.42	0.44	0.03	0.23	12.72
B25	13.08	0.23	0.02	0.12	12.72
18	13.01	0.19	0.01	0.08	12.72
12	12.95	0.16	0.01	0.06	12.72

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 5.

TABLE 7(i)-5: Buried Copper - 26 Gauge					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0028)	($)
4200	36.51	20.61	1.44	11.96	2.49
3600	31.66	17.68	1.24	10.25	2.49
3000	26.82	14.75	1.03	8.54	2.49
2400	22.93	12.71	0.89	6.83	2.49
2100	20.27	11.02	0.77	5.98	2.49
1800	18.39	10.07	0.70	5.12	2.49
1200	12.11	5.79	0.41	3.42	2.49
900	9.87	4.50	0.31	2.56	2.49
600	7.65	3.22	0.23	1.71	2.49
400	6.14	2.34	0.16	1.14	2.49
300	5.03	1.57	0.11	0.85	2.49
200	4.22	1.08	0.08	0.57	2.49
100	3.52	0.69	0.05	0.28	2.49
50	3.11	0.44	0.03	0.14	2.49
25	2.81	0.23	0.02	0.07	2.49
18	2.75	0.19	0.01	0.05	2.49
12	2.70	0.16	0.01	0.03	2.49

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 6.

TABLE 7(i)-6: Aerial Copper - 26 Gauge

Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0056)	($)
4200	48.76	20.61	1.44	23.50	3.20
3600	42.26	17.68	1.24	20.14	3.20
3000	35.77	14.75	1.03	16.79	3.20
2400	30.23	12.71	0.89	13.43	3.20
2100	26.75	11.02	0.77	11.75	3.20
1800	24.05	10.07	0.70	10.07	3.20
1200	16.11	5.79	0.41	6.71	3.20
900	13.05	4.50	0.31	5.04	3.20
600	10.00	3.22	0.23	3.36	3.20
400	7.94	2.34	0.16	2.24	3.20
300	6.56	1.57	0.11	1.68	3.20
200	5.48	1.08	0.08	1.12	3.20
100	4.50	0.69	0.05	0.56	3.20
50	3.95	0.44	0.03	0.28	3.20
25	3.58	0.23	0.02	0.14	3.20
18	3.51	0.19	0.01	0.10	3.20
12	3.44	0.16	0.01	0.07	3.20

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3-4.

TABLE 7(i)-7: Underground Copper - 24 Gauge					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0047)	($)
4200	54.37	20.61	1.44	19.59	12.72
3600	48.43	17.68	1.24	16.79	12.72
3000	42.50	14.75	1.03	13.99	12.72
2400	42.79	17.64	1.23	11.19	12.72
2100	39.26	15.65	1.10	9.80	12.72
1800	35.58	13.52	0.95	8.40	12.72
1200	27.55	8.63	0.60	5.60	12.72
900	23.89	6.51	0.46	4.20	12.72
600	20.15	4.33	0.30	2.80	12.72
400	17.90	3.10	0.22	1.87	12.72
300	16.60	2.32	0.16	1.40	12.72
200	15.31	1.54	0.11	0.93	12.72
100	14.08	0.83	0.06	0.47	12.72
50	13.46	0.47	0.03	0.23	12.72
25	13.15	0.29	0.02	0.12	12.72
18	13.02	0.20	0.01	0.08	12.72
12	12.98	0.19	0.01	0.06	12.72

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 5.

TABLE 7(i)-8: Buried Copper - 24 Gauge					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0028)	($)
4200	36.51	20.61	1.44	11.96	2.49
3600	31.66	17.68	1.24	10.25	2.49
3000	26.82	14.75	1.03	8.54	2.49
2400	28.20	17.64	1.23	6.83	2.49
2100	25.22	15.65	1.10	5.98	2.49
1800	22.08	13.52	0.95	5.12	2.49
1200	15.15	8.63	0.60	3.42	2.49
900	12.03	6.51	0.46	2.56	2.49
600	8.83	4.33	0.30	1.71	2.49
400	6.95	3.10	0.22	1.14	2.49
300	5.83	2.32	0.16	0.85	2.49
200	4.72	1.54	0.11	0.57	2.49
100	3.67	0.83	0.06	0.28	2.49
50	3.14	0.47	0.03	0.14	2.49
25	2.87	0.29	0.02	0.07	2.49
18	2.76	0.20	0.01	0.05	2.49
12	2.73	0.19	0.01	0.03	2.49

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3, 6.

TABLE 7(i)-9: Aerial Copper - 24 Gauge					
Size	Total Cost	Material Cost	Tax	Splicing Costs	Eng., Plcg., EM, OH Costs
	($)	($)	(7.0%)	(.0056)	($)
4200	48.76	20.61	1.44	23.50	3.20
3600	42.26	17.68	1.24	20.14	3.20
3000	35.77	14.75	1.03	16.79	3.20
2400	35.50	17.64	1.23	13.43	3.20
2100	31.69	15.65	1.10	11.75	3.20
1800	27.74	13.52	0.95	10.07	3.20
1200	19.15	8.63	0.60	6.71	3.20
900	15.21	6.51	0.46	5.04	3.20
600	11.19	4.33	0.30	3.36	3.20
400	8.75	3.10	0.22	2.24	3.20
300	7.36	2.32	0.16	1.68	3.20
200	5.97	1.54	0.11	1.12	3.20
100	4.65	0.83	0.06	0.56	3.20
50	3.99	0.47	0.03	0.28	3.20
25	3.65	0.29	0.02	0.14	3.20
18	3.51	0.20	0.01	0.10	3.20
12	3.47	0.19	0.01	0.07	3.20

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 3-4.

3. FDN and KMC

In its post-hearing brief, FDN argues that Sprint's dark fiber fill factors are inappropriate and lead to double recovery of Sprint's costs. If this is not corrected, FDN recommends that Sprint's material and placement costs for fiber loop and interoffice fiber be reduced to reflect the fact that some capacity costs are being recovered in the dark fiber rates. KMC concurs with FDN on this position.

As support for its position, FDN asserts that witness Dickerson testifies that the available dark fiber in Sprint's network is the same fiber that is included as spare in Sprint's loop and interoffice facility cost calculation. Further, FDN notes that witness Dickerson states that Sprint does not consider dark fiber demand in its loop and interoffice facility calculations for cost recovery purposes. FDN concludes that Sprint has already attributed the capacity cost of those facilities, and the associated structure and placement costs, to the cost of loops and interoffice facilities. This results in a double-recovery of the same capacity costs in other UNEs, under the notion of a fill factor. FDN argues that the capacity cost of "spare" fiber should not be included in the loop and transport studies and then again in the dark fiber cost study. FDN alleges that Sprint has inadequate justification for its dark fiber utilization factor.

4. Sprint's Response

Sprint contends that FDN's allegations are unsupported by any record evidence. Sprint asserts that the fill factor for fiber represents lit fiber cables and not dark fiber. Sprint opines there is no double recovery.

Sprint argues that its cost studies reflect the Florida plant mix. Sprint asserts that new distribution cables are placed below ground in accordance with Rule 25-4.008, Florida Administrative Code. Notwithstanding this, storms and hurricanes make it more efficient to place buried and underground plant. For this reason, Sprint's plant mix reflects a large amount of buried and underground plant. Sprint concludes that "FDN offers no evidence that Sprint-Florida's forward-looking plant mix should be more aerial than buried or underground, nor does FDN offer evidence that aerial plant is the least cost most efficient type of plant for Sprint-Florida's service territory."

B. DECISION

We are troubled that no party other than Sprint filed testimony regarding copper and fiber cable material and placement cost inputs. We note that FDN disagrees with Sprint's fill factors for dark fiber, feeder plant mix, and the assumption of two distribution pairs per residence. KMC concurs with FDN's disagreement.

FDN's dispute with Sprint's assumed number of distribution pairs is addressed in Section VII (g) and, therefore, will not be addressed here. Our discussions of dark fiber loop and interoffice facilities are in Section VII(s).

FDN argues that the material and placement costs of dark fiber are included in Sprint's inputs for loop and interoffice facility calculations; however, the demand is not. FDN alleges that Sprint already attributes the capacity cost of dark fiber loop facilities, and the structure and placement cost for those facilities, to the cost of loops and interoffice facilities. FDN therefore concludes that Sprint's proposed charges for dark fiber will result in a double recovery of the same capacity costs as included in studies for other UNEs. FDN argues that if Sprint's fill factor for dark fiber is not adjusted to 100 percent, there should be no capacity cost for dark fiber. If the fill factors for dark fiber are not adjusted, Sprint's material and placement costs for fiber loop and interoffice facilities should be reduced to reflect that some capacity costs are being recovered in the dark fiber rates.

We find that FDN's arguments relate specifically to fill factors and are addressed in other issues. We note that adjusting fill factors will effect fiber loop and interoffice facility costs. However, fill factors do not effect the material and placement cost inputs of cables. Moreover, FDN does not offer a specific adjustment to the material and placement costs, but merely asserts one should be made. We disagree with FDN's arguments that cable material and placement cost inputs should be reduced.

Even though the testimony presented is limited to that of Sprint, it is nevertheless incumbent upon us to determine the reasonableness of Sprint's inputs. We find that the Universal Service Order and BellSouth Phase II Order[13], offer some guidance in analyzing Sprint's cable cost inputs. We do not believe the inputs adopted in either referenced order are appropriate to use in this instant proceeding but should only serve as a reference source in our analysis. The Universal Service proceeding related to a legislative mandate and the inputs are several years old. Regardless, the adopted inputs were Sprint-specific and can serve

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[13]Order No. PSC-99-0068-FOF-TP, issued January 7, 1999, in Docket No. 980696-TP (Universal Service Order) (regarding the determination of the cost of basic local telecommunications service); and Order No. PSC-01-1181-FOF-TP, issued May 25, 2001, in Docket No. 990649A-TP, (BellSouth Phase II Order).

as a check for reasonableness of Sprint's proposed inputs in the instant docket. Tables 7(i)-10 through 7(i)-18 compare Sprint's material cost inputs and total EF&I costs with those approved by the Universal Service Order.

TABLE 7(i)-10: Underground Fiber Cable

	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
288	$10.16	$5.37	$15.01	$7.01
144	$7.03	$2.74	$9.41	$3.78
96	$5.97	$1.86	$7.51	$2.63
72	$5.44	$1.41	$6.55	$1.95
60	$5.20	$1.21	$6.07	$1.66
48	$4.90	$0.95	$5.51	$1.39
36	$4.68	$0.78	$4.91	$1.02
24	$4.45	$0.58	$4.58	$0.83
18	$4.29	$0.45	$4.43	$0.75
12	$4.21	$0.38	$4.23	$0.63

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 7; Order No. PSC-99-0068-FOF-TP, pp. 154, 162.

TABLE 7(i)-11: Buried Fiber Cable				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
288	$11.33	$5.70	$14.26	$7.01
144	$7.57	$2.97	$8.28	$3.78
96	$6.30	$2.04	$6.23	$2.63
72	$5.64	$1.56	$5.16	NA
60	$5.35	$1.36	$4.64	$1.66
48	$5.00	$1.09	$4.07	$1.39
36	$4.72	$0.89	$3.42	$1.02
24	$4.42	$0.69	$3.06	$0.83
18	$4.25	$0.56	$2.90	$0.75
12	$4.13	$0.48	$2.68	$0.63

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 7; Order No. PSC-99-0068-FOF-TP, pp. 155, 163.

TABLE 7(i)-12: Aerial Fiber Cable				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
288	$8.82	$2.37	$13.90	$7.68
144	$5.38	$2.74	$7.82	$3.78
96	$4.22	$1.86	$5.96	$2.57
72	$3.63	$1.41	$5.33	$2.12
60	$3.38	$1.21	$4.68	$1.66
48	$3.04	$0.95	$4.15	$1.39
36	$2.80	$0.78	$3.70	$1.12
24	$2.54	$0.58	$3.22	$0.79
18	$2.38	$0.45	$3.03	$0.67
12	$2.28	$0.38	$2.83	$0.54

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 7; Order No. PSC-99-0068-FOF-TP, pp. 155, 164.

TABLE 7(i)-13: Underground Copper - 26 Gauge

	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
4200	$54.37	$20.61	$61.69	$33.99
3600	$48.43	$17.68	$50.61	$27.28
3000	$42.50	$14.75	$43.65	$23.59
2400	$37.51	$12.71	$26.53	$12.52
2100	$34.31	$11.02	$23.32	$10.84
1800	$31.89	$10.07	$20.05	$9.15
1200	$24.52	$5.79	$11.71	$4.46
900	$21.73	$4.50	$10.51	$4.27
600	$18.97	$3.22	$7.70	$2.88
400	$17.09	$2.34	$7.69	$1.95
300	$15.80	$1.57	$6.48	$1.64
200	$14.81	$1.08	$5.06	$1.20
100	$13.93	$0.69	$3.82	$0.54
50	$13.42	$0.44	$3.40	$0.32
25	$13.08	$0.23	$3.18	$0.19
18	$13.01	$0.19	$2.78	$0.23
12	$12.95	$0.16	$2.51	$0.15

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 5; Order No. PSC-99-0068-FOF-TP, pp. 159, 168.

TABLE 7(i)-14: Buried Copper - 26 Gauge				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
4200	$36.51	$20.61	$53.39	$33.99
3600	$31.66	$17.68	$43.21	$27.28
3000	$26.82	$14.75	$37.45	$23.59
2400	$22.93	$12.71	$20.86	$12.52
2100	$20.27	$11.02	$18.53	$10.84
1800	$18.39	$10.07	$15.83	$9.15
1200	$12.11	$5.79	$8.80	$4.46
900	$9.87	$4.50	$8.24	$4.27
600	$7.65	$3.22	$6.21	$2.88
400	$6.14	$2.34	$5.42	$1.95
300	$5.03	$1.57	$4.61	$1.64
200	$4.22	$1.08	$4.07	$1.20
100	$3.52	$0.69	$2.85	$0.54
50	$3.11	$0.44	$2.44	$0.32
25	$2.81	$0.23	$2.22	$0.19
18	$2.75	$0.19	$1.94	$0.23
12	$2.70	$0.16	$1.70	$0.15

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 6; Order No. PSC-99-0068-FOF-TP, pp. 160, 169.

TABLE 7(i)-15: Aerial Copper - 26 Gauge				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
4200	$48.76	$20.61	$45.14	$33.99
3600	$42.26	$17.68	$36.81	$27.28
3000	$35.77	$14.75	$32.03	$23.59
2400	$30.23	$12.71	$18.54	$12.52
2100	$26.75	$11.02	$16.72	$10.84
1800	$24.05	$10.07	$14.47	$9.15
1200	$16.11	$5.79	$8.75	$4.46
900	$13.05	$4.50	$8.18	$4.27
600	$10.00	$3.22	$6.55	$2.88
400	$7.94	$2.34	$5.07	$1.95
300	$6.56	$1.57	$4.27	$1.64
200	$5.48	$1.08	$3.87	$1.20
100	$4.50	$0.69	$2.79	$0.54
50	$3.95	$0.44	$2.42	$0.32
25	$3.58	$0.23	$2.23	$0.19
18	$3.51	$0.19	$1.86	$0.23
12	$3.44	$0.16	$1.62	$0.15

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 4; Order No. PSC-99-0068-FOF-TP, pp. 161, 170.

TABLE 7(i)-16: Underground Copper - 24 Gauge				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
4200	$54.37	$20.61	$61.69	$33.99
3600	$48.43	$17.68	$50.61	$27.28
3000	$42.50	$14.75	$43.65	$23.59
2400	$42.79	$17.64	$31.51	$16.14
2100	$39.26	$15.65	$27.68	$14.01
1800	$35.58	$13.52	$23.80	$11.87
1200	$27.55	$8.63	$14.21	$6.27
900	$23.89	$6.51	$12.39	$5.63
600	$20.15	$4.33	$8.95	$3.79
400	$17.90	$3.10	$8.51	$2.55
300	$16.60	$2.32	$7.10	$2.09
200	$15.31	$1.54	$5.47	$1.50
100	$14.08	$0.83	$4.03	$0.69
50	$13.46	$0.47	$3.51	$0.40
25	$13.15	$0.29	$3.23	$0.23
18	$13.02	$0.20	$2.83	$0.26
12	$12.98	$0.19	$2.54	$0.17

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 5; Order No. PSC-99-0068-FOF-TP, pp. 156, 164-165.

TABLE 7(i)-17: Buried Copper - 24 Gauge				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
4200	$36.51	$20.61	$53.39	$33.99
3600	$31.66	$17.68	$43.21	$27.28
3000	$26.82	$14.75	$37.45	$23.59
2400	$28.20	$17.64	$26.18	$16.14
2100	$25.22	$15.65	$23.18	$14.01
1800	$22.08	$13.52	$19.83	$11.87
1200	$15.15	$8.63	$11.46	$6.27
900	$12.03	$6.51	$10.24	$5.63
600	$8.83	$4.33	$7.55	$3.79
400	$6.95	$3.10	$6.30	$2.55
300	$5.83	$2.32	$5.27	$2.09
200	$4.72	$1.54	$4.51	$1.50
100	$3.67	$0.83	$3.07	$0.69
50	$3.14	$0.47	$2.55	$0.40
25	$2.87	$0.29	$2.27	$0.23
18	$2.76	$0.20	$1.98	$0.26
12	$2.73	$0.19	$1.73	$0.17

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 6; Order No. PSC-99-0068-FOF-TP, pp. 157, 166.

TABLE 7(i)-18: Aerial Copper - 24 Gauge				
	Sprint		Universal Service Order	
Size	Total Cost	Material Cost	Total Cost	Material Cost
4200	$48.76	$20.61	$45.14	$33.99
3600	$42.26	$17.68	$36.81	$27.28
3000	$35.77	$14.75	$32.03	$23.59
2400	$35.50	$17.64	$22.82	$16.14
2100	$31.69	$15.65	$20.47	$14.01
1800	$27.74	$13.52	$17.68	$11.87
1200	$19.15	$8.63	$10.89	$6.27
900	$15.21	$6.51	$9.79	$5.63
600	$11.19	$4.33	$7.63	$3.79
400	$8.75	$3.10	$5.78	$2.55
300	$7.36	$2.32	$4.80	$2.09
200	$5.97	$1.54	$4.23	$1.50
100	$4.65	$0.83	$2.97	$0.69
50	$3.99	$0.47	$2.51	$0.40
25	$3.65	$0.29	$2.28	$0.23
18	$3.51	$0.20	$1.90	$0.26
12	$3.47	$0.19	$1.64	$0.17

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, p. 4; Order No. PSC-99-0068-FOF-TP, pp. 158, 167.

Sprint witness Dickerson explains that the SLCM fiber and copper cable material cost inputs are developed on a cost per foot basis using Sprint's current vendor costs. As shown above, Sprint's fiber material costs are generally lower for each size and type of cable than those adopted by Order No. PSC-99-0068-FOF-TP. For copper cables, Sprint's proposed material costs are generally lower for the larger sized cables, 3000-pair and above, and range from 1.5 percent to 6 percent higher for cable sizes below 3000-pair. The highest increase is noted for the smallest cable sizes.

We note that Sprint's proposed copper cable material inputs do not vary by cable type. In other words, the per foot cost for each size of aerial, buried, and underground 26-gauge copper cable is the same. Similarly, the per foot cost for each size of aerial, buried, and underground 24-gauge copper cable is the same. For fiber cables, the material cost per foot for each size of aerial and underground fiber cable is the same; buried fiber material cost per foot ranges from 6 percent to 21 percent higher than the similar size of aerial and underground fiber cable, with the smallest increase found on the larger sized cables.

When comparing Sprint's material costs with those approved for BellSouth in its Phase II proceeding, we find it interesting that Sprint's material costs are lower than BellSouth's for fiber cables less than 96 fibers. See Order No. PSC-01-1181-FOF-TP at pp. 211-214. For copper cables, BellSouth's costs are generally lower than Sprint's. See Order NO. PSC-01-1181-FOF-TP at pp. 214-220. Intuitively, we believe that BellSouth can be expected to enjoy greater economies when purchasing cable. This would account for the fact that BellSouth's copper cable material costs are lower than Sprint's, but appears to be contradictory with regard to fiber cable material costs.

Sprint's total EF&I costs for aerial and underground fiber cable are generally lower than those adopted by the Universal Service Order. Buried fiber cables reflect a slight increase in larger cables to over 54 percent increase in the smallest sized cables. On the other hand, total EF&I costs for copper cables indicate a more substantial increase over those adopted in the Universal Service Order. Again, the increase is found with the smallest sized cables. The greatest increases in total EF&I costs appear in underground copper cables. For example, Sprint's EF&I costs for a 50-pair underground copper cable is almost 300 percent more than the similar cost adopted in the Universal Service Order.

Sprint explains that larger sized cables are found in urban areas; smaller sized cables are found in more rural areas. We think it is then logical that the total EF&I costs will be greater in smaller sized cables.

On the other hand, Sprint's per foot material cost ranges from about 1.5 percent for a 12-pair cable to about 38 percent for a 4200-pair cable of the total EF&I costs. Splicing accounts for less than 1 percent of the total EF&I costs for 12 pairs to about 36 percent for 4200 pair. Engineering, placement, exempt and other material, and overheads range from 98 percent of the total EF&I costs for 12 pairs to 23 percent for 4200 pairs.

On balance, we find that Sprint's material and placement costs are reasonable.

In summary, the appropriate assumptions and inputs for fiber and copper cable material and placement costs to be used in the forward-looking recurring cost studies considered in this proceeding are those proposed by Sprint. Additionally, these assumptions and inputs shall incorporate adjustments made in all other applicable sections.

VII (k): DROPS

This issue addresses what are the appropriate assumptions and inputs to be used in the forward-looking recurring UNE cost studies for drops.

A. ARGUMENT

No party other than Sprint took a position or filed testimony on this issue. Therefore, we make our findings based on the limited testimony Sprint provided in the record and the position Sprint filed in its post-hearing brief. According to its post-hearing brief, Sprint believes that its current cost model inputs for drops are appropriate. Sprint witness Dickerson provided a summary description of Sprint's cost model drop inputs, which is echoed in Sprint's position statement:

> The drop wire and terminal inputs reflect Sprint's current vendor material costs and applicable Florida-specific sales tax and exempt material loadings. The placement cost portion of the inputs for aerial drops and both aerial and buried terminals are based on Florida-specific labor hour costs and labor hour estimates. The placement cost for a buried drop is based on Sprint-Florida's Florida-specific contractor cost for buried drop placement.

A more detailed outline of Sprint's cost model inputs for drops is provided in Sprint's SLCM documents:

> Aerial drop costs include the cost of the drop wire that is placed from the terminal on or near a pole, to the

customer's location, terminating at the NID. Included in this cost are the attachment devices and the labor to install the drop. The aerial drop material cost is a weighted composite cost of a 2 pair 18 ½ gauge copper drop for residential customers and a 6 pair 22 gauge copper drop for business customers. These drop types are weighted using a ratio of residential and business lines to total lines in the serving territory.

The cost of aerial drops is an installed cost, which includes the material cost and the labor cost to install the cable. To determine the labor portion, average installation time and drop length were determined by an outside plant expert. A state specific loaded labor rate was then applied to the installation time to determine the installation cost per drop. The installation cost per drop is then divided by the drop length to determine a labor cost per foot. Sprint I & R Technicians generally complete the installation of aerial drops.

The aerial drop material is a weighted average cost of the 6 pair cable used for business drops and a 2 pair cable used for residential drops. These two cable types were weighted using a ratio of residential and business lines to total lines. This weighted material cost is added to the per foot labor charge to determine the aerial drop cost per foot.

Buried drop costs are the costs of the drop that is buried from the pedestal to the NID attached to the customer's premises. The buried drop material costs are a weighted composite of the cost of 4 pair, 18 ½ gauge copper drop for residential customers, and 6 pair, 22 gauge copper drop for business customers. These two drop types were weighted using a ratio of residential and business lines to total lines in the serving area.

The cost of buried drops includes the material cost and the labor cost to install the cable. Labor costs are based on company-specific contracts for burying drops which are paid on a per drop basis - not a per foot basis. The per-foot labor cost is calculated by dividing

> the contract installation cost per drop by the average buried drop length. The average buried drop length is based on the average feet plowed for a buried drop.
>
> The buried drop material is the weighted cost of the 6 pair cable used for business drops and the 4 pair cable used for residential drops. These two cable types were weighted using a ratio of residential and business lines to total lines. This weighted material cost is then added to the per foot labor charge to determine the aerial drop cost per foot.

Sprint opines in its post-hearing brief that this Commission should adopt these inputs proposed for drops as they were unopposed by any party.

B. DECISION

The drop is the cable that extends from the customer's premises to the terminal. The terminal is where the drop wires are connected to the distribution cable. See Order No. PSC-99-0068-FOF-TP at p. 176. After reviewing the documentation provided by Sprint witness Dickerson in Exhibit 2 and the corresponding workpapers in Exhibit 3 (a confidential document in this proceeding) we find that the various material and labor assumptions used to calculate drop costs, which are based on Sprint's current vendor material costs, Sprint's Florida-specific contractor cost and Florida-specific labor hour costs and labor hour estimates, are reasonable. Therefore, we find that the appropriate assumptions and inputs for drops are those reflected in Sprint's current cost study model.

VII (1): NETWORK INTERFACE DEVICES

This section addresses what are the appropriate assumptions and inputs to be used in the forward-looking recurring UNE cost studies for NIDs.

A. ARGUMENT

No party other than Sprint took a position or filed testimony on this issue. Therefore, we make our findings based on the limited testimony Sprint provided on the record and the position

Sprint filed in its post-hearing brief. Sprint believes that its current cost study model inputs for drops are appropriate. Sprint witness Dickerson provides a summary description of Sprint's cost model NID inputs:

> The material cost portion of these UNEs reflects Sprint-Florida's current vendor purchase cost for the three respective NID types. Installation of NIDs and Smartjack devices is included in the non-recurring charge cost study.

During his deposition, Sprint witness Dickerson provided a more detailed outline of how its 6-line NID is modeled in the Sprint cost model study:

> . . . a housing for a six-line NID which is what we install today on new installs. The materials inside the NID is [sic] just the materials sufficient to serve two lines. So basically you have the cost of a two-line NID with a six-line housing which allows you to efficiently serve additional lines there by adding additional materials inside the housing if the demand at that location requires it.

The other parties failed to file a position in either their pre-hearing statements or post-hearing briefs.

B. DECISION

We compared the proposed inputs and assumptions for NIDs with Sprint's current rates for NIDs in its Access Service Tariff. (Sprint-Florida, Access Service Tariff, Section E19.8.2, p. 40.1; Section E19.8.6, p. 45, Effective 10/27/99) We understand that Sprint no longer provisions a 2-line NID for residential customers. Sprint now provisions either a 6-line NID housing or a 25-line NID. Although the 6-line NID housing has the capacity for 6 lines, Sprint assumes the provisioning of 2-lines for its new customers and only installs additional lines if requested.

We note that the NID inputs and assumptions in the Sprint cost study provide the ALECs with more favorable monthly rates for Smartjacks, with a decrease of $3.51, and non-recurring charges for a 2-line NID connection/installation, with a decrease of $20.36. The trip charge and monthly rate for a 2-line NID have increased by 2.5 and 1.0 percent, respectively, since the October 1999 effective date of the current Sprint-FL Tariff.

After reviewing the documentation provided by Sprint witness Dickerson in Exhibit 2, we find that the various material and labor assumptions used to calculate NID costs, which are based on Sprint-Florida's current vendor material costs, Sprint's Florida-specific contractor cost and Florida-specific labor hour costs and labor hour estimates, are reasonable. Therefore, we find that the appropriate assumptions and inputs for NIDs are those reflected in Sprint's current cost study model.

VII (m): DIGITAL LOOP CARRIER COSTS

This section addresses the appropriate assumptions and inputs to be used in the forward-looking recurring UNE cost studies for digital loop carrier costs.

A. ARGUMENT

There appears to be a disagreement among the parties as to what type of digital loop carrier (DLC) configuration should be modeled. Sprint believes its DLC inputs are appropriately modified to reflect a lower cost GR-303 Integrated DLC (IDLC) configuration only when a loop and a port are ordered and provisioned together. Sprint does not model its stand-alone UNE loop model assuming an IDLC configuration; instead, it utilizes Universal DLC (UDLC), a more expensive configuration. According to Sprint witness Dickerson ". . . Sprint's DLC inputs for stand-alone unbundled loops reflect the additional equipment requirements necessary to deliver dedicated unbundled loops to ALEC customers collocated at the central office. This additional equipment is the Central Office Terminal and DS-0 level line card." Sprint witness Cox further explains:

> The elements of UNE-P for this filing consist of a 2-wire loop and switching port. The benefits that result are related to using a GR-303 switch interface. The primary difference between the cost of a loop and port that are sold in combination (UNE-P) and those elements purchased

> on a standalone basis, is the result of the technology used to provide the elements. The technical difference between unbundled loops and ports purchased as part of UNE-P, is that the GR-303 interface is used in place of an analog interface. With GR-303, the Integrated Digital Loop Carrier (IDLC) Central Office Terminal (COT) is integrated with the central office switch. This permits connectivity between the switch and COT at the DS-1 level in lieu of individual switch line cards and COT line cards connected back to back with analog jumpers. The positive economies for loops sold in combination with switching are related to the differences in labor and material in the IDLC system and to the substitution of DS-1 level for line level switch and COT interfaces.

Additionally, Sprint witness Dickerson states:

> . . . the DLC inputs are appropriately modified to reflect a lower cost GR-303 Integrated (IDLC) configuration. This IDLC configuration can be utilized in UNE-P applications because the link between the DLC and the switch can be combined with other customers served by the DLC and integrated straight into the switch on a common path. This reduces the cost of the DLC inputs by removing the central office equipment and DS-0 level line card costs necessary in stand-alone UNE loop applications.

Sprint witness Dickerson states that the cost study assumes 100 percent use of Universal Digital Loop Carrier (UDLC) for stand-alone loops. He explains "every stand-alone loop that's sold will have to be configured in that manner (UDLC). So in computing the stand-alone unbundled loop prices, that's the proper way to model. When we model the sale of loop and switch port combinations, we model using an integrated Next Generation Digital Loop Carrier (NGDLC) network deployment." When asked his understanding of the difference between NGDLC and UDLC, witness Dickerson replied:

> I don't think it differs automatically at all. I think it's just meant to connotate the latest state of the art

> for a remote terminal digital loop carrier device. And again, NGDLCs in order to provide unbundled loop paths are necessarily configured with the DS-0 level line cards plugged into the central office terminal at the central office, and some people refer to that as a universal configuration. It's a necessary configuration to provide an unbundled loop.

FDN did not file testimony on this issue. However, in its post-hearing brief FDN points out that Sprint utilizes IDLC as part of Sprint's own technology. Further, IDLC has played an increasingly important role throughout the footprint of Sprint's network. As a result, FDN asserts that IDLC should be considered a "currently available" technology, the subject of the FCC's regulation 47 C.F.R. § 51.505(b)(1) that was recently upheld by the United States Supreme Court[14] and in other state PSC rulings.[15] Additionally, FDN notes that these rulings "provide that UNE costs must be based on the use of the most efficient telecommunications technology currently available and require that prices for interconnection and access to unbundled network elements should be developed from a forward-looking economic cost methodology based on the most efficient technology deployed in the incumbent LEC's current wire center locations."

B. DECISION

We are again troubled by the fact that no party filed testimony in opposition to Sprint on this issue. Further, we note that FDN, the only opposing party to state a position, did not do so until its post-hearing brief. Digital Loop Carrier is network transmission equipment that is used to reduce the number of copper feeder pairs or cables needed to activate the necessary distribution pairs. It multiplexes multiple voice grade channels

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[14] Verizon Communications Inc., et al., v. Federal Communications Commission, et al., 152 L Ed. 2d 701, 122 S. Ct. 1646, 2002 U.S. Lexis 3559 (May 13, 2002).

[15] In the Matter, On the Commission's Own Motion, to Consider the Total Long Run Incremental Cost for All Access, Toll, and Local Exchange Service Provided by Ameritech Michigan.

onto one fiber facility to the central office. We agree with Sprint witness Dickerson that UDLC, the DLC configuration proposed by Sprint for stand-alone loops, reflects the additional equipment requirements necessary to deliver dedicated unbundled loops to ALEC customers collocated at the central office. Additionally, we agree with the claim, unrefuted by record evidence, made by Sprint witness Dickerson that suggests that every stand-alone loop that is sold will have to be configured utilizing UDLC technology; however, when modeling the sale of loop and switch port combinations, IDLC network deployment should be used. As a result, we find that the Sprint cost study's utilization of UDLC for the provisioning of stand-alone loops is based on the most efficient telecommunications technology currently available and on the most efficient technology deployed in Sprint's current wire center locations.

We find that the appropriate assumptions and inputs to be used in the forward-looking recurring UNE cost studies for digital loop carrier costs are those proposed by Sprint.

VII (n): TERMINAL COSTS

A. ARGUMENT

In his deposition, Sprint witness Dickerson was asked what terminal costs were, and responded that ". . .terminals can be drop terminals where the distribution pair is terminated on one side and the drop pairs are terminated on the other side and they're cross-connected within that terminal. It's generally a place to make connections between two segments of cable."

Witness Dickerson explained that terminal costs are determined by identifying the vendor cost of material, sales tax, and labor costs, with the sum of these costs becoming the model input. They are modeled based on different sizes of terminals and the model can match the size of the terminal with the demand at the point where it is being placed.

Sprint's Loop Module provides the following information about the costs of both aerial and buried drop terminals:

- The model will reflect enclosures that are able to hold up to 25 pair terminal blocks.
- The model places terminals based on the number of connecting drops, with either a 6, 12, or 25-pair terminal block being placed.
- The splice closure, terminal block, and labor costs are included in the installed cost of the terminal block, with installation costs being based on outside plant experts' time estimated and Sprint's labor rates.

B. DECISION

Sprint is the only party that provided testimony or has a position concerning this issue. Therefore, based on the limited record on this issue, we find that the assumptions and inputs for terminal costs proposed by Sprint are appropriate and find that they shall be used in conjunction with the changes in other applicable issues.

VII (o): SWITCHING COSTS AND ASSOCIATED VARIABLES

The issue before us is to determine the appropriate assumptions and inputs for switching costs and associated variables that will be used in the forward-looking recurring UNE cost studies. We note at the outset that Sprint was the only party to provide any testimony on this issue.

A. ARGUMENT

Sprint witness Cox states "Sprint uses the FCC's original recommendations in the First Report and Order to develop recurring switching costs." Sprint cites to FCC 96-325, ¶810, which states,

> We conclude that a combination of flat-rate charge for line ports, which are dedicated to a single new entrant, and either a flat-rate or per-minute usage charge for the switching matrix and for trunk ports, which constitute shared facilities, best reflects the way costs for

> unbundled switching are incurred and is therefore reasonable.

Sprint argues that its three cost components - usage-sensitive switching, flat-rated port, and flat-rated features - are consistent with the FCC's recommendation. In general, witness Cox asserts that Sprint's approach to switching cost development is to differentiate between fixed and variable cost components. Moreover, witness Cox states, "[t]he variable component's investment in the switch are divided by the call attempts and minutes of use (MOU), while the fixed components of the switch are divided by the lines in the switch."

The costs for circuit switching are developed using Switching Cost Information System (SCIS) and Sprint's Switching Cost Model (SCM). Sprint states,

> Total investment is derived from the Telcordia SCIS (Switching Cost Information System) model, and combined with actual usage information and company-specific vendor switch discounts to derive TELRIC investment results for each host office complex. The SCIS model is a widely used and accepted industry model for determining switching investment.

According to witness Cox, SCIS considers vendor-specific hardware for each central office (CO). Costs for software and power investment are determined separately and included in the SCM inputs, along with the SCIS results. As such, Sprint contends that:

> [s]witching costs are provided on a per exchange basis. Each exchange reflects the cost characteristics of the host/remote switching complex providing service to that exchange.

Witness Cox asserts that call set-up costs and call duration costs are determined separately in the costing process. These costs are easily separated using SCIS, with call set-up costs consisting of central processor costs required to set-up the call, and a per minute-of-use (MOU) cost consisting of line and trunk portions of the switch. Common costs are also included here. He refers to this process as a ". . . bifurcated cost development process."

Sprint asserts that its costs reflect a blended discount process which takes into account new discounts, new growth, and growth discounts. The Sprint model reflected 74% weighting on new and a 26% weighting on growth discount for the Nortel switching equipment. In addition, Sprint witness Cox notes that the Lucent switching equipment shows the same discounts, with ". . . no differentiation for new or growth."

Sprint witness Cox asserts that the SCM TELRIC methodology consists of six (6) basic steps. These steps are repeated for each switch studied. Witness Cox states "[t]he first step is to determine the total forward-looking switching investment using the SCIS model." He adds that for each central office (CO), Sprint has modeled the "current technology that's there in place." According to witness Cox, both the Nortel DMS-100 and the Lucent 5ESS switches were studied. Of the switches studied, 30% are 5ESS switches and 70% DMS100s. The 5ESS was ultimately modeled, and witness Cox asserts that the 5ESS is in place and forward-looking. According to Cox, the use of the 5ESS was the result of ". . . an engineering decision that was made." He adds that individual host switches in Florida ". . . are predominately Nortel DMS-100 technology . . ."

Total switch investment consists of several investment categories, including:

1. Getting Started - the investment required to provide call set-up costs.
2. Fixed Line - the investment required to terminate the local loop in the central office. It is composed primarily of a line card, the main distribution frame, and protector.
3. Line Usage - the investment associated with usage sensitive line-side switching. It consists primarily of line concentration equipment, digital links, controllers, and a portion of the network

modules. Trunk Usage - the investment with usage sensitive trunk-side switching. It is composed primarily of digital trunk controllers, DS1 links, and a portion of the network modules. Umbilical Usage - the usage sensitive investment in host-remote links.

4. SS7 Link - investment associated with the SSP (Service Signaling Point) located in the central office.

Witness Cox notes that "getting started" investment is essentially ". . . the costs associated with the processor and a switch."

After SCIS determines the investment associated with each switch in Sprint's network and partitions the investment into the aforementioned categories, the remaining steps occur in the SCM. These steps include determining the number of processor milliseconds required to process each type of call, deriving monthly expense per investment category, calculating the cost per call set-up and call type, and calculating the cost per MOU by call type. The results of each of these steps is contained in Exhibit 2, Vol. II, under the "Switching" tab. Furthermore, witness Cox states that each CO's TELRIC results (minus the common cost factor) are summarized under the "Cost Summary" worksheet, also found in Exhibit 2, Vol. II. The SCM switching results are segregated between the costs for host/remote complexes and the costs for tandem offices.

Next, the SCIS/IN (Switching Cost Information System/Intelligent Network), an adjunct model to SCIS, is used to determine costs for the ". . . most prevalent features." The prevalent features for which costs were computed include twenty-four Centrex features, eight CLASS features, ten Custom Calling features, and eight ISDN-BRI features. Features resulting from SCIS/IN for Centrex can be located in EXH 12, pp.79-89, and ISDN features on pp. 90-96. Witness Cox states "[a]ctual usage and demand information for Florida was used in the SCIS/IN model." He goes on to state:

> Second, the SCIS/IN model only aggregates resource costs for the switch resources consumed, along with costs for any additional hardware required to provide the feature. Software costs are added separately.
>
> Third, the annual charge factor is applied to derive an annual cost.
>
> Fourth, the annual cost is divided by twelve to derive a monthly cost.
>
> Fifth, the common cost factor is applied to determine the total cost of the features in each category, for a total feature package cost.

Witness Cox proffers that Sprint has developed feature packages that may be purchased with a switching port. Individual packages of features (Custom Calling, CLASS, Centrex, and BRI-ISDN) may be selected for provisioning on single lines. Witness Cox claims that this arrangement keeps ALECs from having to purchase undesired feature capability, while allowing Sprint to recover its feature-related costs on a per port basis. He states that feature capability cannot be purchased without also purchasing the switching port. Once the port is purchased, Sprint allows the ALEC to customize the switching port it has purchased. The Sprint witness contends that ". . . feature capability is an integral part of the switch." In support of this argument, witness Cox offers the following:

> The definition of the local switching UNE that came from the UNE Remand Order is that '. . . local circuit switching as including the basic function of connecting lines and trunks. In addition to line-side and trunk-side facilities, the definition of the local switching element encompasses all the features, functions and capabilities of the switch.'

UNE Remand Order at ¶ 244[16]. Citing to footnote 475 in the UNE Remand Order in response to an interrogatory, Sprint witness Hunsucker adds that:

> . . . The local switching element includes all vertical features that the switch is capable of providing, including customized routing functions, CLASS features, Centrex and any technically feasible customized routing functions. Custom calling features, such as call-waiting, three-way calling, and call forwarding are switch-based calling functions.

In addition, Sprint contends:

> Paragraph 816 of the First Report states '. . . we concluded earlier that vertical features are part of the unbundled local switching element, because they are provided through the operation of the hardware and software comprising the 'facility' that is the switch.'

The approach to determining tandem switching costs follows that of local switching, and assumes that the cost of local switching is equal to local trunk-to-trunk switching. Sprint witness Cox states, "[t]andem switching charges apply if local traffic goes through both a local tandem switch and an end-office switch to reach a customer; both rates would apply (as well as common transport) and are simply added together."

In conclusion, Sprint adds that its position was unopposed by any party in this proceeding.

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[16]Third Report and Order, CC Docket No. 96-98, In the Matter of Implementation of the Local Competition Provision of the Telecommunications Act of 1996, FCC Order 99-238, (released November 5, 1999) (UNE Remand Order)

B. DECISION

We find that Sprint has properly assumed the use of SCIS in average mode to determine switch investment. The average investment calculation is based on a switch's total investment to support total demand. On the other hand, the SCIS marginal investment calculation compares total switch investment ". . . divided by the capacity to the capacity of the processor, assuming switch exhaust." We agree with Sprint's assumptions related to using the average investment mode are proper and consistent with TELRIC methodology.

We note that Sprint's proposed rate for local switching is $.002274 per MOU based on a statewide average. Moreover, even though witness Cox stated that he was not familiar with BellSouth's approved switching rate, we believe that it is important to note that the rate for BellSouth is $.0007662 per MOU. As alluded to in witness Cox's deposition, Sprint's proposed rate is almost 300% higher than BellSouth's approved rate.

We have concern regarding the usage and demand data gathered for use in SCIS/IN to generate feature costs. According to Sprint's response to a staff discovery request, the data used were from studies completed in 1996. Moreover, the usage and demand data does not consist of data for all of Sprint-Florida's wire centers. Instead, the company used selected data collected from all Sprint regions, not just Sprint-Florida wire centers. Sprint offers as a rationale for this approach:

> Since usage data for some features were unavailable in some regions, but feature data was available in other regions, Sprint decided that a system-wide, weighted SCIS/IN feature input based on all the regional results would be most accurate. Sprint assumed that customer use of features is consistent across the regions. Feature and switch Subject Matter Experts (SMEs) reviewed the resulting input data for reasonableness.

In light of the Company's response to this discovery request, we are somewhat troubled by Sprint witness Cox's assertion in his testimony that "[a]ctual usage and demand information for Florida was used in the SCIS/IN model." Although apparently some Florida-specific usage and demand data were used in Sprint's analyses, staff is unable to discern for what features or geographic areas Florida data was used. Further, we question to what extent the data used represents ". . . system-wide weighted SCIS/IN feature input." Rather, it appears that Sprint may have merely assembled usage and demand data for a given feature wherever it could obtain it. Finally, we note that the record is silent as to Sprint customers' feature subscription levels in Florida as opposed to levels in other Sprint service areas; as such, we have no basis to evaluate Sprint's assumption that customer use is consistent throughout its various regions.

As noted above, Sprint chose to determine feature costs for those 50 features which were "the most prevalent." According to a discovery response, the Company identified these 50 features based on a review of actual data on retail features in-service. These represent the features which are most commonly sold. Sprint-Florida asserts that packaging the most prevalent features was done for customer benefit. We agree that using feature packages minimizes the complexity for ordering features and reduces the number of billing charges a customer might verify. Moreover, although Sprint is proposing rates for a limited number of switch features, the Company notes that if an ALEC desires additional features it would provide a price quote upon request. However, according to Sprint, none have been requested to date. Although these features were originally packaged for the retail market, Sprint believes that demand for feature selection would be similar on the UNE side. Based on that belief, Sprint offers CCF, CLASS, Centrex and ISDN packages, but at year-end 2001, no UNE features or feature packages had been purchased.

We agree with Sprint that an ALEC cannot purchase switch features without also purchasing a port. We concur with Sprint's understanding that:

> . . . features are an inherent capability provided by the switch and therefore inseparable from the port. The features and functions are the switch. If a customer

> wanted to buy UNE features separately from the port, they are essentially creating a new UNE, further unbundling the local switching UNE in that case. Sprint-Florida considers this definition to mean that the FCC clearly has stated that port and features are inseparable, and features can only be provided with a port. (emphasis added)

We note that although not provided with the initial filing, Sprint did make available the determinants for software and power investments. Sprint's software costs are proprietary and are provided by the vendor. Despite the information being proprietary, Sprint asserts that no software costs attributable to non-studied features were included in feature costing. Power investment is comprised of battery chargers, power boards, battery distribution bay, battery plant, copper cables, cable rack and ground cabling. This investment is necessary to provide DC power to central offices and for commercial consumption.

The appropriate assumptions and inputs for switching costs and associated variables to be used in the forward-looking recurring UNE cost studies are those proposed by Sprint. Sprint's assumptions and inputs are forward-looking and indicative of switching that Sprint can and would use, both currently and prospectively. In addition, the changes in all other applicable issues shall be reflected in this section.

VII (p): TRAFFIC DATA

A. ARGUMENT

According to Sprint witness Cox, the approach to switching costs development is to distinguish between the fixed and variable switch cost components. The variable components' investment in the switch are divided by the call attempts and minutes of use (MOU), while the fixed components of the switch are divided by the lines in the switch. The following criteria were associated with the traffic data used in the cost study:

3. Sprint-Florida specific.

4. Studied DMS Host/Remote/Tandem wire centers.

5. Traffic Data studied in 2000.

6. Traffic includes all jurisdictions; local/toll/access.

Traffic data is utilized principally in the switching and transport UNE cost studies. Traffic data is utilized to calculate the usage sensitive costs associated with the central office host, remote and tandem switches.

The average monthly minutes of use per DS1 were used to calculate the Common Transport Rate per Minute of Use (MOU). Witness Cox states that "The largest single determinant in the unit cost of a DSO, DS1, DS3, OC3, or OC12 transport circuit, is the volume of telecommunications traffic transmitted over a specific transport route." The witness continues that "[t]his volume of traffic, or demand, determines both the appropriate capacity sizing of the terminal equipment and fiber cable." The witness asserts that "[a]s volumes of traffic vary across specific transport routes, so do the sizing and utilization of terminals and fiber cable, and ultimately the resulting unit costs." No other parties filed testimony on this issue.

B. DECISION

We find that the appropriate assumptions and inputs for traffic data are those proposed by Sprint.

VII (q): SIGNALING SYSTEM COSTS

A. ARGUMENT

Sprint witness Fuller states that SS7 provides a signaling path to transmit and receive information for call completion. He explains that signaling system seven (SS7) interconnection consists of Signal Transfer Point (STP) ports, interconnecting facilities, and STP switch usage.

TABLE 7(q)-1: Components of SS7	
Component	Purpose
STP Port	Provides customer access to the Sprint STP
STP Transport Link	Facility that connects the ALEC customer's designated premises to the Sprint STP
STP Switching Usage	Provides routing of ISDN User Part (ISUP) messages through an STP

Witness Fuller contends that "[c]are has been taken to exclude port costs from the STP switching usage investment. Florida-specific annual charge factors, equipment fill factors, and demand are used in the calculations."

FDN and KMC took no position on this issue in their briefs. As noted by Sprint in its brief, Sprint's position and record evidence on this issue was unopposed by any party.

B. DECISION

Although no party addressed SS7 specifically, we note that Sprint's proposed rates will be impacted by adjustments made to inputs in the model that are used to calculate the SS7 rates, such as annual charge factors and equipment fill factors.

We find that Sprint's proposed SS7 rates and rate structure shall be accepted, subject to changes that result from changes to specific inputs that are addressed in other sections.

<u>VII (r): TRANSPORT SYSTEM COSTS AND ASSOCIATED VARIABLES</u>

The only party proffering testimony on transport inputs and associated variables is Sprint.

A. ARGUMENT

In its simplest definition, transport system costs and associated variables refers to the costs of transport between wire centers. It is also commonly known as interoffice transport or IOT.

Sprint's witness Cox refers to the FCC's definition of unbundled interoffice transmission facilities:

> . . . as incumbent LEC transmission facilities . . . dedicated to a particular customer or carrier, that provide telecommunications between wire centers owned by incumbent LECs or requesting telecommunications carriers, or between switches owned by incumbent LECs or requesting telecommunications carriers.

47 CFR §51.319 (d).

Witness Cox explains that transport of the unbundled interoffice transmission facilities is composed of two basic network components: terminals and fiber cable. Witness Cox testifies:

> Terminals are the equipment housed at the central office locations, and serve as entry and exit points for telecommunications traffic to be moved between interoffice points in the network. In the majority of today's transport networks, and certainly in a forward-looking network, these interoffice terminals will be optically capable. Additionally, the fiber transport routes in a forward-looking network are constructed in ring design, which provides diverse routing capability in the event of a fiber cable cut, or terminal node failure.

Routing diversity provides the automatic rerouting of traffic over the remainder of the ring if there is a cable cut or terminal node failure. Witness Cox notes that ring technology has become the industry standard technology.

Witness Cox notes that the First Report and Order, states:

> We require incumbent LECs to provide unbundled access to shared transmission facilities to provide unbundled

> access to shared transmission facilities between end offices and the tandem switch. Further, incumbent LECs must provide unbundled access to dedicated transmission facilities between LEC central offices or between such offices and those of competing carriers. This includes, at a minimum, interoffice facilities between end offices and service wire centers (SWCs), SWCs and IXC POPs, tandem switches and SWCs, end offices or tandems of the incumbent LEC, and the wire centers of the incumbent LECs and requesting carriers. The incumbent LEC must also provide, to the extent discussed below, all technically feasible transmission capabilities, such as DS1, DS3, and Optical Carrier levels (e.g. OC-3/12/48/96) that the competing provider could use to provide telecommunications services. We conclude that an incumbent LEC may not limit the facilities to which such interoffice facilities are connected, provided such interconnection is technically feasible, or the use of such facilities. In general, this means the incumbent LECs must provide interoffice facilities between wire centers owned by incumbent LECs or requesting carriers, or between switches owned by incumbent LECs or requesting carriers. For example, an interoffice facility could be used by a competitor to connect to the incumbent LEC's switch or to the competitor's collocated equipment.

<u>See</u> FCC Order 96-325 at ¶440.

In keeping with the <u>First Report and Order</u> (FCC Order 96-325), witness Cox explains that Sprint's Transport Cost Model (TCM) determines the TELRIC of interoffice transport for a DS0, DS1, DS3, OC3, and OC12 in support of unbundled elements. According to the TCM methodology, the major determinants of transport cost are engineered, furnished, and installed (EF&I) investments, terminal bandwidth, utilization, and mileage as applied to Extended Area Service (EAS) routes in the provision of common and dedicated transport.

Network Components:

Witness Cox explains that the network components should include all of the direct cost components required for the service to be fully functional. Sprint includes the following in the development of transport system costs:

- Fiber optic cable
- Fiber tip cable
- Fiber patch panel
- Fiber optic terminals (OC-3, OC-12, and OC-48)
- OC-3 cards
- OC-12 cards
- DS-3 cards
- DS-1 cards
- Installation cost
- Capacity
- Utilization factors
- Pole and conduit factors
- Annual charge factors
- Aerial, buried, underground mix

1. Associated Variables

Additionally, witness Cox asserts that the associated variables to be considered with transport system costs include traffic volume, terminal bandwidth, and distance. The witness explains that the largest single determinant in the unit cost of a DS1, DS3, OC3, or OC12 transport circuit, is the volume of traffic transmitted over a specific transport route. The volume of traffic, or demand, determines the appropriate capacity sizing both of the terminal equipment and fiber cable. Moreover, the demand defines the units over which these costs are spread.

Witness Cox asserts that, as traffic volumes or demand increases, larger terminals with increased capacity are used which results in greater economies and lower unit costs. The witness states that a basic characteristic of fiber cable is that the volume of traffic is a function of the optical terminal's bandwidth/capacity (OC3, OC12, OC48) placed on the fiber ring. Witness Cox explains that the same traffic volume that drives the unit cost of the terminals is also a major determinant in the transport unit cost of the fiber. As with terminals, the more traffic that a specific transport route carries, the lower the unit cost of a DS0, DS1, DS3, OC3, or OC12 on that route.

Regarding distance, witness Cox testifies that more fiber cable must be placed as the distance around a transport ring increases, thereby increasing the cost of bandwidth on that ring. The witness explains that the potential for multiple Synchronous Optical Network (SONET) rings to transport traffic between certain end offices is unavoidable due to ultimate capacity constraints of terminal equipment and the need to construct fiber rings that link the predominant communities which originate and terminate the largest volumes of traffic on any given ring.

2. Terminal Cost Inputs Assumptions

Witness Cox testifies that Sprint's transport cost inputs recognize the following assumptions:

- Transport terminal cost is based on Sprint-Florida specific data;
- Utilizes forward looking technology;
- Includes optical-based transmission equipment costs only;
- Capable of costing OC3, OC12, and OC48 transport rings individually; and
- Reflects the use of LEC's existing wire centers

More specifically, the witness states that the terminal cost should be developed by terminal bandwidth (OC3, OC12, and OC48) and should include all of the common components required to make the terminal operational. Such components include "relay racks, shelves, line interface, common shelf processor, tributary shelf processor, receive/transmit access module, tributary transceiver, line shelf power supply, common shelf power supply, ring controller, synchronizer card, USI-LAN interface, software, cables, cover, DS3 switch, transmitters, craft interface equipment and software, and common complement of spare equipment." The witness notes that additional line or drop interface equipment is required for the hand off of DS0s, DS1s, DS3s, OC3s, and OC12s.

Witness Cox explains that Sprint's interoffice transport terminal cost inputs reflect current vendor material costs and applicable Florida-specific sales tax. Additionally, the engineering and installation labor inputs are developed by Sprint Engineering as typical work durations considered appropriate for the cost study. Moreover, Florida-specific labor rates have also been utilized.

Witness Cox explains that the TCM contains three input sheets, and several worksheets. The first input sheet shows the inputs of material, engineering and installation cost data:

- Fiber optic cable
- Fiber tip cable
- Fiber patch panel
- Fiber optic terminals (OC-3, OC-12, and OC-48)
- OC-3 cards
- OC-12 cards
- DS-3 cards
- DS-1 cards
- Installation cost
- Capacity
- Utilization factors
- Pole and conduit factors
- Annual charge factors
- Aerial, buried, underground mix

The second input sheet contains each transport ring's characteristics, redesigned using least cost, forward-looking technology. Witness Cox explains:

> For example, a current transport system between three locations may be provided through three separate, point-to-point transmission systems. TCM, in most cases, reflects this network as a single fiber ring with three fiber optic terminals.

Witness Cox states that the ring characteristic inputs are:

- Ring Name

- Ring Number
- Segment Name
- Ring Type
- Segment Actual Miles
- Number of Repeaters
- Terminal Size
- Number of DS1 Terminations
- Fiber Tip Cable (Per Fiber) Utilization.
- Fiber Patch Panel (Per Fiber) Utilization
- SONET Terminal Shelf (OC3, OC12, and OC48) Utilization
- OC12 Card Utilization
- OC3 Card Utilization
- DS3 Card Utilization
- DS1 Card Utilization
- DSX3 Cross Connect Shelf
- DSX3 Cross Connect Card
- DSX1 Cross Connect Jack Field
- Channel Bank Shelf
- Channel Bank Card
- Aerial Fiber (Per Fiber) Utilization/Sharing
- Underground Fiber (Per Fiber) Utilization/Sharing
- Buried Fiber (Per Fiber) Utilization/Sharing
- OC3 Card (For Dedicated OC3 Service)

Witness Cox explains that the third group of TCM inputs are the transport routes. These inputs develop a route-specific common and dedicated transport cost for DS0, DS1, DS3, OC3, and OC12. In addition to the route, the appropriate rings the route will utilize are input. These inputs include:

- Route Originating
- Route Terminating
- Non Sprint Node
- 1^{st} - 8^{th} Ring Number Utilized

According to witness Cox, the TCM includes the following five basic steps in calculating dedicated (DS0, DS1, DS3, OC3, and OC12) transport:

1. Convert the total utilized capacity of each type of transmission into a cost per DS1.
2. Calculate the costs of each six types (OC12, OC3, DS3, DS1, terminal pass-through, and interconnection fiber pass-through).
3. Calculate the cost per route mile of fiber facilities, or transit. This cost includes the costs of providing route diversity, or protection.
4. Determine the termination and transit costs of each fiber ring. The end result is the termination and transit costs of dedicated DS0, DS1, DS3, OC3, and OC12 transport.
5. Convert the termination and transit cost to a weighted average cost for termination and transit for each of the dedicated bandwidth options, DS0, DS1, DS3, OC3, and OC12.

The witness notes that the common cost factor is then added to develop the TELRIC cost of DS0, DS1, DS3, and OC12.

3. Fill Factors

Regarding fill factors, witness Cox testifies that the FCC states:

> Per-unit costs shall be derived from total costs using reasonably accurate "fill factors" (estimates of the proportion of a facility that will be "filled" with network usage); that is, the per-unit costs associated with the element must be derived by dividing the total cost associated with the element by a reasonable projection of the actual total usage of the element.

<u>See</u> FCC Order 96-325 at ¶682.

Witnesses Cox and Dickerson describe fill or utilization factors as the percentage of available network capacity actually used. Three factors contribute to utilization:

- <u>Anticipation of future needs</u> is that factor whereby telecommunications companies determine their future plant needs considering the fact that it is cheaper to install facilities for future demand than to install facilities as they are needed,

- Capacity Acquired in "Blocks" is the element that capacity is only available in certain sizes; therefore, unused capacity will exist, and

- Construction Time is the amount of time needed to plan and construct facilities when replacing or expanding capacity.

Witness Cox notes that efficient deployment balances the cost-benefit relationship of unused capacity and the cost of installation. The witness explains that not enough capacity results in an inefficient network; too much capacity results in an inefficient use of resources.

Witness Cox asserts that Sprint does not have sufficient traffic to maintain a high utilization factor on all transport routes, given that certain sections of Sprint-Florida are rural. The witness explains that this is due, in large part, to the nature of transmission capacity:

> For example, an OC-3 system has the capacity of 3 DS3s, and an OC-12 system has the capacity of 12 DS3s. When an OC-3 system is exhausted and replaced with the larger OC-12 system, its maximum utilization at the time of cutover is only 25% (3 DS3s/ 12 DS3s). In reality, the cutover takes place prior to absolute exhaustion, so the actual utilization at cutover will be less than 25%.

According to the model documentation, demand is projected to grow approximately 40 percent over the next five years. Sprint has therefore increased current demand levels by at least 20 percent to reflect the mid-point of the projected growth. The documentation notes that existing transmission capacity may be expanded to meet growth in demand, if necessary. If embedded facilities have more capacity than needed to meet forecasted demand, existing transmission capacity may be reduced.

Witness Cox explains that the SONET ring costs are converted into route-specific transport costs on a route by route basis. The ring or rings are identified over which the DS1 will be routed. Costs from the Weighted Termination/Distance Summary for the given ring number will provide the dedicated economic cost for the route listed.

B. DECISION

As noted earlier, there is no testimony from any party on this issue other than Sprint. The only opposing discussion arose in FDN's post-hearing brief, as set forth in sections VII(g), VII(i), and VII(j) of this Order. However, because FDN's arguments address interoffice facility calculations as they relate to dark fiber, we address those here.

FDN alleges that Sprint has included the cost of dark fiber in its loop and transport cost studies and also in the dark fiber study. FDN opines that this results in double counting the same costs.

Sprint witness Dickerson explains that dark fiber is fiber that is not lit, meaning there are no attached electronics. In the interoffice facilities, witness Dickerson asserts that Sprint first analyzes ". . . Florida-specific interoffice transport routes to determine the number of fiber strands required to provide the bandwidth requirements on any given route." The witness states that Sprint assumes a minimum of 36 fibers based on its network planning practices.

Witness Dickerson agrees that Sprint's fiber interoffice facility cost studies are based on expected total demand for fiber facilities. The witness explains:

> The sizing of the fiber cables is based on the demand for higher capacity bandwidth loops and circuits that require fiber, which would be DS-3 and above, and the requirements for fiber to serve DLCs. And those are sized to be two fiber working and two hot standbys. And that requirement then is divided by .75 fill factor, and

> then the closest available fiber cable size that meets that demand requirement is the size that would be modeled.

Additionally, witness Dickerson states that the number of lit fiber strands necessary to meet the route's bandwidth requirements is determined based on actual DS-3 demand. The fiber cable strands for interexchange (IX) bandwidth requirements is then added in the loop cost study. Witness Dickerson explains that the IX fiber routes follow Sprint's existing digital loop carrier (DLC) fiber feeder and DS-3 fiber distribution to result in maximum cable structure sharing between loop and interoffice facilities. Witness Dickerson explains that these calculations are performed for each wire center to determine a statewide weighted average of interoffice dark fiber costs.

Witness Dickerson asserts that Sprint's use of a .75 fill factor for dark fiber is designed to recognize that any fiber cable will have unlit fibers. The fill factor recognizes the spare capacity in the computation of a unit cost. However, when questioned whether the facilities that are used for dark fiber interoffice facilities are the same facilities that are considered the spare capacity of fiber interoffice facilities of lit fiber, the witness responds:

> Not necessarily. Not necessarily at all. We could have lit fiber service to a customer today. We could lose that customer tomorrow, and those could become the fibers that a CLEC then wants to purchase from us on a dark fiber basis to serve that same customer that we used to serve with lit fiber.

Moreover, witness Dickerson asserts that a competitive local exchange carrier (CLEC) purchasing lit fiber transport does not pay for the entire unutilized capacity of the lit fiber transport; simply a pro rata share commensurate with the bandwidth purchases. The witness states that over recovery would occur only if the total utilization exceeds 75 percent.

We have reviewed Sprint's dark fiber cost study and agree with Sprint that the rates ensure CLECs pay a pro rata share of unutilized capacity based on their bandwidth purchase. We believe that this is an equitable approach. Otherwise, the cost of all unutilized bandwidth would shift to retail customers. We think that FDN's disagreement regarding Sprint's dark fiber interoffice transport facilities is unwarranted.

Therefore, we find that the transport inputs and associated variables reflected in Sprint's cost study shall be accepted for purposes of establishing recurring UNE rates in this proceeding, subject to adjustments in other sections.

VII (s): LOADINGS

Sprint is the only party proffering testimony regarding loading factors. Cost model documentation, supporting workpapers, and discovery responses form the basis for our findings.

A. ARGUMENT

Sprint witness Dickerson explains that loading factors for taxes, engineering, placement, splicing, exempt material, and overhead costs are added to the per foot cost of cable. In this way, the per foot cost of cable is converted into a fully engineered, furnished, and installed (EF&I) cost.

1. Taxes

The sales tax represents the tax paid on the purchase of materials and exempt materials. It represents all state and local taxes applied to the purchase.

2. Engineering, Placement, Exempt and Other Material, and Overheads

Witness Dickerson explains that cable loading factors are based on an analysis of Sprint's cable installations in Florida for 1998-2000 from the Project Administration and Costing System (PACS). The costs include exempt and other material, such as splice enclosures and cable mounting hardware, overhead and cable placement, splicing and engineering costs.

The cost of engineering includes such things as route layout, obtaining permits, securing rights-of-way, and joint use coordination. According to the cost study methodology, Sprint develops cable engineering cost on a per foot basis. The cost is based on actual Sprint loaded labor rates for Outside Plant Engineering and an estimate of engineering hours per mile of cable placed, by type of placement. The average per foot cost of engineering cable is developed from Sprint's PACS data by dividing the 1998-2000 expenses incurred with engineering each type of copper and fiber cable (aerial, buried, or underground) by the total feet placed of each type of copper and fiber cable.

Placement costs account for the placing of the cable on a pole line, in a trench, or in a conduit. The costs are developed on a per foot basis and are based on the relationship of total expenditures in PACS related to placing the given type of cable divided by the total number of feet of that cable placed.

Sprint notes that its engineering and placement costs can vary by size, location, and type of cable. Sprint explains:

> Logic stipulates that engineering costs will be greater for larger cables compared to smaller cables. However, when engineers design a route, they will design the entire route, not one piece of cable. Therefore, the inputs to the cost study reflect that routes will be engineered. Sprint-Florida's engineering and placing inputs for a given type of cable do not vary by size of cable. Engineering inputs do not vary by location, but vary by aerial, buried, and underground cable types. Likewise, placing inputs do not vary by cable size, but

> vary by aerial, buried and underground plant type. Placement inputs for buried cable will vary by density zone as the result of changes in the mix of placing activities and shown in the inputs to SLCM.

Regarding exempt materials, Sprint explains that these materials are comprised of items of small value not warranting separate tracking within Sprint's Continuing Property Records system. Examples of exempt materials include aerial cable lashing wire and clamps, gravel used in the bottom of buried cable pedestals/closures, pole steps, bolts, clamps, and markers.

Sprint witness Dickerson explains that the loading factors for exempt materials are based on a relationship of exempt material to material costs using PACS data. In this way, the loading factors vary by cable size. Witness Dickerson notes that this ". . . allows there to be a logical differentiation that larger cables will incur larger levels of exempt material usage."

In addition to the direct labor activities, an overhead loading factor is added to the material cost. Sprint notes that overheads account for the indirect support costs associated with activities that are not directly related to engineering or construction but are necessary components of construction. The model documentation explains that overheads are added as a per-foot cost because the activities do not vary by cable size.

3. Splicing Costs

Sprint explains that "[s]plicing cost accounts for joining two or more cables together by connecting the conductors." The SLCM documentation explains that Sprint develops splicing costs on a per pair foot basis based on the total number of pairs placed and the total number of feet placed obtained from 1998-2000 cable placement records. The total expenses incurred to splice cable is then divided by the total number of pair feet placed to determine a cost per cable foot of splicing. The cost is multiplied by the number of cable pairs for the splicing cost for the particular size cable. In this way, splicing costs vary by size of cable placed.

Sprint's splicing rates per pair foot of cable for each type of cable are shown below in Table 7(s)-1:

TABLE 7(s)-1: Splicing Costs	
Account	Splicing Cost Per Pair Foot
Copper	
Aerial	$0.0056
Underground	$0.0047
Buried	$0.0028
Fiber	
Aerial	$0.0044
Underground	$0.0022
Buried	$0.0058

B. DECISION

The development of Sprint's loading factors is shown in Loop Workpaper 1. Five factors are added to provide an EF&I cost: exempt and other material, placement, splicing, engineering, and overheads. Additionally, sales tax is added. The total cost represents an EF&I cost.

Witness Dickerson testifies that loading factors for exempt and other material, placement, and engineering costs are developed on a cost per foot basis from Sprint's 1998-2000 PACS data. The costs for each of these items are based on the ratio of actual 1998-2000 expenses incurred for copper and fiber cable and specific plant type (aerial, buried, and underground cable) to the total feet of each type of cable placed. In this way, these loading costs are the same cost per cable foot regardless of the size of the cable (i.e., not linear). However, the costs vary depending on the particular cable type whether copper or fiber and also whether the cable is aerial, buried, or underground.

Sprint notes that its engineering and placement costs can vary by size, location, and type of cable. Sprint espouses that engineering costs will be greater for larger cables compared to smaller cables. However, entire cable routes are engineered rather than one piece of cable and the cost study inputs are reflective of this. Sprint's engineering and placement inputs for a given type of cable do not vary by size of cable. Engineering inputs do not vary by location, but vary by aerial, buried, and underground cable types. Likewise, placement inputs do not vary by cable size, but vary by aerial, buried and underground plant type. Placement inputs for buried cable are noted to vary by density zone as the result of changes in the mix of placing activities and shown in the inputs to SLCM.

In addition to the direct labor activities, an overhead loading factor is added to the material cost. The factor accounts for indirect support costs associated with activities that are not directly related to engineering or construction but are necessary components of construction. The model documentation explains that overheads are added as a per-foot amount because the activities do not vary by cable size.

Sprint's development of the cable loading factors (engineering, placement, minor materials, and overhead) results in a constant dollar factor that is added to the per foot material cost. The percent of total EF&I costs associated with these loading factors increases as the size of the cable decreases. For example, 23 percent of the total EF&I costs for a 4200-pair copper underground cable is associated with loading factors. The percentage increases to about 91 percent for a 100-pair cable and about 95 percent for a 50-pair cable.

Sprint's splicing costs are developed on a per pair foot basis and also rely on PACS data. Total splicing costs obtained from PACS are divided by the total pair feet of cable placed. The per pair foot cost is multiplied by the number of cable pairs for the splicing cost for the particular size cable. In this way, splicing costs vary by size of cable placed; the larger the cable size, the greater the splicing costs.

We believe that the Universal Service Order (regarding the determination of the cost of basic local telecommunications service) and the BellSouth Phase II Order can offer some guidance in analyzing Sprint's cable cost inputs. We do not believe the inputs adopted in either referenced order are appropriate to use in this instant proceeding but should only serve as a reference source in our analysis. The Universal Service proceeding related to a legislative mandate and the inputs are more than two years old. Regardless, the adopted inputs were Sprint-specific and can serve as a check for reasonableness of Sprint's proposed inputs in the instant docket. Sprint's total EF&I costs for aerial and underground fiber cable are generally lower than those adopted by the Universal Service Order. Buried fiber cables reflect a slight increase in larger cables to over a 54 percent increase in the smallest sized cables. On the other hand, Sprint's EF&I total costs for copper cables indicate a more substantial increase over those adopted in the Universal Service Order. Again, the increase is found with the smallest sized cables. The greatest increases in total EF&I costs appear in underground copper cables. For example, Sprint's EF&I costs for a 500-pair underground copper cable are almost 300 percent more than the similar cost adopted in the Universal Service Order.

Sprint explains that larger sized cables are found in urban areas; smaller sized cables are found in more rural areas. We find that it is then logical that the total EF&I costs will be greater in smaller sized cables. A closer look at the make up of Sprint's loadings can indicate the major contributors. Table 7(s)-2 shows a percentage breakdown of the components of the exempt and other material, engineering, placement, and overheads factor for each type of cable.

TABLE 7(s)-2: Eng., Plcg., EM., OH Components				
	Exempt &			
	(%)	(%)	(%)	(%)
Copper				
Aerial	12	20	31	37
Buried	22	33	NA	46
Underground	12	11	45	31
Fiber				
Aerial	9	15	40	36
Buried	19	33		48
Underground	8	10	47	35

Source: EXH 2, KWD-2, Volume III, Loop Workpaper 1, pp. 4-7.

As indicated above, the major portion of the exempt and other material, engineering, placement, and overhead factors are attributed to placement and overheads. It is intuitive that placement costs would comprise a significant portion of the loading factors. However, we are concerned with overheads contributing 31 percent to 46 percent of the total loading factor. Sprint represents that overheads are indirect support costs associated with activities that are not directly related to engineering or construction but are necessary components of construction. We are puzzled and surprised by the portion of Sprint's loading factors comprised of overhead costs; however, we are unable to discern the cause.

The Universal Service Order indicates that Sprint's total cable costs submitted in that proceeding included tax, labor overhead for placing and splicing, and engineering. We are unable to compare the factors used in the instant proceeding with those used in the Universal Service proceeding, as Sprint did not provide its loading factors in that proceeding. However, the Universal Service Order notes:

> Our analysis demonstrates that actual cable material cost as a percent of total cost for 26 gauge buried copper

> cable ranged from less than 9 percent for 12 pairs, to almost 64 percent for 4200 pair cable. As the proportion of actual material cost increased, then, of course, the proportion of loading factors decreases. This implies that some economies of scale for non-material costs exist as the size of cable increases.

See Order No. PSC-99-0068-FOF-TP at p. 154.

In this instant proceeding, Sprint's loading factors result in a similar result. Sprint's actual cable material cost as a percent of total cost for 26-gauge buried copper cable ranges from about 6 percent for 12 pairs, to 56 percent for a 4200-pair cable. Thus, some economies of scale for non-material costs exist as the size of cable increases. Additionally, splicing accounts for about 1 percent of the total EF&I costs for 12 pairs to about 33 percent for 4200 pair. Engineering, placement, exempt and other material, and overheads range from 92 percent of the total EF&I costs for a 12-pair cable to about 7 percent for a 4200-pair cable.

For comparison purposes only, BellSouth's material costs adopted by Order No. PSC-01-1181-FOF-TP for 26-gauge buried copper cable accounted for 14.6 percent of the total EF&I costs; loading factors for placement, including engineering and exempt materials, accounted for about 85 percent of total EF&I costs. See Order No. PSC-01-1181-FOF-TP at pp. 216-217. BellSouth's loading factors were linear in that the percent of total EF&I cost attributed to other materials and engineering were the same regardless of cable size. We found that linear loading factors will distort the cost relationships between rural and urban areas. See Order No. PSC-01-1181-FOF-TP at p. 305. As such, we ordered BellSouth to file revised cost studies which were to eliminate linear loadings.

We have reviewed Sprint's loading factors. While we are puzzled by the portion of Sprint's loading factors attributed to overhead costs, Sprint's overall total EF&I costs appear reasonable when compared to those adopted in the Universal Service Order and the Phase II BellSouth Order. Moreover, Sprint's factors do not cause significant distortions in the deaveraged cost results because the loading factors are not linear. Certain of BellSouth's and Verizon's loading factors were multipliers applied to material costs. On the other hand, Sprint's loadings are a constant dollar amount added to the per foot material cost of the cable. The BellSouth and Verizon models result in some loading costs that increase linearly with the size of the cable. Sprint's loadings do not. The percent of the loadings to the cable material cost increases as the size of the cable decreases. Larger sized cables are generally found in urban areas, smaller sized cables in more rural areas. Logically, the total percentage of loadings to total installed cost will be greater in smaller sized cables. In Sprint's case, the loadings represent a cost per foot for each type of cable rather than a cost that increases by cable size.

Sprint's splicing costs are developed on a per pair foot basis by dividing splicing expenses by the total number of pair feet placed. The cost is multiplied by the number of cable pairs to arrive at splicing cost for a given size of cable. For example, the splicing cost for aerial copper cable is $0.0056 per pair foot of cable. For a 100 pair cable then, the splicing cost is 100 pairs multiplied by $0.0056 per pair foot cost to yield $0.56 splicing cost per foot. In this way, splicing costs vary by the size of cable placed; the larger the cable size, the greater the splicing costs.

We find that Sprint's loading factors are accepted for purposes of establishing recurring UNE rates in this proceeding, subject to adjustments in other sections. Sprint's loading factors appear to be reasonable. Moreover, Sprint's application of its loading factors appear to be consistent with our preferred non-linear approach.

VII (t): EXPENSES

A. ARGUMENT

Sprint witness Dickerson explains that

> . . . forward-looking expense estimates in Sprint's UNE cost study process falls into four basic categories and/or processes: 1. The direct maintenance associated

> with capital investments underlying the various UNEs (e.g., buried copper cable maintenance, digital circuit equipment maintenance); 2. Other Direct Expenses associated with capital investments underlying UNEs (e.g., circuit engineering, cable pair record maintenance, trunk engineering); 3. Forward-looking common cost loadings; and 4. Expenses avoided when selling wholesale level UNEs vs. retail sales costs (e.g., billing and postage costs).

Witness Dickerson continues that direct maintenance expenses are a component of the Annual Charge Factor (ACF) loadings. He states that application of the direct maintenance loadings to forward-looking capital investment provides an estimate of forward-looking direct maintenance expense that is included in the UNE cost study. He explains that the direct maintenance expense component is derived by using 2000 ARMIS data from which the associated 6XXX plant-specific maintenance expense is divided by the associated 2XXX asset account to produce a percent or cents on the dollar relationship.

Witness Dickerson opines that "[i]n the UNE cost study process it is necessary to consider forward-looking direct expenses beyond the direct maintenance expenses described above." He explains that the Other Direct and Common (ODC) cost study "identifies the additional forward-looking direct expenses, such as traffic engineering or assignment functions, and develops loading relationships to the applicable UNE. . . . The forward-looking TELRIC UNE investments are used to develop the other direct expense loading percentages thus assuring a forward-looking level of expense estimate." He adds that common costs are also developed as a part of this process. He states that Sprint's Avoided Cost Study (ACS) removes certain avoided costs by expense category or subaccount. He contends that the use of the ACS process "assures that Sprint's UNE cost study results properly exclude retail expenses that can be avoided when selling UNEs on a wholesale basis."

Sprint pointed out in its brief that FDN took a position in its prehearing statement with regard to this issue. Sprint notes that FDN recommended at that time that:

> 'The Commission should require Sprint to derive forward-looking expenses through a 'bottom up' determination of the expenses needed to operate and support a forward-looking network. Sprint's maintenance expense component also does not properly reflect annual productivity increases.'

Sprint argues that:

> Not only does FDN fail to support its contention with any record testimony, its position is fundamentally flawed. Indeed, Sprint-Florida is unsure as to what FDN is referring to in its position on Issue 7(t).

We also have difficulty discerning what FDN meant in its prehearing statement. Witness Dickerson explains in deposition that there are "productivity gains inherent in these TELRIC cost modeling." [sic] He opines that

> Generally, the productivity increases are related to adopting and deploying [new] technology. But to the extent we already have experiences--some experiences deploying and operating those new technologies, and then we have exploded the use of those new technologies to our entire network, we have modeled the full productivity gains we're going to get out of using those new technologies.

Beyond witness Dickerson's statement in his deposition, there is no testimony on this issue. There is also no record evidence on what FDN meant by its prehearing statement. No party other than Sprint testified on or briefed expenses.

B. DECISION

Although no party took issue with any specific aspect of Sprint's expense cost study, this should not preclude examination of the expenses in any future proceeding that might arise. For purposes of this proceeding, we find it appropriate to accept Sprint-Florida's expense inputs.

<u>VII (u): COMMON COSTS</u>

A. ARGUMENT

The FCC's pricing rules specify that the forward-looking economic cost of an element equals the sum of the total element long-run incremental cost of the element and a reasonable allocation of forward-looking common costs. 47 C.F.R. 51.505(a). Additionally,

> [t]he sum of the allocation of forward-looking common costs for all elements and services shall equal the total forward-looking common costs, exclusive of retail costs, attributable to operating the incumbent LEC's total network, so as to provide all the elements and services offered.

47 C.F.R. 51.505(c)(2)(ii).

The Rule defines forward-looking common costs as "economic costs efficiently incurred in providing a group of elements or services (which may include all elements or services provided by the incumbent LEC) that cannot be attributed directly to individual elements or services." 47 C.F.R. 51.505(c)(1)

The FCC states in its <u>First Report and Order</u> that:

> Because the unbundled network elements correspond, to a great extent, to discrete network facilities, and have different operating characteristics, we expect that common costs should be smaller than the common costs associated with the long-run incremental cost of a

> service. We expect that many facility costs that may be common with respect to the individual services provided by the facilities can be directly attributed to the facilities when offered as unbundled network elements. Moreover, defining the network elements at a relatively high level of aggregation, as we have done, should also reduce the magnitude of the common costs. A properly conducted TELRIC methodology will attribute costs to specific elements to the greatest possible extent, which will reduce common costs. . . . [I]n the arbitration process, incumbent LECs shall have the burden to prove the specific nature and magnitude of these forward-looking common costs.
>
> We conclude that the forward-looking common costs shall be allocated among elements and services in a reasonable manner, consistent with the pro-competitive goals of the 1996 Act. One reasonable allocation method would be to allocate common costs using a fixed allocator, such as a percentage markup over the directly attributable forward-looking costs. We conclude that a second reasonable allocation method would allocate only a relatively small share of common costs to certain critical network elements, such as the local loop and collocation, that are most difficult for entrants to replicate promptly (*i.e.*, bottleneck facilities). Allocation of common costs on this basis ensures that the prices of network elements that are least likely to be subject to competition are not artificially inflated by a large allocation of common costs.

FCC 96-325 at ¶695, ¶696. [17]

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[17]First Report and Order, CC Docket No. 96-98; CC Docket 95-185, In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers, FCC Order 96-325 (released August 8, 1996) (First Report and Order).

Sprint witness Dickerson provides a minimal discussion of common costs in his testimony. He explains that the Other Direct and Common (ODC) cost study is used to develop common costs.

A single annual Common factor is identified for all categories of unbundled elements. Adding the Common factor to unbundled elements recognizes that common costs are a necessary component of the Total Economic cost for each unbundled element. Non-proprietary ODC Documentation) The process is described as follows:

> The ODC Module uses avoided expenses from the Avoided Cost Study and actual General Ledger investment and expense information and creates two types of factors. First are the Other Direct factors which are added to the direct costs determined in the ACF Module to create a total TELRIC Annual Charge Factor for each type of plant.
>
> The second factor is the Common Cost factor, which is added to the TELRIC cost to derive the total economic cost of the network element, which is also the price.

Beyond the discussion provided by Sprint, no testimony was provided on common costs, and no party opposed Sprint's position in their briefs.

B. DECISION

Sprint uses a common cost factor of 12.03%. We examined Sprint's model inputs, but did not identify any problem areas. Should this topic be explored in any future proceedings, parties should be free to raise any questions they believe are appropriate. However, for purposes of this proceeding, Sprint's common cost factor of 12.03% shall be accepted.

Further, we find that Sprint-Florida's expense inputs shall be accepted for purposes of this proceeding.

VII (v): OTHER

As pointed out in Sprint's brief, "no party to this proceeding provided a position on, or record evidence supporting, any 'other' inputs to the TELRIC study in response to issue 7(v)." FDN and KMC took no position on this issue. We find that all matters raised by the parties have been addressed in other issues. Accordingly, no action is needed with regard to this issue.

VIII (a), (b), and (e): NETWORK DESIGN; OSS DESIGN; AND MIX OF MANUAL VERSUS ELECTRONIC ACTIVITIES

This section addresses the appropriate assumptions and inputs to be used in forward-looking non-recurring UNE cost studies for network design, OSS design, and the mix of manual versus electronic activities, respectively. Much of the testimony overlapped or combined these issues; therefore, we find it beneficial to combine our analysis and consideration of these issues.

A. ARGUMENT

Sprint witness Davis contends that the study Sprint developed utilizes principles established by the FCC and this Commission. Sprint assumes a forward-looking network (as defined by the FCC) and the availability of a fully automated OSS for ordering UNEs. According to Sprint, its cost studies assume 100% automation for an ALEC to submit a service order to Sprint, including 100% flow-through for switch port and enhanced features. In other words, Sprint asserts that the network utilized in its model meets the FCC's criterion of being the most efficient, least-cost technology currently available. Sprint also assumes the use of Next Generation Digital Loop Carriers (NGDLCs) for unbundled loops. As part of its forward-looking network, Sprint witness Davis asserts that "[a]utomated facility assignment, order routing, switch activation and dispatch have also been assumed . . ."

According to witness Davis, "[t]he purpose of the NRC study is to determine the cost of initiating, changing and providing unbundled element service for ALEC customers." Sprint witness Davis defines non-recurring charges as "one time charges assessed for activities performed by Sprint on behalf of Alternative Local Exchange Carriers (ALECs) which involve the processing of orders and the installation of UNEs." Witness Davis states that Sprint's non-recurring charges

> . . . are based on the amount of time required to complete an activity and the cost of performing that activity. The charges represent the most current wage rates and time components related to UNE services.

Additionally, the NRC study consists of four main steps which appear to be more appropriately addressed in section(s) VII(c) and (d).

Sprint proposes that by assuming a forward-looking network, it has been able to develop charges "that relate as closely as possible to actual costs incurred . . ." Instead of developing a single average charge, the ALECs non-recurring charges will relate to work ". . . actually performed on their behalf." Sprint contends that this will ensure that non-recurring costs will neither be over, nor under-recovered.

As a result, Sprint has three general categories of functions which are reflected in the study. Those functions include, (1) service order charges; (2) installation charges; and (3) other installation charges. Sprint's testimony focused on service order charges, in which Sprint witness Davis asserts that service order charges are meant to cover ". . . the cost of work performed by Sprint in connection with receiving, recording and processing ALEC requests for service." Sprint witness Davis further categorizes these charges as a service order charge, a listing only charge, or a change order charge. The three charges are described below.

1) A ***Service Order Charge*** is applied to all orders for new service received from ALECs.

2) A ***Listing Only Charge*** is applied to orders received through the Local Service Request (LSR) process to provide directory listings only. (Note: Sprint also

provides a "batch" process that is generally used by ALECs for providing directory listings.)

3) A ***Change Order Charge*** is applied when an ALEC requests a change in a port feature. (emphasis in original)

When ordering service, Sprint has developed two general categories of service order charges. Those service order charges are described in detail below.

> ***Electronic Service Order Charges*** are applied to orders when an ALEC has elected to use Sprint's automated ordering platforms. In this case, it is assumed that a service order will directly flow into the Company's OSS on a fully automated basis. The majority of the costs, therefore, will result from the processing of orders that, due to errors in data provided on the ALEC's LSR, require some form of manual intervention to complete. Typically, this might include requesting service at an address that does not exist or is not complete (such as a missing apartment number). In addition, the LSR might not contain sufficient information to identify the existing service that is being transferred from Sprint to the ALEC. In all cases, Sprint will attempt to manually correct the information and may also contact the ALEC for clarification or correction.
>
> ***Manual Service Order Charges*** are applied when an order is not transmitted to Sprint through the automated OSS, such as when an order is placed over the telephone or by facsimile. (emphasis in original)

Sprint witness Davis argues that its development of electronic and manual service order charges is consistent with the utilization of a least-cost, forward-looking technology. Witness Davis states that,

> [i]n order to be considered forward looking, a technology must be currently available, most efficient and least cost. Sprint believes that the proposed Electronic/Manual

> service order structure best meets these criteria in a broad range of situations.

As noted in witness Davis' deposition, Sprint based its cost study ". . . on 85% flow-through without any intervention, intervention due to error correction, and 90% flow through without any work being necessary to properly identify the customer." Witness Davis states:

> [w]e have 15 percent that would require some manual intervention because of errors provided by the ALEC. We're showing another ten percent of the time we will have the possibility of not having -- it says here it's in use but it's not a Sprint customer or it's a customer to another CLEC. That's just a flat error in the identification of the customer.

Additionally, Sprint asserts that the flow-through is directly impacted by the quality of an order received from an ALEC.

Witness Davis declares that an automated service ordering interface requires an investment by both parties. Determining whether that investment is "most efficient" must take into account the financial impact to both parties. Witness Davis goes on to state, "ALECs presently use both methods [manual and electronic] to transmit orders to Sprint in Florida." Moreover, Sprint argues that since ALECs will use the platform they find the most economically advantageous, both manual and electronic ordering are forward-looking. In addition, Sprint witness Davis states,

> [a]s one might expect, the NRC for processing a manual service order is higher. This methodology facilitates changes that relate as closely as possible to actual non-recurring costs incurred, rather than developing a single "average" charge.

In conclusion, Sprint adds that no other party to this proceeding filed testimony regarding the issues addressed within the recommendation here.

Even though it filed no record evidence in this proceeding, FDN asserts in it post-hearing brief that the FCC provides for the recovery of those costs incurred in connection with "'a reconstructed local network [that] will employ the most efficient technology for the reasonably foreseeable capacity requirements'."[18] Both recurring and non-recurring charges for access to unbundled network elements must be "'developed from a forward looking economic cost methodology based on the most efficient technology deployed in the incumbent LEC's current wire center locations'." Id.

FDN argues that Sprint's NRC cost model fails to yield costs that would actually be incurred in a forward-looking TELRIC network. FDN asserts that Sprint's study is based "upon its existing embedded network, thus disregarding virtually all of the efficiencies otherwise associated with its purported least cost, most technologically efficient network." In support, FDN offers that Sprint can connect one of its customers to this network through electronic cross-connects made by the OSS. FDN asserts that this ability provides a substantial cost saving to Sprint. On the other hand, ALEC connections are accomplished thru manual cross-connections at the MDF. FDN states that these connections ". . . are labor intensive, costly and unnecessary in the forward-looking network." FDN goes on to assert that the network on which Sprint bases its NRCs utilizes the same ". . . backward-looking use of UDLC technology referenced in Issue 7(a)." Following the lead of the New York Public Service Commission, FDN proposes that there is no reason to use ". . . embedded UDLC in the cost model" and that Universal Digital Loop Carrier (UDLC) should be eliminated within one year.

FDN also points out what it considers to be flaws in Sprint's inputs and assumptions. Among those, FDN argues that Sprint's study assumes order flow through percentages and fallout percentages which are based on Sprint's actual experience. Additionally, FDN contends that Sprint's fallout percentage is substantially higher than what other commissions have found acceptable. FDN notes that the New York, Michigan, and Connecticut

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[18]Order FCC 96-325 at ¶685.

commissions have all limited fallout rates used in cost studies to 2%.

FDN alleges that Sprint's "excessive fallout rate" results from Sprint's alleged failure to use a forward-looking OSS. In support of its position, FDN offers that Sprint has admitted its OSS is only partially developed and that until an increase in demand is seen, no further development will take place. The additional manual intervention required results in higher costs to the ALECs.

FDN states that the excessive fallouts assumed in the model

> . . . are not consistent with state-of-the-art practices, ignore process improvement methods, and therefore overlook forward-looking cost savings potential. This failure to consider these technological advances in the model is a flaw because fundamental forward-looking assumptions are disregarded. The flow through rate associated with each task can have a significant impact on nonrecurring costs. It is extremely important, in the context of nonrecurring cost studies, that historical fallout rates be adjusted to reflect technological efficiencies and process improvements.

As such, FDN contends that Sprint has also failed to consider or fully account for efficiencies that would be gained from utilizing an enhanced OSS. By failing to account for this efficiency, FDN believes that Sprint has overstated the non-recurring costs associated with these orders. FDN states,

> [c]learly, in today's telecommunications environment, automation can be expected to displace much of the need for telecommunications technicians to handle orders manually. When orders "flow through" the system on an automated basis, significant cost savings can occur. A review of the findings in other jurisdictions reveals the existence of OSS technology platforms that have the potential of providing these cost efficiencies. These systems should be expected to increase system flow-

> through (decrease the need for manual intervention) and significantly decrease costs. OSS can only provide efficiency savings when used in conjunction with the associated connection process. In other words, if Sprint has access to these technology platforms, but is not reflecting the efficiencies of this technology in its nonrecurring cost model ("NRCM"), then the NRCM will overstate costs.

FDN asserts that Sprint's NRC study conjures up many of the same concerns addressed by this Commission in Phase A (BellSouth). FDN argues in its post-hearing brief that:

> [b]ecause Sprint's NRCM is largely dependent upon estimates obtained through the use of informal surveys of SMEs, it is critical that these data inputs can be relied upon to produce costs that are representative of forward-looking non-recurring costs in Florida. In other words, if the manner in which the rates were calculated and, if the inputs used in the calculation of the NRCs are not valid, then the resulting rates will not be valid. In particular, if the baseline times are inflated and reflect inefficient practices, the NRCs will be significantly overstated. The baseline should be reflective of an efficient provider's costs, and the forward-looking adjustment should be made to reflect additional efficiencies that will result from future technological advances.
>
> For a number of reasons, the informal surveys relied upon by Sprint in calculating its proposed NRCs are of dubious validity and thus call into question the evidentiary basis for those charges. The most problematic aspect of NRCM is the basis that Sprint uses to support its task times and occurrence factors. For the most part, Sprint has relied upon responses that have been completed by Sprint's subject matter experts to provide critical inputs to the NRCM.

For many NRCs, FDN asserts that there ". . . is a troublesome lack of support," offering that for some charges, Sprint was unable to provide any documentation. FDN states that,

> Sprint's reliance on SMEs to estimate activity times presents a problem in that it is difficult to quantify the subjective nature of the SMEs' opinions. Because the NRCM results are so closely tied to these SME opinions, the costs generated by the model are not reliable unless the responses are reliable and unbiased. Sprint does not, however, provide support to establish this. In fact, the weight of the evidence demonstrates that the survey results are unreliable and biased.
>
> Because SMEs knew their work was to be used in a UNE rate case, FDN contends that ". . . the opportunity for subjective bias was very high." In addition, FDN contends that the lack of uniform instructions and the manner in which SMEs were approached creates additional concern. Id. Furthermore,
>
> [t]he activities were based on standard Sprint practices so there was no effort to determine what forward looking, efficient practices would be. The Commission has held that the work activities designated need to be forward-looking, efficient, and consider potential process improvements.

Additionally, FDN contends that there was limited review of SME activity, stating that,

> [f]or some UNE categories in the study, such as high capacity loops and customized routing, only one SME was consulted. For numerous other UNE categories, such as analog loops, digital loops, loop conditioning, subloops, and transport, only two SMEs were consulted. Thus, numerous NRCs would rest on the subjective determinations of one or two SMEs.

FDN notes that this Commission made specific reductions to particular BellSouth inputs. FDN proposes that this Commission take a similar approach in this docket. Otherwise, this Commission could implement ". . . a general reduction across the board." FDN purports that this would be the same action taken by other commissions, stating:

> [t]he Maine PUC noted that "we like other state commissions will ameliorate the likely upward bias in the study by establishing rates below those proposed by Verizon." The Maine PUC ordered an overall 57% reduction in work times. Overall, the Maine PUC found that given all the errors in Verizon's NRCM, Verizon's NRCs should be reduced by a factor of 65%. The New Hampshire Public Service Commission also recently determined that "we are convinced that Bell Atlantic's NRC figures are too high because its survey samples are very small and subject to upward bias."

KMC witness Wood argues that this Commission should ". . . use its vast resources to comprehensively review the cost studies and set prices that will work." Witness Wood states,

> [i]t would be nice to be able to hire the experts necessary to analyze the ILEC UNE cost studies, but the money simply is not there. It's my understanding that while some of the other ALECs have retained outside experts to evaluate the Verizon cost study, that no one is undertaking the same effort for Sprint's cost study.

Witness Wood asserts that this Commission has the opportunity to control whether competition takes hold or whether customers remain monopolized. Additionally, witness Wood argues that UNE prices cannot be set at levels above retail rates. He contends that all assumptions undertaken as part of this evaluation should ". . . be made in favor of results that promote competition." In conclusion, witness Wood urges this Commission to ". . . conduct this needed evaluation and set new UNE rates that will help give customers a real competitive choice."

B. DECISION

We note at the outset that Sprint, FDN, and KMC addressed the issus being dealt with herein, albeit at varying levels. We also finds it necessary to note that FDN submitted no testimony and its arguments and allegations were primarily developed in its post-hearing brief, and not as part of the pre-brief record. FDN's discussion attempts to cast some doubt on the validity of Sprint's data inputs and assumptions, and ultimately on the non-recurring charges themselves. We have made every attempt to note where FDN's argument and position is based only on its brief.

Additionally, despite KMC witness Wood's general disagreement with the pricing proposals made by Sprint, witness Wood did not even review the underlying data or factual inputs related to the study. According to witness Wood, his review was limited to Sprint's recommended rates and their impact on KMC's operations. He suggests that there appears to be ". . . an incredible contradiction in that if you're supporting competition, that you would be proposing rates which would actually be above the retail service offered by - - in this case by Sprint which would in effect prevent anyone from being able to be a competitor." Finally, witness Wood urges this Commission to "use its vast resources," follow its mission statement, and promote competition in the state. Given his cursory review of the study and associated inputs, we find that limited weight shall be given to witness Wood's statements.

We agree with Sprint witness Davis that non-recurring charges should be based on ". . . one-time charges assessed for activities performed by Sprint on behalf of Alternative Local Exchange Carriers (ALECs) which involve the processing of orders and the installation of UNEs." We also agree with Sprint that "[t]he purpose of the NRC study is to determine the cost of initiating, changing and providing unbundled element service for ALEC customers." In concurrence with the FCC, and the parties in this proceeding, we find that NRCs should reflect the most efficient, least-cost technology currently available.

In addressing the assumptions and inputs related to network design in its post-hearing brief, FDN contends that Sprint's model is based upon its "backward-looking" embedded network. FDN believes that "embedded" UDLC should not be included in the study and states that this Commission should do away with UDLC within one (1) year. FDN also asserts that because other commissions have done so, this Commission should impose a similar requirement on Sprint. Conversely, Sprint contends that NGDLCs are the current standard and continue to be placed in Florida. As such, the non-recurring costs proposed by Sprint recognize the cost of implementing NGDLC. We note that even though the parties appear to use different terminology when discussing digital loop carrier, the parties actually appear to be discussing the same thing. Sprint witness Dickerson affirms this when asked about the difference between UDLC and NGDLC stating,

> I don't think it differs automatically at all. I think it's just meant to connotate the latest state of the art for a remote terminal digital loop carrier device.

Whichever term is used, Sprint appears to consider both UDLC and UDLC forward-looking technologies. We note that UDLC and NGDLC are addressed in additional detail in section VII(m).

We agree with Sprint that the FCC only requires a network to be "the most efficient, least-cost and reasonable technology **currently available. . .**" (emphasis added) We note that in the BellSouth phase of this proceeding, this Commission concluded ". . . non-recurring studies should be forward-looking reflecting efficient practices and systems, but this prospective should be tempered by considerations of what is reasonably achievable." Order No. PSC-01-1181-FOF-TP at p.332. We find that the network modeled by Sprint herein conforms to the FCC's requirements. Although we acknowledge that Sprint's model is not perfect, we find that it is forward-looking, and does "reflect" a network which is most efficient, least-cost, and currently available.

Sprint witness Davis contends that fully automated OSS means that a customer may enter his order directly and it would simply flow through, assuming that the order contains no errors. We believe that is unrealistic to assume that 100% of orders will be error-free 100% of the time. It is inevitable that errors at some level will occur in the process no matter what steps are taken. Again, even though Sprint assumes a fully automated OSS for order costing, Sprint is well aware of the fact that their OSS is not fully automated. Sprint witness Davis addresses process and productivity improvements, but states that these will not be further developed until the demand is there. Additionally, he references the "high cost" associated with developing these systems. When, and if, those improvements are made, witness Davis states ". . . it would reduce the amount of manual intervention or manual work needed for processing the order . . ." We anticipate that when such an improved system becomes available, there would also be a corresponding level of cost savings associated with those improvements. Even though improvements and enhancements have been contemplated by Sprint, we note that they have not been implemented.

According to Sprint's own testimony, its OSS is not fully developed and is being held until more demand is evident. We acknowledge that the only item of OSS that Sprint has currently deployed is a web-based online system for LSR entry called Integrated Request Entry System (IRES). IRES is available internally and to ALEC customers for submission of orders electronically. We note that for a three month period in 2001, 11.4% of ALEC orders were received by Sprint through manual methods, and 88.6% through electronic means. Of those electronically submitted orders, Sprint witness Davis contends that some 15% of ALEC orders ". . . require some manual intervention because of errors provided by the ALEC." He goes on to state that another 10% will produce an error while attempting to identify the customer. Despite the fact that Sprint's actual flow through rate is only 51%, we note that Sprint assumes a flow-through rate of 85% for purposes of the cost study. According to witness Davis, Sprint does not incorporate any costs associated with any error caused by a Sprint system issue into the NRC. Additionally, flow-through percentages are based on the orders themselves and not what is being provisioned. As such, flow-through percentages would be dependent on the information contained within an order, not on whether a particular order was for a two-wire analog loop or a DS3 loop.

FDN proposes that the fallout rate be reduced to 2%, but fails to address why that particular fallout rate should be applied to Sprint in Florida. In support, FDN offers the fact that other state commissions have done so in similar proceedings. Even though system upgrades would reduce the amount of manual intervention, FDN notes that fallout could be reduced if Sprint analyzed high fallout areas within its OSS and made process improvements. According to FDN, Sprint's failure to use ". . . root cause analysis and crafting process flow diagrams . . ." amounts to proof of Sprint's inefficient practices. FDN also addresses its concern that there is a lack of supporting documentation for Sprint's proposed NRCs. In fact, FDN offers that for some charges, Sprint was unable to provide any documentation at all.

Although we are also troubled by the apparent lack of supporting documentation in certain areas, we note that even Sprint witness Davis acknowledges the speculative nature of this endeavor. Witness Davis states,

> . . . we are making these assumptions for [this] cost study because we want to make this as unintrusive as possible. We -- our, our feeling is [that] we've been very conservative in terms of the number of times we anticipate seeing errors and how much flow-through we expect to see.

On balance, we find that Sprint's assumptions and inputs are generally reasonable, appear to adhere to the guidelines set by the FCC, and are consistent with previous orders of this Commission. Specifically, we find that Sprint's assumptions and inputs are correctly based on "the use of the most efficient telecommunications technology currently available" as specified in FCC rule 47 C.F.R. §51.505(b)(1). There is no requirement that Sprint, or any other ILEC, use some hypothetical, fully automated, near perfect OSS as FDN would have us believe.

Additionally, we agree with Sprint that its proposed assumptions and inputs are forward-looking, least-cost, and currently available. Even though the record lacks detailed information related to potential process improvement and system enhancements, we find that Sprint has made efforts to include them in its study. We note that Sprint addressed several of these improvements (albeit briefly) in response to our staff's discovery, stating,

> These process improvements are generally intended to better handle ordering of unbundled network elements. For example, the Integrated Request Entry System (IRES) automation of UNE-P orders to flow-through to the Service Order Entry (SOE) system and the Carrier Access Service System (CASS) is planned for 2002.

Sprint seems poised to implement additional improvements as demand increases, and as it becomes more economically feasible for all parties.

We find that the appropriate assumptions and inputs to be used in the forward-looking non-recurring UNE studies for determining network design, OSS design, and the mix of manual versus electronic activities are those set forth by Sprint. These assumptions and inputs shall be used in conjunction with the changes in all other applicable issues. In addition, these assumptions and inputs shall be tempered by considerations of what is reasonably achievable.

VIII (c): LABOR RATES

A. ARGUMENT

In an interrogatory response Sprint defined loaded labor rate as "the total direct costs associated with one hour of labor for a specific job/position or work group. Specific rates are calculated for technicians, engineers, network planners, line workers, cable splicers, and other positions necessary to the provisioning and maintenance of Sprint's network." Sprint goes on to say that "[l]oaded labor rates are based on financial and operational data for the calender year 2000. Productive hours are divided into wage and overhead costs to arrive at an hourly loaded labor rate."

Interrogatory responses also indicate that travel time and various vehicle costs are associated with the loaded labor rates.

Sprint witness Dickerson testifies that labor rates include a contribution to common costs. In its cost model documentation and testimony, Sprint provides the following examples of common costs: furniture, office equipment, general purpose computers, and corporate operations. In its Non-Recurring Cost Model, Sprint provided a chart showing the loaded labor rates with and without a common cost percentage of 12.03 percent.

B. DECISION

In the BellSouth phase of this proceeding (Docket No. 990649A-TP), BellSouth did not include shared costs in its proposed labor rates, which were subsequently approved by this Commission. Order No. PSC-01-1181-FOF-TP at pp. 333-335. BellSouth's reasoning for not including these costs in its labor rates was that in Docket Nos. 960833-TP, 960846-TP, and 960916-TP, this Commission eliminated them from non-recurring rates in Order No. PSC-96-1579-FOF-TP. In Order No. PSC-96-1579-FOF-TP, issued December 31, 1996, the shared cost component of labor rates is not mentioned; however, Order No. PSC-98-0604-FOF-TP, in Dockets Nos. 960757-TP, 960833-TP, and 960846-TP, contains the following concerning the inclusion of shared costs in labor rates:

> [W]e find it appropriate for shared costs to be reflected by means of the shared cost factors. These costs shall not be associated with labor rates. This does not prohibit BellSouth from recovering these costs. It merely shifts the recovery of these costs from non-recurring rates to recurring rates.

Order No. PSC-98-0604-FOF-TP, issued April 29, 1998, in Docket Nos. 960757, TP, 960833-TP and 960846-TP at p. 71.

In Order No. PSC-98-0604-FOF-TP, some examples of shared costs are ". . .human resources, office equipment, land and building space, and motor vehicles. . .." Order No. PSC-98-0604-FOF-TP at p. 69. The Order continues by saying that this Commission was ". . .

unable to verify what portion of non-recurring costs should be included and whether all of the recurring expenses are excluded." Further, the Order states:

> Based on the evidence, it appears that such recovery through non-recurring charges could create a barrier to entry. We do, however, recognize that this may not always be the case. Nevertheless, we believe that CLECs who face high non-recurring charges that must be paid to attract each new customer may be reluctant to enter the telecommunications market in Florida for that reason.

Id. at p. 71.

We would agree that high non-recurring charges can serve as a barrier to entry for competitive carriers. We also agree that nothing should preclude Sprint from recovering its common costs. While higher non-recurring charges may serve as a barrier to entry for competitive carriers, there is difficulty in determining which common costs should be included or excluded from non-recurring costs. In addition, there is difficulty in determining whether or not an adjustment would allow Sprint to recover 100 percent of its common costs.

Sprint is the only party that takes a position on this issue. Based on the limited record on this issue and the difficulty in separating out common costs, we find that the appropriate assumptions and inputs for labor rates to be used in the forward-looking non-recurring UNE cost studies shall be the labor rates proposed by Sprint.

VIII (d): REQUIRED ACTIVITIES

A. ARGUMENT

According to Sprint witness Davis, Sprint assumed the use of Next Generation Digital Loop Carriers (NGDLCs) in the development of Non-Recurring Charges (NRCs) for unbundled loops and assumed the availability of a "fully automated" Operations Support System (OSS) for an ALEC to submit Local Service Requests (LSRs) to the Company.

Witness Davis states that the NRC study consists of four main steps:

1. Identifying the work activities or tasks necessary to complete service order, installation, and other related provisioning functions for each unbundled element.
2. Identifying the work times related to performing each function.
3. Identifying the labor rates for each work group that completes the activity and multiplying that amount by the time required to complete the activity.
4. Grouping the costs by appropriate activities to develop a cost by unbundled network element.

Witness Davis lists three general categories of functions reflected in the study of non-recurring charges:

1. Service Order Charges.
2. Installation Charges.
3. Other Installation Charges.

Sprint has developed three categories of Service Order Charges which, besides Service Order Charges, include a Listing Only Charge and a Change Order Charge. A Listing Only Charge is for directory listings only and a Change Order Charge is applied when an ALEC requests a change in a port feature.

Sprint witness Davis states that the NRC study includes an Electronic Service Order Charge and a Manual Service Order Charge. Electronic Service Order Charges are applied to orders when an ALEC has elected to use Sprint's automated ordering platforms. Sprint utilizes the Integrated Request Entry System (IRES), a web-based online system for the entry of Local Service Requests (LSRs) by both internal and external customers. IRES utilizes the order generation logic from the Sprint Intelligent Computing Environment (SPICE) to create the service order in the Service Order Entry (SOE) system. According to witness Davis, the majority of the costs for electronic orders results from the processing of orders that, due to errors in the data provided on the ALEC's Local Service Request (LSR), require some form of manual intervention to complete. Sprint's NRC study is based on 85% of electronic orders flowing through without manual intervention and 90% flowing through without any work necessary to properly identify the customer.

Witness Davis states that Manual Service Order Charges are applied when an order is not transmitted to Sprint through the automated Operation Support System (OSS), such as when an order is placed over the telephone or by facsimile. The manual service order charge recovers the cost of a Local Service Request (LSR). Work functions are weighted by frequency of occurrence to determine the composite cost. The Manual Service Order Charge includes the cost to:

- Clarify and correct errors on the LSR
- Establish major account for a Competitive Local Exchange Company (CLEC) in the Carrier Access Support System (CASS) or customer records and billing system (CRB).
- Enter order in the service order entry system (SOE)
- Apply service and equipment codes.
- Determine whether a CLEC order is for a second line or for a transfer of service from one CLEC to another.
- Complete billing service order and notify CLEC of completion.

Electronic Service Orders can include costs for:

- Clarify and correct errors on the LSR.
- Set up major account for new CLEC.
- Set up major account for an existing CLEC.
- Investigate working service cause, i.e. number in use and not a Sprint customer.

Sprint's NRC study states that a Local Number Portability (LNP) charge recovers the cost of porting an existing customer to a CLEC when the customer requests service from a new service provider and desires retention of a current telephone number.

Witness Davis also testifies that the Installation Charge section of Sprint's NRC cost study is subcategorized into charges for 13 different UNE types, including loops, preorder loop qualification, loop conditioning, dark fiber, UNE-P, EELs, switching, features, customized routing, operator services and transport. Sprint's NRC study states that Sprint assumes fully automated processes for assignment, switch activation, order routing and dispatching of UNE orders, and although current flow-through is not 100%, Sprint states that it has assumed no manual intervention costs for these activities when automatic flow-through does not occur.

Sprint's witness Davis proposes two possible installation charges for the loop subcategory of nonrecurring charges: New Install, and Re-install or Migrate. New install covers the cost of installing an unbundled loop for an ALEC's end user who is not an existing customer of Sprint. The charge will also apply to a loop where there is no existing "Cut Through" or "Dedicated Central Office Plant" in place. If there is no "Cut Through" it means that one or more field connections have to be made at a serving area interface or on a mainframe. The new install charge includes the cost of:

- Connections at cross-boxes, terminals and customer interface
- Travel to the beginning of the job.
- Installation of the NID.
- Pro-rated NGDLC remote activation.
- Placing and testing a Main Distribution Frame (MDF) Jumper.

Re-install or migrate recovers the cost of installing an unbundled loop when an existing Sprint end user is migrating to an ALEC, or when there is an existing "Cut Through" or Dedicated Central Office Plant" in place. Re-install includes the cost of:

- Completion testing (cut-through, dedicated and vacant).
- Pro-rated NGDLC remote activation.
- Placing and testing an MDF Jumper.
- Connections at cross-boxes.

Sprint also has Non-recurring charges that are categorized as "Other," which include:

1. Originating Point Code (OPC) service. OPCs are generated to allow Sprint's Signaling System 7 (SS7) network to identify the originating point of

a call. These charges are billed per each requirement.

2. Global Title Transactions (GTT) charges apply for each service or application that utilizes transaction capabilities. This charge is for each GTT service request.
3. Network Interface Device (NID) installation is charged when a NID is installed.
4. Digital Loop Qualification Information Request.
5. Digital Data Loop Cooperative Testing.
6. Trouble Isolation charge, which is billed when a CLEC reports trouble on a facility and the trouble was not on Sprint's network.
7. The trip charge, which recovers the cost of an Installation and Repair technician's trip to perform work at the request of a CLEC.
8. Dark fiber end-to-end testing, which covers the cost to test dark fiber from end-to-end.
9. Tag and label service.
10. Non 10-digit trigger.
11. Coordinated Conversion - after hours.

FDN believes that Sprint's reliance on SMEs to estimate activity times presents a problem in that it is difficult to quantify the subjective nature of the SMEs' opinions. FDN states in its brief that because the NRC model results are so closely tied to these SME opinions, the costs generated by the model are not reliable unless the responses are reliable and unbiased. FDN believes the weight of the evidence demonstrates that the survey results are unreliable and biased. It should be noted that FDN did not sponsor a witness and therefore no testimony was filed by FDN.

In their brief FDN points out that the BellSouth UNE order listed the following concerns regarding BellSouth's NRC cost studies:

- "As described previously, in some instances the SMEs had actually performed the work themselves, in others the SMEs had not. Time estimates were typically provided by the SMES to the cost group verbally but sometimes were provided via e-mail. Apparently SMEs had the option of reviewing their inputs after the inputs had been placed into the cost study. We are troubled by the lack of a paper trail with regards to

SME inputs. It makes it extremely difficult for us and the ALECs to analyze BellSouth's cost studies.";

- "Were the SMEs given instruction on how to proceed? It is difficult to tell, because different SMEs reported different approaches in determining the work activities and work times.";
- "BellSouth's SMEs did what they were told to do; that is, they developed or reviewed work activities and times based on their knowledge, experience, and observations. However, we believe that there is a higher standard that these cost studies must presumably meet. According to her testimony, BellSouth witness Caldwell apparently agrees, because she asserts that the same network designed for recurring costs should also be used for nonrecurring costs: 'forward-looking, reflect improvements, and should be attainable.'";
- "Were the SMEs told that this was to be a forward-looking study? If they were, it is not readily apparent from the depositions; the SMEs typically referred to the work as it is done today.";
- "Should BellSouth have performed time and motion studies for nonrecurring activities? We believe the answer is "perhaps," because time and motion studies imply that the activities to be studied are already known and agreed upon and that the parties are comfortable with BellSouth performing the time and motion studies.";
- "Was BellSouth's methodology for determining required work activities and times forward-looking? BellSouth apparently used the work activities and times in place based on the information available to the current SME. Neither BellSouth witnesses nor BellSouth SMEs testified to any directive given to the SMEs of how a forward-looking study should be done."

BellSouth UNE Order at pp.392-393. FDN believes that Sprint's NRC study raises most of these same concerns. FDN contends that there was no uniformity in the manner in which the SMEs were approached. Some information was taken over the phone, some information was elicited through meetings.

FDN states that the activities identified by Sprint for the NRC study were based on standard Sprint practices, so there was no effort to determine what forward-looking, efficient practices would be. FDN points out that numerous NRCs would rest on the subjective determination of one or two SMEs, and that the SMEs knew their responses would be used for UNE costing so the opportunity for subjective bias was very high. FDN alleges that, as with the designation of the work activities, there was no independent third-party review of the work times.

FDN cites the BellSouth UNE order that addresses its NRC study and states:

> We share the Massachusetts Department of Telecommunications and Energy's (MDTE) concerns that the reliability of cost studies can be impaired if employees are not instructed to assume a forward-looking perspective. We also believe that it is completely natural for some bias to be introduced into a study where employees provide work times for activities that they know will be performed for a competitor. Similarly, we believe that BellSouth's nonrecurring cost study methodology may have flaws, and that any such flaws are likely to create an upward bias in resulting numbers.

FDN believes this Commission should make specific reductions or implement a general reduction across the board similar to what other commissions have done.

B. DECISION

1. Work Activities

Sprint consulted Subject Matter Experts (SMEs) with representation from each discipline and department, and identified the required steps or work activities for each UNE NRC.

2. Average Time Per Work Function And Other Studies

Average Time Per Work Function studies were used to determine the time spent on certain activities identified in Sprint's NRC study. Four components that were used in several NRC UNEs in the study were Trip, Outside Plant Completion Testing, NID installation, and NID connections. The work times for these components were derived from observations associated with an Average Time Per Work Function conducted by Sprint Local's Customer Service Organization (CSO) in the fall of 2000. These four components are used in several of the UNE NRCs, including 2-Wire and 4-Wire Analog Loop, 2-Wire and 4-Wire xDSL-Capable Loops, 2-Wire and 4-Wire Digital Loops, DS1 Service, 2-Wire and 4-Wire Sub Loop Distribution, and Other Charges Trip and NID.

The isolation test time is an input to the Trouble Isolation Charge and was derived from observations associated with an Average Time Per Work Function Study conducted by Sprint Local's Customer Services Organization in the fall of 2000.

A time study was conducted to determine the average engineering time required to develop the work documents needed to remove load coils and to update Sprint's network records to reflect the removal of load coils. The study was conducted to determine engineering work times for support of loop conditioning for xDSL services. The average time to complete the steps taken by the engineering representative on the Engineering Work Order (EWO) System was 29 minutes. An additional 15 minutes per order was added to cover miscellaneous clerical support.

Average engineering time to unload a cable pair was determined by Sprint using the average of engineering times for 6 jobs gathered in August of 1999. This time is used in the Loop conditioning study along with 15 minutes of clerical support.

Average times for the research cost and the administration cost for a Dark Fiber Quote Preparation Fee were determined using the average of engineering and field service management time for 12 dark fiber requests. These times were accumulated in the spring through early summer of 2001.

The times for Carrier Access Support System (CASS) In Orders for EEL Loop and Transport Migration Work was derived by a carrier service center logging of orders processed in a 9 hour day. This information was provided verbally. The times for CASS Out Orders for EEL Loop and Transport Migration Work were derived by a carrier service center logging of orders entered and the amount of time to process. This information was provided via email.

The times for non 10-digit trigger coordination and translations time used in non 10-digit Trigger Charge for Local Number Portability (LNP) were compiled from a Sprint study the week of March 5-16, 2001.

While Average Time Per Work Function studies were used to determine the average times for certain tasks, the documentation simply listed the times observed for each occurrence. Witness Davis explains the documentation provided in support of the studies in this way:

> . . . if you're looking at the observed times for completion test, the important piece of information is that fourth column that's entitled "Completion Testing."
>
> What happened on these observations, this was a very large project that the customer services organization did. It was an event that involved a couple of hundred technicians and 100 observers and they went out and observed a lot of things: safety, you name it. And along with these observations, they observed technicians performing completion tests, they observed technicians installing NIDs, connecting ground wires, and they had sheets that they recorded information on. And then it was brought back in and all the, the observed times were put into a database, and what you see here is a data dump of all the completion test observations made.

The relevant times used in the study for completion test, travel time, isolation test time, NID placement, grounding the NID, and reconnection in the NID are subsumed in the total task times included in the documentation provided. The total task beginning and ending times are reported in the study but the actual times used in calculating the average times per activity are simply based on a reported number with no corresponding beginning and ending times. Average times were calculated by dividing the sum of the observed times by the number of occurrences. We are concerned with the accuracy of the studies, because of errors in the task times reported based on the task time starting and ending times. For instance, the first line that we reviewed for completion testing showed a task start time of 10:16 and a task end time of 11:27 which should be a total of 71 minutes but the study reports 111 minutes. Below is Table 8d-1 showing the times discussed above reported as part of Sprint's study:

TABLE 8(d)-1				
Tech ID	Task Time - Start	Task Time - End	Task Time - Total	Completion Testing
7113	10:16	11:27	111	3

Source: EXH 10, p. 150

The completion testing time of 3 minutes is provided by the SME with no beginning or ending times or other documentation.

We discovered several occurrences where the total task time was miscalculated or in the case of TECH ID 21124 no beginning or ending times for observed travel time were reported at all, even though a corresponding study time was reported as shown in the Table 8d-2 below:

TABLE 8(d)-2				
Tech ID	Task Time - Start	Task Time - End	Task Time - Total	Travel Time
21124	00:00	00:00	0.00	5
21124	00:00	00:00	0.00	8
21124	00:00	00:00	0.00	8
21124	00:00	00:00	0.00	12
21124	00:00	00:00	0.00	12
21124	00:00	00:00	0.00	13
21124	00:00	00:00	0.00	15

Source: EXH 10, pp. 162-163

Witness Davis acknowledged that the task times could be off due to input errors of either the beginning or the ending time. Though witness Davis states that the important piece of information is in the fourth column (entitled "Completion Testing" or "Travel Time" in the examples above), we believe it may be that errors have also occurred in recording these times by the observer, but we have no way to be sure since the beginning and ending times for this column were not provided.

3. Subject Matter Experts (SMEs)

Similar to BellSouth's non-recurring cost studies, Sprint determined work activities, work times, and probabilities of occurrence for its nonrecurring cost studies using SMEs.

Sprint consulted SMEs with representation from each discipline and department and with varying work experience for each UNE category. Several of the UNE NRCs were developed using input only from SMEs. In response to a request for Sprint to provide documents backing up percentage occurrences for various functions required in manual and electronic service order charges, the company responded that such documents did not exist. Sprint responded that a team of SMEs in service order receipt and validation identified the steps, the percentage of occurrences for the work steps involved, and the amount of time needed for each step. Sprint referred to its response to our staff's POD 19, which stated that it did not provide any documentation for UNE NRC categories "Service Order-Listing Only Manual and Electronic" and "Service Order-Change Order Manual and Electronic." Sprint did not provide support for many of the SME activity time estimates and probabilities included in their study.

SME input was also used exclusively for the following NRC UNEs:

- Service Order - LNP
- Installation Charges - High Capacity Loops - DS3, OC3, OC12, and OC48
- Installation Charges - Dark Fiber Loop
- Installation Charges - Local Switch - Customized Routing
- Centrex Features - Feature Packages
- ISDN Features - Feature Packages
- Installation Charges - Dark Fiber Transport
- Installation Charges - Digital Data Loop Cooperative Testing
- Installation Charges - Dark Fiber Testing (EXH 10, pp.121-140)

For many of the remaining UNE NRCs, SMEs provide the inputs for several of the activities that are not determined by Average Time Per Work Function Studies or other studies, and also provided the probability percentages that the activities occur.

Sprint relied heavily on SMEs' input to determine the work activities, times, and probabilities for nonrecurring cost elements. Witness Davis states that a lot of this (NRC study) is speculative in terms of this whole process is fairly young. Witness Davis was not sure of the process the SMEs used in determining the times and percentages for manual and electronic orders and when the times and percentages were determined since he has only been in the group since last June. Sprint did not provide documentation for many of the NRC elements that are listed in its study. For example, for the various service order types there is no documentation supporting the SME inputs. A majority of the other NRC costs are determined using a combination of Average Time Per Work Function studies and SME input or SME input only.

The inputs provided by the SMEs are not subject to independent verification. The inputs from SMEs basically represent the company's best judgement on the times that are used to determine a non-recurring cost. Sprint did not use a third party consultant in determining the activities identified in the NRC study. There is a lack of uniformity on how information was gathered from the SMEs and the instructions that were given to the SMEs. The SMEs often provided their estimates based on what they observed and not on what forward-looking, efficient practices would produce. We find that it is only natural that the SMEs, being aware of what the NRC study is used for, would tend to bias their inputs in favor of higher NRC costs.

We struggled with how best to evaluate the work times included in Sprint's non-recurring activity times and corresponding charges due to the fact that no parties filed testimony on this issue. We compared Sprint's rates with BellSouth's rates approved in Order No. PSC 01-2051-FOF-TP to determine the reasonableness of Sprint's proposed Non-recurring charges. Generally, we believe Sprint's NRC rates are within a range of reasonableness compared to the BellSouth rates as approved in Order No. PSC-01-2051-FOF-TL. Witness Davis states in his direct testimony that in most cases the work times that were ordered for BellSouth are higher than the work times reflected in Sprint's filed NRC study. We note that comparing NRC rates between companies can some times be problematic. For example, for a two-wire analog loop, first or new line, Sprint is proposing a rate of $119.74. BellSouth has an approved NRC rate of $49.57, based on Appendix A of Order No. PSC-01-2051-FOF-TP, for service level 1 and a NRC rate of $135.75 for service level 2 for a two-wire analog loop. Service level two includes certain engineering costs such as a design layout record. After reviewing Sprint's NRC study, it is not clear to us whether Sprint's $119.74 NRC charge is comparable to BellSouth's service level 1 or 2 for two-wire analog service. On balance, we find that Sprint's NRC activity times and resulting NRC rates are within a range of reasonableness and find that those rates shall be adopted as filed.

We find that the NRC minutes per NRC element and resulting NRC charges be accepted for Sprint as filed. Though there are weaknesses in Sprint's NRC study, including a lack of supporting documentation for the study, errors in Sprint's Average Time Per Work Function Study, and the subjectivity of the SMEs' time and probability estimates, there has been no other evidence filed by parties, other than FDN's brief. Sprint's NRC rates fall within a range of reasonableness based on a comparison with BellSouth's approved NRC rates.

VIII(f): OTHER

The issue before this Commission is to determine the appropriate assumptions and inputs for any other items that are to be used in the forward-looking non-recurring UNE cost studies.

A. ARGUMENT

Sprint witness Davis states that "[t]he purpose of [his] testimony is to support the Sprint-Florida, Inc. (Sprint) 'Non-Recurring Charge (NRC) Study' and to explain the assumptions made and principles utilized in development of the NRCs associated with ordering and installing Unbundled Network Elements (UNEs)." He goes on to state, "[d]ue to the quantity of NRCs involved with this proceeding, I will only address the categories and/or particular items that warrant discussion due to the complexity of the subject and/or costing methodology." Witness Davis also asserts that his testimony "addresses in whole, issues #8, #10 and #11 . . ." (emphasis added) Witness Davis never addresses Issue 8(f) in his testimony, and the record regarding 8(f) is non-existent. Furthermore, Sprint states that "[n]either Sprint-Florida, nor any other party identified any 'other' inputs to the recurring cost study."

Although no testimony directly related to this issue is presented, FDN provides a lengthy discussion on the validity of certain inputs and the resulting rates in its post-hearing brief. FDN also proposes and offers support for reducing the NRCs which were based on Sprint's figures. Throughout these discussions, however, no specific reference to other inputs was ever made.

B. DECISION

We agree with Sprint that neither Sprint nor any other party has proposed any "other" inputs for consideration.

Furthermore, we find that the arguments raised by FDN in its post-hearing brief have been addressed in other sections, specifically in sections VIII(d) and VIII(e). In support, we note that FDN's discussion in its post-hearing brief appears to be proffered in support of its positions in Issues 8(d) and 8(e), not 8(f). FDN only raises concerns relating to work times, observations, and subject matter experts (SMEs). As such, we find that each of these concerns has been discussed as they relate to the proper inputs and assumptions associated with specific issues, and need not be addressed again here.

All matters raised by the parties have been addressed in other issues. Accordingly, no action is needed with regard to this issue.

IX(a): APPROPRIATE RECURRING RATES (AVERAGED OR DEAVERAGED AS THE CASE MAY BE) AND NON-RECURRING CHARGES FOR CERTAIN UNES

Recurring and non-recurring rates are contained in Appendix A. The rates reflect re-running the appropriate cost model(s) to incorporate our inputs, and then re-running the Sprint TELRIC UNE Model to yield our rates. The rates in Appendix A also reflect, where applicable, the specific rate design made in certain other sections (e.g., our deaveraging findings).

IX(b): UNBUNDLING, COMBINING, AND PRICING OTHER UNES

A. ARGUMENT

Sprint witness Hunsucker states that in its Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in CC

Docket No. 96-98, released December 9, 1999, the FCC added to its list of UNEs, the requirement for incumbent LECs to unbundle the high frequency portion of the loop spectrum, an arrangement commonly referred to as "line sharing." It is Sprint's understanding that this Commission will initiate a separate proceeding to determine rates for this UNE. Also, the FCC has defined Operational Support Systems (OSS) as an unbundled network element. The rates for OSS cost recovery are to be addressed in a separate proceeding, and are not included in this filing. Witness Hunsucker believes that there are no other UNEs that the Commission should require ILECs to unbundle in this proceeding.

FDN believes this Commission should take notice of the U.S. Supreme Court's decision in Verizon Communications, Inc. et al. v. Federal Communications Commission, et al., 152 L. Ed. 2d 701, 122 S. Ct. 1646 (2002) that, among other things, validates the rights of ALECs to obtain combinations of unbundled network elements. The Supreme Court in Verizon determined that the Eighth Circuit erred in invalidating the FCC's additional combination rules, Rules 51.315(c)-(f). FDN states that "Rules 51.315(e) and (f) place the burden on an ILEC seeking to deny a requested combination to demonstrate that the combination is not technically feasible or would impair the ability of other carriers to obtain access to unbundled network elements or to interconnect with the incumbent LEC's network." FDN states that:

> The record in this case reveals that Sprint does not (1) offer a product whereby ALEC UNE-L or UNE-P voice service may be offered over the same line as Sprint high-speed data service or (2) generally offer to ALEC's packet switching as a UNE. . . . In the BellSouth phase of this case, AT&T and MCI proposed the Commission investigate creating a new broadband UNE. Accordingly, if the Commission does initiate such an investigation, FDN believes all Florida ILECs should be included in this review.

B. DECISION

We recognize that this Commission is bound by the terms of the Supreme Court's decision in Verizon vs. FCC, but we do not believe any specific actions are required at this time. Other than line sharing and OSS, no other elements or combinations have been identified in this proceeding such that we should require Sprint to unbundle them. Line sharing and OSS are specifically excluded from consideration in this proceeding because of the stipulation that Sprint and the parties signed. There in no evidence in the record supporting any impairment analysis regarding UNE-L or UNE-P voice service being offered over Sprint high speed data service or packet switching as a UNE.

Therefore, we require no other elements or combinations of elements be unbundled by ILECs at this time.

X: RATE FOR CUSTOMIZED ROUTING

The issue before this Commission is to determine the appropriate rates, if any, for customized routing. We note that Sprint was the only party to testify on this issue.

A. ARGUMENT

According to Sprint's NRC Cost Study, Sprint defines customized routing as:

> Customized routing permits requesting carriers to designate the particular outgoing trunks that will carry certain classes of traffic originating from the CLEC's customers. This permits the carrier to self-provide, or select among other providers of interoffice facilities, operator assistance (OA) services and directory assistance (DA). Customized routing is generally technically feasible, but varies from switch to switch based on capacity constraints.

Sprint witness Davis proposes three separate non-recurring charges for customized routing. The non-recurring charges that witness Davis identifies are: (1) the switch analysis charge, (2) host switch translations, and (3) remote switch translations. Sprint's NRC Cost Study defines those as:

> **Switch Analysis Charge**
> A switch analysis procedure to determine OA/DA branding capacity in a switch. The applicant is responsible for these charges whether capacity does or does not exist in the analyzed switch. This charge will also apply to

remote switches should the applicant request a different dialing plan in the remote than exists in the host switch. This charge includes the costs of:

- Translation engineering cost.

Host Switch Translations Charge
Charge for installing translations in the host switch that will direct OA/DA originating traffic from the switch to a dedicated trunk designated by the applicant. The charge includes the costs of:

- Translation engineering cost.

Remote Switch Translations Charge
Charge for installing translations in a remote switch if separate dialing plans are required from those in the host switch. This charge includes the costs of:

- Translation engineering cost.

Sprint has proposed rates for the three customized routing charges identified and described above. Sprint's proposed NRCs for these charges are:

- switch analysis, $119.74
- host switch translations, $2,394.81
- remote switch translations, $1,796.10

Describing those charges during his deposition, witness Davis states:

> . . . host switch translation and remote switch translations, your host switch is a larger office that has more feature support. Remote switches are connected to these host switches in terms of what we call a switching hierarchy.
>
> A call may originate on, what we call the field side of the remote switch, travel to the remote switch, go up to the host switch, leave the host switch and go beyond. The point is that the host switch is more complicated, has

> more stuff going on, has more activity in terms of supporting features and that sort of thing.

Witness Davis contends that switch analysis, and the corresponding charge, is based on research performed by translation engineers ". . . to see if something can be done." The charge is comprised of ". . . time that's spent by a translations engineer priced out against the labor for that translations engineer."

Witness Davis states that customized routing has been requested, stating "[w]e have been working with a customer in Nevada." However, it has not been requested in Florida. He goes on to state that customized routing ". . . could be anything." Witness Davis states,

> I mean, the case, in the case of Nevada, we're talking about operator services. But it could be something else.

When and if a party requests customized routing, witness Davis contends that the party ". . . would contact our business and wholesale marketing group and work through a product manager." According to witness Davis, "[o]nly those charges applicable to a specific customized routing request would apply."

B. DECISION

We note that the record relating to this issue is limited. The only party to file testimony on this particular issue was Sprint. As such, we agree with Sprint's statement in its post-hearing brief which states "Sprint-Florida's Position and record evidence on Issue 10 is unopposed by any other party."

Based on the record, we find that rates and charges applicable to a request for customized routing should be determined based on ". . . a specific customized routing request." Such requests should utilize the processes and rates outlined above and as described in Sprint's NRC Cost Study. As such, we see no benefit in determining a set of "generic" rates for all possible customized routing combinations at this point, especially given the fact that customized routing appears to be so infrequently requested and the charges could vary depending on the nature of the request. We agree with witness Davis that, "[o]nly those charges applicable to a specific customized routing request would apply."

Although we find that additional charges may result from a customized routing request, it is impossible to know what charges might apply without an actual request. As such, we find that the customized routing rates proposed by Sprint are appropriate.

We find that the customized routing rates proposed by Sprint are appropriate.

XI (a): LINE CONDITIONING RATE AND APPLICATION

Paragraph 172 of the FCC's UNE Remand Order states:

> We clarify that incumbent LECs are required to condition loops so as to allow requesting carriers to offer advanced services. The terms "conditioned," "clean copper," "xDSL-capable" and "basic" loops all describe copper loops from which bridge taps, low-pass filters, range extenders, and similar devices have been removed. Incumbent LECs add these devices to the basic copper loop to gain architectural flexibility and improve voice transmission capability. Such devices, however, diminish the loop's capability to deliver advanced services, and thus preclude the requesting carrier from gaining full use of the loop's capabilities. Loop conditioning requires the incumbent LEC to remove these devices, paring down the loop to its basic form.

Line conditioning or loop conditioning is the process that may be used in conjunction with loop qualification[19] for provisioning an xDSL-capable loop, line sharing or a digital loop. According to Sprint witness Davis, after receiving loop make-up data, it is the customer's option to request loop conditioning. Loop conditioning includes the necessary work in the outside plant to provide a facility that will allow the transmission of high-speed digital service, such as DSL. This work may include the removal of load coils, repeaters or bridged taps.

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[19]Loop qualification (a.k.a. loop make-up) is addressed in Section XI(b).

A. ARGUMENT

1. Load Coils

Sprint witness Davis explains that load coils are placed at regular intervals on copper cable pairs that are 18,000 feet or longer. The purpose of a load coil is to improve the transmission quality for voice grade services on the longer pairs by reducing the signal loss caused by the capacitance of the telephone cable. Copper pairs that are less than 18,000 feet long do not require loading to provide voice grade services. However, load coils may be present on loops under 18,000 feet. As explained in Sprint's response to our staff's discovery:

> Load coils remain in some loops measuring under 18kft in situations where the pair was once used to serve a customer located beyond 18kft thus requiring load coils for voice services. As customers leave and others enter Sprint's serving area, these pairs are sometimes reassigned to customers residing within 18kft of the central office or being served by a recently placed digital loop carrier. These now shorter loops may have load coils remaining on them because it would not be necessary to remove them for just voice service.

Because load coils will block the transmission of digital services, including xDSL-based services, for both copper-fed and NGDLC-provisioned xDSL-capable loops, forward-looking networks are designed with loops that are short enough to avoid the need for load coils.

According to Sprint witness Davis, when deloading a pair the load coil generally is not actually removed; it is just disconnected from the cable pair. The witness explains that this involves snipping off the wires that connect the coil to the cable pair and then reconnecting the two ends of the cable pair. He notes that in larger cables this may involve removing a connector that splices twenty-five pairs at a time, pulling out the load coil wires and replacing the connector. Witness Davis acknowledges that the actual work time involved in making the connections is no more than a minute or two, but set-up time can be significant, particularly when working in manholes. For this reason, Sprint will unload multiple pairs at one time when working on loops under

18,000 feet in length, instead of unloading only the pair required for the current order.

2. Repeaters

A repeater is generally used to amplify a signal over a copper loop. Without such amplification, the signal will decay over distance. The types of repeaters that are found in cable plant are not used for voice grade circuits. Witness Davis explains that they are specialized modifications to the voice network that are installed to support digital services such as T1 and ISDN. As with load coils, the existence of a repeater will interfere with xDSL signals.

3. Bridged Tap

Bridged tap is any piece of the cable pair that is not in the direct path between the customer and the switching device. Like load coils and repeaters, bridged tap is an issue because it degrades the quality of any type of signal. According to witness Davis, this issue is magnified when xDSL is placed on a loop. For voice transmission on a non-loaded Revised Resistance Design (RRD) cable pair, bridged tap cannot exceed 6,000 feet. Sprint utilizes industry standard Carrier Serving Area (CSA) guidelines which limit total bridged tap to 2,500 feet, with no single bridged tap exceeding 2,000 feet for DSL capable loops.

As is the case with load coil removal, generally no plant is actually removed when bridged tap is eliminated. Witness Davis explains that the two wires of the cable pair are simply cut off and capped. Sprint's position is that excessive bridged tap can be removed the majority of the time in above ground enclosures like the customer's serving terminal (where the customer's drop wire connects to the distribution cable). Also, witness Davis notes that it is not possible to consistently remove bridged taps in multiple quantities. He explains that bridged taps occur at random in Sprint's network, rather than in 25-pair complements like load coils. Many locations may only have one bridged tap in a particular splice.

4. ALEC's Proposal

No ALEC witness testified on this issue. However, FDN filed a post-hearing brief which included a position statement and argument. Specifically, FDN argues that the FPSC should reaffirm its ruling from the BellSouth UNE proceeding (Docket No. 990649A-TP) that for loops under 18,000 feet, the charges for loop conditioning should be eliminated. In addition, FDN argues that the same decision should apply to loops over 18,000 feet. However, FDN believes that if this Commission decides to allow Sprint to charge for loop conditioning, it should require Sprint to condition multiple loops at a time for loops of all lengths. FDN makes it clear that it is not suggesting that any of the loops currently in use by POTS customers be part of the multiple loops conditioned. It is suggesting that only a portion of the spare pairs, or pairs not currently in use, be part of a multiple conditioning effort. As such, FDN believes existing customers would not be impacted in any way.

5. Sprint's Proposal

Sprint has proposed the following loop conditioning elements:

- Loop Conditioning Per Line (load coil removal for loops under 18kft)
- Loop Conditioning Per Location (load coil removal for loops over 18kft)
- Bridged Tap Removal - Any Loop Length
- Repeater Removal - Any Loop Length

Sprint's proposed rates for its various conditioning elements can be found in Appendix A.

As explained in Sprint's cost model documentation, its study develops the one-time, non-recurring labor expense associated with conditioning an unbundled loop. This rate is applied when inhibiting network components (i.e., load coils, repeaters, etc.) are present in the loop and the customer still desires a DSL-capable loop. This rate element removes those inhibiting items.

Sprint witness Davis notes that Sprint's loop conditioning cost methodology is based upon unit costs contained in current contracts Sprint has with outside plant contractors in Florida to perform the work necessary to condition cable pairs. For load coil removal on loops over 18,000 feet, all bridged tap, and repeater removals, the costs are determined on a per location basis, dependent upon the type of outside plant facilities (underground, aerial or buried). Witness Davis believes that this methodology enables Sprint to recover costs that vary with the different types of plant conditions encountered when performing loop conditioning activities. For instance, he notes that it is more time-consuming to perform loop conditioning activities in manholes than it is to perform the same procedures on aerial or buried outside plant (OSP) facilities. In addition, unlike the aerial and buried OSP environments, a single technician cannot perform conditioning activities in manholes because a minimum of two technicians is required for safety reasons. Furthermore, additional time is required for pumping out water and purging potentially dangerous gases. These actions are not required when working in aerial and buried OSP facilities. The witness also states that manholes are usually located and accessed in city streets; therefore, there are additional costs associated with setting up traffic control, as opposed to aerial and buried environments where utility trucks can usually pull off the roadway.

Sprint's study assumes that the majority of cable pair access locations involves quick and easy access to the cable pairs via "ready access" splice enclosures when working in both aerial and buried plant facilities. Sprint's costing methodology accounts for the significant labor cost differences associated with accessing cable pairs to perform loop conditioning activities when working in different OSP environments. Witness Davis explains that in order to avoid a double counting problem with engineering and travel time when multiple conditioning activities occur on one cable pair, Sprint calculated a separate one time per loop charge for "Engineering" and "Travel."

According to witness Davis, Sprint offers an alternate, TELRIC-based view of load coil removal for loops under 18,000 feet in length. He notes that because cable pairs are generally loaded in groups of 25, and loading is not required at all on loops under 18,000 feet, separate costs were determined based on a more efficient load coil removal process. He believes that it is reasonable to spread the fixed costs of accessing the cable pairs across all pairs that would be unloaded in a 25 pair binder group. Specifically, the incremental labor costs associated with unloading

24 more cable pairs (under 18,000 feet) was added to a single engineering and travel charge and then divided by 25 to determine the cost per pair for the entire binder group. Witness Davis believes that the costing methodology utilized by Sprint represents the "least-cost, most efficient" standard established by the FCC.

6. Appropriate Rates for Loop Conditioning

Sprint witness Davis believes that TELRIC principles can be applied to loop conditioning non-recurring cost methodologies. He notes that the FCC has found that pricing on the basis of forward-looking costs is a key element in fostering competition in the local services market. Specifically, he points to Sections 51.319(a)(3)(B) and (C) of the FCC's Rules, which state that line conditioning costs must be recovered "in accordance with the Commission's forward-looking pricing principles . . .," and that ILECs shall recover nonrecurring loop conditioning costs "in compliance with rules governing nonrecurring costs in Section 51.507(e)," that is, based on an ILEC's forward-looking economic costs. The witness asserts that these TELRIC pricing principles should be followed with respect to costs associated with load coil removal on loops that are shorter than 18,000 feet. While bridged tap and repeater removals must be accomplished on a per loop basis, load coil removals for loops shorter than 18,000 feet can be accomplished most efficiently by performing the work on a bulk-basis.

Witness Davis reiterates that an efficient service provider should develop charges for loop conditioning that are based on TELRIC principles, recognizing logical economies of scale and least-cost methodologies, including an assumption that the ILEC will remove load coils in groups of at least 25 at a time for loops shorter than 18,000 feet.

Regarding the issue of compensation for loop conditioning, the FCC stated in Order FCC 99-238 (the UNE Remand Order):

> In the *Local Competition First Report and Order*, the Commission also stated that requesting carriers would compensate the incumbent LECs for the cost of conditioning the loop. Covad and Rhythms argue that, because loops under 18,000 feet generally should not require devices to enhance voice-transmission, the

> requesting party should not be required to compensate the incumbent for removing such devices on lines of that length or shorter.
>
> . . .
>
> We agree that networks built today normally should not require voice-transmission enhancing devices on loops of 18,000 feet or shorter. Nevertheless, the devices are sometimes present on such loops, and the incumbent LEC may incur costs in removing them. Thus, under our rules, the incumbent should be able to charge for conditioning such loops.
>
> . . .
>
> We recognize, however, that the charges incumbent LECs impose to condition loops represent sunk costs to the competitive LEC, and that these costs may constitute a barrier to offering xDSL services. We also recognize that incumbent LECs may have an incentive to inflate the charge for line conditioning by including additional common and overhead costs, as well as profits. We defer to the states to ensure that the costs incumbents impose on competitors for line conditioning are in compliance with our pricing rules for nonrecurring costs.

FCC Order 99-238 at ¶¶ 192-194.

<u>Load Coil Removal - Loops shorter than 18,000 feet</u>

As noted above, Sprint considers it reasonable to spread the fixed costs of accessing the cable pair across all the pairs that would be unloaded in a 25-pair binder group. Specifically, the incremental labor costs associated with unloading 24 additional cable pairs are added to a single engineering and travel charge and then divided by 25 to determine the cost per pair for the entire binder group. This cost was then adjusted based upon the feeder fill percentage. In the Sprint study, it is assumed that two load point locations would exist for loops under 18,000 feet, and are based on the frequency of occurrence of underground, aerial, and buried outside plant facilities encountered at these first two load point locations. Sprint believes that this enabled the determination of a realistic weighted average cost to de-load loops shorter than 18 kft. The weighted average cost was then multiplied by the percentage of loaded loops. This charge also includes the costs of:

- engineering charge
- trip charge
- splicing contractors per work unit negotiated contract rate.

Only 3.2% of Sprint's loops in Florida measuring less than 18kft contain load coils.

In general, we agree with Sprint's approach for determining costs for removing load coils on loops less than 18,000 feet. Primarily, we agree that if we choose to set rates for load coil removal on loops under 18,000 feet, that differentiating by OSP types and conditioning multiple pairs is most efficient. However, as noted by FDN in its brief: "The Commission has previously determined that for loops shorter than 18,000 feet, the charges for loop conditioning should be eliminated. We found that such charges do not appear to be consistent with a forward-looking cost methodology[20]."

Specifically, in the decision alluded to by FDN, we found (in pertinent part):

> . . . loop conditioning for short loops, element A.17.1, shall be eliminated. Based on the record, this does not appear to be consistent with a forward-looking cost methodology.
>
> . . .
>
> Nevertheless, for loops shorter than 18 Kft., loop conditioning does not appear to be consistent with a forward-looking cost methodology.
>
> Therefore, upon consideration, we shall set rates for the loop modification elements, with the exception of A.17.1.

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[20]BellSouth UNE Order at 459.

Order No. PSC-01-1181-FOF-TP, issued May 25, 2001, in this docket at pp. 459-460 (BellSouth UNE Order).

In addition, in our Order on Reconsideration we found:

> Upon consideration, we find that BellSouth has not identified a mistake of fact or law in our decision on this point. As recognized in our Order at p. 459, "Nevertheless, for loops shorter than 18 Kft., loop conditioning does not appear to be consistent with a forward-looking cost methodology." We emphasize that there was extensive discussion regarding this issue at the April 18, 2001, Agenda Conference. As clearly stated in the Order, we made our decision to reject nonrecurring charges for load coil removal on short loops based upon a policy decision that a forward-looking network would not have load coils on short loops. BellSouth has not identified anything we overlooked, and in fact, acknowledges that short loops in a forward-looking network would not have load coils on them. As such, BellSouth's Motion on this point shall be denied. (emphasis added)

Order No. PSC-01-2051-FOF-TP, issue October 18, 2001 at p. 15 (BellSouth UNE Reconsideration Order).

As part of our staff's discovery, Sprint was asked:

> Please explain what circumstances, if any, should result in the FPSC reaching a different decision than that reached in Order PSC-01-1181-FOF-TP and PSC-01-0251-FOF-TP regarding the applicable rate for removing load coils from loops under 18kft.

The company replied:

> According to the FCC's Third Report and Order, paragraphs 192-193, ILEC's [sic], like Sprint-Florida, are allowed to recover the cost of loop conditioning. Sprint has filed a NRC for load coil removal based on this ruling. Sprint's study incorporates the efficiencies of 25 pair economies and spreads this cost over all DSL capable loops which ensure that these costs are being shared by

> all uses of these loops, including Sprint-Florida's own DSL customers. Also as explained previously in response to interrogatory 21(a), load coils do sometimes exist on loops shorter then 18kft in situations where the pair was once part of a loop longer than 18kft.

At his April 5, 2002, deposition witness Davis was asked if he would agree that this Commission decided in its BellSouth UNE Order that there should not be a charge to remove load coils from loops under 18 kilofeet. He responded, "That is what I read, yes." In addition, the witness was asked to read several pages from the BellSouth UNE Order. He was then asked a series of questions based on what he read. In responding to whether he would agree that this Commission had already considered the testimony of Sprint witness McMahon and FCC Order 99-238 in reaching our decision, the witness stated that the FCC also talked about the fact that there are load coils in the embedded plant and that under the FCC's rules that ILECs have the right to recover the cost for removing inhibitors, including load coils. Further, he stated that this Commission considered the context of the FCC order but that this Commission disagreed with that information in the FCC order. When asked if Sprint had any additional information it believed this Commission failed to consider in reaching our decision in BellSouth UNE Order, he responded:

> Only to reiterate what we said in our interrogatory. We do have load coils in this embedded base. We will have costs associated with removing load coils. We have provided a cost structure that takes into account the spirit of TELRIC in terms of efficiency, assuming 25 pair conditioning. We have spread the cost of the load coil removal over all users of those pair, including our own retail DSLs. So we have apparently taken into consideration the cost and we would like to spread that cost over all users.

B. DECISION

1. Load Coil Removal - Loops Under 18,000 Feet

While we are aware that Sprint and BellSouth are two distinct companies, we find that Sprint provided no new facts here that should cause us to reconsider our prior decision to ". . . reject nonrecurring charges for load coil removal on short loops based upon a policy decision that a forward-looking network would not have load coils on short loops." (emphasis added) Order No. PSC-01-2051-FOF-TP at p. 15. In addition, we note that Sprint was a participant in the BellSouth portion of the hearing and we considered testimony filed by Sprint's witness regarding conditioning short loops. As such, we find that our decision that a rate of zero apply to load coil removal for loops under 18,000 feet is appropriate. Sprint was given the opportunity to provide additional information in both an interrogatory response and at deposition as to why a rate other than zero could be appropriate for load coil removal on loops under 18,000 feet. We were not persuaded by the information provided; therefore, we find that there be no charge to remove load coils on loops under 18,000 feet.

2. Load Coil Removal - Loops 18,000 feet and longer

For load coil removal on loops over 18,000 feet Sprint's costs were determined on a per location basis, dependent upon the type of outside plant facilities. This methodology enables Sprint to recover costs that vary with the different types of plant conditions (i.e., underground, buried, or aerial) encountered when performing loop conditioning activities. For instance, as previously noted by Sprint witness Davis, it is more time-consuming to enter a manhole to perform loop conditioning activities than it is to perform the same procedures on aerial or buried OSP. The charge for load coil removal on loops over 18,000 feet includes the cost of:

- Engineering charge.
- Trip charge.
- Contract rate to access cable pair.
- Contract rate to unload one pair.
- Contract rate to unload each additional pair.

As noted above, no party other than Sprint filed testimony on this element. However, in its post-hearing brief FDN addressed this issue.

At his deposition witness Davis was asked why loops over 18,000 feet were conditioned individually instead of 25 at a time. The witness explained:

> Load coils are necessary to provide voice service when the loop is over 18,000 feet. So if we took a load coil off, that loop would not be able to support voice. And as we want to preserve the ability for our loops to provide voice, we don't want to have to -- in other words, if someone ordered DSL service and we went out and took two off and then we needed that pair for voice, we'd have to go out and put it back on.

In addition, witness Davis was asked if there could be times when Sprint engineers may find it necessary to condition more than one loop over 18,000 feet. He explained that "There would have to be something that would drive that necessity. I don't see what that could be." The Sprint witness reiterated that the reason load coils are removed from loops over 18,000 is if they inhibit data transmission; however, for voice, load coils are needed.

In its brief FDN argues that this Commission should reaffirm its policy in the BellSouth UNE Order for loops under 18,000 feet and extend it to loops longer than 18,000 feet. As such, FDN argues that the rate for load coil removal on long loops should be set at zero. In the alternative, FDN argues that if this Commission decides to allow Sprint to charge for loop conditioning it should require Sprint to condition multiple loops at one time. FDN states that they are not suggesting that any of the loops currently in use by POTS customers be part of the multiple loops conditioned. They believe the only pairs that are candidates to be conditioned in multiples are a portion of the spare pairs, or pairs not currently in use. Since FDN is suggesting that only spare pairs be considered for multiple loop conditioning, they contend that existing customers would not be impacted in any way.

While FDN's arguments may have some merit, it did not provide any evidence to support or sufficient detail regarding its proposal that only spare pairs be conditioned in multiple increments. As such, the only supported proposal for us to consider with regard to conditioning loops over 18,000 feet is that made by Sprint.

We find that Sprint's approach for determining load coil removal costs on loops longer than 18,000 feet is reasonable. Primarily, we agree that conditioning one pair at a time is rational since the record demonstrates that load coils are necessary to support voice service on loops over 18,000 feet. In addition, we support Sprint's methodology that enables it to recover costs that vary with the type of plant conditions encountered (i.e., underground, buried, aerial) when conditioning loops. As such, we find Sprint's proposed method for calculating load coil removal costs for loops over 18,000 feet is appropriate and further find that it shall be used in conjunction with the changes in all other applicable prior sections. Our rates are found in Appendix A.

3. Bridged Tap and Repeater Removal - Loops of Any Length

For bridged tap and repeater removal the costs were determined on a per location basis, dependent upon the type of outside plant facilities to be worked on. This methodology enables Sprint to recover costs that vary with the different types of plant conditions encountered when performing loop conditioning activities. For instance, it is more time-consuming to enter a manhole to perform loop conditioning activities than it is to perform the same procedures on aerial or buried outside plant (OSP) facilities. This is largely due to the fact that manhole work must be performed by a minimum of 2 technicians for safety reasons. Additionally, such UG facilities must be ventilated to be purged of potentially dangerous gases and often need to be pumped out for water. This charge includes the costs of:

- Engineering charge.
- Trip charge.
- Contract rate to remove bridged tap and or repeater.
- Contract rate to remove each additional bridged tap or repeater at the same time, location and cable.

Sprint witness Davis notes that it is not possible to consistently remove bridged taps in multiple quantities. He explains that bridged taps occur at random in Sprint's network, rather than in 25-pair complements like load coils. Many locations may only have one bridged tap in a particular splice.

No party other than Sprint filed any testimony addressing the removal of bridged tap or repeaters. As such, we approve of Sprint's proposed rates for bridged tap and repeater removal. As with its other conditioning elements, Sprint's study reflects the varied costs when removing bridged taps or repeaters in aerial, buried, or outside plant. We support this approach and find it is reasonable.

XI(b): LOOP QUALIFICATION INFORMATION RATE AND APPLICATION

As with the previous section, Sprint was the only party to provide testimony on this issue. FDN provided argument in its post-hearing brief.

The issue of loop make-up (LMU) or loop qualification was addressed by the FCC in its UNE Remand Order[21]. Paragraphs 426 - 429 of the FCC's UNE Remand Order specifically address ALEC access to the incumbents' loop make-up information. These paragraphs state, in pertinent part:

> . . . the Commission should clarify that the pre-ordering function includes access to loop qualification information. Loop qualification information identifies the physical attributes of the loop plant (such as loop length, the presence of analog load coils and bridge taps, and the presence and type of Digital Loop Carrier) that enable carriers to determine whether the loop is capable of supporting xDSL and other advanced technologies. ¶ 426
>
> . . . an incumbent LEC must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent, so that the requesting carrier can make an independent judgement about whether the loop is capable of supporting the advanced services equipment the requesting carrier intends to install. ¶ 427
>
> . . . an incumbent must provide access to the underlying loop information and may not filter or digest such information to provide only that information that is useful in the provision of a particular type of xDSL that the incumbent chooses to offer. . . . Instead, the incumbent LEC must provide access to the underlying loop

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[21]FCC Third Report & Order, CC Docket No. 96-98, In the Matter of Implementation of the Local Competition Provision of Telecommunications Act of 1996, Order No. FCC 99-238, (November 5, 1999), (UNE Remand Order).

> qualification information contained in the engineering records, plant records, and other back office systems so that requesting carriers can make their own judgements about whether those loops are suitable for the services the requesting carrier seeks to offer. Otherwise, incumbent LECs would be able to discriminate against other xDSL technologies in favor of their own xDSL technology. ¶ 428
>
> We disagree, however, with Covad's unqualified request that the Commission require incumbent LECs to catalogue, inventory, and make available to competitors loop qualification information through automated OSS even when it has no such information available to itself. If an incumbent LEC has not compiled such information for itself, we do not require the incumbent to conduct a plant inventory and construct a database on behalf of requesting carriers. We find, however, that an incumbent LEC that has manual access to this sort of information for itself, or any affiliate, must also provide access to it to a requesting competitor on a non-discriminatory basis. In addition, we expect that incumbent LECs will be updating their electronic database for their own xDSL deployment and, to the extent their employees have access to the information in an electronic format, that same format should be made available to new entrants via an electronic interface. ¶ 429

Sprint currently offers a manual LMU element[22]. As set forth in Hearing Exhibit 1, Sprint's proposed rate for loop qualification information is a non-recurring charge of $37.55. According to its cost study documentation, Sprint has developed procedures to provide ALECs with LMU and electrical parameter data. The LMU information provided includes: (1) the composition of the loop material; (2) the existence, location and type of any electronics, bridge taps, load coils, disturbers etc.; (3) loop length; (4) the wire gauge(s) of the loop; and (5) the electrical parameters of the loop. The data is intended to enable the ALEC to determine the type of service that can be sold on specific loops.

[22]Sprint Florida does not plan to develop an end-to-end electronic loop qualification query and reporting tool until demand for high-speed products is sufficient enough to justify the system enhancement costs.

We believe that after reviewing the pertinent portions of the FCC's UNE Remand Order, and the limited testimony presented, we must address at least three issues related to Sprint's loop qualification offering. First, is Sprint providing the ALECs with comparable access to loop qualification information as it provides to itself? Second, does Sprint's LMU offering comport with the FCC's UNE Remand Order? Third, what rate if any should apply when an ALEC obtains LMU information?

A. IS SPRINT PROVIDING ALECS COMPARABLE ACCESS TO LOOP MAKE-UP INFORMATION?

1. Argument

As stated in the FCC's UNE Remand Order, the incumbent LEC is required to provide the ALEC with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent so that the requesting carrier can make an independent judgement about whether the loop is capable of supporting the advanced services equipment the requesting carrier intends to install. UNE Remand Order at ¶¶ 426-429. In addition, the UNE Remand Order requires that an incumbent LEC that has manual access to this sort of information for itself, or any affiliate, must also provide such manual access to a requesting competitor on a non-discriminatory basis. The FCC also found that ". . . to the extent their employees have access to the information in an electronic format, that same format should be made available to new entrants via an electronic interface." Id. at ¶ 429. However, it is noted that if an incumbent LEC has not compiled such information for itself, the FCC does not require the incumbent to conduct a plant inventory and construct a database on behalf of requesting carriers. Id. at ¶ 429.

In order to determine if Sprint is providing ALECs comparable access to LMU information, one must first look at how Sprint's own personnel access LMU information. When questioned at deposition, Sprint witness Davis asserted that the method for obtaining loop make-up information for the ALEC was the same process Sprint used for its retail operations. When asked in discovery to explain how Sprint employees access loop make-up information, the following response was provided:

Sprint-Florida's field team accesses loop make-up information using Byers Engineering Map Viewer 8.0.9.5 Plus Edition for Windows. Map Viewer functionality permits the user to locate and access maps as well as gather information for loop make-ups. Map Viewer runs on Sprint-Florida's core outside plant Engineering Work Order (EWO) platform. The following information is gathered and manually input into the remarks section of the Service Order:

LOOP MAKE UP INFORMATION:
COPPER FACILITIES (Yes/No)
ELECTRONIC FACILITIES (Yes/No)
TYPE OF ELECTRONICS
LOCATION OF ELECTRONICS (# of feet)

LOOP LENGTH:
19GA COPPER (#) FEET 16.1 RESISTANCE PER KF
22GA COPPER (#) FEET 32.4 RESISTANCE PER KF
24GA COPPER (#) FEET 51.9 RESISTANCE PER KF
26GA COPPER (#) FEET 83.3 RESISTANCE PER KF
TOTAL LOOP FOOTAGE IS (#) FEET

BRIDGE TAPS:
1st AT (#) FEET - LENGTH (#) FEET - COSTS ($)
2nd AT (#) FEET - LENGTH (#) FEET - COSTS ($)
3rd AT (#) FEET - LENGTH (#) FEET - COSTS ($)
4th AT (#) FEET - LENGTH (#) FEET - COSTS ($)
5th AT (#) FEET - LENGTH (#) FEET - COSTS ($)
6th AT (#) FEET - LENGTH (#) FEET - COSTS ($)
ENGINEERING CHARGE ($)
TRIP CHARGE($)
DISTURBERS PRESENT\NONE INDICATED
LOAD COILS PRESENT ON CABLE PAIR (Yes/No)
COST TO REMOVE LOADS ON NON-STANDARD LOOP ($)
TOTAL RESISTANCE FOR LOOPS IS (#) OHMS
COST FOR CONDITION IS ($)
COST FOR 2ND OR MORE UNE LOOP AT THE SAME ADDRESS IS ADDITIONAL ($) EACH (EXH 10, pp. 248-249)

> ELECTRICAL PARAMETERS
>
> There are two test systems used to collect electrical parameters data for loop pre-qualification used in Florida, depending on the geographic region: Teradyne 4-Tel and Nortel Networks' CALRS (Centralized Automated Loop Reporting System). Each of these systems provides results in a different format. The specific detailed results are then manually entered into the service order in the Remarks section.
>
> Once the loop make-up and electrical parameter information has been input to the service order, the field team closes the pre-qualification order. The Automated Routing & Completion (ARC) System will route (autofax) the completed pre-qualification service order to the requesting CLEC based on the FAX number supplied by the CLEC.

At his deposition, witness Davis was asked if any part of Sprint's loop qualification process was electronic. Under questioning, the witness conceded that part of the loop qualification process is electronic, but he emphasized that the process also includes manual steps. Specifically, he stated that there is mechanized information and databases, but that it has to be manually researched and the data has to be manually gathered. He agreed that for every single query regarding loop make up, manual research need to be conducted.

In its brief FDN argues that based on Sprint's description of its loop make-up process in response to our staff interrogatory, the records are electronically accessible by Sprint personnel. FDN also argues that the only manual part of the process is having a Sprint employee review the records and determine if the loop is xDSL-capable. Moreover, FDN contends that

> For this, the ALEC is charged $37.55 while Sprint retail personnel could directly access this information and determine the xDSL capability of the loop. The charge for loop qualification should be based as if the ALEC had the same type of access that Sprint personnel has. There should be no manual charge for researching and interpreting the information.

In this section, we note that it is only addressing access. That being said, we do not believe that Sprint and the ALECs have comparable access to LMU information.

As addressed above, Sprint offers ALECs manual access to LMU information. However, it appears that Sprint's personnel retrieve loop make-up information from various databases. Specifically, it appears that the information that is gathered is obtained from Map Viewer, Teradyne 4-Tel and Nortel Networks' CALRS (Centralized Automated Loop Reporting System), each of which appears to be some type of database.

In explaining the process of providing loop make-up information, Sprint states that " . . . information is gathered and manually input into the Remarks section of the Service Order . . . ." Also, Sprint witness Davis acknowledged that " . . . it's in the database that we have already. I mean we're pulling it out of a database. It's recorded on a document and handed off to someone."

In its cost study, Sprint describes the steps taken to perform a LMU (see Table 11b-1) for an ALEC. We note that many of these steps take only minutes; we find that if researching paper records were necessary (i.e., manual processing), additional time would be necessary to complete each task. The pertinent steps as described in the Sprint study are provided in Table 11b-1, along with the time estimate (minutes) identified to complete each task.

TABLE 11(b)-1 Loop Qualification Information Request Process (Field Team)	
Step Description	Time Estimate/ Minutes
Order is pulled from the printer.	1
Terminal and cable pair are researched. Mapviewer is accessed. Cable IPID is identified for the loop. Loop makeup is accessed in Mapviewer and loop makeup is run. Loop makeup information is added to the remark section of the service order.	23
Electrical Parameters are researched and added to the remark section of the service order.	5
Disturber data researched and added to the remark section of the service order	5
The service order is closed.	1

(EXH 2, NRC Study, p. 23)

We find that the FCC's UNE Remand Order explicitly addresses situations in which ILEC employees have access to loop make-up information in an electronic format. Specifically, the FCC found that to the extent ILEC employees have access to the information in an electronic format, that same format should be made available to ALECs via an electronic interface. (emphasis added) Id. at ¶ 429. However, there was a caveat: the FCC noted that if an ILEC has not compiled the information for itself, it is not required to conduct a plant inventory and construct a database on behalf of requesting carriers. Id. at ¶ 429. This caveat does not appear to apply to Sprint. At his deposition, when questioned about loop make-up information, Sprint witness Davis stated: "That's just looking at existing information and developing a report to provide." (Emphasis added) In addition, he noted "It's already - - it's in, it's in the database that we have already." Last, we note that the Sprint witness also stated that " . . . the cable records are not paper now. They are more sophisticated than that. But the point is they have to be looked up, they have to be researched."

2. Decision

Sprint-Florida and the ALEC community do not have comparable access to LMU information. We find that Sprint's loop qualification information currently resides in databases which Sprint's personnel can access electronically. As such, the ALECs are not provided with comparable access as required by ¶ 429 of the FCC's UNE Remand Order.

Accordingly, we find that Sprint shall be required to implement an electronic loop qualification offering. Because the record lacks information on how significant an undertaking this may be, we find that Sprint shall be required to report within 60 days of the order in this docket becoming final, when and how it will have an electronic loop qualification offering in place. Until an electronic interface is in place, those ALECs that require loop qualification information shall not be subject to a manual loop make-up charge of $37.55; rather, the ALECs shall be charged an interim rate of $5.90. The development of this rate is addressed below.

B. DOES THE LMU INFORMATION PROVIDED BY SPRINT COMPORT WITH THE FCC'S UNE REMAND ORDER?

1. Argument

With regard to the information that Sprint must provide to the ALECs, the FCC noted in its UNE Remand Order that it must be the same detailed information about the loop that is available to the ILEC, so that the requesting carrier can make an independent judgement about whether the loop is capable of supporting the advanced services equipment the requesting carrier intends to install. Id. at ¶ 427. The FCC also noted that the ILEC cannot filter such information to provide only information that is useful in the provision of a particular type of xDSL that the incumbent chooses to offer. Id. at ¶ 428.

Based on Sprint's response to our staff's discovery, it appears that Sprint is providing the ALECs with information about the loop that enables them to make an independent judgement about whether the loop is capable of supporting advanced services. However, it appears as if Sprint may be providing information which is beyond the requirements of the FCC's UNE Remand Order. For example, as part of the information provided to the ALEC, Sprint also includes engineering charges, trip charges, and costs for conditioning. While this information may be useful to some ALECs, it is not clear to us whether ALECs need this information and, more importantly, if ALECs want to pay for this additional information when obtaining loop make-up information. The FCC's UNE Remand Order does not appear to address situations in which an ILEC is providing more information than may be necessary to determine if a loop is capable of supporting advanced services equipment. Therefore, we believe that while the information may not be useful to all ALECs, it does not appear to be harmful. Furthermore, it is not clear what cost savings, if any, could be gained by deleting this information from Sprint's current manual loop make-up report.

2. Decision

We find that Sprint is providing the same information to the ALECs that it provides to itself. In addition, Sprint is providing additional information which may or may not be useful to the ALEC requesting the loop make-up information. Since it does not appear that the additional information would harm or disadvantage an ALEC, we find that it remain on the manual loop make-up report provided to the ALEC by Sprint personnel.

C. WHAT RATE, IF ANY, IS APPROPRIATE FOR LMU INFORMATION?

The issue of an appropriate rate is somewhat clouded because we find that Sprint does not offers ALECs access to LMU information in compliance with the FCC's UNE Remand Order. As addressed above, we find an interim rate of $5.90 is appropriate at this time. The interim rate should remain in effect until Sprint implements electronic access to its LMU information. Once electronic access is implemented, we shall evaluate the interim rate and make adjustments as needed. In addition, at that time the manual loop make-up process should continue to be made available to ALECs at the rate proposed by Sprint in this proceeding.

1. Argument - Interim Rate Development

There is limited information on the record regarding the appropriate rate for loop qualification. As such, we find that the best data is that provided by Sprint in its non-recurring loop qualification study.

Sprint's proposed non-recurring rate for its manual Loop Qualification is $37.55. The $37.55 rate is comprised of $13.29

for the National Exchange Access Center (NEAC)[23] costs and $24.26 for Field Team costs. In developing the interim rate for a mechanized loop make-up element, we find that the following adjustments shall be made to the Sprint study:

- Eliminate the $13.29 charge for the NEAC.
- Eliminate all field work charges for processing a manual order (i.e., pull order from printer and close service order).
- Reduce remaining field work activities time by 75%.

We find that the NEAC charge should be eliminated because the NEAC is essentially the group which handles ALEC orders. If an ALEC were to access LMU information electronically (comparable to Sprint personnel), there would not be an order submitted. In fact, an ALEC could obtain LMU information for several loops and never place an order. As such, the NEAC would not be necessary if electronic access to LMU information was made available to the ALEC community. Therefore, this component shall be eliminated on an interim basis.

With regard to the field work time included in the study, staff believes that the time associated with the field team obtaining the order and closing the order should be eliminated. Again, an ALEC with electronic access to LMU information would not place an order and as such should not be charged for these steps. The remaining charges associated with field work tasks are for obtaining the loop make-up information. It appears based on the descriptions provided in Sprint's study that the field work consists of gathering information from the various databases and then taking that information and adding it to the remarks section of the order. We find that taking existing information from Sprint's existing databases and entering it in the remarks section of the order is time-consuming. Moreover, an ALEC with electronic access to the loop information would avoid this activity. As such, we find that the work times for these activities shall be reduced by 75%. Our adjustments are summarized in the table below.

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[23]The NEAC provides a central point of contact for the ALEC for ordering, provisioning coordination, bill inquiry, and dispute resolution for ALEC orders.

TABLE 11(b)-2: Loop Qualification Information Request Process
Staff's Recommended Adjustments

	Cost Shown in Study	Approved Cost
NEAC Costs	$13.29	$0.00
Itemized Field Team Costs		
Order is pulled from printer	$ 0.69	$0.00
Terminal and cable pair are researched. Mapviewer is accessed. Cable IPID is identified for the loop. Loop makeup is accessed in Mapviewer and loop makeup is run. Loop makeup information is added to the remark section of the service order.	$15.94	$4.16
Electrical Parameters are researched and added to the remark section of the service order.	$ 3.47	$0.87
Disturber data researched and added to the remark section of the service order	$ 3.47	$0.87
The service order is closed.	$ 0.69	$0.00
Total	$37.55	$5.90

2. Decision

We find Sprint is not providing the ALEC community with comparable access to loop qualification information. As such, Sprint is required to implement an electronic loop qualification offering. Because the record lacks information on how significant an undertaking this may be, we find that Sprint shall be required to report within 60 days of the order in this docket becoming final, when and how it will have an electronic loop qualification offering in place. Until an electronic interface is in place, those ALECs that require loop qualification information shall not be subject to a manual loop make-up charge of $37.55; rather, the ALECs shall be charged an interim rate of $5.90.

Once comparable access is provided, the interim rate of $5.90 should be reevaluated and adjusted accordingly. Furthermore, once an electronic loop qualification process is in place, the ALEC community should be provided with the option of obtaining the information manually or electronically. At that time, the rate for the manual loop qualification process should be that proposed by Sprint in this proceeding.

XII (a) and (b): RECURRING AND NON-RECURRING RATES FOR CERTAIN UNE COMBINATIONS

A. ARGUMENT

Sprint proffered some testimony regarding its obligation to combine UNEs on behalf of the ALEC. Much of that testimony is largely moot because the Supreme Court in Verizon Communications Inc., et al. v. Federal Communications Commission, et al.,152 L. Ed. 2d 701, 122 S. Ct. 1646 (2002), has issued a ruling which addresses these obligations. Moreover, this issue is to address the appropriate rates for UNE combinations, not the situations in which such combinations are required. As such, we will not address any testimony which goes beyond the stated issue.

1. Unbundled Network Element Platform (UNE-P)

A UNE-P consists of a 2-wire loop and switch port combination. With the exception of the loop, Sprint believes that the rate for the UNE platform should be the sum of the statewide average rates for each individual element. However, in the case of the loop and switch port, costs that are included in each element when bought on a standalone basis are eliminated when they are provided in combination[24]. As such, Sprint develop a combined loop and port cost for each wire center. The combined costs were then banded based on the 2-wire banding results, resulting in three rate bands. In addition, Sprint witness Hunsucker notes that any deviations from the general principle that UNE combinations be priced at the sum of the individual UNEs which make up that combination, is to accurately reflect the actual forward-looking costs of that UNE combination.

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[24]Specifically, witness Hunsucker explains that in the case of unbundled loops provided using a DLC, two voice-grade line cards are included in the cost of the unbundled loop: one at the DLC-remote terminal and one at the DLC-central office terminal. When loop and switching are provided in combination, only the voice-grade line card at the DLC-remote terminal is required. If the UNE combination were priced at the sum of the individual UNEs, CLECs would be paying for three line cards, although only one voice-grade line card would be used. Therefore, witness Hunsucker contends that the appropriate price for that UNE combination would be the sum of the loop and switching UNE rates, less the costs of two line cards.

The primary difference between the cost of UNE-P and those elements purchased on a standalone basis, is the result of the technology used to provide the elements. Specifically, as explained by Sprint witness Cox, the technical difference between unbundled loops and ports purchased as part of UNE-P is that the GR-303 interface is used in place of an analog interface. With GR-303 the Integrated Digital Loop Carrier (IDLC) Central Office Terminal (COT) is integrated with the central office switch. This technology permits connectivity between the switch and COT at the DS-1 level in lieu of individual switch line cards and COT line cards connected back to back with analog jumpers. Witness Cox notes that the positive economies for loops sold in combination with switching are related to the differences in labor and material in the IDLC system and to the substitution of DS-1 level for line level switch and COT interfaces.

In his testimony, witness Dickerson also noted that Sprint's UNE-P cost study reflects the network economies available through use of IDLC when loop and switch UNEs are sold on a combined basis. He explains that the Sprint Loop Cost Model (SLCM) inputs are the same as for UNE 2-wire loop with the exception of the DLC inputs, and that a second run of SLCM was done solely for determining the cost of loops using IDLC[25].

Witness Dickerson also notes that the dedicated or common transport component of UNE-P is not reflected in Sprint's cost study output because it is not possible to predict where the ALEC will request its traffic to be routed (Sprint's dedicated transport cost study has approximately 500 point-to-point routes). However, both the dedicated transport and common transport UNE options are available as part of UNE-P, and the cost of the transport ordered by the ALEC would simply be added to the cost of UNE-P.

With regard to non-recurring charges for UNE-P, witness Davis notes that for a new 2-wire analog UNE-P, the NRC is equal to the cost of the local loop installation. He explains that this is because Sprint assumes 100% flow-through automated systems whereby there is no installation charge for the port. In its study, Sprint

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[25] Witness Dickerson explained that similar adjustments were needed to reflect the cost of combined 2-wire ISDN loops and switch ports. Specifically, the integrated GR303 switch and DLC network configuration that yields cost savings for combined POTS loop and switch ports are available for ISDN-BRI.

has identified the major cost determinants for its non-recurring installation charges for UNE-P. This information is summarized below.

2. Installation Charges - UNE-P

First Line, Loop and Port - 2 Wire
This charge is applied for the installation of a service where a field visit is required to connect the service at a cross connect, terminal, or network interface device (NID)/protector. This charge includes the costs of:

- 2-Wire Analog Loop installation non-recurring charge.
- 100% flow through automated systems is assumed. No installation NRC is applied when ordering a port.

Second or Additional Loop and Port - 2 Wire
This charge is applied for the installation of an additional service where a field visit occurs as part of a "New" installation. This charge includes the costs of:

- 2-Wire Analog Loop Additional Line non-recurring charge.
- 100% flow though automated systems is assumed. No installation NRC is applied when ordering a port.

Reinstall Loop and Port 2 Wire
This change is applied if the installation can be completed without a field visit, such as a previous service that was left in place as a CT or DCOP.
It includes the costs of:

- 2-Wire Analog Loop Re-install cut through or DCOP non recurring charge.
- 100% flow through automated systems is assumed. No Installation NRC is applied when ordering a port.

UNE-P Voice Grade Migration from Resale
This charge is applied when a CLEC migrates an existing resale customer to UNE-P. This charge is for records and billing work only, no field work is required. This charge includes the costs of:

- Disconnecting service in resale major account, systems and billing.

- Establishing service in UNE-P major account, systems and billing.

Enhanced Extended Loop (EEL)

An EEL is a combination of the following UNEs:

- UNE interoffice transport,
- UNE multiplexing (where applicable), and
- a UNE loop.

Sprint proposes that the recurring rate for an EEL be calculated as the sum of the banded loop rate and route-specific dedicated transport rate in the combination. Furthermore, multiplexing rates necessary for the EEL were developed.

Sprint witness Dickerson notes that there are hundreds of possible combinations of loop and transport routes. As such, Sprint has not attempted to list all of these possible combinations, but has shown the additional costs for multiplexing equipment that is needed for DS-0 to DS-1 and DS-1 to DS-3 EEL combinations in its EEL Monthly Recurring Charges table. The development of these multiplexing cost additives is provided in Sprint's cost study filing along with illustrative drawings and descriptions.

According to Sprint witness Davis, three non-recurring costing scenarios are addressed in the Sprint study:

> EEL 1 - includes the DS0 loop, DS0/1 multiplexing and DS1 transport. For the first line, the NRC consists of the labor required for a field visit to connect the service at a cross-connect, terminal, and NID/Protector (equal to the loop installation charge) which is added to the labor associated with performing the DS0/1 multiplexing and DS1 transport provisioning functions. For the 2nd through 24th lines that are to share this initial DS1 transport facility, a reduced NRC per line occurs since an additional DS1 transport facility installation charge is not required.
>
> EEL 2 - includes a DS1 loop, DS1/0 multiplexing and DS1 transport. The NRC is the simple addition of the NRCs for

these individual UNEs. This includes the labor required for a field visit to connect the service at a cross-connect, terminal, and NID/Protector which is added to the labor associated with the DS1 transport provisioning function.

EEL 3 - includes a DS1 loop, DS1/3 multiplexing and DS3 transport. The NRC for the initial line includes the labor required for a field visit to connect the service at a cross-connect, terminal, and NID/Protector (equal to the DS1 loop installation charge) which is added to the labor associated with the DS1/3 multiplexing and DS3 transport provisioning functions. For the 2nd through 28th DS1s that are to share this initial DS3 transport facility, a reduced NRC per DS1 line occurs since an additional DS3 transport facility installation charge is not required.

As with UNE-P installation charges, Sprint also identified the non-recurring installation charges for EELs.

Installation Charges -EELs

EEL DS0 Loop, DS0 Transport - 2-Wire/4-Wire - First Line
This charge is applied for the installation of a service where a field visit is required to connect the service at a cross-connect, terminal, or NID/protector. This charge includes the costs of:

- 2-Wire or 4-Wire first line non-recurring installation charge.
- DS0 transport non-recurring installation charge.

EEL DS0 Loop, DS0/1 Multiplexing, DS1 Transport-2-Wire/4-Wire - First Line
This charge is applied for the installation of a service where a field is required to connect the service at a cross-connect, terminal, or NID/protector. This charge includes the costs of:

- 2-Wire or 4-Wire first line non-recurring installation charge.
- DS0/1 multiplexing non-recurring installation charge.
- DS1 transport non-recurring installation charge.

EEL DS0 Loop, DS0/1 Multiplexing - 2-Wire/4-Wire Ordered Same Time for Same Location
This charge is applied for the installation of an additional service where a field visit occurs as part of a "New" installation. This charge includes the costs of:

- 2-Wire or 4-Wire 2nd line non-recurring installation charge.
- DS0/1 multiplexing non-recurring installation charge.
- Shared DS1 transport (no incremental cost).

EEL DS0 Loop, DS0/1 Multiplexing - 2-Wire/4-Wire First Lines
This charge is applied for the installation of an additional service where a field visit occurs as part of an installation not worked at the same time or location as the initial order. This charge includes the costs of:

- 2-Wire or 4-Wire first line non-recurring installation charge.
- DS0/1 multiplexing non-recurring installation charge.
- Shared DS1 transport (no incremental cost).

EEL DS1 Loop, DS1 Interoffice Transport
This charge is applied for the installation of a service where a field is required to connect the service at a cross-connect, terminal, or NID/protector. This charge includes the costs of:

- DS1 loop first line non-recurring installation charge.
- DS1 interoffice transport non-recurring installation charge.

EEL DS1 Loop, DS1/3 Multiplexing, DS3 Transport -First DS1, muxing and DS3 interoffice transport
This charge is applied for the installation of a service where a field visit is required to connect the service at a cross-connect, terminal, or NID/protector. This charge includes the costs of:

- DS1 first line non-recurring installation charge.
- DS1/3 multiplexing non-recurring installation charge.
- DS3 transport non-recurring installation charge.

EEL DS1 Loop, DS1/3 Multiplexing DS1s Ordered Same Time for Same Location

This charge is applied for the installation of an additional service where a field visit occurs as part of a "New" Installation. This charge includes the costs of:

- DS1 additional line non-recurring installation charge.
- DS1/3 multiplexing non-recurring installation charge.
- Shared DS3 transport (no incremental cost).

EEL DS1 Loop, DS1/3 Multiplexing - DS1s

This charge is applied for the installation of an additional service where a field visit occurs as part of an installation not worked at the same time or location as the initial order. This charge includes the costs of:

- DS1 first line non-recurring installation charge.
- DS1/3 multiplexing non-recurring installation charge.
- Shared DS3 transport (no incremental costs).

EEL DS3 Loop, DS3 Transport

This charge is applied for the installation os a DS3 loop that is to be transported to another central office. This charge includes the cost of:

- DS3 first line non-recurring installation charge (ICB).
- DS3 Transport non-recurring installation charge.
- DS3 - DS3 cross-connect.

EEL Loop and Transportation Migration

This charge is applied to migrate an existing CLEC special access circuit to a UNE EEL. This charge is to recover records and billing work, no field work is required. This charge includes:

- Disconnecting the special circuit in access records and billing.
- Establishing UNE EEL circuit in UNE records and billing and rebuilding the circuit in CIRAS with new circuit ID.

3. FDN's Proposal

FDN did not file testimony addressing this issue. However, in its post-hearing brief, it did file a position statement and argument regarding rates for UNE combinations. With regard to the recurring charges (RCs) for UNE combinations, FDN contends that these charges should be the sum of the RCs for the UNE components which make up the combination.

FDN argues that the non-recurring charge (NRCs) for UNE combinations where the UNE combination already exists in Sprint's network should be zero or at most a nominal service order charge. FDN contends that this approach would be in accord with approaches taken by other states.

B. DECISION

1. Recurring Rates for Combinations

It appears that FDN and Sprint agree that the appropriate method for calculating RCs for UNE combinations is to sum the RCs for the UNE components which make up the combination. We also endorses this approach. In particular, we find that it is appropriate to take into consideration the benefits of technology (i.e., IDLC) in calculating the prices for loop/port combinations and any other adjustments which accurately reflect the forward-looking costs. We believe that Sprint has done this in its study. Accordingly, we find that Sprint's proposed method of calculating recurring rates for UNE combinations is appropriate and that it shall be used in conjunction with the changes in all other applicable prior sections.

2. Nonrecurring Rates for Combinations

With regard to NRCs for UNE combinations, the parties appear to disagree. However, as noted above, the only testimony on this issue was proffered by Sprint. After reviewing the limited testimony and argument presented here, we did not find any information that would lead us to conclude something other than what has been found for non-recurring costs in section VIII(d).

XIII: EFFECTIVE DATE FOR RECURRING AND NON-RECURRING RATES AND CHARGES

The issue before this Commission is to determine when the recurring and non-recurring rates and charges resulting from this docket should take effect.

A. ARGUMENT

Sprint witness Hunsucker asserts that the rates determined in this proceeding should take effect on the date the rates are filed. Witness Hunsucker recommends:

> . . . [t]hat carriers be required to file UNE rates that conform to the Commission's Order 60 days after the release of the Order. Those rates would become effective on the date they are filed.

On the other hand, Sprint notes that using the BellSouth Order would require an amendment and our approval prior to the rates becoming effective for existing agreements. In addition, Sprint emphasizes in its post-hearing brief that this Commission adopted BellSouth's effective date proposal based on the record in that proceeding. Sprint goes on to assert that the record in this proceeding is not the same as that developed in the BellSouth phase.

Although there is an absence of competing testimony from other parties in the record, Florida Digital Network states in its post-hearing brief that "the Commission should adhere to the approach that it utilized in the BellSouth phase."

B. DECISION

We note that although Sprint has proposed a 60-day effective date interval and that rates be effective the day they are filed, Sprint has also previously stated that this Commission should not deviate from the finding in the BellSouth phase. Specifically, in response to a discovery question regarding the outcome of this issue in Docket No. 990649A-TP, Sprint stated that "[t]he Commission should not deviate from that finding in this docket." Sprint reaffirms this position, adding a caveat in its post-hearing brief, stating that:

> Sprint-Florida is willing to comply with the Commission precedent established for BellSouth if the Commission were to allow either party to immediately submit the revised interconnection agreement to the Commission for approval with the rates to become retroactive to the 60th day after the Commission's Order is issued. (emphasis added)

We acknowledge and agree with Sprint's assertion that the record in this proceeding is not the same as the record developed in the BellSouth phase. Despite that fact, we find that there is no compelling reason to deviate from that finding here. Unlike other issues in this proceeding which are dependent on cost models and company-specific assumptions and inputs, we find that this issue is procedural in nature and should be applied uniformly among the companies associated with this docket. Although rates and charges may differ between phases and among companies in this docket, we believe that there should be a single standard applicable to effective dates. The "standard" developed in Docket No. 990649A-TP is already applicable to BellSouth, and should also apply to Sprint and Verizon going forward.

In Docket No. 990649A-TP, Order No. PSC-01-1181-FOF-TP, we stated:

> . . . UNE rates as established herein, may be incorporated as amendments to existing interconnection agreements. Therefore, upon consideration, we find that it is appropriate for the rates to become effective when the interconnection agreements are amended to reflect the approved UNE rates and the amended agreement is approved by us. For new interconnection agreements, the rates shall become effective when we approve the agreement. Pursuant to Section 252(e)(4) of the Telecommunications Act of 1996, should we fail to act to approve or reject the agreement adopted by negotiation within 90 days after submission by the parties, the agreement is deemed approved.

We see no reason to create an additional standard for the application of effective dates in this docket. We have already approved an effective process regarding the effective dates of charges and rates developed as a result of this UNE docket. The amendment and approval process we approved in the BellSouth phase provides time for proper notice of changing rates and charges and allows the parties to make the necessary changes to billing systems.

We find that recurring and non-recurring rates and charges shall take effect when existing interconnection agreements are amended to incorporate the approved rates, and the amended agreements are deemed approved by us. For new interconnection agreements, the rates shall become effective when the agreements are deemed approved by us. Pursuant to Section 252(e)(4) of the Telecommunications Act of 1996, a negotiated agreement is deemed approved by operation of law after 90 days from the date of submission to us.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that the findings set forth herein regarding the appropriate methodology, assumptions, and inputs for establishing rates for unbundled network elements for Sprint-Florida, Incorporated, are herein approved. It is further

ORDERED that the rates set forth in Appendices A-1 and B-1, which are attached and incorporated in this Order, are hereby approved. It is further

ORDERED that the approved rates shall become effective when existing interconnection agreement are amended to incorporate the approved rates, and those agreements become effective. It is further

ORDERED that Sprint-Florida, Incorporated shall file a report with this Commission within 60 days of the order in this docket becoming final, explaining when and how it will have an electronic loop qualification offering in place. It is further

ORDERED that this docket shall remain open until Sprint-Florida Incorporated files its report, thereafter, once the time for filing an appeal has run, the docket shall be administratively closed.

By ORDER of the Florida Public Service Commission this 8th Day of January, 2003.

BLANCA S. BAYÓ, Director
Division of the Commission Clerk
and Administrative Services

(S E A L)

PAC

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within fifteen (15) days of the issuance of this order in the form prescribed by Rule

25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water and/or wastewater utility by filing a notice of appeal with the Director, Division of the Commission Clerk and Administrative Services and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

RATE TABLES

Attached to this recommendation are two Appendices. Appendix A shows the rates proposed by Sprint and staff for UNEs and UNE combinations. Appendix B shows our assignment of wire centers to rate zones. Below is a brief description of the rate Appendix.

APPENDIX A - Appendix A contains the recurring and non-recurring rates proposed by Sprint-Florida and those approved by us. No other party to this proceeding made specific proposals regarding recurring and non-recurring rates.

Note: Appendix A also contains the Dedicated Interoffice Transport rate table which is included as a supplement to Sprint's proposed and our approved recurring rates.

Source of Rates

- Sprint Proposed - Recurring and Non-Recurring - Exhibit 1; Revised MRH-1 and MRH-2, and MRH-3 and MRH-4.
- Commission Approved - Recurring and Non-Recurring - Output of Sprint's cost models with our adjustments.

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
1	ALFRFLXARS0 - Alford	CTDLFLXARS0 - Cottondale	$40.43	$36.50	$140.67	$124.64	$2,005.87	$1,736.74	$5,415.68	$4,686.03	NA	NA
2	ALFRFLXARS0 - Alford	GDRGFLXADS0 - Grand Ridge	$44.72	$40.30	$209.60	$185.79	$2,969.76	$2,572.55	$8,016.71	$6,939.96	NA	NA
3	ALFRFLXARS0 - Alford	GNWDFLXARS0 - Greenwood	$44.41	$40.04	$204.63	$181.65	$2,830.67	$2,456.54	$7,636.19	$6,622.59	NA	NA
4	ALFRFLXARS0 - Alford	MALNFLXARS0 - Malone	$44.41	$40.04	$204.63	$181.65	$2,830.67	$2,456.54	$7,636.19	$6,622.59	NA	NA
5	ALFRFLXARS0 - Alford	MRNNFLXADS0 - Marianna	$40.43	$36.50	$140.67	$124.64	$2,005.87	$1,736.74	$5,415.68	$4,686.03	NA	NA
6	ALFRFLXARS0 - Alford	NSN - Graceville*	$26.15	$23.54	$165.81	$147.44	$2,226.71	$1,936.87	$6,001.89	$5,217.22	NA	NA
7	ALFRFLXARS0 - Alford	SNDSFLXARS0 - Sneads	$44.72	$40.30	$209.60	$185.79	$2,969.76	$2,572.55	$8,016.71	$6,939.96	NA	NA
8	ALSPFLXADS0 - Altamonte Springs	APPKFLXADS1 - Apopka	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
9	ALSPFLXADS0 - Altamonte Springs	CSLBFLXADS1 - Casselberry	$28.86	$26.11	$71.20	$63.04	$1,027.33	$888.72	$2,774.60	$2,398.69	$9,416.99	$8,119.61
10	ALSPFLXADS0 - Altamonte Springs	GLRDFLXADS0 - Goldenrod	$28.86	$26.11	$71.20	$63.04	$1,027.33	$888.72	$2,774.60	$2,398.69	$9,416.99	$8,119.61
11	ALSPFLXADS0 - Altamonte Springs	KSSMFLXBDS1 - Reedy Creek	$39.15	$35.02	$298.44	$259.86	$5,456.27	$4,646.43	$14,819.23	$12,613.70	$51,478.40	$43,732.39
12	ALSPFLXADS0 - Altamonte Springs	LKBRFLXADS1 - Lake Brantley	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
13	ALSPFLXADS0 - Altamonte Springs	MNTIFLXADS0 - Montverde	$47.35	$42.20	$479.55	$418.22	$8,594.36	$7,327.52	NA	NA	NA	NA
14	ALSPFLXADS0 - Altamonte Springs	MTLDFLXADS1 - Maitland	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
15	ALSPFLXADS0 - Altamonte Springs	NSN - Celebration*	$24.88	$22.10	$266.41	$231.31	$5,042.65	$4,285.52	$13,705.64	$11,642.64	NA	NA
16	ALSPFLXADS0 - Altamonte Springs	NSN - East Orange*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
17	ALSPFLXADS0 - Altamonte Springs	NSN - Geneva*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
18	ALSPFLXADS0 - Altamonte Springs	NSN - Lake Buena Vista*	$24.59	$21.86	$259.87	$225.86	$4,859.64	$4,132.88	$13,204.96	$11,225.04	NA	NA
19	ALSPFLXADS0 - Altamonte Springs	NSN - Orlando*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
20	ALSPFLXADS0 - Altamonte Springs	NSN - Oviedo*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
21	ALSPFLXADS0 - Altamonte Springs	NSN - Sanford*	$21.85	$19.72	$96.52	$85.99	$1,253.06	$1,092.93	NA	NA	NA	NA
22	ALSPFLXADS0 - Altamonte Springs	WNDRFLXARS0 - Windermere	$35.96	$32.20	$228.10	$197.54	$4,453.34	$3,778.06	$12,111.39	$10,270.68	$42,300.13	$35,811.89
23	ALSPFLXADS0 - Altamonte Springs	WNGRFLXADS0 - Winter Garden	$35.67	$31.95	$221.57	$192.09	$4,270.33	$3,625.42	$11,610.72	$9,853.09	$40,509.73	$34,318.56
24	ALSPFLXADS0 - Altamonte Springs	WNPKFLXADS1 - Winter Park	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
25	ALVAFLXARS0 - Alva	BNSPFLXADS1 - Bonita Springs	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
26	ALVAFLXARS0 - Alva	CPCRFLXADS0 - Cape Coral	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
27	ALVAFLXARS0 - Alva	CPCRFLXBDS1 - North Cape Coral	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
28	ALVAFLXARS0 - Alva	CYLKFLXBRS0 - Regional Airport	$42.18	$37.55	$365.39	$315.68	$7,330.30	$6,209.48	$19,946.16	$16,889.88	$69,812.08	$59,024.17
29	ALVAFLXARS0 - Alva	FTMBFLXADS0 - Fort Myers Beach	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
30	ALVAFLXARS0 - Alva	FTMYFLXADS0 - Fort Myers	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
31	ALVAFLXARS0 - Alva	FTMYFLXBDS0 - East Fort Myers	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
32	ALVAFLXARS0 - Alva	FTMYFLXCDS2 - South Fort Myers	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
33	ALVAFLXARS0 - Alva	LHACFLXADS0 - Lehigh Acres	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
34	ALVAFLXARS0 - Alva	NFMYFLXADS0 - North Fort Myers	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
35	ALVAFLXARS0 - Alva	PNISFLXADS0 - Pine Island	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
36	ALVAFLXARS0 - Alva	SNISFLXADS0 - Sanibel-Captiva Isl.	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
37	APPKFLXADS1 - Apopka	CSLBFLXADS1 - Casselberry	$32.51	$29.32	$151.82	$133.94	$2,318.20	$1,997.25	$6,270.17	$5,398.73	$21,412.15	$18,389.62
38	APPKFLXADS1 - Apopka	GLRDFLXADS0 - Goldenrod	$32.51	$29.32	$151.82	$133.94	$2,318.20	$1,997.25	$6,270.17	$5,398.73	$21,412.15	$18,389.62
39	APPKFLXADS1 - Apopka	KSSMFLXBDS1 - Reedy Creek	$35.50	$31.81	$217.82	$188.96	$4,165.40	$3,537.91	$11,323.66	$9,613.66	$39,483.24	$33,462.38
40	APPKFLXADS1 - Apopka	LKBRFLXADS1 - Lake Brantley	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
41	APPKFLXADS1 - Apopka	MNTIFLXADS0 - Montverde	$34.05	$30.60	$185.82	$162.29	$3,269.86	$2,790.98	NA	NA	NA	NA
42	APPKFLXADS1 - Apopka	MTDRFLXARS0 - Mt. Dora	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
43	APPKFLXADS1 - Apopka	MTLDFLXADS1 - Maitland	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
44	APPKFLXADS1 - Apopka	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
45	APPKFLXADS1 - Apopka	NSN - East Orange*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
46	APPKFLXADS1 - Apopka	NSN - Lake Buena Vista*	$20.46	$18.25	$168.88	$146.32	$3,278.39	$2,782.16	$8,914.98	$7,562.42	$31,122.33	$26,356.16
47	APPKFLXADS1 - Apopka	NSN - Orlando*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
48	APPKFLXADS1 - Apopka	WNDRFLXARS0 - Windermere	$32.31	$28.99	$147.48	$126.64	$3,162.47	$2,669.54	$8,615.82	$7,270.65	$30,304.97	$25,541.88
49	APPKFLXADS1 - Apopka	WNGRFLXADS0 - Winter Garden	$32.02	$28.74	$140.95	$121.19	$2,979.45	$2,516.90	$8,115.15	$6,853.05	$28,514.57	$24,048.54
50	APPKFLXADS1 - Apopka	WNPKFLXADS1 - Winter Park	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
51	ARCDFLXADS0 - Arcadia	PTCTFLXADS0 - Port Charlotte	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
52	ARCDFLXADS0 - Arcadia	WCHLFLXADS0 - Wauchula	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
53	ARCDFLXADS0 - Arcadia	ZLSPFLXARS0 - Zolfo Springs	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
54	ASTRFLXARS0 - Astor	CLMTFLXADS0 - Clermont	$43.71	$39.23	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
55	ASTRFLXARS0 - Astor	ESTSFLXARS0 - Eustis	$43.71	$39.23	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
56	ASTRFLXARS0 - Astor	GVLDFLXARS0 - Groveland	$58.16	$51.51	$425.71	$365.97	$9,018.89	$7,617.85	$24,565.74	$20,742.90	NA	NA
57	ASTRFLXARS0 - Astor	HOWYFLXARS0 - Howey-in-the-Hills	$47.74	$42.82	$258.16	$226.28	$4,328.92	$3,706.16	NA	NA	NA	NA
58	ASTRFLXARS0 - Astor	LDLKFLXARS0 - Lady Lake	$50.72	$45.30	$306.11	$266.25	$5,671.00	$4,825.53	$15,406.69	$13,103.68	NA	NA
59	ASTRFLXARS0 - Astor	LSBGFLXADS1 - Leesburg	$43.71	$39.23	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
60	ASTRFLXARS0 - Astor	MTDRFLXARS0 - Mt. Dora	$43.71	$39.23	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION

	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
61	ASTRFLXARS0 - Astor	MTVRFLXARS0 - Montverde	$47.46	$42.58	$253.63	$222.50	$4,202.03	$3,600.33	NA	NA	NA	NA
62	ASTRFLXARS0 - Astor	TVRSFLXADS0 - Tavares	$43.71	$39.23	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
63	ASTRFLXARS0 - Astor	UMTLFLXARS0 - Umatilla	$43.71	$39.23	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
64	AVPKFLXADS0 - Avon Park	LKPCFLXARS0 - Lake Placid	$41.33	$36.67	$346.49	$296.24	$7,767.06	$6,541.89	$21,176.98	$17,831.95	NA	NA
65	AVPKFLXADS0 - Avon Park	SBNGFLXADS1 - Sebring	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
66	AVPKFLXADS0 - Avon Park	SLHLFLXARS0 - Spring Lake	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
67	AVPKFLXADS0 - Avon Park	WCHLFLXADS0 - Wauchula	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
68	BAKRFLXADS0 - Baker	CRVWFLXADS0 - Crestview	$35.32	$32.01	$58.48	$52.43	$671.07	$591.58	NA	NA	NA	NA
69	BAKRFLXADS0 - Baker	DESTFLXADS0 - Destin	$46.35	$41.43	$235.86	$204.01	$4,670.51	$3,959.20	NA	NA	NA	NA
70	BAKRFLXADS0 - Baker	DFSPFLXADS0 - DeFuniak Springs	$46.35	$41.43	$235.86	$204.01	$4,670.51	$3,959.20	NA	NA	NA	NA
71	BAKRFLXADS0 - Baker	FTWBFLXADS0 - Fort Walton Beach	$46.35	$41.43	$235.86	$204.01	$4,670.51	$3,959.20	NA	NA	NA	NA
72	BAKRFLXADS0 - Baker	NSN - Laurel Hill*	$21.75	$19.64	$95.04	$84.75	$1,211.58	$1,058.33	NA	NA	NA	NA
73	BAKRFLXADS0 - Baker	SHLMFLXADS0 - Shalimar	$50.16	$44.83	$297.04	$258.69	$5,417.23	$4,613.87	NA	NA	NA	NA
74	BAKRFLXADS0 - Baker	VLPRFLXADS0 - Valparaiso	$46.35	$41.43	$235.86	$204.01	$4,670.51	$3,959.20	NA	NA	NA	NA
75	BCGRFLXARS1 - Boca Grande	CPHZFLXADS0 - Cape Haze	$36.25	$32.78	$73.38	$64.86	$1,088.34	$939.60	$2,941.49	$2,537.89	NA	NA
76	BCGRFLXARS1 - Boca Grande	NSN - Englewood*	$22.27	$20.08	$103.41	$91.73	$1,445.84	$1,253.71	NA	NA	NA	NA
77	BCGRFLXARS1 - Boca Grande	PNGRFLXADS1 - Punta Gorda	$53.97	$47.78	$358.26	$306.06	$8,096.48	$6,816.65	$22,078.19	$18,583.63	NA	NA
78	BCGRFLXARS1 - Boca Grande	PTCTFLXADS0 - Port Charlotte	$36.25	$32.78	$73.38	$64.86	$1,088.34	$939.60	$2,941.49	$2,537.89	NA	NA
79	BLVWFLXADS0 - Belleview	LDLKFLXARS0 - Lady Lake (821)	$36.21	$32.41	$233.60	$202.12	$4,607.07	$3,906.28	$12,531.96	$10,621.46	$43,804.07	$37,066.30
80	BLVWFLXADS0 - Belleview	NSN - Citra*	$24.97	$22.01	$268.26	$229.18	$6,060.16	$5,102.31	NA	NA	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
81	BLVWFLXADS0 - Belleview	NSN - Dunnellon*	$24.56	$21.67	$259.37	$221.76	$5,811.26	$4,894.72	$15,844.35	$13,341.95	$55,901.44	$47,023.96
82	BLVWFLXADS0 - Belleview	NSN - McIntosh*	$24.97	$22.01	$268.26	$229.18	$6,060.16	$5,102.31	NA	NA	NA	NA
83	BLVWFLXADS0 - Belleview	NSN - Orange Springs*	$20.82	$18.55	$176.81	$152.93	$3,500.44	$2,967.36	NA	NA	NA	NA
84	BLVWFLXADS0 - Belleview	OCALFLXADS0 - Ocala	$36.16	$32.20	$232.39	$197.44	$5,539.17	$4,651.84	$15,117.94	$12,693.83	$53,556.27	$44,935.36
85	BLVWFLXADS0 - Belleview	OCALFLXCRS0 - Highlands	$40.67	$36.13	$332.11	$284.25	$7,364.44	$6,206.08	$20,075.49	$16,913.24	$70,779.40	$59,565.92
86	BLVWFLXADS0 - Belleview	OCNFFLXARS0 - Forest	$40.67	$36.13	$332.11	$284.25	$7,364.44	$6,206.08	$20,075.49	$16,913.24	$70,779.40	$59,565.92
87	BLVWFLXADS0 - Belleview	OKLWFLXADS0 - Ocklawaha	$28.36	$25.69	$60.22	$53.89	$719.88	$632.28	$1,933.46	$1,697.13	$6,409.12	$5,610.80
88	BLVWFLXADS0 - Belleview	SSPRFLXARS0 - Salt Springs	$40.67	$36.13	$332.11	$284.25	$7,364.44	$6,206.08	$20,075.49	$16,913.24	$70,779.40	$59,565.92
89	BLVWFLXADS0 - Belleview	SVSSFLXARS0 - Silver Springs Shores	$29.48	$26.63	$84.98	$74.53	$1,412.88	$1,210.29	$3,829.35	$3,278.43	$13,188.76	$11,265.57
90	BLVWFLXADS0 - Belleview	WLWDFLXARS0 - Wildwood	$30.74	$27.68	$112.79	$97.72	$2,191.29	$1,859.52	$5,958.90	$5,054.61	$20,803.92	$17,617.24
91	BNFYFLXARS0 - Bonifay	DFSPFLXADS0 - DeFuniak Springs	$34.35	$30.85	$192.45	$167.81	$3,455.32	$2,945.66	$9,381.04	$7,993.39	$32,536.49	$27,668.23
92	BNFYFLXARS0 - Bonifay	NSN - Chipley*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA
93	BNFYFLXARS0 - Bonifay	NSN - Graceville*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA
94	BNFYFLXARS0 - Bonifay	NSN - Vernon*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA
95	BNFYFLXARS0 - Bonifay	PNLNFLXARS0 - Ponce de Leon	$37.08	$33.30	$252.76	$221.77	$4,177.63	$3,579.98	NA	NA	NA	NA
96	BNFYFLXARS0 - Bonifay	RYHLFLXARS0 - Reynolds Hill	$32.19	$29.06	$144.85	$128.12	$2,122.99	$1,834.43	NA	NA	NA	NA
97	BNFYFLXARS0 - Bonifay	WSTVFLXARS0 - Westville	$29.63	$26.75	$88.29	$77.29	$1,505.60	$1,287.63	$4,083.03	$3,490.01	$14,095.90	$12,022.20
98	BNSPFLXADS1 - Bonita Springs	CYLKFLXADS0 - Cypress Lake	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
99	BNSPFLXADS1 - Bonita Springs	FTMBFLXADS0 - Fort Myers Beach	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
100	BNSPFLXADS1 - Bonita Springs	FTMDFLXARS0 - Fort Meade	$50.90	$44.82	$557.96	$476.24	$12,720.60	$10,705.28	$34,692.75	$29,189.48	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
101	BNSPFLXADS1 - Bonita Springs	FTMYFLXADS0 - Fort Myers	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
102	BNSPFLXADS1 - Bonita Springs	FTMYFLXBDS0 - East Fort Myers	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
103	BNSPFLXADS1 - Bonita Springs	GLGCFLXADS0 - Golden Gate	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
104	BNSPFLXADS1 - Bonita Springs	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
105	BNSPFLXADS1 - Bonita Springs	NPLSFLXCDS0 - Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
106	BNSPFLXADS1 - Bonita Springs	NPLSFLXCDS0 - Naples Moorings	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
107	BNSPFLXADS1 - Bonita Springs	NPLSFLXCDS0 - Naples Southeast	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
108	BSHNFLXADS0 - Bushnell	HOWYFLXARS0 - Howey-in-the-Hills	$39.09	$34.81	$297.24	$255.18	$6,388.38	$5,391.99	NA	NA	NA	NA
109	BSHNFLXADS0 - Bushnell	LSBGFLXADS1 - Leesburg	$36.16	$32.20	$232.39	$197.44	$5,539.17	$4,651.84	$15,117.94	$12,693.83	$53,556.27	$44,935.36
110	BSHNFLXADS0 - Bushnell	WLWDFLXARS0 - Wildwood	$41.27	$36.62	$345.18	$295.15	$7,730.46	$6,511.36	$21,076.84	$17,748.44	$74,360.19	$62,552.60
111	BVHLFLXADS0 - Beverly Hills	CHSWFLXARS0 - Chassahowitzka	$42.95	$38.19	$382.30	$329.78	$7,803.69	$6,604.32	$21,241.24	$17,970.06	NA	NA
112	BVHLFLXADS0 - Beverly Hills	CRRVFLXADS0 - Crystal River	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
113	BVHLFLXADS0 - Beverly Hills	HMSPFLXARS0 - Homosassa Springs	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
114	BVHLFLXADS0 - Beverly Hills	INVRFLXADS0 - Inverness	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
115	BVHLFLXADS0 - Beverly Hills	NSN - Dunnellon*	$14.04	$12.73	$26.97	$24.33	$272.09	$242.87	$726.41	$648.12	$2,345.17	$2,088.60
116	BWLGFLXARS0 - Bowling Green	FTMDFLXARS0 - Fort Meade	$53.51	$47.40	$350.94	$299.95	$7,891.51	$6,645.69	$21,517.44	$18,115.92	NA	NA
117	BWLGFLXARS0 - Bowling Green	WCHLFLXADS0 - Wauchula	$53.51	$47.40	$350.94	$299.95	$7,891.51	$6,645.69	$21,517.44	$18,115.92	NA	NA
118	BWLGFLXARS0 - Bowling Green	ZLSPFLXARS0 - Zolfo Springs	$53.51	$47.40	$350.94	$299.95	$7,891.51	$6,645.69	$21,517.44	$18,115.92	NA	NA
119	CFVLFLXADS0 - Crawfordville	NSN - Alligator Point*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
120	CFVLFLXADS0 - Crawfordville	NSN - Carrabelle*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
121	CFVLFLXADS0 - Crawfordville	PANCFLXARS0 - Panacea	$28.49	$25.81	$63.18	$56.36	$802.84	$701.48	$2,160.43	$1,886.44	$7,220.77	$6,287.78
122	CFVLFLXADS0 - Crawfordville	SPCPFLXADS0 - Sopchoppy	$30.16	$27.19	$99.89	$86.96	$1,830.14	$1,558.31	$4,970.90	$4,230.55	$17,270.87	$14,670.38
123	CFVLFLXADS0 - Crawfordville	STMKFLXARS0 - St. Marks	$28.36	$25.69	$60.22	$53.89	$719.88	$632.28	$1,933.46	$1,697.13	$6,409.12	$5,610.80
124	CFVLFLXADS0 - Crawfordville	TLHSFLXADS0 - Calhoun	$30.16	$27.19	$99.89	$86.96	$1,830.14	$1,558.31	$4,970.90	$4,230.55	$17,270.87	$14,670.38
125	CHLKFLXARS0 - Cherry Lake	GNVLFLXARS0 - Greenville	$54.26	$48.26	$363.03	$313.71	$7,264.42	$6,154.53	$19,765.92	$16,739.55	NA	NA
126	CHLKFLXARS0 - Cherry Lake	LEE FLXARS0 - Lee	$39.30	$35.55	$122.36	$109.37	$1,493.43	$1,309.34	NA	NA	NA	NA
127	CHLKFLXARS0 - Cherry Lake	MDSNFLXADS0 - Madison	$35.80	$32.40	$66.15	$58.83	$885.81	$770.68	$2,387.41	$2,075.75	NA	NA
128	CHSWFLXARS0 - Chassahowitzka	CRRVFLXADS0 - Crystal River	$55.46	$49.25	$382.30	$329.78	$7,803.69	$6,604.32	$21,241.24	$17,970.06	NA	NA
129	CHSWFLXARS0 - Chassahowitzka	HMSPFLXARS0- Homosassa Springs	$55.46	$49.25	$382.30	$329.78	$7,803.69	$6,604.32	$21,241.24	$17,970.06	NA	NA
130	CHSWFLXARS0 - Chassahowitzka	INVRFLXADS0 - Inverness	$55.46	$49.25	$382.30	$329.78	$7,803.69	$6,604.32	$21,241.24	$17,970.06	NA	NA
131	CLMTFLXADS0 - Clermont	ESTSFLXARS0 - Eustis	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
132	CLMTFLXADS0 - Clermont	GVLDFLXARS0 - Groveland	$36.16	$32.20	$232.39	$197.44	$5,539.17	$4,651.84	$15,117.94	$12,693.83	$53,556.27	$44,935.36
133	CLMTFLXADS0 - Clermont	HOWYFLXARS0 - Howey-in-the-Hills	$34.25	$30.78	$190.36	$166.07	$3,396.75	$2,896.81	NA	NA	NA	NA
134	CLMTFLXADS0 - Clermont	KSSMFLXBDS1 - Reedy Creek	$29.11	$26.32	$76.87	$67.77	$1,185.94	$1,021.01	$3,208.52	$2,760.61	$10,968.67	$9,413.83
135	CLMTFLXADS0 - Clermont	LDLKFLXARS0 - Lady Lake	$36.43	$32.59	$238.30	$206.04	$4,738.83	$4,016.19	$12,892.45	$10,922.13	$45,093.15	$38,141.50
136	CLMTFLXADS0 - Clermont	LSBGFLXADS1 - Leesburg	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
137	CLMTFLXADS0 - Clermont	MNTIFLXADS0 - Montverde	$33.15	$29.77	$165.91	$143.85	$3,195.42	$2,712.96	$8,688.01	$7,373.11	$30,310.68	$25,679.18
138	CLMTFLXADS0 - Clermont	MTDRFLXARS0 - Mt. Dora	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
139	CLMTFLXADS0 - Clermont	NSN - Celebration*	$24.71	$21.96	$262.66	$228.19	$4,937.72	$4,198.00	$13,418.58	$11,403.21	NA	NA
140	CLMTFLXADS0 - Clermont	NSN - Lake Buena Vista*	$17.56	$15.83	$104.80	$92.90	$1,484.88	$1,286.27	$4,008.35	$3,469.98	$13,576.43	$11,721.45

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
141	CLMTFLXADS0 - Clermont	NSN - Orlando*	$24.72	$21.97	$262.92	$228.41	$4,945.04	$4,204.11	$13,438.61	$11,419.92	$46,793.78	$39,692.50
142	CLMTFLXADS0 - Clermont	TVRSFLXADS0 - Tavares	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
143	CLMTFLXADS0 - Clermont	UMTLFLXARS0 - Umatilla	$34.39	$30.89	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
144	CLMTFLXADS0 - Clermont	WNDRFLXARS0 - Windermere	$35.79	$32.06	$224.36	$194.41	$4,348.41	$3,690.55	$11,824.34	$10,031.26	$41,273.64	$34,955.71
145	CLMTFLXADS0 - Clermont	WNGRFLXADS0 - Winter Garden	$35.50	$31.81	$217.82	$188.96	$4,165.40	$3,537.91	$11,323.66	$9,613.66	$39,483.24	$33,462.38
146	CLTNFLXARS0 - Clewiston	LBLLFLXADS0 - LaBelle	$38.94	$35.03	$116.71	$100.99	$2,301.09	$1,951.11	$6,259.30	$5,305.16	NA	NA
147	CLTNFLXARS0 - Clewiston	MRHNFLXARS0 - Moore Haven	$38.94	$35.03	$116.71	$100.99	$2,301.09	$1,951.11	$6,259.30	$5,305.16	NA	NA
148	CPCRFLXADS0 - Cape Coral	CPCRFLXBDS1 - North Cape Coral	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
149	CPCRFLXADS0 - Cape Coral	FTMBFLXADS0 - Fort Myers Beach	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
150	CPCRFLXADS0 - Cape Coral	FTMYFLXADS0 - Fort Myers	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
151	CPCRFLXADS0 - Cape Coral	FTMYFLXBDS0 - East Fort Myers	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
152	CPCRFLXADS0 - Cape Coral	LHACFLXADS0 - Lehigh Acres	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
153	CPCRFLXADS0 - Cape Coral	NFMYFLXADS0 - North Fort Myers	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
154	CPCRFLXADS0 - Cape Coral	PNGRFLXADS1 - Punta Gorda	$41.97	$37.20	$360.61	$308.02	$8,162.37	$6,871.60	$22,258.44	$18,733.96	$78,585.53	$66,076.87
155	CPCRFLXADS0 - Cape Coral	PNISFLXADS0 - Pine Island	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
156	CPCRFLXADS0 - Cape Coral	SNISFLXADS0 - Sanibel-Captiva Isl.	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
157	CPCRFLXBDS1 - North Cape Coral	NFMYFLXADS0 - North Fort Myers	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
158	CPCRFLXBDS1 - North Cape Coral	PNGRFLXADS1 - Punta Gorda	$41.97	$37.20	$360.61	$308.02	$8,162.37	$6,871.60	$22,258.44	$18,733.96	$78,585.53	$66,076.87
159	CPCRFLXBDS1 - North Cape Coral	PNISFLXADS0 - Pine Island	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
160	CPCRFLXBDS1 - North Cape Coral	PNISFLXADS0 - Pine Island	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
161	CPCRFLXBDS1 - North Cape Coral	SNISFLXADS0 - Sanibel-Captiva Isl.	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
162	CPCRFLXBDS1 - North Cape Coral	SNISFLXADS0 - Sanibel-Captiva Isl.	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
163	CPHZFLXADS0 - Cape Haze	NSN - Englewood*	$17.71	$16.04	$30.02	$26.87	$357.50	$314.11	NA	NA	NA	NA
164	CPHZFLXADS0 - Cape Haze	PNGRFLXADS1 - Punta Gorda	$53.97	$47.78	$358.26	$306.06	$8,096.48	$6,816.65	$22,078.19	$18,583.63	NA	NA
165	CPHZFLXADS0 - Cape Haze	PTCTFLXADS0 - Port Charlotte	$36.25	$32.78	$73.38	$64.86	$1,088.34	$939.60	$2,941.49	$2,537.89	NA	NA
166	CRRVFLXADS0 - Crystal River	HMSPFLXARS0 - Homosassa Springs	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
167	CRRVFLXADS0 - Crystal River	INVRFLXADS0 - Inverness	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
168	CRRVFLXADS0 - Crystal River	NSN - Yankeetown*	$18.30	$16.45	$121.10	$106.49	$1,941.19	$1,666.86	$5,256.71	$4,511.19	$18,040.49	$15,444.84
169	CRVWFLXADS0 - Crestview	DESTFLXADS0 - Destin	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
170	CRVWFLXADS0 - Crestview	DFSPFLXADS0 - DeFuniak Springs	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
171	CRVWFLXADS0 - Crestview	FTWBFLXADS0 - Fort Walton Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
172	CRVWFLXADS0 - Crestview	NSN - Laurel Hill*	$18.12	$16.38	$36.56	$32.32	$540.51	$466.75	NA	NA	NA	NA
173	CRVWFLXADS0 - Crestview	SHLMFLXADS0 - Shalimar	$36.44	$32.60	$238.56	$206.26	$4,746.15	$4,022.29	$12,912.48	$10,938.84	$45,164.77	$38,201.24
174	CRVWFLXADS0 - Crestview	VLPRFLXADS0 - Valparaiso	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
175	CSLBFLXADS1 - Casselberry	GLRDFLXADS0 - Goldenrod	$28.86	$26.11	$71.20	$63.04	$1,027.33	$888.72	$2,774.60	$2,398.69	$9,416.99	$8,119.61
176	CSLBFLXADS1 - Casselberry	KSSMFLXBDS1 - Reedy Creek	$38.72	$34.67	$289.02	$252.01	$5,192.73	$4,426.63	$14,098.26	$12,012.36	$48,900.23	$41,581.98
177	CSLBFLXADS1 - Casselberry	LKBRFLXADS1 - Lake Brantley	$32.51	$29.32	$151.82	$133.94	$2,318.20	$1,997.25	$6,270.17	$5,398.73	$21,412.15	$18,389.62
178	CSLBFLXADS1 - Casselberry	MNTIFLXADS0 - Montverde	$46.93	$41.84	$470.14	$410.37	$8,330.83	$7,107.71	NA	NA	NA	NA
179	CSLBFLXADS1 - Casselberry	MTLDFLXADS1 - Maitland	$32.51	$29.32	$151.82	$133.94	$2,318.20	$1,997.25	$6,270.17	$5,398.73	$21,412.15	$18,389.62
180	CSLBFLXADS1 - Casselberry	NSN - Celebration*	$24.46	$21.75	$256.99	$223.46	$4,779.11	$4,065.71	$12,984.66	$11,041.30	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
181	CSLBFLXADS1 - Casselberry	NSN - East Orange*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
182	CSLBFLXADS1 - Casselberry	NSN - Geneva*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
183	CSLBFLXADS1 - Casselberry	NSN - Lake Buena Vista*	$23.69	$21.11	$240.08	$209.36	$4,305.72	$3,670.88	$11,689.58	$9,961.12	$40,539.32	$34,475.77
184	CSLBFLXADS1 - Casselberry	NSN - Orlando*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
185	CSLBFLXADS1 - Casselberry	NSN - Oviedo*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
186	CSLBFLXADS1 - Casselberry	NSN - Sanford*	$20.41	$18.38	$167.72	$149.04	$2,280.40	$1,981.65	NA	NA	NA	NA
187	CSLBFLXADS1 - Casselberry	WNDRFLXARS0 - Windermere	$35.54	$31.85	$218.69	$189.69	$4,189.80	$3,558.26	$11,390.42	$9,669.34	$39,721.96	$33,661.49
188	CSLBFLXADS1 - Casselberry	WNGRFLXADS0 - Winter Garden	$35.24	$31.60	$212.15	$184.24	$4,006.79	$3,405.62	$10,889.74	$9,251.75	$37,931.56	$32,168.15
189	CSLBFLXADS1 - Casselberry	WNPKFLXADS1 - Winter Park	$28.86	$26.11	$71.20	$63.04	$1,027.33	$888.72	$2,774.60	$2,398.69	$9,416.99	$8,119.61
190	CTDLFLXARS0 - Cottondale	GDRGFLXADS0 - Grand Ridge	$32.75	$29.52	$157.23	$138.45	$2,469.49	$2,123.43	$6,684.06	$5,743.94	NA	NA
191	CTDLFLXARS0 - Cottondale	GNWDFLXARS0 - Greenwood	$32.53	$29.34	$152.26	$134.30	$2,330.41	$2,007.42	$6,303.55	$5,426.57	NA	NA
192	CTDLFLXARS0 - Cottondale	MALNFLXARS0 - Malone	$32.53	$29.34	$152.26	$134.30	$2,330.41	$2,007.42	$6,303.55	$5,426.57	NA	NA
193	CTDLFLXARS0 - Cottondale	MRNNFLXADS0 - Marianna	$29.63	$26.75	$88.29	$77.29	$1,505.60	$1,287.63	$4,083.03	$3,490.01	$14,095.90	$12,022.20
194	CTDLFLXARS0 - Cottondale	NSN - Chipley*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA
195	CTDLFLXARS0 - Cottondale	NSN - Graceville*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA
196	CTDLFLXARS0 - Cottondale	SNDSFLXARS0 - Sneads	$32.75	$29.52	$157.23	$138.45	$2,469.49	$2,123.43	$6,684.06	$5,743.94	NA	NA
197	CYLKFLXADS0 - Cypress Lake	CPCRFLXBDS1 - North Cape Coral	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
198	CYLKFLXADS0 - Cypress Lake	CYLKFLXBRS0 - Regional Airport	$34.71	$31.16	$200.47	$174.50	$3,679.81	$3,132.90	$9,995.20	$8,505.64	$34,732.72	$29,500.05
199	CYLKFLXADS0 - Cypress Lake	FTMBFLXADS0 - Fort Myers Beach	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
200	CYLKFLXADS0 - Cypress Lake	FTMYFLXADS0 - Fort Myers	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
201	CYLKFLXADS0 - Cypress Lake	FTMYFLXBDS0 - East Fort Myers	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
202	CYLKFLXADS0 - Cypress Lake	FTMYFLXCDS2 - South Fort Myers	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
203	CYLKFLXADS0 - Cypress Lake	LHACFLXADS0 - Lehigh Acres	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
204	CYLKFLXADS0 - Cypress Lake	NFMYFLXADS0 - North Fort Myers	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
205	CYLKFLXADS0 - Cypress Lake	PNISFLXADS0 - Pine Island	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
206	CYLKFLXADS0 - Cypress Lake	SNISFLXADS0 - Sanibel-Captiva Isl.	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
207	CYLKFLXBRS0 - Regional Airport	FTMYFLXCDS2 - South Fort Myers	$34.71	$31.16	$200.47	$174.50	$3,679.81	$3,132.90	$9,995.20	$8,505.64	$34,732.72	$29,500.05
208	DDCYFLXADS1 - Dade City	NSN - Tampa-Central*	$17.54	$15.90	$27.23	$24.54	$279.41	$248.98	NA	NA	NA	NA
209	DDCYFLXADS1 - Dade City	NSN - Tampa-North*	$17.54	$15.90	$27.23	$24.54	$279.41	$248.98	NA	NA	NA	NA
210	DDCYFLXADS1 - Dade City	NSN - Zephryhills*	$17.54	$15.90	$27.23	$24.54	$279.41	$248.98	NA	NA	NA	NA
211	DDCYFLXADS1 - Dade City	SNANFLXARS0 - San Antonio	$28.87	$26.12	$71.55	$63.34	$1,037.09	$896.86	$2,801.30	$2,420.97	$9,512.48	$8,199.25
212	DDCYFLXADS1 - Dade City	TLCHFLXARS0 - Trilacoochee	$28.87	$26.12	$71.55	$63.34	$1,037.09	$896.86	$2,801.30	$2,420.97	$9,512.48	$8,199.25
213	DESTFLXADS0 - Destin	DFSPFLXADS0 - DeFuniak Springs	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
214	DESTFLXADS0 - Destin	FRPTFLXARS0 - Freeport	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
215	DESTFLXADS0 - Destin	FTWBFLXADS0 - Fort Walton Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
216	DESTFLXADS0 - Destin	GLDLFLXARS0 - Glendale	$36.41	$32.57	$237.87	$205.68	$4,726.63	$4,006.01	$12,859.07	$10,894.29	$44,973.79	$38,041.95
217	DESTFLXADS0 - Destin	PNLNFLXARS0 - Ponce de Leon	$36.40	$32.56	$237.69	$205.53	$4,721.75	$4,001.94	NA	NA	NA	NA
218	DESTFLXADS0 - Destin	SGBHFLXARS0 - Seagrove Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
219	DESTFLXADS0 - Destin	SHLMFLXADS0 - Shalimar	$36.44	$32.60	$238.56	$206.26	$4,746.15	$4,022.29	$12,912.48	$10,938.84	$45,164.77	$38,201.24
220	DESTFLXADS0 - Destin	SNRSFLXARS0 - Santa Rosa Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
221	DESTFLXADS0 - Destin	VLPRFLXADS0 - Valparaiso	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
222	DFSPFLXADS0 - DeFuniak Springs	FRPTFLXARS0 - Freeport	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
223	DFSPFLXADS0 - DeFuniak Springs	FTWBFLXADS0 - Fort Walton Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
224	DFSPFLXADS0 - DeFuniak Springs	GLDLFLXARS0 - Glendale	$28.37	$25.70	$60.48	$54.10	$727.20	$638.39	$1,953.49	$1,713.84	$6,480.74	$5,670.53
225	DFSPFLXADS0 - DeFuniak Springs	NSN - Paxton*	$22.51	$19.96	$213.95	$183.90	$4,539.95	$3,834.37	NA	NA	NA	NA
226	DFSPFLXADS0 - DeFuniak Springs	PNLNFLXARS0 - Ponce de Leon	$35.44	$32.10	$60.31	$53.96	$722.32	$634.32	NA	NA	NA	NA
227	DFSPFLXADS0 - DeFuniak Springs	RYHLFLXARS0 - Reynolds Hill	$36.91	$33.16	$249.01	$218.64	$4,072.70	$3,492.47	NA	NA	NA	NA
228	DFSPFLXADS0 - DeFuniak Springs	SGBHFLXARS0 - Seagrove Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
229	DFSPFLXADS0 - DeFuniak Springs	SHLMFLXADS0 - Shalimar	$36.44	$32.60	$238.56	$206.26	$4,746.15	$4,022.29	$12,912.48	$10,938.84	$45,164.77	$38,201.24
230	DFSPFLXADS0 - DeFuniak Springs	SNRSFLXARS0 - Santa Rosa Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
231	DFSPFLXADS0 - DeFuniak Springs	VLPRFLXADS0 - Valparaiso	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
232	DFSPFLXADS0 - DeFuniak Springs	WSTVFLXARS0 - Westville	$34.35	$30.85	$192.45	$167.81	$3,455.32	$2,945.66	$9,381.04	$7,993.39	$32,536.49	$27,668.23
233	ESTSFLXARS0 - Eustis	GVLDFLXARS0 - Groveland	$41.63	$36.92	$353.20	$301.84	$7,954.95	$6,698.60	$21,691.00	$18,260.69	$76,556.41	$64,384.42
234	ESTSFLXARS0 - Eustis	HOWYFLXARS0 - Howey-in-the-Hills	$34.04	$30.60	$185.65	$162.14	$3,264.98	$2,786.91	NA	NA	NA	NA
235	ESTSFLXARS0 - Eustis	LDLKFLXARS0 - Lady Lake	$36.21	$32.41	$233.60	$202.12	$4,607.07	$3,906.28	$12,531.96	$10,621.46	$43,804.07	$37,066.30
236	ESTSFLXARS0 - Eustis	LSBGFLXADS1 - Leesburg	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
237	ESTSFLXARS0 - Eustis	MTDRFLXARS0 - Mt. Dora	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
238	ESTSFLXARS0 - Eustis	MTVRFLXARS0 - Montverde	$33.84	$30.43	$181.12	$158.36	$3,138.10	$2,681.08	NA	NA	NA	NA
239	ESTSFLXARS0 - Eustis	TVRSFLXADS0 - Tavares	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
240	ESTSFLXARS0 - Eustis	UMTLFLXARS0 - Umatilla	$34.39	$30.89	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
241	EVRGFLXARS0 - Everglades	NPLSFLXCDS0 - Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
242	FRPTFLXARS0 - Freeport	GLDLFLXARS0 - Glendale	$36.41	$32.57	$237.87	$205.68	$4,726.63	$4,006.01	$12,859.07	$10,894.29	$44,973.79	$38,041.95
243	FRPTFLXARS0 - Freeport	PNLNFLXARS0 - Ponce de Leon	$36.40	$32.56	$237.69	$205.53	$4,721.75	$4,001.94	NA	NA	NA	NA
244	FRPTFLXARS0 - Freeport	SGBHFLXARS0 - Seagrove Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
245	FRPTFLXARS0 - Freeport	SNRSFLXARS0 - Santa Rosa Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
246	FRPTFLXARS0 - Freeport	VLPRFLXADS0 - Valparaiso	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
247	FTMBFLXADS0 - Fort Myers Beach	CPCRFLXBDS1 - North Cape Coral	$34.40	$30.90	$193.58	$168.76	$3,487.04	$2,972.12	$9,467.82	$8,065.77	$32,846.83	$27,927.07
248	FTMBFLXADS0 - Fort Myers Beach	NFMYFLXADS0 - North Fort Myers	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
249	FTMBFLXADS0 - Fort Myers Beach	NNPLFLXADS1 - North Naples	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
250	FTMBFLXADS0 - Fort Myers Beach	NPLSFLXCDS0 - Naples	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
251	FTMBFLXADS0 - Fort Myers Beach	PNISFLXADS0 - Pine Island	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
252	FTMBFLXADS0 - Fort Myers Beach	SNISFLXADS0 - Sanibel-Captiva Isl.	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
253	FTMDFLXARS0 - Fort Meade	NSN - Bartow*	$39.77	$34.89	$384.71	$329.95	$8,353.93	$7,047.31	$22,764.54	$19,198.34	NA	NA
254	FTMDFLXARS0 - Fort Meade	NSN - Lakeland*	$39.77	$34.89	$384.71	$329.95	$8,353.93	$7,047.31	$22,764.54	$19,198.34	NA	NA
255	FTMYFLXADS0 - Fort Myers	CPCRFLXBDS1 - North Cape Coral	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
256	FTMYFLXADS0 - Fort Myers	FTMBFLXADS0 - Fort Myers Beach	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
257	FTMYFLXADS0 - Fort Myers	IMKLFLXARS0 - Immokalee	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
258	FTMYFLXADS0 - Fort Myers	LBLLFLXADS0 - LaBelle	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
259	FTMYFLXADS0 - Fort Myers	LHACFLXADS0 - Lehigh Acres	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
260	FTMYFLXADS0 - Fort Myers	NFMYFLXADS0 - North Fort Myers	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
261	FTMYFLXADS0 - Fort Myers	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
262	FTMYFLXADS0 - Fort Myers	NPLSFLXCDS0 - Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
263	FTMYFLXADS0 - Fort Myers	PNGRFLXADS1 - Punta Gorda	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
264	FTMYFLXADS0 - Fort Myers	PNISFLXADS0 - Pine Island	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
265	FTMYFLXADS0 - Fort Myers	SNISFLXADS0 - Sanibel-Captiva Isl.	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
266	FTMYFLXBDS0 - East Fort Myers	CPCRFLXBDS1 - North Cape Coral	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
267	FTMYFLXBDS0 - East Fort Myers	CYLKFLXBRS0 - Regional Airport	$38.75	$34.52	$289.65	$248.85	$6,176.08	$5,214.93	$16,824.43	$14,201.65	$59,153.75	$49,869.18
268	FTMYFLXBDS0 - East Fort Myers	FTMBFLXADS0 - Fort Myers Beach	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
269	FTMYFLXBDS0 - East Fort Myers	FTMYFLXADS0 - Fort Myers	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
270	FTMYFLXBDS0 - East Fort Myers	FTMYFLXCDS2 - South Fort Myers	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
271	FTMYFLXBDS0 - East Fort Myers	LHACFLXADS0 - Lehigh Acres	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
272	FTMYFLXBDS0 - East Fort Myers	NFMYFLXADS0 - North Fort Myers	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
273	FTMYFLXBDS0 - East Fort Myers	PNISFLXADS0 - Pine Island	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
274	FTMYFLXBDS0 - East Fort Myers	SNISFLXADS0 - Sanibel-Captiva Isl.	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
275	FTWBFLXADS0 - Fort Walton Beach	FRPTFLXARS0 - Freeport	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
276	FTWBFLXADS0 - Fort Walton Beach	NSN - Holley-Navarre*	$13.96	$12.66	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	$1,843.86	$1,670.46
277	FTWBFLXADS0 - Fort Walton Beach	NSN - Niceville*	$25.15	$22.33	$272.34	$236.26	$5,208.58	$4,423.91	$14,159.58	$12,021.26	$49,371.95	$41,842.90
278	FTWBFLXADS0 - Fort Walton Beach	SGBHFLXARS0 - Seagrove Beach	$36.44	$32.60	$238.56	$206.26	$4,746.15	$4,022.29	$12,912.48	$10,938.84	$45,164.77	$38,201.24
279	FTWBFLXADS0 - Fort Walton Beach	SHLMFLXADS0 - Shalimar	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
280	FTWBFLXADS0 - Fort Walton Beach	SNRSFLXARS0 - Santa Rosa Beach	$36.44	$32.60	$238.56	$206.26	$4,746.15	$4,022.29	$12,912.48	$10,938.84	$45,164.77	$38,201.24

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
281	FTWBFLXADS0 - Fort Walton Beach	VLPRFLXADS0 - Valparaiso	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
282	GDRGFLXADS0 - Grand Ridge	GNWDFLXARS0 - Greenwood	$39.95	$36.09	$132.91	$118.17	$1,788.69	$1,555.61	$4,821.54	$4,190.48	NA	NA
283	GDRGFLXADS0 - Grand Ridge	MALNFLXARS0 - Malone	$39.95	$36.09	$132.91	$118.17	$1,788.69	$1,555.61	$4,821.54	$4,190.48	NA	NA
284	GDRGFLXADS0 - Grand Ridge	MRNNFLXADS0 - Marianna	$35.97	$32.55	$68.94	$61.15	$963.89	$835.81	$2,601.03	$2,253.93	NA	NA
285	GDRGFLXADS0 - Grand Ridge	NSN - Graceville*	$21.69	$19.59	$94.08	$83.96	$1,184.74	$1,035.94	$3,187.24	$2,785.12	NA	NA
286	GDRGFLXADS0 - Grand Ridge	SNDSFLXARS0 - Sneads	$35.97	$32.55	$68.94	$61.15	$963.89	$835.81	$2,601.03	$2,253.93	NA	NA
287	GLDLFLXARS0 - Glendale	NSN - Paxton*	$25.25	$22.41	$274.43	$238.00	$5,267.14	$4,472.76	NA	NA	NA	NA
288	GLDLFLXARS0 - Glendale	PNLNFLXARS0 - Ponce de Leon	$31.10	$28.15	$120.79	$108.06	$1,449.51	$1,272.71	NA	NA	NA	NA
289	GLDLFLXARS0 - Glendale	SGBHFLXARS0 - Seagrove Beach	$36.41	$32.57	$237.87	$205.68	$4,726.63	$4,006.01	$12,859.07	$10,894.29	$44,973.79	$38,041.95
290	GLDLFLXARS0 - Glendale	SNRSFLXARS0 - Santa Rosa Beach	$36.41	$32.57	$237.87	$205.68	$4,726.63	$4,006.01	$12,859.07	$10,894.29	$44,973.79	$38,041.95
291	GLDLFLXARS0 - Glendale	VLPRFLXADS0 - Valparaiso	$36.41	$32.57	$237.87	$205.68	$4,726.63	$4,006.01	$12,859.07	$10,894.29	$44,973.79	$38,041.95
292	GLGCFLXADS0 - Golden Gate	MOISFLXADS0 - Marco Island	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
293	GLGCFLXADS0 - Golden Gate	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
294	GLGCFLXADS0 - Golden Gate	NPLSFLXCDS0 - Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
295	GLGCFLXADS0 - Golden Gate	NPLSFLXCDS0 - Naples Moorings	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
296	GLGCFLXADS0 - Golden Gate	NPLSFLXCDS0 - Naples Southeast	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
297	GLRDFLXADS0 - Goldenrod	KSSMFLXBDS1 - Reedy Creek	$38.72	$34.67	$289.02	$252.01	$5,192.73	$4,426.63	$14,098.26	$12,012.36	$48,900.23	$41,581.98
298	GLRDFLXADS0 - Goldenrod	LKBRFLXADS1 - Lake Brantley	$32.51	$29.32	$151.82	$133.94	$2,318.20	$1,997.25	$6,270.17	$5,398.73	$21,412.15	$18,389.62
299	GLRDFLXADS0 - Goldenrod	MNTIFLXADS0 - Montverde	$46.93	$41.84	$470.14	$410.37	$8,330.83	$7,107.71	NA	NA	NA	NA
300	GLRDFLXADS0 - Goldenrod	MTLDFLXADS1 - Maitland	$32.51	$29.32	$151.82	$133.94	$2,318.20	$1,997.25	$6,270.17	$5,398.73	$21,412.15	$18,389.62

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
301	GLRDFLXADS0 - Goldenrod	NSN - Celebration*	$24.46	$21.75	$256.99	$223.46	$4,779.11	$4,065.71	$12,984.66	$11,041.30	NA	NA
302	GLRDFLXADS0 - Goldenrod	NSN - East Orange*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
303	GLRDFLXADS0 - Goldenrod	NSN - Geneva*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
304	GLRDFLXADS0 - Goldenrod	NSN - Lake Buena Vista*	$23.69	$21.11	$240.08	$209.36	$4,305.72	$3,670.88	$11,689.58	$9,961.12	$40,539.32	$34,475.77
305	GLRDFLXADS0 - Goldenrod	NSN - Orlando*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
306	GLRDFLXADS0 - Goldenrod	NSN - Oviedo*	$18.08	$16.27	$116.31	$102.49	$1,806.98	$1,554.92	$4,889.54	$4,204.95	$16,727.53	$14,349.73
307	GLRDFLXADS0 - Goldenrod	NSN - Sanford*	$20.41	$18.38	$167.72	$149.04	$2,280.40	$1,981.65	NA	NA	NA	NA
308	GLRDFLXADS0 - Goldenrod	WNDRFLXARS0 - Windermere	$35.54	$31.85	$218.69	$189.69	$4,189.80	$3,558.26	$11,390.42	$9,669.34	$39,721.96	$33,661.49
309	GLRDFLXADS0 - Goldenrod	WNGRFLXADS0 - Winter Garden	$35.24	$31.60	$212.15	$184.24	$4,006.79	$3,405.62	$10,889.74	$9,251.75	$37,931.56	$32,168.15
310	GLRDFLXADS0 - Goldenrod	WNPKFLXADS1 - Winter Park	$28.86	$26.11	$71.20	$63.04	$1,027.33	$888.72	$2,774.60	$2,398.69	$9,416.99	$8,119.61
311	GNVLFLXARS0 - Greenville	LEE FLXARS0 - Lee	$53.65	$47.74	$353.10	$305.43	$6,986.24	$5,922.52	NA	NA	NA	NA
312	GNVLFLXARS0 - Greenville	MDSNFLXADS0 - Madison	$50.15	$44.60	$296.89	$254.89	$6,378.62	$5,383.85	$17,378.51	$14,663.79	NA	NA
313	GNVLFLXARS0 - Greenville	MNTIFLXADS0 - Monticello	$50.15	$44.60	$296.89	$254.89	$6,378.62	$5,383.85	$17,378.51	$14,663.79	NA	NA
314	GNVLFLXARS0 - Greenville	TLHSFLXADS0 - Calhoun	$50.15	$44.60	$296.89	$254.89	$6,378.62	$5,383.85	$17,378.51	$14,663.79	NA	NA
315	GNWDFLXARS0 - Greenwood	MALNFLXARS0 - Malone	$35.66	$32.29	$63.97	$57.01	$824.80	$719.80	$2,220.51	$1,936.56	NA	NA
316	GNWDFLXARS0 - Greenwood	MRNNFLXADS0 - Marianna	$35.66	$32.29	$63.97	$57.01	$824.80	$719.80	$2,220.51	$1,936.56	NA	NA
317	GNWDFLXARS0 - Greenwood	NSN - Graceville*	$21.38	$19.34	$89.11	$79.81	$1,045.65	$919.93	$2,806.73	$2,467.75	NA	NA
318	GNWDFLXARS0 - Greenwood	SNDSFLXARS0 - Sneads	$39.95	$36.09	$132.91	$118.17	$1,788.69	$1,555.61	$4,821.54	$4,190.48	NA	NA
319	GVLDFLXARS0 - Groveland	BSHNFLXADS0 - Bushnell	$36.16	$32.20	$232.39	$197.44	$5,539.17	$4,651.84	$15,117.94	$12,693.83	$53,556.27	$44,935.36
320	GVLDFLXARS0 - Groveland	HOWYFLXARS0 - Howey-in-the-Hills	$39.09	$34.81	$297.24	$255.18	$6,388.38	$5,391.99	NA	NA	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
321	GVLDFLXARS0 - Groveland	LDLKFLXARS0 - Lady Lake	$46.95	$41.53	$470.70	$403.48	$10,278.01	$8,668.03	$28,010.39	$23,615.96	$98,649.42	$83,076.86
322	GVLDFLXARS0 - Groveland	LSBGFLXADS1 - Leesburg	$36.16	$32.20	$232.39	$197.44	$5,539.17	$4,651.84	$15,117.94	$12,693.83	$53,556.27	$44,935.36
323	GVLDFLXARS0 - Groveland	MTDRFLXARS0 - Mt. Dora	$41.63	$36.92	$353.20	$301.84	$7,954.95	$6,698.60	$21,691.00	$18,260.69	$76,556.41	$64,384.42
324	GVLDFLXARS0 - Groveland	MTVRFLXARS0 - Montverde	$44.36	$39.37	$413.51	$355.80	$8,677.27	$7,332.92	NA	NA	NA	NA
325	GVLDFLXARS0 - Groveland	NSN - Orlando*	$35.25	$30.91	$495.32	$425.84	$10,484.21	$8,855.95	$28,556.55	$24,113.75	$100,350.05	$84,627.86
326	GVLDFLXARS0 - Groveland	TVRSFLXADS0 - Tavares	$41.63	$36.92	$353.20	$301.84	$7,954.95	$6,698.60	$21,691.00	$18,260.69	$76,556.41	$64,384.42
327	GVLDFLXARS0 - Groveland	UMTLFLXARS0 - Umatilla	$44.91	$39.83	$425.71	$365.97	$9,018.89	$7,617.85	$24,565.74	$20,742.90	NA	NA
328	GVLDFLXARS0 - Groveland	WNDRFLXARS0 - Windermere	$48.52	$42.84	$505.39	$432.41	$11,249.19	$9,478.04	$30,667.31	$25,832.00	$108,150.47	$91,001.51
329	GVLDFLXARS0 - Groveland	WNGRFLXADS0 - Winter Garden	$41.84	$37.10	$357.91	$305.76	$8,086.72	$6,808.51	$22,051.49	$18,561.36	$77,845.50	$65,459.63
330	HMSPFLXARS0 - Homosassa Springs	BVHLFLXADS0 - Beverly Hills	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
331	HMSPFLXARS0 - Homosassa Springs	INVRFLXADS0 - Inverness	$29.90	$26.98	$94.13	$82.16	$1,669.09	$1,423.98	$4,530.30	$3,863.06	$15,695.32	$13,356.25
332	HOWYFLXARS0 - Howey-In-The-Hills	LDLKFLXARS0 - Lady Lake	$50.54	$45.15	$303.14	$263.78	$5,588.04	$4,756.34	NA	NA	NA	NA
333	HOWYFLXARS0 - Howey-In-The-Hills	LSBGFLXADS1 - Leesburg	$35.72	$32.34	$64.84	$57.74	$849.20	$740.15	NA	NA	NA	NA
334	HOWYFLXARS0 - Howey-In-The-Hills	MTDRFLXARS0 - Mt. Dora	$43.23	$38.83	$185.65	$162.14	$3,264.98	$2,786.91	NA	NA	NA	NA
335	HOWYFLXARS0 - Howey-In-The-Hills	MTVRFLXARS0 - Montverde	$46.98	$42.18	$245.96	$216.10	$3,987.30	$3,421.23	NA	NA	NA	NA
336	HOWYFLXARS0 - Howey-In-The-Hills	TVRSFLXADS0 - Tavares	$43.23	$38.83	$185.65	$162.14	$3,264.98	$2,786.91	NA	NA	NA	NA
337	HOWYFLXARS0 - Howey-In-The-Hills	UMTLFLXARS0 - Umatilla	$47.74	$42.82	$258.16	$226.28	$4,328.92	$3,706.16	NA	NA	NA	NA
338	HOWYFLXARS0 - Howey-In-The-Hills	WLWDFLXARS0 - Wildwood	$42.73	$38.41	$177.63	$155.45	$3,040.49	$2,599.67	NA	NA	NA	NA
339	IMKLFLXARS0 - Immokalee	LBLLFLXADS0 - LaBelle	$47.91	$42.16	$491.90	$417.48	$11,837.23	$9,936.64	$32,312.02	$27,119.29	$114,536.73	$96,063.09
340	IMKLFLXARS0 - Immokalee	NPLSFLXCDS0 - Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.82	$11,073.56	$46,609.53	$39,141.21

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
341	INVRFLXADS0 - Inverness	NSN - Brooksville*	$24.58	$21.68	$259.63	$221.98	$5,818.59	$4,900.82	NA	NA	NA	NA
342	INVRFLXADS0 - Inverness	NSN - Dunnellon*	$18.30	$16.45	$121.10	$106.49	$1,941.19	$1,666.86	$5,256.71	$4,511.19	$18,040.49	$15,444.84
343	INVRFLXADS0 - Inverness	NSN - Yankeetown*	$18.30	$16.45	$121.10	$106.49	$1,941.19	$1,666.86	$5,256.71	$4,511.19	$18,040.49	$15,444.84
344	KGLKFLXARS0 - Kingsley Lake	LWTYFLXARS0 - Lawtey	$35.76	$32.37	$65.54	$58.32	$868.72	$756.43	NA	NA	NA	NA
345	KGLKFLXARS0 - Kingsley Lake	NSN - Jacksonville*	$21.50	$19.44	$91.03	$81.41	$1,099.33	$964.71	NA	NA	NA	NA
346	KGLKFLXARS0 - Kingsley Lake	NSN - Raiford*	$21.50	$19.44	$91.03	$81.41	$1,099.33	$964.71	NA	NA	NA	NA
347	KGLKFLXARS0 - Kingsley Lake	STRKFLXADS0 - Starke	$35.76	$32.37	$65.54	$58.32	$868.72	$756.43	NA	NA	NA	NA
348	KNVLFLXARS0 - Kenansville	KSSMFLXADS0 - Kissimmee	$36.94	$32.85	$249.66	$211.83	$6,022.32	$5,054.82	$16,439.73	$13,796.28	$58,282.92	$48,877.77
349	KNVLFLXARS0 - Kenansville	KSSMFLXBDS1 - West Kissimmee	$43.32	$38.34	$390.60	$333.02	$9,001.78	$7,571.71	$24,554.87	$20,649.34	$86,797.49	$72,926.31
350	KNVLFLXARS0 - Kenansville	NSN - Orlando*	$32.55	$28.50	$435.71	$372.47	$9,781.42	$8,237.91	$26,669.82	$22,455.59	$94,108.03	$79,156.44
351	KNVLFLXARS0 - Kenansville	STCDFLXARS0 - St. Cloud	$36.94	$32.85	$249.66	$211.83	$6,022.32	$5,054.82	$16,439.73	$13,796.28	$58,282.92	$48,877.77
352	KSSMFLXADS0 - Kissimmee	KSSMFLXBDS1 - Reedy Creek	$35.50	$31.81	$217.82	$188.96	$4,165.40	$3,537.91	$11,323.66	$9,613.66	$39,483.24	$33,462.38
353	KSSMFLXADS0 - Kissimmee	KSSMFLXBDS1 - West Kissimmee	$32.02	$28.74	$140.95	$121.19	$2,979.45	$2,516.90	$8,115.15	$6,853.05	$28,514.57	$24,048.54
354	KSSMFLXADS0 - Kissimmee	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
355	KSSMFLXADS0 - Kissimmee	NSN - Haines City*	$18.65	$16.83	$45.19	$39.52	$782.08	$668.24	$2,121.62	$1,811.82	NA	NA
356	KSSMFLXADS0 - Kissimmee	NSN - Orlando*	$21.24	$18.90	$186.05	$160.64	$3,759.10	$3,183.10	$10,230.09	$8,659.31	$35,825.11	$30,278.66
357	KSSMFLXADS0 - Kissimmee	STCDFLXARS0 - St. Cloud	$36.94	$32.85	$249.66	$211.83	$6,022.32	$5,054.82	$16,439.73	$13,796.28	$58,282.92	$48,877.77
358	KSSMFLXADS0 - Kissimmee	WNPKFLXADS1 - Winter Park	$32.02	$28.74	$140.95	$121.19	$2,979.45	$2,516.90	$8,115.15	$6,853.05	$28,514.57	$24,048.54
359	KSSMFLXBDS1 - Reedy Creek	KSSMFLXBDS1 - West Kissimmee	$29.11	$26.32	$76.87	$67.77	$1,185.94	$1,021.01	$3,208.52	$2,760.61	$10,968.67	$9,413.83
360	KSSMFLXBDS1 - Reedy Creek	NSN - Celebration*	$24.71	$21.96	$262.66	$228.19	$4,937.72	$4,198.00	$13,418.58	$11,403.21	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
361	KSSMFLXBDS1 - Reedy Creek	NSN - East Orange*	$24.72	$21.97	$262.92	$228.41	$4,945.04	$4,204.11	$13,438.61	$11,419.92	$46,793.78	$39,692.50
362	KSSMFLXBDS1 - Reedy Creek	NSN - Haines City*	$18.34	$16.49	$122.06	$107.29	$1,968.03	$1,689.25	$5,330.14	$4,572.43	NA	NA
363	KSSMFLXBDS1 - Reedy Creek	NSN - Lake Buena Vista*	$17.56	$15.83	$104.80	$92.90	$1,484.88	$1,286.27	$4,008.35	$3,469.98	$13,576.43	$11,721.45
364	KSSMFLXBDS1 - Reedy Creek	NSN Orlando*	$24.72	$21.97	$262.92	$228.41	$4,945.04	$4,204.11	$13,438.61	$11,419.92	$46,793.78	$39,692.50
365	KSSMFLXBDS1 - Reedy Creek	WNDRFLXARS0 - Windermere	$35.79	$32.06	$224.36	$194.41	$4,348.41	$3,690.55	$11,824.34	$10,031.26	$41,273.64	$34,955.71
366	KSSMFLXBDS1 - Reedy Creek	WNGRFLXADS0 - Winter Garden	$35.50	$31.81	$217.82	$188.96	$4,165.40	$3,537.91	$11,323.66	$9,613.66	$39,483.24	$33,462.38
367	KSSMFLXBDS1 - Reedy Creek	WNPKFLXADS1 - Winter Park	$35.50	$31.81	$217.82	$188.96	$4,165.40	$3,537.91	$11,323.66	$9,613.66	$39,483.24	$33,462.38
368	KSSMFLXBDS1 - West Kissimmee	KNVLFLXARS0 - Kenansville	$43.32	$38.34	$390.60	$333.02	$9,001.78	$7,571.71	$24,554.87	$20,649.34	$86,797.49	$72,926.31
369	KSSMFLXBDS1 - West Kissimmee	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
370	KSSMFLXBDS1 - West Kissimmee	NSN - Haines City*	$21.25	$18.91	$186.14	$160.71	$3,761.54	$3,185.13	$10,236.77	$8,664.87	NA	NA
371	KSSMFLXBDS1 - West Kissimmee	NSN - Lake Buena Vista*	$14.08	$12.77	$27.93	$25.13	$298.93	$265.26	$799.84	$709.37	$2,607.76	$2,307.62
372	KSSMFLXBDS1 - West Kissimmee	NSN - Orlando*	$21.24	$18.90	$186.05	$160.64	$3,759.10	$3,183.10	$10,230.09	$8,659.31	$35,825.11	$30,278.66
373	KSSMFLXDRS0 - Buenaventura Lakes	KSSMFLXADS0 - Kissimmee	$33.28	$29.88	$168.88	$146.32	$3,278.39	$2,782.16	$8,914.98	$7,562.42	$31,122.33	$26,356.16
374	LDLKFLXARS0 - Lady Lake (753)	LSBGFLXADS1 - Leesburg	$36.43	$32.59	$238.30	$206.04	$4,738.83	$4,016.19	$12,892.45	$10,922.13	$45,093.15	$38,141.50
375	LDLKFLXARS0 - Lady Lake (753)	MTDRFLXARS0 - Mt. Dora	$36.21	$32.41	$233.60	$202.12	$4,607.07	$3,906.28	$12,531.96	$10,621.46	$43,804.07	$37,066.30
376	LDLKFLXARS0 - Lady Lake (753)	MTVRFLXARS0 - Montverde	$38.94	$34.85	$293.90	$256.08	$5,329.38	$4,540.60	NA	NA	NA	NA
377	LDLKFLXARS0 - Lady Lake (753)	OKLWFLXADS0 - Ocklawaha	$40.27	$35.96	$323.28	$280.57	$6,151.71	$5,226.47	$16,721.80	$14,200.56	$58,281.92	$49,407.07
378	LDLKFLXARS0 - Lady Lake (753)	SVSSFLXARS0 - Silver Springs Shores	$40.27	$35.96	$323.28	$280.57	$6,151.71	$5,226.47	$16,721.80	$14,200.56	$58,281.92	$49,407.07
379	LDLKFLXARS0 - Lady Lake (753)	TVRSFLXADS0 - Tavares	$36.21	$32.41	$233.60	$202.12	$4,607.07	$3,906.28	$12,531.96	$10,621.46	$43,804.07	$37,066.30
380	LDLKFLXARS0 - Lady Lake (753)	UMTLFLXARS0 - Umatilla	$39.50	$35.31	$306.11	$266.25	$5,671.00	$4,825.53	$15,406.69	$13,103.68	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
381	LDLKFLXARS0 - Lady Lake (753)	WLWDFLXARS0 - Wildwood	$36.43	$32.59	$238.30	$206.04	$4,738.83	$4,016.19	$12,892.45	$10,922.13	$45,093.15	$38,141.50
382	LDLKFLXARS0 - Lady Lake (821)	LSBGFLXADS1 - Leesburg	$36.43	$32.59	$238.30	$206.04	$4,738.83	$4,016.19	$12,892.45	$10,922.13	$45,093.15	$38,141.50
383	LDLKFLXARS0 - Lady Lake (821)	MTDRFLXARS0 - Mt. Dora	$36.21	$32.41	$233.60	$202.12	$4,607.07	$3,906.28	$12,531.96	$10,621.46	$43,804.07	$37,066.30
384	LDLKFLXARS0 - Lady Lake (821)	MTVRFLXARS0 - Montverde	$38.94	$34.85	$293.90	$256.08	$5,329.38	$4,540.60	NA	NA	NA	NA
385	LDLKFLXARS0 - Lady Lake (821)	OCALFLXADS0 - Ocala	$46.95	$41.53	$470.70	$403.48	$10,278.01	$8,668.03	$28,010.39	$23,615.96	$98,649.42	$83,076.86
386	LDLKFLXARS0 - Lady Lake (821)	OKLWFLXADS0 - Ocklawaha	$40.27	$35.96	$323.28	$280.57	$6,151.71	$5,226.47	$16,721.80	$14,200.56	$58,281.92	$49,407.07
387	LDLKFLXARS0 - Lady Lake (821)	SSPRFLXARS0 - Salt Springs	$51.47	$45.46	$570.41	$490.29	$12,103.27	$10,222.27	$32,967.94	$27,835.37	$115,872.55	$97,707.42
388	LDLKFLXARS0 - Lady Lake (821)	SVSSFLXARS0 - Silver Springs Shores	$40.27	$35.96	$323.28	$280.57	$6,151.71	$5,226.47	$16,721.80	$14,200.56	$58,281.92	$49,407.07
389	LDLKFLXARS0 - Lady Lake (821)	TVRSFLXADS0 - Tavares	$36.21	$32.41	$233.60	$202.12	$4,607.07	$3,906.28	$12,531.96	$10,621.46	$43,804.07	$37,066.30
390	LDLKFLXARS0 - Lady Lake (821)	UMTLFLXARS0 - Umatilla	$39.50	$35.31	$306.11	$266.25	$5,671.00	$4,825.53	$15,406.69	$13,103.68	NA	NA
391	LEE FLXARS0 - Lee	MDSNFLXADS0 - Madison	$35.18	$31.89	$56.21	$50.54	$607.63	$538.66	NA	NA	NA	NA
392	LHACFLXADS0 - Lehigh Acres	CPCRFLXADS0 - Cape Coral	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
393	LHACFLXADS0 - Lehigh Acres	CPCRFLXBDS1 - North Cape Coral	$38.44	$34.26	$282.76	$243.11	$5,983.31	$5,054.15	$16,297.05	$13,761.78	$57,267.86	$48,296.20
394	LHACFLXADS0 - Lehigh Acres	NFMYFLXADS0 - North Fort Myers	$40.35	$35.85	$324.87	$278.22	$7,161.90	$6,037.16	$19,521.41	$16,451.10	$68,798.02	$57,913.29
395	LKBRFLXADS1 - Lake Brantley	KSSMFLXBDS1 - Reedy Creek	$39.15	$35.02	$298.44	$259.86	$5,456.27	$4,646.43	$14,819.23	$12,613.70	$51,478.40	$43,732.39
396	LKBRFLXADS1 - Lake Brantley	MNTIFLXADS0 - Montverde	$47.35	$42.20	$479.55	$418.22	$8,594.36	$7,327.52	NA	NA	NA	NA
397	LKBRFLXADS1 - Lake Brantley	MTLDFLXADS1 - Maitland	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
398	LKBRFLXADS1 - Lake Brantley	NSN - Celebration*	$24.88	$22.10	$266.41	$231.31	$5,042.65	$4,285.52	$13,705.64	$11,642.64	NA	NA
399	LKBRFLXADS1 - Lake Brantley	NSN - East Orange*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
400	LKBRFLXADS1 - Lake Brantley	NSN - Geneva*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION

	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
401	LKBRFLXADS1 - Lake Brantley	NSN - Lake Buena Vista*	$24.12	$21.46	$249.50	$217.21	$4,569.26	$3,890.69	$12,410.55	$10,562.45	$43,117.50	$36,626.18
402	LKBRFLXADS1 - Lake Brantley	NSN - Orlando*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
403	LKBRFLXADS1 - Lake Brantley	NSN - Oviedo*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
404	LKBRFLXADS1 - Lake Brantley	NSN - Sanford*	$20.84	$18.73	$177.14	$156.88	$2,543.93	$2,201.45	NA	NA	NA	NA
405	LKBRFLXADS1 - Lake Brantley	WNDRFLXARS0 - Windermere	$35.96	$32.20	$228.10	$197.54	$4,453.34	$3,778.06	$12,111.39	$10,270.68	$42,300.13	$35,811.89
406	LKBRFLXADS1 - Lake Brantley	WNGRFLXADS0 - Winter Garden	$35.67	$31.95	$221.57	$192.09	$4,270.33	$3,625.42	$11,610.72	$9,853.09	$40,509.73	$34,318.56
407	LKBRFLXADS1 - Lake Brantley	WNPKFLXADS1 - Winter Park	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
408	LKHLFLXARS0 - Lake Helen	NSN - Deltona Lakes*	$35.12	$31.84	$55.25	$49.74	$580.79	$516.28	NA	NA	NA	NA
409	LKHLFLXARS0 - Lake Helen	ORCYFLXADS0 - Orange City	$35.12	$31.84	$55.25	$49.74	$580.79	$516.28	NA	NA	NA	NA
410	LKPCFLXARS0 - Lake Placid	SBNGFLXADS1 - Sebring	$35.52	$32.17	$61.61	$55.05	$758.92	$664.85	$2,040.27	$1,786.22	NA	NA
411	LKPCFLXARS0 - Lake Placid	SLHLFLXARS0 - Spring Lake	$53.23	$47.17	$346.49	$296.24	$7,767.06	$6,541.89	$21,176.98	$17,831.95	NA	NA
412	LSBGFLXADS1 - Leesburg	MTDRFLXARS0 - Mt. Dora	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
413	LSBGFLXADS1 - Leesburg	MTVRFLXARS0 - Montverde	$33.84	$30.43	$181.12	$158.36	$3,138.10	$2,681.08	NA	NA	NA	NA
414	LSBGFLXADS1 - Leesburg	TVRSFLXADS0 - Tavares	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
415	LSBGFLXADS1 - Leesburg	UMTLFLXARS0 - Umatilla	$34.39	$30.89	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
416	LSBGFLXADS1 - Leesburg	WLWDFLXARS0 - Wildwood	$30.74	$27.68	$112.79	$97.72	$2,191.29	$1,859.52	$5,958.90	$5,054.61	$20,803.92	$17,617.24
417	LWTYFLXARS0 - Lawtey	NSN - Raiford*	$21.50	$19.44	$91.03	$81.41	$1,099.33	$964.71	NA	NA	NA	NA
418	LWTYFLXARS0 - Lawtey	STRKFLXADS0 - Starke	$35.76	$32.37	$65.54	$58.32	$868.72	$756.43	NA	NA	NA	NA
419	MALNFLXARS0 - Malone	MRNNFLXADS0 - Marianna	$35.66	$32.29	$63.97	$57.01	$824.80	$719.80	$2,220.51	$1,936.56	NA	NA
420	MALNFLXARS0 - Malone	NSN - Graceville*	$21.38	$19.34	$89.11	$79.81	$1,045.65	$919.93	$2,806.73	$2,467.75	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
421	MALNFLXARS0 - Malone	SNDSFLXARS0 - Sneads	$39.95	$36.09	$132.91	$118.17	$1,788.69	$1,555.61	$4,821.54	$4,190.48	NA	NA
422	MDSNFLXADS0 - Madison	MNTIFLXADS0 - Monticello	$35.68	$31.80	$221.85	$188.64	$5,243.91	$4,405.58	$14,310.18	$12,020.11	$50,667.76	$42,526.11
423	MDSNFLXADS0 - Madison	TLHSFLXADS0 - Calhoun	$35.68	$31.80	$221.85	$188.64	$5,243.91	$4,405.58	$14,310.18	$12,020.11	$50,667.76	$42,526.11
424	MNTIFLXADS0 - Monticello	TLHSFLXADS0 - Calhoun	$35.68	$31.80	$221.85	$188.64	$5,243.91	$4,405.58	$14,310.18	$12,020.11	$50,667.76	$42,526.11
425	MOISFLXADS0 - Marco Island	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
426	MOISFLXADS0 - Marco Island	NPLSFLXCDS0 - Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
427	MOISFLXADS0 - Marco Island	NPLSFLXCDS0 - Naples Moorings	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
428	MOISFLXADS0 - Marco Island	NPLSFLXCDS0 - Naples Southeast	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
429	MRNNFLXADS0 - Marianna	NSN - Altha *	$17.99	$16.28	$34.56	$30.65	$484.39	$419.94	NA	NA	NA	NA
430	MRNNFLXADS0 - Marianna	NSN - Graceville*	$17.41	$15.79	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	NA	NA
431	MRNNFLXADS0 - Marianna	SNDSFLXARS0 - Sneads	$35.97	$32.55	$68.94	$61.15	$963.89	$835.81	$2,601.03	$2,253.93	NA	NA
432	MTDRFLXARS0 - Mt. Dora	MTVRFLXARS0 - Montverde	$33.84	$30.43	$181.12	$158.36	$3,138.10	$2,681.08	NA	NA	NA	NA
433	MTDRFLXARS0 - Mt. Dora	TVRSFLXADS0 - Tavares	$31.10	$27.98	$120.81	$104.40	$2,415.78	$2,046.76	$6,573.06	$5,566.86	$23,000.14	$19,449.06
434	MTDRFLXARS0 - Mt. Dora	UMTLFLXARS0 - Umatilla	$34.39	$30.89	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
435	MTDRFLXARS0 - Mt. Dora	WNPKFLXADS1 - Winter Park	$37.49	$33.47	$261.75	$225.59	$5,395.23	$4,563.66	$14,688.21	$12,419.91	$51,514.71	$43,497.61
436	MTLDFLXADS1 - Maitland	KSSMFLXBDS1 - Reedy Creek	$39.15	$35.02	$298.44	$259.86	$5,456.27	$4,646.43	$14,819.23	$12,613.70	$51,478.40	$43,732.39
437	MTLDFLXADS1 - Maitland	MNTIFLXADS0 - Montverde	$47.35	$42.20	$479.55	$418.22	$8,594.36	$7,327.52	NA	NA	NA	NA
438	MTLDFLXADS1 - Maitland	NSN - Celebration*	$24.88	$22.10	$266.41	$231.31	$5,042.65	$4,285.52	$13,705.64	$11,642.64	NA	NA
439	MTLDFLXADS1 - Maitland	NSN - East Orange*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
440	MTLDFLXADS1 - Maitland	NSN - Geneva*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
441	MTLDFLXADS1 - Maitland	NSN - Lake Buena Vista*	$24.12	$21.46	$249.50	$217.21	$4,569.26	$3,890.69	$12,410.55	$10,562.45	$43,117.50	$36,626.18
442	MTLDFLXADS1 - Maitland	NSN - Orlando*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
443	MTLDFLXADS1 - Maitland	NSN - Oviedo*	$18.51	$16.62	$125.72	$110.34	$2,070.51	$1,774.73	$5,610.52	$4,806.29	$19,305.70	$16,500.14
444	MTLDFLXADS1 - Maitland	NSN - Sanford*	$20.84	$18.73	$177.14	$156.88	$2,543.93	$2,201.45	NA	NA	NA	NA
445	MTLDFLXADS1 - Maitland	WNDRFLXARS0 - Windermere	$35.96	$32.20	$228.10	$197.54	$4,453.34	$3,778.06	$12,111.39	$10,270.68	$42,300.13	$35,811.89
446	MTLDFLXADS1 - Maitland	WNGRFLXADS0 - Winter Garden	$35.67	$31.95	$221.57	$192.09	$4,270.33	$3,625.42	$11,610.72	$9,853.09	$40,509.73	$34,318.56
447	MTLDFLXADS1 - Maitland	WNPKFLXADS1 - Winter Park	$29.28	$26.46	$80.62	$70.89	$1,290.87	$1,108.53	$3,495.57	$3,000.03	$11,995.16	$10,270.01
448	MTVRFLXARS0 - Montverde	KSSMFLXBDS1 - Reedy Creek	$48.02	$43.05	$262.69	$230.06	$4,455.81	$3,811.99	NA	NA	NA	NA
449	MTVRFLXARS0 - Montverde	NSN - Celebration*	$21.98	$19.83	$98.61	$87.73	$1,311.63	$1,141.77	NA	NA	NA	NA
450	MTVRFLXARS0 - Montverde	NSN - East Orange*	$31.16	$27.72	$246.36	$214.60	$4,481.41	$3,817.42	NA	NA	NA	NA
451	MTVRFLXARS0 - Montverde	NSN - Lake Buena Vista*	$30.10	$26.83	$229.18	$200.28	$4,000.70	$3,416.48	NA	NA	NA	NA
452	MTVRFLXARS0 - Montverde	NSN - Orlando*	$31.16	$27.72	$246.36	$214.60	$4,481.41	$3,817.42	NA	NA	NA	NA
453	MTVRFLXARS0 - Montverde	TVRSFLXADS0 - Tavares	$42.95	$38.59	$181.12	$158.36	$3,138.10	$2,681.08	NA	NA	NA	NA
454	MTVRFLXARS0 - Montverde	UMTLFLXARS0 - Umatilla	$47.46	$42.58	$253.63	$222.50	$4,202.03	$3,600.33	NA	NA	NA	NA
455	MTVRFLXARS0 - Montverde	WNDRFLXARS0 - Windermere	$44.61	$39.98	$207.79	$180.60	$3,884.78	$3,303.86	NA	NA	NA	NA
456	MTVRFLXARS0 - Montverde	WNGRFLXADS0 - Winter Garden	$35.44	$32.10	$60.31	$53.96	$722.32	$634.32	NA	NA	NA	NA
457	MTVRFLXARS0 - Montverde	WNPKFLXADS1 - Winter Park	$44.20	$39.64	$201.25	$175.15	$3,701.77	$3,151.22	NA	NA	NA	NA
458	NFMYFLXADS0 - North Fort Myers	CPCRFLXBDS1 - North Cape Coral	$29.06	$26.28	$75.74	$66.82	$1,154.22	$994.55	$3,121.73	$2,688.23	$10,658.33	$9,154.99
459	NFMYFLXADS0 - North Fort Myers	PNGRFLXADS1 - Punta Gorda	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
460	NFMYFLXADS0 - North Fort Myers	PNISFLXADS0 - Pine Island	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
461	NFMYFLXADS0 - North Fort Myers	SNISFLXADS0 - Sanibel-Captiva Isl.	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08
462	NNPLFLXADS1 - North Naples	MOISFLXADS0 - Marco Island	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
463	NPLSFLXCDS0 - Naples	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
464	NPLSFLXCDS0 - Naples	NPLSFLXCDS0 - Naples Southeast	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
465	NPLSFLXCDS0 - Naples Moorings	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
466	NPLSFLXCDS0 - Naples Moorings	NPLSFLXCDS0 - Naples Southeast	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
467	NPLSFLXCDS0 - Naples Southeast	NNPLFLXADS1 - North Naples	$35.01	$31.24	$207.03	$176.29	$4,829.09	$4,059.59	$13,175.32	$11,073.56	$46,609.53	$39,141.21
468	NPLSFLXCDS0 - Niceville	SHLMFLXADS0 - Shalimar	$35.20	$31.48	$211.16	$181.57	$4,461.86	$3,769.24	$12,152.69	$10,262.88	$42,700.24	$36,013.08
469	OCALFLXADS0 - Ocala	NSN - Citra*	$24.97	$22.01	$268.26	$229.18	$6,060.16	$5,102.31	NA	NA	NA	NA
470	OCALFLXADS0 - Ocala	NSN - Dunnellon*	$24.56	$21.67	$259.37	$221.76	$5,811.26	$4,894.72	$15,844.35	$13,341.95	$55,901.44	$47,023.96
471	OCALFLXADS0 - Ocala	NSN - McIntosh*	$18.07	$16.35	$35.86	$31.74	$520.99	$450.47	NA	NA	NA	NA
472	OCALFLXADS0 - Ocala	NSN - Orange Springs*	$18.07	$16.35	$35.86	$31.74	$520.99	$450.47	NA	NA	NA	NA
473	OCALFLXADS0 - Ocala	OCALFLXBDS0 - Shady Road	$36.16	$32.20	$232.39	$197.44	$5,539.17	$4,651.84	$15,117.94	$12,693.83	$53,556.27	$44,935.36
474	OCALFLXADS0 - Ocala	OKLWFLXADS0 - Ocklawaha	$29.48	$26.63	$84.98	$74.53	$1,412.88	$1,210.29	$3,829.35	$3,278.43	$13,188.76	$11,265.57
475	OCALFLXADS0 - Ocala	SSPRFLXARS0 - Salt Springs	$30.15	$27.19	$99.71	$86.81	$1,825.26	$1,554.24	$4,957.55	$4,219.41	$17,223.13	$14,630.56
476	OCALFLXADS0 - Ocala	SVSPFLXARS0 - Silver Springs	$30.15	$27.19	$99.71	$86.81	$1,825.26	$1,554.24	$4,957.55	$4,219.41	$17,223.13	$14,630.56
477	OCALFLXADS0 - Ocala	SVSSFLXARS0 - Silver Springs Shores	$29.48	$26.63	$84.98	$74.53	$1,412.88	$1,210.29	$3,829.35	$3,278.43	$13,188.76	$11,265.57
478	OCALFLXADS0 - Ocala	WLSTFLXARS0 - Williston	$39.30	$34.98	$301.68	$258.88	$6,512.82	$5,495.79	$17,745.67	$14,970.03	NA	NA
479	OCALFLXADS0 - Ocala	WLWDFLXARS0 - Wildwood	$41.27	$36.62	$345.18	$295.15	$7,730.46	$6,511.36	$21,076.84	$17,748.44	$74,360.19	$62,552.60
480	OCALFLXCRS0 - Highlands	LDLKFLXARS0 - Lady Lake (821)	$51.47	$45.46	$570.41	$490.29	$12,103.27	$10,222.27	$32,967.94	$27,835.37	$115,872.55	$97,707.42

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
481	OCALFLXCRS0 - Highlands	NSN - Citra*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
482	OCALFLXCRS0 - Highlands	NSN - Dunnellon*	$29.08	$25.60	$359.08	$308.58	$7,636.53	$6,448.96	$20,801.89	$17,561.36	$73,124.57	$61,654.52
483	OCALFLXCRS0 - Highlands	NSN - McIntosh*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
484	OCALFLXCRS0 - Highlands	NSN - Orange Springs*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
485	OCALFLXCRS0 - Highlands	OCALFLXADS0 - Ocala	$30.15	$27.19	$99.71	$86.81	$1,825.26	$1,554.24	$4,957.55	$4,219.41	$17,223.13	$14,630.56
486	OCALFLXCRS0 - Highlands	OCALFLXBDS0 - Shady Road	$40.67	$36.13	$332.11	$284.25	$7,364.44	$6,206.08	$20,075.49	$16,913.24	$70,779.40	$59,565.92
487	OCALFLXCRS0 - Highlands	OKLWFLXADS0 - Ocklawaha	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
488	OCALFLXCRS0 - Highlands	SSPRFLXARS0 - Salt Springs	$30.15	$27.19	$99.71	$86.81	$1,825.26	$1,554.24	$4,957.55	$4,219.41	$17,223.13	$14,630.56
489	OCALFLXCRS0 - Highlands	SVSSFLXARS0 - Silver Springs Shores	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
490	OCNFFLXARS0 - Forest	LDLKFLXARS0 - Lady Lake (821)	$55.10	$48.66	$650.68	$560.90	$13,384.38	$11,322.65	$36,436.80	$30,813.14	$127,772.23	$107,897.79
491	OCNFFLXARS0 - Forest	NSN - Citra*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
492	OCNFFLXARS0 - Forest	NSN - Dunnellon*	$29.08	$25.60	$359.08	$308.58	$7,636.53	$6,448.96	$20,801.89	$17,561.36	$73,124.57	$61,654.52
493	OCNFFLXARS0 - Forest	NSN - McIntosh*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
494	OCNFFLXARS0 - Forest	NSN - Orange Springs*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
495	OCNFFLXARS0 - Forest	OCALFLXADS0 - Ocala	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
496	OCNFFLXARS0 - Forest	OCALFLXCRS0 - Highlands	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
497	OCNFFLXARS0 - Forest	OKLWFLXADS0 - Ocklawaha	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
498	OCNFFLXARS0 - Forest	SSPRFLXARS0 - Salt Springs	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
499	OCNFFLXARS0 - Forest	SVSSFLXARS0 - Silver Springs Shores	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
500	OKCBFLXADS1 - Okeechobee	SBNGFLXADS1 - Sebring	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
501	OKLWFLXADS0 - Ocklawaha	ESTSFLXARS0 - Eustis	$45.69	$40.48	$442.89	$380.29	$9,499.60	$8,018.79	$25,880.85	$21,839.79	$91,034.26	$76,725.20
502	OKLWFLXADS0 - Ocklawaha	LSBGFLXADS1 - Leesburg	$34.59	$31.06	$197.77	$172.24	$3,604.16	$3,069.81	$9,788.25	$8,333.04	$33,992.68	$28,882.81
503	OKLWFLXADS0 - Ocklawaha	NSN - Citra*	$18.29	$16.44	$120.84	$106.27	$1,933.87	$1,660.75	NA	NA	NA	NA
504	OKLWFLXADS0 - Ocklawaha	NSN - Dunnellon*	$28.41	$25.05	$344.34	$296.29	$7,224.14	$6,105.00	$19,673.70	$16,620.38	$69,090.20	$58,289.53
505	OKLWFLXADS0 - Ocklawaha	NSN - McIntosh*	$18.29	$16.44	$120.84	$106.27	$1,933.87	$1,660.75	NA	NA	NA	NA
506	OKLWFLXADS0 - Ocklawaha	NSN - Orange Springs*	$18.29	$16.44	$120.84	$106.27	$1,933.87	$1,660.75	NA	NA	NA	NA
507	OKLWFLXADS0 - Ocklawaha	SSPRFLXARS0 - Salt Springs	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
508	OKLWFLXADS0 - Ocklawaha	SVSSFLXARS0 - Silver Springs Shores	$29.48	$26.63	$84.98	$74.53	$1,412.88	$1,210.29	$3,829.35	$3,278.43	$13,188.76	$11,265.57
509	OKLWFLXADS0 - Ocklawaha	UMTLFLXARS0 - Umatilla	$48.76	$43.20	$510.69	$440.50	$10,431.7 7	$8,828.14	$28,395.09	$24,021.33	NA	NA
510	ORCYFLXADS0 - Orange City	NSN - DeBary*	$17.70	$16.04	$29.94	$26.80	$355.06	$312.07	$953.38	$837.43	NA	NA
511	ORCYFLXADS0 - Orange City	NSN - Deland*	$17.50	$15.87	$26.71	$24.11	$264.77	$236.77	NA	NA	NA	NA
512	ORCYFLXADS0 - Orange City	NSN - DeLeon Springs*	$17.50	$15.87	$26.71	$24.11	$264.77	$236.77	NA	NA	NA	NA
513	ORCYFLXADS0 - Orange City	NSN - Deltona Lakes*	$35.12	$31.84	$55.25	$49.74	$580.79	$516.28	NA	NA	NA	NA
514	ORCYFLXADS0 - Orange City	NSN - Sanford*	$17.70	$16.04	$29.94	$26.80	$355.06	$312.07	$953.38	$837.43	NA	NA
515	ORCYFLXADS0 - Orange City	WNPKFLXADS1 - Winter Park	$40.84	$36.84	$147.20	$130.09	$2,188.88	$1,889.38	NA	NA	NA	NA
516	PANCFLXARS0 - Panacea	NSN - Alligator Point*	$21.34	$19.15	$188.21	$166.12	$2,853.83	$2,459.93	$7,717.55	$6,648.19	NA	NA
517	PANCFLXARS0 - Panacea	SPCPFLXADS0 - Sopchoppy	$33.02	$29.74	$163.07	$143.32	$2,632.98	$2,259.79	$7,131.33	$6,116.99	$24,491.64	$20,958.16
518	PANCFLXARS0 - Panacea	STMKFLXARS0 - St. Marks	$31.22	$28.25	$123.40	$110.24	$1,522.72	$1,333.77	$4,093.89	$3,583.58	$13,629.89	$11,898.58
519	PANCFLXARS0 - Panacea	TLHSFLXADS0 - Calhoun	$33.02	$29.74	$163.07	$143.32	$2,632.98	$2,259.79	$7,131.33	$6,116.99	$24,491.64	$20,958.16
520	PNISFLXADS0 - Pine Island	SNISFLXADS0 - Sanibel-Captiva Isl.	$30.97	$27.87	$117.84	$101.93	$2,332.81	$1,977.56	$6,346.09	$5,377.55	$22,188.50	$18,772.08

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
521	PNISFLXADS0 - Ponce de Leon	RYHLFLXARS0 - Reynolds Hill	$50.92	$45.70	$309.31	$272.60	$4,795.02	$4,126.79	NA	NA	NA	NA
522	PNISFLXADS0 - Ponce de Leon	SGBHFLXARS0 - Seagrove Beach	$46.47	$41.53	$237.69	$205.53	$4,721.75	$4,001.94	NA	NA	NA	NA
523	PNISFLXADS0 - Ponce de Leon	SNRSFLXARS0 - Santa Rosa Beach	$46.47	$41.53	$237.69	$205.53	$4,721.75	$4,001.94	NA	NA	NA	NA
524	PNISFLXADS0 - Ponce de Leon	VLPRFLXADS0 - Valparaiso	$46.47	$41.53	$237.69	$205.53	$4,721.75	$4,001.94	NA	NA	NA	NA
525	PNISFLXADS0 - Ponce de Leon	WSTVFLXARS0 - Westville	$47.40	$42.54	$252.76	$221.77	$4,177.63	$3,579.98	NA	NA	NA	NA
526	PTCTFLXADS0 - Port Charlotte	NSN - North Port*	$17.87	$16.17	$32.55	$28.98	$428.26	$373.13	$1,153.65	$1,004.47	NA	NA
527	PTCTFLXADS0 - Port Charlotte	PNGRFLXADS1 - Punta Gorda	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
528	RYHLFLXARS0 - Reynolds Hill	NSN - Graceville*	$26.41	$23.76	$169.99	$150.92	$2,343.84	$2,034.57	NA	NA	NA	NA
529	RYHLFLXARS0 - Reynolds Hill	WSTVFLXARS0 - Westville	$40.69	$36.71	$144.85	$128.12	$2,122.99	$1,834.43	NA	NA	NA	NA
530	SBNGFLXADS1 - Sebring	SLHLFLXARS0 - Spring Lake	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
531	SBNGFLXADS1 - Sebring	WCHLFLXADS0 - Wauchula	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
532	SHLMFLXADS0 - Shalimar	VLPRFLXADS0 - Valparaiso	$36.44	$32.60	$238.56	$206.26	$4,746.15	$4,022.29	$12,912.48	$10,938.84	$45,164.77	$38,201.24
533	SNANFLXARS0 - San Antonio	NSN - Brooksville*	$17.29	$15.61	$98.79	$87.88	$1,316.51	$1,145.84	NA	NA	NA	NA
534	SNANFLXARS0 - San Antonio	NSN - Tampa Central*	$17.29	$15.61	$98.79	$87.88	$1,316.51	$1,145.84	NA	NA	NA	NA
535	SNANFLXARS0 - San Antonio	NSN - Tampa North*	$17.29	$15.61	$98.79	$87.88	$1,316.51	$1,145.84	NA	NA	NA	NA
536	SNANFLXARS0 - San Antonio	NSN - Zephyrhills*	$17.29	$15.61	$98.79	$87.88	$1,316.51	$1,145.84	NA	NA	NA	NA
537	SNANFLXARS0 - San Antonio	TLCHFLXARS0 - Trilacoochee	$28.87	$26.12	$71.55	$63.34	$1,037.09	$896.86	$2,801.30	$2,420.97	$9,512.48	$8,199.25
538	SNDSFLXARS0 - Sneads	NSN - Chattahoochee*	$21.69	$19.59	$94.08	$83.96	$1,184.74	$1,035.94	$3,187.24	$2,785.12	NA	NA
539	SNDSFLXARS0 - Sneads	NSN - Graceville*	$21.69	$19.59	$94.08	$83.96	$1,184.74	$1,035.94	$3,187.24	$2,785.12	NA	NA
540	SNRSFLXARS0 - Santa Rosa Beach	SGBHFLXARS0 - Seagrove Beach	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
541	SNRSFLXARS0 - Santa Rosa Beach	VLPRFLXADS0 - Valparaiso	$33.67	$30.12	$177.39	$151.57	$3,999.44	$3,367.62	$10,905.58	$9,180.45	$38,493.06	$32,371.41
542	SPCPFLXADS0 - Sopchoppy	NSN - Alligator Point*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
543	SPCPFLXADS0 - Sopchoppy	NSN - Carrabelle*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
544	SPCPFLXADS0 - Sopchoppy	STMKFLXARS0 - St. Marks	$32.88	$29.63	$160.11	$140.84	$2,550.02	$2,190.59	$6,904.36	$5,927.68	$23,679.99	$20,281.18
545	SPCPFLXADS0 - Sopchoppy	TLHSFLXADS0 - Calhoun	$30.16	$27.19	$99.89	$86.96	$1,830.14	$1,558.31	$4,970.90	$4,230.55	$17,270.87	$14,670.38
546	SSPRFLXARS0 - Salt Springs	NSN - Citra*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
547	SSPRFLXARS0 - Salt Springs	NSN - Dunnellon*	$29.08	$25.60	$359.08	$308.58	$7,636.53	$6,448.96	$20,801.89	$17,561.36	$73,124.57	$61,654.52
548	SSPRFLXARS0 - Salt Springs	NSN - McIntosh*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
549	SSPRFLXARS0 - Salt Springs	NSN - Orange Springs*	$18.96	$17.00	$135.57	$118.55	$2,346.25	$2,004.71	NA	NA	NA	NA
550	SSPRFLXARS0 - Salt Springs	SVSSFLXARS0 - Silver Springs Shores	$34.00	$30.56	$184.69	$161.34	$3,238.14	$2,764.53	$8,786.90	$7,497.84	$30,411.89	$25,896.13
551	STCDFLXARS0 - St. Cloud	KSSMFLXBDS1 - West Kissimmee	$32.02	$28.74	$140.95	$121.19	$2,979.45	$2,516.90	$8,115.15	$6,853.05	$28,514.57	$24,048.54
552	STCDFLXARS0 - St. Cloud	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
553	STCDFLXARS0 - St. Cloud	NSN - Orlando*	$21.24	$18.90	$186.05	$160.64	$3,759.10	$3,183.10	$10,230.09	$8,659.31	$35,825.11	$30,278.66
554	STCDFLXARS0 - St. Cloud	WNPKFLXADS1 - Winter Park	$32.02	$28.74	$140.95	$121.19	$2,979.45	$2,516.90	$8,115.15	$6,853.05	$28,514.57	$24,048.54
555	STMKFLXARS0 - St. Marks	NSN - Alligator Point*	$21.21	$19.04	$185.25	$163.64	$2,770.87	$2,390.73	$7,490.57	$6,458.88	NA	NA
556	STMKFLXARS0 - St. Marks	TLHSFLXDDS0 - Blairstone	$32.88	$29.63	$160.11	$140.84	$2,550.02	$2,190.59	$6,904.36	$5,927.68	$23,679.99	$20,281.18
557	STRKFLXADS0 - Starke	LWTYFLXARS0 - Lawtey	$35.76	$32.37	$65.54	$58.32	$868.72	$756.43	NA	NA	NA	NA
558	STRKFLXADS0 - Starke	NSN - Brooker*	$17.43	$15.81	$25.49	$23.09	$230.61	$208.28	NA	NA	NA	NA
559	STRKFLXADS0 - Starke	NSN - Keystone Heights*	$17.43	$15.81	$25.49	$23.09	$230.61	$208.28	$612.92	$553.47	NA	NA
560	STRKFLXADS0 - Starke	NSN - Lake Butler*	$17.43	$15.81	$25.49	$23.09	$230.61	$208.28	NA	NA	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
561	STRKFLXADS0 - Starke	NSN - Raiford*	$17.43	$15.81	$25.49	$23.09	$230.61	$208.28	NA	NA	NA	NA
562	STRKFLXADS0 - Starke	NSN - Waldo*	$17.43	$15.81	$25.49	$23.09	$230.61	$208.28	NA	NA	NA	NA
563	SVSSFLXARS0 - Silver Springs Shores	NSN - Citra*	$18.29	$16.44	$120.84	$106.27	$1,933.87	$1,660.75	NA	NA	NA	NA
564	SVSSFLXARS0 - Silver Springs Shores	NSN - Dunnellon*	$28.41	$25.05	$344.34	$296.29	$7,224.14	$6,105.00	$19,673.70	$16,620.38	$69,090.20	$58,289.53
565	SVSSFLXARS0 - Silver Springs Shores	NSN - McIntosh*	$18.29	$16.44	$120.84	$106.27	$1,933.87	$1,660.75	NA	NA	NA	NA
566	SVSSFLXARS0 - Silver Springs Shores	NSN - Orange Springs*	$18.29	$16.44	$120.84	$106.27	$1,933.87	$1,660.75	NA	NA	NA	NA
567	SVSSFLXARS0 - Silver Springs Shores	WLWDFLXARS0 - Wildwood	$34.59	$31.06	$197.77	$172.24	$3,604.16	$3,069.81	$9,788.25	$8,333.04	$33,992.68	$28,882.81
568	TLCHFLXARS0 - Trilacoochee	BSHNFLXADS0 - Bushnell	$39.40	$35.06	$303.95	$260.77	$6,576.27	$5,548.71	$17,919.24	$15,114.80	$63,068.75	$53,134.61
569	TLCHFLXARS0 - Trilacoochee	NSN - Brooksville*	$17.29	$15.61	$98.79	$87.88	$1,316.51	$1,145.84	NA	NA	NA	NA
570	TLCHFLXARS0 - Trilacoochee	NSN - Zephyrhills*	$17.29	$15.61	$98.79	$87.88	$1,316.51	$1,145.84	NA	NA	NA	NA
571	TLHSFLXADS0 - Calhoun	NSN - Alligator Point*	$17.41	$15.79	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	NA	NA
572	TLHSFLXADS0 - Calhoun	NSN - Bristol*	$17.41	$15.79	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	NA	NA
573	TLHSFLXADS0 - Calhoun	NSN - Carrabelle*	$17.41	$15.79	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	NA	NA
574	TLHSFLXADS0 - Calhoun	NSN - Chattahoochee*	$17.41	$15.79	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	NA	NA
575	TLHSFLXADS0 - Calhoun	NSN - Greensboro*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
576	TLHSFLXADS0 - Calhoun	NSN - Gretna*	$19.57	$17.51	$149.09	$129.82	$2,724.47	$2,320.16	$7,399.60	$6,298.50	NA	NA
577	TLHSFLXADS0 - Calhoun	NSN - Havana*	$18.49	$16.69	$42.49	$37.26	$706.44	$605.14	$1,914.68	$1,639.22	NA	NA
578	TLHSFLXADS0 -	NSN -	$17.41	$15.79	$25.14	$22.80	$220.85	$200.13	$586.22	$531.19	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
	~~Calhoun~~	~~Hosford*~~										
579	TLHSFLXADS0 - Calhoun	NSN - Perry*	$25.13	$22.14	$271.83	$232.16	$6,160.21	$5,185.75	$16,798.97	$14,138.17	NA	NA
580	TLHSFLXADS0 - Calhoun	NSN - Quincy*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
581	TLHSFLXADS0 - Calhoun	TLHSFLXBDS0 - Willis	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
582	TLHSFLXADS0 - Calhoun	TLHSFLXCDS0 - Mabry	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
583	TLHSFLXADS0 - Calhoun	TLHSFLXEDS0 - FSU	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
584	TLHSFLXADS0 - Calhoun	TLHSFLXHDS0 - Perkins	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
585	TLHSFLXADS0 - Calhoun	TVRSFLXADS0 - Thomasville	$28.13	$25.50	$55.08	$49.60	$575.91	$512.21	$1,539.59	$1,368.62	$5,000.68	$4,436.04
586	TLHSFLXBDS0 - Willis	NSN - Alligator Point*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
587	TLHSFLXBDS0 - Willis	NSN - Bristol*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
588	TLHSFLXBDS0 - Willis	NSN - Carrabelle*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
589	TLHSFLXBDS0 - Willis	NSN - Chattahoochee*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
590	TLHSFLXBDS0 - Willis	NSN - Greensboro*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
591	TLHSFLXBDS0 - Willis	NSN - Gretna*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
592	TLHSFLXBDS0 - Willis	NSN - Havana*	$18.49	$16.69	$42.49	$37.26	$706.44	$605.14	$1,914.68	$1,639.22	NA	NA
593	TLHSFLXBDS0 - Willis	NSN - Hosford*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
594	TLHSFLXBDS0 - Willis	NSN - Quincy*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
595	TLHSFLXCDS0 - Mabry	NSN - Alligator Point*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
596	TLHSFLXCDS0 - Mabry	NSN - Bristol*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
597	TLHSFLXCDS0 - Mabry	NSN - Carrabelle*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
598	TLHSFLXCDS0 - Mabry	NSN - Chattahoochee*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
599	TLHSFLXCDS0 - Mabry	NSN - Greensboro*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
600	TLHSFLXCDS0 - Mabry	NSN - Gretna*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
601	TLHSFLXCDS0 - Mabry	NSN - Havana*	$18.49	$16.69	$42.49	$37.26	$706.44	$605.14	$1,914.68	$1,639.22	NA	NA
602	TLHSFLXCDS0 - Mabry	NSN - Hosford*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
603	TLHSFLXCDS0 - Mabry	NSN - Quincy*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
604	TLHSFLXCDS0 - Mabry	TLHSFLXBDS0 - Willis	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
605	TLHSFLXCDS0 - Mabry	TLHSFLXHDS0 - Perkins	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
606	TLHSFLXCDS0 - Mabry	TVRSFLXADS0 - Thomasville	$31.29	$28.30	$124.80	$111.41	$1,561.76	$1,366.33	$4,200.70	$3,672.66	$14,011.84	$12,217.16
607	TLHSFLXDDS0 - Blairstone	NSN - Alligator Point*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
608	TLHSFLXDDS0 - Blairstone	NSN - Bristol*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
609	TLHSFLXDDS0 - Blairstone	NSN - Carrabelle*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
610	TLHSFLXDDS0 - Blairstone	NSN - Chattahoochee*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
611	TLHSFLXDDS0 - Blairstone	NSN - Greensboro*	$19.57	$17.51	$149.09	$129.82	$2,724.47	$2,320.16	$7,399.60	$6,298.50	NA	NA
612	TLHSFLXDDS0 - Blairstone	NSN - Gretna*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
613	TLHSFLXDDS0 - Blairstone	NSN - Havana*	$19.26	$17.25	$142.37	$124.22	$2,536.58	$2,163.45	$6,885.57	$5,869.76	NA	NA
614	TLHSFLXDDS0 - Blairstone	NSN - Hosford*	$18.48	$16.60	$125.03	$109.76	$2,050.99	$1,758.44	$5,557.11	$4,761.74	NA	NA
615	TLHSFLXDDS0 - Blairstone	NSN - Quincy*	$19.57	$17.51	$149.09	$129.82	$2,724.47	$2,320.16	$7,399.60	$6,298.50	NA	NA
616	TLHSFLXDDS0 - Blairstone	TLHSFLXADS0 - Calhoun	$29.14	$26.35	$77.48	$68.28	$1,203.03	$1,035.26	$3,255.25	$2,799.59	$11,135.77	$9,553.21
617	TLHSFLXDDS0 - Blairstone	TLHSFLXBDS0 - Willis	$29.14	$26.35	$77.48	$68.28	$1,203.03	$1,035.26	$3,255.25	$2,799.59	$11,135.77	$9,553.21
618	TLHSFLXDDS0 - Blairstone	TLHSFLXCDS0 - Mabry	$32.30	$29.15	$147.20	$130.09	$2,188.88	$1,889.38	$5,916.36	$5,103.63	$20,146.94	$17,334.33
619	TLHSFLXDDS0-	TLHSFLXEDS0 -	$32.30	$29.15	$147.20	$130.09	$2,188.88	$1,889.38	$5,916.36	$5,103.63	$20,146.94	$17,334.33

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
	Blairstone	FSU										
620	TLHSFLXDDS0 - Blairstone	TLHSFLXHDS0 - Perkins	$32.30	$29.15	$147.20	$130.09	$2,188.88	$1,889.38	$5,916.36	$5,103.63	$20,146.94	$17,334.33
621	TLHSFLXDDS0 - Blairstone	TVRSFLXADS0 - Thomasville	$31.64	$28.59	$132.56	$117.88	$1,778.93	$1,547.46	$4,794.84	$4,168.21	$16,136.45	$13,989.25
622	TLHSFLXEDS0 - FSU	NSN - Alligator Point	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
623	TLHSFLXEDS0 - FSU	NSN - Bristol*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
624	TLHSFLXEDS0 - FSU	NSN - Carrabelle*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
625	TLHSFLXEDS0 - FSU	NSN - Chattahoochee*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
626	TLHSFLXEDS0 - FSU	NSN - Greensboro*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
627	TLHSFLXEDS0 - FSU	NSN - Gretna*	$17.54	$15.81	$104.28	$92.46	$1,470.24	$1,274.06	$3,968.30	$3,436.57	NA	NA
628	TLHSFLXEDS0 - FSU	NSN - Havana*	$18.49	$16.69	$42.49	$37.26	$706.44	$605.14	$1,914.68	$1,639.22	NA	NA
629	TLHSFLXEDS0 - FSU	NSN - Hosford*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
630	TLHSFLXEDS0 - FSU	NSN - Quincy*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
631	TLHSFLXEDS0 - FSU	TLHSFLXBDS0 - Willis	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
632	TLHSFLXEDS0 - FSU	TLHSFLXCDS0 - Mabry	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
633	TLHSFLXEDS0 - FSU	TLHSFLXHDS0 - Perkins	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
634	TLHSFLXEDS0 - FSU	TVRSFLXADS0 - Thomasville	$31.29	$28.30	$124.80	$111.41	$1,561.76	$1,366.33	$4,200.70	$3,672.66	$14,011.84	$12,217.16
635	TLHSFLXFDS0 - Thomasville	NSN - Alligator Point*	$16.45	$14.91	$80.22	$72.40	$796.76	$712.34	$2,125.81	$1,899.82	NA	NA
636	TLHSFLXFDS0 - Thomasville	NSN - Bristol*	$16.45	$14.91	$80.22	$72.40	$796.76	$712.34	$2,125.81	$1,899.82	NA	NA
637	TLHSFLXFDS0 - Thomasville	NSN - Carrabelle*	$16.45	$14.91	$80.22	$72.40	$796.76	$712.34	$2,125.81	$1,899.82	NA	NA
638	TLHSFLXFDS0 - Thomasville	NSN - Chattahoochee*	$16.45	$14.91	$80.22	$72.40	$796.76	$712.34	$2,125.81	$1,899.82	NA	NA
639	TLHSFLXFDS0 - Thomasville	NSN - Greensboro*	$17.54	$15.81	$104.28	$92.46	$1,470.24	$1,274.06	$3,968.30	$3,436.57	NA	NA

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
640	TLHSFLXFDS0 - Thomasville	NSN - Gretna*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
641	TLHSFLXFDS0 - Thomasville	NSN - Havana*	$17.24	$15.56	$97.57	$86.86	$1,282.35	$1,117.35	$3,454.27	$3,007.84	NA	NA
642	TLHSFLXFDS0 - Thomasville	NSN - Hosford*	$16.45	$14.91	$80.22	$72.40	$796.76	$712.34	$2,125.81	$1,899.82	NA	NA
643	TLHSFLXFDS0 - Thomasville	NSN - Quincy*	$17.54	$15.81	$104.28	$92.46	$1,470.24	$1,274.06	$3,968.30	$3,436.57	NA	NA
644	TLHSFLXFDS0 - Thomasville	TLHSFLXBDS0 - Willis	$31.29	$28.30	$124.80	$111.41	$1,561.76	$1,366.33	$4,200.70	$3,672.66	$14,011.84	$12,217.16
645	TLHSFLXHDS0 - Perkins	NSN - Alligator Point*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
646	TLHSFLXHDS0 - Perkins	NSN - Bristol*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
647	TLHSFLXHDS0 - Perkins	NSN - Carrabelle*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
648	TLHSFLXHDS0 - Perkins	NSN - Chattahoochee*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
649	TLHSFLXHDS0 - Perkins	NSN - Greensboro*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
650	TLHSFLXHDS0 - Perkins	NSN - Gretna*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
651	TLHSFLXHDS0 - Perkins	NSN - Havana*	$18.49	$16.69	$42.49	$37.26	$706.44	$605.14	$1,914.68	$1,639.22	NA	NA
652	TLHSFLXHDS0 - Perkins	NSN - Hosford*	$17.11	$15.46	$94.86	$84.61	$1,206.70	$1,054.26	$3,247.33	$2,835.23	NA	NA
653	TLHSFLXHDS0 - Perkins	NSN - Quincy*	$18.90	$17.04	$49.20	$42.86	$894.33	$761.86	$2,428.71	$2,067.95	NA	NA
654	TLHSFLXHDS0 - Perkins	TLHSFLXBDS0 - Willis	$28.79	$26.05	$69.72	$61.81	$985.85	$854.12	$2,661.11	$2,304.04	$9,011.17	$7,781.12
655	TLHSFLXHDS0 - Perkins	TVRSFLXADS0 - Thomasville	$31.29	$28.30	$124.80	$111.41	$1,561.76	$1,366.33	$4,200.70	$3,672.66	$14,011.84	$12,217.16
656	TVRSFLXADS0 - Tavares	UMTLFLXARS0 - Umatilla	$34.39	$30.89	$193.32	$168.54	$3,479.72	$2,966.01	$9,447.79	$8,049.07	NA	NA
657	WCHLFLXADS0 - Wauchula	ZLSPFLXARS0 - Zolfo Springs	$38.54	$34.18	$284.88	$241.19	$7,008.14	$5,877.04	$19,136.71	$16,045.73	$67,927.20	$56,921.88
658	WLSTFLXARS0 - Williston	NSN - Bronson*	$22.08	$19.92	$100.36	$89.19	$1,360.43	$1,182.48	NA	NA	NA	NA
659	WNDRFLXARS0 - Windermere	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
660	WNDRFLXARS0-	NSN -	$21.54	$19.15	$192.59	$166.09	$3,942.11	$3,335.74	$10,730.77	$9,076.90	$37,615.51	$31,772.00

APPENDIX A - DEDICATED INTEROFFICE TRANSPORT PRICE LIST - SPRINT & COMMISSION												
	ORIGINATING	TERMINATING	DS0		DS1		DS3		OC3		OC12	
			Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved	Sprint Prop.	Comm. Approved
	Windermere	East Orange*										
661	WNDRFLXARS0 - Windermere	NSN - Lake Buena Vista*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
662	WNDRFLXARS0 - Windermere	NSN - Orlando*	$21.54	$19.15	$192.59	$166.09	$3,942.11	$3,335.74	$10,730.77	$9,076.90	$37,615.51	$31,772.00
663	WNDRFLXARS0 - Windermere	WNGRFLXADS0 - Winter Garden	$32.31	$28.99	$147.48	$126.64	$3,162.47	$2,669.54	$8,615.82	$7,270.65	$30,304.97	$25,541.88
664	WNDRFLXARS0 - Windermere	WNPKFLXADS1 - Winter Park	$32.31	$28.99	$147.48	$126.64	$3,162.47	$2,669.54	$8,615.82	$7,270.65	$30,304.97	$25,541.88
665	WNGRFLXADS0 - Winter Garden	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
666	WNGRFLXADS0 - Winter Garden	NSN - East Orange*	$21.24	$18.90	$186.05	$160.64	$3,759.10	$3,183.10	$10,230.09	$8,659.31	$35,825.11	$30,278.66
667	WNGRFLXADS0 - Winter Garden	NSN - Lake Buena Vista*	$20.46	$18.25	$168.88	$146.32	$3,278.39	$2,782.16	$8,914.98	$7,562.42	$31,122.33	$26,356.16
668	WNGRFLXADS0 - Winter Garden	NSN - Orlando*	$21.24	$18.90	$186.05	$160.64	$3,759.10	$3,183.10	$10,230.09	$8,659.31	$35,825.11	$30,278.66
669	WNGRFLXADS0 - Winter Garden	WNPKFLXADS1 - Winter Park	$32.02	$28.74	$140.95	$121.19	$2,979.45	$2,516.90	$8,115.15	$6,853.05	$28,514.57	$24,048.54
670	WNPKFLXADS1 - Winter Park	NSN - Celebration*	$21.23	$18.89	$185.79	$160.42	$3,751.78	$3,176.99	$10,210.07	$8,642.60	NA	NA
671	WNPKFLXADS1 - Winter Park	NSN - DeBary*	$21.25	$19.08	$186.29	$164.52	$2,800.15	$2,415.15	$7,570.68	$6,525.69	NA	NA
672	WNPKFLXADS1 - Winter Park	NSN - East Orange*	$14.86	$13.41	$45.10	$39.44	$779.64	$666.20	$2,114.95	$1,806.25	$7,310.54	$6,230.12
673	WNPKFLXADS1 - Winter Park	NSN - Geneva*	$14.86	$13.41	$45.10	$39.44	$779.64	$666.20	$2,114.95	$1,806.25	$7,310.54	$6,230.12
674	WNPKFLXADS1 - Winter Park	NSN - Lake Buena Vista*	$20.46	$18.25	$168.88	$146.32	$3,278.39	$2,782.16	$8,914.98	$7,562.42	$31,122.33	$26,356.16
675	WNPKFLXADS1 - Winter Park	NSN - Orlando*	$14.86	$13.41	$45.10	$39.44	$779.64	$666.20	$2,114.95	$1,806.25	$7,310.54	$6,230.12
676	WNPKFLXADS1 - Winter Park	NSN - Oviedo*	$14.86	$13.41	$45.10	$39.44	$779.64	$666.20	$2,114.95	$1,806.25	$7,310.54	$6,230.12
678	WNPKFLXADS1 - Winter Park	NSN - Sanford*	$17.70	$16.04	$29.94	$26.80	$355.06	$312.07	$953.38	$837.43	NA	NA
679	WSTVFLXARS0 - Westville	NSN - Graceville*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA
680	WSTVFLXARS0 - Westville	NSN - Vernon*	$17.95	$16.16	$113.43	$100.09	$1,726.45	$1,487.76	$4,669.25	$4,021.21	NA	NA

*** Non-Sprint Terminating Office**

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION

	ELEMENT DESCRIPTION	ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
1	**SERVICE ORDERS**					
2	Manual Service Order			$28.10		$28.10
3	Manual Service Order -Listing Only			$14.81		$14.81
4	Manual Service Order - Change Only			$13.76		$13.76
5						
6	Electronic Service Order			$3.82		$3.82
7	Electronic Service Order - Listing Only			$0.42		$0.42
8	Electronic Service Order - Change Only			$1.66		$1.66
9						
10	**LNP Administrative Charge**			$8.11		$8.11
11						
12	**ANALOG LOOPS**					
13	**2-Wire Analog**	1	$18.58		$10.82	
14		2	$30.26		$17.63	
15		3	$66.91		$24.69	
16		4			$45.40	
17	2-Wire New (w/ NID)			$119.74		$119.74
18	2-Wire New (w/o NID)			$111.24		$111.24
19	2-Wire New, Add'l or Second Line (same time)			$52.73		$52.73
20	2-Wire New Re-install (Cut thru and Dedicated/Vacant)			$65.81		$65.81
21	2-Wire Disconnect			$31.75		$31.75
22	**4-Wire Analog**	1	$35.15		$20.86	
23		2	$58.41		$34.00	
24		3	$131.54		$47.60	
25		4			$87.54	
26	4-Wire New (w/ NID)			$152.83		$152.83
27	4-Wire New (w/o NID)			$144.33		$144.33
28	4-Wire New, Add'l or Second Line (same time)			$85.82		$85.82

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
29	4-Wire New Re-install (Cut thru and Dedicated/Vacant)			$81.70		$81.70
30	4-Wire Disconnect			$36.47		$36.47
31	**PRE-ORDER LOOP QUALIFICATION**					
32	Loop Make-Up Information			$37.55		$5.90[1]
33	**LOOP CONDITIONING - PER LINE**					
34	This charge applies to all digital UNEs, line sharing and xDSL cable loops that are shorter than 18,000 feet in length. Separate Engineering and Travel charges DO NOT apply as these costs reflect 25 pair economies.			$1.65		$0.00
35	**LOOP CONDITIONING - PER LOCATION**					
36	The following charge applies to all loops that are 18,000 feet in length or longer that require load coil removal.					
37	Engineering Charge - per loop			$39.11		$39.11
38	Trip charge - per location			$16.41		$16.41
39	Unload cable pair, per Underground location			$445.21		$445.21
40	Unload add'l cable pair, UG same time, same location and cable			$3.43		$3.43
41	Unload cable pair, per Aerial Location			$7.80		$7.80
42	Unload add'l cable par, AE, same time, location, and cable			$1.80		$1.80
43	Unload cable pair, per Buried Location			$7.80		$7.80
44	Unload add'l cable pair, BU, same time, location and cable			$1.80		$1.80
45						
46	The following charges apply to all loops of any length that require Bridged Tap or Repeater Removal.					

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
	ELEMENT DESCRIPTION	**ZONE**	**SPRINT'S PROPOSED RATES**		**COMMISSION APPROVED RATES**	
			RECURRING	**NON-RECURRING**	**RECURRING**	**NON-RECURRING**
47	Engineering Charge - per loop			$39.11		$39.11
48	Trip Charge - per location			$16.41		$16.41
49	Bridge Tap Removal; Any length					
50	Remove Bridge Tap, per Underground Location			$442.28		$442.28
51	Remove one (1) add'l Bridged Tap, UG same time, location and cable			$0.50		$0.50
52	Remove Bridged Tap, per Aerial Location			$6.43		$6.43
53	Remove one (1) add'l Bridged Tap, AE same time location and cable			$0.44		$0.44
54	Remove Bridged Tap, per Buried Location			$6.43		$6.43
55	Remove one (1) add'l Bridged Tap, BU same time, location, and cable			$0.44		$0.44
56	Repeater Removal; Any Length					
57	Remove Repeater; per Underground Location			$442.28		$442.28
58	Remove add'l Repeater, UG, same time, location and cable			$0.50		$0.50
59	Remove Repeater, per Aerial Location			$6.43		$6.43
60	Remove Add'l Repeater, AE, same time, location and cable			$0.44		$0.44
61	Remove Repeater, per Buried Location			$6.43		$6.43
62	Remove Add'l Repeater, BU, same time, location and cable			$0.44		$0.44
63						
64	**xDSL CAPABLE LOOPS**					
65	**2-Wire xDSL-capable Loop**	1	$18.58		$10.82	
66		2	$30.26		$17.63	
67		3	$66.91		$24.69	
68		4			$45.40	
69	2-Wire xDSL-capable Loop - First Line			$115.31		$115.31
70	2-Wire xDSL-capable Loop - Add'l or Second			$48.30		$48.30

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
	ELEMENT DESCRIPTION	**ZONE**	**SPRINT'S PROPOSED RATES**		**COMMISSION APPROVED RATES**	
			RECURRING	**NON-RECURRING**	**RECURRING**	**NON-RECURRING**
	Line					
71	2-Wire xDSL-capable Loop - Re-install (Cut Thru and Dedicated/Vacant)			$63.55		$63.55
72	2 Wire Disconnect			$31.75		$31.75
73						
74	**4-Wire xDSL-capable Loop**	1	$35.15		$20.79	
75		2	$58.41		$33.89	
76		3	$131.54		$47.44	
77		4			$87.25	
78						
79	4-Wire xDSL-capable Loop - First Line			$146.73		$146.73
80	4-Wire xDSL-capable Loop - Add'l or Second Line			$79.72		$79.72
81	4-Wire xDSL-capable Loop - Re-install (Cut Thru and Dedicated/Vacant)			$78.59		$78.59
82	4 Wire Disconnect			$36.47		$36.47
83						
84	**DIGITAL LOOPS**					
85	**2-Wire Digital Loop**	1	$18.58		$10.82	
86		2	$30.26		$17.63	
87		3	$66.91		$24.69	
88		4			$45.40	
89	2-Wire New, First Line (w/NID)			$177.64		$177.64
90	2-Wire New, First Line (w/o NID)			$169.14		$169.14
91	2-Wire New, Add'l or Second Line			$108.10		$108.10
92	2-Wire Disconnect			$31.75		$31.75
93						
94	**Digital 56k/64k Loop**	1	$39.24		$19.00	
95		2	$52.18		$30.97	
96		3	$94.15		$43.36	

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
97		4			$79.75	
98	Digital 56k / 64k New, First Line (w/ NID)			$177.64		$177.64
99	Digital 56k / 64k New, First Line (w/o NID)			$169.14		$169.14
100	Digital 56k / 64k New, Add'l or Second Line			$108.10		$108.10
101	2-Wire Disconnect			$31.75		$31.75
102						
103	**2-Wire ISDN/BRI Loop**	1	$35.81		$19.10	
104		2	$52.52		$31.13	
105		3	$108.87		$43.59	
106		4			$80.16	
107	2-Wire ISDN/BRI New, First Line (w/ NID)			$177.64		$177.64
108	2-Wire ISDN/BRI New, First Line (w/o NID)			$169.14		$169.14
109	2-Wire ISDN/BRI New, Add'l or Second Line			$108.10		$108.10
110	2-Wire Disconnect			$31.75		$31.75
111						
112	**4-Wire Digital Loop**	1	$35.15		$20.86	
113		2	$58.41		$34.00	
114		3	$131.54		$47.60	
115		4			$87.54	
116	4-Wire New, First Line (w/NID)			$249.39		$249.39
117	4-Wire New, First Line (w/o NID)			$240.90		$240.90
118	4-Wire New, Add'l or Second Line			$179.85		$179.85
119	4 Wire Disconnect			$36.47		$36.47
120						
121	**DS1 Service**	1	$211.37		$86.90	
122		2	$219.26		$141.64	
123		3	$418.09		$198.29	
124		4			$364.70	

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
125	DS1 Service New, First Line			$334.38		$334.38
126	DS1 Service New, First Line (w/o NID)			$325.88		$325.88
127	DS1 Service New, Add'l or Second Line			$177.61		$177.61
128	DS1 Disconnect			$36.47		$36.47
129						
130	**DARK FIBER LOOPS**					
131	Interoffice, per Foot Per Fiber		$0.0048		$0.0039	
132	Feeder, per Fiber - Statewide Average		$287.27		$235.53	
133	Distribution Price Per Fiber		$58.29		$47.79	
134	Fiber Patch Cord, per Fiber		$0.82		$0.82	
135	Initial Patch Cord Installation, Field Location			$22.92		$22.92
136	Additional Patch Cord Installation, Field Location, Same Time, Same Location			$7.64		$7.64
137	Central Office Interconnection, 1-4 Patch Cords, per C.O.			$193.55		$193.55
138	Dark Fiber Quote Preparation Charge			$270.47		$270.47
139	Fiber Patch Panel, per fiber		$0.79		$0.79	
140	Special Construction for Fiber Pigtail			ICB		ICB
141						
142	**SUB-LOOPS**					
143	**Sub-Loops Interconnection (Stub Cable)**			ICB		ICB
144	2-Wire Feeder	1	$12.10		$6.78	
145		2	$17.90		$11.04	
146		3	$45.07		$15.46	
147		4			$28.44	
148	2-Wire Feeder First Line			$88.72		$88.72

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
149	2-Wire Feeder Add'l or Second Line			$42.43		$42.43
150	2-Wire Feeder Disconnect Charge			$31.75		$31.75
151						
152	2-Wire Distribution	1	$6.48		$4.15	
153		2	$12.48		$6.76	
154		3	$23.86		$9.46	
155		4			$17.40	
156	2-Wire Distribution First Line			$127.65		$127.65
157	2-Wire Distribution Add'l or Second Line			$40.65		$40.65
158	2-Wire Distribution Disconnect Charge			$51.98		$51.98
159						
160	4-Wire Feeder	1	$23.19		$12.98	
161		2	$34.32		$21.15	
162		3	$86.42		$29.61	
163		4			$54.46	
164	4-Wire Feeder First Line			$122.84		$122.84
165	4-Wire Feeder Add'l or Second Line			$66.12		$66.12
166	4-Wire Feeder Disconnect Charge			$36.47		$36.47
167						
168	4-Wire Distribution	1	$12.43		$7.94	
169		2	$23.94		$12.95	
170		3	$45.75		$18.13	
171		4			$33.34	
172	4-Wire Distribution First Line			$173.06		$173.06
173	4-Wire Distribution Add'l or Second Line			$65.20		$65.20
174	4-Wire Distribution Disconnect Charge			$63.31		$63.31
175						
176	**HIGH-CAPACITY LOOPS**					
177	**DS-3**					

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
178	Per DS-3, both ends		$1,485.46	$109.19	$1,286.78	$109.19
179	**OC-3**					
180	Single termination, per OC-3 terminal		$749.53	$109.19	$673.94	$109.19
181	DS-3 Bandwidth, single termination per DS-3 card		$106.50		$95.76	
182	**OC-12**					
183	Single termination per OC-12 terminal		$832.27	$109.19	$748.34	$109.19
184	DS-3 Bandwidth, single termination per quad DS-3 card		$92.18		$82.89	
185	OC-3 Bandwidth, single termination per OC-3 card		$168.07		$151.12	
186	**OC-48**					
187	Single termination per OC-48 terminal		$1,193.98	$109.19	$1,073.58	$109.19
188	DS-3 Bandwidth, single termination per quad DS-3 card		$82.19		$73.90	
189	OC-3 Bandwidth, single termination per OC-3 card		$69.32		$62.33	
190	OC-12 Bandwidth, single termination per OC-12 card		$131.83		$118.53	
191						
192	**LOCAL SWITCHING**					
193	**PBX Trunks**					
194	PBX Trunk Connection Analog		$5.82	$167.80	$5.28	$167.80
195	PBX Trunk Connection (DSO)		$5.82	$264.36	$5.28	$264.36
196	PBX Trunk Connections (DS1)		$139.75	$349.35	$126.91	$349.35
197						
198	**UNE Stand Alone Ports**					
199	Residential 1		$2.28		$2.07	
200	Business 1		$2.28		$2.07	
201	Key System		$2.28		$2.07	

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
202	CENTREX		$2.28		$2.07	
203	Pay Station		$2.44		$2.21	
204	DS-1		$139.64		$126.81	
205	BRI-ISDN		$13.42		$12.18	
206	PRI-ISDN		$201.55		$183.02	
207						
208	**Local Switching Usage, per MOU - Statewide Average**		$0.002274		$0.002099	
209						
210	**CUSTOMIZED ROUTING**					
211	Switch Analysis			$119.74		$119.74
212	Host Switch Translations			$2,394.81		$2,394.81
213	Remote Switch Translations			$1,796.10		$1,796.10
214						
215	**FEATURES**					
216	**Feature Packages**					
217	CCF Package		$0.36		$0.33	
218	CLASS Package		$5.49		$5.07	
219	CENTREX Package		$10.98	$29.65	$10.15	$29.65
220	ISDN Package		$6.92	$6.70	$6.41	$6.70
221						
222	**Individual Features**					
223	3 Way Conf/ Consult/Hold Transfer		$1.80	$18.77	$1.63	$18.77
224	Conf Calling - 6 Way Station Control		$2.56	$18.77	$2.32	$18.77
225	Dial Transfer to Tandem Tie Line		$0.13	$100.48	$0.12	$100.48
226	Direct Connect		$0.02	$18.77	$0.02	$18.77
227	Meet Me Conference		$17.20	$28.63	$15.61	$28.63
228	Multi-hunt Service		$0.11	$18.77	$0.10	$18.77
229						

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
	ELEMENT DESCRIPTION	**ZONE**	**SPRINT'S PROPOSED RATES**		**COMMISSION APPROVED RATES**	
			RECURRING	**NON-RECURRING**	**RECURRING**	**NON-RECURRING**
230	**TANDEM SWITCHING**					
231	Tandem Switching per MOU - Statewide Average		$0.002213		$0.002053	
232						
233	**TRANSPORT**					
234	Transport - DSO Dedicated - Install		Dedicated Transport Price List	$192.85	Dedicated Transport Price List	$192.85
235	Transport - DS1 Dedicated - Install		Dedicated Transport Price List	$182.15	Dedicated Transport Price List	$182.15
236	Transport - DS3 Dedicated - Install		Dedicated Transport Price List	$192.85	Dedicated Transport Price List	$192.85
237	Transport - OC3 Dedicated		Dedicated Transport Price List	$192.85	Dedicated Transport Price List	$192.85
238	Transport - OC12 Dedicated		Dedicated Transport Price List	$192.85	Dedicated Transport Price List	$192.85
239						
240	DS1 to DS1 Cross Connect			$182.15		$182.15
241	DS3 to DS3 Cross Connect			$192.85		$192.85
242	OC3 to OC3 Cross Connect			$192.85		$192.85
243	OC12 to OC12 Cross Connect			$192.85		$192.85
244						
245	Dark Fiber Transport -Initial Installation, 1-4 Patch Cords, per CO			$193.55		$193.55
246						
247	Common Transport, per minute of use		$0.000947		$0.000814	
248						

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
249	**911 AND E911 DATABASE ACCESS**					
250	911 Trunk 2 Wire Analog			$151.80		$151.80
251	DS-0 transport to Sprint's 911 tandem office		Dedicated Transport Price List	$192.85	Dedicated Transport Price List	$192.85
252						
253	**MULTIPLEXING**					
254	Multiplexing - DS1-DSO (Mux 1/0 Common Equipment)		$179.10	$93.62	$162.48	$93.62
255	Multiplexing - DS3-DS1 (M13 Multiplexer - per DS3)		$215.79	$119.88	$195.77	$119.88
256	D4 Channel Unit		$4.71		$4.27	
257	D4 OCU DP		$3.28		$2.98	
258	D4 ISDN U-Brite		$3.61		$3.28	
259						
260	**UNE COMBINATIONS**					
261	**UNE Platform**					
262	UNE-P 2-Wire Analog Loop, Switching, Common Transport	1	$16.96		$9.94	
263		2	$28.55		$16.21	
264		3	$66.21		$22.69	
265		4			$41.73	
266						
267	UNE-P 2-Wire Analog Loop w/NID - First Line, Switching, Common Transport			$119.74		$119.74
268	UNE-P 2-Wire Analog Loop w/NID - First Line, Switching, Common Transport			$111.24		$111.24
269	UNE-P 2-Wire Analog Loop - Add'l Line ordered same time to same location			$52.73		$52.73
270	UNE-P 2-Wire Analog Loop - Reinstall			$16.14		$16.14

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
	ELEMENT DESCRIPTION	**ZONE**	**SPRINT'S PROPOSED RATES**		**COMMISSION APPROVED RATES**	
			RECURRING	**NON-RECURRING**	**RECURRING**	**NON-RECURRING**
	Loop,Switching, Common Transport					
271	UNE-P 2-Wire Analog Loop - Voice Grade Migration from Resale			$20.80		$20.80
272	UNE-P 2-Wire Analog Loop - Disconnect Charge			$5.38		$5.38
273						
274	UNE-P ISDN/BRI Loop & Port Combination	1	$39.48		$21.20	
275		2	$55.87		$34.55	
276		3	$116.21		$48.37	
277		4			$88.97	
278	UNE-P ISDN/BRI Loop New, First Line (w/NID) & Port Combination			$177.64		$177.64
279	UNE-P ISDN/BRI Loop New, First Line (w/NID) & Port Combination			$169.14		$169.14
280	UNE-P ISDN/BRI Loop New, Add'l or Second Line & Port Combination			$108.10		$108.10
281	UNE-P ISDN-BRI Disconnect			$31.75		$31.75
282						
283	Usage, per MOU		See UNE Switching MOU Prices		See UNE Switching MOU Prices	
284	**ENHANCED EXTENDED LINK; DS0 LOOP, 1/0 MUX, DS1 TRANSPORT**					
285	DS0 Loop		See Loop UNE Prices		See Loop UNE Prices	
286	DS1 Transport		See Transport UNE Prices		See Transport UNE Prices	
287	Channel Bank Shelf/Common (per DS1)		$179.10		$162.48	
288	Channel Bank Card (per DS0)		$4.71		$4.27	
289						

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
290	**ENHANCED EXTENDED LINK; DS0 LOOP, DS0 TRANSPORT**					
291	EEL New 2-Wire Analog Loop, DS0 Transport			$312.59		$312.59
292	EEL New 4-Wire Analog Loop, DS0 Transport			$345.68		$345.68
293	EEL New 2-Wire Digital Loop, DS0 Transport			$370.49		$370.49
294	EEL New 4-Wire Digital Loop, DS0 Transport			$442.24		$442.24
295						
296	**ENHANCED EXTENDED LINK; DS0 LOOP, D4 CHANNELS, DS1 TRANSPORT**					
297	EEL New 2-Wire Analog Loop, D4 Channel, Dedicated DS1 Transport			$395.51		$395.51
298	EEL New 2-Wire Analog Loop, D4 Channel			$213.36		$213.36
299	EEL Add'l 2-Wire Analog Loop same time same location, D4 Channel			$146.35		$146.35
300	EEL New 2-Wire Analog - Disconnect Charge			$31.75		$31.75
301						
302	EEL New 4-Wire Analog Loop, D4 Channel, Dedicated DS1 Transport			$428.60		$428.60
303	EEL New 4-Wire Analog Loop, D4 Channel			$246.45		$246.45
304	EEL Add'l 4-Wire Analog Loop same time same location, D4 Channel			$179.44		$179.44
305	EEL New 4-Wire Analog - Disconnect Charge			$36.47		$36.47
306						
307	EEL New 2-Wire DS0 Digital Loop, D4 Channel, Dedicated DS1 Transport			$453.41		$453.41
308	EEL New 2-Wire DS0 Digital Loop, D4 Channel			$271.26		$271.26
309	EEL Add'l 2-Wire DS0 Digital Loop same time same location, D4 Channel			$201.72		$201.72
310	EEL New 2-Wire DS0 Digital Disconnect Charge			$31.75		$31.75
311						

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
	ELEMENT DESCRIPTION	**ZONE**	**SPRINT'S PROPOSED RATES**		**COMMISSION APPROVED RATES**	
			RECURRING	**NON-RECURRING**	**RECURRING**	**NON-RECURRING**
312	EEL New 4-Wire DS0 Digital Loop, D4 Channel, Dedicated DS1 Transport			$525.17		$525.17
313	EEL New 2-Wire DS0 Digital Loop, D4 Channel			$343.01		$343.01
314	EEL Add'l 4-Wire DS0 Digital Loop same time same location, D4 Channel			$273.47		$273.47
315	EEL New 4-Wire DS0 Digital Disconnect Charge			$36.47		$36.47
316						
317	**ENHANCED EXTENDED LINK, DS1 LOOP, DS1 TRANSPORT**					
318	DS1 Loop					
319	DS1 Transport					
320	EEL New DS1 Loop, DS1 Interoffice Transport			$516.53		$516.53
321	EEL DS1 Loop Disconnect Charge			$36.47		$36.47
322						
323	**ENHANCED EXTENDED LINK, DS1 LOOP, 3/1 MUX, DS3 TRANSPORT**					
324	DS1 Loop					
325	DS1 Transport					
326	3/1 Multiplexing (per DS3)					
327	EEL New DS1 Loop, 3/1 Multiplexing, DS3 Interoffice Transport			$647.11		$647.11
328	EEL New DS1 Loop, 3/1 Multiplexing			$454.26		$454.26
329	EEL Add'l DS1 Loop same time same location, 3/1 Multiplexing			$297.49		$297.49
330	EEL DS1 Loop Disconnect Charge			$36.47		$36.47
331						
332	**Enhanced Extended Link, DS3 Loop, DS3 Transport**					
333	EEL New DS3 Loop, DS3 Interoffice Transport			$494.89		$494.89
334						

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
	ELEMENT DESCRIPTION	ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
335	**Enhanced Extended Link Loop Transport Migrations**			$76.71		$76.71
336						
337	**COMMON CHANNEL SIGNALING**					
338	Interoffice Transmission - STP Ports		$279.17	$281.69	$252.47	$281.69
339	STP Switching		$0.36		$0.33	
340	STP Transport Link 56.0 Kbps SS7 Link per month - Interoffice transmission		Dedicated Transport & Multiplexing	$184.79	Dedicated Transport & Multiplexing	$184.79
341	STP Transport Link 1.544 Mbps SS7 Link per month		Dedicated Transport & Multiplexing	$184.79	Dedicated Transport & Multiplexing	$184.79
342	D4 Channel Units		$4.71		$4.27	
343	SS7 - Originating Point Code Service			$29.94		$29.94
344	SS7 - Global Title Address Translation			$14.97		$14.97
345						
346	**RECIPROCAL COMPENSATION**					
347	Local End Office Call Attempt (Setup)		$0.003861		$0.003640	
348	Local End Office MOU		$0.001535		$0.001408	
349	Tandem Call Attempt (Setup)		$0.003916		$0.003691	
350	Tandem MOU		$0.001341		$0.001231	
351	Tandem Transport MOU		$0.000947		$0.000814	
352						
353	**CALL-RELATED DATABASES SERVICES**					
354	LIDB Database per query		$0.012474		$0.012556	
355	Toll Free Code Access Service query		$0.001034		$0.000948	
356	Calling Name Delivery per query		$0.000864		$0.000786	
357	Local Number Portability per query		$0.001403		$0.001327	
358						
359	**OTHER CHARGES**					

APPENDIX A - RATE COMPARISON - SPRINT & COMMISSION						
ELEMENT DESCRIPTION		ZONE	SPRINT'S PROPOSED RATES		COMMISSION APPROVED RATES	
			RECURRING	NON-RECURRING	RECURRING	NON-RECURRING
360	NID Instillation			$8.50		$8.50
361	NID Connection - 2 Line		$0.96	$8.50	$0.82	$8.50
362	NID Connection - 4 Wire			$16.99		$16.99
363	25 Line		$12.40	Installed via Workorder	$10.63	Installed via Workorder
364	SmartJack		$8.86	$56.65	$7.60	$56.65
365	Trip Charge			$18.88		$18.88
366	2-Wire Digital Data Loop Cooperative Testing			$46.71		$46.71
367	4-Wire Digital Data Loop Cooperative Testing			$66.99		$66.99
368	Trouble Isolation and Testing			$48.47		$48.47
369	Dark Fiber End-to-End Testing, Initial Strand			$53.48		$53.48
370	Dark Fiber End-to-End Testing, Initial Strand			$15.28		$15.28
371	Tag & Label loop not ordered w/ loop installation			$9.44		$9.44
372	Tag & Label loop at same location and time			$3.78		$3.78
373	Tag & Label loop ordered w/ loop installation			$4.72		$4.72
374	UNE-P Telephone Number Change Charge			$14.66		$14.66
375	Non 10 Digit Trigger Charge for LNP - first 10 number ported			$47.33		$47.33
376	Non 10 Digit Trigger Charge for LNP - each add'l number ported			$4.24		$4.24

APPENDIX B - WIRE CENTERS BY ZONE			
CLLI Code	**Wire Center Name**	**Sprint Proposed**	**Commission Approved**
MTLDFLXADS1	Maitland	1	1
SHLMFLXADS0	Shalimar	1	1
TLHSFLXADS0	Tallahassee-Calhoun	1	1
TLHSFLXERS0	Tallahassee-FSU	1	1
ALSPFLXADS0	Altamonte Springs	1	2
BCGRFLXARS1	Boca Grande	1	2
BNSPFLXADS1	Bonita Springs	1	2
CPCRFLXADS0	Cape Coral	1	2
CSLBFLXADS1	Casselberry	1	2
CYLKFLXBRS0	Cypress Lake-Regional Airport	1	2
DESTFLXADS0	Destin	1	2
FTMBFLXARS0	Fort Myers Beach	1	2
FTMYFLXADS0	Fort Myers	1	2
FTMYFLXCDS2	Fort Myers	1	2
FTWBFLXADS0	Fort Walton Beach-Hollywood	1	2
FTWBFLXBDS0	Fort Walton Beach-Denton	1	2
FTWBFLXCRS0	Fort Walton Beach-Mary Esther	1	2
GLRDFLXADS0	Goldenrod	1	2
KSSMFLXDRS0	Buenaventura Lakes	1	2
LDLKFLXARS0	Lady Lake	1	2
LKBRFLXADS1	Lake Brantley	1	2
NNPLFLXADS1	North Naples	1	2
NPLSFLXDDS0	Naples	1	2
OCALFLXCRS0	Highlands	1	2
ORCYFLXADS0	Orange City	1	2
TLHSFLXBDS0	Tallahassee-Willis	1	2
TLHSFLXDDS0	Tallahassee- Blairstone	1	2

APPENDIX B - WIRE CENTERS BY ZONE			
CLLI Code	**Wire Center Name**	**Sprint Proposed**	**Commission Approved**
VLPRFLXADS0	Valparaiso	1	2
VLPRFLXBRS0	Valparaiso-Seminole	1	2
WNDRFLXARS0	Windermere	1	2
WNGRFLXADS0	Winter Garden	1	2
WNPKFLXADS1	Winter Park	1	2
APPKFLXADS1	Apopka	1	3
CLMTFLXADS0	Clermont	1	3
CPCRFLXBDS1	North Cape Coral	1	3
KSSMFLXADS0	Kissimmee	1	3
KSSMFLXBDS1	Reedy Creek	1	3
LSBGFLXADS0	Leesburg	1	3
MOISFLXADS1	Marco Island	1	3
NFMYFLXADS0	North Fort Myers	1	3
NPLSFLXCDS0	Naples	1	3
OCALFLXADS0	Ocala	1	3
ORCYFLXCRS0	Orange City	1	3
TLHSFLXCDS0	Tallahassee-Mabry	1	3
TLHSFLXHDS0	Tallahassee-Perkins	1	3
BLVWFLXADS0	Belleview	2	3
BVHLFLXADS0	Beverly Hills	2	3
CHSWFLXARS0	Chassahowitzka-Homosassa Spr.	2	3
CRVWFLXADS0	Crestview	2	3
CYLKFLXADS0	Cypress Lake	2	3
FTMYFLXBRS0	Fort Myers	2	3
GLGCFLXADS0	Golden Gate	2	3
KSSMFLXCRS1	Kissimmee	2	3
MTDRFLXARS0	Mount Dora	2	3

APPENDIX B - WIRE CENTERS BY ZONE			
CLLI Code	**Wire Center Name**	**Sprint Proposed**	**Commission Approved**
NFMYFLXBRS0	North Fort Myers	2	3
OCALFLXBDS0	Ocala	2	3
PTCTFLXADS0	Port Charlotte	2	3
SNISFLXADS0	Sanibel-Captiva Islands	2	3
SVSSFLXARS0	Silver Springs Shores	2	3
TLHSFLXFDS0	Tallahassee-Thomasville	2	3
TVRSFLXADS0	Tavares	2	3
AVPKFLXADS0	Avon Park	2	4
CPHZFLXADS0	Cape Haze	2	4
CRRVFLXADS0	Crystal River	2	4
DDCYFLXADS1	Dade City	2	4
ESTSFLXARS0	Eustis	2	4
FTMDFLXARS0	Fort Meade	2	4
HMSPFLXARS0	Homosassa Springs	2	4
HOWYFLXARS0	Howey-in-the-Hills	2	4
INVRFLXADS1	Inverness	2	4
LHACFLXADS0	Lehigh Acres	2	4
LKHLFLXARS0	Lake Helen-Orange City	2	4
MRNNFLXADS0	Marianna	2	4
MTVRFLXARS0	Montverde	2	4
PNGRFLXADS1	Punta Gorda	2	4
PNISFLXADS0	Pine Island	2	4
SBNGFLXADS1	Sebring	2	4
SGBHFLXARS0	Seagrove Beach	2	4
SNRSFLXARS0	Santa Rosa Beach	2	4
STCDFLXARS0	St. Cloud	2	4
SVSPFLXARS0	Silver Springs-Ocala	2	4

APPENDIX B - WIRE CENTERS BY ZONE			
CLLI Code	**Wire Center Name**	**Sprint Proposed**	**Commission Approved**
GVLDFLXARS0	Groveland	2	4
SNANFLXARS0	San Antonio	2	4
STRKFLXADS0	Starke	2	4
WCHLFLXADS0	Wauchula	2	4
ALFRFLXARS0	Alford	3	4
ALVAFLXARS1	Alva	3	4
ARCDFLXADS0	Arcadia	3	4
ASTRFLXARS0	Astor	3	4
BAKRFLXADS0	Baker	3	4
BNFYFLXARS0	Bonifay	3	4
BSHNFLXADS0	Bushnell	3	4
BWLGFLXARS0	Bowling Green	3	4
CFVLFLXADS0	Crawfordville	3	4
CHLKFLXARS0	Cherry Lake	3	4
CLTNFLXARS0	Clewiston	3	4
CTDLFLXARS0	Cottondale	3	4
DFSPFLXADS0	DeFuniak Springs	3	4
EVRGFLXARS1	Everglades	3	4
FRPTFLXARS0	Freeport	3	4
GDRGFLXADS0	Grand Ridge	3	4
GLDLFLXARS0	Glendale	3	4
GNVLFLXARS0	Greenville	3	4
GNWDFLXARS0	Greenwood	3	4
IMKLFLXARS0	Immokalee	3	4
KGLKFLXARS0	Kingsley Lake	3	4
KNVLFLXARS0	Kenansville	3	4
LBLLFLXADS0	LaBelle	3	4

APPENDIX B - WIRE CENTERS BY ZONE			
CLLI Code	Wire Center Name	Sprint Proposed	Commission Approved
LEE FLXARS0	Lee	3	4
LKPCFLXARS0	Lake Placid	3	4
LWTYFLXARS0	Lawtey	3	4
MALNFLXARS0	Malone	3	4
MDSNFLXADS0	Madison	3	4
MNTIFLXADS0	Monticello	3	4
MRHNFLXARS0	Moore Haven	3	4
OCNFFLXARS0	Forest	3	4
OKCBFLXADS1	Okeechobee	3	4
OKLWFLXADS0	Ocklawaha	3	4
PANCFLXARS0	Panacea	3	4
PNLNFLXARS0	Ponce de Leon	3	4
RYHLFLXARS0	Reynolds Hill	3	4
SLHLFLXARS0	Spring Lake	3	4
SNDSFLXARS0	Sneads	3	4
SPCPFLXARS0	Sopchoppy	3	4
SSPRFLXARS0	Salt Springs	3	4
STMKFLXARS0	St. Marks	3	4
TLCHFLXARS0	Trilacoochee	3	4
TLHSFLXGRS0	Tallahassee-Woodville	3	4
UMTLFLXARS0	Umatilla	3	4
WLSTFLXARS0	Williston	3	4
WLWDFLXARS0	Wildwood	3	4
WSTVFLXARS0	Westville	3	4
ZLSPFLXARS0	Zolfo Springs	3	4