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CABLE GRANDLAW

PLEASE REPLY TO:  
TALLAHASSEE

TALLAHASSEE OFFICE  
315 SOUTH CALHOUN STREET  
SUITE 716  
TALLAHASSEE, FLORIDA 32301  
TELEPHONE (904) 222-2525  
FAX (904) 222-5606

September 2, 1994

HAND DELIVERED

Blanca S. Bayo, Director  
Division of Records and Reporting  
101 E. Gaines Street  
Tallahassee, Florida 32301

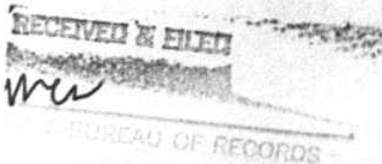
Re: In re: Petition for expanded interconnection for alternate access vendors within local exchange company central offices by Intermedia Communications of Florida, Inc.; Docket Nos.: 921074-TP, 930955-TL, 940014-TL, 940020-TL, 940190-TL

Dear Ms. Bayo:

Enclosed is the original and 15 copies of late-filed exhibit no. 39 (Gillan's workpapers). To preserve the parties' ability to guard the confidentiality of the information, I am submitting a non-confidential (redacted) version of the entire exhibit as well as a confidential version of only the pages containing confidential information (pages 1-2).

The confidential exhibit should be held in confidential status pursuant to the provisions and procedures of Rule 25-22.006, Florida Administrative Code. I will provide to United and to GTE only the portions of the confidential exhibit that pertain to each of them, respectively.

Thank you for your assistance.



Sincerely,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

VGK/bam

Enclosures

cc: Kim Caswell (Federal Express for delivery on 9/2)  
Mary Jo Peed (by hand delivery)  
John Fons (by hand delivery)  
All other parties of record (U. S. mail)

DOCUMENT NUMBER-DATE

09122 SEP-2 1994

FPC-RECORDS/REPORTING

Cost Comparisons: GTE

GTE



Estimating the Interoffice Cost Diff

	Fixed	Mileage
		
Diff	\$9.89	\$0.06

Cost Comparison: United

	Fixed	Mileage
United	[REDACTED]	[REDACTED]

Estimating the Interoffice Cost Diff

	Fixed	Mileage
[REDACTED]	[REDACTED]	[REDACTED]
Diff	\$8.83	(\$0.00)

Lightgate Interoffice Costs from Appendix C Workpaper 1a

Interoffice Tran	Fixed	Mileage
Band 0 - 8	\$518.93	\$21.65
Band 9 - 25	\$618.69	\$21.65
Band 26+	\$717.22	\$21.65
COCI per DS3	\$51.18	
COCI per 28 DS	\$342.67	
COCI per DS1	\$3.96	

Calculating an Average Fixed Charge

	Demand	Cost	Demand from Appendix B Workpaper 3 (pg 2 of 4)
Band 0 - 8	181	\$518.93	93926.33
Band 9 - 25	76	\$618.69	47020.44
Band 26+	14	\$717.22	10041.08
	271		\$557.15 Average Fixed Cost

Calculating the per DS1 cost of a DS3 in switched access configuration

Includes DS1 interface at switch

	Fixed	Mileage	
Cost of DS3	\$1,061.88	\$21.65	(fixed is average fixed + COCI-DS3 and COCI-DS1)
Cost per DS1	\$37.92	\$0.77	(above/28)
Cost of DS1	\$42.61	\$1.14	(provided from Transmittal 140)
Difference in C	\$4.69	\$0.37	

**BELLSOUTH**  
TELECOMMUNICATIONS

R W Fleming

1993 08 31 10 00 AM  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554  
404 475-4400

August 31, 1993

Transmittal No. 140

Secretary  
Federal Communications Commission  
Washington, D. C. 20554

Attention: Common Carrier Bureau

The accompanying tariff material, issued on behalf of BellSouth Telecommunications, Inc., and bearing Tariff F.C.C. No. 1, Access Service, is sent to you for publication in compliance with the Communications Act of 1934, as amended.

Scheduled to become effective October 15, 1993, this publication consists of tariff pages as indicated on the following check sheets:

<u>Tariff FCC No.</u>	<u>Check Sheet No.</u>
1	89th Revised Page 1
	34th Revised Page 2
	22nd Revised Page 5
	34th Revised Page 6

This publication is being issued to introduce Area Commitment Plan (ACP) in BellSouth's F.C.C. Tariff No. 1. Also, as a part of this filing, BellSouth introduces enhancements to its Channel Services Payment Plan (CSPP) by revising regulations regarding moves and termination liabilities. CSPP rate levels for DS1 High Capacity Service are adjusted to reflect the fact that changes were recently made to DS1 service month-to-month rates.

The original transmittal letter and check in the amount of \$490.00 were provided to R & S Couriers, Inc., for delivery to Mellon Bank, Pittsburgh, Pennsylvania on August 31, 1993. Acknowledgment of receipt of this publication is requested. A duplicate transmittal letter is enclosed for this purpose.

All correspondence and inquiries in connection with this filing should be addressed to me at BellSouth Telecommunications, Inc., 29G57 Southern Bell Center, 675 West Peachtree Street, N.E., Atlanta, Georgia 30375.

Very truly yours,

*Charles A. Jackson*  
for R. W. Fleming  
Operations Manager

Attachments  
Documentation  
Tariff Pages

Copy of Letter and Attachments, concurrently delivered to:  
Chief, Tariff Review Branch  
International Transcription Service  
Public Utilities Specialist

RESCORP TELECOMMUNICATIONS INC

APPENDIX B  
 WORKPAPER C  
 PAGE 2 OF 4

1 RECURRING UNIT COST DEVELOPMENT -  
 2 RATE ELEMENT SPECIFIC COSTS

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Service Name: DS1 ACCESS  
 Rate Element: Interoffice Channel - Fixed

14 TOTAL UNIT INVESTMENT	\$1 830.91
17 INVESTMENT RELATED UNIT CAPITAL COSTS	
18 Depreciation Expense	\$204.32
19 Cost of Money	\$144.41
20 Income Tax Expense	\$63.60
21 Total (LN18+LN19+LN20) .....	\$412.33
23 INVESTMENT RELATED UNIT OPERATING COSTS	
24 Maintenance Expense	\$14.16
25 Administrative Expense	\$62.67
26 Ad Valorem and Other Taxes	\$22.15
27 Total (LN24+LN25+LN26) .....	\$98.98
29 TOTAL INVESTMENT RELATED UNIT COSTS (LN21 + LN27) ..	\$511.31
31 NON-INVESTMENT RELATED UNIT COSTS .....	\$0.00
33 TOTAL UNIT ANNUAL COSTS (LN29+LN31).....	\$511.31
35 TOTAL UNIT MONTHLY COSTS (LN33/12).....	\$42.61
41 RATIO OF UNIT MONTHLY COSTS	
42 TO INVESTMENT (LN35/LN14) .....	0.0233

BELLSOUTH TELECOMMUNICATIONS INC

APPENDIX B  
 WORKPAPER 2  
 PAGE 3 OF 4

1 RECURRING UNIT COST DEVELOPMENT -  
 2 RATE ELEMENT SPECIFIC COSTS

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Service Name: DS1 ACCESS  
 Rate Element: Interoffice Channel - Per Mile

14 TOTAL UNIT INVESTMENT	\$50.18
17 INVESTMENT RELATED UNIT CAPITAL COSTS	
18 Depreciation Expense	\$4.52
19 Cost of Money	\$4.43
20 Income Tax Expense	\$1.95
21 Total (LN18+LN19+LN20)	\$10.90
23 INVESTMENT RELATED UNIT OPERATING COSTS	
24 Maintenance Expense	\$0.46
25 Administrative Expense	\$1.75
26 Ad Valorem and Other Taxes	\$0.81
27 Total (LN24+LN25+LN26)	\$2.82
29 TOTAL INVESTMENT RELATED UNIT COSTS (LN21+LN27)	\$13.72
31 NON-INVESTMENT RELATED UNIT COSTS	\$0.00
33 TOTAL UNIT ANNUAL COSTS (LN29+LN31)	\$13.72
35 TOTAL UNIT MONTHLY COSTS (LN33/12)	\$1.14
41 RATIO OF UNIT MONTHLY COSTS 42 TO INVESTMENT (LN35/LN14)	0.0228



**BELLSOUTH**  
TELECOMMUNICATIONS ©

R. W. Fleming  
Operations Manager  
Pricing

29G57 Southern Bell Center  
675 West Peachtree Street, N.E.  
Atlanta, GA 30375  
404 529-5634

July 31, 1992

Transmittal No. 53

Secretary  
Federal Communications Commission  
Washington, D. C. 20554

Attention: Common Carrier Bureau

The accompanying tariff material, issued on behalf of BellSouth Telecommunications, Inc. and bearing Tariff F.C.C. No. 1, Access Service, is sent to you for publication in compliance with Section 61.49 and the requirements of the Communications Act of 1934, as amended.

Scheduled to become effective September 14, 1992, this publication consists of tariff pages as indicated on the following check sheets:

Tariff F.C.C. No.

1

Check Sheet No.

31st Revised Page 1  
13th Revised Page 2  
15th Revised Page 4  
9th Revised Page 5  
9th Revised Page 6

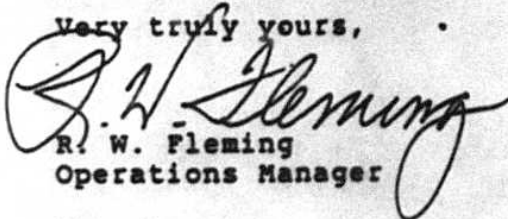
With this filing, BellSouth Telecommunications, Inc. is restructuring certain DS3 High Capacity services into LightGate<sup>®</sup> 1, 2, and 3 service, and is proposing a new service offering, LightGate 4 service. Additionally, two optional service features, Separate Alternate Facility Transport (SAFT) Level I and Level II, are being introduced. This filing also provides for these High Capacity services to be made available under Channel Services Payment Plan arrangements.

<sup>®</sup>Registered Service Mark of BellSouth Corporation

The original transmittal letter and check in the amount of \$490.00 were provided to R & S Couriers, Inc., for delivery to Mellon Bank, Pittsburgh, Pennsylvania on July 31, 1992. Acknowledgment of receipt of this publication is requested. A duplicate transmittal letter is enclosed for this purpose.

All correspondence and inquiries in connection with this filing should be addressed to me at BellSouth Telecommunications, Inc., 29G57 Southern Bell Center, 675 West Peachtree Street, N.E., Atlanta, Georgia 30375.

Very truly yours,



R. W. Fleming  
Operations Manager

Attachment  
Documentation  
Tariff Pages  
Tariff Review Plan (Paper and Diskette)

Copy of Letter and Attachment concurrently delivered to:  
Chief, Tariff Review Branch (Public Reference Copy)  
Downtown Copy Center  
Public Utilities Specialist



M E M O R A N D U M

September 2, 1994

TO:  DIVISION OF APPEALS  
 DIVISION OF AUDITING AND FINANCIAL ANALYSIS  
 DIVISION OF COMMUNICATIONS  
 DIVISION OF ELECTRIC AND GAS  
 DIVISION OF RESEARCH  
 DIVISION OF WATER AND WASTEWATER  
 DIVISION OF LEGAL SERVICES

FROM: DIVISION OF RECORDS AND REPORTING (FLYNN)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO. 09123-94  
0788-24

DESCRIPTION: Late-Filed Exhibit No. 39, pages 1 of 10  
and 2 of 10 (J. Gillan)

SOURCE: Interexchange Access Coalition

DOCKET NO.: 221074-21

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

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Please read each of the following and check if applicable.

The document(s) is (are), in fact, what the utility asserts it (them) to be.

The utility has provided enough details to perform a