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### BY HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-8850

### RE: Dockets No. 960833-TP, 960846-TP, 960757-TP and 971140-TP

Dear Ms. Bayo:

Enclosed for filing in the above referenced dockets are the following documents. With the exception of Mr. Gillan's testimony and AT&T's Prehearing Statement, all testimony and exhibits are jointly sponsored by on behalf of AT&T Communications of the Southern States, Inc. and MCI.

- 1. AT&T's Prehearing Statement and diskette copy;
- 2. Rebuttal testimony of John P. Lynott with rebuttal exhibits JPL-1 through JPL-3;
- 3. Rebuttal testimony of Rick Bissell (REDACTED) with rebuttal exhibit RB-1;
- 4. Rebuttal testimony of Lee Selwyn;
- 5. Rebuttal testimony of Bradford Cornell with rebuttal exhibit BC-1;
- 6. Rebuttal testimony of Michael J. Majoros, Jr., with rebuttal exhibit MJM-1;
- 7. Rebuttal testimony of Wayne Ellison with rebuttal exhibits WE-1 and WE-2;
- 8. Rebuttal testimony of James W. Wells, Jr. (REDACTED) with rebuttal exhibits JWW-1 through JWW-3 (JWW-2 and 3 REDACTED);
- 9. Rebuttal testimony of Art Lerma with rebuttal exhibits ALR-1 through ALR-11;
- 10. Rebuttal testimony of Catherine E. Petzinger (REDACTED);
- 11. Rebuttal testimony of Joseph Gillan.



By copy of this letter, these documents (with the exception of the diskette copy of the Prehearing Statement) have been provided to the parties on the attached service list. Copies of testimony and exhibits that include proprietary information are being filed under separate cover and will be served upon parties who have executed a confidentiality agreement.

Very truly yours,

Tracy W. Hatch

xc: Parties of record

### **CERTIFICATE OF SERVICE**

### **DOCKET NO. 960833-TP**

I HEREBY CERTIFY that a true and correct copy of the forgoing has been furnished by U.S. Mail or hand-delivery to the following parties of record this 4 day of December, 1997:

Ms. Nancy H. Sims BellSouth Telecommunications 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301

Richard Melson, Esquire Hopping Boyd Sams and Smith Post Office Box 6526 Tallahassee, Florida 32314

Floyd Self,Esquire Messer Caparello & Self, P.A. Post Office Box 1876 Tallahassee, FL 32302 Norman Horton, Esquire Messer Caparello & Self, P.A. Post Office Box 1876 Tallahassee, Florida 32302

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Tracy Hatch

# ORIGINAL

#### **BEFORE THE**

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## FLORIDA PUBLIC SERVICE COMMISSION

### **REBUTTAL TESTIMONY OF**

### JOHN P. LYNOTT

### **ON BEHALF OF**

# AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

AND

## MCI TELECOMMUNICATIONS CORPORATION

#### AND

## MCI METRO ACCESS TRANSMISSION SERVICES, INC.

Docket No. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP

December 9, 1997

DOCUMENT NUMBER-DATE 12596 DEC-951 FPSC-RECORDS/REPORTING

1		REBUTTAL TESTIMONY OF											
2		JOHN P. LYNOTT											
3		ON BEHALF OF											
4		AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., AND											
5		MCI TELECOMMUNICATIONS CORPORATION, AND											
6	MCI METRO ACCESS TRANSMISSION SERVICES, INC.												
7		DOCKET NOs.: 960833-TP/960846-TP/971140-TP/960757-TP/960916-TP											
8													
9	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND											
10		EMPLOYMENT.											
11	А.	My name is John P. Lynott, and my business address is 1875 Lawrence Street,											
12		Suite 875, Denver, Colorado 80202. I am employed by AT&T Communications											
13		as a District Manager in the Local Connectivity Costing and Pricing District of the											
14		Local Services Division.											
15													
16	Q.	ARE YOU THE SAME JOHN P. LYNOTT WHO FILED DIRECT											
17		TESTIMONY ON BEHALF OF AT&T AND MCI IN THIS											
18		PROCEEDING?											
19	А.	Yes.											
20													
21	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?											
22	А.	The purpose of my rebuttal testimony is to address: (1) the direct testimony of											
23		BellSouth witness Eno Landry concerning non-recurring costs (NRC), (2) certain											
24		deficiencies in BellSouth's non-recurring cost study, (3) modifications required to											
25		BellSouth's non-recurring cost study to efficiently provide the aforementioned											

elements, and (4) advantages of the AT&T/MCI Non-Recurring Cost Model
 (NRCM) for modeling BellSouth's non-recurring costs.

3

# 4 Q. DO YOU HAVE A SPECIFIC CONCERN WITH THE TESTIMONY OF 5 BELLSOUTH'S WITNESS ENO LANDRY?

Yes. In describing the major components contributing to non-recurring costs, Mr. 6 A. 7 Landry identifies the receiving and processing of the service request into an internal order as a BellSouth cost. This is also reflected in BellSouth's cost study 8 9 as cost associated with the Local Customer Service Center (LCSC). In a 10 competitive local environment, it is the responsibility of the Competitive Local 11 Exchange Carrier (CLEC) to process the local service order for BellSouth 12 The insertion of the LCSC work group in the ordering and provisioning. 13 provisioning processes is discriminatory to the CLEC. Such additional costs are 14 not being borne by BellSouth. Indeed, AT&T and BellSouth have an 15 Interconnection Agreement to provide for the mechanized flow of pre-ordering 16 and ordering service request data exchange.

17

# 18 Q. ARE THERE OTHER MODELING ERRORS IN THE BELLSOUTH 19 NON-RECURRING COST STUDIES?

A. Yes. AT&T and MCI joint witness Thomas Hyde discusses the methodological
and assumption concerns with the BellSouth studies. Highlights include
BellSouth's embedded cost nature (early 1990 sources with little to no detail of
functions being performed), inappropriate network architecture assumptions
(over-engineering and excess plant), which results in unnecessary work functions
that BellSouth does not experience itself, and duplicate work activities due to

1 BellSouth's treatment of each and every unbundled network element being 2 provisioned on separate orders. For example, a CLEC has no use for a standalone 3 loop without the loop being connected to a port or dedicated transport or its own 4 equipment located in collocation space.

5

# 6 Q. ARE OPERATIONAL SUPPORT SYSTEM ASSUMPTIONS 7 IMPORTANT TO THE DEVELOPMENT OF A NON-RECURRING COST 8 MODEL?

9 A. Yes. Telecommunications networks have evolved to the point where functions 10 such as billing, pre-ordering, ordering, provisioning and maintenance rely heavily 11 on efficient, high availability Operational Support Systems (OSSs) in order to 12 minimize non-recurring cost and maximize performance quality and reliability.

13

# 14 Q DO BELLSOUTH'S ASSUMPTIONS REGARDING OSSs NEGATIVELY 15 IMPACT THE MODELING OF NRCs?

Yes. First, assumptions regarding recovery of OSS investment are important. 16 Α The AT&T/MCI NRC Model does not capture OSS investment required for the 17 18 establishment and operation of the electronic gateway that serves as the medium 19 for CLEC/ILEC interfacing, because this Commission has already stated that 20 these cost will be borne by each individual provider. Charging such costs to new 21 entrants would be a barrier to competitive entry. Yet, in spite of this clear 22 direction from this Commission, BST has proposed to recover the costs of its 23 proposed electronic gateway through a separate charge assessed on each and every 24 order received from a CLEC for an unbundled element.

25

Additionally, BellSouth's current OSS investment (not the gateway to access 1 these OSSs) is being recovered through recurring rates, to the extent it needs to be 2 recovered at all. Mechanized OSS manages the totality of the telecommunications 3 4 network. Arguably, no OSS investment should result in any cost increase, even for recurring rates, because much, if not all, OSS investment is recovered through 5 efficiency gains that result from that investment. That is, investing in up-to-date 6 OSSs reduces costs for the ILEC, and, hence, the investment pays for itself over 7 8 time.

9

BellSouth fails to recognize the efficiencies of its own existing ('Legacy') OSSs. 10 BellSouth failed to consider the automated systems that are currently available to 11 support and replace manual activities/functions performed by their respective 12 work centers. BellSouth's non-recurring cost worksheets provide only a brief 13 description of the activities performed by these work centers. Having spent 14 several years dealing with service provisioning in an ILEC, work-times and work 15 groups indicated by BellSouth are overstated or unnecessary due to the many 16 advances in operational support systems. Rebuttal Exhibit JPL-1 is a table that 17 18 identifies certain work functions BellSouth includes in calculating non-recurring I have provided certain automated systems (OSS) that are currently 19 cost. available and their functionality as an example of why such manual work costs are 20 21 not warranted.

22

# Q. CAN YOU PROVIDE AN EXAMPLE OF NECESSARY ADJUSTMENTS TO BELLSOUTH'S NON-RECURRING COST STUDY?

A. Yes. Rebuttal Exhibit JPL-2 consists of (page 1 of 2) BellSouth's NRC Inputs for
 the 2-wire ADSL-compatible Loop and (page 2 of 2) Adjusted NRC Inputs for the
 2-wire ADSL-compatible Loop. The Adjusted NRC Inputs depiction also reflects
 the correction of modeling flaws as identified by AT&T/MCI witness Thomas
 Hyde.

6

# Q. WHAT IS THE PURPOSE OF THE PROPOSED CHANGES IN THE 8 BELLSOUTH COST STUDIES?

9 A. The recommended adjustments offer this Commission information to better
10 evaluate the BellSouth cost studies. The BellSouth cost study modifications are
11 necessary to more accurately portray BellSouth's own cost using efficient
12 practices, not the historic practices BellSouth is modeling.

13

14 In addition, the AT&T/MCI Non-Recurring Cost Model (NRCM) does not currently cost each of the specific non-recurring activities identified by this 15 16 Commission. The NRCM does, however, contain many of the necessary work 17 steps/activities and work times required to order and provision these unbundled 18 network elements. Following the NRCM's TSLRIC costing guidelines, 19 adjustments were made to recognize electronic ordering, efficiently managed 20 OSSs and forward-looking network architecture benefits. Necessary adjustments 21 to BellSouth's other filed studies is attached as Rebuttal Exhibit JPL-3. Certain 22 critical assumptions are provided, e.g., detailed work activities and times, as well 23 as a brief explanation where worktimes or probabilities, e.g. the probability of a 24 line served at a non-staffed central office affects travel, have been modified.

25

5

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#### 1 Q. PLEASE EXPLAIN YOUR ASSUMPTION ON FALLOUT?

The term used when orders do not flow through an OSS automatically is 2 Α. 3 "Fallout". Most ILEC systems are electronically linked and are dependent on one 4 another. Occasionally an error will occur as data flows through the systems, and this error will cause a service order to "fall out" of the systems, resulting in the 5 6 need for manual intervention. For example, in an electronic ordering process, if one of the OSSs receives erroneous or incompatible information from another 7 8 OSS, the order will be designated as a process "fallout" and may require manual 9 intervention to correct or complete the order.

10

It is important to note that the NRCM only considers "fallout" within the OSS managing the provisioning processes. Fallout during the pre-ordering and ordering processes (i.e., errors on the Local Service Request itself) are the responsibility of the CLEC to manually clear.

15

#### 16 Q. IS FALLOUT IMPORTANT TO MEASURING NRCs?

A. Absolutely. Fallout is important because in many instances it is the <u>only</u> cost
driver for an otherwise seamless electronic flow-through process. With OSSs that
are well managed and maintained, the rate of fallout is expected to be minimal,
especially in a competitive environment. This is a necessity because fallout
affects the customer in terms of longer delivery intervals and restoration/response
times, as well as higher cost of providing service; conditions a competitive
company can ill afford.

24

25

# 1 Q. DOES BELLSOUTH RECOGNIZE FALLOUT IN THEIR COST 2 STUDIES?

Yes. BellSouth, like several other ILECs, has assumed a significant degree of 3 Α. manual intervention in its OSS systems, such as COSMOS/SWITCH, PREMIS, 4 TIRKS, and LFACS. In fact, BellSouth assumes a 100% manual ordering and 5 provisioning process with no recognition of its OSS capabilities. For the reasons 6 discussed above, this assumption is invalid because it does not represent 7 efficiently managed and forward looking systems, and, accordingly, produces a 8 higher non-recurring cost than should be experienced even with the automatic 9 flow-through processes that actually exists today. In addition, BellSouth 10 11 introduces unnecessary workgroups, such as the LCSC and ACAC, to internally 12 rework orders that BellSouth deems contain CLEC order entry errors. Any manual assistance required to clear errors associated with the data on the Local Service 13 Order will be performed by the CLEC. Since all ordering errors, not provisioning 14 OSS fallout, can be 100% electronically returned to the CLEC, BellSouth 15 16 inappropriately overstates relevant non-recurring cost.

17

18 Q. IN ADDITION TO OSS, IS THE NETWORK ARCHITECTURE
 19 ASSUMPTION CRITICAL WHEN MODELING NON-RECURRING
 20 COSTS?

A. Yes. It's also important to understand and utilize forward looking network
 architectures in modeling non-recurring costs. For example, the NRCM utilizes
 Local Digital Switches ("LDS"), Integrated Digital Loop Carrier (IDLC/GR-303)
 for loops greater than 9 Kilofeet (for loops less than 9 Kilofeet, copper is
 assumed), Digital Cross-connect Systems ("DCS"), and Synchronous Optical

Network ("SONET") rings for transport. These architectures are important 1 2 because they are forward looking intelligent processor controlled network elements that can communicate over standard interfaces to the OSSs in such a 3 manner that little-or-no manual intervention is required for provisioning or 4 5 maintenance activities. These architectures are also the ones currently being deployed by BellSouth today. Technologies such as these work hand-in-hand 6 7 with advanced OSSs to minimize cost and improve customer service and are 8 essential to the development of forward looking non-recurring costs.

9

### 10 Q. HAS BELLSOUTH INCLUDED THE AVAILABILITY OF THIS

### 11 TECHNOLOGY IN DEVELOPING ITS PROPOSED PRICES FOR NRCs?

- A. No. BellSouth has not reflected the use of the latest technology in its cost studies
  for NRCs. As reflected in the rebuttal testimony of Thomas Hyde, BellSouth
  instead has relied upon studies on equipment placed into service before 1995.
  Thus, it is apparent that BellSouth's cost studies for NRCs do not reflect forwardlooking, least cost technology, and should be rejected.
- 17

# 18 Q. DOES THE AT&T/MCI NRCM REFLECT THE USE OF THE LATEST 19 AVAILABLE FORWARD-LOOKING LEAST COST TECHNOLOGY 20 DESCRIBED ABOVE?

- 21 A. Yes.
- 22

23 DISCUSS **Q**. PLEASE THE AT&T/MCI NON-RECURRING COST 24 MODEL'S (NRCM) ASSUMPTIONS FOR THE **TR-303 IDLC** 25 **CONCERNING SUB-LOOP UNBUNDLING.** 

The NRCM assumes that the DOP (what is this?) and NID are in place. After the 1 Α. CLEC purchases a Virtual Tributary DS1 (VT-1) on the ILEC OC-3 Fiber Feeder 2 from the Remote Terminal ("RT") to the CLEC collocation space, the installation 3 (and subsequent disconnection) of an unbundled loop would not require any 4 5 manual effort. The appearance of any new or migrated virtual DS0 customer loop 6 at the collocation area would be accomplished electronically using the appropriate OSSs and the functionality that is inherent in TR-303 IDLC systems. In other 7 8 words, if the ILEC has 24 DS0 channels/customers on its Virtual Tributary DS1 (VT-1) and terminated on its Local Digital Switch (LDS) and one (1) customer 9 decides to migrate to the CLEC, the ILEC would still retain the other 23 on their 10 VT1 and LDS. If the second customer (DS0) decides to migrate to the CLEC, the 11 ILEC would still retain the other 22 DS0s on its VT1 and LDS - and so on. It 12 should be noted that in the above scenario, it is assumed that both VT1s are 13 resident on the same ILEC Fiber Feeder (OC-3). Each OC-3 has the a total DS1 14 payload capacity – depending on electronics and configuration – of 84 VT1s. 15

16

# 17 Q. IS THIS THE SAME AS SUB-LOOP UNBUNDLING, ONLY IN A TR-303 18 IDLC ENVIRONMENT?

A. Absolutely not, because the CLEC in the above scenario is still using the same
ILEC OC-3 Loop fiber feeder, and is simply grooming from one Virtual DS1
tributary or channel (VT1) to another Virtual DS1 tributary or channel within the
same ILEC OC-3 fiber feeder. The DS0s are groomed via communications from
a provisioning/recent change OSS to the electronic time slot interchange (TSI) at
the remote terminal (RT). If the CLEC were to provide its own OC-3 or physical

1		DS1 from their POP to the RT or Feeder Distribution Interface (FDI), then it may
2		be considered as sub-loop Unbundling.
3		
4	Q.	WHAT ARE SOME OF THE ADVANTAGES OF THE AT&T/MCI NRC
5		MODEL?
6	A.	The NRCM provides a detailed step-by-step understanding of the systems
7		required and the manual work activities performed by an ILEC in the ordering and
8		provisioning of wholesale services and unbundled network elements.
9		
10		The NRCM models efficient, currently practiced processes using a TELRIC
11		network that supports wholesale services and unbundled network elements.
12		
13		The NRCM can be modified to reflect the removal or addition of work
14		steps/activities by updating the steps on the 'Processes & Calcs' spreadsheet of
15		the NRCM. The user determines the work/processes by selecting any of the 290
16		activities for each service type on the 'Processes & Calcs' spreadsheet.
17		
18		The NRCM allows for user inputs to adjust for specific regional conditions,
19		including the copper/fiber ratio of served loops and loops served by staffed vs.
20		non-staffed facilities. A proper cost study must account for these data.
21		
22		The NRCM identifies cost in the manner in which costs are incurred and
23		requested for installation, migration, and disconnect non-recurring activities.
24		
25		

# Q. DO YOU RECOMMEND ANY NRCS BASED ON ADJUSTMENTS TO BELLSOUTH'S NRC STUDIES TO THIS COMMISSION?

A Yes. Adhering to TSLRIC principles and based on necessary adjustments to
 BellSouth's NRC cost studies identified above and in the rebuttal testimony of
 Thomas Hyde, I recommended certain modifications that have been utilized by
 AT&T witness Wayne Ellison for purposes of AT&T's rate proposal in this
 docket.

8

#### 9 Q. WILL YOU PLEASE SUMMARIZE YOUR TESTIMONY?

10 Yes. In order for a competitive environment to exist, new entrants must have non-Α. discriminatory access to the incumbent's databases and other resources for 11 entering service orders to eliminate the need for costly, intermediate customer 12 service contacts. Also, new entrants must only incur costs equal to those which 13 the ILEC would incur using a forward looking network architecture and efficient 14 OSS or else the CLEC is burdened with a barrier to entry and the ILEC has no 15 incentive to become efficient. Finally, NRCs must be based upon TSLRIC 16 17 principles.

18

19 The NRCM recognizes those requirements. The NRCM, therefore, corrects the 20 many faulty assumptions that have been found in ILEC cost studies. The Non-21 Recurring Cost Model correctly adheres to the following:

- 22
- 23 (1) A forward looking cost model should incorporate the efficiencies of
  24 automated OSSs which provide for maximum electronic flow through of
  25 orders.

1 (2)To the extent fallout does indeed occur, it should be limited to approximately 2% of the total orders processed. 2 3 (3) Manual work times should reflect appropriate intervals based on the use of 4 forward looking network technologies. 5 (4) Wherever appropriate, service orders should be processed through a nondesigned POTS provisioning process as opposed to a more expensive 6 7 designed services process. (5) A forward looking cost model should incorporate the efficiencies of 8 9 automated Intelligent Network Elements (SONET, GR-303/IDLC, DCS/EDSX, LDS, etc.) which provide for maximum electronic flow 10 11 through for provisioning of orders. 12 (6) Wherever appropriate, the same work centers, work groups, technicians, 13 and associated labor rates should be modeled at parity with how BellSouth 14 provides similar services to itself. 15 (7) Migrations and installations should be recognized as mechanized 16 whenever DIP and DOP will permit. 17 (8) Installation and disconnection should be calculated separately to account for significant cost differences dependent on a new entrant's disconnect 18 19 decisions regarding DIP/DOP. 20 21 **DOES THIS CONCLUDE YOUR TESTIMONY?** Q. 22 23 Α. Yes. 24 25

Exhibit Docket Nos.: 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP John P. Lynott Rebuttal Exhibit JPL-1 Available Operational Support Systems Page 1 of 1

Work Center	BellSouth Reason for NRC <sup>1</sup>	Automated Systems not considered in development of Non-Recurring Cost								
WMC	WMC coordinates dispatched technicians	WFA/C - (Bellcore) The central operations system coordinating the installation and								
ļ	Any IMC or Network Svcs-Clerical time is	maintenance work and determining the dispatch system into which work orders flow. This								
	reflected in WMC time.	automated online system screens service orders according to type and complexity, routes orders								
		to the proper departments, monitors the work until completion, and verifies the quality of work								
ACAC	ACAC coordinates overall administration of svc	through final testing of the circuits.								
	order	WFA/DI-(Bellcore) A system that coordinates, tracks, prices and loads inside (central office								
	ACAC coordinates overall service turnup	installation, maintenance and routine work activity.								
		WFA/DO-(Bellcore) A system that coordinates, tracks, prices and loads outside installation,								
	ACAC includes incremental time for handling	maintenance and routine work activity.								
	various coordination issues (3.57 mininstall &	FORCE—(Bellcore) A system that assigns work taking into account the qualifications and								
	disconnect)	daily schedules of each technician, generates daily list of work to be done by the employees at								
		each location.								
AFIG	AFIG assigns facility	FACS—(Bellcore) Facility Assignment and Control Systems (SOAC, LFACS,								
0.000		SWITCH/COSMOS, TIRKS, PAWS). Automated systems to provide assignments of								
OSPE	OSPE reviews request, assigns FRN, & returns	inventory, to track and sequence service request, and to deliver work request to other down								
	svc inquiry to LCSC	stream systems.								
		FACS currently has the capability of flow-through assignment. A forward looking network								
		will include all available facilities. RMAs should be kept to a minimum (e.g., 2%)								
CPG	CPG processes svc request & generates DLR &	FACS/TIRKS(Bellcore) Facility Assignment and Control Systems (SOAC, LFACS,								
	word document to ALEC & field	SWITCH/COSMOS, TIRKS, PAWS) Automated systems to provide assignments of inventory,								
		to track and sequence service request, and to deliver work request to other down stream								
		systems.								
		TRIKS currently has the capability of flow-through assignment. A forward looking network								
		will include all available facilities. RMAs should be kept to a minimum (e.g., 2%)								

1

BellSouth Non-Recurring Cost Work Sheets, F2wadsl.xls, F2whdsl, F2wdistr.xls, F4whdsl, F4wdistr.xls.

Exhibit \_\_\_\_\_ Docket Nos: 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-2 BellSouth NRC Inputs Page 1 of 2

#### BELLSOUTH NONRECURRING COST STUDY INPUT 2 WIRE ADSL COMPATIBLE LOOP

#### ----ASSUMES MANUAL SERVICE ORDER ENTRY----

			LOCATION LI	FE (MOS.):	25		
STATE:	FL			(			
COST ELEMENT #:	A.6.1						
LEVEL:	1997 - 1999			(A)		(B)	
				ALL	DISCONNECT		
			WORKTIM	E\$ (HRS)	WORKTIN	ES (HRS)	
DESCRIPTION	SME	JFC	FIRST	ADDTL	FIRST	ADDTL	
SERVICE INQUIRY	<u></u>						
LCSC receives svc request & initiates manual svc inquiry to OSPE	Interconn Svcs	2300	0.0833	0.0833	0.0000	0.0000	
OSPE reviews request, assigns FRN, & returns svc inquiry to LCSC	Network	32XX	3.0000	3.0000	0.0000	0.0000	
SERVICE ORDER							
LCSC receives svc inquiry, responds to ALEC & issues svc order	Interconn Svcs	2300	0.5000	0.2500	0.3333	0.0000	
LCSC incremental work effort associated with no facilities available							
<ul> <li>LCSC responds to ALECservice order issued w/FID to bill special construction charges</li> </ul>	Interconn Svcs	2300	0.0125	0.0125	0.0000	0.0000	
WMC coordinates dispatched technicians	Network	4WXX	0.2500	0.0000	0.2500	0.0000	
ACAC coordinates overall administration of svc order	Network	471X	0.1833	0.1833	0.1833	0.1833	
SSIM processes svc request	Network	411X	0.3072	0.0000	0.3072	0.0000	
ENGINEERING							
AFIG assigns facilities	Network	400X	0.0167	0.0167	0.0000	0.0000	
CPG processes svc request & generates DLR & word document to ALEC & field	Network	470X	0.1300	0.1300	0.0007	0.0000	
CONNECT & TURN-UP TEST							
					0.0000	0.0000	
CO I&M Field work grp connects facility at collocation site ACAC coordinates overall service turnup	Network	431X	0.0583	0.0583	0.0333	0.0333	
	Network	471X	0.9595	0.9595	0.2395	0.2395	
SSIM makes x-conn @ x-box, tests circuit w/CO @ prem & x-box, tags circuit & completes order	Network	411X	2.6780	2.6780	0.5000	0.5000	
TRAVEL							
SSIM (incidental travel time which is not captured in NID/drop investment)	blat		0 2000	0.0000	0.2000	0.0000	
contraction and the which is not captured in ND/Grop investment)	Network	411X	0.3000	0.0000	0.3000	0.0000	

#### ASSUMPTIONS:

1) Assumes new loops--100% dispatch.

2) When the service inquiry determines no facilities are available, LCSC (service order) assumes 5% of time the ALEC requests facilities under special construction and that the disconnect time is included in the service order portion of the special construction charges.

3) ACAC connect includes incremental time for handling various coordination issues (3.57 min-install & disconnect)

4) CO I&M Field (connect & test) assumes 10% of total CO I&M Field time carried in other transport elements.

5) 2 Wire ADSL & 2 Wire HDSL work flow/times are same.

6) Any IMC or Network Svcs-Clerical time is reflected in WMC time.

7) incremental time associated with handling ALEC specified conversions is charged separately.

8) Loop will be ordered via manual service order entry.

#### Exhibit Docket Nos: 960833-TP/960846-TP/971140-TP/960757-TP/960916-TP Lynott Rebuttal Exhibit JPL-2 BellSouth NRC (inputs

Page 2 of 2

ADJUSTED NONRECURRING COST STUDY INPUT 2 WIRE ADSL COMPATIBLE LOOP	Page 2						
2 WIRE ADSE COMPATIBLE LOOP			LOCATION LI	FE (MOS.):	25		
STATE:	FL						
COST ELEMENT #:	A.6.1						
LEVEL:	1997 - 1999			(A)		(B)	
			INSTALL		DISCON	NECT	
			WORKTIM	IES (HRS)	WORKTIN	IES (HRS)	
DESCRIPTION	SME	JFC	FIRST	ADDTL	FIRST	ADOTL	Explanation
SERVICE INQUIRY							
LCSC receives svc request & initiates manual svc inquiry to OSPE	Interconn Svcs	2300	0.0000	0.0000	0.0000	0.0000	Not required.
OSPE reviews request, assigns FRN, & returns svc inquiry to LCSC	Network	32XX	0.0000	0.0000	0.0000	0.0000	Non-loaded loop, no need for review.
							OSS manages.
SERVICE ORDER							
LCSC receives svc inquiry, responds to ALEC & issues svc order	Interconn Svcs	2300	0.0108	0.0000	0.0000	0.0000	Allow 2% failout per order (first) only.
LCSC incremental work effort associated with no facilities available							
<ul> <li>LCSC responds to ALECservice order issued w/FID to bill special construction charges</li> </ul>	Interconn Svcs	2300	0.0000	0.0000	0.0000	0.0000	Special construction charges capture costs.
WMC coordinates dispatched technicians	Network	4WXX	0.0000	0.0000	0.0000	0.0000	WFA OSS manages technician dispatch.
ACAC coordinates overall administration of svc order	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS.
SSIM processes svc request	Network	411X	0.0000	0.0000	0.0000	0.0000	Not involved in service order.
ENGINEERING							
AFIG assigns facilities	Network	400X	0.0000	0.0000	0.0000	0.0000	Managed by OSS.
CPG processes svc request & generates DLR & word document to ALEC & field	Network	470X	0.0108	0.0100	0.0000	0.0000	Allow 2% failout.
CONNECT & TURN-UP TEST							
CO I&M Field work grp connects facility at collocation site	Network	431X	0.0000	0.0000	0.0000	0.0000	Recover in Cross-Connect element.
ACAC coordinates overall service turnup	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS.
SSIM makes x-conn @ x-box, lests circuit w/CO @ prem & x-box, tags circuit & completes order	Network	411X	0.1500	0.1083	0.1250	0.0833	Pull & Analyze+test+close+travel
TRAVEL							
SSIM (incidental travel time which is not captured in NID/drop investment)	Network	411X	0.0000	0.0000	0.0000	0.0000	No support. Should be recurring recovery.
AT&T/MCI ASSUMPTIONS:							
1) Probability of Order fallout:	2%	• •					
2) Fallout - Pull and Analyze order (copper):	2.5	minutes					
3) Fallout - Close order (copper):	1.5	minutes					
4) Fallout - Clear Jeopardy	30	minutes					
5) Travel/ 4 work orders	5	minutes					
6) Non-Staffed Lines	20%						
7) Cross-wire at Low Profile MDF	1	minutes					
8) Cross-wire at IDF	2	minutes					
9) Testing	1	minutes					

10) No fallout should occur when disconnecting a property inventoried network component.

11) 2 Wire ADSL & 2 Wire HDSL work flow/times are same.

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12) Loop will be ordered via electronic service order entry.

13) Travel to a collocation site and the cross connect work activity are recognized in BellSouth's 2-wire Cross Connect charge.

Additional adjustments are made to the cross connect NRC studies to insure proper recovery of the total costs to provision a loop to collocation space.

Exhibit Docket Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP

Lynott Rebuttal Exhibit JPL-3

Adjusted NRC Inputs

NONRECURRING COST STUDY INPUT Cross-Connect Provisioning with 2W / 4W NID		1	LOCATION LI	FE (MOS.):	25	2W/4W	, njusici 1970 -
STATE: COST ELEMENT #: LEVEL:	FL A.2.13 1997 - 1999			(A)		(B)	
DESCRIPTION	SME		INSTALL WORKTIMES (HRS) FIRST ADDTL		DISCON WORKTIM <u>FIRST</u>		
CONNECT & TURN-UP TEST 1&M makes 2W / 4W cross-connect for ALEC	Guilbeau	410X	0.0333	0.0333	0.0000	0.0000	Using AT&T assumptions.
<u>MATERIAL</u> Wire, clamps, wire ties, screws	Guilbeau		<b>\$</b> 0.318	<b>\$</b> 0.318	\$0.000	\$0.000	
AT&T/MCI ASSUMPTIONS: Terminate to NID	2 mii	nutes					

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#### Exhibit Docket Nos. 980833-TP/980846-TP/980757-TP/971140-TP/980916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Inputs

#### NONRECURRING COST STUDY INPUT 2 Wire/4 Wire NID to NID Installation

		LOCATION LIFE (MOS.):				2W/4W	
STATE: COST ELEMENT #: LEVEL:			(A) INSTALL WORKTIMES (HRS)		-		
DESCRIPTION	SME	<u>JFC</u>	FIRST	ADDTL	FIRST	ADDTL	
<u>SERVICE ORDER</u> LCSC receives ASR, issues service order & FOC I&M service order review / close-out	Scarbrough Guilbeau	2300 410X	0.0100 0.0000	0.0000 0.0000	0.0000 0.0000	0.0000 0.0000	Allow 2% failout per order (first) only Not involved in service order
CONNECT & TURN-UP TEST I&M installs/replaces BST 2W/4W NID for ALEC	Guilbeau	410X	0.0708	0.0708	0.0000	0.0000	Using AT&T assumptions.
TRAVEL SSIM (incidental travel time which is not captured in NID/drop loop investment)	Guilbeau	410X	0.5000	0.0000	0.0000	0.0000	Using AT&T assumptions.
MATERIAL 2W/4W NID (includes interface, bridge & protector)	Loop Study		\$23.723	\$23.723	\$0.000	\$0.000	Recurring Element
AT&T/MCI ASSUMPTIONS: Probability of Order fallout: Travel time to customer premise Setup and tear down Pull&Analyze, continuity test, close order Assumes electronic ordering	10 m	inutes inutes ilnutes	<u>NOTE: BST</u> A separate o				

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#### Exhibil \_\_\_\_\_\_ Docket Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Imputs

NONRECURRING COST STUDY INPUT 2 WIRE SUBLOOP (non-designed circuit)	ASSUMES MANUAL SERVICE ORDER ENTRY										
(Field Side Distribution Pair)		ι	OCATION LI	FE (MOS.):	25						
STATE: COST ELEMENT #: LEVEL:	FL A.2.2 1997 - 1999	A.2.2				( )					
	1997 - 1999			(A) FALL	DISCON	(B) INECT					
DESCRIPTION			WORKTIN		WORKTIN						
SERVICE INQUIRY	SME	JFC	FIRST	ADDTL	FIRST	ADDTL					
LCSC receives svc request & initiates manual service Inquiry to OSPE	Interconn Svcs	2300	0.0000	0.0000	0.0000	0.0000	Not required, using mechalnized electonic interface.				
OSPE reviews request, posts FRN on both subloop & tie pair between crossboxes, posts special rule at cust terminal to prevent FACS from posting the F1 facility, forwards rule to AFIG for FACS marking, & returns service inquiry to LCSC ****	<b>Networ</b> k	32XX	0.0000	0.0000	0.0000	0.0000	Not required, using mechainized electonic interface.				
LCSC receives service inquiry, issues non-design svc order w/approp details for using FRN & FOC	Interconn Svcs	2300	0.0100	0.0000	0.0000	0.0000	Allow 2% fallout per order (first) only				
WMC coordinates dispatched technicians	Network	4WXX	0.0000	0.0000	0.0000	0.0000	WFA OSS manages technician dispatch				
ACAC turns-up service to ALEC, coordinates overall administration of svc order	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS				
I&M processes svc request	Network	410X	0.0000	0.0000	0.0000	0.0000	Not involved with service order				
ENGINEERING											
AFIG assigns cable pairs according to FRN and rules	Network	400X	0.0040	0.0040	0.0000	0.0000	Allow 2% failout				
CPG design N/A	Network	470X	0.0000	0.0000	0.0000	0.0000	NA				
CONNECT & TURN-UP TEST											
ACAC dispatches appropriate work groups							0 r 1				
I&M makes x-conn @ x-box, tests circuit w/CO @ prem & x-box, tags circuit & completes order	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS				
terre realities a completes order	Network	410X	0.6042	0.1042	0.6000	0.1000	Pull & Analyze+test+close				
TRAVEL											
I&M (incidental Iravel time which is not captured in NID/drop investment)	Network	410X	0.0000	0.0000	0.0000	0.0000	No support. Should be recurring recovery.				
AT&T/MCI ASSUMPTIONS:											
Probability of Order fallout:											
Travel time to FDt	<u>2%</u>										
Setup and tear down		ninutes									
Cross connect (binding post)		ninutes ninutes									
Pull&Analyze continuity board along and a	2 1										

4 minutes

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Pull&Analyze, continuity test, close order

Assumes electronic ordering

#### Exhibit Docket Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Inputs

NONRECURRING COST STUDY INPUT 4 WIRE SUBLOOP (non-designed circuit)	ASSUMES MANUAL SERVICE ORDER ENTRY								
(Field Side Distribution Pair)		L	OCATION LIF	E (MOS.):	28				
STATE: COST ELEMENT #: LEVEL:	FL A.2.11 1997 - 1999			A)		B)			
DESCRIPTION SERVICE INQUIRY LCSC receives svc request & initiates manual service inquiry to OSPE OSPE reviews request, posts FRN on both subloop & tie pair between crossboxes, posts special rule at	SME Interconn Svcs Network	<u>JFC</u> 2300 32XX	INST WORKTIM <u>FIRST</u> 0.0000 0.0000		DISCON WORKTIM FIRST 0.0000 0.0000		Not required, using mechainized electonic interface. Not required, using mechainized electonic interface.		
cust terminal to prevent FACS from posting the F1 facility, forwards rule to AFIG for FACS marking, & returns service inquiry to LCSC ****									
SERVICE ORDER LCSC receives service inquiry, issues non-design svc order w/approp details for using FRN & FOC WMC coordinates dispatched technicians ACAC turns-up service to ALEC, coordinates overall administration of svc order I&M processes svc request	Interconn Svcs Network Network Network	2300 4WXX 471X 410X	0.0100 0.0000 0.0000 0.0000	0.0000 0.0000 0.0000 0.0000	0.0000 0.0000 0.0000 0.0000	0.0000 0.0000 0.0000 0.0000	Allow 2% fallout per order (first) only WFA OSS manages technician dispatch Coordination performed by OSS Not involved in service order		
ENGINEERING AFIG assigns cable pairs according to FRN and rules CPG design N/A	Network Network	400X 470X	0.0040 0.0000	0.0040 0.0000	0.0000 0.0000	0.0000 0.0000	Allow 2% fallout N/A		
CONNECT & TURN-UP TEST ACAC dispatches appropriate work groups I&M makes x-conn @ x-box, tests circuit w/CO @ prem & x-box, tags circuit & completes order	Network Network	471X 410X	0.0000 0.6958	0.0000 0.1958	0.0000 0.6750	0.0000 0.1750	Coordination performed by OSS Pull & Analyze+test+close + test at NID		
TRAVEL I&M (incidental travel time which is not captured in NID/drop investment)	Network	410X	0.2500	0.0000	0.0000	0.0000	NRCM recognizes 5 min travel + 5 min setup + 5 min tear down		
AT&T/MCI ASSUMPTIONS: Probability of Order failout: Travel time to FDI Setup and tear down Cross connect (binding post) Pull&Analyze, continuity test, close order 1000 hz test at NID Assumes electronic ordering	10 ( 4 ) 7 (	minutes minutes minutes minutes minutes							

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Exhibit \_\_\_\_

Dockel Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3

Adjusted NRC Inputs

					Cost	•	w/ one NR)		First	Ade	itional		
Cost					Element	instali	Disconnect	Install	Disconnect	instali	Disconnect		
State Element	#				Life	Time	Time	Time	Time	Time	Time	Nonrecuming	9
	<u> </u>		Source	JFC	(months)	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours	Additive	
FL H.2.6	Virtual Collocation - 2-Wire Cross Connects												
					25								
	Service Order	Customer Point of Contact	Interconnection Operations	2300				0.0000	0.0000	0.0000	0.0000	AT&T Assumpt Fallout	IONS
	Service Order	Circuit Provisioning Center	Advanced Networking Division	470X				0.0000	0.0000	0.0000	0.0000		2%
	Service Order	Work Management Center	Advanced Networking Division	4WXX				0.0000	0.0000	0.0000	0.0000	NonStaff Travel	
	Service Order	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		20
	Engineering	Circuit Provisioning Group	Advanced Networking Division	470X				0.0003	0.0000	0.0000	0.0000	Cross Connect	20
	Connect & Test	CO Install & Mice Field - Ckt & Fac	Advanced Networking Division	431X				0.1367	0.0333	0.1367	0.0333		2
	Connect & Test	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000	Copper %	•
				41.175				0.0000	0.0000	0.0000	0.0000		31%
FL H.2.7	Virtual Collocation - 4-Wire Cross Connects				28								
	Service Order	Customer Point of Contact	Interconnection Operations	2300	•••			0.0000	0.0000	0.0000	0.0000		
	Service Order	Circuit Provisioning Center	Advanced Networking Division	470X				0.0000	0.0000	0.0000	0.0000		
	Service Order	Work Management Center	Advanced Networking Division	4WXX				0.0000	0.0000	0.0000	0.0000		
	Service Order	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		
	Engineering	Circuit Provisioning Group	Advanced Networking Division	470X				0.0003	0.0000	0.0000	0.0000		
	Connect & Test	CO Install & Mtce Field - Cki & Fac	Advanced Networking Division	431X				0.1700	0.0667	0.1700	0.0667		
	Connect & Test	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		
				,,				0.0000	0.0000	0.0000	0.0000		
FL H.2.8	Virtual Collocation - DS1 Cross Connects				42								
	Service Order	Customer Point of Contact	Interconnection Operations	2300				0.0000	0.0000	0.0000	0.0000		
	Service Order	Network & Engineering Planning	Advanced Networking Division	31XX				0.0000	0.0000	0.0000	0.0000		
	Service Order	Circuit Provisioning Center	Advanced Networking Division	470X				0.0000	0.0000	0.0000	0.0000		
	Service Order	Network Plug-in Administration	Advanced Networking Division	341X				0.0000	0.0000	0.0000	0.0000		
	Service Order Service Order	Work Management Center	Advanced Networking Division	4WXX				0.0000	0.0000	0.0000	0.0000		
		Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		
	Engineering Connect & Yest	Circuit Provisioning Group	Advanced Networking Division	470X				0.0003	0.0000	0.0000	0.0000		
	Connect & Test	CO Install & Mice Field - Ckt & Fac	Advanced Networking Division	431X				0.1700	0.0667	0.1700	0.0667		
	Connect a rest	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		
FL H.2.9	Virtual Collocation - DS3 Cross Connects												
	Service Order	Contractor D. S. M. Construction			42								
	Service Order	Customer Point of Contact	Interconnection Operations	2300				0.0000	0.0000	0.0000	0.0000		
	Service Order	Network & Engineering Planning	Advanced Networking Division	31XX				0.0000	0.0000	0.0000	0.0000		
	Service Order	Circuit Provisioning Center	Advanced Networking Division	470X				0.0000	0.0000	0.0000	0.0000		
	Service Order	Work Management Center	Advanced Networking Division	4WXX				0.0000	0.0000	0.0000	0.0000		
	Engineering	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		
	Connect & Test	Circuit Provisioning Group	Advanced Networking Division	470X				0.0003	0.0000	0.0000	0.0000		
	Connect & Test	CO Install & Mtce Field - Ckt & Fac	Advanced Networking Division	431X				0.1700	0.0667	0,1700	0.0667		
	Connect a 1031	Access Customer Advocate Center	Advanced Networking Division	471X				0.0000	0000.0	0.0000.0	0.0000		

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# Exhibit \_\_\_\_\_ Docket Nos: 950633-TP/980846-TP/960757-TP/971140-TP/980916-TP Lynott Rebuttel Exhibit JPL-3

Adiu	sted	NRC	inouts

							C	( <b>F</b>			<b>F</b> <sup>1</sup> <b>A</b>		411 <b>1</b>		
									w/ one NR)		First		ditional		
		Cost							Disconnect	install	Disconnect		Disconnect		
Star	ie <u>Ek</u>	ement #	<u>+</u>		C	150	Life	Time	Time	Time	Time	Time	Time	Nonrecum	-
			-		Source	JFC	(months)	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours	Additive	
FL	1	H.1.9	Physical Collocation - 2-Wire Cross Connects				~								
							25							AT&T Assum	
			Service Order	Customer Point of Contact	Internet the Original									Fallout	
			Service Order	Circuit Provisioning Group	Interconnection Operations	2300				0.0000	0.0000	0.0000	0.0000		2%
			Service Order	Work Management Center	Advanced Networking Division					0.0000	0.0000	0.0000	0.0000	NonStaff Trave	
			Service Order	Access Customer Advocate Center	Advanced Networking Division					0.0000	0.0000	0.0000	0.0000		20
			Engineering							0.0000	0.0000	0.0000	0.0000	Cross Connec	3
			Connect & Test	Circuit Provisioning Group	Advanced Networking Division					0.0003	0.0000	0.0000	0.0000		2
			Connect & Test	CO Install & Mtce Field - Ckt & Fac						0.1367	0.0333	0.1367	0.0333	Copper %	
				Access Customer Advocate Center	r Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		31%
FL	н	1.10	Physical Collocation - 4-Wire Cross Connects				28								
			Service Order	Customer Point of Contact	Interconnection Operations	2300	20			0 0000	0.0000	0.0000	0.0000		
			Service Order	Circuit Provisioning Group	Advanced Networking Division					0.0000	0.0000		0.0000		
			Service Order	Work Management Center	Advanced Networking Division					0.0000	0.0000	0.0000	0.0000		
			Service Order	Access Customer Advocate Center								0.0000			
			Engineering	Circuit Provisioning Group	Advanced Networking Division	470X				0.0000	0.0000	0.0000	0.0000		
			Connect & Test	CO Install & Mice Field - Cht & Fac		431X				0.0003	0.0667	0.0000	0.0000		
			Connect & Test	Access Customer Advocate Center		471X				0.0000	0.0000	0.1700	0.00007		
_						4/1/				0.0000	0.0000	0.0000	0.0000		
FL	H.	1.11	Physical Collocation - DS1 Cross Connects				42								
			Service Order	Customer Point of Contact	Interconnection Operations	2300				0.0000	0.0000	0.0000	0.0000		
			Service Order	Network & Engineering Planning	Advanced Networking Division	31XX				0.0000	0.0000	0.0000	0.0000		
			Service Order	Circuit Provisioning Group	Advanced Networking Division	470X				0.0000	0.0000	0.0000	0.0000		
			Service Order	Network Plug-in Administration	Advanced Networking Division	341X				0.0000	0.0000	0.0000	0.0000		
			Service Order	Work Management Center	Advanced Networking Division	4WXX				0.0000	0.0000	0.0000	0.0000		
			Service Order	Access Customer Advocate Center		471X				0.0000	0.0000	0.0000	0.0000		
			Engineering	Circuit Provisioning Group	Advanced Networking Division	470X				0.0003	0.0000	0.0000	0.0000		
			Connect & Test	CO Install & Mice Field - Ckt & Fac		431X				0.1700	0.0667		0.0687		
			Connect & Test	Access Customer Advocate Center						0,1700	0.0007	0.1700			
_					HAVE DOD RECEIPTING DIRECTOR					0.0000	0.0000	0.0000	0.0000		
FL,	H.	f.12 F	Physical Collocation - DS3 Cross Connects				42								
			Service Order	Customer Point of Contact	Interconnection Operations	2300				0.0000	0.0000	0.0000	0.0000		
			Service Order	Network & Engineering Planning	Advanced Networking Division	31XX				0.0000	0.0000				
			Service Order	Circuit Provisioning Group	Advanced Networking Division	470X						0.0000	0.0000		
			Service Order	Work Management Center	Advanced Networking Division					0.0000	0.0000	0.0000	0.0000		
			Service Order	Access Customer Advocate Center		471X					0.0000	0.0000	0.0000		
			Engineering	Circuit Provisioning Group	Advanced Networking Division					0.0000	0.0000	0.0000	0.0000		
			Connect & Test	CO Install & Mice Field - Citt & Fac		470X				0.0003	0.0000	0.0000	0.0000		
			Connect & Test	Access Customer Advocate Center		431X				0.1700	0.0667	0.1700	0.0667		
					Advanced Networking Division	471X				0.0000	0.0000	0.0000	0.0000		

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Exhibit \_\_\_\_\_ Docket Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 INPUT SHEET Adjusted NRC Inputs

PAGE 1 of 1

#### DIRECTORY TRANSPORT FLORIDA

#### SUMMARY OF INPUTS

		Job Function					
Line	Description	Codes (JFCs)	Function	Source	First Amount	Addl Amount	
1.	Installation per Trunk or Signaling Connection (Hours):						
2.	Switch & Trunk Based Translations	4N2X	Engineering	Network Services	1.50	0.05	AT&T 5ESS TOC Study
З.	Trunk & Carrier Group (TCG)	4N5X	Engineering	Network Services	0.10	0.05	
4.	CO Install & MTCE Field - Switch Equipment	430X	Connect & Test	Network Services	0.23	0.16	See NRC Model
5.							
6.	Disconnect per Trunk or Signaling Connection (Hours):						
7.	Switch & Trunk Based Translations	4N2X	Engineering	Network Services	1.50	0.05	AT&T 5ESS TOC Study
8.	Trunk & Carrier Group (TCG)	4N5X	Engineering	Network Services	0.05	0.05	
<b>9</b> .	CO Install & MTCE Field - Switch Equipment	430X	Connect & Test	Network Services	0.00	0.00	Managed bby OSS
10.							
11.	Cost Element Life in Months			Study Assumption	42		
	AT&T/MCI ASSUMPTION:						
	Validate	0.50	hours				
	Assign Equip	0.25	hours				
	Recent Change	0.25	hours				
	In-effect	0.25	hours				
	Complete	0.25	hours				
	Total Provisioning	1.50	hours				
	-						

Assumes electronic ordering

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#### Exhibit Docket Nos 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Inputs

					First	First	Additional	Additional	
			Labor Expense Description	JFC/	Installation Time	Disconnect Time	Installation Time	Disconnect Time	
	Source	Work Group	(Limited to 25 characters)	Payband		Hours	(Hours)	Hours	
1	Network	CUSTOMER POINT OF CONTACT (ICSC)	Service Order	2300	0.0100	0.0000	0.0000	0.0000	Allow 2% failout per order (first) only.
2	Network	CO INSTALL & MTCE CKT & FAC (NTEL)	Service Order	431X	0.0000	0.0000	0.0000	0.0000	Not required.
3	Network	CIRCUIT PROVISIONING GROUP (CPG)	Service Order	470X	0000.0	0.0000	0.0000	0.0000	Not required.
4	Network	ACCESS CUSTOMER ADVOCATE CENTER (ACAC)	Service Order	471X	0.0000	0.0000	0.0000	0.0000	Not required.
5	Network	INSTALLATION & MTCE CENTER (IMC)	Service Order	401X	0,0000	0.0000	0.0000	0.0000	Not required.
6	Network	NETWORK PLANNING & ENGINEERING (PICS)	Engineering	341X	0.0000	0.0000	0.0000	0.0000	Not required, EF&I of recurring captures.
7	Network	NETWORK & ENGINEERING PLANNING (FG20)	Engineering	31XX	0.0000	0.0000	0.0000	0.0000	No cost support.
Å	Network	CIRCUIT PROVISIONING GROUP (CPG)	Connect & Test	470X	0.0058	0.0000	0.0058	0.0000	NRCM accounts only for failout
9	Network	ACCESS CUSTOMER ADVOCATE CENTER (ACAC)	Connect & Test	471X	0.0000	0.0000	0.0000	0.0000	Not required.
10	Network	CO INSTALL & MTCE CKT & FAC (NTEL)	Connect & Test	431X	0.2292	0.1875	0.0000	0.0000	Using AT&T assumptions
11	HOLMOIR	OO INSTALL BINITCE OKT & FAC (NTEL)	Connect a Test	4317	0.2292	0.1675	0.0000	0.0000	O BING A LET Sasoniptions
12									
13									
14									
15	Network	Cost element Life (Months) =		2					
16	NOIN	Cost element File (Month's) =	4	2					
17									
	&T/MCI ASSUI	ALCONO.							
	bability of Orde								
			2%						
		ying capacity, not dedicated (similar to BellSouth provisionir		- <b>.</b> .					
		invity test, analyze monitoring data, intrusive test, close ord unts only for fallout	e 13.7	5 minutes					
	& Analyze		2	5 minutes					
Cle	ar jeopardy			5 minutes					
		, using Flexcom to perform own disc.			Maximum of 25		t Element #		
Assumes electronic ordering					WHEAT HUT UT 25	ennige her Cor	3L E, OUT 101 11 19		
		· · · · · · · · · · · · · · · · · · ·							

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Exhibit\_ Docket Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Inputs

	INPUTS DS1 LOCAL CHANNEL									STATE: FLORIDA DATE: OCTOBER 1997
34										
35		NONR	=CU		<b>TALL</b>		DICCON	NECT		
36			.,				DISCON			
37		JFC		WORKTI	MES (HI	•	ORKTIME	• •	SOURCE	
38		PAYB	ND	FIRST		ADDTL	FIRST	ADDTL	SOURCE	
- 39	SERVICE ORDER									
40	CUST PT OF CONT (ICSC)	2300		0.0100		0.0000	0.0000		NETWORK	Allow 2% fallout per order (first) only
41	CO INSTALL & MTCE FIELD	431X		0.0000		0.0000	0.0000		NETWORK	Not required
42	ACC CUST ADV CTR (ACAC)	471X		0.0000		0.0000	0.0000		NETWORK	Not required
43	CKT PROV GRP (CPG)	470X		0.0000		0.0000	0.0000		NETWORK	Not required
- 44	WORK MGT CTR (WMC)	4WXX		0.0000		0.0000	0.0000	0.0000	NETWORK	Not required
45	INST & MTCE-SP SVC (SSIM)	411X		0.0000		0.0000	0.0000	0.0000	NETWORK	Not required
46										
47	ENGINEERING									
48	OSP ENG (FG30)	32XX		0.0000		0.0000	0.0000	0.0000	NETWORK	All engineering grouped in CPG.
49	CKT PROV GRP (CPG)	470X		0.0108		0.0100	0.0000	0.0000	NETWORK	NRCM accounts only for failout.
50	ADD & FAC INVENT (AFIG)	400X		0.0000		0.0000	0.0000	0.0000	NETWORK	All engineering grouped in CPG.
51	NTWK PLUG-IN ADMIN (PICS)	341X		0.0000		0.0000	0.0000	0.0000	NETWORK	All engineering grouped in CPG.
52										
53	CONNECT & TEST									
	CO INSTALL & MTCE FIELD	431X		0.4867		0.4450	0.4867	0.4450	NETWORK	Using AT&T assumptions.
	INST & MTCE-SP SVC (SSIM)	411X		0.0833		0.0417	0.0833	0.0417	NETWORK	Using AT&Tassumptions.
	ACC CUST ADV CTR (ACAC)	471X		0.0000		0.0000	0.0000	0.0000	NETWORK	Not required
57	, ,									,
	TRAVEL									
	INST & MTCE-SP SVC (SSIM)	411X		0.0000		0.0000	0.0000	0.0000	NETWORK	No cost support
60										
61										
	COST ELEMENT LIFE IN MONTHS		42							
			42							
63										
64										
	AT&T/MCI ASSUMPTIONS:									
	Assumes electronic ordering									
	Probability of Order fallout:			2%						
	Travel time to non-staff C.O./ 4 work activities			minutes						
	Travel time within staff C.O./ 4 work activities		5	minutes						
	Non-staff Lines	20	6							
	Setup and tear down/ 4 work activities		3	minutes						
	Pull & Analyze an close order		4	minutes	SSC					
	Pull & Analyze an close order		- 4	minutes	FMAC					
	Cross connect		30	minutes	at prote	ector frame	, Toll Dis	tribution	Frame and DSX bi	ly
	Copper %	<u>31</u>	6							
	QRSS test via remote ITS		5	minutes	FMAC					
	loop back test		1	minutes	SSC					
	Negotiate customer release on Disc		20	minutes						
	CPG - NRCM accounts only for fallout									
	Pull & Analyze		2.5	minutes						
	Clear jeopardy			minutes						
	, , , , , , , , , , , , , , , , , , ,									

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Exhibit \_\_

Docket Nos. 960833-TP/960846-TP/960757-TP/971140-TP/960916-TP

Lynott Rebuttal Exhibit JPL-3

Adjusted NRC Inputs

Port Type: 4-Wire Analog Port									
	Cost Element: B.1.2								
30									
31	Nonrecurring (Labor) inputs								
32	Worktimes (Hours) by JFC		Network		į				
33	First Port	Function	Job Function Code	Install	Disconnect				
34	Customer Point of Contact	Service Order	2300	0.0100	0.0000	Allow 2% fallout per order (first) only			
35	Network Services Clerical	Connect & Test	2730	0.0032	0.0032	Time times Copper %			
36	Recent Chng Line Trans	Connect & Test	4N1X	0.0078	0.0039	Time times Copper %			
37	CO Inst & Maint - Ckt & Fac	Connect & Test	431X	0.0000	0.0000	Recover in Cross-Connect element			
38	Acc Customer Advocate Cntr	Connect & Test	4AXX	0.0000	0.0000	Coordination performed by OSS			
39	·				ļ				
40	Additional Ports				ŀ				
41	Customer Point of Contact	Service Order	2300	0.0000	0.0000				
42	Network Services Clerical	Connect & Test	2730	0.0032	0.0032				
43	Recent Chng Line Trans	Connect & Test	4N1X	0.0078	0.0039				
- 44	CO Inst & Maint - Ckt & Fac	Connect & Test	431X	0.0000	0.0000				
45	Acc Customer Advocate Cntr	Connect & Test	4AXX	0.0000	0.0000				
46									
47	Location Life (Months)		CRIS Records	56					
48									
49	AT&T/MCI ASSUMPTIONS:								
50	Probability of Order fallout:	<u>2%</u>							
51	% Copper	31%	from Hatfield						
52	Assumes electronic ordering								
53			1						

State: FL Workpaper: Inputs

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Exhibit Docket Nos. 960833-TP/960848-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Inputs

Workpaper: 11 State: FL

		Cost		JFC/	installation Time	Disconnect Time	First Installation Time	First Disconnect Time	Additional Installation Time	Additional Disconnect Time
<b></b>	Cost	Element Life (Mo)	Labor Expense Description	Payband	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours
	Element #		Connect and Test	4321	0.005833	0.005633				
	2.1		Service Order	2300	0	0				
FL B	2.2		Connect and Test	4321 2300	0.005833	0.005633 0				
	3.2.2		Service Order Connect and Test	4321	0.005833	0.005633				
	1.2.3		Service Order	2300	0	0				
-	12.4		Connect and Test	4321	0.005833	0.005633				
	3.2.4		Service Order	2300	0	0.005633				
	3.2.5		Connect and Test Service Order	4321 2300	0.005833	0.000033				
	3.2.5		Connect and Test	4321	0.005833	0.005633				
	3.2.6 3.2.6		Service Order	2300	٥	0				
	3.2.7	28	Connect and Test	4321	0.005833	0.005833				
	3.2.7		Service Order	2300	0	0.0056223				
ค. 8	3.2.8		Connect and Test	4321	0.005833	0.005633				
FL B	3.2.8		Service Order	2300 4321	0.005833	0.005633				
	3.2.9		Connect and Test	2300	0.000000	0				
	3.2.9		Service Order Connect and Test	4321	0.005633	0.005633				
	B.2.10		Service Order	2300	0	0				
	B.2.10 B.2.11		Connect and Test	4321	0.005833					
	B.2.11		Service Order	2300	0	0				
	B.2.12	28	Connect and Test	4321	0.005833	0.005633				
	B.2.12		Service Order	2300 4321	0.005833					
FL B	B.2.13		Connect and Test	2300	0.003633	0.0000000				
-	B.2.13		Service Order	4321	0.005833	0.005633				
	B.2.15		Connect and Test Service Order	2300	0					
	B.2.15		Connect and Test	4321	0.005833	0.005633				
	B.2.16 B.2.16		Service Order	2300	0	0				
	8.2.17		Connect and Test	4321	0.005833	-				
	B.2.17	28	Service Order	2300						
	8.2.18		3 Connect and Test	4321 2300						
	B.2.18		Service Order	4321						
	B.2.19		B Connect and Test	2300	_					
R.	B.2.19		3 Service Order	4321		3 0.005633	3			
·	B.2.20		8 Connect and Test 8 Service Order	2300		) (				
. =	B.2.20		B Connect and Test	4321	0.00583					
	B.2.21		8 Service Order	2300		) (				
	B.2.21 B.2.22		8 Connect and Test	4321		3 0.00563 0 (				
	8.2.22		8 Service Order	2300 4321			-			
	B.2.23		8 Connect and Test	2300	-		5			
R.	B.2.23		8 Service Order	230		3 0.00563	3			
FL	B.2.24		8 Service Order 8 Connect and Test	432		•	0			
R.	B.2.24		0 Service Order	230						
fl.	B.2.25		0 Connect and Test	432		•	0			
FL FL	B.2.25 B.2.26		0 Service Order	230			0			
R.	B.2.26		60 Connect and Test	432 230		•	-			
FL.	B.2.27	e	0 Service Order	432	•		0			
FL.	B.2.27		30 Connect and Test	230			3			
FL	B.2.28		28 Service Order 28 Connect and Test	432		33 0.00563				
FL.	8.2.28		28 Connect and Test	432	0.0058					
A.	8.2.28 B.2.29		28 Service Order	230		0 0.0056	0			
Я.	B.2.29		28 Connect and Test	432		33 0.00563 0	so 0			
FL	B.2.30		28 Service Order	230						
FL	B.2.30		28 Connect and Test	432 230			0			
FL	B.2.31		28 Service Order	432		33 0.0056	33			
FL	B.2.31		28 Connect and Test 28 Connect and Test	43		33 0.0056				
FL _	B.2.32		28 Service Order	23		0	0			
FL.	8.2.32 8.2.33		28 Connect and Test	43			33			
FL FL	B.2.33		28 Service Order	23		0 133 0.0056	-			
FL	B.2.34		28 Connect and Test	43 23		0 0.0050	0			
FL	B.2.34		28 Service Order		00	ŏ	0			
FL.	B.2.35		28 Service Order		21 0.005	833 0.0056	333			
FL	B.2.35		28 Connect and Test 60 Service Order		00	0	0			
FL	B.2.36		60 Connect and Test		21 0.005	833 0.0056				
FL.					300	0	0			
FL.	B.2.36		28 Service Order				200			
	B.2.36 B.2.37		28 Service Order 28 Connect and Test	43	321 0.005	833 0.005		0833 0.1	0500 0.	0167 0.0000
FL FL	B.2.36			43		833 0.005		0833 0,1	<b>0500 0</b> .	0167 0.0000

NRCM accounts only for fallout Probability of fallout: Pull & Analyze Clear jeopardy Assumes electronic ordering

Unbundled Local Exchange Port Features Nonrecurring Labor Time Inputs (WP11 worksheet)

2% 2.5 minutes 15 minutes

#### Exhibit \_\_\_\_\_\_ Docket Nos. 960833-TP/ 960846-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC inputs

NONRECURRING COST STUDY INPUT 2 WIRE HDSL COMPATIBLE LOOP	ASSUMES I	ANUAL SERV	/ICE ORDER E	NTRY-			•
			LOCATION LI	FE (MOS.):	25		
STATE:	FL						
COST ELEMENT #:	A.7.1						
LEVEL:	1997 - 1999			(A)		(B)	
			INST		DISCON		
			WORKTIM	ES (HRS)	WORKTIN	IES (HRS)	
DESCRIPTION	SME	JFC	FIRST	ADDTL	FIRST	ADDTL	
SERVICE INQUIRY							
LCSC receives svc request & initiates manual svc inquiry to OSPE	Interconn Svcs	2300	0.0000	0.0000	0.0000	0.0000	Not required.
OSPE reviews request, assigns FRN, & returns svc inquiry to LCSC	Network	32XX	0.0000	0.0000	0.0000	0.0000	Non-loaded loop, no need for review.
							OSS manages.
SERVICE ORDER							
LCSC receives svc inquiry, responds to ALEC & issues svc order	Interconn Svcs	2300	0.0108	0.0000	0.0000	0.0000	Allow 2% failout per order (first) only
LCSC incremental work effort associated with no facilities available							
<ul> <li>LCSC responds to ALEC—service order issued w/FID to bill special construction charges</li> </ul>	Interconn Svca	2300	0.0000	0.0000	0.0000	0.0000	Special construction charges capture costs.
WMC coordinates dispatched technicians	Network	4WXX	0.0000	0.0000	0.0000	0.0000	WFA OSS manages technician dispatch
ACAC coordinates overall administration of svc order	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS
SSIM processes svc request	Network	411X	0.0000	0.0000	0.0000	0.0000	Not involved in service order
CHONCEDING.							
	Network	4007	0 0000	0.0000	0.0000	0.0000	Managad by OSS
AFIG assigns facilities	Network	400X 470X	0.0000 0.0108	0.0100	0.0000	0.0000	Managed by OSS. Allow 2% failout
CPG processes avc request & generates DLR & word document to ALEC & field	NUWORK	4/04	0.0108	0.0100	0.0000	0.0000	AROW 276 TAROUT
CONNECT & TURN-UP TEST							
CO I&M Field work grp connects facility at collocation site	Network	431X	0.0000	0.0000	0.0000	0.0000	Recover in Cross-Connect element
ACAC coordinates overall service turnup	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS
SSIM makes x-conn @ x-box, tests circuit w/CO @ prem & x-box, tags circuit & completes order	Network	411X	0.1500	0.1083	0.1250	0.0833	Pull & Analyze+test+close+travel
TRAVEL							
SSIM (incidental travel time which is not captured in NID/drop investment)	Network	411X	0.0000	0.0000	0.0000	0.0000	No support. Should be recurring recovery.
AT&T/MCI ASSUMPTIONS:							
Probability of Order fallout:	<u>2%</u>						
Fallout - Pull and Analyze order (copper):	2.5	minutes					
Fallout - Close order (copper):	1.5	minutes					
Fallout - Clear Jeopardy	30	minutes					
Travel/ 4 work orders	5	minutes					
Non-Staffed Lines	20%						
Cross-wire at Low Profile MDF	1	minutes					
Cross-wire at IDF	2	minutes					
Testing	1	minutes					
Assumes electronic ordering							

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Exhibit Docket Nos. 960833-TP/960646-TP/960757-TP/971140-TP/960916-TP Lynott Rebuttal Exhibit JPL-3 Adjusted NRC Inputs

		1	LOCATION LI	FE (MOS.):	28		
STATE:	FL						
COST ELEMENT #:	A.8.1						
LEVEL:	1997 - 1999			(A)		(8)	
				TALL	DISCO		
				IES (HRS)		AES (HRS)	
DESCRIPTION	SME	JFC	FIRST	ADDTL	FIRST	ADDTL	
SERVICE INQUIRY	<u></u>	<u></u>	<u></u>	<u></u>			
LCSC receives svc request & initiates manual svc inquiry to OSPE	interconn Syca	2300	0.0000	0.0000	0.0000	0.0000	Not required.
OSPE reviews request, assigns FRN, & returns svc inquiry to LCSC	Network	32XX	0.0000	0.0000	0.0000	0.0000	Non-loaded loop, no need for review.
COPE Taviaws request, assigns Free, a terring see inquery to ECOC	HOWOR	32.1.1	0.0000	0.0000	0.0000	0.0000	
SERVICE ORDER							OSS manages.
	h.h						
LCSC receives svc inquiry, responds to ALEC & issues svc order LCSC incremental work effort associated with no facilities available	Interconn Svcs	2300	0.0108	0.0000	0.0000	0.0000	Allow 2% fallout per order (first) only
							<b>•</b> • • • • • • • • •
LCSC responds to ALEC-service order issued w/FID to bill special construction charges	Interconn Svca		0.0000	0.0000	0.0000	0.0000	Special construction charges capture costs.
WMC coordinates dispatched technicians	Network	4WXX	0.0000	0.0000	0.0000	0.0000	WFA OSS manages technician dispatch
ACAC coordinates overall administration of svc order	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS
SSIM processes svc request	Network	411X	0.0000	0.0000	0.0000	0.0000	Not involved in service order
ENGINEERING							
AFIG assigns facilities	Network	400X	0.0000	0.0000	0000.0	0.0000	Managed by OSS.
CPG processes svc request & generates DLR & word document to ALEC & field	Network	470X	0.0108	0.0100	0.0000	0.0000	Allow 2% failout
CONNECT & TURN-UP TEST							
CO I&M Field work grp connects facility at collocation site	Network	431X	0.0000	0.0000	0.0000	0.0000	Recover in Cross-Connect element
ACAC coordinates overall service tumup	Network	471X	0.0000	0.0000	0.0000	0.0000	Coordination performed by OSS
SSIM makes x-conn @ x-box, tests circuit w/CO @ prem & x-box, tags circuit & completes order	Network	411X	0.4167	0.2917	0.1750	0.1333	Pull & Analyze+lest+close+travel
TRAVEL							
SSIM (incidental travel time which is not captured in NID/drop investment)	Network	411X	0.0000	0.0000	0.0000	0.0000	No support. Should be recurring recovery.
AT&T/MCI ASSUMPTIONS:							
Probability of Order fallout:	24/						
Fallout - Pull and Analyze order (copper):	2% 2.5	minutes					
Fallout - Close order (copper):	2.5	minutes					
Fallout - Clear Jeopardy Travel/ 4 work orders	30	minutes					
	5	minutes					
Non-Staffed Lines	20%						
Puil and Analyze order (SSC&FMAC):	5	minutes					

-ASSUMES MANUAL SERVICE ORDER ENTRY----

NONRECURRING COST STUDY INPUT

**4 WIRE HDSL COMPATIBLE LOOP** 

#### AT&T/MCI ASS

Probability of Order fallout:	2%
Fallout - Pull and Analyze order (copper):	2.5
Fallout - Close order (copper):	1.5
Fallout - Clear Jeopardy	30
Travel/ 4 work orders	5
Non-Staffed Lines	20%
Puil and Analyze order (SSC&FMAC):	5
Close order (SSC&FMAC):	3
Cross-wire at Low Profile MDF	2
Cross-wire at IDF	4
Testing	6
Assumes electronic ordering	

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minutes minutes minutes minutes