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February 12, 1998

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Resolution of Petition to Establish
Non Discriminatory Rates, Terms, and Conditions
for Resale Involving Local Exchange Companies
and Alternative Local Exchange Companies
pursuant to Section 364.161, Florida Status
Docket No. 961230-TP

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and 15 copies of the pre filed direct testimony of Randy G. Farrar, Kent W. Dickerson, & John D. Quackenbush also, the original non-confidential portion of Sprint-Florida, Inc.'s cost studies. The confidential portion of the cost studies was filed on this date with the Division of Records and Reporting under a separate confidential cover.

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Charles J. Rehwinkel
Charles J. Rehwinkel

Enclosures

cc: All parties of record (w/o encl.)

Dickerson
DOCUMENT NUMBER-DATE
02164 FEB 12 88
FPSC-RECORDS/REPORTING

Farrar
DOCUMENT NUMBER-DATE
02160 FEB 12 88
FPSC-RECORDS/REPORTING

Quackenbush
DOCUMENT NUMBER-DATE
02165 FEB 12 88
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 961230-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Hand Delivery (*) or U.S. Mail this 12th day of February, 1998 to the following:

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904/847-0244

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2 DIRECT TESTIMONY
3 OF
4 RANDY G. FARRAR
5

6 I. Introduction
7

8 Q. Please state your name, occupation, and business address.

9 A. My name is Randy G. Farrar. I am presently employed as
10 Senior Manager - Network Costing for Sprint/United
11 Management Company. My business address is 2330 Shawnee
12 Mission Parkway, Westwood, Kansas, 66205.

13
14 Q. What is your educational background?

15 A. I received a Bachelor of Arts degree from The Ohio State
16 University, Columbus, Ohio, in June 1976 with a major in
17 history. Simultaneously, I completed a major program in
18 economics. Subsequently, I received a Master of Business
19 Administration degree, with an emphasis on market
20 research, in March 1978, also from The Ohio State
21 University.

22
23 Q. What is your work experience?

24 A. From 1978 to 1983 I was employed by the Public Utilities
25 Commission of Ohio. My positions were Financial Analyst

1 (1978 - 1980) and Senior Financial Analyst (1980-1983).
2 My duties included the preparation of Staff Reports of
3 Investigation concerning rate of return and cost of
4 capital. I also designed rate structures, evaluated
5 construction works in progress, measured productivity,
6 evaluated treatment of canceled plant, and performed
7 financial analyses, for electric, gas, telephone, and
8 water utilities. I presented written and oral testimony
9 on behalf of the Commission Staff in over twenty rate
10 cases.

11
12 I have worked for Sprint Corporation or one of its
13 predecessor companies since 1983. From 1983 to 1986 I
14 was Manager - Rate of Return. I presented written and
15 oral testimony before state public utilities commissions
16 in Iowa, Nebraska, South Carolina, and Oregon.

17
18 From 1986 to 1987 I was Manager - Local Exchange Pricing.
19 I investigated alternate forms of pricing and rate
20 design, including usage sensitive rates, extended area
21 service alternatives, intraLATA toll pricing, and
22 lifeline rates.

23
24 Since 1987, I have held various positions dealing with
25 telecommunications cost issues. From 1987 to 1992 I was

1 Manager - Local Exchange Costing. In 1992 I was promoted
2 to Manager - Network Costing and Pricing. In 1997 I was
3 promoted to my present position. I perform financial
4 analyses for various business cases, which analyze the
5 profitability of entering new markets and expanding
6 existing markets, including Custom Calling, Centrex,
7 CLASS and Advanced Intelligent Network features, CPE
8 products, Public Telephone and COCOT, and intraLATA toll.
9 I am an instructor for numerous training sessions for
10 subsidiary companies, designed to support corporate
11 policy on pricing and costing theory, and to educate and
12 support the use of various costing models. I was a
13 member of the United States Telephone Association's New
14 Services and Technologies Issues Subcommittee from 1989
15 to 1992, and the Economic Analysis Training Work Group
16 from 1994 to 1995. Since 1995, I have presented written
17 and/or oral testimony before the Illinois Commerce
18 Commission, the Pennsylvania Public Utility Commission,
19 the New Jersey Board of Public Utilities, the Florida
20 Public Service Commission, and the Nevada Public Service
21 Commission on the avoided costs of resold services, the
22 cost of unbundled network elements, access reform, and
23 universal service issues.

24

25 Q. What is the purpose of your testimony?

1 A. I am testifying on behalf of Sprint - Florida, Inc.,
2 hereafter referred to as Sprint. My testimony will
3 discuss Total Service Long Run Incremental Cost (TSLRIC)
4 concepts for the following unbundled network elements.

- 5
- 6 1. Local Switching
- 7 2. Tandem Switching
- 8 3. Transport
- 9 4. SS7 Switching
- 10 5. Operator / Directory Assistance / Call Related
11 Database Services

12

13 Q. Is Sprint's perspective on pricing and costing unique?

14 A. Yes, it is. Sprint's perspective on the pricing and
15 costing of unbundled network elements is neither solely
16 one of a local telephone company, nor solely one of an
17 interexchange carrier. Rather, Sprint's perspective
18 represents an accommodation of interests similar to those
19 that the Florida Public Service Commission must balance
20 in this docket. Sprint provides traditional local
21 exchange service, long distance service, and PCS/wireless
22 communication. In addition, Sprint Communications
23 Company, L.P. will compete as a competitive local
24 exchange carrier (CLEC).

25

1 II. LOCAL SWITCHING

2

3 Q. What does the FCC Order state about the rates for
4 unbundled local switching?

5

6 A. The FCC Order states,

7 We believe that a combination of a flat-rated
8 charge for line ports, which are dedicated to
9 a single new entrant, and either a flat-rate
10 or per-minute usage charge for the switching
11 matrix and for trunk ports, which constitute
12 shared facilities, best reflects the way costs
13 for unbundled switching are incurred and is
14 therefore reasonable. (Paragraph 810).

15

16 Q. How does Sprint propose to price unbundled switching?

17 A. Sprint agrees with the basic logic of the FCC. Local
18 switching shall be priced as three separate components;
19 a flat-rated port, usage sensitive switching, and flat-
20 rated features.

21

22 **A. Local Switching (Usage)**

23

24 Q. Please describe the local switching TSLRIC methodology.

25 A. The TSLRIC methodology for local switching consists of an

1 Excel worksheet model, SWIM (Switching Model). SWIM
2 takes total investment derived from the Bellcore SCIS
3 (Switching Cost Information System) model, and combines
4 it with actual usage information to derive TSLRIC results
5 for each host office complex.

6

7 Q. Please describe the SCIS model.

8 A. The SCIS model is a widely used industry model for
9 determining switching investment. Arthur Andersen
10 conducted a review of SCIS on behalf of the FCC in 1993.
11 Their report concluded,

12 After conducting an extensive review, Arthur
13 Andersen has concluded that the SCIS model is
14 fundamentally sound and provides reasonable
15 estimates of the switching system investment
16 attributable to service and feature usage of
17 the switch.

18

19 Q. Have any external adjustments been made to the SCIS
20 information?

21 A. Yes. Nortel provides Sprint two different discounts on
22 switching equipment, a "growth" discount on existing
23 switches, and a "new" discount for entirely new switches.
24 (The actual level of discounts is proprietary to Nortel.)
25 Sprint has traditionally used the lower "growth" discount

1 in its SCIS modeling. Since a TSLRIC standard must be as
2 forward-looking as possible, Sprint has modified its SCIS
3 information to reflect the larger "new" discount. The
4 result is significantly lower investment, and lower
5 switching costs.

6

7 Q. Please describe the SWIM model.

8 A. The SWIM TSLRIC methodology for switching consists of six
9 basic steps. The calculations for one particular switch,
10 West Kissimmee, Florida, titled "Local Switching
11 Calculations", can be found in the Pricing and Costing
12 Studies, Section E, Local Switching / Features. This
13 process is repeated for each switch studied.

14

15 The first step is to determine the total forward-looking
16 switching investment using the SCIS model. Individual
17 Nortel DMS-100/200 switches in Florida were modeled,
18 assuming a minimum Supernode-60 processor capability.
19 Supernode-60 is the minimum processor size currently
20 supported by Nortel. Although earlier vintage processors
21 may be currently in use, they represent obsolete
22 technology and do not represent forward-looking
23 technology as required by TSLRIC standards. The DMS-
24 100/200 switch represents the predominant technology
25 deployed by Sprint in Florida.

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This investment is segregated into six investment categories. These are,

[REDACTED]

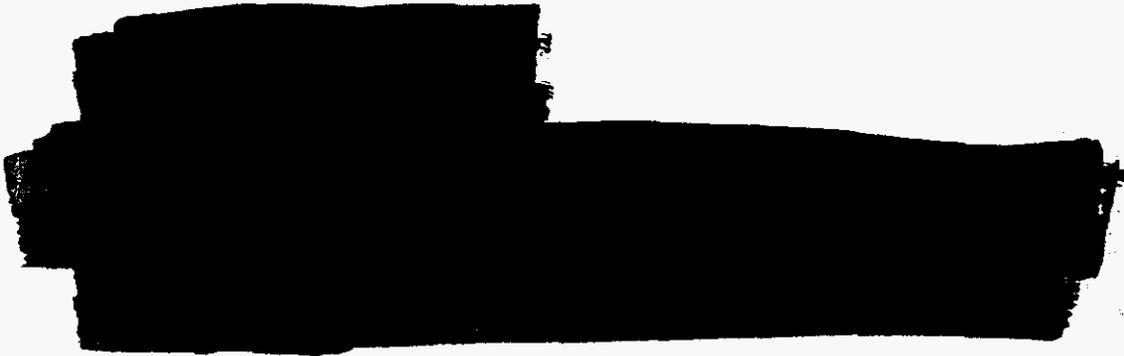
[REDACTED]

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This investment information is summarized on Page 1 of "Common Switching Calculations."

The SCIS model considers only the hardware investment in the central office. One-time software investment required to provide basic switching must also be included. This proprietary information was provided to Sprint by Nortel.

The second step is to accumulate the demand data needed to complete the study. Traffic studies are used to gather MOU and call set-up data. This information is shown on Page 1 of "Common Switching Calculations."

The third step is to determine the number of processor milliseconds required to process each type of call. This information, shown on Page 2 of "Common Switching Calculations", is proprietary to Nortel.

1 The fourth step is to derive monthly expense per
2 investment category by multiplying the investment by the
3 appropriate forward-locking annual charge factor. This
4 is shown on Page 3 of "Common Switching Calculations."

5
6 The fifth step is to calculate the cost per call set-up
7 per call type. This is done by determining the total
8 processor cost per call type, and dividing by the
9 appropriate MOU. This calculation is shown on Page 4 of
10 "Common Switching Calculations."

11
12 The sixth step is to calculate the cost per MOU per call
13 type. This is done by determining the total CCS
14 investment by call type, and dividing by the appropriate
15 MOU. This calculation is shown on Page 5 of "Common
16 Switching Calculations." The TSLRIC results (excluding
17 the common cost factor) for each central office in
18 Florida are summarized in "Local Switching Results",
19 found in the Pricing and Costing Studies, Section E,
20 Local Switching / Features.

21
22 Note that SWIM does not include common costs.

23
24 Q. How and why does SWIM segregate costs?

25 A. The SWIM TSLRIC switching results are segregated into two

1 distinct cost zones:

2

3 1. Host offices, and remote switches within the host
4 office's exchange.

5 2. Remote offices outside of the host office's
6 exchange.

7

8 Switching costs are provided on an exchange basis. Each
9 exchange reflects the cost characteristics of the switch
10 providing service to that exchange. Host switches
11 generally require less investment per line than remotes
12 due to economies of scale. In addition, there are
13 additional costs associated with remote switches,
14 including processor, power, and umbilical investment.
15 Thus these two cost zones reflect the cost differences
16 between exchanges served by a host, and exchanges served
17 solely by a remote.

18

19 Q. How has Sprint developed proposed rates for local
20 switching?

21 A. Sprint supports a usage charge per originating and
22 terminating MOU. However, Sprint is not currently able
23 to bill originating and terminating MOU on a switching
24 port. As an interim, Sprint proposes to bill flat-rate
25 per port surrogate rates based on average MOU in Florida,

1 deaveraged into six rate bands.

2

3 Q. Please describe the rate band development.

4 A. This process consists of six basic steps. First, the
5 individual cost components derived by SWIM are used to
6 develop a composite cost per local switching MOU for each
7 office. An example of this process for the West
8 Kissimmee office is shown on the "Cost Development" page
9 included in the Pricing and Costing Studies, Section E,
10 Local Switching / Features. This process is repeated for
11 every central office.

12

13 The second step is to sort each office from low to high
14 cost, as shown in the "Local Switching Rates Bands" page
15 included in the Pricing and Costing Studies, Section E,
16 Local Switching / Features, Columns A and G. Offices are
17 then grouped into bands such that the variance in usage
18 costs for most offices and their rate band average is
19 less than 10% (see Column O).

20

21 The third step is to aggregate the total MOU for each
22 band (see Column K).

23

24 The fourth step is to aggregate the total costs of each
25 band (see Column T). This aggregate includes MOU cost

1 and the fixed port cost (described in Section II.B.,
2 below).

3
4 The fifth and final step is to add the common cost factor
5 (see Column V). Again, this column includes MOU cost and
6 fixed port cost.

7

8 **B. SWITCHING PORT**

9

10 Q. Please describe the costing methodology for switching
11 ports.

12 A. The total line termination investment for each office is
13 multiplied by the annual charge factor, divided by
14 twelve, and divided by the number of lines per office.
15 The calculations for one particular switch, West
16 Kissimmee, Florida, titled "Local Switching
17 Calculations", can be found in the Pricing and Costing
18 Studies, Section E, Local Switching / Features. This
19 process is repeated for each switch studied.

20

21 **C. FEATURES**

22

23 Q. Please describe the TSLRIC methodology for features.

24 A. The TSLRIC methodology is illustrated on the "Centrex
25 Features", "CLASS Features", and "Custom Calling

1 Features" pages included in the Pricing and Costing
2 Studies, Section E, Local Switching / Features. The
3 TSLRIC methodology consists of five steps. First, the
4 SCIS model is used to determine the cost of the most
5 prevalent features. In total, nineteen Centrex features,
6 nine CLASS features, and eleven Custom Calling Features
7 were studied. Actual usage and demand information for
8 Florida was used in the SCIS model.

9
10 Second, since the SCIS model only considers hardware
11 costs, software costs must be added.

12
13 Third, the annual charge factor is applied to derive an
14 annual cost.

15
16 Fourth, the annual cost is divided by twelve to derive a
17 monthly cost.

18
19 Fifth, and finally, the common cost factor is applied.
20

21 Q. How does Sprint propose to price switching features
22 purchased with an unbundled port?

23 A. Sprint has developed feature packages that CLECs may
24 purchase with a switching port. CLECs may select the
25 individual feature packages they wish to provision on

1 individual access lines. This will prevent the CLEC from
2 being forced to purchase feature capability for their
3 customers who do not desire features, while allowing
4 Sprint to recover its feature-specific costs on a per
5 port basis.

6

7 Q. Should carriers be permitted to purchase unbundled
8 features without purchasing the switching port?

9 A. No. As supported by the FCC, feature capability is an
10 integral part of the switch. Sprint's approach is to
11 allow the CLEC to customize the switching ports it
12 purchases from Sprint. The CLEC cannot purchase feature
13 capability without first purchasing the switching port.

14

15 **III. TANDEM SWITCHING**

16

17 Q. Please describe the TSLRIC methodology for local tandem
18 switching.

19 A. The methodology is the same as for local switching. It
20 is assumed that the cost of local tandem switching is
21 equal to local trunk to trunk switching. An example for
22 the West Kissimmee office is shown in the "Cost
23 Development" page included in the Pricing and Costing
24 Studies, Section E, Local Switching / Features.

25

- 1 Q. What is the rate for local tandem switching?
- 2 A. Sprint calculated a single weighted average rate for its
3 entire service area, as can be seen in the Pricing and
4 Costing Studies, Section D, Tandem Switching.
- 5
- 6 Q. How is the tandem switching rate applied?
- 7 A. If local traffic goes through both a tandem switch and an
8 end-office switch to reach the customer, both rates apply
9 (as well as common transport) and are simply added
10 together.

11

12 **IV. Transport**

13

- 14 Q. What does the FCC Order say about the rates for
15 transport?

16

- 17 A. The FCC Order states,
18 Our rule that dedicated facilities shall
19 be priced on a flat-rated basis applies
20 to dedicated transmission links because
21 these facilities are dedicated to the use
22 of a specific customer. (Paragraph 820).

23

- 24 Typically, transmission facilities between
25 tandem switches and end offices are shared

1 facilities. Pursuant to our rate structure
2 guidelines, states may establish usage-
3 sensitive or flat-rated charges to recover
4 those costs. (Paragraph 822).

5

6 Sprint agrees, and has calculated its TSLRIC for
7 dedicated transport on a flat-rated basis. Sprint has
8 calculated common transport TSLRIC on a per-MOU basis.
9 A summary titled "Transport Cost Model" is included in
10 the Pricing and Costing Studies, Section C, Transport.

11

12 **A. DEDICATED TRANSPORT**

13

14 Q. Please describe the transport TSLRIC methodology for
15 dedicated transport.

16 A. The method is similar for both dedicated and common
17 transport. Sprint created its own Transport Cost Model
18 (TCM), which exists as an Excel workbook. TCM determines
19 the TSLRIC of interoffice transport, individually for
20 each fiber optic transmission ring.

21

22 It is projected that demand will grow approximately 40%
23 over the next five years. Current levels of demand are
24 increased by at least 20% to reflect the mid-point of
25 this projected growth. Existing transmission capacity

1 may be expanded in the TCM in order to meet growth in
2 demand.
3
4 Q. What is the difference between point-to-point and fiber
5 ring transmission systems?
6 A. While I am not an engineer, fiber ring technology
7 represents the current state-of-the-art transport design.
8 The most significant characteristic is the use of fiber
9 rings, rather than point-to-point connections, which
10 provide route diversity. Should the cable making up part
11 of the ring be broken, traffic is automatically rerouted
12 over the remainder of the ring. Ring technology has
13 become the industry standard technology, such that point-
14 to-point systems can no longer be purchased from vendors.
15
16 Q. What percent of Sprint's transmission network in Florida
17 did Sprint model?
18 A. Sprint modeled 100% of its transmission systems in
19 Florida.
20
21 Q. Please describe the TCM.
22 A. An example of the TCM for a single transmission ring,
23 Beverly Hills - Inverness (BVHL - INVR), is included in
24 the Pricing and Costing Studies, Section C, Transport.
25

1 The TCM has two user input sheets, and several
2 calculating worksheets. The first input sheet is
3 "Material Costs." The user inputs the following
4 information.

5
6 Current material cost
7 *Fiber optic cable
8 *Fiber tip cable
9 *Fiber patch panel
10 *Fiber optic terminals (OC-3, OC-12, and OC-48)
11 *OC-3 cards
12 *DS-3 cards
13 *DS-1 cards
14 Installation cost
15 Capacity
16 Utilization factors
17 Pole and conduit factors
18 Annual charge factors
19 Aerial, buried, underground mix

20
21
22 The second input sheet is "Route Information." The user
23 inputs each transport ring, redesigned as necessary using
24 state-of-the-art, forward-looking technology. For
25 example, a current transport system between three

1 locations may be provided through three separate, point-
2 to-point transmission systems. TCM redesigns this
3 network as a single fiber ring with three fiber optic
4 terminals.

5

6 Q. Please describe the calculations performed by the TCM
7 worksheets.

8 A. There are four basic steps to the TCM calculations for
9 dedicated (DS1 and DS3) transport. The first step is
10 performed by Worksheet B of the TCM, which converts the
11 total utilized capacity of each type of transmission
12 equipment into a cost per DS1.

13

14 The second step is performed by Worksheet C, which
15 calculates the costs of each of four types of
16 interconnections. The four interconnection types are DS3
17 termination, DS1 termination, terminal pass-through, and
18 fiber pass-through.

19

20 The third step is performed on Worksheet D, which
21 calculates the cost per route mile of fiber facilities,
22 or transit. This cost includes the costs of providing
23 route diversity, or protection.

24

25 The fourth step is performed by Worksheet E. The

1 termination and transit costs of each fiber ring is
2 determined using the information in Worksheets B, C, and
3 D. The end result is the termination and transit costs
4 of dedicated DS1 and DS3 transport.

5
6 TCM does not include the common cost factor, which is
7 added to the results to develop the forward-looking
8 economic cost.

9

10 Q. Please describe what is meant by "reasonably accurate
11 fill factors" (FCC Order Paragraph 682).

12 A. Fill or utilization factors are the percentage of
13 available network capacity actually used. Utilization is
14 due to three factors.

15

16 1. When engineering and building telecommunications
17 facilities, LECs attempt to anticipate future
18 needs. For example, it is more cost-effective to
19 dig a trench once and install additional
20 facilities, than to dig up the trench and install
21 new facilities every time a new loop is required.

22 2. It is the nature of the telecommunications industry
23 that capacity is acquired in large blocks.
24 Additional capacity will exist while demand grows
25 into the available capacity.

1 3. An engineering interval, a period of time necessary
2 to plan and construct facilities, is required when
3 replacing or expanding capacity.

4
5 Efficient deployment balances the cost-benefit
6 relationship of unused capacity and the cost of
7 installation. Not enough capacity results in inefficient
8 rework (e.g. digging new trenches every month); too much
9 capacity is an inefficient use of resources (e.g.,
10 burying plant that will never be used).

11

12 Q. Is the use of a high, optimal utilization factor
13 appropriate for a primarily rural telephone company such
14 as Sprint - Florida?

15 A. No. A primarily rural telephone company does not have
16 sufficient traffic to maintain a high utilization factor.
17 This is due in large part to the nature of transmission
18 capacity. For example, an OC-3 system has the capacity
19 of 3 DS3s. An OC-12 system has the capacity of 12 DS3s.
20 When an OC-3 system is exhausted and replaced with the
21 larger OC-12 system, its maximum utilization at the time
22 of cut-over is only 25% (3 DS3s / 12 DS3s). In reality,
23 the cut-over takes place prior to absolute exhaustion, so
24 the actual utilization at cut-over must be less than 25%.

25

1 The same phenomenon occurs when cutting over from an OC-
2 12 to an OC-48 system.

3

4 Q. How does Sprint calculate the cost of fiber optic cable
5 material (glass) in the TCM?

6 A. The material (glass) costs of fiber are assigned equally
7 to all installed fibers.

8

9 Q. How does Sprint/United calculate the costs of fiber optic
10 cable installation and sheath in the TCM.?

11 A. An installation and sheath allocation factor is used to
12 reduce transport costs. This factor recognizes two
13 characteristics.

14

15 First, the costs of installation and sheath are assigned
16 to the lighted (in use) fibers only. For example, if
17 only four fibers are required in the foreseeable future
18 for a certain transport route, it may be cost efficient
19 to install a 24-fiber sheath because the incremental cost
20 of actually installing the additional 20 fibers is
21 virtually zero. The unused fiber will be held for future
22 growth, and no additional installation costs will need to
23 be incurred. However, the cost-causer of the initial
24 installation cost is the four lighted fibers, not the 20
25 dark (unused) fibers. Thus it is appropriate to assign

1 the installation costs only to the lighted fibers.

2

3 Second, some fiber rings may use common physical routes
4 and therefore share common cable installation and sheath.

5

6 Q. How are the ring costs converted into transport route
7 prices?

8 A. This process consists of four steps. As an example, the
9 cost of the Beverly Hills - Inverness DS1 route will be
10 described here, and illustrated in Exhibit RGF1. The
11 same process is repeated for each route listed on the
12 "Interoffice Transport Rate Table", included in the
13 Pricing and Costing Studies, Section C, Transport.

14

15 The first step is to sort the termination costs of each
16 individual ring (as determined by the TCM) from low to
17 high, as shown on Exhibit RGF1, pages 1 - 2 of 13. These
18 individual rings are then grouped into three categories,
19 low, medium, and high cost, based upon dividing the
20 entire cost range into three equal parts. Although the
21 three bands are of equal size in terms of cost, the
22 number of rings in each band will vary. The detailed
23 calculations for the Beverly Hills - Inverness (BVHL -
24 INVR) ring are shown on Exhibit RGF1, page 3 of 13. This
25 process is repeated for transit costs on Exhibit RGF1,

1 pages 4 - 7 of 13. An individual ring may be in a low
2 termination cost band and a medium transit cost band, or
3 any other combination.

4
5 The second step is to calculate a weighted average
6 termination and transit costs for the low, medium, and
7 high cost bands. The weighted average cost for the low,
8 medium, and high cost termination bands are [REDACTED]
9 [REDACTED] respectively, as shown on Exhibit
10 RGF1, page 2 of 13. The weighted average cost for the
11 low, medium, and high cost transit bands are [REDACTED]
12 [REDACTED] respectively, as shown on Exhibit
13 RGF1, page 5 of 13.

14
15 The third step is to combine all of the possible low,
16 medium, and high cost band combinations into a single
17 Rate Element Table, as shown on Exhibit RGF1, page 11 of
18 13. There are three types of DS1 ring interconnections,
19 depending upon the type of termination equipment. These
20 are graphically shown on Exhibit RGF1, page 12 of 13.
21 Type A is when both ring terminations are at the DS1
22 level. This will include all single ring configurations,
23 OC-3, OC-12, or OC-48. Type A also occurs in multiple
24 rings when an OC-3 ring is interconnected with any other
25 ring, since OC-3 rings interconnect to other rings at the

1 DS1 level. Type B is when one ring termination is at the
2 DS1 level, while the other is at the DS3 level. OC-12
3 and OC-48 rings interconnect at the DS3 level. Type C is
4 when both ring terminations are at the DS3 level.
5 Detailed calculations for the combination of low
6 termination and low transit are shown on Exhibit RGF1,
7 page 13 of 13.

8
9 The fourth step is to match a specific transport route to
10 with the physical fiber optic rings. The Beverly Hills -
11 Chassahowitzka route traverses two individual rings,
12 Beverly Hills - Inverness (BVHL - INVR), an OC-12 ring;
13 and Chassahowitzka - Homosassa Springs (SR26B CHSW -
14 HMSP), an OC-3 ring. This configuration matches diagram
15 #2 on Exhibit RGF1, page 12 of 13. The cost of this
16 route is simply the sum of the two individual rings.

17
18 This same process is repeated for DS3 dedicated transport
19 (see Exhibit RGF1, pages 7 - 10 of 13).

20
21 **B. COMMON TRANSPORT**

22
23 Q. Please describe your transport TSLRIC methodology for
24 common transport.

25 A. As mentioned above, the method is similar for both

1 dedicated and common transport, except that a fifth step
2 is added.

3

4 The cost per common transport MOU is equal to the average
5 DS1 ring cost, weighted across all routes, divided by
6 216,000 MOU per DS1. 216,000 MOU per DS1 is equal to
7 9,000 MOU per DS0 times 24 voice-grade circuits per DS1,
8 as assumed by the FCC:

9

10 Specifically, when the transport rate
11 restructure was implemented, the initial
12 levels of tandem-switched transmission rates
13 were presumed reasonable if they were based on
14 a weighted per-minute equivalent of direct-
15 trunked transport DS1 and DS3 rates that
16 reflects the relative number of DS1 and DS3
17 circuits used in the tandem to end office
18 links, calculated using a loading factor of
19 9000 minutes per month per voice-grade
20 circuit. (Paragraph 822, Footnote 1949)

21

22 Note that in the May 16, 1997 Order on Access
23 Charge Reform, paragraphs 206 - 209, the FCC
24 indicated that this factor may be too high.

25

- 1 Q. How is the rate for common transport determined?
- 2 A. Sprint calculated a single weighted average rate for its
- 3 entire service area of \$0.000711 per MOU, as can be seen
- 4 on the "Interoffice Transport Rate Table" included in the
- 5 Pricing and Costing Studies, Section C, Transport.

6

7

V. SS7

8

- 9 Q. What are the forward-looking economic costs of common
- 10 channel signaling interconnection?

- 11 A. SS7 interconnection consists of Signal Transfer Point
- 12 (STP) ports, STP transport links, and STP switching
- 13 usage. The costs for these unbundled network elements
- 14 are included in the Pricing and Costing the Pricing and
- 15 Costing Studies, Section G, SS7). The common channel
- 16 signaling interconnection service provides a signaling
- 17 path for Signaling System 7 (SS7) / Common Channel
- 18 Signaling (CCS). The carrier customer is provided with
- 19 an interconnection to the out-of-band signaling network
- 20 in order to transmit and receive information related to
- 21 call completion.

22

23

A. SS7 TRANSPORT LINKS

24

- 25 Q. Please describe the STP Transport Links service.

1 A. The STP transport link represents the facilities to
2 connect from the carrier customers designated premises to
3 the Sprint STP. The link may be provisioned at a DS0 (56
4 Kbps) or as a DS1 (1.544 Mbps), at the option of the
5 requesting carrier. STPs are deployed in mated pairs for
6 network reliability, and interconnecting carriers must
7 provision links to each STP in a mated pair.

8

9 Q. Please describe the TSLRIC methodology for DS1 SS7
10 Transport links.

11 A. The TSLRIC methodology for a DS1 link consists of three
12 steps. First, the average monthly TSLRIC of a DS1 link
13 is determined, as determined from the TCM discussed in
14 Section IV.A.

15

16 Second, the common cost factor is applied.

17

18 Third, the cost of a single DS1/DS0 multiplexer is added.
19 The result is shown on the "SS7 Link Interoffice
20 Transport Cost Support" study included in the Pricing and
21 Costing Studies, Section G, SS7.

22

23 Q. Please describe the TSLRIC methodology for DS0 SS7
24 Transport links.

25 A. The TSLRIC methodology for a DS0 link consists of four

1 steps. First, the average monthly TSLRIC of a DS1 link
2 is determined, as determined from the TCM discussed in
3 Section IV.A.

4
5 Second, this cost is assumed to be shared by four
6 carriers.

7
8 Third, the common cost factor is applied.

9
10 Fourth, the cost of two DS1/DS0 multiplexers (one at each
11 end) is added. The result is shown on the "SS7 Link
12 Interoffice Transport Cost Support" study included in the
13 Pricing and Costing Studies, Section G, SS7.

14
15 Q. Please describe the TSLRIC methodology for DS1 to DS0
16 multiplexing.

17 A. The TSLRIC methodology consists of four steps. First,
18 the EF&I (Engineered, Furnished, and Installed) material
19 cost of a DS1/DS0 multiplexer is determined. This
20 includes the actual equipment vendor price, installation
21 and engineering costs, and any applicable sales taxes.
22 This cost includes six DS0 cards, one for each of four
23 carriers plus two spare.

24
25 Second, a forward-looking annual charge factor is

1 applied.

2

3 Third, this annual cost is divided by twelve to produce
4 a monthly TSLRIC result.

5

6 Fourth, the common cost factor is added to the above
7 TSLRIC result to produce the forward-looking economic
8 cost of the unbundled network element. The result is
9 shown on the "DS1/DS0 Mux Cost Support" study included in
10 the Pricing and Costing Studies, Section G, SS7.

11

12 B. STP PORTS

13

14 Q. Please describe the STP Port service.

15 A. The STP port provides the customer access to the Sprint
16 STP, which acts as a packet switch to route out-of-band
17 signaling. It is in some respects similar to the concept
18 of access to a local switch through a port. An STP port
19 requires use of a link port card and processor costs.

20

21 Q. Please describe the TSLRIC methodology for the STP Port.

22 A. The TSLRIC methodology is summarized in the Pricing and
23 Costing Studies, Section G, SS7.

24

25 The TSLRIC methodology consists of four steps. First,

1 the EF&I (Engineered, Furnished, and Installed) material
2 cost of the Link Port Card, MP1624 Processor Card,
3 Cluster Card Kit, and Frame is determined. This includes
4 the actual equipment vendor price, installation and
5 engineering costs, and any applicable sales taxes.

6

7 Second, these investments are adjusted for fill factors
8 and capacity.

9

10 Third, a forward-looking annual charge factor is applied.

11

12 Fourth, this annual cost is divided by twelve to produce
13 a monthly TSLRIC result.

14

15 Fifth, the common cost factor is added to the above
16 TSLRIC result to produce the forward-looking economic
17 cost of the unbundled network element. The result is
18 shown on the "SS7 Port Connection Cost Support" study
19 included in the Pricing and Costing Studies, Section G,
20 SS7.

21

22 Q. Has Sprint developed an SCP interconnection rate?

23 A. No. Sprint does not have an SCP in Florida. When a CLEC
24 interconnects at the Sprint STP, they have access to
25 Call-Related Database service described in Section VI.C,

1 below.

2

3 **C. SS7 SWITCHING**

4

5 Q. Please describe SS7 Switching.

6 A. The SS7 Switching service is for the routing of signaling
7 traffic through the STP, and reflects the relative
8 switching load placed over the STP by ports. The cost of
9 SS7 switching is determined by the number of individual
10 interoffice trunks using an STP port.

11

12 Q. Please describe your TSLRIC methodology for SS7
13 switching.

14 A. Sprint has developed its own levelizing model to develop
15 TSLRIC results when investment must be recovered over an
16 extended period of time.

17

18 The TSLRIC methodology consists of four basic steps.
19 First, the model levelizes total STP - end-office link
20 demand and investment over the economic life of the
21 investment, using the current intrastate rate of return,
22 to develop a total cost per link per month.

23

24 Second, since the SS7 Port investment is already
25 accounted for in Section II.D.2., the port cost is

1 removed from the total cost to develop a net cost per
2 link per month.

3

4 Third, the monthly link cost is then divided by the
5 number of trunks, assuming a 10:1 access line to trunk
6 ratio, to develop a cost per trunk per month.

7

8 Fourth, the common cost factor is applied.

9

10 The result is shown on the "SS7 Usage Component" study
11 included in the Pricing and Costing Studies, Section G,
12 SS7.

13

14 VI. OPERATOR / DIRECTORY ASSISTANCE / CALL RELATED DATA
15 BASE SERVICES

16

17 Q. Please summarize the results of Sprint's cost studies for
18 these services.

19 A. Sprint has developed TSLRIC studies for most of these
20 services. The results can be seen in the Pricing and
21 Costing Studies, Sections H and I.

22

23 Q. Please describe the TSLRIC methodology for these
24 services.

25 A. Except for those services which utilize interstate access

1 tariffs, the following TSLRIC methodology is used for all
2 services

- 3
- 4 1. Determine direct expense associated with the
- 5 service.
- 6 2. Determine the direct investment associated with the
- 7 service.
- 8 3. Multiply the investment by the annual charge factor
- 9 to determine the annual return.
- 10 4. Add the annual return, direct expenses, and other
- 11 direct operating expenses to determine TSLRIC.
- 12 5. Add TSLRIC plus common cost to determine total
- 13 economic cost.
- 14 6. Divide total economic cost by the appropriate
- 15 number of units to determine the total economic
- 16 cost per unit.

17

18 **A. OPERATOR SERVICES**

19

20 Q. Please describe Toll and Local Assistance Service (Live).

21 A. This service provides live assistance to an end user to
22 complete a telephone call. This service requires a live
23 operator and recording equipment for billing and/or
24 completion of the call.

25

1 **B. DIRECTORY ASSISTANCE SERVICES**

2
3 Q. Please describe Directory Assistance Operator Service
4 (Live).

5 A. This service provides live assistance to an end user to
6 obtain directory listing information and/or to complete
7 a telephone call. This service requires a live operator,
8 operator position equipment, networking equipment, and
9 database maintenance.

10
11 Q. Please describe Directory Assistance Database Listing and
12 Update Service.

13 A. This service is the provision of subscriber listing
14 information. This enables the competitive LEC to
15 provision its own directory assistance databases in order
16 to support its own directory assistance service to end
17 users. The major cost is labor.

18
19 Q. Please describe Directory Assistance Database Query
20 Service.

21 A. This service allows the competitive LEC to access
22 Sprint's electronic directory listing information. This
23 service requires hardware, software, and local area
24 networking investment.

25

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C. CALL RELATED DATABASE SERVICES

Q. Please describe the Line Information Database (LIDB) Access Service.

A. This service provides access to billing validation data stored on Sprint's LIDB. Proposed rates are based on Sprint's interstate access tariff.

Q. Please describe the Toll Free Code (TFC) Access Service.

A. This service provides routing services for toll-free 800 and 888 dialed numbers. Proposed rates are based on Sprint's interstate access tariff.

Q. Please describe the Originating Point Code (OPC) Service.

A. This is a manual service which allows Sprint's SS7 network to identify the originating point of a call.

Q. Please describe the Global Title Translation (GTT) Service.

A. This is a manual service which provides translations to the network for routing purposes.

D. MISCELLANEOUS SERVICES

Q. Please describe the 911 Tandem Ports service.

1 A. Where Sprint provides 911 service, the competitive LEC
2 will need to provision trunks from its switch to the
3 Sprint selective routing tandem. The TSLRIC cost for the
4 911 port is included in the pricing and Costing Studies,
5 Section H.

6

7 Q. Does this conclude your direct testimony?

8 A. Yes, it does.

DS1 TERMINATION

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|------------|------------|----------------------------|------------|-----------------|-------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

DS1 TERMINATION

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|-------------------------------|-----------------------|----------------------------|-----------------------------------|-----------------|-------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| Breakpoints | Low Medium High | [REDACTED] | | | |
| Average Average Average | Low Medium High | | Weighted Average [REDACTED] | | |

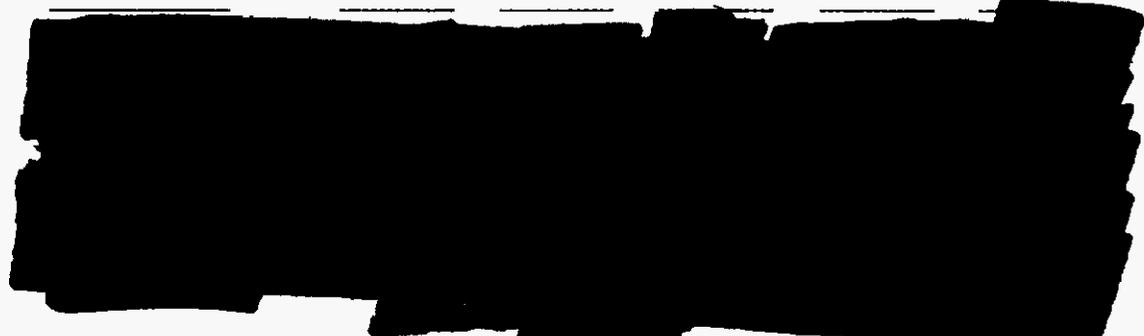
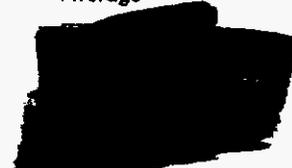
CALCULATIONS FOR DS1 TERMINATION BANDS

Calculations

| | | |
|---|---|--|
| <p>1 INPUTS</p> <p>2 Ring:</p> <p>3 DS1 Single Termination Cost Per Month</p> <p>4 OC DS1 Capacity</p> <p>5 OC Terminal Utilization Factor</p> <p>6 OC48 Availability Factor (OC48 Only)</p> <p>7 Number of Nodes on Ring (OC48 Only)</p> <p>8 Common Factor</p> <p>9</p> <p>10 TERMINATION COST</p> <p>11 Single Termination Cost</p> <p>12 Two Terminations Cost</p> <p>13 Total Termination Cost</p> <p>14</p> <p>15 Working DS1s</p> <p>16</p> <p>17 Total Ring Termination Cost</p> <p>18</p> <p>19</p> <p>20 TERMINATION BAND BREAK POINTS</p> <p>21 Maximum</p> <p>22 Minimum</p> <p>23</p> <p>24 Range</p> <p>25 Band Size</p> <p>26</p> <p>27 Low Band Break Point (Maximum)</p> <p>28 Medium Band Break Point (Maximum)</p> <p>29 High Band (Maximum)</p> <p>30</p> <p>31 WEIGHTED AVERAGE BANDS</p> <p>32 Low Band Break Point (Maximum)</p> <p>33 Medium Band Break Point (Maximum)</p> <p>34 High Band (Maximum)</p> <p>35</p> |     | <p>Source: Transport Cost Model Summary</p> <p>Source: Transport Cost Model Input Sheet #1</p> <p>Source: Transport Cost Model Input Sheet #1</p> <p>L3</p> <p>$2 * L11$</p> <p>$L12 * (1 + L8)$</p> <p>If L4 = 672 or 1344: $L4 * L5 * L6 * L7$</p> <p>If L4 = 84 or 336: $L4 * L5$</p> <p>$L13 * L15$</p> <p>As calculated for each ring</p> <p>As calculated for each ring</p> <p>$L21 - L22$</p> <p>$L24 / 3$</p> <p>$L22 + L25$</p> <p>$L27 + L25$</p> <p>L21</p> <p>For Each Band =</p> <p>$\frac{\Sigma(\text{Total Ring Termination Costs})}{\Sigma(\text{Total Working DS1s})}$</p> |
|---|---|--|

DS1 TRANSIT

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|--|--|---|------|--|--|
|  |  |  | |  |  |

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|--|-----------------------|--|---|-----------------|-------------------|
|  | | | | | |
| | Low Medium High |  | | | |
| | | | Weighted Average | | |
| Average Average Average | Low Medium High | |  | | |

CALCULATIONS FOR DS1 TRANSIT BANDS

Calculations

1 INPUTS

- 2 Ring:
- 3 DS1 Transit Cost Per Month
- 4 OC DS1 Capacity
- 5 OC Terminal Utilization Factor
- 6 OC48 Availability Factor (OC48 Only)
- 7 Number of Nodes on Ring (OC48 Only)
- 8 Common Factor

Source: Transport Cost Model Summary
Source: Transport Cost Model Input Sheet #1
Source: Transport Cost Model Input Sheet #1

11 TRANSIT COST

- 12 Transit Cost \$
- 13 Total Transit Cost \$

L3
 $L12 * (1 + L8)$

- 15 Working DS1s

If L4 = 672 or 1344: $L4 * L5 * L6 * L7$
If L4 = 84 or 336: $L4 * L5$

- 18 Total Ring Transit Cost \$

$L13 * L15$

20 TRANSIT BAND BREAK POINTS

- 21 Maximum \$
- 22 Minimum \$

As calculated for each ring
As calculated for each ring

- 24 Range \$

$L21 - L22$

- 25 Band Size \$

$L24 / 3$

- 27 Low Band Break Point (Maximum) \$

$L22 + L25$

- 28 Medium Band Break Point (Maximum) \$

$L27 + L25$

- 29 High Band (Maximum) \$

L21

31 WEIGHTED AVERAGE BANDS

- 32 Low Band Break Point (Maximum) \$

For Each Band =

- 33 Medium Band Break Point (Maximum) \$

$\Sigma(\text{Total Ring Termination Costs}) /$

- 34 High Band (Maximum) \$

$\Sigma(\text{Total Working DS1s})$

35

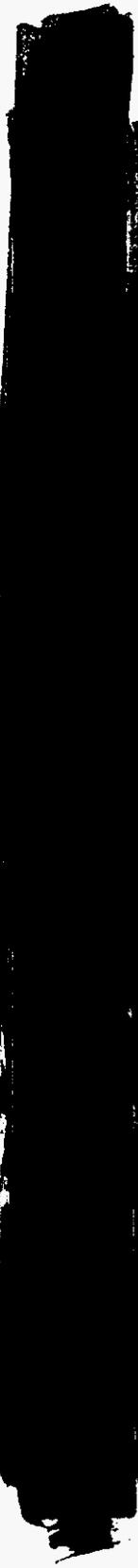
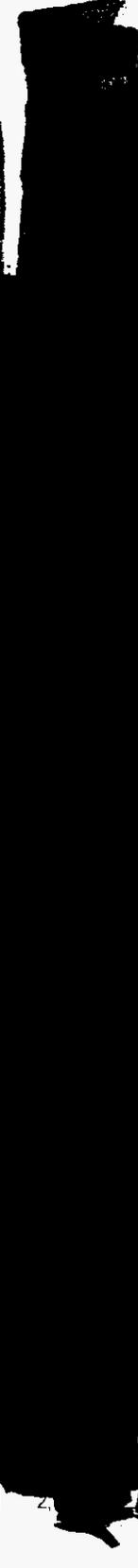
DS3 TERMINATION

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|------------|---------------|----------------------------|------------|-----------------|-------------------|
| [REDACTED] | \$ [REDACTED] | \$ [REDACTED] | [REDACTED] | [REDACTED] | \$ [REDACTED] |

DS3 TERMINATION

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|-------------------------------|-----------------------|----------------------------|---------------------|-----------------|-------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| Breakpoints | Low Medium High | [REDACTED] | | | |
| Average Average Average | Low Medium High | [REDACTED] | Weighted Average | [REDACTED] | |

DS3 TRANSIT

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$\$ |
|--|---|--|---|--|---|
|  | \$  |  |  |  | \$  |

DS3 TRANSIT

| Ring # | Term \$ | With common @ 0.1500 | Band | Working DS1s | Total Term \$s |
|-----------------------|-----------------------|----------------------------|-----------------------------------|-----------------|-------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| | Low Medium High | [REDACTED] | | | |
| Average [REDACTED] | Low Medium High | | Weighted Average [REDACTED] | | |

INTEROFFICE TRANSPORT RATE ELEMENTS

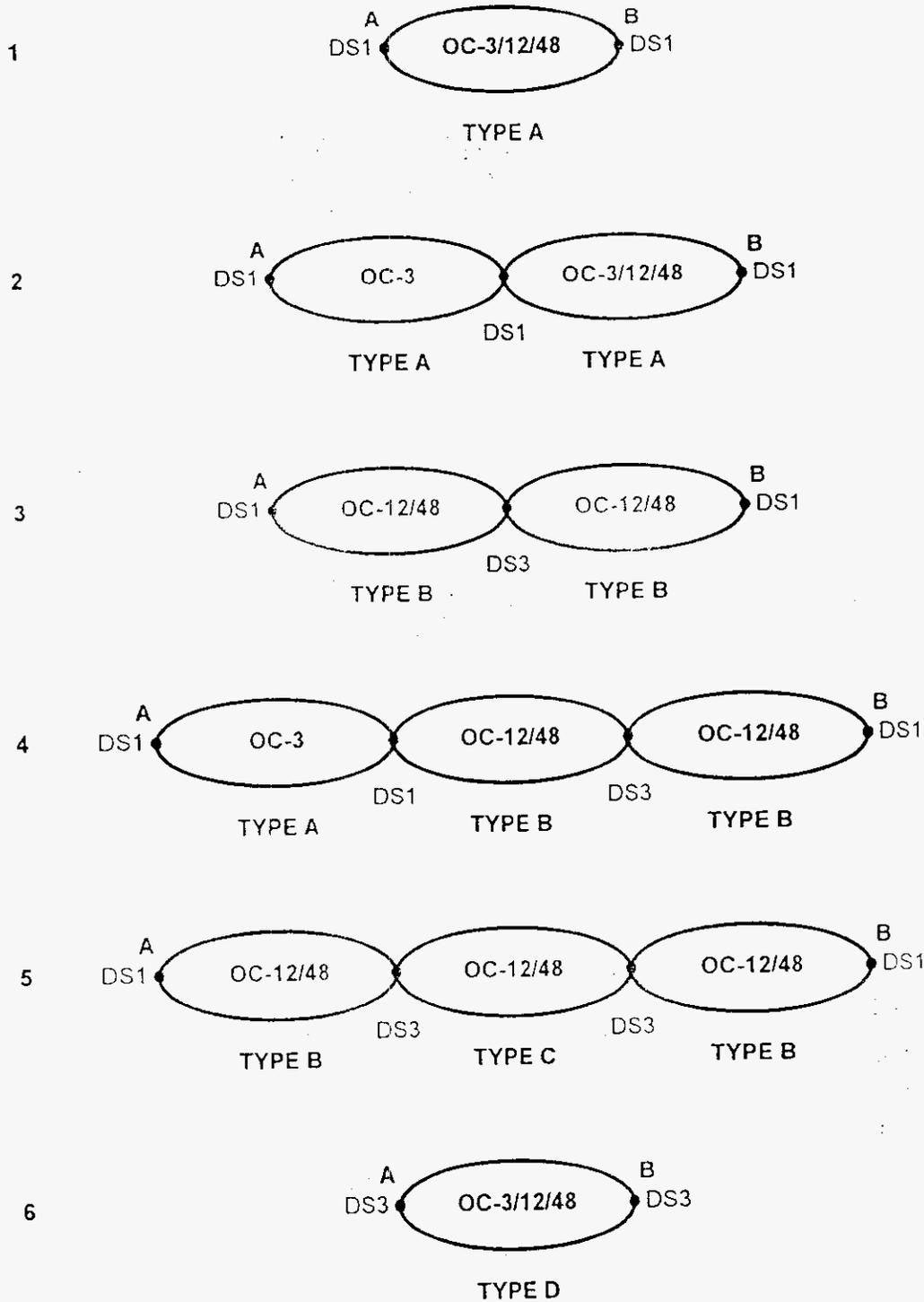
DS1

| B | Weighted Average for Terms | | E | Type A Single and OC3 multiple rings | | | | Type B Multiple rings with one DS3 Term | | | Type C Multiple rings with two DS3 Terms | | | |
|-----------------------|----------------------------|----|---|---|---------------------------------|-------------------|---------------------------------|--|-------------------|---------------------------------|---|-------------------|----|----|
| | C | D | | F | G | H | I | J | K | L | M | N | O | |
| Low Medium High | \$ | \$ | | Rate Element Combinations | Rate Element Combinations | Term + Transit | Rate Element Combinations | Rate Element Combinations | Term + Transit | Rate Element Combinations | Rate Element Combinations | Term + Transit | | |
| | | | | DS1 | HH | \$ | | DS1 | HH | \$ | | DS1 | HH | \$ |
| | | | | DS1 | HL | | | DS1 | HL | | | DS1 | HL | |
| | | | | DS1 | HM | | | DS1 | HM | | | DS1 | HM | |
| | | | | DS1 | LH | | | DS1 | LH | | | DS1 | LH | |
| | | | | DS1 | LL | | | DS1 | LL | | | DS1 | LL | |
| | | | | DS1 | LM | | | DS1 | LM | | | DS1 | LM | |
| | | | | DS1 | MH | | | DS1 | MH | | | DS1 | MH | |
| | | | | DS1 | ML | | | DS1 | ML | | | DS1 | ML | |
| | | | | DS1 | MM | | | DS1 | MM | | | DS1 | MM | |

DS3

| B | Weighted Average for Terms | | E | Type D Single and multiple rings | | |
|-----------------------|----------------------------|---|---------------------------------|-------------------------------------|-------------------|---|
| | C | D | | F | G | H |
| Low Medium High | \$ | | Rate Element Combinations | Rate Element Combinations | Term + Transit | |
| | | | DS3 | HH | | |
| | | | DS3 | HL | | |
| | | | DS3 | HM | | |
| | | | DS3 | LH | | |
| | | | DS3 | LL | | |
| | | | DS3 | LM | | |
| | | | DS3 | MH | | |
| | | | DS3 | ML | | |
| | | | DS3 | MM | | |

APPLICATION OF RATE ELEMENTS



CALCULATIONS FOR RATE ELEMENTS

Example: Low Termination, Low Transit Costs

Calculations

1 **INPUTS**

| | | |
|---------------------------------|----|------------|
| 2 Low Band DS1 Termination Cost | \$ | [REDACTED] |
| 3 Low Band DS1 Transit Cost | \$ | [REDACTED] |
| 4 Low Band DS3 Termination Cost | \$ | [REDACTED] |
| 5 Low Band DS3 Transit Cost | \$ | [REDACTED] |
| 6 DS1s per DS3 | | [REDACTED] |

7

8 **DS1 - SINGLE AND OC3 MULTIPLE RINGS (TYPE A INTERCONNECTION)**

| | | | |
|-------------------------------------|----|------------|-----------|
| 9 LL (Low Termination, Low Transit) | \$ | [REDACTED] | $L2 + L3$ |
|-------------------------------------|----|------------|-----------|

10

11 **DS1 - MULTIPLE RINGS WITH ONE DS3 TERMINATION (TYPE B INTERCONNECTION)**

| | | | |
|--------------------------------------|----|------------|---------------------------------|
| 12 LL (Low Termination, Low Transit) | \$ | [REDACTED] | $(L2 / 2) + (L4 / L6 / 2) + L3$ |
|--------------------------------------|----|------------|---------------------------------|

13

14 **DS1 - MULTIPLE RINGS WITH TWO DS3 TERMINATIONS (TYPE C INTERCONNECTION)**

| | | | |
|--------------------------------------|----|------------|------------------|
| 15 LL (Low Termination, Low Transit) | \$ | [REDACTED] | $(L4 / L6) + L3$ |
|--------------------------------------|----|------------|------------------|

16

17 **DS3 - SINGLE AND MULTIPLE RINGS (TYPE D INTERCONNECTION)**

| | | | |
|--------------------------------------|----|------------|-----------|
| 18 LL (Low Termination, Low Transit) | \$ | [REDACTED] | $L4 + L5$ |
|--------------------------------------|----|------------|-----------|

19