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NANCY B. WHITE
Assistant General Counsel - Florida

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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

August 3, 1998

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

Re: Docket No. 980696-TP (HB4785) Universal Service

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Dr. Randall S. Billingsley, Dr. Robert M. Bowman, D. Daonne Caldwell, G. David Cunningham, Dr. Keven Duffy-Deno and Peter F. Martin, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

RECEIVED & FILED
[Signature]
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Sincerely,
Nancy B. White
Nancy B. White *(NBW)*

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NBW/vf

cc: All parties of record

A. M. Lombardo
R. G. Beatty
William J. Ellenberg II
Billingsley *Bowman* *Caldwell*

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Cunningham Duffy-Deno Martin
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**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 3rd day of August, 1998 to the following:

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Michael Gross, Esquire
Assistant Attorney General
Office of the Attorney General
PL-0 1 The Capitol
Tallahassee, Florida 32399-1050
Tel. No. (850) 414-3300
Fax. No. (850) 488-6589

Tracy Hatch, Esquire (+)
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, Florida 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361

Richard D. Melson, Esquire
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
Tallahassee, Florida 32314
Tel. No. (850) 425-2313
Fax. No. (850) 224-8551
Atty. for MCI

Thomas K. Bond
MCI Metro Access Transmission
Services, Inc.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
Tel. No. (404) 267-6315
Fax. No. (404) 267-5992

Robert M. Post, Jr.
ITS
16001 S.W. Market Street
Indiantown, FL 34956
Tel. No. (561) 597-3113
Fax. No. (561) 597-2115

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road,
MC FLTHOO 107
Tallahassee, Florida 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777

Carolyn Marek
VP Regulatory Affairs
S.E. Region
Time Warner Comm.
2828 Old Hickory Boulevard
Apt. 713
Nashville, TN 37221
Tel. No. (615) 673-1191
Fax. No. (615) 673-1192

Norman H. Horton, Jr., Esquire
Messer, Capareello & Self P. A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire™

David B. Erwin, Esquire
Attorney-at-Law
127 Riversink Road
Crawfordville, Florida 32327
Tel. No. (850) 926-9331
Fax. No. (850) 926-8448
Represents GTC, Frontier,
ITS and TDS

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents WorldCom

Patrick Wiggins, Esquire
Donna L. Canzano, Esquire (+)
Wiggins & Villacorta
2145 Delta Blvd.
Suite 200
Tallahassee, Florida 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008

Kimberly Caswell, Esquire
GTE Florida Incorporated
201 North Franklin Street
16th Floor
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870

Jeffry J. Wahlen, Esquire
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301
Tel. No. (850) 425-5471 or 5487
Fax. No. (850) 222-7560
Represents ALLTEL, NEFTC,
and Vista-United

Tom McCabe
TDS Telecom
107 West Franklin Street
Quincy, FL 32351
Tel. No. (850) 875-5207
Fax. No. (850) 875-5225

Peter M. Dunbar, Esquire
Barbara D. Auger, Esquire
Pennington, Moore, Wilkinson,
& Dunbar, P. A.
215 South Monroe Street
2nd Floor
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Brian Sulmonetti
WorldCom, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

Kelly Goodnight
Frontier Communications
180 South Clinton Avenue
Rochester, New York 14646
Tel. No. (716) 777-7793
Fax. No. (716) 325-1355

Laura Gallagher (+)
VP-Regulatory Affairs
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, Florida 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

Mark Ellmer
GTC Inc.
502 Fifth Street
Port St. Joe, Florida 32456
Tel. No. (850) 229-7235
Fax. No. (850) 229-8689

Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
Live Oak, Florida 32060
Tel. No. (904) 364-2517
Fax. No. (904) 364-2474

Lynne G. Brewer
Northeast Florida Telephone Co.
130 North 4th Street
Macclenny, Florida 32063
Tel. No. (904) 259-0639
Fax. No. (904) 259-7722

James C. Falvey, Esquire
e.spire™ Comm. Inc.
133 National Business Pkwy.
Suite 200
Annapolic Junction, MD 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Lynn B. Hall
Vista-United Telecomm.
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830
Tel. No. (407) 827-2210
Fax. No. (407) 827-2424

William Cox
Staff Counsel
Florida Public Svc. Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6204
Fax. No. (850) 413-6250

Nancy B. White
Nancy B. White (Pnw)

(+) Protective Agreements

ORIGINAL

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF PETER F. MARTIN
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 980696-TP
5
6

7 I. INTRODUCTION
8

9 Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH
10 BELL SOUTH TELECOMMUNICATIONS, INC. (HEREINAFTER
11 REFERRED TO AS "BELL SOUTH" OR "THE COMPANY").
12

13 A. My name is Peter F. Martin and I am employed by BellSouth as a Director in
14 Regulatory. My business address is 675 West Peachtree Street, Atlanta, Georgia
15 30375.
16

17 Q. PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND
18 EXPERIENCE.
19

20 A. I graduated from the Georgia Institute of Technology with a Bachelor of Industrial
21 Engineering Degree in 1981. I was awarded a Master of Business Administration
22 Degree in 1988 from Georgia State University.
23

24 I began employment with Southern Bell in 1981 as an Outside Plant Engineer in
25 Southeast Florida. I have held positions in the Revenue Requirements/Pricing and

1 Pricing and Economics organizations. From June of 1990 to September 1996, I
2 served in BellSouth as a Manager in Regulatory Policy and Planning. I have been
3 in my present position since September 1996.

4
5 Q. HAVE YOU TESTIFIED IN OTHER PLACES ON UNIVERSAL SERVICE?

6
7 A. Yes, I have testified in all nine BellSouth States. In addition, I was a panelist
8 before the Federal-State Joint Board on Universal Service during a workshop that
9 was held in January, 1997 on cost proxy models.

10
11 II. PURPOSE AND SUMMARY

12
13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED TODAY?

14
15 A. My purpose is to address several critical issues surrounding the cost of basic local
16 telecommunications service as it relates to universal service. These issues are
17 outlined in the Commission's Order of July 24, 1998. Specifically, I address the
18 following issue numbers: 1, 2, 3, 5a, 5b, 6a and 6c.

19
20 I also will review the federal universal service mechanism and provide this
21 Commission with the cost of universal service by wire center in BellSouth's
22 service area in Florida. This estimate is based on the cost model attached to Ms.
23 Daonne Caldwell's direct testimony.

24
25 Ms. Caldwell will discuss the BellSouth specific inputs used in the BCPM 3.1.

1 model to calculate the forward-looking economic costs of providing universal
2 service. Dr. Kevin Duffy-Deno and Dr. Bob Bowman will address various
3 aspects of the BCPM 3.1 model.

4
5 It is important that this Commission select a cost proxy model that engineers a
6 forward looking network that would actually transmit telephones calls in a quality
7 manner, and that is based on realistic inputs or universal service itself could be
8 jeopardized. While you sift through detailed arguments regarding the cost of
9 universal service, please remember that the end result should be a sustainable and
10 sufficient universal service fund as required by the Telecommunications Act of
11 1996. Such an outcome will keep basic local rates in this state affordable for
12 many more years to come.

13
14 Q. WHAT SPECIFICALLY WOULD YOU LIKE TO SEE THIS COMMISSION
15 DO?

16
17 A. I propose that the Commission adopt BellSouth's universal service cost
18 calculations for submittal to the state legislature.

19
20 Q. BEFORE YOU ANSWER THE SPECIFIC QUESTIONS SET OUT FOR
21 COMMENTS, CAN YOU PROVIDE SOME BACKGROUND ON WHAT HAS
22 OCCURRED AT THE FCC?

23
24 A. Yes.

1
2 III. THE FCC'S ORDER ON UNIVERSAL SERVICE
3

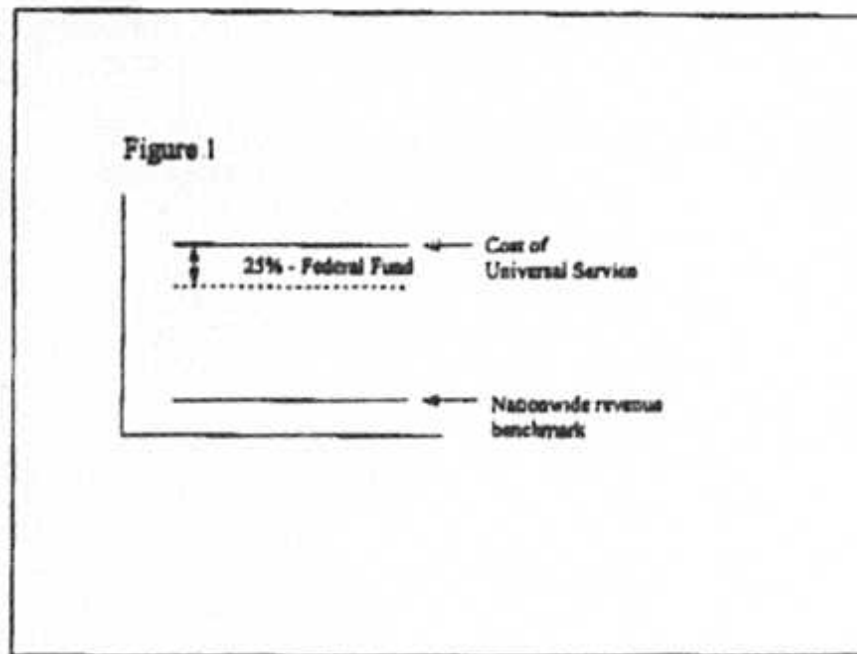
4 Q. WHAT HAS THE FCC DONE ON UNIVERSAL SERVICE?
5

6 A. On May 8, 1997, the FCC issued its Report and Order in CC Docket No. 96-45.
7 In this Report and Order, the FCC adopted many of the recommendations set forth
8 by the Federal-State Joint Board on universal service. The FCC's Order put forth
9 a framework for how much high cost support will be provided from the Federal
10 High Cost Fund. It also provided details on the FCC's proposals for dealing with
11 schools, libraries, health care, and low income support.
12

13 Q. PLEASE DESCRIBE THE FCC'S MECHANISM FOR FUNDING HIGH COST
14 SUPPORT.
15

16 A. The FCC's mechanism for funding high cost support provides explicit support for
17 a small part of the difference between the cost of providing universal service and
18 an FCC revenue benchmark. The FCC method is illustrated in Figure 1 below.
19 The FCC directed that the cost of universal service be calculated using a forward
20 looking cost proxy model, and that it be calculated for areas no larger than wire
21 centers. The cost is next compared to an FCC revenue benchmark. The federal
22 fund will then cover twenty-five percent (25%) of the difference between the cost
23 and the FCC revenue benchmark. If the cost for that area is less than the FCC
24 revenue benchmark, then the federal fund support for that area is zero.
25

1 The FCC has tentatively chosen a \$31 revenue benchmark to calculate universal
2 service support an eligible telecommunications carrier ("ETC") would receive
3 from the federal fund. They could have chosen another benchmark to use in
4 calculating federal support. However, by selecting a \$31 revenue benchmark and
5 a 25/75% jurisdictional split between interstate and intrastate, the FCC effectively
6 has limited federal universal support and left the states to deal with supporting the
7 rest.



21

22

23

24 Q. HOW WILL THE FEDERAL HIGH COST FUND BE SUPPORTED?

25

1 A. All interstate service providers will contribute to the fund based on their
2 nationwide share of interstate revenues received from end users. Access revenue
3 and other wholesale revenue are excluded from this calculation.

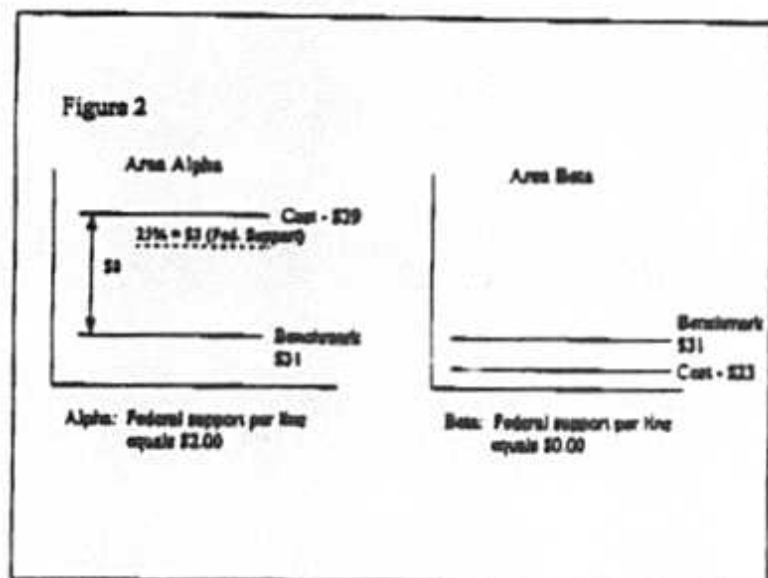
4
5 Q. WHAT DO LOCAL EXCHANGE COMPANIES ("LECS") DO TO REFLECT
6 THE SUPPORT THEY RECEIVE FROM THE FEDERAL FUND?

7
8 A. The FCC will require that LECs make adjustments to their interstate access prices
9 to reflect the net amount of support they will receive from the federal universal
10 service fund. The net amount of support is equal to the amount that BellSouth's
11 receipts from the fund exceed BellSouth's contribution to the fund. Thus,
12 implementation of the Federal Universal Service Fund will be revenue neutral to
13 the LECs on day one. LECs reduce their prices by the net amount of funding they
14 receive from the universal service fund.

15
16 Q. CAN YOU PROVIDE SOME EXAMPLES OF HOW THE FEDERAL
17 MECHANISM WILL WORK?

18
19 A. Certainly. Assume that there is a company that serves two census block groups
20 (CBGs) called Alpha and Beta. A cost model, which the FCC has promised to
21 designate by the end of this year, will calculate the monthly per line cost of
22 universal service as \$39.00 in Alpha and as \$23.00 in Beta. These costs are then
23 compared to the FCC revenue benchmark, which is tentatively set at \$31.00 for
24 residential lines. This is illustrated in Figure 2. In area Alpha, the difference
25 between the monthly cost and the benchmark is \$8.00. Under the FCC's

1 mechanism, the FCC will provide twenty-five percent (25%) of this amount, or
2 \$2.00, in monthly support to any ETC that provides universal service in this area.
3 In area Beta, the cost is less than the benchmark, so the FCC's mechanism does
4 not provide any support out of the federal fund.
5
6



18 Q. IS THAT ALL THERE IS TO THE FEDERAL HIGH COST FUND?

19

20 A. Yes. Conceptually, it is a simple framework, and it should be relatively easy to
21 construct a state-high cost fund that will fit well with the federal fund. To do so,
22 the Florida Commission should first adopt a reasonable cost proxy model, such as
23 the BCPM 3.1. The Florida Commission should then have a proceeding to deal
24 with the remaining universal service issues so that it can establish a Florida
25 Universal Service Fund.

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Q. HASN'T THE FCC REFERRED MANY OF THE ABOVE ISSUES BACK TO THE JOINT BOARD, AND WHAT WILL BE THE IMPACT OF CHANGES IN THE FCC'S APPROACH?

A. On July 17, 1998, the FCC referred several issues back to the Federal-State Joint Board for consideration. Such issues as the 25% federal factor and the revenue assessment base were sent back to the Joint Board. It is certainly possible that changes to the federal mechanism will result from this referral. However, the focus of this proceeding (the cost of universal service) is unaffected by the FCC's referral of issues back to the Joint Board.

IV. THE NEED FOR A STATE HIGH COST FUND

Q. DOES THE CREATION OF A FEDERAL FUND NEGATE THE NEED FOR A STATE HIGH COST FUND?

A. No, it does not. The federal fund only deals with a small part of the implicit support that is currently built into LEC rates. State universal service support mechanisms will need to deal with the remainder of the implicit universal service support. The FCC recognized this fact in its Access Reform Order, wherein it strongly encouraged states to identify and address the amount of implicit support built into intrastate rates. In a speech given by William Kennard on February 9, 1998 to the National Association of State Utility Consumer Advocates, the FCC

1 Chairman said that "states have an obligation to take all reasonable steps as
2 promptly as possible to reform existing intrastate universal service support
3 mechanisms to make them compatible with competitive local markets by making
4 the subsidies explicit and portable." The United States Congress also recognized
5 the need for state funding mechanisms. Indeed, one of the principles set forth in
6 the Telecommunications Act of 1996 ("the Act") is that "[t]here should be
7 specific, predictable and sufficient federal and state mechanisms to preserve and
8 advance universal service." (47 U.S.C. Section 254(b)(5)) In fact, Section 254(f)
9 of the Communications Act requires that "Every telecommunications carrier that
10 provides intrastate telecommunications services shall contribute, on an equitable
11 and nondiscriminatory basis, in a manner determined by the State to the
12 preservation and advancement of universal service in that State."

13
14 Finally, Chapter 364 .025(4)(b), Florida Statutes, requires this Commission to
15 report on the cost of universal service to the Legislature by February 15, 1999 in
16 order for the Legislature to establish a permanent universal service mechanism.

17
18 Q. CAN RATES THAT CURRENTLY PROVIDE IMPLICIT SUPPORT FOR
19 UNIVERSAL SERVICE BE SUSTAINED IN A COMPETITIVE
20 ENVIRONMENT?

21 =
22 A. No. Competitors will target customers who currently provide the most implicit
23 support. They will target high revenue business customers, and those residential
24 customers that purchase considerable amounts of vertical and/or toll services.
25 Competitors will market their services only to these high margin ILEC customers

1 and leave the remaining high cost customers to the incumbent LEC. Indeed, even
2 AT&T and MCI agree that implicit subsidies are not sustainable in a competitive
3 environment (ATT, Dr. Kaserman Direct Testimony, NC Docket No. P-100, Sub
4 133B, Page 9, "...the system is unsustainable in a competitive market
5 environment. Where they are allowed to operate, market forces will inexorably
6 eliminate cross-subsidies."; MCI, Dr. Cabe Direct Testimony, KY Admin. Case
7 No. 360, page 13, "... competition in local and intralata toll markets can be
8 expected to drive the prices of vertical and toll services below levels that have
9 been sustainable in the historically monopoly environment.").
10

11 Q. DOES BELLSOUTH HAVE A PROPOSAL FOR A STATE UNIVERSAL
12 SERVICE FUND?
13

14 A. Yes. However, since this proceeding is narrowly focused on the cost of universal
15 service, I will save discussion of BellSouth's proposal for a future proceeding.
16

17 Q: FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL
18 TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING
19 A PERMANENT UNIVERSAL SERVICE MECHANISM, WHAT IS THE
20 APPROPRIATE COST PROXY MODEL TO DETERMINE THE TOTAL
21 FORWARD-LOOKING COST OF PROVIDING BASIC LOCAL
22 TELECOMMUNICATIONS SERVICE PURSUANT TO SECTION 364.025
23 (4)(b), FLORIDA STATUTES? (ISSUE 2)
24

1 A: The BCPM 3.1 model is the appropriate cost proxy model for determining the
2 total forward-looking cost of providing basic local telecommunications service. It
3 was designed for this purpose and meets the ten criteria set out in the FCC's
4 Universal Service Order of May 8, 1997. BellSouth has run the BCPM 3.1
5 model for Florida and the results for BellSouth's territory by wire center are
6 attached as Exhibit PFM-1. BellSouth recommends that the Commission use the
7 BCPM 3.1 model with the inputs recommended by BellSouth for calculating the
8 total forward looking cost of basic local telecommunications service for
9 BellSouth.

10
11
12 V. ISSUES LIST

13
14 Q: WOULD YOU NOW SPECIFICALLY DISCUSS THE OTHER ISSUES
15 PARTICULAR TO THIS DOCKET?

16
17 A: Yes.

18
19 Q: WHAT IS THE DEFINITION OF THE BASIC LOCAL
20 TELECOMMUNICATIONS SERVICE REFERRED TO IN SECTION
21 364.025(4)(B)? (ISSUE 1)

22
23 A. Basic local telecommunications service is defined in Florida Statute 364.02 (2)
24 which states:

1 "Basic local telecommunications service" means voice-grade, flat-rate
2 residential, and flat-rate single-line business local exchange services
3 which provide dial tone, local usage necessary to place unlimited calls
4 within a local exchange area, dual tone multifrequency dialing, and
5 access to the following: emergency services such as "911," all locally
6 available interexchange companies, directory assistance, operator
7 services, relay services, and an alphabetical directory listing. For a
8 local exchange telecommunications company, such term shall include
9 any extended area service routes, and extended calling service in
10 existence or ordered by the commission on or before July 1, 1995.

11
12
13 Q. FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL
14 TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A
15 PERMANENT UNIVERSAL SERVICE MECHANISM, SHOULD THE
16 TOTAL FORWARD-LOOKING COST OF BASIC LOCAL
17 TELECOMMUNICATIONS SERVICE PURSUANT TO SECTION
18 364.025(4)(b), FLORIDA STATUTES, BE DETERMINED BY A COST
19 PROXY MODEL ON A BASIS SMALLER THAN A WIRE CENTER? IF SO,
20 ON WHAT BASIS SHOULD IT BE DETERMINED? (ISSUE 3)

21 =

22 A. Initially, the forward-looking cost of basic local telecommunications should be
23 calculated at the wire center level. Current telecommunications providers capture
24 data at this level of aggregation on a standardized basis. Therefore, a wire center

1 basis for cost calculation would be less burdensome initially than going to a more
2 targeted area of measure like a census block group (CBG).

3
4 However, the Commission's goal should be to move the basis of support
5 calculations from a wire center to a CBG basis (a smaller geographic area) for two
6 reasons. First, small areas more accurately target universal service support to
7 areas with high costs. Within a wire center, costs can vary greatly. By choosing a
8 smaller area (a CBG), the accuracy of calculations are greater than when numbers
9 are aggregated to the wire center level. Second, choosing small areas not only as
10 the basis for universal service support but also as the basis for designating service
11 areas for ETCs enables new competitive entrants to compete as an ETC and
12 receive universal service support, without having to serve an extended service
13 area (such as a wire center).

14
15 Q. FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL
16 TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING
17 A PERMANENT UNIVERSAL SERVICE MECHANISM, FOR WHICH
18 FLORIDA LOCAL EXCHANGE COMPANIES MUST THE COST OF BASIC
19 LOCAL TELECOMMUNICATIONS SERVICE BE DETERMINED USING
20 THE COST PROXY MODEL IDENTIFIED IN ISSUE 2? (ISSUE 5A)

21 =

22 A. The FCC stated in paragraph 232 of its Universal Service Order that a cost proxy
23 model should be used when calculating the forward-looking economic cost for
24 non-rural LECs. The non-rural LECs operating in Florida are BellSouth, Sprint,
25 and GTE.

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The FCC has decided that rural carriers would not use forward looking economic cost models until further review by the FCC and not prior to January 1, 2001.

Further, the FCC states that rural carriers would be gradually transitioned from the current mechanism to a forward-looking economic cost model.(para. 203)

BellSouth believes that the bifurcated approach set out by the FCC (i.e. - treat non-rural and rural companies separately) is reasonable for use in Florida.

Q. FOR EACH OF THE LECS IDENTIFIED IN (5A), WHAT COST RESULTS FROM USING THE INPUT VALUES IDENTIFIED IN ISSUE 4 IN THE COST PROXY MODEL IDENTIFIED IN ISSUE 2? (ISSUE 5B)

A. The forward-looking costs for BellSouth from the BCPM 3.1 are attached in Exhibit PFM-1. It provides the cost by wire center for BellSouth's designated service area. These costs are based on the forward-looking inputs as provided in Ms. Daonne Caldwell's direct testimony.

Q. FOR PURPOSES OF DETERMINING THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE APPROPRIATE FOR ESTABLISHING A PERMANENT UNIVERSAL SERVICE MECHANISM, SHOULD THE COST OF BASIC LOCAL TELECOMMUNICATIONS SERVICE FOR EACH OF THE LECS THAT SERVE FEWER THAN 100,000 ACCESS LINES BE COMPUTED USING THE COST PROXY MODEL IDENTIFIED IN ISSUE 2 WITH THE INPUT VALUES IDENTIFIED IN ISSUE 4? (ISSUE 6A)

1 A. No.

2

3 Q. IF NOT, FOR EACH OF THE FLORIDA LECs THAT SERVE FEWER THAN
4 100,000 ACCESS LINES, WHAT APPROACH SHOULD BE EMPLOYED TO
5 DETERMINE THE COST OF BASIC LOCAL TELECOMMUNICATIONS
6 SERVICE AND WHAT IS THE RESULTING COST? (ISSUE 6C)

7

8 A. The Commission should refrain at this time from using a cost proxy model for
9 LECs serving fewer than 100,000 access lines. These carriers should generally
10 fall into the definition of "rural LECs", and as such should use embedded costs in
11 determining the cost of basic local telecommunications service. This
12 methodology is consistent with the FCC's determination in their Universal
13 Service Order.

14

15

XV. SUMMARY AND CONCLUSION

16

17 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

18

19 A. It is critically important that this Commission get the cost of universal service
20 right. Consumers will be ill served if the costs are underestimated. The BCPM
21 cost model is an excellent tool for calculating the cost of universal service. The
22 inputs that BellSouth recommends be used in the model are both "real world" in
23 nature and representative of what an efficient provider would incur in building a
24 forward looking network capable of providing high quality basic local exchange
25 service. BellSouth's cost estimations should be approved by this Commission for

1 submittal to the Florida Legislature, and for subsequent use in the establishment
2 of a state universal service fund.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes, it does.

7

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Florida WIRE CENTER LEVEL DATA							
WC by							
Bellcore	Exchange	Exchange					
CLLI code	CLLI	Name	RG	Residence Flat Rate	Business Flat Rate	SLC	BCPM 3.1 Cost/Ln (incl grt)
ARCHFLMA	ARCHFL	ARCHER	5	\$8.80	\$23.85	\$3.50	\$60.08
BCRTFLBT	BCRTFL	BOCA RATON	10	\$10.35	\$28.00	\$3.50	\$24.81
BCRTFLMA	BCRTFL	BOCA RATON	10	\$10.35	\$28.00	\$3.50	\$27.90
BCRTFLSA	BCRTFL	BOCA RATON	10	\$10.35	\$28.00	\$3.50	\$30.00
BGPIFLMA	BGPIFL	BIG PINE	X1	\$10.50	\$28.63	\$3.50	\$41.26
BKVLFLJF	BKVLFL	BROOKSVILLE	5	\$8.80	\$23.85	\$3.50	\$49.26
BLDWFLMA	BLDWFL	BALDWIN	9	\$10.05	\$27.40	\$3.50	\$46.35
BLGLFLMA	BLGLFL	BELLE GLADE	3	\$8.10	\$21.90	\$3.50	\$33.75
BNNFLMA	BNNFL	BUNNELL	3	\$8.10	\$21.90	\$3.50	\$47.75
BRSNFLMA	BRSNFL	BRONSON	X2	\$11.00	\$29.81	\$3.50	\$58.40
BYBHFLMA	BYBHFL	BOCA RATON	10	\$10.35	\$28.00	\$3.50	\$30.50
CCBHFLAF	CCBHFL	COCOA BEACH	7	\$9.50	\$25.75	\$3.50	\$54.25
CCBHFLMA	CCBHFL	COCOA BEACH	7	\$9.50	\$25.75	\$3.50	\$30.56
CDKYFLMA	CDKYFL	CEDAR KEY	1	\$7.30	\$19.80	\$3.50	\$55.71
CFLDFLMA	CFLDFL	CHIEFLAND	3	\$8.10	\$21.90	\$3.50	\$66.66
CHPLFLJA	CHPLFL	CHIPLEY	3	\$8.10	\$21.90	\$3.50	\$56.32
CNTMFLLE	CNTMFL	CANTONMENT	6	\$9.15	\$24.90	\$3.50	\$42.96
COCOFLMA	COCOFL	COCOA	7	\$9.50	\$25.75	\$3.50	\$34.50
COCOFLME	COCOFL	COCOA	7	\$9.50	\$25.75	\$3.50	\$33.09
CSCYFLBA	CSCYFL	CROSS CITY	2	\$7.70	\$20.80	\$3.50	\$50.55
DBRYFLDL	DBRYFL	DEBARY	5	\$8.80	\$23.85	\$3.50	\$38.08
DBRYFLMA	DBRYFL	DEBARY	5	\$8.80	\$23.85	\$3.50	\$36.67
DELDFLMA	DELDFL	DELAND	5	\$8.80	\$23.85	\$3.50	\$35.87
DLBHFLKP	DLBHFL	DELRAY BEACH	8	\$9.80	\$26.60	\$3.50	\$29.47
DLBHFLMA	DLBHFL	DELRAY BEACH	8	\$9.80	\$26.60	\$3.50	\$30.88
DLSPFLMA	DLSPFL	DELEON SPRINGS	4	\$8.40	\$22.90	\$3.50	\$52.56
DNLNFLWM	DNLNFL	DUNNELLON	6	\$9.15	\$24.90	\$3.50	\$55.27
DRBHFLMA	DRBHFL	DEERFIELD BEACH	12	\$10.65	\$29.10	\$3.50	\$28.76
DYBHFLFN	DYBHFL	DAYTONA BEACH	6	\$9.15	\$24.90	\$3.50	\$27.16
DYBHFLMA	DYBHFL	DAYTONA BEACH	6	\$9.15	\$24.90	\$3.50	\$30.51
DYBHFLQB	DYBHFL	DAYTONA BEACH	6	\$9.15	\$24.90	\$3.50	\$35.42
DYBHFLQS	DYBHFL	DAYTONA BEACH	6	\$9.15	\$24.90	\$3.50	\$34.63
DYBHFLPO	DYBHFL	DAYTONA BEACH	6	\$9.15	\$24.90	\$3.50	\$33.05
EGLLFLBG	EGLLFL	EAU GALLIE	7	\$9.50	\$25.75	\$3.50	\$31.44
EGLLFLIH	EGLLFL	EAU GALLIE	7	\$9.50	\$25.75	\$3.50	\$33.37
EORNFLMA	EORNFL	EAST ORANGE	11	\$10.45	\$28.60	\$3.50	\$50.98
FLBHFLMA	FLBHFL	FLAGLER BEACH	3	\$8.10	\$21.90	\$3.50	\$38.96
FRBHFLFP	FRBHFL	FERNANDINA BEACH	3	\$8.10	\$21.90	\$3.50	\$36.02
FTGRFLMA	FTGRFL	FORT GEORGE	9	\$10.05	\$27.40	\$3.50	\$42.53
FTLDFLCR	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$28.16
FTLDFLCY	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$26.13
FTLDFLJA	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$29.10
FTLDFLMR	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$27.80
FTLDFLOA	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$28.63
FTLDFLPL	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$32.22
FTLDFLSG	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$24.46
FTLDFLSU	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$29.42
FTLDFLWN	FTLDFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$26.23
FTRPFLMA	FTRPFL	FORT PIERCE	5	\$8.80	\$23.85	\$3.50	\$36.61
GCSPPFLCN	GCSPPFL	GREEN COVE SPRINGS	3	\$8.10	\$21.90	\$3.50	\$47.51

Florida WIRE CENTER LEVEL DATA							
WC by							
Bellcore	Exchange	Exchange		Residence	Business		BCPM 3.1 Cost/Ln
CLLI code	CLLI	Name	RG	Flat Rate	Flat Rate	SLC	(incl grt)
GCVLFLMA	GCVLFL	GRACEVILLE	3	\$8.10	\$21.90	\$3.50	\$67.46
GENVFLMA	GENVFL	GENEVA	7	\$9.50	\$25.75	\$3.50	\$55.76
GLBRFLMC	GLBRFL	GULF BREEZE	6	\$9.15	\$24.90	\$3.50	\$36.58
GSVLFLMA	GSVLFL	GAINESVILLE	6	\$9.15	\$24.90	\$3.50	\$29.87
GSVLFLNW	GSVLFL	GAINESVILLE	6	\$9.15	\$24.90	\$3.50	\$30.93
HAVNFLMA	HAVNFL	HAVANA	6	\$9.15	\$24.90	\$3.50	\$51.47
HBSDFLMA	HBSDFL	HOBE SOUND	6	\$9.15	\$24.90	\$3.50	\$35.72
HLNVFLMA	HLNVFL	HOLLEY NAVARRE	6	\$9.15	\$24.90	\$3.50	\$45.70
HLWDFLHA	HLWDFL	FORT LAUDERDALE	12	\$10.65	\$29.10	\$3.50	\$25.79
HLWDFLMA	HLWDFL	FORT LAUDERDALE	12	\$10.65	\$29.10	\$3.50	\$28.72
HLWDFLPE	HLWDFL	FORT LAUDERDALE	12	\$10.65	\$29.10	\$3.50	\$32.19
HLWDFLWH	HLWDFL	FORT LAUDERDALE	12	\$10.65	\$29.10	\$3.50	\$31.76
HMSTFLEA	HMSTFL	HOMESTEAD	12	\$10.65	\$29.10	\$3.50	\$95.69
HMSTFLHM	HMSTFL	HOMESTEAD	12	\$10.65	\$29.10	\$3.50	\$29.93
HMSTFLNA	HMSTFL	HOMESTEAD	12	\$10.65	\$29.10	\$3.50	\$50.08
HTISFLMA	HTISFL	JENSEN BEACH	6	\$9.15	\$24.90	\$3.50	\$32.16
HWTHFLMA	HWTHFL	HAWTHORNE	5	\$8.80	\$23.65	\$3.50	\$74.07
ISLMFLMA	ISLMFL	ISLAMORADA	4	\$8.40	\$22.90	\$3.50	\$34.23
JAY-FLMA	JAY-FL	JAY	X3	\$11.44	\$31.13	\$3.50	\$88.88
JCBHFLAB	JCBHFL	JACKSONVILLE BEACH	9	\$10.05	\$27.40	\$3.50	\$30.55
JCBHFLMA	JCBHFL	JACKSONVILLE BEACH	9	\$10.05	\$27.40	\$3.50	\$31.53
JCBHFLSP	JCBHFL	JACKSONVILLE BEACH	9	\$10.05	\$27.40	\$3.50	\$26.24
JCVLFLAR	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$30.55
JCVLFLBW	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$30.84
JCVLFLCCL	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$27.47
JCVLFLFC	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$31.84
JCVLFLIA	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$25.66
JCVLFLJT	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$20.11
JCVLFLLF	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$37.44
JCVLFLNO	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$34.68
JCVLFLOW	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$36.69
JCVLFLRV	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$34.37
JCVLFLSJ	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$30.15
JCVLFLSM	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$27.38
JCVLFLWC	JCVLFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$33.08
JPTRFLMA	JPTRFL	JUPITER	9	\$10.05	\$27.40	\$3.50	\$32.13
KYHGFLMA	KYHGFL	KEYSTONE HEIGHTS	3	\$8.10	\$21.90	\$3.50	\$54.29
KYLRFLLS	KYLRFL	KEY LARGO	4	\$8.40	\$22.90	\$3.50	\$36.25
KYLRFLMA	KYLRFL	KEY LARGO	4	\$8.40	\$22.90	\$3.50	\$35.64
KYWSFLMA	KYWSFL	KEY WEST	4	\$8.40	\$22.90	\$3.50	\$27.59
LKCYFLMA	LKCYFL	LAKE CITY	4	\$8.40	\$22.90	\$3.50	\$46.45
LKMRFLAB	LKMRFL	SANFORD	8	\$9.80	\$26.60	\$3.50	\$32.38
LKMRFLMA	LKMRFL	SANFORD	8	\$9.80	\$26.60	\$3.50	\$25.31
LYHNFLOH	LYHNFL	LYNN HAVEN	5	\$8.80	\$23.65	\$3.50	\$42.78
MCNPFLMA	MCNPFL	MICANOPY	5	\$8.80	\$23.65	\$3.50	\$74.27
MOBGFLPM	MOBGFL	MIDDLEBURG	9	\$10.05	\$27.40	\$3.50	\$47.14
MIAMFLAE	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$26.26
MIAMFLAL	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$30.29
MIAMFLAP	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$22.78
MIAMFLBA	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$26.58

Florida WIRE CENTER LEVEL DATA							
WC by							
Bellcore		Exchange		Exchange			
CLLI code	CLLI	Name	RG	Residence Flat Rate	Business Flat Rate	SLC	BCPM 3.1 Cost/Ln (incl grt)
MIAMFLBC	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$27.47
MIAMFLBR	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$23.60
MIAMFLCA	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$30.26
MIAMFLFL	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$26.43
MIAMFLGR	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$20.74
MIAMFLHL	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$28.09
MIAMFLIC	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$25.44
MIAMFLKE	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$23.42
MIAMFLME	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$24.47
MIAMFLNM	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$26.67
MIAMFLNS	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$33.39
MIAMFLOL	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$33.52
MIAMFLPB	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$29.37
MIAMFLPL	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$27.92
MIAMFLRR	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$30.24
MIAMFLSH	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$32.24
MIAMFLSO	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$31.65
MIAMFLVD	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$33.34
MIAMFLWM	MIAMFL	MIAMI	12	\$10.65	\$29.10	\$3.50	\$27.31
MICCFLLB	MICCFL	SEBASTIAN	6	\$9.15	\$24.90	\$3.50	\$29.52
MLBRFLMA	MLBRFL	MELBOURNE	7	\$9.50	\$25.75	\$3.50	\$34.36
MLTNFLRA	MLTNFL	MILTON	6	\$9.15	\$24.90	\$3.50	\$42.75
MNDRFLAV	MNDRFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$23.26
MNDRFLLO	MNDRFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$31.02
MNDRFLW	MNDRFL	JACKSONVILLE	10	\$10.35	\$28.00	\$3.50	\$35.96
MNSNFLMA	MNSNFL	MUNSON	6	\$9.15	\$24.90	\$3.50	\$102.26
MRTFLVE	MRTFL	MARATHON	3	\$8.10	\$21.90	\$3.50	\$36.01
MXVFLMA	MXVFL	MAXVILLE	9	\$10.05	\$27.40	\$3.50	\$73.67
NDADFLAC	NDADFL	NORTH DADE	12	\$10.65	\$29.10	\$3.50	\$28.27
NDADFLBR	NDADFL	NORTH DADE	12	\$10.65	\$29.10	\$3.50	\$32.13
NDADFLGG	NDADFL	NORTH DADE	12	\$10.65	\$29.10	\$3.50	\$29.05
NDADFLLOL	NDADFL	NORTH DADE	12	\$10.65	\$29.10	\$3.50	\$24.06
NKLRFLMA	NKLRFL	NORTH KEY LARGO	3	\$8.10	\$21.90	\$3.50	\$34.67
NSBHFLMA	NSBHFL	NEW SMYRNA BEACH	4	\$8.40	\$22.90	\$3.50	\$37.02
NWBYFLMA	NWBYFL	NEWBERRY	5	\$8.80	\$23.85	\$3.50	\$53.70
OKHLFLMA	OKHLFL	OAK HILL	4	\$8.40	\$22.90	\$3.50	\$48.95
OLTWFLN	OLTWFL	OLD TOWN	2	\$7.70	\$20.80	\$3.50	\$70.87
ORLDFLAP	ORLDFL	ORLANDO	11	\$10.45	\$28.60	\$3.50	\$31.27
ORLDFLCL	ORLDFL	ORLANDO	11	\$10.45	\$28.60	\$3.50	\$30.36
ORLDFLMA	ORLDFL	ORLANDO	11	\$10.45	\$28.60	\$3.50	\$28.14
ORLDFLPC	ORLDFL	ORLANDO	11	\$10.45	\$28.60	\$3.50	\$29.75
ORLDFLPH	ORLDFL	ORLANDO	11	\$10.45	\$28.60	\$3.50	\$31.81
ORLDFLSA	ORLDFL	ORLANDO	11	\$10.45	\$28.60	\$3.50	\$29.40
ORPKFLMA	ORPKFL	ORANGE PARK	9	\$10.05	\$27.40	\$3.50	\$32.33
ORPKFLRW	ORPKFL	ORANGE PARK	9	\$10.05	\$27.40	\$3.50	\$31.76
OVIDFLCA	OVIDFL	OVIDO	11	\$10.45	\$28.60	\$3.50	\$33.74
PACEFLPV	PACEFL	PACE	6	\$9.15	\$24.90	\$3.50	\$44.20
PAHKFLMA	PAHKFL	PAHOKEE	3	\$8.10	\$21.90	\$3.50	\$43.16
PCBHFLNT	PCBHFL	PANAMA CITY BEACH	5	\$8.80	\$23.85	\$3.50	\$37.41
PLCSFLMA	PLCSFL	PALM COAST	3	\$8.10	\$21.90	\$3.50	\$37.45

Florida		WIRE CENTER LEVEL DATA					
WC by							
Bellcore	Exchange	Exchange		Residence	Business		BCPM 3.1 Cost/Ln
CLLI code	CLLI	Name	RG	Flat Rate	Flat Rate	SLC	(incl grt)
PLTKFLMA	PLTKFL	PALATKA	4	\$8.40	\$22.90	\$3.50	\$42.50
PMBHFLCS	PMBHFL	POMPANO BEACH	12	\$10.65	\$29.10	\$3.50	\$27.44
PMBHFLFE	PMBHFL	POMPANO BEACH	12	\$10.65	\$29.10	\$3.50	\$30.82
PMBHFLMA	PMBHFL	POMPANO BEACH	12	\$10.65	\$29.10	\$3.50	\$28.93
PMBHFLTA	PMBHFL	POMPANO BEACH	12	\$10.65	\$29.10	\$3.50	\$29.43
PMPKFLMA	PMPKFL	POMONA PARK	4	\$8.40	\$22.90	\$3.50	\$57.87
PNCYFLCA	PNCYFL	PANAMA CITY	5	\$8.80	\$23.85	\$3.50	\$39.18
PNCYFLMA	PNCYFL	PANAMA CITY	5	\$8.80	\$23.85	\$3.50	\$35.17
PNSCFLBL	PNSCFL	PENSACOLA	7	\$9.50	\$25.75	\$3.50	\$32.98
PNSCFLFP	PNSCFL	PENSACOLA	7	\$9.50	\$25.75	\$3.50	\$31.93
PNSCFLHC	PNSCFL	PENSACOLA	7	\$9.50	\$25.75	\$3.50	\$36.57
PNSCFLPB	PNSCFL	PENSACOLA	7	\$9.50	\$25.75	\$3.50	\$36.51
PNSCFLWA	PNSCFL	PENSACOLA	7	\$9.50	\$25.75	\$3.50	\$34.57
PNVDFLMA	PNVDFL	PONTE VEDRA BEACH	9	\$10.05	\$27.40	\$3.50	\$30.56
PRRNFLMA	PRRNFL	PERRINE	12	\$10.85	\$29.10	\$3.50	\$34.75
PRSNFLFD	PRSNFL	PIERSON	4	\$8.40	\$22.90	\$3.50	\$64.07
PTSLFLMA	PTSLFL	PORT ST. LUCIE	6	\$9.15	\$24.90	\$3.50	\$36.01
PTSLFLSO	PTSLFL	PORT ST. LUCIE	6	\$9.15	\$24.90	\$3.50	\$32.74
SBSTFLFE	SBSTFL	SEBASTIAN	6	\$9.15	\$24.90	\$3.50	\$55.31
SBSTFLMA	SBSTFL	SEBASTIAN	6	\$9.15	\$24.90	\$3.50	\$38.74
SGKYFLMA	SGKYFL	SUGARLOAF KEY	4	\$8.40	\$22.90	\$3.50	\$40.76
SNFRFLMA	SNFRFL	SANFORD	8	\$9.80	\$26.60	\$3.50	\$34.03
STAGFLBS	STAGFL	ST AUGUSTINE	4	\$8.40	\$22.90	\$3.50	\$31.68
STAGFLMA	STAGFL	ST AUGUSTINE	4	\$8.40	\$22.90	\$3.50	\$33.45
STAGFLSH	STAGFL	ST AUGUSTINE	4	\$8.40	\$22.90	\$3.50	\$41.17
STAGFLWG	STAGFL	ST AUGUSTINE	4	\$8.40	\$22.90	\$3.50	\$149.36
STRTFLMA	STRTFL	STUART	X2	\$11.00	\$29.81	\$3.50	\$32.97
SYHSFLCC	SYHSFL	SUNNY HILLS	3	\$8.10	\$21.90	\$3.50	\$88.12
TRENFLMA	TRENFL	TRENTON	5	\$8.80	\$23.85	\$3.50	\$60.57
TTVLFLMA	TTVLFL	TITUSVILLE	5	\$8.80	\$23.85	\$3.50	\$35.87
VERNFLMA	VERNFL	VERNON	3	\$8.10	\$21.90	\$3.50	\$86.27
VRBHFLBE	VRBHFL	VERO BEACH	5	\$8.80	\$23.85	\$3.50	\$31.28
VRBHFLMA	VRBHFL	VERO BEACH	5	\$8.80	\$23.85	\$3.50	\$34.14
WELKFLMA	WELKFL	WELAKA	4	\$8.40	\$22.90	\$3.50	\$63.33
WPBHFLAN	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$26.81
WPBHFLGA	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$31.88
WPBHFLGR	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$29.23
WPBHFLHH	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$29.18
WPBHFLLE	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$32.73
WPBHFLRB	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$31.54
WPBHFLRP	WPBHFL	WEST PALM BEACH	10	\$10.35	\$28.00	\$3.50	\$34.99
WWSPFLHI	WWSPFL	WEEKWACHEE SPRINGS	5	\$8.80	\$23.85	\$3.50	\$41.41
WWSPFLSH	WWSPFL	WEEKWACHEE SPRINGS	5	\$8.80	\$23.85	\$3.50	\$38.88
YNFNFLMA	YNFNFL	YOUNGSTOWN FOUNTAIN	5	\$8.80	\$23.85	\$3.50	\$71.20
YNTWFLMA	YNTWFL	YANKEETOWN	4	\$8.40	\$22.90	\$3.50	\$61.68
YULEFLMA	YULEFL	YULEE	9	\$10.05	\$27.40	\$3.50	\$44.01
	198			\$10.07	\$27.30	\$3.50	\$32.40