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September 24, 1998

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

RECORDING
SEP 24 11:25
FPSC

Dear Mrs. Bayo:

Re: Special Project No. 980000A-SP

You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Comments regarding the Fair and Reasonable Rate Study.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Tracy Hatch

TH/mr
Enclosures
cc: Parties of Record

- ACK
- AFA
- APP
- CAF
- CMB *Marsh*
- CTR
- EAG
- LEG
- LIN
- OPC
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10613 SEP 24 98

FPSC-RECORDS/REPORTING

✓

CERTIFICATE OF SERVICE
Special Project 980000A-SP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished
via U.S. Mail this 24th day of September, 1998 to the following persons:

DOCUMENT NUMBER - DATE
10613 SEP 24 88
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FAIR AND REASONABLE RATES
DOCKET NO. 980000A-SP
COMMENTS OF AT&T COMMUNICATIONS
OF THE SOUTHERN STATES, INC.

INTRODUCTION

As stated in the legislation that passed this past session, the Commission is to file a report with the Speaker of the House and the President of the Senate, stating its conclusions as to the fair and reasonable Florida residential basic local telecommunications service rate, considering affordability, the value of service, comparable residential basic local telecommunications rates in other states, and the cost of providing residential basic local telecommunications services in this state, including the proportionate share of joint and common costs. In these comments, AT&T is providing information to this Commission on what it believes is the cost to the major ILECs of providing residential basic local telecommunications service in this state. Last, AT&T is providing information as to the current cost and mark-up over cost of access service in this state, as charged by the ILECs.

COST OF RESIDENTIAL BASIC LOCAL TELECOMMUNICATIONS SERVICE

AT&T has looked at the issue of what it costs ILECs to provide residential basic local telecommunications service, and has used what it filed in the Universal Service Fund proceeding to determine cost. AT&T filed the HAI model and cost studies in Docket No. 980696-TP, which is the proceeding opened to determine the cost of basic local telecommunications service in order to determine if any explicit universal service support is warranted for any of the ILECs operating in Florida.

COST OF SERVICE USING THE HAI MODEL

AT&T and WorldCom/MCI are jointly sponsoring the use of the HAI model, in order to determine the cost of providing basic local telecommunications service to customers in Florida. The model and cost studies have previously been filed in docket No. 980696-TP. The HAI model is a computer model that provides an accurate and reliable means of determining the economic cost of providing basic local telecommunications service specific to discreet geographic areas within the state. The forward-looking economic costs are calculated based on Total Service Long run Incremental Cost principles, and use a consistent set of assumptions, procedures and input data. The model constructs a "bottom up" estimate of the pertinent costs based upon detailed data describing demand quantities, network component prices, operational costs, network operations costs, and other factors affecting the costs of providing basic local telecommunications service.

FAIR AND REASONABLE RATES
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OF THE SOUTHERN STATES, INC.

The cost studies performed by AT&T and MCI include all costs associated with providing residential basic local telecommunications service. Included in the statewide company average numbers are the costs for the basic line and dial tone, the cost to call local customers within the local calling area, the cost of providing vertical features, the cost to provide intraLATA toll service, the cost to provide interLATA toll service, both for intrastate and interstate, white page listing, the cost to provide directory assistance and operator assistance, and the cost to provide emergency 911 service.

The results of the cost studies produced by the HAI model are detailed by wire center in Attachment A to these comments. Using the cost studies that result from running the HAI model using inputs recommended by AT&T and MCI, the statewide company cost for each of the four major ILECs operating in Florida is as follows:

- | | |
|-----------------|---------|
| • BellSouth | \$15.43 |
| • GTE | \$15.37 |
| • Sprint-United | \$19.08 |
| • Sprint-Centel | \$26.87 |

COST TO PROVIDE SWITCHED ACCESS SERVICE

One last issue concerning the cost to provide residential basic local telecommunications service is the cost to provide switched access service. As this Commission is well aware, the ILECs have asserted for years that switched access charges must be priced with a large mark-up over cost in order to support their efforts to provide residential basic local telecommunications service. A review of implicit subsidies would not be complete without evaluating the subsidy provided by switched access charges. This assertion will be addressed next year, as a result of the efforts of this Commission and the Florida Legislature. In order to put the issue in perspective, AT&T below provides the current prices for switched access in this state, and the cost to provide such service. The cost figures that AT&T has used are the numbers presented by the ILECs to the Legislature in past years.

FAIR AND REASONABLE RATES
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<u>ILEC</u>	<u>Price per MOU</u> <u>(ORIG + TERM)</u>	<u>Cost per MOU</u> <u>(ORIG + TERM)</u>	<u>MARK-UP</u> <u>(ORIG + TERM)</u>
BellSouth	\$0.049	\$0.004	1125%
GTE	\$0.096	\$0.004	2300%
Sprint-United	\$0.100	\$0.004	2400%
Sprint-Centel	\$0.100	\$0.004	2400%

As these numbers show, the mark-up on this critical service is extremely high, and should be eliminated with the final determination of whether any explicit universal service support mechanism is warranted for these companies. AT&T believes that there no longer is any justification for charging these level of prices.

BELLSOUTH

ATTACHMENT 1
AT&T COMMENTS
DOCKET NO. 960000A-SP

WIRE CENTERS(citi)	Number of Lines	Residence cost per line	Cost per Wire Center
ARCHFLMA	2,380	\$ 42.16	\$ 1,204,322
BCRTFLBT	10,546	\$ 12.48	\$ 1,579,705
BCRTFLMA	39,057	\$ 12.53	\$ 5,874,703
BCRTFLSA	45,403	\$ 14.17	\$ 7,717,616
BGPIFLMA	3,236	\$ 32.31	\$ 1,254,714
BKVLFLJF	19,514	\$ 24.67	\$ 5,775,994
BLDWFLMA	1,385	\$ 38.75	\$ 644,015
BLGLFLMA	6,374	\$ 20.48	\$ 1,566,293
BNNFLMA	3,221	\$ 43.59	\$ 1,684,618
BRSNFLMA	2,015	\$ 51.24	\$ 1,238,843
BYBHFLMA	46,532	\$ 14.30	\$ 7,986,993
CCBHFLAF	0	\$ 22.73	\$ -
CCBHFLMA	13,999	\$ 12.98	\$ 2,180,594
CDKYFLMA	586	\$ 79.48	\$ 558,646
CFLDFLMA	3,962	\$ 48.43	\$ 2,207,449
CHPLFLJA	4,296	\$ 37.47	\$ 1,931,372
CNTMFLLE	6,297	\$ 24.85	\$ 1,877,621
COCOFLMA	36,653	\$ 17.31	\$ 7,613,550
COCOFLME	17,280	\$ 16.39	\$ 3,397,617
CSCYFLBA	1,896	\$ 72.77	\$ 1,480,977
DBRYFLDL	12,899	\$ 17.21	\$ 2,664,127
DBRYFLMA	5,840	\$ 18.83	\$ 1,319,637
DELDFLMA	19,782	\$ 17.25	\$ 4,094,538
DLBHFLMA	32,177	\$ 12.91	\$ 4,985,838
DLBHFLMA	25,985	\$ 12.31	\$ 3,839,757
DLSPFLMA	2,179	\$ 27.64	\$ 722,546
DNLNFLWM	6,507	\$ 34.61	\$ 3,533,127
DRBHFLMA	34,960	\$ 13.12	\$ 5,503,759
DYBHFLFN	1,484	\$ 14.48	\$ 257,901
DYBHFLMA	28,837	\$ 13.62	\$ 4,713,694
DYBHFLOB	25,732	\$ 16.98	\$ 5,242,918
DYBHFLOS	6,980	\$ 14.96	\$ 1,253,315
DYBHFLPO	42,643	\$ 14.92	\$ 7,633,301
EGLLFLBG	33,002	\$ 14.90	\$ 5,900,187
EGLLFLIH	16,939	\$ 13.69	\$ 2,782,730
EORNFLMA	4,521	\$ 31.92	\$ 1,731,496
FLBHFLMA	3,078	\$ 23.80	\$ 878,863
FRBHFLFP	11,226	\$ 19.38	\$ 2,611,177
FTGRFLMA	426	\$ 63.28	\$ 323,557
FTLDFLCR	28,933	\$ 11.44	\$ 3,972,898
FTLDFLCY	22,142	\$ 11.03	\$ 2,931,956
FTLDFLJA	46,666	\$ 13.60	\$ 7,618,314
FTLDFLMR	43,563	\$ 11.99	\$ 6,269,417
FTLDFLQA	47,083	\$ 12.10	\$ 6,836,753
FTLDFLPL	40,057	\$ 13.10	\$ 6,298,977
FTLDFLSG	568	\$ 12.72	\$ 86,734
FTLDFLSU	37,443	\$ 12.23	\$ 5,494,571
FTLDFLWN	10,409	\$ 15.16	\$ 1,893,134

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FTPRFLMA	39,982 \$	18.54	\$ 8,894,956
GCSPFLCN	6,059 \$	28.82	\$ 2,095,334
GCVLFLMA	2,797 \$	53.93	\$ 1,810,283
GENVFLMA	1,840 \$	41.33	\$ 912,570
GLBRFLMC	13,066 \$	18.29	\$ 2,868,130
GSVLFLMA	59,765 \$	16.13	\$ 11,566,693
GSVLFLNW	8,349 \$	15.99	\$ 1,601,770
HAVNFLMA	4,323 \$	40.71	\$ 2,111,810
HBSDFLMA	7,443 \$	19.55	\$ 1,746,449
HLNVFLMA	7,792 \$	27.53	\$ 2,573,871
HLWDFLHA	18,260 \$	10.96	\$ 2,400,980
HLWDFLMA	33,462 \$	12.16	\$ 4,883,410
HLWDFLPE	65,573 \$	13.83	\$ 10,882,538
HLWDFLWH	64,701 \$	13.07	\$ 10,149,696
HMSTFLHM	21,584 \$	19.05	\$ 4,933,315
HMSTFLNA	5,230 \$	20.52	\$ 1,287,811
HTISFLMA	8,254 \$	16.44	\$ 1,628,031
HWTHFLMA	3,720 \$	48.13	\$ 2,148,674
ISLMFLMA	1,883 \$	24.46	\$ 552,665
JAY FLMA	2,379 \$	59.54	\$ 1,699,638
JCBHFLAB	8,773 \$	17.06	\$ 1,795,996
JCBHFLMA	23,327 \$	14.03	\$ 3,926,467
JCBHFLC	3,152 \$	18.60	\$ 703,586
JCVLFLAR	20,187 \$	13.61	\$ 3,296,382
JCVLFLBW	23,620 \$	15.71	\$ 4,452,033
JCVLFLCL	20,521 \$	11.63	\$ 2,863,592
JCVLFLFC	15,902 \$	13.37	\$ 2,550,715
JCVLFLIA	204 \$	23.12	\$ 56,594
JCVLFLJT	70 \$	9.00	\$ 7,553
JCVLFLLF	27,882 \$	17.09	\$ 5,717,403
JCVLFLNO	22,172 \$	16.00	\$ 4,257,605
JCVLFLOW	12,834 \$	19.50	\$ 3,003,332
JCVLFLRV	22,753 \$	13.34	\$ 3,642,454
JCVLFLSJ	29,239 \$	12.72	\$ 4,462,538
JCVLFLSM	10,743 \$	11.39	\$ 1,468,032
JCVLFLWC	30,340 \$	15.74	\$ 5,731,844
JPTRFLMA	31,890 \$	14.65	\$ 5,606,775
KYHGFLMA	4,772 \$	32.35	\$ 1,852,671
KYLRFLLS	4,549 \$	17.54	\$ 957,232
KYLRFLMA	5,029 \$	19.56	\$ 1,180,212
KYWSFLMA	16,445 \$	14.22	\$ 2,806,106
LKCYFLMA	16,036 \$	31.87	\$ 6,133,635
LKMRFLMA	3,758 \$	16.25	\$ 732,556
LYHNFLOH	9,269 \$	21.02	\$ 2,338,367
MCNPFLMA	1,419 \$	62.39	\$ 1,062,348
MDBGFLPM	10,572 \$	27.95	\$ 3,545,601
MIAMFLAE	37,639 \$	10.82	\$ 4,888,914
MIAMFLAL	19,923 \$	11.62	\$ 2,779,289
MIAMFLAP	1,357 \$	13.34	\$ 217,222
MIAMFLBA	21,865 \$	11.06	\$ 2,902,495

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MIAMFLBC	8,920 \$	10.62 \$	1,136,593
MIAMFLBR	29,722 \$	9.42 \$	3,359,055
MIAMFLCA	73,555 \$	13.91 \$	12,275,094
MIAMFLFL	23,122 \$	10.53 \$	2,922,784
MIAMFLGR	7,037 \$	8.13 \$	886,680
MIAMFLHL	75,407 \$	13.05 \$	11,806,239
MIAMFLIC	28,397 \$	11.70 \$	3,988,056
MIAMFLKE	5,102 \$	11.06 \$	677,327
MIAMFLME	11,558 \$	10.57 \$	1,466,466
MIAMFLNM	20,791 \$	11.03 \$	2,752,892
MIAMFLNS	22,518 \$	12.17 \$	3,288,548
MIAMFLOL	21,804 \$	12.82 \$	3,353,335
MIAMFLPB	22,070 \$	11.65 \$	3,084,863
MIAMFLPL	4,307 \$	11.14 \$	575,707
MIAMFLRR	30,431 \$	12.90 \$	4,711,985
MIAMFLSH	28,807 \$	11.66 \$	4,028,963
MIAMFLSO	41,072 \$	12.66 \$	6,241,665
MIAMFLWD	44,124 \$	12.13 \$	6,420,946
MIAMFLWM	22,773 \$	11.32 \$	3,094,486
MICCFLLB	2,140 \$	25.86 \$	664,194
MLBRFLMA	63,906 \$	16.84 \$	12,912,024
MLTNFLRA	14,701 \$	23.43 \$	4,132,648
MNDRFLAV	4,527 \$	11.42 \$	620,326
MNDRFLLO	27,168 \$	14.93 \$	4,865,794
MNDRFLW	3,498 \$	25.36 \$	1,064,425
MNSNFLMA	428 \$	124.80 \$	640,747
MRTHFLVE	6,729 \$	21.11 \$	1,704,309
MXVFLMA	1,547 \$	48.13 \$	893,585
NDADFLAC	32,764 \$	11.63 \$	4,650,135
NDADFLBR	29,778 \$	13.32 \$	4,760,132
NDADFLGG	23,544 \$	11.72 \$	3,312,281
NDADFLLO	20,867 \$	10.98 \$	2,749,969
NKLRFLMA	895 \$	27.45 \$	294,953
NSBHFLMA	28,021 \$	17.74 \$	5,966,453
NWBYFLMA	2,511 \$	44.15 \$	1,330,196
OKHLFLMA	2,034 \$	46.11 \$	1,125,358
OLTWFLLN	2,376 \$	61.34 \$	1,748,801
ORLDFLAP	68,171 \$	15.49 \$	12,673,653
ORLDFLCL	20,974 \$	12.56 \$	3,160,585
ORLDFLMA	23,920 \$	11.20 \$	3,215,034
ORLDFLPC	38,456 \$	14.13 \$	6,519,438
ORLDFLPH	65,627 \$	14.35 \$	11,301,025
ORLDFLSA	18,460 \$	14.45 \$	3,201,504
ORPKFLMA	18,362 \$	15.62 \$	3,442,713
ORPKFLRW	12,592 \$	15.44 \$	2,332,597
OVIDFLCA	17,378 \$	19.45 \$	4,056,529
PACEFLPV	9,346 \$	24.92 \$	2,794,505
PAHKFLMA	2,606 \$	22.14 \$	692,449
PCBHFLNT	15,705 \$	16.98 \$	3,200,709
PLCSFLMA	12,725 \$	17.56 \$	2,681,862

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DOCKET NO. 960000A-SP

PLTKFLMA	13,790 \$	26.31 \$	4,354,328
PMBHFLCS	42,588 \$	12.87 \$	6,578,106
PMBHFLFE	48,335 \$	12.54 \$	7,270,659
PMBHFLMA	55,391 \$	12.66 \$	8,413,929
PMBHFLTA	31,684 \$	12.30 \$	4,675,292
PMPKFLMA	2,253 \$	41.29 \$	1,116,021
PNCYFLCA	7,348 \$	20.28 \$	1,788,660
PNCYFLMA	31,170 \$	14.76 \$	5,520,432
PNSCFLBL	26,874 \$	12.91 \$	4,164,457
PNSCFLFP	36,099 \$	15.03 \$	6,508,818
PNSCFLHC	7,688 \$	21.95 \$	2,024,988
PNSCFLPB	4,670 \$	25.62 \$	1,435,721
PNSCFLWA	28,777 \$	16.76 \$	5,786,162
PNVDFLMA	11,576 \$	17.62 \$	2,447,266
PRRNFLMA	54,279 \$	15.63 \$	10,181,946
PRSNFLFD	1,755 \$	50.48 \$	1,063,072
PTSLFLMA	27,055 \$	18.28 \$	5,934,926
PTSLFLSO	10,343 \$	15.75 \$	1,955,069
SBSTFLFE	876 \$	55.86 \$	586,886
SBSTFLMA	10,650 \$	20.24 \$	2,567,091
SGKYFLMA	2,453 \$	33.68 \$	991,331
SNFRFLMA	35,518 \$	17.32 \$	7,380,593
STAGFLBS	6,364 \$	18.04 \$	1,377,921
STAGFLMA	14,808 \$	20.53 \$	3,648,835
STAGFLSH	9,170 \$	19.37 \$	2,132,054
STRTFLMA	34,581 \$	17.09 \$	7,093,301
SYHSFLCC	1,024 \$	100.77 \$	1,237,764
TRENFLMA	3,382 \$	48.58 \$	1,971,756
TTVFLMA	27,739 \$	17.44 \$	5,805,358
VERNFLMA	1,608 \$	74.76 \$	1,442,332
VRBHLBE	8,596 \$	15.55 \$	1,803,856
VRBHLMA	32,091 \$	16.57 \$	6,381,888
WELKFLMA	2,243 \$	42.98 \$	1,156,806
WPBHFLAN	16,805 \$	10.88 \$	2,194,500
WPBHFLGA	72,464 \$	14.41 \$	12,534,533
WPBHFLGR	37,578 \$	14.50 \$	6,537,613
WPBHFLHH	48,116 \$	13.22 \$	7,318,579
WPBHFLLE	34,172 \$	12.47 \$	5,115,367
WPBHFLRB	28,056 \$	12.92 \$	4,350,923
WPBHFLRP	31,712 \$	19.35 \$	7,364,439
WWSPFLHI	12,365 \$	20.82 \$	3,088,579
WWSPFLSH	30,038 \$	17.50 \$	6,307,128
YNFNFLMA	2,111 \$	58.43 \$	1,479,859
YNTWFLMA	1,820 \$	60.17 \$	1,314,258
YULEFLMA	2,843 \$	35.52 \$	1,212,127

3,753,346

\$ 694,875,298

Average cost per line

\$ 15.43

WIRE CENTERS(ciii)	Number of Lines	Residence cost per line	Cost per Wire Center
ABDFLXA	10,444	\$ 16.88	\$ 2,115,544
FAFLXA	11,462	\$ 21.56	\$ 2,965,200
ALTRFLXA	1,634	\$ 47.66	\$ 934,653
ANMRFLXA	4,991	\$ 15.23	\$ 912,336
BARTFLXA	7,640	\$ 16.65	\$ 1,527,936
BAYUFLXA	25,799	\$ 12.66	\$ 3,919,416
BBPKFLXA	2,386	\$ 29.92	\$ 856,659
BHPKFLXA	5,183	\$ 10.04	\$ 624,194
BRBAFLXA	38,632	\$ 14.77	\$ 6,846,795
BRJTFLXA	512	\$ 64.98	\$ 399,538
BRNDFLXA	44,480	\$ 16.31	\$ 8,706,690
BRTNFLXX	23,466	\$ 14.79	\$ 4,164,585
BYSHFLXA	447	\$ 23.92	\$ 128,196
CLWRFLXA	31,004	\$ 12.60	\$ 4,688,481
CNSDFLXA	35,321	\$ 13.33	\$ 5,651,823
CRWDFLXA	42,085	\$ 14.35	\$ 7,249,500
CYGRFLXA	9,284	\$ 18.50	\$ 2,060,917
DNDNFLXA	19,857	\$ 13.55	\$ 3,227,597
DUNDFLXA	4,555	\$ 28.93	\$ 1,580,904
ENWDFLXA	16,982	\$ 16.97	\$ 3,459,237
FHSDFLXA	5,376	\$ 11.01	\$ 710,245
FRSTFLXA	3,288	\$ 31.23	\$ 1,232,174
GNDYFLXA	16,883	\$ 12.38	\$ 2,508,260
HDSNFLXA	33,140	\$ 16.19	\$ 6,440,208
HGLDFLXA	22,100	\$ 17.34	\$ 4,598,832
HNCYFLXA	9,256	\$ 21.67	\$ 2,406,584
HNCYFLXN	3,134	\$ 34.63	\$ 1,302,194
HYPKFLXA	12,388	\$ 11.19	\$ 1,663,568
INLKFLXA	801	\$ 59.63	\$ 573,107
INRKFLXX	15,995	\$ 12.61	\$ 2,420,805
KYSTFLXA	8,219	\$ 23.09	\$ 2,277,000
LGBKFLXA	4,563	\$ 16.66	\$ 912,361
LKALFLXA	2,751	\$ 20.73	\$ 684,459
LKLDFLXA	27,549	\$ 14.01	\$ 4,632,200
LKLDFLXE	12,203	\$ 16.83	\$ 2,464,251
LKLDFLXN	20,144	\$ 20.74	\$ 5,012,206
LKWLFLXA	8,269	\$ 18.89	\$ 1,874,553
LKWLFLXE	3,539	\$ 36.10	\$ 1,532,836
LLMNFLXA	34,313	\$ 13.07	\$ 5,382,713
LNLKFLXA	5,629	\$ 25.33	\$ 1,710,972
LRGOFLXA	28,661	\$ 12.82	\$ 4,407,693
LUTZFLXA	8,283	\$ 21.35	\$ 2,122,303
MLBYFLXA	4,521	\$ 21.24	\$ 1,152,411
MNLKFLXA	5,743	\$ 22.63	\$ 1,559,759
MYCYFLXA	668	\$ 67.34	\$ 910,010
NOBHFLXA	37,315	\$ 13.96	\$ 6,249,728

GTE

ATTACHMENT 1
AT&T COMMENTS
DOCKET NO. 980000A-SP

NPRCFLXA	39,170 \$	15.41 \$	7,244,471
NRPTFLXA	13,269 \$	18.59 \$	2,959,203
NRSDFLXA	16,731 \$	14.51 \$	2,913,149
OLDSFLXA	7,472 \$	15.48 \$	1,387,610
OSPRFLXA	5,384 \$	18.45 \$	1,192,307
PKCYFLXA	2,540 \$	38.05 \$	1,159,455
PLMTFLXA	16,579 \$	17.12 \$	3,406,187
PLSLFLXA	20,586 \$	15.43 \$	3,812,832
PNCRFLXA	3,370 \$	32.17 \$	1,301,165
PNLSFLXA	31,532 \$	12.61 \$	4,770,864
POINFLXA	1,457 \$	41.27 \$	721,397
PRSHFLXA	1,687 \$	65.55 \$	1,326,832
PSDNFLXA	25,231 \$	13.32 \$	4,034,061
PTCYFLXA	21,139 \$	19.63 \$	4,978,896
RSKNFLXA	10,528 \$	19.17 \$	2,421,209
SARKFLXA	1,851 \$	12.79 \$	284,032
SEKYFLXA	8,786 \$	13.28 \$	1,400,155
SGBEFLXA	10,765 \$	12.72 \$	1,643,598
SKWYFLXA	19,614 \$	12.68 \$	2,914,954
SLSPFLXA	25,653 \$	13.20 \$	4,064,867
SMNLFLXA	15,297 \$	12.57 \$	2,307,059
SNSPFLXA	12,533 \$	16.79 \$	2,525,501
SPBGFLXA	28,024 \$	11.81 \$	3,688,796
SPBGFLXS	17,150 \$	13.67 \$	2,814,126
SPRGFLXA	21,999 \$	15.64 \$	4,128,495
SRSTFLXA	24,464 \$	11.69 \$	3,431,366
SSDSFLXA	30,864 \$	14.91 \$	5,523,104
STGRFLXA	35,301 \$	13.43 \$	5,687,489
SWTHFLXA	29,961 \$	12.82 \$	4,610,897
TAMPFLXE	15,406 \$	13.84 \$	2,557,733
TAMPFLXX	6,715 \$	9.10 \$	733,367
THINTFLXA	4,980 \$	24.98 \$	1,492,508
TMTRFLXA	26,601 \$	13.00 \$	4,149,623
TRSPFLXA	32,361 \$	14.78 \$	5,740,304
UNVRFLXA	21,230 \$	12.57 \$	3,203,550
VENCFLXA	21,015 \$	14.96 \$	3,771,899
VENCFLXS	17,181 \$	15.27 \$	3,147,600
WIMMFLXA	9,187 \$	23.84 \$	2,627,801
WLCHFLXA	7,819 \$	24.35 \$	2,284,359
WLCRFLXA	31,390 \$	12.92 \$	4,867,560
WNHNFLXC	23,630 \$	15.86 \$	4,497,437
WSSDFLXA	18,889 \$	11.78 \$	2,670,271
YBCTFLXA	6,051 \$	12.54 \$	910,868

1,410,485	\$ 260,140,688
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Average cost per line	\$ 15.37
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SPRINT - UNITED

ATTACHMENT 1
 AT&T COMMENTS
 DOCKET 980000A-SP

WIRE CENTERS(ciii)	Number of Lines	Residence cost per line	Cost per Wire Center
ALSPFLXA	30,605	\$ 13.01	\$ 4,777,622.86
ALVAFLXA	887	\$ 27.27	\$ 290,296.83
APPKFLXA	22,389	\$ 17.05	\$ 4,580,593.40
ARCDFLXA	8,465	\$ 30.04	\$ 3,051,312.89
ASTRFLXA	683	\$ 45.71	\$ 484,662.30
AVPKFLXA	8,153	\$ 22.03	\$ 2,155,402.43
BCGRFLXA	378	\$ 48.70	\$ 221,163.27
BLVWFLXA	15,777	\$ 24.95	\$ 4,723,200.60
BNSPFLXA	19,580	\$ 19.16	\$ 4,501,024.82
BSHNFLXA	5,812	\$ 41.77	\$ 2,912,919.93
BVHLFLXA	9,177	\$ 21.07	\$ 2,319,787.99
BWLGFLXA	1,085	\$ 47.53	\$ 618,714.50
CHSWFLXA	3,057	\$ 25.44	\$ 933,025.92
CLMTFLXA	7,844	\$ 23.09	\$ 2,173,180.58
CLTNFLXA	4,803	\$ 25.38	\$ 1,462,509.42
CPCRFLXA	21,735	\$ 14.14	\$ 3,688,050.26
CPCRFLXB	17,584	\$ 16.09	\$ 3,396,178.55
CPHZFLXA	7,713	\$ 22.30	\$ 2,063,645.43
CRRVFLXA	9,454	\$ 21.85	\$ 2,478,800.38
CSLBFLXA	16,913	\$ 14.10	\$ 2,861,099.99
CYLKFLXA	21,472	\$ 14.28	\$ 3,678,168.63
CYLKFLXB	4,528	\$ 18.42	\$ 1,000,805.81
DDCYFLXA	8,375	\$ 21.99	\$ 2,209,896.66
ESTSFLXA	10,727	\$ 17.82	\$ 2,294,185.85
EVRGFLXA	597	\$ 171.71	\$ 1,229,697.23
FTMBFLXA	8,108	\$ 13.11	\$ 1,275,410.44
FTMDFLXA	2,475	\$ 32.67	\$ 970,315.74
FTMYFLXA	11,061	\$ 11.30	\$ 1,499,482.05
FTMYFLXB	12,157	\$ 18.03	\$ 2,630,852.28
FTMYFLXC	18,381	\$ 12.35	\$ 2,724,993.30
GLGCFLXA	16,198	\$ 20.27	\$ 3,939,435.88
GLRDFLXA	33,213	\$ 13.25	\$ 5,279,311.01
GVLDFLXA	3,545	\$ 32.91	\$ 1,399,992.51
HMSPLXA	7,108	\$ 23.17	\$ 1,976,763.32
HOWYFLXA	1,286	\$ 34.53	\$ 533,011.07
IMKLFLXA	3,683	\$ 28.07	\$ 1,240,471.14
INVRFLXA	21,682	\$ 23.01	\$ 5,987,385.81
IONAFLXA	10,628	\$ 14.06	\$ 1,792,954.02
KNVFLXA	277	\$ 195.19	\$ 647,654.72
KSSMFLXA	27,814	\$ 16.24	\$ 5,419,763.24
KSSMFLXB	8,893	\$ 16.26	\$ 1,948,056.21
KSSMFLXD	9,481	\$ 15.82	\$ 1,799,266.55
LBLLFLXA	4,798	\$ 44.36	\$ 2,554,049.83
LDLKFLXA	13,346	\$ 18.71	\$ 2,996,369.59
LHACFLXA	13,420	\$ 19.26	\$ 3,101,752.93
LKBRFLXA	27,740	\$ 12.33	\$ 4,103,016.36

SPRINT - UNITED

ATTACHMENT 1
AT&T COMMENTS
DOCKET 980000A-SP

LKHLFLXA	1,231 \$	30.23 \$	446,524.66
LKPCFLXA	8,391 \$	29.94 \$	3,015,309.21
LSBGFLXA	24,959 \$	17.35 \$	5,195,788.52
MOISFLXA	12,027 \$	14.03 \$	2,024,946.54
MRDCFLXA	654 \$	14.20 \$	111,481.95
MRHNFLXA	1,128 \$	57.05 \$	772,067.46
MTDRFLXA	10,678 \$	21.03 \$	2,694,183.02
MTLDFLTC	58 \$	14.42 \$	9,974.86
MTVRFLXA	948 \$	31.58 \$	359,176.72
NFMYFLXA	14,588 \$	14.23 \$	2,491,392.52
NFMYFLXB	13,623 \$	18.77 \$	3,067,652.16
NNPLFLXA	22,329 \$	14.89 \$	3,988,548.39
NPLSFLXC	24,444 \$	18.00 \$	5,279,494.03
NPLSFLXD	29,869 \$	13.55 \$	4,857,081.01
OCALFLXA	32,904 \$	17.01 \$	6,717,050.83
OCALFLXB	15,693 \$	21.17 \$	3,985,766.48
OCALFLXC	5,707 \$	16.97 \$	1,162,267.01
OCALFLXJ	3,504 \$	14.97 \$	629,622.47
OCNFFLXA	4,648 \$	35.11 \$	1,953,158.58
OKCBFLXA	12,479 \$	35.66 \$	5,340,522.85
OKLWFLXA	2,033 \$	30.08 \$	733,783.94
ORCYFLXA	8,126 \$	18.07 \$	1,567,248.20
ORCYFLXC	12,234 \$	16.60 \$	2,436,302.22
PNGRFLXA	16,103 \$	21.77 \$	4,206,114.66
PNISFLXA	5,748 \$	28.22 \$	1,946,622.76
PTCTFLXA	39,553 \$	16.11 \$	7,644,205.23
SBNGFLXA	18,406 \$	18.15 \$	4,008,673.23
SCPKFLXA	8,204 \$	18.21 \$	1,792,323.25
SLHLFLXA	3,562 \$	34.49 \$	1,473,940.28
SNANFLXA	1,807 \$	43.65 \$	946,566.41
SNISFLXA	5,848 \$	18.64 \$	1,307,810.31
SSPRFLXA	1,020 \$	48.65 \$	595,307.59
STCDFLXA	14,703 \$	23.47 \$	4,141,267.21
SVSPFLXA	4,420 \$	24.24 \$	1,285,587.06
SVSSFLXA	5,625 \$	18.91 \$	1,276,448.49
TLCHFLXA	3,008 \$	30.99 \$	1,118,684.90
TVRSFLXA	10,018 \$	17.48 \$	2,101,505.24
UMTLFLXA	3,582 \$	36.54 \$	2,886,319.84
WCHLFLXA	4,146 \$	37.00 \$	1,840,937.88
WLSTFLXA	3,983 \$	43.43 \$	2,075,834.80
WLWDFLXA	7,007 \$	25.36 \$	2,132,580.37
WNDRFLXA	4,637 \$	20.86 \$	1,160,900.87
WNGRFLXA	13,138 \$	16.68 \$	2,629,654.51
WNPKFLXA	22,066 \$	11.39 \$	3,016,199.85
ZLSPFLXA	1,180 \$	81.04 \$	1,147,462.85
TOTAL	976,303		\$ 223,505,531.81

SPRINT - UNITED

ATTACHMENT 1
AT&T COMMENTS
DOCKET 980000A-SP

Average cost per line

\$

19.08

SPRINT - CENTEL

ATTACHMENT 1
AT&T COMMENTS
DOCKET NO. 960000A-SP

WIRE CENTERS(cIII)	Number of Lines	Residence cost per line	Cost per Wire Center
ALFRFLXA	1,237	\$ 63.04	\$ 935,952.08
BAKRFLXA	1,980	\$ 69.26	\$ 1,645,896.33
BNFYFLXA	4,195	\$ 44.56	\$ 2,243,219.41
CFVLFL A	3,774	\$ 47.34	\$ 2,143,712.93
CHLKFLXA	1,365	\$ 86.39	\$ 1,414,847.97
CRVWFLXA	11,184	\$ 23.05	\$ 3,093,603.07
CTDLFLXA	928	\$ 71.67	\$ 798,105.30
DESTFLXA	5,842	\$ 15.26	\$ 1,069,698.75
DFSPFLXA	5,816	\$ 35.69	\$ 2,490,662.78
ELFDLFLXA	541	\$ 57.25	\$ 371,559.95
FRPTFLXA	1,890	\$ 69.60	\$ 1,578,246.95
FTWBFLXA	12,018	\$ 13.90	\$ 2,004,515.96
FTWBFLXB	14,167	\$ 14.48	\$ 2,461,896.07
FTWBFLXC	2,428	\$ 21.86	\$ 636,788.52
GDRGFLXA	1,188	\$ 60.74	\$ 865,595.54
GLDLFLXA	548	\$ 112.46	\$ 739,923.09
GNVFLXA	977	\$ 127.37	\$ 1,492,600.65
GNWDFLXA	1,106	\$ 85.06	\$ 1,129,353.48
HRFDLFLXA	247	\$ 50.11	\$ 148,531.88
KGLKFLXA	219	\$ 121.36	\$ 319,113.34
LEE FLXA	868	\$ 145.97	\$ 1,520,604.88
LWTYFLXA	1,095	\$ 82.91	\$ 1,089,561.43
MALNFLXA	954	\$ 72.23	\$ 827,043.33
MDSNFLXA	2,346	\$ 26.36	\$ 742,130.31
MNTIFLXA	4,198	\$ 56.64	\$ 2,853,033.37
MRNNFLXA	6,560	\$ 28.02	\$ 2,205,772.78
PANCFLXA	1,001	\$ 59.35	\$ 713,129.60
PNLNFLXA	845	\$ 97.96	\$ 993,781.79
RYHLFLXA	819	\$ 93.24	\$ 916,730.55
SGBHFLXA	979	\$ 56.69	\$ 665,797.91
SHLMFLXA	6,759	\$ 15.84	\$ 1,284,970.96
SNDSFLXA	1,407	\$ 51.68	\$ 872,663.85
SNRSFLXA	3,577	\$ 26.24	\$ 1,126,630.05
SPCPFLXA	684	\$ 101.27	\$ 831,338.61
STMKFLXA	364	\$ 93.35	\$ 407,591.65
STRKFLXA	4,913	\$ 30.46	\$ 1,795,795.78
TLHSFLXA	12,546	\$ 11.56	\$ 1,740,355.85
TLHSFLXB	14,065	\$ 15.66	\$ 2,643,037.43
TLHSFLXC	18,165	\$ 18.04	\$ 3,932,301.89
TLHSFLXD	25,688	\$ 17.12	\$ 5,272,660.10
TLHSFLXF	14,531	\$ 23.13	\$ 4,032,297.96
TLHSFLXG	3,436	\$ 36.43	\$ 1,502,393.65
TLHSFLXH	7,414	\$ 18.33	\$ 1,631,070.38
VLPRFLXA	13,343	\$ 18.93	\$ 3,030,602.69
WSTVFLXA	113	\$ 135.10	\$ 183,313.58

SPRINT - CENTEL

ATTACHMENT 1
AT&T COMMENTS
DOCKET NO. 980000A-SP

TOTAL	218,300	\$ 70,398,454.44
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Average cost per line		\$ 26.87
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