BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes.

DOCKET NO. 980696-TP ORDER NO. PSC-99-0835-FOF-TP ISSUED: April 26, 1999

The following Commissioners participated in the disposition of this matter:

JOE GARCIA, Chairman J. TERRY DEASON SUSAN F. CLARK JULIA L. JOHNSON E. LEON JACOBS, JR.

ORDER GRANTING MOTION TO STRIKE RESPONSE,
DENYING REQUEST FOR ORAL ARGUMENT, AND
DENYING MOTIONS FOR RECONSIDERATION

BY THE COMMISSION:

I. BACKGROUND

Section 364.025(4)(b), Florida Statutes, requires this Commission to determine and report to the Legislature the total forward-looking cost of providing basic local telecommunications services on a geographic basis no larger than a wire center, using a cost proxy model to be selected by us after notice and opportunity for hearing. As stated in the law, the purpose of this study is to assist the Legislature in establishing a permanent universal service mechanism. For small local exchange companies that serve fewer than 100,000 access lines, Section 364.025(4)(c), Florida Statutes, permits us to select a different proxy model or a fully distributed embedded cost allocation.

From October 12 through October 16, 1998, we conducted a formal administrative hearing according to the provisions of Chapter 120, Florida Statutes. Twenty parties intervened and participated in the proceeding. There were many issues addressed

at the hearing, including the fundamental issue of defining "basic local service" for the purpose of establishing a permanent universal service mechanism. The principal point of contention between the parties was which cost proxy model should we select for the three major incumbent local exchange companies (LECs): BellSouth Telecommunications, Inc. (BellSouth), GTE Florida, Inc. (GTEFL), and Sprint-Florida, Incorporated (Sprint). BellSouth, GTEFL, and Sprint either sponsored or supported the BCPM 3.1 cost proxy model. AT&T Communications of the Southern States, Inc. (AT&T) and MCI Telecommunications Corporation (MCI) sponsored the HAI 5.0a cost proxy model. Both models contain highly complex algorithms and require thousands of discrete input values. Proponents of both models argued that while neither model was perfect, their model was superior and best met the requirements of Section 364.025(a), Florida Statutes.

On January 7, 1999, we issued Order No. PSC-99-0068-FOF-TP in which we selected the BCPM 3.1 cost proxy model with modifications as the better model of the two proposed and also approved the many input values that are required to populate the model. This model is to be used for determining the cost of basic local telecommunications service for the three large LECs: BellSouth, GTEFL, and Sprint. For the small LECs, we approved the proposed embedded cost methodology with several modifications and the necessary input values.

On January 22, 1999, Sprint filed a Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP. Sprint's Motion addressed the limited issue of our decision to substitute a \$4,350 Loop Cost Investment Cap for the \$10,000 cap submitted as a default input in the BCPM 3.1. In conjunction with this filing, Sprint submitted a Request for Oral Argument on its Motion for Reconsideration. Also on that date, GTEFL filed its Petition for Reconsideration of Order No. PSC-99-0068-FOF-TP. GTEFL's Petition was limited to our approved model inputs for depreciation and cost of capital.

On February 2, 1999, AT&T, e.spire Communications, Inc. (e.spire), the Florida Competitive Carriers Association (FCCA), the Florida Cable Telecommunications Association (FCTA), MCI, and Worldcom Technologies, Inc. (Worldcom) (collectively, "Joint Respondents") filed their Joint Response to the Sprint and GTEFL Requests for Reconsideration, requesting that the Requests for Reconsideration be denied.

On February 3, 1999, GTEFL filed its Response in Support of Sprint-Florida's Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP. GTEFL supports Sprint in requesting that we reconsider our decision to apply a \$4,350 loop investment cap to all carriers in Florida. GTEFL urges adoption of the \$10,000 cap supported by Sprint and GTEFL during this proceeding.

On February 15, 1999, the Joint Respondents filed a Joint Response to GTEFL's Response in Support of Sprint's Motion for Reconsideration, requesting that we disregard GTEFL's response, or in the alternative, consider the response of the Joint Respondents as a substantive reply to GTEFL's response. On February 22, 1999, GTEFL filed a Motion to Strike the Joint Petitioners' Joint Response to GTEFL's Response in Support of Sprint's Motion for Reconsideration.

Set forth below are our decisions on Sprint and GTEFL's requests for reconsideration, Sprint's request for oral argument on its motion for reconsideration, and GTEFL's motion to strike the joint response to GTEFL's response in support of Sprint's motion for reconsideration.

II. GTE FLORIDA INCORPORATED'S MOTION TO STRIKE

As stated above, on February 3, 1999, GTEFL filed its Response in Support of Sprint-Florida's Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP. GTEFL filed its response in support of Sprint in requesting that the Commission reconsider its decision to apply a \$4,350 loop investment cap to all carriers in Florida. GTEFL urges adoption of the \$10,000 cap supported by Sprint and GTEFL during this proceeding.

On February 15, 1999, the Joint Respondents filed a Joint Response to GTEFL's Response in Support of Sprint's Motion for Reconsideration. The Joint Respondents contend that GTEFL's Response is a Second Petition for Reconsideration and not a response as would be proper under the Commission's rules. The Joint Respondents contend that GTEFL's filing contains an excessive amount of arguments and therefore moves beyond what is properly contained in a response. In the alternative, should the Commission consider GTEFL's response valid, the Joint Respondents ask that the Commission treat their response as a substantive reply to GTEFL's filing.

Finally, on February 22, 1999, GTEFL filed a Motion to Strike the Joint Respondents' Joint Response to GTEFL's Response in Support of Sprint's Motion for Reconsideration. GTEFL argues that the Joint Response is improper under the Commission's rules as a response to a response to a motion for reconsideration.

Upon review, we find that the parties have created their own procedural quagmire, which deserves little time and consideration. The parties are both walking on the edge of what is permissible motion and response practice under our procedural rules. GTEFL appears to have legitimately filed a response in support of Sprint's Motion for Reconsideration. The Joint Petitioners' argument that the response is too long to be a response is without merit.

There is question, however, whether GTEFL is truly responding or instead filing a second petition for reconsideration. Sprint's Motion for Reconsideration does ask that the \$4,350 loop cost investment cap be applied to BellSouth, and not GTEFL and Sprint. Therefore, any party to the proceeding, such as GTEFL, has a procedural right to respond in opposition or support of the motion. It simply happens that in this case, Sprint's motion for reconsideration, if granted, may benefit GTEFL. Accordingly, we shall not disregard GTEFL's response in support of Sprint's motion.

Based on that analysis, we will grant GTEFL's motion to strike the Joint Response to GTEFL's response to Sprint's Motion for Reconsideration. A response to a response to a motion for reconsideration is not contemplated by Commission Rule 25-22.060, Florida Administrative Code. This rule allows parties to file a response to a motion for reconsideration. GTEFL's response does "push the line" with respect to what is procedurally proper as a response but does not cross it in this case. The Joint Respondent's response to a response clearly crosses the line. Accordingly, we hereby grant GTEFL's Motion to Strike.

III. SPRINT-FLORIDA, INC.'S REQUEST FOR ORAL ARGUMENT

Consistent with Rule 25-22.060(1)(f), Florida Administrative Code, Sprint requests that the Commission permit a brief opportunity for the company to present oral argument in support of its motion for reconsideration. Sprint believes that oral argument is necessary for several reasons. First, Sprint was unaware that the loop investment cap was a disputed issue, or that the Commission might intend to apply the BellSouth study proposed value

to Sprint. Second, Sprint believes that the Commission may have been unaware of the material effect that this decision would have on the company due to the lack of notice and the late nature of the issue being raised. Finally, Sprint believes that the complexity of the issue and the limitations of written explanation necessitate discussion of the matter. No party responded to Sprint's request for oral argument.

Upon consideration, we believe that Sprint's Motion for Reconsideration and the resulting pleadings from other parties provide sufficient and clear information upon which we can make our decision on the motion for reconsideration. Accordingly, we hereby deny Sprint's request for oral argument.

IV. STANDARD OF REVIEW

The proper standard of review for a motion for reconsideration is whether the motion identifies some point of fact or law which was overlooked or which the Commission failed to consider in rendering its order. See Diamond Cab Co. v. King, 146 So. 2d 889 (Fla. 1962); Pingree v. Quaintance, 394 So. 2d 161 (Fla. 1st DCA 1981).

V. SPRINT-FLORIDA INCORPORATED'S MOTION FOR RECONSIDERATION

A. SPRINT'S MOTION FOR RECONSIDERATION

As indicated in the Background section of this Order, on January 22, 1999, Sprint filed its Motion for Reconsideration. Sprint specifically requested reconsideration of the Commission's decision to adopt the loop investment cap value proposed by BellSouth for all carriers required to use the BCPM 3.1 cost proxy model. BellSouth proposed a cap of \$4,350. Sprint contends that the Commission should have adopted the BCPM 3.1 default input value of \$10,000. Sprint contends that the issue was not in dispute, and Sprint had no opportunity to present evidence on the matter. Sprint notes that all parties, with the exception of BellSouth, supported the default value. Sprint also contends that MCI/AT&T witness Wells testified that the \$10,000 default value had been accepted in many proceedings, and that BellSouth provided no explanation or supporting documentation for the \$4,350 cap. Therefore, Sprint believes that the issue was essentially stipulated.

Sprint believes that the Commission misapprehended the nature of the evidence offered on this issue. Sprint claims that the Commission based its decision on testimony from a BellSouth witness pertaining to a survey that presumably gathered information from BellSouth's own territory. Sprint argues that there is no basis to support the notion that the geography of Sprint's service territory sufficiently similar to BellSouth's service territory. Furthermore, Sprint believes that there is no basis for the Commission's conclusion that BellSouth's cap value is Floridaspecific. These points are important when one looks at BellSouth's reasoning for its \$4,350 cap value. BellSouth used this value because its own survey, which was not provided as a part of the record, indicated that \$4,350 was a wireless crossover point whereby it would be more cost-effective to deploy wireless technology rather than wireline facilities when the loop investment would exceed this level. Sprint contends that the \$4,350 cap is not economically achievable in its territory. In conclusion, Sprint argues that the \$4,350 cap value should only be applied to BellSouth and not the other carriers, Sprint and GTEFL.

Finally, Sprint contends that the Commission may have been under the false impression that the number of affected lines was minimal for all LECs. Sprint bases this contention on the Commission's discussion at the Agenda Conference when the cap value issue was discussed. At one point, the Commission was advised by staff's revised recommendation on December 17, 1998, that Sprint had no lines above the \$10,000 default cap value. Sprint's subsequent compliance value indicated 8,987 lines above the \$10,000 cap value. More importantly, over 56,000 lines exceeded the \$4,350 cap. Sprint provides this information to show the material effect on the company. Sprint believes that the Commission could have been understandably confused about whether the existing \$10,000 cap was, in fact, actually capping loop cost investment at all.

B. JOINT RESPONSE

The Joint Respondents request that the Commission deny Sprint's motion for reconsideration. The Joint Respondents contend that Sprint's motion does not meet the standard of review for reconsideration. The Joint Respondents assert that Sprint fails to bring to our attention matters overlooked or not considered and simply attempts to reargue issues that we decided differently than advocated by Sprint. The Joint Respondents note that Sprint did not dispute the fact that BellSouth provided record evidence in support of an investment of a \$4,350 loop cost cap. The Joint

Respondents contend that Sprint, not the Commission, therefore misapprehended the evidence and the purpose of this proceeding.

First, the Joint Respondents state that Sprint's motion relies on outside the record discussion about wireless service in an effort to argue that the \$4,350 per line cap is not an economically achievable alternative for Sprint. This information cannot be considered record information that we overlooked. Second, the Joint Respondents contend that it was appropriate for this Commission to rely on witness Caldwell's testimony even though it may not be Florida-specific or Sprint-territory specific. The purpose of this case is modeling and not rate setting; therefore, for modeling purposes, the BellSouth data/survey is more precise and localized than the national default.

Next, the Joint Respondents disagree about Sprint's contention that some Commissioners may have misapprehended the materiality of the cap value. The Joint Respondents note that we speak through our orders and not our conversation at our agenda conferences. See Section 120.52(7), Florida Statutes. Sprint cannot question how each Commissioner weighed the evidence so long as there is a proper evidentiary basis for our decision.

Finally, the Joint Respondents argue that the parties in no way stipulated this issue of the loop cost investment cap. No party has accepted or proffered any stipulation on this subject. Sprint's entire argument seems to indicate that an extraordinary evidentiary burden must be overcome in order to deviate from the \$10,000 default value. This is simply not the case, as Sprint and every other party must put on witnesses and evidence for issues that are in dispute. Sprint did not put on its case, and its arguments do not meet the requirements for reconsideration.

C. CONCLUSION

Upon review, we find several of the arguments of Sprint to be compelling. Most importantly, we believe that there was no evidence in the record to support that: 1) BellSouth's study was Florida-specific; and 2) the study was reasonably applicable to the territories of any carrier other than BellSouth. Arguably, the BellSouth study results as presented by BellSouth witness Caldwell may be more Florida-specific than the national default values. The record is not completely clear on that issue. However, there is no record evidence to support our previous conclusion that the \$4,350 cap value is appropriate for modeling the cost of basic local

telecommunications service in either Sprint or GTEFL's respective territories/service areas. We agree with Sprint that the evidence can only reasonably support the use of the \$4,350 cap for modeling BellSouth's territory. Therefore, we hereby grant Sprint's Motion for Reconsideration. Accordingly, the \$4,350 loop investment cap shall only be applied in modeling the cost of service in BellSouth's territory. The revised model calculations implementing this reconsideration decision are attached to this Order as Attachment A and incorporated herein.

VI. GTEFL'S PETITION FOR RECONSIDERATION

As indicated in the Background, on January 22, 1999, GTEFL filed a Petition for Reconsideration of Order No. PSC-99-0068-FOF-TP. Specifically, GTEFL seeks reconsideration of our decisions on cost model inputs for depreciation and cost of capital.

A. DEPRECIATION

1. GTEFL

Essentially, GTEFL believes that the Commission's decision on depreciation issues is arbitrary and lacking in evidentiary support. First, GTEFL contends that the decision arbitrarily departs from the depreciation lives GTEFL uses for financial reporting and that the Commission approved in the past. GTEFL argues that the Commission's departure from GTEFL's depreciation lives used for financial purposes and also lives inherent in the Commission's 1992 GTEFL depreciation prescription was impermissibly arbitrary. Further, according to GTEFL, the Commission overlooked and failed to consider GTEFL's evidence that many of the rates it proposed in this proceeding were the same as those reflected in the 1992 prescription.

Second, GTEFL argues that the Commission never explains in its Order why devising depreciation inputs for a cost model is different from setting depreciation rates to be factored into retail rates, or what effect this difference had. Further, GTEFL argues that the Order never discusses any considerations in the proxy model context that might be distinct from those used for the purposes of financial reporting or even depreciation prescription.

Next, GTEFL argues that the Commission's assumption that the FCC prescriptions are forward-looking is arbitrary and simply a supposition. It does not reflect the "considered response to the

evidence" that is a fundamental requisite of administrative rulings. It is therefore not a sufficient basis for decision-making.

In addition, GTEFL argues that the Commission's depreciation ruling violates the requirements and intent of the 1995 revisions to Chapter 364, Florida Statutes. In return for opening the local exchange market to competition, the Legislature eliminated depreciation prescriptions and other remnants of rate base regulation for price cap carriers. The Florida Legislature therefore cannot have intended for the Commission to revert to depreciation prescriptions in selected contexts.

Finally, GTEFL argues that the Commission has not adequately justified its depreciation inputs. In comparison to the 1992 prescription, the Commission's decision in this current proceeding is backward-looking. The Commission has offered no basis for ordering depreciation parameters that depart from those the Legislature permits the company to use for financial reporting purposes.

2. JOINT RESPONDENTS

The Joint Respondents contend that GTEFL's petition for reconsideration is mere reargument of the position it took in the hearing in this proceeding. First, the Joint Respondents note that AT&T/MCI witness Majoros provided testimony which rebus GTEFL's contention that the Commission arbitrarily failed to utilize the depreciation lives GTEFL uses for financial reporting or which the Commission had approved in past proceedings. Second, the Commission's Order in this case specifically discusses the FCC's Universal Service Order and how the FCC's Order lays the "groundwork" for the Commission's actions in this proceeding. Most importantly, GTEFL's Petition demonstrates GTEFL's fundamental misunderstanding of the purpose of this proceeding, which was to follow a specific, one-time 1998 legislative directive to model, on a forward-looking basis, the cost of basic local telecommunications services. See Section 364.025(4)(b), Florida Statutes. Furthermore, the 1995 revisions to Chapter 364 do not bind the Commission given this subsequent, specific legislative directive.

DISCUSSION

First, we will address GTEFL's argument regarding our decision to use depreciation lives other than those used for financial reporting purposes. As discussed in the Order at issue, AT&T/MCI witness Majoros testified that lives used for financial accounting are governed by Generally Accepted Accounting Principles (GAAP) and the conservatism principle would hold. For example, alternative expense amounts are acceptable, the alternative having the least favorable effect on net income should be used. He also pointed out that GTEFL itself argued to the FCC in 1993 that conservatism may not always serve the interest of ratepayers. Therefore, our use of depreciation lives other than those used for financial reporting purposes is not necessarily inappropriate. We believe the approved depreciation lives are appropriate values for a cost model designed to determine the forward-looking cost of providing basic local telecommunications services. Accordingly, our decision to use depreciation lives different from those used for financial purposes is not impermissibly arbitrary.

Next, we turn to GTEFL's argument regarding our 1992 depreciation prescription. Although not specifically addressed in the Order, an exhibit proffered at the hearing in this proceeding shows a comparison of the lives we approved in GTEFL's 1992 prescription and those GTEFL recommended in this proceeding. The comparison addresses only eight of GTEFL's thirty-one accounts. According to GTEFL witness Sovereign, GTEFL addressed only the lives for the eight technology-sensitive accounts because these accounts were considered the most significant.

In its Petition for Reconsideration (Petition), GTEFL fails to point out that its 1992 depreciation prescription was the result of a stipulation between GTEFL, the Office of Public Counsel, and the Florida Cable Television Association (Stipulation). Further, the Stipulation addresses depreciation rates, not lives and salvage values. Additionally, the Stipulation states: "This Stipulation is based on the unique factual circumstances of this case and shall have no precedential value in subsequent proceedings."

As pointed out in the Order in this proceeding, the issue is the appropriate life and salvage parameters to use in a cost proxy model to determine the cost of basic local telecommunications service for establishing a permanent high cost funding mechanism as required by the Legislature. AT&T/MCI's witness Majoros and GTEFL's witness Sovereign both agreed that, for purposes of this

proceeding, the same depreciation parameters could be assumed for each of the large LECs. Finally, pages 71-86 of the Order clearly show that we considered the evidence presented by each party in support of its recommended depreciation parameters.

Based on the above, we did not overlook or fail to consider GTEFL's 1992 depreciation rate prescription. The 1992 Stipulation need have no precedential value in this proceeding. Our approved depreciation life and salvage inputs for the cost proxy model are based on the evidence presented by each party.

Furthermore, the depreciation parameters (lives and salvage values) approved in this proceeding are for a universal service provider. As discussed on pages 70 and 71 of the Order, there is record evidence to support the use of the same depreciation parameters for each of the large LECs. Additionally, in determining the reasonableness of each party's depreciation recommendations, pages 72-81 of the Order are replete with evidence and rationale as to why GTEFL's recommendations are not considered appropriate.

Next, we will address GTEFL's contention that our use of a forward-looking model was arbitrary. We took official recognition at the hearing of the FCC's May 7, 1997, Universal Service Order. Our Order at issue discusses the Universal Service Order and how the FCC's requirements can provide insight and general guidance in selecting a forward-looking economic cost model. The FCC's criteria number five requires that "economic lives and net salvage percentages used in the model to compute depreciation expense must be within the FCC-authorized range." Therefore, with respect to depreciation parameters used in a cost proxy model for the purpose of determining a high cost funding mechanism, the FCC depreciation ranges can be characterized as "forward-looking." Thus, our reliance on the FCC Universal Service Order was not arbitrary.

Our Order also addresses BellSouth's retirement rates that indicate that reliance on only history would yield lives for metallic cables similar to those prescribed in the 1970's before the advent of fiber technology. The Order also points out that while similar data was not available from GTEFL or Sprint, there was no reason for us to believe that these companies would not exhibit similar indications.

The issue is which "forward-looking" lives and salvage values are appropriate to use in this proceeding. The Order clearly shows

the Commission considered the evidence provided by each company in support of its recommended depreciation parameters. Additionally, page 70 of the Order reflects that GTEFL was unable to clearly indicate how competitive factors should be considered in the determination of lives and salvage values. Although not specifically addressed in the Order, a hearing exhibit containing the transcript of witness Sovereign's deposition indicates that the proper weighting of competitive factors was more a matter of GTEFL's reliance on opinions from industry, such as a study performed by Technology Futures, Inc. (TFI). As clearly indicated in the Order, we found the results of the substitution model used in the TFI studies not to be reasonable.

Finally, we will address GTEFL's argument that depreciation ruling violates Chapter 364, Florida Statutes. believe this argument has no bearing on this proceeding. The Order is very clear that the purpose of this proceeding is not to prescribe depreciation rates for BellSouth, GTEFL, or Sprint, but rather to determine the reasonableness of the depreciation life and salvage inputs to be included in the cost proxy model for establishing a permanent high cost funding mechanism as required by the Legislature. Furthermore, the record evidence shows that, for purposes of this proceeding, the same set of life and salvage values could be used for each of the large local exchange companies.

4. CONCLUSION

Upon consideration, we find that GTEFL's argument that we have not adequately justified our depreciation inputs is without merit. As discussed, GTEFL was unable to clearly indicate how the various sources it used as benchmark comparisons entered into the development of its recommended life and salvage values. Additionally, the Order is replete with discussions regarding our review and analysis of each party's recommended life and salvage value for each depreciable account.

GTEFL's argument that our decision in this proceeding is backward-looking compared to GTEFL's 1992 depreciation prescription is unfounded. As discussed above, the 1992 Stipulation was based on unique facts and circumstances and has no precedential value. Similarly, our decision in this proceeding is based on a review and analysis of the evidence presented by the parties to address a legislative directive.

According to GTEFL's witness Sovereign, the recommended lives were developed using an industry analysis performed by TFI and professional opinions from GTE and the Regional Bell Operating Companies (RBOCs). The Order clearly addresses our concerns with the substitution model used in TFI's studies and also addresses why the results were considered unreasonable. Accordingly, we hereby deny GTEFL's Petition for Reconsideration with regard to depreciation issues.

B. COST OF CAPITAL

1. GTEFL

GTEFL argues that the Commission's capital structure ruling must be reconsidered because it overlooks GTEFL's evidence in favor of information outside the record of this proceeding and draws conclusions that are not justified by the evidence the Commission cited in its Order.

First, GTEFL contends that the Commission cannot rely on mostly unnamed orders from other states while ignoring information in the Commission's own record. GTEFL supports his recommended capital structure with a Massachusetts decision. Second, GTEFL argues that the Commission supported its rejection of GTEFL's proposed capital structure based on a source outside of the record in this proceeding. Third, because AT&T/MCI witness Hirshleifer's analysis is not grounded in the "statutory directive," the Commission's reliance upon his testimony and conclusions is ill-Fourth, the Commission's cost of capital analysis overlooks or misconstrues risk evidence. Because Hirshleifer's testimony did not pertain to local service, the Commission's conclusions based on that evidence are unjustified. Moreover, GTEFL argues that the Commission overlooked GTEFL's Florida-specific evidence of risk. Finally, according to GTEFL, the Commission's decision was skewed by its misapprehension of and failure to consider key points of fact.

2. JOINT RESPONDENTS

The Joint Respondents state that GTEFL's primary argument with regard to the Commission's decision on cost of capital is that the decision lacks evidentiary support. The Joint Respondents note that the Commission specifically relied upon the testimony of AT&T/MCI witness Hirshleifer in rejecting GTEFL's cost of capital proposals. The Joint Respondents stress that, on the question of

business risk, GTEFL's own Petition for Reconsideration makes clear that GTEFL's complaint with the Order is the weight interpretation given to the GTEFL testimony. The Joint Respondents argue that the Commission clearly weighed the evidence and rejected GTEFL witness Vander Weide's testimony in favor of the testimony of AT&T/MCI witness Hirshleifer, which is the Commission's See Gulf Power Co. v. FPSC, 453 So.2d 799 (Fla. prerogative. 1984); United Telephone Co. v. Mayo, 345 So.2d 648 (Fla. 1977). conclusion, the Joint Respondents contend that GTEFL's petition is simply reargument, and reconsideration therefore is improper and should be denied.

DISCUSSION

GTEFL's claim that our capital structure decision lacks evidentiary support is unfounded. Our decision to adopt a capital structure of 60% equity and 40% debt is clearly supported by the record. Appearing on behalf of Sprint, witness Billingsley relied upon a capital structure of 59.6% equity and 40.4% debt to estimate Sprint's weighted average cost of capital. Appearing on behalf of BellSouth, witness Billingsley relied upon a capital structure of 60% equity and 40% debt to estimate BellSouth's weighted average cost of capital. Finally, witness Hirshleifer, appearing on behalf of AT&T/MCI, relied upon an average capital structure of 61.5% equity and 38.5% debt for estimating the weighted average cost of capital for BellSouth, Sprint, and GTEFL. Therefore, contrary to GTEFL's claim, our capital structure ruling is supported by evidence in the record.

As noted above, we clearly relied upon evidence in the record in rendering our capital structure decision. Our Order's reference to orders from other state regulatory commissions was made as a point of comparison, not as a basis for the decision as GTEFL alleges. It is well within our prerogative to consider decisions regarding similar issues rendered in other jurisdictions. Order referenced only the Hawaii and Alaska decisions by name because these decisions represented the range of equity ratios approved for GTE-affiliated companies in other states since the passage of the Telecommunications Act of 1996. In response to our staff's discovery request for copies of all state commission orders issued since January 1, 1996, involving the GTE parent company (GTOC) or any of its affiliated companies in which cost of capital was decided, GTEFL provided eight orders. These orders were entered into the record as part of a composite exhibit. response to our staff's discovery request regarding every state in

which witness Vander Weide testified on behalf of GTE since January 1, 1996, GTEFL responded that he appeared on behalf of GTE in 13 states. However, GTEFL relies upon a Massachusetts case that was not referenced in either response and therefore was not a part of the composite exhibit referenced above. It is evidence that is not in the record. Most importantly, we based our decision upon evidence in the record, i.e., the testimonies of witnesses Billingsley and Hirshleifer, and not the fact that all the other state regulatory commissions witness Vander Weide appeared before on behalf of GTE also rejected his recommended capital structure, as shown in the orders which were in the composite exhibit.

GTEFL alleges that we supported our rejection of GTEFL's proposed capital structure based on other information not in the record of this proceeding. GTEFL's allegation is incorrect on two counts. First, the Duff & Phelps Credit Rating Company press release cited by GTEFL in its petition is in the record. This document was provided by GTEFL in response to a staff discovery request and was entered into the record as part of an exhibit. It is puzzling why GTEFL would now argue that it does not know what the press release says. The reference to the Duff & Phelps press release and how GTE planned to finance the failed acquisition of MCI was only provided to illustrate what the document says on its face.

Next, we believe that GTEFL's argument regarding our failure to follow the statutory directive is without merit. We note that this is a proceeding to select a cost proxy model that estimates forward-looking cost of providing basic local telecommunications service in Florida. The ultimate purpose of selecting such a model is to assist the Legislature in establishing a permanent universal service fund that will preserve and advance universal service, as required by Section 254 Telecommunications Act of 1996 ("Act") and Section 364.025, Florida Statutes. In its Post-Hearing Statement and Brief, GTEFL appears to recognize that the purpose of this proceeding is to determine report to the Legislature the cost of basic local telecommunications service appropriate for establishing a permanent universal service mechanism and that our selection of a cost model should be predicated on this underlying purpose.

Apparently, GTEFL has completely overlooked the fact that witness Hirshleifer's testimony discusses at length the business of providing universal service. In our Order, we state that we relied upon AT&T/MCI witness Hirshleifer's testimony regarding the

provision of universal service, which GTEFL accurately points out in its brief is the "underlying purpose" of this proceeding. Moreover, GTEFL witness Vander Weide admitted that, in the context of a study to look into the possibility of a universal service fund, many people would use universal service and basic local telecommunications service as synonyms.

Next, GTEFL argues that we misconstrued the risk evidence. It is GTEFL, not this Commission, that has misconstrued the risk evidence in the record. As noted in the Order and as GTEFL readily admits in its Petition for Reconsideration, the financial markets continuously absorb and incorporate information about competition and technological and regulatory change. Witness Hirshleifer testified that, when assessing the cost of capital of any publiclytraded company, the market accounts for all known risks existing currently and the possibility of risks that could develop or increase in the future. He further noted that the market continuously evaluates real-world information regarding all relevant risks, including those which may arise or increase in the future, and incorporates the likelihood of those risks occurring into the current costs of capital of the telephone holding Witness Vander Weide acknowledged that investors companies. consider all risks, including industry changes, that a firm might incur over the future life of the company. Each of the witnesses in this proceeding relied upon market information in the analyses supporting their respective cost of capital recommendations. relying upon the testimonies of witnesses Vander Weide, Billingsley, and Hirshleifer in rendering our cost of capital decision, we have considered the relevant risk evidence in the record.

Similarly, GTEFL's claim that we overlooked GTEFL's specific evidence of risk is unfounded. In our Order, we state that to the extent the discussion of risk in witnesses Billingsley's and Vander testimonies addressed the global telecommunications industry rather than the actual business of providing universal service in Florida, it was irrelevant to our determination of the cost of capital in this proceeding. conclusion is supported by the testimony of witness Hirshleifer and other evidence in the record. The Order goes on to state that, to the extent the market considers the risks referred to by witnesses Billingsley and Vander Weide relevant to the provision of basic local service, it has been accounted for in the financial measures used by the witnesses to estimate the cost of capital of these companies. This conclusion is similarly supported by evidence in

the record. Simply because we adopted a cost of capital figure different from what GTEFL recommended does not mean we did not consider GTEFL's Florida-specific evidence of risk as GTEFL alleges in its petition.

claims that certain aspects of witness Hirshleifer's DCF analysis are arbitrary and depart from market considerations and therefore, there is no basis for our reliance on his testimony. We simply disagreed with GTEFL's opinion on this Witness Hirshleifer testified that the form of the DCF model he used is well supported in the financial community. addition, witness Hirshleifer testified that it was witness Vander Weide's analysis that was arbitrary and departed from market considerations because he did not demonstrate how his index of companies from such diverse industries, such as automobile manufacturers, oil companies, producers of food and ingredients, publishing and entertainment companies, pharmaceutical companies, was comparable in risk to GTEFL. Witness Hirshleifer concluded that because witness Vander Weide's analysis was based upon the performance of large industrial companies rather than a group of comparable companies, his results were of no relevance to the business of providing universal service. decision in this proceeding was not "skewed by its misapprehension of and failure to consider key points of fact" as GTEFL alleges, but rather was based upon evidence in the record with which GTEFL simply disagrees.

Finally, GTEFL incorrectly alleges in its petition that witness Vander Weide's testimony regarding the appropriate capital structure for calculating a firm's weighted cost of capital was not rebutted in this proceeding. Not only did witness Hirshleifer directly rebut witness Vander Weide's testimony, but as mentioned earlier, witness Vander Weide's testimony was de facto rebutted by the fact that no other state commission has accepted his recommended capital structure for purposes of determining the weighted average cost of capital in this type of proceeding.

4. CONCLUSION

In considering the evidence in the record when rendering our decision on the appropriate capital structure and overall weighted cost of capital for purposes of this proceeding, we evaluated and weighed the evidence and testimonies provided by witnesses Vander Weide, Billingsley, and Hirshleifer. Such an evaluation is clearly our prerogative. After a careful review of the record in this

case, it is clear we did not rely upon information outside the record, draw unwarranted conclusions from information in the record, or misapprehend evidence in the record, as alleged by GTEFL. Moreover, GTEFL's petition did not identify any points of fact or law which were overlooked or not considered. GTEFL's arguments regarding our capital structure and cost of capital decisions are simply reargument of issues that were decided differently than were advocated by GTEFL. For these reasons, we hereby deny GTEFL's Petition for Reconsideration with regard to cost of capital issues.

C. OVERALL CONCLUSION

In summary, we hereby deny GTEFL's Petition for Reconsideration of Order No. PSC-99-0068-FOF-TP in its entirety.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that GTE Florida Incorporated's Motion to Strike the Joint Petitioners' Joint Response to GTE Florida Incorporated's Response in Support of Sprint-Florida, Incorporated's Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP is granted. It is further

ORDERED that Sprint-Florida, Incorporated's Request for Oral Argument on its Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP is denied. It is further

ORDERED that Sprint-Florida, Incorporated's Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP is granted as specified in this Order. It is further

ORDERED that GTE Florida Incorporated's Petition for Reconsideration of Order No. PSC-99-0068-FOF-TP is denied. It is further

ORDERED that this docket is closed.

By ORDER of the Florida Public Service Commission this $\underline{26th}$ day of \underline{April} , $\underline{1999}$.

BLANCA S. BAYÓ, Director

Division of Records and Reporting

(SEAL)

WPC

DISSENT

Commissioner J. Terry Deason dissented on the Commission's decision to grant Sprint-Florida, Inc.'s Motion for Reconsideration of Order No. PSC-99-0068-FOF-TP.

NOTICE OF JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

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SOUTHERN BELL TEL - CAPPED COST

Florida

	Monthly Cost per Line per Month								
Wire Center ARCHFLMARS0	Capital Cost		Operating Expense		White F	White Pages Directory Listing Expense		Total	
	\$ 42	.53	S	16.36	S	0.40	S	Cost	
BCRTFLBTDS0	\$ 9	.84	S	8.81	S	0.40		59.29	
BCRTFLMADS1	\$ 12	.56	S	9.18	S		5	19.05	
BCRTFLSADS0	\$ 14	.28	S	9.59	S	0.40	5	22.13	
BGPIFLMARS0		.59	S	11.71	S	0.40	5	24.26	
BKVLFLJFDS0		76	S	13.47	S	0.40	S	33.71	
BLDWFLMARS0	Colored State Control of the Control	19	S	13.26	S	0.40	S	44.63	
BLGLFLMADS0		.07	S	10.70	S	0.40	S	41.85	
BNNLFLMARS0	\$ 30.	425/272-47	S	13.70	5	0.40	S	28.17	
BRSNFLMARS0	\$ 40.	- Inches (1996)	S	15.95	\$	0.40	\$	44.48	
BYBHFLMADS0	\$ 14.		5	9.51	S	0.40	5	56.81	
CCBHFLAFRS0	\$ 32.	1000000	\$	13.49	S	0.40	S	24.60	
CCBHFLMADS0	\$ 15.	OBST-FILE	\$	9.56	S	0.40	\$	46.30	
CDKYFLMARS0	\$ 32.	NEW YORK	S	14.45	The William Col. 7 Col. Photo. Inch.	0.40	\$	25.13	
CFLDFLMARS0	\$ 43.	NO VENCTOR	\$		S	0.40	S	47.00	
CHPLFLJADS0	\$ 36.	100000000000000000000000000000000000000	\$	16.60	S	0.40	5	60.99	
CNTMFLLEDS1	\$ 26.	TAXABLE P	\$	14.76	S	0.40	5	51.50	
COCOFLMADS0	\$ 17.	Section .	\$	12.58	S	0.40	S	39.26	
COCOFLMEDS0	\$ 16.	200000000000000000000000000000000000000	5	10.38	S	0.40	\$	28.42	
CSCYFLBARS0	\$ 31.		\$	10.14	S	0.40	\$	26.84	
DBRYFLDLDS0	\$ 19.	Autor State	5	13.40	S	0.40	S	45.66	
DBRYFLMARS1	\$ 17.		S	10.99	S	0.40	S	31.19	
DELDFLMADS0	\$ 18.		5	10.90	S	0.40	S	29.19	
DLBHFLKPRS0	\$ 12.0			10.68	S	0.40	S	29.41	
DLBHFLMARS0	\$ 14.5	100	\$	9.43	S	0.40	5	22.51	
DLSPFLMARS0	\$ 33.8	CONTROL OF	\$	9.58	S		\$	24.53	
DNLNFLWMRS0		CONTRACT OF	\$	14.36	S	0.40	S	48.64	
DRBHFLMADS0			\$	14.82	S	0.40	S	50.91	
DYBHFLFNRS0		100000000000000000000000000000000000000	\$	9.27	s	0.40	S	22.39	
DYBHFLMADS0		15	SECTION AND DESCRIPTION OF THE PERSON NAMED IN COLUMN TWO	9.25	S	0.40	S	20.09	
DYBHFLOBDS0	\$ 14.3		5	9.60	S	0.40	S	24.35	
OYBHFLOSRS0	\$ 19.4	200,000	\$	10.60	\$	0.40	S	30.49	
OYBHFLPODS0	\$ 16.6		S	10.08	S	0.40	S	27.08	
7 I DITT L TOUSU	\$ 16.3	4	S	10.01	S	0.40	S	26.76	

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SOUTHERN BELL TEL - CAPPED COST

Florida

	Monthly Cost per Line per Month						
Wire Center EGLLFLBGDS0	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost			
	\$ 14.93	\$ 9.87	\$ 0.40	\$ 25.20			
EGLLFLIHDS0	\$ 15.98	\$ 10.07	\$ 0.40	\$ 26.45			
EORNFLMARS0	\$ 33.33	\$ 14.12	\$ 0.40	\$ 47.85			
FLBHFLMARS0	\$ 20.53	\$ 11.40	\$ 0.40	\$ 32.33			
FRBHFLFPDS0	\$ 19.02	\$ 10.92	\$ 0.40	\$ 30.34			
FTGRFLMARS0	\$ 30.28	\$ 12.86	\$ 0.40	\$ 43.54			
FTLDFLCR56E	\$ 11.71	\$ 9.12	\$ 0.40	\$ 21.24			
FTLDFLCYDS0	\$ 10.53	\$ 8.89	\$ 0.40	\$ 19.81			
FTLDFLJADS0	\$ 13.41	\$ 9.45	\$ 0.40	\$ 23.26			
FTLDFLMRDS0	\$ 12.04	\$ 9.12	\$ 0.40	\$ 21.57			
FTLDFLOADS0	\$ 12.40	\$ 9.19	\$ 0.40	\$ 21.99			
FTLDFLPLCG0	\$ 15.78	\$ 9.82	\$ 0.40	\$ 26.00			
FTLDFLSGDS0	\$ 7.28	\$ 8.44	\$ 0.40	\$ 16.12			
FTLDFLSU74E	\$ 12.30	\$ 9.26	\$ 0.40	\$ 21.97			
FTLDFLWNDS0	\$ 9.67	\$ 8.87	\$ 0.40	\$ 18.94			
FTPRFLMACG0	\$ 19.73	\$ 10.72	\$ 0.40	\$ 30.86			
GCSPFLCNDS0	\$ 30.18	\$ 13.36	\$ 0.40	\$ 43.93			
GCVLFLMARS0	\$ 45.31	\$ 17.00	\$ 0.40	\$ 62.71			
GENVFLMARS0	\$ 40.12	\$ 15.93	\$ 0.40	\$ 56.40			
GLBRFLMCDS0	\$ 18.94	\$ 10.74	\$ 0.40	\$ 30.09			
GSVLFLMADS0	\$ 14.55	\$ 9.70	\$ 0.40	\$ 24.65			
GSVLFLNW33E	\$ 15.65	\$ 9.99	\$ 0.40	\$ 26.04			
HAVNFLMADS0	\$ 34.79	\$ 15.00	\$ 0.40	\$ 50.18			
HBSDFLMADS0	\$ 18.12	\$ 10.69	\$ 0.40	\$ 29.22			
HLNVFLMADS1	\$ 26.98	\$ 12.79	\$ 0.40	\$ 40.18			
HLWDFLHA45E	\$ 9.45	\$ 8.78	\$ 0.40	\$ 18.63			
HLWDFLMADS0	\$ 12.37	\$ 9.24	\$ 0.40	\$ 22.01			
HLWDFLPEDS0	\$ 13.48	\$ 9.40	\$ 0.40	\$ 23.27			
HLWDFLWHDS0	\$ 15.36	THE STATE OF THE S	\$ 0.40	\$ 25.44			
HMSTFLEARS0	\$ 61.67		\$ 0.40	\$ 82.61			
HMSTFLHMDS0	\$ 16.02	THE PARTY OF THE P	\$ 0.40	\$ 26.14			
HMSTFLNARS0	\$ 28.70	The state of the s	\$ 0.40	\$ 41.21			
HTISFLMADS0	\$ 16.19		\$ 0.40	\$ 26.50			

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SOUTHERN BELL TEL - CAPPED COST

Florida

	Monthly Cost per Line per Month						
Wire Center HWTHFLMARS0	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost			
	\$ 52.19	\$ 18.43	\$ 0.40	\$ 71.02			
ISLMFLMARS0	\$ 16.10	\$ 10.32	\$ 0.40	\$ 26.82			
JAY FLMARSO	\$ 61.70	\$ 20.28	\$ 0.40	\$ 82.33			
JCBHFLABRS0	\$ 14.28	\$ 9.87	\$ 0.40	\$ 24.55			
JCBHFLMA24E	\$ 15.17	\$ 9.82	\$ 0.40	\$ 25.39			
JCBHFLSPRS0	\$ 10.71	\$ 9.15	\$ 0.40	\$ 20.26			
JCVLFLARDS0	\$ 14.02	\$ 9.68	\$ 0.40	\$ 24.09			
JCVLFLBWDS0	\$ 16.57	\$ 9.94	\$ 0.40	\$ 26.91			
JCVLFLCLDS0	\$ 11.96	\$ 9.15	\$ 0.40	\$ 21.51			
JCVLFLFCDS0	\$ 14.65	\$ 9.79	\$ 0.40	\$ 24.84			
JCVLFLIARS0	\$ 10.27	\$ 9.25	\$ 0.40	\$ 19.92			
JCVLFLJTRS0	\$ 6.68	\$ 8.34	\$ 0.40	\$ 15.42			
JCVLFLLF76E	\$ 20.25	\$ 10.97	\$ 0.40	Control of the second			
JCVLFLNODS0	\$ 17.67	\$ 10.51	\$ 0.40				
JCVLFLOWDS0	\$ 20.22	\$ 10.99	\$ 0.40				
JCVLFLRV38E	\$ 17.18	\$ 10.12	\$ 0.40				
JCVLFLSJ73E	\$ 14.58	\$ 9.66	\$ 0.40				
JCVLFLSMDS0	\$ 11.91	\$ 9.21	\$ 0.40	\$ 24.64			
JCVLFLWCDS0	\$ 16.52	\$ 10.21	\$ 0.40	\$ 21.52			
JPTRFLMA74E	\$ 15.28	\$ 9.97	\$ 0.40	\$ 27.13			
KYHGFLMARS0	\$ 34.23	\$ 14.59	\$ 0.40	\$ 25.64			
KYLRFLLSRS0	\$ 18.23	\$ 10.56		\$ 49.22			
KYLRFLMARS0	\$ 18.39	\$ 10.42	0.10	\$ 29.19			
KYWSFLMADS0	\$ 12.35	\$ 9.15		\$ 29.21			
LKCYFLMADS0	\$ 28.47	\$ 13.01		\$ 21.90			
LKMRFLABRS0	\$ 14.67	\$ 10.24	0.10	\$ 41.88			
LKMRFLMADS0	\$ 10.10	\$ 9.00	0.10	\$ 25.31			
LYHNFLOHDS0	\$ 23.88	\$ 11.84		\$ 19.50			
MCNPFLMARS0	\$ 54.98	\$ 18.89		\$ 36.11			
MDBGFLPMDS0	\$ 27.89	\$ 13.04	0.10	\$ 74.27			
MIAMFLAEDS0	\$ 10.61	\$ 8.92		\$ 41.33			
MIAMFLAL63E	\$ 13.08	\$ 9.43	Viiv	\$ 19.93			
MIAMFLAPDS0	\$ 8.89	STATE OF THE PARTY	\$ 0.40	\$ 22.91			
	0.09	\$ 8.60	\$ C.40	\$ 17.89			

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SOUTHERN BELL TEL - CAPPED COST

Florida

	Monthly Cost per Line per Month						
Wire Center MIAMFLBA85E	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost			
	\$ 10.18	\$ 8.89	\$ 0.40	\$ 19.47			
MIAMFLBCDS0	\$ 10.57	\$ 8.98	\$ 0.40	\$ 19.95			
MIAMFLBRDS0	\$ 8.53	\$ 8.64	\$ 0.40	\$ 17.56			
MIAMFLCADS0	\$ 13.95	\$ 9.42	\$ 0.40	\$ 23.77			
MIAMFLFLDS0	\$ 10.16	\$ 8.88	\$ 0.40	\$ 19.44			
MIAMFLGRDS0	\$ 7.19	\$ 8.32	\$ 0.40				
MIAMFLHLDS0	\$ 11.99	\$ 9.12	\$ 0.40	CONTRACTOR OF THE CONTRACTOR			
MIAMFLIC86E	\$ 10.00	\$ 8.85	\$ 0.40				
MIAMFLKEDS0	\$ 8.00	\$ 8.62	\$ 0.40	Control of the last of the las			
MIAMFLMERS0	\$ 9.06	\$ 8.70	\$ 0.40	\$ 17.02			
MIAMFLNMDS0	\$ 10.02	\$ 8.92	\$ 0.40	\$ 18.16			
MIAMFLNSDS0	\$ 15.74	\$ 9.84	\$ 0.40	\$ 19.34			
MIAMFLOL68E	\$ 17.19	\$ 10.05	\$ 0.40	\$ 25.97			
MIAMFLPB88E	\$ 12.63	\$ 9.32	0.10	\$ 27.64			
MIAMFLPLDS0	\$ 9.89	\$ 8.80	V.10	\$ 22.34			
MIAMFLRRDS0	\$ 13.93	\$ 9.56	0.10	\$ 19.08			
MIAMFLSH75E	\$ 14.69	\$ 9.66	3.10	\$ 23.89			
MIAMFLSO59E	\$ 14.48	\$ 9.55		\$ 24.75			
MIAMFLWDDS0	\$ 16.36	\$ 9.65		\$ 24.42			
MIAMFLWM26E	\$ 11.41	\$ 9.08		\$ 26.41			
MICCFLBBRS0	\$ 13.73	\$ 9.66		\$ 20.88			
MLBRFLMADS0	\$ 17.96	\$ 10.32	0.10	\$ 23.78			
MLTNFLRADS0	\$ 24.48	\$ 12.06	2.10	\$ 28.68			
MNDRFLAVDS0	\$ 7.97	\$ 8.60		\$ 36.94			
MNDRFLLODS0	\$ 15.24	\$ 9.90		\$ 16.97			
MNDRFLLWRS0	\$ 19.54	\$ 11.23		\$ 25.54			
MNSNFLMARS0	\$ 71.85	\$ 23.11		\$ 31.17			
MRTHFLVERS0	\$ 18.66	\$ 10.53		\$ 95.35			
MXVLFLMARS0	\$ 60.53	\$ 20.43		\$ 29.59			
NDADFLAC94E	\$ 11.98	\$ 9.19	0.10	\$ 81.36			
NDADFLBR62E	\$ 15.21	\$ 9.19		\$ 21.57			
NDADFLGGDS0	\$ 12.47		0.10	\$ 25.42			
NDADFLOL93E	\$ 8.59		\$ 0.40	\$ 22.14			
	0.39	\$ 8.67	\$ 0.40	\$ 17.66			

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SOUTHERN BELL TEL - CAPPED COST

Florida

	Monthly Cost per Line per Month						
Wire Center NKLRFLMARS0	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost			
	\$ 17.00	\$ 10.67	\$ 0.40	\$ 28.07			
NSBHFLMA42E	\$ 19.59	\$ 10.77	\$ 0.40	\$ 30.75			
NWBYFLMARS0	\$ 37.43	\$ 15.01	\$ 0.40	\$ 52.84			
OKHLFLMARS0	\$ 29.30	\$ 13.65	\$ 0.40	\$ 43.35			
OLTWFLLNRS0	\$ 51.53	\$ 18.57	\$ 0.40	\$ 70.50			
ORLDFLAPDS0	\$ 15.71	\$ 9.84	\$ 0.40	\$ 25.95			
ORLDFLCLDS0	\$ 14.41	\$ 9.55	\$ 0.40	\$ 24.36			
ORLDFLMADS1	\$ 11.25	\$ 8.97	\$ 0.40	\$ 20.62			
ORLDFLPCDS0	\$ 14.56	\$ 9.64	\$ 0.40	\$ 24.59			
ORLDFLPHDS0	\$ 15.74	\$ 9.89	\$ 0.40	\$ 26.03			
ORLDFLSADS0	\$ 14.64	\$ 9.58	\$ 0.40	\$ 24.63			
ORPKFLMA26E	\$ 15.80	\$ 10.09	\$ 0.40	\$ 26.28			
ORPKFLRWDS0	\$ 15.44	\$ 10.04	\$ 0.40	\$ 25.89			
OVIDFLCADS0	\$ 16.93	\$ 10.37	\$ 0.40				
PACEFLPVRS0	\$ 25.15	\$ 12.38	\$ 0.40	\$ 27.70 \$ 37.93			
PAHKFLMARS0	\$ 24.60	\$ 12.46	\$ 0.40	\$ 37.46			
PCBHFLNTDS0	\$ 20.46	\$ 10.72	\$ 0.40	The second second			
PLCSFLMADS0	\$ 19.48	\$ 10.93	\$ 0.40				
PLTKFLMADS0	\$ 24.64	\$ 12.03	\$ 0.40	\$ 30.82 \$ 37.07			
PMBHFLCSDS0	\$ 11.98	\$ 9.20	\$ 0.40	And the second second second			
PMBHFLFECG0	\$ 14.49	\$ 9.54	\$ 0.40				
PMBHFLMADS0	\$ 13.24	\$ 9.35	\$ 0.40				
PMBHFLTADS0	\$ 13.08	\$ 9.39	\$ 0.40	The second second			
PMPKFLMARS0	\$ 38.10	\$ 15.63	\$ 0.40				
PNCYFLCARS0	\$ 21.22	\$ 11.35	\$ 0.40	\$ 54.14 \$ 32.97			
PNCYFLMADS0	\$ 18.41	\$ 10.44	\$ 0.40				
PNSCFLBL43E	\$ 16.35	\$ 10.01	0.70	Committee of the Commit			
PNSCFLFPDS0	\$ 16.05	\$ 10.01		\$ 26.76 \$ 26.46			
PNSCFLHCRS0	\$ 18.37	\$ 10.99		The state of the s			
PNSCFLPBDS0	\$ 18.58	\$ 10.71		\$ 29.76			
PNSCFLWADS0	\$ 17.75	\$ 10.42		\$ 29.69			
PNVDFLMADS0	\$ 14.67	\$ 9.92		\$ 28.58			
PRRNFLMADS0	\$ 17.22	\$ 10.09		\$ 24.99			
	11.22	10.09	\$ 0.40	\$ 27.71			

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SOUTHERN BELL TEL - CAPPED COST

Florida

Operating Expense \$ 17.32 \$ 10.70 \$ 10.13 \$ 15.40 \$ 11.21	White Pages Directory Listing Expense \$ 0.40 \$ 0.40 \$ 0.40 \$ 0.40	Total Cost \$ 64.67
\$ 10.70 \$ 10.13 \$ 15.40 \$ 11.21	\$ 0.40 \$ 0.40	
\$ 10.13 \$ 15.40 \$ 11.21	\$ 0.40 \$ 0.40	
\$ 15.40 \$ 11.21	\$ 0.40	\$ 29.82
\$ 11.21		\$ 26.06
	V:10	\$ 54.64
	\$ 0.40	\$ 32.63
\$ 11.94	\$ 0.40	\$ 35.67
\$ 10.36	\$ 0.40	\$ 28.03
\$ 9.83	\$ 0.40	\$ 24.97
\$ 10.26	\$ 0.40	\$ 27.28
\$ 11.59	\$ 0.40	\$ 34.74
\$ 37.59	\$ 0.40	\$ 138.80
\$ 10.14	\$ 0.40	\$ 27.36
\$ 20.43	\$ 0.40	\$ 83.54
\$ 15.60	\$ 0.40	\$ 56.05
\$ 10.75	\$ 0.40	\$ 30.25
\$ 20.03	\$ 0.40	\$ 81.42
\$ 9.83		\$ 24.74
	0.10	\$ 28.09
		\$ 59.98
		\$ 19.99
		\$ 25.81
The state of the s		\$ 23.70
		\$ 23.57
		\$ 25.91
STORY OF THE PARTY		\$ 24.88
2000年の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の		\$ 29.15
	Strain Africa Control of the Control	\$ 36.12
		\$ 32.60
CONTRACTOR CONTRACTOR		
		\$ 59.45 \$ 39.76
	\$ 9.83 \$ 10.38 \$ 16.77 \$ 8.95 \$ 9.80 \$ 9.56 \$ 9.43 \$ 9.74 \$ 9.64 \$ 10.52 \$ 11.70 \$ 11.09 \$ 18.07 \$ 16.24 \$ 12.89	\$ 10.38 \$ 0.40 \$ 16.77 \$ 0.40 \$ 8.95 \$ 0.40 \$ 9.80 \$ 0.40 \$ 9.56 \$ 0.40 \$ 9.74 \$ 0.40 \$ 9.74 \$ 0.40 \$ 10.52 \$ 0.40 \$ 11.70 \$ 0.40 \$ 11.09 \$ 0.40 \$ 18.07 \$ 0.40 \$ 16.24 \$ 0.40

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CENTRAL TEL CO OF FLORIDA - CAPPED COST

Florida

A STATE OF THE STA	Monthly Cost per Line per Month						
Wire Center	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total			
ALFRFLXARS0	\$ 80.59			Cost			
BAKRFLXADS0	\$ 79.82	The second second second second second	0.40	\$ 104.9			
BNFYFLXARS0	\$ 59.24	A LANCAS DE LA CASA DEL CASA DE LA CASA DEL CASA DE LA	0.40	\$ 103.5			
CFVLFLXADS0	\$ 40.40	MC VINT STREET STREET, GRANT CO.	0.40	\$ 79.10			
CHLKFLXARS0	\$ 102.99		0.40	\$ 56.57			
CRVWFLXADS0	\$ 21.07		0.40	\$ 132.10			
CTDLFLXARS0	\$ 60.59		0.40	\$ 33.07			
DESTFLXADS0	\$ 8.87	\$ 8.95	0.40	\$ 80.65			
DFSPFLXADS0	\$ 43.41	\$ 16.09	0.40	\$ 18.21			
ELFDFLXADS0	\$ 501.72	\$ 218.76	0.40	\$ 59.89			
FRPTFLXARS0	\$ 59.78	\$ 19.28	\$ 0.40	\$ 720.87			
FTWBFLXADS0	\$ 11.58	\$ 9.51	\$ 0.40	\$ 79.46			
FTWBFLXBDS0	\$ 10.74		\$ 0.40	\$ 21.49			
FTWBFLXCRS0	\$ 12.21	Service and the service of the servi	\$ 0.40	\$ 20.63			
GDRGFLXADS0	\$ 54.17		\$ 0.40	\$ 22.50			
GLDLFLXARS0	\$ 100.75		\$ 0.40	\$ 73.14			
GNVLFLXARS0	\$ 84.22		\$ 0.40	\$ 129.06			
GNWDFLXARS0	\$ 120.13	No. of the last of	\$ 0.40	\$ 108.89			
HRFDFLAJRS0	\$ 193.36		\$ 0.40	\$ 152.67			
HRFDFLXADS0	\$ 554.55	\$ 57.34	\$ 0.40	\$ 251.11			
KGLKFLXARS0		\$ 244.62	\$ 0.40	\$ 799.56			
LEE FLXARSO		\$ 24.75		\$ 109.55			
LWTYFLXARS0	\$ 100.70	\$ 28.80		\$ 129.91			
MALNFLXARS0	\$ 67.55	\$ 21.67		\$ 89.62			
MDSNFLXADS0	\$ 80.47	\$ 23.61	\$ 0.40	\$ 104.48			
MNTIFLXADS0	\$ 25.49	\$ 12.72	\$ 0.40	\$ 38.61			
MRNNFLXADS0	\$ 55.63	\$ 18.45	\$ 0.40	\$ 74.48			
PANCFLXARS0	\$ 30.30	\$ 13.24	\$ 0.40	\$ 43.94			
PNLNFLXARS0	\$ 69.33	\$ 22.42	\$ 0.40				
RYHLFLXARSO	\$ 97.86	\$ 26.71	NAME OF THE PROPERTY OF THE PARTY OF THE PAR	124.97			
		\$ 21.89		95.77			
GBHFLXARS0	\$ 24.49	\$ 12.31		37.20			
HLMFLXADS0	\$ 11.66	\$ 9.80	\$ 0.40 5	ALL DESIGNATION OF THE PARTY OF			
NDSFLXARS0	\$ 47.82	\$ 16.91	\$ 0.40 5				

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CENTRAL TEL CO OF FLORIDA - CAPPED COST

Florida

	Monthly Cost per Line per Month							
Wire Center	Capital Cost		0	perating xpense	White Pages Directory Listing Expense		Total	
SNRSFLXARS0	S	28.98	S	13.32	S			Cost
SPCPFLXADS0	S	75.89	S	23.33	S	0.40	S	42.70
STMKFLXARS0	S	61.41	S	20.14		0.40	S	99.62
STRKFLXADS0	S	35.40	S		S	0.40	S	81.95
TLHSFLXADS0	2	7.85	2	14.81	S	0.40	S	50.60
TLHSFLXBDS0	\$	10.86	C-0-5	8.65	S	0.40	S	16.90
TLHSFLXCDS0	2	The Colon of the C	S	9.43	S	0.40	S	20.70
TLHSFLXDDS0		15.59	S	10.38	S	0.40	S	26.37
TLHSFLXEDS0	5	14.68	S	10.19	S	0.40	S	25.27
	5	8.11	S	9.06	\$	0.40	S	17.57
TLHSFLXFDS0	S	18.80	5	11.01	S	0.40	S	30.21
TLHSFLXGDS0	S	30.63	S	13.50	\$	0.40	\$	44.53
TLHSFLXHDS0	S	13.62	S	10.04	S	0.40	\$	
VLPRFLXADS0	S	18.45	S	11.03	S	a bount of the se		24.05
WSTVFLXARS0	S	9.09	2	9.00	S	0.40	S	29.88
				7.00	A TANK	0.40	S	18.49

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UNITED TELEPHONE OF FLORIDA - CAPPED COST

Florida

Wire Center	Monthly Cost per Line per Month							
	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost				
ALSPFLXADS0	\$ 10.53	\$ 9.26	\$ 0.40	\$ 20.19				
ALVAFLXARS0	\$ 31.86	\$ 14.04	\$ 0.40	\$ 46.29				
APPKFLXADS1	\$ 14.74	\$ 10.16	\$ 0.40	\$ 25.30				
ARCDFLXADS0	\$ 29.94	\$ 13.31	\$ 0.40	\$ 43.65				
ASTRFLXARS0	\$ 34.64	\$ 15.06	\$ 0.40	\$ 50.11				
AVPKFLXADS0	\$ 23.86	\$ 12.04	\$ 0.40	\$ 36.30				
BCGRFLXARS0	\$ 12.22	\$ 10.12	\$ 0.40	\$ 22.74				
BLVWFLXADS0	\$ 24.46	\$ 12.38	\$ 0.40	\$ 37.24				
BNSPFLXADS1	\$ 13.27	\$ 9.78	\$ 0.40	\$ 23.44				
BSHNFLXADS0	\$ 32.11	\$ 13.74	\$ 0.40	\$ 46.25				
BVHLFLXADS0	\$ 19.91	\$ 11.43	\$ 0.40	\$ 31.75				
BWLGFLXARS0	\$ 36.92	\$ 14.94	\$ 0.40	State Control of the				
CHSWFLXARS0	\$ 25.63	\$ 12.72	\$ 0.40					
CLMTFLXADS0	\$ 20.22	\$ 11.16	\$ 0.40					
CLTNFLXARS0	\$ 23.98	\$ 12.12	\$ 0.40	A CONTRACTOR OF THE PARTY OF TH				
CPCRFLXADS0	\$ 12.82	\$ 9.79	\$ 0.40	\$ 36.50				
CPCRFLXBDS1	\$ 15.12	\$ 10.40	\$ 0.40	\$ 23.02				
CPHZFLXADS0	\$ 19.79	\$ 11.38	\$ 0.40	\$ 25.91				
CRRVFLXADS0	\$ 21.54	\$ 11.74		\$ 31.57				
CSLBFLXADS1	\$ 11.19	\$ 9.46	0.10	\$ 33.68				
CYLKFLXADS0	\$ 15.68	\$ 9.89	0.10	\$ 21.05				
CYLKFLXBRS0	\$ 13.51	\$ 9.79		\$ 25.98				
DDCYFLXADS1	\$ 21.33	\$ 11.72		\$ 23.71				
ESTSFLXADS0	\$ 14.67	\$ 10.28		\$ 33.45				
EVRGFLXARS0	\$ 45.85	\$ 14.72		\$ 25.35				
FTMBFLXADS0	\$ 10.28	\$ 9.30	0.10	\$ 60.97				
FTMDFLXARS0	\$ 38.70	\$ 15.13	0.10	\$ 19.99				
FTMYFLXADS0	\$ 9.60	\$ 9.24	0.10	\$ 54.23				
FTMYFLXBDS0	\$ 18.79	\$ 11.05		\$ 19.24				
FTMYFLXCDS2	\$ 9.43	\$ 9.10	VIV	\$ 30.24				
GLGCFLXADS0	\$ 16.02	\$ 10.44		\$ 18.93				
GLRDFLXADS0	\$ 11.07	\$ 9.35	\$ 0.40	\$ 26.87				
GVLDFLXARS0	\$ 36.36		\$ 0.40	\$ 20.82				
	30.30	\$ 14.80	\$ 0.40	\$ 51.56				

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UNITED TELEPHONE OF FLORIDA - CAPPED COST

Florida

	Monthly Cost per Line per Month						
Wire Center HMSPFLXARS0	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost			
	\$ 22.32	\$ 12.14	\$ 0.40	\$ 34.86			
HOWYFLXARS0	\$ 37.75	\$ 15.42	\$ 0.40	\$ 53.57			
IMKLFLXARS0	\$ 28.11	\$ 12.89	\$ 0.40	\$ 41.39			
INVRFLXADS0	\$ 22.53	\$ 11.88	\$ 0.40	\$ 34.81			
IONAFLXARS0	\$ 10.44	\$ 9.45	\$ 0.40	\$ 20.29			
KNVLFLXARS0	\$ 90.38	\$ 24.16	\$ 0.40	\$ 114.94			
KSSMFLXADS0	\$ 15.15	\$ 10.09	\$ 0.40	\$ 25.64			
KSSMFLXBDS1	\$ 14.32	\$ 9.93	\$ 0.40	\$ 24.65			
KSSMFLXDRS0	\$ 11.06	\$ 9.53	\$ 0.40	\$ 20.99			
LBLLFLXADS0	\$ 35.81	\$ 14.09	\$ 0.40	\$ 50.29			
LDLKFLXADS0	\$ 17.15	\$ 10.69	\$ 0.40	\$ 28.24			
LHACFLXADS0	\$ 18.81	\$ 11.31	\$ 0.40	\$ 30.52			
LKBRFLXADS1	\$ 10.01	\$ 9.17	\$ 0.40	\$ 19.59			
LKHLFLXARS0	\$ 21.05	\$ 12.01	\$ 0.40	\$ 33.40			
LKPCFLXARS0	\$ 29.08	\$ 13.11	\$ 0.40	\$ 42.59			
LSBGFLXADS1	\$ 16.30	\$ 10.43	\$ 0.40	\$ 27.12			
MOISFLXADS0	\$ 10.68	\$ 9.39	\$ 0.40	\$ 20.4			
MRDCFLXARS0	\$ 10.54	\$ 9.47	\$ 0.40	\$ 20.4			
MRHNFLXARS0	\$ 27.57	\$ 12.84	\$ 0.40	\$ 40.8			
MTDRFLXADS0	\$ 21.17	\$ 11.56	\$ 0.40	\$ 33.13			
MTLDFLTCRS0	\$ 6.02	\$ 8.79	\$ 0.40	\$ 15.2			
MTLDFLXADS1	\$ 4.98	\$ 8.35	\$ 0.40	\$ 13.7			
MTVRFLXARS0	\$ 22.40	\$ 12.27	\$ 0.40	\$ 35.0			
NFMYFLXADS0	\$ 12.68	\$ 9.83	\$ 0.40	\$ 22.9			
NFMYFLXBDS0	\$ 16.20	\$ 10.51	\$ 0.40	\$ 27.11			
NNPLFLXADS1	\$ 10.24	\$ 9.15	\$ 0.40	\$ 19.79			
NPLSFLXCDS0	\$ 16.84	\$ 10.45	\$ 0.40	\$ 27.69			
NPLSFLXDDS0	\$ 11.19	\$ 9.28	\$ 0.40	\$ 20.8			
OCALFLXADS0	\$ 15.91	\$ 10.43	\$ 0.40	\$ 26.74			
OCALFLXBDS0	\$ 18.13	\$ 10.94	\$ 0.40	\$ 29.4			
OCALFLXCRS0	\$ 15.69	The state of the s	\$ 0.40	\$ 26.6			
OCALFLXJRS0	\$ 12.66		\$ 0.40	\$ 23.15			
OCNFFLXARS0	\$ 38.16	\$ 15.62	\$ 0.40	\$ 54.1			

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UNITED TELEPHONE OF FLORIDA - CAPPED COST

Florida

.Wire Center OKCBFLXADS0	Monthly Cost per Line per Month							
	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost				
	\$ 31.19	\$ 13.07		\$ 44.66				
OKLWFLXADS0	\$ 23.08	\$ 12.08	\$ 0.40	\$ 35.57				
ORCYFLXADS0	\$ 13.32	\$ 10.01	\$ 0.40	\$ 23.73				
ORCYFLXCRS0	\$ 15.97	\$ 10.63	\$ 0.40	\$ 27.00				
PNGRFLXADS1	\$ 20.85	\$ 11.29	\$ 0.40	\$ 32.53				
PNISFLXADS0	\$ 23.65	\$ 12.13	\$ 0.40	\$ 36.18				
PTCTFLXADS0	\$ 15.44	\$ 10.30	\$ 0.40	\$ 26.14				
SBNGFLXADS1	\$ 17.09	\$ 10.64	\$ 0.40	\$ 28.13				
SCPKFLXARS0	\$ 14.65	\$ 10.16	\$ 0.40	\$ 25.20				
SLHLFLXARS0	\$ 33.19	\$ 13.78	\$ 0.40	\$ 47.38				
SNANFLXARS0	\$ 37.68	\$ 14.95	\$ 0.40	\$ 53.03				
SNISFLXADS0	\$ 13.86	\$ 9.96	\$ 0.40	\$ 24.22				
SSPRFLXARS0	\$ 41.61	\$ 16.06	\$ 0.40	\$ 58.07				
STCDFLXADS0	\$ 22.81	\$ 11.79	\$ 0.40	\$ 34.99				
SVSPFLXARS0	\$ 24.12	\$ 12.10	\$ 0.40	\$ 36.62				
SVSSFLXARS0	\$ 18.67	\$ 11.24	\$ 0.40	\$ 30.31				
TLCHFLXARS0	\$ 37.97	\$ 15.37	\$ 0.40	\$ 53.74				
TVRSFLXADS0	\$ 15.95	\$ 10.47	\$ 0.40	\$ 26.82				
UMTLFLXARS0	\$ 45.15	\$ 16.52	\$ 0.40					
WCHLFLXADS0	\$ 36.70	\$ 14.65	\$ 0.40					
WLSTFLXARS0	\$ 49.89	\$ 17.42	\$ 0.40	The Agency of the State of the				
WLWDFLXARS0	\$ 27.16	\$ 13.04		\$ 67.71				
WNDRFLXARS0	\$ 14.26	\$ 10.20	0.10	\$ 40.61				
WNGRFLXADS0	\$ 17.09	\$ 10.64	VA.V	\$ 24.86				
WNPKFLXADS1	\$ 10.60	\$ 9.25	0.10	\$ 28.13				
ZLSPFLXARS0	\$ 59.32	\$ 18.82	2.00	\$ 20.25				
	3,32	10.02	5 0.40	\$ 78.55				

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GTE FLORIDA INC - CAPPED COST

Florida

	Monthly Cost per Line per Month					
Wire Center	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total		
ABDLFLXA96H	\$ 17.74	\$ 10.84	\$ 0.40	Cost \$ 28.98		
ALFAFLXA67H	\$ 17.87	\$ 10.74	0.40	CONTRACTOR OF THE PARTY OF THE		
ALTRFLXARSA	\$ 39.72	\$ 14.93	\$ 0.40			
ANMRFLXA77H	\$ 12.42	\$ 9.70	0.40	\$ 55.05		
BARTFLXA53H	\$ 16.95	\$ 10.50	\$ 0.40	\$ 22.52		
BAYUFLXA54H	\$ 12.84	\$ 9.76	\$ 0.40	\$ 27.85		
BBPKFLXARSA	\$ 28.51	\$ 12.93	0.40	\$ 23.00		
BHPKFLXA28H	\$ 7.19	\$ 8.66	0.40	\$ 41.84		
BRBAFLXA75H	\$ 13.41	\$ 9.86	0.40	\$ 16.25		
BRJTFLXARSA	\$ 46.81	\$ 15.49	0.10	\$ 23.67		
BRNDFLXA68H	\$ 13.99	\$ 9.96	0.40	\$ 62.70		
BRTNFLXX74H	\$ 15.21	\$ 10.18	0.40	\$ 24.35		
BYSHFLXA84H	\$ 13.68	\$ 10.24	0.40	\$ 25.79		
CLWRFLXADS0	\$ 10.45	\$ 9.24	0.40	\$ 24.32		
CNSDFLXA79H	\$ 11.66	\$ 9.45	0.40	\$ 20.09		
CRWDFLXA96H	\$ 12.82	\$ 9.70	0.40	\$ 21.50		
CYGRFLXA32H	\$ 16.45	\$ 10.59	0.40	\$ 22.92		
DNDNFLXA73H	\$ 12.41	\$ 9.70	0.40	\$ 27.44		
DUNDFLXA43H	\$ 23.50	\$ 12.07	0.10	\$ 22.51		
ENWDFLXA47H	\$ 17.42	\$ 10.72	0.40	\$ 35.97		
FHSDFLXARS0	\$ 11.23	\$ 9.43	0.40	\$ 28.53		
FRSTFLXA63H	\$ 30.98	\$ 13.47	0.10	\$ 21.06		
GNDYFLXA57H	\$ 10.29	\$ 9.28	0.40	\$ 44.84		
HDSNFLXA86H	\$ 16.64	\$ 10.57	0.40	\$ 19.97		
HGLDFLXA64H	\$ 14.75	\$ 10.12	0.40	\$ 27.60		
HNCYFLXA42H	\$ 19.25	\$ 11.03	0.40	\$ 25.26		
HNCYFLXN424	\$ 19.89	\$ 11.03	0.40	\$ 30.68		
HYPKFLXADS0	\$ 10.72	\$ 9.39		\$ 31.32		
NLKFLXARSA	\$ 61.31		0.40	\$ 20.51		
NRKFLXX59H	The state of the s		\$ 0.40			
CYSTFLXA92H				\$ 20.28		
GBKFLXA38H			A STATE OF THE STA	28.88		
KALFLXA95H	\$ 18.08		The second secon	20.65		
	0.00	\$ 10.80	\$ 0.40 !	29.28		

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GTE FLORIDA INC - CAPPED COST

Florida

	Monthly Cost per Line per Month								
Wire Center	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost					
LKLDFLXA68H	\$ 13.40	\$ 9.89	\$ 0.40	\$ 23.68					
LKLDFLXF.66H	\$ 16.31	\$ 10.35	\$ 0.40	\$ 27.00					
LKLDFLXN85H	\$ 18.28	\$ 10.83	\$ 0.40	\$ 29.52					
LKWLFLXA67H	\$ 18.81	\$ 11.00	\$ 0.40	\$ 30.21					
LKWLFLXERSA	\$ 38.20	\$ 14.25	\$ 0.40	\$ 52.85					
LLMNFLXADS0	\$ 13.39	\$ 9.92	\$ 0.40	\$ 23.71					
LNLKFLXA99H	\$ 24.98	\$ 11.86	\$ 0.40	\$ 37.24					
LRGOFLXA58H	\$ 12.11	\$ 9.59	\$ 0.40	\$ 22.10					
LUTZFLXA94H	\$ 14.79	\$ 10.21	\$ 0.40	\$ 25.40					
MLBYFLXARSA	\$ 20.07	\$ 11.44	\$ 0.40	\$ 31.91					
MNLKFLXA85H	\$ 18.15	\$ 10.86	\$ 0.40	\$ 29.41					
MYCYFLXA32H	\$ 58.09	\$ 17.40	\$ 0.40	\$ 75.89					
NGBHFLXA39H	\$ 12.89	\$ 9.75	\$ 0.40	\$ 23.04					
NPRCFLXA84H	\$ 14.77	\$ 10.07	\$ 0.40	\$ 25.24					
NRPTFLXA42H	\$ 17.50	\$ 10.82	\$ 0.40	\$ 28.72					
NRSDFLXA35H	\$ 14.33	\$ 10.00	\$ 0.40	\$ 24.73					
OLDSFLXA85H	\$ 12.47	\$ 9.53	\$ 0.40	\$ 22.40					
OSPRFLXA96H	\$ 12.87	\$ 9.82	\$ 0.40	\$ 23.10					
PKCYFLXARSA	\$ 32.37	\$ 13.38	\$ 0.40	\$ 46.15					
PLMTFLXA72H	\$ 17.28	\$ 10.60	\$ 0.40	\$ 28.28					
PLSLFLXA79H	\$ 13.89	\$ 9.87	\$ 0.40	\$ 24.16					
PNCRFLXA73J	\$ 27.19	\$ 12.84	\$ 0.40	\$ 40.43					
PNLSFLXADS0	\$ 11.75	\$ 9.44	\$ 0.40	\$ 21.58					
POINFLXARSA	\$ 34.54	\$ 13.43	\$ 0.40	\$ 48.37					
PRSHFLXARSA	\$ 49.89	\$ 16.31	\$ 0.40	Tales SIT THOU					
PSDNFLXA34H	\$ 13.75	\$ 9.87	\$ 0.40						
PTCYFLXA75H	\$ 19.33	\$ 11.12	\$ 0.40						
RSKNFLXA64H	\$ 20.23	\$ 11.24	\$ 0.40	\$ 30.85 \$ 31.87					
SARKFLXARSA	\$ 8.15	\$ 9.20	\$ 0.40						
SEKYFLXA34H	\$ 10.75	\$ 9.31	\$ 0.40						
SGBEFLXA36H	\$ 10.81	\$ 9.32	\$ 0.40	A STATE OF THE STA					
SKWYFLXADS0	\$ 13.63			\$ 20.53					
SLSPFLXA93H	\$ 13.18			\$ 24.09					
		0.00	\$ 0.40	\$ 23.43					

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GTE FLORIDA INC - CAPPED COST

Florida

	Monthly Cost per Line per Month							
Wire Center SMNLFLXA23H	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost				
	\$ 13.50	\$ 10.09	\$ 0.40	\$ 23.99				
SNSPFLXA37H	\$ 12.92	\$ 9.66	\$ 0.40	\$ 22.99				
SPBGFLXADS0	\$ 11.04	\$ 9.43	\$ 0.40	\$ 20.87				
SPBGFLXS86H	\$ 12.05	\$ 9.59	\$ 0.40	\$ 22.03				
SPRGFLXA37H	\$ 13.97	\$ 9.92	\$ 0.40	\$ 24.30				
SRSTFLXADS0	\$ 9.91	\$ 9.18	\$ 0.40	\$ 19.48				
SSDSFLXA92H	\$ 13.26	\$ 9.84	\$ 0.40	\$ 23.50				
STGRFLXA78H	\$ 11.83	\$ 9.55	\$ 0.40	\$ 21.78				
SWTHFLXADS0	\$ 11.84	\$ 9.54	\$ 0.40	\$ 21.78				
TAMPFLXEDS0	\$ 14.05	\$ 9.91	\$ 0.40	\$ 24.36				
TAMPFLXX27H	\$ 7.58	\$ 8.34	\$ 0.40	\$ 16.31				
THNTFLXADS0	\$ 21.38	\$ 11.47	\$ 0.40	\$ 33.25				
TMTRFLXADS0	\$ 11.86	\$ 9.65	\$ 0.40	\$ 21.90				
TRSPFLXA93H	\$ 14.88	\$ 10.13	\$ 0.40	\$ 25.41				
UNVRFLXA97H	\$ 9.89	\$ 9.17	\$ 0.40	THE RESERVE TO SERVE THE PARTY OF THE PARTY				
VENCFLXA48H	\$ 13.14	\$ 9.89	\$ 0.40	\$ 23.43				
VENCFLXSDS0	\$ 14.48	\$ 10.16	\$ 0.40	All the same and the				
WMMFLXA63H	\$ 19.71	\$ 10.95	S 0.40					
WLCHFLXA97H	\$ 15.88	\$ 10.24	\$ 0.40					
WLCRFLXA83H	\$ 12.56	\$ 9.73	3 \$ 0.40					
WNHNFLXC29H	\$ 14.90	\$ 10.14	S 0.40	Service Control of the Control of th				
WSSDFLXADS0	\$ 10.58	\$ 9.27	7 \$ 0.44	\$ 20.2				
YBCTFLXA24H	\$ 13.36	\$ 9.91	1 \$ 0.44	\$ 23.6				
ZPHYFLXA78H	\$ 17.15	\$ 10.68	B S 0.44	0 \$ 28.2				

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ALLTEL FLORIDA INC - CAPPED COST

Florida

	Monthly Cost per Line per Month								
Wire Center ALCHFLXARS1	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost					
	\$ 34.40	\$ 13.82	\$ 0.40	\$ 48.61					
BORAFLXARS1	\$ 128.25	\$ 31.87	\$ 0.40	\$ 160.52					
BRFRFLXARS1	\$ 47.16	\$ 16.20	\$ 0.40	\$ 63.76					
BRKRFLXADS0	\$ 78.13	\$ 22.99	\$ 0.40	\$ 101.52					
CITRFLXADS0	\$ 32.34	\$ 14.55	\$ 0.40	\$ 47.29					
CLHNFLXADS0	\$ 42.89	\$ 15.26	\$ 0.40	\$ 58.55					
CRCYFLXADS0	\$ 32.88	\$ 14.57	\$ 0.40	\$ 47.85					
DWPKFLXARS0	\$ 72.97	\$ 21.58	\$ 0.40	\$ 94.94					
FLRHFLXADS1	\$ 57.42	\$ 19.84	\$ 0.40	\$ 77.66					
FTWHFLXADS0	\$ 70.60	\$ 21.75	\$ 0.40	\$ 92.75					
HGSPFLXADS0	\$ 41.93	\$ 15.42	\$ 0.40	\$ 57.76					
HLRDFLXADS0	\$ 62.47	\$ 19.05	\$ 0.40	\$ 81.92					
HSNGFLXADS0	\$ 52.06	\$ 17.60	\$ 0.40	\$ 70.00					
INTRFLXADS0	\$ 54.21	\$ 18.30	\$ 0.40	\$ 72.91					
JNGSFLXARS1	\$ 89.78	\$ 24.25	\$ 0.40	\$ 114.42					
JSPRFLXARS1	\$ 33.55	\$ 13.82	\$ 0.40	\$ 47.77					
LKBTFLXADS0	\$ 41.63	\$ 15.20	\$ 0.40	\$ 57.23					
LRVLFLXARS1	\$ 104.23	\$ 27.64	\$ 0.40	\$ 132.27					
LVOKFLXADS0	\$ 25.97	\$ 12.16	\$ 0.40	\$ 38.53					
MAYOFLXARS1	\$ 88.18	\$ 23.41	\$ 0.40	\$ 111.99					
MCINFLXADS0	\$ 47.45	\$ 16.95	\$ 0.40	\$ 64.80					
MLRSFLXADS0	\$ 22.50	\$ 12.16	\$ 0.40	\$ 35.07					
ORSPFLXADS0	\$ 69.45	\$ 21.19	\$ 0.40	\$ 91.04					
RAFRFLXARS1	\$ 49.97	\$ 17.31	\$ 0.40	\$ 67.68					
WALDFLXADS0	\$ 51.87	\$ 17.68	\$ 0.40	\$ 69.96					
WHSPFLXARS1	\$ 66.23	\$ 18.84	\$ 0.40	\$ 85.47					
WLBRFLXADS0	\$ 101.26	\$ 27.00	\$ 0.40	\$ 128.66					

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FLORALA TEL CO - FL - CAPPED COST

Florida

		Monthly Cost per Line per Month								
Wire Center LRHLFLXADS0		Capital Cost			White Pages Directory		Total Cost			
	S	109.27	S	29.63		0.40	2	139.31		
PXTNFLXADS0	S	89.80	S	24.56	S	0.40		114.76		

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FRONTIER COMM OF THE SOUTH INC. - CAPPED COST

Florida

		Monthly Cost per Line per Month									
Wire Center MOLNFLXADS0	Capital Cost		Operating Expense				Total Cost				
	\$	38.76	\$	15.23		0.40	•	54.39			
WLHLFLXADS0	\$	87.25	\$	23.53	\$	0.40	3	111.18			

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GULF TEL CO - CAPPED COST

Florida

	Monthly Cost per Line per Month							
Wire Center	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost				
PRRYFLXADS0	\$ 43.13	\$ 15.31	\$ 0.40	\$ 58.84				

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INDIANTOWN TEL SYSTEM - CAPPED COST

Florida

		Monthly Cost	per Line per Month		
Wire Center	Capital Cost			Total Cost	
INTWFLXADS0	\$ 36.72	\$ 14.06	\$ 0.40	\$ 51.18	

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NORTHEAST FLORIDA TEL CO INC - CAPPED COST

Florida

	Monthly Cost per Line per Month								
Wire Center MCLNFLXADS0	Capital Cost	Operating Expense	White Pages Directory Listing Expense	Total Cost					
	\$ 30.20	\$ 13.24		\$ 43.93					
SNSNFLXARS0	\$ 105.90		0.70	\$ 134.09					

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QUINCY TEL CO - CAPPED COST

Florida

	Monthly Cost per Line per Month								
Wire Center	Capital Cost		Operating Expense	White Pages Directory Listing Expense		Total Cost			
GNBOFLXARS0	\$ 69.2	8 5	20.72		0.40	2	90.40		
GRETFLXARS0	\$ 77.9	2 5	23.17	S	0.40	\$	101.49		
QNCYFLXADS0	\$ 26.3	4 5	The state of the s	\$	0.40	S	39.08		

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ST JOSEPH TEL TEL CO - CAPPED COST

Florida

Wire Center ALTHFLXADS0	Monthly Cost per Line per Month									
	Capital Cost		Operating Expense		White Pages Directory Listing Expense		Total Cost			
	\$	72.60	S	21.45	\$	0.40	2			
APLCFLXADS0	S	24.60	S	12.77	2	0.40	1	94.45		
ARPNFLXARS0	S	61.91	S	18.86	2		2	37.78		
BLTWFLXADS0	S	52.79	S	17.50	S	0.40	2	81.17		
BRSTFLXADS0	S	67.76	2	20.00	S	0.40	5	70.70		
CHTHFLXADS0	S	21.63	S	11.89	S	0.40	5	88.17		
CRBLFLXADS0	S	36.00	2	14.47	\$	0.40	5	33.93		
ESPNFLXADS0	S	40.12	\$	14.55	\$	0.40	5	50.87		
HSFRFLXARS0	2	77.32	S	22.41	S	0.40	5	55.07		
PTSJFLXADS0	S	34.41	2	13.59	S	0.40	5	100.13		
TAFBFLXADS0	S	27.90	S			0.40	S	48.40		
THBHFLXADS0	2	14.52	The Court	13.59	S	0.40	S	41.89		
WWHTFLXADS0		The second second	S	10.57	S	0.40	S	25.48		
" WHITLANSO	S	53.95	S	17.95	S	0.40	S	72.29		

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ATTACHMENT A

VISTA-UNITED TELECOMMUNICATIONS SYS - CAPPED COST

Florida

			Mon	thly Cost	per Line	per Month		
Wire Center	Capital Cost				White Pages Directory Listing Expense		Total Cost	
LKBNFLXBDS0	S	7.02	S	8.16		0.40	2	15.58