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RECORDS AND REPORTING
December 6, 2009

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

Re: Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayo:

Enclosed for filing in the above dockets are the original and fifteen (15) copies of Sprint's Motion to Accept Supplemental Rebuttal Testimony of Michael R. Hunsucker.

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

Thank you for your assistance in this matter.

Sincerely,

Susan S. Masterton

Susan S. Masterton

Enclosures

cc: Parties of Record

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- APP _____
- CAF _____
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14889 DEC-6 09

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CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & DOCKET NO. 990321-TP

I HEREBY CERTIFY that a true and correct copy of the Motion To Accept Supplemental Rebuttal Testimony of Michael R. Hunsucker, was served by Over-night mail this 6th day of December, 1999 or hand-delivery on the 7th day of December, 1999 to the following:

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Andrew Isar
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Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

MICHAEL R. HUNSUCKER

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Q. Please state your name and business address.

A. My name is Michael R. Hunsucker. I am employed by Sprint/United Management Company as Director-Regulatory Policy. My business address is 4220 Shawnee Mission Parkway, Fairway, Kansas, 66205.

Q. Are you the same Michael R. Hunsucker that presented direct testimony and rebuttal testimony in this case?

A. Yes, I am.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present rebuttal testimony on the revisions to the direct testimony of Mr. John W. Ries on behalf of GTE Florida, Incorporated. Specifically, I will address issues related to GTE's proposal to file a tariff for costs associated with site

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1 modification, HVAC and power modification, and security
2 and electrical requirements.

3

4 **Q. Does Sprint generally agree with tariffing of**
5 **collocation charges?**

6

7 A. Yes, in the direct testimony of Melissa Closz, on behalf
8 of Sprint (page 22, lines 7-17), she proposes the
9 tariffing of collocation charges. Tariffing of
10 collocation charges results in benefits to both the ALEC
11 and the ILEC in terms of efficiency and certainty.

12

13 **Q. What does GTE propose relative to the development of a**
14 **tariffed rate for space preparation costs?**

15

16 A. Mr. Ries, on page 19, lines 3-9 states that "The rate
17 will be based upon information from past collocation
18 activity. The relevant types of costs associated with
19 collocation arrangements over a period of time will be
20 summed and then divided by the total number of
21 collocations over that same period of time. Some of
22 these would have had these costs associated with them
23 and some would not. The resulting rate will be one that
24 can be applied to every collocation request in the
25 future."

1 Q. What general observations do you have regarding their
2 proposed cost development and subsequent tariffed rate?

3

4 A. First, GTE references "relevant types of costs" would be
5 developed based on history without any explanation of
6 what these "relevant" costs are. It is impossible to
7 determine whether these costs are "relevant" without
8 first knowing what the costs are. Sprint can make no
9 concrete determination of the appropriateness of these
10 costs absent a cost showing containing sufficient detail
11 to make such determination.

12

13 Secondly, GTE appears to be using the number of
14 collocators as the basis for the determination and
15 subsequent allocation of these costs to ALECs. In GTE's
16 proposed methodology, it appears that none of these
17 costs will be allocated to GTE. Again, without having
18 sufficient information to understand the costs GTE will
19 include in the numerator, there is a potential that
20 these space preparation charges could be beneficial to
21 both the ALEC and GTE but GTE proposes to recover 100%
22 of the costs from ALECs only. Also, as discussed in my
23 original rebuttal testimony, this does not appropriately
24 allocate the costs between ILECs and ALECs as specified
25 in the FCC's first Report & Order in Docket No. 98-147.

1 In fact, GTE recognizes that these costs are not
2 dependent on the number of collocators. Mr. Ries states
3 on page, 18, lines 14-16, that "Many of the fixed costs
4 associated with collocation space preparation do not
5 depend on the number of competitors that ultimately
6 occupies the space...". If these costs are not dependent
7 on the number of competitors, then why should these
8 costs be developed and allocated based on the number of
9 competitors.

10

11 Lastly, Mr. Ries states that the resulting rate will be
12 applied to all collocation requests, regardless of
13 whether costs are actually incurred at a particular
14 location. The fundamental issue here is whether GTE
15 should be allowed to arbitrarily increase the cost of
16 all collocations in all locations without actually
17 incurring the costs associated with the space
18 preparation. Again, having not seen the GTE tariff and
19 supporting cost study, it is impossible to determine the
20 relative impact that such a pricing policy could have on
21 the development of local competition.

22

23 **Q. Does this conclude your testimony?**

24

25 **A. Yes, it does.**