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May 18, 2000

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

Re: Docket No. 990649-TP
Investigation into Pricing of Unbundled Network Elements

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and fifteen copies of certain revised/corrected pages to GTE Florida Incorporated's Nonrecurring Cost Study and Direct Testimonies/Exhibits of Linda Casey and Dennis B. Trimble. A list of the exact pages noting the revisions/corrections and the reason for the changes is also enclosed as Attachment A. Please replace the original pages (filed May 1, 2000) with the enclosed revised pages.

Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

- AFA _____
- APP _____
- CAF _____
- CMU _____
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- EAG _____
- LEG _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via U.S. mail on May 18, 2000 to the parties on the attached list.



our Kimberly Gaswell

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ATTACHMENT A

NRC study corrected pages:

Binder 1, Tab 2, p. 2-FL23

Binder 2, Tab A2, p. A2-FL24, pp. A2-FL70 through A2-FL72

These pages were revised to correct data used to calculate Capital Factor versus the Total Annual Charge Factor in worksheets to compute the annualized costs for the capitalized NOMC Shared/Fixed Costs. The Composite Income Tax Factor and Property Tax Factor were erroneously excluded from the original cost study calculations.

Binder 1, Tab 1, p. 1-FL57 - changes were made to all dollar amounts for Combinations (six figures plus four totals)

Casey corrected pages:

Testimony:

Page 6, lines 11 and 19 - \$17 million changed to \$19 million (revised NOMC shared/fixed cost)

Page 6, lines 14 and 16 - \$5.53 changed to \$6.16 (revised NOMC shared/fixed cost)

Trimble corrected pages:

Testimony:

Page 20, line 12 - \$5.53 changed to \$6.16 (revised NOMC shared/fixed cost)

Page 26, line 23 - reference corrected to Exhibit DBT-2

Page 26, line 6 - \$5.53 changed to \$6.16 (revised NOMC shared/fixed cost)

Page 26, line 21 - \$38.13 changed to \$38.75 (revised NOMC shared/fixed cost)

Exhibits:

DBT-1, p. 1 - all cross-references were corrected to DBT-1

DBT-1, p. 2 - all figures on lines 10 and line 17 were overstated by the NID and have been revised to conform with FCC rules. These changes do not affect costs.

DBT-2, pp. 1,2,5,6,8,9,10 – ordering prices changed (first two columns)
(revised NOMC shared/fixed cost)

DBT-2, p. 15 – NOMC total dollars and rate changed (revised NOMC shared/fixed cost)

DBT-3, p. 2 - line 12 – calculation corrected to 10 * 12

DBT-3, p. 2 - line 16 – calculation corrected to 14 * 15

DBT-3, p. 2 - line 18 – calculation corrected to 12 * 16

DOCUMENT NUMBER-DATE

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-FPSC-RECORDS/REPORTING

GTE - Florida
 Wholesale Non-recurring Cost Study
 Ordering
 Summary of Costs

Description	Source	Annual Cost	Destination
NOMC Shared/Fixed Costs		A=Source	
	AOIS-20	\$18,800,610.91	SUM-40

Revised

GTE - Florida
 Wholesale Non-recurring Cost Study
 Ordering
 Ordering Inputs

Description	Source	Manual	Semi-	Mechanized	LLR per	Annual Costs	Destination
		Minutes per Order	Mechanized	Minutes per Order	Minute		
		A=Source	B=Source	C=Source	D=AOLR-1		
NOMC Shared/Fixed Costs	ASFC-2					\$18,800,610.91	ORS-16

Revised

GTE - Florida
Wholesale Non-recurring Cost Study
Ordering
NOMC Shared/Fixed Costs

Description	Per Center	Total Cost for	Annual Cost	Annual Cost	Destination
	Cost	All NOMCs	Factor		
	A=Note 1	B=A*3	C=ACCF-1	D=B*C	
Recurring Nonlabor Expense					
Rent Expense	\$800,000	\$2,400,000	n/a	\$2,400,000.00	
ACD Maintenance Contract	\$100,290	\$300,870	n/a	\$300,870.00	
INS Circuit Charges	\$715,200	\$2,145,600	n/a	\$2,145,600.00	
Implementation Nonlabor Costs					
Facility Expansion	\$681,000	\$2,043,000	0.19552	\$399,455.99	
Furniture & Fixtures	\$1,516,000	\$4,548,000	0.22613	\$1,028,453.74	
Support Assets/LAN/SIGS	\$472,600	\$1,417,800	0.33628	\$476,783.79	
ACD/IVRU	\$37,500	\$112,500	0.33628	\$37,831.98	
Scheduling System	\$25,000	\$75,000	0.33628	\$25,221.32	
Recruiting	\$320,000	\$960,000	n/a	\$960,000.00	
Relocations	\$275,000	\$825,000	n/a	\$825,000.00	
Other Implementation Cost	\$15,000	\$45,000	n/a	\$45,000.00	
Ordering Center Capital Requirements					
LAN / SIGS Implementation	\$1,212,900	\$3,638,700	0.33628	\$1,223,637.46	
PCs for Staff	\$1,828,000	\$5,484,000	0.33628	\$1,844,182.76	
ACD / IVRU	\$1,059,766	\$3,179,298	0.33628	\$1,069,147.81	
Scheduling System	\$250,000	\$750,000	0.33628	\$252,213.18	
Facilities Expansion	\$3,600,000	\$10,800,000	0.19552	\$2,111,661.63	
Furniture & Fixtures	\$517,500	\$1,552,500	0.22613	\$351,071.77	

Revised

GTE - Florida
 Wholesale Non-recurring Cost Study
 Ordering
 NOMC Shared/Fixed Costs

Description	Per Center Cost	Total Cost for All NOMCs	Annual Cost Factor	Annual Cost	Destination
	A=Note 1	B=A*3	C=ACCF-1	D=B*C	
NOMC Support					
Support and Administration Labor	\$988,384	\$2,965,152	n/a	\$2,965,152.00	
Support and Administration Nonlabor	\$84,525	\$253,575	n/a	\$253,575.00	
Support and Administration PCs	\$85,000	\$255,000	0.33628	\$85,752.48	
Total				<u>\$18,800,610.91</u>	AOIS-20

Note 1: Provided by NOMC Staff Support personnel.

Revised

GTE - Florida
 Wholesale Non-recurring Cost Study
 Ordering
 Capital Cost Factors

Description	Composite				Destination
	Capital Factor	Income Tax Factor	Property Tax Factor	Total Annual Charge Factor	
	A=Note 1	B=Note 1	C=Note 1	D=A+B+C	
Account					
212100 Buildings	0.12932	0.05487	0.01133	0.19552	ASFC-1
212200 Furniture	0.18236	0.03244	0.01133	0.22613	ASFC-1
212400 Computers	0.28249	0.04246	0.01133	0.33628	ASFC 1,2

Note 1: Provided by Financial Group personnel.

Revised

GTE - Florida
Wholesale Non-recurring Cost Study
Loop Conditioning
Summary of Cost

Description	Total Cost	
	Initial	Additional
Bridged Tap Removal		
One Occurrence	\$911.76	\$19.93
Multiple Occurrences	\$1,274.26	\$49.83
Load Coil Removal		
Load Coil Removal Only	\$1,448.22	
Combinations		
Bridged Tap (One) and Load Coil		
Bridged Tap	\$911.76	\$19.93
Load Coil	\$797.92	
Total	\$1,709.68	\$19.93
Bridged Tap (Multiple) and Load Coil		
Bridged Tap	\$1,274.26	\$49.83
Load Coil	\$797.92	
Total	\$2,072.18	\$49.83

Revised

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Piercing of) Docket No. 990649-TP
Unbundled Network Elements, Phase II)

DIRECT TESTIMONY OF

LINDA CASEY

ON BEHALF OF:

GTE FLORIDA INCORPORATED

SUBJECT: NRC COST STUDIES

May 1, 2000

1 the non-recurring costs. This approach is based on established
2 principles of cost causation, and ensures that CLECs bear the costs
3 they cause – no more and no less.

4
5 Second, GTE developed separate non-recurring costs to capture the
6 significant non-volume sensitive or *non-variable costs* incurred in
7 fulfilling and provisioning CLEC orders. These include the cost of the
8 computers used by the customer service representatives and the cost
9 of the land and buildings for the NOMCs, where the orders are sent
10 to be processed. GTE calls these the “NOMC Shared/Fixed Costs,”
11 which equal approximately \$19 million per year. The support for
12 these costs, and the assumptions used to annualize them, are set
13 forth in GTE’s Non-recurring Cost Study [Exhibit LC-1]. GTE
14 proposes to recover these costs through a separate NRC of \$6.16 per
15 order. For example, a CLEC that orders a two-wire loop will be
16 charged an additional incremental NRC of \$6.16. GTE witness
17 Dennis Trimble explains how this NRC was developed based on
18 estimated demand; my testimony supports the total annual cost of
19 \$19 million.

20

21 **Q. WHAT COST MODEL PRINCIPLES DID GTE EMPLOY IN**
22 **COMPLETING ITS NON-RECURRING COST STUDY?**

23 A. Pursuant to current FCC pricing standards, GTE’s non-recurring cost
24 studies are based on the TELRIC standard. The TELRIC of a service
25 is the amount by which a company’s total costs will increase in the

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into Pricing)
Unbundled Network Elements, Phase II) Docket 990649-TP
)

DIRECT TESTIMONY OF

DENNIS B. TRIMBLE

On Behalf of

GTE FLORIDA INCORPORATED

SUBJECT: POLICY

May 1, 2000

1 time needed to process different types of CLEC orders. A CLEC that
2 places an order for a simple two-wire loop will incur a lower NRC than a
3 CLEC that places a more complicated order requiring special engineering
4 studies or a special network configuration. Ms. Casey explains how GTE
5 studied the different activities associated with different types of CLEC
6 requests to produce four separate categories of CLEC orders.

7
8 GTE's NRCs also reflect recovery of a portion of GTE's annual
9 shared/fixed costs. Specifically, whenever a CLEC places an order or
10 initiates an activity involving GTE's National Open Market Centers
11 (NOMCs), the rate the CLEC pays for "ordering" activity includes a
12 shared/fixed recovery amount of \$6.16. As I discuss later in my
13 testimony, this charge is based on an estimate of how many times
14 CLECs will use GTE's NOMCs in a year. For example, if the total annual
15 fixed costs equal \$150, and if CLECs were expected to contact GTE's
16 NOMCs a total of 100 times a year, then the "ordering" NRC would
17 include \$1.50 for recovery of shared/fixed NOMC costs. CLECs who
18 rarely (or never) use GTE's NOMC will pay very little (or nothing).

19
20 GTE's proposed shared/fixed amount, which is added to each "ordering"
21 NRC, acts to spread recovery of the "fixed / shared" costs of the NOMCs
22 over time and thus allows CLECs to pay for this cost in installments. If
23 the Commission disagrees with this rate structure, then GTE must be
24 able to recover all its costs through some other mechanism (e.g., a non-
25 bypassable surcharge on all CLEC bills or all end-user bills, or a one-time

1 GTE's shared/fixed costs were developed based on the costs GTE
2 actually incurred, as described in GTE's NRC Study. GTE proposes to
3 recover these costs through an additional amount included in the NRC
4 rate assessed on every CLEC order. Specifically, whenever a CLEC
5 places an order or initiates an activity involving GTE's NOMCs, the
6 CLEC's "ordering" NRC includes \$6.16 for recovery of shared/fixed
7 NOMC costs. This amount is based on an estimate of how many times
8 CLECs will use GTE's NOMCs in a year. The assumptions and
9 calculations supporting this charge are included in Exhibit DBT-2, page
10 15.

11

12 Again, these variable and shared/fixed costs are reflected in the
13 "ordering" and "provisioning" NRCs shown on Exhibit DBT-2, pages 1 -
14 4.

15

16 **Q. PLEASE PROVIDE AN EXAMPLE OF THE NRCS LISTED ON EXHIBIT**
17 **DBT-2.**

18 A. Please refer to page 1 of Exhibit DBT-2, which shows the ordering and
19 provisioning NRCs applicable to an initial order for an "Exchange-basic"
20 two-wire loop. The total cost of ordering this facility (using manual
21 method) is \$38.75, and GTE's proposed NRC equals this cost (as noted
22 above, GTE does not mark-up its NRCs). As shown on page 5 of Exhibit
23 DBT-2, this cost includes the variable costs associated with this order
24 plus a share of the NOMC fixed costs.

25

Revised

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-1
FPSC Exhibit _____
May 1, 2000
Page 1 of 7

GTE FLORIDA, INC.
DOCKET NO. 990649-TP
UNBUNDLED NETWORK ELEMENTS
DESCRIPTION, RATE & EXHIBIT LOCATION

DESCRIPTION	RATE	ATTACHMENT, PAGE, LINE NO.
1) 2-wire voice grade loop	\$28.41	Exhibit DBT-1, Page 2, Line 3, Column c
2) 4-wire analog loop	\$62.20	Exhibit DBT-1, Page 2, Line 10, Column c
3) 2-wire ISDN/IDSL loop	\$28.41	See Footnote 1
4) 2-wire xDSL-capable loop	\$28.41	See Footnote 1
5) 4-wire xDSL-capable loop	\$62.20	See Footnote 1
6) 4-wire 56 kbps loop	\$62.20	See Footnote 1
7) 4-wire 64 kbps loop	\$62.20	See Footnote 1
8) DS-1 loop	\$223.23	Exhibit DBT-1, Page 2, Line 20, Column c
9) high capacity loops (DS3 and above)	\$1,208.03	Exhibit DBT-1, Page 2, Line 21, Column c
10) dark fiber loop	TBD	To be Filed June, 2000
11) subloop elements	TBD	To be Filed June, 2000
12) network interface devices	\$0.90	Exhibit DBT-1, Page 2, Line 35, Column c
13) circuit switching (where required)	Various	See Footnote 2
14) packet switching (where required)	n/a	Not Required.
15) shared interoffice transmission	Various	Exhibit DBT-1, Page 3, Lines 67-70, Column c
16) dedicated interoffice transmission	Various	Exhibit DBT-1, Page 3, Lines 56-61, Column c
17) dark fiber interoffice facilities	TBD	To be Filed June, 2000
18) signaling networks and call-related databases	Various	Exhibit DBT-1, Page 3, Lines 81-102, Column c
19) OS/DA (where required)	n/a	GTE offers customized routing, therefore OS/DA is not required

Footnotes:

1) May require loop conditioning.

2) Circuit Switching includes the following:

Ports

Various

Exhibit DBT-1, Page 2, Lines 40-43, Column c

Local Central Office Switching

\$0.0026691

Exhibit DBT-1, Page 2, Line 46, Column c

Features

Various

Exhibit DBT-1, Pages 4-7, Column c

Revised

Docket No. 990649-TP
 Direct Testimony of Dennis B. Trimble
 Exhibit DBT-1
 FPSC Exhibit _____
 May 1, 2000
 Page 2 of 7

GTE Florida, Inc.
Docket No. 990649-TP
Unbundled Network Elements
TELRICs

**Fixed
 Allocator**

18.1% (d)

Unbundled Elements / Services	(a) TELRIC / 1		(b) = (a) * (d) Common	(c)=(a)+(b) Proposed
	\$/line/month	\$/minute	Cost Recovery	Rates
1 (1) LOCAL LOOPS				
2 <u>Local Loop (excludes NID)</u>				
3 2-Wire Voice Grade Loop	\$24.06		\$4.35	\$28.41
4				
5 Deaveraged Rates for 2-Wire				
6 Zone 1	\$20.72		\$3.75	\$24.47
7 Zone 2	\$27.42		\$4.96	\$32.38
8 Zone 3	\$49.93		\$9.04	\$58.97
9				
10 4-wire Voice Grade Loop	\$51.54		\$9.33	\$60.87
11				
12 Deaveraged Rates for 4-Wire				
13 Zone 1	\$43.85		\$7.93	\$51.78
14 Zone 2	\$60.28		\$10.91	\$71.19
15 Zone 3	\$93.97		\$17.01	\$110.98
16				
17 ISDN BRI Loop	\$28.90		\$5.23	\$34.13
18				
19 <u>High Capacity Loops (includes NID)</u>				
20 DS-1 Loop	\$189.02		\$34.21	\$223.23
21 DS-3 Loop	\$1,022.89		\$185.14	\$1,208.03
22				
23 Deaveraged Rates for DS-1 Loop				
24 Zone 1	\$175.04		\$31.68	\$206.72
25 Zone 2	\$198.77		\$35.98	\$234.75
26 Zone 3	\$364.95		\$66.06	\$431.01
27				
28 Deaveraged Rates for DS-3 Loop (see Line 21, Column c for rate)				
29 Zone 1	\$1,009.60			
30 Zone 2	\$1,032.56			
31 Zone 3	\$1,092.35			
32				
33				
34 (2) NETWORK INTERFACE DEVICE				
35 Basic NID	\$0.76		\$0.14	\$0.90
36				
37				
38 (3) LOCAL SWITCHING				
39 <u>Ports *</u>				
40 Basic Analog Line Side Port	\$2.73		\$0.49	\$3.22
41 ISDN BRI Digital Line Side Port	\$11.43		\$2.07	\$13.50
42 DS-1 Digital Trunk Side Port	\$59.80		\$10.82	\$70.62
43 ISDN PRI Port	\$189.99		\$34.39	\$224.38
44				
45 <u>Local Central Office Switching (Must Purchase Port)</u>				
46 Originating / Terminating MOU	\$0.0022600		\$0.0004091	\$0.0026691
47				
48 <u>Features</u>				
49 Various				Schedule 2
50				
51 * Centrex and PBX services use existing 2 Wire port or DS1 port type				
52				

**GTE FLORIDA
WHOLESALE NRC RATE SUMMARY
Revised**

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-2
FPSC Exhibit _____
May 1, 2000
Page 1 of 15

LOCAL WHOLESALE SERVICES	Ordering		Provisioning	
	100% Manual	Semi- Mech.	Initial Unit	Addt'l Unit
UNBUNDLED LOOP				
Exchange - Basic - Initial	38.75	27.60	42.17	38.81
Exchange - Basic - Subsequent	17.44	12.55	14.49	13.53
Exchange - Complex Nondigital - Initial	40.56	25.03	107.58	26.61
Exchange - Complex Nondigital - Subsequent	18.87	13.98	14.49	13.53
Exchange - Complex Digital - Initial	40.56	25.03	96.76	26.53
Exchange - Complex Digital - Subsequent	18.87	13.98	14.49	13.53
Advanced - Basic - Initial (DS0)	36.18	25.03	573.73	202.79
Advanced - Complex - Initial (DS1/DS3)	40.56	25.03	569.13	303.39
UNBUNDLED PORT				
Exchange - Basic - Initial	33.04	21.89	31.29	29.38
Exchange - Basic - Subsequent (Port Feature)	19.78	14.89	1.14	1.14
Exchange - Basic - Subsequent (CO Interconnection)	19.78	14.89	14.49	13.53
Exchange - Complex Nondigital - Initial	43.54	28.01	75.32	38.01
Exchange - Complex Nondigital - Subsequent (Port Feature)	25.90	21.01	6.23	6.23
Exchange - Complex Nondigital - Subsequent (Switch Feature Group)	30.28	21.01	23.06	-
Exchange - Complex Nondigital - Subsequent (CO Interconnection)	25.90	21.01	14.49	13.53
Exchange - Complex Digital - Initial	43.54	28.01	129.72	32.97
Exchange - Complex Digital - Subsequent (Port Feature)	25.90	21.01	5.45	5.45
Exchange - Complex Digital - Subsequent (Switch Feature Group)	30.28	21.01	23.06	-
Exchange - Complex Digital - Subsequent (CO Interconnection)	25.90	21.01	14.49	13.53
UNBUNDLED NID				
Exchange - Basic	27.06	18.83	33.99	n/a
LOOP CONDITIONING				
Exchange - Bridged Tap Removal - One Occurrence	n/a	n/a	911.76	19.93
Exchange - Bridged Tap Removal - Multiple Occurrences	n/a	n/a	1,274.26	49.83
Exchange - Load Coil Removal Only	n/a	n/a	1,448.22	-
Exchange - Bridged Tap (One) and Load Coil	n/a	n/a	1,709.68	19.93
Exchange - Bridged Tap (Multiple) and Load Coil	n/a	n/a	2,072.18	49.83
INTERIM NUMBER PORTABILITY (INP)				
Exchange - Initial	37.31	27.65	10.70	10.70
Exchange - Subsequent	23.05	19.65	4.91	4.91

GTE FLORIDA
WHOLESALE NRC RATE SUMMARY
Revised

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-2
FPSC Exhibit _____
May 1, 2000
Page 2 of 15

NETWORK WHOLESALE SERVICES	Ordering		Provisioning	
	100% Manual	Semi- Mech.	Initial Unit	Addt'l Unit
DEDICATED TRANSPORT				
Advanced - Basic - Initial	95.49	63.01	428.58	n/a
Advanced - Basic - Subsequent	45.12	28.77	58.20	n/a
Advanced - Complex - Initial	105.04	72.56	584.49	n/a
Advanced - Complex - Subsequent	45.12	28.77	86.80	n/a
SIGNALING SYSTEM 7 (SS7)				
Facilities and Trunks - Initial	237.67	205.19	568.54	n/a
Facilities and Trunks - Subsequent (with Engineering Review)	71.58	55.23	213.12	n/a
Facilities and Trunks - Subsequent (w/o Engineering Review)	71.58	55.23	67.28	n/a
Trunks Only - Initial	126.13	93.65	505.41	n/a
Trunks Only - Subsequent (with Engineering Review)	49.46	33.11	202.03	n/a
Trunks Only - Subsequent (w/o Engineering Review)	49.46	33.11	67.28	n/a
STP Ports (SS7 Links)	237.67	205.19	438.81	n/a
Entrance Facility/Dedicated Transport DS0 - Initial	95.49	63.01	390.08	n/a
Entrance Facility/Dedicated Transport DS0 - Subsequent	45.12	28.77	58.20	n/a
Entrance Facility/Dedicated Transport DS1/DS3 - Initial	105.04	72.56	515.03	n/a
Entrance Facility/Dedicated Transport DS1/DS3 - Subsequent	45.12	28.77	86.80	n/a

GTE FLORIDA
WHOLESALE NRC RATE ELEMENT DETAIL
Revised

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-2
FPSC Exhibit
May 1, 2000
Page 5 of 15

UNBUNDLED LOOP	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Addtl Unit			
	100% Manual	Semi-Mech	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange-Basic-New	20.26	13.74					7.90	8.63	18.97	33.51	7.90	5.67	17.48	31.04
Exchange-Basic-Disconnect	9.90	9.98					5.32	3.13	0.21	8.66	5.32	2.17	0.28	7.77
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Initial	38.75	27.60					13.22	9.76	19.19	42.17	13.22	7.85	17.75	38.81
Exchange-Basic-Change CO Interconnection	8.85	5.67					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Subsequent	17.44	12.56					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Nondigital-New	22.85	11.95					7.83	6.83	84.34	98.81	7.83	5.67	5.96	19.47
Preordering	1.49	-												
Record Order	0.95	0.72												
Exchange-Complex Nondigital-Disconnect	9.12	6.20					4.95	3.13	0.69	8.78	4.95	2.17	0.02	7.14
Preordering	-	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Initial	40.56	25.03					12.78	9.76	85.04	107.58	12.78	7.85	5.96	28.61
Exchange-Complex Nondigital-Change CO Interconnection	10.28	7.10					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent	18.87	13.98					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Digital-New	22.85	11.95					8.37	6.83	72.99	87.99	8.37	5.67	5.18	19.20
Preordering	1.49	-												
Record Order	0.95	0.72												
Exchange-Complex Digital-Disconnect	9.12	6.20					5.14	3.13	0.50	8.77	5.14	2.17	0.01	7.33
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Initial	40.56	25.03					13.51	9.76	73.49	96.76	13.51	7.85	6.17	26.53
Exchange-Complex Digital-Change CO Interconnection	10.28	7.10					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent	18.87	13.98					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Advanced-Basic-New	18.47	11.95					60.66	15.71	349.11	425.48	43.32	14.75	32.78	90.84
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Advanced - Basic - Initial (DS0)	36.18	25.03					60.66	15.71	349.11	425.48	43.32	14.75	32.78	90.84
Advanced-Complex Digital-New	22.85	11.95					116.22	15.71	295.32	427.25	98.89	14.75	31.02	144.66
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Advanced - Complex - Initial (DS1/DS3)	40.56	25.03					170.27	18.84	360.02	569.13	135.59	16.53	160.89	303.39

OTE FLORIDA
WHOLESALE NRC RATE ELEMENT DETAIL
Revised

Docket No. 990849-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-2
FPSC Exhibit
May 1, 2000
Page 6 of 15

UNBUNDLED PORT	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi-Mech	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange-Basic-New	17.85	11.33					11.75	6.63	-	18.38	11.75	5.67	-	17.42
Exchange-Basic-Disconnect	6.60	3.68					9.78	3.13	-	12.91	9.78	2.17	-	11.95
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Initial	33.04	21.89					21.53	9.76	-	31.29	21.53	7.85	-	29.38
Exchange-Basic-Change Port Feature	17.85	8.01					1.14	-	-	1.14	1.14	-	-	1.14
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Subsequent (Port Feature)	19.78	14.89					1.14	-	-	1.14	1.14	-	-	1.14
Exchange-Basic-Change CO Interconnection	17.85	8.01					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Subsequent (CO Interconnection)	19.78	14.89					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Nondigital-New	28.35	17.45					33.87	6.63	-	40.50	16.50	5.67	-	22.17
Exchange-Complex Nondigital-Disconnect	8.60	3.68					31.68	3.13	-	34.82	13.67	2.17	-	15.84
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Initial	43.54	28.01					65.56	9.76	-	75.32	30.16	7.85	-	38.01
Exchange-Complex Nondigital-Change Port Feature	17.31	14.13					6.23	-	-	6.23	6.23	-	-	6.23
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent (Port Feature)	25.90	21.01					6.23	-	-	6.23	6.23	-	-	6.23
Exchange-Complex Nondigital-Change Switch Feature Group	21.69	14.13					23.06	-	-	23.06	-	-	-	-
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent (Switch Feature Group)	30.28	21.01					23.06	-	-	23.06	-	-	-	-
Exchange-Complex Nondigital-Change CO Interconnection	17.31	14.13					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent (CO Interconnection)	25.90	21.01					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Digital-New	28.35	17.45					59.76	6.63	-	66.39	12.94	5.67	-	16.61
Exchange-Complex Digital-Disconnect	8.60	3.68					30.20	3.13	-	33.33	12.16	2.17	-	14.35
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Initial	43.54	28.01					119.96	9.76	-	129.72	25.12	7.85	-	32.97
Exchange-Complex Digital-Change Port Feature	17.31	14.13					5.45	-	-	5.45	5.45	-	-	5.45
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent (Port Feature)	25.90	21.01					5.45	-	-	5.45	5.45	-	-	5.45
Exchange-Complex Digital-Change Switch Feature Group	21.69	14.13					23.06	-	-	23.06	-	-	-	-
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent (Switch Feature Group)	30.28	21.01					23.06	-	-	23.06	-	-	-	-
Exchange-Complex Digital-Change CO Interconnection	17.31	14.13					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent (CO Interconnection)	25.90	21.01					5.69	8.80	-	14.49	5.69	7.85	-	13.53

GTE FLORIDA
 WHOLESALE NRC RATE ELEMENT DETAIL
 Revised

Docket No. 990649-TP
 Direct Testimony of Dennis B. Trimble
 Exhibit DBT-2
 FPSC Exhibit
 May 1, 2000
 Page 8 of 15

UNBUNDLED NID	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Addtl Unit			
	100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange - Basic	18.47	11.95	-	-	3.57	33.99								
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic	27.06	18.83	-	-	3.57	33.99								

INTERIM NUMBER PORTABILITY (INP)	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Addtl Unit			
	100% Manual	Semi-Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange-New	21.09	14.57					5.33	-	-	5.33	5.33	-	-	5.33
Exchange-Disconnect	9.12	6.20					5.37	-	-	5.37	5.37	-	-	5.37
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Initial	37.31	27.65					10.70	-	-	10.70	10.70	-	-	10.70
Exchange-Change	15.95	12.77					4.91	-	-	4.91	4.91	-	-	4.91
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	6.16	6.16												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Subsequent	23.05	19.65					4.91	-	-	4.91	4.91	-	-	4.91

GTE FLORIDA
WHOLESALE NRC RATE ELEMENT DETAIL
Revised

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-2

FPSC Exhibit _____
May 1, 2000
Page 15 of 15

Description	National Annual Cost
Ordering NOMC Shared/Fixed Costs	18,800,611

National Wholesale Order Volume	3,053,959
NOMC Shared/Fixed Costs	6.16

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Revised

Docket 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-3
FPSC Exhibit _____

May 1, 2000
Page 2 of 2

GTE FLORIDA, INC.
Docket No. 990649-TP
Unbundled Network Elements--Calculation of Collocation Costs

<u>Elements</u>	<u>TELRIC</u> <u>COST</u>
1 Building Modification	\$155.17
2 Environmental Conditioning	\$150.00
3 Caged Floor Space	\$258.62
4 Cable Subduct Space - Manhole	\$5.17
5 Cable Subduct Space	\$5.94
6 Cable Rack Space - Fiber	\$1.66
7 DC Power	\$967.24
8 Facility Termination - DS3	\$18.97
9 BITS Timing	\$9.48
10 Total Collocation MRCs	<u>\$1,572.25</u>
11	
12 Collocation MRC Annual Total (line 10 * 12)	\$18,867
13	
14 Total Florida Central Offices/Wire Centers	90
15 Collocators per Office	6
16 Total Collocators (line 14 * line 15)	540
17	
18 TOTAL COLLOCATION COST (line 12 * line 16)	\$10,188,207