

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Investigation into pricing )  
of unbundled network elements )  
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Docket No. 990649-TP  
Filed: May 25, 2000

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MOTION FOR CONTINUANCE OF HEARING

AT&T Communications of the Southern States, Inc. ("AT&T"), by and through its undersigned attorneys, hereby states as follows:

1. The procedural schedule in this docket requires ALECs to file testimony on June 1, 2000, and requires the ILECs to file rebuttal testimony on June 22, 2000. (Order No. PSC-00-0540-PCO-TP, issued March 16, 2000). In a Motion for Extension of Time for Filing Testimony, filed on May 15, 2000, AT&T and other Movants requested that these dates be moved to June 15 and June 29, respectively, with the hearing to begin on July 17, 2000, as originally scheduled.

2. A full understanding of BellSouth's new cost model, and the ability to run the model, revise its algorithms and inputs, and compare results with the outputs submitted by BellSouth, is essential to AT&T's ability to participate meaningfully in this significant docket. The Motion for Extension of Time was based on BellSouth's assertion that AT&T and other Movants had been provided with a working cost model; AT&T thus anticipated that it would be able to run and manipulate the model, which would enable its witnesses to prepare and file testimony. Such has not been the case.

BellSouth's cost model continues to crash repeatedly. Moreover, even as of today, there are errors in the model, parts of the model appear closed and unreviewable, and in

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working with Movants to solve these errors, even BellSouth has been unable to replicate the results included in its testimony.

3. In a Stipulation entered into by the parties to this docket on December 6, 1999, BellSouth agreed to provide information to enable the parties to “trace the sequence of calculations that culminates in the cost results . . . .” and “identify the key assumptions underlying the cost analysis.” This information was to be provided when cost studies were filed:

At the time that cost studies are filed, LECs shall submit all work papers, cost models, and supporting documentation (including manuals and instructions) in both hard copy and electronic form (where available), sufficient to enable a reviewer to trace the sequence of calculations that culminates in the cost results. Such documentation should also enable a reviewer to identify the key assumptions underlying the cost analysis.

Stipulation dated December 6, 1999, paragraph (3)(c), page 6.

Cost studies were filed on May 1, 2000, but AT&T has yet to receive a cost model that complies with the Stipulation. A working, reviewable cost model, which allows revisions to its basic assumptions and produces results which can be compared to previous runs of the model, is a fundamental prerequisite to the information set forth in the Stipulation. Had the information been provided as stipulated, AT&T would have had one month to prepare testimony. To date, however, AT&T has not been provided with work papers, models and documentation that meet the requirements of the Stipulation, rendering it impossible to prepare testimony.<sup>1</sup> This problem is not unique to AT&T; on information and belief, AT&T understands that other parties are experiencing similar difficulties with BellSouth’s cost model. Unless the hearing is rescheduled, AT&T will

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<sup>1</sup> AT&T believes, however, that BellSouth has attempted to cooperate in order to resolve problems with the cost model, and hopes to continue to work with BellSouth in this regard.

be severely prejudiced in its ability to present any substantive testimony concerning the working of the BellSouth model or its results.

WHEREFORE, for the above-stated reasons, AT&T respectfully requests that the Commission grant this Motion for Continuance, and hold a status conference to discuss a new testimony schedule.

DATED this 25<sup>th</sup> day of May, 2000.

Respectfully submitted,



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CERTIFICATE OF SERVICE  
DOCKET 990649-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via hand delivery, facsimile and/or e-mail and U.S. Mail to the following parties of record on this 25th day of May, 2000:

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*W. R. Rule*

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