

BENNETT L. ROSS
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0793

ORIGINAL

June 1, 2000

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

Re: Docket No. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to AT&T's Motion for Continuance of Hearing and the Affidavit of Robert McKnight, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Bennett L. Ross

Bennett L. Ross *(BWR)*

APP _____
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cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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**CERTIFICATE OF SERVICE
Docket No. 990649-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(#) Facsimile and Federal Express this 1st day of June, 2000 to the following:

Donna Clemons #
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman * (+) #
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. For FCCA
*Atty. for BlueStar

Andrew O. Isar
Telecommunications Resellers Assoc.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335
Tel. No. (253) 265-3910
Fax. No. (253) 265-3912

Tracy Hatch (+)
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6343

Jim Lamoureux (+)
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax. No. (404) 877-7648

Richard D. Melson (+)
Gabriel E. Nieto *
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
Atty. for Rhythms Link
Atty. for ACI *

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488

Floyd Self
Norman H. Horton, Jr. *
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Attys. for WorldCom
Atty. for NorthPoint *

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585

Susan Huther
Rick Heapter
MGC Communications, Inc.
3301 Worth Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-4272
Fax. No. (702) 310-5689

John Kerkorian (+)
MGC Communications
d/b/a Mpower Communications Corp.
Regional Vice President
Legal & Regulatory Affairs
Southeast Region
5607 Glenridge Drive, Suite 310
Atlanta, GA 30342
Tel. No. (404) 554-1000
Fax. No. (404) 554-0010

Jeremy Marcus
Kristin Smith
Blumenfeld & Cohen
1625 Massachusetts Ave., Ste. 300
Washington, D.C. 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870

Peter M. Dunbar, Esq.
Marc W. Dunbar, Esq.
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405

Mark E. Buechele, Esquire
General Counsel for Supra
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 531-5286
Fax. No. (305) 531-5287

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586

Michael A. Gross (+)
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
Tel. No. (303) 476-4200
Fax. No. (303) 476-4201

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
125 South Gadsden Street
#200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax. No. (850) 222-1355

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
215 South Monroe Street, Ste. 420
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Time Warner AxS of FL, L.P.
2301 Lucien Way
Suite 300
Maitland, FL 32751
Represented by Pennington Law Firm

Glenn Harris, Esq.
NorthPoint Communications, Inc.
222 Sutter Street
7th Floor
San Francisco, CA 94108
Tel. No. (415) 365-6095
Fax. No. (415) 403-4004
Email Fax. (503) 961-1314

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint

John P. Fons (+)
Ausley & McMullen
Washington Square Building
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500

Catherine F. Boone, Esq. (+)
Regional Counsel
Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Eric J. Branfman (+)
Morton J. Posner (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
Represents KMC, KMC II & KMC III

John McLaughlin
KMC Telecom. Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096
Tel. No. (770) 931-5260
Fax. No. (770) 638-6796

Bettye Willis (+)
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffry Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505

Norton Cutler (+) #
General Counsel
BlueStar Networks, Inc.
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-3848

Michael Bressman (+) #
Associate General Counsel
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-6660

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard, Suite 200
Tallahassee, FL 32303

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jacanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Jon C. Moyle, Jr., Esq.
Cathy M. Sellers, Esq.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
Attys. for Global NAPs
jmoylejr@moylelaw.com
csellers@moylelaw.com

Russell M. Blau
Marc B. Rothschild
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for @link Network, Inc.

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701

Constance L. Kirkendall
Regulatory Manager
@link Network, Inc.
2220 Campbell Creek Blvd.
Suite 110
Richardson, TX 75082-4420
Tel. No. (972) 367-1700
Fax. No. (972) 367-1775


Bennett L. Ross

(+) Signed Protective Agreement

ORIGINAL

In re: Investigation Into)
Pricing Of Unbundled Network)
Elements)
_____)

Docket No. 990649-TP

Filed: June 1, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO AT&T'S MOTION
FOR CONTINUANCE OF HEARING

I. INTRODUCTION

BellSouth Telecommunications, Inc., ("BellSouth") respectfully responds to the motion filed by AT&T Communications of the Southern States ("AT&T") seeking a continuance of the hearings scheduled to begin in this case on July 17, 2000. While BellSouth does not necessarily oppose AT&T's request, AT&T's claim that it has not been provided with a "working cost model" from BellSouth is untrue. While BellSouth acknowledges that AT&T's outside consultant has experienced some difficulties in operating BellSouth's model on his personal computer, most of these difficulties are the result of the consultant's own doing.

Nevertheless, BellSouth recognizes the complexity of the issues in this case and is willing to agree to a continuance, provided that this proceeding is completed before the end of this year. Thus, BellSouth agrees with the position of the Florida Competitive Carriers' Association, MCI WorldCom, Inc., and Rhythms Links, Inc. that a continuance should be granted as long as the Commission is in a position to take final action in this docket before year end. In the meantime, BellSouth will continue to assist the parties in better understanding how to operate BellSouth's cost models.

II. DISCUSSION

Although BellSouth does not object to a reasonable continuance, BellSouth cannot let go unanswerd AT&T's claim that it has not been provided with a "working cost model"

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model” because, according to AT&T, the BellSouth Telecommunications Loop Model (“BSTLM”) “continues to crash repeatedly,” contains unspecified “errors,” and includes parts that “appear closed and unreviewable.” AT&T Motion at 1-2. Not surprisingly, AT&T’s motion includes no details to substantiate its allegations, and AT&T has not even bothered to put its allegations in the form of a verified pleading or an affidavit.

In recognition of the fact that the BSTLM is a new cost model, BellSouth has made every effort to assist the parties in this proceeding, and in particular AT&T, in understanding how the BSTLM operates. For example, BellSouth has offered to make available its subject matter experts to answer questions directly from subject matter experts for the parties in this proceeding, and several parties, including AT&T, have availed themselves of this opportunity. McKnight Affidavit ¶ 2.

Although AT&T’s motion offers a litany of problems AT&T has allegedly experienced, AT&T exaggerates these problems and omits critical facts which make clear that BellSouth has provided AT&T with a “working” and “reviewable” cost model. For example, without providing any specific details, AT&T’s motion alleges that the BSTLM “continues to crash repeatedly.” While AT&T’s consultant has reported problems getting the BSTLM to run on his personal computer, the consultant’s difficulties apparently have not been encountered by others. Certainly, BellSouth has not experienced these problems, even though BellSouth and CostQuest Associates, Inc., have installed the BSTLM on nearly a dozen computers without experiencing any “crashes” of the type claimed by AT&T. Furthermore, the other carriers that have contacted BellSouth for assistance – Sprint, MCI, and Rhythms Link – have had questions about the workings of BellSouth’s cost models, but none has complained about any problems in running the BSTLM or with the model “crashing.” McKnight Affidavit ¶¶ 3-4.

BellSouth has provided AT&T's consultant with some suggestions for improving the performance of BSTLM and has observed the use of certain applications that may be affecting his ability to operate the BSTLM on his computer. Furthermore, AT&T's consultant has attempted to run the model for the entire state of Florida at the same time, even though he has been advised that doing so will cause the system to exceed Microsoft Access size limit and even though BellSouth submitted the model so that data for the state of Florida is separated into two halves because of the volume of data involved. BellSouth believes that some of the difficulties experienced by AT&T's consultant would be lessened if not eliminated if the consultant were to run the model in the manner in which it was submitted by BellSouth. Furthermore, notwithstanding the problems experienced by AT&T's consultant, he has obviously been able to run the BSTLM since he has generated results from the model. McKnight Affidavit ¶ 4.

AT&T's motion also alleges that there are "errors in the model," although AT&T does not specify what alleged errors it has in mind. Without any details, it is difficult for BellSouth to respond. However, in BellSouth's numerous contacts with AT&T's consultant, he has not brought to BellSouth's attention any alleged "errors" in the BSTLM. BellSouth has discovered that a \$96.00 cost input was omitted from one of the numerous input files in the BSTLM, but this omission was not brought to BellSouth's attention by AT&T's consultant or anyone else at AT&T. McKnight Affidavit ¶ 5. This single omission hardly constitutes an "error" in the model.

AT&T also alleges that "parts of the model appear closed and unreviewable," although again AT&T provides no specific details to support this allegation. Some files in the BSTLM are zipped, binary data files, which cannot be "read." However, BellSouth has provided AT&T with a means by which it can create viewable records of these files which it can open and review. At AT&T's request, BellSouth also has provided AT&T with the password necessary to open

various Microsoft Access and Excel files. In BellSouth's numerous contacts with AT&T's consultant, he has not brought to BellSouth's attention any aspects of the BSTLM which he claims are "closed and unreviewable." McKnight Affidavit ¶ 6.

There is no merit to AT&T's allegation that "BellSouth has been unable to replicate the results included in its testimony." In trying to assist AT&T's consultant in getting the BSTLM to operate on his computer, BellSouth installed on one of its computers a CD containing the BSTLM as filed with the Florida Commission. BellSouth installed the CD without incident and without the model "crashing." However, in running the model and in trying to understand the results reached by AT&T's consultant, BellSouth discovered that the filed version of the model did not have a box checked indicating that all local channels should be placed on fiber facilities. This box should have been checked, and, once it is checked, the BSTLM generates the identical results that BellSouth has included in its testimony. This was explained to AT&T's consultant in a telephone call on May 24, 2000, which was followed up with an e-mail the following day. McKnight Affidavit ¶ 7. It is not clear why AT&T would base its motion for a continuance on a claim which it knows not to be true.

Equally untrue is AT&T's insistence that BellSouth has not provided 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" The BSTLM contains numerous inputs and assumptions that can readily be adjusted by the user; if these inputs and assumptions are changed, the user can readily compare results between different runs of the model. BellSouth has provided all the parties, including AT&T, with all the information necessary to make adjustments to the BSTLM, including: (i) scenarios used to produce costs of all loop UNEs and loop combinations in BellSouth's filing; (ii) BSTLM input values proposed by BellSouth; (iii) BSTLM output in two formats -- a report from the BSTLM for each UNE loop showing loop

lengths and material requirements by field reporting code and an Excel file created by BSTLM to feed material costs into the Cost Calculator; (iv) BSTLM methodology document describing the GIS Pre-processing, the GIS Module, the Network Module (Configuration Process, Investment Process and Summary process), and the Reporting Engine, which provides the reader with a detailed description of how the BSTLM determines customer locations, determines cable routes, sizes the network, builds the network, and costs the network; and (v) the BSTLM User Guide which provides instructions on how to actually run the model McKnight Affidavit ¶ 8.

It appears that AT&T's real complaint is its inability to "revise" the algorithms upon which the BSTLM is based. However, revising the BSTLM's algorithms is much different than changing a user-adjustable input or assumption and would result in an entirely different cost model. Nothing in the stipulation required BellSouth to file a cost model that allows AT&T to change the fundamental nature of the model at its whim. McKnight Affidavit ¶ 9.

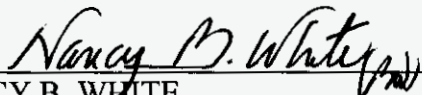
BellSouth has gone well beyond the requirements of the stipulation in providing necessary assistance to AT&T and the other parties in this docket in understanding BellSouth's cost models. It has provided information without the need for formal discovery requests, and made available its subject matter experts to answer questions. Under these circumstances and whether or not the Commission decides to grant a continuance, AT&T's claims of "prejudice" ring hollow.

III. CONCLUSION


For the foregoing reasons, BellSouth has no objection to a continuance, provided that this proceeding is completed before the end of this year.

Respectfully submitted this 15th day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
MICHAEL P. GOGGIN
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5555



BENNETT L. ROSS
E. EARL EDENFIELD, JR.
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0793

214549

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation Into)
Pricing Of Unbundled Network) Docket No. 990649-TP
Elements)
_____) Filed: June 1, 2000

AFFIDAVIT OF ROBERT MCKNIGHT

Comes the affiant, Robert McKnight, and being duly sworn, deposes and says:

1. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as Director – Cost Matters for the nine-state BellSouth region. My career at BellSouth spans nearly twenty-five years and includes positions in Cost, Capital Recovery, and Strategic Planning. In my current position, I direct the groups responsible for developing many of the unbundled network element cost studies at issue in this proceeding, including the loop and switching cost models. I submit this Affidavit in support of BellSouth's opposition to AT&T's Motion for a Continuance.

2. On May 15, 2000, I attended the technical workshop conducted by the Florida Public Service Commission staff concerning BellSouth's cost models. At this workshop, BellSouth offered to make available its subject matter experts, including myself, to answer questions directly from subject matter experts for the various parties in this proceeding. I was subsequently designated as the contact person for such questions. In that capacity, I and Jim Stegeman with CostQuest Associates, Inc. have had several phone calls and exchanged e-mails with Brian Pitkin, AT&T's consultant in this case. I also have provided assistance to other parties in this proceeding, including MCI, Rhythms Link, and Sprint, in gaining a better understanding of BellSouth's cost models.

3. I have reviewed AT&T's Motion for a Continuance filed on May 25, 2000, in which AT&T alleges that it has experienced certain problems in operating BellSouth's "cost model," which I assume is the BellSouth Telecommunications Loop Model ("BSTLM") filed with the Florida Commission on April 17, 2000. Based on my involvement with AT&T's consultant Mr. Pitkin, AT&T's motion exaggerates the problems AT&T has experienced and omits critical facts which make clear that BellSouth has provided AT&T with a "working" and "reviewable" cost model. Furthermore, AT&T's motion overlooks that many of the problems experienced by AT&T in running the BSTLM are AT&T's own doing.

4. Without providing any specific details, AT&T's motion alleges that the BSTLM "continues to crash repeatedly." While I am aware that Mr. Pitkin has reported problems getting the BSTLM to run on his personal computer, Mr. Pitkin's difficulties may be due to a software conflict and apparently have not been encountered by others. Certainly, BellSouth has not experienced these problems, even though BellSouth and CostQuest Associates, Inc., have installed the BSTLM on nearly a dozen computers without experiencing any "crashes" of the type noted by Mr. Pitkin and AT&T. Furthermore, the other carriers with whom I have had contact – Sprint, MCI, and Rhythms Link – have had questions about the workings of BellSouth's cost models, but none has complained to me about any problems in running the BSTLM or with the model "crashing." BellSouth has provided Mr. Pitkin with some suggestions for improving the performance of the BSTLM and has observed the use of certain applications that may be affecting Mr. Pitkin's ability to operate the BSTLM on his computer. Furthermore, Mr. Pitkin has attempted to run the model for the entire state of Florida at the same time, even though he has been advised that doing so will cause the system to exceed Microsoft's Access size limit and even though BellSouth submitted the model so that data for the state of Florida is

separated into two halves because of the volume of data involved. BellSouth believes that some of the difficulties experienced by Mr. Pitkin would be lessened if not eliminated if Mr. Pitkin were to run the model in the manner in which it was submitted by BellSouth. Nevertheless, notwithstanding the problems Mr. Pitkin has encountered, he has obviously been able to run the model since he has generated results from the BSTLM

5. AT&T's motion also alleges that there are "errors in model," although AT&T does not specify what alleged errors it has in mind. Without any details it is difficult to respond. However, I can state that in BellSouth's numerous contacts with Mr. Pitkin, he has not brought to our attention any alleged "errors" in the BSTLM. BellSouth has discovered that a \$96.00 cost input was omitted from one of the numerous input files in the BSTLM, but this omission was not brought to BellSouth's attention by Mr. Pitkin or anyone else at AT&T.

6. AT&T's motion also alleges that "parts of the model appear closed and unreviewable," although again AT&T provides no specific details to support this allegation. Some files in the BSTLM are zipped, binary data files, which cannot be "read." However, BellSouth has provided AT&T with a means by which it can create viewable records of these files which it can open and review. At AT&T's request, BellSouth also has provided AT&T with the password necessary to open various Microsoft Access and Excel files. In BellSouth's numerous contacts with Mr. Pitkin, he has not brought to our attention any aspects of the BSTLM which he claims are "closed and unreviewable."

7. AT&T's allegation that "BellSouth has been unable to replicate the results included in its testimony" is misleading at best. In trying to assist Mr. Pitkin in getting the BSTLM to operate on his computer, BellSouth installed on one of its computers a CD containing the BSTLM as filed with the Florida Commission. BellSouth installed the CD without incident

and without the model “crashing.” However, in running the model and in trying to understand the results reached by Mr. Pitkin, BellSouth discovered that the filed version of the model did not have a box checked indicating that all local channels should be placed on fiber facilities. This box should have been checked, and, once it is checked, the BSTLM generates the identical results that BellSouth has included in its testimony. I explained this to Mr. Pitkin in a telephone call on May 24, 2000, which I followed up with an e-mail the following day. Thus, AT&T’s claim that BellSouth has not been able to replicate the results included in its testimony is not true.

8. Equally untrue is AT&T’s insistence that BellSouth has not provided 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” The BSTLM contains numerous inputs and assumptions that can readily be adjusted by the user; if these inputs and assumptions are changed, the user can readily compare results between different runs of the model. BellSouth has provided all the parties, including AT&T, with all the information necessary to make adjustments to the BSTLM, including: (i) scenarios used to produce costs of all loop UNEs and loop combinations in BellSouth’s filing; (ii) BSTLM input values proposed by BellSouth; (iii) BSTLM output in two formats -- a report from the BSTLM for each UNE loop showing loop lengths and material requirements by field reporting code and an Excel file created by BSTLM to feed material costs into the Cost Calculator; (iv) BSTLM methodology document describing the GIS Pre-processing, the GIS Module, the Network Module (Configuration Process, Investment Process and Summary process), and the Reporting Engine, which provides the reader with a detailed description of how the BSTLM determines customer locations, determines cable routes,

sizes the network, builds the network, and costs the network; and (v) the BSTLM User Guide which provides instructions on how to actually run the model

9. It appears that AT&T's real complaint is its inability to "revise" the algorithms upon which the BSTLM is based. However, revising the BSTLM's algorithms is much different than changing a user-adjustable input or assumption and would result in an entirely different cost model. Nothing in the stipulation required BellSouth to file a cost model that allows AT&T to change the fundamental nature of the model at its whim.

Further, affiant sayeth naught.


Robert McKnight

Subscribed and sworn to before me this 1st
day of ~~May~~ ^{June} 2000


Notary Public 3/16/2002

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