



1       **Q.   BellSouth proposes deaveraged loops into three zones,**  
2       **based on tariffed rate groups. Do you agree?**

3

4       A.   No. In the first instance, BellSouth's tariffed rate  
5       groups are not an appropriate basis for deaveraging  
6       rates. As shown in Sprint's Exhibit JWS 1, BellSouth's  
7       rate groups are not based on the underlying costs of  
8       the wire centers within each of those rate groups.  
9       Consequently, BellSouth's proposed banding includes  
10      high-cost wire centers in the lowest cost band, and  
11      low-cost wire centers in the higher cost bands. For  
12      example, the actual wire center costs within their  
13      proposed rate band 1 range from \$7.50 to \$33.27. The  
14      actual wire center costs within band 2 range from  
15      \$11.57 to \$115.81. And the actual wire center costs in  
16      band 3 range from \$13.73 to \$75.95.

17

18      BellSouth, then, would propose to charge \$15.91 for  
19      the \$33.27 loop in the wire center in band 1, but  
20      would charge \$25.54 for the \$13.73 loop in the wire  
21      center in rate band 3. In addition, BellSouth has two  
22      wire centers whose costs are the same, \$15.59, but  
23      fall into different rate bands. BellSouth proposes to  
24      charge \$15.91 for loops in the wire center that falls  
25      into rate band 1, and \$19.98 for loops in the wire

1 center that falls into rate band 2. Charging different  
2 rates for loops that have the exact same costs, or  
3 charging a rate for one loop that is higher than the  
4 rate charged for a higher cost loop is both  
5 discriminatory and inconsistent with the requirement  
6 for cost-based unbundled network elements.

7  
8 Secondly, 3 rate bands are insufficient to reflect the  
9 cost variations among BellSouth wire centers. While  
10 the FCC has concluded that three zones may be  
11 sufficient to reflect geographic cost differences, it  
12 also states that "a state may establish more than  
13 three zones where cost differences in geographic  
14 regions are such that it finds that additional zones  
15 are needed to adequately reflect the costs of  
16 interconnection and access to unbundled elements"  
17 (First Report and Order, FCC Docket 96-98, released  
18 August 8, 1996, Paragraph 765).

19  
20 Sprint's proposed banding criteria is that the average  
21 rate for a rate zone should not deviate by more than  
22 20% from the wire center forward-looking cost of that  
23 element for any wire center included in that zone. By  
24 following Sprint's criteria, 8 zones would be required  
25 to map BellSouth's proposed wire center loop costs

1 into rate zones, as set forth in Sprint's Exhibit JWS  
2 2. However, Sprint would not be opposed to permitting  
3 a wider range of deviation in the highest cost zone,  
4 recognizing the larger cost variances in the highest  
5 cost areas and the undesirability of creating an  
6 excessive number of zones. (The exhibit is  
7 illustrative only, and should not be construed as an  
8 endorsement of BellSouth's proposed costs. Indeed, as  
9 discussed in the Rebuttal Testimony of Sprint witness  
10 Dickerson, there are significant flaws in BellSouth's  
11 loop cost studies. The deaveraging of loop and other  
12 UNE rates pursuant to Sprint's deaveraging proposal  
13 should, of course, be based on the actual cost results  
14 approved by this Commission).

15

16 **Q. BellSouth's witness Varner asserts that only loops**  
17 **should be deaveraged. Do you agree?**

18

19 A. No. Sprint believes substantial geographic cost  
20 variances exist for the following elements:

- 21 • Unbundled Loops
- 22 • Subloops
- 23 • Local Switch Ports/Local Switching Usage
- 24 • Dedicated and Common Transport

- 1                   • Dark Fiber
- 2                   • UNE Platform
- 3                   • Enhanced Extended Link (EEL)
- 4

5           **Q. Do the BellSouth local switching costs support their**  
6           **contention that the element should not be deaveraged?**

7

8           A. No. BellSouth's own data shows significant geographic  
9           cost variances. For example, BellSouth's proposed wire  
10          center costs per minute of use for local switching  
11          range from \$.0005184 to \$.0066327, a variance of  
12          almost 1200%. A variance in costs of this magnitude  
13          portrays a definite need for geographic deaveraging.

14

15          **Q. Do the BellSouth cost studies support their conclusion**  
16          **that transport should not be deaveraged?**

17

18          A. No. With respect to BellSouth's argument that mileage  
19          captures adequate geographic variation, Sprint witness  
20          Cox (pg. 3) explains that while distance is a cost  
21          driver, terminal bandwidth and utilization/demand on  
22          the SONET ring are the primary cost drivers, both of  
23          which may vary considerably by geographic area.  
24          Therefore, it is imperative to consider these

1 geographic-specific factors in order to accurately  
2 depict the forward-looking cost of transport.

3

4 **Q. Does that conclude your testimony?**

5

6 **A. Yes.**

7

8

9

10

11

**Sprint-Florida**  
**Bell South Proposed Banding**  
**Proposed Deaveraged 2-wire Loop SL1 Rates - Bell South**  
**(A.1.1)**

A	B	C	D	E	F	H	I
Rate Banding Summary							
Row	Rate ID	Rate Band	Number of Wire Centers	Total Lines Served	Monthly Cost	Percent of Total Lines	
8							
9	1	Rate Band 1	80	4,165,659	\$15.91	60.56%	
10	2	Rate Band 2	80	2,341,036	\$19.98	34.03%	
11	3	Rate Band 3	36	372,370	\$25.54	5.41%	
21							
22		Total	196	6,879,065	\$ 17.82	100.00%	
23							
24							
25 to Band Detail (Sorted by Monthly Cost)				Common Cost	6.24%	(Already included in Monthly Cost)	

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
32							
33	1		MIAMFLDB	7,659	\$ 7.50	0.18%	-52.87%
34	1		JCVLFLJT	9,599	\$ 7.52	0.23%	-52.75%
35	1		MIAMFLKE	11,788	\$ 9.09	0.28%	-42.88%
36	1		MIAMFLAP	20,231	\$ 10.65	0.49%	-33.08%
37	1		MIAMFLGR	63,357	\$ 10.66	1.52%	-33.02%
38	1		MIAMFLBC	17,573	\$ 11.08	0.42%	-30.38%
39	1		MIAMFLBR	60,632	\$ 11.18	1.46%	-29.75%
40	2		DYBHFLFN	2,879	\$ 11.57	0.12%	-42.10%
41	1		HLWDFLHA	36,199	\$ 11.85	0.87%	-25.54%
42	2		WPBHFLAN	57,398	\$ 12.11	2.45%	-39.40%
43	1		MIAMFLME	24,392	\$ 12.21	0.59%	-23.28%
44	1		NDADFLOL	58,291	\$ 12.48	1.40%	-21.58%
45	1		MIAMFLIC	46,741	\$ 12.57	1.12%	-21.02%
46	1		MIAMFLFL	34,705	\$ 12.65	0.83%	-20.51%
47	1		ORLDFLMA	86,927	\$ 12.70	2.09%	-20.20%
48	1		MIAMFLAE	79,429	\$ 12.80	1.91%	-19.57%
49	1		JCVLFLSM	28,514	\$ 12.99	0.68%	-18.38%
50	1		JCVLFLCL	65,905	\$ 13.00	1.58%	-18.32%
51	1		MIAMFLBA	40,072	\$ 13.27	0.96%	-16.62%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
52	1		MIAMFLNM	31,550	\$ 13.41	0.76%	-15.74%
53	1		MIAMFLPL	80,350	\$ 13.48	1.93%	-15.30%
54	1		FTLDFLMR	95,006	\$ 13.57	2.28%	-14.73%
55	1		FTLDFLCR	55,494	\$ 13.66	1.33%	-14.17%
56	1		FTLDFLCY	74,108	\$ 13.67	1.78%	-14.11%
57	3		KYWSFLMA	36,958	\$ 13.73	9.93%	-46.24%
58	1		MIAMFLWM	56,238	\$ 13.77	1.35%	-13.48%
59	1		BCRTFLMA	92,002	\$ 14.24	2.21%	-10.52%
60	1		FTLDFLSU	56,306	\$ 14.28	1.35%	-10.27%
61	1		NDADFLAC	49,809	\$ 14.40	1.20%	-9.52%
62	1		HLWDFLMA	58,648	\$ 14.65	1.41%	-7.95%
63	1		FTLDFLSG	7,202	\$ 14.66	0.17%	-7.88%
64	1		JCVLFLIA	2,429	\$ 14.67	0.06%	-7.82%
65	1		FTLDFLAO	74,347	\$ 14.70	1.78%	-7.63%
66	1		FTLDFLAP	3,146	\$ 14.79	0.08%	-7.07%
67	2		CCBHFLMA	27,668	\$ 14.85	1.18%	-25.69%
68	1		BCRTFLBT	44,746	\$ 14.92	1.07%	-6.25%
69	3		NKLRFLMA	3,293	\$ 15.05	0.88%	-41.07%
70	1		MNDRFLAV	9,752	\$ 15.15	0.23%	-4.81%
71	1		MIAMFLWD	64,053	\$ 15.17	1.54%	-4.68%
72	1		MIAMFLPB	51,410	\$ 15.19	1.23%	-4.55%
73	1		PMBHFLTA	45,170	\$ 15.23	1.08%	-4.30%
74	2		DYBHFLMA	62,008	\$ 15.35	2.65%	-23.18%
75	1		JCVLFLSJ	50,208	\$ 15.56	1.21%	-2.23%
76	2		DLBHFLMA	48,601	\$ 15.59	2.08%	-21.98%
77	1		PMBHFLMA	91,941	\$ 15.59	2.21%	-2.04%
78	1		MIAMFLSO	71,368	\$ 15.64	1.71%	-1.73%
79	1		DRBHFLMA	72,583	\$ 15.66	1.74%	-1.60%
80	1		JCBHFLSP	14,428	\$ 15.74	0.35%	-1.10%
81	1		PMBHFLFE	84,965	\$ 15.75	2.04%	-1.04%
82	1		MIAMFLAL	37,334	\$ 15.82	0.90%	-0.60%
83	1		MIAMFLHL	132,181	\$ 15.86	3.17%	-0.34%
84	1		JCVLFLFC	20,197	\$ 15.89	0.48%	-0.16%
85	1		MIAMFLCA	106,289	\$ 15.92	2.55%	0.03%
86	1		NDADFLGG	39,819	\$ 15.95	0.96%	0.22%
87	1		ORLDFLCL	53,496	\$ 16.10	1.28%	1.16%
88	1		MIAMFLRR	63,795	\$ 16.13	1.53%	1.35%
89	1		PMBHFLCS	93,150	\$ 16.16	2.24%	1.54%
90	1		MIAMFLSH	43,098	\$ 16.26	1.03%	2.17%
91	2		GSVLFLMA	130,947	\$ 16.31	5.59%	-18.38%
92	1		JCVLFLAR	37,777	\$ 16.34	0.91%	2.67%
93	2		JCBHFLMA	36,614	\$ 16.49	1.56%	-17.48%



A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
94	2		WPBHFLRB	54,219	\$ 16.57	2.32%	-17.08%
95	2		VRBHFLBE	16,849	\$ 16.61	0.72%	-16.88%
96	1		HLWDFLWH	82,835	\$ 16.68	1.99%	4.81%
97	2		WPBHFLHH	86,861	\$ 16.76	3.71%	-16.13%
98	2		DYBHFLS	9,107	\$ 16.80	0.39%	-15.93%
99	2		WPBHFLLE	50,482	\$ 16.85	2.16%	-15.68%
100	2		LKMRFLMA	16,002	\$ 17.01	0.68%	-14.88%
101	2		PNSCFLBL	57,961	\$ 17.18	2.48%	-14.03%
102	2		ORPKFLRW	18,247	\$ 17.19	0.78%	-13.98%
103	1		JCVLFLBW	46,851	\$ 17.23	1.12%	8.26%
104	1		JCVLFLRV	37,729	\$ 17.25	0.91%	8.39%
105	2		DLBHFLKP	45,726	\$ 17.32	1.95%	-13.33%
106	1		BCRTFLSA	74,410	\$ 17.49	1.79%	9.90%
107	1		MIAMFLNS	36,258	\$ 17.60	0.87%	10.59%
108	1		FTLDFLJA	74,436	\$ 17.61	1.79%	10.65%
109	2		WPBHFLGR	60,813	\$ 17.72	2.60%	-11.32%
110	2		GSVLFLNW	15,578	\$ 17.75	0.67%	-11.17%
111	2		EGLFLIH	22,251	\$ 17.78	0.95%	-11.02%
112	1		ORLDFLPC	87,212	\$ 17.80	2.09%	11.85%
113	2		MICCFLLB	7,596	\$ 17.85	0.32%	-10.67%
114	2		WPBHFLGA	104,805	\$ 17.86	4.48%	-10.62%
115	1		FTLDFLPL	72,139	\$ 17.87	1.73%	12.29%
116	2		PNVDFLMA	24,100	\$ 17.97	1.03%	-10.07%
117	1		ORLDFLSA	42,998	\$ 18.01	1.03%	13.16%
118	1		BYBHFLMA	77,402	\$ 18.04	1.86%	13.35%
119	1		MIAMFLOL	32,295	\$ 18.07	0.78%	13.54%
120	1		ORLDFLPH	117,491	\$ 18.26	2.82%	14.74%
121	1		NDADFLBR	59,976	\$ 18.29	1.44%	14.92%
122	1		FTLDFLWN	29,518	\$ 18.35	0.71%	15.30%
123	1		HLWDFLPE	113,722	\$ 18.37	2.73%	15.43%
124	2		HTISFLMA	23,535	\$ 18.47	1.01%	-7.57%
125	2		COCOFLME	29,133	\$ 18.54	1.24%	-7.22%
126	3		BLGLFLMA	11,143	\$ 18.69	2.99%	-26.81%
127	2		ORPKFLMA	30,289	\$ 18.75	1.29%	-6.17%
128	1		ORLDFLAP	107,731	\$ 18.87	2.59%	18.57%
129	1		JCBHFLAB	15,439	\$ 18.88	0.37%	18.63%
130	1		MNDRFLLO	46,577	\$ 18.89	1.12%	18.69%
131	2		PNCYFLMA	50,401	\$ 18.95	2.15%	-5.17%
132	3		KYLRFLLS	10,075	\$ 19.15	2.71%	-25.01%
133	2		STRTFLMA	67,365	\$ 19.27	2.88%	-3.57%
134	2		DYBHFLPO	52,960	\$ 19.33	2.26%	-3.27%
135	2		DYBHFLPB	32,859	\$ 19.38	1.40%	-3.02%

A	B	C	D	E	F	H	I
Row	Rate Band	Change	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
136	2		PTSLFLSO	20,109	\$ 19.40	0.86%	-2.92%
137	3		STAGFLBS	13,800	\$ 19.40	3.71%	-24.03%
138	1		PRRNFLMA	116,260	\$ 19.57	2.79%	22.97%
139	2		EGLLFLBG	49,414	\$ 19.70	2.11%	-1.42%
140	2		PNSCFLFP	61,800	\$ 19.71	2.64%	-1.37%
141	1		JCVLFLWC	45,636	\$ 19.82	1.10%	24.54%
142	2		JPTRFLMA	57,476	\$ 19.98	2.46%	-0.01%
143	2		DBRYFLMA	8,181	\$ 20.00	0.35%	0.09%
144	2		DBRYFLDL	16,979	\$ 20.23	0.73%	1.24%
145	3		STAGFLMA	30,998	\$ 20.27	8.32%	-20.63%
146	2		COCOFLMA	52,359	\$ 20.29	2.24%	1.54%
147	2		DELDFLMA	28,928	\$ 20.34	1.24%	1.79%
148	2		VRBHFLMA	52,762	\$ 20.40	2.25%	2.09%
149	1		JCVLFLNO	36,867	\$ 20.51	0.89%	28.87%
150	3		PAHKFLMA	3,900	\$ 20.71	1.05%	-18.90%
151	3		NSBHFLMA	43,307	\$ 20.75	11.63%	-18.75%
152	2		MLBRFLMA	105,838	\$ 20.81	4.52%	4.14%
153	2		GLBRFLMC	19,581	\$ 20.83	0.84%	4.24%
154	2		PNSCFLWA	35,294	\$ 20.83	1.51%	4.24%
155	2		PCBHFLNT	31,399	\$ 20.88	1.34%	4.49%
156	3		MRTHFLVE	15,124	\$ 20.97	4.06%	-17.89%
157	2		SNFRFLMA	60,185	\$ 21.05	2.57%	5.34%
158	2		HBSDFLMA	12,025	\$ 21.06	0.51%	5.39%
159	3		KYLRFLMA	10,260	\$ 21.16	2.76%	-17.14%
160	1		HMSTFLHM	39,717	\$ 21.27	0.95%	33.65%
161	3		FLBHFLMA	5,756	\$ 21.33	1.55%	-16.48%
162	2		FTPRFLMA	63,485	\$ 21.69	2.71%	8.54%
163	3		STAGFLSH	11,287	\$ 21.82	3.03%	-14.56%
164	2		PNSCFLPB	7,258	\$ 21.94	0.31%	9.79%
165	1		OVIDFLCA	33,030	\$ 21.98	0.79%	38.11%
166	1		HMSTFLAF	11,615	\$ 22.07	0.28%	38.68%
167	3		FRBHFLFP	20,969	\$ 22.24	5.63%	-12.91%
168	2		MNDRFLMW	8,939	\$ 22.53	0.38%	12.75%
169	2		TTVLFLMA	37,307	\$ 22.65	1.59%	13.35%
170	1		JCVLFLLF	41,399	\$ 22.94	0.99%	44.14%
171	2		PNCYFLCA	10,157	\$ 22.97	0.43%	14.95%
172	2		VVSPFLSH	36,998	\$ 22.99	1.58%	15.05%
173	3		PLCSFLMA	14,463	\$ 23.11	3.88%	-9.51%
174	3		ISLMFLMA	5,534	\$ 23.12	1.49%	-9.47%
175	2		LYHNFLOH	13,557	\$ 23.31	0.58%	16.65%
176	2		PNSCFLHC	11,149	\$ 23.36	0.48%	16.90%
177	2		WPBHFLRP	49,527	\$ 24.13	2.12%	20.75%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
178	2		PTSLFLMA	44,164	\$ 24.18	1.89%	21.00%
179	2		SBSTFLMA	17,548	\$ 24.18	0.75%	21.00%
180	1		JCVLFLOW	20,234	\$ 24.62	0.49%	54.70%
181	2		CNTMFLLE	9,098	\$ 26.26	0.39%	31.41%
182	3		DLSPFLMA	2,629	\$ 26.30	0.71%	2.99%
183	2		HLNVFLMA	13,351	\$ 26.37	0.57%	31.96%
184	2		WWSPFLHI	16,799	\$ 26.76	0.72%	33.91%
185	2		BKVLFLJF	26,498	\$ 27.38	1.13%	37.02%
186	2		SBSTFLFE	1,795	\$ 27.42	0.08%	37.22%
187	3		OKHLFLMA	2,400	\$ 28.22	0.64%	10.50%
188	2		MLTNFLRA	23,249	\$ 28.41	0.99%	42.17%
189	2		PACEFLPV	13,498	\$ 28.46	0.58%	42.42%
190	3		CDKYFLMA	1,578	\$ 28.70	0.42%	12.38%
191	3		PLTKFLMA	21,599	\$ 29.10	5.80%	13.95%
192	2		MDBGFLPM	14,799	\$ 30.21	0.63%	51.18%
193	3		SGKYFLMA	5,064	\$ 30.36	1.36%	18.88%
194	3		BGPIFLMA	7,284	\$ 30.82	1.96%	20.68%
195	3		LKCYFLMA	28,043	\$ 30.83	7.53%	20.72%
196	3		GCSPFLCN	9,356	\$ 31.22	2.51%	22.25%
197	1		HMSTFLEA	2,406	\$ 31.78	0.06%	99.69%
198	2		HAVNFLMA	5,749	\$ 32.81	0.25%	64.19%
199	1		EORNFLMA	7,067	\$ 33.27	0.17%	109.05%
200	3		KYHGFLMA	7,390	\$ 34.23	1.98%	34.04%
201	2		DNLNFLWM	14,736	\$ 35.85	0.63%	79.40%
202	2		YULEFLMA	4,534	\$ 36.22	0.19%	81.25%
203	3		YNTWFLMA	3,109	\$ 36.52	0.83%	43.00%
204	2		ARCHFLMA	3,567	\$ 36.92	0.15%	84.76%
205	3		WELKFLMA	2,889	\$ 37.66	0.78%	47.47%
206	2		GENVFLMA	2,898	\$ 37.73	0.12%	88.81%
207	2		STAGFLWG	1,714	\$ 38.73	0.07%	93.81%
208	3		CHPLFLJA	6,948	\$ 38.79	1.87%	51.89%
209	3		PMPKFLMA	3,468	\$ 39.30	0.93%	53.89%
210	3		CFLDFLMA	6,109	\$ 39.86	1.64%	56.08%
211	2		FTGRFLMA	1,137	\$ 40.23	0.05%	101.32%
212	3		PRSNFLFD	3,009	\$ 41.20	0.81%	61.33%
213	2		HWTHFLMA	4,369	\$ 41.30	0.19%	106.68%
214	3		BNNLFLMA	7,582	\$ 42.67	2.04%	67.09%
215	2		NWBYFLMA	4,821	\$ 42.76	0.21%	113.98%
216	2		TRENFLMA	5,109	\$ 43.70	0.22%	118.69%
217	2		MXVLFLMA	2,105	\$ 44.87	0.09%	124.54%
218	3		CSCYFLBA	4,159	\$ 46.00	1.12%	80.13%
219	3		GCVLFLMA	4,279	\$ 48.02	1.15%	88.04%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
220	2		MCNPFLLMA	1,909	\$ 49.92	0.08%	149.81%
221	2		BRSNFLMA	3,788	\$ 50.41	0.16%	152.26%
222	2		BLDWFLMA	2,894	\$ 51.89	0.12%	159.67%
223	2		YNFNFLMA	3,470	\$ 53.05	0.15%	165.48%
224	3		OLTWFLLN	4,809	\$ 53.76	1.29%	110.51%
225	2		JAY-FLMA	2,847	\$ 63.20	0.12%	216.27%
226	3		VERNFLMA	2,040	\$ 67.33	0.55%	163.65%
227	3		SYHSFLCC	1,759	\$ 75.95	0.47%	197.40%
228	2		MNSNFLMA	629	\$ 115.81	0.03%	479.54%

**Sprint-Florida  
Sprint Proposed Banding  
Proposed Deaveraged 2-wire Loop SL1 Rates - Bell South  
(A.1.1)**

A	B	C	D	E	F	H	I
<b>Rate Banding Summary</b>							
Row	Rate ID	Band	Number of Wire Centers	Total Lines Served	Monthly Cost	Percent of Total Lines	
8							
9	1	Rate Band 1	4	49,277	\$9.18	0.72%	
10	2	Rate Band 2	34	1,562,066	\$13.27	22.71%	
11	3	Rate Band 3	90	4,473,007	\$17.77	65.02%	
12	4	Rate Band 4	29	573,693	\$23.80	8.34%	
13	5	Rate Band 5	19	150,730	\$32.51	2.19%	
14	6	Rate Band 6	16	63,017	\$45.28	0.92%	
15	7	Rate Band 7	3	6,646	\$67.84	0.10%	
16	8	Rate Band 8	1	629	\$115.81	0.01%	
21							
22		Total	196	6,879,065	\$ 17.82	100.00%	
23							
24							
			Common Cost				
25 Rate Band Detail (Sorted by Monthly Cost)			6.24% (Already included in Monthly Cost)				
A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
32							
33	1		MIAMFLDB	7,659	\$ 7.50	15.54%	-18.28%
34	1		JCVLFLJT	9,599	\$ 7.52	19.48%	-18.06%
35	1		MIAMFLKE	11,788	\$ 9.09	23.92%	-0.95%
36	1		MIAMFLAP	20,231	\$ 10.65	41.06%	16.04%
37		Band 1 Summary		49,277	\$ 9.18	100%	
38	2		MIAMFLGR	63,357	\$ 10.66	4.06%	-19.68%
39	2		MIAMFLBC	17,573	\$ 11.08	1.12%	-16.52%
40	2		MIAMFLBR	60,632	\$ 11.18	3.88%	-15.76%
41	2		DYBHFLFN	2,879	\$ 11.57	0.18%	-12.83%
42	2		HLWDFLHA	36,199	\$ 11.85	2.32%	-10.72%
43	2		WPBHFLAN	57,398	\$ 12.11	3.67%	-8.76%
44	2		MIAMFLME	24,392	\$ 12.21	1.56%	-8.00%
45	2		NDADFLOL	58,291	\$ 12.48	3.73%	-5.97%
46	2		MIAMFLIC	46,741	\$ 12.57	2.99%	-5.29%
47	2		MIAMFLFL	34,705	\$ 12.65	2.22%	-4.69%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
48	2		ORLDFLMA	86,927	\$ 12.70	5.56%	-4.31%
49	2		MIAMFLAE	79,429	\$ 12.80	5.08%	-3.56%
50	2		JCVLFLSM	28,514	\$ 12.99	1.83%	-2.13%
51	2		JCVLFLCL	65,905	\$ 13.00	4.22%	-2.05%
52	2		MIAMFLBA	40,072	\$ 13.27	2.57%	-0.02%
53	2		MIAMFLNM	31,550	\$ 13.41	2.02%	1.04%
54	2		MIAMFLPL	80,350	\$ 13.48	5.14%	1.57%
55	2		FTLDFLMR	95,006	\$ 13.57	6.08%	2.24%
56	2		FTLDFLCR	55,494	\$ 13.66	3.55%	2.92%
57	2		FTLDFLCY	74,108	\$ 13.67	4.74%	3.00%
58	2		KYWSFLMA	36,958	\$ 13.73	2.37%	3.45%
59	2		MIAMFLWM	56,238	\$ 13.77	3.60%	3.75%
60	2		BCRTFLMA	92,002	\$ 14.24	5.89%	7.29%
61	2		FTLDFLSU	56,306	\$ 14.28	3.60%	7.59%
62	2		NDADFLAC	49,809	\$ 14.40	3.19%	8.50%
63	2		HLWDFLMA	58,648	\$ 14.65	3.75%	10.38%
64	2		FTLDFLSG	7,202	\$ 14.66	0.46%	10.46%
65	2		JCVFLIA	2,429	\$ 14.67	0.16%	10.53%
66	2		FTLDFLOA	74,347	\$ 14.70	4.76%	10.76%
67	2		FTLDFLAP	3,146	\$ 14.79	0.20%	11.44%
68	2		CCBHFLMA	27,668	\$ 14.85	1.77%	11.89%
69	2		BCRTFLBT	44,746	\$ 14.92	2.86%	12.41%
70	2		NKLRFLMA	3,293	\$ 15.05	0.21%	13.39%
71	2		MNDRFLAV	9,752	\$ 15.15	0.62%	14.15%
72		Band 2 Summary		1,562,066	\$ 13.27	100%	
73	3		MIAMFLWD	64,053	\$ 15.17	1.43%	-14.61%
74	3		MIAMFLPB	51,410	\$ 15.19	1.15%	-14.50%
75	3		PMBHFLTA	45,170	\$ 15.23	1.01%	-14.28%
76	3		DYBHFLMA	62,008	\$ 15.35	1.39%	-13.60%
77	3		JCVLFLSJ	50,208	\$ 15.56	1.12%	-12.42%
78	3		DLBHFLMA	48,601	\$ 15.59	1.09%	-12.25%
79	3		PMBHFLMA	91,941	\$ 15.59	2.06%	-12.25%
80	3		MIAMFLSO	71,368	\$ 15.64	1.60%	-11.97%
81	3		DRBHFLMA	72,583	\$ 15.66	1.62%	-11.86%
82	3		JCBHFLSP	14,428	\$ 15.74	0.32%	-11.41%
83	3		PMBHFLFE	84,965	\$ 15.75	1.90%	-11.35%
84	3		MIAMFLAL	37,334	\$ 15.82	0.83%	-10.96%
85	3		MIAMFLHL	132,181	\$ 15.86	2.96%	-10.73%
86	3		JCVLFLFC	20,197	\$ 15.89	0.45%	-10.56%
87	3		MIAMFLCA	106,289	\$ 15.92	2.38%	-10.39%
88	3		NDADFLGG	39,819	\$ 15.95	0.89%	-10.22%
89	3		ORLDFLCL	53,496	\$ 16.10	1.20%	-9.38%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
90	3		MIAMFLRR	63,795	\$ 16.13	1.43%	-9.21%
91	3		PMBHFLCS	93,150	\$ 16.16	2.08%	-9.04%
92	3		MIAMFLSH	43,098	\$ 16.26	0.96%	-8.48%
93	3		GSVLFLMA	130,947	\$ 16.31	2.93%	-8.20%
94	3		JCVLFLAR	37,777	\$ 16.34	0.84%	-8.03%
95	3		JCBHFLMA	36,614	\$ 16.49	0.82%	-7.18%
96	3		WPBHFLRB	54,219	\$ 16.57	1.21%	-6.73%
97	3		VRBHFLBE	16,849	\$ 16.61	0.38%	-6.51%
98	3		HLWDFLWH	82,835	\$ 16.68	1.85%	-6.12%
99	3		WPBHFLHH	86,861	\$ 16.76	1.94%	-5.66%
100	3		DYBHFLS	9,107	\$ 16.80	0.20%	-5.44%
101	3		WPBHFLLE	50,482	\$ 16.85	1.13%	-5.16%
102	3		LKMRFLLA	16,002	\$ 17.01	0.36%	-4.26%
103	3		PNSCFLLB	57,961	\$ 17.18	1.30%	-3.30%
104	3		ORPKFLRW	18,247	\$ 17.19	0.41%	-3.24%
105	3		JCVLFLBW	46,851	\$ 17.23	1.05%	-3.02%
106	3		JCVLFLRV	37,729	\$ 17.25	0.84%	-2.91%
107	3		DLBHFLKP	45,726	\$ 17.32	1.02%	-2.51%
108	3		BCRTFLSA	74,410	\$ 17.49	1.66%	-1.56%
109	3		MIAMFLNS	36,258	\$ 17.60	0.81%	-0.94%
110	3		FTLDFLJA	74,436	\$ 17.61	1.66%	-0.88%
111	3		WPBHFLGR	60,813	\$ 17.72	1.36%	-0.26%
112	3		GSVLFLNW	15,578	\$ 17.75	0.35%	-0.09%
113	3		EGLFLIH	22,251	\$ 17.78	0.50%	0.08%
114	3		ORLDFLPC	87,212	\$ 17.80	1.95%	0.19%
115	3		MICCFLLB	7,596	\$ 17.85	0.17%	0.47%
116	3		WPBHFLGA	104,805	\$ 17.86	2.34%	0.53%
117	3		FTLDFLPL	72,139	\$ 17.87	1.61%	0.58%
118	3		PNVDFLLA	24,100	\$ 17.97	0.54%	1.15%
119	3		ORLDFLSA	42,998	\$ 18.01	0.96%	1.37%
120	3		BYBHFLMA	77,402	\$ 18.04	1.73%	1.54%
121	3		MIAMFLLO	32,295	\$ 18.07	0.72%	1.71%
122	3		ORLDFLPH	117,491	\$ 18.26	2.63%	2.78%
123	3		NDADFLBR	59,976	\$ 18.29	1.34%	2.95%
124	3		FTLDFLWN	29,518	\$ 18.35	0.66%	3.28%
125	3		HLWDFLPE	113,722	\$ 18.37	2.54%	3.40%
126	3		HTISFLMA	23,535	\$ 18.47	0.53%	3.96%
127	3		COCOFLLM	29,133	\$ 18.54	0.65%	4.35%
128	3		BLGLFLMA	11,143	\$ 18.69	0.25%	5.20%
129	3		ORPKFLMA	30,289	\$ 18.75	0.68%	5.54%
130	3		ORLDFLAP	107,731	\$ 18.87	2.41%	6.21%
131	3		JCBHFLAB	15,439	\$ 18.88	0.35%	6.27%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
132	3		MNDRFLL0	46,577	\$ 18.89	1.04%	6.32%
133	3		PNCYFLMA	50,401	\$ 18.95	1.13%	6.66%
134	3		KYLRFLLS	10,075	\$ 19.15	0.23%	7.79%
135	3		STRFLMA	67,365	\$ 19.27	1.51%	8.46%
136	3		DYBHFLPO	52,960	\$ 19.33	1.18%	8.80%
137	3		DYBHFL0B	32,859	\$ 19.38	0.73%	9.08%
138	3		PTSLFLSO	20,109	\$ 19.40	0.45%	9.19%
139	3		STAGFLBS	13,800	\$ 19.40	0.31%	9.19%
140	3		PRRNFLMA	116,260	\$ 19.57	2.60%	10.15%
141	3		EGLLFLBG	49,414	\$ 19.70	1.10%	10.88%
142	3		PNSCFLFP	61,800	\$ 19.71	1.38%	10.94%
143	3		JCVLFLWC	45,636	\$ 19.82	1.02%	11.56%
144	3		JPTRFLMA	57,476	\$ 19.98	1.28%	12.46%
145	3		DBRYFLMA	8,181	\$ 20.00	0.18%	12.57%
146	3		DBRYFLDL	16,979	\$ 20.23	0.38%	13.87%
147	3		STAGFLMA	30,998	\$ 20.27	0.69%	14.09%
148	3		COCOFLMA	52,359	\$ 20.29	1.17%	14.20%
149	3		DELDFLMA	28,928	\$ 20.34	0.65%	14.49%
150	3		VRBHFLMA	52,762	\$ 20.40	1.18%	14.82%
151	3		JCVLFLNO	36,867	\$ 20.51	0.82%	15.44%
152	3		PAHKFLMA	3,900	\$ 20.71	0.09%	16.57%
153	3		NSBHFLMA	43,307	\$ 20.75	0.97%	16.79%
154	3		MLBRFLMA	105,838	\$ 20.81	2.37%	17.13%
155	3		GLBRFLMC	19,581	\$ 20.83	0.44%	17.24%
156	3		PNSCFLWA	35,294	\$ 20.83	0.79%	17.24%
157	3		PCBHFLNT	31,399	\$ 20.88	0.70%	17.52%
158	3		MRTHFLVE	15,124	\$ 20.97	0.34%	18.03%
159	3		SNFRFLMA	60,185	\$ 21.05	1.35%	18.48%
160	3		HBSDFLMA	12,025	\$ 21.06	0.27%	18.54%
161	3		KYLRFLMA	10,260	\$ 21.16	0.23%	19.10%
162	3		HMSTFLHM	39,717	\$ 21.27	0.89%	19.72%
163		Band 3 Summary		4,473,007	\$ 17.77	100%	
164	4		FLBHFLMA	5,756	\$ 21.33	1.00%	-10.38%
165	4		FTPRFLMA	63,485	\$ 21.69	11.07%	-8.87%
166	4		STAGFLSH	11,287	\$ 21.82	1.97%	-8.33%
167	4		PNSCFLPB	7,258	\$ 21.94	1.27%	-7.82%
168	4		OVIDFLCA	33,030	\$ 21.98	5.76%	-7.65%
169	4		HMSTFLAF	11,615	\$ 22.07	2.02%	-7.28%
170	4		FRBHFLFP	20,969	\$ 22.24	3.66%	-6.56%
171	4		MNDRFLLW	8,939	\$ 22.53	1.56%	-5.34%
172	4		TTVLFLMA	37,307	\$ 22.65	6.50%	-4.84%
173	4		JCVLFLLF	41,399	\$ 22.94	7.22%	-3.62%



A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines In Band	Percent Deviation From Average
174	4		PNCYFLCA	10,157	\$ 22.97	1.77%	-3.49%
175	4		WWSPFLSH	36,998	\$ 22.99	6.45%	-3.41%
176	4		PLCSFLMA	14,463	\$ 23.11	2.52%	-2.91%
177	4		ISLMFLMA	5,534	\$ 23.12	0.96%	-2.86%
178	4		LYHNFLOH	13,557	\$ 23.31	2.36%	-2.07%
179	4		PNSCFLHC	11,149	\$ 23.36	1.94%	-1.86%
180	4		WPBHFLRP	49,527	\$ 24.13	8.63%	1.38%
181	4		PTSLFLMA	44,164	\$ 24.18	7.70%	1.59%
182	4		SBSTFLMA	17,548	\$ 24.18	3.06%	1.59%
183	4		JCVLFLOW	20,234	\$ 24.62	3.53%	3.44%
184	4		CNTMFLLE	9,098	\$ 26.26	1.59%	10.33%
185	4		DLSPFLMA	2,629	\$ 26.30	0.46%	10.50%
186	4		HLNVFLMA	13,351	\$ 26.37	2.33%	10.79%
187	4		WWSPFLHI	16,799	\$ 26.76	2.93%	12.43%
188	4		BKVLFLJF	26,498	\$ 27.38	4.62%	15.03%
189	4		SBSTFLFE	1,795	\$ 27.42	0.31%	15.20%
190	4		OKHLFLMA	2,400	\$ 28.22	0.42%	18.56%
191	4		MLTNFLRA	23,249	\$ 28.41	4.05%	19.36%
192	4		PACEFLPV	13,498	\$ 28.46	2.35%	19.57%
193		Band 4 Summary		573,693	\$ 23.80	100%	
194	5		CDKYFLMA	1,578	\$ 28.70	1.05%	-11.73%
195	5		PLTKFLMA	21,599	\$ 29.10	14.33%	-10.50%
196	5		MDBGFLPM	14,799	\$ 30.21	9.82%	-7.08%
197	5		SGKYFLMA	5,064	\$ 30.36	3.36%	-6.62%
198	5		BGPFLMA	7,284	\$ 30.82	4.83%	-5.21%
199	5		LKCYFLMA	28,043	\$ 30.83	18.60%	-5.18%
200	5		GCSFFLCN	9,356	\$ 31.22	6.21%	-3.98%
201	5		HMSTFLEA	2,406	\$ 31.78	1.60%	-2.26%
202	5		HAVNFLMA	5,749	\$ 32.81	3.81%	0.91%
203	5		EORNFLMA	7,067	\$ 33.27	4.69%	2.33%
204	5		KYHGFLMA	7,390	\$ 34.23	4.90%	5.28%
205	5		DNLNFLWM	14,736	\$ 35.85	9.78%	10.26%
206	5		YULEFLMA	4,534	\$ 36.22	3.01%	11.40%
207	5		YNTWFLMA	3,109	\$ 36.52	2.06%	12.32%
208	5		ARCHFLMA	3,567	\$ 36.92	2.37%	13.55%
209	5		WELKFLMA	2,889	\$ 37.66	1.92%	15.83%
210	5		GENVFLMA	2,898	\$ 37.73	1.92%	16.04%
211	5		STAGFLWG	1,714	\$ 38.73	1.14%	19.12%
212	5		CHPLFLJA	6,948	\$ 38.79	4.61%	19.30%
213		Band 5 Summary		150,730	\$ 32.51	100%	
214	6		PMPKFLMA	3,468	\$ 39.30	5.50%	-13.20%
215	6		CFLDFLMA	6,109	\$ 39.86	9.69%	-11.96%

A	B	C	D	E	F	H	I
Row	Rate Band	Exchange	Wire Center	Total Lines Served	Monthly Cost (TELRIC)	Percent of Total Lines in Band	Percent Deviation From Average
216	6		FTGRFLMA	1,137	\$ 40.23	1.80%	-11.15%
217	6		PRSNFLFD	3,009	\$ 41.20	4.77%	-9.00%
218	6		HWTHFLMA	4,369	\$ 41.30	6.93%	-8.78%
219	6		BNNLFLMA	7,582	\$ 42.67	12.03%	-5.76%
220	6		NWBYFLMA	4,821	\$ 42.76	7.65%	-5.56%
221	6		TRENFLMA	5,109	\$ 43.70	8.11%	-3.48%
222	6		MXVFLMA	2,105	\$ 44.87	3.34%	-0.90%
223	6		CSCYFLBA	4,159	\$ 46.00	6.60%	1.60%
224	6		GCVLFLMA	4,279	\$ 48.02	6.79%	6.06%
225	6		MCNPFLMA	1,909	\$ 49.92	3.03%	10.26%
226	6		BRSNFLMA	3,788	\$ 50.41	6.01%	11.34%
227	6		BLDWFLMA	2,894	\$ 51.89	4.59%	14.61%
228	6		YNFNFLMA	3,470	\$ 53.05	5.51%	17.17%
229	6		OLTWFLLN	4,809	\$ 53.76	7.63%	18.74%
230		Band 6 Summary		63,017	\$ 45.28	100%	
231	7		JAY-FLMA	2,847	\$ 63.20	42.84%	-6.84%
232	7		VERNFLMA	2,040	\$ 67.33	30.70%	-0.76%
233	7		SYHSFLCC	1,759	\$ 75.95	26.47%	11.95%
234		Band 7 Summary		6,646	\$ 67.84	100.00%	
235	8		MNSNFLMA	629	\$ 115.81	100.00%	0.00%
236		Band 8 Summary		629	\$ 115.81	100%	