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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
SPRINT'S REBUTTAL TO BELLSOUTH'S REVISED
DIRECT TESTIMONY AND COST STUDY
OF
STEVEN M. MCMAHON

Q. Please state your name and business address.

A. My name is Steven M. McMahon. I am employed by Sprint/United Management Company as senior manager-Network Costing. My business address is 6360 Sprint Parkway, Overland Park, Kansas, 66251.

Q. Are you the same Steven M. McMahon that filed direct and rebuttal testimony in this proceeding?

A. Yes, I am.

Q. What is the purpose of this rebuttal testimony?

A. The purpose of this rebuttal testimony is to respond to the revised direct testimony and exhibits sponsored by BellSouth Telecommunications, inc. (BST) witnesses Alphonso J. Varner and D. Daonne Caldwell with regard to

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1 nonrecurring charges (NRCs) that BST has proposed in its
2 August 18, 2000, filing.

3 Q. Does BellSouth's revised direct testimony and August 18,
4 2000, revised cost study eliminate any of the concerns
5 you expressed in your refiled direct and rebuttal
6 testimony concerning the level of BellSouth's proposed
7 NRCs?

8

9 A. No.

10

11 Q. Has BellSouth proposed revised rates for its NRCs?

12

13 A. Yes.

14

15 Q. Are those revised NRCs based upon time estimates that are
16 more aligned with those to be expected of an efficient
17 LEC?

18

19 A. No.

20

21 Q. Can you give me an example of why even the proposed lower
22 NRCs are unreasonable?

23

24 A. Yes. The BellSouth revised Loop Qualification NRC goes
25 from \$189.37 to \$132.82. However, there are two reasons

1 why this BST charge is about five times greater than it
2 should be. (1) BST time for the service inquiry
3 function is 107 minutes. Sprint's time, on the other
4 hand, is 24 minutes for the same functions. And, (2) BST
5 time for the engineering function is 77 minutes vs.
6 Sprint's 35 minutes.

7
8 BST claims that it takes 107 minutes for a Systems
9 Designer and a Customer Point of Contact clerk to handle
10 the ordering process for loop qualification. Sprint's
11 comparable time of 24 minutes is a weighting of times
12 required to handle electronic (20 min) and manual (30
13 min) orders. Even if BST's order process is assumed to
14 be 100% manual, it is unrealistic for BST to take 107
15 minutes of front-office time to handle a simple loop
16 qualification order.

17
18 BST also claims that it takes 77 minutes for a Job Grade
19 57 and a Service Advocacy clerk to handle the engineering
20 process for loop qualification. Sprint's comparable time
21 is 35 minutes.

22
23 Q. Are there other NRCs for which BellSouth has proposed
24 lower rates?

25

1 A. Yes, but based upon my analysis of the proposed rates and
2 underlying time estimates, the rates proposed for those
3 NRCs are still too high, and the underlying time
4 estimates are still unreasonable. Because I have
5 previously addressed those rates and time estimates in my
6 refiled direct and rebuttal testimony, it would serve no
7 purpose to repeat my concerns and reasonings here.

8
9 Q. Has BellSouth proposed any new NRCs in its August 18,
10 2000, filing?

11
12 A. Yes. BellSouth has proposed two new NRCs related to
13 Unbundled Sub-Loop Modification.

14
15 Q. Does Sprint find these proposed NRCs to be reasonable?

16
17 A. No. Sprint finds that BellSouth's NRCs for Unbundled
18 Sub-Loop Modification use inflated work times and
19 questionable work steps. BellSouth has NRCs for both
20 load coil removal and bridged tap removal. In both those
21 NRCs, BellSouth claims 3.75 hours of engineering time is
22 necessary. Sprint believes that 3.75 hours of
23 engineering time is clearly excessive. This is ten times
24 the 0.375 hours BellSouth claims is necessary for short
25 loop modifications for load coils and bridged tap.

1 Sprint believes that engineering for loop and sub-loop
2 modifications should be similar. Similarly, BellSouth
3 claims 2.7 hours is necessary for connect & test for sub-
4 loop load coil removal, but that 0.924 hours is necessary
5 for loop load coil removal. Also, BellSouth claims 7.225
6 hours is necessary for connect & test for sub-loop
7 bridged tap removal, but that 0.925 hours is necessary
8 for loop bridged tap removal. Connect & test for loop
9 and sub-loop modifications should also be similar or the
10 same as for the entire loop.

11

12 Q. Does this conclude your rebuttal testimony?

13

14 A. Yes.

15