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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SPRINT'S REBUTTAL TO BELL SOUTH'S REVISED DIRECT TESTIMONY

OF

TALMAGE O. COX, III

Q. Please state your name, business address, employer and current position.

A. My name is Talmage O. Cox, III. My business address is 6360 Sprint Parkway, Overland Park, Kansas, 66251 I am employed as Manager of Service Cost for Sprint/United Management Company. I am testifying on behalf of Sprint-Florida, Inc. and Sprint Communications L.P. (hereafter referred to as "Sprint").

Q. Are you the same Talmage O. Cox, III that submitted direct and rebuttal testimony on behalf of Sprint?

A. Yes, I am.

Q. What is the purpose of your Testimony?

A. To clarify the deficiency of the interoffice transport costing process that BellSouth Telecommunications, Inc. (hereafter referred to as "BellSouth") utilized

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1 in the completion of their interoffice transport cost
2 studies filed August 18, 2000.

3

4 Q. Has BellSouth's position proposed by witnesses D.
5 Daonne Caldwell and Alphonso J. Varner concerning the
6 geographic deaveraging of transport changed with the
7 revised interoffice transport cost study filed August
8 18, 2000?

9

10 A. No. BellSouth's witnesses have proposed that it is
11 not necessary to deaverage interoffice transport cost
12 studies and that a per mile cost structure reflects
13 geographic deaveraging.

14

15 Q. Would the same conclusions put forth in your refiled
16 rebuttal testimony (filed August 21, 2000) still be
17 applicable with BellSouth's revised cost studies and
18 direct testimony filed August 18, 2000?

19

20 A. Yes. In reviewing BellSouth's August 18, 2000 filing,
21 the same conclusions apply as stated in my refiled
22 rebuttal testimony filed August 21, 2000.

23

24 Q. What are the conclusions from your refiled rebuttal
25 testimony filed August 21, 2000?

1

2 A. The following conclusions were identified as
3 deficiencies in BellSouth's interoffice transport cost
4 model.

5 • Does not reflect geographic-specific
6 characteristics.

7 • Does not reflect geographic-specific terminal
8 bandwidth.

9 • Does not reflect geographic-specific
10 utilization.

11 • Does not reflect the cost on a route-specific
12 basis by geographic area.

13 • Not in compliance with the FCC's requirement
14 that unbundled network elements be
15 geographically deaveraged into at least three
16 cost-related zones.

17 Based upon the above deficiencies the Florida Public
18 Service Commission should not approve the interoffice
19 transport cost results provided by BellSouth.

20

21 **Q. Does this conclude your testimony?**

22

23 A. Yes.