ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

VIA HAND DELIVERY

August 28, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of the Supplemental Rebuttal Testimony and Exhibits of William J. Barta on behalf of the Florida Cable Telecommunications Association. Copies have been served on the parties of record electronically and by overnight delivery.

Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

MAG/mj

Enclosure

cc: All Parties of Record
William J. Barta

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Supplemental Rebuttal Testimony and Exhibits of William J. Barta on behalf of the Florida Cable Telecommunications Association, in Docket 990649-TP have been served upon the following parties by overnight delivery and electronically this 28th day of August, 2000:

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Michael A. Gross

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

TALLAHASSEE, FLORIDA

In re: Investigation into pricing of unbundled network elements.	)))	Docket No. 990649-TP

SUPPLEMENTAL REBUTTAL TESTIMONY AND EXHIBITS OF WILLIAM J. BARTA

ON BEHALF OF THE

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION

HENDERSON RIDGE CONSULTING, INC.
CUMMING, GEORGIA
AUGUST 28, 2000

ORIGINAL

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

TALLAHASSEE, FLORIDA

In re: Investigation into pricing of unbundled network elements.	)))	Docket No. 990649-TP

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CUMMING, GEORGIA
AUGUST 28, 2000

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

TALLAHASSEE, FLORIDA

SUPPLEMENTAL REBUTTAL TESTIMONY OF

WILLIAM J. BARTA

DOCKET NO. 990649-TP

AUGUST 28, 2000

Q. Please state your name and business address.

A. My name is William Barta, and my business address is 7170 Meadow Brook Court, Cumming, Georgia, 30040.

Q. Have you previously submitted testimony in this proceeding?

Yes. I submitted prefiled testimony on June 8, 2000 and July 31, 2000 in this proceeding.

Q. On whose behalf are you testifying in this proceeding?

A. I am testifying on behalf of the Florida Cable Telecommunications Association ("the FCTA").

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to discuss certain revisions that BellSouth has incorporated in its latest cost studies submitted on August 16, 2000. Specifically, I wish to draw the attention of the Florida Public Service Commission ("the FPSC" or "the Commission") to the substantial increases in the nonrecurring rates

for certain unbundled network elements ("UNEs") that the Company has proposed from its initial cost filing in this docket.

Q. Please summarize your testimony.

A. BellSouth submitted its original cost study in this proceeding on April 17, 2000. The Company recently filed a revised cost study on August 16, 2000. In the most recent cost filing, BellSouth has proposed rates for 26 unbundled network elements that reflect increases in recurring and/or nonrecurring rates of 10% or more from the original cost study. The substantial increases in nonrecurring rates for many of the unbundled network elements are of particular concern. The nonrecurring rates that BellSouth charges alternative local exchange carriers can present formidable barriers to an ALEC's market entry depending upon their magnitude – especially in relationship to the existing market rate and customer churn for the service offering.

A comparison of the work activities and labor times underlying the nonrecurring costs for individual UNEs was conducted between the April 17, 2000 cost study and the August 16, 2000 cost filing. The results of the analysis indicate that BellSouth has expanded the work activities and/or materially increased the labor hours associated with a work activity for key unbundled network elements. One would not anticipate such significant changes in work activities and/or labor hours given that the Company relied upon studies less than six months apart. The significant percentage increases in the labor hours underlying the higher nonrecurring costs for several UNEs leads one to the conclusion that BellSouth is becoming less proficient at provisioning UNEs than it was just six months ago.

A comprehensive examination of the studies that have led to the substantial increases in the estimated nonrecurring costs should be undertaken. Absent the results of such an examination, the nonrecurring rates for unbundled network elements proposed by the Company in its April 17, 2000 cost study should be used as the basis for any Commission-ordered adjustments and/or modifications to BellSouth's proposed rates.

Q. Why did BellSouth submit revised cost studies?

A. According to BellSouth, several reasons led to the Company's decision to update its cost studies. The revised studies reflect modifications to the BellSouth Telecommunications, Inc. Loop Model ("BSTLM"). In addition, BellSouth found it necessary to revise its nonrecurring provisioning process for Digital Subscriber Line elements in order to be in conformance with the Federal Communications Commission's ("the FCC") 319 rules concerning access to loop qualification data. During its review of the Digital Subscriber Line provisioning practices, BellSouth revisited all of the nonrecurring inputs for all types of loops and, as a consequence, revised several inputs. Finally, the Company made certain corrections to the original study for such items as material prices, the gross receipts tax factor, and switching software model updates.

Q. What is the impact of the revisions on the proposed UNE rates?

A. The impact of the revisions on the proposed rates for most UNEs is negligible with only slight percentage increases or decreases from the rates developed in the original cost study. For a number of UNEs, however, there are substantial

changes in the proposed rates. Particularly troublesome is the magnitude of the percentage increases in the nonrecurring charges for UNEs that ALECs are likely to request in large volumes in their effort to become more competitive. A summary of the recurring and nonrecurring rates for UNEs that have changed by more than 10% from BellSouth's April 17, 2000 cost study is presented in Exhibit No.__(WJB-1).

Q. Why is the level of nonrecurring costs important to the alternative local exchange carriers?

A. The nonrecurring rates for UNEs charged by BellSouth are a cost of doing business to ALECs. The rates that the competitive carriers offer their retail customers must recover the nonrecurring fees paid to BellSouth. BellSouth's nonrecurring costs can present formidable barriers to an ALEC's market entry depending upon their magnitude -- especially in relationship to the existing market rate and customer churn for the service offering.

For instance, if an ALEC is assessed a $350 nonrecurring charge for a UNE that is necessary to provision a service with a monthly revenue stream of $40, then the ALEC must retain the customer for a period of nearly 9 months simply to recover the nonrecurring fees paid to BellSouth. But, in actuality, the breakeven period will be much longer as the ALEC will also be charged recurring costs by BellSouth for the UNE in addition to the expenses it incurs for its internal operations (e.g. sales and marketing, customer service, corporate overhead, etc.). Higher than necessary nonrecurring charges lengthen the payback period and increase the ALEC's business risk.

Q. Why has the Company revised the proposed nonrecurring costs for UNEs from its original cost filing?

A. According to BellSouth's witness, Ms. Daonne Caldwell, the revisions to the proposed nonrecurring rates reflect changes for a number of reasons, including the dispatch rate, the extent of provisioning activities, and true-ups for certain elements:

> "All nonrecurring costs for non-loop elements decreased due to the decrease in gross receipts tax. Nonrecurring costs associated with service level ('SL') 1 and SL2 loops increased mainly as a result of an increase in the dispatch rate. The sub-loop feeder has been reclassified as a designed loop, which involves more provisioning activities and thus increased nonrecurring costs. Other elements that increased in cost include Cross Box Facility Set-up, Network Interface Device ('NID') Cross Connect, and Integrated Services Digital Network ('ISDN') loops. These increases resulted from a truing-up of the inputs and provisioning processes" (August 18, 2000 prefiled testimony, page 6, lines 9 through 17).

Q. Have you reviewed the revised rates for nonrecurring costs that the Company has proposed in its most recent cost study?

A. Yes. My review consisted of comparing the work activities and corresponding labor times underlying the nonrecurring costs for UNEs that experienced a percentage change of 10% or greater from BellSouth's original cost filing. The

work activities and associated labor times are major drivers of the Company's nonrecurring cost estimates. My analysis particularly focused on the 2-wire analog voice grade loops and sub-loop feeder unbundled network elements. In the near term, the 2-wire analog voice grade loop is likely to be a highly requested UNE by alternative carriers. As the market evolves and more infrastructure is deployed, the ALECs may begin to submit a greater number of requests for sub-loop UNEs.

Q. How many unbundled network elements were changed by 10% or more due to the Company's revisions to its original cost study?

A. The recurring and/or nonrecurring rates for 26 UNEs were changed by 10% or more as a result of the revisions to the Company's original cost study. Of this group of 26 unbundled network elements, the revisions to 20 UNEs resulted in changes in the nonrecurring costs. More importantly, the changes in the estimated nonrecurring costs for 13 unbundled network elements represented rate increases of 10% or more.

Q. What were the results of your analysis of the 2-wire analog voice grade loop and sub-loop elements?

A. Revisions to the work activities and/or estimated labor hours from the Company's original cost study produced significant increases in the estimated nonrecurring costs for a 2-wire analog voice grade loop – Service Level 1 and 2 (i.e. UNE codes A.1.1 and A.1.2, respectively). Both installation and disconnect rates for these elements experienced sharp increases.

The UNE A.1.1 labor hours for first installation and additional installation experienced an increase of 37.12% and 74.60%, respectively, from the Company's original cost study. The initial disconnect and additional disconnect labor hours rose 38.75% and 71.79%, respectively from the original cost study.

The percentage increase in the labor hours underlying the nonrecurring rates for a 2-wire analog voice grade loop – Service Level 2 (i.e. UNE code A.1.2) was more dramatic than the increase in UNE A.1.1 labor hours. First installation and additional installation labor hours for UNE A.1.2 increased 59.12% and 38.11%, respectively, from the Company's original cost study. The initial disconnect and additional disconnect labor hours rose 121.46% and 139.15%, respectively.

The Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop unbundled network element (i.e. UNE code A.2.1) also experienced significant percentage increases in installation and disconnect labor hours. First installation and additional installation labor hours rose 50.79% and 139.06%, respectively, while additional disconnect labor hours increased 39.06% from the original cost study. The Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop additional installation hours increased 13.82% from the Company's original cost study.

A comparison of the installation and disconnect labor hours between the Company's original cost study and its revised cost study for UNEs A.1.1, A.1.2, A.2.1, and A.2.2 is presented by Job Function Code ("JFC") in Exhibit No.__(WJB-2) through Exhibit No.__(WJB-5).

Q. What conclusions did you draw from the results of your analysis?

A. The sharp increase in labor hours directed towards installation and disconnect activities is surprising given the time estimates developed in the Company's original cost study. The nonrecurring cost studies supporting the April 17, 2000 cost filing were conducted in March 2000 while the August 16, 2000 cost study reflected the results of studies conducted in July 2000. One would not anticipate such significant changes in work activities and/or labor hours in such a brief time period. The significant percentage increases in the labor hours underlying the higher nonrecurring costs for several UNEs leads one to the conclusion that BellSouth is becoming less proficient at provisioning UNEs than it was just six months ago.

Q. What is your recommendation regarding the large percentage increases in the nonrecurring rates for unbundled network elements proposed by BellSouth?

A. The Commission would benefit from a comprehensive examination of the studies that have led to the substantial increases in the estimated nonrecurring costs. Absent the results of such an examination, the nonrecurring rates for unbundled network elements proposed in the Company's April 17, 2000 cost filing should be used as the basis for any adjustments and/or modifications ordered by the Commission.

Q. Does this conclude your testimony?

A. Yes.

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

TALLAHASSEE, FLORIDA

In re: Investigation into pricing of unbundled network elements.	)))	Docket No. 990649-TP

EXHIBITS

OF

WILLIAM J. BARTA

ON BEHALF OF THE

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION

HENDERSON RIDGE CONSULTING, INC.
CUMMING, GEORGIA
AUGUST 28, 2000

Florida Public Service Commission
Docket No. 990649-TP

BellSouth Revised Cost Studies
Submitted August 16, 2000

UNE Rates with differences of 10% or more from April 17, 2000 Cost Study

Cost Element	Element Description	Recurring Costs	Nonrecurring Costs: First Installation	Nonrecurring Costs: Additional Installation	Nonrecurring Costs: First Disconnect	Nonrecurring Costs: Additional Disconnect
A.1.1	2-Wire Analog Voice Grade Loop - Service Level 1		36.73%	70.07%	40.59%	68.02%
A.1.2	2-Wire Analog Voice Grade Loop - Service Level 2		72.82%	51.43%	145.21%	155.02%
A.2.1	Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop	30.46%	57.03%	143.59%	15.45%	46.38%
A.2.2	Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop			13.82%		
A.2.11	Sub-Loop Distribution Per 4-Wire Analog Voice Grade Loop	20.08%				
A.2.13	Network Interface Device Cross Connect		23.74%	23.74%		
A.2.14	2-Wire Intrabuilding Network Cable (INC)		-16.12%		-16.95%	-33.37%
A.2.15	4-Wire Intrabuilding Network Cable (INC)		-28.22%		-16.95%	-14.38%
A.2.24	Sub-Loop - Per 4-Wire Analog Voice Grade Loop/Feeder Only					30.23%
A.2.25	Sub-Loop - Per 2-Wire ISDN Digital Grade Loop/Feeder Only		11.04%	36.52%		23.61%
A.2.29	Sub-Loop - Per 4-Wire 56 or 64 Kbps Digital Grade Loop/Feeder Only					30.23%
A.2.42	Sub-Loop - Per 4-Wire Copper Loop Short Distribution Only				-13.10%	
A.4.1	4-Wire Analog Voice Grade Loop					38.98%
A.5.1	2-Wire ISND Digital Grade Loop			26.65%		17.33%
A.9.2	Sub-Loop Feeder Per 4-Wire DS1 Digital Loop					30.83%
A.10.1	4-Wire 19, 56 or 64 Kbps Digital Grade Loop					38.98%
A.12.5	Unbundled Sub-Loop Concentration - USLC Feeder Interface					30.83%
A.17.4	Unbundled Loop Modification - Additive		-52.07%	-52.07%		
A.18.5	Channelization - Channel System DS3 to DS1			-37.17%	-67.39%	-68.35%
B.1.3	Exchange Ports - 2-Wire DID Port					-21.24%
B.1.4	Exchange Ports - DDITS Port					-96.64%
D.5.1	Local Channel - Dedicated - 2-Wire Voice Grade	13.95%				
D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade	13.32%				
D.5.24	Local Channel - Dedicated - DS1	11.68%				
I.4.3	Service Provider Number Portability RI-PH, Per Number Ported	-29.67%				
J.3.1	Mechanized Loop Make-up	-36.22%				

Florida Public Service Commission
Docket No. 990649-TP

BellSouth Unbundled Network Element Cost Study
2-Wire Analog Voice Grade Loop - Service Level 1
Nonrecurring Costs Analysis

First Installation Time		Estimated Labor Hours		
Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	JG57	0.0004	0.1000	-0.0996
Engineering	WS16	0.0045	0.0000	0.0045
Engineering	4M1X	0.0400	0.0058	0.0342
Engineering	JG57	0.0750	0.0000	0.0750
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Test	4AXX	0.4640	0.4490	0.0150
Connect & Test	4WXX	0.2500	0.2500	0.0000
Connect & Test	431X	0.2125	0.2125	0.0000
Connect & Test	410X	0.8152	0.3842	0.4310
Travel	410X	0.1267	0.0667	0.0600
Total A.1.1		2.0133	1.4682	0.5451

Additional Installation Time		Estimated Labor Hours		
Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	JG57	0.0004	0.1000	-0.0996
Engineering	WS16	0.0045	0.0000	0.0045
Engineering	4M1X	0.0400	0.0058	0.0342
Engineering	JG57	0.0750	0.0000	0.0750
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Test	4AXX	0.0000	0.0000	0.0000
Connect & Test	4WXX	0.0000	0.0000	0.0000
Connect & Test	431X	0.1133	0.1133	0.0000
Connect & Test	410X	0.5682	0.2542	0.3140
Travel	410X	0.0000	0.0000	0.0000
Total A.1.1		0.8264	0.4733	0.3531

Florida Public Service Commission
Docket No. 990649-TP

BellSouth Unbundled Network Element Cost Study
2-Wire Analog Voice Grade Loop - Service Level 1
Nonrecurring Costs Analysis

First Disconnect Time		Estimated Labor Hours		
Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	WS16	0.0000	0.0000	0.0000
Engineering	4M1X	0.0058	0.0058	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Test	4AXX	0.4323	0.4323	0.0000
Connect & Test	4WXX	0.2500	0.2500	0.0000
Connect & Test	431X	0.1700	0.1700	0.0000
Connect & Test	410X	0.3325	0.0000	0.3325
Travel	410X	0.0000	0.0000	0.0000
Total A.1.1		1.1906	0.8581	0.3325

Additional Disconect Time		Estimated Labor Hours		
Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	WS16	0.0000	0.0000	0.0000
Engineering	4M1X	0.0058	0.0058	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Test	4AXX	0.0000	0.0000	0.0000
Connect & Test	4WXX	0.0000	0.0000	0.0000
Connect & Test	431X	0.1133	0.1133	0.0000
Connect & Test	410X	0.0855	0.0000	0.0855
Travel	410X	0.0000	0.0000	0.0000
Total A.1.1		0.2046	0.1191	0.0855

Florida Public Service Commission
Docket No. 990649-TP

BellSouth Unbundled Network Element Cost Study
2-Wire Analog Voice Grade Loop - Service Level 2
Nonrecurring Costs Analysis

First Installation Time

Labor Expense Descriptio	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4N4X	0.0825	0.0825	0.0000
Engineering	JG57	0.0004	0.0250	-0.0246
Engineering	WS16	0.0045	0.2750	-0.2705
Engineering	4M1X	0.0400	0.0058	0.0342
Engineering	JG57	0.0750	0.1000	-0.0250
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Test	4AXX	1.6956	1.6289	0.0667
Connect & Test	4WXX	0.2500	0.2500	0.0000
Connect & Test	431X	0.2833	0.2833	0.0000
Connect & Test	411X	2.1452	0.3842	1.7610
Travel	411X	0.3333	0.0667	0.2666
Total A.1.2		4.9348	3.1014	1.8334

Additional Installation Time

Labor Expense Descriptio	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4N4X	0.0450	0.0450	0.0000
Engineering	JG57	0.0004	0.0250	-0.0246
Engineering	WS16	0.0045	0.2750	-0.2705
Engineering	4M1X	0.0400	0.0058	0.0342
Engineering	JG57	0.0750	0.1000	-0.0250
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Test	4AXX	1.2394	1.3734	-0.1340
Connect & Test	4WXX	0.0000	0.0000	0.0000
Connect & Test	431X	0.1417	0.1417	0.0000
Connect & Test	411X	1.4952	0.2542	1.2410
Travel	411X	0.0000	0.0000	0.0000
Total A.1.2		3.0662	2.2201	0.8461

Florida Public Service Commission
Docket No. 990649-TP

BellSouth Unbundled Network Element Cost Study
2-Wire Analog Voice Grade Loop - Service Level 2
Nonrecurring Costs Analysis

First Disconnect Time

Labor Expense Descriptio	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4N4X	0.0442	0.0442	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	WS16	0.0000	0.0000	0.0000
Engineering	4M1X	0.0058	0.0058	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Test	4AXX	0.4823	0.4823	0.0000
Connect & Test	4WXX	0.2500	0.2500	0.0000
Connect & Test	431X	0.2125	0.2125	0.0000
Connect & Test	411X	0.8750	0.0000	0.8750
Travel	411X	0.3333	0.0000	0.3333
Total A.1.2		2.2031	0.9948	1.2083

Additional Disconect Time

Labor Expense Descriptio	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4N4X	0.0067	0.0067	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	WS16	0.0000	0.0000	0.0000
Engineering	4M1X	0.0058	0.0058	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Test	4AXX	0.0500	0.0500	0.0000
Connect & Test	4WXX	0.0000	0.0000	0.0000
Connect & Test	431X	0.0992	0.0992	0.0000
Connect & Test	411X	0.2250	0.0000	0.2250
Travel	411X	0.0000	0.0000	0.0000
Total A.1.2		0.3867	0.1617	0.2250

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Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop
Nonrecurring Costs Analysis

First Installation Time

Labor Expense Descriptio	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4N4X	0.0825	0.0000	0.0825
Engineering	JG57	0.0004	0.0000	0.0004
Engineering	WS16	0.0045	0.0000	0.0045
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0750	0.1000	-0.0250
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Turn-Up Test	4AXX	1.6956	0.5157	1.1799
Connect & Turn-Up Test	4WXX	0.2500	0.2500	0.0000
Connect & Turn-Up Test	431X	0.2125	0.2125	0.0000
Connect & Turn-Up Test	411X	1.6158	1.3917	0.2241
Travel	411X	0.3333	0.3333	0.0000
Total A.2.1		4.4279	2.9365	1.4914

Additional Installation Time

Labor Expense Description				
Engineering	4N4X	0.0450	0.0000	0.0450
Engineering	JG57	0.0004	0.0000	0.0004
Engineering	WS16	0.0045	0.0000	0.0045
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0750	0.1000	-0.0250
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Turn-Up Test	4AXX	1.2394	0.0000	1.2394
Connect & Turn-Up Test	4WXX	-	0.0000	0.0000
Connect & Turn-Up Test	431X	0.1133	0.1133	0.0000
Connect & Turn-Up Test	410X	0.9658	0.7417	0.2241
Travel	410X	-	0.0000	0.0000
Total A.2.1		2.6017	1.0883	1.5134

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Nonrecurring Costs Analysis

First Disconnect Time Labor Expense Descriptio	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4N4X	0.0442	0.0000	0.0442
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	WS16	0.0000	0.0000	0.0000
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Turn-Up Test	4AXX	0.4823	0.4323	0.0500
Connect & Turn-Up Test	4WXX	0.2500	0.2500	0.0000
Connect & Turn-Up Test	431X	0.1700	0.1700	0.0000
Connect & Turn-Up Test	410X	0.0000	0.7833	-0.7833
Connect & Turn-Up Test	411X	0.8750	0.0000	0.8750
Travel	410X	0.0000	0.3333	-0.3333
Travel	411X	0.3333	0.0000	0.3333
Total A.2.1		2.2881	2.1022	0.1859

Additional Disconnect Time Labor Expense Description				
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4NAX	0.0067	0.0000	0.0067
Engineering	WS16	0.0000	0.0000	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Turn-Up Test	4AXX	0.0500	0.0000	0.0500
Connect & Turn-Up Test	4WXX	0.0000	0.0000	0.0000
Connect & Turn-Up Test	431X	0.1133	0.1133	0.0000
Connect & Turn-Up Test	410X	0.0000	0.1333	-0.1333
Connect & Turn-Up Test	411X	0.2250	0.0000	0.2250
Travel	410X	0.0000	0.0000	0.0000
Travel	411X	0.0000	0.0000	0.0000
Total A.2.1		0.5283	0.3799	0.1484

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BellSouth Unbundled Network Element Cost Study
Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop
Nonrecurring Costs Analysis

First Installation Time

Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0750	0.1000	-0.0250
Engineering	4FXX	0.0250	0.0000	0.0250
Connect & Test	4AXX	0.5157	0.5157	0.0000
Connect & Test	4WXX	0.2500	0.2500	0.0000
Connect & Test	411X	1.7460	1.6960	0.0500
Travel	411X	0.3333	0.3333	0.0000
Total A.2.2		3.0783	3.0283	0.0500

Additional Installation Time

Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0750	0.1000	-0.0250
Engineering	4FXX	0.0250	-	0.0250
Connect & Test	4AXX	-	-	0.0000
Connect & Test	4WXX	-	-	0.0000
Connect & Test	411X	1.0960	1.0460	0.0500
Travel	411X	-	-	0.0000
Total A.2.2		1.3293	1.2793	0.0500

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BellSouth Unbundled Network Element Cost Study
Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop
Nonrecurring Costs Analysis

First Disconnect Time

Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Test	4AXX	0.4323	0.4323	0.0000
Connect & Test	4WXX	0.2500	0.2500	0.0000
Connect & Test	411X	0.7833	0.7833	0.0000
Travel	411X	0.3333	0.3333	0.0000
Total A.2.2		1.9322	1.9322	0.0000

Additional Disconnect Time

Labor Expense Description	JFC	August 16, 2000	April 17, 2000	Difference
Engineering	4M1X	0.1333	0.1333	0.0000
Engineering	JG57	0.0000	0.0000	0.0000
Engineering	4FXX	0.0000	0.0000	0.0000
Connect & Test	4AXX	0.0000	0.0000	0.0000
Connect & Test	4WXX	0.0000	0.0000	0.0000
Connect & Test	411X	0.1333	0.1333	0.0000
Travel	411X	0.0000	0.0000	0.0000
Total A.2.2		0.2666	0.2666	0.0000