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February 23, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

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Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of AT&T Communications of the Southern States, Inc., TCG South Florida, MediaOne Florida Telecommunications, Inc., Allegiance Telecom of Florida, Inc., Global NAPs, Inc., Time Warner Telecom of Florida, L.P., Florida Cable Telecommunications Association, Inc., and Florida Competitive Carriers Association are an original and fifteen copies of the Revised pages 23 and 24 of the Prefiled Direct Testimony of Lee L. Selwyn filed on December 1, 2000. Copies of these revised pages were previously provided to the parties and Commission Staff at the Prehearing Conference on February 14, 2001.

The Revised pages 23 and 24 of Mr. Selwyn's Prefiled Direct Testimony incorporate the correct current intrastate switched access charges of BellSouth Telecommunications, Inc. in Florida. These corrections alter the previously filed calculations on page 23, line 13 (from "\$7.14" to "\$16.48") and page 23, line 18 (from "\$27" to "\$36"), and the corresponding calculations contained in table 1 on page 24, line 7.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

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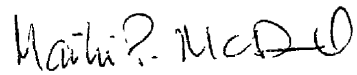
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Page 2
February 23, 2001

Thank you for your assistance with this filing.

Sincerely,

A handwritten signature in black ink that reads "Martin P. McDonnell". The signature is written in a cursive style with a large, stylized "M" and "D".

Martin P. McDonnell

MPM/rl
Enclosures
cc: All Parties of Record

1 services" (that is, what carriers such as IXCs provide) to be mutually exclusive.⁶

2 Indeed, the D.C. Circuit noted that conclusion in its discussion of the proper

3 classification of ISPs and ISP-bound calls noted above.

4 Q. What would be the effect upon Internet users if ISPs were required to pay for
5 the incoming calls they receive?

6

7 A. Most ISPs today employ a flat-rate type of pricing plan whereby users pay a
8 fixed monthly charge for unlimited access to the Internet. According to
9 industry statistics, the average dial-up Internet user spends approximately 25
10 hours per month on the Internet. As shown in Table 1, if BellSouth's current
11 intrastate switched access charges in Florida were to apply for each of these
12 1500 minutes per month, assuming an average call duration of 30 minutes,
13 the ISP would be required to pay some \$16.48 for each customer to receive
14 calls for which those customers had already paid in their local telephone
15 service rate. Obviously, ISPs would be forced to flow-through these
16 additional costs to their Internet user customers, effectively increasing the
17 cost of Internet access from the roughly \$20 per month that typically applies
18 today to as much as \$36 per month. Moreover, once faced with usage-based
19 call termination charges, the ISPs may find it far more difficult to offer
20 flat-rate Internet access, and would be forced to adopt measured-use pricing,
21 something that would fundamentally alter the manner in which the Internet is

6.Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report to Congress, 13 FCC Rcd 11501, 11536-11540 (1998).

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Corrected 2/12/01	
<p>Table 1</p> <p>Calculation of Potential Impact on Internet Users of Application of BellSouth Florida's Intrastate Switched Access Charges to ISP-bound calls</p>	
Average monthly connect time of Internet user, hours	25
Average duration of Internet calls, minutes	30
Total minutes per month:	1500
BellSouth-Florida's Intrastate SWAC: Source: BellSouth-Florida Access Services Tariff, Section E.6 (BellSouth SWA Service)	
Local Switching LS2 (Feature Groups C and D):	
Per access minute	\$ 0.008128
Tandem switching, per access minute:	\$ 0.00050
Tandem switched transport, per access minute:	
Facilities Termination (fixed charge) per access minute of use:	\$ 0.00036
Per Mile per access minute of use:	\$ 0.00004
Assumed transport mileage	50
Total monthly charges if SWAC applied to ISP-bound traffic terminated by CLEC:	
LS2 charges	\$ 12.19
Tandem switching charges	\$ 0.75
Tandem transport charges	\$ 3.54
Total monthly charges:	\$ 16.48
<p>Note: This assumes that call is handed off to a CLEC for termination, so it includes (only) originating local switching, plus transport and tandem switching elements.</p>	

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Q. Some ILECs have contended that ISPs provide an interexchange function in terminating calls to the Internet, and that therefore the toll model is the most