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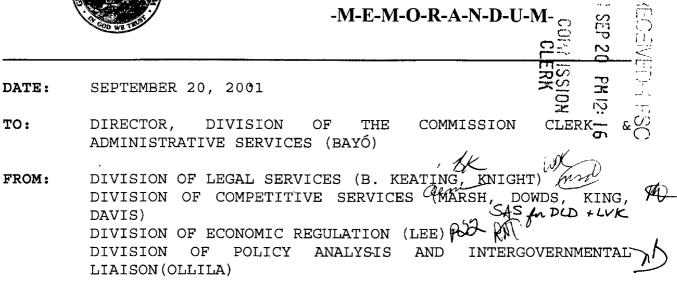
Public Service Commission

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-M-E-M-O-R-A-N-D-U-M-

DATE: SEPTEMBER 20, 2001

TO: DIRECTOR, DIVISION OF THE COMMISSION CLERK & ADMINISTRATIVE SERVICES (BAYÓ)

FROM: DIVISION OF LEGAL SERVICES (B. KEATING, KNIGHT)
DIVISION OF COMPETITIVE SERVICES (MARSH, DOWDS, KING, DAVIS)
DIVISION OF ECONOMIC REGULATION (LEE)
DIVISION OF POLICY ANALYSIS AND INTERGOVERNMENTAL LIAISON (OLLILA)

RE: DOCKET NO. 990649-TP - INVESTIGATION INTO PRICING OF UNBUNDLED NETWORK ELEMENTS.

AGENDA: OCTOBER 2, 2001 - REGULAR AGENDA - MOTIONS FOR RECONSIDERATION AND MOTION TO CONFORM ANALYSIS - ORAL ARGUMENT NOT REQUESTED - PARTICIPATION LIMITED TO COMMISSIONERS AND STAFF

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\LEG\WP\990649.RCM

CASE BACKGROUND

On December 10, 1998, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCIMetro Access Transmission Services, LLC and WorldCom Technologies, Inc. (WorldCom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), Intermedia Communications Inc. (Intermedia), Supra Telecommunications and Information Systems (Supra), Florida Digital Network, Inc. (Florida Digital Network), and Northpoint Communications, Inc. (Northpoint) (collectively, "Competitive Carriers") filed their Petition of

Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. Among other matters, the Competitive Carriers' Petition asked that we set deaveraged unbundled network element (UNE) rates. The petition was addressed in Docket No. 981834-TP.

On May 26, 1999, the Commission issued Order No. PSC-99-1078-PCO-TP, granting in part and denying in part the Competitive Carriers' petition. Specifically, the Commission granted the request to open a generic UNE pricing docket for the three major incumbent local exchange providers, BellSouth Telecommunications, Inc. (BellSouth), Sprint-Florida, Incorporated (Sprint), and GTE Florida Incorporated (GTEFL). Accordingly, this docket was opened to address the deaveraged pricing of UNEs, as well as the pricing of UNE combinations and nonrecurring charges. An administrative hearing was held on July 17, 2000, on the Part One issues identified in Order No. PSC-00-2015-PCO-TP, issued June 8, 2000. Part Two issues, also identified in Order No. PSC-00-2015-PCO-TP, were heard in an administrative hearing on September 19-22, 2000.

On May 25, 2001, the Commission issued its Final Order on Rates for Unbundled Network Elements Provided by BellSouth. Within the Order, the Commission addressed the appropriate methodology, assumptions, and inputs for establishing rates for unbundled network elements for BellSouth Telecommunications. The Commission ordered that the identified elements and subloop elements be unbundled for the purpose of setting prices, and that access to those subloop elements shall be provided. The Commission also determined that the inclusion of non-recurring costs in recurring rates should be considered where the resulting level of non-recurring charges would constitute a barrier to entry. In addition, the Commission defined xDSL-capable loops, and found that a cost study addressing such loops may make distinctions based upon loop length. It then set forth the UNE rates, and held that they shall become effective when existing interconnection agreements are amended to incorporate the approved rates, and those agreements become effective. Furthermore, the Commission ordered BellSouth to refile, within 120 days of the issuance of the Order, revisions to its cost study addressing xDSL-capable loops, network interface devices, and cable engineering and installation. The parties to the proceeding were also ordered to refile within 120 days of the issuance of the Order, proposals addressing network reliability and security concerns as they pertain to access to subloop elements.

On June 11, 2001, BellSouth filed its Motion for Reconsideration, requesting that the Commission reconsider its decision in six respects. Specifically, BellSouth argues that the Commission should reconsider its decisions regarding: (1) BellSouth's inflation adjustment; (2) the proposed hybrid copper/fiber xDSL-capable loop; (3) the provision of a "guaranteed" copper SL-1 loop; (4) the recovery of loop conditioning costs on loops less than 18,000 feet in length; (5) network interface device (NID) costs; and (6) Service Advocacy Center time discrepancies. Also on June 11, 2001, MCI WorldCom, AT&T, Covad, and Z-Tel (Movants) filed a Motion for Reconsideration and Clarification of certain decisions in the Order. They assert that the use of three cost scenarios violates the FCC's TELRIC rules. They also seek clarification of the relationship between costing for UNEs and USF purposes. The Movants also asked the Commission to reconsider its positions on shared cost allocation and drop routing. On June 18, 2001, BellSouth timely filed its Memorandum in Opposition to the Movant's Motion for Reconsideration and Clarification, disputing their assertions. On June 25, 2001, AT&T, MCI WorldCom, Covad, and Rhythms Links Inc. (ALECs) timely submitted their Response in Opposition to BellSouth's Motion for Reconsideration, responding to only four of the six items for which BellSouth requested consideration. Sprint also filed a Response to BellSouth's Motion for Reconsideration that same day. Sprint responds only to BellSouth's Motion as it pertains to the adjustment to the inflation factor.

On June 26, 2001, BellSouth filed a Motion to Conform Staff Analysis and Cost Model Run to Order No. PSC-01-1181-FOF-TP. In its motion, BellSouth asserts that there are several inconsistencies between the Commission staff's cost model run and the Commission's order, particularly relating to Shared and Common Cost factors, the elimination of inflation in the context of Plant Specific factors, the economic life of analog switching, and the proposed lives for Submarine Fiber Cable. No responses to this Motion were filed.

Appendix A to this recommendation contains the rates that result from staff's recommended changes to the model. Appendix B contains the wire centers for each zone that correspond to the proposed rates.

JURISDICTION

Staff notes that due to the everchanging state of the law in this area, the applicable law and jurisdiction for this docket has been a moving target. Further action may be needed at a future date with regard to BellSouth's UNE rates. Nevertheless, this Commission has jurisdiction to act in this proceeding pursuant to Section 251 and 252 of the Telecommunications Act of 1996 and Sections 364.161 and 364.162, Florida Statutes.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission grant BellSouth's Motion for Reconsideration?

RECOMMENDATION: The Motion for Reconsideration should be granted, in part, and denied, in part, as set forth in the Staff Analysis. Furthermore, clarification regarding references to hybrid fiber/copper loops and BellSouth's ability to submit support for costs, if any, associated with tagging xDSL-capable loops should be provided as set forth in the following Staff Analysis. **(KEATING, MARSH, LEE, KING, DOWDS, OLLILA)**

STAFF ANALYSIS: The standard of review for a motion for reconsideration is whether the motion identifies a point of fact or law which was overlooked or which the Commission failed to consider in rendering its Order. See Stewart Bonded Warehouse, Inc. v. Bevis, 294 So. 2d 315 (Fla. 1974); Diamond Cab Co. v. King, 146 So. 2d 889 (Fla. 1962); and Pingree v. Quaintance, 394 So. 2d 161 (Fla. 1st DCA 1981). In a motion for reconsideration, it is not appropriate to reargue matters that have already been considered. Sherwood v. State, 111 So. 2d 96 (Fla. 3rd DCA 1959); citing State ex. rel. Jaytex Realty Co. v. Green, 105 So. 2d 817 (Fla. 1st DCA 1958). Furthermore, a motion for reconsideration should not be granted "based upon an arbitrary feeling that a mistake may have been made, but should be based upon specific factual matters set forth in the record and susceptible to review." Stewart Bonded Warehouse, Inc. v. Bevis, 294 So. 2d 315, 317 (Fla. 1974).

A.   Inflation Factors

BellSouth argues that the Commission considered evidence in the record that was clearly erroneous in rendering its decision, particularly the testimony of Sprint witness Dickerson. BellSouth further contends that there is no (accurate) evidence in the record to support the Commission's decision on this point.

BellSouth contends that witness Dickerson totally misunderstands BellSouth's use of inflation factors. Where witness Dickerson claims that the same methodology that is used to develop the Plant-Specific expense factor is also used in the application of inflation to investment, BellSouth views these as two entirely different exercises. BellSouth explains that the Plant-Specific factor is a ratio of expenses to investment. The company contends

that the investment also reflects growth in demand, inflation, and productivity, but the relationship between the expenses and investment is consistent over the three-year measuring period. BellSouth also points out that the Plant-Specific factor in developed based upon investments that reflect the existing network, not the least-cost, forward-looking network considered in the cost study.

BellSouth further contends that witness Dickerson mislabeled the Growth Rate as the Inflation Adjustment Factor, and incorrectly asserted that BellSouth applies growth in access lines to its inflation calculation. While noting that this apparent misinterpretation has already been recognized, BellSouth states that the Commission's Order is also incorrect in that it also identified a slight mismatch between inflation-adjusted material costs and the demand levels utilized in BellSouth's cost study. It also re-asserts its argument that material and labor rates will be increasing over a three-year time period, and so inflation is also appropriate for the development of levelized labor rates.

In response, the ALECs argue that BellSouth has failed to identify a mistake of fact or law in the Commission's decision. They refer to the Final Order, which states in part:

> [W]e shall approve the loading factors proposed by BellSouth, with the exception of its proposed inflation factors. Regarding the inflation factors, we are persuaded that the application of inflation results in an inappropriate mismatch of as much as 18 months between the inflation-adjusted material costs and the demand levels utilized in BellSouth's cost study. Thus, in [an] effort to reduce or eliminate this mismatch, the proposed inflation factors are rejected.

UNE Final Order at 306. In ordering BellSouth to refile its cost studies within 120 days, they contend that the Commission did give BellSouth an opportunity to address the perceived mismatch, stating: 'to the extent BellSouth can come forward with information in its refiling indicating an appropriate inflation adjustment that eliminates the growth mismatch we will consider that information at that time." Id. at 307. The ALECs point out that BellSouth repeatedly refers to evidence in the record upon which the Commission based its decision. By raising this issue on

reconsideration, the ALECs contend that BellSouth merely reargues matters that the Commission considered and rejected.

Further, the ALECs contend that the proposed inflation factor was properly rejected. They argue that BellSouth is asking the Commission to accept an inflation factor which, by its own admission, is not TELRIC based, and thus violates the Act. They argue that the Commission's rejection is, therefore, consistent with the Act.

Sprint contends that BellSouth's motion in its entirety should be rejected, because the Commission neither overlooked nor failed to consider certain evidence applicable to the issues put forth in its motion. Sprint asserts that BellSouth is not only rearguing issues, but attempting to bring up new arguments on the pretext of responding to the Commission's offer to entertain new inflation adjustments that eliminate the mismatch, in its 120 day filing. Sprint claims that the arguments that BellSouth puts forth do not eliminate a mismatch. Rather, Sprint contends, BellSouth is singular in its failure to grasp the testimony of Mr. Dickerson. Sprint argues that the Commission's Order evidences a clear understanding of Mr. Dickerson's concerns, where it states:

> Witness Dickerson argues that increases in future equipment costs very well may be accompanied by equipment capacity changes and enhanced capabilities including the ability to self provision or self diagnose problems that would reduce labor costs.

UNE Final Order, at 301.

Sprint believes that BellSouth's Motion is the best evidence in support of the position that the Commission made the correct decision in this area, wherein BellSouth states:

> What is most important to recognize is that the BSTLM sizes, builds and costs a network to serve a given demand (in this case 1999 demand), and then divides that total network cost by the same demand used to size the network in order to develop the per unit cost.

Motion, at 6-7. Sprint views this as clearly conceding the reality that the network investment calculated in BellSouth's model is based on 1999 customer demand with no adjustment for access line

growth for the years 2000-2002. What BellSouth continues to confuse, says Sprint, is that its TPI equipment material price increases could somehow account for the increased access line growth reflected in the expense numerator of its unit cost calculation.

STAFF'S ANALYSIS

Staff believes that BellSouth has identified a mistake of fact or law in the Commission's decision on this point. Based on further scrutiny of the existing record, staff has determined that what previously appeared to be a mismatch is not. Staff erred in its analysis of the testimony and as such, its statements to the Commission at Agenda and in our recommendation that a mismatch exists were incorrect. In fact, the record reflects that the total demand for loops that was used to size the overall network is identical to the demand which is used as the denominator to yield the loop unit cost; thus, there is no mismatch. As such, staff recommends that the Commission reconsider its decision to reject BellSouth's proposed inflation factor, because it was based upon a misinterpretation and misrepresentation of the facts presented. Staff believes that it is important for the Commission to reconsider its decision regarding the inflation factor at this time rather than as a part of the 120-day filing due to the significant impact that the inflation factor has on costs.

B. Hybrid Copper/Fiber Loops

BellSouth also argues that the Commission should, at a minimum, clarify its requirement that: "Furthermore, because we believe that BellSouth is obligated, if technically feasible, to provide hybrid copper/fiber xDSL-capable loops to Data ALECs, BellSouth shall be required to submit a cost study for hybrid copper/fiber xDSL-capable loops within 120 days from the issuance of this Order for further consideration by this Commission." Order at p. 65. BellSouth contends that the phrase "hybrid copper/fiber xDSL-capable loops" is vague; therefore, it is uncertain what it must do in order to comply with the Commission's directive. BellSouth adds that if the Commission is requiring it to enable the provision of xDSL services over fiber/DLC loops, under the company's current architecture, it is technically unable to do so.

BellSouth emphasizes that, as set forth in the Commission's Order, it appears that ALEC witness Riolo agreed that BellSouth is

currently unable to provision xDSL over fiber/DLC loops, as indicated by the witness's acknowledgment that BellSouth is currently testing DLC systems. BellSouth adds that even witness Dickerson noted that these "technological developments are underway. . . ." See Order at p. 69. Therefore, BellSouth argues that it should not be required to provide cost studies on an "as yet undetermined architecture." Motion at p. 10. BellSouth further argues that even the Commission noted in its Order that there was insufficient evidence in the record about the specific components of these loops, which BellSouth now contends is due to the fact that the architecture for such loops has not yet been deployed. Staff notes that this is extra-record evidence.

In addition, BellSouth argues that the Commission should not impose requirements regarding a DLC system that are incompatible with BellSouth's current network. BellSouth contends that security risks would result, particularly regarding the collocation at a remote terminal issue. BellSouth explains, however, that there are still ways that ALECs can have access to the high frequency portions of the loop without imposing burdensome requirements on the ILEC, such as by collocating a DSLAM at a remote terminal to provide ADSL service.

BellSouth further contends that the Order could be read to require BellSouth to provide unbundled packet switching. The company argues that this would be additional sub-loop unbundling beyond that which is required by the FCC. BellSouth argues that it currently provides unbundled loops consistent with the FCC's Third Report and Order, and that while FCC Rule 51.317 allows state commissions to require additional unbundling under certain circumstances, those circumstances have not been met here. Specifically, BellSouth contends that there is no evidence that the additional sub-loop elements are "necessary" or that ALECs will not be able to compete without them. BellSouth emphasizes that the FCC in its Third Report and Order extensively analyzed packet switching and other equipment used to provide advanced services, and determined that such equipment was generally unnecessary and need not be unbundled, except when the ILEC refused collocation at the remote terminal. BellSouth adds that the FCC further determined that competing carriers would not be impaired if these sub-loop elements were not unbundled.

Finally, BellSouth contends that in prior arbitrations, the Commission has declined to impose such unbundling, except as

provided for under FCC Rule 51.319. For these reasons, BellSouth argues that the Commission should reconsider its decision.

The ALECs contend that BellSouth has failed to identify a mistake of fact or law in the Commission's decision. They contend that BellSouth is simply trying to maintain its "stranglehold" on the market for high speed DSL services. As for BellSouth's arguments: 1) that forward-looking DLC units that support xDSL services do not yet exist; and 2) that its reliance on fiber in its network and its ability to severely limit competition for xDSL customers served through fiber-fed loops does not support the ALECs claims that a hybrid fiber/copper loop, is necessary for competition, the ALECs contend that these have already been addressed, and rejected, by the Commission. In fact, the ALECs contend that the evidence in the record shows that BellSouth is in the process of deploying Next Generation Digital Loop Carrier units. The ALECs emphasize that BellSouth's witness Milner stated that the expected deployment would be mid-2001.

In addition, the ALECs contend that other ILECs are deploying next generation technology, and other state commissions have recognized that the ILECs must offer competitors access to fiber-fed DSL loops at unbundled network element rates. As such, the ALECs contend that the Florida Commission correctly concluded that it should investigate the impact of BellSouth's ability to provide DSL over fiber-fed DLC units and should set rates, terms and conditions for such.

The ALECs further contend that the evidence demonstrates that fiber-fed loops are necessary for competition and that competition will, in fact, be impaired without it. The ALECs emphasize that the FCC has already made clear that BellSouth must provide line sharing over an entire loop even when the loop is fiber--without requiring the ALEC to place a DSLAM or splitter in the remote terminal. Thus, the ALECs believe the FCC has recognized that the ALECS need flexibility in their ability to provision DSL services.

The ALECs maintain that the evidence also is clear that BellSouth has deployed almost a 40% fiber network. Without access to DLC units, competitors will not be able to provide xDSL services over this fiber in an efficient, cost-effective manner. They also contend that in a forward-looking network, BellSouth will achieve DSLAM functionality at the remote terminal through line cards placed in the DLC. The ALECs believe that a collocation option

that allows competitors to have BellSouth place line cards on their behalf, as well as allowing competitors to place their own, is necessary to comply with the UNE Remand Order, which states that "a requesting carrier [should be allowed] to collocate its DSLAM in the incumbent's remote terminal, on the same terms and conditions that apply to its own DSLAM." See FCC Third Report and Order, FCC 96-98, released November 5, 1999. The ALECs contend that this option is not only critical to ensure that Florida consumers receive the benefits of a competitive market, it is also consistent with the FCC's decision. Thus, they contend that the Commission should reject BellSouth's Motion on this point.

STAFF'S ANALYSIS

On this point, staff believes that BellSouth has failed to identify a mistake of fact or law in the Commission's decision. In addition, BellSouth's assertions that it is currently unable to provide this technology, but that it offers other reasonable alternatives, appear to constitute extra-record evidence that is inappropriate for consideration within the context of a Motion for Reconsideration. The ALECs' responsive assertions that other ILECs are currently deploying next generation technology and that other states have recognized that ILECs must offer ALECs fiber-fed DSL loops at UNE rates also appears to be extra-record information that should similarly be disregarded in the rendering a decision on BellSouth's motion.

Furthermore, the Commission clearly stated that there was insufficient record evidence regarding the specific components of such loops. Therefore, the Commission only set rates for all-copper xDSL-capable loops and required BellSouth to file a cost study for hybrid copper/fiber xDSL-capable loops within 120 days of the issuance of its Order. Specifically, the Commission found that

> Upon consideration, we find that the ALECs, rather than BellSouth, should determine and take the responsibility for the DSL service being provisioned. However, we also emphasize that there was some testimony in this record regarding DSL service being provisioned over a hybrid copper/fiber loop. The Data ALECs apparently view this technology as one worthy of an UNE status. Nevertheless, there is insufficient record evidence in this proceeding to set rates for a hybrid copper/fiber xDSL-capable loop. In particular, there is insufficient evidence regarding

the specific components of these loops, such as line cards, vendors, and their associated prices. Therefore, the only rates for xDSL-capable loops that can be set in this proceeding are for all-copper xDSL-capable loops. As such, our approved recurring and nonrecurring rates for all-copper xDSL loops, reflecting the various adjustments approved herein, are set forth in Appendix A to this Order.

Furthermore, because we believe that BellSouth is obligated, if technically feasible, to provide hybrid copper/fiber xDSL-capable loops to Data ALECs, BellSouth shall be required to submit a cost study for hybrid copper/fiber xDSL-capable loops within 120 days from the issuance of this Order for further consideration by this Commission.

Order No. PSC-01-1181-FOF-TP at p. 75.

While BellSouth appears to believe that the Commission has already reached a conclusion that BellSouth must provision xDSL service over hybrid loops, the Commission clearly stated in its Order that this obligation applies "if technically feasible." The Commission has drawn no conclusions as to the feasibility of this proposal. In fact, the Commission recognized that there was insufficient record evidence regarding even the components of such a loop. The Commission did, however, find that there was enough evidence in the record to warrant further investigation of hybrid loops. BellSouth has not identified any mistake of fact or law in the Commission's decision on this point, and essentially appears to ask the Commission to reach a conclusion in an area where the Commission has already stated that there is insufficient evidence to do so. This does not meet the standard for a Motion for Reconsideration, and should, therefore, be denied.

However, staff does agree with BellSouth that the reference to "hybrid copper/fiber xDSL-capable loops" could be considered somewhat ambiguous. It is within the Commission's discretion to clarify its Orders when necessary. Therefore, staff recommends that the Commission clarify its Order to reflect that hybrid copper/fiber xDSL-capable loops are those deployed over fiber/DLC loops.

C.   xDSL-CAPABLE LOOPS

BellSouth also argues that the Commission should reconsider its decision to require BellSouth to provision SL-1 loops and guarantee not to roll them to another facility or convert them to another technology. See Order at p. 67. BellSouth contends that the Commission overlooked the fact that the ability to use the SL-1 loop to provide voice service using a variety of technologies is what keeps the price of an SL-1 lower, as compared to an xDSL-compatible loop. BellSouth notes that while the Commission acknowledged the differences between SL-1 loops and xDSL-compatible loops, the decision to require a guarantee, not to roll it to another technology essentially ignores the differences between these two types of loops. Thus, BellSouth argues that the Commission's decision does not take into account the cost of this new requirement for a "guaranteed copper" SL-1 loop.

BellSouth adds that since the Commission's hearing in this matter, it has started offering ALECs a non-designed xDSL-compatible loop, which is a copper loop capable of carrying xDSL service but without the design features ALECs do not want. BellSouth believes that this new "no frills" loop should satisfy the Commission's concerns regarding this issue. Otherwise, because the Commission did not consider the costs associated with guaranteeing no rollover for SL-1 loops, BellSouth asks for reconsideration on this point.

In their response, the ALECs contend that BellSouth's motion ignores the evidence in the record of this proceeding and attempts to introduce new evidence into the record. The ALECs emphasize that the parties at hearing agreed that xDSL service may be provisioned over SL-1 loops at the ALECs' discretion. They note that ALEC witness Riolo testified that facilities used to provide xDSL services are "identical or nearly identical to those used to provide voice-grade services." Citing TR at 2669. The ALECs contend that even BellSouth's own witnesses acknowledged this fact.

The ALECs also argue that BellSouth is now trying to claim that there is a "cost" associated with guaranteeing a copper loop will not be rolled to another technology, in spite of the lack of evidence in the record to support this contention. The ALECs contend that the record actually reflects that there is no or nominal cost associated with identifying and guaranteeing these loops.

Furthermore, the ALECs contend that while BellSouth acknowledges that ALECs can provide data services over an SL-1 loop, BellSouth is seeking to require ALECs to use a more expensive loop in order for BellSouth to guarantee that it will remain the type of loop the ALEC ordered. The ALECs assert that this is BellSouth's attempt to avoid providing access to loop makeup information during pre-ordering so that it can charge higher rates to ALECs contrary to the intent of the Act.

The ALECs explain that the reason BellSouth should be providing them with sufficient loop makeup information is so that they can make their own independent judgment about whether the loop they want can support the services they want to provide. In this way, the ALEC takes the risk upon itself voluntarily; however, this risk should not include the risk that the information upon which it based its original decision will change because the makeup of the loop itself is subject to change. The ALECs maintain that if they cannot rely upon the loop makeup information they get from BellSouth, then there is really no purpose in getting the information in the first place. The ALECs note that it is peculiar that BellSouth is able to provide accurate information and a guarantee for the more expensive loops. They emphasize that BellSouth should be required to do this for all loops it provides. The ALECs add that BellSouth's claim in its Motion that it now offers new UNEs that should satisfy the ALECs' concerns is extra-record information that should not be considered by the Commission in rendering its decision on BellSouth's Motion.

STAFF'S ANALYSIS

Staff recommends that BellSouth has failed to identify a mistake of fact or law in the Commission's decision on this point as well. BellSouth provided no evidence regarding costs associated with guaranteeing that a loop will not be converted from one technology to another. As such, BellSouth has not identified any mistake of fact or law in the Commission's decision or anything overlooked by the Commission. Furthermore, BellSouth's contention that it now offers ALECs a non-designed xDSL-compatible loop is extra-record evidence that does not affect whether BellSouth has met the standard for reconsideration.

Nevertheless, staff notes that in addressing the issue of loop makeup information and converting loops to alternative technologies, it does not appear that the Commission intended to

preclude BellSouth from identifying any non-recurring costs associated with tagging an SL-1 loop. Rather, as specifically noted by a Commissioner:

> . . . if you want a cost study from BellSouth after the fact, that's fine. I just don't think that the Commission has to tell BellSouth that they can petition the Commission to show that the cost associated with tagging would be burdensome.

Thus, staff suggests that the Commission clarify that BellSouth is not precluded from submitting support for such non-recurring costs as part of its 120-filing, or at some future date. It appears that the Commission simply declined to specifically request that this information be a part of that filing or any other future filing.

D.   LOOP CONDITIONING

BellSouth also argues that the Commission should reconsider its decision rejecting rates for conditioning loops less than 18,000 feet. See Order at p. 394. BellSouth argues that while it is true that a forward-looking network designed today would not include load coils, the fact that they are on BellSouth's existing network means that BellSouth will incur a very "real and ongoing cost" every time it must meet an ALEC request to condition a loop. Furthermore, BellSouth contends that there was evidence in the record to support cost recovery for conditioning these short loops, as provided by witness Caldwell. BellSouth argues that in rejecting rates for short loops, the Commission erred in its interpretation of the TELRIC methodology.

BellSouth emphasizes that the FCC was clear in its Third Report and Order at Paragraph 193 that the ILEC should be able to charge for conditioning such loops. Thus, BellSouth contends that the FCC has determined that allowing cost recovery for conditioning on short loops is not contrary to TELRIC. As such, BellSouth seeks reconsideration of this point, because it believes it is entitled to cost recovery.

In response, the ALECs argue that the Commission correctly rejected BellSouth's rate proposal for conditioning loops under 18,000 feet because it is inconsistent with a forward-looking network. The ALECs note that BellSouth even concedes that the

Commission's decision is consistent with TELRIC principles. The ALECs argue that BellSouth is asking for recovery of embedded costs, which is exactly what TELRIC prohibits. They note that load coils were features that were installed over 20 years ago, and ". . . their presence in BellSouth's plant today results from BellSouth's failure to bring its outside plant up to modern specifications." Citing (Riolo TR 2730). The ALECs emphasize that the Florida Commission is not alone among the states in rejecting rates for short loops.[1] Furthermore, the ALECs emphasize that the evidence shows that BellSouth does not charge a nonrecurring loop conditioning charge to its retail customers, even though ISDN, T-1, and DS-1 loops can only be provisioned without interference from features such as load coils. Thus, the ALECs contend that it is simply unfair for them to have to pay a nonrecurring charge when they are only seeking the same type of clean, copper loop. For these reasons, they ask the BellSouth's motion on this point be denied.

STAFF'S ANALYSIS

Staff does not believe that BellSouth has identified a mistake of fact or law in the Commission's decision on this point. As recognized in the Commission's Order at p. 459, "Nevertheless, for loops shorter than 18 Kft., loop conditioning does not appear to be consistent with a forward-looking cost methodology." Staff emphasizes that there was extensive discussion regarding this issue at the April 18, 2001, Agenda Conference. As clearly stated in the Order, the Commission made its decision to reject nonrecurring charges for load coil removal on short loops based upon a policy decision that a forward-looking network would not have load coils on short loops. BellSouth has not identified anything the Commission overlooked, and in fact, acknowledges that short loops in a forward-looking network would not have load coils on them. As such, BellSouth's Motion on this point should be denied.

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[1]Citing Massachusetts Dept. of Telecommunications and Energy, Order - In re: Investigation as the propriety of rates and charges set forth in M.D.T.E. No. 17, Order in Docket D.T.E. 98-57-Phase III at 87, Sept. 28, 2000; Utah Public Service Commission Phase III Part C Report and order in Docket No. 94-999-01, June 2, 1999; Oregon Public Utility Commission Order No. 98-444 in Docket Nos. UT-138 and UT-139, entered Nov. 13, 1998.

E.   NID COSTS

BellSouth argues that the Commission erred in its decision at pages 192-193 of its Order addressing NIDs. There, BellSouth believes that an inconsistency exists in the treatment of exempt/miscellaneous material for the stand-alone NID and the exempt/miscellaneous material for the NID provisioned with a loop. BellSouth explains that because the NID coming from the BSTLM (NID with loop) includes exempt material, taxes, labor, etc., the BellSouth Cost Calculator does not need to apply In-Plant Factors to drop and NID investments. BellSouth further explains that this is done by assigning "sub-FRCs" to the drop and NID. These codes instruct the Cost Calculator not to apply In-Plant factors to those items. Thus, the company contends there is no double counting of In-Plant costs. Therefore, BellSouth believes the Commission made a mistake of fact and should reconsider its ruling.

As for the stand-alone NID, BellSouth contends that it is a separate UNE offering designed for when the existing NID is not suitable for the ALEC's purposes. BellSouth explains that it charges a non-recurring charge for the installation of, the material for, and the cross connect to the stand-alone NID, where applicable. BellSouth emphasizes, however, that this is the same kind of NID placed with a loop. BellSouth notes that it did not include exempt material in its stand-alone NID costs, when it now believes it should have. Thus, BellSouth simply notes that it intends to do so in its 120-day filing.

The ALECs did not respond on this point.

STAFF'S ANALYSIS

In its Order at page 226, the Commission stated:

Given these inconsistencies, we find that an adjustment must be made; however, it is not clear from this record what the correction should be. Therefore, we find that the appropriate assumptions and inputs for drops and NIDs are the material prices identified by BellSouth at this time. However, we order BellSouth to identify and explain all necessary revisions that should be made to NIDs (both in the BSTLM and in its standalone NID study) when BellSouth refiles the BSTLM and the BSCC within 120 days of the date of the order, as addressed in sub-

> section O. If BellSouth believes revisions are
> necessary, BellSouth should, as appropriate, submit
> modified versions of the BSTLM and the BSCC. If
> BellSouth believes that no corrections are warranted,
> BellSouth shall provide a detailed explanation
> reconciling the apparent inconsistencies discussed above.

In its Motion, BellSouth is apparently asking the Commission to do what it has already stated that it will review as part of BellSouth's 120-day filing. As such, BellSouth's arguments are premature. Furthermore, BellSouth's Motion does not identify any mistake of fact or law in the Commission's decision. Therefore, the Motion on this point should be rejected.

F.   SAC TIME DISCREPANCIES

BellSouth contends that the Commission also erred in its decision on the Service Advocacy Center (SAC) process. BellSouth explains that at page 305 of the Commission's Order, the Commission determined that BellSouth's cost studies (FL-xDSL.xls) with loop make-up are incorrect, because BellSouth did not apply the 10% probability shown in Column I. BellSouth argues, however, that its cost studies are correct. It claims that if the work functions of the SAC included in the loop with loop make-up are compared with the stand-alone loop make-up cost study, it is evident that the exact same work times are used. BellSouth contends that the SAC process in the case of a loop with loop make-up is a manual process that occurs each time a loop make-up is requested; thus, it is not a function of "fall-out" and the 10% probability does not apply.

BellSouth further explains that the cost study for loop without a loop make-up implies the loop make-up has been secured either in a mechanized or manual stand-alone process or is not needed by the ALEC. In either case, BellSouth explains that it is possible that the engineering function would flow-through (90% of the time) or in 10% of the situations would fall-out and require manual handling. BellSouth argues that in such cases it is appropriate to reflect these probabilities, because in a fall-out situation, BellSouth would have to go through the same process necessary to complete a loop make-up. As such, BellSouth asks that the Commission reconsider its decision on this point.

No responses to this point on reconsideration were filed.

STAFF'S ANALYSIS

As explained on page 354 of the Order, the Commission found unexplained SAC time discrepancies that appeared to be based on BellSouth's failure to apply the 10 percent probability that BellSouth had identified on page 14 of the spreadsheet F1-xdsl.xls (Hearing Exhibit 95) as applicable to SAC work times. The error appeared to inflate work times for provisioning of ADSL by as much as 20 percent. Although BellSouth now contends that the 10 percent probability is not applicable because the SAC process in the case of a loop with loop make-up is a manual process that occurs each time a loop make-up is requested, there was no similar explanation in the spreadsheets that such was the case. Thus, this appears to be extra-record evidence that is not appropriate for consideration in addressing a Motion for Reconsideration. Furthermore, there was no explanation in the testimony regarding this discrepancy. There was testimony from BellSouth's witness Greer regarding SAC activities. However, witness Greer did state that, "Because the work funtions performed by SAC are highly mechanized for the most part, it is assumed that the manual efforts by the SAC will occur only 10% of the time." The witness did not explain that it did not apply to loops with loop makeup (LMU). See Order at p. 375. Furthermore, the Commission noted that

> SAC times were included in Service Inquiry in the original study but were moved to Engineering in the revised study. This means that ADSL loops ordered both with and without loop makeup include SAC time under the new study. If SAC time were still included in Service Inquiry, as it was in the original study, then in the revised study, SAC time would have been included only for loops with loop makeup.

Order at p. 400. There was no evidence to the contrary.

Based on the foregoing, staff recommends that BellSouth has failed to identify a mistake of fact or law in the Commission's decision. Instead, the company has identified only an apparent failure on its own part to fully explain in the record the applicability of the 10 percent probability. The evidence at hearing strongly suggested that an error did in fact occur within BellSouth's cost study and it is upon this that the Commission based its decision. BellSouth is now simply trying to introduce new evidence into the record via its Motion for Reconsideration.

This is improper; therefore, BellSouth's Motion on this point should be denied.

ISSUE 2:   Should the Commission grant MCI, AT&T, Covad, and Z-Tel's Joint Motion for Reconsideration?

RECOMMENDATION: The Motion for Reconsideration should be denied as set forth in the Staff Analysis.   **(KEATING, DOWDS, LEE)**

STAFF ANALYSIS: As set forth in the prior Issue, the standard of review for a motion for reconsideration is whether the motion identifies a point of fact or law which was overlooked or which the Commission failed to consider in rendering its Order. See Stewart Bonded Warehouse, Inc. v. Bevis, 294 So. 2d 315 (Fla. 1974); Diamond Cab Co. v. King, 146 So. 2d 889' (Fla. 1962); and Pingree v. Quaintance, 394 So. 2d 161 (Fla. 1st DCA 1981). In a motion for reconsideration, it is not appropriate to reargue matters that have already been considered. Sherwood v. State, 111 So. 2d 96 (Fla. 3rd DCA 1959); citing State ex. rel. Jaytex Realty Co. v. Green, 105 So. 2d 817 (Fla. 1st DCA 1958). Furthermore, a motion for reconsideration should not be granted "based upon an arbitrary feeling that a mistake may have been made, but should be based upon specific factual matters set forth in the record and susceptible to review." Stewart Bonded Warehouse, Inc. v. Bevis, 294 So. 2d 315, 317 (Fla. 1974).

A.   Use of Three Models

In their Motion, the Movants contend that the use of three scenarios by BellSouth violates FCC TELRIC rules. They note that BellSouth used the BST 2000 Scenario to determine the cost of stand-alone loops, the Combo Scenario to determine the costs of voice grade loops combined with a switch port, and the Copper Only Scenario to derive the cost of copper-based xDSL loops. The Movants emphasize that the Commission recognized at page 154 of its Order, that a single unified network design is the best way to set rates. However, they contend that the Commission then incorrectly determined that such a single unified network design "is not attainable based on this record." Citing Order at p. 154. In doing

so, the Movants argue that the Commission failed to consider that FCC Rule 51.505(b) requires the use of a single network design. Therefore, they argue that the Commission should reconsider its decision and set all rates based upon the Combo Scenario. They note that while this scenario is not perfect, "it is the most appropriate single scenario that BellSouth offered." Motion at p. 2.

The Movants cite FCC Rule 51.505(b) as follows:

(b) <u>Total element long-run incremental cost.</u> The total element long-run incremental cost of an element is the forward-looking cost over the long run of the total quantity of the facilities and functions that are directly attributable to, or reasonably identifiable as incremental to, such element, **calculated taking as a given the incumbent LEC's provision of other elements.**

> (1) <u>Efficient network configuration.</u> The total element long-run incremental cost of an element should be measured based on the use of the most efficient telecommunications technology currently available and **the lowest cost network configuration,** given the existing location of the incumbent LEC's wire centers. (Emphasis Added by Movants)

The Movants contend that this rule requires rates to be set based on the "lowest cost network configuration," instead of on several different configurations. They further argue that the network must take into account the provision by the ILEC of other elements, which is necessary in order to capture economies of scale.

The Movants explain that BellSouth's use of three scenarios violates the FCC Rule in two ways. First, they contend that BellSouth's use of different engineering assumptions violates FCC Rule 51.505(b), because BellSouth did not use the lowest cost assumption across the board. They contend that the lowest cost network configuration for serving demand that includes stand-alone

loops, loop/port combinations, and xDSL loops would be a network that includes a mix of IDLC, UDLC and all copper loops.

The Movants contend that BellSouth's use of three scenarios also violates the FCC Rule because doing so does not take into account the ILEC's provision of other elements, and thus, does not take into account economies of scale and scope. In order to properly account for this, the ALECs argue that BellSouth must use a single network that takes into account demand for loop/port combinations, stand-alone loops, and xDSL. The forecast should include demand for UNE loops and BellSouth's own retail demands. The mix of IDLC, UDLC, and copper loops in the single network would better include the efficiencies of scale and scope that the FCC Rule contemplated, according to the ALECs.

The Movants contend that BellSouth's use of three separate networks assumes that under one scenario, every customer will need a copper loop, in the second scenario, every customer will need an IDLC loop, and in the third scenario, every customer will need a UDLC loop. The Movants assert that these assumptions are flawed, because in a real network, certain customers will require one type of loop, while other will require another type. They contend that economies of scale and scope can only be properly accounted for by projecting demand for each type of facility in a single network.

Finally, the Movants argue that the Commission should reconsider its decision to allow BellSouth's three-scenario approach in view of the parties' Stipulation approved by Order No. PSC-99-2467-PCO-TP, in which the parties agreed that BellSouth's cost study would comport with FCC Rules 51.501 and 51.511. They add that unless BellSouth files a proper cost study based upon a unified network that meets the demand for all UNEs and services on an integrated basis, the Commission should set UNE rates based on the most appropriate of the three designs BellSouth did submit, which they argue is the Combo Scenario.

In response, BellSouth contends that the Movants have failed to identify a mistake of fact or law in the Commission's decision, and therefore, the Motion should be rejected on all points.

Specifically, BellSouth contends that the ALECs argued at hearing that the BSTLM should be constructed on a single network, as noted in the Commission's Order at page 121. BellSouth maintains that they are simply rearguing points already raised and

considered by the Commission, and as such, the Motion should be denied.

Furthermore, BellSouth asserts that the ALECs, except for Covad, failed to even raise FCC Rule 51.505(b) in their briefs or testimony. BellSouth argues that it is inappropriate to raise new arguments on reconsideration.[2] Thus, BellSouth argues that the Movants' Motion on this point should be rejected for this reason as well.

BellSouth adds that even if the ALECs had properly raised the implications of FCC Rule 51.505(b) at hearing, the Commission still properly considered all FCC rules in setting UNE rates. BellSouth notes that, in fact, the Commission stated in its Order, as the Movants even acknowledge, that the Commission ". . . is bound by the FCC rules as they currently stand. . . ." See Order at pp. 26 and 34. BellSouth emphasizes that FCC Rule 51.505(b) is actually cited in the Commission's Order at least 3 times; thus, BellSouth contends that the Commission must have considered it in reaching its decision.

Finally, BellSouth emphasizes that its modeling principle complies with FCC Rule 51.505(b). BellSouth argues that it considered the total quantity of facilities in each scenario--each scenario had the same line count. Thus, it maintains that the three scenarios met the FCC's criterion that "a reasonable projection of the sum of the total number of units" be considered. Furthermore, it contends that its approach is proper because it cannot project the ultimate use of any particular loop--a voice grade service today could be used for digital service tomorrow. Also, since BellSouth does not have the ALEC's marketing plans, it argues that it could not anticipate where ALEC customers will be or what they will buy.

As it stands, BellSouth argues that its three scenario approach does properly reflect economies of scale and scope. BellSouth maintains that the ALECs have not identified any mistake in the Commission's decision; thus, BellSouth asks that the Motion be denied on this point.

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[2]Citing Order No. PSC-96-1024-FOF-TP, issued August 7, 1996, in Docket No. 950984-TP; and Order No. PSC-96-0347-FOF-WS, issued March 11, 1996, in Docket No. 950495-WS.

STAFF'S ANALYSIS

Staff does not believe that the Movants have identified a mistake of fact or law in the Commission's decision on this point. Staff notes that while the Commission referred to Rule 51.505(b) in its Order in explaining the background of this case and the current state of the law, there appear to be minimal (if any) references to this rule in the transcript. Nevertheless, the Commission did address all of these same arguments at pages 140, 145, 154, and 155 of its Order. Therein, the Commission determined that

> In its cost study filing BellSouth submitted three distinct BSTLM scenarios: Copper Only, used to derive the costs of copper-based xDSL-capable loops; Combos, used to determine the costs of 2-wire analog VG UNE loops and 2-wire ISDN UNE loops provisioned with a port; and BST2000, used to arrive at costs for all other loop types (other than those above DS1). In contrast, all other parties appear to agree that a single scenario, the Combos scenario, should be used for all loop types. In principle, it appears to us that a single unified network design is most appropriate. However, we believe this goal is not attainable based on this record.

Order at p. 154.

The Commission also noted that, "The only fundamental difference between the Copper Only run and the other scenarios is that the fiber/copper breakpoint was set at 1,000,000 feet, in order for the model always to deploy copper feeder and distribution cable." Order at p. 154. The Commission also considered and concluded that:

> We agree with BellSouth that the record does not support that stand-alone DS0 level UNE loops can be handed off to an ALEC where integrated digital loop carrier (IDLC) is deployed. We note that BellSouth witness Milner testifies that it is not technically feasible to provide a stand-alone unbundled loop at less than a DS1 level; he states that even where the ILDC is GR-303 compliant, though it appears that a DS0 could be delivered, it would require an entire DS1 facility for transport. Accordingly, at this time we find that the record supports that the BST2000 is an appropriate basis for

determining the costs of stand-alone UNE loop offerings,
while the Combos run is appropriate only for certain
integrated loop/port combinations.

Order at p. 155.

Furthermore, it is not clear that the use of three scenarios
necessarily conflicts with Rule 51.505(b)(1). Staff does not
believe that the rule requires unified scenarios, as long as the
cost modeling is based upon the lowest cost configuration and takes
into account the provision of other elements. Furthermore, as
argued by BellSouth witness Caldwell, it appears that the use of a
single, unified scenario ". . . would lead to under-recovery for
BellSouth because not all uses of a loop are reflected in a single
scenario." Order at p. 146. It does not appear the Rule 51.505(b)
contemplates requiring the incumbent LEC to under-recover its
costs. There was also testimony from BellSouth's witness Milner
that "it is not technically feasible for BellSouth to provide a
stand-alone unbundled loop using IDLC at less than a DS1 level;
thus, it is necessary to model universal digital loop carrier
(UDLC) to determine the cost of a single unbundled DS0 loop."
Order at p. 147. It does not appear that Rule 51.505(b) requires
modeling based upon a network configuration that is not technically
feasible.

For all these reasons, staff recommends that the Movants'
Motion for Reconsideration on this point be denied. The Movants
have not identified a mistake of fact or law in the Commission's
decision. Disagreement with the Commission's interpretation of the
law does not equate to mistake in its decision.

B.   Clarification of Costing Relationship for UNEs and USF

The Movants assert that while the Commission accepted in this
proceeding that a "bottoms-up" approach to developing installed
costs is most appropriate, the Commission rejected the proposal by
WorldCom and AT&T to use the inputs from the USF docket. They note
that the Commission, instead, set UNE rates on "flawed" loading
factors and then directed BellSouth to refile cost studies in 120
days that explicitly model all cable engineering and installation
placements and associated structures. See Order at p. 306.

While the Movants do not seek reconsideration of this point,
they do seek clarification of the Commission's rejection of the USF

inputs, because it could be interpreted that the Commission believes different cost methodologies are appropriate for USF and UNE costing purposes. As such, the Movants ask that the Commission clarify its Order by adding the following statement:

> While we reject the use in this docket of inputs from our Universal Service Proceeding (Docket No. 980686-TP), we do not intend to imply that it is appropriate to use different network designs or underlying cost information for UNE costing and USF purposes. To the extent that company-specific data and network design information is developed for UNE costing purposes, such data would be appropriate for use in future USF proceedings.

In response, BellSouth argues that clarification is not proper unless the Commission's intent is not readily apparent from its Order.[3] Further, BellSouth contends that the requested clarification would improperly set Commission precedence for future USF proceedings. BellSouth argues that this is beyond the scope of the issue addressed at hearing. The company further states that if the Commission established future USF rates, "it can, in that proceeding, determine if 'company-specific data and network design information' developed in the UNE costing purposes can be used." Response at p. 6. BellSouth argues that to make the requested clarification now would simply be premature.

STAFF'S ANALYSIS

Staff agrees with BellSouth that this requested clarification is beyond the scope of the issues addressed in this proceeding, is premature, and is unnecessary. The Commission's Order (and the proceeding as a whole) was clear that this proceeding was designed to address rates for UNEs for BellSouth, not to establish a costing methodology of more general applicability. Furthermore, the Movants have not identified a mistake of fact or law in the Commission's decision, only a vague concern that the decision could someday affect future USF proceedings. Therefore, staff recommends that the requested clarification be rejected.

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[3]Citing Order No. PSC-01-1015-FOF-TP, issued April 24, 2001, in Docket No. 991854-TP.

C.   Shared Cost Allocation

The Movants also ask that the Commission reconsider its determination to adopt BellSouth's "per-DSO" allocation methodology, and its conclusion that there may be an "indirect causal relationship" between DSOs and fiber cable. In reaching this conclusion, the Movants argue that the Commission overlooked the fact that, by definition, items which are truly shared costs have no causal linkage to any single service. They further contend that the Commission did not consider that both the FCC's Orders and the Florida Statutes require pro-competitive allocations where feasible.

They further explain that the BSTLM requires the allocation of shared investments to individual services. They contend that since shared investments do not vary with the amount of any single service, any allocation is inherently arbitrary. They argue that BellSouth advocated allocating shared investments in loop plant based on DS0 equivalents, and under this methodology, a 2-wire facility used to provide T-1 service, which carries 24 channel equivalents, would be allocated 24 times as much shared cost as a 2-wire voice grade loop. On the other hand, WorldCom and AT&T advocated allocating shared investments based on the number of copper pair equivalents used to provide the service. They contend that this avoids the anti-competitive impact of placing high levels of shared costs on high-capacity services "whose demand is fairly elastic." Motion at p. 8.

The Movants contend that the FCC, in its First Report and Order at ¶696, as well as Section 364.01(4), Florida Statutes, require the Commission to allocate costs in a manner that is conducive to competition. Therefore, the Movants ask the Commission to reconsider its decision and to allocate shared costs on a per-pair basis, resetting all affected rates based on this corrected methodology.

BellSouth argues, however, that the Movants' argument is a new argument raised for the first time in their Motion for Reconsideration. As such, BellSouth maintains that the Motion should be denied.

In addition, BellSouth contends that even if the Movants had properly raised this argument earlier in the proceeding, the Commission properly considered all FCC rules in developing UNE

rates in this proceeding. In fact, argues BellSouth, the Commission specifically weighed ". . . the potential competitive effect and based on the evidence in the record, found that 'allocating shared investments based on DSO equivalents is reasonable.'" *Citing* Order at p. 134. Therefore, BellSouth argues that the Movants have not identified a point of fact or law overlooked by the Commission in rendering its decision.

STAFF'S ANALYSIS

Staff recommends that the Movants have failed to identify a mistake of fact or law in the Commission's decision on this point as well. As noted by BellSouth, the Commission considered the competitive effect of allocating shared investments based on DSO equivalents and found that it was reasonable to do so. These arguments were specifically considered at pages 143, 148, 152, and 156 of the Commission's Order. Therein, the Commission considered the evidence presented, including testimony regarding competitive impact presented by AT&T/WorldCom witnesses Donovan and Pitkin. The Commission concluded that allocation based on DSOs was appropriate based on the record--to the full extent that evidence on this argument was presented. The Movants have not identified anything that the Commission overlooked or failed to consider in rendering its decision on this issue, nor any mistake in that decision. Thus, staff recommends that they have not met the standard for a Motion for Reconsideration on this point.

D. **Drop Routing**

The Movants contend that the Commission also improperly rejected their position that drops should be routed at an angle from lot corners in favor of BellSouth's methodology that uses longer, rectilinear drops. See Order at p. 158. The Commission stated that there was no evidence to determine that a distribution terminal must be placed in the corner of a lot or why it should be, and as such, the Commission agreed with BellSouth's approach. *Id*. In reaching this conclusion, the Movants contend that the Commission failed to consider that BellSouth's approach is not the lowest cost network configuration and that an angular drop reduces the drop distance. They argue that the Commission failed to consider the efficiencies of their approach, which is required by Rule 51.505(b). Therefore, they ask that the Commission reconsider its decision and direct BellSouth to modify the BSTLM to require drop routing to be modeled from the corner of lots. They add that

all affected rates should be reset based on this corrected drop
length assumption.

In response, BellSouth argues that this is also a new argument
raised by the Movants for the first time in their Motion for
Reconsideration. BellSouth contends that the Movants did not even
mention FCC Rule 51.505(b) prior to the filing of their Motion.

In addition, BellSouth maintains that even if this argument
had been properly raised, it does not necessitate a different
conclusion, because the Commission properly considered all relevant
FCC rules in rendering its decision on UNE rates. *Citing* Order at
pgs. 26, 34). Furthermore, BellSouth contends that there is no
evidence in the record that terminals placed in lot corners would
be more efficient than that which was approved by the Commission.
As such, BellSouth asks that the Movant's Motion for
Reconsideration be denied on this point as well.

STAFF'S ANALYSIS

The Commission thoroughly addressed the testimony presented
regarding drop routing at pages 145, 150, 152, and 158 of its
Order. There the Commission considered the Movants' argument that
the terminals should be placed in the lot corners. The Commission
found that BellSouth's approach was reasonable, and that there was
little to support the proposal that terminals must be located in
the corner. Specifically, the Order considered the issue as
follows:

> AT&T/WorldCom witnesses Donovan/Pitkin recommended that
> the BSTLM be modified to allow for drop routing from the
> corner of a lot. BellSouth witness Stegeman testified
> that the model had been revised as requested, and in fact
> the August 16, 2000 filings submitted by BellSouth used
> the angled drop approach. Witness Stegeman noted that the
> amount of decrease in drop costs is not as great as
> asserted by the AT&T/WorldCom witnesses because the BSTLM
> does not place all distribution terminals at the corner
> of a lot. Witnesses Donovan/Pitkin assert that BellSouth
> incorrectly modified the BSTLM, because they believe that
> it should be assumed that drops are always placed at the
> lot corner.

> Other than the claim by the AT&T/WorldCom witnesses,
> there is no evidence to determine why a distribution
> terminal must be placed in the corner of a lot. Witnesses
> Donovan/Pitkin testify that BellSouth's implementation of
> angled drop routing results in a reduction of 15% in the
> average drop length. Absent any clear understanding of
> why a distribution terminal should be in a lot corner, we
> find that BellSouth's approach, which employs angled
> routing but implicitly assumes that some terminals are
> not in lot corners, is reasonable.

Order at p. 158.

The Commission fully considered the efficiencies of the Movants'
argument that terminals should be located in the corner of lots--to
the extent that evidence on this argument was presented.   The
Movants have not identified anything that the Commission overlooked
or failed to consider in rendering its decision on this issue, nor
any mistake in that decision.   As such, staff recommends that the
Commission reject the Movants' Motion on this point.

ISSUE 3:   Should the Commission grant BellSouth's Motion To Conform
        Staff Analysis and Cost Model Run to Order No. PSC-01-
        1181-FOF-TP?

RECOMMENDATION: No.   The Motion is actually an untimely Motion for
Reconsideration. However, staff does recommend that the Commission
should, on its own motion, conform the cost model runs to its
decisions set forth in the Order. **(KEATING, MARSH, DOWDS, LEE)**

STAFF ANALYSIS: In its Motion to Conform, BellSouth asks that the
Commission direct the staff to conform its analysis and cost model
runs to the provisions of Order No. PSC-01-1181-FOF-TP.   In
reviewing the post-Order analysis and run, BellSouth contends that
it has found deviations and inconsistencies from the decisions in
the Commission's Order.   BellSouth adds that it does not believe
that these deviations are intentional, rather in implementing the
changes to staff's recommendation that were ordered by the

Commission, BellSouth believes that certain errors appear to have been made.

Specifically, BellSouth contends that the Commission only ordered an adjustment to the shared and common cost factors to reflect the removal of the impact of inflation. In the Staff Memorandum outlining the changes it made to reflect the Commission's decision, BellSouth believes there are changes made to shared and common costs that conflict with the Commission's decision because, as stated in the Staff Memorandum, "the changes made . . . flowed into the shared and common cost calculator, the values were overridden to reflect those ,initially filed by BellSouth." BellSouth explains that its Shared and Common Costs Model was designed to "flow-through" the cost of capital and depreciation inputs, but the Commission's decision specifically stated that the only adjustment would be to eliminate inflation. Thus, BellSouth believes that staff's analysis overlooks the Commission's decision on cost of capital and depreciation when developing the shared and common cost factors. As such, BellSouth contends that the staff's analysis and run should be conformed to the Commission's order.

BellSouth also believes that the staff failed to eliminate the inflation factor from the shared and common factors by simply setting the factors to those filed by BellSouth. BellSouth explains that its factors took into account inflation; thus, to be consistent with the Commission's decision, the CC/BC ratios should be eliminated. BellSouth notes that staff did this for the Plant Specific factors by setting the CC/BC ratios to 1. BellSouth believes that the ratios should be set to 1 for the Shared and Common Cost factors as well.

In addition, BellSouth believes that the staff's cost model run has changed the economic life for Analog Switching from 1.6 years to 7.5 years. BellSouth contends that this was not a change mandated by the Commission; thus, the economic life proposed by BellSouth should be included in the run.

Finally, BellSouth contends that there is an apparent error pertaining to Submarine Fiber Cable. While the Commission expressly adopted BellSouth's proposed lives for the fiber cable accounts (See Order at p. 145), the chart on page 146 of the Order indicates that the approved life is 20 years, instead of the 15 proposed by BellSouth. The incorrect 20 year life was picked up in

the staff's cost model run, the company contends, and should be corrected to conform with the Commission's approval of BellSouth 15 year proposal.

No responses to BellSouth's Motion to Conform were filed.

Staff believes that BellSouth's Motion to Conform is essentially an untimely Motion for Reconsideration, and as such, it should be denied. Nevertheless, staff does believe that the Motion has identified two errors in staff's Post-Order cost model runs that should be corrected. Staff, therefore, recommends that the Commission, on its own Motion, recognize these errors and direct staff to re-run the cost model incorporating each of these changes/errors identified by BellSouth.

Specifically, staff believes the shared and common cost factors should be recalculated to reflect other decisions made by the Commission, as requested by BellSouth. Staff had initially entered a fixed factor into the model in the belief that such a rate reflected the Commission's decision on the shared and common cost factors. However, upon reflection, it is clear that the calculations performed by staff did not accurately reflect the Commission's decision.

Second, the difference in the Analog Switching life noted by BellSouth was the result of a scrivener's error in staff's recommendation. That error was incorporated into the model runs and should be corrected.

Staff disagrees, however, with BellSouth on its final point. While BellSouth is correct that it proposed a 15-year life for Submarine Fiber Cable, and that the staff recommendation contained an error in the depiction of BellSouth's position, the results of the model correctly reflect the 20-year life approved by the Commission; thus, there is no error to correct.

ISSUE 4: Should this Docket be closed?

RECOMMENDATION: No. This Docket should remain open to address BellSouth's 120-day filings and Phase III for Verizon and Sprint. **(KEATING, KNIGHT)**

STAFF ANALYSIS: If the Commission approves staff's recommendations in Issues 1-3, this Docket should remain open to address BellSouth's 120-day filings and Phase III for Verizon and Sprint.

APPENDIX A

The column titled "Nonrecurring Including First" contains the nonrecurring charge for the first unit purchased where a rate is also shown in the column titled "Nonrecurring Additional." If no rate is shown in the "Nonrecurring Additional" column, the rate for all units is that shown under "Nonrecurring Including First," regardless of quantity.

Where a cell is blank, no rate has been set. Where a rate of $0 is shown, that is the rate.

Source of Rates

The rates are a fallout from commission inputs into BellSouth's proprietary cost model.

APPENDIX A

ELEMENT NUMBER & DESCRIPTION		COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.0	UNBUNDLED LOCAL LOOP						
A.1	2-WIRE ANALOG VOICE GRADE LOOP						
A.1.1	2-Wire Analog Voice Grade Loop - Service Level 1						
	Zone 1	$11.74	$44.68	$20.57	$12 79	$49.57	$22.83
	Zone 2	$16.26	$44.68	$20.57	$17.27	$49.57	$22.83
	Zone 3	$30.75	$44.68	$20.57	$33.36	$49.57	$22.83
	Zone 4						
	Zone 5						
	Zone 6						
A.1.1	2-Wire Analog Voice Grade Loop - Service Level 1 - Disconnect Only		$23.10	$5.92		$25.62	$6.57
A.1.2	2-Wire Analog Voice Grade Loop - Service Level 2						
	Zone 1	$13.43	$122.38	$74.35	$14.50	$135.75	$82.47
	Zone 2	$18.60	$122.38	$74.35	$19.57	$135.75	$82.47
	Zone 3	$35.18	$122.38	$74.35	$37.82	$135.75	$82.47
	Zone 4						
	Zone 5						
	Zone 6						
A.1.2	2-Wire Analog Voice Grade Loop - Service Level 2 - Disconnect Only		$57.28	$10.83		$63.53	$12.01
A.2	SUB-LOOP						
A.2.1	Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop						
	Zone 1	$7.60	$83.62	$46.20	$8.05	$92.75	$51.24
	Zone 2	$10.53	$83.62	$46.20	$10.87	$92.75	$51 24
	Zone 3	$19.92	$83.62	$46.20	$21.00	$92.75	$51.24
	Zone 4						
	Zone 5						
	Zone 6						
A.2.1	Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop - Disconnect Only		$45.57	$10.19		$58.45	$13.07
A.2.2	Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop						
	Zone 1	$6.90	$54.26	$19.64	$7.61	$60.19	$21.78

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		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
	Zone 2	$9.56	$54.26	$19.64	$10.27	$60.19	$21.78
	Zone 3	$18.08	$54.26	$19.64	$19.85	$60.19	$21.78
	Zone 4						
	Zone 5						
	Zone 6						
A.2.2	Sub-Loop Distribution Per 2-Wire Analog Voice Grade Loop - Disconnect Only		$37.03	$4.10		$47.50	$5.26
A.2.11	Sub-Loop Distribution Per 4-Wire Analog Voice Grade Loop						
	Zone 1	$7.35	$62.05	$27.42	$8.12	$68.83	$30.42
	Zone 2	$10.18	$62.05	$27.42	$10.96	$68.83	$30.42
	Zone 3	$19.25	$62.05	$27.42	$21.18	$68.83	$30.42
	Zone 4						
	Zone 5						
	Zone 6						
A.2.11	Sub-Loop Distribution Per 4-Wire Analog Voice Grade Loop - Disconnect Only		$37.98	$5.05		$49.71	$6.60
A.2.13	Network Interface Device Cross Connect		$7.12	$7.12		$7.63	$7.63
A.2.14	2-Wire Intrabuilding Network Cable (INC)	$3.33	$46.74	$12.11	$3.50	$51.84	$13.44
A.2.14	2-Wire Intrabuilding Network Cable (INC) - Disconnect Only		$37.03	$4.10		$47.50	$5.26
A.2.15	4-Wire Intrabuilding Network Cable (INC)	$6.32	$50.41	$15.78	6.68	$55.91	$17.51
A.2.15	4-Wire Intrabuilding Network Cable (INC) - Disconnect Only		$37.98	$5.05		$49.71	$6.60
A.2.17	Sub-Loop - Per Cross Box Location - CLEC Feeder Facility Set-Up		$467.08			$487.23	
A.2.18	Sub-Loop - Per Cross Box Location - Per 25 Pair Panel Set-Up		$11.27			$6.25	
A.2.19	Sub-Loop - Per Building Equipment Room - CLEC Feeder Facility Set-Up		$152.58			$169.25	
A.2.20	Sub-Loop - Per Building Equipment Room - Per 25 Pair Panel Set-Up		$43.54			$38.65	
A.2.21	Sub-Loop - Per Cross Box Location - CLEC Distribution Facility Set-Up		$467.08			$487.23	
A.2.24	Sub-Loop - Per 4-Wire Analog Voice Grade Loop / Feeder Only						
	Zone 1	$16.05	$96.40	$58.12	$17.26	$106.92	$64.46

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ELEMENT NUMBER & DESCRIPTION		COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
	Zone 2	$22.23	$96.40	$58.12	$23.29	$106.92	$64.46
	Zone 3	$42.06	$96.40	$58.12	$45.00	$106.92	$64.46
	Zone 4						
	Zone 5						
	Zone 6						
A.2.24	Sub-Loop - Per 4-Wire Analog Voice Grade Loop / Feeder Only - Disconnect Only		$48.55	$11.33		$63.54	$14.83
A.2.25	Sub-Loop - Per 2-Wire ISDN Digital Grade Loop / Feeder Only						
	Zone 1	$16.18	$98.91	$60.12	$17.04	$109.71	$66.68
	Zone 2	$22.41	$98.91	$60.12	$23.00	$109.71	$66.68
	Zone 3	$42.39	$98.91	$60.12	$44.43	$109.71	$66.68
	Zone 4						
	Zone 5						
	Zone 6						
A.2.25	Sub-Loop - Per 2-Wire ISDN Digital Grade Loop / Feeder Only - Disconnect Only		$46.95	$9.74		$60.21	12.49
A.2.29	Sub-Loop - Per 4-Wire 56 or 64 Kbps Digital Grade Loop / Feeder Only						
	Zone 1	$17.52	$90.72	$52.43	$18.68	$100.62	$58.16
	Zone 2	$24.28	$90.72	$52.43	$25.21	$100.62	$58.16
	Zone 3	$45.92	$90.72	$52.43	$48.71	$100.62	$58.16
	Zone 4						
	Zone 5						
	Zone 6						
A.2.29	Sub-Loop - Per 4-Wire 56 or 64 Kbps Digital Grade Loop / Feeder Only - Disconnect Only		$48.55	$11.33		$63.54	$14.83
A.2.30	Sub-Loop - Per 2-Wire Copper Loop Short / Feeder Only						
	Zone 1	$6.65	$76.87	$38.08	$7.25	$85.27	$42.24
	Zone 2	$9.22	$76.87	$38.08	$9.79	$85.27	$42.24
	Zone 3	$17.44	$76.87	$38.08	$18.92	$85.27	$42.24
	Zone 4						
	Zone 5						
	Zone 6						

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	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
ELEMENT NUMBER & DESCRIPTION	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.2.30 Sub-Loop - Per 2-Wire Copper Loop Short / Feeder Only - Disconnect Only		$45.64	$8.43		$58.54	$10.82
A.2.32 Sub-Loop - Per 4-Wire Copper Loop Short / Feeder Only						
Zone 1	$12.76	$89.85	$51.57	$14.22	$99.66	$57.20
Zone 2	$17.67	$89.85	$51.57	$19.20	$99.66	$57.20
Zone 3	$33.43	$89.85	$51.57	$37.09	$99.66	$57.20
Zone 4						
Zone 5						
Zone 6						
A.2.32 Sub-Loop - Per 4-Wire Copper Loop Short / Feeder Only - Disconnect Only		$46.59	$9.38		$60.98	$12.28

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.2.40 Sub-Loop - Per 2-Wire Copper Loop Short / Distribution Only						
Zone 1	$5.66	$54.26	$19.64	$6.25	$60.19	$21.78
Zone 2	$7.83	$54.26	$19.64	$8.44	$60.19	$21.78
Zone 3	$14.82	$54.26	$19.64	$16.30	$60.19	$21.78
Zone 4						
Zone 5						
Zone 6						
A.2.40 Sub-Loop - Per 2-Wire Copper Loop Short / Distribution Only - Disconnect Only		$37.03	$4.10		$47.50	$5.26
A.2.42 Sub-Loop - Per 4-Wire Copper Loop Short / Distribution Only						
Zone 1	$4.72	$62.05	$27.42	$5.20	$68.83	$30.42
Zone 2	$6.53	$62.05	$27.42	$7.02	$68.83	$30.42
Zone 3	$12.36	$62.05	$27.42	$13.55	$68.83	$30.42
Zone 4						
Zone 5						
Zone 6						
A.2.42 Sub-Loop - Per 4-Wire Copper Loop Short / Distribution Only - Disconnect Only		$37.98	$5.05		$49.71	$6.60
A.2.44 Network Interface Device (NID) - 2 line		$63.72	$40.94		$68.08	$42.80
A.2.45 Network Interface Device (NID) - 6 line		$105.96	$83.17		$110.48	$85.20
A.3 LOOP CHANNELIZATION AND CO INTERFACE (INSIDE CO)						
A.3.12 Unbundled Loop Concentration - System A (TR008)	$461.86	$324.01		$449.49	$359.42	
A.3.13 Unbundled Loop Concentration - System B (TR008)	$54.91	$135.00		$53.44	$149.76	
A.3.14 Unbundled Loop Concentration - System A (TR303)	$500.74	$324.01		$487.33	$359.42	
A.3.15 Unbundled Loop Concentration - System B (TR303)	$92.53	$135.00		$90.05	$149.76	
A.3.16 Unbundled Loop Concentration - DS1 Line Interface Card	$5.18	$64.65	$46.45	$5.04	$71.70	$51.52
A.3.16 Unbundled Loop Concentration - DS1 Line Interface Card - Disconnect Only		$16.67	$4.35		$18.49	$4.82
A.3.17 Unbundled Loop Concentration - POTS Card	$2.06	$14.96	$14.88	$2.00	$16.59	$16.50
A.3.17 Unbundled Loop Concentration - POTS Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.3.18 Unbundled Loop Concentration - ISDN (Brite Card)	$8.22	$14.96	$14.88	$8.00	$16.59	$16.50

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		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.3.18	Unbundled Loop Concentration - ISDN (Brite Card) - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.3.19	Unbundled Loop Concentration - SPOTS Card	$12.22	$14.96	$14.88	$11.90	$16.59	$16.50
A.3.19	Unbundled Loop Concentration - SPOTS Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.3.20	Unbundled Loop Concentration - Specials Card	$7.29	$14.96	$14.88	$7.10	$16.59	$16.50
A.3.20	Unbundled Loop Concentration - Specials Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.3.21	Unbundled Loop Concentration - TEST CIRCUIT Card	$35.63	$14.96	$14.88	$34.68	$16.59	$16.50
A.3.21	Unbundled Loop Concentration - TEST CIRCUIT Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.3.22	Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data	$10.80	$14.96	$14.88	$10.51	$16.59	$16.50
A.3.22	Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.4	4-WIRE ANALOG VOICE GRADE LOOP						
A.4.1	4-Wire Analog Voice Grade Loop						
	Zone 1	$21.23	$151.34	$103.82	$23.02	$167.86	$115.15
	Zone 2	$29.41	$151.34	$103.82	$31.07	$167.86	$115.15
	Zone 3	$55.63	$151.34	$103.82	$60.02	$167.86	$115.15
	Zone 4						
	Zone 5						
	Zone 6						
A.4.1	4-Wire Analog Voice Grade Loop - Disconnect Only		$60.47	$14.02		$67 08	$15.56

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.5 **2-WIRE ISDN DIGITAL GRADE LOOP**						
A.5.1 2-Wire ISDN Digital Grade Loop						
Zone 1	$20.44	$133.15	$85.12	$21.76	$147.69	$94.41
Zone 2	$28.31	$133.15	$85.12	$29.38	$147.69	$94.41
Zone 3	$53.56	$133.15	$85.12	$56.76	$147.69	$94.41
Zone 4						
Zone 5						
Zone 6						
A.5.1 2-Wire ISDN Digital Grade Loop - Disconnect Only		$56.10	$9.65		$62.23	$10.71
A.5.6 Universal Digital Channel						
Zone 1	$20.44	$133.15	$85.12	$21.76	$147.69	$94.41
Zone 2	$28.31	$133.15	$85.12	$29.38	$147.69	$94.41
Zone 3	$53.56	$133.15	$85.12	$56.76	$147.69	$94.41
Zone 4						
Zone 5						
Zone 6						
A.5.6 Universal Digital Channel - Disconnect Only		$56.10	$9.65		$62.23	$10.71
A.6 **2-WIRE ASYMMETRICAL DIGITAL SUBSCRIBER LINE (ADSL) COMPATIBLE LOOP**						
A.6.1 2-Wire ADSL Compatible Loop (Non-recurring w/LMU)						
Zone 1	$11.52			$12.65		
Zone 2	$15.96			$17.08		
Zone 3	$30.19			$33.00		
Zone 4						
Zone 5						
Zone 6						
A.6.1wLMU 2-Wire ADSL Digital Subscriber Line Compatible Loop (Non-recurring with LMU)		$134.80	$93.62		$149.53	$103.85
A.6.1wL 2-Wire ADSL Digital Subscriber Line Compatible Loop (Non-recurring with LMU) - Disc. Only		$67.66	$14.09		$75.05	$15.63
A.6.1woL 2-Wire ADSL Digital Subscriber Line Compatible Loop (Non-recurring without LMU)		$112.55	$64.12		$124.83	$71.12
A.6.1woL 2-Wire ADSL Digital Subscriber Line Compatible Loop (Non-recurring without LMU) - Disc. Only		$54.67	$8.22		$60.64	$9.12

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ELEMENT NUMBER & DESCRIPTION		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.7	2-WIRE HIGH BIT RATE DIGITAL SUBSCRIBER LINE (HDSL) COMPATIBLE LOOP						
A.7.1	2-Wire HDSL Compatible Loop						
	Zone 1	$9.12			$9.97		
	Zone 2	$12.63			$13.46		
	Zone 3	$23.90			$26.00		
	Zone 4						
	Zone 5						
	Zone 6						
A.7.1wL	2-Wire HDSL Compatible Loop (Nonrecurring with LMU)		$143.43	$102.25		$159.09	$113.41
A.7.1wL	2-Wire HDSL Compatible Loop (Nonrecurring with LMU) - Disc. Only		$67.66	$14.09		$75.05	$15.63
A.7.1woL	2-Wire HDSL Compatible Loop (Nonrecurring without LMU)		$121.17	$72.75		$134.40	$80.69
A.7.1woL	2-Wire HDSL Compatible Loop (Nonrecurring without LMU) - Disc. Only		$54.67	$8.22		$60.64	$9.12

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		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.8	4-WIRE HIGH BIT RATE DIGITAL SUBSCRIBER LINE (HDSL) COMPATIBLE LOOP						
A.8.1	4-Wire HDSL Compatible Loop						
	Zone 1	$14.24			$15.69		
	Zone 2	$19.72			$21.17		
	Zone 3	$37.31			$40.90		
	Zone 4						
	Zone 5						
	Zone 6						
A.8.1wL	4-Wire HDSL Compatible Loop (Nonrecurring with LMU)		$174.28	$125.30		$193.31	$138.98
A.8.1wL	4-Wire HDSL Compatible Loop (Nonrecurring with LMU) - Disc. Only		$69.56	$11.37		$77.15	$12.61
A.8.1woL	4-Wire HDSL Compatible Loop (Nonrecurring without LMU)		$152.02	$104.11		$168.62	$115.47
A.8.1woL	4-Wire HDSL Compatible Loop (Nonrecurring without LMU) - Disc. Only		$56.57	$10.12		$62.74	$11.22
A.9	4-WIRE DS1 DIGITAL LOOP	$69.22	$282.15	$163.51	$73.44	$313.75	$181.48
A.9.1	4-Wire DS1 Digital Loop	$95.89	$282.15	$163.51	$99.13	$313.75	$181.48
	Zone 1	$181.38	$282.15	$163.51	$191.51	$313.75	$181.48
	Zone 2						
	Zone 3						
	Zone 4						
	Zone 5						
	Zone 6						
A.9.1	4-Wire DS1 Digital Loop - Disconnect Only		$47.40	$10.22		$61.22	$13.53

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.9.2 Sub-Loop Feeder Per 4-Wire DS1 Digital Loop						
Zone 1	$43.64	$120.61	$7,034.00	$46.27	$133.77	$78.02
Zone 2	$60.45	$120.61	$70.34	$62.45	$133.77	$78.02
Zone 3	$114.36	$120.61	$70.34	$120.65	$133.77	$78.02
Zone 4						
Zone 5						
Zone 6						
A.9.2 Sub-Loop Feeder Per 4-Wire DS1 Digital Loop - Disconnect Only		$65.07	$16.20		$85.16	$21.21
A.10 4-WIRE 19, 56 OR 64 KBPS DIGITAL GRADE LOOP						
A.10.1 4-Wire 19, 56 or 64 Kbps Digital Grade Loop						
Zone 1	$24.48	$145.66	$98.14	$26.39	$161.56	$108.85
Zone 2	$33.91	$145.66	$98.14	$35.62	$161.56	$108.85
Zone 3	$64.14	$145.66	$98.14	$68.82	$161.56	$108.85
Zone 4						
Zone 5						
Zone 6						
A.10.1 4-Wire 19, 56 or 64 Kbps Digital Grade Loop - Disconnect Only		$60.47	$14.02		$67.08	$15.56
A.12 CONCENTRATION PER SYSTEM PER FEATURE ACTIVATED (OUTSIDE CENTRAL OFFICE)						
A.12.1 Unbundled Loop Concentration - System A (TR008)	$448.00	$201.54	$109.03	$455.13	$223.53	$120.93
A.12.1 Unbundled Loop Concentration - System A (TR008) - Disconnect Only		$100.77	$31.39		$111.77	$34.81
A.12.2 Unbundled Loop Concentration - System B (TR008)	$78.02	$201.54	$109.03	$79.96	$223.53	$120.93
A.12.2 Unbundled Loop Concentration - System B (TR008) - Disconnect Only		$100.77	$31.39		$111.77	$34.81
A.12.3 Unbundled Loop Concentration - System A (TR303)	$481.07	$201.54	$109.03	$488.67	$223.53	$120.93
A.12.3 Unbundled Loop Concentration - System A (TR303) - Disconnect Only		$100.77	$31.39		$111.71	$34.81
A.12.4 Unbundled Loop Concentration - System B (TR303)	$111.09	$201.54	$109.03	$113.49	$223.53	$120.93
A.12.4 Unbundled Loop Concentration - System B (TR303) - Disconnect Only		$100.77	$31.39		$111.77	$34.81
A.12.5 Unbundled Sub-loop Concentration - USLC Feeder Interface						

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
Zone 1	$42.81	$120.61	$70.34	$45.17	$133.77	$78.02
Zone 2	$59.30	$120.61	$70.34	$60.97	$133.77	$78.02
Zone 3	$112.17	$120.61	$70.34	$117.79	$133.77	$78.02
A.12.5 Unbundled Sub-loop Concentration - USLC Feeder Interface - Disconnect Only		$65.07	$16.20		$85.16	$21.21
A.12.6 Unbundled Loop Concentration - POTS Card	$2.00	$14.96	$14.88	$2.03	$16.59	$16.50
A.12.6 Unbundled Loop Concentration - POTS Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.12.7 Unbundled Loop Concentration - ISDN (Brite Card)	$7.99	$14.96	$14.88	$8.11	$16.59	$16.50
A.12.7 Unbundled Loop Concentration - ISDN (Brite Card) - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.12.8 Unbundled Loop Concentration - SPOTS Card	$11.88	$14.96	$14.88	$12.05	$16.59	$16.50
A.12.8 Unbundled Loop Concentration - SPOTS Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.12.9 Unbundled Loop Concentration - Specials Card	$7.09	$14.96	$14.88	$35.12	$16.59	$16.50
A.12.9 Unbundled Loop Concentration - Specials Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.12.10 Unbundled Loop Concentration - TEST CIRCUIT Card	$34.64	$14.96	$14.88	$10.65	$16.59	$16.50
A.12.10 Unbundled Loop Concentration - TEST CIRCUIT Card - Disconnect Only		$6.11	$6.07		$6.77	$6.73
A.12.11 Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data	$10.50	$14.96	$14.88	$10.65	$16.59	$16.50
A.12.11 Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data - Disconnect Only		$6.11	$6.07		$6.77	$6.73

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		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.13	2-WIRE COPPER LOOP						
A.13.1	2-Wire Copper Loop - short						
	Zone 1	$11.52			$12.65		
	Zone 2	$15.96			$17.08		
	Zone 3	$30.19			$33.00		
	Zone 4						
	Zone 5						
	Zone 6						
A.13.1wL	2-Wire Copper Loop - short (Nonrecurring with LMU)		$133.88	$92.70		$148.50	$102.82
A.13.1wL	2-Wire Copper Loop - short (Nonrecurring with LMU) - Disc. Only		$67.66	$14.09		$75.05	$15.63
A.13.1woL	2-Wire Copper Loop - short (Nonrecurring without LMU)		$111.62	$63.19		$123.81	$70.09
A.13.1woL	2-Wire Copper Loop - short (Nonrecurring without LMU) - Disc. Only		$54.67	$8.22		$60.64	$9.12
A.13.7	2-Wire Copper Loop - long						
	Zone 1	$33.57			$37.07		
	Zone 2	$46.50			$50.04		
	Zone 3	$87.96			$96.67		
	Zone 4						
	Zone 5						
	Zone 6						
A.13.7wL	2-Wire Copper Loop - long (Nonrecurring with LMU)		$133.88	$92.70		$148.50	$102.82
A.13.7wL	2-Wire Copper Loop - long (Nonrecurring with LMU) - Disc. Only		$67.66	$14.09		$75.05	$15.63
A.13.7woL	2-Wire Copper Loop - long (Nonrecurring without LMU)		$111.62	$63.19		$123.81	$70.09
A.13.7woL	2-Wire Copper Loop - long (Nonrecurring without LMU) - Disc. Only		$54.67	$8.22		$60.64	$9.12

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		COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
ELEMENT NUMBER & DESCRIPTION		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.14	4-WIRE COPPER LOOP						
A.14.1	4-Wire Copper Loop - short						
	Zone 1	$16.18			$18.03		
	Zone 2	$22.41			$24.34		
	Zone 3	$42.39			$47.02		
	Zone 4						
	Zone 5						
	Zone 6						
A.14.1wL	4-Wire Copper Loop - short (Nonrecurring with LMU)		$160.36	$119.69		$177.87	$132.76
A.14.1wL	4-Wire Copper Loop - short (Nonrecurring with LMU) - Disc. Only		$69.56	$15.99		$77.15	$17.73
A.14.1woL	4-Wire Copper Loop - short (Nonrecurring without LMU)		$138.10	$90.19		$153.18	$100 03
A.14.1woL	4-Wire Copper Loop - short (Nonrecurring without LMU) - Disc. Only		$56.57	$10.12		$62.74	$11.22
A.14.7	4-Wire Copper Loop - long						
	Zone 1	$57.88			$64.52		
	Zone 2	$80.18			$87.09		
	Zone 3	$151.67			$168.25		
	Zone 4						
	Zone 5						
	Zone 6						
A.14.7wL	4-Wire Copper Loop - long (Nonrecurring with LMU)		$160.36	$119.69		$177.87	$132.76
A.14.7wL	4-Wire Copper Loop - long (Nonrecurring with LMU) - Disc. Only		$69.56	$15.99		$77.15	$17.73
A.14.7woL	4-Wire Copper Loop - long (Nonrecurring without LMU)		$138.10	$90.19		$153.18	$100.03
A.14.7woL	4-Wire Copper Loop - long (Nonrecurring without LMU) - Disc. Only		$56.57	$10.12		$62.74	$11.22

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.15 UNBUNDLED NETWORK TERMINATING WIRE (NTW)						
A.15.1 Unbundled Network Terminating Wire (NTW) per Pair	$0.3682	$21.85		$0.2286	$18.02	
A.16 HIGH CAPACITY UNBUNDLED LOCAL LOOP						
A.16.1 High Capacity Unbundled Local Loop - DS3 - Facility Termination	$387.10	$501.59	$309.24	$386.88	$556.37	$343.01
A.16.1 High Capacity Unbundled Local Loop - DS3 - Facility Termination - Disconnect Only		$125.43	$87.30		$139.13	$96.84
A.16.2 High Capacity Unbundled Local Loop - DS3 - Per Mile	$10.06			$10.92		
A.16.4 High Capacity Unbundled Local Loop - OC3 - Facility Termination	$619.03	$505.87	$239.13	$618.65	$561.12	$265.23
A.16.4 High Capacity Unbundled Local Loop - OC3 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
A.16.5 High Capacity Unbundled Local Loop - OC3 - Per Mile	$7.63			$8.29		
A.16.7 High Capacity Unbundled Local Loop - OC12 - Facility Termination	$1,966.00	$613.87	$239.13	$1,965.00	$680.93	$265.23
A.16.7 High Capacity Unbundled Local Loop - OC12 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
A.16.8 High Capacity Unbundled Local Loop - OC12 - Per Mile	$9.39			$10.20		
A.16.10 High Capacity Unbundled Local Loop - OC48 - Facility Termination	$1,586.00	$613.87	$239.13	$1,610.00	$680.93	$265.23
A.16.10 High Capacity Unbundled Local Loop - OC48 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
A.16.11 High Capacity Unbundled Local Loop - OC48 - Per Mile	$30.81			$33.45		
A.16.13 High Capacity Unbundled Local Loop - OC48 - Interface OC12 on OC48	$553.81	$393.70	$190.95	$561.59	$436.71	$211.79
A.16.13 High Capacity Unbundled Local Loop - OC48 - Interface OC12 on OC48 - Disconnect Only		$64.94	$63.61		$72.03	$70.56
A.16.15 High Capacity Unbundled Local Loop - STS-1 - Facility Termination	$426.68	$501.59	$309.24	$426.60	$556.37	$343.01
A.16.15 High Capacity Unbundled Local Loop - STS-1 - Facility Termination - Disconnect Only		$125.43	$87.30		$139.13	$96.84
A.16.16 High Capacity Unbundled Local Loop - STS-1 - Per Mile	$10.06			$10.92		

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.17 LOOP CONDITIONING						
A.17.1 Unbundled Loop Modification - Load Coil / Equipment Removal - short		$0.00			$0.00	
A.17.2 Unbundled Loop Modification - Load Coil / Equipment Removal - long - First and Additional		$309.32			$343.12	
A.17.3 Unbundled Loop Modification - Bridged Tap Removal'		$9.48			$10.52	
A.17.4 Unbundled Loop Modification - Additive		$0.00			$0.00	
A.17.5 Unbundled Sub-Loop Mod. - 2W/4W Copper Distribution Load Coil/Equip. Removal First/Add'l		$9.11			$10.11	
A.17.6 Unbundled Sub-Loop Modification - 2W/4W Copper Distrib. Bridged Tap Removal First/Add'l		$14.05			$15.58	
A.18 MULTIPLEXERS						
A.18.1 Channelization - Channel System DS1 to DS0	$151.74	$91.44	$64.57	$146.77	$101.42	$71.62
A.18.1 Channelization - Channel System DS1 to DS0 - Disconnect Only		$10.00	$9.46		$11.09	$10.49
A.18.2 Interface Unit - Interface DS1 to DS0 - OCU-DP Card	$2.16	$9.08	$6.38	$2.10	$10.07	$7.08
A.18.3 Interface Unit - Interface DS1 to DS0 - BRITE Card	$3.76	$9.08	$6.38	$3.66	$10.07	$7.08
A.18.4 Interface Unit - Interface DS1 to DS0 - Voice Grade Card	$1.42	$9.08	$6.38	$1.38	$10.07	$7.08
A.18.5 Channelization - Channel System DS3 to DS1	$218.70	$179.66	$106.96	$211.19	$199.28	$118.64
A.18.5 Channelization - Channel System DS3 to DS1 - Disconnect Only		$36.37	$35.22		$40.34	$39.07
A.18.6 Interface Unit - Interface DS3 to DS1	$14.24	$9.08	$6.38	$13.76	$10.07	$7.08
A.19 LOOP TESTING BEYOND VOICE GRADE						
A.19.1 Loop Testing Beyond VG - Basic per 1/2 hour		$76.79	$32.99		$77.09	$33.12
A.19.2 Loop Testing Beyond VG - Overtime per 1/2 hour		$100.37	$43.26		$100.76	$43.43
A.19.3 Loop Testing Beyond VG - Premium per 1/2 hour		$123.94	$53.53		$124.43	$53.74

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
B.0 **UNBUNDLED LOCAL EXCHANGE PORTS AND FEATURES**						
B.1 **EXCHANGE PORTS**						
B.1.1 Exchange Ports - 2-Wire Analog Line Port (Res., Bus., Centrex, Coin)	$1.34	$3.37	$3.27	$1.40	$3.74	$3.63
B.1.1 Exchange Ports - 2-Wire Analog Line Port (Res., Bus., Centrex, Coin) - Disconnect Only		$1.69	$1.62		$1.88	$1.80
B.1.2 Exchange Ports - 4-Wire Analog Voice Grade Port	$8.33	$3.37	$3.27	$8.20	$3.74	$3.63
B.1.2 Exchange Ports - 4-Wire Analog Voice Grade Port - Disconnect Only		$1.69	$1.62		$1.88	$1.80
B.1.3 Exchange Ports - 2-Wire DID Port	$8.81	$70.69	$14.26	$8.73	$78.41	$15.82
B.1.3 Exchange Ports - 2-Wire DID Port - Disconnect Only		$37.81	$3.84		$41.94	$4.26
B.1.4 Exchange Ports - DDITS Port	$52.73	$136.24	$70.10	$54.95	$151.11	$77.75
B.1.4 Exchange Ports - DDITS Port - Disconnect Only		$44.00	$2.80		$48.81	$3.10
B.1.5 Exchange Ports - 2-Wire ISDN Port	$8.46	$42.22	$45.69	$8.83	$46.83	$50.68
B.1.5 Exchange Ports - 2-Wire ISDN Port - Disconnect Only		$24.91	$10.75		$27.64	$11.93
B.1.6 Exchange Ports - 4-Wire ISDN DS1 Port	$79.35	$157.42	$85.80	$82.74	$174.61	$95.17
B.1.6 Exchange Ports - 4-Wire ISDN DS1 Port - Disconnect Only		$44.89	$16.43		$49.80	$18.23
B.1.7 Exchange Ports - 2-Wire Analog Line Port (PBX)	$1.34	$35.22	$16.39	$1.40	$39.06	$18.18
B.1.7 Exchange Ports - 2-Wire Analog Line Port (PBX) - Disconnect Only		$11.14	0.6480		$12.35	$0.7187
B.4 **FEATURES**						
B.4.10 Centrex Functionality	$0.00			$0.00		
B.4.13 Features per port	$2.17			$2.26		
C.0 **UNBUNDLED SWITCHING AND LOCAL INTERCONNECTION**						
C.1 **END OFFICE SWITCHING**						
C.1.1 End Office Switching Function, Per MOU	$0.0007341			$0.0007662		
C.1.2 End Office Trunk Port - Shared, Per MOU	$0.0001571			$0.0001640		
C.2 **TANDEM SWITCHING**						
C.2.1 Tandem Switching Function Per MOU	$0.0001263			$0.0001319		
C.2.2 Tandem Trunk Port - Shared, Per MOU	$0.0002252			$0.0002350		

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ELEMENT NUMBER & DESCRIPTION		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
D.0	UNBUNDLED TRANSPORT AND LOCAL INTEROFFICE TRANSPORT						
D.1	COMMON TRANSPORT						
D.1.1	Common Transport - Per Mile, Per MOU	$0.0000034			0.0000035		
D.1.2	Common Transport - Facilities Termination Per MOU	$0.0004493			0.0004372		
D.2	INTEROFFICE TRANSPORT - DEDICATED - VOICE GRADE						
D.2.1	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Per Mile	$0.0084			$0.0091		
D.2.2	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination	$26.02	$42.69	$28.66	$25.32	$47.35	$31.78
D.2.2	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination - Disconnect Only		$16.51	$6.34		$18.31	$7.03

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ELEMENT NUMBER & DESCRIPTION		COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
D.3	INTEROFFICE TRANSPORT - DEDICATED - DS0 - 56/64 KBPS						
D.3.1	Interoffice Transport - Dedicated - DS0 - Per Mile	$0.0084			$0.0091		
D.3.2	Interoffice Transport - Dedicated - DS0 - Facility Termination	$18.95	$42.69	$28.66	$18.44	$47.35	$31.78
D.3.2	Interoffice Transport - Dedicated - DS0 - Facility Termination - Disconnect Only		$16.51	$6.34		$18.31	$7.03
D.4	INTEROFFICE TRANSPORT - DEDICATED - DS1						
D.4.1	Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination	$90.87	$95.16	$88.78	$88.44	$105.54	$98.47
D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination - Disconnect Only		$16.74	$14.85		$21.47	$19.05
D.5	LOCAL CHANNEL - DEDICATED						
D 5.1	Local Channel - Dedicated - 2-Wire Voice Grade						
	Zone 1	$21.04	$239.67	$42.34	$21.94	$265.84	$46.97
	Zone 2	$29.15	$239.67	$42.34	$29.62	$265.84	$46.97
	Zone 3	$55.14	$239.67	$42.34	$57.22	$265.84	$46.97
D.5.1	Local Channel - Dedicated - 2-Wire Voice Grade - Disconnect Only		$33.93	$3.61		$37.63	$4.00
D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade						
	Zone 1	$21.91	$240.30	$42.97	$22.81	$266.54	$47.67
	Zone 2	$30.35	$240.30	$42.97	$30.79	$266.54	$47.67
	Zone 3	$57.40	$240.30	$42.97	$59.48	$266.54	$47.67
D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade - Disconnect Only		$34.47	$4.15		$44.22	$5.33
D.5.7	Local Channel - Dedicated - DS3 - Per Mile	$7.83			$8.50		

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ELEMENT NUMBER & DESCRIPTION		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
D.5.8	Local Channel - Dedicated - DS3 - Facility Termination	$554.83	$501.59	$309.24	$531.91	$556.37	$343 01
D.5.8	Local Channel - Dedicated - DS3 - Facility Termination - Disconnect Only		$125.43	$87.30		$139.13	$96.84
D.5.10	Local Channel - Dedicated - OC3 - Per Mile	$6.58			$7.14		
D.5.11	Local Channel - Dedicated - OC3 - Facility Termination	$931.25	$505 87	$239.13	$892.72	$561.12	$265.23
D.5.11	Local Channel - Dedicated - OC3 - Facility Termination - Disconnect Only·		$64.94	$63.61		$72.03	$70.56
D.5.13	Local Channel - Dedicated - OC12 - Per Mile	$9.39			$10.20		
D.5.14	Local Channel - Dedicated - OC12 - Facility Termination	$2,727.00	$613.87	$239.13	$2,614.00	$680.93	$265.23
D.5.14	Local Channel - Dedicated - OC12 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.5.16	Local Channel - Dedicated - OC48 - Per Mile	$30.81			$33.45		
D.5.17	Local Channel - Dedicated - OC48 - Facility Termination	$1,888.00	$613.87	$239.13	$1,842.00	$680.93	$265.23
D.5.17	Local Channel - Dedicated - OC48 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.5.19	Local Channel - Dedicated - OC48 - Interface OC12 on OC48	$570.98	$393.70	$190.95	$555.69	$436.71	$211.79
D.5.19	Local Channel - Dedicated - OC48 - Interface OC12 on OC48 - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.5.21	Local Channel - Dedicated - STS-1 - Facility Termination	$563.73	$501.59	$309.24	$540.69	$556.37	$343.01
D.5.21	Local Channel - Dedicated - STS-1 - Facility Termination - Disconnect Only		$125.43	$87.30		$139.13	$96.84
D.5.23	Local Channel - Dedicated - STS-1 - Per Mile	$7.83			$8.50		
D.5.24	Local Channel - Dedicated - DS1						
	Zone 1	$34.49	$195.33	$165.48	$35.28	$216.65	$183.54
	Zone 2	$47.78	$195.33	$165.48	$47.63	$216.65	$183.54
	Zone 3	$90.38	$195.33	$165.48	$92.01	$216.65	$183.54
D.5.24	Local Channel - Dedicated - DS1 - Disconnect Only		$21.90	$15.28		$24.30	$16 95
D.6	INTEROFFICE TRANSPORT - DEDICATED - DS3						
D.6.1	Interoffice Transport - Dedicated - DS3 - Per Mile	$3.57			$3.87		

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D.6.2	Interoffice Transport - Dedicated - DS3 - Facility Termination	$1,101.00	$302.43	$197.70	$1,071.00	$335.46	$219.28
D.6.2	Interoffice Transport - Dedicated - DS3 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.7	INTEROFFICE TRANSPORT - DEDICATED - OC3						
D.7.1	Interoffice Transport - Dedicated - OC3 - Per Mile	$7.04			$7.65		
D.7.2	Interoffice Transport - Dedicated - OC3 - Facility Termination	$2,963.00	$457.69	$190.95	$2,884.00	$507.68	$211.79
D.7.2	Interoffice Transport - Dedicated - OC3 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.8	INTEROFFICE TRANSPORT - DEDICATED - OC12						
D.8.1	Interoffice Transport - Dedicated - OC12 - Per Mile	$22.61			$24.55		
D.8.2	Interoffice Transport - Dedicated - OC12 - Facility Termination	$11,380.00	$565.69	$190.95	$11,076.00	$627.49	$211.79
D.8.2	Interoffice Transport - Dedicated - OC12 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.9	INTEROFFICE TRANSPORT - DEDICATED - OC48						
D.9.1	Interoffice Transport - Dedicated - OC48 - Per Mile	$29.13			$31.62		
D.9.2	Interoffice Transport - Dedicated - OC48 - Facility Termination	$12,226.00	$565.69	$190.95	$11,898.00	$627.49	$211.79
D.9.2	Interoffice Transport - Dedicated - OC48 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.9.4	Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48	$1,177.00	$305.34	$190.95	$1,145.00	$338.68	$211.79
D.9.4	Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48 - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.10	INTEROFFICE TRANSPORT - DEDICATED - STS-1						
D.10.1	Interoffice Transport - Dedicated - STS-1 - Per Mile	$3.57			$3.87		
D.10.2	Interoffice Transport - Dedicated - STS-1 - Facility Termination	$1,085.00	$302.43	$197.70	$1,056.00	$335.46	$219.28

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D.10.2 Interoffice Transport - Dedicated - STS-1 - Facility Termination - Disconnect Only		$64.94	$63.61		$72.03	$70.56
D.12 INTEROFFICE TRANSPORT - DEDICATED - 4-WIRE VOICE GRADE						
D.12.1 Interoffice Transport - Dedicated - 4-Wire Voice Grade - Per Mile	$0.0084			$0.0091		
D.12.2 Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination -	$23.20	$42.69	$28.66	$22.58	$47.35	$31.78
D.12.2 Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination - Disconnect Only		$16.51	$6.34		$18.31	$7.03
E.0 SIGNALING NETWORK, DATA BASES, & SERVICE MANAGEMENT SYSTEMS						
E.1 800 ACCESS TEN DIGIT SCREENING						
E.1.1 800 Access Ten Digit Screening, Per Call	$0.0006165			$0.0006252		
E.1.2 800 Access Ten Digit Screening, Reservation Charge Per 800 Number Reserved		$3.74	$0.64		$4.15	$0.70
E.1.3 800 Access Ten Digit Screening, Per 800 No. Established W/O POTS Translations		$7.92	$1.06		$8.78	$1.18
E.1.3 800 Access Ten Digit Screening, Per 800 No. Established W/O POTS Translations - Disc. Only		$5.20	$0.64		$5.77	$0.70
E.1.4 800 Access Ten Digit Screening, Per 800 No. Established With POTS Translations		$7.92	$1.06		$8.78	$1.18
E.1.4 800 Access Ten Digit Screening, Per 800 No. Established With POTS Translations - Disc. Only		$5.20	$0.64		$5.77	$0.70
E.1.5 800 Access Ten Digit Screening, Customized Area of Service Per 800 Number		$3.74	$1.87		$4.15	$2.07
E.1.6 800 Access Ten Digit Screening, Multiple InterLATA CXR Routing Per CXR Requested Per 800 No.		$4.37	$2.50		$4.85	$2.78
E.1.7 800 Access Ten Digit Screening, Change Charge Per Request		$4.37	$0.64		$4.85	$0.70
E.1.8 800 Access Ten Digit Screening, Call Handling and Destination Features		$3.74			$4.15	
E.1.9 800 Access Ten Digit Screening, w/ 8FL No. Delivery	$0.0006165			$0.0006252		
E.1.10 800 Access Ten Digit Screening, w/ POTS No. Delivery	$0.0006165			$0.0006252		

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E.2 **LINE INFORMATION DATA BASE ACCESS (LIDB)**						
E.2.1 LIDB Common Transport Per Query	$0.0000195			$0.0000203		
E.2.2 LIDB Validation Per Query	$0.0132254			$0.0136959		
E.2.3 LIDB Originating Point Code Establishment or Change		$49.71			$55.13	
E.2.3 LIDB Originating Point Code Establishment or Change - Disconnect Only		$49.71			$55.13	
E.3 **CCS7 SIGNALING TRANSPORT**						
E.3.1 CCS7 Signaling Connection, Per 56Kbps Facility	$18.39	$39.28		$17.93	$43.57	
E.3.1 CCS7 Signaling Connection, Per 56Kbps Facility - Disconnect Only		$16.51			$18.31	
E.3.2 CCS7 Signaling Termination, Per STP Port	$129.77			$135 05		
E.3.3 CCS7 Signaling Usage, Per Call Setup Message	$0.0000148			$0.0000152		
E.3.4 CCS7 Signaling Usage, Per TCAP Message	$0.0000592			$0.0000607		
E.3.7 CCS7 Signaling Connection, Per link (A link)	-$18.39			$17.93		
E.3.8 CCS7 Signaling Connection, Per link (B link) (also known as D link)	$18.39			$17.93		
E.3.9 CCS7 Signaling Usage, Per ISUP Message	$0.0000148			$0.0000152		
E.3.10 CCS7 Signaling Usage Surrogate, per link	$676.89			$694.32		
E.3.11 CCS7 Signaling Point Code, Establishment or Change, per STP affected		$41.50			$46.03	
E.3.11 CCS7 Signaling Point Code, Establishment or Change, per STP affected - Disconnect Only		$41.50			$46.03	
E.4 **BELLSOUTH CALLING NAME (CNAM) DATABASE (DB) SERVICE**						
E.4.1 CNAM for DB Owners - Service Establishment, Manual		$22.85			$25.35	
E.4.1 CNAM for DB Owners - Service Establishment, Manual - Disconnect Only		$17.14			$19.01	
E.4.2 CNAM for Non DB Owners - Service Establishment, Manual		$22.85			$25.35	
E.4.2 CNAM for Non DB Owners - Service Establishment, Manual - Disconnect Only		$17.14			$19.01	
E.4.3 CNAM for DB Owners Service Provisioning with Point Code Establishment		$1,435.00	$1,061.00		$1,592.00	$1,177.00

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
E.4.3 CNAM for DB Owners Service Provisioning with Point Code Establishment - Disconnect Only		$317.70	$233.60		$352.36	$259.09
E.4.4 CNAM for Non DB Owners Service Provisioning with Point Code Establishment		$492.73	$355.07		$546.51	$393.82
E.4.4 CNAM for Non DB Owners Service Provisioning with Point Code Establishment - Disc. Only		$322.83	$233.60		$358.06	$259.09
E.4.5 CNAM for DB and Non DB Owners, Per Query	$0.0010161			$0.0010240		
E.5 BELLSOUTH ACCESS TO E911 SERVICE						
E.5.1 BellSouth E911 Access - Local Channel - Dedicated - 2-wire Voice Grade (Same as D.5.1)						
Zone 1	$21.04	$239.67	$42.34	$21.94	$265.84	$46.97
Zone 2	$29.15	$239.67	$42.34	$29.62	$265.84	$46.97
Zone 3	$55.14	$239.67	$42.34	$57.22	$265.84	$46.97
BellSouth E911 Access - Local Channel - Dedicated - 2-wire Voice Grade (Same as D.5.1) - Disc. Only		$33.93	$3.61		$37.63	$4.00
E.5.2 BellSouth E911 Access - Interoffice Transport - Dedicated - 2-wire Voice Grade Per Mile (Same as D.2.1)	$0.0084			$0.0091		
E.5.3 BellSouth E911 Access - Interoffice Transport - Dedicated 2-wire Voice Grade Per Fac. Term (same as D.2.2)	$26.02	$42.69	$28.66	$25.32	$47.35	$31.78
E.5.3 BellSouth E911 Access - Interoffice Transport - Dedicated 2-wire Voice Grade Per Fac. Term- Disc. Only (same as D.2.2)		$16.51	$6.34		$18.31	$7.03
E.5.4 BellSouth E911 Access - Local Channel - Dedicated - DS1 (Same as D.5.24)						
Zone 1	$34.49	$195.33	$165.48	$35.28	$216.65	$183.54
Zone 2	$47.78	$195.33	$165.48	$47.63	$216.65	$183.54
Zone 3	$90.38	$195.33	$165.48	$92.01	$216.65	$183.54
E.5.4 BellSouth E911 Access - Local Channel - Dedicated - DS1 (Same as D.5.24) - Disconnect Only		$21.90	$15.28			
E.5.5 BellSouth E911 Access - Interoffice Transport - Dedicated - DS1 Per Mile (Same as D.4.1)	$0.1710			$0.1856		
E.5.6 BellSouth E911 Access - Interoffice Transport - Dedicated - DS1 Per Facility Termination (Same as D.4.2)	$90.87	$95.16	$88.78	$88.44	$105.54	$98.47

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
BellSouth E911 Access - Interoffice Transport - Dedicated - DS1 Per Facility Termination - Disc. Only (same as D.4.2)		$16.74	$14.85		$21.47	$19.05
E.6 LNP QUERY SERVICE						
E.6.1 LNP Cost Per query	$0.000842			$0.0008520		
E.6.2 LNP Service Establishment Manual		$12.46			$13.83	
E.6.2 LNP Service Establishment Manual - Disconnect Only		$9.35			$12.71	
E.6.3 LNP Service Provisioning with Point Code Establishment		$591.01	$301.93		$655.50	$334.88
E.6.3 LNP Service Provisioning with Point Code Establishment - Disconnect Only		$218.42	$160.60		$297.03	$218.40
G.0 SELECTIVE ROUTING						
G.9 SELECTIVE ROUTING (INTERIM SOLUTION LINE CLASS CODES)						
G.9.1 Selective Routing Per Unique Line Class Code Per Request Per Switch		$84.33			$93.55	
G.9.1 Selective Routing Per Unique Line Class Code Per Request Per Switch - Disconnect Only		$11.46			$12.71	
G.11 SELECTIVE CARRIER ROUTING (AIN SOLUTION)						
G.11.1 Service Establishment per CLEC		$191,575.00			$193,444.00	
G.11.1 Service Establishment per CLEC - Disconnect Only		$6,974.00			$7,737.00	
G.11.2 Service Establishment per End Office		$168.89			$187.36	
G.11.2 Service Establishment per End Office - Disconnect Only		$0.63			$0 69	
G.11.4 Query Cost	$0.0030998			$0.0031868		
I.0 INTERIM SERVICE PROVIDER NUMBER PORTABILITY						
I.1 INTERIM SERVICE PROVIDER NUMBER PORTABILITY - RCF						
I.1.1 Service Provider Number Portability - RCF, Per Number Ported	$1.97	0.3738		$2.05	$0.4145	
I.1.1 Service Provider Number Portability - RCF, Per Number Ported - Disconnect Only		0.0374			$0.0415	
I.1.2 Service Provider Number Portability - RCF, Per Additional Path	0.6878			$0.7179		

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		RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
I.2	SERVICE PROVIDER NUMBER PORTABILITY - DID						
I.2.1	Service Provider Number Portability - DID, Per Number Ported, Residence		0.6242			$0.6923	
I.2.1	Service Provider Number Portability - DID, Per Number Ported, Residence - Disconnect Only		0.6242			$0.6923	
I.2.2	Service Provider Number Portability - DID, Per Number Ported, Business		0.6242			$0.6923	
I.2.2	Service Provider Number Portability - DID, Per Number Ported, Business - Disconnect Only		0.6242			$0.6923	
I.2.4	Service Provider Number Portability - DID, Per Trunk Termination, Initial	$52.73	$145.42		$54.95	$161.29	
I.2.4	Service Provider Number Portability - DID, Per Trunk Termination, Initial - Disconnect Only		$29.51			$32.73	
I.2.5	Service Provider Number Portability - DID, Per Trunk Termination, Subsequent	$52.73	$72.65		$54.95	$80.58	
I.2.5	Service Provider Number Portability - DID, Per Trunk Termination, Subsequent - Disconnect Only		$29.51			$32.73	
I.4	SERVICE PROVIDER NUMBER PORTABILITY RIPH						
I.4.1	Service Provider Number Portability - RIPH, Functionality, Per Central office		$81.56			$90.47	
I.4.1	Service Provider Number Portability - RIPH, Functionality, Per Central office - Disconnect Only		$2.29			$2.54	
I.4.2	Service Provider Number Portability - RIPH, Functionality, Per Rearrangement		$18.11			$20.08	
I.4.3	Service Provider Number Portability - RI-PH, Per Number Ported	$1.75	0.1952		$1.83	$0.2165	
I.4.3	Service Provider Number Portability - RI-PH, Per Number Ported - Disconnect Only		0.0195			$0.0216	
J.0	OTHER						
J.1	DARK FIBER						
J.1.2	Dark Fiber, Per Four Fiber Strands, Per Route Mile or Fraction Thereof - Local Channel/Loop	$54.11	$677.37	$174.79	$55.04	$751.34	$193.88
J.1.2	Dark Fiber, Per 4 Fiber Strands, Per Route Mile or Fraction Thereof - Local Chan/Loop - Disc. Only		$277.72	$179.41		$356.21	$230.11

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	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
ELEMENT NUMBER & DESCRIPTION	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
J.1.3 Dark Fiber, Per Four Fiber Strands, Per Route Mile or Fraction Thereof - Interoffice	$25.14	$677.37	$174.79	$26.85	$751.34	$193.88
J.1.3 Dark Fiber, Per Four Fiber Strands, Per Route Mile or Fraction Thereof - Interoffice - Disc. Only		$277.72	$179.41		$356.21	$230.11
J.3 LOOP MAKE-UP						
J.3.1 Mechanized Loop Make-up	$0.6757			$0.6784		
J.3.3 Manual Loop Make-up w/o Facility Reservation Number		$43.10			$52.17	
J.3.4 Manual Loop Make-up w/ Facility Reservation Number		$45.72			$55.07	
J.5 ACCESS TO THE DCS						
J.5.1 Customer Reconfiguration Establishment		$1.47			$1.63	
J.5.1 Customer Reconfiguration Establishment - Disconnect Only		$1.47			$1.63	
J.5.2 DS1 DCS Termination with DS0 Switching	$28.81	$29.65	$21.26	$27.39	$32.89	$23.58
J.5.2 DS1 DCS Termination with DS0 Switching - Disconnect Only		$15.29	$11.51		$16.96	$12.77
J.5.3 DS1 DCS Termination with DS1 Switching	$12.19	$22.60	$14.21	$11.70	$25.07	$15.76
J.5.3 DS1 DCS Termination with DS1 Switching - Disconnect Only		$11.77	$7.99		$13.05	$8.86
J.5.4 DS3 DCS Termination with DS1 Switching	$154.91	$29.65	$21.26	$146.81	$32.89	$23.58
J.5.4 DS3 DCS Termination with DS1 Switching - Disconnect Only		$15.29	$11.51		$16.96	$12.77
K.0 ADVANCED INTELLIGENT NETWORK (AIN) SERVICES						
K.1 BELLSOUTH AIN SMS ACCESS SERVICE						
K.1.1 AIN SMS Access Service - Service Establishment, Per State, Initial Setup		$39.27			$43.56	
K.1.1 AIN SMS Access Service - Service Establishment, Per State, Initial Setup - Disconnect Only		$33.04			$44.93	
K.1.2 AIN SMS Access Service - Port Connection - Dial/Shared Access		$7.79			$8.64	
K.1.2 AIN SMS Access Service - Port Connection - Dial/Shared Access - Disconnect Only		$7.38			$10.03	

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
K.1.3 AIN SMS Access Service - Port Connection - ISDN Access		$7.79			$8.64	
K.1.3 AIN SMS Access Service - Port Connection - ISDN Access - Disconnect Only		$7.38			$10.03	
K.1.4 AIN SMS Access Service - User Identification Codes - Per User ID Code		$34.85			$38.66	
K.1.4 AIN SMS Access Service - User Identification Codes - Per User ID Code - Disconnect Only		$21.97			$29.88	
K.1.5 AIN SMS Access Service - Security Card, Per User ID Code, Initial or Replacement		$73.76			$75.10	
K.1.5 AIN SMS Access Service - Security Card, Per User ID Code, Initial or Replacement - Disc. Only		$9.51			$12.93	
K.1.6 AIN SMS Access Service - Storage, Per Unit (100 Kilobytes)	$0.0029			$0.0028		
K.1.7 AIN SMS Access Service - Session, Per Minute	$0.7985			$0.7809		
K.1.8 AIN SMS Access Service - Company Performed Session, Per Minute	$0.4155			$0.4609		
K.2 BELLSOUTH AIN TOOLKIT SERVICE						
K.2.1 AIN Toolkit Service - Service Establishment Charge, Per State, Initial Setup		$39.27			$43.56	
K.2.1 AIN Toolkit Service - Service Establishment Charge, Per State, Initial Setup - Disconnect Only		$33.04			$44.93	
K.2.2 AIN Toolkit Service - Training Session, Per Customer		$8,406.00			$8,439.00	
K.2.3 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Term. Attempt		$7.79			$8.64	
K.2.3 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Term. Attempt - Disc. Only		$7.38			$10.03	
K.2.4 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Off-Hook Delay		$7.79			$8.64	
K.2.4 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Off-Hook Delay - Disc. Only		$7.38			$10.03	
K.2.5 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Off-Hook Immediate		$7.79			$8.64	
K.2.5 AIN Toolkit Svc - Trigger Access Charge, Per Trigger, Per DN, Off-Hook Immediate - Disc. Only		$7.38			$10.03	
K.2.6 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, 10-Digit PODP		$34.32			$38.06	

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL. (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
K.2.6 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, 10-Digit PODP - Disc. Only		$11.66			$15.86	
K.2.7 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, CDP		$34.32			$38.06	
K.2.7 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, CDP - Disconnect Only		$11.66			$15.86	
K.2.8 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Feature Code		$34.32			$38.06	
K.2.8 AIN Toolkit Service - Trigger Access Charge, Per Trigger, Per DN, Feature Code - Disconnect Only		$11.66			$15.86	
K.2.9 AIN Toolkit Service - Query Charge, Per Query	$0.0509436			$0.0535927		
K.2.10 AIN Toolkit Service - Type 1 Node Charge, Per AIN Toolkit Subscription, Per Node, Per Query	$0.0062787			$0.0063698		
K.2.11 AIN Toolkit Service - SCP Storage Charge, Per SMS Access Account, Per 100 Kilobytes	$0.06			$0.06		
K.2.12 AIN Toolkit Service - Monthly report - Per AIN Toolkit Service Subscription	$8.00	$7.79		$8.34	$8.64	
K.2.12 AIN Toolkit Service - Monthly report - Per AIN Toolkit Service Subscription - Disconnect Only		$4.47			$6.08	
K.2.13 AIN Toolkit Service - Special Study - Per AIN Toolkit Service Subscription	$3.85	$8.62		$3.73	$9.56	
K.2.14 AIN Toolkit Service - Call Event Report - Per AIN Toolkit Service Subscription	$4.28	$7.79		$4.73	$8.64	
K.2.14 AIN Toolkit Service - Call Event Report - Per AIN Toolkit Service Subscription - Disconnect Only		$4.47			$6.08	
K.2.15 AIN Toolkit Service - Call Event Special Study - Per AIN Toolkit Service Subscription	$0.13	$8.62		$0.12	$9.56	
L.0 ACCESS DAILY USAGE FILE (ADUF)						
L.1 ACCESS DAILY USAGE FILE (ADUF)						
L.1.1 ADUF, Message Processing, per message	$0.013928			$0.014391		
L.1.3 ADUF, Data Transmission (CONNECT:DIRECT), per message	$0.00012927			$0.00012973		
M.0 DAILY USAGE FILES						
M.1 ENHANCED OPTIONAL DAILY USAGE FILE						
M.1.1 Enhanced Optional Daily Usage File: Message Processing, Per Message	$0.222451			$0.229109		

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
M.2 OPTIONAL DAILY USAGE FILE						
M.2.1 Optional Daily Usage File: Recording, per Message	$0.0000068			$0.0000071		
M.2.2 Optional Daily Usage File: Message Processing, Per Message	$0.006614			$0.006835		
M.2.3 Optional Daily Usage File: Message Processing, Per Magnetic Tape Provisioned	$48.77			$48.96		
M.2.4 Optional Daily Usage File: Data Transmission (CONNECT:DIRECT), Per Message	$0.00010772			$0.00010811		
N.0 NONRECURRING COSTS						
N.1 SERVICE ORDER						
N.1.1 Electronic Service Order, per local service request		$1.37			$1.52	
N.1.1 Electronic Service Order, per local service request - Disconnect Only		$0.18			$0.20	
N.1.2 Manual Service Order, per local service request		$10.73			$11.90	
N.1.2 Manual Service Order, per local service request - Disconnect Only		$1.65			$1.83	
N.1.5 Order Coordination		$8.12			$9.00	
N.1.6 Order Coordination for Specified Conversion Time		$20.75			$23.02	
P.0 UNBUNDLED LOOP COMBINATIONS						
P.1 2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (RES, BUS, COIN, PBX)						
P.1.1 2-Wire Voice Grade Loop						
Zone 1	$11.89			$12.94		
Zone 2	$16.03			$17.06		
Zone 3	$29.33			$31.87		
Zone 4						
Zone 5						
Zone 6						

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.1 2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (CENTREX)						
P.1.1 2-Wire Voice Grade Loop						
Zone 1	$11.89			$12.94		
Zone 2	$16.03			$17.06		
Zone 3	$29.33			$31.87		
Zone 4						
Zone 5						
Zone 6						
P.1.1 2-W VG Loop with 2-W Line Port (RES, BUS, Coin) - Nonrecurring costs - switch-as-is		$0.0920	$0.0920		$0.1020	$0.1020
P.1.1 2-W VG Loop with 2-W Line Port (PBX) - Nonrecurring costs - switch-as-is		$7.62	$1.72		$8.45	$1.91
P.1.1 2-W VG Loop with 2-W Line Port (Centrex) - Nonrecurring costs - switch-as-is		$4.75	$7.59		$21.50	$8.42
P.1.11 Centrex Common Block - Nonrecurring costs - switch-as-is		$4.66	$7.50		$5.17	$8.32
P.1.2 Exchange Port - 2-Wire Line Port	$1.12			$1.17		
P.1.17 PBX Subsequent Activity - Change/Rearrange Multiline Hunt Group		$7.09			$7.86	
P.3 2-WIRE VOICE GRADE LOOP WITH 2-WIRE DID TRUNK PORT						
Zone 1	$22.22			$23.21		
Zone 2	$27.39			$28.28		
Zone 3	$43.97			$46.53		
P.3.2 Exchange Ports - 2-Wire DID Port for Combinations	$8.79			$8.71		
P.3.3 2-Wire Voice Grade Loop / 2-Wire DID Trunk Port Combination - Nonrecurring Costs - Switch-as-is		$7.08	$1.69		$7.85	$1.87
P.3.7 2-Wire DID Subsequent Activity - Add Trunks, Per Trunk		$29.08			$32.26	

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P.4 2-WIRE ISDN DIGITAL GRADE LOOP WITH 2-WIRE ISDN DIGITAL LINE SIDE PORT						
P.4.1 2-Wire ISDN Digital Grade Loop						
Zone 1	$23.22			$24.71		
Zone 2	$29.44			$30.77		
Zone 3	$49.38			$52.56		
Zone 4						
Zone 5						
Zone 6						
P.4.2 Exchange Port - 2-Wire ISDN Line Side Port	$7.07			$7.38		
P.4.3 2-Wire ISDN Digital Grade Loop / 2-Wire ISDN Line Side Port Comb. - Nonrec. Costs - Switch-as-is		$27.61	$15.33		$25.22	$17.00
P.5 4-WIRE DS1 DIGITAL LOOP WITH 4-WIRE ISDN DS1 DIGITAL TRUNK PORT						
Zone 1	$148.57			$156.18		
Zone 2	$175.24			$181.87		
Zone 3	$260.73			$274.25		
P.5.3 4-Wire DS1 Digital Loop / 4-Wire ISDN DS1 Digital Trunk Port Comb. - Nonrec. Costs - Switch-as-is		$61.25	$55.34		$84.17	$61.38
P.5.5 4-Wire DS1 Dig. Loop/4-Wire ISDN DS1 Dig. Trunk Port Comb - Subseq. Chan. Activation - Per Chan.		$13.96			$15.48	
P.5.6 4-Wire DS1 Dig. Loop / 4-Wire ISDN DS1 Dig. Trunk Port Comb - Subseq. Inw./2-Way Telephone #s		$0.4879			$0.5412	
P.5 7 4-Wire DS1 Dig. Loop / 4-Wire ISDN DS1 Dig. Trunk Port Comb - Subseq. Outw. Telephone #s		$11.46			$12.71	
P.5.8 4-Wire DS1 Dig. Loop / 4-Wire ISDN DS1 Dig. Trunk Port Comb - Subseq. Inw. Telephone #s		$22.92			$25.42	

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.6 2-WIRE VOICE GRADE EXTENDED LOOP WITH DEDICATED DS1 INTEROFFICE TRANSPORT						
P.6-1 First 2W VG in DS1						
Zone 1	$257.46			$251.09		
Zone 2	$262.63			$256.16		
Zone 3	$279.21			$274.41		
P.17.1 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Combination Switch-As-Is - Disc Only		$8.10	$8.10		$8.98	$8.98
Nonrecurring Cost - 2-wire VG Extended Loop with Dedicated DS1 Interoffice Transport - NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost - 2-wire VG Extended Loop with Dedicated DS1 Interoffice Transport - NEW - Disc. Only		$85.75	$23.07		$95.11	$25.60
P.6-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile						
P.6-3 Additional 2W VG in same DS1						
Zone 1	$14.85			$15.88		
Zone 2	$20.02			$20.95		
Zone 3	$36.60			$39.20		
P.17.16 Nonrecurring Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.7 4-WIRE VOICE GRADE EXTENDED WITH DEDICATED DS1 INTEROFFICE TRANSPORT						
P.7-1 First 4W VG in DS1						
Zone 1	$265.26			$259.61		
Zone 2	$273.44			$267.66		
Zone 3	$299.66			$296.61		
P.17.1 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Combination Switch-As-Is-Disc. Only		$8.10	$8.10		$8.98	$8.98

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
Nonrecurring Cost - 4-wire VG Extended Loop with Dedicated DS1 Interoffice Transport - NEW		$330.00	$182.65		$366.04	$202.58
Nonrecurring Cost - 4-wire VG Extended Loop with Dedicated DS1 Interoffice Transport - NEW -Disc. Only		$85.75	$23.07		$95.11	$25.60
P.7-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.7-3 Additional 4W VG in same DS1 -						
Zone 1	$22.65			$24.40		
Zone 2	$30.83			$32.45		
Zone 3	$57.05			$61.40		
P.17.16 Nonrecurring Cost - New Feature activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.8 4-WIRE 56 OR 64 KBPS EXTD. DIGITAL LOOP WITH DEDICATED DS1 INTEROFFICE TRANSPORT						
P.8-1 First 4W 56/64 in DS1						
Zone 1	$269.25			$263.70		
Zone 2	$278.68			$272.93		
Zone 3	$308.91			$306.13		
P.17.1 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Combination Switch-As-Is- Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-wire 56 or 64 Kbps Extended Loop with Dedicated DS1 Interoffice Transport - NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost - 4-wire 56 or 64 Kbps Extd Loop with Ded. DS1 Interoffice Transport - NEW - Disc Only		$85.75	$23.07		$95.11	$25.60
P.8-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.8-3 Additional 4W 56/64 in same DS1						
Zone 1	$26.64			$28.49		
Zone 2	$36.07			$37.72		
Zone 3	$66.30			$70.92		

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.17.16 Nonrecurring Cost - New Feature activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.11 4-WIRE DS1 DIGITAL EXTENDED LOOP WITH DEDICATED DS1 INTEROFFICE TRANSPORT						
P.11-1 Fixed						
Zone 1	$160.09				$161.88	
Zone 2	$186.76				$187.57	
Zone 3	$272.25				$279.95	
P.17.1 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Combination Switch-As-Is- Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-wire DS1 Digital Extended Loop with Dedicated DS1 Interoffice Transport - NEW		$353.62	$220.07		$392.21	$244.08
Nonrec. Cost - 4-wire DS1 Digital Extd. Loop with Ded. DS1 Interoffice Transp. - NEW - Disc. Only		$87.50	$29.21		$97.05	$32.40
P.11-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.13 4-WIRE DS1 DIGITAL EXTENDED LOOP WITH DEDICATED DS3 INTEROFFICE TRANSPORT						
P.13-1 First DS1 in DS3						
Zone 1	$1,403.16			$1,369.39		
Zone 2	$1,429.83			$1,395.08		
Zone 3	$1,515.32			$1,487.46		
P.17.1 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Combination Switch-As-Is- Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-wire DS1 Digital Extd. Loop with Ded. DS3 Interoffice Transport- New		$595.00	$289.60		$659.96	$321.20

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
Nonrec. Cost - 4-wire DS1 Digital Extd. Loop with Ded. DS3 Interoffice Transport- New - Disc. Only		$92.14	$33.83		$102.20	$37.52
P.13-2 D.6.1 Interoffice Transport - Dedicated - DS3 - Per Mile	3.57				$3.87	
P.13-3 Additional DS1 in same DS3						
Zone 1	$83.46				$87.20	
Zone 2	$110.13				$112.89	
Zone 3	$195.62				$205.27	
P.17.16 Nonrecurring Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.15 4-WIRE DS1 DIGITAL LOOP WITH DDITS PORT						
4-Wire DS1 Digital Loop with DDITS Port - switch-as-is						
Zone 1	$121.95				$128.39	
Zone 2	$148.62				$154.08	
Zone 3	$234.11				$246.46	
P.15.3 4-wire DS1 Digital Loop / DDITS Trunk Port Combination - Nonrecurring Costs - Switch-as-is		$71.29	$42.11		$95.31	$46.71
P.15.5 4-Wire DS1 Dig. Loop / DDITS Trunk Port Comb. -Subsequent Channel Activation - Per Channel		$14.14			$15.69	
P.16 2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE PORT						
P.16-1 Fixed - Switch-as-is						
Zone 1	$40.79				$41.22	
Zone 2	$45.96				$46.29	
Zone 3	$62.54				$64.54	
P.16.2 D.2.1 Interoffice Transport - Dedicated - 2 W VG per mile	$0.0084				$0.0091	
P.16.3 2W VG Loop / 2W VG IO Transport / 2W Port Combination - Nonrecurring Costs - Switch-as-is		$8.14	$1.69		$9.03	$1.87
P.17 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination						

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.17.1 Nonrecurring Cost for Extended Loop or Local Channel and Interoffice Combination Switch -As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extended Loop or Local Channel and Interoffice Comb. Switch -As-Is - Disc. Only		$8.10	$8.10		$8.98	$8.98
P.17.4 Nonrecurring Cost - New DS1 Interoffice Facility for Combination Use Only		$157.30	$110.42		$174.46	$122.46
P.17.4 Nonrecurring Cost - New DS1 Interoffice Facility for Combination Use Only - Disconnect Only		$41.12	$16.18		$45.61	$17.95
P.17.5 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1/0 MUXing for Combination Use Only		$208.93	$123.71		$231.74	$137.20
P.17.5 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MUXing for Comb. Use Only - Disc. Only		$42.47	$17.39		$47.11	$19.29
P.17.7 Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility for Combination Use Only		$288.50	$124.61		$320.00	$138.20
P.17.7 Nonrec. Cost - New DS3 or STS-1 Interoffice Facility for Combination Use Only - Disconnect Only		$34.80	$16.96		$38.60	$18.81
P.17.8 Nonrecurring Cost - New DS3 or STS-1 w/ 3/1 MUXing Interoffice Facility for Combination Use Only		$392.63	$175.59		$435.60	$194.74
P.17.8 Nonrec. Cost - New DS3 or STS-1 w/ 3/1 MUXing Interoffice Fac. for Comb. Use Only - Disc. Only		$45.76	$20.80		$50.76	$23.07
P.17.10 Nonrecurring Cost - New VG Local Loop for Combination Use Only		$115.02	$54.58		$127.59	$60.54
P.17.10 Nonrecurring Cost - New VG Local Loop for Combination Use Only - Disconnect Only		$43.28	$5.68		$48.00	$6.31
P.17.11 Nonrecurring Cost - New DS1 Local Loop for Combination Use Only		$196.32	$109.65		$217.75	$121.62
P.17.11 Nonrecurring Cost - New DS1 Local Loop for Combination Use Only Disconnect Only		$46.38	$13.03		$51.44	$14.45
P.17.12 Nonrecurring Cost - New DS3 or STS-1 Local Loop for Combination Use Only		$220.36	$139.50		$244.42	$154.73
P.17.12 Nonrecurring Cost - New DS3 or STS-1 Local Loop for Combination Use Only - Disconnect Only		$60.49	$23.69		$67.10	$26.27
P.17 16 Nonrecurring Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.17.17 Nonrecurring Cost - New DS0 IOF for Combination Use Only		$85.38	$47.42		$94.70	$52.59

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.17.17 Nonrecurring Cost - New DS0 IOF for Combination Use Only - Disconnect Only		$40.82	$16.25		$45.28	$18.03
P.23 2-WIRE VOICE GRADE EXTENDED LOOP/2 WIRE VOICE GRADE INTEROFFICE TRANSPORT						
P.23-1 Fixed						
Zone 1	$39.45			$39.82		
Zone 2	$44.62			$44.89		
Zone 3	$61.20			$63.14		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is - Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 2-wire VG Extended Loop with 2-wire VG Interoffice Transport - NEW		$200.40	$102.00		$222.29	$113.13
Nonrec. Cost - 2-wire VG Extd. Loop with 2-wire VG Interoffice Transport - NEW - Disc. Only		$84.10	$21.93		$93.28	$24.34
P.23-2 D.2.1 Interoffice Transport - Dedicate - 2-Wire Voice Grade - Per Mile	$0.0084			$0.0091		
P.24 4-WIRE VOICE GRADE EXTENDED LOOP/ 4-WIRE VOICE GRADE INTEROFFICE TRANSPORT						
P.24-1 Fixed						
Zone 1	$44.43			$45.60		
Zone 2	$52.61			$53.65		
Zone 3	$78.83			$82.60		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is - Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-wire VG Extended Loop with 4-wire VG Interoffice Transport - NEW		$200.40	$102.00		$222.29	$113.13
Nonrec. Cost - 4-wire VG Extd. Loop with 4-wire VG Interoffice Transport - NEW - Disc. Only		$84.10	$21.93		$93.28	$24.34

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.24-2 D.12.1 Interoffice Transport - Dedicated - 4-Wire Voice Grade - Per Mile	$0.0084			$0.0091		
P.25 DS3 DIGITAL EXTENDED LOOP WITH DEDICATED STS1 INTEROFFICE TRANSPORT						
P.25-1 Fixed	$1,488.10			$1,457.88		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is - Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - DS3 Digital Extd. Loop with Ded. DS3 Interoffice Transport - NEW		$508.86	$264.11		$564.42	$292.93
Nonrec. Cost - DS3 Digital Extd. Loop with Ded. DS3 Interoffice Transport - NEW - Disc. Only		$95.29	$40.65		$105.70	$45.08
P.25-2 D.6.1 Interoffice Transport - Dedicated - DS3 - Per Mile	$3.57			$3.87		
P.25-3 A.16.2 High Capacity Unbundled Local Loop - DS3 - Per Mile	$10.06			$10.92		
P.26 STS1 DIGITAL EXTENDED LOOP WITH DEDICATED STS1 INTEROFFICE TRANSPORT						
P.26-1 Fixed	$1,511.68			$1,482.60		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-As-Is - Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - STS1 Digital Extd. Loop with Ded. STS1 Interoffice Transport - NEW		$508.86	$264.11		$564.42	$292.93
Nonrec. Cost - STS1 Digital Extd. Loop with Ded. STS1 Interoffice Transport - NEW - Disc. Only		$95.29	$40.65		$105.70	$45.08
P.26-2 D.10.1 Interoffice Transport - Dedicated - STS-1 - Per Mile	$3.57			$3.87		
P.26-3 Per Mile - Loop						

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	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
ELEMENT NUMBER & DESCRIPTION	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
A.16.16 High Capacity Unbundled Local Loop - STS-1 - Per Mile	$10.06			$10.92		
P.50 4-WIRE DS1 LOOP WITH CHANNELIZATION WITH PORT						
P.50.VG1 First Voice Grade in DS1 - Switch-as-is						
Zone 1	$192.53			$193.54		
Zone 2	$219.19			$219.23		
Zone 3	$304.69			$311.61		
P.50.VG2 Additional Voice Grade in same DS1	$2.00			$2.04		
P.50 DID1 First 2-Wire DID in DS1 -Switch-as-is						
Zone 1	$200.00			$200.87		
Zone 2	$226.66			$226.56		
Zone 3	$312.16			$318.94		
P50DID2 Additional 2-Wire DID in same DS1	$9.47			$9.37		
P50ISDN-1 First ISDN in DS1 - Switch-as-is						
Zone 1	$201.99			$203.25		
Zone 2	$228.66			$228.94		
Zone 3	$314.15			$321.32		
P50ISDN2 Additional ISDN in same DS1	$11.46			$11.75		
P.50.1 4-Wire DS1 Loop/Channelization Port Combination - Nonrecurring Costs - Switch-as-is		$72.61	$3.82		$96.77	$4.24
P.50.4 4-Wire DS1 Loop/Channelization Port Combination - Subsequent Activity - Add Lines - Per Line		$56.95			$63.17	
P.50.5 4-Wire DS1 Loop/Channelization Port Combination - Subsequent Activity - Add Trunks - Per Trunk		$78.32			$86.86	
P.51 2-WIRE ISDN EXTENDED LOOP WITH DS1 INTEROFFICE TRANSPORT						
P.51-1 First 2-Wire ISDN in DS1						
Zone 1	$266.81			$260.63		
Zone 2	$274.68			$268.25		
Zone 3	$299.93			$295.63		

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is -Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 2-Wire ISDN Extd. Loop with DS1 Interoffice Transport - NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost - 2-Wire ISDN Extd. Loop with DS1 Interoffice Transport - NEW - Disc. Only		$85.75	$23.07		$95.11	$25.60
P.51-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.51-3 Additional 2-Wire ISDN in same DS1						
Zone 1	$24.20			$25.42		
Zone 2	$32.07			$32.04		
Zone 3	$57.32			$60.42		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.52 4-WIRE DS1 DIGITAL EXTENDED LOOP WITH DEDICATED STS-1 INTEROFFICE TRANSPORT						
P.52-1 First in DS1 in STS1						
Zone 1	$1,387.16			$1,354.39		
Zone 2	$1,413.83			$1,380.08		
Zone 3	$1,499.32			$1,472.46		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is -Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-Wire DS1 Digital Extd. Loop with Ded. STS-1 Interoffice Transport - NEW		$490.87	$238.62		$544.46	$264.66
Nonrec. Cost - 4-Wire DS1 Digital Extd. Loop with Ded. STS-1 Interoffice Transport - NEW - Disc. Only		$81.18	$29.99		$90.04	$33.26
P.52-2 D.10.1 Interoffice Transport- Dedicated - STS-1 - Per Mile	$3.57			$3.87		

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.52-3 Additional DS1 in same STS1						
Zone 1	$83.46				$87.20	
Zone 2	$110.13				$112.89	
Zone 3	$195.62				$205.27	
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.53 2-WIRE VOICE GRADE EXTD LOOP WITH DED DS1 INTEROFFICE TRANSPORT W/ 3/1 MUX						
P.53-1 First 2-Wire VG in First DS1 in DS3						
Zone 1	$490.40				$476.04	
Zone 2	$495.57				$481.11	
Zone 3	$512.15				$499.36	
P.17.1 Nonrec. Cost for Extd. Loop of Local Channel and Interoffice Combination - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop of Local Channel and Interoffice Comb. - Switch-as-is-Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 2-Wire VG Extd. Loop with Ded. DS1 Interoffice Transport with 3/1 Mux- NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost - 2-Wire VG Extd. Loop with Ded. DS1 Interoffice Trans. with 3/1 Mux- NEW-Disc Only		$85.75	$23.07		$95.11	$25.60
P.53-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.53-3 Additional 2-Wire VG in same DS1						
Zone 1	$14.85				$15.88	
Zone 2	$20.02				$20.95	
Zone 3	$36.60				$39.20	
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84

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	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.53-4 Additional DS1 in same DS3	$256.85			$248.97		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.54 4-WIRE VOICE GRADE EXTENDED LOOP WITH DS1 INTEROFFICE TRANSPORT W/ 3/1 MUX						
P.54-1 First 4-Wire VG in First DS1 in DS3						
Zone 1	$498.20			$484.56		
Zone 2	$506.38			$492.61		
Zone 3	$532.60			$521.56		
P.17.1 Nonrec. Cost for Extd. Loop of Local Channel and Interoffice Combination - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop of Local Channel and Interoffice Comb. - Switch-as-is-Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-Wire VG Extd. Loop with Ded. DS1 Interoffice Trans. with 3/1 Mux - NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost - 4-Wire VG Extd. Loop with Ded. DS1 Interoffice Trans. with 3/1 Mux - NEW - Disc Only		$85.75	$23.07		$95.11	$25.60
P.54-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.54-3 Additional 4-Wire VG in same DS1						
Zone 1	$22.65			$24.40		
Zone 2	$30.83			$32.45		
Zone 3	$57.05			$61.40		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.54-4 Additional DS1 in same DS3	$256.85			$248.97		

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ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.55 4-WIRE 56 OR 64 KBPS EXTD DIGITAL LOOP WITH DED. DS1 INTEROFFICE TRANS. W/ 3/1 MUX						
P.55-1 First 4-Wire in First DS1 in DS3						
Zone 1	$502.19			$488.65		
Zone 2	$511.62			$497.88		
Zone 3	$541.82			$531.08		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is -Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost- 4-Wire 56 or 64 Kbps Extd Loop w/Ded. DS1 Trans. w/ 3/1 Mux- NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost- 4-Wire 56 or 64 Kbps Extd Loop w/Ded. DS1 Trans. w/ 3/1 Mux- NEW - Disc. Only		$85.75	$23.07		$95.11	$25.60
P.55-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.55-3 Additional 4-Wire in same DS1						
Zone 1	$26.64			$28.49		
Zone 2	$36.07			$37.72		
Zone 3	$66.30			$70.92		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.55-4 Additional DS1 in same DS3	$256.85				$248.97	
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.56 2-WIRE ISDN EXTENDED LOOP WITH DS1 INTEROFFICE TRANSPORT W/ 3/1MUX						

APPENDIX A

ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.56-1 First 2-Wire in First DS3						
Zone 1	$499.75			$485.58		
Zone 2	$507.62			$493.20		
Zone 3	$532.87			$520.58		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is -Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 2-Wire ISDN Extd Loop with Ded. DS1 Interoffice Transport with 3/1 Mux - NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost - 2-Wire ISDN Extd Loop w/ Ded. DS1 Interoffice Trans. w/ 3/1 Mux - NEW - Disc. Only		$85.75	$23.07		$95.11	$25.60
P.56-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.56-3 Additional 2-Wire in same DS1						
Zone 1	$24.20			$25.42		
Zone 2	$32.07			$33.04		
Zone 3	$57.32			$60.42		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P 56-4 Additional DS1 in same DS3	$256.85			$248.97		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.57 4-WIRE DS1 DIGITAL EXTD LOOP WITH DED. DS1 INTEROFFICE TRANSPORT W/ 3/1/ MUX						
P.57-1 First 4-Wire DS1 in DS3						
Zone 1	$393.03			$386.83		
Zone 2	$419.70			$412.52		
Zone 3	$505.19			$504.90		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is		$8.10	$8.10		$8.98	$8.98

APPENDIX A

ELEMENT NUMBER & DESCRIPTION	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is - Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost - 4-Wire DS1 Digital Extd. Loop with Ded. DS1 Interoffice Transport with 3/1 Mux - NEW		$330.00	$182.65		$366.04	$202.58
Nonrec. Cost- 4-Wire DS1 Dig Extd. Loop with Ded DS1 Interoffice Trans. w/ 3/1 Mux-NEW -Disc Only		$85.75	$23.07		$95.11	$25.60
P.57-2 D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile	$0.1710			$0.1856		
P.57-3 Additional 4-Wire DS1 in same DS3						
Zone 1	$174.33			$175.64		
Zone 2	$201.00			$201.33		
Zone 3	$286.49			$293.71		
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only		$6.05	$4.36		$6.71	$4.84
P.58 4-WIRE 56 OR 64 KBPS DIGITAL EXTENDED LOOP WITH DS0 INTEROFFICE TRANSPORT						
P.58-1 Fixed						
Zone 1	$43.43			$44.83		
Zone 2	$52.86			$54.06		
Zone 3	$83.09			$87.26		
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is		$8.10	$8.10		$8.98	$8.98
P.17.1 Nonrec. Cost for Extd. Loop or Local Channel and Interoffice Comb. - Switch-as-is -Disc. Only		$8.10	$8.10		$8.98	$8.98
Nonrec. Cost- 4-Wire 56 or 64 Kbps Dig. Extd Loop w/ Ded DS0 Interoffice Transport - NEW		$200.40	$102.00		$222.29	$113.13
Nonrec. Cost- 4-Wire 56 or 64 Kbps Dig. Extd Loop w/ Ded DS0 Interoffice Trans - NEW- Disc. Only		$84.10	$21.93		$93.28	$24.34
P.58-2 D.3.1 Interoffice Transport - Dedicate -DS0 - Per Mile	$0.0084			$0.0091		

APPENDIX A						
	COMMISSION-APPROVED RATES			RECOMMENDED RATES - RECONSIDERATION		
ELEMENT NUMBER & DESCRIPTION	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)	RECURRING	NON-RECURRING Including First	NON-RECURRING ADDITIONAL (If Different)
Q.0 D4 CHANNEL BANKS						
Q.1 D4 CHANNEL BANKS CENTRAL OFFICE						
Q.1.1 D4 Channel Bank Inside CO - System						
Q.1.3 Unbundled Loop Concentration - ISDN (Brite Card)						
Q.1.4 Unbundled Loop Concentration - POTS Card						

APPENDIX B - BELLSOUTH WIRE CENTERS BY ZONES

Zone 1

BCRTFLBT	FTLDFLSG	KYWSFLMA	MIAMFLGR	MIAMFLWM
BCRTFLMA	FTLDFLSU	MIAMFLAE	MIAMFLIC	MNDRFLAV
CCBHFLMA	HLWDFLHA	MIAMFLAL	MIAMFLKE	NDADFLAC
DLBHFLMA	HLWDFLMA	MIAMFLAP	MIAMFLME	NDADFLOL
DYBHFLFN	JCVLFLCL	MIAMFLBA	MIAMFLNM	NKLRFLMA
FTLDFLCR	JCVLFLIA	MIAMFLBC	MIAMFLPB	ORLDFLMA
FTLDFLCY	JCVLFLJT	MIAMFLBR	MIAMFLPL	PMBHFLTA
FTLDFLMR	JCVLFLSJ	MIAMFLDB	MIAMFLSO	WPBHFLAN
FTLDFLOA	JCVLFLSM	MIAMFLFL	MIAMFLWD	

Zone 2

BCRTFLSA	FTLDFLJA	JCVLFLNO	NSBHFLMA	PNSCFLWA
BKVLFLJF	FTLDFLPL	JCVLFLOW	ORLDFLAP	PNVDFLMA
BLGLFLMA	FTLDFLWN	JCVLFLRV	ORLDFLCL	PRRNFLMA
BYBHFLMA	FTPRFLMA	JCVLFLWC	ORLDFLPC	PTSLFLMA
CNTMFLLE	GLBRFLMC	JPTRFLMA	ORLDFLPH	PTSLFLSO
COCOFLMA	GSVLFLMA	KYLRFLLS	ORLDFLSA	SBSTFLMA
COCOFLME	GSVLFLNW	KYLRFLMA	ORPKFLMA	SNFRFLMA
DBRYFLDL	HBSDFLMA	LKMRFLMA	ORPKFLRW,	STAGFLBS
DBRYFLMA	HLNVFLMA	LYHNFLOH	OVIDFLCA	STAGFLMA
DELDFLMA	HLWDFLPE	MIAMFLCA	PACEFLPV	STAGFLSH
DLBHFLKP	HLWDFLWH	MIAMFLHL	PAHKFLMA	STRTFLMA
DLSPFLMA	HMSTFLAF	MIAMFLNS	PCBHFLNT	TTVLFLMA
DRBHFLMA	HMSTFLHM	MIAMFLOL	PLCSFLMA	VRBHFLBE
DYBHFLMA	HTISFLMA	MIAMFLRR	PMBHFLCS	VRBHFLMA
DYBHFLOB	ISLMFLMA	MIAMFLSH	PMBHFLFE	WPBHFLGA
DYBHFLOS	JCBHFLAB	MICCFLBB	PMBHFLMA	WPBHFLGR
DYBHFLPO	JCBHFLMA	MLBRFLMA	PNCYFLCA	WPBHFLHH
EGLLFLBG	JCBHFLSP	MNDRFLLO	PNCYFLMA	WPBHFLLE
EGLLFLIH	JCVLFLAR	MNDRFLLW	PNSCFLBL	WPBHFLRB
FLBHFLMA	JCVLFLBW	MRTHFLVE	PNSCFLFP	WPBHFLRP
FRBHFLFP	JCVLFLFC	NDADFLBR	PNSCFLHC	WWSPFLHI
FTLDFLAP	JCVLFLLF	NDADFLGG	PNSCFLPB	WWSPFLSH

Zone 3

ARCHFLMA	DNLNFLWM	JAY-FLMA	OKHLFLMA	TRENFLMA
BGPIFLMA	EORNFLMA	KYHGFLMA	OLTWFLLN	VERNFLMA
BLDWFLMA	FTGRFLMA	LKCYFLMA	PLTKFLMA	WELKFLMA
BNNLFLMA	GCSPFLCN	MCNPFLMA	PMPKFLMA	YNFNFLMA
BRSNFLMA	GCVLFLMA	MDBGFLPM	PRSNFLFD	YNTWFLMA
CDKYFLMA	GENVFLMA	MLTNFLRA	SBSTFLFE	YULEFLMA
CFLDFLMA	HAVNFLMA	MNSNFLMA	SGKYFLMA	
CHPLFLJA	HMSTFLEA	MXVLFLMA	STAGFLWG	
CSCYFLBA	HWTHFLMA	NWBYFLMA	SYHSFLCC	