

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649A-TP
Request for Confidential Classification
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1/18/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REBUTTAL
TESTIMONY OF JOHN C. DONOVAN EXHIBITS JCD-2, JCD-4 AND JCD-5
AS FILED ON DECEMBER 10, 2001 IN FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 990649A-TP**

2 Redacted Copies for Public Disclosure

DOCUMENT NUMBER-DATE

00702 JAN 18 02

FPSC-COMMISSION CLERK

Miscellaneous

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	Miscellaneous			K
																																																		Orig	CWI	TOTAL DOLLARS	
Order	1	CWI	Description	Sec	Title	CostCode	CountCode	State	FLTotal	FLUsage	FLPrice																																										
552	E108A		1 TON TRUCK - LC	10	"B" Equip	Misc						BellSouth notes all of these line items with, "Distribute to all items." This is an obvious attempt at a "Closure Factor" to load up costs with non-TELRIC miscellaneous embedded costs that have no direct correlation with infrastructure construction, and may likely be used for maintenance and other operations not part of investments.																																									
494	E001A		1 TON TRUCK OR LESS	10	"B" Equip	Misc																																															
495	E004A		1-1/2 TO 2 TON TRUCK	10	"B" Equip	Misc																																															
499	E012A		2 TO 3" WATER PUMP	10	"B" Equip	Misc																																															
496	E006A		2 TON < TRUCK W/WINCH	10	"B" Equip	Misc																																															
548	E101A		2 TON TRUCK - LC	10	"B" Equip	Misc																																															
500	E014A		4" WATER PUMP	10	"B" Equip	Misc																																															
501	E016A		6" WATER PUMP	10	"B" Equip	Misc																																															
498	E010A		AIR COMPRESSOR	10	"B" Equip	Misc																																															
514	E042A		ASP/CONCRETE SAW	10	"B" Equip	Misc																																															
538	E088A		ASPHALT ROLLER	10	"B" Equip	Misc																																															
507	E028A		BACKHOE RUBBER	10	"B" Equip	Misc																																															
522	E056A		BLOWER	10	"B" Equip	Misc																																															
504	E022A		BORING MACHINE	10	"B" Equip	Misc																																															
505	E024A		BULLDOZER	10	"B" Equip	Misc																																															
549	E102A		BUSH CHIPPER - LC	10	"B" Equip	Misc																																															
518	E050A		CABLE PLOW	10	"B" Equip	Misc																																															
524	E060A		CHAIN SAW	10	"B" Equip	Misc																																															
491	L012B		CLIMBER HELPER	9	"B" Labor	Misc																																															
490	L012A		CLIMBER HELPER	9	"B" Labor	Misc																																															
489	L010B		CLIMBER/WKING LDER	9	"B" Labor	Misc																																															
488	L010A		CLIMBER/WKING LDER	9	"B" Labor	Misc																																															
537	E086A		CONCRETE BARRIER	10	"B" Equip	Misc																																															
517	E048A		CRAWLER BACKHOE	10	"B" Equip	Misc																																															
534	E079A		DIRECT BORING MACHINE	10	"B" Equip	Misc																																															
527	E066A		DUCT RODS/SET	10	"B" Equip	Misc																																															
519	E052A		DUMP UP TO 2-1/2 TON	10	"B" Equip	Misc																																															
526	E064A		ELEC SAW/DRILL	10	"B" Equip	Misc																																															
528	E068A		ELECTRIC HAMMER	10	"B" Equip	Misc																																															
486	L004A		FLAGGER	9	"B" Labor	Misc																																															
493	L014B		FLAGGER TREE TRIM	9	"B" Labor	Misc																																															
492	L014A		FLAGGER TREE TRIM	9	"B" Labor	Misc																																															
487	L004B		FLAGMAN	9	"B" Labor	Misc																																															
520	E054A		FORK LIFT	10	"B" Equip	Misc																																															
482	L001B		FRM/OPER/WKING LDER	9	"B" Labor	Misc																																															
481	L001A		FRM/OPER/WKING LDER	9	"B" Labor	Misc																																															
515	E044A		FRONT END LOADER	10	"B" Equip	Misc																																															
513	E040A		GENERATOR > 2000W	10	"B" Equip	Misc																																															
512	E038A		GENERATOR 2000W <	10	"B" Equip	Misc																																															
532	E076A		HIGH INTENSITY LIGHT	10	"B" Equip	Misc																																															
531	E074A		HIGHWAY SIGNAL	10	"B" Equip	Misc																																															
525	E062A		HOE RAM ATTACH	10	"B" Equip	Misc																																															
550	E104A		HYD DUMP TRUCK - LC	10	"B" Equip	Misc																																															
509	E032A		HYD POLE TRUCK	10	"B" Equip	Misc																																															
484	L002B		LABORER	9	"B" Labor	Misc																																															
483	L002A		LABORER	9	"B" Labor	Misc																																															
516	E046A		MANTA RAY ANCHOR	10	"B" Equip	Misc																																															

Note: Line items with zero cost and zero quantity have been removed by AT10:43 AM and WorldCom for clarity.

Contains Information Alleged by BellSouth to be Proprietary

305 57744911: # 3

: MESSER CAPARELLO & S - 1-16-02 : 10:20

SENT BY: 8504251942

Miscellaneous

1	A	B	C	D	E	F	G	H	I	J	K
2	Orig	CWI	TOTAL DOLLARS TABLE - OSPCM DATA	Usage	time	Price					
3	Order		State				State	FL	FL	FL	
4	1	CW	Description	Sec	Title	CostCode	CountCode	FLTotal	FLUsage	FLPrice	Notes
5	508	E030A	MINI BACKHOE	10	"B" Equip	Misc					
6	546	E097A	None	10	"B" Mach	Misc					
7	547	E097B	None	10	"B" Mach	Misc					
8	543	E094A	PLATE SPLICE PIT	10	"B" Equip	Misc					
9	502	E018A	POLE/CA TRAILER	10	"B" Equip	Misc					
10	485	L003A	POLICE OFFICER	9	"B" Labor	Misc					
11	497	E008A	RD TRACTOR W/SEMI TRAILER	10	"B" Equip	Misc					
12	541	E092A	SAFETY LIGHT	10	"B" Equip	Misc					
13	544	E096A	SHORE PIT 80 CUFT OR <	10	"B" Equip	Misc					
14	545	E096B	SHORE PIT ADD 25 CUFT	10	"B" Equip	Misc					
15	539	E090A	SPLICE PIT PROTECTION	10	"B" Equip	Misc					
16	540	E090B	SPLICE PIT PROTECTION ADD	10	"B" Equip	Misc					
17	553	E110A	STUMP GRINDER - LC	10	"B" Equip	Misc					
18	510	E034A	TAMPER	10	"B" Equip	Misc					
19	503	E020A	TRENCHER	10	"B" Equip	Misc					
20	535	E080A	WELL POINT 20 OR <	10	"B" Equip	Misc					
21	536	E082A	WELL POINT ADD PT	10	"B" Equip	Misc					

Note: Line items with zero cost and zero quantity have been removed by AT10:43 AM and WorldCom for clarity.

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	A	B	C	D	E	F	G	H	I
1	Underground Contract Labor								
2	[REDACTED]								
3	Duct	CU							
4	Duct	FO							This value includes Contractor material.
5	Inner Duct	1"							This value includes Contractor material.
6	Inner Duct	1.25"							
7	Manholes		1						Contract Labor Installation cost of one vault/manhole that accommodates three or four cables. This is the minimum size manhole available.
8	Manholes		2						Contract Labor Installation cost of one vault/manhole that accommodates three or four cables. This is the minimum size manhole available.
9	Manholes		3						Contract Labor Installation cost of one vault/manhole that accommodates three or four cables. This is the minimum size manhole available.
10	Manholes		5						Contract Labor Installation cost of one vault/manhole that accommodates five cables.

305 5774491:# 5

1-16-02 : 10:22 :MESSER CAPARELLO & S-

SENT BY: 8504251942

Analysis of BellSouth Copper Cable Splicing Rates

	A	B	C	D	E	F	G	H	I	
1	Copper Cable Placing Rate to place 100 feet of cable					Copper Cable Splicing Rate to splice one 100-pair cable				
2										
3		Underground	Buried	Aerial			Underground	Buried	Aerial	
4	Crew Size	2	1	1		Crew Size	2	1	1	
5	Setup Clock Hours	1.00	1.00	1.00		Setup Clock Hours	2.00	1.75	2.00	
6	Setup Timesheet Hours	2.00	1.00	1.00		Setup Timesheet Hours	4.00	1.75	2.00	
7										
8	BellSouth Placing Labor per 100 ft.					BellSouth Splicing Labor per 100 pairs				
9										
10	Time for placing cable sheath	0.25	0.25	0.25		Time for wirework (hrs.)	1.32	1.32	1.32	
11	Placing Rate (sheath ft./day)					Splicing Rate (pairs/hour)				
12										
13										
14										
15	Copper Cable Placing Rate to place 200 feet of cable					Copper Cable Splicing Rate to splice one 200-pair cable				
16										
17		Underground	Buried	Aerial			Underground	Buried	Aerial	
18	Crew Size	2	1	1		Crew Size	2	1	1	
19	Setup Clock Hours	1.00	1.00	1.00		Setup Clock Hours	4.00	3.50	4.00	
20	Setup Timesheet Hours	2.00	1.00	1.00		Setup Timesheet Hours	8.00	3.50	4.00	
21										
22	BellSouth Placing Labor per 100 ft.					BellSouth Splicing Labor per 200 pairs				
23										
24	Time for placing cable sheath	1.50	1.50	1.50		Time for wirework (hrs.)	2.64	2.64	2.64	
25										
26	Placing Rate (sheath ft./day)					Splicing Rate (pairs/hour)				
27										
28										
29	Copper Cable Placing Rate to place 640 feet of cable					Copper Cable Splicing Rate to splice one 4200-pair cable				
30										
31		Underground	Buried	Aerial			Underground	Buried	Aerial	
32	Crew Size	2	1	1		Crew Size	2	1	1	
33	Setup Clock Hours	1.00	1.00	1.00		Setup Clock Hours	84.00	73.50	84.00	
34	Setup Timesheet Hours	2.00	1.00	1.00		Setup Timesheet Hours	168.00	73.50	84.00	
35										
36	BellSouth Placing Labor per 100 ft.					BellSouth Splicing Labor per 200 pairs				
37										
38	Time for placing cable sheath	7.00	7.00	7.00		Time for wirework (hrs.)	55.44	55.44	55.44	
39										
40	Placing Rate (sheath ft./day)					Splicing Rate (pairs/hour)				

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