EXHIBIT NO. _____

DOCKET NO.: 990649A-TP

WITNESS: Conf. Stip-16

PARTY: AT&T/MCI

DESCRIPTION:

1. **00986-02 - Confidential Responses to Staff's 2nd Interrogatories, Item 13, and Staff's Second Request for Production of Documents Items 4, 5, 6, and 15 (15 is a CD-ROM)**

CD-ROM is in original document

RMK 1.27.03

~~CONFIDENTIAL~~

PROFFERING PARTY: STAFF

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET 990649-A EXHIBIT NO. 16
FPSC Staff
3-11&12-02

I.D. # Conf. Stip-16

(DN 00986-02)

DECLASSIFIED 1.27.03

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND MCI WORLDCOM, INC.'S JOINT RESPONSES TO FPSC STAFF'S SECOND SET OF INTERROGATORIES

AT&T Communications of the Southern States, Inc. ("AT&T") and MCI WorldCom, Inc. ("MCI"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.350 and 1.280, Florida Rules of Civil Procedure, hereby submit the following Responses to FPSC Staff's Second Set of Interrogatories to AT&T and MCI.

INTERROGATORY NO. 11: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Darnell, page 18, lines 12-17.**

INTERROGATORY NO. 11(a): **Please identify the "portion" of the remote terminal that BellSouth seeks to recover through the DSLAM rate element. Please identify the amount in question, and identify where this amount is located in BellSouth's cost study documentation.**

AT&T/MCI's Response: The portion of the remote terminal that BellSouth seeks to recover through the DSLAM rate element is considered a proprietary number by BellSouth. However, this amount can be found on BellSouth cost support file, DSLAM.xls, INPUT_Monthly worksheet, line 27, column E.

INTERROGATORY NO. 11(b): **Please identify in which rate element(s), if any, the cost of a remote terminal housing should be recovered.**

AT&T/MCI's Response: The cost of remote terminal house should and is recovered through the UNE loop rates as a result of calculations made by BSTLM-SC.

INTERROGATORY NO. 12: For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 13, lines 3-6. Please identify the "knowledgeable parties" (and the individuals, if known) who advocated that engineering cost correlates best to linear sheath feet of cable.

AT&T/MCI's Response: Mr. Donovan was closely involved in working with the FCC Staff during the Inputs Process referred to in the cited testimony, and recalls that a couple of telephone company representatives expressed the opinion that outside plant engineering cost most directly correlated with sheath feet of cable placed, regardless of the size of the cable. He believes, at a minimum, those parties included Sprint and Ameritech. At page 13 of his rebuttal testimony, Mr. Donovan includes an FCC reference to Sprint's position advocating engineering cost per sheath foot of cable. The original FCC document attributes Sprint's comments to "Sprint *Inputs Further Notice* comments at 24." We do not have a copy of Sprint's original comments referenced by the FCC's footnotes. However, a February 8, 1999 ex parte letter from Mr. Pete Sywenki of Sprint to Ms. Magalie Roman Salas of the FCC states the following:

> **Engineering Labor**: While there is some impact to engineering labor based on the size of a copper cable, Sprint would support an allocation of Engineering labor based on sheath feet of cable placed.

INTERROGATORY NO. 13: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 15, lines 8-10. Please identify specifically where in BellSouth documentation these two values occur, and where their derivations are shown.**

AT&T/MCI's Response: The BellSouth-Florida factors of 35.72% for fiber cable and 27.07% for all other outside plant items such as copper cable and structures may be found in BST-FL Investlogic.xls spreadsheet under Labor Rates & Loadings.

As stated in Mr. Donovan's rebuttal testimony, we have been unable to identify any BellSouth justification or derivations of the engineering factors.

INTERROGATORY NO. 14: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 14, lines 5-7.**

INTERROGATORY NO. 14(a): **Other than the percentage used, is this the same approach used by BellSouth to estimate engineering costs in the BSTLM-SC?**

AT&T/MCI's Response: Yes. As stated in the cited lines, the FCC concluded that engineering costs at 10% of **material** and **labor** cost of cable is reasonable. BellSouth applies a percent engineering loading factor to Material, **Material Loading**, and **Labor**. Therefore the approach is equivalent.

INTERROGATORY NO. 14(b): **If the response to (a) is negative, please explain the differences between the approach used in the BSTLM-SC and that adopted by the FCC for non-rural carriers in the Universal Service docket.**

AT&T/MCI's Response: As indicated above, the approach is the same.

INTERROGATORY NO. 15: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 21, lines 1-4.**

INTERROGATORY NO. 15(a): **Does BellSouth actually use nine types of excavation in the BSTLM-SC?**

AT&T/MCI's Response: There is a typographical error on line 1 of page 21 in Mr. Donovan's rebuttal testimony; the word "seven" should read "nine". The corrected sentence should read as follows:

> Of the **nine** types of excavation that BellSouth uses in BSTLM (e.g., types 4 through 12), BellSouth combines seven of them together as equal cost items and only distinguishes higher costs for Bore Buried Cable and Push Pipe/Pull Cable.

INTERROGATORY NO. 15(b): **If the response to (a) is negative, please identify specifically where in the BSTLM-SC that only seven types are used.**

AT&T/MCI's Response: As indicated above, the correct number should be nine, not seven.

INTERROGATORY NO. 16: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 25, lines 4-11.**

INTERROGATORY NO. 16(a): **Please define or otherwise describe "splice pit."**

AT&T/MCI's Response: A "splice pit" is a simple hole in the ground, normally approximately 4 ft. x 4 ft. x 4 ft.

INTERROGATORY NO. 16(b): Please identify all documents and work papers that support the assertion that the costs for splice pits are accounted for in the Exempt Material Loading Factor.

AT&T/MCI's Response: There is no material associated with splice pits, as they are simply holes in the ground to allow access to a buried cable. Mr. Donovan's cited testimony indicates that the cost for above ground pedestal closures are included in the Exempt Material Loading Factor, and BellSouth's witness Ms. Caldwell agrees. In her December 26, 2001 surrebuttal testimony, she states at page 19:

> While the pedestal material would be captured through the Miscellaneous Material loading (i.e., the exempt material is calculated), the labor associated with placing the pedestal is not currently reflected in the model.

It should be noted that since the pedestal would be used as a splice closure, the costs of installing such a splice closure, whether it is a splice case or a metal box closure, is included in the setup/close down and closure time (which Mr. Donovan recommends as 1.75 hours) as part of the buried splicing operation.

INTERROGATORY NO. 17: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 29, lines 8-12. To the extent not shown in Exhibit JCD-8, please identify the specific inputs to BSTLM-SC required to implement your recommendation, and identify where in the BSTLM-SC these inputs are to be made.**

AT&T/MCI's Response: For appropriate calculations and references, please see the response to Staff POD 17. To implement the recommended changes the following should be done:

1. In the Table ***Underground Rural*** *Excavation Activity*, change elements *Bore Cable* and *Trench & Backfill* for each of the ***4 types*** of terrain.
2. In the Table ***Buried Rural*** *Excavation Activity*, change elements *Bore Cable* and *Trench & Backfill* for each of the ***4 types*** of terrain.
3. In the Table ***Underground Suburban*** *Excavation Activity*, change elements *Bore Cable* and *Trench & Backfill* for each of the ***4 types*** of terrain.
4. In the Table ***Buried Suburban*** *Excavation Activity*, change elements *Bore Cable* and *Trench & Backfill* for each of the ***4 types*** of terrain.
5. In the Table ***Underground Urban*** *Excavation Activity*, change elements *Bore Cable* and *Trench & Backfill* for each of the ***4 types*** of terrain.
6. In the Table ***Buried Urban*** *Excavation Activity*, change elements *Bore Cable* and *Trench & Backfill* for each of the ***4 types*** of terrain.

INTERROGATORY NO. 18: **For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 33, lines 14-17. Please identify what percentage of Verizon's conduit space in Manhattan is leased to the more than 30 companies referred to herein.**

AT&T/MCI's Response: The percentage of Verizon's conduit space in Manhattan leased (i.e., leased duct feet to total duct feet) is believed to be proprietary and has not been placed on the public record to the best of our knowledge.

INTERROGATORY NO. 19: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, Exhibit JCD-5, please identify the source of each value shown on this exhibit.

AT&T/MCI's Response: First, there are four typographical errors on Exhibit JCD-5. For Copper Cable Placing, the fourth row in the second and third examples are incorrect. The three examples should read BellSouth Placing Labor per **100** ft., BellSouth Placing Labor per **200** ft., and BellSouth Placing Labor per **640** ft., rather than all three indicating BellSouth Placing Labor per **100** ft.. For Copper Cable Splicing, the last example should read BellSouth splicing Labor per **4200** pairs, not per **200** pairs. These labeling errors do not affect the calculations.

Copper Cable Placing Rate to place 100 feet of cable, 200 feet of cable, and 640 feet of cable:

Placing Labor per 100 ft. is from the BSTLM study.

Crew size and Setup/Close Down Clock Hours are based on the expert opinion of Mr. Donovan.

The derived Placing Rate (sheath ft./day) represents the speed of placing sheath feet of cable after performing setup/close down operations. For example, if BellSouth's cost of 2.5 hours per 100 ft. of underground cable included setup/close down time, then 2 technicians would spend 1 clock hour each to setup/close down. They would then spend ¼ hour to place 100 feet of cable, times 2 technicians, accounts for the remaining ½ hour. In other words, one clock hour to setup/close down plus ¼ hour to place 100 ft. of cable = 1.25 hours x 2 technicians = BellSouth's 2.5 hours per 100

feet. If one setup/close down per day occurred, with ¼ hour per 100 feet for placing cable, then an 8 hour day would consist of one clock hour for setup/close down and 400 ft. per hour for 7 hours (2800 feet per day). This is a bit low, but could be used.

As stated in Mr. Donovan's rebuttal testimony, BellSouth's logic represents a condition of setup/close down, place 100 feet, setup/close down, place 100 feet, which is absurd. The other two examples indicate how BellSouth's logic fails to the point of being equivalent to placing only 640 feet per day.

Copper Cable Splicing Rate to splice one 100-pair cable:

Splicing Labor per 100 pairs is from the BSTLM study.

Crew size and Setup/Close Down Clock Hours are based on the expert opinion of Mr. Donovan.

Similar to the calculations for Copper Cable Placing, discussed above, an example for an Aerial Splice can be explained. One technician works an 8-hour day. BellSouth claims a rate of 3.32 hours to splice 100 pairs, including setup/close down time. Subtracting 2 hours of setup/close down time from the 3.32 hours, leaves 1.32 hours to splice 100 pairs. This is equivalent to a rate of 76 pairs per hour (100 ÷ 1.32 = 76). The remaining examples of splicing a 200 pair cable and splicing a 4200 pair cable show that BellSouth's method assumes that, at the highest level of productivity possible with its method, that each 100 pairs spliced requires 2 hours of setup/close down followed by 76 pairs per hour of splicing before spending another 2 hours to setup/close down plus 76 pairs per hour.

The alternative for a 4200 pair cable using BellSouth's method indicates that it would require 139.44 hours, consisting of 2 hours of setup/close down (rather than BellSouth's equivalent of 84 hours for 42 setups/close downs), followed by 137.44 hours to splice 4200 pairs, which would be equivalent to splicing only 31 pairs per hour (4200 ÷ 137.44 = 31).

INTERROGATORY NO. 20: For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Pitkin, Exhibit BFP-4.

INTERROGATORY NO. 20(a): Please identify the source for the values shown on this exhibit.

AT&T/MCI's Response: The source for these values in the BellSouth column is data provided by BellSouth. This information is located in the file: Attachment 5a.xls to Appendix B.

INTERROGATORY NO. 20(b): Please identify where the Exempt Material Expense and Plant Labor Expense are to be recovered.

AT&T/MCI's Response: The exempt material expense is to be recovered as part of the labor cost inputs in the BSTLM, consistent with the rebuttal testimony of Mr. Donovan. Plant labor expenses are also fully recovered by these labor costs inputs. In other words, the per-hour cost of placing and splicing are direct inputs to the model and are based on the testimony of Mr. Donovan.

INTERROGATORY NO. 21: For purposes of the following request, please refer to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Gillan, page 7, lines 18-23.

INTERROGATORY NO. 21(a): **Please define "UNE penetration."**

AT&T/MCI's Response: UNE Penetration is defined as the percentage of the switched access line market being served by UNE-loops, either obtained individually or as part of the combination with local switching (UNE-P).

INTERROGATORY NO. 21(b): **To the extent not indicated in response to (a), please indicate the numerator and denominator of the UNE penetration ratios shown.**

AT&T/MCI's Response: $\text{UNE Penetration} = \frac{\text{UNE-L Loops} + \text{UNE-P Loops}}{\text{Total Switched Access Lines}}$

Where UNE L Loops are the number of loops provided without local switching, and UNE-P loops are the number of UNE loops provided with local switching.

DATED this 25th day of January, 2002

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T and MCI WorldCom's Responses to FPSC Staff's Second Set of Interrogatories in Docket 990649A-TP has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 25th day of January, 2002.

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DECLASSIFIED NR 1-27-03
CONFIDENTIAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND MCI WORLDCOM, INC.'S JOINT RESPONSES TO FPSC STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

AT&T Communications of the Southern States, Inc. ("AT&T") and MCI WorldCom, Inc. ("MCI"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.350 and 1.280, Florida Rules of Civil Procedure, hereby submit the following Responses to FPSC Staff's Second Request for Production of Documents to AT&T and MCI.

REQUEST NO. 4: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Darnell, page 17, lines 17-24, please provide any and all work papers and documents that demonstrate or otherwise support the claim that the nonrecurring costs associated with element A.20.4 are currently recovered in the nonrecurring rate for element A.2.2.

AT&T/MCI's Response: See attached documents. BellSouth deems these documents proprietary.

REQUEST NO. 5: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Darnell, page 18, lines 21-25, please provide any and all work papers and documents that demonstrate or otherwise support the claim that the referenced material prices and installation times do not reflect those of a forward-looking, least-cost provider. Please indicate what values for these components would be considered reflective of a forward-looking, least-cost provider, and provide all documents that support these values.

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 00986-02. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

DOCUMENT NUMBER-DATE
00986 JAN 25 02
FPSC-COMMISSION CLERK

AT&T/MCI's Response: See documents provided in response to Request Number 4. In addition, please the attached document. The documents responsive to this request are proprietary and confidential.

REQUEST NO. 6: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 15, lines 8-10. To the extent not indicated in response to Staff's Interrogatory No. 13, please provide derivations of these two values.

AT&T/MCI's Response: The BellSouth-Florida engineering loading factors of 35.72% for fiber cable and 27.07% for all other outside plant items such as copper cable and structures may be found in BST-FL Investlogic.xls spreadsheet under Labor Rates & Loadings.

As stated in response to Staff Interrogatory No. 13, and as stated in Mr. Donovan's rebuttal testimony, we have been unable to identify any BellSouth justification or derivations of the BellSouth 35.72% and 27.07% engineering factors.

REQUEST NO. 7: Please provide all documents and work papers identified in response to Interrogatory No. 16(b).

AT&T/MCI's Response: As stated in response to Staff Interrogatory No. 16(b), there is no material associated with splice pits, and the materials associated with above ground closures are admitted by BellSouth to be included in Exempt Material loadings. There are no documents and work papers involved in this issue.

REQUEST NO. 8: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 33, lines 14-17, please provide all documents that support the assertion that more than 30 companies share Verizon's ducts in Manhattan.

AT&T/MCI's Response: The statement made by Mr. Donovan that more than 30 companies share Verizon's ducts in Manhattan are based on his personal observation, and his knowledge from

his experience as the Engineering District Manager for Midtown Manhattan when he worked for the Nynex Corporation, now Verizon.

REQUEST NO. 9: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 37, lines 5-9, please provide all work papers and supporting documents associated with the 184 foot weighted average span length.

AT&T/MCI's Response: Please see the response to Staff Request for Production Item No. 17.

REQUEST NO. 10: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 38, lines 7-8, please provide all documents that support the assertion that downguys and anchors can be expected to occur every 1,000 to 1,200 feet.

AT&T/MCI's Response: This assertion is based on Mr. Donovan's experience and expert knowledge, and has been supported by others as outlined in his rebuttal testimony. There are no additional documents.

REQUEST NO. 11: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 42, lines 1-7, please provide all documents that support each of the values contained in this paragraph.

AT&T/MCI's Response: The assertions regarding cable placing setup times and feet per day are based on Mr. Donovan's experience and expert knowledge. There are no additional documents.

REQUEST NO. 12: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 44, line 20, please provide all work papers and supporting documents that yield the value shown as BellSouth's consistent wire work splicing rate.

AT&T/MCI's Response:

REQUEST NO. 13: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 52, lines 5-8, please provide all documents that support the value shown as the typical labor load component associated with exempt materials.

AT&T/MCI's Response: The assertions regarding normal Exempt Material dollar loading per hour of productive labor are based on Mr. Donovan's experience and expert knowledge. There are no additional documents.

REQUEST NO. 14: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Donovan, page 53, lines 6-9, please provide all documents that support the witness' belief that the loaded labor rates already include exempt material.

AT&T/MCI's Response: A thorough search of documents produced by BellSouth in this proceeding have failed to uncover any subtraction of Exempt Material loadings from the claimed fully loaded labor rate used by BellSouth. It is well know, and admitted by BellSouth, that Exempt Material loadings are always included in a fully loaded labor rate. BellSouth, to the best of our knowledge, has produced no evidence showing that they subtracted that typical loading.

REQUEST NO. 15: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Pitkin, Exhibit BFP-5, please provide all work papers and documents that support this exhibit, including but limited to, the CA Turner indexes used and the derivation of the linear trended TPI.

AT&T/MCI's Response: The excel worksheet "TPI.xls" which supports Exhibit BFP-5 is included on the attached CD. "TPI.xls" was also filed on the CD provided in response to BellSouth Telecommunications, Inc.'s First Data Requests to AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. request #7.

REQUEST NO. 16: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Pitkin, Exhibit BFP-6, please provide all work papers and documents that support this exhibit.

AT&T/MCI's Response: Information supporting Exhibit BFP-6 is being provided as an attached PDF file. In those locations where the HAI Model is advocated, specific documentation is provided regarding the installed costs of DLC equipment based on the experience of members of the engineering team supporting the HAI Model (including the experiences of Mr. Donovan who has had direct experience in negotiating for and placing purchasing of more than $1 million per work day in such electronic equipment). Exhibit BFP-6 used those DLC equipment and labor values, in the manner presented in documentation, to artificially create the In-Plant Factors so that they could be used in the Florida model which requires such entries. A detailed breakdown of DLC costs is attached. It is also being provided as a PDF file labeled *Response to POD 2-16 Att A.pdf* and includes drawing of DLC equipment and associated costs, including engineering and installation labor

REQUEST NO. 17: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Pitkin, Exhibit BFP-7, please provide all work papers and documents that support this exhibit, including derivations of each of the WorldCom/AT&T Input values shown.

AT&T/MCI's Response: The work papers and documentation that support Exhibit BFP-7 can be found as follows:

a. Splicing and placing hours -- Testimony of John Donovan dated December 10, 2001, Donovan Att JCD-6.pdf, and pg 9-10 Donovan Att JCD-8.doc.

b. Material Loading - Engineering Rate -- Testimony of John Donovan dated December 10, 2001 and pg 1 Donovan Att JCD-8.doc.

c. Material Loading - Other Rate -- Calculation of the "Other Rate" is based on BellSouth's Attachment 5A to Appendix B. For each FRC, the Other Rate is calculated as the sum of the "Right Of Way Items" plus the "Interest During Construction Items".

d. Material Loading - Material Inflation -- Refer to answer to Staff Request for Production of Documents Item No. 15.

e. Material Loading - Misc. Material Rate -- Testimony of John Donovan dated December 10, 2001 and pg 1 Donovan Att JCD-2.doc and pg 2 Donovan Att JCD-8.doc.

f. Poles Material Cost -- Testimony of John Donovan dated December 10, 2001 and pg 14 "Pole Material" Donovan Att JCD-8.doc.

g. Poles Contract Labor Cost -- See Testimony of John Donovan dated December 10, 2001 and pg 3 Donovan Att JCD-2.doc "Pole Labor." Pole labor of $147.69 is multiplied by 20% for exempt materials, producing a total pole labor cost of $177.23.

h. Anchor Labor Cost -- See Testimony of John Donovan dated December 10, 2001. Anchor labor cost of $79.49 (from BellSouth's Attachment 3 to Appendix B, without BellSouth's "Miscellaneous Factor) is multiplied by 20% for exempt materials, producing a total anchor labor cost of $95.39.

i. Aerial Structural Placing Hours -- See Testimony of John Donovan dated December 10, 2001.

j. Splicing and Placing Labor Rates -- See Testimony of John Donovan dated December 10, 2001. Labor rate of $49.05 is multiplied by 20% for exempt materials, producing a total labor cost of $58.86.

k. Pole Spacing -- See Testimony of John Donovan dated December 10, 2001. For calculation of weighted average, see "Pole Space.xls". "Pole Space.xls" was also filed on the CD provided in response to BellSouth Telecommunications, Inc.'s First Data Requests to AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. request #7.

l. Anchor Spacing -- See Testimony of John Donovan dated December 10, 2001.

m. Conduit Material (Duct) -- See Testimony of John Donovan dated December 10, 2001 and pg 11 "Conduit Material" Donovan Att JCD-2.xls.

n. Underground Excavation Contract Labor -- See Testimony of John Donovan dated December 10, 2001, Pitkin Attachment BFP-8E.xls and pg 5 Donovan Att JCD-8.xls.

o. Underground Excavation Activity -- See Testimony of John Donovan dated December 10, 2001, Pitkin Attachment BFP-8E.xls and pg 5 Donovan Att JCD-8.xls. For breakdown of boring percentage, see "Bore Cable by Zone.xls". "Bore Cable by Zone.xls" was also filed on the CD provided in response to BellSouth Telecommunications, Inc.'s First Data Requests to AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. request #7.

p. Underground Sharing -- See Testimony of John Donovan dated December 10, 2001.

q. Buried Excavation Contract Labor -- See Testimony of John Donovan dated December 10, 2001, Pitkin Attachment BFP-8D.xls and pg 2-4 Donovan Att JCD-8.xls.

r. Buried Excavation Activity -- See Testimony of John Donovan dated December 10, 2001, Pitkin Attachment BFP-8D.xls. For breakdown of boring percentage, see "Bore Cable by Zone.xls". "Bore Cable by Zone.xls" was also filed on the CD provided in response to BellSouth Telecommunications, Inc.'s First Data Requests to AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. request #7.

s. Buried Sharing -- See Testimony of John Donovan dated December 10, 2001.

t. Manholes -- See Testimony of John Donovan dated December 10, 2001, Pitkin Attachment BFP-8F.xls and pg 12 "Manholes" Donovan Att JCD-2.xls. For Manhole sizes 2,3 and 5, a 50% sharing reduction has been applied resulting in inputs of $731.68, $731.68, and $2,016.04, respectively.

u.. Facility Sharing -- See Testimony of John Donovan dated December 10, 2001.

v. DLC In-Plant Factor -- See Attachment BFP-6.xls and answer to Staff Request for Production of Documents Item No. 16.

REQUEST NO. 18: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Pitkin, Exhibit BFP-8, please provide all work papers and documents that support this exhibit.

AT&T/MCI's Response: The work papers and documents that support Exhibit BFP-8 have been provided in response to Staff Request for Production of Documents Items Nos. 15, 16, and 17.

REQUEST NO. 19: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Pitkin, Exhibit BFP-10, please provide all work papers and documents that support this exhibit, including but not limited to all intermediate and supporting calculations that yield the derivation of the zone-specific rates.

AT&T/MCI's Response: The zone specific rates are calculated in the Final Cost Summary provided by BellSouth. Attached are the wire center specific results that are used to calculate the zone specific rates.

REQUEST NO. 20: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Gillan, page 4, lines 4-10, please provide all work papers and supporting documents that yield the statewide average costs of $25.07 and $13.99 shown herein.

AT&T/MCI's Response: See attached documents.

REQUEST NO. 21: Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Gillan, Exhibit JPG-1, please provide all work papers and documents that support this exhibit and yield the derivation of the values shown.

AT&T/MCI's Response: See attached documents.

REQUEST NO. 22:. Referring to the December 10, 2001 rebuttal testimony of WorldCom/AT&T witness Gillan, Exhibit JPG-2, please provide all work papers and documents that support this exhibit and yield the derivation of the values shown.

AT&T/MCI's Response: See attached documents.

DATED this 25th day of January, 2002

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POD-4

PROPRIETARY

BellSouth Telecommunications, Inc.

Hybrid Copper/Fiber
xDSL-Capable Loop DSLAM

	A	B	C	D	E	F	G	H	I	J	K
1	Florida										
2	Index Sheet										
3	Study Period: 2000-2002										
4											
5											
6											
7											
8			**Sheet Name:**		**Description:**						
9			Index		Hybrid Copper/Fiber - xDSL-Capable Loop						
10			Investments		CALCULATOR INPUT FORM - MATERIAL/INVESTMENT DATA						
11			Nonrecurring Labor		CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES						
12			INPUT_Monthly		Monthly Cost Inputs						
13			INPUT_NRC		Detailed Labor Worktimes						
14			WP100		Development of Microram Utilized Material Price						
15											
16											
17											
18											
19											
20											
21											

Jan 29 2002 14:42 P.02
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WORLDCOM LPP

Dslam

Jan 25 2002 14:45 P.03
Fax:7028455529
WORLDCOM LPP

CALCULATOR INPUT FORM - MATERIAL/INVESTMENT DATA

Instructions:

1. Use this worksheet to record material and/or investments to be input into the Calculator calculations.
2. All amounts shown are per unit (e.g., per call, per loop, per MOU).
3. Input data, by Cost Element, leaving no blank lines. On next row after last line of data, type END in Cost Element Column.
4. All data on this form should be cell-referenced to study workpapers.
5. Do NOT change columns, headings, sheet name.

State	Cost Element #	FRC	Sub FRC	Volume Sensitive $ Amount	Volume Insensitive $ Amount
FL	A.20.3	257C	13	6950	
FL	A.20.3	357C	15	46.03873239	
FL	A.20.3	357C	09	421.8309859	
FL	A.20.3	257C	37	2244.666667	
	END				

BellSouth Telecommunications, Inc.

Hybrid Copper/Fiber
xDSL-Capable Loop DSLAM

CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES

Instructions:

1. Use this worksheet to record nonrecurring labor times to be input into the Calculator calculations.
2. All amounts shown are per unit (e.g., per call, per loop, per NOU).
3. Input data, by Cost Element, leaving no blank lines. Do need now after last line of data, type END in Cost Element Column.
4. All data on this form should be cell-referenced to study workpapers.
5. Do NOT change columns, headings, sheet name.
6. Use columns F & G when cost element has a single nonrecurring cost; use columns H, I, J, & K for elements with a first and additional nonrecurring cost; use columns L, M, N & O for elements with an initial and subsequent nonrecurring cost.
7. Input Cost Element Life (in months) on first row of data for each cost element. It is not necessary to repeat on each line.

Study Mid-Point Date (Mos.): 6/1/1998

State	Cost Element #	Cost Element Life (Mo)	Labor Expense Description (Limited to 25 characters)	JFCI Playband	(For use w/ one NR) Installation Time (Hours)	(For use w/ one NR) Disconnect Time Hours	First Installation Time (Hours)	First Disconnect Time Hours	Additional Installation Time (Hours)	Additional Disconnect Time Hours	Initial Installation Time (Hours)	Initial Disconnect Time Hours	Subsequent Installation Time (Hours)	Subsequent Disconnect Time Hours
FL	A.20.3	5	SERVICE INQUIRY	SDWC	2.0319									
FL	A.20.3	5	SERVICE INQUIRY	221X	0.5888									
	END													

Maximum of 25 entries per Cost Element #

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Ds/am

	A	B	C	D	E
1	Florida				
2	Monthly Cost Inputs				
3	Study Period: 2000-2002				
4					
5	Element #: A.20.3				
6	Item/Description			Source	Amount
7	Description	FRC	SubFRC		
8					
9	16-Port DSLAM				
10	Material Price	257C	13	Network Planning & Support	$6,960.000
11	Management DS1's per Microgram			Network Planning & Support	1
12					
13					
14	Standard Density Hub Bay				
15	Material Price	357C	15	Network Planning & Support	$4,184.000
16	Capacity (Number of DS1's)			Network Planning & Support	128
17	Projected Actual Utilization			Network Planning & Support	71%
18					
19					
20	Standard Hub Bay DS1 Card				
21	Material Price	357C	09	Network Planning & Support	$1,198.000
22	Capacity (Number of DS1 ports)			Network Planning & Support	4
23					
24					
25	Remote Terminal Housing - Cabinet				
26	Material Price	257C	37	Network Planning & Support	$18,200.000
27	Percent of time new cabinet required			Network Planning & Support	37%
28	Microrams per cabinet			Network Planning & Support	3
29					
30					

Should be about $2000.

$6,960.000

37%

Values Scorched node. Should be Ø.

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	A	B	C	D	E	F
1	Florida					
2	Detailed Labor Worktimes					
3	Study Period: 2000-2002					
4						
5	Element A.20.3					
6					Worktimes (Hr.)	
7	Item/Description	Source	Description	JG / WS	Install	Disconnect
8	COMPLEX RESALE SUPPORT GROUP (CRSG)	Network	SERVICE INQUIRY	SDWC	0.2268	0.0000
9	VALIDATE SWLSR	Network	SERVICE INQUIRY	SDWC	0.9070	0.0000
10	E-MAIL SAC	Network	SERVICE INQUIRY	SDWC	0.1134	0.0000
11	NOTING FOLDER/BRITE	Network	SERVICE INQUIRY	SDWC	0.0032	0.0000
12	FILING	Network	SERVICE INQUIRY	SDWC	0.0602	0.0000
13	CLARIFY CLEC	Network	SERVICE INQUIRY	SDWC	0.0376	0.0000
14	RETRIEVE SAC SI	Network	SERVICE INQUIRY	SDWC	0.1701	0.0000
15	PREPARING FAX/FAXING	Network	SERVICE INQUIRY	SDWC	0.4535	0.0000
16	E-MAILING CLEC	Network	SERVICE INQUIRY	SDWC	0.0036	0.0000
17	REMOVING FROM C_AR	Network	SERVICE INQUIRY	SDWC	0.0567	0.0000
18	CHECKING LON				2.0319	0.0000
19	Total CRSG (SD)					
20		Network	SERVICE INQUIRY	221X	0.5667	0.0000
21	CLERICAL WORK (CRSG)					
22		DS1 Subloop Feeder			51	
23	Service Location Life (months)					

No electronic ordering & provisioning.
They don't incur this cost when they provide their Fast Access DSL.
Discrimination?

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	A	B	C	D	E
1	Florida				
2	Development of Microram Utilized Material Price				
3	Study Period: 2000-2002				
4					
5	Element #: A.20.3				
6	Item/Description				
7	Description	FRC	SubFRC	Source	Amount
8					
9	16-Port DSLAM	257C	13	INPUT_ Monthly E10	$6,950.00
10					
11	Standard Density Hub Bay	357C	15		
12	Material Price			INPUT_ Monthly E15	$4,184.00
13	Capacity (Number of DS1's)			INPUT_ Monthly E16	128
14	Projected Actual Utilization			INPUT_ Monthly E17	71%
15	Management DS1's per Microram			INPUT_ Monthly E11	1
16	Hub Bay per Microram			E12/E13/E14*E15	$46.04
17					
18	Standard Hub Bay DS1 Card	357C	09		
19	Material Price			INPUT_ Monthly E21	$1,198.00
20	Capacity (Number of DS1 ports)			INPUT_ Monthly E22	4
21	Projected Actual Utilization			INPUT_ Monthly E17	71%
22	Management DS1's per Microram			INPUT_ Monthly E11	1
23	Hub Bay Card per Microram			E19/E20/E21*E22	$421.83
24					
25	Remote Terminal Housing - Cabinet	257C	37		
26	Material Price			INPUT_ Monthly E26	$18,200.00
27	Percent of time new cabinet required			INPUT_ Monthly E27	37%
28	Microrams per cabinet			INPUT_ Monthly E28	3
29	Cabinet per Microram			E26*E27/E28	$2,244.67
30					

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