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March 11, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:


Please find enclosed for filing an original and 15 copies of CORRECTED page 22 of the Direct Testimony of David G. Tucek originally filed November 7, 2001 in the above matter. The correction at line 21, which is shaded, changes the words "wire center" to "census block." Please replace the existing page 22 with the enclosed corrected page in Mr. Tucek's testimony. Copies are being provided to parties of record.

If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,


Kimberly Caswell

KC:tas
Enclosures

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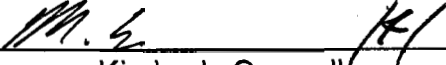
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via U.S. mail and electronic mail on March 11, 2002 to the parties on the attached list.



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1 providing service to these end users. If such an end user decides to
2 leave Verizon in favor of a CLEC, and if the CLEC only orders an
3 unbundled loop in order to provide service to that end user, then Verizon
4 must terminate that end user's loop at the mainframe in order to hand it
5 off to the CLEC. A cost model that assumes all new plant and technology
6 does not capture these transition costs.

7

8 Because such a model assumes economies of scope and scale that will
9 not be realized, and because many real-world constraints are ignored, the
10 model results will underestimate the long-run, forward-looking costs of
11 provisioning UNEs. Hence, the long-run costs produced by such a model
12 are a lower bound.

13

14 **Q. PLEASE EXPLAIN HOW ICM-FL MODELS CUSTOMER LOCATIONS**
15 **USING ROAD FEET DATA.**

16 A. The basic unit of analysis in the Loop Module is the Demand Unit, which
17 is a grid that is 1/200th by 1/200th of a degree in size. For Tampa, this
18 equates to 1,823 feet by 1,617 feet, or about 0.11 square miles. Utilizing
19 line count estimates by census block from PNR Associates, Stopwatch
20 Maps assigns customer lines to each Demand Unit on the basis of each
21 grid's share of road feet in the census block. The Demand Units are
22 assigned to each wire center based on Verizon's tariffed exchange
23 boundaries and the resulting totals for each wire center are trued up to
24 Verizon's actual line counts by wire center. The road feet measure in
25 ICM-FL is taken from the US Census Bureau's TIGER files, and