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April 25, 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

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

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of Revised Pages 57 and 58 of the Direct Testimony of Dennis B. Trimble which reflects a change in the answer regarding the effective date of UNE rates. These revised pages replace the original pages filed on November 7, 2001.

Also enclosed are an original and 15 copies of Revised Exhibit DGT-2 of the Direct Testimony of David G. Tucek which reflects dashed arrows (Manual Linkage) and solid arrows (Automatic Linkage); revised page 73 of Mr. Tucek's surrebuttal testimony which changes "19.89" percent to "20.17" percent at line 18; and Revised Surrebuttal Exhibit DGT-6, pages 1 and 2. As shown in the note on page 1 of 2, the original exhibit reduced the denominator for change in common costs instead of direct costs.

AUS _____
CAF _____
CMP _____
COM 5 for Service has been made as indicated on the Certificate of Service. If there are any
CTR _____ questions regarding this filing, please contact me at 813-483-2617.
ECR _____
GCL _____

OPC _____ Sincerely,
MMS _____

SEC 1
OTH _____

bc Kimberly Caswell

KC:tas
Enclosures

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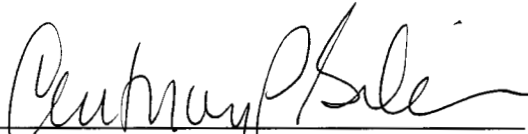
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing documents in Docket No. 990649B-TP were sent via electronic mail on April 24, 2002 and U.S. mail on April 25, 2002 to the parties on the attached list.



for Kimberly Caswell

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The FCC also required ILECs to allow CLECs to self-certify that they are providing a significant amount of local exchange service over combinations of UNEs. ILECs are allowed to subsequently conduct limited audits by an independent third party to verify the requesting carrier's compliance with the local usage requirements. (Supplemental Order Clarification, ¶ 29). When converting from special access rates to UNE rates, the full termination liability will apply, if applicable.

J. ISSUE 13: RATE EFFECTIVE DATE

Q. WHEN SHOULD THE RECURRING AND NON-RECURRING RATES AND CHARGES TAKE EFFECT?

A. Unless the particular contract specifies otherwise, recurring and non-recurring rates for service already provided under the contract should take effect on the date the Commission issues its final order prescribing the permanent UNE rates for Verizon Florida. At that time, Verizon Florida will inform the ALECs of any rate changes by distributing notices of revised rates or by posting them on Verizon's website. For new services or facilities, of course, an amendment must be negotiated setting forth the terms and conditions (including price) under which they will be provided. This is the best approach for streamlining the implementation of new, Commission-ordered rates.

1 If a rate for a particular UNE is established in this proceeding, but a
2 CLEC's current interconnection agreement does not include that UNE,
3 the CLEC is not entitled to the UNE until the parties execute an
4 appropriate amendment. In this way, the parties can ensure that all
5 related terms and conditions are included.

6
7

8 **IV. SUMMARY**

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10 **Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

11 **A.** UNE prices should not be further deaveraged in the absence of cost-
12 based, deaveraged retail rates. Wholesale deaveraging alone will only
13 exacerbate existing CLEC arbitrage opportunities, thus undermining
14 this Commission's goals of promoting efficient competition and
15 universal service. The best approach is to leave the ILEC-specific
16 zones in place until retail and wholesale rates can be made consistent.

17

18 If the Commission, however, decides to move forward with further
19 deaveraging here, it should deaverage only those UNEs that exhibit
20 material cost variations with geography. UNE costs should be
21 calculated at a wire center level, with wire centers mapped into rate
22 zones and a single UNE price set for each zone. At this time, only

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