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April 29, 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

RECEIVED FPSC
02 APR 29 AM 11:48
COMMISSION
CLERK

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

Dear Ms. Bayo:

At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental documentation for previously submitted Requests for Confidential Classification as follows:

1. Responses to Staff's Amended First Set of Interrogatories (Nos. 1, 2, 12, 14, 15, 20, 21, 54, 55, 66, 67) (original request filed November 7, 2001); 04645-02
04646-02
2. Confidential Exhibit DBT-3 (Direct Testimony of Dennis B. Trimble) (original request filed November 7, 2001); 04647-02
04648-02
3. Responses to Staff's Second Set of Interrogatories (No. 59) and Second Request for Production of Documents (Nos. 27 and 44) (original request filed January 16, 2002); 04649-02
04650-02
4. Responses to Staff's Third Request for Production of Documents (Nos. 49, 50, 53, 57, 58, 59) (original request filed January 25, 2002); 04651-02
04652-02
5. Responses to AT&T/MCI's First Set of Interrogatories (No. 43) and First Request for Production of Documents (Nos. 3,6,13,14) (original request filed February 27, 2002); 04653-02
04654-02
6. Responses to Staff's Fifth Set of Interrogatories (No. 108) (original request filed February 28, 2002); 04655-02
04656-02


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7. Responses to Staff's Fifth Request for Production of Documents (Nos. 65 and 67) (original request filed March 6, 2002);
04657-02
04658-02
8. Confidential Exhibit DGT-5 (Surrebuttal Testimony of David G. Tucek) (original response filed March 18, 2002); and
04659-02
04660-02
9. Responses to Staff's First Request for Production of Documents (No. 3) (original request filed December 21, 2001).
04661-02
04662-02

Highlighted copies of the confidential information are attached in sealed envelopes together with one redacted copy and a line-by-line justification (Exhibit-C).

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

Sincerely,


KC
Kimberly Caswell

KC:tas
Enclosures

c: Jason Fudge, Staff Counsel (w/e)

990649B-TP ORIGINAL

Exhibit C
Staff's Fifth Request for Production of Documents
Nos. 65 and 67

Page Nos.	Line(s)/Column(s)	Reason
Bates No. 2647 Bates No. 2648 Bates No. 2649 Bates No. 2650	L1, col. B-J L2, col. B-D L3-5, highlighted data L1-9, col. B-J L10-12, highlighted data Col. D Col. D	Contains supporting documentation used as inputs for the productive minutes in Verizon's nonrecurring cost study. Cost study information is routinely granted confidential classification because disclosure of the inputs (and subsequent costs) would give competitors an undue advantage in tailoring their entry and pricing strategies to compete successfully with Verizon. The PSC has already granted confidential classification for Verizon's nonrecurring study (Order PSC-02-0427-CFO-TP).
POD No. 67	See previously provided redacted CD	Contains confidential customer information at the wire center level. Information at the wire center level will give competitors an artificial advantage in fashioning their entry and expansion strategies in the most effective manner. Information would allow competitors to know where Verizon might be most vulnerable to competition.

DOCUMENT NUMBER DATE

04657 APR 29 2008

FPSC-COMMISSION CLERK

Florida Carrier Access NRC Study
 Use Productive Hours (BPO)

	A	B	C	D	E	F	G	H	I	J
	TEAM B	TEAM E	TEAM A	TEAM C	TEAM D	TOTAL SC BPO HOURS	MANUAL ORDER INPUT	TOTAL LESS MANUAL	QUALITY TEAM	
1	A ¹	B ¹	C ¹	D ¹	E ¹	F = Sum (A..E)	G ²	H = F - G	I ¹	
SPECIALS SWITCHED										

	A	B	C	D
	CO. ORDINATORS	SR. ADMIN	UNGUIDED	
2	TOTAL			

MOG PROJ
 ESC SC
 SC

Note 1: Productive hours are obtained from summary reports provided by GTE Resource Management

Note 2: The manual BPO hours were calculated by multiplying the 0.56 extra hours to process a manual order times the manual order volume from Support 3.1 and 4.2.

Note 3: Each "Team" represents a group within GTE that serves a particular IC or group of ICs. GTE applied labels A through D to prevent the release of this competitive data

REDACTED

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GTE
 Florida Carrier Access NRC Study
 Base Productive Hours (BPO)

	A	B	C	D	E	F	G	H	I	J
NCC SPECIALS SWITCHED	NCC TEAM	SPRINT TEAM	ATT TEAM	MCI TEAM	OCC TEAM	QUALITY TEAM	COORDINATORS	SR. ADMIN	UNGUIDED	
	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
SPRINT SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
ATT SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
MCI SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
OCC SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
QUALITY SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
COORD SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
SR. ADMIN SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
UNGUIDED SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS
	TOTALS	NCC TEAM	SPRINT TEAM	ATT TEAM	MCI TEAM	OCC TEAM	QUALITY TEAM	COORDINATORS	SR. ADMIN	UNGUIDED
SPECIALS SWITCHED	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS	JAN FEB TOTALS

- 0 Note 1: Productive hours are obtained from summary reports provided by GTE Resource Management
- 1 Note 2: Service Consultants are loaned between groups depending upon the work load. This is captured above by the times under different work groups.
- 2 Note 3: The time period studied (Jan and Feb) had an abnormally high overtime rate compared to historical average and expected future rates. Therefore, overtime was capped at the 12% historical average.

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 ESC SC
 SC

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REDACTED

NRC COST STUDY INFORMATION REQUEST
APC

State: Florida

A APC WORK CENTER AND LOCATION	B JOB TITLE	C JOB DUTIES	D TOTAL PRODUCTIVE HOURS
APC-LAKELAND	Assignment Clerk	Select Assignment	
APC-LAKELAND	Admin Support Clerk	Administration	
APC-TAMPA	Assignment Clerk	Select Assignment	
APC-TAMPA/LAKELAND	Complex Line Assignnor	SPAG Assignment	
APC-TAMPA	Complex Line Assignnor	Open Market Transition Coord	
APC-TAMPA	Admin Support Clerk	Administration	
APC-CLEARWATER	Assignment Clerk	Select Assignment	
APC-CLEARWATER	Customer Inquiry Advocate	Pending Order Inquiry	
APC-CLEARWATER	Complex Line Assignnor	SPAG Assignment	
APC-TAMPA	Admin Support Clerk	Administration	
APC-BRADENTON	Assignment Clerk	Select Assignment	

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REDACTED

**NRC COST STUDY INFORMATION REQUEST
BRPC and OUTSIDE PLANT (OSP)**

State: ^{Florida}
A

B

C

D

BRPC and OSP	JOB TITLE	JOB DUTIES	TOTAL PRODUCTIVE HOURS
BRPC-FLORIDA	Facility Clerk	Administration-Non Message	
BRPC-FLORIDA	Facility Clerk	Administration-Message	
BRPC-FLORIDA	Facility Clerk	SOE-Non Message	
BRPC-FLORIDA	Facility Clerk	SOE-Message	
BRPC-FLORIDA	Desgin Tech	SOE-Non Message	
BRPC-FLORIDA	Desgin Tech	SOE-Message	
BRPC-FLORIDA	Facility Clerk	Circuit Design-DS0	
BRPC-FLORIDA	Admin Support Clerk	Circuit Design-DS0	
BRPC-FLORIDA	Design Technician	Circuit Design-DS0	
BRPC-FLORIDA	Business Response Specialist	Circuit Design-DS0	
BRPC-FLORIDA	Facility Clerk	Circuit Design-HiCaps	
BRPC-FLORIDA	Admin Support Clerk	Circuit Design-HiCaps	
BRPC-FLORIDA	Design Technician	Circuit Design-HiCaps	
BRPC-FLORIDA	Business Response Specialist	Circuit Design-HiCaps	
BRPC-FLORIDA	Facility Clerk	Circuit Design-Message	
BRPC-FLORIDA	Admin Support Clerk	Circuit Design-Message	
BRPC-FLORIDA	Design Technician	Circuit Design-Message	
BRPC-FLORIDA	Business Response Specialist	Circuit Design-Message	
BRPC-FLORIDA	Facility Clerk	Hi-Cap Prework	
BRPC-FLORIDA	Assignor	Hi-Cap Prework	
BPRC-IN	DBM	Switch Updates	
OSP - FLORIDA	Level 5	Cable Splicer	
OSP - FLORIDA	Construction Splicer - Access Design	Cable Splicer	
OSP - FLORIDA	Level 5	Cable Splicer	
OSP - FLORIDA	Construction Splicer - Access Design	Cable Splicer	
OSP - FLORIDA	Level 5	Cable Splicer	