

981834-TP
990321-TP

REQUEST: Staff's Second Request for Production of Documents to AT&T

DATED: May 3, 2003

POD 20: Referring to AT&T witness Turner's rebuttal testimony, page 12, lines 21-23, please provide the derivation of the 37.6% and all supporting documents and work papers.

Response: *First*, Please see the response to Interrogatory 39(b).

Second, there are no supporting documents or work papers for this calculation. However, the following will explain the derivation of this percentage.

The Sprint investment per DC Amp (*****BEGIN CONFIDENTIAL END CONFIDENTIAL*****) is 7.9 percent greater than BellSouth's. Therefore, part of the difference in the monthly cost per amp between BellSouth and Sprint and be explained with the different starting point in the investment. If this 7.9 percent increase is applied to the BellSouth cost per amp (\$10.87), then the BellSouth monthly cost assuming the use of Sprint's investment per amp is \$11.73. This cost can then be compared to the Sprint monthly cost so that the impact of the factor difference can be isolated. Comparing the \$11.73 value to Sprint's monthly cost of \$16.14 shows that Sprint's factors lead to costs being 37.6 percent higher.