

ORIGINAL



Tracy Hatch
Senior Attorney
Law and Government Affairs
Southern Region

Suite 700
101 N. Monroe Street
Tallahassee, FL 32301
850-425-6360

December 26, 2003

BY OVERNIGHT MAIL

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RECEIVED-TPSC
03 DEC 26 AM 10:45
COMMISSION
CLERK

Re: Docket Nos. 030851-TP

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen (15) copies of the Supplemental Direct Testimony of Steve Turner, including new Exhibit SET-5 and nine (9) copies of the revised CD-ROM (Exhibit SET-2), filed on behalf of AT&T Communications of the Southern States, LLC's in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to Lisa Sapper in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

Tracy Hatch/las
Tracy W. Hatch

RECEIVED & FILED
lh
FPSC-BUREAU OF RECORDS

DISTRIBUTION CENTER
03 DEC 26 AM 10:36

AUS _____
CAF _____
CMP _____
COM 5 *orig*
CTR _____
ECR _____ TWH/las
GCL 1 Enclosure
OPC _____
MMS 2 cc: Parties of Record
SEC 1
OTH _____

DOCUMENT NUMBER-DATE
13485 DEC 26 03
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 030851-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail and U.S. Mail as indicated this 26th day of December 2003, to the following parties of record:

<p>Jeremy Susac Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850</p>	<p>BellSouth Telecommunications, Inc. * Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640 Email: nancy.sims@bellsouth.com</p>
<p>Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: mgross@fcta.com</p>	<p><u>MCI WorldCom Communications, Inc. *</u> Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: donna.mculty@wcom.com</p>
<p>Sprint – Florida Susan S. Masterton 1313 Blairstone Road MC: FLTLHO0107 Tallahassee, FL 32301 Phone: (850) 847-0244 Fax: 878-0777 Email: susan.masterton@mail.sprint.com</p>	<p>KMC Telecom III, LLC * Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119 Phone: (678) 985-6261 Fax: (678) 985-6213 Email: marva.johnson@kmctelecom.com</p>
<p>Covad Communications Company* Charles E. Watkins 1230 Peachtree Street, NE 19th Floor Atlanta, GA 30309 Phone: (404) 942-3492 Email: gwatkins@covad.com</p>	<p>ITC^DeltaCom * Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802 Phone: (256) 382-3856</p>
<p>McWhirter Reeves McGlothlin Davidson Kaufman & Arnold, PA Vicki Gordon Kaufman 117 South Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Email: vkaufman@mac-law.com</p>	<p>Verizon Florida Inc. Mr. Richard Chapkis/Kim Caswell 201 N. Franklin Street, MCFLTC0007 Tampa, FL 33601 Phone: (813) 483-2606 Fax: (813) 204-8870 Email: richard.chapkis@verizon.com</p>
<p>Allegiance Telecom of Florida, Inc. Charles V. Gerkin, Jr. 9201 North Central Expressway Dallas, TX 75231 Phone: (469) 259-4051 Fax: 770-234-5965 Email: charles.gerkin@algx.com</p>	<p>Allegiance Telecom, Inc. Terry Larkin 700 East betterfield Road Washington, DC 60148 Phone: 630-522-6453 Email: terry.larkin@algx.com</p>

<p>Messer Law Firm Floyd Self/Norman Horton P.O. Box 1876 Tallahassee, FL 32302-1876 Phone: 850-222-0720 Fax: 850-224-4359</p>	<p>MCI WorldCom Communications, Inc.(GA) De O'Roark, Esq. Six Concourse Parkway, Suite 600 Atlanta, GA 30328 Email: de.oroark@wcom.com</p>
<p>Granite Telecommunications, LLC Rand Currier/Geoff Cookman 234 Copeland Street Quincy, MA 02169-4005 Phone: (617) 847-1500 Fax: (617) 847-0931 Email: rcurrier@granitenet.com</p>	<p>Miller Isar, Inc. Andrew O. Isar 7901 Skansie Avenue, St. 240 Gig Harbor, WA 98335 Phone: (253) 851-6700 Fax: (253) 851-6474 Email: aisar@millerisar.com</p>
<p>Moyle Law Firm (Tall) Jon Moyle, Jr. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: 681-8788 Email: jmoylejr@moylelaw.com</p>	<p>NewSouth Communications Corp. Jake E. Jennings/Keiki Hendrix Two North Main Center Greenville, SC 29601-2719 Phone: (864) 672-5877 Fax: (864) 672-5313 Email: jejennings@newsouth.com</p>
<p>BellSouth Telecommunications, Inc. R. Douglas Lackey 675 W. Peachtree Street, Suite 4300 Atlanta, GA 30375 Phone: (404) 335-0747</p>	<p>Supra Telecommunications and Info. Systems Jorge Cruz-Bustillo 2620 S.W. 27th Avenue Miami, FL 33133 Phone: (305) 476-4252 Fax: (305) 443-1078 Email: Jorge.cruz-bustillo@stis.com</p>
<p>Supra Telecommunications and Info. Systems Jonathan Audu 1311 Executive Center Drive, Suite 220 Tallahassee, FL 32301-5027 Phone: (850) 402-0510 Fax: (850) 402-0522 Jonathan.audu@stis.com</p>	<p>Sprint (KS) Kenneth A. Schifman 6450 Sprint Parkway Mailstop: KSOPHN0212-2A303 Overland Park, KS 66251-6100 Phone: 913-315-9783</p>
<p>Sprint (NC) H. Edward Phillips, III 14111 Capital Blvd. Mailstop: NCWKF0313-3161 Wake Forest, NC 27587-5900 Phone: 919-554-7870</p>	<p>Xspedius Communications Ms. Rabinai E. Carson 5555 Wingham Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220 Fax: (301) 361-4277 Email: rabinai.carson@xspedius.com</p>
<p>Matthew Feil FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801 (407) 835-0460 mfeil@mail.fdn.com</p>	<p>Scott A. Kassman FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801 (407) 447-6636 skassman@mail.fdn.com</p>

<p>Michael B. Twomey AARP 8903 Crawfordsville Road Tallahassee, FL 32305 Phone: (850) 421-9530 Fax: 421-8543 Email: miketwomey@talstar.com</p>	<p>Casey & Gentz, L.L.P. Bill Magness 919 Congress Avenue, Suite 1060 Austin, TX 78701 Phone: 512-225-0019 Fax: 512-480-9200</p>
--	--

Tracy Hatch / las

Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.)

SUPPLEMENTAL DIRECT TESTIMONY OF

STEVEN E. TURNER

ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC

DECEMBER 26, 2003

DOCUMENT NUMBER-DATE

13485 DEC 26 03

FPSC-COMMISSION CLERK

1 **INTRODUCTION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Steven E. Turner. My business address is Kaleo Consulting, 2031
4 Gold Leaf Parkway, Canton, Georgia 30114.

5 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?**

6 A. Yes. I filed direct testimony on December 4, 2003.

7 **Q. WHY ARE YOU FILING SUPPLEMENTAL DIRECT TESTIMONY?**

8 A. Since the filing of my direct testimony, I have identified certain errors in the DSO
9 Impairment tool. In order to correct these errors, on behalf of AT&T, I am filing
10 revised DSO Impairment results. The revised results are attached to my
11 supplemental testimony as Revised Exhibit SET-2, which is electronic format on
12 a CD-ROM.

13 **Q. ARE THE CORRECTIONS TO THE DSO IMPAIRMENT TOOL SET
14 FORTH IN DETAIL ANYWHERE?**

15 A. Yes. Exhibit SET-5, which attached to my supplemental testimony, details all of
16 the changes and corrections that were made to the DSO Impairment Tool and are
17 reflected in the market specific results contained in Revised Exhibit SET-2.

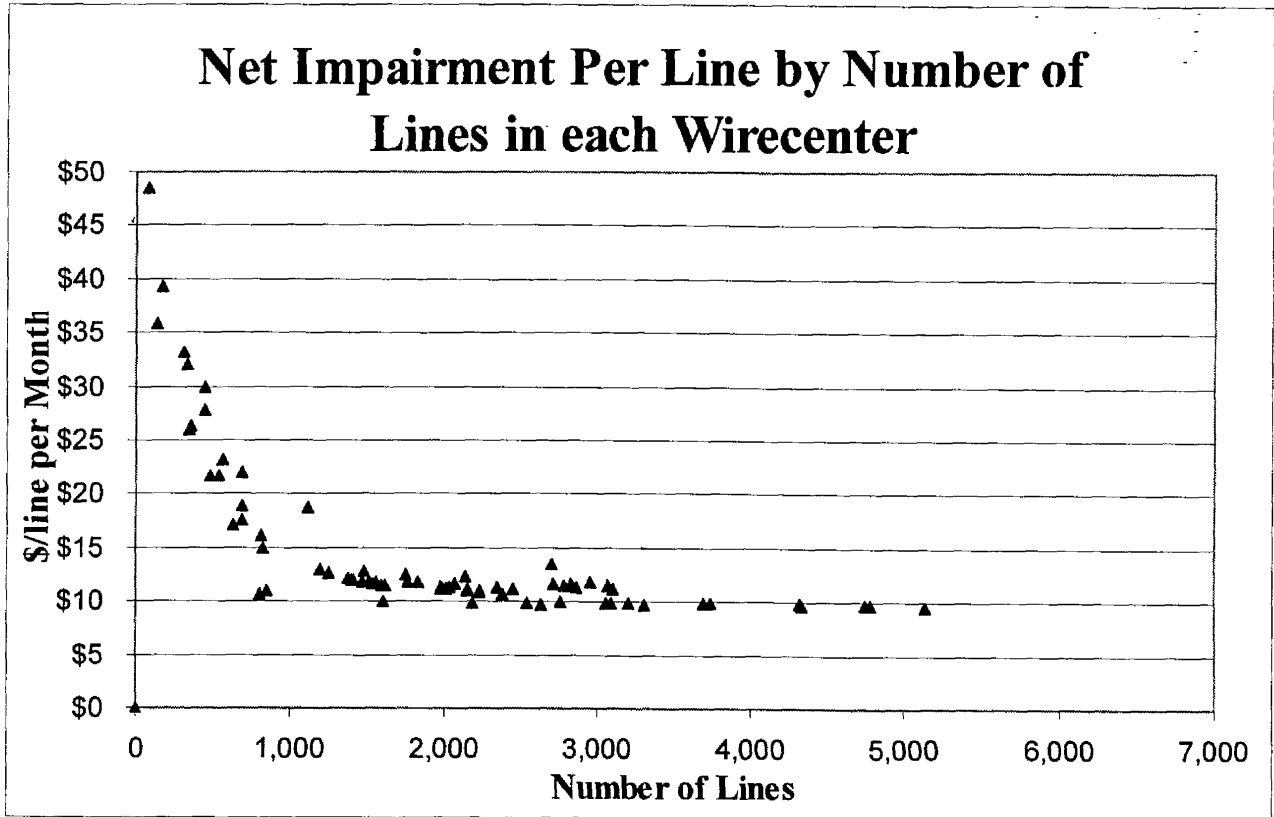
18 **Q. ARE THERE ANY OTHER CHANGES TO YOUR DIRECT TESTIMONY
19 AS A RESULT OF THE CORRECTIONS TO THE DSO IMPAIRMENT
20 TOOL?**

21 A. Yes. Page 17, Line 17 should be revised from \$22.94 to \$19.74. Page 17, Line
22 17 should be revised from \$12.79 to \$11.86. Page 44, Line 8 should be revised

1 from \$12.79 to \$11.86. Page 45, Line 4 should be revised from \$12.79 to \$11.86.

2 Finally, the chart on Page 45 should also be revised to that provided below.

3



4

5

6 **Q. ARE THERE ANY OTHER CHANGES THAT YOU NEED TO INDICATE**
7 **TO THE COMMISSION?**

8 A. Yes. Exhibit SET-2 to my direct testimony contained the Technical Appendix,
9 the electronic version of the DS0 Impairment Analysis Tools, the results by
10 LATA for BellSouth in Florida, the detailed runs of each LATA for BellSouth in
11 Florida, and the Input Portfolio on a CD-ROM. The results, the model itself, and
12 the Technical Appendix have changed based on the foregoing. As such, a

1 Revised Exhibit SET-2 is attached to my supplemental testimony that replaces the
2 previous CD-ROM.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A.** Yes it does.

CORRECTIONS TO THE DSO IMPAIRMENT TOOL

The DLC costs calculations were changed to adjust the DLC Common Power (peak) calculation for engineered DLC Capacity (i.e. fill), to include the range extension line card costs in the DLC investment and to correct the DLC Amp calculation to remove the duplicative division of 48 volts to the amps.

Collocation impairment related costs in the DS-0 and transport impairment tools were updated to exclude disconnect, include certain other cost drivers that were missing and move the leased fiber transport charges from the ds-0 to the transport tool because it is a transport related cost. In addition, the minimum power requirement for node locations was changed 300 amps to 200 amps and the DC peak load: average load conversion factor from .4 to 1 and the DC load amp:fuse amp conversion factor was changed from 1 to 1.5.

The hot cut charge data was revised to exclude the service order cost from the cost of additional lines.

The addressable business and residential lines were revised to correct an error inverting the business and residential line counts.

The transport (DS1/3) connectivity cost calculations were revised to include the node end of leased transport cross-connection costs.

The per foot fiber cost calculation was updated to exclude extra cable costs and the underground ACF calculation was corrected.

The cost per self provided DS3 calculation was revised to include the ring connector costs and revise the calculation methodology.

The cost of maintenance related to transport investment was divided by 12 to convert an annual maintenance expense factor to a monthly cost calculation.