

ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS, INC.

SURREBUTTAL TESTIMONY OF ANIRUDDHA (ANDY) BANERJEE, Ph.D.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 030852-TP

FEBRUARY 4, 2004

1 **I. INTRODUCTION AND PURPOSE**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT**
3 **POSITION.**

4
5 A. My name is Aniruddha (Andy) Banerjee. I am a Vice President at NERA Economic Consulting
6 located at One Main Street, Cambridge, Massachusetts 02142.

7
8 **Q. HAVE YOU FILED TESTIMONY PREVIOUSLY IN THIS PROCEEDING?**

9
10 A. Yes, I filed direct testimony (on December 22, 2003) and supplemental direct testimony (on
11 January 9, 2004) in this proceeding.

12 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

13 A. My surrebuttal testimony responds to specific allegations and claims of an economic nature by
14 witnesses for intervening parties, including Gary J. Ball on behalf of the Florida Competitive
15 Carriers Association ("FCCA"), Kent W. Dickerson on behalf of the Sprint/United Management
16 Company ("Sprint"), and James C. Falvey on behalf of Xspedius Communications LLC. In

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1 addition. I attach revised versions of two exhibits that were filed with my direct testimony on
2 December 22, 2003.

3 **II. REVISED EXHIBITS**

4 **Q. PLEASE EXPLAIN WHY YOU HAVE INCLUDED REVISED EXHIBITS FOR**
5 **CUSTOMER LOCATIONS AND ROUTES THAT SATISFY THE POTENTIAL**
6 **DEPLOYMENT TEST.**

7 A. There are two reasons. First, the revised exhibits reflect modified cost and other inputs to my
8 analysis of potential deployment as detailed in the surrebuttal testimony of A. Wayne Gray. Thus,
9 I have used revised network costs for the LGX and intra-building network cable and termination.
10 In addition, I have used the most updated set of fiber nodes, which incorporates additional
11 discovery responses. As I noted in my direct and supplemental direct testimonies, BellSouth
12 reserved the right to modify the locations and routes that qualify for unbundling based on
13 additional discovery.
14

15 The revised customer locations and inter-office routes that satisfy the potential deployment test
16 are presented in the attached Exhibits AXB-2 and AXB-3, which replace the prior versions of
17 these exhibits.
18

19 **III. RESPONSES TO OTHER PARTIES**

20 **Q. MR. DICKERSON ARGUES [AT 29-30] THAT BELLSOUTH'S POTENTIAL**
21 **DEPLOYMENT TEST OVERLOOKS THE "FACT" THAT CLECS' FAILURE THUS**
22 **FAR TO SERVE MORE CUSTOMER LOCATIONS CONTRADICTS**

1 **BELLSOUTH’S CONTENTION THAT CLECS COULD POTENTIALLY DEPLOY**
2 **LOOP FACILITIES AT THOSE LOCATIONS. DO YOU AGREE?**
3

4 A. No. The thrust of Mr. Dickerson’s argument is that serving the additional customer locations in
5 Florida identified by my potential deployment test cannot possibly be profitable simply because
6 CLECs have thus far avoided serving those locations. This argument, presented as “evidence”
7 that CLECs remain impaired and involuntarily precluded from serving certain customer locations,
8 cannot be taken as serious criticism of either the potential deployment test itself (as devised by the
9 FCC) or how I have conducted it. Contrary to what Mr. Dickerson appears to imply, the
10 potential deployment test is *not* a gauge or barometer of what a CLEC *would* do; rather, it is
11 intended to demonstrate what it *could* do. That is, the mere fact that CLECs have not *yet* made
12 the effort to serve certain customer locations cannot be considered dispositive evidence that they
13 would not do so at the “right” time. Again, for the potential deployment test for loops, it suffices
14 only to demonstrate that, given what we know about specific customer locations and the
15 circumstances that any carrier would face to serve them, at least two CLECs could profitably
16 serve each such location.
17

18 Mr. Dickerson offers several “practical” explanations for the current seeming CLEC
19 disinterest in the additional customer locations in Florida to which loop deployment could be
20 profitable according to my analysis. These include (1) non-availability of conduit space, (2) non-
21 availability of rights-of-way within a “reasonable timeframe,” (3) insufficient revenue potential, and
22 (4) infeasible cost recovery. A careful reading of my testimony would show that my potential
23 deployment analysis attempts to take into account all of these factors. In fact, I note in my direct
24 testimony that the FCC has specifically required that account be taken in the potential deployment
25 analysis of many of the factors cited by Mr. Dickerson.

1

2 In the ultimate analysis, I question the premise that CLECs are unlikely to have chosen
3 voluntarily to pass up profitable business opportunities presented by the customer locations that
4 are identified by my potential deployment test. Entry and expansion decisions by firms are
5 dictated by a variety of factors including the availability of alternative deployment strategies, the
6 appropriate scale of efficient operations relative to the level of available demand, access to capital
7 markets, and (frequently) the business models and objectives of those firms regarding the scope
8 and timing of their activities. In the environment in which CLECs operate in Florida, the
9 availability of unbundled network elements (“UNEs”) at regulated prices is likely to have an
10 important bearing on CLEC choices because the relative economics of leasing UNEs and
11 deploying owned facilities may well prompt CLECs to choose to expand through the use of
12 UNEs rather than by deploying their own facilities. As a result, although the presence of facilities
13 meeting the triggers test is evidence of non-impairment, the absence of such facilities *cannot* be
14 taken as evidence of impairment. The advantage of having a “potential deployment” test in
15 addition to the triggers is that this fact is properly recognized.

16

17 **Q. PLEASE EXPLAIN WHETHER YOUR POTENTIAL DEPLOYMENT ANALYSIS**
18 **TAKES ACCOUNT OF THE FACTORS THAT MR. DICKERSON IDENTIFIES AS**
19 **PRESENTING PRACTICAL CONSTRAINTS ON THE DEPLOYMENT OF LOOP**
20 **FACILITIES BY CLECS.**

21 A. The FCC’s *Triennial Review Order* specifies a set of nine factors each for the potential
22 deployment analysis of loop facilities (to serve customer locations) and transport facilities (to
23 serve inter-office routes), respectively. I detail below the manner in which I take those nine
24 factors or criteria into account.

1 Loops (see TRO ¶335 and Rules §51.319(a)(5)(ii), (6)(ii))

2 Factor 1 (*Evidence of alternative loop deployment at that location*)

3
4 I count actual loops deployed to the customer location towards the two carriers required to
5 show competitive supply. That is, if one actual carrier currently serves a location, a finding of
6 non-impairment would only require the demonstration that one more carrier could potentially
7 deploy facilities to that location. (Note that Mr. Dickerson is incorrect – and inconsistent with his
8 own argument – when he asserts (p.24) that two CLECs must both be potentially deploying,
9 thereby ignoring the evidence of actual loop deployment.)

10 Factors 2 to 5 (*Local engineering costs of building and utilizing transmission facilities;*
11 *the cost of underground or aerial laying of fiber or copper; the cost of equipment*
12 *needed for transmission; installation and other necessary costs involved in setting up*
13 *service*)

14
15 The costs of building the network to the customer location and setting up service are fully
16 considered in the analysis and are detailed in the direct and surrebuttal testimonies of BellSouth
17 witness A. Wayne Gray in this proceeding.

18
19 Factor 6 (*Local topography such as hills and rivers.*)

20 To determine the cost of deploying a fiber cable to a customer location, I use, as a reasonable
21 proxy, the conservative assumption that the fiber loop follows a right-angle path from the CLEC's
22 fiber node to the customer location. Because the locations for which potential deployment is

1 viable are located in urban commercial areas with few topography concerns, and since CLECs
2 already have fiber nodes relatively close to these locations, the right-angle methodology is a
3 conservative alternative that accounts for local topography. If anything, this methodology is likely
4 to over-estimate, rather than under-estimate, the distances over which CLECs have to deploy
5 their loops. Thus, my analysis is likely also to under-estimate the number of customer locations
6 that CLECs could serve profitably out of their own loops.

7 *Factor 7 (Availability of reasonable access to rights-of-way)*

8 Costs associated with rights-of-way are taken into account, as described in Mr. Gray's direct
9 and surrebuttal testimonies.

10 *Factor 8 (Building access restrictions/costs)*

11 Based on BellSouth's experience in deploying high-capacity services to commercial buildings,
12 few building access restrictions or costs constitute a material barrier to loop deployment.
13 Typically, building owners in BellSouth's service territory do not charge access fees and, in the
14 limited situations in which this occurs, such costs are passed directly on to end-user customers.

15 *Factor 9 (Availability/feasibility of similar quality/reliability alternative transmission*
16 *technologies at that particular location)*

17

18 Although the *Triennial Review Order* provides the flexibility to consider alternative transmission
19 technologies that may be more cost effective for particular customer locations, BellSouth has
20 chosen to model costs for a fiber-optics network architecture similar to the one it uses when
21 deploying loops to high-capacity buildings.

22 Transport (see TRO ¶410 and Rules §51.319(e)(2)(ii), (3)(ii))

1 Factors 1 to 4 (*Local engineering costs of building and utilizing transmission facilities;*
2 *the cost of underground or aerial laying of fiber or copper; the cost of equipment*
3 *needed for transmission; installation and other necessary costs involved in setting up*
4 *service)*

5 The costs of building the network and setting up service are fully considered and are described in
6 Mr. Gray's direct and surrebuttal testimonies.

7 Factor 5 (*Local topography such as hills and rivers*)

8 The transport analysis is similar to the loop analysis, which uses, as a proxy, the conservative
9 assumption that the fiber loop follows a right-angle path from the CLEC's fiber node to the wire
10 center. Because the wire centers involved are in urban commercial areas with few or no
11 topography concerns, and since CLECs already have fiber nodes relatively close to these wire
12 centers, this methodology is a conservative and reasonable method of satisfying the topography
13 aspect of the rule. Again, this methodology is likely to under-estimate the number of routes on
14 which CLEC deployment would be profitable.

15 Factor 6 (*Availability of reasonable access to rights-of-way*)

16 Costs associated with rights-of-way are taken into account, as described in Mr. Gray's direct
17 and surrebuttal testimonies.

18 Factor 7 (*Availability/feasibility of similar quality/reliability alternative transmission*
19 *technologies along the particular route*)

20 Although the *Triennial Review Order* provides the flexibility to consider alternative transmission
21 technologies that may be more cost effective for particular routes, BellSouth has chosen to model
22 costs for a fiber-optic network architecture similar to the one it uses when deploying interoffice
23 transport facilities.

1 Factor 8 (*Customer density or addressable market*)

2 My analysis of potential deployment of transport facilities uses a “build versus buy” decision
3 where the benefit of self-deployment for each CLEC is the savings achieved by not leasing
4 wholesale transport from BellSouth. Since I use the actual BellSouth revenues by CLEC for each
5 specific route in the analysis, this methodology reflects the actual revenues that each CLEC
6 obtains from the currently addressed market.

7 Factor 9 (*Existing facilities-based competition*)

8 As three carriers are required to meet the self-deployment trigger for transport, I assume the
9 same threshold for the potential case – that is, I demonstrate that, counting actual transport
10 facilities, a total of three carriers are required on a particular route to show competitive supply
11 (e.g., if one actual carrier currently has transport facilities along a route, a finding of non-
12 impairment would require the demonstration that two more carriers could potentially deploy
13 facilities on that route).

14
15 **Q. BEYOND THESE FCC-SPECIFIED FACTORS, DOES YOUR POTENTIAL**
16 **DEPLOYMENT ANALYSIS TAKE OTHER FACTORS INTO ACCOUNT, SUCH AS**
17 **CLECS’ ACCESS TO CAPITAL, AS SUGGESTED BY MR. FALVEY [AT 22]?**
18

19 A. No. Although Mr. Falvey asks this Commission to consider the “current limited access to capital
20 of CLECs,” I would urge that there be no expansion of the potential deployment test beyond the
21 factors specified by the FCC. The granularity achieved in such a test by following the FCC’s
22 instructions in the matter is significant enough. Granting Mr. Falvey’s request would open the
23 door to various other requests to expand and, in the process, unnecessarily complicate the test.
24 Besides, Mr. Falvey’s concern about limited access to capital is clearly less valid in today’s

1 capital market circumstances than it may have been some years ago. Moreover, the return on
2 equity, used to determine the cost of capital, takes in consideration the circumstance of the capital
3 market.
4

5 **Q. PLEASE RESPOND TO MR. DICKERSON'S SPECIFIC CONCERN [AT 28],**
6 **ECHOED BY MR. BALL [AT 57], THAT CUSTOMERS AT LOCATIONS TO**
7 **WHICH CLECS HAVE NOT DEPLOYED LOOP FACILITIES MAY BE TIED UP IN**
8 **MULTI-YEAR CONTRACTS WITH BELL SOUTH.**
9

10 A. Mr. Dickerson's concern in this respect is almost certainly exaggerated. While contracts are a
11 standard business arrangement that minimizes risk and raises the certainty of financial
12 commitments of buyers and sellers alike, there is no reason to believe—and neither Mr.
13 Dickerson nor any of the other parties provides any evidence—that BellSouth has employed such
14 contracts as an entry deterrent. Contracts are not of indefinite or unduly long durations, and they
15 probably do not run concurrently for every business customer in a building. That is, some of the
16 customers in a building may be in contracts that are likely to expire imminently or in the near term,
17 and opportunities for CLEC entry into the building may certainly exist for those customers.
18 Moreover, when CLECs signal an interest in bidding for a customer's *future* business, that
19 customer may itself be reluctant to sign long-term contracts that would effectively preclude it from
20 seeking alternatives to an incumbent carrier like BellSouth. Competitive pressures may increase
21 the prospects for a variety of contracts, including various shorter-term contracts designed to
22 entice customers away from the incumbent by offering specific advantages and incentives.
23

24 **Q. PLEASE COMMENT ON MR. BALL'S ASSERTION [AT 46], REPEATED BY MR.**

1 **DICKERSON [AT 42 AND 45], THAT BELLSOUTH'S DEMONSTRATION OF**
2 **POTENTIAL DEPLOYMENT BY THE REQUIRED NUMBER OF CLECS (TWO**
3 **FOR LOOPS, THREE FOR ROUTES) MUST BE *LOCATION-SPECIFIC*.**

4 A. That is exactly how I have conducted my potential deployment analysis. As the exhibits attached
5 to my direct testimony clearly show, *specific* customer locations and routes between pairs of
6 BellSouth central offices are identified as being profitable for the requisite number of CLECs to
7 serve. These locations and routes are actual and readily identifiable by their addresses or
8 latitude-longitude parameters. For *each* such location or route, my analysis examines the 10-year
9 net present value of CLEC entry, conditional on the nine factors that the FCC requires be taken
10 into account.

11
12 **Q. MR. BALL ALSO CONTENDS [AT 50] THAT THE POTENTIAL DEPLOYMENT**
13 **TEST MUST DEMONSTRATE THAT THE REVENUE AVAILABLE TO A CLEC**
14 **AT A PARTICULAR LOCATION MUST BE SUFFICIENT TO "OVERCOME THE**
15 **FIXED AND SUNK COSTS OF CONSTRUCTING A FACILITY AT THAT**
16 **LOCATION." DOES YOUR ANALYSIS MAKE THAT DEMONSTRATION?**

17 A. Yes. In fact, my analysis is even more comprehensive than that suggested by Mr. Ball. The
18 revenues available to CLECs must be shown to compensate them not only for their fixed and
19 sunk costs but also for all of the variable operational costs associated with a 10-year period of
20 operation. The revenue assumptions are developed carefully by reference to expert reports on
21 actual CLEC experiences in the marketplace. Again, because the burden carried by the potential
22 deployment test is only to demonstrate that the CLEC *could* earn enough revenues to recover its
23 various costs, it is not necessary to prove somehow that actual CLEC deployments would occur.
24 My analysis and the assumptions on which it rests are consistent with that predicate.

25

1 **Q. PLEASE PROVIDE AN EXAMPLE OF YOUR USE OF ACTUAL CLEC**
2 **EXPERIENCE IN THE MARKETPLACE TO MAKE ASSUMPTIONS ABOUT**
3 **REVENUE IN YOUR POTENTIAL DEPLOYMENT ANALYSIS.**

4 A. One important example is the assumption that each of the two potential CLECs serving a new
5 building would have 15% of the revenue available from that building (note that Mr. Dickerson is
6 incorrect when he asserts that my analysis “fails to take into account” that 2 CLECs must share
7 the revenue (p.32)). The basis for this assumption is provided by three specific market reports
8 that document revenue shares achieved by CLECs serving business customers. These are (1)
9 “Teligent, Inc. Initial Report” by Ferris Baker Watts, September 21, 2000, (2) “Winstar
10 Communications, Inc. Initial Report” by Ferris Baker Watts, January 26, 2001, and (3)
11 “Broadband 2001” by McKinsey & Company and J.P. Morgan, April 2, 2001.
12

13 **Q. HOW DO YOU RECONCILE YOUR ASSUMPTION THAT TWO CLECS CAN**
14 **EACH GAIN A 15% REVENUE SHARE IN A BUILDING WITH THE POSSIBILITY**
15 **(CITED BY MR. DICKERSON) THAT CUSTOMERS MAY BE TIED UP IN LONG-**
16 **TERM CONTRACTS WITH THEIR CURRENT SUPPLIERS?**

17 A. This is a reasonable assumption because, when selecting buildings from the TNS Telecoms
18 database, all the buildings with fewer than three tenants are first removed from consideration,
19 leaving only buildings with a large enough pool of potential customers to be targeted by CLECs.
20 Also, customers in the enterprise market typically have multiple telecommunications suppliers in
21 order to negotiate better contracts and to obtain redundancy to protect against network failures.
22 This multiple supplier environment, together with the filter on number of tenants per building,
23 assures that opportunities exist for CLECs to gain market share in a building.
24

1 **Q. PLEASE RESPOND TO MR. DICKERSON’S ASSERTION [AT 31] THAT THE**
2 **ASSUMPTION THAT “\$60,000 IS SUFFICIENT ANNUAL REVENUE TO JUSTIFY**
3 **BUILDING FIBER INTO ALL 421 IDENTIFIED LOCATIONS”**
4 **UNDERESTIMATES SIGNIFICANTLY THE REVENUE THAT WOULD**
5 **ACTUALLY BE NEEDED.**

6 A. The basis for Mr. Dickerson’s assertion appears to be his mistaken belief that my analysis
7 regards any building with \$60,000 in annual revenue as suitable for facilities deployment. Nothing
8 could be farther from the actual, building-by-building analysis that I performed, and I suspect this
9 fundamental misunderstanding may be at the root of many of Mr. Dickerson’s other, equally
10 incorrect observations about my methodology. In fact, I use the \$60,000 annual (equivalently,
11 \$5,000 monthly) revenue figure merely as an initial filter that conservatively reduces the number of
12 buildings considered in the potential deployment analysis to a manageable level by eliminating any
13 that are below this threshold (even though they may have met the potential deployment test). For
14 example, use of this filter reduces the number of candidate buildings in Florida from more than
15 200,000 to approximately 7,000.

16
17 Mr. Dickerson also asserts [at 33-34] that the annual revenue available from a building ought
18 to be at least \$240,000, rather than the \$60,000 I have chosen for my filter. This assertion,
19 again, stems from a misunderstanding of my purpose in using the \$60,000 annual revenue filter.
20 Moreover, it is based on a number of other assumptions that need not apply to my analysis. For
21 example, Mr. Dickerson computes his \$240,000 minimum annual revenue requirement on the
22 assumption that the two CLECs that potentially deploy their own loops would account for 50%
23 of the revenue available from a building. My analysis makes the more conservative assumption,
24 based on actual CLEC experience, that the collective share of the two equally sized CLECs
25 would be approximately 30%. Second, Mr. Dickerson cites CLEC market share estimates

1 (available from independent market research firms) that, if read Mr. Dickerson's way, would
2 appear to cast doubt on either the collective 30% share assumption in my analysis or even the
3 more extreme 50% share assumption. Mr. Dickerson does not explain why the 14.6% CLEC
4 share of private line revenue may match its likely revenue share from serving a building occupied
5 by small and medium business customers. Furthermore, in selectively reporting the 13.2% CLEC
6 share of "entire telecommunications market," Mr. Dickerson does not explain why that statistic
7 represents the CLEC share of the *enterprise* market.¹ Finally, Mr. Dickerson does not explain
8 that any nationwide or region wide CLEC share (averaged over a larger base that includes
9 buildings not served by CLEC) is necessarily lower than the CLEC shares of the telecom spend
10 in buildings that CLECs actually serve over their own facilities.

11
12 **Q. GIVEN THE CRITICISMS OF YOUR ANALYSIS (IN PARTICULAR, MR. BALL'S**
13 **ASSERTION [AT 65] THAT YOU RELY ON "HYPOTHETICAL COST"**
14 **ASSUMPTIONS), PLEASE EXPLAIN HOW YOU ENSURED THAT THE INPUTS IN**
15 **YOUR ANALYSIS ARE REASONABLE.**

16 A. As I explained earlier, my analysis makes every effort to conform to the nine FCC-specified
17 factors for both loops and transport facilities. Beyond the investment cost associated with loops
18 and associated equipment, I also include two categories of cost: "COGS and other network
19 cost," and SG&A:

¹ Mr. Dickerson does not mention whether that share is of access lines served or revenues earned. If it is the access-line share then, given that CLECs seek out the most lucrative business customers, a 13.2% line share may well translate into a considerably higher revenue share. FCC statistics show that CLECs account for over 23% of access lines sold to enterprise market customers nationwide. See FCC, *Local Telephone Competition: Status as of June 30, 2003*, Wireline Competition Bureau, December 2003, Table 2. Moreover, in Florida, there is reason to believe that CLECs serve over 34% of business customers in BellSouth's service territory in Florida. See Revised Direct Testimony of John A. Ruscilli, on behalf of BellSouth Telecommunications, Florida Public Service Commission Docket No. 030869-TL, September 23, 2003, at 14.

- 1 1. “COGS and other network cost” includes all network-related expenses beyond the cost of the
2 loop, including any potential capacity upgrades to the CLEC’s existing network that would be
3 necessary to provide retail services to *new* customer locations. For example, this category of
4 cost includes the cost of voice switches (both operating expenses and depreciation), switched
5 access and other interconnection costs, various transport, transit, and peering costs, cost of
6 data network equipment, etc.
- 7 2. “SG&A” includes all CLEC expenses, including sales and marketing, billing, customer care,
8 and overhead expenses.

9 These categories are more than sufficient to account for CLECs’ expenses. The basis for these
10 inputs is detailed in the testimony of BellSouth witness Debra Aron in Docket No. 030851-TP.

11 The expenses in the two categories above, which are based on actual CLEC experiences,
12 amount to more than 50% of retail revenue. In addition, contrary to Mr. Dickerson’s stated
13 apprehension [at 41], sales and marketing expenses are adjusted for assumed annual rates of
14 churn as well as other gross customer additions.

15 With respect to the cost of capital that I use, which is commented on by both Mr. Ball (at p.54)
16 and Mr. Dickerson (at p.42), I defer to the testimonies of Dr. Billingsley in the switching case
17 (030851-TP), where it is explained and defended against the critiques of Dr. Stalhr that Mr.
18 Dickerson cites.

19

20 Finally, Mr. Dickerson’s claim [at 41] that the assumed amortization period of 10 years in my
21 analysis “is entirely too long to assume a customer would subscribe to competitive services”
22 confuses two different issues.² My analysis makes no assumption regarding the length of time a

² Mr. Ball displays the same confusion [at 61]. His suggestion for evaluating the net present of value over five years makes little sense from the perspective of a CLEC that wishes to make an investment for the long haul,

1 CLEC would be able to serve a given customer. Rather, it only assumes that the CLEC
2 evaluates the net present value of its entry into a building occupied by multiple business customers
3 over a 10-year period, a standard time period in financial analysis (and used, e.g., in the model
4 that Mr. Ball attaches to his testimony as Exhibit GJB-3 which amortizes costs over 10.24 years,
5 and in the cost model filed by AT&T in the switching proceeding before this commission). Over
6 this period, the CLEC may end up serving different customers or even several customers at a
7 time. All that matters is that, on average, it be able to secure at least 15% of the revenue
8 available from the building as a whole.

9 **Q. MR. BALL SUGGESTS [AT 57] THAT YOUR POTENTIAL DEPLOYMENT TEST**
10 **FOR LOOPS IS DEFICIENT IN THAT IT DOES NOT CONSIDER THE SAME**
11 **“BUY OR BUILD” DECISION THAT IS PART OF YOUR POTENTIAL**
12 **DEPLOYMENT TEST FOR TRANSPORT FACILITIES. DO YOU AGREE?**

13 A. No. There is a fundamental difference between the two situations. Loops deployed to business
14 customer locations in buildings are part of a retail facilities-based local exchange service, the
15 revenue from which accrues in the form of spending on that service by end-user business
16 customers. With such a retail service, no “build or buy” decision is involved. That is, I do *not*
17 consider the circumstance of a CLEC that is currently running a special access line obtained from
18 BellSouth into a customer location and has the option to replace that line with its own facilities.
19 Rather, my analysis focuses on buildings that are presently not served *by any means* by the
20 CLEC and asks under what revenue and cost circumstances would up to two CLECs find it
21 profitable to deploy their own loops into those buildings.

(...continued)

particularly given that many of its upfront costs are likely to be sunk.

1 On the other hand, transport is a wholesale service where the CLEC has a choice of
2 deploying either its own facilities or purchasing/leasing them from the ILEC. The “revenue” in this
3 instance is the cost saved from the forgone option.
4

5 **Q. MR. BALL SUGGESTS [AT 62] THAT AN AT&T STUDY THAT HE INCLUDES**
6 **WITH HIS TESTIMONY “PRESENTS A MORE REALISTIC DEPICTION OF THE**
7 **COSTS AND NECESSARY REVENUES FOR A CLEC TO EXTEND ITS**
8 **NETWORK INTO A NEW BUILDING.” PLEASE COMMENT.**

9 A. This study is irrelevant for the potential deployment test as defined in the *Triennial Review*
10 *Order*. First, almost everything in AT&T’s study (including distances and prices of wholesale
11 alternatives) appears to reflect national averages for AT&T’s network, rather than the specific
12 conditions that prevail for the buildings in Florida in my analysis. Second, the AT&T study is a
13 buy-versus-build analysis for loops and, therefore, not suitable for the potential deployment test
14 required by the *Triennial Review Order*. As explained above, just because it may be more
15 profitable to purchase UNEs or special access service from the ILEC does not mean a CLEC
16 could not profitably deploy its own facilities to a building. In summary, even if the inputs in the
17 AT&T study are accurate (a matter I have not investigated), the study itself is non-granular,
18 contrary to the FCC’s requirements. The AT&T study does not address whether a CLEC could
19 profitably deploy its own facilities to provide retail services at various customer locations. It is,
20 therefore, irrelevant to the purposes of the building-specific analysis defined by the FCC in the
21 *Triennial Review Order*.
22

23 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

24 A. Yes.

Exhibit AXB-2: Customer locations that meet the criteria for potential deployment of high-capacity loop facilities

Index	Address	City
1	120 E PALMETTO PARK RD	BOCA RATON
2	1200 N FEDERAL HWY	BOCA RATON
3	150 E PALMETTO PARK RD	BOCA RATON
4	1515 N FEDERAL HWY	BOCA RATON
5	1515 S FEDERAL HWY	BOCA RATON
6	2381 NW EXECUTIVE CENTER DR	BOCA RATON
7	301 NE 51ST ST	BOCA RATON
8	4800 N FEDERAL HWY	BOCA RATON
9	501 E CAMINO REAL	BOCA RATON
10	5030 CHAMPION BLVD	BOCA RATON
11	5201 CONGRESS AVE	BOCA RATON
12	5900 BROKEN SOUND PKWY NW	BOCA RATON
13	6111 BROKEN SOUND PKWY NW	BOCA RATON
14	621 NW 53RD ST	BOCA RATON
15	6400 CONGRESS AVE	BOCA RATON
16	777 NW 51ST ST	BOCA RATON
17	791 PARK OF COMMERCE BLVD	BOCA RATON
18	800 MEADOWS RD	BOCA RATON
19	900 BROKEN SOUND PKWY NW	BOCA RATON
20	901 NW 51ST ST	BOCA RATON
21	902 CLINT MOORE RD	BOCA RATON
22	925 S FEDERAL HWY	BOCA RATON
23	951 BROKEN SOUND PKWY NW	BOCA RATON
24	999 NW 51ST ST	BOCA RATON
25	1 ALHAMBRA PLZ	CORAL GABLES
26	1320 S DIXIE HWY	CORAL GABLES
27	150 ALHAMBRA CIR	CORAL GABLES
28	2 ALHAMBRA PLZ	CORAL GABLES
29	2100 PONCE DE LEON BLVD	CORAL GABLES
30	2121 PONCE DE LEON BLVD	CORAL GABLES
31	220 ALHAMBRA CIR	CORAL GABLES
32	2333 PONCE DE LEON BLVD	CORAL GABLES
33	2511 PONCE DE LEON BLVD	CORAL GABLES
34	255 ALHAMBRA CIR	CORAL GABLES
35	2600 S DOUGLAS RD	CORAL GABLES
36	2655 LEJEJUNE RD	CORAL GABLES
37	2800 PONCE DE LEON BLVD	CORAL GABLES
38	2801 PONCE DE LEON BLVD	CORAL GABLES
39	3191 CORAL WAY	CORAL GABLES
40	355 ALHAMBRA CIR	CORAL GABLES
41	55 ALHAMBRA PLZ	CORAL GABLES
42	550 BILTMORE WAY	CORAL GABLES
43	75 VALENCIA AVE	CORAL GABLES
44	901 PONCE DE LEON BLVD	CORAL GABLES
45	95 MERRICK WAY	CORAL GABLES
46	999 PNCE DE LN BVD	CORAL GABLES
47	3111 N UNIVERSITY DR	CORAL SPRINGS

48	3300 N UNIVERSITY DR	CORAL SPRINGS
49	1700 W INTERNATIONAL SPEEDWAY BLVD	DAYTONA BEACH
50	800 FAIRWAY DR	DEERFIELD BEACH
51	100 E LINTON BLVD	DELRAY BEACH
52	190 CONGRESS PARK DR	DELRAY BEACH
53	1 E BROWARD BLVD	FORT LAUDERDALE
54	1 FINANCIAL PLZ	FORT LAUDERDALE
55	100 N ANDREWS AVE	FORT LAUDERDALE
56	100 W CYPRESS CREEK RD	FORT LAUDERDALE
57	101 NE 3RD AVE	FORT LAUDERDALE
58	110 E BROWARD BLVD	FORT LAUDERDALE
59	1500 W CYPRESS CREEK RD	FORT LAUDERDALE
60	1600 W COMMERCIAL BLVD	FORT LAUDERDALE
61	1801 S PERIMETER RD	FORT LAUDERDALE
62	200 E BROWARD BLVD	FORT LAUDERDALE
63	200 E LAS OLAS BLVD	FORT LAUDERDALE
64	200 S ANDREWS AVE	FORT LAUDERDALE
65	2050 SPECTRUM BLVD	FORT LAUDERDALE
66	2455 E SUNRISE BLVD	FORT LAUDERDALE
67	301 E LAS OLAS BLVD	FORT LAUDERDALE
68	3045 N FEDERAL HWY	FORT LAUDERDALE
69	3200 N FEDERAL HWY	FORT LAUDERDALE
70	350 E LAS OLAS BLVD	FORT LAUDERDALE
71	450 E LAS OLAS BLVD	FORT LAUDERDALE
72	4725 N FEDERAL HWY	FORT LAUDERDALE
73	4850 EEST OKLANDJ PK BLVD	FORT LAUDERDALE
74	4901 NW 17TH WAY	FORT LAUDERDALE
75	501 E LAS OLAS BLVD	FORT LAUDERDALE
76	5100 NW 33RD AVE	FORT LAUDERDALE
77	515 E LAS OLAS BLVD	FORT LAUDERDALE
78	5900 N ANDREWS AVE	FORT LAUDERDALE
79	6600 N ANDREWS AVE	FORT LAUDERDALE
80	777 AMERICAN EXPRESS WAY	FORT LAUDERDALE
81	1250 E HALLANDALE	HALLANDALE
82	1920 E HALLANDALE BEACH BLVD	HALLANDALE BEACH
83	2500 E HALLANDALE BEACH BLVD	HALLANDALE BEACH
84	7150 W 20TH AVE	HIALEAH
85	2600 HOLLYWOOD BLVD	HOLLYWOOD
86	4000 HOLLYWOOD BLVD	HOLLYWOOD
87	6100 HOLLYWOOD BLVD	HOLLYWOOD
88	1 RIVERSIDE AVE	JACKSONVILLE
89	10151 DEERWOOD PARK BLVD	JACKSONVILLE
90	10201 CENTURION PKWY N	JACKSONVILLE
91	10550 DEERWOOD PARK BLVD	JACKSONVILLE
92	117 W DUVAL ST	JACKSONVILLE
93	11700 CENTRAL PKWY	JACKSONVILLE
94	1200 RIVERPLACE BLVD	JACKSONVILLE
95	200 W FORSYTH ST	JACKSONVILLE
96	21 W CHURCH ST	JACKSONVILLE
97	225 WATER ST	JACKSONVILLE
98	330 E BAY ST	JACKSONVILLE
99	3599 UNIVERSITY BLVD S	JACKSONVILLE

100	3728 PHILLIPS HWY	JACKSONVILLE
101	400 W BAY ST	JACKSONVILLE
102	4190 BELFORT RD	JACKSONVILLE
103	4201 BELFORT RD	JACKSONVILLE
104	4345 SOUTHPOINT BLVD	JACKSONVILLE
105	4600 TOUCHTON RD E	JACKSONVILLE
106	50 N LAURA ST	JACKSONVILLE
107	500 WATER ST	JACKSONVILLE
108	5210 BELFORT RD	JACKSONVILLE
109	532 RIVERSIDE AVE	JACKSONVILLE
110	580 W 8TH ST	JACKSONVILLE
111	601 II RIVERSIDE AVE	JACKSONVILLE
112	655 W 8TH ST	JACKSONVILLE
113	6620 SOUTHPOINT DR S	JACKSONVILLE
114	6622 SOUTHPOINT DR S	JACKSONVILLE
115	7800 BELFORT PKWY	JACKSONVILLE
116	800 PRUDENTIAL DR	JACKSONVILLE
117	8100 NATIONS WAY	JACKSONVILLE
118	8130 BAYMEADOWS WAY W	JACKSONVILLE
119	815 S MAIN ST	JACKSONVILLE
120	836 PRUDENTIAL DR	JACKSONVILLE
121	8619 WESTERN WAY	JACKSONVILLE
122	9428 BAYMEADOWS RD	JACKSONVILLE
123	9487 REGENCY SQUARE BLVD	JACKSONVILLE
124	1001 N US HIGHWAY 1	JUPITER
125	1000 AAA DR	LAKE MARY
126	2950 LAKE EMMA RD	LAKE MARY
127	300 INTERNATIONAL PKWY	LAKE MARY
128	615 CRCNCE EXEC CT	LAKE MARY
129	3383 N STATE ROAD 7	LAUDERDALE LAKES
130	5000 W OAKLAND PARK BLVD	LAUDERDALE LAKES
131	5259 COCONUT CREEK PKWY	MARGATE
132	100 RIALTO PL	MELBOURNE
133	1025 W NASA BLVD	MELBOURNE
134	1700 W NEW HAVEN AVE	MELBOURNE
135	1900 S HARBOR CITY BLVD	MELBOURNE
136	777 E MERRITT ISLAND CSWY	MERRITT ISLAND
137	1 BISCAYNE BLVD	MIAMI
138	1000 BRICKELL AVE	MIAMI
139	10300 SW 72ND ST	MIAMI
140	1050 CARIBBEAN WAY	MIAMI
141	1080 CARIBBEAN WAY	MIAMI
142	10800 BISCAYNE BLVD	MIAMI
143	1110 BRICKELL AVE	MIAMI
144	1111 BRICKELL AVE	MIAMI
145	1111 PARK CENTRE BLVD	MIAMI
146	11401 NW 12TH ST	MIAMI
147	1150 NW 72ND AVE	MIAMI
148	1200 BRICKELL AVE	MIAMI
149	1201 NW 16TH ST	MIAMI
150	14 NE 1ST AVE	MIAMI
151	140 W FLAGLER ST	MIAMI

152	1401 BRICKELL AVE	MIAMI
153	1450 NE 2ND AVE	MIAMI
154	1455 NW 107TH AVE	MIAMI
155	1475 NW 12TH AVE	MIAMI
156	150 W FLAGLER ST	MIAMI
157	1500 BISCAYNE BLVD	MIAMI
158	169 E FLAGLER ST	MIAMI
159	1717 N BAYSHORE DR	MIAMI
160	175 NW 1ST AVE	MIAMI
161	19 W FLAGLER ST	MIAMI
162	1900 NW 92ND AVE	MIAMI
163	19495 BISCAYNE BLVD	MIAMI
164	19501 BISCAYNE BLVD	MIAMI
165	22ND ST	MIAMI
166	25 SE 2ND AVE	MIAMI
167	25 W FLAGLER ST	MIAMI
168	2655 S LE JEUNE RD	MIAMI
169	2875 NE 191ST ST	MIAMI
170	300 BISCAYNE BLVDWY	MIAMI
171	300 NE 2ND AVE	MIAMI
172	330 BISCAYNE BLVD	MIAMI
173	36 NE 1ST ST	MIAMI
174	3655 NW 87TH AVE	MIAMI
175	3661 S MIAMI AVE	MIAMI
176	3663 S MIAMI AVE	MIAMI
177	3750 NW 87TH AVE	MIAMI
178	3900 NW 79TH AVE	MIAMI
179	3915 BISCAYNE BLVD	MIAMI
180	400 NW 2ND AVE	MIAMI
181	401 BISCAYNE BLVD	MIAMI
182	401 NW 2ND AVE	MIAMI
183	44 W FLAGLER ST	MIAMI
184	4400 BISCAYNE BLVD	MIAMI
185	4400 NW 87TH AVE	MIAMI
186	444 BRICKELL AVE	MIAMI
187	444 SW 2ND AVE	MIAMI
188	48 E FLAGLER ST	MIAMI
189	501 BRICKELL KEY DR	MIAMI
190	51 SW 1ST AVE	MIAMI
191	5301 BLUE LAGOON DR	MIAMI
192	5600 NW 36TH AVE	MIAMI
193	600 BRICKELL AVE	MIAMI
194	601 BRICKELL KEY DR	MIAMI
195	6701 NW 7TH ST	MIAMI
196	700 BRICKELL AVE	MIAMI
197	701 NW 62ND AVE	MIAMI
198	7220 NW 36TH ST	MIAMI
199	7270 NW 12TH ST	MIAMI
200	73 W FLAGLER ST	MIAMI
201	7665 NW 19TH ST	MIAMI
202	777 BRICKELL AVE	MIAMI
203	777 NW 72ND AVE	MIAMI

204	7795 W FLAGLER ST	MIAMI
205	780 NW 42ND AVE	MIAMI
206	799 BRICKELL PLZ	MIAMI
207	80 SW 8TH ST	MIAMI
208	800 BRICKELL AVE	MIAMI
209	8052 NW 14TH ST	MIAMI
210	8181 NW 36TH ST	MIAMI
211	8200 NW 52ND TER	MIAMI
212	8249 NW 36TH ST	MIAMI
213	8300 W FLAGLER ST	MIAMI
214	848 BRICKELL AVE	MIAMI
215	8888 SW 136TH ST	MIAMI
216	8900 N KENDALL DR	MIAMI
217	909 SE 1ST AVE	MIAMI
218	9100 NW 36TH ST	MIAMI
219	9250 NW 36TH ST	MIAMI
220	9688 SW 24TH ST	MIAMI
221	999 BRICKELL AVE	MIAMI
222	1175 NE 125TH ST	NORTH MIAMI
223	11900 BISCAYNE BLVD	NORTH MIAMI
224	12000 BISCAYNE BLVD	NORTH MIAMI
225	12550 BISCAYNE BLVD	NORTH MIAMI
226	700 UNIVERSE BLVD	NORTH PALM BEACH
227	5757 N DIXIE HWY	OAKLAND PARK
228	100 E PINE ST	ORLANDO
229	1000 LEGION PL	ORLANDO
230	10401 POST OFFICE BLVD	ORLANDO
231	109 E CHURCH ST	ORLANDO
232	111 N ORANGE AVE	ORLANDO
233	135 W CENTRAL BLVD	ORLANDO
234	1414 KUHL AVE	ORLANDO
235	20 N ORANGE AVE	ORLANDO
236	200 E ROBINSON ST	ORLANDO
237	201 S ROSALIND AVE	ORLANDO
238	225 E ROBINSON ST	ORLANDO
239	300 S ORANGE AVE	ORLANDO
240	301 E PINE ST	ORLANDO
241	315 E ROBINSON ST	ORLANDO
242	3201 E COLONIAL DR	ORLANDO
243	324 W GORE ST	ORLANDO
244	37 N ORANGE AVE	ORLANDO
245	400 S ORANGE AVE	ORLANDO
246	400 W ROBINSON ST	ORLANDO
247	445 W AMELIA ST	ORLANDO
248	4950 L B MCLEOD RD	ORLANDO
249	500 S ORANGE AVE	ORLANDO
250	5401 W OAK RIDGE RD	ORLANDO
251	5601 WINDHOVER DR	ORLANDO
252	5728 MAJOR BLVD	ORLANDO
253	6220 S ORANGE BLOSSOM TRL	ORLANDO
254	6277 SEA HARBOR DR	ORLANDO
255	633 N ORANGE AVE	ORLANDO

256	7680 UNIVERSAL BLVD	ORLANDO
257	801 N MAGNOLIA AVE	ORLANDO
258	8427 S PARK CIR	ORLANDO
259	9333 S JOHN YOUNG PKWY	ORLANDO
260	2400 PALM BAY RD NE	PALM BAY
261	1 S COUNTY RD	PALM BEACH
262	2401 PGA BLVD	PALM BEACH GARDENS
263	3101 PGA BLVD	PALM BEACH GARDENS
264	3360 BURNS RD	PALM BEACH GARDENS
265	3801 PGA BLVD	PALM BEACH GARDENS
266	3920 RCA BLVD	PALM BEACH GARDENS
267	4200 WACKENHUT DR	PALM BEACH GARDENS
268	4500 PGA BLVD	PALM BEACH GARDENS
269	9050 PINES BLVD	PEMBROKE PINES
270	1000 W MORENO ST	PENSACOLA
271	101 E ROMANA ST	PENSACOLA
272	1717 N E ST	PENSACOLA
273	4400 BAYOU BLVD	PENSACOLA
274	5151 N 9TH AVE	PENSACOLA
275	7171 N DAVIS HWY	PENSACOLA
276	8333 N DAVIS HWY	PENSACOLA
277	8383 N DAVIS HWY	PENSACOLA
278	1 N UNIVERSITY DR	PLANTATION
279	1200 S PINE ISLAND RD	PLANTATION
280	300 NW 82ND AVE	PLANTATION
281	2900 W SAMPLE RD	POMPANO BEACH
282	4100 N POWERLINE RD	POMPANO BEACH
283	110 LONGWOOD AVE	ROCKLEDGE
284	40 ORANGE ST	SAINT AUGUSTINE
285	5701 SUNSET DR	SOUTH MIAMI
286	6200 SW 73RD ST	SOUTH MIAMI
287	6262 SUNSET DR	SOUTH MIAMI
288	1000 SAWGRASS CORPORATE PKWY	SUNRISE
289	1500 CONCORD TER	SUNRISE
290	1580 SAWGRASS CORPORATE PKWY	SUNRISE
291	1 N CLEMATIS ST	WEST PALM BEACH
292	1100 NORTHPOINT PKWY	WEST PALM BEACH
293	1309 N FLAGLER DR	WEST PALM BEACH
294	1400 CENTREPARK BLVD	WEST PALM BEACH
295	1555 PALM BEACH LAKES BLVD	WEST PALM BEACH
296	1601 BELVEDERE RD	WEST PALM BEACH
297	1675 PALM BEACH LAKES BLVD	WEST PALM BEACH
298	224 DATURA ST	WEST PALM BEACH
299	250 S AUSTRALIAN AVE	WEST PALM BEACH
300	2751 S DIXIE HWY	WEST PALM BEACH
301	301 CLEMATIS ST	WEST PALM BEACH
302	301 N OLIVE AVE	WEST PALM BEACH
303	3111 S DIXIE HWY	WEST PALM BEACH
304	3228 GUN CLUB RD	WEST PALM BEACH
305	500 S AUSTRALIAN AVE	WEST PALM BEACH
306	505 S FLAGLER DR	WEST PALM BEACH
307	515 N FLAGLER DR	WEST PALM BEACH

308
309

801 CLEMATIS ST
901 45TH ST

WEST PALM BEACH
WEST PALM BEACH

Exhibit AXB-3: Routes between BellSouth wire centers in the same LATA that meet the criteria for potential deployment of transport facilities

Index	CLLI 1	CLLI 2	LATA
1	DYBHFLMA	DYBHFLOB	DAYTONA BEACH
2	DYBHFLMA	DYBHFLOP	DAYTONA BEACH
3	DYBHFLOB	DYBHFLOP	DAYTONA BEACH
4	JCBHFLMA	JCVLFLBW	JACKSONVILLE
5	JCBHFLMA	JCVLFLCL	JACKSONVILLE
6	JCBHFLMA	JCVLFLSM	JACKSONVILLE
7	JCBHFLMA	MNDRFLAV	JACKSONVILLE
8	JCBHFLMA	MNDRFLLO	JACKSONVILLE
9	JCVLFLBW	JCVLFLNO	JACKSONVILLE
10	JCVLFLBW	JCVLFLRV	JACKSONVILLE
11	JCVLFLBW	JCVLFLWC	JACKSONVILLE
12	JCVLFLCL	JCVLFLNO	JACKSONVILLE
13	JCVLFLCL	JCVLFLRV	JACKSONVILLE
14	JCVLFLCL	JCVLFLWC	JACKSONVILLE
15	JCVLFLNO	JCVLFLRV	JACKSONVILLE
16	JCVLFLNO	JCVLFLWC	JACKSONVILLE
17	JCVLFLNO	MNDRFLAV	JACKSONVILLE
18	JCVLFLNO	MNDRFLLO	JACKSONVILLE
19	JCVLFLRV	JCVLFLSM	JACKSONVILLE
20	JCVLFLRV	JCVLFLWC	JACKSONVILLE
21	JCVLFLRV	MNDRFLAV	JACKSONVILLE
22	JCVLFLRV	MNDRFLLO	JACKSONVILLE
23	JCVLFLSM	JCVLFLWC	JACKSONVILLE
24	JCVLFLWC	MNDRFLAV	JACKSONVILLE
25	JCVLFLWC	MNDRFLLO	JACKSONVILLE
26	BCRTFLBT	FTLDFLCR	SOUTHEAST
27	BCRTFLBT	FTLDFLSG	SOUTHEAST
28	BCRTFLBT	JPTRFLMA	SOUTHEAST
29	BCRTFLBT	MIAMFLAP	SOUTHEAST
30	BCRTFLBT	MIAMFLBA	SOUTHEAST
31	BCRTFLBT	MIAMFLFL	SOUTHEAST
32	BCRTFLBT	MIAMFLNM	SOUTHEAST
33	BCRTFLBT	PMBHFLCS	SOUTHEAST
34	BCRTFLBT	PRRNFLMA	SOUTHEAST
35	BCRTFLBT	WPBHFLLE	SOUTHEAST
36	BCRTFLMA	DLBHFLKP	SOUTHEAST
37	BCRTFLMA	FTLDFLSG	SOUTHEAST
38	BCRTFLMA	JPTRFLMA	SOUTHEAST
39	BCRTFLMA	MIAMFLAP	SOUTHEAST
40	BCRTFLMA	MIAMFLBA	SOUTHEAST
41	BCRTFLMA	MIAMFLFL	SOUTHEAST
42	BCRTFLMA	MIAMFLNM	SOUTHEAST
43	BCRTFLMA	PMBHFLCS	SOUTHEAST
44	BCRTFLMA	PRRNFLMA	SOUTHEAST
45	BYBHFLMA	DLBHFLKP	SOUTHEAST
46	BYBHFLMA	FTLDFLJA	SOUTHEAST
47	BYBHFLMA	HLWDFLMA	SOUTHEAST

48	BYBHFLMA	HLWDFLWH	SOUTHEAST
49	BYBHFLMA	JPTRFLMA	SOUTHEAST
50	BYBHFLMA	MIAMFLNM	SOUTHEAST
51	BYBHFLMA	MIAMFLPL	SOUTHEAST
52	BYBHFLMA	NDADFLGG	SOUTHEAST
53	BYBHFLMA	PMBHFLMA	SOUTHEAST
54	BYBHFLMA	WPBHFLGR	SOUTHEAST
55	DLBHFLKP	DLBHFLMA	SOUTHEAST
56	DLBHFLKP	FTLDFLCY	SOUTHEAST
57	DLBHFLKP	FTLDFLMR	SOUTHEAST
58	DLBHFLKP	FTLDFLQA	SOUTHEAST
59	DLBHFLKP	FTLDFLPL	SOUTHEAST
60	DLBHFLKP	HLWDFLMA	SOUTHEAST
61	DLBHFLKP	MIAMFLGR	SOUTHEAST
62	DLBHFLKP	MIAMFLNM	SOUTHEAST
63	DLBHFLKP	NDADFLGG	SOUTHEAST
64	DLBHFLKP	PMBHFLFE	SOUTHEAST
65	DLBHFLKP	WPBHFLAN	SOUTHEAST
66	DLBHFLKP	WPBHFLGR	SOUTHEAST
67	DLBHFLKP	WPBHFLHH	SOUTHEAST
68	DLBHFLKP	WPBHFLLE	SOUTHEAST
69	DLBHFLMA	HLWDFLMA	SOUTHEAST
70	DLBHFLMA	JPTRFLMA	SOUTHEAST
71	DLBHFLMA	MIAMFLNM	SOUTHEAST
72	FTLDFLCR	FTLDFLJA	SOUTHEAST
73	FTLDFLCR	HLWDFLPE	SOUTHEAST
74	FTLDFLCR	HLWDFLWH	SOUTHEAST
75	FTLDFLCR	MIAMFLGR	SOUTHEAST
76	FTLDFLCR	MIAMFLNM	SOUTHEAST
77	FTLDFLCR	NDADFLGG	SOUTHEAST
78	FTLDFLCR	PMBHFLMA	SOUTHEAST
79	FTLDFLCY	JPTRFLMA	SOUTHEAST
80	FTLDFLCY	MIAMFLCA	SOUTHEAST
81	FTLDFLCY	MIAMFLNM	SOUTHEAST
82	FTLDFLCY	MIAMFLRR	SOUTHEAST
83	FTLDFLCY	MIAMFLSO	SOUTHEAST
84	FTLDFLCY	MIAMFLWM	SOUTHEAST
85	FTLDFLCY	PMBHFLCS	SOUTHEAST
86	FTLDFLCY	PRRNFLMA	SOUTHEAST
87	FTLDFLCY	VRBHFLMA	SOUTHEAST
88	FTLDFLJA	FTLDFLSG	SOUTHEAST
89	FTLDFLJA	JPTRFLMA	SOUTHEAST
90	FTLDFLJA	MIAMFLBA	SOUTHEAST
91	FTLDFLJA	MIAMFLFL	SOUTHEAST
92	FTLDFLJA	MIAMFLNM	SOUTHEAST
93	FTLDFLJA	NDADFLBR	SOUTHEAST
94	FTLDFLJA	WPBHFLLE	SOUTHEAST
95	FTLDFLMR	FTLDFLSG	SOUTHEAST
96	FTLDFLMR	JPTRFLMA	SOUTHEAST
97	FTLDFLMR	MIAMFLBA	SOUTHEAST
98	FTLDFLMR	MIAMFLFL	SOUTHEAST
99	FTLDFLMR	MIAMFLNM	SOUTHEAST

100	FTLDFLMR	NDADFLBR	SOUTHEAST
101	FTLDFLOA	FTLDFLSG	SOUTHEAST
102	FTLDFLOA	JPTRFLMA	SOUTHEAST
103	FTLDFLOA	MIAMFLBA	SOUTHEAST
104	FTLDFLOA	MIAMFLFL	SOUTHEAST
105	FTLDFLOA	MIAMFLNM	SOUTHEAST
106	FTLDFLOA	NDADFLBR	SOUTHEAST
107	FTLDFLPL	FTLDFLSG	SOUTHEAST
108	FTLDFLPL	JPTRFLMA	SOUTHEAST
109	FTLDFLPL	MIAMFLBA	SOUTHEAST
110	FTLDFLPL	MIAMFLFL	SOUTHEAST
111	FTLDFLPL	MIAMFLNM	SOUTHEAST
112	FTLDFLPL	NDADFLBR	SOUTHEAST
113	FTLDFLSG	HLWDFLWH	SOUTHEAST
114	FTLDFLSG	MIAMFLAE	SOUTHEAST
115	FTLDFLSG	MIAMFLGR	SOUTHEAST
116	FTLDFLSG	MIAMFLPL	SOUTHEAST
117	FTLDFLSG	NDADFLGG	SOUTHEAST
118	FTLDFLSG	PMBHFLFE	SOUTHEAST
119	FTLDFLSG	PMBHFLMA	SOUTHEAST
120	FTLDFLSG	WPBHFLAN	SOUTHEAST
121	HLWDFLMA	MIAMFLNM	SOUTHEAST
122	HLWDFLMA	NDADFLGG	SOUTHEAST
123	HLWDFLMA	WPBHFLGR	SOUTHEAST
124	HLWDFLMA	WPBHFLLE	SOUTHEAST
125	HLWDFLPE	NDADFLBR	SOUTHEAST
126	HLWDFLPE	WPBHFLHH	SOUTHEAST
127	HLWDFLWH	JPTRFLMA	SOUTHEAST
128	HLWDFLWH	MIAMFLBA	SOUTHEAST
129	HLWDFLWH	MIAMFLFL	SOUTHEAST
130	HLWDFLWH	MIAMFLNM	SOUTHEAST
131	HLWDFLWH	PMBHFLCS	SOUTHEAST
132	HLWDFLWH	WPBHFLLE	SOUTHEAST
133	JPTRFLMA	PMBHFLFE	SOUTHEAST
134	JPTRFLMA	PMBHFLMA	SOUTHEAST
135	JPTRFLMA	WPBHFLAN	SOUTHEAST
136	JPTRFLMA	WPBHFLHH	SOUTHEAST
137	JPTRFLMA	WPBHFLLE	SOUTHEAST
138	MIAMFLAE	MIAMFLBA	SOUTHEAST
139	MIAMFLAE	MIAMFLNM	SOUTHEAST
140	MIAMFLAE	NDADFLBR	SOUTHEAST
141	MIAMFLAP	MIAMFLPL	SOUTHEAST
142	MIAMFLAP	PRRNFLMA	SOUTHEAST
143	MIAMFLAP	WPBHFLHH	SOUTHEAST
144	MIAMFLBA	MIAMFLFL	SOUTHEAST
145	MIAMFLBA	MIAMFLGR	SOUTHEAST
146	MIAMFLBA	MIAMFLNM	SOUTHEAST
147	MIAMFLBA	MIAMFLPB	SOUTHEAST
148	MIAMFLBA	MIAMFLPL	SOUTHEAST
149	MIAMFLBA	NDADFLGG	SOUTHEAST
150	MIAMFLBA	PMBHFLCS	SOUTHEAST
151	MIAMFLBA	PMBHFLFE	SOUTHEAST

152	MIAMFLBA	PMBHFLMA	SOUTHEAST
153	MIAMFLBA	WPBHFLAN	SOUTHEAST
154	MIAMFLBA	WPBHFLHH	SOUTHEAST
155	MIAMFLCA	NDADFLBR	SOUTHEAST
156	MIAMFLCA	PMBHFLMA	SOUTHEAST
157	MIAMFLCA	WPBHFLHH	SOUTHEAST
158	MIAMFLFL	MIAMFLNM	SOUTHEAST
159	MIAMFLFL	MIAMFLPL	SOUTHEAST
160	MIAMFLFL	NDADFLGG	SOUTHEAST
161	MIAMFLFL	PMBHFLCS	SOUTHEAST
162	MIAMFLFL	PMBHFLFE	SOUTHEAST
163	MIAMFLFL	PMBHFLMA	SOUTHEAST
164	MIAMFLFL	WPBHFLAN	SOUTHEAST
165	MIAMFLFL	WPBHFLHH	SOUTHEAST
166	MIAMFLGR	MIAMFLNM	SOUTHEAST
167	MIAMFLGR	NDADFLBR	SOUTHEAST
168	MIAMFLGR	WPBHFLLE	SOUTHEAST
169	MIAMFLNM	MIAMFLPB	SOUTHEAST
170	MIAMFLNM	MIAMFLPL	SOUTHEAST
171	MIAMFLNM	NDADFLGG	SOUTHEAST
172	MIAMFLNM	PMBHFLCS	SOUTHEAST
173	MIAMFLNM	PMBHFLFE	SOUTHEAST
174	MIAMFLNM	PMBHFLMA	SOUTHEAST
175	MIAMFLNM	WPBHFLAN	SOUTHEAST
176	MIAMFLNM	WPBHFLGA	SOUTHEAST
177	MIAMFLNM	WPBHFLGR	SOUTHEAST
178	MIAMFLNM	WPBHFLHH	SOUTHEAST
179	MIAMFLNM	WPBHFLLE	SOUTHEAST
180	MIAMFLPB	NDADFLBR	SOUTHEAST
181	MIAMFLPL	NDADFLBR	SOUTHEAST
182	MIAMFLRR	NDADFLBR	SOUTHEAST
183	MIAMFLRR	PMBHFLMA	SOUTHEAST
184	MIAMFLRR	WPBHFLHH	SOUTHEAST
185	MIAMFLSO	NDADFLBR	SOUTHEAST
186	MIAMFLSO	PMBHFLMA	SOUTHEAST
187	MIAMFLSO	WPBHFLHH	SOUTHEAST
188	NDADFLBR	NDADFLGG	SOUTHEAST
189	NDADFLBR	PMBHFLCS	SOUTHEAST
190	NDADFLBR	PMBHFLMA	SOUTHEAST
191	NDADFLBR	PRRNFLMA	SOUTHEAST
192	NDADFLGG	WPBHFLHH	SOUTHEAST
193	NDADFLGG	WPBHFLLE	SOUTHEAST
194	PMBHFLCS	PMBHFLFE	SOUTHEAST
195	PMBHFLCS	PMBHFLMA	SOUTHEAST
196	PMBHFLCS	WPBHFLAN	SOUTHEAST
197	PMBHFLCS	WPBHFLHH	SOUTHEAST
198	PMBHFLMA	PRRNFLMA	SOUTHEAST
199	PMBHFLMA	WPBHFLLE	SOUTHEAST
200	PRRNFLMA	WPBHFLHH	SOUTHEAST
201	VRBHFLMA	WPBHFLHH	SOUTHEAST
202	WPBHFLGR	WPBHFLHH	SOUTHEAST
203	WPBHFLGR	WPBHFLLE	SOUTHEAST