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Proprietary Attachment to POD 22

On CD

PROPRIETARY

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FPSC-COLIMISSION CLERK

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SPRINT DOCKET NO. 030851-TP STAFF'S THIRD SET INTERROGATORY NO. 22 PAGE 1 OF 1

22. For purposes of the following request, please refer to the rebuttal testimony of Sprint witness Staihr, page 11, lines 18-21. Please explain how it was determined that this switch "overwhelmingly" serves large business customers.

Answer:

According to the data provided to the Commission Staff by KMC over of this switch's utilized capacity is used to serve enterprise customers and over of the switch's utilized capacity is used to serve customers with more than of the switch's lines at a location. Since KMC's website indicates that KMC only provides service to business customers, and the overwhelming majority of this switch is used for customers having over in lines, this obviously represents larger (as opposed to smaller) business customers, which makes it clear that this switch is used, as I state in my testimony, overwhelmingly for larger business customers.

Provided by Brian Staihr

SPRINT DOCKET NO. 030851-TP STAFF'S THIRD SET INTERROGATORY NO. 28 PAGE 2 OF 3

Response: There are 313 end user customers. Sprint does not a breakdown of number of customer locations (e.g. if a customer has multiple locations).

(f) Of those customer locations identified in (e), please indicate the number of customer locations with 3 or less DS0 lines.

Response:

5.4.5

(g) For each switch identified in (c) that provides DS0 service, please state the percent of total capacity used to provide DS0 service.

Response %

(h) For each switch identified in (c) that provides DS0 service, please state the percent of spare capacity.

Response **W** %

(i) For each switch identified in (c), please identify the ILEC wire centers served.

Resp	onse:
1. •.	

(j) Of those markets Sprint has identified as having entered, please state in which wire centers Sprint has collocation arrangements.

Response:	

SPRINT DOCKET NO. 030851-TP STAFF'S THIRD SET INTERROGATORY NO. 28 PAGE 3 OF 3



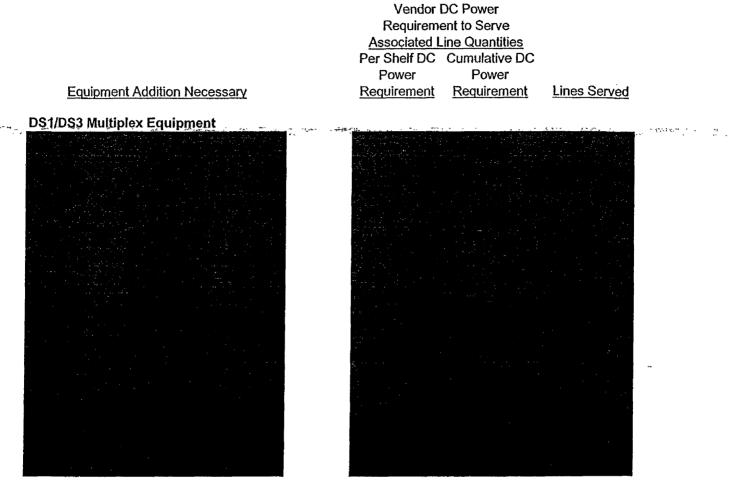
(k) Of the those markets Sprint has indicated to have entered, please state in which markets Sprint does not have a collocation arrangement in any wire center within that market.

Response: None.

Provided by John Felz

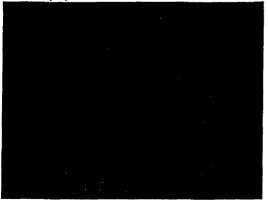
i ingén i ...

Power Requirements of DS1/DS3 Multiplex and DSL Equipment Correlated to Demand for Services

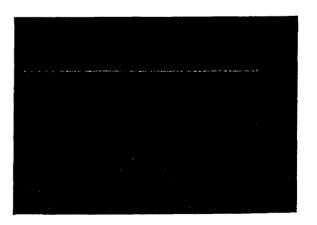


Average Amps Per 28 DS1 Circuits





Average Amps Per 224 DSL Circuits



BACE Sales Costs Model Input

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Sprint-Florida, Inc. Docket No. 030851-TP Staff's 4th Set DRs 02-Feb-04 Interrogatory No. 18

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Row		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	गर्द उल्लाह	Source / Calculation
9	BACE Sales Costs Model In	put					1	1					Sources Carculation
10	Residential Customers	- MCDAM	KOXXXX	lønen: s	\$ 38623C3823	828-382 V	k 72. 223 a	CON LAN SAN	R . 10 - 874	\$ 3.50 m	- 20. A. C. W.		
11	SOHO Customers	- 133-33-128	1280.8638	637.7280		1236723	keess s	le se	$m_{2}m_{2}m_{2}$	li. Og tød	1.48878*	Sales Acquis	sition Cost File' - (See Page 2) - Row 13
12	SME/A Customers			8882223		8-8	8.888.938		la se	12 X & Wa		Sales Acquis	sition Cost File' - (See Page 2) - Row 18
13	SME/B Customers		19.9 million	1987.2245			24.2033	rsum	1.2022				ation Cost File' - (See Page 2) - Row 23
14	SME/C Customers	- 14600-1472	1:5-2244	3388.502	83377	168 (DA)M	13.7X 1	$\mathbb{R} > \mathbb{C} > \mathbb{C}$		Rayass	B. 342 4	Sales Acquis	sition Cost File' - (See Page 2) - Row 26
	BALL O CUSIONICIS	15:17:20:622/8	<u>kees. saare</u>	1.8628.628 · 4	********	17 - 22 - 22 - 22 - 22 - 22 - 22 - 22 -	<u> </u>	\mathbb{D}		1942 (M. 187	12 A. C.Y.,	Sales Acquis	ation Cost File' - (See Page 2) - Row 29
												12	

Sales Acquisition Costs Calculations

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Sprint-Florida, inc. Docket No. 030851-TP Staff's 4th Set DRs 02-Feb-04 Interrogatory No. 18

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	_											Interrogatory No. 18
Ê	B C	D	E	F	G	н	1	t	к	,		•
Row	Description	Veart	Year 2				1. S. S.		F	<u></u>	M	N
9	Sales Acquisition Costs	1	5	··· ; L \$81'.3 ;	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Source ACalculation
10	Order Process, Media, OMSC, & Verification	1:52:56	200-222-228		-conservation	- 24 - 88	1	این دوله معین				A Second Construction of the second construction
11	Sales - Residential	123832		3.2.20		3. C () () ()		. TA T	12X (SZ)	S. 20 - X. I		Row 55
12	Cost per Residential Line Acquisition		9343334	8946C)		CHE DE		(x) : V	12-5°- 31	\sim \sim \sim		Row 58
13	BACE model input - cost per Res customer	12.8223	R.33238-9	Ca. 83					[X x **]			Row 10 + Row 11
14		- Maria			2660 (26	te e se	8.4694		. A G S A	389 O I		Row, 12 / C79
15	Order Process Metha, OMSC, & Verification						(* C. S		18 A A A			l.
16	Sales - SOHO				878-28-23	38 A	8,282.1	k C.S.	84 B B			Row-55
17	Cost per SOHO Lute Acquisition	13.389	*****	*****	3836 AG	0.736.23				R: 4		Row 60
18 19	BACE model input - cost per SOHO customer		. KIKA		83838	20 M M			8 (SA)		X. 1993	Row 15 + Row 16
20				8.3.4220				44 E - 11 E				Row 17 * C80
20	Order Process, Media, OMSC, & Verification	<u>nesses</u>	333-22A	e se an	192223	: X (* - 3		N: #72	84 S #24			
22	Sales - SME/A	13 222		382/883	22.223	8 N. N. N	n se		s de la compañía de la		13 I.S. 28 I	Row 55
23	Cost per SME/A Line Acquisition BACE model input - cost per SME/A customer		202033	K. A. S.	88 M	****	\$12#C\$	87 N. I	양감은 승규님	12 2 21		Row 62
24	bace motier input - cost per SME/A customer		1940 S (M		8.273 SI	\$18334	č) – 24.3		2339			Row 20 + Row 21
25	Cost per SME/B Line Acq			38928-1	Q.N. S. I.	2. N. Y. J	$\sim < 1$		ee se	옷이네	化二氯乙基乙酮	Row 22 * C81
26	BACE model input - cost per SME/B customer	14-2231	843-77 M	8-232.24	W.A.S.I		NO	× :2 (4	%?			Row 64
37		1222231	i Xevini (ru (Ri	s de la compacta de l	s (8 - 8 - 8		×. ^.>		*		Row 25 * C82
28	Cost per SME/C Line Acq.		138 S. M		in se stati	n a shekara na shekara	k tir sin h		es de la companya de	90 ° M		104 20 682
29	BACE model input - cost per SME/C customer		~~~~	i se a se	e sa	289) - N				83.X.B		Row 66
		1	2.1.186.894		21350 M (C)		\cdots			<u> </u>		Row: 28 * C83
	Sales Acquisition Cost Inputs	T										1
33	Annual Cost Trend	3. S. S. S.		S. 18780-14			A COMPANY					
34			5.200	2304		848°		220 M	34 N S S			Input
35 36	DS0 Service - Non-recurring	ke sid			3. (2° (* 1		see a se	신경동영험	꼬장신	1993) 1993		
37	Order Processing - (per line) Media Total		7927.A	16.400M	89 OF	er i d	옷았었	8.4.4	9. N N N	0.200 1	문을 관심	
38			NGC 204	60300)	****	U.S.S	- Carles de			8 X 4 B	~ 21	input (Z-Tel Contract Rate - See Page 5)
39	Order Management Service Center - (per line) Third-Party Verification - (per line)		499228	91.314	6366 - SA						S & A 4	input (Media Test Calculation - See Page 4)
40	render any vernication - (per tine)	r in the second s	7.49 M ()	er an	8.9X-Q.K		y se	de ISB	29 H A	833 H	A 1971 - 1971 -	aput (Sprut Complete Sense UNEP Business Case)
41	Sales & Marketing - Residential - (per line)		1999		***>>33	at the second	23431	263 × 34	et se			nput (Sprint Complete Sense UNEP Business Case)
42	Sales & Marketing - SOHO - (per line)	N 977 (B		ccard	NE NE SER			0.2%. A	stand v	N 19	~ 것.	npul - Page 5 (Sprint Complete Sense UNEP Business Case)
43	Sales & Marketing - SME/A - (per line)	1842-394 	e se	e de set	CARA AN	(SA	812-SMI	말랐은 위	88 : Saite	i stati	** \$ 1 1	nput - Fage 3 (Sprint Complete Sense UNEP Business Case) nput - (Edge Out Business Case) - (Edge Actuals - See Page 7)
44	Sales & Marketing - SME/B - (per line)		0	u webb	CAN CE	i an	2892 H	e e e e e e e e e e e e e e e e e e e	\$\$`\$\$\$	- AM	> ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	nput - (Edge Out Business Case) - (Edge Actuals - See Page 7) nput - (Edge Out Business Case) - (Edge Actuals - See Page 7)
45	Sales & Marketing - SME/C - (per line)	NS 344		12.22	r se	ge de la	82.AR	est de		ste P	8324	nput (Edge Out Business Case) - (Edge Actuals - See Page 7) nput (Edge Out Business Case)
	entere (per tille)	<u>. 1.28 - 1.27 - 28 - 1.</u>	<u> ~ </u>			<u> </u>	2 - 2 X -			or in the second se		nput (Edge Out Business Case)
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Sales Acquisition Costs Calculations

Sprint-Florida, Inc. Docket No. 030851-TP Staff's 4th Set DRs 02-Feb-04 Interrogatory No. 18

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	Description	a constant d	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Lear 8	Year 9	Year 10	Source / Cateulation
-										and the second sec	and the second s		
1	otal Sales Acquisition Cost		4										
╇	Customer Acquisition (Gros	s Line Adds)									_		
	Order Processing		13 - 3 - 2 - 4	see a	ter an	542 A	25401	소문화	24 N S	61.44	e george g		(Row 71+Row 72+ Row 73) * Row 36
Ł	Media - Advertising		NASAL M	********	696.CCN	tri and	XX - 1	8010 9	4.869.7	1230.3	er de la compañía de	s - 2 - 4	Row 37
	Order Management Servi	ce Center	12023		8. Y M	432.XB	84 - A	6.2533	83-8-4	<i></i>	e waa	i Ned	(Row 71+Row 72+ Row 73) * Row 38
ł	Thurd-Party Verification		8.3 8.3			27. KA M		1997-R	974X - A	18 H.H			(Row 71+Row 72+ Row 73) * Row 39
		Subiotal Per line costs	2043	. M. 1923 (* 1923)		1. N. MAR	339 M. I	28 N N	ne an	lora	See Sold	9 - SMA (S	Swn (Row 50 through Row 53)
		Fel Inte costs	100.38 571	waxinga	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	xasan wab	a na ma	2 - A - A - A - A	80 (X80).	es	836.224	874736	Row 54 / (Row 71+ Row 72+ Row 73)
	Sales - Residential		52:22.20	997.9999.000 s	sssa se sh	wa se ek	second la	zerenada	sesse as de	a, ee nad	294-8-33.	n	
	Per Line Cost		1248-884			8° % 24	XX: XX	A 1. 23	w. xi		i a a a a a a a a a a a a a a a a a a a	Sel	Row 41 * Row 71 Row 57 / Row 71
	Sales - SOHO		1463168844			9834Q	92-62-191	ac si	i se i	8 X 4	004-94	4. SA SA	Row 42 * Row 72
	Per Line Cost		186,873,84		937 3 334	e ta a cara da se cara	x exty	방학 관계 관계 위험	8420,523,	RAN 19		7 M.S.	Row 59 / Row 72
	Sales - SME/A		STEN	4082D	999998f	a ca	a Ma	. NA 1980	XXXX	xun	er au	X. 2242)	Row 43 " Row 73
	Per Luie Cost		13.52353	2012 (MA)	a an	\$6263	en sui	4. X. J		927 S	9.8CM	\$6. C. C	Row 61 / Row 73
	Sales - SME/B			788. CA)	31.11.91.B		272234	: X 87.	en de la compañía de	ses da	974 - M		Row 44 * Row 74
	Per Lute Cost		122603	28 K. M	32 M A	823 WI	987 GM	818 (N	89 A A		ão das		Row 63 / Row 74
I	Sales - SME/C				\$ 66 T I I	6704/20		264 K	파산회	N X N	esen i	0774	Row,45 * Row 75
	Per Line Cost		2.25 (2.39	<u>8.2883889</u> .	13.02534	\sim \sim \sim \sim \sim	82- <u>4</u> - 11			<u></u>		a share	Row 65 / Row 75
k	ustomer Lines - Gross New Adds		1								<u> </u>		
F	the second se	ive Total Gross Installs	124,371	255,586	391,935	532,133	675,218	820,469	967,345	1.115,438	1,264,445	1,414,137	
	Residential		105,789	113,667	119,575	124,006	127,330	129,822	131,692	133,094	134,146		Row 87 * C79
	SOHO		8,097	7,647	7,309	7,056	6,866	6,723	6,616	6,536	6,476		Row 88 # C80
	SME/A		10,485	9,901	9,464	9,136	8,890	8,705	8,567	8.463	8,385	8,327	Row 89 # C81
	SME/B		8,138	7,351	6,760	6,316	5,984	5,735	5,548	5,408	5,302	5,224	Row 90 * C82
L	SME/C		11,637	10,510	9,665	9,031	8,556	8,200	7,932	7,732	7,582	7,469	Row 91 * C83
Т	Ratio - Gross Add Lines per	Customer	T										
Γ	Res	1.06	1										BACE Model Report Output - LineQuanty-CustomerType
1	SOHO	1.11											BACE Model Report Output - LineQuanity-CustomerType
	SM	5.31											BACE Model Report Output - LineQuanity-CustomerType
	Med	12.85	1										BACE ¹ Model Report Output - LuteQuanity-CustomerType
L	Lg	80 35	1										BACE Model Report Output - LineQuanity-CustomerType
k	ustomer Gross New Adds		T			<u></u>					·		
۲	Res		100,112	107,567	113,158	117,352	120,497	122,856	124,625	125,952	126.947	127,693	BACE Model Report Output - LineQuanity-CustomerType
1	SOHO		7,265	6,860	6,557	6,330	6,160	6,032	5,936	5,864	5,810		BACE Model Report Output - LineQuanty-CustomerType
1	SME/A		1,974	1,864	1,782	1,720	1,674	1,639	1,613	1,594	1,579	1,568	
	SME/B		633	572	526	492	466	446	432	421	413	407	
	SME/C		145	131	120	112	106	102			1 I I I I I I I I I I I I I I I I I I I		
	SME/C		147		120	112	100	102	99	96	94	93	BACE Model Report Output - LineQuanity-CustomerType

Media Costs Calculations	Media	Costs	Calculations
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Sprint-Florida, Inc. Docket No. 030851-TP Staff's 4th Set DRs 02-Feb-04 Interrogatory No. 18

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A	В	С	D ;
Row	Description	Media	Calculation / Source
9	Consumer Advertising Media Spending		
10	Atlanta & Phil - One Month Media Spend		Media Test - May 2003
11	Annual Ad Spend for Atlanta & Phil		Line 10 * 12 months
12	National Ad Spend (Atlanta & Phil are 4.55% of US)	i a la calegra de la calegra d	Line 11 / .0455
13	Annual per Household Ad Spend (107 million US HH)		Line 12 / 107,000,000
14	Total Florida Households	6,337,929	Input - 2000 Census
15	Total BellSouth Residential Lines		Input - ARMIS
16	BellSouth Res Lines to Cust. (BACE Model Calc)		BACE Model Report Output - LineQuanity-CustomerType
17	Total BellSouth Households		Line 15 / Line 16
18	Percent FL HH in BellSouth Area		Line 17/Line 14
19	Total Annual Ad Spend to BellSouth Households		Line 13 * Line 17
20			
21	Total Mass Market Gross Add for 10 years	ka k	Cummulative Lines for 10 Years, - (Page 2 Row 70)
22	Total Advertising Spend for 10 years	let a state i s	Line 19 * 10
23	Average Media Costs per Gross Add		Line 22 / Line 21

Order Processing Cost Z-Tel Communications, Inc Support Non-Recurring Fee Calculation

A	В	с
Row	Cumulative	Per Order
	Number of Orders	Fee
9		
10		
11		
12		

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2003-2004 LD/SCS Expense Breakout SCS UNEP Business Case

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A	В	С	D	E
		2004 Total	2004	2004 Expense
Row		SCS Expenses	SCS Sales	Per Sale
8	Mass			
9	Earthlink			
10	PCS			
11	USAA			
12	AOL	A In		e
13	Other Partners	(*/1 P/	imi Prnnr	i pigmi
14	E-Business	1111	MV) 1 IV//I	
15	US Air		* 1	*
16	UAL			
17	NWA			
18	Retail		1	
19	Subtotal Subscriber	2.362553.52493		
20	NBD			
21	MOPS			
22	Offer Management			
23	Research			
24	Other Support			
25	Challenge			
26	Subtotal Non-Teams			
27	TOTAL MARKETING			

Note: Sprint used \$ per access line for development of the Residential Sales & Marketing costs as shown in the sales cost development on page 2, row 39. Media advertising and order processing are added to the sales and marketing cost to arrive at BACE model inputs.

Sprint-Florida, Inc. Docket No. 030851-TI Staff's 4th Set DRs 02-Feb-04 Interrogatory No. 18

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Local Telecommunications Division Results Summary - Project Ed

(Actual \$)

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Ed Market Level Financials - October 2003 YTD Project Ed Trend

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Sprint-Florida, Inc. Docket No. 030851-TP Staff's 4th Set DRs 02-Feb-04 interrogatory No. 18

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					A Section									YTD YTD	<u>7</u>
Rev	Metrics	Jan-03	Feb+03	:: Mar-03	Apr 03	May 03	Jun 03	Jul-03	Aug 03 1	Sep-03	Oct-03	Nov-03	Dec+03	Actual Budg	et∷
10	Acquisition Costs/Customer	- 「今日愛日	. K M A I		13:32:38-16			2 X N	$e_{22} \otimes e_{23}$		1 - S.	<u> </u>	223690		<u> </u>
н					leaseat.	M.C.A.	8.00	380 a.H.	S		48 J U	80 D 📈			8
12	Avg Acquired Customer Revenue	128326			143 <u>83</u> 8741				경영화를	1000	48 S. P				

Note: The customers acquired during 2003 are an indication of the actual acquisition costs experienced in capturing customers in the SME/A and SME/B customer size category. These results document that the inputs used by Sprint for the BACE Sales Acquisition costs are conservative using \$ for SME/A and \$ for SME/B customers.

030851-TP

Attachment to Interrogatory 23 part 1 and part 2

PROPRIETARY

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to Interrogatory No. 55.

Response: Sprint assumes this request should correctly reference Interrogatory 14. Based on this assumption, Sprint responds that there are no documents responsive to this request since Sprint does not have access to this central database file.

13. Referring to the rebuttal testimony of Sprint witness Dickerson, page 24, lines 12-14, please provide documents that support these recommended values.

Response: The following table summarizes Sprint-CLEC's actual and forecasted bad debt expense. It also shows the actual CLEC bad debt expense of Allegiance Telecom and Talk America, as taken from recent SEC 10-K forms (see attached). It is from a review of this information that Sprint developed its bad debt expense inputs of 10% in Year-1, 6% in Year-2, and 5% in all subsequent years.

PROPRIETARY

14. Please provide all work papers and documents that support Sprint witness Dickerson's Exhibit KWD-8 attached to his rebuttal testimony.

Response: Please find attached an Excel workbook titled "FL Staff POD 14.xls" which contains the detailed data underlying Exhibit KWD-8. The detailed data was generated directly from the BACE model version using BellSouth's proposed inputs. Specifically, the detail was produced via the BACE Reporting Tool using the "Revenue and Costs" Report Data Source and the "NetIncome-Total" Standard Report (production of the COGS-Cageless Collo amounts required the use of filtering on the "Cost Area" field).

The detailed data on the attached Excel workbook was summarized into the categories on Exhibit KWD-8 in the following manner:

Category on KWD-8	Source from "FL Staff POD 14.xls"
Net Revenue	Sum of Lines 9 & 10
Operating Expenses	Sum of Lines 11, 13, 14, 15 & 16
Income Taxes	Line 19
Capital Expenditures	Sum of Lines 12, 17 & 18

15. Please provide all documents that support your response to Interrogatory No. 62.

Response: Sprint assumes this request should correctly reference Interrogatory 21. Based on this assumption, Sprint responds: See attached POD 15.

16. Referring to the rebuttal testimony of Sprint witness Staihr, page 28, lines

BACE Model using BellSouth Inputs Account Category Detail from Reporting Tool

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Row Category	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	TotaL
9 Revenue	เป็นหนึ่งค่ะไ			Gir Cirbs g.	en er er oak				7 10 17 18 18 18 18 18 18 18 18 18 18 18 18 18			
10 Bad Debt												
11 Opex/Mtce									ين من المركز المركز المركز المركز			
12 COGS-Cageless Collo			물건 것 같은 물									
13 COGS-All else					도와 가슴다. 가슴 가슴 가슴. 1944 - 이번 이번 이번 이번 이다.							는 이상의 가격을 가려요. 1월 20일 년 1일 년 1일 년 1일
14 Sales	가지 않는 것 있으며 같이. 이용 기억에서 제공을 가지 않는								e esta della proposi Cara della d		9 - Sec S	
15 G&A												이 가장 이 아이지는 것이 아이지는 것이 아이지 않는 것이 아이지 않는 것이 아이지 않는 것이 같이 같이 같이 같이 않는 것이 같이 않는 것이 아이지 않는 것이 않는 것이 않는 것이 아이지 않는 것이 아이지 않는 것이 아이지 않는 것이 않는 것이 아이지 않는 것이 아이지 않는 것이 아이지 않는 것이 않는 않는 것이 않는 것이 않는 것이 않는 것이 않는 않는 것이 않는 것이 않는 않는 것이 않는 않는 않는 것이 않는 않는 것이 않는
16 AdValoremTax							이 사람의 사람이 있다. 이 사람이 있는 것이 같이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 없다. 것이 같이 있는 것이 같이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 같이 있는 것이 같이 있는 것이 같이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 없는 것이 있					
17 Capex						그 전문 전문	지 않는 것 같아?			성장 경찰가 같다.		
18 RetireCapex		승규는 것 같은 것			이 바람을 물었다.	그 별 같이 같다.	· 사람이 같은 것이다. - 사람이 아이 아이지?					
19 Income Taxes					en a superior de la composition no ha per en la composition de la compo			이 같은 것은 것은 것은 것이다. 이 같은 것은 것은 것은 것은 것은 것이다. 이 같은 것은 것은 것은 것은 것은 것이다.		a Maria di Kasara da Kasara. Kasilara da Kasara		
Total Cashflow						김 홍말은 승규는 바	요즘 사람이 있는 것이 없다.		1992년 1983년			