

REDACTED

ORIGINAL

ATTACHMENT B

BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
Page 1 of 1
8/18/04

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO SUPRA'S FIRST SET OF INTERROGATORIES, NOS. 3, 4, 7, 8 AND 10 AND
REQUESTS FOR PRODUCTION NOS. 1, 3, 4 AND 5, FILED JUNE 14, 2004, IN
FLORIDA DOCKET NO. 040353-TP

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09041 AUG 18 04

REDACTED

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 040353-TP
Supra's 1st Interrogatories
June 2, 2004
Item No. 3
Page 1 of 1
PUBLIC

REQUEST: Identify the TELRIC cost of each service identified in BellSouth's response to Interrogatory No. 1.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is irrelevant and not likely to lead to the discovery of admissible evidence. Customers who are eligible to receive (1) services under the Preferred Pack Plan and (2) the \$100 cash back, \$25 Gift Card, and the installation fee waiver promotions are residential, retail customers. Consequently, the relevant inquiry to determine BellSouth's costs in providing the residential exchange services and promotions is BellSouth's statewide 1FR average and not TELRIC.

Subject to and without waiving the foregoing objections, BellSouth does not have a TELRIC cost for residential local exchange service, for the individual features listed in the Preferred Pack Plan offering, or for the installation associated with this offering. BellSouth does have a TELRIC cost for the composite features UNE element (Element B.4.13) which was filed in Docket No. 990649-TP. That cost is [REDACTED].

DOCUMENT NUMBER - DATE
09041 AUG 18 03
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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 040353-TP
Supra's 1st Interrogatories
June 2, 2004
Item No. 4
Page 1 of 1
PUBLIC

REQUEST: Identify the cost to BellSouth of each service identified in BellSouth's response to Interrogatory No. 1. In providing this response, identify with specificity the methodology used to determine such costs, if such was not TSLRIC or TELRIC.

RESPONSE: The monthly cost used by BellSouth to analyze this offering is the statewide average 1FR rate of \$ [REDACTED] plus the UNE composite feature cost of \$ [REDACTED]. Additionally, the installation costs, which support the A4 Service Charges tariff, are [REDACTED]. The UNE composite feature cost is based on TELRIC methodology and the installation costs are based on TSLRIC methodology. The statewide average 1FR rate was used as a surrogate cost since the actual 1FR rates are below costs. The average rate was determined by dividing the total 1FR revenues in Florida by the total 1FR lines in Florida as of April 2003. The current statewide average rate is \$ [REDACTED].

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 040353-TP
Supra's 1st Interrogatories
June 2, 2004
Item No. 7
Page 1 of 1
PUBLIC

REQUEST: Identify with specificity the methodology used to determine BellSouth's response to Interrogatory No. 6.

RESPONSE: BellSouth has a 30 day minimum billing period. BellSouth charges \$26.95 a month for the PreferredPack Plan. BellSouth's cost in provisioning those services is [REDACTED].

REQUEST: State how the following impact BellSouth's response to Interrogatory No. 6:

- a. BellSouth's \$100 cash back offer;
- b. BellSouth's \$25 gift card;
- c. BellSouth's waiver of the PreferredPack Plan installation fee;
- d. BellSouth's \$100 cash back offer and BellSouth's \$25 gift card;
- e. BellSouth's \$100 cash back offer and BellSouth's waiver of the PreferredPack installation fee;
- f. BellSouth's \$100 cash back offer, BellSouth's \$25 gift card, and BellSouth's waiver of the PreferredPack Plan installation fee; and
- g. BellSouth's \$25 gift card and BellSouth's waiver of the PreferredPack Plan installation fee.

RESPONSE: BellSouth is unable to provide a response to the Interrogatory as written because only reacquisition customers are eligible to receive the identified promotions but any BellSouth customer can subscribe to the PreferredPack Plan. In any event, because the average winback customer stays within BellSouth for [REDACTED] months and the average BellSouth customer stays with BellSouth for [REDACTED] months, BellSouth recovers its costs in all scenarios.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 040353-TP
Supra's 1st Interrogatories
June 2, 2004
Item No. 10
Page 1 of 1
PUBLIC

REQUEST: Identify the number of BellSouth Florida end users that currently subscribe to BellSouth's PreferredPack Plan.

RESPONSE: [REDACTED] as of April 30, 2004.