

DIRECT TESTIMONY OF DENNIS B. TRIMBLE

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Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

A. My name is Dennis B. Trimble, and I am the Assistant Vice President - Pricing Strategy for GTE Service Corporation. My business address is 600 Hidden Ridge Drive, Irving, Texas.

Q. PLEASE SUMMARIZE YOUR EDUCATION AND WORK EXPERIENCE.

A. I received an undergraduate degree in business and an M.B.A. from Washington State University in the early 1970s. I also served as an Assistant Professor at the University of Idaho, where I taught undergraduate courses in statistics, operations research, and decision theory. From 1973 to 1976 I completed course work towards a Ph.D. degree in business at the University of Washington.

I joined GTE in 1976 as an Administrator of Pricing Research for General Telephone Company of the Northwest. From 1976 until 1985 I held various positions within GTE Northwest and GTE Service Corporation in the areas of demand analysis, market research, and strategic planning. In 1985, I was named Director of Market Planning for GTE Florida, Incorporated, and in 1987 I became GTE Florida's Director of Network Services Management. From 1989 to 1994 I was the Director of Demand Analysis and Forecasting for GTE Telephone

1 Operations. In October 1994 I became Director of Pricing and Tariffs
2 for GTE Telephone Operations, and in 1996 I was named Assistant
3 Vice President of Marketing Services. I assumed my current position
4 – Assistant Vice President of Pricing Strategy --in February 1998.

5

6 **Q. HAVE YOU PREVIOUSLY TESTIFIED ON BEHALF OF GTE?**

7 A. Yes. I have presented testimony on behalf of GTE before various
8 state commissions, including the Florida Commission and
9 commissions in Alabama, California, Hawaii, Indiana, South Carolina,
10 Texas, and Virginia.

11

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

13 A. My testimony identifies and addresses the policy issues presented by
14 this proceeding, and sets forth GTE's proposed monthly recurring
15 charges (MRCs) and non-recurring charges (NRCs) for unbundled
16 network elements (UNEs). I also address the Commission's
17 specifically designated Issues 1, 2, 4-6, and 9-13.

18

19 My testimony includes 4 exhibits:

20 Exhibit DBT-1 lists GTE's proposed MRCs.

21 Exhibit DBT-2 lists GTE's proposed NRCs.

22 Exhibit DBT-3 shows the calculations underlying GTE's fixed
23 allocator.

24 Exhibit DBT-4 shows the calculations underlying GTE's three-
25 zone UNE deaveraging proposal.

1 Q. WHAT OTHER GTE WITNESSES HAVE FILED DIRECT TESTIMONY
2 IN THIS PROCEEDING?

3 A. In addition to my testimony, GTE is presenting the testimony of five
4 witnesses who support GTE's proposed costs and prices for specific
5 UNEs. These costs and prices fall into two categories: (1) the costs and
6 prices of the UNEs themselves, which are reflected in GTE's proposed
7 MRCs; and (2) the costs and prices for ordering and provisioning UNEs,
8 which are reflected in GTE's proposed NRCs.

9
10 GTE witnesses **David Tucek** and **Michael Norris** sponsor GTE's cost
11 model, the Integrated Cost Model (ICM), which calculates the TELRICs
12 of the various UNEs. Mr. Tucek sponsors the ICM's investment
13 calculations, and Mr. Norris sponsors the ICM's expense calculations and
14 GTE's wholesale-only common cost calculations. As discussed by Mr.
15 Tucek, the resulting TELRICs are fully consistent with the FCC's current
16 cost rules.

17
18 GTE witness **Linda Casey** sponsors GTE's NRC Study, which calculates
19 the variable and fixed/shared costs associated with ordering and
20 provisioning UNEs.

21
22 GTE witnesses **Gregory Jacobson** and **Alan Sovereign** sponsor GTE's
23 proposed forward-looking cost of capital and depreciation rates,
24 respectively. Mr. Tucek, Mr. Norris and Ms. Casey use these inputs to
25 help calculate the TELRICs and NRC-related costs.

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I use Mr. Tucek’s cost calculations to develop monthly recurring prices for UNEs, and I use Ms. Casey’s cost calculations to develop a set of non-recurring charges.

Q. HOW IS YOUR TESTIMONY STRUCTURED?

A. My testimony is divided into two parts. Part I discusses the policy issues presented by this proceeding, such as the need to address UNE prices, universal service, and retail rates simultaneously. Part II sets forth GTE’s responses to the Commission’s specific issues.

I. POLICY ISSUES

Q. SHOULD UNE PRICES BE BASED SOLELY ON TOTAL ELEMENT LONG RUN INCREMENTAL COST (TELRIC) PLUS A SHARE OF “FORWARD-LOOKING” COMMON COSTS?

A. No. GTE has long maintained that UNE prices must, in the aggregate, reflect an ILEC’s actual costs. The FCC’s current pricing rules, however, require UNE prices to be based solely on TELRICs plus a share of forward-looking common costs. GTE does not agree with the FCC’s pricing rules, but GTE recognizes that these rules are binding upon state commissions. For this reason, the proposals set forth in Part II of my testimony fully comply with the FCC’s rules.

Please note, however, that the Court of Appeals for the Eighth Circuit is considering the substantive validity of the FCC’s rules in response to the

1 Supreme Court's decision in AT&T v. Iowa Utilities Board, 119 S. Ct. 721
2 (1999). GTE's current UNE rates, and any new rates imposed upon it as
3 a result of this proceeding, are subject to change depending on the
4 Eighth Circuit's ruling.

5

6 **Q. SHOULD UNE PRICES BE DEAVERAGED IN THE ABSENCE OF (1)**
7 **RETAIL RATE DEAVERAGING, AND (2) AN EXPLICIT, SUFFICIENT,**
8 **AND COMPETITIVELY NEUTRAL UNIVERSAL SERVICE FUND?**

9 A. Absolutely not. UNE rates and retail rates are inextricably linked. Today,
10 retail rates reflect implicit supports that promote universal service. For
11 example, rates for many business and vertical services are set well above
12 cost in order to support below-cost rates for basic residential service.
13 Retail rate "averaging" is another form of implicit support – residential
14 subscribers in low-cost, high-density areas are charged the same
15 averaged rate as residential subscribers in high-cost, low-density areas.
16 These implicit supports, however, are not sustainable in a competitive
17 environment and do not promote efficient competition. Rather, implicit
18 supports encourage CLECs to cream-skim the low-cost, high-price
19 business customers and to ignore the high-cost, low-price residential
20 customers.

21

22 The FCC recognized this point when it stayed its UNE deaveraging rule
23 until completion of its universal service proceeding. The FCC reasoned
24 that a stay was required to afford the FCC and the states "the opportunity
25 to consider in a coordinated manner the deaveraging issues that are

1 arising in a variety of contexts,” such as retail rate deaveraging and
2 universal service reform:

3 By linking the duration of the stay to the universal service
4 proceeding, we afford the states and ourselves the
5 opportunity to consider in a coordinated manner the
6 deaveraging issues that are arising in a variety of contexts
7 affecting local competition. We are considering in the
8 universal service proceeding what level of geographic
9 deaveraging to use in determining the universal service
10 support available to non-rural LECs serving high-cost
11 areas. States are confronting similar issues. In addition,
12 in the access charge reform proceeding, we are continuing
13 to assess the application of deaveraging policies to the
14 interstate access rates of incumbent LECs. Applying
15 different standards for, or degrees of, geographic
16 deaveraging in different contexts might create arbitrage
17 opportunities or distort entry incentives for new competitors.

18 Temporarily staying the effectiveness of section 51.507(f)
19 will afford regulators the opportunity to consider the
20 ramifications of deaveraging for the pricing of unbundled
21 network elements, for universal service support in high-cost
22 areas, and for interstate access services.

23 Stay Order, CC Docket No. 96-98 (May 7, 1999) (emphasis added). In
24 sum, deaveraged UNE rates cannot be established in a vacuum. They
25 are inextricably linked to deaveraged retail rates and universal service

1 support.

2

3 **Q. DO THE ARBITRAGE PROBLEMS DISCUSSED ABOVE EXIST IN**
4 **FLORIDA TODAY?**

5 A. Yes. Even in the absence of deaveraged UNE rates, GTE's competitors
6 are exploiting arbitrage opportunities. CLECs are building facilities in
7 GTE's highest-density serving areas (such as Tampa, Clearwater, and St.
8 Petersburg) and are cream-skimming GTE's business customers. At the
9 same time, residential customers are generally being ignored. The
10 CLECs are, in essence, engaged in "deaveraged" facilities-based
11 competition, selectively choosing the customers and geographic areas
12 they serve. Since they are not required to serve high-cost customers in
13 high-cost areas, they only target GTE's low-cost, high-value customers
14 in GTE's more dense serving areas.

15

16 **Q. WHAT SHOULD THE COMMISSION DO TO PREVENT OR MITIGATE**
17 **THIS CREAM-SKIMMING?**

18 A. Above all, the Commission should not adopt deaveraged UNE prices until
19 retail rates are deaveraged and an explicit, sufficient, competitively
20 neutral fund is established in accord with Section 254 of the
21 Telecommunications Act of 1996. In conjunction with establishment of
22 the fund, the Commission should affirm that the CLECs' funding
23 obligation will be retroactive. In other words, rate arbitrage will allow
24 CLECs to siphon off today's implicit supports, which will adversely affect
25 universal service. CLECs should be required to contribute their fair share

1 of support even though a permanent explicit fund has not yet been
2 established.

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II. GTE'S RESPONSES TO ISSUES

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ISSUE 1

6

Q. WHAT FACTORS SHOULD THE COMMISSION CONSIDER IN 7 ESTABLISHING RATES AND CHARGES FOR UNES (INCLUDING 8 DEAVERAGED UNES AND UNE COMBINATIONS)?

9 A. First, as discussed above, the Commission should consider the effect of
10 UNE rates on the preservation and advancement of universal service and
11 on the development of fair and efficient competition.

12

13 Generally, UNE rates should reflect a reasonable share of common
14 costs, and should be deaveraged only for those UNEs that exhibit
15 material variations in cost based on geography.

16

17 Moreover, UNE costs should be calculated at a wire center level. If costs
18 vary significantly between wire centers, then the wire centers should be
19 mapped into rate zones so that a single UNE price can be established for
20 each zone. In creating these rate zones, the Commission must weigh the
21 costs of deaveraging (e.g., the administrative and billing costs) against
22 the expected consumer gains.

23

24

ISSUE 2(a)

25

Q. WHAT IS THE APPROPRIATE METHODOLOGY TO DEAVERAGE

1 **UNES, AND WHAT IS THE APPROPRIATE RATE STRUCTURE FOR**
2 **DEAVERAGED UNES?**

3 A. The current FCC rules require UNE prices to be deaveraged into at least
4 three zones per state based on geographic differences in cost. Given
5 this, GTE proposes that the Commission retain a single rate for GTE and
6 develop different cost-based rates applicable to BellSouth and Sprint. In
7 this way, the Commission would have established at least three zones
8 per state, each of which reflects different cost characteristics.

9
10 If the Commission rejects this approach, then GTE proposes it establish
11 three new zones for the entire state after examining the cost submissions
12 of all the ILECs. GTE may submit such a proposal after it reviews the
13 cost filings and testimony of the other carriers.

14
15 If the Commission rejects this alternative, then GTE proposes three cost-
16 based zones for its service area. Our methodology for developing these
17 zones is fairly straightforward: first, we calculate the average costs for
18 UNEs at a wire center level; second, we identify those UNEs that have
19 significant cost differences between wire centers; third, we map or group
20 each wire center into one of three cost-based zones.

21
22 Finally, the rate structure for each UNE should reflect a balance of (1)
23 cost-causation principles, e.g., the matching of costs to prices, (2) the
24 opportunity for cost recovery, and (3) ease of administration, e.g., the
25 costs of billing. For example, unbundled local switching costs can be

1 divided into four categories: (1) local call set-up, (2) local call duration, (3)
2 local call transport, and (4) local call termination. Theoretically, GTE
3 could charge these four separate rate elements for all local switching.
4 GTE, however, charges an average per minute of use (mou) rate that
5 assumes a holding time (“local call duration”) of about four minutes. Most
6 other ILECs use this same rate structure. For typical local calls, this rate
7 structure makes sense—it’s easier to administer and bill a single mou
8 rate, and this rate allows the ILEC to recover its costs because the typical
9 local call has an average holding time of about four minutes.

10

11 In some instances, however, a different rate structure may be
12 appropriate. For example, many CLECs argue that ISP traffic is “local”
13 and that the ILEC’s local switching rate should be used for reciprocal
14 compensation purposes. This ISP traffic, however, has much longer
15 holding times than typical local calls— perhaps an hour or more per call.
16 GTE does not believe that this traffic is local, but even if it is, a different
17 rate structure would be required, such as a mou rate that assumes a
18 holding time of one hour, or a two-part rate that recovers call set-up costs
19 separately. These types of rate structures more accurately reflect the cost
20 characteristics of ISP traffic, and more properly balance cost causation,
21 cost recovery, and administrative ease.

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23 **ISSUE 2(b)**

24 **Q. FOR WHICH OF THE FOLLOWING UNES SHOULD THE**
25 **COMMISSION SET DEAVERAGED RATES?**

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- (1) LOOPS (ALL)**
- (2) LOCAL SWITCHING**
- (3) INTEROFFICE TRANSPORT (DEDICATED AND SHARED)**
- (4) OTHER (INCLUDING COMBINATIONS)**

A. At this time, GTE believes that only loop prices should be deaveraged, because only loop costs show significant variation between different geographic areas. Although switching costs do vary based upon the size of switch and traffic volumes, GTE does not believe that the different traffic sensitive costs warrant deaveraged unbundled switching prices. Additionally, the TELRICs for interoffice transmission facilities already reflect distance, traffic, and volume characteristics that effectively deaverages these UNE offerings.

It appears that CLECs agree that only loop prices need be deaveraged. For example, in the state of Washington (Dockets No. UT-960369, UT-960370 and UT-960371), AT&T stated that “[the] Commission need only deaverage the unbundled loop rate. . . . Obviously, it does not make sense to deaverage rates where real cost differences do not exist.” (Direct Testimony of AT&T witness Denny, at pages 2-3). Other CLECs echoed this point. (Reply Testimony of William Page Montgomery on behalf of Advanced TelCom Group, Inc., Electric Lightwave, Inc., GST Telcom Washington, Inc., NewEdge Networks, Inc., and Nextlink Washington, Inc., at page 3). Following this logic, the prices for UNE combinations should be deaveraged only for those combinations that include the local loop.

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GTE, however, does not propose deaveraged prices for all facilities that the FCC defines as "loops." In its Third Report and Order in CC Docket No. 96-98 (Nov. 5, 1999), the FCC included the following in its definition of loop: inside wiring; loop conditioning; dark fiber; attached electronics (e.g., multiplexing equipment); high-capacity loops (e.g., DS-1s); private line and special access facilities; and cross connects. The FCC's order has been appealed, but GTE will, of course, abide by it while it is in effect. In accord with the FCC's order, GTE agrees to deaverage prices for 2-wire, 4-wire, and various high-capacity loops (which also will allow for CLEC provisioning of private line and special access facilities), and GTE will deaverage prices for all UNE combinations that include these loops. But GTE is not proposing deaveraged prices for inside wiring, dark fiber, loop conditioning, attached electronics, and cross connects.

Q. WHY IS GTE NOT PROPOSING DEAVERAGED UNE PRICES FOR THESE "LOOP" FACILITIES?

A. First, the costs of loop conditioning, electronics, and cross connects do not vary significantly (if at all) by geography.

Second, although the cost of inside wire and dark fiber may vary based on geography, GTE proposes that such costs (and prices) be established on a bona fide request (BFR) basis. These facilities are inherently location or customer-specific, and therefore no cost model can be expected to calculate reasonable average costs for them. For example,

1 an office building may require greatly different inside wire than a single-
2 family residence, and therefore there will be significant differences in per
3 unit costs even if the building and residence are within the same wire
4 center. Indeed, GTE may not own any inside wire or dark fiber
5 connected to a specific customer or deployed in a specific area. For
6 these reasons, GTE proposes that the price of inside wire and dark fiber
7 be negotiated on a BFR basis. When a CLEC requests these facilities
8 in a given area, GTE will first determine whether they exist. If they do,
9 GTE will develop costs and prices based on the FCC's rules.

10

11 **ISSUE 4**

12 **Q. WHICH SUBLOOP ELEMENTS, IF ANY, SHOULD BE UNBUNDLED IN**
13 **THIS PROCEEDING, AND HOW SHOULD PRICES BE SET?**

14 A. At this time, the Commission should not establish a uniform unbundling
15 rule for subloops. As with dark fiber and inside wire, GTE's existing
16 subloops are location and customer-specific. Given this, GTE proposes
17 a BFR approach to subloop unbundling.

18

19 GTE's will use its BFR approach only to (1) evaluate the technical
20 feasibility of subloop requests and (2) establish the costs and prices for
21 subloop collocation. GTE proposed this BFR approach in its 1996
22 arbitrations with AT&T, MCI, and SPRINT, and since that time only one
23 CLEC has requested subloop unbundling. (The CLEC subsequently
24 canceled this request.)

25

1 The BFR process proposed by GTE is also consistent with the FCC's
2 approach to subloop unbundling as set forth in the Third Report and
3 Order, CC Docket No. 96-98. Specifically, paragraph 224 of the order
4 provides as follows:

5 Our approach to subloop unbundling permits evaluation of the
6 technical feasibility of subloop unbundling on a case-by-case
7 basis, and takes into account the different loop plant that has been
8 deployed in different states. We find that the questions of
9 technical feasibility, including the question of whether or not
10 sufficient space exists to make interconnection feasible at
11 assorted huts, vaults, and terminals, and whether such
12 interconnection would pose a significant threat to the operations
13 of the network, are fact specific. Such issues of technical
14 feasibility are best determined by state commissions, because
15 state commissions can examine the incumbent's specific
16 architecture and the particular technology used over the loop, and
17 thus determine whether, in reality, it is technically feasible to
18 unbundle the subloop where a competing carrier requests.

19 (Emphasis added)

20
21 Although GTE will address the technical feasibility of subloop unbundling
22 on a case-by-case basis, GTE's prices for subloop facilities, including
23 deaveraged prices, will be filed in GTE's June 2000 filing in accord with
24 FCC requirements. Specifically, GTE will propose TELRIC-based prices
25 for unbundled feeder facilities and unbundled distribution facilities. The

1 feeder facility extends from the central office main distribution frame
2 (MDF) to the feeder distribution interface (FDI), which may be a cross-
3 connect box or a digital loop carrier (DLC). The distribution facility
4 extends from the FDI to the network interface device (NID).

5

6 GTE's proposal to offer two types of subloops—feeder and distribution—is
7 consistent with the Commission's earlier rulings. In the 1996 arbitrations,
8 the CLECs requested, and the Commission ordered, unbundling of
9 feeder and distribution facilities.

10

11 In sum, GTE will present deaveraged costs and deaveraged MRCs for
12 feeder and distribution in its June 2000 filing. In addition to these MRCs,
13 GTE will propose a set of NRCs to recover the provisioning costs
14 associated with subloop unbundling.

15

16 **ISSUE 4(b)**

17 **Q. HOW SHOULD ACCESS TO SUCH SUBLOOP ELEMENTS BE**
18 **PROVIDED, AND HOW SHOULD PRICES BE SET?**

19 A. GTE will file its testimony on subloop unbundling as a part of its June
20 2000 filing. In general, though, the technically feasible points of access
21 to feeder facilities are the MDF, FDI, and DLC; the technically feasible
22 points of access to the distribution facilities are the FDI, DLC, and
23 pedestals. Again, though, whether it is technically feasible to unbundle
24 a particular subloop at a particular point should be decided on a case-by-
25 case basis.

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In all instances, the CLEC must deliver its facility to the approved access point, and GTE will connect the CLEC's facility to GTE's network. GTE will recover the costs of connecting the facilities through a set of non-recurring charges, which will be part of GTE's June 2000 filing.

ISSUE 5

Q. FOR WHICH SIGNALING NETWORKS AND CALL-RELATED DATABASES SHOULD RATES BE SET?

A. FCC Rule 319(e) requires ILECs to provide access to signaling networks, call-related databases, and service management systems on an unbundled basis. Rule 319 further defines these elements as follows:

- (a) Signaling networks include, but are not limited to, signaling links and signaling transfer points (Rule 319(e)(1)), and
- (b) For purposes of switch query and database response through a signaling network, an incumbent LEC shall provide access to its call-related databases, including but not limited to, the Calling Name Database, 911 Database, E911 Database, Line Information Database, Toll Free Calling Database, Advanced Intelligent Network Databases, and downstream number portability databases by means of physical access at the signaling transfer point linked to the unbundled databases (Rule 319(e)(2)(A)).

With one exception, GTE has proposed TELRIC-based prices for all these databases, and these prices are set forth in Exhibit DBT-1. GTE

1 has not proposed prices for access to 911 and E911 databases. GTE
2 proposes to establish these arrangements on a case-by-case basis.

3

4 **ISSUE 6**

5 **Q. UNDER WHAT CIRCUMSTANCES, IF ANY, IS IT APPROPRIATE TO**
6 **RECOVER NON-RECURRING COSTS THROUGH RECURRING**
7 **RATES?**

8 A. Generally, it is not appropriate to recover non-recurring costs through
9 recurring rates. If a cost is incurred only once, it should be recovered
10 through a one-time payment. Otherwise, the party that has incurred the
11 cost (the ILEC) acts as nothing more than a lender: it incurs an
12 immediate cost, but recovers its cost over time through a series of
13 payments.

14

15 There are two exceptions to this general rule. First, parties sometimes
16 agree to recover non-recurring costs through a monthly recurring rate.
17 In such instances, however, the parties' contract contains an early
18 termination provision, under which the buyer must pay its bill in full or
19 continue to make monthly payments (plus appropriate interest) even if it
20 discontinues operation.

21

22 Second, a company may charge a monthly recurring price for a non-
23 recurring cost where the cost object has a reasonably certain revenue-
24 producing life and is expected to be reusable by different customers. A
25 traditional example is the local loop—rather than assess a one-time

1 charge to an end user to recover the total cost of the loop, GTE and other
2 ILECs assess monthly recurring charges. In the past, ILECs were fairly
3 certain that the local loop would be in service for a given period of time
4 and that customers would continue to use it (and thus pay for it) over this
5 entire period. Given the passage of the Act and the presence of facilities-
6 based carriers, however, there is much more uncertainty, which leads to
7 increased risk that must be reflected in the ILECs' cost of capital. In the
8 same vein, ordering and provisioning costs are truly customer specific
9 and are caused by an activity that is not reusable; therefore, an NRC
10 recovery mechanism has always been the most appropriate for these
11 types of costs.

12

13 **Q. PLEASE PROVIDE AN EXAMPLE OF HOW UTILITIES MAY EMPLOY**
14 **NON-RECURRING CHARGES FOR RECOVERY OF ONE-TIME**
15 **COSTS.**

16 A. Many utilities assess a one-time "special construction charge" where a
17 customer requests a facility that is not usually deployed and is not
18 reasonably certain to be used by future customers. For example,
19 suppose a customer requests an exceptionally large and costly special
20 telecommunications facility to serve that customer's particular business
21 needs. If the ILEC believes the facility is not likely to be used by
22 subsequent tenants, it may assess a one-time charge to recover the
23 entire cost of the facility.

24

25 Most ILECs, including GTE, have tariff provisions that allow them to

1 assess such a charge under the circumstances described above. For
2 example, Section A5 of GTE Florida's General Services Tariff, which is
3 titled "Charges Applicable Under Special Conditions", gives GTE the
4 authority to institute one-time charges in cases that involve uncertain cost
5 recovery, unusually expensive equipment, no immediate prospect of
6 reusing the plant provided, and various other special circumstances.

7

8 This one-time pricing structure is used because it best matches the cost
9 to the cost-causer. In fact, if the ILEC were required to charge an MRC
10 for the special facility and the customer subsequently abandoned the
11 plant, the ILEC would suffer a "stranded cost" that would be borne by its
12 other customers.

13

14 **Q. ARE GTE'S PROPOSED NRCS BASED ON THE PRINCIPLES YOU'VE**
15 **OUTLINED?**

16 A. Yes. GTE's NRCs capture the non-recurring costs that are caused by the
17 cost causer (e.g., the CLEC). As discussed in the testimony of GTE
18 witness Linda Casey, GTE incurs two types of non-recurring costs: the
19 variable costs (principally, labor costs) that arise when GTE employees
20 review, process, and provision CLEC orders; and the shared/fixed costs
21 for the computers, buildings, and similar facilities devoted to fulfilling
22 CLEC requests.

23

24 GTE has proposed a set of NRCs to capture these two types of cost. In
25 general, GTE proposes NRCs to capture the variable costs based on the

1 time needed to process different types of CLEC orders. A CLEC that
2 places an order for a simple two-wire loop will incur a lower NRC than a
3 CLEC that places a more complicated order requiring special engineering
4 studies or a special network configuration. Ms. Casey explains how GTE
5 studied the different activities associated with different types of CLEC
6 requests to produce four separate categories of CLEC orders.

7
8 GTE's NRCs also reflect recovery of a portion of GTE's annual
9 shared/fixed costs. Specifically, whenever a CLEC places an order or
10 initiates an activity involving GTE's National Open Market Centers
11 (NOMCs), the rate the CLEC pays for "ordering" activity includes a
12 shared/fixed recovery amount of \$5.53. As I discuss later in my
13 testimony, this charge is based on an estimate of how many times
14 CLECs will use GTE's NOMCs in a year. For example, if the total annual
15 fixed costs equal \$150, and if CLECs were expected to contact GTE's
16 NOMCs a total of 100 times a year, then the "ordering" NRC would
17 include \$1.50 for recovery of shared/fixed NOMC costs. CLECs who
18 rarely (or never) use GTE's NOMC will pay very little (or nothing).

19
20 GTE's proposed shared/fixed amount, which is added to each "ordering"
21 NRC, acts to spread recovery of the "fixed / shared" costs of the NOMCs
22 over time and thus allows CLECs to pay for this cost in installments. If
23 the Commission disagrees with this rate structure, then GTE must be
24 able to recover all its costs through some other mechanism (e.g., a non-
25 bypassable surcharge on all CLEC bills or all end-user bills, or a one-time

1 charge assessed to all CLECs).

2

3 GTE's NRCs are set forth in Exhibit DBT-2. I discuss these NRCs more
4 fully below in my response to Issue 9(a).

5

6 **ISSUE 9(a)**

7 **Q. WHAT ARE THE APPROPRIATE RECURRING RATES (AVERAGED**
8 **OR DEAVERAGED AS THE CASE MAY BE) AND NON-RECURRING**
9 **CHARGES FOR EACH UNE LISTED IN THE STAFF'S ISSUES LIST?**

10 A. GTE's proposed MRCs and NRCs are set forth in Exhibits DBT-1 and
11 DBT-2, respectively. First, I will explain how the MRCs were developed,
12 and then I will discuss the NRCs.

13

14 In developing MRCs for each UNE, GTE used the following formula:

15
$$\text{UNE price} = \text{TELRIC plus } x, \text{ where } x \text{ is a reasonable share}$$

16
$$\text{of wholesale-related common costs}$$

17

18 The TELRICs were calculated by the ICM, and are discussed in the
19 testimony of GTE witness Tucek. The total forward-looking common
20 costs were calculated by the ICM's expense module, and are discussed
21 in the testimony of GTE witness Norris.

22

23 GTE assigned a reasonable share of common cost using the fixed
24 allocator approach, under which TELRICs are "marked up" by an equal
25 percentage. The fixed allocator was determined using the following

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formula:

Fixed Allocator = (1) total wholesale-related common costs,
divided by (2) the sum of all direct costs for all UNEs that
would be needed by CLECs to serve all existing customers.

Please note that the denominator of GTE's equation includes only the direct costs of those elements that are being marked up. If an MRC or NRC does not include a mark-up, then the direct costs of those facilities or activities associated with the MRC or NRC are not included in the denominator. GTE does not propose to mark-up any of its NRCs; therefore, the direct costs associated with these NRCs are excluded from GTE's calculation.

Here's an example of how the formula works: If the sum of the direct costs is \$100, and the total annual common costs are \$25, the fixed allocator is 25%. Thus, if the TELRIC of a given UNE were \$30 per month, we would multiply it by 1.25 to arrive at a price of \$37.50.

As explained by Mr. Norris, GTE's total forward-looking common costs equal \$192.3 million per year. The sum of the TELRICs for all UNEs and other direct costs of facilities to be marked up is \$1,064.2 million per year (this calculation is shown on Exhibit DBT-3). Thus, the fixed allocator is 18.1%.

Q. DOES THE FIXED ALLOCATOR APPROACH COMPLY WITH THE

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FCC'S CURRENT PRICING RULES?

A. Yes. In its First Report and Order in CC Docket No. 96-98, at paragraph 696, the FCC held that a fixed allocator is a "reasonable allocation method."

A fixed allocator, however, does not necessarily reflect the competitive market. Where, as here, significant common costs must be recovered, "the orthodox concept of second best pricing is the inverse elasticity principle, or Ramsey pricing." Nat'l Rural Telecom Assoc. v. FCC, 988 F.2d 174, 182 (D.C. Cir. 1993). The FCC, however, expressly forbids the use of Ramsey pricing in setting UNE rates because it could "raise the prices" of "relatively inelastic" UNEs, such as the local loop (First Report and Order at paragraph 696). In other words, economic efficiency and competitive markets dictate Ramsey-based prices, but the FCC expressly prohibits such prices in order to promote competition. GTE does not agree with the FCC's self-contradictory analysis or the FCC's pricing rules, which, as noted above, are under review by the Eighth Circuit. Nevertheless, GTE has complied with these rules in developing UNE prices in this proceeding.

Q. WHAT ARE THE APPROPRIATE RECURRING RATES FOR UNES?

A. GTE's proposed MRCs are set forth in Exhibit DBT-1. These MRCs are based on TELRICs, as required by the current FCC rules.

As discussed above, if the Commission requires GTE to establish

1 deaveraged MRCs within its service territory, then GTE proposes to
2 deaverage loop MRCs into three cost-based zones. These deaveraged
3 loop prices also are included in Exhibit DBT-1.

4

5 **Q. HOW DID GTE DEVELOP THESE COST-BASED ZONES AND THE**
6 **RESULTING MRCS?**

7 A. As discussed earlier, GTE calculated loop costs at the wire center level
8 and then “mapped” each wire center into one of three cost-based zones.

9

10 In Florida, GTE has 90 wire centers. The loop costs in each wire center
11 are shown on Exhibit DBT-4. As illustrated by that exhibit, the TELRICs
12 of unbundled two-wire loops vary from a low of \$12.03 to a high of
13 \$99.74, and the resulting statewide average cost is \$24.06.

14

15 All wire centers in which the average loop cost is less than the statewide
16 average loop cost of \$24.06 were mapped to Zone 1. All wire centers in
17 which the average loop cost is between the statewide average and 150%
18 of the statewide average were mapped to Zone 2. All wire centers in
19 which the average loop cost is greater than 150% of the statewide
20 average were mapped to Zone 3.

21

22 Once the wire centers were mapped, we calculated the average cost for
23 each zone. We then marked up this cost by the fixed allocator of 18.1%
24 to develop the MRCs. These calculations are shown on Exhibit DBT-4.

25

1 **Q. WHAT ARE THE APPROPRIATE NON-RECURRING CHARGES**
2 **(NRCs)?**

3 A. GTE's proposed NRCs are set forth in Exhibit DBT-2. As shown on this
4 exhibit, most UNEs have two types of NRCs: an ordering charge and a
5 provisioning charge. The ordering charge, as its name suggests, reflects
6 the costs GTE incurs when a CLEC places an order for a UNE (e.g., a
7 two-wire loop) or an activity (e.g., removing bridged taps). The
8 provisioning charge reflects the cost of provisioning that order or activity
9 (e.g., the cost of sending a technician to the field to remove bridged taps).

10

11 **Q. WHAT COSTS DO THESE NRCs REFLECT?**

12 A. The ordering and provisioning NRCs reflect the two different types of
13 costs GTE incurs in accepting and fulfilling CLEC orders: variable costs
14 and fixed/shared costs.

15

16 **Q HOW WERE THESE COSTS DEVELOPED?**

17 A. GTE's variable costs were developed based on the time needed to
18 process the different types of CLEC orders. Ms. Casey's testimony
19 explains how GTE developed these charges by studying the different
20 activities associated with different types of CLEC requests and by
21 applying current labor rates. GTE has developed separate sets of NRCs
22 that link the cost with the cost-causer, e.g., a CLEC that places an order
23 for a simple two-wire loop will incur a lower NRC than a CLEC that places
24 a more complicated order.

25

1 GTE's shared/fixed costs were developed based on the costs GTE
2 actually incurred, as described in GTE's NRC Study. GTE proposes to
3 recover these costs through an additional amount included in the NRC
4 rate assessed on every CLEC order. Specifically, whenever a CLEC
5 places an order or initiates an activity involving GTE's NOMCs, the
6 CLEC's "ordering" NRC includes \$5.53 for recovery of shared/fixed
7 NOMC costs. This amount is based on an estimate of how many times
8 CLECs will use GTE's NOMCs in a year. The assumptions and
9 calculations supporting this charge are included in Exhibit DBT-2, page
10 15.

11

12 Again, these variable and shared/fixed costs are reflected in the
13 "ordering" and "provisioning" NRCs shown on Exhibit DBT-2, pages 1 -
14 4.

15

16 **Q. PLEASE PROVIDE AN EXAMPLE OF THE NRCS LISTED ON EXHIBIT**
17 **DBT-2.**

18 A. Please refer to page 1 of Exhibit DBT-2, which shows the ordering and
19 provisioning NRCs applicable to an initial order for an "Exchange-basic"
20 two-wire loop. The total cost of ordering this facility (using manual
21 method) is \$38.13, and GTE's proposed NRC equals this cost (as noted
22 above, GTE does not mark-up its NRCs). As shown on page 5 of Exhibit
23 DBT-3, this cost includes the variable costs associated with this order
24 plus a share of the NOMC fixed costs.

25

1 The total cost (and NRC) of provisioning this initial facility is \$42.17, and
2 includes the costs incurred in the provisioning of the initial loop. This
3 provisioning NRC does not include a share of the NOMC fixed cost-
4 -since the NOMC cost is caused by the ordering, not the provisioning,
5 and therefore it is recovered through the ordering NRC.

6

7 **Q. HAS GTE PROPOSED RATES FOR ALL THE UNES LISTED IN ISSUE**

8 **9?**

9 A. No. GTE has proposed rates for all the UNEs listed except subloops,
10 dark fiber, and UNE combinations. GTE will file cost studies, proposed
11 prices, and supporting testimony for these UNEs in June, 2000.

12

13 Furthermore, GTE has not proposed rates for packet switching. The
14 FCC, in its Third Report and Order, held that ILECs need not unbundle
15 packet switching. There is one exception to this rule: an ILEC must
16 unbundle packet switching where (1) the ILEC has placed its own DSLAM
17 in a remote terminal and is offering advanced services, and (2) the ILEC
18 does not permit the CLEC to collocate its DSLAM in that remote terminal
19 (Third Report and Order at para. 313). At this time, GTE has not placed
20 a DSLAM in any remote terminal to offer advanced services, and
21 therefore the FCC's exception is not triggered. If, in the future, GTE
22 elects to place DSLAMs in remote terminals, requests for unbundled
23 packet switching by CLECs will be handled via BFR, on a case-by-case
24 basis.

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ISSUE 9(b)

Q. SUBJECT TO THE STANDARDS OF THE FCC'S THIRD REPORT AND ORDER, SHOULD THE COMMISSION REQUIRE ILECS TO UNBUNDLE ANY OTHER ELEMENTS OR COMBINATIONS OF ELEMENTS? IF SO, WHAT ARE THEY AND HOW SHOULD THEY BE PRICED?

A. The Commission should not require ILECs to unbundle other elements at this time. First, the FCC's rules that govern ILEC unbundling requirements have again been appealed. The Supreme Court struck down the FCC's previous unbundling rules in AT&T v. Iowa Utilities Board, 119 S. Ct. 721 (1999), and many ILECs believe the FCC failed to follow the Court's direction in developing its revised list of UNEs on remand. Given the uncertainty surrounding the FCC's standard for unbundling, states should not impose additional requirements at this time.

Second, a state commission must apply the Act's "necessary and impair test" before it can require an element to be unbundled. Based on the evidence presented at the FCC's remand proceeding, this test is very fact-intensive, and ILECs must be able to depose and otherwise take discovery of all CLECs to assist in developing the facts.

ISSUE 10

Q. WHAT IS THE APPROPRIATE RATE, IF ANY, FOR CUSTOMIZED ROUTING?

A. GTE proposes that the rates for customized routing be established on a

1 case-by-case basis.

2

3 By way of background, ILECs are no longer required to provide Operator
4 Services and Directory Assistance (OS/DA) on an unbundled basis where
5 they offer customized routing. GTE offers customized routing in all areas
6 subject only to site-specific technical limitations. GTE also is willing to
7 offer its OS/DA services to CLECs at market-based rates. Since 1996,
8 however, GTE has not received any requests for customized routing.
9 Given this, GTE does not believe the costs and prices for customized
10 routing should be established here.

11

12 **ISSUE 11**

13 **Q. WHAT IS THE APPROPRIATE RATE, IF ANY, FOR LINE**
14 **CONDITIONING, AND IN WHAT SITUATIONS SHOULD THE RATE**
15 **APPLY?**

16 A. According to the FCC's Third Report and Order, ILECs are required to
17 "condition" loops so as to allow requesting carriers to offer advanced
18 services. For example, today's copper loops may include load coils,
19 bridged taps and similar devices that ILECs have added to gain
20 architectural flexibility and improve voice transmission capability. These
21 devices, however, diminish the loop's capacity to deliver advanced
22 services. The FCC requires ILECs to remove these devices and thus
23 "condition" the loop.

24

25 GTE's proposed NRCs for loop conditioning are listed in Exhibit DBT-2.

1 These NRCs reflect the cost GTE actually incurs in conditioning loops.
2 Some CLECs, however, contend that the loop conditioning charge should
3 be \$0.00, based on the premise that a “forward-looking network” would
4 not contain bridged taps, filters and other such devices and therefore
5 there is nothing to remove. The FCC’s Third Report and Order, however,
6 at paragraphs 192-193, clearly states that requesting carriers must
7 compensate the ILEC for all loop conditioning, including conditioned
8 loops of 18,000 feet or shorter.

9

10 The cost support for GTE’s loop conditioning NRCs is set forth in GTE’s
11 NRC Study, which is sponsored by Ms. Casey.

12

13 **ISSUE 12**

14 **Q. WITHOUT DECIDING THE SITUATIONS IN WHICH SUCH**
15 **COMBINATIONS ARE REQUIRED, WHAT ARE THE APPROPRIATE**
16 **RECURRING AND NON-RECURRING RATES FOR THE FOLLOWING**
17 **UNE COMBINATIONS:**

18 (1) **“UNE platform” consisting of: loop (all), local**
19 **(including packet, where required) switching (with**
20 **signaling), and dedicated and shared transport**
21 **(through and including local termination);**

22

23 (2) **“Extended links” consisting of: (a) loop, DS0/1**
24 **multiplexing, DS1 interoffice transport; (b) DS1 loop,**
25 **DS1 interoffice transport; and (c) DS1 loop, DS1/3**

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multiplexing, DS3 interoffice transport.

A. GTE will submit its MRCs and NRCs for UNE platforms when it files its cost studies for these platforms in June 2000. At that time, GTE will also file proposed prices for enhanced extended links (EELs), which are combinations of the local loop and transport elements.

GTE's obligation to provide EELs is currently governed by paragraph 480 of the FCC's Third Report & Order. Specifically, GTE is not required to provide EELs unless they currently exist in combined form in GTE's network. Even if they do exist in GTE's current network (e.g., as special access circuits), CLECs cannot engage in rate arbitrage by "replacing" special access circuits with EELs or by purchasing EELs to provide exchange access. The FCC has a separate proceeding underway to resolve this issue, and until it does, CLECs may not use EELs to provide exchange access.

Finally, GTE is not required to provide unbundled switching in certain areas (including the Tampa area) where (1) a CLEC is providing service to four or more end users and (2) GTE voluntarily offers EELs (Third Report and Order at paragraph 253). GTE will determine whether to provide switching or EELs on a case-by-case basis.

ISSUE 13

Q. WHEN SHOULD THE RECURRING AND NON-RECURRING RATES AND CHARGES TAKE EFFECT?

A. The rates set forth on Exhibits DBT-1 and DBT-2 should take effect on

1 the date the Commission finally approves them, in accord with paragraph
2 7 of the "Joint Stipulation Regarding Interim Deaveraging" approved by
3 the Commission on February 22, 2000. (Order No. PSC-00-0380-S-TP.)
4 Of course, GTE must be allowed sufficient time to make the necessary
5 billing and systems changes, and therefore GTE requests the
6 Commission give ILECs thirty days to implement the rates after the
7 Commission approves them.

8
9 Please note, however, that if rate for a particular UNE is established in
10 this proceeding but a CLEC's current interconnection agreement does not
11 include that UNE, the CLEC is not entitled to the UNE until the parties
12 execute an appropriate amendment. In this way, the parties can ensure
13 that all related terms and conditions are included.

14

15 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

16 A. Yes.

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GTE FLORIDA, INC.
 DOCKET NO. 990649-TP
 UNBUNDLED NETWORK ELEMENTS
 DESCRIPTION, RATE & EXHIBIT LOCATION

DESCRIPTION	RATE	ATTACHMENT, PAGE, LINE NO.
1) 2-wire voice grade loop	\$28.41	Exhibit DBT-2, Page 2, Line 3, Column c
2) 4-wire analog loop	\$62.20	Exhibit DBT-2, Page 2, Line 10, Column c
3) 2-wire ISDN/IDSL loop	\$28.41	See Footnote 1
4) 2-wire xDSL-capable loop	\$28.41	See Footnote 1
5) 4-wire xDSL-capable loop	\$62.20	See Footnote 1
6) 4-wire 56 kbps loop	\$62.20	See Footnote 1
7) 4-wire 64 kbps loop	\$62.20	See Footnote 1
8) DS-1 loop	\$223.23	Exhibit DBT-2, Page 2, Line 20, Column c
9) high capacity loops (DS3 and above)	\$1,208.03	Exhibit DBT-2, Page 2, Line 21, Column c
10) dark fiber loop	TBD	To be Filed June, 2000
11) subloop elements	TBD	To be Filed June, 2000
12) network interface devices	\$0.90	Exhibit DBT-2, Page 2, Line 35, Column c
13) circuit switching (where required)	Various	See Footnote 2
14) packet switching (where required)	n/a	Not Required.
15) shared interoffice transmission	Various	Exhibit DBT-2, Page 3, Lines 67-70, Column c
16) dedicated interoffice transmission	Various	Exhibit DBT-2, Page 3, Lines 56-61, Column c
17) dark fiber interoffice facilities	TBD	To be Filed June, 2000
18) signaling networks and call-related databases	Various	Exhibit DBT-2, Page 3, Lines 81-102, Column c
19) OS/DA (where required)	n/a	GTE offers customized routing, therefore OS/DA is not required

Footnotes:

- 1) May require loop conditioning.
- 2) Circuit Switching includes the following:
- | | | |
|--------------------------------|-------------|--|
| Ports | Various | Exhibit DBT-2, Page 2, Lines 40-43, Column c |
| Local Central Office Switching | \$0.0026691 | Exhibit DBT-2, Page 2, Line 46, Column c |
| Features | Various | Exhibit DBT-2, Pages 4-7, Column c |

GTE Florida, Inc.
 Docket No. 990649-TP
 Unbundled Network Elements
 TELRICs

Fixed
 Allocator
 18.1% (d)

Unbundled Elements / Services	(a) TELRIC / 1		(b) = (a) * (d) Common Cost Recovery	(c)=(a)+(b) Proposed Rates
	\$/line/month	\$/minute		
1 (1) LOCAL LOOPS (excludes NID)				
2 <u>Local Loop</u>				
3 2-Wire Voice Grade Loop	\$24.06		\$4.35	\$28.41
4				
5 Deaveraged Rates for 2-Wire				
6 Zone 1	20.72		\$3.75	\$24.47
7 Zone 2	27.42		\$4.96	\$32.38
8 Zone 3	49.93		\$9.04	\$58.97
9				
10 4-wire Voice Grade Loop	\$52.67		\$9.53	\$62.20
11				
12 Deaveraged Rates for 4-Wire				
13 Zone 1	\$43.85		\$7.93	\$51.78
14 Zone 2	\$60.28		\$10.91	\$71.19
15 Zone 3	\$93.97		\$17.01	\$110.98
16				
17 ISDN BRI Loop	\$29.66		\$5.37	\$35.03
18				
19 <u>High Capacity Loops</u>				
20 DS-1 Loop	\$189.02		\$34.21	\$223.23
21 DS-3 Loop	\$1,022.89		\$185.14	\$1,208.03
22				
23 Deaveraged Rates for DS-1 Loop				
24 Zone 1	\$175.04		\$31.68	\$206.72
25 Zone 2	\$198.77		\$35.98	\$234.75
26 Zone 3	\$364.95		\$66.06	\$431.01
27				
28 Deaveraged Rates for DS-3 Loop				
29 Zone 1	\$1,009.60		\$182.73	\$1,192.33
30 Zone 2	\$1,032.56		\$186.89	\$1,219.45
31 Zone 3	\$1,092.35		\$197.72	\$1,290.07
32				
33				
34 (2) NETWORK INTERFACE DEVICE				
35 Basic NID	\$0.76		\$0.14	\$0.90
36				
37				
38 (3) LOCAL SWITCHING				
39 <u>Ports *</u>				
40 Basic Analog Line Side Port	\$2.73		\$0.49	\$3.22
41 ISDN BRI Digital Line Side Port	\$11.43		\$2.07	\$13.50
42 DS-1 Digital Trunk Side Port	\$59.80		\$10.82	\$70.62
43 ISDN PRI Port	\$189.99		\$34.39	\$224.38
44				
45 <u>Local Central Office Switching (Must Purchase Port)</u>				
46 Originating / Terminating MOU	\$0.0022600		\$0.0004091	\$0.0026691
47				
48 <u>Features</u>				
49 Various				Schedule 2
50				
51 * Centrex and PBX services use existing 2 Wire port or DS1 port type				
52				

GTE Florida, Inc.
Docket No. 990649-TP
Unbundled Network Elements
TELRICs

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-1
May 1, 2000
Page 3 of 7

Fixed
Allocator

18.1% (d)

Unbundled Elements / Services	(a) TELRIC / 1		(b) = (a) * (d) Common Cost Recovery	(c)=(a)+(b) Proposed Rates
	\$/line/month	\$/minute		
53				
54 (4) DEDICATED TRANSMISSION LINKS				
55 <u>Direct Trunked Transport</u>				
56 Voice Facility Per ALM	\$0.02		\$0.00	\$0.02
57 Voice Facility Per Termination	\$10.58		\$1.91	\$12.49
58 DS1 Facility Per ALM	\$0.33		\$0.06	\$0.39
59 DS1 Per Termination	\$21.83		\$3.95	\$25.78
60 DS3 Facility per ALM	\$3.76		\$0.68	\$4.44
61 DS3 Per Termination	\$112.86		\$20.43	\$133.29
62 <u>Multiplexing</u>				
63 DS1 to Voice Multiplexing	\$159.07		\$28.79	\$187.86
64 DS3 to DS1 Multiplexing	\$437.00		\$79.10	\$516.10
65				
66 (5) COMMON/SHARED TRANSMISSION FACILITIES				
67 Transport Termination				
68 Average MOU / Term	\$0.0000855		\$0.0000155	\$0.0001010
69 Transport Facility per Mile				
70 Average MOU / Mile	\$0.0000006		\$0.0000001	\$0.0000007
71				
72 (6) TANDEM SWITCHING				
73 Tandem Switching				
74 Average MOU	\$0.0014800		\$0.0002679	\$0.0017479
75				
76				
77				
78 (7) DATABASES AND SIGNALING SYSTEMS				
79 <u>SS7 Access Service</u>				
80 Signaling Links				
81 DSAL - 56 KB	\$59.38		\$10.75	\$70.13
82 DSAL - DS1	\$147.12		\$26.63	\$173.75
83 DSAT -56 KB Facility per ALM	\$2.07		\$0.37	\$2.44
84 DSAT - DS1 Facility per ALM	\$11.67		\$2.11	\$13.78
85				
86 <u>Signal Transfer Point (STP) Port Termination</u>	\$395.65		\$71.61	\$467.26
87				
88 <u>Call Related Databases</u>				
89 Queries				
90 Carrier Selection Service - DB800	\$0.0003412		\$0.0000618	\$0.0004030
91 LJDB	\$0.0003038		\$0.0000550	\$0.0003588
92 LNP	\$0.0000214		\$0.0000039	\$0.0000253
93 CNAM	\$0.0019145		\$0.0003465	\$0.0022610
94				
95 Query Transport				
96 SS7 Query Setup				
97 DB800 Query Setup	\$0.0002591		\$0.0000469	\$0.0003060
98 CNAM Query Setup	\$0.0002288		\$0.0000414	\$0.0002702
99				
100 SS7 Query Transport				
101 DB800 Query Transport	\$0.0003528		\$0.0000639	\$0.0004167
102 CNAM Query Transport	\$0.0003115		\$0.0000564	\$0.0003679
103				
104 (8) INTERCONNECTION				
105 Expanded Interconn Srv Cross Conn DS0/VG	\$0.26		\$0.05	\$0.31
106 Expanded Interconn Srv Cross Conn DS1	\$5.05		\$0.91	\$5.96
107 Expanded Interconn Srv Cross Conn DS3	\$27.35		\$4.95	\$32.30

GTE Florida, Inc.
 Docket No. 990649-TP
 Unbundled Network Elements
 TELRICs -- Vertical Features

Unbundled Elements / Services	(a) TELRIC	(b) = (a) * (d) Common Cost Recovery	Fixed
			Allocator 18.1%
			(e) = (a) + (b) Proposed Rates
SWITCH FEATURES			
1 Three Way Calling	1.145450	\$0.21	\$1.35
2 Call Forwarding Variable	0.201260	\$0.04	\$0.24
3 Cust. Changeable Speed Calling 1-Digit	0.161210	\$0.03	\$0.19
4 Cust. Changeable Speed Calling 2-Digit	0.281180	\$0.05	\$0.33
5 Call Waiting	0.078080	\$0.01	\$0.09
6 Cancel Call Waiting	0.057310	\$0.01	\$0.07
7 Automatic Callback	0.226750	\$0.04	\$0.27
8 Automatic Recall	0.118140	\$0.02	\$0.14
9 Calling Number Delivery	0.228400	\$0.04	\$0.27
10 Calling Number Delivery Blocking	0.201090	\$0.04	\$0.24
11 Distinctive Ringing / Call Waiting	0.284310	\$0.05	\$0.34
12 Customer Originated Trace	0.111390	\$0.02	\$0.13
13 Selective Call Rejection	0.313590	\$0.06	\$0.37
14 Selective Call Forwarding	0.282280	\$0.05	\$0.33
15 Selective Call Acceptance	0.340630	\$0.06	\$0.40
16 Call Forwarding Variable CTX	0.146020	\$0.03	\$0.17
17 Call Forwarding Incoming Only	0.138420	\$0.03	\$0.16
18 Call Forwarding Within Group Only	0.099650	\$0.02	\$0.12
19 Call Forwarding Busy Line	0.131820	\$0.02	\$0.18
20 Call Forwarding Don't Answer All Calls	0.131710	\$0.02	\$0.16
21 Remote Call Forward	2.138300	\$0.39	\$2.53
22 Call Waiting Originating	0.103410	\$0.02	\$0.12
23 Call Waiting Terminating	0.038370	\$0.01	\$0.05
24 Cancel Call Waiting CTX	0.006990	\$0.00	\$0.01
25 Three Way Calling CTX	0.382200	\$0.07	\$0.45
26 Call Transfer Individual All Calls	0.143990	\$0.03	\$0.17
27 Add-On Consultation Hold Incoming Only	0.129220	\$0.02	\$0.15
28 Speed Calling Individual 1-Digit	0.064440	\$0.01	\$0.08
29 Speed Calling Individual 2-Digit	0.123220	\$0.02	\$0.15
30 Direct Connect	0.046010	\$0.01	\$0.05
31 Distinctive Alerting / Call Waiting Indicator	0.050760	\$0.01	\$0.06
32 Call Hold	0.165210	\$0.03	\$0.20
33 Semi-Restricted (Orig / Term)	0.910220	\$0.16	\$1.07
34 Fully Restricted (Orig / Term)	0.908610	\$0.16	\$1.07
35 Toll Restricted Service	0.135070	\$0.02	\$0.16
36 Call Pick-Up	0.046280	\$0.01	\$0.05
37 Directed Call Pick-Up W/Barge-In	0.034780	\$0.01	\$0.04
38 Directed Call Pick-Up W/O Barge-In	0.058350	\$0.01	\$0.07
39 Special Intercept Announcements (per C/G)	6.697050	\$1.21	\$7.91
40 Conference Calling - 6-Way Station Contr	1.338380	\$0.24	\$1.58
41 Station Message Detail Recording To Rao (per G)	1.129280	\$0.20	\$1.33
42 Station Message Detail Recording To Prem (per G)	2.784950	\$0.50	\$3.27
43 Fixed Night Service - Key (per C/G)	2.296400	\$0.42	\$2.71
44 Attd Camp-On (Non-DI Console)	0.284200	\$0.05	\$0.34
45 Attd Busy Line Verification (per C/G)	11.402960	\$2.06	\$13.47
46 Control of Facilities (per C/G)	0.039010	\$0.01	\$0.05
47 Fixed Night Service - Call Forwarding (per C/G)	1.641230	\$0.30	\$1.94
48 Attd Conference (per C/G)	36.342350	\$6.58	\$42.92
49 Circular Hunting	0.070520	\$0.01	\$0.08
50 Preferential Multiline Hunting	0.017790	\$0.00	\$0.02
51 Uniform Call Distribution (per G)	0.614030	\$0.11	\$0.73
52 Stop Hunt Key	3.507620	\$0.63	\$4.14
53 Make Busy Key	3.508840	\$0.64	\$4.14
54 Queuing	10.390720	\$1.88	\$12.27
55 Automatic Route Selection	1.904130	\$0.34	\$2.25
56 Facility Restriction Level	0.147090	\$0.03	\$0.17
57 Expansive Route Warning Tone	0.017760	\$0.00	\$0.02
58 Time-Of-Day Routing Control (per C/G)	5.486730	\$0.99	\$6.48
59 Foreign Exchange Facilities (per T/G)	3.425450	\$0.62	\$4.05
60 Anonymous Call Rejection	3.106920	\$0.56	\$3.67
61 Basic Business Group Sta-Sta ICM	0.266120	\$0.05	\$0.31
62 Basic Business Group CTX	0.139050	\$0.03	\$0.16
63 Basic Business Group Direct Outward Dialing	0.006930	\$0.00	\$0.01

GTE Florida, Inc.
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 Unbundled Network Elements
 TELRICs -- Vertical Features

Unbundled Elements / Services	(a) TELRIC	(b) = (a) * (d) Common Cost Recovery	Fixed Allocator 18.1%
			(e) = (a) + (b) Proposed Rates
64 Basic Business Group Auto ID Outward Dialing	0.000000	\$0.00	\$0.00
65 Basic Business Group Direct Inward Dialing	0.000100	\$0.00	\$0.00
66 Business Set Group Intercom All Calls	2.998730	\$0.54	\$3.54
67 Dial Call Waiting	0.063300	\$0.01	\$0.07
68 Loudspeaker Paging (per T/G)	3.423650	\$0.62	\$4.04
69 Recorded Telephone Dictation (per T/G)	3.628980	\$0.66	\$4.29
70 On-Hook Queuing For Outgoing Trunks	0.145480	\$0.03	\$0.17
71 Off-Hook Queuing For Outgoing Trunks	0.014730	\$0.00	\$0.02
72 Teen Service	0.062120	\$0.01	\$0.07
73 Bg - Automatic Call Back	0.089970	\$0.02	\$0.11
74 Voice/Data Protection	0.004450	\$0.00	\$0.01
75 Authorization Codes For Afr	0.046030	\$0.01	\$0.05
76 Account Codes For Afr	0.150820	\$0.03	\$0.18
77 Code Restriction Diversion	0.146700	\$0.03	\$0.17
78 Code Calling (per T/G)	5.009910	\$0.91	\$5.92
79 Meet-Me Conference	2.053770	\$0.37	\$2.43
80 Call Park	0.068300	\$0.01	\$0.08
81 Executive Busy Override	0.049760	\$0.01	\$0.06
82 Last Number Redial	0.087460	\$0.02	\$0.10
83 Direct Inward System Access (per G)	0.073850	\$0.01	\$0.09
84 Authorization Code Immediate Dialing	0.000000	\$0.00	\$0.00
85 Bg - Speed Calling Shared	0.004360	\$0.00	\$0.01
86 Attd Recall From Satellite	0.878590	\$0.16	\$1.04
87 Bg - Speed Calling 2-Shared	0.008110	\$0.00	\$0.01
88 Business Set - Call Pick-Up	0.035030	\$0.01	\$0.04
89 Authorization Code For Mdr	0.000000	\$0.00	\$0.00
90 Locked Loop Operation	0.000000	\$0.00	\$0.00
91 Attd Position Busy	2.559430	\$0.46	\$3.02
92 Two-Way Splitting (per A/G)	3.393240	\$0.61	\$4.01
93 Call Forwarding - All (Fixed)	0.219040	\$0.04	\$0.26
94 Business Group Call Waiting	0.000000	\$0.00	\$0.00
95 Music On Hold (per C/G)	0.614440	\$0.11	\$0.73
96 Automatic Alternate Routing	0.227540	\$0.04	\$0.27
97 Dual-tone Multifrequency (DTMF) dialing	0.000000	\$0.00	\$0.00
98 BG Dual-Tone Multifrequency (DTMF)Dialing	0.000000	\$0.00	\$0.00
99 Business Set Access To Paging	1.392220	\$0.25	\$1.64
100 Call Flip-Flop (Cbk-A)	0.211150	\$0.04	\$0.25
101 Selective Call Waiting (Class)	0.295680	\$0.05	\$0.35
102 Direct Inward Dialing	5.697540	\$1.03	\$6.73
103 Customer Dialed Acct Recording	0.469350	\$0.08	\$0.55
104 Deluxe Automatic Route Selection	21.847740	\$3.95	\$25.80
105 MDC Attn'd Console (per A/G)	7.112540	\$1.29	\$8.40
106 Warm Line	0.014480	\$0.00	\$0.02
107 Calling Name Delivery	0.043120	\$0.01	\$0.05
108 Call Forwarding Enhance (Multipath)	0.000000	\$0.00	\$0.00
109 Caller ID Name and Number	0.180210	\$0.03	\$0.21
110 Call Waiting ID	0.033190	\$0.01	\$0.04
111 Attd ID on Incoming Calls	0.750840	\$0.14	\$0.89
112 Privacy Release	0.210310	\$0.04	\$0.25
113 Display Calling Number	0.105150	\$0.02	\$0.12
114 Six-Port Conference	24.351780	\$4.41	\$28.76
115 Business Set Call Back Queing	0.006050	\$0.00	\$0.01
116 ISDN Code Calling-Answer	0.167460	\$0.03	\$0.20
117 Attd Call Park	0.280610	\$0.05	\$0.33
118 Attd Autodial	0.084170	\$0.02	\$0.10
119 Attd Speed Calling	0.470030	\$0.09	\$0.56
120 Attd Console Test	0.059270	\$0.01	\$0.07
121 Attd Delayed Operation	0.000000	\$0.00	\$0.00
122 Attd Lockout	0.000000	\$0.00	\$0.00
123 Attd Multiple Listed Directory No.	0.000000	\$0.00	\$0.00
124 Attd Secrecy	0.428400	\$0.08	\$0.51
125 Attd Wildcard Key	0.177120	\$0.03	\$0.21
126 Attd Flexible Console Alerting	0.000000	\$0.00	\$0.00
127 Attd VFG Trk Grp Busy Attd Console	0.089410	\$0.02	\$0.11

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 TELRICs -- Vertical Features

	(a)	(b) = (a) * (d)	(e) = (a) + (b)
	TELRIC	Common Cost Recovery	Proposed Rates
Fixed Allocator 18.1%			
Unbundled Elements / Services			
128 Att'd Console Act/Deact of CFU/CFI	0.148090	\$0.03	\$0.17
129 Att'd Displ of Queued Calls ICI Key	0.019030	\$0.00	\$0.02
130 Att'd Interposition Transfer	0.116840	\$0.02	\$0.14
131 Att'd Automatic Recall	0.363550	\$0.07	\$0.43
132 Att'd Serial Call	0.210310	\$0.04	\$0.25
133 Proprietary Set Interface	0.379110	\$0.07	\$0.45
134 Tie Facility Access (per ckt)	3.231670	\$0.58	\$3.82
135 WATS Access (per G)	3.643450	\$0.66	\$4.30
136 800 Service Access	3.486090	\$0.63	\$4.12
ISDN FEATURES			
137 ISDN Att'd Busy Verif Lines/Trunks	0.001510	\$0.00	\$0.00
138 ISDN Att'd Call Thru Test	0.000140	\$0.00	\$0.00
139 ISDN Shared Call Appearances DN	0.221970	\$0.04	\$0.26
140 ISDN Bridged Call Exclusion	0.027450	\$0.00	\$0.03
141 ISDN Key Sys Coverage Analog Line	1.241830	\$0.22	\$1.47
142 ISDN Queuing for ISDN Att'd w/CWI	0.021510	\$0.00	\$0.03
143 ISDN Att'd Control - Voice Terminals	0.034400	\$0.01	\$0.04
144 ISDN Att'd Night Svc (Fixed/Flexible)	0.047050	\$0.01	\$0.06
145 ISDN Emergency Access to Att'd	0.001270	\$0.00	\$0.00
146 ISDN Att'd Direct Trk Grp Selection	0.003430	\$0.00	\$0.00
147 ISDN Att'd Emergency Override	0.000010	\$0.00	\$0.00
148 ISDN Auto Dropback to Att'd	0.056370	\$0.01	\$0.07
149 ISDN Att'd Orig. Permission Display	0.011040	\$0.00	\$0.01
150 ISDN Att'd Timed Reminder	0.028510	\$0.01	\$0.03
151 ISDN Att'd Trunk Identification	0.000010	\$0.00	\$0.00
152 ISDN ISAT Trunk Queuing	0.474900	\$0.09	\$0.56
153 ISDN Att'd Trunk Group Indicators	0.032950	\$0.01	\$0.04
154 ISDN Aggr Wrk Time/# Calls Handled	0.007030	\$0.00	\$0.01
155 ISDN Total No. Calls Handled Display	0.112300	\$0.02	\$0.13
156 ISDN Att'd Traffic	0.028110	\$0.01	\$0.03
157 ISDN Att'd Number of Calls on Queue	0.002110	\$0.00	\$0.00
158 ISDN Primary Rate Interface	72.427130	\$13.11	\$85.54
159 ISDN Circuit Switch Voice/Data - PRI	14.375680	\$2.60	\$16.98
160 ISDN Call by Call Access	93.748180	\$16.97	\$110.72
161 ISDN Calling Number Delivery to PRI	0.496420	\$0.09	\$0.59
162 ISDN Pckt Swtch IEO on Dmnd B Ch	2.381380	\$0.43	\$2.81
163 ISDN Circuit Switched Voice	0.796390	\$0.14	\$0.94
164 ISDN Basic Circuit Switched Data	10.174980	\$1.84	\$12.02
165 ISDN Pack Swtch IAO D Channel	0.651590	\$0.12	\$0.77
166 ISDN X.25 Hunt Groups	0.525670	\$0.10	\$0.62
167 ISDN Outgoing Calling Line ID	0.017340	\$0.00	\$0.02
168 ISDN Att'd - Power Failure Transfer	0.004620	\$0.00	\$0.01
169 ISDN EDS Calling Name Display	0.034410	\$0.01	\$0.04
170 ISDN Att'd Camp-On	0.001120	\$0.00	\$0.00
171 ISDN Att'd Uniform Call Distribution	0.227550	\$0.04	\$0.27
172 ISDN Call Forwarding Variable	0.008760	\$0.00	\$0.01
173 ISDN Att'd Control of Facilities	0.080350	\$0.01	\$0.09
174 ISDN Att'd ID on Incoming Calls	0.002040	\$0.00	\$0.00
175 ISDN Att'd Direct Station Selection	0.017490	\$0.00	\$0.02
176 ISDN Att'd Conference	5.581930	\$1.01	\$6.59
177 ISDN Multiline Hunt Group	0.630100	\$0.11	\$0.74
178 ISDN Circular Hunting	0.103170	\$0.02	\$0.12
179 ISDN Att'd Position Busy	0.020310	\$0.00	\$0.02
180 ISDN Att'd Call Hold	0.091400	\$0.02	\$0.11
181 ISDN Call Hold	0.131680	\$0.02	\$0.16
182 ISDN Att'd Call Splitting	0.666460	\$0.12	\$0.79
183 ISDN Call Pick Up	0.248220	\$0.04	\$0.29
184 ISDN Business Group Auto Callback	0.010920	\$0.00	\$0.01
185 ISDN Toll Restricted Service	0.099310	\$0.02	\$0.12
186 ISDN Att'd Through Dialing	0.000000	\$0.00	\$0.00
187 ISDN Intercom Functions	0.002840	\$0.00	\$0.00
188 ISDN Terminal Management	0.000000	\$0.00	\$0.00
189 ISDN Priority Calling Incoming Only	0.000000	\$0.00	\$0.00

GTE Florida, Inc.
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 TELRICs -- Vertical Features

Unbundled Elements / Services	(a) TELRIC	(b) = (a) * (d) Common Cost Recovery	Fixed Allocator 18.1%
			(e) = (a) + (b) Proposed Rates
190 ISDN Mult Directory Number Button	0.000000	\$0.00	\$0.00
191 ISDN X.25 Closed User Groups	0.000000	\$0.00	\$0.00
192 ISDN X.25 Fast Select	0.000000	\$0.00	\$0.00
193 ISDN X.25 Fast Select Acceptance	0.000000	\$0.00	\$0.00
194 ISDN X.25 1-Way Out Logical Chnml	0.000000	\$0.00	\$0.00
195 ISDN X.25 Reverse Charge	0.000000	\$0.00	\$0.00
196 ISDN X.25 Reverse Charge Accept	0.000000	\$0.00	\$0.00
197 ISDN X.25 Perm Virtual Call Service	0.000000	\$0.00	\$0.00
198 ISDN Direct Connect	0.052670	\$0.01	\$0.06
199 ISDN Switched Fractional DS1/Orig	2.880770	\$0.52	\$3.40
200 ISDN Switched Fractional DS1/Term	2.883070	\$0.52	\$3.40
201 ISDN PRI D-Channel Backup	0.073610	\$0.01	\$0.09
202 ISDN PRI B Channel	2.447380	\$0.44	\$2.89
203 ISDN Non-Facility Assoc Signaling	0.638450	\$0.12	\$0.75
204 ISDN Facility Restriction Level	0.127380	\$0.02	\$0.15
205 ISDN Time and Data Display	0.022320	\$0.00	\$0.03
206 ISDN Inspect ISDN Terminals	0.041230	\$0.01	\$0.05
207 ISDN Trunking Answer Any Station	0.149350	\$0.03	\$0.18
208 ISDN X.25 Flow Control Prmr Negot.	0.000000	\$0.00	\$0.00
209 ISDN X.25 Incoming Calls Barred	0.000000	\$0.00	\$0.00
210 ISDN X.25 Outgoing Calls Barred	0.000000	\$0.00	\$0.00
211 ISDN X.25 Throughput Class Negot.	0.000000	\$0.00	\$0.00
212 ISDN Xmit Delay Selection / Indication	0.001280	\$0.00	\$0.00
213 ISDN Bridging	0.512760	\$0.09	\$0.61
214 ISDN Delayed Abbreviated Ringing	0.013400	\$0.00	\$0.02
215 ISDN Display Ringing Call Appear. Only	0.000000	\$0.00	\$0.00
216 ISDN Feature Inspect	0.021410	\$0.00	\$0.03
217 ISDN Intercom Alerting	0.006700	\$0.00	\$0.01
218 ISDN Initiated Priority Calling	0.049890	\$0.01	\$0.06
219 ISDN Remote Access to Features	0.307420	\$0.06	\$0.36
220 ISDN Additional Call Offering	0.009580	\$0.00	\$0.01

**GTE FLORIDA
WHOLESALE NRC RATE SUMMARY**

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LOCAL WHOLESALE SERVICES	Ordering		Provisioning	
	100% Manual	Semi- Mech.	Initial Unit	Add'l Unit
UNBUNDLED LOOP				
Exchange - Basic - Initial	38.13	26.98	42.17	38.81
Exchange - Basic - Subsequent	16.82	11.93	14.49	13.53
Exchange - Complex Nondigital - Initial	39.94	24.41	107.58	26.61
Exchange - Complex Nondigital - Subsequent	18.25	13.36	14.49	13.53
Exchange - Complex Digital - Initial	39.94	24.41	96.76	26.53
Exchange - Complex Digital - Subsequent	18.25	13.36	14.49	13.53
Advanced - Basic - Initial (DS0)	35.56	24.41	573.73	202.79
Advanced - Complex - Initial (DS1/DS3)	39.94	24.41	569.13	303.39
UNBUNDLED PORT				
Exchange - Basic - Initial	32.42	21.27	31.29	29.38
Exchange - Basic - Subsequent (Port Feature)	19.16	14.27	1.14	1.14
Exchange - Basic - Subsequent (CO Interconnection)	19.16	14.27	14.49	13.53
Exchange - Complex Nondigital - Initial	42.92	27.39	75.32	38.01
Exchange - Complex Nondigital - Subsequent (Port Feature)	25.28	20.39	6.23	6.23
Exchange - Complex Nondigital - Subsequent (Switch Feature Group)	29.66	20.39	23.06	-
Exchange - Complex Nondigital - Subsequent (CO Interconnection)	25.28	20.39	14.49	13.53
Exchange - Complex Digital - Initial	42.92	27.39	129.72	32.97
Exchange - Complex Digital - Subsequent (Port Feature)	25.28	20.39	5.45	5.45
Exchange - Complex Digital - Subsequent (Switch Feature Group)	29.66	20.39	23.06	-
Exchange - Complex Digital - Subsequent (CO Interconnection)	25.28	20.39	14.49	13.53
UNBUNDLED NID				
Exchange - Basic	26.44	18.21	33.99	n/a
LOOP CONDITIONING				
Exchange - Bridged Tap Removal - One Occurrence	n/a	n/a	911.76	19.93
Exchange - Bridged Tap Removal - Multiple Occurrences	n/a	n/a	1,274.26	49.83
Exchange - Load Coil Removal Only	n/a	n/a	1,448.22	-
Exchange - Bridged Tap (One) and Load Coil	n/a	n/a	1,709.68	19.93
Exchange - Bridged Tap (Multiple) and Load Coil	n/a	n/a	2,072.18	49.83
INTERIM NUMBER PORTABILITY (INP)				
Exchange - Initial	36.69	27.03	10.70	10.70
Exchange - Subsequent	22.43	19.03	4.91	4.91

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NETWORK WHOLESALE SERVICES	Ordering		Provisioning	
	100% Manual	Semi- Mech.	Initial Unit	Addt'l Unit
DEDICATED TRANSPORT				
Advanced - Basic - Initial	94.87	62.39	428.58	n/a
Advanced - Basic - Subsequent	44.50	28.15	58.20	n/a
Advanced - Complex - Initial	104.42	71.94	584.49	n/a
Advanced - Complex - Subsequent	44.50	28.15	86.80	n/a
SIGNALING SYSTEM 7 (SS7)				
Facilities and Trunks - Initial	237.05	204.57	568.54	n/a
Facilities and Trunks - Subsequent (with Engineering Review)	70.96	54.61	213.12	n/a
Facilities and Trunks - Subsequent (w/o Engineering Review)	70.96	54.61	67.28	n/a
Trunks Only - Initial	125.51	93.03	505.41	n/a
Trunks Only - Subsequent (with Engineering Review)	48.84	32.49	202.03	n/a
Trunks Only - Subsequent (w/o Engineering Review)	48.84	32.49	67.28	n/a
STP Ports (SS7 Links)	237.05	204.57	438.81	n/a
Entrance Facility/Dedicated Transport DS0 - Initial	94.87	62.39	390.08	n/a
Entrance Facility/Dedicated Transport DS0 - Subsequent	44.50	28.15	58.20	n/a
Entrance Facility/Dedicated Transport DS1/DS3 - Initial	104.42	71.94	515.03	n/a
Entrance Facility/Dedicated Transport DS1/DS3 - Subsequent	44.50	28.15	86.80	n/a

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WHOLESALE NRC RATE SUMMARY**

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MISCELLANEOUS WHOLESALE SERVICES	Ordering		Provisioning	
	100% Manual	Semi- Mech.	Initial Unit	Add'l Unit
COORDINATED CONVERSIONS				
Exchange - Standard Interval - Per Qtr. Hour	30.72	30.50	n/a	n/a
Exchange - Additional Interval - Per Qtr. Hour	26.97	26.75	n/a	n/a
Advanced - Standard Interval - Per Qtr. Hour	22.92	22.69	n/a	n/a
Advanced - Additional Interval - Per Qtr. Hour	21.12	20.89	n/a	n/a
HOT-CUT COORDINATED CONVERSIONS				
Exchange - Standard Interval - Per Hour	108.80	108.57	n/a	n/a
Exchange - Additional Interval - Per Qtr. Hour	26.97	26.75	n/a	n/a
Advanced - Standard Interval - Per Hour	83.43	83.20	n/a	n/a
Advanced - Additional Interval - Per Qtr. Hour	21.12	20.89	n/a	n/a
CUSTOMIZED ROUTING	BFR	BFR	BFR	BFR

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MISCELLANEOUS WHOLESALE CHARGES	Ordering		Provisioning	
	100% Manual	Semi- Mech.	Initial Unit	Add'l Unit
EXPEDITES				
Exchange Products	3.36	3.36	n/a	n/a
Advanced Products	25.80	25.80	n/a	n/a
OTHER				
Customer Record Search (per account)	4.21	-	n/a	n/a
CLEC Account Establishment (per CLEC)	166.32	166.32	n/a	n/a

GTE FLORIDA
WHOLESALE NRC RATE ELEMENT DETAIL

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UNBUNDLED LOOP	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi-Mech	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange-Basic-New	20.26	13.74					7.90	6.63	18.97	33.51	7.90	5.67	17.48	31.04
Exchange-Basic-Disconnect	9.90	6.98					5.32	3.13	0.21	8.66	5.32	2.17	0.26	7.77
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Initial	38.13	26.98					13.22	9.76	19.19	42.17	13.22	7.85	17.75	38.81
Exchange-Basic-Change CO Interconnection	8.85	5.67					5.69	8.90	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Subsequent	16.82	11.93					5.69	8.90	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Nondigital-New	22.85	11.95					7.63	6.63	84.34	98.61	7.83	5.67	5.98	19.47
Preordering	1.49	-												
Record Order	0.95	0.72												
Exchange-Complex Nondigital-Disconnect	9.12	6.20					4.95	3.13	0.69	8.78	4.95	2.17	0.02	7.14
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Initial	39.94	24.41					12.78	9.76	85.04	107.58	12.78	7.85	5.98	26.61
Exchange-Complex Nondigital-Change CO Interconnection	10.28	7.10					5.69	8.90	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent	16.25	13.36					5.69	8.90	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Digital-New	22.85	11.95					8.37	6.63	72.99	87.99	8.37	5.67	5.18	19.20
Exchange-Complex Digital-Disconnect	9.12	6.20					5.14	3.13	0.50	8.77	5.14	2.17	0.01	7.33
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Initial	39.94	24.41					13.51	9.76	73.49	96.76	13.51	7.85	5.17	26.53
Exchange-Complex Digital-Change CO Interconnection	10.28	7.10					5.69	8.90	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent	16.25	13.36					5.69	8.90	-	14.49	5.69	7.85	-	13.53
Advanced-Basic-New	18.47	11.95					60.86	15.71	349.11	425.48	43.32	14.75	32.78	80.84
Advanced-Basic-Disconnect	9.12	6.20					35.38	3.13	109.73	148.24	18.04	2.17	91.73	111.95
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Advanced - Basic - Initial (DS0)	38.58	24.41					96.04	18.84	458.84	573.73	61.36	16.93	124.80	202.79
Advanced-Complex Digital-New	22.85	11.95					116.22	15.71	295.32	427.28	98.88	14.75	31.02	144.66
Advanced-Complex Digital-Disconnect	9.12	6.20					54.05	3.13	84.69	141.87	36.71	2.17	119.85	158.74
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Advanced - Complex - Initial (DS1/DS3)	39.94	24.41					170.27	18.84	380.02	569.13	135.59	18.90	150.88	303.39

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UNBUNDLED PORT	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Sum-Mech	Provis	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange-Basic-New	17.85	13.33					11.75	6.63	-	18.38	11.75	5.67	-	17.42
Exchange-Basic-Disconnect	6.60	3.68					9.78	3.13	-	12.91	9.78	2.17	-	11.95
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Initial	32.42	21.27					21.53	9.78	-	31.29	21.53	7.85	-	29.38
Exchange-Basic-Change Port Feature	17.85	3.01					1.14	-	-	1.14	1.14	-	-	1.14
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Subsequent (Port Feature)	19.16	14.27					1.14	-	-	1.14	1.14	-	-	1.14
Exchange-Basic-Change CO Interconnection	17.85	8.01					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic - Subsequent (CO Interconnection)	19.16	14.27					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Nondigital-New	26.35	17.45					33.87	6.63	-	40.50	18.50	5.67	-	22.17
Exchange-Complex Nondigital-Disconnect	6.60	3.68					31.68	3.13	-	34.82	13.67	2.17	-	15.84
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Initial	42.92	27.39					65.54	9.78	-	75.32	30.16	7.85	-	38.01
Exchange-Complex Nondigital-Change Port Feature	17.31	14.13					8.23	-	-	8.23	8.23	-	-	8.23
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent (Port Feature)	25.28	20.39					8.23	-	-	8.23	8.23	-	-	8.23
Exchange-Complex Nondigital-Change Switch Feature Group	21.69	14.13					23.06	-	-	23.06	-	-	-	-
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent (Switch Feature Group)	25.66	20.39					23.06	-	-	23.06	-	-	-	-
Exchange-Complex Nondigital-Change CO Interconnection	17.31	14.13					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Nondigital - Subsequent (CO Interconnection)	25.28	20.39					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Exchange-Complex Digital-New	28.35	17.45					89.78	6.63	-	96.39	12.94	5.67	-	18.61
Exchange-Complex Digital-Disconnect	6.60	3.68					30.20	3.13	-	33.33	12.18	2.17	-	14.35
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Initial	42.92	27.39					119.98	9.78	-	129.72	26.12	7.85	-	32.67
Exchange-Complex Digital-Change Port Feature	17.31	14.13					5.45	-	-	5.45	5.45	-	-	5.45
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent (Port Feature)	25.28	20.39					5.45	-	-	5.45	5.45	-	-	5.45
Exchange-Complex Digital-Change Switch Feature Group	21.69	14.13					23.06	-	-	23.06	-	-	-	-
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent (Switch Feature Group)	25.66	20.39					23.06	-	-	23.06	-	-	-	-
Exchange-Complex Digital-Change CO Interconnection	17.31	14.13					5.69	8.80	-	14.49	5.69	7.85	-	13.53
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Complex Digital - Subsequent (CO Interconnection)	25.28	20.39					5.69	8.80	-	14.49	5.69	7.85	-	13.53

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LOOP CONDITIONING	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi-Mech.	Provis.	CO Work	Field Install	Total	Provis.	CO Work	Field Install	Total	Provis.	CO Work	Field Install	Total
Bridged Tap Removal - One Occurrence									911.76	911.76			19.93	19.93
Record Order														
NOMC Shared/Fixed Costs														
OSS - Transaction Specific Costs														
OSS - Transition Costs														
Exchange - Bridged Tap Removal - One Occurrence									911.76	911.76			19.93	19.93
Bridged Tap Removal - Multiple Occurrences									1,274.26	1,274.26			49.83	49.83
Record Order														
NOMC Shared/Fixed Costs														
OSS - Transaction Specific Costs														
OSS - Transition Costs														
Exchange - Bridged Tap Removal - Multiple Occurrences									1,274.26	1,274.26			49.83	49.83
Load Coil Removal Only									1,448.22	1,448.22				
Record Order														
NOMC Shared/Fixed Costs														
OSS - Transaction Specific Costs														
OSS - Transition Costs														
Exchange - Load Coil Removal Only									1,448.22	1,448.22				
Bridged Tap (One) and Load Coil - Bridged Tap									911.76	911.76			19.93	19.93
Bridged Tap (One) and Load Coil - Load Coil									797.92	797.92				
Record Order														
NOMC Shared/Fixed Costs														
OSS - Transaction Specific Costs														
OSS - Transition Costs														
Exchange - Bridged Tap (One) and Load Coil									1,709.68	1,709.68			19.93	19.93
Bridged Tap (Multiple) and Load Coil - Bridged Tap									1,274.26	1,274.26			49.83	49.83
Bridged Tap (Multiple) and Load Coil - Load Coil									797.92	797.92				
Record Order														
NOMC Shared/Fixed Costs														
OSS - Transaction Specific Costs														
OSS - Transition Costs														
Exchange - Bridged Tap (Multiple) and Load Coil									2,072.18	2,072.18			49.83	49.83

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UNBUNDLED NID	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange - Basic	18.47	11.95	-	-	3.57	33.99								
Preordering	1.49	-												
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Basic	26.44	18.21	-	-	3.57	33.99								

INTERIM NUMBER PORTABILITY (INP)	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi- Mech.	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Exchange-New	21.39	14.57					5.33	-	-	5.33	5.33	-	-	5.33
Exchange-Disconnect	9.12	6.20					5.37	-	-	5.37	5.37	-	-	5.37
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Initial	36.99	27.03					10.70	-	-	10.70	10.70	-	-	10.70
Exchange-Change	15.95	12.77					4.91	-	-	4.91	4.91	-	-	4.91
Record Order	0.95	0.72												
NOMC Shared/Fixed Costs	5.53	5.53												
OSS - Transaction Specific Costs	-	-												
OSS - Transition Costs	-	-												
Exchange - Subsequent	22.43	19.03					4.91	-	-	4.91	4.91	-	-	4.91

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EXPEDITES	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi-Mech	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Expedites-Exchange Products	3.36	3.36	-	-	-	-	-	-	-	-	-	-	-	-
Exchange Products	3.36	3.36	-	-	-	-	-	-	-	-	-	-	-	-
Expedites-Advanced/Special Products	3.36	3.36	22.44	-	-	22.44	-	-	-	-	-	-	-	-
Advanced Products	3.36	3.36	22.44	-	-	22.44	-	-	-	-	-	-	-	-

OTHER	Ordering		Provisioning - Per Order				Provisioning - Initial Unit				Provisioning - Add'l Unit			
	100% Manual	Semi-Mech	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total	Provis.	CO Work	Field Install.	Total
Customer Service Record Search	4.21	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Record Search (per account)	4.21	-	-	-	-	-	-	-	-	-	-	-	-	-
CLEC Account Establishment	166.32	166.32	-	-	-	-	-	-	-	-	-	-	-	-
CLEC Account Establishment (per CLEC)	166.32	166.32	-	-	-	-	-	-	-	-	-	-	-	-

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PREORDERING	Ordering	
	100% Manual	Semi- Mech.
Preordering Occurrence Rate	2.97 50%	- 50%
Weighted Preordering	1.49	-

RECORD ORDER	Ordering	
	100% Manual	Semi- Mech.
Record Order Occurrence Rate	9.46 10%	7.21 10%
Weighted Record Order	0.95	0.72

NOMC SHARED/FIXED COST

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Description	National Annual Cost
Ordering NOMC Shared/Fixed Costs	16,902,179

National Wholesale Order Volume	3,053,959
NOMC Shared/Fixed Costs	5.53

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Unbundled Network Elements
Identification of Costs Associated with "Other" Revenues

$$\text{GTE's Fixed Allocator} = \frac{\text{Total Forward-Looking Common Costs}}{\text{Total Forward-Looking Direct Costs}}$$

A. The Numerator

Total forward-looking common costs are \$192,322,227. These costs are set forth in GTE's Cost Study at Tab 29, page 010--Total Wholesale Common Costs.

B. The Denominator

Total forward-looking direct costs are \$1,064,237,575. These costs include four components:

1. Annual Capital Charges	\$543,543,541	ICM 4.1 CD
2. Annual Property Taxes	\$27,772,698	ICM 4.1 CD
3. Annual Operating Expenses	\$482,733,129	ICM 4.1 CD
4. Collocation Direct Costs	<u>\$10,188,207</u>	See DBT-3, Page 2 of 2
Total Direct Costs	\$1,064,237,575	

C. All these costs are found in GTE's Cost Study and workpapers. The Annual Operating Expenses were calculated as follows:

1. Total Operating Expenses	\$672,629,266	[Tab 23, page 547]
2. Adjustments		
a. NRC expenses	(\$57,855,718)	[Tab 23, page 547]
b. OSS expenses	(\$3,293,932)	[Tab 23, page 563]
c. General Support	\$129,921,158	[Tab 23, page 665]
d. Misc.	(\$66,345,418)	[Tab 23, page 563]
e. Wholesale common	<u>(\$192,322,227)</u>	See A above
Annual Operation Expenses	\$482,733,129	

$$\text{Fixed Allocator} = \frac{\$192,322,227}{\$1,064,237,565} = 18.1\%$$

GTE FLORIDA, INC.
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Unbundled Network Elements--Calculation of Collocation Costs

<u>Elements</u>	<u>TELRIC COST</u>
1 Building Modification	\$155.17
2 Environmental Conditioning	\$150.00
3 Caged Floor Space	\$258.62
4 Cable Subduct Space - Manhole	\$5.17
5 Cable Subduct Space	\$5.94
6 Cable Rack Space - Fiber	\$1.66
7 DC Power	\$967.24
8 Facility Termination - DS3	\$18.97
9 BITS Timing	\$9.48
10 Total Collocation MRCs	<u>\$1,572.25</u>
11	
12 Collocation MRC Annual Total (line 44 * 12)	\$18,867
13	
14 Total Florida Central Offices/Wire Centers	90
15 Collocators per Office	6
16 Total Collocators (line 47 * line 48)	540
17	
18 TOTAL COLLOCATION COST (line 45 * line 49)	\$10,188,207

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GTE FLORIDA, INC.
Docket No. 990649-TP
Unbundled Network Elements
GTE's Deaveraging Proposal Based on 2-Wire UNE Loops

Summary

Deaveraged Zone	Avg 2-Wire Loop Cost	Number of Wire Centers	Number of Lines	Percent of Lines
Zone 1	\$ 20.72	39	1,388,360	57.9%
Zone 2	\$ 27.42	38	956,690	39.9%
Zone 3	\$ 49.93	13	54,872	2.3%
Statewide	\$ 24.06	90	2,399,922	100.0%

* - From ICM 4.1 Average Costs, excluding Network Interface Device.

GTE Statewide Average 2-Wire Loop Cost = \$ 24.06
 150% of GTE Statewide Average 2-Wire Loop Cost = \$ 36.08

Wire Center Name	CLLI Code	Average Cost per Loop	Number of Lines	Zone
TAMPA MAIN				Zone 1
BEACH PARK				
ST. ARMANDS KEY				
GANDY				
UNIVERSITY				
INDIAN ROCKS				
SIESTA KEY				
ST. PETERSBURG MAIN				
FEATHER SOUND				
SARASOTA MAIN				
WESTSIDE		REDACTED		
SOUTH GULF BEACH				
SEVEN SPRINGS				
HYDE PARK				
CLEARWATER				
TEMPLE TERRACE				
ANNA MARIA				
PINELLAS				
COUNTRYSIDE				
LONGBOAT				
SWEETWATER				
ST. PETERSBURG SOUTH				
PASADENA				
LARGO				
BRADENTON BAY				
SULPHUR SPRINGS				
DUNEDIN				
WALLCRAFT				
ST. GEORGE				
ENGLEWOOD				
NORTH GULF BEACH				
SEMINOLE				
BAYOU				
LEALMAN				
SKYWAY				
CYPRESS GARDENS				
VENICE MAIN				
PALMA SOLA				
SOUTHSIDE				

Total lines = 1,388,360
 State Avg Cost = \$ 24.06

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GTE's Deaveraging Proposal Based on 2-Wire UNE Loops

Summary

Deaveraged Zone	Avg 2-Wire Loop Cost	Number of Wire Centers	Number of Lines	Percent of Lines
Zone 1	\$ 20.72	39	1,388,360	57.9%
Zone 2	\$ 27.42	38	956,690	39.9%
Zone 3	\$ 49.93	13	54,872	2.3%
Statewide	\$ 24.06	90	2,399,922	100.0%

* - From ICM 4.1 Average Costs, excluding Network Interface Device.

GTE Statewide Average 2-Wire Loop Cost = \$ 24.06
 150% of GTE Statewide Average 2-Wire Loop Cost = \$ 36.08

Wire Center Name	CLLI Code	Average Cost per Loop	Number of Lines	Zone
YBOR CITY				Zone 2
OLDSMAR				
LAKELAND MAIN				
BRADENTON MAIN				
SARASOTA SPRINGS				
NORTHSIDE				
WINTER HAVEN				
CARROLLWOOD				
NEW PORT RICHEY				
VENICE SOUTH				
BRANDON				
BAYSHORE				
TARPON SPRINGS		REDACTED		
HIGHLANDS				
LAKELAND EAST				
TAMPA EAST				
LUTZ				
BARTOW MAIN				
OSPREY				
HUDSON				
WESLEY CHAPEL				
AUBURNDALE				
ZEPHYR HILLS				
PALMETTO				
HAINES CITY MAIN				
LAKE WALES MAIN				
MULBERRY				
HAINES CITY NORTH				
LAKELAND NORTH				
PLANT CITY				
ALAFIA				
RUSKIN				
KEYSTONE				
POINCIANA				
MOON LAKE				
NORTHPORT				
WIMAUMA				
THONOTOSASSA				

Total lines = 956,690
150 % of State
Avg Cost = \$ 36.08

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GTE's Deaveraging Proposal Based on 2-Wire UNE Loops

Summary

Deaveraged Zone	Avg 2-Wire Loop Cost	Number of Wire Centers	Number of Lines	Percent of Lines
Zone 1	\$ 20.72	39	1,388,360	57.9%
Zone 2	\$ 27.42	38	956,690	39.9%
Zone 3	\$ 49.93	13	54,872	2.3%
Statewide	\$ 24.06	90	2,399,922	100.0%

* - From ICM 4.1 Average Costs, excluding Network Interface Device.

GTE Statewide Average 2-Wire Loop Cost = \$ 24.06
 150% of GTE Statewide Average 2-Wire Loop Cost = \$ 36.08

Wire Center Name	CLLI Code	Average Cost per Loop	Number of Lines	Zone
LAKE ALFRED				Zone 3
DUNDEE				
BABSON PARK				
FROSTPROOF				
POLK CITY				
LAKE WALES EAST		REDACTED		
LAND O' LAKES				
PINECREST				
ALTURAS				
BRADLEY				
PARRISH				
INDIAN LAKE				
MYAKKA CITY				
Statewide		\$ 24.06	2,399,922	

Total lines = 54,872

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GTE FLORIDA, INC.
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 Unbundled Network Elements
 GTE's Deaveraging Proposal Based on 2-Wire UNE Loop Zones
 Resulting Deaveraged Costs for 4-Wire and DS-1 Loops

Zone 1 Wire Centers			
Wire Center Name	CLLI Code	4-Wire Avg TELRIC	DS-1 Avg TELRIC
TAMPA MAIN			
BEACH PARK			
ST. ARMANDS KEY			
GANDY			
UNIVERSITY			
INDIAN ROCKS			
SIESTA KEY			
ST. PETERSBURG MAIN			
FEATHER SOUND			
SARASOTA MAIN			
WESTSIDE		REDACTED	
SOUTH GULF BEACH			
SEVEN SPRINGS			
HYDE PARK			
CLEARWATER			
TEMPLE TERRACE			
ANNA MARIA			
PINELLAS			
COUNTRYSIDE			
LONGBOAT			
SWEETWATER			
ST. PETERSBURG SOUTH			
PASADENA			
LARGO			
BRADENTON BAY			
SULPHUR SPRINGS			
DUNEDIN			
WALLCRAFT			
ST. GEORGE			
ENGLEWOOD			
NORTH GULF BEACH			
SEMINOLE			
BAYOU			
LEALMAN			
SKYWAY			
CYPRESS GARDENS			
VENICE MAIN			
PALMA SOLA			
SOUTHSIDE			
Zone 1 Average		\$ 43.85	\$ 175.04

See Note 1 See Note 2

Note 1: 4-Wire average is a weighted average using total loop quantities by wire center.
 Note 2: DS-1 average is a weighted average using total DS-1 quantities by wire center.

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Unbundled Network Elements
GTE's Deaveraging Proposal Based on 2-Wire UNE Loop Zones
Resulting Deaveraged Costs for 4-Wire and DS-1 Loops

Zone 2 Wire Centers			
Wire Center Name	CLLI Code	4-Wire Avg	DS-1 Avg
YBOR CITY			
OLDSMAR			
LAKELAND MAIN			
BRADENTON MAIN			
SARASOTA SPRINGS			
NORTHSIDE			
WINTER HAVEN			
CARROLLWOOD			
NEW PORT RICHEY			
VENICE SOUTH			
BRANDON			
BAYSHORE			
TARPON SPRINGS			
HIGHLANDS			
LAKELAND EAST			
TAMPA EAST			
LUTZ			
BARTOW MAIN			
OSPREY			
HUDSON			
WESLEY CHAPEL	REDACTED		
AUBURNDALE			
ZEPHYR HILLS			
PALMETTO			
HAINES CITY MAIN			
LAKE WALES MAIN			
MULBERRY			
HAINES CITY NORTH			
LAKELAND NORTH			
PLANT CITY			
ALAFIA			
RUSKIN			
KEYSTONE			
POINCIANA			
MOON LAKE			
NORTHPORT			
WIMAUMA			
THONOTOSASSA			
Zone 2 Average		\$ 60.28	\$ 198.77

See Note 1 See Note 2

Note 1: 4-Wire average is a weighted average using total loop quantities by wire center.

Note 2: DS-1 average is a weighted average using total DS-1 quantities by wire center.

CONFIDENTIAL

Docket No. 990649-TP
Direct Testimony of Dennis B. Trimble
Exhibit DBT-4
FPSC Exhibit _____
May 1, 2000
Page 6 of 6

GTE FLORIDA, INC.
Docket No. 990649-TP
Unbundled Network Elements
GTE's Deaveraging Proposal Based on 2-Wire UNE Loop Zones
Resulting Deaveraged Costs for 4-Wire and DS-1 Loops

Zone 3 Wire Centers			
Wire Center Name	CLLI Code	4-Wire Avg	DS-1 Avg
LAKE ALFRED			
DUNDEE			
BABSON PARK			
FROSTPROOF			
POLK CITY			
LAKE WALES EAST			
LAND O' LAKES	REDACTED		
PINECREST			
ALTURAS			
BRADLEY			
PARRISH			
INDIAN LAKE			
MYAKKA CITY			
Zone 3 Average		\$ 93.97	\$ 364.95

See Note 1

See Note 2

Note 1: 4-Wire average is a weighted average using total loop quantities by wire center.

Note 2: DS-1 average is a weighted average using total DS-1 quantities by wire center.