BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

PHASE II REBUTTAL TESTIMONY

OF

JAMES W. SICHTER
Q. Please state your name and business address.
A. My name is James W. Sichter. I am Vice PresidentRegulatory Policy, for Sprint Corporation. My business address is 6360 Sprint Parkway, Overland Park, Kansas 66251.
Q. Are You the same James W. Sichter that presented direct, supplemental, rebuttal, and additional supplemental testimony in this case?
A. Yes, I am.
Q. What is the purpose of your rebuttal testimony?
A. First, I will address the deaveraging proposals of BellSouth and GTE, in particular their failure to deaverage switching, transport, and some loop elements, and the insufficient level of deaveraging for those elements that they dqoodeavièrage. Record,
based on the wide variances in methodology and results evidenced in the filings of the three ILECs that submitted cost data and proposed rates, I will address the need for the Commission to mandate uniformity in methodology in the compliance filing pursuant to the Commission Order in this proceeding.
Q. What is Sprint's recommendation regarding the appropriate deaveraging methodology for BellSouth and GTE?
A. Sprint recommends that BellSouth and GTE be required to deaverage pursuant to the methodology discussed in my Direct Testimony. That portion of my Direct Testimony is provided in Exhibit JWS 14.
Q. GTE witness Trimble proposes (p. 9) that the Commission set a single rate for each ILEC (GTE, Sprint, and BellSouth) and that doing so would comply with the FCC rule requiring UNE prices to be deaveraged into at least three zones. Do you agree with Mr. Trimble?
A. No. The purpose of the $F C C$ 's rule requiring UNE prices to be deaveraged into at least three zones is

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to reflect geographic differences in cost. GTE's proposal to have each of the three ILECs in this proceeding develop a single, averaged rate for their respective operating areas is not consistent with the FCC's rule. GTE, BellSouth and Sprint serve both high cost and low cost areas. Adopting a single, average rate for each ILEC fails to recognize the wide cost differences within each of the ILECs' operating territories. For example, Sprint's loop costs range from $\$ 8.59$ to $\$ 149.06$, compared to its statewide average loop cost of $\$ 25.38$. The FCC's rules cannot be reasonably construed to permit the Commission to prescribe a rate that would deviate from actual wire center costs by as much as $487 \%$.
Q. BellSouth proposes deaveraged loops into three zones, based on tariffed rate groups. Do you agree?
A. No. In the first instance, BellSouth's tariffed rate groups are not an appropriate basis for deaveraging rates. As shown in Sprint's Exhibit JWS 15, BellSouth's rate groups are not based on the underlying costs of the wire centers within each of those rate groups. Consequently, BellSouth's proposed banding includes high-cost wire centers in the lowest
cost band, and low-cost wire centers in the higher cost bands. For example, the actual wire center costs within their proposed rate band 1 range from $\$ 7.50$ to \$33.27. The actual wire center costs within band 2 range from $\$ 11.57$ to $\$ 115.81$. And the actual wire center costs in band 3 range from $\$ 13.73$ to $\$ 75.95$.

BellSouth, then, would propose to charge $\$ 15.91$ for the $\$ 33.27$ loop in the wire center in band 1 , but would charge $\$ 25.54$ for the $\$ 13.73$ loop in the wire center in rate band 3. In addition, BellSouth has two wire centers whose costs are the same, \$15.59, but fall into different rate bands. BellSouth proposes to charge $\$ 15.91$ for loops in the wire center that falls into rate band 1 , and $\$ 19.98$ for loops in the wire center that falls into rate band 2. Charging different rates for loops that have the exact same costs, or charging a rate for one loop that is higher than the rate charged for a higher cost loop is both discriminatory and inconsistent with the requirement for cost-based unbundled network elements.

Secondly, 3 rates bands are insufficient to reflect the cost variations among BellSouth wire centers. While the FCC has concluded that three zones may be
sufficient to reflect geographic cost differences, it also states that "a state may establish more than three zones where cost differences in geographic regions are such that it finds that additional zones are needed to adequately reflect the costs of interconnection and access to unbundled elements" (First Report and Order, FCC Docket 96-98, released August 8, 1996, Paragraph 765).

Sprint's proposed banding criteria is that the average rate for a rate zone should not deviate by more than $20 \%$ from the wire center forward-looking cost of that element for any wire center included in that zone. By following Sprint's criteria, 8 zones would be required to map BellSouth's proposed wire center loop costs into rate zones, as set forth in Sprint's Exhibit JWS 16. However, Sprint would not be opposed to permitting a wider range of deviation in the highest cost zone, recognizing the larger cost variances in the highest cost areas and the undesirability of creating an excessive number of zones. (The exhibit is illustrative only, and should not be construed as an endorsement of BellSouth's proposed costs. Indeed, as discussed in the Rebuttal Testimony of Sprint witness Dickerson, there are significant flaws in BellSouth's
loop cost studies. The deaveraging of loop and other UNE rates pursuant to Sprint's deaveraging proposal should, of course, be based on the actual cost results approved by this Commission).
Q. GTE proposed three bands based on cost relationships to statewide average. Do you agree?
A. No. GTE's banding proposal of 3 zones is simply inadequate. As shown in Sprint's Exhibit JWS 17, 3 rate bands still produces and unacceptably high level of averaging. For example, the average cost for GTE's proposed rate group 1 is $\$ 20.72$, while the individual wire center loops costs range from $\$ 12.03$ to $\$ 24.05$, resulting in a variance of $72 \%$ between the proposed rate for the band and actual cost for the lowest cost wire center in the band. Furthermore, GTE's proposed rate for band, 3 is $\$ 49.93$, while the individual wire center costs range from $\$ 36.77$ to $\$ 99.74$, resulting in variances of as much as $100 \%$ between the proposed rate and actual wire center costs. Based on Sprint's proposed deaveraging methodology, GTE's proposed loop costs would require they deaverage their loop costs into 7 rate zones, as illustrated in Sprint's Exhibit JWS 18. As stated previously, Sprint would not be
opposed to permitting a wider range of deviation in the highest cost zone. Again, the exhibit is for illustrative purposes only, and is not an endorsement of GTE's proposed costs.
Q. Both BellSouth's witness Varner and GTE's witness Trimble assert that only loops should be deaveraged. Do you agree?
A. No. Sprint costs studies show substantial geographic cost variances for the following elements:

- Unbundled Loops
- Subloops
- Local Switch Ports/Local Switching Usage
- Tandem Switching
- Dedicated and Common Transport
- Dark Fiber
- UNE Platform
- Enhanced Extended Link (EEL)
A. No. The data the ILECs provided on UNE costs by wire center does not support their contention that those rates should not be deaveraged. Furthermore, Sprint cost data demonstrates that these elements exhibit geographic cost variances.
Q. Do the BellSouth and GTE local switching costs support their contention that the element should not be deaveraged?
A. No. BellSouth's own data shows significant geographic cost variances. For example, BellSouth's proposed wire center costs per minute of use for local switching range from $\$ .0005184$ to $\$ .0066327$, a variance of almost $1200 \%$. A variance in costs of this magnitude portrays a definite need for geographic deaveraging. In addition, the actual wire center detail provided by GTE in Tab 6 (ICM Summary Report-Unbundled Network Elements (TELRICs) State and CLLI Level) supports the need for geographic deaveraging of switching usage rates. Specifically, the costs for End-Office-Setup range from $\$ .001618$ to $\$ .008598$, while the End OfficeAVG MOU costs range from $\$ .002197$ to $\$ .005503$ (which includes GTE's proposed Common Cost additive of 18.1\%).
Q. Do the BellSouth and GTE cost studies support their conclusion that transport should not be deaveraged?
A. No. With respect to BellSouth's argument that mileage captures adequate geographic variation, Sprint witness Cox (pg. 3) explains that while distance is a cost driver; terminal bandwidth and utilization/demand on the SONET ring are the primary cost drivers, both of which may vary considerably by geographic area. Therefore, it is imperative to consider these geographic-specific factors in order to accurately depict the forward-looking cost of transport.

In addition, the actual wire center detail provided by GTE in Tab 6 (ICM Summary Report-Unbundled Network Elements (TELRICs) State and CLLI Level) supports the need for geographic deaveraging of unbundled transport facilities. GTE's Transport Termination costs vary from nearly $\$ 16$ to over $\$ 80$ per DS1 and from $\$ 95$ to nearly $\$ 450$ per DS3. Likewise, the DS1 Transport Facility costs vary from $\$ 0.38$ to nearly $\$ 22$ per ALM. Cost differentials of this scale are inconsistent with GTE's position that transport should not be deaveraged.
Q. What does Sprint propose the Commission require?
A. First, all ILECs should, in the compliance filing, be required to file wire center-specific costs for each of the elements that Sprint has proposed to deaverage. While BellSouth and GTE have failed to provide deaveraged costs for some elements, Sprint's data is prima facie evidence of cost variations. BellSouth and GTE should be required to either deaverage these elements or provide disaggregated data that demonstrates there is no significant geographic variation.

Second, the Commission should require all ILECs to adopt the same deaveraging methodology, wherein the average rate for a rate zone should not deviate by more than $20 \%$ from the wire center forward-looking cost of that element for any wire center included in that zone.
Q. Based on Sprint's review of the cost studies of GTE and BellSouth, does it believe that all ILECs have interpreted the FCC's TELRIC standard in a consistent manner?
A. No. Sprint witness Dickerson's rebuttal testimony discusses errors in the costing process used by BellSouth's TELRIC model. In addition, Sprint witness McMahon discusses Sprint's use of forward-looking, least-cost methods and procedures in developing NRCs, while BellSouth and GTE have utilized more time consuming manual processes and inflated work times. Furthermore, Sprint witness Cox discusses the importance of utilizing geographic-specific factors in developing forward-looking unbundled transport costs. BellSouth does not vary factors such as terminal bandwidth and terminal utilization by geographic area; therefore, their proposed unbundled transport costs are not geographically deaveraged.

Finally, Sprint contends that the vast differences in proposed rates do not solely reflect differences in costs between the three ILECs, rather the differences reflect methodology differences as well.
Q. How should the Commission proceed?
A. It is essential to bring cost studies into conformance with each other from a methodological standpoint. The Commission should identify major methodological
differences and mandate, for the compliance filing, that all ILECs adopt uniform assumptions and methodologies.

Sprint recognizes that the $8^{\text {th }}$ Circuit Court of Appeal's July 18, 2000, decision vacating Section 51. $505(\mathrm{~b})(1)$ of the FCC's rules will, unless stayed, impact at least Sprint's cost studies and proposed rates filed in this proceeding. Sprint will, in the future, conform its cost studies and rates to any rule revisions resulting from the $8^{\text {th }}$ Circuit decision.

However, these potential changes in the FCC's costing rules don't obviate the need for the Commission to require consistency in the costing methodologies used by the 3 ILECs in this proceeding.
Q. Does that conclude your testimony?
A. Yes.

Issue $2(a)$ : What is the appropriate methodology to deaverage UNEs and what is the appropriate rate structure for deaveraged UNEs?
Q. What general principles should the Commission apply in determining the degree to which rates for unbundled elements be deaveraged?
A. As a general principle, rates should be deaveraged to the degree necessary to achieve a result wherein the averaged rate does not deviate significantly from the actual forward-looking cost of providing that element anywhere within the defined zone. While it is impossible to quantify with absolute precision what "significant" deviations of rates from costs are, Sprint believes that differences between rates and costs in excess of $20 \%$ would be of sufficient magnitude to potentially distort competitors' investment decisions. Using that criteria, each incumbent LEC should be required to construct a deaveraged rate schedule such that the average rate in
each zone is no more than $20 \%$ higher or $20 \%$ less than the forward-looking cost of providing that element.
Q. What specific criteria should underlay this Commission's requirements for incumbent LECs to deaverage their unbundled network elements?
A. Sprint would advocate the following criteria:

First, as discussed above, prices for unbundled network elements should be deaveraged to the degree necessary to avoid significant deviations between the rate that is charged for an unbundled network element and the actual forward-looking costs of providing that element in a specific geographic area. This means that the degree of deaveraging can vary both across elements and among incumbent LECs. For example, the costs of providing some unbundled network elements in different geographic areas simply do not vary significantly. There is little or no economic benefit, therefore, in deaveraging the rates for those elements. On the other hand, the forward-looking economic costs of other elements can vary
significantly, as evidenced by the example for unbundled loops cited above. Clearly, those rates should be deaveraged into a sufficient number of zones such that the rate for each zone does not significantly deviate from the actual forward-looking costs of providing that element for any area included in that zone. As such, the number of zones appropriate for the deaveraging of one element is not necessarily the appropriate number of zones for some other element, where the disparity in costs across geographic areas might be substantially more or less.

Moreover, the number of zones appropriate for an unbundled element of one incumbent LEC is not necessarily the appropriate number of zones for that same element provided by another incumbent LEC, where, again, the disparity in costs of providing that element could be substantially more or less.

Second, the degree of rate deaveraging should be based on both administrative considerations and a realistic assessment of the extent to which limited rate averaging would not materially adversely impact
competition and investment decisions. At the extreme, for example, unbundled loop costs differ almost on a customer by customer basis. Customer, or location, specific unbundled loop rates may meet the theoretical ideal of cost-based rates, but they would equally be an administrative nightmare, for both the incumbent LEC as well as competitors ordering unbundled loops. Nor is that degree of deaveraging necessary to provide economically correct pricing signals to new entrants. Typically, a competitor enters the local market with the intention of serving all or a substantial segment of that market, and not just one or two customers.

Some degree of averaging of unbundled element rates does not necessarily distort competitors' investment decisions for several reasons. First, the deviations, both positive and negative, between the averaged rate and the actual forward-looking costs will to some extent be offsetting. Second, and most important, if rates are deaveraged such that there are not significant differences between the average rate and the actual forward-looking costs, the impact of that rate averaging will by definition be minimal and is
unlikely to have a material impact on a competitor's investment decisions.

Third, Sprint proposes that each incumbent develop forward-looking costs, for each UNE to be deaveraged, on a wire center basis. Using the wire center as the unit of cost analysis is reasonable for a number of reasons. The wire center generally conforms to the market definitions and plans of new entrants, and therefore, as previously discussed, averaging costs at this level is not likely to distort their entry or marketing decisions. Moreover, deaveraging costs below the wire center entails not only more complex cost modeling, but would impose significant additional costs on both incumbent LECs and competitors in administering that rate structure.

Fourth, incumbent LECs should be required to group wire centers into zones, and develop rates based on the weighted average cost of the UNE for all wire centers within each zone, subject to the constraint that the average rate for a UNE zone should not deviate by more than $20 \%$ from the wire center forward-
looking cost of that UNE for any wire center included in that zone. However, it would not be unreasonable to permit a wider range of deviation in the highest cost zone, recognizing the larger cost variances in the highest cost areas and the undesirability of creating an excessive number of zones.

Sprint's proposed deaveraging methodology is intended to provide a balance between cost-based rates and administrative ease - both for incumbent LECs and new entrants.

## Sprint-Florida

## Bell South Proposed Banding

## Proposed Deaveraged 2-wire Loop SL1 Rates - Bell South (A.1.1)




| A | B | C | D | E | F |  | H | 1 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | Percent |
| Row | Rate <br> Band | Exchange | Wire Center | Total Lines <br> Served |  | Monthly Cost (TELRIC) |  | Percent of Total Lines In Band | Deviation From Average |
| 99 | 2 |  | WPBHFLLE | 50,482 | \$ | 16.85 | 2.16\% | -15.68\% |
| 100 | 2 |  | LKMRFLMA | 16,002 | \$ | 17.01 | 0.68\% | -14.88\% |
| 101 | 2 |  | PNSCFLBL | 57,961 | \$ | 17.18 | 2.48\% | -14.03\% |
| 102 | 2 |  | ORPKFLRW | 18,247 | \$ | 17.19 | 0.78\% | -13.98\% |
| 103 | 1 |  | JCVLFLBW | 46,851 | \$ | 17.23 | 1.12\% | 8.26\% |
| 104 | 1 |  | JCVLFLRV | 37,729 | \$ | 17.25 | 0.91\% | 8.39\% |
| 105 | 2 |  | DLBHFLKP | 45,726 | \$ | 17.32 | 1.95\% | -13.33\% |
| 106 | 1 |  | BCRTFLSA | 74,410 | \$ | 17.49 | 1.79\% | 9.90\% |
| 107 | 1 |  | MIAMFLNS | 36,258 | \$ | 17.60 | 0.87\% | 10.59\% |
| 108 | 1 |  | FTLDFLJA | 74,436 | \$ | 17.61 | 1.79\% | 10.65\% |
| 109 | 2 |  | WPBHFLGR | 60,813 | \$ | 17.72 | 2.60\% | -11.32\% |
| 110 | 2 |  | GSVLFLNW | 15,578 | \$ | 17.75 | 0.67\% | -11.17\% |
| 111 | 2 |  | EGLLFLIH | 22,251 | \$ | 17.78 | 0.95\% | -11.02\% |
| 112 | 1 |  | ORLDFLPC | 87,212 | \$ | 17.80 | 2.09\% | 11.85\% |
| 113 | 2 |  | MICCFLBB | 7,596 | \$ | 17.85 | 0.32\% | -10.67\% |
| 114 | 2 |  | WPBHFLGA | 104,805 | \$ | 17.86 | 4.48\% | -10.62\% |
| 115 | 1 |  | FTLDFLPL | 72,139 | \$ | 17.87 | 1.73\% | 12.29\% |
| 116 | 2 |  | PNVDFLMA | 24,100 | \$ | 17.97 | 1.03\% | -10.07\% |
| 117 | 1 |  | ORLDFLSA | 42,998 | \$ | 18.01 | 1.03\% | 13.16\% |
| 118 | 1 |  | BYBHFLMA | 77,402 | \$ | 18.04 | 1.86\% | 13.35\% |
| 119 | 1 |  | MIAMFLOL | 32,295 | \$ | 18.07 | 0.78\% | 13.54\% |
| 120 | 1 |  | ORLDFLPH | 117,491 | \$ | 18.26 | 2.82\% | 14.74\% |
| 121 | 1 |  | NDADFLBR | 59,976 | \$ | 18.29 | 1.44\% | 14.92\% |
| 122 | 1 |  | FTLDFLWN | 29,518 | \$ | 18.35 | 0.71\% | 15.30\% |
| 123 | 1 |  | HLWDFLPE | 113,722 | \$ | 18.37 | 2.73\% | 15.43\% |
| 124 | 2 |  | HTISFLMA | 23,535 | \$ | 18.47 | 1.01\% | -7.57\% |
| 125 | 2 |  | COCOFLME | 29,133 | \$ | 18.54 | 1.24\% | -7.22\% |
| 126 | 3 |  | BLGLFLMA | 11,143 | \$ | 18.69 | 2.99\% | -26.81\% |
| 127 | 2 |  | ORPKFLMA | 30,289 | \$ | 18.75 | 1.29\% | -6.17\% |
| 128 | 1 |  | ORLDFLAP | 107,731 | \$ | 18.87 | 2.59\% | 18.57\% |
| 129 | 1 |  | JCBHFLAB | 15,439 | \$ | 18.88 | 0.37\% | 18.63\% |
| 130 | 1 |  | MNDRFLLO | 46,577 | \$ | 18.89 | 1.12\% | 18.69\% |
| 131 | 2 |  | PNCYFLMA | 50,401 | \$ | 18.95 | 2.15\% | -5.17\% |
| 132 | 3 |  | KYLRFLLS | 10,075 | \$ | 19.15 | 2.71\% | -25.01\% |
| 133 | 2 |  | STRTFLMA | 67,365 | \$ | 19.27 | 2.88\% | -3.57\% |
| 134 | 2 |  | DYBHFLPO | 52,960 | \$ | 19.33 | 2.26\% | -3.27\% |
| 135 | 2 |  | DYBHFLOB | 32,859 | \$ | 19.38 | 1.40\% | -3.02\% |
| 136 | 2 |  | PTSLFLSO | 20,109 | \$ | 19.40 | 0.86\% | -2.92\% |
| 137 | 3 |  | STAGFLBS | 13,800 | \$ | 19.40 | 3.71\% | -24.03\% |
| 138 | 1 |  | PRRNFLMA | 116,260 | \$ | 19.57 | 2.79\% | 22.97\% |
| 139 | 2 |  | EGLLFLBG | 49,414 | \$ | 19.70 | 2.11\% | -1.42\% |
| 140 | 2 |  | PNSCFLFP | 61,800 | \$ | 19.71 | 2.64\% | -1.37\% |
| 141 | 1 |  | JCVLFLWC | 45,636 | \$ | 19.82 | 1.10\% | 24.54\% |
| 142 | 2 |  | JPTRFLMA | 57,476 | \$ | 19.98 | 2.46\% | -0.01\% |

Filed: July 31, 2000

| A | B | C | D | E | F |  | H | 1 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | Percen |
| Row | Rate Band | Exchange | Wire Center | Total Lines <br> Served |  | Montify Cost (TELRIC) |  | Percent of Total Lines in Band | Deviation From Average |
| 143 | 2 |  | DBRYFLMA | 8,181 | \$ | 20.00 | 0.35\% | 0.09\% |
| 144 | 2 |  | DBRYFLDL | 16,979 | \$ | 20.23 | 0.73\% | 1.24\% |
| 145 | 3 |  | STAGFLMA | 30,998 | \$ | 20.27 | 8.32\% | -20.63\% |
| 146 | 2 |  | COCOFLMA | 52,359 | \$ | 20.29 | 2.24\% | 1.54\% |
| 147 | 2 |  | DELDFLMA | 28,928 | \$ | 20.34 | 1.24\% | 1.79\% |
| 148 | 2 |  | VRBHFLMA | 52,762 | \$ | 20.40 | 2.25\% | 2.09\% |
| 149 | 1 |  | JCVLFLNO | 36,867 | \$ | 20.51 | 0.89\% | 28.87\% |
| 150 | 3 |  | PAHKFLMA | 3,900 | \$ | 20.71 | 1.05\% | -18.90\% |
| 151 | 3 |  | NSBHFLMA | 43,307 | \$ | 20.75 | 11.63\% | -18.75\% |
| 152 | 2 |  | MLBRFLMA | 105,838 | \$ | 20.81 | 4.52\% | 4.14\% |
| 153 | 2 |  | GLBRFLMC | 19,581 | \$ | 20.83 | 0.84\% | 4.24\% |
| 154 | 2 |  | PNSCFLWA | 35,294 | \$ | 20.83 | 1.51\% | 4.24\% |
| 155 | 2 |  | PCBHFLNT | 31,399 | \$ | 20.88 | 1.34\% | 4.49\% |
| 156 | 3 |  | MRTHFLVE | 15,124 | \$ | 20.97 | 4.06\% | -17.89\% |
| 157 | 2 |  | SNFRFLMA | 60,185 | \$ | 21.05 | 2.57\% | 5.34\% |
| 158 | 2 |  | HBSDFLMA | 12,025 | \$ | 21.06 | 0.51\% | 5.39\% |
| 159 | 3 |  | KYLRFLMA | 10,260 | \$ | 21.16 | 2.76\% | -17.14\% |
| 160 | 1 |  | HMSTFLHM | 39,717 | \$ | 21.27 | 0.95\% | 33.65\% |
| 161 | 3 |  | FLBHFLMA | 5,756 | \$ | 21.33 | 1.55\% | -16.48\% |
| 162 | 2 |  | FTPRFLMA | 63,485 | \$ | 21.69 | 2.71\% | 8.54\% |
| 163 | 3 |  | STAGFLSH | 11,287 | \$ | 21.82 | 3.03\% | -14.56\% |
| 164 | 2 |  | PNSCFLPB | 7,258 | \$ | 21.94 | 0.31\% | 9.79\% |
| 165 | 1 |  | OVIDFLCA | 33,030 | \$ | 21.98 | 0.79\% | 38.11\% |
| 166 | 1 |  | HMSTFLAF | 11,615 | \$ | 22.07 | 0.28\% | 38.68\% |
| 167 | 3 |  | FRBHFLFP | 20,969 | \$ | 22.24 | 5.63\% | -12.91\% |
| 168 | 2 |  | MNDRFLLW | 8,939 | \$ | 22.53 | 0.38\% | 12.75\% |
| 169 | 2 |  | TTVLFLMA | 37,307 | \$ | 22.65 | 1.59\% | 13.35\% |
| 170 | 1 |  | JCVLFLLF | 41,399 | \$ | 22.94 | 0.99\% | 44.14\% |
| 171 | 2 |  | PNCYFLCA | 10,157 | \$ | 22.97 | 0.43\% | 14.95\% |
| 172 | 2 |  | WWSPFLSH | 36,998 | \$ | 22.99 | 1.58\% | 15.05\% |
| 173 | 3 |  | PLCSFLMA | 14,463 | \$ | 23.11 | 3.88\% | -9.51\% |
| 174 | 3 |  | ISLMFLMA | 5,534 | \$ | 23.12 | 1.49\% | -9.47\% |
| 175 | 2 |  | LYHNFLOH | 13,557 | \$ | 23.31 | 0.58\% | 16.65\% |
| 176 | 2 |  | PNSCFLHC | 11,149 | \$ | 23.36 | 0.48\% | 16.90\% |
| 177 | 2 |  | WPBHFLRP | 49,527 | \$ | 24.13 | 2.12\% | 20.75\% |
| 178 | 2 |  | PTSLFLMA | 44,164 | \$ | 24.18 | 1.89\% | 21.00\% |
| 179 | 2 |  | SBSTFLMA | 17,548 | \$ | 24.18 | 0.75\% | 21.00\% |
| 180 | 1 |  | JCVLFLOW | 20,234 | \$ | 24.62 | 0.49\% | 54.70\% |
| 181 | 2 |  | CNTMFLLE | 9,098 | \$ | 26.26 | 0.39\% | 31.41\% |
| 182 | 3 |  | DLSPFLMA | 2,629 | \$ | 26.30 | 0.71\% | 2.99\% |
| 183 | 2 |  | HLNVFLMA | 13,351 | \$ | 26.37 | 0.57\% | 31.96\% |
| 184 | 2 |  | WWSPFLHI | 16,799 | \$ | 26.76 | 0.72\% | 33.91\% |
| 185 | 2 |  | BKVLFLJF | 26,498 | \$ | 27.38 | 1.13\% | 37.02\% |
| 186 | 2 |  | SBSTFLFE | 1,795 | \$ | 27.42 | 0.08\% | 37.22\% |


| A | B | C | D | E | F |  | H | $\qquad$ <br> I <br> Percent Deviation From Average |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |
| Pow | Rate <br> Band | Exchange | Wire Center | Total Lines <br> Served |  | $\begin{aligned} & \text { Monthy } \\ & \text { Cost } \\ & \text { (TEMRIC) } \end{aligned}$ | Percent of Total Lines in Band |  |
| 187 | 3 |  | OKHLFLMA | 2,400 | \$ | 28.22 | 0.64\% | 10.50\% |
| 188 | 2 |  | MLTNFLRA | 23,249 | \$ | 28.41 | 0.99\% | 42.17\% |
| 189 | 2 |  | PACEFLPV | 13,498 | \$ | 28.46 | 0.58\% | 42.42\% |
| 190 | 3 |  | CDKYFLMA | 1,578 | \$ | 28.70 | 0.42\% | 12.38\% |
| 191 | 3 |  | PLTKFLMA | 21,599 | \$ | 29.10 | 5.80\% | 13.95\% |
| 192 | 2 |  | MDBGFLPM | 14,799 | \$ | 30.21 | 0.63\% | 51.18\% |
| 193 | 3 |  | SGKYFLMA | 5,064 | \$ | 30.36 | 1.36\% | 18.88\% |
| 194 | 3 |  | BGPIFLMA | 7,284 | \$ | 30.82 | 1.96\% | 20.68\% |
| 195 | 3 |  | LKCYFLMA | 28,043 | \$ | 30.83 | 7.53\% | 20.72\% |
| 196 | 3 |  | GCSPFLCN | 9,356 | \$ | 31.22 | 2.51\% | 22.25\% |
| 197 | 1 |  | HMSTFLEA | 2,406 | \$ | 31.78 | 0.06\% | 99.69\% |
| 198 | 2 |  | HAVNFLMA | 5,749 | \$ | 32.81 | 0.25\% | 64.19\% |
| 199 | 1 |  | EORNFLMA | 7,067 | \$ | 33.27 | 0.17\% | 109.05\% |
| 200 | 3 |  | KYHGFLMA | 7,390 | \$ | 34.23 | 1.98\% | 34.04\% |
| 201 | 2 |  | DNLNFLWM | 14,736 | \$ | 35.85 | 0.63\% | 79.40\% |
| 202 | 2 |  | YULEFLMA | 4,534 | \$ | 36.22 | 0.19\% | 81.25\% |
| 203 | 3 |  | YNTWFLMA | 3,109 | \$ | 36.52 | 0.83\% | 43.00\% |
| 204 | 2 |  | ARCHFLMA | 3,567 | \$ | 36.92 | 0.15\% | 84.76\% |
| 205 | 3 |  | WELKFLMA | 2,889 | \$ | 37.66 | 0.78\% | 47.47\% |
| 206 | 2 |  | GENVFLMA | 2,898 | \$ | 37.73 | 0.12\% | 88.81\% |
| 207 | 2 |  | STAGFLWG | 1,714 | \$ | 38.73 | 0.07\% | 93.81\% |
| 208 | 3 |  | CHPLFLJA | 6,948 | \$ | 38.79 | 1.87\% | 51.89\% |
| 209 | 3 |  | PMPKFLMA | 3,468 | \$ | 39.30 | 0.93\% | 53.89\% |
| 210 | 3 |  | CFLDFLMA | 6,109 | \$ | 39.86 | 1.64\% | 56.08\% |
| 211 | 2 |  | FTGRFLMA | 1,137 | \$ | 40.23 | 0.05\% | 101.32\% |
| 212 | 3 |  | PRSNFLFD | 3,009 | \$ | 41.20 | 0.81\% | 61.33\% |
| 213 | 2 |  | HWTHFLMA | 4,369 | \$ | 41.30 | 0.19\% | 106.68\% |
| 214 | 3 |  | BNNLFLMA | 7,582 | \$ | 42.67 | 2.04\% | 67.09\% |
| 215 | 2 |  | NWBYFLMA | 4,821 | \$ | 42.76 | 0.21\% | 113.98\% |
| 216 | 2 |  | TRENFLMA | 5,109 | \$ | 43.70 | 0.22\% | 118.69\% |
| 217 | 2 |  | MXVLFLMA | 2,105 | \$ | 44.87 | 0.09\% | 124.54\% |
| 218 | 3 |  | CSCYFLBA | 4,159 | \$ | 46.00 | 1.12\% | 80.13\% |
| 219 | 3 |  | GCVLFLMA | 4,279 | \$ | 48.02 | 1.15\% | 88.04\% |
| 220 | 2 |  | MCNPFLMA | 1,909 | \$ | 49.92 | 0.08\% | 149.81\% |
| 221 | 2 |  | BRSNFLMA | 3,788 | \$ | 50.41 | 0.16\% | 152.26\% |
| 222 | 2 |  | BLDWFLMA | 2,894 | \$ | 51.89 | 0.12\% | 159.67\% |
| 223 | 2 |  | YNFNFLMA | 3,470 | \$ | 53.05 | 0.15\% | 165.48\% |
| 224 | 3 |  | OLTWFLLN | 4,809 | \$ | 53.76 | 1.29\% | 110.51\% |
| 225 | 2 |  | JAY-FLMA | 2,847 | \$ | 63.20 | 0.12\% | 216.27\% |
| 226 | 3 |  | VERNFLMA | 2,040 | \$ | 67.33 | 0.55\% | 163.65\% |
| 227 | 3 |  | SYHSFLCC | 1,759 | \$ | 75.95 | 0.47\% | 197.40\% |
| 228 | 2 |  | MNSNFLMA | 629 | \$ | 115.81 | 0.03\% | 479.54\% |

## Sprint-Florida

Sprint Proposed Banding
Proposed Deaveraged 2-wire Loop SL1 Rates - Bell South (A.1.1)



| A | B | c | D | E | F |  | H | 1 <br> Percent Deviation From Average |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |
| Row | Rate <br> Band | Exchange | Wire Center | Total Lines Served |  | $\begin{aligned} & \text { Monthly, } \\ & \text { Cost } \\ & \text { (TELRIC) } \end{aligned}$ | Percent of <br> Total lines <br> in Band |  |
| 50 | 2 |  | JCVLFLSM | 28,514 | \$ | 12.99 | 1.83\% | -2.13\% |
| 51 | 2 |  | JCVLFLCL | 65,905 | \$ | 13.00 | 4.22\% | -2.05\% |
| 52 | 2 |  | MIAMFLBA | 40,072 | \$ | 13.27 | 2.57\% | -0.02\% |
| 53 | 2 |  | MIAMFLNM | 31,550 | \$ | 13.41 | 2.02\% | 1.04\% |
| 54 | 2 |  | MIAMFLPL | 80,350 | \$ | 13.48 | 5.14\% | 1.57\% |
| 55 | 2 |  | FTLDFLMR | 95,006 | \$ | 13.57 | 6.08\% | 2.24\% |
| 56 | 2 |  | FTLDFLCR | 55,494 | \$ | 13.66 | 3.55\% | 2.92\% |
| 57 | 2 |  | FTLDFLCY | 74,108 | \$ | 13.67 | 4.74\% | 3.00\% |
| 58 | 2 |  | KYWSFLMA | 36,958 | \$ | 13.73 | 2.37\% | 3.45\% |
| 59 | 2 |  | MIAMFLWM | 56,238 | \$ | 13.77 | 3.60\% | 3.75\% |
| 60 | 2 |  | BCRTFLMA | 92,002 | \$ | 14.24 | 5.89\% | 7.29\% |
| 61 | 2 |  | FTLDFLSU | 56,306 | \$ | 14.28 | 3.60\% | 7.59\% |
| 62 | 2 |  | NDADFLAC | 49,809 | \$ | 14.40 | 3.19\% | 8.50\% |
| 63 | 2 |  | HLWDFLMA | 58,648 | \$ | 14.65 | 3.75\% | 10.38\% |
| 64 | 2 |  | FTLDFLSG | 7,202 | \$ | 14.66 | 0.46\% | 10.46\% |
| 65 | 2 |  | JCVLFLIA | 2,429 | \$ | 14.67 | 0.16\% | 10.53\% |
| 66 | 2 |  | FTLDFLOA | 74,347 | \$ | 14.70 | 4.76\% | 10.76\% |
| 67 | 2 |  | FTLDFLAP | 3,146 | \$ | 14.79 | 0.20\% | 11.44\% |
| 68 | 2 |  | CCBHFLMA | 27,668 | \$ | 14.85 | 1.77\% | 11.89\% |
| 69 | 2 |  | BCRTFLBT | 44,746 | \$ | 14.92 | 2.86\% | 12.41\% |
| 70 | 2 |  | NKLRFLMA | 3,293 | \$ | 15.05 | 0.21\% | 13.39\% |
| 71 | 2 |  | MNDRFLAV | 9,752 | \$ | 15.15 | 0.62\% | 14.15\% |
| 72 |  | Band 2 Summary |  | 1,562,066 | \$ | 13.27 | 100\% |  |
| 73 | 3 |  | MIAMFLWD | 64,053 | \$ | 15.17 | 1.43\% | -14.61\% |
| 74 | 3 |  | MIAMFLPB | 51,410 | \$ | 15.19 | 1.15\% | -14.50\% |
| 75 | 3 |  | PMBHFLTA | 45,170 | \$ | 15.23 | 1.01\% | -14.28\% |
| 76 | 3 |  | DYBHFLMA | 62,008 | \$ | 15.35 | 1.39\% | -13.60\% |
| 77 | 3 |  | JCVLFLSJ | 50,208 | \$ | 15.56 | 1.12\% | -12.42\% |
| 78 | 3 |  | DLBHFLMA | 48,601 | \$ | 15.59 | 1.09\% | -12.25\% |
| 79 | 3 |  | PMBHFLMA | 91,941 | \$ | 15.59 | 2.06\% | -12.25\% |
| 80 | 3 |  | MIAMFLSO | 71,368 | \$ | 15.64 | 1.60\% | -11.97\% |
| 81 | 3 |  | DRBHFLMA | 72,583 | \$ | 15.66 | 1.62\% | -11.86\% |
| 82 | 3 |  | JCBHFLSP | 14,428 | \$ | 15.74 | 0.32\% | -11.41\% |
| 83 | 3 |  | PMBHFLFE | 84,965 | \$ | 15.75 | 1.90\% | -11.35\% |
| 84 | 3 |  | MIAMFLAL | 37,334 | \$ | 15.82 | 0.83\% | -10.96\% |
| 85 | 3 |  | MIAMFLHL | 132,181 | \$ | 15.86 | 2.96\% | -10.73\% |
| 86 | 3 |  | JCVLFLFC | 20,197 | \$ | 15.89 | 0.45\% | -10.56\% |
| 87 | 3 |  | MIAMFLCA | 106,289 | \$ | 15.92 | 2.38\% | -10.39\% |
| 88 | 3 |  | NDADFLGG | 39,819 | \$ | 15.95 | 0.89\% | -10.22\% |
| 89 | 3 |  | ORLDFLCL | 53,496 | \$ | 16.10 | 1.20\% | -9.38\% |
| 90 | 3 |  | MIAMFLRR | 63,795 | \$ | 16.13 | 1.43\% | -9.21\% |
| 91 | 3 |  | PMBHFLCS | 93,150 | \$ | 16.16 | 2.08\% | -9.04\% |
| 92 | 3 |  | MIAMFLSH | 43,098 | \$ | 16.26 | 0.96\% | -8.48\% |
| 93 | 3 |  | GSVLFLMA | 130,947 | \$ | 16.31 | 2.93\% | -8.20\% |


| A | B | C | D | E |  | F | H | Percent |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |
| Row |  |  |  | Total |  | Monthly | Percent of | Deviation |
|  | Rate |  |  | Lines |  | Cost | Total lines | From |
|  | Band | Exchange | Wire Center | Served |  | (TELRMC) | In Band | Average |
| 94 | 3 |  | JCVLFLAR | 37,777 | \$ | 16.34 | 0.84\% | -8.03\% |
| 95 | 3 |  | JCBHFLMA | 36,614 | \$ | 16.49 | 0.82\% | -7.18\% |
| 96 | 3 |  | WPBHFLRB | 54,219 | \$ | 16.57 | 1.21\% | -6.73\% |
| 97 | 3 |  | VRBHFLBE | 16,849 | \$ | 16.61 | 0.38\% | -6.51\% |
| 98 | 3 |  | HLWDFLWH | 82,835 | \$ | 16.68 | 1.85\% | -6.12\% |
| 99 | 3 |  | WPBHFLHH | 86,861 | \$ | 16.76 | 1.94\% | -5.66\% |
| 100 | 3 |  | DYBHFLOS | 9,107 | \$ | 16.80 | 0.20\% | -5.44\% |
| 101 | 3 |  | WPBHFLLE | 50,482 | \$ | 16.85 | 1.13\% | -5.16\% |
| 102 | 3 |  | LKMRFLMA | 16,002 | \$ | 17.01 | 0.36\% | -4.26\% |
| 103 | 3 |  | PNSCFLBL | 57,961 | \$ | 17.18 | 1.30\% | -3.30\% |
| 104 | 3 |  | ORPKFLRW | 18,247 | \$ | 17.19 | 0.41\% | -3.24\% |
| 105 | 3 |  | JCVLFLBW | 46,851 | \$ | 17.23 | 1.05\% | -3.02\% |
| 106 | 3 |  | JCVLFLRV | 37,729 | \$ | 17.25 | 0.84\% | -2.91\% |
| 107 | 3 |  | DLBHFLKP | 45,726 | \$ | 17.32 | 1.02\% | -2.51\% |
| 108 | 3 |  | BCRTFLSA | 74,410 | \$ | 17.49 | 1.66\% | -1.56\% |
| 109 | 3 |  | MIAMFLNS | 36,258 | \$ | 17.60 | 0.81\% | -0.94\% |
| 110 | 3 |  | FTLDFLJA | 74,436 | \$ | 17.61 | 1.66\% | -0.88\% |
| 111 | 3 |  | WPBHFLGR | 60,813 | \$ | 17.72 | 1.36\% | -0.26\% |
| 112 | 3 |  | GSVLFLNW | 15,578 | \$ | 17.75 | 0.35\% | -0.09\% |
| 113 | 3 |  | EGLLFLIH | 22,251 | \$ | 17.78 | 0.50\% | 0.08\% |
| 114 | 3 |  | ORLDFLPC | 87,212 | \$ | 17.80 | 1.95\% | 0.19\% |
| 115 | 3 |  | MICCFLBB | 7,596 | \$ | 17.85 | 0.17\% | 0.47\% |
| 116 | 3 |  | WPBHFLGA | 104,805 | \$ | 17.86 | 2.34\% | 0.53\% |
| 117 | 3 |  | FTLDFLPL | 72,139 | \$ | 17.87 | 1.61\% | 0.58\% |
| 118 | 3 |  | PNVDFLMA | 24,100 | \$ | 17.97 | 0.54\% | 1.15\% |
| 119 | 3 |  | ORLDFLSA | 42,998 | \$ | 18.01 | 0.96\% | 1.37\% |
| 120 | 3 |  | BYBHFLMA | 77,402 | \$ | 18.04 | 1.73\% | 1.54\% |
| 121 | 3 |  | MIAMFLOL | 32,295 | \$ | 18.07 | 0.72\% | 1.71\% |
| 122 | 3 |  | ORLDFLPH | 117,491 | \$ | 18.26 | 2.63\% | 2.78\% |
| 123 | 3 |  | NDADFLBR | 59,976 | \$ | 18.29 | 1.34\% | 2.95\% |
| 124 | 3 |  | FTLDFLWN | 29,518 | \$ | 18.35 | 0.66\% | 3.28\% |
| 125 | 3 |  | HLWDFLPE | 113,722 | \$ | 18.37 | 2.54\% | 3.40\% |
| 126 | 3 |  | HTISFLMA | 23,535 | \$ | 18.47 | 0.53\% | 3.96\% |
| 127 | 3 |  | COCOFLME | 29,133 | \$ | 18.54 | 0.65\% | 4.35\% |
| 128 | 3 |  | BLGLFLMA | 11,143 | \$ | 18.69 | 0.25\% | 5.20\% |
| 129 | 3 |  | ORPKFLMA | 30,289 | \$ | 18.75 | 0.68\% | 5.54\% |
| 130 | 3 |  | ORLDFLAP | 107,731 | \$ | 18.87 | 2.41\% | 6.21\% |
| 131 | 3 |  | JCBHFLAB | 15,439 | \$ | 18.88 | 0.35\% | 6.27\% |
| 132 | 3 |  | MNDRFLLO | 46,577 | \$ | 18.89 | 1.04\% | 6.32\% |
| 133 | 3 |  | PNCYFLMA | 50,401 | \$ | 18.95 | 1.13\% | 6.66\% |
| 134 | 3 |  | KYLRFLLS | 10,075 | \$ | 19.15 | 0.23\% | 7.79\% |
| 135 | 3 |  | STRTFLMA | 67,365 | \$ | 19.27 | 1.51\% | 8.46\% |
| 136 | 3 |  | DYBHFLPO | 52,960 | \$ | 19.33 | 1.18\% | 8.80\% |
| 137 | 3 |  | DYBHFLOB | 32,859 | \$ | 19.38 | 0.73\% | 9.08\% |



| A | B | C | D | E |  | F | H | Percent Deviation From Average |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |
| Row | Rate Eand | Exchange | Wire Center | Total Lines <br> Served |  | $\begin{aligned} & \text { Monthly } \\ & \text { Cost } \\ & \text { TELRLC) } \end{aligned}$ | Percent of Total Lines in Band |  |
| 182 | 4 |  | SBSTFLMA | 17,548 | \$ | 24.18 | 3.06\% | 1.59\% |
| 183 | 4 |  | JCVLFLOW | 20,234 | \$ | 24.62 | 3.53\% | 3.44\% |
| 184 | 4 |  | CNTMFLLE | 9,098 | \$ | 26.26 | 1.59\% | 10.33\% |
| 185 | 4 |  | DLSPFLMA | 2,629 | \$ | 26.30 | 0.46\% | 10.50\% |
| 186 | 4 |  | HLNVFLMA | 13,351 | \$ | 26.37 | 2.33\% | 10.79\% |
| 187 | 4 |  | WWSPFLHI | 16,799 | \$ | 26.76 | 2.93\% | 12.43\% |
| 188 | 4 |  | BKVLFLJF | 26,498 | \$ | 27.38 | 4.62\% | 15.03\% |
| 189 | 4 |  | SBSTFLFE | 1,795 | \$ | 27.42 | 0.31\% | 15.20\% |
| 190 | 4 |  | OKHLFLMA | 2,400 | \$ | 28.22 | 0.42\% | 18.56\% |
| 191 | 4 |  | MLTNFLRA | 23,249 | \$ | 28.41 | 4.05\% | 19.36\% |
| 192 | 4 |  | PACEFLPV | 13,498 | \$ | 28.46 | 2.35\% | 19.57\% |
| 193 |  | Band 4 Summary |  | 573,693 | \$ | 23.80 | 100\% |  |
| 194 | 5 |  | CDKYFLMA | 1,578 | \$ | 28.70 | 1.05\% | -11.73\% |
| 195 | 5 |  | PLTKFLMA | 21,599 | \$ | 29.10 | 14.33\% | -10.50\% |
| 196 | 5 |  | MDBGFLPM | 14,799 | \$ | 30.21 | 9.82\% | -7.08\% |
| 197 | 5 |  | SGKYFLMA | 5,064 | \$ | 30.36 | 3.36\% | -6.62\% |
| 198 | 5 |  | BGPIFLMA | 7,284 | \$ | 30.82 | 4.83\% | -5.21\% |
| 199 | 5 |  | LKCYFLMA | 28,043 | \$ | 30.83 | 18.60\% | -5.18\% |
| 200 | 5 |  | GCSPFLCN | 9,356 | \$ | 31.22 | 6.21\% | -3.98\% |
| 201 | 5 |  | HMSTFLEA | 2,406 | \$ | 31.78 | 1.60\% | -2.26\% |
| 202 | 5 |  | HAVNFLMA | 5,749 | \$ | 32.81 | 3.81\% | 0.91\% |
| 203 | 5 |  | EORNFLMA | 7,067 | \$ | 33.27 | 4.69\% | 2.33\% |
| 204 | 5 |  | KYHGFLMA | 7,390 | \$ | 34.23 | 4.90\% | 5.28\% |
| 205 | 5 |  | DNLNFLWM | 14,736 | \$ | 35.85 | 9.78\% | 10.26\% |
| 206 | 5 |  | YULEFLMA | 4,534 | \$ | 36.22 | 3.01\% | 11.40\% |
| 207 | 5 |  | YNTWFLMA | 3,109 | \$ | 36.52 | 2.06\% | 12.32\% |
| 208 | 5 |  | ARCHFLMA | 3,567 | \$ | 36.92 | 2.37\% | 13.55\% |
| 209 | 5 |  | WELKFLMA | 2,889 | \$ | 37.66 | 1.92\% | 15.83\% |
| 210 | 5 |  | GENVFLMA | 2,898 | \$ | 37.73 | 1.92\% | 16.04\% |
| 211 | 5 |  | STAGFLWG | 1,714 | \$ | 38.73 | 1.14\% | 19.12\% |
| 212 | 5 |  | CHPLFLJA | 6,948 | \$ | 38.79 | 4.61\% | 19.30\% |
| 213 |  | Band 5 Summary |  | 150,730 | \$ | 32.51 | 100\% |  |
| 214 | 6 |  | PMPKFLMA | 3,468 | \$ | 39.30 | 5.50\% | -13.20\% |
| 215 | 6 |  | CFLDFLMA | 6,109 | \$ | 39.86 | 9.69\% | -11.96\% |
| 216 | 6 |  | FTGRFLMA | 1,137 | \$ | 40.23 | 1.80\% | -11.15\% |
| 217 | 6 |  | PRSNFLFD | 3,009 | \$ | 41.20 | 4.77\% | -9.00\% |
| 218 | 6 |  | HWTHFLMA | 4,369 | \$ | 41.30 | 6.93\% | -8.78\% |
| 219 | 6 |  | BNNLFLMA | 7,582 | \$ | 42.67 | 12.03\% | -5.76\% |
| 220 | 6 |  | NWBYFLMA | 4,821 | \$ | 42.76 | 7.65\% | -5.56\% |
| 221 | 6 |  | TRENFLMA | 5,109 | \$ | 43.70 | 8.11\% | -3.48\% |
| 222 | 6 |  | MXVLFLMA | 2,105 | \$ | 44.87 | 3.34\% | -0.90\% |
| 223 | 6 |  | CSCYFLBA | 4,159 | \$ | 46.00 | 6.60\% | 1.60\% |
| 224 | 6 |  | GCVLFLMA | 4,279 | \$ | 48.02 | 6.79\% | 6.06\% |
| 225 | 6 |  | MCNPFLMA | 1,909 | \$ | 49.92 | 3.03\% | 10.26\% |



Filed: July 31, 2000

## Sprint-Florida

GTE Proposed Banding
Proposed Deaveraged 2-wire Loop Rates - GTE


| A | B | C | D | E | F |  | H | 1 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | Percent Deviation From Average |
| Row | Rate <br> Band | Exchange | Wite Centar | Total Lines <br> Served |  | Monthiy Cost (TELPNC) |  | Percent of Total Limes In Band |
| 55 | 1 |  | PSDNFLXA34H | 36,607 | \$ | 21.60 | 2.64\% | 4.26\% |
| 56 | 1 |  | LRGOFLXA58H | 42,465 | \$ | 21.69 | 3.06\% | 4.70\% |
| 57 | 1 |  | BRBAFLXA75H | 54,396 | \$ | 22.16 | 3.92\% | 6.97\% |
| 58 | 1 |  | SLSPFLXA93H | 37,112 | \$ | 22.41 | 2.67\% | 8.17\% |
| 59 | 1 |  | DNDNFLXA73H | 26,932 | \$ | 22.46 | 1.94\% | 8.41\% |
| 60 | 1 |  | WLCRFLXA83H | 35,882 | \$ | 22.46 | 2.58\% | 8.41\% |
| 61 | 1 |  | STGRFLXA78H | 57,595 | \$ | 22.60 | 4.15\% | 9.09\% |
| 62 | 1 |  | ENWDFLXA47H | 23,000 | \$ | 22.76 | 1.66\% | 9.86\% |
| 63 | 1 |  | NGBHFLXA39H | 53,643 | \$ | 22.82 | 3.86\% | 10.15\% |
| 64 | 1 |  | SMNLFLXA23H | 20,525 | \$ | 22.96 | 1.48\% | 10.83\% |
| 65 | 1 |  | BAYUFLXA54H | 37,790 | \$ | 23.24 | 2.72\% | 12.18\% |
| 66 | 1 |  | LLMNFLXADSO | 44,963 | \$ | 23.45 | 3.24\% | 13.19\% |
| 67 | 1 |  | SKWYFLXADSO | 29,298 | \$ | 23.55 | 2.11\% | 13.67\% |
| 68 | 1 |  | CYGRFLXA32H | 13,303 | \$ | 23.60 | 0.96\% | 13.92\% |
| 69 | 1 |  | VENCFLXA48H | 32,585 | \$ | 23.86 | 2.35\% | 15.17\% |
| 70 | 1 |  | PLSLFLXA79H | 26,333 | \$ | 24.04 | 1.90\% | 16.04\% |
| 71 | 1 |  | SSDSFLXA92H | 49,848 | \$ | 24.05 | 3.59\% | 16.09\% |
|  |  | and 1 Summary |  | 1,388,360 | \$ | 20.72 | 100\% |  |
| 73 | 2 |  | YBCTFLXA24H | 15,542 | \$ | 24.18 | 1.62\% | -11.80\% |
| 74 | 2 |  | OLDSFLXA85H | 19,120 | \$ | 24.73 | 2.00\% | -9.80\% |
| 75 | 2 |  | LKLDFLXA68H | 48,819 | \$ | 24.79 | 5.10\% | -9.58\% |
| 76 | 2 |  | BRTNFLXX74H | 41,173 | \$ | 24.84 | 4.30\% | -9.40\% |
| 77 | 2 |  | SPRGFLXA37H | 34,120 | \$ | 24.98 | 3.57\% | -8.89\% |
| 78 | 2 |  | NRSDFLXA35H | 28,449 | \$ | 24.96 | 2.97\% | -8.96\% |
| 79 | 2 |  | WNHNFLXC29H | 35,872 | \$ | 24.98 | 3.75\% | -8.89\% |
| 80 | 2 |  | CRWDFLXA96H | 61,012 | \$ | 25.09 | 6.38\% | -8.49\% |
| 81 | 2 |  | NPRCFLXA84H | 56,827 | \$ | 25.26 | 5.94\% | -7.87\% |
| 82 | 2 |  | VENCFLXSDSO | 22,884 | \$ | 25.56 | 2.39\% | -6.77\% |
| 83 | 2 |  | BRNDFLXA68H | 75,862 | \$ | 25.68 | 7.93\% | -6.33\% |
| 84 | 2 |  | BYSHFLXA84H | 1,694 | \$ | 25.80 | 0.18\% | -5.90\% |
| 85 | 2 |  | TRSPFLXA93H | 43,366 | \$ | 25.94 | 4.53\% | -5.39\% |
| 86 | 2 |  | HGLDFLXA64H | 34,998 | \$ | 26.02 | 3.66\% | -5.09\% |
| 87 | 2 |  | LKLDFLXE66H | 21,085 | \$ | 26.46 | 2.20\% | -3.49\% |
| 88 | 2 |  | TAMPFLXEDS0 | 42,757 | \$ | 26.58 | 4.47\% | -3.05\% |
| 89 | 2 |  | LUTZFLXA94H | 16,539 | \$ | 26.69 | 1.73\% | -2.65\% |
| 90 | 2 |  | BARTFLXA53H | 14,510 | \$ | 27.00 | 1.52\% | -1.52\% |
| 91 | 2 |  | OSPRFLXA96H | 10,127 | \$ | 27.21 | 1.06\% | -0.75\% |
| 92 | 2 |  | HDSNFLXA86H | 38,946 | \$ | 27.60 | 4.07\% | 0.67\% |
| 93 | 2 |  | WLCHFLXA97H | 15,966 | \$ | 28.77 | 1.67\% | 4.94\% |
| 94 | 2 |  | ABDLFLXA96H | 14,379 | \$ | 28.85 | 1.50\% | 5.23\% |
| 95 | 2 |  | ZPHYFLXA78H | 32,465 | \$ | 29.03 | 3.39\% | 5.89\% |
| 96 | 2 |  | PLMTFLXA72H | 24,795 | \$ | 29.31 | 2.59\% | 6.91\% |
| 97 | 2 |  | HNCYFLXA42H | 16,240 | \$ | 30.18 | 1.70\% | 10.08\% |
| 98 | 2 |  | LKWLFLXA67H | 14,313 | \$ | 31.12 | 1.50\% | 13.51\% |



Sprint-Florida
Sprint Proposed Banding Proposed Deaveraged 2-wire Loop Rates - GTE
A
Rate Banding Summary

Rate Band Detail (Sorted by Monthly Cost)
Common Cos
18.10\%


| A | B | C | D | E | F |  | H | $\frac{1}{\text { Percent }}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |
| Row | Rate <br> Band | Exchange | Whie Center | Total Lines <br> Served |  | Monthly: Cost wt Common (TELRIC) | Percent of Total Lines in gand | Deviation From Aversge |
| 53 | 2 |  | LGBKFLXA38H | 12,438 | \$ | 24.75 | 1.00\% | -1.07\% |
| 54 | 2 |  | SWTHFLXA88H | 52,600 | \$ | 24.87 | 4.24\% | -0.60\% |
| 55 | 2 |  | SPBGFLXS86H | 25,132 | \$ | 25.38 | 2.03\% | 1.43\% |
| 56 | 2 |  | PSDNFLXA34H | 36,607 | \$ | 25.51 | 2.95\% | 1.95\% |
| 57 | 2 |  | LRGOFLXA58H | 42,465 | \$ | 25.62 | 3.42\% | 2.37\% |
| 58 | 2 |  | BRBAFLXA75H | 54,396 | \$ | 26.17 | 4.39\% | 4.59\% |
| 59 | 2 |  | SLSPFLXA93H | 37,112 | \$ | 26.47 | 2.99\% | 5.77\% |
| 60 | 2 |  | DNDNFLXA73H | 26,932 | \$ | 26.53 | 2.17\% | 6.01\% |
| 61 | 2 |  | WLCRFLXA83H | 35,882 | \$ | 26.53 | 2.89\% | 6.01\% |
| 62 | 2 |  | STGRFLXA78H | 57,595 | \$ | 26.69 | 4.64\% | 6.67\% |
| 63 | 2 |  | ENWDFLXA47H | 23,000 | \$ | 26.88 | 1.85\% | 7.42\% |
| 64 | 2 |  | NGBHFLXA39H | 53,643 | \$ | 26.95 | 4.32\% | 7.71\% |
| 65 | 2 |  | SMNLFLXA23H | 20,525 | \$ | 27.12 | 1.65\% | 8.37\% |
| 66 | 2 |  | BAYUFLXA54H | 37,790 | \$ | 27.45 | 3.05\% | 9.69\% |
| 67 | 2 |  | LLMNFLXADSO | 44,963 | \$ | 27.69 | 3.62\% | 10.68\% |
| 68 | 2 |  | SKWYFLXADSO | 29,298 | \$ | 27.81 | 2.36\% | 11.15\% |
| 69 | 2 |  | CYGRFLXA32H | 13,303 | \$ | 27.87 | 1.07\% | 11.39\% |
| 70 | 2 |  | VENCFLXA48H | 32,585 | \$ | 28.18 | 2.63\% | 12.61\% |
| 71 | 2 |  | PLSLFLXA79H | 26,333 | \$ | 28.39 | 2.12\% | 13.46\% |
| 72 |  | Band 2 Summary |  | 1,240,389 | \$ | 25.02 | 100\% |  |
| 73 | 3 |  | SSDSFLXA92H | 49,848 | \$ | 28.40 | 5.69\% | -8.68\% |
| 74 | 3 |  | YBCTFLXA24H | 15,542 | \$ | 28.56 | 1.77\% | -8.19\% |
| 75 | 3 |  | OLDSFLXA85H | 19,120 | \$ | 29.21 | 2.18\% | -6.10\% |
| 76 | 3 |  | LKLDFLXA68H | 48,819 | \$ | 29.28 | 5.57\% | -5.87\% |
| 77 | 3 |  | BRTNFLXX74H | 41,173 | \$ | 29.34 | 4.70\% | -5.68\% |
| 78 | 3 |  | SPRGFLXA37H | 34,120 | \$ | 29.50 | 3.89\% | -5.15\% |
| 79 | 3 |  | NRSDFLXA35H | 28,449 | \$ | 29.48 | 3.24\% | -5.23\% |
| 80 | 3 |  | WNHNFLXC29H | 35,872 | \$ | 29.50 | 4.09\% | -5.15\% |
| 81 | 3 |  | CRWDFLXA96H | 61,012 | \$ | 29.63 | 6.96\% | -4.73\% |
| 82 | 3 |  | NPRCFLXA84H | 56,827 | \$ | 29.83 | 6.48\% | -4.09\% |
| 83 | 3 |  | VENCFLXSDSO | 22,884 | \$ | 30.19 | 2.61\% | -2.95\% |
| 84 | 3 |  | BRNDFLXA68H | 75,862 | \$ | 30.33 | 8.65\% | -2.49\% |
| 85 | 3 |  | BYSHFLXA84H | 1,694 | \$ | 30.47 | 0.19\% | -2.04\% |
| 86 | 3 |  | TRSPFLXA93H | 43,366 | \$ | 30.64 | 4.95\% | -1.51\% |
| 87 | 3 |  | HGLDFLXA64H | 34,998 | \$ | 30.73 | 3.99\% | -1.20\% |
| 88 | 3 |  | LKLDFLXE66H | 21,085 | \$ | 31.25 | 2.40\% | 0.47\% |
| 89 | 3 |  | TAMPFLXEDS0 | 42,757 | \$ | 31.39 | 4.88\% | 0.92\% |
| 90 | 3 |  | LUTZFLXA94H | 16,539 | \$ | 31.52 | 1.89\% | 1.34\% |
| 91 | 3 |  | BARTFLXA53H | 14,510 | \$ | 31.89 | 1.66\% | 2.52\% |
| 92 | 3 |  | OSPRFLXA96H | 10,127 | \$ | 32.14 | 1.16\% | 3.32\% |
| 93 | 3 |  | HDSNFLXA86H | 38,946 | \$ | 32.60 | 4.44\% | 4.80\% |
| 94 | 3 |  | WLCHFLXA97H | 15,966 | \$ | 33.98 | 1.82\% | 9.24\% |
| 95 | 3 |  | ABDLFLXA96H | 14,379 | \$ | 34.07 | 1.64\% | 9.54\% |
| 96 | 3 |  | ZPHYFLXA78H | 32,465 | \$ | 34.28 | 3.70\% | 10.23\% |

Filed: July 31, 2000


