Exhibit 2

الم Q. PLEASE COMMENT ON THE CLAIMED INVESTMENT ERROR

A. Ms. Pitts notes on page 13, lines 2 - 4 that BellSouth's Class Modem 3 Resource Card investment should have discounted instead of being included 4 at list price. Ms. Pitts is correct that a discount should have been applied.⁹ 5 On page 13, lines 11 - 14 Ms. Pitts claims that "it appears that at least one 6 technology's investments included 'loadings' and costs for 'associated 7 resources'. It is probable that some of these associated resources are double 8 counted here and again in the telco installation factor, and/or other factors." 9 The conjecture that these "associated resources" are double counted is 10 without basis and is not true. Based on information provided by Lucent, 11 these "associated resources" are switch cabinets, which are not included in 12 any other BellSouth factors. 13 14 15 **Q. PLEASE COMMENT ON THE CLAIMED CAPACITY ERRORS.** 16 17 A. Ms. Pitts claims on page 14, lines 7 - 11 that BellSouth's use of two Call 18 19 Waiting tone circuits is incorrect, but an examination of the SCIS/IN formulas shows that the two circuits is correct. 20 21 Ms. Pitts claims on page 14, lines 12 - 16 that BellSouth's estimate for the 22 number of lines sharing a CLASS modem card is too low. Upon further 23 evaluation, the number of lines sharing a CLASS modem card from should be 24

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⁹ The correct blended discount should be applied to all hardware investments taken from SCIS, not Ms. Pitts' hypothetical replacement only discount.

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changed from 76.8 to 435.75. The revised number of lines reflects 1 utilization, so the utilization input for the CLASS modem should be 100% 2 3 The capacities for the SAS announcement circuit should be modified based on 4 new information from the switch vendor as reflected in my exhibit JHP-03. 5 6 The following summarizes the proposed CCS capacity modifications: 7 *** Begin Proprietary *** 8 Equipment Item Vendor From CCS To CCS 6-port Conference Circuit 105 125 Nortel 250 210 3-port Conference Circuit Nortel 732 300 DSU2/SAS/BRCS Lucent 420 336 Lucent 6-port Conference Circuit 3-port Conference Circuit 840 924 Lucent *** End Proprietary *** 9 10 Q. PLEASE COMMENT ON THE CLAIMED UTILIZATION ERRORS. 11 12 A. Ms. Pitts notes, on p. 15 lines 5 - 6, that the values for CCS capacity taken 13 from the SCIS hardware tables already reflect utilization, and that it would 14 not be appropriate to apply a utilization factor in cases where these values are 15 used. Upon further examination of the hardware study inputs, BellSouth 16 agrees that the utilization inputs should be changed from 85% to 100% on the 17 following items of equipment: 18 19 4000/

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Nortei	100%
Nortel	100%
Nortel	100%
Lucent	100%
Lucent	100%
Nortel	100%
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	A	В	С	D	E	F	G	H		J
1			DN	IS						•
									Utilized	
			Discount			Capacity			Investment (per	
	Equipment	Material \$	Rate	E&I	Total	(CCS)	\$/Unit	Utilization	CCS)	Source
-	Variable Announcement	\$ 11,725.00	0% \$		\$ 11,934.96	77.4		85%		0
	6-port Conference Circuit	\$ 4,020.00	0% \$	V99885/077777777777777777777777777777777777	· · · · · · · · · · · · · · · · · · ·	125		100%		Nortel
	3-port Conference Circuit	\$ 4,020.00	0% \$		\$ 4,087.86	250		100%		Nortel
	Call Waiting Tone	\$ 1,581.90	76% \$	71.26	\$ 450.92	18	\$ 24.51	100%		SCIS/IN
	Average								\$ 63.74	-
8										
9			5E\$	55						
						.			Utilized	
			Discount		T _4_1	Capacity	*01 _1		Investment (per	
	Equipment	Material \$	Rate	E&I	Total	(CCS)	\$/Unit	Utilization	CCS)	~ •
	30-Second Announcement	\$ 7,000.00	0% \$		\$ 7,680.00	288		85%	· · · · · · · · · · · · · · · · · · ·	Lucent
	60-Second Announcement	\$ 7,000.00	0% \$		\$ 7,680.00	288		85%	Sector and the sector of the s	Lucent
	DSU2/SAS/BRCS	\$ 23,000.00	0% \$			732		85% 100%		Lucent
	6-port Conference Circuit	\$ 37,000.00 \$ 37,000.00	4 /9 4	a state	\$ 41,600.00 \$ 41,600.00	338	and all all all the second	100%		Lucent Lucent
	3-port Conference Circuit	\$ 37,000.00	U70 ֆ	4,000.00	\$ 41,000.00 J	§ 824	φ 40.0Z	100%	\$ 45.02 \$ 54.17	Lucent
16 17	Average								\$ 54.17	
18										
10									Utilized	
			Discount			Capacity			Investment (per	
19	Equipment	Material \$	Rate	E&I	Total	(Lines)	\$/Unit	Utilization	Lines)	
	DMS	material \$	INALG	L.01	iviai	(Ellico)	ψιστης	Junzauon	LIIICSJ	
	Class Modem Card	\$ 5,490.00	76% \$		\$ 1,317.60	435.75	\$ 3.02	100%	\$ 3.02	SCIS/IN

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