

**ORIGINAL**

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September 12, 2000

**VIA FEDERAL EXPRESS**

Blanca S. Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Re: The Coalition's Motion For Leave To File Corrected Exhibit in  
Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of the Coalition's Motion For Leave To File Corrected Exhibit. Please date stamp and return the extra copy to us in the enclosed self addressed, postage paid envelope.

Please feel free to contact me if you have any questions or require further information.

Sincerely yours,



Michael C. Sloan  
Counsel for the Coalition

Enclosures

cc: All Parties of Record  
John Spilman  
Hope G. Colantonio  
Mike Gallagher

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG \_\_\_\_\_  
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OTH \_\_\_\_\_

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FPSC-RECORDS/REPORTING

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of )  
Unbundled Network Elements )  
\_\_\_\_\_ ) Docket No. 990649-TP  
Filed: September 12, 2000

THE COALITION'S MOTION FOR LEAVE  
TO FILE CORRECTED EXHIBIT

Broadslate Networks of Florida, Inc., Cleartel Communications, Inc. and Florida Digital Network, Inc. (collectively, "The Coalition"), respectfully moves for leave to file corrections to Exhibit EM\_6 of Eric McPeak's Testimony filed July 31, 2000. A copy of the corrected exhibit is attached hereto as Exhibit EM\_6.

In this motion, the Coalition seeks to correct Column E of the spreadsheet where some of the formulas have been changed resulting in different work times.

The Coalition seeks leave to file the corrected exhibit so that the Commission and the parties will have notice of this change prior to the hearing.

Respectfully submitted this 12<sup>th</sup> day of September, 2000.



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Counsel for The Coalition.

**EXHIBIT EM\_6**

	A	B	C	D	E	F	G	H	I	J	K
1											
2	Index Sheet										
3	Study Period: 2000-2002										
4											
5											
6											
7											
8											
9			<b>Sheet Name:</b>	<b>Description:</b>							
10			Index	Unbundled Loop Modification							
11			Nonrecurring Labor:	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES							
12			WP100	UNBUNDLED LOOP MODIFICATION							
13			WP200	UNBUNDLED LOOP MODIFICATION-RECOVERY							
14											
15											
16											
17											
18											
19											

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
1	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES															
2																
3	Instructions:															
4	1. Use this worksheet to record nonrecurring labor times to be input into the Calculator calculations.															
5	2. All amounts shown are per unit (e.g., per call, per loop, per MOU).															
6	3. Input data, by Cost Element, leaving no blank lines. On next row after last line of data, type END in Cost Element Column.															
7	4. All data on this form should be cell-referenced to study workpapers.															
8	5. Do NOT change columns, headings, sheet name.															
9	6. Use columns F & G when cost element has a single nonrecurring cost; use columns H, I, J, & K for elements with a first and additional nonrecurring cost; use columns L, M, N & O for elements with an initial and subsequent nonrecurring cost.															
10	7. Input Cost Element Life (in months) on first row of data for each cost element. It is not necessary to repeat on each line.															
11																
12																
13																
14																
15	Study Mid-Point Date (Mos.)		6/1/01													
16																
17																
18																
19																
20		State	Cost Element #	Cost Element Life (Mo)	Labor Expense Description (Limited to 25 characters)	JFC/Payband	(For use w/ one NR) Installation Time (Hours)	Disconnect Time (Hours)	First Installation Time (Hours)	First Disconnect Time (Hours)	Additional Installation Time (Hours)	Additional Disconnect Time (Hours)	Initial Installation Time (Hours)	Initial Disconnect Time (Hours)	Subsequent Installation Time (Hours)	Subsequent Disconnect Time (Hours)
21	FL	A.17.1			SERVICE INQUIRY	SDWC	0.0100									
22	FL	A.17.1			SERVICE INQUIRY	230X	0.0100									
23	FL	A.17.1			ENGINEERING	JG57	0.0200									
24	FL	A.17.1			ENGINEERING	WS10	0.0200									
25	FL	A.17.1			ENGINEERING	4M1X	0.0200									
26	FL	A.17.1			CONNECT & TURN-UP TEST	420X	0.0416									
27	FL	A.17.1			CONNECT & TURN-UP TEST	420X	0.0388									
28	FL	A.17.1			TRAVEL	420X	0.0100									
29	FL	A.17.2			SERVICE INQUIRY	SDWC			0.0100							
30	FL	A.17.2			SERVICE INQUIRY	230X			0.0100							
31	FL	A.17.2			ENGINEERING	JG57			0.0200							
32	FL	A.17.2			ENGINEERING	WS10			0.0200							
33	FL	A.17.2			ENGINEERING	4M1X			0.0100							
34	FL	A.17.2			CONNECT & TURN-UP TEST	420X			0.0693		0					
35	FL	A.17.2			CONNECT & TURN-UP TEST	420X			0.0323		0					
36	FL	A.17.2			TRAVEL	420X			0.0100							
37	FL	A.17.3			SERVICE INQUIRY	SDWC	0.0250									
38	FL	A.17.3			SERVICE INQUIRY	230X	0.0250									
39	FL	A.17.3			ENGINEERING	JG57	0.0200									
40	FL	A.17.3			ENGINEERING	WS10	0.0100									
41	FL	A.17.3			ENGINEERING	4M1X	0.0100									
42	FL	A.17.3			CONNECT & TURN-UP TEST	420X	0.0500									
43	FL	A.17.3			CONNECT & TURN-UP TEST	420X	0.0380									
44	FL	A.17.3			CONNECT & TURN-UP TEST	420X	0.0000									
45	FL	A.17.3			CONNECT & TURN-UP TEST	420X	0.0000									
46	FL	A.17.3			TRAVEL	420X	0.0100									
47	FL	A.17.4			SERVICE INQUIRY	SDWC			0.0171		0.0856					
48	FL	A.17.4			SERVICE INQUIRY	230X			0.0171		0.1712					
49	FL	A.17.4			ENGINEERING	JG57			0.0342		0.3423					
50	FL	A.17.4			ENGINEERING	WS10			0.0342		0.5135					
51	FL	A.17.4			ENGINEERING	4M1X			0.0342		0.1712					
52	FL	A.17.4			CONNECT & TURN-UP TEST	420X			0.0712		1.4557					
53	FL	A.17.4			CONNECT & TURN-UP TEST	420X			0.0664		0.1258					
54	FL	A.17.4			TRAVEL	420X			0.0171		0.0856					
55																
56																
57																
58																
59																
60																
61	END															
62																
63	Maximum of 25 entries per Cost Element #															

A	B	C	D	E	F	G	
1	<b>NONRECURRING COST STUDY INPUT - VERSION 2.0</b>						
2	<b>UNBUNDLED LOOP MODIFICATION</b>	<b>LOAD COIL/EQUIPMENT REMOVAL PER PAIR (designed circuit) - LOOPS UP TO 18KFT.</b>			<b>ASSUMES MANUAL SERVICE INQUIRY PROCESS</b>		
3	Study Period: 2000-2002						
4	DISCONNECT LOCATION LIFE (MOS.):	N/A					
5							
6	STATE:	FL					
7	COST ELEMENT #:	A-17.1					
8							
9							
10	<b>DESCRIPTION</b>	<b>WORK CENTERS / WORK ACTIVITIES</b>	<b>SME</b>	<b>JFC</b>	<b>FIRST INSTALL</b>	<b>FIRST DISCONNECT</b>	<b>ADDTL INSTALL</b>
11	SERVICE INQUIRY	CRSG/Acct Team receives Service Inquiry (SI) from CLEC; forwards to OSPE for handling. Once OSPE responds with Estimated Completion Date (ECD), CRSG follows up w/OSPE until job is completed.	Interconn Svcs.	SDWC	0.0100		
12	SERVICE INQUIRY	LCSC receives SI, validates for accuracy & processes for billing	Interconn Svcs.	230X	0.0100		
13	ENGINEERING	OSPE receives SI from CRSG, verifies load coil/equipment locations in plats. (Engineering)	Network	JG57	0.0200		
14	ENGINEERING	OSPE codes, assigns job number and returns SI to CRSG. (Clerical)	Network	WS10	0.0200		
15	ENGINEERING	AFIG receives job from OSPE and posts records	Network	4M1X	0.0200		
16		<b>Underground Application (90%) - Load Coil/Equipment Removal</b>					
17	CONNECT & TURN-UP TEST	OSP Construction sets up manholes (2 hrs ea.); opens/closes splices (1 hr.); deloads pairs (1 1/2 hr.) (Assumes 2.1 load coils removed.)	OSPC	420X	0.0416		
18		<b>Buried/Aerial (10%) - Load Coil/Equipment Removal</b>					
19	CONNECT & TURN-UP TEST	OSP Construction set-up (1 hr); opens/closes splices (1hr.); deloads pairs (1 1/2 hr.) (Assumes 2.1 load coils removed.)	OSPC	420X	0.0388		
20	TRAVEL	OSP Construction travels to load coil/equipment sites	OSPC	420X	0.0100		
21							
22							
23	<b>ASSUMPTIONS:</b>						
24	1) Loops less than 18Kft. contain an average of 2.1 load coils/equipment.						
25	2) Connect & Turn-Up Test worktimes are to modify ten pair.						
26							

	A	B	C	D	E	F	G
27	NONRECURRING COST STUDY INPUT - VERSION 2.0					ASSUMES MANUAL SERVICE INQUIRY PROCESS	
28	UNBUNDLED LOOP MODIFICATION	LOAD COIL/EQUIPMENT REMOVAL PER PAIR (designed circuit) - LOOPS GREATER THAN 18KFT.					
29	Study Period: 2000-2002						
30	DISCONNECT LOCATION LIFE (MOS.):	N/A					
31	STATE:	FL					
32	COST ELEMENT #:	A.17.2			WORKTIMES SHOWN ARE IN HOURS		
33							
34	<u>DESCRIPTION</u>	<u>WORK CENTERS / WORK ACTIVITIES</u>	<u>SME</u>	<u>JFC</u>	<u>FIRST INSTALL</u>	<u>FIRST DISCONNECT</u>	<u>ADDTL INSTALL</u>
		CRSG/Act Team receives Service Inquiry (SI) from CLEC; forwards to OSPE for handling. Once OSPE responds with Estimated Completion Date (ECD), CRSG follows up w/OSPE until job is completed. Upon completion of job, CRSG notifies CLEC that loop is conditioned and sends SI to LCSC for processing.					
35	SERVICE INQUIRY	LCSC receives SI, validates for accuracy & processes for billing	Interconn Svcs	SDWC	0.0100		
36	SERVICE INQUIRY	OSPE receives SI from CRSG, researches load coil/equipment locations in plats. (Engineering)	Interconn Svcs	230X	0.0100		
37	ENGINEERING	OSPE codes, assigns job number and returns SI to CRSG (Clerical)	Network	JG57	0.0200		
38	ENGINEERING	AFIG receives job from OSPE and posts records.	Network	WS10	0.0200		
39	ENGINEERING		Network	4M1X	0.0100		
40		<b>Underground Application (90%) - Load Coil/Equipment Removal</b>					
41	CONNECT & TURN-UP TEST	OSP Construction sets up manholes (2 hrs.); opens/closes splice (1 hr.); deloads one pair (9 min.)	OSPC	420X	0.0693		
42		<b>Buried/Aerial (10%) - Load Coil/Equipment Removal</b>					
43	CONNECT & TURN-UP TEST	OSP Construction set-up (1 hr); opens/closes splice (1 hr.); deloads one pair (9 min.)	OSPC	420X	0.0323		
44	TRAVEL	OSP Construction travels to load coil/equipment sites.	OSPC	420X	0.0100		
45							
46							
47	<u>ASSUMPTIONS:</u>						
48	1) Loops greater than 18Kft. Contain an average of 3.5 load coils/equipment.						
49							

A	B	C	D	E	F	G	
50	NONRECURRING COST STUDY INPUT - VERSION 2.0				ASSUMES MANUAL SERVICE INQUIRY PROCESS		
51	UNBUNDLED LOOP MODIFICATION	BRIDGED TAP REMOVAL PER PAIR (designed circuit)					
52	DISCONNECT LOCATION LIFE (MOS.):	N/A					
53							
54	STATE:	FL					
55	COST ELEMENT #:	A.17.3					
56		WORKTIMES SHOWN ARE IN HOURS					
57	DESCRIPTION	WORK CENTERS / WORK ACTIVITIES	SME	JFC	INITIAL VISIT	REVISIT	TOTAL WORK TIMES
58	SERVICE INQUIRY	CRSG/Acct Team receives Service Inquiry (SI) from CLEC, forwards to OSPE for handling. Once OSPE responds with Estimated Completion Date (ECD), CRSG follows up w/OSPE until job is completed. Upon completion of job, CRSG notifies CLEC that loop is conditioned and sends SI to LCSC for processing.	Interconn Svcs.	SDWC	0.0250	0.0000	0.0250
59	SERVICE INQUIRY	LCSC receives SI, validates for accuracy and processes order. OSPE receives SI from CRSG, verifies bridged tap locations in plats. (Engineering)	Interconn Svcs.	230X	0.0250	0.0000	0.0250
60	ENGINEERING	OSPE codes, assigns job number and returns SI to CRSG (Clerical)	Network	JG57	0.0200	0.0000	0.0200
61	ENGINEERING	AFIG receives job from OSPE and posts records.	Network	WS10	0.0100	0.0000	0.0100
62	ENGINEERING		Network	4M1X	0.0100	0.0000	0.0100
63		<b>INITIAL BT REMOVAL</b>					
64		<b>Underground Application - Bridged Tap Removal (1 Bridged Tap)</b>					
65	CONNECT & TURN-UP TEST	OSP Construction removes bridged tap. (Setup-2 hrs; open/close splice-1 hr.; remove bridged tap-.75 hr.)	OSPC	420X	0.0500		0.0500
66		<b>Buried/Aerial - Bridged Tap Removal (2 Bridged Taps)</b>					
67	CONNECT & TURN-UP TEST	OSP Construction removes bridged taps (2). (Setup-1 hr; open/close splice-1 hr.; remove bridged tap-.75 hr.)	OSPC	420X	0.0380		0.0380
68		<b>20% ADDITIONAL BT REMOVAL</b>					
69		<b>Underground Application - Bridged Tap Removal (.67 Bridged Tap)</b>					
70	CONNECT & TURN-UP TEST	OSP Construction removes bridged tap. (Setup-2 hrs; open/close splice-1 hr.; remove bridged tap-.75 hr.)	OSPC	420X		0.0000	0.0000
71		<b>Buried/Aerial - Bridged Tap Removal (1.33 Bridged Taps)</b>					
72	CONNECT & TURN-UP TEST	OSP Construction removes bridged taps (2). (Setup-1 hr; open/close splice-1 hr.; remove bridged tap-.75 hr.)	OSPC	420X		0.0000	0.0000
73	TRAVEL	OSP Construction travels to bridged tap sites.	OSPC	420X	0.0100	0.0000	0.0100
74							
75	ASSUMPTIONS:						
76	1) 3 bridged taps will be removed initially; removal of 2 additional bridged taps may be necessary (20%)						
77	2) OSP Construction spends 45 minutes to remove each bridged tap.						
78	3) One-third of all bridged taps are underground; two-thirds are either buried or aerial.						
79	4) Worktimes are divided by ten, assuming times are for bridged tap removal on ten pairs.						



A	B	C	D	E	F	G	
1	NONRECURRING COST STUDY INPUT - VERSION 2.0						
2	UNBUNDLED LOOP MODIFICATION-RECOVERY						
3	Study Period: 2000-2002						
4	DISCONNECT LOCATION LIFE (MOS.):	N/A					
5							
6	STATE:	FL					
7	COST ELEMENT #:	A.17.4					
8							
9							
10	DESCRIPTION of A.17.1	WORK CENTERS / WORK ACTIVITIES	SME	JFC	FIRST INSTALL	FIRST DISCONNECT	ADDTL INSTALL
		CRSG/ACCT Team receives Service Inquiry (SI) from CLEC; forwards to OSPE for handling. Once OSPE responds with Estimated Completion Date (ECD), CRSG follows up w/OSPE until job is completed.	Interconn Svcs.	SDWC	0.0100		
11	SERVICE INQUIRY						
		LCSC receives SI, validates for accuracy & processes for billing	Interconn Svcs.	230X	0.0100		
12	SERVICE INQUIRY						
		OSPE receives SI from CRSG, verifies load coil/equipment locations in plats. (Engineering) OSPE codes, assigns job number and returns SI to CRSG. (Clerical)	Network	JG57	0.0200		
13	ENGINEERING						
		AFIG receives job from OSPE and posts record. Underground Application (90%) - Load Coil/Equipment Removal	Network	WS10	0.0200		
14	ENGINEERING						
		OSP Construction sets up manholes (2 hrs ea.); opens/closes splices (1 hr.); deloads pairs (1 1/2 hr.) (Assumes 2.1 load coils removed.) Buried/Aerial (10%) - Load Coil/Equipment Removal	OSPC	420X	0.0416		
15	ENGINEERING						
		OSP Construction set-up (1 hr); opens/closes splices (1hr.); deloads pairs (1 1/2 hr.) (Assumes 2.1 load coils removed.)	OSPC	420X	0.0388		
16							
17	CONNECT & TURN-UP TEST						
		OSP Construction travels to load coil/equipment sites	OSPC	420X	0.0100		
18							
19	CONNECT & TURN-UP TEST						
20	TRAVEL						
21							
22	DEMAND FOR CONDITIONING	Source	2000	2001	2002		
23							
24	FL - Incoming xDSL Capable Loops-2000	Interconnection	9,018	4,743	3,552		
25							
		Cumulative Incoming Loops==>	=SUM(C24:E24)				
26			17,313				
27	FL - Incoming Loops Requiring Conditioning	Interconnection	3,949	1,978	1,481		
28							
		Cumulative Incoming Conditioned Loops==>	=SUM(C27:E27)				
29			7,408				
30	# Loops Conditioned Not Recovered Elsewhere	See Assumption 1	4				
31							
32	WorkTimes for One Conditioning:						
33	SERVICE INQUIRY	=+E11	0.0100				
34	SERVICE INQUIRY	=+E12	0.0100				
35	ENGINEERING	=+E13	0.0200				
36	ENGINEERING	=+E14	0.0200				
37	ENGINEERING	=+E15	0.0200				
38	CONNECT & TURN-UP TEST	=+E17	0.0416				
39	CONNECT & TURN-UP TEST	=+E19	0.0388				
40	TRAVEL	=+E20	0.0100				
41							
42	Amount To Be Recovered from xDSL Loops:						
43	SERVICE INQUIRY	=(C33*\$C\$30*\$C\$28)/\$C\$25	0.0171				
44	SERVICE INQUIRY	=(C34*\$C\$30*\$C\$28)/\$C\$25	0.0171				
45	ENGINEERING	=(C35*\$C\$30*\$C\$28)/\$C\$25	0.0342				
46	ENGINEERING	=(C36*\$C\$30*\$C\$28)/\$C\$25	0.0342				
47	ENGINEERING	=(C37*\$C\$30*\$C\$28)/\$C\$25	0.0342				
48	CONNECT & TURN-UP TEST	=(C38*\$C\$30*\$C\$28)/\$C\$25	0.0712				
49	CONNECT & TURN-UP TEST	=(C39*\$C\$30*\$C\$28)/\$C\$25	0.0664				
50	TRAVEL	=(C40*\$C\$30*\$C\$28)/\$C\$25	0.0171				
51							
52							
53							
54	Assumptions:						
55	1) Of the 10 lines being conditioned on a field visit; 2 will be recovered through UNE applications, 4 from BST; and 4 leftover						
56	2) Demand of xDSL capable loops includes ADSL, HDSL, and UCL						

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via first class mail on the following parties on this 12<sup>th</sup> day of September, 2000.

\*Beth Keating  
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Sprint-Florida, Incorporated  
Charles J. Rehwinkel  
1313 Blairstone Road  
Tallahassee, FL 32301-3021

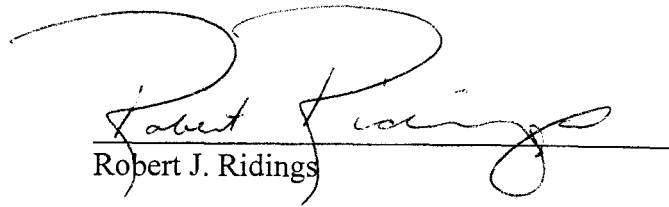
Supra Telecommunications and Information  
Systems, Inc.  
Mark E. Buechele  
Koger Center - Ellis Bldg.  
1311 Executive Center Dr., Suite 200  
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\* **Via Overnight Delivery**