500 DN 0121903 MJ 2.5.03 BEFORE THE PUBLIC SERVICE COMMIS

In re: Investigation into Pricing of **Unbundled Network Elements**

990649B-TP

REBUTTAL TESTIMONY OF

WARREN R. FISCHER

QSI CONSULTING, INC.

(Addressing Geographic Deaveraging, Annual Cost Factors and **Common Costs**)

On behalf of

AT&T Communications of the Southern States, Inc. MCImetro Access Transmission Services, LLC & MCI WorldCom Communications, Inc. Florida Digital Network, Inc. (collectively called the "ALEC Coalition")

January 30, 2002

CONTAINS PROPRIETARY EXHIBITS

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PUBLIC VERSION

EXHIBIT LIST

EXHIBIT WRF - 1: BACKGROUND OF WARREN R. FISCHER

PROPRIETARY EXHIBIT WRF -2: 2-WIRE LOOP DEAVERAGING USING SPRINT

METHODOLOGY AND ±20% DEVIATION

STANDARD

PROPRIETARY EXHIBIT WRF - 3: 2-WIRE LOOP DEAVERAGING USING SPRINT

METHODOLOGY CONDENSED TO THREE

RATE ZONES

PROPRIETARY EXHIBIT WRF - 4: DS-1 LOOP DEAVERAGING USING SPRINT

METHODOLOGY AND ±20% DEVIATION

STANDARD

PROPRIETARY EXHIBIT WRF - 5: DS-1 LOOP DEAVERAGING USING SPRINT

METHODOLOGY CONDENSED TO THREE

RATE ZONES

EXHIBIT WRF-6: EXCERPT FROM BELL ATLANTIC'S FORM S-

4 FILED WITH THE SECURITIES AND EXCHANGE COMMISSION TO ISSUE SHARES IN CONJUNCTION WITH THE

PROPOSED MERGER WITH GTE

I. INTRODUCTION

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- 3 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- A. My name is Warren R. Fischer. My business address is 3333 East Bayaud

 Avenue, Suite 820, Denver, Colorado 80209.

6 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Quantitative Solutions, Inc. ("QSI") as a Senior Consultant.

As such, I am responsible for providing expert testimony and analytical support on a number of subject matters involving implementation of the procompetitive provisions of the Telecommunications Act of 1996 ("the Act").

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

12 A. I have a Bachelor of Science degree in Business Administration with a
13 concentration in Accounting from the University of Colorado in Boulder,
14 Colorado. I am licensed as a Certified Public Accountant in Colorado and
15 California.

Q. WHAT IS YOUR EMPLOYMENT BACKGROUND?

A. After graduating from the University of Colorado, I worked for several years as an accountant with Deloitte & Touche conducting financial audits.

Thereafter, I worked for two other major corporations as a financial analyst. I then joined AT&T Wireless Services in 1995 as a financial analyst where I

managed the preparation of annual revenue forecasts for the cellular division. 1 2 In 1996, I transferred to AT&T Corporation where I became a financial 3 manager and a subject matter expert on pricing and costing issues involving local exchange and exchange access services. In 2000, I joined QSI as a 4 5 Senior Consultant.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS OR OTHER PUBLIC **UTILITY COMMISSIONS?**

8 Α. Yes. I have filed testimony at the FCC and in several state regulatory 9 proceedings on subjects such as alternative local exchange carrier ("ALEC") 10 cost issues, revenue requirements, interconnection costs, access rate 11 reform, Universal Service Fund reform, and Section 272 provisions of the 12 Act. I have attached **Exhibit WRF - 1** for a more detailed explanation of my 13 education, experience and previous testimony.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

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A. I am testifying on behalf of AT&T Communications of the Southern States. Inc., MCImetro Access Transmission Services, LLC & MCI WorldCom Technologies, Inc. and Florida Digital Network ("ALEC Coalition").

B. Purpose and Scope of Testimony

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

20 Α. The purpose of my testimony is to address the following issues from Appendix A in the Florida Public Service Commission's (Commission) Order

1		Establishing Proce	dure for this	Phase III, Order No. PSC-01-1592-PCO-TP
2		issued August 2, 2	001, as the	y pertain to Verizon Florida, Inc. ("Verizon –
3		FL"):		
4		Issue 2 (a):	What is t	he appropriate methodology to deaverage
5			unbundled	I network elements ("UNEs") and what is the
6			appropriat	e rate structure for deaveraged UNEs?
7		•		
8		Issue 7:	What are	the appropriate assumptions and inputs for
9			the followi	ng items to be used in the forward-looking
10			recurring (JNE cost studies?
11			(b): dep	preciation;
12			(c): cos	t of capital;
13			(t): exp	enses; and
14			(u): con	nmon costs.
15 16		The other relevant	assumption	s inputs under Issue 7 are addressed by the
17		rebuttal testimony	of ALEC Co	alition witness, Dr. August Ankum.
18		C. Summary o	f Recomme	endations
19	Q.	PLEASE SUMMAR	RIZE YOUR	RECOMMENDATIONS.
20	A.	I recommend that t	he Commis	sion do the following:
21		1. Require Ver	zon – FL to	geographically deaverage its UNE loop rates
22		at the wire c	enter level u	sing a defined measure of cost variation that

results in the creation of zones based on cost differences, not protectionist policies, and which will promote competition. I believe applying the Sprint rate banding methodology to Verizon's unbundled loop costs will allow the Commission to objectively determine the required number of deaveraged rate zones. Further, the Commission must review the end results of any deaveraging methodology, just as it must review the rates themselves, to ensure that competition is not impeded by the rate structure.

- 2. Reject Verizon FL's use of a 12.95% cost of capital and financial reporting lives for depreciation. Instead, the Commission should require Verizon FL to re-run its cost studies with the cost of capital and depreciation lives recommended by Dr. Ankum.
- 3. Reject Verizon FL's use of C. A. Turner indices to inflate investment and its use of Integrated Cost Model ("ICM") investment in expense-to-investment calculations.
- 4. For common cost recovery, the Commission should (1) require Verizon to properly account for its realized and expected merger savings and to determine a common cost factor that is consistent with Verizon being one of the largest ILECs in the country (2) use the common cost factor based upon total regulated revenue with consideration given to a smaller allocation of common costs to UNE loops, (3) require Verizon FL to apply the common cost factor to deaveraged rates as a percentage, and (4) require Verizon FL to

1		remove lobbying, legal, and regulatory costs from its common cost
2		factor that are adverse to ALEC interests.
3	II.	ISSUE 2 (a): WHAT IS THE APPROPRIATE
4		METHODOLOGY TO DEAVERAGE UNES AND WHAT IS
5		THE APPROPRIATE RATE STRUCTURE FOR
6		DEAVERAGED UNES?
7		A. Deaveraging Recommendations
8	Q.	WHAT ARE YOUR OVERALL RECOMMENDATIONS REGARDING
9		GEOGRAPHIC DEAVERAGING FOR UNES IN THIS PROCEEDING?
10	A.	At a minimum, the Commission should require geographic deaveraging of
11		UNE loop rates similar to what it adopted in the BellSouth phase of this
12		
		proceeding (Docket No. 990649-TP, Order No. PSC-01-1181-FOF-TP,
13		issued May 25, 2001, pages 40-41. May 25, 2001 UNE Order). This is
14		essential because the loop is the primary bottleneck facility required by
15		ALECs for competitive entry, and it is subject to significant cost differences
16		based on customer density and distance. In implementing this policy, I
17		recommend that the Commission:
18		Reject the statewide average rate proposal and fears of rate arbitrage
19		promulgated by Verizon – FL witness, Dennis Trimble.
20		Adopt the geographic deaveraging methodology described in Sprint –

Florida, Inc. ("Sprint") witness Michael Hunsucker's direct testimony for use with Verizon - FL. The Sprint methodology applies an objective, measurable standard of cost variation to determining the required number of rate zones. This methodology limits the extent to which costs for a loop provisioned within a given wire center can exceed (or fall below) the average cost of the rate group within which the wire center is placed. In short, the Sprint methodology ensures that no wire center-level loop cost will exceed (or fall short of) the average loop rate within a rate group by more than 20%.

 Adopt a deaveraging methodology that does not restrict competitive activity.

Q. WHY SHOULD THE COMMISSION REJECT VERIZON - FL'S PROPOSED STATEWIDE AVERAGE UNE RATE PROPOSAL?

A. Verizon - FL's proposal to price UNEs at a statewide average rate is rooted in its desire to have retail rate deaveraging implemented before UNE deaveraging is implemented (see Direct Testimony of Dennis Trimble, page 9). In fact, Verizon — FL's claim that the Commission is under no obligation to deaverage Verizon — FL's UNE rates at this time is totally without merit (Trimble Direct, pages 17-18). The Commission has already acknowledged that it is required to deaverage UNE rates in at least three geographic areas according to 47 C.F.R. §51.507(f) of the FCC's rules on general rate design requirements for the pricing of interconnection and UNEs (See *May 25, 2001 UNE Order*, page 32-33). Therefore, Verizon — FL's request should be

rejected out of hand.

Α.

2 B. Applying Sprint Deaveraging Methodology

Q. WHY DO YOU ADVOCATE THAT THE COMMISSION USE SPRINT'S RATE BAND METHODOLOGY FOR UNE RATE DEAVERAGING?

As the Commission has previously noted in the BellSouth phase of this proceeding, the Sprint rate banding methodology is an objective cost-based methodology that does not rely upon existing retail rate zones. In addition to complying with the FCC's deaveraging requirements of 47 C.F.R. §51.507, the Sprint rate-banding methodology gives the Commission the flexibility to adjust the number of zones created based upon the percentage of deviation it sets as a benchmark to compare individual wire center costs to. The ALEC Coalition believes that the Sprint proposal should be applied to Verizon – FL rates and that the methodology as applied must not restrict competitive activity.

Q. WHAT CRITERIA DID SPRINT EMPLOY TO CREATE PRICE ZONES FOR ITS UNES?

A. Sprint calculated the monthly recurring cost for each UNE it proposes to deaverage at the wire center level and then grouped these deaveraged costs into rate bands (price zones) of similar costs. The lower and upper boundary of each rate band was set at –20% and +20% ("± 20%"), respectively, of the average cost of the units in that proposed rate band. If a wire center exceeded these boundaries, it was redistributed into the appropriate rate

band. The benefit of this process is that it allows cost-zones to be created
solely upon underlying costs characteristics, and not due to some artificia
grouping of wire centers.

Α.

Q. HAVE YOU APPLIED THE SPRINT RATE BANDING METHODOLOGY TO VERIZON – FL'S UNE COSTS?

I have applied Sprint's methodology to Verizon – FL's 2-wire and DS1 loop costs, before any input adjustments are made to lower UNE costs through Verizon – FL's ICM, to demonstrate the impact of applying this methodology to the deaveraged UNE prices proposed by Verizon – FL. The UNE rate bands were created using Sprint's recommended 20% range of deviation resulting in eight rate bands or zones for a 2-wire loop and four zones for a DS1 loop. The results for each are reflected in the following exhibits.

Proprietary Exhibit WRF – 2 contains the detailed output from the Sprint deaveraging model for the 2-wire loop and proprietary Exhibit WRF – 4 contains the detailed output for the DS1 loop.

Q. HAS THIS COMMISSION PREVIOUSLY MADE A DETERMINATION ON THE NUMBER OF RATE ZONES THAT ARE APPROPRIATE?

A. The Commission did make a determination that three rate zones were the most reasonable choice for BellSouth in the *May 25, 2001 UNE Order*. It made this determination based upon the belief that too many zones would be administratively burdensome and would not be necessary to reflect the level of variation in BellSouth's costs. Consistent with this determination, I have

1		included alternative rate band calculations that collapse the zones calculated
2		in proprietary Exhibits WRF-2 and WRF-4 to three for both 2-wire and DS-1
3		loops. These three-zone calculations are contained in proprietary Exhibits
4		WRF-3 and WRF-5.
5	Q.	DO YOU BELIEVE THAT THE COMMISSION SHOULD APPROVE MORE
6		THAN THREE ZONES FOR VERIZON – FL?

A. Yes, I do if cost differences warrant it. In creating 47 C.F.R. §51.507(f), the FCC noted the following:

... A state may establish more than three zones where cost differences in geographic regions are such that if finds that additional zones are needed to adequately reflect the costs of interconnection and access to unbundled elements. (*Local Competition Order*, FCC 96-325, ¶765)

9.

Clearly, the FCC's overriding concern is that the number of rate zones adequately reflect the differences in provisioning UNEs. The administrative cost to implement more than three rate zones should be minimal since the work required is mostly one-time charges to make programming changes in the ILEC's underlying rate tables within its billing system. Therefore, I do not believe the administrative costs to implement more than three rate zones would be burdensome in this instance.

The other issue the Commission referred to in its preference for three rate

zones was whether more zones are required to reflect the level of variation in BellSouth's costs. If one applies this same evaluation criterion to Verizon – FL's 2-wire loop cost by zone in Exhibit DBT-3 to Mr. Trimble's direct testimony, it is readily apparent that more than three rate zones are required.

Q. PLEASE EXPLAIN WHY MORE THAN THREE ZONES ARE REQUIRED FOR VERIZON-FL'S 2-WIRE UNE LOOP.

A. Page 1 of Exhibit DBT-3 illustrates the results of Verizon – FL's three-zone deaveraging proposal for a 2-wire loop. Zone 1 is based upon an average price of \$18.94 with the statewide average rate of \$22.94 as the ceiling. Consequently, approximately 67% of Verizon – FL's lines are priced below the statewide average rate. Zone 2 uses the statewide average rate of \$22.94 as the floor and a rate 200% above the statewide average as the ceiling. Zone 3 contains wire centers with costs in excess of 200% of the statewide average. A 200% cost variation standard results in UNE rates that are overly averaged.

Q. WHAT ARE THE RESULTS OF APPLYING THE SPRINT RATE BANDING METHODOLOGY TO VERIZON'S WIRE CENTER COSTS?

A. The Sprint methodology as applied to Verizon's wire center costs is illustrated in **proprietary WRF-Exhibit – 2**. Approximately 82% of total lines would be priced below the statewide average cost of \$22.94 before common costs are applied, but these lines would be segregated into three zones compared to Verizon's Zone 1. My proposed Zones 1 (\$8.93) and 2 (\$16.44)

would price approximately 22% of Verizon's lines below its Zone 1 rate of \$18.94. The remaining 59% of lines priced below the statewide average rate of \$22.94 would be placed in Zone 3 at a price of \$21.42. Even using the three-zone version of 2-wire loop deaveraging in **proprietary Exhibit WRF-3**, the results are similar in that 82% of total lines are below the \$22.94 statewide average cost and are segregated into two zones rather than the one zone Verizon – FL proposes. While the Commission may not want to implement eight rate zones for policy reasons, certainly the range of cost differences between wire centers calls for more than three rate zones.

C. Rationale For Extensive Deaveraging

A.

- Q. IS THERE A "RULE-OF-THUMB" THAT THE COMMISSION SHOULD USE
 WHEN DECIDING WHEN AND HOW TO ESTABLISH DEAVERAGED
 RATES?
 - Yes. The Commission should keep in mind that economic efficiency will be best served when the rates charged for gaining access to a particular UNE most closely match the costs associated with making the particular UNE available. The more the underlying costs supporting a given rate are averaged across a larger geographic area or across individual facilities (i.e., loops in different geographic locations) with disparate underlying costs, the more likely the cost differences between individual facilities (and the UNEs they support) will be "hidden." In other words, the cost differences will not be evident within the rate, and proper market incentives will be distorted. As a general rule, the Commission should favor more extensive geographic

deaveraging rather than less geographic deaveraging. A greater degree of geographic deaveraging will enhance economic efficiency and the development of competition.

Q. IS ECONOMIC EFFICIENCY BETTER SERVED WITH GREATER DEAVERAGING?

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Yes, it will. Society's resources are more efficiently allocated when prices are set to recover only the underlying incremental costs incurred in providing the service. Prices set in this fashion provide information and incentives to buyers and sellers that allow them to make proper "build versus buy" and other decisions concerning consumption and production. Where prices are set to recover costs associated with providing an unbundled element and facilities already exist that can be used to provide service to a customer, a facilities buyer can make a reasonable determination whether it would be more efficient (i.e. cheaper) to buy that network element for use in serving the customer or to build a facility to serve that customer. In this way, the ALEC is provided the information necessary to make a rational decision as to whether it should build or buy the network element. As a result of making a decision in its own best economic interest, the ALEC is also making a decision in society's best interest (i.e., the ALEC is foregoing the deployment of societal resources that would be unnecessarily deployed given the availability of Verizon - FL's existing facility).

Q. WOULD HIGH-COST CUSTOMERS BEING SUBSIDIZED BY LOW-COST CUSTOMERS RESULT IN LESS COMPETITION AS A WHOLE?

There are substantial fixed costs associated with beginning a Yes. competitive telecommunications enterprise. In addition, competitors have limited resources available, after incurring these substantial upfront costs, to be used to attract customers. Carriers can only hope to compete with an incumbent in the long term by generating economies of scale and scope that bring its average, per-unit-cost of providing service down to a level comparable with the incumbent's (which already realizes economies of scale and scope associated with serving almost 100% of the customers in its particular service territory). Hence, when rates for essential network elements in low-cost areas are priced higher than they should be because of overly averaged rates, the customers which competitors are most likely to attract initially for purposes of gaining economies of scale and scope (because they can be served with the least amount of additional marginal outlay) are sheltered from competition by the fact that the costs of serving those customers are higher than they should be. As such, in areas with overly averaged rates, it is more difficult for ALECs to establish a "foothold" that can be used to gain the economies of scale and scope necessary to extend their competitive services.

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Q. ARE THERE OTHER PROBLEMS THAT OCCUR WHEN RATES FOR UNBUNDLED NETWORK ELEMENTS ARE SET AT AN OVERLY AVERAGED LEVEL?

A. Yes. Competitors will be charged rates for UNEs and UNE combinations that are largely unrelated to the costs incurred by the ILEC to provide them.

Therefore, competitors may find themselves in a position in which incumbents have the ability to significantly undercut them. Verizon - FL, for example, could reduce its retail prices in high-density, low-cost areas to levels that are less than the average rates that competitors pay for UNEs required to provide their competing services. Verizon - FL, in such an instance, may not necessarily be charging prices below its own costs, but Verizon - FL would be charging retail prices below the overly averaged rate levels its competitors must pay to compete. This is exactly the situation that Congress was attempting to avoid when it established that rates for access to UNEs must be set in a nondiscriminatory and cost-based fashion (see Section 251(c)(3) of the Telecommunications Act of 1996 ("the Act")).

A deaveraging methodology that results in a minimal number of wire centers and access lines in zones where the lowest rates are available does not promote competition. **Proprietary exhibit WRF-3** illustrates the Sprint methodology applied to Verizon – FL's UNE costs before they are modified for input changes, and it assumes just three rate zones are used. (The ALEC Coalition recommends more than three zones). In this example, there would be 15 Zone 1 wire centers, serving 22% of Verizon's access lines. Depending on the level of the rates, such a distribution may not be sufficient to promote competition to a desirable level. Therefore, it is important that the Commission make a second-tier end-result evaluation for any methodology it approves to ensure that the competitive goals of the Act will be carried out and that the methodology adopted does not have arbitrary results.

1	m.	ISSUE 7: WHAT ARE THE APPROPRIATE ASSUMPTIONS
2		AND INPUTS FOR THE FOLLOWING ITEMS TO BE USED IN
3		THE FORWARD-LOOKING RECURRING UNE COST
4		STUDIES?
5		A. (b): Depreciation and (c): Cost of Capital
6	Q.	DO YOU ADDRESS VERIZON'S PROPOSED DEPRECIATION LIVES AND
7		COST OF CAPITAL IN DETAIL WITHIN YOUR TESTIMONY?
8	A.	No, I do not. Dr. Ankum discusses the flaws in Verizon - FL's proposed
9		depreciation rates and cost of capital. I rely upon Dr. Ankum's
10		recommendations to perform sensitivity analyses within Verizon – FL's ICM
11		model.
12	Q.	WHAT IS YOUR OVERALL ASSESSMENT OF VERIZON-FL'S
13		PROPOSED CAPITAL COST FACTORS?
14	A.	I believe that Verizon - FL's capital cost factors are overstated for the
15		following reasons:
16		 Verizon – FL uses a weighted average cost of capital of 12.95% (see
17		Direct Testimony of Dr. James H. Vander Weide, page 4), which
18		exceeds the ceiling of 10.24% recommended by ALEC Coalition
19		witness Dr. August Ankum in this proceeding (see Rebuttal Testimony
20		of Dr. August Ankum)

Verizon – FL uses the accelerated depreciation lives employed in its
financial reporting to shareholders as opposed to Dr. Ankum's
recommendation that the FCC prescribed lives or the lives approved
by this Commission in the BellSouth phase of this proceeding (see
Direct Testimony of Allen E. Sovereign, pages 2-9) be used (see
Rebuttal Testimony of Dr. August Ankum).

If the Commission were to implement Dr. Ankum's recommendations, the UNE recurring costs would be reduced significantly. For example, the 2-wire UNE loop rate would decline approximately \$4 per month from a statewide average rate of \$22.94 to \$18.98, a 17% decline. Therefore, the Commission should require Verizon – FL to rerun its ICM and external cost models with the inputs recommended by Dr. Ankum.

B. (t): Recurring Expenses Derived Through Maintenance and Support Factors

Q. WHAT ARE VERIZON – FL'S MAINTENANCE AND SUPPORT FACTORS USED FOR?

A. Verizon – FL calculates a series of maintenance and support factors to apply against the investment modeled within its ICM which then produces the annual costs required to support that investment. These annual costs are then divided by twelve to produce monthly recurring maintenance and support costs for each UNE.

1 Q. HOW ARE MAINTENANCE AND SUPPORT FACTORS TYPICALLY 2 CALCULATED?

- A. Maintenance and support factors are a typically calculated by dividing expenses incurred in maintaining and supporting the network and related operations by the investment in the network and related operations that generates those expenses.

 The resulting ratio represents the relationship between expenses and investment that can be applied against future investment to estimate future expenses required to support that investment.
- Q, HAS VERIZON OVERSTATED THE MAINTENANCE AND SUPPORT FACTORS USED IN DETERMINING RECURRING UNE COSTS IN THIS PROCEEDING?
 - A. Yes, it has. An expense factor is nothing more than a fraction, and a fraction can be overstated if the numerator is greater than it should be and/or if the denominator is less than it should be. Verizon-FL has overstated the fractions used to estimate annual recurring TELRIC expenses in at least three important ways.

First, it overstates the operating expenses used to calculate the numerator by not using a bottoms-up approach to calculate the forward-looking expense required to operate and support a network built from scratch. Instead, Verizon – FL relies upon a tops-down methodology which starts with book expenses and then incorporates a series of adjustments for accounting—based normalization entries, removal of certain non-forward looking costs such as analog switching, retail

avoided costs and costs recovered through other studies such as NRCs, Billing and Collection, etc. as outlined in its ICM Expense Module Methodology.

A.

Second, it overstates the investment values used to calculate the capital carrying costs of support assets. These inflated capital carrying costs are then combined with other operating expenses to form the numerator portion of the expense-to-investment ratio described above.

Third, Verizon – FL inappropriately reduces the denominator, investment, of the above factor by replacing the investment used to generate the existing level of expenses with modeled investment out if its ICM.

- Q. PLEASE EXPLAIN FURTHER WHY VERIZON FL HAS NOT MADE

 OPERATING EXPENSES IN THE NUMERATOR OF ITS EXPENSE-TOINVESTMENT RATIOS FORWARD-LOOKING.
 - The proper way to derive forward-looking expenses would be through a bottomsup determination of the expenses needed to operate and support a forwardlooking network. This would take into account the configuration and quantity of
 assets needed in the network and the appropriate level of staffing and support
 assets required to operate that network. It would also exclude those costs that
 should not be part of a wholesale UNE recurring cost study. As noted previously,
 the only adjustments Verizon FL has made to its expenses are for accounting—
 based normalization entries, removal of certain non-forward looking costs such
 as analog switching, retail avoided costs and costs recovered through other cost
 studies.

l	Q.	PLEASE	EXPLAIN	IN	FURTHER	DETAIL	HOW	VERIZON	-	FL
2		OVERSTA	TES THE <u>C</u>	OST	S OF SUPPO	ORT ASSE	<u>TS</u> AND	THE NUME	RAT	OR
3		PORTION	OF ITS FX	PFN	SF-TO-INVE	STMENT	RATIOS	.		

A. Verizon – FL applies C. A. Turner Plant Indices to its book investment to bring it up to replacement cost (see Attachments J.1 – J.4 in the ICM Expense supporting documentation). The indices are simply tools to identify the relative change in price over a period of time. They do not identify whether the same quantity or type of investment would be required in a forward-looking construct. Therefore, application of a price index alone is insufficient to make investment forward-looking.

Verizon – FL applies the C. A. Turner indices to support investment contained in USOA accounts 2111 through 2124 (see Attachment K in Verizon – FL's ICM Expense supporting documentation). The net effect of this process is to increase support investment from \$472,473,000 to \$610,896,842, which is a 29% increase. Verizon – FL then applies its annual cost factors for (1) depreciation and cost of capital, (2) income taxes and (3) property taxes to calculate annual general support expenses.

These annual general support expenses then flow to the schedule where maintenance, support and common costs are compiled (see Attachment O in the ICM Expense supporting documentation). Based on Verizon – FL's allocation of support and direct expenses to its various direct cost pools and common costs, 63% of the overstatement caused by the C. A. Turner indices ends up in the numerator of the maintenance and support factor calculation. The remaining

37% of this overstatement ends up in the common cost expense amount used in the common cost factor calculation. Therefore, the Commission should reject Verizon – FL's use of the C. A. Turner indices because this methodology does not consider what physical quantity or type of support asset is necessary in a forward-looking construct. Instead, the C.A. Turner indices only serve to inflate the current embedded base of assets to today's prices. Consequently, the Commission should require Verizon – FL to recalculate its annual support costs using a forward-looking investment base to calculate forward-looking support costs and using appropriate capital cost factors for depreciation and cost of capital as recommended by Dr. Ankum. Clearly, the forward-looking investment base should be less than its current book investment.

A.

Q. PLEASE EXPLAIN FURTHER HOW VERIZON – FL INAPPROPRIATELY REDUCES THE INVESTMENT USED IN THE DENOMINATOR PORTION OF THE EXPENSE-TO-INVESTMENT RATIO.

Verizon – FL inappropriately reduces the denominator portion of the expense-to investment ratio calculation by substituting the investment calculated within its cost model ("ICM Investment") for the level of investment that produced the expense used in the numerator portion of the ratio. This is accomplished through a process Verizon – FL calls calibration. Verizon – FL describes this process in the ICM Expense Module Methodology and in the following response to a Staff interrogatory:

.... This calibration results in using the forward-looking ICM-FL modeled network investments when calculating the expense to

investment ratios vs. using replacement costs or historical book costs. Note that this calibration option can be selected or rejected by the user. If calibration is not selected by the user, ICM-FL uses the replacement cost of investment values to calculate the network expense to investment ratios. (see Verizon – FL response to Staff's Second Set of Interrogatories, No. 53)

An unwarranted reduction in the denominator increases the fraction, or cost factor, that is applied against the ICM Investment, which increases the annual recurring costs of each UNE. It appears that Verizon – FL anticipated calibration might be controversial by noting that the ICM user can reject this option.

Q. WHY IS THIS TYPE OF ADJUSTMENT TO THE DENOMINATOR INAPPROPRIATE?

A. The primary reason that Verizon – FL's reduction of the denominator is inappropriate is that you cannot use the output of the same model you are using to determine a factor that will then be applied against that output to calculate recurring expenses. This is circular logic at best. Consistency demands that like terms are used in the numerator and the denominator. If Verizon – FL chooses to use its calculation of forward-looking investment in the denominator, it must use a forward-looking determination of expenses in the numerator.

Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION REGARDING VERIZON – FL'S USE OF ITS CALIBRATION METHDOLOGY?

- 1 A. I recommend that the Commission reject Verizon FL's use of the calibration 2 option within its ICM for the reasons I discussed previously.
- Q. CAN YOU QUANTIFY THE IMPACT OF VERIZON FL'S CALIBRATION
 METHODOLOGY?
- A. Yes, I can. Attachment J.4 within Verizon FL's ICM Expense documentation
 details total investment in three categories:

INVESTMENT TYPE	INVESTMENT PER ATTACHMENT J.4	ICM INVESTMENT AS A PERCENTAGE
ARMIS (book) Investment	\$4,336,566,501	70%
C. A. Turner-adjusted Investment	\$4,989,392,818	61%
ICM Investment	\$3,056,380,561	100%

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The ICM investment is approximately 70% of the book investment and 61% of the C. A. Turner-adjusted investment. If the ICM investment is used in the expense-to-investment ratio as Verizon – FL's calibration methodology requires, the maintenance and support factors are <u>overstated</u> by the following percentages than if the other two investment balances were used in the denominator:

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- 1. ARMIS (book) investment:
- 43% overstatement (1/0.70 =

- 14 1.43)
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- 2. C. A. Turner-adjusted investment:
- 64% overstatement (1 / 0.61 =

- 16 1.64)
 - In the above calculations, the percentage noted in the denominator represents the impact of using ICM investment rather than book or adjusted book

1		investment. If the calibration option is turned off within ICM-FL, the statewide
2		average 2-wire loop costs declines by approximately \$1. If this change is made
3		in conjunction with the depreciation and cost of capital changes recommended
4		by Dr. Ankum, the cumulative reduction results in a statewide average 2-wire
5		loop cost of \$17.84 compared to Verizon – FL's proposed rate of \$22.94.
6		C. (u): Allocation of Common Costs
7	Q.	DO YOU HAVE ANY CONCERNS WITH VERIZON'S PROPOSED
8		RECOVERY OF COMMON COSTS?
9	A.	Yes, I have the following concerns.
10		1. The percentage of common cost recovery that Verizon - FL seeks,
11		14.09%, appears to be excessive for a company that is now part of one of
12		the largest local exchange carriers in the nation.
13		2. Verizon - FL has chosen the higher common cost factor of the two
14		versions it calculated within its cost studies while giving no consideration
15		to the FCC's suggestion that only a relatively small share of common
16		costs be allocated to critical network elements such as the local loop.
17		3. Verizon - FL does not consistently apply its common cost allocator as a

- Verizon FL does not consistently apply its common cost allocator as a percentage to deaveraged zone rates.
- Verizon FL has inflated its common cost recovery by including lobbying, legal, and regulatory costs that are adverse to the interests of the ALECs.
- Q. PLEASE EXPAND ON THE IMPACT THAT THE BELL ATLANTIC / GTE MERGER SHOULD HAVE ON COMMON COSTS.

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A firm with Verizon's size and scope should be accountable for the economies of scale and efficiencies it promised investors, regulators and customers when it promoted the benefits of the mergers between Bell Atlantic and NYNEX and then Bell Atlantic and GTE. In its Form S-4s filed with the Securities Exchange Commission prior to each merger, Bell Atlantic extolled the various capital, revenue and expense synergies that would occur after each merger was completed. For the merger with GTE, Bell Atlantic estimated that revenue, expense and capital synergies would be approximately \$4.5 billion per year while incurring transition and integration costs of only \$1.6 billion over three years. On the same page where Bell Atlantic outlined the anticipated benefits of the merger with GTE, it stated the following:

Α.

Both GTE and Bell Atlantic have proven track records in successfully and quickly integrating business operations. GTE today thrives as a highly focused, integrated company after a series of major acquisitions over the past decade, including the acquisitions of Contel Corporation in 1991 and BBN Corporation in 1997. Bell Atlantic and NYNEX formed a wireless joint venture in 1994. By 1996, the wireless joint venture achieved a market leadership position with innovative products, faster customer growth and sharply improved profitability, which were further enhanced when the two companies merged in 1997. The integration of Bell Atlantic and NYNEX is now largely complete, and the forecast efficiencies are being achieved successfully.

[Emphasis added] (see page I-24 of Bell Atlantic Form S-4 filed
April 13 1999 attached as Exhibit WRF-6).

Based on the foregoing statement, Verizon should realize the anticipated GTE merger savings fairly rapidly. These expected savings should be considered in lockstep with this Commission previous determination that BellSouth, which is a much smaller carrier in total size than Verizon, should recover common costs using a 6.24% factor (see *May 25, 2001 UNE Order*, page 326-327). This is less than half of Verizon – FL's proposed common cost factor. By any measure of reasonableness, Verizon – FL's common cost factor should be within a few percentage points, either higher or lower, of BellSouth's factor.

Q. PLEASE EXPLAIN YOUR CRITICISM OF VERIZON – FL'S COMMON COST FACTOR METHODOLOGY.

A. First of all, Verizon – FL calculated two versions of its common cost factor within its cost studies. The 14.09% factor proposed by Verizon – FL (see Trimble direct, Exhibit DBT-1) is the result of dividing common costs by direct costs. While using direct cost as the denominator may be an acceptable method, the Verizon predecessor, GTE, typically used total regulated revenue as the denominator. In fact, Verizon – FL prepared an alternative common cost factor in its cost study documentation using total regulated revenues as the denominator resulting in an 11.55% factor (see Attachment Q within the ICM Expense documentation). Mr. Trimble presents no explanation as to why the higher factor

based upon direct costs was chosen over the one based upon total regulated revenues. Consequently, the Commission should consider the lower factor based on revenue in conjunction with the company-wide merger savings noted above to ensure UNE rates are not overstated due to some arbitrary decision made by Verizon – FL.

Secondly, Verizon – FL gave no consideration to the alternative cost recovery method suggested by the FCC in the Local Competition Order. While acknowledging that a percentage markup over directly attributable forward-looking cost was a reasonable allocation method, the FCC also suggested that second reasonable method would allocate only a relatively small share of common costs to certain critical network elements, such as the local loop and collocation that are considered bottleneck facilities (¶ 696). The FCC concluded that this method would ensure that prices of network elements that are least likely to be subject to competition are not artificially inflated by a large allocation of common costs. Therefore, the Commission should consider requiring Verizon – FL to allocate a smaller portion of common costs to UNE loops.

Q. DO YOU AGREE WITH MR. TRIMBLE'S PROPOSAL TO RECOVER A UNIFORM AMOUNT OF COMMON COSTS FOR A PARTICULAR UNE REGARDLESS OF THE DEAVERAGED ZONE COSTS?

A. No, I do not. Mr. Trimble explains his rationale for applying a uniform or fixed amount of common cost to a UNE on pages 33-34 of his direct testimony. He states that it is unreasonable to assign a larger share of common costs to rural UNE loops than to urban loops. He therefore spreads common cost recovery

equally over each deaveraged zone for a UNE. This practice is inconsistent with the concept of deaveraging costs where higher cost areas bear the cost required to serve that area. Common cost recovery should be treated no differently than direct and shared costs that have been deaveraged. If Verizon – FL chooses to use a fixed allocator methodology to recover common costs, it should apply this allocator to the deaveraged TELRIC costs, not just to the statewide average TELRIC cost of a UNE. The consequence of Verizon – FL's proposal is an unjustified overstatement of its Zone 1 costs. Where a 2-wire loop is priced at \$22.17 in Zone 1 using Verizon – FL's proposed inputs and its deaveraging methodology (see Trimble direct testimony, Exhibit DBT-2, page 1 of 8), it should cost \$21.60 (\$18.94 TELRIC cost in Zone 1 + (\$18.94 * 14.09% common cost allocator)). Verizon – FL is simply raising the price in the zone most likely to experience competition initially without justification. Therefore, the Commission should require Verizon – FL to re-calculate its deaveraged rates by applying the common cost allocator as a percentage to each zone, not a fixed cost additive.

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Q. SHOULD VERIZON – FL BE PERMITTED TO RECOVER EXTERNAL RELATIONS AND LEGAL COSTS FROM ALECS?

There should be no lobbying, legal, and regulatory costs included in Verizon – FL's common cost recovery to the extent they are incurred in a way that is adverse to the interests of ALECs. These costs are generally incurred for both retail and wholesale services. During my review of Verizon – FL's supporting adjustment factor schedule (see Attachment I in ICM Expense documentation), it appears that Verizon – FL removed approximately 15% of

its external relations (USOA 6722) and legal expense (USOA 6725) in its Wholesale Adjust 1 Factor (Column H). However, none of the expenses attributable to litigation and other actions adverse to the efforts of ALECs should be included in UNE rates. There are two reasons for this: (1) the legal, lobbying, and regulatory efforts exerted by incumbents are generally expended for the benefit of Verizon - FL's retail offerings; and. (2) the ALECs incur their own costs such as these, which are not recovered, in whole or in part, from the incumbent LECs. It is fundamentally unfair to require ALECs to support legal, lobbying and regulatory costs that are typically expended against them. The only allowable costs should be those associated with normal company operations and compliance with administrative requirements of state commissions such as tariff filings. All other expenses spent litigating and lobbying against ALEC interests should be removed. Absent such a disclosure, all of these costs should be removed. If the Commission were to order all of these expenses removed, Verizon - FL's common cost factor would decline from 14.09% to 12.97% if the direct cost denominator was used and from 11.55% to 10.6% if total regulated revenue were used as the denominator. These adjusted common cost factors require further reduction to account for the broader savings from the Bell Atlantic / GTE merger.

IV. CONCLUSION AND RECOMMENDATIONS

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Q. BASED ON YOUR ANALYSIS OF VERIZON – FL'S TESTIMONY AND
COST SUPPORT IN THIS PROCEEDING, WHAT ARE YOUR
CONCLUSIONS AND RECOMMENDATIONS?

A. I recommend that the Commission require the following:

- 1. Use the Sprint rate banding methodology to deaverage the relevant Verizon FL UNEs. While I believe that Sprint's proposed ± 20% deviation standard is a reasonable benchmark to use in grouping wire centers by their forward-looking cost, the Commission can set a higher deviation standard if it decides to limit the number of rate zones or bands. However, the essential considerations in determining the number of zones is not administrative expediency, but the proper grouping of UNEs to reflect the spectrum of the costs required to provision those UNEs and ensuring that competitive activity is not restricted.
 - Reject Verizon FL's use of a 12.95% cost of capital and financial reporting lives for depreciation. Instead, the Commission should require Verizon – FL to re-run its cost studies with the cost of capital and depreciation lives recommended by Dr. Ankum.
 - 3. Reject Verizon FL's use of the C. A. Turner indices to inflate book investment values and its use of ICM investment in its expense-to-investment ratio calculations.
 - 4. For common cost recovery, the Commission should (1) require Verizon to properly account for its realized and expected merger savings and to determine a common cost factor that is consistent with Verizon being one of the largest ILECs in the country (2) use the

	removal of lobbying, regulatory and legal expenses would reduce Verizon –
2	FL's proposed factor of 14.09% to 10.6%, resulting in a decrease in the
3	common costs added to the statewide average 2-wire loop rate of \$0.80
4	(\$3.23 - \$2.43).

5 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

6 A. Yes, it does.

Sprint Rate Banding Model - Recreated by QSI Consulting Populated with data for a 2-Wire Loop w/ NID for Verizon

С	olumn Numbe	rs for Vertic	al Look Tabl	e (area sha	ded in bright y	ellow)
1	2	3	4	5	6	7

Rate			Total			
Band		Number of	Lines	Monthly	Total	Percent of Total
ID	Rate Band	Wire Centers	Served	Cost	Monthly Cost	Lines
1	Rate Band 1	13	65,478	\$ 8,93	\$ 584,719	2.63%
2	Rate Band 2	14:	493;469	\$ 16.44	\$ 8,114,865	19.84%
- 3	Rate Band 3	41	1,477,142	\$ 21.42	\$ 31,643,725	59:40%
4	Rate Band 4	16	339,735	\$ 30.28	\$ 10,286,669	13.66%
5 -	Rate Band 5	7	60,287	\$ 40.25	\$ 2,426,735	2.42%
6	Rate Band 6	7.	40,235	\$ 59.81	\$ 2,406,359	1.62%
7.	Rate Band 7	3	7,066	\$ 127.01	\$ 897,441	0.28%
8	Rate Band 8	10	3,383	\$ 202.58	\$ 685,328	0.14%
9 .	Rate Band 9	- 道·	· (4)	\$ -	\$ -	0.00%
10%	Rate Band 10	143.89		\$ -	S	0.00%
111	Rate Band 11	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		\$ -	S ' :-	0,00%
12	Rate Band 12		- 100 W	\$	\$ -	0.00%

		USER INPUTS				,
		Total			Percent of Total	Percentage
Relie		Lines	Monthly	Total	Lines in	Deviation from
Exame	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	TAMPFLXX22H	65,478	\$8.93	\$584,718.54	100.00%	0.00%
2)	BHPKFLXA28H	27,881	\$13.27	\$369,980.87	5.65%	-19.30%
	UNVRFLXA97H	51,245	\$15.64	\$801,471.80	10.38%	-4.89%
	SPBGFLXA89H	53,677	\$15.71	\$843,265.67	10.88%	-4.47%
(3)	SEKYFLXA34H	13,697	\$16.06	\$219,973.82	2.78%	-2.34%
	SRSTFLXA95H	62,277	\$16.12	\$1,003,905.24	12.62%	-1.97%
	SARKFLXARSA	3,300	\$16.20	\$53,460.00	0.67%	-1.49%
	GNDYFLXA57H	25,379	\$16.22	\$411,647.38	5,14%	-1.37%
2	WSSDFLXA87H	49,667	\$16.35	\$812,055.45	10.06%	-0.57%
	SGBEFLXA36H	19,313	\$16.70	\$322,527.10	3.91%	_ 1.55%
5,	INRKFLXX59H	26,427	\$16.77	\$443,180.79	5.36%	1.98%
	SWTHFLXA88H	54,554	\$17.26	\$941,602.04	11.06%	4.96%
	FHSDFLXA57H	17,342	\$17.40	\$301,750.80	3.51%	5.81%
	CLWRFLXA44H	63,066	\$17.82	\$1,123,836.12	12.78%	8.36%
	SPBGFLXS86H	25,644	\$18.18	\$466,207.92	5.20%	10.55%

	Total			Percent of Total	Percentage
হিন্ <u>ত</u>	Lines	Monthly	Total	Lines in	Deviation from
्र हिन्ताची Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
LRGOFLXA58H	41,905	\$18.34	\$768,537.70	2.84%	-14.39%
3 HYPKFLXADS0	24,670	\$18.41	\$454,174.70	1.67%	-14.06%
CNSDFLXA79H	56,373	\$18.74	\$1,056,430.02	3.82%	-12.52%
TMTRFLXADS0	35,833	\$18.76	\$672,227.08	2.43%	-12.43%
PSDNFLXA34H	36,452	\$18.89	\$688,578.28	2.47%	-11.82%
ANMRFLXA77H	9,121	\$18.95	\$172,842.95	0.62%	-11.54%
3 BRBAFLXA75H	56,959	\$19.06	\$1,085,638.54	3.86%	-11.03%
PNLSFLXA53H	51,435	\$19.14	\$984,465.90	3.48%	-10.65%
SNSPFLXA37H	20,111	\$19.19	\$385,930.09	1.36%	-10.42%
DNDNFLXA73H	27,600	\$19.71	\$543,996.00	1.87%	-7.99%
LGBKFLXA38H	12,996	\$19.93	\$259,010.28	0.88%	-6.97%
3 WLCRFLXA83H	35,927	\$20.11	\$722,491.97	2.43%	-6.13%
BAYUFLXA54H	37,895	\$20.15	\$763,584.25	2.57%	-5.94%
SLSPFLXA93H	36,708	\$20.43	\$749,944.44	2.49%	-4.63%
NGBHFLXA39H	53,845	\$20.53	\$1,105,437.85	3.65%	-4.17%
SMNLFLXA23H	20,455	\$20.64	\$422,191.20	1.38%	-3.65%
LLMNFLXADS0	44,379	\$20.76	\$921,308.04	3.00%	-3.09%
YBCTFLXA24H	15,914	\$20.77	\$330,533.78	1.08%	-3.04%
VENCFLXA48H	33,436	\$21.09	\$705,165.24	2.26%	-1.55%
ENWDFLXA47H	23,757	\$21.19	\$503,410.83	1.61%	-1.08%
OLDSFLXA85H	21,447	\$21.30	\$456,821.10	1.45%	-0.57%
BRTNFLXX74H	44,128	\$21.42	\$945,221.76	2.99%	-0.01%
SKWYFLXADS0	28,899	\$21.73	\$627,975.27	1.96%	1.44%
STGRFLXA78H	57,974	\$21.77	\$1,262,093.98	3.92%	1.62%
CRWDFLXA96H	61,713	\$22.23	\$1,371,879.99	4.18%	3.77%
SSDSFLXA92H	52,371	\$22.37	\$1,171,539.27	3.55%	4.42%
LKLDFLXA68H	49,282	\$22.46	\$1,106,873.72	3.34%	4.84%
NPRCFLXA84H	59,910	\$22.66	\$1,357,560.60	4.06%	5.78%
PLSLFLXA79H	26,769	\$22.76	\$609,262.44	1.81%	6.24%
VENCFLXSDS0	24,694	\$22.79	\$562,776.26	1.67%	6.38%
BRNDFLXA68H	82,667	\$22.97	\$1,898,860.99	5.60%	7.22%
NRSDFLXA35H	30,294	\$23.23	\$703,729.62	2.05%	8.44%
TAMPFLXEDS0	46,404	\$23.32	\$1,082,141.28	3.14%	8.86%
TRSPFLXA93H	45,652	\$23.44	\$1,070,082.88	3.09%	9.42%
HGLDFLXA64H	37,359	\$23.89	\$892,506.51	2.53%	11.52%
SPRGFLXA37H	36,174	\$24.01	\$868,537.74	2.45%	12.08%
CYGRFLXA32H	14,216	\$24.12	\$342,889.92	0.96%	12.59%
WNHNFLXC29H	36,682	\$24.18	\$886,970.76	2.48%	12.87%
LUTZFLXA94H	18,635	\$24.91	\$464,197.85	1.26%	16.28%
OSPRFLXA96H BBDLFLXA96H	11,026	\$25.27	\$278,627.02	0.75%	17.96%
in the large world in the same with the same same same same same same same sam	15,075	\$25.69	\$387,276.75	1.02%	19.92%
LKLDFLXE66H HDSNFLXA86H	23,086	\$25.86	\$597,003.96	6.80%	-14.59%
BARTFLXA53H	41,016	\$27.06	\$1,109,892.96	12.07%	-10.63%
ZPHYFLXA78H	15,350	\$27.57	\$423,199.50	4.52%	-8.95%
PLMTFLXA78H	34,588	\$28.48 \$20.51	\$985,066.24	10.18%	-5.94%
WLCHFLXA97H	26,139	\$29.51 \$29.83	\$771,361.89	7.69% 6.00%	-2.54%
ALFAFLXA67H	20,535		\$608,114.38	6.04%	-1.48%
ALIAFLAMOIT	20,000	\$30.28	\$621,799.80	0.04%	0.00%

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声声注:		Lines	Monthly	Total	Lines in	Deviation from
± 1515151	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	LKWLFLXA67H	16,639	\$31.22	\$519,469.58	4.90%	3.11%
	RSKNFLXA64H	13.117	\$31.24	\$409,775.08	3.86%	3.18%
	NRPTFLXA42H	19,275	\$31.64	\$609,861.00	5.67%	4.50%
	LKLDFLXN85H	30,084	\$32.10	\$965,696.40	8.86%	6.02%
	HNCYFLXA42H	18,480	\$32.55	\$601,524.00	5.44%	7.50%
	KYSTFLXA92H	18,533	\$33.17	\$614,739.61	5.46%	9.55%
2.1	MLBYFLXARSA	7,148	\$33.86	\$242,031.28	2.10%	11.83%
	PTCYFLXA75H	33,749	\$33.99	\$1,147,128.51	9.93%	12.26%
	BYSHFLXA84H	1,610	\$37,.27	\$60,004.70	0.47%	23.09%
0.	POINFLXARSA	2,237	\$37.82	\$84,603.34	3.71%	-6.04%
2 12 12 12 12 12 12 12 12 12 12 12 12 12	THNTFLXADS0	8,649	\$38.39	\$332,035.11	14.35%	-4.63%
	WIMMFLXA63H	17,293	\$38.40	\$664,051.20	28.68%	-4.60%
	MNLKFLXA85H	10,596	\$39.25	\$415,893.00	17.58%	-2.49%
-31	HNCYFLXN424	13,085	\$40.92	\$535,438.20	⁻ 21.70% ⁻	1.66%
5	BBPKFLXARSA	3,326	\$46.24	\$153,794.24	5.52%	14.87%
	LKALFLXA95H	5,101	\$47.23	\$240,920.23	8.46%	17.33%
	DUNDFLXA43H	7,393	\$52.23	\$386,136.39	18.37%	-12.67%
ĵ.	LNLKFLXA99H	9,377	\$56.69	\$531,582.13	23.31%	-5.21%
î	ALTRFLXARSA	2,589	\$56:84	\$147,158.76	6.43%	-4.96%
5	PNCRFLXA73J	5,174	\$60.30	\$311,992.20	12.86%	0.82%
	PKCYFLXARSA	5,762	\$63.17	\$363,985.54	14.32%	5.62%
ć	FRSTFLXA63H	6,008	\$66.07	\$396,948.56	14.93%	10.47%
	LKWLFLXERSA	3,932	\$68.30	\$268,555.60	9.77%	14.20%
	BRJTFLXARSA	1,266	\$106.72	\$135,107.52	17.92%	-15.97%
	PRSHFLXARSA	4,208	\$131.22	\$552,173.76	59.55%	3.32%
	INLKFLXARSA	1,592	\$132.01	\$210,159.92	, 22.53%	3.94%
	MYCYFLXA32H	3,383	\$202.58	\$685,328.14	100.00%	0.00%
				\$0.00	#N/A	#N/A

1 ABDLFLXA96H 2 ALFAELXA67H 2 O.535 \$ 0.28 3 ALTRETXARSA 3 ALTRETXARSA 4 ANMRELXA77H 9,121 \$ 18.95 5 BARTIFLXARSA 37,895 \$ 20.15 7 BBPKFLXARSA 37,895 \$ 20.15 7 BBPKFLXARSA 37,895 \$ 20.15 7 BBPKFLXARSA 37,895 \$ 20.15 7 BBPKFLXA75H 56,999 \$ 19.06 10 BRJTFLXARSA 1,266 \$ 106.72 11 BRNDFLXA68H 1,610 \$ 37.27 12 BRTNFLXX74H 44,128 \$ 21.42 13 BYSHFLXA84H 1,610 \$ 37.27 14 CLWRFLXA43H 1,610 \$ 37.27 15 CNSDFLXA79H 16 CRWDFLXA96H 16,713 \$ 22.23 17 CYGRRLXA32H 14,216 \$ 24.12 18 DNDNFLXA73H 27,600 \$ 19.71 19 DUNDFLXA43H 7,393 \$ 52.23 20 ENWDFLXA47H 23,757 \$ 21.19 21 FHSDFLXA67H 22 FRSTFLXA83H 4,016 \$ 27.06 22 FRSTFLXA88H 4,016 \$ 37.26 23 GNDYFLXA57H 25,379 \$ 16.22 24 HDSNFLXA57H 25,379 \$ 16.22 24 HDSNFLXA86H 41,016 \$ 27.06 25 HGLDFLXA68H 41,016 \$ 27.06 26 HNCYFLXA42H 18,480 \$ 32.55 27 HNCYFLXN42H 18,480 \$ 32.55 27 HNCYFLXN42H 18,480 \$ 32.55 27 HNCYFLXA42H 18,480 \$ 32.55 27 HNCYFLXA49H 18,480 \$ 32.55 27 HNCYFLXA98H 31 KYSTFLXA98H 31 KALFLXARSA 1,592 \$ 132.01 31 INKFLXARSA 1,592 \$ 132.01 31 INKFLXARSA 1,592 \$ 132.01 31 INKFLXARSA 31 LKULFLXARSA 32 LKULFLXARSA 33 LKALFLXA98H 34 LKLDFLXA68H 39,292 \$ 22.46 35 LKLDFLXA68H 49,292 \$ 22.46 36 LKLDFLXA68H 49,292 \$ 20.76 40 LNLKFLXARSA 31 LSMFLXABSA 41 MNLKFLXARSA 31 SABA 44 MNLKFLXARSA 45 MNLKFLXARSA 46 MNLKFLXARSA 47 NPCGLXABSH 48 NRPTFLXABSH 49,202 \$ 20.58 46 NGBHFLXA39SH 47 NPCGLXABSH 48 NRPTFLXABSH 48 NRPTFLXABSH 49,202 \$ 20.58 46 NGBHFLXA39SH 59,910 \$ 22.66 48 NRPTFLXABSH 59,910 \$ 22.66									
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45 MYCYFLXA32H 3,383 \$ 202.58 46 NGBHFLXA39H 53,845 \$ 20.53 47 NPRCFLXA84H 59,910 \$ 22.66 48 NRPTFLXA42H 19,275 \$ 31.64				\$					
46 NGBHFLXA39H 53,845 \$ 20.53 47 NPRCFLXA84H 59,910 \$ 22.66 48 NRPTFLXA42H 19,275 \$ 31.64				\$					
47 NPRCFLXA84H 59,910 \$ 22.66 48 NRPTFLXA42H 19,275 \$ 31.64				\$					
48 NRPTFLXA42H 19,275 \$ 31.64				\$					
·				\$					
			-	\$					
49 NRSDFLXA35H 30,294 \$ 23.23									
50 OLDSFLXA85H 21,447 \$ 21.30		50 OLDSFLXA85H	21,447	\$	21.30				

	51 OSPRFLXA96H	11,026	\$	25.27
	52 PKCYFLXARSA	5,762	\$	63.17
	53 PLMTFLXA72H	26,139	\$	29.51
	54 PLSLFLXA79H	26,769	\$	22.76
	55 PNCRFLXA73J	5,174	\$	60.30
	56 PNLSFLXA53H	51,435	\$	19.14
	57 POINFLXARSA	2,237	\$	37.82
	58 PRSHFLXARSA	4,208	\$	131.22
	59 PSDNFLXA34H	36,452	\$	18.89
	60 PTCYFLXA75H	33,749	\$	33.99
	61 RSKNFLXA64H	13,117	\$	31.24
	62 SARKFLXARSA	3,300	\$	16.20
	63 SEKYFLXA34H	13,697	\$	16.06
	64 SGBEFLXA36H	19,313	\$	16.70
	65 SKWYFLXADS0	28,899	\$	21.73
	66 SLSPFLXA93H	36,708	\$	20.43
	67 SMNLFLXA23H	20,455	\$	20.64
	68 SNSPFLXA37H	20,111	\$	19.19
	69 SPBGFLXA89H	53,677	\$	15.71
	70 SPBGFLXS86H	25,644	\$	18.18
	71 SPRGFLXA37H	36,174	\$	24.01
	72 SRSTFLXA95H	62,277	\$	16.12
	73 SSDSFLXA92H	52,371	\$	22.37
	74 STGRFLXA78H	57,974	\$	21.77
	75 SWTHFLXA88H	54,554	\$	17.26
	76 TAMPFLXEDS0	46,404	\$	23.32
	77 TAMPFLXX22H	65,478	\$	8.93
	78 THNTFLXADS0	8,649	\$	38.39
	79 TMTRFLXADS0	35,833	\$	18.76
	80 TRSPFLXA93H	45,652	\$	23.44
	81 UNVRFLXA97H	51,245	\$	15.64
	82 VENCFLXA48H	33,436	\$	21.09
	83 VENCFLXSDS0	24,694	\$	22.79
	84 WIMMFLXA63H	17,293	\$	38.40
	85 WLCHFLXA97H	20,386	\$	29.83
	86 WLCRFLXA83H	35,927	\$	29.03
	87 WNHNFLXC29H	36,682	\$ \$	24.18
	88 WSSDFLXA87H	49,667	Ф \$	16.35
	89 YBCTFLXA24H	49,667 15,914	\$	20.77
	90 ZPHYFLXA78H	34,588	\$ \$	28.48
-	SU ZENTELAA/ON	J4,J00	Φ	20.40

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1 TAMPFLXX22H	65,478	\$	8.93
2 BHPKFLXA28H	27,881	\$	13.27
3 UNVRFLXA97H	51,245	\$	15.64
4 SPBGFLXA89H	53,677	\$	15.71
5 SEKYFLXA34H	13,697	\$	16.06
6 SRSTFLXA95H	62,277	\$	16.12
	•		
7 SARKFLXARSA	3,300	\$	16.20
8 GNDYFLXA57H	25,379	\$	16.22
9 WSSDFLXA87H	49,667	\$	16.35
10 SGBEFLXA36H	19,313	\$	16.70
11 INRKFLXX59H	26,427	\$	16.77
12 SWTHFLXA88H	54,554	\$	17.26
13 FHSDFLXA57H	17,342	\$	17.40
14 CLWRFLXA44H	63,066	\$	17.82
15 SPBGFLXS86H	25,644	\$	18.18
16 LRGOFLXA58H	41,905	\$	18.34
17 HYPKFLXADS0	24,670	\$	18.41
18 CNSDFLXA79H	56,373	\$	18.74
19 TMTRFLXADS0	35,833	\$	18.76
20 PSDNFLXA34H	36,452	\$	18.89
21 ANMRFLXA77H	9,121	\$	18.95
22 BRBAFLXA75H	-		
	56,959	\$	19.06
23 PNLSFLXA53H	51,435	\$	19.14
24 SNSPFLXA37H	20,111	\$	19.19
25 DNDNFLXA73H	27,600	\$	19.71
26 LGBKFLXA38H	12,996	\$	19.93
27 WLCRFLXA83H	35,927	\$	20.11
28 BAYUFLXA54H	37,895	\$	20.15
29 SLSPFLXA93H	36,708	\$	20.43
30 NGBHFLXA39H	53,845	\$	20.53
31 SMNLFLXA23H	20,455	\$	20.64
32 LLMNFLXADS0			
	44,379	\$	20.76
33 YBCTFLXA24H	15,914	\$	20.77
34 VENCFLXA48H	33,436	\$	21.09
35 ENWDFLXA47H	23,757	\$	21.19
36 OLDSFLXA85H	21,447	\$	21.30
37 BRTNFLXX74H	44,128	\$	21.42
38 SKWYFLXADS0	28,899	\$	21.73
	•		
39 STGRFLXA78H	57,974	\$	21.77
40 CRWDFLXA96H	61,713	\$	22.23
41 SSDSFLXA92H	52,371	\$	22.37
42 LKLDFLXA68H	•		
	49,282	\$	22.46
43 NPRCFLXA84H	59,910	\$	22.66
44 PLSLFLXA79H	26,769	\$	22.76
45 VENCFLXSDS0	- 24,694	\$	22.79
46 BRNDFLXA68H	82,667	\$	22.97
47 NRSDFLXA35H	30,294	\$	23.23
48 TAMPFLXEDS0	46,404	\$	23.32
•			
49 TRSPFLXA93H	45,652	\$	23.44
50 HGLDFLXA64H	37,359	\$	23.89
	•	•	

51 SPRGFLXA37H	36,174	\$ 24.01	
52 CYGRFLXA32H	14,216	\$ 24.12	
53 WNHNFLXC29H	36,682	\$ 24.18	
54 LUTZFLXA94H	18,635	\$ 24.91	
55 OSPRFLXA96H	11,026	\$ 25.27	
56 ABDLFLXA96H	15,075	\$ 25.69	
57 LKLDFLXE66H	23,086	\$ 25.86	
58 HDSNFLXA86H	41,016	\$ 27.06	
59 BARTFLXA53H	15,350	\$ 27.57	
60 ZPHYFLXA78H	34,588	\$ 28.48	
61 PLMTFLXA72H	26,139	\$ 29.51	
62 WLCHFLXA97H	20,386	\$ 29.83	
63 ALFAFLXA67H	20,535	\$ 30.28	
64 LKWLFLXA67H	16,639	\$ 31.22	
65 RSKNFLXA64H	13,117	\$ 31.24	
66 NRPTFLXA42H	19,275	\$ 31.64	
67 LKLDFLXN85H	30,084	\$ 32.10	
68 HNCYFLXA42H	18,480	\$ 32.55	
69 KYSTFLXA92H	18,533	\$ 33.17	
70 MLBYFLXARSA	7,148	\$ 33.86	
71 PTCYFLXA75H	33,749	\$ 33.99	
72 BYSHFLXA84H	1,610	\$ 37.27	
73 POINFLXARSA	2,237	\$ 37.82	
74 THNTFLXADS0	8,649	\$ 38.39	
75 WIMMFLXA63H	17,293	\$ 38.40	
76 MNLKFLXA85H	10,596	\$ 39.25	
77 HNCYFLXN424	13,085	\$ 40.92	
78 BBPKFLXARSA	3,326	\$ 46.24	
79 LKALFLXA95H	5,101	\$ 47.23	
80 DUNDFLXA43H	7,393	\$ 52.23	
81 LNLKFLXA99H	9,377	\$ 56.69	
82 ALTRFLXARSA	2,589	\$ 56.84	
83 PNCRFLXA73J	5,174	\$ 60.30	
84 PKCYFLXARSA	5,762	\$ 63.17	
85 FRSTFLXA63H	6,008	\$ 66.07	
86 LKWLFLXERSA	3,932	\$ 68.30	
87 BRJTFLXARSA	1,266	\$ 106.72	
88 PRSHFLXARSA	4,208	\$ 131.22	
89 INLKFLXARSA	1,592	\$ 132.01	
90 MYCYFLXA32H	3,383	\$ 202.58	
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Sprint Rate Banding Model - Recreated by QSI Consulting Populated with data for a 2-Wire Loop w/ NID for Verizon (COLLAPSED TO THREE ZONES)

	Co	olumn Numbe	rs for Vertic	al Look Tab	e (area sha	ded in bright y	rellow)
Ī	1	2	3	4	5	6	7

Rate Band ID	Rate Band	Number of Wire Centers	Total Lines Served	onthly Cost	N	Total Ionthly Cost	Percent of Tota Lines
-1	Rate Band 1		558,947	\$ 15,56	\$	8,699,584	22.48%
2	Rate Band 2	41	1,477,142	\$ 21:42	\$	31,643,725	59.40%
3	Rate Band 3	34	450,706	\$ 37.06	\$	16,702,533	18.12%
4	Rate Band 4	5.05		\$ 76 J	\$		0.00%
5	Rate Band 5		1	\$	\$		0.00%
6	Rate Band 6	- I		\$ 2.570	\$		0.00%
7	Rate Band 7		in the Early State of the State	\$ in the ⊆	\$	F. 1	0.00%
8	Rate Band 8	- 1		\$	\$		0.00%
9 :	Rate Band 9		entra Santa	\$ 	\$	-	0.00%
10	Rate Band 10		and the first	\$	\$	7	0.00%
11,	Rate Band 11		<u>.</u>	\$	\$		0.00%
12	Rate Band 12	1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2	-	\$ 	\$		0.00%
	Totals	90	2,486,795	\$ 22.94	\$	57,045,841	100.00%

		USER INPUTS	,			
		Total			Percent of Total	Percentage
िस्	ana in in	Lines	Monthly	Total	Lines in	Deviation from
Erstere	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	TAMPFLXX22H	65,478	\$8.93	\$584,718.54	11.71%	-42.62%
	BHPKFLXA28H	27,881	\$13.27	\$369,980.87	4.99%	-14.74%
	UNVRFLXA97H	51,245	\$15.64	\$801,471.80	9.17%	0.49%
	SPBGFLXA89H	53,677	\$15.71	\$843,265.67	9.60%	0.94%
	SEKYFLXA34H	13,697	\$16.06	\$219,973.82	2.45%	3.19%
	SRSTFLXA95H	62,277	\$16.12	\$1,003,905.24	11.14%	3.57%
	SARKFLXARSA	3,300	\$16.20	\$53,460.00	0.59%	4.08%
	GNDYFLXA57H	25,379	\$16.22	\$411,647.38	4.54%	4.21%
	WSSDFLXA87H	49,667	\$16.35	\$812,055.45	8.89%	5.05%
	SGBEFLXA36H	19,313	\$16.70	\$322,527.10	3.46%	7.30%
	INRKFLXX59H	26,427	\$16.77	\$443,180.79	4.73%	7.75%
	SWTHFLXA88H	54,554	\$17.26	\$941,602.04	9.76%	10.90%
	FHSDFLXA57H	17,342	\$17.40	\$301,750.80	3.10%	11.79%
and the standard of the standa	CLWRFLXA44H	63,066	\$17.82	\$1,123,836.12	11.28%	14.49%
	SPBGFLXS86H	25,644	\$18.18	\$466,207.92	4.59%	16.81%

		Total			Percent of Total	Percentage
		Lines	Monthly	Total	Lines in	Deviation from
Wire Cer	nter	Served	Cost	Monthly Cost	Rate Band	Average
LRGOFL		41,905	\$18.34	\$768,537.70	2.84%	-14.39%
HYPKFL	XADS0	24,670	\$18.41	\$454,174.70	1.67%	-14.06%
CNSDFL	XA79H	56,373	\$18.74	\$1,056,430.02	3.82%	-12.52%
2 TMTRFL	XADS0	35,833	\$18.76	\$672,227.08	2.43%	-12.43%
PSDNFL	XA34H	36,452	\$18.89	\$688,578.28	2.47%	-11.82%
ANMRFL	XA77H	9,121	\$18.95	\$172,842.95	0.62%	-11.54%
2 BRBAFL	XA75H	56,959	\$19.06	\$1,085,638.54	3.86%	-11.03%
PNLSFL	XA53H	51,435	\$19.14	\$984,465.90	3.48%	-10.65%
SNSPFL	XA37H	20,111	\$19.19	\$385,930.09	1.36%	-10.42%
DNDNFL	XA73H	27,600	\$19.71	\$543,996.00	1.87%	-7.99%
LGBKFL	XA38H	12,996	\$19.93	\$259,010.28	0.88%	-6.97%
WLCRFL	XA83H	35,927	\$20.11	\$722,491.97	2.43%	-6.13%
BAYUFL	XA54H	37,895	\$20.15	\$763,584.25	2.57%	-5.94%
SLSPFL	XA93H	36,708	\$20.43	\$749,944.44	2.49%	-4.63%
NGBHFL	XA39H	53,845	\$20.53	\$1,105,437.85	3.65%	-4.17%
SMNLFL	XA23H	20,455	\$20.64	\$422,191.20	1.38%	-3.65%
LLMNFL	XADS0	44,379	\$20.76	\$921,308.04	3.00%	-3.09%
YBCTFL	XA24H	15,914	\$20.77	\$330,533.78	1.08%	-3.04%
VENCFL	XA48H	33,436	\$21.09	\$705,165.24	2.26%	-1.55%
ENWDF	XA47H	23,757	\$21.19	\$503,410.83	1.61%	-1.08%
OLDSFL	XA85H	21,447	\$21.30	\$456,821.10	1.45%	-0.57%
BRTNFL	XX74H	44,128	\$21.42	\$945,221.76	2.99%	-0.01%
SKWYFL	XADS0	28,899	\$21.73	\$627,975.27	1.96%	1.44%
STGRFL	XA78H	57,974	\$21.77	\$1,262,093.98	3.92%	1.62%
CRWDF	LXA96H	61,713	\$22.23	\$1,371,879.99	4.18%	3.77%
SSDSFL	XA92H	52,371	\$22.37	\$1,171,539.27	3.55%	4.42%
LKLDFL	XA68H	49,282	\$22.46	\$1,106,873.72	3.34%	4.84%
NPRCFL	XA84H	59,910	\$22.66	\$1,357,560.60	4.06%	5.78%
PLSLFLX	KA79H	26,769	\$22.76	\$609,262.44	1.81%	6.24%
VENCFL	XSDS0	24,694	\$22.79	\$562,776.26	1.67%	6.38%
BRNDFL		82,667	\$22.97	\$1,898,860.99	5.60%	7.22%
NRSDFL		30,294	\$23.23	\$703,729.62	2.05%	8.44%
TAMPFL	XEDS0	46,404	\$23.32	\$1,082,141.28	3.14%	8.86%
TRSPFL	XA93H	45,652	\$23.44	\$1,070,082.88	3.09%	9.42%
HGLDFL		37,359	\$23.89	\$892,506.51	2.53%	11.52%
SPRGFL	XA37H	36,174	\$24.01	\$868,537.74	2.45%	12.08%
CYGRFL	XA32H	14,216	\$24,12	\$342,889.92	0.96%	12.59%
WNHNF	LXC29H	36,682	\$24.18	\$886,970.76	2.48%	12.87%
LUTZFL)	XA94H	18,635	\$24.91	\$464,197.85	1.26%	16.28%
OSPRFL		11,026	\$25.27	\$278,627.02	0.75%	17.96%
ABDLFL		15,075	\$25.69	\$387,276.75	1.02%	- 19.92%
LKLDFL:		23,086	\$25.86	\$597,003.96	5.12%	-30.22%
HDSNFL		41,016	\$27.06	\$1,109,892.96	9.10%	-26.98%
BARTFL		15,350	\$27.57	\$423,199.50	3.41%	-25.60%
ZPHYFL		34,588	\$28.48	\$985,066.24	7.67%	-23.15%
9 PLMTFL		26,139	\$29.51	\$771,361.89	5.80%	-20.37%
WLCHFL		20,386	\$29.83	\$608,114.38	4.52%	-19.51%
ALFAFL	XA67H	20,535	\$30.28	\$621,799.80	4.56%	-18.29%

		Total			Percent of Total	Percentage
Fig. 15		Lines	Monthly	Total	Lines in	Deviation from
Wire Wire	Center	Served	Cost	Monthly Cost	Rate Band	Average
2000 CD 0 10 - 002 31 1 24 1 44 0 3	FLXA67H	16,639	\$31.22	\$519,469.58	3.69%	-15.76%
RSKN	VFLXA64H	13,117	\$31.24	\$409,775.08	2.91%	-15.70%
NRPT	TFLXA42H	19,275	\$31.64	\$609,861.00	4.28%	-14.62%
LKLD	FLXN85H	30,084	\$32.10	\$965,696.40	6.67%	-13.38%
HNC	YFLXA42H	18,480	\$32.55	\$601,524.00	4.10%	-12.17%
₩YS1	FLXA92H	18,533	\$33.17	\$614,739.61	4.11%	-10.49%
MLB)	/FLXARSA	7,148	\$33.86	\$242,031.28	1.59%	-8.63%
PTOY	FLXA75H	33,749	\$33.99	\$1,147,128.51	7.49%	-8.28%
BYSH	IFLXA84H	1,610	\$37.27	\$60,004.70	0.36%	0.57%
POIN	FLXARSA	2,237	\$37.82	\$84,603.34	0.50%	2.05%
THNI	FLXADS0	8,649	\$38.39	\$332,035.11	1.92%	3.59%
WIM	//FLXA63H	17,293	\$38.40	\$664,051.20	3.84%	3.62%
MNL	KFLXA85H	10,596	\$39.25	\$415,893.00	2.35%	5.91%
HNC	/FLXN424	13,085	\$40.92	\$535,438.20	2.90%	10.42%
BBPK	(FLXARSA	3,326	\$46.24	\$153,794.24	0.74%	24.78%
LKAL	FLXA95H	5,101	\$47.23	\$240,920.23	1.13%	27.45%
DUNI	DFLXA43H	7,393	\$52.23	\$386,136.39	1.64%	40.94%
LNLK	FLXA99H	9,377	\$56.69	\$531,582.13	2.08%	52.97%
ALTR	FLXARSA	2,589	\$56:84	\$147,158.76	0.57%	53.38%
PNCF	RFLXA73J	5,174	\$60.30	\$311,992.20	1.15%	62.72%
PKCY	/FLXARSA	5,762	\$63.17	\$363,985.54	1.28%	70.46%
FRST	FLXA63H	6,008	\$66.07	\$396,948.56	1.33%	78.29%
LKW	FLXERSA	3,932	\$68.30	\$268,555.60	0.87%	84.30%
BRJT	FLXARSA	1,266	\$106.72	\$135,107.52	0.28%	187.98%
PRS	HFLXARSA	4,208	\$131.22	\$552,173.76	0.93%	254.09%
INLK	LXARSA	1,592	\$132.01	\$210,159.92	0.35%	256.22%
MYC	/FLXA32H	3,383	\$202.58	\$685,328.14	0.75%	446.65%
	100		Selfater less two	\$0.00	#N/A	#N/A

	1 ABDLFLXA96H	15,075	\$	25.69
	2 ALFAFLXA67H	20,535	\$	30.28
	3 ALTRFLXARSA	2,589	\$	56.84
	4 ANMRFLXA77H	9,121	\$	18.95
	5 BARTFLXA53H	15,350	\$	27.57
	6 BAYUFLXA54H	37,895	\$	20.15
	7 BBPKFLXARSA	3,326	\$	46.24
	8 BHPKFLXA28H	27,881	\$	13.27
	9 BRBAFLXA75H	56,959	\$	19.06
	10 BRJTFLXARSA	1,266	\$	106.72
	11 BRNDFLXA68H	82,667	\$	22.97
	12 BRTNFLXX74H	44,128	\$	21.42
	13 BYSHFLXA84H	1,610	\$	37.27
	14 CLWRFLXA44H	63,066	\$	17.82
	15 CNSDFLXA79H		\$	18.74
	16 CRWDFLXA96H		\$	22.23
	17 CYGRFLXA32H	•	\$	24.12
	18 DNDNFLXA73H		\$	19.71
	19 DUNDFLXA43H	•	\$	52.23
	20 ENWDFLXA47H		\$	21.19
	21 FHSDFLXA57H	•	\$	17.40
	22 FRSTFLXA63H		\$	66.07
	23 GNDYFLXA57H	•	\$	16.22
	24 HDSNFLXA86H		\$	27.06
	25 HGLDFLXA64H		\$	23.89
	26 HNCYFLXA42H		\$	32.55
	27 HNCYFLXN424		\$	40.92
	28 HYPKFLXADS0		\$	18.41
	29 INLKFLXARSA		\$	132.01
	30 INRKFLXX59H		\$	16.77
	31 KYSTFLXA92H		\$	33.17
	32 LGBKFLXA38H		\$	19.93
	33 LKALFLXA95H		\$	47.23
	34 LKLDFLXA68H	-	\$	22.46
	35 LKLDFLXE66H		\$	25.86
	36 LKLDFLXN85H		\$	32.10
	37 LKWLFLXA67H		\$	31.22
	38 LKWLFLXERSA	·	\$	68.30
	39 LLMNFLXADS0		\$	20.76
	40 LNLKFLXA99H		\$	56.69
	41 LRGOFLXA58H		\$	18.34
	42 LUTZFLXA94H		\$ \$	24.91
	43 MLBYFLXARSA		\$	33.86
	44 MNLKFLXA85H	-	\$ \$	39.25
	45 MYCYFLXA32H	•	\$	202.58
	46 NGBHFLXA39H		\$	20.53
,	47 NPRCFLXA84H		₽ \$	20.55
	48 NRPTFLXA42H		₽ \$	31.64
	49 NRSDFLXA35H		₽ \$	23.23
	50 OLDSFLXA85H		Р \$	23.23
	JU OLDOFLAROJA	41.441	and the same	

E4 CODDEL VACCU	44.000	æ	05.07
51 OSPRFLXA96H	11,026	\$	25.27
52 PKCYFLXARSA	5,762	\$	63.17 29.51
53 PLMTFLXA72H	26,139	\$	
54 PLSLFLXA79H	26,769	\$	22.76
55 PNCRFLXA73J	5,174	\$	60.30
56 PNLSFLXA53H	51,435	\$	19.14
57 POINFLXARSA	2,237	\$	37.82
58 PRSHFLXARSA	4,208	\$	131.22
59 PSDNFLXA34H	36,452	\$	18.89
60 PTCYFLXA75H	33,749	\$	33.99
61 RSKNFLXA64H	13,117	\$	31.24
62 SARKFLXARSA	3,300	\$	16.20
63 SEKYFLXA34H	13,697	\$	16.06
64 SGBEFLXA36H	19,313	\$	16.70
65 SKWYFLXADS0	28,899	\$	21.73
66 SLSPFLXA93H	36,708	\$	20.43
67 SMNLFLXA23H	20,455	\$	20.64
68 SNSPFLXA37H	20,111	-\$	19.19
69 SPBGFLXA89H	53,677	\$	15.71
70 SPBGFLXS86H	25,644	\$	18.18
71 SPRGFLXA37H	36,174	\$	24.01
72 SRSTFLXA95H	62,277	\$	16.12
73 SSDSFLXA92H	52,371	\$	22.37
74 STGRFLXA78H	57,974	\$	21.77
75 SWTHFLXA88H	54,554	\$	17.26
76 TAMPFLXEDS0	46,404	\$	23.32
77 TAMPFLXX22H	65,478	\$	8.93
78 THNTFLXADS0	8,649	\$	38.39
79 TMTRFLXADS0	35,833	\$	18.76
80 TRSPFLXA93H	45,652	\$_	23.44
81 UNVRFLXA97H	51,245	\$	15.64
82 VENCFLXA48H	33,436	\$	21.09
83 VENCFLXSDS0	24,694	\$	22.79
84 WIMMFLXA63H	17,293	\$	38.40
85 WLCHFLXA97H	20,386	\$	29.83
86 WLCRFLXA83H	35,927	\$	20.11
87 WNHNFLXC29H	36,682	\$	24.18
88 WSSDFLXA87H	49,667	\$	16.35
89 YBCTFLXA24H	15,914	\$	20.77
90 ZPHYFLXA78H	34,588	\$	28.48
oo zi iiii zwaon	0-7,000	Ψ	

	1 TAMPFLXX22H	65,478	\$	8.93
	2 BHPKFLXA28H		\$	13.27
	3 UNVRFLXA97H		\$	15.64
	4 SPBGFLXA89H	· · · · · · · · · · · · · · · · · · ·	\$	15.71
	5 SEKYFLXA34H		\$	16.06
	6 SRSTFLXA95H		\$	16.12
	7 SARKFLXARSA	•	\$	16.20
	8 GNDYFLXA57H	·	\$	16.22
	9 WSSDFLXA87H		Ψ \$	16.35
		•		
	10 SGBEFLXA36H	•	\$ •	16.70
	11 INRKFLXX59H	•	\$	16.77
	12 SWTHFLXA88H	•	\$	17.26
	13 FHSDFLXA57H	•	\$	17.40
	14 CLWRFLXA44H	•	\$	17.82
	15 SPBGFLXS86H	25,644	\$	18.18
-	16 LRGOFLXA58H	41,905	\$	18.34
	17 HYPKFLXADS0		\$	18.41
	18 CNSDFLXA79H		\$	18.74
	19 TMTRFLXADS0	•	\$	18.76
	20 PSDNFLXA34H		\$	18.89
	21 ANMRFLXA77H		Ψ \$	18.95
			φ \$	19.06
	22 BRBAFLXA75H	•		
	23 PNLSFLXA53H	•	\$ •	19.14
	24 SNSPFLXA37H	•	\$	19.19
	25 DNDNFLXA73H		\$	19.71
	26 LGBKFLXA38H	•	\$	19.93
	27 WLCRFLXA83H	•	\$	20.11
	28 BAYUFLXA54H		\$	20.15
	29 SLSPFLXA93H	36,708	\$	20.43
	30 NGBHFLXA39H	53,845	\$	20.53
	31 SMNLFLXA23H		\$	20.64
	32 LLMNFLXADS0	•	\$	20.76
	33 YBCTFLXA24H	•	\$	20.77
	34 VENCFLXA48H	•	\$	21.09
	35 ENWDFLXA47H		\$	21.19
	36 OLDSFLXA85H	•	Ψ \$	
		21,447	Φ	21.30
	37 BRTNFLXX74H		\$ •	21.42
•	38 SKWYFLXADS0	•	\$	21.73
	39 STGRFLXA78H	•	\$	21.77
	40 CRWDFLXA96H		\$	22.23
	41 SSDSFLXA92H		\$	22.37
	42 LKLDFLXA68H	49,282	\$	22.46
	43 NPRCFLXA84H		\$	22.66
	44 PLSLFLXA79H		\$	22.76
_	45 VENCFLXSDS0	•	\$	22.79
***	46 BRNDFLXA68H		\$	22.97
	47 NRSDFLXA35H		\$	23.23
	48 TAMPFLXEDS0		\$	23.32
	49 TRSPFLXA93H		φ \$	23.44
	50 HGLDFLXA64H	· ·	φ \$	23.89
	JU TIGLDFLAR04FI	37,308	Ψ	20.09

51 SPRGFLXA37H	36,174	\$ 24.01
52 CYGRFLXA32H	14,216	\$ 24.12
53 WNHNFLXC29H	36,682	\$ 24.18
54 LUTZFLXA94H	18,635	\$ 24.91
55 OSPRFLXA96H	11,026	\$ 25.27
56 ABDLFLXA96H	15,075	\$ 25.69
57 LKLDFLXE66H	23,086	\$ 25.86
58 HDSNFLXA86H	41,016	\$ 27.06
59 BARTFLXA53H	15,350	\$ 27.57
60 ZPHYFLXA78H	34,588	\$ 28.48
61 PLMTFLXA72H	26,139	\$ 29.51
62 WLCHFLXA97H	20,386	\$ 29.83
63 ALFAFLXA67H	20,535	\$ 30.28
64 LKWLFLXA67H	16,639	\$ 31.22
65 RSKNFLXA64H	13,117	\$ 31.24
66 NRPTFLXA42H	19,275	\$ 31.64
67 LKLDFLXN85H	30,084	\$ 32.10
68 HNCYFLXA42H	18,480	\$ 32.55
69 KYSTFLXA92H	18,533	\$ 33.17
70 MLBYFLXARSA	7,148	\$ 33.86
71 PTCYFLXA75H	33,749	\$ 33.99
72 BYSHFLXA84H	1,610	\$ 37.27
73 POINFLXARSA	2,237	\$ 37.82
74 THNTFLXADS0	8,649	\$ 38.39
75 WIMMFLXA63H	17,293	\$ 38.40
76 MNLKFLXA85H	10,596	\$ 39.25
77 HNCYFLXN424	13,085	\$ 40.92
78 BBPKFLXARSA	3,326	\$ 46.24
79 LKALFLXA95H	5,101	\$ 47.23
80 DUNDFLXA43H	7,393	\$ 52.23
81 LNLKFLXA99H	9,377	\$ 56.69
82 ALTRFLXARSA	2,589	\$ 56.84
83 PNCRFLXA73J	5,174	\$ 60.30
84 PKCYFLXARSA	5,762	\$ 63.17
85 FRSTFLXA63H	6,008	\$ 66.07
86 LKWLFLXERSA	3,932	\$ 68.30
87 BRJTFLXARSA	1,266	\$ 106.72
88 PRSHFLXARSA	4,208	\$ 131.22
89 INLKFLXARSA	1,592	\$ 132.01
90 MYCYFLXA32H	3,383	\$ 202.58

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Sprint Rate Banding Model - Recreated by QSI Consulting Populated with data for Hi Cap DS1 for Verizon - Weighting on Total Access Lines

	Column Numbers for Vertical Look Table (area shaded in bright yellow)								
1	2	3	4	5	6	7			
<u> </u>	 	<u> </u>	•	1		<u> </u>			

Rate			Total				T-4-1	D	
Band		Number of	Lines	Month	•		Total		t of Tota
ID	Rate Band	Wire Centers	Served	Cost			onthly Cost		nes
4.0	Rate Band 1	80	2,443,504	\$.	212.73	\$	51 <u>9,808,471</u>	80.38	98.26%
2	Rate Band 2	# 46°	32,842	\$	-263.03	\$	8,638,471	45.00	1.32%
. 3	Rate Band 3	2.	5,474	\$	336.83	\$	1,843,808		0.22%
4	Rate Band 4	2	4,975	\$	463.95	\$	2,308,148		0.20%
- 5	Rate Band 5	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		\$	450.	\$			0.00%
6 1	Rate Band 6	•		\$	11-	\$			0.00%
7.	Rate Band 7			4\$		-\$	200		0.00%
8**	Rate Band 8			\$ - 7.45		\$-			0:00%
9 -	Rate Band 9	9.00		\$	7.46	\$			0.00%
10	Rate Band 10			18	- 1	\$			0.00%
317	Rate Band 11			\$	-	\$.		a in the	0.00%
·412	Rate Band 12		100 200 200	\$		\$			0.00%
	Totals	90	2,486,795	\$	214.17	\$	532,598,893		100.00%

		USER INPUTS		•		
		Total			Percent of Total	Percentage
Refe		Lines	Monthly	Total	Lines in	Deviation from
islame:	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	TAMPFLXX22H	65,478	\$186.56	\$12,215,281.33	2.68%	-12.30%
	SARKFLXARSA	27,881	\$192.85	\$5,376,774.06	1.14%	-9.35%
	BHPKFLXA28H	51,245	\$193.93	\$9,937,850.39	2.10%	-8.84%
	SPBGFLXA89H	53,677	\$195.74	\$10,506,999.05	2.20%	-7.98%
h 12-21 of the 12-2 and 13-12-2	SRSTFLXA95H	13,697	\$198.93	\$2,724,719.28	0.56%	-6.49%
	ANMRFLXA77H	62,277	\$199:43	\$12,419,825.48	2.55%	-6.25%
The Mark Street Control of the Contr	GNDYFLXA57H	3,300	\$200.78	\$662,573.88	0.14%	-5.62%
	HYPKFLXADS0	25,379	\$201.61	\$5,116,669.99	1.04%	-5.23%
	WSSDFLXA87H	49,667	\$202.41	\$10,053,032.96	2.03%	-4.85%
	SEKYFLXA34H	19,313	\$202.70	\$3,914,825.45	0.79%	-4.71%
	LRGOFLXA58H	26,427	\$202.84	\$5,360,337.64	1.08%	-4.65%
	INRKFLXX59H	54,554	\$203.89	\$11,123,138.48	2.23%	-4.15%
	UNVRFLXA97H	17,342	\$204.02	\$3,538,140.20	0.71%	-4.09%
1	FHSDFLXA57H	63,066	\$204.13	\$12,873,681.57	2.58%	-4.04%
	SGBEFLXA36H	25,644	\$205.50	\$5,269,932.88	1.05%	-3.40%
	SPBGFLXS86H	41,905	\$205.64	\$8,617,295.04	1.71%	-3.33%
	SMNLFLXA23H	24,670	\$206.02	\$5,082,534.69	1.01%	-3.15%
1	VENCFLXA48H	56,373	\$206.14	\$11,620,475.37	2.31%	-3.10%
	CLWRFLXA44H	35,833	\$206.44	\$7,397,200.85	1.47%	-2.96%

	Total			Percent of Total	Percentage
1.1 1	Lines	Monthly	Total	Lines in	Deviation from
Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
DNDNFLXA73H	36,452	\$206.52	\$7,528,099.93	1.49%	-2.92%
TMTRFLXADS0	9,121	\$207.03	\$1,888,316.02	0.37%	-2.68%
BRTNFLXX74H	56,959	\$207.49	\$11,818,704.26	2.33%	-2.46%
SWTHFLXA88H	51,435	\$208.19	\$10,708,416.35	2.10%	-2.13%
SKWYFLXADS0	20,111	\$209.08	\$4,204,866.57	0.82%	-1.71%
SLSPFLXA93H	27,600	\$209.26	\$5,775,582.44	1.13%	-1.63%
PSDNFLXA34H	12,996	\$209.72	\$2,725,538.98	0.53%	-1.41%
BARTFLXA53H	35,927	\$210.02	\$7,545,213.17	1.47%	-1.28%
WLCRFLXA83H	37,895	\$210.58	\$7,979,956.11	1.55%	-1.01%
WNHNFLXC29H	36,708	\$210.80	\$7,738,123.61	1.50%	-0.91%
PNLSFLXA53H	53,845	\$211.17	\$11,370,337.51	2.20%	-0.73%
ENWDFLXA47H	20,455	\$211.94	\$4,335,143.67	0.84%	-0.37%
STGRFLXA78H	44,379	\$212.29	\$9,421,065.17	1.82%	-0.21%
BAYUFLXA54H	15,914	\$212.51	\$3,381,808.79	0.65%	-0.11%
PLSLFLXA79H	33,436	\$212.93	\$7,119,659.80	- 1.37%	0.10%
CNSDFLXA79H	23,757	\$213.15	\$5,063,835.72	0.97%	0.20%
NRSDFLXA35H	21,447	\$213.78	\$4,584,994.93	0.88%	0.49%
LKWLFLXA67H	44,128	\$214.08	\$9,446,790.00	1.81%	0.63%
YBCTFLXA24H	28,899	\$214.38	\$6,195,361.52	1.18%	0.78%
ABDLFLXA96H	57,974	\$214.42	\$12,430,790.62	2.37%	0.79%
LLMNFLXADS0	61,713	\$214.91	\$13,262,470.02	2.53%	1.02%
LKLDFLXA68H	52,371	\$214.92	\$11,255,702.50	2.14%	1.03%
SPRGFLXA37H	49,282	\$215.66	\$10,628,169.53	2.02%	1.38%
VENCFLXSDS0	59,910	\$215.90	\$12,934,373.37	2.45%	1.49%
SNSPFLXA37H	26,769	\$215.99	\$5,781,799.46	1.10%	1.53%
NGBHFLXA39H	24,694	\$216.14	\$5,337,387.67	1.01%	1.60%
TRSPFLXA93H	82,667	\$216.17	\$17,870,145.34	3.38%	1.62%
BRNDFLXA68H	30,294	\$216.38	\$6,555,061.94	1.24%	1.72%
SSDSFLXA92H	46,404	\$216.59	\$10,050,514.81	1.90%	1.81%
CRWDFLXA96H	45,652	\$217.34	\$9,921,842.91	1.87%	2.17%
NPRCFLXA84H	37,359	\$217.81	\$8,137,242.33	1.53%	2.39%
BRBAFLXA75H	36,174	\$217.91	\$7,882,623.26	1.48%	2.43%
OSPRFLXA96H	14,216	\$218.71	\$3,109,246.83	0.58%	2.81%
TAMPFLXEDS0	36,682	\$219.72	\$8,059,843.66	1.50%	
CYGRFLXA32H	18,635	\$220.22	\$4,103,845.16	0.76%	3.29%
OLDSFLXA85H	11,026	\$220.22 \$220.37			3.52%
HGLDFLXA64H			\$2,429,842.20	0.45%	3.59%
LUTZFLXA94H	15,075	\$220.80 \$222.45	\$3,328,519.07	0.62%	3.79%
EKLDFLXN85H	23,086 41,016		\$5,135,468.17	0.94%	4.57%
ZPHYFLXA78H		\$223.08	\$9,149,717.05	1.68%	4.86%
Prince and the second s	15,350	\$223.14	\$3,425,163.07	0.63%	4.89%
HDSNFLXA86H	34,588	\$223.17	\$7,718,992.18	1.42%	4.91%
HNCYFLXA42H	26,139	\$223.39	\$5,839,156.53	1.07%	5.01%
LGBKFLXA38H	20,386	\$223.83	\$4,563,067.92	0.83%	5.22%
BYSHFLXA84H	20,535	\$223.88	\$4,597,455.12	0.84%	5.24%
LKLDFLXE66H	16,639	\$223.96	\$3,726,399.75	0.68%	5.28%
LKALFLXA95H	13,117	\$226.70	\$2,973,631.56	0.54%	6.57%
RSKNFLXA64H	19,275	\$227.19	\$4,379,060.87	0.79%	6.80%
PTCYFLXA75H	30,084	\$227.78	\$6,852,392.86	1.23%	7.07%
MLBYFLXARSA	18,480	\$231.99	\$4,287,086.48	0.76%	9.05%
FRSTFLXA63H	18,533	\$236.07	\$4,375,107.58	0.76%	10.97%
WLCHFLXA97H	7,148	\$240.11	\$1,716,300.74	0.29%	12.87%
PLMTFLXA72H	33,749	\$240.50	\$8,116,534.89	1.38%	13.05%

		Total			Percent of Total	Percentage
		Lines	Monthly	Total	Lines in	Deviation from
25:17)0	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	MNLKFLXA85H	1,610	\$242.17	\$389,901.55	0.07%	13.84%
	THNTFLXADS0	2,237	\$244.23	\$546,345.31	0.09%	14.81%
	BBPKFLXARSA	8,649	\$246.44	\$2,131,494.09	0.35%	15.85%
	KYSTFLXA92H	17,293	\$247.14	\$4,273,741.05	0.71%	16.17%
	PRSHFLXARSA	10,596	\$248.39	\$2,631,937.48	0.43%	16.76%
	POINFLXARSA	13,085	\$249.43	\$3,263,847.47	0.54%	17.25%
	ALFAFLXA67H	3,326	\$249.89	\$831,141.66	0.14%	17.47%
10.7	NRPTFLXA42H	5,101	\$250.44	\$1,277,503.67	0.21%	17.73%
	WIMMFLXA63H	7,393	\$254.90	\$1,884,500.14	0.30%	19.82%
	HNCYFLXN424	9,377	\$258.78	\$2,426,565.80	28.55%	-1.62%
	DUNDFLXA43H	2,589	\$258.96	\$670,448.16	7.88%	-1.55%
) T = 1 = 1 = 1 = 1 = 1 = 1 = 1 = 1 = 1 =	PKCYFLXARSA	5,174	\$259.47	\$1,342,499.39	15.75%	-1.35%
	LNLKFLXA99H	5,762	\$263.43	\$1,517,901.40	17.54%	0.15%
	ALTRFLXARSA	6,008	\$264.75	\$1,590,618.93	18.29%	0.65%
	PNCRFLXA73J	3,932	\$277.32	\$1,090,437.08	11.97%	5.43%
	MYCYFLXA32H	1,266	\$329.22	\$416,794.15	23.13%	-2.26%
	LKWLFLXERSA	4,208	\$339.12	\$1,427,013.81	76.87%	0.68%
	BRJTFLXARSA	1,592	\$458.10	\$729,297.31	32.00%	-1.26%
	INLKFLXARSA	3,383	\$466.70	\$1,578,845.45	68.00%	0.59%
				\$0.00	#N/A	#N/A

\$0.00 \$0.00 0.00%

Docket 990649-TP Sprint Rate Banding Model - Recreated by QSI Consulting Populated with data for Hi Cap DS1 for Verizon - Weighting on Business Lines

	Column Numbers for Vertical Look Table (area shaded in bright yellow)									
1	2	3	4	5	6	7				
Rate Band ID	Rate Band	Number of Wire Centers	Total Lines Served	Monthly Cost	Total Monthly Cost	Percent of Total Lines				
1	Rate Band 1	. 79	766,011	\$209.73	\$160,656,807.15	98.51%				
. 2	Rate Band 2	7	9,684	\$260.39	\$2,521,598.93	1.25%				
3	Rate Band 3	4	1,884	\$399.43	\$752,527.80	0.24%				
4	Rate Band 4	- 0	-51	\$0.00	\$0.00	0.00%				
7 :5	Rate Band 5	- 0	-	\$0.00	\$0:00	0.00%				
- 6	Rate Band 6	0	44. 44.	\$0.00	\$0,00	0.00%				
7	Rate Band 7	0	•	\$0.00	\$0.00	0.00%				
- 8	Rate Band 8	0	- ₁₀ 83	\$0.00	\$0:00	0.00%				
9 .	Rate Band 9	. 0		\$0.00	\$0.00	0.00%				
10	Rate Band 10	0	- 23	\$0.00	\$0.00	0.00%				
4 11	Rate Band 11	0		\$0.00	\$0:00	0.00%				
					The second secon	A Constitution of Marine Call Constitution of the Constitution				

Totals	90	777,579	\$210.82	\$163,930,933.88	100.00%

	L	JSER INPUTS				
		Business			Percent of Total	Percentage
Pare		Lines	Monthly	Total	Lines in	Deviation from
[Semial	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
1	TAMPFLXX22H	57,715	\$186.56	\$10,767,050.95	7.53%	-11.05%
	SARKFLXARSA	1,221	\$192.85	\$235,466.49	0.16%	-8.05%
	BHPKFLXA28H	20,745	\$193.93	\$4,023,040.42	2.71%	-7.54%
	SPBGFLXA89H	25,071	\$195.74	\$4,907,520.41	3.27%	-6.67%
	SRSTFLXA95H	35,118	\$198.93	\$6,985,959.83	4.58%	-5.15%
	ANMRFLXA77H	1,656	\$199.43	\$330,254.04	0.22%	-4.91%
	GNDYFLXA57H	9,139	\$200.78	\$1,834,928.08	1.19%	-4.27%
	HYPKFLXADS0	9,292	\$201.61	\$1,873,363.71	1.21%	-3.87%
*	WSSDFLXA87H	31,045	\$202.41	\$6,283,778.13	4.05%	-3.49%
	SEKYFLXA34H	1,907	\$202.70	\$386,556.83	0.25%	-3.35%
	LRGOFLXA58H	10,892	\$202.84	\$2,209,285.87	1.42%	-3.29%
	INRKFLXX59H	3,653	\$203.89	\$744,818.43	0.48%	-2.78%
	UNVRFLXA97H	20,669	\$204.02	\$4,216,919.60	2.70%	-2.72%
	FHSDFLXA57H	12,701	\$204.13	\$2,592,658.95	1.66%	-2.67%
	SGBEFLXA36H	3,753	\$205.50	\$771,254.80	0.49%	-2.02%
	SPBGFLXS86H	3,254	\$205.64	\$669,148.74	0.42%	-1.95%
	SMNLFLXA23H	4,402	\$206.02	\$906,903.84	0.57%	-1.77%
	VENCFLXA48H	8,811	\$206.14	\$1,816,259.71	1.15%	-1.71%
	CLWRFLXA44H	31,307	\$206.44	\$6,462,874.08	4.09%	-1.57%

Rate Band 12

	Business			Percent of Total	Percentage
1.01	Lines	Monthly	Total	Lines in	Deviation from
Banal Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
DNDNFLXA73		\$206.52	\$1,133,799.75	0.72%	-1.53%
TMTRFLXADS		\$207.03	\$1,962,225.55	1.24%	-1.29%
BRTNFLXX74H		\$207.49	\$3,579,495.20	2.25%	-1.07%
SWTHFLXA88		\$208.19	\$4,339,370.51	2.72%	-0.73%
SKWYFLXADS		\$209.08	\$1,683,117.49	1.05%	-0.31%
SLSPFLXA93F		\$209.26	\$2,362,129.51	1.47%	-0.22%
PSDNFLXA34H		\$209.72	\$1,967,186.49	1.22%	0.00%
BARTFLXA53H	7,658	\$210.02	\$1,608,295.78	1.00%	0.14%
WLCRFLXA83	7,192	\$210.58	\$1,514,496.49	0.94%	0.40%
WNHNFLXC29	H 12,543	\$210.80	\$2,644,090.78	1.64%	0.51%
PNLSFLXA53F	19,334	\$211.17	\$4,082,720.87	2.52%	0.68%
ENWDFLXA47	H 4,564	\$211.94	\$967,274.30	0.60%	1.05%
STGRFLXA78F	11,060	\$212.29	\$2,347,889.34	1.44%	1.22%
BAYUFLXA54F		\$212.51	\$2,300,156.99	1.41%	1.32%
PLSLFLXA79H		\$212.93	\$1,086,814.92	0.67%	1.53%
CNSDFLXA79H		\$213.15	\$3,582,647.25	2.19%	1.63%
NRSDFLXA35H	8,223	\$213.78	\$1,757,934.13	1.07%	1.93%
LKWLFLXA67F	7,216	\$214.08	\$1,544,779.66	0.94%	2.07%
YBCTFLXA24F	10,532	\$214.38	\$2,257,847.94	1.37%	2.22%
ABDLFLXA96F	4,307	\$214.42	\$923,507.35	0.56%	2.24%
LLMNFLXADS		\$214.91	\$1,800,479.22	1.09%	2.47%
LKLDFLXA68H		\$214.92	\$4,339,928.60	2.64%	2.47%
SPRGFLXA37H		\$215.66	\$1,966,390.36	1.19%	2.83%
VENCFLXSDS		\$215.90	\$872,222.81	0.53%	2.94%
SNSPFLXA37H		\$215.99	\$582,953.29	0.35%	2.98%
NGBHFLXA39H		\$216.14	\$2,004,276.18	1.21%	3.06%
TRSPFLXA93H		\$216.17	\$1,940,992.60	1.17%	3.07%
BRNDFLXA68H		\$216.38	\$3,683,246.33	2.22%	3.17%
SSDSFLXA92H		\$216.59	\$3,019,009.70	1.82%	3.27%
CRWDFLXA96		\$217.34	\$3,189,412.18	1.92%	3.63%
NPRCFLXA84H		\$217.81	\$3,832,186.13	2.30%	3.85%
BRBAFLXA75H		\$217.91	\$2,773,975.62	1.66%	3.90%
OSPRFLXA96H		\$218.71	\$399,591.58	0.24%	4.28%
TAMPFLXEDS		\$219.72	\$6,429,286.45	3.82%	4.76%
CYGRFLXA32F		\$220.22	\$430,094.42	0.25%	5.00%
OLDSFLXA85H		\$220.37	\$1,312,326.35	0.78%	5.07%
HGLDFLXA64F		\$220.80	\$2,048,115.62	1.21%	5.28%
LUTZFLXA94H		\$222.45	\$807,046.63	0.47%	6.06%
LKLDFLXN85H		\$223.08	\$1,039,537.78	0.61%	6.36%
ZPHYFLXA78H		\$223.14	\$1,498,146.24	0.88%	6.39%
HDSNFLXA86H		\$223.17	\$1,761,478.12	1.03%	6.41%
HNCYFLXA42H		\$223.39	\$1,177,481.70	0.69%	6.51%
LGBKFLXA38H		\$223.83	\$536,081.02	0.31%	6.72%
BYSHFLXA84H		\$223.88	\$131,867.60	0.08%	6.75%
LKLDFLXE66H	9,901	\$223.96	\$2,217,385.89	1.29%	6.78%
LKALFLXA95H	804	\$226.70	\$182,267.27	0.10%	8.09%
RSKNFLXA64H		\$227.19	\$541,390.51	0.31%	8.32%
PTCYFLXA75H		\$227.78	\$2,159,537.85	1.24%	8.60%
MLBYFLXARSA		\$231.99	\$397,158.66	0.22%	10.61%
FRSTFLXA63H		\$236.07	\$266,760.46	0.15%	12.56%
WLCHFLXA97H		\$240.11	\$647,814.69	0.35%	14.48%
PLMTFLXA72H	5,670	\$240.50	\$1,363,618.27	0.74%	14.67%

	<u> </u>	Business			Percent of Total	Percentage
Perite.		Lines	Monthly	Total	Lines in	Deviation from
Elegana!	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
7.1512.	MNLKFLXA85H	1,131	\$242.17	\$273,899.79	0.15%	15.47%
	THNTFLXADS0	1,178	\$244.23	\$287,704.42	0.15%	16.45%
	BBPKFLXARSA	831	\$246.44	\$204,794.96	0.11%	17.50%
	KYSTFLXA92H	3,184	\$247.14	\$786,884.38	0.42%	17.83%
	PRSHFLXARSA	650	\$248.39	\$161,453.32	0.08%	18.43%
	POINFLXARSA	201	\$249.43	\$50,136.29	0.03%	18.93%
و بد می دارد دارد	ALFAFLXA67H	3,662	\$249.89	\$915,105.46	0.48%	19.15%
	NRPTFLXA42H	3,837	\$250.44	\$960,945.22	0.50%	19.41%
	WIMMFLXA63H	2,800	\$254.90	\$713,729.26	28.91%	-2.11%
	HNCYFLXN424	1,459	\$258.78	\$377,557.80	15.07%	-0.62%
6 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	DUNDFLXA43H	1,350	\$258.96	\$349,596.37	13.94%	-0.55%
3/	PKCYFLXARSA	921	\$259.47	\$238,972.16	9.51%	-0.35%
	LNLKFLXA99H	2,114	\$263.43	\$556,897.53	21.83%	1.17%
*2	ALTRFLXARSA	284	\$264.75	\$75,189.04	2.93%	1.68%
2	PNCRFLXA73J	756	\$277.32	\$209,656.77	7.81%	- 6.50%
1	MYCYFLXA32H	566	\$329.22	\$186,339.25	30.04%	-17.58%
	LKWLFLXERSA	335	\$339.12	\$113,604.95	17.78%	-15.10%
3}	BRJTFLXARSA	719	\$458.10	\$329,374.85	38.16%	14.69%
3	INLKFLXARSA	264	\$466.70	\$123,208.75	14.01%	16.84%
				\$0.00	#N/A	#N/A
				\$0.00	#N/A	#N/A
				\$0.00	#N/A	#N/A
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				\$0.00	#N/A	#N/A
				\$0.00	#N/A	#N/A
				\$0.00	#N/A	#N/A
L. Le la				\$0.00	#N/A	#N/A
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Comment of the second				\$0.00	#N/A	#N/A
				\$0.00	#N/A	#N/A
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vector to about the area and				\$0.00	#N/A	#N/A
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المستعدد الأساد الدائد المستعدد				\$0.00	#N/A	#N/A
And State of Land				\$0.00	#N/A	#N/A

	Business			Percent of Total	Percentage
836	Lines	Monthly	Total	Lines in	Deviation from
Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
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			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
###			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
	Taxaya o Carana		\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
			\$0.00	#N/A	#N/A
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		Business Lines	n sagara da Ayusa Tangara	ngga galawagalah Maranasa kacamatan
AWG NAME	CILIDADA -	(Malimoth)	CO14 40	#044.40
AUBURNDALE	ABDLFLXA96H	4307	\$214.42	\$914.42 \$1.136.04
ALAFIA	ALFAFLXA67H	284	\$249.89 \$264.75	\$1,136.04 \$1,095.86
ALTURAS	ALTRFLXARSA		\$264.75 \$199.43	\$855.45
ANNA MARIA	ANMRFLXA77H	1656	· ·	
BARTOW MAIN	BARTFLXA53H	7658	\$210.02 \$212.51	\$872.61
BAYOU	BAYUFLXA54H	#0 8 [2]4	\$212.51	\$950.71
BABSON PARK	BBPKFLXARSA	381	\$246.44 \$403.03	\$1,054.39
BEACH PARK	BHPKFLXA28H	20745	\$193.93 \$217.91	\$816.61
BRADENTON BAY	BRBAFLXA75H	1/27/ 3(0)	·	\$1,027.05
BRADLEY	BRJTFLXARSA	7:19	\$458.10	\$1,092.26
BRANDON	BRNDFLXA68H	17.022 17.022	\$216.38	\$996.75
BRADENTON MAIN	BRTNFLXX74H	1725	\$207.49	\$923.06
BAYSHORE	BYSHFLXA84H	589	\$223.88	\$903.20
CLEARWATER	CLWRFLXA44H	31307	\$206.44	\$924.38 \$986.13
COUNTRYSIDE	CNSDFLXA79H	16808	\$213.15	
CARROLLWOOD	CRWDFLXA96H		\$217.34	\$996.21
CYPRESS GARDENS	CYGRFLXA32H	1953	\$220.22	\$956.06
DUNEDIN	DNDNFLXA73H	5/90	\$206.52	\$901.73
DUNDEE	DUNDFLXA43H	1350	\$258.96	\$1,000.25
ENGLEWOOD	ENWDFLXA47H	4564	\$211.94	\$925.47
FEATHER SOUND	FHSDFLXA57H	127/01	\$204.13	\$883.76
FROSTPROOF	FRSTFLXA63H	1/130	\$236.07	\$868.43
GANDY	GNDYFLXA57H	9139	\$200.78	\$839.16
HUDSON	HDSNFLXA86H	8 6 6 7 6 6 7 6 6 7 6 7 6 7 6 7 6 7 6 7	\$223.17	\$1,022.90
HIGHLANDS	HGLDFLXA64H	9276	\$220.80	\$1,006.36
HAINES CITY MAIN	HNCYFLXA42H	5271	\$223.39	\$953.99
HAINES CITY NORTH	HNCYFLXN424	12459	\$258.78	\$1,272.64
HYDE PARK	HYPKFLXADS0	9292	\$201.61	\$875.43
INDIAN LAKE	INLKFLXARSA	264	\$466.70	\$1,340.46
INDIAN ROCKS	INRKFLXX59H	36/58	\$203.89	\$900.35
KEYSTONE	KYSTFLXA92H	3 <u>8</u>	\$247.14	\$1,151.61
LONGBOAT	LGBKFLXA38H	2395	\$223.83	\$1,046.99
LAKE ALFRED	LKALFLXA95H	15/0/8)	\$226.70	\$876.65
LAKELAND MAIN	LKLDFLXA68H	20196	\$214.92	\$973.20
LAKELAND EAST	LKLDFLXE66H	i i i i i i i i i i i i i i i i i i i	\$223.96	\$1,025.02
LAKELAND NORTH	LKLDFLXN85H	4(660)	\$223.08	\$997.94
LAKE WALES MAIN	LKWLFLXA67H	7216	\$214.08	\$889.40
LAKE WALES EAST	LKWLFLXERSA	385	\$339.12	\$1,199.24
LEALMAN	LLMNFLXADS0	ia) (17/18)	\$214.91	\$973.14
LAND O' LAKES	LNLKFLXA99H	2114	\$263.43	\$1,142.23
LARGO	LRGOFLXA58H	(0)3E)2	\$202.84	\$896.13
LUTZ	LUTZFLXA94H	3152 3	\$222.45	\$1,018.00
MULBERRY	MLBYFLXARSA	1712	\$231.99	\$925.80
MOON LAKE	MNLKFLXA85H	11131	\$242.17	\$1,097.29
MYAKKA CITY	MYCYFLXA32H	(ଅର୍ଟି)	\$329.22	\$1,278.83

NORTH GULF BEACH	NGBHFLXA39H		9)27/3)°	\$216.14	FP\$COEAhlbit	
NEW PORT RICHEY	NPRCFLXA84H		47/5 9/ 4	\$217.81	\$1,013.20	
NORTHPORT	NRPTFLXA42H		3637	\$250.44	\$970.49	
NORTHSIDE	NRSDFLXA35H		8/2/28/	\$213.78	\$961.21	
OLDSMAR	OLDSFLXA85H		5/9/5/5	\$220.37	\$978.56	
OSPREY	OSPRFLXA96H		1/89277	\$218.71	\$960.04	
POLK CITY	PKCYFLXARSA		9)2 1 F	\$259.47	\$969.22	
PALMETTO	PLMTFLXA72H		15(6)7/0)	\$240.50	\$1,125.47	
PALMA SOLA	PLSLFLXA79H		51/04	\$212.93	\$959.15	
PINECREST	PNCRFLXA73J		√5 6	\$277.32	\$1,167.19	
PINELLAS	PNLSFLXA53H		1,9,8,6,4	\$211.17	\$956.41	
POINCIANA	POINFLXARSA	5	201	\$249.43	\$870.13	
PARRISH	PRSHFLXARSA		650	\$248.39	\$1,106.47	
PASADENA	PSDNFLXA34H		9330	\$209.72	\$942.16	
PLANT CITY	PTCYFLXA75H		9/4/8/1	\$227.78	\$1,017.99	
RUSKIN	RSKNFLXA64H		2386	\$227.19	\$1,024.65	
ST. ARMANDS KEY	SARKFLXARSA		1/2/2/1	\$192.85	\$787.00	
SIESTA KEY	SEKYFLXA34H		1907	\$202.70	\$886.89	
SOUTH GULF BEACH	SGBEFLXA36H		37/53	\$205.50	\$914.06	
SKYWAY	SKWYFLXADS0		8(050)	\$209.08	\$912.43	
SULPHUR SPRINGS	SLSPFLXA93H		11/288	\$209.26	\$925.69	
SEMINOLE	SMNLFLXA23H		44,62	\$206.02	\$889.25	
SEVEN SPRINGS	SNSPFLXA37H		2(69.9)	\$215.99	\$941.16	
ST. PETERSBURG MAIN	SPBGFLXA89H		25071	\$195.74	\$847.48	
ST. PETERSBURG SOUTH	SPBGFLXS86H		3254	\$205.64	\$907.03	
SARASOTA SPRINGS	SPRGFLXA37H		9/1/18	\$215.66	\$970.07	
SARASOTA MAIN	SRSTFLXA95H		35118	\$198.93	\$870.58	
SOUTHSIDE	SSDSFLXA92H		(889)	\$216.59	\$1,003.26	
ST. GEORGE	STGRFLXA78H		41060	\$212.29	\$955.19	
SWEETWATER *	SWTHFLXA88H		20848	\$208.19	\$937.74	
TAMPA EAST	TAMPFLXEDS0		29261	\$219.72	\$1,023.62	
TAMPA MAIN	TAMPFLXX22H		(57/7/1/5)	\$186.56	\$791.37	
THONOTOSASSA	THNTFLXADS0		1/17/8	\$244.23	\$1,048.48	
TEMPLE TERRACE	TMTRFLXADS0		947/8	\$207.03	\$915.32	
TARPON SPRINGS	TRSPFLXA93H		8979	\$216.17	\$986.29	
UNIVERSITY	UNVRFLXA97H		20669	\$204.02	\$909.33	
VENICE MAIN	VENCFLXA48H		8811	\$206.14	\$901.88	
VENICE SOUTH	VENCFLXSDS0		450/410)	\$215.90	\$972.25	
WIMAUMA ,	WIMMFLXA63H		2 : (00)	\$254.90	\$1,118.17	
WESLEY CHAPEL	WLCHFLXA97H		2698	\$240.11	\$1,116.37	
WALLCRAFT	WLCRFLXA83H		7/192	\$210.58	\$939.49	
WINTER HAVEN	WNHNFLXC29H		1,2346	\$210.80	\$933.88	
WESTSIDE	WSSDFLXA87H		31045	\$202.41	\$887.91	
YBOR CITY	YBCTFLXA24H		1/0/5/5/2	\$214.38	\$944.16	
ZEPHYR HILLS	ZPHYFLXA78H		67/14	\$223.14	\$1,006.63	
Florida Average	Florida Average	The state of the s	777579	\$210.82	\$935.97	

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(from Fiber/Loop template)	CO7.45
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\$03.99 \$119.45	\$49.63
\$179.43 \$156.42	\$48.73
\$184.08	\$52.06
\$165.96	\$55.55
\$146.46	\$61.10
\$189.89	\$57.18
\$204.83	\$56.95
\$203.61	\$57.76
\$214.68	\$56.59
\$219.74	\$58.24
\$230.49	\$57.10
\$199.86	\$61.39
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\$227.72	\$61.01
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\$266.60	\$66.72
\$259.89	\$68.09
\$286.86	\$65.33
\$249.81	\$71.91
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Docket No. 990649B-TP Rebuttal Testimony of Warren R. Fischer Exhibit WRF-4

\$322.65	\$71.57	1(\$)2(0)\$)912.650	8855912.85
\$335.17	\$70.38	\$\f6\}\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
\$342.96	\$69.80	3(0)(9)0(09) 7(0	139843333,25
\$334.52	\$72.56	31/36/4/2/12	1/461(968)2,7/9)
\$354.87	\$70.91	36132461543	177 8/2 6/2/211 <u>2</u> /5
\$371.46	\$68.93	27/7/3/97/5/6/2	
\$291.21	\$81.31	3(00)501 56	47/588987 86
\$367.35	\$73.45	6/2929545	24995)24552226
\$286.44	\$85.25	.4(3)(0(0)4).4(2	185718578
\$313.38	\$82.02	18:2328.35	5181277 310191.277
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\$369.02	\$82.52	2/2/17/8/8/5 3 / 9	,这是 _我 我说了,我们就是一个人,我是我们就是一个人的,我们就会没有一个人的,我们就是这个人的,我们就是我们是
\$191.35	\$112.04	[[6]27 <u>2</u> [6]7,727(
\$368.58	\$89.67	524(690)5 ₍₁	
\$360.60	\$92.02	21459687 85	
\$250.21	\$115.85	307/156166	
\$181.51	\$133.90	A66/60)46	
\$478.41	\$103.50	(5217/8) (41/6)	
\$489.31	\$102.91	1/3/63/6/18/ <i>227</i>	
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\$397.11	\$123.30	248777703412452	
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\$665.55	\$119.72	37, 7/5/577 SIG) 1856782.06
\$339.36	\$163.25	3/49/5/216. 37	
\$302.21	\$169.28	238972 43	
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\$539.27	\$177.11	2019(c)516), 7	
\$672.96	\$273.30	ୀ ଧ ର (ଜି.୧୯) 21	
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\$746.76	\$565.19 \$67.80	123/2031//	

\$67.80 163930933.88 727791290.22

Sprint Rate Banding Model - Recreated by QSI Consulting Populated with data for Hi Cap DS1 for Verizon - Weighting on Total Access Lines (COLLAPSED TO THREE ZONES)

L,		Column Num	bers for Ver	tical Look T	able (area shadeo	d in bright yell	ow)
Γ	1	2	3	4	5	6	7

Rate Band	Deta Band	Number of	Total Lines		Monthly Cost		Total Monthly Cost		nt of Tota ines
ID .	Rate Band	Wire Centers	Served	1000				L L	
1371	Rate Band 1	80	2,443,504	\$	212.73	\$	519,808,471		98,26%
2.4	Rate Band 2	6	32,842	\$	263.03	\$	8,638,471	4000	1.32%
3	Rate Band 3	4	10,449	\$	397.35	\$	4,151,951		0.42%
4 ***	Rate Band 4	4-7-	control per include a	\$		\$			0.00%
5	Rate Band 5		ing and the second	\$		\$	3-46-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-		0.00%
- 7.6	Rate Band 6		1. 177.045	\$		\$.	kasa sa		0.00%
7	Rate Band 7	. ·	·	\$	54.5 . 50.00	\$		7.55.40	0.00%
- 8	Rate Band 8	-		*\$		\$			0.00%
. 9	Rate Band 9	-		\$	1	-\$-	-		0.00%
10	Rate Band 10		:	\$		\$	David F		0.00%
11	Rate Band 11	- ·	-1	\$		\$	i de A	a. v r	0.00%
12	Rate Band 12			\$	- 10 miles (10	\$			0.00%
	Totals	90	2,486,795	\$	214.17	\$	532,598,893		100.00%

	14 .	USER INPUTS		•		
		Total			Percent of Total	Percentage
ांका	,	Lines	Monthly	Total	Lines in	Deviation from
Steleto	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	TAMPFLXX22H	65,478	\$186.56	\$12,215,281.33	2.68%	-12.30%
	SARKFLXARSA	27,881	\$192.85	\$5,376,774.06	1.14%	-9.35%
	BHPKFLXA28H	51,245	\$193.93	\$9,937,850.39	2.10%	-8.84%
	SPBGFLXA89H	53,677	\$195.74	\$10,506,999.05	2.20%	-7.98%
	SRSTFLXA95H	13,697	\$198.93	\$2,724,719.28	0.56%	-6.49%
	ANMRFLXA77H	62,277	\$199.43	\$12,419,825.48	2.55%	-6.25%
	GNDYFLXA57H	3,300	\$200.78	\$662,573.88	0.14%	-5.62%
	HYPKFLXADS0	25,379	\$201.61	\$5,116,669.99	1.04%	-5.23%
	WSSDFLXA87H	49,667	\$202.41	\$10,053,032.96	2.03%	-4.85%
	SEKYFLXA34H	19,313	\$202.70	\$3,914,825.45	0.79%	-4.71%
	LRGOFLXA58H	26,427	\$202.84	\$5,360,337.64	1.08%	-4.65%
	INRKFLXX59H	54,554	\$203.89	\$11,123,138.48	2.23%	-4.15%
	UNVRFLXA97H	17,342	\$204.02	\$3,538,140.20	0.71%	-4.09%
	FHSDFLXA57H	63,066	\$204.13	\$12,873,681.57	2.58%	-4.04%
7.5	SGBEFLXA36H	25,644	\$205.50	\$5,269,932.88	1.05%	-3.40%
	SPBGFLXS86H	41,905	\$205.64	\$8,617,295.04	1.71%	-3.33%
	SMNLFLXA23H	24,670	\$206.02	\$5,082,534.69	1.01%	-3.15%
	VENCFLXA48H	56,373	\$206.14	\$11,620,475.37	2.31%	-3.10%
	CLWRFLXA44H	35,833	\$206.44	\$7,397,200.85	1.47%	-2.96%

Total Clast	ERRORT MAIL ARTHUR		T-4-1			Percent of Total	Porcontago
Service Service Cost Monthly Cost Rate Band Average DNDNFLXA73H 34.62 \$20.65.5 \$7.52.8 (199.93 1.49% -2.92% TMTRFLXADS0 9.121 \$207.03 \$1.886.316.02 0.37% -2.68% BRTNFLXX74H \$56.999 \$207.49 \$11.816,704.26 2.33% -2.46% SWTHELXABBH 51.435 \$208.19 \$10,708.416.35 2.10% -2.13% SWTHELXABBH 51.435 \$208.19 \$10,708.416.35 2.10% -2.13% SWTHELXABDS 20.111 \$209.08 \$4.204.966.57 0.82% -1.71% SWTHELXABDS 27.600 \$299.26 \$5.775.582.44 1.13% -1.63% PSONFLXA34H 12,996 \$299.72 \$2.725.538.98 0.53% -1.41% -1.63% PSONFLXA34H 12,996 \$210.80 \$7.739.152.41 1.13% -1.63% -1.14% -1.28% WILCRFLXAB3H 37.895 \$210.59 \$7.799.956.11 1.55% -1.01% WINTRFLXC29H 36.708 \$210.80 \$7.739.123.61 1.55% -0.91% PNLSFLXA53H 53,845 \$211.17 \$11.370.337.51 2.20% -0.73% PNLSFLXA53H 53,845 \$211.17 \$11.370.337.51 2.20% -0.73% PNLSFLXA54H 44,379 \$212.29 \$4.21.055.17 0.84% -0.37% PLELFLXA79H 34,339 \$212.29 \$4.21.055.17 0.84% -0.37% PLELFLXA79H 23,757 \$213.15 \$5.063.835.72 0.97% 0.20% NRSDFLXA35H 15,914 \$212.29 \$9.42.1055.17 0.88% -0.11% PLELFLXA79H 23,757 \$213.15 \$5.063.835.72 0.97% 0.20% NRSDFLXA35H 24,142 \$213.76 \$4.969.99.30 1.81% 0.33% PREFIXAR39H 23,757 \$213.15 \$5.063.835.72 0.97% 0.20% NRSDFLXA35H 24,447 2213.76 \$4.969.99.30 1.81% 0.03% PREFIXAR39H 23,757 \$213.15 \$5.063.835.72 0.97% 0.20% NRSDFLXA35H 24,447 2213.76 \$4.969.99.30 1.81% 0.33% PREFIXAR39H 24,649 \$214.42 \$214.09 \$9.446.790.00 1.81% 0.33% PREFIXAR39H 24,649 \$214.42 \$12.430.790.62 2.37% 0.20% NRSDFLXA35H 24,440 \$9.446.790.00 1.81% 0.33% PREFIXAR39H 24,669 \$214.39 \$6.956.06.15 2.13% 0.79% 0.20% NRSDFLXA36H 32.21.19 \$3.12.62.470.02 2.53% 0.79% 0.20% NRSDFLXA36H 32.21.19 32.21.20 32.21.20 32.23% 0.23% 0.23% 0.23% 0.23% 0.23% 0.23%			Total	A d = - Ab-l	Taial	f .	Percentage
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PLMTFLXA72H 33,749 \$240.50 \$8,116,534.89 1.38% 13.05%	Control of the contro						
	PLM	TFLXA72H	33,749	\$240.50	\$8,116,534.89	1.38%	13.05%

		Total			Percent of Total	Percentage
Feet E		Lines	Monthly	Total	Lines in	Deviation from
12571.6	Wire Center	Served	Cost	Monthly Cost	Rate Band	Average
	MNLKFLXA85H	1,610	\$242.17	\$389,901.55	0.07%	13.84%
	THNTFLXADS0	2,237	\$244.23	\$546,345.31	0.09%	14.81%
	BBPKFLXARSA	8,649	\$246.44	\$2,131,494.09	0.35%	15.85%
Contract to the contract of th	KYSTFLXA92H	17,293	\$247.14	\$4,273,741.05	0.71%	16.17%
	PRSHFLXARSA	10,596	\$248.39	\$2,631,937.48	0.43%	16.76%
	POINFLXARSA	13,085	\$249.43	\$3,263,847.47	0.54%	17.25%
	ALFAFLXA67H	3,326	\$249.89	\$831,141.66	0.14%	17.47%
	NRPTFLXA42H	5,101	\$250.44	\$1,277,503.67	0.21%	17.73%
	WIMMFLXA63H	7,393	\$254.90	\$1,884,500.14	0.30%	19.82%
	HNCYFLXN424	9,377	\$258.78	\$2,426,565.80	28.55%	-1.62%
	DUNDFLXA43H	2,589	\$258.96	\$670,448.16	7.88%	-1.55%
	PKCYFLXARSA	5,174	\$259.47	\$1,342,499.39	15.75%	-1.35%
	LNLKFLXA99H	5,762	\$263.43	\$1,517,901.40	17.54%	0.15%
2	ALTRFLXARSA	6,008	\$264.75	\$1,590,618.93	18.29%	0.65%
	PNCRFLXA73J	3,932	\$277.32	\$1,090,437.08	11.97%	5.43%
	MYCYFLXA32H	1,266	\$329.22	\$416,794.15	12.12%	-17.15%
	LKWLFLXERSA	4,208	\$339.12	\$1,427,013.81	40.27%	-14.66%
	BRJTFLXARSA	1,592	\$458.10	\$729,297.31	15.24%	15.29%
	INLKFLXARSA	3,383	\$466.70	\$1,578,845.45	32.38%	17.45%
	1851 1851 1871			\$0.00	#N/A	#N/A

	ssatines alem):	no. Nation
AUBURNDALE ABDLFLXA96H		\$914.42
ALAFIA ALFAFLXA67H		1,136.04
ALTURAS ALTRELXARSA	A PART OF THE PART	,095.86
ANNA MARIA ANMRELXA77H		\$855.45
BARTOW MAIN BARTFLXA53H		\$872.61
BAYOU BAYUFLXA54H		\$950.71
BABSON PARK BBPKFLXARSA		,054.39
BEACH PARK BHPKFLXA28H		\$816.61
BRADENTON BAY BRBAFLXA75H		1,027.05
BRADLEY BRJTFLXARSA		,027.00
BRANDON BRNDFLXA68H		\$996.75
BRADENTON MAIN BRTNFLXX74H		\$923.06
BAYSHORE BYSHFLXA84H		\$903.20
		\$924.38
		\$986.13
COUNTRYSIDE CNSDFLXA79H CRWDFLXA96H		\$996.21
CYPRESS GARDENS CYGRFLXA32H		\$956.06
DUNEDIN DNDNFLXA73H		\$901.73
DUNDEE DUNDFLXA43H		1,000.25
ENGLEWOOD ENWDFLXA47H		\$925.47
FEATHER SOUND FHSDFLXA57H		\$883.76
FROSTPROOF FRSTFLXA63H		\$868.43
GANDY GNDYFLXA57H		\$839.16
HUDSON HDSNFLXA86H		,022.90
HIGHLANDS HGLDFLXA64H	机体的现在分词 电电子数据	1,006.36
HAINES CITY MAIN HNCYFLXA42H		\$953.99
HAINES CITY NORTH HNCYFLXN424		1,272.64
HYDE PARK HYPKFLXADS0		\$875.43
INDIAN LAKE INLKFLXARSA		1,340.46
INDIAN ROCKS INRKFLXX59H		\$900.35
KEYSTONE KYSTFLXA92H		1,151.61
LONGBOAT LGBKFLXA38H		1,046.99
LAKE ALFRED LKALFLXA95H		\$876.65
LAKELAND MAIN LKLDFLXA68H		\$973.20
LAKELAND EAST LKLDFLXE66H	Se 3 transcript 12 february 2014	1,025.02
LAKELAND NORTH LKLDFLXN85H	466 0 \$223.08	\$997.94
LAKE WALES MAIN LKWLFLXA67H	3/2/16 \$214.08	\$889.40
LAKE WALES EAST LKWLFLXERSA		1,199.24
LEALMAN LLMNFLXADS0		\$973.14
LAND O' LAKES LNLKFLXA99H		1,142.23
LARGO LRGOFLXA58H	\$202.84	\$896.13
LUTZ LUTZFLXA94H	\$222.45 \$222.45 \$	1,018.00
MULBERRY MLBYFLXARSA	\$231.99	\$925.80
MOON LAKE MNLKFLXA85H	\$242.17 \$	1,097.29
MYAKKA CITY MYCYFLXA32H		1,278.83

NORTH GULF BEACH	NGBHFLXA39H	927	\$216.14	FP\$C@Ahlbit
NEW PORT RICHEY	NPRCFLXA84H	17/5	\$217.81	\$1,013.20
NORTHPORT	NRPTFLXA42H	38	7 \$250.44	\$970.49
NORTHSIDE	NRSDFLXA35H	8/2/	3 \$213.78	\$961.21
OLDSMAR	OLDSFLXA85H	590	5 \$220.37	\$978.56
OSPREY	OSPRFLXA96H		\$218.71	\$960.04
POLK CITY	PKCYFLXARSA	(9)	\$259.47	\$969.22
PALMETTO	PLMTFLXA72H	១វិតិ	\$240.50	\$1,125.47
PALMA SOLA	PLSLFLXA79H	31/(4 \$212.93	\$959.15
PINECREST	PNCRFLXA73J	7	6 \$277.32	\$1,167.19
PINELLAS	PNLSFLXA53H	193	\$211.17	\$956.41
POINCIANA	POINFLXARSA	2(\$249.43	\$870.13
PARRISH	PRSHFLXARSA	: a	\$248.39	\$1,106.47
PASADENA	PSDNFLXA34H	936	\$209.72	
PLANT CITY	PTCYFLXA75H	(9)/\{	\$227.78	· · · · · · · · · · · · · · · · · · ·
RUSKIN	RSKNFLXA64H	250		
ST. ARMANDS KEY	SARKFLXARSA	r 12		\$787.00
SIESTA KEY	SEKYFLXA34H	19		
SOUTH GULF BEACH	SGBEFLXA36H	37/		\$914.06
SKYWAY	SKWYFLXADS0	80		
SULPHUR SPRINGS	SLSPFLXA93H	112	8800 X	
SEMINOLE	SMNLFLXA23H	2M4	000 7-0010	
SEVEN SPRINGS	SNSPFLXA37H	26		•
ST. PETERSBURG MAIN	SPBGFLXA89H	250		•
ST. PETERSBURG SOUTH	SPBGFLXS86H			
SARASOTA SPRINGS	SPRGFLXA37H	. 91		
SARASOTA MAIN	SRSTFLXA95H	44 P. 44 8/5/1		
SOUTHSIDE	SSDSFLXA92H	1309)		•
ST. GEORGE	STGRFLXA78H	inlo		
SWEETWATER	SWTHFLXA88H	20/3/	888888	
TAMPA EAST	TAMPFLXEDS0	. 292	EE 20	•
TAMPA MAIN	TAMPFLXX22H	577		
THONOTOSASSA	THNTFLXADS0	11		•
TEMPLE TERRACE	TMTRFLXADS0	9/4		
TARPON SPRINGS	TRSPFLXA93H	(9)9	7 9 \$216.17	
UNIVERSITY	UNVRFLXA97H	200	9 \$204.02	
VENICE MAIN	VENCFLXA48H	88	\$206.14	
VENICE SOUTH	VENCFLXSDS0	∑1(0)		
WIMAUMA	WIMMFLXA63H	28	69668551	
WESLEY CHAPEL	WLCHFLXA97H	26		•
WALLCRAFT	WLCRFLXA83H	70	ECH COLOR	·
WINTER HAVEN	WNHNFLXC29H	1/2/5	69893	
WESTSIDE	WSSDFLXA87H	310	2022203	
YBOR CITY	YBCTFLXA24H	1.05		·
ZEPHYR HILLS	ZPHYFLXA78H	67	43949	
Florida Average	Florida Average	7775	79 \$210.82	\$935.97

Floer Loop G		Metallic DS1 Cost
(from/Fiber Loop i		
	\$236.58	\$79.11
	\$501.96	\$121.85
	\$453.86 \$465.06	\$160.81
	\$165.96 \$186.51	\$55.55 \$76.06
	\$280.03	\$76.06 \$69.16
	\$404.19	\$127.21
	\$119.45	\$49.63
	\$371.46	\$68.93
	\$449.54	\$585.62
	\$335.17	\$70.38
	\$246.93	\$62.55
	\$223.15	\$101.65
	\$248.51	\$60.01
	\$322.45	\$64.97
	\$334.52	\$72.56
	\$286.44	\$85.25
	\$221.38	\$63.79
	\$339.36	\$163.25
•	\$249.81	\$71.91 \$24.80
	\$199.86 \$181.51	\$61.39 \$133.90
	\$161.51 \$146.46	\$133.90 \$61.10
	\$366.48	\$81.13
	\$346.67	\$78.55
-	\$283.97	\$92.52
	\$665.55	\$119.72
	\$189.89	\$57.18
	\$746.76	\$565.19
	\$219.74	\$58.24
	\$520.62	\$113.34
	\$395.34	\$78.78
	\$191.35	\$112.04
	\$306.97	\$70.91
	\$369.02	\$82.52
	\$336.60 \$206.61	\$84.88
	\$200.01 \$577.65	\$82.32 \$307.62
	\$306.90	\$70.88
	\$509.39	\$150.58
	\$214.68	\$56.59
	\$360.62	\$80.33
	\$250.21	\$115.85
	\$455.56	\$111.06
	\$672.96	\$273.30

US1	WEIGHTING	DS3 WEIGHTING
	92350735	3938405.45
	915105.46	4160168382
1	75189.04.	3111225.39
	380254 04	1416618.97
	-1608295.78	668246238
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	27/7397/5 62	1/3/07/4/3889.0)7
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	3686246.33	13966342.84
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	6)4(6),2(8),7(4),(0)8	2 ::939579 ,54
	3682647.25	16574861.67
	3189412 18	14619332.76
41 - 11 A	43009442	1867186.7
	1133799.75	493047542
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	246 67/60.46	981/3926. 572
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	17/61/47/8 1/2	\$(0)737/28/3 <u>}</u> 9
	20481115.62	9334950.02
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	37.7/5/57/,30	1856782.06
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	45389928160)	1935179074
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	14039537,778	2 (6 650)2 (0)11-748
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100	556897,53	2441446681-54
	2209285.87	97/6(0)a;3(3),2;
	(3)0)7/0/4(5) (5)3	3 19(8(3)4(10), 67
	307073088 30745866	11 53497 /5. 17
	2,73;19(9),7(9)	1/24/110333,113
		7/288166,47/

Docket No. 990469B-TP Rebuttal Testimony of Warren R. Fischer Exhibit WRF-5

\$344.01	\$68.68	2(0)0)4 <i>227</i> /6, (18	9311(304) 20
\$354.87	\$70.91	38321 86 1 3	17/826221 25
\$303.72	\$149.27	©16(0)@(4\\$),/2/2	37/237771 16
\$292.61	\$70.30	17/57/934]. 13	7/910/4/0/53 5(0)
\$313.38	\$82.02]31 2826,35	58927/3/09,727/
\$291.21	\$81.31	399391,58	1/7/5/3(9)9/7/9/6
\$302.21	\$169.28	29 39 72.16	39 218(5/4,117/
\$489.31	\$102.91	4363648.27	688 395 74
\$290.14	\$68.77	1036814 92	448995(5024-894
\$539.27	\$177.11	201965677	882397 16
\$286.86	\$65.33	4(0)3 <i>27(2</i> (0),37	16491204.09
\$183.54	\$162.95	50436,29	17/489/5758
\$466.56	\$123.24	161453,32	7/1/9)2007/577
\$269.80	\$64.41	1967/186 49	8837468 41
\$360.60	\$92.02	21159587/85	265 (545, 20
\$368.58	\$89.67	5 2113€0,151	24/4/17/3/4/5/1
\$83.99	\$51.95	29546649	9(a0e)2(5),941
\$203.61	\$57.76	୍ଥି (ଚିଟ୍ରୀର ଓଡ଼ି	1(69) 204,57/
\$236.15	\$59.60	77/1/25/4,819	34304497, 94
\$234.19	\$67.72	(1889117/49)	7345031 (8
\$250.07	\$66.00	2362129.51	10449176,62
\$206.44	\$64.67	6001 <u>96</u> 10131 371	3(9)1444(5(9).77(1)
\$268.60	\$78.32	1 582955:29	245240 (8)5, 4(6)
\$156.42	\$48.73	49077520.411	2(1)24(7)27/3),34(
\$227.72	\$61.01	(6)6)9)1/4)8).7/4;	2951461,28
\$303.22	\$73.02	୍ର (୧୯୮୯)	38.420672 875
\$184.08	\$52.06	් වූදින් දැන්වෙන්ව සිලි ්	3057297/8.34
\$342.96	\$69.80	\$15, 30/1(9)60(9) 7/0)	13934338425
\$285.40	\$67.97	11.5 238417/ 31 819),344	1056439682
\$264.51	\$61.76	43(39 (37/6) 5 <u>1</u>	19545309.08
\$367.35	\$73.45	64292862/5	2995245226
\$89.23	\$37.45	(e. 1. 107/67/03(0.975)	456741036168
\$397.11	\$123.30	2 <mark>87</mark> 7704, 492	112/5/5/1/02/1/5/7/
\$237.66	\$62.75	1982225555	8(87/54448) 8/2
\$322.65	\$71.57	1/92/00909/2 (6/0	2121559222 575.
\$230.49	\$57.10	4/2/(6919)(60)	187/95014 37
\$221.56	\$62.92	Terri (18:16:259) 7/1	7/\$/4/6/4/5/11/2/1
\$305.83	\$73.20	8772222(8)	39)27/87/0.7/49
\$480.58	\$135.68	71(3729,26	311808883,19
\$478.41	\$103.50	(34,7781,41,38)	30 (959) 32
\$266.60	\$66.72	[5][/4:4]\$(6);4!9)	ම්7/56824 9 8,
\$259.89	\$68.09	2(6244)0(9(0) 7/8)	1/17/10:685.25
\$204.83	\$56.95	628377313	27585143.29
\$272.20	\$74.31 \$93.64	2257847 945	994;3922,24
\$347.00	\$83.64 \$67.80	163030033 88	727791290 22

\$67.80 163930933.88 727791290.22

		- Business Lines		
WC NAME:	CLLI	(from IC(M)		
TAMPA MAIN	TAMPFLXX22H	1577/45	\$186.56	\$791.37
ST. ARMANDS KEY	SARKFLXARSA	1/2/21	\$192.85	\$787.00
BEACH PARK	BHPKFLXA28H	20745	\$193.93	\$816.61
ST. PETERSBURG MAIN	SPBGFLXA89H	2507/1	\$195.74	\$847.48
SARASOTA MAIN	SRSTFLXA95H	35118	\$198.93	\$870.58
ANNA MARIA	ANMRFLXA77H	1656	\$199.43	\$855.45
GANDY	GNDYFLXA57H	9139	\$200.78	\$839.16
HYDE PARK	HYPKFLXADS0	9292	\$201.61	\$875.43
WESTSIDE	WSSDFLXA87H	3/104/5	\$202.41	\$887.91
SIESTA KEY	SEKYFLXA34H	1907	\$202.70	\$886.89
LARGO	LRGOFLXA58H	10892	\$202.84	\$896.13
INDIAN ROCKS	INRKFLXX59H	3558	\$203.89	\$900.35
UNIVERSITY	UNVRFLXA97H	20669	\$204.02	\$909.33
FEATHER SOUND	FHSDFLXA57H	12701	\$204.13	\$883.76
SOUTH GULF BEACH	SGBEFLXA36H	67/58	\$205.50	\$914.06
ST. PETERSBURG SOUTH	SPBGFLXS86H	3254.	\$205.64	\$907.03
SEMINOLE	SMNLFLXA23H	44102	\$206.02	\$889.25
VENICE MAIN	VENCFLXA48H	8811	\$206.14	\$901.88
CLEARWATER	CLWRFLXA44H	31307	\$206.44	\$924.38
DUNEDIN	DNDNFLXA73H	5/4910	\$206.52	\$901.73
TEMPLE TERRACE	TMTRFLXADS0	947/8	\$207.03	\$915.32
BRADENTON MAIN	BRTNFLXX74H	17/251	\$207.49	\$923.06
SWEETWATER	SWTHFLXA88H	20843	\$208.19	\$937.74
SKYWAY	SKWYFLXADS0	8050	\$209.08	\$912.43
SULPHUR SPRINGS	SLSPFLXA93H	######################################	\$209.26	\$925.69
PASADENA	PSDNFLXA34H	013/3(0)	\$209.72	\$942.16
BARTOW MAIN	BARTFLXA53H	7/658	\$210.02	\$872.61
WALLCRAFT	WLCRFLXA83H	7/192	\$210.58	\$939.49
WINTER HAVEN	WNHNFLXC29H	412/5/418	\$210.80	\$933.88
PINELLAS	PNLSFLXA53H	110031	\$211.17	\$956.41
ENGLEWOOD	ENWDFLXA47H	4951644	\$211.94	\$925.47
ST. GEORGE	STGRFLXA78H	11(080)	\$212.29	\$955.19
BAYOU	BAYUFLXA54H	108/24	\$212.51	\$950.71
PALMA SOLA	PLSLFLXA79H	5/10/4	\$212.93	\$959.15
COUNTRYSIDE	CNSDFLXA79H	1/6/8/08	\$213.15	\$986.13
NORTHSIDE	NRSDFLXA35H	3223	\$213.78	\$961.21
LAKE WALES MAIN	LKWLFLXA67H	7/2/16	\$214.08	\$889.40
YBOR CITY	YBCTFLXA24H	1/0582	\$214.38 _	\$944.16
AUBURNDALE	ABDLFLXA96H	4,3107/	\$214.42	\$914.42
LEALMAN	LLMNFLXADS0	:8778	\$214.91	\$973.14
LAKELAND MAIN	LKLDFLXA68H	20193	\$214.92	\$973.20
SARASOTA SPRINGS	SPRGFLXA37H	9118	\$215.66	\$970.07
VENICE SOUTH	VENCFLXSDS0	/4(0)/4(d)	\$215.90	\$972.25
SEVEN SPRINGS	SNSPFLXA37H	269ê)	\$215.99	\$941.16
NORTH GULF BEACH	NGBHFLXA39H	(9)27/S	\$216.14	\$1,004.13

Dockt NO. 990649B-TP Rebuttal Testimony of Warren R. Fischer Exhibit WRF-5

T. DDGU GDDU GG					IL VVIKIT-D
TARPON SPRINGS	TRSPFLXA93H	3979	\$216.17	FPS 659536h 229t_	
BRANDON	BRNDFLXA68H	1/7/0/2/2	\$216.38	\$996.75	
SOUTHSIDE	SSDSFLXA92H	(3939)	\$216.59	\$1,003.26	
CARROLLWOOD	CRWDFLXA96H	1/4/67/75	\$217.34	\$996.21	
NEW PORT RICHEY	NPRCFLXA84H	17/594	\$217.81	\$1,013.20	
BRADENTON BAY	BRBAFLXA75H	1/27/3(0)	\$217.91	\$1,027.05	
OSPREY	OSPRFLXA96H	1/3/27/	\$218.71	\$960.04	
TAMPA EAST	TAMPFLXEDS0	22912(611)	\$219.72	\$1,023.62	
CYPRESS GARDENS	CYGRFLXA32H	[9)5(8)	\$220.22	\$956.06	
OLDSMAR	OLDSFLXA85H	(519)515)	\$220.37	\$978.56	
HIGHLANDS	HGLDFLXA64H	. 927/6	\$220.80	\$1,006.36	
LUTZ	LUTZFLXA94H	3626	\$222.45	\$1,018.00	
LAKELAND NORTH	LKLDFLXN85H	4,960	\$223.08	\$997.94	
ZEPHYR HILLS	ZPHYFLXA78H	v - 1 (87714)	\$223.14	\$1,006.63	
HUDSON	HDSNFLXA86H	7/803	\$223.17	\$1,022.90	
HAINES CITY MAIN	HNCYFLXA42H	5/27/1	\$223.39	\$953.99	
LONGBOAT	LGBKFLXA38H	12395	\$223.83	\$1,046.99	
BAYSHORE	BYSHFLXA84H	ଗ୍ରିଟ୍ରେ	\$223.88	\$903.20	ş · · •
LAKELAND EAST	LKLDFLXE66H	@ (9) (0)(1	\$223.96	\$1,025.02	
LAKE ALFRED	LKALFLXA95H	3(0)4	\$226.70	\$876.65	
RUSKIN	RSKNFLXA64H	2 58 8	\$227.19	\$1,024.65	
PLANT CITY	PTCYFLXA75H	@y4 y 8f]	\$227.78	\$1,017.99	
MULBERRY	MLBYFLXARSA	1712	\$231.99	\$925.80	
FROSTPROOF	FRSTFLXA63H	1430	\$236.07	\$868.43	
WESLEY CHAPEL	WLCHFLXA97H	2698	\$240.11	\$1,116.37	
PALMETTO	PLMTFLXA72H	5670	\$240.50	\$1,125.47	
MOON LAKE	MNLKFLXA85H	4131	\$242.17	\$1,097.29	-
THONOTOSASSA	THNTFLXADS0	1178	\$244.23	\$1,048.48	
BABSON PARK	BBPKFLXARSA	834	\$246.44	\$1,054.39	
KEYSTONE	KYSTFLXA92H	3/18/4	\$247.14	\$1,151.61	
PARRISH	PRSHFLXARSA	650		\$1,106.47	
POINCIANA	POINFLXARSA	201	\$249.43	\$870.13	-
ALAFIA	ALFAFLXA67H	3662	\$249.89	\$1,136.04	
NORTHPORT	NRPTFLXA42H	3837	\$250.44	\$970.49	
WIMAUMA	WIMMFLXA63H	2 :3010).	\$254.90	\$1,118.17	٠ ـ .
HAINES CITY NORTH	HNCYFLXN424	1459	\$258.78	\$1,272.64	
DUNDEE	DUNDFLXA43H	3 50	\$258.96	\$1,000.25	
POLK CITY	PKCYFLXARSA	921	\$259.47	\$969.22	
LAND O' LAKES	LNLKFLXA99H	21114	\$263.43	\$1,142.23	
ALTURAS	ALTRFLXARSA	<u> </u>	\$264.75	\$1,095.86	
PINECREST	PNCRFLXA73J	-10-7 7/56	\$277.32	\$1,167.19	
MYAKKA CITY	MYCYFLXA32H	5(a)€	\$329.22	\$1,278.83	
LAKE WALES EAST	LKWLFLXERSA	8,816) 8,816)	\$339.12	\$1,199.24	
BRADLEY	BRJTFLXARSA	350101 77 (9)	\$458.10	\$1,092.26	
INDIAN LAKE	INLKFLXARSA	2(6/4)	\$466.70	\$1,340.46	
Florida Average	Florida Average		\$210.82	\$935.97	
	i lollua Avelage	777579	⊅ ∡ 1U.0∠	\$\$35.87	

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Dockt NO. 990649B-TP Rebuttal Testimony of Warren R. Fischer Exhibit WRF-5

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\$322.65	\$71.57	1(9/4)(2(9)2(6))	8865922.55
\$335.17	\$70.38	3683246 33	16966642:34
\$342.96	\$69.80	\$10,110,000,000,770)	1398443821,25
\$334.52	\$72.56	31/500/41/2 1/8	1/4619332.79
\$354.87	\$70.91	385 <u>2</u> 136 13	17826221, 25
\$371.46	\$68.93	27/7/397/5/62	1307743489.077
\$291.21	\$81.31	3(0)9/5(9rl /5/8)	17/53997/96
\$367.35	\$73.45	6/4/219/2/316/4/5	2995245276
\$286.44	\$85.25	4,3(0,0094) 412	1/36.7/1/35, 7/8
\$313.38	\$82.02	1,3(12/9/2/6,3)5	5,6327,000 27
\$346.67	\$78.55	2048115,62	9834950 02
\$360.62	\$80.33	(30)7(0)4(6) (6)3	3/69/3(31/0/9/4
\$336.60	\$84.88	(#OBK9)5)37/ 7/8)	4656404.78
\$347.00	\$83.64	[4]9)81[4]55,24]	67/5/84/9/5/27/
\$366.48	\$81.13	1761478 12	3073725 39
\$283.97	\$92.52	117748170	500284841.416
\$395.34	\$78.78	්	2/5/07/52/(8/5)9)
\$223.15	\$101.65	. (3) (867 60)	531(987, 36)
\$369.02	\$82.52	2/2117/3485.489	10/14/86,7/5 9/5
\$191.35	\$112.04	1682/267/ 727/	7/0/49812/61/5/41
\$368.58	\$89.67	5541 il 3(9)0 (5 i	244117341.51
\$360.60	\$92.02	2159537/35	9651545.20
\$250.21	\$115.85	3(9)7 (15,8),616)	1/5/8/49/75, 17/
\$181.51	\$133.90	26)67/6(0.4)6	981326 52
\$478.41	\$103.50	(6/47/8) [/4] (69)	3011959:32
\$489.31	\$102.91	136361827	63811395.74
\$455.56	\$111.06	27/3/899 7/9	124,1063, 16
\$397.11	\$123.30	287740442	1235104.47
\$404.19	\$127.21	2023794995	3 76196,36
\$520.62	\$113.34	7/86/8/8/4 3/8	3666729.97
\$466.56	\$123.24	1/6/1/4/5/31/3/2	7/192/07/57/
\$183.54	\$162.95	75(0) (EX6) 219	:[7/4 8 <mark>:</mark> 9 5, 5 : 8
\$501.96	\$121.85	97;51(0)5,246	4160166, 32
\$303.72	\$149.27	* 9 300 9445;22	37/2/37/7/1 1/6
\$480.58	\$135.68	7/13/7/219,216	\$71,646)8(818, 119)
\$665.55	\$119.72	377/5(57/3(6)	185678206
\$339.36	\$163.25	349,596.37	1835(03(310))34
\$302.21	\$169.28	23(6)37/2 (76)	89266417
\$509.39	\$150.58	558897,53	241/4(6)8/1/54
\$453.86	\$160.81	7/5.1/8)9).074	31 225 30
\$539.27 \$670.00	\$177.11	20965677	882367, 15
\$672.96 \$577.05	\$273.30	1186339,25	729816.47
\$577.65 \$440.54	\$307.62	113604.95	401744.21
\$449.54	\$585.62	3/29/317/41:35	7/85888.78
\$746.76	\$565.19	1/25/2018/75	35,3(3)80,4(6)
	\$67.80	163930933.88	727791290.22
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