LAW OFFICES

## Messer, Caparello & Self

A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701 POST OFFICE BOX 1876 TALLAHASSEE, FLORIDA 32302-1876 TELEPHONE (850) 222-0720 TELECOPIER (850) 224-4359 INTERNET www.lawfla.com

June 21, 2002

## **BY HAND DELIVERY**

Ms. Blanca Bayó, Director The Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket 990649B-TP

Dear Ms. Bayó:

The post hearing brief of AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc, and Florida Digital Network, Inc. filed on May 28, 2002, in the above referenced proceeding contains a minor typographical error in the table on page eight of the brief. Enclosed for filing are an original and fifteen copies of a replacement page that shows the appropriate correction in type and strike format.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing. If you have any questions, please do not hesitate to contact me at (850) 425-5209.

Sincerely yours,

Tracy W. Hatch

TWH/amb Enclosures cc: Parties of Record

06432 JUN 21 8

FPSC-CONTRACTOR CLERK

	Statewide Average
ILEC and State	Voice Grade Loop Rate <sup>1</sup>
Verizon New Jersey	\$9.53
SBC California	\$9.93
Verizon New York	\$11.49
ALEC Proposed	\$13.97
BellSouth-FL Current	
Verizon Proposed	\$26.19

In fact, Verizon's proposal for statewide average voice grade loop rate in this proceeding is more than double the statewide average rate in other states. Similarly, Verizon proposes significantly higher rates for DS1 loops, DSO port, and end office switch usage. (Exh. 61, AHA-4)

Verizon's proposal does not even come close to passing the "red-face" test. For example, the Commission established a switching port rate for BellSouth Florida of \$1.17. (Tr. 1259) The Commission did not deaverage ports in BellSouth's vast Florida territory because the cost of switching generally should cost the same. Yet, if Verizon placed the same switch in Tampa, it proposes that a port cost of \$3.30 – three times higher! Incredible, considering the switch would be in a similar building, operated by the same types of telecommunications technicians, and central office technicians. Something is clearly wrong.

<sup>&</sup>lt;sup>1</sup> (Exh. 61, AHA-4); CA DN 01-02-024, Interim Opinion Establishing Interim Rates for Pacific Bell Telephone Company's Unbundled Loops and Unbundled Switching Network Elements, issued May 16, 2002; Order on Unbundled Network Elements Rates, Case 98-C-1357, issued January 28, 2002, NYPSC; Order Instituting Verizon Incentive Plan, Cases 98-C-1357, 00-C-1945, issued