

ORIGINAL

DOCKET NO.: 971140-TP - [BellSouth Telecommunications, Inc.]

WITNESS: Direct Testimony Of Ruth K. Young. Appearing On Behalf Of The Staff  
Of The Florida Public Service Commission, Division Of Auditing And Financial  
Analysis

DATE FILED: February 17, 1998

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DOCUMENT NO.
02305-98
2-17-98

DIRECT TESTIMONY OF RUTH YOUNG

1 |  
2 Q. Please state your name and business address.

3 A. My name is Ruth Young, and my business address is 3625 N.W. 82nd  
4 Avenue., Suite 400, Miami, Florida 33166.

5 Q. By whom are you presently employed and in what capacity?

6 A. I am employed by the Florida Public Service Commission as a Professional  
7 Accountant Specialist in the Division of Auditing and Financial Analysis.

8 Q. How long have you been employed by the Commission?

9 A. I have been employed by the Florida Public Service Commission for  
10 approximately nineteen years.

11 Q. Briefly review your educational and professional background.

12 A. I have a bachelor of Business Administration degree from Adelphi  
13 University in New York. I am a Certified Public Accountant licensed in the  
14 State of Florida. I am also a Certified Fraud Examiner.

15 Q. Please describe your current responsibilities.

16 A. Currently, I am a Professional Accountant Specialist with the  
17 responsibilities of planning and directing audits of regulated companies, and  
18 assisting in audits of affiliated transactions. I am also responsible for  
19 creating audit work programs to meet a specific audit purpose, and I have  
20 specific authority to direct and control assigned staff work, as well as,  
21 participate as a staff auditor and audit manager.

22 Q. Have you presented expert testimony before this Commission or any other  
23 regulatory agency?

24 A. Yes, I have testified in a water and sewer rate case for Century  
25 Utilities, Inc., Docket No. 800170-WS.

1 | Q. What is the purpose of your testimony today?

2 | A. I am sponsoring the staff audit performed in this docket and will  
3 | testify regarding the audit opinions and observations. The staff audit report  
4 | is identified as Exhibit RKY-1.

5 | Q. Are you sponsoring any other exhibits?

6 | A. Yes, I am sponsoring RKY-2 which are the 46-3 work papers from the audit  
7 | and support portions of Audit Disclosure 2. I am also sponsoring RKY-3 which  
8 | are selected work papers from the 44 series which help support my work  
9 | regarding non-recurring costs.

10 | Q. Does this conclude your testimony?

11 | A. Yes, it does.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Motions of AT&T  
Communications of the Southern  
States, Inc. and MCI  
Telecommunications Corporation  
and MCI Metro Access  
Transmission Services, Inc. to  
compel BellSouth  
Telecommunications, Inc. to  
comply with Order PSC-96-1579-  
FOF-TP and to set non-recurring  
charges for combinations of  
network elements with BellSouth  
Telecommunications, Inc.  
pursuant to their agreement.

DOCKET NO. 971140-TP

DATED: FEBRUARY 18, 1998

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that one true and correct copy of Staff's  
Prefiled Direct Testimony of Ruth Young has been furnished **by hand  
delivery(\*) or Airborne Express (\*\*)** this 18th day of February,  
1998, to the following:

Nancy B. White, Esquire (\*)  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Ste 400  
Tallahassee, Florida 32301-1556

Thomas K. Bond, Esquire (\*\*)  
MCI Telecommunications Corp.  
780 Johnson Ferry Road, Ste 700  
Atlanta, Georgia 30342

Richard D. Melson, Esquire (\*)  
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123 South Calhoun Street  
Tallahassee, Florida 32301

Tracy Hatch, Esquire (\*)  
AT&T Communications of the  
Southern States, Inc.  
101 North Monroe Street  
Tallahassee, Florida 32301-1549

  
\_\_\_\_\_  
CHARLES J. PELLEGRINI  
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FLORIDA PUBLIC SERVICE COMMISSION  
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**FLORIDA PUBLIC SERVICE COMMISSION**

*DIVISION OF AUDITING AND FINANCIAL ANALYSIS  
BUREAU OF AUDITING*

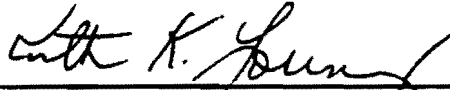
*Miami District Office*

**BELL SOUTH TELECOMMUNICATIONS**

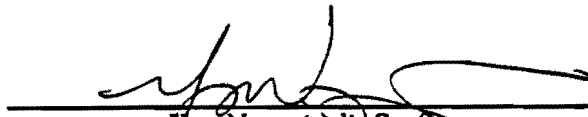
**LOOP AND PORT COMBINATIONS**

**ESTIMATED YEAR END DECEMBER 31, 1997**

**DOCKETED NO. 971140-TP  
AUDIT CONTROL NO. 98-012-4-1**

  
\_\_\_\_\_  
*Ruth K. Young, Audit Manager*

  
\_\_\_\_\_  
*Iliana Piedra, Audit Staff*

  
\_\_\_\_\_  
*Yen Ngo, Audit Staff*

  
\_\_\_\_\_  
*Edward Gross, Engineer Staff*

  
\_\_\_\_\_  
*Kathy L. Welch, Audit Supervisor*

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**DIVISION OF AUDITING AND FINANCIAL ANALYSIS  
AUDITOR'S REPORT**

**FEBRUARY 16, 1998**

**TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES**

We have applied the procedures described later in this report to identify the components of non recurring charges for the following elements (1) 2-Wire analog loop and port for migration of an existing customer, (2) 2-Wire ISDN loop and port for migration of an existing customer, (3) 4-Wire analog loop and port for migration of an existing customer, and (4) 4-Wire DS1 and port for migration of an existing customer. Also we tried to identify which of these non-recurring charges will only be incurred once when a loop and port are ordered as a combination in a single order.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this report should not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

In our opinion, the schedules referred to above present fairly, in all material respects, the utility's books and records, maintained in conformity with the accounting practices prescribed by the Florida Public Service Commission. The attached findings discuss all differences and other matters which were noted during our examination.

## SUMMARY OF SIGNIFICANT PROCEDURES

Our audit was performed by examining on a test basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below.

The following information was read:

1. MCI's petition (8/28/97) and BellSouth's response (9/17/97) regarding the cost for the non-recurring charges
2. A.J. Varner's testimony dated 11/13/97
3. Testimony filed 1/29/98 by A.J. Varner, D. Caldwell, J., Hendrix and Eno Landry
4. PSC Order PSC-96-1579-TP, Docket 960833-TP

The following steps were performed:

Interviewed BellSouth representatives to obtain an understanding of the computerized ordering system, to obtain knowledge of records used from inception (service order) to end (connect and test).

Interviewed Bell South subject matter experts to determine the details of the provisioning tasks involved in the elements listed in BellSouth Telecommunications DDC-1 schedules filed in Docket 971140-TP on 1/29/98.

Analyzed schedules DDC-7 , DDC-8 and DDC-9 from Docket 960833-TP and reconciled them to Exhibit AJV-2 in Al Varner's testimony (BellSouth Telecommunications).

Prepared a comparison of the permanent costs approved by the Commission in PSC Order No. PSC-96-1579-FOF-TP to the costs used as a basis for the percent discounts. The discounts are in AJV-2 (1/29/98). The costs are in the DDC-1 schedules (1/19/98).

Requested a list of all loop/port combinations completed by BellSouth Telecommunications in 1997, and prepared a schedule of the jobs with the end user phone number and related Alternative Local Exchange Company.

Reconciled source documentation for labor rates for JFC's 341X and 400X used in the cost studies in the DDC-1 schedules to extracts from the company payroll registers.

Staff attempted to verify that all tasks recorded in DDC-1 were actually performed for all loop and port combinations done in 1997 by reviewing the service orders and other computerized systems where log in by the various personnel occurred. Staff was unable to complete this task because of the lateness of the company's response.



## AUDIT DISCLOSURES

### Audit Disclosure 1

**Subject:** Content of BellSouth DDC-1 Schedules Filed January 29, 1998

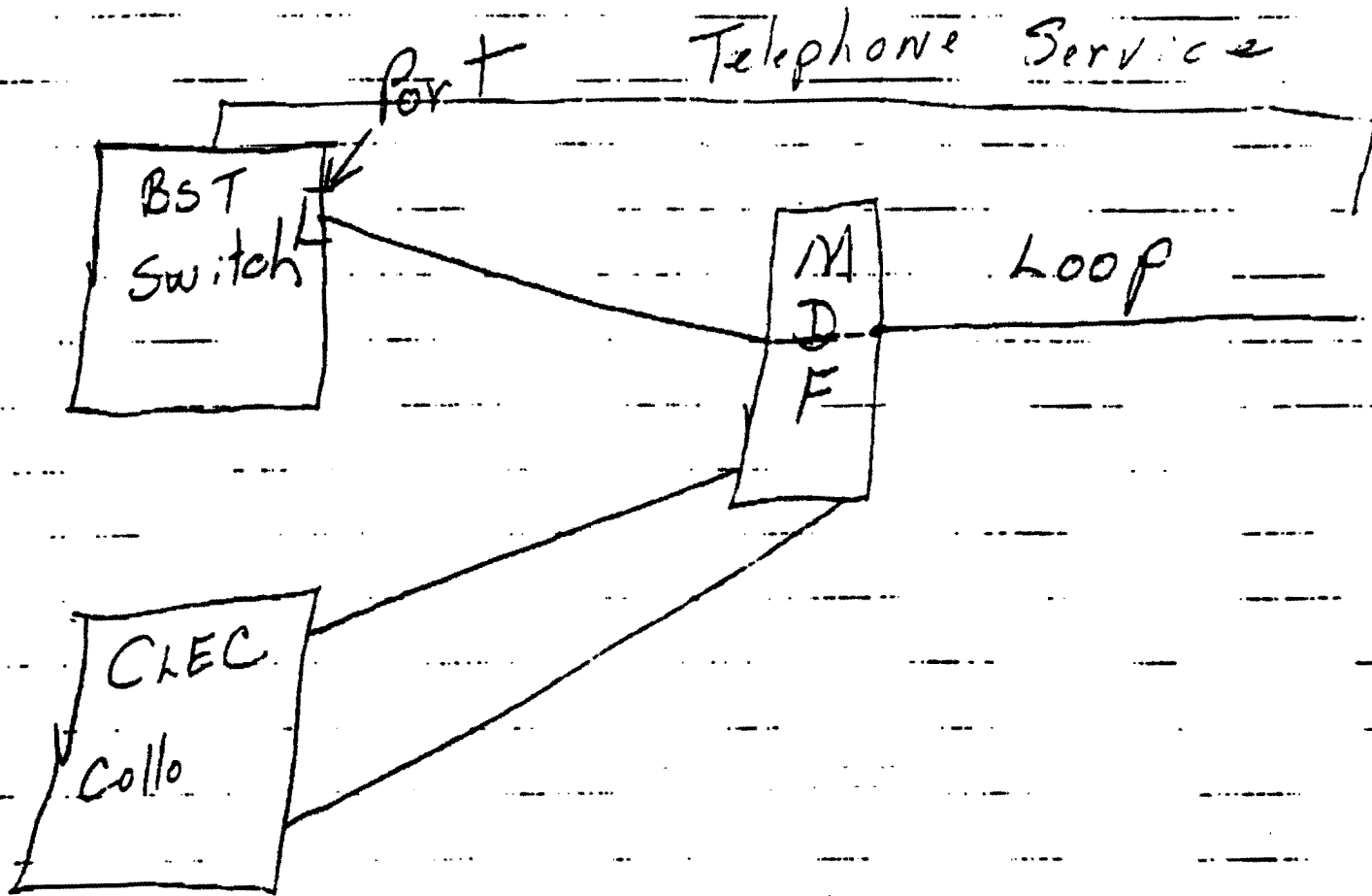
**Statement of Facts:** In Order No. PSC-98-0090-PCO-TP, the question in Issue 8 is: "What is the appropriate non-recurring charge for each of the following combinations of network elements for migration of an existing BellSouth customer: (2) 2-wire analog loop and port; (b) 2-wire ISDN loop and port; (c) 4-wire analog loop and port; and (d) 4-wire DS1 and port?"

According to the information provided by BellSouth through interviews with their subject matter experts, information in the testimonies of A.J. Varner, Eno Landry, and Deonne Caldwell, analysis of cost studies filed in Dockets No. 960833-TP and 971140-TP, staff determined that BellSouth policy was that migration of an unbundled loop and unbundled port together was resale. According to BellSouth, the DDC-1 schedules are for existing and nonexisting facilities and do not address migration. The combination of an unbundled loop and unbundled port ordered together was the ordering of two unbundled elements and even though ordered at the same time had to be processed separately. The process to provide these two unbundled elements per BellSouth was described to us based on the diagram included as Exhibit 1 to this disclosure.

The diagram shows that both of these items are on the line side of the switch. The loop and port meet from opposite sides at the main distribution frame. The port comes from the switch at the central office and the loop comes from the field. The loop and port are drawn from the main distribution frame as two separate lines to the Alternative Local Exchange Company connection. Per BellSouth this process requires that the loop and port be physically separated.

The DDC-1 cost studies filed in Docket No. 971140-TP are based on nonexisting and existing elements and the assumption is that these two elements must be separated (as shown in the diagram) in order to be provided to an Alternative Local Exchange Company.

**Opinion:** The DDC-1 schedules filed by BellSouth do not represent the migration of an existing BellSouth customer for the four scenarios in Issue 8. BellSouth's definition of migration is resale. It appears that the DDC-1 schedules assume that the loop and port have to be separated to be provided to the Alternative Local Exchange Company.



**Audit Disclosure 2**

**Subject:** Exhibit AJV-2 to Al Varner's Testimony Dated January 29, 1998

**Statement of Facts:** The "Percent Discount for UNE's Ordered at the Same Time" on AJV-2, Docket No. 971140-TP, January 29, 1998, are based on the costs presented in DDC-1 schedules discussed in Audit Disclosure 1.

The costs used in DDC-1 to determine the percents in AJV-2 are different than those permanent rates approved by the Commission in FPSC Order PSC-96-1679-FOF-TP.

The times used in DDC-1 to determine the percents in AJV-2 are different than the times used to set the permanent rates in Docket 960833-TP.

The difference in the costs and times are detailed in Exhibit 1 to this disclosure.

**Opinion:** If it is determined that BellSouth's information in the cost studies does not address issue 8, then these percents would not apply.

Also, if these cost studies should have been based on the permanent rates approved by the FPSC and/or times used in Docket 960833-TP, then these percents would not apply.

**EXHIBIT TO DISCLOSURE 2**

**BST  
COMPARISON OF COSTS USED TO CALCULATED % IN AJV-2  
WITH PERMANENT RATES APPROVED BY THE PSC**

	FIRST INDIVIDUAL -----			FIRST TOGETHER-----		
	PSC Approved Rates Per AJV-2 Revised 1/29/98 Dkt 960833-TP	Per Exhibit DDC-1 Dkt 971140-TP Page 1 of 33	DIFFERENCE	PSC Approved Rates Per AJV-2 Revised 1/29/98	Per Exhibit DDC-1 Dkt 971140-TP Page 1 of 33	DIFFERENCE
<b>2 wire analog loop and port</b>						
2 wire analog voice grade loop	140.00	228.09	88.09		228.09	228.09
Exchange ports - 2 wire analog line port (Res -Bus)	38.00	71.08	33.08		57.25	57.25
<b>Total</b>	<b>178.00</b>	<b>299.17</b>	<b>121.17</b>	<b>169.10</b>	<b>285.34</b>	<b>116.24</b>
<b>2 wire ISDN loop and port</b>						
2 wire ISDN digital grade loop	306.00	479.47	173.47		470.43	470.43
Exchange ports - 2-wire ISDN ort	88.00	136.04	48.04		127.00	127.00
<b>Total</b>	<b>394.00</b>	<b>615.51</b>	<b>221.51</b>	<b>382.18</b>	<b>597.43</b>	<b>215.25</b>
<b>4 wire analog loop and port</b>						
4 wire analog vice grade loop	141.00	439.88	298.88		430.84	430.84
Exchange Ports - Voice Grade Port	66.14	69.13	2.99		55.57	55.57
<b>Total</b>	<b>207.14</b>	<b>509.01</b>	<b>301.87</b>	<b>198.85</b>	<b>486.41</b>	<b>287.56</b>
<b>4 wire DS1 Digital loop and port</b>						
4 wire DS1 digital loop	540.00	776.53	236.53		776.53	776.53
	112.00	350.80	238.80		341.75	341.75
<b>Total</b>	<b>652.00</b>	<b>1,127.33</b>	<b>475.33</b>	<b>648.48</b>	<b>1,118.28</b>	<b>469.80</b>

**BST**  
**COMPARISON OF LOOP COMPONENTS**  
**2 WIRE ANALOG VOICE GRADE LOOP**

2 WIRE ANALOG VOICE GRADE LOOP	DOCKET 960833-TP	DOCKET 971140-TP	DIFFERENCE	FUNCTION
	WORKTIMES	DOC-1 WORKTIMES		
CUSTOMER POINT OF CONTACT - ICSC	0.5000	0.5000	0.0000	2300 SERVICE ORDER
FACILITIES ASSIGNMENT - FACS	0.0167		0.0167	
CIRCUIT PROVISIONING CENTER - CPC	0.2633	0.0500	0.2133	470X - SO SERVICE ORDER
		0.1300	0.1300	470X - ENG ENGINEERING
NETWORK ADMINISTRATION	0.3605		0.3605	
CO INSTALL & MTCE - CKT & FAC - NTEL	0.6365	0.0583	0.5782	431X CONNECT & TEST
INSTALL & MTCE - SPECS SVCS - SSIM (CC:?) & TEST	0.5000	0.3175	0.1825	411X CONNECT & TEST
INSTALL & MTCE - SPECS SVCS - SSIM (TRAVEL)	0.3000	0.0600	0.2400	411X TRAVEL
WORK MANAGEMENT CENTER (WMC)		0.2500	0.2500	4VXX SERVICE ORDER
ACC CUSTOMER ADVOCATE CENTR (ACAC)		0.1833	0.1833	471X SERVICE ORDER
INSTALL & MTC - SPEC SVCS SSIM		0.3072	0.3072	411X SERVICE ORDER
ADDRESS & FAC INVEN (AFIG)		0.2000	0.2000	400X ENGINEERING
OUTSIDE PLANT ENG (FG30)		0.1000	0.1000	32XX ENGINEERING
ACC CUSTOMER ADVOCATE CENTR (ACAC)		0.9528	0.9528	471X CONNECT & TEST
	2.5770	3.1091	0.5321	
	=====	=====	=====	

BST  
 COMPARISON OF LOOP COMPONENTS  
 4 WIRE ANALOG VOICE GRADE LOOP

4 WIRE ANALOG VOICE GRADE LOOP	DOCKET 960833-TP	DOCKET 971140-TP	DIFFERENCE	FUNCTION
	WORKTIMES	DDC-1 WORKTIMES		
CUSTOMER POINT OF CONTACT - ICSC	0.5000	0.5000	0.0000	2300 SERVICE ORDER
FACILITIES ASSIGNMENT - FACS	0.0167		0.0167	
CIRCUIT PROVISIONING CENTER - CPC	0.2633			
NETWORK ADMINISTRATION	0.3605	0.0500	0.2133	470X - SO SERVICE ORDER
CO INSTALL & MTCE - CKT & FAC - NTEL	0.6548	0.1300	-0.1300	470X - ENG ENGINEERING
INSTALL & MTCE - SPECS SVCS - SSIM (CONN & TEST)	0.5000	0.0140	0.3465	341X CONNECT & TEST
INSTALL & MTCE - SPECS SVCS - SSIM (TRAVEL)	0.3000	0.0583	0.5965	431X CONNECT & TEST
		2.4560	-1.9560	411X CONNECT & TEST
		0.3000	0.0000	411X TRAVEL
WORK MANAGEMENT CENTER (WMC)		0.2500	-0.2500	4VXX SERVICE ORDER
ACC CUSTOMER ADVOCATE CENTR (ACAC)		0.1833	-0.1833	471X SERVICE ORDER
INSTALL & MTC - SPEC SVCS SSIM		0.3072	-0.3072	411X SERVICE ORDER
ADDRESS & FAC INVEN (AFIG)		0.2000	-0.2000	400X ENGINEERING
OUTSIDE PLANT ENG (FG30)		0.1000	-0.1000	32XX ENGINEERING
ACC CUSTOMER ADVOCATE CENTR (ACAC)		0.9528	-0.9528	471X CONNECT & TEST
	2.5953	5.5036	-2.9083	

BST  
 COMPARISON OF LOOP COMPONENTS  
 2 WIRE ISDN DIGITAL LOOP

2 WIRE ISDN DIGITAL LOOP	DOCKET 960833-TP	DOCKET 971140-TP		FUNCTION
	WORKTIMES	DDC-1 WORKTIMES	DIFFERENCE	
CUSTOMER POINT OF CONTACT - ICSC	0.5000	0.5000	0.0000	2300 SERVICE ORDER
INSTALLATION & MTCE CENTER (IMC)	0.3833	0.3072	0.0761	411X SERVICE ORDER
CIRCUIT PROVISIONING CENTER - CPC	0.3233	0.0500	0.2733	470X SERVICE ORDER
		0.1300	-0.1300	470X ENGINEERING
FACILITIES ASSIGNMENT - FACS	0.0890		0.0890	
OUTSIDE PLANT ENGINEER (OSPE)	0.8503	0.4078	0.4425	32XX ENGINEERING
CO ADMIN CKT CARRIER & FAC (NTEC)	0.7342		0.7342	
NETWORK PLUG IN ADMINISTRATION (PICS)	0.0140	0.0140	0.0000	341X CONNECT & TEST
NETWORK SERVICES - CLERICAL	0.0650		0.0650	
SPECIAL SERVICES COORD & TESTING (SSC)	0.7350		0.7350	
INSTALL & MTCE -SPECS SVCS - SSIM	2.7090	2.7090	0.0000	411X CONNECT & TEST
INSTALL & MTCE -SPECS SVCS - SSIM	0.6850	0.3000	0.3850	411X TRAVEL
			0.0000	
WORK MANAGEMENT CENTER (WMC)		0.2500	-0.2500	4WXX SERVICE ORDER
ACC CUSTOMER ADVOCATE CENTR (ACAC)		0.1833	-0.1833	471X SERVICE ORDER
ADDRESS & FACILITY INVENTORY (AFIG)		0.2000	-0.2000	
CO INSTALL & MTC FLD CKT & FAC		0.0583	-0.0583	431X CONNECT & TEST
ACC CUSTOMER ADVOCATE CENTR (ACAC)		0.9528	-0.9528	471X CONNECT & TEST
	7.0881	6.0624	1.0257	
	=====	=====	=====	

BS7  
COMPARISON OF LOOP COMPONENTS  
4 WIRE DS1 DIGITAL LOOP

4 WIRE DS1 DIGITAL LOOP	DOCKET 960833-TP	DOCKET 971140-TP	DIFFERENCE	FUNCTION
	WORKTIMES	DOO-1 WORKTIMES		
SERVICE ORDER -				
CUSTOMER POINT OF CONTACT - ICSC	0.5000	0.5000	0.0000	2300 SERVICE ORDER
ISC TEAM MEMBER	1.1718		1.1718	
ISC CLERICAL SUPPORT	0.7500		0.7500	
CIRCUIT PROVISIONING CENTER - CPC	0.1333	0.1333	0.0000	470X SERVICE ORDER
NETWORK PLUG - IN ADMINISTRATION - PICS	0.0500	0.0333	0.0167	341X SERVICE ORDER
NETWORK ADMINISTRATION	0.0385		0.0385	
CO INSTALL & MTCE - CXT & FAC INTEL	0.0417		0.0417	
INSTALLATIONAL & MTCE CENTER - IMC	0.3577	0.2500	0.1077	411X SERVICE ORDER
			0.0000	
ENGINEERING -			0.0000	
FACILITIES ASSIGNMENT - FACS	0.0163		0.0163	
CIRCUIT PROVISIONING CENTER - CPC	0.4917	0.4917	0.0000	470X ENGINEERING
OUTSIDE PLANT ENGINEERING - OSPE	3.0000	3.0000	0.0000	32XX ENGINEERING
			0.0000	
CONNECT & TEST -			0.0000	
NETWORK ADMINISTRATION	1.7482		1.7482	
CO INSTALL & MTCE - CXT & FAC INTEL	0.8033	0.4167	0.3866	431X CONNECT & TEST
INSTALL & MTCE - SPECS SVCS SSIM	2.1333	3.6670	-1.5337	411X CONNECT & TEST
			0.0000	
TRAVEL			0.0000	
INSTALL MTCE - SPECS SVCS SSIM	0.3000	0.3000	0.0000	411X TRAVEL
			0.0000	
WORK MANAGEMENT CENTER (WMC)		0.7333	-0.7333	4WXX SERVICE ORDER
ACC CUSTOMER ADVOCATE CENTER (ACAC)		0.0633	-0.0633	471X SERVICE ORDER
ADDRESS & FACILITY INVENTORY (AFIG)		0.0167	-0.0167	400X ENGINEERING
			0.0000	
ACC CUSTOMER ADVOCATE CENTER (ACAC)		0.6500	-0.6500	471X CONNECT & TEST
	11.5358	10.2553	1.2805	
	=====	=====	=====	



BST  
 COMPARISON OF PORT COMPONENTS  
 2 WIRE ANALOG

	Docket no. 960833-TP 8/9/96	Docket no. 971140-TP DDC-1	Difference
S.O. 2300- customer portin of contact	0.5000	0.5000	0.0000
LCSC connect -			
Disconnect	0.3333	0.3333	0.0000
C&T 2730 - Network Services Clerical			
Installatin	0.0670	0.0104	0.0566
Disconnect	0.0070	0.0104	-0.0034
C&T 4N1X Recent Chng Line Trans			
Installtion	0.0000	0.0250	-0.0250
Disconnet	0.0000	0.0125	-0.0125
C&T 431X - Co Install &Mtce			
Installation	0.0220	0.1000	-0.0780
Disconnect	0.0020	0.0500	-0.0480
C&T 4Axx- ACAC			
Install	0.0000	0.2500	-0.2500
Disconnect	0.0000	0.0000	0.0000
	0.9313	1.2916	-0.3603

**BST  
COMPARISON OF PORT COMPONENTS  
4 Wire Analog Voice Grade Port**

	Docket No. 960833-TP 8/9/96	Docket No. 971140-TP DDC-1	Difference
<b>SO. JFC 2300 Cus Pt of Cntct ICSC</b>			
Install	0.5000	0.5000	0.0000
Disconnect	0.3330	0.3330	0.0000
<b>C&amp;T 2730 Network Services Clerical</b>			
Install	0.2500	0.0104	0.2396
Disconnect	0.0833	0.0104	0.0729
<b>C&amp;T 4N1X Recent Chng Line</b>			
Install	0.0000	0.0250	(0.0250)
Disconnect	0.0000	0.0125	(0.0125)
<b>C&amp;T 431X Co Install &amp; MTce Field</b>			
Install	0.0000	0.1000	(0.1000)
Disconnect	0.0000	0.0500	(0.0500)
<b>C&amp;T 4AXX ACAC</b>			
Install	0.0000	0.2500	(0.2500)
Disconnect	0.0000	0.0000	0.0000
<b>Circuit Provisioning Center</b>			
Install	0.5000	0	0.5000
Disconnect	0.2500	0	0.2500
<b>Switching Control Ccenter</b>			
Install	0.5000	0	0.5000
Disconnect	0.2500	0	0.2500
	<b>2.6663</b>	<b>1.2913</b>	<b>1.3750</b>
	=====	=====	=====

BST  
 COMPARISON OF PORT COMPONENTS  
 2 Wire ISDN

	Docket No. 960833-TP 8/9/96	Docket No. 971140-TP DDC-1	Difference
SO. 2300 -Cust Pont of Contact ICSC Installation	0.5000	1.0000	(0.5000)
Disconnect	0.3333	0.2500	0.0833
C&T 2730 Network Services Clerical Installation	0.0650	0.0650	0.0000
Disconnect	0.0000	0.0000	0.0000
C&T 4N1X Recent Chng Line Trans Install	0.0000	0.0667	(0.0667)
Disconnect	0.0000	0.0333	(0.0333)
C&T 431X Co Install & Mtce field Install	0.0833	0.1000	(0.0167)
Disconnect	0.0250	0.0500	(0.0250)
C&T 4AXX ACAC Install	0.0000	0.7350	(0.7350)
Disconnect	0.0000	0.0000	0.0000
C&T 470X Circuit Provision Grp Install	0.3233	0.2150	0.1083
Disconnect	0.0333	0.0000	0.0333
C&T 3A2X Ntwk PlugIn Admin Install	0.0140	0.0140	0.0000
Disconnect	0.0000	0.0000	0.0000
Facilities Assignment Install	0.0890	0.0000	0.0890
Disconnect	0.0000	0.0000	0.0000
CO Install, Maint & Adm-Software Install	0.0667	0.0000	0.0667
Disconnect	0.0000	0.0000	0.0000
Specil Services Coord & Test Install	0.7350	0.0000	0.7350
Disconnect	0.0000	0.0000	0.0000
	2.2679	2.529	0.2611)

### **Audit Disclosure 3**

**Subject: Provisioning Tasks Involved in the Cost Studies Filed by BellSouth (DDC-1).**

**Statement of Facts:** One of staff's objectives in this audit was to identify the duplicate charges for migrating a customer under the four scenarios identified in issue 8 discussed in audit disclosure 1.

I. In order to do this we interviewed the BellSouth subject matter experts (SMEs) to detail the tasks involved in each work center listed in DDC-1. When asked what tasks would be duplicated when a loop and port were ordered in combination, BellSouth subject matter experts indicated that none would be duplicated because they considered the migration of a loop and port to be resale. Their stand was the loop and port would have to be separated as discussed in audit disclosure 1.

Under these circumstances we could not determine which tasks were duplicate. However, BellSouth subject matter experts provided us with a detail list of the tasks involved in most work centers. These are attached to this disclosure as Exhibit 1 to this disclosure.

II. During the interviews we determined the following information regarding certain times used to calculate the costs on DDC-1 and used as a basis for the percent discounts on AJV-2.

#### **Address and Facility Inventory Work Center (AFIG)**

As the schedules are presented, there is a 20% fall out (mechanized to manual) built into the time for the address and facility inventory work center. This fallout is mostly from the orders where facilities are not compatible. The subject matter expert said that 50% of the 20% fallout occurs because of the separation of the loop and port.

#### **Outside Plant Engineering Work Center (OSE)**

In the interview with the BellSouth outside plant engineering subject matter expert, it was determined that the engineering involved for existing facilities and nonexisting facilities would need different times. This is not reflected in the times in the cost study. The times are listed in the DDC-1 schedules.

#### **Customer Point of Contact Work Center (ICSC)**

The BellSouth customer point of contact subject matter expert explained that the time included in the provisioning tasks in the cost studies was based on manual orders from the Alternative Local Exchange Companies.

It is our understanding from BellSouth personnel, that there is an electronic system called Electronic Data Interchange which allows the Alternative Local Exchange Companies to electronically order the elements. According the BellSouth personnel the Alternative Local Exchange Companies can order an unbundled loop and unbundled port at the same time with this system. The Company stated that they did not include the electronic orders in this study because the Commission said to address this in a separate docket. Right now the company stated that 90% of the orders are manual; and 10%

electronic from the Alternative Local Exchange Companies. Out of the 10% there is a 60% error rate that makes it necessary to handle the orders manually. The times used are listed in the DDC-1 schedules.

**Circuit Provisioning Group(CPG)**

According to the subject matter expert in the circuit provisioning group work center, the service order portion of the work would have to be performed for either resale or service to an Alternative Local Exchange Company. The subject matter expert said that if they did not have to touch the main distribution frame, they would not need the engineering function. The times for the circuit provisioning group work center are listed in the DDC-1 schedules.

As described by the subject matter expert, the engineering function for 4-Wire DS1 Loop and Port are different than the other three. The engineering function consists of data preparation, assignments, distribution and design. The total time for this provisioning task is listed in the DDC-1 schedules.

**Opinion:**

- I. We could not determine duplicate tasks from the interviews with the subject matter experts.
- II. A change in the times used in the cost studies would change the percents on Al Varner's Exhibit AJV-2 , dated January 29, 1998.

Address and facility inventory work center - If the loop and port were not separated, then the 50% of the 20% would not occur.

Outside plant engineering - If the time for engineering for existing facilities were lower or not included, then the percent on the AJV-2 would change.

Customer point of contact work center- The electronic filing in the future would reduce the manual time involved in this provisioning task.

Circuit provisioning group- If the circuit provisioning group did not need to touch the main distribution frame then the engineering function would not be needed.

**Exhibit I to Audit Disclosure 3**

INFORMATION PROVIDED BY BellSouth SUBJECT MATTER EXPERTS IN CONJUNCTION WITH TELEPHONE INTERVIEWS.

1. CENTRAL OFFICE OPERATIONS WORK CENTER (CO)
2. ACCOUNT CUSTOMER ADVOCATE CENTER WORK CENTER(ACAC)
3. OUTSIDE PLANT ENGINEERING (OSPE)
4. RECENT CHANGE LINE TRANS GP (RCMAG) WORK CENTR
5. ADDRESS AND FACILITY INVENTORY WORK CENTER (AFIG)
6. SPECIAL SERVICES INSTALLATION AND MAINTENANCE (SSIM)
7. SWITCH AND TRUNK TRANSLATIONS ( CTG)
8. CIRCUIT PROVISIONING GROUP (CPG)
9. LINE AND NUMBER ADMINISTRATION
10. WORK MANAGEMENT CENTER (WMC)
11. CUSTOMER POINT OF CONTACT (ICSC)
12. PLUG IN INVENTORY AND CONTROL SYSTEMS (PICS)

FEB 09 '98 08:58AM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98**

**Dan Stinson - Central Office Operations (UNE Loop & UNE Ports)**

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)
  - a. Retrieve work load for circuit from dispatch system Work Force Administration / Dispatch [n (WFA/DI).
  - b. Retrieve circuit Information from the Computer System for Mainframe OperationS (COSMOS).
  - c. Prewire circuit (make ready at cut point).
  - d. Place circuit In "Hold For Call" status in COSMOS.
  - e. Place COSMOS circuit information in "Hold For Call" file.
  - f. Complete wiring step in WFA/DI.
  - g. Receive go ahead call from Unbundled Network Element (UNE) center.
  - h. Cut circuit on Mainframe at UNE location (loop or port).
  - i. Test circuit with appropriate test set. (Different test are performed for digital vs. analog circuits).
  - j. Complete circuit order in COSMOS.
  - k. Complete load in WFA/DI.
  
2. Which of these tasks are similar to tasks done in the past?  
No difference.
  
3. What part of the task would not be done if two were done together?  
None.
  
4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only  
COSMOS retains information until circuit is disconnected (inventory and assignment system) WFA/DI work loads are purged after a 60 day period.
  
5. If there is a difference in times for the same tasks between the 1996 cost study (will be faxed to you) and the attached one.  
Times were adjusted to reflect work steps previously performed for UNEs are now shown for Collocation cross connect.

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6. If the task was not included in the 1996 cost study but is in the current one please explain why. N/A

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.



FEB 09 '98 08:51AM BELLSOUTH RIVERCHASE

## Edward Houppert UNE/ACAC Centers (All UNE Loops and All UNE Ports)

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)

### 2 Wire Analog Unbundled Loop Tasks

#### Frame Continuity Date

- The UNE Center receives engineering for Unbundled Loop
- The UNE Center scans related order field of engineering
- The UNE Center pulls related orders usually disconnect order and Add order for number portability.
- The UNE Center fills out cut sheet which details information of Unbundled Loop circuit Id with assignments that connect the loop to the CLEC, the F1 and F2 facilities that connect the loop to the End User. The cut sheet also contains the disconnect telephone number with the F1 and F2 facilities that connect the BellSouth telephone number to the End User. The cut sheet also shows the remote call forward relations between the BellSouth Telephone numbers and the CLEC telephone numbers.

**Note:** The steps above are necessary to determine cut point of circuit. The cut point could be outside if Integrated Digital Loop Carrier is involved, which would require a different F1 facility or the cut point could be in the Central Office if the entire local loop could be reused. Also the above steps are need to insure cutover accuracy and the minimization of End User outage during the conversion.

**Note:** In the case of a loop order worked with a port order the remote call forwarded information would be replaced with the unbundled port information.

- The UNE Center contacts the CLEC to negotiate the cutover time.
- The UNE Center prearranges the schedules of the BellSouth technicians needed for the negotiated cutover time.
- The UNE Center accesses remote test points of each unbundled loop and verifies continuity to the CLEC.
- The UNE Center request test assist from the C.O. to verify continuity from test point to main distributing frame.
- The UNE Center also has the C.O. validate the assignments of disconnect order. This step is necessary to eliminate disconnect assignment errors which if left unattended would cause service outages.

#### Plant Test Date/Due Date

- The UNE Center will contact the applicable BellSouth technicians needed for the cutover to insure schedule integrity
- The UNE Center will contact the CLEC at the pre-designated time to verify CLEC readiness to proceed with the conversion.
- The UNE Center has the BellSouth cutover technician verify that the BellSouth telephone number is functioning properly prior to the cutover. This step will prevent the cutover of a circuit in trouble.
- The UNE Center has the BellSouth cutover technician verify continuity from the cut point to the CLEC prior to cutover. This step will prevent cutting a working circuit to an arrangement that is in trouble.
- The UNE Center has the BellSouth cutover technician work the cutover.
- The UNE Center notes the time the cutover started in UNE Center log
- The UNE Center has the BellSouth cutover technician place test call from field side of cutover point.
- The UNE Center notes the time cutover is completed in the UNE Center log.
- The UNE Center notifies the CLEC that cutover is complete and offers cooperative testing.
- The UNE Center notes CLEC employee who accepts service in the UNE Center log.

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- The UNE Center compares cutover times to contract requirements.
- The UNE Center initiates waiver of applicable charges if contractual requirements exceeded.
- The UNE Center completes the order.

#### 4 Wire Analog Unbundled Loop Tasks

##### Frame Continuity Date

- The UNE Center receives engineering for Unbundled Loop
- The UNE Center scans related order field of engineering
- The UNE Center pulls related orders usually disconnect order.
- The UNE Center fills out cut sheet which details information of Unbundled Loop circuit i.d. with assignments that connect the loop to the CLEC, the F1 and F2 facilities that connect the loop to the End User. The cut sheet also contains the disconnect circuit i.d. with the F1 and F2 facilities that connect the BellSouth trunk to the End User.

**Note:** The steps above are necessary to determine cut point of circuit. Also the above steps are need to insure cutover accuracy and the minimization of End User outage during the conversion.

- The UNE Center contacts the CLEC to negotiate the cutover time.
- The UNE Center prearranges the schedules of the BellSouth technicians needed for the negotiated cutover time.
- The UNE Center accesses remote test points of each unbundled loop, with assistance from the C.O. verifies continuity from the test point to the CLEC Point of Interface
- The UNE Center accesses remote test points of each unbundled loop, with assistance from the C.O. verifies continuity from the test point to main distributing frame.
- The UNE Center also has the C.O. test the trunks of the disconnect order. This step is necessary to clear any troubles which if left unattended would cause service outages.

##### Plant Test Date/Due Date

- The UNE Center will contact the applicable BellSouth technicians needed for the cutover to insure schedule integrity
- The UNE Center will contact the CLEC at the pre-designated time to verify CLEC readiness to proceed with the conversion.
- The UNE Center has the BellSouth cutover technician verify that the BellSouth trunks are functioning properly prior to the cutover. This step will prevent the cutover of a circuit in trouble.
- The UNE Center has the BellSouth cutover technician work the cutover.
- The UNE Center notes the time the cutover started in UNE Center log
- The UNE Center accesses remote test points of each unbundled loop, with assistance from the C.O. verifies continuity from the test point to the end user side of the cut point.
- The UNE Center notes the time cutover is completed in the UNE Center log.
- The UNE Center notifies the CLEC that cutover is complete and offers cooperative testing.
- The UNE Center notes CLEC employee who accepts service in the UNE Center log.
- The UNE Center compares cutover times to contract requirements.
- The UNE Center initiates waiver of applicable charges if contractual requirements exceeded.
- The UNE Center completes the order.

#### 2 Wire ISDN Unbundled Loop Tasks

##### Frame Continuity Date

- The UNE Center receives engineering for Unbundled Loop
- The UNE Center scans related order field of engineering
- The UNE Center pulls related orders usually disconnect order and Add order for number portability.
- The UNE Center fills out cut sheet which details information of Unbundled Loop circuit Id with assignments that connect the loop to the CLEC, the F1 and F2 facilities that connect the loop to the

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**End User.** The cut sheet also contains the disconnect telephone number with the F1 and F2 facilities that connect the BellSouth telephone number to the End User. The cut sheet also shows the remote call forward relations between the BellSouth Telephone numbers and the CLEC telephone numbers.

**Note:** The steps above are necessary to determine cut point of circuit. The cut point could be outside if Intergrated Digital Loop Carrier is involved, which would require a different F1 facility or the cut point could be in the Central Office if the entire local loop could be reused. Also the above steps are need to insure cutover accuracy and the minimization of End User outage during the conversion.

**Note:** In the case of a loop order worked with a port order the remote call forwarded information would be replaced with the unbundled port information.

- The UNE Center contacts the CLEC to negotiate the cutover time.
- The UNE Center prearranges the schedules of the BellSouth technicians needed for the negotiated cutover time.
- The UNE Center request test assist from the C.O. to verify continuity from CLEC Point Of Interface to main distributing frame.
- The UNE Center also C.O. validate the assignments of disconnect order. This step is necessary to eliminate disconnect assignment errors which if left unattended would cause service outages.

#### **Plant Test Date/Due Date**

- The UNE Center will contact the applicable BellSouth technicians needed for the cutover to insure schedule integrity
- The UNE Center will contact the CLEC at the pre-designated time to verify CLEC readiness to proceed with the conversion.
- The UNE Center has the BellSouth cutover technician verify that the BellSouth telephone number is functioning properly prior to the cutover. This step will prevent the cutover of a circuit in trouble.
- The UNE Center has the BellSouth cutover technician verify continuity from the cut point to the CLEC prior to cutover. This step will prevent cutting a working circuit to an arrangement that is in trouble.
- The UNE Center has the BellSouth cutover technician work the cutover.
- The UNE Center notes the time the cutover started in UNE Center log
- The UNE Center has the BellSouth cutover technician place test call from field side of cutover point.
- The UNE Center notes the time cutover is completed in the UNE Center log.
- The UNE Center notifies the CLEC that cutover is complete and coordinates applicable ISDN test with CLEC switch.
- The UNE Center notes CLEC employee who accepts service in the UNE Center log.
- The UNE Center compares cutover times to contract requirements.
- The UNE Center initiates waiver of applicable charges if contractual requirements exceeded.
- The UNE Center completes the order.

#### **4 wire ISDN DS1 Loop**

#### **Frame Continuity Date**

- The UNE Center scans related order field of engineering
- The UNE Center pulls related orders.
- The UNE Center contacts the CLEC to negotiate the cutover time.
- The UNE Center prearranges the schedules of the BellSouth technicians needed for the negotiated cutover time.
- The UNE Center accesses remote test point of the unbundled loop, with assistance from the C.O. runs a DS1 Test to a loop toward the End User.
- The UNE Center accesses remote test point of the unbundled loop, with assistance from the C.O. runs a DS1 test to a loop at the Point of Interface toward the CLEC.

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**Plant Test Date/Due Date**

- The UNE Center will contact the applicable BellSouth technicians needed for the cutover to insure schedule integrity
- The UNE Center will contact the CLEC at the pre-designated time to verify CLEC readiness to proceed with the conversion.
- The UNE Center will verify that the BellSouth DSI is functioning properly prior to the cutover. This step will prevent the cutover of a circuit in trouble.
- The UNE Center has the BellSouth cutover technician work the cutover.
- The UNE Center notes the time the cutover started in UNE Center log
- The UNE Center will run a pretest to the Loop Back Device at the End User Location.
- The UNE Center will run a pretest to a loop at the POI of the CLEC with assistance from the C.O.
- The UNE Center notes the time cutover is completed in the UNE Center log.
- The UNE Center notifies the CLEC that cutover is complete and offers end to end cooperative testing.
- The UNE Center notes CLEC employee who accepts service in the UNE Center log.
- The UNE Center compares cutover times to contract requirements.
- The UNE Center initiates waiver of applicable charges if contractual requirements exceeded.
- The UNE Center completes the order.

**2 and 4 wire non-designed Unbundled Port Tasks**

- The UNE Center has minimal involvement with non-designed Unbundled Ports

**2 wire ISDN Port Tasks****Frame Continuity Date**

- The UNE Center scans related order field of engineering
- The UNE Center pulls related orders.
- The UNE Center contacts the CLEC to negotiate the cutover time.
- The UNE Center prearranges the schedules of the BellSouth technicians needed for the negotiated cutover time.
- The UNE Center request test assist from the C.O. to verify continuity from main distributing frame to collocation space for voice capabilities
- The UNE Center will also have the C.O. complete data circuit switch test
- The UNE Center will also have the C.O. complete D packet test.
- The UNE Center also has C.O. validate the assignments of disconnect order. This step is necessary to eliminate disconnect assignment errors which if left unattended would cause service outages.

**Plant Test Date/Due Date**

- The UNE Center will contact the applicable BellSouth technicians needed for the cutover to insure schedule integrity
- The UNE Center will contact the CLEC at the pre-designated time to verify CLEC readiness to proceed with the conversion.
- The UNE Center has the BellSouth cutover technician verify that the BellSouth telephone number is functioning properly prior to the cutover. This step will prevent the cutover of a circuit in trouble.
- The UNE Center has the BellSouth cutover technician verify continuity from the cut point to the CLEC prior to cutover. This step will prevent cutting a working circuit to an arrangement that is in trouble.
- The UNE Center has the BellSouth cutover technician work the cutover.
- The UNE Center notes the time the cutover started in UNE Center log
- The UNE Center has the BellSouth cutover technician place test call from field side of cutover point.
- The UNE Center notes the time cutover is completed in the UNE Center log.
- The UNE Center notifies the CLEC that cutover is complete and offers cooperative testing.
- The UNE Center notes CLEC employee who accepts service in the UNE Center log.
- The UNE Center compares cutover times to contract requirements.
- The UNE Center initiates waiver of applicable charges if contractual requirements exceeded.
- The UNE Center completes the order.

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**4 Wire ISDN DS1 Port****Frame Continuity Date**

- The UNE Center scans related order field of engineering
- The UNE Center pulls related orders.
- The UNE Center contacts the CLEC to negotiate the cutover time.
- The UNE Center prearranges the schedules of the BellSouth technicians needed for the negotiated cutover time.
- The UNE Center accesses remote test points of the unbundled port, with assistance from the C.O. runs a DS1 test to a loop at the Point of Interface toward the CLEC.

**Plant Test Date/Due Date**

- The UNE Center will contact the applicable BellSouth technicians needed for the cutover to insure schedule integrity
- The UNE Center will contact the CLEC at the pre-designated time to verify CLEC readiness to proceed with the conversion.
- The UNE Center will verify that the BellSouth DS1 is functioning properly prior to the cutover. This step will prevent the cutover of a circuit in trouble.
- The UNE Center has the BellSouth cutover technician work the cutover.
- The UNE Center notes the time the cutover started in UNE Center log
- The UNE Center accesses remote test point of the unbundled port, with assistance from the C.O. will run a pre-test to a Loop at the POI of the CLEC.
- The UNE Center notes the time cutover is completed in the UNE Center log.
- The UNE Center notifies the CLEC that cutover is complete and offers cooperative testing.
- The UNE Center notes CLEC employee who accepts service in the UNE Center log.
- The UNE Center compares cutover times to contract requirements.
- The UNE Center initiates waiver of applicable charges if contractual requirements exceeded.
- The UNE Center completes the order.

2. Which of these tasks are similar to tasks done in the past?

These task steps are similar to task steps performed for access circuits.

3. What part of the task would not be done if two were done together?

In the answer to question one coordination steps are outlined for the Unbundled Ports and the Unbundled Loops. If the port and loop were worked together they could be coordinated together.

4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

The UNE Center uses the Work Force Administration and Control (WFA/C) to record tasks.

5. Is there is a difference in times for the same tasks between the 1996 cost study (will be faxed to you) and the attached one.

Original 2 wire analog loop cost base on Subject Matter Experts experince related to BellSouth 2 wire circuits. The new 2 wire analog cost are based on expected time coordinating and testing with CLECs.

Original 4 wire analog loop cost base on Subject Matter Experts experince related to BellSouth 2 wire circuits. The new 4 wire analog cost are based on expected time coordinating and testing with CLECs.

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Original 2 wire ISDN cost based on Subject Matter Expert's experience related to the BellSouth ISDN activities. The new ISDN cost are based on expected time spent coordinating and testing with CLECs.

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

No new tasks included in current study.

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

FEB 09 '98 08:54AM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98  
MIKE ZITZMAN OSPE (ALL UNE LOOPS)**

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)

- A. Receipt of SO fallout in SAC
- B. Order is reviewed for reason
  - CFA assignments wrong
  - Facilities not compatible with UNE
    - Integrated
    - Not conditioned
    - ADSL/HDSL
    - No Facilities
- C. If needed request for job sent to Engineers
  - OSPE issues job
- D. If existing facilities can be used SAC assigns.
- E. New Facilities reserved in LFACS
- F. Input makeup if needed
- G. Input answer in RELOG and release.

2. Which of these tasks are similar to tasks done in the past?

All of the functions above are identical to those done in the past with two exceptions:

- a. CFA assignments are new to the process due to the requirement to connect the facility to the collocation space.
- b. Fallout due to integrated carrier incompatibility is new to the process due to the inability to hand off an integrated loop to the collocation space.

3. What part of the task would not be done if two were done together?

Since OSPE does not deal with ports, there would be no difference to the work content if both loop and port orders are done together.

4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

FEB 09 '96 08:55AM BELLSOUTH RIVERCHASE

**RELOG and LFACS**

5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

Additional time was included in the new study for installation time for 2W/4W analog loops due to the increased fallout due to CFA assignments and integrated carrier conflicts.

Time was decreased for 2W ISDN due to elimination of Service Inquiry for ISDN.

Time shows an increase for DS1 Digital loop disconnects. It appears the fallout factor was not applied to the time required for the task.

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

The same tasks were included in both studies.

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.



FEB 09 '98 08:55AM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98**

**Responses for RCMAG UNE PORT and PORT/LOOP Combinations (by Frank Eberle and Dennis Duffy)**

Further requests related to item NO. 7 dated January 30, 1998

Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)

- A. The Line Translations Specialist (LTS) in the RCMAG receives the service order via the MARCH/K2 LAN setup (received from SOAC)
- B. The LTS analyzes the service order for contents and correctness to establish next course of action
- C. If order is okay, the LTS manual types a recent change message in the MARCH system to provision the service (software wise) in the switch - they input the line recent change messages
- D. If the order is incorrect or if errors occur in the provisioning process, the LTS either corrects the problem or refers the problem to the appropriate department for resolution

2. Which of these tasks are similar to tasks done in the past?

These tasks are all similar to functions performed in the past

3. What part of the task would not be done if two were done together?

No tasks would be eliminated if they were done together (the provisioning methods and functions performed are the same regardless of whether the service order requests a PORT or a PORT/LOOP combination. The RCMAG is not involved in the LOOP provisioning)

4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

MARCH and the K2 system

5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

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No difference

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

It is included in both

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

FEB 10 '98 38:47AM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/88  
SHIRLEY ABTS AFIG UNE LOOPS**

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

**1. Explain each task (what does the task entail and why?)**

- A. Receipt of SO fallout in AFIG**
- B. Order is reviewed for reason**
  - CFA assignments wrong
  - Facilities are not compatible with UNE
    - Integrated
    - Not conditioned
    - No Facilities

**Example: 1.**

- a. In cases of facilities not compatible such as Integrated the AFIG receives a call from the CPG . The Facility Assignment clerk runs a Cable Pair report to find alternate facilities.**
- b. If alternate facilities are found clerk does a Change Facility transaction in FACS and reassigns order**
- c. If no alternate facilities are found the order is sent to Engineering for resolution**
- d. When engineer releases order with available facilities clerk clears held status and assigns order. If engineer answers with side door port then Line and number is involved (this is also part of AFIG). The OE must be unassembled from the cable pair and post ed in LFACS and order released.**

**Example 2.**

The CFA assignments are wrong .

- a. Working cable pair**
  - clerk either sends error to LCSC or calls depending on due date of service order
- b. Collocation pr ID incorrect**
  - clerk either sends error to LCSC or calls depending on due date on service order.
- c. Collocation not built in LFACS**
  - clerk PF's to engineering
  - posts to LFACS via form from engineering
  - clerk clears held status and reprocesses order

FEB 10 '99 08:47AM BELLSOUTH FIVERCHASE

**Example 3:**

**Conditioning incorrect at end users address**

- a. Clerk PF's to engineer
- b. clerk post LFACS via form provided by engineer
- c. clerk clears held status and reprocesses order.

**Example 4:**

**No facilities**

- a. clerk PF's to engineer
- b. clerk posts facilities via form when received from engineer.
- c. clerk releases held status and reprocesses order.

2. Which of these tasks are similar to tasks done in the past?  
All of the functions are identical to those done in the past with two exceptions:
  - a. CFA assignments are new to the process due to the requirement to connect the facility to the collocation space.
  - b. Fallout due to integrated carrier incompatibility is new to the process due to the inability to hand off an integrated loop to the collocation space
3. What part of the task would not be done if two were done together?  
No difference
4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only
  - LFACS
  - COSMOS
  - SOAC
  - SOCS
  - RELOG
5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.
 

Additional time was included in the new study due to increased fallout and manual handling on CFA assignments and integrated carrier conflicts.
6. If the task was not included in the 1996 cost study but is in the current one please explain why.

**It is included in both**

7. **What would be different for a migration in the old cost study?**

**THIS COST STUDY DID NOT ADDRESS MIGRATION.**

8. **What would be different for a migration in the new cost study?**

**THIS COST STUDY DID NOT ADDRESS MIGRATION.**

FEB 10 '98 08:48AM BELLSOUTH RIVECHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/09/98**

**MIKE HULSEY SSI&M (ALL UNE LOOPS)**

Further requests related to item NO.7 dated January 30, 1998

Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)

- A. Receipt of the service order via WFA-DO and review
- B. Obtain any equipment or related items that may be necessary for completion of order.
- C. Travel to Cross Box or customer premises as necessary.
- D. Install drop if necessary.
- E. Install network terminating wire.
- F. Install Network Channel Terminating Equipment
- G. Set up and perform appropriate tests as required by the parameters of the tariffed service.
- H. Resolve any problems that may arise.
- I. Close out service order via WFA-DO or direct to test center.

2. Which of these tasks are similar to tasks done in the past?

These tasks are very similar to tasks performed in the past, except that two wire service is not residential rather designed Special Services.

3. What part of the task would not be done if two were done together.?

Only task that would not be done is the travel time removed for the second order.

**NOTE BY E. LANDRY: THIS COMMENT APPLIES TO ADDITIONAL ITEMS ON THE SAME ORDER. IT WOULD NOT BE APPLICABLE TO A LOOP AND PORT COMBINATION SINCE MR. HULSEYS WORK IS ONLY ON THE LOOP PART OF THIS ISSUE.**

4. What records are used to record the tasks, e.g. for service order we were told

WFA-DO = Results recorded by the test center today.

5. If there is a difference in times for the same tasks between the 1996 cost study (will be faxed to you) and the attached one.

Much more complexity is involved in designed specials, where in the past some of these were POTS.

FEB 10 '98 08:49AM BELLSOUTH RIVERCHASE

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

Strictly based on complex services (No tasks included in 96 are in 97).

**NOTE BY E. LANDRY: THE INITIAL TIME STUDY LOOKED AT THESE AS BEING SIMPLER SERVICES. HOWEVER EXPERIENCE WITH THE ALECS INDICATED THAT THE PROCESS, COORDINATION STEPS, AND REQUIRED LEVEL OF TURN-UP WERE MORE COMPLEX THAN THE INITIAL COST STUDY EXPECTED.**

7. What would be different for a migration in the old cost study?  
This cost study did not address migration
8. What would be different for a migration in the new cost study?  
This cost study did not address migration.

FEB 09 '98 12:12PM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98  
DEBBIE SWINT SWITCH AND TRUNK TRANSLATIONS**

Further requests related to item NO. 7 dated January 30, 1998

Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

**RESPONSE FOR Switch & Trunk Based Translations (CTG)**

1. Explain each task (what does the task entail and why?)
  - a. Receipt of Firm Order Document (Paper) from Service Consultant via FAX by the Electronic Technician.
  - b. Verification/Review with Service Inquiry ( initial manual service request) for assignments and feature changes. Review of WORDDOC generated by CPG for additional information required to provision. At this time any assignment discrepancies would be referred for resolution to the appropriate group.
  - c. Building of software translations in mechanized input system ( Customer Group, necessary routing, applicable features and special routing associated.)
  - d. Verification and manual input of software data into switch those items that cannot be input via item c.
  - e. Call through testing with BRC (Business Repair Center) on PTD(Plant Test Date) when applicable
  
2. Which of these tasks are similar to tasks done in the past?
  - a. These tasks are all similar to functions performed in the past.
  
3. What part of the task would not be done if two were done together? No tasks would be eliminated to provision a 4W ISDN DS1 port or port/loop combo; the Complex Translations Group would not be involved on a loop only order.
  
4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only
  - a. TIRKS -
  - b. MTS (Mechanized Translation System) Front end input to switch



FEB 09 '92 12:13PM BELLSOUTH RIVERCHASE

5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

None

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

None

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

FEB 09 '99 02:03PM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98**

**2-Wire Analog Loop, 2-W ISDN Digital Loop, 4-W Analog Loop - Sharron Smith**

Further requests related to item NO. 7 dated January 30, 1998

Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)

***Service Order- CPG - Order logging via SOAC/TIRKS. Log service order in TIRKS - SOAC logging Mechanically. If the service order does not log mechanically a RMA (request for manual assistance) occurs.***

***RMA's are handled manually.***

***RMA's could occur with incorrect circuit IDs, incorrect CFAs, incorrect address (not all inclusive). Research must be done to resolve the problem.***

***Engineering - CPG- Circuit design preparation , Includes but is not limited, to retrieval of local loop facilities, assignment of interoffice facilities and necessary equipment to meet design parameters, designing circuit, assigning test points, distribution of the DLR and the WORD document, ordering of plug-ins.***

2. Which of these tasks are similar to tasks done in the past?

***All of the tasks involved will occur for any special service designed circuit.***

3. What part of the task would not be done if two were done together?

***None, there will be one LSR but two separate service orders will be issued***

4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

***SOAC /TIRKS Tandem (Input Into the system) —***

***GOC module of the TIRKS system (logging service order)***

***E1/F1 modules of the TIRKS system (assigning facilities and equipment)***

***C1 module of TIRKS (unique record Inventory In system)***

***DIST module of TIRKS (distributes DLR and WORD to field forces)***

FEB 09 '98 02:03PM BELLSOUTH FIVERCHASE

**TIRKS/PICS interface (ordering plug-ins).**

5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

***There is probably a 5% reduction in the cost from 1996 to 1997. This is due to mechanization of some of the design steps. PRO-CDS models were requested and built to allow some flow/through of these circuits.***

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

***All tasks for 1996 and 1997 remained constant.***

7. What would be different for a migration in the old cost study?

**THIS COST STUDY DID NOT ADDRESS MIGRATION.**

8. What would be different for a migration in the new cost study?

**THIS COST STUDY DID NOT ADDRESS MIGRATION.**

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98**

**2-W Analog Port, 2-W ISDN Port, 4-W analog Port - Sharron Smith- CPG**

Further requests related to item NO. 7 dated January 30, 1998

Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)

***Service Order- CPG - Order logging via SOAC/TIRKS. Log service order in TIRKS - SOAC logging Mechanically. If the service order does not log mechanically a RMA (request for manual assistance) occurs.***

***RMA's are handled manually.***

***RMA's could occur with incorrect circuit IDs, incorrect CFAs, incorrect address (not all inclusive). Research must be done to resolve the problem.***

***Engineering - CPG- Circuit design preparation , includes but is not limited, assignment of interoffice facilities and necessary equipment to meet design parameters, designing circuit, assigning test points, distribution of the DLR and the WORD document, ordering of plug-ins.***

2. Which of these tasks are similar to tasks done in the past?

***All of the tasks involved will occur for any special service designed circuit.***

3. What part of the task would not be done if two were done together?

***None, there will be one LSR but two separate service orders will be issued***

4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

***SOAC /TIRKS Tandem (input into the system)***

***GOC module of the TIRKS system (logging service order)***

***E1/F1 modules of the TIRKS system (assigning facilities and equipment)***

***C1 module of TIRKS (unique record inventory in system)***

***DIST module of TIRKS (distributes DLR and WORD to field forces)***

***TIRKS/PICS interface (ordering plug-ins).***

FEB 09 '98 02:04PM BELLSOUTH FIVEPCHASE

5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

*I am not aware of any differences in times for ports.*

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

*All tasks for 1996 and 1997 remained constant.*

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

FEB 09 '98 22:05PM BELL SOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98  
BRIAN BLANCHARD CPG (DS1 UNE LOOP AND UNE PORT)**

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all  
inclusive.

**Response for CPG Functions - 4 wire DS1 Digital Loop (By F. Brian Blanchard)**

1. Explain each task (what does the task entail and why?)

**Service Order** - Each loop requires a service order to establish a Circuit Layout Order number into the Generic Order Control (GOC) module of the TIRKS<sup>®</sup> System. Orders that do not log mechanically thru the Service Order Analysis and Control (SOAC)/TIRKS interface must be manually logged. Incorrect CFA assignments, incorrect Network Channel (NC) and Network Channel Interfaces (NCI), incorrect street addresses, and other incorrect design affecting fields on the Local Service Request (LSR) or Access Service Request (ASR) will cause the service order to fallout for manual handling. Since all of the circuits are on one order, the Additional time does not apply.

**Engineering** - This function consists of circuit design data preparation, assignment of local loop facilities, assignment of interoffice facilities, and the design and distribution of the Work Order Records and Details (WORD) document used by the field forces to establish the service. Circuit design data preparation includes verification of NC/NCI combinations and other design affecting criteria that must be placed in the C1-INV module of TIRKS to assist with choosing the correct facility assignments and design criteria. Local Facilities for DS1 services are assigned by the AFIG and engineered by OSPE. Incorrect addresses provided by the customer hinder this process. The CPG must take this information and enter the assignments into TIRKS. This is a manually intensive process. After Local Facilities are entered, interoffice facilities are assigned from spare inventory using the Planning Provisioning Interface (PPI). Incorrect Common Language Location Identification (CLLI) Codes provided by the customer hinder the assignment of interoffice facilities. After all of the facilities are assigned, the Programmable Circuit Design System (PRO-CDS) is used to choose a particular design. Incorrect NC/NCI provided by the customer and incorrect facility combinations cause fallout for PRO-CDS. After the design is successful, either mechanical or manual, the WORD document is distributed to downstream field forces.

2. Which of these tasks are similar to tasks done in the past?

The tasks performed are the same tasks performed for Special Access DS1 and Non-Access DS1.

3. What part of the task would not be done if two were done together?

This is not applicable for a DS1. If the DS1 is not delivered to an end user customer and is instead delivered to a Collocation arrangement, then the OSPE local loop facility is replaced with a T1TIE Connecting Facility Assignment (CFA) provided by the customer.

4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

SOAC/TIRKS Tandem  
GOC module of the TIRKS system  
E1/F1 modules of the TIRKS system  
C1 module of the TIRKS system

5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

I am not aware of any differences.

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

All tasks are identified in each study.

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

FEB 29 '98 02:06PM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98**

**ELAINE BILLIE LINE AND NUMBER ADMINISTRATION (ALL UNE PORTS)**

Further requests related to item NO. 7 dated January 30, 1998

Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

1. Explain each task (what does the task entail and why?)
  - A. Monitor Spare OEs daily to ensure OE availability for service order assignment. (on-going)
  - B. Take corrective action for any OE Equipment Classes of Service in which there are spare OE shortages. (on-going)
  - C. Receive Request for Manual Assistance when OE cannot be assigned. Ensure OE is made available for service order assignment.
  
2. Which of these tasks are similar to tasks done in the past?
 

**All are similar to the functions performed in the past.**
  
3. What part of the task would not be done if two were done together?
 

**None would be eliminated if they were done together.**
  
4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only
 

**Central Office System for Main Frame Operations (COSMOS)**
  
5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.
 

**No Difference.**
  
6. If the task was not included in the 1996 cost study but is in the current one please explain why.
 

**It is included in Both.**



FEB 09 '99 02:07PM BELLSOUTH RIVERCHASE

7. What would be different for a migration in the old cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

8. What would be different for a migration in the new cost study?

THIS COST STUDY DID NOT ADDRESS MIGRATION.

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98  
BOB CARLTON WMC UNE LOOPS**

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all inclusive.

- 1. Explain each task (what does the task entail and why?)

The WMC is responsible for reviewing each order that requires a dispatch to insure all necessary information is available. Orders are priced and routed to the appropriate work group. All order, both dispatch and non-dispatch orders are completed in the WMC to insure appropriate billing.

- 2. Which of these tasks are similar to tasks done in the past?

WMC responsibilities regarding order review, loading and completions have not changed. In most cases increased FIDS and USOCS associated with unbundled services and the service order process.

- 3. What part of the task would not be done if two were done together?

None

- 4. What records are used to record the tasks. e.g. for service order we were told EXACT and DOE. For DDC-1 only

SOCS, WFA, TIRKS, LMOS

- 5. If there is a difference in times for the same tasks between the 1996 cost study(will be faxed to you) and the attached one.

Yes, in most cases the times have been reduced. This is related to improved decision tables in WFA to improve flow through.

- 6. If the task was not included in the 1996 cost study but is in the current one please explain why.

No

- 7. What would be different for a migration in the old cost study?

FEB 12 '93 12:58PM BELLSOUTH RIVERCHASE

**None**

**THIS COST STUDY DID NOT ADDRESS MIGRATION.**

**8. What would be different for a migration in the new cost study?**

**None**

**THIS COST STUDY DID NOT ADDRESS MIGRATION.**

FEB 12 '98 12:55PM BELLSOUTH RIVERCHASE

**FPSC DOCKET 971140-TP  
AUDIT ITEM 7 QUESTIONS FOR SMEs  
02/04/98**

Further requests related to item NO. 7 dated January 30, 1998  
Here is a list of questions that need to be answered by the SME's. These are not all  
inclusive.

**RESPONSES FOR LCSC UNE LOOP FUNCTIONS - by Paula Murphy  
RESPONSES FOR LCSC UNE PORT FUNCTIONS - by Vickie Beachley**

1. Explain each task (what does the task entail and why?)
  - A. LCSC receives the LSR from the CLEC via FAX.
  - B. The LCSC Service Representative reviews the LSR for accuracy and completeness.
  - C. The LCSC Service Representative manually inputs the order into the service ordering system:
    - Designed Loops: Orders issued using EXACT and SOCS.
    - Non-designed Loops and all Ports: Orders issued using DOE and SOCS.
  - D. The Service Representative releases orders which flow downstream for provisioning.
  
2. Which of these tasks are similar to tasks done in the past?
  - Designed Loop orders are similar to the functions performed in the access environment.
  - Non-designed Loops and all Port services are similar to functions performed in the Retail environment.
  
3. What part of the task would not be done if two were done together?
 

None would be eliminated if they were done together.
  
4. What records are used to record the tasks, e.g. for service order we were told EXACT and DOE. For DDC-1 only

EXACT and DOE

FEB 10 '99 12:59PM BELL SOUTH RIVERCHASE

5. If there is a difference in times for the same tasks between the 1996 cost study (will be faxed to you) and the attached one.

No difference.

6. If the task was not included in the 1996 cost study but is in the current one please explain why.

Both Loops and Ports were included.

7. What would be different for a migration for DDC 1?

Migration was not addressed in this study.

8. What would be different for a migration for DDC 7, 8 & 9?

Migration was not addressed in this study.

FEB 10 '93 12:59PM BELLSOUTH RIVERCHASE

### **TOM ALEXANDER - PLUG IN INVENTORY AND CONTROL SYSTEM (PICS)**

Following are the answers to questions which are applicable:

1. Q. Explain each task  
A. Initiating shipments of equipment to field locations to establish and maintain customer service.
2. Q. Which of these tasks are similar to tasks done in the past?  
A. All
3. Q. What part of the task would not be done if two were done together?  
A. None
4. Q. What records are used to record the tasks?  
A. PICS/DCPR; SIMM; Accumulator
5. Q. Differences in times for same tasks?  
A. The reduction in the PICS time estimate for 4-wire DSL digital loop can be attributed to: 1) Order receipt mechanization; and 2) System integration. These two factors have reduced the order order processing time by increasing mechanized flow through of equipment orders.

**Audit Disclosure 4**

**Subject: Loop/Port Combinations Performed During 1997**

**Statement of Facts:** Staff auditors requested the company provide documentation for all the loop and port combinations done during 1997 for the following elements:

- 2 wire analog loop and port
- 2 wire ISDN loop and port
- 4 wire analog loop and port
- 4 wire DS1 Digital loop and port

The documentation requested was to include the date of each job, records that would show who worked on the particular task from inception of the job to the end of the job, and the hours involved for the tasks.

The company stated that approximately 37 jobs were performed during 1997. Staff requested this information on February 2. The due date was February 5. On February 11, the auditors received some documentation related to approximately 20 telephone numbers. The information received was:

- A printout with the telephone number, customer name, ALEC indication and other company codes.
- Local Service Request Form
- End User information Form
- Port Service information Form
- Loop Service information Form
- Directory Listing Request Form

**Opinion:** The staff auditor telephoned Bellsouth representatives on February 11 and 12 to inquire who would explain the information received in order to determine if the information would meet the auditor's request. On February 13, the staff auditor was contacted by Bellsouth to set up a meeting with personnel for explanations, however, due to the company's delay, the auditor did not have time.

**Disclosure No. 5**

**Subject: Reconciliation of the Payroll Costs from BellSouth's Paradox Program to Supporting Documentation for Payroll Costs in DDC-1 Schedules.**

**Statement of Fact:** DDC-1 schedules were calculated using payroll rates based on 1995 payroll dollars and inflated for two years. Most of these rates were based on payroll for nine states. For certain work centers, the company removed different states from the calculation. A list of each work center, job function codes and states used to determine the payroll dollars as prepared by the company is attached as exhibit 1 to this disclosure. Time limit precluded staff from determining the reason for using different states.

**Opinion:** Using different states for payroll rates could result in inconsistency. However, without analyzing the reasons for using different states, we cannot determine if inconsistency exist.



**SECTION 5  
RECONCILIATION EXCEPTIONS**

For some Plant Work Centers, Cost Groups and the PICS Engineering Force Group, adjustments were made to the summarized record data in order to develop representative labor rates for the BellSouth region. As an example, the PICS (341X, 3A2X) Engineering work function is primarily centralized in Louisiana; however, a minor amount of dollars and hours are reflected in some of the other states. Therefore, only Louisiana data was included in the development of the regional labor rates for this function. Following is a inventory of all Plant Work Centers, Engineering Force Groups, and Cost Groups with notations reflecting those where some type of adjustment was required:

<u>PLANT WORK CENTERS</u>	<u>JFC</u>	<u>ADJUSTMENTS</u>
ADDRESS & FACILITY INVENTORY (AFIG)	400X 4M1X	NONE
INSTALLATION & MTCE CENTER (IMC)	401X	FL, MS, NC REMOVED FROM REGION
INSTALL & MTCE - POTS	410X	NONE
INSTALL & MTCE - SPEC SVCS (SSIM)	411X	NONE
OUTSIDE PLANT CONSTRUCTION (OSPC)	420X 421X	NONE
OUTSIDE PLANT ADMIN CENTER (OPAC)	424X	NONE
CABLE REPAIR TECHNICIAN (CRT)	422X 423X 425X 428X	NONE
CO INSTALL & MTCE FIELD-SWITCH EQUIP	430X	NONE
CO INSTALL & MTCE FIELD-CIRCUIT & FAC	431X	NONE
RECENT CHANGE LINE TRANSLATIONS (RCMAG)	4321 4N1X	FL, LA REMOVED FROM REGION
SWITCH & TRUNK BASED TRANSLATIONS	4320 4N2X	NONE
CO INSTALL, MTCE & ADMIN - SOFTWARE	4322 4323 4324	WRK FUNCTION IN GA, LA, TN ONLY
TRUNK & CARRIER GROUP (TCG)	4331 4342 473X 4N5X	NONE
NETWORK RELIABILITY CENTER (NRC)	4330 4341 4LXX	WRK FUNCTION IN NC, TN ONLY -HRS BASED ON TOTAL PROD DUE TO HIGH UNCLASS PROD HRS
PROACTIVE ANALYSIS & REPAIR CTR (PAR)	4332 4PXX	ONLY AL, FL, NC, SC, TN IN REGION CIRCUIT
PROVISIONING GROUP (CPG)	470X 4N4X	NONE
ACCESS CUSTOMER ADVOCATE CENTER (ACAC)	471X 4AXX	WRK FUNCTION IN AL&GA ONLY -HRS BASED ON TOTAL PROD DUE TO HIGH UNCLASS PROD HRS
EQUIPMENT BILLING ACCURACY CONT (EBAC)	472X 4N3X	SC REMOVED FROM REGION
BUSINESS REPAIR CENTER (BRC)	4BXX	SC REMOVED FROM REGION

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**PLANT WORK CENTERS continued****JFC****ADJUSTMENTS**

RESIDENCE REPAIR CENTER (RRC)

4RXX

GA, SC REMOVED FROM REGION-  
BENEFITS ADJUSTMENTS ON  
AL, KY, LA, MS, NC, TN

WORK MANAGEMENT CENTER (WMC)

4WXX

NONE

**ENGINEERING FORCE GROUPS****JFC****ADJUSTMENTS**

LAND AND BUILDINGS (FG10)

30XX 350X

NONE

NETWORK &amp; ENGINEERING PLANNING (FG20)

31XX 34XX 3AXX 3BXX

NONE

NETWORK PLUG-IN ADMINISTRATION (PICS)

341X 3A2X

WRK FUNCTION IN LA ONLY

OUTSIDE PLANT ENGINEERING (FG30)

32XX 358X

NONE

**COST GROUPS****JFC****ADJUSTMENTS**

CABS ACCOUNTING

1200

ADMIN CLER ADJUSTMENTS  
ADMIN CLER, DIRECT ADMIN  
ADJUSTMENTS

CUST POINT OF CONTACT-IC8C/LCSC

2300

POTS OPERATOR

2120

ADMIN CLER ADJUSTMENTS

DIRECTORY ASST OPERATOR

2940

NONE

COIN COLLECTOR

2800

ADMIN CLER, DIRECT ADMIN,  
PREM, OTH EMP ADJUSTMENTS  
ADMIN CLER ADJUSTMENTS

COLLECTIONS REP-RESIDENCE

2E40

ADMIN CLER ADJUSTMENTS

COLLECTIONS REP-BUSINESS

2840

ADMIN CLER ADJUSTMENTS

BUS OFC SVC REP-RESIDENCE

2E50 2E70

ADMIN CLER ADJUSTMENTS

BUS OFC SVC REP-BUSINESS

2850 2870

ADMIN CLER ADJUSTMENTS

COMPTROLLERS CLERICAL

1240 1250 1260 1270

ADMIN CLER ADJUSTMENTS

NETWORK SERVICES CLERICAL

2700 2730

ADMIN CLER, OTH EMP  
ADJUSTMENTS

52

CONFIDENTIAL

REDACTED

971140

Exhibit RRY - 2 (Page 1 of 4)



*All new time reference to Section 43 - All old time reference to Sect 44*

Nonrecurring Labor

Rate	Description	Work Center	JFC	Installation				Removal			
				Time	Old	Time	Old	Time	Old	Time	Old
<i>When loop and pool are ordered individually.</i>											
<b>3-Mile Analog Loop</b>											
FL A12	SERVICE ORDER	Customer Point Of Contact - ICSC	2000								
FL A12	SERVICE ORDER	Circuit Purchasing Group (CPG)	470K								
FL A12	SERVICE ORDER	Work Management Center (WMC)	2000K								
FL A12	SERVICE ORDER	Acc Cost Advance Ctr (ACAC)	471K								
FL A12	SERVICE ORDER	Install & Misc - Spec Buss (SBS)	411K								
FL A12	ENGINEERING	Address & Facility Inventory (AFI)	400K								
FL A12	ENGINEERING	Circuit Purchasing Group (CPG)	470K								
FL A12	ENGINEERING	Outside Plant Eng (OSE)	322K								
FL A12	CONNECT & TEST	CO Install & Misc Field - Ctl & Pwr	421K								
FL A12	CONNECT & TEST	Acc Cost Advance Ctr (ACAC)	471K								
FL A12	CONNECT & TEST	Install & Misc - Spec Buss (SBS)	411K								
FL A12	TRAVEL	Install & Misc - Spec Buss (SBS)	411K								
			<b>Total</b>								
<b>3-Mile DSX Signal Loop</b>											
FL A81	SERVICE ORDER	Customer Point Of Contact - ICSC	2000								
FL A81	SERVICE ORDER	Circuit Purchasing Group (CPG)	470K								
FL A81	SERVICE ORDER	Work Management Center (WMC)	2000K								
FL A81	SERVICE ORDER	Acc Cost Advance Ctr (ACAC)	471K								
FL A81	SERVICE ORDER	Install & Misc - Spec Buss (SBS)	411K								
FL A81	ENGINEERING	Address & Facility Inventory (AFI)	400K								
FL A81	ENGINEERING	Circuit Purchasing Group (CPG)	470K								
FL A81	ENGINEERING	Outside Plant Eng (OSE)	322K								
FL A81	CONNECT & TEST	Work Plug-In Admin (WPIA)	341K								
FL A81	CONNECT & TEST	CO Install & Misc Field - Ctl & Pwr	421K								
FL A81	CONNECT & TEST	Acc Cost Advance Ctr (ACAC) (SBC Ctr)	471K								
FL A81	CONNECT & TEST	Install & Misc - Spec Buss (SBS)	411K								
FL A81	CONNECT & TEST	Install & Misc - Spec Buss (SBS)	411K								
FL A81	TRAVEL	Install & Misc - Spec Buss (SBS)	411K								
			<b>Total</b>								
<b>4-Mile Analog Loop</b>											
FL A41	SERVICE ORDER	Customer Point Of Contact - ICSC	2000								
FL A41	SERVICE ORDER	Circuit Purchasing Group (CPG)	470K								

*PBC*

FEB 89 '98 08:24AM BELL SOUTH PIVOROSE

P.07

*R.2178*

*10/21/98*

①















DEVELOPMENT OF NONRECURRING COSTS  
4 WIRE DS1 DIGITAL GRADE LOOP

46-3

STATE: FLORIDA  
WORKPAPER: 750  
PAGE: 1 OF 1  
DATE: Aug-88

LEVEL 1988 - 1988

DIRECTLY ASSIGNED

	(A)		(B)		(C)	(D)		(E)		(F)		(G)	
	INSTALL WORKTIMES (HRS) FIRST	ADDL	DISCONNECT WORKTIMES (HRS) FIRST	ADDL		LEVELIZED LABOR RATE	INSTALL COST (A*(C) FIRST	ADDL	DISCONNECT COST (B*(C) FIRST	ADDL	DISCOUNTED DISCONNECT COST (E*(DF) FIRST	ADDL	(D+F)*(1+GR) TOTAL FIRST
1													
2													
3													
4													
5													
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40													

P23B01X 0001222

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2W analysis

Unbundled Exchange Ports  
Nonrecurring Costs - Summary

State: Florida  
Workpaper: 30  
Page: 1 of 1  
Date:

08/08/96

LN	Description	Source	Amount
1	Nonrecurring Cost - First		
2	Residential	WP31A, LN14	
3	Business	WP31A, LN30	
4	PBX	WP31B, LN14	
5			
6	Nonrecurring Cost - Additional		
7	Residential	WP32A, LN14	
8	Business	WP32A, LN30	
9	PBX	WP32B, LN14	
10			
11	RTU Fee, per Port <sup>1</sup>	WP34, LN10	
12			
13			
14			
15			
16			
17			
18			
19			
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29			
30	<sup>1</sup> Note: The RTU fee can be amortized over the economic life of the switch.		
31	This unit recurring equivalent is (WP34, LN16):		\$0.31
32			
33			
34			
35			

rounded  
44-1

44-1  
2W analysis

2W analysis

WP31A, LN14  
WP31B, LN14  
WP32A, LN14  
WP32B, LN14  
WP34, LN10

**Unbundled Exchange Ports  
 Nonrecurring Costs - First  
 Residence & Business**

*2W Ornelas*

State: Florida  
 Workpaper: 31A  
 Page: 1 of 1  
 Date: 08/09/96

LN	Description	Hours	46-3 Labor Rate	Inflation Factor (WP35, LN19)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	Residential						
2	Local Carrier Service Center (LCSC)						
3	Installation						
4	Disconnect						
5							
6	Line and Number Administration						
7	Installation						
8	Disconnect						
9							
10	CO Install, Maintenance & Administration -						
11	Installation						
12	Disconnect						
13							
14	Total Nonrecurring Cost - Residence						
15							
16							
17	Business						
18	Local Carrier Service Center (LCSC)						
19	Installation						
20	Disconnect						
21							
22	Line and Number Administration						
23	Installation						
24	Disconnect						
25							
26	CO Install, Maintenance & Administration -						
27	Installation						
28	Disconnect						
29							
30	Total Nonrecurring Cost - Business						
31							
32	Note:						
33	Function performed by Network Services Clerks						
34							
35							

*1-177*  
*10/10/96*  
*10/10/96*  
*10/10/96*

Unbundled Exchange Parts  
 Nonrecurring Costs - First  
 PBX

*2d analog*

State: Florida  
 Workpaper: 318  
 Page: 1 of 1  
 Date: 06/09/96

LN	Description	Hours	Labor Rate	Inflation Factor (WP35, LN19)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	PBX						
2	Local Carrier Service Center (LCSC)						
3	Installation						
4	Disconnect						
5							
6	Line and Number Administration						
7	Installation						
8	Disconnect						
9							
10	CO Install, Maintenance & Administration - Software						
11	Installation						
12	Disconnect						
13							
14	Total Nonrecurring Cost - PBX						
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
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31							
32	Note:						
33	Function performed by Network Services Clerical.						
34							
35							

*WP 101*  
*1-11-1*

Unbundled Exchange Ports  
 Nonrecurring Costs - Additional  
 Residence & Business

*2W Analog*

State: Florida  
 Workpaper: 32A  
 Page: 1 of 1  
 Date: 08/09/96

LN	Description	Hours	Labor Rate	Inflation Factor (WP35, LN18)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	Residence						
2	Local Carrier Service Center (LCSC)						
3	Installation						
4	Disconnect						
5							
6	Line and Number Administration <sup>1</sup>						
7	Installation						
8	Disconnect						
9							
10	CO Install, Maintenance & Administration - Software						
11	Installation						
12	Disconnect						
13							
14	Total Nonrecurring Cost - Residence						
15							
16							
17	Business						
18	Local Carrier Service Center (LCSC)						
19	Installation						
20	Disconnect						
21							
22	Line and Number Administration <sup>1</sup>						
23	Installation						
24	Disconnect						
25							
26	CO Install, Maintenance & Administration -						
27	Installation						
28	Disconnect						
29							
30	Total Nonrecurring Cost - Business						
31							
32	<sup>1</sup> Note:						
33	Function performed by Network Services Clerical.						
34							
35							

*12/1/01*  
*1/1/01*  
*1/1/01*

**Unbundled Exchange Ports  
Nonrecurring Costs - Additional  
PBX**

*2w analog*

State: Florida  
Workpaper: 328  
Page: 1 of 1  
Date: 08/09/98

LN	Description	Hours	Labor Rate	Inflation Factor (WP35, LN19)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	PBX						
2	Local Carrier Service Center (LCSC)						
3	Installation						
4	Disconnect						
5							
6	Line and Number Administration						
7	Installation						
8	Disconnect						
9							
10	CO Install, Maintenance & Administrative						
11	Installation						
12	Disconnect						
13							
14	Total Nonrecurring Cost - PBX						
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
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31							
32	<sup>1</sup> Note:						
33	Function performed by Network Services Clerical.						
34							
35							

*Handwritten notes and signatures:*  
 11-11-98  
 [Signature]  
 [Signature]

STATE OF FLORIDA  
COMMUNICATIONS SERVICES BOARD  
REGULATORY BUSINESS FORM  
RBR-00000001 (REV. 04/97)

**Summary of Costs**

State: Florida  
Workpaper: 10  
Page: 1 of 1  
Date: 08/09/96

Rate Element  
**2W ISDN Digital Port**

Monthly

Nonrecurring  
First

Nonrecurring  
Additional

**Usage**

Initial Minute  
Additional Conversation Minutes (per Minute)

*Handwritten mark*



**2W ISDN Digital Port**  
**Summary of Nonrecurring Costs**

State: Florida  
 Workpaper: 30  
 Page: 1 of 1  
 Date: 06/09/96

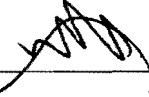
LN	Description	Source	Amount
1	Nonrecurring Cost - First	WP31, LN33	
2			
3	Nonrecurring Cost - Additional	WP32, LN33	
4			
5	RTU Fees <sup>1</sup>		
6	Volume Sensitive	WP22, LN112	
7	Volume Insensitive	WP22, LN113	
8			
9			
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30	<sup>1</sup> Note: The RTU Fees can be amortized over the economic life of the switch.		
31	These unit recurring equivalent fees have been added to the switching recurring costs.		
32	This sum is displayed on WP20, LN5.		
33			
34			
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APR 11 11:11

9  
1-10

**2W ISDN Digital Port**  
**Nonrecurring Costs - First**

State: Florida  
 Workpaper: 31  
 Page: 1 of 1  
 Date: 08/09/96

46-3  


LN	Description	Hours	Labor Rate	Inflation Factor (WPS3, LN19)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	Local Carrier Service Center (LCSC)						
2	Installation						
3	Disconnect						
4							
5	Circuit Provisioning Center (CPC)						
6	Installation						
7	Disconnect						
8							
9	Facilities Assignment (FACS)						
10	Installation						
11	Disconnect						
12							
13	CO Install & Maintenance - Circuit & Facility						
14	Installation						
15	Disconnect						
16							
17	Network Plug-in Administration (PICS)						
18	Installation						
19	Disconnect						
20							
21	CO Install, Maintenance & Administration - Software						
22	Installation						
23	Disconnect						
24							
25	Network Services Clerical (SOP89)						
26	Installation						
27	Disconnect						
28							
29	Special Services Coordinate & Test (SSC)						
30	Installation						
31	Disconnect						
32							
33	Total Nonrecurring	Sum(LN2..LN31)					
34							
35							

W/10/11/96  
 [Handwritten initials]

INTEGRITY BUSINESS FORMS, INC. 4875 WILSON ROAD, SUITE 100, WILSON, NC 27157-1000

2W ISDN Digital Port.  
Nonrecurring Costs -- Additional

State: Florida  
Workpaper: 32  
Page: 1 of 1  
Date: 08/09/96

LN	Description	Hours	Labor Rate	Inflation Factor (WP33, LN19)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	Local Carrier Service Center (LCSC)						
2	Installation						
3	Disconnect						
4							
5	Circuit Provisioning Center (CPC)						
6	Installation						
7	Disconnect						
8							
9	Facilities Assignment (FACS)						
10	Installation						
11	Disconnect						
12							
13	CO Install & Maintenance - Circuit & Facility						
14	Installation						
15	Disconnect						
16							
17	Network Plug-In Administration (PICS)						
18	Installation						
19	Disconnect						
20							
21	CO Install, Maintenance & Administration - Software						
22	Installation						
23	Disconnect						
24							
25	Network Services Clerical (SOP89)						
26	Installation						
27	Disconnect						
28							
29	Special Services Coordinate & Test (SSC)						
30	Installation						
31	Disconnect						
32							
33	Total Nonrecurring						Sum(LN2..LN31)
34							

*Handwritten signature/initials*

INTEGRITY BUSINESS FORMS, INC. 800-451-2025 FAX: 402-486-2025

**Summary of Costs**

State: Florida  
Workpaper: 10  
Page: 1 of 1  
Date:

08/09/96

Rate Element  
4W DS1 DID Port

Monthly

Nonrecurring  
First

Nonrecurring  
Additional

**Note:**  
Costs do not include establishing the first trunk group and groups of numbers.  
Nonrecurring costs do not include service activation

*[Handwritten signature]*

State: Florida  
Workpaper: 30  
Page: 1 of 1  
Date:

08/09/96

4W DS1 DID Port  
Nonrecurring Costs - Summary

LN	Description	Source	Amount
1	Nonrecurring Cost - First		
2			
3	Nonrecurring Cost - Additional		
4			
5			
6			
7			
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No disclosure outside BST w/o written agreement.

*[Handwritten signature]*  
08/16/96

INTERNET BUSINESS FORMS, INC. (800) 998-2800 FAX (800) 998-4800

4W DS1 DID Port  
Nonrecurring Costs - First

46-3

State: Florida  
Workpaper: 31  
Page: 1 of 1  
Date: 08/09/96

LN	Description	Hours	Labor Rate	Inflation Factor (WP34, LN19)	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	Local Carrier Service Center (LCSC)						
2	Installation						
3	Disconnect						
4							
5	Circuit Provisioning Center (CPC)						
6	Installation						
7	Disconnect						
8							
9	Network Services Clerical (SOP89)						
10	Installation						
11	Disconnect						
12							
13	Switching Control Center (SCC)						
14	Installation						
15	Disconnect						
16							
17							
18							
19							
20							
21	RTU Fees						
22							
23							
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29							
30	Total Nonrecurring						
31							
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Private/Proprietary. No disclosure outside BST w/o written agreement.

Exhibit RKY - 3 (Page 16 of 22)

10/16/96  
55193

STATE OF FLORIDA  
DEPARTMENT OF REVENUE  
TALLAHASSEE, FLORIDA 32399-0001

**4W DS1 DID Port  
Nonrecurring Costs - Additional**

State: Florida  
Workpaper: 32  
Page: 1 of 1  
Date: 08/08/96

LN	Description	Hours	Labor Rate	InRetain Factor	GRT Factor	Disconnect Factor	Nonrecurring Cost
1	Local Carrier Service Center (LCSC)						
2	Installation						
3	Disconnect						
4							
5	Circuit Provisioning Center (CPC)						
6	Installation						
7	Disconnect						
8							
9	Network Services Clerical (SOP89)						
10	Installation						
11	Disconnect						
12							
13	Switching Control Center (SCC)						
14	Installation						
15	Disconnect						
16							
17							
18							
19							
20							
21	RTU Fees						
22							
23							
24							
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30	Total Nonrecurring						
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INTERCOM BUSINESS FORMS, INC. (407) 986-2828 FAX (407) 986-2828

DEVELOPMENT OF NONRECURRING COST  
3 WIRE BORN UNBUNDLED LOOP

LEVEL 1000 - 1000

46-3

STATE: FLORIDA  
WORKPAPER: 466  
PAGE: 1 OF 1  
DATE: Jul-98

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DESCRIPTION

DIRECTLY ASSIGNED

(A)  
INSTALL  
WORKTIMES (HRS)  
FIRST ADDL

(B)  
DISCONNECT  
WORKTIMES (HRS)  
FIRST ADDL

(C)  
LEVELIZED  
LABOR  
RATE

(D)  
INSTALL  
COST (A\*C)  
FIRST ADDL

(E)  
DISCONNECT  
COST (B\*C)  
FIRST ADDL

(F)  
DISCOUNTED  
DISCONNECT  
COST (E\*DOF)  
FIRST ADDL

(G)  
(D+F)\*(1+GRT)  
TOTAL TOTAL  
FIRST ADDL

F23B01X 00005

46-3

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DEVELOPMENT OF NONRECURRING COST  
2 WIRE ANALOG VOICE GRADE LOOP

STATE: FLORIDA  
WORKPAPER: 750  
PAGE: 1 OF 1  
DATE: Aug-96

LEVEL 1996 - 1998

DIRECTLY ASSIGNED

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	DESCRIPTION	(A)		(B)		(C)	(D)		(E)		(F)		(G)		
		INSTALL		DISCONNECT			LEVELIZED	INSTALL		DISCONNECT		DISCOUNTED		(D+F)*(1+GRT)	
		WORKTIMES (HRS)	ADDTL	WORKTIMES (HRS)	ADDTL		LABOR RATE	COST (A*C)	ADDTL	COST (B*C)	ADDTL	COST (E*DDF)	ADDTL	TOTAL FIRST	TOTAL ADDTL
	CUSTOMER POINT OF CONTACT-ICSC														
	FACILITIES ASSIGNMENT-FACS														
	CIRCUIT PROVISIONING CENTER-CPC														
	NETWORK ADMINISTRATION														
	CO INSTALL & MICE-OKT & FAC-NTEL														
	INSTALL & MICE-SPEC SVCS-SSIM (CONN & TEST)														
	INSTALL & MICE-SPEC SVCS-SSIM (TRAVEL)														
	TOTAL NONRECURRING COST														

46-3

F23801X 000054

*Handwritten signature and initials*



1/29/98  
 BellSouth Telecommunications, Inc.  
 FPSC Docket No. 971140-TP  
 Exhibit AJV-2

**Florida Rate and Cost Analysis  
 Unbundled Network Elements Ordered at the Same Time**

Code R&F #	Rate Element	Standalone Non-recurring UNE Costs and Rates		Percent Discount for UNEs Ordered at Same Time		Non-recurring Costs and Rates for UNEs Ordered at Same Time	
		First	Additional	First	Additional	First	Additional
	<b>UNEs (Non-recurring Only)</b>						
	<i>2-Wire Analog Loop and Port</i>						
A.1.1	2-wire analog voice grade loop 44-111						
B.1.1	Exchange ports - 2-wire analog line port (Res./Bus.) 44-115						
	<b>TOTAL</b>						
	<i>2-Wire ISDN Loop and Port</i>						
A.5.1	2-wire ISDN digital grade loop 44-112						
B.1.5	Exchange ports - 2-wire ISDN port 44-116						
	<b>TOTAL</b>						
	<i>4-Wire Analog Loop and Port</i>						
A.4.1	4-wire analog voice grade loop 44-113						
B.1.2	Exchange ports - 4-wire analog voice grade port (not set)						
	<b>TOTAL</b>						
	<i>4-Wire DS1 Digital Loop and Port</i>						
A.9.1	4-wire DS1 digital loop 44-114						
B.1.6	Exchange ports - 4-wire ISDN DS1 port 44-117						
	<b>TOTAL</b>						

\* Permanent rates set and approved by the FPSC in Order No. PSC-96-1579-FOF-TP, page 116 (Attachment A, page 3 of 4).

*Kew  
 2/16/98  
 JHP*

44