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May 29, 2001

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 001797-TP

Dear Ms. Bayo:

On May 23, 2001, Covad Communications Company filed the Joint Rebuttal Testimony and Exhibits of Elizabeth R. Y. Kientzle and Joseph P. Riolo. It has come to our attention that the heading was not legible on the Exhibit No. ERYK/JPR-5. Therefore enclosed are the original and 15 copies which we ask that you substitute in the filing.

We apologize for any inconvenience which this might have caused and thank you in advance for your assistance.

Sincerely,



Vicki Gordon Kaufman

APB _____
CAF _____
CMP _____
COM 5 + 0 Enclosures
CTR _____
ECR _____
LEG I Catherine F. Boone
CPC _____
PAI _____
RGO _____
SEC I
SER _____
OTH Cover letter

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER 001797-TP
07095 JUN-60
FPSC-REC-117/RECORDING

BellSouth Rate Element	UNBUNDLED NETWORK ELEMENTS	RECURRING/ NONRECURRING	BELLSOUTH PROPOSED PRICE	COVAD CORRECTIONS TO BSB- PROPOSED PRICE	COVAD PROPOSED PRICE
	LINE SHARING HOME-RUN COPPER				
NA	High Bandwidth Portion of Loop	RECURRING	\$0.00	NA	\$0.00
J 4 1	BellSouth-Owned Splitter, 96-line capacity	RECURRING NRC	\$201.46 \$377.72	\$89.11 \$0.00	\$85.44 See Notes 1, 2
J 4 2	BellSouth-Owned Splitter, 24-line capacity	RECURRING NRC	\$50.37 \$377.72	\$22.28 \$0.00	\$21.38 See Notes 1, 2
NA	BellSouth-Owned Splitter, 8-line block	RECURRING NRC	NA NA	NA NA	\$7.12 See Notes 1, 2
NA	Covad-Owned Splitter in BellSouth space, 96-Line Shelf	RECURRING NRC	NA NA	NA NA	\$9.60 \$22.23 (Note 2)
NA	Covad-Owned Splitter in BellSouth space, 24-Line Shelf	RECURRING NRC	NA NA	NA NA	\$2.40 \$6.24 (Note 2)
NA	Covad-Owned Splitter in BellSouth space, 8-Line Block	RECURRING NRC	NA NA	NA NA	\$0.80 \$2.08 (Note 2)
J 4 6	Covad-Owned Splitter in Covad collocation space -- "per LSOD"	NRC	\$115.29	\$0.00	NA
J 4 7	Covad-Owned Splitter in Covad collocation space -- "per occurrence of 24 lines"	NRC	\$57.72	\$0.00	NA
J 4 3	Per-Line Activation	RECURRING NRC	No permanent rate (Note 3) \$32.07	No permanent rate (Note 3) \$12.00	No permanent rate (Note 3) \$11.17
J 4 4	"Per subsequent activity per rearrangement"	NRC	\$32.78	\$0.00 (Note 4)	NA
	FIBER-FED	RECURRING/NRC	NA	NA	See Note 5

Note 1 Installation costs for BellSouth-owned splitters are included in Covad's proposed recurring costs

Note 2 Tie cable prices should be set per the Covad interconnection agreement. Only one tie cable is required for an efficient line-sharing arrangement.

Note 3 BellSouth and Covad have agreed on an interim recurring price of \$0.61 for this element. Pursuant to the agreement, BellSouth will not seek to establish permanent prices for this rate element until the Line Sharing OSS upgrades are fully commercially available.

Note 4 The Commission should reject this unexplained and unsupported element. If the Commission makes any use of BellSouth's study, it should reduce BellSouth's proposed price by at least 50%.

Note 5 The Commission should establish a docket to consider costs and prices for the elements necessary to provide DSL over fiber.