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ORIGINAL

September 3, 1999

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RECORDS AND REPORTING

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990750-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Withdrawal of Testimony and Filing of Revised Testimony for Alphonso J. Varner, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Bennett L. Ross
Bennett L. Ross (BR)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

- AFA _____
- APP _____
- CAF _____
- CMU* Favors _____
- CTR _____
- EAG _____
- LEG _____
- MAS 3/08 _____
- OPC _____
- PAI _____
- SEC I _____
- WAW _____
- OTH _____

man
DIVISION OF RECORDS AND REPORTING

DOCUMENT NUMBER-DATE

10659 SEP-3 99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 990750-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 3rd day of September, 1999 to the following:

Diana Caldwell
Staff Counsel
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Commission
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Bennett L. Ross

*Signed a Protective Agreement

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re:)
)
Petition for Arbitration of ITC^DeltaCom)
Communications, Inc. with BellSouth)
Telecommunications, Inc. pursuant to the)
Telecommunications Act of 1996.)
_____)

Docket No. 990750-TP

Filed: September 3, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF
WITHDRAWAL OF TESTIMONY AND FILING OF REVISED TESTIMONY**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully gives notice that it is withdrawing two pages of the testimony of Alphonso Varner, as well as Exhibit AJV-1 to Mr. Varner's testimony, and is hereby filing revised pages (12, 12A, and 68) and revised Exhibit AJV-1 in their place. These revisions are necessary in order to more accurately reflect the issues that are the subject of this arbitration and to correctly reflect elements for which this Commission has already established cost-based rates.

In its petition for arbitration, ITC^DeltaCom raised the following issue: "What should be the appropriate rate for cageless/shared collocation in light of the recent FCC Advanced Services Order?" Arbitration Petition, Issue 6(d). This issue was one of many addressed by Mr. Varner in his testimony. After the testimony was filed with the Commission, however, BellSouth discovered that Exhibit AJV-1 inadvertently contained proposed interim rates for collocation elements that were unrelated to cageless or shared collocation. These rate

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elements should not have been included in Exhibit AJV-1 or referenced in Mr. Varner's testimony. The revised pages and revised Exhibit AJV-1 that BellSouth is filing herewith correct this error.

As originally filed, Exhibit AJV-1 also omitted the reciprocal compensation rates established by this Commission in Docket Nos. 960757-TP, 960833-TP, and 960846-TP. The revised Exhibit AJV-1 corrects this error as well.

BellSouth regrets any inconvenience that it has caused the Commission or ITC^DeltaCom.

Respectfully submitted this 3rd day of September 1999.

Nancy B. White

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R. Douglas Lackey

R. DOUGLAS LACKEY (for)
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1 reasonable course is to continue to apply rates that this Commission has
2 already found to be just, reasonable, and cost-based as required by the Act.

3

4 Q. PLEASE EXPLAIN THE INFORMATION CONTAINED IN YOUR
5 EXHIBIT AJV-1.

6

7 A. Only the rates for those capabilities which ITC^DeltaCom expressly raised as
8 an issue in its Petition for Arbitration are included in Exhibit AJV-1 attached to
9 my testimony. The source of the rate is generally denoted by the date of the
10 Commission's Orders in the arbitration proceedings ("4/29/98 Order" or
11 "12/31/96 Order"). There are certain elements requested by ITC^DeltaCom in
12 its Petition, for which this Commission has not previously approved rates. The
13 term "Cost Study" is used to denote the rates that are being proposed for such
14 elements, based on the new cost studies that have been filed in this proceeding.

15

16 Finally, in order for BellSouth to meet the requirements of the FCC's recent
17 Advanced Services Order as it relates to the provision of collocation,
18 BellSouth will file with this Commission a complete cost study for Security
19 Access Systems that will be conducted using the cost methodology and inputs
20 specified by this Commission in its April 29, 1998 Order. In the meantime,
21 BellSouth proposes that the appropriate rate for Security Access Systems is the
22 rate for "Physical Collocation – Security Access System - New Access Card
23 Activation, per request – 5 cards", as approved by this Commission in its April
24 29, 1998 Order. This approved rate is included in Exhibit AJV-1, attached to
25 my testimony.

1

2 *Issue 1(a): Should BellSouth be required to comply with the performance measures*
3 *and guarantees for pre-ordering/ordering, resale, and unbundled network elements*
4 *("UNEs"), provisioning, maintenance, interim number portability and local number*
5 *portability, collocation, coordinated conversion and the bona fide request processes*
6 *as set forth fully in Attachment 10 of Exhibit A of this Petition?*

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1 A. Yes. The rates BellSouth proposes for collocation are contained in Exhibit
2 AJV-1 attached to my testimony. Rates for many of the collocation elements
3 were approved by the Commission in its April 29, 1998 Orders (Cost Ref. #
4 H.1.1 - H.1.19). To order cageless and shared collocation, ITC^DeltaCom
5 would simply order the amount of floor space necessary for their collocation
6 arrangement. Whether they then elect to enclose or share the arrangement is
7 up to them. The floor space rate has already been approved by this
8 Commission and is still appropriate for caged, cageless or shared collocation.

9
10 In order for BellSouth to meet the requirements of the FCC's recent Advanced
11 Services Order as it relates to the provision of collocation, it is necessary for
12 BellSouth to offer rates for Security Access Systems. BellSouth will file with
13 this Commission a complete cost study for Security Access Systems that will
14 be conducted using the cost methodology and inputs specified by this
15 Commission in its April 29, 1998 Order. In the meantime, BellSouth proposes
16 a single interim rate approved by the Florida Public Service Commission in its
17 April 29, 1998 Order for "Physical Collocation - Security Access System -
18 New Access Card Activation, per request - 5 cards". This approved rate is
19 included on Exhibit AJV-1.

20
21 *Issue 43: [ITC^DeltaCom No. 6(e)] Should BellSouth be permitted to charge for*
22 *ITC^DeltaCom for conversions of customers from resale to unbundled network*
23 *elements? If so, what is the appropriate charge?*

24
25 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

Florida Rate and Cost Analysis

Cost Ref. #	Rate Element	Cost			Rate			Source
		Recurring	Non-recurring Electronic	Non-recurring Manual	Recurring	Non-recurring Electronic	Non-recurring Manual	
A.0	Unbundled Local Loop							
A.1	2-Wire Analog Voice Grade Loop							
A.1.1	2-wire analog voice grade loop – service level 1	17.12	34.04 31.12		17.12	34.04 31.12		Cost Study
A.1.2	2-wire analog voice grade loop – service level 2	20.52	84.40 81.56		20.52	84.40 81.56		Cost Study
A.1.5	2-wire analog voice grade loop – service level 2 – order coordination for specified conversion time		36.85			36.85		Cost Study
A.1.199	2-wire analog voice grade loop – service level 1 – disconnect		1.70 1.70			1.70 1.70		Cost Study
A.1.299	2-wire analog voice grade loop – service level 2 – disconnect		20.99 20.99			20.99 20.99		Cost Study
A.6	2-Wire Asymmetrical Digital Subscriber Line (ADSL) Loop							
A.6.1	2-wire asymmetrical digital subscriber line (ADSL) loop				15.81	113.85 99.61		4/29/98 Order
A.7	2-Wire High Bit Rate Digital Subscriber Line (HDSL) Loop							
A.7.1	2-wire high bit rate digital subscriber line (HDSL) loop				12.12	113.85 99.61		4/29/98 Order
A.8	4-Wire High Bit Rate Digital Subscriber Line (HDSL) Loop							
A.8.1	4-wire high bit rate digital subscriber line (HDSL) loop				18.24	116.91 101.71		4/29/98 Order
	Reciprocal Compensation							
C.1.1	End office switching function per MOU				.0175 Init. .005 add'l.			12/31/96 Order

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Shaded entries indicate rates approved by the Florida Public Service Commission in its April 29, 1998 Order No. PSC-98-0604-FOF-TP in Docket Nos. 960757-TP, 960833-TP, and 960846-TP or in its December 31, 1996 Order No. PSC-96-1579-FOF-TP in Docket Nos. 960833-TP, 960846-TP, and 960916-TP.

Under the non-recurring column, where there are two entries, the first entry is for the first unit installed, and the second entry is for each additional unit installed.

Florida Rate and Cost Analysis

Cost Ref. #	Rate Element	Cost			Rate			Source
		Recurring	Non-recurring Electronic	Non-recurring Manual	Recurring	Non-recurring Electronic	Non-recurring Manual	
	Tandem switching function per MOU				.00029			12/31/96 Order
	Common Transport – per mile, per MOU				.000012			12/31/96 Order
	Common Transport – facilities termination per MOU				.0005			12/31/96 Order
F.0	Operations Support Systems (OSS)							
F.1	Operations Support Systems (OSS)							
F.1.1	Recovery of incremental OSS costs, per ASR order		6.78	20.08		6.78	20.08	Cost Study
H.0	Collocation							
H.1	Physical Collocation							
H.1.1	Physical Collocation – application cost				15.53		3,248.00	4/29/98 Order
	Physical Collocation – cage construction cost per first 100 square feet							4/29/98 Order
	Wire cage				41.99			
	Gypsum cage				84.10			
	Fire rated cage				99.73			
	Physical Collocation – cage construction cost per first additional 50 square feet							4/29/98 Order
	Wire cage				4.14			
	Gypsum cage				9.35			
	Fire rated cage				11.30			
H.1.5	Physical Collocation – cable installation cost per cable				2.77		1,056.00	4/29/98 Order
	Physical Collocation – cable installation cable rack				22.94			4/29/98 Order
H.1.6	Physical Collocation – floor space, per square foot – Zone A				4.25			4/29/98 Order
H.1.8	Physical Collocation – power, per ampere (48V DC)				6.95			4/29/98 Order
H.1.12	Physical collocation – DS3 cross connects							
	Cross connects 2-wire, per 100 circuits				5.24	1157.00		4/29/98 Order

-2-

Shaded entries indicate rates approved by the Florida Public Service Commission in its April 29, 1998 Order No. PSC-98-0604-FOF-TP in Docket Nos. 960757-TP, 960833-TP, and 960846-TP or in its December 31, 1996 Order No. PSC-96-1579-FOF-TP in Docket Nos. 960833-TP, 960846-TP, and 960916-TP.

Under the non-recurring column, where there are two entries, the first entry is for the first unit installed, and the second entry is for each additional unit installed.

Florida Rate and Cost Analysis

Cost Ref. #	Rate Element	Cost			Rate			Source
		Recurring	Non-recurring Electronic	Non-recurring Manual	Recurring	Non-recurring Electronic	Non-recurring Manual	
	Cross connects 4-wire, per 100 circuits				5.24	1157.00		4/29/98 Order
	Cross connects DS-1/DCS, per 28 circuits				226.39	1950.00		4/29/98 Order
	Cross connects DS-1/DSX, per 28 circuits				11.51	1950.00		4/29/98 Order
	Cross connects DS-3/DCS, per circuit				56.97	528.00		4/29/98 Order
	Cross connects DS-3/DSX, per circuit				10.06	528.00		4/29/98 Order
	Cross connects - Optical circuits, per connection				6.46	2431.00		4/29/98 Order
	Physical Collocation - Security Access System - New Access Card Activation, per request-5 cards						85.12	4/29/98 Order
	Physical collocation - security escort - basic, per quarter hour						10.89	4/29/98 Order
H.1.18	Physical collocation - security escort - overtime, per quarter hour						13.64	4/29/98 Order
H.1.19	Physical collocation - security escort - premium, per quarter hour						16.40	4/29/98 Order

Shaded entries indicate rates approved by the Florida Public Service Commission in its April 29, 1998 Order No. PSC-98-0604-FOF-TP in Docket Nos. 960757-TP, 960833-TP, and 960846-TP or in its December 31, 1996 Order No. PSC-96-1579-FOF-TP in Docket Nos. 960833-TP, 960846-TP, and 960916-TP.

Under the non-recurring column, where there are two entries, the first entry is for the first unit installed, and the second entry is for each additional unit installed.