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March 18, 2002

VIA HAND DELIVERY

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

Re:

Docket No.: 990649B-TL

Dear Ms. Bayo:

On behalf of the Z-Tel Communications, Inc., enclosed for filing and distribution are the original and 15 copies of Supplemental Testimony of Dr. George S. Ford.

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

JAM/mls Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track)

Docket No. 990649B-TP

SUPPLEMENTAL TESTIMONY OF

DR. GEORGE S. FORD

ON BEHALF OF Z-TEL COMMUNICATIONS, INC.

MARCH 18, 2002

Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS

- 2 A: My name is George S. Ford. My business address is 601 South Harbour Island
- Boulevard, Suite 220, Tampa, Florida 33602.

1

4 Q: HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

5 A: Yes. I filed Revised Rebuttal Testimony on January 30, 2002.

6 Q: WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?

- 7 A: In my Revised Rebuttal testimony, I described the use of the output of the FCC's HCPM 8 cost model to develop relationships between the costs that BellSouth and Verizon incur to 9 provide UNEs and the rates that correspond to those costs. During my deposition I was 10 apprised that the FCC recently made adjustments to its computation of loop and 11 switching costs within the context of this comparative analysis. I have updated my 12 calculations to mirror those the FCC employed in the 271 Orders beginning with the 13 Pennsylvania 271 Order. These computations are made using the most recent version of 14 HCPM output files. The purpose of this supplemental testimony is to sponsor Exhibit 15 (GSF-12), which shows the results of the update. The exhibit is attached.
- 16 Q: DOES THE RESULT OF APPLYING THE MOST RECENT CALCULATIONS
- 17 AND VINTAGE OF HCPM LEAD YOU TO ALTER YOUR CONCLUSIONS IN
- 18 ANYWAY?
- 19 A: No. As the exhibit shows, the use of the updated calculations does not result in any
 20 material changes to my earlier exhibit. In fact, the discrepancies that I described in my
- 21 earlier testimony are slightly more pronounced in the updated exhibit.

22 Q: DOES THAT COMPLETE YOUR TESTIMONY?

23 A: Yes.

Docket No. 990649-B-TP
Ford Exhibit No. _____ (GSF-SR12)
Page 1 of 1

HCPM Cost Estimates for BellSouth and Verizon

MCI WI Cost Estimates for Delisouth and Vermon		
	Verizon	BellSouth
	Florida	Florida
Loop	13.40	13.89
Switching	3.24	3.52
Minutes		
End-Office Switching	1,362	1868
Direct Transport	914	1302
Common Transport	150	158
Tandem Switching	84	94

Verizon Loop is 3.5% less than Bellsouth loop.

Verizon Switching is 8.1% less than BellSouth switching.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Dr. George S. Ford's Supplemental Testimony was on this 18th day of March 2002 been served (*) Hand Delivery and U.S. Mail to the following:

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