BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF D. DAONNE CALDWELL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 040301-TP

OCTOBER 8, 2004

Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

A. My name is D. Daonne Caldwell. My business address is 675 W. Peachtree St., N.E., Atlanta, Georgia. I am a Director in the Finance Department of BellSouth Telecommunications, Inc. (hereinafter referred to as "BellSouth"). My area of responsibility relates to the development of economic costs.

Q. ARE YOU THE SAME D. DAONNE CALDWELL THAT FILED TESTIMONY PREVIOUSLY IN THIS DOCKET?

A. Yes. I filed direct testimony on September 8, 2004.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. My testimony responds to the testimony of Supra Telecommunications and Information Systems, Inc. ("Supra") witness David Nilson with respect to cost development issues.

Q. MR. NILSON STATES THAT: "SUPRA'S FIRST AMENDED PETITION

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REQUESTS THE ESTABLISHMENT OF TWO RATES, WHICH ARE ACTUALLY TAILORED TO THE SPECIFIC JOB FUNCTIONS INVOLVED IN PERFORMING CONVERSIONS." (PAGE 6, LINES 9-11) SHOULD THE FLORIDA PUBLIC SERVICE COMMISSION ("COMMISSION") ESTABLISH RATES IN THIS PROCEEDING?

A. No. If the Commission wishes to entertain Supra's proposal for a bifurcated rate structure, a full and open cost proceeding would be the appropriate avenue to reach such a goal. This would allow BellSouth the opportunity to present the applicable cost studies, allow interested parties to present evidence, allow the Commission an opportunity to review and evaluate information specifically formulated to support a revised rate structure, and allow cost-based rates to be established consistent with that structure. I am not advocating that a new rate structure is necessary, only that a complaint case is not the correct vehicle to implement such a major change. Furthermore, the Commission has already established rates for the elements that are required to implement the hot-cut process --- the unbundled loop, collocation cross connect, and service order rates.

Additionally, Mr. Nilson's interpretations of certain clauses outlined in the Supra's Interconnection Agreement ("Agreement") are inexact. It appears he is attempting to perpetuate the notion that BellSouth should absorb the "costs and expenses" associated with the hot-cut process. I have not been directly involved with the negotiation of the Agreement and am not a legal expert; however, a simple reading of the sections cited by Mr. Nilson highlights the error in his logic. Section 3 is entitled "Termination of Agreement: Transitional Support" and describes Supra's

rights to terminate any service or element provided under the Agreement. While Supra may be "terminating" its use of UNE-P, it is also purchasing an unbundled loop and a collocation cross connect and thus, the commission-ordered rates associated with those elements apply (in addition to the rate for processing the service order). Section 7 of the Agreement deals with the various costs of doing business that might arise due to governmental actions, lawsuits, etc. and does not govern applicable rates and charges for services and network elements provided or later to be sought under the Agreement. Finally, Section 22.1 states: "Except as otherwise stated in this Agreement, or any FCC or Commission order or rules, each Party shall be responsible for its costs and expenses in complying with its obligations under this Agreement." Mr. Nilson apparently believes that because the actual methodology for completing a UNE-P to UNE-L "hot cut" does not specifically appear in the Agreement, BellSouth is liable for these "costs and expenses." This is unreasonable. Supra is purchasing an unbundled loop and a collocation cross connect, the "hot cut" is just the means or process to facilitate that request.

Q. MR. NILSON CONTENDS THAT YOU ADMITTED THAT YOU "NEVER PREPARED, SUBMITTED OR DISCUSSED THE CONVERSION OF UNE-P TO UNE-L IN THE LAST GENERIC UNE DOCKET." (PAGE 6, LINES 5-6) PLEASE COMMENT.

A. The topic of UNE-P to UNE-L conversions was not specifically addressed in the generic cost docket since hot cuts are not unbundled network elements; instead hot cuts reflect the process to migrate from facilities connected to BellSouth's switch

(combinations) to unbundled elements served by Supra's switch. The costs associated with the conversion process are captured in the nonrecurring rates approved by the Commission. Indeed, in generic cost proceedings, this Commission established cost-based rates applicable to all CLECs for the conversion of UNE-P combinations to UNE loops (UNE-Ls) and collocation cross connects. Today, these exact rates are being paid by other CLECs for hot cuts. For example, in response to BellSouth's application for long-distance relief in Florida, AT&T argued that "BellSouth's hot cut charges for Service Level-2 (SL-2) loops in Florida are unlawful, anti-competitive, and do not comply with TELRIC principles." The FCC disagreed and found that "BellSouth's SL-2 hot cut charges satisfy checklist item 2." *See* FCC 02-331, WC Docket 02-307, dated December 19, 2002 ("FL/TN Order"), ¶¶33, 44. There is nothing unique about Supra's Agreement that should quarantine them from the charges. Moreover, both AT&T and the FCC recognized that even though a rate labeled "hot-cut" does not appear in rate sheets, the nonrecurring cost associated with the unbundled loop being purchased is a component of the "hot-cut" rate.

Q. WHAT NONRECURRING RATE STRUCTURE WAS APPROVED BY THIS COMMISSION FOR UNBUNDLED LOOPS?

A. As I stated in my direct testimony and reiterated in my August 18, 2004 deposition[1], the nonrecurring cost study reflects a rate structure based upon an average loop. Thus, all of the inputs (i.e., the work times and probabilities)

[1] *See* for example pages 19-21, page 26, and pages 77-78 of the deposition.

considered this fact. Again, if Supra wanted a rate structure different from the one consistently proposed by BellSouth[2] and approved by this Commission, the appropriate forum would be a generic cost proceeding in which all CLECs could voice an opinion, not in a complaint proceeding. Additionally, it is not a forgone conclusion that a new cost proceeding will necessarily result in lower rates as Mr. Nilson contends on page 37. A new rate structure that segments costs between copper/universal digital loop carrier ("UDLC") and integrated digital loop carrier ("IDLC") or working versus non-working --- Supra appears to mix and match exactly which rate structure it wants ---- moves costs that were developed on an average into specific rate elements. It follows that since an average loop will no longer provide the basis for the inputs, some costs will be higher than the average and some will be lower than the average. Furthermore, updated input data and labor rates will be reflected in any future cost study filing.

Q. WHAT DO YOU MEAN WHEN YOU STATE THAT THE COSTS AND RATES WERE BASED UPON AN "AVERAGE LOOP"?

A. An "average loop" rate structure anticipates that a CLEC could order an unbundled loop with any possible facility make-up that would support the loop's transmission requirements. Thus, the loop to be converted could be copper, UDLC, IDLC, working, or non-working. The nonrecurring costs reflect the average work times to provision the loop regardless of the physical make-up. Any other rate structure would create an unequal competitive playing field; one based solely on the

[2] In fact, BellSouth has developed costs based on this assumption from the very first UNE generic cost proceedings in 1997.

geography and technology of the loop. One CLEC would potentially pay a higher nonrecurring rate for an unbundled SL1 loop (higher than the current commission-ordered rate of $49.57) just because the loop was served by integrated digital loop carrier. This is unfair to the CLECs. Moreover, it is unfair to the end-users. Consider the fact that BellSouth has actively been deploying fiber-based feeder served via NGDLC systems for loops longer than 12,000 feet for many years. Thus, those customers that are further from the central office would most often be served via IDLC. Under Supra's plan, those customers would become less desirable to competitors since the nonrecurring cost to unbundled those IDLC-served loops will be significantly higher than the current $49.57 rate. Furthermore, a rate structure based on an "average loop" approach is consistent with the one the Commission endorses for BellSouth's retail offerings. To change rate structures now would set a dangerous precedent for both wholesale and retail future rate proceedings. The practical outcome of Supra's rate proposal would be that end-users served by IDLC (34.5% statewide – *See* footnote 3 of my direct testimony) would lose competitive advantages because the CLECs' cost to obtain those customers would be greatly increased.

Q. IS THE APPROVED RATE STRUCTURE CONSISTENT WITH THE FEDERAL COMMUNICATIONS COMMISSION'S ("FCC'S") PRICING PRINCIPLES?

A. Yes. In the Federal Communications Commission's ("FCC's") *Local Competition First Report and Order*, the FCC defined the loop that BellSouth is obligated to unbundle as "a transmission facility between a distribution frame, or its equivalent,

in an incumbent LEC central office, and the network interface device at the customer premises." (¶380) The FCC's *UNE Remand Order* further refined this definition of the loop: "We modify the definition of the loop network element to include all features, functions, and capabilities of the transmission facilities, including dark fiber **and attached electronics** (except those used for the provision of advanced services, such as, DSLAMs) owned by the incumbent LEC, between an incumbent LEC's central office and the loop demarcation point at the customer premises." (¶167, emphasis added) Thus, local loops "are the transmission facilities between a central office and the customer's premises, i.e., the 'last mile' of a carrier's network that enables the end-user customer to receive, for example, a telephone call or facsimile, as well as to originate similar communications." (*TRO*, ¶203) Note that none of the FCC's definitions of the local loop refers to the technologies used by the incumbent to provide the local loop that is provisioned for the CLEC. BellSouth is not selling a technology; instead it is providing "transmission facilities" to the CLEC.

As this Commission is aware, the FCC's Total Element Long Run Incremental Cost ("TELRIC") principles require that costs be based on the least cost, most efficient, forward-looking technologies. It would be inconsistent to assume that the UNE-P (or retail or resale) loop that is to be unbundled is only copper/UDLC for nonrecurring cost development yet is provisioned on copper, UDLC, or IDLC for recurring cost calculations. However, that is exactly the result of Supra's cost proposal. In fact, Supra is gleaning the benefits derived from assuming the UNE-P loop and the SL1/SL2 unbundled loops are served via the least-cost arrangement which reflects the deployment of NGDLC systems through lower than actual

recurring cost-based rates. Supra's desire to now create a distinction between nonrecurring costs based on existing loop technologies simply is not reasonable.

Q. HOW DOES THE AVERAGE LOOP COST APPROACH REFLECT THE LOOP'S PHYSICAL MAKE-UP?

A. The loop to be unbundled could be all-copper, it could be served by a UDLC system, or it could be served by an IDLC system. The inputs into the nonrecurring cost study reflect the probabilities that the CLEC-ordered loop could be any one of these configurations[3]. As I mentioned in my direct testimony, the probability of dispatch is one area where this "average loop" assumption is manifested. It is also evident in the percent digital loop carrier input contained in the cost study. (*See* file FL-2W.xls[4], filed in Docket No. 990649-TP, worksheet INPUTS_MISC., line 7 - % DLC; Column C - 55.00%) This input is applied to activities unique to loops served by digital loop carrier ("DLC") systems (UDLC or IDLC). For example, Network Plug-In Administration ("PICS"), which controls plug-in inventories, would only be involved if the loop is served by DLC --- i.e., when a plug-in would be required. (Worksheet INPUTS_ENGINEERING of the file shows the PICS'

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[3] Certain xDSL loops must be all-copper. In this proceeding, which centers on UNE-P to UNE-L conversion, the relevant unbundled loops are 2-wire analog loops – Service Level 1 ("SL1") or 2-wire analog loops – Service Level 2 ("SL2"). Converting to either of these loops can be from an all-copper loop, one served by UDLC, or one served by IDLC.

[4] Mr. Nilson is thoroughly confused about the use of this file (FL-2W.xls). Contrary to his claims, this file only reflects nonrecurring costs associated with SL1 and SL2 loops, not for ADSL, HDSL, or ISDN BRI loop provisioning as Mr. Nilson claims on page 25. He further claims that "a nonrecurring rate of 10.2 cents to re-use the retail/resale A.1.1 loop for UNE-P" was established by this Commission. (Page 25, footnote 40) He is wrong. An A.1.1 loop is an unbundled loop that goes to a CLEC's collocation site, not a loop that would be used to provide retail or resale service. The $.00102 rate is for a UNE-P switch-as-is conversion. In other words, a working loop combined with a BellSouth switch port is migrated to the CLEC with no physical change, i.e., it remains in combination. These distortions of facts bring into question Mr. Nilson's other claims.

input multiplied by the 55%.)

Q. HOW DOES THE AVERAGE LOOP APPROACH REFLECT WORKING VERSUS NON-WORKING LOOPS?

A. An "average loop" approach also reflects the fact that the loop may be working or non-working. The cost study anticipates that working loops may be converting from retail (i.e., from a BellSouth end-user), from resale, or from a UNE-P. Indeed, each of these aforementioned cases reflects a loop terminated in BellSouth's switch (in a combined state) that will be removed from the switch and handed-off to the CLEC who will in turn terminate the loop into its own switch. For the same end-user whether the loop is a retail loop, a resale loop, or a UNE-P loop, the physical characteristics of that loop are the same. Thus, if that end-user's loop is unbundled (i.e. is converted to a UNE-L loop), the activities required to accomplish that task are the same[5]. Furthermore, while Mr. Nilson is correct in stating that I did not conduct a specific study for retail to UNE-L conversions, this was one of the possibilities considered in the cost results presented to this Commission in Docket No. 990649-TP.

The working loops involved in the hot cut process have to initially be BellSouth retail, resale, or UNE-P --- i.e., they have to reflect a loop connected to BellSouth's switch. Just because these specific terms (i.e., retail, resale, or UNE-P) have not

[5] If the loop is being converted to a designed loop e.g. the SL2 loop, coordination activities are included in the charge for the hot cut. Coordination is optional for non-designed loops (e.g. the SL1 loop).

been used in the generic cost proceedings to describe the loop to be unbundled does not indicate that they were not considered; the loop has to be one of them. Moreover, Supra's attempt to create some distinction among the three situations with respect to the activities required for the hot-cut process is invalid and unsupportable. Indeed, as BellSouth witness Mr. Ainsworth asserts: "the Retail and UNE-P conversion to UNE-L activities are identical which support identical process cost." (Ainsworth Direct Testimony, page 24, lines 10-11)

The "average loop" approach to developing nonrecurring costs also considers the possibility that the loop may not currently be working and a dispatch will be required[6]. The 1996 Telecommunications Act ("Act") required that BellSouth unbundle its network and provide CLECs access to its loops. Obviously, the loops to be unbundled could be either working or non-working, therefore, the cost studies conducted under an average loop approach appropriately considered both situations. Thus, Mr. Nilson is mistaken when he alleges that "if a customer being served by UNE-P had no service or warm dialtone at the time Supra ordered UNE-P" then BellSouth is over-recovering its costs by imposing the $49.57 rate as part of the hot cut charge. (Nilson Direct Testimony, page 16, lines 3-4) Again, since the costs (and thus the rates) were based on an average loop the possibility that the loop could be working or non-working has been considered. Furthermore, if the UNE-P was originally in a "warm dialtone" state, Supra would have initially been charged a switch-as-is nonrecurring rate of $.102; not the $49.57 claimed by Mr. Nilson to establish the UNE-P combination.

[6] Of course the non-working loop would have to be to a location where BellSouth would normally be providing service.

Q. YOU STATE THAT A DISPATCH WILL BE REQUIRED IF THE LOOP IS NOT CURRENTLY WORKING. IS THIS THE ONLY SITUATION THAT REQUIRES A DISPATCH?

A. No. For example, BellSouth witness Mr. Ken Ainsworth discusses eight alternatives to unbundle (or un-integrate) loops served by IDLC. It is obvious that some of these methods will require a field dispatch, e.g., Alternatives 3 and 4 --- "remove the loop distribution pair from the IDLC and re-terminate the pair....." (Ainsworth Direct Testimony, page 20) Let me note that some of the alternatives described by Mr. Ainsworth would have been considered in the cost study because they reflect typical, normal activities such as transferring a loop served by IDLC to a copper loop. However, not all of the costs associated with the non-typical alternatives are captured in the existing studies; i.e., the provisioning and equipment costs associated with non-typical conversion methods have not been included in the SL1/SL2 cost development. Contrary to Mr. Nilson's claim on page 40 of his testimony, the methods not recognized by the cost study do not necessarily lower the recurring or nonrecurring provisioning costs. BellSouth attempts to restrict the use of these non-typical solutions since they consume switch resources and may require substantial incremental recurring and nonrecurring costs not currently considered in the cost studies and, if considered, could very well increase the cost of a hot cut.

Indeed, the FCC has reviewed each of these methods for unbundling loops served by IDLC, noting both the limitations and additional costs of each. Specifically, the

FCC found that "Multiple Switch Hosting is available only on the newest IDLC systems (Telecordia GR-303) and accommodates only a few competitors; Integrated Network Architecture appears to be cost-effective only for competitive LECs with substantial market penetration, and also works only for GR-303-compatible systems; Digital Cross Connect Systems require all loop signals, including signals for loops retained by the incumbent LEC, to pass through the DCS system for processing, and is therefore **very expensive**." *FCC UNE Remand Order*, ¶ 217, fn. 417, emphasis added. Additionally, the FCC noted that MCI conceded that "Side Door Grooming can only be done for a few lines per remote terminal." *Id.* The FCC finally concluded that "such methods have not proven practicable." *Id.*, ¶ 217, fn. 418. In replying to claims similar to those made by Mr. Nilson (i.e., that lower costs can be obtained by un-integrating IDLC), paragraph 50 of the FCC's *GA/LA Order* is dispositive of the issue: "not only have commenters failed to offer persuasive evidence, but prior Commission orders have recognized that at least certain IDLC alternatives **would likely be more expensive**." (Emphasis added.)

Dispatch is also required for trouble resolution, which may occur even if a working circuit is being unbundled. The cost study input has specific probabilities for trouble resolution at the premises and at the cross box. (*See* file FL-2W.xls, worksheet CONNECT&TEST, lines 33 and 35, column J)

In the nonrecurring cost study presented in Docket No. 990649-TP, which supports

the rates, the Commission accepted a 38% dispatch rate for the SL1 loop[7]. This input was derived from reports of dispatch associated with BellSouth's own retail provisioning activities. This is an appropriate surrogate for the dispatch rate associated with an SL1 loop since it reflects a mix of working and non-working loops and a mix of copper, UDLC and IDLC loops.

Q. MR. NILSON ATTEMPTS TO RECONCILE MR. AINSWORTH'S HOT-CUT FLOWCHART WITH THE NONRECURRING COST STUDY. ARE HIS CONCLUSIONS VALID?

A. No. As an initial matter, I wish to reiterate that this Commission has thoroughly reviewed BellSouth's proposed nonrecurring cost studies and, after making modifications to the work times, has established cost-based rates. Mr. Nilson's superficial comparison of the cost study inputs to Mr. Ainsworth's flowchart in an attempt to cast doubt on the Commission's ordered rates is without merit and provides no useful information.

Mr. Nilson claims that the cost study includes "numerous worksteps of the thirty four (34) individual work activities, performed by nine (9) different paygrades, in seven (7) separate departments which are NOT included in Mr. Ainsworth's five (5) individual work activities, performed by three (3) departments." (Nilson Direct Testimony, page 27, lines 13-15) His implication, based on this previous claim, is that "BellSouth is seeking the maximum possible rate." His conclusion is false

[7] An SL2 loop is a designed loop that includes order coordination and provisioning of test points. In this case dispatch is assumed to be required 100% of the time.

and factually untrue. (Nilson Direct Testimony, page 27, lines 16-17) In formulating this assertion, it appears that Mr. Nilson merely totaled the number of lines in the cost study input sheets to determine the number of activities. Obviously, he failed to read the descriptions of the activities – many correspond to items in Mr. Ainsworth's flowchart --- or to trace the input through the study. Clearly, some of the inputs are only used in the SL2 (designed) loop. Furthermore, this Commission eliminated or substantially reduced the inputs BellSouth proposed. These adjusted input values support the nonrecurring rates and thus are the only ones that are relevant.

Since Mr. Ainsworth's flowchart was designed to reflect the normal process associated with a hot-cut order, fallout activities occurring downstream in the provisioning process were not captured. This explains why the Network Plug-in Administration ("PICS"), Address and Facility Inventory ("AFIG"), and Service Advocacy ("SAC") work groups were not specifically listed in Mr. Ainsworth's document. The cost study clearly indicates these work groups are involved only with fallout (i.e., non-typical) situations. Additionally, since Mr. Ainsworth developed his decision tree from a process flow standpoint, his exhibit does not always capture the degree of granularity expressed in the cost study. For example, his flowchart states "Perform migration activity" for the outside technician. In contrast, the cost study details what the outside technician actually does. Thus, the cost study lists more (numerically) work activities. Moreover, Mr. Ainsworth's chart of workflows was never intended to support BellSouth's cost study. Instead it pictorially depicted the kinds of work steps involved in the hot-cut process, was not intended to reflect all of the departments or all the end-to-end activities

required, e.g., assigning, engineering and/or designing the loops, and assumed that many other work activities had been successfully completed. Considering all my disclaimers, instead of the great disparity alluded to by Mr. Nilson, there is actually a close correspondence between the cost study and the flowchart.

Furthermore, Mr. Nilson asserts, erroneously, that "Mr. Ainsworth's hot cut clearly identifies the one or the other, not both departments [Central Office Forces and Outside Technician] are to be involved" in the hot-cut process. (Nilson Direct Testimony, page 24, lines 23-24) The first decision point (i.e., the first "diamond") in Mr. Ainsworth's flowchart (KLA-1, page 1 attached to Mr. Ainsworth's direct testimony) that questions whether the cut is inside or out occurs prior to, and eventually leads to, the point referenced by Mr. Nilson. If one traces the order flow after that initial decision point, both central office and outside plant technicians are involved even if the cut is designated as "outside". The central office technicians always have pre-conversion work to perform regardless of whether the actual hot cut involves outside plant technicians. In fact, following the arrows through the flowchart, either answer to the question "Outside tech pred'd (pre-assigned)?" leads to the Central Office activity: "Perform preliminary hot cut activity (initial jumper, verify SS7 and CLEC dial tone)."

Finally, Mr. Nilson notes that the "CWINS center which figures prominently in the flowchart KLA-1 is not even mentioned at all by FL-2W.xls." (Nilson Direct Testimony, page 28, lines 1-2) Mr. Nilson fails to realize that the Unbundled Network Element Center ("UNEC") contained in the cost study was renamed CWINS subsequent to the cost study filing in Docket No. 990649-TP and thus,

"figures prominently" in the cost development. Indeed, it is hard to fathom that Mr. Nilson was unaware of the name change in late 2000 since Supra has been an operating CLEC since 1997 and BellSouth has received orders from them since 1998.

Q. ON PAGES 28-30, MR. NILSON OUTLINES WHAT HE BELIEVES ARE THE WORK TIMES AND PROBABILITIES FILED BY BELLSOUTH. PLEASE COMMENT.

A. I would first like to clarify the sequence of nonrecurring cost filings in Docket No. 990649-TP since there appears to be some confusion on Supra's part. On August 16, 2000, BellSouth filed its proposed nonrecurring costs in the generic cost proceeding. On May 25, 2001, the Commission ordered modifications to the work time estimates, eliminated the inflation component of the labor rate[8], and made the runs that resulted in nonrecurring (and recurring) rates. As part of the May 25, 2001 Order ("May 25th Order"), BellSouth was required to file modified versions of its xDSL nonrecurring cost studies, which exclude the following: 1) the DLR, 2) a test point, and 3) order coordination. BellSouth filed the costs for an unbundled copper loop non-designed ("UCL-ND") to fulfill that requirement. In doing so, it was determined that the work time estimate for the Work Management Center ("WMC") had been reduced from the 15 minutes originally filed on August 16, 2000 to 2 minutes for loop provisioning[9]. Thus, nonrecurring costs for all types of

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[8] The Commission later rescinded its ruling with respect to inflation and established nonrecurring rates on October 18, 2001

[9] The Commission did not utilize this information. Thus, the loop nonrecurring rates reflect 15 minutes * (1-65%) or 5.25 minutes of WMC work time.

loops were re-filed with inputs that included the reduction to WMC time and that reflected BellSouth's best attempt at complying with the Commission's input modifications outlined in its May 25th Order. This was filed on October 8, 2001. It is important to note that the nonrecurring rates are based upon calculations made by the Commission that reflect the intent of the orders, not on studies filed by BellSouth. Thus, while BellSouth filed its understanding of the adjustments to the nonrecurring inputs contained in the May 25th Order on October 8, 2001, it is the Commission that ultimately produced the cost-based rates. Thus, Mr. Nilson's implication that BellSouth is somehow trying to raise rates by resurrecting the August 16, 2001 cost study is misguided. (*See* Nilson Direct Testimony, page 29, lines 2-4 and footnote 60)

With regard to Mr. Nilson's testimony on pages 28-30, if Supra had a problem with the final nonrecurring cost study inputs ordered by the Commission it should have voiced them during the generic cost proceeding, not at this time. Indeed, Mr. Nilson has not even reflected those adjustments in his critique of what he apparently believes BellSouth is advocating as cost support for rates in this proceeding. Since these commission-ordered adjustments constitute the inputs upon which the disputed rates have been set, it is important to include them. BellSouth may not agree with the modifications made to its nonrecurring costs by the Commission in establishing rates, but has adopted the charges resulting from the modifications and made them available to CLECs for inclusion in their interconnection agreements (via execution on an amendment).

There are a number of glaring errors in Mr. Nilson's statements that can be seen if

one follows the cost calculations in the study. First, in discussing the circuit provisioning group ("CPG") inputs, Mr. Nilson claims that: "15% of **all** conversions require 19 minutes...." (Nilson Direct Testimony, page 28, line 15, emphasis added) He is wrong. The CPG is not involved at all in the provisioning of an SL1 loop. Clearly, not "all conversions" are impacted by this work group. (The Commission reduced CPG time by 50% in its May 25th Order.)

Second, Mr. Nilson claims that: "10% of **all** conversions require 45 minutes of Engineering (PICS) time ....." and that "90% of **all** conversions require 15 minutes of Engineering (PICS) time ..." (Nilson Direct Testimony, page 28, line 20 and line 25, emphasis added) Again, Mr. Nilson is wrong. The work times associated with the PICS group are multiplied by the percent of lines that are served by DLC (55%) and by the probability of back-order fallout (3%). The result is less than 1.7% (55%*3%) of the 2 wire analog loop orders have PICS involvement. Thus, the study correctly recognizes that this activity "does not even occur on copper," as Mr. Nilson notes. However, PICS is still involved (less than 1.7% of the time) if the loop is served by DLC. (*See* Page 28, lines 22-23) (The Commission reduced PICS work times by 45% in its May 25th Order)

Third, contrary to Mr. Nilson's assertions, BellSouth is not trying to institute an in-depth review of its nonrecurring cost studies in this proceeding. The Commission established rates that BellSouth has incorporated into virtually every interconnection agreement in Florida. As I stated previously, a complaint case is not the appropriate forum for the Commission to establish rates. Since BellSouth never believed that this proceeding should morph into a cost proceeding, BellSouth

never "insisted that the August 16, 2000 cost study is the appropriate one to use," as Mr. Nilson contends. (Nilson Direct Testimony, page 29, lines 3-5) BellSouth provided this cost study (i.e., the August 16, 2001 filing) at Supra's request because, as I explained previously, it is the one the Commission adjusted and used to set nonrecurring rates. BellSouth also provided the October 8, 2001 filing to Supra. However, the only rate set from the October 8, 2001 filing was for the UCL-ND element. No modification was made to the nonrecurring loop rates resulting from the May 25th Order once inflation was re-instated. Moreover, in my direct testimony I stated that due to the underlying assumptions upon which the study was conducted (i.e., the assumed average loop rate structure) the existing cost study could not be used to produce costs associated with a "copper/UDLC only" hot-cut process without further input from the subject matters experts familiar with the provisioning process, as Supra is attempting to do.

The Commission ordered that work times associated with the UNEC be reduced by 45%. Mr. Nilson does not acknowledge this adjustment in his discussion on page 29, lines 8-26. Instead of discussing each of his errors with respect to the UNEC, let me just state that the time reflected in the nonrecurring rate for an SL1 loop is 11.39 minutes and about 50 minutes for the SL2 loop, a designed loop with coordinated provisioning. Thus, Mr. Nilson, who claims that "85% of all conversions require 53.60 additional minutes of Connect and test labor (UNEC) ...." obviously has overstated the times assumed in the cost-based rates. (Nilson Direct Testimony, page 29, lines 21-22)

Mr. Nilson makes similar errors in his discussion on Installation and Maintenance

and Work Management Center work times and probabilities, i.e., ignoring the Commission's adjustments, claiming **all** conversions require the activity, and forgetting to apply all probabilities. Needless to say, Mr. Nilson's assessments should be viewed with skepticism.

Q. MR. NILSON CALCULATES A RATE OF $5.27 FOR A UNE-P TO UNE-L CONVERSION WHERE THE UNE-P LOOP IS SERVED BY COPPER OR UDLC. HE CLAIMS HIS APPROACH REFLECTS "THE VERY SAME PROCESS THAT THE FPSC AND THE INDUSTRY USED IN DOCKET 990649-TP." (PAGE 36, LINES 22-23) IS HE CORRECT?

A. Absolutely not. Mr. Nilson has gone beyond merely making adjustments to input values. Indeed, he has attempted to create a new rate structure (segmenting copper/UDLC loops and IDLC loops) based solely upon his opinion as to what activities are necessary. In determining input adjustments in Docket No. 990649-TP, the Commission accepted the rate structure and then thoroughly reviewed the evidence that was presented relative to that structure. Indeed, as I mentioned previously when the Commission ordered that a new rate structure be developed for an xDSL nonrecurring cost, which excludes the following: 1) the design layout record ("DLR"), 2) a test point, and 3) order coordination, it did not manipulate the existing study. Instead, the Commission ordered BellSouth to provide a new cost study for its review.

Q. PLEASE COMMENT ON MR. NILSON'S CALCULATIONS, WHICH RESULTED IN THE $5.27 RATE.

A. Again, this Commission has established cost-based rates for the elements that comprise the hot-cut process; i.e., the nonrecurring unbundled loop rate, the cross-connect rate, and the service order processing rate; thus, Mr. Nilson's calculations are unnecessary. It appears that Mr. Nilson has attempted to manufacture a "Supra-only" cost study unique to the manner in which Supra supposedly conducts its business. Nevertheless, Mr. Nilson makes a number of incorrect claims in discussing the development of his $5.27 rate. First, he has only considered the loop portion of the hot-cut process, ignoring the legitimate collocation cross-connect costs and service order processing costs. Second, this Commission has already investigated the amount of time required by the central office technician in provisioning an unbundled loop and collocation cross connect.[10] Mr. Ainsworth's 2+ minutes referenced in the TRO proceedings only considered the amount of time to actually cut the circuit and did not encompass all of the activities performed by the central office technician during a hot cut – printing the order, pre-testing, pre-wiring, post-cut testing, and updating the dispatch system, as Mr. Ainsworth explains in his rebuttal testimony. Therefore, Mr. Nilson's concern about this input is unfounded. I have previously addressed the fact that SAC, PICS, and AFIG times are the result of fall-out from downstream systems. SAC and AFIG activities would occur even if the loop is not served by IDLC. PICS activities would occur for loops served by DLC – both UDLC and IDLC – especially if the loop is not currently working. If the loop that is to be converted to an unbundled

[10] BellSouth determined that the May25th Order allowed 10.2 minutes of central office time. The order in the Covad arbitration set the central office time for collocation cross connect at 3 minutes. Thus, the total central office time in the hot-cut process is 13.2 minutes.

loop is working and served by copper or UDLC, however, SAC and PICS would not be involved.

The WMC ensures the dispatch of technicians, both in the central office and in the field. Thus, this work group would be involved even if the loop to be unbundled was not served by DLC. As I explained previously, while BellSouth filed two minutes for this work group in the 120-day proceeding, the current nonrecurring loop rates reflect 5.25 minutes. While Mr. Nilson discusses some non-zero input for WMC, his "cost study" does not reflect any time in his results.

Q. MR. NILSON ALSO CONTENDS THAT THE RATE FOR A UNE-P TO UNE-L HOT CUT FOR LOOPS SERVED BY IDLC SHOULD BE SET AT $.102. IS THIS APPROPRIATE? (NILSON TESTIMONY, PAGE 43)

A. Absolutely not. The $.102 rate set by this Commission reflects the costs incurred by BellSouth to provide a UNE-P loop and switch port on a switch-as-is basis (from retail, resale, or existing UNE-P) to a CLEC. In this case, the working loop remains connected to BellSouth's switch and the circuit is never broken. This rate merely captures costs associated with the Recent Change Memory Group (switch translations) and AFIG time when the order falls out of the system.

Mr. Nilson appears to be parroting a claim made by AT&T in the UNE cost docket, i.e., "that provisioning that happens exclusively via flow through OSS commands has a distinctly identifiable cost on the order of what the Commission had determined was appropriate for a PIC change." (Nilson Direct Testimony,

Page 42, lines 15-17) In his rebuttal testimony filed July 31, 2000 in Docket No. 990649-TP, AT&T witness Mr. Jeffery King claimed: "Fiber technology and the intelligent digital and optical support equipment also provide for remote electronic access and mechanization efficiencies for installing, disconnecting and rearranging UNE and UNE combinations." Rebuttal Testimony of Jeffrey King at 13, Docket No. 990649-TP (July 31, 2000) The May 25th Order confirms that the Commission considered this assertion and rejected it: "In his review and critique of BellSouth's cost studies witness King essentially assumed, e.g., the existence of a fully automated ordering system which could identify all errors on an electronically submitted local service request (LSR) and resubmit it to the ALEC. However, he subsequently admitted that he was unaware if such a system had actually been implemented anywhere." (May 25th Order, page 332)

The Commission's decision to reject Mr. King's assumptions in Docket No. 990649-TP was reasonable and it should similarly reject Mr. Nilson's assertion here. Mr. King and Mr. Nilson essentially argue that a variety of tasks that in the real world must be done manually could be automated so that a hot cut and most provisioning activities associated with unbundled network elements would involve little more than the flick of a switch. The Commission reasonably found that "non-recurring studies should be forward-looking reflecting efficient practices and systems, but this perspective should be tempered by considerations of what is reasonably achievable." (May 25th Order, page 332) Since the foundation of the cost studies is a forward-looking perspective which anticipates foreseeable process improvements, Mr. Nilson's discussion on pages 31-32 of the timing of the generic cost proceeding and the Supra arbitration with respect to the hot cut process is

immaterial.

Q. HAVE YOU BEEN ABLE TO ESTIMATE THE RELATIVE NONRECURRING COSTS FOR SEPARATING THE COMMISSION-APPROVED AVERAGE LOOP RATE INTO A COPPER/UDLC CATEGORY AND AN IDLC CATEGORY?

A. Yes. Using the original study as a foundation and through discussions with experts familiar with the provisioning process, I have been able to estimate the costs reflective of converting a working UNE-P combination served by copper or UDLC to either an unbundled SL1 or SL2 loop. Furthermore, I have also estimated the costs associated with converting a working UNE-P combination served by IDLC to either an unbundled SL1 or SL2 loop. The input files and output results are attached as Exhibit DDC-1[11]. As I mentioned previously, BellSouth's existing approach is to consider an average loop. Thus, from a purely mathematical perspective, if the first scenario (i.e., a working UNE-P combination served by copper or UDLC converting to either an unbundled SL1 or SL2 loop) produces a cost lower than the current $49.57 rate then the second scenario (i.e., converting a working UNE-P combination served by IDLC to either an unbundled SL1 or SL2 loop) must necessarily be higher. Note that both scenarios reflect a conversion process and assume the loop is currently working. Furthermore, conversions of basic rate ISDN loops have not been considered since these loop types cannot

[11] DDC-1 utilizes the labor rates, gross receipts tax factor and common cost factor ordered by the Commission in Docket No. 990649-TP. Furthermore, the estimate acknowledges the modifications ordered by the Commission to work time estimates.

convert directly to a SL1 of SL2 loop. I also have not performed an analysis of the costs associated with provisioning an unbundled loop if the loop is not currently working in BellSouth's switch. These analyses only reflect costs associated with the loop provisioning portion of the hot cut; cross connect, and service order costs are incremental.

Q. WHAT ARE THE RESULTS OF YOUR ANALYSIS?

A. The table below summarizes the results.

UNE#	Description	1st Loop	Additional
A.1.1	2-Wire Analog Voice Grade Loop – Average Loop	**$ 49.57**	**$ 22.83**
A.22.1	2-Wire Analog Voice Grade Loop - SL 1 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)	$ 19.32	$ 4.32
A.22.2	2-Wire Analog Voice grade Loop - SL 1 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC-available equipment)	$ 99.17	$ 51.65
A.1.2	2-Wire Analog Voice Grade Loop - SL 2 Average Loop	**$ 135.75**	**$ 82.47**
A.22.3	2-Wire Analog Voice Grade Loop - SL 2 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)	$ 50.57	$ 33.37
A.22.4	2-Wire Analog Voice grade Loop - SL 2 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC-available equipment)	$ 139.71	$ 85.83
	Bold - existing rates.		

Note that the nonrecurring cost of converting a working UNE-P served by copper or UDLC to an unbundled SL1 loop is lower than the current rate --- $19.32 compared to $49.57. However, the result is significantly higher than Mr. Nilson's

calculations that produced a $5.27 rate. Moreover, the cost of converting a UNE-P served by IDLC to an unbundled SL1 loop is $99.17 – double the current rate of $49.57. (For UNE-P loops served by IDLC, it was assumed that the terminal equipment required by the NGDLC systems would be available. If not, additional costs apply.) If the Commission adopts this revised rate structure and rates, in order for BellSouth to recover its costs; as allowed by the Section 252 of the Act, these rates must apply to all CLECs, not just Supra. Obviously, the higher rates would prove a detractor to those CLECs whose loops happen to be served by IDLC. Consequently, it disadvantages end-users who just happen to be served by IDLC by possibly reducing their chances to have a choice of service providers.

Q. PLEASE EXPLAIN IN MORE DETAIL HOW BELLSOUTH ARRIVED AT THESE RESULTS.

A. BellSouth network representatives examined the conversion activities that would be necessary for two different scenarios; one in which the working UNE-P loop is served by copper or UDLC and converts to an unbundled SL1 loop and the other in which the working loop is served by IDLC and converts to an unbundled SL1 loop. Activities that differed if the loop was converting to an unbundled SL2 loop were also examined under these two scenarios. Each work group was reviewed separately to determine the functions that would be required in moving a working loop from BellSouth's switch to Supra's collocation space. The cost study for SL1/SL2 loops that the Commission examined in Docket No. 990649-TP was the source for the work time estimates and probabilities analyzed. Some of the probabilities were adjusted to reflect the change in the universe of loops that were

assumed. For example, 1) the original probability for reuse (conversion) was 80% for CWINS; this scenario assumes a 100% reuse rate; 2) the I&M work activities and travel would not be reflected in a non-dispatched situation; 3) probability of fallout for SAC and AFIG is now based on handling conversions only; 4) the percent DLC for application in PICS and I&M/SSI&M work times reflect only percent IDLC that would convert to UDLC or NGDLC. As I stated previously, the original study assumed the loop to be converted could be copper, UDLC or IDLC. The new analysis assumes that the loop is either copper/UDLC or IDLC and thus, some probabilities (which were developed on an average loop basis) had to change. The work times were not updated from those filed in August 2000 in Docket No. 990649-TP with the exception of the WMC which was reduced to 2 minutes. The results in the table also incorporate the modifications ordered by the Commission in Docket No. 990649-TP. Thus, the work center times determined by BellSouth were reduced by the following percentages: SAC – 50%, AFIG – 50%, CPG – 50%, PICS – 45%, UNEC – 45%, SSI&M – 35%, and Central Office – 20%.

Q. ARE THERE OTHER COSTS NOT REFLECTED IN YOUR RESULTS THAT BELLSOUTH WOULD INCUR IF THE COMMISSION ADOPTED THIS RATE STRUCTURE?

A. Yes. There is the real possibility that Supra would submit a conversion order for a loop it believes is served on copper/UDLC which in fact is served by IDLC. Costs associated with reviewing, processing, and returning this order and subsequent CLEC contact to resolve the request are not captured in the costs displayed above.

The potential delay caused by these erroneous orders could cause BellSouth to miss due dates for legitimate requests for which a penalty fee may be levied. It is difficult to quantify the impact of these occurrences and include them in a cost study. Furthermore, BellSouth has not updated the work times for conversions; instead maintaining the times that the Commission has previously reviewed. BellSouth has more recent, more detailed, information that indicates certain inputs have been understated. For example, the central office time was estimated at 15 minutes for an SL1 loop. A review of the steps necessary to provision indicate it actually takes 21 minutes for a conversion. For an SL2 loop conversion two central office technicians are involved to co-ordinate the cut, which was not reflected in the original cost study filed. Thus, the estimates I have given fall short of the actual rates that would be reflected in a full cost study.

Q. MR. NILSON CONTENDS THAT BELLSOUTH IS ATTEMPTING TO CHARGE SUPRA FOR AN "ADSL" CROSS CONNECT DEVELOPED SPECIFICALLY FOR COVAD. (PAGE 44) IS HE CORRECT?

A. No. The cost study for the provisioning of a 2-wire analog collocation cross connect does not differentiate between interconnecting with xDSL loops or SL1 loops. Indeed, the activities associated with the cross connect, and thus the cost, would be the same in either case. Contrary to Mr. Nilson's assertion, there is no such thing as a unique "ADSL cross connect." BellSouth has consistently filed separate rate elements for the loop and the collocation cross connect and the Commission has ordered specific loop nonrecurring rates and specific collocation cross connect nonrecurring rates. Indeed in the very first major arbitration

proceeding (Docket Nos. 960757-TP, 960833-TP, and 960846-TP (MFS, AT&T, and MCI), the Commission established nonrecurring rates for both the bundled loop and the collocation cross connect. Most recently, in Docket No. 981834-TP/990321-TP, the generic collocation docket, BellSouth filed updated nonrecurring cost support for cross connects. However, again there is no distinction between interconnecting (cross connecting) with an xDSL loop versus a SL1/SL2 loop.

Mr. Nilson attempts to bolster his assertion that the cross connect considered in the Covad arbitration is "special," "otherwise it would be addressed in the Generic UNE Docket 990649-TP." (Nilson Direct Testimony, page 45, lines 16-17) The simple reason that collocation elements were not considered in Docket No. 990649-TP was that the Commission had an open docket specifically established to address collocation-related items, such as, terms and conditions, provisioning intervals, and costs/rates. Thus, the Commission chose to exclude all collocation costs/rates issues from the generic UNE cost docket.

Q. ARE "CONNECT & TEST" ACTIVITIES REQUIRED BOTH FOR PROVISIONING THE LOOP AND CROSS CONNECT?

A. Yes. In the generic collocation cost docket the Staff Recommendation contains the following discussion with respect to the cross connect nonrecurring costs (Docket No. 981834-TP/990321-TP, dated July 22, 2004, page 85).

> BellSouth witness Shell responded to AT&T witness Turner's contention that the CLEC is responsible for the provisioning of

> the cross-connect. He explains that when a CLEC's vendor installs a cross-connect, the cross-connect would be terminated on the frame, and BellSouth would run a connecting wire. He further explains that the cross-connect element is actually placing the two wires together. He continues that BellSouth does not actually test the wire being put on the frame, but works with the provider to ensure that both parties are aware of exactly where the wires are terminated.
>
> BellSouth responded that it agrees that AT&T is responsible for hiring a certified vendor to provision cable between the collocation space and the demarcation point. However, BellSouth did not agree that the "Connect and Test" component of the non-recurring charges should be eliminated. BellSouth's response points out that the proposed non-recurring charges are for cross-connects or jumpers that BellSouth installs related to service orders placed by CLECs to connect specific services to the CLEC's collocation space, and have nothing to do with a CLEC's own cable installation.

As this discussion clearly explains, activities that can be labeled "connect & test" in nature are applicable to the provisioning of cross connects. The Commission's September 14, 2004 Order in the collocation docket (Order No. PSC-04-0895-FOF-TP) adopts BellSouth's proposed nonrecurring cross connect charge and thus, by default accepts this position. These same provisioning activities were considered in the Covad cost support. As I explained in my August 16, 2004 deposition, it is my understanding that the Commission's revised cross connect rates will be made available to all CLECs, including Supra. (*See* page 47 of deposition) The 2-wire cross connect nonrecurring rate was set by the Commission at $7.32 (first) and $ 5.37 (additional) in Order No. PSC-04-0895-FOF-TP.

Connect and test activities are also required for loop provisioning. The

Commission performed an extensive review of the ADSL loop nonrecurring costs including connect and test activities in establishing nonrecurring rates in Docket No. 960469-TP and expanded its decision on ADSL loops to all loop types; "it is possible to extrapolate from the record in order to develop an adjustment to the remainder of BellSouth's work groups and elements." (*See May 25th Order*, pages 343-349, 356) While the Commission made adjustments to this category of loop provisioning activities, i.e., Connect & Test activities, it recognized that they were necessary components of the provisioning process.

When a CLEC purchases an unbundled loop, it must also purchase some type of cross connect in order to bring the loop to the collocation space. The decision was made to attribute 15% of the central office work time to the cross connect provisioning and retain 85% with the loop provisioning in the cost study. This fact is clearly supported by the cost study input file (FL-2W.xls) for unbundled loops. Worksheet Connect & Test, lines 44 (SL2 loop input) and 45 (SL1 loop input), column I states that 15% of the costs are carried in other transport elements; i.e., in the cross connects. Furthermore, BellSouth employee Dan Stinson was deposed in Docket No. 990649-TP on this very aspect of the study:

Q. (By Mr. Cutler) What is your understanding of the meaning of that note?
A. The meaning of that note is that 15 percent of the total time given would be charged through another element.
Q. Such as?
A. Co-location cross connect element.

(Deposition of Daniel Eric Stinson, Page 25, dated July 20, 2000, Docket No. 990649-TP)

The sum of the central office work times, however, reflects all of the work that must be done when an unbundled loop and cross connect are ordered ---- there is no duplication of costs. Furthermore, the times associated with the other work groups involved in provisioning the cross connect are incremental to loop provisioning and are directly related to the handling of the cross connect service order. The table below is an extract from the physical collocation input file that documents the work groups and work times recently reviewed and approved by this Commission in the collocation docket.

Work Group	JFC	Function	Hours	Minutes
Circuit Provisioning Group (CPG)	4N4X	Engineering	0.0082	.49
Work Management Center (WMC)	4WXX	Connect & Test	0.0250	1.50
Customer Wholesale Interconnection Network Services (C-WINS) (Formerly UNEC)	4AXX	Connect & Test	0.1136	6.82
CO Install & Mtce Field (SL1)	431X	Connect & Test	0.0375	2.25
CO Install & Mtce Field (SL2)	431X	Connect & Test	0.0500	3.00
Percent SL1 (nondesign)			54.5%	
Percent SL2 (design)			45.5%	
Melded CO Install & Mtce			0.0432	2.59

Indeed, BellSouth's technical description of an unbundled loop (http://interconnection.bellsouth.com/guidelines/unedocs/sl1.pkg.pdf) contains the following: "UVL-SL1 will be delivered to the CLEC at their collocation space **via cross-connect**. The cross-connect **is a separate collocation element**, which may

have **its own additional charge.**" (Emphasis added) This document also contains the following description on an unbundled loop: "The voice grade Unbundled Voice Loop – Service Level 1 (USVL-SL1) is a dedicated analog transmission facility from BellSouth's main distribution frame (MDF) to an end user's premise." Moreover, Supra's interconnection agreement, which was approved by this Commission in Docket No. 001305-TP, states with respect to local loop provisioning: "The provisioning of service to Supra Telecom will require cross-office cabling and cross-connections within the central office to connect the loop to a local switch or other transmission equipment in Collocation Space. **These cross connects are not considered part of the loop.**" (Attachment 2, page 13, §3.2, emphasis added) Thus, Mr. Nilson is incorrect in asserting that the cross connect element "was built into the loop UNE." (Nilson Direct Testimony, page 47, line16) The cross connect element captures the costs associated with providing the connection between BellSouth's MDF and the CLEC's collocation space. Without this element, the transmission path would stop at the MDF and the end-user would not be able to receive or make calls.

Q. MR. NILSON STATES: "THERE IS NO CORRESPONDING UNE CROSSCONNECT IN THE UNE (UNE-P/UNE-L) RATE SECTION IN ATTACHMENT 2." (PAGE 47, LINES 10-11) PLEASE COMMENT.

A. As I stated previously, I was not directly involved in the negotiation of Supra's Agreement. However, even without that level of expertise, it is easy to prove that Mr. Nilson's claim is unfounded. Attachment 2, §3.2 states the following: "The purchase of such cross connects shall be pursuant to Attachment 4, incorporated

herein by reference." Furthermore, Attachment 4, §1.5 states: "Supra Telecom agrees to pay the rates and charges identified at Exhibit A attached hereto" contradicting Mr. Nilson's claim on page 43 that these cross connect charges are not "binding." Page 2 of Exhibit A in Attachment 4 contains the $8.22 charge for a 2-wire cross connect, the alleged "Covad-specific" cross connect. Since Attachment 4 is "incorporated" into the "UNE (UNE-P/UNE-L) rate section" by reference, Mr. Nilson's statement is untrue.

Q. IS THE CROSS CONNECT CHARGE APPLICABLE TO THE PROVISIONING OF A UNE-P LOOP, ORDERED AS A NEW COMBINATION?

A. No. As I have discussed previously, the cross connect is a uniquely defined UNE that specifically captures costs associated with providing interconnection between BellSouth's network and the CLEC's collocation space. A cross connect UNE is required to provision a UNE-L, because the UNE-L must be connected to the CLEC's collocation space. This network design is clearly not the same as the one used for a UNE-P combination, which includes a BellSouth loop combined with a BellSouth switch port.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

FLORIDA

DOCKET 040301-TP

BELLSOUTH TELECOMMUNICATIONS, INC

EXHIBIT DDC-1

OCTOBER 8, 2004

FLORIDA DOCKET NO. 040301-TP
EXECUTIVE SUMMARY
EXHIBIT DDC-1

EXECUTIVE SUMMARY

BellSouth Telecommunications, Inc. (BellSouth) is herewith filing unbundled network element cost estimates as described in BellSouth's Witness D. Daonne Caldwell's rebuttal testimony filed in this proceeding. The attached estimates are based on BellSouth's original cost studies filed in Docket No. 990649-TP and have been modified to include all changes ordered by the Commission in that docket. A complete description of these estimates is included in Ms. Caldwell's testimony.

BellSouth notes that even though these estimates are based on the original cost studies filed in Docket No. 990649-TP, they should not be considered final cost studies. To complete the cost studies, additional costs and updated work times, as described in Ms. Caldwell's testimony, should be included.

Nonrecurring Cost Estimate Summary

Florida

A.22.1 2-Wire Analog Voice Grade Loop - SL 1 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

	Nonrecurring Cost					
	Installation - First			Installation - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$18.0792	$0.0000	$18.0792	$4.0404	$0.0000	$4.0404
OTHER EXPENSES:						
Total Cost	$18.0792	$0.0000	$18.0792	$4.0404	$0.0000	$4.0404
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$18.1102			$4.0473
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$19.3164			$4.3168

Nonrecurring Cost Estimate Summary

Florida

A.22.1 2-Wire Analog Voice Grade Loop - SL 1 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

	Nonrecurring Cost					
	Disconnect - First			Disconnect - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
OTHER EXPENSES:						
Total Cost	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$0.0000			$0.0000
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$0.0000			$0.0000

Source: BSCC 2.6

Nonrecurring Cost Estimate Summary

Florida

A.22.1 2-Wire Analog Voice Grade Loop - SL 1 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	Direct Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0067	0.0000	$34.31	$0.2287	$0.0000	1.0000	$0.0000
			Add'l	0.0067	0.0000		$0.2287	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.2509	0.0000	$38.31	$9.6117	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.1700	0.0000	$42.04	$7.1468	$0.0000	1.0000	$0.0000
			Add'l	0.0907	0.0000		$3.8116	$0.0000		$0.0000
						Total First	$18.0792		Total First	$0.0000
						Total Add'l	$4.0404		Total Add'l	$0.0000

Source: BSCC 2.6

Nonrecurring Cost Estimate Summary

Florida

A.22.1 2-Wire Analog Voice Grade Loop - SL 1 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	TELRIC Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0067	0.0000	$34.31	$0.2287	$0.0000	1.0000	$0.0000
			Add'l	0.0067	0.0000		$0.2287	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.2509	0.0000	$38.31	$9.6117	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.1700	0.0000	$42.04	$7.1468	$0.0000	1.0000	$0.0000
			Add'l	0.0907	0.0000		$3.8116	$0.0000		$0.0000
						Total First	$18.0792		**Total First**	$0.0000
						Total Add'l	$4.0404		**Total Add'l**	$0.0000

Nonrecurring Cost Estimate Summary

Florida

A.22.2 2-Wire Analog Voice grade Loop - SL 1 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

	Nonrecurring Cost					
	Installation - First			Installation - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$92.8142	$0.0000	$92.8142	$48.3455	$0.0000	$48.3455
OTHER EXPENSES:						
Total Cost	$92.8142	$0.0000	$92.8142	$48.3455	$0.0000	$48.3455
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$92.9731			$48.4283
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$99.1655			$51.6538

Nonrecurring Cost Estimate Summary

Florida

A.22.2 2-Wire Analog Voice grade Loop - SL 1 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

	Nonrecurring Cost					
	Disconnect - First			Disconnect - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
OTHER EXPENSES:						
Total Cost	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$0.0000			$0.0000
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$0.0000			$0.0000

Source: BSCC 2.6

Florida

A.22.2 2-Wire Analog Voice grade Loop - SL 1 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	Direct Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	JG57	Job Grade 57	First	0.0001	0.0000	$40.54	$0.0060	$0.0000	1.0000	$0.0000
			Add'l	0.0001	0.0000		$0.0060	$0.0000		$0.0000
ENGINEERING	WS16	Wage Scale 16	First	0.0016	0.0000	$25.85	$0.0418	$0.0000	1.0000	$0.0000
			Add'l	0.0016	0.0000		$0.0418	$0.0000		$0.0000
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0443	0.0000	$34.31	$1.5206	$0.0000	1.0000	$0.0000
			Add'l	0.0443	0.0000		$1.5206	$0.0000		$0.0000
ENGINEERING	JG57	Job Grade 57	First	0.1059	0.0000	$40.54	$4.2930	$0.0000	1.0000	$0.0000
			Add'l	0.1059	0.0000		$4.2930	$0.0000		$0.0000
ENGINEERING	4FXX	Service Advocacy Center (SAC)	First	0.0353	0.0000	$32.62	$1.1515	$0.0000	1.0000	$0.0000
			Add'l	0.0353	0.0000		$1.1515	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.2509	0.0000	$38.31	$9.6117	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.1700	0.0000	$42.04	$7.1468	$0.0000	1.0000	$0.0000
			Add'l	0.0907	0.0000		$3.8116	$0.0000		$0.0000
CONNECT & TEST	410X	Install & Mtce - Pots	First	1.3545	0.0000	$40.26	$54.5309	$0.0000	1.0000	$0.0000
			Add'l	0.9320	0.0000		$37.5210	$0.0000		$0.0000
TRAVEL	410X	Install & Mtce - Pots	First	0.3333	0.0000	$40.26	$13.4200	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
						Total First	$92.8142		Total First	$0.0000
						Total Add'l	$48.3455		Total Add'l	$0.0000

Source: BSCC 2.6

Florida

A.22.2 2-Wire Analog Voice grade Loop - SL 1 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	TELRIC Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	JG57	Job Grade 57	First	0.0001	0.0000	$40.54	$0.0060	$0.0000	1.0000	$0.0000
			Add'l	0.0001	0.0000		$0.0060	$0.0000		$0.0000
ENGINEERING	WS16	Wage Scale 16	First	0.0016	0.0000	$25.85	$0.0418	$0.0000	1.0000	$0.0000
			Add'l	0.0016	0.0000		$0.0418	$0.0000		$0.0000
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0443	0.0000	$34.31	$1.5206	$0.0000	1.0000	$0.0000
			Add'l	0.0443	0.0000		$1.5206	$0.0000		$0.0000
ENGINEERING	JG57	Job Grade 57	First	0.1059	0.0000	$40.54	$4.2930	$0.0000	1.0000	$0.0000
			Add'l	0.1059	0.0000		$4.2930	$0.0000		$0.0000
ENGINEERING	4FXX	Service Advocacy Center (SAC)	First	0.0353	0.0000	$32.62	$1.1515	$0.0000	1.0000	$0.0000
			Add'l	0.0353	0.0000		$1.1515	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.2509	0.0000	$38.31	$9.6117	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.1700	0.0000	$42.04	$7.1468	$0.0000	1.0000	$0.0000
			Add'l	0.0907	0.0000		$3.8116	$0.0000		$0.0000
CONNECT & TEST	410X	Install & Mtce - Pots	First	1.3545	0.0000	$40.26	$54.5309	$0.0000	1.0000	$0.0000
			Add'l	0.9320	0.0000		$37.5210	$0.0000		$0.0000
TRAVEL	410X	Install & Mtce - Pots	First	0.3333	0.0000	$40.26	$13.4200	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
						Total First	$92.8142		Total First	$0.0000
						Total Add'l	$48.3455		Total Add'l	$0.0000

Nonrecurring Cost Estimate Summary

A.22.3 2-Wire Analog Voice Grade Loop - Florida SL 2 Conversion Only (Copper/UDLC) - No Outside Dispatch UNE-P to UNE-L

	Nonrecurring Cost					
	Installation - First			Installation - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$47.3304	$0.0000	$47.3304	$31.2314	$0.0000	$31.2314
OTHER EXPENSES:						
Total Cost	$47.3304	$0.0000	$47.3304	$31.2314	$0.0000	$31.2314
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$47.4114			$31.2849
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$50.5692			$33.3686

Source: BSCC 2.6

Nonrecurring Cost Estimate Summary

Florida

A.22.3 2-Wire Analog Voice Grade Loop - SL 2 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

	Nonrecurring Cost					
	Disconnect - First			Disconnect - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
OTHER EXPENSES:						
Total Cost	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$0.0000			$0.0000
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$0.0000			$0.0000

Source: BSCC 2.6

Florida

A.22.3 2-Wire Analog Voice Grade Loop - SL 2 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	Direct Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	4N4X	Circuit Provisioning Group (CPG)	First	0.0413	0.0000	$33.64	$1.3877	$0.0000	1.0000	$0.0000
			Add'l	0.0225	0.0000		$0.7569	$0.0000		$0.0000
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0067	0.0000	$34.31	$0.2287	$0.0000	1.0000	$0.0000
			Add'l	0.0067	0.0000		$0.2287	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.9160	0.0000	$38.31	$35.0929	$0.0000	1.0000	$0.0000
			Add'l	0.6651	0.0000		$25.4813	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.2267	0.0000	$42.04	$9.5291	$0.0000	1.0000	$0.0000
			Add'l	0.1133	0.0000		$4.7645	$0.0000		$0.0000
						Total First	$47.3304		Total First	$0.0000
						Total Add'l	$31.2314		Total Add'l	$0.0000

Nonrecurring Cost Estimate Summary

Florida

A.22.3 2-Wire Analog Voice Grade Loop - SL 2 Conversion Only - No Outside Dispatch UNE-P to UNE-L (Copper/UDLC)

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	TELRIC Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	4N4X	Circuit Provisioning Group (CPG)	First	0.0413	0.0000	$33.64	$1.3877	$0.0000	1.0000	$0.0000
			Add'l	0.0225	0.0000		$0.7569	$0.0000		$0.0000
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0067	0.0000	$34.31	$0.2287	$0.0000	1.0000	$0.0000
			Add'l	0.0067	0.0000		$0.2287	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.9160	0.0000	$38.31	$35.0929	$0.0000	1.0000	$0.0000
			Add'l	0.6651	0.0000		$25.4813	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.2267	0.0000	$42.04	$9.5291	$0.0000	1.0000	$0.0000
			Add'l	0.1133	0.0000		$4.7645	$0.0000		$0.0000
						Total First	$47.3304		Total First	$0.0000
						Total Add'l	$31.2314		Total Add'l	$0.0000

Source: BSCC 2.6

Florida
A.22.4 2-Wire Analog Voice grade Loop - SL 2 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

	Nonrecurring Cost					
	Installation - First			Installation - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$130.7575	$0.0000	$130.7575	$80.3362	$0.0000	$80.3362
OTHER EXPENSES:						
Total Cost	$130.7575	$0.0000	$130.7575	$80.3362	$0.0000	$80.3362
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$130.9815			$80.4738
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$139.7053			$85.8336

Florida

A.22.4 2-Wire Analog Voice grade Loop - SL 2 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

	Nonrecurring Cost					
	Disconnect - First			Disconnect - Additional		
Description	Direct Cost	Shared Cost	TELRIC	Direct Cost	Shared Cost	TELRIC
Nonrecurring Cost Development Reports	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
OTHER EXPENSES:						
Total Cost	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000
Gross Receipts Tax Factor			X 1.0017			X 1.0017
Cost (Including Gross Recepts Tax)			$0.0000			$0.0000
Common Cost Factor			X 1.0666			X 1.0666
Economic Cost			$0.0000			$0.0000

Nonrecurring Cost Estimate Summary

Florida

A.22.4 2-Wire Analog Voice grade Loop - SL 2 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	Direct Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	4N4X	Circuit Provisioning Group (CPG)	First	0.0413	0.0000	$33.64	$1.3877	$0.0000	1.0000	$0.0000
			Add'l	0.0225	0.0000		$0.7569	$0.0000		$0.0000
ENGINEERING	JG57	Job Grade 57	First	0.0001	0.0000	**$40.54**	**$0.0060**	$0.0000	1.0000	$0.0000
			Add'l	0.0001	0.0000		$0.0060	$0.0000		$0.0000
ENGINEERING	WS16	Wage Scale 16	First	0.0016	0.0000	**$25.85**	$0.0418	$0.0000	1.0000	$0.0000
			Add'l	0.0016	0.0000		$0.0418	$0.0000		$0.0000
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0443	0.0000	$34.31	$1.5206	$0.0000	1.0000	$0.0000
			Add'l	0.0443	0.0000		$1.5206	$0.0000		$0.0000
ENGINEERING	JG57	Job Grade 57	First	0.1059	0.0000	$40.54	$4.2930	$0.0000	1.0000	$0.0000
			Add'l	0.1059	0.0000		$4.2930	$0.0000		$0.0000
ENGINEERING	4FXX	Service Advocacy Center (SAC)	First	0.0353	0.0000	$32.62	$1.1515	$0.0000	1.0000	$0.0000
			Add'l	0.0353	0.0000		$1.1515	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.9160	0.0000	$38.31	$35.0929	$0.0000	1.0000	$0.0000
			Add'l	0.6651	0.0000		$25.4813	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.2267	0.0000	$42.04	$9.5291	$0.0000	1.0000	$0.0000
			Add'l	0.1133	0.0000		$4.7645	$0.0000		$0.0000
CONNECT & TEST	411X	Install & Mtce - Spec Svcs (SSIM)	First	1.3545	0.0000	$45.41	$61.5064	$0.0000	1.0000	$0.0000
			Add'l	0.9320	0.0000		$42.3207	$0.0000		$0.0000
TRAVEL	411X	Install & Mtce - Spec Svcs (SSIM)	First	0.3333	0.0000	$45.41	$15.1367	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
						Total First	$130.7575		**Total First**	$0.0000
						Total Add'l	$80.3362		**Total Add'l**	$0.0000

Source: BSCC 2.6

Florida

A.22.4 2-Wire Analog Voice grade Loop - SL 2 Conversion Only - 100% Dispatch UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC- available equipment

				A	B	C	D=AxC	E=BxC	F	G=ExF
Function	JFC/ Payband	JFC/Payband Description	NRC Type	Installation Worktimes	Disconnect Worktimes	TELRIC Labor Rate	Installation Cost	Disconnect Cost	Disconnect Discount Factor	Discounted Disconnect Cost
ENGINEERING	4N4X	Circuit Provisioning Group (CPG)	First	0.0413	0.0000	$33.64	$1.3877	$0.0000	1.0000	$0.0000
			Add'l	0.0225	0.0000		$0.7569	$0.0000		$0.0000
ENGINEERING	JG57	Job Grade 57	First	0.0001	0.0000	$40.54	$0.0060	$0.0000	1.0000	$0.0000
			Add'l	0.0001	0.0000		$0.0060	$0.0000		$0.0000
ENGINEERING	WS16	Wage Scale 16	First	0.0016	0.0000	$25.85	$0.0418	$0.0000	1.0000	$0.0000
			Add'l	0.0016	0.0000		$0.0418	$0.0000		$0.0000
ENGINEERING	4M1X	Address & Facility Inventory (AFIG)	First	0.0443	0.0000	$34.31	$1.5206	$0.0000	1.0000	$0.0000
			Add'l	0.0443	0.0000		$1.5206	$0.0000		$0.0000
ENGINEERING	JG57	Job Grade 57	First	0.1059	0.0000	$40.54	$4.2930	$0.0000	1.0000	$0.0000
			Add'l	0.1059	0.0000		$4.2930	$0.0000		$0.0000
ENGINEERING	4FXX	Service Advocacy Center (SAC)	First	0.0353	0.0000	$32.62	$1.1515	$0.0000	1.0000	$0.0000
			Add'l	0.0353	0.0000		$1.1515	$0.0000		$0.0000
CONNECT & TEST	4AXX	Acc Cust Advocate Cntr (ACAC)	First	0.9160	0.0000	$38.31	$35.0929	$0.0000	1.0000	$0.0000
			Add'l	0.6651	0.0000		$25.4813	$0.0000		$0.0000
CONNECT & TEST	4WXX	Work Management Center (WMC)	First	0.0333	0.0000	$32.76	$1.0920	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
CONNECT & TEST	431X	CO Install & Mtce Field - Ckt & Fac	First	0.2267	0.0000	$42.04	$9.5291	$0.0000	1.0000	$0.0000
			Add'l	0.1133	0.0000		$4.7645	$0.0000		$0.0000
CONNECT & TEST	411X	Install & Mtce - Spec Svcs (SSIM)	First	1.3545	0.0000	$45.41	$61.5064	$0.0000	1.0000	$0.0000
			Add'l	0.9320	0.0000		$42.3207	$0.0000		$0.0000
TRAVEL	411X	Install & Mtce - Spec Svcs (SSIM)	First	0.3333	0.0000	$45.41	$15.1367	$0.0000	1.0000	$0.0000
			Add'l	0.0000	0.0000		$0.0000	$0.0000		$0.0000
						Total First	$130.7575		**Total First**	$0.0000
						Total Add'l	$80.3362		**Total Add'l**	$0.0000

	A	B	C	D	E	F	G	H	I	J	K
1	Florida										
2	Index Sheet										
3	Study Period: Study Period: 2000-2002										
4											
5											
6											
7											
8											
9			**Sheet Name:**		**Description:**						
10			Index		2 Wire - Voice Grade Loop - SL1 - Loop Conversions - Nonrecurring						
11			Nonrecurring Labor		CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES						
12			WP100		Nonrecurring Worktimes						
13			INPUTS_ENGINEERING		Detailed Labor Worktimes						
14			INPUTS_CONNECT&TEST		Detailed Labor Worktimes						
15			INPUTS_TRAVEL		Detailed Labor Worktimes						
16			INPUTS_MISC		Miscellaneous Inputs						
17											
18		Element(s) In this Study:			A.22.1. A.22.2						
19											
20											
21											
22											
23											

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	Index	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES													
2															
3		Instructions:													
4		**1. Use this** worksheet to record nonrecurring labor times to be input into the Calculator calculations.													
5		**2. All amount**s shown are per unit (e.g., per call, per loop, per MOU).													
6		**3. Input data**, by Cost Element, leaving no blank lines. On next row													
7		**after last lin**e of data, type END in Cost Element Column.													
8		**4. All data on** this form should be cell-referenced to study workpapers.													
9		**5. Do NOT change columns, headings, sheet name.**													
10		6. Use columns F & G when cost element has a single nonrecurring cost; use columns H, I, J, & K for elements with a first													
11		**and additional nonrecurring cost; use columns L, M, N & O for elements with an initial and subsequent nonrecurring cost.**													
12		7. Input Cost Element Life (in months) on first row of data for each cost element. It is not necessary to repeat on each line.													
13															
14															
15	Study Mid-Point Date (Mos.)			6/1/2001											
16															
17							(For use w/ one NR)		First	First	Additional	Additional	Initial	Initial	Subsequent	Subsequent
18			Cost			Installation	Disconnect	First Installation	Disconnect	Additional Installation	Additional Disconnect	Initial Installation	Initial Disconnect	Subsequent Installation	Subsequent Disconnect
19		Cost	Element	Labor Expense Description	JFC/	Time	Time	Time	Time	Time	Time	Time	Time	Time	Time
20	State	Element #	Life (Mo)	(Limited to 25 characters)	Payband	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours
21	FL	A.22.1		ENGINEERING	4M1X			0.0067		0.0067					
22	FL	A.22.1		CONNECT & TEST	4AXX			0.2509		0.0000					
23	FL	A.22.1		CONNECT & TEST	4WXX			0.0333		0.0000					
24	FL	A.22.1		CONNECT & TEST	431X			0.1700		0.0907					
25	FL	A.22.2		ENGINEERING	JG57			0.0001		0.0001					
26	FL	A.22.2		ENGINEERING	WS16			0.0016		0.0016					
27	FL	A.22.2		ENGINEERING	4M1X			0.0443		0.0443					
28	FL	A.22.2		ENGINEERING	JG57			0.1059		0.1059					
29	FL	A.22.2		ENGINEERING	4FXX			0.0353		0.0353					
30	FL	A.22.2		CONNECT & TEST	4AXX			0.2509		-					
31	FL	A.22.2		CONNECT & TEST	4WXX			0.0333		-					
32	FL	A.22.2		CONNECT & TEST	431X			0.1700		0.0907					
33	FL	A.22.2		CONNECT & TEST	410X			1.3545		0.9320					
34	FL	A.22.2		TRAVEL	410X			0.3333		-					
35															
36		END													
37															

	A	B	C	D	E	F	G	H	I	J	K
1	Florida										
2	Nonrecurring Worktimes										
3	Study Period: Study Period: 2000-2002										
4	Index										
5											
6	A.22.1	2-Wire Analog Voice Grade Loop - Service Level 1									
7		Conversion Only - No Outside Dispatch									
8		UNE-P to UNE-L (Copper/UDLC)									
9											
10				Worktimes (Min.)				Worktimes (Hrs.)			
11	Source (* FL Change)	Description	WS	Install		Install		First Install		Install	
12	INPUTS_ENGINEERING, Lns E13*I13*J13	ENGINEERING	4M1X	0.40		0.40		0.0067		0.0067	
13	INPUTS_CONNECT&TEST, Lns ((E14*I14)+(E16*I16)+(E17*I17)+(E18*I18))*K14	CONNECT & TEST	4AXX	15.05		0.00		0.2509		0.0000	
14	INPUTS_CONNECT&TEST, Lns E35	CONNECT & TEST	4WXX	2.00		0.00		0.0333		0.0000	
15	INPUTS_CONNECT&TEST, Lns E39*I39*K39	CONNECT & TEST	431X	10.20		5.44		0.1700		0.0907	
16											
17											
18											
19	A.22.2	2-Wire Analog Voice Grade Loop - Service Level 1									
20		Conversion Only - 100% Dispatch									
21		UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC - available terminal equipment)									
22											
23				Worktimes (Min.)				Worktimes (Hrs.)			
24	Source (* FL Change)	Description	JFC / JG / WS	First Install		Addtl Install		First Install		Addtl Install	
25	INPUTS_ENGINEERING, Lns (E19*I19*M19)*C18*N18	ENGINEERING	JG57	0.01		0.01		0.0001		0.0001	
26	INPUTS_ENGINEERING, Lns ((E20*I20*M20*C18)+(E21*I21*M20*C18))*N18	ENGINEERING	WS16	0.10		0.10		0.0016		0.0016	
27	INPUTS_ENGINEERING, Lns E14*I14*J13	ENGINEERING	4M1X	2.66		2.66		0.0443		0.0443	
28	INPUTS_ENGINEERING, Lns E7*I7*J7	ENGINEERING	JG57	6.35		6.35		0.1059		0.1059	
29	INPUTS_ENGINEERING, Lns E8*I8*J7	ENGINEERING	4FXX	2.12		2.12		0.0353		0.0353	
30	INPUTS_CONNECT&TEST, Lns ((E14*I14)+(E15*I15)+(E16*I16)+(E17*I17)+(E18*I18))*K14	CONNECT & TEST	4AXX	15.05		0.00		0.2509		0.0000	
31	INPUTS_CONNECT&TEST, Lns E35	CONNECT & TEST	4WXX	2.00		0.00		0.0333		0.0000	
32	INPUTS_CONNECT&TEST, Lns E39*I39*K39	CONNECT & TEST	431X	10.20		5.44		0.1700		0.0907	
33	INPUTS_CONNECT&TEST, Lns ((E24*J24)+(E25*J25*C22)+(E26*J26)+(E27*J27)+(E28*I28*J28)+(E30*I30*J30)+(E29*J29)+(E31*J31))*K24	CONNECT & TEST	410X	81.27		55.92		1.3545		0.9320	
34	INPUTS_TRAVEL, Lns E7*I7	TRAVEL	410X	20.00		0.00		0.3333		0.0000	
35											
36											

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	**Florida**													
2	**Detailed Labor Worktimes**													
3	**Study Period: Study Period: 2000-2002**													
4														
5	**Item/Description**				**Worktimes (Min.)**									
6	**SERVICE ADVOCACY CENTER (SAC)**	**Source**	**Description**	**JG / WS**	**First Install**		**Addtl Install**		**Probability (Fallout) - Misc. Inputs Line C22**	**FPSC Ordered Adjustment (100% - Adj)**				
7	Reviews request and handles request for manual assistance (RMA)	Network	ENGINEERING	JG57	45.00		45.00		28.24%	50%				
8	Reviews request and handles request for manual assistance (RMA)	Network	ENGINEERING	4FXX	15.00		15.00		28.24%					
9	(See Note 1)													
10														
11	**Item/Description**				**Worktimes (Min.)**									
12	**ADDRESS AND FACILITY INVENTORY (AFIG)**	**Source**	**Description**	**JG / WS**	**First Install**		**Addtl Install**		**Probability (Fallout) - Misc. Inputs Lines C16 & C18**	**FPSC Ordered Adjustment (100% - Adj)**				
13	Assigns loop facilities (no outside dispatch)	Network	ENGINEERING	4M1X	8.00		8.00		10.00%	50%				
14	Assigns loop facilities (100% dispatch)	Network	ENGINEERING	4M1X	8.00		8.00		66.48%					
15														
16														
17	**NETWORK PLUG-IN ADMINISTRATION (PICS)**	**Source**	**Description**	**JG / WS**	**First Install**		**Addtl Install**		**Probability First Install**		**Probability Addtl Install**		**Worktimes Occur Only on Backorders - Backorder Fallout 3%**	**FPSC Ordered Adjustment (100% - Adj)**
18	% UDLC/NGDLC	=(INPUTS_MISC C10)	36.62%											55%
19	Planner orders plug-in when not in stock	Network	ENGINEERING	JG57	15.00		15.00		10%		10%		3%	
20	Clerical functions in connection with handling of plug-in order	Network	ENGINEERING	WS16	15.00		15.00		90%		90%		3%	
21	Problem resolution of plug-in order	Network	ENGINEERING	WS16	30.00		30.00		10%		10%		3%	
22														
23														
24														
25														
26	Note 1 - List of SAC Activities													
27	Review request & handle request for manual assistance													
28	Outside Plant Engineering Investigation & Loop Make-up Lookup													
29	Build Loop Make-Up (if applicable)													
30	Assign Order													
31	Coordinate w/ Internal Organizations (UNEC, LCSC)													
32	Field Assistance													
33														
34	(These activities can involve both the engineering and clerical staff)													
35														
36														

	A	B	C	D	E	F	G	H	I	J	K	L
1	**Florida**											
2	**Detailed Labor Worktimes**											
3	**Study Period: Study Period: 2000-2002**											
4												
5	**Item/Description**				**Worktimes (Min.)**							
6	**Unbundled Network Element Center (UNEC) Work Activities**	**Source**	**Description**	**JG / WS**	**First Install**		**Addtl Install**		**Probability of Occurrence**		**FPSC Ordered Adjustment (100% - Adj)**	
7	**Provisioning Variables**											
8	(1) Status/Info (55% of orders at 2.4 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	2.40		0.00		55%			
9	(2) Escalations (12% of orders at 7.2 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	7.20		0.00		12%			
10	(3) Assist Calls (6% of orders at 15.6 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	15.60		0.00		6%			
11	(4) Jeopardy (25% of orders at 1.8 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	1.80		0.00		25%			
12	**Total of Worktimes * Probabilities**				**3.57**		0.00					
13												
14	UNEC pulls order information and assigns to work groups.	Interconn Svcs.	CONNECT & TEST	4AXX	8.00		0.00		100%		55%	
15	Provisioning variables - when UNEC pulls order information (Row 12)	Interconn Svcs.	CONNECT & TEST	4AXX	0.00		0.00		0%			
16	Ensures CO dispatch & monitor report (of both CO & outside if applicable)	Interconn Svcs.	CONNECT & TEST	4AXX	5.00		0.00		100%			
17	UNEC contacts customer and completes order	Interconn Svcs.	CONNECT & TEST	4AXX	10.80		0.00		100%			
18	**Provisioning Variables - when UNEC contacts customer and** completes order (Row 12)	Interconn Svcs.	CONNECT & TEST	4AXX	3.57		0.00		100%			
19												

	A	B	C	D	E	F	G	H	I	J	K	L
20	Item/Description				Worktimes (Min.)							
21	INSTALLATION AND MAINTENANCE (I&M) WORK ACTIVITIES	Source	Description	IM JG / WS	First Install		Addtl Install		Probability of Trouble Resolution	Probability of Dispatch	FPSC Ordered Adjustment (100% - Adj)	
22	% UDLC/NGDLC	=INPUTS-MISCIC10	35.62%									
23												
24	Processes requests	Network	CONNECT & TEST	410X	20.00		0.00			100%	65%	
25	Places plug-in at remote terminal	Network	CONNECT & TEST	410X	19.00		19.00			100%		
26	Places cross-connect at crossbox	Network	CONNECT & TEST	410X	16.00		16.00			100%		
27	Checks continuity and dial tone	Network	CONNECT & TEST	410X	15.00		15.00			100%		
28	Trouble resolution at crossbox	Network	CONNECT & TEST	410X	45.00		45.00		30%	100%		
29	Tests from NID & Tagging loop	Network	CONNECT & TEST	410X	23.00		23.00			100%		
30	Trouble resolution at premises	Network	CONNECT & TEST	410X	56.00		56.00		21%	100%		
31	Completes order	Network	CONNECT & TEST	410X	19.00		0.00			100%		
32												
33	Item/Description				Worktimes (Min.)							
34	WORK MANAGEMENT CENTER (WMC)	Source	Description	JG / WS	First Install		Addtl Install					
35	WMC coordinates dispatched technicians (CO or outside)	Network	CONNECT & TEST	4WXX	2.00		0.00					
36												
37	Item/Description				Worktimes (Min.)							
38	CENTRAL OFFICE FORCES (CO)	Source	Description	JG / WS	First Install		Addtl Install		Probability of Occurrence (15% in H,1,9)		FPSC Ordered Adjustment (100% - Adj)	
39	CO Field wires circuit at collocation site	Network	CONNECT & TEST	431X	15.00		8.00		85%		80%	
40												
41	List of CO Activities											
42	Conversion Without Coordination	# of Minutes										
43	Print Order	2										
44	Testing Existing Circuit (Pre-Test)	2										
45	Install Wire (Pre-Wire)	6										
46	Plug-In Eq Options & Placement (if applicable)	5										
47	Test Pre-Wire											
48	Cut Circuit	2										
49	Post-Cut Circuit Test	2										
50	Update Dispatch System	2										
51	Total # of CO Minutes w/o Plug-In ==>	26										

	A	B	C	D	E	F	G	H	I
1	**Florida**								
2	**Detailed Labor Worktimes**								
3	**Study Period: Study Period: 2000-2002**								
4	Index								
5	**Item/Description**				**Worktimes (Min.)**				
6	**INSTALLATION AND MAINTENANCE (I&M) WORK ACTIVITIES**	**Source**	**Description**	**IM JG / WS**	**First Install**		**Addtl Install**		**Probability of Dispatch**
7	Dispatched to crossbox	Network	TRAVEL	410X	20.00		0.00		100%

	A	B	C
1	**Florida**		
2	**Miscellaneous Inputs**		
3	**Study Period: Study Period: 2000-2002**		
4	Index		
5			
6	**Input Description**	**Source**	**Amount**
7			
8	% DLC (combined study)	FL-2w.xls, Inputs_Misc, Line C7	55.00%
9			
10	% UDLC/NGDLC (of DLC Systems)	Network	35.62%
11			
12	% IDLC (of DLC Systems)	Network	64.38%
13			
14	% RMA for AFIG-Combined	FL-2w.xls, Inputs-Engineering, Line I12	30.00%
15			
16	% RMA for AFIG-No Outside Dispatch	Network	10.00%
17			
18	% RMA for AFIG-100% Dispatch	See Note 1	66.48%
19			
20	% RMA for SAC - Combined	FL-2w.xls, Inputs-Engineering, Line I7	10.00%
21			
22	% RMA for SAC - 100% Dispatch	See Note 2	28.24%
23			
24	% Copper	1-C8	45.00%
25			
26	% Copper and UDLC	C24 + (C8 * C10)	64.59%
27			
28	% IDLC	1 - C26	35.41%
29			
30	**Note 1 (formula):**	**Note 2 (formula):**	
31	(.1 * .6459) + (x * .3541) = .30 (combine	(0 * .6459) + (x * .3541) = .10 (combined)	
32	.0646 + .3541x = .30	.3541x = .10	
33	.3541x = .30 - .0646	x = .10 / .3541	
34	.3541x = .2354	x = .2824	
35	x =.2354 / .3541		
36	x = .6648		

	A	B	C	D	E	F	G	H	I	J	K
1	Florida										
2	Index Sheet										
3	Study Period: Study Period: 2000-2002										
4											
5											
6											
7											
8											
9			**Sheet Name:**		**Description:**						
10			Index		2 Wire - Voice Grade Loop - SL2 - Loop Conversions - Nonrecurring						
11			Nonrecurring Labor		CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES						
12			WP100		Nonrecurring Worktimes						
13			INPUTS_ENGINEERING		Detailed Labor Worktimes						
14			INPUTS_CONNECT&TEST		Detailed Labor Worktimes						
15			INPUTS_TRAVEL		Detailed Labor Worktimes						
16			INPUTS_MISC		Miscellaneous Inputs						
17											
18		Element(s) In this Study:			A.22.3, A.22.4						
19											
20											
21											
22											
23											

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	Index	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES													
2															
3		Instructions:													
4		1. Use this worksheet to record nonrecurring labor times to be input into the Calculator calculations.													
5		2. All amounts shown are per unit (e.g., per call, per loop, per MOU).													
6		3. Input data, by Cost Element, leaving no blank lines. On next row													
7		after last line of data, type END in Cost Element Column.													
8		4. All data on this form should be cell-referenced to study workpapers.													
9		5. Do NOT change columns, headings, sheet name.													
10		6. Use columns F & G when cost element has a single nonrecurring cost; use columns H, I, J, & K for elements with a first													
11		and additional nonrecurring cost; use columns L, M, N & O for elements with an initial and subsequent nonrecurring cost.													
12		7. Input Cost Element Life (in months) on first row of data for each cost element. It is not necessary to repeat on each line.													
13															
14															
15	Study Mid-Point Date (Mos.)			6/1/2001											
16															
17						(For use w/ one NR)		First	First	Additional	Additional	Initial	Initial	Subsequent	Subsequent
18			Cost			Installation	Disconnect	Installation	Disconnect	Installation	Disconnect	Installation	Disconnect	Installation	Disconnect
19		Cost	Element	Labor Expense Description	JFC/	Time	Time	Time	Time	Time	Time	Time	Time	Time	Time
20	State	Element #	Life (Mo)	(Limited to 25 characters)	Payband	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours	(Hours)	Hours
21	FL	A.22.3		ENGINEERING	4N4X			0.0413		0.0225					
22	FL	A.22.3		ENGINEERING	4M1X			0.0067		0.0067					
23	FL	A.22.3		CONNECT & TEST	4AXX			0.9160		0.6651					
24	FL	A.22.3		CONNECT & TEST	4WXX			0.0333		0.0000					
25	FL	A.22.3		CONNECT & TEST	431X			0.2267		0.1133					
26	FL	A.22.4		ENGINEERING	4N4X			0.0413		0.0225					
28	FL	A.22.4		ENGINEERING	WS16			0.0016		0.0016					
29	FL	A.22.4		ENGINEERING	4M1X			0.0443		0.0443					
30	FL	A.22.4		ENGINEERING	JG57			0.1059		0.1059					
31	FL	A.22.4		ENGINEERING	4FXX			0.0353		0.0353					
32	FL	A.22.4		CONNECT & TEST	4AXX			0.9160		0.6651					
33	FL	A.22.4		CONNECT & TEST	4WXX			**0.0333**		-					
34	FL	A.22.4		CONNECT & TEST	431X			0.2267		0.1133					
35	FL	A.22.4		CONNECT & TEST	411X			1.3545		0.9320					
36	FL	A.22.4		TRAVEL	411X			0.3333		-					
37															
38		END													
39															
40				Maximum of 25 entries per Cost Element #											

	A	B	C	D	E	F	G	H	I	J	K
1	Florida										
2	Nonrecurring Worktimes										
3	Study Period: Study Period: 2000-2002										
4	Index										
5											
6	A.22.3	2-Wire Analog Voice Grade Loop - Service Level 2									
7		Conversion Only - No Outside Dispatch									
8		UNE-P to UNE-L (Copper/UDLC)									
9											
10				Worktimes (Min.)				Worktimes (Hrs.)			
11	Source (* FL Change)	Description	JFC / JG / WS	First Install		Addtl Install		First Install		Addtl Install	
12	INPUTS_ENGINEERING, Lns ((E18*I18)+(E19*I19))*N18	ENGINEERING	4N4X	2.48		1.35		0.0413		0.0225	
13	INPUTS_ENGINEERING, Lns E13*I13*J13	ENGINEERING	4M1X	0.40		0.40		0.0067		0.0067	
14	INPUTS_CONNECT&TEST, Lns ((E14)+(E16)+(E17*J17)+(E18*K18)+(E19*I19)+(E21*J21)+(E22)+(E23))*L14	CONNECT & TEST	4AXX	54.96		39.91		0.9160		0.6651	
15	INPUTS_CONNECT&TEST, Lns E40	CONNECT & TEST	4WXX	2.00		0.00		0.0333		0.0000	
16	INPUTS_CONNECT&TEST, Lns E44*I44*K44	CONNECT & TEST	431X	13.60		6.80		0.2267		0.1133	
17											
18											
19	A.22.4	2-Wire Analog Voice Grade Loop - Service Level 2									
20		Conversion Only - 100% Dispatch									
21		UNE-P to UNE-L (IDLC to Copper/UDLC/NGDLC - available terminal equipment)									
22											
23				Worktimes (Min.)				Worktimes (Hrs.)			
24	Source (* FL Change)	Description	JFC / JG / WS	First Install		Addtl Install		First Install		Addtl Install	
25	INPUTS_ENGINEERING, Lns ((E18*I18)+(E19*I19))*N18	ENGINEERING	4N4X	2.48		1.35		0.0413		0.0225	
26	INPUTS_ENGINEERING, Lns (E24*I24*M24)*C23*N23	ENGINEERING	JG57	0.01		0.01		0.0001		0.0001	
27	INPUTS_ENGINEERING, Lns ((E25*I25*M25*C23)+(E26*I26*M25*C23))*N23	ENGINEERING	WS16	0.10		0.10		0.0016		0.0016	
28	INPUTS_ENGINEERING, Lns E14*I14*J13	ENGINEERING	4M1X	2.66		2.66		0.0443		0.0443	
29	INPUTS_ENGINEERING, Lns E7*I7*J7	ENGINEERING	JG57	6.35		6.35		0.1059		0.1059	
30	INPUTS_ENGINEERING, Lns E8*I8*J7	ENGINEERING	4FXX	2.12		2.12		0.0353		0.0353	
31	INPUTS_CONNECT&TEST, Lns ((E14)+(E16)+(E17*J17)+(E18*K18)+(E19*I19)+(E21*J21)+(E22)+(E23))*L14	CONNECT & TEST	4AXX	54.96		39.91		0.9160		0.6651	
32	INPUTS_CONNECT&TEST, Lns E40	CONNECT & TEST	4WXX	2.00		0.00		0.0333		0.0000	
33	INPUTS_CONNECT&TEST, Lns E44*I44*K44	CONNECT & TEST	431X	13.60		6.80		0.2267		0.1133	
34	INPUTS_CONNECT&TEST, Lns ((E29*J29)+(E30*J30*C27)+(E31*J31)+(E32*J32)+(E33*I33*J33)+(E34*J34)+(E35*I35*J35)+(E36*J36))*K29	CONNECT & TEST	411X	81.27		55.92		1.3545		0.9320	
35	INPUTS_TRAVEL, Lns E7*I7	TRAVEL	411X	20.00		0.00		0.3333		0.0000	
36											
37											
38											

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Florida													
2	Detailed Labor Worktimes													
3	Study Period: Study Period: 2000-2002													
4	Index													
5	Item/Description				Worktimes (Min.)									
6	SERVICE ADVOCACY CENTER (SAC)	Source	Description	JG / WS	First Install		Addtl Install		Probability (Fallout) - Misc. Inputs Line C22	FPSC Ordered Adjustment (100% - Adj)				
7	Reviews request and handles request for manual assistance (RMA).	Network	ENGINEERING	JG57	45.00		45.00		28.24%	50%				
8	Reviews request and handles request for manual assistance (RMA).	Network	ENGINEERING	4FXX	15.00		15.00		28.24%					
9	(See Note 1)													
10														
11	Item/Description				Worktimes (Min.)									
12	ADDRESS AND FACILITY INVENTORY (AFIG)	Source	Description	JG / WS	First Install		Addtl Install		(Fallout) - Mis. Inputs Lines C15 & C18	FPSC Ordered Adjustment (100% - Adj)				
13	Assigns loop facilities (no outside dispatch)	Network	ENGINEERING	4M1X	8.00		8.00		10.00%	50%				
14	Assigns loop facilities (100% dispatch)	Network	ENGINEERING	4M1X	8.00		8.00		66.48%					
15														
16														
17	CIRCUIT PROVISIONING GROUP (CPG)	Source	Description	JG / WS	First Install		Addtl Install		Probability First Install		Probability Addtl Install			FPSC Ordered Adjustment (100% - Adj)
18	Processes request.	Network	ENGINEERING	4N4X	15.00		0.00		15%		0%			50%
19	Designs circuit and generates DLR and WORD document for CLEC and Field.	Network	ENGINEERING	4N4X	18.00		18.00		15%		15%			
20														
21														
22	NETWORK PLUG-IN ADMINISTRATION (PICS)	Source	Description	JG / WS	First Install		Addtl Install		Probability First Install		Probability Addtl Install		Worktimes Occur Only on Backorders - Backorder Fallout 3%	FPSC Ordered Adjustment (100% - Adj)
23	% UDLC/NGDLC	=(INPUTS_ MISC C10)	35.52%											55%
24	Planner orders plug-in when not in stock	Network	ENGINEERING	JG57	15.00		15.00		10%		10%		3%	
25	Clerical functions in connection with handling of plug-in order	Network	ENGINEERING	WS16	15.00		15.00		90%		90%		3%	
26	Problem resolution of plug-in order	Network	ENGINEERING	WS16	30.00		30.00		10%		10%		3%	
27														
28														
29	Note 1 - List of SAC Activities													
30	Review request & handle request for manual assistance													
31	Outside Plant Engineering Investigation & Loop Make-up Lookup													
32	Build Loop Make-Up (if applicable)													
33	Assign Order													
34	Coordinate w/ Internal Organizations (UNEC, LCSC)													
35	Field Assistance													
36														
37	(These activities can involve both the engineering and clerical staff)													
38														
39														
40														

	A	B	C	D	E	F	G	H	I	J	K	L
1	**Florida**											
2	**Detailed Labor Worktimes**											
3	**Study Period: Study Period: 2000-2002**											
4	[illegible]											
5	**Item/Description**				Worktimes (Min.)							
6	**Unbundled Network Element Center (UNEC) Work Activities**	**Source**	**Description**	**JG / WS**	**First Install**		**Addl Install**		**Probability of Occurrence**	**Probability of Reuse**	**Probability of Outside Dispatch**	**FPSC Ordered Adjustment (100% - Adj)**
7	**Provisioning Variables**											
8	(1) Status/Info (55% of orders at 2.4 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	2.40		0.00		55%			
9	(2) Escalations (12% of orders at 7.2 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	7.20		0.00		12%			
10	(3) Assist Calls (6% of orders at 15.6 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	15.60		0.00		6%			
11	(4) Jeopardy (25% of orders at 1.8 min.)	Interconn Svcs.	CONNECT & TEST	4AXX	1.80		0.00		25%			
12	**Total of Worktimes * Probabilities**				**3.57**		0.00					
13												
14	UNEC pulls order information and assigns to work groups.	Interconn Svcs.	CONNECT & TEST	4AXX	8.00		0.00					55%
15	Provisioning variables - when UNEC pulls order information (Row 12)	Interconn Svcs.	CONNECT & TEST	4AXX	0.00		0.00					
16	Verifies and ensures accuracy of order design	Interconn Svcs.	CONNECT & TEST	4AXX	3.00		3.00					
17	Creates cut sheets to verify reuse of facilities	Interconn Svcs.	CONNECT & TEST	4AXX	4.00		4.00			100%		
18	Ensures CO dispatch & monitor report (or both CO & outside if applicable)	Interconn Svcs.	CONNECT & TEST	4AXX	5.00		0.00				100%	
19	Performs frame continuity and due date coordination and testing	Interconn Svcs.	CONNECT & TEST	4AXX	53.60		53.60		85%			
20	Provisioning variables - testing (Row 12)	Interconn Svcs.	CONNECT & TEST	4AXX	0.00		0.00		85%			
21	Performs manual order coordination (remote call forward, disconnect and unbundled loop order) when service is converted on existing facilities	Interconn Svcs.	CONNECT & TEST	4AXX	20.00		20.00			100%		
22	UNEC contacts customer and completes order	Interconn Svcs.	CONNECT & TEST	4AXX	10.80		0.00					
23	Provisioning Variables - when UNEC contacts customer and completes order (Row 12)	Interconn Svcs.	CONNECT & TEST	4AXX	3.57		0.00					
24												

	A	B	C	D	E	F	G	H	I	J	K	L
25	Item/Description				Worktimes (Min.)							
26	SPECIAL SERVICES INSTALLATION & MAINTENANCE (SSI&M) WORK ACTIVITIES	Source	Description	SSIM JG /WS	First Install		Addtl Install		Probability of Trouble Resolution	Probability of Dispatch	FPSC Ordered Adjustment (100% - Adj)	
27	% UDLC/NGDLC	=INPUTS-MISCIC10	36.62%									
28												
29	Processes requests	Network	CONNECT & TEST	411X	20.00		0.00			100%	86%	
30	Places plug-in at remote terminal	Network	CONNECT & TEST	411X	19.00		19.00			100%		
31	Places cross-connect at crossbox	Network	CONNECT & TEST	411X	16.00		16.00			100%		
32	Checks continuity and dial tone	Network	CONNECT & TEST	411X	15.00		15.00			100%		
33	Trouble resolution at crossbox	Network	CONNECT & TEST	411X	45.00		45.00		30%	100%		
34	Tests from NID & Tagging loop	Network	CONNECT & TEST	411X	23.00		23.00			100%		
35	Trouble resolution at premises	Network	CONNECT & TEST	411X	56.00		56.00		21%	100%		
36	Completes order	Network	CONNECT & TEST	411X	19.00		0.00			100%		
37												
38	Item/Description				Worktimes (Min.)							
39	WORK MANAGEMENT CENTER (WMC)	Source	Description	JG / WS	First Install		Addtl Install					
40	WMC coordinates dispatched technicians (CO or outside)	Network	CONNECT & TEST	4WXX	2.00		0.00					
41												
42	Item/Description				Worktimes (Min.)							
43	CENTRAL OFFICE FORCES (CO)	Source	Description	JG / WS	First Install		Addtl Install		Probability of Occurrence (15% in H.1.9)		FPSC Ordered Adjustment (100% - Adj)	
44	CO Field wires circuit at collocation site.	Network	CONNECT & TEST	431X	20.00		10.00		85%		97%	
45												
46	List of CO Activities	Frame Attendant	Electronic Technician									
47	Conversion With Coordination	# of Minutes	# of Minutes									
48	Print Order	2	5									
49	Testing Existing Circuit (Pre-Test)	2										
50	Install Wire (Pre-Wire)	6	15									
51	Plug-in Eq Options & Placement (if applicable)	5										
52	Test Pre-Wire	5	5									
53	Coordinate Cut	10										
54	Cut Circuit	2										
55	Post-Cut Circuit Test	2										
56	Update Dispatch System	2	3									
57	Total # of CO Minutes w/o Plug-In ==>	59										
58	Total # of CO Minutes w/ Plug-In ==>	64										

	A	B	C	D	E	F	G	H	I
1	**Florida**								
2	**Detailed Labor Worktimes**								
3	**Study Period: Study Period: 2000-2002**								
4	Index								
5	**Item/Description**								
6	**SPECIAL SERVICES INSTALLATION & MAINTENANCE (SSI&M) WORK ACTIVITIES**	**Source**	**Description**	**SSIM JG /WS**	**First Install**		**Addtl Install**		**Probability of Dispatch**
7	Dispatched to crossbox	Network	TRAVEL	411X	20.00		0.00		100%

	A	B	C
1	**Florida**		
2	**Miscellaneous Inputs**		
3	**Study Period: Study Period: 2000-2002**		
4	Index		
5			
6	**Input Description**	**Source**	**Amount**
7			
9			
10	% UDLC/NGDLC (of DLC Systems)	Network	35.62%
11			
12	% IDLC (of DLC Systems)	Network	64.38%
13			
14	% RMA for AFIG-Combined	FL-2w.xls, Inputs-Engineering, Line I12	30.00%
15			
16	% RMA for AFIG-No Outside Dispatch	Network	10.00%
17			
18	% RMA for AFIG-100% Dispatch	See Note 1	66.48%
19			
20	**% RMA for SAC - Combined**	**FL-2w.xls, Inputs-Engineering, Line I7**	10.00%
21			
22	% RMA for SAC - 100% Dispatch	**See Note 2**	28.24%
23			
24	% Copper	1-C8	45.00%
25			
26	**% Copper and UDLC**	**C24 + (C8 * C10)**	64.59%
27			
28	% IDLC	1 - C26	35.41%
29			
30	**Note 1 (formula):**	**Note 2 (formula):**	
31	(.1 * .6459) + (x * .3541) = .30 (combined)	(0 * .6459) + (x * .3541) = .10 (combined)	
32	.0646 + .3541x = .30	.3541x = .10	
33	.3541x = .30 - .0646	x = .10 / .3541	
34	.3541x = .2354	x = .2824	
35	x = .2354 / .3541		
36	x = .6648		