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ORIGINAL

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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

2001 JUL 17 P 3:37

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF INVESTIGATION)
INTO U S WEST COMMUNICATION,)
INC.'S COMPLIANCE WITH CERTAIN)
WHOLESALE PRICING REQUIREMENTS)
FOR UNBUNDLED NETWORK ELEMENTS)
AND RESALE DISCOUNTS.)

DOCKET NO: T-00000A-00-0194

NOTICE OF FILING STAFF'S
SURRBUTTAL TESTIMONY

Arizona Corporation Commission Staff ("Staff") hereby files the redacted surrbuttal testimony of William Dunkel in the above-referenced matter. Undredacted versions are being provided to Hearing Division and those parties who are signatories to the Protective Agreement herein.

RESPECTFULLY SUBMITTED this 17th day of July 2001.

Arizona Corporation Commission
DOCKETED
JUL 17 2001

DOCKETED BY

Maureen A. Scott, Attorney
Legal Division
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The ORIGINAL and ten (10) copies of the foregoing were filed this 17 day of July, 2001 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED
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1 COPIES of the foregoing were mailed
2 this 17th day of July, 2001 to:

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4 Arizonans for Competition in Telephone
5 Service
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7 Cave Creek, Arizona 85331-6561

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10 Mountain States, Inc.
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12 Denver, CO 80202-1847

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84 Santa Rosa, CA 95401

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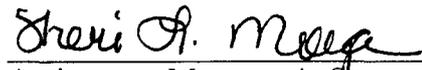
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Assistant to Maureen A. Scott

BEFORE THE ARIZONA CORPORATION COMMISSION

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INTO U S WEST COMMUNICATION,)
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RESPECTFULLY SUBMITTED this 17th day of July 2001.



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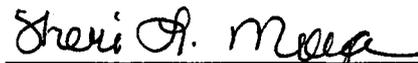
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DOCKET NO: T-00000A-00-0194

SURREBUTTAL TESTIMONY
OF
WILLIAM DUNKEL
ON BEHALF OF
THE STAFF OF THE ARIZONA CORPORATION COMMISSION

JULY 17, 2001

PUBLIC VERSION

**DUNKEL OUTLINE OF RESPONSE TO
QWEST'S REVISED RATES AND COST STUDIES**

I. In rebuttal, QWEST revised cost studies and rates. QWEST changed over 600 rates. (Arnold Rebuttal Exhibit MA-1R compared to prior Exhibit MA-1A)

- Rebuttal Schedule WD-18 is a summary of each of the QWEST revisions, and their impact on Staff's rate recommendations.

- Staff's resulting revised rates are attached hereto as Rebuttal Schedule WD-17.

II. Unbundled loop rates and other UNEs calculated using the HAI model

- Rebuttal Schedule WD-19 is a copy of Staff's revised HAI model run using the ACC and FCC inputs. The outputs of Rebuttal Schedule WD-19 were used in establishing the UNE loop rates and other rates that depend upon the HAI model in Rebuttal Schedule WD-17.

- Mr. Fitzsimmons, in his testimony and on his Exhibit WLF-3, alleges that the FCC inputs which I utilized were not the inputs that the FCC utilizes. The FCC inputs that I used are the FCC inputs exactly as used by the FCC in the actual run that the FCC used to determine universal service fund eligibility for Qwest in Arizona. That FCC run is available on the FCC website in the file "AZ Mountain Bell-Arizon_Default Scenario_WC.xls". Rebuttal Schedule WD-20 contains printouts from the FCC output file "AZ Mountain Bell-Arizon_Default Scenario_WC.xls", which shows the inputs used by the FCC in their High Cost Proxy Model. As can be seen by comparing the FCC inputs shown on Rebuttal Schedule WD-20 to the "Dunkel Scenario Values" shown on Exhibit WLF-3, the inputs which I used in my run of the HAI model were the same inputs that the FCC utilized in the model run they used for determining high cost support for Qwest in Arizona.

In addition, the comments on Exhibit WLF-3, which claim that "Dunkel does not include the FCC inputs" for various items, and that "Dunkel did not use any FCC values for placement costs", are also incorrect statements. Unless the ACC had established a value for the input, the input values I used for my HAI run were the same values that the FCC used, as can be seen by comparing the inputs in my HAI run to the above-referenced FCC file. I will have documents available during cross examination to demonstrate that my inputs and these FCC inputs are identical.

It appears that there are different FCC documents that have conflicting "FCC values" for certain inputs. To determine if there was any significant difference, I reran the HAI model using the "FCC scenario value" inputs shown on Exhibit WLF-3, which made a \$0.12 difference. Since this issue has little effect, and to

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avoid further controversy, my Rebuttal Schedule WD-19 utilizes what Qwest identifies as the "FCC scenario value inputs" as shown on Exhibit WLF-3.

- Fleming Rebuttal, pages 89-90 states AT&T used \$30 per line for "Analog Line Circuit Offset for DLC lines, per Line" and states that the ACC determined this figure should be \$0. The HAI run in my Direct testimony and on Rebuttal Schedule WD-19 does assign \$0 to this input.

- Buckley Rebuttal, page 10 discusses the drop length and costs used in the HAI model. My HAI run uses the drop length and costs as used by the FCC in their High Cost Proxy Model available on their website.

- Gude Rebuttal page 3, lines 10-13, changes from using "average" salvage values to using "net" salvage values. The HAI runs in my Direct testimony and on Rebuttal Schedule WD-19 use "net" salvage values as approved by the ACC in Decision No. 61945 dated September 17, 1999, and Decision No. 62507 dated May 4, 2000.

- Gude's Rebuttal page 38 states that the NID, SAI and drop depreciation life of 19 years should be adjusted based on the ACC approved "adjusted projection life" values of 11.21 for Buried cable, 9.45 for Aerial cable, and 14.15 for Underground cable. I have incorporated this suggested change on Rebuttal Schedule WD-19.

- On Rebuttal Schedule WD-19, I also used the current tax rate of 39.5292% (Page 3, Gude Rebuttal).

- Qwest uses the ICM to calculate their proposed UNE loop rates, and for other purposes. In addition to the changes in the cost of money, depreciation, and income tax factors, Qwest changed the TFI inputs, and the placement activity mix for DG5 and rural feeder. These changes do not solve the major problems with the ICM. The density group that Qwest changed (DG5) has only a ** ** weighting in the ICM run that Qwest used.¹ Even with the revision in DG5, the Qwest model still assumes that ** ** of the distribution cable would be placed using the expensive methods of "boring", "cutting and restoring concrete", and "cutting and restoring asphalt." If "cutting and restoring sod" is also included, as Mr. Buckley did in his Rebuttal, the overall percent becomes ** **, as shown on Rebuttal Schedule WD-21.

- The key problems with Qwest's ICM remain. For example, the model is still based upon the concept of placing the streets, sidewalks, driveways, lawns, and bushes in a residential subdivision, and then later, at a high expense, installing the copper pair distribution pairs after all of those surface obstructions are placed. The way that Qwest and the rest of the industry actually install the copper distribution cables in a residential subdivision is to install them before the surface

¹ Qwest response to Request WDA 14-238.

PUBLIC

obstructions are in place, usually in a trench paid for by the subdivision developer. The companies put in an ample number of distribution pairs so it is generally not necessary to come back in the future, even if customers order additional lines. The installation that Qwest relies on, the trial in Omaha, Nebraska, was not installing copper distribution pairs, but instead was installing fiber and coaxial distribution cables. The copper twisted pair cables were already there, and there was no reason to dig around the obstructions in order to install copper twisted pair.² The ICM and Hatfield models both use copper twisted pair cable as the residential subdivision distribution cable technology.

III. Collocation – Including Collocation, Line Sharing, and CLEC-to-CLEC

- Qwest made some changes to these cost studies, as summarized on Rebuttal Schedule WD-18, but for most of the collocation/line sharing/CLEC-to-CLEC rates, the revised Qwest rates are within a few percent of the prior Qwest rates.

- The Qwest changes do not cure the major problems with the Qwest collocation based studies. Those studies are based upon 50% of the labor being provided by outside vendors, and 50% being done by Qwest affiliated installers.³ For “power” labor inputs, these Company studies assume 75% vendor labor, and 25% Qwest labor.⁴ The outside vendor labor is significantly more expensive than is the Qwest affiliated installer labor. This labor mix is inaccurate. In the year 2000, ** ** of the collocation installations were done by Qwest labor, and only ** ** were done by outside vendors.⁵ So far in 2001, 17.2% of the collocation jobs have been done by outside vendors, and 82.8% done by Qwest labor.⁶

- Similar problems exist with the engineering and material costs used in the Qwest Collocation model. ** ** of the engineering cost for the 41 jobs that Qwest used to determine the engineering cost for collocation was the engineering cost of outside vendors, as shown on Rebuttal Schedule WD-22.⁷ However, the vast majority of the collocation jobs are actually done by Qwest personnel with Qwest engineering, and therefore the engineering cost calculations are not representative. In addition some of the materials used in the collocation jobs that are the basis of the Qwest study are materials provided by the outside construction contractors. Qwest can buy materials at prices that reflect high volume purchasing.

- In my revised rates shown on Rebuttal Schedule WD-17, I have utilized 20% vendor installations, and 80% Qwest installations.

² Qwest response to Request STF 15-245.

³ Fleming Rebuttal, page 58.

⁴ Qwest response to Request STF 13-228.

⁵ Qwest's response to Request ATT 08-192, Confidential Attachment A.

⁶ Qwest's response to Request ATT 08-192.

⁷ “Engineering” tab of Qwest “Cageless Collocation Jobs” model provided in response to Request STF 13-231.

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•In their Rebuttal cost studies, after calculating the direct costs, Qwest applies a number of overhead cost factors that result in increasing the direct cost by an average of an additional 32%, as can be calculated from Qwest's revised cost studies. In my calculations for the collocation items on Rebuttal Schedule WD-17, I have used the 15% markup over direct cost as ordered by the ACC in Decision No. 60635. Qwest contends that the Commission Order specified that the 15% was only for the "common" costs. Qwest contends the attributed costs (such as network operations) should be added in addition to the 15%. However, the ACC Decision clearly states:

Therefore, we will adopt an overhead cost factor, including attributed, joint and common costs, of 15 percent.⁸

•The impact of the different vendor weighting assumptions and the different overhead factors is shown on Rebuttal Schedule WD-23.

•On Fleming's Rebuttal Exhibit 5, in Columns D and E, Mr. Fleming performs a calculation that he claims reflects my recommendations. Mr. Fleming alleges I included "no Power, Land, Building, and IDC factors used. Finally, No HVAC nor Electric inputs." For Column E, Mr. Fleming states "Same as (3), but also does not include Aerial Support, Cable Racking, or Lighting." (See page 6 of Fleming Rebuttal Exhibit 5) Mr. Fleming misstates my testimony. I did not exclude these costs in my Direct, and I have not excluded these costs in the cost models and rates I recommend herein. I recommended a more reasonable calculation than the Company had used, as discussed in my Direct testimony, but I did not exclude these costs. These recovery of these costs are included in the rates which I proposed on Rebuttal Schedule WD-17.

⁸ Page 13, Decision No. 60635 in Docket No. U-3021-96-448 Et. al.

ACC STAFF REBUTTAL PRICING PROPOSAL

(1)

(2)

U-3021-96-448
U-3021-96-448- et. al.
Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC	
INTERCONNECTION					
Entrance Facilities					
DS1	\$89.42	\$256.87	\$52.89	\$134.07	*
DS3	\$357.16	\$256.87	\$279.64	\$134.07	*
Direct Trunked Transport					
DS0	\$5.05		**		
DS0 Over 0 to 8 Miles - Fixed			**		
DS0 Over 0 to 8 Miles - per mile			**		
DS0 Over 8 to 25 Miles - Fixed			**		
DS0 Over 8 to 25 Miles - per mile			**		
DS0 Over 25 to 50 Miles - Fixed			**		
DS0 Over 25 to 50 Miles - per mile			**		
DS0 Over 50 Miles - Fixed			**		
DS0 Over 50 Miles - per mile			**		
DS1 Over 0 to 8 Miles - Fixed	\$35.98		**		
DS1 Over 0 to 8 Miles - per mile	\$0.65		**		
DS1 Over 8 to 25 Miles - Fixed	\$35.99		**		
DS1 Over 8 to 25 Miles - per mile	\$0.94		**		
DS1 Over 25 to 50 Miles - Fixed	\$36.00		**		
DS1 Over 25 to 50 Miles - per mile	\$1.75		**		
DS1 Over 50 Miles - Fixed	\$36.00		**		
DS1 Over 50 Miles - per mile	\$1.59		**		
DS3 Over 0 to 8 Miles - Fixed	\$243.17		**		
DS3 Over 0 to 8 Miles - per mile	\$13.32		**		
DS3 Over 8 to 25 Miles - Fixed	\$246.15		**		
DS3 Over 8 to 25 Miles - per mile	\$15.90		**		
DS3 Over 25 to 50 Miles - Fixed	\$250.66		**		
DS3 Over 25 to 50 Miles - per mile	\$22.91		**		
DS3 Over 50 Miles - Fixed	\$249.26		**		
DS3 Over 50 Miles - per mile	\$22.49		**		
Multiplexing					
DS3 to DS1 per system	\$196.85	\$164.00	\$141.61	\$163.86	*
Local Traffic					
End office call termination, per minute of use			\$0.00149		
Tandem Switched Transport					
Tandem switching, per minute of use	\$0.0014		\$0.00057		
Tandem Transmission					
Over 0 to 8 Miles - Fixed, per mou			**		
Over 0 to 8 Miles - per mile			**		
Over 8 to 25 Miles - Fixed, per mou			**		
Over 8 to 25 Miles - per mile			**		
Over 25 to 50 Miles - Fixed, per mou			**		
Over 25 to 50 Miles - per mile			**		
Over 50 Miles - Fixed, per mou			**		
Over 50 Miles - per mile			**		

ACC STAFF REBUTTAL PRICING PROPOSAL

(1)

(2)

U-3021-96-448
U-3021-96-448- et. al.
Current Rates

ACC Staff
Pricing Proposal

		Recurring	NRC		Recurring	NRC	
Trunk Nonrecurring Charges							
DS1 Interface, First Trunk						\$216.68	*
DS1 Interface, Each Additional Trunk						\$3.62	*
DS1 Disconnect						**	
DS3 Interface, First Trunk						\$220.84	*
DS3 Interface, Each Additional Trunk						\$7.78	*
DS3 Disconnect						**	
DS1 Trunk Rearrangement							
First Trunk						**	
Each Additional Trunk						**	
DS3 Trunk Rearrangement							
First Trunk						**	
Each Additional Trunk						**	
Miscellaneous Charges							
Expedite Charge (LIS Trunks)					**	**	
Cancellation Charge (LIS Trunks)					**	**	
Construction Charges					**	**	
IntraLATA Toll Traffic							
					**	**	
Transit Traffic							
Exchange Service (EAS/Local) Transit					**	**	
Local Transit Assumed Mileage					**	**	
IntraLATA Toll					**	**	
IntraLATA Toll Assumed Mileage					**	**	
Jointly Provided Switched Access					**	**	
Category 11 Mechanized Record Charge, per Record					**	**	
Local Transit					**	**	
LIS EICT (when used for collocation)							
DS1		\$4.28	\$256.87		**	**	
DS3		\$14.98	\$269.78		**	**	
Interconnection Tie Pairs (ITP) (Optional)							
Per DS1					\$0.93		*
Per DS3					\$9.35		*
Channel Regeneration (Optional)							
DS1 Regeneration					\$1.20	\$293.12	*
DS3 Regeneration					\$3.71	\$1,108.91	*
COLLOCATION							
ALL COLLOCATION							
Quote Preparation Fee			\$1,381.54			**	
Augment QPF						**	
Collocation Entrance Facility, per fiber pair							
Standard per Fiber pair					\$9.77	\$383.07	*

ACC STAFF REBUTTAL PRICING PROPOSAL

(1)

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U-3021-96-448
U-3021-96-448- et. al.
Current Rates

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Pricing Proposal

	Recurring	NRC	Recurring	NRC	
Cross Connect per Fiber			\$9.86	\$448.59	*
Express per Cable			\$168.87	\$5,611.21	*
Element Group 1, per fiber pair	\$1.52	\$1,184.74	**	**	
Entrance Facility - Element Group 2					
Manhole, per Month, per Manhole	\$13.81		**		
Handhold, per Month, per Handhold	\$7.61		**		
Conduit/Innerduct POI to vault, per foot	\$0.21		**		
Core drill, per occurrence		\$181.57		**	
Riser, vault to equipment, per foot	\$0.24		**		
Fiber Optic cable, per 24, per foot	\$0.03		**		
Fiber placement in conduit & riser, per foot		\$0.83		**	
Copper 25 pair, per foot	\$0.006		**		
Copper placement conduit & reser, per foot		\$0.83		**	
Coax placement, per foot	\$0.10		**		
Cable Splicing					
Fiber - Per Set-Up		\$375.40		\$290.86	*
Per Fiber Spliced		\$15.79		\$23.25	*
Per Splice - Copper		\$45.64			
-48 Volt DC Power Usage, per Ampere, per Month					
Power Plant, per amp <60 amps	\$12.89		\$6.67		*
>60 amps			**		
=60 amps			**		
Power Usage Less Than 60 Amps, per Amp			\$2.26		*
Power Usage More Than 60 Amps, per Amp			\$4.52		*
AC Power Feed (Backup Power)					
AC Power Feed – per Amp, per Month					
120 V			\$11.61		*
208 V, Single Phase			\$20.12		*
208 V, Three Phase			\$34.81		*
240 V, Single Phase			\$23.22		*
240 V, Three Phase			\$40.16		*
480 V, Three Phase			\$80.32		*
-48 Volt DC Power Cable, per foot Per A & B Feeder					
20 Amp Feed	\$0.21	\$59.14	**	**	
40 Amp Feed	\$0.29	\$80.69	**	**	
60 Amp Feed	\$0.35	\$95.34	**	**	
100 Amp Feed			**	**	
200 Amp Feed			**	**	
300 Amp Feed			**	**	
400 Amp Feed			**	**	
AC Power Feed, per Watt, per Month					
	\$0.03		**		
AC Power Feed, per foot per A&B Feeder					
20 Amp, Single Phase			\$0.00714	\$4.89	*
20 Amp, Three Phase			\$0.00885	\$6.06	*
30 Amp, Single Phase			\$0.00769	\$5.27	*
30 Amp, Three Phase			\$0.01055	\$7.24	*
40 Amp, Single Phase			\$0.00909	\$6.20	*

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40 Amp, Three Phase			\$0.01244	\$8.53	*
50 Amp, Single Phase			\$0.01074	\$7.36	*
50 Amp, Three Phase			\$0.01501	\$10.27	*
60 Amp, Single Phase			\$0.01214	\$8.31	*
60 Amp, Three Phase			\$0.01726	\$11.82	*
100 Amp, Single Phase			\$0.01507	\$10.30	*
100 Amp, Three Phase			\$0.02349	\$16.08	*
Inspector Labor, per Half Hour					
Regular Hours Rate		\$24.49		**	
After Hours Rate, minimum 3 hours		\$36.24		**	
Interconnection Tie Pairs (ITP)					
Per DS1			\$0.93		*
Per DS3			\$9.35		*
EICT Channel Termination					
2 wire	\$0.44	\$383.30	**	**	
4 wire	\$0.86	\$383.30	**	**	
DS1 EICT	\$4.28	\$256.87	**	**	
DS3 EICT	\$14.98	\$269.78	**	**	
Channel Regeneration					
DS1 Regeneration	\$6.30		\$1.20	\$293.12	*
DS3 Regeneration	\$41.32		\$3.71	\$1,108.91	*
Collocation Terminations - DS0					
Block Termination			**	**	
Per Termination			**	**	
Cable Placement per 100 Pair Block, OR			\$0.29506	\$149.10	*
Cable Placement per Termination			\$0.00555	\$2.80	*
Cable per 100 Pair Block, OR			\$0.37954	\$191.78	*
Cable per Termination			\$0.00519	\$2.63	*
Blocks per 100 Pair Block, OR			\$0.66179	\$334.39	*
Blocks per Termination			\$0.00909	\$4.58	*
Block Placement Per 100 Pair Block, OR			\$0.30604	\$154.64	*
Block Placement per Termination			\$0.00421	\$2.12	*
Collocation Terminations - DS1					
Block Termination			**	**	
Per Termination			**	**	
Cable Placement per 28 DS1s, OR			\$0.36234	\$247.98	*
Cable Placement per Termination			\$0.03898	\$26.66	*
Cable per 28 DS1s, OR			\$0.32354	\$221.41	*
Cable per Termination			\$0.03477	\$23.81	*
Panel per 28 DS1s, OR			\$0.36917	\$252.64	*
Panel per Termination			\$0.04459	\$30.50	*
Panel Placement per 28 DS1s, OR			\$0.07735	\$52.91	*
Panel Placement per Termination			\$0.00830	\$5.69	*
Collocation Terminations - DS3					
Block Termination			**	**	
Per Termination			**	**	

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		Recurring	NRC	Recurring	NRC	
Cable Placement per Termination				\$0.14756	\$100.96	*
Cable per Termination				\$0.20893	\$142.97	*
Panel/Connector per Termination				\$0.21527	\$147.32	*
Panel/Connector Placement per Termination				\$0.02220	\$15.20	*
Security						
Per Employee, per Card				\$0.52		*
Card Access Per employee, per Office				\$4.82		*
Central Office Security Infrastructure				**	**	
Central Office Clock Synchronization						
Synchronization – Composite Clock, per Port				\$3.23		*
Space Availability Report						
Per Office					\$204.36	*
Space Reservation					**	
Space Option				**		
VIRTUAL						
Quote Preparation Fee			\$1,381.54		\$2,683.90	*
Inspector Labor, per Half Hour						
Regular Hours Rate			\$24.49		**	
After Hours Rate			\$36.24		**	
Maintenance Labor, per Half Hour						
Regular Hours Rate			\$22.20		**	
After Hours Rate			\$31.57		**	
Training Labor, per Half Hour						
Regular Hours Rate			\$23.95		**	
Equipment Bay -recurring, per Shelf		\$6.41		\$2.20		*
Engineering Labor, per Half Hour						
Regular Hours Rate			\$24.55		**	
After Hours Rate			\$35.25		**	
Installation Labor, per Half Hour						
Regular Hours Rate			\$23.73		**	
After Hours Rate			\$33.20		**	
Floor Space Lease, per Square Foot				\$2.25		*
Zone 1						
Zone 2						
Zone 3						
48 Volt DC Power Cables						
20A Power Feed, per feed				\$4.95	\$3,387.12	*

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	Recurring	NRC	Recurring	NRC	
30A Power Feed, per feed			\$5.65	\$3,869.82	*
40A Power Feed, per feed			\$6.90	\$4,721.28	*
60A Power Feed, per feed			\$8.61	\$5,890.14	*
CAGELESS COLLOCATION					
Quote Preparation Fee				\$2,683.90	*
Space Construction					
5 year payments (recurring for 5 yrs)			**		
on-going maintenance			**		
Space Construction (Standard 40 Amp Power Feed)					
2 Bays and 1 - 40A Power Feed			\$26.70	\$18,271.67	*
Adjustment for 20A Initial Power Feed			(\$1.95)	(\$1,334.16)	*
Adjustment for 30A Initial Power Feed			(\$1.24)	(\$851.46)	*
Adjustment for 40A Initial Power Feed			\$0.00	\$0.00	*
Adjustment for 60A Initial Power Feed			\$1.71	\$1,168.86	*
Adjustment for Each Additional Bay			\$2.71	\$1,853.22	*
Each Additional 20A Power Feed			\$4.95	\$3,387.12	*
Each Additional 30A Power Feed			\$5.65	\$3,869.82	*
Each Additional 40A Power Feed			\$6.90	\$4,721.28	*
Each Additional 60A Power Feed			\$8.61	\$5,890.14	*
Floor Space Lease, per Square Foot			\$2.25		*
Zone 1					
Zone 2					
Zone 3					
CAGED COLLOCATION					
Quote Preparation Fee				\$2,918.18	*
Space Construction (Standard 60 Amp Power Feed)					
Site Preparation					
Cage- Up to 100 Sq. Ft 5 yr payments maintenance			\$46.26	\$31,659.71	*
Cage- 101- 200 Sq. Ft 5 yr payments maintenance			\$48.01	\$32,853.59	*
Cage- 201- 300 Sq. Ft 5 yr payments maintenance			\$49.36	\$33,781.97	*
Cage- 301- 400 Sq. Ft 5 yr payments maintenance			\$51.06	\$34,945.41	*
Adjustment for 20A Initial Power Feed			(\$7.56)	(\$5,173.67)	*
Adjustment for 30A Initial Power Feed			(\$6.88)	(\$4,710.18)	*
Adjustment for 40A Initial Power Feed			(\$5.47)	(\$3,741.19)	*
Adjustment for 100A Initial Power Feed			\$8.37	\$5,727.34	*
Adjustment for 200A Initial Power Feed			\$26.72	\$18,284.45	*
Adjustment for 300A Initial Power Feed			\$49.02	\$33,547.50	*
Adjustment for 400A Initial Power Feed			\$75.40	\$51,598.63	*
Each Additional 20A Power Feed			\$6.25	\$4,272.66	*
Each Additional 30A Power Feed			\$6.92	\$4,736.15	*
Each Additional 40A Power Feed			\$8.34	\$5,705.13	*
Each Additional 60A Power Feed			\$13.80	\$9,446.33	*
Each Additional 100A Power Feed			\$22.17	\$15,173.67	*

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	Recurring	NRC	Recurring	NRC	
Each Additional 200A Power Feed			\$40.52	\$27,730.78	*
Each Additional 300A Power Feed			\$62.82	\$42,993.82	*
Each Additional 400A Power Feed			\$89.20	\$61,044.96	*
20A Power Feed			**	**	
30A Power Feed			**	**	
40A Power Feed			**	**	
60A Power Feed			**	**	
100A Power Feed			**	**	
200A Power Feed			**	**	
300A Power Feed			**	**	
400A Power Feed			**	**	
Engineering			**	**	
Augment Engineering			**	**	
Floor Space Lease, per Square Foot			\$2.25		*
Rent w/maintenance per foot zone 1					
Rent w/maintenance per foot zone 2					
Rent w/maintenance per foot zone 3					
Grounding					
2/0 AWG - per Foot			\$0.01129	\$7.72	*
1/0 AWG - per Foot			\$0.01879	\$12.84	*
4/0 AWG - per Foot			\$0.02129	\$14.59	*
350 kcmil - per Foot			\$0.02959	\$20.24	*
500 kcmil - per Foot			\$0.03294	\$22.55	*
750 kcmil - per Foot			\$0.05051	\$34.56	*
Humidification per Leased Physical Space	\$28.03		**		
ICDF Collocation			**	**	
Adjacent Collocation			**	**	
REMOTE COLLOCATION & REMOTE ADJ. COLLOCATION			**	**	
CLEC-to-CLEC Connections					
CLEC to CLEC Quote Preparation Fee					
Design Engineering & Installation - No Cables				\$482.89	*
Cable Racking (Per Foot)					
DS0			\$0.10529		*
DS1			\$0.11157		*
DS3			\$0.09703		*
Virtual Connections (Connections only; No Cables)					
DS0 (Per 100 Connections)				\$136.65	*
DS1 (Per 28 Connections)				\$62.32	*
DS3 (Per 1 Connection)				\$5.39	*
Cable Hole (if Applicable)				\$269.92	*
CLEC to CLEC Cross-Connection				\$156.39	*

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	Recurring	NRC	Recurring	NRC
UNBUNDLED NETWORK ELEMENTS (UNES)				
Interconnection Tie Pairs (ITP)-Per Termination				
DS0 2-wire			\$0.29	*
DS0 4-wire			\$0.29	*
DS1 Per each Termination			\$0.93	*
DS3 Per each Termination			\$9.35	*
Unbundled Loops				
2 Wire Voice Grade	\$21.98		\$12.35	
Zone 1	\$18.96		\$9.93	
Zone 2	\$34.94		\$14.60	
Zone 3	\$56.53		\$35.41	
4 Wire Voice Grade	\$22.90		\$24.07	
Zone 1			\$19.25	
Zone 2			\$28.55	
Zone 3			\$70.13	
Non-loaded Loops				
2 Wire Non-loaded Loop				
Zone 1			\$9.93	
Zone 2			\$14.60	
Zone 3			\$35.41	
4 Wire Non-loaded Loop				
Zone 1			\$19.25	
Zone 2			\$28.55	
Zone 3			\$70.13	
Cable Unloading/Bridge Tap Removal		\$114.80		
Under 18,000 feet, per loop				\$40.00
Above 18,000 feet, per location (for aerial and buried)				\$70.00
Above 18,000 feet, per location (for underground)				\$400.00
Above 18,000 feet, each additional coil or tap at the same time & location & cable				\$2.00
Basic Rate ISDN /XDSL/ADSL Capable Loops				
Zone 1			\$9.93	
Zone 2			\$14.60	
Zone 3			\$35.41	
DS1 Capable Loop			**	
Zone 1			**	
Zone 2			**	
Zone 3			**	
HDSL 4 Wire (DS1) - Equipped Loop			**	
DS3 Capable Loop			**	

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	Recurring	NRC	Recurring	NRC
Zone 1			**	
Zone 2			**	
Zone 3			**	
2 Wire Extension Technology	\$6.75		\$2.52	*
DS0 - Loop Installation Charges				
Basic Installation				
Residence 2-wire		\$40.92		**
Business - 2 wire		\$45.92		**
POTS/ISDN BRI Migration (UNE Loop)				**
POTS/ISDN BRI Installation (UNE Loop)				**
POTS/ISDN BRI Disconnect (UNE Loop)				**
Residence 4-wire		\$41.82		**
Business 4-wire		\$46.92		**
4 Wire Migration (UNE Loop)				**
4 Wire Install (UNE Loop)				**
4 Wire Disconnect (UNE Loop)				**
Each Additional Loop				**
Basic Installation with Performance Testing				
First Loop				\$117.30 *
Each Additional Loop				\$84.16 *
Coordinated Installation with Cooperative Testing				
First Loop				\$141.67 *
Each Additional Loop				\$84.16 *
Coordinated Installation without Cooperative Testing				
First Loop				\$58.18 *
Each Additional Analog Loop				\$50.73 *
Coordinated Installation with Cooperative Testing - No Dispatch				
First Loop				**
Each Additional Loop				**
Basic Installation with Cooperative Testing				
First Loop				\$117.30 *
Each Additional Loop				\$84.16 *
DS1 Loop Installation Charges				
Basic Installation				
First Loop				\$87.93 *
Each Additional Loop				\$67.58 *
Migration				**
Disconnect				**
Basic Installation with Performance Testing				
First Loop				\$169.69 *

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		Recurring	NRC		Recurring	NRC
Each Additional Loop					\$124.27	*
Coordinated Installation with Cooperative Testing						
First Loop					\$194.07	*
Each Additional Analog Loop					\$124.27	*
Coordinated Installation without Cooperative Testing						
First Loop					\$93.49	*
Each Additional Loop					\$73.14	*
Basic Installation with Cooperative Testing						
First Loop					\$169.69	*
Each Additional Loop					\$124.27	*
DS3 Loop Installation Charges						
Basic Installation						
First Loop					\$87.93	*
Each Additional Loop					\$67.58	*
Migration					**	
Disconnect					**	
Basic Installation with Performance Testing or w/cooperative testing						
First Loop					\$169.69	*
Each Additional Loop					\$124.27	*
Coordinated Installation with Cooperative Testing						
First Loop					\$194.07	*
Each Additional Analog Loop					\$124.27	*
Coordinated Installation without Cooperative Testing						
First Loop					\$93.49	*
Each Additional Loop					\$73.14	*
Basic Installation with Cooperative Testing						
First Loop					\$169.69	*
Each Additional Loop					\$124.27	*
Subloop						
2-Wire Non Loaded Distribution Loop						
2-Wire Analog Distribution Loop		\$15.33	BFR			**
Zone 1					\$5.24	
Zone 2					\$9.37	
Zone 3					\$25.79	
Each Additional						**
2 Wire Migration at the FDI						**
2 Wire Disconnect at the FDI						**
4-Wire Non Loaded Distribution Loop						
4-Wire Analog Distribution Loop						
Zone 1					\$10.48	
Zone 2					\$18.74	

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	Recurring	NRC	Recurring	NRC
Zone 3			\$51.59	**
4 Wire Migration at the FDI				**
4-Wire Disconnect at the FDI				**
2-Wire Loop Feeder				
Zone 1			\$1.04	
Zone 2			\$1.41	
Zone 3			\$3.86	
4-Wire Loop Feeder				
Zone 1			\$2.08	
Zone 2			\$2.82	
Zone 3			\$7.73	
2-Wire Loop Concentration				
Zone 1			\$3.04	
Zone 2			\$3.17	
Zone 3			\$5.06	
4-Wire Loop Concentration				
Zone 1			\$6.07	
Zone 2			\$6.35	
Zone 3			\$10.13	
Building Cable				
Intrabuilding Cable Loop, Per Pair			\$0.73	
On Premises Wire				**
DS1 Capable Feeder Loop				**
DS1 Each Additional Capable Feeder Loop				**
Zone 1			**	
Zone 2			**	
Zone 3			**	
Channelized DS1 Virtual Feeder to RT Install				**
Channelized DS1 Virtual Feeder to RT Disconnect				**
OSS			**	**
Trouble Isolation Charge				**
FDI Field Connection Point				**
Field Connection Point				
Feasibility Fee/Quote Preparation Fee				**
Construction Fee				**
Line Sharing				
Shared Loop, per Loop			\$2.47	**
OSS - Per Line - Per Month			\$0.10	
OSS, per Order				**
Reclassification Charge				**
Splitter Shelf Charge			**	**
Splitter TIE Cable Connections				
Option 1A			**	**
Option 1B			**	**
Option 2A			**	**

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	Recurring	NRC	Recurring	NRC	
Option 2B			**	**	
Option 3A			**	**	
Option 3B			**	**	
POTS Splitter Options					
Splitter in the Common Area					
Data to 410 Block			\$3.55	\$1,945.81	*
Data Direct to CLEC			\$3.73	\$2,042.15	*
Splitter on the IDF					
Data to 410 Block			\$1.13	\$619.31	*
Data Direct to CLEC			\$2.12	\$1,159.55	*
Splitter on the MDF					
Data to 410 Block			\$1.17	\$637.07	*
Data Direct to CLEC			\$2.49	\$1,368.14	*
Additional Testing			**	**	
Splitter shelf charge			\$3.91	\$328.11	*
POTS Splitter Charge - Per Splitter			**	**	
Engineering					
New Bay				\$560.00	
Existing Bay				\$120.00	
Trouble Isolation Charge				**	
Network Interface Device (NID)	\$0.58	\$30.00	\$0.63	**	
Zone 1			\$0.62		
Zone 2			\$0.65		
Zone 3			\$0.68		
Unbundled Dedicated Interoffice Transport (UDIT)					
DS0 UDIT				**	
DS0 Over 0 to 8 Miles - Fixed	\$5.05		**		
DS0 Over 0 to 8 Miles - per mile	\$0.00		**		
DS0 Over 8 to 25 Miles - Fixed	\$5.05		**		
DS0 Over 8 to 25 Miles - per mile	\$0.00		**		
DS0 Over 25 to 50 Miles - Fixed	\$5.05		**		
DS0 Over 25 to 50 Miles - per mile	\$0.00		**		
DS0 Over 50 Miles - Fixed	\$5.05		**		
DS0 Over 50 Miles - per mile	\$0.00		**		
DS1 UDIT				**	
DS1 Over 0 to 8 Miles - Fixed	\$35.98		**		
DS1 Over 0 to 8 Miles - per mile	\$0.65		**		
DS1 Over 8 to 25 Miles - Fixed	\$35.99		**		
DS1 Over 8 to 25 Miles - per mile	\$0.94		**		
DS1 Over 25 to 50 Miles - Fixed	\$36.00		**		
DS1 Over 25 to 50 Miles - per mile	\$1.75		**		
DS1 Over 50 Miles - Fixed	\$36.00		**		
DS1 Over 50 Miles - per mile	\$1.59		**		
DS1 Interoffice Transport - Disconnect				**	
DS3 UDIT				**	
DS3 Over 0 to 8 Miles - Fixed	\$243.17		**		
DS3 Over 0 to 8 Miles - per mile	\$13.32		**		

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	Recurring	NRC	Recurring	NRC
DS3 Over 8 to 25 Miles - Fixed	\$246.15		**	
DS3 Over 8 to 25 Miles - per mile	\$15.90		**	
DS3 Over 25 to 50 Miles - Fixed	\$250.66		**	
DS3 Over 25 to 50 Miles - per mile	\$22.91		**	
DS3 Over 50 Miles - Fixed	\$249.26		**	
DS3 Over 50 Miles - per mile	\$22.49		**	
DS3 Interoffice Transport - Disconnect				**
OC3 UDIT				**
OC-3 Over 0 to 8 Miles - Fixed			**	
OC-3 Over 0 to 8 Miles - per mile			**	
OC-3 Over 8 to 25 Miles - Fixed			**	
OC-3 Over 8 to 25 Miles - per mile			**	
OC-3 Over 25 to 50 Miles - Fixed			**	
OC-3 Over 25 to 50 Miles - per mile			**	
OC-3 Over 50 Miles - Fixed			**	
OC-3 Over 50 Miles - per mile			**	
OC-12 UDIT				**
OC-12 Over 0 to 8 Miles - Fixed			**	
OC-12 Over 0 to 8 Miles - per mile			**	
OC-12 Over 8 to 25 Miles - Fixed			**	
OC-12 Over 8 to 25 Miles - per mile			**	
OC-12 Over 25 to 50 Miles - Fixed			**	
OC-12 Over 25 to 50 Miles - per mile			**	
OC-12 Over 50 Miles - Fixed			**	
OC-12 Over 50 Miles - per mile			**	
Above OC-12 UDIT			**	**
Common Transport per minute per leg	\$0.00088		**	
Extended Unbundled Dedicated Interoffice Transport				
DS1 E-UDIT			**	**
DS3 E-UDIT			**	**
OC-3 E-UDIT			**	**
OC-12 E-UDIT			**	**
Above OC-12 E-UDIT			**	**
DS0 UDIT Low Side Channelization			**	
Low Side Channel Performance			**	
Low Side Channel Performance with Multiplexing			**	
DS1/DS0 Low Side Channelization			**	**
Multiplexing DS3 to DS1	\$196.85	\$164.00	\$141.61	*
Multiplexing DS1 to DS0	\$200.08		\$128.51	*
UDIT M1-3 Multiplexing				**
UDIT MI-O Multiplexing High Side				**
UDIT M1-0 Multiplexing Low Side			**	**
UDIT Rearrangement				
Single Office				**
Dual Office				**

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	Recurring	NRC	Recurring	NRC
High Capacity Single Office				**
High Capacity Dual Office				**
Unbundled Dark Fiber (UDF)				
Single Strand Increments (Available May 31, 2001)			**	**
Initial Records Inquiry (IRI)				**
Simple				**
Complex				**
Mid-Point Structure Inquiry (MPSI)				**
Field Verification and Quote Preparation (FVQP)				**
Field Verification				**
UDF-IOF Charges				**
Order Charge per PR/Route/Order				**
Order Charge ea Addl. Pr/Same Route				**
Termination, Fixed per Pr./Office			**	
Termination-Wire Center-2 Per Pair			**	
Fiber Transport, per Mile			**	
Fiber Cross-Connect Per Pr.			**	**
Fiber Disconnect				**
UDF-Loop Charges				**
Order Charge per Pr./Route/Order				**
Order Charge ea Addl. Pr/Same Route				**
Termination, Fixed Per Pr./Office			**	
Termination Fixed Per Pr./Prem.			**	
Fiber Transport, per Route/Per Pr.			**	
UDF Loop - Per Fiber Loop			**	
Fiber Cross-Connect Per Pr.			**	**
Fiber Disconnect				**
Extended Unbundled Dark Fiber (E-UDF)				**
Order Charge per Pr./Route/Order				**
Order Charge ea Addl. Pr.Same Route				**
Termination, Fixed Per Pr./Office			**	
Termination at Wire Center, 2 per Pair			**	
Termination Fixed Per Pr./Prem.			**	
Fiber Transport, per Route/Per Pr.			**	
E-UDF Fiber (Per pair)			**	**
Fiber Cross-Connect Per Pr.			**	**
Shared Transport				
Per Minute of Use - TELRIC Based Rate			**	
Unbundled Customer Controlled Rearrangement Element (UCCRE)				
DS1 Port			**	**
DS3 Port			**	**
Dial Up Access			**	**
Attendant Access			**	**
Virtual Ports			**	**
Local Tandem Switching				

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
DS1 Local Message Trunk Port			**	**
DS1 Local Message Trunk Port - Disconnect				**
Trunk Group - First Trunk				**
Message Trunk Group - Each Additional Trunk				**
DS1 Trunk Group-Each Additional Trunk-Per Order				**
Per minute of use	\$0.0014		\$0.00057	
Local Switching				
Local Switching - TELRIC Based Rates				
Analog Line Side Port, First Port	\$1.61	\$42.58	\$1.12	**
Analog Line Side Port, Each Additional			**	**
Analog Line Side Port, Disconnect				**
Local Usage, per Minute of Use	\$0.0028		\$0.00149	
Line Port (DS0, Analog, ISLU) Disconnect			**	**
10XXX Direct Dialed Blocking			**	**
Account Codes - per system			**	**
Attendant Access Line - per station line			**	**
Audible Message Waiting			**	**
Authorization Codes - per system			**	**
Auto Call Back			**	**
Automatic Line			**	**
Automatic route selection - Common Equip per sys			**	**
Blocking of pay per call services			**	**
Bridging			**	**
Call Drop			**	**
Call Exclusion - Automatic			**	**
Call Exclusion - Manual			**	**
Call Forward Don't Answer - All Calls			**	**
Call Forwarding Incoming Only			**	**
Call Forwarding Intra Group Only			**	**
Call Forwarding Variable Remote			**	**
Call Forwarding Busy Line			**	**
Call Forwarding : Busy Line (Expanded)			**	**
Call Forwarding : Busy Line (External)			**	**
Call Forwarding : Busy Line (External) Don't Answer			**	**
Call Forwarding : Busy Line (Overflow)			**	**
Call Forwarding : Busy Line (Overflow) Don't Answer			**	**
Call Forwarding : Busy Line (Programmable)			**	**
CF Busy Line Don't Answer Programmable - Svc Establishment			**	**
CF Busy Line Don't Answer Programmable - per line			**	**
Call Forwarding : Busy Line Don't Answer (Expanded)			**	**
Call Forwarding : Don't Answer			**	**
Call Forwarding : Don't Answer (Expanded)			**	**
Call Forwarding : Don't Answer (Programable)			**	**
Call Forwarding: Variable			**	**
Call Forwarding: Variable no call complete option			**	**
Call Hold			**	**
Call Hold/3-Way/Call Transfer			**	**
Call Park (Basic - Store & Retrieve)			**	**
Call Pickup			**	**
Call Transfer			**	**

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
Call Waiting Dial Originating			**	**
Call Waiting Indication - per timing state			**	**
Call Waiting Originating			**	**
Call Waiting Terminating - All Calls			**	**
Call Waiting Terminating - Incoming Only			**	**
Call Waiting/Cancel Call Waiting			**	**
CENTREX Common Equipment			**	**
CENTREX Management System (CMS)			**	**
CENTREX Plus DID Numbers per number			**	**
CENTREX Plus to CENTREX Plus			**	**
CENTREX Plus to IC Carrier			**	**
CENTREX Plus to PBX/Key Blocked			**	**
CENTREX Plus to PBX/Key Non-Blocked			**	**
CFBL - All Calls			**	**
CBL - Incoming Only			**	**
CFDA Incoming Only			**	**
CLASS - Anonymous Call Rejection			**	**
CLASS - Call Waiting ID			**	**
CLASS - Calling Name & Number			**	**
CLASS - Calling Number Delivery			**	**
CLASS - Calling Number Delivery Blocking			**	**
CLASS - Continuous Redial			**	**
CLASS - Last Call Return			**	**
CLASS - Priority Calling			**	**
CLASS - Selective Call Forwarding			**	**
CLASS - Selective Call Rejection			**	**
Common Equipment per 1.544 mbps facility (DS1)			**	**
Conference Calling - Meet Me			**	**
Conference Calling - Preset			**	**
Custom Ringing First Line (Short/Long/Short)			**	**
Custom Ringing First Line (Short/Short)			**	**
Custom Ringing First Line (Short/Short/Long)			**	**
Custom Ringing Second Line (Short/Long/Short)			**	**
Custom Ringing Second Line (Short/Short)			**	**
Custom Ringing Second Line (Short/Short/Long)			**	**
Custom Ringing Third Line (Short/Long/Short)			**	**
Custom Ringing Third Line (Short/Short)			**	**
Custom Ringing Third Line (Short/Short/Long)			**	**
Data Call Protection (DMS 100)			**	**
Dir Sta Sel/Busy Lamp Fld per arrangement			**	**
Directed Call Pickup with Barge-in			**	**
Directed Call Pickup without Barge-in			**	**
Distinctive Ring/Distinctive Call Waiting			**	**
Distinctive Ringing			**	**
EBS - Set Interface - per station line			**	**
Executive Busy Override			**	**
Expensive Route Warning Tone - per system			**	**
Facility Restriction Level - per system			**	**
Feature Display			**	**
Group Intercom			**	**
Hot Line - per line			**	**
Hunting Multiposition Circular Hunting			**	**
Hunting Multiposition Hunt Queuing			**	**

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
Hunting Multiposition Series Hunting			**	**
Hunting Multiposition with Announcement in Queue			**	**
Hunting Multiposition with Music in Queue			**	**
Incoming Calls Barred			**	**
International direct Dial Blocking			**	**
ISDN Short Hunt			**	**
Line Side Answer Supervision			**	**
Loudspeaker Paging - per trunk group			**	**
Make Busy Arrangements - per group			**	**
Make Busy Arrangements - per line			**	**
Message Center - per main station line			**	**
Message Waiting Indication A/V			**	**
Message Waiting Visual			**	**
Music On Hold - per system			**	**
Network Speed Call			**	**
Night Service Arrangement			**	**
Outgoing Calls Barred			**	**
Outgoing Trunk Queuing			**	**
Privacy Release			**	**
Query Time			**	**
Speed Calling 1 Digit Controller			**	**
Speed Calling 1 Digit User			**	**
Speed Calling 1# List Individual			**	**
Speed Calling 2 Digit Controller			**	**
Speed Calling 2 Digit User			**	**
Speed Calling 2# List Individual			**	**
Speed Calling 30 Number			**	**
Speed Calling 8 Number			**	**
Speed Call Long-Customer Change			**	**
Station Camp-On Service - per main station			**	**
Station Dial Conferencing (6 way)			**	**
Station Message Detail Recording (SMDR)			**	**
Three Way Calling			**	**
Time and Date Display			**	**
Time of Day Control for ARS - per system			**	**
Time of Day NCOS Update			**	**
Time of Day Routing - per line			**	**
Toll Restriction Service			**	**
Trunk Answer Any Station			**	**
Trunk Verification from Designated Station			**	**
UCD in Hunt Group - per line			**	**
UCD with Music After Delay			**	**
CMS - System Establishment - Initial Installation			**	**
CMS - System Establishment - Subsequent Installation			**	**
CMS - Packet Control Capability, per System			**	**
SMDR-P - Service Establishment Charge, Initial Installation			**	**
SMDR-P Archived Data			**	**
Class - Call Trace (per occurrence)			**	**
Feature Changes				**
Subsequent Order Charge				**

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

		Recurring	NRC	Recurring	NRC
Digital Line Side Port (Supporting BRI ISDN) First Port and each additional port				**	**
DS0 Analog Trunk Port					
First Port	\$1.61		\$42.58	\$1.12	**
Each Additional					
Digital Trunk Ports					
DS1 Local Message Trunk Port				**	**
DS1 Local Message Trunk Port - Disconnect					**
Message Trunk Group, First Trunk					**
Message Trunk Group, Each Additional					**
DS1 PRI ISDN Trunk Port				**	**
DS1 DID Trunk Port				**	**
Local Switching - Market Based Rates					
Analog Line Side Port, First Port				**	**
Each Additional Port (ordered concurrently with an unbundled loop)				**	**
Vertical Features				**	**
Call Hold				**	**
Call Transfer				**	**
Three Way Calling				**	**
Call Pickup				**	**
Call Waiting/Cancel Call Waiting				**	**
Distinctive Ringing				**	**
Speed Call Long - Customer Change				**	**
Station Dial Conferencing (6-way)				**	**
Call Forwarding Busy Line				**	**
Call Forwarding Don't Answer				**	**
Call Forwarding Variable				**	**
Call Forwarding Variable Remote				**	**
CLASS - Call Waiting ID				**	**
CLASS - Calling Name & Number				**	**
CLASS - Calling Number Delivery				**	**
CLASS - Calling Number Delivery Blocking				**	**
CLASS - Continuous Redial				**	**
CLASS - Last Call Return				**	**

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
CLASS - Priority Calling			**	**
CLASS - Selective Call Forwarding			**	**
CLASS - Selective Call Rejection			**	**
CLASS - Anonymous Call Rejection			**	**
Call Park (Store & Retrieve)			**	**
Message Waiting Indication A/V			**	**
Subsequent Order Charge				**
Digital Line Side Port (Supporting BRI ISDN)			**	
First Port				**
Each Additional Port				**
Digital Trunk Ports				
DS1 Local Message Trunk Port				**
DS1 Digital Trunk, Install				**
DS1 Digital Trunk, Disconnect				**
Message Trunk Group, First Trunk				**
Message Trunk Group, Each Additional				**
DS1 PRI ISDN Trunk Port				**
Customized Routing				
Development of Custom Line Class Code-DA or OS Routing Only				**
Installation Charge, per Switch-DA or OS Routing Only				**
All Other Custom Routing			**	**
Common Channel Signaling/SS7				
Entrance Facility DS1, Electrical	\$89.42	\$560.88	**	**
Subsequent		\$560.88		**
Entrance Facility DS3, Electrical	\$357.16		**	
Direct Link Transport				
DS1 - over 0 to 8	\$35.98	\$0.65	**	**
DS1 - over 8 to 25	\$35.99	\$0.94	**	**
DS1 - over 25 to 50	\$36.00	\$1.75	**	**
DS1 - over 50	\$36.00	\$1.59	**	**
DS3 - over 0 to 8	\$243.17	\$13.32	**	**
DS3 - over 8 to 25	\$246.15	\$15.90	**	**
DS3 - over 25 to 50	\$250.66	\$22.91	**	**
DS3 - over 50	\$249.26	\$22.49	**	**
Multiplexing				

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
DS1 to DS0	\$200.08		**	
DS3 to DS1	\$196.85		**	
CCSAC STP Port			**	**
CCSAC Options Activation Charge				
Basic Translations				
First Activation, per order				**
Each Additional Activation, per				**
CCSAC Options Database Translations				
First Activation per order				**
Each additional Activation per order				**
Signal Formulation, ISUP, Per Call Set-Up Request			**	
Signal Transport, ISUP, Per Call Set-Up Request			**	
Signal Transport, TCAP, per Data Request			**	
Signal Switching, ISUP, Per Call Set-Up Request			**	
Signal Switching, TCAP, Per Data Request			**	
STP per message	\$0.00005		\$0.00006	
SCP per message	\$0.00100		\$0.00109	
CCS Link - First Link		\$464.94		**
CCS Link - Each Additional Link		\$147.60		**
Signaling Link				
First Link, DSO	\$24.85		\$38.28	**
Additional Link, DSO	\$24.85		**	
SS7 Links (DS0) Disconnect				**
SS7 Links (DS1) Install				**
SS7 Links (DS1) Disconnect				**
SS7 STP global title translations 'A Link' only Install				**
SS7 STP global title translations 'A Link' only Disconnect				**
SS7 STP message transfer part 'A Link' only (port) Install				**
SS7 STP message transfer part 'A Link' only (port) Disconnect				**
Advanced Intelligent Network (AIN)				
AIN Customized Services (ACS)				**
AIN Platform Access (APA)			**	**
AIN Query Processing, per Query			**	
Line Information Database (LIDB)				
LIDB Storage				**
Line Validation Administration System Access (LVAS)				**
LIDB Line Record Initial Load				
Up to 20,000 Line Records				**
Over 20,000 Line Records				**
Mechanized Service Account Update, per Addition or Update Processed				**
Individual Line Record Audit				**
Account Group Audit				**
Expedited Request Charge for Manual Updates				**
LIDB Query Service, per Query			**	**
Fraud Alert Notification, per Alert			**	
8XX Database Query Service				

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
Basic Query, per Query			**	**
POTS Translation			**	
Call Handling & Destination Feature			**	
ICNAM, Per Query			**	**
Construction Charges			**	**
Miscellaneous Elements				
Additional Engineering – Basic				**
Additional Engineering – Overtime				**
Additional Labor Installation – Overtime				**
Additional Labor Installation – Premium				**
Additional Labor Other – Basic				**
Additional Labor Other – Overtime				**
Additional Labor Other – Premium				**
Testing and Maintenance – Basic				**
Testing and Maintenance – Overtime				**
Testing and Maintenance – Premium				**
Maintenance of Service – Basic				**
Maintenance of Service – Overtime				**
Maintenance of Service – Premium				**
Additional COOP Acceptance Testing – Basic				**
Additional COOP Acceptance Testing – Overtime				**
Additional COOP Acceptance Testing – Premium				**
NonScheduled COOP Testing - Basic				**
NonScheduled COOP Testing – Overtime				**
NonScheduled COOP Testing – Premium				**
NonScheduled Manual Testing – Basic				**
NonScheduled Manual Testing – Overtime				**
NonScheduled Manual Testing – Premium				**
Cooperative Scheduled Testing – Loss				**
Cooperative Scheduled Testing – C-Message Noise				**
Cooperative Scheduled Testing – Balance				**
Cooperative Scheduled Testing – Gain Slope				**
Cooperative Scheduled Testing – C-Notched Noise				**
Manual Scheduled Testing – Loss				**
Manual Scheduled Testing – C-Message Noise				**
Manual Scheduled Testing – Balance				**
Manual Scheduled Testing – Gain Slope				**
Manual Scheduled Testing – C-Notched Noise				**
Additional Dispatch				**
Date Change				**
Design Change				**
Expedite Charge				**
Cancellation Charge				**
Channel Regeneration				
DS1 Regeneration			\$1.20	\$293.12 *
DS3 Regeneration			\$3.71	\$1,108.91 *
UNE Platform				
UNE-P Platform Pots New/Existing				

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
New				**
Mechanized, First				**
Mechanized, Each Additional				**
Manual, First				**
Manual, Each Additional				**
Existing				**
Mechanized, First				**
Mechanized, Each Additional				**
Manual, First				**
Manual, Each Additional				**
UNE-P New Connection				**
UNE-P POTS Mechanized, First				**
UNE-P POTS Mechanized, Each Additional				**
UNE-P POTS Manual, First				**
UNE-P POTS Manual, Each Additional				**
UNE-P Conversion				**
UNE-P POTS,CENTREX, PAL, PBX				**
Mechanized, First				**
Mechanized, Each Additional				**
Migration				**
Disconnect				**
UNE-P POTS,CENTREX, PAL, PBX				**
Manual,First				**
Manual, Each Additional				**
UNE-P PBX DID				**
First				**
Each Additional				**
UNE-P ISDN BRI				**
First				**
Each Additional				**
Migration				**
Disconnect				**
UNE-P ISDN PRI, DSS per DS1 Facility				**
UNE-P ISDN PRI, DSS Trunk				**
First				**
Each Additional				**
UNE-Combination Private Line				**
DS0/DS1/DS3/OCN/Integrated T-1 Existing Service				**
Enhanced Extended Loop (EEL)				

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
EEL Link				**
DS0 2-Wire				**
DS0, Each Additional				**
Zone 1			\$9.93	
Zone 2			\$14.60	
Zone 3			\$35.41	
DS0 4-Wire				**
Each Additional				**
Zone 1			\$19.25	
Zone 2			\$28.55	
Zone 3			\$70.13	
DS1			**	**
Zone 1			**	
Zone 2			**	
Zone 3			**	
Each Additional				**
DS3			**	**
Zone 1			**	
Zone 2			**	
Zone 3			**	
Each Additional				**
EEL C				**
EEL Transport				
DS0 EEL Transport				**
DS0 Over 0 to 8 Miles - Fixed			**	
DS0 Over 0 to 8 Miles - per mile			**	
DS0 Over 8 to 25 Miles - Fixed			**	
DS0 Over 8 to 25 Miles - per mile			**	
DS0 Over 25 to 50 Miles - Fixed			**	
DS0 Over 25 to 50 Miles - per mile			**	
DS0 Over 50 Miles - Fixed			**	
DS0 Over 50 Miles - per mile			**	
Migration				**
Disconnect				**
DS1 EEL Transport				**
DS1 Over 0 to 8 Miles - Fixed			**	
DS1 Over 0 to 8 Miles - per mile			**	
DS1 Over 8 to 25 Miles - Fixed			**	
DS1 Over 8 to 25 Miles - per mile			**	
DS1 Over 25 to 50 Miles - Fixed			**	
DS1 Over 25 to 50 Miles - per mile			**	
DS1 Over 50 Miles - Fixed			**	
DS1 Over 50 Miles - per mile			**	
Migration				**
Disconnect				**
DS3 EEL Transport				
DS3 Over 0 to 8 Miles - Fixed			**	
DS3 Over 0 to 8 Miles - per mile			**	
DS3 Over 8 to 25 Miles - Fixed			**	
DS3 Over 8 to 25 Miles - per mile			**	

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

		Recurring	NRC	Recurring	NRC
	DS3 Over 25 to 50 Miles - Fixed			**	
	DS3 Over 25 to 50 Miles - per mile			**	
	DS3 Over 50 Miles - Fixed			**	
	DS3 Over 50 Miles - per mile			**	
Multiplexing					
	Multiplexing DS1 to DS0			\$128.51	\$163.86 *
	Multiplexing DS3 to DS1			\$141.61	\$163.86 *
	DS1 Transport Mux				\$157.48 *
	DS3 Transport Mux				\$157.48 *
	DS0 Channel Performance				
	DS0 Low Side Channelization			**	
	DS1/DS0 MUX, Low Side Channelization			**	**
	Concentration Capability			**	
Unbundled Packet Switching					
	Customer Channel			**	
	Customer Channel and Shared Distribution Loop				**
	Customer Channel and Unbundled Distribution Loop				**
	Customer Channel and CLEC Provided Loop				**
	DSLAM			**	**
	Virtual Transport			**	**
	Unbundled Packet Switch Loop Capability			**	**
	Unbundled Packet Switch Interface Port				
	DS3 Interface			**	**
	DS1 Interface			**	**
	Unbundled Pack Switch DSLAM Functionality			**	**
ANCILLARY SERVICES					
Interim Number Portability					
	Number Ported				**
	Service Establishment per route, per switch		\$20.65		**
	Service Establishment, Per Ported Number		\$4.47		**
	Service Establishment , additional number ported or changes to existing number, per number ported		\$3.32		**
	Coordinated Out of Hours Cut – Non-Sunday/Holiday				**
	Coordinated Out of Hours Cut – Sunday/Holiday				**
Local Number Portability					
	LNP Queries				**
	LNP Managed Cuts				**
	Standard Managed Cuts per person per 1/2 hour				**
	Overtime Managed Cuts per person per 1/2 hour				**
	Premium Managed Cust per person per 1/2 hour				**
911/E911					
White Pages Directory Listings, Facility Based Providers					

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	Recurring	NRC	Recurring	NRC
Primary Listing				**
Premium/Privacy Listings				**
Directory Assistance, Facility Based Providers				
Local Directory Assistance, per Call		\$0.28	**	**
National Directory Assistance, per Call			**	**
Call Branding, Set- Up and Recording				**
Loading Brand /Per Switch				**
Call Completion Link, per call			**	
Directory Assistance List Information				
Initial Database Load per Listing			**	
Reload of Database, per Listing			**	
Daily Updates, per Listing			**	
One-time Set-Up Fee, per Hour				**
Media Charges for File Delivery				
Electronic Transmission			**	
Tapes (charges only apply if this is selected as the normal delivery medium for daily updates)			**	
Shipping Charges (for tape delivery)			**	
Toll and Assistance Operator Services, Facility Based Providers				
Option A - per message				
Operator Handled Calling Card			**	
Machine Handled Calling Card			**	
Station Call			**	
Person Call			**	
Connect to Directory Assistance			**	
Busy Line Verify, per call	\$0.72		**	
Busy Line Interrupt	\$0.87		**	
Operator Assistance, per call			**	
Option B - per operator work section and computer handled call				
Operator Handled, per Operator Work Second			**	
Machine Handled, per call			**	
Call Branding, Set-Up & Recording				**
Loading Brand/Per Switch				**
Access to Poles, Ducts, Conduits and Rights of Way				
Pole Inquiry Fee, per Mile				**
Innerduct Inquiry Fee, per Mile				**
ROW Inquiry Fee				**
ROW Document Preparation				**
Field Verification Fee, pr Pole				**
Field Verification Fee, per Manhole				**
Planner Verification, per Manhole				**
Manhole Verification Inspector, per Manhole				**
Manhole Make Ready Inspector, per Manhole				**
Make-Ready Work, per Foot Innerduct				**
Pole Attachment Fee, per Foot, per Year			**	
Innerduct Occupancy Fee, per Foot, per Year			**	
Operational Support Systems				

ACC STAFF REBUTTAL PRICING PROPOSAL

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Current Rates

ACC Staff
Pricing Proposal

	(1)		(2)	
	Recurring	NRC	Recurring	NRC
Development & Enhancements, per Order				**
Ongoing Maintenance, per Order			**	
Daily Usage Record File, per Record			**	
Trouble Isolation Charge			**	
Bona Fide Request Process				
Processing Fee			**	**

* Qwest proposed Rates in Qwest Exhibit TKM-01R multiplied by 61%. See Testimony of William Dunkel.
** At this time Staff is not proposing a rate for this item.

**SUMMARY OF EACH OF THE QWEST REVISIONS, AND
THEIR IMPACT ON MY RATE RECOMMENDATIONS**

I. QWEST overall cost changes to QWEST models:

•Qwest changed from a 10.37% overall cost of money to a 9.61% overall cost of money (Million rebuttal, P. 15).

•My recommended rates: I was using 9.61% COM in the rates recommended in my Direct Testimony (Schedule WD-6) and continue to do so on Rebuttal Schedule WD-17.

•QWEST changed from using "average" net salvage values to using "net" salvage values in the calculation of the depreciation factors. (Gude Rebuttal, p. 3).

•My recommended rates: I was correctly using the ACC approved "net" salvage values in the rates recommended in my Direct Testimony (Schedule WD-6) and continue to do so on Rebuttal Schedule WD-17.

•QWEST changed the composite income tax rate from 39.7 to 39.5292 to reflect a recent state tax change (Gude Rebuttal., P. 3)

•My recommended rates: I use the 39.5292 rate into the recommendations on Rebuttal Schedule WD-17. I used this as an input to the HAI run in Rebuttal Schedule WD-19.

II. Additional QWEST changes to the UNE loop recurring rates, and other rates they calculated using the ICM.

•QWEST changed the "total installation factors" (TIF), which are inputs to their ICM. (Gude Rebuttal, P. 3)

•My recommended rates: I did not use the ICM. I used the ACC and FCC approved inputs in the HAI.

•QWEST changed the placement activity mix for Density Group 5 and the Rural Feeder, which are inputs to the ICM. (Buckley Rebuttal, P. 2)

•My recommended rates: I did not use the ICM. I used the ACC and FCC approved inputs in the HAI.

•Although I could not find this discussed in the QWEST testimony, discovery indicates QWEST made another change in the UNE loop rate calculation. In QWEST's new filing:

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•My recommended rates: I was using AT&T optimizer to establish the zones in the rates recommended in my Direct Testimony (Schedule WD-6) and continue to do so on Rebuttal Schedule WD-17.

III. QWEST Changes to CLEC-TO-CLEC

•Specifically for the CLEC-to-CLEC costs QWEST changed certain engineering times, certain engineering labor rates, and changed certain shipping costs and the "cable hole" labor expense. (Attachment A to Qwest response to STF-233, and Million Rebuttal, P. 14)

•My recommended rates: My rate recommendations on Rebuttal Schedule WD-17 incorporate these changes.

IV. QWEST Changes to Line Sharing

•QWEST made changes which had a minor impact on the Splitter Shelf cost and charge. They also revised certain investment based factors. (Attachment B to Qwest response to STF-233)

•My recommended rates: My rate recommendations on Rebuttal Schedule WD-17 incorporate these changes.

•QWEST revised their rent calculation for the Splitter Shelf (Attachment B to Qwest response to STF-233)

•My recommended rates: In my rent calculation the air conditioning ducts are part of the building that is recovered in the rent, but QWEST does not include them in the rent. (See Dunkel Direct, P. 23-24)

IV. QWEST Changes to the Entrance Facilities

•QWEST made a number of changes to the Entrance Facilities calculations (Fleming Rebuttal, P. 30, and Attachment C to Qwest response to STF-233)

¹ 7-12-2001 FAX to staff consultant Dunkel from Norton Cutler (QWEST) in response to Staff verbal follow-up request.

•My recommended rates: My rate recommendations on Rebuttal Schedule WD-17 incorporate these changes.

V. OTHER STATED CHANGES

•Fleming's Rebuttal at page 58 states:

The study assumptions have been revised to reflect the use of this labor source only one half of the time which is more consistent with the current trend.

However QWEST did not change the mix of vendor to QWEST labor or these labor rates in the QWEST rebuttal. In discovery Qwest stated:

The labor costs for all collocation models in both the March 2001 and June 2001 cost study filings are the same because both reflect the 50% contract labor assumption. The revision referred to in Mr. Fleming's Rebuttal Testimony addresses the fact that the 41 Collocation Jobs studied were 100% Vendor labor. ... Additionally, upon review of the inputs, the 'Power' labor inputs for the Collocation Model did contain the 75% contract labor assumption. (Qwest response to Request STF 13-228)

•In their Rebuttal, Qwest addressed the current cost to book cost ratio issue. I believe that Qwest is applying this adjustment selectively, which results in inflating the cost, as discussed in my Direct. However, in the calculations of my proposed rates shown on Rebuttal Schedule WD-17, I did not make any specific adjustment for this issue.

**Arizona -- Qwest Deaveraged Loop Cost
(utilizing HM 5.2a results with FCC and ACC Inputs)**

For Sale	CLLI	Wire Center	Total Lines	Percent of Total	Total Loop Cost	NID	Distribution	Feeder	Concentration	Zone
38	Total (Before Sale of Exchanges)		3,173,116		\$ 13.60	\$ 0.63	\$ 8.20	\$ 1.42	\$ 3.35	
0	Zone 1 (38 Wire Centers)		2,160,203	68.1%	\$ 9.93	\$ 0.62	\$ 5.24	\$ 1.04	\$ 3.04	
6	Zone 2 (35 Wire Centers)		773,479	24.4%	\$ 14.96	\$ 0.65	\$ 9.66	\$ 1.39	\$ 3.26	
32	Zone 3 (63 Wire Centers)		239,434	7.5%	\$ 42.22	\$ 0.67	\$ 30.18	\$ 4.94	\$ 6.42	
	Total (After Sale of Exchanges)		2,993,026		\$ 12.35	\$ 0.63	\$ 7.27	\$ 1.27	\$ 3.18	
	Zone 1 (38 Wire Centers)		2,160,203	72.2%	\$ 9.93	\$ 0.62	\$ 5.24	\$ 1.04	\$ 3.04	
	Zone 2 (29 Wire Centers)		672,184	22.5%	\$ 14.60	\$ 0.65	\$ 9.37	\$ 1.41	\$ 3.17	
	Zone 3 (31 Wire Centers)		160,639	5.4%	\$ 35.41	\$ 0.68	\$ 25.79	\$ 3.86	\$ 5.06	

Source:
 AT&T's Working Hatfield Model (Exhibit DKD-1) and AT&T's Deaveraging Optimizer (Exhibit DKD-12).
 ACC Decision No. 60635, dated Jan 30, 1998.
 FCC Inputs Order (FCC 99-304), Released Nov 2, 1999.
 Depreciation rates from ACC Decision 61945, dated Sept 17, 1999 and Decision No. 62507, dated May 4, 2000.
 Includes changes to tax rate and NID, SAI and drop "adjusted projection life" as discussed in the Rebuttal Testimony of William Dunkel.
 Incorporates changes from Qwest Exhibit WLF-3.

Arizona -- Qwest Deaveraged Loop Cost
(utilizing HM 5.2a results with FCC and ACC Inputs)

For Sale	CLLI	Wire Center	Total Lines	Percent of Total	Total Loop Cost	NID	Distribution	Feeder	Concentration	Zone
0	PHNXAZNO	PHOENIX-NORTH	121,757	3.84%	\$ 7.67	\$ 0.53	\$ 3.92	\$ 1.18	\$ 2.05	1
0	PHNXAZMA	PHOENIX-MAIN	102,754	3.24%	\$ 8.07	\$ 0.44	\$ 4.19	\$ 1.00	\$ 2.44	1
0	PHNXAZSE	PHNX SOUTHEAST CAP	27,068	0.85%	\$ 9.05	\$ 0.52	\$ 4.96	\$ 1.58	\$ 1.99	1
0	TEMPAZMC	MCCLINTOCK	92,175	2.90%	\$ 9.20	\$ 0.62	\$ 4.41	\$ 0.88	\$ 3.29	1
0	PHNXAZNE	PHOENIX-NORTHEAST	76,966	2.43%	\$ 9.25	\$ 0.58	\$ 4.71	\$ 1.20	\$ 2.76	1
0	PHNXAZEA	PHOENIX-EAST	43,203	1.36%	\$ 9.27	\$ 0.54	\$ 4.91	\$ 1.15	\$ 2.68	1
0	TEMPAZMA	TEMPE MAIN	76,246	2.40%	\$ 9.38	\$ 0.55	\$ 4.60	\$ 1.09	\$ 3.13	1
0	SCDLAZMA	SCOTTSDALE MAIN	82,828	2.61%	\$ 9.47	\$ 0.62	\$ 5.01	\$ 1.23	\$ 2.62	1
0	TCSNAZMA	TUCSON MAIN	94,741	2.99%	\$ 9.72	\$ 0.54	\$ 5.54	\$ 1.09	\$ 2.54	1
0	PHNXAZMY	PHNX-MAYVALE CAP	41,152	1.30%	\$ 9.81	\$ 0.68	\$ 5.24	\$ 1.07	\$ 2.82	1
0	SCDLAZTH	THUNDERBIRD	87,430	2.76%	\$ 9.81	\$ 0.59	\$ 4.98	\$ 0.76	\$ 3.47	1
0	PHNXAZNW	PHOENIX-NORTHWEST	58,804	1.85%	\$ 9.86	\$ 0.65	\$ 5.13	\$ 1.33	\$ 2.74	1
0	CHNDAZWE	CHANDLER WEST	44,578	1.40%	\$ 9.89	\$ 0.61	\$ 4.45	\$ 0.97	\$ 3.86	1
0	SPRSAZWE	SUPERSTITION WEST	89,551	2.82%	\$ 9.93	\$ 0.68	\$ 5.07	\$ 0.80	\$ 3.38	1
0	PHNXAZMR	PHOENIX-MID RIVERS	57,770	1.82%	\$ 9.96	\$ 0.69	\$ 5.07	\$ 1.05	\$ 3.15	1
0	PHNXAZSY	PHOENIX-SUNNYSLOPE	61,763	1.95%	\$ 10.01	\$ 0.60	\$ 5.17	\$ 1.15	\$ 3.09	1
0	PHNXAZPR	PHNX PEORIA	46,168	1.45%	\$ 10.08	\$ 0.67	\$ 5.28	\$ 0.98	\$ 3.15	1
0	SCDLAZSH	SHEA	46,505	1.47%	\$ 10.11	\$ 0.67	\$ 5.33	\$ 0.90	\$ 3.23	1
0	PHNXAZGR	PHOENIX-GREENWAY	97,942	3.09%	\$ 10.32	\$ 0.66	\$ 5.04	\$ 1.23	\$ 3.39	1
0	GLDLAZMA	LENDALE MAIN	58,568	1.85%	\$ 10.35	\$ 0.67	\$ 5.40	\$ 1.17	\$ 3.11	1
0	CHNDAZSO	CHANDLER SOUTH	17,742	0.56%	\$ 10.37	\$ 0.70	\$ 5.57	\$ 0.21	\$ 3.88	1
0	SPRSAZMA	SUPERSTITION MAIN	42,511	1.34%	\$ 10.37	\$ 0.72	\$ 5.66	\$ 0.71	\$ 3.28	1
0	AGFIAZSR	SUNRISE	35,788	1.13%	\$ 10.39	\$ 0.71	\$ 5.37	\$ 0.46	\$ 3.85	1
0	MESAAZGI	GILBERT	68,756	2.17%	\$ 10.40	\$ 0.65	\$ 5.92	\$ 0.75	\$ 3.08	1
0	PHNXAZPP	PHOENIX-PECOS	16,293	0.51%	\$ 10.43	\$ 0.70	\$ 4.59	\$ 0.95	\$ 4.19	1
0	TCSNAZFW	FLOWING WELLS	37,204	1.17%	\$ 10.68	\$ 0.64	\$ 5.88	\$ 1.17	\$ 3.00	1
0	TCSNAZEA	TUCSON EAST	67,013	2.11%	\$ 10.71	\$ 0.64	\$ 5.71	\$ 1.30	\$ 3.05	1
0	DRVYAZNO	DEER VALLEY NORTH	47,767	1.51%	\$ 10.78	\$ 0.64	\$ 6.06	\$ 1.11	\$ 2.97	1
0	PHNXAZCA	PHOENIX-CACTUS	91,926	2.90%	\$ 10.79	\$ 0.67	\$ 5.30	\$ 1.28	\$ 3.54	1
0	PHNXAZWE	PHOENIX WEST CAP	46,151	1.45%	\$ 10.83	\$ 0.58	\$ 6.04	\$ 1.06	\$ 3.15	1
0	BRDSAZMA	BEARDSLEY	38,947	1.23%	\$ 10.85	\$ 0.70	\$ 6.20	\$ 0.80	\$ 3.13	1
0	PHNXAZBW	PHOENIX-BETHANY WE	17,258	0.54%	\$ 11.04	\$ 0.70	\$ 5.75	\$ 1.20	\$ 3.39	1
0	CHNDAZMA	CHANDLER MAIN	67,545	2.13%	\$ 11.17	\$ 0.67	\$ 5.93	\$ 0.91	\$ 3.66	1
0	PRVYAZPP	PINNACLE PEAK	46,912	1.48%	\$ 11.18	\$ 0.69	\$ 6.65	\$ 0.48	\$ 3.37	1
0	TCSNAZCR	TCSN CRAYCROFT	42,964	1.35%	\$ 11.24	\$ 0.62	\$ 6.48	\$ 1.21	\$ 2.93	1
0	TCSNAZCA	CATALINA	30,001	0.95%	\$ 11.27	\$ 0.68	\$ 6.78	\$ 1.06	\$ 2.76	1

Arizona -- Qwest Deaveraged Loop Cost
(utilizing HM 5.2a results with FCC and ACC Inputs)

For Sale	CLLI	Wire Center	Total Lines	Percent of Total	Total Loop Cost	NID	Distribution	Feeder	Concentration	Zone
0	TCSNAZCO	CORTARO	20,452	0.64%	\$ 11.73	\$ 0.68	\$ 6.95	\$ 1.46	\$ 2.64	1
0	LTPKAZMA	LITCHFIELD PARK	17,004	0.54%	\$ 11.73	\$ 0.67	\$ 7.85	\$ 0.92	\$ 2.28	1
0	PHNXAZ81	PHOENIX-FOOTHILLS	9,207	0.29%	\$ 12.23	\$ 0.71	\$ 7.44	\$ 1.52	\$ 2.56	2
0	MESAAZMA	MESA	107,614	3.39%	\$ 12.42	\$ 0.63	\$ 7.15	\$ 1.13	\$ 3.51	2
0	SRVSZAZMA	SIERRA VISTA MAIN	27,857	0.88%	\$ 12.58	\$ 0.60	\$ 7.91	\$ 1.11	\$ 2.95	2
0	TCSNAZNO	TUCSON NORTH-1A CA	51,839	1.63%	\$ 12.72	\$ 0.67	\$ 7.57	\$ 0.85	\$ 3.63	2
0	TCSNAZSO	TCSN SOUTH CAP	41,527	1.31%	\$ 12.85	\$ 0.63	\$ 7.66	\$ 1.18	\$ 3.37	2
0	TCSNAZRN	RINCON	74,308	2.34%	\$ 12.97	\$ 0.67	\$ 7.55	\$ 1.30	\$ 3.45	2
0	PHNXAZSO	PHOENIX-SOUTH	32,345	1.02%	\$ 13.36	\$ 0.63	\$ 8.15	\$ 1.12	\$ 3.45	2
0	GDYRAZCW	COLDWATER	11,101	0.35%	\$ 13.73	\$ 0.64	\$ 8.70	\$ 1.33	\$ 3.05	2
0	FLGSZAZMA	FLAGSTAFF MAIN	34,731	1.09%	\$ 14.03	\$ 0.57	\$ 8.78	\$ 2.17	\$ 2.50	2
0	TLSNAZMA	TOLLESON	12,736	0.40%	\$ 14.06	\$ 0.65	\$ 9.42	\$ 1.10	\$ 2.90	2
1	YUMAAZMA	YUMA	35,352	1.11%	\$ 14.25	\$ 0.62	\$ 8.72	\$ 0.72	\$ 4.19	2
0	PRSCAZEA	PRESCOTT EAST	17,411	0.55%	\$ 14.50	\$ 0.67	\$ 10.13	\$ 1.18	\$ 2.52	2
0	TCSNAZTV	TANQUE VERDE	13,498	0.43%	\$ 15.79	\$ 0.69	\$ 11.51	\$ 1.04	\$ 2.55	2
0	PRSCAZMA	PRESCOTT MAIN	42,646	1.34%	\$ 15.81	\$ 0.63	\$ 10.68	\$ 1.69	\$ 2.82	2
0	SPRSZAZEA	SUPERSTITION EAST	30,843	0.97%	\$ 15.87	\$ 0.70	\$ 10.97	\$ 0.98	\$ 3.23	2
0	FLGSZAZSO	FLAGSTAFF SOUTH	2,685	0.08%	\$ 15.89	\$ 0.72	\$ 11.49	\$ 2.15	\$ 1.53	2
0	PYSNAZMA	PAYSON	13,924	0.44%	\$ 15.93	\$ 0.65	\$ 10.19	\$ 2.47	\$ 2.61	2
0	FTMDAZMA	FORT MCDOWELL	17,407	0.55%	\$ 15.96	\$ 0.68	\$ 10.36	\$ 2.72	\$ 2.21	2
0	SEDNAZSO	SEDONA SOUTH	5,083	0.16%	\$ 16.34	\$ 0.68	\$ 11.78	\$ 1.62	\$ 2.25	2
0	CVCKAZMA	CAVE CREEK	19,621	0.62%	\$ 16.52	\$ 0.67	\$ 11.73	\$ 1.04	\$ 3.07	2
0	SEDNAZMA	SEDONA	15,177	0.48%	\$ 17.09	\$ 0.60	\$ 11.48	\$ 1.85	\$ 3.15	2
0	MSPKAZMA	MUNDS PARK	2,641	0.08%	\$ 17.12	\$ 0.71	\$ 12.11	\$ 0.24	\$ 4.05	2
0	TCSNAZSE	TUCSON SOUTHEAST	10,067	0.32%	\$ 17.43	\$ 0.68	\$ 12.32	\$ 1.21	\$ 3.21	2
0	SNMNAZMA	SAN MANUEL	2,027	0.06%	\$ 17.73	\$ 0.64	\$ 11.54	\$ 3.64	\$ 1.91	2
1	YUMAAZSE	YUMA SOUTHEAST	25,666	0.81%	\$ 18.07	\$ 0.63	\$ 11.87	\$ 1.44	\$ 4.13	2
0	CRNDAZMA	CORONADO	11,544	0.36%	\$ 18.22	\$ 0.70	\$ 12.27	\$ 1.94	\$ 3.31	2
0	CSGRAZMA	CASA GRANDE	18,627	0.59%	\$ 18.37	\$ 0.63	\$ 12.89	\$ 1.72	\$ 3.13	2
1	YUMAAZFT	YUMA FORTUNA	13,610	0.43%	\$ 18.43	\$ 0.72	\$ 12.68	\$ 0.48	\$ 4.55	2
1	PAGEAZMA	PAGE	5,742	0.18%	\$ 20.05	\$ 0.60	\$ 14.20	\$ 0.96	\$ 4.29	2
1	SFFRAZMA	SAFFORD	12,270	0.39%	\$ 20.21	\$ 0.63	\$ 14.85	\$ 2.23	\$ 2.50	2
0	CTWDAZSO	COTTONWOOD-SOUTH	2,804	0.09%	\$ 20.24	\$ 0.71	\$ 15.37	\$ 0.12	\$ 4.04	2
1	DGLSAZMA	DOUGLAS	8,655	0.27%	\$ 20.46	\$ 0.65	\$ 14.67	\$ 3.01	\$ 2.13	2
0	FLGSAZEA	FLAGSTAFF EAST	17,316	0.55%	\$ 20.80	\$ 0.65	\$ 13.51	\$ 3.43	\$ 3.21	2
0	NGLSAZMW	NOGALES MIDWAY	12,204	0.38%	\$ 20.95	\$ 0.59	\$ 15.92	\$ 1.38	\$ 3.06	2

Arizona -- Qwest Deaveraged Loop Cost
(utilizing HM 5.2a results with FCC and ACC Inputs)

For Sale	CLLI	Wire Center	Total Lines	Percent of Total	Total Loop Cost	NID	Distribution	Feeder	Concentration	Zone
0	CTWDAZMA	COTTONWOOD-MAIN	13,394	0.42%	\$ 21.31	\$ 0.64	\$ 15.35	\$ 1.43	\$ 3.88	2
0	NGLSAZ03	NOGALES RIO RICO	351	0.01%	\$ 22.32	\$ 0.66	\$ 19.13	\$ 2.10	\$ 0.44	3
0	GNVYAZMA	GREEN VALLEY	19,727	0.62%	\$ 22.36	\$ 0.69	\$ 15.45	\$ 2.71	\$ 3.52	3
0	TCSNAZWE	TUCSON WEST	6,142	0.19%	\$ 22.42	\$ 0.72	\$ 16.58	\$ 1.53	\$ 3.59	3
1	GLOBAZMA	GLOBE	8,890	0.28%	\$ 23.72	\$ 0.63	\$ 17.19	\$ 2.94	\$ 2.96	3
0	ELOYAZ01	ELOY	6,159	0.19%	\$ 24.28	\$ 0.68	\$ 15.65	\$ 2.95	\$ 5.00	3
1	SMTNAZMA	SOMERTON	7,780	0.25%	\$ 24.75	\$ 0.68	\$ 18.76	\$ 1.43	\$ 3.88	3
1	SPRRAZMA	SUPERIOR	1,510	0.05%	\$ 24.90	\$ 0.67	\$ 16.39	\$ 3.14	\$ 4.70	3
0	TCSNAZSW	TUCSON SOUTHWEST	19,402	0.61%	\$ 25.02	\$ 0.71	\$ 17.59	\$ 2.12	\$ 4.60	3
0	NGLSAZMA	NOGALES	6,732	0.21%	\$ 25.36	\$ 0.58	\$ 18.55	\$ 2.49	\$ 3.74	3
1	BISBAZMA	BISBEE	5,777	0.18%	\$ 25.38	\$ 0.63	\$ 17.59	\$ 3.40	\$ 3.76	3
0	HGLYAZMA	HIGLEY	5,765	0.18%	\$ 25.42	\$ 0.65	\$ 20.21	\$ 1.45	\$ 3.10	3
0	WHTKAZMA	WHITE TANKS	2,383	0.08%	\$ 26.51	\$ 0.70	\$ 21.18	\$ 2.02	\$ 2.61	3
1	WNSLAZMA	WINSLOW	5,223	0.16%	\$ 27.45	\$ 0.64	\$ 19.14	\$ 2.61	\$ 5.07	3
0	CLDGAZMA	COOLIDGE	5,650	0.18%	\$ 27.63	\$ 0.66	\$ 20.42	\$ 2.58	\$ 3.97	3
0	GMVRAZMA	CAMP VERDE	7,526	0.24%	\$ 29.30	\$ 0.67	\$ 23.07	\$ 2.61	\$ 2.95	3
0	SRVSAZSO	SIERRA VISTA SO	8,259	0.26%	\$ 29.40	\$ 0.71	\$ 20.89	\$ 2.73	\$ 5.07	3
0	PHNXAZLV	PHOENIX-LAVEEN	2,860	0.09%	\$ 30.39	\$ 0.67	\$ 24.45	\$ 0.69	\$ 4.57	3
0	FTMDAZNO	RIO VERDE	2,355	0.07%	\$ 31.82	\$ 0.71	\$ 21.10	\$ 4.91	\$ 5.10	3
0	HGLYAZQC	QUEEN CREEK	5,829	0.18%	\$ 32.93	\$ 0.68	\$ 23.97	\$ 2.45	\$ 5.83	3
0	BCKYAZMA	BUCKEYE	8,482	0.27%	\$ 33.20	\$ 0.66	\$ 24.57	\$ 3.13	\$ 4.83	3
1	MIAMAZMA	MIAMI	2,139	0.07%	\$ 34.25	\$ 0.63	\$ 24.21	\$ 3.95	\$ 5.45	3
0	NWRVAZMA	NEW RIVER	5,331	0.17%	\$ 34.97	\$ 0.67	\$ 28.01	\$ 1.46	\$ 4.83	3
1	TCSNAZML	MOUNT LEMMON	567	0.02%	\$ 35.16	\$ 0.62	\$ 20.33	\$ 1.55	\$ 12.66	3
1	WCBGAZMA	WICKENBURG	6,250	0.20%	\$ 37.11	\$ 0.64	\$ 26.76	\$ 5.60	\$ 4.11	3
0	SRVSAZNO	SIERRA VISTA NO	2,312	0.07%	\$ 37.92	\$ 0.69	\$ 30.35	\$ 3.03	\$ 3.84	3
0	MARNAZ02	MARANA WEST	8,379	0.26%	\$ 38.42	\$ 0.68	\$ 27.60	\$ 3.99	\$ 6.16	3
0	FLRNAZMA	FLORENCE	5,358	0.17%	\$ 40.31	\$ 0.66	\$ 26.86	\$ 6.83	\$ 5.96	3
1	HYDNAZMA	HAYDEN	926	0.03%	\$ 40.92	\$ 0.63	\$ 27.53	\$ 2.67	\$ 10.08	3
0	CHVYAZMA	CHINO VALLEY	7,555	0.24%	\$ 41.63	\$ 0.68	\$ 30.67	\$ 4.20	\$ 6.08	3
1	BNSNAZMA	BENSON	5,391	0.17%	\$ 41.77	\$ 0.66	\$ 29.15	\$ 7.12	\$ 4.85	3
0	PINEAZMA	PINE	3,051	0.10%	\$ 42.05	\$ 0.70	\$ 32.71	\$ 2.71	\$ 5.92	3
0	HMBLAZMA	HUMBOLDT	4,749	0.15%	\$ 45.05	\$ 0.70	\$ 33.90	\$ 5.15	\$ 5.30	3
0	ORCLAZMA	ORACLE	1,837	0.06%	\$ 48.20	\$ 0.69	\$ 35.53	\$ 6.42	\$ 5.56	3
1	WLMSAZMA	WILLIAMS	3,685	0.12%	\$ 52.47	\$ 0.64	\$ 39.41	\$ 7.15	\$ 5.27	3
1	PLMNAZMA	PALOMINAS	843	0.03%	\$ 58.57	\$ 0.70	\$ 42.30	\$ 6.84	\$ 8.73	3

Arizona -- Qwest Deaveraged Loop Cost
(utilizing HM 5.2a results with FCC and ACC Inputs)

For Sale	CLLI	Wire Center	Total Lines	Percent of Total	Total Loop Cost	NID	Distribution	Feeder	Concentration	Zone
0	VAILAZSO	VAIL SOUTH	2,794	0.09%	\$ 59.61	\$ 0.70	\$ 41.48	\$ 9.27	\$ 8.16	3
1	PTGNAZEL	PATAGONIA ELGIN	1,173	0.04%	\$ 59.73	\$ 0.67	\$ 40.84	\$ 8.74	\$ 9.48	3
1	BNSNAZSD	SAINT DAVID	1,083	0.03%	\$ 60.54	\$ 0.71	\$ 44.65	\$ 6.50	\$ 8.69	3
1	CRCYAZMA	CIRCLE CITY	1,650	0.05%	\$ 62.31	\$ 0.70	\$ 42.35	\$ 10.66	\$ 8.60	3
1	WLCXAZMA	WILCOX	4,523	0.14%	\$ 63.47	\$ 0.62	\$ 46.43	\$ 10.73	\$ 5.68	3
0	BLCNAZMA	BLACK CANYON	1,794	0.06%	\$ 65.06	\$ 0.68	\$ 48.38	\$ 6.28	\$ 9.72	3
1	KRNYAZMA	KEARNY	1,395	0.04%	\$ 65.76	\$ 0.66	\$ 45.28	\$ 11.23	\$ 8.59	3
1	TMBSAZMA	TOMBSTONE	1,267	0.04%	\$ 72.24	\$ 0.67	\$ 57.04	\$ 5.61	\$ 8.93	3
1	STFDZAZMA	STANFIELD	1,233	0.04%	\$ 72.97	\$ 0.68	\$ 55.10	\$ 8.39	\$ 8.81	3
1	WHTLAZMA	WHITLOW	737	0.02%	\$ 74.04	\$ 0.70	\$ 64.56	\$ 1.37	\$ 7.41	3
1	MRCPAZMA	MARICOPA	2,174	0.07%	\$ 80.90	\$ 0.67	\$ 64.02	\$ 7.41	\$ 8.80	3
1	TNGKAZMA	TONTO CREEK	1,176	0.04%	\$ 82.24	\$ 0.70	\$ 59.61	\$ 13.04	\$ 8.89	3
1	PIMAAZMA	PIMA	1,478	0.05%	\$ 82.37	\$ 0.70	\$ 57.36	\$ 13.63	\$ 10.68	3
1	DDVLAZNM	DUDLEYVILLE	484	0.02%	\$ 82.48	\$ 0.69	\$ 65.55	\$ 7.92	\$ 8.31	3
0	AZCYAZ03	ARIZONA CITY	1,405	0.04%	\$ 84.06	\$ 0.72	\$ 55.55	\$ 16.20	\$ 11.59	3
0	MAYRAZMA	MAYER	1,296	0.04%	\$ 89.26	\$ 0.73	\$ 69.98	\$ 9.44	\$ 9.11	3
1	JSCYAZMA	JOSEPH CITY	727	0.02%	\$ 91.61	\$ 0.61	\$ 69.29	\$ 7.64	\$ 14.07	3
1	WLTNAZMA	WELLTON	2,390	0.08%	\$ 91.74	\$ 0.68	\$ 65.59	\$ 16.30	\$ 9.17	3
0	VAILAZNO	VAIL NORTH	1,419	0.04%	\$ 92.21	\$ 0.70	\$ 68.75	\$ 14.07	\$ 8.71	3
0	TUBCAZMA	TUBAC	2,566	0.08%	\$ 95.73	\$ 0.68	\$ 71.94	\$ 12.93	\$ 10.17	3
1	GLBNAZMA	GILA BEND	1,187	0.04%	\$ 101.52	\$ 0.63	\$ 72.73	\$ 11.84	\$ 16.32	3
0	CMVRAZRR	RIMROCK	1,522	0.05%	\$ 112.44	\$ 0.71	\$ 71.14	\$ 27.46	\$ 13.13	3
1	MMTHAZMA	MAMMOTH	891	0.03%	\$ 119.75	\$ 0.69	\$ 82.01	\$ 21.85	\$ 15.20	3
1	YRNLAZMA	YARNELL	1,739	0.05%	\$ 121.53	\$ 0.68	\$ 88.37	\$ 19.91	\$ 12.57	3
1	ASFKAZMA	ASHFORK	630	0.02%	\$ 123.76	\$ 0.68	\$ 96.73	\$ 12.74	\$ 13.61	3
0	WNBGAZ01	WINTERSBURG	1,649	0.05%	\$ 126.59	\$ 0.68	\$ 95.33	\$ 17.51	\$ 13.07	3
1	GRCNAZMA	GRAND CANYON	2,987	0.09%	\$ 196.13	\$ 0.53	\$ 104.44	\$ 10.04	\$ 81.13	3
1	PTGNAZMA	PATAGONIA	890	0.03%	\$ 206.87	\$ 0.68	\$ 132.42	\$ 52.16	\$ 21.61	3

AZ_Mountain Bell-Arizon_WDA Rebuttal WLF-3_DZ.xls

	Annual Cost	Units	Unit Cost
End office switching	\$ 132,629,488		
Line Port	\$ 39,788,846	2,959,791 switched lines	\$ 1.12 per line/month
Non-Line Port	\$ 92,840,642	62,141,633.323 actual minutes	\$ 0.00149 per actual minute (for rate per DEM, see "Cost detail" sheet)
Signaling network elements	\$ 5,062,151		
Links	\$ 232,794	507 links	\$ 38.28 per link per month
STP	\$ 2,527,382	41,094,682.805 TCAP+ISUP msgs	\$ 0.00006 per signaling message
SCP	\$ 2,301,975	2,118,313.400 TCAP queries	\$ 0.00109 per query
Transport network elements			
<i>Dedicated</i>			
Sw+Sp Transport	\$ 15,019,447	333,518 trunks	\$ 3.75 per DS-0 equivalent per month
Switched	\$ 5,412,698	120,193 trunks	\$ 0.00037 per minute
Special	\$ 9,606,748	213,325 trunks	\$ 8.83 per DS-0 equivalent per month
Transmission Terminal	\$ 35,329,364	333,518 trunks	\$ 0.00088 per minute
			\$ 0.00125 total per minute
<i>Common</i>			
Transport	\$ 2,334,791	3,703,400.627 minutes	\$ 0.00062 per minute per leg (orig or term)
Transmission Terminal	\$ 3,740,075	3,703,400.627 minutes	\$ 0.00100 per minute
			\$ 0.00162 total per minute
<i>Direct</i>			
Transport	\$ 8,351,866	16,120,464.725 minutes	\$ 0.00052 per minute
Transmission Terminal	\$ 16,944,601	16,120,464.725 minutes	\$ 0.00105 per minute
			\$ 0.00157 total per minute
Tandem switch	\$ 1,910,195	3,322,868.975 minutes	\$ 0.00057 per minute
Operator systems	\$ 6,630,101		
Public Telephones	\$ 4,913,603		
Total (w/ Public)	\$ 750,213,687		
Total cost of switched network elements (w/o Public)	\$ 19.10	per line/month	

The following pages are from the FCC Model output file entitled "AZ_Mountain Bell-Arizon_Default Scenario_WC.xls" which is available on the FCC website at:

<http://www.fcc.gov/ccb/apd/hcpm/>

This is the output file used by the FCC for determining High Cost Loop Support for Qwest in Arizona.

User Adjustable Inputs

Distribution Input	Current Scenario Value	Default Scenario Value
Distribution Cable Fill - 0	0.50	0.50
Distribution Cable Fill - 5	0.55	0.55
Distribution Cable Fill - 100	0.55	0.55
Distribution Cable Fill - 200	0.60	0.60
Distribution Cable Fill - 650	0.65	0.65
Distribution Cable Fill - 850	0.70	0.70
Distribution Cable Fill - 2550	0.75	0.75
Distribution Cable Fill - 5000	0.75	0.75
Distribution Cable Fill - 10000	0.75	0.75

User Adjustable Inputs

Distribution Input		Current Scenario Value	Default Scenario Value
Distribution Cable Fill - 0		0.50	0.50
Distribution Cable Fill - 5		0.55	0.55
Distribution Cable Fill - 100		0.55	0.55
Distribution Cable Fill - 200		0.60	0.60
Distribution Cable Fill - 650		0.65	0.65
Distribution Cable Fill - 850		0.70	0.70
Distribution Cable Fill - 2550		0.75	0.75
Distribution Cable Fill - 5000		0.75	0.75
Distribution Cable Fill - 10000		0.75	0.75
SAI Indoor Investment 1		9,656	9,656
SAI Indoor Investment 2		7,392	7,392
SAI Indoor Investment 3		4,928	4,928
SAI Indoor Investment 4		3,352	3,352
SAI Indoor Investment 5		2,464.00	2,464.00
SAI Indoor Investment 6		1,776.00	1,776.00
SAI Indoor Investment 7		1,232.00	1,232.00
SAI Indoor Investment 8		888.00	888.00
SAI Indoor Investment 9		592.00	592.00
SAI Indoor Investment 10		296.00	296.00
SAI Indoor Investment 11		148.00	148.00
SAI Indoor Investment 12		98.00	98.00
SAI Outdoor Investment 1		10,000.00	10,000.00
SAI Outdoor Investment 2		8,200.00	8,200.00
SAI Outdoor Investment 3		6,000.00	6,000.00
SAI Outdoor Investment 4		4,300.00	4,300.00
SAI Outdoor Investment 5		3,400.00	3,400.00
SAI Outdoor Investment 6		2,400.00	2,400.00
SAI Outdoor Investment 7		1,900.00	1,900.00
SAI Outdoor Investment 8		1,400.00	1,400.00
SAI Outdoor Investment 9		1,000.00	1,000.00
SAI Outdoor Investment 10		600.00	600.00
SAI Outdoor Investment 11		350.00	350.00
SAI Outdoor Investment 12		250.00	250.00

User Adjustable Inputs

Feeder Input	Current Scenario Value	Default Scenario Value
Fiber Feeder Investment per foot - 216	13.10	13.10
Fiber Feeder Investment per foot - 144	9.50	9.50
Fiber Feeder Investment per foot - 96	7.10	7.10
Fiber Feeder Investment per foot - 72	5.90	5.90
Fiber Feeder Investment per foot - 60	5.30	5.30
Fiber Feeder Investment per foot - 48	4.70	4.70
Fiber Feeder Investment per foot - 36	4.10	4.10
Fiber Feeder Investment per foot - 24	3.50	3.50
Fiber Feeder Investment per foot - 18	3.20	3.20
Fiber Feeder Investment per foot - 12	2.90	2.90
Fiber investment/strand - foot	0.1000	0.10

User Adjustable Inputs

Switching Input	Current Scenario Value	Default Scenario Value
Constant EO Switching Investment Term, small ICO	416.11	416.11
Constant EO Switching Investment Term, BOC and large ICO	242.73	242.73

**THIS REBUTTAL SCHEDULE CONTAINS INFORMATION
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Qwest response to STF 13-231

“Engr Cost” tab from Qwest’s “cageless collo jobs.xls” file on CD 010710-0916.

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FACTOR TO CORRECT THE QWEST PROPOSED COLLOCATION RATES

	(a)	(b)	(c)	(d)
	<u>Direct Cost¹</u>	<u>Total Effective Overhead Factor</u>	<u>Overhead</u>	<u>Total</u>
			<u>((a)x (b))</u>	<u>((a)+(c))</u>
1. Qwest	\$100	.32	\$32	\$132
2. Corrected	\$70	.15	\$10.5	\$81
Ratio of Corrected to Qwest Proposed (Line 2/Line 1)				61%

¹ Direct cost correction results primarily from moving from 50% vendor (75% vendor for "power") assumption of Qwest to a 20% vendor weighting.