



BOULT CUMMINGS
CONNERS BERRY PLC

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01 AUG 10 PM 3 50

August 10, 2001

EXECUTIVE SECRETARY

David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: *Docket to Establish Generic Performance Measures, Benchmarks and
Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear David:

Enclosed please find the original and thirteen copies of the pre-filed rebuttal testimony of Tad J. Sauder on behalf of Birch Telecom in the above-captioned proceeding. Please contact me or Whitney Malone with any questions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker*
Henry Walker
*by WLM
w/permission*

HW/wlm

**BEFORE THE TENNESSEE REGULATORY
AUTHORITY**

DOCKET NO. 01-00193

REBUTTAL TESTIMONY

OF TAD J. SAUDER

ON BEHALF OF BIRCH TELECOMMUNICATIONS

AUGUST 10, 2001

1 **Q. PLEASE STATE YOUR NAME.**

2 A. My name is Tad J. (T.J.) Sauder.

3 **Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING ON**
4 **BEHALF OF BIRCH TELECOM?**

5 A. Yes.

6 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

7 A. The purpose of my testimony is to respond to the Direct Testimony of BellSouth
8 witness David A Coon, Director of Interconnection Services.

9 **Q. MR. COON'S TESTIMONY OUTLINES BELL SOUTH'S POSITION FOR**
10 **SEVERAL MEASURES THAT YOU ADDRESSED IN YOUR DIRECT**
11 **TESTIMONY. HOW DO BIRCH'S AND MR. COON'S PROPOSALS**
12 **DIFFER?**

13 A. Mr. Coon's testimony addresses the measures that I outline in my testimony. The
14 two proposals are similar in many aspects, but are materially different on the
15 benchmarks. For example, the BellSouth proposal for FOC Timeliness has a
16 benchmark of 85% of partially mechanized FOCs to be returned in 10 business
17 hours. The CLEC proposal, supported by Birch, has a benchmark for partially
18 mechanized FOCs of 95% within 5 business hours. The differences in these two
19 proposals are the percentage that needs to be met (85% vs. 95%) and the number
20 of business hours (10 hours vs. 5 hours) within which the FOC should be returned
21 to the CLEC.

1 Birch's major concern with BellSouth's proposed standard for FOC Timeliness
2 (85% within 10 business hours) is that it allows BellSouth to continue to rely on
3 manual processing to administer CLEC orders and does not incent BellSouth to
4 increase mechanization. Under the BellSouth proposal, BellSouth can take almost
5 one full business day to return a FOC to CLECs. By comparison, BellSouth retail
6 has confirmed due dates within seconds of placing an order. This difference will
7 have an extreme impact on the relative opportunity of CLECs versus BellSouth
8 retail.

9 In my Direct Testimony, I outline that increased mechanization has been one of
10 the key results of the Texas Public Utility Commission adopting the five-hour
11 FOC standard for Southwestern Bell. Keeping the Tennessee benchmark, as
12 adopted in the ITC^Deltacom arbitration, BellSouth will have the proper incentive
13 (monetary) to mechanize more CLEC LSRs and rely less on slower, less efficient
14 manual processing. As more CLEC LSRs are mechanized, less CLEC LSRs
15 require manual handling, thus BellSouth will be able to meet the five-hour FOC
16 benchmark in the aggregate when smaller numbers of CLEC orders require
17 manual handling.

18 **Q. BELLSOUTH'S FOC AND REJECT TIMELINESS PROPOSALS**
19 **INCLUDE A PHASED-IN APPROACH TO THE 10-HOUR STANDARD.**
20 **IS THIS NECCESSARY?**

21 **A.** While Birch truly believes the partially mechanized standards should be set at five
22 hours, the proposal to phase-in the partially mechanized standards (24 hours now,

1 18 hours in three months, and 10 hours in six months) needs further examination.
2 Mr. Coon rationalizes that Georgia ordered the phased-in approach, so this
3 Authority should as well. Mr. Coon fails to indicate that the Georgia Public
4 Service Commission ordered the phased in approach in January 2001 and that the
5 10-hour benchmark takes effect in August 2001. It is also interesting to point out
6 that BellSouth reports on the PMAP website, for June 2001 performance (see
7 Attachments TJS1 and TJS2), a Tennessee average of 7.68 business hours to
8 return UNE Port and Loop Combo (UNE-P) FOCs and 4.65 hours to return UNE-
9 P rejects. Clearly, these results are already well within the range BellSouth is
10 willing to commit to – even six months from now. Therefore, a phase-in period is
11 wholly unnecessary.

12 **Q. ON PAGE 69 OF MR. COON'S TESTIMONY, MR. COON STATES THAT**
13 **MANY OF THE BENCHMARKS FROM THE FEBRUARY ORDER ARE**
14 **UNREALISTIC AND UNLIKELY TO BE ACHIEVED. IS BELL SOUTH**
15 **CAPABLE OF MEETING THE ORDERED BENCHMARKS FOR**
16 **REJECT INTERVAL?**

17 **A.** Mr. Coon must not have had access to the BellSouth reported partially
18 mechanized Reject Interval data for June 2001 when conducting his analysis. The
19 June 2001 Tennessee PMAP data (see Attachment TJS2) shows that BellSouth is
20 averaging below the five-hour benchmark for UNE-P (4.65 hours) and is
21 averaging just above five-hours for resale business (5.00 hours) and resale
22 residence (5.33 hours). The five-hour benchmark is or is very close to being
23 achieved for the order categories that have the most activity. Based on a review

1 of BellSouth's own, actual performance, it is very realistic for the Authority to
2 hold BellSouth to the five-hour standard.

3 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

4 **A. Yes.**

BELLSOUTH

Attachment TJS1

Report: FOC Timeliness Partially Mech SQM

		June 2001											
Aggregate	State	Ordering Products	0 - <=4 hrs	>4 - <=8 hrs	>8 - <=10 hrs	0 - <=10 hrs	>10 - <=18 hrs	0 - <=18 hrs	>18 - <=24 hrs	0 - <=24 hrs	>24 - <=48 hrs	>48 hrs	Avg. Intvl (days)
AL		Resale Residence	45.92%	34.82%	7.53%	88.36%	7.24%	95.60%	2.95%	98.55%	1.22%	0.23%	0.24
		Resale Business	49.55%	41.88%	1.35%	92.79%	2.25%	95.05%	1.80%	96.85%	1.80%	1.35%	0.27
		Resale Design					100.00%	100.00%		100.00%			0.43
		Resale PBX			100.00%	100.00%		100.00%		100.00%			0.37
		2W Analog Loop Design	7.69%	23.08%	53.85%	84.82%	13.46%	98.08%	1.92%	100.00%			0.36
		UNE Loop + Port Combinations	42.55%	44.13%	4.29%	90.96%	6.33%	97.29%	0.90%	98.19%	1.43%	0.38%	0.23
		UNE Other Non-Design	42.55%	44.13%	4.29%	90.96%	6.33%	97.29%	0.90%	98.19%	1.43%	0.38%	0.23
		Local Transport (Unbundled Interoffice Transport)	20.00%	80.00%		100.00%		100.00%		100.00%			0.25
FL		Resale Residence	30.55%	31.81%	14.72%	77.08%	13.79%	90.87%	3.91%	94.77%	4.58%	0.64%	0.33
		Resale Business	60.70%	34.32%	4.52%	89.55%	5.19%	94.74%	1.19%	95.92%	2.00%	2.08%	0.31
		Resale Design		100.00%		100.00%		100.00%		100.00%			0.31
		Resale PBX	15.00%	56.00%	20.00%	90.00%	5.00%	95.00%		95.00%	5.00%		0.33
		Resale ISDN		66.67%		66.67%	33.33%	100.00%		100.00%			0.34
		2W Analog Loop Non-Design	67.49%	18.51%	8.74%	94.84%	3.59%	98.43%	0.90%	99.33%		0.67%	0.17
		2W Analog Loop Design	32.03%	35.94%	19.55%	87.52%	7.84%	95.16%	2.79%	97.95%	1.48%	0.56%	0.30
		UNE Loop + Port Combinations	40.33%	36.96%	7.81%	85.08%	12.23%	97.32%	0.97%	98.29%	1.33%	0.38%	0.25
		UNE ISDN	50.00%			50.00%	25.00%	75.00%		75.00%	25.00%		0.43
		UNE Other Non-Design	40.33%	36.96%	7.81%	85.08%	12.23%	97.32%	0.97%	98.29%	1.33%	0.38%	0.25
		Local Transport (Unbundled Interoffice Transport)	37.21%	41.68%	9.30%	88.37%	11.83%	100.00%		100.00%			0.23
		Resale Residence	50.59%	24.81%	8.65%	89.84%	9.66%	93.50%	3.13%	98.63%	1.80%	1.58%	0.30
		Resale Business	45.23%	41.34%	3.18%	89.76%	5.36%	96.11%	2.12%	98.23%	1.06%	0.71%	0.24
		Resale											

CLEC

GA	Design											
	Resale PBX		100.00%		100.00%		100.00%		100.00%			0.29
	2W Analog Loop Non-Design	50.00%			50.00%	50.00%	100.00%		100.00%			0.27
	2W Analog Loop Design	19.56%	48.00%	27.56%	95.11%	4.89%	100.00%		100.00%			0.27
	UNE Loop + Port Combinations	43.03%	40.21%	5.76%	89.00%	9.56%	98.56%	0.42%	98.98%	0.59%	0.42%	0.23
	UNE ISDN		50.00%	50.00%	100.00%		100.00%		100.00%			0.30
	UNE Line Sharing											
	UNE Other Non-Design	43.03%	40.21%	5.76%	89.00%	9.56%	98.56%	0.42%	98.98%	0.59%	0.42%	0.23
	Local Transport (Unbundled Interoffice Transport)	45.00%	20.00%	10.00%	75.00%	25.00%	100.00%		100.00%			0.27
KY	Resale Residence	44.71%	33.22%	7.39%	85.32%	9.44%	94.77%	3.07%	97.84%	1.93%	0.23%	0.25
	Resale Business	58.02%	34.44%	2.49%	92.95%	3.32%	95.27%	1.68%	97.93%	2.07%		0.20
	Resale Design		66.67%	33.33%	100.00%		100.00%		100.00%			0.29
	2W Analog Loop Design	4.17%	54.17%	25.00%	83.33%	4.17%	87.50%		87.50%	12.50%		0.43
	UNE Loop + Port Combinations	37.76%	44.62%	6.54%	88.92%	8.78%	97.68%	0.63%	98.31%	1.27%	0.42%	0.25
	UNE Other Non-Design	37.76%	44.62%	6.54%	88.92%	8.78%	97.68%	0.63%	98.31%	1.27%	0.42%	0.25
LA	Resale Residence	48.39%	32.81%	5.83%	87.04%	8.00%	95.04%	2.47%	97.50%	1.68%	0.81%	0.28
	Resale Business	44.64%	44.42%	2.45%	91.52%	3.78%	95.31%	1.34%	98.65%	2.01%	1.34%	0.28
	Resale Design											
	Resale PBX			100.00%	100.00%		100.00%		100.00%			0.35
	2W Analog Loop Design	12.50%	37.50%	43.75%	83.75%	6.25%	100.00%		100.00%			0.30
	UNE Loop + Port Combinations	31.71%	52.07%	4.14%	87.93%	8.83%	96.76%	0.54%	97.30%	1.98%	0.72%	0.26
	UNE ISDN	50.00%	50.00%		100.00%		100.00%		100.00%			0.18
	UNE Other Non-Design	31.71%	52.07%	4.14%	87.93%	8.83%	96.76%	0.54%	97.30%	1.98%	0.72%	0.26
	Local Transport (Unbundled Interoffice Transport)	32.50%	50.00%	15.00%	97.50%		97.50%		97.50%	2.50%		0.24
	Resale Residence	49.74%	31.48%	6.58%	87.81%	6.94%	94.75%	3.60%	98.35%	0.82%	0.82%	0.25
	Resale Business	52.84%	35.12%	3.34%	91.30%	3.68%	94.98%	1.67%	96.86%	1.67%	1.67%	0.25

MS	Resale Design			100.00%	100.00%		100.00%		100.00%			0.37
	2W Analog Loop Design		18.18%		18.18%	72.73%	90.91%	9.09%	100.00%			0.54
	UNE Loop + Port Combinations	51.75%	42.56%	1.33%	95.65%	2.78%	98.43%	0.48%	98.91%	0.73%	0.36%	0.19
	UNE Other Non-Design	51.75%	42.56%	1.33%	95.65%	2.78%	98.43%	0.48%	98.91%	0.73%	0.36%	0.19
NC	Resale Residence	56.44%	25.74%	6.08%	88.25%	6.53%	94.78%	2.70%	97.48%	2.03%	0.50%	0.23
	Resale Business	37.40%	50.65%	3.64%	91.68%	5.19%	96.88%	1.82%	98.70%	1.04%	0.26%	0.23
	Resale Design											
	Resale PBX											
	2W Analog Loop Design	26.13%	47.74%	14.96%	88.84%	8.79%	97.82%	0.71%	98.34%	1.43%	0.24%	0.28
	UNE Loop + Port Combinations	47.17%	38.24%	5.82%	89.23%	7.91%	97.14%	1.07%	98.21%	1.58%	0.20%	0.22
	UNE ISDN	5.26%	36.84%	21.05%	63.16%	28.32%	89.47%		89.47%	10.53%		0.43
	UNE Other Non-Design	47.17%	38.24%	5.82%	89.23%	7.91%	97.14%	1.07%	98.21%	1.58%	0.20%	0.22
SC	Local Transport (Unbundled Interoffice Transport)	24.14%	29.31%	18.97%	72.41%	15.52%	87.89%	3.45%	91.38%	1.72%	6.90%	0.45
	Resale Residence	48.34%	30.33%	6.38%	85.05%	8.62%	93.67%	3.70%	97.37%	1.95%	0.88%	0.28
	Resale Business	42.77%	45.28%	6.03%	93.08%	2.52%	95.60%	1.28%	96.86%	2.52%	0.63%	0.24
	Resale Design											
	Resale PBX	100.00%			100.00%		100.00%		100.00%			0.14
	2W Analog Loop Non-Design			100.00%	100.00%		100.00%		100.00%			0.36
	2W Analog Loop Design											
	UNE Loop + Port Combinations	51.40%	36.90%	2.97%	91.27%	5.93%	97.20%	1.32%	98.52%	0.99%	0.49%	0.21
	UNE ISDN											
	UNE Other Non-Design	51.40%	36.90%	2.97%	91.27%	5.93%	97.20%	1.32%	98.52%	0.99%	0.49%	0.21
	Local Transport (Unbundled Interoffice Transport)											
	Resale Residence	45.80%	28.54%	8.03%	82.37%	9.77%	92.15%	3.78%	95.92%	2.76%	1.32%	0.30
	Resale Business	43.04%	44.30%	3.80%	91.14%	2.53%	93.67%	3.80%	97.47%	1.27%	1.27%	0.27
	Resale											

TN	Design											
	2W Analog Loop Design	4.89%	52.01%	37.93%	94.83%	4.60%	99.43%	0.57%	100.00%			0.31
	UNE Loop + Port Combinations	42.08%	36.44%	4.05%	82.57%	9.40%	91.97%	1.45%	93.42%	5.13%	1.45%	0.32
	UNE ISDN	3.70%	40.74%	51.85%	96.30%	3.70%	100.00%		100.00%			0.32
	UNE Other Non-Design	42.08%	36.44%	4.05%	82.57%	9.40%	91.97%	1.45%	93.42%	5.13%	1.45%	0.32
	Local Transport (Unbundled Interoffice Transport)	18.18%	81.82%		100.00%		100.00%		100.00%			0.22

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Attachment TJS2



Report: Reject Interval Partially Mech SQM

June 2001												
Aggregate	State	Ordering Products	0 - <=1 hr	>1 - <=4 hrs	>4 - <=8 hrs	>8 - <=10 hrs	0 - <=10 hrs	>10 - <=18 hrs	0 - <=18 hrs	>18 - <=24 hrs	>24 hrs	Avg. Intvl (hrs)
	AL	Resale Residence	13.73%	36.17%	31.14%	6.18%	87.23%	7.54%	94.78%	3.46%	1.74%	6.01
		Resale Business	11.64%	42.47%	41.78%	1.37%	97.26%	2.05%	98.32%	0.66%		4.08
		Resale Design		50.00%			50.00%		50.00%		50.00%	17.58
		Resale PBX										
		2W Analog Loop Design	2.44%	24.35%	39.02%	31.71%	97.56%	2.44%	100.00%			6.35
		UNE Loop + Port Combinations	10.63%	41.05%	38.86%	2.77%	93.30%	4.80%	98.11%	1.16%	0.73%	4.67
		UNE Other Non-Design	10.63%	41.05%	38.86%	2.77%	93.30%	4.80%	98.11%	1.16%	0.73%	4.67
		Local Transport (Unbundled Interoffice Transport)			71.43%	28.57%	100.00%		100.00%			7.29
	FL	Resale Residence	12.33%	16.57%	31.55%	14.63%	75.10%	15.65%	90.75%	3.96%	5.31%	6.10
		Resale Business	17.99%	32.08%	34.23%	4.97%	89.26%	6.98%	96.24%	1.48%	2.28%	5.80
		Resale Design										
		Resale PBX		35.71%	35.71%	21.43%	92.86%		92.86%	7.14%		6.27
		Resale ISDN			100.00%		100.00%		100.00%			4.74
		2W Analog Loop Non-Design	17.78%	26.67%	32.22%	8.69%	85.56%	6.87%	92.22%	3.33%	4.44%	6.74
		2W Analog Loop Design	4.51%	17.29%	34.59%	25.56%	81.95%	9.02%	90.98%	3.76%	5.26%	6.87
		UNE Loop + Port Combinations	10.77%	26.37%	45.11%	6.69%	88.94%	8.96%	97.90%	0.58%	1.51%	5.79
		UNE ISDN				100.00%	100.00%		100.00%			8.59
		UNE Other Non-Design	10.77%	26.37%	45.11%	6.69%	88.94%	8.96%	97.90%	0.58%	1.51%	5.79
		Local Transport (Unbundled Interoffice Transport)	9.09%	16.18%	36.36%	18.18%	81.82%	9.09%	90.91%		9.09%	10.07
	GA	Resale Residence	26.00%	28.68%	23.64%	6.68%	85.40%	8.10%	94.50%	3.01%	2.48%	5.97
		Resale Business	10.66%	32.22%	45.56%	2.78%	91.11%	5.00%	96.11%	2.22%	1.67%	5.60
		Resale Design			100.00%		100.00%		100.00%			5.51
		Resale PBX										
		2W Analog Loop Non-Design				66.67%	66.67%	33.33%	100.00%			10.28
		2W Analog Loop Design	3.70%	14.81%	54.32%	19.75%	92.59%	6.17%	98.77%		1.23%	6.82
		UNE Loop + Port Combinations	24.99%	37.52%	28.79%	2.90%	94.19%	4.85%	99.05%	0.39%	0.56%	3.74
		UNE ISDN										

CLEC

UNE 100%											
	UNE Line Sharing	100.00%				100.00%		100.00%			0.02
	UNE Other Non-Design	24.98%	37.62%	28.79%	2.90%	94.19%	4.85%	99.05%	0.39%	0.56%	3.74
	Local Transport (Unbundled Interoffice Transport)			62.50%	12.50%	75.00%		75.00%	12.50%	12.50%	11.12
KY	Resale Residence	21.68%	37.64%	28.18%	3.24%	90.61%	6.80%	97.41%	2.27%	0.32%	4.36
	Resale Business	12.07%	56.03%	29.31%		97.41%	2.59%	100.00%			3.49
	Resale Design			100.00%		100.00%		100.00%			7.10
	2W Analog Loop Design	3.13%	15.63%	46.88%	31.25%	96.88%	3.13%	100.00%			6.80
	UNE Loop + Port Combinations	8.45%	34.02%	38.36%	5.25%	86.07%	13.01%	99.09%	0.46%	0.46%	5.49
	UNE Other Non-Design	8.45%	34.02%	38.36%	5.25%	86.07%	13.01%	99.09%	0.46%	0.46%	5.49
LA	Resale Residence	19.89%	33.06%	29.56%	5.06%	87.57%	9.02%	96.58%	1.84%	1.57%	5.33
	Resale Business	21.74%	32.61%	38.13%	1.09%	94.57%	2.17%	96.74%	1.63%	1.63%	4.69
	Resale Design			100.00%		100.00%		100.00%			4.88
	Resale PBX										
	2W Analog Loop Design			60.00%	40.00%	100.00%		100.00%			7.27
	UNE Loop + Port Combinations	16.28%	25.91%	43.52%	1.99%	87.71%	10.30%	98.01%	1.00%	1.00%	5.36
	UNE ISDN				100.00%	100.00%		100.00%			8.57
	UNE Other Non-Design	16.28%	25.91%	43.52%	1.99%	87.71%	10.30%	98.01%	1.00%	1.00%	5.36
	Local Transport (Unbundled Interoffice Transport)	33.33%			33.33%	66.67%		66.67%		33.33%	14.59
MS	Resale Residence	18.80%	38.36%	25.39%	6.35%	89.00%	6.35%	96.36%	2.82%	1.83%	5.25
	Resale Business	12.83%	46.52%	33.16%	1.07%	93.58%	3.21%	96.78%	1.07%	2.14%	4.40
	Resale Design						100.00%	100.00%			13.22
	2W Analog Loop Design						100.00%	100.00%			12.44
	UNE Loop + Port Combinations	12.70%	38.38%	37.57%	4.86%	93.51%	3.51%	97.03%	2.70%	0.27%	4.68
	UNE Other Non-Design	12.70%	38.38%	37.57%	4.86%	93.51%	3.51%	97.03%	2.70%	0.27%	4.68
NC	Resale Residence	22.01%	31.46%	27.18%	4.28%	84.93%	10.49%	95.42%	2.81%	1.77%	5.85
	Resale Business	9.80%	46.53%	37.96%	1.63%	95.92%	2.04%	97.96%	1.22%	0.82%	4.33
	Resale Design						100.00%	100.00%			15.76
	Resale PBX		100.00%			100.00%		100.00%			3.95
	2W Analog Loop Design	0.61%	14.02%	56.71%	11.59%	82.93%	10.37%	93.28%	4.88%	1.83%	7.79
	UNE Loop + Port Combinations	20.00%	26.88%	37.28%	5.44%	89.60%	8.48%	96.08%	0.80%	1.12%	4.99
	UNE ISDN	12.50%	12.50%	25.00%	25.00%	75.00%		75.00%		25.00%	11.92

		UNE Other Non-Design	20.00%	26.88%	37.28%	5.44%	89.80%	8.48%	98.08%	0.80%	1.12%	4.99
		Local Transport (Unbundled Interoffice Transport)	2.78%	13.89%	16.67%	19.44%	52.78%	11.11%	63.89%		36.11%	19.25
	SC	Resale Residence	16.21%	34.79%	25.14%	7.65%	63.79%	10.20%	83.99%	2.73%	3.28%	6.24
		Resale Business	6.52%	40.22%	40.22%	4.35%	91.30%	6.52%	97.83%	1.09%	1.09%	5.26
		Resale Design						100.00%	100.00%			14.07
		Resale PBX										
		2W Analog Loop Non-Design			100.00%		100.00%		100.00%			6.20
		2W Analog Loop Design	7.69%	30.77%	46.15%	11.54%	96.15%	3.86%	100.00%			4.85
		UNE Loop + Port Combinations	15.35%	34.88%	41.40%	3.72%	95.35%	3.72%	99.07%	0.47%	0.47%	4.50
		UNE ISDN			100.00%		100.00%		100.00%			7.41
		UNE Other Non-Design	15.35%	34.88%	41.40%	3.72%	95.35%	3.72%	99.07%	0.47%	0.47%	4.50
		Local Transport (Unbundled Interoffice Transport)		25.00%	25.00%	50.00%	100.00%		100.00%			7.10
	TN	Resale Residence	25.68%	29.61%	24.92%	7.40%	87.61%	7.10%	94.71%	3.78%	1.51%	5.33
		Resale Business	10.32%	27.10%	54.19%	1.29%	92.90%	5.81%	98.71%	0.85%	0.85%	5.00
		Resale Design						100.00%	100.00%			10.48
		2W Analog Loop Design	1.63%	2.44%	52.03%	38.02%	95.12%	2.44%	97.56%	1.63%	0.81%	7.87
		UNE Loop + Port Combinations	22.24%	30.22%	31.58%	5.26%	89.30%	9.34%	98.64%	0.51%	0.85%	4.65
		UNE ISDN		14.28%	42.86%	42.86%	100.00%		100.00%			8.00
		UNE Other Non-Design	22.24%	30.22%	31.58%	5.26%	89.30%	9.34%	98.64%	0.51%	0.85%	4.65
		Local Transport (Unbundled Interoffice Transport)										

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this 10th day of August, 2001.

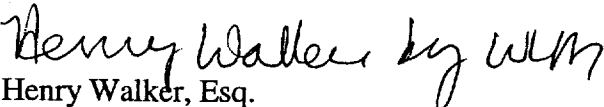
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