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Guy M. Hicks
General Counsel

March 31, 2000

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: Re: *Contested Cost Proceeding to Establish Final Cost Based Rates for Interconnection and Unbundled Network Elements*
Docket No. 97-01262

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Responses to the Staff's Data Requests issued March 23, 2000. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

203708

REQUEST: The attached list completed with each party's proposed costs for each element.

RESPONSE: BellSouth is unclear what is meant by the term "proposed costs." In BellSouth's cost studies filed in this docket, BellSouth calculated the proposed forward-looking economic cost of each unbundled network element and interconnection service at issue. Since that time, the TRA has ordered certain adjustments to BellSouth's cost studies. As BellSouth has previously explained, BellSouth disagrees with some of these adjustments and believes those adjustments have skewed the results of BellSouth's cost studies. Nevertheless, in Attachment No. 1, BellSouth has set forth the cost of each network element and interconnection service, except for unbundled loops, incorporating the adjustments to BellSouth's cost studies ordered by the TRA on November 3, 1999. Shaded areas of Attachment No. 1 indicate additions or changes that were required to include all values included in prior BellSouth's Cost Filing.

Because BellSouth does not believe that the forward-looking economic cost of an unbundled loop in Tennessee should be less than the cost calculated by the Hatfield Model, BellSouth has derived loops costs: (1) using the Hatfield Model as a starting point; and (2) developing factors that represent the difference between the cost of the various types of unbundled loops based upon BellSouth's cost studies, as adjusted by the TRA. Because the Hatfield Model only generates the cost of a two-wire voice grade analog loop (BellSouth's SL1 loop), BellSouth applied the factors it developed to calculate the cost of the other unbundled loops at issue. These calculations are explained in Attachment 2.

REQUEST: Where the cost is not available for an element, explain the reason.

RESPONSE: All requested recurring costs are available. Some of the line items on the list provided in Item No. 1 will not have a cost indicated because recurring costs are not applicable, that is, only nonrecurring costs are applicable.

REQUEST: For the following adjustments as suggested by AT&T in the BellSouth TELRIC Calculator, each party is invited to identify each UNE whose cost is affected by each adjustment:

a. Use of 100% integrated digital loop carrier and 0% universal digital loop carrier.

b. Use of 100-foot drop length for labor contract burial and installation cost.

c. Provision of loop-switching combinations

d. Removing all separate charges for vertical features.

RESPONSE: a. This adjustment is contrary to the TRA's Interim Order that established the switch terminations as 70.38% IDLC and 29.62% for analog terminations. Notwithstanding this inconsistency, the change to 100% IDLC would impact the loop and port costs.

The compliance studies BellSouth produced considered 87.94% of those loops served by digital loop carrier are IDLC and the remaining 12.06% are on universal systems. This is consistent with the TRA's switch termination distribution. (See BellSouth's response to Part 2, Item No. 3.). If BellSouth were to implement AT&T's proposal, the Loop Model would have to be adjusted to reflect 100% IDLC. This would in turn require that SCIS/MO inputs be adjusted such that the consistency between the types of loops deployed and the way they are terminated in the switch is maintained. Also, since AT&T's proposal only dictates the way loops on digital loop carrier are served, BellSouth would go back to its original distribution of copper (i.e., loops not served by digital loop carrier) and loops served by digital loop carrier. Thus, 56% of the loops would be on digital loop carrier and would be integrated. This would translate to 56% of the switch terminations being integrated (IDLC).

RESPONSE: (Continued)

b. This would have no impact. As directed by the TRA, BellSouth reduced the drop lengths to 100 feet in order to determine the investment for drops.. As explained in BellSouth's reply comments, BellSouth pays a fixed labor rate for the burial and installation of drops up to 500 feet.

c. BellSouth is not sure what this question is asking. However, providing loop-port combinations would not affect the recurring costs of either loops or ports in light of the TRA's previous adjustments, although nonrecurring costs would be affected.

d. One would have to simply add the individual feature costs to the ports. BellSouth presented the feature costs individually, but this does not stop AT&T from grouping them together as one cost. The TRA found "BellSouth should include feature-specific costs (e.g., the costs of specialized hardware, right-to-use fees, and the cost of administrative provisioning time associated with vertical features) in its TELRIC estimates." The TRA has recognized the existence of costs beyond simple "switch software", and BellSouth has identified these costs on an individual feature basis. Just because BellSouth chose to calculate the cost of individual features, does not stop AT&T from purchasing a port with features.

RESPONSE: (Continued)

BellSouth complied fully with the TRA's order with respect to switching (Issue 14) by: (1) using the marginal mode of SCIS/MO; (2) recalculating switched usage charges per MOU using the formula stated in the TRA's Order; (3) changing the vendor discounts; and (4) assuming 70.38% IDLC and 29.62% analog terminations.

In addition, the Authority requests that BellSouth provide the following:

REQUEST: Explain precisely Attachment 2, F.1.1 OSS Electronic Interface Cost, per UNE; especially the derivation of the 2.5 Average Number of UNEs Per Order and the 2.9 Churn Factor.

RESPONSE: The TRA ordered that OSS costs be recovered over UNEs. The costs naturally occur on a one-time, per service order basis. Thus, BellSouth had to first convert the one-time cost to a monthly cost. This was accomplished by using the TRA's approved Cost of Money (9.93%) and recovery period (7 years). This resulted in a monthly cost per order of $0.16. BellSouth personnel familiar with the orders CLECs have been submitting provided the average number of UNEs per service order, 2.5. The churn factor was obtained from Network Carrier Services personnel that are familiar with the volume and types of orders processed. The churn factor reflects the fact that more than one order will be placed for that UNE in the 7-year recovery period.

In addition, the Authority requests that BellSouth provide the following:

REQUEST: Do BellSouth retail operations use or benefit from any OSS systems? If so, how? If no, explain why.

RESPONSE: BellSouth's retail operations do not utilize the OSS systems recovered through these costs. The Electronic Interface costs reflect only the incremental cost BellSouth has incurred to develop, implement, and maintain the interfaces CLECs use to access BellSouth's legacy systems (OSSs). These CLEC interfaces are not used in the operation of BellSouth's retail business. Costs related to the legacy systems were included only to the extent that they were directly attributable to the implementation of the CLEC interfaces.

In addition, the Authority requests that BellSouth provide the following:

REQUEST: Clarify the derivation of the distribution of DLC provided in its footnote 1 in the Reply Comments to explain the split of 21.28% UDLC and 44% Copper, specifically explain why the sum of universal DLC and Copper does not add to 100%.

RESPONSE: The reason that the sum does not equal 100% is that 34.72% of the loops are on integrated digital loop carrier (IDLC). This computation is:

100% - (44%+21.28%) = 34.72%

It may be best to outline the process BellSouth went through in order to comply with the TRA's interim order. BellSouth's original Loop Model output generated the following distribution of loops:

Digital Loop Carrier (56%)
Integrated Digital Loop Carrier (IDLC) – 34.72%
Universal Digital Loop Carrier (UDLC) – 21.28%

Not on Digital Loop Carrier (44%)
Copper – 44%

These figures were derived from the sample of loops in Tennessee. That is, digital loop carrier did not serve 44% of the redesigned loops. The remaining 56% of the loops (i.e., those served by DLC) were then split between integrated and universal systems based on deployment projections received from BellSouth Network Department personnel.

RESPONSE: (Continued)

The TRA's Interim Order ruled that the mix of IDLC switch terminations should be 70.38% and the number of switch analog terminations should be 29.62%. Obviously, the switch terminations are directly related to the way the loops are provisioned. IDLC loops equal IDLC switch terminations. UDLC plus Copper loops equal analog switch terminations. Thus, BellSouth reflected 70.38% of the loops being served by IDLC. In order to develop the split of the 29.62% analog between UDLC and Copper loops, the relative proportions from the Loop Model were used. 61.28% of the loops were on either Copper (44%) or UDLC (21.28%). Thus, the distributions are:

Copper – 44% / 61.28% = 19.96%
UDLC – 21.28% / 61.28% = 9.66%

The Loop Model requires the distribution between IDLC and UDLC carrier systems. This calculation was made as follows:

Total Digital Loop Carrier = 70.38% + 9.66% = 80.04%
IDLC = 70.38% / 80.04% = 87.94%
UDLC = 9.66% / 80.04% = 12.06%

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
Unbundled local loop				
2-Wire Analog Voice Grade Loop (2-WAVGL)				
2-WAVGL - Service level 1	Per month		*$17.00	
2-WAVGL - Service level 2	Per month		*$21.34	
2-WAVGL-SL1- Service Level 1 - Manual Order Coordination				
2-WAVGL-SL1-Order Coordination for Specified Conversion Time				
2-WAVGL-SL2-Order Coordination for Specified Conversion Time				
Sub-Loop 2-wire analog				
Loop feeder per 2-WVGL	Per month		*13.51	
Loop distribution - per 2-WAVGL	Per month		*$11.41	
Loop concentration- Channelization System (Outside C.O.)	Per month		*$374.02	
Loop concentration-Remote terminal Cabinet (Outside C.O.)	Per month		ICB	
Loop concentration-Remote Channel Interface -2-WAVGL	Per month		*$0.9	
NID per 2-WAVGL	Per month		*$1.31	
LC-Channelization System - Incremental Cost-Manual Svc Order vs Electronic				
Sub-Loop Feeder-Order Coordination for Specified Conversion Time				
Sub-Loop Distribution-Order Coordination for Specified Conversion Time				
Loop Channelization and CO Interface (Inside CO)				
Loop Channelization System - DLC	Per month		*$349.86	
CO Channel Interface - 2-Wire Voice Grade	Per month		*$1.3704	
LC-Channelization System-Incremental Cost-Manual Svc Order vs. Electronic				
4-Wire Analog Voice Grade Loop				
4-wire analog voice grade loop	Per month		*$31.70	
NID per 4-wire analog voice grade loop	Per month		*$1.45	
4-WAVGL-Order Coordination for Specified Conversion Time				
2-Wire ISDN Digital Grade Loop				
2-wire ISDN Digital Grade Loop	Per month		*$28.63	
NID per 2-Wire ISDN Digital Grade Loop	Per month		*$1.31	
2-Wire ISDN Digital Grade Loop-Order Coordination for Specified Conversion Time				
2-wire asymmetrical digital subscriber line (ADSL) compatible loop				
2-wire ADSL compatible loop	Per month		*$17.80	
NID per 2-wire ADSL loop	Per month		*$1.31	
2-Wire ADSL Digital Grade Loop-Order Coordination for Specified Conversion Time				
2-wire high bit rate DSL compatible loop				
2-wire HDSL compatible loop	Per month		*$13.95	
NID per 2-wire HDSL loop	Per month		*$1.31	

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
2-Wire HDSL Loop-Order Coordination for Specified Conversion Time				
4-wire HDSL compatible loop				
4-wire HDSL compatible loop	Per month		*$17.82	
NID per 4-wire HDSL loop	Per month		*$1.45	
4-Wire HDSL Loop-Order Coordination for Specified Conversion Time				
4-wire DS1 Digital Loop				
4-wire DS1 Digital Loop	Per month		*$74.17	
4-Wire DS1 Loop - Incremental Cost - Manual Svc Order vs. Electronic				
4-Wire DS1 Loop-Order Coordination for Specified Conversion Time				
4-wire 56 or 64 KBPS Digital Grade Loop				
4-wire 56 or 64 KBPS Digital Grade Loop	Per month		*$39.93	
NID per 4-wire 56 or 64 KBPS Digital Grade Loop	Per month		*$1.45	
4-Wire 56/64 Kbps Dig. GL-Order Coordination for Specified Conversion Time				
Unbundled Loops-Incremental Cost-Manual Svc vs Electronic				
Unbundled 2-Wire Loops-Incremental Cost-Manual Svc vs Electronic				
Unbundled 4-Wire Loops (excluding DS1)-Incremental Cost-Manual vs Electronic				
NID per 2-Wire Loops- Manual Svc Order vs Electronic				
NID per 4-Wire Loops -Manual Svc Order vs Electronic				
UNBUNDLED LOCAL EXCHANGE AND FEATURES				
Exchange Ports (EP)				
Exchange ports - 2-wire Analog Line Port (Res., Bus.)	Per month		$1.70	
Exchange ports - 4-wire Analog Voice Grade Port	Per month		$8.08	
Exchange ports - 2-wire DID Port	Per month		$8.78	
Exchange ports - 4-wire DID Port	Per month		$35.55	
Exchange ports - 2-wire ISDN Port	Per month		$16.07	
Exchange ports - 4-wire ISDN DS1 Port	Per month		$74.85	
Exchange ports - 2-wire Analog Line Port (PBX)	Per month		$1.60	
Exchange ports - Coin Port	Per month		$1.92	
EP-2-Wire Analog Line Port (Res., Bus.)-Incremental Cost-Manual vs Electronic				
EP-4-WAVG Port-Incremental Cost-Manual Svc Order vs Electronic				
EP-2-Wire DID Port-Incremental Cost-Manual Svc Order vs Electronic				
EP-4-Wire DID Port-Incremental Cost-Manual Svc Order vs Electronic				
EP-2-Wire ISDN Port-Incremental Cost-Manual Svc Order vs Electronic				
EP-4-Wire ISDN DS1 Port-Incremental Cost-Manual Svc Order vs Electronic				
EP-2-Wire Analog Line Port (PBX)-Incremental Cost-Manual Svc Order vs Electronic				
Exchange ports - Coin Port-Incremental Cost-Manual Svc Order vs Electronic				

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
Features				
Three-way Calling	Per month		$0.2264	
Cust. Changeable Speed Calling	Per month		$0.0567	
Call waiting	Per month		$0.0478	
Remote Activation of Call Forwarding	Per month		$0.1957	
Cancel call Waiting	Per month		$0.0063	
Automatic callback	Per month		$0.0881	
Automatic recall	Per month		$0.0833	
Calling number delivery	Per month		$0.0536	
Calling number delivery blocking	Per month		$0.0553	
Customer originated trace	Per month		$0.0359	
Selective call rejection	Per month		$0.0173	
Selective call forwarding	Per month		$0.0524	
Selective call acceptance	Per month		$0.0475	
Multiline hunt service	Per month		$0.0668	
Call forwarding variable	Per month		$0.0507	
Call forwarding busy line	Per month		$0.0464	
Call forwarding Don't answer all calls	Per month		$0.0464	
Remote call forwarding	Per month		$0.7430	
Call transfer	Per month		$0.0654	
Call hold	Per month		$0.1153	
Toll restricted service	Per month		$0.0507	
Msg. Waiting Indic. - stutter Dial tone	Per month		$0.0136	
Anonymous call rejection	Per month		$0.3144	
Shared call appearances of a DN	Per month		$0.0913	
Multiple call appearances	Per month		$0.0234	
ISDN bridged call exclusion	Per month		$0.0020	
Call by call access	Per month		$3.55	
Privacy release	Per month		$0.0049	
Multi appearance directory number calls	Per month		$0.0314	
Make set busy	Per month		$0.0049	
Teen service (Res. Dist. Alerting Svc.)	Per month		$0.1534	
Code restriction and diversion	Per month		$0.0493	
Call park	Per month		$0.0500	
Automatic line	Per month		$0.1128	
ISDN message waiting indication-lamp	Per month		$0.0039	
ISDN Feature Function Buttons				
Subsequent Ordering Charge - Electronic				
Subsequent Ordering Charge -Incremental Cost- Manual Svc Order vs Electronic				

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
UNBUNDLED SWITCHING AND LOCAL INTERCONNECTION				
Local Switching				
End office switching function	Per MOU		$0.0008041	
End Office Interoffice Trunk Port - Shared, per MOU				
Tandem Switching				
Tandem switching function	Per MOU		$0.0009778	
Tandem Interoffice Trunk Port - Shared, Per MOU				
UNBUNDLED TRANSPORT AND LOCAL INTERCONNECTION				
Common Transport				
Common transport - per mile, per MOU	Per mile		$0.00000640	
	Per MOU			
Common Transport - Facilities Termination per MOU			$0.00038710	
Interoffice Transport - Dedicated - Voice Grade				
Interoffice Transport - Dedicated - Voice Grade	Per mile			
Interoffice Transport-Dedicated - 2-wire voice grade-per mile	Per mile		$0.0174	
Interoffice Transport - Dedicated - 2- Wire Voice Grade - Facility Termination			$18.58	
Interoffice Transport-Voice Grade-Incremental Cost-Manual Svc Order vs Electronic				
Interoffice Transport - Dedicated-DS0-56/64 KBPS				
Interoffice Transport - Dedicated - DS0 - per Mile	Per mile		$0.0174	
Interoffice Transport - Dedicated-DS0-Facility Termination	Per month		$17.98	
Interoffice Transport-DS0-Incremental Cost-Manual Svc Order vs Electronic				
Interoffice Transport - Dedicated - DS1				
Interoffice Transport - Dedicated - DS1 - per Mile	Per mile		$0.3562	
Interoffice Transport-Dedicated-DS1-Facility Termination	Per month		$77.86	
Interoffice Transport-DS1-Incremental Cost-Manual Svc Order vs Electronic				
Local Channel (LC) - Dedicated				
Local Channel - Dedicated - 2-wire voice grade	Per month		$19.24	
Local Channel - Dedicated - 4-wire voice grade	Per month		$20.37	
Local Channel - Dedicated - DS1	Per month		$40.80	
LC-Dedicated-2-Wire Voice Grade-Incremental Cost-Manual Sc Order vs Electronic				
LC-Dedicated-4-Wire Voice Grade-Incremental Cost-Manual Sc Order vs Electronic				
LC-Dedicated-DS1-Incremental Cost-Manual Svc Order vs Electronic				
Signaling Network, Data Bases, & Svc. Mngt. Sys.				
800 Access Ten Digit Screening				
800 Access Ten digit screening (800 ATDS), per call	Per call		$0.0005192	

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
800 Access Ten digit screening, Reservation Charge per 800 Number Reserved				
800 Access Ten digit screening, Per 800 # Established W/O POTS Translations				
800 Access Ten digit screening, Per 800 # Established With POTS Translations				
800 Access Ten digit screening, Customized Area of Service Per 800 Number				
800 ATDS, Multiple InterLATA CXR Routing Per CXR Requested Per 800 #				
800 Access Ten digit screening, Change Charge Per Request				
800 Access Ten digit screening, Call Handling and Destination Features				
800 ATDS, Resrv Chrg Per 800 # Reserved-Incrm Cost-Manual Svc Order vs Electr				
800 ATDS, Per 800 # Est'd w/o POTS Transl-Incrm Cost-Manual Svc Order vs Electr				
800 ATDS, Per 800 # Est'd w/ POTS Transl-Incrm Cost-Manual Svc Order vs Electr				
800 ATDS, Chng Chrg/Request-Incrm Cost-Manual Svc Order vs Electr				
Line Information Data Base Access (LIDB)				
LIDB Common Transport per Query	Per query		$0.0000354	
LIDB Validation per Query	Per query		$0.0117403	
LIDB Originating Point Code Establishment or Change				
LIDB-Incremental Cost-Manual Svc Order vs Electronic				
CCS7 Signaling Transport				
CCS7 Signaling Connection, per 56kbps Facility	See col.1		$17.84	
CCS7 Signaling Termination, per STP Port	Id.		$138.41	
CCS7 Signaling Usage, per call setup message	Id.		$0.0000373	
CCS7 Signaling Usage, per TCAP Message	Id.		$0.0000916	
CCS7 Signaling Usage Surrogate, per 56kbps facility, per LATA per month	Id.		$352.30	
CCS7-Incremental Cost-Manual Svc Order vs Electronic				
OPERATIONAL SUPPORT SYSTEMS				
Operational Support Systems				
OSS Electronic Interface	Per month		$7.07	
OSS OLEC Daily Usage File: Recording, per Message	Per message		$0.0000044	
OSS OLEC Daily Usage File: Message distribution, per message	Per message		$0.0027366	
OSS OLEC Daily Usage File: Message Distribution, per magnetic tape provisioned	See col.1		$52.75	
OSS OLEC Daily Usage File: Data Transmission (Connect:Direct), per message	Per message		$0.0000339	
OPERATOR SERVICES AND DIRECTORY ASSISTANCE				
Operator Call Processing (OCP)				
OCP - Op. Provided cost per min - using BST LIDB	Per min.		$1.08	
OCP - Op. Provided cost per min - using foreign LIDB	Per min.		$1.13	
OCP - Fully automated cost per call -using BST LIDB	Per call		$0.1010353	
OCP-Fully automated cost per call -using foreign LIDB	Per call		$0.1228180	
Loading Expense Per Announcement For Branded Announcement				

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
Recording Expense Per Announcement For Branded Announcement				
Inward Operator Services (IOS)				
IOS - Verification, per minute	Per minute		$1.03	
IOS - Verification and Emergency Interrupt, per minute	Per minute		$1.03	
Directory assistance (DA) call completion access service (DACC)				
DACC, per call attempt	Per call attempt		$0.0364771	
Number Svcs Intercept Access Service				
Number services intercept per query	Per query		$0.0177930	
Directory Assistance Access Service				
DA Access Service Calls, cost per call	Per call		$0.2286787	
Loading Expense Per Announcement For Branded Announcement				
Recording Expense Per Announcement For Branded Announcement				
Directory Transport (DT)				
DT - Local Channel DS1	Per month		$40.80	
DT - DS1 Level Interoffice per mile	Per mile		$0.3562	
DT - DS1 Level Interoffice per facility termination	Per month		$77.86	
Switched common transport per DA access service per call	Per call		$0.0002710	
Switched common transport per DA access service per call per mile	Per call / mile		$0.0000165	
Access Tandem Switching Per DA Access service per call	Per call		$0.0001875	
DT-DA Interconnection Per DA Service Call				
DT-Installation NRC, Per Trunk or Signaling Connection				
DT Local Channel DS1-Incremental Cost-Manual Svc Order vs Electronic				
DT Interoffice DS1-Incremental Cost-Manual Svc Order vs Electronic				
Directory Assistance Data Base Service (DADS)				
DADS Cost per Listing	Per listing		$0.0485	
DADS, Monthly Recurring Cost	Per month		$104.13	
Direct Access to Directory Assistance				
Direct access to DA Service, per month	Per month		$5,729.00	
Direct access to DA Service, per query	Per query		$0.0493769	
Direct Access to DA Service, Service Establishment Charge				
Selective Routing (InterimSolution Line Class Codes)				
Selective Routing Per Unique Line Class Code Per Request Per Switch				
Selective Routing-Incremental Cost-Manual Svc Order vs Electronic				

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
COLLOCATION				
Physical Collocation (Phys. Coll.)				
Physical Collocation - Application Cost				
Physical Collocation (Phys. Coll.)- space preparation	See col. 1		ICB	
Phys. Coll. - Space construction cost per first 100 sq. ft.	See col. 1		$138.54	
Phys. Coll. - Space construction cost per add'l 50 sq. ft.	Per add'l 50 sq. ft.		$16.07	
Phys. Coll. - Cable Installation Cost Per Cable				
Phys. Coll. - Floor space, per sq. ft	See col. 1		$3.91	
Phys. Coll. - Cable support structure, per entrance cable	Per entrance cable		$20.43	
Phys. Coll. - power, per ampere	/ampere		$6.79	
Phys. Coll. - 2-wire cross connects	?		$0.7905	
Phys. Coll. - 4-wire cross connects	id		$1.0158	
Phys. Coll. - DS1 cross connects	id		$2.66	
Phys. Coll. - DS3 cross connects	id		$42.00	
Phys. Coll. - 2-wire POT Bay	id		$0.0921	
Phys. Coll. - 4-wire POT Bay	id		$0.1843	
Phys. Coll. - DS1 POT Bay	id		$0.7606	
Phys. Coll. - DS3 POT Bay	id		$4.77	
Phys. Coll. - Security Escort - Basic, Per Half Hour	per 1/2 Hour			
Phys. Coll. - Security Escort - Overtime, Per Half Hour	per 1/2 Hour			
Phys. Coll. - Security Escort - Premium, Per Half Hour	per 1/2 Hour			
Phys. Coll.-2-Wire Cross Connects-Incrm. Cost - Manual Svc Order vs Electronic				
Phys. Coll.-4-Wire Cross Connects-Incrm. Cost - Manual Svc Order vs Electronic				
Phys. Coll. -DS1/DS3 Cross Connects-Incrm. Cost-Manual Svc Order vs Electronic				
Virtual Collocation (VC)				
VC- Application Cost				
VC- Cable Installation Cost Per Cable				
VC - Floor Space per sq. ft.	Per sq. ft.		$3.91	
VC - Floor space power, per ampere	/ampere		$6.79	
VC - Cable support structure, per entrance cable	See col. 1		$17.87	
VC - 2-wire cross connects	?		$0.5688	
VC - 4-wire cross connects	id		$0.5723	
VC - DS1 cross connects	id		$1.3190	
VC - DS3 cross connects	id		$12.32	
VC - Security Escort - Basic, Per Half Hour	per 1/2 Hour			
VC -Security Escort - Overtime, Per Half Hour	per 1/2 Hour			
VC -Security Escort - Premium, Per Half Hour	per 1/2 Hour			
VC-2-Wire Cross Connects-Incrm. Cost - Manual Svc Order vs Electronic				
VC-4-Wire Cross Connects-Incrm. Cost - Manual Svc Order vs Electronic				

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
VC-DS1/DS3 Cross Connects-Incrm. Cost-Manual Svc Order vs Electronic				
SERVICE PROVIDER NUMBER PORTABILITY				
Service Provider Number Portability - RCF				
SPNP - RCF, Per number ported	See col. 1		$1.24	
SPNP - RCF, Per additional path	See col. 1		$0.1514	
SPNP - RCF, Per Service Order, Per Location				
Service Provider Number Portability - DID				
SPNP - DID, Per Number Ported, Residence				
SPNP - DID, Per Number Ported, Business				
SPNP - DID, Per Service Order, Per Location				
SPNP - DID, per trunk termination, initial	See col. 1		$7.86	
SPNP - DID, per trunk termination, subsequent	See col. 1		$7.69	
SPNP - Manual Svc Order vs Electronic				
SPNP - Incremental Cost - Manual Svc Order vs Electronic				
Service Provider Number Portability (SPNP-RIPH)				
SPNP-RIPH, Functionality, Per Central Office				
SPNP-RIPH, Functionality, Per Rearrangement				
Service Provider Number Portability RI-PH (SPNP-RI-PH)				
SPNP - RI-PH, per number ported	See col. 1		$0.8677	
SPNP - RI-PH, Per Service Order, Per Location				
OTHER				
Dark Fiber				
Dark fiber, per 4 fiber strands, per route mile or fraction thereof	See col. 1		$53.23	
Access to Poles, Ducts, Conduits and Rights of Way				
Access to Poles Per Pole, Per Foot, Per Year	See Col. 1		$20.54	
Access to Conduits, Per Foot, Per Year	id		$0.5370432	
Access to Innerduct, Per Foot, Per Year	id		$0.4477645	
ADVANCED INTELLIGENT NETWORK (AIN) SERVICES				
BellSouth AIN SMS Access Service				
AIN SMS Access Service-Service Establishment, Per State, Initial Setup				

*See Attachment 2

Table 1. Recurring Costs for UNEs: TELRIC and HAI Compared

Network Elements	Unit	HAI Model	TELRIC Model	Cost Difference (TELRIC-HAI)
AIN SMS Access Service - Port Connection - Dial/Shared Access				
AIN SMS Access Service - Port Connection - ISDN Access				
AIN SMS Access Service - User Identification Codes - Per User ID Code				
AIN SMS Access Service - Security Card, Per User ID Code, Initial or Replacement				
AIN SMS Access Svc - Storage, per unit (100 kilobytes)	/100 KB		$0.0024	
AIN SMS Access Service - Session, per minute	Per min.		$0.0820123	
AIN SMS Access Svc-Company performed session, per minute	Per min.		$2.27	
BellSouth AIN Toolkit Service (AIN TS)				
AIN TS - Service Establishment Charge, Per State, Initial Setup				
AIN TS - Training Session, Per Customer				
AIN TS - Trigger Access Charge, Per Trigger, Per DN, Term. Attempt				
AIN TS - Trigger Access Charge, Per Trigger, per DN, Off Hook Delay				
AIN TS - Trigger Access Charge, Per Trigger, per DN, Off-Hook Immediate				
AIN TS - Trigger Access Charge, Per Trigger, per DN, 10-Digit PODP				
AIN TS - Trigger Access Charge, Per Trigger, per DN, CDP				
AIN TS - Trigger Access Charge, Per Trigger, per DN, Feature Code				
AIN TS - Query Charge, Per Query	Per query		$0.0211882	
AIN TS - Type 1 Node Charge, per AIN Toolkit subscription, per Node, per query	See col. 1		$0.0054774	
AIN TS - SCP Storage charge, per SMS access account, per 100 kilobytes	See col. 1		$1.50	
AIN TS - Monthly report - per AIN TS Subscription	See col. 1		$17.43	
AIN TS - Special study - per AIN TS Subscription	See col. 1		$0.1321116	
AIN TS - Call event report - per AIN TS Subscription	See col. 1		$17.35	
AIN TS - Call event special study - per AIN TS Subscription	See col. 1		$0.0511435	

*See Attachment 2

(A) Cost Element	(B) Network Elements	(C) AT&T HAI Model Cost	(D) BellSouth TELRIC Model Compliance Filing Cost	(E) % Difference from BellSouth A.1.1 Cost (D-14.92)/14.92	(F) Revised BellSouth Cost (1+E)x17.00
A.0	**Unbundled local loop**				
A.1	**2-Wire Analog Voice Grade Loop (2-WAVGL)**				
A.1.1	2-WAVGL - Service level 1	$17.00	$14.92	0.00%	$17.00
A.1.2	2-WAVGL - Service level 2		$18.73	25.51%	$21.34
A.1.3	2-WAVGL-SL1- Service Level 1 - Manual Order Coordination				
A.1.4	2-WAVGL-SL1-Order Coordination for Specified Conversion Time				
A.1.5	2-WAVGL-SL2-Order Coordination for Specified Conversion Time				
A.2	**Sub-Loop 2-wire analog**				
A.2.1	Loop feeder per 2-WVGL		$11.86	-20.52%	$13.51
A.2.2	Loop distribution - per 2-WAVGL		$10.02	-32.87%	$11.41
A.2.3	Loop concentration- Channelization System (Outside C.O.)		$328.28	2100.14%	$374.02
A.2.4	Loop concentration-Remote terminal Cabinet (Outside C.O.)		ICB	na	ICB
A.2.5	Loop concentration-Remote Channel Interface -2-WAVGL		$0.8766	-94.13%	$0.9987
A.2.6	NID per 2-WAVGL		$1.15	-92.29%	$1.31
A.2.7	LC-Channelization System - Incremental Cost-Manual Svc Order vs Electronic				
A.2.8	Sub-Loop Feeder-Order Coordination for Specified Conversion Time				
A.2.9	Sub-Loop Distribution-Order Coordination for Specified Conversion Time				
A.3	**Loop Channelization and CO Interface (Inside CO)**				
A.3.1	Loop Channelization System - DLC		$307.07	1957.99%	$349.86
A.3.2	CO Channel Interface - 2-Wire Voice Grade		$1.2028	-91.94%	$1.3704
A.3.3	LC-Channelization System-Incremental Cost-Manual Svc Order vs. Electronic				
A.4	**4-Wire Analog Voice Grade Loop**				
A.4.1	4-wire analog voice grade loop		$27.82	86.47%	$31.70
A.4.2	NID per 4-wire analog voice grade loop		$1.27	-91.49%	$1.45
A.4.3	4-WAVGL-Order Coordination for Specified Conversion Time				
A.5	**2-Wire ISDN Digital Grade Loop**				
A.5.1	2-wire ISDN Digital Grade Loop		$25.13	68.43%	$28.63
A.5.2	NID per 2-Wire ISDN Digital Grade Loop		$1.15	-92.29%	$1.31
A.5.3	2-Wire ISDN Digital Grade Loop-Order Coordination for Specified Conversion Time				
A.6	**2-wire asymmetrical digital subscriber line (ADSL) compatible loop**				
A.6.1	2-wire ADSL compatible loop		$15.63	4.72%	$17.80
A.6.2	NID per 2-wire ADSL loop		$1.15	-92.29%	$1.31
A.6.3	2-Wire ADSL Digital Grade Loop-Order Coordination for Specified Conversion Time				

A.7	**2-wire high bit rate DSL compatible loop**			
A.7.1	2-wire HDSL compatible loop	$12.25	-17.93%	$13.95
A.7.2	NID per 2-wire HDSL loop	$1.15	-92.29%	$1.31
A.7.3	2-Wire HDSL Loop-Order Coordination for Specified Conversion Time			
A.8	**4-wire HDSL compatible loop**			
A.8.1	4-wire HDSL compatible loop	$15.64	4.81%	$17.82
A.8.2	NID per 4-wire HDSL loop	$1.27	-91.49%	$1.45
A.8.3	4-Wire HDSL Loop-Order Coordination for Specified Conversion Time			
A.9	**4-wire DS1 Digital Loop**			
A.9.1	4-wire DS1 Digital Loop	$65.10	336.30%	$74.17
A.9.2	4-Wire DS1 Loop - Incremental Cost - Manual Svc Order vs. Electronic			
A.9.3	4-Wire DS1 Loop-Order Coordination for Specified Conversion Time			
A.10	**4-wire 56 or 64 KBPS Digital Grade Loop**			
A.10.1	4-wire 56 or 64 KBPS Digital Grade Loop	$35.05	134.90%	$39.93
A.10.2	NID per 4-wire 56 or 64 KBPS Digital Grade Loop	$1.27	-91.49%	$1.45
A.10.3	4-Wire 56/64 Kbps Dig. GL-Order Coordination for Specified Conversion Time			
A.11	Unbundled Loops-Incremental Cost-Manual Svc vs Electronic			
A.11.1	Unbundled 2-Wire Loops-Incremental Cost-Manual Svc vs Electronic			
A.11.2	Unbundled 4-Wire Loops (excluding DS1)-Incremental Cost-Manual vs Electronic			
A.11.3	NID per 2-Wire Loops- Manual Svc Order vs Electronic			
A.11.4	NID per 4-Wire Loops -Manual Svc Order vs Electronic			

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2000, a copy of the foregoing document was served on the parties of record as indicated:

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