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Missouri Public
Service Commission

Exhibit No.:

Issue(s): Article VIIA: Costing/Pricing,
Non-Recurring Rates

Witness: Ted M. Hankins

Type of Exhibit: Rebuttal Testimony

Sponsoring Party: CenturyTel of Missouri,
LLC and Spectra Communications Group,
LLC d/b/a CenturyTel

Case No.: TO-2006-0299

Date Testimony Prepared: April 6, 2006

REBUTTAL TESTIMONY

OF

TED M. HANKINS

ON BEHALF OF

**CENTURYTEL OF MISSOURI, LLC AND SPECTRA
COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL**

CASE NO. TO-2006-0299

Exhibit No. G
Case No(s) TO-2006-0299
Date 4-12-06 Rptr KE

OF THE STATE OF MISSOURI

PETITION OF SOCKET TELECOM, LLC)
FOR COMPULSORY ARBITRATION OF)
INTERCONNECTION AGREEMENTS)
WITH CENTURYTEL OF MISSOURI, LLC)
AND SPECTRA COMMUNICATIONS, LLC)
PURSUANT TO SECTION 252(b)(1) OF)
THE TELECOMMUNICATIONS ACT OF)
1996)

CASE NO. TO-2006-0299

STATE OF LOUISIANA

PARISH OF OUACHITA

AFFIDAVIT OF TED M. HANKINS

I, Ted M. Hankins, of lawful age and being duly sworn, state:

1. My name is Ted Hankins. I am presently Director – Economic Analysis for CenturyTel Service Group, LLC.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.


Ted M Hankins

Subscribed and sworn to before this 5th day of April, 2006.



My Commission expires: AT DEATH


Notary Public

Gary Maxwell Cox
Louisiana Bar Roll No. 27419
Notary Public, Ouachita Parish, Louisiana
My Commission is for Life

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1 **REBUTTAL TESTIMONY OF**
2 **TED M. HANKINS**

3 **ON BEHALF OF CENTURYTEL OF MISSOURI, LLC AND SPECTRA**
4 **COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL**

5 **Q. PLEASE STATE YOUR NAME.**

6 **A. Ted M. Hankins.**

7 **Q. ARE YOU THE SAME TED M. HANKINS WHO FILED DIRECT TESTIMONY IN**
8 **THE PROCEEDING?**

9 **A. Yes.**

10 **I.**
11 **PURPOSE OF TESTIMONY**

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A. In my direct testimony, I explained that Socket's proposal to borrow the SBC non-recurring**
14 **charges (NRCs) for CenturyTel is inappropriate and that, instead, the Commission should**
15 **either adopt (a) CenturyTel's proposed GTE-based UNE NRCs or (b) if CenturyTel must**
16 **provide electronic access to OSS as Socket demands, CenturyTel's proposed alternate NRCs,**
17 **which allow it to recover the cost of implementing an electronic interface to CenturyTel's**
18 **OSS, as Socket has demanded in its proposed Article XIII. In my rebuttal testimony, I will**
19 **address the same issues, explaining why Socket's direct testimony fails to justify its NRC**
20 **proposal and why the Commission should ultimately determine that CenturyTel's proposed**
21 **NRCs and additives or surcharges are reasonable, forward-looking, and appropriate.**

1 **Q. DO ANY NONRECURRING RATES REMAIN IN DISPUTE?**

2 A. Yes. While the parties have agreed to most of the recurring rates, as Socket's Attachment to
3 Article VII Appendix reveals, many of the NRCs remain in dispute. Whereas Socket has
4 proposed SBC-based NRCs, CenturyTel agrees to abide by its GTE-based UNE NRCs
5 contained in existing Commission-approved Interconnection Agreements (ICAs) between
6 CenturyTel and other CLECs, unless the Commission grants Socket's demand for electronic
7 access to OSS. As I explained in my direct testimony, CenturyTel has conducted a cost study
8 to develop proposed alternative rates, additives, or surcharges to apply in the event it is
9 required to implement the electronic access to OSS that Socket is demanding. The
10 Commission should either adopt CenturyTel's proposed GTE-based UNE NRCs or, if it
11 compels CenturyTel to develop and implement the electronic access to OSS Socket demands,
12 adopt CenturyTel's proposed alternative UNE NRCs, additives, or surcharges that are set
13 forth in attached Schedule TMH-Reb-1.

14 **II.**

15 **SOCKET FAILS TO JUSTIFY ITS PROPOSED NRCS**

16 **Q. DOES SOCKET PROPOSE NRCS IN ITS DIRECT TESTIMONY?**

17 A. In a manner of speaking, yes. In his three pages of testimony on NRCs, Mr. Turner fails to
18 specifically identify the rate elements at issue or the NRCs Socket proposes either in the body
19 of his testimony or in any schedules thereto. Instead, Mr. Turner comments that "Socket
20 Telecom felt an obligation to propose some NRC rates" (Turner Direct at 55:24-25) and that
21 it was, as I mentioned above and in direct, proposing "the nonrecurring charges that this
22 Commission established in the SBC cost proceedings." (Turner Direct at 55:12-13)

1 **Q. DID SOCKET FILE ANY COST STUDIES SUPPORTING ITS PROPOSED NRCS?**

2 A. No, Socket did not file the SBC cost studies ostensibly supporting the NRCS Socket proposes
3 here or Mr. Turner's "restatements" of those cost studies, and did not present any study or
4 analysis of its own showing how it determined that the SBC NRCS it is proposing are
5 appropriate for CenturyTel. Socket should have provided such cost studies with its direct
6 testimony in this proceeding. Further, based on Mr. Turner's professed experience on these
7 matters, he should have been able to prepare cost studies or analyses relating to Socket's
8 proposal to adopt SBC's NRCS (and explaining how those NRCS would allow CenturyTel to
9 recover its costs given its level of demand vis-à-vis SBC). Failing to do so, Socket has
10 provided no evidence of costs or the appropriateness of its proposed rates.

11 **Q. DID SOCKET PRESENT ANY SUPPORT FOR ITS PROPOSED NONRECURRING**
12 **RATES?**

13 A. No. Mr. Turner merely states that he was a CLEC witness in the SBC cost proceeding, that
14 he "provided restatements" of "nonrecurring cost studies filed by SBC" in that proceeding,
15 and that he assumes the same underlying cost inputs should apply to CenturyTel. (Turner
16 Direct at 56-57) At no point, however, does he offer or submit his "restatements" of SBC's
17 cost studies here. Importantly, moreover, while Mr. Turner observes that there are four
18 critical components to evaluating non-recurring costs (tasks, probability of task occurrence,
19 task time, and labor rate), he effectively concedes that he did not examine any of those four
20 critical components with respect to CenturyTel. (Turner Direct at 57). Instead, he
21 comments—without support—that "there is a great deal of similarity in the tasks" and
22 assumes—again, without support—comparability of the other three components. (Turner

1 Direct at 56-57) That is not sound cost methodology and certainly does not justify imposing
2 SBC-based NRCs on CenturyTel. Socket did not present any sound analysis supporting its
3 proposed NRCs in Mr. Turner's direct testimony.

4 **Q. SOCKET ASSERTS THAT THERE IS NO SIGNIFICANT DIFFERENCE**
5 **BETWEEN SBC AND CENTURYTEL. (TURNER DIRECT AT 57) DO YOU**
6 **AGREE?**

7 A. Absolutely not. CenturyTel witnesses Dr. Avera and Mr. Miller address this in detail in their
8 direct testimony and in rebuttal (Avera Direct at 4-13; Miller Direct at 76-79), demonstrating
9 at length why CenturyTel is fundamentally different and should be treated differently.
10 Moreover, and particularly relevant to NRCs, CenturyTel does not have the wholesale
11 demand that I believe SBC experiences.¹

12 **Q. ARE YOU SUGGESTING SOCKET HAS FAILED TO PROVE ITS CASE WITH**
13 **RESPECT TO NON-RECURRING RATES?**

14 A. Yes. As of the filing of Socket's direct testimony, there is no evidence in the record
15 supporting the proposed NRCs Socket advocates in this proceeding. Mr. Turner presents
16 generic assertions that SBC-based NRCs should be applied to CenturyTel, but fails to present
17 any reasoned analysis or underlying evidence proving the point. (Turner Direct at 55-57)
18 Without performing any specific studies comparing SBC and CenturyTel—or even
19 examining CenturyTel-specific facts, Mr. Turner merely relies on unsupported assumptions
20 as to tasks, probabilities, times, efficiencies and labor rates. (Turner Direct at 56-57) That is
21 not good enough. Reviewing Socket's direct testimony, I find no evidentiary or analytical

¹ Level of demand critically impacts NRCs because the costs are spread across demand such that greater demand will decrease per-task or per-order cost, while lower demand necessitates an increased rate per-task to recover the costs.

1 support for its proposed NRCs. Socket has failed to satisfy its burden of proof in its direct
2 case.

3 Q. SOCKET RECOMMENDS THAT THE COMMISSION UTILIZE THE SBC NRC
4 RATES WITHOUT BEING SUBJECT TO TRUE-UP. (TURNER DIRECT AT 57)
5 DO YOU AGREE?

6 A. Absolutely not. Socket has not put forth any evidence or analysis supporting the applicability
7 of SBC's NRCs to CenturyTel, much less that such NRCs should apply to CenturyTel on a
8 permanent basis.

9 Q. WHAT, THEN, SHOULD THE COMMISSION DO?

10 A. Since Socket has failed to present evidence in its direct testimony supporting its proposed
11 NRCs, the Commission should reject Socket's unsupported assertion that SBC's NRCs are
12 appropriate.

13 **III.**
14 **CENTURYTEL IS NOT BOUND TO ORIGINAL GTE NRCS IN PERPETUITY**

15 Q. PLEASE SUMMARIZE YOUR UNDERSTANDING OF SOCKET'S POSITION ON
16 THE ORIGINAL GTE/AT&T NRCS.

17 A. Certainly. Based on its filed direct testimony, it appears that Socket contends that
18 CenturyTel is bound in perpetuity to a zero rate for all NRCs beyond a \$3.92 order charge.
19 (Turner Direct at 55-56)

20 Q. DOES IT MAKE SENSE TO YOU TO BIND CENTURYTEL TO A ZERO RATE
21 NRC IN PERPETUITY?

22 A. Absolutely not, for several reasons. First, I find it a fundamentally improper reading of the
23 order to purport to bind CenturyTel in perpetuity to specific NRCs, much less to zero rates,
24 as Mr. Turner suggests. The point of the language upon which Mr. Turner relies was to

1 ensure a stable transition from GTE/Verizon to CenturyTel, not to bind CenturyTel forever to
2 those identical rates, terms, and conditions. Second, Socket errs in its characterization of the
3 \$3.92 NRC. It was not, as Socket suggests, a service order NRC ubiquitously applicable to
4 all service orders. Rather, it was a charge "to switch a customer from GTE to AT&T."
5 GTE/AT&T ICA, Attachment 14 at Appendix 1 item 1.1. And the intent all along was that
6 NRCs would be determined later:

7 With respect to all TBD prices, prior to AT&T ordering any such TBD item,
8 the Parties shall meet and confer to establish a price. If the Parties are unable
9 to reach agreement on a price for such item, an interim price shall be set for
10 such item that is equal to the price for the nearest analogous item for which a
11 price has been established (for example, if there is not an established price for
12 a non-recurring charge ("NRC") for a specific Network Element, the Parties
13 would use the NRC for the most analogous retail service for which there is an
14 established price); provided, however, that if the Parties are unable to agree
15 on what is the nearest analogous item for purposes of setting an interim price
16 or if there is no such analogous item, they will submit the dispute to
17 arbitration for purposes of establishing an interim price in accordance with
18 the procedures set forth in Attachment 1. Any interim prices so set shall be
19 subject to modification by any subsequent decision of the Commission. If an
20 interim cost or price is different from the rate subsequently established by the
21 Commission, the Parties shall reconcile any amounts paid during the interim
22 period such that the Parties will be made whole as if the rate(s) established by
23 the Commission had been in effect throughout the interim period. If an
24 interim price is different from the rate subsequently established by the
25 Commission, any underpayment shall be paid by AT&T to GTE, or any
26 overpayment refunded by GTE to AT&T, within forty-five (45) days after the
27 establishment of the price by the Commission.

28 GTE/AT&T ICA, Article 14 at Item 6. It doesn't look to me like the Commission or the
29 parties expected a single \$3.92 NRC to be the only NRC or that it govern all service orders
30 between the parties during the life of their agreement.

1 Third, Socket does not accurately characterize the regulatory history. To its
2 detriment, Socket only focuses on the Commission order in Docket TO-97-63. Subsequent
3 to that final order, the part overlooked by Socket, the Commission approved an
4 interconnection agreement between GTE and AT&T outlining new terms and conditions for
5 NRCs to be determined (other than the initial \$3.92 NRC). This GTE/AT&T interconnection
6 agreement was deemed appropriate for operations between Socket and CenturyTel of
7 Missouri, LLC in Docket CO-2005-0066. For CenturyTel of Missouri, therefore, the
8 Commission approved subsequent NRCs that Socket ignores in its direct case. And for
9 Spectra, of course, the Commission ruled that Socket may not impose the GTE/AT&T ICA
10 on it for Socket's operations because Spectra was not a party to that agreement. As of this
11 date, importantly, Spectra and Socket have not executed an ICA. So not only did the
12 Commission subsequently approve NRCs for CenturyTel of Missouri after the order on
13 which Socket focuses, but there is no current agreement with Spectra. Therefore, neither
14 CenturyTel of Missouri nor Spectra are bound for eternity to the original rates, terms and
15 conditions of the old GTE/AT&T agreement existing at the time CenturyTel of Missouri
16 acquired GTE/Verizon assets, and a zero rated NRC is not appropriate for either company,
17 given the regulatory history.

18 **Q. DO YOU AGREE WITH MR. TURNER'S STATEMENT THAT "UNDER**
19 **CENTURYTEL'S ACQUISITION COMMITMENTS; CENTURYTEL IS**
20 **ARGUABLY NOT ENTITLED TO ANY INCREASE IN RATES?" (TURNER**
21 **DIRECT AT 56)**

22 **A.** No, I do not agree. As I explain above, and as is discussed in the rebuttal testimony of Dr.
23 Avera and Mr. Buchan, it is unreasonable to assume that CenturyTel should be bound to

1 those NRCs with no opportunity to re-assess those rates. Indeed, Socket fails to recognize
2 that most of the NRCs were to be determined later (*i.e.*, there was never any intent that the
3 original order exhaustively include all NRCs) and fails to properly credit the regulatory
4 history (*i.e.*, subsequent CenturyTel of Missouri ICAs with NRCs and lack of any ICA
5 between Socket and Spectra). For Socket to assert that CenturyTel is precluded from ever
6 increasing NRCs above zero is both absurd on its face and belied by the facts.

7 **IV.**
8 **THE COMMISSION SHOULD ADOPT CENTURYTEL'S PROPOSED NRCS**

9 **Q. WHY IS CENTURYTEL PROPOSING ALTERNATE NRCS?**

10 A. Basically, CenturyTel is proposing alternate NRCs as a result of Socket's demands. As a
11 starting point, CenturyTel would be willing to continue operating under GTE-based UNE
12 NRCs contained in existing Commission-approved agreements that CenturyTel has with
13 other CLECs operating in the State of Missouri. (T. Hankins Direct at 5-7). Socket's
14 demands for electronic access to OSS, and CenturyTel's entitlement to cost recovery for
15 development and implementation of electronic access mechanisms, however, critically
16 impact the NRCs. As stated in my direct testimony, CenturyTel is proposing alternative
17 NRCs to recover a Missouri-based proportion of CenturyTel's costs necessary to develop and
18 implement an electronic access to OSS of the type Socket demands. (T. Hankins Direct at 9-
19 15) Given that the forecasted level of demand for UNEs is extremely low, the proposed
20 NRCs are necessarily higher.

1 **Q. DID YOU IDENTIFY THOSE PROPOSED ALTERNATIVE NRCS IN YOUR**
2 **DIRECT TESTIMONY?**

3 A. In my direct testimony I explained the methodology by which CenturyTel derived its
4 proposed alternative NRCS (T. Hankins Direct at 9-15), but I have discovered that I did not
5 accurately identify those alternative NRCS in the schedules to my direct testimony. Instead,
6 the figures included as "CTL Proposed Rates" on Schedules TMH-1, TMH-2, and TMH-3 do
7 not actually reflect the alternative NRCS, but are rather the "CTL Proposed Additive
8 Electronic Access to OSS," as reflected in attached Schedule TMH-Reb-1. Although the
9 methodology remains as I explained in my direct testimony (*i.e.*, start with Socket's proposed
10 NRCS and adjust to account for the Missouri-apportioned OSS cost), the proposed alternative
11 NRC changes to the sum of the Socket-proposed NRC and the CTL Proposed Additive.

12 **Q. SOCKET ASSERTS THAT CENTURYTEL HAS NOT PRODUCED COST**
13 **SUPPORT RELATING TO ITS NRCS. (TURNER DIRECT AT 48) IS THAT**
14 **TRUE?**

15 A. No, it is not. Contrary to Socket's assumption, which is apparently based on the cost studies
16 CenturyTel performed for recurring DS1 and DS3 UNE loop rates, I provided cost support
17 for CenturyTel's proposed NRCS in my direct testimony. T. Hankins Direct at 5-7.

18 **Q. HAS CENTURYTEL PROVIDED COST SUPPORT FOR ITS ALTERNATIVE**
19 **NONRECURRING CHARGES?**

20 A. Yes. I provided cost support for CenturyTel's proposed alternative NRCS, or the additives or
21 surcharges, in my direct testimony (9-14), in Proprietary Schedule TMH-2 to my direct
22 testimony, and in response to Socket's data request. As I explained, CenturyTel's alternative
23 NRC proposal establishes NRCS based on a Comparative Analysis utilizing the NRCS

1 proposed by Socket as the starting point. Schedule TMH-Reb-1. Although the resulting
2 NRCs appear high, they are cost-justified (based on Socket's demand and the demand from
3 other CLECs operating in the state of Missouri) and are necessary to afford CenturyTel cost
4 recovery.

5 **V.**
6 **CONCLUSION**

7 **Q. WHAT SHOULD THE COMMISSION DO ABOUT NRCS?**

8 **A.** Based on the record evidence, the Commission should adopt CenturyTel's proposed Non-
9 Recurring Charges. Socket has utterly failed to prove its case and, in any event, CenturyTel
10 has definitively repudiated the Socket assumption that SBC rates necessarily extend to
11 CenturyTel's rural Missouri operations. Moreover, CenturyTel has demonstrated that its
12 NRC proposal is appropriate: GTE-based UNE NRCs in existing Commission-approved ICA
13 if no electronic OSS is ordered or the alternative NRCs, or the additive or surcharge, if
14 CenturyTel must develop and implement electronic OSS for Socket. In either event, the
15 record dictates adoption of the CenturyTel Non-Recurring Charge proposal.

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 **A.** Yes, it does.

SCHEDULE TMH-Rev-1

Schedule of Prices

SOCKET Proposed Prices

CTL Proposed Additive

CTL Proposed Rates

Socket Proposed Prices + Socket Proposed Full Electronic Access to OSS Additive

Electronic Access to OSS

NOTE	Service	Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate		Nonrecurring Rate	
		First	Additional	First	Additional	First	Additional	First	Additional	First	Additional	First	Additional	First	Additional	First	Additional	First	Additional
Network Interface Device	Disconnected Loop from Inside wiring, per NID	\$ 23.00	\$	14.32		\$ 396.36	\$	248.75		\$ 419.36	\$	281.07							
Unbundled Loops																			
2W Analog Zone 1		\$ 19.55	\$	8.32		\$ 336.92	\$	143.32		\$ 356.47	\$	151.64							
2W Analog Zone 2		\$ 19.55	\$	8.32		\$ 336.92	\$	143.32		\$ 356.47	\$	151.64							
2W Analog Zone 3		\$ 19.55	\$	8.32		\$ 336.92	\$	143.32		\$ 356.47	\$	151.64							
2W Analog Zone 4		\$ 19.55	\$	8.32		\$ 336.92	\$	143.32		\$ 356.47	\$	151.64							
Conditioning for dB Loss																			
4W Analog Zone 1		\$ 21.56	\$	8.32		\$ 302.27	\$	147.86		\$ 319.81	\$	156.43							
4W Analog Zone 2		\$ 21.56	\$	8.32		\$ 302.27	\$	147.86		\$ 319.81	\$	156.43							
4W Analog Zone 3		\$ 21.56	\$	8.32		\$ 302.27	\$	147.86		\$ 319.81	\$	156.43							
4W Analog Zone 4		\$ 21.56	\$	8.32		\$ 302.27	\$	147.86		\$ 319.81	\$	156.43							
2W Digital Zone 1		\$ 43.33	\$	22.67		\$ 746.59	\$	390.55		\$ 789.92	\$	413.22							
2W Digital Zone 2		\$ 43.33	\$	22.67		\$ 746.59	\$	390.55		\$ 789.92	\$	413.22							
2W Digital Zone 3		\$ 43.33	\$	22.67		\$ 746.59	\$	390.55		\$ 789.92	\$	413.22							
2W Digital Zone 4		\$ 43.33	\$	22.67		\$ 746.59	\$	390.55		\$ 789.92	\$	413.22							
DS1 Loop Zone 1		\$ 102.47	\$	40.46		\$ 1,785.74	\$	887.09		\$ 1,868.21	\$	737.55							
DS1 Loop Zone 2		\$ 102.47	\$	40.46		\$ 1,785.74	\$	887.09		\$ 1,868.21	\$	737.55							
DS1 Loop Zone 3		\$ 102.47	\$	40.46		\$ 1,785.74	\$	887.09		\$ 1,868.21	\$	737.55							
DS1 Loop Zone 4		\$ 102.47	\$	40.46		\$ 1,785.74	\$	887.09		\$ 1,868.21	\$	737.55							
DS3 Loop Zone 1		\$ 845.75	\$	375.03		\$ 14,573.43	\$	6,462.28		\$ 15,419.18	\$	8,837.31							
DS3 Loop Zone 2		\$ 845.75	\$	375.03		\$ 14,573.43	\$	6,462.28		\$ 15,419.18	\$	8,837.31							
DS3 Loop Zone 3		\$ 845.75	\$	375.03		\$ 14,573.43	\$	6,462.28		\$ 15,419.18	\$	8,837.31							
DS3 Loop Zone 4		\$ 845.75	\$	375.03		\$ 14,573.43	\$	6,462.28		\$ 15,419.18	\$	8,837.31							
DSL Clear Channel																			
DSL Clear Channel		\$0	\$0	\$0		\$0	\$0	\$0		\$0	\$0	\$0							
DSL Capable Loops																			
2 Wire xDSL Loop Zone 1		\$ 19.55	\$	8.32		\$ 336.92	\$	143.36		\$ 356.42	\$	151.68							
2 Wire xDSL Loop Zone 2		\$ 19.55	\$	8.32		\$ 336.92	\$	143.36		\$ 356.42	\$	151.68							
2 Wire xDSL Loop Zone 3		\$ 19.55	\$	8.32		\$ 336.92	\$	143.36		\$ 356.42	\$	151.68							
2 Wire xDSL Loop Zone 4		\$ 19.55	\$	8.32		\$ 336.92	\$	143.36		\$ 356.42	\$	151.68							
4 Wire xDSL Loop Zone 1		\$ 21.56	\$	8.32		\$ 371.85	\$	143.36		\$ 393.43	\$	151.68							
4 Wire xDSL Loop Zone 2		\$ 21.56	\$	8.32		\$ 371.85	\$	143.36		\$ 393.43	\$	151.68							
4 Wire xDSL Loop Zone 3		\$ 21.56	\$	8.32		\$ 371.85	\$	143.36		\$ 393.43	\$	151.68							
4 Wire xDSL Loop Zone 4		\$ 21.56	\$	8.32		\$ 371.85	\$	143.36		\$ 393.43	\$	151.68							
Loop Qualification Process																			
Loop Qualification Process - Mechanized		\$ 84.15		N/A		\$ 1,450.02		N/A		\$ 1,534.17		N/A							
Loop Qualification Process - Manual																			
xDSL Conditioning Options																			
xDSL standard conditioning Charge applied per each xDSL Loop activation*		\$ 8.41		NA		\$ -		NA		\$ 8.41		NA							
Removal of Repeater*		\$ 221.96		None		\$ -		None		\$ 221.96		None							
Removal of Excessive Bridged Tap*		\$ 221.96		None		\$ -		None		\$ 221.96		None							

SOCKET Proposed Prices				CTL Proposed Additive		CTL Proposed Rates	
Schedule of Prices				Electronic Access to OSS		Socket Proposed Prices + Socket Proposed Full Electronic Access to OSS Additive	
NOTE	Service	Nonrecurring Rate First	Nonrecurring Rate Additional	Nonrecurring Rate First	Nonrecurring Rate Additional	Nonrecurring Rate First	Nonrecurring Rate Additional
Removal of Load Coil*		\$ 325.83	None	\$ -	None	\$ 325.83	None
* All Rates Applied as set forth in Article XVIII - xDSL							
CROSS CONNECTS							
4 Wire		\$ 25.38	\$ 17.73	\$ 437.33	\$ 305.51	\$ 462.71	\$ 323.24
2 Wire		\$ 28.87	\$ 22.08	\$ 483.05	\$ 380.47	\$ 489.92	\$ 402.55
DSL Loop 4W		\$ 45.03	\$ 34.16	\$ 775.93	\$ 588.82	\$ 820.96	\$ 622.78
DSL Loop Crossconnect - Install		\$ 54.98	\$ 42.09	\$ 947.38	\$ 725.27	\$ 1,002.36	\$ 767.38
SubLoop Distribution							
2W Analog Zone 1		\$ 85.08	\$ 35.46	\$ 1,466.04	\$ 611.02	\$ 1,551.12	\$ 646.48
2W Analog Zone 2		\$ 85.08	\$ 35.46	\$ 1,466.04	\$ 611.02	\$ 1,551.12	\$ 646.48
2W Analog Zone 3		\$ 85.08	\$ 35.46	\$ 1,466.04	\$ 611.02	\$ 1,551.12	\$ 646.48
2W Analog Zone 4		\$ 85.08	\$ 35.46	\$ 1,466.04	\$ 611.02	\$ 1,551.12	\$ 646.48
2W Digital Zone 1		\$ 86.76	\$ 38.57	\$ 1,494.99	\$ 664.66	\$ 1,581.75	\$ 703.23
2W Digital Zone 2		\$ 86.76	\$ 38.57	\$ 1,494.99	\$ 664.66	\$ 1,581.75	\$ 703.23
2W Digital Zone 3		\$ 86.76	\$ 38.57	\$ 1,494.99	\$ 664.66	\$ 1,581.75	\$ 703.23
2W Digital Zone 4		\$ 86.76	\$ 38.57	\$ 1,494.99	\$ 664.66	\$ 1,581.75	\$ 703.23
Routine Network Modifications		ICB	NA	ICB	NA	ICB	NA
Service Order Charges - Unbundled Elements							
Manual Service Order Type Charges - Unbundled Elements*							
New Simple		\$ 12.56	None	\$ 216.50	None	\$ 229.06	None
New Complex		\$ 74.90	None	\$ 1,290.59	None	\$ 1,365.49	None
Change Simple		\$ 4.91	None	\$ 84.85	None	\$ 89.56	None
Change Complex		\$ 74.90	None	\$ 1,290.59	None	\$ 1,365.49	None
Record Simple		\$ 6.28	None	\$ 108.25	None	\$ 114.53	None
Record Complex		\$ 6.28	None	\$ 108.25	None	\$ 114.53	None
Disconnect Simple		\$ 5.32	None	\$ 91.67	None	\$ 96.99	None
Disconnect Complex		\$ 27.29	None	\$ 470.25	None	\$ 487.54	None
Suspend Simple		\$ 2.52	None	\$ 43.49	None	\$ 46.01	None
Suspend Complex		\$ 2.52	None	\$ 43.49	None	\$ 46.01	None
Restore Simple		\$ 2.52	None	\$ 43.49	None	\$ 46.01	None
Restore Complex		\$ 2.52	None	\$ 43.49	None	\$ 46.01	None
Expedited Simple		\$ 12.60	None	\$ 217.08	None	\$ 229.68	None
Expedited Complex		\$ 12.60	None	\$ 217.08	None	\$ 229.68	None
Due Date Change Simple		\$ 4.20	None	\$ 72.36	None	\$ 76.56	None
Due Date Change Complex		\$ 4.20	None	\$ 72.36	None	\$ 76.56	None
Cancellation Simple		\$ 4.20	None	\$ 72.36	None	\$ 76.56	None
Cancellation Complex		\$ 4.20	None	\$ 72.36	None	\$ 76.56	None
PIG Change Charge		\$ 5.83	\$ 1.52	\$ 100.48	\$ 1.52	\$ 106.29	\$ 3.04
* Manual Service Order Type Charges only apply when Electronic Systems are available but Socket chooses to use Manual Systems							
Electronic - UNE Service Order Type Charges							
Electronic - UNE Service Order		\$ 3.92	None	\$ 67.55	None	\$ 71.47	None
Suspend Simple		\$ 0.12	None	\$ 2.15	None	\$ 2.27	None
Suspend Complex		\$ 0.12	None	\$ 2.15	None	\$ 2.27	None
Restore Simple		\$ 0.12	None	\$ 2.15	None	\$ 2.27	None
Restore Complex		\$ 0.12	None	\$ 2.15	None	\$ 2.27	None

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SOCKET Proposed Prices					CTL Proposed Additive		CTL Proposed Rates	
Schedule of Prices					Electronic Access to OSS		Socket Proposed Prices + Socket Proposed Full Electronic Access to OSS Additive	
NOTE	Service	Nonrecurring Rate First	Nonrecurring Rate Additional		Nonrecurring Rate First	Nonrecurring Rate Additional	Nonrecurring Rate First	Nonrecurring Rate Additional
	Expedited Simple	\$ 8.43	None		\$ 110.78	None	\$ 117.21	None
	Expedited Complex	\$ 8.43	None		\$ 110.78	None	\$ 117.21	None
	Due Date Change Simple	\$ 2.14	None		\$ 36.86	None	\$ 39.00	None
	Due Date Change Complex	\$ 2.14	None		\$ 36.86	None	\$ 39.00	None
	Cancellation Simple	\$ 2.14	None		\$ 36.86	None	\$ 39.00	None
	Cancellation Complex	\$ 2.14	None		\$ 36.86	None	\$ 39.00	None
	Disconnect Simple	\$ -			\$ 57.20	None	\$ 57.20	None
	Disconnect Complex	\$ -			\$ 146.72	None	\$ 146.72	None
Interconnection Dedicated Transport								
DS1 Entrance Facilities								
	Zone 1 - Install	\$ 261.35	\$ 127.19		\$ 4,503.42	\$ 2,191.66	\$ 4,764.77	\$ 2,318.85
	Zone 1 - Disconnect	\$ 118.42	\$ 17.34		\$ 2,040.54	\$ 298.79	\$ 2,158.96	\$ 316.13
DS3 Entrance Facilities								
	Zone 1 - Install	\$ 256.36	\$ 92.36		\$ 4,417.43	\$ 1,591.49	\$ 4,673.79	\$ 1,683.85
	Zone 1 - Disconnect	\$ 141.40	\$ 35.07		\$ 2,436.52	\$ 604.30	\$ 2,577.92	\$ 639.37
Dedicated Transport - Interoffice Transport								
	DS1 Dedicated Transport - per Termination	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -
	DS1 Transport - per mile	n/a	n/a		n/a	n/a	n/a	n/a
	DS3 Dedicated Transport - per Termination	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -
	DS3 Transport - per mile	n/a	n/a		n/a	n/a	n/a	n/a
Dark Fiber - interoffice - per 1KFT								
	24 Fiber Aerial	None	None		None	None	None	None
	24 Fiber Underground	None	None		None	None	None	None
	24 Fiber Buried	None	None		None	None	None	None
	48 Fiber Aerial	None	None		None	None	None	None
	48 Fiber Underground	None	None		None	None	None	None
	48 Fiber Buried	None	None		None	None	None	None
	96 Fiber Aerial	None	None		None	None	None	None
	96 Fiber Underground	None	None		None	None	None	None
	96 Fiber Buried	None	None		None	None	None	None
Fiber Termination Equipment/month/month								
Interoffice Transport Termination Equipment per Month								
Interoffice Pass-Thru Office Term. Equip. per Month								
Multiplexing - All Zones								
	DS1 to Voice Grade - Install	\$ 86.04	\$ 68.43		\$ 1,482.59	\$ 1,179.14	\$ 1,568.63	\$ 1,247.57
	DS1 to Voice Grade - Disconnect	\$ 13.51	\$ 11.65		\$ 232.80	\$ 200.75	\$ 246.31	\$ 212.40
	DS3 to DS1 - Install	\$ 201.77	\$ 156.50		\$ 3,478.77	\$ 2,696.71	\$ 3,678.54	\$ 2,853.21
	DS3 to DS1 - Disconnect	\$ 44.51	\$ 32.12		\$ 766.97	\$ 553.47	\$ 811.48	\$ 585.69
Mechanized UNE Service Order Charge								
		\$ 3.92	None		\$ 3.92	None	\$ 3.92	None
Maintenance of Service Charges								
	Basic Time - per half hour	\$ 30.93	\$ 21.32		\$ -	\$ -	\$ 30.93	\$ 21.32
	Overtime - per half hour	\$ 36.35	\$ 26.73		\$ -	\$ -	\$ 36.35	\$ 26.73

Schedule of Prices		SOCKET Proposed Prices		CTL Proposed Additive		CTL Proposed Rates	
				Electronic Access to OSS		Socket Proposed Prices + Socket Proposed Full Electronic Access to OSS Additive	
		Nonrecurring Rate First	Nonrecurring Rate Additional	Nonrecurring Rate First	Nonrecurring Rate Additional	Nonrecurring Rate First	Nonrecurring Rate Additional
NOTE	Service						
	Premium Time - per half hour	\$ 41.77	\$ 32.15	\$ -	\$ -	\$ 41.77	\$ 32.15
	Time and Materials Charges						
	Basic Time - per half hour	\$ 30.93	\$ 21.32	\$ -	\$ -	\$ 30.93	\$ 21.32
	Overtime - per half hour	\$ 36.35	\$ 26.73	\$ -	\$ -	\$ 36.35	\$ 26.73
	Premium Time - per half hour	\$ 41.77	\$ 32.15	\$ -	\$ -	\$ 41.77	\$ 32.15
	Nonproductive Dispatch Charges						
	Basic Time - per half hour	\$ 30.93	\$ 21.32	\$ -	\$ -	\$ 30.93	\$ 21.32
	Overtime - per half hour	\$ 36.35	\$ 26.73	\$ -	\$ -	\$ 36.35	\$ 26.73
	Premium Time - per half hour	\$ 41.77	\$ 32.15	\$ -	\$ -	\$ 41.77	\$ 32.15
INTERCARRIER COMPENSATION -							
	End Office Switching						
	per MOU	None	None	None	None	None	None
	Tandem Switching						
	Duration charge, per MOU	None	None	None	None	None	None
	Tandem Transport Termination						
	per MOU	None	None	None	None	None	None
	Tandem Transport Facility Mileage						
	Facility per Mile	None	None	None	None	None	None