

Exhibit No.:

Issue: Mass Market/Enterprise
Market Cross Over

Witness: John F. Finnegan

Sponsoring Party: AT&T Communications of
the Southwest, Inc., TCG
Kansas City, Inc. and
TCG St. Louis, Inc.

Type of Exhibit: Rebuttal Testimony

Case No.: TO-2004-0207

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.,
TCG KANSAS CITY, INC. AND TCG ST. LOUIS, INC.**

REBUTTAL TESTIMONY

OF

JOHN F. FINNEGAN

TO-2004-0207

January 16, 2004

FILED

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**Missouri Public
Service Commission**

Exhibit No. 17

Case No(s). TO-2004-0207

Date KE **Rptr** KE

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

A. My name is John F. Finnegan. My address is 1875 Lawrence St., Denver, CO 80202. I am a Senior Policy Witness in AT&T's Law and Government Affairs organization.

Q. ARE YOU THE SAME JOHN F. FINNEGAN THAT CAUSED DIRECT TESTIMONY TO BE SUBMITTED IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to issues relating to the cross over analysis I submitted in my Direct Testimony that were raised by Telecommunications Department Staff ("Staff") witness Christopher C. Thomas. Mr. Thomas indicated that Staff "supports the type of analysis performed by Mr. Finnegan, as it appears to be the most comprehensive study of the cost differential between providing service using DS0 and DS1 loops on an unbundled basis, including additional costs that a firm incurs when using UNE-Loop (UNE-L) over UNE-Platform (UNE-P)" if "more detailed cost information" supporting my analysis were provided.¹ In this testimony, I attempt to respond to the specific issues that Mr. Thomas raised in his rebuttal testimony. My testimony also responds to the testimony submitted by SBC Missouri's witness Gary A. Fleming.

¹ Thomas Rebuttal Testimony, pp. 6-7.

Response to Mr. Thomas

**Q. WHAT SPECIFIC ADDITIONAL INFORMATION DID STAFF WITNESS
THOMAS REQUEST YOU PROVIDE REGARDING THE AT&T CROSS
OVER ANALYSIS?**

A. Specifically, Staff Witness Christopher Thomas requested that I supply the
following additional information regarding the cross over analysis I supplied in
my Direct Testimony:

1. Additional supporting information for the marketing cost differential between marketing to mass market and enterprise customers of \$625 as identified on page 6 of Mr. Finnegan's Direct Testimony;
2. Detailed analysis of the monthly UNE-P rate that Mr. Finnegan calculated, including supporting information for the 1,668 minutes used to estimate usage sensitive charges, identified in footnote 27 on page 14 of Mr. Finnegan's Direct Testimony;
3. Supporting information for the 30% discount that Mr. Finnegan identifies as the discount that efficient CLECs would likely obtain from CPE suppliers, and the source of the Adtran channel bank equipment, AC/DC power supply and battery charger and backup battery system prices;
4. Supporting information for the time estimates used in calculating the cost of installing CPE equipment;
5. Supporting information used to develop the average CPE maintenance cost per year;
6. Supporting information for the time estimates used in calculating the cost of CPE removal;
7. Supporting information detailing the cost of the Edgelink 100 multiplexer;
8. Support detailing the monthly recurring cost to backhaul a CLEC customer's DS1 circuits to on the transport DS3.²

² Thomas Rebuttal, pp. 7-8.

1 In the testimony that follows, I provide the information requested by Staff
2 Witness Thomas.

3
4 **Q. WHERE DID YOU OBTAIN THE PRICES FOR THE ADTRAN**
5 **CHANNEL BANK EQUIPMENT, THE BATTERY BACKUP AND THE**
6 **POWER SUPPLY/BATTERY CHARGER?**

7 A. I obtained the price information for this equipment from the
8 ComputerAnimal.com website. For ease of reference, I have attached the
9 printouts from the website as Exhibit JFF-5. As can be seen from Exhibit JFF-5,
10 ComputerAnimal.com lists the retail prices for the Adtran 750, the battery backup
11 and the power supply/battery charger respectively as \$2,496, \$425 and \$240. The
12 total retail price for the three items is \$3,161. As can also be seen in Exhibit JFF-
13 5, ComputerAnimal.com offers to sell the Adtran 750, the battery backup and the
14 power supply/battery charger respectively for \$1874.70, \$345.97 and \$189.79.
15 The total price that ComputerAnimal.com offers to sell the three products is
16 \$2,410.46. The ComputerAnimal.com offered price is a 23.7% lower than the list
17 price.

18
19 While ComputerAnimal.com does not offer any volume discounts for the three
20 products,³ I assumed that a carrier that purchases quantities of units should be able
21 to get better than the 23.7% discount off of the list price. For the purpose of the
22 analysis, I assumed a discount of 30%.

³ On the ComputerAnimal.com website, I priced out the three products with quantities of 1,000 units and the unit price was the same as for one unit.

Q. HOW DID YOU ARRIVE AT YOUR ESTIMATE OF THE BACKHAUL COSTS FOR THE DS1 SERVICE?

A. The backhaul cost estimates were based upon prices found in SWBT's FCC special access tariffs for a DS3 capacity circuit. Specifically, I relied upon *Southwestern Bell Telephone Company, Tariff F.C.C. No. 73* that was effective July 1, 2003.⁴ SWBT's special access prices include a fixed rate and a rate that varies per mile. SWBT's prices vary in each of the three rate zones in Missouri and they vary depending upon whether the service area is under price cap regulation or SWBT has received pricing flexibility in the area. A summary of the relevant prices and the citation for the prices is found in the below table.

Type of Price Regulation	Zone	Contract Term	Fixed Rate	Per Mile Rate
Price Cap	1	5	\$400.00 ⁵	\$37.50 ⁶
Price Cap	2	5	\$410.00 ⁷	\$40.00 ⁸
Price Cap	3	5	\$420.00 ⁹	\$42.50 ¹⁰
Pricing Flexibility	1	5	\$450.00 ¹¹	\$45.00 ¹²
Pricing Flexibility	2	5	\$475.00 ¹³	\$50.00 ¹⁴
Pricing Flexibility	3	5	\$500.00 ¹⁵	\$55.00 ¹⁶

⁴ For ease of reference, I have attached a copy of the relevant tariff pages to this testimony as Exhibit JFF-6.

⁵ *Southwestern Bell Telephone Company, Tariff F.C.C. No. 73*, p. 20-47.8, Section 20.5.3 (G).

⁶ *Id.*, 20-47.15, Section 20.5.4 (G), Volume Option 1.

⁷ *Id.*, p. 20-47.8, Section 20.5.3 (H).

⁸ *Id.*, p. 20-47.15, Section 20.5.4 (H), Volume Option 1.

⁹ *Id.*, Section 20.5.3 (I).

¹⁰ *Id.*, p. 20-47.15, Section 20.5.4 (I), Volume Option 1.

¹¹ *Id.*, p. 39-154, Section 39.5.2.12 (C) (7).

¹² *Id.*, p. 39-161, Section 39.5.2.12 (D) (7), Volume Option 1.

¹³ *Id.*, p. 39-154, Section 39.5.2.12 (C) (8).

¹⁴ *Id.*, p. 39-161, Section 39.5.2.12 (D) (8), Volume Option 1.

¹⁵ *Id.*, p. 39-154, Section 39.5.2.12 (C) (9).

		Average Rate	\$442.50	\$45.00
		Average Rate w/ 13% Discount	\$384.975	\$39.15

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I calculated the average fixed and per mile rates because the cross over analysis is not based upon any specific CLEC switch location. The CLEC's switch could be placed in any of the rate zones or in an area that is under price cap regulation or pricing flexibility. As a conservative assumption, I used a five-year contract term in order to obtain the lowest special access pricing. If a carrier were obtaining special access via SWBT's "Managed Value Plan," the carrier would be entitled to a discount. For the purpose of the model, I conservatively assumed the service was purchased under a 5-year optional payment plan and that the carrier was in the fourth year of a five-year Managed Value Plan (MVP) contract. That would entitle the carrier to a 13% discount.¹⁷

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As identified in my Direct Testimony, I assumed the CLEC was backhauling the traffic three miles. The fixed rate (\$384.98) plus the mileage charges ($3 * \$39.15 = \117.45) results in a DS3 monthly rate of \$502.43. I conservatively assumed that all 28 DS1 channels in the DS3 circuit were utilized. Consequently, I calculated the monthly rate for one DS1 channel in the DS3 circuit as 1/28 of the cost of the DS3 or \$17.94.

¹⁶ *Id.*, p. 39-161, Section 39.5.2.12 (D) (9), Volume Option 1.

¹⁷ *Id.*, p. 38-9, Section 38.3 (E) (3).

1 **Q. PLEASE DESCRIBE HOW THE UNE-P COSTS THAT YOU USED IN**
2 **THE CROSS OVER ANALYSIS WERE DETERMINED.**

3 A. The UNE-P costs were based upon the costs for: 1) the 2-wire analog loop
4 recurring rate; 2) the analog switch port recurring rate; 3) usage sensitive
5 recurring rate elements (end office switching, common switched transport,
6 tandem switching, and signaling) charges; and 4) an amortized cost of annual
7 white pages book delivery to the UNE-P customer. For ease of reference, the
8 costs are summarized in Exhibit JFF-7 to this testimony. The rate zone-specific
9 recurring rates for the 2-wire analog loop and the analog switch port were taken
10 from the SBC Missouri interconnection agreement know as the “Missouri 271
11 Agreement” (“M2A”) *Appendix Pricing UNE Schedule of Prices*, dated June 27,
12 2003. The charges for the white page book delivery were taken from Attachment
13 19 to the M2A. The specific charges used were the rates for “Price Per Book
14 Copy Delivered to CLEC End User.” Since customers expect new white page
15 books to be delivered approximately once a year, the non-recurring rate for the
16 book delivery was amortized over a twelve-month period by dividing the rate by
17 twelve.

18
19 The usage-sensitive charges were determined by applying the rate zone specific
20 charges for: 1) originating end office switching; 2) common switched transport; 3)
21 tandem switching usage; and 4) terminating end office switching. The 1,668
22 minutes of use that the applicable rates were applied to included originating and
23 terminating minutes for: 1) local calls; 2) IntraLATA calls; 3) InterLATA,

1 Intrastate calls; and 4) InterLATA, Interstate calls (including international calls).

2 An additional charge was assessed per message for signaling charges.

3
4 **Q. CAN YOU OFFER ADDITIONAL SUPPORT FOR THE ASSERTION IN**
5 **YOUR DIRECT TESTIMONY THAT THE SALES AND MARKETING**
6 **SUPPORT FOR SELLING A DS1 BASED SERVICE IS MORE**
7 **EXPENSIVE THAN SIMILAR SUPPORT FOR ANALOG BASED**
8 **SOLUTIONS?**

9 A. Yes. Industry analysts have reported that the RBOCs view the additional sales
10 and marketing expense as an obstacle to the offering of an Integrated Access
11 Service (“IAS”) DS1 service. Specifically, one analyst stated:

12
13 Another obstacle they report is that integrated services require a
14 consultative sales process. “This is simply not done for the SMB
15 [Small and Medium Business] market by the RBOCs and large
16 IXC. When addressing the SMB market, RBOCs and IXCs do no
17 use site visits, multiple meetings and they certainly do not offer
18 individualize services,” reports NetCon.¹⁸

19 Another analyst reported, “RBOCs have learned – as a result of competitive
20 losses to CLECs in major metros – that service to SMBs must be hands-on and
21 direct.”¹⁹ It was also reported:

22
23 The market has not yet reached its competitive potential for two
24 main reasons: RBOC trepidation and CLEC financial constraints.
25 BellSouth, Verizon, and SBC offer integrated access in their in-
26 region product portfolios, with Qwest on the sidelines. The lack of

¹⁸ *Wooing SMBs with Integrated Service*, Khali Henderson and Tara Seals. Phone+, Accessed at <http://www.phoneplusmag.com/articles/321FEAT1.html>.

¹⁹ *Integrated Access: The Last Great CLEC Hope*, The Yankee Group Report, Michael Lauricella, July 2003, p. 5.

1 a sales and marketing push by the RBOCs means none are truly in
2 the game. Concerns about cannibalization are driving RBOC
3 hesitancy – at the low end, integrated access may challenge DSL.
4 At the high end, customers may trade down from more expensive
5 services. However, the slow-footedness of the RBOCs will prove
6 costly.

7
8 CLECs have seen a great deal of success despite considerable
9 financial pressure and customer skepticism. As CLEC move
10 toward positive cash flow, marketing expenditures will increase
11 and expansion will resume.²⁰

12
13 Analysts reported that BellSouth greatly increased its sales and marketing support
14 once it entered the integrated access service market. Specifically, it was stated:

15 BellSouth entered the integrated access space out of competitive
16 necessity, forced to respond after CLECs demonstrated its market
17 potential. It uses the offering as a tool for customer retention and
18 reacquisition.

19
20 The number of sales staff focused on this service at BellSouth
21 underscores its importance. BellSouth has added its first premises-
22 based agents to its small business division, and has doubled the
23 number of sales staff in the general business division.²¹

24
25 The higher costs of marketing a DS1-based service was also recognized when it
26 was reported after Qwest made a bid for the assets of Allegiance Telecom:

27
28 To be successful, Qwest must lower the sales and marketing
29 expenses of Allegiance. Qwest cannot afford to use a direct
30 salesforce to call on the very smallest SMBs, and it cannot afford
31 to ignore the more individualized needs of its largest SMBs.
32 Allegiance was not able to resolve this sales and marketing
33 conundrum, but Qwest must, if it is to be successful.²²

34

²⁰ *Id.*, p. 6.

²¹ *Id.*, p. 7.

²² *Qwest Pledges Allegiance to Compete on a National Scale*, Mike Lauricella, Nancy Bedard and Steve Hilton, The Yankee Group, Research Note: December 30, 2003, p. 2.

1 **Q. PLEASE EXPLAIN HOW YOU ARRIVED AT THE COST FOR THE**
2 **EDGE LINK 100 1:3 MULTIPLEXER IN THE CROSS OVER ANALYSIS.**

3 A. As an initial matter, in my direct testimony, I identified the cost of an Edgeline
4 100 1:3 multiplexer as \$3,600. That number used in the analysis should have
5 been \$3,000. Using the revised figure and assuming that twenty-eight DS1
6 circuits are being multiplexed by the multiplexers in the CLEC's collocation, a
7 single DS1 loop would be responsible for 1/28 of the \$3,000 cost of each
8 multiplexer, or \$107.14.²³ In contrast, SBC estimates a multiplexing capital cost
9 of \$538.00 per DS1.²⁴ In comparison to SBC's estimate, my estimate of the
10 capital cost for multiplexing of the DS1 in the CLEC's collocation is
11 conservatively low. I have attached to this testimony a revised cross over analysis
12 that uses the revised cost of the Edgeline 100 unit as Exhibit JFF-8. It should be
13 noted that the revision of the cost of the Edgeline 100 unit did not impact the
14 overall cross over point in Missouri. It remains at thirteen lines.

15
16 For the Edgeline 100 1:3 Multiplexer, I used a cost estimate that was based on
17 research conducted by AT&T that was validated as consistent with AT&T's
18 marketplace experience.²⁵ To provide for a conservative estimate, that cost did
19 not include any typical costs for the engineering and installation of the equipment.

²³ The per DS1 loop investment assumed for this analysis was calculated as follows: 1 multiplexer * 1/28 * 3,000 = \$107.14.

²⁴ Flemming Direct Testimony, Schedule GAF-6 p.5.

²⁵ The cost of the 1:3 multiplexer of \$3,000 is what AT&T has been using in the DS0 impairment tool that AT&T has been filing in many of the states conducting a Triennial Review potential deployment investigation.

1 **Q. WHAT MUST THE CLEC DO TO INSTALL THE CHANNEL BANK AND**
2 **BATTERY BACKUP EQUIPMENT?**

3 A. To install the equipment, a CLEC must dispatch a technician to the customer's
4 location. To connect the copper inside wire leading from the individual telephone
5 lines to the channel bank equipment, the technician must cross-connect the
6 customer side of the channel bank to an existing cross-connection device. If such
7 a device does not exist independently of the analog NID, the technician must also
8 deploy such a NID. The network side of the channel bank must be wired to the
9 NID upon which the DS1 loop terminated. The battery backup unit must also be
10 installed and connected to both the commercial power and the channel bank.
11 Finally, the entire configuration must be tested for proper operation. I assumed
12 that two hours of labor (including travel time) would be required.

13

14 **Q. DID YOU COMPARE YOUR DS1 CHANNEL BANK EQUIPMENT**
15 **INSTALLATION COST ESTIMATES TO ANY OTHER SOURCES?**

16 A. Yes. I examined on Adtran's website the prices Adtran would charge for the
17 installation of its Total Access 750 equipment. Adtran quoted a charge of
18 \$375.00 for a Remote Installation and \$990.00 for an Onsite Installation.²⁶ I also
19 examined Allegiance Telecom's tariffed rate in Missouri for the installation of its
20 Integrated Access Service. Allegiance charges a non-recurring charge of
21 \$899.00.²⁷

²⁶ For ease of reference a copy of the Adtran installation quote is attached to this testimony as Exhibit JFF-9.

²⁷ For ease of reference a copy of the relevant Allegiance Tariff pages are attached to this testimony as Exhibit JFF-10.

1 **Q. WHAT CONCLUSION DID YOU REACH ABOUT YOUR**
2 **INSTALLATION COST ESTIMATES AFTER REVIEWING THE**
3 **ADTRAN AND ALLEGIANCE INSTALLATION COSTS?**

4 A. I concluded that my estimates of the installation costs were conservatively low.

6 **Q. WHAT DATA DID YOU EXAMINE IN SUPPORT OF YOUR ESTIMATE**
7 **OF THE REPAIR RATE FOR THE CHANNEL BANK EQUIPMENT?**

8 A. I examined trouble rate data for Qwest DS1 capable loops. While recognizing
9 that the trouble rate for an unbundled loop is not the same as the trouble rate for
10 the Channel Bank Equipment, I viewed the DS1 trouble rate data as a sanity
11 check for my assumption of one repair visit every three years. I used Qwest DS1
12 unbundled loop data because I often review it, it is publicly available and I was
13 unable to review any similar SBC data without an SBC-provided password. The
14 Qwest results were the monthly trouble rate results for its entire fourteen state
15 region for DS1 capable loops.²⁸ The trouble rates for the last six months are
16 shown in the table below.

Month	Regional DS1 Capable Loop Trouble Rate
Nov-03	3.07
Oct-03	2.93
Sep-03	2.90
Aug-03	3.72
Jul-03	3.81
Jun-03	3.45

²⁸ Qwest Performance Results, Regional, December 02 – November 03, PID Format, December 18, 2003, p. 309. The complete performance measurements report can be viewed at http://www.qwest.com/wholesale/downloads/2003/031219/RG_271_Dec02-Nov03_Exhibit_PID-Final.pdf.

1 The Qwest DS1 capable loop trouble rate of about 3% a month or 36% in a year
2 added support to my assumption of a repair visit once every three years.

3

4 **Q. DID YOU COMPARE YOUR MAINTENANCE COST ESTIMATES FOR**
5 **THE CHANNEL BANK EQUIPMENT TO ANY OTHER SOURCES?**

6 A. Yes. The Adtran webpage that provided a quotation for the installation of the
7 Total Access 750 Channel Bank equipment also provided the ability to request a
8 quotation for a Maintenance Contract. Adtran quoted a price of \$330.00 for a
9 one-year service contract and \$891.00 for a three-year service contract for the
10 Adtran Total Access 750 equipment.

11

12 **Q. WHAT CONCLUSION DID YOU REACH ABOUT YOUR**
13 **MAINTENANCE COST ESTIMATES AFTER REVIEWING THE**
14 **ADTRAN MAINTENANCE QUOTATION?**

15 A. I concluded that my estimates of the maintenance costs were conservatively low.

16

17 **Q. WHY DID THE CROSS OVER ANALYSIS INCLUDE A COST FOR THE**
18 **EQUIPMENT REMOVAL?**

19 A. I included this cost because the channel bank equipment may have residual value
20 that allows it to be reused at another customer's location or refurbished and then
21 reused. In addition, from the perspective of the customers, if the customer has
22 changed providers, the customer is likely to want the CLEC to remove the
23 equipment. When the customer terminates the service it receives from the CLEC,

1 the CLEC must send a technician to the customer's premises to disconnect and
2 remove the channel bank and related equipment deployed by the CLEC. For the
3 purpose of the analysis, I estimated that this work would require one hour of labor
4 (including travel).

5

6 **Q. DO YOU HAVE ANY ADDITIONAL COMMENTS REGARDING**
7 **STAFF'S RESPONSE TO YOUR CROSS OVER ANALYSIS?**

8 A. Yes. Staff Witness Thomas states that to the extent he is not satisfied with the
9 additional information I have supplied herein, he would support use of the
10 Sprint's cross over recommendation.²⁹ I would also suggest another alternative to
11 Staff, as well. All of the assumptions and inputs in my analysis are adjustable.
12 So, to the extent Staff thinks my assumptions and inputs are too conservative or
13 otherwise inappropriate, I can work with Staff to make adjustments.

14

15 **Response to Mr. Fleming**

16 **Q. WHAT WERE YOUR GENERAL IMPRESSIONS OF MR. FLEMING'S**
17 **TESTIMONY ON THE DS0 CROSS OVER POINT?**

18 A. My general impression is that there was some commonality in how we both
19 approached the cross over analysis, there were also very significant differences
20 based upon flaws in SBC's assumptions or inputs.

²⁹ Thomas Rebuttal, p. 8.

1 **Q. WHAT WERE SOME OF THE COMMON ASPECTS OF YOUR**
2 **RESPECTIVE ANALYSES?**

3 A. Both analyses:

- 4 1. Attempted to quantify the costs of serving a customer with a DS1
5 based service that is commonly known as an Integrated Access
6 Service (“IAS”);
7
- 8 2. Used Adtran equipment as the customer premises equipment
9 (“CPE”) used to provide the IAS;
10
- 11 3. Amortized certain non-recurring costs over the assumed life of the
12 customer; and
13
- 14 4. Used circuit lives to estimate network costs for network
15 equipment.
16

17 **Q. WHAT IS THE FIRST FLAW THAT YOU IDENTIFIED IN SBC’S CROSS**
18 **OVER ANALYSIS?**

19 A. The first flaw I noted in SBC’s analysis is that Mr. Fleming’s cross over point
20 recommendation deviates from the clear guidance that the FCC provided in how
21 the cross over point should be determined. Certain of Mr. Fleming’s
22 recommendations assume revenue from data services. As I discussed in my
23 Direct Testimony, the FCC suggested that the number of DS0 lines a customer
24 uses at a particular location would be an appropriate unit for the cross over
25 analysis.³⁰ Specifically, the FCC stated, “as part of the economic and operational
26

³⁰ Finnegan Direct Testimony, p. 3.

1 analysis discussed below, a state must determine the appropriate cut-off for multi-
2 line DS0 customers as part of its more granular review.”³¹ The FCC asked the
3 state commissions to identify a bright line number of DS0 lines needed at a
4 particular customer location before the customer crosses over from the mass
5 market to the enterprise market.

6
7 There is no support in the FCC order that a state cross over point decision should
8 make such an assumption. Instead the decision should identify a specific number
9 of DS0 lines.

10
11 The FCC was clear that the cut off should be limited to voice service.

12 Specifically, the FCC stated:

13 We define “DS1 enterprise customers” for our impairment analysis
14 as customers for which it is economically feasible for a competing
15 carrier to ***provide voice service*** with its own switch using a DS1 or
16 above loop. We find that this includes all customers that are
17 served by the competing carrier using a DS1 or above loop. After
18 the state commission conducts a “multiline DS0 cut-off” inquiry, it
19 includes customers who could be served by the competing carrier
20 using a DS1 or above loop.³³

21
22
23 The FCC also stated:

24 At some point, customers taking a sufficient number of multiple
25 DS0 loops could be served in a manner similar to that described
26

³¹ *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket Nos. 01-338, 96-98 & 98-147, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, FCC 03-36 (rel. Aug. 21, 2003) (“*Triennial Review Order*” or “*TRO*”). ¶ 497.

³² Fleming Direct Testimony, p. 34.

³³ TRO, footnote 1296, emphasis added

1 above for enterprise customers – that is, **voice services** provided
2 over one or several DSIs...³⁴

3
4 Given the FCC's direction that the cross over analysis be conducted with voice
5 service, it is inappropriate for Mr. Fleming to interject data services into the
6 equation. Including data services in SBC's analysis is nothing less than SBC
7 bootstrapping.

8
9 **Q. WHAT IS THE SECOND FLAW IN SBC'S APPROACH?**

10 A. The second significant difference is that Mr. Fleming inappropriately assumes
11 there will be a myriad of revenue opportunities available to a CLEC when the
12 CLEC serves the customer but which were not assumed when the customer was a
13 multiline plain old telephone service ("POTS") customer. Mr. Fleming's analysis
14 is internally inconsistent.

15
16 It is self-serving and contrary to how CLECs and even SBC for that matter serve
17 customers for Mr. Fleming to assume no data opportunities with multiple POTS
18 lines and lots of data opportunities with an IAS. In addition to the misuse of data
19 in the analysis, Mr. Fleming's assumption is improper and skews the analysis.

20

³⁴ TRO, ¶ 497, emphasis added.

³⁵ Fleming Direct Testimony, p. 1.

³⁶ Fleming Direct Testimony, Schedule GAF-6, p. 2.

Economy— SBC PremierSERV T1 Integrated Access Solutions *potentially lowers your total telecommunications cost* by combining multiple services on a single facility and maximizing all the available channels. By consolidating your network, *you may minimize your cost.*³⁷ (emphasis added)

Mr. Fleming also recognized that the total revenue from a customer should be reduced when the customer moves from multiple POTS lines to an IAS when he stated, “[m]any CLECs offer service packages that include multiple voice, data, and Internet combinations over a single DS1 line, thereby saving customers money on their overall telecommunications bills.”³⁸ In sum, serving a customer with a DS1 type service is neither going to allow a carrier to sell a wider variety of service to a multiple POTS line customer nor allow the CLEC to charge a premium price. SBC’s notion that there is an “increased revenue opportunity” by serving a multiple POTS line customer with a DS1 type service is not supported by the realities of the small and medium business market or SBC’s own marketing information.

Q. WHAT IS THE THIRD SIGNIFICANT FLAW IN SBC’S APPROACH?

A. The third significant flaw is that Mr. Fleming compares the cost of the DS1 service to the cost of a CLEC serving the customer with its own switch and multiple SBC loops. It is inappropriate to compare the DS1 costs to the costs of a CLEC’s own switch and SBC-provided loops (hereafter referred to as UNE-L). Rather, the comparison should be between the costs to serve a customer with a

³⁷ Viewed at http://www01.sbc.com/Products_Services/Business/ProdInfo_1/1,,1205--4-1-33,00.html on January 15, 2004.

³⁸ Fleming Direct, p. 30.

1 DS1 service and the costs to serve the customer with multiple UNE-P lines. This
2 issue is fundamentally about the number of lines below which SBC would no
3 longer have to offer mass market switching at TELRIC rates. For mass market
4 customers, UNE-P is the most economical method of serving the customer and
5 consequently, what a rational CLEC would consider when deciding how to serve
6 a customer with multiple POTS lines.

7
8 As SBC is aware, the overall costs to provision service with UNE-L are higher
9 than the costs to provision UNE-P.³⁹ In Mr. Fleming's analysis, he compares the
10 costs of a single DS1 service to the costs of a single UNE-L service. Since SBC's
11 goal appears to be to set the cross over point as low as possible, SBC's "game" is
12 to set the DS1 costs as low as possible and set the multiple POTS line costs as
13 high as possible. As I will demonstrate in this testimony, Mr. Fleming's analysis
14 does both. Mr. Fleming use the higher UNE-L costs, rather than the lower UNE-
15 P costs to accomplish the goal of setting the multiple POTS lines as high as
16 possible.

17
18 The use of UNE-L as the basis of comparison resulted in Mr. Fleming calculating
19 a "DLC Savings per DS0" of \$17.39 per year.⁴⁰ He then uses those savings as an
20 offset to the DS1 costs. If Mr. Fleming used the less expensive, more appropriate
21 UNE-P option, that savings would not be applicable and the DS1 costs would rise
22 accordingly. Mr. Fleming's use of UNE-L also required the addition of UNE-L

³⁹ It should be noted that Mr. Fleming's UNE-L analysis does not include the costs of collocation space, switching or backhaul.

⁴⁰ Fleming Direct Testimony, Schedule GAF-6, p. 6.

1 hot cut costs. Once again, if Mr. Fleming used the less expensive UNE-P costs,
2 the multiple POTS line costs would be lower.
3

4 **Q. WHAT IS THE FOURTH SIGNIFICANT FLAW IN MR. FLEMING'S**
5 **ANALYSIS?**

6 A. A fourth significant flaw is that SBC's analysis understates the cost of providing a
7 DS1-based service. I visited the web pages that were the basis of Mr. Fleming's
8 Adtran 850 equipment prices and it appears that Mr. Fleming's configuration does
9 not include any costs for battery backup. I have attached a copy of the
10 Nextag.com and CDW.com web pages on Adtran 850 pricing to this testimony as
11 Exhibit JFF-11. Mr. Fleming identified a price range from NexTag.com of
12 \$1,008.00 to \$1,220.00 and a price of \$1,569.63 from CDW.com for an Adtran
13 850 chassis bundle. As can be seen on page 2 of Exhibit JFF-11, the Adtran
14 TA850 AC Chassis Bundle w/PSU BCU L2 & AC Charger price range is \$1,028
15 to \$1,213.00 from NexTag.com. On page 3 of Exhibit JFF-11 can be seen an
16 Adtran 850 unit with a price of \$1,569.63 from CDW.com. Neither configuration
17 in NexTag.com nor CDW.com includes the battery backup. As can be seen on
18 page 1 of Exhibit JFF-11, the NexTag.com prices for an Adtran TA750/850
19 Standalone Battery Back-Up System ranges from \$255.00 to \$332.00. These
20 prices are consistent with the prices I used in my cross over analysis.
21

22 As I discussed in my Direct Testimony, the absence of a battery backup would
23 leave the customer without telephone service in the event of an electric power

1 outage.⁴¹ In contrast, a customer with multiple POTS lines would not lose
2 telephone service during a commercial power outage. To ensure that the
3 customer's telephone service is at least as good with a DS1-based service as with
4 multiple POTS lines, it is imperative that the Adtran 850 equipment include the
5 battery backup system.

6

7 Mr. Fleming's analysis is also flawed in that he did not include any costs for the
8 CLEC to install the channel bank equipment at the customer's premises. As I
9 discuss earlier in this testimony, Adtran would charge \$375.00 for a remote
10 installation. In a remote installation, Adtran does not send an installer to the
11 customer's premises. Instead, an Adtran technician would be on the telephone
12 assisting the person that is doing the actual installation. If Adtran were to send a
13 technician to the customer's premises to install the unit, the cost would be
14 \$990.00. While my analysis conservatively used a less expensive installation
15 cost, there clearly is a cost incurred by the CLEC to install the equipment at the
16 customer's premises. Mr. Fleming's failure to include that cost is a significant
17 flaw and results in an understatement of the DS1 costs.

18

19 In addition, Mr. Fleming failed to include any costs for maintenance of the
20 equipment or its removal after the customer has left the provider.

21

⁴¹ Finnegan Direct Testimony, pp.15 – 17.

1 **Q. WHAT IS THE FIFTH MAJOR FLAW IN MR. FLEMING’S ANALYSIS?**

2 A. A fifth major flaw in Mr. Fleming’s analysis is he failed to include in the DS1
3 costs the non-recurring and recurring costs of the DS1 cross connection and the
4 central office access charge. SBC charges CLECs a non-recurring and recurring
5 monthly rate for the connection between the SBC main distribution frame and the
6 CLEC’s collocation. SBC also charges CLECs a central office access charge
7 when its technicians perform installation work in an SBC central office. As I
8 pointed out in my Direct Testimony, the recurring cost of a cross connection for a
9 DS1 unbundled loop is \$9.00 and the nonrecurring cost is \$45.03.⁴² Mr.
10 Fleming’s analysis should have included this charge.

11

12 **Q. WHAT IS THE SIXTH MAJOR FLAW IN MR. FLEMING’S ANALYSIS?**

13 A. The sixth major flaw in Mr. Fleming’s analysis is that he did not include any costs
14 for backhaul, switching, and transport in the DS1 costs. This failure resulted in an
15 understatement of the DS1 costs. Backhaul costs to a CLEC’s switch, the actual
16 switch costs and the costs of transporting traffic into and from the CLEC’s switch
17 are all costs the factor into the economies of providing a DS1-based service. My
18 analysis includes those costs.

19

⁴² M2A Appendix Pricing UNE, Schedule of Prices, June 27, 2003.

**Q. WHAT IS THE SEVENTH SIGNIFICANT FLAW IN MR. FLEMING'S
APPROACH?**

A. The seventh significant flaw in Mr. Fleming's approach is that he understated the churn rate. Mr. Fleming used a churn rate of 1% per month.⁴³ Using this churn rate, Mr. Fleming amortized the DS1-related non-recurring costs over a ten-year period. It is unreasonable to believe that a customer is going to stay with a provider for ten years. The unreasonableness of assuming a customer will stay with a CLEC for ten years is underscored by SBC's winback rates for local access lines as SBC reported them to the financial community. SBC touted its success with winbacks to the financial community, stating "SBC's consumer winback rate improved to 52 percent in the second quarter, up more than 1,000 basis points from the first quarter this year and double its consumer winback rate in the second quarter of 2002."⁴⁴ SBC also bragged "SBC's business winback rate also topped 50 percent in the second quarter."⁴⁵ SBC has also previously stated that its winback rates for both consumer and business in states where it enjoys the ability to offer long distance services (such as Missouri) is greater than 50%.⁴⁶ An SBC assumption that a CLEC will maintain a customer for ten years flies directly in the face of the guidance SBC has been providing to the financial community. It is hard to see how a CLEC can maintain a customer for ten years if SBC is winning back over half of its business customers that were lost to CLECs.

⁴³ Fleming Direct Testimony, Schedule GSF-6, p. 7.

⁴⁴ SBC Investor Briefing, July 24, 2003, No. 237, p. 6.

⁴⁵ Id.

⁴⁶ SBC Investor Briefing, October 24, 2002, No. 233, p. 5.

1 **Q. EVEN WITH THE NUMEROUS FLAWS IN THE ANALYSIS, WHAT**
2 **DOES MR. FLEMING’S ANALYSIS SHOW?**

3 A. Even with all of its flaws, Mr. Fleming’s analysis shows a cross over point that is
4 much higher than the four lines it is recommending this Commission adopt.
5 Notwithstanding that Mr. Fleming understated the DS1 related costs and
6 overstated the POTS costs, using Mr. Fleming’s costs without adjustment results
7 in a cross over point that is much higher than four lines. The below table shows
8 the cross over result obtained if the SBC’s calculated DS1 costs are divided by the
9 SBC’s calculated UNE-L costs.

SBC Proposed Costs⁴⁷	Zone 1	Zone 2	Zone 3	Zone 4
DS1	\$164.09	\$168.48	\$170.13	\$164.28
UNE-L	\$13.82	\$19.75	\$20.85	\$17.52
Cross Over Point	11.87	8.5	8.15	9.37

10
11 If all of the appropriate DS1 costs were included, a more reasonable churn rate
12 was employed and the POTS analysis used UNE-P instead of UNE-L, the SBC
13 analysis would produce a cross over point much closer to the thirteen line
14 recommendation that I made in my Direct Testimony.

15
16 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

17 A. Yes, it does.

⁴⁷ Fleming Direct Testimony, Schedule GAF-6, p. 9

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

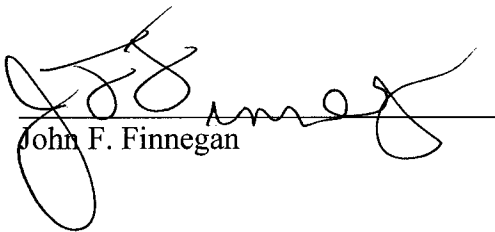
In the Matter of a Commission Inquiry into)
The Possibility of Impairment without)
Unbundled Local Circuit Switching When)
Serving the Mass Market)

Case No. TO-2004-0207

AFFIDAVIT OF JOHN F. FINNEGAN

I, John F. Finnegan, being duly sworn, state that I am a Senior Policy Witness for the AT&T. I have participated in the preparation of the attached Rebuttal Testimony in question and answer form to be presented in this case, and the answers were given by me. I have knowledge of the matters set forth in such answers and that such answers are true and correct to the best of my knowledge and belief.

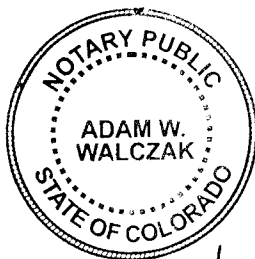
Dated this 16th day of January 2004.


John F. Finnegan

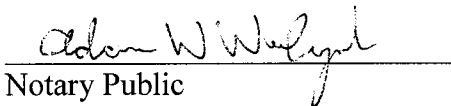
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COUNTY AND COUNTY OF DENVER)

SUBSCRIBED AND SWORN TO before me this 16th day of January 2004 by John F. Finnegan who certifies that the foregoing is true and correct to best of his knowledge and belief.

Witness my hand and official seal.



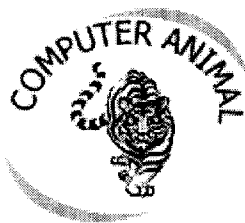
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Product Info

Manufacturer AdTran
 Manufacturer Part# 4175001L6#AC
 Product Group Network- Multislot Chassis
 Category Channel Bank/DSU/CSU
 Sub-Category Chassis/Module Bundle (AC)

Product Specifications

Manufacturer Part#	4175001L6#AC
Manufacturer	ADTRAN
Type Device	Channel Bank
Network Type	WAN
Management	None
Form Factor/Mounting	Standalone
Form Factor/Mounting	Chassis
Form Factor/Mounting	Rack-Mountable
Number/Type of Port 1	(1) RJ48C T1
Max Number of Port 1	(1) RJ48C T1
Total Number of Channels	24
Supported Module Types	Quad FXS
Supported Module Types	Quad FXO
Supported Module Types	BCU
Supported Module Types	PSU
Supported Module Types	OCU
Supported Module Types	DSU
Total Number of Module Slots	7
Module 1 Included	BCU
Module 2 Included	AC PSU
Module 3 Included	(6) Quad FXS
Number of Available Module Slots	7

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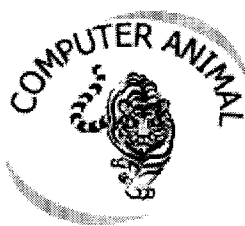
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AdTran MX2800/TA750/TA850 AC P/S W/BATT CHARGER Part#1175043L2



MX2800/TA750/TA850 AC P/S W/BATT CHARGER

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TARIFF F.C.C. NO. 73
15th Revised Page 20-47.7
Cancels 14th Revised Page 20-47.7

ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.3 Interoffice Mileage - Fixed - Monthly Recurring Rates
and Service Extension

(A) <u>Interoffice Fixed - per DS3 or DS3 equivalent - AR - Zone 1</u>					
<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$725.00	\$510.00 (R)	\$400.00 (R)	\$400.00	
(B) <u>Interoffice Fixed - per DS3 or DS3 equivalent - AR - Zone 2</u>					
<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$750.00	\$535.00 (R)	\$410.00 (R)	\$410.00 (R)	
(C) <u>Interoffice Fixed - per DS3 or DS3 equivalent - AR - Zone 3</u>					
<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$775.00	\$550.00 (R)	\$420.00 (R)	\$420.00 (R)	
(D) <u>Interoffice Fixed - per DS3 or DS3 equivalent - KS - Zone 1</u>					
<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$725.00	\$510.00 (R)	\$400.00 (R)	\$400.00	
(E) <u>Interoffice Fixed - per DS3 or DS3 equivalent - KS - Zone 2</u>					
<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$750.00	\$535.00 (R)	\$410.00 (R)	\$410.00 (R)	
(F) <u>Interoffice Fixed - per DS3 or DS3 equivalent - KS - Zone 3</u>					
<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$775.00	\$550.00 (R)	\$420.00 (R)	\$420.00 (R)	

Rates contained in this transmittal are subject to subsequent adjustment, effective retrospectively, in the event the Commission or a court subsequently authorizes Southwestern Bell Telephone Company to correct its rates pursuant to pending motions, or petitions for reconsideration or waiver, or in the event of any other adjustment to an order of the Commission or a court.

(This page filed under Transmittal No. 2952)

Issued: June 16, 2003

Effective: July 1, 2003

One SBC Plaza, Dallas, Texas 75202

ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.3 Interoffice Mileage - Fixed - Monthly Recurring Rates
and Service Extension (Cont'd)(G) Interoffice Fixed - per DS3 or DS3 equivalent - MO - Zone 1

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$725.00	\$510.00(R)	\$400.00(R)	\$400.00

(H) Interoffice Fixed - per DS3 or DS3 equivalent - MO - Zone 2

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$750.00	\$535.00(R)	\$410.00(R)	\$410.00(R)

(I) Interoffice Fixed - per DS3 or DS3 equivalent - MO - Zone 3

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$775.00	\$550.00(R)	\$420.00(R)	\$420.00(R)

(J) Interoffice Fixed - per DS3 or DS3 equivalent - OK - Zone 1

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$725.00	\$510.00(R)	\$400.00(R)	\$400.00

(K) Interoffice Fixed - per DS3 or DS3 equivalent - OK - Zone 2

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$750.00	\$535.00(R)	\$410.00(R)	\$410.00(R)

(L) Interoffice Fixed - per DS3 or DS3 equivalent - OK - Zone 3

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$775.00	\$550.00(R)	\$420.00(R)	\$420.00(R)

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One SBC Plaza, Dallas, Texas 75202

ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.3 Interoffice Mileage - Fixed - Monthly Recurring Rates
and Service Extension (Cont'd)(M) Interoffice Fixed - per DS3 or DS3 equivalent - TX - Zone 1

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$725.00	\$510.00(R)	\$400.00(R)	\$400.00

(N) Interoffice Fixed - per DS3 or DS3 equivalent - TX - Zone 2

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$750.00	\$535.00(R)	\$410.00(R)	\$410.00(R)

(O) Interoffice Fixed - per DS3 or DS3 equivalent - TX - Zone 3

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$775.00	\$550.00(R)	\$420.00(R)	\$420.00(R)

Rates contained in this transmittal are subject to subsequent adjustment, effective retrospectively, in the event the Commission or a court subsequently authorizes Southwestern Bell Telephone Company to correct its rates pursuant to pending motions, or petitions for reconsideration or waiver, or in the event of any other adjustment to an order of the Commission or a court.

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One SBC Plaza, Dallas, Texas 75202

ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.4 Interoffice Mileage - Per Mile - Monthly Recurring Rates and Service Extension(A) Per Mile - per Volume Option, per Mile - AR - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 65.00(R)	\$ 37.50(R)	\$ 37.50(R)
3	1J5HS/1HXL	\$ 300.00	\$ 195.00(R)	\$ 112.50(R)	\$ 112.50(R)
6	1J5HS/1HXL	\$ 600.00	\$ 390.00(R)	\$ 225.00(R)	\$ 225.00(R)
12	1J5HS/1HXL	\$1,200.00	\$ 780.00(R)	\$ 450.00(R)	\$ 450.00(R)

(B) Per Mile - per Volume Option, per Mile - AR - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 70.00(R)	\$ 40.00(R)	\$ 40.00(R)
3	1J5HS/1HXL	\$ 315.00	\$ 210.00(R)	\$ 120.00(R)	\$ 120.00(R)
6	1J5HS/1HXL	\$ 630.00	\$ 420.00(R)	\$ 240.00(R)	\$ 240.00(R)
12	1J5HS/1HXL	\$1,260.00	\$ 840.00(R)	\$ 480.00(R)	\$ 480.00(R)

(C) Per Mile - per Volume Option, per Mile - AR - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 75.00(R)	\$ 42.50(R)	\$ 42.50(R)
3	1J5HS/1HXL	\$ 330.00	\$ 225.00(R)	\$ 127.50(R)	\$ 127.50(R)
6	1J5HS/1HXL	\$ 660.00	\$ 450.00(R)	\$ 255.00(R)	\$ 255.00(R)
12	1J5HS/1HXL	\$1,320.00	\$ 900.00(R)	\$ 510.00(R)	\$ 510.00(R)

* Volume Option specifies the number of DS3s or DS3 equivalents.

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One SBC Plaza, Dallas, Texas 75202

ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.4 Interoffice Mileage - Per Mile - Monthly Recurring Rates and Service Extension (Cont'd)(D) Per Mile - per Volume Option, per Mile - KS - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 65.00(R)	\$ 37.50(R)	\$ 37.50(R)
3	1J5HS/1HXL	\$ 300.00	\$ 195.00(R)	\$ 112.50(R)	\$ 112.50(R)
6	1J5HS/1HXL	\$ 600.00	\$ 390.00(R)	\$ 225.00(R)	\$ 225.00(R)
12	1J5HS/1HXL	\$1,200.00	\$ 780.00(R)	\$ 450.00(R)	\$ 450.00(R)

(E) Per Mile - per Volume Option, per Mile - KS - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 70.00(R)	\$ 40.00(R)	\$ 40.00(R)
3	1J5HS/1HXL	\$ 315.00	\$ 210.00(R)	\$ 120.00(R)	\$ 120.00(R)
6	1J5HS/1HXL	\$ 630.00	\$ 420.00(R)	\$ 240.00(R)	\$ 240.00(R)
12	1J5HS/1HXL	\$1,260.00	\$ 840.00(R)	\$ 480.00(R)	\$ 480.00(R)

(F) Per Mile - per Volume Option, per Mile - KS - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 75.00(R)	\$ 42.50(R)	\$ 42.50(R)
3	1J5HS/1HXL	\$ 330.00	\$ 225.00(R)	\$ 127.50(R)	\$ 127.50(R)
6	1J5HS/1HXL	\$ 660.00	\$ 450.00(R)	\$ 255.00(R)	\$ 255.00(R)
12	1J5HS/1HXL	\$1,320.00	\$ 900.00(R)	\$ 510.00(R)	\$ 510.00(R)

* Volume Option specifies the number of DS3s or DS3 equivalents.

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ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.4 Interoffice Mileage - Per Mile - Monthly Recurring Rates
and Service Extension (Cont'd)(G) Per Mile - per Volume Option, per Mile - MO - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 65.00(R)	\$ 37.50(R)	\$ 37.50(R)
3	1J5HS/1HXL	\$ 300.00	\$ 195.00(R)	\$ 112.50(R)	\$ 112.50(R)
6	1J5HS/1HXL	\$ 600.00	\$ 390.00(R)	\$ 225.00(R)	\$ 225.00(R)
12	1J5HS/1HXL	\$1,200.00	\$ 780.00(R)	\$ 450.00(R)	\$ 450.00(R)

(H) Per Mile - per Volume Option, per Mile - MO - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 70.00(R)	\$ 40.00(R)	\$ 40.00(R)
3	1J5HS/1HXL	\$ 315.00	\$ 210.00(R)	\$ 120.00(R)	\$ 120.00(R)
6	1J5HS/1HXL	\$ 630.00	\$ 420.00(R)	\$ 240.00(R)	\$ 240.00(R)
12	1J5HS/1HXL	\$1,260.00	\$ 840.00(R)	\$ 480.00(R)	\$ 480.00(R)

(I) Per Mile - per Volume Option, per Mile - MO - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 75.00(R)	\$ 42.50(R)	\$ 42.50(R)
3	1J5HS/1HXL	\$ 330.00	\$ 225.00(R)	\$ 127.50(R)	\$ 127.50(R)
6	1J5HS/1HXL	\$ 660.00	\$ 450.00(R)	\$ 255.00(R)	\$ 255.00(R)
12	1J5HS/1HXL	\$1,320.00	\$ 900.00(R)	\$ 510.00(R)	\$ 510.00(R)

* Volume Option specifies the number of DS3s or DS3 equivalents.

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ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.4 Interoffice Mileage - Per Mile - Monthly Recurring Rates and Service Extension (Cont'd)(J) Per Mile - per Volume Option, per Mile - OK - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 65.00(R)	\$ 37.50(R)	\$ 37.50(R)
3	1J5HS/1HXL	\$ 300.00	\$ 195.00(R)	\$ 112.50(R)	\$ 112.50(R)
6	1J5HS/1HXL	\$ 600.00	\$ 390.00(R)	\$ 225.00(R)	\$ 225.00(R)
12	1J5HS/1HXL	\$1,200.00	\$ 780.00(R)	\$ 450.00(R)	\$ 450.00(R)

(K) Per Mile - per Volume Option, per Mile - OK - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 70.00(R)	\$ 40.00(R)	\$ 40.00(R)
3	1J5HS/1HXL	\$ 315.00	\$ 210.00(R)	\$ 120.00(R)	\$ 120.00(R)
6	1J5HS/1HXL	\$ 630.00	\$ 420.00(R)	\$ 240.00(R)	\$ 240.00(R)
12	1J5HS/1HXL	\$1,260.00	\$ 840.00(R)	\$ 480.00(R)	\$ 480.00(R)

(L) Per Mile - per Volume Option, per Mile - OK - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 75.00(R)	\$ 42.50(R)	\$ 42.50(R)
3	1J5HS/1HXL	\$ 330.00	\$ 225.00(R)	\$ 127.50(R)	\$ 127.50(R)
6	1J5HS/1HXL	\$ 660.00	\$ 450.00(R)	\$ 255.00(R)	\$ 255.00(R)
12	1J5HS/1HXL	\$1,320.00	\$ 900.00(R)	\$ 510.00(R)	\$ 510.00(R)

* Volume Option specifies the number of DS3s or DS3 equivalents.

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ACCESS SERVICE

20. MegaLink Custom Services (Cont'd)20.5 Rates and Charges (Cont'd)20.5.4 Interoffice Mileage - Per Mile - Monthly Recurring Rates
and Service Extension (Cont'd)(M) Per Mile - per Volume Option, per Mile - TX - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 65.00(R)	\$ 37.50(R)	\$ 37.50(R)
3	1J5HS/1HXL	\$ 300.00	\$ 195.00(R)	\$ 112.50(R)	\$ 112.50(R)
6	1J5HS/1HXL	\$ 600.00	\$ 390.00(R)	\$ 225.00(R)	\$ 225.00(R)
12	1J5HS/1HXL	\$1,200.00	\$ 780.00(R)	\$ 450.00(R)	\$ 450.00(R)

(N) Per Mile - per Volume Option, per Mile - TX - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 70.00(R)	\$ 40.00(R)	\$ 40.00(R)
3	1J5HS/1HXL	\$ 315.00	\$ 210.00(R)	\$ 120.00(R)	\$ 120.00(R)
6	1J5HS/1HXL	\$ 630.00	\$ 420.00(R)	\$ 240.00(R)	\$ 240.00(R)
12	1J5HS/1HXL	\$1,260.00	\$ 840.00(R)	\$ 480.00(R)	\$ 480.00(R)

(O) Per Mile - per Volume Option, per Mile - TX - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 75.00(R)	\$ 42.50(R)	\$ 42.50(R)
3	1J5HS/1HXL	\$ 330.00	\$ 225.00(R)	\$ 127.50(R)	\$ 127.50(R)
6	1J5HS/1HXL	\$ 660.00	\$ 450.00(R)	\$ 255.00(R)	\$ 255.00(R)
12	1J5HS/1HXL	\$1,320.00	\$ 900.00(R)	\$ 510.00(R)	\$ 510.00(R)

* Volume Option specifies the number of DS3s or DS3 equivalents.

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One SBC Plaza, Dallas, Texas 75202

ACCESS SERVICE

38. Managed Value Plan (MVP) (Cont'd)38.3 MVP Terms and Conditions (Cont'd)(E) MVP Billing Discounts (Cont'd)(3) MVP Commitment Discounts

The MVP Commitment Discount follows:

	YR 1	YR 2	YR 3	YR 4	YR 5
MVP Commitment Discount	9%	11%	12%	13%	14%

The MVP commitment discount is applied monthly, for those months where the criteria is met. If the customer does not receive the monthly commitment discount, it may still receive the discount, if it is in compliance with Section 38.3 by the contract anniversary date, through the true-up process described in 38.3(H).

(x)

Example 1:

A customer is in Year 1 of its MVP agreement. Its MARC is established at \$12 million, per the guidelines in 38.3(C)(1), preceding. The customer achieves a qualified monthly billing of \$1.07 million and has an Access Ratio of 97.53%.

The customer's MVP Commitment Discount is equal to \$90,000, calculated as follows:

Annual MARC = \$12M
 Monthly MARC = \$12M / 12 months = \$1M
 Monthly MARC achievement = \$1.07M
 MVP Commitment Discount = 9%
 MVP Monthly Credit = \$1.0M * .09 = \$90,000

Example 2:

A customer is in Year 3 of its MVP agreement. Its MARC is established at \$12 million, per the guidelines in 38.3(C)(1), preceding. The customer achieves a qualified monthly billing amount of \$1.18 million and has an Access Ratio of 96.8%.

The customer's MVP Commitment Discount is equal to \$120,000, calculated as follows:

Annual MARC = \$12M
 Monthly MARC = \$12M / 12 months = \$1M
 Monthly MARC achievement = \$1.18M
 MVP Commitment Discount = 12%
 MVP Monthly Credit = \$1.0M * .12 = \$120,000

x Issued under authority of Special Permission No. 02-052 of the F.C.C. in order to restore currently effective provisions and to withdraw material filed under Transmittal No. 2883 without becoming effective.

(This page filed under Transmittal No. 2892)

ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd)39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(C) Interoffice Mileage Fixed Monthly-Recurring Rate and Service Extension

(1) <u>Interoffice Fixed - per DS3 or DS3 equivalent - AR - Zone 1</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$725.00(R)	\$550.00(R)	\$450.00(R)	\$450.00(R)	
(2) <u>Interoffice Fixed - per DS3 or DS3 equivalent - AR - Zone 2</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$750.00(R)	\$575.00(R)	\$475.00(R)	\$475.00(R)	
(3) <u>Interoffice Fixed - per DS3 or DS3 equivalent - AR - Zone 3</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$775.00(R)	\$600.00(R)	\$500.00(R)	\$500.00(R)	
(4) <u>Interoffice Fixed - per DS3 or DS3 equivalent - KS - Zone 1</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$725.00(R)	\$550.00(R)	\$450.00(R)	\$450.00(R)	
(5) <u>Interoffice Fixed - per DS3 or DS3 equivalent - KS - Zone 2</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$750.00(R)	\$575.00(R)	\$475.00(R)	\$475.00(R)	
(6) <u>Interoffice Fixed - per DS3 or DS3 equivalent - KS - Zone 3</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$775.00(R)	\$600.00(R)	\$500.00(R)	\$500.00(R)	
(7) <u>Interoffice Fixed - per DS3 or DS3 equivalent - MO - Zone 1</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$725.00(R)	\$550.00(R)	\$450.00(R)	\$450.00(R)	
(8) <u>Interoffice Fixed - per DS3 or DS3 equivalent - MO - Zone 2</u>					
	<u>Month to</u>				
<u>USOC</u>	<u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>	
10XHX/10XLX	\$750.00(R)	\$575.00(R)	\$475.00(R)	\$475.00(R)	

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ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd))39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(C) Interoffice Mileage - Fixed - Monthly Recurring Rate and Service Extension (Cont'd)(9) Interoffice Fixed - per DS3 or DS3 equivalent - MO - Zone 3

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$775.00(R)	\$600.00(R)	\$500.00(R)	\$500.00(R)

(10) Interoffice Fixed - per DS3 or DS3 equivalent - OK - Zone 1

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$725.00(R)	\$550.00(R)	\$450.00(R)	\$450.00(R)

(11) Interoffice Fixed - per DS3 or DS3 equivalent - OK - Zone 2

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$750.00(R)	\$575.00(R)	\$475.00(R)	\$475.00(R)

(12) Interoffice Fixed - per DS3 or DS3 equivalent - OK - Zone 3

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$775.00(R)	\$600.00(R)	\$500.00(R)	\$500.00(R)

(13) Interoffice Fixed - per DS3 or DS3 equivalent - TX - Zone 1

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$725.00(R)	\$550.00(R)	\$450.00(R)	\$450.00(R)

(14) Interoffice Fixed - per DS3 or DS3 equivalent - TX - Zone 2

<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$750.00(R)	\$575.00(R)	\$475.00(R)	\$475.00(R)

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ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd)39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(C) Interoffice Mileage - Fixed - Monthly Recurring Rate and Service Extension (Cont'd)(15) Interoffice Fixed - per DS3 or DS3 equivalent - TX - Zone 3

<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
10XHX/10XLX	\$775.00(R)	\$600.00(R)	\$500.00(R)	\$500.00(R)

(16) Temp-DS3 - Interoffice Fixed - per Temp DS3 - AR - Zone 1

<u>USOC</u>	<u>Monthly</u>
10XGX	\$750.00(R)

(17) Temp-DS3 - Interoffice Fixed - per Temp DS3 - AR - Zone 2

<u>USOC</u>	<u>Monthly</u>
10XGX	\$775.00(R)

(18) Temp-DS3 - Interoffice Fixed - per Temp DS3 - AR - Zone 3

<u>USOC</u>	<u>Monthly</u>
10XGX	\$800.00(R)

(19) Temp-DS3 - Interoffice Fixed - per Temp DS3 - KS - Zone 1

<u>USOC</u>	<u>Monthly</u>
10XGX	\$750.00(R)

(20) Temp-DS3 - Interoffice Fixed - per Temp DS3 - KS - Zone 2

<u>USOC</u>	<u>Monthly</u>
10XGX	\$775.00(R)

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One Bell Plaza, Dallas, Texas 75202

ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd)39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(D) Interoffice Mileage - Per Mile - Monthly
Recurring Rate and Service Extension(1) Per Mile - per Volume Option, per Mile - AR - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 70.00	\$ 45.00	\$ 45.00
3	1J5HS/1HXL	\$ 300.00	\$ 210.00	\$ 135.00	\$ 135.00
6	1J5HS/1HXL	\$ 600.00	\$ 420.00	\$ 270.00	\$ 270.00
12	1J5HS/1HXL	\$1,200.00	\$ 840.00	\$ 540.00	\$ 185.00

(2) Per Mile - per Volume Option, per Mile - AR - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 75.00	\$ 50.00	\$ 50.00
3	1J5HS/1HXL	\$ 315.00	\$ 225.00	\$ 150.00	\$ 150.00
6	1J5HS/1HXL	\$ 630.00	\$ 450.00	\$ 300.00	\$ 300.00
12	1J5HS/1HXL	\$1,260.00	\$ 900.00	\$ 600.00	\$ 160.00

(3) Per Mile - per Volume Option, per Mile - AR - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 80.00	\$ 55.00	\$ 55.00
3	1J5HS/1HXL	\$ 330.00	\$ 240.00	\$ 165.00	\$ 165.00
6	1J5HS/1HXL	\$ 660.00	\$ 480.00	\$ 330.00	\$ 330.00
12	1J5HS/1HXL	\$1,320.00	\$ 960.00	\$ 660.00	\$ 150.00

(4) Per Mile - per Volume Option, per Mile - KS - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 70.00	\$ 45.00	\$ 45.00
3	1J5HS/1HXL	\$ 300.00	\$ 210.00	\$ 135.00	\$135.00
6	1J5HS/1HXL	\$ 600.00	\$ 420.00	\$ 270.00	\$270.00
12	1J5HS/1HXL	\$1,200.00	\$ 840.00	\$ 540.00	\$185.00

* Volume Option specifies the number of DS3s or DS3 equivalents.

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One Bell Plaza, Dallas, Texas 75202

ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd)39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(D) Interoffice Mileage - Per Mile - Monthly
Recurring Rate and Service Extension (Cont'd)(5) Per Mile - per Volume Option, per Mile - KS - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 75.00	\$ 50.00	\$ 50.00
3	1J5HS/1HXL	\$ 315.00	\$ 225.00	\$ 150.00	\$150.00
6	1J5HS/1HXL	\$ 630.00	\$ 450.00	\$ 300.00	\$300.00
12	1J5HS/1HXL	\$1,260.00	\$ 900.00	\$ 600.00	\$160.00

(6) Per Mile - per Volume Option, per Mile - KS - Zone 3

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 80.00	\$ 55.00	\$ 55.00
3	1J5HS/1HXL	\$ 330.00	\$ 240.00	\$ 165.00	\$ 165.00
6	1J5HS/1HXL	\$ 660.00	\$ 480.00	\$ 330.00	\$ 330.00
12	1J5HS/1HXL	\$1,320.00	\$ 960.00	\$ 660.00	\$ 150.00

(7) Per Mile - per Volume Option, per Mile - MO - Zone 1

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 100.00	\$ 70.00	\$ 45.00	\$ 45.00
3	1J5HS/1HXL	\$ 300.00	\$ 210.00	\$ 135.00	\$135.00
6	1J5HS/1HXL	\$ 600.00	\$ 420.00	\$ 270.00	\$270.00
12	1J5HS/1HXL	\$1,200.00	\$ 840.00	\$ 540.00	\$185.00

(8) Per Mile - per Volume Option, per Mile - MO - Zone 2

<u>Volume Option*</u>	<u>USOC</u>	<u>Month to Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 75.00	\$ 50.00	\$ 50.00
3	1J5HS/1HXL	\$ 315.00	\$225.00	\$150.00	\$150.00
6	1J5HS/1HXL	\$ 630.00	\$450.00	\$300.00	\$300.00
12	1J5HS/1HXL	\$1,260.00	\$900.00	\$600.00	\$160.00

* Volume Option specifies the number of DS3s or DS3 equivalents.

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One Bell Plaza, Dallas, Texas 75202

ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd)39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(D) Interoffice Mileage - Per Mile - Monthly
Recurring Rate and Service Extension (Cont'd)(9) Per Mile - per Volume Option, per Mile - MO - Zone 3

Volume Option*	USOC	Month to Month	3 year	5 year	10 year
1	1J5HS/1HXL	\$ 110.00	\$ 80.00	\$ 55.00	\$ 55.00
3	1J5HS/1HXL	\$ 330.00	\$240.00	\$165.00	\$165.00
6	1J5HS/1HXL	\$ 660.00	\$480.00	\$330.00	\$330.00
12	1J5HS/1HXL	\$1,320.00	\$960.00	\$660.00	\$150.00

(10) Per Mile - per Volume Option, per Mile - OK - Zone 1

Volume Option*	USOC	Month to Month	3 year	5 year	10 year
1	1J5HS/1HXL	\$ 100.00(R)	\$ 70.00	\$ 45.00	\$ 45.00
3	1J5HS/1HXL	\$ 300.00(R)	\$210.00	\$135.00	\$135.00
6	1J5HS/1HXL	\$ 600.00(R)	\$420.00	\$270.00	\$270.00
12	1J5HS/1HXL	\$1,200.00(R)	\$840.00	\$540.00	\$185.00

(11) Per Mile - per Volume Option, per Mile - OK - Zone 2

Volume Option*	USOC	Month to Month	3 year	5 year	10 year
1	1J5HS/1HXL	\$ 105.00(R)	\$ 75.00	\$ 50.00	\$ 50.00
3	1J5HS/1HXL	\$ 315.00(R)	\$225.00	\$150.00	\$150.00
6	1J5HS/1HXL	\$ 630.00(R)	\$450.00	\$300.00	\$300.00
12	1J5HS/1HXL	\$1,260.00(R)	\$900.00	\$600.00	\$160.00

(12) Per Mile - per Volume Option, per Mile - OK - Zone 3

Volume Option*	USOC	Month to Month	3 year	5 year	10 year
1	1J5HS/1HXL	\$ 110.00(R)	\$ 80.00	\$ 55.00	\$ 55.00
3	1J5HS/1HXL	\$ 330.00(R)	\$240.00	\$165.00	\$165.00
6	1J5HS/1HXL	\$ 660.00(R)	\$480.00	\$330.00	\$330.00
12	1J5HS/1HXL	\$1,320.00(R)	\$960.00	\$660.00	\$150.00

(13) Per Mile - per Volume Option, per Mile - TX - Zone 1

Volume Option*	USOC	Month to Month	3 year	5 year	10 year
1	1J5HS/1HXL	\$ 100.00	\$ 70.00	\$ 45.00	\$ 45.00
3	1J5HS/1HXL	\$ 300.00	\$ 210.00	\$ 135.00	\$135.00
6	1J5HS/1HXL	\$ 600.00	\$ 420.00	\$ 270.00	\$270.00
12	1J5HS/1HXL	\$1,200.00	\$ 840.00	\$ 540.00	\$185.00

* Volume Option specifies the number of DS3s or DS3 equivalents.

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Issued: May 15, 2001

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One Bell Plaza, Dallas, Texas 75202

(N)

(N)

ACCESS SERVICE

39. Metropolitan Statistical Area Access Services (Cont'd)39.5 Rates and Charges (Cont'd)39.5.2 Special Access Service (Cont'd)39.5.2.12 MegaLink Custom Services (Cont'd)(D) Interoffice Mileage - Per Mile - Monthly
Recurring Rate and Service Extension (Cont'd)(14) Per Mile - per Volume Option, per Mile - TX - Zone 2

<u>Volume</u> <u>Option*</u>	<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 105.00	\$ 75.00	\$ 50.00	\$ 50.00
3	1J5HS/1HXL	\$ 315.00	\$ 225.00	\$ 150.00	\$150.00
6	1J5HS/1HXL	\$ 630.00	\$ 450.00	\$ 300.00	\$300.00
12	1J5HS/1HXL	\$1,260.00	\$ 900.00	\$ 600.00	\$160.00

(15) Per Mile - per Volume Option, per Mile - TX - Zone 3

<u>Volume</u> <u>Option*</u>	<u>USOC</u>	<u>Month to</u> <u>Month</u>	<u>3 year</u>	<u>5 year</u>	<u>10 year</u>
1	1J5HS/1HXL	\$ 110.00	\$ 80.00	\$ 55.00	\$ 55.00
3	1J5HS/1HXL	\$ 330.00	\$ 240.00	\$ 165.00	\$165.00
6	1J5HS/1HXL	\$ 660.00	\$ 480.00	\$ 330.00	\$330.00
12	1J5HS/1HXL	\$1,320.00	\$ 960.00	\$ 660.00	\$150.00

(16) Temp-DS3 - Per Mile - per Temp-DS3, per mile - AR -
Zone 1

<u>Volume</u> <u>Option*</u>	<u>USOC</u>	<u>Monthly</u>
1	1A8GS	\$125.00

(17) Temp-DS3 - Per Mile - per Temp-DS3, per mile - AR -
Zone 2

<u>Volume</u> <u>Option*</u>	<u>USOC</u>	<u>Monthly</u>
1	1A8GS	\$130.00

(18) Temp-DS3 - Per Mile - per Temp-DS3, per mile - AR -
Zone 3

<u>Volume</u> <u>Option*</u>	<u>USOC</u>	<u>Monthly</u>
1	1A8GS	\$135.00

(19) Temp-DS3 - Per Mile - per Temp-DS3, per mile - KS -
Zone 1

<u>Volume</u> <u>Option*</u>	<u>USOC</u>	<u>Monthly</u>
1	1A8GS	\$125.00

* Volume Option specifies the number of DS3s or DS3 equivalents.

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Issued: May 15, 2001

Effective: May 16, 2001

One Bell Plaza, Dallas, Texas 75202

(N)

(N)



Southwestern Bell	State: MO
SOUTHWESTERN BELL-MISSOURI	

		Zone 1	Zone 2	Zone 3	Zone 4
UNE-P					
Cost	Loop	\$ 12.71	\$ 18.64	\$ 19.74	\$ 16.41
	Port	\$ 1.74	\$ 1.97	\$ 2.47	\$ 2.25
	Usage	\$ 1.64	\$ 2.01	\$ 2.84	\$ 2.35
	DUF	\$ -	\$ -	\$ -	\$ -
	White Page Delivery	\$ 0.51	\$ 0.22	\$ 0.22	\$ 0.54
	Total	\$ 16.60	\$ 22.84	\$ 25.27	\$ 21.55

Investment			
Customer Premises Equipment ("CPE")			
Purchase Price of a T1 Channel Bank and Battery Backup	\$ 3,161.00		
Discount off of Purchase Price	30%		
Discounted Price of T1 Channel Bank and Battery Backup	\$ 2,212.70		
Network Investment			
Cost Per DS1 for One 1:3 Multiplexer	\$ 107.14		
Network Equipment ACF	0.200		
CLEC Cost of Capital	12.32%		
Monthly DS1 Switching and Transport costs (assuming 12 VGE)	\$ 40.60		
CPE Economic Life	120		
Non Recurring Costs			
Amortization Period for NRC in Months	24		
CPE Installation Costs	Hours	Rate	Total
Total Installation Cost	2	\$ 47.45	\$ 94.89
CPE Removal Costs			
Total Removal Cost	1	\$ 52.25	\$ 52.25
CPE Maintenance Costs			
Frequency of Maintenance Visits in Years	3		
Average Maintenance Visits Per Year	0.3333333		
Travel and Labor Hours per Maintenance Visit	1		
Average Annual Maintenance Cost	Hours	Rate	Total
	0.3333333	\$ 52.25	\$ 17.42
Additional DS1 Marketing Costs (Assuming 12 VGE)	\$ 625.00		\$ -

ACES Quote

Product	Select Product
	TA 750

Installation	Part Number	Price
Remote	1100101L4	375.00
On Site	1100102L4	990.00

Maintenance	Select Plan
	5x8xNBD

	Part Number	Price
1 Year	1100201M6	330.00
3 Year	1100301M6	891.00

Submit To ACES

Note: Installation prices are for services performed during normal business hours with at least 5 business days notification. Please contact the ACES Help Desk for information on additional charges.



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Adtran TA750/850 HINGED BATTERY BACK-UP SYSTEMRating: *No user ratings*Category: [Power Protection & Supplies : UPS](#)

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\$316 to \$392**Compare Prices**

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Adtran Ta750/850 Standalone Battery Back-Up SystemRating: *No user ratings*Category: [Power Protection & Supplies : UPS](#)

MacMall:\$332 CDW:\$320 eCost.com:\$305

\$255 to \$332**Compare Prices**

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Adtran TA850 SINGLE IAD CHASSIS F/VOICE & DATA W/ROUTING ABILITYRating: *No user ratings*Category: [Satellite Communication Products](#)

PCNation:\$351 eCost.com:\$357 MacMall:\$388

\$320 to \$388**Compare Prices**

at 9 Sellers

Adtran TA850 AC CHASSIS BUNDLE W/PSU BCU L1 AC CHARGER 6 QUAD FXS CARDSRating: *No user ratings*Category: [Satellite Communication Products](#)

MacMall:\$1,960 PC Mall:\$1,960 eCost.com:\$1,930

\$1,788 to \$1,960**Compare Prices**

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Adtran ta750/850 single e&m/to module f/pbx or analog cross connect appsRating: *No user ratings*Category: [Satellite Communication Products](#)

CDW:\$147 MacMall:\$157 PC Mall:\$157

\$133 to \$157**Compare Prices**

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Adtran TA 750 & 850 QUAD FXO CARD FXO & DPT 50PIN AMP FXO CONNECTIVRating: *No user ratings*Category: [Adapters & Interfaces](#)

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PageComputer:\$54 Buy.com:\$55 CDW:\$61

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Adtran TA750 & 850 QUAD FXS CARD FXS DPO PLAR 50PIN AMP FXS CONNECTRating: *No user ratings*Category: [Satellite Communication Products](#)

MacMall:\$179 PC Mall:\$179 CDW:\$167

\$142 to \$179**Compare Prices**

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Adtran TA850 AC CHASSIS BUNDLE W/PSU RCU AC CHARGER & 3 QUAD FXS CARDSRating: *No user ratings*Category: [Satellite Communication Products](#)

ISTNC:\$1,850 eCost.com:\$2,119 MacMall:\$2,130

\$1,850 to \$2,130**Compare Prices**

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Adtran TA850 DUAL CHASSIS F/RACK MOUNT APPLICATIONSRating: *No user ratings*Category: [Satellite Communication Products](#)

MacMall:\$774 eCost.com:\$712 PC Mall:\$774

\$670 to \$774**Compare Prices**

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CDW:\$769 eCost.com:\$740 MacMall:\$750

\$740 to \$769**Compare Prices**

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**Adtran TA850 AC CHASSIS BUNDLE W/PSU BCU L2 & AC CHARGER**Rating: *No user ratings*Category: [Satelite Communication Products](#)

eCost.com:\$1,115 PC Mall:\$1,213 MacMall:\$1,213

\$1,028 to \$1,213**Compare Prices**

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**Adtran TA850 NX56/64 MODULE TO BE USED W/BCU L1 & L2**Rating: *No user ratings*Category: [Satelite Communication Products](#)

CDW:\$178 MacMall:\$192 PC Mall:\$192

\$157 to \$192**Compare Prices**

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**Adtran TA750/850 AC POWER SUPPLY BATTERY & CHARGER 115 VAC APPS**Rating: *No user ratings*Category: [Power Protection & Supplies : Adapters](#)

CDW:\$186 PROVANTAGE:\$157 Buy.com:\$182

\$157 to \$186**Compare Prices**

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**Adtran TA 750 POWER SUPPLY UNIT SUPPORTS 28/48 VDC APPLICATIONS**Rating: *No user ratings*Category: [Satelite Communication Products](#)

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Adtran 850

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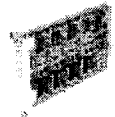









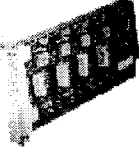







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<input type="checkbox"/>	ADTRAN Total Access 850 AC Chassis Bundle Pre-configured Total Access 850 chassis with Power Supply Unit (PSU) and Router Controller Unit (RCU) AC charger, and three Quad FXS cards	251101	1-2 Weeks	\$2,058.92	<input type="button" value="+"/>
<input type="checkbox"/>	ADTRAN Total Access 850 DC Chassis w/24 FXS Bundle (BCU L1) Total Access 850 Systems	330749	1-2 Weeks	\$1,699.07	<input type="button" value="+"/>
<input type="checkbox"/>	ADTRAN Total Access 850 DC Chassis w/8 FXS Bundle (BCU L1) Includes Adtran part number 1 1175006L1 (PSU), 1 1200375L1 (Chassis), 1 1200373L1 (BCU L1), 6 1175099L1-B (Blank Card), and 2 1175408L2(FXS)	330756	1-2 Weeks	\$1,129.48	<input type="button" value="+"/>
<input type="checkbox"/>	ADTRAN Total Access 850 DC Chassis Bundle Includes one Adtran part number 1175006L1 (PSU), one 1200375L1 (Chassis), one 1200376L1 (T1 RCU) and eight 1175099L1-B (Blank Card)	330757	1-2 Weeks	\$1,409.67	<input type="button" value="+"/>
<input type="checkbox"/>	ADTRAN Total Access 850 T1 RCU Total Access 850 Module	330768	1-2 Weeks	\$869.07	<input type="button" value="+"/>
<input type="checkbox"/>	ADTRAN TA 850 UPGRADE SHELF	447051	4-6 Days	\$1,199.05	<input type="button" value="+"/>

<input type="checkbox"/>	 Image not Available	ADTRAN TA 850 AC CHASIS W/8 FXS RCU	447052	4-6 Days	\$1,909.51	
<input type="checkbox"/>		ADTRAN Total Access 750/850/1500 Quad FXS Module 4-port Foreign Exchange Subscriber (FXS) access module for Total Access (TA) 750, 850 and 1500	247094	4-6 Days	\$167.02	
<input type="checkbox"/>		ADTRAN Total Access 750/850/1500 Single DSO DP Module Single port access module for the TA 750, 850 or 1500 that serves as an interface to the basic DDS DSO (64kbps) signal to a T-carrier line	251105	1-2 Weeks	\$119.61	
<input type="checkbox"/>		ADTRAN Total Access 750/850/1500 Single OCU DP Module Single-port access module that interfaces between a DSO timeslot of the T-carrier data stream and the four-wire metallic to the customers premises.	251109	1-2 Weeks	\$197.76	
<input type="checkbox"/>	 Image not Available	ADTRAN Total Access 750/850/1500 Single U-BR1TE Module Provides an ISDN U-interface and allows the transport of Basic Rate 2B+D information over T1carriers and twisted pair wiring	251115	1-2 Weeks	\$175.75	
<input type="checkbox"/>		ADTRAN Total Access 750/850 Blank Plugs Total Access 750/850 Blank Plugs	257087	4-6 Days	\$16.14	
<input type="checkbox"/>		ADTRAN Total Access 750/850/1500 Quad FXO Module 4-port Foreign Exchange Office (FXO) access module for Total Access (TA) 750, 850 and 1500	257192	4-6 Days	\$229.37	
<input type="checkbox"/>	 Image not Available	ADTRAN Total Access 750/850/1500 Access Modules Total access ear and mouth transmit only dataport	280765	1-2 Weeks	\$146.56	
<input type="checkbox"/>		ADTRAN Total Access 850 Nx56/64 Module Activates the V.35 interface on the rear of the Total Access 850 chassis	292252	1-2 Weeks	\$177.62	
<input type="checkbox"/>		ADTRAN Total Access 750/850 Power Supply Total Access 750/850 Power Supply Unit/Ring Generator	307186	4-6 Days	\$228.97	

<input type="checkbox"/>		ADTRAN Total Access 750/850 Battery Backup System Wallmount Battery Backup System for Total Access 750/850	330480	1-2 Weeks	\$369.51	
<input type="checkbox"/>	 Image not Available	ADTRAN TA750/850 BATTERY B/U SYS	446862	4-6 Days	\$769.10	
<input type="button" value="Compare"/>						

Showing 1 - 19 of 19 products.