

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUN 21 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Rules and Policies)
Governing Pole Attachments)
_____)

CS Docket No. 97-98

**ERRATUM TO PETITION FOR RECONSIDERATION AND
CLARIFICATION OF THE UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTA), through the undersigned, hereby files this *Erratum* to its Petition for Reconsideration and Clarification that was filed in the above-captioned proceeding.¹ USTA's Petition asked for reconsideration and clarification of certain matters decided in the Federal Communications Commission's (FCC) Report and Order² concerning maximum just and reasonable pole attachment rates. The Petition was filed with a one page attachment. The attachment is referenced twice on page 8 of the Petition. The attachment contains several errors that could produce confusion on the part of a reader.

Attached hereto is a corrected attachment. Accompanying the corrected attachment is a one page description of the changes reflected in the corrected attachment. USTA requests that

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¹See Petition for Reconsideration and Clarification of the United States Telecom Association, CS Docket No. 97-98, filed June 16, 2000 (Petition).

²Amendment of Rules and Policies Governing Pole Attachments, CS Docket No. 97-98, FCC 00-116, Report and Order (rel. Apr. 3, 2000).

the FCC place this Erratum and corrected attachment in the record of this proceeding along with USTA's Petition. USTA regrets any inconvenience that may be caused to the FCC or any interested party as a result of the filing of this *Erratum*.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

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June 21, 2000

CORRECTED ATTACHMENT

(Petition for Reconsideration and
Clarification of USTA, CS Docket No. 97-98)

ILLUSTRATIVE EXAMPLE TO CALCULATE NET-BOOK RATE FORMULA

<u>Line</u>	<u>Description</u>	<u>Source</u> ¹	<u>Amount</u>
1.	Total Telephone Plant In Service	Table B1b; Pg2 Row 240; Col af	\$ 15,000,000
2.	Pole Plant In Service	Table B1b; Pg 2 Row 2411; Col af	\$ 300,000
3.	Total Depreciation Reserve	Table B5; Pg 4 Row 490; Col j	\$ 8,000,000
4.	Pole Depreciation Reserve	Table B5; Pg 4 Row 390; Col j	\$ 280,000
5.a.	Net Current Deferred Operating Income Taxes	Table B1a; Pg 3 Row 4100	\$ 25,000
5.b.	Net Non-Current Deferred Operating Income Taxes	Table B1a; Pg 4 Row 4340	\$ 75,000
5.	Total Deferred Operating Income Taxes	Ln 5.a. + Ln 5.b.	\$ 100,000
6.	Total Pole Depreciation Rate	ILEC Book Depreciation Rate	7%
7.	Pole Depr. 'Attributabe" Rate	"100" for life component ²	4%
8.	Pole Depr. 'Removal Costs' Rate	"75" for cost of removal component ²	3%
9.	Pole Percentage of Total Plant	Line 2/Line 1	0.020
10.	Pole Depr. Percentage of Total Plan	Line 4/Line 3	0.035
11.	Pole Depr. Reserve - Applicable	Ln 4 x (Ln 7/Ln6)	\$ 160,000
12.	Pole Deferred FIT – Applicable	Ln 5 x Ln 10 x (Ln 7/Ln6)	\$ 2,000
13.	Net Pole Investment	Ln 2 – Ln 11 – Ln 12	\$ 138,000

¹ References shown in this column are to ARMIS Report 43-02. Absent the ARMIS report, information may be obtained from the accounting books of the ILEC.

² Based on ILEC booked depreciation rates.

Changes to Attachment for Erratum Filing:

Column Headings: Add Footnote 1 to "Source" column heading to indicate that data can be taken from the ILECs' accounting records in the absence of the ARMIS reports.

Line 1: Insert the word "Telephone" in the Description column to match ARMIS report line title.

Lines 1 and 2: Change reference to Table "B-1" to read "B1b." to match ARMIS report indexing.

Line 2: Change reference to Table "B-1" to read "B1b." to match ARMIS report indexing.

Lines 3 and 4:: Change reference to Table "B-5" to read "B5" to match ARMIS report indexing.

Line 5a: Change line description to read "Net Current Deferred Operating Income Taxes" and the source to read Table "B1a." to match ARMIS report titles and indexing.

Line 5b: Change line description to read "Net Non-Current Deferred Operating Income Taxes" and the source to read Table "B1a." to match ARMIS report titles and indexing.

Line 5: Change line description to read "Total Deferred Operating Income Taxes" consistent with Lines 5a and 5b.

Line 6: Change Source column to read "ILEC Book Depreciation Rate" to reflect those instances when the FCC does not regulate the ILECs' depreciation rates.

Lines 7 and 8: In the Source column, replace the "(see note a)" annotation with "Footnote 2" to reflect those instances when the FCC does not regulate the ILECs' depreciation rates.