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OFFICE OF THE SECRETARY

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November 22, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW --
Washington, DC 20554

Re: *Ex parte*, Inter-Carrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68; CC Docket No. 96-98, Local Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

The following responds to arguments by Sprint in its September 18, 2000 *ex parte* submission in the above-referenced proceeding.

In its September 18, 2000 *ex parte* Sprint erroneously asserts that a bifurcated rate structure for traffic subject to reciprocal compensation, including ISP-bound traffic, most accurately captures switch usage costs. Sprint states that switch usage costs consist of two components, call set-up costs, primarily consisting of central processor costs, and call duration costs. Sprint also assumes that switching capacity constraints are a direct result of the capacity limitations of the central processor and therefore concludes that call set-up costs are substantial.

The main flaw in Sprint's position lies in its assumption that switching capacity exhausts as a result of central processor capacity constraints. To the contrary, evidence submitted in state proceedings clearly demonstrate that switches typically will reach capacity *before* central processors exhaust. For example:

1. Sprint's Florida switches' processor utilizations projected at the time the switch is to be replaced range from 74% to 80% *with zero switches forecasted for processor exhaustion*. (Sprint's reply to AT&T's First Set of Interrogatories in Florida Docket No. 980696-TP, attached)

2. A Bell Atlantic New York witness stated "Modern digital switches are designed to be port-limited." (Direct Testimony of J. Gansert in New York Case 95-C-0657, 94-C-0095, 91-C-1174, attached.)

3. Pacific Bell has indicated that somewhere between 80 and 90 percent of its switches exhaust based on line terminations. (Deposition of Pacific Bell's Richard Scholl, Joe Caling, Ray Kwok, and Judith Timmermans, Feb. 11, 1997 in the California OANAD proceeding, p. 77, attached). Mr. Scholl asserted that 80 percent to 90 percent of Pacific Bell's switch exhaust was based on line limitations.

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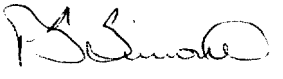
4. Bell Atlantic New York's projected processor utilizations for Manhattan switches at the time of switch replacement are expected to be 24% for 5ESS switches and 18% for DMS switches. (Response to a CLEC Coalition data request numbered CC-BA-100 in Case 98-C-1357, attached.)

Thus, a decision to purchase an additional switch is not contingent upon the capacity of a central processor, but on port capacity exhaust. Port capacity limitations (based on the number of lines that can be connected to a port) are typically reached long before central processor capacity is exhausted. Therefore, the substantial getting started cost of a switch should be allocated to its cost causer – ports. If the central processor and associated getting started costs are allocated appropriately to the port element, and not to a cost in the call set-up charge (central processor cost), then the remaining call set-up cost is trivial. Implementing a bifurcated rate structure where call set-up costs are *de minimis* would be needlessly costly and time consuming and would result in virtually no change in the reciprocal compensation rate.

It is also critical to note that reciprocal compensation rate structures must be tied to unbundled network element rate structures because calls eligible for reciprocal compensation are simply using a series of unbundled network elements (tandem trunk port and switching, tandem to end office transport, and end office trunk port and switching). Today, most states limit reciprocal compensation rates to the sum of the rates established for this series of elements. As unbundled network element rates decline and move closer to true forward-looking costs, reciprocal compensation rates decline as well. Thus, purported claims of CLEC cost over-recovery due to ILEC's inflated unbundled network element rates are temporary.

Even if Sprint's proposed bifurcated rate structure merited serious consideration, the Commission's existing reciprocal compensation rules under Section 215 (b)(5) *already* permit state commissions to establish different reciprocal compensation rate structures, including bifurcated rates, if appropriate. *See* 47 C.F.R. § 51.709 ("a state commission shall establish rates for the transport and termination of local telecommunications traffic that are structured consistently with the manner that carriers incur those costs"). If reflecting call duration-related cost differences in reciprocal compensation rates is indeed worthwhile (which will have to be proven in individual state costs proceedings on the basis of competent evidence), then the solution is to shift to a rate structure that would make reciprocal compensation more economically efficient for all calls, and not single out ISP-bound traffic.

Sincerely,



ATTACHMENTS

cc: D. Attwood
G. Reynolds
J. Jackson
T. Preiss
A. Candeub

Sprint-Florida, Incorporated
Docket No. 980696-TP
AT&T's First Set of Interrogatories
July 10, 1998
Item No. 19

REQUEST: Please provide the following SCIS model input information for Florida, by switch type and location, as utilized in the local switching studies for the proceeding:

1. Percent utilization of the processors
2. Percent fill on lines
3. Percent DLC, by IDCL, by UDLC
4. CCS per trunk
5. Line to trunk ratio by density.

RESPONSE:

1) Refer to the attached document.
2) Refer to attached document.
3) SCIS does not track UDLC in its model output. Refer to the attached document for the percent DLC.
4) Refer to attached document.
5) Sprint does not identify trunk ratio by density. The attached document does provide trunk ratio by wire center.

INFORMATION PROVIDED BY: Kent Dickerson
Director of Cost Support
Regulatory Affairs

FROM AT&T LAW DEPT (TUE) 11. 21' 00 17:25/ST. 17:23/NO. 4862446435 P 12

Attachment 19

SCIS Model Input Information

CLLI		PROCESSOR UTILIZATION			19.2.	19.3.		19.4.	19.5.
		At Cutover	In Fifth Year	At A Switch Replacement	Pct PM On Lines	Pct DLC	Pct DLC by IDLC	CCS Per Trunk	Usage Trunk Ratio
CFVLFLXADS0	Host	0.01%	9.00%	70.00%	95.0%	70.0%	70.0%	21.09	11.45
ALSPFLXA21W	In-Office Remote	32.50%	54.00%	76.00%	95.0%	0.0%	0.0%	N/A	N/A
ALSPFLXADS0	Host	32.50%	54.00%	76.00%	95.0%	27.7%	27.7%	34.54	7.71
APPKFLXADS1	Host	14.50%	33.00%	75.00%	95.0%	35.7%	35.7%	19.63	19.18
ASTRFLXARS0	In-Office Remote	7.00%	14.00%	80.00%	97.0%	14.9%	14.9%	N/A	N/A
BLVWFLXADS0	Host	6.50%	16.00%	80.00%	95.0%	27.1%	23.2%	26.10	19.35
BVHLFLXADS0	Host	4.50%	11.00%	80.00%	90.0%	33.7%	33.7%	28.35	18.38
CHLKFLXARS0	In-Office Remote	2.00%	6.00%	70.00%	95.0%	24.2%	24.2%	N/A	N/A
CLMTFLXADS0	Host	5.00%	15.00%	80.00%	90.0%	41.3%	32.6%	27.90	24.50
CLTNFLXARS0	In-Office Remote	4.50%	11.00%	80.00%	90.0%	36.0%	36.0%	N/A	N/A
CPHZFLXADS0	Host	2.00%	7.00%	80.00%	90.0%	20.8%	20.8%	21.15	13.83
CSLBFLXADS1	Host	6.50%	15.00%	80.00%	90.0%	21.2%	14.3%	30.30	9.48
CYLKFLXADS0	Host	18.00%	57.00%	75.00%	90.0%	0.9%	0.9%	33.06	14.08
DDCYFLXADS1	Host	5.00%	13.00%	80.00%	90.0%	37.5%	23.3%	24.75	22.57
DESTFLXADS0	Host	24.36%	31.00%	80.00%	95.0%	34.9%	34.9%	6.57	10.38
DFSPFLXADS0	Host	3.00%	10.00%	70.00%	95.0%	40.2%	40.2%	26.40	17.03
FRPTFLXARS0	In-Office Remote	3.00%	10.00%	70.00%	90.0%	61.3%	61.3%	N/A	N/A
FTMYFLXADS0	Host	18.50%	46.00%	79.00%	90.0%	6.3%	6.3%	32.07	2.52
FTWBFLXADS0	Host	6.00%	21.00%	70.00%	95.0%	13.4%	13.4%	32.40	9.27
GLDLFLXARS0	In-Office Remote	3.00%	10.00%	70.00%	95.0%	0.0%	0.0%	N/A	N/A
GLRDFLXADS0	Host	18.00%	31.00%	78.00%	90.0%	6.7%	6.7%	28.54	12.54
GNVLFLXARS0	In-Office Remote	2.00%	6.00%	70.00%	95.0%	34.6%	34.6%	N/A	N/A
GVLDFLXARS0	In-Office Remote	5.00%	15.00%	80.00%	95.0%	58.2%	58.2%	N/A	N/A
HMSPFLXARS0	In-Office Remote	4.50%	11.00%	80.00%	97.0%	48.8%	48.8%	N/A	N/A
HOWYFLXARS0	In-Office Remote	27.33%	29.00%	76.00%	85.0%	0.0%	0.0%	N/A	N/A
KSSMFLXDRS0	Host	9.00%	20.00%	80.00%	90.0%	16.1%	16.1%	31.05	8.62
LBLLFLXADS0	Host	4.50%	11.00%	80.00%	95.0%	26.3%	26.3%	20.70	25.07
LEE FLXARS0	In-Office Remote	2.00%	6.00%	70.00%	95.0%	0.0%	0.0%	N/A	N/A
LHACFLXADS0	Host	3.50%	9.00%	80.00%	90.0%	22.2%	22.2%	26.40	20.98
LKBRFLXADS1	Host	23.00%	52.00%	78.00%	90.0%	21.0%	21.0%	29.70	11.66
LKHNFLXARS0	In-Office Remote	8.50%	16.00%	80.00%	97.0%	0.0%	0.0%	N/A	N/A
LKPCFLXARS0	In-Office Remote	9.00%	20.00%	80.00%	90.0%	0.0%	0.0%	N/A	N/A
LSBGFLXADS1	Host	27.33%	29.00%	76.00%	90.0%	8.2%	8.2%	28.31	12.49
MDSNFLXADS0	Host	2.00%	6.00%	70.00%	95.0%	21.2%	21.2%	26.10	15.07
MNTIFLXADS0	Host	0.01%	6.00%	70.00%	95.0%	39.6%	39.6%	27.90	11.46
MRHNFLXARS0	In-Office Remote	4.50%	11.00%	80.00%	90.0%	39.5%	39.5%	N/A	N/A
MTLDFLXADS1	Host	9.00%	30.00%	78.00%	90.0%	49.2%	49.2%	27.18	6.57
NFMYFLXADS0	Host	4.50%	10.00%	80.00%	90.0%	0.0%	0.0%	18.90	10.96
NNPLFLXADS1	Host	10.50%	33.00%	79.00%	90.0%	7.7%	7.7%	31.00	13.91
OCALFLXBDS0	Host	28.00%	48.00%	74.00%	90.0%	13.8%	13.8%	34.75	12.94
ORCYFLXADS0	Host	8.50%	16.00%	80.00%	90.0%	11.7%	11.7%	27.00	14.74
PNLNFLXARS0	In-Office Remote	3.00%	10.00%	70.00%	95.0%	0.0%	0.0%	N/A	N/A
SBNGFLXADS1	Host	9.00%	20.00%	80.00%	95.0%	14.6%	14.6%	25.30	24.02
SGBHFLXARS0	In-Office Remote	24.36%	31.00%	80.00%	95.0%	51.8%	51.8%	N/A	N/A
SHLMFLXADS0	Host	2.50%	9.00%	70.00%	95.0%	0.0%	0.0%	24.75	8.02
SLHLFLXARS0	In-Office Remote	9.00%	20.00%	80.00%	95.0%	0.0%	0.0%	N/A	N/A
SNANFLXARS0	In-Office Remote	5.00%	13.00%	80.00%	90.0%	46.7%	46.7%	N/A	N/A
SNRSFLXARS0	In-Office Remote	24.36%	31.00%	80.00%	95.0%	44.4%	44.4%	N/A	N/A
SSPRFLXARS0	In-Office Remote	28.00%	48.00%	74.00%	95.0%	49.2%	49.2%	N/A	N/A
SVSSFLXARS0	In-Office Remote	6.50%	16.00%	80.00%	97.0%	18.8%	18.8%	N/A	N/A
TLCHFLXARS0	In-Office Remote	5.00%	13.00%	80.00%	90.0%	46.1%	46.1%	N/A	N/A
TLHSFLXADS1	Host	31.00%	66.00%	80.00%	95.0%	0.0%	0.0%	32.48	19.60
TLHSFLXBDS0	Host	34.80%	38.00%	78.00%	95.0%	0.0%	0.0%	29.93	5.81
TLHSFLXCDS0	Host	38.00%	70.00%	70.00%	95.0%	0.0%	0.0%	32.40	5.82
TLHSFLXDDS0	Host	16.00%	50.00%	80.00%	95.0%	0.0%	0.0%	32.40	3.45
TLHSFLXFDS0	Host	20.10%	26.00%	77.00%	95.0%	0.0%	0.0%	25.68	7.65
TLHSFLXHDS0	Host	3.00%	16.00%	70.00%	95.0%	0.0%	0.0%	34.65	5.74
TVRSFLXADS0	Host	7.00%	14.00%	80.00%	95.0%	13.0%	13.0%	30.15	16.71
UMTLFLXARS0	In-Office Remote	7.00%	14.00%	80.00%	90.0%	0.0%	0.0%	N/A	N/A
VLPRFLXADS0	Host	15.48%	17.00%	70.00%	95.0%	15.4%	15.4%	25.75	6.31
VLPRFLXBRS0	In-Office Remote	15.48%	17.00%	70.00%	95.0%	0.0%	0.0%	N/A	N/A
WLWDFLXARS0	In-Office Remote	27.33%	29.00%	76.00%	90.0%	47.7%	47.7%	N/A	N/A
WNDRFLXARS0	In-Office Remote	24.50%	33.00%	75.00%	90.0%	0.0%	0.0%	N/A	N/A
WNPKFLXADS1	Host	29.50%	54.00%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

FROM AT&T LAW DEPT (TUE)11. 21'00 17:25/ST. 17:23/NO. 4862446435 P 13

In many cases, special communications hardware such as conference bridges or tone generators or special recorded messages may be need in conjunction with a software application to provide a service. This special equipment is accessed through the switch fabric as required.

Q. What are the anticipated utilization factors for local switching in a forward-looking network?

A. There are many ways to define utilization in a switch. The proper measure for use in a cost study is one which effectively associates the switches' resources and their cost with the units of consumption. From the perspective of supplying unbundled switching elements, the two units of consumption are the switch ports and the call usage (minutes of use) on those ports. Modern digital switches are designed to be port-limited. That is, enough switch fabric and processor capability is provided so that the normal peak call usage from the anticipated number of working ports, of all types on the switch, can be served within acceptable blocking criteria. Thus, the expected utilization of the usage sensitive capacity of the switch, measured in minutes of use, is effectively 100%. Put another way, there are enough usage-sensitive switch resources (but no more than are necessary) to handle all the minutes of use that the ports are forecasted to deliver in the normal peak period.

FROM AT&T LAW DEPT (TUE) 11. 21' 00 17:25/ST. 17:23/NO. 4862446435 P 11

1 BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION

2

3 IN RE:)
4 OANAD)
5)
6)

7

8

9

10

11

12 VOLUME 1
13 Pages 1 to 182

14 TRANSCRIPT OF PROCEEDINGS RE SCIS

15 DEPOSITIONS OF RICHARD SCHOLL, JOE CALING
RAY KWOK, JUDITH TIMMERMANS

16 Los Angeles, California

17 February 11, 1997

18

19

20

21

22

23

24

25 George A. Haas, CSR No. 5939

FROM AT&T LAW DEPT (TUE)11. 21'00 17:24/ST. 17:23/NO. 4862446435 P 2

BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION

IN RE:

OANAD

TRANSCRIPT OF PROCEEDINGS,
taken on behalf of AT&T at
San Ramon, California,,
commencing at 10:00 A.M.,
Tuesday, February 11, 1997, before
George A. Haas, CSR No. 5939,
pursuant to Stipulation.

FROM AT&T LAW DEPT (TUE)11.21'00 17:24/ST. 17:23/NO. 4862446435 P 3

1 A P P E A R A N C E S:

2

3 FOR AT&T:

4 AT&T CORP.
5 BY: MICHAEL P. HURST, ESQ.
790 Folsom Street
6 Suite 1000
San Francisco, California 94107

7

8 FOR PACIFIC BELL:

9 PACIFIC BELL
BY: TIMOTHY DAWSON, ESQ.
10 Camino Real
San Ramon, California

11

12 FOR MFS INTELENET OF CALIFORNIA:

13 SWIDLER & BERLIN
BY: ANTHONY R. PETRILLA, ESQ.
14 3000 K Street, N.W.
Suite 300
15 Washington, D.C., 20007

16 FOR THE PUBLIC UTILITIES COMMISSION:

17 PUBLIC UTILITIES COMMISSION
18 BY: IRA KALINSKY, ESQ.
505 Van Ness Avenue
19 San Francisco, California 94102

20 ALSO PRESENT:

21 CATHERINE PETZINGER
22 LILA TJOE
TERRI MURRAY
23 SCOTT CRATTY
MARTHA WATSON

24

25

FROM AT&T LAW DEPT (TUE)11.21'00 17:24/ST. 17:23/NO. 4862446435 P 4

1 I N D E X
VOLUME I

2

3 W I T N E S S:

4 JOE CALINGS Page

5

Examination by Mr. Hurst: 10, 89

6

Examination by Mr. Kalinsky: 80

7

8

9 RECORD REQUESTS:

10

PAGE	LINE
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130	22

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16 INFORMATION TO BE MARKED:

17

PAGE	LINE
134	6

18

19

20 EXHIBITS:

21 AT&T Description Identified

22 (NONE)

23

24

25

FROM AT&T LAW DEPT (TUE)11. 21'00 17:24/ST. 17:23/NO. 4862446435 P 5

1 S A N R A M O N, C A L I F O R N I A

2 TUESDAY, FEBRUARY 11, 1997

3 * * * *

4 RICHARD SCHOLL,

5 JOE CALING

6 RAY KWOK,

7 JUDITH TIMMERMANS,

8 having been first duly sworn,

9 were examined and testified as follows:

10

11 EXAMINATION

12 BY MR. HURST:

13 Q. Good morning.

14 For the record, Ray Kwok, Rick

15 Scholl, Joe Caling and Judith Timmermans were sworn

16 in.

17 Have you all done depositions

18 before? These are fairly formally informal. My

19 expectation is that we'll ask questions, and you'll

20 answer them truthfully.

21 If there is a problem with whether

22 the information is admissible as evidence in the

23 case, your lawyer will object, but the answer will

24 go in the record.

25 If at some point we try to put it

FROM AT&T LAW DEPT (TUE)11.21'00 17:24/ST. 17:23/NO. 4862446435 P 6

1 MR. SCHOLL: The usage of the switch
2 doesn't change the price. The size of the switch
3 would be.
4 The way the contract is negotiated is
5 the vendors essentially know the types of switches
6 that Pacific Bell is purchasing and installing, and
7 they have arrived at a per line price regardless of
8 how the switch is equipped. The presumption being
9 if they had assumed a less fully equipped switch in
10 determining their price, they would negotiate a
11 higher price or vice versa.
12 So the effect is we have a single
13 price regardless of how the switch is equipped.
14 It's only as to the number of lines.
15 MR. HURST: That's over the life the
16 contract?
17 MR. SCHOLL: It's over the life of the
18 contract.
19 And in your example about features,
20 most of our switches exhaust on lines. Some
21 exhaust on usage. The way -- if we had, for
22 example, a feature use would increase dramatically
23 in a particular switch. We would effectively have
24 to grow it effectively by adding lines to the
25 switch even though those lines wouldn't be in use.

FROM AT&T LAW DEPT (TUE)11.21'00 17:24/ST. 17:23/NO. 4862446435 P 7

1 So in that sense, you can exhaust a
2 switch on feature just like you would on anything
3 else that uses the switch. But the price we have
4 negotiated is a per line price regardless of how
5 the switch itself is equipped.
6 MR. HURST: Would you say most of your
7 switches exhaust on lines? 80 percent? 90
8 percent?
9 MR. SCHOLL: I don't know. It's a high
10 number. Somewhere in that range, yes, 80 or 90
11 percent.
12 MR. HURST: Could you classify and give a
13 general description of the kind of office that
14 would be potentially exhausting on usage?
15 MR. SCHOLL: Well, an office typically
16 that would exhaust on usage would be one in some
17 location where the per line usage were higher than
18 the norm.
19 MR. HURST: So that might be where,
20 downtown financial district or in a rural area?
21 MR. SCHOLL: I wouldn't think it would be
22 a rural area.
23 MR. HURST: The downtown financial
24 district would have a switch that would exhaust on
25 usage than would not.

FROM AT&T LAW DEPT (TUE)11. 21'00 17:24/ST. 17:23/NO. 4862446435 P 8

1 MR. SCHOLL: It might.

2 MR. HURST: Would there be more than one

3 or two locations in California where that would be

4 true?

5 MR. SCHOLL: I don't know. I'd have to

6 check.

7 I would suspect it would be a small

8 number. I don't know if it's one or two or five or

9 six.

10 MR. HURST: Can you check that?

11 MR. SCHOLL: Sure.

12 MR. HURST: That will be Record Request 3,

13 what switches exhaust on usage.

14 (Ira Kalinsky, Esq. enters

15 the deposition room.)

16 Q. In SCIS, is the main distribution

17 frame cost included in the cost output of MO?

18 A. Yes.

19 Q. Is main distribution frame included

20 in the per line number off the vendor contract?

21 A. Line termination cost, yes.

22 Q. What do you mean by -- I asked if

23 mainframe?

24 A. You mean on the contract itself?

25 Q. Yes.

FROM AT&T LAW DEPT (TUE)11.21'00 17:25/ST. 17:23/NO. 4862446435 P 9

Case: 98-C-1357
CLEC Coalition
Date of Request:
Respondent: BA Panel

CC-BA-100	Please provide a complete description of the "model offices" referred to in Section X.C.1.a. of the Panel Testimony provided by BA-NY's engineering organization for each of the three zones included in BA-NY's loop studies. If any model offices were developed using SCIS/MO for this purpose but were rejected by BA-NY, provide complete descriptions of those as well and explain why they were rejected. Provide all work papers and documentation related to the "model offices" referred to in this request.

RESPONSE:

Please see the response to ATT-BA-41. The model office details can be found on Workpaper Part B-1 Section 43. The model offices were developed by Engineering and then inputted into SCIS. SCIS/MO doesn't develop model offices. They are input by the user. The attached file are the model offices as developed by Engineering.

FROM AT&T LAW DEPT (TUE)11. 21' 00 17:26/ST. 17:23/NO. 4862446435 P 14

SCIS INPUTS - NEW YORK - MANHATTAN

INPUT DESCRIPTION	Forward Looking	
	5ESS	DMS
HOST GENERAL:		
HD/ABS CCS RATIO	1.2	1.2
YEAR SWITCH CUTOVER	2000	2000
PEAK TO AVERAGE BH FACTOR	1.3	1.3
# OF YEARS TO SWITCH REPLACEMENT	15	15
# OF YEARS TO PROCESSOR EXHAUST	5	5
PROCESSOR UTILIZATION AT CUTOVER	11	9
PROCESSOR UTILIZATION AT FIFTH YEAR	16	11
PROCESSOR UTILIZ. AT SWITCH REPLACE	24	18
UPGRADE CPU BEFORE SW. REPLACE	Y	Y
ANALOG LINES:		
NUMBER OF LINES	360	600
ADMINISTRATIVE FILL FACTOR	95	95
ABSBH O+T CCS PER LINE	4	4
ABSBH O+T CALLS PER LINE	3.25	3.25
TR008 INPUTS:		
NUMBER OF LINES	N/A	N/A
ADMINISTRATIVE FILL FACTOR	N/A	N/A
ABSBH O+T CCS PER LINE	N/A	N/A
ABSBH O+T CALLS PER LINE	N/A	N/A
TR-303 INPUTS:		
NUMBER OF LINES	59640	59400
ADMINISTRATIVE FILL FACTOR	93	93
ABSBH O+T CCS PER LINE	4	4
ABSBH O+T CALLS PER LINE	3.25	3.25
RDT CONCENTRATION RATIO	3:1	3:1
NUMBER OF ISDN BRI LINES	1000	1000
ABSBH O+T CCS PER BRI LINE	8	8
DIGITAL TRUNKS:		
NUMBER OF TRUNKS	21,000	21,000
ADMINISTRATIVE FILL FACTOR	95	95
ABSBH O+T CCS PER TRUNK	24	24
ABSBH O+T CALLS PER TRUNK	6	6
SS7:		
INITIAL YEAR SS7 INSTALLATION	2000	2000
ECONOMIC LIFE OF SS7 EQUIPMENT	10	10
INITIAL YEAR LINK PAIR INSTALLATION	2000	2000
LINK PAIR PERCENT UTILIZATION	25	25
SS7 EQUIPMENT AND SIGNALING TYPE	N/A	LPP56
ISDN - PRI:		
NUMBER OF PRI's	75	75
NUMBER OF T-1's PER PRI D CHANNEL	1	1

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