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August 8, 2002

EX PARTE

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

Re: WC Docket 02-150

Dear Ms. Dortch:

In response to a request from the staff, BellSouth is providing a copy of the attached documents into the record of this proceeding. This information provides certain state specific usage information requested by the staff for use in comparing switching rates in various BellSouth states. Also included is a benchmarking analysis using this state-specific data, which updates the analysis included in my ex parte of August 5.

In accordance with Commission rules, I am filing copies of this notice and attachment and request that they be included in the record of the proceeding identified above.

Sincerely,



Glenn T. Reynolds

cc: Tamara Preiss  
Josh Swift  
Carol Canteen  
Dick Kwiatkowski  
Marvin Sacks  
Susan Pie  
James Davis-Smith (Department of Justice)

FCC Questions and Data Responses for 271 Reply  
07/31/2002

	A	B	C	D	E	F	G	H	I
	Query	Source	AL	GA	KY	LA	MS	NC	SC
1									
2									
3	<b>(1) What is the average length of inter-office transport for:</b>								
4	(a) local calls?	Assuming the Request Includes Dedicated, As Well As, Common Transport, Data is Not Available. Using BCATS-ID Data Vintage 1999 as Surrogate for Average Common Transport Miles.	31.25	25.77	32.95	23.98	33.21	24.08	23.63
5									
6	(b) intrastate intraLATA toll?	Assuming the Request Includes Dedicated, As Well As, Common Transport, Data is Not Available. Using BCATS-ID Data Vintage 1999 as Surrogate for Average Common Transport Miles.	31.25	25.77	32.95	23.98	33.21	24.08	23.63
7									
8	(c) intrastate interLATA toll?	BCATS-ID data Jan 2001-Dec 2001.	31.2	25.1	19.5	28.7	28.4	21.1	23.4
9									
10	(d) interstate interLATA toll?	BCATS-ID data Jan 2001-Dec 2001.	20.2	14.1	21.6	17.6	33.7	12.4	11.8
11									
12	<b>2) Provide the following:</b>								
13	(a) originating local MOU per line per month	Line 14*Line 15 (Represents Average Minutes per Message per Line per Month * Average Messages per Line per Month)	1042	790	789	1173	772	793	739
14		Subscriber Line Usage Study (SLUS) for Originating Local Usage. Reflects Average Minutes per Message per Line for a Composite of Residence Flat, Business Flat and PBX Flat Rate Classes. Data Vintage 1998. Georgia 1996. SLUS is No Longer Available.	4.30	3.20	3.90	4.60	4.00	4.10	3.50
15		Subscriber Line Usage Study (SLUS) for Originating Local Usage. Reflects Average Messages per Line per Month for a Composite of Residence Flat, Business Flat and PBX Flat Rate Classes. Data Vintage 1998. Georgia 1996. SLUS is No Longer Available.	242.40	246.90	202.30	255.10	192.90	193.50	211.00
16	(b) terminating local MOU per line per month	Data Not Available for Terminating. See Line 13, Response to 2a, above. Assume Terminating is Equal to Originating.	1042	790	789	1173	772	793	739
17									
18	<b>(c) originating:</b>								
19	(i) (intrastate) intraLATA toll MOU per line per month	Line 20/Line 41 (Represents 12 Months Toll Minutes/ 12 Months Access Lines)	5.83	2.68	5.69	1.81	8.34	1.17	5.07
20		Data Shown Reflects IntraLATA Toll (MTS) Minutes from MASTERS' Intrastate IntraLATA Toll Usage History Report Vintage 12 Months 02/2001. Data not specific for Originating vs. Terminating.	132,112,487	128,029,566	82,892,988	50,735,546	131,316,444	34,554,760	89,028,123
21									

FCC Questions and Data Responses for 271 Reply  
07/31/2002

	A	B	C	D	E	F	G	H	I
1	Query	Source	AL	GA	KY	LA	MS	NC	SC
2									
22	(ii) intrastate interLATA MOU per line per month	BCATS-ID data Jan 2001-Dec 2001.	43.05	42.12	42.03	43.41	34.65	49.38	40.69
23	(iii) interstate interLATA MOU per line per month	BCATS-ID data Jan 2001-Dec 2001.	134.92	179.45	145.34	132.34	150.24	158.54	155.77
24	(d) terminating:								
25	(i) (intrastate) intraLATA toll MOU per line per month	See Line 19, Response to 2c(i), above. Assume Terminating is Equal to Originating.							
26	(ii) intrastate interLATA MOU per line per month	BCATS-ID data Jan 2001-Dec 2001.	51.93	42.67	54.46	49.43	37.07	54.36	48.49
27	(iii) interstate interLATA MOU per line per month	BCATS-ID data Jan 2001-Dec 2001.	109.55	127.14	105.33	106.42	127.6	103.81	114.08
28	(e) % of local MOU that is intra-switch (intraoffice)	Network Information Warehouse (NIW) System 1998 Vintage Data (Weighted % Intraoffice)	34.58%	27.57%	42.69%	35.00%	45.08%	27.14%	33.44%
29	(f) % of local MOU that is inter-switch (interoffice)	Difference of 1 - Intraoffice %	65.42%	72.43%	57.31%	65.00%	54.92%	72.86%	66.56%
30	(g) % of inter-switch local MOU that is tandem-routed	Shown is % Local Tandem Occurrence of Interoffice Calls for Local Usage. Data Derived from STRAPS Report for Local/Toll MOU and Tandem Local/Toll MOU. Data Vintage 2000.	9.43%	6.46%	4.05%	8.64%	13.25%	12.97%	6.24%
31	(h) :								
32	(i) % of intraLATA toll MOU that is tandem-routed	Shown is % Local Tandem Occurrence of Interoffice Calls for Toll Usage. Data Derived from STRAPS Report for Local/Toll MOU and Tandem Local/Toll MOU. Data Vintage 2000.	44.51%	45.22%	43.21%	23.26%	43.13%	41.64%	47.10%
33	(ii) % of intrastate interLATA MOU that is tandem-routed	BCATS-ID data Jan 2001-Dec 2001.	43.00%	32.00%	38.00%	42.00%	41.00%	32.00%	37.00%
34	(ii) % of interstate interLATA MOU that is tandem-routed	BCATS-ID data Jan 2001-Dec 2001.	30.00%	18.00%	28.00%	33.00%	31.00%	20.00%	20.00%
35	(i) average common transport distance for inter-switch (interoffice) local calls; and	Specific Data is Not Available as Requested. Using BCATS-ID Data Vintage 1999 as Surrogate for Average Common Transport Miles.	31.25	25.77	32.95	23.98	33.21	24.08	23.63
36	(j) average common transport distances for:								
37	(i) intraLATA toll calls	Specific Data is Not Available as Requested. Using BCATS-ID Data Vintage 1999 as Surrogate for Average Common Transport Miles.	31.25	25.77	32.95	23.98	33.21	24.08	23.63
38	(ii) intrastate interLATA calls	BCATS-ID data Jan 2001-Dec 2001.	33.3	28.6	31.4	25	33.1	24	23.3
39	(iii) interstate interLATA calls	BCATS-ID data Jan 2001-Dec 2001.	32.1	22.3	30.3	23.1	32.1	22	22.1
40									
41	Access Lines 01-12/2001	is_mou_per_line.xls, TAB Access Lines	22,655,457	47,791,399	14,558,482	28,016,959	15,747,094	29,520,051	17,570,070
42									
43	Non-Local (Originating)	Non-Local Calls per Line per Month (Orig)	183.80	224.25	193.06	177.56	193.23	209.09	201.53
44									

**BENCHMARKING ANALYSIS**  
 (Based on State-specific Switching Usage data)

BellSouth Telecommunications, Inc.

<b>HCPM</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
Loop	\$22.86	\$22.35	\$18.98	\$29.89	\$15.54	\$19.25	\$15.20
Port	\$1.01	\$0.98	\$0.96	\$1.07	\$0.96	\$0.90	\$0.92
End Office	\$2.37	\$2.30	\$2.24	\$2.53	\$2.25	\$2.11	\$2.16
Signaling	\$0.17	\$0.23	\$0.18	\$0.20	\$0.18	\$0.20	\$0.11
Transport	\$0.94	\$1.23	\$0.94	\$1.66	\$0.44	\$0.88	\$0.43
EO+Signal+Trans	\$3.48	\$3.76	\$3.36	\$4.39	\$2.87	\$2.99	\$2.70
All Switch-Related (port + Usage)	\$4.49	\$4.74	\$4.32	\$5.46	\$3.83	\$3.89	\$3.62
Total - HCPM	\$27.35	\$27.09	\$23.30	\$35.35	\$19.37	\$23.14	\$18.82
<b>UNE</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
Loop (P.1.1)	\$16.66	\$17.26	\$16.24	\$22.37	\$14.18	\$16.51	\$12.55
Port (P.1.1)	\$1.15	\$1.15	\$1.36	\$1.23	\$2.28	\$1.13	\$1.79
<b>Reflects State-Specific Usage Characteristics. Includes non-local calls.</b>							
End Office	\$1.79	\$2.24	\$4.66	\$1.87	\$3.17	\$2.05	\$3.26
Signaling	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Transport	\$0.34	\$0.55	\$0.42	\$0.33	\$0.46	\$0.36	\$0.49
EO+Signal+Trans	\$2.13	\$2.78	\$5.09	\$2.20	\$3.62	\$2.40	\$3.76
Features	\$1.98	\$0.00	\$0.00	\$2.56	\$0.00	\$3.04	\$0.00
All Switch-Related (Port + Usage + Features)	\$5.26	\$3.93	\$6.45	\$5.99	\$5.90	\$6.57	\$5.55
All Switch-Related (Port + Usage + 55% *Featur	\$4.37	\$3.93	\$6.45	\$4.84	\$5.90	\$5.21	\$5.55
Total	\$21.92	\$21.19	\$22.69	\$28.36	\$20.08	\$23.08	\$18.10
Total (55% Features)	\$21.03	\$21.19	\$22.69	\$27.21	\$20.08	\$21.72	\$18.10

**BENCHMARKING ANALYSIS**  
(Based on State-specific Switching Usage data)

BellSouth Telecommunications, Inc.

<b>Total Switch-related Costs</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
State Rates	\$5.26	\$3.93	\$6.45	\$5.99	\$5.90	\$6.57	\$5.55
USF Model Rates	\$4.49	\$4.74	\$4.32	\$5.46	\$3.83	\$3.89	\$3.62
<b>Comparison - to LA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	82%	61%		93%	92%	102%	86%
USF	104%	110%		126%	89%	90%	84%
<b>Comparison - to GA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	95%	71%	116%	108%	106%	119%	
USF	124%	131%	119%	151%	106%	107%	
<b>Total Switch-related Costs (55% Features)</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
State Rates	\$4.37	\$3.93	\$6.45	\$4.84	\$5.90	\$5.21	\$5.55
USF Model Rates	\$4.49	\$4.74	\$4.32	\$5.46	\$3.83	\$3.89	\$3.62
<b>Comparison - to LA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	68%	61%		75%	92%	81%	86%
USF	104%	110%		126%	89%	90%	84%
<b>Comparison - to GA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	79%	71%	116%	87%	106%	94%	
USF	124%	131%	119%	151%	106%	107%	
<b>Loop Costs</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
State Rates	\$16.66	\$17.26	\$16.24	\$22.37	\$14.18	\$16.51	\$12.55
USF Model Rates	\$22.86	\$22.35	\$18.98	\$29.89	\$15.54	\$19.25	\$15.20
<b>Comparison - to LA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	103%	106%		138%	87%	102%	77%
USF	120%	118%		157%	82%	101%	80%
<b>Comparison - to GA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	133%	138%	129%	178%	113%	132%	
USF	150%	147%	125%	197%	102%	127%	
<b>Switching + Loop Costs</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
State Rates	\$21.92	\$21.19	\$22.69	\$28.36	\$20.08	\$23.08	\$18.10
USF Model Rates	\$27.35	\$27.09	\$23.30	\$35.35	\$19.37	\$23.14	\$18.82
<b>Comparison - to LA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	97%	93%		125%	89%	102%	80%
USF	117%	116%		152%	83%	99%	81%
<b>Comparison - to GA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	121%	117%	125%	157%	111%	128%	
USF	145%	144%	124%	188%	103%	123%	
<b>Switching (55% Features)+ Loop Costs</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
State Rates	\$21.03	\$21.19	\$22.69	\$27.21	\$20.08	\$21.72	\$18.10
USF Model Rates	\$27.35	\$27.09	\$23.30	\$35.35	\$19.37	\$23.14	\$18.82
<b>Comparison - to LA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	93%	93%		120%	89%	96%	80%
USF	117%	116%		152%	83%	99%	81%
<b>Comparison - to GA</b>	<b>AL</b>	<b>KY</b>	<b>LA</b>	<b>MS</b>	<b>NC</b>	<b>SC</b>	<b>GA</b>
UNE	116%	117%	125%	150%	111%	120%	
USF	145%	144%	124%	188%	103%	123%	