

Cost Quest Support / Mark,

I've got a few follow-up questions, focusing on the company specific data for Virgin Islands Telephone Corporation ("VITELCO") included in the CAM v4.0.

1. On November 12, 2013, Parrish, Blessing & Associates, Inc., on behalf of the Virgin Islands Telephone Corporation (Vitelco), provided to CostQuest materials that included undersea cable route miles associated with middle mile transmission routes within the U.S. Virgin Islands. These materials included undersea route miles, as provided by Vitelco engineers, for the following segments:

a. 76 miles between the Peterborg cable station on the north shore of St. Thomas to the Frederiksted cable station on the west coast of St. Croix; and

b. 3 miles between the Red Hook facility on the east coast of St. Thomas and the Cruz Bay facility on the west coast of St. John.

These mileages translate to a total undersea route distance of 417,120 feet.

In contrast, the table on Page 3 of the Wireline Competition Bureau's Public Notice DA 13-2305, released December 2, 2013, identified a Submarine Middle Mile distance of 269,639 feet for the U.S. Virgin Islands, a distance approximately 35% shorter than the total undersea cable route distance provided by Vitelco.

Please describe the source of the submarine cable middle mile route distance identified in the WCB's December 2nd Public Notice and explain the rationale for using the shorter middle mile submarine cable route distance rather than the middle mile undersea route distance provided by Vitelco.

RESPONSE

The links among Node0s in CACM 4.0 are developed using the spanning tree approach described in Methodology Appendix 2. In summary, the goal of the spanning tree is to connect Node0s using minimal total distance. There is no change to how the nodes are connected in CACM 4 versus 3.x. What has changed is how the paths are identified as to partially submarine and how the distances for those paths (road distance or not) are resolved.

We don't speak for the Commission, but my understanding of the intent of CACM model is to model a forward looking network not necessarily to be reflective of any carrier's existing network facilities.

2. As indicated in Footnote 12 to the WCB's Public Notice of December 2nd, the U.S. Virgin Islands is not included in the Natural Resources Conservation Service STATSGO Digital General Soil Map of the United States. In the absence of the STATSGO source data, please describe the methodology used in CAM v4.0 to determine whether a census block group in the U.S Virgin Islands is considered to consist of hard rock.

Also, the link below indicates that the STATSGO2 database is available and that it includes the U.S. Virgin Islands.

http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/geo/?cid=nrcs142p2_053629

Field Co

Will the STATSGO2 database be used to determine whether a census block in the U.S. Virgin Islands is considered hard rock in an updated version of the CAM?

RESPONSE

In the absence of rock hardness information in STATSGO, no determination as to Hard Rock terrain can be made. As described in the Methodology, other factors such as depth to bedrock are used in terrain cost determination. Given the lack of data for VI, CAM 4 uses a soft rock or medium terrain attribute for VI.