

ICC Docket No. 02-0864  
SBC Illinois Exhibit 17.1 (Dominak)  
Schedule TD-S1

**Illinois Commerce Commission  
Docket 02-0864  
AT&T Data Request BFP 527**

**Request:**

Provide SBC's full general ledger data for the past five years, by account and TCC code.

**Response:**

SBC Illinois objects to this request on the grounds that it is vague, overly broad, unduly burdensome, and not reasonably designed to lead to the discovery of admissible evidence. Approximately 28 million rows of data would need to be provided in order to supply all the information requested. Notwithstanding and without waiving the foregoing objections, the attached spreadsheet [BFP 527 Attachment FRC 1998 to 2002.xls] contains general ledger activity for 1998 to 2002 for the Field Reporting Codes (FRCs), Main Accounts and TCCs included in the Loop and DLC installation factors. The information in this spreadsheet is confidential and is subject to the terms of the Proprietary Agreement in this case.

**Illinois Commerce Commission  
Docket 02-0864  
AT&T Data Request BFP 529**

**Request:** Provide the raw data for DLC equipment that flows into the general ledger at the equipment level, project level, or the lowest level of detail available.

**Response:** The attached Access Database file "257C19982002" consists of 5 tables that contain the raw data for DLC equipment at the lowest level of detail available for 1998 to 2002. Each table contains the following elements associated with each dollar amount (from left to right): Plant Status Account (2001 for all records); GLA (General Ledger Account – 4 character main account and 4 character sub account, 22321210 for all records); FRC (Field Reporting Code – 257C for all records); TCC (Transaction Category Code); and Project (Undertaking Number used to accumulate costs for asset related activities). The information in the tables is Confidential and is being provided subject to the terms of the Proprietary Agreement in this case.

**Witness Responsible:** Tim Dominak

**Illinois Commerce Commission**  
**Docket 02-0864**  
**AT&T Data Request BFP 530**

**Request:**

Provide full access to SBC's general ledger data, including all information that flows into the general ledger and all processes used to develop the installation factors based on the general ledger data.

**Response:**

SBC Illinois objects to the request for "full access to SBC's general ledger data, including all information that flows into the general ledger" on the grounds that such request is overly broad, unduly burdensome and is not reasonably designed to lead to the discovery of admissible evidence. The request for "full access" to SBC Illinois' underlying general ledger data, which represents a massive volume of data (approximately 120 gigabytes), is not necessary for a review of SBC Illinois' forward looking cost studies in this case. .

Notwithstanding and without waiving the foregoing objections, SBC Illinois refers AT&T to the response to Data Request BFP-.527, which contains 5 years of general ledger data covering the FRCs (Field Reporting Codes) that were used to develop the installation factors used in the loop recurring cost study supported by SBC Illinois rebuttal filing. .

The following describes the process used to develop installation factors based on the general ledger data

Cable and Wire Accounts

1. The general ledger data is grouped by transaction cost codes (TCCs) into categories (e.g., Material, TELCO Labor, etc.) and subtotaled in the workbook 'Illinois Loop data request\_RevJAN04.xls'. (This workbook was supplied as a supporting workpaper on 02 FEB 04.)
2. There are tabs in this workbook for each cable type (e.g., IL 5C (Underground Copper), IL 845C (Buried Fiber), etc.).
3. This workbook also contains the adjustments with which NID/Drop account information is removed from the aerial and buried cable account data.
  - a. Tabs 'IL 22C with 52C' and 'IL 45C with 545C' contain the cable account data before adjustment.
  - b. Tabs 'IL 52C' and 'IL 545C' contain the specific NID/Drop account information that is removed from the cable account data.

- c. Tabs 'IL 22C wo 52C' and 'IL 45C wo 545C' contain the cable account data after adjustment that is now used to calculate the cable account loop installation factors.
4. The categorized subtotals are posted to the workbook 'LoopFactorIL02BasedOn01Data(LoopCAT)\_RevJAN04.xls' in each respective cable type tab (e.g., tab 'IL 45C'). This workbook was supplied as a supporting workpaper on the cost support CD that was made available on 22 JAN 04.
  - a. This file calculates the installation factors by dividing each of the average installation costs by the average material cost (e.g., Avg. TELCO Labor / Avg. Material = TELCO Labor Installation Factor).
  - b. The resultant factors flow to the 'Loop Installation Factors' tab, which are then transferred to the LoopCAT model, on the 'Yearly\_Inputs tab'.

### 257C

1. The general ledger data for 257C is posted in the workbook 'IL 2002 Loop Installation Factors.xls', on tabs 257C-HW and 257C-PI. In order to differentiate Hardwired and Plug-in equipment under 257C, two sets of data were identified. Plug-in investment was defined by compiling the underlying transactions associated with plug-in investment. Hardwired investment was defined as all remaining transactions after removing the plug-in transactions (This file was supplied as a supporting work paper on the cost support CD that was made available on January 22, 2004).
2. The data is grouped by TCCs into categories (e.g., Material, TELCO Labor, etc.) and a subtotal is calculated for each category.
3. The data is then transferred to tab "Loop Installation", where an average over three years is calculated for each TCC.
  - a. Each installation cost category subtotal is then divided by the average subtotal of material to generate the individual components of the installation factors (e.g., Avg. TELCO Labor / Avg. Material = TELCO Labor Installation Factor).
  - b. The resultant factors flow to the 'Loop Design&Install Factors' tab. If any of the installation factor component results in a negative number, which is due to one time credits or other reasons, this is considered not forward-looking, and set to zero. The final results are then transferred to the LoopCAT model, on the 'Yearly\_Inputs tab'.

**Witness Responsible:** James R. Smallwood  
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