

5. Transport Facilities Termination and Transport Facilities per MOU

AT&T's Recip Comp and TTS studies include Transport Facilities Termination (per MOU) and Transport Facilities (per MOU) cost elements. These elements reflect the cost of the facilities from AT&T to the terminating carrier.¹⁵³

The wireless carriers must establish a POI at the AT&T tandem for mobile-to-land traffic; thus, wireless carriers must pay for the transport to the tandem for this traffic.¹⁵⁴ For land-to-mobile traffic, AT&T must pay to transport traffic up to 14 miles from its tandem to the "handoff" point with the wireless carrier.¹⁵⁵

The Department will not eliminate the Transport Facilities Termination or Transport Facilities components from AT&T's cost studies. The 14-mile transport (for land-to-mobile traffic) is AT&T's financial responsibility in its relationship with Connecticut wireless carriers and in the other 21 states.¹⁵⁶ Hence, the network modeled by the Telco in its cost studies reflects the prevailing interconnection arrangements AT&T has with wireless carriers. Accordingly, AT&T must modify its cost studies to reflect the 14-mile transport for wireless carriers.

6. Transit Traffic Factor (TTF)

AT&T indicates that its Connecticut wireless billing system is unable to bill wireless carriers two different rates for Recip Comp and TTS. Therefore, to the extent the rates are different, AT&T developed a TTF for each wireless carrier.¹⁵⁷ The TTF represents the percentage of total wireless carrier-originated traffic (other than access traffic) sent to AT&T by a wireless carrier that is transit traffic. AT&T then manually adjusts the wireless carrier's bill to assess the TTS rate to the transit MOUs that are calculated via application of the TTF. Connecticut is the only state in AT&T's territory where it imposes the TTF. AT&T notes that the TTF is not a cost and is not supported by a cost study; rather, it is a ratio of transit traffic to total originated local traffic developed for each individual wireless carrier based on that carrier's traffic patterns.¹⁵⁸ At the hearing, AT&T indicated that it had negotiated a TTF with Pocket and that the issue was moot.¹⁵⁹

The Department concludes that the issue of the TTF between AT&T and Pocket is now settled. As indicated in the October 7, 2009 Decision in Docket No. 08-12-04,

¹⁵³ AT&T Response to Interrogatory TE-47.

¹⁵⁴ Tr. 10/29/09, p. 903.

¹⁵⁵ Pocket acknowledges that if it is paying for the 14-mile transport for land-to-mobile traffic, it is doing so by choice given AT&T's contractual obligations. Pocket also acknowledges that it could require AT&T to pay these costs consistent with their contractual terms at any time. Furthermore, the record indicates that AT&T pays for the 14-mile transport per its agreement with Sprint. Tr. 10/29/09, pp. 899 and 900; AT&T Brief, p. 36; LFE No. 25.

¹⁵⁶ The Telco agrees that the mileage assumption in its cost studies should be 14 miles as it is financially responsible under the wireless interconnection agreements. AT&T Reply Brief, p. 20.

¹⁵⁷ Tr. 09/21/09, pp. 32 and 33.

¹⁵⁸ Id.

¹⁵⁹ Id.

the TTF agreed to by the parties will be subject to a true-up at the conclusion of this proceeding. The Department directs AT&T and Pocket to work cooperatively to calculate the true-up for the TTF. Moreover, other carriers should follow the change of law provisions outlined in their existing interconnection agreements with AT&T Connecticut.

7. Trunk Utilization/Fill Factor

The Telco indicates that "trunk fill" is the number of trunks (or trunk ports) installed in a switch as a ratio of total installed trunks.¹⁶⁰ The trunk fill value proposed by AT&T (in its SICAT study¹⁶¹) represents the midpoint of the range AT&T network engineers use to determine whether its network is "healthy."¹⁶² AT&T also includes a CCS assumption, a separate trunk fill/utilization factor, in its cost studies that determines the volume of traffic carried on a trunk during the busy hours of business days. The CCS assumption serves to reduce utilization/fill on a trunk from its full 36 CCS to a lower level.¹⁶³ AT&T acknowledged that there is an interaction between the trunk fill/utilization and the CCS assumption that serves to lower the overall fill/utilization of its trunk facilities in the studies.¹⁶⁴ This interaction results in an effective trunk fill/utilization significantly below the "midpoint" value proposed by AT&T.

Pocket recommends running the SICAT model in "marginal" mode instead of "average" mode in order to increase the assumed fill.¹⁶⁵ TSLRIC is not a marginal cost methodology; rather, it is an average cost methodology. Accordingly, the Department will not adopt Pocket's recommendation to run SICAT using the "marginal" macro. However, it is important to recognize that there are two places in the studies that control trunk utilization (the trunk utilization/fill factor in SICAT and the CCS assumption in the Recip Comp and TTS studies) and that the cumulative impact of these factors is an unreasonably low effective fill/utilization.

The Department concludes that AT&T should re-run its cost studies with an effective overall trunk fill/utilization no higher than the "midpoint" value proposed by AT&T. This overall effective utilization/fill should take full account of the cumulative interaction between the CCS assumptions in the Recip Comp and TTS studies and the utilization/fill in the SICAT model. The cumulative interaction between the two should result in an effective fill/utilization that is not higher than AT&T's proposed number.¹⁶⁶

¹⁶⁰ Hamiter PFT, p. 19. The terms "fill" and "utilization" are equivalent and are used interchangeably. Tr. 09/21/09, p. 244.

¹⁶¹ SICAT Tab Output.

¹⁶² Hamiter PFT, pp. 19 and 20.

¹⁶³ CCS is a measure of 100 seconds. Given that there are 3600 seconds in an hour, there are 36 CCS in an hour. Tr. 09/21/09, pp. 256 and 257.

¹⁶⁴ AT&T acknowledges that because of this interaction, the effective fill/utilization factor can be lower. *Id.*, p. 255.

¹⁶⁵ Benedict PFT, p. 23.

¹⁶⁶ This can be accomplished by changing the fill factor in the SICAT model to 95% while leaving AT&T's CCS values as they are.

8. Channel Mileage Distance Assumption

AT&T's Recip Comp and TTS studies include a channel mileage cost component. This input represents the transport facility distance (in miles) between AT&T's tandem and end offices (in the Recip Comp study) as well as the distance between the AT&T tandem and the CLEC/wireless carriers' POIs (in the TTS studies).¹⁶⁷ AT&T did not perform a study for this input because there was not sufficient time; therefore, the Telco used an assumed distance as a proxy.¹⁶⁸

The Department finds that AT&T's assumed channel mileage distance is unsupported and excessive. Pocket has demonstrated to the Department's satisfaction that the proper mileage is 11.43 miles as it was based on Pocket's correction for tandem offices not interconnected to the closest end office.¹⁶⁹ Accordingly, the Department adopts 11.43 miles for channel mileage for the Recip Comp, 11.43 miles for TTS (CLEC) and 14 miles for TTS (Wireless) studies, respectively.

9. Cost of Money

Pocket takes issue with AT&T's proposed debt-to-equity ratio.¹⁷⁰ Pocket states that this input is out of line with the debt-to-equity ratio approved by the Department for other utilities and the booked values for the Telco and other telephone companies. Pocket recommends using AT&T's booked value of 43.7/56.3 debt/equity, respectively.¹⁷¹ Pocket also takes issue with AT&T's proposed weighted average cost of capital (WACC) and recommends a WACC of 7.3% based on a study from the University of Connecticut's Student Managed Fund.¹⁷²

The Telco's cost of capital is based on an analysis of the market cost of capital for AT&T, Inc., the Telco's parent company.¹⁷³ The Telco contends that TSLRIC requires the use of market values for cost of capital and capital structures, and Pocket's analysis and recommendations are flawed because they are based on book values.¹⁷⁴

A market value capital structure is appropriate for use in a forward-looking cost study because it reflects assumptions that are consistent with a competitive market. Additionally, a market value capital structure has been widely accepted by regulatory commissions in proceedings where forward-looking cost studies are used. Pocket did not demonstrate that its proposed booked capital structure was better reflective of the

¹⁶⁷ *Id.*, pp. 98-101.

¹⁶⁸ Tr. 09/21/09, pp. 100-102.

¹⁶⁹ AT&T agrees that the mileage should be 11.87. AT&T Brief, p. 38. The Department finds the impact of using 11.43 miles vs. 11.87 miles is de minimis.

¹⁷⁰ Pocket Brief, p. 38.

¹⁷¹ *Id.*

¹⁷² *Id.*, p. 39.

¹⁷³ The cost of capital is based on that of AT&T, Inc. because the Telco has no publicly traded common stock, and in turn, there is no market basis to estimate investors' required rate of return. Mollet PFT, p. 17.

¹⁷⁴ AT&T Reply Brief, pp. 28 and 29.

risks faced by the Telco than AT&T's proposed market value capital structure. Similarly, Pocket did not demonstrate its proposed WACC was more appropriate than the Telco's. Accordingly, the Department will accept AT&T's debt-to-equity ratio and WACC used in its cost studies.

10. Nodes

The cost studies consider the average number of nodes in the Telco's network. These nodes represent the number of "stops" or "dropoff point(s)" that the synchronous optical network (SONET) ring makes along its route,¹⁷⁵ or the points at which a circuit passes through a switching office.¹⁷⁶ Because each node has a cost associated with it, the greater the number of nodes assumed, the greater the costs.

AT&T asserts that the nodes are designed by facility planners when developing facility routes based on factors such as population, network diversity and terrain.¹⁷⁷ The average node count in Connecticut is about 1.6 times the national average.¹⁷⁸ Pocket asserts that this data is indicative of AT&T's over-built network and that its competitors should not be responsible for the associated costs of the excess nodes in the Telco's Recip Comp and TTS rates. Therefore, Pocket recommends reducing the nodes in AT&T's cost study to the national average.¹⁷⁹

The Department finds AT&T has shown that the assumed node counts accurately reflect those in the Telco's network. The record also shows that besides Connecticut, Texas, Missouri and Kansas also have a higher or comparable number of nodes per ring.¹⁸⁰ The fact that the Connecticut node count exceeds that in other states is not sufficient grounds for modifying the Connecticut-specific input. The Department will not require that the average number of nodes assumed in the Telco's cost studies be modified at this time.

11. DS1 Expense

The DS1 Expense is a cost component that is only included in the TTS and not in the Recip Comp study. Typically, each CLEC is responsible for bringing its originated transit traffic to a POI for hand off. For all CLECs in Connecticut (except Cablevision, Comcast and Cox) the POI is established at AT&T's tandem switch. Therefore, in most transiting situations, the originating CLEC brings its transit traffic to the AT&T tandem switch where it is switched, and handed off to a third party terminating carrier who also has a POI at the tandem switch. Under these circumstances, AT&T is only switching and not transporting the call (mileage is assumed to be 0 within the same tandem office).

The Cable CLECs have provisions in their interconnection agreements with AT&T that require the Telco to transport traffic to their switches (effectively establishing

¹⁷⁵ Tr. 09/21/09, p. 329; Pocket Brief, p. 30.

¹⁷⁶ AT&T Reply Brief, p. 18.

¹⁷⁷ Tr. 10/29/09, p. 831.

¹⁷⁸ LFE No. 16, Attachment A shows a comparable average number of nodes per circuit in the Telco's network.

¹⁷⁹ Pocket Brief, p. 41.

¹⁸⁰ LFE No. 16.

the POI at each Cable CLEC switch location instead of at the AT&T tandem switch). In these instances, the Cable CLECs charge AT&T for transporting traffic to their respective switches. AT&T contends that in the case of a transit call, it is the originating carrier that should be responsible for the cost of this transport and not the Telco. Consequently, AT&T developed the DS1 Expense for inclusion in the TTS to reflect the Telco's cost when routing transit calls to these three Cable CLECs.

Inclusion of the DS1 Expense in the TTS studies is appropriate. No party disputed AT&T's claims that the Cable CLECs have POIs at the CLEC switch location instead of AT&T's tandem switch or that the Telco incurs a cost related to DS1 transport to route transit traffic originated by CLECs and wireless carriers to those three Cable CLECs' POIs. The Department notes that the DS1 expense is a relatively minimal portion of the transit cost, amounting to 0.46% of the TTS (Wireless) per MOU cost¹⁸¹ and 3.7% of the Transit (CLEC) per MOU cost.¹⁸² The Department also disagrees with Pocket that the DS1 expense should be borne by the three Cable CLECs. It is generally accepted that the "cost causer" in the case of a transit call is the originating carrier, and the Department will not disturb this well-settled principle.

12. Overhead – Buildings, Land and Power

AT&T contends that TSLRIC requires the use of the full value of buildings because it involves reconstructing the local network including purchasing of buildings.¹⁸³ The Telco asserts that Pocket's recommendation to use the depreciated value of buildings would lead to AT&T under-recovering its depreciation expense and would establish costs based on book costs rather than the current value of the buildings.¹⁸⁴ AT&T also disagrees with Pocket's claim that buildings are non-recurring costs as it would violate the cost causation principle.¹⁸⁵ Additionally, AT&T notes that Pocket has provided no reference cite to an order or Department Decision supporting its proposal to use the depreciated value of buildings.¹⁸⁶

The Department does not adopt Pocket's proposed adjustments to these inputs and disagrees that AT&T's land and building costs should be disallowed or reduced. Such a modification would violate the TSLRIC principle, which assumes that AT&T's network is re-built from scratch. The Department also declines to use the depreciated value of AT&T's buildings as recommended by Pocket. Pocket's recommendation reflects the book cost, instead of current cost, of AT&T's buildings, which is inconsistent with TSLRIC. Additionally, Pocket has not demonstrated that AT&T's cost studies systematically assign a disproportionate amount of square footage to network functions or that a 50% reduction in square footage is warranted.

¹⁸¹ Transit (Wireless) cost study filed July 17, 2009 (Transit_CT_Wireless_7-17-09.xls). Divide value at Tab Transit BOC cell I27 by the value at Tab Cost Study Results cell C10.

¹⁸² Transit (CLEC) cost study filed July 17, 2009 (Transit_CT_CLEC_7-17-09.xls). Divide value at Tab Transit BOC cell I27 by the value at Tab Cost Study Results cell C10.

¹⁸³ AT&T Reply Brief, pp. 11 and 12. AT&T notes that the cost of the building is recovered in TSLRIC rates through an annual depreciation expense over the entire economic life. Id.

¹⁸⁴ Id., pp. 12 and 13.

¹⁸⁵ Id., p. 14.

¹⁸⁶ Id., p. 11.

Regarding the power issue, the Department agrees with AT&T that this cost component is for back-up power to operate the equipment in the building in which the equipment is located and as such, the Department finds this to be a reasonable cost.

13. DS1 Electronics Investment Input

Pocket takes issue with AT&T's proposed input for DS1 electronics investment because it is greater than that for a complete tariffed DS1.¹⁸⁷ Pocket recommends that the total DS1 cost input be significantly reduced.¹⁸⁸

AT&T contends that the electronics cost comes directly from the Telco's contracts with equipment vendors and reflects the actual cost that it would incur for the electronics.¹⁸⁹ AT&T states that Pocket's comparison to the Telco's private line tariff is confusing because that tariff section referenced by Pocket is silent relative to DS1 private lines.¹⁹⁰ Finally, AT&T notes that Pocket's proposed adjustment to the DS1 electronics applies only to land, building and backup power; hence, Pocket is not challenging the cost of electronics themselves.¹⁹¹

The Department finds that comparing an investment amount (which must be converted to annual or monthly costs) to a tariffed monthly rate is not an "apples to apples" comparison. Pocket did not address the documentation AT&T provided in support of its electronics investment. The source of the DS1 electronics investment input Pocket discusses¹⁹² is AT&T's response to Interrogatory TE-6, File: First Cost Development Workpaper – East.xls Tab Total Inv¹⁹³ (the interoffice transport work papers). Upon review, the Department does not conclude that this investment input is excessive or that it should be reduced based on Pocket's comparison alone and absent additional details and analysis about the constituent cost components. This is particularly true in light of AT&T's explanation that this investment amount comes directly from equipment vendor contracts.

14. Trunk-to-Line Ratio

Pocket recommends that the Department increase the Lucent switch trunk-to-line ratio to conform with the Nortel switch ratio.¹⁹⁴ AT&T asserts that its proposed trunk-to-line ratio, filed under protective order, is set by the switch vendors based on their particular products and capabilities such as processor speed and capacity.¹⁹⁵ AT&T

¹⁸⁷ "Electronics" is defined as all the electronic equipment used to transport a DS0 through AT&T Connecticut interoffice network. The network elements are SONET equipment, D4 Channel Banks, DS0/DS1 Digital Cross Connect (DCS) equipment, Termination Jacks and M13 Multiplexers. AT&T Response to Interrogatory Pocket-AT&T-56.

¹⁸⁸ Benedict PFT, p. 18.

¹⁸⁹ AT&T Brief, p. 32.

¹⁹⁰ *Id.*, p. 33.

¹⁹¹ *Id.*

¹⁹² Benedict PFT, p. 18.

¹⁹³ Response to Interrogatory TE-6, File: CT DS1 UNE IO Inv 6-11-09_PROP.xls Tab Network Invst.

¹⁹⁴ Pocket also references "industry standards," but does not cite the specific trunk-to-line standards to which it refers. Pocket Brief, p. 36.

¹⁹⁵ Tr. 09/22/09, pp. 381 and 382.

also contends that Pocket misunderstands the cost study and provided an invalid comparison.¹⁹⁶

Upon review of the SICAT model, Tabs LU BOC and NT BOC, the Department finds that AT&T applied the line-to-trunk ratio inconsistently. Specifically, with respect to EO Replacement Switch trunks, the line-to-trunk ratio was applied twice: in Tab LU BOC, it is applied once in cell E48, and then again in cell E53. By contrast, with respect to the EO Growth trunks, cell E49 does not (as cell E48 does) apply the line-to-trunk ratio. Rather, cell E49 is calculated as $1 - E48$, which amounts to the following: $E49 = 1 - (\% \text{ Replacement Lines} / \text{Line-to-trunk ratio})$. Conceptually, this calculation makes no sense and is erroneous. The same problems are found in Tab NT BOC. Therefore, in the cost study compliance runs required by this decision, AT&T should correct cells E48 and E49 on Tabs LU BOC and the corresponding cells in Tab NT BOC to properly reflect the replacement and growth mix approved by the Department.

Furthermore, the record shows that AT&T has experienced a decline in access lines and the Telco's network in Connecticut appears overbuilt relative to current traffic volumes.¹⁹⁷ Specifically, AT&T has experienced a decline in access lines of approximately 33% over the period of 2000 to 2007. With such a decline in access lines, there are no grounds to believe that AT&T's current line-to-trunk ratios are cost efficient and consistent with TSLRIC requirements. Similarly, the record shows that AT&T has a significant excess of trunk ports in Connecticut,¹⁹⁸ which demonstrates that too many trunk ports are serving too few lines. Too many trunk ports serving too few lines means that the line-to-trunk ratios are too low for an efficient configuration, required by TELRIC principles. In light of these considerations, the Department finds that an adjustment is warranted for these inputs and requires AT&T to increase the line-to-trunk ratios for Lucent and Nortel by an increment of one additional line per trunk for each vendor. These line-to-trunk ratios are to be entered in SICAT in the Tab Input-Cost Drivers. In the opinion of the Department, this adjustment to the line-to-trunk ratios is less than the adjustment AT&T itself proposes for trunk fill factors in view of the excess number of trunk facilities. As such, this adjustment is conservative.¹⁹⁹

15. Alleged Inconsistent Inputs

Pocket points to a number of alleged inconsistencies in the inputs used in the Telco's cost studies and contends that these inconsistencies question the veracity of AT&T's studies as a whole. Pocket asserts that the Transport Facilities Termination cost elements are inconsistent between the Recip Comp and Wireless Transit cost

¹⁹⁶ AT&T Reply Brief, p. 26.

¹⁹⁷ See, e.g., AT&T Response to Interrogatory TE-43 and LFE-2.

¹⁹⁸ The actual trunk port fill for the average Connecticut end office was about 40%. Mollet PFT, p. 6.

¹⁹⁹ The "line-to-trunk ratios" in the SICAT are cost study calculations and they do not correspond to the technical line-to-trunk ratios used by engineers. For example, as shown in the SICAT and the Recip Comp study, usage costs stem from both trunks (Trunk Costs) and lines (CCS Costs). That is, the cost study includes usage costs associated with "lines" (also see SICAT, Tab CCS Investments.) As such, the calculations referred to as "line-to-trunk" ratios in the SICAT are more reflective of a line-to-(trunk plus lines) ratio than of an engineering line-to-trunk ratio. This further weakens AT&T's claims that the line-to-trunk ratios are switch vendor determined.

studies, even though there appears to be no difference in the inputs.²⁰⁰ The Department acknowledges that the Transport Facilities Termination per MOU in the Recip Comp study exceeds the same component in the Wireless Transit study by 12%;²⁰¹ however, the Department disagrees with Pocket that there are no differences in these inputs. The Bill of Cost Tabs show that the Average Duration of Call, Quantity, and cost activities all which are used in calculating the Transport Facilities Termination, differ between the Recip Comp and Wireless Transit cost studies.²⁰²

Pocket also notes the differences in the Tandem Switching values between the Recip Comp and Wireless TTS cost studies and asserts that there is no difference in the inputs.²⁰³ The Department acknowledges that the Tandem Switching per MOU for the Wireless Transit study exceeds the same component in the Recip Comp study by 28%;²⁰⁴ however, some inputs used to calculate Tandem Switching differ between the two studies.

Additionally, Pocket cites to differences in the Call Duration inputs between the Recip Comp study, the Wireless TTS and the SICAT study output. According to Pocket, there are no explanations for these variations.²⁰⁵ However, AT&T provided supporting documentation for its average call durations used in the Recip Comp and Wireless TTS cost studies.²⁰⁶ Pocket did not refute AT&T's documentation. The Department does not believe it is appropriate to use a combined average call duration in the cost studies when there are more precise averages for each type of traffic. Accordingly, the Department declines to adopt Pocket's recommendation to modify AT&T's proposed average call durations.

Further, Pocket observes that the number of end user switched access lines reported for AT&T as of June 30, 2008, in the FCC's Local Competition Report differs significantly from the number of end user lines calculated by Pocket during this proceeding. The Department disagrees. The total number of end user lines is dependent on the definition of "lines" used. For example, the end user switched access lines found in the FCC's Local Competition Report are reported by carriers on the FCC's Form 477,²⁰⁷ which contains specific instructions defining lines and explaining how those lines should be counted for FCC reporting purposes.

End user switched access lines reported in the FCC's Local Competition Report are determined according to how they are charged to end user customers based on voice grade equivalents, not on how they are actually provisioned. By contrast, Pocket calculates its line count by multiplying the line counts from data request responses to the end office switches and remote terminals from the LERG. As a result, the difference

²⁰⁰ Benedict PFT, p. 20.

²⁰¹ See "Cost Elements" Tab of Reciprocal Compensation and Wireless Transit cost studies, lines 1.

²⁰² See "Resource Bill of Costs" Tab of Reciprocal Compensation and Wireless Transit cost studies.

²⁰³ Benedict PFT, p. 20.

²⁰⁴ See "Cost Elements" Tab of Reciprocal Compensation and Wireless Transit cost studies, lines 1.

²⁰⁵ Benedict PFT, p. 20.

²⁰⁶ See AT&T Response to Interrogatory TE-6, File name:
TE_6_Duration_Compensation_Expense_Compensation_Percentage.xls.

²⁰⁷ The Department has taken administrative notice of the Form 477 Filing Instructions, publicly available at <http://www.fcc.gov/Forms/Form477/477inst.pdf>.

between the AT&T line count reported by the FCC and the line count calculated by Pocket stems from different counting methodologies.

The Department is not persuaded by Pocket's claims that inconsistencies in cost study inputs between AT&T's studies call into question the veracity of the cost studies.²⁰⁸ Although Pocket is correct that there are variations in inputs between the Recip Comp and Wireless TTS, those variations are based on input differences that upon closer inspection are not unreasonable.

E. REVISED RECIP COMP AND TTS RATES

Based on the above analysis, the Department hereby directs AT&T to make the following changes to its cost studies:

1. Remove the BCF from the TTS (CLEC) study.
2. Reduce the J&C mark-up for TTS so that it is consistent with the J&C mark-up for Recip Comp.
3. Change the replacement/growth line/trunk mix to 85.1% replacement and 14.9% growth.
4. Establish an effective overall proposed trunk utilization/fill factor that accounts for the cumulative interaction between the CCS assumption in the Recip Comp and TTS and the utilization/fill in the SICAT model no higher than the "midpoint" value proposed by AT&T. This can be accomplished by changing the fill factor in the SICAT model to 95%.
5. Reduce the channel mileage assumption miles to 11.43 miles in the Recip Comp and TTS (CLEC) studies.
6. Reduce the channel mileage assumption miles to 14 miles in the TTS (Wireless).
7. Increase the Lucent and Nortel line-to-trunk ratios by an increment of one additional line per trunk.

The Department has re-run the Telco's cost studies incorporating these modifications for the purpose of estimating the impact of these changes on AT&T's rates for Recip Comp and TTS services. The following table presents the revised rates for Recip Comp and TTS and compares them to the parties' proposed rates.

Rate Element	AT&T	Pocket	CLECs	Sprint	Revised
Transit (LEC)	\$0.016347	n/a	redacted	n/a	\$0.000934
Transit (Wireless)	\$0.003000	\$0.000454	n/a	redacted	\$0.000852
Recip Comp (Tandem)	\$0.002933	\$0.000700	n/a	\$0.000700	\$0.001775
Recip Comp (End Office)	\$0.001861	n/a	n/a	n/a	\$0.001092

The revised rates should be considered preliminary results. The Department directs AT&T to perform compliance runs of its cost of service studies, incorporating the above analysis on input changes, and file those compliance runs for the Department's review and approval. Final rates will be established based on the approval of AT&T's compliance runs. Further, the final Department-approved cost-based rates should be available to all CLECs and wireless carriers in Connecticut whether AT&T makes those

²⁰⁸ Benedict PFT, p. 21.

rates available by tariff, interconnection agreement or commercial agreement, subject to the change of law provisions of their respective agreements.

Finally, the Department will require that true-ups be calculated based on the final Department-approved Recip Comp and TTS rates adopted in this proceeding. Specifically, the true-up period for AT&T's Recip Comp rate began on July 17, 2009, and the true-up period for the Telco's TTS rate began on October 7, 2009. Accordingly, the Department requires AT&T and Pocket (and other carriers, when applicable) to work cooperatively to calculate applicable true-up payments once the Recip Comp and TTS rates are fully implemented in this proceeding.

IV. FINDINGS OF FACT

1. Recip Comp is the charges paid by one telecommunications carrier (Carrier A) to another (Carrier B) to compensate for the transport and termination of calls that originate with Carrier A's end users and terminate to Carrier B's end users.
2. TTS is a service that allows an originating carrier to utilize the network of an intermediate carrier to indirectly connect to one or more third-party terminating carriers.
3. The TSLRIC and the TELRIC methodologies are identical.
4. The June 15, 1995 Decision in Docket No. 94-10-01 set TSLRIC cost-based methodology principles and precepts, which require TSLRIC cost studies to be documented in a manner that the source of the data can be audited.
5. AT&T filed the Recip Comp and TTS cost studies on July 17, 2009.
6. AT&T had 100 days to file the Recip Comp and 78 days to file TTS cost studies.
7. The July 17, 2009 AT&T Recip Comp and TTS cost studies, consisted of a single Excel spreadsheet for each service and contained only summary cost information.
8. TSLRIC is an average cost methodology.
9. The Average Compensation Expense in the BCF reflects embedded cost.
10. Information passed along in a call stream or Category 11 Records provide a terminating carrier of transit traffic the information needed to bill the originating carrier directly.
11. AT&T can provide additional information to a terminating carrier, as needed, so that the terminating carrier may bill the originating carrier directly for terminating transit traffic.
12. Some CLECs in Connecticut have default bill-and-keep arrangements in place with each other and with AT&T.

13. AT&T's BCF ignores the Recip Comp arrangements established between originating and terminating carriers and eliminates the benefits of bill-and-keep Recip Comp arrangements.
14. AT&T did not demonstrate that it pays for termination of CLEC-originated transit traffic on behalf of the originating CLEC.
15. AT&T's Average Compensation Expense lacks transparency, cannot be audited, and is not based on actual billings or payments for termination of transit traffic.
16. There is no evidence that a hybrid network of soft switches and circuit switches is necessarily the least cost configuration for AT&T in Connecticut.
17. The most efficient technology to be used in a TSLRIC study must be available to the industry and be compatible with the existing infrastructure.
18. There is no evidence that replacing all of AT&T's switches with soft switches would be operationally feasible or compatible with AT&T's existing infrastructure.
19. AT&T is not using soft switches throughout its 22-state ILEC territory and has no plans to deploy any in Connecticut at this time.
20. The J&C mark-up applied to TSLRIC cost studies must reflect a reasonable projection of the ILEC's forward-looking cost.
21. AT&T's proposed J&C mark-up is less than the J&C mark-up applied to AT&T's interim TTS rates.
22. AT&T is experiencing negative growth in lines and trunks and anticipating negative growth in the foreseeable future.
23. AT&T's replacement/growth mix proposal assumes significant positive growth.
24. The Virginia Arbitration Order's methodology for calculating the replacement/growth mix employed an objective algorithm and used data that can be verified.
25. A TTF has been agreed to between AT&T and Pocket.
26. Inclusion of DS1 Expense in the cost studies is consistent with cost causation principles.
27. Inclusion of Transport Facilities Termination and Transport Facilities in the cost studies reflects the prevailing interconnection arrangements AT&T has with wireless carriers in Connecticut.
28. The node counts in AT&T's cost study reflect the actual number of nodes employed in the Telco's network.
29. AT&T's DS1 electronics cost inputs come directly from the Telco's contract with equipment vendors.

30. AT&T failed to demonstrate the reasonableness of the line-to-trunk ratios used in SICAT.
31. There are computational errors in the SICAT model in Tabs LU BOC and NT BOC.

V. CONCLUSION AND ORDERS

A. CONCLUSION

AT&T's July 17, 2009 cost studies filed, in support of its Recip Comp and TTS rates, failed to meet the requirements established in Docket No. 94-10-01. AT&T's failure to provide these cost studies in a timely basis has also negatively impacted the Department and the parties' ability to thoroughly analyze them.

The Department also concludes that AT&T failed to meet its burden of proof in support of a number of aspects of the cost studies. Nevertheless, it is in the public interest to utilize these cost models and algorithms as a guide to develop rates. The Department has made several modifications to the Telco's cost study inputs to develop Recip Comp and TTS rates. The Department directs the Telco to perform compliance runs of its cost of service studies that incorporates the Department's modifications. Lastly, the Department-approved TSLRIC rates should be available to all CLECs and wireless carriers in Connecticut whether AT&T makes those rates available by tariff, interconnection agreement or commercial agreement, subject to the change of law provisions of their respective agreements.

B. ORDERS

For the following Orders, please submit an original and three copies of the requested material, identified by Docket Number, Title and Order Number to the Executive Secretary. Compliance with Orders shall commence and continue as indicated or until compliance is no longer required after a certain date.

1. No later than May 19, 2010, the Telco shall perform a compliance run of its cost of service studies incorporating the modifications discussed above and file those studies with the Department.
2. No later than 15 days after the Department's compliance approval, AT&T shall make the Recip Comp and TTS rates available to all respective carriers whether the Telco offers those rates by tariff, interconnection agreement or commercial agreement.
3. AT&T and Pocket (and other carriers, when applicable) shall work cooperatively to determine any true-up payments that are required pursuant to the Decisions in Docket No. 08-10-29 and Docket No. 08-12-04. The parties shall report to the Department any applicable true-up payments within 30 days of the Department approving final rates.

DOCKET NO. 09-04-21 DPUC INVESTIGATION INTO THE SOUTHERN NEW
ENGLAND TELEPHONE COMPANY'S COST OF
SERVICE RE: RECIPROCAL COMPENSATION

This Decision is adopted by the following Commissioners:

Anthony J. Palermino

Kevin M. DelGobbo

Amalia Vazquez Bzdyra

CERTIFICATE OF SERVICE

The foregoing is a true and correct copy of the Decision issued by the Department of Public Utility Control, State of Connecticut, and was forwarded by Certified Mail to all parties of record in this proceeding on the date indicated.

K. Santopietro

Kimberley J. Santopietro
Executive Secretary
Department of Public Utility Control

April 15, 2010

Date

Appendix A – Service List

Service List for Docket # or Category:
09-04-21

P = Party	IN = Intervenor	TS = To Be Served	PC - Participant	
<p>Rep of COMTECH21, LLC Michael Agli Regulatory COMTECH21, LLC One Barnes Park South Wallingford, CT 06492 P Lmatosian@comtech21.com</p>	<p>Rep of MBROCAST Josh Barstow Vice President of Advanced Services MetroCast 9 Apple Road Belmont, NH 03220 P jbarstow@metrocast.com</p>	<p>Rep of WILLIAMS LOCAL NETWORK, LI Wendy Brant Atty., Dir. of Regulatory Affairs Williams Local Network, LLC One Technology Center Mail Drop TC-7B Tulsa, OK 74103 P</p>	<p>Rep of 1-800-RECONEX, INC. William E. Braun Dir. Regulatory/General Counsel 1-800-RECONEX, Inc. 2500 Industrial Avenue Hubbard, OR 97032 P</p>	
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<p>Rep of TRANS NATIONAL COMMUNICA Stella Gnepp Regulatory Affairs Specialist Trans National Communications International 2 Charlesgate West Boston, MA 02215 P sgnepp@tncii.com</p>	<p>Rep of NEUTRAL TANDEM Mr. John R. Harrington Jenner & Block LLP 330 N. Wabash Ave Suite 4700 Chicago, IL 60611 P jharrington@jenner.com</p>	<p>Rep of CHIMENET Matthew T. Hoey, III Director of Operations ChimaNet 110 Barnes Road Wallingford, CT 06492 P</p>	
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<p>Rep of ZTAR MOBILE, INC. Kevin Haddad President Ztar Mobile, Inc. 951 N. Walnut Creek Drive, Suite C Mansfield, TX 76063 P</p>	<p>Rep of AMERICAN FIBER NETWORK, IN Robert E. Heath Executive Vice President American Fiber Network, Inc. 9401 Indian Creek Parkway Suite 140 Overland Park, KS 66210 P robh@sbcglobal.net</p>	<p>Rep of COX CONNECTICUT TELCOM, LI Robert J. Howley, Esq. New England Manager-Regulatory Affairs Cox Connecticut Telecom, LLC 170 Utopia Rd. Manchester, CT 06040 P roberthowley@cox.com</p>	
<p>Rep of PNG TELECOMMUNICATIONS, II Mary Hampton Tax Specialist PNG Telecommunications, Inc. d/b/a PowerN 100 Commercial Drive Fairfield, OH 45014-5556 P tax@pngemail.com</p>	<p>Rep of QWEST INTERPRISE AMERICA, I Marjorie O. Herlth Qwest Interprise America, Inc. 1801 California Street 10th Floor Denver, CO 80202 P Marjorie.Herlth@qwest.com</p>	<p>Rep of MATRIX TELECOM Dana Hoyle Manager of Regulatory Affairs Matrix Telecom d/b/a Matrix Business Techn 7171 Forest Lane, Ste 700 Dallas, TX 75230 P dhoyle@matrixbt.com</p>	

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<p>Rep of ARC NETWORKS, INC. D/B/A INF Adam Lewis Regulatory A.R.C. Networks, Inc. d/b/a InfoHighwy 175 Pinelawn Road Melville, NY 11747 P</p>	<p>Rep of CONSUMER CELLUAR, INC. John Marick President Consumer Celluar, Inc. 7204 SW Durham Road, Suite 300 Portland, OR 97224 P</p>	<p>Rep of GLOBAL CROSSING LOCAL SER Barbara A. McNair Regulatory Analyst Global Crossing Companies 225 Kenneth Drive Rochester, NY 14623 P</p>	
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<p>Rep of PAETEC COMMUNICATIONS, INC Judy Messenger Regulatory & Tariff Analyst PaeTec Communications, Inc. One PaeTec Plaza 600 Willowbrook Office Park Fairport, NY 14450 P judy.messenger@paetec.com</p>	<p>Rep of BANDWIDTH.COM Mr. David Morken Regulatory Bandwidth.com 4001 Weston Parkway, Suite 100 Cary, NC 27513 P dmorken@bandwidth.com</p>	<p>Rep of ATC OUTDOOR DAS, LLC Mr. David Pierce Director ATC Outdoor DAS, LLC 400 Regency Forest Drive Suite 300 Cary, NC 27518 P david.pierce@americantower.com; janet.walt</p>	
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Prepared by: Sharon D. Perez

122 Date: December 1, 2009