

**DIRECT TESTIMONY OF JAMES R. SMALLWOOD
ON BEHALF OF AMERITECH ILLINOIS**

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ILLINOIS
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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is James R. Smallwood. My business address is One Bell Center, 38-X-08, St. Louis, Missouri 63101.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by SBC Telecommunications, Inc. as Associate Director-Cost Analysis and Regulatory. I provide services for all of SBC's incumbent local exchange carriers, including Ameritech Illinois.

Q. WHAT ARE YOUR RESPONSIBILITIES AS ASSOCIATE DIRECTOR-COST ANALYSIS AND REGULATORY?

A. I am responsible for:

1. Coordinating the development of cost methods and the production of cost studies that determine the costs incurred in providing Ameritech's services and unbundled network elements; and,
2. Analyzing cost study results.

Q. HAVE YOU PREPARED AN APPENDIX WHICH SUMMARIZES YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE?

A. Yes. It is attached as Schedule JRS-1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to explain how the recurring and nonrecurring costs for line sharing were developed for Ameritech Illinois. Second, I will be introducing a revised nonrecurring cost study, which is attached to my testimony as Schedule

1 JRS-2. The revised cost study incorporates corrections to underlying assumptions for
2 crossconnections. Finally, I will respond to certain criticisms of Ameritech Illinois'
3 cost studies raised by Ms. Terry Murray and Mr. Joseph P. Riolo submitted on behalf
4 of Rhythms Links Inc. and Covad Communications Company.

5 **Q. WERE THE COST STUDIES THAT SUPPORT AMERITECH ILLINOIS'**
6 **PROPOSED RECURRING AND NONRECURRING CHARGES FOR LINE**
7 **SHARING FILED WITH THIS COMMISSION?**

8 A. Yes. The cost studies supporting Ameritech Illinois' line sharing offering were
9 submitted to the Illinois Commerce Commission on April 21, 2000 under advice
10 number 7280.

11 **Q. WERE THE COST STUDIES AMERITECH IS SUBMITTING IN THIS**
12 **PROCEEDING TELRIC BASED?**

13
14 A. Yes. The cost studies are all based on TELRIC methodology as defined by the
15 FCC and implemented by the Illinois Commission. These studies reflect the
16 approved input assumptions based on the Illinois Commission's order of February
17 18, 1998, in ICC Docket No. 96-0486/0569 (Consol.) (TELRIC proceeding). The
18 average shared and common cost percentages resulting from Ameritech Illinois'
19 compliance with the Commission's TELRIC order are applied to TELRIC costs for
20 HFPL line sharing elements to derive Ameritech Illinois' proposed pricing. In
21 addition, the proposed loop charge is 50% of the loop rate resulting from this same
22 Commission order.

23 **Q. WHAT RECURRING COSTS HAVE BEEN IDENTIFIED FOR THE HFPL**
24 **LINE SHARING SERVICE?**

25 A. The recurring costs associated with line sharing consists of three cost elements.
26 These cost elements are:

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The recurring cost for the tie-cables, which is the recurring component of the crossconnect element;
The splitter costs (when owned by the ILEC); and,
The cost for Operations Support Systems ("OSS") modifications.

Recurring costs were developed for two different scenarios. The first scenario is when Ameritech Illinois owns the splitter that is used to provision line sharing. In this case, the recurring costs include all three of the elements listed above. The second scenario occurs when the competitive local exchange carrier ("CLEC") owns the splitter. In this second scenario, only the recurring costs for tie-cables and OSS modifications are applicable.

Q. WHAT ARE TIE-CABLES?

A. While all of these components are explained in greater detail in Ms. Schlackman's testimony, generally, tie-cables are cables that carry numerous circuits from one location to another within the central office. The tie-cables included in the cost study are used to connect circuits from the main distributing frame ("MDF") to the intermediate distributing frame ("IDF"). IDFs are located in 80% of Ameritech Illinois' central offices. Therefore, the cost study weights tie cable investments to reflect the fact that 20% of the time no tie cables are necessary. Tie-cables constitute the recurring portion of the crossconnect rate element.

Q. WHY ARE TWO TIE CABLES NECESSARY WHEN AN IDF IS PART OF THE CENTRAL OFFICE NETWORK ARCHITECTURE?

1 A. One tie-cable is a shielded tie cable. This tie-cable is used to carry the combined
2 voice and data circuit from the MDF to the IDF. From the IDF, the circuit is cross-
3 connected to the splitter, where the voice and data are separated. At this point, the
4 data CLEC routes the data circuit to their advanced services equipment, while the
5 voice circuit must be routed back to the ILEC's switch. Therefore, a second tie-
6 cable, which is a non-shielded tie cable, is necessary to carry the voice circuit back
7 from the IDF to the MDF so that the voice circuit can be routed to the ILEC's switch
8 for completing calls.

9 **Q. HOW WERE THE COSTS FOR TIE-CABLES DEVELOPED?**

10 A. The costs for tie-cables were developed based on investments using current vendor
11 prices. These investments are then converted to recurring monthly costs by the
12 application of annual charge factors ("ACFs") that account for both capital costs (*i.e.*,
13 depreciation, cost of money, and income taxes) and for operating expenses (*i.e.*,
14 maintenance and ad valorem taxes). As previously stated, the tie cable investments
15 were weighted to reflect that these facilities are only required in 80% of Ameritech
16 Illinois' central offices.

17 **Q. PLEASE EXPLAIN WHY THE COSTS OF BOTH TIE-CABLES ARE**
18 **ASSIGNED TO THE CLEC IN THIS LINE SHARING ARRANGEMENT?**

19 A. The costs were developed based on the TELRIC methodology and assigned based on
20 the economic principle of cost causation. Absent a line sharing arrangement, the
21 loop serving Ameritech Illinois' voice grade customer terminates at the MDF. From
22 there, that circuit would be cross-connected across the MDF to the switch. However,

1 after implementing a line sharing arrangement on behalf of a CLEC, two tie-cables
2 are required to complete the voice circuit from the loop to the switch, as described
3 previously. Therefore, it is clearly the CLEC's request to implement line sharing
4 that causes the cost associated with tie-cables, and the CLEC should be required to
5 pay that cost.

6 **Q. WHAT IS A SPLITTER?**

7 A. A splitter is a device that separates the voice and data signals. The input to the
8 splitter is a line on which the spectrum is shared allowing both voice and data to be
9 transported on that same line. The output from the splitter, for that line, is two lines,
10 one for voice and one for data.

11 **Q. HOW WAS THE COST FOR THE SPLITTER DEVELOPED?**

12 A. The monthly recurring cost for the splitter was developed using the same TELRIC
13 methodology described above for tie-cables.

14 **Q. WHAT DOES THE OSS MODIFICATION COST REPRESENT?**

15 A. The cost for OSS modification represents the costs that will be incurred by
16 SBC/Ameritech to modify its OSS systems to support line sharing.

17 **Q. HOW WAS THE MONTHLY RECURRING OSS COST DEVELOPED?**

18 A. The cost was developed based on the vendor costs of implementing the OSS
19 modification and on a product management demand forecast for the number of
20 shared lines that will be provisioned over the next three years for the entire
21 SBC/Ameritech serving area. This information was then used to compute the

1 monthly cost per line on a present value basis using the 9.52% weighted average cost
2 of capital authorized in the TELRIC proceeding.

3 **Q. DOES THE PROPOSED OSS MODIFICATION CHARGE COMPLY WITH**
4 **PARAGRAPH 144 OF THE FCC'S *LINE SHARING ORDER*?**

5 A. Yes. As explained by the FCC in this paragraph of the *Line Sharing Order*,
6 Ameritech Illinois is entitled to:

7 recover in [its] line sharing charges those reasonable incremental
8 costs of OSS modification that are caused by the obligation to
9 provide line sharing as an unbundled network element.

10 We also reaffirm...that the states may require incumbent LECs in an
11 arbitrated agreement to recover such nonrecurring costs such as
12 these incremental OSS modification costs through recurring charges
13 over a reasonable period of time;

14 As described by the FCC, the OSS costs that are to be recovered were computed over
15 a three-year period, and are based on the expected demand.

16 **WHAT NONRECURRING COSTS ARE ASSOCIATED WITH LINE SHARING?**

17 A. The nonrecurring costs for line sharing reflect the activities associated with the
18 installation and removal of crossconnect jumpers in the central office.

19 **Q. PLEASE DESCRIBE THE TASKS THAT WERE IDENTIFIED IN**
20 **DEVELOPING THE NONRECURRING COSTS FOR LINE SHARING.**

21 The nonrecurring costs in this cost study are for the following tasks:

22
23 Disconnecting the jumper that connects the plain old telephone service ("POTS")
24 loop to the switch;

25 Establishing new jumpers at the MDF and the IDF (when necessary); and,

26 Performing tests to ensure continuity.

1 **Q. HOW WERE THE NONRECURRING CROSSCONNECT COSTS**
2 **DEVELOPED?**

3 A. A network subject matter expert (“SME”) identified the central office forces
4 workgroup as having responsibility for performing the necessary crossconnect
5 activities. In addition, the network SME provided input on the specific activities
6 required to perform the crossconnect functions. After identifying the discrete tasks
7 involved, the same SME provided the forward-looking activity times associated with
8 the tasks. The information provided also included the activity code of the personnel
9 performing the discrete work steps. Once these data are obtained, the final
10 nonrecurring costs are developed by applying the appropriate labor rate to each of the
11 time estimates.

12 **Q. DURING THE COURSE OF PREPARING FOR THIS PROCEEDING, DID**
13 **YOU BECOME AWARE OF ANY INFORMATION NECESSITATING**
14 **CORRECTIONS TO THE NONRECURRING COST STUDY?**

15 A. Yes.

16 **Q. PLEASE EXPLAIN THE NATURE OF THE CORRECTIONS REQUIRED TO**
17 **AMERITECH ILLINOIS’ NONRECURRING COST STUDY FOR LINE**
18 **SHARING.**

19 A. There were three assumption modifications made with regard to the number of
20 crossconnect jumpers required. The first modification addresses a service design
21 change in which Ameritech Illinois determined to use splitter line cards with test
22 access points rather than an external test access capability. This reduces the number
23 of crossconnect jumpers from six to five.

1 The second modification relates to splitter ownership. In the original study, it was
2 assumed that the data line from the splitter would terminate at an IDF regardless of
3 splitter ownership. Further discussions with Network personnel revealed that when a
4 CLEC owns the splitter, the CLEC will hardwire the data line directly from the
5 splitter to their DSLAM. Recognizing this fact, reduces the number of crossconnect
6 jumpers required from five to four only in those cases where the CLEC owns the
7 splitter.

8 Finally, a third modification was made to recognize the fact that 20% of Ameritech
9 Illinois' central offices will not have an IDF. Incorporating this fact into the
10 nonrecurring cost study reduces the number of crossconnect jumpers to three when
11 the splitter is ILEC owned and two when the splitter is CLEC owned. This only
12 applies to the 20% of offices that do not have an IDF.

13 **Q. HAVE YOU REVISED THE NONRECURRING COST STUDY TO**
14 **REFLECT THESE MODIFICATIONS?**

15 A. Yes. The nonrecurring cost study was corrected to reflect these changes to the
16 underlying assumptions. The corrected nonrecurring cost study has been attached as
17 Schedule JRS-2.

1 **RESPONSES TO THE TESTIMONY OF MS. MURRAY AND MR. RIOLO**

2 **Q. AT PAGE 8 MS. MURRAY ALLEGES THAT THE ILLINOIS**
3 **COMMISSION SHOULD REQUIRE LINE SHARING ON FIBER FED**
4 **LOOPS. HAS AMERITECH ILLINOIS' PREPARED A COST STUDY IN**
5 **SUPPORT OF THIS OPTION? IF NOT, WHY NOT?**

6 A. No. A study was not conducted for fiber based line sharing. The FCC's rules at
7 47 C.F.R. 51.319(h)(1) defines the unbundling requirement for the high frequency
8 portion of the loop "as the frequency range above the voiceband on a copper loop
9 facility..." (emphasis added) Therefore, a cost study is not required.

10 **Q. AT PAGES 15-27 OF HER TESTIMONY, MS. MURRAY ARGUES THAT**
11 **NO INCREMENTAL COST OF THE LOOP SHOULD BE ALLOCATED TO**
12 **THE HIGH FREQUENCY PORTION OF THE LOOP. HOW DO YOU**
13 **RESPOND?**

14

15 A I agree with Ms. Murray that any allocation of loop costs among two service
16 providers in a line sharing arrangement is necessarily arbitrary. A reasonable
17 allocation, then, is to split the cost of the loop between voice and data at 50/50. As
18 proposed by Ms. Rhonda Meyer.

19 **Q. MS. MURRAY STATES (PAGE 15) THAT THE COMMISSION SHOULD**
20 **ADOPT RHYTHM'S AND COVAD'S PROPOSED PRICES FOR UNES AND**
21 **INTERCONNECTION ARRANGEMENTS RELATED TO LINE SHARING.**
22 **DO YOU AGREE?**

23 A. No.

1 **Q. WHY NOT?**

2 A. According to Ms. Murray's testimony, (Page 31) the cost basis for the prices
3 proposed by Rhythms and Covad is the unreviewed and unproven High Bandwidth
4 Services Overlay Model (HBSOM). This model and its resulting cost output were
5 submitted with testimony on May 18, 2000. Besides not possessing all the backup
6 documentation necessary to examine the costs and the model, Ameritech has had
7 less than one week to review the model and the inputs. Appropriate review of a
8 new model and subsequent discovery would take much longer than one week to
9 provide a thorough examination.

10 **Q. WHAT IS THE UNDERLYING STRUCTURE OF THE HBSOM MODEL?**

11 A. While I haven't examined the model, it is my understanding that the HBSOM
12 Model is based on the structure and inputs of the Hatfield Model, now known as the
13 HAI Model.

14 **Q. WAS THE HATFIELD OR HAI MODEL INTRODUCED IN PRIOR UNE**
15 **PROCEEDINGS IN ILLINOIS?**

16 A. Yes, it was introduced by AT&T and subsequently withdrawn in Illinois, and the
17 Hatfield model was specifically rejected in Texas in favor of SBC's cost models.
18 Further, a very cursory review of the input assumptions to the HBSOM model
19 suggests that the model inputs may not be compliant with the order in the Illinois

1 TELRIC proceeding.

2 **Q. WHEN DOES AMERITECH PERFORM LOOP CONDITIONING**
3 **ACTIVITIES?**

4 A. As Ameritech Illinois' testimony in ICC Docket No. 99-0593 contended, loop
5 conditioning is always done at the CLEC request. The UNE Loop Conditioning
6 Charge is only applicable if the CLEC requests it and we actually have to remove
7 inhibitors. Therefore, cost causation principles dictate that the CLEC pay for the
8 costs incurred. As the referenced docket has a more complete record on this issue,
9 Ameritech Illinois will not restate it's positions in this customer-specific arbitration
10 proceeding.

11 **Q. AT PAGE 45 OF MS. MURRAY'S TESTIMONY, SHE STATES THAT THE**
12 **PRICE FOR LOOP QUALIFICATION SHOULD BE ZERO. FROM A**
13 **COSTING PERSPECTIVE, DO YOU AGREE WITH MS. MURRAY'S**
14 **ASSESSMENT?**

15 A. No. The FCC, in its UNE Remand Order at Para. 429, determined that ILECs are not
16 required to populate databases related to loop qualification for CLECs. Therefore,
17 on a forward-looking basis, there will be a non-zero cost associated with loop
18 qualification. Based on the economic principle of cost causer pays, CLECs should
19 pay for loop qualification.

20 **Q. BOTH MS. MURRAY (PAGES 46 THROUGH 59) AND MR. RIOLO**
21 **(PAGES 17 THROUGH 21) PROVIDE SEVERAL CRITICISMS OF**
22 **AMERITECH ILLINOIS' RECURRING AND NONRECURRING COST**

1 **STUDIES FOR LINE SHARING. HOW DO YOU RESPOND?**

2

3 A. First Ms. Murray and Mr. Riolo claim that the markup for shared cost as applied to

4 Line Sharing elements is unsupported. However, the shared cost loading that

5 Ameritech Illinois applied was, in fact, fully supported and litigated during the

6 course of the Illinois TELRIC proceeding. It is, therefore, appropriate that Line

7 Sharing prices similarly contribute to the recovery of Ameritech Illinois' shared and

8 common costs.

9 Secondly, Ms. Murray and Mr. Riolo criticize the factors that were applied to

10 material "investments to capture installation costs." (Murray Testimony, pg. 50) Ms.

11 Murray misrepresents the costs reflected in the application of Ameritech's In Plant

12 factors. In Plant factors are uniquely developed for Hardwire Equipment and Plug In

13 Other Costs and represent the relationship between total installed costs and material

14 investment costs. Total installed costs in the case of Hardwired Equipment includes

15 material costs plus applicable taxes, engineering and labor (both vendor supplied and

16 telco supplied) and miscellaneous costs such as transportation, hauling and hoisting,

17 and warehousing. Similarly, the In Plant factor for Plug In Other Costs reflects a

18 loading on plug in investments to recover taxes, transportation and other material

19 handling costs. Labor for installation of plug ins is not included in the factor but

20 rather reflected in Ameritech Illinois' TELRIC non recurring cost study.

1 **Q. MS. MURRAY AND MR. RIOLO CRITICIZE AMERITECH ILLINOIS'**
2 **COST STUDIES, CLAIMING THAT THEY ARE "FLAWED" AND**
3 **"POORLY SUPPORTED" AND THEREFORE CONCLUDES THAT**
4 **AMERITECH ILLINOIS' COST STUDIES SHOULD NOT BE RELIED**
5 **UPON BY THIS COMMISSION FOR PRICING OF LINE SHARING. HOW**
6 **DO YOU RESPOND?**

7 A. Contrary to Ms. Murray's contentions, the cost study documentation provided to this
8 Commission in support of Ameritech Illinois' proposed rates for Line Sharing are
9 well documented and supported and their findings/criticisms are without merit.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A. Yes.

12

Schedule JRS-1
(Smallwood)

**SUMMARY OF EDUCATION AND WORK EXPERIENCE OF
JAMES R. SMALLWOOD**

Educational Background

WHAT IS YOUR EDUCATIONAL BACKGROUND?

- A. I hold both a Bachelor of Arts degree and a Master of Science degree in Economics from Southern Illinois University - Edwardsville. I also hold a Bachelor of Science degree in Electronics Management from Southern Illinois University - Carbondale. In addition to my formal education, I have also attended basic and advanced electronics and communications courses while serving in the United States Navy.

Work Experience

Q. PLEASE OUTLINE YOUR WORK EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.

- A. I was employed by SBC Telecommunications, Inc., in April 1999. My current position is Associate Director -Cost Analysis and Regulatory. In that position, I am responsible coordinating the development of cost methods and the production of cost studies that determine the costs incurred in providing Company services or elements and analyzing cost study results. Prior to my employment at SBC Telecommunications, Inc., I worked as an analyst in the consulting industry specializing in telecommunications from 1995 to 1999. In addition, I served for seven years in the United States Navy as an Electronics Technician specializing in satellite communications.

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Cover&TOC

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
2001 Study

Ameritech - Illinois
Unbundled Network Elements
Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
(HFPL)

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Cover&TOC

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
 2001 Study

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TAB 1

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
 2001 Study

COST STUDY OVERVIEW

STUDY PURPOSE

Wholesale Marketing has requested the development of nonrecurring costs for the High Frequency Portion of the Loop (Line Sharing) to comply with the FCC UNE Remand Order.

SERVICE DESCRIPTION

This study includes the nonrecurring costs associated with the Cross Connects for the Unbundled Network Element: High Frequency Portion of the Loop.

STUDY METHODOLOGY

The costs for this study were developed using TELRIC methodology.

STUDY ASSUMPTIONS

Labor Rates based on Year 2001 wages, Cost of Money = 9.52%, 2 year location life.
 Competitive Local Exchange Carrier (CLEC) or Ameritech-Illinois owns the splitter equipment
 One Loop is converted per Order
 The existing Analog UNE Loop Service Order applies for this service
 The Network division determined that 80% of the central offices will have an Intermediate Distributing Frame (IDF) and 20% will not
 ILEC owned splitter with an IDF requires 5 crossconnects
 CLEC owned splitter with an IDF requires 4 crossconnects
 ILEC owned splitter without an IDF requires 3 crossconnects
 CLEC owned splitter without an IDF requires 2 crossconnects

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TAB 2

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
 2001 Study

TOTAL INCREMENTAL COST TEST

Line	Description	Source	Value
------	-------------	--------	-------

Not Applicable

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TAB 3

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
 2001 Study

UNIT RATE AND COST SUMMARY

Line	Description	USOC	Rate Source	Rate	TELRIC Cost	Cost Source
	<u>Cost for Crossconnects</u>					
1	ILEC Owned Splitter		N/A	N/A	\$77.92	TAB 6.0, L1
2	CLEC Owned Splitter		N/A	N/A	\$66.33	TAB 6.0, L2

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TAB 4

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
2001 Study

DEMAND FORECAST

LINE	DESCRIPTION	SOURCE	YR1	YR2	YR3
------	-------------	--------	-----	-----	-----

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TAB 5

Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
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RECURRING COSTS SUMMARY

LINE	DESCRIPTION	SOURCE	VALUE
------	-------------	--------	-------

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**Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
2001 Study**

NONRECURRING COSTS SUMMARY

LINE	DESCRIPTION	A	B	C	D	TELRIC Cost
------	-------------	---	---	---	---	-------------

	<u>Cost for Crossconnects - Initial Line</u>	<u>Cost With IDF</u>	<u>Cost Without IDF</u>	<u>1*Column A</u>	<u>2*Column B</u>	<u>Sum of C and D</u>
1	ILEC Owned Splitter	\$80.96	\$65.72	64.77144	13.14466	\$77.92
		(Page 3) TAB 6.1.1.1, L4	TAB 6.1.1.3, L4			
2	CLEC Owned Splitter	\$69.38	\$54.13	55.50744	10.82686	\$66.33
		(Page 3) TAB 6.1.1.2, L4	TAB 6.1.1.4, L4			

Above costs do not include shared nor common costs

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Ameritech - Illinois
Unbundled Network Elements - Nonrecurring Costs
High Frequency Portion of the Loop (Line Sharing)
2001 Study

Cost for Crossconnects - Service - Initial Circuit Installation - ILEC Owned Splitter with an IDF

WORK GROUPS	A Yr 2000 LABOR RATES TAB 6.1	B ADMIN TIME (HOURS) TAB 6.1.2	C ADMIN COST (A*B)	D DSGN & CO TIME (HOURS) TAB 6.1.2	E DSGN & CO COST (A*D)	F CUST CON. TIME (HOURS) TAB 6.1.2	G CUST CON. COST (A*F)	DESCRIPTION OF WORK GROUPS
FOG	\$47.60	0.1333	\$6.35	0.8000	\$38.08	0.0000	\$0.00	Field Operations Group
1. SUBTOTAL			\$6.35		\$38.08		\$0.00	
2. S.O. Computer Process Cost Source:			\$0.00					
3. TOTAL (L1 + L2)			\$6.35		\$38.08		\$0.00	

Summary:
 Total Administrative Cost: \$6.35
 Design & Central Office Cost: \$38.08
 Customer Connection Cost: \$0.00
 Cost for Crossconnects \$44.43

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