1   the June 21, 2002, 32nd Supplemental Order in Docket No. UT-003013, the

2   Commission stated that the Verizon ICM model did not provide for either

3   structure sharing or loop length adjustments and ordered Verizon to make such

4   changes to the ICM cost model. (*See id.* ¶¶ 345-47, 354-55). Despite these prior

5   Commission orders, including prior directives aimed directly at Verizon's cost

6   model, Verizon has failed to include in VzCost the ability to adjust costs based on

7   loop length differences or to alter structure sharing assumptions. The VzCost

8   model does not comply with prior Commission orders because it fails to

9   accommodate input choices for calculating UNE TELRIC costs that this

10   Commission repeatedly has ordered.

11

12 **Q.**   **How do the loop lengths produced by VzCost compare with the updated**

13   **actual loop length data submitted by Verizon?**

14 **A.**   Exhibit C- ___ (TLS-14) shows a comparison between the actual and modeled

15   loop lengths. The comparison shows that the loop lengths produced by VzCost

16   vary widely from the updated actual loop lengths and are on average 54 percent

17   longer than the updated actual loop lengths for Verizon's wire centers. The

18   longer loop lengths mean that the VzCost model significantly overstates

19   Verizon's loop cost in Washington.

RESPONSE TESTIMONY OF   Exhibit T- ____ (TLS-12T)
THOMAS L. SPINKS   April 20, 2004
Docket No. UT-023003
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