Docket No. UT-023003
AT&T Responses to Commission Bench Requests
June 23, 2004

Bench Request No. 4:

Please provide the rate of return that is associated with the cost estimate of $23.66 that appears on Table 2 at page 13.

Response:

The $23.66 value appearing in Table 2, page 13 of Mr. Lundquist's Rebuttal Testimony is derived from a disaggregation of Verizon's claimed embedded recurring cost for an unbundled "loop" (i.e., $27.44, as stated at Dye Reply Testimony, page 2, line 6). Thus, it reflects the rate of return assumed in Verizon's embedded cost analysis, which is 11.25%. See Dye Reply Testimony, at page 8, lines 10-12. As observed at pages 8-9 of Mr. Lundquist's Rebuttal Testimony, 11.25% is an excessively high cost of capital assumption, so that a more realistic rate of return value would produce an embedded cost for unbundled voice grade loops even lower than $23.66.

Prepared by Scott Lundquist

Docket No. UT-023003
AT&T Responses to Commission Bench Requests
June 23, 2004

Bench Request No. 17:

Please provide the number of utility poles that are assumed to be deployed in the HAI modeled network.

Response:

The following represents pre-structure sharing pole counts (but post network sharing, i.e. distribution shared with feeder and feeder shared with interoffice) for HM 5.3 Revised:

Distribution poles:	180,971
Feeder Poles:	30,979
Interoffice Poles:	14,835
Total Poles:	226,785

Prepared by Douglas Denney

Docket No. UT-023003
AT&T Responses to Commission Bench Requests
June 23, 2004

Bench Request No. 18:

Please undertake a comparison between HM 5.3 Revised and VzLoop of the loop distribution lengths, route or strand distances, and loop length distances by density zone.

Response:

Enclosed is an Excel spreadsheet with the requested comparison, and background information on how the comparison was calculated. The blank cells in the spreadsheet reflect insufficient data from VzLoop in the record.

Loop Distance
Comparison.xls

Prepared by Douglas Denney

Docket No. UT-023003
AT&T Responses to Commission Bench Requests
June 23, 2004

Bench Request No. 19:

Please provide the median and average lines per SAI in the five geographically deaveraged zones for Verizon's local service territory in Washington.

Response:

The information requested is contained in the attached Excel spreadsheet.

SA Data.xls

Prepared by Douglas Denney

Docket No. UT-023003
AT&T Responses to Commission Bench Requests
June 23, 2004

Bench Request No. 20:

Please provide the workpapers associated with work that has been performed to make the analysis in Dr. Mercer's Reply Testimony (Exhibit 861T) on page 29.

Response:

AT&T modified the HM 5.3 model distribution calculations so that the 1) copper versus fiber feeder decision; and 2) the decision as to whether a cluster needed to be split to maintain maximum copper loop lengths less than 18,000 feet are made assuming the longest loop runs to within three drop lengths of the corner of the cluster. This ensures there is more than enough cable to reach a house located near the front of a lot that is one drop length wide and two drop lengths deep. The statewide loop cost increased from $7.64 to $7.86, a $0.22 difference. The density zone output of the run with the modified distribution module calculation is embedded below.

"WA_Verizon_cluster
split_DZ.xls"

This comparison was made using the version of HM 5.3 that existed at the time Dr. Mercer's response testimony was filed. If the same comparison is made with HM 5.3 Revised submitted on June 4, 2004, the difference is $0.19.

Prepared by Robert Mercer