

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO BENCH REQUEST

DATE PREPARED: December 29, 2004  
DOCKET NO.: UT-023003  
REQUESTER: Bench

WITNESS: Thomas Spinks  
RESPONDER: Thomas Spinks  
TELEPHONE: (360) 664-1365

**Bench Request No. 26**

Please explain which inputs to the HM 5.3 model should be modified so that the model uses the ratio of 2000 DEMS divided by 2000 access lines when developing traffic sensitive switching costs. Please show all data and calculations.

**Staff Response to Bench Request No. 26**

The DEMs can be modified in HAI 5.3 as follows: Using Windows Explorer, open the HM53 directory, then select and open the ARMIS folder. The DEM inputs are located in cells F-119 to F-121. Staff is not certain where line counts would need to be changed in the model for developing traffic sensitive switching cost. In prior proceedings, line counts were modified in the cluster database using a Wirecenter Template utility. Staff believes the utility may be used to modify the line counts for the current HAI model. The utility is provided on the attached CD-ROM.

Alternatively, it appears that usage sensitive switching costs may be calculated by updating wire center line counts in column B, tab Investment Input, in the expense module and assigning a traffic sensitive percent of switching cost in the Inputs tab cell C-56. It may also be useful to the Commission be aware that Ex. 860, a corrected version of HAI filed during the proceeding requires correction for wirecenter runs. When Staff attempted to re-run its scenarios on a wire center basis using Ex. 860, the output was populated with divide-by-zero errors. Mr. Denney from AT&T was able to correct the problem and provided Staff with a corrected distribution module, which is also included on the CD-ROM.

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**Bench Request No. 27**

Please provide detailed step-by-step instructions explaining how to map the output from the cost model(s) AT&T has sponsored in this proceeding to each UNE rate element for which AT&T has provided a cost estimate.

**Staff Response to Bench Request No. 27**

Staff is not certain as to the context for asking how to “map the output from the cost model to the UNEs.” If the context for the question is related to the similar request for Verizon to show how it maps the VzCost elements to UNEs, the response is that to the best of Staff’s knowledge, the HAI model directly calculates UNE costs as output from the model. There is no intermediate calculation of cost elements that must then be mapped to the UNEs.

Alternatively, if the context for the mapping is to show how, for example, the total network investment is assigned to the DS-1 and DS-3 UNEs as discussed in AT&T’s opening brief, the response is that Staff has not performed that analysis. If the Commission requests Staff to undertake that analysis, Staff would require additional guidance from the Commission regarding the scope of that analysis before Staff could anticipate when it would be able to complete it.