VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS

		Adjust. Factor	**1.03149**
	Weighting	**VZ**	**0.60**
		HM 5.3	**0.40**

UNBUNDLED NETWORK ELEMENT/SERVICE	**VZ Rates**	**HM Rates**	**Weighted Rate**
LOCAL LOOPS			
2 Wire Basic Unbundled Loop - Density Cell 1	$ 14.26	$ 10.56	$ 13.05
2 Wire Basic Unbundled Loop - Density Cell 2	$ 24.71	$ 23.42	$ 24.66
2 Wire Basic Unbundled Loop - Density Cell 3	$ 46.53	$ 47.22	$ 47.69
2 Wire Basic Unbundled Loop - Density Cell 4	$ 113.00	$ 82.73	$ 103.03
2 Wire Basic Unbundled Loop - Density Cell 5	$ 292.98	$ 142.21	$ 238.21
2 Wire Basic Unbundled Loop - Statewide Average	$ 19.34	$ 17.21	$ 18.85
2 Wire Digital-ISDN-BRI Loop - Density Cell 1	$ 22.54		$ 23.25
2 Wire Digital-ISDN-BRI Loop - Density Cell 2	$ 41.14		$ 42.44
2 Wire Digital-ISDN-BRI Loop - Density Cell 3	$ 84.78		$ 87.45
2 Wire Digital-ISDN-BRI Loop - Density Cell 4	$ 221.51		$ 228.49
2 Wire Digital-ISDN-BRI Loop - Density Cell 5	$ 678.25		$ 699.61
2 Wire Digital-ISDN-BRI Loop - Statewide Average	$ 32.22		$ 33.23
4 Wire - 4 Wire Customer Specified Signalling Loop - Density Cell 1	$ 41.54		$ 42.85
4 Wire - 4 Wire Customer Specified Signalling Loop - Density Cell 2	$ 62.87		$ 64.85
4 Wire - 4 Wire Customer Specified Signalling Loop - Density Cell 3	$ 107.29		$ 110.67
4 Wire - 4 Wire Customer Specified Signalling Loop - Density Cell 4	$ 242.98		$ 250.63
4 Wire - 4 Wire Customer Specified Signalling Loop - Density Cell 5	$ 614.98		$ 634.35
4 Wire - 4 Wire Customer Specified Signalling Loop - Statewide Average	$ 51.91		$ 53.54
Digital 4 Wire (56KD-64KD) Loop - Density Cell 1	$ 46.44		$ 47.90
Digital 4 Wire (56KD-64KD) Loop - Density Cell 2	$ 67.77		$ 69.90
Digital 4 Wire (56KD-64KD) Loop - Density Cell 3	$ 112.18		$ 115.71
Digital 4 Wire (56KD-64KD) Loop - Density Cell 4	$ 247.87		$ 255.68
Digital 4 Wire (56KD-64KD) Loop - Density Cell 5	$ 619.87		$ 639.39
Digital 4 Wire (56KD-64KD) Loop - Statewide Average	$ 56.80		$ 58.59
2 Wire Customer Specific Signalling Loop - Density Cell 1	$ 16.77		$ 17.30
2 Wire Customer Specific Signalling Loop - Density Cell 2	$ 27.44		$ 28.30
2 Wire Customer Specific Signalling Loop - Density Cell 3	$ 49.65		$ 51.21
2 Wire Customer Specific Signalling Loop - Density Cell 4	$ 117.49		$ 121.19
2 Wire Customer Specific Signalling Loop - Density Cell 5	$ 303.49		$ 313.05
2 Wire Customer Specific Signalling Loop - Statewide Average	$ 21.95		$ 22.64
DS1 Loop -Statewide Average	$ 115.16	$ 96.96	$ 110.06
DS-3 Loop - Statewide Average	$ 680.05	$ 822.40	$ 749.84
2 Wire xDSL Loop - Density Cell 1	$ 14.26	$ 10.56	$ 13.05
2 Wire xDSL Loop - Density Cell 2	$ 24.71	$ 23.42	$ 24.66
2 Wire xDSL Loop - Density Cell 3	$ 46.53	$ 47.22	$ 47.69
2 Wire xDSL Loop - Density Cell 4	$ 113.00	$ 82.73	$ 103.03
2 Wire xDSL Loop - Density Cell 5	$ 292.98	$ 142.21	$ 238.21
2 Wire xDSL Loop - Statewide Average	$ 19.34	$ 17.21	$ 18.85

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS

		Adjust. Factor	**1.03149**
	Weighting	**VZ**	**0.60**
		HM 5.3	**0.40**

UNBUNDLED NETWORK ELEMENT/SERVICE	VZ Rates	HM Rates	Weighted Rate
4 Wire HDSL Loop - Density Cell 1	$ 41.54		$ 42.85
4 Wire HDSL Loop - Density Cell 2	$ 62.87		$ 64.85
4 Wire HDSL Loop - Density Cell 3	$ 107.29		$ 110.67
4 Wire HDSL Loop - Density Cell 4	$ 242.98		$ 250.63
4 Wire HDSL Loop - Density Cell 5	$ 614.98		$ 634.35
4 Wire HDSL Loop - Statewide Average	$ 51.91		$ 53.54
ISDN Loop Extender (Digital) - Statewide Average	$ 14.49		$ 14.95
SUB-LOOPS			
Subloop Distribution - 2 Wire - Density Cell 1	$ 7.96		$ 8.21
Subloop Distribution - 2 Wire - Density Cell 2	$ 13.28		$ 13.70
Subloop Distribution - 2 Wire - Density Cell 3	$ 20.75		$ 21.40
Subloop Distribution - 2 Wire - Density Cell 4	$ 39.94		$ 41.20
Subloop Distribution - 2 Wire - Density Cell 5	$ 60.85		$ 62.77
Subloop Distribution - 2 Wire - Statewide Average	$ 10.08		$ 10.40
Subloop Distribution - 4 Wire - Density Cell 1	$ 15.89		$ 16.39
Subloop Distribution - 4 Wire - Density Cell 2	$ 26.54		$ 27.38
Subloop Distribution - 4 Wire - Density Cell 3	$ 41.47		$ 42.78
Subloop Distribution - 4 Wire - Density Cell 4	$ 79.85		$ 82.36
Subloop Distribution - 4 Wire - Density Cell 5	$ 121.68		$ 125.51
Subloop Distribution - 4 Wire - Statewide Average	$ 20.13		$ 20.76
Drop Sub-Element - 2 Wire - Density Cell 1	$ 1.34		$ 1.38
Drop Sub-Element - 2 Wire - Density Cell 2	$ 2.49		$ 2.57
Drop Sub-Element - 2 Wire - Density Cell 3	$ 3.34		$ 3.45
Drop Sub-Element - 2 Wire - Density Cell 4	$ 4.39		$ 4.53
Drop Sub-Element - 2 Wire - Density Cell 5	$ 6.40		$ 6.60
Drop Sub-Element - 2 Wire - Statewide Average	$ 1.70		$ 1.75
Drop Sub-Element - 4 Wire - Density Cell 1	$ 2.69		$ 2.77
Drop Sub-Element - 4 Wire - Density Cell 2	$ 4.98		$ 5.14
Drop Sub-Element - 4 Wire - Density Cell 3	$ 6.68		$ 6.89
Drop Sub-Element - 4 Wire - Density Cell 4	$ 8.77		$ 9.05
Drop Sub-Element - 4 Wire - Density Cell 5	$ 12.81		$ 13.21
Drop Sub-Element - 4 Wire - Statewide Average	$ 3.41		$ 3.52
NID / HOUSE & RISER			
NID to NID Connnection - 2 Wire (per NID)	$ 0.78		$ 0.81
NID to NID Connection - 4 Wire (per NID)	$ 1.56		$ 1.61
Standalone NID - DS1 (per NID)	$ 0.86		$ 0.88
House and Riser Cable - Building Access (Per Pair, Per Month)	$ 0.45		$ 0.47
House and Riser Cable - Floor Access (Per Pair, Per Month)	$ 0.45		$ 0.47

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS

		Adjust. Factor	**1.03149**
	Weighting	**VZ**	**0.60**
		HM 5.3	**0.40**

UNBUNDLED NETWORK ELEMENT/SERVICE	VZ Rates	HM Rates	Weighted Rate
EEL IOF/TESTING			
2 Wire Analog Test Charge	$ 0.03		$ 0.03
2 Wire Digital Test Charge	$ 0.03		$ 0.03
4 Wire Analog Test Charge	$ 0.06		$ 0.07
DS1 (1.544 mbps) Test Charge	$ 0.07		$ 0.08
Digital 4 Wire (56 or 64 kbps) Test Charge	$ 0.06		$ 0.07
Voice Grade - Fixed includes one end only	$ 15.38		$ 15.86
Voice Grade - Per Mile	$ 0.13		$ 0.13
2 Wire ISDN - Fixed includes one end only	$ 14.70		$ 15.16
2 Wire ISDN - Per Mile	$ 0.38		$ 0.39
LINE PORTS			
POTS / PBX / CTX Port - Per Month		$ 1.42	$ 1.42
FEATURES			
Call Waiting Display Name & Number			NA
Three Way Calling			NA
Remote Call Forwarding			NA
Caller ID - Number Only (Calling Number Delivery)			NA
Caller ID (Calling Number & Name Delivery)			NA
Anonymous Call Block (Anonymous Call Rejection)			NA
*69 (Automatic Recall)			NA
Call Waiting			NA
Busy Redial (Automatic Callback)			NA
Station to Station Calling (CTX Intercom)			NA
CTX Announcement			NA
Ctx Three Way Calling			NA
Ctx Automatic Recall (Return Call)			NA
Ctx Distinctive Ringing			NA
Ctx Loudspeaker Paging			NA
Ctx Meet-Me Conference			NA
Ctx Selective Call Acceptance			NA
Ctx Select Call Forwarding (Ctx Selective Call Forwarding)			NA
Ctx Selective Blocking (Ctx Selective Call Rejection)			NA
Ctx Six Way Conference			NA
Ctx Station Message Detail Record (SMDR)			NA
Automatic Callback (Ctx Repeat Call)			NA
Ctx Call Transfer (Call Transfer - All Calls)			NA
Ctx Call Waiting Terminating			NA
Ctx Call Pick-Up Direct (Directed Call Pick-Up with Barge-In)			NA
Ctx Executive Busy Override			NA
ISDN Intercom			NA
ISDN Announcement			NA
ISDN 3-Way Calling			NA
ISDN 6-Way Conference			NA
ISDN Selective Call Rejection			NA
ISDN Call Transfer Individual - All Calls (Ftr. 578)			NA
ISDN Calling Name & Number Delivery			NA
ISDN Call Pick Up			NA

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS

		Adjust. Factor	**1.03149**
	Weighting	**VZ**	**0.60**
		HM 5.3	**0.40**

UNBUNDLED NETWORK ELEMENT/SERVICE	**VZ Rates**	**HM Rates**	**Weighted Rate**
LOCAL END OFFICE SWITCHING			
Originating EO Local Switching - Per MOU		$ 0.00147	$ 0.001468
Terminating EO Local Switching - Per MOU		$ 0.00147	$ 0.001468
TANDEM SWITCHING			
Tandem Switching - Per MOU		$ 0.00163	$ 0.001630
COMMON TRANSPORT			
Common Transport - Per Mile	$ 0.0000038	$ 0.00038	$ 0.000154
Common Transport - Per Termination	$ 0.0000403	$ 0.00059	$ 0.000261
RECIPROCAL COMPENSATION			
Reciprocal Compensation - Meet Point A - Termination at End Office (Per MOU)		$ 0.00086	$ 0.000858
Reciprocal Compensation - Meet Point B - Termination at Tandem (Per MOU)		$ 0.00283	$ 0.002832
IOF/HICAP			
Interoffice Facilities (IOF) - DS0 Voice Grade - Per Mile	$ 0.13		$ 0.13
Interoffice Facilities (IOF) - DS0 Voice Grade Fixed includes one end	$ 15.38		$ 15.86
Interoffice Facilities - (IOF) - DS-1 Per Mile	$ 3.03		$ 3.13
Interoffice Facility (IOF) DS-1 Fixed includes one end	$ 19.10		$ 19.70
Interoffice Facilities (IOF) - DS-3 Per Mile	$ 16.29		$ 16.80
Interoffice Facilities (IOF) - DS-3 Voice Grade Fixed includes one end	$ 114.73		$ 118.34
Interoffice Facilities (IOF) - DS1 to Voice Grade Multiplexing	$ 306.25		$ 315.89
Interoffice Facilities (IOF) - DS3 to DS1 Multiplexing	$ 631.26		$ 651.14
E911			
E911 Database - ALI Gateway, Per Month	$ 22.39		$ 23.10
DARK FIBER			
Dark Fiber - IOF - Verizon CO to Verizon CO - Serving Wire Ctr Chrg/Pair/SWC	$ 6.83		$ 7.05
Dark Fiber - IOF - Verizon CO to Verizon CO - Interoffice Mileage Per Pair Per Mile	$ 116.39		$ 120.06
Dark Fiber - IOF – Verizon CO to Verizon CO - Intermediate Office Chrg/Intermediate Office	$ 13.66		$ 14.09

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS

		Adjust. Factor	**1.03149**
	Weighting	**VZ**	**0.60**
		HM 5.3	**0.40**

UNBUNDLED NETWORK ELEMENT/SERVICE	**VZ Rates**	**HM Rates**	**Weighted Rate**
DAILY USAGE FILE (DUF)			
Daily Usage File (DUF) - Per Record Recorded	$0.0007118		$ 0.000734
Daily Usage File (DUF) - Per Record Transmitted	$0.0006880		$ 0.000710
SMS (AIN SERVICE CREATION)			
SMS Pricing (AIN) – Service Creation Usage - Remote Access per 24 Hour Day	$ 3,033.75		$ 3,129.28
SMS Pricing (AIN) - Service Creation Usage - On Premises per 24 Hour Day	$ 3,033.75		$ 3,129.28
SMS Pricing (AIN) - Certication and Testing per hour	$ 115.94		$ 119.59
SMS Pricing (AIN) - Help Desk Support per hour	$ 115.94		$ 119.59
Subscription Charge per line/month/service	$ 0.88		$ 0.91
SMS Pricing (AIN) - Database Query - Network Query	$ 0.00047		$ 0.000485
SMS Pricing (AIN) - Utilization Element Per ACU/Query	$ 0.00036		$ 0.000371
SMS Pricing (AIN) - Service Modification - DTMF Update Per Occurrence	$ 0.08		$ 0.083932
Switched Based Announcement	$ 0.00111		$ 0.001145
SMS Pricing - (AIN) Service Creation Access Port Per Month Per Logon ID	$ 1,244.39		$ 1,283.58

Note: Where there are no corresponding HM 5.3 rates, the weighted rate is based solely on the VzCost rate, as modified by the line loss adjustment factor.

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS
ORDER CITES FOR UNE ISSUES

	Supplemental Order #24 (VZ)	Supplemental Order # 24 (HM 5.3)	Supplemental Order # 27 (PFR/PFC)	Supplemental Order # 28
A The changes listed in Section A are applicable to all Verizon UNEs				
1 Cost of Capital	13.98% to 9.98%	7.45% to 9.98%		
Capital Structure	Approved VZ Capital Structure of 25% Debt and 75% equity. (Para. 40, Footnote 55 and Para. 554)	Changed AT&T Capital Structure of 30% debt and 70% equity to 25% Debt and 75% equity. (Para. 40, Footnote 55 and Para. 554)	Not Addressed	Not Addressed
Cost of Debt	Approved VZ's Cost of Debt of 6.26% and rejected AT&T's 4.98% Cost of Debt. (Para 49, 50, 51, 554)	Approved VZ's Cost of Debt of 6.26% and rejected AT&T's 4.98% Cost of Debt. (Para 49, 50, 51, 554)	Not Addressed	Not Addressed
Cost of Equity	Disallowed VZ Cost of Equity of 13.95% and approved 11.22% (Para 78)	Disallowed AT&T's Cost of Equity of 8.51% and approved 11.22% (Para 78)	Affirmed Commission's Cost of Equity. (Para 40)	Not Addressed
Risk Premium	Rejected VZ's proposed Risk Premium of 3.95%. (Para. 83, 555)	HM 5.3 did not include risk premium.	Affirmed Commission's decision to reject the VZ Risk Premium. (Para 43)	Not Addressed
2 Depreciation	Current Prescribed Lives		Current Prescribed Lives	New Prescribed Lives
Lives	Denied VZ use of GAAP Lives in favor of existing prescribed Lives but allowed VZ to petition for the inclusion of new prescribed lives from Docket # UT-040572 when decided. (Para. 97, 556)	No Change	Upheld latest prescribed lives but allowed VZ to petition for the inclusion of new prescribed lives from Docket # UT-040572 when decided. (Para. 47).	Grants Verizon's petition to use newly prescribed lives decided in Docket # UT-040572. (Para 34) Assumes both VzCost and HM 5.3 rerun with new lives
3 Forward Looking Calibration Factor				
FLC	Change FLC factor from .85 to .90. but allowed VZ to petition for the inclusion of new prescribed lives from Docket Number UT-040572 when decided. (Para. 120 and Footnote 108)	No Change	Affirmed the .90 FLC Factor applied to VZ book investment and denied VZ proposal of the use of the .90 factor to the HM 5.3's investment. (Para. 58)	Not Addressed
4 Productivity and Inflation				
Productivity	Denied VZ productivity and approved the average productivity of 5.5% per year for the period 1996 - 2001 as proposed by AT&T. (Para. 128, 558)	No Change	Not Addressed	Not Addressed
Inflation	Denied VZ use of CPI index and approved the use of the GNP-PI index applied to non-labor accounts as proposed by AT&T. (Para. 126, 558)	No Change	Not Addressed	Not Addressed
5 Retail-Avoided Expense				
Advertising	Found that the proper level of wholesale advertising is 15% of retail advertising. Therefore the retail avoided percentage would be 85%. (Para. 135, 559)	Not addressed (VZ unclear of HM 5.3's application of marketing)	Not Addressed	Not Addressed
6 Engineer, Furnish and Install				
EF&I (DLC)	Affirmed VZ's 46% EF&I for DLC (Para. 413)	Rejected AT&T's reliance on SME opinions in determining EF&I costs.	Not Addressed	Not Addressed
7 Model Weighting	Where UNEs are derived in both models, weight rates: VZ @ 60% and HM 5.3 @ 40% (Para. 273, 562)	Where UNEs are derived in both models, weight rates: VZ @ 60% and HM 5.3 @ 40% (Para. 273, 562)	Not Addressed	Affirmed 24th Supplemental Order (Para. 15)

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS
ORDER CITES FOR UNE ISSUES

		Supplemental Order #24 (VZ)	Supplemental Order # 24 (HM 5.3)	Supplemental Order # 27 (PFR/PFC)	Supplemental Order # 28
B	**The changes listed in Section B are applicable to Verizon Loop and Loop-Related (e.g.,Subloop, NIDs, etc.) UNEs**				
1	**Plant Mix**	Reject VZ's plant mix assumptions and change the restriction regarding the placement of underground facilities. (Para. 285)	Reject AT&T's plant mix modeling and adopt Staff's plant mix assumptions for use in HM 5.3 (Para. 286)	Affirmed Staff's plant mix assumptions (Para. 77 & 79)	Not Addressed
2	**Demand Reduction**	In lieu of demand reduction, 3.1% Loop Cost increase due to full competition (Para. 312)	5% Line reduction due to full competion (Para. 312)	Affirm the Commission's surrogate 5% line reduction adjustment to Verizon's loop rate and reject Verizon's proposal to perform the adjustment in its compliance filing (Para. 105)	Commission views request for clarification as an additional request for reconsideration. Affirms method of applying the 5% line reudction to the VZ Model. (Para 24-26)
3	**Structure Sharing**	Could not implement sharing inputs from 8th Suppl Order since VZ model does not allow variations among the density zones (Para. 308)	Sharing inputs from 8th Supplemental Order (Para. 308)	Affirm the 24th Supplemental Order's findings on structure sharing (Para. 87)	Not Addressed
4	**Loop/IOF Sharing**	Accept VZ's 50% loop/IOF structure sharing assumption (Para. 310-311)	Reject AT&T's 75% Loop/IOF structure sharing and accept VZ's 50% assumption as input into HM 5.3 (Para. 310-311)	Affirm the 24th Supplemental Order's findings on structure sharing (Para. 87)	Not Addressed
5	**Placement Costs**	In Lieu of USF Inputs Order, must reduce placement costs by 5% (Para. 321)	USF Inputs Order (Para. 321)	Affirm the 24th Supplemental Order's placement cost findings (Para. 95).	Not Addressed
6	**Hand Digging/Boring**	1/2 % of distribution distance should be considered placed in another party's trench at no cost (Para. 329)	No Change	Not Addressed	Not Addressed
7	**Material Costs**	Could not implement sharing material costs form USF Inputs Order since VZ model does not allow variations among the density zones (Para. 308)	Use USF Inputs Order adjusted for Turner Price Index (Para. 341)	Affirm 24th Supplemental Order material cost (Para. 101)	Not Addressed
8	**Loop Length**	Adopt a 12 kft copper/fiber breakpoint as input for VZ and HM 5.3 (Para. 255 & 442)	Adopt a 12 kft copper/fiber breakpoint as input for VZ and HM 5.3 (Para. 255 & 442)	Affirm 24th Supplemental Order and adopts Staff's proposalt (Para. 32)	Not Addressed
9	**Distribution Fill**	Reduce distribution pairs per location to 2 for sizing factor (Para. 377)	Increase distribution pairs per location to 2 for sizing factor (Para. 377)	Not Addressed	Not Addressed
10	**UDLC vs. IDLC**	No Change	HM modeling of 100% IDLC rejected (Para. 404)	Not Addressed	Not Addressed
11	**Cable Sizes**	Adjusted via regression analysis to include larger sizes (Para. 416 and Footnote 322)	By density zone, Block/ Bldg Fraction of total distance set at 0 for < 2,400 pair (Para. 419)	If VZ contests 2700 pair cable size, sensitivity runs should be filed (Para. 70, 146 & 148)	Commission does not find just cause to reconsider adjustment to maximum copper cable sizes (Para. 32-33)
12	**Length of Drop Wire**	8th Suppl. Order should be employed (50 to 175 ft) (Para. 436)	8th Suppl. Order should be employed (50 to 175 ft) (Para. 436)	Not Addressed	Not Addressed
13	**Buried Drop sharing**	Staff Inputs (Para. 439, Table 8)	Staff Inputs (Para. 439, Table 8)	Not Addressed	Not Addressed
14	**Private Line Loops**	Non-Switched Private Line loops adjusted to assume 4 lines per location (Para. 163)	No Change	Not Addressed	Not Addressed
15	**Deaveraging**	Use WA Staff's Proposal (Para. 500, 564)	Use WA Staff's Proposal (Para. 500, 564)	Not Addressed	Not Addressed
C	**The changes listed in Section C are applicable to Verizon DS0, DS1, DS3 and Dark Fiber IOF UNEs and the DS3 loop.**				
1	**DS3 Loop**	Incorporate inputs with respect to loops (Para. 491)	Not Addressed	Not Addressed	Not Addressed
2	**Circuit Utilization/Fiber Fill**	Adjust VZ fiber utilization fill to 40% (Para. 386, Footnote 301 and Para. 391)	Not Addressed	Not Addressed	Not Addressed
3	**Dark Fiber IOF**	Para. 486, Para. 386 - Footnote 301 and Para. 391	Not Addressed	Not Addressed	Not Addressed

VERIZON NORTHWEST INC. - WASHINGTON
DOCKET NO. UT-023003
IN COMPLIANCE WITH 28TH and 29TH SUPPLEMENTAL ORDERS
ORDER CITES FOR UNE ISSUES

	Supplemental Order #24 (VZ)	Supplemental Order # 24 (HM 5.3)	Supplemental Order # 27 (PFR/PFC)	Supplemental Order # 28
D The changes listed in Section C are applicable to Switching				
1 Switch Prices		Use AT&T's switch investments updated with Turner Price Indices. End Office Amalgamated Switching Investment per Line Term set at $80.04 (Para. 462-463, Appendix A).	Affirmed 24th Supplemental Order (Para. 114, 117).	Not Addressed
2 Analog Line Offset		Rejects AT&T's use of a $30 per line "analog line offset" used in the HM switching module (Para. 191).	Not Addressed	Not Addressed
3 Switching Rate Structure		Rejects AT&T's flat switching rate proposal (Para. 192). Approves Verizon's flat-rate plus usage sensitive rate proposal (Para. 518).	Not Addressed	Not Addressed
4 Switching Rate Deaveraging		Decline to deaverage switching rates (Para. 521).	Not Addressed	Not Addressed
5 Vertical Switch Features	Rejected Verizon's vertical feature costs (Para. 469).		Affirmed 24th Supplemental Order (Para. 109).	Not Addressed
6 Umbilicals/SS7	Agrees with Verizon that umbilicals are not-transport-related costs and along with SS7 should be included in the usage-sensitive switching rates. VZ to submit the calculations implementing this change as part of its compliance filing.(Para. 472-473)		The SS7 and umbilical costs should be included in the UNE local switching mou rate. Verizon must provide the ratio of umbilical and SS7 costs to its per-MOU switching rate from Verizon's original filing, so that the switching per-MOU rate can be inflated by that factor (Para. 151, 156).	Verizon correctly described the methodology for inflating the HM 5.3 switching rate to account for umbilical and SS7 costs. Verizon should use the switching data in Appendix A and the methodology described above to calculate the switching rates portion of their compliance filing (Para. 20).
7 Switching Fill		Set the Switching Line Port Fill factor at 92% rather than 94% switch port administrative fill factor filed by AT&T in the HM 5.3 model (Para. 385).	Affirm decision to use 92% factor (Para. 121).	Not Addressed
8 Minutes of Use		AT&T acknowledged that DEMS data should be based on year 2000 from ARMIS (Para. 476-477, Footnote 374).	Not Addressed	Not Addressed
9 Reciprocal Compensation		Rejects XO's proposal to align the per MOU reciprocal compensation rates for local and tandem switching with the UNE switching rate. Agrees with Verizon that the Act makes a distinction between switching and termination rates (Para. 528 and Footnote 402).	Affirms Order adopting a reciprocal compensation rate different from the traffic-sensitive portion of the local switching rate. Found that Verizon's exclusion of the "getting started" costs better reflects the actual traffic sensitive portion of the local switching rate (Para. 138-141).	Not Addressed
10 Application of 5% Loop Demand Reduction		Not Addressed.	The 5% loop demand reduction should also apply to switching costs (Paragraph 158).To match the 5% line count reduction ordered by the Commission in paragraph 160 of this Order, the number of switched lines in the 'Unit Costs' tab of HM 5.3's Density Zone output file was reduced by 5% (Appendix B).	Not Addressed