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William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in WCB/Pricing No. 02-06
Public Notice DA 02-696 released March 25, 2002

Dear Mr. Caton:

Pursuant to the Public Notice referenced-above, and Section 1.415 and 1.419 of the Commission's rules, 47 C.F.R. §§ 1.415, 1.419, Telcordia electronically submits the following Comments on the issues raised in this proceeding.

Comments

Telcordia's Role – At the request of all of the Price Cap ILECs, Telcordia has reviewed the proposed Tariff Review Plans and developed a list of proposed modifications. These changes have been reviewed and accepted by the Price Cap ILECs, and Telcordia has been requested to file comments in this proceeding on behalf of all of them.¹

Format for Tariff Review Plans – The FCC has issued both the long-form and short-form TRPs in both Lotus (wk4) and Excel (xls) format. Telcordia recommends that only files in Lotus format be released, since the macros included in the current versions of the files do not work in Excel, and would need to be modified.

Suggested Corrections/Edits – Telcordia, at the request of the Price Cap ILECs, has reviewed the Commission's proposed TRPs, and agrees that they, for the most part, will

¹ The Price Cap ILECs are Aliant Communications Company, Ameritech Operating Companies, BellSouth Telecommunications, Inc., Cincinnati Bell Telephone, Citizens Telecommunications Companies, Frontier Communications of Minnesota and Iowa, Frontier Communications of Rochester, Iowa Telecommunications Services, Inc., Nevada Bell Telephone Company, Pacific Bell Telephone Company, Qwest Corporation, Southern New England Telephone, Southwestern Bell Telephone, Sprint Local Telephone Companies, Valor Telecommunications Enterprises, LLC, and Verizon Telephone Companies.

accurately calculate the indices, rates, and revenues required by the Commission's Price Cap Rules. There are a limited number of cells, however, that should be modified to reflect corrected formatting or to allow more accurate calculation of certain indices, rates, or revenues. Telcordia has therefore, at the request of the Price Cap ILECs, developed revised TRPs that incorporate those proposed changes, all of which are detailed in Attachment A. These proposed TRPs are being submitted with these comments.

There are two versions of the proposed Short-Form TRP being submitted:

1. a zero-filled file **2TRPAS02**, which contains neither test data nor cell highlighting
2. a data-filled file **2TRPAS6D**, which contains highlighting in the cells that have changed).

There are also two versions of the proposed Long-Form TRP being submitted:

1. a zero-filled file **2TRPAN02**, which contains neither test data nor cell highlighting
2. a data-filled file **2TRPAN6D**, which contains highlighting in the cells that have changed).

Once the changes detailed in Attachment A are incorporated into the TRPs, we conclude that they will accurately calculate and display the indices, rates, and revenues required by the Commission's Price Cap Rules and Regulations, and should therefore be adopted

Sincerely,

(signed) P C Hurewitz

P.C. Hurewitz

**Detailed List of Proposed Changes to the Tariff Review Plans included in
WCB/Pricing No. 02-06, Public Notice DA 02-696 released March 25, 2002**

Short-Form TRP Proposed Changes and Replacement Files:

File 1: replacement of the short-form TRP: **2TRPAS02**. This file contains neither test data nor cell highlighting.

File 2: Data-filled version of the short-form TRP: **2TRPAS6D**, with highlighting in the cells that have changed.

Both of these files contain the following changes:

1. YZE_TGT2 - U1079, U1081, V1081, and W1081 now have formulas that will bring in the words "June filing" where appropriate, instead of zeros.
2. YZE_TGT2 - V1082 and W1082 are now hard-coded with "N/A". This now matches both the long-form and prior years' short-form TRPs. Note that the TGT2 form had already displayed "N/A" in the corresponding cells (V96 and W96).

Long-form TRP Proposed Changes and Replacement Files:

File 3: replacement of the long-form TRP: **2TRPAN02**. This file contains neither test data nor cell highlighting. It is attached in ZIP format, because of the size of the file.

File 4: Data-filled version of the long-form TRP: **2TRPAN6D**, with highlighting in the cells that have changed. It is attached in ZIP format, because of the size of the file.

Both of these files contain the following changes:

A. On the first sheet of the TRP:

1. TGT2 and YZE_TGT2: Some of the cells contained "comma 0" formatting instead of "fixed 4" formatting. The particular cells were U91 to W92, U93, U1077 to W1078, U1079, and T1090.
2. YZE_RTE1p1: The formulas in 9 cells (BG1020 to BI1020, BG1046 to BI1046, and BG1055 to BI1055) did not contain the appropriate incorrect cell references for those cases where there was no Jurisdictional pricing. The proposed change will result in calculations for non-jurisdictional COSAs that will now match what they have always been.
3. CAP1p1: The cells CZ131 through DD131 should not contain any entries.
4. YZE_CAP4: The formulas in cells CY1270 to CY1272 do not display the appropriate results in all situations. These should be modified as follows:
 - a. The formula in cell CY1270 should be revised to read:
@IF(CY1114<>"Yes","No Pooling",@IF(\$G\$6="y",
@IF(@SUM(CY1118..CY1120)=0#AND#CY1255="CAP3",CY1255,CY1035),
@IF(CY1255="CAP3",CY1255,CY1035)))
This will allow the model to bring in the appropriate MultiLine PICC cap, whether the COSA involved is multi-jurisdictional or a single jurisdiction.

- b. The formula in cell CY1271 should be revised to read:
`@IF(CY1114<>"Yes","No Pooling",@IF(G6="y",
@IF(@SUM(CY1118..CY1120)=0#AND#CY1255="CAP3",CY1255,CY1092),
@IF(CY1255="CAP3",CY1255,CY1092)))`
This will allow the model to bring in the appropriate Maximum Average MultiLine PICC Rate, whether the COSA involved is multi-jurisdictional or a single jurisdiction.
- c. The formula in cell CY1272 should be revised to read:
`@IF(CY1114<>"Yes","No Pooling",@IF(G6="y"#AND#G7="y",
@if(@SUM(CY1118.CY1120)=0#AND#CY1255="CAP3",CY1255,CAPs:E11272),
@if(cy1255="cap3",CY1255,(CY1270-CY1271)*(CY1018+CY1019/9+CY1020))))`
This will allow the model to correctly calculate the MultiLine PICC Revenue below the cap.

5. CAP4:

- a. The description in cell CX284 should be modified to show “CAP1r430”, to match the new formula in cell CY1270
- b. The description in cell CX285 should be modified to show “CAP1r830”, to match the new formula in cell CY1271.
- c. The value in cell CY294 should be hard-coded as “N/A”, to match both prior year TRPs and the current year’s display in YZE_CAP4, cell CY1284.

6. ANALYZERp2: Cells DI86 to DI88 need an additional test in the initial "@if" statement (#AND#CY1116<>"CAP1"). This will allow them to appropriately handle COSAs that have jurisdictional pricing but do not use the CAP1 form.

B. On the CAPs sheet of the TRP:

1. The text in cell D14 should be removed, as it does not match the process used to populate data in cells in row 15 of that spreadsheet.
2. Cell D15 should contain a formula to bring in the jurisdiction name from the RTEs sheet. That formula should read `@IF(RTEs:D15="", "", RTEs:D15)`. Similar changes should also be made to M15, V15, AE15, AN15, AW15, BF15, BO15, BX15, CG15, CP15, CY15, DH15, DQ15, and DZ15.
3. CAP4J: The value in cell D294 should be hard-coded as “N/A”, to match the display in the rollout (or first) sheet of the TRPs and the display in YZE_CAP4J, cell D1284.