- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of the Determination of the Cost of the Unbundled Loop of QWEST CORPORATION	)))	DOCKET NO. 01-049-85 REPORT AND ORDER

ISSUED: May 5, 2003

SYNOPSIS

The Commission adopts AT&T's HAI model as modified by the Division of Public Utilities with further adjustments as noted in this Order. The Commission sets the monthly weighted average unbundled loop rate at $12.95, and the monthly unbundled flat-rate switching rate at $3.80.

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APPEARANCES

For Qwest:	Ted D. Smith Gregory Monson Attorney at Law Stoel Rives LLP 201 South Main Street, Suite 1100 Salt Lake City, UT 84111
For the Division of Public Utilities:	Michael Ginsberg Assistant Attorney General 500 Heber Wells Building 160 East 300 South Salt Lake City, UT 84114
For XO & AT&T:	Gregory J. Kopta Attorney at law Davis Wright Tremaine LLP 2600 Century Square 1501 Fourth Avenue Seattle, WA 98101-1688
For Eschelon Telecom Inc. And Integra Telecom of Utah	J. Jeffrey Oxley Vice President and General Counsel 730 2nd Avenue South Suite 1200 Minneapolis, MN 55402
For WorldCom:	Thomas F. Dixon Attorney at Law 707 17th Street, #4200 Denver, CO 80202

By The Commission:

PROCEDURAL HISTORY

This matter came before the Commission for hearing on December 16, 17 and 18, 2002, and January 9 and 10, 2003. Parties filed post-hearing briefs on February 24, 2003, and reply briefs on March 21 through 24, 2003. Qwest filed a Motion for Permission to File Limited Response to Reply of the Division, and its Limited Response to Reply Brief of the Division on April 1, 2003.

INTRODUCTION AND MODEL DEFINITION

Most disagreements in this docket focus on the construction and design practices the parties argue are compatible with

the Total Element Long-Run Incremental Cost (TELRIC) methodology. While all agree that prices must be based on the TELRIC modeling approach, they do not agree on what that methodology is, or on the prices the methodology should produce. The Commission will define what TELRIC means for companies doing business in Utah. The decisions that follow are based on the logic and standards set out in this definition.

The definition of the TELRIC methodology must begin with a determination of the objectives, followed by a description of specific operational standards. We view the TELRIC methodology as providing a proxy cost estimate for elements of a forward-looking monopoly provider's theoretical least-cost, most-efficient, forward-looking network designed to provide for current demand. The model is not a representation, nor a blueprint, of an actual network. Rather, it is an estimate of what minimum costs any single efficient forward-looking provider would incur to serve current demand. A TELRIC model is not a substitute for an engineer. It is an estimated cost-proxy model. The question is whether the cost estimate is sufficient to compensate a least-cost, most-efficient, forward-looking provider of network elements.

The theory behind such a definition is a blend of economic models and theories. One is that in competitive markets prices are not just driven to cost, but to the minimum long-run average cost. The other is that because of economies of scale the telecommunications network is a declining cost industry. As a result, for most of the relevant levels of output, lower per unit costs are associated with increasing levels of output. As an example, there are certain fixed costs associated with providing telecommunications service. As the number of lines served increases, the fixed costs get spread over a larger base, resulting in lower average fixed costs as output increases. Therefore, TELRIC asks what is the lowest cost estimate for a declining cost provider to self-provision a given element, assuming optimal size and design. That amount will be the minimum forward-looking, least-cost, most-efficient long-run average cost. Then the TELRIC methodology requires that the Commission set the price for the element at that level in recognition that if competitive markets were present, prices in the marketplace would be driven to this amount. In a sense, the law asks the Commission to make a firm with significant market presence price network elements as if it were an efficient competitor. Historical costs, practices, and policies have little to do with setting TELRIC prices.

We now turn to defining the actual manner in which this standard is applied in modeling practice. The solution is a point on a continuum between extremes. On the one hand, a TELRIC model could assume that the world is a blank slate (with the exception of the central office buildings' locations, easements, rights-of-way, and customers' locations) and that the model must estimate the costs of building a network in one grand building project. After the network is in place, customers instantly populate the new TELRIC-compliant world. Such an approach would provide tremendous cost savings due to volume discounts, scale efficiencies, and ease of placement. However, such a process has little relevance because such discounts and efficiencies were never, and will never be, available. The scenario does not fit the assumptions. No provider, no matter how efficient or forward-looking, could have ever obtained the postulated benefits.

At the other extreme, one could postulate that everything but the telecommunications network is already built and that the theoretical TELRIC company must then build a network without any significant disruption from the construction activities. Such an approach would impose tremendous inefficiencies and artificial costs on the builders. For instance there would never be any "new" construction projects, only existing structures to serve. However, even this option would likely generate huge discounts and scale economies due to its scope. Like the first extreme we find this one has little relevance to the issue here either, because the theoretically efficient provider would never face such a situation.

We adopt the following application of the TELRIC methodology, which accomplishes the objectives stated earlier, by estimating a cost for network elements based on the assumption that the company could accurately predict the required network architecture in the following three ways:

1. It could predict the final demand precisely (including the way in which advanced services would change the utilization of the network).
2. It could predict customers' locations.
3. It could predict the design and building practices which are the least-cost, most-efficient, and forward-looking, based on today's best standards and technology.

Does this definition reflect actual practice? No. Does it reflect the objectives of the TELRIC methodology? Yes. To summarize, the objective is to model the cost of the least-cost, most-efficient, forward-looking network required to serve

the current customers as if it had been built correctly the first time around. However, given that the knowledge and technologies to build the correct network did not exist the first time around, we must assume the foresight detailed above. What this means in practical terms is that we cannot impose huge discounts on every activity involved simply because a modeler claims the hypothetical building project would be the biggest single construction project in the history of the State. Likewise neither can we impose huge placement costs simply because we assume that the world can exist as it does now except for not having a telecommunications network.

The operational TELRIC standard requires that a TELRIC model estimate a cost for elements that would occur if a TELRIC-compliant network (based on today's standards) had been built over time, as the population the TELRIC network would have served developed, instead of an actual network that was built.

CHOOSING A TELRIC MODEL

We find that Qwest's integrated cost model (ICM) does not comply with the TELRIC standard as defined in this Order. Specifically, it does not utilize optimization algorithms in the design of a network; rather it calculates a weighted average price for network elements based on a set of prices developed from Qwest's standard practices as defined for certain central office types. AT&T's HAI modeling framework is mostly a TELRIC-compliant approach to modeling estimated TELRIC costs. The HAI model optimizes most design steps. Where the model does not utilize proper optimization the Commission makes adjustments to compensate, as detailed in this Order. We find that in the main the Division's efforts to adjust the inputs of the HAI model are closely aimed at identifying the best practices available that would result in a least-cost, most-efficient, forward-looking network cost estimate. Therefore, we accept the Division's recommendation that we use the HAI model framework. We also accept the majority of the work, adjustments, and inputs the Division recommends for the HAI model. The exceptions are the changes detailed in the remainder of this Order.

ADJUSTMENTS TO THE DIVISION'S VERSION OF THE HAI MODEL

A. Minimum Spanning Tree methodology versus Backbone and Branch

The TELRIC model must, in part, estimate the costs of the distribution network. The parties have proposed various approaches to modeling this cost, ranging from using the rectilinear minimum spanning tree (RLMST) calculation to designing a backbone and branch grid to connect customers within a given geographic area. The various iterations of the minimum spanning tree (MST) presented in this docket are a proxy for the required distance of cabling to construct a distribution network within the HAI model. Likewise, using a backbone and branch methodology is a proxy for the actual system as well. The challenge before the Commission is to select the methodology that produces a cost estimate that most closely approximates the cost that a least-cost, most-efficient, forward-looking provider would have incurred if the network had been built correctly. We do not seek to select a method that designs the actual distribution system, but one that provides the most reasonable estimate of the TELRIC cost. A pure MST approach would underestimate the necessary materials because it would calculate distances that would be too short to follow rights-of-way, easements, and roads, or to avoid natural barriers. With the exception of very odd natural, or man-made, barriers, an RLMST calculates the maximum reasonable distance to connect points. Unless one must design a network path that doubles back on itself, the rectilinear path is the longest necessary path. So a basic RLMST is a good default or comparison point for analysis.

The Joint CLECs (AT&T, Eschelon, Integra, and MCI Worldcom) recommend the use of what we will term the modified rectilinear MST (modified RLMST). This methodology requires that all connecting distances be calculated subject to three main constraints: First, that the distance to connect locations is calculated using only vertical and horizontal design components. Second, branches in the structure are only allowed at customer (proxy) locations. Third, that the minimum distance design (subject to constraints one and two) is chosen.

We find that these three constraints, combined with the even spacing of unknown customer locations throughout a given cluster, all increase the estimated cost of the network as compared with a true MST estimate. Additionally the second constraint, and the even spacing of the surrogate locations for unknown customer locations, increases the estimated distance and cost beyond what a regular RLMST calculates. The more densely populated an area, the more likely it is that the first two constraints are warranted, while the more rural an area, the more likely it is that the first two constraints are less warranted. In a rural setting, roads are much less likely to follow strict right-angle routes than along

the Wasatch Front. Also, rural customer locations are more likely to be reached by using "hypotenuse type" rights-of-way across customers' property for long distances that reduce the need for rectilinear adjustments.

Qwest recommends not using any type of MST. Instead Qwest recommends using HAI's backbone and branch methodology (a legacy capability within the model from earlier iterations). Neither Qwest nor any other party presented evidence that the backbone and branch methodology is theoretically superior to any type of MST approach. Instead Qwest noted the final outcome of a backbone and branch calculation is closer to the ICM's estimated number. Since the Commission is adopting the HAI model because its approach to optimization more closely comports with TELRIC than does ICM, the argument that turning off HAI's optimization features more closely matches the ICM is not persuasive.

The Division recommends the use of the modified RLMST with a 10 percent added adjustment for non-rural regions, and that the regular modified RLMST be used in the lowest density zone. The Division recommends the 10 percent additional adjustment to account for natural obstacles and non-geocoded customers. While it is true that oddly shaped natural obstacles could require more distance, we find that the unknown geocoded customers will usually require less distance than the RLMST calculates. The reason for this is that evenly spacing these customers over the entire cluster area, the methodology employed by the HAI, can only result in these customers being either just as expensive to reach or more expensive to reach; it cannot make them less expensive to reach. The Division showed that just moving from MST to a regular RLMST added around 20 percent to the strand distance. Additionally, requiring branching to occur at customer locations further increases strand distances. In an earlier Docket, Qwest testified that moving from an MST to a custom designed network (i.e., a forward-looking, least-cost, most efficient design) for a set of points added about 18 percent to the strand distance. The issue then is how much more of an increase is warranted. The modified rectilinear MST contained in the current version of the HAI model (constrained to branch only at existing customer locations) already adds in excess of 20 percent to the distance calculated by a pure MST. For the reasons cited above, we find the extra 10 percent added adjustment is unnecessary. We direct the parties to use the rectilinear MST approach as modified by AT&T to require branching only at customer locations. We further direct that this methodology be used for all zones. Due to the branching constraint and the even spacing of unknown customers, the modified RLMST overestimates the minimum cabling and serves as a reasonable estimate of what would actually be required.

We note that one other type of MST (a methodology termed a road MST) was discussed in the hearings and testimony. No party directly advocated a road MST in testimony, but comparisons were made to it. Until a party presents evidence concerning the effect of adopting a Road MST methodology in Utah, it is too speculative to use it as an upper or lower limit.

B. Structure Sharing

The Division attempts to determine what a reasonable sharing percentage might be in a TELRIC world. A TELRIC solution can be obtained when it is assumed that the telecommunications company built the network in a TELRIC-consistent manner all along. This results in serving areas and distribution areas that are generally larger than those observed in practice. As a result, the theoretical TELRIC company will not have as many sharing opportunities as the Joint CLECs assume, and probably would not have as many as the Division assumes because on occasion they would find themselves building out further than the other non-TELRIC utilities might be willing to go. But the TELRIC-compliant company likely will have significantly more opportunities than Qwest assumes. We find that the level of sharing suggested by AT&T is unrealistic and that the arguments put forward to support it do not. We are left with a generally optimistic view of the opportunities available put forth by the Division, and a more pessimistic view advocated by Qwest. Based on the record available, we believe it reasonable to use the midpoints for the various sharing inputs between Qwest's percentages and the Division's

C. Plant Mix and Placement Methods

We find that the Joint CLECs and the Division recommend an aerial plant percentage that is too high based on a comparison to current construction requirements. As Qwest points out in testimony, many Utah cities and counties require underground or buried placement of all utility and telecommunications facilities. In fact, Qwest's reported overall plant mix is approximately 14.5 percent aerial, 65.6 percent buried, and 19.9 percent underground. In order to follow the Commission's definition laid out above, the requirement is to model a TELRIC-compliant network to serve

the current demand that was built efficiently as the population developed. Such an approach could allow for increased aerial and underground facilities, but the forward looking nature of the TELRIC model argues for less aerial. However, once the decision is made to place facilities below grade, competitive pressures would push companies toward the lower cost methods of placing cable and facilities below grade.

We find that Qwest's current placement percentages with respect to above or below grade placement provide a reasonable blend of past opportunities and forward looking practices. However, given that the theoretical TELRIC-compliant network is assumed to have been built correctly as the population developed, the placement methods used would incorporate lower cost placement methodologies than those of the Qwest/Division midpoint approach. We direct the Division to utilize the midpoint of the Division's and AT&T's inputs for placement methods. We direct the Division to adopt placement input percentages that are consistent with the following percentages when weighted across density zones: 15 percent aerial, 66 percent buried, and 19 percent underground.

D. Drop length

We find that none of the studies, or anecdotal evidence, offered with respect to this issue meet the standard of statistical validity. However, we also note that when the actual distances are ignored and the dollar impact of the various parties' estimates are examined that the total range from the lowest to the highest estimates is of minor magnitude. According to the post-hearing matrix submitted by the parties, Qwest's estimated drop length yields an approximate increase in monthly loop costs compared to AT&T's of only $0.11. The Division increases AT&T's amount by approximately $0.08. We direct the Division to adjust the drop length inputs to the midpoint of the range defined by the Qwest and AT&T estimates for each density zone. Further, we find that specifying drop lengths by density zone is the best approach to the issue. If a party believes that further refinement to this input is necessary, that party should conduct a statistically valid drop length study and submit it in a future Docket.

E. Corporate Overhead, General Support Services, Wholesale Marketing Costs, and Network Operations

As the Division's and Joint-CLECs' representatives repeatedly point out in their testimony and briefs, all of the expense factor adjustments are interrelated. We recognize that the Division implemented our Order in Docket Number 00-049-106 by "zeroing out" certain categories of expenses to match our ordered rate of 26.7 percent for overall overhead. While we understand why the Division used this approach, it complicates the model and raises questions as to the method employed. The HAI model has an input field that explicitly calculates corporate overhead. We direct that this field and the HAI model's internal algorithms be used to calculate overhead expenses and allocate other expenses. We direct that this field be set to 26.7 percent. The Commission's intent in ordering a rate of 26.7 percent in the previous Docket was not to move expenses to another Docket, as has been suggested in testimony in this Docket, but to cap the overall expense level to one that we found reasonable. Therefore the approach of using the HAI model's framework is reasonable as long as the proper rate is used.

A further adjustment that the Division makes is to change the allocation of the remaining expenses and to add back into the model a 6 percent network operations expense factor. We find that these adjustments are needlessly complicated. We direct that the basic AT&T modeling approach of inputting a specific overhead factor, a forward looking adjustment factor, and using the expense allocation algorithm contained in the model to arrive at a network operations expense be used.[(1)] We clarify that the adjustments that the Division makes by "zeroing out" certain fields and adding back in 6 percent is rejected in favor of letting the HAI model calculate overhead expenses, expense allocation, and network operations expense as it is designed to do.

We will not adjust the general overhead expense factors beyond the level ordered in Docket 00-049-106 (26.7 percent). However, the parties point out that Network Operations Expense was not included in the 00-049-106 Docket. The HAI model provides a calculation for network operations expense independently of the corporate overhead factor. Unfortunately, this calculation is one of the areas of the HAI model that does not live up to the TELRIC-compliant standard. The basics of the HAI model's calculation is simply to start with a given ARMIS-based input level and then have an expert witness select a forward looking adjustment that removes a percentage amount of expense. We find that this is not a TELRIC-compliant approach to calculating a reasonable network operations expense level.

The TELRIC-compliant network operations expense level should be a function of the costs of running the expected network, not a function of current ARMIS numbers, or a fixed percentage of the total cost of the network. We suggest that the parties develop modeling procedures that would base the calculation of network operations expense on the characteristics of the network. Information such as the number and length of loops in the system, the number and type of switches, the number of trunks and their configuration, should be the basis of this calculation. A reasonable proxy for that detailed level of information might be the dollar amount of investment by specific type of investment, with different percentages assigned by type. Such modeling procedures should be presented in a subsequent loop cost docket. For this Docket we direct the Division to set the forward looking adjustment at the midpoint of Qwest's and AT&T's inputs.

F. Switching Costs and Fill Factors

1. Switching Costs

The Commission finds that where possible, costs should be billed to CLECs in the same manner as they were incurred by Qwest. To do otherwise sends distorted price signals that will artificially induce or retard the development of competition for the related services. Certainly the experience the industry has gone through with reciprocal compensation illustrates the futility and danger of devising artificial pricing structures.

Qwest is charged a flat, fixed, per line price for switching once basic capacity and design issues have been accounted for. Given that a TELRIC network is designed to meet current demand, the capacity issues at stake in this issue will have been accounted for in the modeler's inputs and assumptions. As established by the testimony in this case from the Joint CLECs' witness, the most current estimate of average Utah usage demand is 3.37 centi call seconds (CCS). We have testimony in the form of excerpts from two contracts with different switching vendors in this Docket that reflect relatively current pricing as introduced by Qwest's witnesses. In both cases, the CCS design parameters set in those contracts accommodate Utah's average CCS levels; hence the base rates in these contracts are more than sufficient to serve current demand (as TELRIC requires) with no usage sensitive charges. AT&T/MCI points to the FCC's determinations of switching costs and its own evaluation of the current contracts to support its (lower) number. As AT&T's and MCI's witness points out, the Division's and Qwest's switching cost inputs, which are based on these contracts and expert opinion, include additional costs to account for future growth, upgrades, and unreasonable levels of spare capacity. AT&T's and MCI's witnesses argue that if switch costs were inflated to account for future customers and upgrades, then a corresponding inflation in line count would be necessary.

We find that a TELRIC-compliant model serves current demand. Therefore, we agree with AT&T/MCI that current demand and the capacity needed to serve it should drive the switching cost inputs. Neither Qwest nor the Joint CLECs provided the underlying documentation to the Division; in the case of the Joint CLECs they could not because the RBOCs (including Qwest) who provided information to the FCC stipulated that it be kept confidential, and in Qwest's case because they chose not to.

All parties agree that digital switching costs have dropped and continue to drop significantly over time. The issue then is to set a price that reflects current realities. We adopt AT&T's default inputs for the basic switch investment. We clarify that switching will be billed on a flat-rate basis, with no usage charges. We direct the Division to adjust its version of the HAI model to the AT&T default switching investment input of $89.00, and to use the flat rate monthly price for switching developed by the HAI model as adjusted in this Order.

2. Switching Fill Factors

The Commission finds that Qwest's inputs for fill levels are understated. As testimony from Eschelon, Integra, MCI Worldcom and AT&T showed, modern digital switches have no real internal capacity constraints at meaningful calling length and frequency levels. Further, Qwest's actual fill levels (when dropping switches that have very low existing fill levels) show that Qwest is capable of operating the network with substantially higher fill levels than its witnesses advocate. The Commission finds that the switching fill levels advocated by the Joint CLECs' witnesses of 94 percent are attainable, particularly in light of uncontested evidence that Qwest currently operates some switches in Utah at fill levels approaching 98 percent. We also note that Qwest has to serve the current demand, and in some isolated areas of its Utah territory, such high levels of fill simply are not attainable. We direct the Division to adopt a 90 percent switching fill factor level. The 90 percent fill level balances the competing facts that much higher fill levels in some switches are

possible (as demonstrated by Qwest's own practices), but that due to the location and dispersion of customers, lower fill levels will be required in some switches.

G. Forward looking adjustment

The different forward looking adjustments proposed by AT&T, the Division, and Qwest are estimates of how far the current network operations expense, on a per dollar of network investment basis, should be reduced to reflect that the current system is not a TELRIC-compliant system. The adjustment is a measure of the difference between Qwest's current practices and the practices that would be required if the network were actually TELRIC-compliant.

Complicating the matter is the fact that Qwest has recently completed the extensive process of qualifying for Section 271 relief from the FCC and some of those costs are reflected in the ARMIS data. Obviously the expenses Qwest incurred to conduct that testing process are in addition to the expenses required to operate their own network, which in turn are even larger than the expenses that would be associated with operating a TELRIC-compliant network.

Expert testimony differed in many ways, but the fundamental difference is that Qwest compared the expenses calculated by the models to its current expenses, while the Division and the Joint CLECs compared the calculated expenses to a total network investment. It is clear that a network with fewer, and therefore larger, distribution areas, more efficient equipment in general, and a design that requires less manual intervention, would require significantly less network operations expense than does Qwest's current network. Further, it is clear that Qwest's expenses in recent years have been higher due to the Section 271 testing that occurred. All of these factors argue for reducing the allowable expenses. The Commission therefore finds that the level of network operations expense (as evidenced by the high forward looking adjustment factor) proposed by Qwest is too high. However, the Commission also finds the Joint CLECs' forward looking adjustment factor is unrealistic. No substantive evidence was presented to suggest that Qwest could reduce it current expenses by 50 percent, as the Joint CLEC's claimed, if its network were TELRIC-compliant. We find that the Division's forward looking adjustment input value of 85 percent is reasonable. As previously discussed in section E above, we do not adopt the Division's other modifications for the network operations expense calculation. We note that because the Division also adjusted expenses, the allocation of expenses, and added in an explicit network operations expense factor, the estimated level of network operations expense that the HAI model calculates when starting with the Division's 85 percent factor is significantly higher than the level of expense contained in the Division's testimony.

H. Fiber Copper Plant Crossover Length

The HAI model contains a field that allows the modeler to choose a maximum distance for copper feeder, at which point the model changes over to fiber feeder. The Model uses this information as a rule, not as an optimization technique. We understand that there are advantages to installing fiber for longer length runs of feeder. These advantages are primarily related to network performance, reliability, and on-going operating costs. However, if the model were fully TELRIC-compliant, then reducing the crossover point would have an identifiable impact on the cost of running the network, not just on the cost of building the network. As has been explained above, the portion of the HAI model that calculates network operations expense is not TELRIC-compliant. As a result when the fiber/copper crossover point is set at a realistic level (9,000 feet) the model assigns higher construction costs to be recovered without a corresponding reduction in network operating costs. Therefore, the Commission is forced to set this variable somewhat higher than is standard practice to compensate for the missing benefits in the HAI model of setting it to a lower level. By simple inspection of the results of model runs setting the crossover point between 9,000 and 18,000 feet, it is apparent that the primary cost impacts occur when moving below 12,000 feet. As a result, we direct the Division to set the crossover length at 12,000 feet. If, in the future, the network operations expense level portion of the model is made TELRIC compliant, then this factor may be set to the more realistic length of 9,000 feet.

I. DLC Investment

The Commission finds that setting the High Density DLC Common Equipment Investment to the midpoint ($23,421) of the Division and AT&T estimates is reasonable. In addition, the Commission finds that using DLC equipment does result in a cost savings over analog lines on a per line basis. We direct that the Analog Line Circuit Offset for DLC Investment be set at $12.00.

J. Holding Time Multipliers

The Commission finds that the record is insufficient to justify altering the residential and business holding time multipliers from their AT&T default values. Accordingly we direct that these be set to a value of one.

SUMMARY OF EFFECTS

The impact of the changes to the HAI model made in this Order are weighted average Qwest service-territory wide monthly rate of $12.95 for the unbundled loop, and $3.80 for monthly unbundled flat-rated switching. We have not calculated the individual deaveraged rates. No party advocated changing the current urban, suburban, and rural wire center designations in testimony. In reviewing those designations we note that some designations appear to lack a logical justification. If parties desire to re-designate certain wire centers, that may be pursued in a future docket. The amount of network operations expense the Commission modified HAI model calculates is $37,388,950. We find this amount to be a reasonable level.

ORDER

1. The Division shall update its version of the HAI model with the Commission's changes discussed above.

2. The Division shall submit the updated HAI model and such materials as deemed necessary for all parties to this Docket to review and verify the Division's changes as ordered by the Commission.

3. After verifying the Division's modifications to the HAI model, Qwest shall file revised deaveraged prices for the unbundled loop, and for flat-rate switching that are consistent with the changes and rates adopted in this Order.

4. Pursuant to Utah Code Annotated §63-46b-13, an aggrieved party may file, within 20 days after the date of this Report and Order, a written request for rehearing/reconsideration by the Commission. Pursuant to Utah Code Annotated §54-7-15, failure to file such a request precludes judicial review of the Report and Order. If the Commission fails to issue an order within 20 days after the filing of such request, the request shall be considered denied. Judicial review of this Report and Order may be sought pursuant to the Utah Administrative Procedures Act (Utah Code Annotated §§63-46b-1 et seq.).

DATED at Salt Lake City, Utah this 5th day of May, 2002.

/s/ Stephen F. Mecham, Chairman

/s/ Constance B. White, Commissioner

/s/ Richard M. Campbell, Commissioner

Attest:

/s/ Julie Orchard,
Commission Secretary

G#33596

1. The Division changed the internally calculated percentage allocation factor found on spreadsheet "00 Actuals" in cells I115 and I116 of the HAI model's output, we direct that the model's internally calculated percentages be used.