

Confidential Release

Case Number:

93-487-TP-ALT

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Confidential version of post-hearing brief of Time Warner AxS.

CONFIDENTIAL

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
The Ohio Bell Telephone Company)	Case No. 93-487-TP-ALT
for Approval of an Alternative)	
Form of Regulation.)	
In the Matter of the Complaint of the)	
Office of the Consumers' Counsel,)	
Complainant,)	
v.)	Case No. 93-576-TP-CSS
The Ohio Bell Telephone Company,)	
Respondent,)	
Relative to the Alleged Unjust and)	
Unreasonable Rates and Charges.)	

CONFIDENTIAL PORTION
of
POST-HEARING BRIEF
of
TIME WARNER AxS

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October 28, 1994

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**CONFIDENTIAL PORTION
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TIME WARNER Axs**

In her prefiled testimony, Company witness Hermerding relied upon a survey conducted after the issuance of the Staff Report to support the following testimony:

The implication of this research is that even with no other improvement in service or price, nearly half of Ameritech Ohio's customers would be inclined to switch to a competing local exchange carrier simply because Ameritech Ohio was unable to provide their long distance service.

Co. Ex. 35.0 at 16. However, when the survey question at issue is reviewed, it reveals that the answers to the question simply cannot be relied upon to support the position argued by the Company.

The survey question begins with a prefatory statement and based upon a change in that statement the survey then asks two questions:

Today, in Ohio, there is only one company that provides your local telephone service.¹ Suppose that more than one company could provide your local telephone service. If you had a choice, would you prefer:

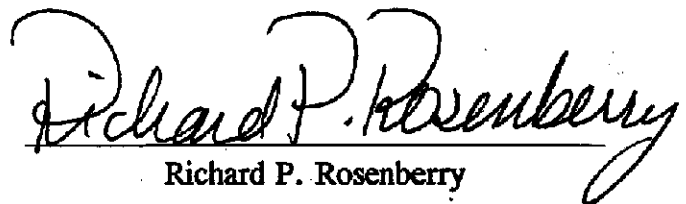
- ☐ A. One company that could provide your local telephone service and all of you long distance service?
- ☐ B. The current arrangement where one company provides your local telephone service and a second company provides your long distance service?

Note that the second question assumes, contrary to the preface, that instead of having a multiple of choices for local service that the "current arrangement" is in place. In other words, question A assumes a regulatory framework presenting multiple suppliers for both local and long distance service, while question B assumes that the customer is locked into the current local service provider. In this circumstance, if customers prefer choices, the natural reaction to anyone comparing these two questions is rather obvious: the option that presents a choice of local carriers would be preferable to one presenting the narrower opportunity to utilize only the local company. As a result, there is little utility to this survey, and the responses to these two questions.

¹ The Company has argued throughout various witnesses' testimony that Ameritech Ohio faces competition for all its services. There is no little irony in this survey statement that "in Ohio, there is only one company that provides your local telephone service."

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Confidential Portion of Post-Hearing Brief of Time Warner AxS was served upon the following parties of record this 28th day of October, 1994, via electronic transmission, hand-delivery or ordinary U.S. mail, postage prepaid.


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