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O'Keefe Ashenden Lyons & Ward
A Partnership Including Professional Corporations

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Joseph E. Donovan
jdonovan@oalw.com

January 9, 2001

VIA OVERNIGHT MAIL


Doug Jennings
Attorney Examiner
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, Ohio 43215-3793

RE: Supplemental Authority in support of the Payphone Association of Ohio's
Motions to Compel the Ohio LECs to adequately respond to the PAO's
data requests, PUCO Case No. 96-1310-TP-COL.

Dear Examiner Jennings:

On behalf of the Payphone Association of Ohio, enclosed please find a
Supplemental Authority supporting the PAO's Motions to Compel the Ohio LECs to
adequately respond to the PAO's data requests. The PAO believes that recent compliance
filings by the Wisconsin LECs, including Ameritech and GTE (Verizon), in the FCC
docket DA 00-347 provide insight as to the cost support filings required under the FCC's
new services test.

Sincerely,


Joseph E. Donovan

Enclosure

CC: all parties on service list
Docketing division, PUCO

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STATE OF OHIO
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Investigation into the Implementation)
of Section 276 of the Telecommunications)
Act of 1996 Regarding Pay Telephone Services.)

Case No. 96 - 1310- TP- COI

NOTICE OF FILING

Please take notice that on January 10, 2001, the undersigned filed an original and sixteen (17) copies of each of **The Payphone Association of Ohio's Supplemental Authority in Support of its Motions to Compel Discovery** with the Clerk of the Public Utilities Commission of Ohio, via Federal Express.



Joseph E. Donovan

CERTIFICATE OF SERVICE

I, Joseph E. Donovan, an attorney, on oath state that I served this **Notice of Filing** and a copy of each of **The Payphone Association of Ohio's Supplemental Authority in Support of its Motions to Compel Discovery** on the service list above by depositing the same in the U.S. Post Office Box at 30 N. LaSalle Street, Chicago, Illinois, with first class postage prepaid on August 7, 2000.



Joseph E. Donovan

Joseph E. Donovan
O'Keefe, Ashenden, Lyons & Ward
30 North LaSalle Street, Suite 4100
Chicago, IL 60602
(312) 621-0400

Service List
Case No. 96-1310-TP-COI

Alltel Ohio, Inc.
Fifth Third Center
21 E. State Street
Columbus, OH 43215

Alltel Ohio, Inc.
Western Reserve Telephone co.
Dennis Mervis, President
50 Executive Parkway
Hudson, OH 44236

GTE North, Inc.
John W. Kennedy
100 Executive Drive
Marion, OH 43302

Judy Saunders
MCI
Bell, Royer & Saunders
33 S. Grant Street
Columbus, OH 43215

Sprint/United Telephone North
Central
Gene Gratz
P.O. Box 3555
Mansfield, OH 44907

R.Chad Edkhart
United Telephone Co.
900 Springmill Street
P.O. Box 3555
Mansfield, OH 44907

AT&T Communications of Ohio, Inc.
Benita Kahn
Vorys, Sater, Seymour & Pease
52 E. Gay Street
P.O. Box 1008
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William A. Adams
Dane Stinson
Arter & Hadden L.L.P.
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One Columbus, Suite 2100
Columbus, Ohio 43215

STATE OF OHIO
PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Commission's)
Investigation into the Implementation)
Of Section 276 of the Telecommunications)
Act of 1996 Regarding Pay Telephone)
Services.)

Case No. 96-1310-TP-COI

**THE PAYPHONE ASSOCIATION OF OHIO'S SUPPLEMENTAL
AUTHORITY IN SUPPORT OF ITS MOTIONS TO
COMPEL DISCOVERY**

The Payphone Association of Ohio, ("Payphone Association" or "PAO"), through its attorneys O'Keefe Ashenden Lyons & Ward, pursuant to Ohio Rule of Civil Procedure 15(E), provides the following supplemental authority and information in Support of the Payphone Association's Motion to Compel Ameritech Ohio, Incorporated ("Ameritech"), GTE North, Inc. ("GTE"), Cincinnati Bell Telephone Company ("CBT") and United Telephone Company of Ohio, d/b/a/ Sprint ("Sprint") to fully respond to the Payphone Association's First set of Data Requests. The PAO states the following:

BACKGROUND

On March 14, 2000, the PAO submitted a copy of a then-recent FCC Common Carrier Bureau Order entered in DA 00-347 released on March 2, 2000 as supplemental authority for the Payphone Association of Ohio's issues list filed in this docket.. That Order mandated that the Wisconsin LECs, including Ameritech and GTE (Verizon), to file cost studies supporting their payphone tariff rates. On August 12, 2000, Ameritech and GTE submitted those cost studies.

On June 7, 2000, the Payphone Association of Ohio filed a Motion to Compel against GTE North, Inc. requesting an Order compelling GTE to answer fully the PAO's First Set of Data Requests. On June 8, 2000, the PAO filed a similar Motion to Compel against Ameritech Ohio. Further, on June 12, 2000, the PAO filed two additional Motions to Compel against Sprint and CBT seeking similar Order mandating full responses to the PAO's First Set of Data Requests.

In each of these Motions, the PAO sought to have the LECs provide full and complete responses to the PAO's requests to have access to a number of the LECs' cost studies and supporting work papers upon which the LECs rely in their claim that their payphone access rates pass the FCC's new services test and Section 276 of the Federal Communications Act (47 U.S.C.A. § 276).

Included in the PAO's requested cost studies in this docket are the studies and work papers associated with the LECs costs for providing usage and message toll service to the members of the PAO. See, for example, the PAO's Data Request numbers 2-5 submitted to GTE and Ameritech. The PAO believes that the cost documentation used as a basis for the LEC's usage rates are relevant to the current investigation and should be provided the PAO as requested in its data requests. The LECs, however, refuse to respond to these data requests. The recent cost studies provided by Ameritech and GTE to the FCC in its investigation of the two companies' Wisconsin payphone tariffs provide additional insight as to whether the two companies believe the new services test requires the usage cost information.

Also included in the data requests are a number of requests dealing with the requirement that the LECs' payphone revenues pass an imputation analysis as required by

the FCC and Section 276 of the Telecommunications Act of 1996 (47 U.S.C.A. § 276). Recent decisions reached by the PUCO provide further authority supporting the PAO's Motion to Compel the LECs to provide the requested imputation analysis.

1. THE PAO IS ENTITLED TO REVIEW THE LECs' USAGE COST STUDIES.

On March 14, 2000, the PAO provided this Commission with a copy of the FCC Common Carrier Bureau's Order in DA No. 00-347, *In the Matter of Wisconsin Public Service Commission*, where the Bureau explained what the Wisconsin LECs, including Ameritech and GTE, must do in order to pass the new services test for payphone services. As the PAO has explained, the *Wisconsin Order* provides guidance to the state commissions on the appropriate manner in which to apply the FCC's new services test in the context of LEC provisioning of payphone access services. In that *Order*, the Bureau explained that, in order "[t]o satisfy the new services test, an incumbent LEC filing payphone line rates must demonstrate that the proposed rates do not recover more than the direct costs of the service plus 'a just and reasonable portion of the carrier's overhead costs.'" *In the Matter of Wisconsin Public Service Commission*, Order Directing Filings, CCB/CPD DA 00-357, released March 2, 2000, at ¶ 9.

The Bureau also ordered the LECs to file cost data supporting its usage rates charged the payphone providers. In Paragraph 7 of the *Wisconsin Order*, the Bureau held that:

"the incumbent LECs should file a copy of a tariff and supporting information, in accordance with the ordinarily applicable Commission rules (e.g., usage-sensitive elements whether specified in the payphone line tariff or cross-referenced to another tariff as well as flat rate elements) and should provide cost support for each rate element in accordance with the cost support requirements described below. Rates, terms and conditions for other services commonly used by payphone service providers ("PSPs") (e.g., call screening services) should also be

included. [fn. omitted] For each rate element, the incumbent LEC must submit complete cost studies with full documentation." *Id.* at ¶ 7 (emphasis added).

As Ameritech acknowledges in its cover letter for the cost studies, the Order in DA-347

"requires Ameritech Wisconsin to submit such cost support data in connection with its intrastate tariffed rates for payphone line service and other intrastate tariffed services provided to payphone service providers in Wisconsin. *These services include:* access line, coin line access line, restricted coin access, answer supervision, call screening, *toll usage, local usage*, directory assistance, as well as nonrecurring elements for service connection." (emphasis added)

See August 14, 2000 letter requesting confidential treatment of costs data from Charles Scharnberg, Senior Counsel at SBC, to Magalie Roman Salas, FCC Secretary, at page 1 (attached hereto as Attachment A).

On August 12, 2000, in support of their Wisconsin rates, the Wisconsin LECs (including GTE and Ameritech) filed with the FCC their compliance tariffs including the supporting cost documentation. It is important for this Commission to note that *both GTE and Ameritech acknowledge in their Wisconsin tariff filings that the new services compliance filings require cost documentation to support their usage rates charged to payphone providers.*

Although Ameritech may not agree with the FCC's determination that the usage sensitive elements are subject to the new services test, it did recognize that the Wisconsin Order, and, thus, the new services test, "seemingly requires submission of tariffs and cost support for local usage, toll usage and directory assistance. . . ." See Attachment A of August 14, 2000 letter from Charles Scharnberg, Senior Counsel at SBC, to Magalie Roman Salas, FCC Secretary, at page 4 (attached hereto, with a redacted portion of Ameritech's usage cost study, as Attachment B).

Similarly, in its FCC tariff filing in the Wisconsin proceeding, GTE acknowledges that both the Wisconsin Order and, thus, the new services test require the submission of usage cost documentation. In a September 20, 2000 supplement to its August 12, 2000 tariff filing, GTE explains that the extra submission "provides additional cost data in support of the \$2.50 usage cost component shown on Schedule 3-3 of the original filing." See September 20, 2000 letter from W. Scott Randolph, Director-Regulatory Matters, to Magalie Roman Salas, FCC Secretary (attached hereto, with a redacted version of GTE's usage cost data, as Attachment C). This is the same type of information the PAO seeks in its Data Requests to the Ohio LECs.

The FCC required the LECs to submit usage cost studies in support of the LECs' claim that their rates pass the new services test. If the PUCO is to implement the FCC orders which apply the same new services test to Ohio payphone access services, then it should require the same submissions. Whether they like the FCC's decision or not, Ameritech and GTE have acknowledged that the FCC orders implementing the new services test require cost support for their usage rates. It is disingenuous for Ameritech and GTE to acknowledge that the new services test and the related FCC orders require submission of usage cost documentation in Wisconsin and continue to resist providing that same information here in Ohio.

This Commission should require nothing less than what the FCC does in analyzing whether the LECs payphone tariffs comply with the FCC's own new services test. As Ameritech and GTE have demonstrated, the FCC's new services test requires an analysis of the LECs usage cost data in order to properly determine the appropriate usage rate for payphone services. Failure to require such in this instance means that the PUCO

is not properly following the FCC's requirements for the new services test. The PAO's data requests seeking the LECs' usage cost documentation are extremely relevant to this investigation. This Commission must compel the LECs to provide the requested information or it will be shirking its duties under Section 276 and the FCC's *Payphone Orders*.

2. THE OHIO RULES FOR ALTERNATIVE REGULATION REQUIRE AMERITECH TO SUBMIT AN IMPUTATION ANALYSIS IN SUPPORT OF ITS CLAIM THAT ITS PAYPHONE REVENUES ARE NOT RECEIVING SUBSIDIES.

In its pleadings related to its various Motions to Compel filed in early June 2000, the PAO argued that the LECs must submit an imputation analysis to show that the LECs payphone revenues are not subsidized by noncompetitive services. The PAO asked each of the LECs to provide an imputation test consistent with Local Service Guidelines, Section V(D)(3), for the years 1996 through the present. See, for instance, PAO-AM 28 and PAO-GTE 28. Upon further review of the Local Service Guidelines and recent Commission activity, the PAO also finds additional support for its arguments that the LECs need to prove their payphone revenues are not subsidized by the noncompetitive services by means of an imputation test.

A. The Commission's decision reached in Case No. 93-847-TP-COI requires Ameritech to file an imputation analysis.

In March 2000, Ameritech and certain interveners in Case No. 93-487-TP-COI, *In the Matter of the Application of Ameritech Ohio for Approval of an Alternative Form of Regulation*, filed a Stipulation to modify and extend Ameritech's Alt. Reg. Plan. The Stipulation is attached hereto as Attachment XX. Under the terms of the Stipulation

adopted by the Commission: (1) Message Toll Services (MTS) are reclassified from Cell 2 to Cell 4 (Stipulation at ¶ B4); (2) all services, other than residence Cell 1 core services (i.e., non-residence Cell 1 services), which are declared Competitive Telecommunications Services in Case No. 99-563-TP-COI, will be deemed to have met the criteria for Cell 4 services (Stipulation at ¶ B6); and, (3) all Cell 4 services, including those moved to Cell 4 as a result of numbers (1) and (2) above, are detariffed and removed from the price cap plan and not subject to Commission overview or review (Stipulation at ¶ B5). In short, the Commission reclassified a number of services to Cell 4 and then removed those services from the price cap plan altogether. In response to the PAO's objection that the Stipulation does not provide an imputation analysis of those services detariffed and removed from the price cap plan, including non-residence business core services, the Commission held that the PAO's objections "are more suitable for consideration in our pending payphone generic proceeding, Case No. 96-1310-TP-COI." *Opinion and Order*, Case No. 93-487-TP-COI, dated April 27, 2000 at page 21. On May 26, 2000, the PAO filed an Application for Rehearing of the April 27, 2000 *Order* which, *inter alia*, again raised the PAO's concerns regarding the lack of imputation analysis contained in the Stipulation and its resulting order. On June 22, 2000, the Commission entered an *Entry on Rehearing* in Case No. 93-487-TP-COI, denying the PAO's Application for Rehearing. In compliance with the Commission's wishes to have its arguments raised in this docket, the PAO files this Supplement.

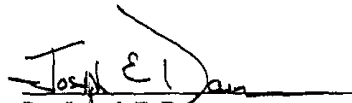
The Commission adopted the Rules for Alternative Regulation of Large Local Exchange Companies ("Alt. Reg. Rules") in Case No. 92-1149-TP-COI, *In the Matter of the Commission's Promulgation of Rules for the Establishment of Alternative Regulation*

for Large Local Exchange Telephone Companies. These rules specifically require the LEC subject to the Alt. Reg. Plan to file an imputation test for any Cell 4 service. A copy of the rules is attached hereto as Attachment XX. "All Cell 4 services shall be detariffed. However, a cost test demonstrating that the price charged is above the LRSIC shall be provided for each Cell 4 service." Alt. Reg. Rule XII.E.3. Since the Commission specifically referred to this docket as the appropriate means by which the PAO should address its concerns over whether Ameritech's payphone services pass muster in an imputation analysis, it is incumbent upon the Commission to then require Ameritech to provide the necessary imputation data. Thus, the PAO's data requests dealing with the required imputation analysis are relevant to the current docket and the Commission should enter an Order compelling Ameritech to comply with the PAO's data request.

WHEREFORE, the PAO again requests the Commission to compel the Ohio LECs to provide the requested usage cost information and imputation analysis forthwith so the PAO can properly prepare its testimony and prepare for hearings.

Respectfully submitted,

Payphone Association of Ohio


By: Joseph E. Donovan
one of its attorneys

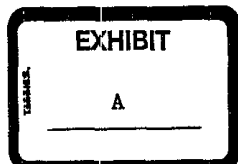
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Charles J. Schamberg
Senior Counsel

SBC Telecommunications, Inc.

1401 I Street, NW
Suite 1100
Washington, DC 20005
Phone 202-328-8893
Fax 202-408-5763



August 14, 2000

HAND DELIVERED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

RE: In the Matter of Wisconsin Public Service Commission, Order Directing Filings,
CCB/CPD No. 00-1; Request for Confidential Treatment of Cost Support Data

Dear Ms. Salas:

SBC Communications Inc., on behalf of Wisconsin Bell, Inc. (Ameritech Wisconsin), submits a request for confidential treatment of cost support data filed pursuant to Order DA 00-347 released March 2, 2000 in docket CCB/CPD No. 00-1. This order requires Ameritech Wisconsin to submit such cost support data in connection with its intrastate tariffed rates for payphone line service and other intrastate tariffed services provided to payphone service providers in Wisconsin. These services include: access line, coin line access line, restricted coin access, answer supervision, call screening, toll usage, local usage, directory assistance, as well as nonrecurring elements for service connection.

Statement pursuant to 47 C.F.R. 0.459(b)

- (1) Identification of the specific information for which confidential treatment is sought.

Ameritech Wisconsin requests that the pages marked "Highly Confidential" be treated on a confidential basis, pursuant to the Commission's decision in Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission, GC Docket No. 96-55 (FCC 98-184) (rel. Aug. 4, 1998) (Confidential Information Order).

The attached documents for which confidential treatment is being requested contain commercially sensitive cost information including labor rates, and an annual cost factor that includes depreciation, cost of money, income taxes, and maintenance expense.

- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.**

The information was submitted in docket CCB/CPD No. 00-1 as required by order DA 00-347 released on March 2, 2000 in that proceeding.

- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.**

The detailed cost information provided by Ameritech Wisconsin displays the annual cost factor that includes the capital costs (depreciation, cost of money, and income tax) and maintenance expenses. In addition to the expense data, Ameritech Wisconsin provided the installed cost (total investment vendor cost).

- (4) **Explanation of the degree to which the information concerns a service that is subject to competition; and**

- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.**

If competitors were provided all of this information, it would obviously reveal in detail Ameritech Wisconsin's costs for access lines, coin line access lines, local usage per message, toll usage and the other services listed in (1) above.

Exhibit A contains a list of competitors capable or potentially capable of furnishing access lines, coin access lines and the other services listed in (1) above. These competitors would benefit from disclosure of the documents for which confidential information is requested. These competitors could use the confidential information to assist in pricing their own competing services. The Commission has recognized that competitors and potential competitors would benefit from the disclosure of similar information.¹

A firm will be harmed if detailed cost information about its production processes is made public. Such detailed cost information is not generally made available to competitors, customers, industry analysts, academicians, and the general public by U.S. industries. Indeed, it is considered an anti-competitive practice for such firms to trade price information in many instances, particularly in situations requiring sealed bids from several competitors vying for a specific customer contract.

The detailed annual cost factor information is as confidential as the investment data in that the annual cost factor could divulge Ameritech Wisconsin's cost relationship to the vendor

¹ Local Exchange Carriers' Rates Terms and Conditions for Expanded Interconnection Through Virtual Collocation for Special Access and Switched Transport, CC Docket No. 94-97, Order (FCC 98-89) (rel. May 15, 1998), at para. 5.

cost. For example, if a competitor obtains the same price from the vendor for the same piece of equipment, the competitor could subtract the annual cost from Ameritech Wisconsin's services and develop a cost comparison, track, and eventually identify the annual cost factor used by Ameritech Wisconsin. The pieces of cost detail, if provided on the public record, would allow Ameritech Wisconsin's competitors to set their prices below Ameritech Wisconsin's prices once they have developed a close estimate of Ameritech Wisconsin's factor.

Obviously, if Ameritech Wisconsin's costs become public information, all firms seeking to compete with Ameritech Wisconsin would have a clear target for pricing their own services. Ameritech Wisconsin's competitors will be able to set prices to enhance their ability to capture Ameritech Wisconsin customers.

Ameritech Wisconsin's cost data can quickly reveal to a competitor if it is more or less cost efficient than Ameritech Wisconsin in a particular market. If Ameritech Wisconsin is the most efficient provider, potential competitors know immediately that they will be more likely to maximize profits if they are geared toward satisfying some specific niche demand. This clearly benefits Ameritech Wisconsin's competitors as they design marketing strategies aimed at capturing as much of Ameritech Wisconsin's business as possible.

If Ameritech Wisconsin's cost information were publicly available, customers requesting bids would strive to obtain prices as close to Ameritech Wisconsin's incremental costs as possible. Ameritech Wisconsin might eventually be forced to choose between losing its largest customer accounts to competitors or retaining these customers by pricing the services without any contribution toward recovery of Ameritech Wisconsin's common and overhead costs. Of course, if a firm's largest customers contribute nothing toward overhead cost recovery, prices charged to smaller customers must increase to permit the recovery of its total cost.

As shown in Exhibit C, the attached paper by David C.D. Rogers Associates, "cost data does not have to be detailed to be helpful."² The more data a firm obtains about its competitors, the easier it is for that firm to determine what competitors can and will do. Therefore, it is extremely critical that Ameritech Wisconsin not be required to make its cost data available to the public.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure; and
- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

²Attached, as Exhibit C is a paper by David C.D. Rogers Associates entitled "The Value of Cost Data to Competitors."

This information has been maintained on a confidential basis within Ameritech Wisconsin and would not ordinarily be disclosed to parties outside the company, as described in the Declaration of Jeffrey Lindsey, attached as Exhibit B. Company practices instruct employees not to disclose outside the company cost information such as that involved in this FOIA request.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.

The material must be held from public disclosure for an indefinite period. Confidential treatment must be afforded the materials as long as the costs in question would provide a basis for competitors to gain insight into Ameritech Wisconsin's pricing decisions. Ameritech Wisconsin cannot determine at this time any date on which these costs would become "stale" for such a purpose.

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

Under applicable Commission and Court rulings, the subject material must be kept free from public disclosure. Exemption 4 of the Freedom of Information Act shields information which is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. See Washington Post Co. v. U.S. Department of Health and Human Services, 690 F.2d 252 (D.C. Cir. 1982). The attached information clearly satisfies the first two elements of that test.

With respect to the third element of the above test, information is considered to be "confidential" if disclosure is likely to (1) impair the government's ability to obtain necessary information in the future, or (2) harm substantially the competitive position of the person from which the information was obtained. National Parks and Conservation Ass'n v. Morton, 498 F.2d 765, 770 (D.C. Cir. 1974) (National Parks I.)

The Commission has specifically held that disclosure of data gathered by the Commission under its audit authority would be likely to impair the government's future ability to obtain such data, notwithstanding the statutory authority to compel production. See, In the Matter of Martha H. Platt On Request for Inspection of Records, FOIA Controls Nos. 90-63 (October 3, 1990).

The Commission has recognized that competitive harm can result from the disclosure of confidential business information that gives competitors insight into a company's costs, pricing plans, market strategies, and customer identities. See, In re Pan American Satellite Corporation, FOIA Control Nos. 85-219, 86-38, 86-41, (May 2, 1986).³

³ Further, the Commission has ruled that not only should such data be protected but also that information must be protected through which the competitively sensitive information can be determined. Allnet Communications Services, Inc. Freedom of

Protective Order Requested

Ameritech Wisconsin acknowledges that the Bureau is directed by the Commission's Confidential Information Order, at paras. 35-42, to routinely employ the standard protective order detailed in the Confidential Information Order for materials submitted under a request for confidential treatment unless complete confidentiality is requested. If any person (other than an agency employee working directly on the matter in connection with which these documents are submitted) requests an inspection or requests a copy of the documents or any portion of them other than under the terms of an appropriate protective order, please give me sufficient advance notice prior to any such disclosure to allow Ameritech Wisconsin to pursue appropriate remedies to preserve the confidentiality of the information.

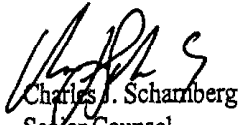
Any confidential information required to be produced under the terms of an appropriate order shall be maintained and made available for inspection at the following locations:

Ameritech Wisconsin

David H. Hostetter
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005

Myron Cauble Jr.
722 N. Broadway
Floor 14
Milwaukee, WI. 53202

Very truly yours,


Charles J. Schamberg
Senior Counsel

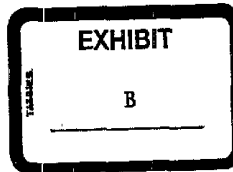
Attachments

Information Act Request, FOIA Control No. 92-149, Memorandum Opinion and Order (released August 17, 1993) at p. 3. The Commission's decision was upheld in a memorandum opinion of the U.S. Court of Appeals for the D.C. Circuit, which affirmed a U.S. District Court decision protecting the information. Allnet Communications Services, Inc. v. FCC, Case No. 92-5351 (memorandum opinion issued May 27, 1994, D.C. Cir.).

SBC Telecommunications, Inc.
Charles J. Scharnberg
Senior Counsel



August 14, 2000




Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW A325
Washington, D.C. 20554

Re: Submission of Wisconsin Bell, Inc. (Ameritech Wisconsin); In the Matter of
Wisconsin Public Service Commission, Order Directing Filings, CCB/CPD No. 00-1

Dear Ms. Roman Salas:

Submitted for filing herewith, per the CCB's Order DA 00-347 released on March 2, 2000 in this proceeding, are the original and six copies of the Submission of Wisconsin Bell, Inc. Also submitted is the Freedom of Information Act letter dated August 14, 2000 of Charles J. Scharnberg indicating that Appendices (1) and (2) of this Submission include highly confidential cost data. Ameritech Wisconsin requests that this information not be released except pursuant to the Commission's standard protective order. Ameritech Wisconsin is also providing two copies of the submission, subject to the same FOIA letter, to the Competitive Pricing Division. Additionally, a redacted version of the submission is provided to ITS, Inc., the Commission's duplicating contractor at its office at 1231 20th St., N.W., Washington, DC 20036.

Thank you for your assistance in this matter and let me know if you have any questions.


Charles J. Scharnberg,
Senior Counsel

Attachments.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Wisconsin Public Service Commission)	CCB/CPD No. 00-1
)	
Order Directing Filings)	

SUBMISSION OF WISCONSIN BELL, INC.

Pursuant to the Common Carrier Bureau's Order (DA 00-347) released herein on March 2, 2000 ("the Order"), Wisconsin Bell, Inc. (Ameritech Wisconsin) submits its Wisconsin intrastate payphone service tariffs along with supporting cost information. Attached as Appendix (1) is a "New Services Test Overhead Loadings Analysis" comparing services provided in connection with payphone lines with tariffed retail services available to non-Payphone Service Provider (PSP) end user customers. The cost studies are attached as Appendix (2). Copies of the requested tariffs, as well as the Ameritech Wisconsin business exchange access services tariff, are attached collectively as Appendix (3). Appendices (1) and (2) embody highly confidential and proprietary cost information and should not be released except under protective order as explained in the Freedom of Information Act letter of Charles J. Schamberg dated August 14, 2000 a copy of which is attached to each of these Appendices.

INTRODUCTION

The Order, relying on section 276 of the Telecommunications Act, directs the four largest LECs in Wisconsin, including Ameritech Wisconsin, to submit copies of their currently effective tariffs for intrastate payphone service offerings. The LECs are also directed to submit cost support for these offerings to determine whether the LECs' payphone line rates satisfy the "new

services test" and other section 276 requirements. The Order requires forward looking cost support like that prescribed by the Commission to establish rates for unbundled network elements provided to competing telecommunications carriers under 47 U.S.C. § 251 and states that UNEs appear to be "comparable services" to payphone line services for purposes of justifying overhead allocation.

As a part of the LEC Coalition, Ameritech Wisconsin sought Commission review of this Bureau Order on April 3, 2000.¹ The LEC Coalition's Application for Review is pending along with its Request for a Stay of the Common Carrier Bureau's "New Services Test" Order filed on the same date. Stated briefly, the Application for Review cites two fundamental errors in the Order requiring its withdrawal: (1) the Order's misapplication of the "new services test", by among other things, treating basic payphone access lines like UNEs subject to TELRIC pricing; and, (2) the Order's conclusion that the Bureau (and Commission) has authority, not merely to determine the methodology for intrastate retail pricing of basic payphone lines, but to prescribe state-tariffed, intrastate retail rates for those lines. Ameritech Wisconsin incorporates herein the LEC Coalition's Application for Review, its Request for a Stay, and the LEC Coalition's Reply in Support of its Application for Review and Request for Stay filed on May 30, 2000. This submission is made subject to all of the objections stated in these filings, as well as those stated below.

DESCRIPTION OF FILING

Ameritech Wisconsin submits copies of its intrastate payphone service tariffs in compliance with the Order. (Appendix 3). Ameritech Wisconsin also submits forward looking "TSRILIC" cost studies for payphone service elements, with full documentation, to meet the requirement of the Order for forward looking cost support. (Appendix 2). A TELRIC study was

¹ The LEC Coalition's Application for Review of the Common Carrier Bureau's "New Services Test" Order filed on April 3, 2000.

not done for the reasons stated in the LEC Coalition's Application for Review -- payphone service providers are end-users buying services at retail, not carriers obtaining UNEs subject to TELRIC pricing.² Moreover, the hypothetical "most efficient network" component of TELRIC was invalidated in the recent decision of the Eighth Circuit Court of Appeals³ and cannot be applied to telecommunications carriers purchasing UNEs, let alone to non-carrier retail end-users.

TSLRIC, as applied in state jurisdictions such as Wisconsin, is designed to be a price floor for intrastate retail services. Unlike TELRIC, which identifies and assigns costs to the greatest extent possible, TSLRIC considers certain costs as shared costs rather than assigning them to a particular service.⁴ TSLRIC anticipates that these shared costs are recovered through the pricing function and this recovery is one of the specific purposes of the price mark-up. Because of the difference in handling of shared and common costs between the two kinds of cost studies, the TSLRIC cost basis to which the mark-up might be applied would not match the cost basis in a TELRIC study. Additionally, pricing standards applied in state jurisdictions typically allow greater mark-up for some retail services to make other retail services more affordable to more subscribers or for other reasons.

² *First Report and Order*, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, 11 FCC Rcd 20541, 20615, ¶ 147. Moreover, as noted in the LEC Coalition's Reply in Support of Application for Review, Independent Payphone Providers opposing that Application concede that TELRIC is not applicable to payphone line pricing and assert that the Order does not mandate TELRIC.

³ *Iowa Utilities Bd. v. FCC*, No. 96-3321, 2000 WL 979117 (8th Cir. July 18, 2000).

⁴ See In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, *First Report and Order*, ¶ 678, 11 FCC Rcd 15499, 15846 ("... the amount of joint and common costs that must be allocated among separate offerings is likely to be much smaller using a TELRIC methodology rather than a TSLRIC approach that measure the costs of conventional services.").

Although the Order seemingly requires submission of tariffs and cost support for local usage, toll usage and directory assistance,⁵ Ameritech Wisconsin does not agree that such non-payphone specific elements are subject to the new services test on a stand alone basis for the reasons stated in the Application for Review, p. 16, n. 14. In its prior orders, the Bureau has identified two categories of offerings that are subject to the new services test: (1) the "basic network payphone line" and (2) "payphone specific, network-based features and functions used in configuring unregulated payphone operations provided by PSPs or LECs."⁶ Ordinary usage charges do not fall in the latter category, which includes "call blocking, coin supervision additive, coin signaling transmission additive, coin rating, original line number screening, and IDDD blocking."⁷ -- that is, vertical features of the switch, not usage of the network. Usage is not "payphone specific", but is "generally available to all local exchange customers and [is] only incidental to payphone service" -- like touchstone service which the Bureau has specifically held is not subject to the new services test.⁸ In any event, Ameritech Wisconsin's payphone line rates, considered as a whole, pass the new service test regardless of whether these usage elements are included.

The attached tariffs also include a rate element for Extended Community Calling (ECC); a service adopted in 1993 which expanded local calling areas to include intraLATA adjacent exchanges and those within 15 miles. This rate element is not included in the attached cost information because the Public Service Commission of Wisconsin, by order, adopted a statewide rate for this service applicable to all LECs.⁹

⁵ See the reference to "usage-sensitive elements . . . cross referenced to another tariff." in Paragraph 7 of the Order.

⁶ Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, 12 FCC Rcd 20997, 21004-05, ¶ 17 (1997).

⁷ Id. at 21005, n.49.

⁸ Id. at 21005, ¶ 18.

⁹ Findings of Fact, Conclusions of Law and First Final Order, Investigation Into the Extent of Competition in the IntraLATA Toll Telecommunications Market and of the Level of Regulation for IntraLATA Toll Telecommunications Service, No. 05-TI-119, September 28, 1993.

Ameritech Wisconsin is not sure that revenues from the EUCL and PICC should be included in applying the new service test. The EUCL assessed on payphone lines by Ameritech Wisconsin is \$5.26 per month. The federal multi-line PICC is \$1.667 per line per month and the intrastate multi-line PICC is \$.30 per line per month. Considered as a whole, Ameritech Wisconsin's rates pass the new services test whether or not these revenues are included.

THE SERVICES IN QUESTION PASS THE NEW SERVICES TEST

The new services test provides that when a LEC introduces a new service it must set rates based on direct costs plus a reasonable allocation of overhead. The Commission has ruled that direct costs may include accounting costs, and that it is for the LEC in the first instance to develop and justify an appropriate calculation of direct costs -- as long as the same costing methodology is used for all related services.¹⁰ The new service test is thus intended to give price cap LECs "additional pricing flexibility."

The Bureau cannot lawfully impose UNE overhead loading principles on LEC payphone service rates; nor can it require LECs to justify departure from UNE overhead loadings in this proceeding. As shown in the Application for Review, the Commission's *First Payphone Order* established that payphone service providers are not carriers entitled to purchase UNEs but instead, following the *Interconnection Order*, recognized that PSPs are retail end users. That Order thus precludes application of TELRIC pricing (and UNE overhead loading requirements) to payphone services.¹¹

In fact, the Bureau has not attempted to apply TELRIC in previous cases involving federally tariffed payphone services. Instead, consistent with Commission precedent, it approved federal tariffs for unbundled payphone features and functions with rates up to 3.4 times direct

¹⁰ See *ONA Order*, 6 FCC Rcd at 4531, ¶ 42.

¹¹ The APCC, in opposing the Application for Review, conceded that the Order "does not force the ILECs to adopt the same overhead allocations as for UNEs." APCC Opposition, p. 12.

costs and has acknowledged that loadings up to 4.8 times direct costs are acceptable.¹² The overhead loadings of Ameritech Wisconsin's payphone lines and associated features, when the offering is considered as a whole, are within these parameters.

The Bureau has also approved justification of payphone service overhead loading by reference to other LEC *retail* services -- not UNEs.¹³ Ameritech Wisconsin's payphone line rates, as well as the rates for associated features, pass the new services test on a comparable retail service analysis as demonstrated by the comparison of payphone line related services and elements to those available under tariff to other non-PSP business end users in Appendix (1). The payphone dumb line is comparable to a business access line provided at a slightly higher tariffed monthly rate. The EUCL and PICC apply equally to non-PSP multi-line business customers purchasing access lines under the applicable intrastate tariffs. Installation, Maintenance and Change and C.O. Line Connection charges are assessed at the same tariffed rate to other similarly situated retail business line customers. Local usage, toll usage and directory assistance provided in connection with payphone lines are comparable to tariffed retail services provided to non-PSP business customers and are provided at comparable rates.

Restricted Coin Access, although included in this submission, has no customers in Ameritech Wisconsin's service area in Wisconsin. This service is no longer offered and will be removed from the tariffs. Call Screening and Answer Supervision are also included in the

¹² *Memorandum Opinion and Order, Local Exchange Carriers' Payphone Functions and Features*, 12 FCC Rcd 17996, 18002 ¶ 13 (1997) ("With respect to Bell Atlantic's rates, we find no basis in the revised cost data to find that these overhead loadings are unreasonable or produce unreasonable rates in this case Bell Atlantic has explained that its overhead loadings used to develop the rates for its payphone features and functions are comparable with other tariffed services offered by Bell Atlantic. We also note that Bell Atlantic's overhead loadings are comparable to those of other LECs. Bell Atlantic's ratio of rates to direct costs for payphone features range from a low of zero times greater than the direct costs to a high of 3.4 times greater than the direct costs while the ratio of rates to direct costs for the payphone features offered by other LECs ranges from a low of zero times greater than the direct costs to a high of 4.8 times greater than the direct costs.")

¹³ *Id.* ¶ 13.

submission. Call Screening is utilized in only 31 payphone lines in Ameritech Wisconsin's service area in Wisconsin and Answer Supervision is utilized in only 85 payphone lines. The effects of the revenues and costs associated with these elements are therefore minimal.

Section 276 of the Telecommunications Act prohibits LECs from discriminating in favor of their own payphone operations in payphone service rates charged to competing payphone providers. Since Ameritech Wisconsin pays the same tariffed rates as its competitors for the intrastate tariffed services involved in this proceeding it is in compliance with this requirement. Section 276 also prohibits LECs from subsidizing their payphone operations from exchange or exchange access services. Since revenues from coin access lines (the so-called "smart lines" used in the provision of Ameritech Wisconsin's payphone services) exceed costs there is no such subsidy of Ameritech Wisconsin's payphone operations.¹⁴

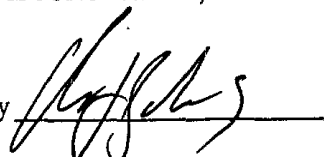
CONCLUSION

Ameritech Wisconsin's payphone service rates are non-discriminatory, recover their direct costs and satisfy the Commission's new services test. Assuming the Commission can lawfully prescribe rates for these intrastate services -- which Ameritech Wisconsin denies -- there is no reason disturb the existing rates.

¹⁴ On May 19, 1997 Ameritech Wisconsin submitted a "new services test" cost filing for payphone services to the Wisconsin Public Service Commission. The Wisconsin PSC subsequently acknowledged jurisdiction to enforce "a prohibition on cross subsidy . . . and prohibitions on discriminatory practices." (*WPSC Letter Order*, Docket No. 05-TI-156, November 6, 1997, Exhibit "A" to Application for Review). Any subsidy or discrimination issues should be referred to that body for resolution and there is no basis, even under the mistaken theories espoused in the March 2, Order, for the Commission to assert jurisdiction in these areas.

Respectfully submitted,

WISCONSIN BELL, INC.

By 

Charles J. Schamberg
Roger K. Toppins
Alfred G. Richter, Jr.
1401 I Street N.W., 11th Floor
Washington, D.C. 20005
202-326-8893

August 14, 2000

Its Attorneys

Ameritech - Wisconsin-#CCB/CPD00-1

Local Usage

2001 Study

Cover Page

Ameritech - Wisconsin-#CCB/CPD00-1

Usage, per Local Minute

(also referred to herein as Local Usage)

Study Year 2001

Wisc_Local Usage1

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Local Usage
2001 Study

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Wisc_Local Usage

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Local Usage
2001 Study

Overview

Study Purpose	The purpose of this study is to comply with the Federal Communications Commission's payphone order requiring a new service test: Wisconsin Public Service Commission Order Directing Filings. CCB/CPD Docket 00-1 released March 2, 2000. ("Wisconsin Order").
Service Description	This study identifies the cost of a local message for the Business, Residence and Independent Payphone Provider (IPP).
Study Methodology	The local message cost was developed using the Network Usage Cost Analysis Tool (NUCAT) model.
Assumptions	The following assumptions were used in developing this cost analysis: 12.19% Cost Of Money, 2001 Annual Charge Factors, Labor Rates and Investments.

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Local Usage
2001 Study

TIC Test

This Tab Does Not Apply

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Summary of Wisconsin Usage Related Costs of Local Service	
Call Plan	Cost
Residence Message Rate	Per Message
Business & IPP Message Rate	Per Message

[Tab 3.0b](#)

[Tab 3.0c](#)

[Return to Flow Chart](#)

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W. Scott Randolph
Director - Regulatory Matters



The Verizon logo, consisting of a checkmark symbol above the word "verizon" in a bold, lowercase sans-serif font.

Verizon Communications
1850 M Street, NW
Suite 1200
Washington, DC 20036

Phone: 202 463-5293
Fax: 202 463-5239
srandolph@verizon.com

September 20, 2000

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: In the Matter of the Wisconsin Public Service Commission, Order Directing Filings,
CCB/CPD No. 00-1, Request for Confidential Treatment of Cost Support Data
Provided by Verizon North, Inc.

Dear Ms. Salas,

Verizon North, Inc. (formerly GTE North Incorporated) makes this submission in compliance with the Order (DA 00-347) of the Common Carrier Bureau released March 2, 2000 in this proceeding. On August 14, 2000, Verizon North submitted certain cost data demonstrating that its currently effective intrastate rates for payphone services satisfy the new services test. This filing provides additional cost data in support of the \$2.50 usage cost component shown on Schedule 3-3 of the original filing.

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, Verizon requests that the material it has submitted as confidential be afforded confidential treatment under the Commission's Rules and not be made available for inspection without a nondisclosure agreement, for those reasons stated in Verizon's original August 14, 2000 filing.

If there are any questions regarding this filing, please contact me at 202-463-5293.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Scott Randolph".

W. Scott Randolph
Director - Regulatory Matters

c: Competitive Pricing Division - Room 5-A207
ITS (letter only)

LEGEND

TYPES OF CALLS

- 1 - Intraoffice / Intraexchange (Base Unit)
- 2 - Interoffice w/ Tandem Trunking (Base Units)
- 3 - Interoffice w/ Tandem Trunking (With Remotes)
- 4 - Interoffice w/ Direct Trunking (Base Units)
- 5 - Intraoffice / Intraexchange (Remote Unit)
- 6 - Interoffice w/ Direct Trunking (With Remotes)

CONFIDENTIAL

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PEAK
GTE - GTE
BXF UNITS - PER CALL OR MINUTE

Intraoffice Switching - Call Setup
Intraoffice Switching - Minute of Use
Interoffice Switching - Outgoing Call Setup
Interoffice Switching - Outgoing MOU
Interoffice Switching - Incoming Call Setup
Interoffice Switching - Incoming MOU
Interoffice Switching - Tandem Call Setup
Interoffice Switching - Tandem MOU
Measurement
Switched Transport Termination per MOU per End
Switched Transport Termination per Setup per End
Switched Transport Facility per MOU per Minute
Switched Transport Facility per Setup per Minute

BNF COSTS - PER CALL OR MINUTE

Intraoffice Switching - Call Setup
Intraoffice Switching - Minute of Use
Interoffice Switching - Outgoing Call Setup
Interoffice Switching - Outgoing MOU
Interoffice Switching - Incoming Call Setup
Interoffice Switching - Incoming MOU
Interoffice Switching - Tandem Call Setup
Interoffice Switching - Tandem MOU
Measurement
Switched Transport Termination per MOU per End
Switched Transport Termination per Setup per End
Switched Transport Facility per MOU per Minute
Switched Transport Facility per Setup per Minute

SETUP / DURATION SUMMARY

SWITCHING - SETUP
TRANSPORT - SETUP
TRANSPORT - DURATION
MEASUREMENT

NETWORK TOPOLOGY - % OCCURRENCE

GTE - GTE
SWITCHING - SETUP
TRANSPORT - SETUP
TRANSPORT - DURATION
MEASUREMENT

TYPE OF CALLS

1 2 3 4 5 6

CONFIDENTIAL

**PEAK
GTE - BELL / INDEPENDENT (ORP)**

BWF UNITS - PER CALL OR MINUTE

1 2 TYPE OF CALLS 3 4 5 6

Intraoffice Switching - Call Setup
Intraoffice Switching - Minute of Use
Interoffice Switching - Outgoing Call Setup
Interoffice Switching - Outgoing MOU
Interoffice Switching - Incoming Call Setup
Interoffice Switching - Incoming MOU
Interoffice Switching - Tandem Call Setup
Interoffice Switching - Tandem MOU
Measurement

Switched Transport Termination per MOU per End
Switched Transport Termination per Setup per End
Switched Transport Facility per MOU per Minute
Switched Transport Facility per Setup per Minute

BWF COSTS - PER CALL OR MINUTE

1 2 3 4 5 6

Intraoffice Switching - Call Setup
Intraoffice Switching - Minute of Use
Interoffice Switching - Outgoing Call Setup
Interoffice Switching - Outgoing MOU
Interoffice Switching - Incoming Call Setup
Interoffice Switching - Incoming MOU
Interoffice Switching - Tandem Call Setup
Interoffice Switching - Tandem MOU
Measurement

Switched Transport Termination per MOU per End
Switched Transport Termination per Setup per End
Switched Transport Facility per MOU per Minute
Switched Transport Facility per Setup per Minute

SETUP / DURATION SUMMARY

SWITCHING - SETUP
SWITCHING - DURATION
TRANSPORT - SETUP
TRANSPORT - DURATION
MEASUREMENT

NETWORK TOPOLOGY - % OCCURRENCE

GTE - BELL / INDEPENDENT
SWITCHING - SETUP
SWITCHING - DURATION
TRANSPORT - SETUP
TRANSPORT - DURATION
MEASUREMENT

CONFIDENTIAL

PEAK
COST SUMMARY GTE-BELL/INDEPENDENT

SETUP
DURATION
INCLUDES SETTLEMENT COSTS

TSLRC
0.0063406
0.0019957

MONTHLY UNITS G-B
R-1

B-1

PBX CENTRANET

SETUP
DURATION

MONTHLY COSTS G-B

R-1

B-1

PBX CENTRANET

SETUP
DURATION

TOTAL

PEAK	GRAND TOTAL MONTHLY COST (GG+GB)	R-1	B-1	PBX CENTRANET
TOTAL				

GTE - GTE
 OFF-PEAK
 BNF UNITS - PER CALL OR MINUTE

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2 TYPE OF CALLS

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BNF COSTS - PER CALL OR MINUTE

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SETUP / DURATION SUMMARY

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CONFIDENTIAL

OFF PEAK			
COST SUMMARY GTE - GTE			TS/LNC
SETUP			
DURATION			
MONTHLY UNITS G-G	R-1	B-1	PBX CENTRANET
SETUP			
DURATION			
MONTHLY COSTS G-G	R-1	B-1	PBX CENTRANET
SETUP			
DURATION			
TOTAL			

CONFIDENTIAL

CONFIDENTIAL

GTE - BELL / INDEPENDENT (ORF)
OFF-PEAK
BNF UNITS - PER CALL OR MINUTE

1 TYPE OF CALLS 2 3 4 5 6

Intraoffice Switching - Call Setup
Intraoffice Switching - Minute of Use
Interoffice Switching - Outgoing Call Setup
Interoffice Switching - Outgoing MOU
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Switched Transport Facility per Setup per Minute

BNF COSTS - PER CALL OR MINUTE

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Switched Transport Facility per Setup per Minute

SETUP / DURATION SUMMARY

SWITCHING - SETUP
SWITCHING - DURATION
TRANSPORT - SETUP
TRANSPORT - DURATION
MEASUREMENT

NETWORK TOPOLOGY - % OCCURRENCE

GTE - BELL / INDEPENDENT
SWITCHING - SETUP
SWITCHING - DURATION
TRANSPORT - SETUP
TRANSPORT - DURATION
MEASUREMENT

CONFIDENTIAL

OFF PEAK
 COST SUMMARY GTE - BELL / INDEPENDENT

TSLRG

SETUP DURATION	INCLUDES SETTLEMENT COSTS		
MONTHLY UNITS G-B	R-1	B-1	PBX CENTRAMEI
SETUP DURATION			
MONTHLY COSTS G-B	R-1	B-1	PBX CENTRAMEI
SETUP DURATION			
TOTAL			

OFF PEAK GRAND TOTAL MONTHLY COST (GG+GB)	B-1	PBX	CENTRAMEI
TOTAL			

TOTAL LOCAL USAGE COST - PER MONTH				
PEAK	Rd	Bd	FDX	CENTRANET
OFF PEAK				
TOTAL				