

Confidential Release

Case Number:

93-487-TP-ALT

93-576-TP-CSS

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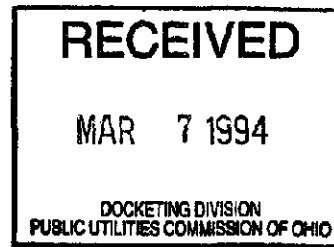
Today's Date:

July 31, 2009

Motion

The Ohio Bell Telephone Company

Suite 18V
150 East Gay Street
Columbus, Ohio 43215
(614) 223-7928



Jon F. Kelly
Senior Attorney

March 7, 1994

Daisy Crockron, Chief
Docketing Division
Public Utilities Commission of Ohio
180 E. Broad St., 10th Floor
Columbus, Ohio 43266-0573

Re: The Ohio Bell Telephone Company (Ameritech Ohio)
Case No. 93-487-TP-ALT
Case No. 93-576-TP-CSS

NON-PUBLIC FILING

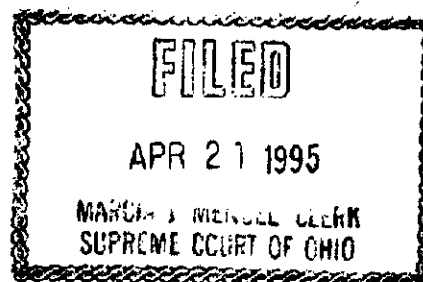
Dear Ms. Crockron:

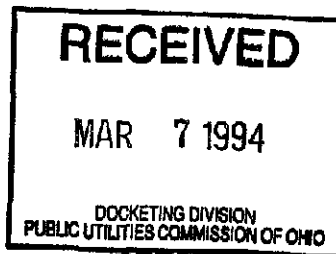
Submitted herewith is the non-public version of Ameritech Ohio's motion for a protective order regarding information contained in the Staff's document and workpapers. The public version of this motion is being submitted today for regular filing.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jon F. Kelly", with a stylized flourish at the end.

Enclosure





ORIGINAL

NON-PUBLIC VERSION

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.)	

AMERITECH OHIO'S MOTION FOR PROTECTIVE ORDER
REGARDING INFORMATION CONTAINED IN THE
STAFF'S SUPPORTING DOCUMENT AND WORKPAPERS

Now comes Ameritech Ohio¹, pursuant to the Entry of the Attorney Examiner dated February 23, 1994 and Ohio Admin. Code §4901-1-24, and respectfully moves this Honorable Commission for a protective order keeping confidential the designated proprietary information contained in the Staff's Supporting Document, the NRRI Report Addendum (collectively, "Staff Report") and Staff workpapers (also referred to as source documents), as detailed in the attached Memorandum in Support, which is incorporated herein by reference.

¹ Ameritech Ohio refers to The Ohio Bell Telephone Company, the Applicant herein.

Specifically, Ameritech Ohio requests the Commission order that the documents designated as proprietary (along with any and all copies, including electronic copies) be protected from disclosure consistent with their competitive value. Therefore, the Company seeks to protect some proprietary documents only from disclosure to the general public. However, for other highly competitively sensitive documents, the Company seeks to prevent any disclosure to the competitor intervenors² in this proceeding as well as the general public. The Company respectfully requests that the Commission adopt language for its order which the Company has adapted from the Commission's Protective Order in In re: General Telephone Company, Case No. 81-383-TP-AIR, issued February 17, 1982:

- 1) The protected material may be used only for purposes of this proceeding and may not be disclosed to any persons other than counsel to a party to this proceeding or without the express consent of the Applicant and/or any other party deeming the information to be proprietary or upon direction of the Commission or its Attorney Examiner. In no event shall disclosure be made to any employee, officer, director, or principal stockholder of any party without a direct and specific need to have access to such information arising out of this proceeding.
- 2) All hearings in this proceeding will be open to the public unless the Attorney Examiner or the Commission determines that the confidentiality of protected material or other confidential, proprietary or trade secret information which

² For the purposes of this motion, the following intervenors are considered competitors: OCTVA, AT&T Communications of Ohio, Inc., Enhanced Telemanagement, Inc., MCI Telecommunications Corporation, IXC Coalition, Sprint Communications Company, Time Warner AxS, Cablevision Lightpath, Inc. and New Par Companies.

might be orally disclosed at a public hearing cannot be otherwise adequately protected.

- 3) All persons that may be entitled to receive, or who are afforded access to the protected material by reason of this order, shall neither use or disclose the protected material for any purpose other than the purposes of preparation for and conduct of this proceeding or any administrative or judicial review hereof and then only as contemplated herein, and shall keep the protected material secure in accordance with the purposes and intent of this order.
- 4) No copies of the protected material may be made except by the party furnishing the material. A sufficient supply of numbered copies will be made for use in this proceeding.
- 5) Certain protected material has been designated for disclosure pursuant to the provisions of this order only to intervenors who are not competitors or potential competitors of the Applicant. Neither competitor-intervenors, nor their attorneys shall have access to this material. With regard to this paragraph the following intervenors are deemed to be competitors of the Applicant: OCTVA, AT&T Communications of Ohio, Inc., Enhanced Telemanagement, Inc., MCI Telecommunications Corporation, IXC Coalition, Sprint Communications Company, Time Warner AxS, Cablevision Lightpath, Inc. and New Par Companies.
- 6) Prior to giving access to protected material as contemplated in this order to any person authorized to be given access pursuant to this order, counsel for the party upon whose behalf the person is receiving such protected material shall deliver a copy of this order to such person, and prior to obtaining access, such person shall execute a written acknowledgement identifying the name, address and employment of such person, and stating that this order has been read, is understood, and will be complied with.

Consistent with the Attorney Examiner's Entry, excerpts from the Staff Report with confidential portions marked which are the subject of this motion are being provided with this motion. A public version of this motion is being filed in the public docket with the Staff Report excerpts redacted. It is the Company's understanding that counsel are bound to treat the excerpts being provided to them in the same manner as the Staff Report that has been provided to them. Sets of the Staff's source documents (or exemplars thereof), which include both Company-supplied and Staff-generated materials, have been provided to the Staff and the Attorney Examiners.

Respectfully submitted,

AMERITECH OHIO

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MEMORANDUM IN SUPPORT

I. General Discussion of the Applicable Law

Ameritech Ohio requests that the materials and data specified in this memorandum (along with any and all copies, including electronic copies) be kept confidential by order of this Commission consistent with their proprietary trade secret nature. While the Commission has often expressed its preference for open proceedings, the Commission also long ago recognized its statutory obligations with regard to trade secrets:

The Commission is of the opinion that the "public records" statute must also be read in pari materia with Section 1333.31, Revised Code ("trade secrets" statute). The latter statute must be interpreted as evincing the recognition, on the part of the General Assembly, of the value of trade secret information.

In re: General Telephone Co., Case No. 81-383-TP-AIR (Entry, February 17, 1982). Likewise, the Commission has facilitated the protection of trade secrets in its rules (Ohio Admin. Code §4901-1-24(A)(7)). The question presented in this motion is not whether trade secrets are appropriate for Commission protection, but rather whether the specific information which is the subject of this motion is proprietary and, therefore, entitled to such protection.

The definition of a "trade secret" is statutorily provided:

"Trade secret" means the whole or any portion or phase of any scientific or technical

information, design, process, procedure, formula or improvement, or any business plans, financial information . . . which has not been published or disseminated, or otherwise become a matter of general public knowledge.

Ohio Rev. Code §1333.51(A)(3).¹ This definition clearly reflects the state policy favoring the protection of trade secrets such as Ameritech Ohio's technical network information and deployment plans, its marketing plans, competitive revenue projections and cost studies. Courts of other jurisdictions have held that not only does a public utilities commission have the authority to protect the trade secrets of a public utility, the trade secret statute creates a duty to protect them. New York Tel. Co. v. Pub. Serv. Comm. N.Y., 56 N.Y. 2d 213 (1982). Indeed, for the Commission to do otherwise would be to negate the protections the Ohio General Assembly has granted to all businesses, including public utilities, through Ohio Rev. Code §1333.51(A)(3). Of course, this Commission has previously carried out its obligations in numerous Commission proceedings. See, e.g., Elyria Tel. Co., Case No. 89-965-TP-AEC (Finding and Order, September 21, 1989); Ohio Bell Tel. Co., Case No. 89-718-TP-ATA (Finding and Order, May 31, 1989); Columbia Gas of Ohio, Inc., Case No. 90-17-GA-GCR (Entry, August 17, 1990).

¹ It should be noted that the Ohio Trade Secrets law will likely be amended in the near future. A bill adopting the Uniform Trade Secrets Act, Am. Sub. H. B. 320, has passed both houses of the General Assembly. The bill will strengthen Ohio's trade secrets law, underscoring the state's important public policy that trade secrets, such as those that are the subject of this motion, be protected from disclosure.

The Trade Secret statute likewise provides the standard by which the specified materials and information are to be judged:

Such . . . [information] . . . is presumed to be secret when the owner thereof takes measures designed to prevent it, in the ordinary course of business, from being available to persons other than those selected by the owner to have access thereto for limited purposes.

(Id.). In Pyromatics, Inc. v. Petruziello, 7 Ohio App. 3d 131, 134-135, (Cuyahoga County, 1983), the Court of Appeals, citing Koch Engineering Co. v. Faulconer, 210 U.S.P.Q. 854, 861 (Kansas 1980), has delineated factors to be considered in recognizing a trade secret:

(1) The extent to which the information is known outside the business, (2) the extent to which it is known to those inside the business, i.e., by the employees, (3) the precautions taken by the holder of the trade secret to guard the secrecy of the information, (4) the savings effected and the value to the holder in having the information as against competitors, (5) the amount of effort or money expended in obtaining and developing the information, and (6) the amount of time and expense it would take for others to acquire and duplicate the information.

For each of the specific documents discussed below, Ameritech Ohio considers and has treated the information as trade secrets. For the purposes of this proceeding the Company requests two levels of protection. For documents which are not highly competitively sensitive, the Company is requesting a protective order which prohibits disclosure outside the context

of this proceeding. For those documents which are highly competitively sensitive, the Company requests that only those intervenors who are not competitors of Ameritech Ohio be permitted to have access. This "two level" approach is consistent with the protective agreements that are presently in place for the discovery phase of this proceeding. This arrangement was made in recognition of the fact that it is simply not possible to provide sensitive marketing and cost information to a competitor and then require that the competitor "forget" what was learned pursuant to a protective agreement or order. In good faith it simply cannot be done.

The specific Staff Report and NRRI report passages and Staff workpapers and supporting documents for which protection is requested are specifically discussed in the following section. For clarity, the Company's specific requests have been organized into four categories: (1) revenue/marketing and technological deployment documents and data; (2) cost studies; (3) Ameritech Publishing, Inc. documents and data; and (4) IRS Form 1120 information. In the first two categories, information which is highly competitively sensitive is specifically designated.

II. Specific Protection Requests

A. Revenue/Marketing and Technological Deployment Documents and Data

Of great concern to Ameritech Ohio is the public disclosure of its marketing plans to competitors. Plainly, such

marketing plans fall within the statutory trade secret category, "business plans." It is axiomatic that a competitor will be advantaged if it is provided with the marketing intelligence of another competitor. Therefore, the Company is seeking protection of certain specific marketing/revenue data. It is also seeking protection of certain technological deployment plans from which marketing strategies and plans may be discernible. This information describes specific central office locations and the exact features and capabilities of that office. This technological information is considered to be a trade secret. For example, competitors of Ameritech Ohio could use this information in planning their deployment and marketing efforts based on Ameritech Ohio's capabilities in a particular area. In the ordinary course of business of Ameritech Ohio, these documents are stamped confidential, are treated as proprietary and confidential by Ameritech Ohio employees, and are not disclosed to anyone outside the Company except under lawful authority.

This and/or similar material has been provided pursuant to protective agreement to intervenors during the course of discovery. The Company seeks to have this arrangement continued as to the following documents and materials:

Staff Document Room:

1. CLASS Services Revenue Adjustment Spreadsheet

HIGHLY COMPETITIVELY SENSITIVE

This report, prepared by the Staff from Company-provided data, shows specific monthly and annualized revenue data for CLASS services, specific to each service, including penetration data.

2. Advanced Custom Calling Sales Report, Period of 7/1/93 - 9/30/93 (Dated 11/93)

HIGHLY COMPETITIVELY SENSITIVE

This report shows inward and outward movement, market penetration and potential market for various Advanced Custom Calling Services, including Caller ID, Automatic Callback, Call Trace, Distinctive Ringing, etc.

3. Response to Staff Data Request 54, ASI Work Profiles - 1992

HIGHLY COMPETITIVELY SENSITIVE

These documents consist of several hundred pages of business processes, the employees associated with each, a categorization of the benefits to the Company to be derived from each, tracking expectations and methodologies and marketing and financial data. Each page contains one or more of these items of information, which are frequently interrelated. Included are numerous specifics of marketing plans, including cost and pricing information, deployment strategies and schedules, and new product information and specifications. Individually and collectively, they reveal business plans that would be of value to competitors.

4. Response to Staff Data Request 14, Attachments 2, 3, and 4

Attachment 2 identifies specific digital and analog switches, their location, capabilities and upgrades needed. Attachment 3 identifies the location of the specific central office locations where fiber is currently to be deployed.

Attachment 4 is a list of central offices where fiber will be deployed as part of Advantage Ohio.

Attachment 2 could be released with the minor modification of masking the specific switch locations. Attachment 2 was also included in the NRRI report (see Item 7 below).

Attachments 3 and 4 contain only the central office location code, thus making masking of the confidential information impossible. The Commission Staff and NRRI did not mention this data in their reports.

5. Document entitled: "The Ohio Bell Telephone Company Total Company Regulated Revenues" (13 pages) and associated spreadsheet printout

This document was prepared internally and consists of five year revenue projections for various services. These workpapers support the revenue projections contained in Exhibit H and referred to by Company witness Kukla in his Additional testimony filed on August 16, 1993. The projections contain assumptions about the level and extent of competition during the five year forecast period, spending and pricing during that period, and other business economic data.

Disclosure of the data, even in the form of assumptions and five year projections, would be of business value to competitors. However, since it underlies a filed exhibit and contains projections as contrasted with actual discrete data, Ameritech Ohio is willing to reveal the workpapers under protective order to all intervenors, including those who are competitors.

6. AT&T Network Systems Invoices and Support Papers

The Staff's plant inspection workpapers include invoices and supporting documents for AT&T digital switches, showing switch and feature prices. These invoice prices include customer-specific discounts, which are confidential terms of the vendor-customer relationship. The Company requests that the prices shown on the invoices and supporting documents be redacted.

NRRI Report:

7. Listings of Digital and Analog switches by switch type showing current capabilities and upgrade requirements, pp. 350-358

This is the same information as that described in Item 4 above, Attachment 2. The Company proposes that lists only be released if the central office designations (far left column) are redacted.

B. Cost Studies

Cost studies have historically been protected by the Commission due to their extremely sensitive nature. The Commission has uniformly treated cost studies and analyses as proprietary. For example, in the Centrex arena, cost studies and analyses filed in Case No. 89-720-TP-AEC and subsequent orders have all been treated as proprietary and confidential. In this context, this information has not been made available to competitors. The same rationale is applicable here. A competitor with knowledge of another's costs can readily discern where it has a competitive cost advantage. Marketing strategy can be focused with virtually absolute precision.

These cost studies supplied to the Staff, and addressed by Dr. Currie in his filed testimony (Ohio Bell Ex. 28.0), contain information that is clearly of value to competitors because they identify Ameritech Ohio's costs of doing business for services that are part of the current and evolving competitive marketplace. In the ordinary course of business of Ameritech Ohio, these studies are stored in locked file cabinets

located in Cleveland, are stamped confidential, are treated as proprietary and confidential by Ameritech Ohio employees, and are not disclosed to anyone outside the context of a Commission proceeding and/or staff data request, where they are disclosed to the Staff. During the course of discovery, access to these studies has been provided only pursuant to protective agreement to non-competitor intervenors.

Dr. Currie's schedules attached to his testimony (Attachments 28.3-28.10) consistently utilize the word "proprietary" where numbers would otherwise appear. No cost numbers appear in the record of this case. Only the Staff and parties to this case which are not competitors of Ameritech Ohio, such as the Office of the Consumers' Counsel, who have signed appropriate protective agreements, have seen the numbers.

It is particularly important that competitors of Ameritech Ohio not have access to cost data. The very purpose of trade secret protection is to provide security for businesses that develop information at great trouble and expense so that competitors cannot get that information and unfairly compete. Ameritech Ohio will, however, as it has already agreed to do with Time Warner AxS, provide a cost study using surrogate numbers for intervenors who wish to understand the company's methodology. That procedure would enable these intervenors to better prepare their testimony and for cross-examination.

The staff also cited and utilized toll rate restructure cost and revenue information from Ameritech Ohio's toll filing designated on the docket of this Commission as Case No. 93-353-TP-ATA. Information utilized by the staff consists of primary and secondary carrier expenses associated with the toll restructuring proposal and a revenue/payment analysis with imputation. While the text of the staff report itself does not directly discuss this information, it is incorporated by reference, consists of proprietary documents, and should be protected.

Therefore, the Company is seeking to have its cost studies protected upon the same basis as it has requested for its marketing-related data discussed above. As with the highly competitively sensitive marketing data identified on page 6, the Company is requesting that competitor-intervenors be precluded from having access to the following Company cost studies:

Staff Document Room:

8. Folder labeled "Exchange Access Disaggregation Revenue v. Cost" containing the following:

HIGHLY COMPETITIVELY SENSITIVE

- (A) Single Loop Cost - All areas (Complete Document)
- (B) File OBTREVEU Printout (1 page)
- (C) Staff WP OBT S & E Costs (1 page)
- (D) File OBT RTCT Printout (2 pages)
- (E) 1993 Loop Cost Study, Vol. 64-2042, Book 1 of 1, Executive Summary and including 21 boxes of material on Company premises

- (F) 1993 Service & Establishment Nonrecurring Cost Study (excluding tariff pages)
- (G) Central Office Line Termination Cost Study

9. Toll Rate Restructure Cost and Revenue Information, Case No. 93-353-TP-ATA

HIGHLY COMPETITIVELY SENSITIVE

Cost and revenue information, and primary and secondary carrier expense information associated with the toll rate restructuring.

10. Response/Workpapers for Staff Data Request No. 5, Question 4(J)

HIGHLY COMPETITIVELY SENSITIVE

These documents contain specific references to the cost for provisioning ISDN services in a digital switch. The number shown in the response to the Staff data request relates to a request for proposal and subsequent contracts between Ameritech and several vendors. The prices contained in those contracts are considered highly proprietary to both Ameritech and the switch manufacturers. This information has not been disclosed to the public. Disclosure could result in revealing information concerning the marketing and price of switch manufacturers. In addition, the cost information is considered highly confidential from a competitive standpoint. Disclosure could cause competitive harm. Competitors planning on offering ISDN service in the future could use the cost data as an element in establishing their own ISDN pricing. The same information is revealed in the NRRI report (see item 12 below).

11. Fully Distributed Cost Study

This document details a study which allocates Ameritech Ohio's intrastate costs, as identified by Mr. Kukla, in six cost groups, and identifies corresponding revenues for each group. Ameritech Ohio is willing to permit competitor-intervenors to have access to this document pursuant to a protective agreement.

NRRI Report:

12. Reference to Cost of ISDN Provisioning, page 242

HIGHLY COMPETITIVELY SENSITIVE

Same rationale as Item 10 above.

C. Ameritech Publishing Information

Ameritech Publishing, Inc. ("API") is a privately-owned, non-regulated affiliate of Ameritech Ohio. No product or service it offers is the subject of this proceeding. Because certain contractual payments made to Ameritech Ohio by API were examined by the Staff, certain data associated with API was collected and the value of those contract payments was disclosed in the Staff Report. As these payments are the subject of a private contract between Ameritech Ohio and Ameritech Publishing, it is the position of the Company that neither the magnitude nor the circumstances of such payments should be publicly disclosed. This is financial information which is contemplated by the statute. Additionally, portions of this information relates to other Ameritech Operating Companies ("AOCs") which was not in the possession of Ameritech Ohio at the time of the Staff's request. Ameritech Ohio obtained this trade secret information from the other AOCs and from API in order to cooperate with the Staff.

In the ordinary course of business of Ameritech Ohio this information is stamped confidential, is treated as proprietary and confidential by Ameritech Ohio employees, and is

not disclosed to anyone except in a Commission proceeding and/or pursuant to staff data request. During the course of discovery, this information has been provided only pursuant to protective agreement.

Therefore, the Company requests that documents and information contained in the Staff Report relating to API be afforded protection as a trade secret and disclosed only to intervenors subject to protective order.

Staff Document Room:

13. Responses to Staff Data Requests 20 and 22.

These responses were combined, and consist of the following:

- (A) Publishing service contracts between API and Ameritech Ohio (dated 12-23-83 and 1-1-91), which display trade secret financial information;
- (B) The response to Staff Data Request 20, Question 5, which reveals API return on equity amounts;
- (C) Question 6 of Staff Data Request 20, which reveals a confidential Ameritech Ohio - API contract term;
- (D) Excerpts from the audit reports provided in response to Staff Data Request 20, Question 8, which includes confidential API financial information;
- (E) The response to Staff Data Request 22, item API-3, consisting of API's chart of accounts, which includes specific references to products and marketing projects;
- (F) The response to Staff Data Request 22, item API-4, consisting of API's audited financial statements for 1988 through 1991, together with auditors' reports;
- (G) The response to Staff Data Request 22, item API-16, consisting of API's net payments to Ameritech Ohio;

- (H) The response to Staff Data Request 22, item API-10, detailing yellow pages profit information;
- (I) A Staff work paper supporting the Staff recommendation concerning directory revenues with specific financial information;
- (J) Monthly Ledger - Journal Entry detail, detailing API financial information for three months.

14. Response to Staff Data Request 36, Question 4.

This response reveals the per line payments made by API to Ameritech Ohio and the other Ameritech Operating Companies. This is a matter of private contract between API and the AOCs.

15. Response to Staff Data Request 40.

This includes API payment and revenue information and this represents the billing information of a nonregulated company. This data is analogous to the customer billing data of IXC's.

Staff Report:

- 16. "Directory Advertising Revenues", Second Paragraph, Page 15
- 17. "Staff Adjustments", Second Paragraph, Page 125
- 18. Schedule C-3.3, Page 193

It is requested that the numbers at each of the foregoing references be redacted.

D. IRS Form 1120, Schedule E

The Staff's workpapers include copies of the Company's 1991 and 1992 federal income tax returns on Form 1120. Schedule E of those returns is a detail of officer compensation, identifying officers by name and Social Security number. The Company requests that, consistent with the Commission's past practice, the Commission maintain the confidentiality of the

officers' compensation by directing the redaction of the names and Social Security numbers from the Schedules. The level of compensation of Company officers, as reported on these Schedules, is a private matter between the officers and the Company.

Staff Document Room:

19. IRS Form 1120, Schedule E.

III. Conclusion

In conclusion, the Company requests that a protective order be granted to protect the confidentiality of the documents and information described herein.

Respectfully submitted,

AMERITECH OHIO

By: Michael T. Mulcahy /JFK
Michael T. Mulcahy (Trial Attorney)

Jon F. Kelly
Charles S. Rawlings
William H. Hunt

Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon counsel for parties as shown on the attached service list by hand delivery or prepaid overnight express delivery this 7th day of March, 1994.

Jon F. Kelly
Jon F. Kelly

Advanced Custom Calling or CLASS Services annualizing the actual sales for the month of September 1993. No service repricing adjustment to the current adjusted revenues for Toll Rate Restructure was made by the Staff since the restructured rates did not go into effect prior to September 30, 1993. The Staff's adjustment is shown on Schedule 3.2.

Billing and Collection

The Applicant excluded revenues and expenses associated with intrastate billing and collection from its entire base year operating revenues and expenses. The Applicant's adjustment is summarized on Exhibit 93C-3.12. The Applicant categorized this adjustment as a Regulatory adjustment.

The Staff agrees with the Applicant's adjustment. The Staff was not able to include its adjustment on Schedule 3 or create a supporting Schedules 3 to detail its adjustment because of the unique way that the Applicant presented its adjustment. The Staff's adjustment is shown on Schedule C-2.

Directory Advertising Revenues

The Applicant eliminated all of the jurisdictional revenues associated with Ameritech Publishing Incorporated (API) payments and associated expenses. The Applicant's proposed adjustment is summarized on Exhibit 93C-3.13. The Applicant categorized this adjustment as a Regulatory adjustment.

The Staff disagrees with the Applicant's proposed adjustment. The Staff included all directory advertising revenues and adjusted these revenues to reflect a more compensatory rate per access line. The Staff recommends that the test period revenues collected from API be increased from the current rate of \$35.73 per access line to \$48.59 per access line. The Staff's adjustment is shown on Schedule C-3.3.

Uncollectible Revenues

The Applicant adjusted nine months of its uncollectible revenues to reflect the effects of the above discussed View adjustments.

The Staff adjusted the test period to reflect the effects of its revenue adjustments. The Staff's adjustment is shown on Schedule C-3.4.

Wages

The Applicant adjusted its 1993 ACV wages by annualizing to an estimated average of 1993 management and non-management employees, using a

money, and, in absolute terms, it is. However, in financial terms, relative to the Applicant's size, asset base, and cash flow, the investment program is not large.

STAFF PERSPECTIVE ON THE PLAN'S FINANCIAL IMPLICATIONS

Staff Adjustments

As presented in the Operating Income and Rate Base chapter of the Report, the Staff disagrees with the Applicant's addition of FAS 106 expenses and balances to the Total Company Regulated accounts. Accordingly, the amounts of FAS 106 amortization shown on column (c) of WPH-2 were removed from the expense file in the Staff's model. Since the 1994 expenses are escalated each year by the expense growth vector shown in WPH-2.2, this removal has the effect of reducing expenses by an increasing amount over the projection period. Although WPH-3.6b shows a constant level of FAS 106 amortization, the Staff's treatment is consistent with the way the amortization was, in fact, modeled by OBT, since all expenses were escalated. In addition, the Applicant's FAS 106 adjustment to Regulated Stockholder's Equity was reversed, in a manner consistent with the calculations used by OBT on WPH-3.7.

As shown on WPH-2, the Applicant has removed approximately \$87 million of API revenues in deriving the amount of Regulated Total Company revenues. As presented in the Operating Income and Rate Base chapter of the Report, the Staff disagrees both with the exclusion and the amount involved. The Staff analysis indicates that \$116 million of API revenues should be included in Total Company Regulated revenues. Accordingly, this amount was entered into the Staff's financial model as revenues on an annual basis over the projection period, and the API expenses, which had also been excluded, were entered into the model's expense file. Additionally, the \$23 million of API retained earnings, shown on WPH-3.7, were added back into Regulated Stockholders' Equity.

With these changes, the financial projections were modeled in four slightly varying ways:

- a. with the payout ratio set to 95%, as in the Applicant's projection;
- b. with the dollar amount of dividends set equal to the amount in the Applicant's projections;
- c. with the dollar amount of dividends set equal to an amount that was 100% of the net income projected under the Applicant's revenues and expenses;

SCHEDULE C-3.3

THE OHIO BELL TELEPHONE COMPANY
Case No. 93-487-TP-ALT
Directory Advertising Revenue Adjustment
(000's Omitted)

(1) Number of Access Lines (a)	2,396
(2) Staff's Adjusted Access Line Rate (b)	<u>\$ 48.59</u>
(3) Staff's Adjusted Directory Revenues (1) x (2)	116,422
(4) Test Year Directory Revenue (c)	<u>85,598</u>
(5) Adjustment (3) - (4)	<u><u>\$ 30,824</u></u>

- (a) Applicant's Exhibit 93C-3.13 and Staff's Data Request 20 (\$85,598 + \$35.73)
(b) Refer to Text
(c) Applicant's Exhibit 93C-3.13

j. What is the cost per switch and per access line of making ISDN available?

As stated in Ms. Kleis' testimony Ameritech Services, on behalf of Ohio Bell, sent out an RFP to switch vendors to modernize central offices to meet required dialing formats. Included in the RFP was the request for the switch vendors to provide prices for ISDN capabilities. As a result of the RFP the average per line cost for provisioning ISDN services in a digital switch is \$300 per line.

k. Assuming Ohio Bell's alternative regulation plan were not approved, please provide a table showing the numbers and percentages of local switches and access lines with access to ISDN in the years 1994 through 2000.

Unknown, without Advantage Ohio there would be no commitment to deploy ISDN by any specific time frame. Any plan would be subject to change.

l. What is the dollar amount of Ohio Bell's proposed annual investment in ISDN, assuming the alternative regulation plan is approved, for each year from 1991 through 2000?

The estimated cost to deploy ISDN in each of the years 1994 through 1998 is as follows:

1994	4.4 million
1995	5.8 million
1996	7.2 million
1997	12.0 million
1998	19.7 million

Ohio Bell is not making any commitment for ISDN deployment beyond 5 years of the effective date of Advantage Ohio.

Assuming it is not approved?

Unknown, without Advantage Ohio there would be no commitment to deploy ISDN by any specific time frame. Any plan would be subject to change.

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
AKRNOH2525F	43532	NT	Y	Y	N			H&S
AKRNOH7272C	16970	NT	N	N	N	H&S	H&S	H&S
ALNCOH8282A	16351	NT	N	N	N	H&S	H&S	H&S
ARABOH64RS1	1143	NT	Y	Y	N			H&S
ATWROH94RS1	1795	NT	N	N	N	H&S	H&S	H&S
BCVLOH5252A	12006	ATT	Y	Y	N			H&S
BCVLOHDCRS1	3307	ATT	Y	Y	Y			
BDFROH2323E	17913	ATT	Y	Y	N			H&S
BDMNOH7575E	16621	ATT	N	N	N	H&S	H&S	H&S
BEREOH2323E	23991	ATT	Y	Y	Y			
BKPKOH97RS1	1263	NT	Y	Y	N			H&S
BLBKOH84RS1	3626	ATT	N	N	N	H&S	H&S	H&S
BLLROH67RS1	5169	ATT	Y	Y	N			H&S
BLPROH42RS1	4821	ATT	Y	Y	N			H&S
BRFDOH44RS1	4475	ATT	Y	N	N		H&S	H&S
BRKLOHAARSI	950	ATT	Y	Y	Y			
BRTNOH8282A	8368	NT	N	N	N	H&S	H&S	H&S
BRTOOH83RS1	2962	ATT	Y	Y	N			H&S
BRVIOH4242A	3126	ATT	N	N	N	H&S	H&S	H&S
BTHSOH48RS1	1448	ATT	N	N	N	H&S	H&S	H&S
BWRVOH45RS1	367	ATT	N	N	N	H&S	H&S	H&S
CDVLOH76RS1	1307	ATT	N	N	N	H&S	H&S	H&S
CHFLOH24RS1	6856	ATT	Y	Y	N			H&S
CLEVOH4242F	46548	NT	Y	Y	Y			
CLEVOH5353F	31397	NT	Y	Y	N			H&S
CLEVOH6262F	46209	ATT	Y	Y	Y			
CLEVOH6262J	36788	NT	Y	Y	Y			
CLEVOH64RS1		ATT	N	N	N	TO BE REMOVED		
CLEVOH6464F	31790	ATT	Y	Y	Y			
CLEVOH67RLO		NT	Y	Y	Y			
CLEVOH74RS1	503	NT	Y	Y	N			H&S
CLHGOH32DS1	25285	NT	Y	Y	Y			

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
CLMBOH1122E	29464	ATT	Y	Y	Y			
CLMBOH1164A	42537	NT	Y	Y	Y			
CLMBOH27RS1	255	NT	Y	Y	Y			
CLMBOH29RS1	162	NT	Y	Y	N			H&S
CLMBOH4747C	30715	NT	Y	Y	N			H&S
CLMBOH8686C	57508	ATT	Y	Y	Y			
CNFDOH02533	7316	ATT	N	N	N	H&S	H&S	H&S
CNFLOH01854	4925	NT	N	N	N	H&S	H&S	H&S
CNTNOH45RS1	150	NT	N	N	N	H&S	H&S	H&S
CRRLOH75RS1	1443	ATT	Y	Y	N			H&S
CYFLOH92DS1	33151	NT	Y	Y	N			H&S
DBLNOH8988C	39347	ATT	Y	Y	Y			
DNVLOH88RS2	1099	ATT	N	N	N	H&S	H&S	H&S
DYTNOH2222J	35671	NT	Y	Y	N			H&S
DYTNOH2323E	23357	ATT	Y	N	N		H&S	H&S
DYTNOH8989C	20277	ATT	Y	N	N		H&S	H&S
ECLVOHEARS1	1876	NT	Y	Y	N			H&S
ECTNOH48RS1	3100	NT	N	N	N	H&S	H&S	H&S
ENONOH86RS1	3413	ATT	Y	N	N		H&S	H&S
FKLNOH0174E	10945	SSC	Y	Y	N			H&S
FLTCOH99RS1	743	NT	Y	Y	N			H&S
FRBNOH8787C	16883	ATT	Y	N	N		H&S	H&S
GNBGOH89RS1	5628	NT	N	N	N	H&S	H&S	H&S
GVCYOH8787C	17224	ATT	Y	Y	N			H&S
HLRDOH8787E	19534	NT	Y	Y	N			H&S
HRBGOH87RS1	3444	ATT	Y	Y	N			H&S
INDPOH5252A	19588	ATT	Y	Y	Y			
IRTNOH5353C	11649	NT	Y	Y	N			H&S
JMTWOH67RS1	2167	ATT	N	N	N	H&S	H&S	H&S
KENTOH6767A	26363	ATT	N	N	N	H&S	H&S	H&S
KRLDOH25RS1	3070	ATT	N	N	N	H&S	H&S	H&S
LCKBOH4949C	13711	SSC	Y	Y	N			H&S

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
LLVLOH53RS1	1756	ATT	N	N	N	H&S	H&S	H&S
LNCROH6565C	22935	ATT	Y	Y	N			H&S
LONDOH8585A	6852	NT	Y	N	N		H&S	H&S
LRTPOH7575G	14318	ATT	N	N	N	H&S	H&S	H&S
LSVLOH8787E	6984	NT	N	N	N	H&S	H&S	H&S
LYTPOH25RS1	889	ATT	N	N	N	H&S	H&S	H&S
MEWYOH84RS1	3239	ATT	Y	N	N		H&S	H&S
MGDROH6262C	6282	ATT	N	N	N	H&S	H&S	H&S
MGNLOH86RS1	3323	NT	N	N	N	H&S	H&S	H&S
MNCROH88RS1	4028	NT	N	N	N	H&S	H&S	H&S
MNJTOH53RS1	1426	ATT	Y	Y	N			H&S
MNTROH2525E	13709	SSC	Y	Y	N			H&S
MNTUOH27RS1	2701	ATT	N	N	N	H&S	H&S	H&S
MONROH53RS1	2776	ATT	Y	N	N		H&S	H&S
MOTLOH2525A	8551	ATT	N	N	N	H&S	H&S	H&S
MPHGOH6658A	36253	NT	Y	Y	N			H&S
MRBOOH93RS1	1040	NT	N	N	N	H&S	H&S	H&S
MRFYOH63RS1	8942	ATT	Y	Y	N			H&S
MRTTOH3737E	14839	ATT	Y	Y	N			H&S
MYHGOH4444C	31572	ATT	Y	Y	N			H&S
NCTNOH4949H	40984	NT	N	N	N	H&S	H&S	H&S
NHHNOH96RS1	1708	ATT	Y	N	N		H&S	H&S
NHLDOH49RS1	630	NT	Y	Y	N			H&S
NINDOH4848A	5992	NT	N	N	N	H&S	H&S	H&S
NJSNOH53RS1	1795	ATT	N	N	N	H&S	H&S	H&S
NLIMOH54RS1	2980	ATT	N	N	N	H&S	H&S	H&S
NOLMOH7777E	23173	ATT	Y	Y	N			H&S
NRTNOH2323A	15967	SSC	Y	Y	N			H&S
NVRROH87RS1	2009	NT	N	N	N	H&S	H&S	H&S
NWALOH8585C	4775	ATT	Y	Y	Y			
NWCROH8484C	5413	NT	N	N	N	H&S	H&S	H&S
NWMLOH54RS1	2313	ATT	N	N	N	H&S	H&S	H&S

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
NWMT0H86RS1	1207	ATT	Y	Y	N			H&S
NWPT0H47RS1	1084	ATT	Y	Y	N			H&S
NWRMOH66RS1	1484	NT	N	N	N	H&S	H&S	H&S
OLFLOH23RS1	7440	ATT	Y	Y	N			H&S
PARMOH8888E	48844	ATT	Y	Y	N			H&S
PIQUOH7777C	11690	NT	Y	Y	N			H&S
POLDOH75RS1	7022	ATT	N	N	N	H&S	H&S	H&S
PRBG0H6666C	10242	ATT	N	N	Y	H&S	H&S	
PTCHOH26RS1	519	ATT	N	N	N	H&S	H&S	H&S
RTTWOH32RS1	3996	ATT	N	N	N	H&S	H&S	H&S
RUVLOH53RS1	1031	ATT	Y	Y	N			H&S
SBNGOH93RS2	2889	NT	N	N	N	H&S	H&S	H&S
SBVIOH2626C	9211	ATT	N	N	N	H&S	H&S	H&S
SCLDOH72RS1	6847	ATT	Y	Y	N			H&S
SCTNOH46RS2	1351	ATT	N	N	N	H&S	H&S	H&S
SCVIOH6969C	7083	ATT	Y	Y	N			H&S
SDLIOH87RS1	321	NT	Y	Y	N			H&S
SGGVOH74RS1	1197	ATT	Y	Y	N			H&S
SGVLOH2323G	17327	SSC	Y	Y	N			H&S
SHSDOH67RS1	2745	ATT	Y	Y	N			H&S
SOLNOH2424A	15699	ATT	Y	Y	Y			
SPFDOH3939C	14276	ATT	N	N	N	H&S	H&S	H&S
SPNTOH37RS1	2276	NT	Y	Y	N			H&S
SPVYOH86RS1	819	ATT	N	N	N	H&S	H&S	H&S
SSLNOH88RS1	245	ATT	N	N	N	H&S	H&S	H&S
STBOOH6262E	4657	ATT	N	N	N	H&S	H&S	H&S
STRTOH7575A	9638	ATT	N	N	N	H&S	H&S	H&S
SVINOH56RS1	1229	ATT	N	N	N	H&S	H&S	H&S
TLMDOH6363G	12286	NT	N	N	N	H&S	H&S	H&S
TOLDOH2125C	7041	ATT	Y	N	Y		H&S	
TOLDOH47DS1	32783	SSC	Y	Y	N			H&S
TOROOH53RS1	3726	ATT	N	N	N	H&S	H&S	H&S

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
TRCYOH96RS1	523	ATT	N	N	N	H&S	H&S	H&S
TRENOH98RS1	2812	ATT	Y	Y	N			H&S
UNTWOH69RS1	6091	NT	N	N	N	H&S	H&S	H&S
UPAROH4545C	29944	ATT	Y	Y	N			H&S
UPAROH48RS1	1739	NT	Y	Y	N			H&S
WEVLOH8888E	44298	NT	Y	Y	N			H&S
WEVLOH88RS1	5417	ATT	Y	Y	Y			
WHHSOH87RS1	2112	ATT	Y	N	N		H&S	H&S
WJSNOH87RS1	3634	ATT	Y	Y	N			H&S
WLGH0H9495C	32660	SSC	Y	Y	N			H&S
WOTNOH88RS1	209	NT	Y	Y	N			H&S
XENIOH3737C	15565	ATT	N	N	N	H&S	H&S	H&S
YESPOH76RS1	3052	ATT	N	N	N	H&S	H&S	H&S
YNTWOH78DGT	19307	ATT	Y	Y	N			H&S
ZMMNOH4242C	20468	ATT	Y	N	N		H&S	H&S
ABRDOH79RS1	908	NT	Y	Y	N			H&S
BEVLOH92RS1	989	ATT	N	N	N	H&S	H&S	H&S
BLFSOH76RS1	400	NT	Y	Y	N			H&S
BLNGOH35RS1	598	NT	Y	Y	N			H&S
BMBGOH43RS1	4821	NT	Y	Y	N			H&S
CATNOH45RS1	709	ATT	N	N	N	H&S	H&S	H&S
CHSGOH36RS1	987	NT	Y	Y	N			H&S
CLBNOH4848A	4432	ATT	N	N	N	H&S	H&S	H&S
CNSVOH82RS1	698	NT	Y	Y	N			H&S
CRBGOH85RS1	704	ATT	N	N	N	H&S	H&S	H&S
CRNGOH34RS1	716	ATT	Y	Y	N			H&S
CSTLOH68RS1	2451	NT	Y	Y	N			H&S
CSTNOH6262C	9541	NT	Y	Y	N			H&S
DANHOH28RS1	565	NT	Y	Y	N			H&S
DFFYOH48RS1	1172	ATT	N	N	N	H&S	H&S	H&S

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
DLTNOH82RS1	1428	NT	N	N	N	H&S	H&S	H&S
DNFLOH67RS1	1968	ATT	Y	Y	N			H&S
DRSDOH75RS1	1670	ATT	Y	Y	N			H&S
EPLSOH42RS1	3690	ATT	N	N	N	H&S	H&S	H&S
FLHMOH84RS1	1065	ATT	Y	Y	N			H&S
FRMTOH3333C	15054	NT	Y	Y	N			H&S
FSTAOH4343A	8750	NT	Y	Y	N			H&S
GLPLOH4444A	7211	NT	Y	Y	N			H&S
GNDNOH25RS1	1194	NT	Y	Y	N			H&S
GYVLOH93RS1	708	ATT	N	N	N	H&S	H&S	H&S
HLBOOH3939J	6230	NT	Y	Y	N			H&S
JFVLOH42RS1	996	NT	Y	Y	N			H&S
LND SOH66RS1	555	NT	Y	Y	N			H&S
LSBNOH42RS1	4245	ATT	N	N	N	H&S	H&S	H&S
LTNAOH02RS1	1838	ATT	N	N	N	H&S	H&S	H&S
LWVLOH56RS1	565	ATT	N	N	N	H&S	H&S	H&S
MCVLOH25RS1	1497	NT	Y	Y	N			H&S
MDVLOH94RS1	456	NT	Y	Y	N			H&S
MRS HOH46RS1	704	NT	Y	Y	N			H&S
NLVLOH75RS1	3219	ATT	Y	Y	N			H&S
NRWCOH87RS1	904	ATT	Y	Y	N			H&S
NWCMOH49RS1	3963	NT	Y	Y	N			H&S
NWLXOH3434A	3909	ATT	Y	Y	N			H&S
NWRGOH59RS1	731	NT	Y	Y	N			H&S
NWWTOH45RS1	1361	ATT	N	N	N	H&S	H&S	H&S
PATROH37RS1	747	NT	Y	Y	N			H&S
RGRSOH22RS1	1156	ATT	N	N	N	H&S	H&S	H&S
RIGROH24RS1	1377	NT	Y	Y	N			H&S
RNBOOH36RS1	665	NT	Y	Y	N			H&S
RPLYOH39RS1	1417	NT	Y	Y	N			H&S
RSVLOH69RS1	1283	ATT	Y	Y	N			H&S
SALMOH3333A	10353	ATT	N	N	N	H&S	H&S	H&S

DIGITAL SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
SAVLOH67RS1	1070	ATT	N	N	N	H&S	H&S	H&S
SGTROH92RS1	457	NT	Y	Y	N			H&S
SHWNOH39RS1	1203	ATT	Y	Y	N			H&S
SMRTOH74RS1	1748	ATT	Y	Y	N			H&S
SND SOH6262C	22834	NT	Y	Y	N			H&S
TFFNOH4444B	12727	NT	Y	Y	N			H&S
THVLOH24RS1	2498	ATT	Y	Y	N			H&S
UHVLOH92RS1	5997	NT	Y	Y	N			H&S
UPSNOH2929A	4409	NT	N	N	N	H&S	H&S	H&S
VNTNOH38RS1	1266	ATT	Y	Y	N			H&S
WACHOH3333B	9369	NT	Y	Y	N			H&S
WLFYOH54RS1	2661	NT	Y	Y	N			H&S
WLVLOH53RS1	4080	ATT	N	N	N	H&S	H&S	H&S
WNCH OH69RS1	1144	NT	Y	Y	N			H&S
WOFDOH47RS1	2425	ATT	N	N	N	H&S	H&S	H&S
ZNVLOH4545C	28063	ATT	Y	Y	N			H&S

ATT - AMERICAN TELEPHONE & TELEGRAPH

NT - NORTHERN TELECOM INC.

SSC - SIEMENS STROMBERG CARLSON

H&S - HARDWARE & SOFTWARE

DS - DIGITAL SWITCH

ANALOG SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
AKRNOH7878E	22836	ATT	N	N	N	DS	DS	DS
AKRNOH86DS1	30222	ATT	N	N	N	DS	DS	DS
BCWDOH4683E	27425	ATT	Y	Y	N			DS
BKPKOH2636E	23407	ATT	Y	Y	N			DS
BRTNOH7474E	22115	ATT	N	N	N	DS	DS	DS
CLEVOH2525C	33257	ATT	N	N	N	DS	DS	DS
CLEVOH4343F	20617	ATT	N	N	N	DS	DS	DS
CLEVOH4545E	31993	ATT	Y	Y	N			DS
CLEVOH63DS1	27036	ATT	N	N	N	DS	DS	DS
CLEVOH7474E	42990	ATT	Y	Y	N			DS
CLMBOH2323C	40394	ATT	Y	Y	N			DS
CLMBOH25DS1	22030	ATT	N	N	N	DS	DS	DS
CLMBOH2626C	41071	ATT	Y	Y	N			DS
CLMBOH2727C	37138	ATT	Y	Y	N			DS
CLMBOH2929C	28614	ATT	Y	Y	N			DS
CLMBOH44DS1	19102	ATT	N	N	N	DS	DS	DS
CNTMOH43DS1	41918	ATT	N	N	N	DS	DS	DS
CNTNOH4545E	43006	ATT	N	N	N	DS	DS	DS
CNWIOH83DS1	17114	ATT	N	N	N	DS	DS	DS
CVTPOH0264E	10722	ATT	N	N	N	DS	DS	DS
DYTNOH2525E	40224	ATT	N	N	N	DS	DS	DS
DYTNOH2626C	14794	ATT	N	N	N	DS	DS	DS
DYTNOH2727C	37346	ATT	N	N	N	DS	DS	DS
DYTNOH2929C	40100	ATT	N	N	N	DS	DS	DS
ECLDOH7328E	42763	ATT	Y	Y	N			DS
ELVROH3838F	12007	ATT	N	N	N	DS	DS	DS
FNDYOH4242C	24338	ATT	N	N	N	DS	DS	DS
FVPWOH88DS1	7942	ATT	N	N	N	DS	DS	DS
HBRDOH02RS1	6361	ATT	N	N	N	DS	DS	DS
HLLDOH1186C	20209	ATT	N	N	N	DS	DS	DS
HTVLOH02877	5462	ATT	N	N	N	DS	DS	DS
LKWDOH52DS1	35217	ATT	N	N	N	DS	DS	DS
MAUMOH1189A	10800	ATT	N	N	N	DS	DS	DS

ANALOG SWITCHES

SWITCH	LINES	MAN	12-31-92 CAPABILITIES			UPGRADES NEEDED		
			SS7	CLASS	ISDN	SS7	CLASS	ISDN
MDTWOH42DS1	30019	ATT	N	N	N	DS	DS	DS
MMBGOH86DS1	19295	ATT	N	N	N	DS	DS	DS
MSLNOH0283E	28231	ATT	N	N	N	DS	DS	DS
NILSOH65DS1	17628	ATT	N	N	N	DS	DS	DS
NWRMOH66DS1	14965	ATT	N	N	N	DS	DS	DS
PNVLOH35DS1	25032	ATT	N	N	N	DS	DS	DS
ORGNOH69DS1	24343	ATT	N	N	N	DS	DS	DS
PRBGOH1487A	10748	ATT	N	N	N	DS	DS	DS
PRHGOH4747E	14465	ATT	N	N	N	DS	DS	DS
RKRVOH3333E	21948	ATT	Y	Y	N			DS
RVNNOH02DS1	13053	ATT	N	N	N	DS	DS	DS
SBVIOH28DS1	11495	ATT	N	N	N	DS	DS	DS
SECLOH3838E	25333	ATT	Y	Y	N			DS
SHHGOH92DS1	44191	ATT	Y	Y	N			DS
SPFDOH32DS1	34477	ATT	N	N	N	DS	DS	DS
STOWOH6868A	12645	ATT	N	N	N	DS	DS	DS
TOLODH2124C	35309	ATT	N	N	N	DS	DS	DS
TOLDOH38DS1	23404	ATT	N	N	N	DS	DS	DS
TOLDOH40DS1	17348	ATT	N	N	N	DS	DS	DS
TOLDOH5353C	28808	ATT	Y	Y	N			DS
TOLDOH72DS1	15450	ATT	N	N	N	DS	DS	DS
UPAROH4848C	22608	ATT	Y	Y	N			DS
WOTNOH8888C	55235	ATT	Y	Y	N			DS
WSLKOH87DS1	24413	ATT	N	N	N	DS	DS	DS
YNTWOH7474E	25684	ATT	N	N	N	DS	DS	DS
YNTWOH79DS1	28748	ATT	N	N	N	DS	DS	DS

ATT - AMERICAN TELEPHONE & TELEGRAPH

NT - NORTHERN TELECOM INC.

SSC - SIEMENS STROMBERG CARLSON

H&S - HARDWARE & SOFTWARE

DS - DIGITAL SWITCH

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