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Case Number: 96-336-TP-CSS 96-532-TP-UNC

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Confidential rebuttal testimony of James D. Webber filed on behalf of AT&T communications of Ohio by B. Kahn. (19 pgs.) (FILED UNDER SEAL)

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Case No. 96-532-TP-UNC		n the Matter of the Implementation of hubainute Senate Bill 306 or Substitute Iouse Bill 734 of the 121st General Issembly.
		Respondent.
		v. Amerilech Ohio,
		Complainant,
Case No. 96-336-TP-CSS		n the Matter of the Complaint of AT&T communications of Ohio, Inc.
IMISSION OF OHIO	EFORE ES COM	B The public utility

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52 East Gay Street Post Office Box 1008 Columbus, Ohio 43216-1008 16 336 532

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Vorys, Sater, Seymour and Pease

BEFORE

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THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of AT&T Communications of Ohio, Inc.)	Case No. 96-336-TP-CSS
)	
Complainant,)	
)	
v.)	
)	
Ameritech Ohio,)	
)	
Respondent.)	
In the Matter of the Implementation of)	Case No. 96-532-TP-UNC
Substitute Senate Bill 306 or Substitute	ý	
House Bill 734 of the 121st General)	
Assembly.)	

REBUTTAL TESTIMONY OF

JAMES D. WEBBER

ON BEHALF OF

AT&T COMMUNICATIONS OF OHIO, INC.

AT&T EXHIBIT _____

July 22, 1997

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1	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	Α.	My name is James D. Webber. My business address is 70 East Lake Street, Suite
3		630, Chicago, Illinois 60601.
4		
5	Q.	BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
6	A .	I am a Senior Consultant with Competitive Strategies Group, Ltd. ("CSG"), a
7		Chicago-based consulting firm that specializes in competitive issues within the
8		telecommunications industry. I am testifying on behalf of AT&T Communications
9		of Ohio, Inc.
10		
11	Q.	ARE YOU THE SAME JAMES WEBBER YOU PREVIOUSLY
12		TESTIFIED IN THIS PROCEEDING?
13	А.	Yes, I am.
14		
15	Q.	WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
16	A .	My primary purpose is to respond to the specific criticisms raised by Mr. O'Brien
17		regarding AT&T's pricing proposal in this proceeding. In particular, I
18		demonstrate, despite Mr. O'Brien's contentions, that properly performed Total
19		Element Long Run Incremental Cost ("TELRIC") studies would result in element
2 0		costs that are the same regardless of whether those elements are provided under
21		the name "reciprocal compensation" or the name "switched access." Further, the
22		level of shared costs that can legitimately be attributed to switched access (on a
23		per unit basis) is roughly the same as those levels which can be attributed to
24		reciprocal compensation. Finally, to the extent that the reciprocal compensation
25		rates approved as a result of the TELRIC proceedings contain Non Volume-

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1		Sensitive ("NVS") costs, AT&T's proposal is conservative because switched
2		access will actually receive a disproportionate share of common costs as I explain
3		later. ¹
4		
5		I will also demonstrate that Ameritech's residential services as a group do not
6		require a "subsidy" from access and, as a result, Ameritech's plea for revenue
7		neutrality is misplaced.
8		
9		
10	Q.	AT PAGE 23 OF HIS DIRECT TESTIMONY MR. O'BRIEN SUGGESTS
11		THAT AMERITECH'S RECIPROCAL COMPENSATION RATES
12		SHOULD NOT BE USED FOR SWITCHED ACCESS BECAUSE THERE
13		MAY BE COST DIFFERENTIALS IN PROVISIONING THE TWO
14		"SERVICES." IN ORDER TO BETTER UNDERSTAND HIS
15		CONTENTION, PLEASE DEFINE THE FOLLOWING: TELRIC,
16		SHARED COST AND COMMON COSTS.
17	А.	For the purposes of this proceeding, I am using the term TELRIC as having the
18		same meaning it did within the context of Ameritech's TELRIC proceeding, Case
19		No. 96-922-TP-UNC. In layman's terms, TELRIC is the least cost, forward-
2 0		looking incremental cost of the element being studied. Alternatively, TELRIC is
21		the economic cost the company would avoid if it did not provide the entire output
22		of the <u>element</u> in question.
23		

¹ These NVS costs are one-time implementation costs associated with the Telecommunications Act of 1996.

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1		For purposes of this proceeding, I use the term shared costs as it was defined
2		within the TELRIC proceeding. That is, shared costs are those forward-looking,
3		efficiently incurred costs which are associated with providing a group of elements
4		that are not captured within the TELRICs of each of the individual elements
5		contained in the group. Shared costs are only avoided when the entire group is no
6		longer offered by the firm.
7		
8		Common costs are those costs that are common to the entire firm: they are
9		avoided when the firm no longer exists.
10		
11	Q.	DOES AT&T'S PRICING PROPOSAL ACCOUNT FOR EACH OF
12		THESE COSTS?
13	A .	Yes, it does. In fact, AT&T's proposal is that Ameritech set its switched access
14		rates equal to the reciprocal compensation rates resulting from the TELRIC
15		proceeding. Specifically, the Commission's Order requires each of the reciprocal
16		compensation rate elements to be priced such that they recover TELRIC and
17		provide a contribution toward the group's shared costs and Ameritech's common
18		costs. Further, the PUCO's Order requires that each of those elements provide a
19		contribution toward the NVS costs which were identified in that proceeding. 2
20		Hence, the rate for each of these elements is based upon the following: TELRIC +
A 1		
21		X% (for shared costs) + Y% (for common costs) + Z% (for NVS costs). ³

² An exception to this "rule" may be if imputation is involved. Arguably, a price can be reduced to TELRIC in order for an imputation test to be passed. ³ AT&T has filed an application for rehearing in the TELRIC proceeding that includes a request for reconsideration of the Commission's decision regarding NVS costs. To the extent that the Commission may modify its Order regarding NVS costs, therefore, my proposal would have to be modified accordingly.

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1		Therefore, to the extent that the TELRIC for each individual element is constant
2		and the shared costs are equal (on a per unit basis), access rates that are set equal
3		to Ameritech's reciprocal compensation rates will recover all of the individual
4		elements' TELRICs and provide a contribution to the group's shared costs as well
5		as Ameritech's common costs, regardless of whether the name under which the
6		elements are sold is "reciprocal compensation" or "switched access." Further, to
7		the extent that the NVS costs identified in the TELRIC proceeding bear little or
8		no relationship to switched access, AT&T's proposal to include those costs in the
9		access rates is extremely conservative and allows for a larger contribution to
10		common costs from access than the Commission's Order requires for reciprocal
11		compensation. ⁴
12		
13	Q.	PLEASE EXPLAIN HOW ACCESS RATES THAT ARE SET EQUAL TO
14		RECIPROCAL COMPENSATION RATES WILL CONTRIBUTE TO
15		AMERITECH'S COMMON COSTS DISPROPORTIONATELY?
16	A .	Diagram 1.0 illustrates which portions of the reciprocal compensation and
17		switched access rates are comprised of TELRIC, shared costs, common costs and
18		NVS costs. Given that 1) the TELRIC of each element is constant despite the
19		name under which it is sold, 2) the shared costs are the same on a per unit basis,
20		3) NVS costs are not attributable to access, and 4) the rates are identical, the
2 1		relative composition of these rates is such that access provides roughly twice the
22		contribution toward common costs than reciprocal compensation does.
23		

⁴ This contribution will be approximately 10% larger than required. Hence, the access elements will provide approximately 20% (of TELRIC) in contributions to common costs.



⁵ The numbers expressed in this diagram are expressed as a percentage of the total rate. As a result, the percentage of shared and common costs shown are lower than the effective TELRIC "markups" ordered by the Commission.

1	demands for that element. ⁶ Hence, the notion that an element has two or more
2	economic costs contradicts the costing paradigm into which this industry has
3	entered. Further, although Mr. O'Brien was not involved with the preparation of
4	Ameritech's TELRIC studies and has not reviewed any of those studies, Mr.
5	O'Brien bases his insupportable position on those studies. Tr. Vol. No. 3 at p.21.
6	First, he states that there are differences between the traffic patterns involved with
7	access and reciprocal compensation. Second, he claims that call set-up costs will
8	be different because access traffic originates and terminates while reciprocal
9	compensation traffic only terminates. Finally, he claims that there are cost
10	differences between access and reciprocal compensation that are due to the
11	disparate levels of demand.
12	

13 While it's debatable as to whether these contentions have any merit, there is no 14 doubt regarding whether TELRIC studies can result in multiple costs for the very same elements, they cannot. The relevant question is whether there are any 15 legitimate differences in the network functionalities supporting reciprocal 16 17 compensation and switched access service and, if so, what effect such differences 18 would have on the TELRIC studies. I will address each of these issues 19 individually based upon my review and modification of Ameritech's proposed 20 reciprocal compensation studies in Ohio, Illinois, Michigan and Indiana.

⁶ The Commission's local service guidelines Section V.B. specifically require this approach.

Traffic Patterns and Tandem Routing

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3	Ameritech claims that differences in the traffic patterns associated with access and
4	reciprocal compensation (as services) will drive cost differences in the
5	provisioning of the individual elements which comprise those services. While Mr.
б	O'Brien has not offered any evidence to demonstrate that this speculation is true,
7	the simple fact is that Ameritech's TELRIC studies assume very generic
8	parameters which render these points moot. For example, the Network Cost
9	Analysis Tool ("NCAT") runs that I have seen throughout the region employ
10	assumptions such as: 1) all time periods, 2) all distance bands, and 3) 100%
11	tandem routed traffic. Given that these studies assume the most generic
12	parameters, it's not possible to state clearly that differences in the time of day, for
13	example, affect the results.
14	
15	Hence, traffic patterns and tandem usage as cost drivers will not create the
16	differences in costs to which Mr. O'Brien alludes. Further, many of the rate
17	elements at issue in this proceeding are not traffic sensitive and would not be
18	affected by these purported routing differences if, in fact, they existed.
19	
20	
21	Originating and Terminating vs. Terminating Only
22	
23	Mr. O'Brien also speculates that cost differentials would likely exist due to the
24	fact that reciprocal compensation involves terminating traffic only while access

25 includes both originating and terminating traffic. While the question as to whether

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1	all reciprocal compensation traffic will originate outside of Ameritech's physical
2	network is debatable, the relevant question should address how the reciprocal
3	compensation studies were developed and whether the NCAT can study
4	terminating traffic only. The TELRIC studies I reviewed for reciprocal
5	compensation and the NCAT output supporting those studies contain phrases
6	such as "bell to bell traffic" and cost of "origination" and "termination, " thus
7	indicating that both ends of the network usage were modeled. Further, the studies
8	very clearly account for call set-up expenses which are typically associated with
9	call origination.
10	
11	I do not believe that Ameritech has studied only the termination of traffic
12	throughout its reciprocal compensation studies.
13	
14	Demand
15	
16	Another red herring raised by Ameritech in defense of its position that the
17	TELRICs for access and reciprocal compensation must be different pertains to the
18	demand for those elements. While this Commission's local service guidelines ⁷
19	very clearly indicate that the TELRIC of an element is to be studied based upon
20	all uses of that element regardless of who purchases the element, Ameritech
21	appears to argue that cost differences will exist because of the differences in
22	demand for the individual elements as services. Clearly, Ameritech's arguments are
23	fundamentally inconsistent with the local service guidelines. ⁸ In fact, Ameritech

 ⁷ See, for example, the local competition guidelines at Section V. B. (11).
⁸ If Ameritech is stating that it performed its TELRIC studies improperly, perhaps the Commission should examine such an issue in any rehearing of the TELRIC proceedings that might occur in the future.

1 cannot support its argument that these supposed differences in demand drive cost 2 differences given its long-standing, public position that its network usage costs are 3 relatively linear and that the per unit cost developed though the use of NCAT will 4 not vary regardless of whether the amount of incremental usage is increased by 5 10%, 50% or 100%. 6 7 For example, in Ameritech Illinois' alternative regulation proceeding where the 8 use of NCAT became an issue, Ameritech's cost expert, Mr. Palmer, stated at 9 p.11 of his rebuttal testimony "Finally, the result would be the same if I 10 incremented demand by 10% (as presented in my direct testimony) 50% or 100% to develop the unit costs."⁹ Mr. Palmer also stated in the Illinois TELRIC 11 12 proceeding that "the unit cost function becomes linear after a certain point." (TR 13 at 536. ICC Docket No. 96-0486 and 96-0569.) And, finally, Mr. Palmer stated 14 in the Indiana TELRIC proceeding that with regard to usage costs "if I process 15 3.5 billion messages, I have to add a little more capacity to add some more messages. I do the division and I'm at the same place." (TR. AT 213. Cause No 16 17 40611.) 18 19 Properly designed TELRIC studies simply cannot consider differences in demand 20 as driving cost differences in the TELRICs that comprise the services at issue in 21 this proceeding. Further, even if the studies could legitimately be based upon 22 disparate demand levels, Ameritech's cost experts would surely argue, as they 23 have in the past, that such differences in demand would not drive cost 24 differentials.

⁹ Indeed, the ICC found in favor of Ameritech's position on this very issue. See Order in ICC Docket No. 92-0448 and 92-0239 Consol.

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2	Q.	ASSUME, HYPOTHETICALLY, THAT MR. O'BRIEN'S ASSUMPTION
3		THAT THE RECIPROCAL COMPENSATION STUDIES ARE BASED
4		ONLY UPON TERMINATING TRAFFIC IS TRUE. WHAT ACCESS
5		RATE ELEMENTS WOULD POTENTIALLY BE AFFECTED?
6	A .	Due to the fact that the end office switching and tandem switching elements
7		contain the type of set up expenses that may be affected by the direction of traffic,
8		they might be affected by any cost differences that arise from the hypothetical
9		described above. However, these are the only two elements that might be
10		effected by such a hypothetical; and, they would only be effected 50% of the time.
11		
12	Q.	MR. O'BRIEN ALSO CLAIMS THAT THE JOINT COSTS WOULD NOT
13		BE THE SAME FOR ACCESS AS THEY ARE FOR RECIPROCAL
14		COMPENSATION. DO YOU AGREE?
15	А.	I believe the types of joint or shared costs that would be attributed to access in a
16		properly performed study would be the same as those costs attributed to
17		reciprocal compensation. In both cases, Ameritech is providing the same elements
18		to the same customers. To suggest that the costs the company would incur in
19		these two identical endeavors would be radically different flies in the face of what
20		is supposed to be built into TELRIC studies, i.e., a least-cost, forward-looking
21		network which is designed to accommodate multiple providers and provider
22		types, where all units of the functionality being studied are considered.
23		
24		In fact, the shared cost studies contained in the TELRIC proceeding actually
25		include multiple expense items that I would not expect to see included in an

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1		access shared cost study. These items include legal and public policy expenses
2		related to compliance with all facets of Telecommunications Act of 1996, as well
3		as all of the new personnel and equipment required to implement Ameritech's
4		network unbundling and resale activities. If anything, based upon those items
5		being included in the shared costs for reciprocal compensation, I'd anticipate that
6		access shared costs (on a per unit basis) would be equal to or slightly less than the
7		shared costs associated with reciprocal compensation.
8 9	Q.	YOUR RESPONSE TO THE PREVIOUS QUESTION IS LIMITED TO A
10		QUALITATIVE ANALYSIS, WHY IS THAT?
11	A .	Ameritech Ohio has not provided me with an Ohio specific access study that
12		contains both incremental and shared costs which can be compared to the Ohio
13		specific reciprocal compensation studies I reviewed during the TELRIC
14		proceedings. Hence, my analysis is necessarily restricted to qualitative arguments
15		and my discussion, therefore, is based upon my previous experiences with cost
16		studies of this nature.
17		
18	Q.	DO YOU HAVE ANY PREVIOUS EXPERIENCE TO HELP
19		DETERMINE WHETHER THE LEVEL OF SHARED COSTS
20		ATTRIBUTABLE TO ACCESS IS ACTUALLY THE SAME, HIGHER
21		OR LOWER THAN THAT WHICH IS ATTRIBUTABLE TO
22		RECIPROCAL COMPENSATION?

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1	A.	Based upon data Ameritech Illinois provided in its 1997 alternative regulation
2		proceeding (ICC Docket No. 97-0157) regarding its current access cost studies, I
3		know that the level of shared costs Ameritech Illinois attributes to its access
4		services is smaller than the mark-up Ameritech Illinois proposed for its reciprocal
5		compensation studies in the TELRIC proceedings. Similarly, the Ameritech
6		Illinois access study reflects a mark-up for shared costs that is smaller than the
7		mark-up approved by this Commission in Ameritech Ohio's TELRIC proceeding.
8		Hence, based upon the Illinois experience, Ameritech's calculations suggest to me
9		that shared costs for switched access will be roughly the same, if not lower, than
10		the reciprocal compensation shared costs. The Illinois Data are contained in
11		Attachment No. 1.
12		
13	Q.	WHY ARE COST STUDIES FOR AMERITECH ILLINOIS' ACCESS
14		SERVICES RELEVANT TO THIS PROCEEDING?
15	A .	As was the case with the TELRIC proceedings, an analysis of Ameritech's access
16		shared costs will likely start at the "company" level incorporating company costs
17		that are associated with provisioning access services throughout the region. Such
18		costs will likely include a substantial share of the costs contained in the Ameritech
19		Long Distance Industry Services ("ALDIS") budget. Then, those regional costs
20		will likely be allocated across the state jurisdictions through some relative

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1		allocation process which is typically based upon relative incremental costs or
2		some other cost determinant such as relative minutes of use.
3		For example, if Illinois comprises roughly 25% of the incremental access costs
4		and Ohio comprises only 20%, each state would receive their proportionate share
5		of the access shared costs. This is another way of stating that they each will
6		receive a constant mark-up over their incremental costs toward access shared
7		costs. Hence, the shared costs are likely to be consistent throughout the region.
8		
9	AME	RITECH'S RESIDENTIAL SERVICES DO NOT REQUIRE A "SUBSIDY"
10	FROM	A SWITCHED ACCESS
11		
12	Q.	MR. O'BRIEN CLAIMS THAT AMERITECH OHIO'S RESIDENTIAL
13		SERVICES REQUIRE A SUBSIDY FROM SWITCHED ACCESS AND
14		IMPLIES THAT WITHOUT SUCH A SUBSIDY AMERITECH MAY
15		HAVE TO RAISE RESIDENTIAL RATES. IS THAT TRUE?
16	А.	One of the fundamental issues which should be explored in order to fully evaluate
17		and respond to Mr. O'Brien's claim is Ameritech Ohio's return on equity both
18		before and after the relief sought in this case is granted. Given that AT&T is
19		precluded from presenting such evidence in this case, I can only explore the issue
20		of whether Ameritech Ohio's residential services are provided at rates which are
21		below their economic costs.
22		
23		In order to conduct this analysis, I have compared the revenue and cost data that
24		Ameritech made available to me during the latter part of last week in order to

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1		build a "residential services subsidy test." This analysis demonstrates that
2		Ameritech's residential network access lines (loops and CO termination) for areas
3		B, C and D combined are sold at rates which do not recover their LRSICs plus an
4		allocation of shared costs. ¹⁰ However, contributions from both the residential
5		usage services (local and toll) and the residential calling features more than offset
6		these losses. For example, the contribution (rates less (LRSICs and shared costs))
7		from custom calling features alone is over two (2) times the deficit associated
8		with residential network access lines. Furthermore, the contribution generated
9		from the residential usage services is roughly four (4) times the revenue shortfall
10		which can be attributed to Ameritech Ohio's residential network access lines.
11		
12		In short, this analysis demonstrates that Ameritech's residential services, when
13		taken as a whole, provide more than ample revenues that cover the associated
14		costs. These data are presented in Attachment No. 2 to this testimony.
15		
16	Q.	DID YOUR ANALYSIS FOCUS ONLY ON THE MARGIN BETWEEN
17		REVENUES AND LRSICS?
18	Α.	No, I included a 13.52% markup over LRSIC for shared costs consistent with the
19		PUCO's Order in Case No. 96-922-TP-UNC.
20		
21	Q.	DID YOUR ANALYSIS ACCOUNT FOR ALL REVENUES WHICH CAN
22		BE ATTRIBUTED TO RESIDENTIAL CUSTOMERS?
23	Α.	No, it did not. Significant revenues were left on the table, so to speak, due to the
24		fact that Ameritech did not have cost studies for all residential services. For

¹⁰ To the Extent that the residential access line analysis completely ignores the new multi-line End User Subscriber Line Charge ("EUCL" or "SLC"), the revenue shortfall in access lines is overstated.

1		example, operator services and directory assistance services were unaccounted
2		for, thus making my analysis conservative. Including these revenues would
3		further increase the difference between Ameritech Ohio's revenues and its costs
4		for residential services.
5		
6	Q.	DOES THIS CONCLUDE YOUR TESTIMONY?
7	A .	Yes, it does.

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Aggregate Revenue Test Atta Non-Competitive Services Page

Attachment # 1 Page 1 of 1

	Non-Competitive			Shared	Total
	Services	<u>Revenues</u> a	<u>LRSICs</u> b	Costs c	Asson Cost d=b+c
1	Network Access				
Ζ	IntraMSA Calling				
3	Switched Access	\$91,105,283	\$28,218,709	\$3,135,460	\$31,354,170
4	ISDN Direct/Prime				•
5	CCS. ACCS, CNS				
6	ACBS				
7	AEBS				
8	911				
9	Remote Call Forwarding				
10	Private Line/Special Access				
11	DID Trunks				
12	Directory Services				
13	Optinet				
14	NonCompetitive Local OS				
15	DAVCNA				
16	Non-recurring Charges				
17	Other Services			A1	
18	Other Carrier		1:11NF11FN11	Al	
19	Unbundled Network Elements			7 1 Le	

20 Non-Competitive Totals

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Solely for the use by employees of Ameritech companies who have a need to know. Not to be disclosed to or used by any other person without authorization.

Attachment # 2 Page 1 of 2

			9	io Resider	ntial Servi	ces "S	ubsidy Test"	ŀ	
Access Area	Access Lines	ۍ ې	 5	LRSIC plus shared	Annual T Revenu	Total UE	Annual Total Co with Shared Cos	ost stø	Margin over LRSIC With Shared Costs
	252,592.00 1.143.986.00	6	0.20	\$ 7.83 \$ 10.81	s 30,5 140,6	917,261 023,886	\$ 23,742, \$ 149,760,	274 853	\$ 7,174,981 \$ (9,736,767
	1,190,402.00	• • •	0.20	\$ 13.95	\$ 145,7	705,205	\$ 199,296,	265	\$ (53,591,06(
Totals	2,586,980.00				\$ 316,6	846,352	\$ 372,799,	192	\$ (58,152,84(
	-			Total Annual F	Residential Ac	cess Lin	ne Revenue Short	'all	(58,152,84)
				<u>8</u> 0	atribution froi	m "other	residential Servic Differer	Se	285,458,576

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Other	Residential Servic	es (With Shared C	osts)
		Annual Cost with	Annual Margin With
Service	Annual Revenue	shared costs	Shared Costs
Caller ID per Line Blocking	\$ 1,805,794	\$ 102,497	\$ 01,703,297
Information Call Completion	\$ 656,084	\$ 73,287	\$ 582,797
Multi Ring 1	\$ 640,656	\$ 473	\$ 640,183
Multi Ring 2	\$ 20,390	30	\$ 20,360
3-way Calling	\$ 10,781,472	\$ 13,157	\$ 10,768,315
Call Forwading	\$ 5,708,443	\$ 4,050	\$ 5,704,393
Call Walting	\$ 55,885,252	\$ 9,684	\$ 55,675,568
Caller ID W/Name	\$ 10,447,515	\$ 711,601	\$ 9,735,914
Calter ID	\$ 32,323,021	\$ 124,192	\$ 32,198,829
Repeat Dialing	\$ 2,951,152	\$ 5,025	\$ 2,946,127
Call Screening	\$ 730,972	\$ 93,352	\$ 637,620
Pay Per Use	\$ 8,207,436	\$ 478,277	\$ 7,729,159
Call Trace	\$ 400,001	\$ 323,046	\$ 76,955
Call Waiting Value Pack	\$ 1,685,924	\$ 2,856	\$ 1,683,068
Caller ID Value Pack	\$ 7,317,466	\$ 97,269	\$ 7,220,177
package discount	\$ (372,578)		\$ (372,578)
Caliing feature discount	\$ (12,082,570)		\$ (12,082,570)
sub total	\$ 126,906,430	\$ 2,038,816	\$ 124,867,614
Resdiential Local Usade	\$ 232,922,281	\$ 52,495,040	\$ 180,427,221
Residential Toll	\$ 92,043,241	\$ 55,726,660	\$ 36,316,581
sub total	\$ 324,965,502	\$ 108,221,700	\$ 216,743,802
total	\$ 451,871,932	\$ 110,260,516	\$ 341,611,416