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DOCKETING DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application)
of The Ohio Bell Telephone)
Company for approval of an)
alternative form of regulation.)

Case No. 93-487-TP-ALT

SUPPLEMENTAL TESTIMONY OF DANIEL R. MCKENZIE
AMERITECH OHIO EXHIBIT 24S.0
SUBJECT: RATES, TARIFFS AND SERVICE CLASSIFICATION

1. Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE
RECORD.

A: Daniel R. McKenzie, 45 Erieview Plaza, Cleveland, Ohio.

2. Q: ARE YOU THE SAME DANIEL R. MCKENZIE WHO PREVIOUSLY
FILED DIRECT TESTIMONY AND ADDITIONAL DIRECT TESTIMONY
IN THIS CASE?

A: Yes, I am.

3. Q: WHAT IS THE PURPOSE OF THIS SUPPLEMENTAL TESTIMONY?

A: The purpose of this testimony is to address certain
issues raised and recommendations made by the PUCO
Staff (the Staff) in its Report of Investigation (the
"Staff Report") and the National Regulatory Research
Institute (NRRI) Addendum to the Staff Report in this
case. In addition, I discuss the cell classification
of new services.

4. Q: HAVE YOU READ AND ARE YOU FAMILIAR WITH THE PUCO STAFF
REPORT OF INVESTIGATION AND THE NRRI ADDENDUM TO THE
STAFF REPORT IN CASE NO. 93-487-TP-ALT?

A: Yes.

5. Q: DO YOU AGREE WITH THE STAFF'S STATEMENT THAT IT WOULD
BE INAPPROPRIATE TO PRICE ANY CELL 1 MONOPOLY SERVICES
ABOVE COST? (STAFF REPORT AT P.35)

A: No. While the Staff Report is not clear what is meant by "cost" in this context, to the extent that the Staff is referring to Long Run Service Incremental Cost (LRSIC), this statement is clearly incorrect. As contained in the Commission's rules for services in Cells 2, 3 and 4 and endorsed by the Staff in the Staff Report, LRSIC is an appropriate price floor. To impose it as a price ceiling for Cell 1 services prevents these services from contributing to joint and common costs and would be clearly inappropriate. In my direct testimony, I stated that the price for non-residence access line should be above LRSIC as well as above the average joint cost identified by Dr. Currie. The Staff found its deaveraging proposal to be reasonable and recommended its approval.

6. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION TO LIMIT PRICE DECREASES FOR SERVICES IN CELLS 1, 2 AND 3 TO TEN PERCENT ANNUALLY? (STAFF REPORT AT P. 45)

A: No, I do not. The limit on downward pricing flexibility is not reasonable. It harms customers by denying them price decreases which they might otherwise enjoy. In the case of competitive services, it creates a particularly difficult condition because it artificially constrains prices, rather than relying on the marketplace. In many cases, this limit would result in the Company having less pricing flexibility

than exists today. For example, many of the services contained in Cells 2 and 3 are flexibly (minimum/maximum) priced as a result of the pricing flexibility granted through previous Commission proceedings such as 84-944-TP-COI and 86-1144-TP-COI. The price for one of these services which is currently at the maximum price could be decreased by as much as fifty percent on seven days notice. The Company's requested pricing flexibility is merely a natural extension of what the Commission has already approved. The Staff's proposed ten percent limit, on the other hand, means that it would take five years, rather than seven days, to affect a fifty percent price reduction. This greatly increased delay is inconsistent with the notion of additional pricing flexibility in an alternative regulation environment and has the effect of regressing from the flexibility granted in the 944 and 1144 cases.

The Advantage Ohio Plan already places restraints on any practical ability of the Company to rapidly decrease its prices. For example, as noted in Mr. Romo's testimony, any decrease of more than twenty percent in one year would not affect the price cap. In other words, if the price for a service were decreased thirty percent in a year, the Company would only receive "credit" for the first twenty percent. The

other ten percent could not be recouped through price increases for other services. While not preventing the Company from reducing prices, this limitation provides a strong incentive to limit the amount of decrease.

As discussed in the testimony of Dr. Currie, neither cross subsidization nor predatory pricing can exist if the price for a service passes a total incremental cost test. As I stated in my direct testimony, LRSIC studies will be submitted to the Commission with price decreases for Cell 1 and Cell 4 services and changes to the minimum price for services in Cells 2 and 3.

Furthermore, Competitive Telephone Service (CTS) providers, as a result of the Commission's decisions in Case No. 89-563-TP-COI, have no such limit. Neither should Ameritech Ohio. Staff concerns about cross subsidization should be satisfied by their ability to review costs and by their ongoing oversight. That ongoing oversight provides a strong incentive to maintain price stability.

7. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION TO LIMIT PRICE INCREASES FOR SERVICES IN CELLS 2 AND 3 TO FIFTEEN PERCENT ANNUALLY? (STAFF REPORT AT P. 46)

A: No. As with the proposed limit on price decreases, this recommendation creates an artificial price constraint, which in many cases results in

considerably less pricing flexibility than the Company has today. As I alluded to in my prior answer concerning price decreases, the Company can theoretically increase the price for its flexibly priced services by up to 100 percent on seven days notice minimum to maximum). To impose an arbitrary fifteen percent limit means that it would take seven years to do what can be done today in seven days. Keep in mind that customers have adequate alternatives for Cell 2 services, and that the providers of those alternatives who are regulated by the Commission have no such pricing constraint (Case No. 89-563-TP-COI). Marketplace forces and our price cap formula adequately protect customers from precipitous price increases for the competitive Cell 2 and discretionary Cell 3 services.

Finally, the Staff proposals for both increases and decreases deviate from the Commission Rules, which propose no such price limitations for Cell 2 and Cell 3 services. Staff does not explain why it is deviating in this manner.

8. Q: DO YOU AGREE WITH THE STAFF'S POSITION ON NICKEL ROUNDING FOR MONIES COLLECTED FROM PAYPHONES? (STAFF REPORT AT PP. 45-46)

A: Yes. The Staff proposal to round the price for charges collected from payphones is appropriate.

9. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION TO REQUIRE A 30 DAY REVIEW PERIOD FOR CONTRACTS OR NEW SERVICE OFFERINGS? (STAFF REPORT AT PP. 46 AND 80)

A: No. As I discuss in my direct testimony at pages 17, 41 and 42, Ameritech Ohio needs to be able to enter into competitive contracts and introduce new services quickly to meet competition and customer expectations. The Commission has granted Competitive Telecommunications Service providers the opportunity to implement these types of offerings effective immediately. The same opportunity should be afforded to Ameritech Ohio. The Staff could review the contracts or new service tariffs on an ongoing basis. Customers, however, do not understand why they should be expected to wait for their contracts or new services or why Ameritech Ohio should have its hands tied while competitive providers do not. The public interest, represented by customers, requires these contracts or new services be effective immediately, as most Centrex agreements are today.

10. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION THAT AMERITECH OHIO PROPOSE TARIFF FILING RULES FOR THE INTRODUCTION OF NEW SERVICES INTO CELLS 1, 2 AND 4? (STAFF REPORT AT P. 58)

A: The Commission's rules anticipate that most new services will be introduced into Cell 3. I agree with that assessment and have proposed specific rules as part of my discussion of Cell 3 services. I stated in my direct testimony that on those occasions where a new service clearly meets the definition of a different cell, it would be appropriately classified to that cell. The rules I proposed for new services would apply equally to any new services introduced directly into any of the other cells, and in my opinion, meet the Staff's intent. CTS providers under Case No. 89-563-TP-COI have flexibility on any services they may introduce. Consequently, I do not believe that more detailed administrative regulations are necessary or appropriate.

11. Q: ARE YOU AWARE OF THE STAFF'S CONCERN WITH THE INCLUSION OF BOTH MONOPOLY AND COMPETITIVE SERVICES WITHIN THE SAME RESIDENCE OR NONRESIDENCE SERVICE GROUPS? (STAFF REPORT AT P. 43)

A: Yes. The Advantage Ohio plan recognizes this concern and imposes the necessary safeguards in the form of cell specific pricing restrictions and through the

price cap plan. The least competitive services, such as those in Cell 1, are afforded the greatest pricing protection. The most competitive services, those in Cell 4, are detariffed and afforded the most pricing flexibility. The Cell 1 price restrictions, coupled with the price cap constraints incorporated into our plan should satisfy any reasonable concern in this area.

12. Q: DO YOU AGREE WITH THE STAFF AND NRRI PROPOSALS THAT AMERITECH OHIO SHOULD NOT BE PERMITTED TO CARRY OVER UNUSED PRICE FLEXIBILITY FROM ONE ANNUAL PERIOD TO THE NEXT? (STAFF REPORT AT P. 47)

A: No. The inability to carry over pricing flexibility provides a very strong incentive to always maximize prices. Staff and NRRI seem to be saying, essentially, "use it or lose it." This position could result in customers facing higher prices than they otherwise would see. That incentive is contrary to the customer interest. NRRI erroneously assumes that the ability to carry over flexibility is a sign of inefficiency or equates to an attempt to raise monopoly prices and engage in predatory pricing for competitive services. This is nonsense. Advantage Ohio contains provisions, i.e. pricing rules which address these concerns as well as any concern over "rate shock" due to the use of carried over upward flexibility. Advantage Ohio places

the greatest pricing restrictions on the least competitive services, i.e. those assigned to Cell 1. It also provides that the Company will price its Cell 2, 3 and 4 services above LRSIC, thereby eliminating the ability of Ameritech Ohio to improperly price even if we were inclined to do so. The marketplace must be allowed to govern and the public interest is best served by allowing the marketplace to function. Staff and NRRI's proposal to remove flexibility can only be predicated on the belief that the marketplace is not sufficient for the protection of the public interest. That is simply wrong.

13. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION TO REMOVE TELEPHONE SERVICE ASSISTANCE (TSA) FROM THE RESIDENCE BASKET AND AFFORD IT NO PRICING FLEXIBILITY? (STAFF REPORT AT P. 47)

A: No. The Staff recommendation is apparently based on its belief that there is a statutory requirement that the current TSA rates can never be increased. I am not aware of any such requirement. My understanding of the statute is that the price for the access line is established through the statutory formula and that the discount or credit from normal residence prices provided to TSA customers is the higher of the end user common line (EUCL) in effect currently or when TSA was implemented. The usage price, however, is the regular

tariffed residence usage price, which can fluctuate.
As a result, changes to TSA are possible and some pricing flexibility should be available for TSA.

It should be noted that with the line rate established by the statute, the effect of my proposal to eliminate a separate charge for Touch-Tone and to include that amount in the price for a component of the current residence access line, i.e. the central office termination, will be to provide Touch-Tone at no charge for TSA customers.

14. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION TO INCLUDE RESIDENCE FLAT RATE USAGE IN THE RESIDENCE BASKET?
(STAFF REPORT AT PP. 47 AND 56)

A: No, I do not. As I stated in my direct testimony, Ameritech Ohio, as part of its Advantage Ohio commitments, guarantees the ongoing availability of flat rate residence service. I am proposing to limit price increases for the \$8.55 usage package to reflect the changes in actual aggregate average usage. In this way, the aggregate price per call does not increase. Therefore my proposal to exclude flat rate service from the residence basket while also limiting price increases to the Cell 1 price limit (change in the PCI plus five percent) represents a reasonable approach which should meet customer expectations for a flat rate

service, while at the same time, recognizing that prices should reflect costs.

15. Q: DO YOU AGREE WITH THE STAFF PROPOSAL THAT YOU ADOPT, WORD FOR WORD, THE CELL DEFINITIONS SET FORTH IN THE COMMISSION RULES? (STAFF REPORT AT P. 54)

A: The definitions set forth in my testimony are consistent with the Commission rules. The Staff Report sets forth no reason why my definitions are inappropriate, other than that they are not identical to those in the Rules. The difference is that I have more completely and clearly described Cell 3 services. In so doing I have remedied an ambiguity. I believe that this approach is reasonable and should be accepted by the Commission.

16. Q: DO YOU AGREE WITH THE STAFF PROPOSAL TO RECLASSIFY DIRECTORY ASSISTANCE (DA) FROM CELL 3 TO CELL 1? (STAFF REPORT AT P. 55)

A: No. The Staff reasons that Ameritech Ohio is the only source for assigning telephone numbers and therefore controls the distribution of information about these numbers. However, telephone numbers available from directory assistance operators are assigned by many parties, including other local exchange carriers and cellular providers. Thus, the assignment of telephone numbers is not the issue. The issue is that Directory

Assistance is discretionary. The vast majority of calls are made without the use of Directory Assistance. Furthermore, users are provided telephone directories to aid them in obtaining telephone numbers. Numbers can also be obtained from other sources, including from other people and from advertising. It is therefore unreasonable to conclude that DA is necessary to make a call and thereby require Cell 1 classification.

The Commission should also recognize that telephone numbers are available from many sources, including telephone directories provided by parties other than Ameritech, interexchange carriers, CD-ROMs for personal computers, and other sources. While DA could therefore fit within the Cell 2 definition, I continue to believe that Cell 3 is more appropriate for the reasons discussed above.

17. Q: DO YOU AGREE WITH THE STAFF'S RATIONALE THAT SELECTIVE CALL SCREENING BE RECLASSIFIED FROM CELL 3 TO CELL 1? (STAFF REPORT AT P. 55)

A: No, I do not. This service limits the types of calls which can be placed from a given line. For example, a business may wish to prevent toll calls from being billed to a conference room line. Any attempt to place a direct dialed (1+) toll call from that line is routed to an operator who facilitates billing the call via

collect, third number or calling card. As can be seen by this example, selective call screening is a discretionary service that is not needed to make a call and has neither privacy nor public safety implications which could warrant Cell 1 treatment. The service meets the criteria for a Cell 3 discretionary service.

18. Q: DO YOU AGREE WITH THE STAFF'S RECOMMENDATION THAT PUBLIC AND SEMI-PUBLIC MESSAGES BE RECLASSIFIED FROM CELL 2 TO CELL 1? (STAFF REPORT AT P. 55)

A: No. The Staff cites two reasons for its recommendation; public safety/universal service and degree of competition.

Public and semi-public telephones could be used to place an emergency (public safety) call, but there is no charge today for emergency calls made to 911 or to an operator, and classifying the current 25 cent message charge (which does not apply to these calls) in Cell 2 in no way changes or diminishes that fact. In addition, there are other ways of addressing the universal service issue, such as Telephone Service Assistance discussed earlier in this testimony. These are more appropriate than attempting to limit pricing flexibility on a competitive service.

The overriding fact is that public and semi-public telephone usage is competitive. There are competitive alternatives, including COCOTs, cellular and basic exchange service. While I did not deem the level of competition high enough to warrant Cell 4 classification, there clearly are adequate alternatives to Company provided public and semi-public service and Cell 2 is the appropriate classification.

19. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION TO RECLASSIFY DEDICATED DIGITAL SERVICES IN THE CLEVEOH62 AND CLMBOH11 WIRE CENTERS FROM CELL 4 TO CELL 2? (STAFF REPORT AT P. 56)

A: No. The testimony of Ms. Carol Kline and Exhibit 8 describe and discuss the competition for dedicated digital services in these wire centers. These wire centers today face a high degree of competition for dedicated digital services. Additional providers such as Time Warner AxS and TCG America, Inc., continue to announce plans or seek Commission certification to provide service in these areas. Cell 4 is the appropriate classification.

20. Q: DO YOU AGREE WITH THE STAFF'S PROPOSAL TO CLASSIFY ANY NEW SERVICE WHICH IS A CLOSE SUBSTITUTE OR CONTAINS BUNDLED ELEMENTS IN THE MOST RESTRICTIVE CELL? (STAFF REPORT AT P. 58)

- A: No. As long as customers have the option of purchasing the original service, they are not harmed by the presence of the substitute or bundled service. Therefore a blanket rule to restrictively classify the new service is unnecessary, undesirable and not required by the Commission's cell classification rules. It should therefore be rejected.
21. Q: DO YOU AGREE THAT THE RECLASSIFICATION OF A SERVICE TO CELL 4 SHOULD REQUIRE 30 DAYS NOTICE? (STAFF REPORT AT P. 61)
- A: No. Cell 4 services by definition are highly competitive and the Company has no incentive to reclassify a service to that cell unless it can demonstrate that fact to the Commission. Moreover, the Staff has ongoing oversight authority and will surely review any such application carefully. The marketplace, however, does not stand still while regulatory review takes place. Ameritech Ohio requires the same flexibility its competitors have if it is to have a meaningful opportunity to compete. If that meaningful opportunity is denied, customers will be harmed and the public interest will not be served.
22. Q: DO YOU AGREE WITH THE STAFF PROPOSAL TO ELIMINATE A SEPARATE CHARGE FOR TOUCH-TONE AND TO REDUCE THE PRICE TO \$1.25 PER LINE? (STAFF REPORT AT P. 66)

A: I agree that the separate Touch-Tone charge should be eliminated. While different from my proposal, the Staff recommendation is revenue neutral for residence customers in the aggregate and consequently acceptable. The Staff recommendation for business lines and trunks, however, is not revenue neutral. I proposed a revenue neutral plan for nonresidence Touch-Tone and I am willing to consider any revenue neutral plan for business customers. I know of no basis for Staff's proposed reduction in these prices and recognize that the Company will be harmed if they are lowered. The current Staff recommendation for business lines and trunks should be rejected.

23. Q: DO YOU AGREE WITH THE STAFF RECOMMENDATION THAT THE COMPANY MAKE MESSAGE RATE CENTREX SERVICE AVAILABLE FOR RESELLERS? (STAFF REPORT AT P. 81)

A: Yes. I have eliminated the requirement that resellers purchase measured rate service as part of this proceeding. That change is included in Exhibit 7, Section 2, page 16.1.

24. Q: DO YOU AGREE WITH THE STAFF'S RECOMMENDATION THAT CUSTOMERS WHO ELECT TO EXPAND OR MOVE THEIR CENTREX SYSTEM BE PERMITTED TO DO SO DURING THE FIRST TWELVE MONTHS OF THE PLAN WITHOUT ANY TERMINATION LIABILITY? (STAFF REPORT AT PP. 82-83)

A: No. The Advantage Ohio Plan allows customers to expand their existing systems for the twelve month period without incurring any termination liability. If, however, a customer wishes to move to a different location outside of his current wire center, that customer should be responsible for the Variable Term Payment Plan (VTPP) termination liabilities. Remember that the customer received a lower price as a result of the commitment to maintain service at that location for a period of time, with the clear tariff requirement that termination charges would apply if service was moved or discontinued during that period. Advantage Ohio does not change that agreement and the Staff offers no rationale for altering the tariff.

25. Q: DO YOU AGREE WITH THE STAFF'S TRANSFER OF SERVICE RECOMMENDATIONS? (STAFF REPORT AT 88-89).

A: No. The current tariff provisions are in place to help ensure that customers pay their bills. To order the Company to guarantee other parties at the same location the same telephone number without requiring outstanding indebtedness be fulfilled would be an open invitation

for residence customers to ignore their final bills or to routinely transfer service among a group of residents in order to avoid disconnection for nonpayment. Such a policy is contrary to the public interest.

Whether the maintenance of continuous service with the same telephone number is an essential portion of the good will asset of a business which is changing hands or not, that in no way relieves the original owner from his obligation to fulfill his indebtedness. The current requirements help ensure that any amounts owed to Ameritech Ohio are settled.

Of course, as with other collection issues, the Company policy has been to attempt to be flexible in extending payment terms and otherwise negotiating on a case by case basis with parties having difficulty paying their bills. I have no reason to expect this practice will not continue. Unfortunately the Staff recommendation opens the door to greatly increased fraud. This result is also totally inconsistent with the Staff recommendation that reclassifies Selective Call Screening to Cell 1 on the theory that call aggregators require this service to better control fraud. This transfer of service recommendation will result in

increased uncollectible revenues and consequently, harm the Company. It must be rejected.

26. Q: DO YOU AGREE WITH THE STAFF'S PROPOSAL TO ESTABLISH A NEW PUBLIC PAY STATION TELEPHONE SERVICE (STAFF REPORT AT 81-82)?

A: No. My proposal to disaggregate the network access line from the central office termination applies to all exchange lines, including those which COCOTs purchase from Ameritech Ohio today. The Staff is proposing an even greater unbundling, however, which would provide the COCOTs with the same functionality as Ameritech Ohio uses today. The current network design, however, will not support such unbundling. Public telephone features are integrated into our central offices on a bundled basis and the switch manufacturers do not offer the unbundled capability.

27. Q: WOULD IT BE APPROPRIATE TO OFFER COCOTS THE CURRENTLY AVAILABLE FUNCTIONALITY ON A BUNDLED BASIS?

A: No it would not. Ameritech Illinois introduced such a service in August, 1993. To date there are only two customers with a total of ten lines. I know of no demand for this service in Ohio that would make Ohio's experience any different from that in Illinois.

28. Q: DO YOU AGREE WITH THE STAFF'S RECOMMENDATION THAT THE COMPANY FILE ITS PROPOSED DISCOUNTED EDUCATIONAL TARIFFS PRIOR TO THE COMMISSION APPROVING ADVANTAGE OHIO? (STAFF REPORT AT P. 110).

A: Work is underway to finalize the educational tariff which will provide at least a \$1 million discount to state chartered primary and secondary schools. This tariff, which in the aggregate provides a discount of approximately 10 percent, will be provided prior to approval of Advantage Ohio.

In my direct testimony I also discussed an interactive video service tariff which will include discounts to qualified educational institutions. The Company is not presently providing this service under tariff and the tariff cannot be finalized until network design and cost issues are resolved. I am proposing that the tariff contain a provision which will provide educational institutions a 10 percent discount from the regular tariff rates.

29. Q: WHAT IS YOUR OPINION OF THE FIVE YEAR FREEZE RECOMMENDED BY NRRI FOR RESIDENCE SERVICES? (NRRI 7.6).

A: I disagree with the recommendation and note that the Staff did not adopt it. NRRI recommends that these prices be frozen "for the recommended five-year period

that price caps are in effect." This recommendation is not a price cap plan. Further, it ignores the fact that Advantage Ohio is not a plan of fixed, 5 year duration. The proposed three year commitment was formulated as a commitment to customers. The price regulation plan, which is central to the total Advantage Ohio plan, should be permitted to operate as it was designed. Unlike the NRRI recommendation, my proposal is in the public interest and should be accepted.

30. Q: HAS THE COMPANY INTRODUCED ANY NEW SERVICES SINCE THIS CASE WAS FILED ON JUNE 30, 1993?

A: Yes it has.

31. Q: WILL YOU AMEND YOUR CELL LISTS (ATTACHMENT 24.1 OF YOUR ORIGINAL DIRECT TESTIMONY) TO INCORPORATE THOSE SERVICES?

A: Yes. The Company has introduced several new services. In some cases, such as the introduction of new Centrex features, the existing cell list adequately describes the classification (all Centrex features are classified in Cell 4). There are three new services, however, which should be added to the cell lists. Dedicated 800 Service should be added to the list for Cell 4, consistent with the treatment of Custom 800 and 800 INWATS. Billed Number Screening and International

Call Blocking Service should be added to the list for Cell 3, consistent with the treatment of Toll Restriction and Selective Call Screening. These additions are listed on Attachment 24S.1.

32. Q: ARE YOU PROPOSING ANY CORRECTIONS TO EXHIBIT 3.0/4.0?

A: Yes, I am. I am updating selective pages of the exhibit to incorporate the new services introduced since the Plan was filed and to correct minor inconsistencies where Exhibit 3.0/4.0 did not agree with the cell lists contained in Attachment 24.1 of my direct testimony. This includes correcting the display for the directory assistance provided to interexchange carriers which was incorrectly included in the Exhibit in Cell 3. I am proposing that this form of directory assistance, like all other switched access, be classified in Cell 1.

In addition, the original exhibit inadvertently misstated the quantity of service connection charges in that it did not recognize the fact that only one service order charge will be imposed when multiple lines are installed on a single order. This change will have the effect of increasing the proposed base period revenue reduction associated with my pricing and price structure proposals by \$2.3 million million. These corrections are displayed on Attachment 24S.1.

33. Q: DOES THIS CONCLUDE YOUR TESTIMONY?

A: Yes, it does.

New Services - Cell Classifications

Service	Cell Classification	Service Groups
Dedicated 800 Service	4	Residence, NonResidence
Billed Number Screening Service	3	Residence, NonResidence
International Call Blocking Service	3	Residence, NonResidence

Clarification - Cell Classifications

Service	Cell Classification	Service Groups
Switched Access Service		
Directory Assistance Service	1	Carrier

Exhibit 3.0/4.0 Cell Corrections

Description	Cust Svc Grp	Page No.	Rate Code	Original Cell	Revised Cell
Directory Assistance	Carrier	32	All	3	1
CCSA Access Line Terminal	NonRes	43	9CS	1	2
Spl Conf Arr-Adl eqp Term CCSA	NonRes	44	CG7	1	2
Coin Tel Rotary Panel 2D1	NonRes	45	CTT13	1	3
Coin Tel Touch-Tone Panel 2D2	NonRes	45	CTT14	1	3
2001/3002 Conditioning - All	NonRes	52-53	QA_	1	2
D1 Cnd-2Pt Dplx No Switching - All	NonRes	53	QHA	1	2
CCSA Att Trunk Extender Ckt	NonRes	74	ZA5	3	2
Data Acc Arr-Auto/Voltage Intf	NonRes	79	CBS01	4	1
Jack Weatherproof-Cornl Vessels	NonRes	88	JK3	4	3
Jack OD-NFI-Hsg Furn by Telco	NonRes	88	JKT	4	3
Jacks - All	NonRes	101	RJ_ _ _	4	1

Exhibit 3.1/4.1 Quantity Revenue Corrections

Description	Page No.	Rate Code	Original Quantity	Revised Quantity	Filed Proposed Revenue	Revised Proposed Revenue	Original Annual Revenue Change	Revised Annual Revenue Change
Access NR S/Occasion Admin	1	ALB	15795	8824	\$4,833,270.00	\$2,700,144.00	0	(\$2,133,126.00)
Access NR C/Occasion Admin	1	ALB	1428	558	\$271,605.60	\$106,131.60	0	(\$165,474.00)