

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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DOCKETING DIVISION
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**

In the Matter of the Complaint of the
Office of the Consumers' Counsel,

Complainant,

Case No. **93-576-TP-CSS**

vs.

The Ohio Bell Telephone Company,

Respondent.

Prepared Testimony
of
Roger G. Montgomery
Telecommunications Division

Staff Exhibit 30

1 1. Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS
2 ADDRESS?

3 A. My name is Roger G. Montgomery. My business address is 180 East
4 Broad Street, Columbus, Ohio, 43266-0573.
5

6 2. Q. BY WHOM ARE YOU EMPLOYED?

7 A. I am employed by the Public Utilities Commission of Ohio.
8

9 3. Q. WHAT IS YOUR PRESENT POSITION WITH THE PUBLIC UTILITIES
10 COMMISSION OF OHIO?

11 A. My present position is Chief of the Rate Section in the Telecommuni-
12 cations Division.
13

14 4. Q. WOULD YOU BRIEFLY STATE YOUR EDUCATIONAL BACK-
15 GROUND AND WORK EXPERIENCE?

16 A. I graduated from Franklin University in 1973 with a Bachelor of Sci-
17 ence Degree that included a major in accounting. After graduation, I
18 started working for the Commission in May 1973 as a Staff Accountant
19 in the Accounts and Valuation Division. In January 1975 I became a
20 Senior Accountant, in January 1976 I became an Accounting Supervi-
21 sor of an Audit Team, in January 1977 I became a Team Leader, in
22 November 1979 I became a Project Leader, and in May 1982 I became
23 the Chief Accounting Officer of the Accounts and Valuation Division.
24 In July 1984 I accepted a temporary reassignment from the Accounts
25 and Valuation Division to the Telecommunications Division in my
26 current position. I later accepted a permanent transfer to the
27 Telecommunications Division in January 1985.

1
2 5. Q. MR. MONTGOMERY WHAT IS THE PURPOSE OF YOUR TESTI-
3 MONY?

4 A. I will generally respond to objections filed to the Staff Report associated
5 with the Staff's recommended Pro forma Adjustments, LRSIC, Imputa-
6 tion and Cross-Subsidization. I will also offer testimony on the rec-
7 ommended service specific rate changes which are intended to reflect
8 the Staff Report's range of recommended revenue requirement reduc-
9 tions.

10
11 6. Q. SPECIFICALLY WHICH OBJECTIONS WILL YOU BE ADDRESSING?

12 A. I will respond to Ameritech Ohio Objection G6, American Association
13 Of Retired Persons (AARP) Objections 7, 8, 20, 23 and 24, AT&T Objec-
14 tions 2 through 6, 8, and 9, City of Cleveland Objections 8 and 13,
15 Edgemont Neighborhood Coalition Objections 3, 17, 18, 19, 25 and 45,
16 Greater Cleveland Welfare Rights Organization Objections 5 and 14,
17 IXC Coalition Objections 4, 7, 9, 11 and 14, MCI Objections 3, 5, 6, 7, 9, 12,
18 13, NEW PAR COMPANIES Objection on Page 6, Office Of The Ohio
19 Consumers' Counsel (OCC) Objections 14, 19, 20, 22, 23, 35 and 45, Ohio
20 Library Council Objections 4 through 6, 7, 9, 10, 12 through 20, 22, 31, 32,
21 38 and 39, Ohio Newspaper Association Objections 2 through 5, 7, 8, 10
22 through 20, 29, 30, 36 and 37, The Ohio Cable Television Association
23 (OCTVA) Objections 20, 21, 23, 25 through 27, 54 through 62, 64, 65, 67,
24 68, 71 and 72, Sprint Objections 1, 2, 3 and 6, and Time Warner Objec-
25 tions III.1 and V.3.
26

1 7. Q. WOULD YOU BRIEFLY EXPLAIN WHAT IS SHOWN ON RGM
2 ATTACHMENT 1? (AARP 7 & 8, Cleveland 8, Edgemont 18 and 25, IXC
3 4, OCC 14, 23 and 35, Welfare 5 and 14)
4 A. Yes, RGM Attachment 1 lists the service specific revenue reductions or
5 the Staff's recommended pro forma adjustments for the Residence,
6 Non-Residence, and Carrier Access baskets.
7
8 8. Q. WOULD YOU PLEASE DESCRIBE THE SCHEDULE B TOLL
9 RESTRUCTURING REVENUE REDUCTION.
10 A. Ameritech Ohio made the same adjustment to its current adjusted base
11 year revenues. The Schedule B MTS rates, however, went into effect
12 after the base year or the twelve months ended September 30, 1993.
13 Schedule B was approved by the Commission in Case No. 93-353-TP-
14 ATA on September 23, 1993. The rates themselves did not go into
15 effect until December 1, 1993. The Staff has appropriately recognized
16 this rate decrease as a *pro forma* adjustment to the base year revenues.
17 The total revenue reduction associated with Schedule B calculated by
18 the Company is approximately \$10,500,000. I estimate the benefit to res-
19 idence subscribers to be approximately \$6,472,894 and \$4,027,106 for
20 non-residence subscribers.
21
22 9. Q. WOULD YOU PLEASE DESCRIBE THE DISAGGREGATION OF
23 EXCHANGE ACCESS REVENUE REDUCTION.
24 A. Staff witness Allen Francis describes in detail the restructuring associ-
25 ated with the disaggregation of residence and non-residence exchange
26 access. Except for the restructuring of Touch-Tone, Staff accepted the
27 exchange access rate restructuring proposed by Ameritech Ohio.

1 Accordingly, the Staff agrees with the disaggregation of exchange access
2 (exclusive of Touch-Tone) revenue reduction as determined by the
3 Company. The exchange access revenue reduction for non-residence is
4 approximately \$13,627,925.
5

6 10. Q. WOULD YOU PLEASE DESCRIBE THE STAFF RECOMMENDED
7 TOUCH-TONE/NAL REVENUE REDUCTION?

8 A. With the Touch-Tone/NAL recommendations made by Staff witness
9 Allen Francis, the Company would realize \$899,713 less from residence
10 customers and \$5,407,239 less from non-residence customers or approx-
11 imately \$6,306,952 in total. To Ameritech Ohio, the Staff's Touch-
12 Tone/NAL restructuring for the residence basket is largely revenue
13 neutral.
14

15 From the perspective of individual residence customers, however, the
16 Staff's Touch-Tone/NAL recommendation is not revenue neutral.
17 Approximately 76% of all residence customers have Touch-Tone
18 equipped lines. These customers on a per line basis would realize a
19 reduction of \$0.55 a month or \$6.60 a year. Approximately 24% of all
20 residence customers have rotary-pulse equipped lines. These cus-
21 tomers, on a per line basis (with either rotary-pulse or Touch-Tone
22 equipped lines), would realize an increase of \$1.25 a month or \$15.00 a
23 year.
24

25 The Staff's non-residence Touch-Tone/NAL restructuring for
26 Ameritech Ohio obviously is not revenue neutral. However, the Staff
27 recommended rate reductions to non-residence services for Touch-

1 Tone/NAL still result in rates for those services that are above their
2 respective LRSIC. Further, the non-residence Touch-Tone/NAL rev-
3 enue reductions do not place the non-residence Cell 1 services below
4 the group's Fully Distributed Cost (FDC), as determined by Staff witness
5 Nadia Soliman. The same cannot be said for the residence exchange
6 access services in question. The Staff generally does not support
7 decreasing rates for services that are below their LRSIC. I will address
8 later in my testimony the recommended rate decreases for the resi-
9 dence basket.

10
11 11. Q. WOULD YOU PLEASE DESCRIBE THE STAFF RECOMMENDED
12 INTRASTATE CCLC REVENUE REDUCTIONS?

13 A. Staff recommends that Ameritech Ohio's originating and terminating
14 intrastate Carrier Common Line Charge be reduced to zero and,
15 thereby, eliminated as a rate element. In support of this recommenda-
16 tion the Staff cites the Company's present earnings level and the Staff's
17 rate design objective of reducing the substantial disparity between local
18 and toll usage charges. Additionally, the Staff believes that the elimi-
19 nation of the intrastate CCLC will largely address the existing disparity
20 between the Applicant's terminating compensation agreements while
21 also establishing a rational basis for Alternative Exchange Provider
22 terminating compensation.

23
24 12. Q. WOULD YOU PLEASE DESCRIBE THE STAFF RECOMMENDED DID
25 USAGE CHARGES REVENUE REDUCTION AND THE DID CHANGE
26 CHARGE REVENUE REDUCTION?

1 A. Prior to October 22, 1991, the Company had in place tariff regulations
2 which prohibited customers from mixing different usage packages for
3 service provided to the same premises. The intent had been to stop
4 customers from purchasing a measured form of usage for inward traffic
5 and a flat or message usage package for its outbound traffic. As a result
6 of this prohibition, there are numerous customers with PBX trunks
7 who are paying a \$10.00 non-residence monthly message usage charge
8 for trunks with DID service which are configured only for inbound
9 traffic. As these trunks are incapable of making outgoing calls, the Staff
10 is of the opinion that they should not be assessed any usage charges. To
11 remedy this the Staff recommends, in light of the Company's prior
12 elimination of the prohibition on the mixing of usage packages, that
13 any existing message rate DID trunks (which are configured for inward
14 only service) be converted to measured service. This would eliminate
15 the \$10.00 monthly message usage charge and result in a revenue
16 reduction of approximately \$2,972,280.

17
18 Additionally, the Staff recommends that Ameritech Ohio waive the
19 \$41.55 (the current rate) per trunk conversion charge associated with
20 this recommendation, thus, resulting in an additional reduction of
21 approximately \$1,029,152 in annual revenues.

22
23 13. Q. WOULD YOU PLEASE INDICATE WHY THE STAFF WOULD LIKE
24 TO SIMPLIFY AMERITECH OHIO'S LOCAL MEASURED RATE SER-
25 VICE?

26 A. The Company's service, which is tariffed as Measured Rate Service and
27 marketed as their Flexible Call Plan, has a toll-like rate structure where

calls are rated by duration of the call, distance, and time of day. The peak daytime charges are as follows:

Usage Rate Chart

Mileage Bands	Initial Minute	Add'l Minute	Calls placed at night, on weekends, or on holidays are discounted 50% from the peak daytime rates.
0-11	4	1	
11-22	4.5	1.5	
23 & over	5	2	

This toll-like rate structure has been the traditional design adopted for local measured services. This rate design, however, is complex to the average subscriber. Specifically, customers find it difficult to determine what rates apply on a per call basis.

Ameritech Ohio also provides a similar local service entitled "Extended Measured Rate Service" (EMRS), which is marketed as Minute Line. Minute Line, as opposed to the Flexible Call Plan, has a more simplified rate structure. The Minute Line rate structure for local calls is 1.5 cents per minute, with a 50% discount applied to completed calls made in the off peak hours. Minute Line currently is provided to residence customers only. Upon subscribing to Minute Line a customer is also placed on Ohio Bell's Schedule C intraLATA toll plan.

1 As the costs for call completion and some distance-related services
2 have experienced reductions over time, combined with the customer
3 confusion associated with the complex Flexible Call Plan, the Staff is of
4 the opinion this service is outmoded and is no longer a viable service
5 offering. Therefore, the Staff proposes merging the Flexible Call Plan
6 and Minute Line services and applying the simplified \$.015 Minute
7 Line rate for both services. This new optional local calling plan should
8 be available to both residential and non-residential customers. Staff
9 would also recommend that these customers be permitted to subscribe
10 to any toll plan provided by the company. The former Measured Rate
11 Service rate structure, however, should be maintained as Local Mea-
12 sured Service Plus, and available for Commission use with measured
13 Extended Area Service (EAS) calling. The annual revenue impact,
14 before adjustment for uncollectibles, for the new simplified local call-
15 ing service results in a revenue reduction of approximately \$1,023,443
16 for residence and \$315,210 for non-residence or \$1,338,653 in total.
17

18 14. Q. WOULD YOU PLEASE DESCRIBE THE STAFF RECOMMENDED
19 REVENUE REDUCTIONS ASSOCIATED WITH CALL FORWARD-
20 ING, THREE-WAY CALLING, AND CALL WAITING? (Edgemont 45
21 and OCC 45)

22 A. Pursuant to the Staff's recommendations on cell classifications,
23 Ameritech Ohio's custom calling services are placed in Cell 3. These
24 services are comprised of Call Forwarding, Three-way Calling, and Call
25 Waiting Features. Call Forwarding permits a customer to transfer
26 incoming calls to another central office line. Three-way Calling per-
27 mits the customer to add a third party to an existing connection, estab-

1 lishing a three-way conference call. Call Waiting permits the customer,
2 upon receipt of a tone signal indicating that a call is waiting, to place
3 the existing call on hold and answer the second call.

4
5 Staff is of the opinion that the prices for custom calling services are
6 well above cost and recommends significantly reducing the rates
7 charged for the specified services. Further, consistent with the Appli-
8 cant's assertion in the pricing of network access lines that the cost of
9 providing network access lines is the same for both residential and
10 non-residential subscribers, Staff recommends that the new rates pro-
11 posed for these custom calling services should be uniform for both res-
12 idential and business customers. The Staff proposes that the residence
13 and non-residence rates for Call Forwarding, Three-way Calling, and
14 Call Waiting be reduced to \$1.50. As a result of the Staff's proposed
15 reductions for these custom calling services, the Company's annual
16 revenues will be reduced by approximately \$37,085,277 in total, with
17 residence receiving a reduction of approximately \$32,704,597 and non-
18 residence approximately \$4,380,680.

19
20 15. Q. WHY IS IT APPROPRIATE TO DECREASE RESIDENCE SERVICES IN
21 CELL 3 RATHER THAN THE RESIDENCE SERVICES IN CELL 1?

22 A. According to the Staff's fully distributed cost results (FDC), the rev-
23 enues generated from the Cell 1 residence services are less than their
24 fully distributed costs. Any additional reductions to residence Cell 1
25 services would only make the gap that much bigger. The Company's
26 LRSIC studies on exchange access also indicate similar findings as did
27 the Staff's FDC study, further suggesting no large reductions to resi-

1 dence Cell 1 services should be made. The Staff's recommended Cell 3
2 reductions, as I stated earlier, were primarily based upon our opinion
3 that the prices for custom calling services are well above their cost.
4

5 16. Q. MS. SOLIMAN, IN HER ATTACHMENT 3, CALCULATED THE FDC
6 FOR CELL 1 AS WELL AS THE RESPECTIVE REVENUES. USING MS.
7 SOLIMAN'S ATTACHMENT, WHAT WERE THE FDC RESULTS FOR
8 CELL 1 AND HOW DOES THAT COMPARE WITH THE *PRO FORMA*
9 ADJUSTMENTS TO CELL 1 YOU HAVE PREVIOUSLY MENTIONED?

10 A. The dollars below are rounded to the nearest one thousand:
11

	NADIA SOLIMAN ATTACH 3	STAFF'S PRO FORMA ADJUST'S	ADJUSTED BALANCE
Cell 1 Residence			
FDC	\$755,639		\$755,639
Base Yr. Oper. Rev.	\$560,982	(\$ 1,923)	\$558,980
Total	(\$194,736)	(\$ 1,923)	(\$192,734)
Cell 1 Non-Residence			
FDC	\$358,885		\$358,885
Base Yr. Oper. Rev.	\$586,191	(\$23,352)	\$562,839
Total	\$227,306	(\$23,352)	\$203,954
Cell 1 Carrier Access			
FDC	\$ 88,859		\$ 88,859
Base Yr. Oper. Rev.	\$137,524	(\$28,981)	\$108,543
Total	\$ 48,665	(\$28,981)	\$ 19,684
Cell 1 TOTAL			
FDC	\$1,203,383		\$1,203,383
Base Yr. Oper. Rev.	\$1,284,697	(\$54,256)	\$1,230,441
Total	\$ 81,314	(\$54,256)	\$ 27,058

17. Q. IN THE WRITTEN TESTIMONY OF NADIA SOLIMAN, THE STAFF RECOMMENDS THE FDC FOR ALL CELL 1 SERVICES SHOULD BE USED AS A REVENUE CEILING. MR. MONTGOMERY, BASED ON THE STAFF'S FDC CELL 1 CEILING RECOMMENDATION, ARE THERE ADDITIONAL SERVICE SPECIFIC *PRO FORMA* ADJUSTMENTS THE STAFF WOULD RECOMMEND?

A. We have not identified any further service specific pro forma adjustments. However, the Staff would recommend a Consumer Dividend Adjustment of approximately \$27.058 million be made to Cell 1 Non-Residence or Cell 1 Carrier Access services.

1
2 18. Q. MR. MONTGOMERY, IF REVENUE REDUCTIONS IN EXCESS OF
3 \$128.9 MILLION WERE MADE IN THIS PROCEEDING, WHAT PRO
4 FORMA ADJUSTMENT OR ADJUSTMENTS WOULD THE STAFF
5 RECOMMEND?
6 A. The Staff recommends if any further revenue reductions are required
7 they could be accomplished with a Consumer Dividend Adjustment to
8 either Cell 2 or Cell 3 services.
9
10 19. Q. MR. MONTGOMERY, IF REVENUE REDUCTIONS OF LESS THAN
11 \$128.9 MILLION WERE MADE IN THIS PROCEEDING, WHAT PRO
12 FORMA ADJUSTMENT OR ADJUSTMENTS WOULD THE STAFF
13 RECOMMEND?
14 A. If less than \$128.9 million, we would reduce the proposed Cell 3 ad-
15 justments but the first revenue reductions would be made to Cell 1
16 services of up to \$81.3 million.
17
18 20. Q. MR. MONTGOMERY WOULD YOU PLEASE DESCRIBE YOUR RGM
19 ATTACHMENT 2?
20 A. For the residence basket, RGM Attachment 2 shows the percentage and
21 dollar breakdown by the Staff's Cell 1 rate cap category and by cell. Col-
22 umn (A), the first of the dollar columns was taken from Ohio Bell
23 Exhibit 3.1/4.1, and shows the Company's current price caps revenue
24 base excluding Cell 4 before any pro forma adjustments. Column (C)
25 lists the Staff's recommended residence pro forma adjustments taken
26 from RGM Attachment 1 and matching them with the individual line
27 items. Column (E) is derived from Column (A) plus Column (C) and

1 represents the Staff's adjusted pro forma revenues. The primary pur-
2 pose of this attachment is to illustrate the dollars subject to the various
3 pricing parameters for the residence basket.
4

5 21. Q. WHAT PERCENTAGE OF THE RESIDENCE PRICE CAP REVENUE
6 BASE WOULD BE SUBJECT TO A RATE CAP FOR THREE YEARS
7 BASED UPON THE STAFF'S RECOMMENDATION?

8 A. On RGM Attachment 2 in Column (E), the dollars associated with rates
9 that are capped for a duration of three years is 76% of the total residence
10 price cap revenue base.
11

12 22. Q. WHAT IS THE PERCENTAGE OF REVENUES FROM CELL 1 RESI-
13 DENCE SERVICES TO THE TOTAL RESIDENCE PRICE CAP REV-
14 ENUE BASE?

15 A. Approximately 80% of all the residence basket revenues are derived
16 from Cell 1 residence services. Cell 1, of course, is the most restrictive
17 pricing cell.
18

19 23. Q. IN YEAR 2 OF THE PLAN, WHAT PERCENTAGE OF THE RESI-
20 DENCE BASKET TO THE TOTAL RESIDENCE PRICE CAP REVENUE
21 BASE COULD BE INCREASED PURSUANT TO THE PROPOSED
22 PRICE CAP PARAMETERS?

23 A. On RGM Attachment 2 in Column (E), the total residence basket dol-
24 lars that would be available for an increase in rates represents approx-
25 imately 24% of the total residence price cap revenue base. The overall
26 price cap revenue base for the Company, however, may only increase if
27 the price cap formula is positive. Otherwise, rate increases generating

1 additional revenues from Cell 1 other, Cell 2 and Cell 3 must be
2 accommodated with an equal revenue decrease to the remaining 76%
3 of the residence price cap base revenues.
4

5 24. Q. MR. MONTGOMERY WOULD YOU PLEASE DESCRIBE YOUR RGM
6 ATTACHMENT 3?

7 A. For the non-residence basket, RGM Attachment 3 shows the percentage
8 and dollar breakdown by the Staff's Cell 1 rate cap category and by cell.
9 Column (A) was taken from Ohio Bell Exhibit 3.1/4.1, and shows the
10 Company's current price caps revenue base excluding Cell 4 before any
11 pro forma adjustments. Column (C) lists the Staff's recommended
12 non-residence pro forma adjustments taken from RGM Attachment 1
13 and matches them with the individual line items. Column (E) is
14 derived from Column (A) plus Column (C) and represents the Staff's
15 adjusted pro forma revenues. The primary purpose of this attachment
16 is to illustrate the dollars subject to the various pricing parameters for
17 the non-residence basket.
18

19 25. Q. THE STAFF HAS RECOMMENDED CERTAIN SERVICES BE CLASSI-
20 FIED IN DIFFERENT CELLS THAN WHAT AMERITECH OHIO HAS
21 PROPOSED. DO THE INDIVIDUAL LINE ITEMS ON RGM
22 ATTACHMENT 3 LIST ALL OF THESE SERVICES IN THEIR DIFFER-
23 ENT CELL CLASSIFICATIONS AS RECOMMENDED BY THE STAFF?
24

25 A. All of the major services with significant revenue streams that differ
26 from the Company's proposal are shown on the attachment. However,
27 for the following digital services for which the Staff recommends Cell 2

1 classification rather than Cell 4, the dollars have not been reclassified
2 for purposes of this attachment:
3

4 Digital Private Line - Columbus & Cleveland

5 Digital Specialized Network Services - Columbus & Cleveland

6 Digital Local Distribution Channels
7

8 Also, the revenues, if any, for ISDN Prime access for purposes of RGM
9 Attachment 3 have not been reclassified from Cell 3 to Cell 1. The rev-
10 enues for all of these services mentioned were not easily identifiable
11 and were considered to be insignificant for purposes of this attachment.
12

13 26. Q. WHAT PERCENTAGE OF THE RESIDENCE PRICE CAP REVENUE
14 BASE WOULD BE SUBJECT TO A RATE CAP FOR THREE YEARS
15 BASED UPON THE STAFF'S RECOMMENDATION?

16 A. On RGM Attachment 3 in Column (E), the dollars associated with rates
17 that are capped for a duration of three years is approximately 75% of the
18 total non-residence price cap revenue base.
19

20 27. Q. WHAT IS THE PERCENTAGE OF REVENUES FROM CELL 1 NON-
21 RESIDENCE SERVICES TO THE TOTAL NON-RESIDENCE PRICE
22 CAP REVENUE BASE?

23 A. Approximately 88% of all the non-residence basket revenues are
24 derived from Cell 1 non-residence services. Cell 1, of course, is the
25 most restrictive pricing cell.
26

1 28. Q. IN YEAR 2 OF THE PLAN, WHAT PERCENTAGE OF THE NON-RES-
2 IDENCE BASKET TO THE TOTAL NON-RESIDENCE PRICE CAP
3 REVENUE BASE COULD BE INCREASED PURSUANT TO THE PRO-
4 POSED PRICE CAP PARAMETERS?

5 A. On RGM Attachment 3 in Column (E), the total non-residence basket
6 dollars that would be available for an increase in rates represents
7 approximately 25% of the total non-residence price cap revenue base.
8 The overall price cap revenue base for the Company, however, may
9 only increase if the price cap formula is positive. Otherwise, rate
10 increases generating additional revenues from Cell 1 other, Cell 2 and
11 Cell 3 must be accommodated with an equal revenue decrease to the
12 remaining 75% of the non-residence price cap base revenues.
13

14 29. Q. WHAT ARE THE ANNUAL INDIVIDUAL SERVICE CEILING
15 REQUIREMENTS RECOMMENDED BY STAFF FOR CELL 1, CELL 2
16 AND CELL 3?

17 A. In the Staff Report, we recommended that rate increases for individual
18 Cell 1 residence and non-residence services would be no greater than
19 5% per year in addition to the price cap index for that year. Staff wit-
20 ness Shields amended that position to reflect that annual price
21 increases for Cell 1 services should not exceed 5% or 5% plus the PCI,
22 whichever is higher. The ceiling limits for Cell 2 and Cell 3 were also
23 amended by Mr. Shields in his testimony allowing a 20% upward max-
24 imum annual pricing flexibility. Mr. Shields further recommends, in
25 the event the Company achieves Milestone 2, the annual pricing flexi-
26 bility would be set at 30% upward.
27

1 30. Q. WHAT ARE THE INDIVIDUAL SERVICE FLOOR REQUIREMENTS
2 PROPOSED BY STAFF FOR CELL 2 AND CELL 3?

3 A. Staff proposes the same downward pricing flexibility as I described
4 above for the upward pricing flexibility. Additionally, with new ser-
5 vices and with price changes to existing services in Cell 2 and Cell 3, the
6 Company is required to submit a cost study thereby establishing a cost
7 based floor for that service.
8

9 31. Q. PER THE STAFF'S RECOMMENDATIONS, WHEN IS THE COM-
10 PANY REQUIRED TO SUBMIT A COST STUDY TO ESTABLISH A
11 COST BASED FLOOR FOR THAT SERVICE? (Ameritech G6, AARP 24,
12 Cleveland 13, Edgemont 19, IXC 7, Library 38, Newspaper 8 & 36, OCC
13 22, OCTVA 20 and 27, Time Warner III.1)

14 A. When the rate for a Cell 1 service is decreased, when the rate for an
15 existing Cell 2 or Cell 3 service is changed, when an existing service is
16 reclassified to Cell 4, and when a new service is filed. Also, if the
17 Company seeks to move the price of an individual service outside its
18 current pricing parameters, thereby establishing new pricing parame-
19 ters, a cost study would be required.
20

21 32. Q. WOULD YOU PLEASE DESCRIBE WHAT IS LONG-RUN SERVICE
22 INCREMENTAL COST OR LRSIC? (Library 10,16,18,19,21,22,23, and 39,
23 MCI 12, Newspaper 14,16,17,19,20 and 37, OCTVA 21,25,55,56,59,61 and
24 62)

25 A. In the Commission's Rules For Alternative Regulation Of large Local
26 Exchange Companies, for a new or an existing product, the LRSIC is
27 equal to the per unit cost of increasing the volume of production from

1 zero to a specified level, while holding all other product and service
2 volumes constant.

3
4 33. Q. ARE COMMON OVERHEADS INCLUDED IN LRSIC?

5 A. No, they are not.
6

7 34. Q. IN GENERAL TERMS, WOULD YOU PLEASE DESCRIBE COMMON
8 OVERHEADS?

9 A. Common overheads generally are services or materials that are not
10 readily identifiable with individual product service units. Common
11 overheads as a general rule are incurred by the company as a whole.
12 Overhead costs therefore cannot, as a practical matter, be traced directly
13 to individual costing units. That being the case, there is no acceptable
14 method of direct measurement available.
15

16 35. Q. WOULD YOU PLEASE DESCRIBE LRSIC PLUS AS PROPOSED BY THE
17 STAFF? (Library 6,13 and 14, Newspaper 4,11 and 12, OCTVA 54,64,65
18 and 68)

19 A. Staff proposes to add 10% to the LRSIC of an individual service in
20 either Cell 2, Cell 3 or Cell 4. Since overhead costs cannot be directly
21 assigned, the plus or 10% represents an allocation of the common
22 overheads.
23

24 36. Q. IN GENERAL TERMS, WOULD YOU PLEASE DESCRIBE WHAT ARE
25 FAMILY COSTS AND INDICATE IF JOINT COSTS ARE THE SAME
26 AS FAMILY COSTS?

1 A. Family costs are incurred jointly or shared among a group of services
2 that cannot be directly assigned to individual services within the fam-
3 ily. Right-to-use fees associated with central office software serving a
4 particular family of products is a classic example of joint or shared
5 costs. Finally, when we describe joint costs we are using it in the same
6 context as a family cost.

7
8 37. Q. IN GENERAL TERMS, WHAT IS THE TOTAL INCREMENTAL COST
9 TEST AS PROPOSED BY AMERITECH OHIO?

10 A. It is an additional test to LRSIC which addresses the issue of family
11 costs. A separate study on a family of products joint or shared costs is
12 performed. The TIC test in the aggregate measures the family of prod-
13 ucts LRSIC and their joint costs, and compares these costs to the total
14 revenues of those services to determine whether the total revenues
15 exceeds the total incremental cost.

16
17 38. Q. WHAT ADDITIONAL RECOMMENDATIONS WOULD YOU MAKE
18 WITH REGARDS TO THE COMPANY'S TIC TEST? (Library 15,17 and
19 20, Newspaper 13,15 and 18, OCTVA 26,57,58,60 and 67)

20 A. That LRSIC Plus, as described above, be used rather than LRSIC unless
21 the 10% plus requirement is waived by the Commission. Also, the
22 Staff recommends any family of products joint or shared costs be allo-
23 cated in some reasonable fashion to individual services.

24
25 39. Q. WHY DO YOU BELIEVE THE FAMILY COSTS SHOULD BE ALLO-
26 CATED TO THE INDIVIDUAL SERVICES?

1 A. I believe it is essential given the individual service price cap pricing
2 parameters, coupled with the short timeframe available for review.
3 We need not unduly complicate matters with a review of all the ser-
4 vices associated with a family rather than a focused review on an indi-
5 vidual service.
6

7 40. Q. WITH THE CHANGES YOU HAVE DESCRIBED ABOVE, DO YOU
8 BELIEVE THE LRSIC METHODOLOGY PROPOSED BY THE COM-
9 PANY IS REASONABLE? (AARP 23)

10 A. Yes.
11

12 41. Q. DO YOU BELIEVE THAT STAFF SHOULD RECOMMEND THAT THE
13 COMMISSION MAKE LRSIC STUDIES DATA AVAILABLE TO ALL
14 PARTIES?

15 A. Staff believes that there is information contained in LRSIC studies
16 which is of a proprietary nature. Therefore, we believe that parties
17 other than staff should be given access to this information only if a
18 process can be devised which recognizes and protects the proprietary
19 nature of the information.
20

21 42. Q. MR. MONTGOMERY, DO YOU BELIEVE IT IS NECESSARY TO
22 REQUIRE SEPARATE SUBSIDIARIES TO BE PART OF THE COMPA-
23 NY'S PLAN? (AARP 20, Library 4,5,9 and 12, Newspaper 2,3,7 and 10,
24 OCC 19)

25 A. No.
26

1 43. Q. WHAT BENEFITS ARE DERIVED FROM THE ESTABLISHMENT OF
2 SEPARATE RESIDENCE, NON-RESIDENCE, AND CARRIER ACCESS
3 BASKETS AS WELL AS THE EXCLUSION OF CELL 4 FROM THE RES-
4 IDENCE AND NON-RESIDENCE BASKETS PROVIDE? (Edgemont 17,
5 Library 1, OCC 20, OCTVA 23)

6 A. The removal of Cell 4 services from the residence and non-residence
7 baskets will ensure that Cell 4 rate decreases will not be offset by rate
8 increases in the Company's less competitive service offerings. Like-
9 wise, in maintaining the three separate baskets (Residence, Non-Resi-
10 dence, and Carrier) rate changes to one basket will not be offset with
11 rate changes in another basket. Each basket has its own price cap.
12

13 44. Q. MR. MONTGOMERY, WOULD YOU PLEASE COMMENT ON THE
14 ISSUE OF USING CELL 1 SERVICES TO CROSS-SUBSIDIZE SERVICES
15 OR PRODUCTS OUTSIDE OF CELL 1 AND IN GENERAL, SAFE-
16 GUARDS THAT MINIMIZE THE POTENTIAL OF CROSS-SUBSI-
17 DIZATION.

18 A. I believe the Staff has made numerous recommendations, specifically
19 as they relate to Cell 1, that provide adequate cross-subsidization safe-
20 guards. I also believe, with the recommendation made by the Staff,
21 adequate cross-subsidization safeguards would be in place overall.
22 However, I do not believe it would be appropriate or necessary to vir-
23 tually remove all pricing flexibility sought by the Company to mini-
24 mize cross-subsidization. The following is a list of recommendations
25 the Staff is supporting that reduces the ability of the Company to cross-
26 subsidize its products in an anticompetitive fashion:
27

1 Threshold Rate Reductions
2 FDC Ceiling for Cell 1 with Annual Updates
3 Capped Rates of Specific Cell 1 Services for Three Years
4 Individual Service Pricing Parameters
5 Residence Basket, Price Cap Revenue Ceiling
6 Non-Residence Baskets, Price Cap Revenue Ceiling
7 Carrier Access Rates Mirror Interstate
8 Exclusion of Cell 4 Services from the Price Cap Baskets
9 Cost Based Floor Requirement for Individual Service
10 LRSIC Plus 10%
11 Allocation of Family Costs
12 Imputation
13 Milestone Recommendations Associated with Barrier's to Com-
14 petition
15

16 45. Q. MR. MONTGOMERY WOULD YOU PLEASE DESCRIBE YOUR RGM
17 ATTACHMENT 4? (AT&T 3,4,5 and 6, IXC 9 and 11, Library 7, MCI
18 3,5,6,7,9 and 13, Newspaper 5, OCTVA 71, Sprint 1,2 and 3)

19 A. RGM Attachment 4 provides the Staff's amended position on imputa-
20 tion. The introduction explains that imputation applies to Ameritech
21 Ohio for service components relied upon in provisioning other
22 telecommunication providers' services when the comparable service
23 offered by other providers rely upon non-competitive services or ser-
24 vice components provided by the Company. The policy on imputation
25 for Ameritech Ohio in this proceeding, however, does not apply to the
26 services which are subject to the proposed three year rate cap during
27 the period their rates are capped.

1 46. Q. ARE THE SERVICES PROVIDING EXTENDED AREA SERVICE (EAS)
2 SUCH AS LOCAL CALLING PLUS SUBJECT TO THE STAFF'S THREE
3 YEAR RATE CAP?

4 A. No, they are not.
5

6 47. Q. SHOULD IMPUTATION BE APPLIED TO LOCAL CALLING PLUS OR
7 OTHER EAS TYPE SERVICES?

8 A. EAS is a remedy to a customer complaint that a local calling area is
9 inadequate. Thus, as a matter of policy, EAS has been considered a
10 local service and has been priced as such. To require EAS rates to pass
11 an imputation test would, in my opinion, require a determination by
12 the Commission that imputation for EAS was appropriate as a matter
13 of public policy. It is my understanding a workshop is to take place
14 later this year where issues like this may be addressed.
15

16 48. Q. WOULD YOU CLARIFY STAFF'S POSITION WITH REGARD TO THE
17 AT&T OBJECTION 8 TO STAFF'S MISCHARACTERIZATION OF
18 AMERITECH OHIO'S PROPOSAL FOR RESALE AND SHARING?

19 A: Staff would like to modify its characterization of the Ameritech Ohio
20 proposal for resale and sharing. Staff's original position stated that
21 Ameritech Ohio was retaining its resale and sharing provisions cur-
22 rently tarified with the Commission. However, based on the testimony
23 of Mr. McKenzie, Ameritech Ohio is proposing to change the resale
24 and sharing provisions of its current tariff to include private line ser-
25 vices and non-residence vertical services. Previously, these services
26 were not available for resale and sharing. Staff would agree that the

1 Staff Report language regarding Ameritech Ohio's resale and sharing
2 proposal is a mischaracterization.

3
4 Nonetheless, after reviewing the Company's revised proposal based on
5 Mr. McKenzie's testimony, the Staff is of the opinion that such pro-
6 posal is reasonable, and recommends its approval as revised.

7
8 49. Q. IN THEIR OBJECTION 9, AT&T CLAIMS THE STAFF SHOULD HAVE
9 REJECTED MR. MCKENZIE'S RECOMMENDATION THAT
10 EXCLUDES MESSAGE RATE FOREIGN EXCHANGE SERVICE FROM
11 ITS RESALE AND SHARING PROVISIONS. WOULD YOU PLEASE
12 COMMENT ON THIS OBJECTION?

13 A. I believe AT&T's request, in essence, seeks to provided resale and shar-
14 ing provisions of a switched nature between two different exchanges. I
15 am advised by my legal counsel that the March 10, 1994 Order On
16 Rehearing in Case No. 93-1370-TP-ACE for Time Warner AxS of West-
17 ern Ohio, L.P., the Commission indicated it would need to address a
18 multitude of new issues before rendering a decision of this nature.
19 Until the Commission establishes new policy, Mr. McKenzie's recom-
20 mendation, as proposed, should stand.

21
22 50. Q. IXC COALITION OBJECTION 14 AND NEW PAR OBJECTIONS AT
23 PAGE 10 ALSO ADDRESSES RESALE AND SHARING. WOULD YOU
24 PLEASE COMMENT ON THIS OBJECTION?

25 A. I believe my responses to AT&T Objection 8 and 9 respond to these
26 objections as well.

1 51. Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2 A. Yes, it does.

The Ohio Bell Telephone Company
Case No. 93-487-TP-ALT
Staff's Proforma Adjustments

	<u>Residence</u> (A)	<u>Non-Residence</u> (B)	<u>Carrier</u> (C)	<u>Total</u> (D=A+B+C)
Schedule B Toll Restructure	\$ (6,472,894)	\$ (4,027,106)	\$	\$ (10,500,000)
Disaggregation of Exchange Access		(13,627,925)		(13,627,925)
Touch-Tone/NAL (Incl. Non-Rec.)	(899,713)	(5,407,239)		(6,306,952)
Intrastate:				
CCLC Prem. Orig			(13,873,486)	(13,873,486)
CCLC Prem. Term			(15,095,601)	(15,095,601)
CCLC Non-Prem. Orig.			(5,744)	(5,744)
CCLC Non-Prem. Term.			(6,596)	(6,596)
DID Usage Charges		(2,972,280)		(2,972,280)
DID Change Charges		(1,029,152)		(1,029,152)
Simplified Flexible Call Plan	(1,023,443)	(315,210)		(1,338,653)
Call Forwarding	(1,220,023)	(1,026,671)		(2,246,694)
Three-Way Calling	(2,247,736)	(199,492)		(2,447,228)
Call Waiting	<u>(29,236,838)</u>	<u>(3,154,517)</u>		<u>(32,391,355)</u>
Total Proforma Adjustments	<u>\$ (41,100,647)</u>	<u>\$ (31,759,592)</u>	<u>\$ (28,981,427)</u>	<u>\$ (101,841,666)</u>
Revenue Distribution	<u>40.4%</u>	<u>31.2%</u>	<u>28.5%</u>	<u>100.0%</u>

Ohio Bell Telephone Company
Case No. 93-487-TP-ALT
Residence Price Cap Basket
 (000's Omitted)

	Current Price Cap Revenues (A)	% (B)	Staff Proforma Adjustments (C)	% (D)	Staff Proforma Revenues (E=A+C)	% (F)
<u>Residence:</u>						
3 Yr. Rate Cap	\$ 301,654	45.8%	\$ (1,923)	4.7%	\$ 299,731	48.5%
Flat Rate	<u>171,246</u>	<u>26.0</u>	<u> </u>	<u> </u>	<u>171,246</u>	<u>27.7</u>
Staff Rate Cap	472,900	71.8	(1,923)	4.7	470,977	76.2
Other Cell 1	17,752	2.7			17,752	2.9
DA Local	5,846	0.9			5,846	0.9
DA Toll	<u>1,622</u>	<u>0.2</u>	<u> </u>	<u> </u>	<u>1,622</u>	<u>0.3</u>
Staff Other Cell 1	25,220	3.8	0	0.0	25,220	4.1
Cell 1	<u>498,120</u>	<u>75.6</u>	<u>(1,923)</u>	<u>4.7</u>	<u>496,197</u>	<u>80.3</u>
Cell 2	91,054	13.8	(6,473)	15.7	84,581	13.7
Cell 3	69,742	10.6	(32,705)	79.6	37,037	6.0
Cell 4	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Res Price Cap Base	<u>\$ 658,916</u>	<u>100.0%</u>	<u>\$ (41,101)</u>	<u>100.0%</u>	<u>\$ 617,815</u>	<u>100.0%</u>

Ohio Bell Telephone Company
Case No. 93-487-TP-ALT
Non-Residence Price Cap Basket
 (000's Omitted)

	Current Price Cap Revenues (A)	% (B)	Staff Proforma Adjustments (C)	% (D)	Staff Proforma Revenues (E=A+C)	% (F)
<u>Non-Residence:</u>						
3 Yr. Rate Cap	\$ 411,571	67.1%	\$ (23,352)	73.5%	\$ 388,219	66.8%
Public Coin Messages	40,510	6.6			40,510	7.0
Semi-Public Coin	<u>4,497</u>	<u>0.7</u>	<u> </u>	<u> </u>	<u>4,497</u>	<u>0.8</u>
Staff Rate Cap	456,578	74.5	(23,352)	73.5	433,226	74.5
Other Cell 1	63,227	10.3			63,227	10.9
DA Local	11,725	1.9			11,725	2.0
DA Toll	809	0.1			809	0.1
Selective Call Screen	<u>187</u>	<u> </u>	<u> </u>	<u> </u>	<u>187</u>	<u> </u>
Staff Other Cell 1	75,948	12.4	0	0.0	75,948	13.1
Cell 1	<u>532,526</u>	<u>86.9</u>	<u>(23,352)</u>	<u>73.5</u>	<u>509,174</u>	<u>87.6</u>
Cell 2	70,540	11.5	(4,027)	12.7	66,513	11.4
Cell 3	10,013	1.6	(4,381)	13.8	5,633	1.0
Cell 4	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Non-Res Price Cap Base	<u>\$ 613,079</u>	<u>100.0%</u>	<u>\$ (31,760)</u>	<u>100.0%</u>	<u>\$ 581,320</u>	<u>100.0%</u>

IMPUTATION PROPOSAL

I. INTRODUCTION

This requirement applies to Ameritech Ohio as a telecommunications carrier that provides both Cell 4 and Cell 1, 2 or 3 services or service components relied upon in provisioning other telecommunications providers' services when the comparable service offered by other providers rely upon non-competitive services or service components provided by the Company. This policy does not apply to residence or non-residence services subject to rate cap during the three year period.

II. DEFINITIONS

"LRSIC" is calculated as the total forward-looking cost, that is reasonably implementable based on currently available technology, of a telecommunications service, or relevant group of services, that would be avoided if the telecommunications provider had never offered the service, or group of services, or alternatively, the total cost the company would incur if it were to initially offer the service, or group of services, for the entire current demand, given that the company already produces all of its other services.

"Access service" means the provision by a telecommunications carrier of switched or dedicated access to an end user for the purpose of enabling a provider of telecommunications services to originate or terminate telecommunications service from or to the end user.

"Non-competitive service" or "Non-competitive service element" shall mean a service or any component thereof offered by Ameritech Ohio which has not been classified as competitive (meaning placed in Cell 4) by this Commission.

III. IMPUTATION CRITERIA

A. Individual services of Ameritech Ohio shall at all times meet the imputation test described in Section IV below if all of the following apply:

1. Ameritech Ohio has a service offering that competes with an offering of another telecommunications provider;

2. The other telecommunications provider's offering utilizes a service from Ameritech Ohio that falls within Cells 1, 2, or 3; and
 3. Ameritech Ohio's own offering utilizes the same Cell 1, 2 or 3 service or service component, or its functional equivalent.
- B. The imputation test should be performed on a service-specific basis for each individual tariffed offering, and for each service offered within an individual customer contract that relies upon such non-competitive service components.

IV. THE IMPUTATION METHODOLOGY

- A. The price for each Ameritech Ohio service subject to an imputation test under this Policy shall meet or exceed the sum of all of the following:
1. The tariffed rates, including access, carrier common line, residual interconnection and similar charges for the noncompetitive service or its functional equivalent that is actually used by Ameritech Ohio in its service offering, as those rates would be charged to any customer for the use of that service;
 2. The long run service incremental cost (LRSIC) of all other components of Ameritech Ohio's service offering, including but not limited to access charges actually paid to other telecommunications providers.
- B. Information, in addition to the imputation test(s) required in Section IV.A.1. above, may be filed where Ameritech Ohio seeks to use an alternative method for imputation. The alternative method could:
1. Demonstrate cost differences in the self-supply of a non-competitive service or component compared with the provision of that service or component for other telecommunications providers services, and/or
 2. Demonstrate that a competitor would in all likelihood purchase a different service in serving some or all end users (e.g., an interexchange carrier could serve some end users using special access service with self-provided dial-tone and originating switching, rather than switched access service) or use the services of a different provider to serve some or all of its end users (e.g., an interexchange carrier could serve some end users using the special

or switched access services of a Competitive Access Provider or Alternative Exchange Carrier).

Ameritech Ohio will provide notice to the Commission Staff and to other parties requesting notice when such cost differences and/or alternative supply options are proposed in its imputation test(s). Such notice will be provided at least 30 days prior to the effective date of any price changes or the offering of a new service or pricing plan. The 30 day advance notice may be reduced or eliminated altogether to effectuate changes required by the Federal Communications Commission. Parties may file written comments with the Commission Staff requesting review of Ameritech Ohio's proposed use of this alternative methodology. Provision to parties of study results is subject to Section VII following.

- C. In performing the cost studies in accordance with the methodology described in this section, Ameritech Ohio shall be permitted to exclude the revenues and costs associated with toll traffic that originates outside Ameritech Ohio's local exchange service areas for a period not to exceed 18 months from the date of the implementation of this plan.

V. WHEN THE TEST MUST BE PERFORMED

- A. An imputation test consistent with the methodology set forth in Section IV, for all services subject to this Policy, shall be performed when there is a price change as specified in 1, 2, or 3 below. Ameritech Ohio shall at a minimum include the filing of cost support documentation demonstrating compliance with this policy:
 - 1. With each new service or individual contract;
 - 2. With a reduction in the price below the controlling LRSIC study for a service offered to end-users; and
 - 3. With any increase in the price of a Cell 1, Cell 2, or Cell 3 (non-competitive) service offered to a telecommunications provider.

VI. ENFORCEMENT

- A. A telecommunications provider may, within 30 days following a reduction in rates by Ameritech Ohio for a tariffed service subject to this Policy, file with the Commission an objection to the reduction on the basis that the reduction is in violation of this Policy. The Commission, on its own motion or in response to a good faith complaint, may also

order Ameritech Ohio to provide cost support showing whether the service complies with this Policy. Upon a Commission determination that Ameritech Ohio has violated this Policy, Ameritech Ohio shall if authorized, and with notice to customers, change its price(s) so that the category would meet the imputation test or cease offering those services which cause the non-compliance. In any event, any Ameritech Ohio customer experiencing a price increase would be permitted to terminate service within 90 days of such Commission determination without incurring any early terminating liability.

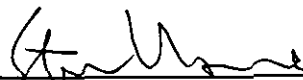
- B. If Ameritech elects to defer the effective date of reductions of rates subject to this Policy until after the Commission has approved the reductions following a determination that no parties have filed timely comments to Ameritech Ohio's filing or until after a determination on the merits by the Commission if any party has filed timely comments, then the enforcement provisions of this Section VI shall not be applicable to such rate reductions.

VII. CONFIDENTIALITY

Ameritech Ohio shall provide the result of any such studies performed to the Commission staff. Staff is of the opinion that there is information contained in imputation studies which may be of a proprietary nature. Therefore, we believe that parties other than staff should be given access to this information only if a process can be devised which recognizes and protects the proprietary nature of the information.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prepared Testimony submitted on behalf of the Public Utilities Commission of Ohio was served by regular, U.S. mail, postage prepaid or hand delivered to the parties of record on this 22nd day of August, 1994.



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