

RECEIVED

AUG 03 1994

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 Alternative Form of
Regulation.

Case No. 93-487-TP-ALT

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

Complainant

vs.

Case No. 93-576-TP-CSS

The Ohio Bell Telephone Company,

Respondent.

Testimony of
Nadia L. Soliman
Telecommunications

Staff Exhibit 27

1 Q. Please state your name and business address.

2
3 A. My name is Nadia L. Soliman. My business address is 180 East Broad
4 Street, Columbus, Ohio 43266-0573.
5

6 2. Q. By whom are you employed?
7

8 A. I am employed by the Public Utilities Commission of Ohio.
9

10 3. Q. What is your present position with the Public Utilities Commission of
11 Ohio?
12

13 A. I am a Telecommunications Rate Analyst Coordinator in the
14 Telecommunications Division of the Utilities Department. My main
15 duties include the investigation and analysis of variety of telephone
16 companies applications, including applications to offer new services, to
17 establish individual contracts, to increase its rates, and to establish
18 alternative regulation plan as in this proceeding. The scope of my
19 investigation includes the analysis and evaluation of the proposed
20 tariffs, rates, and cost of service studies provided by the telephone
21 company in support of its application. Also, I work on special projects,
22 and on Commission Ordered Investigation cases.
23

24 4. Q. Would you briefly state your educational background and work
25 experience?

1 A. I received my Bachelor of Science degree in Electrical Engineering from
2 Cairo University in 1982 with Major in Electronics and
3 Communications. I worked as an Electrical Engineer in Egypt
4 Commercial and Engineering Company from September 1982 to April
5 1984. I immigrated to the United States in April of 1984. I had
6 continuing education courses in computer programming from Franklin
7 University. I began to work at the Commission in September of 1987. I
8 assumed my current responsibilities in April of 1994. As of June of 1992,
9 I am a Certified Engineer in Training in the State of Ohio.
10

11 5. Q. What is the purpose of your testimony in this proceeding?
12

13 A. The purpose of my testimony is to respond to various objections to the
14 Staff Report of Investigation (Staff Report) in this proceeding, regarding
15 the Fully Distributed Cost of service study (FDC study) requirements, and
16 issues concerning contractual arrangements for services in different cells.
17

18 I am specifically responding to Ohio Bell's objections 1 and 2 in Section
19 H, and objection 1 in Section L; IXC Coalition's objections 4, 5, and 13;
20 Ohio Library Council (OLC) objections 28, 34, 35, and 36; Ohio Newspaper
21 Association (ONA) objections 26, 32, 33, and 34; American Association of
22 Retired Persons (AARP) objection 26; Office of the Consumers Counsel
23 (OCC) objections 18, and 33; Mid-East Telephone Answering Service
24 Association (METAS) of Ohio objection 3; The United States Department
25 of Defense (USDD) objection regarding contract proposals on page 14;
26 Ohio Cable Television Association (OCTVA) objections 3, 30, 31, 32, 72,

73, and 74; New Par Companies objection regarding contract proposals in page 6; and the Edgemont Neighborhood Coalition objections 16 and 33.

FULLY DISTRIBUTED COST STUDIES

6. Q. What is the fully distributed cost (FDC)?

A. The FDC for a group of services or a service category provided by a firm is the total costs of that service category after allocating all the financial accounting costs of the firm to all service categories provided by that firm. The FDC for a service category includes fixed common costs and costs shared by groups of services allocated to that service category plus the costs directly caused by providing it. The sum of the FDCs of all services provided by the firm represents the total costs of the firm.

7. Q. How should the fully distributed cost results be used? (OCTVA #30 & 31, ONA #32 & 33, and OLC #34 & 35)

A. The Fully Distributed Cost results should be used to identify the existing cost and revenue relationship for different service classes or service categories as a result of previous decisions, and to identify classes or categories for which revenues and costs should be realized. However, the Fully Distributed Cost study do not provide information on how to established appropriate prices. Since the Fully Distributed Cost study uses historic costs, it does not reflect the current or future costs that are based on current or future technologies. Also, the FDC do not provide a

1. reliable measure of what will happen to costs in the future if a particular
2. portion of the business expanded or contracted. Additionally, the FDC
3. study cannot reflect market reaction to price change relative to demand
4. change.

5.
6. 8. Q. Did Ohio Bell (OBT) provide a fully distributed cost analysis in this
7. proceeding? (IXC Coalition #5)

8.
9. A. Yes. OBT has submitted a Fully Distributed Cost study to the Staff as
10. response to Staff's Data Request no. 21.

11.
12. 9. Q. Ms. Soliman, would you please give an overview of that fully
13. distributed cost study? (IXC Coalition #5)

14.
15. A. The FDC is developed to allocate total OBT intrastate costs into 6 cost
16. groups which are based on the combination of the three price cap baskets
17. and the four cell classifications. These cost groups are: Cell 1 Carrier
18. Access, Cell 1 Residence Loop, Cell 1 Residence Non-Loop, Cell 1 Non-
19. Residence Loop, Cell 1 Non-Residence Non-Loop, and Cells 2-4. The
20. study is based on the FCC's Part 36.

21.
22. As a first step, the total company regulated investments and expenses are
23. allocated to interstate and intrastate jurisdictional using Part 36
24. allocation factors, which further allocates the Company's intrastate
25. investments and expenses into 5 operations. These operations are:
26. InterLATA Message, IntraLATA Message, InterLATA Private Line,
27. IntraLATA Private Line, and Other (i.e. Exchange). The second step in

1 the study is to separate Cells 2-4 investments and expenses from Cell 1
2 investments and expenses. The third step is to allocate the amount of
3 each total Cells 2-4 investments and expenses to each of the 5 Part 36
4 operations using Part 36 allocators for each investment and expense.
5 The fourth step is to split the Exchange investments and expenses for
6 Cell 1 and Cells 2-4 between Message and Private Line (PL) using Part 36
7 allocators. Furthermore the Exchange-Message investments and
8 expenses is split between Loop and Non-Loop using Part 36 allocation
9 factors. Finally, the Exchange Message-Loop operation is split between
10 Residence and Non-Residence using loop counts, and the exchange
11 Message Non-Loop operation is split between Residence and Non-
12 residence using minutes of use (MOU).

13
14 The FDC study developed by Ohio Bell is based on data that represents
15 the first four months of 1992. The Staff finds that the FDC study results
16 based on that time frame (after Staff modifications) provide a reasonable
17 distribution of OBT's FDC over the 6 cost groups.

18
19 10. Q. Please explain how the allocation of costs between Cell 1 and Cells 2, 3 &
20 4 is generally done in the study.

21
22 A. The total investments associated with most Cells 2-4 services are
23 generally identified using Part 36 allocators where possible. In some
24 cases, where Part 36 allocators were not available, OBT used special
25 studies to identify Cells 2-4 investments. Once the investment associated
26 with Cells 2-4 has been determined the Part 36 allocators can be used to
27 determine the expenses associated with each investment.

1 11. Q. Ms. Soliman, did the staff, in its analysis, use the FDC study as proposed
2 by OBT?
3

4 A. No. Staff could not use the FDC study as provided by OBT for the
5 following reasons: first, the FDC study results do not reflect any of the
6 Staff recommendations, and second, the study is a copy of a mainframe
7 version that is not fully mechanized, and therefore Staff could not verify
8 its accuracy.
9

10 Therefore, the staff developed an interactive FDC model using OBT's
11 data for total company (interstate and intrastate) investments and
12 expenses, and following the same steps as described earlier. The Staff has
13 modified the model to include all Staff recommendations in the Staff
14 Report.
15

16 12. Q. Please explain the modifications that the staff made to that FDC study.
17

18 A. There are two main adjustments that were necessary to be made in order
19 to have a study that reflects OBT's costs based on Staff's analysis and
20 recommendations. These adjustments are:
21

22 a. In the FDC study, the Staff utilized the recommended jurisdictional
23 allocation factors as listed in Schedule B-7 of the Staff Report to
24 allocate total company investments and expenses between the
25 interstate and intrastate jurisdictions.

1 b. In the FDC study, the Staff utilized the recommended cell
2 classification to separate Cells 2-4 investments and expenses from
3 Cell 1 investments and expenses.
4

5 13. Q. Would you summarize the results of staff's FDC model?
6

7 A. The summary of the FDC model results is attached to my testimony as
8 Attachment 1. The FDC model provides that Cell 1 services costs
9 represent 80.9% of OBT's total intrastate costs, and Cells 2, 3 and 4
10 services costs together represent 19.1% of its total intrastate costs (see
11 Attachment 3, line 1). It also provides that Cell 1/Residence services cost
12 represent 50.8% of total intrastate costs, while Cell 1/Non-Residence
13 services costs represent 24.1% and Cell 1 Carrier Access services costs
14 represent 6% of total intrastate costs.
15

16 14. Q. Ms. Soliman, would you explain how the staff utilized its FDC model
17 results? (IXC Coalition #5)
18

19 A. As stated earlier in my testimony, the Staff used the FDC study results to
20 identify the existing cost and revenue relationship for the different
21 service groups, and to identify categories for which costs and revenues
22 should be realigned. Therefore, the Staff used the FDC study results to
23 allocate the (test year) Staff recommended revenue requirements to the 6
24 service groups identified in the FDC model (see Attachment 3, line 3).
25 Additionally, in order to compare cost results to actual revenues, the
26 Staff determined the distribution of OBT's test year operating revenues
27 over the same 6 service groups, as shown in Attachment 2.

1 As demonstrated in Attachment 3, line 6, OBT's test year operating
2 revenues exceed the test year revenue requirements by approximately
3 \$135 million. The Staff found that Cell 1 services revenues and Cells 2-4
4 services revenues recover their respective costs. However, within Cell 1
5 services, the Cell 1/Residence revenues do not recover their costs and
6 have a revenue deficiency of approximately \$195 million, while Cell
7 1/Non-Residence and Cell 1/Carrier Access revenues recover their
8 respective costs with an excess revenue of approximately \$227 & \$50
9 million, respectively.

10
11 15. Q. Should the development and production of the fully distributed cost
12 study be a continuous requirement? (OBT #L.1., Edgemont #16, OLC
13 #28, ONA #26, OCC #18, OCTVA #3, 32 & 35)

14
15 A. The Staff, in its Staff Report, recommended that at the conclusion of the
16 4th year of the plan Applicant be required to file an FDC study for Cell 1
17 services. This study, together with other information requirements
18 listed in the Staff Report, will help the Commission to evaluate whether
19 the plan continues to be in the public interest, and remains consistent
20 with the telecommunications policies of the state. However, the Staff
21 finds that developing a FDC study, in the format outlined later in my
22 testimony, for Cell 1 services should be a continuous requirement. This
23 FDC study for Cell 1 services should be filed every twelve months from
24 the date the plan is approved. The FDC for all Cell 1 services will be the
25 ceiling for total Cell 1 services revenue. Also, the FDC for Cell
26 1-Residence services will be the ceiling of the Cell 1-Residence revenues.

1 16. Q. What is the format of the fully distributed cost study that the staff
2 recommends be filed?

3
4 A. Ohio Bell Should file an interactive FDC study for Cell 1-Residence
5 services and for the Cell 1-Non-Residence services for the following
6 service aggregations: Network Access Line, Central Office Termination,
7 Usage-Flat, Usage-Message, Usage-Measured, and all other services.
8

9 17. Q. Should Ohio Bell file, at the end of the 4th year of the plan, a fully
10 distributed cost study for each cell (Cells 1, 2, 3, and 4)? (OBT #L.1., OLC
11 #28, ONA #26, OCC #13, OCTVA #3 & 32)
12

13 A. No. The Staff believes that OBT should file a FDC study only for Cell 1
14 services in the format outlined above. Using that study one can
15 determine if Cell 1 services are subsidizing the rest of the services offered
16 by OBT or not. This FDC study will be used as a safeguard against cross
17 subsidization, in addition to other safeguards discussed by Staff witnesses
18 Montgomery and Shields. In other words, as long as Cell 1 services
19 revenues in a specific year do not exceed their respective FDC for the
20 same period, there will be no cross subsidy between Cell 1 and other cells.
21

22 18. Q. Should the fully distributed cost be used to set rates for individual
23 services? (OLC #34 & 35, ONA #32 & 33, OCTVA #30, 31, 72 & 73)
24

25 A. No. The Alternative Regulation Rules adopted in Case No.
26 92-1149-TP-COI, establish the pricing rules to be followed for any
27 Alternative Regulation plan filed by a large LEC with the Commission.

1 Section XII.A.4 of these rules states that "The minimum price for any
2 new or existing service for which a cost test is required to be submitted
3 pursuant to these rules shall be the LRSIC." Additionally, Staff witness
4 Shields addresses the pricing parameters recommended by Staff in the
5 context of Company's price caps plan.

6
7 The second reason that Fully Distributed Cost should not be used to set
8 rates is that the FDC allocates non-incremental costs to services while
9 these non-incremental costs are not affected by the decision of providing
10 or not providing the services in question. Third, the FDC cost-based
11 rates are not flexible to reflect changes in the market due to change in the
12 market demand. Therefore, they do not tell whether a particular service
13 is really profitable or not profitable. This is even more problematic in an
14 environment that has a mixture of competitive and non-competitive
15 services, which requires different levels of pricing flexibility.

16
17 Rates should be set based on relevant costs which are directly caused by
18 providing the service, with additional mark-up to contribute to the
19 common costs. That will give the Company enough pricing flexibility to
20 respond to market changes. I would also like to point out that the
21 Commission in its Alternative Regulation Rules has realized that
22 "Common overhead costs are incurred for the benefit of a firm as a
23 whole and are not avoided if individual services or categories of services
24 are discontinued."

- 25
26 19. Q. Should the cell 4 floor price be set at or above the fully distributed cost?
27 (OCTVA #30, 31 & 32)

1 A. No. Again, as stated previously, the Alternative Regulation Rules do
2 not require rates for services classified in any cell to be set at the FDC.
3 Also, Section XII.E.3 of the Alternative Regulation Rules, states that " A
4 cost test demonstrating that the price charged is above the LRSIC shall be
5 provided for all Cell 4 services."

6
7 Cell 4 services are competitive services, and competitive prices should be
8 set at levels that consider the demand side of the market and what rate-
9 payers are willing to pay for those services. To achieve that goal, prices
10 should be set based on the relevant costs which are directly caused by the
11 decision of providing that service plus an additional mark-up
12 (determined by the market) that will contribute towards the recovery of
13 the firm's common costs. The FDC for a service includes the relevant
14 costs plus a fixed allocated portion of the common costs to that service
15 which represents an artificially marked-up cost to be recovered.
16 Therefore, the Fully Distributed Cost, generally, is not an appropriate
17 tool to set rates for different services provided by a firm, and specifically
18 competitive services rates.

19
20 20. Q Do the alternative regulation rules require a large local exchange
21 company (LLEC) to submit a cost study (specifically FDC) at the time it
22 classifies a service in Cell 4? (OCTVA #31)

23
24 A. The Alternative Regulation Rules require a LLEC to file certain
25 information (see Alternative Regulation Rules, Section XII.E.) to
26 demonstrate the competitiveness of each service it proposes to be
27 classified in Cell 4. Also, since the rules state that all Cell 4 services shall

1 be detariffed, the rules request that "A cost test demonstrating that the
2 price charged is above the LRSIC shall be provided for all Cell 4 services."
3 The "price charged" for existing services that the Staff recommended to
4 be classified in Cell 4 have been already filed with the Commission,
5 reviewed by the Staff, and approved by the Commission to be reasonable
6 and above its LRSIC in other cases. Therefore, there is no need to require
7 OBT to perform an LRSIC study for each service the Staff recommended
8 to be classified in Cell 4.
9

10 21. Q. What is the embedded cost of a service?
11

12 A. The embedded cost of a service is the actual cost the firm incurs to
13 provide that service.
14

15 22. Q. Should OBT provide annual embedded cost analysis? (OCC #18)
16

17 A. No. The Staff recommendation to file an FDC study every 12 months
18 during the course of the plan will be a sufficient tool to detect any
19 unreasonable and sudden change in costs/revenues relationship.
20

21
22 CONTRACTUAL ARRANGEMENTS
23

24 23. Q. Does the staff recommendation in the staff report prohibit Ohio Bell
25 from entering into contracts that include Cell 1 services? (Department of
26 Defense #C.3.)

1 A. No. The Staff recommendation gave Ohio Bell the ability to enter into
2 contractual arrangements that include services classified in Cells 1, 2, and
3 4 according to the Alternative Regulation Rules in Section X. Also, the
4 Staff recommended that OBT would be able to enter into contracts
5 include Cell 3 services with some additional conditions regarding those
6 contracts.

7
8 24. Q. Is it the staff's opinion that all services provided under contracts should
9 be subject to imputation adjustments? (IXC Coalition #13)

10
11 A. No. Only services that would have been subject to imputation
12 requirements if provided via tariffs will be subject to imputation
13 requirements if provided via contracts. The Alternative Regulation
14 Rules state that " LRSIC shall include an adjustment whenever the
15 service is offered such that an alternative provider must purchase a
16 service of the applicant to provision its competitive product, and the
17 applicant used the service so purchased by the alternative provider, but
18 bundles such service in the price applicant charges for its own service."
19 The rules do not require different imputation requirements for services
20 provided via contracts from services provided via tariffs. This means
21 that for any Cell 1, 2, or 3 service that is provided under contract and is
22 an essential input for the provisioning of a firm's other competitive
23 services (i.e. are alternatives to OBT's services), Ohio Bell will be
24 required to include the imputation adjustment in its LRSIC.

25
26 25. Q. Should rates for services provided via contracts be supported by LRSIC
27 studies or by FDC studies? (OCTVA #73)

1 A. According to the Alternative Regulation Rules, section XIII.D., rates for
2 services provided via contracts should be supported by LRSIC studies not
3 by FDC studies. Also, there are several reasons to support the rules. The
4 first and most obvious reason is that any firm engages in contractual
5 arrangements for competitive reasons, and LRSIC will provide a more
6 accurate basis on which competitive prices should be set. Second,
7 competitive prices should be set at levels that consider the demand side
8 of the market, or what rate-payers are willing to pay for a specific service,
9 and LRSIC will provide that, not the FDC. Third, with the Staff
10 recommended safeguards, such as the joint cost test and imputation
11 adjustments requirements there should be no concerns about
12 subsidization of contract rates or anti-competitive practice by the
13 Applicant.

14
15 25. Q. Ms. Soliman, should the staff specify standards for what constitutes
16 competitive challenges that OBT has to meet before it can enter into
17 contractual arrangements that include cell 3 services? (OCTVA #74,
18 ONA #34, OLC #36, and METAS #3)

19
20 A. No. This Staff recommendation is to accommodate any competitive
21 challenges or unique circumstances that might face OBT or their
22 customers in the future. The Staff realizes that it is not reasonable to set
23 a specific standard now for an ever-changing industry, but it will be more
24 appropriate to let the Commission evaluate it on a case by case basis.
25 Also, the Staff recommendation is consistent with the Commission's
26 Alternative Regulation Rules that did not specify the standards which
27 will constitute competitive challenges or unique circumstances that a

1 LLEC has to meet before it can enter into contractual arrangements for
2 Cells 1, 2, and 4.

3
4 26. Q. Should contracts between OBT and end-users be subject to a set of
5 standards different from standards for contracts between OBT and other
6 telecommunications service providers? (New Par b.)

7
8 A. No. The Alternative Regulation Rules regarding contractual
9 arrangements along with the Staff recommendations in the Staff Report
10 are intended to give the large LLEC, Ohio Bell in this case, a reasonable
11 freedom to enter into contractual arrangements with their customers
12 regardless of the entity of that customer (end-user or other
13 telecommunications service provider). This freedom is accompanied
14 with the necessary safeguards against cross subsidization to protect rate-
15 payers, and against anti-competitive behavior to protect the competitors.
16 The Staff and the Commission will still need to review all individual
17 contracts to insure that OBT is operating within the approved plan
18 framework. I would like to point out that, the Staff recommendation in
19 this proceeding is consistent with the current Commission practices
20 regarding contracts between utilities (LECs) and for contracts between a
21 LEC and an end-user. Also, it is consistent with the Commission's rules
22 adopted in Case No. 92-563-TP-COI (563) (see paragraph 10 of the
23 Commission's Entry On Rehearing issued on December 22, 1993), that
24 apply to Competitive Telecommunications Services (CTS) providers
25 contract filing, which require CTS providers to file with the Commission
26 all contractual arrangements.

1 27. Q. Would OBT's ability to offer cell 3 services via contracts contradict the
2 alternative regulation rules established in Case No. 92-1149-TP-COI?
3 (OCC #33)
4

5 A. The Staff's recommendation to allow Ohio Bell to enter into contractual
6 arrangements for Cell 3 services is based on the satisfaction of two
7 conditions. The first condition is to demonstrate the legitimacy of the
8 specific competitive challenge that OBT faces for the provision of that
9 Cell 3 service, or where it faces some other unique circumstances, which
10 is the same criteria to let a LEC enter into contracts for Cell 1 and Cell 2
11 services under the Commission's Alternative Regulation rules. The
12 second condition or requirement is to file a LRSIC study in support of
13 the contracted Cell 3 service rate whenever the contract rate is lower
14 than the rate it would have charged for that service if provisioned under
15 tariff or price list. This is the same requirement for contracts that include
16 Cell 1, Cell 2, or Cell 4 services with rates lower than the tariff rate for
17 the respective service under the Commission's Alternative Regulation
18 rules. Again, the Staff is trying to accommodate any competitive
19 challenges or unique circumstances that might face OBT or their
20 customers in the future, while protecting the competitors and ratepayers.
21

22 28. Q. Does the staff believe that the 30 day review period for contracts is an
23 appropriate requirement? (OBT #H.1.)
24

25 A. Yes. According to the Alternative Regulation rules, for each contractual
26 arrangement filing, Ohio Bell is required to submit, and the Staff needs
27 to review a LRSIC study to support the contract rates. In that LRSIC

1 study, Ohio Bell have to satisfy the imputation adjustment requirement,
2 and the joint cost test requirement. Also, in that filing, if applicable,
3 Ohio Bell will need to include the justification for including Cell 3
4 services in the contract according to the Staff recommendation. The Staff
5 believes that it will need that time to complete its investigation and be
6 able to provide a recommendation to the Commission. The Staff
7 believes it is not appropriate to compare the Alternative Regulation
8 rules and the Staff recommendation regarding that 30-day review
9 requirement to the zero-day contract requirement in the "563" rules,
10 mainly because the "563" contracts are solely for competitive services,
11 but the contracts in this proceeding include a combination of
12 competitive and non-competitive services. Also, to address Ohio Bell's
13 concern that the 30-day requirement would deprive the Applicant of the
14 same flexibility that CTS providers are afforded under 563 rules, the
15 Alternative Regulation rules Section XIII(E), provide Ohio Bell with the
16 ability to implement a contract (for Cell 2 or a combination of Cell 1, 2,
17 and 4) with a specific customer upon filing when necessary to respond to
18 an imminent competitive threat to that specific customer.

19
20 29. Q. Would you explain the purpose of the Staff's recommendation to add
21 the termination liability language, stated in the staff report page 83, to the
22 variable term payment plan (VTPP) termination language? (OBT #H.2.)

23
24 A. The termination liability language was added by the Staff to clarify the
25 Staff's position on termination liability terms, which is becoming
26 important with the increasing utilization of contractual arrangements
27 and VTPP like contracts. Also, this termination liability language has

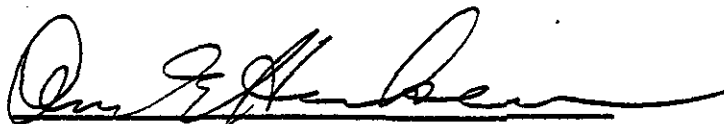
1 been recommended by the Staff, and endorsed by the Commission in
2 other proceeding like the "563" rules.

3
4 30. Q. Does this conclude your testimony?

5
6 A. Yes, it does.

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 3rd day of August, 1994.



STEVEN T. NOURSE

Assistant Attorney General

PARTIES OF RECORD:

Michael Mulcahy
Ameritech Ohio
45 Erieview Plaza, Room 1400
Cleveland, OH 44114

Barry Cohen
Associate Consumers' Counsel
Office of the Consumers' Counsel
77 South High Street, 15th Floor
Columbus, OH 43266-0550

Judith B. Sanders
Bell, Royer & Sanders Co., LPA
33 South Grant Avenue
Columbus, OH 43215-3927

Robin P. Charleston
AT&T Communications of Ohio, Inc.
227 West Monroe Street, 6th Floor
Chicago, IL 60606

Douglas W. Trabaris
MCI
205 N. Michigan Avenue, Suite 3200
Chicago, IL 60601

Mary Hull
Sprint Communications Co., L.P.
8140 Ward Parkway, 5E
Kansas City, MO 64114

William M. Ondrey Gruber
City of Cleveland
601 Lakeside Avenue, Room 106
Cleveland, OH 44114

Gregory Dunn
Crabbe, Brown, Jones, Potts & Schmidt
500 S. Front Street, Suite 1200
Columbus, OH 43215

Maureen Grady
Hahn Loeser & Parks
431 E. Broad Street, Suite 200
Columbus, OH 43215

Janine Migden
Hahn Loeser & Parks
431 E. Broad Street, Suite 1200
Columbus, OH 43215

William S. Newcomb, Jr.
Vorys, Sater, Seymour & Pease
52 East Gay Street
P. O. Box 1008
Columbus, OH 43216-1008

Bruce J. Weston
AARP
169 West Hubbard Avenue
Columbus, OH 43215-1439

Joseph Meissner
Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, OH 44113

Karin Rilley
Education Section
Office of the Attorney General
30 East Broad Street, 15th Floor
Columbus, OH 43266-0410

Ellis Jacobs
Dayton Legal Aide
333 West 1st Street, Suite 500
Dayton, OH 45402

Samuel C. Randazzo
Emens, Kegler, Brown, Hill & Ritter
65 East State Street, Suite 1800
Columbus, OH 43215

Sally W. Bloomfield
Bricker & Eckler
100 South Third Street
Columbus, OH 43215

Dennis K. Muncy
Meyer, Copel, Hirschfield, Muncy,
Jahn & Aldeen
Athenaeum Building
306 W. Church Street, P.O. Box 6750
Champaign, IL 61826-6750

Cecil O. Simpson, Jr.
Office of The Judge Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Daniel Malkoff
Dept. of Administrative Services
30 East Broad Street
Columbus, OH 43215

Sheldon Taft
Vorys, Sater, Seymour and Pease
52 East Gay Street
P. O. Box 1008
Columbus, OH 43216-1008

Clyde Kurlander
Teleport
Three First National Plaza
Chicago, IL 60602

Kerry Bruce
City of Toledo
Dept. of Public Utilities
One Government Center, Suite 1520
Toledo, OH 43604

William A. Adams
Arter & Hadden
10 West Broad Street
Columbus, OH 43215