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OCT 17 1996
DOCKETING DIVISION Public Utilities Commission of Ohio

**BEFORE**  
**THE PUBLIC UTILITIES COMMISSION OF Ohio**

In the Matter of the Petition of )  
 Jo Ross and Numerous Other Sub- )  
 scribers of the New Waterford )  
 Exchange of Ameritech Ohio, )  
 )  
 Complainants, )  
 )  
 v. )  
 )  
 Ameritech Ohio and GTE North )  
 Incorporated, )  
 )  
 Respondents, )  
 )  
 Relative to a Request for Two-Way )  
 Nonoptional Flat-Rate Extended Area )  
 Service Between the New Waterford )  
 Exchange of Ameritech Ohio and Each )  
 of the Canfield, Columbiana, East )  
 Liverpool, East Palestine, )  
 Leetonia, and Salem Exchanges of )  
 Ameritech Ohio, as well as the )  
 Hanoverton Exchange of GTE North )  
 Incorporated. )

Case No. 96-571-TP-PEX

**This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.**  
 Technician SW Date Processed 10-18-96

AFFIDAVIT OF KENTON J. PFISTER

I, Kenton J. Pfister, being sworn, state as follows:

1. I am the Assistant Vice President - State Government Affairs, for AT&T Communications of Ohio, Inc. ("AT&T").

2. I attest to the fact that AT&T has entered into an agreement with Ameritech Ohio and GTE North Incorporated that they will provide to the Public Utilities Commission of Ohio ("PUCO") all pertinent EAS information as required, including calling statistics, on behalf of AT&T.

3. I attest to the fact that AT&T has provided all the required EAS calling information with Ameritech Ohio and GTE North Incorporated.

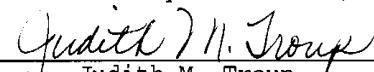
4. I attest that the format and content of the data that AT&T provides to the LECs is as described in our attached letter to the PUCO Attorney Examiner Mary Kay Fenlon dated November 7, 1994.

5. This statement is given in compliance with the PUCO's Entry dated August 21, 1996 in this case.

This ends my statement.

  
\_\_\_\_\_  
Kenton J. Pfister

Signed and sworn to before me  
this 17th day of October, 1996.

  
\_\_\_\_\_  
Judith M. Troup

**JUDITH M. TROUP**  
Notary Public, State of Ohio  
My Commission Expires 10-8-99

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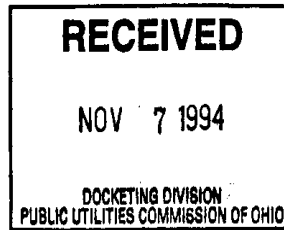


Patricia Butwin  
Assistant Vice President  
State Government Affairs

Suite 1500  
65 East State Street  
Columbus, Ohio 43215-4203  
Phone (614) 460-3381  
Fax (614) 460-3385

November 7, 1994

Ms. Mary Kay Fenlon, Esq.  
Legal Department  
Public Utilities Commission of Ohio  
180 East Broad Street, 7th Floor  
Columbus, Ohio 43266-0573



Re: Case No. 94-174-TP-PEX (Middletown)

Dear Attorney Examiner Fenlon:

This letter is to comply with the Commission's Entry dated October 7, 1994 in the above referenced case which ordered AT&T to respond by today's date on matters relating to our calling data.

As you are aware the data format for the EAS analysis was designed prior to divestiture and it did not anticipate the concept of IntraLATA/InterLATA. For this reason, AT&T can not provide the data as prescribed by the PUCO, but when ordered we continue to provide within our limited capability to the appropriate LEC(s) the following:

**(a) The number of their subscribers in each of the involved exchanges.**

AT&T understands that the LECs' records contain information regarding the customer's presubscribed Interexchange Carrier and when mandated we do authorize the LECs to use this data for this type of analysis.

**(b) The applicable toll calling rates and distributions of calling between the involved exchanges, along with a statement as to the types of services included in the companies' calculations of these calling statistics.**

AT&T is unable to provide the calling rates and distributions in the PUCO requested format. Instead AT&T continues to provide the information as previously described in our March 2, 1992 letter to Christine Pirik.

In that letter, AT&T confirmed that it only has the ability to provide point-to-point message data on a valid sample basis for calls originated from the LECs' exchanges. AT&T can provide this type of data usually on a 60 days' notice to AT&T; depending upon the number of NPA-NXXs involved, a longer notice period may be necessary.

Page Two  
Ms. Mary Kay Fenlon, Esq.  
November 7, 1994

However, it is important to note that AT&T cannot provide call distribution by access line on other than a total call/access line basis. (See Attachment I for a sample of the format used when providing AT&T's PROPRIETARY data to the LECs.) AT&T negotiates the study month with the LEC(s) on a case-by-case basis and authorizes them to use our toll calling data on an aggregated basis in combination with the subscriber information from (a) above to conduct the required analysis when ordered by the PUCO.

**(c) Information, including rates, concerning telephone service alternatives to the requested extended area service available to these subscribers in the involved exchanges.**

The services available between the involved exchanges include Message Telecommunications Service and the Reach Out<sup>®</sup> Ohio 1/2 hour, 1 hour and 24 hour optional calling plans. (See Attachment II for a complete index of AT&T's PUCO No. 2 Intrastate tariff offerings.)

**(d) For each alternative service listed in (c), the number of main stations subscribing to the service between the involved exchanges and, if available, the number of calls per month over the service. If such information is alleged to be unavailable, the company should file a written statement explaining why the information is unavailable.**

Upon receiving a PUCO interLATA EAS Entry ordering the IXCs to respond, AT&T provides to the LEC(s) the number of customers by exchange for each of the Reach Out Ohio plans listed in (c) above; however, the number of calls per month is not available.

**(e) For each alternative service listed in (c) above, an explanation of whether the alternative service will remain in existence if EAS is granted in this case.**

AT&T, like other IXCs, provide interexchange telecommunications calling services to meet a variety of customer needs, and these services do not specifically address EAS calling needs. These options will exist regardless of whether or not EAS is granted.

**(f) For each alternative service listed in (c) above, a general explanation of under what type of calling pattern the alternative service would still be preferable to the requested EAS.**

AT&T, like other IXCs, provide interexchange telecommunications calling services to meet a variety of customer needs, and these services do not specifically address EAS calling needs. These options will exist regardless of whether or not EAS is granted.

Page Three  
Ms. Mary Kay Fenlon, Esq.  
November 7, 1994

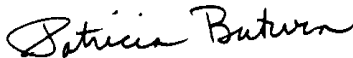
In addition to providing the above outlined data, AT&T also enters into a Confidentiality and Protection Agreement with the LECs to ensure that our data remains confidential. It is also AT&T's understanding that the data the LECs file with the PUCO will only appear in an aggregated format for all reporting purposes within the scope of the identified EAS case(s). AT&T continues to support these efforts.

Lastly, responding to Finding 12 (page 4) of the above referenced Entry in which the PUCO seeks clarification on AT&T's ability to provide detail relating to Foreign Exchange lines in the involved exchanges, and the number of Foreign Exchange and 1-800 calls made in the involved exchanges, AT&T answers in the following manner:

- Foreign Exchange usage services are provided through the LECs and their representative would better be able to provide that data if it is deemed necessary, and
- AT&T can not provide point-to-point per line call data for 1-800 services at this time. Significant development costs would be required to study and/or produce such information.

Please call me with any questions you may have relating to this matter.

Sincerely,



Patricia Butwin  
Assistant Vice President  
AT&T State Government Affairs

JT/ljgs

Enclosures

cc: Christine Pirik/PUCO  
Parties of Record

® Registered Mark of AT&T

May 27, 1994

Case: 93-1660-TP-PEX

The following contains information in response to the Commission's EAS data request.

Study Month = March, 1994

Messages

Dalton to Orrville  
Orrville to Dalton

Reachout Customers  
Dalton customers  
Orrville customers

Messages

Dalton to Kidron  
Kidron to Dalton

Reachout Customers  
Kidron customers

Messages

Dalton to Wooster  
Wooster to Dalton

Reachout Customers  
Wooster customers

### Applicable Rate Schedules

Case: 93-1660-TP-PEX

Message Toll Service (Customer Dialed Rates)

Rates Effective July 1, 1993

	{ Day }		{ Evening }		{ Night }	
	First Min.	Add'l Min.	First Min.	Add'l. Min.	First Min.	Add'l. Min.
Dalton to:						
Orrville	\$.19	\$.13	\$.1375	\$.0950	\$.1050	\$.0640
Kidron	\$.19	\$.13	\$.1375	\$.0950	\$.1050	\$.0640
Wooster	\$.20	\$.17	\$.15	\$.12	\$.12	\$.0880

Optional Calling Plan (Reach Out® Ohio)

**Half Hour Plan**

\$3.40 for the first half hour of night calling  
\$.11 for each additional minute of night calling

**One Hour Plan**

\$6.50 for first hour of night calling  
\$.1058 for each additional minute of night calling

**24 Hour Plan**

\$6.75 for first hour of night calling  
\$.1058 for each additional minute of night calling

Additional 15% discount off evening rates  
Additional 5% discount off day rates

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AT&T COMMUNICATIONS  
OF OHIO, INC.

ATTACHMENT 11  
Page 1 of 2  
Title Page  
6th Revised Sheet 1  
Cancels 5th Revised Sheet 1

P.U.C.O. No. 2  
Case No. 90-5105-CT-TRF

	Sect.	Page	Reference
<u>COMPETITIVE TELECOMMUNICATION SERVICES:</u>			
AT&T All PRO <sup>SM</sup> WATS	7	12	- 14
AT&T All PRO WATS (Restructured)	11	16	- 17
AT&T Busy Line Verification and Interruption Service	6	31	- 31 (N)
AT&T Commercial Long Distance Service	11	34	- 38
AT&T CustomNet Service	11	23	- 24
AT&T DIRECTory LINK <sup>SM</sup> Service	6	26	- 27
AT&T EasyReach <sup>SM</sup> Service	11	27	- 27
AT&T 800 Gold Service	11	26	- 26
AT&T 800 Plan K	11	19	- 20
AT&T 800 Plan P	11	28	- 28
AT&T 800 Plan Q Service	11	22	- 22
AT&T 800 Readyline <sup>®</sup>	11	12	- 12
AT&T MEGACOM <sup>®</sup> 800 Service	11	10	- 11
AT&T UNIPLAN <sup>®</sup> Service	11	29	- 29.1
AT&T MEGACOM WATS Service	11	9	- 9
AT&T PRO WATS	7	9	- 11
AT&T MultiQuest <sup>®</sup> Express900 Service	11	21	- 21
AT&T MultiQuest Service	11	13	- 14
AT&T One Line WATS in Ohio	11	15	- 15
AT&T OPTIMUM <sup>SM</sup> Service	11	25	- 25
AT&T Prison Collect with Controls Service	6	30	- 30
AT&T SelectCall Service	6	29	- 29
AT&T Small Business <sup>SM</sup> Option	11	31	- 31
ACCUNET <sup>®</sup> Generic Digital Access Service	12	43	- 47
ACCUNET Spectrum of Digital Services (ASDS)	10	50	- 70
ACCUNET T1.5 Service	10	25	- 36
ACCUNET T45 Service	10	71	- 72
AnyHour <sup>®</sup> Ohio	7	15	- 16
Audio Teleconference Bridge Service	11	39	- 39
College Connect Calling Service Custom	11	40	- 40
Custom Network Directory Assistance Service	11	7	- 7
DATAPHONE <sup>®</sup> Digital Service	10	18	- 25
Digital Data Local Channel Service	12	31	- 36
Directory Assistance Service	6	24	- 25
Distributed Network Service (DNS)	11	8	- 8
800 Service Add-On	8	10	- 16
800 Service Full State	8	1	- 9

<sup>SM</sup>Service Mark of AT&T

<sup>®</sup>Registered Service Mark of AT&T

Issued: October 19, 1994

Effective: October 19, 1994

Filed under authority of Entry issued by the Public Utilities Commission  
of Ohio, in Case No. 94-1669-CT-ZTA.

By John J. Puljung, District Manager, Chicago, Illinois



AT&T COMMUNICATIONS  
OF OHIO, INC.

P.U.C.O. No. 2  
Case No. 90-5105-CT-TRF

Page 2 of 2  
Title Page  
Original Sheet 2

COMPETITIVE TELECOMMUNICATION SERVICES:

	Sect.	Page	Reference
Evening Plus for Ohio	7	17	- 18
56/64 Kbps Switched Digital Service	10	37	- 49
Hospitality Network Service	11	30	- 30
Message Telecommunications Service (MTS)	6	3	- 23
Reach Out® Ohio	7	3	- 8
Software Defined Network Service	11	3	- 7
State Calling Service	11	32	- 33
Terrestrial 45 Mbps Local Channel Service	12	48	- 50
Terrestrial 1.544 Mbps Local Channel Service	12	37	- 42
Voice Grade Local Channel Service	14	7	- 14
WATS Add-On Service	8	10	- 16
WATS Full State Service	8	1	- 9

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Issued: January 14, 1994

Effective: January 17, 1994

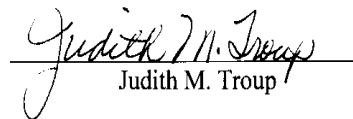
Filed under authority of Entry issued by the Public Utilities Commission  
of Ohio, in Case No. 94-57-CT-ZTA.

By John J. Fuljung, District Manager, Chicago, Illinois

**CERTIFICATE OF SERVICE**

Case No. 96-571-TP-PEX

The undersigned hereby certifies that a copy of the foregoing Affidavit of Kenton J. Pfister on behalf of AT&T Communications of Ohio, Inc. was served by regular U.S. mail, postage prepaid, this 17th day of October, 1996 upon the following parties of record.

  
Judith M. Troup

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