BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the matter of AT&T Communications)
of the Southwest, Inc.'s Petition for)
Second Compulsory Arbitration Pursuant)
to Section 252 (b) of the Telecommunications) Case No. TO-98-115
Act of 1996 to establish an Interconnection)
Agreement with Southwestern Bell Telephone)
Company)

AFFIDAVIT OF BARBARA A. SMITH

I, Barbara A. Smith, of lawful age, being duly sworn, depose and state:

1.   My name is Barbara A. Smith. I am presently Area Manager- Product

Development Costs, Analysis and Regulatory for SBC Telecommunications, Inc. My

qualifications and work history are attached as (Smith) Attachment 1.

2.   In response to the Costing and Pricing Report, Volume 2 issued on July

24, 1998, I have examined the various recommendations made by the Staff. The purpose

of my affidavit is to rebut portions of Costing Report submitted by Staff. Mr. Barry

Moore is also filing an affidavit rebutting portions of the cost recommendations made by

the Staff.

Local Switching Features ISDN and Analog

3.   SWBT has proposed a $5.00 per order service order charge for every

order that generates a service order on a mechanized basis, including local switching

features. Staff believes the $5.00 service order charge applies to an "as is conversion" for

resale or UNEs, not for other services or features.

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4   SWBT does not completely agree with Staff's supplemental recommendation on May 29, 1998 which was (1) for subsequent orders UNE service order charges will apply, (2) all simple orders are assumed to be fully automated with 95% flow through of the work order to completion and (3) complex orders are assumed to be fully manual. SWBT agrees with number (1) and (3) but does not agree with (2). I will discuss fallout and manual versus mechanized in this affidavit.

5.   Staff assumes that SWBT's UNE Operations Support Systems (OSS) are fully mechanized (they are not, even for SWBT's retail services) for ordering and provisioning UNEs. In discussions with Staff, Staff stated that they did not advocate a "scorched earth" view of SWBT's telecommunications network, yet by assuming all mechanized OSS, Staff imposes a theoretical OSS network, ignoring SWBT's current efficient OSS (See affidavit of Randal Vest), which includes some manual processes which vary depending upon the type of UNE, both in provisioning and in ordering systems. Staff assumes that since all processes are mechanized, the only manual intervention would be needed in the case of a "fallout" of an order, either at the time of ordering or further along in the OSS process needed for provisioning of the UNE. For SWBT provisioning purposes, it still encounters manual activity requirements, such as switch translations activities, field cross connect activity, etc., along with the fallout activity as SWBT has defined it above. These normal manual activities continue to be required to provide both SWBT retail services and UNEs. Thus, the probability of manual activity which is normally required has to be factored into the cost of provisioning. The use of 5% manual fallout rate greatly underestimates SWBT's likely incurred costs.

6.   Staff is recommending a 5% fallout percentage presumably based on a data request response that SWBT provided to Staff regarding SWBT's current CLEC fallout percentage for SWBT's retail Easy Access Sales Environment (EASE) which is also used to process resale orders. It is incorrect to use the fallout percentage for EASE because EASE is used by CLECs only to order resold services, not UNEs. Also, EASE is a front office system used strictly for <u>ordering</u> , not the many more complicated tasks associated with the provisioning of UNEs (complex ordering or back office systems). Staff's fall out percentage would not apply to any of SWBT's other downstream OSS, for example translations in the central office. At the present time, we do not have any history on exact "fall out" percentage in the UNE environment. We do know the fallout rate for Access Service Requests (ASR) for IXC access services and that rate would more accurately approximate the CLEC ordering environment in both systems.   We do know that CLECs have improved their EASE ordering processing and expect UNE to follow a similar path, assuming proper training, etc. ASRs have been submitted to SWBT by the IXCs since the mid 1980s and the current fallout rate is 30 –50%. Even though there is a similarity between CLEC UNE orders and ASRs, access service orders are actually less complex than many of the orders for resold services or UNEs, so it is probable that the fallout could be similar.

7.   By requiring 95% flowthrough (also can be viewed as 5% fallout) one assumes that the flow through rate achieved with EASE can be achieved with any electronic interface used to perform ordering, preordering and provisioning of UNEs, which is incorrect and will lead to under recovery of SWBT's costs. The majority of SWBT's nonrecurring costs for service orders, translations etc., have been drastically

reduced as a result of this fallout assumption. Essentially what this assumption does is to apply 05 to SWBT's existing nonrecurring costs. so for example. a nonrecurring cost that was $100 before. becomes $5.

8.   The Commission did not order SWBT to use EASE for anything other than its intended use. Even used properly for retail and resale service orders. EASE has its limitations. EASE cannot be used for all telecommunications services or with all residential or business accounts due to the complexity or wide variations of configurations. For example. residential EASE can only be used for pre-ordering and ordering activities for a residential account having up to five (5) access lines. Business EASE is limited to pre-ordering and ordering activities for a business account with up to thirty (30) local access lines Plexar I and DigiLine. In addition EASE cannot be used to order any of the following:

Plexar II and Plexar Custom

ISDN (with the exception of DigiLine)

Advanced Intelligent Network

Private Line Services

Off Premise Extension

Preferential Hunting

Rearrange Hunting

9.   Also. EASE cannot be used to change the classification of local service. i.e. business to residence; residence to business. In each of these types of instances and for other similar complex services, manual processing by SWBT representatives is

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required to place the service order into SORD. This is true regardless of whether such order is placed for a SWBT retail customer or by a CLEC.

10. SWBT makes the same EASE available to CLECs and its service representatives in the same manner and for the same services as it is available to SWBT's service representatives. Thus, identical service orders (i.e. same data, same format) submitted by a CLEC service representative and a SWBT service representative will be processed identically, and achieve the same flow through rate.

11. EDI or LEX is used instead of EASE to order UNEs. EDI is an off line, batch application that allows a CLECs local service requests (LSRs) and some UNEs to be electronically transmitted in a format which conforms to the Ordering and Billing Forum/ Telecommunications Interface Forum (OBF/TCIF) national guidelines. LEX, also an offline batch application, uses a Graphical User Interface (GUI) developed by SWBT that allows CLECs to electronically create and transmit LSRs for some UNEs to SWBT.

12. Not all UNES can be ordered using LEX or EDI in that the OBF/TCIF has no standards for all UNE LSRs. Some examples of UNEs with no electronic request capabilities are :

>Analog Line Switch Port with Centrex features
>
>BRI Switch Port with Centrex features
>
>PRI Switch Port
>
>DS1 Trunk Port
>
>Analog Trunk Switch Port

13.   AT&T assumes electronic delivery of all orders and at 98% error free, a process it says is forward looking. Yet it assumes a process that AT&T is incapable of using; AT&T cannot transmit orders in electronic format – it lacks the capability and must use manual delivery at the present time, although AT&T has asserted in other forums that it has improved implementation processing under development and has done some interactive testing with SWBT.

14.   In April, 1998, SWBT implemented flow through capability for the most common order types of UNEs. Of course, EDI flowthrough is not possible until a CLEC has fully developed and tested its side of the EDI application. For example, although ordered by the Texas Commission to have their side of the EDI ready by October 1, 1998 for this ordering capability of UNEs, AT&T has gone on record stating that their side of EDI will not be ready until the first quarter of 1999.

Unbundled Call Trace Per Activation

15.   SWBT originally proposed nonrecurring costs based on the average time to process the activation on a per occurrence basis, set up the trace and send a warning letter. In the future, these activities will be conducted on an automated basis and Staff recommends the costs should be based on the automated process, not the manual process. SWBT agrees with Staff's recommendations in this arbitration and has no additional comments.

Direct Inward Dialing

16.   It is my understanding that SWBT and AT&T have agreed upon the rate for DID. SWBT has no additional comments.

Unbundled PRI Port Features

17.   Staff recommends cutting the nonrecurring rates for port feature activation by half. Staff states it cannot judge if SWBT or ATT translation activation work times are correct.

18.   Staff's recommendation should not be adopted. The SWBT cost studies properly estimated work times. Additionally, as the affidavit of SME Sharon Sadlon demonstrate, the time estimates are conservative at best. SWBT work times are correct because they are produced by people/organizations doing the work on a regular and ongoing basis. The translations times have been provided by Subject Matter Experts (SMEs) who have over 10 -20 years of experience in doing translations work for SWBT. The translations times were developed by the SMEs, provided to nine field managers for verification and then further validated by the SMEs in a lab environment by an individual time and motion study. (See the affidavit of Sharon Sadlon) AT&T's time estimates were provided by a national team of "experts", none of whom have any recent experience in the local telephone company environment or even in Southwestern Bell's territory. The level of documentation for SWBT's translation times is in stark contrast to information from AT&T. AT&T provided no time and motion studies and little or no supporting documentation for their time estimates.

19.   Staff agrees that port feature activations involve more work than analog or BRI port features and also agrees that they require translation work time. Accordingly, it would be incorrect to cut SWBT values by half even if there were some reason to give credibility to AT&T's estimates, which there is not.

20.   SWBT also disagrees with the global modifications which specify four rate zones. That global modification is not relevant to the nonrecurring port feature activation cost because the time for translations activities does not differ based on the rate zones.

Unbundled BRI CSV/CSD/Unbundled BRI Port Features

21.   Staff believes that there is no translation activity difference between BRI features and other Local Switching features, therefore the same rates (developed from the nonrecurring time estimates) should apply. In fact, there is a difference in activity, which affects the cost. The difference between these nonrecurring costs and other basic local switching features is that there is no mechanized flow through for BRI CSV/CSD Unbundled BRI Port features. Instead, all translation activities are input manually. The same is true for these features offered to SWBT's retail customers. The basic Electronic Key Telephone System (EKTS) feature package consists of 8 features. The Call Handling Call Appearance (CACH) feature package consists of 11 features. Like a hunt group where the translations are built by manually inputting numerous individual terminals or telephone numbers and special hunting parameters, such as rotary hunting instructions, these two BRI feature packages are manually combined or built to package the many different features. In addition, these orders must be manually reviewed by the Recent Change and Memory Administration Center (RCMAC), which is responsible for inputting the line translations into the switch.

Unbundled Centrex Like Features – Analog/ISDN

22.   Staff also assumes that there is no difference in the translation activity between Centrex-like features and other local switching features, therefore the same rates

(developed from the nonrecurring time estimates) should apply. This is incorrect. While it may be correct to assume that the majority of the orders for local switching features are flow through, this is not true for Centrex-like features.

23.   Local switching features are line-side features that are not provided in a customer- specific common block arrangement, which is required for Centrex or Plexar. Because of this, local switching features typically only require the involvement of the RCMAC group. In most cases, there is no need for the Central Office Translation Specialists or the Communications Technicians to be involved with these simple features. These groups are required to input the translations for Centrex Like features.

24.   Centrex-Like features, on the other hand, require additional manual work effort over and above what is done for local switching features. For example, Line Translation Specialists in the RCMAC group, are required to manually type service orders into the system due to customer specific dialing plans and because Centrex offerings include more complex common block-based features that cannot be recognized by the MARCH system. (For a description of the MARCH system, see affidavit of Merri-Lynn Owens). Additionally, Centrex-like features often require the involvement of additional work groups to perform other manual activities. As an example, Central Office Translation Specialists and Communications Technicians are required to perform manual activities to activate memory in the switch as well as to define customer parameters.

LIDB

25.   LIDB is a SS7 service. Staff reviewed other SS7 services in the First AT&T arbitration and made recommendations regarding utilization levels for the SS7 equipment. All of the recommended STP Utilization changes recommended by Staff

previously are reflected in the Missouri 1997 Line Information Data Base (LIDB) Validation Query study dated June 9, 1997. The study was provided to the Staff in meetings when they reviewed studies in early 1998.

26.   SWBT proposed using the actual utilization of the SS7 network in its studies, as a reasonable projection of a forward looking, dynamic utilization. Staff disagreed and recommended using a higher projected utilization rate. These projected utilizations overstate what SWBT can be expected to experience. Current utilizations are the best representation of a relationship where some services may increase and some may decrease due to the changing industry.

27.   The growth amounts also contradict Staff's position requiring removal of inflation from the studies, since it is inconsistent to assume growth which may not be experienced, while disallowing inflation which will be experienced. The criteria seems based on artificially reducing the cost below what is actually experienced rather than any real concerns Staff may have with SWBT's cost study.

28.   Staff recommends cutting the service order charge for LIDB in half due to "lack of evidence to support the labor times". The LIDB service order time estimates were provided by the SMEs actually processing LIDB service orders today, Processing LIDB service orders is a manual effort where the Service Representative discusses with each individual customer their specific requirements to determine what they want included in their database and then actually processes the order. LIDB service orders are limited to the first time the CLEC orders the service, so the low incidence of orders would not warrant mechanizing the process. This time to process a LIDB service order is not in any way impacted by the fall-out rate because it is totally a manual process.

Complex Service Conversion Charge - Resale

29.   Staff makes a recommendation to cut the nonrecurring charges (based on nonrecurring time estimates) in half. This recommendation has no basis. SWBT's time estimates were based on assumptions and specific knowledge of SWBT's operations and the time it takes to perform these operations. The SWBT time estimates were provided by subject matter experts who have experience in performing the task at hand, who work in the field performing these tasks daily and who have the knowledge and experience to provide quality data for our cost studies. AT&T's estimates were provided by an undefined "national team" and were not based on any specific knowledge of SWBT Missouri operations.

30.   Based on the documentation provided by SWBT, in support of its nonrecurring cost studies, SWBT clearly has more "sound justification and support" than AT&T. AT&T provided no documentation in support of its nonrecurring time estimates or its hypothetical fall-out rate.

31.   SWBT validated the times used in the nonrecurring studies. The time estimates provided by the subject matter experts (SMEs) were validated by the cost analysts by comparing the times to prior cost studies and services with similar assumptions.

Unbundled Service Order – UNE Complex

32.   Staff recommends reducing the time estimates in this study that pertain to typing and negotiation. Many of the time estimates for the UNEs were based on data used for SWBT's retail service cost studies. Many of SWBT's retail services, like Plexar (also known as Centrex) are considered competitive and it would not benefit SWBT to

provide high time estimates for these or any other services. The same principle applies to the UNE time estimates.

33.   There is not a completely mechanized process in place for UNE service orders. Although service order processing must meet Ordering and Billing Forum/Telecommunications Interface Forum (OBF/TCIF) national guidelines. OBF standards exist currently, only for loops, analog port and loop with INP. With some UNEs there is no mechanized order delivery process for the SWBT retail services composed of the same elements. However the UNE order is received into the OSS process like all other SWBT retail services where mechanized OSS is applicable.

34.   Although all SWBT's OSS will be available and will be used in provisioning UNE orders, e.g. SORD, SOAC, FACS, etc., I will explain which OSS (e.g. CPC or SCC) is used for service orders and the process to enter the order into the OSS provisioning flow through SORD. It is not correct to assume that all UNE orders will be mechanized and that those that are mechanized will flow through.

35.   Staff states that it is appropriate to assume a mechanized ordering process for a number of network elements. This is incorrect. SWBT is in the process of developing mechanized order generators, which will accept an order electronically from AT&T. However, all UNE orders cannot be accepted and flowed through electronically at this time and in some cases ever. This is also true for a number of SWBT's retail services that are so complex, they must be entered manually for the service order process (e.g. DS-1).

36.   Also, there are many CLECs who find it more cost effective to process their own orders manually. For Staff to assume that all orders in the future will be

processed electronically is incorrect. To manually process a UNE order negotiation or coordination and typing time are required.

37   Staff makes a recommendation to reduce the time estimates for SWBT's nonrecurring studies, which is without any basis. SWBT's time estimates were based on assumptions and specific knowledge of SWBT's operations and the time it takes to perform these operations. The SWBT time estimates were provided by subject matter experts who have experience in performing the task at hand, who work in the field performing these tasks daily and who have the knowledge and experience to provide quality data for our cost studies. AT&T's estimates were provided by an undefined "national team" and were not based on any time and motion studies.

38.   Based on the documentation provided by SWBT, in support of its nonrecurring cost studies, SWBT has more "sound justification and support" than AT&T. AT&T provided no documentation in support of its nonrecurring time estimates or its hypothetical fall-out rate.

39.   SWBT, however, has a sound basis for its assumptions. While there is no history of exact fall-out in a UNE environment, nor could there be at this early stage, ASRs have been submitted to SWBT by the IXCs since the mid 1980s and the current fallout rate is 30 –50%. Access service orders are less complex than many of the orders for resold services or UNEs, so it is not improbable that the fallout could be as high or higher since CLECs impact their own orders and SWBT has no control over CLEC service representative training.

40.   For Complex service orders, Staff recommends the negotiation time be cut in half and the typing time be reduced to 15 minutes. Staff seems to have a

misunderstanding of the meaning of "Negotiation" in the UNE environment. Negotiation

has nothing to do with developing the contract or price. Negotiation in the UNE

environment involves coordination activities associated with the validation process as well

as coordinating frame due dates or dispatch required. The validation process includes

activities such as receiving the order, reviewing the order for accuracy, possibly sending

/calling back to the CLEC for correction. The validation process must be completed

before orders can be typed into SORD.

41.   Coordination with other departments (Network Sales Support,

Routing Managers, Circuit Provisioning Center, etc.) is required to process Complex

orders.

42.   Listed below are the steps typically involved in processing a Complex

order:

RECEIVE LOCAL SERVICE REQUEST FOR COMPLEX SERVICE

1. Log , Stamp date and time received.

2. Review Local Service Request (LSR) for completeness and accuracy.

3. All fields on the LSR must be validated. Examples of validation include

   activities such as (1) logging on to PREMIS and confirm accuracy of

   address (2) pulling up Customer Service Records and comparing

   Telephone Numbers, end users name and address. If errors are found,

   the CLEC will be contacted for a Supplemental (Supp) to LSR to correct

   errors. Once Supp is received, the LSR must be reviewed again to insure

   Supp corrected the errors and did not create new errors.

3a. Review contract for services ordered and associated rate elements.

4   Coordinate with Circuit Provisioning Center (CPC) for

>   DS1 or DS3 CLF assignments

>   Critical dates

>   Possible for facility availability for Primary Rate Interface (PRI)
    services

5. Coordinate with Network Sales Support for:

>   Service Availability (e.g., verify if requested Port Features are
    available in the requested office switch)

>   Centrex Services

>   PRI Services

>   DID Services

>   Critical dates

6. Coordinate with Line and Number Administration Center (LNAC) for:

>   DID numbers

>   Other numbers

7. Assign order information to LSR:

>   Billing Account Number (BAN) if required

>   SWBT SORD order number(s)

>   Critical dates

8. Send confirmation to CLEC

NXX Migration

43.   The Staff recommends cutting SWBT NXX Migration rates in half.

When a CLEC requests that SWBT move an entire NXX to their switch, SWBT incurs

expense and should be compensated. . The migration requires network rerouting effort and equipment record changes. That effort is caused by the CLEC's activities but is not reflected. or compensated for. in any of the nonrecurring charges for individual UNEs. The efforts are in addition to whatever it takes to establish the UNEs.

44.   Staff's comments noted that AT&T felt "all costs will be recovered internally through migrating an NXX"' misses the point that a CLEC is specifically causing this shift. Other CLECs and retail customers should not have to cover the cost being caused by one CLEC in a specific situation. There would be no reason for SWBT to incur that cost if not for the CLEC.

45.   AT&T prognosticators do not deal with SWBT systems and procedures, including the extensive coordination. Therefore, SWBT's time estimates reflect reality and should be accepted.

46.   Staff recommends that a NXX Migration Charge be developed. That recommendation is inconsistent with how NXX Migration works. A NXX Migration will involve work done for switches in all zones. but it is unlikely one NXX migration would involve all the switches of one zone.

Time Estimates Proposed by Staff and AT&T

47.   Staff repeatedly states in its comments that SWBT has no time and motion studies. therefore SWBT's nonrecurring costs should be cut in half. AT&T also has no time and motion studies. Because of the wide variance in the time estimates proposed by AT&T and SWBT, Staff recommends the nonrecurring costs be halved. However, SWBT has reviewed AT&T's nonrecurring Task Oriented Cost (TOC) studies that it conducts for its own internal use. developed by an AT&T cost group in New

Jersey. SWBT made a comparison of AT&T's TOC studies for the activities and time estimates required to provision a DS1 and DS3 circuit with SWBT's own nonrecurring studies proposed in the First AT&T Arbitration. Case No. TO-97-40, and found them to be similar. (See (Smith) Attachment 2 and 3) AT&T's own Nonrecurring Cost Model, submitted to Staff in this arbitration. proposes time estimates much, much lower than its own internal TOC studies. Given the fact that AT&T produces two different time estimates for the same type of service, one for arbitration studies and one for its own internal use. and its internal TOC studies validate SWBT's studies. AT&T's UNE time estimates should not be taken as credible. nor should they be used as a basis by Staff to cut SWBT's nonrecurring costs in half.

48.   For these reasons, SWBT asks the Commission to reconsider the methodology and assumptions presented in SWBT's cost studies in this case.

Barbara A. Smith
Barbara A. Smith

STATE OF MISSOURI   )
)
CITY OF ST. LOUIS   )

Subscribed and sworn to before me on this __24__ day of August 1998.

Ken K. Selsor
Notary Public

KEVIN K. SELSOR
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP. JULY 6. 2000

Summary of Work Experience and Qualifications

Work Experience

Q. **Please outline your work experience.**

A. I began my career with Southwestern Bell in December of 1978 in the Cost
Studies organization at General Headquarters. I have held various positions in
Cost Studies from 1978 to the present. In these positions, I was responsible
for the production of cost studies and the development of cost methodologies
for various products and services for Arkansas, Kansas, Missouri, Oklahoma
and Texas. In my current position I am responsible for developing policy,
methodology and witness support for the cost studies organization.

Education Background

Q. **What is your educational background?**

A. I received my Bachelors degree from the University of Missouri in Columbia,
Missouri in 1978.

Q. **Have you previously filed testimony?**

A. Yes. I have filed testimony in the following dockets:

Date Filed	State	Proceeding Number	Subjects Addressed
1991	Texas	Docket 9695	Call Control Options
1992	Texas	Docket 10687	SmartTrunk (Direct)
1992	Texas	Docket 11177	SS7-Interconnection

Date Filed	State	Proceeding Number	Subjects Addressed
1992	Missouri	Case 93-116	Classification of Competitive Services
1993	Texas	Docket 10687/10655	SmartTrunk/DigiLine (Supplemental)
1993	Texas	Docket 12118	Caller ID
1993	Texas	Docket 10962	Open Network Architecture
1995	Missouri	Case TR-95-322	Establishment of Rate Bands for 800 MaxiMizer
1995	Missouri	Case TR-96-28	Increase in Local and Toll Operator Service Rates
1996	Texas	Docket 14940	Interim Number Portability (INP)
1996	Missouri	Case No. 96-405	Multipoint Video Service
1996	Kansas	Docket 190,492-U	General Investigation into Competition
1996	Texas	Docket 16226, 16285, 16196, 16189	Arbitration of AT&T, MCI, Teleport Communications and MFS Communications
1996	Missouri	Case Nos. 97-40, 97-67	Arbitration of AT&T and MCI
1996	Oklahoma	Cause No. PUD 960000218	Arbitration of AT&T
1996	Kansas	Docket 97-SCCC-167-ARB	Arbitration of Sprint
1997	Kansas	Docket 97-ATT-290-ARB	Arbitration of AT&T
Date		Proceeding	

Filed	State	Number	Subjects Addressed
1997	Arkansas	Docket 96-395-U	Arbitration of AT&T
1997	Kansas	Docket 97-SCCC-149-GIT	Generic Proceeding for SWBT's Rates for Interconnection. Unbundled Network Elements and Resale
1997	Kansas	Docket 97-BCSC-547-ARB	Arbitration of Boulevard Telephone Company
1997	Texas	Docket 16890	Public Coin
1997	Missouri	Case No. 98-14	Arbitration of TCG
1997	Oklahoma	Cause No. PUD 970000213	Application by Cox Oklahoma Telecom for Determination of Permanent Rates for Unbundled Network Elements of SWBT
1997	Oklahoma	Cause No. PUD 970000442	Application by SWB and AT&T for Determination of Costs and Permanent Rates for all Non-UNE SWBT Services
1998	Texas	Docket 17759	Complaint of KMC Telecom Inc. Against SWBT for Violations of Section 251 © (4) of the Telecommun8cations Act of 1996
1998	Kansas	97-SCCC-149-GIT	In the Matter of Joint Application of Sprint et al., for the Commission to Open a Generic Proceeding on SWBT Rates for Interconnection, UNE, Transport and Termination and Resale

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1997	Arkansas	Docket 96-395-U	Arbitration of AT&T
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1997	Kansas	Docket 97-BCSC-547-ARB	Arbitration of Boulevard Telephone Company
1997	Texas	Docket 16890	Public Coin
1997	Missouri	Case No. 98-14	Arbitration of TCG
1997	Oklahoma	Cause No. PUD 970000213	Application by Cox Oklahoma Telecom for Determination of Permanent Rates for Unbundled Network Elements of SWBT
1997	Oklahoma	Cause No. PUD 970000442	Application by SWB and AT&T for Determination of Costs and Permanent Rates for all Non-UNE SWBT Services
1998	Texas	Docket 17759	Complaint of KMC Telecom Inc. Against SWBT for Violations of Section 251 © (4) of the Telecommun8cations Act of 1996
1998	Kansas	97-SCCC-149-GIT	In the Matter of Joint Application of Sprint et al., for the Commission to Open a Generic Proceeding on SWBT Rates for Interconnection, UNE, Transport and Termination and Resale

Below is a DS1 IO comparison between the following studies: The AT&T "DS1 IO TOC study", the AT&T "DS1 IO UNE study" and SWBT's DS1 IO UNE study". AT&T's TOC study came in part from the AT&T binder. entitled "Digital Facility Provisioning & Maintenance (Bate Stamp 03537 - 03723)

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Below is a DS3 IO comparison between the following studies: The AT&T "DS3 IO TOC study", the AT&T "DS3 IO UNE study" and SWBT's DS1 IO UNE study". AT&T's TOC study came in part from the AT&T binder entitled "Digital Facility Provisioning & Maintenance (Bate Stamp 03537 - 03723).

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