

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Delta Phones, Inc.,)	
)	
Complainant,)	
)	
v.)	Case No. TC-2004-0064
)	
Southwestern Bell Telephone Company, L.P.,)	
d/b/a Southwestern Bell Telephone Company,)	
)	
Respondent.)	

AFFIDAVIT OF GERT ANDERSEN

STATE OF WISCONSIN)	
)	SS
CITY OF MILWAUKEE)	

COMES NOW Gert Andersen being duly sworn on his oath, and states as follows:

1. My name is Gert Andersen. My business address is 722 North Broadway, Milwaukee, Wisconsin 53202. I am the Director-Accounting Operations for SBC Services, Inc. My position involves collections from competitive local exchange companies ("CLECs") for local and collocation services provided by various incumbent local exchange carriers owned by SBC Communications, Inc., including Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri").
2. In my position as Director-Accounting Operations, I am familiar with and responsible for collection activities involving amounts owed by Delta Phones, Inc. to Southwestern Bell Telephone, L.P., including amounts owed for services provided in the State of Missouri. As of July 30, 2003, Delta Phones has an unpaid balance of \$1,323,806 to SBC Missouri for services provided in that state. Delta Phones has not made any payment for services provided in Missouri by Southwestern Bell Telephone, L.P. since March 21, 2003. Since that time, Delta Phones has incurred hundreds of thousands of dollars in unpaid charges for services rendered by Southwestern Bell Telephone, L.P. in Missouri.

3. Although required to do so by the terms of its interconnection agreement, Delta Phones has not paid undisputed charges nor has it paid disputed charges into escrow for services provided by Southwestern Bell Telephone, L.P. in Missouri.


Gert Andersen

Subscribed and sworn to before me this 15th day of August, 2003.


Notary Public

