

Exhibit No:
Issues: Directory Services
Witness: Sandy M. Moore
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Southwestern Bell Telephone, L.P. d/b/a SBC
Missouri
Case No: TO-2005-0035
Date Prepared: January 21, 2005

SOUTHWESTERN BELL TELEPHONE, L.P. d/b/a SBC MISSOURI

CASE NO. TO-2005-0035

SURREBUTTAL TESTIMONY

OF

SANDY M. MOORE

Hoffman Estates, Illinois
January 21, 2005

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Second Investigation into the State of)
Competition in the Exchanges of Southwestern Bell) Case No. TO-2005-0035
Telephone, L.P., d/b/a/ SBC Missouri.)

AFFIDAVIT OF SANDY MOORE

STATE OF ILLINOIS)
) SS
CITY OF HOFFMAN ESTATES)

I, Sandy Moore, of lawful age, being duly sworn, depose and state:

1. My name is Sandy Moore. I am presently Executive Director – Consumer Marketing, Core Voice Services for SBC Operations, Inc.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.


Sandy Moore

Subscribed and sworn to before this 20th day of January, 2005


Notary Public

My Commission Expires: 3-25-06



SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A SBC MISSOURI
SURREBUTTAL TESTIMONY OF SANDY MOORE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Sandy M. Moore, and my business address is 2000 W. SBC Drive, Hoffman Estates, Illinois.

Q. ARE YOU THE SAME SANDY M. MOORE THAT PREVIOUSLY FILED DIRECT TESTIMONY IN THIS CAUSE?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to comment on Staff witness Mr. Walter Cecil's rebuttal testimony pertaining to directory assistance services (DA).

Q. MR. CECIL'S TESTIMONY AT P. 3 STATES THE DIRECT TESTIMONY THAT YOU FILED IN THIS CASE IS NEARLY IDENTICAL TO THE TESTIMONY PRESENTED IN CASE NO. TO-2001-467. DO YOU AGREE WITH THIS STATEMENT?

A. No. While I agree that the competitive DA alternatives outlined in Case No. TO-2001-467 are nearly identical to the competitive alternatives outlined in this case, my testimony is substantially different from what I filed in 2001. My testimony in this case outlines how the usage of these alternatives has continued to grow. This is substantiated by

1 industry information outlining the growth of wireless and internet penetration as well as
2 SBC's DA volume decline, and the market share study results presented in my direct
3 testimony.

4
5 **Q. MR. CECIL'S REBUTTAL TESTIMONY OUTLINES SOME CONCERNS**
6 **THAT HE HAD WITH THE DA MARKET RESEARCH STUDY CONDUCTED**
7 **BY SBC. HIS FIRST CONCERN WAS THAT THE UNDERLYING**
8 **STATISTICAL INFORMATION IS NOT AVAILABLE TO SUPPORT ANY**
9 **ANALYSIS. CAN YOU PROVIDE ANY ADDITIONAL INFORMATION**
10 **CONCERNING THIS ISSUE?**

11 **A.** SBC did provide the numerical response to each question choice, the percentage
12 response to each question choice and the sampling error associated with each answer
13 choice for both the total survey and for Missouri respondents in response to PSC Staff
14 Request No. 49. However, the response was timely provided on December 20, making it
15 unavailable for inclusion in Mr. Cecil's rebuttal testimony. which was filed December 17,
16 2004.

17
18 **Q. MR. CECIL, AT P. 5, ALSO OUTLINED CONCERN WITH THE SCREENING**
19 **THAT SBC UTILIZED IN ITS DA MARKET RESEARCH STUDY,**
20 **SPECIFICALLY THAT SBC ELIMINATED POSSIBLE RESPONDENTS WHO**
21 **DID NOT USE TELEPHONE OR ON-LINE METHODS FOR OBTAINING DA**
22 **IN THE LAST 90 DAYS. CAN YOU COMMENT ON THIS CONCERN?**

1 A. SBC screened in this manner since the primary objective of this study was to understand
2 why customers utilize the sources that they do for DA and to also understand specifically
3 why they utilize 411 service. SBC's screening in this study resulted in understating the
4 competitive nature of this service. If SBC did not screen in this manner, white/yellow
5 page directory usage and on-line usage would be higher than depicted in this study and
6 use of 411 and other alternatives would be lower.

7

8 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

9 A. Yes, it does.