BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service and The Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri.	)))))	Case No. TR-2001-65

SBC MISSOURI'S RESPONSE TO
STAFF'S SECOND PHASE PROPOSAL

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (SBC Missouri), and for its Response to Staff's Second Phase Proposal, states to the Missouri Public Service Commission (Commission) as follows:

1. As the Commission noted in its June 16, 2003, Order Directing Filing, this case was established as a follow-up to an earlier case, Case No. TO-99-596, in which the Commission conducted an investigation into provisions of orders granting certification which capped competitive local exchange carriers' (CLECs') switched access rates in exchange for granting CLECs competitive classification under Section 392.361.3 RSMo. 2000.[1] Beginning in 1996 when CLECs first started seeking certification in Missouri, numerous parties, including the Commission Staff, SBC Missouri, and CLECs, agreed and stipulated to the Commission that all services offered by CLECs -- including switched exchange access service -- could be classified as "competitive" telecommunications services, and CLECs could be classified as "competitive telecommunications companies," under Section 392.361.3 RSMo. 2000, so long as CLECs agreed to cap their switched access rates at the level of the incumbent LEC. At that time, and up through the hearing in this case, nearly all parties have

[1] Order Directing Filing, p. 1.

recognized that the provision of switched exchange access service by CLECs was not truly a competitive service, but were willing to treat it as such subject to appropriate conditions that would restrain CLECs from imposing excessive rates for exchange access service.

2. In its June 1, 2000 Order in Case No. TO-99-596, the Commission determined that a cap on CLEC access rates was in the public interest and should be maintained, but should apply on an incumbent LEC-specific basis. Thus, where a CLEC competes against SBC Missouri, the CLEC's access rates in SBC Missouri's exchanges would be capped at SBC Missouri's lower level, while the CLEC's access rates in the Sprint exchanges would be capped at the higher Sprint level.

3. In its June 1, 2000 Order in Case No. TO-99-596, the Commission determined that the exchange-specific CLEC access rate cap mechanism it adopted should be an "interim" solution. The Commission did so because it found that there was not sufficient evidence in the record regarding CLECs' costs to provide switched exchange access service. The Commission indicated that it would open a new case (the present case) to investigate the cost of providing switched exchange access service, and to develop a permanent, long term solution which would result in just and reasonable rates for CLECs' switched exchange access services, while continuing to permit CLECs to be classified as "competitive telecommunications companies" under Section 392.361.3 RSMo. 2000.

4. The appropriate scope of this case was reflected in its caption:

> In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service and the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri.

This caption is consistent with the lengthy history of this case, and established a clear two-fold purpose of this case. This case was established to (1) obtain additional evidence regarding the *cost* of providing switched exchange access service (which the Commission previously found was lacking from the evidentiary record in Case No. TO-99-596), and (2) based upon that cost evidence, determine whether the access rate cap solution adopted by the Commission on an "interim" basis in June, 2000, should be made permanent, or some other permanent solution adopted.

5. This brief history of this case is important because it illustrates how far off track some parties have attempted to derail this case for their own benefit. This history is also important because it illustrates why Staff's proposal for a second phase of this case is ill-conceived.

6. Instead of detailing a straight forward proposal for a meaningful second phase of this case, Staff simply proposes that the Commission decide the costing issues identified by the parties at the hearing conducted in this case in September, 2002. Clearly, no second phase of this case is necessary to determine the general type of costing methodology that is appropriate to estimate the cost to provide exchange access service. Next, Staff proposes that the Commission further expand the scope of this case to include contentious and irrelevant issues from the Commission's Missouri universal service fund (MoUSF) case (Case No. TO-98-329). Clearly, those issues have absolutely no place in this case. Finally, Staff proposes that the Commission open a new case (with a new caption that recognizes Staff is proposing to fundamentally change the purpose of this case as originally intended by the Commission), in which the

Commission would determine whether current exchange access rates are "just and reasonable."

7. Staff's proposal misses the mark in nearly all respects. Instead of continuing to expand the scope of this case, injecting MoUSF high cost fund issues into this case, and opening a new case to examine whether current exchange access rates are "just and reasonable," the Commission should instead decide the one central issue this case was opened to address, i.e., "Is the current capping mechanism for intrastate CLEC access rates appropriate and in the public interest?"[2] To this question, the answer is unequivocably "yes."

8. At the week-long hearing in this case, numerous parties, including Staff, presented substantial information to the Commission regarding the costs incurred to provide switched access service in Missouri. Several parties, including SBC Missouri, presented evidence regarding the forward-looking, long run incremental cost to provide switched access service. Other parties, primarily the small incumbent LECs, argued that their costs to provide switched access service should be based on their historical costs as determined under Parts 36 and 69 of the FCC's interstate rules, and presented information regarding those costs to the Commission. The Commission Staff hired a consultant who submitted reams of information and testimony regarding his estimates of the costs to provide switched access service in Missouri, utilizing a variety of costing methodologies.

9. At the hearing, the diverse parties to this case were not able to agree on a single cost estimate relating to CLECs' provision of switched access services, nor did the parties agree on a single cost methodology or input values to determine such a cost

[2] See, Joint Issues List, Issue 5.

estimate. As a result, the cost estimates vary widely. On the central relevant issue in this case, however, there was widespread agreement that the cost information presented to the Commission supported a Commission decision to make permanent the CLEC access rate cap mechanism it adopted on an "interim" basis in Case No. TO-99-596. No CLEC presented any evidence of its own costs to provide switched exchange access service, and no CLEC argued that the Commission should not adopt, on a permanent basis, the incumbent LEC-specific access rate cap the Commission adopted on an interim basis in Case No. TO-99-596. Under these circumstances, it is clear that a cap on CLEC switched exchange access rates remains appropriate and should be made permanent in this proceeding.

10. No second "phase" of this case is either necessary or appropriate. The purpose of this case -- to determine whether the interim CLEC access rate capping mechanism adopted in Case No. TO-99-596 should be made permanent -- has been satisfied. The overwhelming evidence in this case is that the access rate cap mechanism the Commission adopted on an interim basis in Case No. TO-99-596 is in the public interest, and should be adopted on a permanent basis.

11. If the Commission desires to investigate whether the existing switched exchange access rates of rate of return regulated incumbent local exchange carriers (ILECs) are "just and reasonable," it should open a new case to do so. As SBC Missouri has repeatedly pointed out in this case, SBC Missouri believes it would be appropriate -- and within the scope of the Commission's authority -- to investigate the intrastate switched exchange access rates of rate of return regulated ILECs. Among other impacts, these high switched access rates disincent other local carriers from offering expanded

rural calling plans, and disincent interexchange carriers from serving or continuing to serve rural areas.

12. The Commission should not and indeed cannot utilize a second phase of this case, or a new case, to take any action with respect to the current switched exchange access rates of price-cap regulated ILECs, including SBC Missouri. Staff proposes that a second phase of this case could include an examination of "whether the current exchange access rates are just and reasonable, and to identify solutions for exchange access reform."[3] However, with respect to price cap regulated ILECs, the Commission has no authority under the price cap statute (Section 392.245 RSMo. 2000) to force an ILEC subject to price cap regulation to lower its switched access rates.

13. Section 392.245 RSMo. 2000 contains a comprehensive regulatory framework applicable to price cap regulation in Missouri. Section 392.245.1 RSMo. 2000 defines "price cap regulation" as follows:

> As used in this chapter, "price cap regulation" shall mean establishment of maximum allowable prices for telecommunications services offered by an incumbent local exchange telecommunications company, which maximum allowable prices shall not be subject to increase except as otherwise provided in this section.

Under Section 392.245.2 RSMo. 2000, a large incumbent LEC (such as SBC Missouri) shall be subject to price cap regulation:

> Upon a determination by the commission that an alternative local exchange telecommunications company has been certified to provide basic local telecommunications service and is providing such service in any part of the large incumbent company's service area.

While price cap regulation is mandatory for large incumbent LECs once the threshold criteria contained in the statute is met, Section 392.245.2 RSMo. 2000 provides that price

[3] Staff, Second Phase Proposal, p. 10.

cap regulation is optional for small incumbent LECs, who may *elect* to be regulated under price cap regulation once the same threshold criteria applicable to large incumbent LECs is met.

14. Section 392.245.3 RSMo. 2000 provides that the initial "maximum allowable prices" for a price cap regulated company "shall be those in effect on December thirty-first of the year preceding the year in which the company is first subject to regulation under this section." On September 26, 1997, in Case No. TO-97-397, the Commission confirmed that SBC Missouri had met the threshold criteria required for SBC Missouri to be subject to price cap regulation under Section 392.245.2 RSMo. 2000, and as a result, the "maximum allowable prices" established for SBC Missouri were those rates in effect on December 31, 1996 (i.e., December thirty-first of the year (1996) preceding the year (1997) in which SBC Missouri first met the threshold criteria to be subject to price cap regulation).

15. Under Section 392.245.4 RSMo. 2000, the "maximum allowable prices" for "exchange access and basic local telecommunications services" of a large incumbent LEC such as SBC Missouri "shall not be changed prior to January 1, 2000. After that date, the maximum allowable prices for exchange access and basic local telecommunications services are annually changed, based on one of two methods: (1) by the change in the telephone service component of the Consumer Price Index (CPI-TS) or, (2) by the change in the Gross Domestic Product Price Index (GDP-PI).[4] Pursuant to and consistent with these provisions, SBC Missouri's maximum allowable prices for switched access service have been adjusted by the change in the CPI-TS. SBC Missouri's

[4] The "maximum allowable prices" for nonbasic telecommunications services subject to price cap regulation under Section 392.245 RSMo. 2000 may be annually increased after January 1, 1999 by up to eight percent for each twelve month period, as provided under Section 392.245.11 RSMo. 2000.

switched access rates are lower today than in September, 1997 when it first became subject to price cap regulation.

16. Under Section 392.245.6 RSMo. 2000, the Commission retains jurisdiction "over quality and conditions of service or to relieve telecommunications companies from the obligation to comply with Commission rules relating to minimum basic local and interexchange telecommunications service." Under subsection 7 of Section 392.245, a telecommunications company subject to price cap regulation" shall not be subject to regulation under subsection 1 section 392.240," i.e., rate of return regulation.

17. Subsections 8 and 9 of Section 392.245 RSMo. 2000 permit certain incumbent local exchange telecommunications companies subject to price cap regulation to exercise a certain amount of "price rebalancing" by increasing their local rates and reducing their intrastate access rates:

> to a level not to exceed one hundred fifty percent of the company's interstate rates for similar access services in effect as of December thirty-first of the year preceding the year in which the company is first subject to regulation under this section.

Thus, if an incumbent LEC's intrastate access rates exceeded 150% of its interstate access as of December 31st of the year prior to becoming eligible for price cap regulation, the incumbent LEC is permitted to reduce its intrastate switched access rates to a level not to exceed 150% of its interstate switched access rates.

18. If an incumbent LEC is eligible for this provision (i.e., if the incumbent LEC's intrastate access rates exceeded 150% of its interstate access rates as of December 31 of the year preceding the year in which the LEC became subject to price cap regulation), under subsection 9 of Section 392.245 RSMo. 2000, this incumbent LEC

may offset the revenue loss resulting from the switched access service rate reduction by increasing its monthly maximum allowable prices for basic local service subject to express limitations (i.e., the annual local price increase may not exceed one dollar fifty cents). However, this limited exception to the price cap regulatory regime enacted by the Missouri legislature in Senate Bill 507 is not applicable to SBC Missouri. At the time SBC Missouri became eligible for price cap regulation, SBC Missouri's intrastate access rates did not exceed 150% of its interstate access rates, and it is therefore not eligible for the limited "rebalancing" of rates permitted under Section 8 and 9 of Section 392.245 RSMo. 2000.

19. Finally, subsections 4(5) and 11 of Section 392.245 RSMo. 2000 provide that an incumbent LEC subject to price cap regulation may change the rates for its services, consistent with the provisions contained in Section 392.200 RSMo. 2000, but not to exceed the "maximum allowable prices" established under Section 392.245 RSMo. 2000. These provisions make clear that it is the price cap regulated company, and not the Commission, which is given the authority to set its rates at any level so long as those rates do not exceed the cap.

20. Part of Staff's Second Phase Proposal is for the Commission to establish a new case to investigate whether the current switched access rates are "just and reasonable." With respect to price cap regulated ILECs, Staff's proposal is clearly inappropriate, as the Missouri legislature has already determined that issue. Against the lengthy backdrop of the detailed and comprehensive price cap regulatory regime contained in Section 392.245 RSMo. 2000, it is readily apparent that the Commission does not have jurisdiction to direct an incumbent LEC subject to price cap regulation

pursuant to Section 392.245 RSMo. 2000 to reduce its switched access rates below the "maximum allowable prices" established by Sections 392.245.3 and 4 RSMo. 2000. Section 392.245.3 and .4 RSMo. 2000 preemptively establish the maximum allowable prices an incumbent LEC subject to price cap regulation may charge. Nothing in Section 392.245 RSMo. 2000 or any other statutory provision permits the Commission to use some other metric to force a price cap regulated incumbent LEC to reduce its rates for any service below the maximum allowable prices established by Section 392.245 RSMo. 2000. In fact, subsection 7 of Section 392.245 RSMo. 2000 specifically provides that any company subject to price cap regulation under Section 392.245 RSMo. 2000 "shall not be subject to regulation under subsection 1 of section 392.240" (the statutory provision which authorizes the Commission to determine that a telecommunication company's current rates are unlawful based on traditional rate of return regulation).

21. Further, as described above, subsections 4(5) and 11 of Section 392.245 RSMo. 2000 clearly give the price cap company, not the Commission, authority to set its rates at any level which does not exceed the maximum allowable price. The comprehensive price cap regulation framework enacted by the Missouri legislature in 1996 simply does not grant the Commission any authority to reduce or otherwise change the maximum allowable prices established by Section 392.245 RSMo. 2000, except as provided therein.

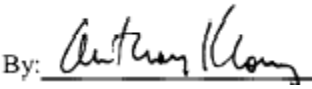
22. The Commission should reject Staff's Second Phase Proposal. To resolve this case, the Commission should order that the exchange access rate cap mechanism it adopted on an interim basis in Case No. TO-99-596 be made permanent. If the Commission is inclined to take further action with respect to access *rates*, it may only do

so with respect to non-price cap regulated companies. If the Commission believes that it has authority under the Missouri price cap statute to examine whether the existing exchange access rates of a price cap regulated ILEC are "just and reasonable," and force an ILEC subject to price cap regulation to reduce its switched access rates, the Commission should permit the parties impacted by such a decision (i.e., the ILECs subject to price cap regulation under Section 392.245 RSMo. 2000) to pursue appropriate appellate review before the Commission takes any further action in the case.

WHEREFORE, SBC Missouri respectfully requests that the Commission reject Staff's Second Phase Proposal, in whole, and instead proceed to conclude its investigation in this case as described herein.

Respectfully submitted,

Southwestern Bell Telephone, L.P.,
d/b/a SBC Missouri

By: 

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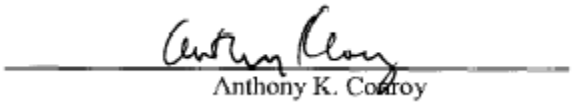
CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this document was served on all counsel of record by electronic mail or by first class, postage prepaid U. S. Mail on August 15, 2003. Notice of this filing was provided to all parties not represented by counsel, by first class, postage prepaid U. S. Mail.



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