



TECHNICAL ASSOCIATES INCORPORATED

Consulting Economists and Engineers

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September 13, 1982

Steven Dottheim, Esq.
Deputy General Counsel
Missouri Public Service Commission
Jefferson State Office Bldg.
Jefferson City, Missouri 65102

RE: Case No. TR-82-199, Southwestern Bell Telephone Company

Dear Steve:

With respect to the above-captioned case, enclosed please find:

- (1) a copy of the package of materials I sent you on September 2, 1982 but you never received -- note that another "original" verification statement is included; and
- (2) my answers to SWB's Data Request No. 9.

If you have any questions, please let me know.

Sincerely,

Michael J. Ileo
President

Enclosures

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RESPONSES TO
SWB'S DATA REQUEST NO. 9
OF DR. ILEO

- (1) Steve Dottheim will provide.
- (2) See Pages 59 & 60 of Ileo Testimony and sources in footnotes thereon. Also see Company responses to SIR's 894 and 915.
- (3) See Page 16 of Ileo Testimony.
- (4a) All documents relied upon are cited in Ileo Testimony. See Pages 20-22, 46-51 and Schedule 11. See also the various documents provided by the Company to the SIR's cited in footnotes to Schedule 11 which were read but not specifically relied upon.
- (4b) See response to (4a).
- (4c) See response to (4a).
- (4d) No documents read, reviewed, analyzed or relied upon which specifically pertain to the statement.
- (4e) See response to (4d).
- (4f) See Moody's Bond Survey and Moody's Bond Record, various issues. Too voluminous to reproduce. May be seen at offices in Richmond, Virginia.
- (4g) See response to (4a).
- (5) The terms "short-term expected inflation rate" and "long-term expected inflation rate" are not used on Page 18 of Ileo Testimony.
- (6) Documents provided by Company in response to SIR #887 as indicated below:

Competitive Tracking Study, November, 1980-August, 1981, Southwestern Bell Residence Market Research.

RESPONSES TO
SWB'S DATA REQUEST NO. 9
OF DR. ILEO

(6) Continued

Southwestern Bell, Competitive Tracking Study, December, 1980.

Key Telephone System Market, Northern Business Intelligence, April 1981, New York, NY.

Ten Year Market for Interconnect PBX's, The Eastern Management Group, June 1981, Morris Plains, N.J.

PABX Interconnect and Future Office Controller, Volume #1, Market Review & Analysis, International Resource Development, Inc., Norwalk Conn., August, 1980.

Competitive Tracking Study - Southwestern Bell Residence Market Research, April, 1981.

Southwestern Bell Competitive Tracking, February, 1981-June, 1982.

AT&T-Rival-A Competitive Analysis Tool Abstract, May, 1980 by Information Systems - Analytical Support Center.

AT&T-Competition in the Residence MTS Market, June, 1981.

(7) Data reviewed by Mr. Kenneth C. Strobl of Technical Associates, Inc. on visits to Company headquarters in St. Louis to review Southwestern Bell Corp., 6-Year Plan (1981-1986), July 1, 1981 in connection with TO-81-292, Toll Investigation.

(8) See Pages 20-22 of Ileo Testimony, although I am unaware of any specific lines of business breakdown for determining corresponding rates of return and capital structures.