

August 21, 2001

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, Mo. 65101

**FILED**<sup>2</sup> AUG 2 7 2001

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Missouri Public Service Commission

Via: Regular Mail and e-mail mschwart@mail.state.mo.us

Re: Case No. TO-2001-467

Dear Judge Roberts:

Attached for the Commission are our replies to your request for our answers to Staff's Data Request Nos. 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, and 2514.

If I can be of any further assistance, please do not hesitate to contact me at the below telephone number or address.

Sincerely,

Eileen Singleton Compliance Officer

Attachments (9)





#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

## REQUESTED FROM: CLECs a party to Case No. TO-2001-467

DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** For each SWBT exchange in which you offer service to an end-user, please indicate the number of lines that you have had in service on January 1st of each year since you began to offer service. Count residential and nonresidential customers separately.

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address: <u>http://www.psc.state.mo.us/telecommunications-dr.asp</u>. Once completed, please e-mail the form to mschwart@mail.state.mo.us no later than July 16, 2001.

**REQUESTED BY: Walt Cecil** 

INFORMATION PROVIDED

## See Excel Spreadsheet Attached

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TO-2001-467 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the , , office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to employees, contractors, agents or others employed by or acting in its behalf.

Signed by: Eine Singer



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#### MO PSC Case No. TO-2001-467 Data Request For CLECs



Use This Table for Data Request 2506

Exchange ADRIAN ADVANCE AFFTON AGENCY ALTEBGFRHN ANTONIA ARCHIE ARGYLE ARMSTRONG ARMSTRONG ARMOLD ASH GROVE BALLWIN BELLEFONTAINE NEIGHBORS BEAUFORT BELLCITY BELLCITY BELLCIN BENTON BERTON BERTON	1/1/97 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	VOICE GRA 1/1/98 0 0 0 0 0 0 0 0 0 0 0 0 0	1/1/99 0 0 0 0 0 0 0 0 0 0	ENT LINES	1/1/01 0 0	1/1/97 0 0	VOICE GRA	DE EQUIVAL 1/1/99	1/1/00	1/1/01
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BISMARCK	0	0	0	0	0	0	0		0	
BLACKWELL	Ő	0	0	0	1	0	0		0	
BLOOMFIELD	Ő	Ū Ū	0	0	a	0	0		0	
BLOOMSDALE	0	0	0	0	Ő	0	0		ő	
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BRECKENRIDGE HILLS	0	0	0	0	1	0	0	0	0	
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BRIDGETON	0	0	0	0	3	0	0	0	0	
BROOKFIELD	0	0	0	0	0	0	0	0	0	
CALVERTON PARK	0	0	0	0	1	Ö	0	0	0	
CAMDENTON	0	0	0	0	0	0	0	0	0	
CAMPBELL	0	0	0	0	0	0	0	0	0	
CAPEGIRARD	0	0	0	0	2	0	0	0	0	
CARDWELL	0	0	0	0	0	0	0	0	0.	
CARL JCT	0	0	0	0	0	0	0	0	0	
CARROLLTON	0	0	0	0	0	0	0		0	
CARTHAGE CARUTHRSVL	0	Ó	0	0	0	0	0	0	0	
CEDAR HILL	0	0	0	0	0	0	0	0	0	
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CENTER	0	0	0	0	0	0	0	0	0	
CHARLESTON	0	0	0	. 0	0	<u> </u>	0	0	0	
CHESTERFLD	0		0	0	0	0	0	0	0	
CHILLICOTH	0	0	0	0	0		<u> </u>	0	0	
CLARKSVL	0	0	0	0	0	- 9	0		0	
CLEVER	0	0	0	0	0	0	0	0	0	
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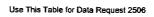
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## MO PSC Case No. TO-2001-467 Data Request For CLECs

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		i	RESIDENTIAL	-		BUSINESS VOICE GRADE EQUIVALENT LINES					
Exchange		VOICE GRA	DE EQUIVAL	ENT LINES							
	1/1/97	1/1/98	1/1/99	1/1/00	1/1/01	1/1/97	1/1/98	1/1/99	1/1/00	1/1/01	
LAT RIVER	0	0	0	0	0	0	0	0	0	0	
LORISSANT	0	0	0	0	12	Ő		Ő	0	0	
RANKFORD	Ō	0	0	0	0	0		0	0	0	
REDERCKTN	0	0	0	Ó	0	0	Ö	0	0	0	
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HILLSBORO	0	0	Ő	0	0	0		0	0	0	
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KOZKOSBCH	0	0	0	0	0	0	0	0	0	ō	
OCKWOOD	0	0	0	0	0	0	0	0		Ö	
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ARCELINE	o	ő	ŏ	0	0				0	0	
ARIONVL	0	0		0	0	0	0	0	0	0	
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ARYLAND HEIGHTS	0	0	0	0	0		0	0	Ō	0	
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# MO PSC Case No. TO-2001-467 Data Request For CLECs



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		BUSINESS								
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NEOSHO	0	0	00	0	-	0	0	0	0	1/ 1/01
NEVADA	0	0	0			0	ŏ	0	- 0	
NEW MADRID	0	0	0	0		Ō		ő	ő	_
NEWFRNKLIN	0	0	0	0	0	0		0	0	
NIXA	0	0	0	0		0	0	0	0	
ORMANDY	0	0	0	0		0	0	0	0	
NORTH COUNTY	0	0	0	0		0	0	0	0	
	0	0	0	0	_	0	0	0	Ó	
DAKVILLE DLDAPPLETN	0	0		0		0	0	Ö	<u> </u>	
DLIVETTE	0	0	0	0		0	0	0	0	
DRAN		0		0		0	0	0		
DSAGE BEACH		0	0				0	0	0	
OVERLAND	0	0	0	0			o	0	0	
PACIFIC	0	0	ő	0		0		0	0	
PAGEDALE	0	0	Ö	0		0	0	0	0	
PARKVILLE	0	0	0	0			0	0	- 0	-
ATTON	0	0	0	0		0	0	0		
PAYNESVL	0	0	0	0		ö	0	0	0	
PERRYVILLE	0	0	Ö	0	0	0	0	0	0	
PEVELY	0	0	0	0		0	0	0	- ŏ	
PIERCECITY	0	0	0	0		0	0		0	
OCAHONTAS	0	0	0	0	0	0	0	0	0	
POND	0	0	0	0		0	0	0	0	
POPLAR BLF	0	0	1	1		0	0	0	0	··
PORTAGEVL	0	0	0	0		0	0	0	0	
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RAYTOWN	0	0	0	0	· · · · · · · · · · · · · · · · · · ·	0	0	0	0	
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RICHMOND	0	0	0	0	_	0	0	0	0	
RICHWOODS	0	0	Ö	0	0	0	0	0	0	
RISCO	0	0	0	0	.0	0	0	0	0	
RIVERVIEW	0	0	0	0		0	0	0	0	
ROBERTSVILLE	- 0	0	0	0	1	0			0	
ROGERSVL	0	0	0		0		0	<u> </u>	0	
RUSHVILLE	Ő	0	Ő	0	0	0	0	0	0	
SANANTONIO	0	0	0	0	0	0	0	- 0	0	
SAPPINGTON	0	Ŏ		0	0	0		0	0	
COTT CITY	0	0	0		0			- 0		
EDALIA	0	0	0	0	Ŏ	ő	0	0	0	
SENATH	0	0	0	0		- 0	- 0		- 0	
SIKESTON	0	0	0	0	0	ŏ	ő			
SLATER	0	Ö	0	Ó	Ő	0	0	0		· · · ·
OKANSASCY	0	Ö	0	Ó	0	0	ő	ŭ	0	
OUTHVILLE	0	0	0	0	0	0	0	0		
PANISH LAKE	0	0	0	0	0	0	0	o	0	
PRINGFLD	0	0	0	. 0	0	0	0	0	0	
ST ANN	0	0	0	0	· · · ·	0	0	Ö		
ST CHARLES	0	0	0	0	5	0	0	0	0	
ST CLAIR ST JOSEPH	0	0	0	0	2	0	0	0	0	
T LOUIS	0	0	0	0	0	0	Ó	0	0	
T MARYS		0	0	0	212	0	0	0	0	
ST PETERS		0	0	0	0	<u> </u>	0	0	0	
TANBERRY	0	0	0	0	1	0	0	0	0	
TEGNVIEVE		0	0	0	0	0	0	0	0	
TRAFFORD	0			0	0	0		0	0	
IFFANYSPG		0		- 0	0		0	0		
RENTON	0	0	0	0				0	0	
USCUMBIA	0	0	0	0	0	- 0	0	0	0	
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INIVERSITY CITY	0	0	0	0	3	Ö		- 0	0	
ALLEYPARK	0	0	Ō	Ō		— ă	o			
ERSAILLES	0	0	0	0	Ó	ő	- 0			
ILLA RIDGE	0	0	0	0	2	0	0	0		•
IENNA	0	0	0	0	0	0	ő		ő	
VALNUT GRV	0	.0	0	0	0	Ő		0	0	
VARDELL	0	0	0	0	0	0		0	0	
VARE	0	0	0	0	0	0	0	ŏ	0	<u> </u>
VASHINGTON	0	0	0	. 0	3	0	- 0	0	0	
VEBB CITY	0	0	<u>.</u>	0	0	0	0	0		-
EBSTER GROVES	0	0	0	Ö	2	0	0			·



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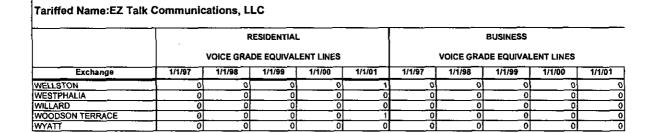
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Use This Table for Data Request 2506





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#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

#### REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

INFORMATION REQUESTED: Under what circumstances would your firm decline a request from an end-user to provide basic local telecommunications service?

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address: http://www.psc.state.mo.us/telecommunications-dr.asp. Once completed, please e-mail the form to mschwart@mail.state.mo.us no later than July 16, 2001.

#### **REQUESTED BY:** Walt Cecil

INFORMATION PROVIDED

EZ Talk Communications, LLC does not decline basic local telecommunications service from anyone. EZ Talk is a prepaid reseller of Local Exchange Service.

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TO-2001-467 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the office, or other location mutually agreeable. Where requestor to have documents available for inspection in the , , , office, or other location mutually agreeable. identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to and its employees, contractors, agents or others employed by or acting in its behalf.

Signed by:

Date Response Received:





## DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

#### REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** Please identify any existing economic or regulatory barriers to entry or exit that your firm perceives as unduly onerous.

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address: <u>http://www.psc.state.mo.us/telecommunications-dr.asp</u>. Once completed, please e-mail the form to <u>mschwart@mail.state.mo.us</u> no later than July 16, 2001.

**REQUESTED BY: Walt Cecil** 

INFORMATION PROVIDED

Even though EZ Talk is a prepaid local exchange carrier, we still must issue a disconnect notice a day after the end users renewal due date and extend their service for another 10 days resulting in and expense to EZ Talk when the end user does not renew their service. End Users prepay for their service for 1 month (30 days) not 40 days.

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Signed by:

Date Response Received:





#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

## REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** Has SWBT's Local Plus service affected your decision to provide service in Missouri? If yes, explain.

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address: http://www.psc.state.mo.us/telecommunications-dr.asp. Once completed, please e-mail the form to mschwart@mail.state.mo.us\_no later than July 16, 2001.

# REQUESTED BY: Walt Cecil

## INFORMATION PROVIDED

NO \_\_\_\_\_

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Signed by: Eine Singer

Date Response Received:



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NO. 2510

#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

#### REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** Do you consider your services to be substitutable for those services offered by SWBT and if so, are those services functionally equivalent? If yes, please explain.

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address: <u>http://www.psc.state.mo.us/telecommunications-dr.asp</u>. Once completed, please e-mail the form to <u>mschwart@mail.state.mo.us</u> no later than July 16, 2001.

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REQUESTED BY: Walt Cecil

INFORMATION PROVIDED

Yes, since EZ Talk is a reseller, we offer the same services as SWBT.

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Signed by: Eune Surgeon

Date Response Received:





#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

## REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** For facilities based CLECs (including those providing service under UNE-P), indicate the book value of your physical plant on a state-wide basis on December 31st for the years 1997, 1998, 1999, and 2000.

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

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**REQUESTED BY: Walt Cecil** 

INFORMATION PROVIDED N/A - EZ Talk Communications, LLC is strictly a reseller.

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Signed by:

Date Response Received:

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#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

#### REQUESTED FROM: CLECs a part of Case No. TO-2001-467

## DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** For CLECs, by SWBT exchange, indicate the number of lines per calendar year that you have lost to:

- i. SWBT,
- ii. All other CLECs (combined total),

iii. Or, if i and ii are unknown, indicate the total.

Do not include lines disconnected due to nonpayment.

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#### REQUESTED BY: Walt Cecil

INFORMATION PROVIDED

Being a small prepaid reseller, EZ Talk does not have the systems or data to present this information. We cannot stipulate between conversions to other companies and disconnects.

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Signed by: Eine Singer



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Date Response Received:

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#### DATA INFORMATION REQUEST Southwestern Beil Telephone

TO-2001-467

#### REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

**INFORMATION REQUESTED:** By SWBT exchange, for each year since your firm began serving end-users, list the number of complaints for poor or delayed service made against your firm by your end-users and identify the number of those complaints that are unresolved. Provide this information on an annual basis and use December 31st of each year as a cut-off date.

## HOW TO FILE A RESPONSE TO THIS DATA REQUEST

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REQUESTED BY: Walt Cecil

## **INFORMATION PROVIDED**

No complaints were filed against EZ Talk Communications, LLC in the years of 1998, 1999 or 2000 in the state of Missouri.

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Signed by Einer Singer

Date Response Received:





#### DATA INFORMATION REQUEST Southwestern Bell Telephone

TO-2001-467

#### REQUESTED FROM: CLECs a part of Case No. TO-2001-467

DATE REQUESTED: 6/25/01

INFORMATION REQUESTED: Identify those SWBT exchanges in which your firm does business but considers unprofitable.

HOW TO FILE A RESPONSE TO THIS DATA REQUEST

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Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address: http://www.psc.state.mo.us/telecommunications-dr.asp. Once completed, please e-mail the form to dhake01@mail.state.mo.us no later than July 5, 2001.

## **REQUESTED BY: Walt Cecil**

## INFORMATION PROVIDED

None\_\_\_\_\_\_

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Signed by: Eine Singer

Date Response Received: