Katherine C. Swaller
Senior Counsel

Southwestern Bell Telephone
One Bell Center, Room 3536
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Southwestern Bell

FILED
AUG 24 1998
Missouri Public Service Commission

August 24, 1998

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, MO 65101

Re: Case No. TO-98-115

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case are an original and eight redacted (NP) copies, one copy of the Highly Confidential (HC) pages and an original and six copies of the HC version of Southwestern Bell Telephone Company's Comments to Staff's Clarification to the Costing and Pricing Report, Volume 2.

Please stamp "Filed" on the extra unredacted copy and return to us in the enclosed self-addressed, stamped envelope. Thank you for bringing this matter to the attention of the Commission.

Thank you for bringing this matter to the attention of the Commission.

Sincerely,

Enclosures

cc: Parties of Record

NP

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	))))))	Case No. TO-98-115

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY TO STAFF'S CLARIFICATION TO THE COSTING AND PRICING REPORT VOLUME 2

Comes Now Southwestern Bell Telephone Company (Southwestern Bell) and for its Comments states as follows:

Procedural Background

1. In its Report and Order issued on December 23, 1997, the Commission determined that it had insufficient information to adopt permanent rates for a number of unbundled network elements and interconnection related services. The Commission directed its Arbitration Advisory Staff (AAS or Staff) to conduct an investigation and review of Southwestern Bell cost data, including meetings and interviews with Southwestern Bell personnel and to "analyze cost data provided by AT&T." See Report and Order p. 51.

2. The Commission also determined that although no hearing would be permitted, the Parties would be permitted to support their positions through affidavits, comments and post-proceeding briefs. Report and Order at pp. 52-53.

3. On July 24, 1998, the AAS filed its Report and on August 7, 1998 clarifications to the Report were filed.

Legal Issues

4. On December 29, 1997, Southwestern Bell submitted its Objections to Process for Establishing Permanent Rates. Southwestern Bell continues to be seriously concerned about the procedures used by the Commission to develop permanent rates in that those procedures do not provide due process. Without restating its position in these Comments, Southwestern Bell urges the Commission to again reconsider the defective procedural approach it has employed in this docket and allow a true hearing in this proceeding complete with testimony of the Parties, including the Advisory Staff, and the opportunity for cross examination. A copy of the previously filed Objections are attached hereto as Attachment A and incorporated herein.

Factual Issues

5. Southwestern Bell is concerned about numerous places in the AAS Report where Southwestern Bell's real and necessary activities are ignored in order to understate the Company's actual incurred costs. These comments will highlight a few of the more significant issues. Other important issues are addressed in Southwestern Bell's affidavits.

6. Southwestern Bell is presenting eleven (11) affidavits in this filing. William C. Bailey explains how the AAS has misinterpreted the Commission's arbitration award concerning "as is conversions." Barbara Smith and Barry Moore, Southwestern Bell cost experts, each address the AAS report and substantiate the costs reflected in the Southwestern Bell cost studies. Randy Vest, a Southwestern Bell operational support systems expert, demonstrates the effectiveness of Southwestern Bell's OSS and explains why the AAS report assumption of 5 percent (5%) flow through is inaccurate and

unrealistic. James Hearst, in his affidavit, rebuts the AAS report assumption that there are no test point costs when Southwestern Bell provides a loop and cross connect without testing. Merrie Owens, James White, Barbara McCrary-Bazzle, Sharon Sadlon and Leonard Ellis are all experts in the time it takes to perform the tasks for which time estimates were included in the cost studies support by Barbara Smith and Barry Moore. They are managers who spent years in craft and technical jobs and have performed hundreds of times the actual tasks for which time estimates were made. Their affidavits explain how the time estimates were developed and explain why they are accurate. These witnesses provide substantial and competent evidence to support the cost studies submitted by Southwestern Bell.

7. Southwestern Bell is most concerned with how the Report handles non-recurring charges. The Report, which is critical of Southwestern Bell time estimates, arbitrarily reduces Southwestern Bell costs by fifty percent (50%). AT&T submitted no cost estimates, and as Barbara Smith's affidavit explains, the time estimates in AT&T's TOC studies, which Southwestern Bell reviewed during discovery, are often more than the Company's estimates for similar activities. Accordingly, if a hearing were held, a reduction of Southwestern Bell's time estimates by fifty percent (50%) would be unsupported by the record. Since it would be inappropriate to make this arbitrary fifty percent (50%) reduction in an on-the-record proceeding, the Commission should not compound the problem by making a wholly unsupported adjustment while refusing to permit a hearing. SWBT has provided source affidavits which support the method utilized to develop those non-recurring cost studies.

8. Southwestern Bell is also concerned with the way the Report handles test points in the loop cross connects. The Report assumes that loops will be available without test points. The reality, as James Hearst explains in his affidavit, is that the loop and test point are tied together and whether Southwestern Bell is required to provision the loop without testing or not, the Company will still incur the cost of that test point so that it can meet its Performance Criteria obligations. Therefore those costs must be recognized in the cross connect rates.

9. Another important issue imbedded in Staff's Report concerns order mechanization. The Report assumes that all but 5 percent (5%) of all service orders will flow through mechanized Operational Support Systems (OSS) and that therefore no costs for manual intervention should be recognized beyond that 5 percent (5%) fall out factor. The reality, as explained by Randy Vest in his affidavit, is that notwithstanding SWBT's superb operational support systems, a ninety-five percent (95%) flow through rate is neither reality nor achievable. Some service order activity requires manual intervention because of the nature of the request. For example, Private Line services, AIN services and changing a residential to a business class of service, are examples of services which cannot be processed by Southwestern Bell's mechanized EASE system and must be handled manually. This is not fall out, it is simply the reality of the actual systems Southwestern Bell uses for both itself and its wholesale customers. Additionally, some orders will "fall out" of OSS if they are not properly inputted by the CLEC. As Mr. Vest explains, the cost of producing ninety-five (95%) flow through, even if it could be achieved, far outweighs its benefits. Even if Southwestern Bell's OSS had the mythical

ninety-five (95%) flow through AT&T demands and Staff assumes, AT&T could not use it! They are not ready. Had they been ready at this stage, actual testing to determine real fall out could have been included in this case.

Summary

10. Under the Act, an incumbent is required to unbundle its network and to provide access to its operational support systems (among other things). The incumbent is, however, under Section 252 (d)(1), permitted to recover its costs in meeting these statutory requirements. To arbitrarily cut costs in half or to assume hypothetical operational support systems in order to understate actual costs is unlawful and unconstitutional in that it is a taking without just compensation. In this docket, Southwestern Bell is seeking to recover only the costs allowed by the law–those costs which are substantiated by the Company's cost studies. Moreover, SWBT reiterates its position that the process adopted by the Commission to resolve these issues is unlawful in depriving SWBT of the opportunity to present its case in an on-the-record proceeding and to cross examine the positions advanced by AT&T and the arbitration Advisory Staff.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By _____

PAUL G. LANE	#27011
LEO J. BUB	#34326
ANTHONY K. CONROY	#35199
KATHERINE C. SWALLER	#34271

Attorneys for
Southwestern Bell Telephone Company
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the attached Service List by first-class postage prepaid, U.S. Mail on August 24, 1998.

Katherine C. Swaller

Paul G. Lane
General Attorney-Missouri

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Southwestern Bell

December 29, 1997

ATTACHMENT A

FILED
DEC 29 1997
PUBLIC SERVICE COMMISSION

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Re: Case No. TO-98-115

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Objections To Process For Establishing Permanent Rates.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Paul G. Lane/lm

Paul G. Lane

Enclosure

cc: All Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	)))))	Case No. TO-98-115

SOUTHWESTERN BELL TELEPHONE COMPANY'S
OBJECTIONS TO PROCESS FOR ESTABLISHING PERMANENT RATES

Southwestern Bell Telephone Company respectfully objects to the process the Missouri Public Service Commission proposes to employ in establishing permanent rates.

The issues being considered by the Commission involve substantial property interests and will have significant impacts on the competitive balance in the local exchange market. Cutting off basic procedural rights violates not only state and federal administrative procedural rules, but also fundamental due process rights protected by the Missouri and U.S. Constitutions.

During these arbitration proceedings, Southwestern Bell has consistently sought, but been denied, appropriate evidentiary hearings permitting the presentation of testimony and other evidence, cross-examination of witnesses, oral argument and briefing. All parties to these arbitration proceedings have previously expressed serious concerns that the procedure for setting permanent rates did not comport with minimum due process requirements.[1]

---

[1]Joint Application for Rehearing of MCI Telecommunications Corporation and Its Affiliates Including MCImetro Access Transmission Services, Inc. and AT&T Communications of the Southwest, Inc., Case Nos. TO-97-40 and TO-97-67, filed February 3, 1997, at p. 2; and Response of Southwestern Bell Telephone Company, Case Nos. TO-97-40 and TO-97-67, filed February 13, 1997, at pp. 1-2. See also, Southwestern Bell Telephone Company's Motion for Clarification, Modification and Application for Rehearing of Final Arbitration Order, Case Nos. TO-97-40 and TO-97-67, filed August 20, 1997, pp. 10-17.

Apparently believing it is permitted as an arbitrator to determine whether or not to conduct a hearing and what procedure to use, the Commission misunderstands it role. The Commission is not free to use whatever procedural process it chooses and its decisions are not immune from scrutiny. Perhaps it is possible for two parties to agree to an arbitration process in which the arbitrator decides whether to conduct a hearing and whether to explain its decision, all free from judicial review or scrutiny.[2] But this is not a consensual arbitration in which the parties have imbued the arbitrator with such extraordinary powers. Rather, this arbitration is being conducted by a state governmental agency pursuant to mandatory provisions of federal legislation. Constitutional due process requirements and state and federal administrative procedural rules therefore apply here. The Commission must follow them.

Background

In its December 23, 1997 Report and Order, the Commission set rates for various additional services and facilities AT&T wishes to obtain from Southwestern Bell. But the Commission indicated that the rates would be interim only and that further proceedings would be conducted to establish permanent rates. In order to implement permanent rates, the Commission directed its Arbitration Advisory Staff (AAS) to conduct an investigation, focusing on identifying the critical inputs and analyzing Southwestern Bell and AT&T's costing models. The Commission ordered the AAS to submit a report proposing permanent rates (based on the same permanent rate costing approach adopted in Case No. TO-97-40) and commenting on the

[2]But even here, the Missouri arbitration act guarantees a hearing with the right to cross-examination. Section 435.370(2) RSMo (1994)

costing approach proposed by the parties during the review process. Report and Order, pp. 51-52.

The Commission also indicated that the parties would be given an opportunity to file comments on the AAS' proposed rates and costing model and would be permitted to file affidavits and schedules to support their positions. It also stated that it would hold a hearing for the sole purpose of providing the Commission with an opportunity to ask questions of the parties, the AAS, and Office of Public Counsel. But it ruled that there will be no opportunity for cross-examination by the parties[3], although it would permit them to file post-hearing briefs. Id., p. 52.

The Commission directed that any objections to the process established in the Report and Order for the setting of permanent rates shall be filed no later than December 29, 1997. Id., pp. 54.

The Proposed Procedural Process violates Missouri and U.S. Constitutional Due Process Requirements, and State and Federal Administrative and Arbitration Procedural Requirements.

The Federal Telecommunications Act of 1996 (FTA), the right to due process contained in both the Missouri and U.S. Constitutions, the requirements of the statutes governing the Commission, the requirements of the Commission's own rules, the Missouri Administrative Procedure Act, and the Federal and State Arbitration Acts all require that significant decisions

[3]In its December 23rd Report and Order, the Commission also specifically denied Southwestern Bell's November 26, 1997 request for a contested case hearing with opportunity for cross-examination prior to the Commission's establishment of permanent rates. Report and Order, p. 53.

by a State agency adjudicating Southwestern Bell's property rights require, at the least, an on the record proceeding before the Commission in which testimony is submitted, cross-examination is permitted and an opportunity for briefing or oral argument is provided.

While it is not apparent from the FTA whether Federal or State administrative process rules apply, the process proposed by the Commission does not comport with either. Regardless of which set of administrative or arbitration rules apply to interconnection rate arbitrations under the FTA, all require notice and a full hearing with presentation of evidence and cross-examination before rates can lawfully be adjudicated.

A. The Commission's Irregular Procedure Contravenes the Parties' Due Process Rights Guaranteed by the U.S. and Missouri Constitutions.

Whether the Commission is acting as an arbitrator or otherwise, it is a state agency that must comply with the requirements of due process mandated by Article I, Sec. 10 of the Missouri Constitution and the Fourteenth Amendment to the United States Constitution. See Elmore v. Chicago & Illinois Midland Ry., 782 F.2d 94, 96 (7th Cir. 1986). Accordingly, the rules governing the conduct of private, voluntary arbitration proceedings must be supplemented to the extent necessary to satisfy procedural due process.

At a minimum, due process requires in a proceeding of this type that the "parties be afforded a full and fair hearing at a meaningful time and in a meaningful manner." State ex rel. Fischer v. Public Service Commission, 645 S.W.2d 39, 43 (Mo. App. 1982). An "essential principle of due process is that a deprivation of life, liberty or property be preceded by notice and opportunity for hearing appropriate to the nature of the case." Cleveland Bd. of Ed. v. Loudermill, 470 U.S. 532, 542 (1985) quoting Mullane v. Central Hanover Bank & Trust Co.,

339 U.S. 306, 313 (1950) (emphasis supplied). The Supreme Court has described "the root requirement" of the Due Process Clause as being "that an individual be given an opportunity for a hearing before he is deprived of any significant property interest." Id., at p. 542 quoting Bobbie v. Connecticut, 401 U.S. 371, 379 (1971) (emphasis in original).

The Commission's reliance on "evidence"gathered ex parte by the Commission's Staff without providing any party an opportunity to offer testimony and evidence in support of its own proposals or to cross-examine opposing witnesses, contest "evidence" presented by the arbitration advisory staff and to object to the proposals ultimately accepted, denies to the parties the right to a meaningful hearing. As the United States Supreme Court stated in Morgan v. United States, 304 U.S. 1 (1938): "a case in which [an agency] accepts and makes as [its] own the findings which have been prepared by the active prosecutors for the Government after an ex parte discussion with them and without according any reasonable opportunity to the respondents in the proceeding to know the claims thus presented and to contest them...is more than an irregularity in practice; it is a vital defect." See also Ohio Bell Tel. Co. V. Public Utilities Commission, 301 U.S. 292 (1937) (reliance on evidence not placed on record and not subject to scrutiny by affected parties violates fundamental requirements of due process); United Food & Commercial Workers International Union, AFL-CIO v. SIPCO., Inc., 1992 U.S. Dist. LEXIS 21332, at *29 (S.D. Iowa 1992), aff'd 8 F.3d 10 (8th Cir. 1993) (arbitrator's reliance on ex parte evidence without "opportunity to examine, object to, and cross-examine the evidence on grounds of relevance and accuracy" deprived parties of their right to a fair hearing); Totem Marine Tug & Barge, Inc. v. North American Towing, 607 F.2d 649, 651 (5th Cir. 1979) (same).

Moreover, it is clear that the procedures employed in this proceeding fail to satisfy the requirements of due process as articulated in the United States Supreme Court's decision in Matthews v. Eldridge, 424 U.S. 319 (1976). The nature of the parties' interests and the grave risk of error inherent in the Commission's reliance on ex parte evidence in this complex proceeding clearly lead to the conclusion that the parties were not afforded the process due them under the Missouri Constitution and the United States Constitution.

B. The Commission's Failure to Follow Contested Case Procedures Violated the Missouri Administrative Procedure Act and the Commission's Own Rules.

The Commission must observe the procedural requirements of the Missouri Administrative Procedure Act (MAPA), RSMo, Ch. 536. While the Commission's jurisdiction over this proceeding arises under Section 252 of the FTA, 47 U.S.C. Section 252, that legislation neither mandates particular procedures to be followed by the Commission nor preempts, expressly or by implication, otherwise applicable procedural requirements mandated by state law. (See 47 U.S.C. Section 252(e)(3)). The Commission itself has acknowledged that state procedural law applies to this proceeding in that it has allowed the Office of the Public Counsel to participate in this proceeding as required by Section 386.710 RSMo (1994).[4]

As an agency of the state within the meaning of Section 536.010(1) RSMo (1994), the Commission is subject to the requirements of the MAPA. See State ex rel. St. Louis Public Service Co. v. Public Service Commission, 365 Mo. 1032, 291 S.W.2d 95, 98 (Mo. banc 1956); State ex. rel Fischer v. Public Service Commission, 645 S.W.2d 39, 42 n.3 (Mo. App. 1982). As

[4]Initial Order, p. 4.

explained in State ex rel. Monsanto Company v. Public Service Commission, 716 S.W.2d 791, 796 (Mo. 1986): "The Public Service Commission is a creature of statute and can function only in accordance with statutes. Where a procedure before the Commission is prescribed by statute, that procedure must be followed."

The MAPA mandates extensive procedures governing any contested case. See, Sections 536.063, 536.067, 536.070, 536.073, 536.077, 536.070, 536.090 RSMo (1994). This proceeding is a "proceeding before an agency in which legal rights, duties or privileges of specific parties are required by law to be determined after hearing," Section 536.010(2) RSMo (1994), and thus, is a "contested case" with the meaning of the MAPA. As explained by the Missouri Supreme Court in State ex rel Yarber v. McHenry, 915 S.W.2d 325, 328 (Mo. 1995), if any proceeding before any agency involves issues in which a hearing is mandated by law, including "any statute or ordinance, or any provision of the state or federal constitutions" that hearing "must be conducted according to contested case procedures." Clearly, a proceeding involving the establishment of permanent rates or terms of service, a hearing is mandated by several sources of law including, but not limited to, Section 252 of the FTA, Sections 386.410 and 386.420 RSMo, Article I, Section 10 of the Missouri Constitution, and Section 1 of the Fourteenth Amendment to the U.S. Constitution. See State ex rel. Chicago, R.I. & P.R.R. v. Public Service Commission, 355 S.W.2d 45, 52 (Mo. banc 1962); State ex rel. Fischer v. Public Service Commission, 645 S.W.2d 39, 42-44 (Mo. App. 1982); Morgan v. United States, 304 U.S. 1 (1938); Ohio Bell Telephone Company v. Public Utilities Commission, 301 U.S. 292 (1937); Interstate Commerce Commission v. Louisville & Nashville R. Co., 227 US. 88 (1913).

The Commission's proposed procedure also violates Section 386.410 RSMo (1994), which requires that "[a]ll hearings before the Commission . . . shall be governed by rules to be adopted and prescribed by the Commission." Here, the proposed procedure is inconsistent with the requirements of 4 CSR 240-2.110 and Section 386.420.1 which entitles the parties the right to be heard and present evidence.

The Commission plainly violates MAPA's requirements and its own rules governing contested cases by, inter alia, failing to conduct a hearing, depriving the parties of an opportunity to examine the evidence upon which the Commission relied for its order, failing to provide an opportunity to the parties to present evidence and cross-examine opposing witnesses, and failing to provide an opportunity for the parties to submit full briefs and argument.

C. The Commission's Procedure Violates the Missouri Uniform Arbitration Act and the Federal Arbitration Act Which Provides the Right to Be Heard, Present Evidence and Cross-Examine Witnesses.

Even if it should be determined that the statutory procedures described above are inapplicable to this proceeding, the Commission's proposed procedure to establish final rates is nonetheless unlawful for failing to comply with appropriate procedural requirements. The Commission's procedures exceeded the Commission's powers because such procedures violate the requirements of the Missouri Uniform Arbitration Act, Section 435.370 RSMo (1994). That section provides the parties to an arbitration with a right to a hearing in which "[the parties are entitled to be heard, to present evidence material to the controversy and to cross-examine witnesses appearing at the hearing." Moreover, the Commission's failure to conduct the proceedings in a manner consistent with these requirements would substantially prejudice the rights of Southwestern Bell within the meaning of Section 435.405(4) RSMo (1994).

The Federal Arbitration Act similarly requires a hearing. Under 9 U. S.C. Section 10(a)(3), awards are to be set aside when, inter alia, the arbitrators are "guilty of misconduct . . in refusing to hear evidence pertinent and material to the controversy, or of any other misbehavior by which the rights of any party have been prejudiced." Parties to an arbitration are entitled to a full and fair hearing on the merits, and the courts will not hesitate to overturn an award when such righ¥ ¤[¤[ï¤[îÿ i.¥ ts are violated. See, e.g, Korikar Maritime Enterprises S.A. v. Cor Belge D'Affretement, 668 F.Supp. 267, 271 (S.D.N.Y. 1987); Petrol Corp. V. Groupement D'Achat Des Carburents, 84 F.Supp. 446, 448 (D.C.N.Y. 1949).

Conclusion

The Commission's proposed procedure to establish permanent rates violates not only state and federal administrative procedural rules, but also fundamental due process rights protected by the Missouri and U.S. Constitutions. Southwestern Bell respectfully requests that the Commission instead conduct appropriate evidentiary hearings permitting the presentation of testimony and other evidence, cross-examination of witnesses, oral argument and briefing.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY Paul G. Lane /tm

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on December 29, 1997.

Paul G. Lane /pm

Paul G. Lane

PENNY G. BAKER
MISSOURI PUBLIC SERVICE COMMISSION
301 W. HIGH STREET, SUITE 530
JEFFERSON CITY, MO 65101

MICHAEL F. DANDINO
SENIOR PUBLIC COUNSEL
OFFICE OF THE PUBLIC COUNSEL
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2345 GRAND BLVD., SUITE 2500
KANSAS CITY, MO 64108

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for second Arbitration pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company	))))))	Case No. TO-98-115

AFFIDAVIT OF WILLIAM C. BAILEY

I, William C. Bailey, of lawful age, being duly sworn, depose and state:

1. My name is William C. Bailey. I am presently Executive Director-Regulatory and Industry Relations for Southwestern Bell Telephone Company ("SWBT"). My business address is One Bell Center, Room 4202, St. Louis, Missouri 63101.

2. I have been involved in regulatory proceedings in Missouri since 1976, when I jointed the cost studies organization at SWBT's general headquarters. In that department, I was responsible for the completion of cost studies and the development of cost methodologies for various products and services of SWBT. On February 1, 1986, I assumed the title of District Manager-Rate Administration in the Missouri organization, and had responsibility for reviewing cost studies and presenting rates based on those cost studies. In February 1997 I was appointed to my present position.

3. SWBT disagrees with Staff's service order clarifications regarding "As Is" conversion of Unbundled Network Elements (UNEs) on pages 8 and 9 of the Arbitration Advisory Staff's Costing & Pricing Report, Volume 2; filed July 24, 1998. SWBT cannot be required to perform "As Is" conversions of UNEs. The 8th Circuit Court decision states that the

RBOCs cannot be required to combine UNEs. To require "As-is" conversion of UNEs is to require combining which is a violation of the 8th Circuit Court's decision.

4. Staff clarifications of rate applications on pages 8 and 9 (attached as schedule 1) ignore costs SWBT incurs when performing service order work. Schedule 2 demonstrates the correct application of service order and non-recurring rates.

5. In addition to ignoring costs incurred, Staff's proposed clarification ignores the reality of the application of Non-Recurring Charges (NRCs). Staff omissions are demonstrated in schedule 2. The errors pointed out below, if not corrected, would violate the Federal Telecommunications Act of 1996 by preventing SWBT from recovering legitimate costs.

a. Example 1 omits any non-recurring charges associated with the Loop and 2 necessary cross connects. The cross connects connect the loop to the collocation cage and the port to the collocation cage.

b. Example 2 omits a necessary cross connect that connects the port to the collocation cage.

c. Example 3 includes all necessary rate elements but Staff proposes rate levels that are ½ of SWBT's proposed rates. The justification for SWBT nonrecurring rates are contained in the affidavits of Barbara Smith and Barry Moore which have been submitted in the proceeding.

d. Example 5 omits 2 necessary cross connects both (recurring & non-recurring charges) and omits non-recurring charges for the Loop. The cross connects required are between the loop and the collocation cage and the port and the collocation cage.

e. Example 6 omits non-recurring charges for Dedicated Transport.

f. Example 7 omits a dedicated transport cross connect required to provide the service.

6. Schedule 3 demonstrates the financial impact of Staff's proposals on each example Staff has presented.

Further, affiant sayeth not.

William C. Bailey

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

Subscribed and sworn to before me this 24 day of August, 1998.

NOTARY PUBLIC
KEVIN
K
SELSOR
SEAL
STATE OF MISSOURI

Notary Public

KEVIN K. SELSOR
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP. JULY 6, 2000

Service Order Clarification

Staff believes it would be useful to the parties if the Commission clarified the application of service order charges. Staff offers the following scenarios as to how the service orders charges should apply.

1. As is UNE conversion -- Loop and line side port combination only

	Recurring	NRC
2-wire analog Loop Recurring (Group A)	$33.29	
Port Recurring	$2.47	
As is conversion charge		$5.00
Total	**$35.76**	**$5.00**

Local switching/tandem switching charges apply and are dependent upon MOU.

2. New service -- loop, line side port, and cross connect to CLEC collocated equipment with call waiting

	Recurring	NRC
2-wire analog Loop Recurring (Group C)	$18.23	$26.07
2-wire analog line side port Recurring	$2.25	$39.37
2-wire analog crossconnect w/o testing	$0.31	$19.96
Call Waiting		$ 0.18
New Service Charge		$ 2.11
Total	**$20.79**	**$87.69**

Local switching/tandem switching charges apply and are dependent upon MOU.

3. Customer currently has service through facilities and requests call waiting, caller ID, and call forwarding combination.

	Recurring	NRC
Feature activation charge for combination		$0.18(Staff estimate)
Customer change charge		$2.09
Total		**$2.27**

4. Total Services Resale - residential - as-is conversion -- 19.2 percent discount

	Recurring	NRC
Rate Group A	$6.11	
Conversion Charge		$5.00
Total	**$6.11**	**$5.00**
Rate Group D, MCA-2	$10.10	
Conversion Charge		$5.00
Total	**$10.10**	**$5.00**

Under resale service, tariffed rates less the 19.2 percent discount apply.

5. As is UNE conversion -- Loop and line side port combination -- customer requests call waiting.

	Recurring	NRC
2-wire analog Loop Recurring (Group A)	$33.29	
Port Recurring	$2.47	
Feature Activation -- Call waiting		$0.18
As is conversion charge		$5.00
Total	**$35.76**	**$5.18**

Local switching/tandem switching charges apply and are dependent upon MOU.

6. As is conversion -- 10 miles of DS-1 dedicated transport in Rate Group B

	Recurring	NRC
Dedicated transport, first mile	$86.96	
Additional miles	9 * $1.67	
Service Order charge		$54.29
Total	**$101.99**	**$54.29**

7. New service -- 10 miles of DS-1 dedicated transport in Rate Group B

	Recurring	NRC
Dedicated transport, first mile	$86.96	$184.84
Additional miles	9 * $1.67	$184 + 8*118.14
Service Order charge		$105.20
Total	**$101.99**	**$1,419.16**

SWBT Proposed Service Order Clarification

For all the scenarios offered by the Staff Service Order Charges (SOC) would apply. SOC's are charges associated with processing a service order. When ordering Unbundled Network Elements (UNEs) Non-Recurring Charges would be applied to recover one time costs associated with provisioning the UNE. Minutes of Use (MOU) Charges would also apply for all originating and terminating calls involving a UNE switch port. The Term "Conversion" is only applicable in the resale environment and is not applicable for UNE services.

Example 1:
If a collocated Local Wholesale Customer wanted to order loops and port UNEs, SWBell would apply the following charges:

	Monthly Recurring	Initial NonRecurring
2-wire Analog Loop (Group A)	$33.29	$53.20
2-wire Analog Loop to Collocation Cross Connect	$ 2.15	$71.25
Analog Line Port	$ 2.47	$39.37
2-wire Analog Port to Collocation Cross Connect	$ 2.15	$71.25
Service Order Charge		
Simple Mechanized		$ 5.00
Total	**$ 40.06**	**$240.74**

Note: this end-user will become a "new" UNE customer.

Example 2:
If a collocated Local Wholesale Customer wanted to order UNE elements including loops and a port with the call waiting vertical feature and did not require testing of its cross connects, SWBell would apply the following charges:

	Monthly Recurring	Initial NonRecurring
2-wire Analog Loop (Group C)	$18.23	$26.07
2-wire Analog Loop to Collocation Cross Connect (w/o test)	$ .31	$19.96
Analog Line Port	$ 2.25	$39.37
2-wire Analog Port to Collocation Cross Connect (w/o test)	$ .31	$19.96
Call Waiting		$ 2.27
Service Order Charge		
Simple Mechanized New		$ 5.00
Total	**$21.10**	**$112.63**

Example 3:
If a collocated Local Wholesale Customer wanted to add Analog Port vertical features to an existing UNE Analog Port (Call waiting, caller ID and Call forwarding), SWB would apply the following charges:

	Monthly Recurring	Initial NonRecurring
Call Waiting		$ 2.27
Caller ID		$ 2.27
Call Forwarding		$ 2.27
Service Order Charge		
Simple Mechanized Change		$ 5.00
Total	**No additional Monthly Recurring Charges**	**$11.81**

Example 5:

This Example would be very similar to Example 2. If a collocated Local Wholesale Customer wanted to order UNE elements including loops and a port with the call waiting vertical feature for an end-user not currently receiving UNE services, SWB would apply the following charges:

	Monthly Recurring	Initial NonRecurring
2-wire Analog Loop (Group C)	$33.29	*$53.20*
2-wire Analog Loop to Collocation Cross Connect	$ *2.15*	*$71.25*
Analog Line Port	$ 2.47	$39.37
2-wire Analog Port to Collocation Cross Connect	$ *2.15*	$71.25
Call Waiting		$ 2.27
Service Order Charge		
Simple Mechanized New		$ 5.00
Total	**$40.06**	**$ 242.74**

Note: Local Wholesale Customer could provision their own cross connects to connect the loop to/from the MDF and the Port to/from the MDF.

Example 6:

If a collocated Local Wholesale Customer wanted to add 10 miles of DS1 Dedicated Transport (rate group B) to an end users existing UNE DS1 Entrance Facility, SWB would apply the following charges:

	Monthly Recurring	Initial NonRecurring
Dedicated Transport, first mile	$ *86.96*	*$309.00*
Additional miles	*$15.03*	
Dedicated Transport Cross Connect	$ *12.00*	$ *99.00*
Service Order Charge		
Complex Manual or Mechanized Change		$136.00
Total	**$113.99**	**$544.00**

Example 7:

If a collocated Local Wholesale Customer wanted to provide to a new UNE customer 10 miles of DS1 Dedicated Transport (rate group B) UNE services that would be connected to the Local Wholesale Customers existing facilities, SWB would apply the following charges:

	Monthly Recurring	Initial NonRecurring
Dedicated Transport, first mile	$ *86.96*	*$184.84*
Additional miles	*$15.03*	$ 1063.26
Dedicated Transport Cross Connect	$ *12.00*	$ *9.41*
Service Order Charge		
Complex Manual or Mechanized New		$245.00
Total	**$113.99**	**$1493.10**

	SWBT PROPOSED RATES (Sched. 2)	STAFF PROPOSED RATES (Sched. 1)	DIFFERENCE
Example 1			
NONRECURRING	$240.74	$5.00	$235.74
RECURRING	$40.06	$35.76	$4.30
Example 2			
NONRECURRING	$112.63	$87.69	$24.94
RECURRING	$21.10	$20.79	$0.31
Example 3			
NONRECURRING	$11.81	$2.27	$9.54
RECURRING	N/A	N/A	N/A
Example 5			
NONRECURRING	$242.74	$5.18	$237.56
RECURRING	$40.06	$35.76	$4.30
Example 6			
NONRECURRING	$544	$54.29	$489.71
RECURRING	$113.99	$101.99	$12.00
Example 7			
NONRECURRING	$1493.10	$1419.16	$73.94
RECURRING	$113.99	$101.99	$12.00

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Arbitration pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company	))))))	Case No. TO-98-115

AFFIDAVIT OF MIKE MICHALCZYK

I, Mike Michalczyk, of lawful age, being duly sworn, depose and state:

1. My name is Mike Michalczyk, I am Area Manager-Network I/M Operations for Southwestern Bell Telephone Company (SWBT). My business address is 530 McCullough, Room 3-P-10, San Antonio, Texas 78215.

2. My responsibilities include network operations support of designed and non-designed installation and maintenance (I/M) services and cable repair. I provide support to field operations through clarification, modification and training of existing methods and procedures.

3. I also have new products, services and technologies development responsibilities. I participate on product teams, identifying network I/M operational needs (requirements, OSS integration, functionality, costs, objectives, time frames, etc.), provide data required for business case creation, and negotiate with outside vendors for network compatible equipment. I prepare operational test plans, assist with testing in lab and field environments, identify network operational flows, prepare operational procedures for I/M forces and assist field I/M forces with implementation of new products and services.

4. I have been an employee of Southwestern Bell Telephone Company since 1971. I began as a network I/M workcenter stockman while attending the University of Oklahoma, and upon receiving my degree in 1972, was promoted into management. I have a broad background in network operations, with multi-level management experience in both line and staff positions. My experience includes management of forces responsible for designed and non-designed I/M, cable repair, maintenance center operations, provisioning, designed and non-designed outside plant engineering, pair gain and loop electronics, fiber optics, high capacity services, data, PBX, key systems, and CPE. In my current position, I have been successful in the development and integration of new technologies within SWBT.

5. Throughout my career, I have attended technical and administrative training courses to maintain my knowledge of leading edge technology. I am considered a Subject Matter Expert, SME, for network operations. I strive to maintain my expertise through continued training, development and close interaction with field technical forces. Participation on new product and services teams continues to improve my knowledge of, and ability to support reliable, effective and efficient and technologies used within Southwestern Bell Telephone Company.

6. I/M stands for installation and maintenance; it includes the activities such as receipt and analysis of service order and repair work requests, operation of vehicles used in the performance of work functions, cross connect terminations at copper and fiber optic interfaces and terminals, placement of: electronic circuit cards at remote interfaces, terminals and customer premises, network interface devices, network terminating equipment, electronic multiplexing equipment, CPE, inside wire and connecting blocks, and terminal equipment. I/M technicians perform circuit and equipment turn-up and acceptance testing and analyze, isolate and repair

trouble reports (with appropriate test equipment). I/M technicians interface with network operating systems and test access points with technician access devices and test equipment, communicate with support center personnel, and perform end to end testing with customers or their agents when appropriate. I/M technicians perform administrative functions with service order and repair activity to ensure customer records are understood and requested service is completed correctly. I/M technicians attend technical training courses and receive refresher on the job training to maintain their knowledge of SWBT's network and technology changes.

7. I am responding to issues concerning the I/M activities accounted for in nonrecurring cost studies associated with loop and NID.

8. I assisted the Cost Study group by organizing the development of the data request packages used in Missouri to develop nonrecurring cost studies for Special Access Services, as well as UNEs underlying these types of services, such as metallic 8dB loops, DS1, etc. The facility types covered range from simple metallic services to optical service. Each service type was separated into logical sub-tasks, with each task defined by beginning function, work activity and ending function. The data requested for each sub-task included the level of the person who normally performs the activity and an estimate of time to perform the activity. I prepared these definitions, along with the assistance of two other managers also skilled in this area, to delineate the precise activities that would accompany each element. There are similar "sub-tasks" for each element under study, (e.g., metallic 8dB loop, DS1, etc.).

9. The Cost Study group requested my (Mike Michalczyk) assistance in verifying, or revising previously collected time estimates for a nonrecurring UNE cost study. The data request was formatted using an Excel Spreadsheet and I distributed a copy of the request to technical staff managers responsible for network I/M services in each SWBT market areas. Along with the

"sub-task" descriptions which served as the basis for the exercise, these managers, all of whom are known to me and have performed similar tasks at my direction for other services, forwarded the data request forms to supervisors directly responsible for the I/M activities associated with the services types requested. The completed data forms were returned to the staff managers who reviewed them, checking for reasonable and complete data. The forms were then forwarded to me, and I also checked for reasonable and complete data. If the data was found to be unreasonable or incomplete, by the staff manager or myself, the supervisor that recorded the data was contacted. After reviewing the sub-task definition, the data was verified correct, or modified as appropriate.

10. The staff managers that received the data request each had over twenty years of experience with Southwestern Bell Telephone within network operations. Their backgrounds covered many areas of network operations, but all having experience with designed network operations. The supervisors that completed the data requests all had direct responsibility for the types of services being studied. Their experience in network operations averaged over fifteen years of service.

11. Cost study personnel requested time estimates for specific UNE facility types and services, specifically those on the "sub-task lists." The data necessary for the study was formatted as described above, and forwarded to me, Mike Michalczyk, with a request to have the field technical forces with the appropriate base knowledge, complete and return the provided data forms.

12. The time estimates were developed to be reflective of an "average skill level" of the technicians (group 1 craft) who will do the work. The work force in Southwestern Bell is

made up of employees with varying levels of experience and time on the job. Time estimates should be reflective of that variance and are targeted for an average work time.

13. Based on my work experience and management of technical forces, I feel confident that the work I provided is accurate and reflects the time required to perform the functions studied.

Further, affiant sayeth not.

Mike Michalczyk

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

Subscribed and sworn to before me this 17 day of August, 1998.

Notary Public

NOTARY PUBLIC
ST. LOUIS CITY
MY COMMISSION EXPIRES JULY 23 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	)	Case No. TO-98-115

AFFIDAVIT OF JAMES A. HEARST

I, James A. Hearst, of lawful age, being duly sworn, depose and state:

1. My name is James A. Hearst. I am presently Director - Planning and Engineering for Southwestern Bell Telephone, Inc. My qualifications and work history are included (Hearst) Schedule 1, attached to this affidavit.

LOOP CROSS-CONNECTIONS

2. This affidavit contains a description of the various cross-connect arrangements that SWBT has offered the CLECs. It includes a discussion of the need for test access on unbundled loops. SWBT could provide a cross-connect that does not test access, but it would not be providing the same level of service that SWBT provides its end user customers.

3. AT&T claims that cross-connects are a functionality of interconnection and that no separate element is required. The AAS Report assumes that testing will not be included with the loop and cross connect.

SWBT believes that since there are a number of different types of cross-connects required, and they have significantly different costs, there should be a set of separate cross connect elements.

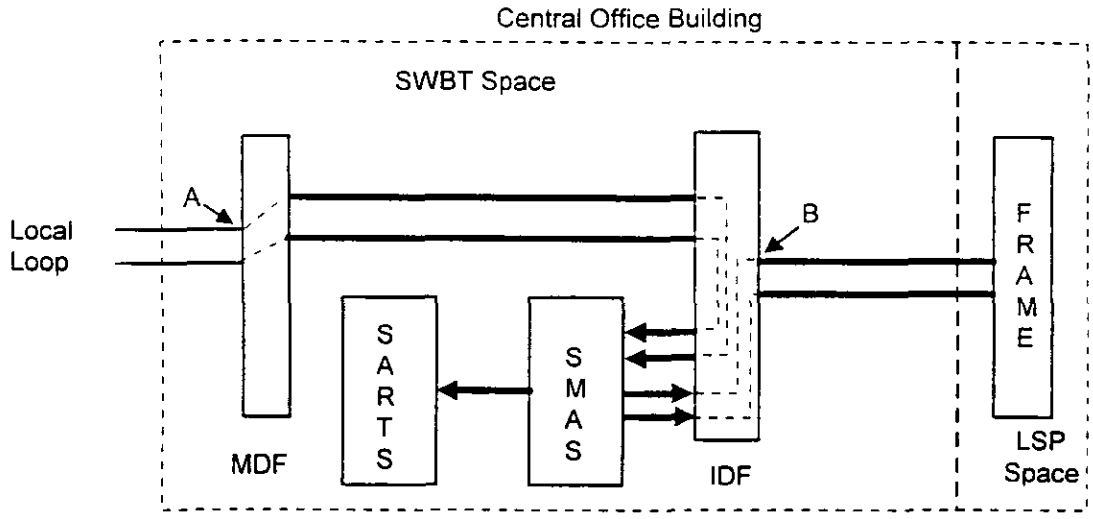
4. SWBT defines a cross connect as follows:

> "Cross Connection" means a connection provided pursuant to Collocation at the Digital Signal Cross Connect, Main Distribution Frame or other suitable frame or panel between (i) the Collocating Party's equipment and (ii) the equipment or facilities of the Housing Party.

In this case the CLEC is the "Collocating Party" and SWBT is the "Housing Party." In the real world, cross connections are wires or fibers that connect one piece of equipment to another on a semi-permanent basis. For instance, a copper local loop may be cross connected at the MDF to a switch port of the central office switch by a simple pair of copper wires called a jumper.

Different loop options require different types of cross connections. In fact, several cross connections may be required for many of the options.

The 2-wire analog and digital loops require the simplest cross connections. If a single pair of copper wires are to be connected to a CLEC's collocation equipment, it will be necessary to cross connect the local loop to a set of test access points and then to a tie cable connecting to the CLEC collocation equipment. The following diagram shows this arrangement.



SMAS = Switched Maintenance Access System
SARTS = Switched Access Remote Testing System
MDF = Main Distribution Frame
IDF = Intermediate Distribution Frame

Figure 1

The analog local loop is terminated on the Main Distribution Frame (MDF). A cable connects the Main Distribution Frame to an Intermediate Distribution Frame (IDF) where the Switched Maintenance Access System (SMAS) test access points are also terminated. A series of two wire jumpers, consisting of pairs of copper wires are placed to connect the local loop on the MDF to the Intermediate Distribution Frame then to the input SMAS test points located on the IDF. A final jumper connects the SMAS output test points on the IDF to a pair of the copper cable that terminates on the frame in the Local Service Provider collocation area. These individual jumpers are shown as dotted lines in Figure 1.

5. The purpose of the SMAS test points is to allow SWBT, when SWBT provides service over a local loop, the ability to perform automatic mechanized testing of the loop through the central office switch. In an unbundled arrangement, it is necessary

to provide test access points by using the SMAS test points. The SMAS test points allow a SWBT test system (SARTS) to access the loop, separate the loop and the connection to the collocation equipment, and perform transmission test from a remote location, just as is done on loops that serve SWBT customers. This testing access is necessary for SWBT to be able to provide comparable levels of maintenance and repair services on loops serving the CLEC's customers to the levels that SWBT achieves on loops serving its own customers.

6. A 4-wire digital loop cross connect is performed in the following manner: digital circuits are terminated on a DSX after being demultiplexed. A special shielded multi-pair wire is used as a cross connection jumper to a cable between the SWBT DSX and the CLEC collocation area. Figure 2 illustrates this arrangement.

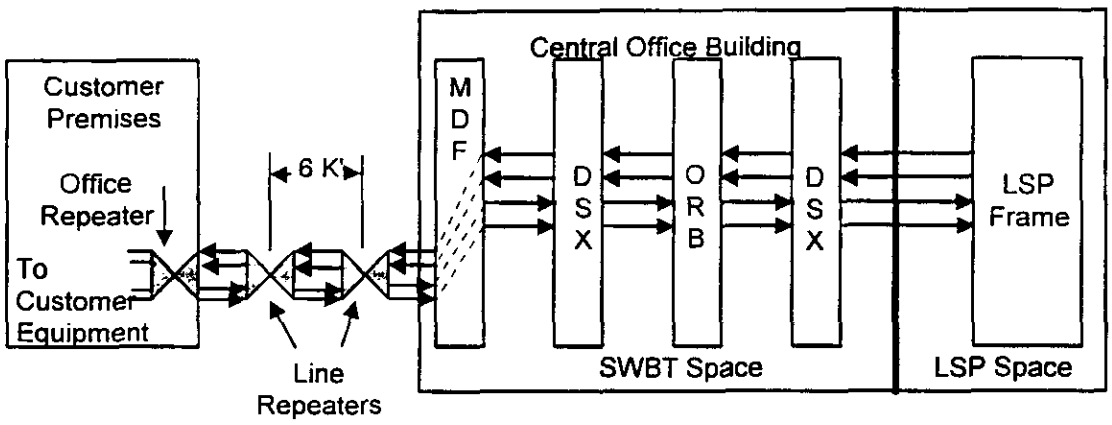


Figure 2

James Hearst

STATE OF TEXAS)
)
CITY OF BELLAIRE)

Subscribed and sworn to before me on this 19th day of August 1998.

Notary Public

P. J. SCHLOEMER
NOTARY PUBLIC, STATE OF TEXAS
MY COMMISSION EXPIRES
FEB. 17, 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	))))))	Case No. TO-98-115

AFFIDAVIT OF MERRI LYNN OWENS

I, Merri Lynn Owens, of lawful age, being duly sworn, depose and state:

1. My name is Merri Lynn Owens. I am presently Manager-Recent Change Memory Administration Center (RCMAC) Methods and Procedures for Southwestern Bell Telephone Company ("SWBT"). My business address is 530 McCullough, Room 3-LL-03, San Antonio, Texas.

2. My primary responsibility is technical support to the RCMAC field supervisors on issues relating to the functions of an RCMAC group. I develop Methods and Procedures for new service or feature offerings. I develop time estimates, as requested by the Cost Study organization, for new or existing services or features.

3. I began my career with Ohio Bell Telephone Company in 1970 as a long distance operator. I moved on to clerical jobs in Network Administration doing Line and Number assigning, data collection and posting and switch translations. I moved to an Engineering Group in 1978 where I continued doing switch translations. In 1980, I transferred to Southwestern Bell Telephone Company in San Antonio, Texas, as a Senior Reports Clerk with Network Design doing data posting and analysis. I moved to Piscataway, New Jersey in 1985 and worked at Bellcore in several capacities, one as a clerical assistant in the Regulatory group and later as Manager in the TNDS group working as PC/LAN administrator. I returned to Southwestern Bell Telephone in 1987 as a Manager-Translations, in Dallas, Texas. March, 1992, I moved to Austin as Manager-RCMAC, Network Operations. In July, 1993, I moved to the SCC as Manager-Network Maintenance; later moving to a central office environment with the same title. I

moved to San Antonio in my current position in July, 1998. I understand that the Arbitration Advisory Staff filed a Costing and Pricing Report, Volume 2 on July 24, 1998. The Report recommends cutting Southwestern Bell's nonrecurring rates in half based upon the AAS opinion that Southwestern Bell does not have sufficient evidence to demonstrate the labor required to perform nonrecurring activities. The purpose of my affidavit is to substantiate the time estimates used in the cost studies by explaining the process used to develop the time estimates used in the cost studies.

4. At the request of the Cost Studies Organization, the RCMAC work groups provided input for cost studies relating to the time and activities for UNE provisioning. These work groups developed the time estimate packages for the translation activity for UNE provisioning using the DMS-100 and 5ESS switch technologies which are the primary switch technologies utilized in SWBT's network.

5. The time estimates were based upon SME experience in supervising local personnel in the RCMAC and many hours observing translations activity. The Line Translations Specialists, who provided input had an average time in title in the RCMAC of 15 years.

6. The time estimates were developed on an average skill level of the employee performing the task. The work force of the RCMAC is comprised of employees with varying levels of experience and time on the job. The time estimates reflect an average work time for the mix of expertise.

7. The time estimates provided are for the Line Translations Specialists (LTS) within the RCMAC. Line Translation Specialists monitor the flow-through of service orders. If an order falls out or rejects, the LTS types the order manually into the MARCH database via keyboard inputs.

8. Southwestern Bell uses the MARCH database to create and input translations into the switches. UNE orders use this same operational system. If an order fails to process through MARCH, an LTS manually edits or types the order so that it will process through the switch.

9. The time estimates reflect the MARCH mechanized system process.

10. I am confident that the work provided is accurate and reflects the true time required to do translations work based on experience in the RCMAC as both a Supervisor and Staff Support Manager.

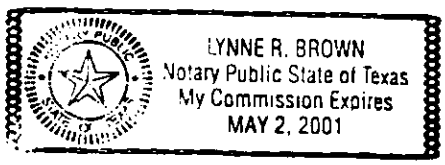
11. I have reviewed the national average times that AT&T provided in the AT&T Non-Recurring Cost model. Based upon my experience, I conclude that those do not reflect expected activity in Missouri or elsewhere in the SWBT operating areas. The time estimates that were provided by the Southwestern Bell managers are reflective of the true times.

Further, affiant sayeth not.

Merri Lynn Owens

STATE OF TEXAS)
)SS
CITY OF SAN ANTONIO)

Subscribed and sworn to before me this 20th day of August, 1998.



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	))))))	Case No. TO-98-115

AFFIDAVIT OF JAMES C. WHITE

I, James C. White, of lawful age, being duly sworn, depose and state:

1. My name is James C. White. I am presently Area Manager Special Services Testing for Southwestern Bell Telephone Company ("SWBT"). My business address is 530 McCullough, 3-L-5, San Antonio, Texas 78215.

2. My responsibilities include network operations testing support of designed services for installation and maintenance (I/M). I provide support to center operations through clarification, modification and training of existing methods and procedures as well as introduction of new methods and procedures.

I participate on product teams, identifying network I/M operational testing needs (requirements, OSS integration, functionality, costs, objectives, time frames, etc.), provide data required for business case creation, and negotiate with test-head vendors for network OSS compatible equipment. I prepare operational test plans, assist with testing in lab and field environments, identify network operational flows, prepare operational procedures for test center forces and assist central office forces with testing of new products and services.

I also work to reduce our testing time which includes the activities such as measuring receipt and analysis of service order and repair work requests times, the time to establish cross connect terminations and placement of plug-ins (electronic circuit cards) in our central offices. Test center technicians interface with our network and our operating support systems (OSS) and perform circuit and equipment turn-up and acceptance testing. They analyze, isolate and repair trouble reports, communicate with and perform end to end testing with customers or their agents when appropriate and technology changes. If there are problems with the established methods and procedures then I work to resolve the problem.

3. I have been an employee of SWBT since 1973 after receiving a BS degree in mathematics. I began my career handling central office frame activities. Thereafter, I moved to outside Plant responsibilities and performed many varied I/M activities. I have a broad background in network operations, with multi-level management experience in both line and staff positions. My experience includes management of forces responsible for designed and non-designed services associated with cable repair, maintenance center operations (local, special and toll), frame control center, switching machines, pair gain and loop electronics equipment, fiber optics, high capacity services, data, PBX, key systems, and CPE. In my current position, I work to lessen service installation and maintenance times for our special service center in five states. Our overall performance clearance times for DS1 and DS0 service is best of all the other RBOCs according to the FCC for the last three years.

Throughout my career, I have attended technical and administrative training courses to maintain current knowledge of leading edge technology. I am considered a Subject Matter Expert (SME) for network operations.

4. I assisted in the gathering of data for designed and non-designed services that was used in Kansas, Arkansas, Missouri, Oklahoma and Texas to develop nonrecurring cost studies for Special Access Services.

5. The cost studies organization requested assistance in verifying previously collected time estimates for a nonrecurring UNE cost study. The data request was distributed to test center and central office representatives from our different market areas to complete and return.

6. The managers that received the data request each had various years of experience with SWBT within network operations. Their backgrounds covered many areas of network operations, but all having experience with designed network operations. The supervisors that completed the data requests all had direct responsibility for the types of services being studied.

7. I have participated in similar cost studies from a staff position since 1990. I have also participated in similar cost studies as a field manager on four other occasions. I have done time and motion studies with a stop watch in tracking times on test center and central office personnel in Kansas, Arkansas, Texas and Missouri.

8. Cost study personnel requested time estimates for specific UNE facility types and services, specifically those on the "sub-task lists". The data necessary for the study was formatted, and forwarded to my group, which made a request to have the test center and central office technical forces with the appropriate base knowledge, complete and return the provided data forms.

9. The time estimates are developed to be reflective of an "average skill level" of the technicians who will do the work. The work force in Southwestern Bell is made up of employees with varying levels of experience and time on the job. Time estimates are reflective of that variance and are targeted for an average work time.

10. Testing on the part of the ILEC is required to properly install services consistently and provide a consistent degree of test quality for the services we provide. This is necessary because certain services interfere with other services and the ILEC needs to monitor interferers and define/know what services are put on what pairs, unless complete cable counts are given to CLEC and they manage specific guidelines.

11. I have reviewed the times provided by AT&T in its non-recurring cost model and do not agree with its claim concerning national averages which, based on my personal experience, are exceptionally low. I have reviewed those times and conclude based on my experience that they do not reflect expected activity in Missouri or anywhere in the SWBT operating areas.

A. For example, AT&T model times do not take in full consideration of the total time to complete a order. The required acceptance time to test an DS1 service according to Bellcore and the National Operational Forum (NOF) is 31 minutes of testing for B8ZS (see Attachment 1), but the AT&T model only shows 5 minutes. The assumption by AT&T that we would have four or more activities at a location each time per trip is invalid since we must comply with short provisioning intervals and shorter maintenance times to service our customers. We travel to many locations to provide timely service while performing only one activity. Step #69 of AT&T's Non-Recurring Cost Model reflects that a technician's travel time to a customer's premise is 20 minutes. I have personally traveled with numerous technicians and this is quite low even for city standards. The average time to travel between work activities is 45 minutes. We do have some work activities that require us to travel two (2) hours or more to perform a work activity.

B. According to the AT&T Non-Recurring Cost Model step #147, it is stated that a DDS test is performed in 15 minutes. The industry standard requirements tests takes 17 minutes to perform. The actual time reflected in the cost study is 12 minutes and 18 seconds, which is lower than the industry standard requirement time and AT&T's cost projection. This came about due to this service lending itself to increase plug improvements, reduced equipment options and production testing of DDS services. All services will not lend themselves to this type of improvements due to movement of the services and technological limitation associated with costs. We do try to find service improvements and cost efficient ways to reduce our testing and installation costs where practical.

C. According to AT&T's Non Recurring Cost Model step #'s 164, 165, and 166, it states it takes ten (10) minutes to provision a DS3 circuit. This is well short of the 160 minutes that is the actual time required for the turn up of a DS3 service. The complexity of the service requires SWBT to do the following:

* Office Wiring	15 min.
* Fiber Optic Terminal	60 min.
* Plug in placement	
* Option verification (setting)	
* Alarm Testing for Maintenance assistance	
* Cross – Office Testing	30 min.
* DS3 Acceptance Testing (Described Below)	40 min.
* Circuit Order Processing	15 min.

D. According to AT&T's Non-Recurring Cost Model step #172, it states that a DS3 test be performed in five (5) minutes. The industry standard requirement is a

Quasi Random signal test of no less than forty (40) minutes and must meet acceptance limits. If the test limit is exceeded then a second forty (40) minute test is run. If the circuit still does not meet the requirements. the circuit must be repaired and the acceptance test is then repeated.

E. It is true that sometimes a technician may be able to work on additional circuits during the wait time for some tests to complete but this is already accounted for in the time estimates. With circuits that have dribbling errors or random errors, the technicians are normally working with other central office and/or field technicians repeating isolation tests. This allows the technician to narrow the points of failure(s) and make adjustments to equipment; this does not afford them time to work on other circuits before going to the next circuit to test. AT&T's non-recurring averages as they apply to Southwestern Bell Telephone Company are thus incomplete and inaccurate.

12. The guidelines used for time estimates are derived from standards by Bellcore, National Operations Forum and local field timed averages. These are applied uniformly throughout Southwestern Bell Telephone Company's five state territory. When SWBT does gather cost data, it defines the work activity by functions and delivers requests to each state in SWBT.

The cost data from each state is looked at for completeness, reasonableness and any gleaming differences from state to state. If differences are significant, we go back and question the process and examine how the functions and time test were done. If re-tests are needed, we get them done. After getting comparable data, it is then averaged and used company wide. The recommended way of performing time estimates is observer-timed, production monitoring and utilizing work samples.

13. Supervisors are chosen to do the estimating because they have a number of technicians reporting to them that are trained to do the installation, testing and maintenance activities associated with this study daily. The supervisors know if some technicians are farther along in their training development than others and how to gather an average time estimate based on the personnel they manage. Most of the managers have physically done or can do the job their technicians are doing. They gain the skills from doing the job before they were promoted. Also many were trained in formal school and further picked up a clear understanding of the activities by working with their people on work reviews, time reviews and job appraisals.

14. Central office locations to which we have to travel could have an order with five or more activities at times, but normally branch site activities involving only one or two in order to manage due date appointments. The activities that would be performed include service order wiring, equipment installation and office routines.

Further, affiant sayeth not.

James White

STATE OF CALIFORNIA)
)SS
CITY OF Contra Costa)

Subscribed and sworn to before me this 20 day of August, 1998.

Notary Public

My commission expires:

8/5/01

CATE HOLLEY LEVINE
Comm. # 1150152
NOTARY PUBLIC - CALIFORNIA
Contra Costa County
My Comm. Expires Aug. 5, 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	))))))	Case No. TO-98-115

AFFIDAVIT OF RANDAL P. VEST

I, Randal P. Vest, being of lawful age, being duly sworn, depose and state:

1. My name is Randal P. Vest. I am presently Director-Telecom Management Technology. I am employed by SBC Technology Resources, Inc. at 9505 Arboretum Boulevard, Austin, Texas 78746.

2. I am a native of Little Rock, Arkansas. I graduated in 1973 from the University of Arkansas at Fayetteville with a Bachelor of Science degree in Electrical Engineering. After a summer internship with Southwestern Bell in 1972, I began full time employment in 1973, and now have twenty-five (25) years service with the company. I first worked as a switching engineer in Little Rock and subsequently held positions as a transmission engineer and inventory manager before moving to the SWBT St. Louis staff in 1978. In St. Louis my initial assignment was management of an operational support system for inventory control. Subsequently, I was promoted to supervise a group of operational support system experts who managed systems which inventory and assign special services. This is the position I held during divestiture when many of the operational support systems had to be extensively altered for revised operations. I have experience with a variety of provisioning systems such as TIRKS,

LFACS and SWITCH. After divestiture, I was assigned a primary planning role for the complete portfolio of SWBT operational support systems. I served this function for eleven (11) years from 1986 until last September, when I moved to Austin for a job with Technology Resources, Inc., the research and development subsidiary of SBC.

3. My position at TRI is supervisor of a group of computing experts who provide expertise to all of SBC operations. I have taken numerous courses both internal and external to the company on technology and support systems. In addition, I have had extensive experience with SBC's international operations, offering expertise to ventures in England, France, Mexico and other locations.

4. The purpose of my affidavit is to explain the efficiencies achieved by SWBT through the application of Operational Support Systems and the fall out SWBT experiences.

5. The service provisioning processes center around Operational Support Systems. There are actually many different flows dependent on the type of service and customer needs being addressed. I would equate these to assembly lines where different stations exist to perform specific functions. Each different process flow or assembly line may share certain stations with another process, but also may require its own unique functions. The functions to provision an ISDN service are not exactly the same as those necessary to provision a Frame Relay service. It is common to group several process flows into a category based on some common function or characteristic of the processes. As an example, two common categories of these assembly line flows would be Retail and

Wholesale. This categorization recognizes there are distinct requirements between functions for Retail versus Wholesale services.

6. There is a strong emphasis on eliminating the manual effort for every function where it is reasonable and cost efficient to do so. The term "flow-thru" is often used to reflect this objective. A function with 90 (ninety) percent "flow-thru" would require 10 (ten) percent of service activity volume to receive manual assistance to complete the function. There is also a concept of end-to-end "flow-thru", reflecting how well the service is mechanically completed by all the stations in a type of flow.

7. The Retail Provisioning processes generally include the following functions:

- Customer Contact - The retail customer calls a service center. The SWBT service representative is supported by a system named EASE. This system allows the representative to capture the customer request in simple terms, to automatically retrieve service history, to verify address information, and to perform a number of other tasks mechanically. EASE was developed as a retail order support system.
- Service Identification Assignment - For most residential services, the service identification is a telephone number. The Bellcore system PREMIS performs this function.
- Order Generation - The service data is transformed into a Service Order. The Southwestern Bell Telephone system for service order management is the Southwestern Order Retrieval and Distribution (SORD) system. Many years ago, this Southwestern Bell system was transferred to other Regional Bell Operating

Companies. The acronym may be somewhat common, but the Southwestern Bell SORD product is unique to the Southwestern Bell provisioning process.

- Order Analysis and Control - The SORD system passes the order to a Bellcore developed system, the Service Order Analysis and Control (SOAC) system. As its name implies, this system analyzes the order and packages requests to a number of assignment, data base, and work control systems to assemble the network components necessary to provide the service, as well as to initiate the installation of the assembled components. These functions are:
  - Loop Assignment - Assignment of distribution inventory is through a Bellcore system named LFACS.
  - Switch Port Assignment - The Bellcore SWITCH system is used in Southwestern Bell to inventory and assign switch ports.
  - Equipment Assignment - The Bellcore TIRKS system is used to inventory and assign any equipment components.
  - Facility Assignment - Certain facilities, particularly Interoffice Facilities, are inventoried and assigned out of TIRKS.
  - Service Design - If there are computations required to determine if service parameters are being adequately met, TIRKS is the system involved.
  - Translation Update - The Bellcore developed March system, or other translation based applications such as OPS/INE update software controlled network elements. These software systems receive an advance copy of the request from SOAC and await installation of any physical components.

- Work Control - The Bellcore WFA Control system serves to coordinate the various work steps required to establish service.
- Dispatch - Outside installation activities are under the control of the WFA Dispatch Outside system.
- Inside Work Control - The inside wiring required for the service may be directed through either the Frame Order Management System, or WFA Dispatch Inside system.

- Completion - After all assignment and installation activities have been coordinated, the SOAC system completes the order to SORD. Then SORD controls the necessary data base and system updates to reflect a completed service.
- Billing - SORD triggers an update of the billing process through the CRIS system. Like SORD, several RBOCs have billing systems with this acronym, but this system is unique to Southwestern Bell.
- Ongoing Service Update - A number of records such as calling cards, E911, etc. must be updated to reflect the completed service.

8. I have only described a few of the systems which have been developed to facilitate the provisioning process. In Southwestern Bell, over fifty (50) different systems are involved in one or another type of provisioning flow process.

9. Less than half of these systems are common to many different companies. The common systems include those such as TIRKS, SOAC, etc. which I have described in my outline of the provisioning flow process.

10. SWBT has been a leader among the RBOCs in many areas of commonly used support system definition and development. For example, the major new system added during the past seven years has been the SWITCH system which provides for the complex function of inventorying and assigning switch ports. SWBT was the lead RBOC in this deployment, receiving new computer updates prior to any other company and directing the vendor development process. SWBT was the first RBOC to completely replace its COSMOS computers with this advanced product.

11. Several such systems were mentioned in my description of the provisioning process, including EASE, SORD, and CRIS, which were developed specifically for use by SWBT. SWBT is very adept at internal system development when commercial products are not available to meet business needs.

12. There is much discussion related to efficiencies in operations as expressed by flow-thru percentages. As I have described, the complete provisioning process can be compared to an assembly line of many functions. A composite fallout rate of 2 (two) percent would imply only fractional fallout rates in each of the many functions within the assembly line. While SWBT has been extremely successful in reducing costs by achieving flow-thru in different functions, achieving fractional fallout is highly unlikely due to their complexity and the presence of even the most minimal human errors. As I have testified, SWBT has many systems and processes unique to SWBT, and through these we have achieved efficiencies comparable to any in the industry.

13. There are limitations to SWBT's application of technologies related to provisioning. We certainly are always conscious of being cost effective. We have a

rigorous process of analysis for the application of new systems and technologies. And since the most cost effective manner to obtain much of our systems needs are from third party vendors, the acceptance and application of new technologies to their product lines is a factor. For example, in other cases or in the media, there is suggested use of the technology of Global Positioning for dynamic technician dispatching. This is a very expensive technology which is not currently applied to dynamic dispatching in our third party vendor's dispatch system. We are working closely with our vendor to determine the best and most cost effective manner to utilize this technology.

14. In my experience Staff's proposed fallout rate of five (5) percent is unreasonable. A cumulative fallout rate of only 5 (five) percent for all of the provisioning steps of a typical process would be difficult to justify economically. Some very complex steps are required for some services, and these are automatically dropped (counted as fallout) and the step is completed manually. SWBT has a continual emphasis on programming updates to reduce this manual intervention, but this is performed only when the benefits justify the additional mechanization costs. Fictitious estimates of fallout rates should be avoided in favor on measured results.

Further , affiant sayeth not.

Randal P. Vest

STATE OF TEXAS)
) SS
COUNTY OF TRAVIS)

Subscribed and sworn to before me this 20th day of August, 1998.

MARILYN SIMPSON
Notary Public, State of Texas
My Commission Expires
OCT. 27, 2001

Notary Public

My commission expires:

_____

BEFORE THE PUBLIC SERVICE COMMISSSION

OF THE STATE OF MISSOURI

In the matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252 (b) of the Telecommunications Act of 1996 to establish an Interconnection Agreement with Southwestern Bell Telephone Company	)))))))	Case No. TO-98-115

AFFIDAVIT OF BARRY A. MOORE

I, Barry A. Moore, of lawful age, being duly sworn, depose and state:

1. My name is Barry A. Moore. I am presently Area Manager-Product Cost Development and Analysis for SBC Telecommunications, Inc. My qualifications and work history are included in (Moore) Schedule 1, attached to this affidavit.

COMMENTS REGARDING AAS COST RECOMMENDATIONS

2. The AAS Costing and Pricing Report, Volume 2, indicates that "...Staff requested SWBT rerun its cost studies with Staff's recommendations." Although Staff did request that several studies be examined to determine the impact of its recommendations, Staff did not make a formal request regarding the rerun of SWBT cost studies. Staff agreed with SWBT that rerunning cost studies would not be appropriate until after the Commission had issued its decision. SWBT did provide Staff with an informal cost estimate incorporating Staff's recommendations for the following cost studies:

Cross-connects

- 4-Wire DS1 Loop Cross-connect to Multiplexer

UNE Dedicated Transport

- Entrance Facilities
- DS1 Cross-connect
- Digital Cross-connect System
- Multiplexing

Dark Fiber

- Dark Fiber Cross-connect

3. In response to the costing recommendations proposed by Staff in this proceeding, I have examined those areas specific to Cross-connects, Unbundled Dedicated Transport, and Dark Fiber. I will comment on those specific recommendations, excluding any discussions on Staff's proposed "global modifications"[1] relating to cost factors and common costs.

4. Staff recommends only that "global modifications" be made to DCS and Switch Port Cross-Connects, 4-Wire DS1 Loop Cross-connect to Multiplexer, and CLEC to SS7 STP Cross-Connects. Staff's "global modifications" include, as stated, "any other applicable modifications Staff recommended in TO-97-40/67 that apply to the cost studies in dispute in this arbitration." SWBT does not believe it is appropriate to make modifications to these studies without determining whether the modifications are appropriate. The Commission has not made any determination that modifications

[1] By "global modifications", SWBT understands that Staff proposed to make designated changes to all of SWBT's cost studies. Some of those designated changes were previously recommended by Staff in TO-97-40, et al.

proposed by Staff are to be made automatically to these cost studies. It is SWBT's position that the global revisions are not appropriate for the DCS, Switch Port, 4-Wire DS1 Loop to Multiplexer, and SS7 cross-connects.

5. The estimations to the cross-connect studies based upon earlier Staff recommendations made in May and referenced in number 2 above are no longer valid because Staff's previous recommendations differ from those now supported by Staff.

Staff's May recommendations sought to extend the TO-97-40/67 Staff recommendations to these cross-connects. That proposal would require the development of cross-connect costs on a with and without testing basis. The proposal would have applied to all cross-connects filed in this proceeding, and would have effected a change in the 4-Wire DS1 Loop Cross-Connect to Multiplexer; other elements would have been affected but only due to cost factor modifications. In the second round of arbitration SWBT objected to the development of cross-connect prices without testing capabilities. As Mr. Hearst has indicated in his affidavit, SWBT must provide for the testing of unbundled elements in order to maintain the same quality of service for wholesale (UNE) customers as it provides to its own customers. SWBT will require testing equipment on its facilities and the exclusion of such equipment will result in prices for such elements that are not compensatory. In addition, during the second round, SWBT agreed with Staff that the Intermediate Distribution Frame (IDF) to Multiplexer issues had been brought to closure in the earlier, first round.

6. Staff concludes that "there are costs for entrance facilities." It also concludes that "Cost studies for entrance facilities were included in the Dedicated

transport cost studies SWBT submitted." SWBT agrees and has conducted cost studies consistent with these conclusions.

7. Staff recommends that earlier LPVST model (SWBT's loop investment model platform) modifications also be made to DS1 and DS3 UNE Entrance Facility costs. Such modifications will include the development of samples specific to DS1 and DS3 (or DS1 as a surrogate for DS3), and the use of average lengths in individual distance bands in lieu of the use of the distance band designation. SWBT agrees with these recommendations.

8. Regarding OC-X entrance facilities, Staff recommends pricing these elements on an ICB basis. SWBT agrees with Staff on this issue and offers no further comments.

9. Staff recommends that SWBT alter its dedicated transport cost studies with all of the global modifications described in TO-97-40/67. Staff also recommends that SWBT separate the costs associated with DCS access and with multiplexing in its costs for dedicated transport cost study (for speeds that differ from when the traffic is picked up or dropped off). SWBT agrees that the costs for DCS access and multiplexing are separate from dedicated transport and have previously provided stand alone cost studies for DCS access and multiplexing.

10. Regarding DCS and multiplexing, Staff also recommends that SWBT provide separate costs for these components of Dedicated Transport costs so that the CLEC could get on or off of the network at differing speeds than the transport speed being utilized. SWBT agrees with Staff on this issue and those studies currently are arranged in the manner recommended.

Barry A. Moore

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

Subscribed and sworn to before me on this 24th day of August 1998.

Maryann Purcell
Notary Public

MARYANN PURCELL
Notary Public - Notary Seal
STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP JAN 5,2000

SUMMARY OF EDUCATION AND WORK EXPERIENCE OF

Educational Background

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. In 1982, I received a Bachelor of Science Degree in Mechanical Engineering from the University of Missouri in Columbia, Missouri. In 1993, I received a Masters Degree in Business Administration from Lindenwood College in St. Charles, Missouri. In addition to my formal education, I have also attended a number of seminars and various courses relating to cost analysis and other related areas.

Work Experience

Q. PLEASE OUTLINE YOUR WORK EXPERIENCE WITH SOUTHWESTERN BELL TELEPHONE COMPANY.

A. I was employed by Southwestern Bell in 1979 as an installation technician in St. Louis, MO. In 1982, I accepted the position of Construction Supervisor and was responsible for supervising the construction of telephone plant in the Metropolitan St. Louis area. In the mid-1980s, I was responsible for supervising the maintenance of telephone cables. In 1986, I accepted the position of Manager-Cost Analysis and was responsible for conducting cost studies for various retail services provided by Southwestern Bell Telephone Company. From 1988 to present, I have carried the equivalent title of Area Manager-Product Cost Development and Analysis.

I am currently responsible for the development and review of cost studies for services and elements provided and anticipated by Southwestern Bell Telephone Company. During my tenure at SWBT, I have been involved with the development of numerous cost studies involving SWBT's various network

components. Based upon both my field and cost experience. I am fully aware of the cost characteristics of SWBT's facility components.

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BEFORE THE PUBLIC SERVICE COMMISSION
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AFFIDAVIT OF SHARON S. SADLON

1. My name is Sharon S. Sadlon. I am presently Area Manager - Translations for Southwestern Bell Telephone Company ("SWBT"). My business address is 530 McCullough, 3-FF-06, San Antonio, Texas.

2. My primary responsibility is to develop and test methods and procedures for new service or feature deployment in the NORTEL family of switches, commonly known as DMS100. DMS100 includes end office, access tandem and TOPS applications. I also provide technical support to other staff employees on issues relating to NORTEL switches. I support local network operations organizations with activation and maintenance of switch based translations. I develop time estimate packages, as requested by the Cost Study organization, for switch based services and features deployed on the NORTEL family of switches. I also participate as SWBT's representative on a national forum of translation Subject Matter Experts funded by all the Regional Bell Operating Companies (RBOC), through Bellcore, on the NORTEL switches.

3. I have been an employee of Southwestern Bell Telephone Company since 1974. I began as an operator and moved into the business office as a Service Order Writer (a clerical

position) in 1975. In 1978, I applied for the job of Switching Technician, now Communications Technician. After passing the required tests, I moved into that position in December 1978. Initially, I worked in the central office environment on the 1E/1AESS switches. I moved on to the Switching Control Center (SCC) and worked through the job functions of the SCC. I built and maintained trunk groups, analyzed trouble reports, monitored office performance, and eventually moved into inputting and maintaining central office translations.

In 1989, the NORTEL switches were added to the network environment where I worked. I assumed responsibility of developing, inputting, testing and maintaining translations in the NORTEL switches in the St. Louis market area until 1993 when I was promoted to management. This is my current position and I now work exclusively with the NORTEL family of switches. Throughout my time as a Communications Technician and in the current management position, I have attended various training courses specific to the maintenance and support of the switching network. I am considered a Subject Matter Expert (SME) for NORTEL switches.

4. I am providing this affidavit to explain the process I used to develop time estimates which are used in developing cost studies. I understand that a recommendation for cutting Southwestern Bell's nonrecurring rates in half was based on the Arbitration Advisory Staff's filed Costing and Pricing Report, Volume 2 of July 24, 1998. The recommendation is based on their opinion that Southwestern Bell does not have sufficient evidence to demonstrate the labor time to perform nonrecurring activities.

5. I provided the time estimate packages for preparation and implementation of switch based translations. This information was used by cost study personnel to prepare the studies under review in this docket. I have been in my current position since August 1993. Any cost study request that requires time estimates for translation work on a NORTEL switch comes to me. I have provided more than 100 time estimate packages since 1993.

6. In order to perform switch based translations, software definitions must be programmed into the switch to establish basic classes of service, code definitions (NPA-NXX), call routing, call charging and features. For example, routing and charging translations are table entries which cause call processing in the central office (switch) to determine the correct steps to deliver the originating end user's call to the desired destination and to create appropriate records for billing. These translations are needed for each and every SWBT retail and CLEC unbundled or resold service.

7. The time estimates I provided involve work done in the translation administration work groups, known as the TXC. In most cases, the work is prepared, reviewed, and implemented by Communication Technicians. In some cases preparation is done by Translations Clerks, who are trained to datafill the translation forms of the specific switch technologies. The Communications Technician is a more highly skilled job. These employees develop the complete translation packages; from completing forms, developing the required recent change messages, and analyzing and/or correcting any errors encountered once the data is released to the central office. Forms prepared by Translations Clerks must be reviewed by a Communications Technician for accuracy before release to the switch. Review is necessary to prevent possible loss of service due to errors in switch-wide translations. The

time estimates I prepared reflect an average of the work done by the personnel in the two jobs. I used various vendor documents developed by design personnel and the knowledge I gained through 19 years of experience to establish the time estimate packages used in this case.

8. My participation in Product Teams where development and deployment of the service is determined, also provided me a common understanding of the work involved in time estimates. A Product Team which is made up of representatives from network, billing, marketing, service order methods and any other department needed to provide the service is used for both SWBT retail and UNE services.

9. Additionally, internal Southwestern Bell documents such as Marketing and Technical Service descriptions, produced by Product Managers or Technology Planners were used to develop the company-specific translations requirements.

10. I use the lab environment to implement new translations and validate my time estimates.

11. The time estimates are developed to be reflective of an "average skill level" of the employees who will do the work. The work force in Southwestern Bell is made up of employees with varying levels of experience and time on the job. Time estimates should be reflective of that variance and are targeted for an average work time. Neither the highest nor lowest skill level would be appropriate as the work effort required to prepare and implement translations. My skill level is required to research and develop the time estimates.

12. Southwestern Bell utilizes two systems, Mechanized Translation System (MTS) and Automated Processing Recent Input Letters (APRIL), working together to create and

input translations in the switches. Unbundled Network Element (UNE) orders will pass through these same operations support systems. The use of mechanization was considered when time estimates were developed. Within the last year I requested a review by the TXC field managers of the current time template developed for NORTEL translation tables to make sure it was still valid in light of mechanization activities. Comments and recommendations from them have been incorporated in the template. The field managers have experience and skill level similar to mine and have the added benefit of being in the working environment day to day.

13. The mechanized system, MTS, is not used on all translations. MTS was developed for the high runner (a frequently requested service) or most common translation forms. It does not support every translation type required for any switch. Each vendor product has translation procedures which require sequenced input or development that prevents mechanization from being effective or network secure. Additionally, new development by the vendors create ongoing requirements of manual input.

14. Since MTS does not interface any operation support system, manual creation of MTS packets is required. Communications Technicians, and in some cases Central Office Translation Specialists, receive Translations Questionnaires (TQs), Access Service Requests (ASRs), Code Activation Notifications (CANs), Design Orders or other switch translation requirements which are used to manually develop packets in MTS.

15. The work I do is in support of approximately 170 DMS switches, the number fluctuates with the growth and change of the network.

16. The translation work on these switches is prepared when a new service or feature is ordered in the central office for switch wide deployment or just one customer. For example, if a Competitive Local Exchange Carrier (CLEC) requests an unbundled line class code (LCC) in a central office, a Class Of Service Transmittal (COST) is prepared based on the CLEC's request and placed on the INTRANET of Southwestern Bell. A notice is sent to the TXC of the COST document via e-mail. The appropriate Communications Technician, or Translations Clerk, will be notified by the TXC manager to prepare the switch specific translation forms in MTS required for the LCC. MTS will create the recent change messages required.

The Communications Technician will then review the messages for content and sequence of implementation. Once this is complete, with any corrections or manual intervention required, the Communications Technician will release the packet to the switch via APRIL. Following successful completion of the packet, the translations are verified in the switch and the packet is completed in MTS. If MTS is not available for the specified switch or the translation forms required are not available from MTS, the Communications Technician will have to develop the recent change and use manual input to build the LCC in the switch.

The DMS100 requires several translation tables to be datafilled in sequence to establish a single LCC. The Communications Technician is required to monitor the release of the MTS packet to maintain the sequencing and insure correct completion of the order.

17. The validity and accuracy of the time estimates I provide is based on actual work experience and technical ability developed over many years. I continue to practice my skills

in the lab environment and interact with the field work force day to day as a support person. I strive to maintain my expertise through continued training and development of translation methods and procedures.

I maintain a database of time estimates using a template of the times required to populate the various tables of the NORTEL family of switches. When a time estimate packet is prepared, the template data becomes part of a workbook created based on the tables and the entries in the tables required to implement the feature or service.

The same time estimates used to price or cost out SWBT's competitive retail services were provided to support the pricing of UNEs.

Further, affiant sayeth not.

Sharon S. Sadlon

Sharon S. Sadlon

State of Texas }
}SS
City of San Antonio }

Subscribed and sworn to before me this 20th day of August, 1998.

Lynne R. Brown

Notary Public

My appointment expires:

LYNE R. BROWN
Notary Public State of Texas
My Commission Expires
MAY 2, 2001

Attachment A
TRANSLATIONS MODULE DEFINITION WORKSHEET

Activity Type: **Resold LCC customized routing.** **Service: NEW**

Switch Type: **DMS-100 FAMILY** **Date: 8/19/98**

	Preparation Time	Implementation Time
INITIAL	40	34
SUBSEQUENT	83	70
TOTAL	123	104

NOTES: Initial translation of resold service.
Add 50 mins. for testing time 5min per 10 calls

Questions may be referred to: Sharon Sadlon

Telephone: 314-235-6065

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Service Type: Resold LCC customized routing | Date: 8/19/96

Switch Type: DMS-100 FAMILY | Activity: NEW

Form	Command Title	Quantity	TXC COST First	TXC COST Subsequent	SOC COST First	SOC COST Subsequent	TOTAL TXC SUB	TOTAL TXC COST	TOTAL SOC SUB	TOTAL SOC COST
TOTALS							0	0	0	0
aabsfilt							0	0	0	0
aabsost							0	0	0	0
acclab							0	0	0	0
accindex							0	0	0	0
accode							0	0	0	0
accrs							0	0	0	0
acrsab							0	0	0	0
accsam							0	0	0	0
acctroute							0	0	0	0
acdadmin							0	0	0	0
acdenlog							0	0	0	0
acdgrp	Automatic Call Distribution Group		30	30	20	20	0	0	0	0
acdlogin	Automatic Call Distribution Login IDs		10	5	10	2	0	0	0	0
acdmisol	Automatic Call Distribution MISL		15	15	5	5	0	0	0	0
acdmisup	Automatic Call Distribution MISP		15	15	5	5	0	0	0	0
acdrte	Automatic Call Distribution Route		30	30	15	15	0	0	0	0
acdsgrp	Automatic Call Distribution Subgroup		30	30	15	15	0	0	0	0
acdtrkmem	Automatic Call Distribution Trunk Member		10	10	5	5	0	0	0	0
achred							0	0	0	0
aclang			5	2	5	2	0	0	0	0
aclogid							0	0	0	0
acmsg			5	2	5	2	0	0	0	0
acne							0	0	0	0
acscan							0	0	0	0
acscmt							0	0	0	0
actcl							0	0	0	0
actgen							0	0	0	0
actmis							0	0	0	0
actpatch							0	0	0	0
actsig							0	0	0	0
actsnbec							0	0	0	0
actsopts							0	0	0	0
actsrvl							0	0	0	0
adaccopl							0	0	0	0
adjnode	Adjacent Node		15	15	10	10	0	0	0	0
aggravs							0	0	0	0
ainann	AIN Announcement ID to Switch Announcements		5	2	5	2	0	0	0	0
aiodgrp	Automatic Identified Outward Dialing Group		2	2	2	2	0	0	0	0
aiodmem	Automatic Identified Outward Dialing Member		5	2	5	2	0	0	0	0
aiodtkn	Automatic Identified Outward Dialing Token (read only)						0	0	0	0
aiscal							0	0	0	0
akeytab							0	0	0	0
alarmtab							0	0	0	0
almsc							0	0	0	0
almscgrp							0	0	0	0
almsd							0	0	0	0
almsdgrp							0	0	0	0
altsched							0	0	0	0
amagrpid							0	0	0	0
amaopts	AMA Options		5	5	2	2	0	0	0	0
amaserv							0	0	0	0
amatkopt	AMA Trunk Options		5	5	2	2	0	0	0	0
amasked							0	0	0	0
amboxe							0	0	0	0
amhead							0	0	0	0
amrcal							0	0	0	0
amroute							0	0	0	0
amvte							0	0	0	0
anatrs							0	0	0	0
andata							0	0	0	0
annmems	Announcement trunk members				5	2	0	0	0	0
anns	Announcement Group data		10	5	10	10	0	0	0	0
aocdnv							0	0	0	0
apmv							0	0	0	0
areacode							0	0	0	0
arumembr							0	0	0	0
asufix							0	0	0	0
ascs							0	0	0	0
asrtable							0	0	0	0
assvfeat							0	0	0	0
assvlink							0	0	0	0
atmeg							0	0	0	0
atpes							0	0	0	0
atomsmd							0	0	0	0
atrmod							0	0	0	0
attcons	Attendant Console		20	20	12	1	0	0	0	0
attopns							0	0	0	0
attrib							0	0	0	0
attsched							0	0	0	0

Transaction Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type:

Switch Type: DMS-100 Family

Date: 01/2002

Service:

Form	Command Title	Quantity	TSC COST First	TSC COST Subsequent	BCC COST First	BCC COST Subsequent	TOTAL TSC SUB	TOTAL TSC COST	TOTAL BCC SUB	TOTAL BCC COST
TOTALS							0	0	0	0
modpmtrs							0	0	0	0
modsd	Audits		10	10	5	5	0	0	0	0
modgrpm							0	0	0	0
quanclls	Authorized User Costs		5	2	5	2	0	0	0	0
subsyrpt	Authorized User Partition		10	10	5	5	0	0	0	0
subsyms							0	0	0	0
subsyhlb							0	0	0	0
subsyhlb							0	0	0	0
datadpm							0	0	0	0
subsyhlog							0	0	0	0
bcc cables	Bill Codes		5	2	5	2	0	0	0	0
bccompbas							5	5	5	5
bcscpf	Bearer Capability						0	0	0	0
bc surgry							0	0	0	0
bc surhs							0	0	0	0
bcdu rt							5	5	5	5
bgdcrtb							0	0	0	0
bgsdcver							0	0	0	0
bgsdcrt							0	0	0	0
billcalm							0	0	0	0
bkgprtr							0	0	0	0
bnsdcrtr							0	0	0	0
bnsdcver							0	0	0	0
bnsurtb							0	0	0	0
bnsgcrtm							0	0	0	0
bpgcrtwd							0	0	0	0
brsdcbdm							0	0	0	0
brsvcbgt							0	0	0	0
brcdmtb							0	0	0	0
c7ubpc							0	0	0	0
c7ssmb							0	0	0	0
c7sdmbc							0	0	0	0
c7sdmgt							0	0	0	0
c7sdmtpc							0	0	0	0
c7sscmtb							0	0	0	0
c7sdmtpc							0	0	0	0
c7bcrstr							0	0	0	0
c7bpbnt							0	0	0	0
c7cspc							0	0	0	0
c7cgpr							0	0	0	0
c7cngsn	CCS7 Congestion		5	5	5	5	0	0	0	0
c7scdb							0	0	0	0
c7spctbl							0	0	0	0
c7sysbl							0	0	0	0
c7gsdmp							0	0	0	0
c7gsdmt							0	0	0	0
c7gpt							0	0	0	0
c7gpst							0	0	0	0
c7gb	CCS7 Global Title		5	2	5	5	0	0	0	0
c7gbtt							0	0	0	0
c7gtt4s	CCS7 Global Title Type		10	10	10	10	0	0	0	0
c7gtt4s							5	5	5	5
c7ccvmd							0	0	0	0
c7ccvcg							0	0	0	0
c7ilsn	LCCS7 Link		10	10	10	10	0	0	0	0
c7ilcpt	LCCS7 Link Set		10	10	10	10	5	5	5	5
c7lsdmsk							0	0	0	0
c7lsdmt							0	0	0	0
c7lsdbm							0	0	0	0
c7lsdmcm							0	0	0	0
c7lsdmrt	LCCS7 Network		10	3	5	1	0	0	0	0
c7lsdctbl							0	0	0	0
c7lsdmcs							0	0	0	0
c7lsdmtg							0	0	0	0
c7lsvdsr							0	0	0	0
c7lsgrsm							0	0	0	0
c7lsgrvs							0	0	0	0
c7rsdset	LCCS7 Route Set		10	3	10	1	0	0	0	0
c7lsvdr	CCS7 Linkset		5	5	5	5	0	0	0	0
c7lsbufmm							0	0	0	0
c7sgmu							0	0	0	0
callcpt							0	0	0	0
cancelcw							0	0	0	0
cancrcdn							0	0	0	0
capcpmd							5	5	5	5
carrmtc	Carrier Maintenance				5	5	0	0	0	0
carrpt							0	0	0	0
cacrdsv							0	0	0	0
catcybrs							0	0	0	0
ccauthd							0	0	0	0
ccc							0	0	0	0
ccregtbl							0	0	0	0
ccs a							0	0	0	0
ccbst							5	0	5	0
ccsysmtc							0	0	0	0
ccsTrans							0	0	0	0
ccsubsrb							0	0	0	0
ccsdsbc							0	0	0	0
ccs	Call Hdly Cause Routing		5	1	5	1	0	0	0	0
ccsrvd							0	0	0	0
ccsvrfb							0	0	0	0
ccsysmtc							0	0	0	0

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type:

Date: [illegible]

Switch Type: DMS-100 FAMILY

Survey:

Form	Command Title	Quantity	TSC COST First	TSC COST Subsequent	BOC COST First	BOC COST Subsequent	TOTAL TSC SUB	TOTAL TSC COST	TOTAL BOC SUB	TOTAL BOC COST
TOTALS							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Customer Data Change DN		10	10	5	5	0	0	0	0
[illegible]	Customer Data Change LENS						0	0	0	0
[illegible]	Customer Data Change Login		10	10	10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	2	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	[illegible]		5	2	5	[illegible]	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	CCS7 [illegible] Table		5	[illegible]	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Common Language Location Identifier		5	5	5	3	0	0	0	0
[illegible]	Trunk group Maintenance Parameters		5	5	5	5	0	0	0	0
[illegible]	Trunk group Maintenance Parameters		3	3	5	3	0	0	0	0
[illegible]	Class of Service Screen [illegible]		10	10	10	3	0	0	0	0
[illegible]	Class of Service Screen Summary		10	3	5	1	0	0	0	0
[illegible]	List of commands and access privileges				10	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	1	5	1	0	0	0	0
[illegible]			15	15	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]	Start Conference Circuit				10	5	0	0	0	0
[illegible]	Open Conference Circuits				10	5	0	0	0	0
[illegible]	Class of Service Data		15	10	15	10	0	0	0	0
[illegible]	Class of Service Map		15	10	15	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15		15		0	0	0	0
[illegible]			10		15		0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Customer Group Contain options (70 [illegible])		10	5	10	5	0	0	0	0
[illegible]	Customer Group Engineering		5	5	5	5	0	0	0	0
[illegible]	Customer Group Family		5	5	5	5	0	0	0	0
[illegible]	Customer Group Head Table		10	10	10	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]	Customer Group Network		20	5	5	5	0	0	0	0

[illegible]

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Software Type

Product Type DMS-100 FAMILY

Parts	Comment Text	Quantity	TSC COST First	TSC COST Subsequent	BCC COST First	BCC COST Subsequent	TOTAL TSC SUB	TOTAL TSC COST	TOTAL BCC SUB	TOTAL BCC COST
TOTALS							0	0	0	0
[illegible]	Logic Privilege Set Definition				5	2	0	0	0	0
[illegible]	Customer Group SMDR		5		1		0	0	0	0
[illegible]	Customer Group Options		5	2	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Customer Data Change Operations		5	2	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			12	5	12	5	0	0	0	0
[illegible]			10	5	10	5	0	0	0	0
[illegible]			10	5	10	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Logic Connection		15	15	10	11	0	0	0	0
[illegible]	Logic Manipulation		15	10	10	10	0	0	0	0
[illegible]					10	10	0	0	0	0
[illegible]					10	10	0	0	0	0
[illegible]					10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			12	5	3	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]			41	15	30	5	0	0	0	0
[illegible]			48	15	20	5	0	0	0	0
[illegible]			10	5	3	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Data Profile		30	30	15	11	0	0	0	0
[illegible]							0	0	0	0
[illegible]					12	10	0	0	0	0
[illegible]					10	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			12	5	12	4	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0

Transaction Times for the
OMS PRODUCT
All Costs in Minutes

Activity Type

Switch Type: DMS-100 FAMILY

Date: [illegible]

Bulletin

Form	Command Tale	Quantity	TSC COST Fault	TSC COST Subsequent	BCC COST Fault	BCC COST Subsequent	TOTAL TSC Sub	TOTAL TSC COST	TOTAL BCC Sub	TOTAL BCC COST
TOTALS							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			30		45		0	0	0	0
[illegible]			45		30		0	0	0	0
[illegible]			30		30		0	0	0	0
[illegible]			20	20	15	15	0	0	0	0
[illegible]			10	10	10	10	0	0	0	0
[illegible]			30		30		0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	2	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	10	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	10	5	0	0	0	0
[illegible]			10		10		0	0	0	0
[illegible]			5	2	5	2	0	0	0	0
[illegible]			5	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	5	5	1	0	0	0	0
[illegible]			5	5	5	1	0	0	0	0
[illegible]			3	3	3	2	0	0	0	0
[illegible]			2	2	2	1	0	0	0	0
[illegible]			5	2	5	2	0	0	0	0
[illegible]			4	2	5	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	15	10	10	0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]			10	5	5	3	0	0	0	0
[illegible]			15	15	10	10	0	0	0	0
[illegible]			10	5	5	3	0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]			8	3	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			30	10	30	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]			30	10	30	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]			15	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	3	5	3	0	0	0	0
[illegible]			4	3	5	5	0	0	0	0
[illegible]			5	5	3	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0

Translation Times for the
OMS PRODUCT
All Costs in Minutes

Activity Type

Branch Type [illegible]

Date [illegible]

Service

Form	Comment Title	Quantity	TLC COST First	TLC COST Subsequent	SOC COST First	SOC COST Subsequent	TOTAL TLC SUB	TOTAL TLC COST	TOTAL SOC SUB	TOTAL SOC COST
TOTALS							0	10	0	5
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible] (2 3 4)			5	5	2	2	0	0	0	0
[illegible] (2 3 4)			12	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]			11	10	5	5	0	0	0	0
[illegible]			9	3	2	2	0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]			15	12	12	5	0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			12	5	5	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]			12	5	5	2	0	0	0	0
[illegible]			10	8	5	3	0	0	0	0
[illegible]			5	2	2	2	0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	10	10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]		1	10	10	5	5	0	10	0	5
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]							0	0	0	0

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type
Switch Type DMS-100 FAMILY
Date [illegible]
Service

Form	Command Title	Quantity	TSC COST First	TSC COST Subsequent	SOC COST First	SOC COST Subsequent	TOTAL TSC BUS	TOTAL TSC COST	TOTAL SOC BUS	TOTAL SOC COST
TOTALS							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]					30	30	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			20	10	12	12	0	0	0	0
[illegible]			15	10	12	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]					10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			20	10	12	10	0	0	0	0
[illegible]			20	10	10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]					12	12	0	0	0	0
[illegible]					45	45	0	0	0	0
[illegible]					10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]					45	45	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	3	1	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	3	5	5	0	0	0	0
[illegible]			3	3	3	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			20	15	10	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	3	5	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0

Transaction Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type

Switch Type DMS 100 FAMILY

Date [illegible]

Software

Form	Command Title	Quantity	TSC COST First	TSC COST Subsequent	BOC COST First	BOC COST Subsequent	TOTAL TSC SUB	TOTAL TSC COST	TOTAL BOC SUB	TOTAL BOC COST
TOTALS							30	30	10	15
[illegible]			10	2	5	1	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	15	10	12	0	0	0	0
[illegible]			15	15	10	10	0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]			5	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	7	7	7	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	12	10	12	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			12	3	5	1	0	0	0	0
[illegible]			5	1	5	1	0	0	0	0
[illegible]			3	3	3	3	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			11	11	11	11	0	0	0	0
[illegible]							0	0	0	0
[illegible]			2	2	2	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]		3	13	10	5	5	20	30	10	15
[illegible]			5	5	2	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	5	3	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			30	5	11	1	0	0	0	0
[illegible]			5	3	2	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]			30	15	20	15	0	0	0	0

Transaction Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type | Date: [illegible]

Bundle Type: DMS 100 FAMILY | Service

Form	Common Title	Quantity	TXC COST Full	TXC COST Subsequent	BOC COST Full	BOC COST Subsequent	TOTAL TXC SUB	TOTAL TXC COST	TOTAL BOC SUB	TOTAL BOC COST
TOTALS							0	0	0	0
[illegible]				10	10		0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	12	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	2	5	4	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]		1			1	5	0	0	0	7
[illegible]		1			2	3	0	0	0	3
[illegible]			10	5	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]			5	2	2	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	2	5	4	0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			12	5	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	2	2	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	5	3	0	0	0	0

Transaction Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type

Switch Type DMS-100 FAMILY

Date [illegible]

Services

Form	Command Title	[illegible]	TSC COST First	TSC COST Subsequent	BCC COST First	BCC COST Subsequent	TOTAL TSC SUB	TOTAL TSC COST	TOTAL BCC SUB	TOTAL BCC COST
TOTALS							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	5	5	3	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Resource Group		15	15	10	10	0	0	0	0
[illegible]	Resource Inventory		15	15	10	10	0	0	0	0
[illegible]	Resource Member		15	15	10	10	0	0	0	0
[illegible]			15	10	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]					5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Scan Point Assignment Table		5	2	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]	Signal Distribution Point Assignment Table		5	2	5	[illegible]	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]					11	11	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			5	2	5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type

Tooth Type   DMS 100 FAMILY

Date: 3/13/96

Author:

Form	Comment Type	Quantity	TLC COST First	TLC COST Subsequent	BCC COST First	BCC COST Subsequent	TOTAL TLC Bug	TOTAL TLC COST	TOTAL BCC Bug	TOTAL BCC COST
TOTALS							61	61	80	76
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			11	10	12	3	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]		1	5	2	5	2	0	1	0	5
[illegible]		8	10	8	5	2	5	15	2	7
[illegible]		30	3	2	5	3	56	83	56	67
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			3	3	5	3	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	10	5	3	0	0	3	3
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type
Date [illegible]

Switch Type DMS 100 FAMILY
Service

Form	Command Text	Quantity	TSC COST First	TSC COST Subsequent	SCC COST First	SCC COST Subsequent	TOTAL TSC BUS	TOTAL TSC COST	TOTAL SCC BUS	TOTAL SCC COST
TOTAL F							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
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[illegible]							0	0	0	0
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[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	12	5	5	0	0	0	0
[illegible]			10	10	5	5	0	0	0	0
[illegible]			15	15	10	12	0	0	0	0
[illegible]			15	15	10	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	15	12	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]					5	2	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	15	5	5	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			10	5	10	5	0	0	0	0
[illegible]	Uniform Call Distribution Group message(s)		30	15	15	10	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]			15	15	[illegible]	[illegible]	0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0
[illegible]							0	0	0	0

Translation Times for the
DMS PRODUCT
All Costs in Minutes

Activity Type:

Switch Type: **DMS-100 FAMILY**

Form	Command Title
[redacted]	
xpmlfp	

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252 (b) of the Telecommunications Act of 1996 to establish an Interconnection Agreement with Southwestern Bell Telephone Company	)))))))	Case No. TO-98-115

AFFIDAVIT OF BARBARA A. SMITH

I, Barbara A. Smith, of lawful age, being duly sworn, depose and state:

1. My name is Barbara A. Smith. I am presently Area Manager- Product Development Costs, Analysis and Regulatory for SBC Telecommunications, Inc. My qualifications and work history are attached as (Smith) Attachment 1.

2. In response to the Costing and Pricing Report, Volume 2 issued on July 24, 1998, I have examined the various recommendations made by the Staff. The purpose of my affidavit is to rebut portions of Costing Report submitted by Staff. Mr. Barry Moore is also filing an affidavit rebutting portions of the cost recommendations made by the Staff.

Local Switching Features ISDN and Analog

3. SWBT has proposed a $5.00 per order service order charge for every order that generates a service order on a mechanized basis, including local switching features. Staff believes the $5.00 service order charge applies to an "as is conversion" for resale or UNEs, not for other services or features.

4. SWBT does not completely agree with Staff's supplemental recommendation on May 29, 1998 which was (1) for subsequent orders UNE service order charges will apply, (2) all simple orders are assumed to be fully automated with 95% flow through of the work order to completion and (3) complex orders are assumed to be fully manual. SWBT agrees with number (1) and (3) but does not agree with (2). I will discuss fallout and manual versus mechanized in this affidavit.

5. Staff assumes that SWBT's UNE Operations Support Systems (OSS) are fully mechanized (they are not, even for SWBT's retail services) for ordering and provisioning UNEs. In discussions with Staff, Staff stated that they did not advocate a "scorched earth" view of SWBT's telecommunications network, yet by assuming all mechanized OSS, Staff imposes a theoretical OSS network, ignoring SWBT's current efficient OSS (See affidavit of Randal Vest), which includes some manual processes which vary depending upon the type of UNE, both in provisioning and in ordering systems. Staff assumes that since all processes are mechanized, the only manual intervention would be needed in the case of a "fallout" of an order, either at the time of ordering or further along in the OSS process needed for provisioning of the UNE. For SWBT provisioning purposes, it still encounters manual activity requirements, such as switch translations activities, field cross connect activity, etc., along with the fallout activity as SWBT has defined it above. These normal manual activities continue to be required to provide both SWBT retail services and UNEs. Thus, the probability of manual activity which is normally required has to be factored into the cost of provisioning. The use of 5% manual fallout rate greatly underestimates SWBT's likely incurred costs.

6. Staff is recommending a 5% fallout percentage presumably based on a data request response that SWBT provided to Staff regarding SWBT's current CLEC fallout percentage for SWBT's retail Easy Access Sales Environment (EASE) which is also used to process resale orders. It is incorrect to use the fallout percentage for EASE because EASE is used by CLECs only to order resold services, not UNEs. Also, EASE is a front office system used strictly for ordering , not the many more complicated tasks associated with the provisioning of UNEs (complex ordering or back office systems). Staff's fall out percentage would not apply to any of SWBT's other downstream OSS, for example translations in the central office. At the present time, we do not have any history on exact "fall out" percentage in the UNE environment. We do know the fallout rate for Access Service Requests (ASR) for IXC access services and that rate would more accurately approximate the CLEC ordering environment in both systems. We do know that CLECs have improved their EASE ordering processing and expect UNE to follow a similar path, assuming proper training, etc. ASRs have been submitted to SWBT by the IXCs since the mid 1980s and the current fallout rate is 30 –50%. Even though there is a similarity between CLEC UNE orders and ASRs, access service orders are actually less complex than many of the orders for resold services or UNEs, so it is probable that the fallout could be similar.

7. By requiring 95% flowthrough (also can be viewed as 5% fallout) one assumes that the flow through rate achieved with EASE can be achieved with any electronic interface used to perform ordering, preordering and provisioning of UNEs, which is incorrect and will lead to under recovery of SWBT's costs. The majority of SWBT's nonrecurring costs for service orders, translations etc., have been drastically

reduced as a result of this fallout assumption. Essentially what this assumption does is to apply .05 to SWBT's existing nonrecurring costs, so for example, a nonrecurring cost that was $100 before, becomes $5.

8. The Commission did not order SWBT to use EASE for anything other than its intended use. Even used properly for retail and resale service orders, EASE has its limitations. EASE cannot be used for all telecommunications services or with all residential or business accounts due to the complexity or wide variations of configurations. For example, residential EASE can only be used for pre-ordering and ordering activities for a residential account having up to five (5) access lines. Business EASE is limited to pre-ordering and ordering activities for a business account with up to thirty (30) local access lines Plexar I and DigiLine. In addition EASE cannot be used to order any of the following:

Plexar II and Plexar Custom

ISDN (with the exception of DigiLine)

Advanced Intelligent Network

Private Line Services

Off Premise Extension

Preferential Hunting

Rearrange Hunting

9. Also, EASE cannot be used to change the classification of local service, i.e. business to residence; residence to business. In each of these types of instances and for other similar complex services, manual processing by SWBT representatives is

required to place the service order into SORD. This is true regardless of whether such order is placed for a SWBT retail customer or by a CLEC.

10. SWBT makes the same EASE available to CLECs and its service representatives in the same manner and for the same services as it is available to SWBT's service representatives. Thus, identical service orders (i.e. same data, same format) submitted by a CLEC service representative and a SWBT service representative will be processed identically, and achieve the same flow through rate.

11. EDI or LEX is used instead of EASE to order UNEs. EDI is an off line, batch application that allows a CLECs local service requests (LSRs) and some UNEs to be electronically transmitted in a format which conforms to the Ordering and Billing Forum/ Telecommunications Interface Forum (OBF/TCIF) national guidelines. LEX, also an offline batch application, uses a Graphical User Interface (GUI) developed by SWBT that allows CLECs to electronically create and transmit LSRs for some UNEs to SWBT.

12. Not all UNES can be ordered using LEX or EDI in that the OBF/TCIF has no standards for all UNE LSRs. Some examples of UNEs with no electronic request capabilities are :

Analog Line Switch Port with Centrex features

BRI Switch Port with Centrex features

PRI Switch Port

DS1 Trunk Port

Analog Trunk Switch Port

13. AT&T assumes electronic delivery of all orders and at 98% error free, a process it says is forward looking. Yet it assumes a process that AT&T is incapable of using; AT&T cannot transmit orders in electronic format – it lacks the capability and must use manual delivery at the present time, although AT&T has asserted in other forums that it has improved implementation processing under development and has done some interactive testing with SWBT.

14. In April, 1998, SWBT implemented flow through capability for the most common order types of UNEs. Of course, EDI flowthrough is not possible until a CLEC has fully developed and tested its side of the EDI application. For example, although ordered by the Texas Commission to have their side of the EDI ready by October 1, 1998 for this ordering capability of UNEs, AT&T has gone on record stating that their side of EDI will not be ready until the first quarter of 1999.

Unbundled Call Trace Per Activation

15. SWBT originally proposed nonrecurring costs based on the average time to process the activation on a per occurrence basis, set up the trace and send a warning letter. In the future, these activities will be conducted on an automated basis and Staff recommends the costs should be based on the automated process, not the manual process. SWBT agrees with Staff's recommendations in this arbitration and has no additional comments.

Direct Inward Dialing

16. It is my understanding that SWBT and AT&T have agreed upon the rate for DID. SWBT has no additional comments.

Unbundled PRI Port Features

17. Staff recommends cutting the nonrecurring rates for port feature activation by half. Staff states it cannot judge if SWBT or ATT translation activation work times are correct.

18. Staff's recommendation should not be adopted. The SWBT cost studies properly estimated work times. Additionally, as the affidavit of SME Sharon Sadlon demonstrate, the time estimates are conservative at best. SWBT work times are correct because they are produced by people/organizations doing the work on a regular and ongoing basis. The translations times have been provided by Subject Matter Experts (SMEs) who have over 10 –20 years of experience in doing translations work for SWBT. The translations times were developed by the SMEs, provided to nine field managers for verification and then further validated by the SMEs in a lab environment by an individual time and motion study. (See the affidavit of Sharon Sadlon) AT&T's time estimates were provided by a national team of "experts", none of whom have any recent experience in the local telephone company environment or even in Southwestern Bell's territory. The level of documentation for SWBT's translation times is in stark contrast to information from AT&T. AT&T provided no time and motion studies and little or no supporting documentation for their time estimates.

19. Staff agrees that port feature activations involve more work than analog or BRI port features and also agrees that they require translation work time. Accordingly, it would be incorrect to cut SWBT values by half even if there were some reason to give credibility to AT&T's estimates, which there is not.

20. SWBT also disagrees with the global modifications which specify four rate zones. That global modification is not relevant to the nonrecurring port feature activation cost because the time for translations activities does not differ based on the rate zones.

Unbundled BRI CSV/CSD/Unbundled BRI Port Features

21. Staff believes that there is no translation activity difference between BRI features and other Local Switching features, therefore the same rates (developed from the nonrecurring time estimates) should apply. In fact, there is a difference in activity, which affects the cost. The difference between these nonrecurring costs and other basic local switching features is that there is no mechanized flow through for BRI CSV/CSD Unbundled BRI Port features. Instead, all translation activities are input manually. The same is true for these features offered to SWBT's retail customers. The basic Electronic Key Telephone System (EKTS) feature package consists of 8 features. The Call Handling Call Appearance (CACH) feature package consists of 11 features. Like a hunt group where the translations are built by manually inputting numerous individual terminals or telephone numbers and special hunting parameters, such as rotary hunting instructions, these two BRI feature packages are manually combined or built to package the many different features. In addition, these orders must be manually reviewed by the Recent Change and Memory Administration Center (RCMAC), which is responsible for inputting the line translations into the switch.

Unbundled Centrex Like Features – Analog/ISDN

22. Staff also assumes that there is no difference in the translation activity between Centrex-like features and other local switching features, therefore the same rates

(developed from the nonrecurring time estimates) should apply. This is incorrect. While it may be correct to assume that the majority of the orders for local switching features are flow through, this is not true for Centrex-like features.

23. Local switching features are line-side features that are not provided in a customer- specific common block arrangement, which is required for Centrex or Plexar. Because of this, local switching features typically only require the involvement of the RCMAC group. In most cases, there is no need for the Central Office Translation Specialists or the Communications Technicians to be involved with these simple features. These groups are required to input the translations for Centrex Like features.

24. Centrex-Like features, on the other hand, require additional manual work effort over and above what is done for local switching features. For example, Line Translation Specialists in the RCMAC group, are required to manually type service orders into the system due to customer specific dialing plans and because Centrex offerings include more complex common block-based features that cannot be recognized by the MARCH system. (For a description of the MARCH system, see affidavit of Merri-Lynn Owens). Additionally, Centrex-like features often require the involvement of additional work groups to perform other manual activities. As an example, Central Office Translation Specialists and Communications Technicians are required to perform manual activities to activate memory in the switch as well as to define customer parameters.

LIDB

25. LIDB is a SS7 service. Staff reviewed other SS7 services in the First AT&T arbitration and made recommendations regarding utilization levels for the SS7 equipment. All of the recommended STP Utilization changes recommended by Staff

previously are reflected in the Missouri 1997 Line Information Data Base (LIDB) Validation Query study dated June 9, 1997. The study was provided to the Staff in meetings when they reviewed studies in early 1998.

26. SWBT proposed using the actual utilization of the SS7 network in its studies, as a reasonable projection of a forward looking, dynamic utilization. Staff disagreed and recommended using a higher projected utilization rate. These projected utilizations overstate what SWBT can be expected to experience. Current utilizations are the best representation of a relationship where some services may increase and some may decrease due to the changing industry.

27. The growth amounts also contradict Staff's position requiring removal of inflation from the studies, since it is inconsistent to assume growth which may not be experienced, while disallowing inflation which will be experienced. The criteria seems based on artificially reducing the cost below what is actually experienced rather than any real concerns Staff may have with SWBT's cost study.

28. Staff recommends cutting the service order charge for LIDB in half due to "lack of evidence to support the labor times". The LIDB service order time estimates were provided by the SMEs actually processing LIDB service orders today, Processing LIDB service orders is a manual effort where the Service Representative discusses with each individual customer their specific requirements to determine what they want included in their database and then actually processes the order. LIDB service orders are limited to the first time the CLEC orders the service, so the low incidence of orders would not warrant mechanizing the process. This time to process a LIDB service order is not in any way impacted by the fall-out rate because it is totally a manual process.

Complex Service Conversion Charge - Resale

29. Staff makes a recommendation to cut the nonrecurring charges (based on nonrecurring time estimates) in half. This recommendation has no basis. SWBT's time estimates were based on assumptions and specific knowledge of SWBT's operations and the time it takes to perform these operations. The SWBT time estimates were provided by subject matter experts who have experience in performing the task at hand, who work in the field performing these tasks daily and who have the knowledge and experience to provide quality data for our cost studies. AT&T's estimates were provided by an undefined "national team" and were not based on any specific knowledge of SWBT Missouri operations.

30. Based on the documentation provided by SWBT, in support of its nonrecurring cost studies, SWBT clearly has more "sound justification and support" than AT&T. AT&T provided no documentation in support of its nonrecurring time estimates or its hypothetical fall-out rate.

31. SWBT validated the times used in the nonrecurring studies. The time estimates provided by the subject matter experts (SMEs) were validated by the cost analysts by comparing the times to prior cost studies and services with similar assumptions.

Unbundled Service Order – UNE Complex

32. Staff recommends reducing the time estimates in this study that pertain to typing and negotiation. Many of the time estimates for the UNEs were based on data used for SWBT's retail service cost studies. Many of SWBT's retail services, like Plexar (also known as Centrex) are considered competitive and it would not benefit SWBT to

provide high time estimates for these or any other services. The same principle applies to the UNE time estimates.

33. There is not a completely mechanized process in place for UNE service orders. Although service order processing must meet Ordering and Billing Forum/Telecommunications Interface Forum (OBF/TCIF) national guidelines, OBF standards exist currently, only for loops, analog port and loop with INP. With some UNEs there is no mechanized order delivery process for the SWBT retail services composed of the same elements. However the UNE order is received into the OSS process like all other SWBT retail services where mechanized OSS is applicable.

34. Although all SWBT's OSS will be available and will be used in provisioning UNE orders, e.g. SORD, SOAC, FACS, etc., I will explain which OSS (e.g. CPC or SCC) is used for service orders and the process to enter the order into the OSS provisioning flow through SORD. It is not correct to assume that all UNE orders will be mechanized and that those that are mechanized will flow through.

35. Staff states that it is appropriate to assume a mechanized ordering process for a number of network elements. This is incorrect. SWBT is in the process of developing mechanized order generators, which will accept an order electronically from AT&T. However, all UNE orders cannot be accepted and flowed through electronically at this time and in some cases ever. This is also true for a number of SWBT's retail services that are so complex, they must be entered manually for the service order process (e.g. DS-1).

36. Also, there are many CLECs who find it more cost effective to process their own orders manually. For Staff to assume that all orders in the future will be

processed electronically is incorrect. To manually process a UNE order negotiation or coordination and typing time are required.

37. Staff makes a recommendation to reduce the time estimates for SWBT's nonrecurring studies. which is without any basis. SWBT's time estimates were based on assumptions and specific knowledge of SWBT's operations and the time it takes to perform these operations. The SWBT time estimates were provided by subject matter experts who have experience in performing the task at hand, who work in the field performing these tasks daily and who have the knowledge and experience to provide quality data for our cost studies. AT&T's estimates were provided by an undefined "national team" and were not based on any time and motion studies.

38. Based on the documentation provided by SWBT, in support of its nonrecurring cost studies, SWBT has more "sound justification and support" than AT&T. AT&T provided no documentation in support of its nonrecurring time estimates or its hypothetical fall-out rate.

39. SWBT, however, has a sound basis for its assumptions. While there is no history of exact fall-out in a UNE environment, nor could there be at this early stage, ASRs have been submitted to SWBT by the IXCs since the mid 1980s and the current fallout rate is 30 –50%. Access service orders are less complex than many of the orders for resold services or UNEs, so it is not improbable that the fallout could be as high or higher since CLECs impact their own orders and SWBT has no control over CLEC service representative training.

40. For Complex service orders, Staff recommends the negotiation time be cut in half and the typing time be reduced to 15 minutes. Staff seems to have a

misunderstanding of the meaning of "Negotiation" in the UNE environment. Negotiation has nothing to do with developing the contract or price. Negotiation in the UNE environment involves coordination activities associated with the validation process as well as coordinating frame due dates or dispatch required. The validation process includes activities such as receiving the order, reviewing the order for accuracy, possibly sending /calling back to the CLEC for correction. The validation process must be completed before orders can be typed into SORD.

41. Coordination with other departments (Network Sales Support, Routing Managers, Circuit Provisioning Center, etc.) is required to process Complex orders.

42. Listed below are the steps typically involved in processing a Complex order:

RECEIVE LOCAL SERVICE REQUEST FOR COMPLEX SERVICE

1. Log , Stamp date and time received.
2. Review Local Service Request (LSR) for completeness and accuracy.
3. All fields on the LSR must be validated. Examples of validation include activities such as (1) logging on to PREMIS and confirm accuracy of address (2) pulling up Customer Service Records and comparing Telephone Numbers, end users name and address. If errors are found, the CLEC will be contacted for a Supplemental (Supp) to LSR to correct errors. Once Supp is received, the LSR must be reviewed again to insure Supp corrected the errors and did not create new errors.

3a. Review contract for services ordered and associated rate elements.

4. Coordinate with Circuit Provisioning Center (CPC) for

   DS1 or DS3 CLF assignments

   Critical dates

   Possible for facility availability for Primary Rate Interface (PRI) services

5. Coordinate with Network Sales Support for:

   Service Availability (e.g., verify if requested Port Features are available in the requested office switch)

   Centrex Services

   PRI Services

   DID Services

   Critical dates

6. Coordinate with Line and Number Administration Center (LNAC) for:

   DID numbers

   Other numbers

7. Assign order information to LSR:

   Billing Account Number (BAN) if required

   SWBT SORD order number(s)

   Critical dates

8. Send confirmation to CLEC

NXX Migration

43. The Staff recommends cutting SWBT NXX Migration rates in half. When a CLEC requests that SWBT move an entire NXX to their switch, SWBT incurs

expense and should be compensated. . The migration requires network rerouting effort and equipment record changes. That effort is caused by the CLEC's activities but is not reflected, or compensated for, in any of the nonrecurring charges for individual UNEs. The efforts are in addition to whatever it takes to establish the UNEs.

44. Staff's comments noted that AT&T felt "all costs will be recovered internally through migrating an NXX'" misses the point that a CLEC is specifically causing this shift. Other CLECs and retail customers should not have to cover the cost being caused by one CLEC in a specific situation. There would be no reason for SWBT to incur that cost if not for the CLEC.

45. AT&T prognosticators do not deal with SWBT systems and procedures, including the extensive coordination. Therefore, SWBT's time estimates reflect reality and should be accepted.

46. Staff recommends that a NXX Migration Charge be developed. That recommendation is inconsistent with how NXX Migration works. A NXX Migration will involve work done for switches in all zones, but it is unlikely one NXX migration would involve all the switches of one zone.

Time Estimates Proposed by Staff and AT&T

47. Staff repeatedly states in its comments that SWBT has no time and motion studies, therefore SWBT's nonrecurring costs should be cut in half. AT&T also has no time and motion studies. Because of the wide variance in the time estimates proposed by AT&T and SWBT, Staff recommends the nonrecurring costs be halved. However, SWBT has reviewed AT&T's nonrecurring Task Oriented Cost (TOC) studies that it conducts for its own internal use, developed by an AT&T cost group in New

Jersey. SWBT made a comparison of AT&T's TOC studies for the activities and time estimates required to provision a DS1 and DS3 circuit with SWBT's own nonrecurring studies proposed in the First AT&T Arbitration, Case No. TO-97-40, and found them to be similar. (See (Smith) Attachment 2 and 3) AT&T's own Nonrecurring Cost Model, submitted to Staff in this arbitration, proposes time estimates much, much lower than its own internal TOC studies. Given the fact that AT&T produces two different time estimates for the same type of service, one for arbitration studies and one for its own internal use, and its internal TOC studies validate SWBT's studies, AT&T's UNE time estimates should not be taken as credible, nor should they be used as a basis by Staff to cut SWBT's nonrecurring costs in half.

48. For these reasons, SWBT asks the Commission to reconsider the methodology and assumptions presented in SWBT's cost studies in this case.

Barbara A. Smith

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

Subscribed and sworn to before me on this 24 day of August 1998.

Notary Public

KEVIN K. SELSOR
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP. JULY 6, 2000

Summary of Work Experience and Qualifications

Work Experience

Q. Please outline your work experience.

A. I began my career with Southwestern Bell in December of 1978 in the Cost Studies organization at General Headquarters. I have held various positions in Cost Studies from 1978 to the present. In these positions, I was responsible for the production of cost studies and the development of cost methodologies for various products and services for Arkansas, Kansas, Missouri, Oklahoma and Texas. In my current position I am responsible for developing policy, methodology and witness support for the cost studies organization.

Education Background

Q. What is your educational background?

A. I received my Bachelors degree from the University of Missouri in Columbia, Missouri in 1978.

Q. Have you previously filed testimony?

A. Yes. I have filed testimony in the following dockets:

Date Filed	State	Proceeding Number	Subjects Addressed
1991	Texas	Docket 9695	Call Control Options
1992	Texas	Docket 10687	SmartTrunk (Direct)
1992	Texas	Docket 11177	SS7-Interconnection

Date Filed	State	Proceeding Number	Subjects Addressed
1992	Missouri	Case 93-116	Classification of Competitive Services
1993	Texas	Docket 10687/10655	SmartTrunk/DigiLine (Supplemental)
1993	Texas	Docket 12118	Caller ID
1993	Texas	Docket 10962	Open Network Architecture
1995	Missouri	Case TR-95-322	Establishment of Rate Bands for 800 MaxiMizer
1995	Missouri	Case TR-96-28	Increase in Local and Toll Operator Service Rates
1996	Texas	Docket 14940	Interim Number Portability (INP)
1996	Missouri	Case No. 96-405	Multipoint Video Service
1996	Kansas	Docket 190,492-U	General Investigation into Competition
1996	Texas	Docket 16226, 16285, 16196, 16189	Arbitration of AT&T, MCI, Teleport Communications and MFS Communications
1996	Missouri	Case Nos. 97-40, 97-67	Arbitration of AT&T and MCI
1996	Oklahoma	Cause No. PUD 960000218	Arbitration of AT&T
1996	Kansas	Docket 97-SCCC-167-ARB	Arbitration of Sprint
1997	Kansas	Docket 97-ATT-290-ARB	Arbitration of AT&T
Date		Proceeding	

Filed	State	Number	Subjects Addressed
1997	Arkansas	Docket 96-395-U	Arbitration of AT&T
1997	Kansas	Docket 97-SCCC-149-GIT	Generic Proceeding for SWBT's Rates for Interconnection, Unbundled Network Elements and Resale
1997	Kansas	Docket 97-BCSC-547-ARB	Arbitration of Boulevard Telephone Company
1997	Texas	Docket 16890	Public Coin
1997	Missouri	Case No. 98-14	Arbitration of TCG
1997	Oklahoma	Cause No. PUD 970000213	Application by Cox Oklahoma Telecom for Determination of Permanent Rates for Unbundled Network Elements of SWBT
1997	Oklahoma	Cause No. PUD 970000442	Application by SWB and AT&T for Determination of Costs and Permanent Rates for all Non-UNE SWBT Services
1998	Texas	Docket 17759	Complaint of KMC Telecom Inc. Against SWBT for Violations of Section 251 © (4) of the Telecommun8cations Act of 1996
1998	Kansas	97-SCCC-149-GIT	In the Matter of Joint Application of Sprint et al., for the Commission to Open a Generic Proceeding on SWBT Rates for Interconnection, UNE, Transport and Termination and Resale

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COMPARISON OF AT&T TOC TIME ESTIMATES TO AT&T & SWBT UNE TIME ESTIMATES DS1

Below is a DS1 IO comparison between the following studies: The AT&T "DS1 IO TOC study", the AT&T "DS1 IO UNE study" and SWBT's DS1 IO UNE study". AT&T's TOC study came in part from the AT&T binder entitled "Digital Facility Provisioning & Maintenance (Bate Stamp 03537 - 03723).

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COMPARISON OF AT&T TOC TIME
ESTIMATES TO AT&T & SWBT UNE TIME ESTIMATES
DS3

Below is a DS3 IO comparison between the following studies: The AT&T "DS3 IO TOC study", the AT&T "DS3 IO UNE study" and SWBT's DS1 IO UNE study". AT&T's TOC study came in part from the AT&T binder entitled "Digital Facility Provisioning & Maintenance (Bate Stamp 03537 - 03723).

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company.	))))))	Case No. TO-98-115

AFFIDAVIT OF BARBARA MCCRARY-BAZZLE

I, Barbara McCrary-Bazzle, of lawful age, being sworn, deposed and state:

1. My name is Barbara McCrary-Bazzle. I am presently Area Manager-Translations for Southwestern Bell Telephone (SWBT) at 530 McCullough, San Antonio, Texas 78250. I understand that the Arbitration Advisory Staff filed a Costing and Pricing Report, Volume 2, on July 24, 1998. The Report recommends cutting Southwestern Bell's nonrecurring rates in half based upon the AAS opinion that Southwestern Bell does not have sufficient evidence to demonstrate the labor required to perform nonrecurring activities. The purpose of my affidavit is to explain the work I did by explaining the process I used to develop the time estimates used in the cost studies.

2. My primary responsibility is to develop and test Methods and Procedures for new service offerings in the 5ESS Lucent technology which is the primary switching technology utilized in SWBT's network. I also provide technical support to other staff employees on issues relating to the 5ESS switch. I support network operations organizations with activation and maintenance of switch based translations. I develop time estimates, as requested by the Cost Study organization, for switch based services and features for the 5ESS switch. I participate as SWBT's representative on a National

Forum of translations subject matter experts (SMEs) from all the RBOCs on the 5ESS Lucent switches.

3. I have been an employee of SWBT since 1968. I began as an operator, moved to a Clerical position in 1973, and the business office as a Service Representative in 1976. In September 1997, I was promoted to Central Office Manager responsible for Crossbar and 1E/1AESS switches. From 1982 to 1983 I held the position of RCMAC (Recent Change Memory Administration Center) manager. From 1983 to 1987 I reassumed the position of Central Office Manager responsible for 1E/1AESS and 5ESS switches. In January 1998, I acquired the position of Translations Manager and assumed the responsibility of developing, inputting and maintaining translations in Lucent, Nortel and Ericsson switch technologies. I was also responsible for office upgrades, converting 2BESS and 1ESS offices to digital Lucent 5ESS or Nortel DMS switches. In August 1996, I assumed my current position and have responsibility for Lucent 5ESS switches.

4. I developed several time estimate packages for preparation and implementation of switch based translations for various services, features and routing costs study requests.

5. I have been in my current position since August 1996. Any time estimates for cost study purposes for the 5ESS Lucent switch are completed by me. I have provided approximately twenty (20) time estimate packages.

6. I requested a review by field Translations Managers (TXCs), with whose work I am familiar, of the current 5ESS time template developed for Lucent recent change views, to develop time estimates. Their recommendations were incorporated in the

template. The field managers have similar skill levels and experience as I do and are actively involved in 5ESS translations on a daily basis.

7. The time estimates were developed to be reflective of an "average skill level" of the employee performing the task. The work force in Southwestern Bell is comprised of employees with varying levels of experience and time on the job. The time estimates reflect that variance and are targeted for an average work time. My skill level was required to research and develop time estimates.

8. The time estimates I prepared were specifically for the translations administration centers, which are referred to as the TXC. The translations activities, for which I prepared time estimates, are reviewed, prepared and implemented by Communications Technicians and Translations Specialists (Clerks).

9. Product teams comprised of individuals are responsible for implementing and managing UNE services. This team consists of personnel from Network, Billing, Marketing and Service Order Methods departments. The service and the exact way the service will be provided are discussed in detail at Product team meetings to ensure all participants have the same understanding before cost assumptions are made and the cost study is actually conducted. Information from the Product Team went into the preparation of the cost study.

10. I also used Vendor documentation to determine the appropriate recent change views applicable to this service. This same process is used for Southwestern Bell retail service and these are the exact same time estimates as those provided for Southwestern Bell retail services.

11. Southwestern Bell uses Mechanized Translations System (MTS) and Automated Processing of Recent Change Input Letters (APRIL) to create and input translations into the switches. UNE orders will use these same operational systems.

12. My consideration of the Mechanized Systems is reflected in the time submitted. To insure that the mechanized processes were properly taken into consideration in the time estimates, I requested field managers to review the 5ESS templates.

13. The time estimates also take into account the difference between Switch Translations and Line Translations. Switch translations encompass software characteristics that establish routing, charging, features and classes of service in the 5ESS switch to accurately route calls from an originating party to their destination while generating the appropriate billing record, if required. Switch translations define characteristics that effect entire classes of service. Switch translations must be established before an individual line can be assigned to a particular service. Line translation consists of individual characteristics or options that are specific to a particular line.

14. The difference between Central Office Translations Specialists (COTS) and Group 1 Craft time is the COTS time consists of 5ESS translations forms populated, in MTS, for the specific feature or service. MTS generates the recent change messages required for the feature or service. The Communications Technician (Group 1 Craft) reviews the messages for content and accuracy. If corrections are required the Communications Technician makes the appropriate changes and releases the packet to the

in the switch and the packet is completed in MTS. If MTS is not available for the specified switch the Communications Technician will manually input the recent change views. The time estimates reflect these different activities.

15. There are no system or routing translations that are fully automated. MTS and APRIL are mechanized processes, however both still require Central Office Translations and/or Communications Technicians to develop the complete translations packet and analyze the data before it is released to the switch. This process is necessary to insure correct information is input in the switch to provide good service and alleviate customer reports.

16. Currently, all Lucent 5ESS offices are not on MTS. Efforts are underway to evolve these offices to MTS when the cost/benefit analysis determines that these offices would benefit from mechanization. This benefits AT&T.

17. I provide support for approximately 147 Host and 385 Remote 5ESS switches in a five state area.

18. In SWBT's five (5) state area, nine (9) managers that supervise Central Office Translations Specialists and Communications Technicians provided input and recommendations to the time estimate template I forwarded to the field.

19. I maintain documents that reflect the translations requirements and back up the time estimates submitted in a database spreadsheet template. When a time estimate package is prepared, the spreadsheet becomes part of the package created based on the recent change views required to implement the service or feature.

20. I feel confident that the work I provided is accurate and reflects the true time required to perform translations work. My expertise is based on experience as a field

20. I feel confident that the work I provided is accurate and reflects the true time required to perform translations work. My expertise is based on experience as a field manager, management of employees that perform translations functions and my technical ability.

21. Attached hereto as Attachment A are the actual time estimates I prepared.

Further, affiant sayeth not.

Barbara McCrary-Bazzle

STATE OF TEXAS)
)SS
CITY OF SAN ANTONIO)

Subscribed and sworn to before me this 21st day of August, 1998.

JANIE GARCIA
NOTARY PUBLIC
State of Texas
Comm. Exp. 04-17-2001

Janie García
Notary Public

My commission expires:

4-17-2001

Missouri TO-98-115
Time Estimates Provided
By: Barbara McCrary-Bazzle

Analog - Unbundled Local Switching Centrex-Like Features - 5ESS

System Charge	SCC	45 minutes
	TXC	1 hr. 25 minutes
Subsequent System Charge	SCC	45 minutes
	TXC	1 hr. 15 minutes
Call Waiting - Original	SCC	10 minutes
	TXC	10 minutes
Speed Call - Personal	SCC	15 minutes
	TXC	15 minutes
Dial Call Waiting	SCC	10 minutes
	TXC	10 minutes
Distinct Ring & Call Waiting	SCC	15 minutes
	TXC	15 minutes
Dir Call Pickup-Non Barge In	SCC	15 minutes
	TXC	15 minutes
Dir Call Pickup-Barge In	SCC	15 minutes
	TXC	15 minutes

Missouri TO-98-115
Time Estimates Provided
By: Barbara McCrary-Bazzle

ISND - Unbundled Local Switching Centrex-Like Features - 5ESS

System Charge	SCC	40 minutes
	TXC	1 hr. 20 minutes
Subsequent System Charge	SCC	40 minutes
	TXC	1 hr. 10 minutes
Distinct Ring	SCC	15 minutes
	TXC	15 minutes
Speed Call - Personal	SCC	10 minutes
	TXC	25 minutes
Call Pickup	SCC	15 minutes
	TXC	15 minutes

Missouri TO-98-115
Time Estimates Provided
By: Barbara McCrary-Bazzle

DID NONRECURRING - 5 ESS

	Preparation Time	Implementation Time
Initial	25	40
Subsequent	0	69
Total	25	109

Assume 1 span 24 trunks: Time estimate includes 5 minutes for first trunk and 3 minutes for each additional trunk (implementation only).

BEFORE THE PUBLIC SERVICE COMMISSION
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AFFIDAVIT OF LEONARD D. ELLIS

1. My name is Leonard Ellis. My business address is 530 McCullough, San Antonio, Texas, Room 3-S-1. I am employed by Southwestern Bell Telephone Company. My title is Area Manager - TIRKS, CPC Methods.

2. I have been an employee of SWBT since 1969. During my career I have held craft titles of Frameman and Teletypeman. I was promoted to management in 1976, and held the titles of Engineering Associate, Installation and Maintenance Foreman and Testing Foreman. In 1986, I was promoted to a second level management position on the Missouri State Staff supporting all provisioning activities in the state. In 1994 I moved to company headquarters and I am currently responsible for the development of provisioning methods for all Unbundled Network Elements (UNE).

3. The time estimates that were used to determine nonrecurring costs for unbundled network elements were developed in the following manner. The Cost Studies organization requested assistance in verifying time estimates for the nonrecurring UNE cost studies. Sixteen managers who supervise the clerks that perform the provisioning functions were asked to determine accurate estimates of the time required to perform each function. The managers received descriptions of the thirteen tasks and were asked to accurately estimate the

average time required to perform each of the functions listed. The thirteen functions were divided into two groups. Functions 1 through 4A were addressed by managers familiar with the order logging and loop input functions. Functions 5 through 12 were addressed by the managers familiar with the design function. Each group of managers discussed the specific tasks and jointly arrived at an accurate estimate for each function based on their personal on-the-job experience. The data was forwarded to the cost studies coordinator to be summarized.

4. Each of the managers that received the data requests had over fifteen years service with Southwestern Bell and over ten years experience in the Provisioning Center. Their backgrounds cover many areas of the provisioning process, all having experience with these services. All of the managers had direct responsibility for the types of services being studied.

5. The time estimates were developed to be reflective of an "average skill level" of the clerks who actually do the work. The work force in Southwestern Bell is made up of employees with varying levels of experience and time on the job. The time estimates reflect that variance and are targeted for an average work time.

6. I am confident that the time estimates are an accurate reflection of the actual time required. My confidence is based on my personal knowledge of the actual work required, and my confidence in the methods used to produce the estimates. The managers involved in determining the time estimates handle these functions daily and they are in the best position to determine the average time required to perform each task.

7. The position of AT&T that all of these functions can be done without any labor expended or a zero time estimate is arbitrary and unreasonable.

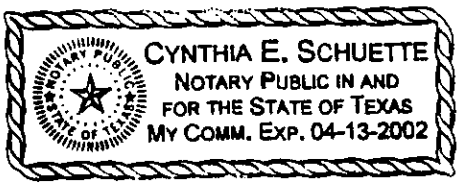
Leonard D. Ellis

Sworn to and subscribed before me this 21st day of August in the year 1998.

Notary Public State of Texas
County of Bexar

My commission expires: 4-13 2002

Cynthia E. Schuette
(Notary Public)



Leonard D. Ellis

Sworn to and subscribed before me this 20th day of August in the year 1998.

Notary Public State of Texas
County of Bexar

My commission expires: 12-08-2001

KATHLEEN A. VALDEZ
NOTARY PUBLIC
State of Texas
Comm. Exp. 12-08-2001

Kathleen A. Valdez (Notary Public)