

Exhibit No.:

Issues: Telephone Specific

Witness: William L. Voight

Sponsoring Party: MO PSC

Type of Exhibit: Direct Testimony

Case No.: TO-2005-0144

Date Testimony Prepared: November 18, 2005

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

DIRECT TESTIMONY

OF

WILLIAM L. VOIGHT

KANSAS CITY METROPOLITAN CALLING AREA PLAN

CASE NO. TO-2005-0144

**Jefferson City, Missouri
November 2005**

****Denotes Highly Confidential Information****

NP

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

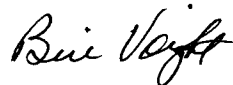
In the Matter of a Request for the)
Modification of the Kansas City)
Metropolitan Calling Area Plan to Make)
the Greenwood Exchange Part of the)
Mandatory MCA Tier 2.)

Case No. TO-2005-0144

AFFIDAVIT OF WILLIAM L. VOIGHT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

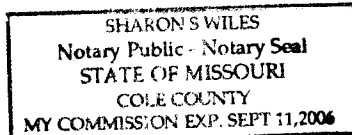
William L. Voight, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 21 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



William L. Voight

Subscribed and sworn to before me this 18th day of November, 2005.


Notary Public



My commission expires _____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DIRECT TESTIMONY
OF
WILLIAM L. VOIGHT
KANSAS CITY METROPOLITAN CALLING AREA PLAN
CASE NO. TO-2005-0144

Q. Please state your name and give your business address.

A. My name is William L. Voight and my business address is P.O. Box 360,
200 Madison Street, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission as a
supervisor in the Telecommunications Department. I have general supervisory
responsibility for staff recommendations pertaining to tariff filings, interconnection
agreements, and telephone company mergers and acquisitions. In conjunction with other
staff persons, I provide staff recommendations on a wide variety of other matters before
the Commission including rule makings, complaints filed with the Commission, and
Commission comments to the Federal Communication Commission (FCC). My duties
have also involved participation as a member of the Commission's Arbitration Advisory
Staff, which is comprised of subject matter experts who assist an arbitrator in disputes
involving the Federal Telecommunications Act of 1996. Lastly, I participate in and
coordinate special projects, as assigned by management. Examples of special projects
include Case No. TW-2004-0324, a Study of Voice over Internet Protocol in Missouri,
and Case No. TW-2004-0471, a Commission-appointed Task Force to study expanded
local calling in Missouri. As necessary and appropriate, I also provide assistance to the

Commission, upper management, and members of the General Assembly on legislative matters.

Q. What is your education and previous work experience?

A. I received a Bachelors of Science degree with a major in economics from Lincoln University in Jefferson City, Missouri. A copy of relevant work history is attached as Schedule 1.

Q. Have you previously testified before the Commission?

A. Yes, a copy of previous testimonies is attached as Schedule 2.

Q. What is the purpose of your Direct Testimony?

A. My testimony is responsive to the witness testimony presented at the local public hearing conducted in Greenwood on October 18, 2005. My testimony summarizes and addresses the technical aspects of the comments received by members of the general public. My testimony also expresses the Telecommunications Department Staff's (Staff) position on the "Final Recommendation" to address the Greenwood petition, as presented to the Commission by the Office of Public Counsel on April 29, 2005.¹

Q. What is the Staff's position on the "Final Recommendation" of the Office of Public Counsel?

A. The Staff does not oppose the proposal. It is unlikely that the Staff would oppose any reasonable solution that addresses the Greenwood citizens' petition.

Public Counsel's "Final Recommendation" is to incorporate the exchange of Greenwood into Kansas City MCA Tier 2. Additional rates to be paid by affected customers are \$2.00 for residential and \$3.00 for business customers.

¹ Office of the Public Counsel's Final Recommendation; Case No. TO-2005-0144; April 29, 2005.

1 **Q. If the “Final Recommendation” is ordered by the Commission, what**
2 **is the proposed revenue impact on Southwestern Bell Telephone Company (SBC)?**

3 A. On October 2, 2005, the Staff sent a Data Request to SBC requesting
4 information designed to quantify the revenue impact. On October 24th, SBC responded
5 that some of the data was not readily available. Since that time, SBC and the Staff have
6 continued to work together to quantify the revenue impact. I expect the full amount to be
7 known, and perhaps agreed upon by the Parties, within a week of this writing.

8 **Q. You have stated that your Direct Testimony primarily addresses the**
9 **technical matters reflected in the testimony taken at the Greenwood Public Hearing.**
10 **Given that only ** HC--** of the business and residential access lines in the**
11 **Greenwood exchange are non-MCA lines, couldn't the technical situation be**
12 **addressed by simply converting those non-MCA lines to mandatory MCA lines, as**
13 **would occur by implementing the “Final Recommendation” of the Office of Public**
14 **Counsel?**

15 A. Yes, for the most part. Converting access lines from optional MCA to
16 mandatory MCA removes most of the technical considerations that were expressed by the
17 witnesses at the Greenwood Public Hearing. For example, making Greenwood a
18 mandatory MCA exchange would permit all access lines in the Greenwood exchange the
19 ability to call the large and very widespread Lee's Summit R-7 School District, and the
20 Lee's Summit government offices. Calling these two entities represent the primary
21 example of what I would characterize as technical issues associated with the Greenwood
22 citizens' petition.

NP

1 However, much of the testimony taken at the Public Hearing reflects a continuing
2 confusion about what is referred to as the “return call feature” of MCA service. For
3 example, some witnesses testified that they have “all you can eat” long distance plans
4 that offer unlimited outbound calling, yet they feel a need to continue subscription to
5 optional MCA service in order to receive calls from other MCA subscribers. This
6 situation would largely dissipate by making Greenwood a mandatory Tier 2 exchange;
7 however, in my opinion, this situation will continue to exist in all other optional MCA
8 areas.

9 **Q. Will either optional MCA subscribers or non-subscribers be required**
10 **to change their telephone numbers if the Greenwood exchange is converted to a**
11 **mandatory MCA Tier?**

12 A. No, I see no reason for such changes, and I am unaware of any plans to do
13 so.

14 **Q. Will the “Final Recommendation” of the Office of Public Counsel**
15 **adversely affect the calling-scope of the Greenwood exchange customers?**

16 A. On balance, I believe the calling-scope proposal has far more pluses than
17 minuses. However, there is one area that will have the potential for negative impact.

18 **Q. Please explain.**

19 A. Greenwood is currently in optional MCA Tier 3. All Tier 3 MCA
20 subscribers (i.e., those that elect the option to purchase MCA service) are currently able
21 to call all other Tier 3 subscribers and *customers*. Customers are defined as those who
22 have not elected to purchase MCA service. If Greenwood is moved to Tier 2, it would
23 then become a toll call for everyone in Greenwood to call MCA Tier 3 customers. The

1 affected communities are Lake Lotawana, Grain Valley, Buckner, Missouri City,
2 Kearney, Smithville, Ferrelview, Platte City. Leavenworth, and Farley.

3 **Q. Please further explain your answer.**

4 A. Today, all MCA subscribers in the Greenwood exchange (i.e., those who
5 have elected to subscribe to optional MCA service) may call all lines in the above
6 communities, without incurring a toll call, irrespective of whether the called lines have
7 optional MCA service. That would change if Greenwood is moved to Tier 2. If
8 Greenwood is moved to Tier 2, it would then become a toll call to dial non-MCA lines in
9 the above named communities. Because of proximity to Greenwood, it would, in my
10 opinion, likely affect calls to Lake Lotawana and Grain Valley the most.

11 **Q. Can you provide a rough idea as to the magnitude of the potential**
12 **change you are talking about?**

13 A. The MCA subscription rate in Lake Lotawana is **** HC--- -**** (similar
14 data is not available for Grain Valley). The situation I am describing would impact
15 **** HC--- -**** of Lake Lotawana access lines' ability to receive calls from the new
16 Greenwood Tier 2 exchange. Stated differently, today **** HC--- -**** of Greenwood
17 access lines can call 100% of Lake Lotawana lines as a toll-free call. If Greenwood is
18 moved to Tier 2, 100% of Greenwood lines could call **** HC--- -**** of Lake Lotawana
19 lines as toll-free. The question of negative calling-scope impact came up at the
20 Greenwood Public Hearing and, in my view, the record should be clear in this regard.

21 **Q. What, in your opinion, were the witnesses primarily asking the**
22 **Commission to do about Greenwood?**

NP

1 A. The testimony expressed a desire to recognize the growth that has
2 occurred in the Lee's Summit/Greenwood area the past few years. Based on a majority
3 of the comments, most witnesses expressed a desire for all the citizens of Lee's Summit
4 to be treated equally by removing the MCA surcharge.

5 **Q. Is it possible to treat all citizens of Lee's Summit equally with regards**
6 **to the rates they pay for telephone service?**

7 A. No, not entirely. But the Office of Public Counsel's proposal would
8 provide a great deal more equality than exists today. The city of Lee's Summit
9 encompasses five different telephone exchanges and zone areas in Jackson and Cass
10 Counties. In my view, it is not possible for the telephone boundaries to match up with all
11 of the ever-changing political boundaries.

12 **Q. Please explain why it is a long distance call in some instances for**
13 **residents of the cities of Lee's Summit and Greenwood to call the local Lee's**
14 **Summit R-7 School District and the city government offices of Lee's Summit.**

15 A. It is a toll call (this means people have to dial the "1" before the number)
16 for Greenwood non-MCA customers (i.e., those with an 816-623 prefix) to call the City
17 of Lee's Summit School District offices (816-986) and the City of Lee's Summit
18 Government offices (816-969). The City of Lee's Summit and the Lee's Summit School
19 District subscribe to SBC's "SmartTrunk" service which, pursuant to SBC's tariff, is
20 provisioned out of SBC's Kansas City South switch. "SmartTrunk" is an Integrated
21 Services Digital Network (ISDN) service. While ISDN is offered in the Lee's Summit
22 zone of the Kansas City Metropolitan Telephone Exchange, the telephone numbers

1 associated with ISDN must be those of the serving office: in this case, the Kansas City
2 South zone.

3 The local calling scope for Greenwood non-MCA subscribers includes the Belton
4 and Lee's Summit zones of the Kansas City Metropolitan Telephone Exchange. Thus,
5 Greenwood exchange customers who do not subscribe to optional MCA service must dial
6 long distance to call the schools because SBC's telephone system is programmed to route
7 the calls to the K.C. South exchange, even though the schools are physically located in
8 the Lee's Summit and Greenwood telephone exchanges. As Representative Johnson
9 pointed out, this situation is particularly noticeable to residents in the city of Greenwood.
10 There, for non-MCA subscribers calling Greenwood Elementary School, it is a long
11 distance call even though the caller and elementary school are both physically located in
12 the Greenwood telephone exchange.

13 **Q. Please summarize Mr. Bob Hayter's comments.**

14 A. Mr. Hayter describes the frustrations of having an "all you can eat"
15 unlimited long distance calling plan, yet the subscriber finds it necessary to subscribe to
16 optional MCA in order to continue receiving local calls from other MCA subscribers and
17 customers. As stated: "[We can] call anybody in the country for \$20.00" [yet] "it costs
18 me \$12.35 to subscribe to a Metropolitan Calling Plan" [because] "it's not only us being
19 able to call somebody, it's people calling us." This witness is describing the "return call
20 feature" of MCA service. The "return call feature" describes peoples' ability to *receive*
21 telephone calls – not merely the ability to *make* telephone calls. It is also noteworthy to
22 state that optional subscribers who cancel MCA service are also required to change their
23 telephone number.

1 **Q. Please summarize the testimony of Ms. Nancy Dean.**

2 A. Ms. Dean changed service providers from SWBT to Sage for her
3 residential service, and to McLeod for her business service. Her residential service was
4 “reduced by about \$12.35 a month” and her business rate “also went down.” According
5 to Ms. Dean’s testimony, the new service providers told her that MCA was necessary
6 where she lived; however, it appears the charge for optional MCA does not appear on her
7 new telephone bills, or her base rate is lower. Although the record is not clear, I believe
8 it likely that her telephone numbers did not change because they were already assigned as
9 optional MCA numbers, irrespective of the service provider(s).

10 **Q. Please summarize Ms. Rachelle Vandiver’s comments.**

11 A. Ms. Vandiver is the general manager for Raintree Lake Property Owner’s
12 Association, located in the city of Lee’s Summit, but within the Greenwood telephone
13 exchange. Ms. Vandiver describes new residents moving into the area who have
14 obtained telephone service, yet they are unaware of toll charges associated with the 623
15 Greenwood prefix. Mr. Vandiver states that new customers seem to be “automatically”
16 issued a 623 prefix telephone number. I would characterize Ms. Vandiver’s testimony as
17 advocating for inclusion of Greenwood into MCA 2, and for improved customer
18 notification by SBC of toll charges associated with the 623 prefix.

19 **Q. Please comment on the testimony of Mr. James Metzger.**

20 A. Since the Greenwood hearing, I have been in further contact with
21 Mr. Metzger. Mr. Metzger describes switching to a competitive local exchange carrier
22 (C-LEC) only to be contacted approximately eight or nine months later by SWBT with a

1 “winback” enticement offering residential MCA service for \$2.00 per month instead of
2 \$12.35. Approximately three weeks later, according to Mr. Metzger, SWBT called again
3 and indicated the \$2.00 offer was no longer valid.

4 Mr. Metzger also presents a page from a private telephone directory (marked as
5 Exhibit 2 H.C.) for Raintree development. The directory shows a listing for ** HC-----
6 HC----- ** with a telephone number of ** HC----- **. This is inexplicable to
7 Mr. Metzger because all other [private] directory listings show prefixes of 537, indicating
8 Greenwood MCA tier 3 subscribers. Mr. Metzger seeks an explanation of why ** HC---
9 HC----- **, residing in the Greenwood exchange, is able to obtain a telephone number
10 from the Lee’s Summit zone.

11 Q. What has your inquiry revealed about this particular 524 prefix number
12 being used in Greenwood?

13 A. The SWBT response to Staff’s data request RFI No. 1-10 stated:

14 Southwestern Bell Telephone Company, L.P. d/b/a SBC Missouri
15 considers the information contained in this response to be Highly
16 Confidential under the terms of the Protective Order that was
17 entered in this case. ** HC-----

18 HC-----

19 HC-----

20 HC----- **

21
22 Q. Please respond to SBC’s response to your data request.

23 A. Staff sent numerous data requests to SBC to inquire about the Greenwood
24 exchange. Overall, SBC’s responses were timely, thorough, forthright, and more than
25 adequate. However, with this particular request, I don’t feel an adequate response was
26 received. My data request inquired as to the location of where the customer was “served”

NP

1 – not as to where he was receiving the bill. Subsequent discussions with SBC reveal that
2 the customer does have service at the named location in the Raintree development. This
3 would appear to be an example of an inadvertent assignment of a Lee's Summit zone
4 telephone number to a Greenwood exchange customer. There appears to be no further
5 explanation.

6 **Q. How is it possible to assign a Lee's Summit zone telephone number to**
7 **a location in the Greenwood exchange?**

8 A. There are several services that would permissibly allow customers of SBC
9 to have telephone numbers assigned to one exchange area but used in another. Examples
10 include Telebranch for business customers, and Foreign Exchange Service, most
11 commonly used by business customers. Another example, Preferred Number Service,
12 will be discussed further in my testimony. Yet another example, likely not permissible in
13 this instance, but similar to Foreign Exchange Service, is Virtual NXX service (VNXX).
14 VNXX is not tariffed by SBC and to my knowledge, is not a service offering of SBC.
15 VNXX is sometimes employed by C-LECs to provide access to the Internet, as well as to
16 implement local voice service. One possible explanation might have been a situation
17 where a C-LEC had originally assigned a VNXX number to a customer, only to later
18 have the customer switch to SBC, while having the number assignment ported from the
19 C-LEC to SBC in the process. However, none of these examples appear to apply to the
20 situation described in the testimony of Mr. Metzger.

21 **Q. Does SBC provide this customer with the appropriate calling-scope**
22 **for a customer in the Greenwood exchange?**

1 A. No. It would appear that the customer has the calling scope of a
2 mandatory Tier 2 Lee's Summit zone customer.

3 **Q. Does SBC bill this customer at the appropriate rate for a customer in**
4 **the Greenwood exchange?**

5 A. I have not examined this customer's bill nor have I pursued the billing
6 matter with SBC. Therefore, I do not know.

7 **Q. Should the Commission investigate the matter further?**

8 A. I would not recommend any further Commission inquiries at this time.
9 Although the full extent of the details are not fully known, this situation appears to
10 represent a one-time occurrence. The Staff has formally asked SBC to identify all
11 instances whereby Lee's Summit numbers are being used in Greenwood. SBC has
12 responded that it is continuing its efforts to identify the number of such accounts. Any
13 similarly situated accounts that are revealed will be investigated and responded to by the
14 Staff accordingly. To the extent a mistake has occurred, I would simply acknowledge the
15 mistake and move on. I can think of no circumstance in which I would recommend the
16 customer relinquish his number.

17 **Q. Please summarize the testimony of Mr. Tom Davis.**

18 A. Mr. Davis' testimony reflected the comments of other witnesses who
19 describe confusion with the MCA return call feature. Mr. Davis has an "all you can eat"
20 cellular plan, and regrets having to pay the MCA landline additive in order to be able to
21 receive toll-free calls at home. Witness Davis also expresses a need for more reliable
22 calling-scope information on the part of his local service provider, and questions the

1 \$12.35 MCA additive. Mr. Davis testified to difficulty in finding an alternative service
2 provider that did not also charge an additive for optional MCA service. In response to
3 Commissioner questions, Mr. Davis also stated the importance of having a landline
4 telephone in addition to a cellular telephone. In response to questions from the Office of
5 Public Counsel, Mr. Davis characterized his wireless service as complimentary to his
6 landline service. Lastly, to audience applause, Mr. Davis emphatically testified that users
7 in Greenwood should be treated “completely the same as the rest of Lee’s Summit.”

8 **Q. Please summarize the statements of John Shaffran.**

9 A. Mr. Shaffran is a retired telephone company worker whose testimony
10 questioned the manner in which SBC’s plant investments have been recovered through
11 the rates paid. Mr. Shaffran opposes being charged more than other residents of
12 Lee’s Summit.

13 **Q. Please summarize the testimony of Mr. Barton Reese.**

14 A. Mr. Reese reiterated many of the points made by Representative Johnson.
15 Mr. Reese describes having a non-MCA Greenwood number (the 623 prefix) and being
16 able to make local calls in Greenwood and to Lee’s Summit. However, he is not able to
17 call the Lee’s Summit School District or his employer, the City of Lee’s Summit, without
18 first dialing the “1”. Mr. Reese explained how this affects the ability to make
19 non-emergency calls to a centralized fire dispatch number in Lee’s Summit. Mr. Reese
20 expressed that his local service provider was unable to answer questions about the
21 inability to call the Lee’s Summit city offices. In response to Commissioner questions,
22 Mr. Reese described how 623 prefix subscribers with school children are negatively

1 impacted by an inability to call among the area served by the Lee's Summit R-7 School
2 District. As with other witnesses, Mr. Reese testified to confusion about the MCA return
3 call feature.

4 **Q. Please summarize and provide your analysis to the testimony of**
5 **Mr. Mike Hammonds.**

6 A. Mr. Hammonds testified to formerly living in Lee's Summit where he had
7 an MCA tier 2 telephone number designated with a 554 Lee's Summit prefix.
8 Mr. Hammonds then moved to the Greenwood exchange, and was able to keep the 554
9 Lee's Summit number. Once located in Greenwood, Mr. Hammonds then subscribed to a
10 Greenwood 623 prefix number. Mr. Hammonds described a situation where both
11 numbers ring on the same Greenwood 623 telephone.

12 Mr. Hammonds is describing SBC's Preferred Number Telephone service. The
13 service is one of many variations of call forwarding, and subscription is available to
14 residential customers only. Page 14 of SBC's June 2005 Greater Kansas City White
15 Pages directory describes the service as follows:

16 If you're moving your service from one of the areas SBC Missouri
17 serves to another or if you're establishing service for the first time,
18 call your Service Center. We can smoothly transfer your service to
19 another SBC area, even if it's in another state, with no
20 interruptions in service or billing. One of our experienced service
21 representatives will help you select the phone service that's right
22 for you. Be sure to ask about Preferred Number Service. It's a
23 great way to automatically forward your calls to your new number
24 when you move, so you won't miss a single call and your callers
25 won't receive an impersonal, recorded message.

1 Preferred Number Service is available for mandatory MCA area customers who
2 move their service to an optional MCA area, such as occurred with Mr. Hammonds. In
3 order to obtain Preferred Number Service associated with a mandatory MCA number, a
4 customer does not have to have had service in a mandatory area before moving to an
5 optional MCA area. As set forth on sheet 118, Section 13, of SBC's P.S.C. Mo. Tariff
6 No. 35, the service is available for \$4.00 monthly and can be made available with a
7 unique ringing tone for an additional \$0.85. The unique ringing tone will allow the
8 Preferred Number Service subscriber to distinguish if the incoming call was placed by
9 dialing the subscriber's Preferred Number Service number, or the subscriber's current
10 residence local exchange telephone number. Preferred Number Service may result in a
11 toll charge if the incoming call is forwarded outside of the local calling scope.

12 **Q. Can Greenwood non-MCA customers (i.e., those with a 623 prefix)**
13 **call Mr. Hammonds' Lee's Summit 554 number as a local call?**

14 A. Yes. This line of questioning occurs on page 83 of the Greenwood public
15 hearing transcript. The question becomes: "Why does Mr. Hammonds need to subscribe
16 to a Greenwood 623 number if people can already call his Lee's Summit 554 number as a
17 local call?" The answer is because there is no outgoing service associated with
18 Mr. Hammonds' 554 Lee's Summit number. Mr. Hammonds would not be able to make
19 any outgoing calls if he did not subscribe to Greenwood telephone service. Preferred
20 Number Service is an incoming service only. The Lee's Summit Preferred Number
21 Service 554 telephone number is a software designated number only. There is no "line"
22 or other hardware associated with that number.

23 **Q. Please summarize the comments of Ms. Tammy Jones.**

1 A. Ms. Jones' statements concurred with other witnesses who testified that
2 her local service provider should be more informative about the long distance charges
3 associated with having a Greenwood 623 prefix. Ms. Jones is on a welcoming committee
4 and uses the phone frequently. Even though she uses electronic mail and cellular phones,
5 landline service is still essential. As with others, Ms. Jones testified to the growth in
6 Lee's Summit and stated that Lee's Summit residents in the Greenwood exchange should
7 be treated equally with the rest of Lee's Summit.

8 **Q. Would you summarize the testimony of Ms. Linda Kline?**
9

10 A. Ms. Kline started the petition to move the Greenwood exchange into the
11 MCA tier 2 and participated in the Calling Scope Task Force meetings in Jefferson City.
12 Ms. Kline expressed concern that her local service provider does not adequately explain
13 MCA and non-MCA options to callers. Ms. Kline also correctly pointed out that the
14 MCA calling scope is not applicable to pay telephones in any MCA area.

15 **Q. Mr. Voight, how many pay telephones are in SBC's Kansas City MCA**
16 **area?**

17 A. SBC has provisioned ** HC** pay telephones in SBC's mandatory
18 Kansas City MCA area, and ** HC** in SBC's optional Kansas City MCA areas. There
19 are ** HC---** "Customer-Owned" private pay telephones in SBC's mandatory Kansas
20 City MCA areas and ** HC** "Customer-Owned" private pay telephones in SBC's
21 optional Kansas City MCA areas.

22 **Q. What is the calling-scope of pay telephones in the MCA areas?**

1 A. The calling-scope for pay telephones in the MCA areas includes only the
2 exchange in which the pay phone is located, plus Extended Area Calling points, if any.

3 As stated on page 48 of the Commission's Report and Order in Case No. TO-92-
4 306: "These services [MCA, OCA, and COS] will not be made available to pay phones,
5 resellers, or aggregators. Pay phones, both LEC-owned and privately owned, will retain
6 the basic, nonoptional calling-scope for purposes of implementing the MCA
7 plan"....."SBC has offered to recommend a solution to the price and/or calling scope
8 issues for pay phones within the MCA by December 31, 1993."

9 **Q. What was SBC's recommendation?**

10 A. SBC submitted its "Pay Phone Recommendation for Metropolitan Calling
11 Scopes Area" on February 1, 1994. As stated in the Recommendation's Summary:

12 Although SWBT recognizes that customer confusion exists in
13 those exchanges with relatively high take rates for optional MCA
14 service, it is likely that much customer confusion concerning pay
15 phone pricing disparities will exist regardless of the calling scope
16 issue. Because implementation of MCA service has not at this time
17 generated customer complaints in the new MCA exchanges
18 regarding pay phone calling scopes, and in order to minimize
19 further revenue impacts on the affected companies, SWBT
20 recommends that the calling scopes for pay phones should be the
21 basic local calling scope in the exchanges where MCA is available
22 on an optional basis.²

23
24 **Q. Please summarize the testimony of Mr. Dennis Davis.**

25 A. Mr. Davis testified to having many years of telecommunications
26 experience. Mr. Davis testified that SBC uses the same central office switch to serve the

² Southwestern Bell Telephone Company's Pay Phone Recommendation for Metropolitan Calling Scopes Area. Case No. TO-92-306; February 1, 1994.

1 Greenwood exchange as it does the Lee's Summit exchange. Mr. Davis testified that the
2 same fiber distribution system serves both exchanges. Mr. Davis testified to the
3 importance of landline service to Digital Subscriber Line service. In response to
4 Commissioner questions, Mr. Davis opined that SBC's greatest cost in moving
5 Greenwood into tier two would be a loss of revenue, rather than any physical equipment
6 costs.

7 **Q. Does SBC use the same central office switch to serve the Greenwood**
8 **exchange as it does the Lee's Summit MCA zone?**

9 A. Yes.

10 **Q. Please summarize the testimony of Ms. Cathy Hopkins.**

11 A. As with previous witnesses, Ms. Hopkins testified to relocating her
12 residence into the Greenwood exchange and not being informed by her local service
13 provider about toll charges associated with the 623 prefix. Ms. Hopkins stated that she
14 would be hesitant to give up her landline phone because of safety concerns: specifically,
15 the inability to trace the location of wireless 911 callers.

16 **Q. Please summarize the testimony of Ms. Judy Warbeck.**

17 A. Ms. Warbeck was, at one time, a Hospice nurse who testified as to the
18 importance of the telephone network in her profession. Ms. Warbeck testified that, upon
19 moving into the Greenwood telephone exchange, she thoroughly questioned the
20 telephone company representative about the capabilities of the 623 prefix; however,
21 Ms. Warbeck was startled to find out that many people had to dial a "1" before calling
22 her 623 Greenwood number. Ms. Warbeck testified that the representatives with whom

1 she discussed calling scope matters were located in another part of the country.
2 Ms. Warbeck testified that her testimony was primarily about how unknown calling
3 scope restrictions affect Hospice patients and their families.

4 **Q. Please summarize the testimony of Greenwood mayor Kevin Adey.**

5 A. Mayor Adey estimated the current size of the city of Greenwood as
6 approximately 4,500 people. Mayor Adey stated that this population has exploded in
7 recent years. Mayor Adey spoke of his city's elderly population, and expressed concern
8 that elderly citizens have to pay an additional \$12.00 per month, or dial long distance to
9 call in prescriptions because the city of Greenwood does not have a pharmacy. In
10 response to Commissioner questions, Mayor Adey responded that it was also a long
11 distance call for other essential services for those who have a 623 prefix. Examples cited
12 were shopping for clothes, groceries, and auto repair. Mayor Adey also cited
13 professional services such as doctors, lawyers, and hospital services, as well as county
14 and state governmental offices. Mayor Adey expressed concerns that Digital Subscriber
15 Line service was not available to all areas of the city of Greenwood.

16 **Q. Would you comment on the Internet access statements made by**
17 **Mr. Gene Devaux (transcript, page 114)?**

18 A. Mr. Devaux testified that his profession requires use of Digital Subscriber
19 Line service. Mr. Devaux points to the benefits of "always on" Internet access because it
20 would be prohibitive to make a toll call to "dial up" an Internet connection. In
21 responding to Commissioner questions, Mr. Devaux stated that he subscribed to optional
22 MCA service in Greenwood. When asked if it would be long distance to dial up the

1 Internet, Mr. Devaux answered, “absolutely” because most of the Internet access numbers
2 are in Lee’s Summit.

3 **Q. Please explain why it would not be a toll call to “dial-up” an Internet**
4 **access number in Lee’s Summit for Greenwood customers who have a 623 prefix.**

5 A. Non-MCA 623 prefix Greenwood customers have mandatory Extended
6 Area Service to Lee’s Summit. The rate is \$0.10 per month for residential customers and
7 \$0.29 per month for business customers. The reason it is a toll call to the Lee’s Summit
8 R-7 School District and to Lee’s Summit government facilities is because those entities
9 subscribe to telephone service, called Integrated Services Digital Network, provisioned
10 out of the Kansas City South MCA zone. Greenwood does not have Extended Area
11 Service to the Kansas City South zone. Absent such extra-ordinary circumstances, all
12 calls from Greenwood to Lee’s Summit are local calls, including those to Internet service
13 providers.

14 **Q. Is there any correlation between Digital Subscriber Line (DSL)**
15 **Internet service and the calling-scope of MCA telephone service?**

16 A. No; none whatsoever.

17 **Q. What if a DSL customer uses Voice over Internet Protocol telephone**
18 **service (VoIP)? Is there any correlation in that instance to MCA telephone service?**

19 A. VoIP providers appear to offer a nation-wide calling scope. I’m not aware
20 of any correlation to MCA calling-scopes.

21 **Q. Would you summarize the testimony of Mr. Chris Jenkins?**

1 A. Mr. Jenkins works for the Jackson County Public Works. Mr. Jenkins
2 testified to being assigned a 623 prefix without knowledge of the associated toll charges
3 he would experience. Mr. Jenkins uses a cellular phone, but expresses the importance of
4 keeping a landline phone. Mr. Jenkins testified that the two are complimentary, and not
5 substitutable.

6 **Q. Would you summarize the testimony of Mr. Gary Embry?**

7 A. Mr. Embry testified to the growth occurring in the Lee's Summit area, and
8 expressed frustrations about the communications service he receives; lack of Digital
9 Subscriber Line and cable modem service is particularly noteworthy to Mr. Embry.
10 Mr. Embry also testified to having a 623 prefix number to which he connects to "dial-up"
11 Internet service, without having to pay long distance.

12 **Q. Would you summarize the testimony of Mr. John Warren?**

13 A. Mr. Warren lives in a part of Cass County which is also in the
14 Lee's Summit School District. Mr. Warren has a business in Lee's Summit for which he
15 subscribes to multi-line business telephone service. As with other witnesses, Mr. Warren
16 testified to that his cell phone was "unreliable" as a substitute for landline service. In
17 response to Commissioner questions, it was confirmed that Mr. Warren's home service
18 would be included in MCA tier 2 under the Office of Public Counsel's proposal, even
19 though Mr. Warren resides in Cass County. Lastly, Mr. Warren testified that to his
20 knowledge, he was the only person attending the Public Hearing from Lake Winnebago,
21 and opined that many more people would have attended the Public Hearing had they
22 known about it.

1 **Q. You have included in your testimony a summary of testimony**
2 **provided at the public hearing, but you have provided specific responses to only**
3 **some of that testimony. Why have you not provided specific responses to the other**
4 **public hearing testimony included in your testimony?**

5 A. My primary purpose in responding to some of the witnesses' testimony is
6 to describe technical clarification where I felt it might be helpful. Also, some of the
7 witnesses' testimony essentially reiterated that of previous witnesses' testimony.
8 Therefore, I merely summarized the witnesses' testimony because I felt responses in
9 those instances would be redundant. In either case, it is my opinion that the testimony
10 taken at the Greenwood Public Hearing supports the Staff's position not to oppose the
11 "Final Recommendation" as set forth by the Office of Public Counsel."

12 **Q. Does this conclude your Direct Testimony?**

13 A. Yes, it does.

William L. Voight

SUMMARY OF WORK EXPERIENCE

1974 – 1985 **United Telephone Company**, I began my telephone career on February 4, 1974, as a central office equipment installer with the North Electric Company of Gallion, Ohio. At that time, North Electric was the manufacturing company of the United Telephone System. My duties primarily included installation of all forms of central office equipment including power systems, trunking facilities, operator consoles, billing systems, Automatic Number Identification systems, various switching apparatuses such as line groups and group selectors, and stored program computer processors.

In 1976, I transferred from United's manufacturing company to one of United's local telephone company operations – the United Telephone Company of Indiana, Inc. I continued my career with United of Indiana until 1979, when I transferred to another United Telephone local operations company – the United Telephone Company of Missouri. From the period of 1976 until 1985, I was a central office technician with United and my primary duties included maintenance and repair of all forms of digital and electronic central office equipment, and programming of stored program computer processors. United Telephone Company is today known as Sprint Communications Corporation.

1985-1988 In 1985, I began employment with **Tel-Central Communications, Inc.**, which at that time was a Missouri-based interexchange telecommunications carrier with principal offices in Jefferson City, Missouri. As Tel-Central's Technical Services Supervisor, my primary duties included overall responsibility of network operations, service quality, and supervision of technical staff. Tel-Central was eventually merged with and into what is today WorldCom.

In conjunction with Tel-Central, I co-founded **Capital City Telecom**, a small business, "non-regulated" interconnection company located in Jefferson City. As a partner and co-founder of Capital City Telecom, I planned and directed its early start-up operations, and was responsible for obtaining financing, product development, marketing, and service quality. Although Capital City Telecom continues in operations, I have since divested my interest in the company.

1988-1994 In 1988, I began employment with **Octel Communications Corporation**, a Silicon Valley-based manufacturer of Voice Information Processing Systems. My primary responsibilities included hardware and software systems integration with a large variety of Private Branch eXchange (PBX), and central office switching systems. Clients included a large variety of national and international Local Telephone Companies, Cellular Companies and Fortune 500 Companies. Octel Communications Corporation is today owned by Lucent Technologies.

1994-Present **Missouri Public Service Commission**

William L. Voight

TESTIMONY EXPERIENCE

Case No. TR-96-28	In the Matter of Southwestern Bell's tariff sheets designed to increase Local and Toll Operator Service Rates.
Case No. TT-96-268	In the Matter of Southwestern Bell Telephone Company's tariffs to revise PSC Mo. No. 26, Long Distance Message Telecommunications Services Tariff to introduce Designated Number Optional Calling Plan.
Case No. TA-97-313	In the Matter of the Application of the City of Springfield, Missouri, through the Board of Public Utilities, for a Certificate of Service Authority to Provide Nonswitched Local Exchange and Intrastate Interexchange Telecommunications Services to the Public within the State of Missouri and for Competitive Classification.
Case No. TA-97-342	In the Matter of the Application of Max-Tel Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.
Case No. TA-96-345	In the Matter of the Application of TCG St. Louis for a Certificate of Public Convenience and Necessity to provide Basic Local Telecommunication Services in those portions of St. Louis LATA No. 520 served by Southwestern Bell Telephone Company.
Case No. TO-97-397	In the Matter of the Petition of Southwestern Bell Telephone Company for a Determination that it is Subject to Price Cap Regulation Under Section 392.245 RSMo. (1996).
Case No. TC-98-337	Staff of the Missouri Public Service Commission, Complainant, vs. Long Distance Services, Inc., Respondent.
Case No. TO-99-227	Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996.
Case No. TA-99-298	In the Matter of the Application of ALLTEL Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.

Case No. TO-99-596	In the Matter of the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri.
Case No. TO-99-483	In the Matter of an Investigation for the Purpose of Clarifying and Determining Certain Aspects Surrounding the Provisioning of Metropolitan Calling Area Service After the Passage and Implementation of the Telecommunications Act of 1996.
Case No. TO-01-391	In the Matter of a further investigation of the Metropolitan Calling Area Service after the passage and implementation of the Telecommunications Act of 1996.
Case No. TO-01-416	In the Matter of Petition of Fidelity Communications Services III, Inc. Requesting Arbitration of Interconnection Agreement Between Applicant and Southwestern Bell Telephone Company in the State of Missouri Pursuant to Section 252 (b)(1) of the Telecommunications Act of 1996.
Case No. TO-01-467	In the Matter of the Investigation of the State of Competition in the Exchanges of Southwestern Bell Telephone Company.
Case No. TT-02-129	In the Matter of AT&T Communications of the Southwest, Inc.'s Proposed Tariff to Establish a Monthly Instate Connection Fee and Surcharge.
Case No. TC-02-1076	Staff of the Missouri Public Service Commission, Complainant, vs. BPS Telephone Company, Respondent.
Case No. TK-04-0070	In the Matter of the Application of American Fiber Systems, Inc. for Approval of an Agreement with Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, Under the Telecommunications Act of 1996.
Case No. CO-2005-0066	In the Matter of the Confirmation of Adoption of an Interconnection Agreement with CenturyTel of Missouri, LLC d/b/a CenturyTel and Spectra Communications Group, LLC d/ba CenturyTel by Socket Telecom, LLC
Case No. TO-2003-0257	In the Matter of the Request from the Customers in the Rockaway Beach Exchange for an Expanded Calling Scope to Make Toll-Free Calls to Branson
Case No. IO-2006-0086	Application of Sprint Nextel Corporation for Approval of the Transfer of Control of Sprint Missouri, Inc., Sprint Long Distance, Inc. and Sprint Payphone Services, Inc. From Sprint Nextel Corporation to LTD Holding Company.