

Exhibit No.:

Issue(s):

Witness/Type of Exhibit:

Sponsoring Party:

Case No.:

MCA 2 Request
Meisenheimer/Direct
Public Counsel
TO-2005-0144

DIRECT TESTIMONY

OF

BARBARA A. MEISENHEIMER

Submitted on Behalf of the Office of the Public Counsel

GREENWOOD MCA CASE

CASE NO. TO-2005-0144

November 18, 2005

**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 BARBARA A. MEISENHEIMER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Barbara A. Meisenheimer, of lawful age and being first duly sworn, deposes and states:

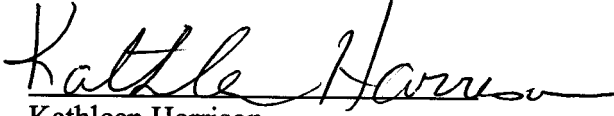
1. My name is Barbara A. Meisenheimer. I am Chief Utility Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony consisting of pages 1 through 18 and Schedules.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.



Barbara A. Meisenheimer

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

KATHLEEN HARRISON
Notary Public - State of Missouri
County of Cole
My Commission Expires Jan. 31, 2006



Kathleen Harrison
Notary Public

My Commission expires January 31, 2006.

Greenwood MCA Case

TO-2005-0144

**Direct Testimony
of
Barbara Meisenheimer**

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. Barbara A. Meisenheimer, Chief Utility Economist, Office of the Public Counsel,
P. O. 2230, Jefferson City, Missouri 65102. I am also an adjunct instructor for
William Woods University.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND EMPLOYMENT BACKGROUND.

A. I hold a Bachelor of Science degree in Mathematics from the University of
Missouri-Columbia (UMC) and have completed the comprehensive exams for a
Ph.D. in Economics from the same institution. My two fields of study are
Quantitative Economics and Industrial Organization. My outside field of study is
Statistics. I have taught economics courses for the University of Missouri-
Columbia, William Woods University, and Lincoln University, mathematics for
the University of Missouri-Columbia and statistics for William Woods University.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THIS COMMISSION?

1 A. Yes, I have testified on numerous issues before the Missouri Public Service
2 Commission. (PSC or Commission). I have testified on issues in the areas of
3 telecommunications, natural gas, water, electric and sewer. I have prepared and
4 supervised the preparation of cost of service studies on behalf of Public Counsel
5 for over eight years. These include class cost of service studies related to natural
6 gas, water and electric utilities and services cost studies related to
7 telecommunications carriers.

8 **Q. WHAT IS THE PURPOSE OF THIS CASE?**

9 A. In this case, the Commission will consider the Office of the Public Counsel's
10 motion requesting that the Commission modify the Kansas City Metropolitan
11 Calling Area (MCA) Plan to change the Greenwood exchange from an optional
12 Tier 3 exchange to a mandatory Tier 2 exchange.

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. To provide support for the request to modify the MCA to include the Greenwood
15 exchange in Tier 2 and to present the petitions filed by telephone customers in
16 Greenwood, Missouri and the Lee's Summit area to eliminate the Tier 3 charge of
17 \$12.35 for expanded calling from Greenwood to its community of interest.
18 (Schedule BAM Petitions 1-14)

19 **Q. BRIEFLY DESCRIBE THE HISTORY OF THIS REQUEST FOR EXPANDED CALLING.**

20 A. It is my understanding that the desire for expanded local calling between the
21 Greenwood telephone exchange (including Greenwood and the portions of the
22 Lee's Summit community) and the remainder of Lee's Summit and the rest of the

1 Kansas City Metropolitan Area has been a long standing issue for the citizens in
2 the area. The Greenwood exchange borders the mandatory MCA area known as
3 the Kansas City Metropolitan Area which includes the Principal Zone, Tier 1 and
4 Tier 2.¹ Much of the City of Lee's Summit is part of the Lee's Summit exchange
5 which is in Tier 2 or is served as a part of the Kansas City South exchange which
6 is in Tier 1. The Lee's Summit City services including city government, police
7 and fire and an area high school are actually served from the Tier 1, Kansas City
8 South exchange with central office codes 969, 986, and 765. (Schedule BAM
9 ADM NOs page 1, 2, 3) In the Lee's Summit Exchange, which is Tier 2, MCA is
10 mandatory and there is no additional charge above the \$12.07 residential basic
11 local rate or the \$38.50 single line business rate to participate in the MCA plan.
12 With MCA, residents in Tier 2 can call throughout the Principal Zone, Tier 1 and
13 Tier 2 and to MCA subscribers in Tiers 3, 4, and 5. This means that Lee's Summit
14 citizens located in the Lee's Summit exchange can call city government, police
15 and fire and an area high school as part of the mandatory MCA calling scope. It
16 is different for citizens of Lee's Summit that are located in the Greenwood
17 exchange. Greenwood is only an Optional Tier 3 exchange. In Greenwood,
18 single line residential customers generally must pay an extra \$12.35 fee in
19 addition to the \$8.79 basic local rate in order to participate in MCA.² Single line
20 business customers must generally pay \$24.80 in additional to their local basic

¹ See BAM SBC Tariff p. 3, 8.

² Greenwood residential customers pay an additional 10 cent adder for EAS calling with the Lee's Summit and Belton exchanges.

1 charge of \$22.30 in order to participate in MCA.³ (Schedule BAM SBC Tariff p.
2 10, 11) This means that customers with basic single line residential service in the
3 Tier 3 Greenwood exchange pay \$9.07 more per month $\{=(\$12.35 + \$8.79) -$
4 $\$12.07\}$ to have approximately the same calling scope as Tier 2 and to call the
5 same City of Lee's Summit services if they are Lee's Summit citizens. Business
6 customers with basic single line service in the Tier 3 Greenwood exchange pay
7 \$8.60 more per month $\{=(\$24.80+\$22.38) -\$38.50\}$ to have approximately the
8 same calling scope as Tier 2 and to call the same City of Lee's Summit services if
9 they are Lee's Summit citizens. Without subscribing to optional MCA, calls from
10 Greenwood to most of the Kansas City Metropolitan Area are toll calls. Likewise,
11 most of the Kansas City Metropolitan Area would incur toll charges to call the
12 Greenwood exchange.

13 As evidence by the testimony provided by residents at the public hearings
14 held in Greenwood on October 18, 2005, some of the residents of Lee's Summit
15 including those in the Raintree Subdivision must either pay the MCA Tier 3 adder
16 or incurred toll calls in order to call their city hall, alderman, fire department,
17 police department, and schools. Simply put, the people in the Greenwood
18 exchange area want to participate in the same toll free local calling as the rest of
19 Lee's Summit and with the same ability to call anywhere in the metropolitan area.
20 They feel that the MCA plan that requires them to pay more than similarly
21 situated customers discriminates against them without good cause. (Schedule
22 BAM SBC Tariffs, p. 1, 2)

³Greenwood single line business customers pay an additional 29 cent adder for EAS calling with the Lee's Summit and Belton exchanges.

1 **II. THE GREENWOOD EXCHANGE CUSTOMERS HAVE WAITED A**
2 **LONG TIME TO HAVE THEIR NEEDS ADDRESSED**

3 The Commission had established a number of cases that investigated the
4 MCA plan and expand local calling in light of the new competitive environment.
5 The Commission held hearings at various locations around the state to receive
6 testimony regarding the MCA plan. At the public hearings held in Lee's Summit,
7 a number of customers from Greenwood and Lee's Summit testified that they
8 wanted to be in the same MCA Tier and provided the reasons for that request.

9 Later, approximately 270 customers signed petitions and sent them to the
10 Office of Public Counsel. To accommodate the customers, the Public Counsel
11 filed the petitions of telephone customers in and around the Greenwood, Missouri
12 area for the modification of the monthly service fee for MCA service for NXXs
13 537 and 623 in Case TO-2001-391. A copy of the petitions containing
14 approximately 273 signatures of telephone customers is attached as Schedule
15 Petitions. On numerous occasions the Office of Public Counsel filed motions with
16 the Commission requesting that public hearings be held in Greenwood in order to
17 hear customer comments concerning their desire and need for expanded calling at
18 reasonable rates. These requests were usually opposed by the incumbent
19 company Southwestern Bell and by the Staff as being premature. The usual
20 reason for their opposition was that unless there was a very specific plan proposed
21 with rates and terms and conditions it would be pointless to have a public hearing
22 because the company and the Staff claimed that the people would say they want
23 something for nothing.

1 In TO-2001-391 the Commission established, an Industry Task Force to
2 consider issues surrounding MCA service in the St. Louis, Kansas City, and
3 Springfield metropolitan areas. The Commission instructed the Task Force to
4 investigate issues related to the pricing of MCA service and the effects of an
5 expanded MCA on pricing in addition to numbering issues related to MCA. The
6 Industry Task Force submitted its Final Report in 2002. No action resulted from
7 the case which expanded mandatory MCA calling beyond the existing areas.

8 Later, the Commission established case TW-2004-0471 in which a
9 taskforce was created to develop recommendations on MCA. As part of its
10 recommendation, the taskforce recommended that the PSC promulgate a rule and
11 implement a process to entertain requests for the establishment of new expanded
12 calling plans, or changes to existing expanded calling plans. The taskforce also
13 recommended that the requests for modification of the MCA or expanded local
14 calling that were already filed should be “grandfathered” and not be required to
15 start over the process recommended by the taskforce or by the Commission’s final
16 rule. The grandfathering included the Greenwood petitions.

17 Public Counsel again asked for local public hearing. The Commission
18 granted the request for a public hearing and a public hearing was held in
19 Greenwood on October 18, 2005.

20 **Q. DOES THE COMMISSION HAVE THE AUTHORITY TO MODIFY THE GREENWOOD**
21 **MANDATORY LOCAL CALLING SCOPE BY DESIGNATING IT AS AN MCA TIER 2**
22 **EXCHANGE?**

1 A. Yes. The Commission has the authority to determine the local calling scope.
2 Specifically, Section 386.020 defines the basic local calling scope as a matter that
3 is determined by the Commission.

4 (4) "Basic local telecommunications service", two-way switched
5 voice service within a local calling scope as determined by
6 the commission comprised of any of the following services
7 and their recurring and nonrecurring charges:
8

9 (a) Multiparty, single line, including installation, touchtone dialing,
10 and any applicable mileage or zone charges;
11

12 (b) Assistance programs for installation of, or access to, basic local
13 telecommunications services for qualifying economically
14 disadvantaged or disabled customers or both, including, but
15 not limited to, lifeline services and link-up Missouri services
16 for low-income customers or dual-party relay service for the
17 hearing impaired and speech impaired;
18

19 (c) Access to local emergency services including, but not limited to,
20 911 service established by local authorities;
21

22 (d) Access to basic local operator services;
23

24 (e) Access to basic local directory assistance;
25

26 (f) Standard intercept service;
27

28 (g) Equal access to interexchange carriers consistent with rules and
29 regulations of the Federal Communications Commission;
30

31 (h) One standard white pages directory listing.
32

33 Basic local telecommunications service does not include optional
34 toll-free calling outside a local calling scope but within a
35 community of interest, available for an additional monthly fee or
36 the offering or provision of basic local telecommunications service
37 at private shared-tenant service locations;
38

39 In addition, Section 392.200 (7) the commission shall have power
40 to provide the limits within which telecommunications messages
41 shall be delivered without extra charge

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Q. HOW SHOULD TIER 2 MCA SERVICE IN GREENWOOD BE PRICED?

A. Initially, the Commission should allow the same rate for the Greenwood exchange as Southwestern Bell charges other Tier 2 customers to participate in the MCA plan: \$12.07 for residential basic local service and \$38.50 for single line business service.

Q. HOW DOES THE COMPETITIVE CLASSIFICATION OF THE GREENWOOD EXCHANGE AFFECT THE RATES FOR TIER 2 MCA SERVICE?

Section 245.5.5 (6) RSMo. allows the Company to file tariffs that would alter the MCA rate.

(6) Upon request of an incumbent local exchange telecommunications company seeking competitive classification of business service or residential service, or both, the commission shall, within thirty days of the request, determine whether the requisite number of entities are providing basic local telecommunications service to business or residential customers, or both, in an exchange and if so shall approve tariffs designating all such business or residential services other than exchange access service, as competitive within such exchange. Notwithstanding any other provision of this subsection, any incumbent local exchange company may petition the commission for competitive classification within an exchange based on competition from any entity providing local voice service in whole or in part by using its own telecommunications facilities or other facilities or the telecommunications facilities or other facilities of a third party, including those of the incumbent local exchange company as well as providers that rely on an unaffiliated third- party Internet service. The commission shall approve such petition within sixty days unless it finds that such competitive classification is contrary to the public interest. The commission shall maintain records of regulated providers of local voice service, including those regulated providers who provide local voice service over their own facilities, or through the use of facilities of another provider of local voice service. In reviewing an incumbent local exchange telephone

1 company's request for competitive status in an exchange, the
2 commission shall consider their own records concerning
3 ownership of facilities and shall make all inquiries as are
4 necessary and appropriate from regulated providers of local
5 voice service to determine the extent and presence of
6 regulated local voice providers in an exchange. **If the services**
7 **of an incumbent local exchange telecommunications**
8 **company are classified as competitive under this**
9 **subsection, the local exchange telecommunications**
10 **company may thereafter adjust its rates for such**
11 **competitive services upward or downward as it**
12 **determines appropriate in its competitive environment,**
13 **upon filing tariffs which shall become effective within the**
14 **time lines identified in section 392.500.** The commission
15 shall, at least every two years, or where an incumbent local
16 exchange telecommunications company increases rates for
17 basic local telecommunications services in an exchange
18 classified as competitive, review those exchanges where an
19 incumbent local exchange carrier's services have been
20 classified as competitive, to determine if the conditions of this
21 subsection for competitive classification continue to exist in
22 the exchange and if the commission determines, after hearing,
23 that such conditions no longer exist for the incumbent local
24 exchange telecommunications company in such exchange, it
25 shall reimpose upon the incumbent local exchange
26 telecommunications company, in such exchange, the
27 provisions of paragraph (c) of subdivision (2) of subsection 4
28 of section 392.200 and the maximum allowable prices
29 established by the provisions of subsections 4 and 11 of this
30 section, and, in any such case, the maximum allowable prices
31 established for the telecommunications services of such
32 incumbent local exchange telecommunications company shall
33 reflect all index adjustments which were or could have been
34 filed from all preceding years since the company's maximum
35 allowable prices were first adjusted pursuant to subsection 4
36 or 11 of this section.

- 37 6. Nothing in this section shall be interpreted to alter the
38 commission's jurisdiction over quality and conditions of
39 service or to relieve telecommunications companies from the
40 obligation to comply with commission rules relating to
41 minimum basic local and interexchange telecommunications
42 service.
43

1 **Q. WHAT IS YOUR UNDERSTANDING OF THE FACTORS THE COMMISSION NEEDS TO**
2 **CONSIDER IN DECIDING THIS CASE?**

3 A. As in all the cases, the Commission should consider all relevant factors.
4 Generally, it should look to Section 392.185, RSMo for overall guidance. The
5 Commission should weigh the evidence and make its decision in keeping with the
6 advancement of these legislative purposes and objectives.

7 Section 393.185 The provisions of this chapter shall be construed to:

8 (1) Promote universally available and widely affordable
9 telecommunications services;

10 (2) Maintain and advance the efficiency and availability of
11 telecommunications services;

12 (3) Promote diversity in the supply of telecommunications services and
13 products throughout the state of Missouri;

14 (4) Ensure that customers pay only reasonable charges for
15 telecommunications service;

16 (5) Permit flexible regulation of competitive telecommunications
17 companies and competitive telecommunications services;

18 (6) Allow full and fair competition to function as a substitute for
19 regulation when consistent with the protection of ratepayers and otherwise
20 consistent with the public interest;

21 (7) Promote parity of urban and rural telecommunications services;

22 (8) Promote economic, educational, health care and cultural
23 enhancements; and

1 (9) Protect consumer privacy.

2
3 Specific to expanded calling, the Commission's new rule 4 CSR 240-2.061 (15)
4 (effective October 30, 2005) states: "The commission, in its findings, will
5 determine whether the proposed calling plan is just, reasonable, affordable, and in
6 the public interest. In making these determinations, the commission will consider
7 evidence on the competitive alternatives available, competitive implications,
8 revenue impacts, and company and social costs of implementing the proposed
9 expanded calling plans balanced against the objectives of the community of
10 interest. The commission will also weigh any costs against benefits to the
11 community of interest when making its determination."

12 **THE PROPOSED MCA MODIFICATION PLAN**

13 **Q. PLEASE IDENTIFY AND DESCRIBE THE PROPOSED EXPANDED LOCAL**
14
15 **CALLING AREA PLAN.**

16
17 **A** The Kansas City MCA is modified to include the Greenwood exchange as a Tier
18 2 mandatory exchange rather than an optional Tier 3.

19 **COMMUNITY OF INTEREST**

20
21 **Q. PLEASE EXPLAIN HOW THE PROPOSED PLAN WILL SATISFY THE OBJECTIVES OF**
22
23 **THE COMMUNITY OF INTEREST.**

24
25 **A** Customers in the Greenwood exchange have regulated that the Commission to
26 treat them in the same as the customers in the Lee's Summit exchange, a Tier 2
27 mandatory exchange. This would not only permit local calling from the
28 Greenwood exchange that includes part of the City of Lee's Summit, to the rest of

1 the city and Greenwood's greater community of interest. As the testimony at the
2 public hearing indicated, the Greenwood exchange shares a specific community
3 of interest with not only the Lee's Summit exchange, but also with the South
4 Kansas City exchange. Portions of the City of Lee's Summit are located in each
5 of the exchanges. Raintree is a residential development of single family homes
6 and multi-family residences, in the portion of Lee's Summit in the Greenwood
7 exchange. The City of Lee's Summit city administrative offices and key public
8 safety services for the Lee's Summit city are located in the South Kansas City
9 exchange.

10 Schools attended by residents of the Greenwood exchange are located in
11 the Lee's Summit and South Kansas City exchanges. The children of residents in
12 the Greenwood exchange and Lee's Summit exchange attend the same schools
13 and generally interact as one community through school activities and events. The
14 Greenwood exchange looks to the Lee's Summit exchange as the location of
15 hospital and medical services, for the basic retail establishments, including
16 grocery stores, automobile dealers and repair shops.

17 The exchanges of Lee's Summit and South Kansas City and Greenwood
18 have common interests and constitute a community of interest. The MCA already
19 recognized the community of interest between the South Kansas City exchange
20 and the Lee's Summit exchange since both are mandatory MCA exchanges where
21 the MCA rate is included in the local basic rate for the exchanges and are not
22 subject to an additional charge. They share the same local calling scope since calls
23 between the exchanges are seven digit local dialed calls not subject to an

1 additional charge or toll. The exchanges are also part of the larger MCA scope
2 that allows two way local calling with seven digit dialing and no per minute toll
3 charges and without an additional fee within the MCA tiers under the
4 Commission's plan provisions.

5 The placement of Greenwood in Tier 2 will result in recognition of this
6 community of interest and will allow customers in that exchange to have equal
7 treatment with members of the same community of interest and it will end the
8 present discriminatory treatment of these customers.

9
10 **Q. PLEASE IDENTIFY AND DESCRIBE THE PROPOSED PRICE AND TERMS OF THE**
11 **PLAN.**

12
13
14 **A** Because of the strong indication at the public hearing that the customers in both
15 the Greenwood and Lee's Summit should be treated the same because of the
16 common community of interest, it is not only logical, but just and reasonable for
17 both exchanges to have telephone service under the same price and conditions.
18 Therefore, Public Counsel proposes that local basic service in Greenwood be
19 initiated after modification of the MCA plan at the prevailing MCA rate: \$12.07
20 for residential and \$38.50 for business, with the MCA charge included in that rate.
21 This would be an increase in the present \$8.79 residential and \$22.30 business
22 local service rate now paid by Greenwood customers. The separate fee for
23 optional MCA service of \$12.35 residential and \$24.80 business will no longer
24 apply. All customers in Greenwood would now pay the Tier 2 local basic rate
25 that includes MCA service.

26

1 **Q. PLEASE STATE WHETHER THE PROPOSED PLAN WILL BE OPTIONAL OR**
2
3 **MANDATORY FOR ALL CUSTOMERS IN THE EXPANDED LOCAL CALLING SCOPES.**

4
5 A All customers in the Greenwood exchange would be mandatory participants in the
6
7 MCA plan and will pay the same rates as other Tier 2 exchanges and be treated
8
9 the same. At present the take rate for MCA service is extremely high.

10
11 **Q. PLEASE IDENTIFY THE TOLL OR LOCAL CLASSIFICATION OF THE CALLING PLAN**
12
13 **TRAFFIC AND THE PROPOSED ASSOCIATED INTER-COMPANY COMPENSATION TO**
14
15 **FACILITATE THE PLAN.**

16
17 A This compensation will be bill and keep the same as compensation for all Tier 2
18
19 calling and subject to the provisions for intercompany compensation for MCA
20
21 traffic.

22
23 **Q. HOW IS THE PROPOSED CALLING PLAN IN THE PUBLIC INTEREST?**

24 A This modification of the MCA addresses a long delayed and ignored customer
25
26 demand for reasonably priced and adequate local telephone service in the
27
28 Greenwood and Lee's Summit area. The City of Lee's Summit has passed
29
30 resolutions as recent as 2002 asking for such a modification. It is clear that the
31
32 Cities of Lee's Summit and Greenwood see the continuation of the status quo as a
33
34 detriment to their communities and to the health, safety, and general wellbeing of
the residents. Public Counsel has tried to obtain a forum for the residents to
express their views on this plan. At the public hearing on October 18, 2005, the
school auditorium was filled with vocal and concerned customers who made it
clear that they still want this local calling modification, notwithstanding the
passage of time and the availability of alternative technology. The competitive

1 market has not responded to the customer's needs as testified to at the public
2 hearing.

3 **Q. HOW IS THE PROPOSED CALLING PLAN JUST AND REASONABLE?**

4 A It treats the customers in the same community of interest the same by recognizing
5 that community of interest and charging them the same local basic rate without a
6 separate charge for MCA service. Even though the new basic local rate will
7 increase from the basic rate now paid by Greenwood customers, the increase to
8 the same level as Tier 2 exchanges would be consistent with the MCA pricing
9 scheme and would reflect the broader local calling scope for all customers. It is
10 reasonable that customers in similarly situated circumstances be treated on the
11 same level.

12 **Q. HOW IS THE PROPOSED CALLING PLAN AFFORDABLE?**

13 A The rate charged for Tier 2 MCA service was established when the Commission
14 established the plan in *In The Matter Of The Establishment Of A Plan For*
15 *Expanded Calling Scopes In Metropolitan And Outstate Exchanges*, TO-92-306
16 (December 23, 1992) and was determined at that time to be just, reasonable, and
17 affordable and in the public interest. The rates were affirmed after local
18 competition began in *In The Matter Of An Investigation For The Purpose Of*
19 *Clarifying And Determining Certain Aspects Surrounding The Provisioning Of*
20 *Metropolitan Calling Area Service After The Passage And Implementation Of The*
21 *Telecommunications Act Of 1996* (Case No. TO-99-483) September 7, 2000.
22 There was no testimony at the public hearing that paying the same rate for local

1 service including MCA service as the Lee's Summit exchange would not be
2 affordable.

3 **Q. WHAT ARE THE COMPETITIVE ALTERNATIVES?**

4 **A** While the customers could use wireless service to avoid local toll charges and the
5 separate MCA fee, the sentiment at the public hearing was that the customers did
6 not consider that option to be a suitable alternative in many cases. One customer
7 testified that his cell phone was a supplement, not a substitute for his regular
8 phone service. Cellular service does not address many callback needs.

9 **ANALYSIS AND CONCLUSION**

10 **Q. BASED UPON THE THESE FACTORS, HOW WOULD YOU BALANCE AND WEIGH THE**
11 **COSTS OF THE PLAN AS COMPARED TO THE BENEFITS OF THE PLAN AND TO THE**
12 **OBJECTIVES OF THE COMMUNITY OF INTEREST OF THE PLAN?**

13 **A** Since SBC has received competitive classification for both residential and
14 business services in Greenwood, it can make its own decision if and how it wants
15 to recover any revenue loss it perceives it will have with the modification of the
16 MCA as proposed. The benefits to the community and the customers were
17 strongly stated at the public hearing. The public interest and the community of
18 interest of these areas will be served and advanced by placing Greenwood in Tier
19 2.

20 **Q. DO YOU HAVE CONCERNS THAT GREENWOOD CUSTOMERS ARE NOT RECEIVING**
21 **TOLL FREE CALLING WITH THE BELTON AND LEE'S SUMMIT EXCHANGES THAT**
22 **THEY PAY FOR THROUGH AN EAS CHARGE.**

1 A. Yes. At the public hearing in Greenwood, Mr. Barton Reese described
2 a situation in which he was not able to call NXX in exchanges that
3 according to SBC tariffs are toll free EAS calls.

4
5 MR. REESE: "I live in Greenwood. I had a
6 623 phone number. When I got it I could only call
7 623 and 537 numbers. I knew that was wrong, so I
8 called Southwestern Bell and they did something that
9 allowed me to call several prefixes -- or excuse me,
10 exchanges in Lee's Summit. So I was able to call
11 toll free several exchanges in Lee's Summit, and 623
12 and 537".

13
14 **Q. IN ADDITION TO THE MODIFICATIONS OF THE MCA TIER 2 TO INCLUDE**
15 **GREENWOOD, DOES OPC HAVE ANY OTHER RECOMMENDATIONS WHICH WILL**
16 **PROVIDE SOME MEASURE OF RELIEF FOR THE CUSTOMERS IN THE GREENWOOD**
17 **EXCHANGE?**

18 A. In the event that the Commission rejects the citizens petitions for full
19 relief, then Public Counsel suggest that at the minimum the Commission should
20 include the Kansas City South exchange area as an EAS area. All calls from
21 Greenwood exchange to Kansas City South including appropriate ILEC, CLEC,
22 and wireless callers will be treated as a local call. (See Schedule BAM Exchange
23 page 1 for ILEC code) This would address some of the customer's needs and
24 desire for local calling to City of Lee's Summit services, including city
25 government, police, fire and schools, as mentioned at the local public hearing.
26 This would be a mandatory EAS route with two way local calling between those
27 exchanges. The EAS charge the Commission should establish is \$0.10 for

1 residential and \$0.26 for business, the same as in the Greenwood/Lee's
2 Summit/Belton EAS routes.

3 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4 **A. Yes.**

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