

**Schedule 1 – BAM Rebuttal**  
**contains information that has been**  
**deemed Highly Confidential.**

## **Data Request No. 8**

Please identify by name, amount and purpose all minimum usage charges on an AT&T residential long distance customer's bill that would result in the application of the ISCF.

**RESPONSE:** Subject to AT&T's Objections served on June 20, 2005, AT&T provides the following response:

AT&T objects to the mischaracterization of minimum usage charges as resulting "in the application of the ISCF." The ISCF is assessed on customer bills whenever customers are not specifically exempt from the charge (e.g., the customer subscribes to AT&T local service or to AT&T One Rate Simple) and the customer incurs billable charges of \$0.01 or more. Billable charges include any charge related to the calling plan(s) to which the customer subscribes, including monthly recurring charges or minimum monthly usage charges. All consumer services minimum monthly usage charges, when applicable, are called "Minimum Monthly Usage Charge." The Minimum Monthly Usage Charge varies by service and for most services where applicable ranges from \$7.00 to \$9.00 per month. AT&T also offers two international bundled calling plans with higher Minimum Monthly Usage Charges. See attached current description of the Minimum Monthly Usage Charge dated March 1, 2005 from the AT&T Service Guide Bates-numbered ATT-8 to ATT-9.



**Display Category: Miscellaneous Charges, Credits and Taxes**  
**Specific Offer: Minimum Monthly Usage Charge**

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UID: MCT01003MC

**Description**

The Minimum Monthly Usage Charge is applied when you subscribe to only certain Direct Dialed Station state-to-state calling plans and your total monthly charges are less than the Minimum Monthly Usage Charge requirement.

**Terms and Conditions**

"You" and "Your" mean current or potential customers of AT&T. You must be classified as a residential customer of your Local Telephone Company.

AT&T means AT&T Corp. and any AT&T affiliates authorized to provide you with AT&T services.

**1. This charge is assessed when you:**

- Currently have, or choose AT&T as your Primary Long Distance Carrier.
- Subscribe to only certain direct dialed station state-to-state calling plans as noted in those service guides.

**2. AT&T will apply this charge monthly based on the following:**

- Your total AT&T state-to-state, in-state, and international charges for a monthly billing period are less than the Minimum Monthly Usage Charge.
- Total monthly charges exclude Universal Connectivity Charge, State Carrier Line Charge, Single Bill Fee, Payphone Surcharge, taxes, and charges billed to your AT&T Calling Card not associated with your main residential telephone account.

**3. AT&T will not apply this charge based on one or more of the following:**

- Your total AT&T state-to-state, in-state, and international charges for a monthly billing period are greater than the Minimum Monthly Usage Charge.
- You subscribe to AT&T for your Local Service and have a combined AT&T local and AT&T long distance service bill.
- You are located in a non-equal access territory.
- You qualify as a "low income" subscriber, defined as one who meets the eligibility requirements of a low income plan (for example, Lifeline, Link-Up, etc.,) offered by

*AT&T Service Guides are subject to and part of the AT&T Consumer Services Agreement and may be changed and/or discontinued by AT&T.*



your Local Telephone Company, and notify AT&T prior to March 1, 2004 of your eligibility and provide the AT&T required certification of eligibility to AT&T.

- You are enrolled in an AT&T free minute promotion for those months that the free minute credit is applied.
- You are enrolled in an AT&T promotional offer for those months in which an applicable Monthly Recurring Charge has been waived.
- You subscribe to AT&T wireless service where your AT&T wireless service is billed to the same main residential telephone account as your AT&T long distance service.

### **Rates and Charges**

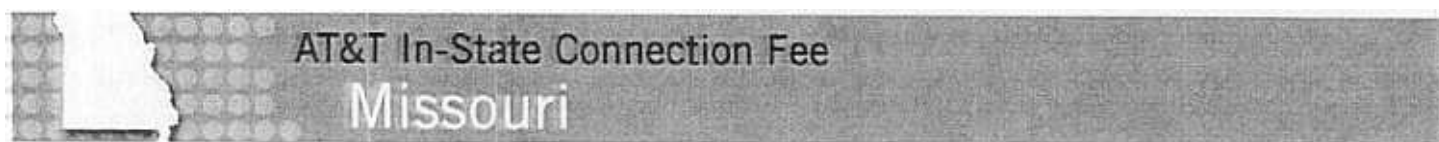
- A Minimum Monthly Usage Charge of \$9.00 applies each month with bills issued on or after March 1, 2005.
- The Minimum Monthly Usage Charge is in lieu of your total interstate, in-state, and international charges (excluding Universal Connectivity Charge, State Carrier Line Charge, Single Bill Fee, Payphone Surcharge, Regulatory Assessment Fee, and taxes) when your total charges are less than the Minimum Monthly Usage Charge.



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**AT&T In-State  
Connection Fee Home**

**Missouri Home**

**Missouri FAQs**

Your local telephone company charges AT&T for carrying your in-state local toll and long distance calls over its lines. The local telephone companies' charges to carry these calls in Missouri are higher than those charged for state-to-state calls. As a result, AT&T includes in your monthly bill a \$2.49 In-State Connection Fee. The fee applies to Customers subscribed to AT&T for residential long distance or local toll service. The fee does not apply to customer of AT&T Local Service, where applicable.

[Terms & Conditions](#) | [Privacy Policy](#) | [Contact Us](#)

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INTERCITY TELECOMMUNICATIONS SERVICES

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4. SERVICE AND RATE DESCRIPTION (Continued)

.28 SPRINT VOICE COMMAND<sup>SM</sup> For Your Home Phone

1 Description

SPRINT VOICE COMMAND<sup>SM</sup> For Your Home Phone is a voice activated dialing application which provides consumers a web based solution for voice dialing contacts and accessing and storing a personal address book. Customers must be presubscribed to Sprint Long Distance Service.

To access this service, a customer must first dial an access code. After accessing the service, customers can place these calls by speaking the number or destination/name from the customer's personal directory. The system will repeat the number or name/destination to the customer, for confirmation, and will then place the call to the selected destination.

.2 Use of Service

Once the customer says a number, name or destination, the system will activate and dial the appropriate telephone number. This service is only available where technically feasible. See Section 6.20.1 for applicable rates.

.29 In-State Access Recovery Charge

Services provided pursuant to this tariff are subject to an In-State Access Recovery charge. The In-State Access Recovery charge will be assessed monthly on Dial 1 Sprint accounts for which local service is not provided by a Sprint company. This charge is applied if a customer has Sprint long distance billable charges and credits on their bill, including, but not limited to, monthly recurring charges or minimum usage charges. Customers who subscribe to Sprint 40 Cents Anytime Anywhere will be excluded from this charge. This charge does not contribute toward any applicable minimum monthly charge. This charge is based on access fees that Sprint pays to local phone companies. See Section 6.21.1 for the applicable charge.

(T)  
(N)  
|  
(N)

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**ISSUED:**  
01-30-04

Margaret Prendergast  
Senior Manager -Tariffs  
6450 Sprint Parkway  
Overland Park, Kansas 66251

**EFFECTIVE:**  
03-01-04

**PUBLIC COUNSEL DATA REQUEST TO SPRINT**  
**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.**  
**MCI WORLDCOM COMMUNICATIONS, INC.**  
**TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY**  
**SPRINT COMMUNICATIONS COMPANY, L.P.**  
**CASE NO. TT-2002-129, et al**

REQUESTED FROM: James A. Appleby, Sprint  
Brett D. Leopold

DATE REQUESTED: June 9, 2005

**INFORMATION REQUESTED:**

With respect to Ex. JAA #3 and #4:

1. Please identify and explain how the average access cost per minute was calculated for Missouri intrastate, Missouri interstate and National intrastate for both December 2004 and July 2002. Include the access rates used, the source of these rates, what statistical measure of "average" was employed or reported.
2. Identify and provide a copy of any memoranda, report, study, analysis that the witness used in preparation of his direct testimony and in particular in preparation of Ex. JAA #3 and Ex. JAA #4.
3. With respect to Ex. JAA #4: Please identify and explain how the average Intrastate Access Cost Differential Per Residential Customer between Missouri and National Interstate was calculated, including the access rate, the number of customers used and the source of that data, what statistical measure of "average" was employed and reported as the results in JAA#4.
4. Please provide justification for the Highly Confidential classification of Ex. JAA#3 and JAA#4.

REQUESTED BY: Michael F. Dandino

**INFORMATION PROVIDED:**

**Sprint Response:**

1. Sprint maintains a database of switched access rates by rate element, by jurisdiction, by provider, by state and by direction of the traffic (originating and terminating). This database also contains the number of access minutes by jurisdiction, by provider, by state and by direction. With this information it is possible to calculate an access price times minute of use quantity to determine the average minute of use cost. In addition to the minute of use elements, some jurisdictions, such as the interstate jurisdiction, have fixed charges for transport based on the capacity of the facility the provider ordered. These total costs are added to the per minute charges by dividing that total transport facility cost in that jurisdiction by the access minutes of use for that same jurisdiction (Example: interstate fixed transport costs divided by interstate access minutes).
2. The attached Highly Confidential information is the data from the internal database discussed in Sprint's response, above, for the months of July 2002 and December 2004. This is the information utilized in preparation of Highly Confidential Exhibits JAA #3 and #4 in Sprint's pre-filed, direct testimony in this case.
3. The Average Intrastate Access Cost Differential per Residential Customer was calculated by first multiplying the Average Intrastate Access Rate for Missouri (as shown in Sprint's pre-filed testimony in the Highly Confidential Exhibit JAA #3) by the National Average Intrastate Access Minutes per Month per Residential Customer to calculate the Missouri Average Intrastate Access Cost per Residential Customer. Second, the National Average Intrastate Access Cost per Residential Customer was calculated by multiplying the National Average Intrastate Access Rate by the National Average Intrastate Access Minutes per Month per Residential Customer. The difference between these two results is the Average Intrastate Access Cost Differential per Residential Customer. Data underlying these calculations is included in the attached Highly Confidential data.
4. Sprint's internal, state-specific cost information and its access minutes of use volumes by classes of customers and other, third party carriers is considered highly sensitive, commercial information that could be used by competitors to Sprint's detriment in the highly competitive toll market. These costs are critical to Sprint in assuring that its service offerings are competitive in the marketplace. As such it fits the MoPSC's definition of Highly Confidential information.



**ATTACHMENT**

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: 6/29/05

SIGNED BY: James A. Ophely

TITLE: Regulatory Affairs Manager

**PUBLIC COUNSEL DATA REQUEST TO SPRINT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

REQUESTED FROM: James A. Appleby, Sprint  
Brett D. Leopold

DATE REQUESTED: June 9, 2005

**INFORMATION REQUESTED:**

Please identify whether there is any difference in the switched access charges for a residential customer and a business customer for an instate toll call between the same two points. If there is, please state the amount of the difference.

REQUESTED BY: Michael F. Dandino

**INFORMATION PROVIDED:**

**Sprint Response:**

If the call's length of time is also the same, Sprint does not believe there are material differences between a call placed by a residential customer and a business customer, assuming also that the call is between the same two points. The type or class of retail customers placing calls does not impact the wholesale access service costs.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: 6/29/05

SIGNED BY: James A. Appleby

TITLE: Regulatory Affairs Manager

No. 10

**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

**REQUESTED FROM:** Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

**DATE REQUESTED:** June 9, 2005

**INFORMATION REQUESTED:**

Please identify by name, amount and purpose all minimum usage charges on an MCI and Teleconnect residential long distance customer's bill that would result in the application of the ISAR.

**REQUESTED BY:** Michael F. Dandino

**INFORMATION PROVIDED:**

Customers will be exempt from this charge during any monthly billing period where their gross usage is less than \$1.00. Minimum charges and plan fees without gross usage do not trigger the charge. The following service types can contribute to gross usage:

- Dial-1 Interstate;
- Dial-1 Intralata;
- Dial-1 Intrastate;
- Dial-1 International;
- Dial-1 Interstate - Operator Services;
- Dial-1 Intralata - Operator Services;
- Dial-1 Intrastate - Operator Services;
- Dial-1 International - Operator Services;
- Card Interstate;
- Card Intralata;
- Card Intrastate;
- Card International;
- Card Interstate - Operator Services;
- Card Intralata - Operator Services;
- Card Intrastate - Operator Services;

Card International - Operator Services;  
Card Comp Interstate;  
Card Comp Intralata;  
Card Comp Intrastate;  
Card Comp International;  
18C Card International;  
18C Interstate;  
18C International;  
P800 Intralata;  
P800 Interstate;  
P800 International;  
P800 Intrastate;

**Schedule 8 – BAM Rebuttal**  
**contains information that has been**  
**deemed Highly Confidential.**

No. 18

**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

**REQUESTED FROM:** Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

**DATE REQUESTED:** June 9, 2005

**INFORMATION REQUESTED:**

Please identify the criteria MCI and Teleconnect used to assess the ISAR to residential customers and not to business customers. If this criteria has been reduced to writing in a memoranda, report, study or email, please provide a copy.

**REQUESTED BY:** Michael F. Dandino

**INFORMATION PROVIDED:**

Pricing decisions are based on both what the specific state costs can support as well as the rates of our competitors and what the markets can support. For these reasons, MCI and Teleconnect decided not to assess the charge to business customers. For the same factors, MCI and Teleconnect decided not to fully recover the incremental instate access costs of our residential customers, where MCI and Teleconnect can support a charge of over \$16.00 per customer per month. For additional information see the direct testimony of Andrew Graves filed in this proceeding and responses to other data requests.

**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

REQUESTED FROM: Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

DATE REQUESTED: June 9, 2005

**INFORMATION REQUESTED:**

If the purpose of the ISAR is to recover "excessive" switched access costs, explain why all subscriber/customers who cause MCI and Teleconnect to incur switched access charges do not share in that cost recovery.

REQUESTED BY: Michael F. Dandino

**INFORMATION PROVIDED:**

See response to Question 18

**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

**REQUESTED FROM:** Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

**DATE REQUESTED:** June 9, 2005

**INFORMATION REQUESTED:**

Please identify whether there is any difference in the switched access charges for a residential customer and a business customer for an instate toll call between the same two points. If there is, please state the amount of the difference.

**REQUESTED BY:** Michael F. Dandino

**INFORMATION PROVIDED:**

Residential and business customers do not pay access charges. The rates incurred by the interexchange provider are the same regardless of whether the end user is a residential or business customer. Total charges will vary based on the amount of the customer's usage.



**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

REQUESTED FROM: Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

DATE REQUESTED: June 9, 2005

**INFORMATION REQUESTED:**

Please identify all ILECs and CLECs in Missouri which MCI and Teleconnect claims to have "excessive intrastate switched access charges" and the rates at which MCI and Teleconnect would consider as not excessive.

REQUESTED BY: Michael F. Dandino

**INFORMATION PROVIDED:**

Subject to prior objections, MCI and Teleconnect have provided information regarding access charges in the direct testimony of Andrew Graves. MCI and Teleconnect regard access charges above interstate rates to be excessive.

No. 20

**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

**REQUESTED FROM:** Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

**DATE REQUESTED:** June 9, 2005

**INFORMATION REQUESTED:**

Please identify the reduction in switched access rate necessary in Missouri for MCI and Teleconnect to (1) reduce the amount of the ISAR, (2) reduce the ISAR by 50% or more, and (3) to eliminate the ISAR.

**REQUESTED BY:** Michael F. Dandino

**INFORMATION PROVIDED:**

MCI and Teleconnect will eliminate what OPC calls the ISAR if intrastate access rates are reduced to parity with interstate rates. No other decision has been made along the lines requested.

No. 17

**PUBLIC COUNSEL DATA REQUEST TO MCI AND TELECONNECT**

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
MCI WORLDCOM COMMUNICATIONS, INC.  
TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY  
SPRINT COMMUNICATIONS COMPANY, L.P.  
CASE NO. TT-2002-129, et al**

**REQUESTED FROM:** Andrew J. Graves, MCI and Teleconnect  
Carl J. Lumley

**DATE REQUESTED:** June 9, 2005

**INFORMATION REQUESTED:**

Did MCI and Teleconnect make any adjustment in its ISAR charge as a result of any change in switched access rates in Missouri since it was established in 2001?

**REQUESTED BY:** Michael F. Dandino

**INFORMATION PROVIDED:**

MCI and Teleconnect did not adjust what OPC calls the ISAR as a result of changes in switched access rates, but did increase it in 2004 in part because of the inadequacy of reductions in switched access rates.

# Examples of Customer Impacts

AT&T, MCI/Teleconnect and Sprint Billing Practices Can Cause Customers With No Instate Calling To Pay The Fee				
	Instate	Minutes Of Use Card Interstate	Card International	Charged an Instate Access Fee?
Customer A	210	0	0	Yes
Customer B	250	0	0	Yes
Customer C	0	60	0	Yes
Customer D	0	0	60	Yes

Flat Fees Can Cause Rate Discrimination In Instate Rates (*This is true for the AT&T, Sprint and MCI/Teleconnect fees.)				
	Instate Minutes Of Use	Example- AT&T One Rate @ 7cents per minute*	Plus Instate Access Fee	Total Cost
Customer A	145	\$ 10.15	2.49 \$	12.64 \$
Customer B	250	\$ 17.50	2.49 \$	19.99 \$
				Actual Cost per minute
				0.08717
				0.07996

Exemption Based On Local Subscription Causes Instate Rate Discrimination (*This is true for the AT&T, Sprint and MCI/Teleconnect fees.				
	Instate Minutes Of Use	Example- SprintSense AnyTime @ 12 cents per minute*	Plus Instate Access Fee	Total Cost
Customer A (Sprint Local)	100	\$ 12.00	0 \$	12.00 \$
Customer B (Not Sprint Local)	100	\$ 12.00	1.99 \$	13.99 \$
				Actual Cost per minute
				0.12000
				0.13990