

**Exhibit No.:**

**Issue(s):**

**Witness/Type of Exhibit:**

**Sponsoring Party:**

**Case No.:**

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ETC Designation  
Meisenheimer/  
Supplemental Rebuttal  
Public Counsel  
TO-2006-0172

**SUPPLEMENTAL REBUTTAL TESTIMONY**

**OF**

**BARBARA A. MEISENHEIMER**

Submitted on Behalf of the Office of the Public Counsel

**APPLICATION OF MISSOURI RSA NO. 5 PARTNERSHIP  
FOR ETC DESIGNATION**

**CASE NO. TO-2006-0172**

May 18, 2006

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

In the Matter of the Application of Missouri RSA )  
No. 5 Partnership for Designation as a )  
Telecommunications Carrier Eligible for Federal Case No. TO-2006-0172  
Universal Service Support Pursuant to 254 of the )  
Telecommunications Act of 1996 )

**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 supplemental rebuttal testimony consisting of pages 1 through 3.
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 May 2006.



JERENE A. BUCKMAN  
My Commission Expires  
August 10, 2009  
Cole County  
Commission #05754036

  
Jerene A. Buckman  
Notary Public

My Commission expires August 10, 2009.

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**SUPPLEMENTAL REBUTTAL TESTIMONY**  
**OF**  
**BARBARA MEISENHEIMER**  
**CASE NO. TO-2006-0172**  
**APPLICATION OF MISSOURI RSA 5 PARTNERSHIP**  
**FOR ETC STATUS**

**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.

**Q. HAVE YOU TESTIFIED PREVIOUSLY IN THIS CASE?**

A. Yes, I filed rebuttal testimony on May, 9, 2006.

**Q. WHAT INFORMATION DID YOU REVIEW IN PREPARATION OF YOUR TESTIMONY?**

A. I reviewed the supplemental direct testimony of James Simon and Jonathan  
Reeves filed on behalf of Missouri RSA No. Partnership (MO5 or Company).

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

A. The purpose of my testimony is to respond to the Company's supplemental direct  
testimony.

**Q. DOES PUBLIC COUNSEL CURRENTLY SUPPORT THE COMPANY'S APPLICATION  
FOR ETC STATUS?**

A. No. Based on the information and commitments received to date, as reflected in  
the Company's Application, direct testimony and supplemental direct testimony,  
Public Counsel cannot support granting MO5 ETC status. Although the Company  
has updated its testimony to be more consistent with the Commission's proposed

1 ETC rule and has submitted additional detailed information consistent with the  
2 proposed rule, the supplemental testimony does not address or diminish the  
3 following concerns raised in my May 9, 2006, rebuttal testimony:

- 4 • The terms and conditions of the Company's Lifeline and Link-Up proposals  
5 are not fully described and there is no assurance that the Company's rates and  
6 terms of service will not change adverse to the customer's interest once the  
7 Company gains PSC approval.
- 8 • The supplemental testimony does not address whether the Company will  
9 commit to inform prospective Lifeline customers of the price of the lowest cost  
10 available handset.
- 11 • The supplemental testimony does not correct the misleading comparison of  
12 Lifeline rates I identified in Appendix K to the direct testimony of James  
13 Simon.
- 14 • The supplemental testimony does not demonstrate that the ILEC equivalent  
15 plan is equivalent in terms of price or terms of service to the ILECs' basic local  
16 services.
- 17 • The supplemental testimony does not identify any equipment change fees, term  
18 commitments, early termination fees, or credit check that may be a condition of  
19 service for the Lifeline and ILEC equivalent plans.
- 20 • Regarding calling scopes, the supplemental testimony does not address how its  
21 services compare to mandatory expanded basic local services such as  
22 traditional EAS or Mark Twain's company-wide calling scopes. It is still  
23 unclear whether toll and roaming charges will apply to calls to and from  
24 traditionally toll free areas.

- 1           • Resale is not identified among the methods listed on page 13 of Mr. Simon's  
2           supplemental direct testimony as an option for serving currently unserved  
3           areas; however, resale is mentioned on page 17. It is still unclear whether the  
4           Company is adequately prepared to utilize resale as an option for serving  
5           customers in a timely manner.

6           **Q. WITH REGARD TO THE PROPOSED ETC RULES' LIMITS RELATED TO CUSTOMER**  
7           **FUNDED CONSTRUCTION, SHOULD THE COMPANY BE REQUIRED TO COMPLY?**

8           A. It would serve the public interest for MO5 to limit customers' contributions to  
9           construction or extensions. That limit should be no more than the amount the  
10          relevant ILEC charges. Despite a tariff provision, many incumbents currently do  
11          not charge customers for line extensions or other construction necessary to  
12          provide service. Instead, the ILEC absorbs those costs, recovering them through  
13          normal rates and universal service support. MO5 should commit to do the same.

14          **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

15          A. Yes, it does.