

Exhibit No.:

Issues:

Witness: Amonia L. Moore

Sponsoring Party: MO PSC

Type of Exhibit: Supplemental Direct Testimony

Case No.: TO-99-483

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

SUPPLEMENTAL DIRECT TESTIMONY

OF

AMONIA L. MOORE

CASE NO. TO-99-483

Jefferson City, Missouri

April 21, 2000

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

NP

1 **SUPPLEMENTAL DIRECT TESTIMONY**
2 **OF**
3 **AMONIA L. MOORE**
4 **METROPOLITAN CALLING AREA PLAN**
5 **CASE NO. TO-99-483**
6

7 **Q. Please state your name.**

8 **A. Amonia L. Moore.**

9 **Q. Are you the same Amonia L. Moore who filed direct testimony in the case?**

10 **A. Yes.**

11 **Q. Do you have any corrections or additions to your direct testimony at this time?**

12 **A. Yes.**

13 **Q. What corrections are you making to your direct testimony at this time?**

14 **A. In my direct testimony on Page 4 at line 15 and Page 5 at line 18, I stated that there**
15 **were 340,569 subscribers in the optional St. Louis, Kansas City, and Springfield**
16 **Metropolitan Calling Area (MCA) tiers. This figure should have been 363,087. The**
17 **original figure was incorrect due to a data input error. The revised figure of 363,087**
18 **has no significant effect on the amounts, percentages, and relationships between the**
19 **carriers that were reported in Schedules 1 and 2 of my direct testimony.**

20 **Q. What additional information and/or material are you adding to your direct**
21 **testimony at this time?**

1 A. In his surrebuttal testimony, Staff witness Bill Voight stated that "...Staff intends to
2 file another round of testimony which supplements Staff's direct testimony with
3 highly confidential information regarding revenue impact data associated with MCA-
4 2...."¹ Staff's MCA-2 plan (dubbed MCA-2) is a proposed modification of the current
5 MCA plan and was described in Mr. Voight's direct testimony. This supplemental
6 direct testimony contains the revenue impact data that the Incumbent Local Exchange
7 Carriers (ILECs) submitted to Staff in response to Staff's January 7, 2000, Data
8 Request No. 12 (DR 12), which is attached hereto as Schedule 1 and will be discussed
9 subsequently. Schedule 2 summarizes the ILECs' responses to DR 12, and Schedules
10 3 through 7 provide details for the revenue impacts reported on Schedule 2.

11 **Q. What information did Data Request No. 12 seek to obtain?**

12 A. Essentially, DR 12 asked the ILECs to derive an estimated revenue impact amount
13 that would indicate how MCA-2 would affect revenue streams.

14 **Q. Did Staff receive responses from the ILECs to Data Request No. 12?**

15 A. By February 28, 2000, Staff had received responses from the nine ILECs that
16 participate in the MCA Plan: Southwestern Bell Telephone Company (SWBT); GTE
17 Midwest Incorporated (GTE); Sprint; The Small Telephone Company Group
18 consisting of Orchard Farm, Cass County Telephone Company (Cass County),
19 Lathrop Telephone Company (Lathrop), and ALLTEL Communications, Inc.
20 (ALLTEL); and the Mid-Missouri Group consisting of Mo-Kan Dial, Inc. (MoKan)
21 and Choctaw Telephone Company (Choctaw).
22

¹ Voight, surrebuttal, page 1.

1 **Q. How would the revenues of the ILECs be affected by Staff's proposed MCA-2**
2 **plan?**

3 **A.** As shown on Schedule 2, all of the companies that responded indicated that their
4 companies would be negatively impacted if Staff's MCA-2 plan were to be
5 implemented. Schedules 3 through 7 summarize the items used by the carriers to
6 determine the revenue impacts. Specifically, there were three main areas where
7 revenues would be impacted: (1) toll revenue loss, (2) access revenue loss
8 (originating and terminating), and (3) access expense reduction (savings) – the net
9 effect being a negative impact. Subsequent to Staff's verification of the submitted
10 revenue impact calculations—at an April 4, 2000, meeting convened with
11 representatives of all ILECs participating in the MCA plan—additional financial
12 considerations were raised. These ILECs stated the need for additional time to
13 consider the appropriateness and significance of these financial considerations. The
14 ILECs indicated their desire to either supplement or revise their responses to address
15 these additional financial considerations. On April 11, 2000, SWBT, GTE, and Sprint
16 submitted revised revenue impact data. On April 20, 2000, MoKan Dial and Choctaw
17 submitted their estimated data. The Small Telephone Company Group did not have to
18 revise their data.

19 **Q. How much of a negative impact would the ILECs incur?**

20 **A.** The estimated total revenue impact for all of the ILECs would be a loss of \$516,000
21 per month or \$6.192 million per year.

22 **Q. How much would the revenue impact be for each of the ILECs?**

SCHEDULES 2 THROUGH 7

ILEC REVENUE IMPACTS

ASSOCIATED WITH PROPOSED MCA-2 PLAN

Case No. TO-99-483

**THESE SCHEDULES HAVE BEEN DEEMED
HIGHLY CONFIDENTIAL
IN THEIR ENTIRETY.**