

Exhibit No:

Issues: Switched Access, Special Access, SS7 and LIDB

Witness: Sandra Douglas

Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Southwestern Bell Telephone Company

Case No: TO-2001-467

**SOUTHWESTERN BELL TELEPHONE COMPANY**

**CASE NO. TO-2001-467**

**SURREBUTTAL TESTIMONY**

**OF**

**SANDRA M. DOUGLAS**

Dallas, Texas  
September 17, 2001

**FILED**


SEP 17 2001

Missouri Public  
Service Commission

In the Matter of the Investigation of the State of ) Case No. TO-2001-467  
Competition in the Exchanges of Southwestern Bell )  
Telephone Company. )

STATE OF TEXAS                                 )  
  )       SS  
CITY OF DALLAS                                 ).

1. My name is Sandra M. Douglas. I am presently Area Manager - State Access for Southwestern Bell Telephone Company.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

  
Sandra M. Douglas

K Diane Cooper  
Notary Public



**K. DIANE COOPER**  
**MY COMMISSION EXPIRES**  
**August 10, 2003**

**CASE NO. TO-2001-467**  
**SOUTHWESTERN BELL TELEPHONE COMPANY**  
**SURREBUTTAL TESTIMONY OF SANDRA M. DOUGLAS**

1   **INTRODUCTION**

2   **Q.     What is your name and business address?**

3   A.     My name is Sandra M. Douglas. My business address is 311 S. Akard,  
4           Dallas, Texas.

5  
6   **Q.     Are you the same Sandra M. Douglas who filed direct testimony in**  
7           **this case on June 28, 2001?**

8   A.     Yes, I am.

9  
10   **Q.     What is the purpose of your surrebuttal testimony?**

11   A.     The purpose of my surrebuttal testimony is to address specific issues  
12           raised in rebuttal testimony by the Missouri Public Service Commission  
13           Staff ("Staff"), as well as other parties.

14  
15   **Q.     Do you agree Southwestern Bell Telephone Company ("SWBT") is**  
16           **free to lower Switched Access prices under the current regulatory**  
17           **scheme as stated on page 9, line 4 of Mr. William Voight's rebuttal?**

18   A.     Yes, but that does not tell the entire story. While SWBT may have the  
19           authority to decrease Switched Access rates which are above cost, it does  
20           not have the authority to increase other rates that may be below cost in  
21           order to remain revenue neutral. For example, residential local service

1 prices have been priced residually in order to further universal service  
2 goals. These services have been subsidized by above cost Switched  
3 Access and other services. As Mr. Hughes discusses in his surrebuttal  
4 testimony, SWBT would have more ability to consider rebalancing rates  
5 under a competitive designation.

6  
7 The Missouri Public Service Commission ("Commission") also recognizes  
8 this interrelationship as demonstrated by comments filed with the Federal  
9 Communications Commission ("FCC") in Docket No. 01-92<sup>1</sup> (Unified  
10 Intercarrier Compensation), which has been established to review  
11 intercarrier compensation arrangements and to examine increasing end  
12 user rates to recover the cost of local service. In its comments the  
13 Commission suggested it "may be appropriate to establish a federal/state  
14 working group to analyze the issues...in greater detail" to address the  
15 issues raised by the FCC, such as, whether state commissions need to  
16 move intrastate access charges toward forward looking economic costs,  
17 rebalance local service rates and analyze the impact on end users and  
18 universal service.

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<sup>1</sup> Comments of the Public Service Commission of the State of Missouri, Docket No. 01-92, In the Matter of Developing a Unified Intercarrier Compensation Regime, filed August 21, 2001, page 2.

1 **Q. In light of SBC's comments in FCC Docket No. 01-92 (Unified**  
2 **Intercarrier Compensation), is it premature for SWBT to request a**  
3 **competitive designation for intrastate Switched Access service?**

4 A. It was not premature for SWBT to seek a competitive classification for  
5 intrastate Switched Access services in Missouri because SWBT does not  
6 have the same pricing flexibility as Competitive Local Exchange Carriers  
7 ("CLECs"). In addition, the parameters of the definition of effective  
8 competition would appear to include Switched Access services for the  
9 reasons set forth in my direct testimony. In fact, the Commission's  
10 determination that SWBT has met the standards required for interLATA  
11 relief in Missouri also support a finding that all services are subject to  
12 effective competition. Moreover, the FCC has found there is sufficient  
13 competition in specific areas of SWBT's region to warrant pricing  
14 flexibility<sup>2</sup>. However, in light of the pending FCC Unified Intercarrier  
15 Compensation docket, SWBT is willing to defer a determination that all  
16 rate elements of Switched Access are subject to effective competition and  
17 accept the level of relief available to CLECs.

18  
19 **Q. What flexibility do CLECs have with regard to Switched Access**  
20 **charges?**

21 A. Pursuant to the Commission's decision in Case No. TO-99-596, CLECs'

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<sup>2</sup> March 14, 2001, Memorandum Opinion and Order, In the Matter of Petition of Southwestern Bell Telephone Company for Pricing Flexibility, CCB/CPD No. 00-25.

1 Switched Access rates are capped at the rate of the incumbent local  
2 exchange company ("ILEC") in whose territory the CLEC competes. But  
3 the CLEC is not required to match the ILEC's rate structure or rates, so  
4 long as the overall average rate is within the cap.

5  
6 Section 3.40 of the Commission's website which provides instructional  
7 guidelines for CLEC Applications, Tariffs and Interconnection Agreements  
8 and is attached as Schedule 1, describes the tariffing requirements of  
9 CLECs offering facility-based Switched Access service. A CLEC must  
10 cap its Switched Access charges at the level of the ILEC in whose  
11 territory the CLEC seeks to compete, but is given the flexibility to  
12 structure its Switched Access rates as the CLEC determines appropriate  
13 even while being subject to the cap. At a minimum, this level of pricing  
14 flexibility should be granted to SWBT.

15  
16 **Q. Ms. Rippentrop states on page 16, line 7 of her testimony that the**  
17 **FCC has not found Switched Access to be competitive. Do you**  
18 **agree with this assessment?**

19 **A.** No, I do not. Ms. Rippentrop appears to be defining Switched Access as  
20 including the common line, local switching and transport rate elements  
21 collectively. After complying with specific federal requirements, the FCC  
22 has determined it is appropriate to designate Switched Access dedicated  
23 transport as competitive based upon a specific showing.

1   **Q.    Did the FCC find any of SWBT's Switched Access rate elements**  
2       **to be competitive at the federal level?**

3   A.   As discussed previously, the FCC did grant SWBT's first petition for  
4       pricing flexibility for a number of dedicated transport rate elements<sup>3</sup>.  
5

6   **Q.    Was this designation granted for all transport service offered by**  
7       **SWBT?**

8   A.   As Ms. Rippentrop points out on page 14, line 1 of her testimony, the FCC  
9       requires a showing by Metropolitan Statistical Area ("MSA").  
10

11   **Q.    For which MSAs was SWBT granted pricing flexibility by the FCC?**

12   A.   The FCC granted pricing flexibility in 42 MSAs in SBC's 13 state region.  
13       Those in Missouri for which SWBT was granted pricing flexibility are the  
14       St. Louis, Kansas City and Springfield MSAs.  
15

16   **Q.    Which Missouri exchanges are included in the St. Louis, Kansas City**  
17       **and Springfield MSAs?**

18   A.   Schedule 2 provides a list of the exchanges in the St. Louis, Kansas City  
19       and Springfield MSAs.  
20

21   **Q.    Does Schedule 2 include every exchange in Missouri?**

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<sup>3</sup> Id.

1 A. No, it does not. At this time, SWBT has not petitioned the FCC for pricing  
2 flexibility outside of the St. Louis, Kansas City and Springfield MSAs.

3  
4 **Q. Ms. Rippentrop states on page 8, line 1 of her testimony that it is**  
5 **more appropriate to discuss the restructuring of local transport in**  
6 **Case No. TR-2001-65. Do you agree with this assessment?**

7 A. If Case No. TR-2001-65 is limited to a review of the usage sensitive costs  
8 associated with Switched Access, then it is not appropriate to include the  
9 restructure of access charges in Case No. TR-2001-65.

10  
11 **Q. Please explain.**

12 A. As Ms. Rippentrop explained on page 7, line 13 of her rebuttal testimony,  
13 loop costs are non traffic sensitive (i.e., not usage sensitive). Recognizing  
14 this the FCC has moved recovery of the interstate portion of the local loop  
15 from the usage sensitive carrier common line ("CCL") rate element to flat  
16 rated end user charges<sup>4</sup>. SWBT's federal CCL rate element is now zero  
17 rated because SWBT is able to recover the interstate local loop cost via  
18 assessment of the EUCL charges.

19  
20 **Q. Ms. Douglas, are there any other items in the other parties' rebuttal**  
21 **testimony that you would like to address?**

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<sup>4</sup> The flat rate end user charges are the End User Common Line (EUCL) charge, which is assessed on all lines, and the Presubscribed Interexchange Carrier Charge (PICC), which is assessed only on multiline business lines.



1 A. Yes. I would like to address various statements made by Mr. Kohly  
2 regarding Switched Access, Special Access and the federal policies  
3 regarding the FCC's rules and various statements by Mr. Voight.  
4

5 **Q. On page 42, line 3 of Mr. Voight's rebuttal testimony, he states your**  
6 **direct testimony provides no evidence of allegations that SWBT has**  
7 **experienced a reduction in Switched Access minutes attributed to**  
8 **wireless usage. Have SWBT's Missouri Switched Access MOUs**  
9 **been declining?**

10 A. I have attached Schedule 3, which provides the growth rates of SWBT's  
11 total (interstate plus intrastate) Missouri Switched Access MOUs by  
12 exchange for 1998, 1999, 2000 and January through July, 2001. With the  
13 exception of 2001, it shows MOUs have continued to increase year over  
14 year but at a declining rate. The 2001 data currently shows a decrease in  
15 year over year MOUs.  
16

17 **Q. If Schedule 3 were populated with intrastate data only, would the**  
18 **result be similar?**

19 A. Although there would be slight variations in specific exchanges, the results  
20 are generally the same for both the interstate and intrastate jurisdictions.  
21

1   **Q.    Mr. Kohly states on page 28, lines 4 through 7 that SWBT's interstate**  
2       **Switched Access rates are set until July, 2005. Is that an accurate**  
3       **statement?**

4   **A.**    No, this is not an accurate statement. Under the CALLS plan Mr. Kohly  
5       refers to, and to which AT&T was a signatory, SWBT's interstate Switched  
6       Access revenues that remain in federal price caps will be adjusted in  
7       future federal annual filings until such time as SWBT meets the interstate  
8       average traffic sensitive rate required in the CALLS Plan. Based upon  
9       current data, it is expected that these future adjustments will result in a  
10      decrease in interstate Switched Access price cap revenue at least through  
11      the next federal annual filing, which will be filed approximately June 15,  
12      2002.

13  
14   **Q.    What do you mean by revenue that remains in price caps?**

15   **A.**    The CALLS plan is associated with federal price cap revenue only. Once  
16       SWBT receives pricing flexibility approval for an MSA from the FCC, all  
17       interstate Switched Access revenue in the MSA associated with the  
18       approved rate elements is removed from the federal price cap formula.  
19       Once this revenue is removed from price caps, SWBT is allowed to price  
20       as it determines is appropriate in response to competitive pressures.  
21       Some prices will be increased and some prices will be decreased. These  
22       interstate pricing decisions have no impact on interstate price cap  
23       revenue.

1 **Q. Mr. Kohly states on page 28, line 2 that SWBT does not have the**  
2 **ability to restructure the Switched Access rate elements. Is this an**  
3 **accurate statement?**

4 A. No. The CALLS Plan does not preclude any federal price cap company  
5 from restructuring interstate Switched Access services. Under the federal  
6 price cap rules the only requirement is the indices associated with the  
7 proposed revenue not cause the price cap indices to be exceeded<sup>5</sup>. For  
8 example, if SWBT would determine it appropriate to establish a call set up  
9 charge, as allowed in the FCC's Access Reform Order<sup>6</sup>, SWBT's  
10 interstate local switching rate element would most likely be impacted.

11  
12 **Q. Does Mr. Kohly provide any material reasons why Special Access**  
13 **should not be designated as competitive?**

14 A. No. Mr. Kohly provides no support that Special Access service should not  
15 be designated as competitive, as recommended by Staff. While Mr. Kohly  
16 references both Switched Access and Special Access at several places in  
17 his rebuttal testimony, the substance of his claims concerned Switched  
18 Access, not Special Access.

19  

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<sup>5</sup> At the basket level, the Actual Price Index (API) may not exceed the Price Cap Index (PCI) and at the subcategory level the Service Band Index (SBI) may not exceed the SBI Upper Limit.

<sup>6</sup> First Report and Order, In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing and End User Common Line Charges, CC Docket Nos. 96-262, 94-1, 91-213 and 95-72, released May 16, 1997.

1    **Q.    Mr. Voight at page 43 of his Rebuttal Testimony supports a**  
2           **competitive declaration for SS7 and LIDB services. Did any party**  
3           **provide any evidence to the contrary?**

4    **A.    No.**

5

6    **Q.    Does this conclude your testimony?**

7    **A.    Yes it does.**

### 3.40 Switched Access Services – (facilities-based)

Since switched access is purchased by other telecommunications companies (and not end-users), facilities based CLECs are strongly encouraged to have a different P.S.C. Mo. Number for its switched access tariff than the P.S.C. Mo. Number used for local services purchased by end-users. The same should be generally true for interexchange services.

Tariff needs to be clear in the application and rates for switched access services charged to interexchange carriers for intrastate calls. For example, terms of meet-point billing, if applicable, should be clearly set forth in those instances where the CLEC and ILEC each bill the IXC for use of the local network. Additionally, terms of local transport, end-office switching, CCL, and entrance facilities, all of which may or may not be appropriate depending on the Applicant's method of applying charges, should be clearly stated in the tariff.

The tariff should be clear in instances where the switch is serving as an end-office, serving wire center, tandem, or all three. The tariff should state if tandem switching/transport rate elements apply to IXCs in either case. Rates for switched access services are required to be "cost based". Pursuant to Case No. TO-99-596, intrastate switched access rates in Missouri are capped at a rate no higher than the incumbent(s) with whom the Applicant seeks to compete. Note: Incumbent local exchange carriers in Missouri have not restructured local transport and do not use rate elements such as interconnection charges and entrance facilities. However, the Commission has approved tariffs of competitive local exchange carriers who do utilize local transport restructuring. In such instances, the Staff will make calculations to ensure that the competitor's restructured rates are no greater in the aggregate than an incumbent's rates utilizing the equal charge method of providing switched access service. In such instances, the Staff will question any competitive rate element which appears to be residually priced. If the Applicant has any questions about switched access tariffs, please contact a staff member prior to filing the tariff.

**Missouri MSAs/Exchanges Granted Pricing Flexibility  
by the FCC**

<b>MSA</b>	<b>Exchange</b>
Kansas City	Archie
Kansas City	Blue Springs
Kansas City	Excelsior Springs
Kansas City	Kansas City
Kansas City	Richmond
Kansas City	Smithville
Springfield	Ash Grove
Springfield	Billings
Springfield	Clever
Springfield	Fair Grove
Springfield	Nixa
Springfield	Republic
Springfield	Springfield
Springfield	Strafford
Springfield	Walnut Grove
Springfield	Willard
St. Louis	Antonia
St. Louis	Beaufort
St. Louis	Cedar Hill
St. Louis	Chesterfield
St. Louis	DeSoto
St. Louis	Eureka
St. Louis	Fenton
St. Louis	Festus-Crystal City
St. Louis	Gravois Mills
St. Louis	Harvester
St. Louis	Herculaneum-Pevely
St. Louis	High Ridge
St. Louis	Hillsboro
St. Louis	Imperial
St. Louis	Manchester
St. Louis	Maxville
St. Louis	Pacific
St. Louis	Pond
St. Louis	Portage Des Sioux
St. Louis	St. Charles
St. Louis	St. Clair
St. Louis	St. Louis
St. Louis	Union
St. Louis	Valley Park
St. Louis	Ware
St. Louis	Washington

# Missouri Total Interstate + Intrastate Switched Access MOUs

Exchange	% of Total Usage	1998:1999 Growth	1999:2000 Growth	2000:2001 Growth	Change in Growth Rate 98:99 to 00:01
<b>TOTAL MISSOURI</b>	<b>100.00%</b>	<b>0.06</b>	<b>0.03</b>	<b>(0.03)</b>	<b>(1.52)</b>
Adrian	0.0578%	0.07	0.12	(0.02)	(1.30)
Advance	0.0670%	0.06	0.09	0.03	(0.47)
Agency	0.0305%	0.06	0.05	(0.04)	(1.65)
Altenburg-Frohna	0.0189%	0.08	0.17	(0.06)	(1.72)
Antonia	0.0882%	0.12	0.07	0.04	(0.67)
Archie	0.0279%	0.25	0.05	0.00	(0.98)
Argy	0.0071%	0.35	0.07	(0.06)	(1.18)
Armstrong	0.0131%	0.04	0.13	(0.05)	(2.14)
Ash Grove	0.0425%	0.07	0.12	0.04	(0.40)
Beaufort	0.0398%	0.05	0.12	0.04	(0.20)
Bell City	0.0129%	0.05	0.05	0.00	(0.92)
Benton	0.0524%	0.04	0.06	0.00	(0.94)
Billings	0.0414%	0.04	0.07	(0.01)	(1.24)
Bismarck	0.0493%	0.13	0.06	0.07	(0.46)
Bloomfield	0.0637%	0.08	0.16	0.01	(0.91)
Bloomsdale	0.0710%	0.02	0.00	0.01	(0.73)
Blue Springs	1.1149%	0.08	0.02	(0.03)	(1.40)
Bonne Terre	0.1605%	0.10	0.13	(0.02)	(1.24)
Boonville	0.2735%	0.06	0.07	(0.00)	(1.01)
Bowling Green	0.1422%	0.11	0.16	0.09	(0.21)
Brookfield	0.1400%	0.06	0.10	0.08	0.47
Camdenton	0.3888%	0.08	0.11	0.01	(0.88)
Camdenton North	0.0889%	0.10	0.11	0.22	1.16
Campbell	0.0522%	0.02	0.22	(0.03)	(3.07)
Cape Girardeau	1.3010%	0.09	0.04	(0.05)	(1.63)
Cardwell	0.0451%	(0.01)	0.09	(0.02)	1.58
Carl Junction	0.0936%	0.14	0.08	0.01	(0.91)
Carrollton	0.1113%	0.09	0.09	0.03	(0.63)
Carthage	0.5240%	0.08	0.10	0.03	(0.62)
Caruthersville	0.1679%	0.03	0.11	0.08	1.62
Cedar Hill	0.1725%	0.09	0.08	0.02	(0.82)
Center	0.0234%	0.18	0.24	0.05	(0.73)
Chaffee	0.0538%	0.15	0.09	(0.05)	(1.30)
Charleston	0.1604%	0.04	0.12	(0.00)	(1.05)
Chesterfield	1.8647%	0.11	0.02	0.01	(0.88)
Chillicothe	0.2871%	0.04	0.13	0.04	0.14
Clarksville	0.0266%	0.04	(0.00)	0.06	0.45
Clever	0.0415%	0.17	0.13	0.09	(0.44)
Climax Springs	0.0300%	0.09	0.07	0.20	1.17
Climax Springs North	0.0736%	0.09	0.11	0.02	(0.78)
Deering	0.0182%	0.08	0.21	0.05	(0.37)
Delta	0.0237%	0.14	0.06	(0.02)	(1.13)
DeSoto	0.2435%	0.08	0.07	(0.00)	(1.06)
Dexter	0.2863%	0.05	0.09	0.01	(0.83)
Downing	0.0154%	0.08	0.20	(0.04)	(1.46)
East Prairie	0.0953%	0.08	0.12	0.04	(0.50)

# Missouri Total Interstate + Intrastate Switched Access MOUs

Exchange	% of Total Usage	1998:1999 Growth	1999:2000 Growth	2000:2001 Growth	Change in Growth Rate
Edina	0.0461%	0.11	0.15	(0.05)	(1.47)
Eldon	0.2926%	0.08	0.06	0.05	(0.43)
Elsberry	0.0743%	0.11	0.05	0.03	(0.74)
Essex	0.0192%	0.11	0.12	(0.09)	(1.83)
Eureka	0.2274%	0.13	0.10	0.02	(0.88)
Excelsior Springs	0.2417%	0.09	0.14	(0.02)	(1.28)
Fair Grove	0.0700%	0.12	0.09	0.02	(0.87)
Farmington	0.4516%	0.09	0.06	0.06	(0.31)
Fayette	0.1249%	0.08	0.05	(0.03)	(1.34)
Fenton	0.7704%	0.04	(0.04)	(0.05)	(2.40)
Festus-Crystal City	0.4529%	0.07	0.12	(0.02)	(1.22)
Fisk	0.0213%	0.05	0.09	0.05	(0.06)
Flat River	0.2778%	0.18	0.11	0.05	(0.71)
Frankford	0.0169%	0.14	0.16	0.02	(0.86)
Fredericktown	0.1722%	0.10	0.05	0.02	(0.79)
Freeburg	0.0210%	0.33	0.02	(0.02)	(1.07)
Fulton	0.5585%	0.07	0.05	0.03	(0.59)
Gideon	0.0417%	0.05	0.27	(0.01)	(1.15)
Glasgow	0.0349%	0.07	0.19	(0.02)	(1.31)
Gravois Mills	0.1252%	0.10	0.10	0.01	(0.85)
Gray Summit	0.1553%	0.07	0.07	(0.00)	(1.02)
Hannibal	0.5959%	0.11	0.12	0.07	(0.37)
Harvester	1.8020%	0.09	0.08	(0.14)	(2.55)
Hayti	0.1263%	0.09	0.09	0.03	(0.70)
Herculaneum-Pevely	0.1249%	0.09	0.06	(0.05)	(1.60)
Higbee	0.0276%	0.08	0.24	(0.01)	(1.09)
High Ridge	0.2815%	0.06	0.07	0.02	(0.62)
Hillsboro	0.1282%	0.09	(0.03)	0.03	(0.72)
Holcomb	0.0251%	0.05	0.20	0.04	(0.10)
Hornersville	0.0309%	0.12	0.28	0.01	(0.91)
Horseshoe Bend	0.2122%	0.09	0.04	(0.09)	(2.08)
Imperial	0.2965%	0.12	0.07	0.01	(0.95)
Jackson	0.3711%	0.13	0.05	0.00	(0.99)
Jasper	0.0395%	0.06	0.06	0.00	(0.97)
Joplin	2.3756%	0.09	0.08	(0.00)	(1.03)
Kansas City	21.7502%	0.05	(0.01)	(0.04)	(1.81)
Kennett	0.3010%	0.04	0.10	0.04	(0.02)
Kirksville	0.6196%	0.08	0.11	(0.00)	(1.03)
Knob Noster	0.3217%	0.12	0.10	0.06	(0.52)
La Monte	0.0343%	0.17	0.10	(0.01)	(1.07)
Lake Ozark	0.0754%	0.09	0.14	(0.03)	(1.29)
Lamar	0.1788%	0.07	0.08	(0.02)	(1.34)
Lancaster	0.0371%	0.09	0.13	(0.07)	(1.84)
Leadwood	0.0415%	0.15	0.06	0.05	(0.67)
Lilbourn	0.0370%	0.07	0.12	0.04	(0.39)
Linn	0.1169%	0.31	0.02	0.01	(0.98)
Lockwood	0.0441%	0.06	0.04	0.02	(0.75)
Louisiana	0.1259%	(0.01)	0.09	0.06	(6.88)



# Missouri Total Interstate + Intrastate Switched Access MOUs

Exchange	% of Total Usage	1998:1999 Growth	1999:2000 Growth	2000:2001 Growth	Change in Growth Rate
Macks Creek	0.0432%	0.12	0.09	0.08	(0.31)
Malden	0.1499%	0.05	0.14	0.03	(0.36)
Manchester	2.0973%	0.07	0.03	(0.10)	(2.51)
Marble Hill	0.0868%	0.74	0.05	0.03	(0.96)
Marceline	0.0722%	0.06	0.13	0.05	(0.14)
Marionville	0.0599%	0.13	0.13	0.03	(0.78)
Marshall	0.3564%	0.12	0.13	0.01	(0.95)
Marston	0.0412%	0.10	(0.05)	(0.06)	(1.55)
Maxville	0.4771%	0.15	0.24	(0.00)	(1.01)
Meta	0.0206%	0.37	0.08	(0.03)	(1.09)
Mexico	0.4910%	0.06	0.40	(0.21)	(4.29)
Moberly	0.3854%	0.10	(0.31)	(0.02)	(1.25)
Monett	0.3032%	0.09	0.14	0.05	(0.45)
Montgomery City	0.1028%	0.03	0.10	0.04	0.08
Morehouse	0.0206%	0.08	0.14	(0.01)	(1.17)
Neosho	0.4827%	0.09	0.14	(0.00)	(1.00)
Nevada	0.3716%	0.11	0.07	0.01	(0.95)
New Franklin	0.0357%	0.11	0.07	(0.02)	(1.21)
New Madrid	0.0705%	0.01	0.17	0.00	(0.80)
Nixa	0.4517%	0.11	0.07	0.03	(0.71)
Oak Ridge	0.0114%	0.13	0.08	(0.05)	(1.38)
Old Appleton	0.0177%	0.08	0.11	(0.02)	(1.21)
Oran	0.0385%	0.04	0.10	(0.04)	(1.84)
Osage Beach	0.3696%	0.05	0.06	(0.07)	(2.54)
Pacific	0.2075%	0.11	0.07	0.02	(0.81)
Patton	0.0423%	0.13	0.05	0.06	(0.49)
Paynesville	0.0055%	0.07	(0.01)	0.02	(0.77)
Perryville	0.2864%	0.10	0.03	0.00	(0.96)
Pierce City	0.0593%	0.09	0.11	0.05	(0.44)
Pocahontas-New Wells	0.0164%	0.07	0.06	0.02	(0.67)
Pond	0.6384%	0.12	0.04	(0.01)	(1.10)
Poplar Bluff	0.7568%	0.05	0.11	0.03	(0.45)
Portage Des Sioux	0.0162%	0.15	0.04	0.12	(0.14)
Portageville	0.0898%	0.01	0.12	0.02	1.16
Puxico	0.0496%	(0.02)	0.09	0.03	(2.12)
Puxico West	0.0440%	0.07	0.03	0.10	0.41
Qulin	0.0402%	0.18	0.14	(0.05)	(1.25)
Republic	0.1935%	0.10	0.12	(0.01)	(1.06)
Richmond	0.1569%	0.11	0.15	(0.02)	(1.15)
Richwoods	0.0172%	0.09	0.03	0.03	(0.65)
Risco	0.0117%	0.02	0.20	0.02	0.28
Rogersville	0.0986%	0.10	0.05	(0.02)	(1.21)
Rushville	0.0219%	0.07	0.03	0.08	0.14
San Antonio	0.0185%	0.03	0.04	0.08	1.70
Scott City	0.0935%	0.11	0.04	(0.02)	(1.22)
Sedalia	0.8098%	0.11	0.08	0.02	(0.83)
Senath	0.0424%	(0.00)	0.19	0.05	(147.39)
Sikeston	0.6545%	0.05	0.08	(0.09)	(2.58)

# Missouri Total Interstate + Intrastate Switched Access MOUs

Exchange	% of Total Usage	1998:1999 Growth	1999:2000 Growth	2000:2001 Growth	Change in Growth Rate
Slater	0.0440%	0.11	0.05	0.06	(0.46)
Smithville	0.1518%	0.12	0.12	0.01	(0.88)
Springfield	6.2895%	0.04	0.01	(0.06)	(2.43)
St. Charles	1.3923%	0.05	0.02	(0.12)	(3.29)
St. Clair	0.2374%	0.05	(0.00)	(0.00)	(1.04)
St. Joseph	1.8231%	0.10	0.10	0.02	(0.83)
St. Louis	33.2676%	0.04	0.02	(0.04)	(1.93)
St. Marys	0.0352%	0.06	0.06	0.01	(0.82)
Stanberry	0.0303%	0.09	0.23	0.00	(0.99)
Ste. Genevieve	0.1507%	0.06	0.08	(0.00)	(1.00)
Strafford	0.0961%	0.09	0.03	(0.08)	(1.95)
Sunrise Beach	0.2500%	0.09	0.08	(0.00)	(1.03)
Trenton	0.1665%	0.09	0.13	0.05	(0.51)
Tuscumbia	0.0415%	0.08	0.14	0.10	0.16
Union	0.2968%	0.07	0.04	(0.00)	(1.03)
Valley Park	0.5846%	0.04	(0.01)	0.01	(0.74)
Versailles	0.1579%	0.06	0.12	0.06	(0.00)
Vienna	0.0588%	0.27	(0.03)	(0.01)	(1.03)
Walnut Grove	0.0211%	0.19	0.11	0.05	(0.75)
Wardell	0.0160%	0.05	0.09	(0.02)	(1.44)
Ware	0.0175%	0.12	0.12	0.09	(0.28)
Washington	0.4721%	0.07	0.07	0.01	(0.81)
Webb City	0.2439%	0.12	0.12	0.00	(0.98)
Wellsville	0.0343%	0.09	0.05	0.09	(0.01)
Westpahlia	0.0455%	0.50	(0.22)	(0.41)	(1.81)
Willard	0.1143%	0.12	0.11	0.07	(0.45)
Wyatt	0.0128%	0.04	0.11	(0.01)	(1.16)