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Witness: Craig A. Unruh  
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d/b/a/ AT&T Missouri  
Case No.: TO-2007-0053  
Date Testimony Prepared: February 16, 2007

SOUTHWESTERN BELL TELEPHONE, L.P. d/b/a  
AT&T MISSOURI

CASE NO. TO-2007-0053

SURREBUTTAL TESTIMONY

OF


CRAIG A. UNRUH

St. Louis, Missouri

In the Matter of the Review of the Competitive )  
Classification of the Exchanges of Southwestern ) Case No. TO-2007-0053  
Bell Telephone, L.P., d/b/a AT&T Missouri. )

STATE OF MISSOURI )  
 ) SS  
CITY OF ST. LOUIS )

1. My name is Craig A. Unruh. I am Executive Director-Regulatory for Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri.
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.

  
Craig A. Uhrh

Maryann Russell  
Notary Public

MARYANN PURCELL  
Notary Public - Notary Seal  
STATE OF MISSOURI  
City of St. Louis  
My Commission Expires: Jan. 5, 2008

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**CASE NO. TO-2007-0053**  
**SOUTHWESTERN BELL TELEPHONE, L.P.,**  
**D/B/A/ AT&T MISSOURI**  
**SURREBUTTAL TESTIMONY OF CRAIG A. UNRUH**

**INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Craig A. Unruh and my business address is One AT&T Center, Room  
3528, St. Louis, Missouri, 63101.

**Q. ARE YOU THE SAME CRAIG A. UNRUH THAT FILED REBUTTAL  
TESTIMONY IN THIS CASE?**

A. Yes.

**PURPOSE AND MAIN POINTS OF TESTIMONY**

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

A. My testimony responds to the testimony of John Van Eschen,<sup>1</sup> which concludes  
that competitive classification should be confirmed for all of AT&T Missouri's  
competitively classified exchanges.

**Q. WHAT ARE THE MAIN POINTS THE COMMISSION SHOULD  
UNDERSTAND ABOUT YOUR TESTIMONY?**

A. The Commission should understand the following points about my testimony:

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<sup>1</sup> Rebuttal Testimony of John Van Eschen submitted on behalf of the Commission Staff (Staff) dated January 18, 2007.

- 1           • This case simply requires the Commission to review AT&T Missouri's  
2 competitive classifications previously granted by the Commission to ensure  
3 the required competitive criteria continue to exist.
- 4           • The evidence presented in Staff's report, Staff's rebuttal testimony and in my  
5 rebuttal testimony clearly demonstrates that the competitive criteria continue  
6 to exist.
- 7           • While I concur in general with Staff's assessment, I need to make the  
8 following clarifications for proper context and understanding:
- 9               (1) Wireless providers offer service in all exchanges at issue here. Even  
10 when a wireless carrier may not have its own local numbers, the  
11 wireless carrier can port local numbers from AT&T Missouri;
- 12               (2) While changes in carrier line counts are not relevant here, AT&T  
13 Missouri has also lost customer lines. Such fluctuations simply reflect  
14 the general decline in wireline usage and customers' exercise of their  
15 right to change carriers;
- 16               (3) There are additional exchanges beyond those identified by Staff that  
17 now qualify for competitive classification under the 30-day criteria.
- 18



1    **STAFF REACHES THE CORRECT CONCLUSION THAT COMPETITIVE**  
2    **CLASSIFICATION SHOULD BE CONFIRMED FOR ALL OF AT&T**  
3    **MISSOURI'S COMPETITIVELY CLASSIFIED EXCHANGES**

4    **Q.    DID STAFF CONCLUDE IN ITS REBUTTAL TESTIMONY THAT THE**  
5        **COMMISSION SHOULD CONFIRM COMPETITIVE CLASSIFICATION**  
6        **FOR AT&T MISSOURI'S EXCHANGES?**

7    A.    Yes. Mr. Van Eschen's rebuttal testimony reiterates what Staff concluded in its  
8        August 8, 2006 Report that the competitive conditions continue to exist so the  
9        Commission should confirm the competitive classifications.<sup>2</sup>

10

11   **Q.    DO YOU GENERALLY CONCUR WITH THIS ASSESSMENT?**

12   A.    Yes.

13

14   **AT&T MISSOURI'S CLARIFICATIONS**

15   **Q.    ARE THERE ANY MATTERS IN MR. VAN ESCHEN'S TESTIMONY TO**  
16        **WHICH YOU NEED TO RESPOND?**

17   A.    Yes. I need to make the following clarifications for proper context and  
18        understanding:

19

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<sup>2</sup> Sec, for example, Van Eschen Rebuttal Testimony, p. 2, ln. 10-11.

1   **(1) WIRELESS PROVIDERS OFFER SERVICE IN ALL EXCHANGES AT**  
2       **ISSUE AND PORTING ALLOWS THEM TO OFFER LOCAL**  
3       **TELEPHONE NUMBERS WHERE THEY MAY NOT HAVE THEIR OWN.**

4   **Q.   WHAT DID STAFF'S TESTIMONY SAY ABOUT WIRELESS**  
5       **CARRIERS?**

6   A.   Staff testified that there were more than enough CLEC providers in AT&T  
7       Missouri's exchanges to confirm competitive classification. Staff stated that it is  
8       not aware of any wireless provider exiting any markets.<sup>3</sup> Staff also reviewed  
9       numbering assignments and confirmed that wireless carriers have their own  
10      numbering resources in most exchanges thus indicating a presence in those  
11      exchanges.<sup>4</sup>

12  
13   **Q.   DOES THE ABSENCE OF NUMBERING RESOURCES INDICATE THAT**  
14       **A WIRELESS CARRIER IS NOT PRESENT?**

15   A.   No. As indicated in my rebuttal testimony, wireless carriers' websites were  
16       checked for service availability and we confirmed the presence of wireless carrier  
17       availability in all of AT&T Missouri's competitively classified exchanges,  
18       including the 12 exchanges noted in Staff's rebuttal testimony where wireless  
19       carriers may not have their own numbering resources.

20

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<sup>3</sup> Van Eschen Rebuttal Testimony, p. 13, ln. 4-7.

<sup>4</sup> Van Eschen Rebuttal Testimony, p. 13, ln. 11-15. Staff noted there are only 12 exchanges where wireless carriers do not appear to have directly assigned telephone numbers.

1    **Q.     CAN WIRELESS CARRIERS PORT TELEPHONE NUMBERS FROM**  
2           **AT&T MISSOURI TO PROVIDE SERVICE TO CUSTOMERS**  
3           **MIGRATING FROM AT&T MISSOURI TO A WIRELESS CARRIER?**

4    A.    Yes. If a customer chooses to replace AT&T Missouri's service with service  
5           from a wireless carrier, the customer may port his or her telephone number from  
6           AT&T Missouri to the wireless carrier. Customers can do this in all of AT&T  
7           Missouri's competitively classified exchanges, including the 12 exchanges Staff  
8           identified as exchanges where wireless carriers may not have their own local  
9           number resources.

10

11   **Q.     HAVE CUSTOMERS PORTED TELEPHONE NUMBERS FROM AT&T**  
12           **MISSOURI TO WIRELESS CARRIERS?**

13   A.    Yes. This type of wireline to wireless porting is occurring throughout the state  
14           and, in fact, has occurred within most of the 12 exchanges Staff identified as  
15           exchanges where wireless carriers may not have their own local number  
16           resources.

17

18   **Q.     WHILE STAFF INDICATED THAT NO WIRELESS CARRIER APPEARS**  
19           **TO HAVE DIRECTLY ASSIGNED TELEPHONE NUMBERS IN THE ST.**  
20           **CLAIR EXCHANGE, DOES US CELLULAR HAVE DIRECTLY**  
21           **ASSIGNED NUMBERS IN ST. CLAIR?**

22   A.    Recent numbering information from the Local Exchange Routing Guide (LERG)  
23           shows that US Cellular holds 1000 directly assigned telephone numbers in the St.



1 Clair exchange. US Cellular appears to have obtained this thousand-block when a  
2 new NXX code was opened for the expansion of MCA service in this exchange.

3

4 **Q. DOES MCA SERVICE PLAY A ROLE IN WIRELESS CARRIERS' USE**  
5 **OF TELEPHONE NUMBERS?**

6 A. Yes. Wireless carriers are able to take advantage of the expanded local calling  
7 scopes provided by MCA service to minimize the number of directly assigned  
8 telephone numbers they require. Wireless carriers can establish telephone  
9 numbers in the inner portion of the MCA and then all MCA subscribers are able  
10 to locally call these wireless customers. Since the vast majority of customers  
11 have MCA service, this means the vast majority of customers have local calling to  
12 the wireless carriers even though a wireless carrier may not have directly assigned  
13 telephone numbers in every MCA exchange. Ten of the twelve exchanges  
14 identified by Staff as not having directly assigned telephone numbers for wireless  
15 carriers are within an MCA calling area.<sup>5</sup>

16

17 **Q. DOES THE LAW REQUIRE WIRELESS CARRIERS TO HAVE LOCAL**  
18 **NUMBER RESOURCES AS A CONDITION FOR BEING COUNTED AS**  
19 **A COMPETITOR IN THE EXCHANGE?**

---

<sup>5</sup> The ten exchanges within an MCA calling area are Ash Grove, Billings, Clever, Farley, Grain Valley, Greenwood, Marionville, Richmond, St. Clair and Walnut Grove. The two exchanges that are not within an MCA calling area are Linn and Montgomery City.

1 A. No. The law simply indicates that one wireless carrier may be counted in an  
2 exchange and provides for no further restrictions on how wireless carriers are to  
3 be counted.<sup>6</sup>  
4

5 **(2) WHILE CLEC LINE COUNT CHANGES ARE NOT RELEVANT, AT&T**  
6 **MISSOURI CONTINUES TO LOSE ACCESS LINES**

7 **Q. OPC AND THE STAFF HAVE PRESENTED INFORMATION ON**  
8 **CHANGES IN CLEC LINE COUNTS. IS THIS INFORMATION**  
9 **RELEVANT IN THIS CASE?**

10 A. No. The law simply requires the Commission to count the number of providers in  
11 the exchange to ensure there are two or more providers.<sup>7</sup>  
12

13 **Q. NONETHELESS, HAVE AT&T MISSOURI'S ACCESS LINES BEEN**  
14 **DECLINING?**

15 A. Yes. Mr. Van Eschen's schedules 5 and 6 show that CLEC lines have  
16 increased in some exchanges and decreased in others. This is indicative of  
17 a competitive market where customers are choosing between providers  
18 and relative customer counts within the market will vary over time. It is  
19 also indicative of the decline in traditional wireline telephone usage as  
20 customers continue to replace traditional wireline usage with other  
21 services. What Mr. Van Eschen's testimony does not show, however, is

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<sup>6</sup> Section 392.245.5(1).

<sup>7</sup> Section 392.245.5.

1           that AT&T Missouri's lines continue to decline. Over the time period  
2           highlighted in Staff's testimony (December 2004 to December 2005),  
3           AT&T Missouri lost over 84,000 access lines.  
4

5   **(3) THERE ARE ADDITIONAL AT&T MISSOURI EXCHANGES BEYOND**  
6   **THOSE STAFF IDENTIFIES THAT MEET THE 30 DAY CRITERIA**

7   **Q. DOES STAFF IDENTIFY EXCHANGES THAT WERE PREVIOUSLY**  
8   **GRANTED COMPETITIVE CLASSIFICATION UNDER THE 60 DAY**  
9   **CRITERIA THAT WOULD NOW MEET THE 30 DAY CRITERIA?**

10   A. Yes. Mr. Van Eschen's Schedule 1 indicates that 15 out of the 51 residential  
11       exchanges that qualified under the 60 day criteria would now meet the 30 day  
12       criteria. Additionally, Mr. Van Eschen's Schedule 2 indicates that 23 out of the  
13       30 business exchanges that qualified under the 60 day criteria would now meet  
14       the 30 day criteria.  
15

16   **Q. DID YOU PRESENT EVIDENCE THAT ADDITIONAL 60 DAY**  
17   **EXCHANGES, BEYOND THOSE IDENTIFIED BY STAFF, ALSO**  
18   **WOULD QUALIFY UNDER THE 30 DAY CRITERIA?**

19   A. Yes. Unruh Schedule 2(HC) and Unruh Schedule 3(HC) from my rebuttal  
20       testimony demonstrates that at least 27 of the 51 residential exchanges and at least  
21       27 of the 30 business exchanges previously granted competitive classification  
22       under the 60 day track would now appear to qualify under the 30 day track.

1

2 **SUMMARY**

3 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

4 A. I concur with Staff's general conclusion that competitive classification should be  
5 confirmed in all of AT&T Missouri's competitively classified exchanges. Staff  
6 has provided sufficient evidence that the competitive criteria continue to exist in  
7 each of AT&T Missouri's exchanges.

8

9 For clarification, I explained that while the law does not require wireless carriers  
10 to have local telephone numbers, wireless carriers nonetheless have the ability to  
11 port AT&T Missouri's telephone numbers in all AT&T Missouri exchanges,  
12 including the few exchanges where wireless carriers may not have directly  
13 assigned telephone numbers. In any event, there are more than a sufficient  
14 number of CLECs operating in AT&T Missouri's exchanges to confirm  
15 competitive classification even without using a wireless carrier. In response to  
16 Staff's testimony that CLECs have both gains and losses in the market, I noted  
17 that AT&T Missouri has experienced access line losses and this data reflects the  
18 general decline of wireline usage and customers' exercise of choice. Finally, I  
19 noted that there are even more exchanges than those identified by Staff that now  
20 qualify for competitive classification under the 30 day track.

21

22 It is clear from the information presented in this case that there is sufficient  
23 evidence to confirm competitive classification. OPC has presented no evidence to



1 the contrary. OPC's efforts to revive the old "effective competition" statute must  
2 be ignored. Moreover, OPC's claim that competitive classification is contrary to  
3 the public interest is not relevant in this case where the Commission is simply to  
4 confirm whether or not the competitive criteria continue to exist. Even if the  
5 public interest standard were relevant, OPC has not presented sufficient evidence  
6 that competitive classification is contrary to the public interest. The Commission  
7 should confirm the competitive classification for all of AT&T Missouri's  
8 competitively classified exchanges.

9  
10 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

11 **A. Yes.**