

2345 GRAND BOULEVARD  
SUITE 2500  
KANSAS CITY, MISSOURI 64108-2684  
816-292-2000, FAX 816-292-2001



1050/40 CORPORATE WOODS  
9401 INDIAN CREEK PARKWAY  
OVERLAND PARK, KANSAS 66210-2007  
816-292-2000, FAX 913-451-0875

November 24, 1998

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

FILED

NOV 24 1998

Missouri Public  
Service Commission

Re: Case No. TO-99-227

Dear Judge Roberts:

Attached for filing with the Commission is the original and fifteen (15) copies of AT&T Communications of the Southwest, Inc.'s Application to Intervene and Motion for Entry of Procedural Schedule in the above referenced case.

Please call me on 635-1320 you have any questions. Thank you for your assistance in this matter.

Sincerely,

LATHROP & GAGE

By: Paul S. DeFord (k1)  
Paul S. DeFord

Enc.

cc: All Parties of Record

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Missouri Public  
Service Commission

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

Application of Southwestern Bell Telephone )  
Company to Provide Notice of Intent to File an )  
Application for Authorization to Provide In-Region ) Case No. TO-99-227  
InterLATA Services Originating in Missouri )  
Pursuant to Section 271 of the Telecommunications )  
Act of 1996 )

**APPLICATION TO INTERVENE AND MOTION FOR ENTRY  
OF PROCEDURAL SCHEDULE**

COMES NOW AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.,  
TCG ST. LOUIS, INC. and TCG KANSAS CITY, INC. all AT&T companies, (hereafter  
collectively "AT&T") pursuant to 4 CSR 240-2.075(4)(D) of the Missouri Public Service  
Commission ("MoPSC") and in support of this Application to Intervene and Motion for  
Entry of Procedural Schedule would show as follows:

1. AT&T Communications of the Southwest, Inc. is a competitive  
interexchange telecommunications company duly incorporated and existing under and by  
virtue of the laws of the State of Delaware, authorized to do business in the State of  
Missouri as a foreign corporation. AT&T's principal Missouri offices are located at 1100  
Walnut, Kansas City, Missouri 64106. AT&T is an authorized provider of intrastate  
interexchange telecommunications services in Missouri under authority granted and  
tariffs approved by the Commission, as well as an authorized provider of interstate  
interexchange telecommunications services under a certificate granted and tariffs  
approved by the Federal Communications Commission. AT&T has been granted

authority to provide local exchange service and basic local exchange service in portions of Missouri. (Mo PSC Case No. TA 96-322).

2. TCG St. Louis, Inc. is a competitive interexchange telecommunications company that currently holds Certificate of Service Authority to provide intrastate interexchange and local exchange telecommunications service in the State of Missouri. TCG's principal Missouri offices are located at 1 City Place Drive, St. Louis, Missouri 63141. TCG holds Certificate of Service Authority to provide basic local exchange service in the 314 area of SWBT's service territory. (Mo PSC Case No. TA-96-345).

3. TCG Kansas City, Inc. is a competitive interexchange telecommunications company that currently holds Certificate of Service Authority to provide intrastate interexchange and local exchange telecommunications service in the State of Missouri. TCG's principal Missouri offices are located at 1111 Main Street, Suite 300, Kansas City, Missouri 64105. TCG holds Certificate of Service Authority to provide basic local exchange service in SWBT's service territory. (Mo PSC Case No. TA-98-253).

4. On August 9, 1996, MCI Telecommunications Corporation ("MCI") filed a Petition requesting the Commission to commence an investigatory proceeding to gather information and consider matters relevant to issues arising under Section 271 of the Federal Telecommunications Act of 1996. *See In the Matter of the Petition of MCI Telecommunications Corporation for an Investigation Under Section 271 of the Telecommunications Act of 1996*, Case No. TO-97-56. AT&T had been granted intervention in Case No. TO-97-56.

5. On September 25, 1997, the MoPSC entered an Order Granting MCI's Motion for Advance Notice in Case No. TO-97-56. That Order required "SWBT to

advise this Commission and the parties to this case, by means of an appropriate pleading, 120 days before it files its application with the FCC to provide in-region, interLATA telecommunications services in Missouri.” Order at p. 4. That Order further required that “[c]oncurrently with this pleading, SWBT shall file direct testimony in support of its application.” Id. The MoPSC clarified that once “SWBT has given notice and filed direct testimony, the Commission will set a date for the filing of rebuttal testimony and an evidentiary hearing, and other procedural dates as required.” Id.

6. On the afternoon of November 20, 1998, SWBT apparently filed a draft of its application for interLATA authority with the MoPSC. SWBT did not file the draft application in the previously established docket, Case No. TO-97-56, nor did it provide notice of its filing to the parties in Case No. TO-97-56 as required by the MoPSC’s September 25, 1997 Order. AT&T has not yet been provided a copy of SWBT’s November 20, 1998 filing, but has on its own initiative contacted attorneys for SWBT in an attempt to obtain a copy. SWBT’s tactics have effectively delayed AT&T’s and other interested parties’ opportunity to review SWBT’s filing by a week because of the upcoming Thanksgiving holidays.

7. AT&T opposes SWBT’s application for interLATA authority in Missouri because SWBT has not yet complied with the requirements of Section 271 of the federal Act, as has been repeatedly demonstrated in the Section 271 proceedings SWBT has initiated in the other states it serves. AT&T’s interest, as a competitive interexchange telecommunications company and as a prospective provider of local exchange telecommunications services in Missouri, are different from that of the general public. In addition, AT&T’s intervention in this proceeding is in the public interest because of

information it has concerning the issues relevant to the Section 271 proceeding, AT&T's expertise in the telecommunications industry, and AT&T's interest in enhancing competition.

8. AT&T believes it has information which will assist the Commission in providing its recommendation to the FCC on SWBT's Section 271 application.

9. All communications and pleadings in this docket should be directed to:

Paul S. DeFord  
Lathrop & Gage L.C.  
2345 Grand Boulevard  
Kansas City, MO 64108

Michelle Bourianoff  
AT&T Communications of the Southwest, Inc.  
919 Congress, Suite 900  
Austin, Texas 78701  
(512)370-1083 (ph.)  
(512)370-2096 (fax)

10. AT&T also moves for entry of a procedural schedule, as contemplated by the MoPSC in the September 25, 1997 Order in Case No. TO-97-56. AT&T suggests that the procedural schedule comply with the following deadlines:

November 23, 1998 (117 days prior to SWBT filing an application with the FCC)	Discovery may begin and depositions may be scheduled. Each party, with the exception of Staff and the Office of Public Counsel, shall be limited to 50 data requests on SWBT or Staff. SWBT may file data requests on the other parties under the same limitation. All discovery shall be due within 14 business days of receipt. The last day to submit data requests will be February 1, 1998.
January 25, 1998 (54 days prior to SWBT filing an application with the FCC)	Parties may file rebuttal testimony and/or written comments regarding SWBT's Section 271 filing and direct testimony

February 1, 1998 (47 days prior to SWBT filing an application with the FCC)	Participants exchange witness lists
February 8, 1998 (40 days prior to SWBT filing an application with the FCC)	Last day for depositions.
February 15, 1998 (33 days prior to SWBT filing an application with the FCC)	Pre-hearing conference
February 22, 1998 (26 days prior to SWBT filing an application with the FCC)	Evidentiary hearing before Missouri Public Service Commission
March 8, 1998 (12 days prior to SWBT filing an application with the FCC)	Parties may file post-hearing briefs
March 19, 1998 (1 day prior to SWBT filing an application with the FCC)	Commission order issued.
March 20, 1998	On or within 30 days after this date SWBT may file with FCC.

Because of SWBT's tactics in unnecessarily delaying the opportunity of third parties to effectively review this filing until after Thanksgiving week and in order to provide the parties with a reasonable opportunity to digest the substantial filing and to engage in necessary discovery, AT&T respectfully urges that the comments and rebuttal affidavits of the parties not be accelerated from the January 25, 1999 date set out in the proposed schedule.<sup>1</sup>

11. Also, in light of the Commission's previous order regarding the filing of SWBT pre-filed testimony, followed by the setting of a date for the filing of intervenor rebuttal testimony, AT&T has not proposed dates for SWBT to file surrebuttal and for intervenors to file reply testimony. AT&T urges the Commission either to limit pre-filed testimony to the two rounds originally contemplated (SWBT direct and Intervenor rebuttal) or that any opportunity provided for SWBT to file surrebuttal be joined with an opportunity for Intervenor to file reply testimony. In those jurisdictions where SWBT

has been allowed to submit surrebuttal testimony without an opportunity for Intervenor to reply, SWBT's has included in its surrebuttal testimony volumes of materials that should have been included in direct testimony. The consequence of allowing the round of SWBT surrebuttal without an opportunity to reply is that the record is underdeveloped on matters that could have been addressed by Intervenor if the matters had been included in SWBT direct testimony.

12. The procedural schedule should also establish that the evidentiary hearing shall be in a panel presentation format on an issue-by-issue basis. SWBT's panel of witnesses on a particular issue shall be presented and subjected to cross-examination, followed by presentation and cross-examination of a panel composed of CLEC witnesses. Following cross-examination of both panels, a combined panel of SWBT and CLEC witnesses shall be made available for cross-examination by Staff, OPC and Commissioners. Time limits for cross-examination shall be discussed at the prehearing conference.

13. AT&T would suggest that in light of its proposed procedural schedule that allows parties the opportunity to conduct discovery, discovery ordered by the MoPSC is not necessary. If the MoPSC determines that the requests for information provided by SWBT would be useful to the Commission in conducting this proceeding, AT&T would also suggest that the MoPSC propound discovery requests upon SWBT. A model set of questions, which were used by the Texas Public Utility Commission in conducting its state 271 proceeding, is attached hereto as Attachment 1.

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<sup>1</sup> AT&T would also note that accelerating the date for filing testimony prior to January 25, 1999 might lead to a situation in which testimony is stale or out of date by the time of the hearing or the date for

14. With regard to SWBT's suggestion that every certificated CLEC be required to complete an implementation schedule, no such requirement is contemplated by the federal Act in conjunction with the review of a section 271 application. SWBT's attempt to obtain highly confidential and proprietary information and competitively sensitive market information as a prerequisite to participation from intervenors under the guise of collecting information for the MoPSC's use not only is improper, but is likely to chill participation of CLECs in this proceeding.

WHEREFORE, AT&T respectfully requests the Commission enter an Order granting AT&T's Application to Intervene and entering an Order granting the Procedural Schedule as described above.

Respectfully submitted,

LATHROP & GAGE

  
Paul S. DeFord #29509  
Lathrop & Gage  
2345 Grand Boulevard  
Suite 2500  
Kansas City, MO 64108-2684

Michelle Bourianoff  
AT&T, Senior Attorney  
919 Congress Ave.  
Austin, TX 78701



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- 1-LL Please state the identity of unaffiliated local service providers (LSPs) or other unaffiliated entities that have requested interconnection or unbundled elements from Southwestern Bell Telephone Co. (SWBT) or the ability to resell SWBT's services as of today's date; as to each such request, please state the types of interconnection, unbundled elements, or services requested, and the date each request was made; please also state the identity of LSPs or other unaffiliated entities with which you have entered into binding agreements; please provide the Public Utility Commission (PUC) docket number for each agreement, and indicate whether the agreement was approved by the PUC.
- 2-JE With reference to each agreement set forth in response to 1-LL for which interconnection or unbundled elements was requested, please provide the following:
- a) the date interconnection occurred;
  - b) the specific point(s) of interconnection;
  - c) the method(s) of interconnection; and,
  - d) state whether the rates, terms, and conditions for the interconnection agreement were negotiated or arbitrated.
- 3-LL With regard to all LSPs or other unaffiliated entities that have requested interconnection, access, or the ability to resell SWBT's services but with whom SWBT has not entered into a binding agreement, please state the status of the negotiations or arbitrations, and state the unresolved issues in each of those negotiations or arbitrations.
- 4-LL Please provide a copy of all of SWBT's statements of terms and conditions filed and approved pursuant to Section 252 (f)(1) of the Federal Telecommunications Act of 1996 (FTA96).
- 5-LL As to each of the following lines or services, please state the total number of lines or services, the number of lines or services served by SWBT, and the number of lines or services served by LSPs on both a statewide and per-exchange basis within SWBT territory:
- a) single party residential access lines;
  - b) single party business access lines;
  - c) PBX trunks;
  - d) Plexar lines;
  - e) voice-grade private lines;
  - f) DS-1 private lines;
  - g) private lines higher than a DS-1;
  - h) Integrated Services Digital Network-Basic Rate Interface (ISDN-BRI) lines;

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- i) Integrated Services Digital Network--Primary Rate Interface (ISDN-PRI) lines; and,
- j) switched 56 Kilobits per second (Kbps) lines.

6-LL

Please state the following information on both a statewide and per-exchange basis within SWBT territory:

- a) the number of residential subscribers served by SWBT;
- b) the number of business subscribers served by SWBT;
- c) the number of residential special access customers served by SWBT;
- d) the number of business special access customers served by SWBT;
- e) the number of residential switched access customers served by SWBT; and,
- f) the number of business switched access customers served by SWBT.

7-LL

Please state the following information as of December 31, 1996:

- a) the total amount of gross revenue derived by SWBT in 1996 from providing telephone service to residential customers;
- b) the total amount of gross revenue derived by SWBT in 1996 from providing telephone service to business customers;
- c) the total amount of gross revenue derived by SWBT in 1996 from providing intraLATA toll;
- d) the total amount of gross revenue derived by SWBT in 1996 from access charges; and,
- e) the total amount of gross revenues derived by SWBT in 1996 from any other local exchange services.

8-LL

Please state the number and location of SWBT switches in Texas that are connected to the local loops served by LSPs.

9-RB

Please provide any documents including reports, studies, or analyses created since January 1, 1996, that:

- a) contain data on market shares of SWBT and LSPs, competitors, or potential competitors;
- b) compare volumes of traffic, revenues, or facilities of SWBT and LSPs, competitors, or potential competitors; and,
- c) evaluate the likely entry, success or rate of growth of LSPs, competitors or potential competitors.

10-RB

Please provide all internal SWBT forecasts, as well as those provided to outside persons or entities such as investor groups and investor analysts, analyzing the impact of competition in the local exchange market on SWBT's operations, revenues, and earnings.

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- 11-RB Please provide any documents including reports, studies, or analyses created since January 1, 1996, regarding SWBT's wholesale pricing strategies and/or the effect of SWBT's wholesale offerings on its retail services.
- 12-RB Please provide information on the percentage change since January 1, 1996 in average retail prices within Texas for local exchange business services and local exchange residential services.
- 13-DR Please provide information regarding complaints that have been filed to date against or about SWBT with SWBT, PUC, the Federal Communications Commission, or any other governmental authority by an LSP, carrier, competitor, or other unaffiliated entity that has requested interconnection, access, or the ability to resell SWBT services; please state a description of the issue(s) in dispute in each case, and when, where, and by whom the complaint was filed; please state the current status of each complaint.
- 14-JE Please state the points of interconnection available to LSPs on SWBT's network.
- 15-JE Please state whether physical and virtual collocation are available at SWBT's premises, including central office, tandem office, controlled environmental vaults, huts, and cabinets. If so, please state the location(s) at which such collocation exist(s) today, also state the price, including all recurring and nonrecurring charges, for physical and virtual collocation, and the method used to determine the price.
- 16-JE Please state the terms upon which SWBT provides physical and virtual collocation, including the limitations SWBT imposes upon the type of equipment that LSPs may collocate, the reasons for such limitations, and the effect the limitations have on the quality and cost of service that another LSP can offer.
- 17-JE To the extent not already discussed, please state the conditions or limitations SWBT imposes on the types of services that other carriers may provide using collocated equipment.
- 18-JE Please set forth in detail SWBT's record in responding to requests regarding collocation, including provisioning intervals, availability of space, and warehousing of space.
- 19-JE Please list the LSPs that have requested physical or virtual collocation, state the number of times each LSP has requested physical or virtual collocation, and identify with specificity the locations in which such collocation was sought.
- 20-JE Please list the LSPs to whom SWBT has provided physical or virtual collocation and identify with specificity the locations in which such collocation was provided. Further identify all locations in which SWBT has refused to provide collocation to requesting LSPs.
- 21-JE To the extent not already discussed, please explain in detail the pricing methodology used by SWBT to establish the rates for interconnection.

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- 22-JE Please provide a list of all network elements available for interconnection, and state whether such elements are available to all LSPs seeking an interconnection agreement with SWBT.
- 23-JE Please state the network elements SWBT has agreed to unbundle.
- 24-JE Please state whether SWBT has received requests from LSPs for meet point arrangements; if so, please provide a list of all LSPs who made such a request and state whether SWBT has denied any such requests; please state the requirements and conditions for such arrangements.
- 25-NVS With reference to the following residential unbundled loops, state the number of requests SWBT has received from LSPs seeking residential unbundled loops and state the number of each such loop sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following residential unbundled loops sold or leased. State all information on a statewide and per-exchange basis:
- a) 2-wire analog residential unbundled loops;
  - b) residential unbundled loops capable of handling ISDN-BRI;
  - c) residential unbundled loops capable of handling ISDN-PRI;
  - d) residential unbundled loops capable of handling Asymmetric Digital Subscriber Line (ADSL); and,
  - e) residential unbundled loops capable of handling High-Speed Digital Subscriber Line (HDSL).
- 26-NVS With reference to the following business unbundled loops, state the number of requests SWBT has received from LSPs seeking business unbundled loops and state the number of each such loop sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following business unbundled loops sold or leased. State all information on a statewide and per-exchange basis:
- a) 2-wire analog business unbundled loops;
  - b) business unbundled loops capable of handling ISDN-BRI;
  - c) business unbundled loops capable of handling ISDN-PRI;
  - d) business unbundled loops capable of handling ADSL; and,
  - e) business unbundled loops capable of handling HDSL.
- 27-NVS With reference to the following residential analog switch ports, state the number of requests SWBT has received from LSPs seeking residential analog switch ports and state the number of each such switch port sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following residential analog switch ports sold or leased. State all information on a statewide and per-exchange basis:

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- a) the line-side of a local switch; and,
- b) the trunk-side of a local switch.

28-NVS

With reference to the following business analog switch ports, state the number of requests SWBT has received from LSPs seeking business analog switch ports and state the number of each such switch port sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following business analog switch ports sold or leased. State all information on a statewide and per-exchange basis:

- a) the line-side of a local switch; and,
- b) the trunk-side of a local switch.

29-NVS

With reference to the following residential digital switch ports, state the number of requests SWBT has received from LSPs seeking residential digital switch ports and state the number of each such switch port sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following residential digital switch ports sold or leased. State all information on a statewide and per-exchange basis:

- a) the line-side of a local switch; and,
- b) the trunk-side of a local switch.

30-NVS

With reference to the following business digital switch ports, state the number of requests SWBT has received from LSPs seeking business digital switch ports and state the number of each such switch port sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following business digital switch ports sold or leased. State all information on a statewide and per-exchange basis:

- a) the line-side of a local switch; and,
- b) the trunk-side of a local switch.

31-NVS

State the number of requests SWBT has received from LSPs seeking residential common transport segments (equivalent voice grade channels) and state the number of residential common transport segments (equivalent voice grade channels) sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of residential analog switch ports (line side). State all information on a statewide and per-exchange basis.

32-NVS

State the number of requests SWBT has received from LSPs seeking business common transport segments (equivalent voice grade channels) and state the number of business common transport segments (equivalent voice grade channels) sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of business analog switch ports (line side). State all information on a statewide and per-exchange basis.

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33-NVS

With reference to the following network elements, state the number of requests SWBT has received from LSPs seeking each element and state the number of each such element sold or leased to LSPs by SWBT. Provide a list of the LSPs to whom the sale or lease was made. For each LSP, state the total number of the following elements sold or leased. State all information on a statewide and per-exchange basis:

- a) central office cross-connect points;
- b) out-of-band signaling transfer points;
- c) network interface device;
- d) interoffice transmission facilities;
- e) signaling networks;
- f) operations support system functions;
- g) operator services facilities; and,
- h) directory assistance facilities.

34-JE

With reference to each of the unbundled elements set forth in 25-NVS through 33-NVS, please state the following:

- a) the methodology employed to determine the price of each unbundled element;
- b) the average interval between the time an LSP makes a request for each unbundled element until SWBT provides the unbundled element;
- c) whether SWBT has received any repair or operational requests regarding these unbundled elements; if so, please identify the actual response interval to resolve the repair or operational request;
- d) whether any installation or repair requests have been delayed due to inability to provide the quantity of the element requested; if so, please identify the element, the LSP, and the time interval between the request and the provision of service;
- e) the provisioning, testing, and cut over procedure established by SWBT to provide unbundled network elements;
- f) whether the quality of the unbundled network elements, as well as the quality of the access to such elements, is at least equal in quality to what SWBT provides itself; if the answer is no, please provide a full explanation;
- g) whether the quality of the unbundled network elements, as well as the quality of the access to such elements, is the same for all LSPs requesting access to that network element; if the answer is no, please provide a full explanation;
- h) whether, upon request by an LSP, SWBT performs the functions necessary to combine unbundled network elements in a technically feasible manner that would not impair the ability of other LSPs to obtain access to unbundled network

elements or to interconnect with SWBT's network; if the answer is no, please provide a full explanation;

i) the limitations, restrictions, or requirements that SWBT places on requests for or use of unbundled network elements; and,

j) whether SWBT has refused to provide access to any of the unbundled network elements, and if so, the LSP(s) to whom such refusal was given.

35-NVS Please describe the ordering process an LSP must follow in order to obtain unbundled network elements from SWBT.

36-NVS If not previously provided in response to a request herein, please provide a list and number of exchanges in which SWBT offers unbundled network elements.

37-JE Please list the LSPs that have requested access to SWBT's poles, ducts, conduits, and rights-of-way; please list the LSPs to whom SWBT has provided access to poles, ducts, conduits, and rights-of-way; please identify the exchanges in which the LSPs have access to poles, ducts, conduits and rights-of-way.

38-JE Please describe the process an LSP must follow in order to obtain access to SWBT's poles, ducts, conduits, and rights-of-way; please state whether the process is identical for all LSPs.

39-JE Please identify the terms and conditions upon which access to poles, ducts, conduits, and rights-of-way is granted by SWBT; state all rates associated with access to SWBT's poles, ducts, conduits, and rights-of-way and provide the associated cost basis of the rates.

40-NVS Please describe the terms upon which SWBT provides access to its databases. Please provide a list of databases to which SWBT provides access.

41-NVS Please list the LSPs that have requested access to SWBT's databases and associated signaling necessary for routing and completion of calls; please list the LSPs that have purchased or leased access to SWBT databases and associated signaling necessary for routing and completion of calls; please identify the exchanges in which the LSPs have access to databases and associated signaling.

42-NVS Please provide information regarding mediation mechanisms that have been established to provide access to Service Management System (SMS) and Service Control Environment (SCE) for the creation and deployment of Advanced Intelligent Network (AIN) services.

43-LL Please list the LSPs that have requested operator call completion services from SWBT; please list the LSPs to whom SWBT provides operator call completion services; please identify the exchanges in which SWBT provides operator call completion services.

44-LL Describe the general terms and conditions under which SWBT provides operator call completion services to LSPs' customers.

45-LL With regard to the operator call completion services provided by SWBT to the customers of LSPs, please state the following:

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- a) the duration of time which passes from the time the customer requests an operator call completion service to the time the operator call completion service is provided;
  - b) the options available for call completion;
  - c) announcement, by the operator, of options available for call completion;
  - d) whether the LSP for whom the operator call completion is provided is identified by the operator; and,
  - e) whether access to 911 service or Enhanced 911 (E911) service is provided.
- 46-LL Please describe the general terms and conditions under which SWBT provides operator call completion services to SWBT customers.
- 47-LL With regard to the operator call completion services provided by SWBT to its own customers, please state the following:
- a) the duration of time which passes from the time the customer requests an operator call completion service to the time the operator call completion service is provided;
  - b) the options available for call completion;
  - c) announcement, by the operator, of options available for call completion;
  - d) whether SWBT is identified by the operator at the inception of the call; and,
  - e) whether access to 911 service or E911 service is provided.
- 48-LL State whether SWBT, or an affiliate of SWBT, has published white page directory listings of customers of LSPs. If so, please identify the locales and dates for such listings. If not, state the earliest date SWBT, or an affiliate of SWBT, expects to publish white page directories that include the listing information of customers of LSPs.
- 49-LL State whether the customers of LSPs receive white page directories on the same date and in the same manner as SWBT customers. If not, please identify any aspect of white page directory pricing, distribution, or content that is different from SWBT customers.
- 50-DA Please describe the general terms and conditions under which SWBT provides 911 and E911 to SWBT customers.
- 51-DA Please describe the general terms and conditions under which SWBT provides 911 and E911 to customers of LSPs.
- 52-DA State whether and to what extent any LSPs have access to an automated process of updating the Automated Location Identification (ALI) database.
- 53-DA State whether and to what extent any LSPs have received electronic access to the Master Street Address Guide (MSAG) from any of the entities to which SWBT is the 911 provider.



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- 54-DA State whether and to what extent LSPs have the option of transporting their customers' 911 calls directly to the Public Safety Answering Point (PSAP) in any of the regions for which SWBT is the 911 provider.
- 55-LL Please list the LSPs that have requested directory assistance services from SWBT; please list the LSPs to whom SWBT provides directory assistance services; please identify the exchanges in which SWBT provides directory assistance services.
- 56-AN Please describe the general terms and conditions under which SWBT provides directory assistance to customers of SWBT.
- 57-AN With regard to the directory assistance services provided by SWBT to its own customers, please state the following:
- a) the duration of time which passes from the time the customer requests a directory assistance service to the time the directory assistance service is provided; and,
  - b) the options available for directory assistance and call completion.
- 58-AN Please describe the general terms and conditions under which SWBT provides directory assistance to customers of LSPs.
- 59-AN With regard to the directory assistance services provided by SWBT to the customers of LSPs, please state the following:
- a) the duration of time which passes from the time the customer requests a directory assistance service to the time the directory assistance service is provided; and,
  - b) the options available for directory assistance and call completion;
  - c) whether the LSP for whom the directory assistance service is provided is identified.
- 60-JC State whether, at the request of an LSP, SWBT routes operator call completion and directory assistance calls to the LSP's own facilities.
- 61-NVS Please indicate the steps SWBT has taken, if any, to provide local dialing parity.
- 62-NVS Please state the percentage of switches owned by SWBT that are providing dialing parity:
- a) for local calls;
  - b) for intraLATA toll calls; and
  - c) for both local calls and intraLATA toll calls.
- 63-NVS Please state the terms and conditions upon which local dialing parity is provided to LSPs.
- 64-DF Please describe in detail SWBT's current role as number administrator for the state of Texas.

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- 65-DF State the procedure used by the number administrator to determine who gets which number.
- 66-DF State the relationship between SWBT and Bellcore and set forth the terms and conditions concerning number administration.
- 68-DF State the date North American Numbering Council (NANC) is scheduled to select a new national number administrator. If an administrator is selected other than Bellcore, state the date such administrator would take over number administration. State also how a new national number administrator would affect SWBT's role as the number administrator for Texas.
- 69-DF State the standards SWBT currently employs in managing the limitations in numbering resources, such as NXX freezes.
- 70-JT State the extent to which SWBT is providing interim number portability and describe the physical characteristics of the system.
- 71-JT State the pricing methodology used by SWBT to determine the charges for the type of number portability provided.
- 72-JF State whether differences in quality exist between those numbers that are ported on an interim basis and those that remain serviced by SWBT. If differences do exist, please explain these differences and why they exist.
- 73-JF State whether optional calling features, such as caller identification, call forwarding, etc. operate on numbers that are ported on an interim basis the same as they do on numbers that remain with SWBT. If no, please explain why not and what steps would need to be taken in order for these features to operate with ported numbers the same as they do with numbers that remain serviced by SWBT.
- 74-JF State whether 911 services operate with numbers ported on an interim basis the same as they do with numbers that remain with SWBT. If not, please explain why not and what steps would need to be taken in order for 911 to operate with ported numbers the same as they do with numbers that remain serviced by SWBT.
- 75-JF State whether and the extent to which SWBT has terms in its interconnection agreements with LSPs that address interim number portability. If yes, please explain.
- 76-JF State the steps SWBT has taken, if any, toward implementation of long-term service provider number portability (SPNP) in Texas. State when SWBT will implement SPNP in Texas. State the steps SWBT must take before SPNP can be implemented in Texas.
- 77-JF State whether optional calling features, such as caller identification, call forwarding, etc. operate on numbers that are ported on a SPNP basis the same as they do with numbers that remain with SWBT. If no, please explain why not and what steps would need to be taken in order for these features to operate with ported numbers the same as they do with numbers that remain serviced by SWBT.

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- 78-JF State whether 911 services operate with numbers ported on a permanent basis the same as they do with numbers that remain with SWBT. If not, please explain why not and what steps would need to be taken in order for 911 to operate with ported numbers the same as they do with numbers that remain serviced by SWBT.
- 79-JF State whether the same terms and conditions that are available to LSPs for interim number portability will be available to LSPs for SPNP. If not, please explain the difference and why there will be a difference.
- 80-JC State whether SWBT presently offers to LSPs for flat-rate resale all telecommunications services available from its intrastate tariffs.
- 81-JC State the terms upon which SWBT provides such telecommunications services for flat-rate resale, including the percentage discount offered to LSPs for resold services.
- 82-JC State any and all restrictions and limitations SWBT imposes on the resale of its services.
- 83-JC For 1996, state the annual gross revenue received by SWBT from flat-rate resale of telecommunications services.
- 84-JC State the average interval from the time any service is ordered for flat-rate resale and the establishment of the service.
- 85-JC State the average interval from the time a customer requests a transfer from one interexchange carrier to another and the time such change is made by SWBT.
- 86-JC State the average interval from the time a request is made to transfer local exchange service from SWBT to an LSP and the time such change is made by SWBT.
- 87-JC State the actual response interval to resolve any repair or outage reported by an LSP or a customer of an LSP.
- 88-JC State whether any installation requests have been delayed due to inability to provide the quantity of the resold services requested. If so, please identify the services, the LSP, and time interval elapsed between the request and the provision of the service.
- 89-JC State whether the services made available by SWBT for flat-rate resale are of at least equal quality to that provided by SWBT to its own customers.
- 90-JC State the number of requests for flat-rate resale and unbundled network elements that SWBT can currently process and implement in one 24-hour period and in a one-week long period (7 calendar days).
- 91-JC State whether and to what extent SWBT is making services available for resale to LSPs on the same terms previously offered to its own customers; if not, please state which services have been withdrawn or changed with respect to resale.

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- 92-JC State whether SWBT is making promotional offerings of 90 days or less available to LSPs at the promotional price; state the terms, including price, upon which such offerings are made. If not, please state in detail the reason.
- 93-JC State whether SWBT is making promotional offerings of more than 90 days available to LSPs at a wholesale discount according to the specific percent discount for the service as applied directly to the value of the promotional rate; state the terms, including price, upon which such offerings are made. If not, please state in detail the reason.
- 94-JF State whether SWBT has taken all of the operational and technical steps necessary to fully implement each of the requirements of the competitive checklist ("the checklist") set out in Section 271 of FTA96.
- 95-JF For each requirement listed in the checklist, please list the operational and/or technical steps taken to implement the requirement. If a requirement has not yet been fully satisfied, please explain what steps have been taken to date and what steps remain to be taken. If a requirement has not yet been fully satisfied, please indicate when SWBT expects to have the requirement fully satisfied.
- 96-JF State whether SWBT has made specific operational or technical changes or added to its network and/or provisioning systems to implement the requirements of the checklist. State the specific features that have been created and/or installed for this purpose. Please describe these features and explain why they are necessary for compliance with the checklist. State the specific capabilities that have been added to the existing network functions for this purpose. Please describe these capabilities and explain why they are necessary.
- 97-JF State whether SWBT has taken any steps beyond what is specifically required by the checklist in order to facilitate interconnection by companies seeking to provide services through interconnection with SWBT. Please explain what additional steps have been taken and why.
- 98-JF Please state whether the provisioning of in-region, interLATA service by SWBT would be consistent with the public interest, convenience, and necessity at this time; state the factors the PUC should consider in determining "public interest, convenience, and necessity."
- 99-JF State whether each interconnection agreement that SWBT has entered into provides for performance standards and penalties for failure to meet such standards with respect to the checklist. In addition to rescinding SWBT's ability to provide in-region interLATA service, please state any other means of assuring observance of the checklist once SWBT enters the interLATA market.
- 100-BLH Provide a complete discussion of how SWBT and Southwestern Bell Corp. (SWBC) plan to satisfy the "separate affiliate" requirement of Section 272 of FTA96.
- 101-BLH Provide a complete discussion of how SWBT and SWBC plan to satisfy the "safeguards" requirement of Section 272 of FTA96.

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- 102-BLH Please identify the separate affiliate SWBC will be using to provide interLATA toll.
- 103-BLH Please identify the officers and directors of the separate affiliate.
- 104-BLH Please identify the location of the separate affiliate and indicate where and how the separate affiliate will maintain its books, records, and accounts.
- 105-BLH Please state whether SWBT has co-signed any contract, or made any other arrangement with, or on behalf of, its separate affiliate that would allow a creditor to obtain access to SWBT's assets.
- 106-BLH Please provide all written contracts and agreements between SWBT and the affiliate, and SWBC and the affiliate.
- 107-BLH Please describe in detail the controls in place, if any, to prevent SWBT from providing the affiliate with preferential treatment related to procurement of goods, services, facilities, and information, or in the establishment of standards.

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- JE-108 Please submit data regarding call completion rates for calls originating on LSPs' network(s) and terminating with SWBT's customers.
- JE-109 Please submit data regarding call completion rates for calls originating on SWBT's network and terminating with LSPs' customers.
- JE-110 Please explain any differentials in the call completion rates between numbers JE-108 and JE-109 above. This explanation should include a primary cause for any call blocking and the size of the trunk groups experiencing the blockage.
- JE-111 In the event of blockage, please describe all alternate routing methods employed by SWBT for traffic designated for its own NXXs.
- JE-112 In the event of blockage, please describe alternate routing methods employed by SWBT for traffic designated for an LSP's NXXs.
- JE-113 Please explain any differentials in available alternate routing methods between what SWBT provides for itself and what SWBT provides for LSPs.
- NVS-114 Please state the extent to which an LSP can test Operational Support Services (OSS) provided by SWBT prior to entry into a comprehensive interconnection agreement.
- NVS-115 Please state the extent to which SWBT's OSS restricts an LSP's ability to execute resale and unbundled network element (UNE) orders. (e.g. size of input fields, number of changes that can be inputted into one local service request, etc.)
- NVS-116 Please list and describe all complaints SWBT has received concerning its provisioning of UNE's whether from the requesting LSP or the LSP's customer. This response should explain the status of the complaint or explain how the complaint was resolved.
- NVS-117 On an aggregate basis, for unbundled loops provisioned by SWBT, state the manner in which those loops were ordered, e.g., facsimile machine, LEX, EDI, etc.? For unbundled loops ordered through LEX or EDI, break down the aggregate number by requesting carrier.
- NVS-118 Describe the complete ordering process, from an LSP's preparation of a local service request (LSR) to SWBT's provisioning of services when an LSP orders residential basic local services, residential ISDN, and PLEXAR services using either a facsimile machine, EDI, or EASE. Compare this end-to-end process to the process used when SWBT provisions

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comparable retail services. This response should be updated as processes are modified and should include estimates for electronic flow-through.

- NVS-119 Describe the complete ordering process, from an LSP's preparation of an LSR to SWBT's provisioning of elements when an LSP orders a full UNE platform, a switch/port combination less than the full platform, or an unbundled loop using either a facsimile machine, LEX, EDI, or EASE. Compare this end-to-end process to the process used when SWBT provisions comparable retail services. This response should be updated as processes are modified and should include estimates for electronic flow-through.
- NVS-120 Describe all of your wholesale billing systems and processes.
- NVS-121 Describe any complaints you have received from LSPs or their customers concerning double-billing of customers.
- NVS-122 Describe any complaints you have received from LSPs concerning improper billing of LSPs.
- NVS-123 Please list all types of equipment that SWBT will not allow an LSP to physically and/or virtually collocate in SWBT's central office. This response should explain the basis for SWBT's refusal.
- DA-124 Please state the extent to which an LSP can obtain access to 911 and E911 services without entering into a comprehensive interconnection agreement.
- DA-125 For each LSP, if SWBT has provided 911 & E911 access and/or service, state whether SWBT provided it pursuant to an interconnection agreement. If not, please specify the LSP and identify the circumstances under which it was provided, including the time for negotiating service, the terms and conditions, and whether the service is provided pursuant to a tariff or contract.
- DA-126 Please describe SWBT's method of inputting customer information into the 911 & E911 database for: 1) SWBT customers, and 2) Non-SWBT end-users. In your response, please include the individual steps needed to input the customer information into the 911 & E911 database and amount of time required.
- DA-127 Please state the number and types of 911 & E911 database errors for: 1) SWBT customers, and 2) Non-SWBT end-users. Please state the percent of errors due to inaccurate data entry for each set of end-users.

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- DA-128 Please describe SWBT's process of error detection for the 911 & E911 database for: 1) SWBT customers, and 2) Non-SWBT end-users.
- DA-129 Please describe SWBT's internal error correction methods for the 911 & E911 database for: 1) SWBT customers, and 2) Non-SWBT end-users.
- DA-130 Please state the average amount of time between detecting 911 & E911 database errors and correcting those errors for: 1) SWBT customers, and 2) Non-SWBT end-users.
- DA-131 Please state and describe all formal complaints against SWBT concerning access to SWBT's 911 database. Please state how the complaint was resolved.
- DA-132 How many SWBT 911 trunks were deactivated in 1996, 1997, and 1998?
- DA-133 How many non-SWBT 911 trunks were deactivated in 1996, 1997, and 1998?
- DA-134 How many of the above referenced deactivations were unilateral actions by SWBT in nature? Please state the reason for each unilateral deactivation.
- DA-135 Which LSPs, if any, were given advance notice of the above-referenced deactivations? How far ahead in time were the LSPs notified?
- LL-136 Please state the extent to which an LSP can get its customer listings placed in SWBT's white page directory without entering into a comprehensive interconnection agreement.
- LL-137 Please describe any complaints SWBT has received from LSPs regarding the placement of LSP information in white page directories. This response should explain the status of the complaint or how the complaint was resolved.
- LL-138 Please describe the process by which SWBT determines whose advertisements (permanent or removable) are placed on the cover of the white page directories, (e.g. by competitive bidding). What methods, if any, are available for LSPs to place advertisements on the cover of the white page directory?
- AN-139 Please explain the process and timeline for transfer of numbering plan and code administration responsibility from SWBT to Lockheed Martin as the North American Numbering Plan Administrator (NANPA), including the beginning and ending date of the transfer period. Please provide a copy of



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documents specifying the responsibilities being transferred and the timing of the transfer.

- AN-140 State whether SWBT will provide support or assistance to the NANPA subsequent to the ending date of the transfer period. If yes, please describe the support or assistance.
- AN-141 Please explain the procedure SWBT uses to insure that SWBT does not receive preferential treatment in number assignments.
- AN-142 Please explain the standards and procedure used by SWBT for the assignment of partial NXX code numbers to other carriers, and how SWBT insures such assignments are made on a nondiscriminatory basis.
- AN-143 State whether SWBT intends to continue to offer interim number portability subsequent to the first phase implementation of permanent number portability, i.e., implementation of permanent number portability in the Houston MSA. If yes, please describe the basis and extent to which SWBT will continue to offer interim number portability.
- AN-144 State whether SWBT is in compliance with the permanent number portability implementation schedule imposed by the FCC. If not, please explain why SWBT is not in compliance, what steps SWBT is taking to implement permanent number portability, what waivers or deferrals SWBT has sought, and when SWBT will be in compliance with FCC requirements.
- AN-145 Please provide a copy of all filings, including tariffs and requests for waiver, relating to permanent number portability filed by SWBT with the FCC.
- AN-146 State whether SWBT will file a permanent number portability tariff with the Commission. If yes, please explain how charges will be incurred and to whom charges will be assessed for queries for permanent number portability, and state when SWBT plans to impose query charges.
- MT-147 Please state whether SWBT has established reciprocal compensation arrangements with LSPs for the transport and termination of telecommunications traffic. If so, do these arrangements provide for the mutual and reciprocal recovery by each carrier of costs associated with the transport and termination of calls originated on the network facilities of the other carrier?
- MT-148 Please state whether there is a cost basis for the reciprocal compensation arrangements. If so, are the compensation rates based on a reasonable approximation of the additional costs of terminating and transporting calls?

- MT-149 Do the terms and conditions of reciprocal compensation arrangements include mutual cost recover waivers, *i.e.*, bill and keep arrangements? If so, please describe the terms and conditions of such arrangements.
- MT-150 Please identify the rates, terms and conditions associated with the reciprocal compensation arrangements for the following categories of traffic (if applicable):
- a) Local Traffic;
  - b) Transit Traffic;
  - c) Optional Calling Area Traffic;
  - d) IntraLATA Interexchange Traffic;
  - e) InterLATA Interexchange Traffic;
  - f) FGA Traffic;
  - g) Cellular Traffic; and
  - h) other types of traffic.
- JC-151 With regard to ordering and provisioning *retail* services, please describe SWBT's method for tracking installations.
- JC-152 With regard to ordering and provisioning *resale* services, please describe SWBT's method for tracking installations.
- JC-153 Please submit data showing the average installation interval for SWBT's *retail* operations with regard to ordering and provisioning its retail services.
- JC-154 Please submit data showing the average installation interval with regard to ordering and provisioning *resale* services for competitive carriers.
- JC-155 Please submit data comparing the percentage of *retail* orders that are processed electronically and manually over SWBT's interface.
- JC-156 Please submit data comparing the percentage of *resale* orders that are processed electronically and manually over SWBT's interface.
- JC-157 Please explain any differentials between numbers JC-155 and JC-156, above.
- MT-158 Please state whether SWBT has performance standards and reporting requirements in place to monitor performance in interconnection agreements. Do SWBT performance monitoring measures include self-

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executing enforcement mechanisms to ensure compliance with performance standards?

- MT-159 Please state whether SWBT makes available to unaffiliated LSPs optional payment plans for up-front, non-recurring charges?
- MT-160 Please state whether SWBT is making available, pursuant to contract or otherwise, any individual interconnection arrangement, service, or network element provided under any interconnection agreement to any other requesting telecommunications carrier upon the same rates, terms, and conditions as those provided in the agreement.
- NVS-161 For each performance measure ordered by the commission in Docket No. 16226; Petition of AT&T Communications of the Southwest, Inc. for Compulsory Arbitration to Establish an Interconnection Agreement Between AT&T and Southwestern Bell Telephone Company, state the following:
- a) date SWBT began collecting the required information,
  - b) SWBT's performance under each of those measures on a month-by-month basis, and
  - c) SWBT's performance for its comparable retail services on a month-by-month basis.
- MT-162 Please provide a copy of SBC's Code of Business Conduct and any other written materials of SWBT or SBC that relate to company policies governing relationships between affiliates.

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NVS-162 Please complete the following table. If LSP orders are concentrated in particular geographic areas, please identify those areas on a separate sheet of paper.

The first of the month	Number of residential customers served via resale	Number of residential customers served via unbundled network elements	Number of residential customers served via facilities owned by the LSP or leased from an entity other than SWBT	Number of business customers served via resale	Number of business customers served via unbundled network elements	Number of business customers served via facilities owned by the LSP or leased from an entity other than SWBT
Nov. 1997						
Dec. 1997						
Jan. 1998						
Feb. 1998						
Mar. 1998						
April 1998						
May 1998						

MT-163 Please provide articles of incorporation or association and certificates of incorporation for SWBT and the separate affiliate SBC will be using to provide interLATA telecommunications services.

MT-164 Please provide information detailing the corporate structure of SBC which describes the relationships between and among SBC, SWBT, and the interLATA affiliate. The information may include an organizational chart, and shall include the corporate reporting relationships between and among SBC, SWBT and the interLATA affiliate.

MT-165 Please identify any individuals who are officers, directors or employees of both SWBT and its interLATA affiliate.

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- MT-166 Please describe the procedure and manner in which SWBT documents and publicly discloses the asset or service transferred between SWBT and its interLATA affiliate and the rates, terms and conditions of such transactions, including how SWBT identifies such affiliate transactions and insures that they are documented and disclosed.
- MT-167 Please state the time period of affiliate transactions covered by the documentation and disclosure, i.e., the dates of the transactions entered into or still in effect between SWBT and its interLATA affiliate.
- MT-168 Please identify all divisions and business units of SWBT that sell network elements, meet-point facilities or wholesale services to interexchange carriers or process orders for network elements and wholesale services by interexchange carriers.
- MT-169 Please identify any affiliated entities, successors, or assigns of SWBT to which SWBT has transferred ownership of any network elements or meet-point facilities that must be provided on an unbundled basis pursuant to section 251(c)(3) or any other local exchange and exchange access facilities and capabilities.
- MT-170 Please identify which corporate subsidiary of SBC will provide in-region intraLATA long distance once SWBT is authorized to provide in-region interLATA long distance through an affiliate. If this entity is neither SWBT nor SBC's interLATA telecommunications service affiliate, then answer questions 1, 2, 3, and 4 above, for the intraLATA affiliate.

### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 24<sup>th</sup> day of November, 1998.

Paul S. DeFord (cd)  
Paul S. DeFord

Paul Gardner  
Goller, Gardner & Feather  
131 E. High  
Jefferson City, MO 65101

W. R. England, III  
Brydon, Swearengen & England  
312 E. Capitol, PO Box 456  
Jefferson City, MO 651020456

Stephen Morris  
MCI  
701 Brazos, Ste. 600  
Austin, TX 78701

Mark Harper  
UTC  
5454 W. 110th St.  
Overland Park, KS 66211

Craig Johnson  
Anderreck, Evans, Milne, Peace  
& Baumhoer  
PO Box 1438  
Jefferson City, MO 65102

Douglas W. Trabaris  
Elizabeth Howland  
Teleport Comm. Group  
233 S. Wacker Dr., Ste. 2100  
Chicago, IL 60606

Mary Ann Young  
PO Box 104595  
Jefferson City, MO 65102

Office of Public Counsel  
PO Box 7800  
Jefferspn City, MO 65102

Linda Gardner  
UTC  
5454 W. 110th St.  
Overland Park, KS 66211

Mary Comley  
Newman, Comley & Ruth  
205 E. Capitol Ave.  
PO Box 537  
Jefferson City, MO 65102

Paul Lane, Diana Harter, Leo  
Bub  
SWB  
100 N. Tucker Blvd., Rm. 630  
St. Louis, MO 63101-1976

Carl Lumley  
Leland B. Curtis  
130 S. Bemiston, Ste. 200  
ST. Louis, MO 63105

Ken Schiffman  
Sprint  
8140 Ward Parkway  
Kansas City, MO 64114

Rick Zucker  
GTE  
GTE Service Corp.  
225 Madison, 2nd Floor  
Jefferson City, MO 65101