

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

Delta Phones, Inc.,)	
)	
Complainant,)	
)	
v.)	Case No. TC-2004-0064
)	
Southwestern Bell Telephone Company, L.P.,)	
d/b/a Southwestern Bell Telephone Company,)	
)	
Respondent.)	

AFFIDAVIT OF GERT ANDERSEN

STATE OF WISCONSIN)	
)	SS
CITY OF MILWAUKEE)	

COMES NOW Gert Andersen being duly sworn on his oath, and states as follows:

1. My name is Gert Andersen. My business address is 722 North Broadway, Milwaukee, Wisconsin 53202. I am the Director-Accounting Operations for SBC Services, Inc. My responsibilities include collections from competitive local exchange companies ("CLECs") for local and collocation services provided by various incumbent local exchange carriers owned by SBC Communications, Inc., including Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri").
2. In my position as Director-Accounting Operations, I am familiar with and responsible for collection activities involving amounts owed by Delta Phones, Inc. to Southwestern Bell Telephone, L.P., including amounts owed for services provided in the State of Missouri. As of August 19, 2003, Delta Phones has an unpaid balance of \$1,438,076.06 to SBC Missouri for services provided by SBC Missouri to Delta Phones in Missouri. Of that total amount, \$1,320,744.95 is past due. Delta Phones has not made any payment for services provided by SBC Missouri to Delta Phones since March 21, 2003. Since that time, Delta Phones has incurred hundreds of thousands of dollars in unpaid charges for services provided by SBC Missouri.

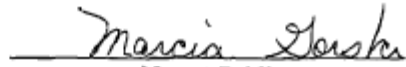
3. Delta Phones was last current in its required payments to SBC Missouri in November, 2002. Since then, SBC Missouri has continued to provide service to Delta Phones, and Delta Phones has incurred the following monthly charges:

November, 2002	\$ 81,937.56
December, 2002	\$ 75,594.84
January, 2003	\$ 70,884.14
February, 2003	\$ 90,648.35
March, 2003	\$172,111.29
April, 2003	\$284,847.06
May, 2003	\$303,401.00
June, 2003	\$232,268.59
July, 2003	\$170,157.58
August, 2003	\$153,063.37

- 4 From December 1, 2002, through August 20, 2003, Delta Phones has made just one payment to SBC Missouri, in March, 2003, in the amount of \$154,517.20. As a result, through August, 2003, Delta Phones has incurred hundreds of thousands of dollars of undisputed charges since March, 2003, without any payment to SBC Missouri whatsoever.
5. Although required to do so by the terms of its interconnection agreement, Delta Phones has not paid undisputed charges nor has it paid disputed charges into escrow for services provided by SBC Missouri.


Gert Andersen

Subscribed and sworn to before me this 25th day of August, 2003


Notary Public

State of Wisconsin }
Milwaukee County } ss

Subscribed and sworn to before me
this 25 day of August, 20 03

Notary Public, Milwaukee County, Wis.

Commission expires July 22, 2007