1.5. As of the date of the filing of Staff's testimony in this case, please describe the nature and extent of competition faced by SWBT, Sprint, Verizon and Spectra using the same indicators as in the prior question.

Answer: The nature and extent of competition faced by SWBT, Sprint, Century Tel and Spectra at this time is unknown, as no such specific analysis has been conducted, although a general analysis of facility based competition is described in this case in Voight's direct testimony beginning on page 20. Generally, SWBT is faced with facility based competition as described in the publicly available documents in Case No. TO-2001-467. In the former GTE areas, Spectra and/or Century Tel has facility based competition from Mark Twain, Fidelity, and Charter. Sprint has facility based competition from the former ExOP and from Green Hills. A review of the publicly available tariffs of the C-LECs would reveal for BPS exactly where the C-LECs are holding themselves out to be providers of basic local exchange service.

The amount of resale, UNE, and UNE platform competition for these price cap carriers has not been investigated or researched. However, in an effort to categorize competition in more detail, C-LECs, as of 2002, are now required to report the information requested by BPS. However, a compilation of that data has not been undertaken, in large part due to incomplete and inaccurate reporting by C-LECs.

Exhibit No. 13

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