

EXHIBIT

Exhibit No.:

Issue(s) Status of Competition for Basic Local
and Associated Services
Witness/Type of Exhibit: Meisenheimer/Rebuttal
Sponsoring Party: Public Counsel
Case No.: IO-2003-0281

REBUTTAL TESTIMONY

OF

BARBARA A. MEISENHEIMER

FILED

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Missouri Public
Service Commission

Submitted on Behalf of the Office of the Public Counsel

SPRINT MISSOURI, INC.

Case No. IO-2003-0281

JUNE 10, 2003

NP

Exhibit No. 8 NP
Case No(s) IO-2003-0281
Date 7-14-03 Rptr DC

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

In the Matter of the Invesitgation of the)
State of Competition in the Exchanges of) Case No. IO-2003-0281
Sprint Missouri, Inc.)

AFFIDAVIT OF BARBARA A. MEISENHEIMER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Barbara A. Meisenheimer, of lawful age and being first duly sworn, deposes and states:

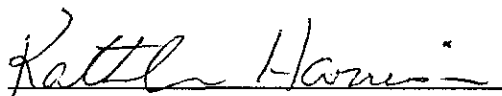
1. My name is Barbara A. Meisenheimer. I am Chief Utility Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony consisting of pages 1 through 25 and Attachment 1 through 4.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.



Barbara A. Meisenheimer

Subscribed and sworn to me this 10th day of June, 2003.

KATHLEEN HARRISON
Notary Public - State of Missouri
County of Cole
My Commission Expires Jan. 31, 2006



Kathleen Harrison
Notary Public

My Commission expires January 31, 2006.

REBUTTAL TESTIMONY
OF
BARBARA A. MEISENHEIMER

SPRINT MISSOURI, INC.

CASE NO. IO-2003-0281

INTRODUCTION

1
2 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

3 A. Barbara A. Meisenheimer, Public Utility Economist, Office of the Public Counsel, P. O. Box 7800,
4 Jefferson City, Missouri 65102. I am also employed as an adjunct Economics Instructor for
5 William Woods University.

6 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND EMPLOYMENT BACKGROUND.**

7 A. I hold a Bachelor of Science degree in Mathematics from the University of Missouri-Columbia
8 (UMC) and have completed the comprehensive exams for a Ph.D. in Economics from the same
9 institution. My two fields of study are Quantitative Economics and Industrial Organization. My
10 outside field of study is Statistics. I have taught Economics courses for the following institutions:
11 University of Missouri-Columbia, William Woods University, and Lincoln University. I have
12 taught courses at both the undergraduate and graduate levels.

13 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THIS COMMISSION?**

14 A. Yes.

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

16 A. To present Public Counsel's comments and positions regarding the current state of competition in
17 Sprint Missouri, Inc (Sprint) exchanges and to respond to Sprint's petition to have the Public

1 Service Commission approve a competitive classification for Sprint services pursuant to Section
2 392.245.5, RSMo 2000.

3 Public Counsel wants to primarily address the issue of effective competition for residential and
4 small business customers. While large business customers or customers with high usage are prime
5 targets for competition, competitors have not actively sought the small business customer or
6 residential customer to the same extent. The goal of the Federal Telecom Act of 1996 and SB507 is
7 for competition to benefit the broad range of consumers and not just the upper end business
8 customers.

9 **Q. IN PREPARATION OF YOUR TESTIMONY, WHAT MATERIALS DID YOU**
10 **REVIEW?**

11 A. I have reviewed the direct testimony of Sprint witnesses John Idoux and Mark Harper. I have also
12 reviewed information from the Commission, including, but not limited to, portions of the tariffs and
13 annual reports filed with the Commission by local exchange companies, information regarding
14 certifications of service authority, interconnection agreements and tariff filings maintained by the
15 Staff as well as responses to data requests issued by Public Counsel, the Staff of the Missouri
16 Public Service Commission and parties to the case.

17 **Q. WHAT IS THE PURPOSE OF THIS PROCEEDING?**

18 A. The Commission established this proceeding for the purpose of investigating the state of
19 competition in Sprint exchanges for Sprint telecommunications service in accordance with the
20 "Price Cap Statute," Section 392.245, RSMo 2000.

21 **Q. WHAT PORTION OF SECTION 392.245 IS AT ISSUE IN THIS CASE?**

1 A. The full text of the Subsection 5 of Section 392.245 is the focus of this case. Section 392.245.5
2 states:

3 **"Each telecommunications service of an incumbent local exchange**
4 **telecommunications company shall be classified as competitive in any**
5 **exchange in which at least one alternative local exchange telecommunications**
6 **company has been certified under section 392.455 and has provided basic**
7 **local telecommunications service in that exchange for at least five years,**
8 **unless the commission determines, after notice and a hearing, that effective**
9 **competition does not exist in the exchange for such service.** The commission
10 shall, from time to time, on its own motion or motion by an incumbent local
11 exchange telecommunications company, investigate the state of competition in
12 each exchange where an alternative local exchange telecommunication company
13 has been certified to provide local exchange telecommunications service and **shall**
14 **determine, no later than five years following the first certification of an**
15 **alternative local exchange telecommunication company in such exchange,**
16 **whether effective competition exists in the exchange for the various services of**
17 **the incumbent local exchange telecommunications company.** If the commission
18 determines that effective competition exists in the exchange, the local exchange
19 telecommunications company may thereafter adjust its rates for such competitive
20 services upward or downward as it determines appropriate in its competitive
21 environment. If the commission determines that effective competition does not
22 exist in the exchange, the provisions of paragraph (c) of subdivision (2) of
23 subsection 4 of section 392.200 and the maximum allowable prices established by
24 the provisions of subsections 4 and 11 of this section shall continue to apply. The
25 commission shall from time to time, but no less than every five years, review the
26 state of competition in those exchanges where it has previously found the existence
27 of effective competition, and if the commission determines, after hearing, that
28 effective competition no longer exists for the incumbent local exchange
29 telecommunications company in such exchange, it shall re-impose upon the
30 incumbent local exchange telecommunications company, in such exchange, the
31 provisions of paragraph (c) of subdivision (2) of subsection 4 of section 392.200
32 and the maximum allowable prices established by the provisions of subsections 4
33 and 11 of this section, and, in any such case, the maximum allowable prices
34 established for the telecommunications services of such incumbent local exchange
35 telecommunications company shall reflect all index adjustments which were or
36 could have been filed from all preceding years since the company's maximum
37 allowable prices were first adjusted pursuant to subsection 4 or 11 of this section. "
38 (emphasis supplied.)

39 Q. PLEASE EXPLAIN WHY YOU EMPHASIZED PORTIONS OF THE STATUTE IN
40 YOUR TESTIMONY IN BOLD TEXT.

1 A. I wanted to clearly show to the Commission the full text of the relevant statute because I believe the
2 scope of this case should include a determination of the status of effective competition beyond just
3 the reclassifications that Sprint seeks for specific services in specific exchanges.

4 **Q. PLEASE EXPLAIN WHY THE COMMISSION SHOULD ADDRESS THE STATUS**
5 **OF EFFECTIVE COMPETITION FOR SERVICES AND IN EXCHANGES FOR**
6 **WHICH SPRINT DOES NOT SEEK RECLASSIFICATION.**

7 A. It appears that the timing is right under the price cap statute for the Commission to consider any
8 evidence of effective competition in Sprint exchanges. If no such evidence is presented, the
9 Commission should declare that effective competition does not exist for any other Sprint services in
10 any other Sprint exchanges based upon the lack of evidence of effective competition to support
11 reclassification.

12 On page 3 of his direct testimony, Mr. Idoux describes Sprint's view of the purpose of this
13 case: "The Missouri Public Service Commission ("Commission") opened this investigation to
14 examine the state of competition within the Sprint Missouri exchanges." He cites the portion of
15 Subsection 392.245.5 RSMo 2000 which states that the Commission "shall, from time to time, on
16 its own motion or motion by an incumbent local exchange telecommunications company,
17 investigate the state of competition in each exchange where an alternative local exchange provider
18 ["ALEC" or "CLEC"] has been certified to provide local exchange telecommunications service and
19 shall determine, no later than five years following the first certification of an alternative local
20 exchange telecommunication company in such exchange, whether effective competition exists in
21 the exchange for the various services of the incumbent local exchange telecommunications
22 company."

1 While I agree that the later portion of the price cap statute that Mr. Idoux quotes is relevant,
2 Sprint is seeking competitive classification for only a subset of its services and for some services it
3 is seeking competitive classification for the service in only a subset of its exchanges. Sprint has
4 limited its request for reclassification to only some of its services and only in some of its exchanges.
5 Obviously, Sprint sincerely believes that it can support a showing of effective competition and
6 grounds for reclassifications in this limited, but specific manner, rather than taking a broader sweep
7 for reclassification of all services in all exchanges similar to that attempted by SBC.

8 However, in addition to considering the specific services in the exchanges Sprint has
9 identified, the Commission should consider taking this opportunity to determine that effective
10 competition does not exist for those services and in those exchanges that Sprint does not seek
11 competitive classification at this time.

12 **Q. WHY MIGHT THE COMMISSION WANT TO MAKE A FINDING THAT**
13 **EFFECTIVE COMPETITION DOES NOT EXIST FOR THOSE SERVICES AND**
14 **IN THOSE EXCHANGES THAT SPRINT DOES NOT SEEK COMPETITIVE**
15 **CLASSIFICATION?**

16 **A.** Although I am not an attorney, it appears that the statute requires a finding, after notice and hearing,
17 that effective competition does not exist in the exchange for a service not to be classified as
18 competitive in an exchange in which at least one alternative basic local exchange
19 telecommunications company has been certified under section 392.455 and has provided basic local
20 telecommunications service in that exchange for at least five years as stated at the beginning of
21 392.245.5 RSMo 2000. That portion of the statute reads:

1 "Each telecommunications service of an incumbent local exchange
2 telecommunications company shall be classified as competitive in any exchange in
3 which at least one alternative local exchange telecommunications company has
4 been certified under section 392.455 and has provided basic local
5 telecommunications service in that exchange for at least five years, unless the
6 commission determines, after notice and a hearing, that effective competition does
7 not exist in the exchange for such service."

8 The Commissions Order establishing this case did not specifically limit the investigation to
9 these subsets of services and exchanges for which Sprint requests reclassification.¹ In the
10 Commission's investigation into the state of competition in Southwestern Bell's exchanges, the
11 Commission concluded that its investigation was to cover all exchanges and that it is required to
12 conduct a review of the existence of effective competition for each exchange within that initial 5
13 years. Based upon that case, I recommend that the Commission make a definitive finding for
14 Sprint's other services in all the Company's local exchanges. In the Commission's Report and
15 Order in Case No. TO-2001-467, the Commission found that no alternative basic local exchange
16 carrier had actually been providing service in SWBT's exchanges for 5 years and, therefore, SWBT
17 had the burden of proof to affirmatively demonstrate that effective competition exists under the
18 applicable portion of the statute. As a result, it found that effective competitive did not exist in
19 basic residential and business line services and other related services. Since the application of the
20 price cap statute is similar in this case, I recommend that, even though Sprint has not specifically
21 requested competitive classification for all services and all exchanges, the Commission find that
22 Sprint has not affirmatively demonstrated the existence of effective competition upon conclusion of
23 the review in this case.

¹ Order Case No. IO-2003-0281, Issued February 14, 2003, Effective February 24, 2003.

1 Q. DO YOU BELIEVE THAT THE COMMISSION MUST DECIDE THIS CASE BY
2 DECEMBER 15, 2003?

3 A. No, I do not. Based on my investigation, I agree with Mr. Idoux's statement that ExOp of Missouri
4 d/b/a Unite was the first CLEC to be granted a certificate to provide basic local telecommunication
5 service in a Sprint Missouri exchange. However, the statutory standard requires an exchange-by-
6 exchange, not company-wide analysis and further requires that the ALEC must have been actually
7 providing service in the exchange for 5 years. In Case No. TO-2001-467, the Commission said that
8 although an ALEC was certified for 5 years, no ALEC had actually been providing service in any
9 SWBT exchanges for 5 years. Whether "providing" means simply offering service or the actual
10 initiation and delivery of service to a customer need not be determined in this case. In response to
11 Public Counsel Data Request No. 7, ** _____

12 _____ ** Based on similar responses, ** _____

13 _____ * This would place the ** _____

14 _____ *

15 Q. FROM AN ECONOMIC AND PUBLIC POLICY PERSPECTIVE, HOW SHOULD
16 THE COMMISSION INTERPRET SECTION 392.245.5?

17 A. In my opinion, the statute sets forth reasonable requirements and consumer protections that allows
18 an incumbent local exchange carrier greater flexibility in an effectively competitive environment
19 that also minimize the use of unnecessary resources. While the statute serves to accommodate
20 effective competition for services, it also clearly envisions that effective competition may not
21 develop within all exchanges or for all services. It also recognizes that there is no certainty of
22 effective competition on an ongoing basis. It protects the development of competition and protects
23 consumers by requiring that within the first five of existence of a certified alternative basic local

1 exchange company (ABLEC) in the exchange a service may not be automatically granted
2 competitive status. Instead, the Commission must first conduct a proceeding to investigate and
3 make a determination of whether or not effective competition exists for the service. If the
4 Commission determines that effective competition exists, then the incumbent company gains
5 competitive status for the relevant service. However, periodic reviews are then conducted to ensure
6 that competition is still effective thereby warranting continued fully flexible pricing status for the
7 incumbent. After the first five years during which an ABLEC has provided service in an exchange,
8 the incumbent can petition for competitive service status. Under that circumstance, the petition may
9 be granted without a mandatory review if unchallenged. This aspect of the statute works to
10 eliminate unnecessary reviews thus conserving regulatory and carrier resources.

11 **Q. IF THE COMMISSION FINDS THAT EFFECTIVE COMPETITION DOES NOT**
12 **EXIST FOR THE SERVICES IN AN EXCHANGE AT THIS TIME, HOW CAN**
13 **SPRINT ATTEMPT TO GAIN COMPETITIVE STATUS FOR SERVICES IN THE**
14 **FUTURE?**

15 A. Sprint will have two alternatives. If an ALEC has not been providing basic local service in the
16 exchange for at least five years, Sprint can petition the Commission for competitive classification of
17 the service in the exchange. The Commission must then conduct an investigation regarding the
18 competitive status. A second process is available if an ALEC has been providing basic local service
19 in the exchange for at least five years. Sprint can petition for competitive service status in the
20 exchange and then the reclassification can be granted if the petition goes unchallenged or if
21 opposing parties fail to demonstrate that effective competition still does not exist.

1 **Q. THIS PROCESS FOR SPRINT TO ACHIEVE COMPETITIVE STATUS FOR ITS**
2 **SERVICES APPEARS TO BE ONGOING AND CAN RESULT IN A NUMBER OF**
3 **CONTESTED PROCEEDINGS. IS THIS NECESSARY?**

4 A. Yes, it is both under the price cap statute and under the public policy aspects of the price cap
5 statute. If Sprint is granted competitive status absent effective competition for services in its
6 exchanges, Sprint will be free to raise prices above the levels currently allowed by the price cap
7 formula and customers would not have adequate protection against unreasonable price increases.
8 Under resale, the ALEC's wholesale cost are tied to Sprint's and would rise along with increases in
9 Sprint retail prices. If basic local rates increase, customers will be forced to pay the higher prices or
10 lose access to a service that is essential in ensuring safety, health, and meaningful participation in
11 society. Increases in basic local rates could also negatively impact the welfare of small businesses.
12 If residential basic local rates increase, lifeline rates also rise, which is contrary to the specific intent
13 of providing a more affordable discounted rate to low-income customers. If Sprint increases access
14 rates, IXCs will be forced to absorb the loss or attempt to pass through the increases to all of their
15 customers. Given the links that exist between Sprint's rates and CLEC wholesale rates and
16 charges, it is paramount to protect ratepayers to ensure that effective competition actually exists
17 prior to granting competitive service status.

18 **Q. IF THE ULTIMATE OUTCOME OF THIS PROCEEDING IS A DETERMINATION**
19 **THAT ANY OF SPRINT'S SERVICES ARE SUBJECT TO EFFECTIVE**
20 **COMPETITION IN AN EXCHANGE, SHOULD ANY ADDITIONAL PRICING**
21 **RESTRICTIONS BE IMPOSED ON SPRINT PRIOR TO ALLOWING IT**
22 **FLEXIBILITY FOR THE SERVICE IN THE RELEVANT EXCHANGE?**

23 A. None beyond those restrictions imposed on its competitors.

1 **Q. WHAT TYPES OF EVIDENCE WOULD YOU FIND PERSUASIVE IN**
2 **DEMONSTRATING THAT AN ALEC IS "PROVIDING" SERVICE IN AN**
3 **EXCHANGE.**

4 A. Based on my investigation, the official Commission approval of a tariff does not in itself
5 demonstrate that an ALEC is providing basic local service. Services are not always provided
6 throughout the area for which the tariff applies and tariffs are not always withdrawn when a carrier
7 cancels its service offerings in an area or goes out of business entirely. Additionally, the existence
8 of alternative facilities in the exchange, such as switching equipment or fiber networks, alone does
9 not ensure that the facilities are actually being used to provide an alternative basic local service. I
10 believe that acknowledgement by the competing carrier that it serves customers in an exchange is
11 the surest method for demonstrating that the "providing" requirement is met. Other evidence of
12 "providing service" would be verifiable information that the incumbent provides more than an
13 insignificant number of resold lines or unbundled network elements in the relevant exchange.

14 **Q. WHY IS THERE DIFFERENT TREATMENT FOR SPRINT THAN ITS**
15 **COMPETITORS?**

16 A. A potential need for different treatment of competitors and incumbents on an ongoing basis was
17 codified in the price cap statute as a necessary requirement until effective competition can be relied
18 upon to ensure that consumers would not be harmed by the elimination of regulatory protections for
19 the sustained availability and affordability of basic local telecommunications services. The high
20 standard for the ongoing existence "effective competition" established by statute is completely
21 reasonable given the history and characteristics of the local telecommunications industry in
22 Missouri.

1 Sprint has for decades built and controlled vast local exchange and interexchange networks
2 in Missouri. Network facilities include switches and other central office equipment, trunking lines
3 that link local switching offices and the "loop" which is comprised of the outside plant facilities,
4 including outside terminals, conduit, copper and fiber cables all of which complete the end to end
5 connection from the central offices to customer's homes and businesses. Over time, technological
6 improvements in existing systems and the development of alternative technologies have reduced the
7 economies of scale and scope inherent in the provisioning of some services once characterized as
8 natural monopolies. Such advances tend to diminish the past economic justification for operation
9 of regulated monopolies since a competitive paradigm becomes both more feasible in terms of cost
10 and more attractive in terms of customer choice.

11 Unfortunately, there are still significant barriers to achieving effectively competitive
12 markets. For example, in many areas "bottle neck" facilities controlled by incumbents are still the
13 norm and portions of the network are still subject to scale and scope economies that are exacerbated
14 in geographic areas with low population densities. In addition, incumbent providers have
15 developed name recognition and customer loyalty which reduces the effective operation of a
16 competitive market.

17 For decades, Sprint has enjoyed an exclusive service territory in the State of Missouri,
18 developing longstanding relationships with customers and, albeit under regulatory oversight,
19 generally becoming known for ubiquitous basic local service offerings, affordable prices, reliable
20 services, and timely installations and repairs. Reasonably, these attributes constitute a significant
21 competitive advantage over lesser-known competitors. I believe dissatisfaction with slamming,
22 cramming, and a continuous stream of sales calls during the dinner hour have also made less

sophisticated telecommunications users wary (and weary) of changing providers. This also obviously works to the advantage of an incumbent monopoly when its market is opened to alternative providers. It is also imperative to consider issues of market dominance and the potential for Sprint, either alone or in concert with other carriers, to successfully exert market power once Sprint is released from price caps.

It is important to keep in mind that simply because an incumbent faces a single or a few competitors who are effective in winning customers away does not mean that the market is effectively competitive. The primary economic benefit of truly effective competition is that no single firm or group of firms has the ability to profitably sustain price increases to any significant degree above cost. I believe this is a relevant factor for the Commission to consider in its deliberations.

Q. WHAT ARE THE STATUTORY CRITERIA FOR EVALUATING "EFFECTIVE COMPETITION?"

A. Section 386.020.13, RSMo 2000 provides the following direction:

(13) "Effective competition" shall be determined by the commission based on:

(a) The extent to which services are available from alternative providers in the relevant market;

(b) The extent to which the services of alternative providers are functionally equivalent or substitutable at comparable rates, terms and conditions;

(c) The extent to which the purposes and policies of chapter 392, RSMo, including the reasonableness of rates, as set out in section 392.185, RSMo, are being advanced; and

(d) Existing economic or regulatory barriers to entry; and

(e) Any other factors deemed relevant by the commission and necessary to implement the purposes and policies of chapter 392, RSMo.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS ON THE STATUS OF COMPETITION IN SPRINT EXCHANGES IN TERMS OF THE CRITERIA FOR "EFFECTIVE COMPETITION" LISTED IN SECTION 386.020(13), RSMO.

A. With respect to basic local service, Sprint faces a single competitor in Kearney and another single competitor in Norborne that have been effective in winning customers by deploying alternative facilities. However, I would not consider either market to be effectively competitive because with only two firms controlling the lion's share of the market, it is still highly concentrated and does not provide sufficient assurance against the exercise of market power. In the other exchanges for which Sprint seeks competitive classification of basic local and associated services, the Company still controls the local loop and customers are still captive to the Company or a CLEC that purchases resold services or unbundled network elements from Sprint.

Vertical services, service packages, local operator, local directory, directory listings and flat-rate or discounted local services established by the Commission to satisfy local calling needs are all services which are closely associated with the basic local service. As the Commission said in Case No. TO-2001-467,

"The Commission finds that vertical services and custom calling features are inseparable from the underlying basic local service because vertical services and custom calling features are not available to the customer without that customer being provided the basic local service."

In the interexchange toll market, there are a significant number of competitors and unless the evidence at hearing indicates otherwise, Public Counsel agrees that allowing a competitive classification is appropriate for toll services other than those provided on a flat-rate unlimited usage

1 basis. It is my understanding that Sprint is not seeking competitive classification for access service
2 at this time. I would recommend that the Commission find that access is not effectively competitive
3 for any Sprint exchange.

4 While alternative providers compete with Sprint on a facilities basis, there is a general
5 absence of equivalent or substitutable service available to residential customers and small business
6 customers at comparable rates, terms and conditions. The prepaid service providers constitute the
7 only residential competition. However, prepaid service is designed and marketed to customers
8 with credit problems. Customers pay an exorbitant amount prepaid for local access and do not
9 receive the full range of services as available under Sprint's local service. Mandatory toll blocking
10 and restricted access to +0 and +1 calls do not make the prepaid service a functionally equivalent
11 service.

12 Cellular service is not a functionally equivalent or substitute service as set forth in Section
13 386.020.13, RSMo 2000 since it does not meet the same criteria for 911 service or access to a
14 presubscribed interexchange carrier that wireline service provides. In addition, cellular carriers
15 generally do not recognize the Commission's regulatory authority in the coverage, price, terms or
16 conditions or even reporting of wireless service offerings. Based on my experience, I believe that
17 generally consumers do not use cellular phones as a substitute for landline basic local service to
18 their home. Instead, consumers primarily rely on cellular as a mobile connection to the network and
19 as a means to avoid toll charges for placing calls outside the landline local calling scope. Neither
20 purpose is an attribute of basic local service. For these reasons, I believe it would be inappropriate
21 and contrary to the Commission's charge to give the existence of cellular service much weight in its
22 determination of effective competition for basic local service.

1 Email cannot reasonably be classified as the functional equivalent of voice communication.
2 Voice telephoning over the internet suffers from poor signal quality and is not a functional
3 equivalent.

4 Section 392.185, RSMo. sets out the purposes of Chapter 392, RSMo. The level of
5 competition in the Sprint exchanges has not fulfilled or advanced meaningfully these goals.
6 Sprint's price cap regulatory scheme has as its purpose flexibility for downward pricing to meet
7 competition. This has not occurred to any significant degree. In fact, rates for many services
8 including basic local service have increased under the pricing options available to Sprint under the
9 price cap statute.

10 After consideration of the data presented here about CLECs and their operations in Sprint
11 exchanges, and the other considerations relevant to effective competition, I believe that the
12 Commission should decline to declare Sprint basic local and associated services competitive.

13 **Q. HAVE YOU PERFORMED ANY ANALYSIS THAT CAN ASSIST THE**
14 **COMMISSION DETERMINE WHETHER EFFECTIVE COMPETITION EXISTS IN**
15 **SPRINT'S EXCHANGES?**

16 A. Yes. I considered information from a number of sources, including information regarding access
17 line counts provided by Sprint and CLECs in response to data requests, Annual Reports, and
18 Central Office Code Assignment data available from the NANPA webpage.

19 **Q. PLEASE DESCRIBE YOUR ANALYSIS.**

20 A. Although a few competitive basic local service providers have met with some success in acquiring
21 market share in some exchanges, the local service market remains highly concentrated and Sprint

1 continues to monopolize the market on a statewide basis. In total, an estimate of Sprint's share of
2 statewide access lines is ** _____ ** dwarfing the
3 combined total of its CLEC competitors. For this analysis, competitor totals include prepaid,
4 regular resale, UNE, UNE-P, and CLEC switched service as estimated based on 2002 annual line
5 count information reported by Sprint, Fidelity and Green Hills and information from Sprint's
6 testimony regarding ExOp. On an exchange basis Sprint's market share of total access lines is as
7 follows:

8 ** _____
9 _____
10 _____
11 _____
12 _____
13 _____ **
14

1 ** _____
2 _____
3 _____
4 _____
5 _____
6 _____**

7 In ** _____ ** exceeds the roughly 80% measure of market share that
8 the FCC found to indicate that AT&T monopolized the interstate, domestic, interexchange market
9 in 1993. In the ** _____ **

10 One measure of market dominance (and in turn, the absence of effective competition) is the
11 Herfindahl-Hirschman Index. (HHI) Although it is in an of itself not conclusive, it is a useful tool
12 and is a factor considered by the Department Of Justice in evaluating how "concentrated" a market
13 is in evaluating mergers. It has also been used by FERC and other agencies. It is calculated as the
14 sum of the market shares squared for firms in what is determined to be the relevant geographic and
15 product market. (See Attachment 1)

16 In this case, I believe it is relevant to consider both the statewide market and a geographic
17 market defined at the exchange level. The statewide market can provide some insight as to the
18 degree to which CLECs have been effective in establishing a statewide presence. This will help to
19 demonstrate the likelihood of effective competition to develop across the state and not simply in
20 isolated pockets. Under the price cap statute, the Commission must evaluate the extent to which
21 effective competition exists at the exchange level, it is also worthwhile to, in my opinion, consider
22 the extent to which CLECs have committed to provide services throughout Missouri.

1 Although consumers buy services rather than access lines, access lines or "loops" provide
2 the conduit for carriers to offer consumers a multitude of services, including local services, toll
3 services, operator services, directory services, and a host of custom calling features. That same
4 conduit is required by other carriers to terminate calls. Historically, incumbent local exchange
5 carriers such as Sprint have retained almost exclusive control of this bottleneck facility. This
6 provides the potential for Sprint to exercise some form of market power in the provisioning of
7 virtually every intrastate retail or wholesale service offered over the switched network within its
8 exchanges. The potential exists for Sprint to overcharge both retail consumers and wholesale
9 consumers and to ward off meaningful competition. The 1996 Federal Telecommunications Act
10 attempted to address this concern by requiring the incumbents to open their markets to competition,
11 including the requirement that the incumbent lease parts of its network to competitors. Senate Bill
12 507 attempted to mitigate potential market power by imposing restrictions in the form of price caps
13 that would impose an upper bound on the incumbent while also allowing the incumbent an
14 opportunity to respond to competitive pressures to lower price.

15 Conservative estimates based on landline access lines produce the following HHI values:

16 ** _____
17 _____
18 _____
19 _____
20 _____
21 _____ **

1 ** _____
2 _____
3 _____
4 _____
5 _____
6 _____ *

7 Considering only the residence and business service provided by Sprint and by the
8 facilities-based competitor in each exchange, the HHI estimates based on access lines in every
9 exchange would be ** _____ * which indicates a highly
10 concentrated market. This should cause concern that while a facilities based carrier may exist, there
11 are not enough carriers with sufficiently balanced market share to demonstrate that the market is not
12 concentrated so the potential exercise of market power between a few firms remains a concern.

13 I also investigated numbering code data from NANPA identifying which CLECs have
14 received numbering resources in anticipation of servicing customers using their own switching
15 facilities. I have included Attachment 2 and Attachment 3 that illustrate the entities that currently
16 have active numbering resources in all Sprint's MO exchanges as well as those entities that
17 currently have active numbering resources in the 5 exchanges for which Sprint is seeking
18 competitive status for basic local and associated services. Sprint faces 7 landline carriers statewide
19 that have numbering resources currently assigned;

20 EXOP OF MISSOURI, INC.

21 FIDELITY COMMUNICATION SERVICES I, INC. - MO

22 GREEN HLS ARE CELL TELCO DBA GREEN HLS TELECOM SVC

1 ICG TELECOM GROUP - MO

2 KMC TELECOM III, INC. - MO

3 KMC TELECOM V, INC.-MO

4 LEVEL 3 COMMUNICATIONS, LLC - MO

5 Of these, ICG currently has a pending interconnection and resale agreement with Sprint. Level 3
6 reported serving no access lines in its 2002 Annual Report. KMC Telecom III's CLEC entities
7 reported 0 revenue and KMC Telecom V reported serving no access lines on a retail basis with all
8 revenue generated from the sale of wholesale data ports in its 2002 Annual Report. This means that
9 Sprint faces only three landline basic local service providers that currently provide fully facilities
10 based service. ExOp has the capability and is serving in Kearney. Green Hills has the capability
11 and is serving in Norborne. Fidelity has the capability to serve in 6 exchanges, but is currently only
12 offering service in Rolla and St. Roberts and actually serves customers in only the Rolla exchange.

13 The extremely limited number of fully facilities landline competitors on a statewide and
14 intraexchange providing basic local service strongly suggests that effective competition does not
15 exist in Sprint's local exchanges.

16 In my investigation and analysis I have also reviewed CLEC data request responses, CLEC
17 tariffs and ALEC annual reports. Comparing this data to Sprint witness John Idoux's list of 25
18 carriers that Sprint claims are actually providing some level of service in Sprint's exchanges
19 provides a different picture than the one presented by Sprint. The data raises concerns about the
20 adequacy of those services as well as the accuracy of Sprint's claim.

1 Attachment 4 presents the results of my investigation into the CLECs offering service. I
2 discovered that in some cases the CLECs identified as providing service in Missouri are not actually
3 providing service. Some CLECs listed are piece parts of larger entities due to mergers or
4 acquisitions. Some "providers" on the list have a canceled certificate of service authority. Others
5 CLECs do not appear to have tariffs that apply for Sprint exchanges.

6 Based on the discrepancies between the providers claimed by Sprint and those that actually
7 provide service, and provide in compliance with tariffs, the Commission should reject the notion
8 that competition is as prevalent as claimed in Sprint's testimony.

9 Mr. Idoux states in his testimony that he placed calls to carriers listed in local directories to
10 verify that they served certain communities. Based on my research, it appears that either carriers
11 are providing contrary to tariff, the carrier erred in responding to his inquiry or to my data requests
12 or that there was simply a misunderstanding during his contact with the CLECs regarding the
13 carrier that serves in Sprint's portion of the territory. For example, I contacted Max-Tel and spoke
14 to Marie employee #275, who checked 2 numbers for the Sprint Norborne area and said that
15 although they generally provide in Sprint territory, service is not actually available for those
16 Norborne numbers. I also contacted Metro Teleconnect Companies since the Company's tariff did
17 not appear to cover Sprint's Norborne exchange. Natasha, a service rep, told me that such a
18 discrepancy is sometimes possible because service reps have access to only limited information at
19 sign-up; a service order verification occurs at a later stage than the initial contact with the customer.

20 Regardless of the specific cause of the differences, Sprint relies on these two carriers to seek
21 competitive classification in each of the 5 exchanges. I believe there are significant questions
22 remaining about the number of competitors Sprint faces in these exchanges.

Attachment 6 also highlights that Sprint faces little competition from resellers of traditional basic local service. In fact, Sprint appears in three of the five exchanges to face a lone facilities-based CLEC with almost, if not all, of the other CLECs providing prepaid service. Prepaid providers offer an inferior service at a substantially higher price than Sprint's basic local service. Prepaid carriers serve a niche market of primarily residential customers and do not provide the equivalent of Sprint's basic local service either in terms of service, price, or other terms and conditions. Prepaid companies generally block toll, access to operator and to directory assistance and do not offer Lifeline service for a discounted rate to low-income consumers. Prepaid offerings cannot be relied upon to provide price discipline for Sprint's basic local service once the Company is no longer constrained by price cap regulation. For this reason prepaid offerings should be rejected as demonstrative of effective competition for basic local and associated services. In response to SWBT's attempts to use prepaid offerings as evidence of effective competition in Case No. TO-2001-467, the Commission stated;

The Commission was not persuaded by Southwestern Bell's evidence of prepaid basic local service as effective competition. Prepaid basic local service requires a customer to pay rates that are many times higher than Southwestern Bell's basic local rate. The increased rate is usually attributable to the customers problematic credit history. The evidence showed that Southwestern Bell is not currently providing prepaid service in Missouri.

Q. BASED ON YOUR ANALYSIS OF THE STATE OF COMPETITION IN MISSOURI, WHAT ARE YOUR CONCLUSIONS REGARDING EFFECTIVE COMPETITION FOR BASIC LOCAL SERVICE?

A. The loop continues to be a bottleneck facility primarily controlled by Sprint. The HHI analysis I conducted on an exchange-by-exchange basis shows that the market for basic local services is highly concentrated and not subject to effective competition.

1 **Q. WHAT ARE THE IMPLICATIONS OF YOUR STUDY ON SERVICES OTHER**
2 **THAN BASIC LOCAL SERVICE?**

3 A. The competitive status of vertical services and class features depends on and is intertwined with the
4 status of competition for basic local service. A customer must have basic local service to obtain
5 vertical services; those services are not bought independently, and like basic local, should not be
6 designated as subject to effective competition.

7 The data tells me that effective competition does not exist in any Sprint exchange. For
8 basic local service and the associated services such as custom calling features, operator assistance,
9 local directory assistance. There is not an exchange in the state where Sprint or Sprint in
10 conjunction with only 1 other competitor does not enjoy market dominance by virtue of the control
11 of the loop.

12 The toll market for per minute and block of time plans is more ripe and subject to effective
13 competition as evidenced by the number of IXC providers, and the aggressive marketing of that
14 measured type of toll service.

15 **Q. SPRINT WITNESS IDOUX HAS DIVIDED THE SERVICES HE DISCUSSES**
16 **INTO 3 PRIMARY GROUPS. PLEASE SUMMARIZE PUBLIC COUNSEL'S**
17 **FINDINGS ON THE STATUS OF COMPETITION OR ITS POSITION ON EACH**
18 **OF THESE CATEGORIES.**

19 A. Residential/Business Access Line Switched Services

20 Public Counsel has serious concerns regarding Sprint's characterization of the competitiveness of
21 basic local residential and business offerings. The statewide and individual basic exchange markets

are not subject to effective competition at this time and such services should not receive a competitive designation. Public Counsel opposes a competitive classification for (1) Local Exchange Service, (2) Local Measured Service, (3) EAS, (4) ISDN, PRI and PRI I. Public Counsel does not take a position on (5) Payphone, (6) PBX related services at this time.

Line Related Services

At this time, Public Counsel opposes a competitive classification for vertical or custom calling features, directory listings and any bundled groups of services or service packages that contain even one noncompetitive component. The classification of these services should be linked to the classification of the "access line service."

MCA and Busy Line Verification

At this time, Public Counsel opposes a competitive classification for Busy Line Verification and believes that its classification should be linked to the classification of the "access line service." At this time, Public Counsel opposes a competitive designation for MCA service regardless of the classification of the "access line service."

Q. WHAT IS YOUR POSITION REGARDING THE CLASSIFICATION OF SERVICES THAT MARK HARPER PRESENTS?

A. Interexchange and Toll Service

Public Counsel could support a competitive classification for interexchange services and toll service that do not involve flat-rate unlimited usage, such as MCA and unlimited toll calling plans.

1 Local Operator and Local Directory Service

2 These services are not subject to effective competition. Because Sprint still dominates the local
3 service in each exchange, most calls to directory assistance and to the local operator are directed to
4 Sprint or in agreement with Sprint they may be sent to another carrier.

5 Other Services


6 Public Counsel takes no position at this time concerning the existence of effective competition for
7 those remaining services discussed by Mr. Harper. Therefore, Public Counsel takes no position on
8 reclassification under Section 392.245.

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

10 **A.** Yes, it does.

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Horizontal Merger Guidelines

 US Department of Justice Seal US Federal Trade Commission Seal

U.S. Department of Justice
and the
Federal Trade Commission

Issued: April 2, 1992

Revised: April 8, 1997

Note: Section 4 of these Guidelines, relating to Efficiencies, appears as it was issued in revised form by the Department of Justice and the Federal Trade Commission on April 8, 1997; and the footnotes in Section 5 of the Guidelines have been renumbered accordingly. The remaining portions of the Guidelines were unchanged in 1997, and appear as they were issued on April 2, 1992.

Table of Contents

O. Purpose, Underlying Policy Assumptions, and Overview

0.1 Purpose and Underlying Policy Assumptions of the Guidelines

0.2 Overview

1. Market Definition, Measurement and Concentration

1.0 Overview

1.1 Product Market Definition

Attachment 1

1.22), the Agency will include only sales likely to be made into, or capacity likely to be used to supply, the relevant market in response to a "small but significant and nontransitory" price increase.

1.43 Special Factors Affecting Foreign Firms

Market shares will be assigned to foreign competitors in the same way in which they are assigned to domestic competitors. However, if exchange rates fluctuate significantly, so that comparable dollar calculations on an annual basis may be unrepresentative, the Agency may measure market shares over a period longer than one year.

If shipments from a particular country to the United States are subject to a quota, the market shares assigned to firms in that country will not exceed the amount of shipments by such firms allowed under the quota.⁽¹⁶⁾ In the case of restraints that limit imports to some percentage of the total amount of the product sold in the United States (i.e., percentage quotas), a domestic price increase that reduced domestic consumption also would reduce the volume of imports into the United States. Accordingly, actual import sales and capacity data will be reduced for purposes of calculating market shares. Finally, a single market share may be assigned to a country or group of countries if firms in that country or group of countries act in coordination.

1.5 Concentration and Market Shares

Market concentration is a function of the number of firms in a market and their respective market shares. As an aid to the interpretation of market data, the Agency will use the Herfindahl-Hirschman Index ("HHI") of market concentration. The HHI is calculated by summing the squares of the individual market shares of all the participants.⁽¹⁷⁾ Unlike the four-firm concentration ratio, the HHI reflects both the distribution of the market shares of the top four firms and the composition of the market outside the four firms. It also gives proportionately greater weight to the market shares of the larger firms, in accord with their relative importance in competitive interactions.

The Agency divides the spectrum of market concentration as measured by the HHI into three regions that can be broadly characterized as unconcentrated (HHI below 1000), moderately concentrated (HHI between 1000 and 1800), and highly concentrated (HHI above 1800). Although the resulting regions provide a useful framework for merger analysis, the numerical divisions suggest greater precision than is possible with the available economic tools and information. Other things being equal, cases falling just above and just below a threshold present comparable competitive issues.

1.51 General Standards

In evaluating horizontal mergers, the Agency will consider both the post-merger market concentration and the increase in concentration resulting from the merger.

⁽¹⁸⁾ Market concentration is a useful indicator of the likely potential competitive

effect of a merger. The general standards for horizontal mergers are as follows:

a) Post-Merger HHI Below 1000. The Agency regards markets in this region to be unconcentrated. Mergers resulting in unconcentrated markets are unlikely to have adverse competitive effects and ordinarily require no further analysis.

b) Post-Merger HHI Between 1000 and 1800. The Agency regards markets in this region to be moderately concentrated. Mergers producing an increase in the HHI of less than 100 points in moderately concentrated markets post-merger are unlikely to have adverse competitive consequences and ordinarily require no further analysis. Mergers producing an increase in the HHI of more than 100 points in moderately concentrated markets post-merger potentially raise significant competitive concerns depending on the factors set forth in Sections 25 of the Guidelines.

c) Post-Merger HHI Above 1800. The Agency regards markets in this region to be highly concentrated. Mergers producing an increase in the HHI of less than 50 points, even in highly concentrated markets post-merger, are unlikely to have adverse competitive consequences and ordinarily require no further analysis. Mergers producing an increase in the HHI of more than 50 points in highly concentrated markets post-merger potentially raise significant competitive concerns, depending on the factors set forth in Sections 25 of the Guidelines. Where the post-merger HHI exceeds 1800, it will be presumed that mergers producing an increase in the HHI of more than 100 points are likely to create or enhance market power or facilitate its exercise. The presumption may be overcome by a showing that factors set forth in Sections 25 of the Guidelines make it unlikely that the merger will create or enhance market power or facilitate its exercise, in light of market concentration and market shares.

1.52 Factors Affecting the Significance of Market Shares and Concentration

The post-merger level of market concentration and the change in concentration resulting from a merger affect the degree to which a merger raises competitive concerns. However, in some situations, market share and market concentration data may either understate or overstate the likely future competitive significance of a firm or firms in the market or the impact of a merger. The following are examples of such situations.

1.521 Changing Market Conditions

Market concentration and market share data of necessity are based on historical evidence. However, recent or ongoing changes in the market may indicate that the current market share of a particular firm either understates or overstates the firm's future competitive significance. For example, if a new technology that is important to long-term competitive viability is available to other firms in the market, but is not available to a particular firm, the Agency may conclude that the historical market share of that firm overstates its future competitive significance. The Agency will consider reasonably predictable effects of recent or ongoing changes in market conditions in interpreting market concentration and market share data.

1.522 Degree of Difference Between the Products and Locations in the Market and Substitutes Outside the Market

All else equal, the magnitude of potential competitive harm from a merger is greater if a hypothetical monopolist would raise price within the relevant market by substantially more than a "small but significant and nontransitory" amount. This may occur when the demand substitutes outside the relevant market, as a group, are not close substitutes for the products and locations within the relevant market. There thus may be a wide gap in the chain of demand substitutes at the edge of the product and geographic market. Under such circumstances, more market power is at stake in the relevant market than in a market in which a hypothetical monopolist would raise price by exactly five percent.

2. The Potential Adverse Competitive Effects of Mergers

2.0 Overview

Other things being equal, market concentration affects the likelihood that one firm, or a small group of firms, could successfully exercise market power. The smaller the percentage of total supply that a firm controls, the more severely it must restrict its own output in order to produce a given price increase, and the less likely it is that an output restriction will be profitable. If collective action is necessary for the exercise of market power, as the number of firms necessary to control a given percentage of total supply decreases, the difficulties and costs of reaching and enforcing an understanding with respect to the control of that supply might be reduced. However, market share and concentration data provide only the starting point for analyzing the competitive impact of a merger. Before determining whether to challenge a merger, the Agency also will assess the other market factors that pertain to competitive effects, as well as entry, efficiencies and failure.

This section considers some of the potential adverse competitive effects of mergers and the factors in addition to market concentration relevant to each. Because an individual merger may threaten to harm competition through more than one of these effects, mergers will be analyzed in terms of as many potential adverse competitive effects as are appropriate. Entry, efficiencies, and failure are treated in Sections 35.

2.1 Lessening of Competition Through Coordinated Interaction

A merger may diminish competition by enabling the firms selling in the relevant market more likely, more successfully, or more completely to engage in coordinated interaction that harms consumers. Coordinated interaction is comprised of actions by a group of firms that are profitable for each of them only as a result of the accommodating reactions of the others. This behavior includes tacit or express collusion, and may or may not be lawful in and of itself.

Successful coordinated interaction entails reaching terms of coordination that are

Central Office Code Assignments For Sprint MO Exchanges

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	660-476	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	APPLETONCY	APCYMOXARS0	AS		
MO	660-538	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BLACKBURN	BLBNMOXARS0	AS		
MO	660-498	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BLAIRSTOWN	BLTWMOXARS0	AS		
MO	573-496	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BRAZITO	BRZTMOXARS0	AS		
MO	816-249	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BUCKNER	BCKNMOXARS0	AS		
MO	816-650	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BUCKNER	BCKNMOXARS0	AS		
MO	660-386	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	BUTLER	WRBGMOXAAMD	AS	12/12/2001	I
MO	660-227	6664	SPRINT SPECTRUM L.P.	BUTLER	INDPMOCJCM0	AS	05/31/2002	I
MO	660-200	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BUTLER	BTLRMOXARS0	AS		
MO	660-679	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	BUTLER	BTLRMOXARS0	AS		
MO	660-424	6029	SWB MOBILE SYSTEMS - MO	BUTLER	WRBGMOXCH01	AS		
MO	660-464	5031	WESTERN WIRELESS CORPORATION-MO	BUTLER	BTLRMOAO1MD	AS	06/18/2001	I
MO	660-694	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CALHOUN	CLHNMOXBRS0	AS		
MO	573-796	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CALIFORNIA	CLFRMOXARS0	AS		
MO	816-280	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CAMDEN PT	CMPNMOXARS0	AS		
MO	816-445	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CAMDEN PT	CMPNMOXARS0	AS		
MO	573-584	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CENTERTOWN	CNTWMOXARS0	AS		
MO	660-225	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	CENTERVIEW	WRBGMOXAAMD	AS	08/20/2002	I
MO	660-656	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CENTERVIEW	CNVWMOXARS0	AS		
MO	660-678	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CHILHOWEE	CHLHMOXARS0	AS		
MO	573-787	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CLARKSBURG	CLBGMOXARS0	AS		
MO	660-525	6701	AERIAL COMMUNICATIONS	CLINTON	CLTNMOAJ0MD	AS		
MO	660-383	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	CLINTON	WRBGMOXAAMD	AS	12/12/2001	I
MO	660-924	6664	SPRINT SPECTRUM L.P.	CLINTON	INDPMOCJCM0	AS		
MO	660-885	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CLINTON	CLTNMOXADS0	AS		
MO	660-890	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CLINTON	CLTNMOXADS0	AS		
MO	660-351	6029	SWB MOBILE SYSTEMS - MO	CLINTON	WRBGMOXCH01	AS		
MO	660-492	5031	WESTERN WIRELESS CORPORATION-MO	CLINTON	BTLRMOAO1MD	AS		
MO	660-217	3375	KMC TELECOM III, INC. - MO	COAL	WRBGMOXAXMD	AS	05/17/2001	I
MO	660-477	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	COAL	COALMOXARS0	AS		
MO	660-668	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	COLE CAMP	CLCMMOXXRS0	AS		
MO	660-683	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	CRAIG	CRAGMOXARS0	AS		
MO	816-450	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	DEARBORN	DRBRMOXARS0	AS		
MO	816-992	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	DEARBORN	DRBRMOXARS0	AS		
MO	660-696	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	DEEPWATER	DPWRMOXARS0	AS		
MO	816-227	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	EDGERTON	EGTNMOXARS0	AS		
MO	816-790	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	EDGERTON	EGTNMOXARS0	AS		
MO	573-595	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	EUGENE	JFCYMOXAXGX	AS	08/09/2002	I
MO	573-498	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	EUGENE	EUGNMOXARS0	AS		
MO	660-686	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FAIRFAX	FRFXMOXARS0	AS		

Purple -Sprint MO

Pink -Other Sprint

Yellow -CLEC Current Or Near Future Basic Local Competitor

Blue -Other Wireless Not Offering Basic Local

White - CLEC Not Offering Basic Local

Data From NANPA File Update 06/03/2003

Attachment 2

Central Office Code Assignments For Sprint MO Exchanges

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	816-466		6530 MOBILE RADIO COMMUNICATIONS DBA MOBILFONE	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-490		6530 MOBILE RADIO COMMUNICATIONS DBA MOBILFONE	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-243		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-270		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-464		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-713		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	573-452		3275 FIDELITY COMMUNICATION SERVICES I, INC. - MO	FTLENARDWD	ROLLMOAURS0	AS	06/06/2002	I
MO	573-512		6232 NEXTEL COMMUNICATIONS	FTLENARDWD	ROLLMOBO0MD	AS		
MO	573-586		8454 SPRINT SPECTRUM L.P. - MO	FTLENARDWD	ROLLMOAU0MD	AS	01/07/2002	I
MO	573-329		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FTLENARDWD	FTLWMOXARS0	AS		
MO	573-563		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FTLENARDWD	FTLWMOXARS0	AS		
MO	573-596		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FTLENARDWD	FTLWMOXARS0	AS		
MO	660-527		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	GREENRIDGE	GNRGMOXARS0	AS		
MO	660-398		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HARDIN	HRDNMOXARS0	AS		
MO	816-258		6701 AERIAL COMMUNICATIONS	HARRISONVL	HNVLMOXB1MD	AS		
MO	816-925		3375 KMC TELECOM III, INC. - MO	HARRISONVL	WRBGMOXAXMD	AS	05/17/2001	I
MO	816-738		6664 SPRINT SPECTRUM L.P.	HARRISONVL	INDPMOCJCM0	AS		
MO	816-380		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HARRISONVL	HNVLMOXARS0	AS		
MO	816-884		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HARRISONVL	HNVLMOXARS0	AS		
MO	816-887		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HARRISONVL	HNVLMOXARS0	AS		
MO	816-692		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	HENRIETTA	WRBGMOXAAMD	AS	04/22/2002	I
MO	816-290		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HENRIETTA	HNRTMOXARS0	AS		
MO	816-494		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HENRIETTA	HNRTMOXARS0	AS		
MO	816-735		3375 KMC TELECOM III, INC. - MO	HOLDEN	WRBGMOXAXMD	AS	05/17/2001	I
MO	816-732		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HOLDEN	HLDNMOXARS0	AS		
MO	816-850		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HOLDEN	HLDNMOXARS0	AS		
MO	816-264		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HOLT	HOLTMOXARS0	AS		
MO	816-320		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HOLT	HOLTMOXARS0	AS		
MO	660-778		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HOPKINS	HPKNMOXARS0	AS		
MO	660-568		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	HOUSTONIA	HOSTMOXARS0	AS		
MO	660-285		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	IONIA	IONIMOXARS0	AS		
MO	573-644		6010 AT&T WIRELESS SERVICES, INC.	JEFFERSNCF	JFCYMOXAGMD	AS		
MO	573-645		6010 AT&T WIRELESS SERVICES, INC.	JEFFERSNCF	JFCYMOXAGMD	AS		
MO	573-680		6532 CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	JEFFERSNCF	JFCYMOXADS0	AS		
MO	573-664		5814 CELLCO PARTNERSHIP DBA VERIZON WIRELESS - MO	JEFFERSNCF	JFCYMOXACM1	AS	06/17/2002	I
MO	573-415		3375 KMC TELECOM III, INC. - MO	JEFFERSNCF	JFCYMOXAXMD	AS		
MO	573-298		4932 LEVEL 3 COMMUNICATIONS, LLC - MO	JEFFERSNCF	CLMAMOWB8MD	AS	05/31/2002	I
MO	573-257		6232 NEXTEL COMMUNICATIONS	JEFFERSNCF	JFCYMODG1MD	AS		
MO	573-230		8454 SPRINT SPECTRUM L.P. - MO	JEFFERSNCF	JFCYMODUCM0	AS		
MO	573-353		8454 SPRINT SPECTRUM L.P. - MO	JEFFERSNCF	JFCYMODUCM0	AS		

Purple -Sprint MO

Pink -Other Sprint

Yellow -CLEC Current Or Near Future Basic Local Competitor

Blue -Other Wireless Not Offering Basic Local

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Data From NANPA File Update 06/03/2003

Central Office Code Assignments For Sprint MO Exchanges

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	573-522		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXA1XD	AS		
MO	573-526		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXA1XD	AS		
MO	573-556		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-632		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-634		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-635		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-636		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-638		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-659		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-681		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-751		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXA1XD	AS		
MO	573-761		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-893		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	JFCYMOXADS0	AS		
MO	573-896		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	JEFFERSNCY	HLSMMOXARS0	AS		
MO	573-291		6029 SWB MOBILE SYSTEMS - MO	JEFFERSNCY	JFCYMOCGH01	AS		
MO	573-301		6029 SWB MOBILE SYSTEMS - MO	JEFFERSNCY	JFCYMOXANMD	AS	04/21/2003	G
MO	573-619		6029 SWB MOBILE SYSTEMS - MO	JEFFERSNCY	JFCYMOCGH01	AS		
MO	573-690		6029 SWB MOBILE SYSTEMS - MO	JEFFERSNCY	JFCYMOCGH01	AS		
MO	573-694		6029 SWB MOBILE SYSTEMS - MO	JEFFERSNCY	JFCYMOCGH01	AS		
MO	573-821		6029 SWB MOBILE SYSTEMS - MO	JEFFERSNCY	JFCYMOCGH01	AS		
MO	573-462		6529 T-MOBILE USA, INC.	JEFFERSNCY	CLMAMORS0MD	AS		
MO	573-797		6529 T-MOBILE USA, INC.	JEFFERSNCY	CLMAMORS0MD	AS		
MO	573-338		6275 UNITED STATES CELLULAR CORP. - MISSOURI	JEFFERSNCY	JFCYMO01CM0	AS		
MO	573-691		6275 UNITED STATES CELLULAR CORP. - MISSOURI	JEFFERSNCY	JFCYMO01CM0	AS		
MO	816-902		6102 EXOP OF MISSOURI, INC.	KEARNEY	KRNYMO01DS0	AS		
MO	816-903		6102 EXOP OF MISSOURI, INC.	KEARNEY	KRNYMO01DS0	AS		
MO	816-628		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KEARNEY	KRNYMOXADS1	AS		
MO	816-635		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KEARNEY	KRNYMOXADS1	AS		
MO	660-483		6677 DOBSON CELLULAR SYSTEMS, INC.	KING CITY	MAVLMOXBCM0	AS		
MO	660-535		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KING CITY	KGCYMOXARS0	AS		
MO	816-597		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KINGSVILLE	KGVLMOXARS0	AS		
MO	816-720		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KINGSVILLE	KGVLMOXARS0	AS		
MO	417-664		6295 ALLTEL COMMUNICATIONS, INC. - MO	LEBANON	SPFDMOKCCM0	AS	11/02/2001	I
MO	417-657		3375 KMC TELECOM III, INC. - MO	LEBANON	SPFDMOTLX0Y	AS	03/13/2002	I
MO	417-594		6232 NEXTEL COMMUNICATIONS	LEBANON	SPFDMOTLTMD	AS		
MO	417-344		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	LEBANON	SPFDMOTLXSX	AS	08/09/2002	I
MO	417-288		8454 SPRINT SPECTRUM L.P. - MO	LEBANON	SPFDMOBI2MD	AS	01/08/2002	I
MO	417-532		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LEBANON	LBNNMOXADS0	AS		
MO	417-533		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LEBANON	LBNNMOXADS0	AS		
MO	417-588		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LEBANON	LBNNMOXADS0	AS		

Purple -Sprint MO

Pink -Other Sprint

Yellow -CLEC Current Or Near Future Basic Local Competitor

Blue -Other Wireless Not Offering Basic Local

White - CLEC Not Offering Basic Local

Data From NANPA File Update 06/03/2003

Central Office Code Assignments For Sprint MO Exchanges

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	417-718		6029 SWB MOBILE SYSTEMS - MO	LEBANON	SPFDMOMC2MD	AS		
MO	417-322		6275 UNITED STATES CELLULAR CORP. - MISSOURI	LEBANON	LBNNMOBMCMD	AS	05/09/2001	
MO	417-531		6275 UNITED STATES CELLULAR CORP. - MISSOURI	LEBANON	LBNNMOBMCMD	AS	04/26/2001	
MO	660-653		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LEETON	LETNMOXARS0	AS		
MO	660-232		6701 AERIAL COMMUNICATIONS	LEXINGTON	KSCZMOVR1MD	AS	08/13/2001	1
MO	660-251		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	LEXINGTON	WRBGMOXAAMD	AS	08/09/2002	1
MO	660-259		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LEXINGTON	LXTNMOXARS0	AS		
MO	660-547		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LINCOLN	LNCLMOXARS0	AS		
MO	816-578		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LKLOTAWANA	LKLTMOXARS0	AS		
MO	816-774		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LKLOTAWANA	LKLTMOXARS0	AS		
MO	816-566		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LONEJACK	LNJCMOXARS0	AS		
MO	816-697		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	LONEJACK	LNJCMOXARS0	AS		
MO	660-595		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MALTA BEND	MLBNMOXARS0	AS		
MO	660-528		6701 AERIAL COMMUNICATIONS	MARYVILLE	MAVLMOAL1MD	AS		
MO	660-215		6677 DOBSON CELLULAR SYSTEMS, INC.	MARYVILLE	MAVLMOXBCM0	AS		
MO	660-541		6677 DOBSON CELLULAR SYSTEMS, INC.	MARYVILLE	MAVLMOXBCM0	AS		
MO	660-224		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	MARYVILLE	MAVLMOXASMD	AS	04/17/2002	1
MO	660-853		8454 SPRINT SPECTRUM L.P. - MO	MARYVILLE	WRBGMOXA7MD	AS	03/20/2002	1
MO	660-562		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MARYVILLE	MAVLMOXADS1	AS		
MO	660-582		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MARYVILLE	MAVLMOXADS1	AS		
MO	816-336		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MISSOURICY	MSCYMOXARS0	AS		
MO	816-750		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MISSOURICY	MSCYMOXARS0	AS		
MO	660-693		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MONTROSE	MTRSMOXARS0	AS		
MO	660-572		6677 DOBSON CELLULAR SYSTEMS, INC.	MOUND CITY	MAVLMOXBCM0	AS		
MO	660-442		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	MOUND CITY	MDCYMOXARS0	AS		
MO	573-491		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	NEWBLOMFLD	NBFDMOXARS0	AS		
MO	573-456		3275 FIDELITY COMMUNICATION SERVICES I, INC. - MO	NEWBURG	ROLLMOAURS0	AS	06/06/2002	1
MO	573-762		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	NEWBURG	NWBGMOXARS0	AS		
MO	660-593		6155 GREEN HLS ARE CELL TELCO DBA GREEN HLS TELECOM SVC	NORBORNE	NRBRMO01RS0	AS		
MO	660-250		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	NORBORNE	WRBGMOXAAMD	AS	08/09/2002	1
MO	660-594		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	NORBORNE	NRBRMOXARS0	AS		
MO	816-267		6701 AERIAL COMMUNICATIONS	OAK GROVE	OKGVMOXB1MD	AS		
MO	816-625		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	OAK GROVE	OKGVMOXADS1	AS		
MO	816-690		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	OAK GROVE	OKGVMOXADS1	AS		
MO	816-263		6701 AERIAL COMMUNICATIONS	ODESSA	ODSSMOXD1MD	AS		
MO	816-956		5722 KMC TELECOM V, INC. - MO	ODESSA	WRBGMOXAXMD	AS	05/14/2001	1
MO	816-653		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	ODESSA	WRBGMOXAAMD	AS	08/09/2002	1
MO	816-230		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ODESSA	ODSSMOXARS0	AS		
MO	816-633		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ODESSA	ODSSMOXARS0	AS		
MO	816-565		6029 SWB MOBILE SYSTEMS - MO	ODESSA	WRBGMOXCH01	AS		

Purple - Sprint MO

Pink - Other Sprint

Yellow - CLEC Current Or Near Future Basic Local Competitor

Blue - Other Wireless Not Offering Basic Local

White - CLEC Not Offering Basic Local

Data From NANPA File Update 06/03/2003

Central Office Code Assignments For Sprint MO Exchanges

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	816-496		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ORRICK	ORCKMOXARS0	AS		
MO	816-770		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ORRICK	ORCKMOXARS0	AS		
MO	660-366		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	OTTÉVILLE	OEVLMOXARS0	AS		
MO	660-671		3375 KMC TELECOM III, INC. - MO	PICKERING	MAVLMOXAXMD	AS	05/17/2001	I
MO	660-927		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PICKERING	PCNGMOXARS0	AS		
MO	816-431		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PLATTECITY	PLCYMOXARS0	AS		
MO	816-858		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PLATTECITY	PLCYMOXARS0	AS		
MO	816-540		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PLEASANTHL	PLHLMOXARS0	AS		
MO	816-987		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PLEASANTHL	PLHLMOXARS0	AS		
MO	573-460		3275 FIDELITY COMMUNICATION SERVICES I, INC. - MO	RICHLAND	ROLLMOAURS0	AS	06/06/2002	I
MO	573-765		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	RICHLAND	RCLDMOXARS0	AS		
MO	573-428		9748 AMERITECH MOBILE SERVICES, INC.	ROLLA	ROLLMOXACM0	AS		
MO	573-465		6532 CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	ROLLA	ROLLMOXADS0	AS		
MO	573-466		6532 CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	ROLLA	ROLLMOXADS0	AS		
MO	573-426		3275 FIDELITY COMMUNICATION SERVICES I, INC. - MO	ROLLA	ROLLMOAURS0	AS		
MO	573-612		3375 KMC TELECOM III, INC. - MO	ROLLA	ROLLMOXAXMD	AS	05/24/2001	I
MO	573-467		6232 NEXTEL COMMUNICATIONS	ROLLA	ROLLMOBO0MD	AS		
MO	573-201		8729 SPRINT COMMUNICATIONS COMPANY, L.P. - MO	ROLLA	ROLLMOXASMD	AS	12/16/2002	I
MO	573-647		8454 SPRINT SPECTRUM L.P. - MO	ROLLA	ROLLMOAU0MD	AS		
MO	573-308		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-341		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-364		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-368		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-458		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-578		6029 SWB MOBILE SYSTEMS - MO	ROLLA	MNCHMOAQ1MD	AS		
MO	573-202		6529 T-MOBILE USA, INC.	ROLLA	STLVMOOH1MD	AS	01/02/2003	I
MO	573-782		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	RUSSELLVL	RLVLMOXARS2	AS		
MO	573-865		9748 AMERITECH MOBILE SERVICES, INC.	SALEM	ROLLMOXACM0	AS		
MO	573-453		3275 FIDELITY COMMUNICATION SERVICES I, INC. - MO	SALEM	ROLLMOAURS0	AS	06/06/2002	I
MO	573-715		3375 KMC TELECOM III, INC. - MO	SALEM	ROLLMOXAXMD	AS	05/24/2001	I
MO	573-729		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	SALEM	SALMMOXARS0	AS		
MO	573-739		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	SALEM	SALMMOXARS0	AS		
MO	573-247		6029 SWB MOBILE SYSTEMS - MO	SALEM	MNCHMOAQ1MD	AS		
MO	660-343		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	SMITHTON	SHTNMOXARS0	AS		
MO	573-571		9748 AMERITECH MOBILE SERVICES, INC.	ST ROBERT	ROLLMOXACM0	AS		
MO	573-337		6532 CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	ST ROBERT	STRBMOXARS3	AS		
MO	573-451		3275 FIDELITY COMMUNICATION SERVICES I, INC. - MO	ST ROBERT	ROLLMOAURS0	AS	06/06/2002	I
MO	573-232		3375 KMC TELECOM III, INC. - MO	ST ROBERT	ROLLMOXAXMD	AS	05/24/2001	I
MO	573-336		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ST ROBERT	STRBMOXARS3	AS		
MO	573-477		1957 SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ST THOMAS	STTMMOXARS0	AS		

Purple -Sprint MO

Pink -Other Sprint

Yellow -CLEC Current Or Near Future Basic Local Competitor

Blue -Other Wireless Not Offering Basic Local

White - CLEC Not Offering Basic Local

Data From NANPA File Update 06/03/2003

Central Office Code Assignments For Sprint MO Exchanges

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	816-680	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	STRASBURG	STBGMOXXRS0	AS		
MO	816-865	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	STRASBURG	STBGMOXXRS0	AS		
MO	660-335	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	SWEET SPG	SWSPMOXARS0	AS		
MO	660-298	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	SYRACUSE	SYRCMOXARS0	AS		
MO	573-395	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	TAOS	TAOSMOXARS0	AS		
MO	660-623	6677	DOBSON CELLULAR SYSTEMS, INC.	TARKIO	MAVLMOXBCM0	AS		
MO	660-736	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	TARKIO	TARKMOXARS0	AS		
MO	660-433	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	TIPTON	TPTNMOXARS0	AS		
MO	660-638	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	URICH	URCHMOXARS0	AS		
MO	660-238	6701	AERIAL COMMUNICATIONS	WARRENSBG	WRBGMOAK1MD	AS	06/25/2001	G
MO	660-909	6701	AERIAL COMMUNICATIONS	WARRENSBG	WRBGMOAK1MD	AS		
MO	660-262	3375	KMC TELECOM III, INC. - MO	WARRENSBG	WRBGMOXAXMD	AS	05/14/2001	I
MO	660-580	6232	NEXTEL COMMUNICATIONS	WARRENSBG	KSCYKSCV1MD	AS		
MO	660-864	6664	SPRINT SPECTRUM L.P.	WARRENSBG	INDPMOCJCM0	AS		
MO	660-422	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WARRENSBG	WRBGMOXADS0	AS		
MO	660-429	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WARRENSBG	WRBGMOXADS0	AS		
MO	660-543	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WARRENSBG	WRBGMOXADS0	AS		
MO	660-747	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WARRENSBG	WRBGMOXADS0	AS		
MO	660-441	6029	SWB MOBILE SYSTEMS - MO	WARRENSBG	WRBGMOXCH01	AS		
MO	816-441	6029	SWB MOBILE SYSTEMS - MO	WARRENSBG	WRBGMOXCH01	AS		
MO	660-223	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	WARSAW	WRBGMOXAAMD	AS	12/12/2001	I
MO	660-428	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WARSAW	WRSWMOXADS0	AS		
MO	660-438	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WARSAW	WRSWMOXADS0	AS		
MO	660-723	6029	SWB MOBILE SYSTEMS - MO	WARSAW	WRBGMOXCH01	AS		
MO	660-493	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WAVERLY	WVRLMOXARS0	AS		
MO	573-433	9760	ICG TELECOM GROUP - MO	WAYNESVL	STLSMOZC23Z	AS	06/04/2002	I
MO	573-774	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WAYNESVL	WYVLMOXARS7	AS		
MO	573-528	6029	SWB MOBILE SYSTEMS - MO	WAYNESVL	MNCHMOAQ1MD	AS		
MO	816-240	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WELLINGTON	WGTMNOXARS0	AS		
MO	816-934	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WELLINGTON	WGTMNOXARS0	AS		
MO	816-386	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WESTON	WSTNMOXARS0	AS		
MO	816-640	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WESTON	WSTNMOXARS0	AS		
MO	660-647	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	WINDSOR	WNDSMOXARS0	AS		

Purple -Sprint MO

Pink -Other Sprint

Yellow -CLEC Current Or Near Future Basic Local Competitor

Blue -Other Wireless Not Offering Basic Local

White - CLEC Not Offering Basic Local

Data From NANPA File Update 06/03/2003

Central Office Code Assignments For Exchanges Where Sprint Seeks Competitive Classification For Basic Local

State	NPA-NXX	OCN	Company	RateCenter	Switch	Use	AssignDate	Initial/Growth
MO	816-466	6530	MOBILE RADIO COMMUNICATIONS DBA MOBILFONE	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-490	6530	MOBILE RADIO COMMUNICATIONS DBA MOBILFONE	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-243	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-270	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-464	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-713	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	FERRELVIEW	FLVWMOXADS0	AS		
MO	816-902	6102	EXOP OF MISSOURI, INC.	KEARNEY	KRNYMO01DS0	AS		
MO	816-903	6102	EXOP OF MISSOURI, INC.	KEARNEY	KRNYMO01DS0	AS		
MO	816-628	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KEARNEY	KRNYMOXADS1	AS		
MO	816-635	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	KEARNEY	KRNYMOXADS1	AS		
MO	660-593	6155	GREEN HLS ARE CELL TELCO DBA GREEN HLS TELECOM SVC	NORBORNE	NRBRMO01RS0	AS		
MO	660-250	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	NORBORNE	WRBGMOXAAMD	AS	08/09/2002	I
MO	660-594	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	NORBORNE	NRBRMOXARS0	AS		
MO	816-431	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PLATTECITY	PLCYMOXARS0	AS		
MO	816-858	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	PLATTECITY	PLCYMOXARS0	AS		
MO	573-428	9748	AMERITECH MOBILE SERVICES, INC.	ROLLA	ROLLMOXACM0	AS		
MO	573-465	6532	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	ROLLA	ROLLMOXADS0	AS		
MO	573-466	6532	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	ROLLA	ROLLMOXADS0	AS		
MO	573-426	3275	FIDELITY COMMUNICATION SERVICES I, INC. - MO	ROLLA	ROLLMOAURS0	AS		
MO	573-612	3375	KMC TELECOM III, INC. - MO	ROLLA	ROLLMOXAXMD	AS	05/24/2001	I
MO	573-467	6232	NEXTEL COMMUNICATIONS	ROLLA	ROLLMOBO0MD	AS		
MO	573-201	8729	SPRINT COMMUNICATIONS COMPANY, L.P. - MO	ROLLA	ROLLMOXASMD	AS	12/16/2002	I
MO	573-647	8454	SPRINT SPECTRUM L.P. - MO	ROLLA	ROLLMOAU0MD	AS		
MO	573-308	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-341	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-364	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-368	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-458	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ROLLA	ROLLMOXADS0	AS		
MO	573-578	6029	SWB MOBILE SYSTEMS - MO	ROLLA	MNCHMOAQ1MD	AS		
MO	573-202	6529	T-MOBILE USA, INC.	ROLLA	STLVMOOH1MD	AS	01/02/2003	I
MO	573-571	9748	AMERITECH MOBILE SERVICES, INC.	ST ROBERT	ROLLMOXACM0	AS		
MO	573-337	6532	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - KS	ST ROBERT	STRBMOXARS3	AS		
MO	573-451	3275	FIDELITY COMMUNICATION SERVICES I, INC. - MO	ST ROBERT	ROLLMOAURS0	AS	06/06/2002	I
MO	573-232	3375	KMC TELECOM III, INC. - MO	ST ROBERT	ROLLMOXAXMD	AS	05/24/2001	I
MO	573-336	1957	SPRINT/UNITED TELEPHONE CO. OF MISSOURI	ST ROBERT	STRBMOXARS3	AS		

Purple -Sprint MO

Pink -Other Sprint

Yellow -CLEC Current Or Near Future Competitor

Blue -Other Wireless Not Offering Basic Local Service

White -CLEC Not Offering Basic Local

Data From NANPA File Update 06/03/2003

ATTACHMENT 4

HAS BEEN

DEEMED

HIGHLY CONFIDENTIAL