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Competitive Status for Local
Residential and Business Services

Meisenheimer/Rebuttal

Public Counsel

TO-2005-0035

REBUTTAL TESTIMONY

OF

BARBARA A. MEISENHEIMER

Submitted on Behalf of the Office of the Public Counsel

SOUTHWESTERN BELL TELEPHONE, L.P. D/B/A SBC MISSOURI
CASE NO. TO-2005-0035

December 17, 2004

NP

Exhibit No. 26
Date Premarked Case No. TO-2005-0035
Reporter _____

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

In the Matter of the Second Investigation)
into the State of Competition in the)
Exchanges of Southwestern Bell Telephone,)
L.P., d/b/a SBC Missouri.)

Case No. TO-2005-0035

AFFIDAVIT OF BARBARA A. MEISENHEIMER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

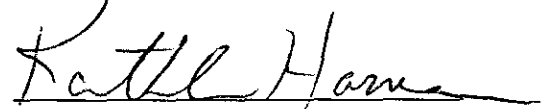
Barbara A. Meisenheimer, of lawful age and being first duly sworn, deposes and states:

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 27 and Schedules 1 through 5.
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 17th day of December 2004.

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
BARABARA A. MEISENHEIMER

Southwestern Bell Telephone, L.P. d/b/a SBC Missouri

CASE NO. TO-2005-0035

INTRODUCTION

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

3 A. Barbara A. Meisenheimer, Chief Economist-Telecommunications, Office of the Public
4 Counsel, P. O. Box 7800, Jefferson City, Missouri 65102. I am also employed as an
5 adjunct Economics Instructor for 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-
8 Columbia (UMC) and have completed the comprehensive exams for a Ph.D. in Economics
9 from the same institution. My two fields of study are Quantitative Economics and Industrial
10 Organization. My outside field of study is Statistics. I have taught Economics courses for
11 the following institutions: University of Missouri-Columbia, William Woods University,
12 and Lincoln University. I have taught courses at both the undergraduate and graduate
13 levels.

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

15 A. Yes. I have submitted well over 100 pieces of prefiled testimony to the Commission and
16 provided live testimony in dozens of proceedings. Primarily, I have testified on

telecommunications issues. However, I have also testified on issues related to natural gas, water and electric utilities.

Q. PLEASE SUMMARIZE YOUR EXPERIENCE RELATED TO TELECOMMUNICATIONS ISSUES.

A. Since 1996, I have regularly submitted testimony on behalf of Public Counsel on various telecommunications issues, including adherence to and application of the price cap statute, other competitive issues, universal service, numbering, calling scopes and rate case related issues.

Specific to satisfaction and application of the price cap statute, I testified in Case No. TO-97-397, in which the Commission approved Southwestern Bell's petition for price cap status. I also testified in case TO-2001-467 in which the Commission initially evaluated the state of competition in SBC's local telephone exchange areas. In addition, I have testified and assisted in the preparation of comments related to the price cap statute as it applies to Sprint Missouri Inc., Century-Tel, Spectra Communications, and BPS.

My experience related to other competitive issues includes but is not limited to implementation of the universal service, numbering resource, unbundling and interconnection requirements of the Federal Telecommunications Act of 1996 and the provisions of the Missouri Telecommunications Act which sought to expand local competition for instate telecommunications.

1 I have served on the Federal/State Universal Service Joint Board Staff for a number of years.

2 In this capacity, I have reviewed information on various issues related to the Federal
3 Universal Service Fund including, but not limited to, carrier eligibility, federal high cost
4 support, and the federal Lifeline and LinkUp programs. I have assisted the Federal/State
5 Joint Board in preparing recommendations for the FCC in implementing the Universal
6 Service related provisions of the 1996 Telecommunications Act. As a Federal/State Joint
7 Board staff member, I also reviewed Joint Board Monitoring Reports and FCC Telephone
8 Penetration Report designed to evaluate the performance of the Federal and state programs
9 in assisting low-income customers. At the State level, I participated in industry workshops
10 to develop recommendations on components of the Missouri Universal Service Fund. I
11 currently assist the Public Counsel in his duties as a member of the Missouri Universal
12 Service Board.

13 I am also a past member of the North American Numbering Council. The North American
14 Numbering Council advises the FCC on numbering issues related to both wireline and wireless
15 services.

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

17 **A.** To advise the Commission on the current state of competition in SBC's exchanges and to
18 respond to SBC's petition requesting the Public Service Commission to approve additional
19 competitive classifications for SBC's services pursuant to Section 392.245.5, RSMo 2000.

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

7 **Q. IN PREPARATION OF YOUR TESTIMONY, WHAT MATERIALS DID YOU**
8 **REVIEW?**

9 A. I have reviewed the direct testimony of Southwestern Bell Telephone Company witnesses
10 Craig Unruh, Silvia Acosta Fernandez, Dr. Debra Aron, Harry Shooshan, Elizabeth Stoia
11 and Sandra Moore. I have also reviewed information from the Commission, including, but
12 not limited to, portions of the tariffs and annual reports filed with the Commission by local
13 exchange companies, information regarding certifications of service authority,
14 interconnection agreements and tariff filings maintained by the Staff as well as responses to
15 data requests issued by Public Counsel and the Staff of the Missouri Public Service
16 Commission.

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

18 A. The Commission established this proceeding for the purpose of again investigating the state
19 of competition in SBC's exchanges for SBC's telecommunications services in accordance
20 with the "Price Cap Statute," Section 392.245, RSMo 2000. in order to determine whether

1 or not effective competition exists for each telecommunications service provided by SBC in
2 each SBC exchange.

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

4 **A.** The full text of the Subsection 5 of Section 392.245 is the focus of this case. I have
5 highlighted the portion of statute that my testimony will primarily address. Section
6 392.245.5 states:

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

1 **longer exists for the incumbent local exchange telecommunications**
2 **company in such exchange, it shall re-impose upon the incumbent local**
3 **exchange telecommunications company, in such exchange, the**
4 **provisions of paragraph (c) of subdivision (2) of subsection 4 of section**
5 **392.200 and the maximum allowable prices established by the**
6 **provisions of subsections 4 and 11 of this section, and, in any such case,**
7 **the maximum allowable prices established for the telecommunications**
8 **services of such incumbent local exchange telecommunications**
9 **company shall reflect all index adjustments which were or could have**
10 **been filed from all preceding years since the company's maximum**
11 **allowable prices were first adjusted pursuant to subsection 4 or 11 of**
12 **this section.** " (emphasis supplied.)

13 **Q. PLEASE EXPLAIN WHY YOU EMPHASIZED PORTIONS OF THE STATUTE IN**
14 **YOUR TESTIMONY IN BOLD TEXT.**

15 **A.** The Commission is at an intermediate step in the process of transitioning from price caps to
16 a greater reliance on effective competition to sustain pricing constraints. The Commission
17 has already met the initial hurdle of within a 5-year window evaluating the state of
18 competition for each of SBC's telecommunications services in each exchange In TO-
19 2001-467, the Commission determined, after notice and hearing, that effective competition
20 did exist for some services in a limited number of exchanges. A list of these services and
21 the relevant exchange is provided later in this testimony. Likewise, in TO-2001-467, the
22 Commission determined, within the initial 5-year window, after notice and hearing, that
23 effective competition did not exist for basic local residential and business services and other
24 local services in the majority of SBC's local telephone exchange areas. In this case, the
25 Commission is not bound by the initial 5-year requirement and is instead responding to
26 SBC's request consistent to its ongoing responsibility to occasionally review the state of
27 competition. I believe it is also reasonable that the scope of this case also include

1 reconsideration of the status of effective competition for those services in those exchanges
2 for which SBC has previously been granted competitive classifications. Such
3 reconsideration of the status of effective competition is allowed according to the third
4 portion of the price cap statute that is shown in bold text above.

5 **Q. WHICH PARTY BEARS THE BURDEN OF PROOF IN DETERMINING WHETHER**
6 **OR NOT EFFECTIVE COMPETITION EXISTS FOR A SERVICE IN A**
7 **SPECIFIC EXCHANGE?**

8 A. I am not an attorney, however, the Report and Order in TO-2001-467 addresses that issue:
9 "Generally, the party seeking relief from the Commission bears the burden of proof. The burden of
10 proof remains upon the party asserting the affirmative of the ultimate issue throughout a
11 proceeding." As I understand it, SBC has the burden to persuade the Commission to determine that
12 effective competition exists for a service in an exchange for which effective competition was found
13 not to exist.

14 **Q. EVEN THOUGH THERE WOULD BE NO SUBSTANTIAL CONSEQUENCE IN THIS**
15 **CASE, WOULD YOU ADVISE THE COMMISSION TO REAFFIRM THAT**
16 **EFFECTIVE COMPETITION DOES NOT EXIST FOR ANY ADDITIONAL**
17 **SERVICES IN EXCHANGES NOT SPECIFICALLY FOUND TO FACE**
18 **EFFECTIVE COMPETITION IN THIS CASE?**

19 A. I believe for clarity in this ongoing process, the Commission should consider taking this
20 opportunity to reaffirm that effective competition does not exist for those services and in
21 those exchanges other than those for which effective competition has been found to exist.

1 Q. WHY MIGHT THE COMMISSION WANT TO MAKE A FINDING THAT
2 EFFECTIVE COMPETITION DOES NOT EXIST FOR THOSE SERVICES AND
3 IN THOSE EXCHANGES OTHER THAN THOSE FOR WHICH EFFECTIVE
4 COMPETITION HAS SPECIFICALLY BEEN FOUND TO EXIST?

5 A. By reaffirming its previous findings regarding a lack of effective competition, the
6 Commission can avoid potential confusion regarding its compliance with the requirement
7 for an initial review to be conducted within 5-years.

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

10 A. In my opinion, the statute sets forth reasonable requirements and consumer protections that
11 allow an incumbent local exchange carrier greater flexibility in an effectively competitive
12 environment and also minimizes the use of unnecessary resources. While the statute serves
13 to accommodate effective competition for services, it also clearly envisions that effective
14 competition may not develop within all exchanges or for all services. It recognizes that
15 there is no certainty of effective competition on an ongoing basis.

16 Section 392.245.5 initially protects the development of competition and protects consumers
17 by requiring that within the first five of existence of a certified alternative basic local
18 exchange company (ALEC) in the exchange a service may not be automatically granted
19 competitive status. Instead, the Commission must first conduct a proceeding to investigate
20 and make a determination of whether or not effective competition exists for the service. If
21 the Commission determines that effective competition exists, then the incumbent company

1 gains competitive status for the relevant service. The Commission has already fulfilled this
2 component of the statute as it applies to SBC.

3 Following the initial determination regarding each service in each exchange, periodic
4 reviews are conducted to ensure that effective competition still exists thereby warranting
5 continued full flexible pricing status for the incumbent. In this case, the Commission may
6 consider if effective competition continues to exist for a service if it is that SBC no longer
7 faces effective competition in an exchange.

8 After the first five years during which an ALEC has provided service in an exchange, the
9 incumbent can petition for competitive service status. Under that circumstance, the petition
10 may be granted without a mandatory review if unchallenged. This aspect of the statute
11 works to eliminate unnecessary reviews thus conserving regulatory and carrier resources.
12 This is the scenario I believe is currently before the Commission.

13 **Q. IF THE COMMISSION FINDS OR REAFFIRMS THAT EFFECTIVE**
14 **COMPETITION DOES NOT EXIST FOR A SERVICE IN AN EXCHANGE AT**
15 **THIS TIME, HOW CAN SBC ATTEMPT TO GAIN COMPETITIVE STATUS FOR**
16 **SERVICES IN THE FUTURE?**

17 **A.** Just as SBC did in this case. An ongoing process is available if an ALEC has been providing basic
18 local service in the exchange for at least five years. An ILEC can re-petition for competitive service
19 status for the service in the exchange.

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

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

1 Q. DURING THE INITIAL INVESTIGATION INTO THE STATE OF
2 COMPETITION IN SBC'S EXCHANGES, FOR WHICH OF SBC'S SERVICES
3 AND IN WHICH EXCHANGES DID THE COMMISSION FIND THAT EFFECTIVE
4 COMPETITION EXISTED?

5 A. Southwestern Bell sought a competitive classification for local services and for several non-
6 local services on a statewide basis. The Commission found that effective competition
7 existed for the following services.

- 8 1) The core business switched services in the Kansas City and St. Louis exchanges.
- 9
- 10 2) The business line-related services in the Kansas City and St. Louis exchanges.
- 11
- 12 3) The directory assistance services for business customers in the Kansas City and St.
- 13 Louis.
- 14
- 15 4) Busy Line Verification and Busy Line Interrupt services for business customers in the
- 16 Kansas City and St. Louis exchanges.
- 17
- 18 5) The residential access line services in the Harvester and St. Charles exchanges.
- 19
- 20 6) The residential access line-related services in the Harvester and St. Charles exchanges.
- 21
- 22 7) The Optional Metropolitan Calling Area service for residential customers in the
- 23 Harvester and St. Charles exchanges.
- 24
- 25 8) The directory assistance services for residential customers in the Harvester and St.
- 26 Charles exchanges.
- 27
- 28 9) The Busy Line Verification and Busy Line Interrupt for residential customers in the
- 29 Harvester and St. Charles exchanges.
- 30
- 31 10) Common Channel Signaling/Signaling System 7 services in all SBC's
- 32 exchanges.
- 33
- 34 11) Line Information Database in all SBC's exchanges.

1
2 Q. IF THE ULTIMATE OUTCOME OF THIS PROCEEDING IS A DETERMINATION
3 THAT ANY ADDITIONAL SBC SERVICES ARE SUBJECT TO EFFECTIVE
4 COMPETITION IN AN EXCHANGE, SHOULD ANY ADDITIONAL PRICING
5 RESTRICTIONS BE IMPOSED ON SBC PRIOR TO ALLOWING IT
6 FLEXIBILITY FOR THE SERVICE IN THE RELEVANT EXCHANGE?

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

8 Q. WHAT TYPES OF EVIDENCE WOULD YOU FIND PERSUASIVE IN
9 DEMONSTRATING THAT AN ALTERNATIVE BASIC LOCAL EXCHANGE
10 CARRIER IS "PROVIDING" SERVICE IN AN EXCHANGE.

11 A. Based on my investigation in the previous case, I found that simply demonstrating that a
12 carrier was certified or that the Commission at some point approved a tariff does not in
13 itself demonstrate that an alternative local exchange carrier is actually providing basic local
14 service. For example, many carriers that initially sought certification never completed the
15 series of remaining steps necessary to actually serve customers such as securing
16 interconnections that codify the terms and conditions for the exchange of traffic over the
17 telecommunications network or setting forth the terms of service in a required tariff filing.
18 Even when a carrier has been certified and has approved tariffs on file, services are not
19 always provided throughout the area for which the tariff applies and tariffs are not always
20 withdrawn when a carrier cancels its service offerings in an area or goes out of business
21 entirely. Additionally, the existence of alternative facilities in the exchange, such as

1 switching equipment or fiber networks, alone does not ensure that the facilities are actually
2 being used to provide an alternative basic local service.

3 In this case, a more complete investigation reveals that even the list of directory listings
4 attached to Mr. Unruh's testimony is inadequate to demonstrate that a carrier is providing
5 service. As I will discuss later, a number of the carriers from Mr. Unruh's directory listing
6 are not providing service despite appearing in the directory.

7 I believe that acknowledgement by the competing carrier that it serves customers in an
8 exchange is the surest method for demonstrating that the "providing" requirement is met.
9 Other evidence of "providing service" would be verifiable information that the incumbent
10 provides more than an insignificant number of resold lines or unbundled network elements
11 in the relevant exchange.

12 Q. WHY IS THERE DIFFERENT TREATMENT FOR SBC THAN ITS
13 COMPETITORS?

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

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

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

18 For decades, SBC has enjoyed an exclusive service territory in the State of Missouri,
19 developing longstanding relationships with customers and, albeit under regulatory
20 oversight, generally becoming known for ubiquitous basic local service offerings, affordable

1 prices, reliable services, and timely installations and repairs. Reasonably, these attributes
2 constitute a significant competitive advantage over lesser-known competitors. I believe
3 dissatisfaction with slamming, cramming, and a continuous stream of sales calls during the
4 dinner hour have also made less sophisticated telecommunications users wary (and weary)
5 of changing providers. This also obviously works to the advantage of an incumbent
6 monopoly when its market is opened to alternative providers. It is also imperative to
7 consider issues of market dominance and the potential for SBC, either alone or in concert
8 with other carriers, to successfully exert market power once SBC is released from price
9 caps.

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

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

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

19 (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 SBC'S EXCHANGES IN TERMS OF THE CRITERIA FOR "EFFECTIVE COMPETITION" LISTED IN SECTION 386.020(13), RSMO.

A. SWBT again falls short in meeting the criteria for effective competition for local service. SBC continues to present generalized information and not specific exchange-based data on the elements relevant to an effective competitive analysis. SBC continues to retain significant control over the local loop for both residential and business service in the vast majority of its exchanges. Customers have long been captive to the company that controls the loop. Alternative providers for local service must win away those captive customers. In the local market, alternative local exchange providers have made only minor inroads, and virtually no progress in the residential market. Recent FCC decisions removing UNE, unbundling obligations and wholesale discounts for residential lines further diminish the future of residential competition.

While alternative providers compete with SWBT in some exchanges for business service, there is an absence of equivalent or substitutable service available to residential customers and small business customers at comparable rates, terms and conditions. The prepaid service providers

1 appear to constitute the lion's share of available alternatives to residential consumers. But that
2 service is designed and marketed to customers with credit problems. Customers pay an exorbitant
3 amount for prepaid service and do not receive the full range of services as available under SWBT's
4 local service. Mandatory toll blocking and restricted access to 0+ and 1+ calls do not make the
5 prepaid service a functionally equivalent service at comparable rates, terms and conditions.

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

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

14 Cellular service is not a functionally equivalent or substitute service as set forth in Section
15 386.020.13, RSMo 2000 since it does not meet the same criteria for 911 service or access to
16 a presubscribed interexchange carrier that wireline service provides. In addition, cellular
17 carriers generally do not recognize the Commission's regulatory authority in the coverage,
18 price, terms or conditions or even reporting of wireless service offerings. Wireless
19 companies require long-term contracts in excess of a year to obtain a reasonable price and
20 service package. Cellular companies require use of specific brands of customer equipment
21 so a change in carriers requires a change in equipment. Based on my experience, I believe
22 that generally consumers do not use cellular phones as a substitute for landline basic local

1 service to their home. Instead, consumers primarily rely on cellular as a mobile connection
2 to the network and as a means to avoid toll charges for placing calls outside the landline
3 local calling scope. This is especially true in the rural areas. Neither purpose is an attribute
4 of basic local service. For these reasons, I believe it would be inappropriate and contrary to
5 the Commission's charge to give the existence of cellular service much weight in its
6 determination of effective competition for basic local service.

7 E-mail cannot reasonably be classified as the functional equivalent of voice communication.

8 The same can be said about text messaging via wireless phones. Voice telephoning over
9 the internet suffers from poor signal quality and is not a functional equivalent. As far as
10 consumer perception of VIOP, VOIP is still a new option for consumers and the greater
11 number of telephone consumers have not had sufficient experience with it so they can make
12 an informed judgment on its substitutability.

13 Section 392.185, RSMo. sets out the purposes of Chapter 392, RSMo. and is the best
14 statement of the intent of regulation in Missouri. The level of competition in the SBC
15 exchanges has not fulfilled or advanced meaningfully these goals. SBC's price cap
16 regulatory scheme has as its purpose flexibility for downward pricing to meet competition.

17 This has not occurred to any significant degree. In fact, rates for many services, including
18 basic local service have increased under the pricing options available to SBC under the
19 price cap statute. SBC has not taken advantage of the price flexibility under the price caps
20 which leaves me to believe that the outcome of the reclassification is not flexibility to meet

1 competition at lowered prices, better service, and more options, but instead provides an
2 unfettered opportunity to raise prices for services with little or no competition.

3 After consideration of the data presented here about CLECs and their operations in SBC exchanges,
4 and the other considerations relevant to effective competition, I believe that the Commission should
5 decline to declare additional SBC basic local business and associated services competitive. The
6 possible exceptions would be multi-line business services in Harvester, Fenton, Chesterfield,
7 Greenwood, Valley Park and Manchester. In these exchanges, there appears to be a reasonable
8 amount of fully facilities based competition for landline service coupled with UNE-P and resale
9 offerings. This provides some comfort that sustainable competition exists for services offered to
10 multiline business customers. However, I believe that the Commission should give weight to the
11 testimony of CLECs operating in these areas regarding any barriers that they face or other factors
12 that may limit their ability to compete prior to granting a competitive classification.

13 **Q. HAVE YOU PERFORMED ANY ANALYSIS THAT CAN ASSIST THE**
14 **COMMISSION DETERMINE WHETHER EFFECTIVE COMPETITION EXISTS IN**
15 **SBC'S EXCHANGES FOR WHICH IT SEEKS A COMPETITIVE**
16 **CLASSIFICATION?**

17 **A.** Yes. I considered information from a number of sources, including information regarding
18 access line counts provided by SBC, Annual Reports, and Central Office Code Assignment
19 data available from the NANPA webpage.

20 **Q. PLEASE DESCRIBE YOUR ANALYSIS.**

1 A. Although it is in and of itself not conclusive, one indicator of market dominance (and in
2 turn, the absence of effective competition) is the Herfindahl-Hirschman Index. (HHI) It is
3 calculated as the sum of the market shares squared for firms in what is determined to be the
4 relevant geographic and product market. In this case, I believe it is relevant to consider both
5 the statewide market and a geographic market defined at the exchange level. The statewide
6 market can provide some insight as to the degree to which CLECs have been effective in
7 establishing a statewide presence. This will help to demonstrate the likelihood of effective
8 competition to develop across the state and not simply in isolated pockets. While based on
9 the statute, it appears that evaluating the extent to which effective competition exists at the
10 exchange level, in my opinion, it is also worthwhile to consider the extent to which CLECs
11 have committed to provide services throughout Missouri.

12 Although consumers do not buy access lines, access lines or "loops" provide the conduit for
13 carriers to offer consumers a multitude of services, including local services, toll services,
14 operator services, directory services, and a host of custom calling features. That same
15 conduit is required by other carriers to terminate calls. Historically, incumbent local
16 exchange carriers such as SWBT have retained virtually exclusive control of this bottleneck
17 facility. This provides the potential for SWBT to exercise some form of market power in
18 the provisioning of virtually every intrastate retail or wholesale service offered over the
19 switched network within its exchanges, potentially allowing SWBT to overcharge both
20 retail consumers and wholesale consumers and ward off meaningful competition. The 1996

1 Federal Telecommunications Act attempted to address this concern by requiring the
2 incumbents to open their markets to competition, including the requirement that the
3 incumbent lease parts of its network to competitors. Senate Bill 507 attempted to mitigate
4 potential market power by imposing restrictions in the form of price caps that would impose
5 an upper bound on the incumbent while also allowing the incumbent an opportunity to
6 respond to competitive pressures to lower price.

7 Although competitive basic local service providers have met with some success in acquiring
8 market share in some exchanges, the local service market remains highly concentrated and
9 SWBT continues to dominate the business market and monopolize the residential market on
10 a statewide basis. In total, an estimate of SWBT's share of statewide business access lines
11 is ** _____ ** (See, Schedule BAM-4HC) For residential SWBT's share of
12 statewide access lines is ** _____ * based on SBC reported line counts less prepaid
13 offerings. SBC's share of the statewide residential local market dwarfs the combined total
14 of its CLEC competitors including prepaid, regular resale, UNE-P, and CLEC switched
15 service as estimated based on the number of E-911 listings. (See, Schedule BAM-3HC) On
16 an exchange basis SWBT's market share of total residential access lines in ** _____
17 _____ ** the roughly 80% measure of market share
18 that the FCC found to indicate that AT&T monopolized the interstate, domestic,
19 interexchange market in 1993. (See Schedule BAM-3HC) Estimates indicate that for
20 residence access lines ** _____

1 _____ ** the 1800 threshold
2 which indicates a highly concentrated market. The HHI floor for SWBT's market share of
3 business access lines, ** _____
4 _____
5 _____ ** (See, Schedule BAM-4HC) CLEC market share based
6 on access lines served at least partially by UNEs or exclusively over the CLECs own
7 facilities produces even higher HHI indicators of market concentration. (See Schedule
8 BAM-3HC and BAM-4HC) The information contained in Schedule BAM-3 HC and
9 Schedule BAM-4 HC is based on SWBT line count data and CLEC line counts provided by
10 SWBT to the Staff and Public Counsel.

11 Another source of information I reviewed but did not rely on as heavily in this case as in
12 TO-2001-467 is numbering assignment data from NANPA identifying which CLECs have
13 received numbering resources in anticipation of servicing customers using their own
14 switching facilities. The insight provided by this information is somewhat diminished since
15 the Commissions last review of the state of competition in SBC's exchanges. Due to the
16 implementation of number pooling the informational content of NXX assignments is diluted
17 due to sharing of NXX codes by landline carriers offering service in the same rate center. I
18 would point out that my review of this information does raise concerns regarding Craig
19 Unruh's schedule Unruh – Schedule 5 that purports to show rate center numbering
20 assignments associated with competitors in SBC's exchanges. Based on a review of

1 numbering assignments I found cases where CLECs have numbers assigned in exchanges
2 that are not included in the list of exchanges they serve according to the CLEC's own
3 tariffs. Intermedia, for numerous rate centers, appears to be one such example. It may be
4 that affiliated carriers are utilizing codes assigned to Intermedia. Mr. Unruh's maps also
5 appear to include the existence of wireless carriers as well as wireline. For example, Mr.
6 Unruh indicates that Vienna has competitive numbering resources assigned to it. Upon
7 review of the numbering assignments I found that the only carrier besides SBC with a code
8 assigned in Vienna is Verizon Wireless. Mr. Unruh's Schedule 5 should not be relied upon
9 as definitive in establishing that CLECs are provisioning on a facilities basis in a particular
10 exchange.

11 I have also reviewed CLEC tariffs and ALEC annual reports. Comparing this to SWBT
12 witness Craig Unruh's schedules Unruh - Schedule 7 and Unruh - Schedule 8, regarding
13 the number and offerings of CLEC competitors, I discovered that in numerous cases the
14 CLECs identified as providing service in Missouri are not. For example, he lists numerous
15 carriers with cancelled certificates for both business and residential including Tel-Link,
16 Quintelco, Net-Tel and IG2. (See, Commission Staff information regarding cancellations in
17 Schedule BAM-6.)

18 Another area of concern with Mr. Unruh's schedules relates to the thick attachment of
19 directory pages purporting to demonstrate the CLECs that hold themselves out to offer
20 service in SBC's exchanges. I found a comparison of these listings to be a strong indication

1 of how bleak the competitive landscape in Missouri generally is rather than evidence of
2 robust competition. A large portion of the listings are for prepaid services. Other companies
3 listed are piece parts of larger entities due to mergers or acquisitions. Some "providers" on
4 SWBT's lists are in bankruptcy or their certificate has been cancelled. Some simply no
5 longer provide service in Missouri. Examples of discrepancies between actual service
6 offering availability for carriers shown in Mr. Unruh's schedule of directory listings is
7 provided in Schedule BAM-1HC and BAM -2HC of my testimony.

8 The weight of the evidence I found and have provided here demonstrates that SBC's
9 information and evidence creates a picture of the "paper competition" versus the reality of
10 the lack of competition faced by Missouri's residential and low use business customers.
11 Although CLECs may be certified and may have tariffs filed, that does not mean that they
12 are actually providing service or providing service at a level that constitutes effective
13 competition. The Commission should not be persuaded by SBC's exaggerated claims of a
14 strong competitive market in Missouri. I recommend that the Commission reject SBC's
15 petition for competitive classification of basic local residential service and the other services
16 closely associated with it including vertical services, service packages, local operator, local
17 directory, directory listings and flat-rate or discounted local services established by the
18 Commission to satisfy local calling needs.

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

4 A. The loop continues to be a bottleneck facility primarily controlled by SBC. The HHI
5 analysis I conducted on an exchange-by-exchange basis shows that the market for
6 residential basic local services is highly concentrated and not subject to effective
7 competition. Business services in the majority of exchanges are still dominated by SBC.
8 Notwithstanding the potential exceptions I identified earlier in my testimony, I would not
9 recommend approving a competitive classification in this proceeding.

10 Q. WHAT ARE THE IMPLICATIONS OF YOUR STUDY ON SERVICES OTHER
11 THAN BASIC LOCAL SERVICE?

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

16 Q. SBC WITNESS ELIZABETH STOIA INDICATES ON PAGE 2 OF HER
17 TESTIMONY THAT SHE WILL DISCUSS A CATEGORY OF RESIDENTIAL
18 SERVICE CALLED RESIDENTIAL ACCESS LINES INCLUDING DIAL TONE
19 AND LOCAL USAGE. DOES SBC OFFER "RESIDENTIAL ACCESS LINE
20 SERVICE"?

21 A. No. An SBC access line or "loop" is a connecting facility between the Company's local switching
22 office and a customer's premise. The access line facility is used to provide a variety of services to

1 different customers. Certainly, one such customer is a subscriber to the Company's basic local
2 service. Basic local service includes dial tone and usually unlimited local calling within the local
3 calling scope for a flat rate. In this case, SBC acts as a retail provider. One of the other types of
4 customers that SBC serves with access lines are interexchange carriers. Interexchange carriers pay
5 to use the Company's access line facilities to originate and terminate incumbent's long distance
6 messages. Another customer SBC might serve with its access line is a competitive or an alternative
7 local exchange provider. In the two previous examples SBC acts as a wholesale provider.

8 Ms. Stoia's testimony appears to focus on a comparison of the price of bundled service offerings
9 and on emphasizing services that in some cases have limited substitutability for consumers. While I
10 acknowledge that many customers like the convenience of bundled products, and have access to and
11 are comfortable with newer technologies, I believe Ms. Stoia's analysis glosses over some
12 important consideration

13 I did not find a comparison of the lowest cost option for local calling as an exhibit to Ms. Stoia's
14 testimony despite that the availability and affordability of such a service was a primary goal related
15 to implementing the provisions of the federal and state universal service funds. Universal service
16 and Price Caps each offer a protection for the customer who choose to purchase basic local service
17 or can only afford it as a stand-alone service. The goal of universal service is to promotes the
18 ubiquitous availability and affordability of a core set of basic services. Currently the definition of
19 the core set of universal services aligns well with basic local service as a stand-alone service.

20 SBC already has the authority to lower rates to meet competition and to assemble bundled
21 offerings. SBC has not used that flexibility very often since it came under price cap regulation. The

1 history of rates under price cap regulation has seen a generally steady trend upward. There has
2 been little discipline exercised by competition.

3 There is a real risk that SBC will attempt to increase rates for such services as local basic service
4 more than the CPI-TS and increase nonbasic service rates more than the 8% cap per 12-month
5 period. If the Commission approves SBC petition, it is difficult to see how competition will
6 discipline prices and protect the basic local service customer from escalating rates beyond the
7 consumer price index rates.

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

9 **A.** Yes, it does.

Local Service Alternatives

You now have a choice of local telephone service providers. At the time this directory was published, the following companies, in addition to SBC Missouri, offer local service in this area and requested that their listings appear in this SBC Missouri directory.

Detailed information about the availability of local service from companies other than SBC Missouri may be obtained directly from these companies.

 <p>AT&T Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>	 <p>BULLSEYE TELECOM Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>
 <p>DELTA PHONES, INC. Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>	 <p>COMM SOUTH Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>
 <p>intermedia Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>	 <p>MaxCom Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>
 <p>Pionex Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>	 <p>BULLSEYE TELECOM Residential Service Business Service Long Distance Service Internet Service Voice Mail Service Fax Service Video Service Data Service Security Service Energy Service Health Service Travel Service Automotive Service Pet Service Home Improvement Service Financial Service Insurance Service Legal Service Medical Service Religious Service Social Service Volunteer Service Other Service</p>

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BTC- Ceased doing business 12/31/2002.

COMM SOUTH- Residential only. Called twice elevator music for about 10 minutes. 2003 Annual Report shows no access lines. Accepting new customers.

intermedia- Annual Report does not report access lines. No Residential St. Louis, KC and Springfield Only.

MaxCom- No currently effective tariff or Annual Report. When dialed, told to call 1-900-622-8000. Assumed a toll call.

AT&T- Not seeking new residential customers in MO.

BULLSEYE- Called. Not serving residential or business customers in MO. Recurring Tariff Rate \$70.

Delta Phones- No 2003 Annual Report. The number listed is out of service.

ionex- **
**
**
**access lines.

Max-Tel- No Annual Report. When called, referred to same number as Maxcom.

MyLine- Called Not accepting new customers.

One Choice- Called, Not accepting new customers.

QCC- Prepaid, 2003 Annual Report, no access lines. Called, now called Cinergy, not accepting MO customers.

CUSTOMER GUIDE

Local Service Alternatives

Max-Tel Communications, Inc. Long-Distance Service Business Service Customer Service Phone 1-800-227-2111 1-800-227-2111 1-800-227-2111	McLeodUSA Home Phone & Toll Service Long-Distance Service Customer Service Phone 1-800-909-5010 1-800-909-5010 1-800-909-5010
MyLine Long-Distance Service Business Service Customer Service Phone 1-800-227-2111 1-800-227-2111 1-800-227-2111	Navigator Telecommunications, LLC Home Phone & Toll Service Long-Distance Service Customer Service Phone 1-800-909-5010 1-800-909-5010 1-800-909-5010
ONE Long-Distance Service Business Service Customer Service Phone 1-800-227-2111 1-800-227-2111 1-800-227-2111	Reconex Home Phone & Toll Service Long-Distance Service Customer Service Phone 1-800-909-5010 1-800-909-5010 1-800-909-5010
QCC Long-Distance Service Business Service Customer Service Phone 1-800-227-2111 1-800-227-2111 1-800-227-2111	1-800-Reconex Home Phone & Toll Service Long-Distance Service Customer Service Phone 1-800-909-5010 1-800-909-5010 1-800-909-5010

McLeodUSA-2000 Net Income **

Navigator-PFB, 2000 Net Income **

** In 2003
1,634 Residential lines.

Phone For All- Prepaid. No currently effective tariffs or Annual Report. However, indicates it is accepting new customers.

1-800-Reconex- Prepaid, 2003 Annual Report- 176 access lines statewide, resale only.

Schedule BAM REB- 1A.2 NP








Local Service Alternatives

877-RingAgain-
Recurring monthly
service charge \$48

Southwest
TeleConnect - Prepaid.
No currently effective
tariffs or Annual
Reports. Accepting
customers. \$44.95
plus \$59 activation
fee.

Sure-Tel- Prepaid, No
2003 Annual Report.
Called numerous times
but the call could not
be completed.

Universal Telephone -
Prepaid. No currently
effective tariffs or
Annual Reports.
Number disconnected.

 <p>New Service 1-877-748-4842 Customer Service 1-888-888-8883 Repair 1-888-843-1843 www.877ringagain.com</p>	 <p>Mail Order 1-214-499-4700 Business Service 1-214-499-4700 Late 1-214-499-4700 Tel-Ace 1-888-888-8883 Personal Service (All Fees) 1-888-888-8883 Service Repair (All Fees) 1-888-888-8883</p>
 <p>Prepaid Residential Service Res. Sales & Cust. Serv. 1-888-888-8883 Post Expense Later Invoic 42 1-888-888-8883 Repair Service 1-888-888-8883</p>	 <p>Customer Service 1-888-888-8883 Billing 1-888-888-8883 Repair 1-888-888-8883</p>
 <p>Residential Office 1-888-888-8883 Business Office 1-888-888-8883 Home 1-888-888-8883 R R R R R R R</p>	 <p>Customer Service 1-888-888-8883 Web Inquiries www.ta.com</p>
 <p>Business Office 1-888-888-8883 Residential Service 1-888-888-8883 Repair Service 1-888-888-8883</p>	

Sage- Business and
Residential

State Discount
Telephone- Prepaid,
2003 Annual Report
28 SBC Resold
Residential Lines.

Talk.com- Accepting
new customers. Must
have an SBC number
first, \$52.95/month.

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Local Service Alternatives

You now have a choice of local telephone service providers. At the time this directory was published, the following companies, in addition to SBC Missouri, offer local service in this area and requested that their listings appear in the SBC directory.









Detailed information about the availability of local service from companies other than SBC Missouri may be obtained directly from these companies.

AT&T- Not seeking new residential customers in MO.

Birch- Only Kansas City and St. Louis.

BULLSEYE- Called, Not serving residential or business customers in MO. Recurring Tariff Rate \$70.

COMM SOUTH- Prepaid, No Bus, Called twice elevator music for about 10 minutes, 2003 Annual Report shows no access lines. Accepting new customers.

 <p>SBC Residential - Land & Long Distance Business - Land & Long Distance Mobile Phone Residential Calling Card Corporate Calling Card Toll-Free Customer Service Data & Internet Services</p> <p>1-800-443-4434 1-800-443-4434 1-800-443-4434 1-800-443-4434 1-800-443-4434 1-800-443-4434 1-800-443-4434</p>	 <p>BIG RIVER For all your business and residential telecommunications needs JANIS L. LIPP Real People. Real Service. Real Simple.</p>
 <p>Baylor Business Office Business Service Customer Service Repair Service</p> <p>814-621-7623 1-800-647-6848 1-800-775-4724</p>	 <p>Baylor Residence Service Customer Service Repair Service Corporate Office</p> <p>1-800-417-6820 1-800-480-0225 1-800-743-4235</p>
 <p>BULLSEYE TELECOM Data Customer Service</p> <p>1-877-667-6666 (1-877-667-6666) (1-877-667-6666) (1-877-667-6666)</p>	 <p>CINERGY COMMUNICATIONS Business Office Residential Business Single and Payper</p> <p>1-800-489-2000 1-800-489-2000 1-800-489-2000</p>
 <p>COMM SOUTH Establishing or Changing Repair Service Billing Information</p> <p>1-800-626-0223 1-800-626-0223 1-800-626-0223</p>	 <p>DELTA PHONES, INC. Toll-Free</p> <p>1-800-614-6623</p>

CUSTOMER GUIDE

BIG RIVER- Accepting new customers. No annual report for 2003.

BTC- Ceased doing business 12/31/2002.

Cinergy- Called, No Residential in MO.

Delta Phones- Number is out of service.

Global Crossing-
Business Only, Served
6,681 lines in 2000; by
2003 Annual Report,
only 676 business
access lines.





ionex- **

McLeodUSA- 2000 Net
Income **

** In 2003,

Navigator- PFB, 2000 Net
Income \$454,888 Resale
Bus & Res, Res FB, 1 FB
Bus. In 2003 1,634
Residential lines.

Local Service Alternatives

 Global Crossing Business Office Customer Service 1-800-414-1270	 intermedia Business Customer Repair Service 1-800-859-8888 1-800-859-8889
 ionex One number access to your business needs. 1-800-859-8888	Max-Tel Communications, Inc. Residential Service Business Office Customer Service Repair 817-437-6148 1-800-859-8888 1-800-859-8889
 McLeodUSA Toll-Free Phone & Data Services 1-800-859-8888 Business Phone & Data Services 1-800-859-8888 Customer Information 1-800-859-8888	MyLine Best Information New Service Customer Service Web Address 1-877-882-6546 1-877-882-6546 www.mylinetel.com
Navigator Telecommunications, LLC Business Office Business Service Residential Service Repair Service 1-800-859-8888 1-800-859-8888 1-800-859-8888	NUVOX New Business Service Customer Care 1-800-859-8888 1-800-859-8888 www.nuvotel.com

intermedia- Annual
Report does not report
access lines. No
Residential St. Louis,
KC and Springfield -
Only.

Max-Tel- Number
transfers to 1-900-622-
8000. Assumed a toll
call.

MyLine- Not
accepting new
customers

Nuvox- Business Only
- 2003 Annual Report
- Approx. 33,000
access lines.








Local Service Alternatives

One Choice- Called,
Not accepting new
customers.

1-800-Reconex-
Prepaid, 2003 Annual
Report- 176 access
lines statewide, resale
only.

877-RingAgain-
Recurring monthly
service charge \$48

Southwest
TeleConnect - Prepaid.
No currently effective
tariffs or Annual
Reports. Accepting
customers. \$44.95
plus \$59 activation
fee.

 ONE New Service Customer Service Web Address 1-800-228-7725 1-800-244-8222 www.one.com	 Phone For All Pre-Paid Home Telephone Service Residential Services - English Residential Services - Spanish Repair Service 1-800-477-1882 1-800-228-0900 1-800-228-0810
 1-800-Reconex National Office New Sales Customer Service 1-800-733-8870 1-800-876-8238	Ren-Tel Communications, Inc. Customer Service 1-877-673-8338
 877-RingAgain New Service Customer Service Repair 1-877-346-4342 1-800-228-8943 1-800-443-1841 www.877ringagain.com	 State Discount Telephone Main Number Business Service Local Toll-Free Residential Service (Toll Free) Service Repair (Toll Free) 1-814-686-4760 1-814-182-6760 1-800-228-8121 1-800-873-3745 1-800-648-4940
 Southwest TeleConnect Prepaid Residential Services New Sales & Cust. Serv. (From Resold Lines Only AT) Repair Service 1-800-622-2542 1-800-622-2540	 State Discount Telephone Customer Service Billing Repair 1-800-222-0041 1-800-222-0041 1-800-803-0041

CUSTOMER GUIDE

Phone For All-
Prepaid, No currently
effective tariffs or
Annual Report.
Indicates accepting
new customers.

Ren-Tel- 372 Access
lines. Accepting
customers.

Sage- Business and
Residential




State Discount
Telephone- Prepaid,
2003 Annual Report
28 SBC Resold
Residential Lines.

Local Service Alternatives

Sure-Tel- Prepaid, No
2003 Annual Report .
Called numerous times
but the call could not
be completed.

TCG- Metro KC and
St Louis Business
Only

CUSTOMER SERVICE

 <p>Customer Service: 1-800-767-8632 Customer Service: 1-800-767-8632 Customer Service: 1-800-767-8632</p> <p>*****</p>	 <p>Customer Service: 1-800-488-9988 Web Address: www.talk.com</p>
 <p>Customer Service: 1-800-646-7000 (1-800-627-8634)</p>	

Talk.com- Accepting
new customers. Must
have an SBC number
first, \$52.95/month.

Updates To CLEC Review Conducted In TO-2001-467

CLEC Name	Remarks
1-800 Reconex, Inc. (Formerly Sterling International Funding, Inc., d/b/a Reconex) P. O. Box 40 2500 Industrial Avenue Hubbard, OR 97032	Prepaid, I called 1-800-reconnex and got a message that if I dialed one at anytime I could get the correct number from an automated system but I would be billed \$2.99 on my local phone bill. If I had a rotary dial phone I could stay on the line. (I assume it would have also been billed) Or I could dial a local operator for assistance. 176 Access lines, resale only.
2nd Century Communications, Inc. 7702 Woodland Center Boulevard, Suite 50 Tampa, FL 33614	Called and got a recorded message that the Company was bankrupt. Called back and got an out of service message. No currently effective tariffs of Annual Reports.
AccuTel of Texas, Inc. 7900 John W. Carpenter Freeway Dallas, TX 75247	Prepaid, Called the Company but reached company called For A Phone. 642 Res and NO Bus lines as of 2003 Annual Report.
Adelphia Business Solutions Operations, Inc. 121 Champion Way Canonsburg, PA 15317	Business Only. No Currently effective Tariffs or Annual Reports.
Allegiance Telecom o f Missouri 1950 Stemmons Freeway, Suite 3026 Dallas, TX 75207-3118	Business Only. Still Business Only.
ALLTEL Communications, Inc. One ALLIED Drive P.O. Box 2177 Little Rock, AR 72203	Found No Annual Report For 2000. 2003 Annual report indicates no Access lines.
American Communication Services of Kansas City, Inc. 131 National Business Parkway, Suite 100 Annapolis Junction, MD 20701	No Basic Local Res. No currently effective tariffs or Annual reports.
AT&T Communications o f the Southwest, Inc. 101 West McCarty, Suite 216 Jefferson City, MO 65101	Not seeking Residential in Missouri
BarTel Communications, Inc. 333 Leffingwell, Suite 101 St. Louis, MO 63122	Prepaid, Ceased doing business 12/31/2002.
Birch Telecom o f Missouri, Inc. 2020 Baltimore Avenue Kansas City, MO 64108	2003 Annual Report shows, ** _____ _____ _____
BroadSpan Communications, Inc. see Mpower Communications Central Corp.	Bus & Res No Currently effective tariffs or Annual reports.
Brooks Fiber Communications of Missouri, Inc. 701 Brazos, Suite 600 Austin, TX 78701	2003 Annual Report, Business Only.
BTI (Business Telecom, Inc.) 4300 Six Forks Road, Suite 500 Raleigh, North Carolina 27609	As of 12/31/03, 0 access lines.
Business Telecom, Inc. See BTI	Repeated Company (affiliate provides service under different name). As of 12/31/03, 0 access

Updates To CLEC Review Conducted In TO-2001-467

	lines.
Buy-Tel Communications, Inc. 6409 Colleyville Boulevard Colleyville, TX 76034	Prepaid, 24 Access lines in 2003. Res – Resale.
Camarato Distributing, Inc. 900 Camarato Drive Herrin, Illinois 62948	Prepaid, Called reached company named New Phone. 2003 Annual Report 43 access lines.
CCCMO, Inc. see Connect!	From Annual Reports for 2002 and 2003, 0 access lines.
Central Missouri Telecommunications, Inc. P.O. Box 596 Osage Beach, Missouri 65065	Found No 2000 Annual Report. Business only, 505 access lines.
Choctaw Communications, L.C. See Smoke Signal Communications	No CLEC access lines or currently effective tariffs.
Ciera Network Systems, Inc. 2630 Fountainview, Suite 300 Houston, Texas 77057	No annual report for 2003. 2002 Annual Report shows revenues of \$0 in Missouri.
Comm South Companies, Inc. See Missouri Comm South, Inc.	Prepaid, Called twice enjoyed elevator music for about 5 minutes then disconnected each time, Called Back NO Bus. 2003 Annual Report shows no access lines.
Computer Business Sciences, Inc. See IG2, Inc.	Repeated Company (affiliate provides service under different name). Tariff cancelled 3/14/2004.
Connect! (CCCMO, Inc.) 124 West Capitol, Suite 250 Little Rock, AR 72201	Repeated Company (affiliate provides service under different name). From Annual Reports for 2002 and 2003, 0 access lines.
The Cube (Tin Can Communications Company, L.L.C.) 1063 Wirt Road, Suite 202 Houston, TX 77005	Prepaid, Found No 2000 Annual Report. No Annual Reports for 2002 and 2003.
Delta Phones, Inc. P.O. Box 784 245 Illinois St. Delhi, LA 71232	Prepaid, Found No 2000 Annual Report. For 2002, 2,484 access lines in SBC Territory. Number is out of service.
DMJ Communications, Inc. 2525 North Grandview, Suite 900 Odessa, TX 79761	Prepaid, Reports No MO Net Income or lines for 2000. No currently effective tariffs or Annual Report.
Dobson Wireless, Inc. See Logix Communications Corporation	Repeated Company (affiliate provides service under different name). Business Only, 2003 Annual Report.
dPi-Teleconnect, L.L.C. 2997 LBJ Freeway, Suite 225 Dallas, TX 75234	Prepaid. 2003 Annual Report, 81 Access lines in SBC, Resale only.
ERNEST Communications 5275 Triangle Pkwy, Suite, 150 Norcross, GA 30092	Business Only – 480 UNE P
Everest Connections Corporation 425 Woods Mill Road South Town & Country, MO 63017	Found No 2000 Annual Report. Called the Company No MO Service available currently. For 2003, 1,539 access lines. Only in KC.

Updates To CLEC Review Conducted In TO-2001-467

ExOp o f Missouri, Inc. P.O. Box 891 303 North Jefferson Kearney, MO 64060	Sprint Only, No currently effective tariff or Annual Report.
EZ Talk Communications, L.L.C. 4727 South Main Stafford, TX 74777	Prepaid, Found No 2000 Annual Report. No Annual Report for 2003.
Fast Connections, Inc. See 1-800-Reconex, Inc.	Repeated Company (affiliate provides service under different name).
Feist Long Distance Service, Inc. See Ionex Communications, Inc.	Repeated Company (affiliate provides service under different name).
Fidelity Communications Services I, Inc. 64 North Clark Street Sullivan, MO 63080	Sprint service area only. Still no SBC lines.
Fidelity Communications Services II, Inc. 64 North Clark Street Sullivan, MO 63080	Verizon service area only. Still no SBC lines.
Frontier Local Services, Inc. See Global Crossing Local Services, Inc.	Repeated Company (affiliate provides service under different name).
Frontier Telemanagement, Inc. See Global Crossing Telemanagement, Inc.	Repeated Company (affiliate provides service under different name).
Gabriel Communications of Missouri, Inc. See NuVox Communications of Missouri, Inc.	Repeated Company (affiliate provides service under different name).
GE Capital Communication Services See GE Exchange	Certificate cancelled. Still no tariff.
Global Crossing Local Services, Inc. (Formerly Frontier Local Services, Inc.) 2710 Executive Drive Green Bay, WI 54307	Business Only. 2003 Annual Report, 676 Business Access lines.
Global Crossing Telemanagement, Inc. (Formerly Frontier Local Services, Inc.) 2710 Executive Drive Green Bay, WI 54307	Business Only. 2003 Annual Report, Business Only - 930 Resale, 185 UNE - P.
Green Hills Telecommunications Services P.O. Box 227 7926 NE State Route M Breckenridge, MO 64625	Sprint service area only. Still no SBC lines.
HJN Telecom, Inc. 3235 Satellite Blvd. Building 400, Suite 300 Duluth, GA 30096	Found no 2000 Annual Report. Sold to Reliant, as of 11/14/2002. As of 5/17/2004, no access lines or revenues.
IG2, Inc. (Formerly Computer Business Sciences, Inc.) 80-02 Kew Gardens Road, Suite 5000 Kew Gardens, NY 11415	Tariff cancelled 3/14/2004.
Intermedia Communications, Inc. 3625 Queen Palm Drive Tampa, FL 33619	Business Only, FB in a number of exchanges. 2003 Annual Report does not report access lines.
Ionex Communications, Inc. 5710 LBJ Freeway, Suite 215 Dallas, TX 75240	Mainly Business, ** _____ **access lines.
KMC Telecom III, Inc. 3075 Breckinridge Blvd., Suite 415 Duluth, GA 30096	2003 Annual Report, ** _____ **

Updates To CLEC Review Conducted In TO-2001-467

LDD, Inc. 24 South Minnesota Cape Girardeau, Missouri 63702	No currently effective tariffs or Annual Reports.
Level 3 Communications, LLC 1450 Infinite Drive Louisville, CO 80027	Business Only.
Local Line America, Inc. P.O. Box 4656 Akron, OH 44310	Sprint, Spectra and Verizon service areas, Called reached company name EZ Phone. 2003 Annual Report – 52 Resold lines, Residential only.
Logix Communications Corporation (Formerly Dobson Wireless, Inc.) Now called Western Communications. 14101 Wireless Way Oklahoma City, OK 73134	Business Only, 2003 Annual Report.
Mark Twain Communications Co. P.O. Box 128 Hurdland, MO 63547	CenturyTel service area. Still no SBC exchanges.
Maxcom, Inc. 10647 Widmer Road Lenexa, KS 66215	Bus Only, KC and Springfield. No currently effective tariff or Annual Report. Called number given is 1-900-622-8000, assumed toll.
Max-Tel Communications, Inc. P.O. Box 280 102 W. Franklin Alvord, TX 76225	No Annual Report. Given information for Maxcom.
MCImetro Access Transmission Services, LLC 701 Brazos, Suite 600 Austin, TX 78701	No lines reported for 2000, may be included in WorldCom. Called and reached WorldCom. 2003 Annual Report, Mainly St. Louis, KC, and Springfield.
MCI Worldcom Communications, Inc. (Worldcom, Inc.) 701 Brazos, Suite 600 Austin, TX 78701	Bus Only, St. Louis, KC and Springfield. No currently effective tariffs or Annual Reports.
McLeodUSA Telecommunications Services, Inc. P. O. Box 3177 Cedar Rapids, IA 52406	. In 2003, ** _____ **
MGC Communications, Inc. See Mpower Communications Corp.	Repeated Company (affiliate provides service under different name).
Missouri Comm South, Inc. (Comm South Companies, Inc.) P.O. Box 821269 2909 Buckner Blvd., Suite 800 Dallas, TX 75228	Repeated Company (affiliate provides service under different name). 2003 Annual Report shows no access lines.
Missouri State Discount Telephone 804 Elkins Lake Huntsville, TX 77340	Prepaid 2003 Annual Report 28 SBC Resold Residential Lines.
Missouri Telecom, Inc. P.O. Box 419 515 Cleveland, Suite C Monett, MO 65708	2003 Annual Report, ** _____ **
MLM Telecommunications d/b/a Ameritel, Your Phone Company 1307 Central Avenue Hot Springs, Arkansas 71901	2002 Annual Report 89 UNE P Residential But No 2003 Annual Report

Updates To CLEC Review Conducted In TO-2001-467

Mpower Communications Central Corp. (Formerly Broadspan Communications, Inc.)	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
Mpower Communications Corp. (Formerly Mpower Communications Central Corp.) (Formerly Broadspan Communications, Inc.) (Formerly MGC Communi	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
Navigator Telecommunications, L.L.C. P.O. Box 13860 8525 Riverwood Park Drive North Little Rock, AR 72113-0860	2003 Annual Report - 1,634 Residential lines and 543 Business lines.
Net-Tel Corporation See Net-Tel Communications Corporation	Certificate cancelled. Still no Annual Report.
Nextlink Missouri, Inc. See XO Missouri, Inc.	Repeated Company (affiliate provides service under different name).
NOW Communications, Inc. 713 Country Place Drive Jackson, MS 39208	Prepaid, Found No 2000 Annual Report for 2000. No Annual Report for 2003.
NuVox Communications of Missouri, Inc. Formerly Gabriel Communications of Missouri, Inc 16090 Swingley Ridge Road Chesterfield, MO 63017	Business Only – 2003 Annual Report – Approx. 33,000 access lines.
Omniplex Communications Group, LLC (Formerly USA eXchange, LLC) 17 Research Park Drive St. Charles, MO 63304	Resale Only. Purchased by CIERA.
The Pager Company D/b/a The Pager and Phone Company 3030 East Truman Road Kansas City, MO 64127	No Bus lines in Annual Report, DR Response was consistent. 2003 Annual Report, 1,202 resold access lines, 6,911 UNE P lines. Residential only. Mainly in KC area.
Payroll Advance 808 South Baker Mountain Home, AR 72643	Reports 207 Res NO Bus in Annual Report. DR response consistent. 2003 Annual Report, 213 resold residential lines. No tariff according to EFIS.
Phones for All (Teléfonos Para Todos) (Preferred Carrier Services, Inc.) 14681 Midway Road, Suite 105 Dallas, Texas 75244	Called NO Bus. No currently effective tariffs or Annual Report
Preferred Carrier Services, Inc. see Phones for All	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Report
Primary Network Communications (BroadSpan Communications, Inc.) See Mpower Communications Central Corp.	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
QCC, Inc. now called Cinergy (Formerly Quest Communications Corporation) 8829 Bond Street Overland Park, KS 66214	Prepaid, Found No 2000 Annual Report. 2003 Annual Report, no access lines. Not accepting new Missouri customers.

Updates To CLEC Review Conducted In TO-2001-467

Quick-Tel Communications, Inc. P.O. Box 196 456 W Rock Island Boyd, Texas 76023	Prepaid, Found No 2000 Annual Report. 2003 Annual Report, no revenues or access lines in Missouri.
Quintelco, Inc. 1 Blue Hill Plaza Pearl River, NY 10965	2000 Annual Report No Net Income, 0 lines. No currently effective tariffs or Annual Reports.
Qwest Communications Corporation (USLD Communications, Inc.) 4250 N. Fairfax Drive, 12W002 Arlington, VA 22203	2003 Annual Report, no access lines or revenues in Missouri.
Reconex See 1-800-Reconex	Repeated Company (affiliate provides service under different name).
Reitz Rentals, Inc. See SouthWest TeleConnect	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
Ren-Tel Communications, Inc. 7337 S. Mitchell Ct. Villa Rica, GA 30180	Prepaid, Found No 2000 Annual Report. 2003 Annual Report, 372 UNE P residential lines.
Sage Telecom 805 Central Expressway South, Suite 100 Allen, TX 75013	Business and Residential
Simply Local Services, Inc. 2225 Apollo Dr. Fenton, MO 63026	Prepaid. Found No 2000 Annual Report. Called received message that number is not in service or not from my area code (660). No currently effective tariffs or Annual Reports.
Smoke Signal Communications (Choctaw Communications, L.C.) 8400 South Gessner Houston, Texas 77074	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
Snappy Phone of Texas, Inc. See Snappy Phone	GTE service area only. Reached company named Budget Phones. No 2003 Annual Report.
Snappy Phone (Snappy Phone of Texas, Inc.) P.O. Box 29620 6901 West 70th Street Shreveport, LA 71149	GTE service area only. No 2003 Annual Report.
Socket Telecom 1005 Cherry Street, Suite 104 Columbia, MO 65201	Business Only
SouthWest TeleConnect Now called MetroConnect. 7000 Cameron Road, Suite 200 Austin, TX 78752-2828	Prepaid. No currently effective tariffs or Annual Reports.
Sprint Communications Company, L.P. 5454 West 110th Street Overland Park, KS 66211	2003 Annual Report, 5,526 UNE P Residential and 750 UNE P Business.
Sterling International Funding, Inc. see Reconex	Found No 2000 Annual Report. No 2003 Annual Report.
Suretel, Inc. 5 North McCormick Oklahoma City, OK 73127	Prepaid, No 2003 Annual Report.

Updates To CLEC Review Conducted In TO-2001-467

TCG Kansas City, Inc. Teleport Communications Group Two Teleport Drive Staten Island, NY 10311	Metro KC Business Only - KC
TCG St. Louis Two Teleport Drive, Suite 300 Staten Island, NY 10311	Metro St. Louis Business Only St. Louis
Tel Com Plus (United States Telecommunications, Inc.) 5251 110th Avenue, North, Suite 118 Clearwater, FL 33760-4837	Prepaid. Found No 2000 Annual Report. No currently effective tariffs or Annual Reports.
Teléfonos Para Todos (Preferred Carrier Services, Inc.) see Phones for All	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Report
Teligent Services, Inc. 8065 Leesburg Pike, Suite 400 Vienna, VA 22182	Certificate cancelled. 2003 Annual Report, no Missouri access lines.
Tel-Link, L.L.C. 1001 Third Avenue West, Suite 354 Bradenton, FL 34205	Prepaid. Found No 2000 Annual Report. No currently effective tariffs or Annual Reports.
Tin Can Communications Company, L.L.C. See Cube, The	Repeated Company (affiliate provides service under different name). No Annual Reports for 2002 and 2003.
TranStar Communications P.O. Box 211807 Bedford, TX 76095	Prepaid. Found No 2000 Annual Report. Called and reached NOW Communications, NO Bus. No currently effective tariffs or Annual Reports.
United States Telecommunications, Inc. See Tel Com Plus	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
Universal Telecom, Inc. 105 East Adams Street Building II, Suite 200 LaGrange, KY 40031	Prepaid, Sprint, Verizon and CenturyTel service areas, 2000 Report indicates no customers or lines, I am served by CenturyTel but the calls could not be completed as entered. 2003 Annual Report, 1,013 Statewide Resold residential lines.
Universal Telephone 2405 E. Pawnee, Suite 10 Wichita, KS 67211-5455	Prepaid. Found No 2000 Annual Report. No currently effective tariffs or Annual Reports. Phone number disconnected.
USA eXchange, LLC See Omniplex Communications Group	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
USLD Communications, Inc. See Qwest Communications Corporation	Repeated Company (affiliate provides service under different name). No access lines, 2003 Annual Report (Qwest)
U.S. Telco, Inc. 4001 McEwen, Suite 200 Dallas, TX 75244	Prepaid. Found No 2000 Annual Report. No currently effective tariffs or Annual Reports.
Winstar Wireless, Inc. Now called Winstar Communications 1615 L Street, NW, Suite 1260 Washington DC 20036	Bus Only, KC and St. Louis.. 2003 Annual Report, 2,507 Resale lines, business only.

Updates To CLEC Review Conducted In TO-2001-467

WorkNet Communications Inc. 7777 Bonhomme Avenue, Suite 2000 St. Louis, MO 63105	Bus Only. Found No 2000 Annual Report. No currently effective tariffs or Annual Reports.
Worldcom, Inc. See MCI Worldcom Communications, Inc.	Repeated Company (affiliate provides service under different name). No currently effective tariffs or Annual Reports.
XO Missouri, Inc. (f/k/a Nextlink Missouri, Inc.) 2020 Westport Center Drive Maryland Heights, MO 63146	Found No 2000 Annual Report. Business Only, St. Louis.
Z-Tel Communications, Inc. 601 South Harbour Island Blvd., Suite 220 Tampa, FL 33602	990 access lines in SBC.

Others

Bullseye \$70 per month recurring charge according to tariff.

Big River called, basic local, no services, \$21.00.

MyLine is Excel Called, Not accepting new customers.

One Choice is Vartec Called, Not accepting new customers.

877 RingAgain Prepaid.

Talk.com is Talk America, \$52.95 per month.

Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Residential Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Residential w/o PP	Estimated E911 Residential	Estimated CLEC At Least Partially Facilities Based Residential w/o PP	Estimated Res HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
1	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
2	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
3	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
4	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
5	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
6	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
7	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
8	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
9	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
10	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
11	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
12	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
13	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
14	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
15	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
16	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
17	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
18	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
19	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
20	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
21	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
22	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
23	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
24	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
25	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
26	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
27	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
28	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
29	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
30	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
31	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
32	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
33	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
34	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
35	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
36	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
37	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
38	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
39	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
40	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
41	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
42	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
43	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
44	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
45	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
46	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA

Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Residential Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Residential w/o PP	Estimated E911 Residential	Estimated CLEC At Least Partially Facilities Based Residential w/o PP	Estimated Res HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
47	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
48	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
49	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
50	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
51	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
52	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
53	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
54	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
55	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
56	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
57	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
58	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
59	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
60	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
61	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
62	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
63	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
64	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
65	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
66	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
67	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
68	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
69	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
70	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
71	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
72	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
73	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
74	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
75	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
76	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
77	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
78	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
79	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
80	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
81	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
82	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
83	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
84	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
85	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
86	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
87	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
88	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
89	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
90	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
91	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA
92	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA	AA

Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Residential Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Residential w/o PP	Estimated E911 Residential	Estimated CLEC At Least Partially Facilities Based Residential w/o PP	Estimated Res HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED; SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
93	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
94	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
95	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
96	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
97	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
98	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
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100	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
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102	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
103	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
104	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
105	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
106	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
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111	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
112	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
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121	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
122	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
123	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
124	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
125	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
126	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
127	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
128	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
129	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
130	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
131	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
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133	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
134	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
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136	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
137	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA
138	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA	AA AA

Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Residential Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Residential w/o PP	Estimated E911 Residential	Estimated CLEC At Least Partially Facilities Based Residential w/o PP	Estimated Res HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Res HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
139	** **	** **	** **	** **	** **	** **	** **	** **	** **	** **	** **
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Total:				** **	** **	** **	** **	** **	** **	** **	** **

Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Business Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Business w/o PP	Estimated E911 Business	Estimated CLEC At Least Partially Facilities Based Business w/o PP	Estimated Bus HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
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Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Business Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Business w/o PP	Estimated E911 Business	Estimated CLEC At Least Partially Facilities Based Business w/o PP	Estimated Bus HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
47	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
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49	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
50	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
51	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
52	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
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55	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
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57	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
58	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
59	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
60	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
61	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
62	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
63	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
64	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
65	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
66	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
67	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
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69	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
70	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
71	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
72	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
73	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
74	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
75	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
76	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
77	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
78	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
79	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
80	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
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83	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
84	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
85	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
86	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
87	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
88	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
89	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
90	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
91	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00
92	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00	00 00

Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Business Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Business w/o PP	Estimated E911 Business	Estimated CLEC At Least Partially Facilities Based Business w/o PP	Estimated Bus HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
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Line	Exchange	Exchange Size Rank	Rate Group	Total Estimated CLEC Business Lines w/o PP	Estimated Resold Residential w/o PP	Estimated UNE P Business w/o PP	Estimated E9 11 Business	Estimated CLEC At Least Partially Facilities Based Business w/o PP	Estimated Bus HHI Floor All Methods Of CLEC Entry except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "At Least Partially Facilities Based" except PP (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)	Estimated Bus HHI Floor "Pure Facilities Based" (SUM SWBT LINES SQUARED, SWBT = 100% - CLEC %)
				Combined CLEC Lines Measured As A Percentage Of Total Missouri Lines							
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Total:				** **	** **	** **	** **	** **	** **	** **	** **

Busch, James

From: michelle.schwartz@psc.mo.gov
Sent: Thursday, December 16, 2004 9:52 AM
To: jim.busch@ded.mo.gov
Subject: RE: CLECs

Sure. Hope this is what you need.

Z-Tel - PSC MO #2, effective March 15, 2001
Z-Tel - PSC MO #3, effective March 15, 2001
Tel-Link - PSC MO #1 Cancelled
Quintelco - PSC MO #1 & #2 Cancelled October 6, 2002
Net-Tel - (d/b/a Tel 3) - assets transferred to One Star Long Distance, March 20, 2000
Midwestern Tel - PSC MO #1 & #2 Cancelled May 6, 2004
LDD - Cancelled May 13, 2002
IG2 - Cancelled March 14, 2004
HGN Telecom - Sale of Stock and Name Change to Reliant Communications, December 15, 2002
CenturyTel of Missouri - Only ILEC tariffs on file.

We do have the cancelled tariffs electronically, so if you ever need to check any other, please don't hesitate to let me know. If there is anything else I can do for you, please feel free to ask! Have happy holidays!!!

Michelle

-----Original Message-----

From: Busch, James [<mailto:jim.busch@ded.mo.gov>]
Sent: Thursday, December 16, 2004 9:34 AM
To: Schwartz, Michelle
Subject: CLECs

Here is the list. If you can find them, could you give me the date of certification, or an effective tariff date? Thankyouverymuch.

Z-Tel
Tel-Link
Quintelco
Net-Tel
Midwestern Tel
LDD
IG2
HJN Telecom
CenturyTel of Missouri Residential

Schedule BAM-5