

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

In the Matter of AT&T Communications of the )  
Southwest, Inc.'s Petition for Second Compulsory )  
Arbitration Pursuant to Section 252(b) of the )  
Telecommunications Act of 1996 to Establish an ) Case No. TO-98-115  
Interconnection Agreement with Southwestern Bell )  
Telephone Company. )

**AFFIDAVIT OF MERRI LYNN OWENS**

I, Merri Lynn Owens, of lawful age, being duly sworn, depose and state:

1. My name is Merri Lynn Owens. I am presently Manager-Recent Change Memory Administration Center (RCMAC) Methods and Procedures for Southwestern Bell Telephone Company ("SWBT"). My business address is 530 McCullough, Room 3-LL-03, San Antonio, Texas.

2. My primary responsibility is technical support to the RCMAC field supervisors on issues relating to the functions of an RCMAC group. I develop Methods and Procedures for new service or feature offerings. I develop time estimates, as requested by the Cost Study organization, for new or existing services or features.

3. I began my career with Ohio Bell Telephone Company in 1970 as a long distance operator. I moved on to clerical jobs in Network Administration doing Line and Number assigning, data collection and posting and switch translations. I moved to an Engineering Group in 1978 where I continued doing switch translations. In 1980, I transferred to Southwestern Bell Telephone Company in San Antonio, Texas, as a Senior Reports Clerk with Network Design doing data posting and analysis. I moved to Piscataway, New Jersey in 1985 and worked at Bellcore in several capacities, one as a clerical assistant in the Regulatory group and later as Manager in the TNDs group working as PC/LAN administrator. I returned to Southwestern Bell Telephone in 1987 as a Manager-Translations, in Dallas, Texas. March, 1992, I moved to Austin as Manager-RCMAC, Network Operations. In July, 1993, I moved to the SCC as Manager-Network Maintenance; later moving to a central office environment with the same title. I

Exhibit No. 10  
Date 9-4-98 Case No. TO-98-115  
Reporter KE

moved to San Antonio in my current position in July, 1998. I understand that the Arbitration Advisory Staff filed a Costing and Pricing Report, Volume 2 on July 24, 1998. The Report recommends cutting Southwestern Bell's nonrecurring rates in half based upon the AAS opinion that Southwestern Bell does not have sufficient evidence to demonstrate the labor required to perform nonrecurring activities. The purpose of my affidavit is to substantiate the time estimates used in the cost studies by explaining the process used to develop the time estimates used in the cost studies.

4. At the request of the Cost Studies Organization, the RCMAC work groups provided input for cost studies relating to the time and activities for UNE provisioning. These work groups developed the time estimate packages for the translation activity for UNE provisioning using the DMS-100 and 5ESS switch technologies which are the primary switch technologies utilized in SWBT's network.

5. The time estimates were based upon SME experience in supervising local personnel in the RCMAC and many hours observing translations activity. The Line Translations Specialists, who provided input had an average time in title in the RCMAC of 15 years.

6. The time estimates were developed on an average skill level of the employee performing the task. The work force of the RCMAC is comprised of employees with varying levels of experience and time on the job. The time estimates reflect an average work time for the mix of expertise.

7. The time estimates provided are for the Line Translations Specialists (LTS) within the RCMAC. Line Translation Specialists monitor the flow-through of service orders. If an order falls out or rejects, the LTS types the order manually into the MARCH database via keyboard inputs.

8. Southwestern Bell uses the MARCH database to create and input translations into the switches. UNE orders use this same operational system. If an order fails to process through MARCH, an LTS manually edits or types the order so that it will process through the switch.

9. The time estimates reflect the MARCH mechanized system process.

10. I am confident that the work provided is accurate and reflects the true time required to do translations work based on experience in the RCMAC as both a Supervisor and Staff Support Manager.

11. I have reviewed the national average times that AT&T provided in the AT&T Non-Recurring Cost model. Based upon my experience, I conclude that those do not reflect expected activity in Missouri or elsewhere in the SWBT operating areas. The time estimates that were provided by the Southwestern Bell managers are reflective of the true times.

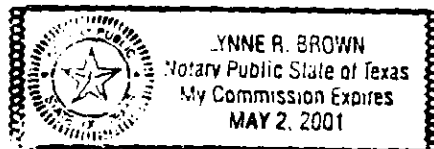
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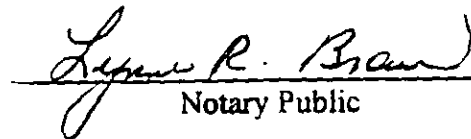


Merri Lynn Owens

STATE OF TEXAS       )  
                                  )SS  
CITY OF SAN ANTONIO )

Subscribed and sworn to before me this 20<sup>th</sup> day of August, 1998.



  
Notary Public