

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)
Arbitration pursuant to Section 252(b))
of the Telecommunications Act of 1996) Case No. TO-98-115
to Establish an Interconnection Agreement)
with Southwestern Bell Telephone Company)

AFFIDAVIT OF MIKE MICHALCZYK

I, Mike Michalczyk, of lawful age, being duly sworn, depose and state:

1. My name is Mike Michalczyk, I am Area Manager-Network I/M Operations for Southwestern Bell Telephone Company (SWBT). My business address is 530 McCullough, Room 3-P-10, San Antonio, Texas 78215.

2. My responsibilities include network operations support of designed and non-designed installation and maintenance (I/M) services and cable repair. I provide support to field operations through clarification, modification and training of existing methods and procedures.

3. I also have new products, services and technologies development responsibilities. I participate on product teams, identifying network I/M operational needs (requirements, OSS integration, functionality, costs, objectives, time frames, etc.), provide data required for business case creation, and negotiate with outside vendors for network compatible equipment. I prepare operational test plans, assist with testing in lab and field environments, identify network operational flows, prepare operational procedures for I/M forces and assist field I/M forces with implementation of new products and services.

Exhibit No. 8
Date 9-4-98 Case No. TO 98-115
Reporter XF

4. I have been an employee of Southwestern Bell Telephone Company since 1971. I began as a network I/M workcenter stockman while attending the University of Oklahoma, and upon receiving my degree in 1972, was promoted into management. I have a broad background in network operations, with multi-level management experience in both line and staff positions. My experience includes management of forces responsible for designed and non-designed I/M, cable repair, maintenance center operations, provisioning, designed and non-designed outside plant engineering, pair gain and loop electronics, fiber optics, high capacity services, data, PBX, key systems, and CPE. In my current position, I have been successful in the development and integration of new technologies within SWBT.

5. Throughout my career, I have attended technical and administrative training courses to maintain my knowledge of leading edge technology. I am considered a Subject Matter Expert, SME, for network operations. I strive to maintain my expertise through continued training, development and close interaction with field technical forces. Participation on new product and services teams continues to improve my knowledge of, and ability to support reliable, effective and efficient technologies used within Southwestern Bell Telephone Company.

6. I/M stands for installation and maintenance; it includes the activities such as receipt and analysis of service order and repair work requests, operation of vehicles used in the performance of work functions, cross connect terminations at copper and fiber optic interfaces and terminals, placement of electronic circuit cards at remote interfaces, terminals and customer premises, network interface devices, network terminating equipment, electronic multiplexing equipment, CPE, inside wire and connecting blocks, and terminal equipment. I/M technicians perform circuit and equipment turn-up and acceptance testing and analyze, isolate and repair

trouble reports (with appropriate test equipment). I/M technicians interface with network operating systems and test access points with technician access devices and test equipment, communicate with support center personnel, and perform end to end testing with customers or their agents when appropriate. I/M technicians perform administrative functions with service order and repair activity to ensure customer records are understood and requested service is completed correctly. I/M technicians attend technical training courses and receive refresher on the job training to maintain their knowledge of SWBT's network and technology changes.

7. I am responding to issues concerning the I/M activities accounted for in nonrecurring cost studies associated with loop and NID.

8. I assisted the Cost Study group by organizing the development of the data request packages used in Missouri to develop nonrecurring cost studies for Special Access Services, as well as UNEs underlying these types of services, such as metallic 8dB loops, DS1, etc. The facility types covered range from simple metallic services to optical service. Each service type was separated into logical sub-tasks, with each task defined by beginning function, work activity and ending function. The data requested for each sub-task included the level of the person who normally performs the activity and an estimate of time to perform the activity. I prepared these definitions, along with the assistance of two other managers also skilled in this area, to delineate the precise activities that would accompany each element. There are similar "sub-tasks" for each element under study, (e.g., metallic 8dB loop, DS1, etc.).

9. The Cost Study group requested my (Mike Michalczyk) assistance in verifying, or revising previously collected time estimates for a nonrecurring UNE cost study. The data request was formatted using an Excel Spreadsheet and I distributed a copy of the request to technical staff managers responsible for network I/M services in each SWBT market areas. Along with the

"sub-task" descriptions which served as the basis for the exercise, these managers, all of whom are known to me and have performed similar tasks at my direction for other services, forwarded the data request forms to supervisors directly responsible for the I/M activities associated with the services types requested. The completed data forms were returned to the staff managers who reviewed them, checking for reasonable and complete data. The forms were then forwarded to me, and I also checked for reasonable and complete data. If the data was found to be unreasonable or incomplete, by the staff manager or myself, the supervisor that recorded the data was contacted. After reviewing the sub-task definition, the data was verified correct, or modified as appropriate.

10. The staff managers that received the data request each had over twenty years of experience with Southwestern Bell Telephone within network operations. Their backgrounds covered many areas of network operations, but all having experience with designed network operations. The supervisors that completed the data requests all had direct responsibility for the types of services being studied. Their experience in network operations averaged over fifteen years of service.

11. Cost study personnel requested time estimates for specific UNE facility types and services, specifically those on the "sub-task lists." The data necessary for the study was formatted as described above, and forwarded to me, Mike Michalczyk, with a request to have the field technical forces with the appropriate base knowledge, complete and return the provided data forms.

12. The time estimates were developed to be reflective of an "average skill level" of the technicians (group 1 craft) who will do the work. The work force in Southwestern Bell is

made up of employees with varying levels of experience and time on the job. Time estimates should be reflective of that variance and are targeted for an average work time.

13. Based on my work experience and management of technical forces, I feel confident that the work I provided is accurate and reflects the time required to perform the functions studied.

Further, affiant sayeth not.

Mike Michalczyk ✓

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

Subscribed and sworn to before me this 11 day of August, 1998.

Notary Public

NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS
 MY COMMISSION EXPIRES ON 07-23-2021