

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) Case No. TO-98-115
Act of 1996 to establish an Interconnection)
Agreement with Southwestern Bell Telephone)
Company)

AFFIDAVIT OF BARRY A. MOORE

I, Barry A. Moore, of lawful age, being duly sworn, depose and state:

1. My name is Barry A. Moore. I am presently Area Manager-Product Cost Development and Analysis for SBC Telecommunications, Inc. My qualifications and work history are included in (Moore) Schedule 1, attached to this affidavit.

COMMENTS REGARDING AAS COST RECOMMENDATIONS

2. The AAS Costing and Pricing Report, Volume 2, indicates that "...Staff requested SWBT rerun its cost studies with Staff's recommendations." Although Staff did request that several studies be examined to determine the impact of its recommendations, Staff did not make a formal request regarding the rerun of SWBT cost studies. Staff agreed with SWBT that rerunning cost studies would not be appropriate until after the Commission had issued its decision. SWBT did provide Staff with an informal cost estimate incorporating Staff's recommendations for the following cost studies:

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

Cross-connects

- 4-Wire DS1 Loop Cross-connect to Multiplexer

UNE Dedicated Transport

- Entrance Facilities
- DS1 Cross-connect
- Digital Cross-connect System
- Multiplexing

Dark Fiber

- Dark Fiber Cross-connect

3. In response to the costing recommendations proposed by Staff in this proceeding, I have examined those areas specific to Cross-connects, Unbundled Dedicated Transport, and Dark Fiber. I will comment on those specific recommendations, excluding any discussions on Staff's proposed "global modifications"¹ relating to cost factors and common costs.

4. Staff recommends only that "global modifications" be made to DCS and Switch Port Cross-Connects, 4-Wire DS1 Loop Cross-connect to Multiplexer, and CLEC to SS7 STP Cross-Connects. Staff's "global modifications" include, as stated, "any other applicable modifications Staff recommended in TO-97-40/67 that apply to the cost studies in dispute in this arbitration." SWBT does not believe it is appropriate to make modifications to these studies without determining whether the modifications are appropriate. The Commission has not made any determination that modifications

¹ By "global modifications", SWBT understands that Staff proposed to make designated changes to all of SWBT's cost studies. Some of those designated changes were previously recommended by Staff in TO-97-40, et al.

proposed by Staff are to be made automatically to these cost studies. It is SWBT's position that the global revisions are not appropriate for the DCS, Switch Port, 4-Wire DS1 Loop to Multiplexer, and SS7 cross-connects.

5. The estimations to the cross-connect studies based upon earlier Staff recommendations made in May and referenced in number 2 above are no longer valid because Staff's previous recommendations differ from those now supported by Staff.

Staff's May recommendations sought to extend the TO-97-40/67 Staff recommendations to these cross-connects. That proposal would require the development of cross-connect costs on a with and without testing basis. The proposal would have applied to all cross-connects filed in this proceeding, and would have effected a change in the 4-Wire DS1 Loop Cross-Connect to Multiplexer; other elements would have been affected but only due to cost factor modifications. In the second round of arbitration SWBT objected to the development of cross-connect prices without testing capabilities. As Mr. Hearst has indicated in his affidavit, SWBT must provide for the testing of unbundled elements in order to maintain the same quality of service for wholesale (UNE) customers as it provides to its own customers. SWBT will require testing equipment on its facilities and the exclusion of such equipment will result in prices for such elements that are not compensatory. In addition, during the second round, SWBT agreed with Staff that the Intermediate Distribution Frame (IDF) to Multiplexer issues had been brought to closure in the earlier, first round.

6. Staff concludes that "there are costs for entrance facilities." It also concludes that "Cost studies for entrance facilities were included in the Dedicated


transport cost studies SWBT submitted." SWBT agrees and has conducted cost studies consistent with these conclusions.

7. Staff recommends that earlier LPVST model (SWBT's loop investment model platform) modifications also be made to DS1 and DS3 UNE Entrance Facility costs. Such modifications will include the development of samples specific to DS1 and DS3 (or DS1 as a surrogate for DS3), and the use of average lengths in individual distance bands in lieu of the use of the distance band designation. SWBT agrees with these recommendations.

8. Regarding OC-X entrance facilities, Staff recommends pricing these elements on an ICB basis. SWBT agrees with Staff on this issue and offers no further comments.


9. Staff recommends that SWBT alter its dedicated transport cost studies with all of the global modifications described in TO-97-40/67. Staff also recommends that SWBT separate the costs associated with DCS access and with multiplexing in its costs for dedicated transport cost study (for speeds that differ from when the traffic is picked up or dropped off). SWBT agrees that the costs for DCS access and multiplexing are separate from dedicated transport and have previously provided stand alone cost studies for DCS access and multiplexing.

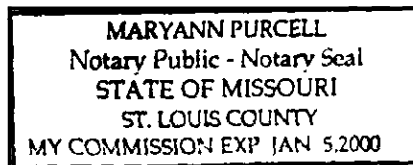
10. Regarding DCS and multiplexing, Staff also recommends that SWBT provide separate costs for these components of Dedicated Transport costs so that the CLEC could get on or off of the network at differing speeds than the transport speed being utilized. SWBT agrees with Staff on this issue and those studies currently are arranged in the manner recommended.


Barry A. Moore

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

Subscribed and sworn to before me on this 24th day of August 1998.


Notary Public



SUMMARY OF EDUCATION AND WORK EXPERIENCE OF

Educational Background

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

- A. In 1982, I received a Bachelor of Science Degree in Mechanical Engineering from the University of Missouri in Columbia, Missouri. In 1993, I received a Masters Degree in Business Administration from Lindenwood College in St. Charles, Missouri. In addition to my formal education, I have also attended a number of seminars and various courses relating to cost analysis and other related areas.

Work Experience

Q. PLEASE OUTLINE YOUR WORK EXPERIENCE WITH SOUTHWESTERN BELL TELEPHONE COMPANY.

- A. I was employed by Southwestern Bell in 1979 as an installation technician in St. Louis, MO. In 1982, I accepted the position of Construction Supervisor and was responsible for supervising the construction of telephone plant in the Metropolitan St. Louis area. In the mid-1980s, I was responsible for supervising the maintenance of telephone cables. In 1986, I accepted the position of Manager-Cost Analysis and was responsible for conducting cost studies for various retail services provided by Southwestern Bell Telephone Company. From 1988 to present, I have carried the equivalent title of Area Manager-Product Cost Development and Analysis.

I am currently responsible for the development and review of cost studies for services and elements provided and anticipated by Southwestern Bell Telephone Company. During my tenure at SWBT, I have been involved with the development of numerous cost studies involving SWBT's various network

components. Based upon both my field and cost experience, I am fully aware of the cost characteristics of SWBT's facility components.

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