

**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 LEONARD D. ELLIS**

1. My name is Leonard Ellis. My business address is 530 McCullough, San Antonio, Texas. Room 3-S-1. I am employed by Southwestern Bell Telephone Company. My title is Area Manager - TIRKS. CPC Methods.

2. I have been an employee of SWBT since 1969. During my career I have held craft titles of Frameman and Teletypeman. I was promoted to management in 1976, and held the titles of Engineering Associate, Installation and Maintenance Foreman and Testing Foreman. In 1986, I was promoted to a second level management position on the Missouri State Staff supporting all provisioning activities in the state. In 1994 I moved to company headquarters and I am currently responsible for the development of provisioning methods for all Unbundled Network Elements (UNE).

3. The time estimates that were used to determine nonrecurring costs for unbundled network elements were developed in the following manner. The Cost Studies organization requested assistance in verifying time estimates for the nonrecurring UNE cost studies. Sixteen managers who supervise the clerks that perform the provisioning functions were asked to determine accurate estimates of the time required to perform each function. The managers received descriptions of the thirteen tasks and were asked to accurately estimate the

Exhibit No. 5  
Date 8-4-98 Case No. TO-98-115  
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average time required to perform each of the functions listed. The thirteen functions were divided into two groups. Functions 1 through 4A were addressed by managers familiar with the order logging and loop input functions. Functions 5 through 12 were addressed by the managers familiar with the design function. Each group of managers discussed the specific tasks and jointly arrived at an accurate estimate for each function based on their personal on-the-job experience. The data was forwarded to the cost studies coordinator to be summarized.

4. Each of the managers that received the data requests had over fifteen years service with Southwestern Bell and over ten years experience in the Provisioning Center. Their backgrounds cover many areas of the provisioning process, all having experience with these services. All of the managers had direct responsibility for the types of services being studied.

5. The time estimates were developed to be reflective of an "average skill level" of the clerks who actually do the work. The work force in Southwestern Bell is made up of employees with varying levels of experience and time on the job. The time estimates reflect that variance and are targeted for an average work time.

6. I am confident that the time estimates are an accurate reflection of the actual time required. My confidence is based on my personal knowledge of the actual work required, and my confidence in the methods used to produce the estimates. The managers involved in determining the time estimates handle these functions daily and they are in the best position to determine the average time required to perform each task.

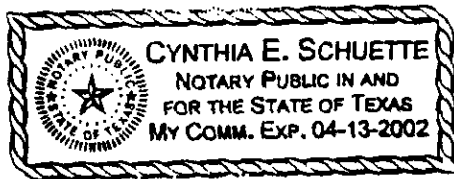
7. The position of AT&T that all of these functions can be done without any labor expended or a zero time estimate is arbitrary and unreasonable.

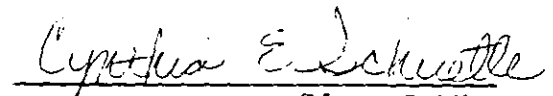
  
Leonard D. Ellis

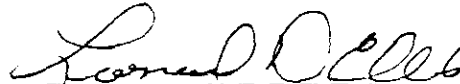
Sworn to and subscribed before me this 21<sup>st</sup> day of  
August in the year 1998.

Notary Public State of Texas  
County of Bexar

My commission expires: 4-13-2002



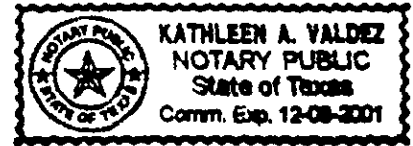
  
(Notary Public)

  
Leonard D. Ellis

Sworn to and subscribed before me this 20th day of  
August in the year 1998.

Notary Public State of Texas  
County of Bexar

My commission expires: 12-08-2001



  
Kathleen A. Valdez (Notary Public)