NANCY R. URITE General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Tallahassee, florida 32301 (404) 335-0710



December 18, 1995

Mrs. Blanca S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

> Docket No. 950985D-TP RE:

Dear Mrs. Bayo:

Enclosed please find in response to Time Warner AxS of Florida and Digital Media Partners' Petition an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Dr. Aniruddha (Andy) Banerjee and Robert C. Scheye in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (BL) AFA \_ **-**nclosures All Parties of Record A. M. Lombardo R. G. Beatty CTR \_ R. D. Lackey EAG . LEG OPC \_\_\_ RCH \_\_\_\_ **RECEIVED & FILED** SEC \_ WAS \_\_\_ **FPSC-BUREAU OF RECORDS** OTH \_\_\_\_

NUMBER-DATE 2714 DEC 188

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE Docket No. 950985A-TP Docket No. 950985B-TP Docket No. 950985C-TP Docket No. 950985D-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 18th day of December, 1995 to:

RICHARD H. BRASHEAR
ALLTELL FLORIDA, INC.
206 WHITE STREET
LIVE OAK, FL 32060
904-364-2517

F. B. POAG
CENTRAL TELEPHONE COMPANY
OF FLORIDA
555 LAKE BORDER DRIVE
APOPKA, FL 32703
407-889-6405

LAURIE A. MAFFETT
FRONTIER COMMUNICATIONS OF
THE SOUTH, INC.
180 SOUTH CLINTON AVENUE
ROCHESTER, NY 14646
716-777-5125

BEVERLY Y. MENARD
GTE FLORIDA, INC.
106 EAST COLLEGE AVENUE
SUITE 1440
TALLAHASSEE, FL 32301
813-224-4825

A. D. LANIER
GULF TELEPHONE COMPANY
115 W. DREW STREET
PERRY, FL 32347
904-584-0900

ROBERT M. POST, JR.
INDIANTOWN TELEPHONE
SYSTEM, INC.
16001 S.W. MARKET STREET
INDIANTOWN, FL 34956
407-597-3113

JOHN T. MCGLEW
N.E. FLORIDA TELEPHONE
COMPANY, INC.
130 N. 4TH STREET
MACCLENNY, FL 32063
904-259-2261

DANIEL V. GREGORY
QUINCY TELEPHONE COMPANY
107 W. FRANKLIN STREET
QUINCY, FL 32351
904-875-5214

JOHN H. VAUGHAN
ST. JOSEPH TELEPHONE AND
TELEGRAPH COMPANY
502 5TH STREET
PORT ST. JOE, FL 32456
904-229-7221

FERRIN SEAY
FLORALA TELEPHONE
COMPANY, INC.
522 N. 5TH STREET
FLORALA, AL 36442
334-858-3211

LYNN B. HALL
VISTA-UNITED
TELECOMMUNICATIONS
P.O. BOX 10180
LAKE BUENA VISTA, FL 32830
407-827-2210

JODIE DONOVAN
TCG SOUTH FLORIDA
1133 21ST STREET, NW
SUITE 400
WASHINGTON, DC 20036
202-739-0010

MICHAEL W. TYE
AT&T
101 NORTH MONROE STREET
SUITE 700
TALLAHASSEE, FL 32301
904-425-6360

ROBIN D. DUNSON, ESQ. 1200 PEACHTREE STREET, NE PROMENADE I, ROOM 4038 ATLANTA, GEORGIA 30309 810-8689

RICHARD D. MELSON
HOPPING GREEN SAM & SMITH
123 S. CALHOUN STREET
TALLAHASSEE, FL 32301
904-222-7500

PATRICK K. WIGGINS
INTERMEDIA COMMUNICATIONS OF
FLORIDA, INC.
WIGGINS & VILLACORTA
501 EAST TENNESSEE STREET, #B
TALLAHASSEE, FL 32308
904-222-1534

FLOYD SELF
MCCAW COMMUNICATIONS
MESSER, VICKERS, CAPARELLO,
MADSEN, LEWIS, GOLDMAN & METZ
215 S. CALHOUN STREET, #701
TALLAHASSEE, FL 32301
904-222-0720

BOB ELIAS FLORIDA PUBLIC SERVICE COMMISSION 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FL 32399 904-613-6189 RICHARD M. RINDLER
JAMES C. FALVEY
SWIDLER & BERLIN, CHARTERED
3000 K STREET, NW
SUITE 300
WASHINGTON, DC 20007
202-424-7500

KENNETH A. HOFFMAN, ESQ.
RUTLEDGE, ECENIA, UNDERWOOD,
PURNELL & HOFFMAN
215 SOUTH MONROE STREET
SUITE 420
TALLAHASSEE, FL 32301-1841
904-681-6788

PAUL KOUROUPAS
DIRECTOR, REGULSTORY AFFAIRS
TELEPORT COMM. GROUP INC.
TWO TELEPORT DRIVE
SUITE 300
STATEN ISLAND, NY 10311
718-355-2634

MICHAEL J. HENRY
MCI TELECOMMUNICATIONS CORP.
780 JOHNSON FERRY ROAD
SUITE 700
ATLANTA, GEORGIA 30342
843-6373

PETER M. DUNBAR, ESQ.
CHARLES W. MURPHY, ESQ.
PENNINGTON & HABEN, P.A.
215 SOUTH MONROE STREET
2ND FLOOR
TALLAHASSEE, FL 32301
904-222-3533

JILL BUTLER
FLORIDA REGULATORY DIRECTOR
TIME WARNER COMMUNICATIONS
2773 RED MAPLE RIDGE
TALLAHASSEE, FL 32301
904-942-1181

LAURA L. WILSON, ESQ. CHARLES F. DUDLEY, ESQ. FLORIDA CABLE TELECOMMUNICATIONS ASSN. 310 N. MONROE STREET TALLAHASSEE, FL 32301 904-681-1990

WILLIAM H. HIGGINS AT&T WIRELESS SERVICES SUITE 900 250 S. AUSTRALIAN AVENUE WEST PALM BEACH, FL 33401 407-655-7447

ANTHONY P. GILLMAN KIMBERLY CASWELL GTE FLORIDA, INC. c/o RICHARD M. FLETCHER 106 EAST COLLEGE AVENUE SUITE 1440 TALLAHASSEE, FL 32301 813-228-3087

TIMOTHY DEVINE
MFS COMMUNICATIONS
250 WILLIAMS STREET
SUITE 2200
ATLANTA, GA 30303
404-224-6115

DONALD L. CROSBY CONTINENTAL CABLEVISION 7800 BELFORT PARKWAY SUITE 270 JACKSONVILLE, FL 32256 904-731-8810

A. R. SCHLEIDEN
CONTINENTAL FIBER
TECHNOLOGIES D/B/A ALTERNET
4455 BAYMEADOWS ROAD
JACKSONVILLE, FL 32217
904-448-3390

BILL WIGINTON HYPERION TELECOMM. BOYCE PLAZA III 2570 BOYCE PLAZA ROAD PITTSBURGH, PA 15241 412-221-1888 SUE E. WEISKE TIME WARNER COMM. 160 INVERNESS DRIVE WEST ENGLEWOOD, CO 80112

nancy & white (BL)

## ONIGINAL FILE COPY

T		REBUTTAL TESTIMONY OF ANIRUDDHA (ANDY) BANERJEE
2		ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS, INC.
3		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4		DOCKET NO. 950985D-TP (TIME WARNER)
5		DECEMBER 18, 1995
6		
7		
8	Q.	Please state your name, address, and place of
9		employment.
10		
11	A.	My name is Aniruddha (Andy) Banerjee. I am a
12		Senior Consultant with National Economic Research
13		Associates, Inc., located at One Main Street,
14		Cambridge, MA 02142.
15		
16	Q.	Please give a brief description of your background
17		and experience.
18		
19	A.	I earned a Bachelor of Arts (with Honors) and a
20		Master of Arts degree in Economics from the
21		University of Delhi, India, in 1975 and 1977
22		respectively. I received a Ph.D. in Agricultural
23		Economics from the Pennsylvania State University in
24		1985. I have over eight years of experience
25		teaching undergraduate and graduate courses in

various fields of Economics, and have conducted 1 academic research that has led to publications and 2 conference presentations. 3 Since 1988, I have held various positions in the 5 telecommunications industry. Prior to my present 6 position, I have been an economist in the Market 7 8 Analysis & Forecasting Division at AT&T Communications in Bedminster, NJ, a Member of 9 Technical Staff at Bell Communications Research in 10 11 Livingston, NJ, and a Research Economist at BellSouth Telecommunications in Birmingham, AL. 12 these positions, I was responsible for conducting 13 14 economic and market analysis, building quantitative demand models for telecommunication services, 15 developing economic positions and strategies, and 16 17 providing expert testimony support on regulatory economic matters. In my present capacity, I 18 provide quantitative and policy analysis for 19 telecommunications industry clients principally on 20 matters of concern to local exchange carriers. 21 22 Have you previously filed testimony before this 23 0. 24 Commission?

- 1 A. Yes. I filed direct and rebuttal testimony on
- behalf of BellSouth Telecommunications, Inc., in
- 3 Docket 950985-TP on September 15, September 29,
- 4 November 27, December 4, and December 11,
- 5 respectively.

6

- 7 Q. What is the purpose of your testimony in this
- 8 Docket?

9

- 10 A. The purpose of my testimony is to respond to and,
- where necessary, show why the positions taken by
- some of the parties are inconsistent with sound
- 13 economic principles.

14

- 15 O. Did the parties raise any additional issues you
- need to address in their direct testimony filed on
- December 4, 1995 in response to the Petition filed
- by Time Warner AxS of Florida, L. P. and Digital
- 19 Media Partners (Time Warner) on November 20, 1995?

20

- 21 A. No. In fact, most simply adopted their previously
- 22 filed testimony by reference; therefore, I adopt by
- reference my rebuttal testimony dated November 27,
- 24 1995 and December 11, filed with the Florida Public
- 25 Service Commission in Docket 950985A-TP and

```
1 950985B/C-TP.
2
3 Q. Does that conclude your testimony?
4
5 A. Yes.
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
```