

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
2 **DOCKET NO. 950985-TP**
3 **DIRECT TESTIMONY OF**
4 **DON J. WOOD**
5 **ON BEHALF OF TIME WARNER AXS OF FLORIDA, L.P.A.**
6 **AND DIGITAL MEDIA PARTNERS**

7
8 **Q: PLEASE STATE YOUR NAME AND ADDRESS.**

9 A: My name is Don J. Wood, and my business address is
10 914 Streatm Valley Trail, Alpharetta, Georgia
11 30202. I provide consulting services to the
12 ratepayers and regulators of telecommunications
13 utilities.

14
15 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
16 **BACKGROUND AND EXPERIENCE.**

17 A: I received a BBA in Finance with distinction from
18 Emory University and an MBA with concentrations in
19 Finance and Microeconomics from the College of
20 William and Mary. My telecommunications experience
21 includes employment at both a Regional Bell
22 Operating Company ("RBOC") and an interexchange
23 company ("IXC").

1 I was employed in the local exchange industry by
2 BellSouth Services, Inc. in its Pricing and
3 Economics, Service Cost Division. My
4 responsibilities included performing cost analyses
5 of new and existing services, preparing
6 documentation for filings with state regulatory
7 commissions and the Federal Communications
8 Commission ("FCC"), developing methodology and
9 computer models for use by other analysts, and
10 performing special assembly cost studies. I was
11 employed in the interexchange industry by MCI
12 Telecommunications Corporations, as Manager of
13 Regulatory Analysis for the Southern Division. In
14 this capacity I was responsible for the development
15 and implementation of regulatory policy for
16 operations in the southern U.S. I then served as a
17 Manager in the Economic Analysis and Regulatory
18 Affairs Organization, where I participated in the
19 development of regulatory policy for national
20 issues.

21

22 **Q: HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE**
23 **STATE REGULATORY COMMISSIONS?**

24 **A:** Yes. I have testified on telecommunications issues
25 before the regulatory commissions of twenty-three

1 states, the District of Columbia, state courts, and
2 have presented comments to the FCC. A listing of
3 my previous testimony is attached as Exhibit DJW-1.
4

5 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 **A:** Pursuant to Section 364.162, Florida Statutes, Time
7 Warner AxS and DMP have petitioned the Florida
8 Public Service Commission (FPSC or Commission) to
9 establish nondiscriminatory rates, terms, and
10 conditions for local interconnection with Sprint
11 United Telephone Company of Florida (Sprint
12 United). My testimony is filed in support of those
13 petitions.
14

15 The successful resolution of interconnection issues
16 between Time Warner and Sprint United should create
17 and sustain a marketplace in which local exchange
18 competition can flourish. A competitive market
19 will provide consumers with innovative services at
20 lower prices and fulfill the mandate of the Florida
21 Legislature. In order to accomplish these
22 objectives, it is essential that Time Warner be
23 treated as a co-carrier for the provision of local
24 exchange service.

1 To allow Time Warner to efficiently use its network
2 to offer innovative consumer products, the
3 Commission should require the following:

- 4 • a rate structure for mutual interconnection
5 that enables Time Warner to develop an
6 efficient network, which would include bill
7 and keep for local interconnection, and
8 imputation of appropriate interconnection
9 costs; tariffing of interconnection rates;
10 recognition of the impact of collocation
11 costs; and options for Time Warner's
12 interconnection points with Sprint United.
- 13 • efficient and cooperative network coordination
14 between Sprint United and Time Warner, which
15 would include mutual network management and
16 design (discussed by Time Warner witness Dan
17 Engleman).
- 18 • equal priority notification on outages;
19 cooperative 911 network arrangements and
20 database access; access of Time Warner to
21 adequate numbering resources; compensation for
22 terminating access charges to ported numbers.
23 These issues are addressed by Time Warner
24 witness Joan McGrath.

1 • access to and use of existing operator and
2 directory functions, which would include
3 access to operator services; input of
4 directory assistance and directory listings
5 provided at no charge; options for the
6 provision of directory assistance; free white
7 page/yellow page listings for Time Warner
8 customers; an information page in the
9 directory for Time Warner; directories
10 provided and distributed free of charge to
11 Time Warner customers. These issues are also
12 addressed by Time Warner witness McGrath. -

13

14 **Q: WHAT IS LOCAL INTERCONNECTION?**

15 **A:** Local interconnection is the ability of two local
16 exchange service providers to connect their
17 networks to provide service. This allows customers
18 from one company's network to communicate with
19 customers from another company's network.
20 Interconnection encompasses an array of technical
21 issues, as well as compensation arrangements needed
22 for two or more local exchange providers to connect
23 their networks. Interconnection also includes the
24 provision of service provider number portability,
25 coordinated network design and architecture, the

1 arrangement of signaling, the transfer of
2 information, access to data bases and billing
3 information, and many other detailed coordination
4 requirements. Equitable interconnection is
5 necessary to ensure that consumers will benefit
6 from local competition.

7

8 **Q: WHY IS LOCAL INTERCONNECTION SO IMPORTANT TO TIME**
9 **WARNER?**

10 **A:** Without nondiscriminatory interconnection with
11 Sprint United, Time Warner will be unable to
12 ubiquitously serve its potential residential and
13 business customers.

14

15 **Q: WHAT KIND OF ENVIRONMENT IS TIME WARNER FACING AS**
16 **IT ENTERS THE LOCAL EXCHANGE TELECOMMUNICATIONS**
17 **MARKET?**

18 **A:** Time Warner is entering an environment
19 characterized by the overwhelming dominance of one
20 monopoly LEC, Sprint United. In each of its local
21 exchanges Sprint United has nearly 100% of the
22 market, a ubiquitous network, brand identity and
23 loyalty, and control over essential facilities that
24 Time Warner needs in order to begin serving
25 consumers. For competition to be sustainable,

1 facilities-based providers--companies which invest
2 in, own, and operate switches and networks--must be
3 able to provide service. To do so, ALECs such as
4 Time Warner must make large investments in their
5 own networks and must also connect those networks
6 with that of the ubiquitous incumbent LEC, in this
7 case Sprint United, which stands to lose market
8 share (although not necessarily revenues) by such
9 interconnection. Thus, Sprint United will have
10 little self-interest or economic incentive to enter
11 into interconnection arrangements that are
12 economically viable and technically efficient for
13 the new entrant.

14
15 Time Warner must build brand loyalty by providing
16 better service at lower prices in order to gain
17 market share. If consumers perceive the service
18 Time Warner provides to be in any way inferior to
19 that of Sprint United, Time Warner will not be able
20 to attract and keep customers. This will be true
21 even if the perceived deficiency is caused by the
22 operating systems, practices, or interconnection
23 offerings of Sprint United. Without
24 nondiscriminatory and equal interconnection to
25 Sprint United's networks by Time Warner, customers

1 are denied the very real benefits of competition--
2 technological innovation and lower prices.

3

4 Q: WHEN DETERMINING INTERCONNECTION COMPENSATION
5 ARRANGEMENTS AND RELATED ISSUES, WHAT FACTORS
6 SHOULD THE COMMISSION TAKE INTO ACCOUNT TO RENDER A
7 POLICY DECISION THAT PROMOTES COMPETITION TO THE
8 ULTIMATE BENEFIT OF CONSUMERS?

9 A: There are several factors:

- 10 • First, the Commission should consider that the
11 only way Time Warner can reach all consumers
12 today is through Sprint United's ubiquitous
13 network. Although the LECs argue that having
14 to serve everyone everywhere is a burden, they
15 gain marketing benefits from a ubiquitous
16 network. (AT&T exploited a similar
17 circumstance in its advertising during the
18 early years of toll competition.) Because of
19 LEC ubiquity, every entrant that wants to do
20 business must interconnect with the LEC.
- 21 • Second, the Commission should consider the
22 impact of various rate structures and levels
23 on the development of competition and
24 promotion of customer choice and innovative
25 technology.

1 It is my understanding that the Commission's
2 objective is to ensure the availability of the
3 widest range of consumer choice at the best
4 price. The absolute best way to provide
5 consumers with superior, innovative local
6 exchange service and the lowest price is to
7 provide consumers with choices.

8 • Third, interconnection arrangements should
9 create incentives for competitive
10 infrastructure development. The development
11 of sustainable competition will be
12 significantly enhanced if competitors do not
13 have to rely exclusively on the LEC for the
14 provision of service. Interconnection
15 arrangements should encourage companies to
16 invest in plant and drive facilities-based
17 competition where facilities-based competition
18 is efficient.

19 • Fourth, interconnection arrangements should
20 promote technological innovation and encourage
21 timely implementation of new technologies as
22 they become available. The Legislature has
23 directed the Commission to exercise its
24 jurisdiction to encourage not only consumer
25 choice of new providers, but also to encourage

1 the introduction of new services. The price
2 structure for interconnection should not be
3 tied to price structures which force a new
4 market entrant such as Time Warner to
5 subsidize the inefficiencies of the incumbent
6 LECs or duplicate the incumbent LECs' pricing
7 structures.

8 • Fifth, interconnection rates should not
9 include a contribution to universal service.
10 Interconnection compensation arrangements
11 should promote the introduction of competition
12 and should permit efficient pricing of local
13 service. The funding of a permanent universal
14 service mechanism, to the extent necessary,
15 should remain an issue that is separate and
16 distinct from the pricing of interconnection.

17 • Sixth, service provider number portability is
18 necessary for Time Warner to compete. In
19 surveys, customers have told Time Warner that
20 they value retaining their local telephone
21 number. Remote call forwarding, the only
22 currently viable option for temporary number
23 portability, is an inferior technology. As a
24 result of some of the shortcomings of remote
25 call forwarding for temporary number

1 portability, Time Warner experiences longer
2 call set-up times, customer confusion, and
3 loss of the availability of some custom
4 calling features. These problems can be a
5 perceived drawback for consumers considering
6 using Time Warner.

7
8 Further, because toll calls lose their
9 identity when they arrive at the Sprint United
10 switch on the way to Time Warner's switch,
11 Time Warner would lose terminating access
12 charge revenues on calls to ported numbers.
13 The parties to the stipulation in the number
14 portability docket (No. 950737-TP) agreed that
15 compensation issues such as the loss of
16 terminating access charges to ported numbers
17 would be a subject of interconnection
18 negotiations.

19

20 **Q: WHAT ARE THE APPROPRIATE RATE STRUCTURES,**
21 **INTERCONNECTION RATES, AND OTHER COMPENSATION FOR**
22 **THE EXCHANGE OF LOCAL TRAFFIC BETWEEN TIME WARNER**
23 **AND SPRINT UNITED?**

24 **A: The most appropriate arrangement for the exchange**
25 **of local traffic is a bill and keep arrangement.**

1 Q: WHAT IS BILL AND KEEP?

2 A: Bill and keep is the local interconnection
3 arrangement most often employed between incumbent
4 LECs today in Florida. With bill and keep the two
5 networks connect at some agreed-upon point, and
6 each company bears the cost of its network, keeping
7 the revenues it generates, and not charging the
8 other company to use its network. Bill and keep is
9 a "payment in kind" for local interconnection,
10 thus, meeting the statutory requirement that it
11 cover costs.

12

13 Q: WHY DO YOU RECOMMEND A BILL AND KEEP ARRANGEMENT?

14 A: There are a number of reasons why I recommend a
15 bill and keep arrangement.

16 • First, a bill and keep arrangement is
17 reciprocal, thus acknowledging that all
18 participants are co-carriers. Competing local
19 exchange carriers should be treated as co-
20 carriers in light of the fact that the
21 necessity for interconnection is mutual once
22 an entrant signs up its first customer. In
23 this case, once Time Warner gains its first
24 customer, both Sprint United and Time Warner
25 will have a mutual need for services from the

1 other if each is to offer its customers the
2 ability to reach all telephone subscribers
3 served by the other local service provider.
4 • Second, bill and keep is certainly the least
5 cost method of compensation for terminating
6 traffic, and thus, is the approach most likely
7 to help drive local exchange rates as low as
8 possible for customers.
9 • Third, bill and keep will minimize the
10 opportunity for incumbent LECs to use the
11 compensation mechanism to impose unnecessary
12 and anti-competitive costs upon Time Warner.
13 Thus, it is the method least likely to result
14 in new, unnecessary barriers to entry.
15 • Fourth, bill and keep is neutral in terms of
16 both the technology and architecture that Time
17 Warner might choose to adopt. Opening the
18 local exchange to entry and developing local
19 exchange competition benefits Florida
20 residents with competition between different
21 technologies and different architectures. If
22 the compensation arrangements for terminating
23 traffic force new providers to choose inferior
24 technology or architecture, then a primary
25 benefit of entry will be reduced or

1 eliminated. Such a result would not be in the
2 public interest.

3

4 **Q: HOW DOES BILL AND KEEP ELIMINATE COSTS THAT ACT AS**
5 **A BARRIER TO ENTRY?**

6 A: Once there is local competition, the amount of
7 compensation owed to one network would be offset by
8 the amount owed to the other. Unless there are
9 significant distortions between networks, the
10 traffic between networks should be in balance over
11 time. Sprint United has proposed a flat rate port
12 charge, which could be a reasonable structure,
13 since it eliminates the need to measure all calls
14 flowing between the two networks. However, Sprint
15 United has chosen to establish an excessive price
16 for its ports, creating a price squeeze. Put
17 simply, Time Warner cannot pay the rates for
18 interconnection proposed by Sprint United and offer
19 a competitively priced service option to potential
20 residential or business customers.

21

22 **Q: HAVE ANY OTHER STATES ADOPTED BILL AND KEEP?**

23 A: Yes. Bill and keep has gained approval in a number
24 of states that have addressed interconnection
25 issues. The California PUC recently adopted

1 interim local competition rules that include bill
2 and keep. (See, *Initial Rules for Local Exchange*
3 *Service Competition in California*, California
4 Public Utilities Commission, Docket No. R 95-04-
5 043/I 95-04-044, Section 7: Interconnection of LEC
6 and CLEC Networks for Termination of Local Traffic,
7 page 10 [July 24, 1995].) A Michigan Public
8 Service Commission decision also adopts bill and
9 keep if the traffic is in balance within five
10 percent. (See, *Opinion and Order, In the matter of*
11 *the application of City Signal, Inc.*, Case No. U-
12 10647, pages 19-30 [February 27, 1995].) Recently,
13 the Connecticut Commission also adopted bill and
14 keep for twelve months, with five options, chosen
15 by the ALEC, at the end of that time. (See, *DPUC*
16 *Investigation into the Unbundling of the Southern*
17 *New England Telephone Company's Local*
18 *Telecommunications Network*, State of Connecticut
19 Department of Public Utility Control, Docket No.
20 94-10-02, pages 63, 70, 71 [September 22, 1995].)
21 Also, the Washington Utilities and Transportation
22 Commission recently ordered bill and keep until a
23 database number portability solution is reached.
24 Thereafter, unless proven otherwise,
25 interconnection rates will be cost based. (See,

1 *Fourth Supplemental Order Rejecting Tariff Filings*
2 *and Ordering Refiling; Granting Complaints, in*
3 *Part, Washington Utilities and Transportation*
4 *Commission; Docket Nos. UT-941464, UT-941465, UT-*
5 *950146, UT-950265, pages 29-33 [October 31, 1995].)*
6 Also, the *Texas Public Utility Regulatory Act of*
7 *1995, Title III, Subtitle J, Section 3.458,*
8 requires that in the absence of a mutually agreed
9 compensation rate, bill and keep shall apply for a
10 period of nine months.

11

12 **Q: IF THE COMMISSION REJECTS A BILL AND KEEP-**
13 **ARRANGEMENT, WHAT INTERCONNECTION ARRANGEMENT WOULD**
14 **YOU RECOMMEND?**

15 **A:** If the Commission rejects a bill and keep approach,
16 I recommend an interconnection charge that is
17 equally applied to Sprint United and Time Warner in
18 a nondiscriminatory fashion and which requires that
19 Sprint United, the holder of the bottleneck
20 monopoly network, pass an imputation test.
21 Imputation ensures that Sprint United cannot use
22 its bottleneck monopoly facilities to impose rates
23 on its competitors that are not also imposed on
24 Sprint United. For example, the use of flat rated
25 port for termination of local traffic instead of a

1 bill and keep approach would create a price squeeze
2 for Time Warner. The only way for the Commission
3 to avoid a price squeeze and not preclude
4 competitive entry would be to require Sprint United
5 to impute into its local exchange rates the same
6 rates it charges Time Warner. However, I would
7 like to reiterate my recommendation to institute
8 bill and keep for local interconnection, which has
9 the clear advantage of administrative simplicity
10 and which avoids the need for the development of an
11 imputation test for interconnection rates. Also,
12 the value of this compensation arrangement is
13 reflected in its adoption by states throughout the
14 country.

15

16 **Q: PLEASE EXPLAIN WHY SPRINT UNITED SHOULD BE REQUIRED**
17 **TO IMPUTE THE LOCAL INTERCONNECTION RATES THAT IT**
18 **CHARGES TO TIME WARNER INTO ITS LOCAL**
19 **INTERCONNECTION RATES.**

20 **A:** For the reasons described above, Time Warner must
21 purchase interconnection to Sprint United's network
22 in order to offer a ubiquitous service to its
23 customers. Within Sprint United's operating
24 territory, there is no alternative source of supply
25 for local network interconnection. In such a

1 scenario, interconnection to the network of the
2 incumbent carrier is, by definition, an essential
3 monopoly bottleneck function. The pricing of an
4 essential monopoly bottleneck function above the
5 level of properly calculated incremental cost
6 creates the opportunity for the incumbent carrier
7 to create a price squeeze. This opportunity,
8 combined with the incentives created by a
9 competitive, or potentially competitive
10 marketplace, make it essential that an imputation
11 standard be applied.

12
13 If interconnection is to be provided at an above-
14 cost rate, rather than at a rate set equal to
15 incremental cost or on a compensation in kind
16 basis, Sprint United should be required to impute
17 the rates that it charges to Time Warner in its
18 retail rate structure for local exchange services
19 in order to prevent such a price squeeze. Of
20 course, a bill and keep arrangement or the
21 establishment of interconnection rates equal to
22 incremental cost will likewise preclude this form
23 of anticompetitive pricing by Sprint United, but
24 bill and keep has the additional benefit of
25 administrative simplicity.

1 Q: IF THE COMMISSION SETS RATES, TERMS, AND CONDITIONS
2 FOR INTERCONNECTION BETWEEN TIME WARNER AND SPRINT
3 UNITED, SHOULD SPRINT UNITED TARIFF THE
4 INTERCONNECTION RATE(S) OR OTHER ARRANGEMENTS?

5 A: Yes. Tariffing implies a generally available
6 offering which can be purchased by like customers
7 under the same circumstances. Tariffs are
8 appropriate for monopoly services such as
9 interconnection.

10

11 Q: DO SPRINT UNITED'S PROPOSED COLLOCATION RATES
12 CREATE A BARRIER TO ENTRY FOR TIME WARNER? ..

13 A. Yes; Sprint United's proposed rates charged for
14 collocation have the ability to create an effective
15 barrier to entry for Time Warner. Time Warner
16 understands that the expenditures it makes for
17 entry into the telecommunications market cannot
18 easily be recovered should its market entry fail.
19 However, the greater the level of investment that
20 would be unrecoverable if entry were unsuccessful
21 (potential loss for the investor), the higher the
22 barrier to entry. If the potential loss is higher,
23 Time Warner's investors will expect greater returns
24 to make the investment a reasonable risk. The

1 higher expected returns will increase the cost of
2 doing business.

3
4 For example, collocation-related investment for
5 Time Warner includes the capital required to build
6 to Sprint United central office, equipment costs,
7 and the Sprint United rate elements applied to Time
8 Warner for collocation (floor space, power,
9 cabling, conduit, etc.). The costs for collocation
10 are nonrecoverable if market entry does not
11 succeed. To encourage competition, and to permit
12 end users to benefit from the lowest possible
13 prices, the rates for collocation should be as
14 close to cost as possible.

15

16 **Q: HOW SHOULD THE NETWORKS OF TIME WARNER AND SPRINT**
17 **UNITED BE INTERCONNECTED PHYSICALLY?**

18 **A:** To protect consumers and encourage the development
19 of competition, physical interconnection should be
20 done in the most efficient manner. To this end,
21 interconnection should be permitted wherever
22 reasonably possible, and should not be arbitrarily
23 limited. In addition, signaling networks need to
24 be interconnected and need to pass sufficient
25 signaling information so that all of the services

1 possible with current technology can be offered to
2 all customers.

3
4 Based on the types of interconnection available
5 today, interconnection is possible at several
6 points. For example, interexchange companies
7 interconnect with the LEC either at their own
8 points of presence or at the switch of the LEC.
9 Incumbent LECs often interconnect with each other
10 at a "meet point" (frequently at a company
11 boundary), which is a division of ownership of a
12 trunk connecting two switches owned by different
13 companies. In this context it is reasonable that
14 Time Warner should have the flexibility to
15 interconnect at a Sprint United end office, tandem,
16 or other mutually agreed upon point in the network-
17 -whichever is more efficient.

18

19 **Q: PLEASE SUMMARIZE YOUR TESTIMONY.**

20 **A:** Time Warner has petitioned the Commission because
21 negotiations with Sprint United have not been
22 fruitful. In order to manage the risk inherent in
23 making the necessary investment, Time Warner must
24 have certain resolution of all interconnection
25 issues before entering the market.

1 For Time Warner to have a reasonable chance to
2 compete, and so that consumers receive the benefits
3 of local competition, Time Warner believes that the
4 Commission should adopt a bill and keep approach
5 for local interconnection. Bill and keep is
6 payment in kind and covers Sprint United's cost of
7 interconnection. Further, Time Warner requests an
8 interconnection arrangement that permits and
9 encourages the following, in addition to the
10 recommendations of Time Warner witnesses Engleman
11 and McGrath:

- 12 • efficient network design by Time Warner
- 13 • options for interconnection points by Time
14 Warner in Sprint United's network
- 15 • imputation of essential monopoly inputs,
16 including collocation
- 17 • reasonable prices for collocation

18 In short, the Commission should develop a structure
19 that encourages competition by permitting Time
20 Warner to exercise reasonable control over its cost
21 of doing business.

22

23

24 **Q: DOES THIS COMPLETE YOUR TESTIMONY?**

25 **A: Yes, it does.**

Exhibit _____ (DJW-1)

Vita of Don J. Wood***914 Stream Valley Trail, Alpharetta, Georgia 30202 ■ (770) 475-9971, FAX (770) 475-9972***

EDUCATION

Emory University, Atlanta, Ga.
BBA in Finance, with Distinction.

College of William and Mary, Williamsburg, Va.
MBA, with concentration in Finance and Microeconomics.

CURRENT EMPLOYMENT

Don J. Wood provides economic and regulatory analysis services in telecommunications and related industries. He has been employed in a management capacity at a major Local Exchange Company and an Interexchange Carrier, and has been directly involved in both the development and implementation of regulatory policy. He has presented testimony before the Regulatory Commissions of twenty-three states and the District of Columbia, state courts, and has prepared comments for filing with the Federal Communications Commission.

PREVIOUS EXPERIENCE**BellSouth Services, Inc.**

Staff Manager responsible for conducting cost of service studies to be filed for regulatory purposes at State Commissions and FCC. Developed new costing methodologies and models for use by other analysts.

MCI Telecommunications Corporation.

Manager of Regulatory Analysis, Southeast Division. Responsible for development and implementation of regulatory policy for nine state division of the company. Duties included testimony before State Commissions, preparation of related pleadings, settlement negotiations, and development of relationships with Commission Staff and key industry personnel. After company reorganization, responsibilities expanded to new 15 state Southern Division.

Manager, Corporate Economic Analysis and Regulatory Affairs. Responsible for national regulatory policy development. Acted as part of a four person internal consulting team, specifically assigned to new/complex issues. Testimony before State Commissions throughout eastern US and comments/lobbying at FCC.

TESTIMONY - STATE REGULATORY COMMISSIONS:**Alabama Public Service Commission**

Docket No. 19356, Phase III: Alabama Public Service Commission vs. All Telephone Companies Operating in Alabama, and Docket 21455: AT&T Communications of the South Central States, Inc., Applicant, Application for a Certificate of Public Convenience and Necessity to Provide Limited IntraLATA Telecommunications Service in the State of Alabama.

Docket No. 20895: In Re: Petition for Approval to Introduce Business Line Termination for MCI's 800 Service.

Docket No. 21071: In Re: Petition by South Central Bell for Introduction of Bidirectional Measured Service.

Docket No. 21067: In Re: Petition by South Central Bell to Offer Dial Back-Up Service and 2400 BPS Central Office Data Set for Use with PulseLink Public Packet Switching Network Service.

Docket No. 21378: In Re: Petition by South Central Bell for Approval of Tariff Revisions to Restructure ESSX and Digital ESSX Service.

Docket No. 21865: In Re: Petition by South Central Bell for Approval of Tariff Revisions to Introduce Network Services to be Offered as a Part of Open Network Architecture.

Arkansas Public Service Commission

Docket No. 92-337-R: In the Matter of the Application for a Rule Limiting Collocation for Special Access to Virtual or Physical Collocation at the Option of the Local Exchange Carrier.

State of Connecticut, Department of Utility Control

Docket 91-12-19: DPUC Review of Intrastate Telecommunications Services Open to Competition (Comments).

Docket No. 94-07-02: Development of the Assumptions, Tests, Analysis, and Review to Govern Telecommunications Service Reclassifications in Light of the Eight Criteria Set Forth in Section 6 of Public Act 94-83 (Comments).

Delaware Public Service Commission

Docket No. 93-31T: In the Matter of the Application of The Diamond State Telephone Company for Establishment of Rules and Rates for the Provision of IntelliLinQ-PRI and IntelliLinQ-BRI.

Docket No. 41: In the Matter of the Development of Regulations for the Implementation of the Telecommunications Technology Investment Act.

Florida Public Service Commission

Docket No. 881257-TL: In Re: Proposed Tariff by Southern Bell to Introduce New Features for Digital ESSX Service, and to Provide Structural Changes for both ESSX Service and Digital ESSX Service.

Docket No. 880812-TP: In Re: Investigation into Equal Access Exchange Areas (EAEAs), Toll Monopoly Areas (TMAs), 1+ Restriction to the Local Exchange Companies (LECs), and Elimination of the Access Discount.

Docket No. 890183-TL: In Re: Generic Investigation into the Operations of Alternate Access Vendors.

Docket No. 870347-TI: In Re: Petition of AT&T Communications of the Southern States for Commission Forbearance from Earnings Regulation and Waiver of Rule 25-4.495(1) and 25-24.480 (1) (b), F.A.C., for a trial period.

Docket No. 900708-TL: In Re: Investigation of Methodology to Account for Access Charges in Local Exchange Company (LEC) Toll Pricing.

Docket No. 900633-TL: In Re: Development of Local Exchange Company Cost of Service Study Methodology.

Docket No. 910757-TP: In Re: Investigation into the Regulatory Safeguards Required to Prevent Cross-Subsidization by Telephone Companies.

Docket No. 920260-TL: In Re: Petition of Southern Bell Telephone and Telegraph Company for Rate Stabilization, Implementation Orders, and Other Relief.

Georgia Public Service Commission

Docket No. 3882-U: In Re: Investigation into Incentive Telephone Regulation in Georgia.

Docket No. 3883-U: In Re: Investigation into the Level and Structure of Intrastate Access Charges.

Docket No. 3921-U: In Re: Compliance and Implementation of Senate Bill 524.

Docket No. 3905-U: In Re: Southern Bell Rule Nisi.

Docket No. 3995-U: In Re: IntraLATA Toll Competition.

Docket No. 4018-U: In Re: Review of Open Network Architecture (ONA) (Comments).

Docket No. 5258-U: In Re: Petition of BellSouth Telecommunications for Consideration and Approval of its "Georgians FIRST" (Price Caps) Proposal.

Iowa Utilities Board

Docket No. RPU-95-10.

Docket No. RPU-95-11.

Kentucky Public Service Commission

Administrative Case No. 10321: In the Matter of the Tariff Filing of South Central Bell Telephone Company to Establish and Offer Pulselink Service.

Administrative Case No. 323: In the Matter of An Inquiry into IntraLATA Toll Competition, An Appropriate Compensation Scheme for Completion of IntraLATA Calls by Interexchange Carriers, and WATS Jurisdictionality.

- Phase IA: Determination of whether intraLATA toll competition is in the public interest.
- Phase IB: Determination of a method of implementing intraLATA competition.
- Rehearing on issue of Imputation.

Administrative Case No. 90-256, Phase II: In the Matter of A Review of the Rates and Charges and Incentive Regulation Plan of South Central Bell Telephone Company.

Administrative Case No. 336: In the Matter of an Investigation into the Elimination of Switched Access Service Discounts and Adoption of Time of Day Switch Access Service Rates.

Administrative Case No. 91-250: In the Matter of South Central Bell Telephone Company's Proposed Area Calling Service Tariff.

Louisiana Public Service Commission

Docket No. 17970: In Re: Investigation of the Revenue Requirements, Rate Structures, Charges, Services, Rate of Return, and Construction Program of AT&T Communications of the South Central States, Inc., in its Louisiana Operations.

Docket No. U-17949: In the Matter of an Investigation of the Revenue Requirements, Rate Structures, Charges, Services, Rate of Return, and Construction Program of South Central Bell Telephone Company, Its Louisiana Intrastate Operations, The Appropriate Level of Access Charges, and All Matters Relevant to the Rates and Service Rendered by the Company.

- Subdocket A (SCB Earnings Phase)
- Subdocket B (Generic Competition Phase)

Docket No. 18913-U: In Re: South Central Bell's Request for Approval of Tariff Revisions to Restructure ESSX and Digital ESSX Service.

Docket No. U-18851: In Re: Petition for Elimination of Disparity in Access Tariff Rates.

Public Service Commission of Maryland

Case 8584, Phase II: In the Matter of the Application of MFS Intelenet of Maryland, Inc. for Authority to Provide and Resell Local Exchange and Intrastate Telecommunications Services in Areas Served by C&P Telephone Company of Maryland.

Mississippi Public Service Commission

Docket No. U-5086: In Re: MCI Telecommunications Corporation's Metered Use Service Option D (Prism I) and Option E (Prism II).

Docket No. U-5112: In Re: MCI Telecommunications Corporation's Metered Use Option H (800 Service).

Docket No. U-5318: In Re: Petition of MCI for Approval of MCI's Provision of Service to a Specific Commercial Banking Customers for Intrastate Interexchange Telecommunications Service.

Docket 89-UN-5453: In Re: Notice and Application of South Central Bell Telephone Company for Adoption and Implementation of a Rate Stabilization Plan for its Mississippi Operations.

Docket No. 90-UA-0280: In Re: Order of the Mississippi Public Service Commission Initiating Hearings Concerning (1) IntraLATA Competition in the Telecommunications Industry and (2) Payment of Compensation by Interexchange Carriers and Resellers to Local Exchange Companies in Addition to Access Charges.

Docket No. 92-UA-0227: In Re: Order Implementing IntraLATA Competition.

New York Public Service Commission

Case No. 28425: Proceeding on Motion of the Commission as to the Impact of the Modification of Final Judgement and the Federal Communications Commission's Docket 78-72 on the Provision of Toll Service in New York State.

North Carolina Public Utilities Commission

Docket No. P-100, Sub 72: In the Matter of the Petition of AT&T to Amend Commission Rules Governing Regulation of Interexchange Carriers (Comments).

Docket No. P-141, Sub 19: In the Matter of the Application of MCI Telecommunications Corporation to Provide InterLATA Facilities-Based Telecommunications Services (Comments).

Public Utilities Commission of Ohio

Case No. 93-487-TP-ALT: In the Matter of the Application of The Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation.

Oklahoma Corporation Commission

Cause No. PUD 01448: In the Matter of the Application for an Order Limiting Collocation for Special Access to Virtual or Physical Collocation at the Option of the Local Exchange Carrier.

Public Utility Commission of Oregon

Docket No. UT 119: In the Matter of an Investigation into Tariffs Filed by US West Communications, Inc., United Telephone of the Northwest, Pacific Telecom, Inc., and GTE Northwest, Inc. in Accordance with ORS 759.185(4).

Pennsylvania Public Utilities Commission

Docket No. I-00910010: In Re: Generic Investigation into the Current Provision of InterLATA Toll Service.

Docket No. P-00930715: In Re: The Bell Telephone Company of Pennsylvania's Petition and Plan for Alternative Form of Regulation under Chapter 30.

Docket No. R-00943008: In Re: Pennsylvania Public Utility Commission v. Bell Atlantic-Pennsylvania, Inc. (Investigation of Proposed Promotional Offerings Tariff).

Docket No. M-00940587: In Re: Investigation pursuant to Section 3005 of the Public Utility Code, 66 Pa. C. S. §3005, and the Commission's Opinion and Order at Docket No. P-930715, to establish standards and safeguards for competitive services, with particular emphasis in the areas of cost allocations, cost studies, unbundling, and imputation, and to consider generic issues for future rulemaking.

South Carolina Public Service Commission

Docket No. 90-626-C: In Re: Generic Proceeding to Consider Intrastate Incentive Regulation.

Docket No. 90-321-C: In Re: Petition of Southern Bell Telephone and Telegraph Company for Revisions to its Access Service Tariff Nos. E2 and E16.

Docket No. 88-472-C: In Re: Petition of AT&T of the Southern States, Inc., Requesting the Commission to Initiate an Investigation Concerning the Level and Structure of Intrastate Carrier Common Line (CCL) Access Charges.

Docket No. 92-163-C: In Re: Position of Certain Participating South Carolina Local Exchange Companies for Approval of an Expanded Area Calling (EAC) Plan.

Docket No. 92-182-C: In Re: Application of MCI Telecommunications Corporation, AT&T Communications of the Southern States, Inc., and Sprint Communications Company, L.P., to Provide IntraLATA Telecommunications Services.

Docket No. 95-720-C: In Re: Application of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company for Approval of an Alternative Regulation Plan.

Tennessee Public Service Commission

Docket No. 90-05953: In Re: Earnings Investigation of South Central Bell Telephone Company.

Docket Nos. 89-11065, 89-11735, 89-12677: AT&T Communications of the South Central States, MCI Telecommunications Corporation, US Sprint Communications Company -- Application for Limited IntraLATA Telecommunications Certificate of Public Convenience and Necessity.

Docket No. 91-07501: South Central Bell Telephone Company's Application to Reflect Changes in its Switched Access Service Tariff to Limit Use of the 700 Access Code.

Public Utility Commission of Texas

Docket No. 12879: Application of Southwestern Bell Telephone Company for Expanded Interconnection for Special Access Services and Switched Transport Services and Unbundling of Special Access DS1 and DS3 Services Pursuant to P. U. C. Subst. R. 23.26.

Virginia State Corporation Commission

Case No. PUC920043: Application of Virginia Metrotel, Inc. for a Certificate of Public Convenience and Necessity to Provide InterLATA Interexchange Telecommunications Services.

Case No. PUC920029: Ex Parte: In the Matter of Evaluating the Experimental Plan for Alternative Regulation of Virginia Telephone Companies.

Case No. PUC930035: Application of Contel of Virginia, Inc. d/b/a GTE Virginia to implement community calling plans in various GTE Virginia exchanges within the Richmond and Lynchburg LATAs.

Case No. PUC930036: Ex Parte: In the Matter of Investigating Telephone Regulatory Methods Pursuant to Virginia Code § 56-235.5, & Etc.

Washington Utilities and Transportation Commission

Docket Nos. UT-941464, UT-941465, UT-950146, and UT-950265 (Consolidated): Washington Utilities and Transportation Commission, Complainant, vs. US West Communications, Inc., Respondent; TCG Seattle and Digital Direct of Seattle, Inc., Complainant, vs. US West Communications, Inc., Respondent; TCG Seattle, Complainant, vs. GTE Northwest Inc., Respondent; Electric Lightwave, Inc., vs. GTE

Northwest, Inc., Respondent.

Docket No. UT-950200: In the Matter of the Request of US West Communications, Inc. for an Increase in its Rates and Charges.

Public Service Commission of Wyoming

Docket No. 70000-TR-95-238: In the Matter of the General Rate/Price Case Application of US West Communications, Inc.

Public Service Commission of the District of Columbia

Formal Case No. 814, Phase IV: In the Matter of the Investigation into the Impact of the AT&T Divestiture and Decisions of the Federal Communications Commission on Bell Atlantic - Washington, D. C. Inc.'s Jurisdictional Rates.

COMMENTS - FEDERAL COMMUNICATIONS COMMISSION

CC Docket No. 92-91: In the Matter of Open Network Architecture Tariffs of Bell Operating Companies.

CC Docket No. 93-162: Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Special Access.

CC Docket No. 91-141: Common Carrier Bureau Inquiry into Local Exchange Company Term and Volume Discount Plans for Special Access.

CC Docket No. 94-97: Review of Virtual Expanded Interconnection Service Tariffs.

CC Docket No. 94-128: Open Network Architecture Tariffs of US West Communications, Inc.

CC Docket No. 94-97, Phase II: Investigation of Cost Issues, Virtual Expanded Interconnection Service Tariffs.