



**Rebecca B. DeCook**  
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March 13, 2004

Dale Hardy Roberts  
Secretary of the Commission  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65101

**FILED**

**MAR 15 2004**

**Missouri Public  
Service Commission**


**Re: Case No. IR-2004-0272**

Dear Mr. Secretary:

Attached for filing with the Commission, please find an original and eight (8) copies of AT&T Communications of the Southwest's Direct Testimony of Michael J. Pauls for the above referenced case.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

*Rebecca B. DeCook*  


Rebecca B. DeCook

Attachment  
cc: All Parties of Record

BEFORE THE CORPORATION COMMISSION  
OF THE STATE OF MISSOURI

FILED

MAR 15 2004

Missouri Public  
Service Commission

IN THE MATTER OF THE APPLICATION OF )  
FIDELITY TELEPHONE COMPANY FOR AUTHORITY )  
TO FILE, ESTABLISH, AND PUT INTO EFFECT )  
NEW, INCREASED, OR REVISED RATES AND )  
CHARGES FOR TELEPHONE SERVICE )

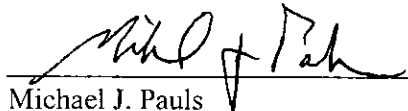
Case No. IR-2004-0272

AFFIDAVIT OF MICHAEL J. PAULS

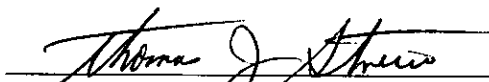
STATE OF MISSOURI )  
 ) ss:  
COUNTY OF JACKSON )

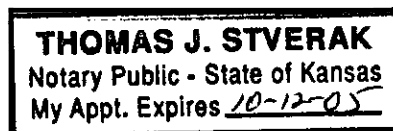
MICHAEL J. PAULS, of lawful age, being first duly sworn deposes and states:

1. My name is Michael J. Pauls. I am Manager, Access Landscape Management and am testifying on behalf of AT&T Communications of the Southwest, Inc.
2. Attached hereto and made a part hereof for all purposes is my testimony consisting of pages 1 through 12 and schedules 1 through 5.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

  
Michael J. Pauls

Subscribed and sworn on this 13 day of March, 2004.

  
Notary Public



My Commission Expires: 10-12-05

Exhibit No.:  
Issue(s): Rate Design  
Witness: Michael J. Pauls  
Type of Exhibit: Direct Testimony  
Sponsoring Party: AT&T Communications  
of the Southwest, Inc.  
Case No.: IR-2004-0272

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.**

**CASE NO.**

**IR-2004-0272**

**FILED**

**MAR 15 2004**

**Missouri Public  
Service Commission**

**DIRECT TESTIMONY**

**OF**

**MICHAEL J. PAULS**

Kansas City, Missouri  
March, 2004

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.**

**DIRECT TESTIMONY  
OF  
MICHAEL J. PAULS**

**CASE NO. IR-2004-0272**

1   **Q.   PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2   A.   My name is Michael J. Pauls. My business address is 2121 E. 63rd Street, Kansas  
3       City, Missouri 64130.

4

5   **Q.   BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6   A.   I am employed by AT&T as Manager, Access Landscape Management. My  
7       responsibilities include the review and analyses of intrastate access tariff filings  
8       and other related telecommunications regulatory issues in the state of Missouri.

9

10  **Q.   WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL  
11       BACKGROUND?**

12  A.   I received a Bachelor of Science degree in Finance (summa cum laude) from Fort  
13       Hays State University in 1979. I was awarded a Masters of Business  
14       Administration degree, with distinction, from Keller Graduate School of  
15       Management in 1992.

16

17  **Q.   WOULD YOU PLEASE DESCRIBE YOUR PREVIOUS WORK  
18       EXPERIENCE?**

19  A.   I was employed by Southwestern Bell Telephone Company ("SWBT") as a Rate  
20       and Cost Analyst in its Revenues and Public Affairs Department in 1979. In  
21       1983, I joined AT&T and have held various access service cost analyst, pricing

1 and regulatory positions within the Southwest Region State Government Affairs  
2 organization. I was appointed to my present position on January 1, 1993.

3

4 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY OR APPEARED AS AN**  
5 **EXPERT WITNESS BEFORE A REGULATORY BODY?**

6 A. Yes. Schedule MJP-1 provides a listing of other regulatory proceedings in which  
7 I have provided testimony on behalf of AT&T.

8

9 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**  
10 **PROCEEDING?**

11 A. The purpose of my testimony is to respond to the direct testimony of Fidelity  
12 Telephone Company ("Fidelity") witness Robert C. Schoonmaker. Specifically,  
13 my testimony will address Mr. Schoonmaker's direct testimony on the rate design  
14 proposed by Fidelity and associated changes in the structure of certain access rate  
15 elements.

16

17 **Q. WILL YOUR DIRECT TESTIMONY ADDRESS MR. SCHOONMAKER'S**  
18 **TESTIMONY ON FIDELITY'S REVENUE REQUIREMENT,**  
19 **DEPRECIATION RATES OR COST OF CAPITAL?**

20 A. No. AT&T takes no position in this proceeding in regards to Fidelity's revenue  
21 requirement, depreciation rates or cost of capital.

22

23 **ACCESS RATE RESTRUCTURE**

24 **Q. FIDELITY PROPOSES TO CONSOLIDATE THE LOCAL SWITCHING,**  
25 **ACCESS LINE SERVICE TERMINATION, AND DIRECTORY**

1       **ASSISTANCE INFORMATION ELEMENTS INTO A SINGLE ACCESS**  
2       **RATE ELEMENT. IS AT&T OPPOSED TO SUCH CONSOLIDATION?**

3       A.    No.   The proposed Fidelity consolidation would appear to be competitively  
4       neutral to all intrastate access customers.

5

6       **Q.    FIDELITY FURTHER PROPOSES TO REMOVE TARIFF PROVISIONS**  
7       **FOR CHARGING A MINIMUM MONTHLY CHARGE FOR SWITCHED**  
8       **ACCESS CIRCUITS. IS AT&T OPPOSED TO THIS PROPOSAL?**

9       A.    No.   The Fidelity proposal would appear to be competitively neutral to all  
10       intrastate access customers.

11

12       **Q.    FINALLY, FIDELITY PROPOSES TO REPLACE ITS CURRENT**  
13       **MILEAGE BAND LOCAL TRANSPORT STRUCTURE WITH A LOCAL**  
14       **TRANSPORT STRUCTURE THAT WOULD HAVE A SINGLE RATE**  
15       **PER MINUTE APPLIED TO ALL MINUTES, REGARDLESS OF THE**  
16       **EXCHANGES FROM WHICH THE CALL ORIGINATES OR IN WHICH**  
17       **IT TERMINATES. IS AT&T OPPOSED TO THIS RESTRUCTURE?**

18       A.    Yes.   The Fidelity proposal does not appear to be competitively neutral to all  
19       intrastate access customers.   In fact, even though the Fidelity local transport  
20       restructure is purported to be revenue neutral to all intrastate access customers as  
21       a group, there will be significant cost impacts to individual access customer.   As  
22       such, AT&T believes it to be inappropriate to further burden only certain  
23       intrastate access customers with increased local transport costs from Fidelity.

24

25       **Q.    WILL AT&T BE NEGATIVELY IMPACTED BY THE FIDELITY**  
26       **LOCAL TRANSPORT RESTRUCTURE PROPOSAL?**

1 A. Yes. AT&T estimates that the Fidelity local transport restructure proposal will  
2 result in increased intrastate access costs of \$89,164 per year. This is a 34%  
3 increase over the current AT&T intrastate local transport access costs.  
4

5 **Q. WHY WILL AT&T BE SO NEGATIVELY IMPACTED BY THE**  
6 **FIDELITY LOCAL TRANSPORT RESTRUCTURE PROPOSAL?**

7 A. It appears that the Fidelity local transport restructure proposal unjustly penalizes  
8 those access customers (like AT&T) that have built a "transport efficient"  
9 network within the Fidelity service area. For example, AT&T's current average  
10 local transport cost from Fidelity is \$0.0173 per minute of use. Fidelity's  
11 proposed restructured local transport rate is \$0.0232 per minute of use. In  
12 essence, those access customers (like AT&T) that have built infrastructure within  
13 the Fidelity service area to minimize the number of transport miles to be assessed  
14 local transport rates will be subsidizing those other access customers that have not  
15 sought to minimize local transport mileages. In my opinion, Fidelity has not  
16 justified why it is fair to force more transport efficient customers to pay higher  
17 local transport costs than less efficient access customers. Further, Fidelity  
18 provides no cost justification for its proposed local transport restructure.  
19 Fidelity's proposal to convert a distance sensitive access cost element into a per  
20 minute non-distance sensitive access cost element should be rejected by the  
21 Commission, especially due to the significant disparate cost impacts it will have  
22 on Fidelity's access customers.  
23

24 **Q. WHAT ALTERNATIVES WOULD YOU OFFER TO FIDELITY IN**  
25 **REGARD TO ITS PROPOSED INTRASTATE LOCAL TRANSPORT**  
26 **RESTRUCTURE?**

1 A. I would recommend that Fidelity either retain its existing mileage band transport  
2 structure (which would maintain competitive neutrality between all access  
3 customers) or restructure its intrastate local transport rates in a parity rate  
4 structure to its interstate local transport access tariff. If Fidelity truly desires to  
5 restructure its intrastate local transport access rates, it would seem to be more  
6 administratively and billing-efficient (for both Fidelity and its access customers)  
7 to utilize a more cost-causative rate structure that is already in place for its  
8 interstate access traffic and has passed the scrutiny of the FCC. Fidelity's  
9 interstate local transport structure appropriately provides access customers the  
10 opportunity to attain lower local transport costs by utilizing a more transport  
11 efficient network. This philosophy should be equally applicable in the state of  
12 Missouri for Fidelity.

13  
14 **SWITCHED ACCESS RATE INCREASE**

15 **Q. WHAT METHODOLOGY DOES FIDELITY PROPOSE IN SETTING ITS**  
16 **INTRASTATE SWITCHED ACCESS RATES IN THIS PROCEEDING?**

17 A. According to Mr. Schoonmaker, Fidelity's methodology is based on residually  
18 pricing its intrastate switched access rates. Essentially, any revenue requirement  
19 deficiency that remained after Fidelity adjusted its other rates was assigned to  
20 intrastate switched access service. This methodology resulted in a proposed  
21 36.18% increase to Fidelity's intrastate switched access rates. Of the total  
22 approximate \$2.4M revenue deficiency identified by Fidelity, slightly more than  
23 \$1.3M (54%) was assigned to intrastate switched access service.

24  
25 **Q. HOW DOES FIDELITY'S PROPOSED METHODOLOGY IMPACT ITS**  
26 **INTRASTATE SWITCHED ACCESS RATES?**



1 A. Based on Schedule RCS-11, Fidelity's current intrastate switched access rates are  
2 approximately \$0.081 per minute of use. Fidelity's proposed intrastate switched  
3 access rates are approximately \$0.11 per minute of use. As proposed, an access  
4 customer like AT&T would pay Fidelity \$0.11 for each minute of long distance  
5 service it originates in or terminates to the Fidelity service area—this is totally  
6 unacceptable to AT&T.

7

8 **Q. HOW DO FIDELITY'S CURRENT AND PROPOSED INTRASTATE**  
9 **SWITCHED ACCESS RATES COMPARE TO OTHER INCUMBENT**  
10 **LOCAL EXCHANGE COMPANIES ("ILECS") IN MISSOURI?**

11 A. Based on the Commission Staff's latest data, Fidelity's current average intrastate  
12 switched access rates are 16th highest out of the 43 ILECs in Missouri. Under  
13 Fidelity's proposal in this proceeding, its average intrastate rates would be the 8th  
14 highest out of the 43 ILECs in the state.

15

16 **Q. DO YOU AGREE WITH FIDELITY'S PROPOSED RESIDUAL**  
17 **INTRASTATE SWITCHED ACCESS PRICING METHODOLOGY OR**  
18 **ITS RESULTANT PROPOSED INTRASTATE SWITCHED ACCESS**  
19 **RATES?**

20 A. No. In my opinion, residually pricing intrastate switched access rates is bad  
21 public policy for the Commission to endorse. Likewise, the resultant Fidelity  
22 proposed intrastate switched access rates are not in the long-term best interest of  
23 access customers or end-user customers. Instead, the Commission should adopt  
24 an industry-wide rate design pricing model for Fidelity that will provide direction,  
25 stability, competitive balance and reasonableness for ILEC rates, access customer  
26 rates and, most importantly, end-user local and long distance rates.

1

2 **Q. WHY DO YOU BELIEVE THAT FIDELITY'S RATE DESIGN**  
3 **APPROACH IS BAD PUBLIC POLICY FOR THE COMMISSION TO**  
4 **ENDORSE?**

5 A. Fidelity's proposed rate design is a short-term band-aid approach that could easily  
6 result in iterative future rate cases and a "perfect storm" scenario for the company.  
7 In my opinion, Mr. Schoonmaker's rate design approach of giving subjective,  
8 non-cost based rate increases to only certain services based on what feels right is  
9 not sustainable in the long-term.

10

11 **Q. WHAT DO YOU MEAN BY YOUR REFERENCE TO A "PERFECT**  
12 **STORM" SCENARIO FOR FIDELITY?**

13 A. Fidelity proposes to load over one-half of its proposed revenue requirement  
14 deficiency on its intrastate switched access rates; rates that are already higher than  
15 the majority of the ILECs in the state. These increased access rates will put  
16 additional pressure on long distance providers (like AT&T) to raise toll rates,  
17 geographically deaverage toll rates, exit the market, reduce toll offerings,  
18 implement new special assessments, re-evaluate/revise toll resale contracts, etc.  
19 These long distance provider reactions to the switched access rate increases will  
20 further pressure Fidelity's end-user customers to re-evaluate whether and how  
21 they purchase and utilize long distance service. Many end-users already have,  
22 substituted "free" cellular long distance for traditional long distance service—this  
23 trend will continue. As a result, Fidelity's proposed newly inflated access  
24 revenues will continue to shrink with every traditional long distance minute that  
25 migrates off to cellular service and/or any other new long distance or Internet  
26 technology of the future. Once end-user customers have "cut the traditional long

1 distance cord”, they will be further incented to “cut the cord” completely to their  
2 traditional Fidelity local service and use cellular service only; this will cause  
3 additional negative pressures to the company’s intrastate revenue requirements.  
4 Fidelity would then be forced to file another rate case to recoup its revenue  
5 requirement deficiency. Using Fidelity’s proposed residual switched access  
6 pricing philosophy, the Commission would again raise Fidelity’s intrastate  
7 switched access rates to even higher levels in order to make Fidelity revenue  
8 requirement whole. Logically, as before, the trickle down long distance and  
9 technology substitution reactions to even higher Fidelity access rates will cause  
10 further erosion to the company’s revenues, resulting in another possible rate case  
11 and still higher switched access rates. The “perfect storm” is raging, with no way  
12 out.

13  
14 **Q. IS THERE A WAY TO AVOID A “PERFECT STORM” SCENARIO FOR**  
15 **FIDELITY?**

16 **A.** Yes. As stated earlier, the Commission should adopt an industry-wide rate design  
17 pricing model for Fidelity that will provide direction, stability, competitive  
18 balance and reasonableness for ILEC rates, access customer rates and, most  
19 importantly, end-user local and long distance rates.

20  
21 **Q. CAN YOU ELABORATE ON HOW THE COMMISSION SHOULD**  
22 **ADOPT SUCH A RATE DESIGN PRICING MODEL FOR FIDELITY?**

23 **A.** Yes. The Commission should first determine maximum just, reasonable and  
24 affordable (“JRA”) target rates for Fidelity’s residential local, business local and  
25 miscellaneous services. Second, the Commission should determine a cost-based  
26 target level for Fidelity’s intrastate switched access service rate and calculate the

1 revenue difference between it and the current access rate, based on test year  
2 quantities. The Commission should then add/subtract this intrastate access  
3 revenue difference to/from Fidelity's Commission-determined total revenue  
4 requirement deficiency to arrive at a local and miscellaneous revenue requirement  
5 deficiency. Next, the Commission should determine the incremental revenue to  
6 be derived from the maximum JRA target rates for residential local, business local  
7 and miscellaneous services. If this derived local/miscellaneous incremental  
8 revenue exceeds the remaining local/miscellaneous revenue requirement  
9 deficiency, the Commission should factor down the target rates proportionately--  
10 until the remaining local/miscellaneous revenue requirement deficiency is  
11 satisfied--and set Fidelity's rates at this level.

12  
13 If the derived local/miscellaneous incremental revenue is less than the remaining  
14 local/miscellaneous revenue requirement deficiency, the Commission should set  
15 Fidelity's local/miscellaneous rates at the maximum JRA target levels. Any  
16 revenue requirement shortfall should be reimbursed from a state High Cost Fund  
17 ("HCF") on a competitively neutral basis. This methodology would ensure that  
18 Fidelity would be made revenue requirement whole, yet its access and end-user  
19 customers would not be forced to bear an unreasonable share of its Commission-  
20 determined revenue requirement deficiency, thus avoiding a "perfect storm"  
21 scenario.

22  
23 **Q. COULD YOU PROVIDE AN ILLUSTRATIVE OF YOUR PROPOSED**  
24 **RATE DESIGN PRICING MODEL FOR FIDELITY?**

1 A. Yes. I would recommend a maximum residential local JRA target rate of \$15 per  
2 month and a maximum business local JRA target rate of \$30 per month.<sup>1</sup> I would  
3 further recommend that Fidelity set its intrastate switched access rate at the same  
4 \$0.035 per minute cost-based interconnection rate level that it has negotiated with  
5 wireless providers for termination of traffic.<sup>2</sup> This would implement a "minute-  
6 is-a-minute" concept and ensure competitive balance between wireless providers  
7 and traditional long distance providers, since the cost and physical process is no  
8 different between the two types of traffic termination. A \$0.035 per minute  
9 intrastate access rate would increase Fidelity's proposed revenue requirement  
10 deficiency an additional \$2.1M (to a total of \$4.5M). The \$15 per month JRA  
11 target residential local rate and \$30 per month JRA target business local rate  
12 would yield \$1.7M of incremental revenue to Fidelity and correspondingly reduce  
13 its proposed revenue requirement deficiency to \$2.8M. Fidelity would then  
14 receive the remaining \$2.8M deficiency from a state HCF in order to be made  
15 revenue requirement whole.

16  
17 **Q. REALIZING THAT A STATE HCF IS NOT YET IMPLEMENTED IN**  
18 **MISSOURI, HOW WOULD YOU PROPOSE FIDELITY BE MADE**  
19 **REVENUE REQUIREMENT WHOLE IN THIS INSTANT**  
20 **PROCEEDING?**

21 A. Absent a state HCF, the Commission should institute a temporary "high cost  
22 surcharge" on all of Fidelity's customers until a HCF can be implemented and  
23 funded. This would incent all parties to work expeditiously to ensure an  
24 operational state HCF as quickly as possible. Based on Mr. Schoonmaker's

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<sup>1</sup> For simplicity, this illustrative assumes no other local/miscellaneous rate changes for Fidelity.

<sup>2</sup> Pursuant to the direct testimony of Mr. Schoonmaker at the top of page 12.

1 proposed revenue requirement deficiency of \$2.4M, such high cost surcharge  
2 would be approximately 35% on all of Fidelity's customers.  
3

4 **Q. DO YOU ENVISION THIS RATE DESIGN PRICING MODEL BEING**  
5 **EXPANDED TO ALL NON-PRICE CAP ILECS IN MISSOURI?**

6 A. Yes. This approach would provide all non-price cap ILECs with a consistent  
7 industry-wide rate design that will provide direction, stability, competitive  
8 balance and reasonableness for ILEC rates, access customer rates and, most  
9 importantly, end-user local and long distance rates. ILEC pricing adjustments can  
10 be easily made to this model as future needs of the telecommunications industry  
11 dictates.  
12

13 **Q. ARE YOU AWARE OF ANY OTHER STATE JURISDICTION THAT**  
14 **HAS IMPLEMENTED A PROCESS SIMILAR TO YOUR**  
15 **RECOMMENDED RATE DESIGN PRICING MODEL FOR FIDELITY?**

16 A. Yes. The state of Kansas has many years of experience in balancing ILEC  
17 intrastate access rates and local rates with a state Universal Service Fund in order  
18 to achieve its regulatory and legislative goals for telecommunications. I would  
19 encourage the state of Missouri to also strongly consider such action.  
20

21 **Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

22 A. Yes. I have recommended that the Commission reject Fidelity's proposal to  
23 replace its current mileage band local transport structure with a single rate per  
24 minute local transport structure. I have further recommended that the  
25 Commission reject Fidelity's proposal to residually price its intrastate switched  
26 access rates. Instead, I propose the Commission adopt an industry-wide rate

1 design pricing model for Fidelity that will provide direction, stability, competitive  
2 balance and reasonableness for ILEC rates, access customer rates and, most  
3 importantly, end-user local and long distance rates in the state of Missouri.

4

5 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

6 **A.** Yes, it does.

## **TESTIMONY RÉSUMÉ -- MICHAEL J. PAULS**

### **Arkansas**

Docket No. 99-220-U; November, 1999 and August, 2002

In the Matter of the Joint Application of GTE Southwest Incorporated, GTE Arkansas Incorporated and GTE Midwest Incorporated for Authority to Sell and for CenturyTel of Northwest Arkansas, LLC. And CenturyTel of Central Arkansas, LLC. To Acquire Certain Assets and for Relinquishment of Certain Rights Under Certificates of Public Convenience and Necessity

Docket No. 97-450-U; January, 1998

In the Matter of Objection to Arkansas Universal Service Funds Requests

Docket No. 97-386-U; January, 1998

In the Matter of a Motion to Vacate Order No. 7 of Docket No. 93-142-U

Docket No. 86-160-U; September, 1998

In the Matter of Those Elements of the Intrastate Access Charge Maintained at Parity with Interstate Access

Docket No. 90-105-U; December, 1992

In the Matter of a Generic Proceeding to Address the Establishment of a Community Calling Plan on an Interim Basis

Docket No. 86-166-TF/86-186-TF; January, 1987

In the Matter of Tariff Filing of Southwestern Bell Telephone Company

### **Kansas**

Docket No. 01-GIMT-081-GIT; October, 2000

In the Matter of a General Investigation into the Reduction of Intrastate Access Charges for Rural Telephone Companies in Compliance with K.S.A. 66-2005(c)

Docket No. 00-GIMT-455-GIT; July, 2000

In the Matter of the Investigation into the Cost to Provide Local Service of the United Telephone Companies of Kansas d/b/a Sprint, as Required by K.S.A. 1998 Supp.66-2008(d)

Docket No. 00-GIMT-236-GIT; January, 2000

In the Matter of an Investigation to Determine the March 1, 2000 Assessment for the New Kansas Universal Service Fund Year

Docket No. 99-GIMT-784-GIT; August, 1999

In the Matter of a General Investigation into Issues Relating to Local Competition in the State of Kansas



Docket No. 98-GIMT-712-GIT; June, 1999

In the Matter of a General Investigation into IntraLATA Toll Dialing Parity Cost Recovery, PIC Change Charge and Other Issues

Docket No. 190,492-U (Phase II); June, 1996

In the Matter of a General Investigation into Competition within the Telecommunications Industry in the State of Kansas

Docket No. 190,383-U; November, 1995

In the Matter of a General Investigation into Access Charges

Docket No. 93-UTAT-426-TAR; November, 1993

In the Matter of United Telephone Association, Inc. Filing Access Service Tariff Table of Contents, Sheet 7; Section 4-SS7 Access Tariff, Original Sheets 1 through 18. (Introduction of SS7 Switched Access Service.)

### **Missouri**

Case No. TR-2001-65; August, 2002

In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service and the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri

Case No. TO-98-329; August, 2001

In the Matter of an Investigation into Various Issues Related to the Missouri Universal Service Fund

Case No. TC-2001-402; May, 2001

Staff of the Missouri Public Service Commission, Complainant, v. Ozark Telephone Company, Respondent.

Case No. TR-2001-344; March, 2001

In the Matter of Northeast Missouri Rural Telephone Company's Rate Case in Compliance with the Commission's Orders in Case Nos. TO-99-530 and TO-99-254.

Case No. TT-2001-115; December, 2000

In the Matter of the Access Tariff Filing of Green Hills Telephone Corporation.

Case No. TT-2001-116; December, 2000

In the Matter of the Access Tariff Filing of IAMO Telephone Company.

Case No. TT-2001-117; December, 2000

In the Matter of the Access Tariff Filing of Ozark Telephone Company.

Case No. TT-2001-118; December, 2000

In the Matter of the Access Tariff Filing of Peace Valley Telephone Co., Inc.

Case No. TT-2001-119; December, 2000

In the Matter of the Access Tariff Filing of Holway Telephone Company.

Case No. TT-2001-120; December, 2000

In the Matter of the Access Tariff Filing of KLM Telephone Company.

Case No. TT-2000-22; December, 1999

In the Matter of AT&T's Tariff Filing to Introduce an IntraLATA Overlay Plan, PSC Mo. No. 15

Case No. TO-99-254 et al.; April, 1999

In the Matter of an Investigation Concerning the Primary Toll Carrier Plan and IntraLATA Dialing Parity

Case No. TR-98-345; October, 1998

In the Matter of the Investigation into the Earnings of Lathrop Telephone Company

Case No. TC-98-350; September, 1998

In the Matter of the Investigation into the Earnings of Miller Telephone Company

Case No. TR-98-343; August, 1998

In the Matter of the Investigation by the Staff of the Missouri Public Service Commission into the Earnings of Mid-Missouri Telephone Company

Case No. TT-98-545; August, 1998

In the Matter of GTE Midwest Incorporated's Proposed Revision of its PSC Mo. No. 1 to Introduce LATA-Wide GTE Extended Reach Plan

Case No. TO-98-329; July, 1998

In the Matter of an Investigation into Various Issues Related to the Missouri Universal Service Fund

Case No. TT-98-351; April, 1998

In the Matter of Southwestern Bell Telephone Company's Tariff Revisions Designed to Introduce a LATA-Wide Extended Area Service (EAS) Called Local Plus, and a One-Way COS Plan

Case No. TO-98-216; April, 1998

The Investigation into the Over-earnings of Northeast Missouri Rural Telephone Company

Case No. TR-97-567; February, 1998

In Re the Investigation into the overearnings and modernization of Eastern Missouri Telephone Company, Missouri Telephone Company, and ALLTEL Missouri, Inc.

Case No. TO-97-217/220; August, 1997

In the Matter of an Investigation Concerning the Continuation or Modification of the Primary Toll Carrier Plan when IntraLATA Presubscription is Implemented in Missouri  
In the Matter of the Request for Suspension and Modification of Federal Communications Commission Rules Regarding IntraLATA Dialing Parity

Case No. TT-96-398; December, 1996

In the Matter of GTE Midwest Incorporated's Tariff Revision Designed to Provide IntraLATA Equal Access Conversion in GTE End Offices

Case No. TT-96-268; May, 1996

In the Matter of Southwestern Bell Telephone Company's Tariffs Designed to Revise P.S.C. Mo.-No. 26, Long Distance Message Telecommunications Services, to Introduce Designated Number Optional Calling Plan

Case No. TR-96-123; January, 1996

In the Matter of Steelville Telephone Exchange, Inc.'s Tariff Revisions Designed to Increase Rates for Telephone Service Provided to Customers in the Missouri Service Area of the Company

Case No. TT-96-21; November, 1995

In the Matter of Southwestern Bell Telephone Company's Tariffs to Revise P.S.C. Mo.-No. 36, Optional Payment Plan (Volume and Term Discounts) for Switched Access Service

Case No. TR-95-342; September, 1995

In the Matter of Southwestern Bell Telephone Company's Tariff Sheets Designed to Restructure Local Transport Rates

Case No. TC-93-224/192; May, 1993

The Staff of the Missouri Public Service Commission, Complainant, V. Southwestern Bell Telephone Company, A Missouri Corporation, Respondent  
In the Matter of Proposals to Establish an Alternative Regulation Plan for Southwestern Bell Telephone Company

Case No. TR-93-181; February, 1993

In the Matter of the Application of United Telephone Company of Missouri for Authority to File Tariffs Increasing Rates for Telephone Service to Customers in Missouri

### **Oklahoma**

Cause No. 200000471; December, 2000

Application of AT&T Communications of the Southwest, Inc. for an Order Revising the Intrastate Access Tariff of Southwestern Bell Telephone Company in Parity with Interstate Access Tariff

Cause No. 980000580/604; November, 1998

Applicant: Southwestern Bell Telephone Company; Chouteau Telephone Company; Pine Telephone Company; Totah Telephone Company. Relief Sought: Approval of Compensation Agreements for Local Plus and Area Wide Calling Service  
Applicant: Southwestern Bell Telephone Company and Salina-Spavinaw Telephone Company, Inc. Relief Sought: Approval of Compensation Agreement for Local Plus and Area Wide Calling Service

Cause No. 980000144; October, 1998

Application of Southwestern Bell Telephone Company for an Order Approving Proposed Revisions to Applicant's Access Service Tariff in Accordance with H.B. 1815

Cause No. 980000263; August, 1998

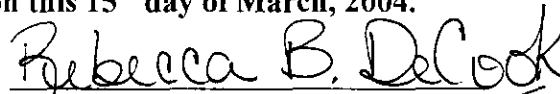
In the Matter of the Application of Atlas Telephone Company ET AL., for Approval of Tariffs

Cause No. 000254; September, 1988

In the Matter of the Application of Southwestern Bell Telephone Company for an Order Approving Proposed Additions and Changes in Applicant's Access Service Tariff and Wide Area Telecommunications Service Plan Tariff

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document has  
been sent to the parties of record shown via U.S.  
Mail on this 15<sup>th</sup> day of March, 2004.

  
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