

Exhibit No.:  
Issues:  
Witness: Pat Senft  
Sponsoring Party: BroadSpan Communications, Inc.  
d/b/a Primary Network Communications, Inc.  
Type of Exhibit: Direct Testimony  
Case No.: TC-2000-225, et al.

**BROADSPAN COMMUNICATIONS, INC.**  
**d/b/a PRIMARY NETWORK COMMUNICATIONS, INC.**

**DIRECT TESTIMONY**

**OF**

**PAT SENFT**

**CASE NO. TC-2000-225, et al.**

**FILED<sup>2</sup>**  
**MAY 01 2000**

Missouri Public  
Service Commission

**St. Louis, Missouri**  
**May 1, 2000**

FILED<sup>2</sup>

MAY 01 2000

Missouri Public  
Service Commission

STATE OF MISSOURI )  
 ) SS.  
COUNTY OF ST. LOUIS )

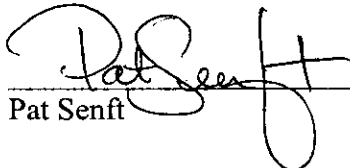
**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

MCI WorldCom Communications, Inc., )  
and Brooks Fiber Communications of )  
Missouri, Inc., )  
 )  
Complainants, ) Case No. TC-2000-225, et al.  
 )  
vs. )  
 )  
Southwestern Bell Telephone Company, )  
 )  
Respondent. )

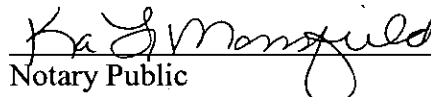
**AFFIDAVIT OF PAT SENFT**

Pat Senft, of lawful age, sound of mind and being first duly sworn, deposes and states:

1. My name is Pat Senft. I am the Controller for BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc.
2. Attached hereto and made a part hereof for all purposes is my direct testimony in the above-referenced case.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

  
Pat Senft

SUBSCRIBED AND SWORN TO before me, a Notary Public, this 28th day of April, 2000.

  
Notary Public

My Commission Expires 7-28-02



**Direct Testimony of Pat Senft**

**Q. Please state your name, your current position of employment, business address and your duties regarding Missouri reciprocal compensation.**

**A.** My name is Pat Senft. I am currently Controller with BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc. My business address is 11756 Borman Drive, Suite 101, St. Louis, Missouri 63146. My duties include preparing and reviewing monthly financial statements, recording the monthly journal entries, reconciling general ledger accounts, and coordinating the financing of major equipment purchases.

**Q. What is the purpose of your testimony.**

**A.** The purpose of my testimony is to identify the amount of reciprocal compensation that is currently due and owing from SWBT to PNC in Missouri.

**Q. What is the amount of the outstanding balance that is due and owing from SWBT to PNC for reciprocal compensation in Missouri?**

**A.** As of the last invoice sent to SWBT in April 6, 2000, the total amount that is due and owing from SWBT to PNC for reciprocal compensation in Missouri is \$2,134,008.46. I have attached as Senft Schedule 1 to my testimony a summary of amounts billed by PNC to SWBT for reciprocal compensation pursuant to the interconnection agreement between the companies in Missouri, as well as amounts paid by SWBT on such charges. The first column shows the dates of PNC's invoices to SWBT as well as the dates of payments from SWBT. The second column shows the month in which the underlying local traffic was terminated by PNC for SWBT. The third column states the total minutes of such

1 traffic. The fourth column states the reciprocal compensation charges for such minutes.  
2 The fifth column shows any adjustments. The sixth column is available to show finance  
3 charges, but none are shown because such charges will be separately calculated later  
4 either in negotiations with SWBT or in any court proceeding necessary to collect  
5 amounts owed. The seventh column restates the invoiced charges. The eighth column  
6 shows payments by SWBT. The ninth column shows the balance due, combining all  
7 invoices and payments as of each date shown. The tenth column indicates the invoices to  
8 which SWBT directed its payments.

9  
10 **Q. Did you prepare Senft Schedule 1?**

11 **A. Yes.**  
12

13 **Q. Is the information on Senft Schedule 1 accurate?**

14 **A. Yes.**  
15

16 **Q. What reciprocal compensation rates did you use?**

17 **A. The rates adopted by PNC from the Brooks/SWBT interconnect agreement and invoiced**  
18 **to SWBT, as described by Blake Ashby in his testimony.**  
19

20 **Q. Do the usage minutes stated in column three include local calls from SWBT**  
21 **customers to ISPs served by PNC?**

22 **A. The usage minutes comprise all local calls from SWBT customers to PNC customers,**  
23 **including ISPs served by PNC.**

1

2 **Q. Has SWBT paid reciprocal compensation to PNC on local calls from SWBT**  
3 **customers to ISPs served by PNC?**

4 **A.** Neither SWBT nor PNC can precisely segregate ISP-bound local calls from other local  
5 calls. However, SWBT has not paid PNC's invoices in full, and has indicated that it has  
6 attempted to avoid paying reciprocal compensation on ISP-bound local traffic.

7

8 **Q. Does this conclude your direct testimony?**

9 **A.** Yes.

**Primary Network Communications  
Reciprocal Compensation Transaction History  
Southwestern Bell of Missouri**

<u>Invoice Date</u>	<u>Usage Period</u>	<u>Usage - Minutes</u>	<u>Usage Charge</u>	<u>Adjustments</u>	<u>Finance Charge</u>	<u>Total Invoice</u>	<u>Payments</u>	<u>Balance</u>	<u>Comments</u>
9/1/99	Jul-99	29,130	\$ 209.75	\$ -	\$ -	\$ 209.75		\$ 209.75	
10/1/99	Aug-99	490,771	\$ 3,465.09	\$ -	\$ -	\$ 3,465.09		\$ 3,674.84	
10/31/99	Sep-99	11,059,401	\$ 78,627.62	\$ -	\$ -	\$ 78,627.62		\$ 82,302.46	
11/23/99	Oct-99	35,800,843	\$ 254,282.40	\$ -	\$ -	\$ 254,282.40		\$ 336,584.86	
12/20/99	Nov-99	37,874,862	\$ 270,803.60	\$ -	\$ -	\$ 270,803.60		\$ 607,388.46	
1/10/00			\$ -			\$ -	\$ 1,694.35	\$ 605,694.11	July, August, Sept
2/7/00			\$ -			\$ -	\$ 6,784.15	\$ 598,909.96	Oct, Nov
1/28/00	Dec-99	53,500,875	\$ 380,529.47	\$ -	\$ -	\$ 380,529.47		\$ 979,439.43	
2/17/00	Jan-00	55,865,536	\$ 397,316.61	\$ -	\$ -	\$ 397,316.61		\$ 1,376,756.04	
2/28/00							\$ 18,636.50	\$ 1,358,119.54	December
3/9/00	Feb-00	59,282,691	\$ 370,180.64	\$ -	\$ -	\$ 370,180.64		\$ 1,728,300.18	
3/21/00						\$ -	\$ 21,845.43	\$ 1,706,454.75	January
4/6/00	Mar-00	68,696,171	\$ 489,243.66	\$ -	\$ -	\$ 489,243.66		\$ 2,195,698.41	
4/17/00							\$ 61,689.95	\$ 2,134,008.46	February