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August 7, 2000

Dale Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Truman State Office Building, 5th Floor  
301 West High Street  
Jefferson City, Missouri 65101-1517

FILED<sup>2</sup>

AUG 07 2000

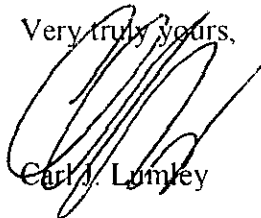
Missouri Public  
Service Commission

Re: Case No. TC-2000-225, et al.

Dear Mr. Roberts:

Enclosed please find for filing with the Commission in connection with the above-referenced proceeding an original and nine copies of Amendment to Direct Testimony of Pat Senft. Upon your receipt, please file stamp the extra copy received and return to the undersigned. If you have any questions, please do not hesitate to contact us.

Very truly yours,



Carl J. Lumley

CJL:dn

Enclosures

cc. Michael Dandino, Office of Public Counsel (W/Enclosure)  
Dan Joyce, General Counsel (W/Enclosure)  
Anthony Conroy, SWBT (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

FILED<sup>3</sup>

AUG 07 2000

Missouri Public  
Service Commission

MCI WorldCom Communications, Inc., )  
and Brooks Fiber Communications of )  
Missouri, Inc., and BroadSpan Communications, )  
Inc., d/b/a Primary Network Communications, )  
Inc., )

Complainants, )

Case No. TC-2000-225, et al.

vs. )

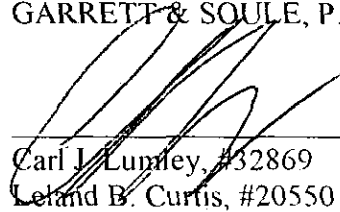
Southwestern Bell Telephone Company, )

Respondent. )

**AMENDMENT TO PREFILED DIRECT TESTIMONY OF**  
**PAT SENFT**

COME NOW Complainants and herewith file the following amended pages 2 and 3, attached hereto as Exhibit A, to the Direct Testimony of Pat Senft witness for BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc., which was filed with the Commission on May 1, 2000.

CURTIS, OETTING, HENIZ,  
GARRETT & SOULE, P.C.

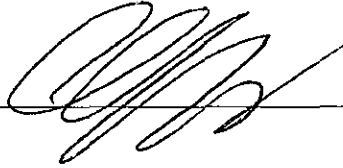
  
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Attorneys for BroadSpan Communications, Inc.  
d/b/a Primary Network Communications, Inc.

52

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was sent to all parties listed on the attached service list by fax, on the 7<sup>th</sup> day of August, 2000.



A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes, positioned above a horizontal line.

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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

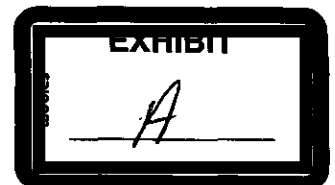
13 **Q. Is the information on Senft Schedule 1 accurate?**

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?**



1 A. The usage minutes comprise all local calls from SWBT customers to PNC customers that  
2 are subject to reciprocal compensation, which currently consists solely of calls  
3 terminating to an ISP served by PNC.  
4

5 **Q. Has SWBT paid reciprocal compensation to PNC on local calls from SWBT**  
6 **customers to the ISP served by PNC?**

7 A. SWBT has not paid PNC's invoices in full. While SWBT has indicated that it has  
8 attempted to avoid paying reciprocal compensation on ISP-bound local traffic, it has  
9 nonetheless made payments on such traffic.  
10

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

12 A. Yes.