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MISSOURI
PUBLIC SERVICE COMMISSION

Mr. Cecil Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street, Suite 530
Jefferson City, MO 65101

Re: In the Matter of an Investigation into the Provision of Community Optional Calling Service in Missouri.
Case No. TW-97-333

Dear Mr. Wright:

Enclosed for filling with the Missouri Public Service Commission are an original and 14 copies of Initial Brief of United Telephone Company of Missouri d/b/a Sprint.

If you have any questions, please do not hesitate to contact me at (913)345-7915

Sincerely,

Linda K. Gardner

Linda K. Gardner

LKG:ket
Enclosures
cc: All Counsel of Record (ww/ encl.)

BEFORE THE
PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of an Investigation into the Provision of Community Optional Calling Service in Missouri.	)))	Case No. TW-97-333

INITIAL BRIEF
OF
UNITED TELEPHONE COMPANY OF MISSOURI d/b/a SPRINT

This docket was opened to "review the community optional services (COS) as they are now provided in the State of Missouri in light of local competition and equal access issues." (Order Establishing Docket, TW-97-333, p. 1) Currently, COS is an optional toll plan ordered by the Commission to be provided by primary toll carriers[1] (PTCs). It is designed to provide a flat-rated option to toll charges for calling between exchanges that meet a community of interest criteria. For the flat-rated charge, a COS customer in a petitioning exchange may place unlimited calls to a number in the target exchange. In addition, any target exchange subscriber may place toll-free calls to that COS customer. At the time COS was modified to its present form, the Commission reasoned that the Out State Calling Area (OCA)[2] should provide an attractive alternative to COS. (Report and Order, Case No. T0-92-306, p.36). The Commission

[1] Southwestern Bell Telephone Company (SWBT), GTE, Fidelity Telephone Company and United Telephone Company of Missouri are the designated primary toll carriers (PTCs). The remaining local exchange telecommunications companies are considered secondary carriers (SCs).
[2] The OCA plan offers an option for flat-rated blocks of time for calling within a 23 mile radius of an exchange based upon toll rating mileage. According to the Commission, most COS routes were between exchanges within 23 miles. Furthermore, OCA was believed to adequately address the calling patterns of customers, thus COS subscription was predicted to diminish once OCA was fully implemented. (Report and Order, Case No. T0-92-306, p. 39-40). According to Staff, no COS route is believed to be further than 23 miles today. (T 793)

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believed that there would be a transition from COS to OCA with COS subscribers becoming a small minority of customers.

Absent COS, the calls between the target exchange and the petitioning exchanges would be toll calls. (Transcript[3] 206) As a toll call, the PTC receives toll revenue from the customer placing the call. (Id.) This is true whether that customer is in the petitioning exchange calling the target exchange or in the target exchange calling the petitioning exchange. (Id.) The PTC pays the secondary carrier (SC) access for the use of the SC's facilities in processing that toll call. (T 206-207) In many instances, the PTC pays the SC more in access expense than it receives from the customer in toll revenue.

To convert toll calls to COS calls, customers in the petitioning exchange must file a petition with the Commission to request expanded calling to the targeted exchange(s). (Ex. 32, p. 2) If the petition is sufficient, the Commission will direct the petitioning exchange company to conduct a calling study of the toll traffic to the target exchange to determine if a "community of interest" criteria exists. The "community of interest" criteria is met if there is an average of six calls or more per customer and two-thirds of the customers make two or more calls to the target exchange. (T 368) The calling study does not consider length of call so two one-minute calls satisfies the criteria as well as two sixty-minute calls. (T 825-826) Nor does the criteria attempt to determine whether the majority of customers would be economically better off with COS. One hundred and fifty nine (159) routes have passed the calling criteria and

[3] The transcript is hereinafter cited as "T". Exhibits will be cited as "Ex."

have COS implemented. (Ex. 32, Sch 1) The number of new routes implemented have steadily declined from a high of 82 in 1993 to 8 in 1996[4]. (Ex. 32, Sch. 2)

In Staff's experience, some routes that pass have a significant "community of interest" and others barely qualify. (T 773) In fact, passing the community of interest criteria does not correlate to a high percentage take rate. (T 337) COS "take" rates, or the percentage of eligible customers that subscribe to the service, vary widely. Overall, less than 13% of eligible customers subscribe to COS service. (Ex. 6, Sch. RCS-2) More than twice as many routes have take rates of 10% or less than take rates of 30% or more. (Id.; T 338) Indeed, even STCG witness Schoonmaker admits that in some instances, one must question how deep the "community of interest" is in light of the take rate. (T 400) When compared to all access lines in the state, only about one-half of one percent (½%) of customers are COS subscribers. (Ex. 24, p 3) Only about one percent (1%) of total outstate access lines (non-MCA access lines) are COS subscribers. (Id.)

Dividing the total number of petitioning to target exchange minutes by the number of COS customers results in an average, per customer, of approximately 7.75 hours of petitioning to target COS calls per month. (Ex. 6, p. 11, Sch RCS-2) Dividing the total number of target to petitioning exchange minutes by the number of COS customers results in an average, per COS subscriber, of approximately 5.75 hours of calls per month received by a COS subscriber from the target exchange. (Id) However, when examined on an exchange by exchange basis the results rarely reflect

[4] Two routes were implemented in 1997 and the remaining petitions have been stayed.

the average.[5] (Ex. 6, Sch RCS-2) In addition, it is not known how much of the calling is to an internet service provider which may be raising the calling average. (T 337)

Once the route passes the "community of interest" criteria, COS is implemented and any customer in the petitioning exchange may choose to subscribe to COS service. A rural or outstate residential COS customer would pay $16 per month for unlimited calling into the target exchange. A rural or outstate business COS customer would pay $33.50 per month for unlimited calling into the target exchange. Any subscriber in the target exchange could call the COS customer toll-free, and without paying any separate COS charge. (Ex. 33, p. 2) This $16 (residential) or $33.50 (business) per month in revenue the PTC receives from the customer replaces the toll revenue previously generated from this calling. (T 207-208) For the COS routes with petitioning exchanges served by the STCG and Mid-Missouri Group LECs, the net effect is that the SC's COS customers paid, collectively, approximately $1.3 million in COS charges while receiving the equivalent of $7.4 million worth of toll calling. (Ex. 7, p. 4)

While the PTC gets the $16 or $33.50 COS rate whether there is 1 hour or 100 hours of calling per month, the access expense paid by PTCs remains usage sensitive. (T 208-209) This access rate is the same rate whether the call is COS or toll.[6] (T 207) For SC exchanges, this results in the PTCs paying over $4 million in access fees to the SCs for the approximately $1.3 million in COS revenues. Assuming the COS customer

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[5] This can be calculated by route by dividing the minutes of use identified on Exhibit 6, Schedule RCS-2 for each route, petitioning to target and target to petitioning, by the number of COS subscribers in that petitioning exchange. The results vary widely. As SWBT witness Bourneuf states, "[c]clearly, the service is used to the benefit of a very small number of very high use customers." (Ex.24, p.3)

[6] Secondary Carriers have one intraLATA access rate applied to calls whether that call is COS or toll. (T 207) At the time COS was implemented, a true-up was performed which resulted in some secondary carriers reducing access rates to retain revenue neutrality for the SC in light of the stimulation experienced during the first six months of implementation.

made an economic choice in subscribing to the service, the net effect is that the PTC now receives even less revenue than when the customer subscribed to toll. However, the SC receives as much in access revenue, if not more due to stimulated usage and the addition of new COS routes. (T 326-327)[7]

To ensure that COS customers are not charged toll for calling to the target exchange and that all calls from the target exchange to that COS customer are not charged toll, a billing system adjustment method is employed:

> When Company A has a customer, X, who subscribes to COS service, Company A identifies in its billing system that subscriber X is a COS subscriber. In the process of developing its bill for subscriber X, Company A screens all toll calls recorded to subscriber X's account. All calls destined for the NXX code(s) of Company B's target exchange are removed from subscriber X's billing. In addition, Company A notifies Company B that subscriber X is a COS subscriber. In its billing system Company B identifies that subscriber X is a COS subscriber. Toll calls for all customers in Company B's target exchange have to be screened against subscriber X's telephone number and all calls made from the target exchange to subscriber X are removed from toll billing. (Ex. 6, p7).

In order for two-way COS to continue in a competitive 1+ intraLATA environment, all companies providing intraLATA service to the target exchange and back to the petitioning exchange would have to implement these billing system adjustments and all companies providing COS service in the petitioning exchange would need to notify the myriad of target exchange providers.

[7] The implementation of COS was expected to increase usage, and consequently, SC's access revenues. (T 325-327) In some instances, the SC made a one-time access adjustment based upon the stimulation experienced six months after implementation of the initial COS routes. (Id.) This one-time adjustment to bring access rates down was designed to maintain revenue neutrality for the SCs. While it was not the intention for the SCs to increase revenues as a result of COS, to the extent usage has increased more than anticipated initially and new routes have been added, the SCs have received increased access revenues paid by PTCs. (Id.)

A further complication to the continuation of two-way COS in a competitive environment is the calling usage studies. Competition and intraLATA presubscription will allow more and more carriers to serve the petitioning exchange customers and the target exchange customers. In order to complete a calling usage study, all providers handling petitioning to target exchange traffic would need to collect data for the same time frame for a particular route. Based upon staff's prior experience, staff expects there to be a great deal of difficulty in gathering this data from carriers unaccustomed to collecting route by route traffic in this manner. (Ex. 32, p.6)

Evening assuming the difficulties with calling usage studies and the complexities of the billing system adjustments can be overcome, the commission must consider whether COS should continue in the new competitive environment. The threshold question should be not how do we maintain a two-way COS service in the face of competition, but rather whether there needs to be a permanent Commission mandated COS service, whether competition and other services might satisfy the legitimate needs of the customers, and whether it is appropriate to continue to burden some carriers.

It is undisputed that COS is a below cost service. The net effect of this service being mandated at a below cost rate is two fold: the PTC must make up the losses elsewhere, which harms its customers and its ability to compete; and, competitors will be unable to compete for this traffic.

There is little dispute that when the PTC loses money in offering this service, its other customers must make up the difference. (See eg. T 285-286, 352; Ex. 31, p.2) According to STCG witness Schoonmaker, for every dollar in revenue received by a

PTC for providing COS to an end user, the PTC pays $3.31 in access expense to the SC. (T 329-330) For routes involving Sprint exchanges, Sprint receives an average of $.025 per minute in COS revenue while imputing over $.19 per minute. (Ex. 30, p.3) This type of revenue shortfall restricts the provider's ability to respond to competition in other toll products if COS losses are combined with other toll offerings for purposes of imputation. (Id.) Not only does this place the PTC at a competitive disadvantage when pricing toll, the bare losses must be recovered from the PTC's other customers. For SWBT, those losses resulted in increased directory listing rates and less of an earnings reduction than might otherwise have occurred. (T 570-571) For Sprint, the combined losses for MCA, COS and OCA were $3 million annually, with $1.2 million associated with COS and OCA. (T 738-740) Sprint raised local rates by $1.8 million to recover a portion of these losses.[8] As other local service providers enter the market, those providers will not have the shortfall from COS service to recover and will have a non-cost based price advantage. (Ex.30, p.3)

For potential competitors, COS service takes what was once toll traffic and converts it to COS traffic for which IXCs cannot effectively compete. As Comptel witness Ensrud described:

> So we [Comptel members] actually had customers who were paying us monies who we were serving when COS came along and deprived us of that revenue source, and we were under the impression – I mean, when you look at the economic reality, there's nothing you can do to go back and try to re-win or recapture those customers, because the underlying cost exceeds the cap, as I refer to it, that's priced by the COS service. (T 450)

[8] The remaining $1.2 million is received from SWBT under an agreement set to expire within a year. (T 738)

STCG witness Schoonmaker confirms, that as presently constructed, COS service is not attractive to a provider because costs exceed revenues. (T 363) Thus, mandating a below cost service such as COS distorts the market and artificially influences the consumers' choice of a long distance provider. No rational competitor with a choice would enter a market where it cannot make money.

As cited, only 1% of all outstate access lines and less than 13% of eligible customers subscribe to COS. If there is truly a community of interest need to be served, Sprint recommends the Commission convert the service to a traditional, non-optional EAS arrangement. Revising COS to mandatory EAS removes this traffic from that subject to intraLATA toll dialing parity. Doing so allows the EAS service to be available regardless of the interexchange carrier selected by the customer for provision of intraLATA toll. (Ex 29, p.6) The EAS additive would reflect costs and vary by exchange. (Id.) If a majority of customers support the movement to mandatory EAS the service would be implemented. (Id., p.7) If not, customers would need to choose other plans that best suit their needs and pocket books.

Another option is to phase out COS as customers are provided new options for intraLATA 1+ toll providers. COS would immediately be converted to one-way COS from petitioning to target exchanges until that exchange converts to 1+ intraLATA presubscription. At that time, carriers should be free to continue providing one-way COS but no carrier should be mandated to provide the service. This alternative avoids the difficult decision of determining which group of carriers must, or can, be mandated to provide the service. (Id., p.8)

I. Straw Proposals, Compensation Mechanism and Proposed Alternatives

A.1. Should Two-way COS be modified to use 800/888 Number Based Service for the return calling portion of the service?

As stated, if the Commission desires a two-way service, Sprint recommends revising COS to mandatory EAS submitted to a vote of the customers in the involved exchanges. Doing so recognizes that the service was originally designed to meet a community of interest need which may actually be lacking in many of today's COS routes. If the Commission nevertheless wants to consider maintaining a two-way COS-type service, it needs to carefully consider the ramifications of adopting an 800/888 solution that are over and above the issues already identified herein.

As the Commission is well aware, there are shortages of telephone numbers and 800/888 numbers are no exception. Under this alternative, the return call from the target to the petitioning exchange would be provided through a route specific, customer specific 800/888 number. Each COS customer would have two numbers, with one being an 800/888 number that is only applicable for calling from the target exchange. STCG witness Schoonmaker envisions this to apply in all cases and not just to those that choose to subscribe to the return call portion. (T 334) This poses several problems.

Telecommunications carriers cannot obtain an unlimited supply of 800/888 numbers simply by asking. Instead, the FCC has adopted an allocation process that makes it difficult to predict when all of the COS customers could be assigned an 800/888 number. Under this allocation procedure, there is an ongoing limit on the number of reserve 800/888 numbers that a telecommunications carrier can have at any point in time. (T 481) Carriers may not have more than the greater of 2,000 or 8% of in service 800/888 numbers in reserved status at any time. (T 482)

In addition, experience has shown that customers dislike using a second number for return calling. COS was once provided using two telephone numbers and remote call forwarding technology. (Ex. 23, p.7) At the time, customers complained about the need for two telephone numbers and the difficulties it posed with advertising and printing of supplies and the seemingly simple act of locating the correct COS number. (Id.) Add to this dissatisfaction, customer confusion with a 800/888 number that would be limited to calling from certain exchanges.

Lastly, the customer's other 800/888 service choices would be restricted. A customer would not be able to subscribe to both COS (provisioned with a limited-scope 800/888 return call number) and a service such as Common Line 800 service. (Id., p. 8) According to SWBT witness Bourneuf, since "both the COS 800 number and the Common Line 800 number would be associated with the same access line, it would be impossible to distinguish the usage for calls to one of the 800 numbers versus the other for billing purposes." (Id., p. 9)

A.2 Should One-Way Reciprocal COS Service replace two-way COS Service?

Sprint does not support one-way reciprocal COS service for all the reasons previously cited against continuing COS as a mandatory offering by a selected group of providers. Mandatory COS should be phased-out as customers are given new options for intraLATA 1+ service. If not converted to non-optional EAS, COS should be revised to a one-way service from petitioning to target exchanges only and then only mandated to be offered until intraLATA toll dialing parity is implemented in the petitioning exchange. If there is a sufficient community of interest from the target to the petitioning exchange, the target exchange may elect to petition for one-way COS into the petitioning exchange.

If the Commission nevertheless adopts one-way reciprocal COS it must resolve issues associated with multiple COS routes and the treatment of EAS points. Target COS exchanges are often larger communities that are the target exchanges on multiple COS routes. One-way reciprocal COS would be designed to allow a target exchange customer to choose COS into the petitioning exchange without the need to pass a community of interest test. However, that target exchange customer may wish to choose the reciprocal COS option for one petitioning exchange, all petitioning exchanges or any number in between. If each customer is permitted the unique choice, there are a multitude of combinations available.

> For example, SWBT's Springfield Metropolitan Exchange is currently the target COS exchange on 12 different COS routes. While on the surface 12 may seem like a manageable number of COS routes, in fact there are a total of 4,095 possible combinations of one or more of those 12 routes. However, under the LCC [line class codes] approach, several types of switches have technical limitations on the total number of possible LCCs. Among these, DMS 100 switches have a limitation of 1,024 LCCs. The COS target exchange of Springfield and St. Joseph are served by DMS 100 switches, whose LCC limitations would be exceeded by the number of COS route combinations for these exchanges. (Ex. 23, p. 13-14)

Leaving aside any technical limitations, the feasibility of administering or building the billing tables for such combinations must be seriously questioned.

A.3 Should one-way COS Service replace two-way COS service?

If COS is not replaced with non-optional EAS, one-way COS from the petitioning to target exchange should replace two-way COS service until implementation of 1+ intraLATA presubscription. There are may options for return calling. As Staff Witness Smith recites:

> If they have needs for calling to a community of interest where kids go to school and the school has a payphone, they don't want the kids to have to worry about coins and things, today we have prepaid calling cards. We have 800 number services. We have cellular services. Kids in Jefferson City public schools carry pagers. I mean, it just goes on and on in the alternatives they're already utilizing. (T 790)

Sprint is willing to offer one-way COS in the petitioning exchanges of its secondary carriers until the implementation of 1+ intraLATA dialing parity in those exchanges. (Ex. 31, p. 3-4) Thereafter, the service should not be mandated but optional to the carriers. If it is mandated, the SCs, or serving LEC, should provision the service. (Id.; T 469)

A.4 Should COS be eliminated completely?

COS as a mandated offering should be eliminated. There are approximately 17,000 COS subscribers. This equates to only about ½% of all access lines and only about 1% of all outstate access lines. Overall, less than 13% of all eligible subscribers choose COS service. As a below cost service, other PTC subscribers are making up the difference. In addition, this service is distorting the market which should not be condoned in the face of competition.

B.1. If some form of COS is preserved, should the current compensation mechanism for COS be retained?

B.2. If some form of COS is preserved, should it be classified as a local or a toll service?

As discussed, it is only the SCs that can propose that COS continue to be provisioned as a two-way service by the PTC and not be concerned about the effect on their company's revenue recovery. (Ex.31, p. 2) So long as COS is classified as "toll" subject to access charges and provisioned by the PTC, the SC is indifferent to the distortions caused by a flat-rate end user offering with intercompany compensation based upon usage. However, continuing to mandate a below cost service provisioned by the PTCs is not sustainable.

COS was originally designed to address a perceived community of interest calling need. As a two-way service today, it resembles EAS which allows calling to and from exchanges, toll-free. (Ex. 31, p. 2) The main difference between COS and EAS is the dialing pattern and the optional nature of the service. If the service is converted to EAS and provided as a local service by the serving LEC it would likely lower the overall cost of the service. (Id.) Under this scenario, the serving LEC of the petitioning exchange should be the provider of the one-way COS to customers in the petitioning exchange. Should the Commission mandate one-way reciprocally available COS, the LEC of the target exchange should be the COS provider for the reciprocal (target exchange to petitioning exchange) service. In both cases, the LEC providing COS should pay terminating compensation to any other LEC whose network is used to terminate COS traffic. The terminating compensation should be at the appropriate rate for local calls. This rate should be based on the lower local interconnection charges as negotiated between interconnecting companies and not tariffed access charges associated with toll. (Id., p. 2-3) In each case, the COS provider would receive and retain the COS revenue which should be cost based and vary by exchange. STCG witness Schoonmaker estimates that converting the routes to local service with a terminating compensation system may take between 6 and 18 months. (T335-336) In most cases, it could be done by February of 1999[9]. (T 336)

If Secondary Carriers experience a revenue shortfall after adjusting COS rates to reflect cost and after receipt of the interconnection charges, the SC may seek a rate increase from the Commission. The SC may seek cost based COS rates or it may seek to raise local exchange rates[10] or vertical services, both of which have been done by PTCs to provide this service. (T 591)

If the Commission adopts a two-way, 800 number-based serving arrangement, the LEC of the petitioning exchange should be the COS provider. That LEC should receive the COS revenue and pay the appropriate terminating rate to the target exchange LEC. In addition, the COS provider should pay the target exchange LEC originating compensation for the origination of the target exchange to petitioning exchange traffic.

[9] Under the Telecommunications Act of 1996, most non-RBOC LECs must implement 1+ intraLATA dialing parity by February 1999.

[10] Northeast Missouri Rural Telephone Company only receives less than 10% of its revenue from its $5 local exchange rates. (T 286, 296) The remaining 90% come from access charges, universal service funds and NECA pooling in cost settlements. (T 286)

B.3 If any form of COS is preserved, should aggregation and/or resale of COS service be allowed?

Resale should be permitted of any retail service offering. However, tariff restrictions, including aggregation, should still apply.

B.4. What is(are) the potential impact(s) of expected changes in the Primary Toll Carrier Plan on COS?

If, as Sprint recommends, COS is revised to a one-way service provided by the LEC serving the petitioning exchange or is revised to become mandatory EAS, then any changes to the PTC should have no impact on the revised COS service. However, any resolution of COS issues that is dependent upon the continuation of a mandatory COS offering by the existing PTCs is only a short-term solution since the PTC plan, as currently configured, cannot continue in an 1+ intraLATA environment.

II. Issues Set by the Commission

A. Is the appropriate pricing mechanism for one-way COS with reciprocal service the same as set out by the Staff in Case No. TT-96-398? If not, so indicate and substantiate an alternative proposal.

No, the price for COS in whatever form is adopted as a result of this docket should be based on the actual cost of providing the service. The problem of maintaining prices at a level below cost and the subsidies that are created by this policy should not be exacerbated in today's competitive environment by adding additional services priced in this manner when it can be avoided.

B. Shall all competitive LECs be required to offer this service?

Under Section 392.455 RSMo Supp. 1996, new entrants into the basic local exchange market must offer basic local telecommunication service as a separate and distinct service. By definition, "basic local telecommunications service" does not include "optional toll free calling outside a local calling scope but within a community of interest, available for an additional monthly fee..." Section 386.020(4) RSMo Supp 1996. Obviously, COS is not a basic service that is mandated to be offered by competitive local exchange companies.

If COS is a valuable service to end users and a significant number of customers demand COS or a similar service, a competitor will respond with an offering or be at a competitive disadvantage for that group of customers. As of March 1997, less than 1% of Sprint's customers subscribe to COS. To mandate that new entrants must provide a service that would create unique billing processes for such a limited set of customers could be viewed as a barrier to entry. (Ex. 29, p. 3-4)

C. What, if any, change must be made in the primary toll carrier (PTC) plan to accommodate or accomplish the proposed COS changes herein?

The PTC plan is inconsistent with the introduction of intraLATA toll dialing parity. The terms of the PTC plan dictate that all 1+ dialed intraLATA traffic be delivered to the PTC for that exchange. Toll dialing parity would violate this provision. However, the specific straw proposals herein do not appear to uniquely impact the PTC plan.

D. Shall the Commission stay all pending and future COS applications?

Yes.

E. What is the participants' proposal for educating the public?

The extent of public education efforts will depend upon the extent of the revisions to the existing COS. When COS was introduced, LECs used separate letters to notify customers. The letters were reviewed by Staff. This process could be used again. The logical time to implement changes to COS is at the time of intraLATA dialing parity implementation. (T 787) For the SCs, that may be as late as February 1999. According to STCG witness Schoonmaker, in most cases, the conversion and intercompany compensation issues associated with converting COS from a toll service to a local service could be completed by then. (T 335-336)

F. Please "explore and discuss the potential of LATA-wide or statewide flat-rate COS."

Competitive carriers should be free to develop plans that meet customer's expanded calling needs. Currently, COS is available in 12 of 79 Sprint exchanges. In those exchanges, less than 1% of Sprint's customers overall, subscribe to the service. Of those eligible to subscribe, approximately 19% do so. This level of subscribership simply does not appear to justify creation of a LATA-wide or statewide service.

Respectfully submitted,

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OF MISSOURI d/b/a SPRINT

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Certificate of Service

I hereby certify that a copy of the foregoing Initial Brief of United Telephone Company of Missouri d/b/a Sprint was served on the following by placing a copy of same in the U.S. Mail, postage prepaid, or by hand-delivery, this 7th day of August, 1997.

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