

Exhibit No:
Issues: Interconnection Agreement Negotiation
Witness: Eugene F. Springfield
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Southwestern Bell Telephone Company
Case No: TC-2000-225

FILED³
MAY 31 2000
**Missouri Public
Service Commission**

SOUTHWESTERN BELL TELEPHONE COMPANY

CASE NO. TC-2000-225

**Rebuttal Testimony
of**

Eugene F. Springfield

**San Antonio, Texas
May, 2000**

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
MAY 31 2000

Missouri Public
Service Commission

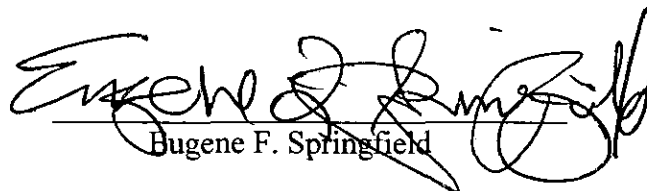
MCI WorldCom Communications, Inc.)
v.) Case No. TC-2000-225
Southwestern Bell Telephone Company)

AFFIDAVIT OF EUGENE F. SPRINGFIELD

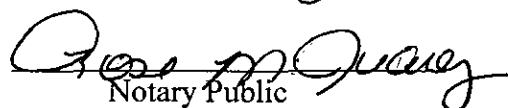
COUNTY OF BEXAR)
STATE OF TEXAS) SS

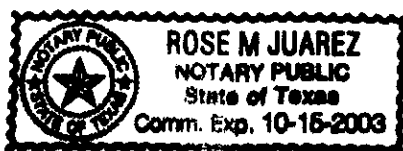
I, Eugene F. Springfield, of lawful age, being duly sworn, depose and state:

1. My name is Eugene F. Springfield. I am presently Executive Director – Tariffs, State Regulatory And Network Support for Southwestern Bell Telephone Company.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
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.


Eugene F. Springfield

Subscribed and sworn to before me on this 24 day of May 2000.


Notary Public



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

2

3 A. My name is Eugene F. Springfield. My business address is 530 McCullough, Room 12-U-10,
4 San Antonio, Texas 78218.

5

6 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?**

7

8 A. I am employed by Southwestern Bell Telephone Company ("SWBT " or "the Company") as
9 Executive Director –Tariffs, State Regulatory, and Network Support.

10

11 **Q. WHAT ARE THE RESPONSIBILITIES OF YOUR JOB AS EXECUTIVE**
12 **DIRECTOR – TARIFFS, STATE REGULATORY AND NETWORK SUPPORT?**

13

14 A. From January 1992 until January 2000, as Executive Director – Tariffs, State Regulatory and
15 Network Support, I was responsible for directing the development of all Local Exchange,
16 General Exchange, Private Line and Toll tariff-filing packages for the Company's state
17 jurisdictions. Additionally, I was responsible for coordinating the development and
18 administration of state regulatory policy matters for the Company's state jurisdictions.
19 Beginning January 1, 2000, my job responsibilities changed as a result of the restructuring of
20 the External Affairs department in connection with the SBC/Ameritech Merger. I am
21 currently responsible for insuring internal compliance with the plan developed by the
22 External Affairs department to consolidate SBC and Ameritech External Affairs functions.

1 **Q. HAVE YOU PREPARED A SCHEDULE THAT SUMMARIZES YOUR**
2 **EDUCATIONAL BACKGROUND AND WORK EXPERIENCES?**

3
4 A. Yes. I have prepared and attached to my testimony as Schedule 1, a summary of my
5 educational background and work experiences. Schedule 1 also includes a listing of cases
6 where I have filed testimony and/or appeared as a witness before Federal and State regulatory
7 and judicial bodies.

8
9 **Q. WHAT ARE YOUR CURRENT AND PAST WORK EXPERIENCES THAT ARE**
10 **RELEVANT TO THIS PROCEEDING?**

11
12 A. In late 1995, in anticipation of passage of the Telecommunications Act of 1996 ("the Act"),
13 the Company established various work groups to develop plans and procedures that would
14 allow the Company to comply with the anticipated provisions of the Act. As part of that
15 effort, I was responsible for developing the rates, terms and conditions and the Company's
16 negotiating position with respect to the transport and termination of traffic exchanged
17 between the Company's network and the networks of Competitive Local Exchange Carriers
18 ("CLECs").

19
20 During 1996, I was responsible for negotiating, on behalf of the Company, the transport and
21 termination of traffic portions of interconnection agreements with various CLECs. In
22 particular, I was responsible for negotiating the transport and termination of traffic provisions
23 of the interconnection agreement between SWBT and MFS Communications Company, Inc.

1 ("MFS"), hereinafter, the MFS Interconnection Agreement.¹ My specific area of
2 responsibility included negotiating the rates, terms and conditions applicable to intercompany
3 compensation for the exchange of traffic; i.e. reciprocal compensation, for all traffic
4 including "Local Traffic" as defined in the interconnection agreement between SWBT and
5 MFS.

6
7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8
9 A. The purpose of my testimony is to explain the position taken by SWBT with respect to
10 reciprocal compensation during the negotiations between SWBT and MFS that eventually
11 culminated in the signing of the Interconnection Agreement.

12
13 **Q. DURING THE NEGOTIATING SESSIONS BETWEEN SWBT AND MFS, WHAT**
14 **WAS SWBT'S POSITION WITH RESPECT TO THE ISSUE OF RECIPROCAL**
15 **COMPENSATION?**

16
17 During the negotiating sessions between SWBT and all CLECs, including MFS, SWBT's
18 position with respect to the issue of reciprocal compensation was, and continues to be, that
19 such compensation is only applicable to traffic that originates and terminates within the same
20 local calling area. SWBT's position was, and is, the same as that reflected in the Federal
21 Communications Commission's ("FCC") First Report and Order in CC Docket No. 96-98

¹ Interconnection Agreement Under Sections 251 and 252 Of The Telecommunications Act of 1996 Dated as of July 16, 1996 by and between Southwestern Bell Telephone Company and MFS Communications Company, Inc.

1 (hereinafter, "the FCC Order"). Although the FCC Order was not issued until August 1996,
2 SWBT participated extensively in the FCC's comment process and SWBT's comments to the
3 FCC were consistent with the FCC's decision on this issue. The FCC Order concluded that
4 the Section 251(b)(5) reciprocal compensation obligations, set forth in the Act, should apply
5 only to traffic that originates and terminates within a local area and not to interstate or
6 intrastate interexchange traffic. The FCC's conclusions in that regard are found at ¶1034 of
7 its Order, which reads, in part, as follows:

8
9 ¶1034. We conclude that section 251(b)(5) reciprocal compensation obligations
10 should apply only to traffic that originates and terminates within a local area, as
11 defined in the following paragraph We note that our conclusion that long
12 distance traffic is not subject to the transport and termination provisions of section
13 251 does not in any way disrupt the ability of IXC's to terminate their interstate
14 long-distance traffic on LEC networks We find that the reciprocal
15 compensation provisions of section 251(b)(5) do not apply to the transport and
16 termination of interstate or intrastate interexchange traffic.

17
18 Further, with the exception of traffic to and from a Commercial Mobile Radio Service
19 network, the FCC Order left to the state commissions the determination of the geographic
20 areas that should be considered "local areas" for the purpose of applying reciprocal
21 compensation for the transport and termination of traffic. (FCC Order at Par. 1035). The
22 FCC Order stated that such "local areas" should be consistent with the state commission's
23 historical practice of defining local service areas for wireline Local Exchange Carriers

1 ("LECs"). The FCC also concluded that traffic originating or terminating outside of the
2 applicable local service areas defined by the state commissions would be subject to interstate
3 and intrastate access charges.
4

5 **DID MFS AGREE WITH SWBT'S POSITION THAT RECIPROCAL**
6 **COMPENSATION BETWEEN THE PARTIES WAS APPLICABLE ONLY TO CALLS**
7 **THAT ORIGINATE AND TERMINATE WITHIN A LOCAL CALLING AREA?**
8

9 A. Presumably so, since that is what MFS agreed to in the MFS Interconnection Agreement.

10 Paragraph 1.30 of the MFS Interconnection Agreement defines "Local Traffic," as follows:
11

12 ¶1.30 "Local Traffic," for purposes of intercompany compensation, means traffic
13 that originates and terminates between or among end users within a SWBT local
14 calling area as defined in SWBT tariffs and any successor tariffs, including
15 mandatory local calling scope arrangements but excluding Optional EAS areas.
16 Mandatory Local Calling Scope is an arrangement that requires end users to
17 subscribe to a local calling scope beyond their basic exchange serving area. In no
18 event shall the Local Traffic area for purposes of local call termination billing
19 between the Parties be decreased during the Term of this Agreement.
20

21 **Q. DID MFS AND SWBT REACH AGREEMENT ON THE RECIPROCAL**
22 **COMPENSATION RATES THAT WOULD APPLY FOR THE TRANSPORT AND**
23 **TERMINATION OF LOCAL TRAFFIC?**

1 A. Yes. As stated in ¶5.3.2 of the MFS Interconnection Agreement, MFS and SWBT agreed to
2 “mutually and reciprocally compensate each other for the transport and termination of Local
3 Traffic at the rates provided in the Pricing Schedule.” In addition, as stated in ¶5.3.3 of the
4 MFS Interconnection Agreement, the Parties agreed to “mutually and reciprocally
5 compensate each other for the transport and termination of Optional EAS Traffic at the rates
6 provided in the Pricing Schedule.” The Pricing Schedule was attached to and made a part of
7 the MFS Interconnection Agreement.

8
9 **Q. DID MFS AND SWBT NEGOTIATE AND EVENTUALLY REACH AGREEMENT**
10 **ON THE COMPENSATION ARRANGEMENT THAT WOULD BE APPLICABLE**
11 **TO OTHER THAN “LOCAL TRAFFIC” AND “OPTIONAL EAS TRAFFIC?”**
12

13 A. Yes. MFS and SWBT reached agreement on the compensation arrangements that would be
14 applicable to IntraLATA Toll calls and to Switched Exchange Access Service.

15
16 With respect to IntraLATA Toll calls, the MFS Interconnection Agreement states, at ¶5.3.4,
17 as follows:

18
19 ¶ 5.3.4 The Reciprocal Compensation arrangements set forth in this Agreement
20 are not applicable to IntraLATA Toll calls. Each party shall bill the other Party
21 for transport and termination of such calls according to rates, terms, and
22 conditions contained in that Party’s effective Switched Access tariffs.

1 For Switched Exchange Access Service, the agreement reached between SWBT and MFS
2 is contained in ¶5.3.5 of the MFS Interconnection Agreement, which provides as follows:

3
4 ¶5.3.5 The Reciprocal Compensation arrangements set forth in this Agreement are
5 not applicable to Switched Exchange Access Service. Compensation for such
6 jointly provided services are set forth in Section 6.0 [of this Agreement] and shall
7 continue to be governed by the terms and conditions of the applicable federal and
8 state tariffs.

9
10 **Q. DURING SWBT'S NEGOTIATIONS WITH MFS, DID MFS INQUIRE AS TO HOW**
11 **ENHANCED SERVICE PROVIDER TRAFFIC WAS TO BE TREATED FOR**
12 **PURPOSES OF RECIPROCAL COMPENSATION BETWEEN THE PARTIES?**

13
14 A. No. During the negotiations between SWBT and MFS, which ultimately resulted in the MFS
15 Interconnection Agreement, neither party discussed how Enhanced Service Provider
16 (including Internet bound) traffic was to be treated for purposes of reciprocal compensation.

17
18 **Q. WHY DIDN'T SWBT RAISE THE ISSUE AS TO HOW ENHANCED SERVICE**
19 **PROVIDER TRAFFIC WAS TO BE TREATED FOR PURPOSES OF RECIPROCAL**
20 **COMPENSATION?**

21
22 A. SWBT did not raise the issue because it did not believe there was any uncertainty about the
23 "non-local" jurisdictional nature of Enhanced Service Provider traffic. MFS was an

1 established telecommunications carrier. SWBT had no reason to believe that MFS',
2 negotiating representatives did not have the same awareness of the existing FCC Orders
3 regarding the jurisdictional nature of Enhanced Service Provider traffic, as did SWBT's
4 negotiating representatives. Since the FCC had determined that Enhanced Service Provider
5 traffic was interstate, interexchange in nature, I did not believe it necessary to specifically
6 discuss how that traffic was to be treated for purposes of reciprocal compensation. Since the
7 MFS representatives did not raise the issue, I assume they had the same understanding.

8

9 **Q. AT THE TIME OF THE INTERCONNECTION NEGOTIATIONS BETWEEN**
10 **SWBT AND MFS, WHAT WAS YOUR UNDERSTANDING OF THE**
11 **JURISDICTIONAL NATURE OF ENHANCED SERVICE PROVIDER TRAFFIC?**

12

13 A. As SWBT's reciprocal compensation representative during the interconnections negotiations
14 with MFS, I was aware that prior FCC Orders and Rulings dating back to 1983 clearly stated
15 that Enhanced Service Provider traffic, including Internet Service Provider traffic, was
16 interstate, interexchange in nature.² I was also aware that while the FCC had determined that
17 interstate Switched Access Service rates were applicable to Enhanced Service Provider
18 traffic, it had exempted Enhanced Service Providers from paying Switched Access Service
19 rates for the origination and termination of traffic. In those earlier Orders and Rulings, the
20 FCC had determined that, in lieu of Switched Access Service rates, Enhanced Service

² See e.g. *MTS and WATS Market Structure*, CC Docket No. 78-72, Memorandum Opinion and Order, 97 FCC 2nd 682, 711 (1983) (*MTS/WATS Market Structure Order*); see also *Amendments of Part 69 of the Commission's Rules Relating to Enhanced Service Providers*, CC Docket No. 87-215, Order, 3 FCC Rcd 2631 (1988) (*ESP Exemption Order*).

1 Providers would pay equivalent local exchange service rates for the connections used to
2 originate and terminate their interstate, interexchange traffic. However, in determining the
3 rate levels that would be paid by Enhanced Service Providers, the FCC did not change its
4 position with respect to the interstate, interexchange nature of such traffic. If the FCC had
5 changed its position as to the interstate, interexchange nature of Enhanced Service Provider
6 traffic, that it would not then have had the regulatory authority to establish rates for that
7 traffic.

8
9 **Q. UNDER THE MFS INTERCONNECTION AGREEMENT NEGOTIATED**
10 **BETWEEN SWBT AND MFS, WHAT WAS YOUR UNDERSTANDING OF THE**
11 **RECIPROCAL COMPENSATION ARRANGEMENT THAT WOULD BE**
12 **APPLICABLE TO ENHANCED SERVICE PROVIDER TRAFFIC?**

13
14 A. Based on existing FCC Orders, it was my understanding, as SWBT's negotiator for
15 compensation issues, that Enhanced Service Provider traffic was unquestionably interstate,
16 interexchange in nature. Furthermore, it was my understanding that the compensation
17 arrangement applicable to such traffic would be the same Switched Exchange Access Service
18 compensation arrangement applicable under the MFS Interconnection Agreement to all other
19 interstate, interexchange traffic. I did not believe the issue needed discussion or clarification.
20
21 Specifically, it was my understanding that Enhanced Service Provider traffic would be
22 treated as Switched Exchange Access Service and that compensation for such traffic would
23 be treated in accordance with ¶5.3.5 of the MFS Interconnection Agreement as follows:

¶5.3.5 The Reciprocal Compensation arrangements set forth in this Agreement are not applicable to Switched Exchange Access Service. Compensation for such jointly provided services are set forth in Section 6.0 [of this Agreement] and shall continue to be governed by the terms and conditions of the applicable federal and state tariffs.

Q. DID THE MFS NEGOTIATORS EVER STATE OR SUGGEST THAT ENHANCED SERVICE PROVIDER TRAFFIC SHOULD BE CHARACTERIZED AS “LOCAL TRAFFIC” FOR PURPOSES OF COMPENSATION UNDER THE INTERCONNECTION AGREEMENT?

A. No. MFS’ negotiators did not suggest or state that the parties should agree to characterize Enhanced Service Provider traffic as “local traffic” for purposes of compensation under the Interconnection Agreement.

Q. WOULD SWBT HAVE VOLUNTARILY ENTERED INTO AN INTERCONNECTION AGREEMENT WITH MFS THAT REQUIRED ENHANCED SERVICE PROVIDER TRAFFIC TO BE TREATED AS “LOCAL TRAFFIC” FOR PURPOSES OF RECIPROCAL COMPENSATION?

A. No. If MFS had taken the position during the interconnection negotiations with SWBT that Enhanced Service Provider traffic should be treated as “Local Traffic” for purposes of reciprocal compensation, I would not have agreed on behalf of SWBT to include such a provision in the interconnection agreement. If MFS had demanded such a reclassification of

1 Enhanced Service Provider traffic, SWBT would not have agreed and, if MFS wanted to
2 arbitrate that issue, it certainly could have done so. The Company's position in that
3 arbitration would have been that Enhanced Service Provider traffic, which includes Internet
4 Service Provider traffic, is interstate, interexchange traffic subject to the jurisdiction of the
5 FCC - - not "Local Traffic," and that the compensation for interstate, interexchange traffic is
6 governed by the terms and conditions of the applicable federal and state tariffs.

7

8 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

9

10 **A. Yes it does.**

EDUCATIONAL BACKGROUND, WORK EXPERIENCE,
TESTIMONY AND WITNESS APPEARANCES OF
EUGENE F. SPRINGFIELD

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I have a Bachelor of Business Administration degree with a major in Marketing from Baylor University, Waco, Texas.

Q. PLEASE OUTLINE YOUR WORK EXPERIENCE WITH SOUTHWESTERN BELL TELEPHONE COMPANY.

A. I was employed by Southwestern Bell Telephone Company ("the Company") in 1967. Since that time, I have been continuously employed by the Company and have held various management positions in the Commercial Department, the Revenues and Public Affairs Department, and the External Affairs Department. From February 1976 to September 1991, I was responsible for the development, filing and administration of all the Company's Local, Toll and Access tariffs in Texas. In September 1991, I was transferred to St. Louis and became responsible for Access Service policy and planning for the Company. In January 1992, my job responsibilities changed and I became responsible for developing tariff filing packages and coordinating state regulatory and public affairs matters for all of the Company's state jurisdictions. In November 1997, I (together with my entire organization) was transferred to San Antonio, Texas, where I continued to be responsible for developing tariff filing packages and coordinating state regulatory and public affairs matters for all the Company's state jurisdictions. Beginning January 2000, my job responsibilities changed as a result of the restructuring of the External Affairs department in connection with the SBC/Ameritech Merger, and I became responsible for insuring internal compliance with the plan developed by the External Affairs department to consolidate SBC and Ameritech External Affairs

functions. Since 1970, all of my work experience with the Company has been related to regulatory, rate and tariff matters.

Q. HAVE YOU PREVIOUSLY APPEARED AS A WITNESS BEFORE A REGULATORY BODY?

A. Yes. The cases where I have filed direct testimony and/or appeared before regulatory and judicial bodies are listed below:

<u>YEAR</u>	<u>DESCRIPTION</u>
1996	Petition by AT&T Communications of the Southwest, Inc. for Compulsory Arbitration of Unresolved Issues With Southwestern Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996--Before the Kansas Corporation Commission--Docket No. 97-AT&T-20-ARB--Rate and Policy Matters Related to Unbundled Network Elements and Transport and Termination of Local Traffic.
1996	In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Arbitration of Unresolved Issues With Southwestern Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996--Before the Arkansas Public Service Commission--Docket No. 96-395-U--Rate and Policy Matters Related to Unbundled Network Elements and Transport and Termination of Local Traffic.
1996	In the Matter of Sprint Communications Company L.P.'s Petition for Arbitration of Interconnection Rates, Terms, Conditions and Related Arrangements with Southwestern Bell Telephone Company--Before the Kansas Corporation Commission--Docket No. 97-SCCC-167-ARB--Rate and Policy Matters Related to Unbundled Network Elements and Transport and Termination of Local Traffic.
1996	Application of AT&T Communications of the Southwest, Inc. For Compulsory Arbitration of Unresolved Issues With Southwestern Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996--Before the Oklahoma Corporation Commission--Cause No. PUD 960000218--Rate and Policy Matters Related to Unbundled Network Elements and Transport and Termination of Local Traffic.
1996	Deposition-- PUCofTexas--Consolidated Docket Nos. 16189,16196,16226, 16285 and 16290--Rate and Policy Matters related to Resale.

- 1996 Applications of AT&T Communications of the Southwest, Inc., American Communications Services, Inc. and its local operating subsidiaries, Teleport Communications Group, Inc. MCI Telecommunications Corp. and its affiliate MCImetro Access Transmission Services, Inc., and MFS Communication Company, Inc. for Arbitration pursuant to Section 252(b) of the Telecommunications Act of 1996-- Before the Public Utility Commission of Texas—Consolidated Docket Nos. 16189, 16196, 16226, 16285 and 16290--Rate and Policy Matters related to Resale.
- 1995 Application of MFS Intelenet of Texas, Inc. for a Certificate of Public Convenience and Necessity to Operate as a Local Exchange Company in the Areas Served by Southwestern Bell Telephone Company and GTE Southwest, Inc. in Harris, Dallas, Tarrant, Bexar, Travis, and El Paso Counties.—Before the Public Utility Commission of Texas—Docket No. 13282--Rate and Tariff Issues and Policy Matters.
- 1993 In the 56th Judicial District of Galveston County, Texas; Metro-Link Telecom, Inc., et al v. Southwestern Bell Telephone Company, et al—Testimony at Trial on Regulatory Policy, Cost and Tariff Matters.
- 1993 In the District Court of Travis County, Texas, 331st Judicial District, Southwestern Bell Telephone Company v. Public Utility Commission of Texas Regarding Subst. Rule 23.61 - Local Exchange Service and 23.27 - Competitive Service—Affidavit on Rate and Tariff Issues and Policy Matters. (Cause No. 92-16422)
- 1993 In the United States District Court for the Northern District of Texas, Dallas Division; Texas Municipalities/Southwestern Bell Telephone Company Fee Ordinance Litigation (MDL Docket No. 903) -- Deposition on Regulatory, Rate, Cost and Tariff Matters.
- 1993 Request of Southwestern Bell Telephone Company to Obsolete and Grandfather Centrex Services and Joint Application of the Parties to Determine if the Restrictions, Terms and Conditions Associated With the Sharing of Centrex and Plexar Services are Unreasonable as a Matter of Regulatory Policy or in Violation of any Law - Before the Public Utility Commission of Texas—Docket No. 11109 -- Rate and Tariff Issues and Policy Matters.
- 1992 In the 56th Judicial District of Galveston County, Texas; Metro-Link Telecom, Inc., et al v. Southwestern Bell Telephone Company, et al—Deposition on Regulatory, Policy, Cost and Rate and Tariff Matters. (Cause No. 89-CU-0204)

- 1992 Application of Southwestern Bell Telephone Company for Approval of Calculation of House Bill 11 Adjustment Factors for 1992 Pursuant to PUC Subst. R. 23-21 (d) - Before the Public Utility Commission of Texas—Docket No. 10821 -- Rate and Tariff Matters and Policy Issues and the Stipulation in Docket No. 8585.
- 1992 Complaint of DFW Metro Line Service, Against Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No 9090 -- Deposition on Rate and Tariff Matters.
- 1991 Southwestern Bell Telephone Company - Application to Approve Deletion of the Carrier Common Line and Interexchange Carrier Access Charge Credits - Before the Public Utility Commission of Texas—Docket No. 10463 -- Deposition on Rate and Tariff Matters.
- 1991 Southwestern Bell Telephone Company - Statement of Intent and Application to Change and Restructure the Rates for Directory Assistance Call Completion Service - Application to Introduce Multiple List Directory Assistance Service—Before the Public Utility Commission of Texas—Consolidated Docket Nos. 10381/10123/10122 -- Rate and Tariff Matters and Policy Issues.
- 1991 Southwestern Bell Telephone Company - Statement of Intent and Application to Change and Restructure the Rates for Custom Calling Service for Residence Customers - Before the Public Utility Commission of Texas—Docket No. 10382 - - Rate and Tariff Matters and Policy Issues.
- 1991 Southwestern Bell Telephone Company - Statement of Intent and Application to Change and Restructure the Rates for Custom Calling Services - Before the Public Utility Commission of Texas—Docket No. 10382 in Support of Interim Rates on Rate and Tariff Matters.
- 1991 Southwestern Bell Telephone Company - Statement of Intent and Application to Change and Restructure the Rates for Directory Assistance Service - Before the Public Utility Commission of Texas—Docket No. 10381 in Support of Interim Rates on Rate and Tariff Matters.
- 1990 Inquiry of the General Counsel of the Public Utility Commission of Texas into the Reasonableness of the Rates and Services of Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 8585 in Support of the Stipulation and Agreement on Rate and Tariff Matters.

- 1989 Petition for Declaratory Judgment and Relief of AT&T Communications of the Southwest, Inc. against Southwestern Bell Telephone Company in Connection with TEXAN II Service to the State of Texas - Before the Public Utility Commission of Texas—Docket No 8395 -- Rate and Tariff Matters.
- 1989 Inquiry of the General Counsel into the WATS Prorate Credit - Before the Public Utility Commission of Texas—Docket No. 8218 Consolidated with Docket No. 8585 -- Rate and Tariff Matters.
- 1989 Inquiry of the General Counsel of the Public Utility Commission of Texas into the Reasonableness of the Rates and Services of Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 8585 on Rate and Tariff Matters.
- 1989 In the District Court of Travis County, Texas, 299th Judicial District, US Sprint Communications Company, MCI Telecommunications Corporation, AT&T Communications of the Southwest, Inc. v. Public Utility Commission of Texas, Cause No. 458.204 - Hearing on Complaint and Motion for Preliminary Injunction—Rate and Tariff Matters.
- 1988 Application of Southwestern Bell Telephone Company to Amend Access Service Tariff to Restrict Eligibility for WATS Resale Credits-Before the Public Utility Commission of Texas—Docket No. 8438, Affidavit on Rate and Tariff Matters and Policy Issues.
- 1988 Inquiry into IntraLATA WATS Competition on Multijurisdictional WATS Access Lines - Before the Public Utility Commission of Texas—Docket No. 7330 on Rate and Tariff Matters.
- 1988 Application of Southwestern Bell Telephone Company for Revisions to the Company's Information Delivery Service - DIAL 976 Tariff-Before the Public Utility Commission of Texas—Docket No. 8030 -- Rate Policy Issues.
- 1988 Deposition - In the United States District Court for the Southern District of Texas, Houston Division, Nicholas Gold, Inc. v. Southwestern Bell Telephone Company, Civil Action No. A-88-0172 on Rate and Tariff Matters.
- 1988 In the United States District Court for the Southern District of Texas, Houston Division, Nicholas Gold, Inc. v. Southwestern Bell Telephone Company - Hearing on Request for Preliminary Injunction - Rate and Tariff Matters.
- 1987 Application of Southwestern Bell Telephone Company for Authority to Implement Rates and Regulations for Intrastate Interim 800 Service - Before the Public Utility Commission of Texas - Docket No. 7614 on Rate and Tariff Matters.

- 1987 Omniphone Inc., et al. v. Southwestern Bell Telephone Company, et al. Certification of Facts set Forth in "Response to Southwestern Bell Telephone Company to Relators' Petition for Writ of Injunction and Motion for Leave to File" - Before the Court of Appeals for the Third Supreme Judicial District of Texas at Austin—CV-21662.
- 1987 Complaint of Metro-Net, Inc. Against Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 7438 on Rate and Tariff Matters.
- 1987 Complaint of DIAL 976 Information Providers Against Southwestern Bell Telephone Company and Petition for Stay of Threatened Disconnection - Before the Public Utility Commission of Texas—Docket Nos. 7358 and 7385 on Rate and Tariff Matters.
- 1987 Deposition - Docket No. 7286 -- Application of Texas On Line Company for Determination of Correct Rates to be Charged by Kerrville Telephone Company on Rate and Tariff Issues.
- 1987 Deposition - Docket Nos. 7122, 7123, 7124, and 7152 -- Complaint of Intellicall, et al, Against Southwestern Bell Telephone Company Private Coin Phone Rates and Practices—Rate and Tariff Issues.
- 1987 Southwestern Bell Telephone Company Tariff Filing to Amend Information Delivery Service, DIAL 976 - Before the Public Utility Commission of Texas—Docket No. 7423 on Rate and Tariff Matters.
- 1987 Application of Southwestern Bell Telephone Company for Authority to Implement Rates and Regulations for Intrastate Interim 800 Service - Before the Public Utility Commission of Texas - Docket No.7160 on Rate and Tariff Matters.
- 1986 Inquiry into Southwestern Bell Telephone Company's ESSX-Custom Tariff - Before the Public Utility Commission of Texas—Docket No. 6771 on Rate and Tariff Matters.
- 1986 Southwestern Bell Telephone Company Tariff Filing to Introduce Information Delivery Service - DIAL 976 - Before the Public Utility Commission of Texas—Docket No. 6689 on Rate and Tariff Matters.
- 1986 Request for Declassification of Documents Covered by the Protective Order Entered in Docket No. 6200 - Before the Public Utility Commission of Texas—Docket No. 6588 on Matters Relating to Confidential Information.

- 1985 Inquiry into Alleged Violations of Protective Order Issued in Docket No. 6200 - Before the Public Utility Commission of Texas—Docket No. 6541 on Matters Relating to Confidential Information.
- 1985 Southwestern Bell Telephone Company Filing to Introduce BELLBOY Personal Signaling Service in Amarillo, Corpus Christi, Lubbock, and San Antonio - Before the Public Utility Commission of Texas—Docket No. 6252 on Rate and Tariff Matters.
- 1985 Southwestern Bell Telephone Company Petition for General Rate Change - Before the Public Utility Commission of Texas—Docket No. 6200 on Rate and Tariff Matters.
- 1985 Southwestern Bell Telephone Company Petition for General Rate Change - Before the Public Utility Commission of Texas—Docket No. 6200 on Revenue Requirement Matters.
- 1985 Deposition - Docket No. 6200 -- Southwestern Bell Telephone Company Rate Case - Rate and Tariff Issues.
- 1985 Southwestern Bell Telephone Company Filing to Introduce ESSX-400 Service - Before the Public Utility Commission of Texas—Docket No. 6146 on Rate and Tariff Matters.
- 1985 Southwestern Bell Telephone Company Filing to Clarify Equal Access Prorate Provisions - Before the Public Utility Commission of Texas—Docket No. 6180 on Rate and Tariff Matters.
- 1985 Southwestern Bell Telephone Company Application for Tariff Change Concerning the Provision of On-Premise Private Line Service - Before the Public Utility Commission of Texas—Docket No. 6015 on Rate and Tariff Matters.
- 1984 Southwestern Bell Telephone Company Petition for IntraLATA FX Rate Change - Before the Public Utility Commission of Texas—Docket No. 5891 on Rate and Tariff Matters.
- 1983 Southwestern Bell Telephone Company for General Rate Change - Before the Public Utility Commission of Texas - Docket No. 5220 on Rate and Tariff Matters.
- 1983 Deposition - Docket No. 5220 -- Southwestern Bell Telephone Company Rate Case - Rate and Tariff Issues.

- 1983 Petition of the Public Utility Commission of Texas for an Inquiry Concerning the Effects of the MFJ and the Access Charge Order from Southwestern Bell Telephone Company and the Independent Telephone Companies of Texas - Before the Public Utility Commission of Texas—Docket No. 5113 on Rate and Tariff Matters.
- 1983 Petition of Southwestern Bell Telephone Company for Approval of Tariffs to Allow Customers to Install and Maintain Inside Premises Station Wire - Before the Public Utility Commission of Texas - Docket No. 5141 on Rate and Tariff Matters.
- 1983 Petition of Southwestern Bell Telephone Company for Approval of Tariffs to Establish Charging to Owners of Complex Systems for Use of Company Owned Inside Premises Wire - Before the Public Utility Commission of Texas—Docket No. 5420 on Rate and Tariff Matters.
- 1982 Complaint Petition of U.S. Telephone, Inc. for Relief Against Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 4619 on Rate and Tariff Matters.
- 1982 Complaint of AMTEL Communications, Inc., et al, as to Rates, Charges and Practices of Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 4521 on Rate and Tariff Matters.
- 1982 Southwestern Bell Telephone Company Petition for General Rate Change - Before the Public Utility Commission of Texas—Docket No. 4545 on Rate and Tariff Matters.
- 1982 Deposition - Docket No. 4545 -- Southwestern Bell Telephone Company Rate Case - Rate and Tariff Issues.
- 1982 Petition of General Telephone Company of the Southwest to Amend the Division of Toll Revenues Agreement with Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 3957 on Toll Rate and Revenue Effect Matters.
- 1982 Southwestern Bell Telephone Company Petition for General Rate Change - Before the Public Utility Commission of Texas—Docket No. 3920 on Rate and Tariff Matters.
- 1981 Deposition - Docket No. 3920 -- Southwestern Bell Telephone Company Rate Case - Rate and Tariff Issues.
- 1980 Complaint of Sam San Marco as to Rates, Charges and Practices of Southwestern Bell Telephone Company - Before the Public Utility Commission of Texas—Docket No. 3133 on Rate and Tariff Matters.

1980 Southwestern Bell Telephone Company Petition for General Rate Change -
Before the Public Utility Commission of Texas - Docket No. 3340 on Rate and
Tariff Matters.