

Exhibit No. _____
Issues: Determination of Statewide
Competition, Determination of
Exchange Specific Competition
Witness: Adam McKinnie
Sponsoring Party: MO PSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: IO-2003-0281
Date Testimony Prepared: July 3, 2003

**MISSOURI PUBLIC SERVICE COMMISSION
UTILITY OPERATIONS DIVISION**

**SURREBUTTAL TESTIMONY
OF**

ADAM MCKINNIE

FILED

AUG 06 2003

**Missouri Public
Service Commission**

CASE NO. IO-2003-0281

**Jefferson City, Missouri
July 2003**

Exhibit No. 7
Case No(s) IO-2003-0281
Date 7-14-03 **Prtr 11**

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter Of Investigation Of The State)
Of Competition In The Exchanges Of Sprint)
Missouri, Inc.)

Case No. IO-2003-0281

AFFIDAVIT OF ADAM MCKINNIE

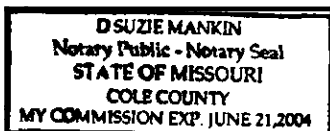
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Adam McKinnie, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 9 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

Adam McKinnie

Adam McKinnie

Subscribed and sworn to before me this 3rd day of July 2003.



Suzie Mankin

Notary Public

My commission expires

June 21, 2004

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **ADAM MCKINNIE**

4 **SPRINT MISSOURI, INC.**

5 **CASE NO. IO-2003-0281**
6
7
8

9 Q. Are you the same Adam McKinnie who filed Rebuttal Testimony?

10 A. Yes.
11

12 Q. What is the purpose of your Surrebuttal Testimony?
13

14 A. The purpose of my Surrebuttal Testimony is to respond to the Rebuttal Testimony
15 of Office of Public Counsel witness Meisenheimer, Fidelity Communications Services I, Inc.
16 (Fidelity) witness Taylor and ExOp of Missouri, Inc.d/b/a Unite (ExOp) witness Devoy.
17

18 Q. On page 5, lines 8-11 of her Rebuttal Testimony, Ms. Meisenheimer states, "[t]he
19 Commission should consider taking this opportunity to determine that effective competition does
20 not exist for those services and in those exchanges that Sprint [Sprint Missouri, Inc. (Sprint)]
21 does not seek competitive classification at this time." Do you agree with this statement?

22 A. Yes. As Section 392.254.5 RSMo states,
23

24 Each telecommunications service of an incumbent local exchange
25 telecommunications company [ILEC] shall be classified as competitive in
26 any exchange in which at least one alternative local exchange
27 telecommunications company has been certified under section 392.455
28 and has provided basic local telecommunications service in that exchange
29 for at least five years, unless the commission determines, after notice and a
30 hearing, that effective competition does not exist in the exchange for such
31 service.
32

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1 Therefore, Staff recommends the Commission state in its Order that effective competition
2 does not exist for those services and in those exchanges where Sprint does not seek effective
3 competition.

4 Q. Beginning on page 4, line 4 of her Rebuttal Testimony, Ms. Meisenheimer
5 implies effective competition has to be examined service by service, exchange by exchange.
6 How has the Commission chosen to look at effective competition in the past?

7 A. Although Section 392.245.5 RSMo seems to contemplate a review as described
8 by Ms. Meisenheimer, in Case No. TO-2001-467, the Southwestern Bell Telephone Company
9 (SWBT) competition case (SWBT Competition Case), the Commission chose to consider all of
10 the Southwestern Bell's services and exchanges simultaneously. In its Order, the Commission
11 states, "Because alternative local exchange telecommunications companies are currently certified
12 in every exchange in which Southwestern Bell operates, the Commission established this case to
13 review the status of competition in all of Southwestern Bell's exchanges." (Page 5) According to
14 Schedule 1, three facilities-based competitive local exchange telecommunications carriers
15 (CLECs) (Everest Midwest Licensee, L.L.C. f/k/a Everest Connections Corporation, Navigator
16 Telecommunications, L.L.C., and Socket Telecom, L.L.C.) are certificated to provide service
17 throughout Sprint's entire service area. Furthermore, one non-prepaid reseller (Local Line
18 America, Inc.) and a few prepaid resellers are also certificated to provide service throughout the
19 Sprint service area. As this situation is similar to what the Commission cited in the SWBT
20 Competition Case, it makes sense to look at all of Sprint's exchanges at the same time.

21 The alternative would be to have a 'rolling' case of sorts, where the Commission would
22 consider new services and/or new exchanges on a perpetual basis. It is a much more efficient

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1 and logical use of the resources for all parties to consider all of the exchanges and services of a
2 large telecommunications company (such as SWBT or Sprint) at the same time.

3 Q. On page 17, lines 10-15 of her Rebuttal Testimony, Ms. Meisenheimer discusses
4 using the Herfindahl-Hirschman Index (HHI) to look at market dominance. Is the HHI an
5 appropriate indicator of the status of effective competition in the telecommunications industry in
6 this case?

7 A. No. Use of the HHI is not appropriate in this case. As Ms. Meisenheimer states,
8 the HHI takes into account the number of firms and their individual market shares to create one
9 number that is intended to represent market concentration (page 17, lines 13-14, Meisenheimer's
10 Rebuttal Testimony). As discussed below, there are several problems with evaluating the
11 telecommunications market on an exchange-by-exchange basis and then comparing the results to
12 industries other than telecommunications.

13 First, the telecommunications market is a unique entity. The cost of producing just one
14 full facilities-based telephone line would include, but is not limited to, providing central office
15 equipment, physically providing some sort of access to the customer's premise, providing
16 customer support, establishing interconnection with other telecommunications companies, etc.
17 As the cost of entry is capital intensive, it is not likely that a large number of companies will be
18 providing full facilities-based telephone service in any one exchange.

19 Two of the three CLECs (Fidelity and Unite) we are examining in depth in this
20 proceeding are providing telephone service using some of the same facilities they also use to
21 simultaneously provide cable television service. Some of these facilities were already in place
22 prior to offering telephone service, thus mitigating some of the initial cost of providing that

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1 service. The third company (Green Hills Telecommunications Company) is providing service
2 utilizing the expertise and facilities of an affiliated ILEC.

3 Second, the customer base in many of these exchanges is of a size that it would seem
4 unlikely that a large number of facilities-based telecommunications carriers would invest the
5 large amount of capital needed to compete over them. For example, as of December 2001, there
6 were 104 facilities-based business lines and 469 facilities-based residential lines in the Norborne
7 exchange. Taking into account the large entry cost of providing telecommunications service, it is
8 unlikely that a large number of facilities-based competitors would enter this market.

9 Third, it would be remarkable for five firms to achieve an equal market share where an
10 incumbent has been in place for a long period of time, yet even this scenario would not meet
11 Ms. Meisenheimer's standard of a market being "moderately concentrated." For example, five
12 telephone companies each providing service to 20 percent of the market within an exchange
13 would result in an HHI as follows:

$$\begin{aligned} &20^2 + 20^2 + 20^2 + 20^2 + 20^2 \\ &400 + 400 + 400 + 400 + 400 = 2000 \end{aligned}$$

14
15
16
17 For the Norborne exchange, this would translate to five carriers with approximately 116
18 lines per carrier. To satisfy the definition of "moderately concentrated," the telecommunications
19 market in this exchange would need a minimum of six carriers with similar market shares to have
20 an HHI of 1800.

21 Furthermore, the HHI does not take into account the difference between an incumbent
22 firm and a competitive firm. The HHI considers all competitors as equal and does not take into
23 account the historic advantages of the ILEC, such as the ability to cultivate long-term
24 relationships with customers and being well-known. A CLEC can be seen as "swimming

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1 upstream", as it has to compete against the historical incumbent for customers that the ILEC may
2 have served for decades.

3 Considering the high cost of entry borne by competitive facilities-based carriers, the
4 manner in which the HHI treats the incumbent and competitive companies as the same, and the
5 unrealistic expectations this standard has for the telecommunications market within any
6 exchange, Staff does not find the HHI a valuable tool to use in determining effective
7 competition.

8 Q. On page 3, lines 55-56 of his Rebuttal Testimony, Mr. Taylor states Fidelity is not
9 a "100 percent full facilities based competitor." Ms. Meisenheimer, on page 13, lines 8-11, of
10 her Rebuttal Testimony, states, in reference to the Fidelity exchanges, "[Sprint] still controls the
11 local loop and customers are still captive to [Sprint] or a CLEC that purchases resold services or
12 unbundled network elements from Sprint." Do you agree with these characterizations of Fidelity
13 within the Rolla exchange?

14 A. No. While it is true that Fidelity does not provide 100 percent of their lines using
15 entirely their own facilities, according to a Data Request Response received by Staff from
16 Fidelity, as of December 31st, 2002, in the Rolla exchange, Fidelity had 2,805 full facilities-
17 based residential voice grade equivalent lines; 1,633 full facilities-based business voice grade
18 equivalent lines; three pure resale business voice grade equivalent lines; and six Unbundled
19 Network Element (UNE) voice grade equivalent lines.

20 Staff agrees that Fidelity cannot currently reach all customers in the Rolla exchange using
21 its own facilities. However, Staff considers the 2,805 residential customers and 1,633 business
22 customers as full facilities-based customers. The 99.8 percent of the lines listed by Fidelity as
23 "full facilities-based" are presumably provided using 100 percent Fidelity owned and controlled

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1 equipment, including the local loop; thus, those customers would not be captive to Sprint and
2 Sprint would not control those local loops.

3 Q. Beginning on page 4, line 19 of his Rebuttal Testimony, Mr. Devoy discusses the
4 increase of Sprint rates in rate Group III. Do you have any comments about this analysis?

5 A. Yes. When Sprint submitted Tariff File No. 200100493 to the Commission on
6 October 27, 2000, to rebalance rates, it eliminated many separate touch tone and zone mileage
7 charges and rolled them all into the basic rate. Furthermore, Sprint reduced switched access
8 charges and increased basic local service rates as allowed by Section 392.245.9 RSMo.

9 The Staff Recommendation characterized the impact as follows:

10 For all residential basic local customers:

- 11
- 12 ▪ 27 percent will receive a monthly savings of 40 cents;
- 13
- 14 ▪ 58 percent will see an average increase of \$1.04 in their monthly
- 15 dial tone service;
- 16
- 17 ▪ 15 percent will see a \$3.20 increase in their monthly dial tone
- 18 service.
- 19

20 As a result of adjustments allowed by Section 392.245.4(1) RSMo and Section 392.245.9
21 RSMo, Sprint also increased the basic local rates by \$1.40 for residential and \$1.36 for business
22 in December 2001; and increased the basic local rates for residential \$1.50 and business \$1.50 in
23 December 2002. Clearly, Sprint's price increases since 1999 have not been as dramatic as stated
24 by Mr. Devoy.

25 Q. On page 3, lines 22-28 of his Rebuttal Testimony, Mr. Devoy discusses the
26 possible pending sale of ExOp by its parent company, Aquila, and the concerns about Aquila not
27 funding any future ExOp expansion. What is your opinion on this matter?

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1 A. The current state of competition in the Kearney exchange is sufficient for
2 effective competition. Nowhere in his testimony does Mr. Devoy contemplate ExOp's current
3 customers in the Kearney exchange being denied telecommunications service from ExOp or its
4 successor.

5 Q. On page 6, line 124 of his Rebuttal Testimony, Mr. Taylor states, "Only one
6 competitor price competes with Sprint." How do you respond to this statement?

7 A. Staff agrees with Mr. Taylor that only one company is capable of price competing
8 with Sprint in the Rolla exchange (Fidelity). Staff would like to add that Fidelity competes with
9 Sprint in the Rolla exchange on both a price and value basis, and a combination of those two
10 factors. Customers in the Rolla exchange have the choice to purchase their telecommunications
11 services from Sprint or Fidelity, and may choose so based on any number of factors, not just
12 price. Mr. Taylor provides excellent examples of how effective competition can and should
13 occur in the telecommunications industry, on page 8, lines 179-182 of his Rebuttal Testimony,
14 while discussing the St. Robert exchange. Mr. Taylor states, "The fact that its [Fidelity's]
15 affiliate, Fidelity Cablevision, Inc., had been providing cable TV service for approximately eight
16 years was its biggest advantage. It provided Fidelity I with name recognition and a positive
17 quality of service reputation in the community. The existence of a local business office and the
18 synergies available by developing a unique, multipurpose network were significant factors in
19 Rolla." The multipurpose network cited by Mr. Taylor has allowed Fidelity to differentiate itself
20 from Sprint by allowing Fidelity to offer a wide variety of services and to compete with Sprint
21 not just on price, but also on value.

22 Q. Ms. Meiseheimer and Mr. Devoy, in Rebuttal Testimony, express concerns as to
23 the sustainability of the CLECs relied upon as providing effective competition. If the

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Commission decides to declare an exchange effectively competitive, can the Commission in the future remove that declaration?

A. Yes. Section 392.245.5 RSMo states,

The Commission shall from time to time, but no less than every five years, review the state of competition in those exchanges where it has previously found the existence of effective competition, and if the Commission determines, after hearing, that effective competition no longer exists for the incumbent local exchange telecommunications company in such exchange, it shall reimpose upon the incumbent local exchange telecommunications company in such exchange, the provisions of paragraph (c) of subdivision (2) of subsection 4 of section 392.200 and the maximum allowable prices established by the provisions of subsections 4 and 11 of this section, and, in any such case, the maximum allowable prices established for the telecommunications services of such incumbent local exchange telecommunications company shall reflect all index adjustments which were or could have been filed from all preceding years since the company's maximum allowable prices were first adjusted pursuant to subsection 4 or 11 of this section.

Q. On page 5, lines 99-105 of his Rebuttal Testimony, Mr. Taylor states that in the SWBT Competition Case, the Commission found 51 CLECs were providing business service in the Kansas City exchange, 59 CLEC were providing business service in the St. Louis exchange, and 36 CLECs were providing business service in the Springfield exchange, while noting that competition in Rolla pales in comparison. Further, on page 20, lines 15-19 of her Rebuttal Testimony, Ms. Meisenheimer discusses the actual number of carriers providing service in Sprint's service territory. What is Staff's opinion on the number of CLECs cited as providing service in this case?

A. According to Section 386.020(13) RSMo, one of the factors in determining effective competition is "the extent to which the services of alternative providers are functionally equivalent or substitutable at comparable rates, terms and conditions." Thus, the focus of an effective competition case should be on whether the CLEC(s) are providing functionally

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1 equivalent or substitutable service in the exchange(s) of an ILEC, not the number of CLECs
2 providing service within an exchange.

3 Mr. Taylor notes on page 4, lines 75-76 of his Rebuttal Testimony that eight of the nine
4 CLECs (excluding Fidelity) listed in Sprint's Rolla phone book are prepaid. Ms. Meisenheimer
5 states on page 14, lines 3-9 of her rebuttal testimony that prepaid service is not functionally
6 equivalent to basic local telecommunications service. As noted in Staff's Rebuttal Testimony,
7 page 15, beginning on line 22, it is logical to remove those CLECs, or any other CLECs not
8 providing functionally equivalent or substitutable service, from the discussion of effective
9 competition and focus on facilities-based carriers.

10 Q. Please summarize your testimony.

11 A. Following is a list of the crucial aspects of my testimony:

- 12 • Staff recommends the Commission state in its order that effective competition
13 does not exist for those services and in those exchanges where Sprint does not
14 seek effective competition.
- 15
- 16 • Staff recommends the Commission consider competition for all requested
17 services in all requested exchanges at this time.
- 18
- 19 • The Herfindahl-Hirschman Index (HHI) is not appropriate in this case.
- 20
- 21 • The extent to which competitive services are functionally equivalent or
22 substitutable is a key component when considering the number of carriers
23 providing service in a given market.
- 24

25 Q. Does this end your Surrebuttal Testimony?

26 A. Yes, it does.

Missouri Competitive Basic Local Exchange Telephone Service Carriers (CLECs)

#	Company	Type	Telephone Number	Service Area
1	1-800-Reconex, Inc. (Formerly Sterling International Funding, Inc., d/b/a Reconex) P.O. Box 40 2500 Industrial Avenue Hubbard, OR 97032	Prepaid	Business and residential 800-275-8223 888-732-6639	All SWBT, all Sprint
2	AccuTel of Texas, Inc. 7900 John W. Carpenter Freeway Dallas, TX 75247	Prepaid	Business and residential 800-687-5700	All SWBT
3	Adelphia Business Solutions Operations, Inc. 121 Champion Way Canonsburg, PA 15317	f	Business only 888-743-2233	Kansas City Area
4	Allegiance Telecom of Missouri 1950 Stemmons Freeway, Suite 3026 Dallas, TX 75207-3118	f	Business only 214-261-8748	St. Louis metro
5	ALLTEL Communications, Inc. One ALLIED Drive P.O. Box 2177 Little Rock, AR 72203	f	Business and residential 800-501-1754	SWBT area of Springfield
6	American Communication Services of Kansas City, Inc. 131 National Business Parkway, Suite 100 Annapolis Junction, MD 20701	f	Business only	Kansas City Metropolitan Exchange: Principal zone, MCA-1 and MCA-2
7	AT&T Communications of the Southwest, Inc. 101 West McCarty, Suite 216 Jefferson City, MO 65101	f	Business only 800-264-0218	All SWBT
8	BarTel Communications, Inc. 333 Leffingwell, Suite 101 St. Louis, MO 63122	Prepaid	Business and residential 888-742-0055	All SWBT, all CenturyTel-MO, all CenturyTel
9	Big River Telephone Company, LLC 24 South Minnesota Cape Girardeau, MO 63072		Business and residential	All SWBT
10	Birch Telecom of Missouri, Inc. 2020 Baltimore Avenue Kansas City, MO 64108	f	Business only 888-772-4724 (888-77BIRCH)	All SWBT
*	BroadSpan Communications, Inc. see Mpower Communications Central Corp.			
11	Brooks Fiber Communications of Missouri, Inc. 701 Brazos, Suite 600 Austin, TX 78701	f	Business only Kansas City Metro (816)221-9050 Springfield Metro (417) 866-4442	SWBT areas of KC and Springfield metro
12	BTI (Business Telecom, Inc.) 4300 Six Forks Road, Suite 500 Raleigh, North Carolina 27609	f	Business and residential 919-510-7000	All SWBT
*	Business Telecom, Inc. See BTI			

#	Company	Type	Telephone Number	Service Area
13	Buy-Tel Communications, Inc. 6409 Colleyville Boulevard Colleyville, TX 76034	Prepaid	Residential only 800-583-8493	All SWBT, all CenturyTel- MO, all Sprint, all CenturyTel
14	Camarato Distributing, Inc. 900 Camarato Drive Herrin, Illinois 62948	Prepaid	Business and residential 877-639-7466	All SWBT, all CenturyTel- MO, all CenturyTel
15	CAT Communications International, Inc. 4142 Melrose Avenue, N.W., Unit #25, P.O. Box 6129 Roanoke, VA 24017	Prepaid	888-477-1224	All SWBT, all CenturyTel- MO, all CenturyTel
16	Cbeyond Communications, LLC 320 Interstate North Parkway, Suite 300 Atlanta, GA 30339		Business only 866-424-5100	SWBT areas of Kansas City and St. Louis
*	CCCMO, Inc. see Connect!			
17	Central Missouri Telecommunications, Inc. P.O. Box 596 Osage Beach, Missouri 65065		Business and residential	SWBT exchanges at Lake of the Ozarks
18	Charter Fiberlink - Missouri LLC 3660 South Geyer Rd. St. Louis, MO 63137	f Cable	Residential only 866-207-3663	Dardenne, Harvester, O'Fallon, St. Charles, St. Peters
*	Choctaw Communications, L.C. See Smoke Signal Communications			
19	Ciera Network Systems, Inc. 1250 Wood Branch Drive Houston, Texas 77079	Reseller and Prepaid	Business and residential 800-725-5575	All SWBT
*	Comm South Companies, Inc. See Missouri Comm South, Inc.			
*	Computer Business Sciences, Inc. See IG2, Inc.			
20	Connect! (CCCMO, Inc.) 124 West Capitol, Suite 250 Little Rock, AR 72201		Business and residential 877-200-5022	All SWBT
21	Delta Phones, Inc. 245 Illinois St., P.O. Box 784 Delhi, LA 71232	Prepaid	Business and residential 800-814-8623	All SWBT
22	DMJ Communications, Inc. 2525 North Grandview, Suite 900 Odessa, TX 79761	Prepaid	Business and residential 888-880-0348	All SWBT, all CenturyTel- MO, all CenturyTel
*	Dobson Wireless, Inc. See Logix Communications Corporation			
23	dPi-Teleconnect, L.L.C. 2997 LBJ Freeway, Suite 225 Dallas, TX 75234	Prepaid	Business and residential 800-687-6727	All SWBT
24	Ernest Communications, Inc. 6475 Jimmy Carter Blvd., Suite 300 Norcross, Ga 30071		Business and residential 800-456-8353	All SWBT
25	Everest Connections LLC (Everest Midwest Licensee, LLC f/k/a Everest Connections Corporation) 4740 Grand Avenue, Suite 200 Kansas City, MO 64112	f	Business and residential 877-553-4655	All SWBT, all CenturyTel- MO, all Sprint, all CenturyTel

#	Company	Type	Telephone Number	Service Area
*	Everest Midwest Licensee, LLC f/k/a Everest Connections Corporation See Everest Connections LLC			
26	ExOp of Missouri, Inc. 303 North Jefferson, P.O. Box 891 Kearney, MO 64060	f	Business and residential 816-903-3967	Sprint exchanges of Kearney and Platt City
27	EZ Talk Communications, L.L.C. 4727 South Main Stafford, TX 74777	Prepaid	Business and residential 800-804-6880	All SWBT
28	FamilyTel of Missouri L.L.C. 2900 Louisville Avenue Monroe, LA 71201	Prepaid	Residential 318-329-8159	All SWBT
*	Fast Connections, Inc. See 1-800-Reconex, Inc.			
*	Feist Long Distance Service, Inc. See Ionex Communications, Inc.			
29	Fidelity Communications Services I, Inc. 64 North Clark Street Sullivan, MO 63080	f	Business and residential 800-392-8070	Rolla and Newburg Exchanges (Sprint)
30	Fidelity Communications Services II, Inc. 64 North Clark Street Sullivan, MO 63080	f	Business and residential 800-392-8070	CenturyTel-MO Exchanges of Belle, Bland, Bourbon, Cuba, St. James
*	Frontier Local Services, Inc. See Global Crossing Local Services, Inc.			
*	Frontier Telemanagement, Inc. See Global Crossing Telemanagement, Inc.			
*	Gabriel Communications of Missouri, Inc. See NuVox Communications of Missouri, Inc.			
*	GE Capital Communication Services See GE Exchange			
31	Global Crossing Local Services, Inc. (Formerly Frontier Local Services, Inc.) 2710 Executive Drive Green Bay, WI 54307	f	Business only 800-414-1973 314-514-7383	St Louis metro, KC metro
32	Global Crossing Telemanagement, Inc. (Formerly Frontier Telemanagement, Inc.) 2710 Executive Drive Green Bay, WI 54307		Business only 800-414-1973 314-514-7383	All SWBT
33	Green Hills Telecommunications Services 7926 NE State Route M, P.O. Box 227 Breckenridge, MO 64625	f	Business and residential 800-846-3426	Sprint Missouri exchange of Norborne only
34	HJN Telecom, Inc. 3235 Satellite Blvd. Building 400, Suite 300 Duluth, GA 30096		Business and residential 800-345-2214	All SWBT
35	ICG Telecom Group, Inc. 161 Inverness Drive West Englewood, CO 80112		Business only 888-424-1144	All SWBT

#	Company	Type	Telephone Number	Service Area
36	IG2, Inc. (Formerly Computer Business Sciences, Inc.) 80-02 Kew Gardens Road, Suite 5000 Kew Gardens, NY 11415	f	Business and residential 800-428-8654	All SWBT
37	Intermedia Communications, Inc. 3625 Queen Palm Drive Tampa, FL 33619	f	Business only 800-536-6002	SWBT Area of St. Louis Metro
38	Ionex Communications, Inc. (Formerly Feist Long Distance Service, Inc.) 15305 Dallas Parkway, Suite 1500 Addison, TX 75001	f	Business only 972-392-4601 314-646-7522	All SWBT
39	KMC Telecom III, L.L.C. 3075 Breckinridge Blvd., Suite 415 Duluth, GA 30096		Business only 770-279-1003	All SWBT
	LCI International Telecom Corp. See Qwest Communications Corporation			
40	Level 3 Communications, LLC 1450 Infinite Drive Louisville, CO 80027	f	Business only 303-228-2240	St Louis metro
41	Local Line America, Inc. P.O. Box 4656 Akron, OH 44310	Prepaid	Business and residential 800-255-9943	All CenturyTel-MO, all Sprint, all CenturyTel, all ALLTEL
42	Logix Communications Corporation (Formerly Dobson Wireless, Inc.) 14101 Wireless Way Oklahoma City, OK 73134	f	Business only 888-391-8700 314-434-2200	St Louis metro, KC metro, Springfield metro
43	Mark Twain Communications Co. P.O. Box 128 Hurdland, MO 63547	f	Business and residential 660-423-5211	CenturyTel exchanges of LaBelle, Ewing and Lewistown
44	Maxcom, Inc. 10647 Widmer Road Lenexa, KS 66215		Business only 800-888-3157	All Brooks Fiber, KC and Springfield metro
45	Max-Tel Communications, Inc. 102 W. Franklin, P.O. Box 280 Alvord, TX 76225	Prepaid	Business and residential 800-583-2289 940-427-2149	All SWBT
46	MCI metro Access Transmission Services, LLC 701 Brazos, Suite 600 Austin, TX 78701	f	Business only 888-624-9266	St Louis metro, KC metro, Springfield metro
47	MCI Worldcom Communications, Inc. (Worldcom, Inc.) (Formerly WorldCom Technologies, Inc.) 701 Brazos, Suite 600 Austin, TX 78701	f	Business only 800-539-2000	SWBT areas of St. Louis metro KC metro Springfield metro
48	McLeodUSA Telecommunications Services, Inc. P. O. Box 3177 Cedar Rapids, IA 52406	f	Business and residential 800-743-0877	All SWBT
49	Metro Teleconnect (Metro Teleconnect Companies, Inc.) 2150 Herr Street Harrisburg, PA 17103	Prepaid	Business and residential 800-695-6955	All SWBT

#	Company	Type	Telephone Number	Service Area
*	Metro Teleconnect Companies, Inc. See Metro Teleconnect			
50	Missouri Comm South, Inc. (Comm South Companies, Inc.) 2909 Buckner Blvd., Suite 800, P.O. Box 821269 Dallas, TX 75228	Prepaid	Business and residential 800-936-5223	All SWBT
51	Missouri State Discount Telephone 804 Elkins Lake Huntsville, TX 77340	Prepaid	Business and residential 888-282-2041	All SWBT, all CenturyTel- MO, all Sprint, all CenturyTel, all ALLTEL
52	Missouri Telecom, Inc. 515 Cleveland, Suite C, P.O. Box 419 Monett, MO 65708	Reseller	Business and residential 417-235-0111 888-429-0648	SWBT exchanges of Carthage, Joplin, Lamar, Monette, Neosho, and Springfield
53	Navigator Telecommunications, L.L.C. 8525 Riverwood Park Drive, P.O. Box 13860 North Little Rock, AR 72113-0860	f	Business and residential 888-662-8835	All SWBT, all CenturyTel- MO, all Sprint, all CenturyTel
*	Nextlink Missouri, Inc. See XO Missouri, Inc.			
54	NOW Communications, Inc. 713 Country Place Drive Jackson, MS 39208	Prepaid	Business and residential 888-565-1011	All SWBT
55	NuVox Communications of Missouri, Inc. (Formerly Gabriel Communications of Missouri, Inc.) 16090 Swingley Ridge Road Chesterfield, MO 63017	f	Business only 877-422-2622	St Louis metro, KC metro, Springfield Metro
56	Omniplex Communications Group, LLC (Formerly USA eXchange, LLC) 17 Research Park Drive St. Charles, MO 63304	f	Business and residential 888-462-4782	All SWBT, all CenturyTel- MO, all CenturyTel
57	The Pager Company (Tri-State Telecom) 3030 East Truman Road Kansas City, MO 64127	Prepaid	Business and residential 816-472-4377	All SWBT
58	Payroll Advance 808 South Baker Mountain Home, AR 72643	Prepaid	Business and residential 877-425-4676	SWBT exchanges of Joplin, Kennett, Nevada
59	Phone Banc, Inc. 3212 State Avenue Kansas City, KS 66102	Prepaid	816-531-2055	All SWBT
60	Phone-Link, Inc. 230 Yager Avenue, Suite 3 LaGrange, KY 40031	Prepaid	Business and residential 800-220-1377	All CenturyTel-MO
*	Phones for All See Teléfonos Para Todos			
*	Preferred Carrier Services, Inc. See Teléfonos Para Todos			
*	Primary Network Communications (BroadSpan Communications, Inc.) See Mpower Communications Central Corp.			

#	Company	Type	Telephone Number	Service Area
61	QCC, Inc. (Formerly Quest Communications Corporation) 8829 Bond Street Overland Park, KS 66214	Prepaid	Business and residential 800-688-6424	All SWBT
62	Quick-Tel Communications, Inc. 456 W Rock Island, P.O. Box 1220 Bridgeport, TX 76426	Prepaid	800-659-3456	All SWBT
63	Qwest Communications Services (Qwest Communications Corporation) (Formerly LCI International Telecom Corp.) (Formerly USLD Communications, Inc.) 4250 N. Fairfax Drive, 12W002 Arlington, VA 22203	Reseller	Business and residential	All SWBT, all CenturyTel-MO, all Sprint, all CenturyTel
*	Reconex See 1-800-Reconex			
64	Ren-Tel Communications, Inc. 7337 S. Mitchell Ct. Villa Rica, GA 30180	Prepaid	Business and residential 678-715-6464 877-973-6835	All SWBT
65	Sage Telecom, Inc. 805 Central Expressway South, Suite 100 Allen, TX 75013-2789	f	Business and residential 888-449-4940	All SWBT
66	ServiSense.com, Inc. 180 Wells Avenue, Suite 450 Newton, MA 02459-3302	Reseller	Business and residential 888-483-3600	All SWBT
67	Simply Local Services, Inc. 2225 Apollo Dr. Fenton, MO 63026	Prepaid	Business and residential 800-466-1880	All SWBT
68	Smoke Signal Communications (Choctaw Communications, L.C.) 8400 South Gessner Houston, Texas 77074	Reseller	Business and residential 800-280-7903	All SWBT
*	Snappy Phone of Texas, Inc. See Snappy Phone			
69	Snappy Phone (Snappy Phone of Texas, Inc.) 6901 West 70th Street, P.O. Box 29620 Shreveport, LA 71149	Prepaid	Residential only 888-913-9565	All SWBT, all CenturyTel-MO, all Sprint, all CenturyTel
70	Socket Telecom, LLC 810 Cherry Street Columbia, MO 65201	f	Business and residential 573-817-0000	All SWBT, all CenturyTel-MO, all Sprint, all CenturyTel
71	Sprint Communications Company, L.P. 5454 West 110th Street Overland Park, KS 66211	f	Business and residential 877-232-7439	SWBT areas of KC Metro and St. Louis Metro
*	Sterling International Funding, Inc. See 1-800-Reconex, Inc.			
72	Suretel, Inc. 5 North McCormick Oklahoma City, OK 73127	Prepaid	Business and residential 800-386-5977	All SWBT

#	Company	Type	Telephone Number	Service Area
73	TCG Kansas City, Inc. Teleport Communications Group Two Teleport Drive Staten Island, NY 10311	f	Business only 718-355-2000	SWBT areas of Kansas City
74	TCG St. Louis Two Teleport Drive, Suite 300 Staten Island, NY 10311	f	Business only 314-569-1551	SWBT areas of St. Louis and eastern out-state Missouri
75	Tel Com Plus (United States Telecommunications, Inc.) 5251 110th Avenue, North, Suite 118 Clearwater, FL 33760-4837	Prepaid	Business and residential 800-300-9204 888-332-4033	All SWBT, all CenturyTel-MO, all CenturyTel
76	Teléfonos Para Todos (Preferred Carrier Services, Inc.) (Phones for All) 14681 Midway Road, Suite 105 Dallas, Texas 75244	Prepaid	Business and residential 888-478-0787	All SWBT
77	Tel-Link, L.L.C. 8601 Dunwoody Place, Suite 406 Atlanta, GA 30350	Prepaid	Business and residential 888-404-LINK	All SWBT, all Sprint
78	The Cube (Tin Can Communications Company, L.L.C.) 1063 Wirt Road, Suite 202 Houston, TX 77005	Prepaid	Business and residential 800-720-7674	All SWBT, all Sprint-MO
*	Tin Can Communications Company, L.L.C. See The Cube			
*	United States Telecommunications, Inc. See Tel Com Plus			
79	Universal Telecom, Inc. 105 East Adams Street Building II, Suite 200 LaGrange, KY 40031	Prepaid	Business and residential 888-788-7978	All SWBT, All CenturyTel-MO, all CenturyTel, all Sprint, all ALLTEL, New London. Orchard Farm, Stoutland
80	Universal Telephone 2405 E. Pawnee, Suite 10 Wichita, KS 67211-5455	Prepaid	Residential only	All SWBT
*	USA eXchange, LLC See Omniplex Communications Group			
*	USLD Communications, Inc. See Qwest Communications Corporation			
81	VarTec Telecom, Inc. 1600 Viceroy Drive Dallas, TX 75235	Reseller	Business and residential 800-708-7395	Some SWBT areas including KC Metro, Springfield Metro, St. Louis Metro and some outstate SWBT areas
82	Winstar Communications, LLC 1850 M Street, N.W., Suite 300 Washington, DC 20036	f	Business only 202-863-2890	SWBT areas of KC Metro and St. Louis Metro
*	Worldcom, Inc. See MCI Worldcom Communications, Inc.			
*	WorldCom Technologies, Inc. See MCI Worldcom Communications, Inc.			

#	Company	Type	Telephone Number	Service Area
83	XO Missouri, Inc. (f/k/a Nextlink Missouri, Inc.) 2020 Westport Center Drive Maryland Heights, MO 63146	f	Business only 877-604-9696	SWBT areas of St. Louis metro and vicinity
84	Z-Tel Communications, Inc. 601 South Harbour Island Blvd., Suite 220 Tampa, FL 33602	f	Business and residential 800-511-4572	All SWBT

* = Company is doing business in Missouri under another (e.g., fictitious) name.

f = Facility-based service.