

October 9, 2003

Mr. Thomas M. Dorman  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602

RE: Inquiry Into the Use of Contract Service Arrangements by  
Telecommunications Carriers in Kentucky—Case No. 2002-00456

Dear Mr. Dorman:

Enclosed are an original and five (5) copies of the Supplemental Direct Testimony of D. Scott Ringo, Jr., filed on behalf of Cincinnati Bell Telephone Company in the above-captioned proceeding. A duplicate original copy of this letter is enclosed; please date-stamp this copy as acknowledgement of its receipt and return it in the enclosed, self-addressed envelope. This filing is also being provided to the Commission via email for inclusion in the electronic case file. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-7260.

Sincerely,

Jouett Kinney  
Cincinnati Bell Telephone

Enclosures

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE )  
ARRANGEMENTS BY TELECOMMUNICATIONS ) CASE NO.  
CARRIERS IN KENTUCKY ) 2002-00456

**AFFIDAVIT OF D. SCOTT RINGO, JR.**

**STATE OF OHIO** )  
)  
**COUNTY OF HAMILTON** )

D. Scott Ringo, Jr., being first duly sworn states the following: The prepared Pre-filed Supplemental Direct Testimony appended hereto constitutes the direct supplemental testimony of the Affiant in the above-captioned proceeding. Affiant further states that his statements are true and correct to the best of his belief and knowledge. Further, Affiant sayeth naught.

**SUBSCRIBED AND SWORN to before me this \_\_<sup>th</sup> day of October, 2003.**

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

**Before the Kentucky Public Service Commission**

**Supplemental Direct Testimony of D. Scott Ringo Jr.**

**On behalf of**

**Cincinnati Bell Telephone Company**

**Case No. 2002-00456**

**October 10, 2003**

**Q. Please state your name, address and employment.**

A. My name is D. Scott Ringo Jr. and I am employed by Cincinnati Bell Telephone Company (CBT) as Director – Regulatory Affairs/Business Markets. I previously provided direct testimony in this proceeding on April 30, 2003.

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

A. The purpose of my supplemental testimony is provide support for the revised Joint Proposal of Alltel, Bellsouth and CBT as submitted on October 8, 2003. An initial draft of the proposal was discussed at the Commission’s workshop held on October 1. At the outset, I would also like to address certain aspects of the workshop process itself.

**Q. Do you have comments regarding the workshop held on October 1?**

A. Yes, I do. First, CBT would like to take this opportunity to applaud the Commission for convening the workshop and for participating as it did on October 1. While not all of the parties to this proceeding participated and not all that did participate agreed on a joint resolution of the issues in this proceeding, I believe that the workshop itself was very successful. The discussion and participation of those that attended, including staff, far exceeded CBT’s experience with informal conferences in other proceedings that have been convened by the staff or the Commission itself.

**Q. Why do you believe that industry workshops are beneficial?**

A. The workshop concept is a natural vehicle to address administrative or policy type issues, such as the proceeding at hand, because it allows an open and candid dialogue among the parties and staff. This forum gives the parties an opportunity to address concerns and issues and to make proposals in a manner that results in immediate feedback. CBT was impressed with the active participation of all parties in attendance at the workshop, including the staff.

**Q. Why is that dialogue so important?**

A. In CBT's opinion, a proceeding such as this one is better suited to provide an open discussion and generate a joint agreement to establish operating standards of the industry as a whole. The process is not well suited for an adversarial proceeding, which requires that the majority of evidence be gathered at a hearing. In my opinion, this proceeding was an opportunity to use a rulemaking type of process whereby the Commission opens the proceeding by convening an industry workshop. Based on the evidence gathered at the workshop, the PSC could release a proposed set of rules and solicit parties' comments on these rules. Following a comment/reply cycle, the PSC could then issue an order with its proposed findings and conclusions with proposed new regulations. Thereafter, the parties could present additional comments based on the proposed rules and thereafter, the PSC would issue its final set of rules. CBT's experience with the

workshop and rulemaking process in Ohio has been positive. Not only does it provide the parties and the Commission with an opportunity to explore all of the issues thoroughly but it is also less burdensome and confrontational than a formal hearing. Finally, because the parties have had an opportunity to be so involved from the start, the outcome is generally more acceptable to the parties.

**Q. Does CBT support the Joint Proposal as discussed at the workshop of October 1?**

A. CBT was an active participant in the creation of the Joint Proposal submitted for discussion at the workshop and is fully supportive of the revised Joint Proposal, submitted for the Commission's consideration by Joint Motion filed by Alltel, Bellsouth and CBT on October 8.

**Q. Why does CBT believe the proposal should be adopted by the Commission.**

A. CBT believes that the Joint Proposal provides an administrative and practical process whereby all companies can address the competitive telecommunications market. It also preserves the opportunity for parties as well as customers to address any alleged inappropriate use of CSAs through the Commission's complaint process.

**Q. In conclusion, would you please summarize CBT's position on the workshop and the Joint Proposal**

A. CBT believes the Commission's workshop of October 1 provided an excellent forum for addressing the issues raised in this proceeding. CBT also believes that such workshops can, and should, be used in the future as a regular part of a general rulemaking process and should result in the more efficient use of company and Commission resources as well as obviate the need in many instances to conduct formal hearings. In addition, CBT believes that the Commission should consider adopting the Joint Proposal as the final set of rules for the industry to follow in the competitive Kentucky marketplace.

**Q. Does this conclude your supplemental testimony?**

A. Yes it does.

## **CERTIFICATE OF SERVICE**

It is hereby certified that a true and accurate copy of the foregoing was served on the individuals on the attached Service List by first-class mail, postage prepaid, on the 9<sup>th</sup> day of October 2003.

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Thomasina Wooldridge