

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

In the Matter of:

<p style="text-align:center">An Investigation into the Intrastate Switched Access Rates of All Kentucky Incumbent and Competitive Local Exchange Carriers</p>

Adm. Case No. 2010-00398

**DIRECT TESTIMONY OF JOSEPH GILLAN
ON BEHALF OF
THE KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION,
TW TELECOM, LEVEL 3, AND PAETEC**

1 **Q. Please state your name, business address and occupation.**

2 A. My name is Joseph Gillan. My business address is P. O. Box 7498, Daytona
3 Beach, Florida 32116. I am an economist with a consulting practice specializing
4 in telecommunications.

5 **Q. Please briefly outline your educational background and related experience.**

6 A. I am a graduate of the University of Wyoming where I received B.A. and M.A.
7 degrees in economics. From 1980 to 1985, I was on the staff of the Illinois Com-
8 merce Commission where I had responsibility for the policy analysis of issues
9 created by the emergence of competition in regulated markets, in particular the
10 telecommunications industry. While at the Commission, I served on the staff
11 subcommittee for the NARUC Communications Committee and was appointed to
12 the Research Advisory Council overseeing the National Regulatory Research
13 Institute.

14 In 1985, I left the Commission to join U.S. Switch, a venture firm organized to
15 develop interexchange access networks in partnership with independent local

Direct Testimony of Joseph Gillan on behalf of the
Kentucky Cable Telecommunications Association,
tw telecom, Level 3 and PAETEC
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1 telephone companies. At the end of 1986, I resigned my position of Vice Presi-
2 dent – Marketing/Strategic Planning to begin a consulting practice.

3 Over the past thirty years I have testified over 300 times before more than 40 state
4 commissions, six state legislatures, the Commerce Committee of the United States
5 Senate, and the Federal/State Joint Board on Separations Reform. I have also
6 been called to provide expert testimony before federal and state courts by clients
7 as diverse as Qwest Communications and the trustees of a small competitive car-
8 rier in the Southeast. In addition, I have filed expert analysis with the Finance
9 Ministry of the Cayman Islands and before the Canadian Radio-Telecommunica-
10 tions Commission.

11 I serve on the Advisory Council to New Mexico State University’s Center for
12 Public Utilities (since 1985) and served as an instructor in their Principles of
13 Regulation program. In addition, I lecture at Michigan State University’s Regula-
14 tory Studies Program (“Camp NARUC”). I have also lectured at the School of
15 Laws at the University of London (England) and the School of Law at Northwest-
16 ern University (Chicago). I currently serve on the Board of Directors of the
17 Universal Service Administrative Company.

18 A complete listing of my qualifications, testimony and publications is provided in
19 Exhibit JPG-1 (attached).

1 **Q. On whose behalf are you testifying in this proceeding?**

2 A. I am testifying on behalf of the Kentucky Cable Telecommunications Association,
3 tw telecom of kentucky llc, Level 3 Communications, LLC, and US LEC of Ten-
4 nessee LLC d/b/a PAETEC Business Services.

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

6 A. The purpose of my direct testimony is to provide additional context to the issues
7 raised by the Commission in its Order initiating this proceeding.¹ As I explain
8 below, there is little concrete that can be recommended at this stage of the pro-
9 ceeding because foundational questions that must first be addressed – *i.e.*, what is
10 the goal of access reform, and what are the respective roles of the Federal Com-
11 munications Commission (“FCC”) and the States going forward – are currently
12 the subject of an FCC proceeding. Consequently, the best that can be done at this
13 juncture is to offer some general guidance and recommend additional data that the
14 Commission should collect so that it is able to better evaluate its options later in
15 the year (if and when) the FCC rules.

16 **Q. Will you recommend a specific access reform plan in your direct testimony?**

17 A. No. Until the FCC clarifies the Commission’s authority (and defines the desired
18 end-point of access reform), it is simply not possible to propose a specific plan.²

19 However, as I explain below, I recommend that the Commission refocus its data

¹ Order, Kentucky Public Service Commission, November 5, 2010 (“*Order Initiating Proceeding*”).

² This is not to say that other parties, seeking a reduction in intrastate access costs (and, therefore, an increase in long distance profits) will not propose plans in their direct testimony designed to achieve these ends. I will address such proposals (if any) in my rebuttal testimony.

1 collection effort so that it may evaluate the financial implications of an inter-
2 carrier compensation reform structure that would unify termination charges, but
3 which would leave originating access charges at current levels.³

4 **Q. Did the Commission recognize the important role of the FCC when it**
5 **initiated this proceeding?**

6 A. Yes. As the Commission then explained, a central purpose of the proceeding was
7 to develop an evidentiary basis for further action in response to an expected
8 federal decision:

9 The Commission will use this administrative proceeding to investi-
10 gate access charge reform within Kentucky and will use it as a for-
11 mal method of monitoring, analyzing, and applying changes imple-
12 mented by the FCC through the NBP [National Broadband Plan]
13 and the Connect America Fund.⁴

14 As the Commission is aware, the FCC has opened a proceeding with (among
15 other goals) the specific goal of achieving a comprehensive reform of the inter-
16 carrier compensation regime.⁵ The Commission adopted the current procedural

³ As I explain below, the Commission's data collection to date has focused on estimating the effect of moving intrastate switched access prices to interstate rates, without distinguishing between originating and terminating access service. An alternative approach would focus only on reforming the rates for terminating switched access. As noted, however, whether such an approach would seek to unify terminating access rates – or unify all terminating rates – is a question that must first be addressed by the FCC.

⁴ *Order Initiating Proceeding*, at 5 and 6.

⁵ See Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, In the Matter of the Connect America Fund (WC Docket No. 10-90), A National Broadband Plan for Our Future (GN Docket No. 09-51), Establishing Just and Reasonable Rates for Local Exchange Carriers (WC Docket No. 07-135), High-Cost Universal Service Support (WC Docket No. 05-337), Developing an Unified Intercarrier Compensation Regime (CC Docket No. 01-92), Federal-State Joint Board on Universal Service (CC Docket No. 96-45), and Lifeline and Link-Up (WC Docket No. 03-109), Federal Communications Commission, released February 9, 2011 (“*ICC/USF NPRM*”).

1 schedule after the FCC released its NPRM, providing for filing of testimony, but
2 is delaying hearing until after the Commission’s authority (if any) over the intra-
3 state access rates of “electing carriers” has reached finality.⁶

4 The Windstream appeal, however, is not the only challenge to the Commission’s
5 jurisdiction in the area of access reform. The FCC NPRM is considering two very
6 different approaches to intercarrier compensation reform and its choice could
7 redefine the traditional federal-state role.

8 **Q. Please describe the two approaches the FCC is considering for access reform**
9 **and explain how these choices would impact this proceeding.**

10 A. The two approaches (my labels) are: (a) the traditional approach, and (b) the §251
11 approach. The problem that the FCC is looking to solve is the disparate treatment
12 of different types of calls, which in today’s environment include not only inter-
13 state and intrastate access, but the charges for terminating local traffic (*i.e.*, the
14 reciprocal compensation regime).⁷

15 The “traditional approach” would rely on the FCC and the states maintaining their
16 existing jurisdictional authority, with the FCC responsible for interstate access
17 (and wireless service), and the states retaining jurisdiction over intrastate access.

⁶ See Order, Kentucky Public Service Commission, March 10, 2011 (“*March Order*”) at 2 (referencing *Windstream Kentucky West LLC et al. v. Kentucky Public Service Commission et al.*, Case No. 2009-CA-1973).

⁷ As explained by the FCC “a provider delivering a call to a local carrier pays a different per-minute rate based on whether the call originated across state lines (interstate access, regulated by the Commission), within the state (intrastate access, governed by state law and typically higher than interstate rates), or within the local calling area (reciprocal compensation, rates which are either negotiated by the parties, or set by states using a Commission methodology).” *ICC/USF NPRM* at ¶ 53.

1 An obvious difficulty with this approach is that it cannot credibly produce a single
2 national plan that would comprehensively address all intercarrier compensation.
3 Under this approach, the FCC would be directly addressing interstate traffic under
4 one statutory scheme (the 1934 Act), indirectly addressing local traffic through
5 another statutory scheme (the 1996 Act), and tangentially (if such is possible)
6 influencing intrastate access (subject to 51 individual statutory schemes) through
7 some other means.⁸ Getting to one end-point through three different schemes is a
8 hard path.

9 The alternative §251 approach would unify all intercarrier terminating rates, in-
10 cluding those for intrastate calls, under the reciprocal compensation framework.⁹

11 Under this framework, the FCC would establish the pricing methodology and the
12 states would establish the specific rates. The §251 alternative is notable for three
13 critical implications directly relevant to this proceeding. Under the §251
14 approach:

- 15 * The Kentucky Commission would no longer have exclusive
16 jurisdiction over the category of traffic now called “terminating
17 intrastate access.” Rather, the Commission’s role would be to
18 implement federal rules that would describe a methodology for
19 setting termination rates (although the Kentucky Commission
20 would establish the actual rates).
- 21 * Only terminating access prices would be affected (because §251
22 only applies to the transport and termination of telecommuni-
23 cations).

⁸ For instance, the FCC is asking whether it should condition a state’s participation in the (not yet adopted) Connect America Fund on the state implementing federally prescribed changes to its intrastate access regime. *ICC/USF NPRM* at ¶ 296.

⁹ *ICC/USF NPRM* at ¶¶ 512-20.

1 * The target for “access reform” would not be to establish intrastate
2 rates at parity with interstate access, but to reduce all terminating
3 access to reciprocal compensation (or some other rate).

4 **Q. Are there steps that the Commission can take, even as the FCC is evaluating**
5 **which approach to intercarrier compensation it will adopt?**

6 A. Yes. The Commission should collect information specific to terminating access
7 so that it has an understanding of the financial implications of reducing intrastate
8 terminating access to some other rate level (whether it is interstate access or reci-
9 procal compensation).¹⁰ The Commission has previously requested that ILECs
10 provide “the amount of access revenue shift they would experience if their
11 intrastate switched access rates mirror their interstate switched access rates.”¹¹

12 The Commission should supplement this information by requesting:

13 * The amount of access revenue shift the ILECs would experience if
14 their intrastate terminating switched access rates mirror their inter-
15 state terminating switched access rates (2009 and 2010);

16 * The number of terminating interstate and intrastate access minutes
17 for 2009 and 2010;

18 * The amount of access revenue shift the ILECs would experience if
19 their intrastate and interstate terminating switched access rates
20 mirror their reciprocal compensation rates (2009 and 2010); and

21 * The number of reciprocal compensation minutes for 2009 and
22 2010.¹²

23 This information will position the Commission to achieve its stated intention of
24 “monitoring, analyzing, and applying [the potential] changes implemented by the

¹⁰ Indeed, the parities sponsoring this testimony intend to request such information when the Commission’s second window for discovery opens (if the Commission does not directly request the data as recommended herein).

¹¹ *March Order*, Appendix A.

¹² The Commission should also make clear that the ILECs’ responses should be filed in electronic spreadsheet (Excel) form.

1 FCC” through this proceeding.¹³ As noted above, the Commission already re-
2 quired the ILECs to provide data consistent with the FCC’s “traditional approach”
3 to intercarrier compensation reform (*i.e.*, based on existing jurisdictional lines);
4 what is recommended here is that the Commission also require the ILECs to pro-
5 vide the data that will enable it to evaluate the “§251 approach” being considered
6 by the FCC as well.

7 **Q. Should the Commission consider reforming originating intrastate access?**

8 A. No. Originating access is a vestige of a market structure that has virtually disap-
9 peared.¹⁴ Originating access charges were needed in the days when customers
10 typically obtained long distance service from one company and local exchange
11 service from another. This structure was mandated by the AT&T Divestiture,
12 which separated AT&T’s local and long distance operations and prohibited its
13 former local affiliates (such as South Central Bell) from providing long distance
14 service.

15 Today, however, most consumers and businesses obtain local and long distance
16 service from the same company, under pricing plans that bundle local and long
17 distance service. The most recent statistics from the FCC indicate that over 70%
18 of the ILECs’ residential lines are presubscribed to the ILEC or its affiliate for

¹³ *Order Initiating Proceeding*, at 6.

¹⁴ As used in this testimony, originating access refers to the delivery of a call from a local telephone company’s customer to a long distance carrier. Terminating access refers to the completion of a call from the customer of a long distance company to a customer of a local telephone company.

1 long distance service (and 60% of all residential and business subscribers).¹⁵ For
2 non-RBOC ILECs, the overall percentage is somewhat higher (63%), largely due
3 to their greater success in the business market.¹⁶

4 **Q. Would reductions in originating access charges produce lower long distance**
5 **prices in Kentucky?**

6 A. No, I don't believe that to be the case. The factual reality is that stand-alone long
7 distance services are not price leaders (or even followers), as much as remnants of
8 a bygone era. These stand-alone long distance services are priced at a premium
9 because the price-sensitive customers have long ago moved to a bundle or pack-
10 age, and it is unlikely that any reduction in originating access would produce a
11 matching reduction in the per-minute charge of those services that still have per-
12 minute pricing.

13 For instance, AT&T charges \$0.19 per minute for intrastate long distance service
14 in Kentucky as part of its *One Rate Plus*® service (which includes a monthly fee
15 of \$5.95 in addition to the per-minute charges).¹⁷ It is hard to imagine that
16 Kentucky's access prices play a significant role in AT&T's retail pricing deci-
17 sions for this service, which charges the same intrastate toll rate in Alabama,
18 Colorado, Georgia, Indiana, Iowa, Kentucky, Louisiana, Maine, Michigan,

¹⁵ Local Telephone Competition: Status as of June 30, 2010, Industry Analysis and Technology Division, Wireline Competition Bureau, Federal Communications Commission, released March 2011, Table 7.

¹⁶ *Ibid.* Specifically, non-RBOC ILECs report a penetration of 68% in the residential market (the RBOCs have 71%), and a penetration of 51% in the business market (as contrasted with 43% for the RBOCs).

¹⁷ See Exhibit JPG-2.

1 Mississippi, Montana, Nevada, North Carolina, North Dakota, Ohio, Oregon,
2 Pennsylvania, South Carolina, South Dakota, Tennessee, Vermont, Washington,
3 Wisconsin, and Wyoming.

4 Indeed, with the multi-state pricing strategy that AT&T practices, it is difficult to
5 see how intrastate access prices play any role in AT&T's retail pricing decision.
6 AT&T itself has characterized some of these states as having substantially imple-
7 mented intrastate access rates at parity with interstate access (Michigan), while
8 listing other states as having no reform activity (Montana).¹⁸ Apparently, when it
9 comes to AT&T's retail pricing, establishing uniform rates across states with
10 similar degrees of pricing flexibility appears to be more important than the
11 underlying access charge.

12 **Q. Are there other reasons why the Commission should focus only on**
13 **terminating switched access?**

14 A. Yes. It is only with terminating access that disparate prices give rise to the
15 operational concerns of arbitrage. As explained by the FCC:

16 [I]nefficient ICC rules create incentives for wasteful arbitrage. In
17 particular, because rates that local carriers receive to deliver a call
18 vary widely depending on where the call originated and the classi-
19 fication and type of service providers involved, the carriers paying
20 such charges may mask the origination of voice traffic to reduce or
21 avoid payments....¹⁹

¹⁸ See Letter from Brian J. Benison, AT&T, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92; WC Docket No. 05-337; GN Docket No. 09-51, Attachs. 1 & 2 (filed Oct. 25, 2010) (describing access reforms in various states); see also AT&T Response to RLECs First Data Requests, item no. 8, Attach. 2 (filed June 13, 2011 in this proceeding) (same).

¹⁹ *ICC/USF NPRM* at ¶ 7.

1 In contrast, for originating access, the ILEC itself creates the call detail records
2 that define which charges apply and the opportunity for arbitrage (whether
3 harmful or not) is avoided. It is only in the area of terminating access that a
4 carrier can mask the jurisdictional nature of a call. Consequently, the Commis-
5 sion can address the principal justification for access reform solely by reducing
6 terminating access, while allowing originating access to effectively disappear as
7 more and more consumers/businesses obtain local and long distance service from
8 the same provider (or affiliates).

9 **Q. Please summarize your direct testimony.**

10 A. My direct testimony is necessarily short because of the underlying tension be-
11 tween the Commission's procedural schedule and its stated goal that this proceed-
12 ing should enable the "monitoring, analyzing, and applying [the potential]
13 changes implemented by the FCC."²⁰ The reality is that the FCC's NPRM
14 directly challenges one of the foundational assumptions of this proceeding that the
15 Kentucky Commission will retain jurisdiction to revise intrastate access rates
16 under its existing jurisdictional authority. However, even if the FCC decides to
17 maintain existing jurisdictional lines, I would recommend that the Commission
18 limit its analysis to the reform of terminating access and that it collect the
19 necessary data to do so.

²⁰ *Order Initiating Proceeding*, at 6. Although the Commission declined to set a hearing date (recognizing that the Windstream appeal may affect its jurisdiction), the testimony filing dates do not recognize that the FCC's *ICC/USF NPRM* places the Commission's jurisdictional role in a similarly uncertain posture.

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

2 A. Yes.

VERIFICATION

The answers in the foregoing testimony are true and correct to the best of my knowledge and belief.

/s/ Joseph Gillan
Joseph Gillan

STATE OF Florida)

COUNTY OF Volusia)

Subscribed and sworn to before me by Joseph Gillan, on this the 7th day of July, 2010.

/s/ Lisa N. Burt
Notary Public

My Commission Expires: 7-9-14

(SEAL)

Joseph Gillan
Gillan Associates
joegillan@earthlink.net

Education

B.A. Economics, University of Wyoming, 1978.
M.A. Economics, University of Wyoming, 1979.

Professional History

Gillan Associates, Economic Consulting (1987-Present)

Mr. Gillan manages a private consulting practice specializing in the economic evaluation of regulatory policies and business opportunities in the telecommunications industry. Since forming his consulting practice in 1987, Mr. Gillan has advised business clients as diverse as AT&T and TDS Telecom (a small entrant seeking the authority to compete in a rural area). Mr. Gillan has also acted as the principal economic consultant to the Competitive Telecommunications Association (COMPTEL) as well as CompSouth.

Vice President, US Switch, Inc. (1985-1987)

Responsible for crafting the US Switch business plan to gain political acceptance and government approval. US Switch pioneered the concept of "centralized equal access," which positioned independent local telephone companies for a competitive long distance market. While with US Switch, Mr. Gillan was responsible for contract negotiation/marketing with independent telephone companies and project management for the company's pilot project in Indiana.

Policy Director/Market Structure - Illinois Commerce Commission (1980-1985)

Primary staff responsibility for the policy analysis of issues created by the emergence of competition in regulated markets, in particular the telecommunications industry. Mr. Gillan served on the staff subcommittee for the NARUC Communications Committee and was appointed to the Research Advisory Council overseeing NARUC's research arm, the National Regulatory Research Institute.

Mountain States Telephone Company - Demand Analyst (1979)

Responsible for conducting statistical analysis of the demand for access by residential subscribers.

Professional Appointments

Board of Directors	Universal Service Administrative Company 2008-Present
Guest Lecturer	Northwestern University Law School 2007
Guest Lecturer	School of Laws, University of London, 2002, 2008

Professional Appointments (cont)

Instructor	Michigan State University, Regulatory Instructional Program, 2005-Present
Instructor	Principles of Regulation, New Mexico State University Center for Regulation
Advisory Council	New Mexico State University, Center for Regulation, 1985 – Present
Faculty	Summer Program, Public Utility Research and Training Institute, University of Wyoming, 1989-1992
Contributing Editor	<u>Telematics: The National Journal of Communications Business and Regulation</u> , 1985 - 1989
Chairman	Policy Subcommittee, NARUC Staff Subcommittee on Communications, 1984-1985
Advisory Committee	National Regulatory Research Institute, 1985
Distinguished Alumni	University of Wyoming, 1984

Selected Publications

"The Local Exchange: Regulatory Responses to Advance Diversity", with Peter Rohrbach, Public Utilities Fortnightly, July 15, 1994.

"Reconcentration: A Consequence of Local Exchange Competition?", with Peter Rohrbach, Public Utilities Fortnightly, July 1, 1994.

"Diversity or Reconcentration?: Competition's Latent Effect", with Peter Rohrbach, Public Utilities Fortnightly, June 15, 1994.

"Consumer Sovereignty: An Proposed Approach to IntraLATA Competition", Public Utilities Fortnightly, August 16, 1990.

"Reforming State Regulation of Exchange Carriers: An Economic Framework", Third Place, University of Georgia Annual Awards Competition, 1988, Telematics: The National Journal of Communications, Business and Regulation, May, 1989.

"Regulating the Small Telephone Business: Lessons from a Paradox", Telematics: The National Journal of Communications, Business and Regulation, October, 1987.

"Market Structure Consequences of IntraLATA Compensation Plans", Telematics: The National Journal of Communications, Business and Regulation, June, 1986.

"Universal Telephone Service and Competition on the Rural Scene", Public Utilities Fortnightly, May 15, 1986.

Selected Publications (continued)

"Strategies for Deregulation: Federal and State Policies", with Sanford Levin, Proceedings, Rutgers University Advanced Workshop in Public Utility Economics, May 1985.

"Charting the Course to Competition: A Blueprint for State Telecommunications Policy", Telematics: The National Journal of Communications Business, and Regulation, with David Rudd, March, 1985.

"Detariffing and Competition: Options for State Commissions", Proceedings of the Sixteenth Annual Conference of Institute of Public Utilities, Michigan State University, December 1984.

International Assignments

The Federal Universal Service System in the United States: A History of Spiraling Contribution, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada.

The Appropriate Pricing Standard for Wholesale Loops, with George Hariton, Telecommunications Issues and Analysis, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada.

Forcing a Square Peg into a Round Hole: Applying the Universal Service Cost Model in the Cayman Islands, Analysis Presented to the Government of the Cayman Islands on behalf of Cable and Wireless.

Recovering Contribution: Lessons from the United States' Experience, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of CallNet.

Listing of Expert Testimony – Court Proceedings

Trinsic, Inc. et al., v. Thermo Credit, LLC, (Bankruptcy Case No. 07-10324-MAM-7 United States Bankruptcy Court, Southern District of Alabama, Southern Division)(Industry Structure/Federal Policy/Local Entry Strategies)

ACD Telecom, Inc., v. Michigan Bell Telephone Company, d/b/a SBC Michigan, (Civil Action No. 04-689-CK Circuit Court for the County of Ingham Michigan) (Breach of Contract/Industry Terminology)

MCI, L.L.C. dba Verizon Business vs. Vorst Paving, Inc., (Civil Action NO. CV: 106-064 District Court for the Southern District Of Georgia) (Damages Claim)

United States of America v. SBC Communications Inc. and AT&T Corp. (Civil Action No. 1:05CV02102 District Court for the District of Columbia) (Inadequacy of Proposed Final Judgment Settling SBC Merger with AT&T)

United States of America v. Verizon Communications Inc. and MCI Inc. (Civil Action No. 1:05CV02103 District Court for the District of Columbia) (Inadequacy of Proposed Final Judgment Settling Verizon Merger with MCI)

Listing of Expert Testimony – Court Proceedings (continued)

T & S Distributors, LLC, ACD Telecom, Inc, Telnet Worldwide, Inc et al. v. Michigan Bell Telephone Company (Civil Action No. 04-689-CK Ingham Circuit Court, State of Michigan) (Enforcement of contract; Industry definitions of local exchange service and end user)

Dwayne P. Smith, Trustee v. Lucent Technologies (Civil Action No. 02-0481 Eastern District of Louisiana)(Entry and CLEC Performance)

BellSouth Intellectual Property v. eXpeTel Communications (Civil Action No. 3:02CV134WS Southern District of Miss.)(Service definition, industry structure and Telecom Act of 1996)

CSX Transportation Inc. v. Qwest International, Inc. (Case No. 99-412-Civ-J-21C Middle District of Florida) (industry structure and wholesale contract arrangements).

Winn v. Simon (No. 95-18101 Hennepin Cty. Dist. Ct.)(risk factors affecting small long distance companies)

American Sharecom, Inc. v. LDB Int’l Corp. (No. 92-17922, Hennepin County District Court) (risk factors affecting small long distance companies)

World Com, Inc. et al. v. Automated Communications, Inc. et al. (No. 3:93-CV-463WS, S.D. Miss.) (damages)

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Ohio	Case 10-2387-TP-COI	Access Reform	Ohio Cable Asse.
Missouri	TC-2011-0132	Resale of Promotions	Nexus
Alabama	Docket 31317	Resale of Promotions	Reseller Coalition
North Carolina	Docket P-836, Sub 5	Resale of Promotions	Reseller Coalition
South Carolina	Docket 2010-14-C	Resale of Promotions	Reseller Coalition
Louisiana	Docket U-31364	Resale of Promotions	Reseller Coalition
Louisiana	Docket No. U-31107	ETC/Study Area Redefinition	Cox
South Carolina	Docket 2009-326-C	USF and Deregulation	SCTA/CompSouth
New Mexico	Case No. 07-00316-UT	Prison Payphone Rates	PCS Inc.
Montana	Docket 2005.6.105	Use of USF Support	PSC Staff
Colorado	Docket No. 07A-211T	UNE Price Cap	CBeyond
California	Rulemaking 08-01-005	Copper Retirement	CalTel
Texas	Docket No. 34723	Universal Service Reform	Reform Coalition

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Missouri	Case TO-2006-0360	Wire Center Classification	CLEC Coalition
FCC	WC Docket 06-172	E911 as Measure of Local Comp	CLEC Coalition
Georgia	Docket 14361-U	Time Value of Money	CLEC Coalition
Kentucky	Case No. 2006-000316	271 Pricing – Loop and Switch	Southeast Tel
New York	Case No. 06-C-0897	Verizon Pricing Flexibility	CompTel/XO
Tennessee	Docket 06-00093	AT&T-BellSouth Acquisition	CLEC Coalition
Mississippi	No. 2006-UA-164	AT&T-BellSouth Acquisition	NuVox/TWTC
Kentucky	Case No. 2006-00136	AT&T-BellSouth Acquisition	NuVox/Xspedius
Indiana	Cause No. 42986	Wire Center Impairment List	COVAD/NuVox
Ohio	05-1393-TP-UNC	Wire Center Impairment List	CLEC Coalition
Illinois	Docket 06-0029	Wire Center Impairment List	CLEC Coalition
Illinois	Docket 06-0027	AT&T Illinois Deregulation	Data Net Systems
Oklahoma	Cause PUD 20060034	Wire Center Impairment List	CLEC Coalition
Kansas	06-SWBT-743-COM	Wire Center Impairment List	CLEC Coalition
Arkansas	Docket 05-140-C	Wire Center Impairment List	CLEC Coalition
Georgia	Docket 19341-U (II)	Establishing Section 271 Rates	CompSouth
Texas	Docket 31303	Wire Center Impairment List	CLEC Coalition
Washington	Docket UT-050814	Verizon-MCI Merger	Covad
California	Application 05-04-020	Verizon-MCI Merger	Cox
California	Application 05-04-020	Verizon-MCI Merger	Covad/CalTel
Oklahoma	Cause 200400695	Supersedes Bond	Cox
Florida	Docket 041269-TP	TRRO Implementation	CompSouth
Mississippi	Docket 2005-AD-139	TRRO Implementation	CompSouth
South Carolina	Docket 2004-316-C	TRRO Implementation	CompSouth
Kentucky	Case No. 2004-00427	TRRO Implementation	CompSouth
Alabama	Docket No. 29543	TRRO Implementation	CompSouth
Louisiana	Docket No. U-28356	TRRO Implementation	CompSouth
North Carolina	Docket P-55, Sub 1549	TRRO Implementation	CompSouth
Tennessee	Docket No. 04-00381	TRRO Implementation	CompSouth

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Georgia	Docket No. 19341-U	TRRO Implementation	CompSouth
California	Application 05-02-027	SBC-AT&T Merger	Cox
California	Application 05-02-027	SBC-AT&T Merger	CalTel
Oklahoma	Cause 200400695	SBC Deregulation	Cox
Kansas	05-SWBT-907-PDR	SBC Deregulation	Cox-WorldNet
Wisconsin	6720-TI-196	SBC Deregulation	CUB
Oklahoma	Cause 200400042	Status of Local Competition	Cox
Michigan	Case U-14323	SBC Deregulation	Talk America
Oklahoma	Cause RM 200400014	Regulatory Flexibility for SBC	CLEC Coalition
New Mexico	Case No. 3567	Regulation of Wireless Carriers	Wireless Coalition
North Carolina	Docket P-19 Sub 277	Alternative Regulation	CompSouth
North Carolina	Docket P-55 Sub 1013	Alternative Regulation	CompSouth
Mississippi	Docket 2003-AD-714	Switching Impairment	CompSouth
Kentucky	Case No. 2003-00379	Switching Impairment	CompSouth
Texas	Docket 28607	Switching Impairment	CLEC Coalition
Massachusetts	D.T.E 03-60	Switching Impairment	CLEC Coalition
Louisiana	Docket U-27571	Switching Impairment	CompSouth
New Jersey	Docket TO03090705	Switching Impairment	CLEC Coalition
Kansas	03-GIMT-1063-GIT	Switching Impairment	CLEC Coalition
South Carolina	Docket 2003-326-C	Switching Impairment	CompSouth
Alabama	Docket 29054	Switching Impairment	CompSouth
Illinois	Docket No. 03-0595	Switching Impairment	AT&T
Indiana	Cause No. 42500	Switching Impairment	AT&T
Pennsylvania	Case I-00030099	Switching Impairment	CLEC Coalition
Tennessee	Docket No. 03-00491	Switching Impairment	CompSouth
North Carolina	P-100, Sub 133Q	Switching Impairment	CompSouth
Georgia	Docket No. 17749-U	Switching Impairment	CompSouth
Missouri	Case TW-2004-0149	Switching Impairment	CLEC Coalition
Michigan	Case No. U-13796	Switching Impairment	CLEC Coalition

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Florida	Docket No. 030851-TP	Switching Impairment	FCCA
Ohio	Case 03-2040-TP-COI	Switching Impairment	AT&T/ATX
Wisconsin	05-TI-908	Switching Impairment	AT&T
Washington	UT-023003	Local Switching Rate Structure	AT&T/MCI
Arizona	T-00000A-00-0194	UNE Cost Proceeding	AT&T/WCOM
Illinois	Docket 02-0864	UNE Cost Proceeding	AT&T
North Carolina	P-55, Sub 1013 P-7, Sub 825 P-19, Sub 277	Price Cap Proceedings	CLEC Coalition
Kansas	02-GIMT-555-GIT	Price Deregulation	Birch/AT&T
Texas	Docket No. 24542	Cost Case	AT&T
North Carolina	Docket P-100, Sub 133d	UNE Cost Proceeding	CLEC Coalition
Georgia	Docket No. 11901-U	DSL Tying Arrangement	WorldCom
Tennessee	Docket No. 02-00207	UNE Availability/Unbundling	CLEC Coalition
Utah	Docket No. 01-049-85	Local Switching Costs/Price	AT&T
Tennessee	Docket No. 97-00309	Section 271 Compliance	CLEC Coalition
Illinois	Docket No. 01-0662	Section 271 Compliance	AT&T
Georgia	Docket No. 14361-U	UNE Availability/Unbundling	CLEC Coalition
Florida	Docket 020507-TL	Unlawful DSL Bundling	CLEC Coalition
Tennessee	Docket No. 02-00207	UNE Availability/Unbundling	CLEC Coalition
Georgia	Docket No. 14361-U	UNE Costs and Economics	AT&T/WorldCom
Florida	Docket 990649-TP	UNE Cost and Price Squeeze	AT&T/WorldCom
Minnesota	P-421/CI-01-1375	Local Switching Costs/Price	AT&T
Florida	Docket 000075-TP	Intercarrier Compensation	WorldCom
Texas	Docket No. 24542	Unbundling and Competition	CLEC Coalition
Illinois	Docket 00-0732	Certification	Talk America
Indiana	Cause No. 41998	Structural Separation	CLEC Coalition
Illinois	Docket 01-0614	State Law Implementation	CLEC Coalition
Florida	Docket 96-0768	Section 271 Application	SECCA
Kentucky	Docket 2001-105	Section 271 Application	SECCA

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
FCC	CC Docket 01-277	Section 271 for GA and LA	AT&T
Illinois	Docket 00-0700	Shared Transport/UNE-P	CLEC Coalition
North Carolina	Docket P-55 Sub 1022	Section 271 Application	SECCA
Georgia	Docket 6863-U	Section 271 Application	SECCA
Alabama	Docket 25835	Section 271 Application	SECCA
Michigan	Case No. U-12622	Shared Transport/UNEs	AT&T
Ohio	Case 00-942-TP-COI	Section 271 Application	AT&T
Alabama	Docket No. 25835	Structural Separation	SECCA
Alabama	Docket No. 27821	UNE Cost Proceeding	ITC^Deltacom
Louisiana	Docket U-22252	Section 271 Application	SECCA
Mississippi	Docket 97-AD-321	Section 271 Application	SECCA
South Carolina	Docket 2001-209-C	Section 271 Application	SECCA
Colorado	Docket 99A-577T	UNE Cost Proceeding	AT&T
Arizona	Case T-00000A-00-0194	UNE Cost Proceeding	AT&T
Washington	Docket UT-003013	Line Splitting and Combinations	AT&T
Ohio	Case 00-1368-TP-ATA Case 96-922-TP-UNE	Shared Transport	AT&T/PACE
North Carolina	P-100 Sub 133j	Standard Collocation Offering	CLEC Coalition
Florida	Docket 990649-TP	UNE Cost Proceeding	CLEC Coalition
Michigan	Case No. U-12320	UNE Combinations/Section 271	AT&T
Florida	Docket 00-00731	Section 251 Arbitration	AT&T
Georgia	Docket 5825-U	Universal Service Fund	CLEC Coalition
South Carolina	97-239-C	Universal Service Fund	CLEC Coalition
Texas	PUC Docket 22289/95	ETC Designation	Western Wireless
Washington	Docket UT-003013	UNE Costs and Local Competition	AT&T
New York	Docket 98-C-1357	UNE Cost Proceeding	Z-Tel
Colorado	Docket 00K-255T	ETC Designation	Western Wireless
Kansas	99-GCCZ-156-ETC	ETC Designation	Western Wireless
New Mexico	98-484-TC	ETC Designation	Western Wireless

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Illinois	Docket 99-0535	Cost of Service Rules	AT&T/MCI
Colorado	Docket 00-B-103T	U S WEST Arbitration	ICG Comm.
North Dakota	PU-1564-98-428	ETC Designation	Western Wireless
Illinois	Docket 98-0396	Shared Transport Pricing	AT&T/Z-Tel
Florida	Docket 981834-TP	Collocation Reform	CLEC Coalition
Pennsylvania	M-00001353	Structural Separation of Verizon	CompTel/ATX
Illinois	Docket 98-0860	Competitive Classification of Ameritech's Business Services	CompTel/ AT&T
Georgia	Docket 6865-U	Complaint re: Combinations	MCIWorldcom
Virginia	Case No. PUC 990100	GTE/Bell Atlantic Merger	AT&T
Florida	Docket 990649-TP	UNE Cost and Pricing	CLEC Coalition
Nebraska	Application C-1960/PI-25	IP Telephony and Access Charges	ICG Communications
Georgia	Docket 10692-U	Pricing of UNE Combinations	CLEC Coalition
Colorado	Docket 99F-141T	IP Telephony and Access	Qwest
California	Case A. 98-12-005	GTE/Bell Atlantic Merger	AT&T/MCI
Indiana	Case No. 41255	SBC/Ameritech Merger	AT&T
Illinois	Docket 98-0866	GTE/Bell Atlantic Merger	AT&T
Ohio	Case 98-1398-TP-AMT	GTE/Bell Atlantic Merger	AT&T
Tennessee	Docket 98-00879	BellSouth BSE	SECCA
Missouri	Case TO-99-227	§ 271 Review: SBC	AT&T
Colorado	Docket 97A-540T	Stipulated Price Cap Plan/USF	CLEC Coalition
Illinois	ICC Docket 98-0555	SBC/Ameritech Merger	AT&T
Ohio	Case 98-1082-TP-AMT	SBC/Ameritech Merger	AT&T
Florida	Docket 98-1121-TP	UNE Combinations	MCI WorldCom
Georgia	6801-U	§ 251 Arbitration: BellSouth	AT&T
Florida	92-0260-TL	Rate Stabilization Plan	FIXCA
South Carolina	Docket 96-375	§ 251 Arbitration: BellSouth	AT&T
Kentucky	Docket 96-482	§ 251 Arbitration: BellSouth	AT&T

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Wisconsin	05-TI-172/5845-NC-101	Rural Exemption	TDS Metro
Louisiana	U-22145	§ 251 Arbitration: BellSouth	AT&T
Mississippi	96-AD-0559	§ 251 Arbitration: BellSouth	AT&T
North Carolina	P-140-S-050	§ 251 Arbitration: BellSouth	AT&T
Tennessee	96-01152	§ 251 Arbitration: BellSouth	AT&T
Arizona		§ 251 Arbitration: US West	AT&T Wireless
Florida	96-0883-TP	§ 251 Arbitration: BellSouth	AT&T
Montana	D96.11.200	§ 251 Arbitration: US West	AT&T
North Dakota	PU-453-96-497	§ 251 Arbitration: US West	AT&T
Texas	Docket 16226	§ 251 Arbitration: SBC	AT&T/MCI
Alabama	Docket 25703	§ 251 Arbitration: BellSouth	AT&T
Alabama	Docket 25704	§ 251 Arbitration: GTE	AT&T
Florida	96-0847-TP	§ 251 Arbitration: GTE	AT&T
Kentucky	Docket 96-478	§ 251 Arbitration: GTE	AT&T
North Carolina	P-140-S-51	§ 251 Arbitration: GTE	AT&T
Texas	Docket 16630	§ 251 Arbitration: SBC	LoneStar Net
South Carolina	Docket 96-358	§ 251 Arbitration: GTE	AT&T
Texas	Docket 16251	§ 271 Review: SBC	AT&T
Oklahoma	97-0000560	§ 271 Review: SBC	AT&T
Kansas	97-SWBT-411-GIT	§ 271 Review: SBC	AT&T
Alabama	Docket 25835	§ 271 Review: BellSouth	AT&T
Florida	96-0786-TL	§ 271 Review: BellSouth	FCCA
Georgia	Docket 6863-U	§ 271 Review: BellSouth	AT&T
Kentucky	Docket 96-608	§ 271 Review: BellSouth	AT&T
Louisiana	Docket 22252	§ 271 Review: BellSouth	AT&T
Texas	Docket 16226	UNE Cost	AT&T/MCI
Colorado	97K-237T	Access Charges	AT&T
Mississippi	97-AD-321	§ 271 Review: BellSouth	AT&T
North Carolina	P-55 Sub 1022	§ 271 Review: BellSouth	AT&T

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
South Carolina	97-101-C	§ 271 Review: BellSouth	AT&T
Tennessee	97-00309	§ 271 Review: BellSouth	AT&T
Tennessee	96-00067	Wholesale Discount	AT&T
Tennessee	97-00888	Universal Service	AT&T
Texas	Docket 15711	GTE Certification as CLEC	AT&T
Kentucky	97-147	BellSouth BSE Certification	SECCA
Florida	97-1056-TX	BellSouth BSE Certification	FCCA
North Carolina	P691 Sub O	BellSouth BSE Certification	SECCA
Florida	98-0696-TP	Universal Service	FCCA
New York	97-C-271	§ 271 Review: Bell Atlantic	CompTel
Montana	D97.5.87	§ 271 Review: US West	AT&T
New Mexico	97-106-TC	§ 271 Review: US West	AT&T/CompTel
Nebraska	C-1830	§ 271 Review: US West	AT&T
Alabama	Docket 25980	Universal Service	AT&T
Kentucky	Admin 360	Universal Service	AT&T
North Carolina	P100-S133B	Universal Service	AT&T
North Carolina	P100-S133G	Universal Service	AT&T
Illinois	95-0458/0531	Combined Network Elements	WorldCom
Illinois	96-0486/0569	Network Element Cost/Tariff	WorldCom
Illinois	96-0404	§ 271 Review: Ameritech	CompTel
Florida	97-1140-TP	Combining Network Elements	AT&T/MCI
Pennsylvania	A-310203-F0002	Local Competition	CompTel
Georgia	6415-U/6527-U	Local Competition	CompTel
Illinois	98-NOI-1	Structural Separation	CompTel/Qwest
New York	98-C-690	Combining Network Elements	CompTel
Texas	Docket 17579	§ 251 Arbitration: SBC (2nd)	AT&T/MCI
Texas	Docket 16300	§ 251 Arbitration: GTE	AT&T
Florida	Docket 920260-TL	Price Cap Plan	IXC Coalition
Louisiana	Docket U22020	Resale Cost Study	AT&T/LDDS

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
California	Docket R.93-04-003	Rulemaking on Open Network Architecture	LDDS/WorldCom
Tennessee	Docket 96-00067	Avoidable Cost/Resale Discount	AT&T
Georgia	Docket 6537-U	Unbundled Loop Pricing	CompTel
Georgia	Docket 6352	Rules for Network Unbundling	AT&T
Pennsylvania	Docket A-310203F0002	Introducing Local Competition	CompTel
Florida	Docket 95-0984-TP	Interconnection Terms and Prices	AT&T
Kentucky	Case No. 365	Local Competition/Universal Service	WorldCom
Mississippi	Docket 95-UA-358	Introducing Local Competition	AT&T/WorldCom
Florida	Docket 95-0984-TP	Interconnection Terms and Prices	AT&T
Illinois	Docket 95-0458	Wholesale Local Services	WorldCom
California	Dockets R.95-04-043/044	Local Competition	WorldCom
Florida	Docket 95-0696-TP	Universal Service and Carrier of Last Resort Obligations	IXC Coalition
Georgia	Docket 5755-U	Access Reform	AT&T
South Carolina	Docket 95-720-C	Price Regulation	ACSI
Michigan	Case No. U-10860	Interconnection Agreement	WorldCom
Mississippi	Docket 95-US-313	Price Regulation Plan	WorldCom/AT&T
Missouri	Case TR-95-241	Expanded Local Calling	MCI
Washington	Docket UT-941464	Interconnection Complaint	IXC Coalition
Maryland	Case No. 8584 – Phase II	Introducing Local Competition	WorldCom
Massachusetts	DPU 94-185	Introducing IntraLATA and Local Competition	WorldCom
Wisconsin	Docket 6720-TI-111	IntraLATA Equal Access	Schneider Com.
North Carolina	Docket P-100, Sub 126	Expanded Local Calling	LDDS
Georgia	Docket 5319-U	IntraLATA Equal Access	MCI/LDDS
Mississippi	Docket 94-UA-536	Price/Incentive Regulation	LDDS
Georgia	Docket 5258-U	Price Regulation Plan	LDDS

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Florida	Docket 93-0330-TP	IntraLATA Equal Access	IXC Coalition
Alabama	Docket 23260	Access Transport Rate Structure	LDDS
New Mexico	Docket 94-204-TC	Access Transport Rate Structure	LDDS
Kentucky	Docket 91-121	Alternative Regulation Proposal	IXC Coalition
Texas	Docket 12784	Access Transport Rate Structure	IXC Coalition
Illinois	Docket 94-0096	Customer's First Proposal	LDDS
Louisiana	Docket U-17949-D	Alternative Regulation	IXC Coalition
New York	Case No. 93-C-0103	Rochester Plan-Wholesale/Retail	LDDS
Illinois	Dockets 94-0043/46	Access Transport Rate Structure	IXC Coalition
Florida	Docket 92-1074-TP	Expanded Interconnection	Intermedia
Louisiana	Docket U-20800	Access Transport Rate Structure	LDDS
Tennessee	Docket 93-008865	Access Transport Rate Structure	LDDS
Ohio	Docket 93-487-TP-ALT	Alternative Regulation	Allnet/LCI/LDDS
Mississippi	Docket 93-UN-0843	Access Transport Rate Structure	LDDS
South Carolina	Docket 93-756-C	Access Transport Rate Structure	IXC Coalition
Georgia	Docket 4817-U	Access Transport Rate Structure	IXC Coalition
Louisiana	Docket U-20710	Imputation Standards	LDDS
Ohio	Case 93-230-TP-ALT	Alternative Regulation	MCI/Allnet/LCI
New Mexico	Docket 93-218-TC	Expanded Local Calling	LDDS
Illinois	Docket 92-0048	Alternative Regulation	LDDS
Mississippi	Docket 93-UN-0038	Banded Rates for Toll Service	LDDS
Florida	Docket 92-1074-TP	Expanded Interconnection	Florida Coalition
Louisiana	Docket U-20237	Preferential Toll Pricing	IXC Coalition
South Carolina	Docket 93-176-C	Expanded Local Calling	LDDS & MCI
Mississippi	Case 89-UN-5453	Rate Stabilization Plan	LDDS & ATC
Illinois	Docket 92-0398	Local Interconnection	CLEC Coalition
Louisiana	Docket U-19993	Payphone Compensation	MCI
Maryland	Docket 8525	Payphone Compensation	MCI
South Carolina	Docket 92-572-C	Payphone Compensation	MCI


Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Georgia	Docket 4206-U	Payphone Compensation	MCI
Delaware	Docket 91-47	Application for Rate Increase	MCI
Florida	Docket 88-0069-TL	Comprehensive Price Review	Florida Coalition
Mississippi	Case 92-UA-100	Expanded Local Calling	LDDS & ATC
Florida	Docket 92-0188-TL	GTE Rate Case	MCI & FIXCA
Wisconsin	Docket 05-TI-119	IntraLATA Competition	MCI & Schneider
Florida	Docket 92-0399-TP	Payphone Compensation	MCI & FIXCA
California	Docket I,87-11-033	Alternative Regulation	Intellical
Florida	Docket 88-0068-TL	Rate Stabilization	Public Counsel and Large Users
New York	Case 28425, Phase III	Access Transport Rate Structure	Empire Altel
Wisconsin	Docket 05-TR-103	Intrastate Access Charges	MCI & CompTel
Mississippi	Docket 90-UA-0280	IntraLATA Competition	Intellicall
Louisiana	Docket U-17949	IntraLATA Competition	Cable & Wireless
Florida	Docket 88-0069-TL	Rate Stabilization	Florida Coalition
Wisconsin	Docket 05-TR-103	Intrastate Access Charges	Wisconsin IXCs
Florida	Docket 89-0813-TP	Alternative Access Providers	Florida Coalition
Alaska	Docket R-90-1	Intrastate Toll Competition	Telephone Utilities of Alaska
Minnesota	Docket P-3007/NA-89-76	Centralized Equal Access	MCI & Telecom*USA
Florida	Docket 88-0812-TP	IntraLATA Toll Competition	Florida Coalition
Wisconsin	Docket 05-TR-102	Intrastate Access Charges	Wisconsin IXCs
Wisconsin	Docket 6655-NC-100	Centralized Equal Access	Wisconsin IXCs
Florida	Docket 88-0069-TL	Rate Stabilization	Florida Coalition
Wisconsin	Docket 05-NC-100	IntraLATA Toll Competition	Wisconsin IXCs
Florida	Docket 87-0347-TI	AT&T Regulatory Relief	Florida Coalition
Illinois	Docket 83-0142	Intrastate Access Charges	Illinois Consolidated
Texas	Docket 8218	WATS Prorate Credit	TEXALTEL

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

State	Docket/Case	Topic	Sponsor(s)
Iowa	Case RPU 88-2	Centralized Equal Access	MCI & Teleconnect
Florida	Docket 87-1254-TL	Regulatory Flexibility for LECs	Microtel
Wisconsin	Docket 05-TR-5, Part B	IntraLATA Competition and Access Charges	Wisconsin State Telephone Assc.
Florida	Docket 86-0984, Phase II	Intrastate Loop Cost Recovery	Florida Coalition

Exhibit JPG-2
Intrastate Pricing Guide

				
AT&T One Rate® Plus				
AT&T Detariffed State Rate Table: CPM10-PKX-DD				
Effective Date: November 1, 2010				
The per-minute rates listed below apply in the following detariffed states for in-state direct dialed station calls: Rates apply 24 hours a day, seven days a week.				
Detariffed State	In-state Long Distance Rate Per Minute	Local Toll Rate Per Minute		
Alabama, Colorado, Georgia*, Indiana, Iowa, Kentucky, Louisiana, Maine, Michigan**, Mississippi, Montana, Nevada, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee*, Vermont, Washington, Wisconsin**, Wyoming	\$0.19	\$0.19		
California	California Residential Service Guides			
New Hampshire	New Hampshire Residential Rate Schedules			
* Calls which originate and terminate in the same county/lata will not incur usage charges and will be toll free.				
# Interlata Dial Station rates within 0-22 Miles and Intralata Dial Station rates within 0-16 Miles = \$0.0.				
** Detariffing for Michigan is January 5, 2011, Wisconsin is December 30, 2010				