

OHIO

- Ohio Bell Telephone Company
 - General rate proceeding Docket No. 79-1184-TP-AIR
 - General rate increase Docket No. 81-1433-TP-AIR
 - General rate increase Docket No. 83-300-TP-AIR
 - Access charges Docket No. 83-464-TP-AIR
- General Telephone of Ohio
 - General rate proceeding Docket No. 81-383-TP-AIR
- United Telephone Company
 - General rate proceeding Docket No. 81-627-TP-AIR

PENNSYLVANIA

- Bell Telephone Company of Pennsylvania
 - Alternative Regulation proceeding Docket No. P-00930715
 - Automatic Savings Docket No. R-953409
 - Rate Rebalance Docket No. R-00963550
- Enterprise Telephone Company
 - General rate proceeding Docket No. R-922317
- All companies
 - InterLATA Toll Service Invest. Docket No. I-910010
- GTE North and United Telephone Company
 - Local Calling Area Case Docket No. C-902815

SOUTH DAKOTA

- Northwestern Bell Telephone Company
 - General rate proceeding Docket No. F-3375

TENNESSEE

- (on behalf of Time Warner Communications)
- BellSouth Telephone Company
 - Avoidable costs case Docket No. 96-00067

UTAH

- U.S. West Communications (Mountain Bell Telephone Company)
 - General rate case Docket No. 84-049-01
 - General rate case Docket No. 88-049-07
 - 800 Services case Docket No. 90-049-05
 - General rate case/
incentive regulation Docket No. 90-049-06/90-
049-03
 - General rate case Docket No. 92-049-07
 - General rate case Docket No. 95-049-05

VIRGIN ISLANDS, U.S.

- Virgin Islands Telephone Company
 - General rate case Docket No. 264
 - General rate case Docket No. 277
 - General rate case Docket No. 314
 - General rate case Docket No. 316

VIRGINIA

- General Telephone Company of the South
Jurisdictional allocations Case No. PUC870029

WASHINGTON

- US West Communications, Inc.
 - General rate case Docket No. UT-950200
- All Companies- Analyzed the local calling
areas in the State

WISCONSIN

- Wisconsin Bell Telephone Company
 - Private line rate proceeding Docket No. 6720-TR-21
 - General rate proceeding Docket No. 6720-TR-34

EXHIBITS WWD-1 THROUGH WWD-6
CONTAIN INFORMATION CLAIMED TO BE PROPRIETARY
BY NYT. THEREFORE, THEY HAVE BEEN DELETED
FROM THIS COPY.

**UNITED TELEPHONE - SOUTHEAST
TIME WARNER DISCOVERY REQUEST
AVOIDED COST FOR RESALE
DOCKET 96-00067**

7. In her testimony at page 8, line 14, Ms Sykora discusses uncollectible revenues. In connection with this testimony, please provide the following:

A. All data which indicates United's or any of United affiliate's uncollectible percent pertaining to the provision of services to resellers.

Response: This information does not exist in that neither United nor any of its local telephone division affiliates are involved in the provision of services to resellers. See response to 7B for uncollectible information of resellers for Sprint Long Distance.

B. The percentage of uncollectibles that Sprint, as an IXC, has experienced on its interexchange services that are sold to resellers.

Response: As indicated in response to AT&T's Item 11, the testimony of Randy Farrar on behalf of Central Telephone Company of Illinois before the Illinois Commerce Commission on February 26, 1996, states that Sprint's Long Distance Division experienced 1994 reseller write-offs of 1.14%, unsubstantiated billing adjustments of 1.16%, and fraudulent code abuse of 0.13%, for a total of 2.43 % of reseller revenue.

MAR 19 1996

Exhibit WWD-8

Page 1 of 2

Decision 96-03-020 March 13, 1996

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the)
Commission's Own Motion Into)
Competition for Local Exchange)
Service.)

R.95-04-043
(Filed April 26, 1995)

Order Instituting Investigation)
on the Commission's Own Motion)
into Competition for Local Exchange)
Service.)

I.95-04-044
(Filed April 26, 1995)

(See Appendix A for appearances.)

viable resale market. On the other hand, if the adjustment for avoided retail costs is too large, the LECs will not be compensated for their true costs. Moreover, facilities-based CLCs could be placed at a competitive disadvantage in pricing their retail service if CLC resellers are able to purchase wholesale local exchange service below its cost.

The only parties to present quantifiable evidence regarding the magnitude of avoided retailing costs were AT&T/MCI through witness Lee Selwyn. However, parties' critique of Selwyn's methodology focuses on some key areas which we feel warrant examination, and we are not willing to adopt AT&T's proposal without modification. In the following section, we discuss the four major areas where we found AT&T's methodology to be flawed, and conclude with a description of how we have adjusted Selwyn's proposal to take those flaws into account in our own estimate of avoided retailing costs.

First, AT&T's model allocates 100% of uncollectible expenses to retail based on the assumption that any uncollectible expense is totally avoided at the wholesale level. On cross-examination, AT&T's witness Selwyn indicated that uncollectibles at the wholesale level would be nothing like those experienced at the retail level and therefore his assumption of zero was reasonable. (Tr. p. 2914.) In further cross-examination, Selwyn indicated that he was not familiar with Sonic Communications, Inc. While Selwyn may not be familiar with the name Sonic, our recent experience with Sonic and our recognition of the millions of dollars that company owed Pacific and GTEC when it went bankrupt are all too clear in our minds. We therefore cannot accept the assumption of zero uncollectibles at the wholesale level and have modified the model accordingly.

A second change comes in determining an allocation factor for marketing and customer services. During cross-examination, a number of parties questioned Selwyn on various subaccounts which

COMPANY: Rochester Telephone Corporation
 STUDY AREA: New York
 PERIOD: From Jan 1995 To Dec 1995
 COSA: RTNY

Exhibit WWD-9
 Page 1 of 2

TABLE I - REGULATED/NONREGULATED DATA
 (Dollars in Thousands)

Row/ Acct. Number	Account Title	Total	Direct	
			Regulated	Nonreg.
	(a)	(b)	(c)	(d)
5121	Subvce LD pvt ntwk	1,580	1,580	N/A
5122	Vce LD pvt network	1,249	1,249	N/A
5123	Audio LD pvt ntwk	0	0	N/A
5124	Vidio LD pvt ntwk	0	0	N/A
5125	Digital LD pvt ntwk	0	0	N/A
5126	LD pvt ntwk switch	0	0	N/A
5128	Other LD pvt ntwk	0	0	N/A
5129	Other LD pvt settle	0	0	N/A
5120	LD private network	2,829	2,829	N/A
5160	Other LD	596	596	N/A
5169	Other LD settlement	0	0	N/A
525	LD ntwk svcs rev	17,876	17,876	N/A
	Miscellaneous			
5230	Directory	31,213	31,213	0
5240	Rent	1,560	1,560	N/A
5250	Corporate operation	12	12	N/A
5261	Special billing arr	140	140	N/A
5262	Customer operations	1,470	1,470	N/A
5263	Plant operations	82	82	N/A
5264	Other incident reg	1,683	1,683	N/A
5269	Other settlements	1,365	1,365	N/A
5260	Misc. (Class a)	4,740	4,740	N/A
5270	Carrier bill & coll	6,847	6,847	N/A
5280	Nonregulated	20,064	N/A	20,064
5200	Miscellaneous	64,436	44,372	20,064
	Uncollectible revs			
5301	Uncollect-telecomm	2,562	2,385	177
5302	Uncollect-other	4	4	0
5300	Uncollectible rev	2,566	2,389	177
530	Net Revenues	314,771	294,884	19,887

COMPANY: ROCHESTER TELEPHONE CORPORATION
STUDY AREA: NEW YORK
PERIOD: From JAN 1995 To DEC 1995
COSA: RTNY

Approved by OMB
3060-0395
Expires 8/31/95
UNRESTRICTED VERSION
SUBMISSION 1
TABLE I
PAGE 17.1 OF 30.3

TABLE I - SEPARATIONS AND ACCESS TABLE
(Dollars in Thousands)

Row	Category (a)	Subject to			-----Common Line-----		
		Separations (b)	State (c)	Interstate (d)	Pay (e)	Inside Wire (f)	BFP (g)
V. Operating Revenues and Certain Income Accounts							
A. Operating Revenues							
1. Basic Local Service Revenues							
4000	Local PL-Broad 36	0	0	0	N/A	N/A	N/A
4001	FX-CCSA 36	0	0	0	N/A	N/A	N/A
4002	Wideband Msg&TWX 36	0	0	0	N/A	N/A	N/A
4003	#MOU 36	0	0	0	N/A	N/A	N/A
4004	All Other 36	158,787	158,787	0	N/A	N/A	N/A
4005	Tot Bas Lcl 36/69	158,787	158,787	0	N/A	N/A	N/A
2. Network Access Service Revenues							
4010	End User 36	29,836	N/A	29,836	N/A	N/A	N/A
4011	Switched Access 36	19,711	N/A	19,711	N/A	N/A	N/A
4012	Special Access 36	9,735	N/A	9,735	N/A	N/A	N/A
4013	State Access 36	18,104	18,104	N/A	N/A	N/A	N/A
4014	Tot Netwk Acc 36/69	77,386	18,104	59,282	N/A	N/A	N/A
3. Long Distance Message Service Revenues							
4020	Wideband Msg&TWX 36	0	0	0	N/A	N/A	N/A
4021	#MOU 36	0	0	0	N/A	N/A	N/A
4022	LD PL-Broad 36	0	0	0	N/A	N/A	N/A
4023	Other LD Msg 36	17,876	17,876	0	N/A	N/A	N/A
4024	Tot LD Msg 36/69	17,876	17,876	0	N/A	N/A	N/A
4. Miscellaneous Revenues							
4030	Directory 36	32,316	32,316	0	N/A	N/A	N/A
4031	Billing & Coll 36	7,243	4,611	2,632	N/A	N/A	N/A
4032	All Other Misc 36	4,813	4,401	412	N/A	N/A	N/A
4033	Tot Misc 36/69	44,372	41,328	3,044	N/A	N/A	N/A
5. Uncollectible Revenues							
4040	Uncollectible 36/69	2,388	1,689	699	N/A	N/A	N/A
4050	Tot Rev ls Unc36/69	296,033	234,406	61,627	N/A	N/A	N/A

THERE IS NO EXHIBIT WWD-10.

Case No. 95-C-0657 (et al)
Time Warner Comm.
William Dunkel
Witness: C. R. Curbelo
Date of Request: June 21, 1996

REQUEST NO. TW COMM-NYT-58:

What are the full responsibilities of a typical Product Manager?

RESPONSE

1. **REVENUE/RESOURCE REQUIREMENTS:** Develops product revenue commitments through unit forecasts and sales and promotion plans. Monitors monthly results and initiates corrective action, as required. Prepares, presents, and explains detailed product performance analyses. Prepares expense and capital budget.
2. **STRATEGIC DIRECTION:** Develops annual strategic and tactical product plans. Analyzes likely future environments, understands dynamic competitive marketplace, recognizes changing regulatory climate and incorporates the implications of each into the plan. Solves problems in the face changing markets, support systems, and regulatory conditions.
3. **PRODUCT PLANNING:** Integrates strategic and technology plans with customer needs. Directs 15-30 member interdepartmental team to complete critical activities necessary for successful product and/or product enhancement introduction and overall product lifecycle management. Produces and/or completes service and technical descriptions, model tariff, methods and procedures, and operational, costing, pricing, advertising, and promotion plans. Recommends technology selections.
4. **PRODUCT MANAGEMENT:** Completes all lifecycle management activities. Develops and executes action plans regarding product features, pricing, deployment plans, sale channel compensation incentives, and promotional programs. Partners with Market Management, Market Area operations and Sales Channels to optimize processes and methods and procedures to exceed customer expectations for quality service delivery, short intervals and competitive prices. Initiates tracking and conducts analyses to monitor product performance.
5. **STAKEHOLDER MANAGEMENT:** Develops marketing positions on product implementation and plans in accordance with federal/state regulatory issues. Interfaces frequently with Market Areas, regulatory commission staffs, funding sources, and technical/network staffs to foster acceptance and change. Prepares analyses and responds

Case No. 95-C-0657 (et al)

Time Warner Comm.

William Dunkel

Witness: C. R. Curbelo

Date of Request: June 21, 1996

REQUEST NO. TW COMM-NYT-58 - (Continued)

to docket, interrogatories, and field issues. Represents NYNEX at Bell Communications Research and industry forums. Resolves strategic and tactical issues with technology, vendors, and third parties.

EXHIBITS WWD-12 AND WWD-13
CONTAIN INFORMATION CLAIMED TO BE PROPRIETARY
BY NYT. THEREFORE, THEY HAVE BEEN DELETED
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EXHIBITS WWD-14 through WWD-16

**THESE SCHEDULES CONTAIN INFORMATION CLAIMED TO BE PROPRIETARY
BY RTC. THEREFORE, THEY HAVE BEEN DELETED FROM THIS COPY.**