

## SOUTHEAST REGION SUMMARY

Our survey of the southeastern U.S. covers ten markets (including the major markets of Miami and Tampa) in which PCS service has begun. The results are outlined in Figure 2.

The new entrant to this region is Aerial in Tampa.

In the Southeast, we have seen a tightening in the overall relative price comparisons among the mid-level and high-end plans, primarily driven by the cellular players' moderate discounting. Conversely, we have also seen Sprint PCS and Powertel discount their lower-end offerings much more aggressively than cellular. This has led to overall PCS discounts of 21.4%, 7.2%, and -1.8% (premium) on the low-end, mid-level, and high-end plans, respectively. Across the three plan sizes, overall wireless prices have declined 6.9% to 17.6% since June, with the most aggressive price declines in the high-end plan.

Key observations about pricing in southeastern markets (all price comparisons are relative to June's survey):

- In Greenville, 360° Communications has revamped its mid-level and high-end plans to better compete with BANM for the higher-minute users. Prices for the company's mid-level and high-end plans have fallen by 21.1% and 32.0% respectively, and the company's offerings are lower than BellSouth's PCS service by 2.7% to 25.7%.
- In its southeastern markets (Knoxville, Memphis, Raleigh, and Tampa), GTE has instituted new plans, reducing prices up to 65.1%. In most cases, GTE's service is priced comparably to or below the PCS providers' offerings. In Knoxville, GTE's service is less than half the price of that offered by BellSouth's PCS plans. In Tampa, GTE is priced up to 56.3% below Aerial, partly due to GTE's off-peak minute offering of unlimited service for \$5.
- In Jacksonville, PCS players, Powertel and PrimeCo, have reduced prices significantly, while cellular pricing has remained stable. Powertel's aforementioned dime-a-minute plans have resulting in price reductions on the low-end and high-end plans of 66.7% and 31.4%. PrimeCo has doubled the size of its 100-minute plan to 200 minutes and reduced the price from \$43 to \$25, reducing the price of the survey's low-end and mid-level plans up to 45.2%. Overall, these two players are offering their services at discounts to cellular of 64.6%, 59.6%, and 32.2% on the low-end, mid-level, and high-end plans, respectively.
- In Memphis, we have seen heavy discounting from all of the wireless service providers. On average, wireless prices have dropped 27.5% to 45.1% in this market. Cellular competitors, BellSouth and GTE, have dropped the price of their offerings 21.3% to 56.3%, with the heaviest discounting being on the higher-end plans. Powertel, with its dime-a-minute plans, has decreased the cost of low-end and high-end plans by 66.7% and 38.5%, respectively. The cellular companies' move has cut into Powertel's price advantage (particularly in the higher-usage plans), and GTE's high-end plan is actually less than Powertel's.
- In Miami, AT&T and PrimeCo have begun offering basket packages to augment subscribers' standard monthly service. AT&T is offering to existing customers 1,000 minutes for use anytime for \$100. PrimeCo is running an off-peak offering of 300 weekend minutes for \$5. The offering of these baskets has decreased prices on the higher-end plans up to 41.1%.
- In New Orleans, Sprint's 10¢-a-minute plans appear to have led PrimeCo and Radiofone to adjust their service offerings to remain competitive. PrimeCo has introduced new 500-minute and 1,200-minute plans in this market priced at 10¢-a-minute, resulting in a 36.8% and 56.2% reduction in the price of the survey's mid-level and high-end plans. Radiofone has halved the price of its 250-minute plan, from \$99 to \$50. BellSouth, the other incumbent cellular provider, has not adjusted prices significantly. Overall, wireless prices have fallen up to 27.7%, and the PCS plans are priced at discounts to cellular of 27.7% to 39.9%.

**FIGURE 4**  
**RELATIVE PRICE COMPARISONS - SOUTHEAST REGION**

	Charlotte	Greenville	Jacksonville	Knoxville	Memphis	Miami	Montgomery	New Orleans	Raleigh	Tampa	AVERAGE
<b>Discount: PCS A vs. Wireline Cellular</b>											
Lower-End Plan			80.8%		66.6%			35.4%		-28.4%	38.6%
Mid-Level Plan			66.7%		53.8%			59.6%		-42.9%	34.3%
High-End Plan			50.0%		12.7%			53.3%		-56.3%	15.0%
<b>Discount: PCS A vs. Non-Wireline Cellular</b>											
Lower-End Plan			78.8%		71.4%			20.0%		4.8%	43.8%
Mid-Level Plan			64.1%		14.3%			20.0%		40.5%	34.7%
High-End Plan			46.3%		-20.1%			17.2%		52.4%	23.9%
<b>Average Discount: PCS A vs. All Cellular</b>											
Lower-End Plan			79.8%		69.0%			27.7%		-11.8%	41.3%
Mid-Level Plan			65.4%		34.1%			39.8%		-1.2%	34.5%
High-End Plan			48.2%		-3.7%			35.2%		-1.9%	19.4%
<b>Discount: PCS B vs. Wireline Cellular</b>											
Lower-End Plan	-9.6%	-2.7%	31.9%	-37.0%		19.2%	68.2%	35.4%	-5.4%	-28.4%	18.2%
Mid-Level Plan	-29.2%	-15.8%	55.6%	-135.6%		36.6%	45.8%	49.5%	-16.0%	-85.7%	-10.5%
High-End Plan	-37.8%	-25.7%	19.2%	-138.0%		43.3%	4.9%	60.0%	-25.7%	-100.0%	-22.2%
<b>Discount: PCS B vs. Non-Wireline Cellular</b>											
Lower-End Plan	13.1%	4.4%	47.1%	10.7%		11.1%	67.7%	20.0%	-11.3%	4.8%	18.6%
Mid-Level Plan	9.9%	4.2%	52.1%	7.8%		37.8%	24.9%	0.1%	-44.9%	22.6%	17.7%
High-End Plan	7.0%	12.0%	13.2%	-6.7%		32.0%	-13.3%	29.0%	6.8%	39.0%	13.2%
<b>Average Discount: PCS B vs. All Cellular</b>											
Lower-End Plan	1.7%	0.8%	49.5%	-13.1%		15.2%	67.9%	27.7%	-8.3%	-11.8%	14.4%
Mid-Level Plan	-9.6%	-5.8%	53.8%	-63.9%		37.2%	35.4%	24.8%	-30.5%	-31.6%	1.1%
High-End Plan	-15.4%	-6.9%	16.2%	-72.3%		37.7%	-4.2%	44.5%	-9.5%	-30.5%	-4.5%
<b>Average Discount: All PCS vs. All Cellular</b>											
Lower-End Plan	1.7%	0.8%	64.6%	-13.1%	69.0%	15.2%	67.9%	27.7%	-8.3%	-11.8%	21.4%
Mid-Level Plan	-9.6%	-5.8%	59.6%	-63.9%	34.1%	37.2%	35.4%	32.3%	-30.5%	-16.4%	7.2%
High-End Plan	-15.4%	-6.9%	32.2%	-72.3%	-3.7%	37.7%	-4.2%	39.9%	-9.5%	-16.2%	-1.8%

**APPENDIX E  
WIRELESS PRICING COMPARISONS - SOUTHEAST REGION (CELLULAR WIRELINE)**

Area Company	Charlotte ALLTEL	Greenville 360 Comm.	Jacksonville BellSouth	Knoxville GTE	Memphis BellSouth	Miami BellSouth	Montgomery ALLTEL	New Orleans BellSouth	Raleigh 360 Comm.	Tampa GTE	AVERAGE
<b>LOW-END PLAN</b>											
Monthly Fee	\$34.95	\$24.95	\$51.99	\$35.00	\$29.95	\$51.99	\$24.95	\$61.95	\$24.95	\$35.00	
Bundled Minutes	80	60	145	250	100	145	75	120	60	250	
Price/Bundled Minute	\$0.44	\$0.42	\$0.36	\$0.14	\$0.30	\$0.36	\$0.33	\$0.52	\$0.42	\$0.14	
Price per Additional Minute	\$0.24	\$0.30	\$0.29	\$0.25	\$0.20	\$0.29	\$0.26	\$0.42	\$0.30	\$0.25	
Number of Additional Minutes Needed	20	40	-45	-150	0	-45	25	-20	40	-150	
Total Price for 100 Minutes	\$39.65	\$36.95	\$51.99	\$35.00	\$29.95	\$51.99	\$31.45	\$61.95	\$36.95	\$35.00	\$41.09
<b>MID-LEVEL PLAN</b>											
Monthly Fee	\$59.95	\$59.95	\$89.99	\$35.00	\$47.50	\$51.99	\$34.95	\$95.95	\$49.95	\$35.00	
Bundled Minutes	265	300	325	250	200	145	165	240	700	250	
Price/Bundled Minute	\$0.23	\$0.20	\$0.28	\$0.14	\$0.24	\$0.36	\$0.21	\$0.40	\$0.25	\$0.14	
Price per Additional Minute	\$0.22	\$0.25	\$0.28	\$0.25	\$0.35	\$0.29	\$0.24	\$0.30	\$0.25	\$0.25	
Number of Additional Minutes Needed	-15	-50	-75	0	50	105	85	10	50	0	
Total Price for 250 Minutes	\$59.95	\$59.95	\$89.99	\$35.00	\$65.00	\$82.44	\$55.35	\$98.95	\$62.45	\$35.00	\$64.41
<b>HIGH-END PLAN</b>											
Monthly Fee	\$134.95	\$139.95	\$239.99	\$100.00	\$137.50	\$239.99	\$99.95	\$269.95	\$139.95	\$55.00	
Bundled Minutes	1020	1300	1150	1400	1000	1150	850	900	1300	900	
Price/Bundled Minute	\$0.13	\$0.11	\$0.21	\$0.07	\$0.14	\$0.21	\$0.12	\$0.30	\$0.11	\$0.06	
Price per Additional Minute	\$0.21	\$0.21	\$0.24	\$0.13	\$0.28	\$0.24	\$0.18	\$0.30	\$0.21	\$0.25	
Number of Additional Minutes Needed	-20	-300	-150	-400	0	-150	150	100	-300	100	
Total Price for 1000 Minutes	\$134.95	\$139.95	\$239.99	\$100.00	\$137.50	\$239.99	\$126.20	\$299.95	\$139.95	\$80.00	\$163.85

\* Price per Additional Minute is a 50/50 blend of peak and off-peak prices. Digital pricing used when available.

**APPENDIX F  
WIRELESS PRICING COMPARISONS - SOUTHEAST REGION (CELLULAR NON-WIRELINE)**

Area Company	Charlotte BANM	Greenville BANM	Jacksonville AT&T	Knoxville US Cellular	Memphis GTE	Miami AT&T	Montgomery Palmer	New Orleans Radiolone	Raleigh GTE	Tampa AT&T	AVERAGE
<b>LOW-END PLAN</b>											
Monthly Fee	\$49.99	\$36.99	\$39.99	\$44.95	\$35.00	\$39.99	\$21.95	\$50.00	\$35.00	\$39.99	
Bundled Minutes	130	90	75	75	250	75	60	250	150	75	
Price/Bundled Minute	\$0.38	\$0.41	\$0.53	\$0.60	\$0.14	\$0.53	\$0.37	\$0.20	\$0.23	\$0.53	
Price per Additional Minute	\$0.30	\$0.27	\$0.29	\$0.35	\$0.25	\$0.29	\$0.23	\$0.35	\$0.35	\$0.29	
Number of Additional Minutes Needed	-30	10	25	25	-150	25	40	-150	-50	25	
Total Price for 100 Minutes	\$49.99	\$39.69	\$47.24	\$53.70	\$35.00	\$47.24	\$30.95	\$50.00	\$35.00	\$47.24	\$43.61
<b>MID-LEVEL PLAN</b>											
Monthly Fee	\$49.99	\$49.99	\$69.99	\$72.95	\$35.00	\$69.99	\$39.95	\$50.00	\$50.00	\$69.99	
Bundled Minutes	130	160	200	200	250	200	300	250	275	200	
Price/Bundled Minute	\$0.38	\$0.31	\$0.35	\$0.36	\$0.14	\$0.35	\$0.13	\$0.20	\$0.18	\$0.35	
Price per Additional Minute	\$0.30	\$0.25	\$0.27	\$0.33	\$0.25	\$0.28	\$0.15	\$0.35	\$0.35	\$0.28	
Number of Additional Minutes Needed	120	90	50	50	0	50	-50	0	-25	50	
Total Price for 250 Minutes	\$85.99	\$72.49	\$83.49	\$89.45	\$35.00	\$83.99	\$39.95	\$50.00	\$50.00	\$83.99	\$67.44
<b>HIGH-END PLAN</b>											
Monthly Fee	\$199.99	\$199.99	\$99.99	\$199.95	\$99.95	\$199.99	\$61.95	\$99.00	\$188.75	\$99.99	
Bundled Minutes	1300	1900	350	900	1400	1350	600	750	1200	350	
Price/Bundled Minute	\$0.15	\$0.11	\$0.29	\$0.22	\$0.07	\$0.15	\$0.10	\$0.13	\$0.16	\$0.29	
Price per Additional Minute	\$0.22	\$0.22	\$0.19	\$0.23	\$0.13	\$0.25	\$0.11	\$0.28	\$0.14	\$0.25	
Number of Additional Minutes Needed	-300	-900	650	100	-400	-350	400	250	-200	650	
Total Price for 1000 Minutes	\$199.99	\$199.99	\$223.49	\$222.95	\$99.95	\$199.99	\$105.95	\$169.00	\$188.75	\$262.49	\$187.26

\* Price per Additional Minute is a 50/50 blend of peak and off-peak prices. Digital pricing used when available.

**APPENDIX G  
WIRELESS PRICING COMPARISONS - SOUTHEAST REGION (PCS A BLOCK)**

Area Company	Charlotte AT&T	Greenville AT&T	Jacksonville PowerTel	Knoxville AT&T	Memphis PowerTel	Miami Sprint PCS	Montgomery Sprint PCS	New Orleans Sprint PCS	Raleigh AT&T	Tampa Aerial	AVERAGE
<b>LOW-END PLAN</b>											
Monthly Fee			\$10.00		\$10.00			\$40.00		\$44.95	
Bundled Minutes			100		100			400		150	
Price/Bundled Minute			\$0.10		\$0.10			\$0.10		\$0.30	
Price per Additional Minute			\$0.50		\$0.50			\$0.25		\$0.25	
Number of Additional Minutes Needed			0		0			300		50	
Total Price for 100 Minutes			\$10.00		\$10.00			\$40.00		\$44.95	\$26.24
<b>MID-LEVEL PLAN</b>											
Monthly Fee			\$30.00		\$30.00			\$40.00		\$50.00	
Bundled Minutes			300		300			400		500	
Price/Bundled Minute			\$0.10		\$0.10			\$0.10		\$0.10	
Price per Additional Minute			\$0.30		\$0.30			\$0.25		\$0.15	
Number of Additional Minutes Needed			50		50			150		250	
Total Price for 250 Minutes			\$30.00		\$30.00			\$40.00		\$50.00	\$37.50
<b>HIGH-END PLAN</b>											
Monthly Fee			\$60.00		\$60.00			\$60.00		\$50.00	
Bundled Minutes			600		600			600		500	
Price/Bundled Minute			\$0.10		\$0.10			\$0.10		\$0.10	
Price per Additional Minute			\$0.15		\$0.15			\$0.20		\$0.15	
Number of Additional Minutes Needed			400		400			400		500	
Total Price for 1000 Minutes			\$120.00		\$120.00			\$140.00		\$125.00	\$126.25

\* Price per Additional Minute is a 50/50 blend of peak and off-peak prices. Digital pricing used when available.

**APPENDIX H  
WIRELESS PRICING COMPARISONS - SOUTHEAST REGION (PCS B BLOCK)**

Area Company	Charlotte BellSouth	Greenville BellSouth	Jacksonville PrimeCo	Knoxville BellSouth	Memphis SBC	Miami PrimeCo.	Montgomery PowerTel	New Orleans PrimeCo.	Raleigh BellSouth	Tampa PrimeCo.	AVERAGE
<b>LOW-END PLAN</b>											
Monthly Fee	\$26.95	\$25.95	\$25.00	\$26.95		\$42.00	\$10.00	\$40.00	\$26.95	\$9.95	
Bundled Minutes	45	60	200	30		100	100	100	60	0	
Price/Bundled Minute	\$0.60	\$0.43	\$0.13	\$0.90		\$0.42	\$0.10	\$0.40	\$0.45	NMF	
Price per Additional Minute	\$0.30	\$0.30	\$0.30	\$0.30		\$0.21	\$0.50	\$0.15	\$0.30	\$0.35	
Number of Additional Minutes Needed	55	40	-100	70		0	0	0	40	100	
Total Price for 100 Minutes	\$43.45	\$37.95	\$25.00	\$47.95		\$42.00	\$10.00	\$40.00	\$38.95	\$44.95	\$36.69
<b>MID-LEVEL PLAN</b>											
Monthly Fee	\$44.95	\$36.95	\$25.00	\$64.95		\$47.00	\$30.00	\$49.95	\$54.95	\$65.00	
Bundled Minutes	120	120	200	180		225	300	500	180	500	
Price/Bundled Minute	\$0.37	\$0.31	\$0.13	\$0.36		\$0.21	\$0.10	\$0.10	\$0.31	\$0.13	
Price per Additional Minute	\$0.25	\$0.25	\$0.30	\$0.25		\$0.21	\$0.30	\$0.20	\$0.25	\$0.19	
Number of Additional Minutes Needed	130	130	50	70		25	-50	-250	70	-250	
Total Price for 250 Minutes	\$77.45	\$69.45	\$40.00	\$82.45		\$52.25	\$30.00	\$49.95	\$72.45	\$65.00	\$59.89
<b>HIGH-END PLAN</b>											
Monthly Fee	\$89.95	\$79.95	\$99.00	\$109.95		\$52.00	\$60.00	\$120.00	\$79.95	\$65.00	
Bundled Minutes	360	360	500	360		600	600	1200	360	500	
Price/Bundled Minute	\$0.25	\$0.22	\$0.20	\$0.31		\$0.09	\$0.10	\$0.10	\$0.22	\$0.13	
Price per Additional Minute	\$0.15	\$0.15	\$0.19	\$0.20		\$0.21	\$0.15	\$0.15	\$0.15	\$0.19	
Number of Additional Minutes Needed	640	640	500	640		400	400	-200	640	300	
Total Price for 1000 Minutes	\$185.95	\$175.95	\$194.00	\$237.95		\$136.00	\$120.00	\$120.00	\$175.95	\$160.00	\$167.31

\* Price per Additional Minute is a 50/50 blend of peak and off-peak prices. Digital pricing used when available.

*The Industry Analysis Division's*

# **Reference Book**

## **of Rates Price Indices and Household Expenditures for Telephone Service**

March 1997

Tracy Waldon  
James Lande

Industry Analysis Division  
Common Carrier Bureau  
Federal Communications Commission  
Washington, DC 20554

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This report is available for reference in the Common Carrier Bureau Public Reference Room, 2000 M Street, N.W., 5<sup>th</sup> Floor. Copies may be purchased by calling International Transcription Service, Inc. at (202) 857-8300. The report can also be downloaded from the FCC-State Link computer bulletin board at (202) 418-0241 or through the FCC-State Link on the Internet, accessible from the Common Carrier Bureau's Home Page at <http://www.fcc.gov/ccb/> on the World Wide Web.

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## Appendix 2: Residential Telephone Rates by City; October 1995

			Private line with unlimited rotary calling, SLCs, surcharges, and taxes		Rotary service connection, surcharges, and taxes		Additional charges for Touch-Tone Service		Least cost inside wiring maintenance plan
			Generally available rate	Subsidized rate	Generally available rate	Subsidized rate	Monthly Service	Connection Charge	
AL	Huntsville	Bell South	\$23.01	\$15.32	\$42.68	\$21.34			\$1.50
AK	Anchorage	Anchorage	\$14.47	\$7.22	\$25.50				\$1.50
AZ	Tucson	U.S. West	\$19.17	\$13.79	\$51.74	\$17.08			\$1.25
AR	West Memphis	Southwestern Bell	\$28.42	\$8.35	\$44.54	\$22.27			\$2.25
	Pine Bluff	Southwestern Bell	\$21.96	\$9.10	\$43.92	\$21.96			\$2.25
CA	Anaheim	Pac. Telesis	\$15.49	\$5.90	\$35.19	\$10.13			\$0.50
	Bakersfield	Pac. Telesis	\$15.49	\$5.90	\$35.19	\$10.13			\$0.50
	Fresno	Pac. Telesis	\$15.49	\$5.90	\$35.19	\$10.13			\$0.50
	Long Beach	GTE	\$23.53	\$11.76	\$45.73	\$22.87			\$0.95
	Los Angeles	Pac. Telesis	\$16.97	\$6.47	\$35.19	\$10.13			\$0.50
	Oakland	Pac. Telesis	\$16.60	\$6.33	\$35.19	\$10.13			\$0.50
	Salinas	Pac. Telesis	\$16.38	\$6.24	\$35.19	\$10.13			\$0.50
	San Bernardino	GTE	\$23.21	\$11.60	\$45.73	\$22.87			\$0.95
	San Diego	Pac. Telesis	\$15.49	\$5.90	\$35.19	\$10.13			\$0.50
	San Francisco	Pac. Telesis	\$15.49	\$5.90	\$35.19	\$10.13			\$0.50
	San Jose	Pac. Telesis	\$16.23	\$6.18	\$35.19	\$10.13			\$0.50
CO	Boulder	U.S. West	\$21.61	\$13.57	\$37.45	\$18.73			\$1.95
	Col. Springs	U.S. West	\$19.78	\$12.24	\$36.40	\$18.20			\$1.95
	Denver	U.S. West	\$21.21	\$13.18	\$37.56	\$18.78			\$1.95
CT	Ansonia	SNET	\$18.70	\$9.96	\$47.70	\$23.85			\$1.35
	Norwalk	SNET	\$17.60	\$8.87	\$47.70	\$23.85			\$1.35
DC	Washington	Bell Atlantic	\$19.50	\$8.81	\$30.76	\$15.38	\$0.70		\$1.25
FL	Miami	Bell South	\$16.96	\$8.94	\$40.00	\$20.00			\$2.50
	Tampa	GTE	\$17.61	\$7.78	\$62.98	\$31.49			\$1.00
	W. Palm Beach	Bell South	\$15.65	\$7.78	\$40.00	\$20.00			\$2.50
GA	Albany	Bell South	\$19.15	\$11.51	\$42.50		\$1.30		\$2.00
	Atlanta	Bell South	\$23.32	\$15.60	\$42.50		\$1.30		\$2.00
HI	Honolulu	GTE	\$19.58	\$11.95	\$45.50	\$22.75			\$1.50
IL	Chicago	Ameritech	\$17.21		\$60.56	\$30.28			\$2.50
	Decatur	Ameritech	\$20.19		\$60.64	\$30.32			\$2.50
	Rock Island	Ameritech	\$20.76		\$60.64	\$30.32			\$2.50
IN	Indianapolis	Ameritech	\$19.77		\$47.00	\$23.50			\$2.00
	Terre Haute	GTE	\$22.13		\$60.06	\$30.03	\$0.80		\$1.50
IA	Fort Dodge	Contel	\$14.03		\$9.82	\$4.34			\$1.25
KY	Louisville	Bell South	\$22.65		\$34.50	\$17.25	\$1.00		\$2.00
LA	Baton Rouge	Bell South	\$20.99		\$44.63	\$22.32	\$0.09		\$2.00
	New Orleans	Bell South	\$20.02		\$44.29	\$22.15	\$0.09		\$2.00
ME	Portland	NYNEX	\$17.99	\$10.35	\$47.44	\$10.60			\$0.75
MD	Baltimore	Bell Atlantic	\$24.88		\$48.00	\$24.00			\$0.85
MA	Boston	NYNEX	\$22.01	\$11.73	\$38.92	\$19.47	\$0.98		\$0.95
	Hyannis	NYNEX	\$22.01	\$11.73	\$38.92	\$19.47	\$0.98		\$0.95
	Springfield	NYNEX	\$22.01	\$11.73	\$38.92	\$19.47	\$0.98		\$0.95
MI	Detroit	Ameritech	\$16.71	\$12.13	\$44.52	\$22.26	\$2.43		\$2.25
	Grand Rapids	Ameritech	\$15.40	\$11.03	\$44.52	\$22.26	\$2.43		\$2.25
	Saginaw	Ameritech	\$16.19	\$11.82	\$44.52	\$22.26	\$2.43		\$2.25
MN	Detroit Lakes	U.S. West	\$18.57	\$10.90	\$16.25	\$8.13	\$1.20	\$2.50	\$1.95
	Minneapolis	U.S. West	\$20.39	\$12.67	\$16.25	\$8.13	\$1.20	\$2.50	\$1.95
MI	Pascagoula	Bell South	\$24.93		\$49.22	\$24.61	\$1.30		\$2.00
MO	Kansas City	Southwestern Bell	\$18.12	\$9.64	\$42.47	\$21.24			\$3.00
	Mexico	Southwestern Bell	\$16.91	\$7.59	\$41.70	\$20.85			\$3.00
	St. Louis	Southwestern Bell	\$18.18	\$9.67	\$43.06	\$21.53			\$3.00
MT	Butte	U.S. West	\$18.22	\$11.01	\$25.00	\$12.50			\$1.95
NE	Grand Island	U.S. West	\$21.81		\$30.52	\$15.26			\$1.95
NJ	Phillipsburg	Bell Atlantic	\$11.96		\$44.52	\$22.26	\$0.99		\$1.25
NM	Alamogordo	U.S. West	\$20.77	\$10.14	\$31.96	\$7.99			\$1.95
NY	Binghamton	NYNEX	\$26.22	\$14.51	\$62.71	\$11.40			\$0.52

**Appendix 2: Residential Telephone Rates by City; October 1995**

			Private line with unlimited rotary calling, SLCs, surcharges, and taxes		Rotary service connection, surcharges, and taxes		Additional charges for Touch-Tone Service		Least cost inside wiring maintenance plan
			Generally available rate	Subsidized rate	Generally available rate	Subsidized rate	Monthly Service	Connection Charge	
NY	Buffalo	NYNEX	\$30.88	\$18.96	\$63.83	\$11.61			\$0.52
	Massena	NYNEX	\$23.60	\$11.97	\$62.34	\$11.33			\$0.52
	New York City	NYNEX	\$25.28	\$15.53	\$64.29	\$11.69			\$0.52
	Ogdensburg	NYNEX	\$24.26	\$12.29	\$64.09	\$11.65			\$0.52
	Rochester	Rochester	\$16.81	\$13.03	\$33.32	\$10.00			\$1.99
NC	Raleigh	Bell South	\$17.21	\$9.79	\$44.03	\$22.02	\$0.50		\$2.50
	Rockingham	Bell South	\$15.67	\$8.24	\$44.03	\$22.02	\$0.50		\$2.50
OH	Canton	Ameritech	\$19.18	\$10.94	\$36.50	\$0.00	\$0.80		\$2.00
	Cincinnati	Cin. Bell	\$20.28		\$25.70		\$0.82	\$6.00	\$1.50
	Cleveland	Ameritech	\$19.18	\$10.94	\$36.50	\$0.00	\$0.80		\$2.00
	Columbus	Ameritech	\$19.18	\$10.94	\$36.50	\$0.00	\$0.80		\$2.00
	Toledo	Ameritech	\$19.18	\$10.94	\$36.50	\$0.00	\$0.80		\$2.00
OR	Corvallis	U.S. West	\$18.84	\$11.42	\$12.00	\$6.00			
	Portland	U.S. West	\$22.12	\$14.05	\$12.00	\$6.00			
PA	Allentown	Bell Atlantic	\$16.62		\$40.00	\$20.00	\$0.94		\$1.25
	Ellwood City	Bell Atlantic	\$15.75		\$40.00	\$20.00	\$0.94		\$1.25
	Johnstown	GTE	\$20.05		\$55.86	\$27.93	\$1.50		\$1.50
	New Castle	Bell Atlantic	\$14.00		\$40.00	\$20.00	\$0.94		\$1.25
	Philadelphia	Bell Atlantic	\$18.87		\$40.00	\$20.00	\$0.94		\$1.25
	Pittsburgh	Bell Atlantic	\$17.71		\$40.00	\$20.00	\$0.94		\$1.25
	Scranton	Bell Atlantic	\$16.62		\$40.00	\$20.00	\$0.94		\$1.25
RI	Providence	NYNEX	\$23.47	\$15.34	\$36.20	\$18.10			\$0.95
SC	Beaufort	United	\$19.76		\$32.30	\$16.15			\$1.25
TN	Memphis	Bell South	\$18.66		\$47.39	\$23.69	\$1.50		\$1.25
	Nashville	Bell South	\$17.72		\$45.13	\$22.57	\$1.50		\$1.25
TX	Brownsville	Southwestern Bell	\$15.05	\$6.48	\$44.40	\$22.20	\$0.18	\$2.35	\$2.50
	Corpus Christi	Southwestern Bell	\$15.59	\$7.21	\$44.55	\$22.28	\$0.18	\$2.35	\$2.50
	Dallas	Southwestern Bell	\$17.66	\$9.09	\$45.59	\$22.80	\$0.18	\$2.35	\$2.50
	Fort Worth	Southwestern Bell	\$16.46	\$7.83	\$45.14	\$22.57	\$0.18	\$2.35	\$2.50
	Houston	Southwestern Bell	\$18.15	\$9.42	\$45.60	\$22.81	\$0.18	\$2.35	\$2.50
	San Antonio	Southwestern Bell	\$16.29	\$7.75	\$44.58	\$22.29	\$0.18	\$2.35	\$2.50
UT	Logan	U.S. West	\$15.96	\$7.85	\$19.90	\$9.95			\$1.95
VA	Richmond	Bell Atlantic	\$23.96	\$3.88	\$38.50	\$19.25			\$0.85
	Smithfield	Continental	\$14.64	\$6.71	\$29.25	\$14.63	\$2.00		\$1.50
WA	Everett	GTE	\$18.91	\$11.14	\$42.08	\$15.65			\$1.50
	Seattle	U.S. West	\$16.45	\$11.39	\$32.98	\$16.49			\$1.95
WV	Huntington	Bell Atlantic	\$27.15	\$6.66	\$42.00		\$1.50		\$0.85
WI	Milwaukee	Ameritech	\$15.90	\$15.90	\$34.87	\$0.00			\$2.50
	Racine	Ameritech	\$15.86	\$15.86	\$34.70	\$0.00			\$2.50

\* The measured service rate plus 100 five minute, same zone, business day calls is shown because unlimited local service is not offered.

### Appendix 3: Business Telephone Rates by City; October 1995

			Additional Single Line Business rates						
			Representative Touch-Tone Line, including SLCs, surcharges, and taxes			Additional Charges for Touch-Tone			
			Single Business Line	Key System Line	PBX Line	Connection for one touch-tone line, including taxes and surcharges	Monthly Charge	Connection Charge	Least Cost Inside Wiring Maintenance Plan
AL	Huntsville	Bell South	\$56.01	\$73.60	\$73.60	\$73.62			\$1.50
AK	Anchorage	Anchorage	\$31.05	\$41.13	\$41.13	\$30.75			\$1.50
AZ	Tucson	U.S. West	\$41.69	\$53.75	\$59.98	\$62.47			\$2.00
AR	West Memphis	Southwestern Bell	\$53.42	\$65.68	\$65.68	\$94.24			\$2.75
	Pine Bluff	Southwestern Bell	\$40.72	\$51.01	\$51.01	\$92.94			\$2.75
CA	Anaheim	Pac. Telesis	**	\$30.35	\$32.04	\$32.04	\$71.64		\$1.00
	Bakersfield	Pac. Telesis	**	\$30.98	\$32.67	\$32.67	\$71.64		\$1.00
	Fresno	Pac. Telesis	**	\$30.98	\$32.67	\$32.67	\$71.64		\$1.00
	Long Beach	GTE	**	\$43.93	\$46.76	\$52.24	\$84.33		\$1.95
	Los Angeles	Pac. Telesis	**	\$33.25	\$35.10	\$35.10	\$71.64		\$1.00
	Oakland	Pac. Telesis	**	\$32.53	\$34.33	\$34.33	\$71.64		\$1.00
	Salinas	Pac. Telesis	**	\$32.87	\$34.65	\$34.65	\$71.64		\$1.00
	San Bernadino	GTE	**	\$43.34	\$46.13	\$51.54	\$84.33		\$1.95
	San Diego	Pac. Telesis	**	\$30.35	\$32.04	\$32.04	\$71.64		\$1.00
	San Francisco	Pac. Telesis	**	\$32.53	\$34.33	\$34.33	\$71.64		\$1.00
	San Jose	Pac. Telesis	**	\$31.80	\$33.57	\$33.57	\$71.64		\$1.00
CO	Boulder	U.S. West		\$47.26	\$54.79	\$58.73	\$74.91		\$2.75
	Col. Springs	U.S. West		\$43.82	\$50.88	\$54.56	\$72.80		\$2.75
	Denver	U.S. West		\$46.79	\$54.31	\$58.23	\$75.11		\$2.75
CT	Ansonia	SNET		\$43.70	\$49.53	\$49.53	\$68.90		\$2.65
	Norwalk	SNET		\$40.86	\$46.69	\$46.69	\$68.90		\$2.65
DC	Washington	Bell Atlantic	**	\$33.61	\$33.99	\$34.21	\$66.03	\$2.06	\$3.00
FL	Miami	Bell South		\$40.74	\$56.60	\$81.59	\$60.20		\$2.50
	Tampa	GTE		\$37.83	\$48.71	\$65.38	\$78.89		\$1.00
	W. Palm Beach	Bell South		\$37.43	\$52.18	\$75.16	\$59.92		\$2.50
GA	Albany	Bell South		\$39.67	\$60.12	\$63.03	\$52.25	\$2.30	\$2.00
	Atlanta	Bell South		\$58.76	\$89.42	\$93.28	\$52.25	\$2.32	\$2.00
HI	Honolulu	GTE		\$44.40	\$56.43	\$69.15	\$47.50	\$2.16	\$1.75
IL	Chicago	Ameritech	**	\$32.04	\$32.75	\$32.75	\$57.64		\$1.50
	Decatur	Ameritech	**	\$35.98	\$36.69	\$36.69	\$57.72		\$2.50
	Rock Island	Ameritech	**	\$36.55	\$37.26	\$37.26	\$57.72		\$2.50
IN	Indianapolis	Ameritech		\$55.92	\$62.49	\$62.49	\$59.00		\$1.50
	Terre Haute	GTE		\$44.16	\$65.88	\$65.88	\$68.78	\$1.60	\$1.50
IA	Fort Dodge	Contel		\$22.42	\$29.34	\$37.29	\$15.65		\$0.85
KY	Louisville	Bell South		\$61.12	\$93.47	\$93.47	\$47.50	\$3.09	\$2.00
LA	Baton Rouge	Bell South		\$47.68	\$73.56	\$73.56	\$88.23	\$0.18	\$2.00
	New Orleans	Bell South		\$48.17	\$73.83	\$73.83	\$87.55	\$0.18	\$2.00
ME	Portland	NYNEX		\$38.63	\$43.26	\$62.35	\$59.36		\$1.95
MD	Baltimore	Bell Atlantic	**	\$43.50	\$46.12	\$46.12	\$98.50		\$1.00
MA	Boston	NYNEX	**	\$42.81	\$45.21	\$47.99	\$97.67	\$1.46	\$1.95
	Hyannis	NYNEX	**	\$46.91	\$49.31	\$72.87	\$97.67	\$1.46	\$1.95
	Springfield	NYNEX	**	\$38.92	\$41.31	\$44.09	\$97.67	\$1.46	\$1.95
MI	Detroit	Ameritech	**	\$37.30	\$39.34	\$40.66	\$44.52	\$2.50	\$2.25
	Grand Rapids	Ameritech	**	\$35.57	\$37.52	\$38.79	\$44.52	\$2.50	\$2.25
	Saginaw	Ameritech	**	\$37.47	\$39.42	\$40.69	\$44.52	\$2.50	\$1.95
MN	Detroit Lakes	U.S. West		\$42.40	\$49.32	\$51.63	\$49.50	\$2.20	\$4.50
	Minneapolis	U.S. West		\$54.96	\$61.91	\$64.91	\$49.50	\$2.20	\$4.50
MI	Pascagouia	Bell South		\$56.21	\$82.55	\$82.55	\$71.69	\$3.00	\$2.00
MO	Kansas City	Southwestern Bell		\$45.48	\$60.66	\$60.66	\$61.44		\$3.25
	Mexico	Southwestern Bell		\$35.55	\$47.93	\$47.93	\$59.70		\$3.25

### Appendix 3: Business Telephone Rates by City; October 1995

		Additional Single Line Business rates						
		Representative Touch-Tone Line, including SLCs, surcharges, and taxes					Additional Charges for Touch-Tone	
		Single Business Line	Key System Line	PBX Line	Connection for one touch-tone line, including taxes and surcharges	Monthly Charge	Connection Charge	Least Cost Inside Wiring Maintenance Plan
MO	St. Louis	Southwestern Bell	\$45.15	\$60.22	\$60.22	\$61.63		\$3.25
MT	Butte	U.S. West	\$43.82	\$54.63	\$54.63	\$61.40		\$2.75
NE	Grand Island	U.S. West	\$47.80	\$59.81	\$68.17	\$49.05		\$2.00
NJ	Phillipsburg	Bell Atlantic	\$27.60	\$27.42	\$27.42	\$79.50	\$1.99	\$0.95
NM	Alamogordo	U.S. West	\$56.15	\$68.13	\$68.13	\$57.47		\$2.75
NY	Binghamton	NYNEX	\$49.99	\$52.92	\$53.21	\$120.92	\$1.37	\$5.71
	Buffalo	NYNEX	\$50.87	\$53.86	\$54.16	\$123.08	\$1.40	\$5.71
	Massena	NYNEX	\$49.70	\$52.61	\$52.90	\$120.20	\$1.38	\$5.71
	New York City	NYNEX	\$51.23	\$54.24	\$54.54	\$123.95	\$1.40	\$5.71
	Ogdensburg	NYNEX	\$51.08	\$54.08	\$54.37	\$123.58	\$1.38	\$5.71
	Rochester	Rochester	\$48.44	\$54.39	\$54.39	\$55.56	\$3.87	\$2.50
NC	Raleigh	Bell South	\$41.53	\$30.61	\$72.75	\$64.38	\$1.50	\$2.50
	Rockingham	Bell South	\$36.09	\$54.59	\$62.75	\$64.38	\$1.50	\$2.50
OH	Canton	Ameritech	\$44.25	\$50.29	\$54.26	\$62.85		\$2.00
	Cincinnati	Cin. Bell	\$52.99	\$70.26	\$70.26	\$55.78	\$1.69	\$6.00
	Cleveland	Ameritech	\$43.22	\$49.26	\$53.23	\$62.85		\$2.00
	Columbus	Ameritech	\$43.22	\$49.26	\$53.23	\$62.85		\$2.00
	Toledo	Ameritech	\$44.25	\$50.29	\$54.26	\$62.85		\$2.00
OR	Corvallis	U.S. West	\$37.10	\$45.33	\$45.33	\$31.00		\$2.00
	Portland	U.S. West	\$42.84	\$51.79	\$51.79	\$31.00		\$2.00
PA	Allentown	Bell Atlantic	\$37.28	\$37.03	\$38.77	\$79.50	\$1.80	\$0.95
	Eliwood City	Bell Atlantic	\$36.54	\$38.47	\$40.22	\$79.50	\$1.90	\$1.50
	Johnstown	GTE	\$37.28	\$40.37	\$41.99	\$60.44	\$2.48	\$1.50
	New Castle	Bell Atlantic	\$38.84	\$38.47	\$40.22	\$79.50	\$1.90	\$1.50
	Philadelphia	Bell Atlantic	\$30.64	\$30.28	\$32.02	\$79.50	\$1.90	\$1.50
	Pittsburgh	Bell Atlantic	\$31.67	\$31.31	\$33.05	\$79.50	\$1.90	\$1.50
	Scranton	Bell Atlantic	\$36.00	\$35.74	\$37.49	\$79.50	\$1.80	\$1.50
RI	Providence	NYNEX	\$43.59	\$45.17	\$45.17	\$46.50		\$1.95
SC	Beaufort	United	\$38.04	\$58.04	\$66.61	\$35.60		\$1.25
TN	Memphis	Bell South	\$54.84	\$92.81	\$92.81	\$66.80	\$3.15	\$1.25
	Nashville	Bell South	\$52.30	\$88.46	\$88.46	\$63.62	\$3.00	\$1.25
TX	Brownsville	Southwestern Bell	\$31.13	\$38.65	\$47.76	\$69.06	\$1.30	\$2.35
	Corpus Christi	Southwestern Bell	\$31.74	\$39.15	\$48.36	\$69.29	\$1.30	\$2.35
	Dallas	Southwestern Bell	\$38.35	\$47.17	\$60.02	\$70.91	\$1.30	\$2.35
	Fort Worth	Southwestern Bell	\$34.39	\$42.53	\$53.00	\$70.21	\$1.30	\$2.35
	Houston	Southwestern Bell	\$41.22	\$50.76	\$65.41	\$70.93	\$1.30	\$2.35
	San Antonio	Southwestern Bell	\$34.03	\$42.08	\$52.45	\$69.34	\$1.30	\$2.35
UT	Logan	U.S. West	\$32.13	\$40.65	\$58.35	\$53.06		\$2.75
VA	Richmond	Bell Atlantic	\$75.13	\$79.70	\$119.35	\$64.00	\$1.91	\$3.00
	Smithfield	Continental	\$29.97	\$45.87	\$60.76	\$29.25	\$2.00	\$1.75
WA	Everett	GTE	\$39.92	\$59.48	\$59.48	\$57.19		\$1.75
	Seattle	U.S. West	\$37.23	\$55.38	\$55.38	\$55.25		\$2.00
WV	Huntington	Bell Atlantic	\$73.37	\$77.67	\$114.59	\$96.90	\$2.75	\$3.00
WI	Milwaukee	Ameritech	\$37.50	\$39.05	\$39.05	\$68.21		\$1.75
	Racine	Ameritech	\$39.14	\$40.68	\$40.68	\$67.88		\$1.50

\*\* The measured service rate plus 200 five minute, same zone, business day calls is shown because unlimited local service is not offered.

80000 SERIES  
10% P.C.W.



**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of:

Application by BellSouth Corporation,	)	
BellSouth Telecommunications, Inc., and	)	CC Docket No. 97-231
BellSouth Long Distance, Inc., for	)	
Provision of In-Region, InterLATA	)	
Service in Louisiana	)	

**AFFIDAVIT OF MELISSA L. CLOSZ  
ON BEHALF OF SPRINT COMMUNICATIONS COMPANY, L.P.**

I, Melissa L. Closz, being first duly sworn upon oath, hereby depose and state as follows:

1. My name is Melissa L. Closz. My business address is 151 Southall Lane, Maitland, Florida 32751. I am employed by Sprint Communications Company L. P. ("Sprint") as Director-Local Market Development. My present responsibilities include representation of Sprint in interconnection negotiations with BellSouth Telecommunications, Inc. ("BellSouth"). In addition, I am responsible for coordinating Sprint's entry into the local markets within BellSouth's states. I also interface with BellSouth's account team supporting Sprint to communicate service and operational issues and requirements.

**Education and Professional Experience**

2. I have a Master of Business Administration degree from Georgia State University in Atlanta, Georgia and a Bachelor of Business Administration degree from Texas Christian University in Fort Worth, Texas. I have been employed by Sprint for over six years and have been in

my current position since February, 1997. I began my telecommunications career in 1983 when I joined AT&T Long Lines progressing through various sales and sales management positions. In 1989, I joined Sprint's Long Distance Division as Group Manager, Market Management and Customer Support in Sprint's Intermediaries Marketing Group. In this capacity, I was responsible for optimizing revenue growth from products and promotions targeting association member benefit programs, sales agents and resellers. I owned and operated a consumer marketing franchise in 1991 and 1992 before accepting the General Manager position for Sprint's Florida unit of United Telephone Long Distance (UTLD). In this role, I directed marketing and sales, operational support and customer service for this long distance resale operation. In Sprint's Local Telecommunications Division, in 1993, I was charged with establishing the Sales and Technical Support organization for Carrier and Enhanced Service Markets. My team interfaced with interexchange carriers, wireless companies and competitive access providers. After leading the business plan development for Sprint Metropolitan Networks, Inc. ("SMNI"), I became General Manager in 1995. In this capacity I directed the business deployment effort for Sprint's first CLEC operation, including its network infrastructure, marketing and product plans, sales management and all aspects of operational and customer support.

**Purpose of Affidavit**

3. The purpose of this affidavit is to provide input to the Federal Communications Commission ("FCC") on issues relevant to BellSouth's application for provision of in-region, interLATA services in Louisiana. Sprint's perspective is that of a competitive local exchange carrier

("CLEC") working to achieve operational readiness for local market entry in Louisiana.

Accordingly, I will discuss issues relevant to BellSouth's ability to provide nondiscriminatory access to operational support systems, Sprint's operational experience as a CLEC in Florida, as well as the role that performance measurements must play in documenting BellSouth's ability to meet its parity and nondiscrimination obligations.

#### **Status of Sprint-BellSouth Interconnection Agreement**

4. Sprint is in the process of negotiating its interconnection agreement with BellSouth in Louisiana. Sprint has completed interconnection agreements with BellSouth in Florida, Georgia, North Carolina and Tennessee and is continuing negotiations in all remaining states in which BellSouth provides local exchange service. Sprint is also working to achieve operational readiness for local market entry in Louisiana and all other states served by BellSouth.

#### **Sprint's CLEC Experience in BellSouth Service Area**

5. Sprint Metropolitan Networks, Inc. ("SMNI"), is operating as a CLEC in BellSouth territory in Orlando, Florida.<sup>1</sup> SMNI began operations subsequent to passage of Florida's Telecommunications Reform Act in May, 1995, and has been providing local exchange services to business customers since July, 1996.
6. SMNI operates as a facilities-based CLEC with its own central office switch located in downtown Orlando. It has a fiber optic backbone network which connects fiber facilities deployed in several commercial business parks and provides for interconnection to the

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<sup>1</sup> SMNI was merged into Sprint Communications Company L.P., effective October 1, 1997.

incumbent local exchange carriers (“ILECs”) serving the Metropolitan Orlando area. SMNI markets a broad range of local exchange services to business customers and provisions those services through a combination of direct fiber connections to commercial facilities and services leased from BellSouth. Services leased from BellSouth include local loops, interim local number portability, interconnection trunking and interoffice trunking.

7. SMNI began ordering and provisioning unbundled loops from BellSouth in May, 1996, and activated its first business customer in July, 1996. SMNI has endured ongoing operational problems with respect to securing unbundled network elements from BellSouth, including local loops and interim number portability.
8. Sprint’s experiences in Florida are relevant to the Commission’s consideration of BellSouth’s application for in-region, interLATA authorization in Louisiana because the processes and systems used by BellSouth in support of unbundled network elements are consistent across BellSouth’s nine-state region. This means that the underlying process issues that have negatively impacted SMNI in Florida will also impact CLECs’ ability to secure unbundled network elements from BellSouth in Louisiana. In fact, there is no reason whatsoever to believe that CLECs utilizing unbundled network elements from BellSouth in Louisiana would have any different, or better, experience than the SMNI experience in Florida.

#### **Operational Support Systems and Parity**

9. The competitive checklist in Section 271(c) of the Telecommunications Act of 1996 (‘Act’) includes nondiscriminatory access to network elements. Operational support systems

("OSS") have been defined as a network element by the FCC in its First Report and Order in CC Docket No. 96-98 (issued August 8, 1996). More specifically, BellSouth has an obligation to provide new entrants nondiscriminatory access to the systems utilized for the various OSS functions including Pre-Order, Ordering & Provisioning, Maintenance, Usage and Billing.

10. "Pre-Order" can be described as preparatory work necessary to submit an accurate and complete order. Pre-Order includes information such as address verification, services & features availability, telephone number assignment, dispatch scheduling, establishment of due date, and access to customer service records. This information is obtained from the ILEC's OSS platforms.
11. "Ordering & Provisioning" is the function of actually submitting a request into the incumbent LEC's OSS for a set of products, services, and/or unbundled elements so that service can be provisioned. Provisioning is the process of implementing an order for telecommunications service. This includes the exchange of information including order verification, firm order confirmation ("FOC"), service order status, jeopardy reporting, and order completion.
12. "Maintenance" is the function utilized by the CLEC to report and monitor problems with services provided by the ILEC. It includes generation of trouble reports, troubleshooting, status updates, and reporting.
13. "Usage" is the function where the ILEC sends to the CLEC the call detail records necessary for the CLEC to bill its end users. An example of this is the call detail records created when a CLEC end user makes a telephone call.

14. "Billing" is the function whereby the ILEC collects, records and submits information in the form of call detail records to the CLEC for the services the ILEC has provided to the CLEC, i.e., the wholesale invoice for services resold by the CLEC.
15. All of these functions are critical in providing service to customers in competition with ILECs. It is imperative that CLECs are provided nondiscriminatory access to the ILEC's OSS databases.
16. Nondiscriminatory access in this regard means the OSS interfaces must provide (1) equivalence to the ILEC for information availability and accessibility, (2) equivalence of information accuracy, and (3) equivalence of information timeliness to OSS functions as an agent of the customer.
17. Nondiscrimination, sometimes referred to as parity, is a prevalent theme throughout the Act and the FCC's First Report and Order. It is the standard that has been set to ensure an environment is created that is conducive to competition. A lesser standard would certainly hinder competition. Since the Act seeks to create an environment where effective competition can take place, it is clear that anything less than nondiscriminatory access to OSS is unacceptable in accomplishing this goal.
18. For an interface to provide nondiscriminatory access to an incumbent LEC's OSS, it must meet the following requirements to keep these interfaces and access to OSS databases at parity with the incumbent LEC's retail organization.  
  
**Electronic Interface.** A machine-to-machine interface (computer application program to computer application program) that enables a fully electronic interaction between the incumbent LEC's OSS and the new entrant's OSS is required. These transactions must flow

through electronically between OSS databases without human intervention.

**Equivalence of Information.** The interface from the incumbent LEC's OSS must have at least the same functional information from their operations support functions and offer parity in accuracy, response times, and timeliness.

**Documentation.** The documentation of each interface must be adequately completed and communicated in advance to enable CLECs the opportunity to create their interfaces and to develop the appropriate operational procedures.

**Operability Testing.** The interfaces need to be tested in a real world environment to determine that a parity level of service can be offered with an equivalence of information timeliness.

**Standards Based.** The interfaces need to be based upon uniform national standards.

Uniform national standards should be formulated by the Alliance for Telecommunications Industry Solutions ("ATIS"). Deadlines should be imposed for the implementation of the standards developed by the ATIS industry forum. Without standards, Sprint is required to build a separate interface for each incumbent LEC which increases costs and impacts the capability to provide a quality level of customer service.

19. Fundamentally, Sprint believes that nondiscriminatory access to operational support systems encompasses more than merely publishing descriptions of system functionality. It is achieved when the systems interfaces are functioning in a real world operating environment such that the resulting experience for the CLEC's end user customer is at parity with what BellSouth provides its own customers. This is the only true test of whether nondiscriminatory access with respect to operational support systems has been achieved.

20. Sprint does not believe that BellSouth's currently deployed operational support systems interfaces meet the standard of nondiscriminatory access. While BellSouth continues to add functionality to its current interfaces and develop new machine-to-machine interfaces consistent with evolving industry standards, the interfaces BellSouth has introduced to date are not fully deployed and tested, are interim solutions and are not at parity with BellSouth's own retail systems.
21. BellSouth has recently introduced several interim interfaces for use by the CLEC community. These interfaces still support only certain products, features, and service order parameters. Many new releases designed to fill these gaps in the functionality needed to provide nondiscriminatory access are planned by BellSouth. But until these interfaces are fully developed, deployed and tested in a real world operating environment, their ability to provide parity to what BellSouth experiences in providing service to its own customers will not be known.
22. In testimony presented in several states in conjunction with BellSouth Section 271 proceedings, as well as in paragraph 4 of Mr. Stacy's Affidavit, BellSouth has asserted that interfaces for each function are fully operational. While Sprint does not dispute BellSouth's assertion that the interfaces discussed in its testimony are operational, it is important to point out that there are numerous gaps in functionality that are still being addressed.
23. For example, electronic access to Customer Service Record ("CSR") information has only recently become available. Mr. Stacy states in paragraph 38 that both CLEC and BellSouth customer service representatives can only view and print out the first 54 pages of a CSR. In fact, Sprint personnel have been advised during BellSouth training sessions that CLECs will

not have the same ability as BellSouth's own retail operation to view and print multiple pages of a CSR. Sprint has warned that Local Exchange Navigation System ("LENS"), BellSouth's pre-order interface system for competitive providers, will only enable CLECs to view and print the first 50 pages of the customer's record. A phone call to BellSouth's Local Carrier Service Center ("LCSC") is then required to obtain the additional pages in the record. BellSouth personnel need not rely on this cumbersome process to view additional CSR information. In addition, rates for service and equipment items displayed on the CSR are not presented in LENS. This creates a problem in that customers may be exempt from paying for certain items represented by Universal Service Order Codes ("USOCs") on the CSR. If the USOC is displayed without the associated charge rendered to the customer, a CLEC's service representative will not be able to know whether the USOC is a "non-rated" item. This scenario exists, for example, where customers are exempt from Subscriber Line Charges ("SLCs"). These small differences in functionality have a significant negative impact to a CLEC's sales or service representative's productivity. There is also a corresponding impact as far as being able to provide a CLEC customer with the same experience that BellSouth provides its own customers.

24. Moreover, until electronic access to CSRs is tested in a "live" operating environment and experience is gained serving customers with this new functionality, BellSouth's ability to provide parity in the customer experience is unknown.
25. BellSouth's affiant, Mr. Stacy, in paragraph 6 of his Affidavit, says, "pre-ordering information - such as telephone numbers or installation dates - is not necessary for competition for the huge installed base of existing customers who only want (at most) to

switch service providers.” Obtaining telephone numbers and installation dates, however, represents just a small portion of the pre-order data necessary to properly provide CLEC service. Sprint’s experience as a CLEC in Florida and in other states, both as a resale and facilities-based provider, has without exception demonstrated that real time, interactive access to CSR information is absolutely critical to providing accurate service pricing information and other service enhancement recommendations. It is well known within telecommunications sales and service organizations that many customers do not know exactly what services and features they have, or may believe they subscribe to certain features, when in actuality they do not. CLECs must, in the pre-order process, be able to view and access the CSR information at parity with BellSouth in order to provide corresponding parity with respect to the customer’s service experience.

26. With respect to ordering, BellSouth states in its Louisiana 271 application that it does not rely on LENS to meet its nondiscriminatory access obligation. However, many CLECs, due to cost and technology considerations, will need to rely upon LENS for the foreseeable future. Moreover, while LENS does not currently support all products or order types, it is the only interface available which provides some capability to integrate pre-order and order functions. This is essential to reducing errors which will inevitably occur from the manual transfer of information between pre-order and ordering interfaces. This issue is also relevant for BellSouth’s “preferred” interface for ordering, EDI, since there is no pre-order capability with EDI.