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December 8, 1997

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DEC 8 - 1997

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

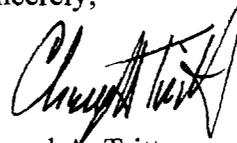
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

*Re: Petition for Further Reconsideration filed by the Telecommunications  
Management Information Systems Coalition and The Utility Reform  
Network, CC Docket No. 96-61*

Dear Ms. Salas:

Enclosed is the declaration of Kimberly Sierk with her original signature. A copy of Ms. Sierk's declaration with a faxed signature page was filed with the above-referenced petition on December 4, 1997.

Sincerely,



Cheryl A. Tritt  
Counsel for the Telecommunications  
Management Information Systems Coalition

cc: Chairman William E. Kennard  
Commissioner Susan Ness  
Commissioner Harold Furchtgott-Roth  
Commissioner Michael Powell  
Commissioner Gloria Tristani  
A. Richard Metzger, Jr.  
Ruth Milkman  
Richard K. Welch  
James D. Schlichting  
Carol E. Matthey  
Susan Launer  
Jordan Goldstein

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## **Declaration of Kimberly Sierk**

I, Kimberly Sierk declare that:

1. I am a vendor relations specialist at Salestar.
2. In September and October 1997, Salestar conducted a study using a number of its telecommunications analysts to determine the degree of difficulty associated with obtaining directly from a number of long distance carriers information regarding pricing, terms and conditions sufficient to enable Salestar's customers to make informed choices among available long distance service plans. The study also sought to ascertain the level of research necessary to acquire the desired information as well as to identify the obstacles associated with the collection of information.
3. I coordinated and oversaw the study, including performing an analysis of the information gathered by Salestar's analysts.
4. The analysts researched a number of business and residential plans and promotions from AT&T, MCI, Sprint and WorldCom. The residential plans and promotions researched included MCI One Savings, AT&T's One Rate Plus, Sprint Sense, and WorldCom's Home Advantage Easy Plan. The business plans included message toll service ("MTS") from MCI, AT&T and Sprint and WorldCom's Intelnet service.
5. The analysts were asked to gather specific information from each carrier about these plans including information regarding fees, rates, calling card rates and surcharges, mileage bands, volume, time of day and other discounts, subscriber and usage eligibility, start up promotions and monthly recurring charges.
6. The analysts were instructed to seek information from any available source including the carriers' sales representatives, customer service departments, marketing and PR

departments and web sites. The analysts also were instructed to confirm verbal information with at least two different company representatives and to obtain written materials if possible.

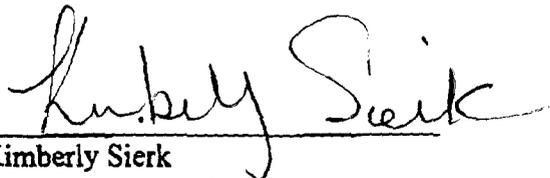
7. Overall, Salestar's analysts found it very difficult to obtain detailed and accurate information directly from long distance carriers. With very few exceptions, the analysts were only able to obtain information after making multiple telephone calls and/or sending multiple e-mails to a variety of different departments at each carrier. When analysts were able to connect with the knowledgeable individuals, the information provided was generally cursory. For example, one analyst researching Sprint Business Sense found an overview of Sprint's Fridays Free 2000 plan on Sprint's web site, but found Sprint's representatives to be very reluctant to provide any information about the plan's details.

8. Few analysts were able to obtain written documentation to confirm information provided verbally. Some analysts who requested more detailed information were referred to the carrier's tariffs. For example, two different analysts attempting to find more detailed information on the Sprint Business Sense plan were directed to review Sprint's tariffs. In addition, one analyst was told that the company had nothing comprehensive outlining the calling plan except the tariff. Other analysts were told that more detailed information was considered proprietary. Two of the analysts researching AT&T's business plans, for example, were told by AT&T representatives that all plan specifics were considered proprietary information. On multiple occasions, analysts were given conflicting information for identical calling plans. For example, an analyst researching MCI's business plans was told by one MCI representative that MCI no longer charged a calling card surcharge, but was told by other MCI representatives that a calling card surcharge was applied to every call.

9. Information regarding some services, such as basic MTS for business use, was virtually impossible to obtain. Most carriers were unwilling to provide any specific information regarding their business plans. For example, one analyst was told by a Sprint representative that it would be difficult to answer any questions on what actual business rates are because of the number of variables involved that affect rates, including plan terms and volume and special discounts. The Sprint representative would not, however, provide any description of these terms or discounts. Another analyst researching AT&T's business plans was told that AT&T would not give basic MTS rates unless they were provided with "specifics" about a customer's calling patterns.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4<sup>th</sup> day of December 1997.



Kimberly Sierk  
Vendor Relations Specialist  
Salestar