C

REBUTTAL TESTIMONY OF DAVID M. EISENSTADT, Ph.D.

Q: WHAT ADDITIONAL WORK OR INVESTIGATION HAVE YOU UNDERTAKEN SINCE YOU FILED YOUR DIRECT TESTIMONY?

A: I reviewed the pre-filed direct testimony of BA-NY's marketing panel, Ronald P. Kubicki , and various Information Providers (IPs). I read New York Public Service Commission (NYPSC) opinions and orders pertaining to the regulation of billing and collection services, and actual and sample proposed interconnection agreements between BA-NY and competing local exchange carriers. I have spoken to an independent third party billing organization, Larry Weiss, Richard Cohen, Chris Hanifin, and Pat Curran. Messrs. Weiss and Cohen have filed direct testimony in this proceeding. Mr. Hanifin and Ms. Curran are employees of the New York State Department of Public Service.

Q: WHAT CLARIFICATIONS YOU WOULD LIKE TO MAKE TO YOUR DIRECT TESTIMONY?

A: Yes, there are several. First, BA-NY provides call processing only for 976 providers. Second, BA-NY's tariffed rates to IPs for GBS services range from range from \$0.20 for the first minute and \$0.05 for subsequent minutes, to \$0.31 for the first minute and \$0.09 for additional minutes. Third, the three GBS end-user pricing combinations that IPs can choose from are: (1) \$0.30 cents for the first minute and \$0.11 cents for each additional minute, (2) \$0.40 cents for the first minute and \$0.15 cents for each additional minute, and (3) \$0.50 cents for the first minute and \$0.20 cents for each additional minute.

It is my understanding that most IPs select the third pricing option. Fourth, BA-NY prices for billing and collection services are only partially unregulated. The unregulated or "lightly regulated" components include (1) posting charges to a bill, (2) customer inquiries, (3) stuffing and mailing envelopes, and (4) collection of charges for posting telephone calls to a subscriber's bill.[1] Billing and collection services which remain regulated and subject to PSC tariff are (1) automatic number identification (ANI), (2) billing name and address (BNA), and (3) call recording detail.[2]

Q: WHAT DOES THE TERM "LIGHTLY REGULATED" MEAN?

A: As I understand the term, the Commission may examine claims of discrimination and maximization of revenues with respect to unregulated billing and collection services.[3]

Q: DO ANY OF THESE CLARIFICATIONS AFFECT YOUR OVERALL CONCLUSIONS REGARDING THE POTENTIAL COMPETITIVE IMPACT THAT WOULD RESULT FROM BA-NY's TERMINATION OF INFOFONE

---

[1]State of New York, Public Service Commission, Opinion No. 90-33.

[2]Ibid.

[3]It is unclear, and Department of Public Service Staff confirm, what types of behavior would necessarily qualify as discriminatory. For example, the Staff was not certain whether charging competing local exchange carriers (CLECs) different unregulated billing and collection rates than are charged to interexchange carriers (IXCs) or service bureaus might constitute a discriminatory practice under existing law.

Additionally, it is unclear from Commission Opinion No. 90-33 whether maximization of revenues is meant to indicate monopoly pricing.

SERVICES?

A: No.

Q: IF BA-NY TERMINATES INFOFONE SERVICES, WHAT UNREGULATED OR "LIGHTLY REGULATED" BILLING AND COLLECTION SERVICES WOULD IPs MOST LIKELY PURCHASE DIRECTLY OR INDIRECTLY FROM BA-NY?

A: The answer depends on the platform or telecommunications technology that IPs use to transport calls. However, for all telecommunications platforms other than plain old telephone service (POTS) with credit card billing, the charge for the IP's service must practically appear on BA-NY's bill to the subscriber who made the call, provided the call originated on a BA-NY line. Hence, whether transport and/or processing was provided via 900 service, a competing local exchange carrier (CLEC), or a service bureau, BA-NY bills the caller. As such, BA-NY charges any of these organizations -- interexchange carriers, CLECs, and service bureaus -- amounts for the unregulated portions of billing and collection. BA-NY's charges to these organizations are then passed through to the IPs who have billing and collection agreements with these same entities.

It is not practical for IPs to use private billing services to prepare and mail bills for pay-per-call services. This is especially true for inexpensive calls like 976 MAS and most IINS calls. The costs of using a private biller to generate and mail a bill are prohibitive and the chargebacks are high. One IP indicated that chargebacks with private billing services are approximately 80 percent. To that IP's knowledge, virtually all pay-per-call services, regardless of platform, are billed through LECs in every area of the United States where the IP conducts business.

Q: COULD YOU EXPLAIN MORE SPECIFICALLY HOW BA-NY WOULD PROVIDE REGULATED AND UNREGULATED BILLING AND COLLECTION SERVICES TO A CLEC WHO PROVIDED AN INFOFONE-TYPE SERVICE?

A: At regular intervals, the CLEC would provide an electronic record of billing data to BA-NY. This record would include ANI data provisioned to the CLEC at the time of the call, plus call detail information (date, time, and length of the call). As noted above, BA-NY's charges to the CLEC for these two services are regulated and tariffed. Using this electronic information, BA-NY incorporates a charge for the IP's service on the BA-NY subscriber's telephone bill, and it collects from the subscriber the amount of the IP's charge for the call. The latter two BA-NY services, bill posting and bill collection, are unregulated. Upon collection of the amount owed by the subscriber, BA-NY remits these monies to the CLEC, minus whatever fees BA-NY charges for call origination, transport, and billing and collection. The remainder is distributed to the IP, minus the CLEC's billing and collection fees to the IP.

Q: ARE A CLEC's BILLING AND COLLECTION CHARGES TO THE IP REGULATED AND GOVERNED BY TARIFF?

A: No, they are unregulated.

Q: WHAT IS BILL FORMATTING?

A: Bill formatting refers to the appearance and location of the IP's charge on BA-NY's bill to the subscriber.

Q: IS BILL FORMATTING A REGULATED OR UNREGULATED SERVICE?

A: It is my understanding that this is an unregulated or "lightly regulated" service.

Q: IF THE BOTTLENECK COMPONENTS OF BILLING AND COLLECTION CONTINUE TO BE REGULATED, WHAT ADVERSE COMPETITIVE CONSEQUENCES COULD RESULT FROM THE TERMINATION OF INFOFONE SERVICES?

A: There are four possible scenarios under which BA-NY could adversely affect competition among IPs through monopolization of one or more markets.

First, BA-NY could monopolize unregulated, end user pay-per-call information services markets if it declines to offer unregulated billing and collection services to third party billers, resulting in the immediate exit of InfoFone IPs, <u>and</u>, at a subsequent time, integrates downstream as a full-scale information provider.

Second, BA-NY could choose not to integrate, but rather charge monopoly prices for those portions of billing and collection which are now unregulated or "lightly regulated," and for which there are no current, viable or practical alternatives to BA-NY for billing and collection. By so doing, BA-NY would successfully evade the regulation still intended for those specific services.

Third, BA-NY could integrate downstream and offer information services that are competitive to those offered by present IPs and, at the same time, charge "high" (but "technically" non-discriminatory) rates to IPs or CLECs for billing and collection. This third scenario would constitute a price squeeze that would adversely impact the ability of IPs to compete against BA-NY's own unregulated information services, while simultaneously permitting BA-NY to charge monopoly prices to downstream information services for unregulated components of billing and collection.

Fourth, BA-NY could integrate downstream as discussed above and charge its own unregulated subsidiary and independent IPs equally "high" rates for unregulated components of billing and collection. This would allow BA-NY to extract all available upstream monopoly profit, even though the independent IPs have not been discriminated against.

Q: **COULD YOU EXPLAIN MORE FULLY HOW EACH ONE OF THESE SCENARIOS MIGHT OCCUR?**

A: The first scenario involves simple monopolization of one or more downstream pay-per-call services markets. If BA-NY terminates InfoFone services and declines to offer billing and collection services to IPs, InfoFone IPs believe they will be will be forced to exit or migrate to higher cost technologies for transport and billing and collection. BA-NY's own witnesses and documents indicate that transport costs for 900 service are at least triple the transport rates that BA-NY charges IINS IPs' who purchase InfoFone services. And, several IPs estimate that, given current billing agreements between third party billers and BA-NY, billing organizations would likely charge in excess of $1 per call for the preparation of a billing record that would ultimately appear on a BA-NY subscriber's telephone bill. By inducing the exit of InfoFone IPs or their migration to a higher cost technology, BA-NY could, subsequently, integrate downstream, sell unregulated information services, and profitably charge higher-than-current end prices for information services that use InfoFone. The reason why BA-NY gains this pricing discretion, and why current IINS IPs presently cannot exercise this same pricing discretion, is the competitive constraint created by the present competition among the IPs. By terminating InfoFone services, forcing the IPs to migrate to a higher-cost technology, and integrating downstream using an equivalent cost technology to InfoFone, BA-NY can capture monopoly rents which the IPs' now compete away.

The second scenario involves BA-NY extracting all available downstream monopoly profit, even though it does not integrate.[4] In this scenario, BA-NY charges "high," but uniform

[4]One could reasonably ask under what circumstances BA-NY would prefer vertical integration to simple monopoly pricing of an near-bottleneck input. The example cited in the Q&A assumes a simple fixed-proportions relationship between the unregulated, near-bottleneck components of billing and collection and the other inputs used in the provision of information services. If BA-NY and the independent IPs are equally efficient in the provision of downstream information services, BA-NY would be indifferent between vertical integration and supra-competitive pricing of the unregulated, near-bottleneck components of billing and collection.

prices for unregulated billing and collection services. If, under this scenario, BA-NY's pricing for these services effectively escapes PSC detection and/or oversight, BA-NY's charges for these services would equal the monopoly downstream price (the downstream price that would prevail if there were a single profit-maximizing IINS IP offering that service) minus the marginal costs and tariffed rates for the other relevant inputs.

The third scenario involves a price squeeze, which represents a combination of BA-NY downstream vertical integration and excessive, or "high" BA-NY prices for the unregulated portions of billing and collection. In this scenario, the IPs would be forced to exit even though BA-NY continues to provide the unregulated portions of billing and collection.[5] However, it offers these services to its own unregulated downstream subsidiary at lower prices than it offers to independent IPs. If BA-NY charges independent IPs prices for these services which exceeds the profit maximizing price for these same services described in

---

However, if the unregulated, near-bottleneck input is combined in variable proportions with other inputs, vertical integration is likely to be the more profitable strategy. When variable proportions technology exists, independent downstream firms have incentives to substitute away from the near-bottleneck, unregulated input. The upstream input monopolist will integrate downstream and attempt to monopolize the downstream market to minimize the opportunities for substitution.

The Q&A in the text assumes only that current regulation is binding and constrains BA-NY from charging profit maximizing prices for InfoFone services. A particular form of regulation, such as allowed rate-of-return regulation is not specifically assumed in the example. Under rate-of-return regulation, BA-NY might have additional incentives to unbundle InfoFone services, create an unregulated downstream subsidiary, or invest in particular types of billing and collection technologies.

[5]Downstream vertical integration to avoid or minimize substitution away from the near-bottleneck input could be one reason why BA-NY would choose to both integrate and engage in a price squeeze.

scenario two, the combined costs of a typical IP would exceed BA-NY's downstream monopoly price, even when IPs pay no more for transport than they presently do under InfoFone tariffs. If such a price-squeeze occurred, an IP could not earn a profit and could not sell downstream information services which are price competitive to those offered by BA-NY.

The fourth scenario involves BA-NY charging a "high" (and technically non-discriminatory) price for unregulated billing and collection services to both its unregulated subsidiary and to independent organizations. Here, both the BA-NY subsidiary and IPs compete on a level playing field, but BA-NY extracts monopoly profit through its high charges for billing and collection.

Q: WHAT IS YOUR REACTION TO THE TESTIMONY OF BA-NY WITNESSES WHO OPINE THAT THERE EXISTS NUMEROUS ALTERNATIVES TO THE SERVICES PROVIDED BY INFOFONE IPs?

A: When evaluating the impact that termination of InfoFone services might have on end-users, it is important not to confuse the mere existence of alternatives with the presence of good alternatives. For example, automobile travel, water transport, rail transportation, and bicycling are all alternative means of traveling from New York City to Los Angeles. However, few individuals would assert that any of these transportation modes individually, or collectively, provide much constraint on the pricing of air travel between the two points. Rather, competition among the different airlines who serve this city pair provides, by far and away, the greatest source of pricing discipline.

The example demonstrates that, for antitrust purposes, a relevant market does not properly include all conceivable substitute products or services. Rather it includes just those products (and firms selling those products) that a hypothetical monopolist of a candidate service would find it necessary to also own (merge with, or control) to fully and profitably raise price by a small, but significant, non-transitory amount.

In this regard, BA-NY's witnesses claim merely that the technology exists to provide telephone information services using 900 service, POTS with credit card billing, or CLEC provision of InfoFone-type services. They hint that the presence of these alternatives is sufficient to prevent end-user prices from rising if BA-NY terminates InfoFone services.

To this extent, it is worth noting that BA-NY's own documents indicate a recognition by the company that IINS services are a relevant product market for antitrust purposes, and that termination of InfoFone would, indeed, cause end-user IINS prices to increase. In comparing 976 MAS and IINS pricing with rates for 900 service transport and billing and collection, BA-NY notes that:

> "Pricing is the primary edge that IINS has over the competition. The demand curve for IINS is downward sloping. If price is lowered, total

revenue would decrease. Demand is inelastic.[6]"

The statement reveals it would be profitable for a monopolist of IINS services to raise price, and that competition among the IINS IPs principally constrains IINS pricing to end-users, rather than competition between IINS and 900 IPs.

[6]BA-NY InfoFone Services - New York & Y2k: Impact & Alternatives Analysis, April, 1998, p. 14.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NEW YORK

IN THE MATTER OF NEW YORK TELEPHONE COMPANY'S PROPOSAL TO DISCONTINUE OFFERING INFORMATION SERVICES	)))	Case No. 98-C-1079

AFFIDAVIT OF DAVID M. EISENSTADT, Ph.D.

DISTRICT OF COLUMBIA, SS:

David M. Eisenstadt, Ph.D., of lawful age, being first duly sworn deposes and states:

1. My name is David M. Eisenstadt. I am a Principal at Microeconomic Consulting and Research Associates, an antitrust economics consulting firm located in Washington, D.C.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

David Eisenstadt
(Name)

Subscribed and sworn to this 28th day of December, 1998

M L Bordon
Notary Public

My Commission Expires: My Commission Expires October 31, 1999

3(A

INTERCONNECTION AGREEMENT UNDER SECTIONS 251 AND 252 OF THE TELECOMMUNICATIONS ACT OF 1996

Dated as of June 25, 1996

by and between

NEW YORK TELEPHONE COMPANY

and

MFS INTELENET OF NEW YORK, INC.

reinstate service to that Customer, cancel the INP arrangements for that Customer's telephone number(s), or redirect the INP arrangement to another INP-participating-LEC pursuant to the Customer's instructions at that time.

13.3 Procedures for Providing INP Through Route Indexing

Upon mutual agreement, NYNEX will deploy a Route Index arrangement which combines direct trunks, provisioned between NYNEX's and MFS' end offices, with trunk side routing translations. Under this arrangement, inbound calls to a ported number will be pointed at a route index that sends the call to a dedicated trunk group, built as a direct final, for the sole purpose of facilitating completion of calls to a ported number. NYNEX will coordinate with MFS to provide this solution in a mutually agreeable and administratively manageable manner (e.g., NXX level) so as to minimize switch resource utilization for both Parties.

13.4 Procedures for Providing INP Through Full NXX Code Migration

Where either Party has activated an entire NXX for a single Customer, or activated a substantial portion of an NXX for a single Customer with the remaining numbers in that NXX either reserved for future use or otherwise unused, if such Customer chooses to receive service from the other Party, the first Party shall cooperate with the second Party to have the entire NXX reassigned in the LERG (and associated industry databases, routing tables, etc.) to an End Office operated by the second Party. Such transfer will be accomplished with appropriate coordination between the Parties and subject to appropriate industry lead-times for movements of NXXs from one switch to another.

13.5 Other Interim Number Portability Options

MFS may also request Direct Inward Dial Trunks pursuant to applicable tariffs. NYNEX and MFS will trial Number Portability in connection with information services traffic (e.g., 976). Until the trial is completed, interim number portability will not be available for use with Information Services traffic.

13.6 Receipt of Terminating Compensation on Traffic to INP'ed Numbers

The Parties agree that the prices set forth in the Pricing Schedule shall apply for each number ported.

The Parties agree that under INP terminating compensation on calls to INP'ed numbers should be received by each Customer's chosen LEC as if each call to the Customer had been originally addressed by the caller to a telephone number bearing an NPA-NXX directly assigned to the Customer's chosen LEC. In order to accomplish this objective where INP is employed, the Parties shall utilize the process set forth in this Section 13.6 whereby terminating compensation on calls subject to INP will be passed from the Party which performs the INP (the "Performing Party") to the other Party for whose Customer the INP is provided (the "Receiving Party").

PRICING SCHEDULE

I. Reciprocal Compensation shall equal the rate set forth in the Parties' applicable tariffs as determined by the weighted average call volume distribution by time of day. Such rate for the first six months shall be:

Rate = $.008 per minute

The rate for reciprocal compensation is to be adjusted bi-annually based upon the rates and formula set forth in this Pricing Schedule. The first adjustment shall occur on January 1, 1997 and future adjustments every six months thereafter.

II. Information Services Billing and Collection

Fee = $.05 per message

III. BLV/BLVI Traffic

Rate = $1.00 per Busy Line Verification
$1.50 per Busy Line Verification Interrupt
(in addition to $1.00 for Busy Line Verification)

IV. Transit Service

A. Transit Service

Rate = $.0035 per minute

B. Dedicated Transiting Service

Rate = twice the applicable Service Access Charge ("SAC")

V. Interim Telecommunications Number Portability

A. Monthly Recurring Charges

Rate per Business Number = $2
Rate per Residential Number = $1

approved by the New York State Public Service Commission ("NYPSC") for the exchange of intraLATA (including local) end user traffic.

c) A meet point billing arrangement may be established at NYT's designated access tandem for the purpose of completing interexchange carrier traffic only in accordance with the Meet Point Billing and Provisioning guidelines adopted by the "Ordering and Billing Forum." However, meet point billing arrangements will not apply to redirected calls under INP.

d) Carrier may interconnect to NYT's 911 hub for the provision of 911 services and for access to all subtending Public Safety Answering Points. The total cost for interconnecting to NYT's 911 hub for NPA 212 will be $252 per month for an unequipped DS1 port and $100 per month per voice grade trunk activated and equipped on the DS1 port. A plan for 911/E911 in other NPA's and E911 service will be developed cooperatively by March 1, 1995.

e) When Carrier delivers information services traffic (i.e., 976/394) to NYT, originated on Carrier network, Carrier will bill and collect the applicable rate set forth in NYT's PSC Tariff No. 900 from its end users, retaining $0.02 per call and remitting the remainder to NYT, unless Carrier obtains tariff approval from the specifically permitting Carrier to charge its end users a rate different than the rate set forth in NYT's PSC Tariff No. 900 for these services. In the event Carrier does obtain such tariff approval from the NYPSC, Carrier shall pay to NYT the rate set forth in NYT's Tariff No. 900 applicable to calling parties, less $0.02 per call. Carrier shall seek such tariff approval on not less then 45 days notice, with individual written notice to all subscribers to NYT's MAS. NYT shall furnish Carrier with a list of all such subscribers upon request. When Carrier delivers other information services traffic, including not limited to calls to telephone numbers beginning with the NXX designation of 540 or 970, NYT will bill Carrier on behalf of the information provider those rates associated with such calls as established by the information provider.

f) NYT will, at MFSI's option, provide directory assistance to Carrier end users. Such directory assistance may include an announcement mentioning NYT, or Carrier, at Carrier's option. If Carrier elects this option, Carrier must provide NYT with its directory listings for inclusion in NYT's directory assistance database and must also provide periodic updates of its directory listings, in a format required by NYT or its agent, NYNEX Information Resources Company. Carrier also agrees to abide

DIRECTORY CONTENTS

FREE INFORMATION

InfoTips®

(301) 294-6464

Call 24 Hours a Day!

THEN ENTER THE CODE FOR... ASTROLOGICAL FORECAST FOR ADULTS & TEENS

	ADULTS	TEENS
AQUARIUS	1751	1765
PISCES	1752	1766
ARIES	1753	1767
TAURUS	1754	1768
GEMINI	1755	1769
CANCER	1756	1770
LEO	1757	1771
VIRGO	1758	1772
LIBRA	1759	1773
SCORPIO	1760	1774
SAGITTARIUS	1761	1775
CAPRICORN	1762	1776
YOUR BIRTHDAY TODAY	1763	1777

FOR KIDS & TEENS

SPACE ADVENTURE GAME	1616
HOW TO PREPARE FOR COLLEGE	1618
HOW TO PICK THE COLLEGE FOR YOU	1619

SPORTS & BUSINESS

NATIONAL SPORTS	1410
NATIONAL NEWS	1502
BUSINESS HEADLINES	1504

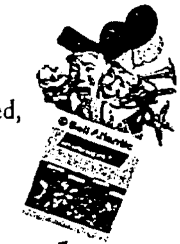
Published by:
Bell Atlantic Directory Services - Maryland, Inc.
c/o Bell Atlantic Directory Services, Inc.
6701 Democracy Boulevard
Bethesda, MD 20817

Call our FREE information services Fast, Convenient, Accessible 24 Hours a Day!

InfoSCENE® - InfoTips®

HOW TO USE:

1. On a touch-tone phone, call (301) 294-6464
2. When prompted, enter the four-digit code



After listening to the message, you may press 0 to be directly connected, enter another code, or simply hang up.

INFOSCENE® - A tourism and entertainment guide.

Located at the front of the directory, InfoSCENE contains the latest information about the attractions and businesses that interest you.

Look throughout InfoSCENE for ☎ and follow the instructions above to get current information.

InfoSCENE also contains a map locator to help you find the location of these attractions and businesses.

Look for ◈ and then refer to the locator key found on each map page in the Getting Around Section of InfoSCENE.

INFOTIPS® - FREE Consumer Information

Call InfoTips for expert advice on more than 100 topics. Look for the InfoTips box located throughout the Yellow Pages and follow the instructions above.

For a complete list of InfoTips Yellow Pages headings see page 30 of InfoSCENE.

InfoTips®

A product of Bell Atlantic®

(301) 294-6464
Call 24-Hours-A-Day!

Call InfoTips® for free information on more than 100 topics.

InfoTips® is fast, convenient and accessible 24 hours a day.

Look for the InfoTips® box under the following Yellow Pages categories:

ACCOUNTANTS - CERTIFIED PUBLIC
AIR CONDITIONING CONTRACTORS & SYSTEMS
AIRLINES
APARTMENTS
APPLIANCES - HOUSEHOLD - MAJOR - DEALERS
APPLIANCES - HOUSEHOLD - MAJOR - SERVICE & REPAIR
AUTOMOBILE BODY - REPAIRING & PAINTING
AUTOMOBILE DEALERS - NEW CARS
AUTOMOBILE DEALERS - USED CARS
AUTOMOBILE LEASING
AUTOMOBILE PARTS & SUPPLIES - NEW
AUTOMOBILE PARTS & SUPPLIES - USED & REBUILT
AUTOMOBILE RENTING
AUTOMOBILE REPAIRING & SERVICE
BAIL BONDS
BANKS
BEAUTY SALONS
BICYCLES - DEALERS
BOAT DEALERS
BRAKE SERVICE
BUILDING MATERIALS
BURGLAR ALARM SYSTEMS & MONITORING
CARPET & RUG CLEANERS
CARPET & RUG DEALERS - NEW
CATERERS
CELLULAR TELEPHONE - EQUIPMENT & SUPPLIES
CHILD DAY CARE CENTERS
CHIROPRACTORS D.C.
CLEANERS
CLINICS
COMPUTERS - DEALERS
CONTRACTORS - GENERAL
COPYING MACHINES - SALES, SERVICE & SUPPLIES
CREDIT & DEBT COUNSELING SERVICES
DENTISTS
DIVERS EQUIPMENT & SUPPLIES
DOORS
DRAPERIES & CURTAINS - RETAIL & CUSTOM MADE
DRIVING INSTRUCTION
ELECTRIC CONTRACTORS
EMPLOYMENT AGENCIES
EMPLOYMENT CONTRACTORS - TEMPORARY HELP
FAX COMMUNICATIONS EQUIPMENT & SYSTEMS
FENCE
FLORISTS - RETAIL
FORMAL WEAR - RENTAL & SALES
FUNERAL DIRECTORS
FURNITURE - RETAIL
GLASS - AUTOMOBILE, PLATE, WINDOW, ETC.
GOLF COURSES - PUBLIC
HEALTH CLUBS
HEATING CONTRACTORS
HOME IMPROVEMENTS
HOSPITALS
HOTELS
HOUSE CLEANING
INSURANCE
JEWELERS - RETAIL
LANDSCAPE CONTRACTORS
LAWN MAINTENANCE
LAWN MOWERS
LAWYERS
LAWYERS GUIDE
LIMOUSINE SERVICE
LOANS
LOCKS & LOCKSMITHS
MATTRESSES
MORTGAGES
MOTORCYCLES & MOTOR SCOOTERS - DEALERS
MOVING & STORAGE
MUFFLERS & EXHAUST SYSTEMS - ENGINE
MUSICAL INSTRUMENTS - DEALERS
NURSES
NURSING HOMES
OFFICE FURNITURE & EQUIPMENT - DEALERS
OPTICAL GOODS - RETAIL
OPTICIANS
OPTOMETRISTS
PAGING & SIGNALING - EQUIPMENT & SYSTEMS
PAINTING CONTRACTORS
PAWNBROKERS
PEST CONTROL SERVICES
PET SHOPS
PHARMACIES
PHOTO FINISHING - RETAIL
PHOTOGRAPHERS - PORTRAIT
PHYSICIANS & SURGEONS - MEDICAL M.D.
PHYSICIANS & SURGEONS - OSTEOPATHIC D.O.
PHYSICIANS & SURGEONS - PODIATRIC D.P.M.
PHYSICIANS & SURGEONS GUIDE
PICTURE FRAMES - DEALERS
PLUMBING CONTRACTORS
PRINTERS
RADIATORS - AUTOMOTIVE
REAL ESTATE
RENTAL SERVICE STORES & YARDS
RESTAURANTS
ROOFING CONTRACTORS
SCREEN PRINTING
SEWER & DRAIN CLEANING
SIGHTSEEING TOURS
SIGNS
SPORTING GOODS - RETAIL
SPRINKLERS - GARDEN & LAWN
STORAGE - HOUSEHOLD & COMMERCIAL
SURFBOARDS
SWIMMING POOL CONTRACTORS, DEALERS & DESIGNERS
TAX RETURN PREPARATION
TELEPHONE EQUIPMENT & SYSTEMS - DEALERS
TELEVISION & RADIO - DEALERS
TILES - CERAMIC - CONTRACTORS & DEALERS
TIRE DEALERS
TOWING - AUTOMOTIVE
TRANSMISSIONS - AUTOMOBILE
TRAVEL AGENCIES & BUREAUS
TREE SERVICE
VETERINARIANS
WATER - BOTTLED, BULK ETC
WEDDING CONSULTANTS
WINDOWS

SPICES

J O SPICE CO
SPICES / CUSTOM BLENDING
CRAB - SEAFOOD SEASONING
OUR SPECIALTY
Call Toll Free 800-537-5714
3721-25 Old Georgetown Rd Arbutus ---- 410 247-5205

St John's Herb Garden
7711HillmeadeRd Bowie MD ---- 301 262-5302
Watkins Products
6337 OldBranchAv CampSprings ---- 301 449-3569
WATKINS PRODUCTS
Quality Spices & Home Products For Over 128 Years
2804ShanandaleDr SilverSpring ---- 301 572-5648

SPILL CONTROL SERVICE

A & A ENVIRONMENTAL SERVICES
24 Hour Emergency Response
Waste Disposal • Lab Pack Services
Tank Cleaning / Excavation / Closure
Vacuum Services • Marine Services
Toll Free-Dial "1" & Then ---- 800 404-8037

CLEAN HARBORS ENVIRONMENTAL SVCS
24 Hr Emergency : Incident Response
1504BushSt Baltimore ---- 410 685-3910

CLEAN VENTURE CYCLE CHEM
• SITE REMEDIATION
• TANK CLEANING/CLOSURE
• INDUSTRIAL MAINTENANCE
• 24 HOUR EMERGENCY RESPONSE
• LAB PACK & LABORATORY SERVICES
• FULLY PERMITTED "PART B" TSD FACILITY AND OIL/WATER RECYCLING FACILITY
806-P Barkwood Ct ---- 410 636-8290

J P S LIQUID WASTE REMOVAL
WET OR DRY
INDUSTRIAL VACUUM SERVICE
Toll Free-Dial "1" & Then ---- 800 638-2000
5350 Odell Rd Beltsvl ---- 301 595-8900

TRI-COUNTY INDUSTRIES
★ FOR MORE INFORMATION ★
Please See Our Display Ad This Page
3005PowderMillRd Beltsville ---- 301 937-8611

Wise People In A Buying Mood Turn To The Yellow Pages Of The Telephone Directory. If You Have Something To Sell Or A Service To Offer, Tell Prospective Buyers About It Here. Your Bell Atlantic Yellow Pages Sales Representative Will Be Glad To Give You Information About Advertising In The Yellow Pages. Call Today.

SPIRITUALISTS

A FREE PSYCHIC SAMPLE READING
Toll Free Dial "1" & Then ---- 800 737-2226
AARON'S LIVE MASTER PSYCHIC READINGS
Toll Free ---- 800 338-8922
ABBY'S LIVE PSYCHICS
Toll Free-Dial "1" & Then ---- 800 378-9866
ANTHONYS LIVE MASTER PSYCHIC READINGS
Toll Free ---- 800 988-6770
BARBARA NORCROSS THE PALM BEACH PSYCHIC
Toll Free Dial "1" & Then ---- 800 382-1157
Clover Inc ---- 301 735-0041

DIAMOND LIGHT CONSULTING
Phone Readings By Persephone Maywald
A Former Psychologist
Clear, Caring, Practical Information
Since 1986
• RELATIONSHIPS • CAREER
• BUSINESS • HEALTH
MC / VISA
Ask About Our Money-Back Guarantee
www.diamondlight.com
888-234-9338
Toll Free-Dial "1" & Then ---- 888 234-9338

FUTURE WATCH
Toll Free-Dial "1" & Then ---- 800 378-9887
Institute For Applied Spiritual Technology
3200 IvyWay Harwood ---- 301 261-4493
Lee Therese
10713PebbleRunDr SilverSpring ---- 301 681-0643
LOVE & FINANCE PSYCHICS
Toll Free-Dial "1" & Then ---- 800 378-9924
Madam Hora
9413BaltimoreAv CollegePark ---- 301 474-9591
MADAM GRAY
2401FairhavenAv Alexandria ---- 703 765-9619
MASTER PSYCHIC READINGS
Toll Free-Dial "1" & Then ---- 800 988-0667
PSYCHIC LIFE READINGS
Toll Free-Dial "1" & Then ---- 800 988-6765
REV SISTER FAYE PSYCHIC ADVISOR
A Gifted Psychic Who's Been Spiritually Guiding People for 25 Years
8319LibertyRd Baltimore ---- 410 922-6100
SAMPLE PSYCHIC READINGS
Toll Free-Dial "1" & Then ---- 800 200-2852
YELLOW PAGES PSYCHIC NETWORK SAMPLE READINGS
Toll Free Dial "1" & Then ---- 800 577-2224

SPORTING CLAY FACILITIES

See Trap & Skeet Ranges

Advertising In The Bell Atlantic Yellow Pages Tells Where To Buy The Product Or Service You Want. Use This Handy Buyer's Guide. It Saves Time And Trouble. A Look In The Book Saves Money And Steps.

SPORTING GOODS—RETAIL

ABBY'S BARBELLS
Barbells Unlimited - Discount Prices
We Accept Visa
Kensington ---- 301 946-2535

SPORTING GOODS—RETAIL (Cont'd)

Abercrombie & Fitch
7101DemocracyBlvd Bethesda ---- 301 469
Active Edge The
6701RussellAv Gaithersburg ---- 301 670
Acton Sporting Goods
505HamptonParkBlvd CapitolHeights ---- 301 808
ADIDAS THREE STRIPE
Adidas Outlet - Team Discounts
7419BaltimoreAv CollegePark ---- 301 779-88
AMERICAN WATER SPORTS OF VIRGINIA
See Our Ad - Divers Equipment & Supplies
6182-A ArlingtonBlvd FallsChurch ---- 703 534-36
Anne Arundel Paintball Park
Kensington ---- 301 942
ASPEN HILL SPORT SHOP
SilverSpring ---- 301 598-31
Athletes' Choice Team Sales Inc
18777 N FrederickAv, GaithersburgWashingtonAreaTel ---- 301 948
Athlete's Foot
5115 IndianHeadHwy OxonHill ---- 301 567
Athlete's Foot
PrinceGeorge'sPlazaShoppingCenter Hyattsville ---- 301 559
Athlete's Foot The
8661ColesvilleRd SilverSpring ---- 301 589
ATHLETE'S FOOT THE
TheMarketPlace Bowie ---- 301 262-3
Athletic USA
5722SilverHillRd DistrictHeights ---- 301 568
Atlantic Guns Inc
944BonifantSt SilSpg ---- 301 585

Something To Sell? A Service To Offer? If You Have Something To Sell Or A Service To Offer, Here Is The Place To Tell About It. The Yellow Pages Is A Second Store Window. Call Your Yellow Pages Sales Representative For Information On Advertising In The Yellow Pages.

...RECORDERS (cont'd)

MANAGEMENT SOLUTIONS
TIME CLOCKS • NUMBERING STAMPS
PAYROLL CLOCKS • JOB COSTING
ALL BRANDS
...Industrial Dr
Gaithersburg ---------- 301 869-2601

Management Solutions
...IndustrialDr Gaithersburg ---------- 301 869-2601

WHITAKER BROTHERS BUSINESS MACHINES INC
★ FOR MORE INFORMATION ★
Please See Our Display Ad Previous Page
...WashingtonAv Rockville 301 230-2800

TIME STAMPS

...Time Sales & Service
...---------- 301 953-9400
...DPRINT
...- Dial "1" & Then ---------- 800 235-0999
WHITAKER BROTHERS BUSINESS MACHINES INC
...Lathem - Widmer - Acroprint - Jacks - See ... Time Recorders
...WashingtonAv Rockville ---------- 301 230-2800

TIME & TEMPERATURE ANNOUNCEMENTS

...Temperature & Weather
...RiverRd Bethesda ---------- 301 961-2020

...Who Use The Bell Atlantic Yellow Pages Are ... Buying Now.

TIRE DEALERS

A C TIRE COMPANY
GOOD YEAR • MASTERCRAFT • SUMMIT
"A FULL SERVICE TIRE DEALER SINCE 1917"
- Alignment • Brakes
- Shocks • Struts
- Batteries • Mufflers
- Oil & Lube • MD State Inspection
- Steering & Suspension Repairs

Credit Cards • Most
"THE TIRE SPECIALISTS"
Ask For Free Instant Credit
4424 Beech Rd
Marlow Heights ---------- 301 423-4424

A & R Tire
1731EdinburghLn Dunkirk ---------- 301 855-8700
ACTION AL'S TIRE COMPANY
2515BladensburgRdNE ---------- 202 529-1900
(Please See Our Display Ad Page 1468)
ALBAN TIRE CORP
The Experienced Tire People - Wholesale - Retail - Cars - Domestic - Foreign - Trucks - Trailers - Recreation Vehicles - Campers - Off Road Vehicles - Hi Performance Tires - Wheels - Emergency Radio Dispatched
7244BoudinotDr Springfield ---------- 703 451-6046
Armstrong Tire & Accessory Corp
21504LaytonsvilleRd Laytonsville ---------- 301 948-1900

TIRE DEALERS (Cont'd)

AUTOMOTIVE ACCESSORY WAREHOUSE INC
DISCOUNT PERFORMANCE TIRES
Dunlop • Toyo
Bridgestone • Goodyear
AREAS LARGEST SELECTION OF CUSTOM & CHROME WHEELS
Professional On-Site Installation
Capitol Heights 301 350-0980
College Park 301 345-1312
Rockville 301 948-8688
541 Ritchie Rd Capitol Heights 301 350-0980

B T H USED TIRES
Before Making Your Next Tire Purchase, Check The Savings At
BTH USED TIRES
Best Tires Here
- Specializing In Repair Of Flat Tires
- Mount • Balance • Install • Rotate
- Sell Factory Rims • Buy Tires

Major Credit Cards Accepted
Forestville 301 420-5265
8207 Cryden Way Forestville ---------- 301 420-5265

BFGOODRICH TIRES
INTEGRATING ADVANCED MATERIALS, CONSTRUCTION AND DESIGN TECHNOLOGY
BFGoodrich
T/A Tires and other fine passenger and truck tires

AUTHORIZED DEALERS
ANNAPOLIS
PERFORMANCE DISCOUNT TIRE
40HudsonSt Annapolis ---------- 301 970-2111
BURTONSVILLE
PERFORMANCE DISCOUNT TIRE
15412 OldColumbiaPike Burtonsville ---------- 301 384-4141
COLLEGE PARK
MERCHANT'S TIRE & AUTO CENTERS
See Display Ad For Other Listings
8152BaltimoreAv CollegePark ---------- 301 345-5236
PERFORMANCE DISCOUNT TIRE
5001CollegeAv CollegePark ---------- 301 699-0998
GAITHERSBURG
PERFORMANCE DISCOUNT TIRE
8509GrovemontCir Gaithersburg ---------- 301 948-1090
GAMBRILLS
PERFORMANCE DISCOUNT TIRE
1047MDRt3N Gambrills ---------- 301 858-1515
LANDOVER
PERFORMANCE DISCOUNT TIRE
8450Ardwick-ArdmoreRd Landover ---------- 301 772-1400
MARLOW HEIGHTS
PERFORMANCE DISCOUNT TIRE
4712ASt BarnabasRd MarlowHeights ---------- 301 423-6161
ROCKVILLE
PERFORMANCE DISCOUNT TIRE
1301 East GudeDr Rockville ---------- 301 279-5400
11910ParklawnDr Rockville ---------- 301 770-4320
WALDORF
PERFORMANCE DISCOUNT TIRE
7JayGouldCt Waldorf ---------- 301 843-8484
VIRGINIA LOCATIONS
ALEXANDRIA
PERFORMANCE DISCOUNT TIRE
5426EisenhowerAv Alexandria ---------- 703 823-2666
CHANTILLY
PERFORMANCE DISCOUNT TIRE
14220MSullyfieldCircle Chantilly ---------- 703 631-5252
FAIRFAX
PERFORMANCE DISCOUNT TIRE
8217LeeHwy Fairfax ---------- 703 560-6400
ASSOCIATE DEALERS
GAITHERSBURG
BRUCE TIRE CO
7601-IAirparkRd Gaithersburg ---------- 301 670-1111
TIRE WORLD
951 N FrederickAvenue Gaithersburg ---------- 301 948-9400
ROCKVILLE
EXECUTIVE WHOLESALE TIRE
750 East GudeDr Rockville ---------- 301 294-8820

Big Wheel Tires
1219RitchieRd CapitolHeights ---------- 301 350-0403
Branch Used Tires
3300BranchAv TempleHills ---------- 301 894-0220

TIRE DEALERS (Cont'd)

BRIDGESTONE TIRES
BRIDGESTONE
"WHERE TO BUY"
DEALERS
ALEXANDRIA VA
PERFORMANCE DISCOUNT TIRE
5426EisenhowerAv Alexandria ---------- 703 823-2666
ANNAPOLIS MD
PERFORMANCE DISCOUNT TIRE
40HudsonSt Annapolis
Washington Area Tel No ---------- 301 970-2111
BETHESDA MD
SEARS ROEBUCK AND CO ---------- 301 469-4228
BURTONSVILLE MD
PERFORMANCE DISCOUNT TIRE
15412 OldColumbiaPike Burtonsville ---------- 301 384-4141
CHANTILLY VA
PERFORMANCE DISCOUNT TIRE
14220SullyfieldCircle Chantilly ---------- 703 631-5252
COLLEGE PARK
MERCHANT'S TIRE & AUTO CENTERS
See Display For Other Locations
8152BaltimoreAv CollegePark ---------- 301 345-5236
PERFORMANCE DISCOUNT TIRE
5001CollegeAv CollegePark ---------- 301 699-0998
FAIRFAX VA
PERFORMANCE DISCOUNT TIRE
8217LeeHwy Fairfax ---------- 703 560-6400
FREDERICK
TIRE WORLD
951 N FrederickAvenue Gaithersburg ---------- 301 948-9400
GAITHERSBURG MD
...TIRE AND AUTO INC
...FrederickAv Gaithersburg ---------- 301 948-7730
PERFORMANCE DISCOUNT TIRE
8509GrovemontCir Gaithersburg ---------- 301 948-1090
SEARS ROEBUCK AND CO ---------- 301 840-5100
GAMBRILLS MD
PERFORMANCE DISCOUNT TIRE
1047MDRt3N Gambrills ---------- 301 858-1515
HYATTSVILLE
FRIEND'S TIRE & FLEET SERV INC
4800LawrenceSt Hyattsville ---------- 301 779-3334
LANDOVER MD
PERFORMANCE DISCOUNT TIRE
8450Ardwick-ArdmoreRd Landover ---------- 301 772-1400
SEARS ROEBUCK AND CO ---------- 301 322-6284
MARLOW HEIGHTS MD
PERFORMANCE DISCOUNT TIRE
4712AStBarnabasRd MarlowHeights ---------- 301 423-6161
ODENTON MD
FIRESTONE TIRE & SERVICE CENTERS
---------- 410 674-4111
RIVERDALE
FIRESTONE TIRE & SERVICE CENTERS
5731RiverdaleRd ---------- 301 864-5880
ROCKVILLE MD
PERFORMANCE DISCOUNT TIRE
11910ParklawnDr Rockville ---------- 301 770-4320
1301 East GudeDr Rockville ---------- 301 279-5400
WALDORF MD
FIRESTONE TIRE & SERVICE CENTERS
Rt301South Waldorf ---------- 301 645-9224
Or Call Metro No ---------- 301 843-3135
PERFORMANCE DISCOUNT TIRE
7JayGouldCt Waldorf ---------- 301 843-8484
WHEATON
FIRESTONE TIRE & SERVICE CENTERS
11500GeorgiaAv Wheaton ---------- 301 942-8120

Bruce Tire Co
7601AirparkRd Gaithersburg ---------- 301 258-8364
BRUCE TIRE CO
7601-I AirparkRd Gaithersburg ---------- 301 670-1111
BRYANS ROAD TIRE AND AUTO CENTER
BryansRoadShoppingCenter
...Rd ---------- 301 283-3300
Calvert Tire & Auto Service
...Rd ChesapeakeBeach ---------- 301 855-5559
...
...Old...Av Clinton ---------- 301 856-1720

CONTINUED NEXT LISTING PAGE

EMPLOYMENT CONTRACTORS—TEMPORARY HELP

Advertisers may be required to have certificates or to be licensed by the State or Local Municipality. Consumers are advised to check for a valid license or certificate when using the services of these advertisers. For more information, contact your appropriate regulatory agency.

FREE INFORMATION!

InfoTips®

A product of Bell Atlantic®

CALL

301 294-6464

THEN *ENTER THE CODE* FOR CONSUMER INFORMATION ON:

Why Temporary?	5152
Fees	5153
How To Select	5154
Interview Tips	5155

A-1 INSURANCE SERVICES

Temp - Service For

INSURANCE INDUSTRY

Commercial & Personal CSR's - Data Processors - Receptionists

You Name It We Have It

CALL NOW

301-513-0516

6215 Greenbelt Rd
College Park ---------- 301 513-0516

AA Inc
Rockville ---------- 301 881-9500

ABBTECH STAFFING SERVICES

COMPUTER & ENGINEERING SKILLS

- Programmers/Analysts
- Technicians
- Computer Operators
- Drafters
- Desk Top Publishers
- Engineers
- CAD Operators
- Assemblers

30 Yrs.

Matching Skills To Jobs

Serving The Metro Area

Fax 703-406-9261

703-450-5252

101 East Holly Plaza
Sterling Park ---------- 703 450-5252

ADMIN Personnel Services
1112WayneAv SilverSpring ---------- 301 565-3900

AJ BURTON GROUP INC
See Ad Under Employment Agencies
4550MontgomeryAv ChevyChase -- 301 654-0082

EMPLOYMENT CONTRACTORS—TEMPORARY HELP (Cont'd)

ACCOUNTANCY BY ACCOUNTANTS ON CALL

TEMPORARY & PERMANENT STAFFING SPECIALISTS
- Accounting
- Bookkeeping
- Finance

Over 100 Offices Worldwide

aaoc accountants on call®

"FOR ASSISTANCE CALL"

TYSONS CORNER

ACCOUNTANCY BY ACCOUNTANTS ON CALL
8000TowersCrescentDr Vienna ---------- 703 448-7500

WASHINGTON DC

ACCOUNTANTS ON CALL
2775KStNW WashingtonDC ---------- 202 829-0003

BALTIMORE

ACCOUNTANTS ON CALL
201 N CharlesSt Baltimore ---------- 410 685-5700

COLUMBIA

ACCOUNTANTS ON CALL
Columbia ---------- 410 730-7200

ROCKVILLE

ACCOUNTANTS ON CALL ---------- 301 519-2300

ACCOUNTANT-SOURCE TEMPS

ACCOUNTANT SourceTemps

EXPERIENCE ON DEMAND

- STAFF ACCOUNTANTS
- FINANCIAL ANALYSTS
- CONTROLLERS - CFO'S
- PAYROLL
- BOOKKEEPERS
- ACCOUNTING CLERKS

EXCELLENT BENEFITS

CAREER OPTIONS

Maryland ---------- 301-424-2690
D.C. ---------- 202-223-6000
Virginia ---------- 703-790-5610

ACCOUNTEMPS

accountemps.

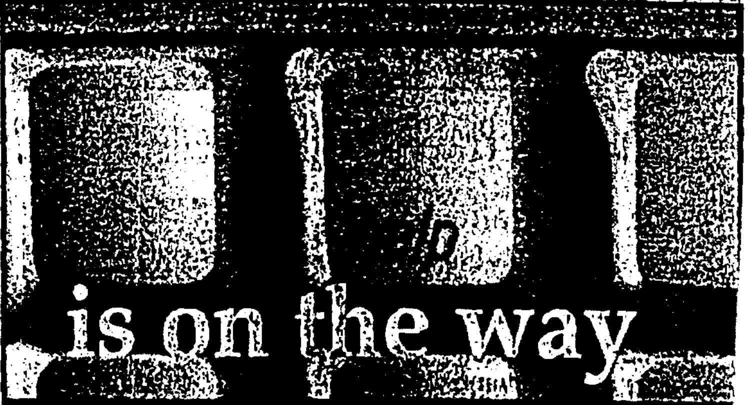
Specialized Financial Staffing™

ACCOUNTING
FINANCE
BOOKKEEPING
DATA ENTRY
CREDIT &
COLLECTIONS

The World's Leading Financial Staffing Specialist℠

Baltimore
100 East Pratt St ---------- 410 385-1600
Rockville
15245 Shady Grove Rd ---------- 301 590-3100
Arlington VA
1100 Wilson Blvd ---------- 703 243-3600
Tysons Corner VA
1951 Kidwell Dr ---------- 703 760-7662

CONTINUED NEXT LISTING PAGE



If you're looking for immediate employment, call now and find out why nearly 40% of our temporary employees are offered full-time jobs.

- Administrative
- Customer Service
- Graphic Art & Design
- Light Industrial/Warehouse
- Legal Secretaries/Paralegal
- Library & Records Management

TELESEC CORESTAFF

Your Keys To Success

Specialty Offices Serving Entire D.C. Metro Area

CreativeCORE 202-530-0940
LegalCORE 202-785-0775
Library Staffing 301-929-2665
Looseleaf Updates 202-223-2650
Records Management 301-949-5076

WHEATON	GREENBELT	FREDERICK	GAITHERSBUR
301-949-9441	301-513-0230	301-663-0353	301-869-5600

SPARKS

PERSONNEL SERVICES, INC.

▶ EXPERT STAFFING SOLUTIONS ◀

TEMPORARY & PERMANENT PLACEMENT SINCE 1970

- *Office Support*
- *Customer Service*
- *Receptionist*
- *Legal Secretarial*
- *Desktop Publishing*
- *Executive Secretarial*

Metro Washington's Largest Regional Staffing Co.

Word Processing Training

web site: sparkspers.com

BETHESDA 301-961-9600	ROCKVILLE 301-926-7800	GREENBEL 301-513-5
WASHINGTON 202-463-5100	COLUMBIA 410-740-8009	FREDERIC 301-663-0
TYSONS 703-821-1911	RESTON 703-620-6444	FALLS CHU 703-207-9