TAB 1

AFFIDAVIT OF DR. AUGUST H. ANKUM

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Joint Application by SBC Communications Inc.,	)	
Illinois Bell Telephone Company, Indiana Bell	)	
Telephone Company Incorporated, The Ohio	)	
Bell Telephone Company, Wisconsin Bell, Inc.,	)	WC Docket No. 03-167
and Southwestern Bell Communications	)	
Services, Inc. for Provision of In-Region,	)	
InterLATA Services in Illinois, Indiana, Ohio	)	
and Wisconsin	)	

AFFIDAVIT OF DR. AUGUST H. ANKUM

Dated: August 6, 2003

AFFIDAVIT OF
DR. AUGUST H. ANKUM

STATE OF ILLINOIS §
§
COUNTY OF COOK §

Qualifications

My name is Dr. August H. Ankum. I am of sound mind, have never been convicted of a felony, am capable of making this affidavit, am over eighteen (18) years of age, and am fully competent to testify to the matters stated herein. I have personal knowledge of each of the facts stated herein, and each is true and correct.

1. I am a Senior Vice President at QSI Consulting, Inc., a consulting firm specializing in economics and telecommunications issues, and my business address is 1261 North Paulina, Suite No. 8, Chicago, Illinois 60622.

2. I received a Ph.D. in Economics from the University of Texas at Austin in 1992, an M.A. in Economics from the University of Texas at Austin in 1987, and a B.A. in Economics from Quincy College, Illinois, in 1982.

3. My professional background includes work experience in private industry and before state regulatory agencies. As a consultant, I have worked with large companies, such as AT&T, AT&T Wireless and WorldCom, Inc., as well as with smaller carriers, including a variety of competitive local exchange carriers ("CLECs") and wireless carriers. I have worked on many of the arbitration proceedings between new entrants and incumbent local exchange carriers ("ILECs"). Specifically, I have been involved in arbitrations between new entrants and Verizon, Bell Atlantic, US West, BellSouth, SBC, and Puerto Rico Telephone. Prior to practicing as a telecommunications consultant, I worked for MCI Telecommunications Corporation ("MCI") as a senior economist. At MCI, I provided expert witness testimony and conducted economic analyses for internal purposes. Before I joined MCI in early 1995, I worked for Teleport Communications Group, Inc. ("TCG"), as a Manager in the Regulatory and External Affairs Division. In this capacity, I testified on behalf of TCG in proceedings concerning local exchange competition issues, such as Ameritech's Customer First proceeding in Illinois. From 1986 until early 1994, I was employed as an economist by the Public Utility Commission of Texas ("PUCT") where I worked on a variety of electric power and telecommunications issues. During my last year at the PUCT, I held the position of Chief Economist. Prior to joining the PUCT, I taught undergraduate courses in economics as an Assistant Instructor at the University of Texas from 1984 to 1986.

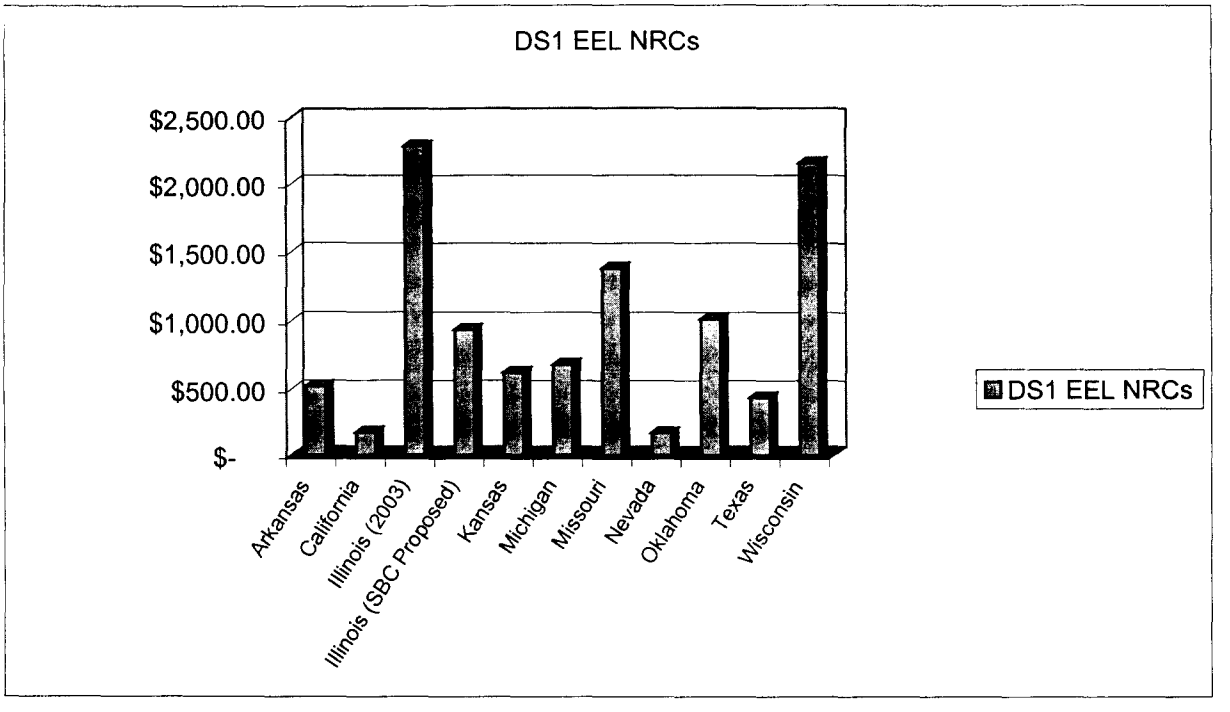
4. My Curriculum Vita is attached hereto as AHA-2.

SBC's NRCs for EELs Are Significantly Above Those In Other States and Above SBC's TELRICs for NRCs as Proposed by SBC in Illinois

5. The purpose of this affidavit is to demonstrate that SBC's currently tariffed NRCs for New EELs in Illinois are significantly above TELRIC, both in terms of their relative magnitude vis-à-vis TELRIC based NRCs in other states and relative to TELRIC based NRCs as calculated for Illinois.

6. The bar graph below shows the comparison with NRCs in other states and with the NRCs recently proposed by SBC itself in ICC Docket 02-0864. The EEL for which the NRCs were compared consists of a 4-Wire Digital Loop to DS1 Level Transport without collocation and without Clear Channel capability.[1] The analysis assumes that service orders are submitted electronically. It is clear from this graph that SBC's NRCs for EELs in Illinois are too high.

7. A detailed discussion of the basis for the comparison between SBC's NRCs for EELs in Illinois with those in other states and with SBC's TELRICs for NRCs as presented in a recent proceeding in Illinois is found in the attached report ("QSI Report") and supporting Excel workbook, attached hereto as AHA-1.



[1] As discussed in the QSI report, while the analysis and rate comparisons concern the EEL with a 4-Wire Digital Loop to DS1 Dedicated Transport, the rate differentials are consistent with EELs of different levels of capacity. As such, the results presented here are representative of SBC's NRCs for EELs in Illinois.

8. For purposes of the analysis in this document, NRCs for EELs are viewed as recovering the costs of service ordering and service provisioning of the loop, transport and cross-connect and multiplexing components of the EEL. This definition follows the definitions provided by SBC itself in ICC Docket 02-0864.

9. The attached QSI Report provides support for the claim that SBC's NRCs for EELs in Illinois are too high based on the following facts and analyses:

   a. SBC's NRCs for EELs in Illinois are significantly higher than those in other SBC states. No explanation has been offered for these disparities; therefore, either the rates in the other SBC states are well below TELRIC costs, or (much more likely), the rates in Illinois are much above TELRIC costs.

   b. SBC's currently tariffed NRCs for EELs are significantly higher than the TELRIC costs advocated by SBC itself in its testimony in ICC Docket 02-0864.

   c. SBC's NRCs for EELs should be evaluated on a standalone basis and not in combination with the recurring charges for EELs in Illinois, which because they are low relative to recurring charges in other states would disguise the problems with the NRCs.

10. The summary results of the analysis performed in the QSI Report are as follows:

State		DS1 EEL NRCs	SBC Illinois EEL NRCs relative to NRCs in other states
Arkansas	$	523.37	437%
California	$	173.10	1321%
Illinois (2003)	**$**	**2,285.85**	**100%**
Illinois (SBC Proposed)	$	937.58	244%
Kansas	$	627.90	364%
Michigan	$	685.18	334%
Missouri	$	1,384.58	165%
Nevada	$	173.10	1321%
Oklahoma	$	1,018.05	225%
Texas	$	440.25	519%

11. As the above table shows, SBC's NRCs for EELs in Illinois are significantly higher than those in other states. For example, the EEL NRCs in Illinois are an astonishing 1321 percent and 519 percent of the NRCs in two other SBC states, California and Texas, respectively.

Conclusion

12. For all the above reasons, it is clear that SBC's NRCs for EELs in Illinois are significantly above TELRIC.

This concludes my statement.

Dr. August H. Ankum

STATE OF ILLINOIS §
§
COUNTY OF Cook §

Subscribed and sworn to before me, Elaine McDaniels, this 5 day of August, 2003.

Elaine McDaniels
Notary Public

"OFFICIAL SEAL"
Elaine McDaniels
Notary Public, State of Illinois
My Commission Expires May 15, 2006

(Notary Seal)

"OFFICIAL SEAL"
Elaine McDaniels
Notary Public, State of Illinois
My Commission Expires May 15, 2006

AHA-1

SBC'S NRCs FOR EELs IN ILLINOIS
Analysis performed by QSI for GlobalCom

August 6, 2003

SBC'S NRCs FOR EELs IN ILLINOIS
Analysis performed by QSI for GlobalCom

August 6, 2003

Prepared by:
August H. Ankum, Ph.D
James Webber

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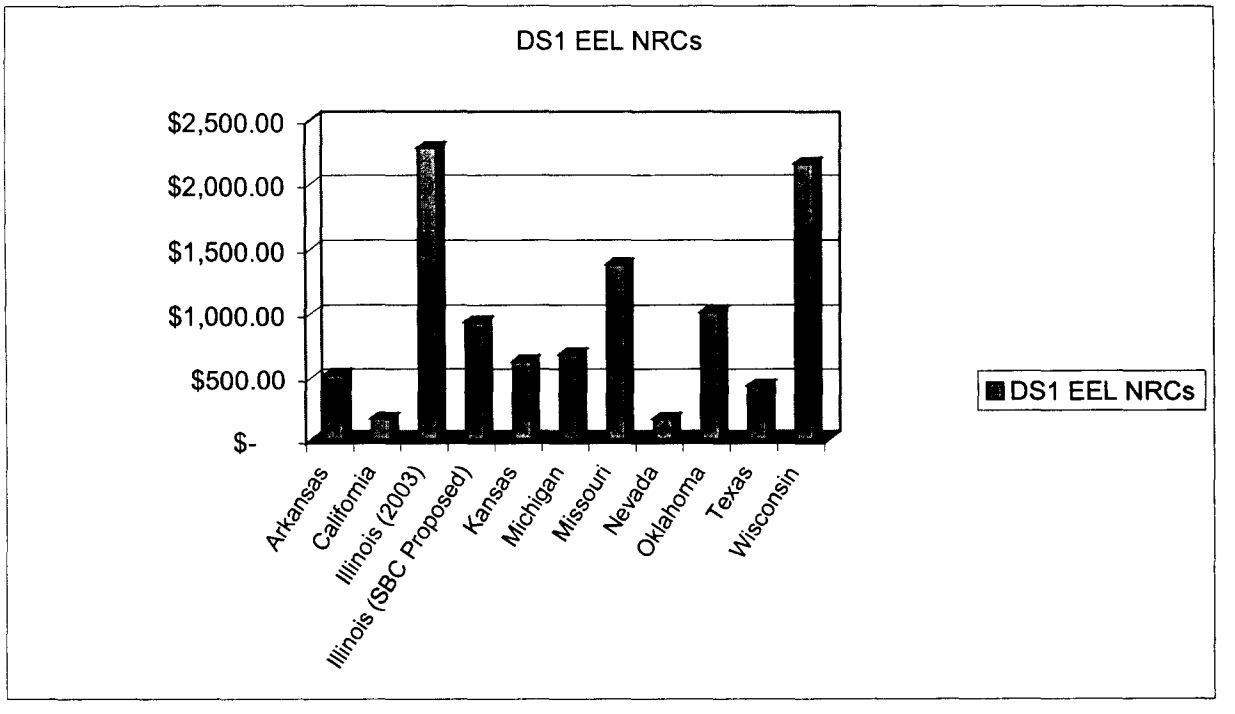
I. INTRODUCTION AND SUMMARY

SBC's currently tariffed NRCs for New EELs in Illinois are significantly above TELRIC, both in terms of their relative magnitude vis-à-vis TELRIC based NRCs in other states and relative to appropriately TELRIC based NRCs as calculated for Illinois.

The bar graph below shows the comparison with NRCs in other states and with the NRCs recently proposed by SBC itself in ICC Docket 02-0864.[1] The EEL for which the NRCs were compared consists of a 4-Wire Digital Loop to DS1 Level Transport without collocation and without Clear Channel capability. The analysis assumes that service orders are submitted electronically. It is clear from this graph that SBC's NRCs for EELs in Illinois are too high.



For purposes of the analysis in this document, NRCs for EELs are viewed as recovering the costs of service ordering and service provisioning of the loop, transport and cross-connect and multiplexing components of the EEL. This definition follows the definitions provided by SBC itself in ICC Docket 02-0864.

Further, the analyses performed in this document follow the FCC's convention of comparing tariffed rates in one state to those that prevail in other states where such a

[1] The details of this graph are discussed below. The graph is taken from the attachment, which contains all the underlying data and calculations in Excel.

comparison is reasonable. Specifically, in CC Docket No. 01-9, paragraph 28, the FCC found:

> We find that it is permissible to rely on the New York rates in this application because they meet the criteria the Commission established in the *SWBT Kansas/Oklahoma Order*. In the *SWBT Kansas/Oklahoma Order*, to determine whether Oklahoma rates were within the ***range of what a reasonable*** application of what TELRIC would produce, the Commission compared SWBT's rates in Oklahoma to its rates in Texas. The Commission stated this was permissible because: 1) they have a common BOC and geographic similarities; 2) they have similar, although not identical, rate structures for comparison purposes; and 3) the Commission had already found the rates in Texas to be reasonable.[2] Applying this standard to Verizon's Massachusetts rates, we find that New York is a permissible state for UNE rate comparison purposes. The states are adjoining, they have similar rate structures, the Commission has found the New York rates are within a zone that is consistent with TELRIC based on current information in the record, and it is the same BOC in both states. (Emphasis added.)

This document provides support for the claim that SBC's NRCs for EELs in Illinois are too high based on the following facts and analyses:

1. SBC's NRCs for EELs in Illinois are significantly higher than those in other SBC states. No explanation has been offered for these disparities; therefore, either the rates in the other SBC states are well below TELRIC costs, or (much more likely), the rates in Illinois are much above TELRIC costs.

2. SBC's currently tariffed NRCs for EELs are significantly higher than the TELRIC costs advocated by SBC itself in its testimony in ICC Docket 02-0864.

3. SBC's NRCs for EELs should be evaluated on a standalone basis and not in combination with the recurring charges for EELs in Illinois, which because they are low relative to recurring charges in other states would disguise the problems with the NRCs.

In what follows, each of these issues is discussed in more detail.

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2 *SWBT Kansas/Oklahoma Order* at para. 82.

II. SBC'S NRC'S FOR EELS IN ILLINOIS ARE SIGNIFICANTLY HIGHER THAN THOSE IN OTHER SBC STATES

SBC's NRCs for EELs in Illinois were compared to SBC's NRCs for EELs in other states. For purposes of this analysis, the EEL consists of a 4-Wire Digital Loop connected to a DS1 Level Dedicated Transport link without collocation and without Clear Channel capability.[3] As noted previously, the NRCs include the service ordering and service provisioning NRCs. Further, the NRCs are calculated based on the assumption that service orders are submitted by the CLEC through electronic interfaces.

The results of that comparison are as follows.

State	DS1 EEL NRCs		SBC Illinois EEL NRCs relative to NRCs in other states
Arkansas	$	523.37	437%
California	$	173.10	1321%
Illinois (2003)	**$**	**2,285.85**	**100%**
Illinois (SBC Proposed)	$	937.58	244%
Kansas	$	627.90	364%
Michigan	$	685.18	334%
Missouri	$	1,384.58	165%
Nevada	$	173.10	1321%
Oklahoma	$	1,018.05	225%
Texas	$	440.25	519%

As the above table shows, SBC's NRCs for EELs in Illinois are significantly higher than those in other states. For example, the EEL NRCs in Illinois are an astonishing *1321 percent and 519 percent of the NRCs in two other SBC states, California and Texas, respectively.*

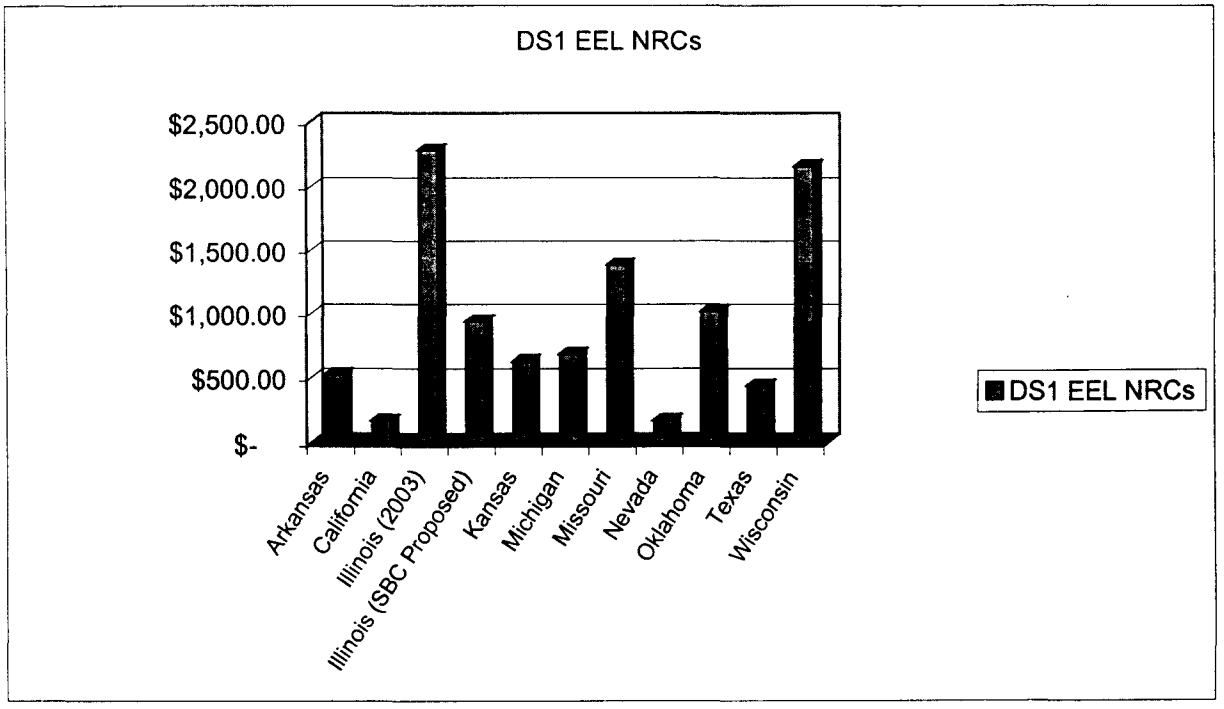
There is simply no reasonable explanation for a discrepancy of this magnitude given the nature of the costs and activities involved in service ordering and service provisioning. Of course, the TELRICs supporting recurring charges for EELs (loops and transport) will reasonably vary from state to state depending on such issues as population density, loop lengths, and other cost drivers. None of these issues, however, affect the NRCs.

The NRCs recover the costs of *service ordering* and the cost of *service provisioning.* Service ordering costs consist in an efficient setting of the costs of electronically placed orders.[4] Service provisioning costs consist almost entirely of the labor costs for

[3] While the analyses presented herein focus upon this particular type of EEL, because it is the one predominantly used by Globalcom, the analyses are not significantly different for other types of EELs.
[4] SBC's NRC cost studies in Illinois are discussed in more detail below.

establishing cross-connects at various locations, travel to get to those locations (end-user premises and unmanned central offices) and testing (of various types) of the cross-connects and newly connected facilities. Except for travel times, which may vary minimally from state to state, there is no reason for why these costs should be different in one state versus another.[5] This is particularly true for SBC states that share service ordering centers, such Illinois and Michigan, where the service ordering costs should practically be identical. In short, SBC's NRCs for EELs ought to be reasonably comparable.

The numeric comparison discussed above is graphically represented by the following bar graph:



The data underlying the results and the bar graph are found in the Excel workbook labeled as Attachment I to this document.

It must be noted that while the analysis was performed for the NRCs for EELs consisting of a 4-Wire Digital Loop to DS1 Level Transport, the pattern for EELs of different levels of capacity is approximately the same. That is, the above results are representative for all of SBC's NRCs related to EELs.

[5] While it is true that labor rates may differ from state to state, labor rates in Illinois are not significantly different from labor rates in, say, California. Further, whatever labor rate differences may exist, they in no way could explain the vast discrepancies and variations in the NRCs.

The possible configurations of EELs for which SBC's NRCs in Illinois are higher than TELRIC can be summarized as follows:

2-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Collocated
4-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Collocated
2-Wire Digital Loop to DS1 or DS3 Dedicated Transport Facilities - Collocated
4-Wire Digital Loop (DS1 Loop) to DS1 or DS3 Dedicated Transport Facilities – Collocated

2-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated
4-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated
2-Wire Digital Loop to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated
4-Wire Digital Loop (DS1 Loop) to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated

Again, this document reports only on NRCs for the 4-Wire Digital Loop to DS1 Level Dedicated Transport - Non-Collocated and without Clear Channel capability.

Using the FCC's zone of reasonableness analysis -- as discussed previously -- it must be concluded that SBC's NRCs for EELs in Illinois are significantly higher than TELRIC.

III. SBC'S CURRENTLY TARIFFED NRCS FOR EELS ARE SIGNIFICANTLY HIGHER THAN THOSE PROPOSED BY SBC ITSELF IN ITS TESTIMONY IN ICC DOCKET 02-0864

SBC recently filed newly proposed NRCs for EELs and other UNEs in ICC Docket 02-0864. While the docket was prematurely abated, SBC had filed its affirmative case and intervenors did have an opportunity to examine SBC's newly proposed costs and rates.[6] SBC's newly proposed NRCs in Illinois, therefore, provide yet another benchmark for how reasonable or not reasonable SBC's currently tariffed NRCs might be.

A. Even SBC's Own Uncorrected Studies in Illinois Show Significantly Lower NRCs for EELs

SBC's own studies filed in ICC Docket 02-0864 show NRCs for EELs that are approximately 41 percent of the currently tariffed NRCs for EELs. The two tables below show the various rate elements under the current tariff and as filed by SBC in ICC Docket 02-0864.

As the tables show, the rate elements do not match up precisely since SBC proposed to change the rate structure. The bottom line totals for the 4-Wire Digital Loop to DS1 Dedicated Transport EEL without collocation and without Clear Channel capability are calculated consistent with the testimony filed by SBC itself. Specifically, the rate structure and the applicable rates for SBC's current NRCs for EELs in Illinois are taken from the testimony of SBC witness Michael D. Silver.[7] It must be noted, however, that SBC's current tariff is ambiguous on which NRCs do apply.[8]

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[6] The proceeding was prematurely abated as a result of legislative action that was found to be illegal by a Federal District Court. See *Voices for Choices v. Illinois Bell Tel. Co.*, No. 03 C 3290, 2003 U.S. Dist. LEXIS 9548 (N.D. Ill. June 9, 2003) (Kocoras, J.) *appeals pending*, Nos. 03-2735 & 03-2766.

[7] *See* ICC Docket 02-0864, Testimony of SBC witness M. D. Silver, Exhibit MDS 12.

[8] Ameritech Illinois Tariff, ILL. C.C. No. 20, Part 19, Section 20, 3rd Revised Sheet appears to suggest that there would be only three rate elements: administration charge, design and C.O. connection charge and a carrier connection charge. The analysis in this document, however, has followed the testimony of M.D. Silver.

Currently Tariffed NRCs 4-Wire Digital Loop to DS1 Dedicated Transport

Loop		
	Admin	$ 142.93
	Design and CO Connection	$ 332.61
	Carrier Connection	$ 185.48
Transport		
	Admin	$ 406.61
	Design and CO Connection	$ 632.71
	Carrier Connection	$ 585.51
	Total (excluding clear channel)	***$ 2,285.85***
	Clear Channel	$ 443.18

SBC Proposed NRCs 4-Wire Digital Loop to DS1 Dedicated Transport - Docket 02-0864[9]

Loop		
	Non Channelized DS1 SO	$ 78.75
Transport		
	4-Wire DS1 Loop to DS1 Transport	$ 858.83
	Total (excluding clear channel)	**$ 937.58**
	Clear Channel	$ 150.42

Thus, as the above comparison shows, SBC itself has testified that its current rates are approximately *2.4 times* what SBC contends are its TELRIC costs.

B. SBC's Current NRCs for EELs Appear Even More Unreasonable Compared to SBC's Newly Proposed NRCs in Illinois After Those NRC Studies Are Corrected for Non-Compliance with ICC Orders

The above comparison between SBC's current NRCs and the NRCs it proposed in Docket 98-0396 does not consider, however, that SBC's newly proposed NRCs for EELs

[9] These NRCs are based on the testimony of SBC witness M.D. Silver in ICC Docket No. 02-0864, Exhibit 12.

were not adjusted downward yet to correct for some of the ICC's instructions regarding SBC's NRC studies in Docket 98-0396.

In Docket 98-0396, the ICC had previously reviewed and rejected Ameritech's NRC studies. Those studies were rejected because they did not comply with previous ICC Orders, and for a number of other important reasons identified and discussed in the ICC's Final Order in Docket 98-0396. Review of SBC's new NRC studies has shown that the company has yet again failed to implement the ICC's Orders. It is worthwhile to briefly recapitulate the ICC's more important findings in Docket 98-0396 regarding required assumptions that should have -- but did not -- form the basis for SBC's NRC studies. Indeed, SBC ignored virtually all of the explicit ICC findings listed below.[10]

OSS Enhancements, Flow-Through and Fall-Out Rates

-- NRC studies should "take into consideration the increased flow through that should result from the OSS enhancements being implemented pursuant to Ameritech's merger agreement."

-- NRC studies should assume -- not manual intervention -- but rather "the use of primarily automated interfaces."

-- SBC should change "a single assumption, that orders would be placed through a fully automated process."

-- SBC should "provide [...] written reports or other support for its flow through rates and [...] use a single fallout factor for the complete end-to-end connect/disconnect processes; rather than view each process step in isolation.

Use of Existing Network Architecture and Process in Studies

-- NRC studies should not be "based on [SBC's] existing network architecture and processes and incorporate only those technologies and process improvements that [SBC] actually plans to deploy in the next three years. This is the antithesis of a forward looking cost study [...] because it encompasses actual rather than forward looking technologies and processes.

Clean-Up of legacy Databases

-- SBC's NRC studies should make "adjustment for [SBC] cleaning up and then maintaining its databases to eliminate fallout caused by database contamination."

[10] *See Illinois Commerce Commission On Its Own Motion, Investigation into the Compliance of Illinois Bell Telephone Company with the Order in Docket 96-0486/0569 Consolidated Regarding the Filing of Tariffs and the Accompanying Cost studies for Interconnection, Unbundled Network Elements and Local Transport and Termination and Regarding End to End Bundling Issues*, Docket No. 98-0396, Order, at 39-42 (Ill. C.C. Oct. 16, 2001).

-- SBC NRC studies should perform a "root cause analyses to seek out and resolve problems causing fallout [and] distinguish between fallout resolution costs and the costs associated with planned/designed manual intervention due to fallout."

Computer Processing Costs

-- SBC "should eliminate the computer processing costs it applies per service order. These costs are not a direct cost to a CLEC ordering a UNE."

SME Work Times Estimates

-- Work times in SBC's cost studies should be adequately supported and not be "based on subjective SME interviews."

-- SBC should "provide very specific backup information, including identification and documentation of forward looking workflows, identification of estimators, the development of detailed written estimation instructions, provisions for averaging the individual estimates, development of documentation, etc."

As noted, SBC failed to incorporate these findings into its current NRC studies. In fact, it was "déjà vu all over again," with SBC challenging the ICC and the parties to yet another exhausting round of litigation on the very same issues.

In Docket 98-0396, the ICC found that "Ameritech's failure to comply with our directives results in nonrecurring charges that are *severely inflated*."

SBC's failure to comply with the ICC's previous orders and to file studies that are consistent with TELRIC was pervasive.

QSI Consulting, Inc., on behalf of a coalition of CLECs,[11] examined and corrected SBC's NRC studies. Implementing the ICC's previous orders on NRCs (as discussed above), QSI calculated rates for the 4-Wire Digital Loop to DS1 Level dedicated Transport EEL that were considerably lower. As found in Attachment 3 to the QSI (Ankum/Morrison panel) testimony, the comparison between SBC's newly proposed NRCs and the QSI/CLEC corrected SBC NRCs is as found below:

[11] MCI, Inc., McLeodUSA Telecommunications Services, Inc., Covad Communications Company, TDS Metrocom, LLC, Allegiance Telecom of Illinois, Inc., RCN Telecom Services of Illinois, LLC, Globalcom, Inc., Z-Tel Communications, Inc., and XO Communications, Inc.

-	- - - -	SBC	QSI/CLECs
Loop			
	Non Channelized DS1 SO	$ 78.75	$ 1.62
Transport			
	4-Wire DS1 Loop to DS1 Transport	$ 858.83	$ 191.95
	Total (excluding clear channel)	**$ 937.58**	**$ 193.57**
	Clear Channel	$ 150.42	$ 6.84

Because of flaws in SBC's TELRIC studies, they grossly overstate actual TELRIC costs. When appropriate adjustments are made (as recommended by QSI), it can be seen that actual TELRIC costs are far lower than shown by SBC's studies, making the tariffed rates even more out of line with TELRIC costs. In fact, based on QSI's recalculation of SBC's newly proposed NRCs, SBC's currently tariffed NRCs for EELs in Illinois are about *11 times higher* than TELRIC based rates ($2,285.85 versus $193.57).

IV. SBC'S NRCS FOR EELS SHOULD BE EVALUATED ON A STANDALONE BASIS AND NOT IN COMBINATION WITH THE RECURRING CHARGES FOR EELS IN ILLINOIS

In Docket No. 01-0662, SBC's 271 Application in Illinois, SBC presented an analysis that combined the NRCs and the monthly recurring charges ("MRCs") for EELs.[12] This type of an analysis is inappropriate. In fact, it is important that an analysis of whether SBC's NRCs are within a zone of reasonableness is performed on a standalone basis. The costs recovered in the NRCs are fundamentally different and separate from the cost recovered by the recurring charges. To combine the analysis of NRCs with MRCs would allow for a serious cross-subsidization between disparate activities and investments that is at odds with TELRIC.

As noted above, NRCs recover the costs of *service ordering* and the cost of *service provisioning.* Service ordering costs consist in an efficient setting of the costs of electronically placed orders with a 2% fall out approved by the ICC.[13] Service provisioning costs consist almost entirely of the labor costs for establishing cross-connects at various locations, travel to get to those locations (end-user premises and unmanned central offices) and testing (of various types) of the cross-connects and newly connected facilities.

By contrast, the MRCs recover the costs, such as maintenance, depreciation, and cost of capital, of the physical *loop and transport facilities.* These cost categories are very different from the service ordering and service provisioning cost categories and activities. Thus, to combine the NRCs and the MRCs for EELs is to permit serious cross-subsidization between disparate activities and investments.

Further, an observation that SBC's MRCs in IL may be lower relative to those in other states has no impact whatsoever on what appropriate TELRIC based NRC costs should be. There is no evidence to suggest, nor has SBC pointed to any, that costs that would ordinarily be treated as recurring (e.g. in other states) have been shifted into the NRC category in Illinois. In terms of meeting the FCC's requirement that its UNE rates comply with TELRIC, the fact that the MRCs in Illinois are relatively low, therefore, does not justify an above-TELRIC NRC any more than a low port rate would justify a high loop rate.

[12] *See* ICC Docket No. 01-0662, Phase IA Compliance Affidavit of M.Silver on Behalf of SBC-IL, at ¶¶ 10-14 and Revised Attachment MDS-2.
[13] For a discussion of why SBC's NRCs do not comply with the ICC's 2% fall out requirement, see the previous section.

AHA-1 ATTACHMENT 1
(11 pages)

State		DS1 EEL NRCs	SBC Illinois EEL NRCs relative to NRCs in other states
Arkansas	$	523.37	437%
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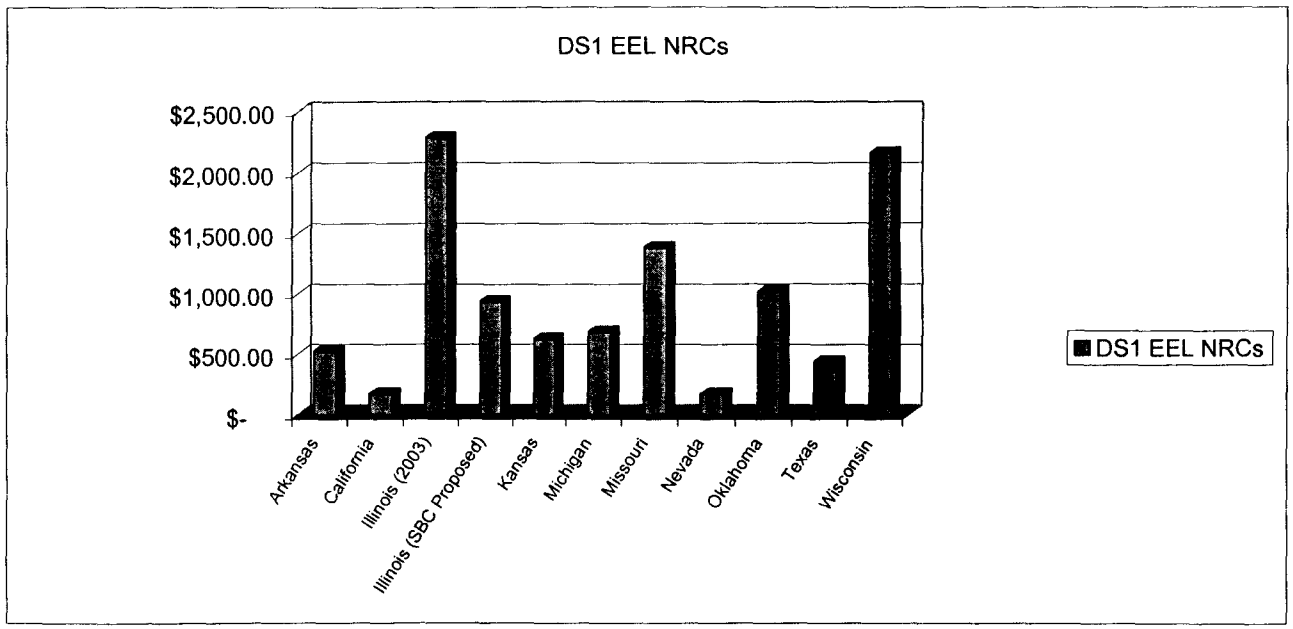
Illinois (2003)	$	2,285.85	100%
Illinois (SBC Proposed)	$	937.58	244%
Kansas	$	627.90	364%
Michigan	$	685.18	334%
Missouri	$	1,384.58	165%
Nevada	$	173.10	1321%
Oklahoma	$	1,018.05	225%
Texas	$	440.25	519%
Wisconsin	$	2,159.08	106%



Arkansas DS1 EEL (NRCs)

		Rate
DS1 Loop	$	68.40
DS1 Cross Connect	$	73.88
DS1 Loop Order	$	2.35
UDT DS1 EF	$	165.86
DS1 Cross Connect	$	73.88
DS1 Transport Order	$	2.35
UDT DS1 Transport	$	136.65
Total	**$**	**523.37**

California DS1 EEL (NRCs)

	DS1 Loop		DS1 Transport		
Order Type	**Service Order**	**Channel Connect**	**Service Order**	**Channel Connect**	***Total NRC***
Mannual - Fax	$ 63.06	$ 104.59	$ 72.75	$ 67.62	*$ 308.02*
Semi-mechanized	$ 35.09	$ 104.59	$ 46.65	$ 67.62	*$ 253.95*
Mechanized	**$ 0.16**	**$ 104.59**	**$ 0.73**	**$ 67.62**	***$ 173.10***

The NRCs for DS1 EELs in California are comprised of the following Charges: Digital Trunk DS1 Service Order at $0.73; Digital Trunk DS1 Connect at $67.62; Digital DS1 Link Service Order at $0.16; and, Digital DS1 Connect $104.59. Each of these individual rate elements are taken from the table entitled PACFIC BELL TELEPHONE COMPANY D/B/A SBC CALIFORNIA NON-RECURRING JUNE 12, 2003, which is available for downloading at https://clec.sbc.com/clec/shell.cfm?section=115#California, SBC's vendor website. Additionally, these NRCs are the same as those contained in Scenario No. 7 of Appendix A II to Attachment 8: Pricing of the Interconnection Agreement between AT&T and Pacific Bell, which is also available for downloading at CLEC Online. SBC witness Silver, however, has estimated these charges to be almost $30 higher than as presented in this table. Specifically, Witness Silver indicated at Revised Attachment MDS-2D (page 5) in ICC Docket 01-0662 suggests the charges would total $207.18.

"Current" Rate Structure - Per Ameritech's "recent" interpretation of tariff

Loop		
	Admin	$ 142.93
	Design and CO Connection	$ 332.61
	Carrier Connection	$ 185.48
Transport		
	Admin	$ 406.61
	Design and CO Connection	$ 632.71
	Carrier Connection	$ 585.51
	Clear Channel	$ 443.18
	Total (excluding clear channel)	***$ 2,285.85***

Proposed Rate Structure and Amounts

Loop		
	Non Channelized DS1 SO	$ 78.75
Transport		
	4-Wire DS1 Loop to DS1 Transport	$ 858.83
	Clear Channel	$ 150.42
	Total (excluding clear channel)	**$ 937.58**

Kansas DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	68.40	U4D1X
DS1 Cross Connect	$	98.50	UCXHX
DS1 Loop Order	$	2.35	NR9W2
UDT DS1 EF	$	221.15	UENHX
DS1 Cross Connect	$	98.50	UCXHX
DS1 Transport Order	$	2.35	NR9W2
UDT DS1 Transport	$	136.65	ULNHS
Total	**$**	**627.90**	

Michigan EEL (NRCs)

	Rate	USOC
DS1 Loop Admin	$ -	NR90R
Loop Design and CO Connection	$ -	NR90U
Loop Carrier Connection	$ -	NR90W
Transport Admin	$ 136.82	ORCMX
Transport Design and CO Connection	$ 339.17	NRBCL
Transport Carrier Connection	$ 209.19	NRBBL
Total	**$ 685.18**	

Missouri DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	136.63	U4D1X
DS1 Cross Connect	$	229.05	UCXHX
DS1 Loop Order	$	5.00	NR9W2
UDT DS1 EF	$	324.50	UENHX
DS1 Cross Connect	$	229.05	UCXHX
DS1 Transport Order	$	5.00	NR9W2
UDT DS1 Transport	$	455.35	ULNHS
Total	**$**	**1,384.58**	

See PUCN Order approving stipulation between Nevada Bell Telephone, et. al, which approves a stipulation between the parties wherein NRCs for Nevada UNEs will be set equal to the prices approved in the Californaia OANAD proceedings, Docket No. 99--11-050.

Total DS1 NRCs $ 173.10

Oklahoma DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	220.25	U4D1X
DS1 Cross Connect	$	101.70	UCXHX
DS1 Loop Order	$	3.33	NR9W2
UDT DS1 EF	$	285.81	UENHX
DS1 Cross Connect	$	101.70	UCXHX
DS1 Transport Order	$	3.33	NR9W2
UDT DS1 Transport	$	301.93	ULNHS
Total	**$**	**1,018.05**	

Texas DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	73.25	U4D1X
DS1 Cross Connect	$	57.08	UCXHX
DS1 Loop Order	$	2.58	NR9W2
UDT DS1 EF	$	73.25	UENHX
DS1 Cross Connect	$	57.08	UCXHX
DS1 Transport Order	$	2.58	NR9W2
UDT DS1 Transport	$	174.43	ULNHS
Total	**$**	**440.25**	

Wisconsin Rate Structure

Loop			
	Admin	$	138.62
	Design and CO Connection	$	433.60
	Carrier Connection	$	179.90
Transport			
	Admin	$	346.87
	Design and CO Connection	$	543.56
	Carrier Connection	$	516.53
	Clear Channel	$	271.14
	Total (excluding clear channel	***$***	***2,159.08***

The NRCs referenced above are required pursuant to P.S.C. of W. 20, Part 19, Section 22, Sheet 5. See http://www.sbc.com/Large-Files/RIMS/Wisconsin/Tariff_No._20/wi201922.pdf. The Admin, Design and CO Connection, and Carrier Connection NRCs associated with the Loop are set forth in P.S.C. of W. 20, Part 19, Section 2, Sheet 36, and are available at http://www.sbc.com/Large-Files/RIMS/Wisconsin/Tariff_No._20/wi201902.pdf. The Admin, Design and CO Connection, and Carrier Connection NRCs associated with the Transport are set forth in P.S.C. of W. 20, Part 19, Section 12, Sheet 27-28, and are available at http://www.sbc.com/Large-Files/RIMS/Wisconsin/Tariff_No._20/wi201912.pdf. Although the Clear Channel NRC was not included in the above total, that rate can be found in the WI Pricing Sched UNE All Traffic that SBC posts on its website. Available at https://clec.sbc.com/clec/shell.cfm?section=115#Wisconsin.

AHA-2 ATTACHMENT 2

Curriculum Vitae of Dr. August H. Ankum
(10 Pages)

Curriculum Vitae

August H. Ankum, Ph.D.
Senior Vice-President
QUANTITATIVE SOLUTIONS, INC
Economics and Telecommunications Consulting
1261 North Paulina, Suite 8
Chicago, IL 60622
Phone: 773.645.0653 Fax: 773.645.0705

I am an economist and consultant, specializing in public utility regulation. In this capacity, I have provided consulting services in the major telecommunications markets of the United States, such as New York, Texas, Illinois, Michigan, Tennessee, Georgia, and in a variety of smaller states. My consulting activities focus mostly on telecommunications regulation. Specifically, I work with large corporate clients, such as MCIWorldCom, AT&T, AT&T Wireless, and a variety of smaller competitive local exchange carriers and PCS providers. I have represented these clients before state and federal regulatory agencies in various proceedings concerning the introduction of competition in telecommunications markets. Recently, these proceedings focus largely on the implementation of the pro-competition provisions of Telecommunications Act of 1996.

Professional experience:

My professional background includes work experiences in private industry and state government. I have worked for MCI Telecommunications Corporation ("MCI") as a senior economist. At MCI, I provided expert witness testimony and conducted economic analyses for internal purposes. Prior to joining MCI in early 1995, I worked for Teleport Communications Group, Inc. ("TCG"), as a Manager in the Regulatory and External Affairs Division. In this capacity, I testified on behalf of TCG in proceedings concerning local exchange competition issues. From 1986 until early 1994, I was employed as an economist by the Public Utility Commission of Texas ("PUCT") where I worked on a variety of electric power and telecommunications issues. During my last year at the PUCT I held the position of chief economist. Prior to joining the PUCT, I taught undergraduate courses in economics as an Assistant Instructor at the University of Texas from 1984 to 1986.

Education:

I received a Ph.D. in Economics from the University of Texas at Austin in 1992, an M.A. in Economics from the University of Texas at Austin in 1987, and a B.A. in Economics from Quincy College, Illinois, in 1982.

PROCEEDINGS IN WHICH DR. ANKUM HAS FILED EXPERT WITNESS TESTIMONY:

New York

Commission Investigation into Resale, Universal Service and Link and Port Pricing, New York Public Service Commission, Case Nos. 95-C-0657, 94-C-0095, and 91-C-1174, July 4, 1996. On behalf of MCI Telecommunications Corporation.

In the Matter of Proceeding on Motion of the Commission To Reexamine Reciprocal Compensation, New York Public Service Commission, Case 99-C-0529. Direct Testimony, July 1999. On Behalf Of Cablevision LightPath, Inc.

Proceeding on the Motion of the Commission To Examine New York Telephone Company's Rates for Unbundled Network Elements, New York Public Service Commission, Case 98-C-1357. Direct Testimony, October 1999. On behalf of Corecomm New York, Inc.

Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements, New York Public Service Commission Case 98-C-1357, Direct Testimony, June 2000, on behalf of MCIWorldCom.

New Jersey

Petition of Focal Communications Corporation of New Jersey For Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Bell Atlantic – New Jersey Board of Public Utilities, May 2000. On behalf of Focal Communications Corporation of New Jersey.

I/M/O the Board's Review of Unbundled Network Elements Rates, Terms and Conditions of Bell Atlantic-New Jersey, Inc. New Jersey Board of Public Utilities, Docket No. TO00060356. 2000. On behalf of WorldCom, Inc.

Delaware

Petition of Focal Communications Corporation of Pennsylvania For Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Bell Atlantic – Delaware, Inc. Delaware Public Service Commission, PSC Docket No. 00-025. Direct Testimony, May 2000. On behalf of Focal Communications Corporation of Pennsylvania.

Texas

Petition of The General Counsel for an Evidentiary Proceeding to Determine Market Dominance, PUC of Texas, Docket No. 7790, Direct Testimony, June 1988. On behalf of the Public Utility Commission of Texas.

Application of Southwestern Bell Telephone Company for Revisions to the Customer Specific Pricing Plan Tariff, PUC of Texas, Docket No. 8665, Direct Testimony, July 1989. On behalf of the Public Utility Commission of Texas.

Application of Southwestern Bell Telephone Company to Amend its Existing Customer Specific Pricing Plan Tariff: As it Relates to Local Exchange Access through Integrated Voice/Data Multiplexers, PUC of Texas, Docket No. 8478, Direct Testimony, August 1989. On behalf of the Public Utility Commission of Texas.

Application of Southwestern Bell Telephone Company to Provide Custom Service to Specific Customers, PUC of Texas, Docket No. 8672, Direct Testimony, September 1989. On behalf of the Public Utility Commission of Texas.

Inquiry of the General Counsel into the Reasonableness of the Rates and Services of Southwestern Bell Telephone Company, PUC of Texas, Docket No. 8585, Direct Testimony, November 1989. On behalf of the Public Utility Commission of Texas.

Southwestern Bell Telephone Company Application to Declare the Service Market for CO LAN Service to be Subject to Significant Competition, PUC of Texas, Docket No. 9301, Direct Testimony, June 1990. On behalf of the Public Utility Commission of Texas.

Petition of Southwestern Bell Telephone Company for Authority to Change Rates, PUC of Texas, Docket No. 10382, Direct Testimony, September 1991. On behalf of the Public Utility Commission of Texas.

Application of Southwestern Bell Telephone Company, GTE Southwest, Inc., and Contel of Texas, Inc. For Approval of Flat-rated Local Exchange Resale Tariffs Pursuant to PURA 1995 Section 3.2532, Public Utility Commission of Texas, Docket No. 14658, January 24, 1996. On behalf of Office of Public Utility Counsel of Texas.

Application of Southwestern Bell Telephone Company, GTE Southwest, Inc., and Contel of Texas, Inc. For Interim Number Portability Pursuant to Section 3.455 of the Public Utility Regulatory Act, Public Utility Commission of Texas, Docket No. 14658, March 22, 1996. On behalf of Office of Public Utility Counsel of Texas.

Application of AT&T Communications for Compulsory Arbitration to Establish an Interconnection Agreement Between AT&T and Southwestern Bell Telephone Company, and Petition of MCI for Arbitration under the FTA96, Public Utility Commission of Texas, Consl. Docket Nos. 16226 and 16285. September 15, 1997. On behalf of AT&T and MCI.

Proceeding to examine reciprocal compensation pursuant to section 252 of the Federal Telecommunications of 1996, Public Utility Commission of Texas, Docket No. 21982. May 2000. On behalf of Taylor Communications.

Iowa

US West Communications, Inc., Iowa Department of Commerce – Utilities Board, Docket No: RPU – 00 – 01. Direct Testimony, July 2000. On behalf of McLeodUSA.

Illinois

Adoption of Rules on Line-Side Interconnection and Reciprocal Interconnection, Illinois Commerce Commission, Docket No. 94-0048. September 30, 1994. On behalf of Teleport Communications Group, Inc.

Proposed Introduction of a Trial of Ameritech's Customer First Plan in Illinois, Illinois Commerce Commission, Docket No. 94-0096. September 30, 1994. On behalf of Teleport Communications Group, Inc.

Addendum to Proposed Introduction of a Trial of Ameritech's Customer First Plan in Illinois, Illinois Commerce Commission, Docket No. 94-0117. September 30, 1994. On behalf of Teleport Communications Group, Inc.

AT&T's Petition for an Investigation and Order Establishing Conditions Necessary to Permit Effective Exchange Competition to the Extent Feasible in Areas Served by Illinois Bell Telephone Company, Illinois Commerce Commission, Docket No. 94-0146. September 30, 1994. On behalf of Teleport Communications Group, Inc.

Proposed Reclassification of Bands B and C Business Usage and Business Operator Assistance/Credit Surcharges to Competitive Status, Illinois Commerce Commission, Docket No.

95-0315, May 19, 1995. On behalf of MCI Telecommunications Corporation.

Investigation Into Amending the Physical Collocation Requirements of 83 Ill. Adm. Code 790, Illinois Commerce Commission, Docket 94-480, July 13, 1995. On behalf of MCI Telecommunications Corporation.

Petition for a Total Local Exchange Wholesale Tariff from Illinois Bell Telephone Company d/b/a Ameritech Illinois and Central Telephone Company Pursuant to Section 13-505.5 of the Illinois Public Utilities Act, Illinois Commerce Commission, Docket No. 95-0458, December 1995. On behalf of MCI Telecommunications Corporation.

Citation to Investigate Illinois Bell Telephone Company's Rates, Rules and regulations For its Unbundled Network Component Elements, Local Transport Facilities, and End office Integration Services, Illinois Commerce Commission, Docket No. 95-0296, January 4, 1996. On behalf of MCI Telecommunications Corporation.

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Illinois Bell Telephone Company d/b/a Ameritech Illinois, Illinois Commerce Commission, Docket No. 96-AB-006, October, 1996. On behalf of MCI Telecommunications Corporation.

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Central Telephone Company of Illinois ("Sprint"), Illinois Commerce Commission, Docket No. 96-AB-007, January, 1997. On behalf of MCI Telecommunications Corporation.

Investigation into forward looking cost studies and rates of Ameritech Illinois for interconnection, network elements, transport and termination of traffic. Illinois Commerce Commission, Docket No. 96-0486, February, 1997. On behalf of MCI Telecommunications Corporation.

Phase II of Ameritech Illinois TELRIC proceeding. Illinois Commerce Commission Docket No. 98-0396, May 2000. On behalf of MCIWorldCom.

Illinois Commerce Commission On its Motion vs Illinois Bell Telephone Company Investigation into Tariff Providing Unbundled Local Switching with Shared Transport, Illinois Commerce Commission, Docket No. 00- 0700. October 2001. On behalf of AT&T Communications of Illinois, Inc. and WorldCom, Inc.

Massachusetts

NYNEX/MCI Arbitration, Common Wealth of Massachusetts, Department of Public Utilities,

D.P.U. 96-83, October 1996. On behalf of MCI Telecommunications Corporation.

Investigation into Pricing based on TELRIC for Unbundled Network Elements and Combinations of Unbundled Networks Elements and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services. Massachusetts Department of Energy and Transportation, Docket 01-20. On behalf Allegiance, Network Plus, Inc., El Paso Networks, LLC, and Covad Communications Company. July 2001.

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Regulatory Plan to succeed Price Cap Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' intrastate retail telecommunications services in the Commonwealth of Massachusetts. Massachusetts Department of Energy and Transportation, Docket 01-03. On behalf of Network Plus, Inc., August 2001.

New Mexico

Brooks Fiber Communications of New Mexico, Inc. Petition for Arbitration, New Mexico State Corporation Commission, Docket No. 96-307-TC, December, 1996. On behalf of Brooks Fiber Communications of New Mexico, Inc.

Michigan

In the Matter of the Application of City Signal, Inc. for an Order Establishing and Approving Interconnection Arrangements with Michigan Bell Telephone Company, Michigan Public Service Commission, Case No. U-10647, October 12, 1994. On behalf of Teleport Communications Group, Inc.

In the Matter, on the Commission's Own Motion, to Establish Permanent Interconnection Arrangements Between Basic Local Exchange Providers, Michigan Public Service Commission, Case No. U-10860, July 24, 1995. On behalf of MCI Telecommunications Corporation.

In the Matter, on the Commission's Own Motion, to consider the total service long run incremental costs and to determine the prices for unbundled network elements, interconnection services, resold services, and basic local exchange services for Ameritech Michigan, Michigan Public Service Commission, Case No. U-11280, March 31, 1997. On behalf of MCI Telecommunications Corporation.

In the matter of the application under Section 310(2) and 204, and the complaint under Section 205(2) and 203, of MCI Telecommunications Corporation against AMERITECH requesting a reduction in intrastate switched access charges, Case No. U-11366. April, 1997. On behalf of MCI Telecommunications Corporation.

Ohio

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Ameritech Ohio, The Public Utilities Commission of Ohio, Case No. 96-888-TP-ARB, October, 1996. On behalf of MCI Telecommunications Corporation.

In the matter of the review of Ameritech Ohio's economic costs for interconnection, unbundled network elements, and reciprocal compensation for transport and termination of local telecommunications traffic, The Public Utilities Commission of Ohio, Case No. 96-922-TP-UNC, Jan 17, 1997. On behalf of MCI Telecommunications Corporation.

In the Matter of the Review of Ameritech Ohio's Economic Costs for Interconnection, Unbundled Network Elements, and Reciprocal Compensation for Transport and Termination of Local Telecommunications Traffic. Case No. 96-922-TP-UNC and In the Matter of the Application of Ameritech Ohio for Approval of Carrier to Carrier *Tariff. Case No. 00-1368-TP-ATA.* Ohio Public Utilities Commission. Direct Testimony, October 2000. On behalf of MCIWorldCom and ATT of the Central Region.

Indiana

In the matter of the Petition of MCI Telecommunications Corporation for the Commission to Modify its Existing Certificate of Public Convenience and Necessity and to Authorize the Petitioner to Provide certain Centrex-like Intra-Exchange Services in the Indianapolis LATA Pursuant to I.C. 8-1-2-88, and to Decline the Exercise in Part of its Jurisdiction over Petitioner's Provision of such Service, Pursuant to I.C. 8-1-2.6., Indiana Regulatory Commission, Cause No. 39948, March 20, 1995. On behalf of MCI Telecommunications Corporation.

In the matter of the Petition of Indiana Bell Telephone company, Inc. For Authorization to Apply a Customer Specific Offering Tariff to Provide the Business Exchange Services Portion of Centrex and PBX Trunking Services and for the Commission to Decline to Exercise in Part Jurisdiction over the Petitioner's Provision of such Services, Pursuant to I.C. 8-1-2.6, Indiana regulatory Commission, Cause No. 40178, October 1995. On behalf of MCI Telecommunications Corporation.

MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Indiana Bell Telephone Company d/b/a Ameritech Indiana, Indiana Public Utility Regulatory Commission, Cause No. 40603-INT-01, October 1996. On behalf of MCI Telecommunications Corporation.

In the matter of the Commission Investigation and Generic Proceeding on Ameritech Indiana's Rates for Interconnection Service, Unbundled Elements and Transport and Termination under the Telecommunications Act of 1996 and Related Indiana Statutes, Indiana Public Utility Regulatory Commission, Cause No. 40611. April 18, 1997. On behalf of MCI Telecommunications Corporation.

In the Matter of the Commission Investigation and Generic Proceeding on GTE's Rates for Interconnection, Service, Unbundled Elements, and Transport under the FTA 96 and related Indiana Statutes, Indiana Public Utility Regulatory Commission, Cause No. 40618. October 10, 1997. On behalf of MCI Telecommunication Corporation.

In the matter of the Commission Investigation and Generic proceeding on the Ameritech Indiana's rates for Interconnection, Unbundled Elements, and Transport and Termination Under the Telecommunications Act of 1996 and Related Indiana Statutes, Indiana Utility Regulatory Commission, Cause No. 40611-S1. October 2001. On behalf of WorldCom, Inc., AT&T Communications of Indiana, G.P.

Rhode Island

Comprehensive Review of Intrastate Telecommunications Competition, State of Rhode Island and Providence Plantations Public Utilities Commission, Docket No. 2252, November, 1995. On behalf of MCI Telecommunications Corporation.

Vermont

Investigation into NET's tariff filing re: Open Network Architecture, including the Unbundling of NET's Network, Expanded Interconnection, and Intelligent Networks, Vermont Public Service Board, Docket No. 5713, June 8, 1995. On behalf of MCI Telecommunications Corporation.

Wisconsin

Investigation of the Appropriate Standards to Promote Effective Competition in the Local Exchange Telecommunications Market in Wisconsin, Public Service Commission of Wisconsin, Cause No. 05-TI-138, November, 1995. On behalf of MCI Telecommunications Corporation.

Matters relating to the satisfaction of conditions for offering interLATA services (Wisconsin Bell, Inc. d/b/a Ameritech Wisconsin) Wisconsin Public Service Commission, 670-TI-120, March 25, 1997. On behalf of MCI Telecommunications Corporation.

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Wisconsin Bell, Inc. d/b/a Ameritech Wisconsin, Wisconsin Public Service Commission, Docket Nos. 6720-MA-104 and 3258-MA-101. On behalf of MCI Telecommunications Corporation.

Investigation Into The Establishment of Cost-Related Zones For Unbundled Network Elements, Docket No. 05-TI-349. Rebuttal Testimony, September 2000. On behalf of AT&T Communications of Wisconsin, McLEODUSA Telecommunications Services, Inc., TDS MetroCom, Inc., and Time Warner Telecom.

Pennsylvania

In Re: Formal Investigation to Examine Updated Universal Service Principles and Policies for telecommunications Services in the Commonwealth Interlocutory order, Initiation of Oral Hearing Phase, Pennsylvania Public Utility Commission, Docket No. I-00940035, February 28, 1996. On behalf of MCI Telecommunications Corporation.

Structural Separation of Verizon, Pennsylvania Public Utility Commission - Docket No. M-0001352. Direct Testimony, October, 2000. On behalf of MCI WorldCom.

Georgia

AT&T Petition for the Commission to Establish Resale Rules, Rates and terms and Conditions and the Initial Unbundling of Services, Georgia Public Service Commission, Docket No. 6352-U, March 22, 1996.On behalf of MCI Telecommunications Corporation.

Tennessee

Avoidable Costs of Providing Bundled Services for Resale by Local Exchange Telephone Companies, Tennessee Public Service Commission, Docket No. 96-00067, May 31, 1996. On behalf of MCI Telecommunications Corporation.

Commonwealth of Puerto Rico

Petition for Arbitration Pursuant to 47 U.S.C. & (b) and the Puerto Rico Telecommunications Act of 1996, regarding Interconnection Rates Terms and Conditions with Puerto Rico Telephone Company, Puerto Rico Telecommunications Regulatory Board, Docket No. 97-0034-AR, April 15, 1997. On behalf of Cellular Communications of Puerto Rico, Inc.