

Attachment 1

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

In the Matter of)	
)	EB Docket No. 03-197
Section 272(d) Biennial Audit of)	
BellSouth Telecommunications, Inc.)	

**DECLARATION OF ROBERT M. BELL
ON BEHALF OF AT&T CORP.**

1. My name is Robert M. Bell. My business address is AT&T Labs-Research, 180 Park Avenue, Florham Park, New Jersey 07932.

2. I received a Ph.D. in Statistics from Stanford University in 1980. From 1980 to 1998, I was promoted to Senior Statistician at RAND, a non-profit institution that conducts public policy analysis. While at RAND, I supervised the statistical design and/or analysis of many projects, including several large multi-site evaluations. I also headed the RAND Statistics Group from 1993 to 1995 and taught statistics in the RAND Graduate School from 1992 to 1998. In 1998, I joined the Statistics Research Department at AT&T Labs-Research, where I am a Principal Member of Technical Staff. My main research area is survey research methods. I have authored or co-authored fifty articles on statistical analysis that have appeared in a variety of refereed, professional journals. I am a fellow of the American Statistical Association. I am currently a member of the Committee on National Statistics organized by the National Academy of Sciences as well as the Academy's Panel to Review the 2000 Census. I have attached a copy of my curriculum vitae as Exhibit RMB-1.

3. I submitted Declarations in the first Verizon Section 272 Audit proceeding, CC Docket No. 96-150, on April 8, 2002; the first SBC Audit proceeding, CC Docket No. 96-150, on January 29, 2002; and the second Verizon Section 272 Audit proceeding, CC Docket No. 03-200, on February 10, 2004.

4. The purpose of this declaration is to address the data on performance measurements in Attachment A to the Report of PricewaterhouseCoopers LLP filed on December 23, 2003 in connection with the biennial section 272 audit of the BellSouth companies (“Auditor’s Report”) as well as various sampling issues.

I. THE PERFORMANCE MEASUREMENT DATA SHOWS THAT BELL SOUTH HAS DISCRIMINATED IN FAVOR OF ITS SECTION 272 AFFILIATE.

5. The data reported in Attachment A to the Auditor’s Report show patterns of consistent and statistically significant discrimination against non-affiliates compared with the BellSouth 272 affiliate. The most severe problems occurred with Trouble Report Rates for DS1. Other performance measures also showed consistent and statistically significant discrimination in multiple states, most notably in Florida and Georgia.

6. Pages 45-47 of Appendix A identifies numerous instances where non-affiliates received statistically worse performance for a measure than did the affiliate comparison group (based on entries of “NO” in the Equity columns of tables in Attachment A) for one or more months. However, the report misses many other instances of consistently worse performance because it only addresses within-month comparisons for measures with at least 30 transactions for both affiliates and non-affiliates. For all the measures except Trouble Report Rate, affiliate volumes are often or almost always less than 30 for single months, so that few or

no test statistics (Z scores) are even computed, and those that are computed have limited power to detect discrimination.

7. To make the fullest use of the available evidence, I looked across the 12 months of reported data. My analysis involved two steps to determine whether inferior performance was both consistent and substantial over the 12 months. First, I counted the number of months (out of those with affiliate volume) where the non-affiliates received poorer performance. Second, I computed a Z score based on data aggregated across the 12 months.¹ In all cases, Z scores less than -2.00 indicate statistically significant poorer performance for non-affiliates (with a Type I error of less than 0.025).

8. **Trouble Report Rate.** Non-affiliates consistently faced much higher Trouble Report Rates for DS1 in all nine states. In seven of nine states, the non-affiliate rate was higher in *every* month, and Table 17 of the audit report indicates that many of those monthly differences were statistically significant. When aggregated across 12 months, all nine states' comparisons were easily significant, with Z scores ranging from -3.49 to -14.25. The ratios of non-affiliate rates to affiliate rates were 2.8 or higher in five states: 5.8 (2.11% versus 0.36%) in Florida, 5.0 (3.15% versus 0.63%) in Mississippi, 3.4 (2.35% versus 0.69%) in Kentucky, 2.9 (2.63% versus 0.91%) in South Carolina, and 2.8 (2.75% versus 0.97) in Alabama. Pages 46-47 of Appendix A reports BellSouth management's response to the results for Trouble Report Rate. Nothing in that response addresses, much less contradicts, the finding that there is consistent, statistically significant disparity for this measure.

¹ For mean measures, I computed a two-sample modified Z test, using the non-affiliates variance pooled across the twelve months. For proportion measures, I computed a Z score equal to the signed square root of Pearson's chi-square statistic.

9. **Average Installation Interval.** For Installation Intervals for DS1 service, non-affiliates in two states faced statistically significant longer intervals. In Georgia, all three interval types (requested, offered, and installed) were longer for non-affiliates than for the 272 affiliate in 10 or 11 out of 12 months, and all three aggregate comparisons were highly significant (Z scores of -5.04 or less). Average Installation Intervals differed by more than two days (10.75 days versus 8.57 days). In Louisiana, all three interval types were longer for non-affiliates than for the 272 affiliate in 9 out of 12 months, and all three aggregate comparisons were highly significant (Z scores of -4.68 or less). Average Installation Intervals in Louisiana differed by more than three days (11.82 days versus 8.53 days).

10. **Percentage of Installations Appointments Met.** Although BellSouth management argues that differences in installation intervals should be ignored, its preferred measure, Percentage of Installations Appointments Met, exhibits statistically significant disparities for DS1 in four states. In Alabama and Kentucky, there were no installation appointments missed for the 272 affiliate during the 12 months, in contrast with 2.86% ($Z = -2.34$) and 4.80% ($Z = -2.20$), respectively, for non-affiliates. In Florida and Georgia, the aggregate percentages of missed appointments were at least 6.0 times higher for non-affiliates ($Z = -2.19$ and $Z = -2.06$, respectively).

11. **Firm Order Confirmation Timeliness.** Non-affiliates consistently received much slower Firm Order Confirmation (FOC) for DS3 in Florida and Georgia. In each of those states, average FOC intervals for non-affiliates exceeded those for the 272 affiliate during 11 of 12 months. In Florida, the average interval was 2.72 days for non-affiliates versus 1.60 days for the Section 272 affiliate ($Z = -2.30$). In Georgia, the averages were 2.74 days for non-affiliates versus only 1.02 days for the affiliate ($Z = -2.58$).

12. On page 45, BellSouth offered three explanations for the disparities in average FOC intervals—two data problems and a BellSouth representative’s error. BellSouth does not, however, explain why or how much each error contributed to observed disparity. Consequently, there is no evidence to suggest that the FOC disparities in Florida and Georgia are not mostly or completely due to other systematic problems.

13. **Average Repair Interval.** Average Repair Intervals for DS1 service for non-affiliates in Tennessee exceed those for the 272 affiliate in 12 out of 12 months. Aggregated across the 12 months, the average interval for non-affiliates was 3.11 hours compared with 2.05 hours for the 272 affiliate ($Z = -3.06$).

II. SAMPLING ISSUES.

14. *Objective V/VI, Procedure 3, Appendix A, page 14:* The adequacy of the sample of employees interviewed in this procedure is questionable. The auditors selected a judgmental sample of 8 out of 39 employees identified as responsible for developing and recording affiliate transactions to see if they were familiar with affiliate transaction rules. After eliminating two employees who had apparently been included incorrectly (the Part 64 employee and a “coordinator” who “provided sales volume data to support one entity’s consistent achievement of the FCC market rate test”), the sample included only six employees. As with any results based on a judgmental sample, the validity of the findings depends on how wisely the sample was selected. Unfortunately, necessary details about the sample selection process are missing from the report. The *General Standard Procedures for Biennial Audits Required Under Section 272 of the Communications Act of 1934, As Amended* appended to the Auditor’s Report (“*General Standard Procedures*”) at 32 required the auditor to “[i]nterview employees responsible for the development and recording of affiliate transactions costs” Although the

job titles of the selected employees are listed in the report, there is no indication of what job titles, if any, were not represented. Nor is there information to allow assessment of how well these employees compare with others in terms of time in their current positions and other factors that could affect their knowledge on this subject. Consequently, the selected employees might poorly represent the full list.

15. *Objective V/VI, Procedure 7, Appendix A, page 22-24:* The testing of international charges is based on inadequate data that systematically excludes an unspecified, but apparently critical, set of countries. For this procedure, the auditor drew a random sample of 118 invoices, 16 of which included international charges to 30 different countries. The problem is that BSLD could provide call details during this period for calls made to only 20 of the 30 countries. Furthermore, those 20 countries contributed to only three of the 16 invoices. Besides the problem that three invoices is a very small sample to use for drawing conclusions, the available data clearly excludes the countries called most frequently. Consequently, the report provides no evidence at all about whether international rates are charged in accordance with the Service Agreement for the countries that matter the most.

16. *Objective VII, Procedure 3, Appendix A, page 27-29:* To assess whether non-affiliates were charged the same rates as BSLD for goods, service, facilities, and information, the auditor selected a sample of 100 billing items (59 from CABS and 41 from CRIS). For each list, the auditor “judgmentally selected one non-affiliate for each sampled BSLD billed item.” The *General Standard Procedures* at 38 required the auditor to “[s]elect a statistically valid sample of such purchases.” Judgmental selection, as opposed to random selection of one non-affiliate, could easily have introduced bias to the results for this procedure. Unfortunately, the report fails to indicate why a judgmental sample was deemed necessary or to

discuss how judgment was used in selecting the non-affiliates. Without that information, the results are suspect.

Robert Bell
Robert M. Bell

Dated: this 5TH day of March, 2004

Exhibit RMB-1

ROBERT M. BELL

EDUCATION

Ph.D., Statistics, 1980, Stanford University
M.S., Statistics, 1973, University of Chicago
B.S., Mathematics, 1972, Harvey Mudd College

PROFESSIONAL EXPERIENCE

1998-Present – Principal Member Technical Staff, Statistics Research Department, AT&T Labs - Research, Florham Park, NJ; 2003 AT&T Science and Technology Medal
1991-1999 -- Senior Statistician, RAND, Santa Monica, California; Head, RAND Statistics Group (1993-1995); Member, RAND Graduate School Faculty (1991-1998)
1988-1991 -- Statistician, Social Policy Department, RAND, Santa Monica, California
1980-1988 -- Associate Statistician, Economics and Statistics Department, RAND, Santa Monica, California
1975-1979 -- Teaching Assistant/Research Assistant, Department of Statistics, Stanford University
1973-1975 -- Consultant and Mathematical Assistant, Economics Department, The RAND Corporation, (also intermittently during educational leave)

RESEARCH AREAS

Experimental Design and Survey Development. Dr. Bell supervised statistical design of Project Alert, an experiment of drug abuse prevention in thirty California and Oregon junior high schools. This work has involved data collection and analysis for sample selection/assignment, development of a series of 30 page questionnaires, and design of sampling procedures for several secondary analyses.

Data Analysis. Dr. Bell supervised the main data analysis in Project ALERT. He previously supervised analysis of clinical data from the National Preventive Dentistry Demonstration Program, a study of school-based preventive treatments. Data from that study included one to five annual examinations of 30,000 children in 10 communities, over 10,000 replicate examinations, and 20,000 surveys.

Statistical Methodology. Dr. Bell's methodological interests include survey research methods, analysis of data from complex samples, record linkage methods, analysis of missing data, measurement and scaling, robust procedures, empirical Bayes estimation, and sample reuse methods.

PROFESSIONAL ORGANIZATIONS/HONORS

- Member, Committee on National Statistics, National Academy of Sciences, 2001-present.
- Chair, Committee to Review the 2000 Decade Design of the Scientists and Engineers Statistical Data System (SESTAT), National Academy of Sciences, 2002.
- Member, Panel to Review the 2000 Census, National Academy of Sciences, 1998-present.
- Fellow, American Statistical Association, 1998.
- Chair, American Statistical Association Subcommittee, Census Advisory Committee of Professional Associations, 1997-1998; Member, 1995-2000.
- Member, Panel on Alternative Census Methodologies, National Academy of Sciences, 1995-1999.
- Member, Committee on Minorities in Statistics, American Statistical Association, 1995-2000.
- Member, Panel to Evaluate Alternative Census Methods, National Academy of Sciences, 1992-1994.
- Visiting Lecturer for American Statistical Association, 1984-1986.
- Program Chairman, Applied Statistics Workshop, Southern California Section of American Statistical Association, 1984.
- Institute of Mathematical Statistics, since 1979.
- American Statistical Association, since 1974.

PUBLICATIONS

Published Articles

- “Bias Reduction in Standard Errors for Linear Regression with Multi-Stage Samples,” *Survey Methodology*, Vol. 28, 2002, 169-181 (Bell and McCaffrey).
- “School-Based Drug Prevention: Challenges in Designing and Analyzing Social Experiments,” in *Public Policy and Statistics: Case Studies from RAND*, eds. S.C. Morton and J.E. Rolph, Springer-Verlag, New York, 2000.
- “Appropriateness of the Decision to Transfer Nursing Facility Residents to the Hospital,” *Journal of the American Geriatric Society*, Vol. 48, 2000, 154-163 (Saliba, Kington, Buchanan, Bell, et al.).
- “A Clinically Detailed Risk Information System for Cost,” *Health Care Financing Review*, Vol. 21, 2000, 1-27 (Carter, Bell Dubois, Goldberg, Keeler, McAlearney, Post, and Rumpel).
- “Cross-Lagged Relationships among Adolescent Problem Drug Use, Delinquent Behavior, and Emotional Distress,” *Journal of Drug Issues*, Vol., 30, 2000, 283-304 (Bui, Ellickson, and Bell).

“Adolescent Use of Illicit Drugs Other Than Marijuana: How Important is Social Bonding ant for Which Ethnic Groups?” *Substance Use and Misuse*, Vol. 34, 1999, 317-346 (Ellickson, Collins, and Bell).

“Simultaneous Polydrug Use among Teens: Prevalence and Predictors,” *Journal of Substance Use*, Vol. 10, 1999, 233-253 (Collins, Ellickson, and Bell).

“Physician Response to Prenatal Substance Exposure,” *Maternal and Child Health Journal*, 1999, 29-38 (Zellman, Bell, Archie, DuPlessis, Hoube, and Miu).

“Underuse and Overuse of Diagnostic Testing for Coronary Artery Disease in Patients Presenting with New-Onset Chest Pain,” *American Journal of Medicine*, 1999, 391-398, (Carlisle, Leape, Bickel, Bell, et al.).

“Underuse of Cardiac Procedures: Do Women, Ethnic Minorities, and the Uninsured Fail to Receive Needed Revascularization?,” *Annals of Internal Medicine*, Vol. 130, 1999, 183-192 (Leape, Hilborne, Bell, Kamberg, and Brook).

“The Sexual Practices of Asian and Pacific Islander High School Students,” *Journal of Adolescent Health*, Vol. 23, 1998, 221-231 (Schuster, Bell, Nakajima, and Kanouse).

“Does Early Drug Use Increase the Risk of Dropping out of High School?,” *Journal of Drug Issues*, Vol. 28, 1998, 357-380 (Ellickson, Bui, Bell, and McGuigan).

“Impact of a High School Condom Availability Program on Sexual Attitudes and Behaviors,” *Family Planning Perspectives*, Vol. 30, 1998, 67-72 & 88 (Schuster, Bell, Berry, and Kanouse).

“Analytic Versus Holistic Scoring of Science Performance Tasks,” *Applied Measurement in Education*, Vol. 11, 1998, 121-137 (Klein, Stecher, Shavelson, McCaffrey, Ormseth, Bell, Comfort, and Othman).

“Influencing Physician Response to Prenatal Substance Exposure Through State Legislation and Work-Place Policies,” *Addiction*, Vol. 92, 1997, 1123-1131 (Zellman, Jacobson, and Bell).

“Adjusting Cesarean Delivery Rates for Case Mix,” *Health Services Research*, Vol. 32, 1997, 509-526. (Keeler, Park, Bell, Gifford, and Keesey).

“Students’ Acquisition and Use of School Condoms in a High School Condom Availability Program,” *Pediatrics*, Vol. 100, October 1997, 689-694 (Schuster, Bell, Berry, and Kanouse).

“Impact Of Response Options And Feedback About Response Inconsistencies On Alcohol Use Self-Reports By Microcomputer,” *Journal of Alcohol and Drug Education*, Vol. 42, 1997, 1-18 (Hays, Bell, Gillogly, Hill, Giroux, Davis, Lewis, Damush, and Nicholas).

“Adjusting for Attrition in School-Based Samples: Bias, Precision, and Cost Trade-Offs of Three Methods,” *Evaluation Review*, Vol. 21, October 1997, 554-567 (McGuigan, Ellickson, Hays, and Bell).

“Teenagers and Alcohol Misuse in the United States: By any Definition, it’s a Big Problem,” *Addiction*, Vol. 91, 1996, 1489-1506 (Ellickson, McGuigan, Adams, Bell, and Hays).

“Communication Between Adolescents and Physicians About Sexual Behavior and Risk Prevention,” *Archives of Pediatrics and Adolescent Medicine*, Vol. 150, 1996, 906-913 (Schuster, Bell, Petersen, and Kanouse).

“The Sexual Practices of Adolescent Virgins: Genital Sexual Activities of High School Students Who Have Never Had Vaginal Intercourse,” *American Journal of Public Health*, Vol. 86, 1996, 1570-1576 (Schuster, Bell, and Kanouse).

“How Will the NCAA’s New Standards Affect Minority Student-Athletes?,” *Chance*, Vol. 8, 18-21, Summer 1995 (Klein and Bell).

“Discussion of Census 2000: Statistical Issues in Reengineering the Decennial Census,” *Proceedings of the Social Statistics Section, American Statistical Association*, 1995, 17-18 (Bell).

“Effects of Reporting Methods on Infant Mortality Rate Estimates for Racial and Ethnic Subgroups,” *Journal of Health Care for the Poor and Underserved*, Vol. 6, 1995, 60-75 (Farley, Richards, and Bell).

“Do Response Options Influence Self-Reports of Alcohol Use?,” *The International Journal of the Addictions*, Vol. 29, 1994, 1909-1920 (Hays, Bell, Damush, Hill, DiMatteo, and Marshall).

“The Utility of Multiple Raters and Tasks in Science Performance Assessments,” *Educational Assessment*, Vol. 2, 1994, 257-272 (Saner, Klein, Bell, and Comfort).

“Sampling and Statistical Estimation in the Decennial Census,” *Proceedings of the Section on Survey Research Methods, American Statistical Association*, 1994, 71-79 (Bell).

“The Impact of Response Options and Location in a Microcomputer Interview on Drinking Drivers' Alcohol Use Self-Reports,” *Alcohol and Alcoholism*, Vol. 29, 1994, 203-209 (Hays, Bell, Hill, Gillogly, Lewis, Marshall, Nicholas, and Marlatt).

“The Urge to Merge: Linking Vital Statistics Records and Medicaid Claims,” *Medical Care*, Vol. 32, 1994, 1004-1018, reprinted by invitation in *Yearbook of Medical Informatics*, 1995, 366-380 (Bell, Keeseey, and Richards).

“The 1966 Enactment of Medicare: Its Effect on Discharges from Los Angeles County-Operated Hospitals,” *American Journal of Public Health*, Vol. 84, 1994, 1325-1327 (Glassman, Bell, and Tranquada).

“The Urge to Merge: A Computational Method for Linking Datasets with No Unique Identifier,” *Proceedings of the 18th Annual SAS Users' Group International Conference, 1993* (Bell, Keeseey, and Richards).

“Using Response Agreement to Evaluate Suspect Links on a Longitudinal Survey,” *Proceedings of Section on Survey Research Methods, American Statistical Association*, 1993, 286-291 (Bell).

“Changing Adolescent Propensities to Use Drugs: Results from Project ALERT,” *Health Education Quarterly*, Vol. 20, 1993, 227-242 (Ellickson, Bell, and Harrison).

“Response Times for the CAGE, Short-MAST, AUDIT, and JELLINEK Alcohol Scales,” *Behavior Research Methods, Instruments, & Computers*, Vol. 25, 1993, 304-307 (Hays, Hill, Gillogly, Lewis, Bell, and Nicholas).

“Do Drug Prevention Effects Persist into High School? How Project ALERT Did with Ninth Graders,” *Preventive Medicine*, Vol. 22, 1993, 463-483 (Bell, Ellickson, and Harrison).

“Preventing Adolescent Drug Use: Long Term Results of a Junior High Program,” *American Journal of Public Health*, Vol. 83, 1993, 856-861 (Ellickson, Bell, and McGuigan).

“Stepping Through the Drug Use Sequence: Longitudinal Scalogram Analysis of Initiation and Regular Use,” *Journal of Abnormal Psychology*, Vol. 101, 1992, 441-451 (Ellickson, Hays, and Bell).

“New DEALEs: Other Approximations of Life Expectancy,” *Medical Decision Making*, Vol. 12, 1992, 307-311 (Keeler and Bell).

“A Microcomputer Assessment System (MAS) for Administering Computer-Based Surveys: Preliminary Results from Administration to Clients at an Impaired-Driver Treatment Program,” *Behavior Research Methods, Instruments, & Computers*, Vol. 24, 1992, 358-365 (Hays, Gillogly, Hill, Lewis, Bell, and Nicholas).

“Challenges to Social Experiments: A Drug Prevention Example,” *J. Res. in Crime and Delinquency*, Vol. 29, 1992, 79-101 (Ellickson and Bell).

“Preventing Drug Use among Young Adolescents,” *The Education Digest*, Vol. 56, 1990, 63-67 (Ellickson and Bell).

“Assessing Cost Effects of Nursing-Home-based Geriatric Nurse Practitioners,” *Health Care Financing Review*, Vol. 11, No. 3, 1990, 67-78 (Buchanan, Bell, Arnold, Witsberger, Kane, and Garrard).

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“Affirmative Action in Medical Education and its Effect on Howard and Meharry: A Study of the Class of 1975,” *Journal of the National Medical Association*, Vol. 80, 1988, 153-158 (Klein, Bell, and Williams).

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“Value Preferences for Nursing Home Outcomes,” *The Gerontologist*, Vol. 26, 1986, 303-308 (Kane, Bell, and Riegler).

“Conjecture Versus Empirical Data: A Response to Concerns Raised about the National Preventive Dentistry Demonstration Program (Different Views),” *Am J. Public Health*, Vol. 76, 1986, 448-452 (Klein, Bohannan, Bell, Disney, and Graves).

“Effects of Affirmative Action in Medical Schools, a Study of the Class of 1975,” *New England Journal of Medicine*, Vol. 313 (Special Article), 1985, 519-525 (Keith, Bell, Swanson, and Williams).

“The Cost and Effectiveness of School-Based Preventive Dental Care,” *American Journal of Public Health*, Vol. 75, 1985, 382-391 (Klein, Bohannan, Bell, Disney, Foch, and Graves).

“Management and Evaluation of the Effects of Misclassification in a Controlled Clinical Trial,” *Journal of Dental Research*, Vol. 63 (Special Issue), 1984, 731-734 (Bell and Klein).

“Predicting the Course of Nursing Home Patients: A Progress Report,” *The Gerontologist*, Vol. 23, 1983, 200-206 (Kane, Bell, Riegler, Wilson, and Keeler).

“Assessing the Outcomes of Nursing-Home Patients,” *Journal of Gerontology*, Vol. 38, 1983, 385-393 (Kane, Bell, Riegler, Wilson, and Kane).

“An Adaptive Choice of the Scale Parameter for M-Estimators of Location,” Ph.D. thesis, Stanford University, 1980 (Bell).

“Competitive Optimality of Logarithmic Investment,” *Mathematics of Operations Research*, Vol. 5, 1980, 161-166 (Bell and Cover).

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Preparing for the 2000 Census: Interim Report II, Panel to Evaluate Alternative Census Methodologies, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1997.

Sampling in the 2000 Census: Interim Report I, Panel to Evaluate Alternative Census Methodologies, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1996.

Counting People in the Information Age, Final Report, Panel to Evaluate Alternative Census Methods, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C., 1994.

A Census that Mirrors America, Interim Report, Panel to Evaluate Alternative Census Methods, Committee on National Statistics, Division on Behavioral and Social Sciences and Education. National Academy Press, Washington, D.C. 1993.

RAND Publications

The Sexual Practices of Asian and Pacific Islander High School Students, RP-744, RAND, 1998 (Schuster, Bell, Nakajima, and Kanouse).

Analysis of Data from Complex Surveys (videorecording), Statistics Short Course Series, V-092, RAND, 1997 (McCaffrey and Bell).

Graphical Methods for Data Analysis, (videorecording), Statistics Short Course Series, V-022 through V-025, RAND 1996 (Bell and McCaffrey).

Defining Infants' Race and Ethnicity in a Study of Very Low Birthweight Infants, MR-191-AHCPR, RAND, 1993 (Farley, Richards, and Bell).

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Multiplying Inequalities, The Effects of Race, Social Class, and Tracking on Opportunities to Learn Mathematics and Science, R-3928-NSF, RAND, July 1990 (Oakes, Ormseth, Bell, and Camp).

Baseline Nonresponse in Project ALERT: Does it Matter?, N-2933-CHF, The RAND Corporation, Santa Monica, California, April 1990 (Bell, Gareleck, and Ellickson).

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The Role of Professional Background, Case Characteristics, and Protective Agency Response in Mandated Child Abuse Reporting, R-3825-HHS, The RAND Corporation, Santa Monica, California, January 1990 (Zellman and Bell).

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Treatment Effects in the National Preventive Dentistry Demonstration Program, R-3072-RWJ, The RAND Corporation, Santa Monica, California, February 1984 (Bell, Klein, Bohannon, Disney, Graves, and Madison).

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Predicting the Course of Nursing Home Patients: A Progress Report, N-1786-NCHSR, The RAND Corporation, Santa Monica, California, January 1982 (Kane, Riegler, Bell, Potter, and Koshland).

Results of Baseline Dental Examinations in the National Preventive Dentistry Demonstration Program, R-2862-RWJ, The RAND Corporation, Santa Monica, California, April 1982 (Bell, Klein, Bohannon, Graves, and Disney).

CETA: Is it Equitable to Women?, N-1683-DOL, The RAND Corporation, Santa Monica, California, May 1981 (Berryman, Chow, and Bell).

Plan for the Analysis of Dental Examination Data in the National Preventive Dentistry Demonstration Program, N-1658-RWJ, The RAND Corporation, Santa Monica, California, April 1981 (Klein and Bell).

Medical School and Physician Performance: Predicting Scores on the American Board of Internal Medicine Written Examination, R-1723-HEW, The RAND Corporation, Santa Monica, CA, August 1977 (Bell).

R. M. Bell/10

February 2004