IN THE MATTER OF THE GENERIC INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS

Arizona Corporation Commission Staff ("Staff") hereby files the Direct Testimony of William Dunkel, in the above-referenced matter.

RESPECTFULLY SUBMITTED this 28th day of April 2003.

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Arizona Corporation Commission
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IN THE MATTER OF THE GENERIC INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.'S NKA QWEST CORPORATION, COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS

DIRECT TESTIMONY AND SCHEDULES

OF

WILLIAM DUNKEL

ON BEHALF OF

THE STAFF OF THE ARIZONA CORPORATION COMMISSION

APRIL 28, 2003
I. STATEMENT OF QUALIFICATIONS AND INTRODUCTION

Q. PLEASE STATE YOUR NAME AND YOUR BUSINESS ADDRESS.
A. My name is William Dunkel. My business address is 8625 Farmington Cemetery Road, Pleasant Plains, Illinois 62677.

Q. WHAT IS YOUR PRESENT OCCUPATION?
A. I am a consultant providing services in telephone rate proceedings. I am the principal of William Dunkel and Associates, which was established in 1980. Since that time, I have regularly provided consulting services in telephone regulatory proceedings throughout the country. I have participated in over 140 state regulatory proceedings before over one-half of the state commissions in the United States, as shown on Appendix A attached hereto. I have participated in telephone regulatory proceedings for over 20 years.

I currently provide, or in the past have provided, services in telecommunications proceedings to the following clients:

The Public Utility Commission or the Staffs in the States of:

- Arkansas
- Arizona
- Delaware
- Georgia
- Guam
- Illinois
- Maryland
- Mississippi
- Missouri
- New Mexico
- U.S. Virgin Islands
- Utah
- Virginia
- Washington
- Kansas

The Office of the Public Advocate, or its equivalent, in the States of:
Colorado     Missouri
District of Columbia     New Jersey
Georgia     New Mexico
Hawaii     Ohio
Hawaii     Oklahoma
Illinois     Pennsylvania
Indiana     Utah
Iowa     Washington
Maine
Florida

The Department of Administration in the States of:

Illinois     South Dakota
Minnesota     Wisconsin

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?
A. I am testifying on behalf of the Staff of the Arizona Corporation Commission (ACC).

Q. HAVE YOU PREVIOUSLY PARTICIPATED IN ANY PROCEEDINGS IN ARIZONA?
A. Yes. Most recently, I filed testimony on behalf of the ACC Staff in Phase IIa of this proceeding, Docket No. T-00000A-00-0194. In addition, I filed testimony on behalf of the ACC Staff in Phase II of this proceeding. I also filed testimony on behalf of the ACC Staff in the general rate case, Docket No. T-01051B-99-0105. I also filed rebuttal testimony in Docket No. T-01051B-97-0689 on behalf of the ACC Staff regarding depreciation. In addition, I conducted a Cost of Service Study on behalf of the Staff of the Arizona Corporation Commission in an undocketed matter preparing a cost study pertaining to Qwest Corporation (formerly US West Communications (USWC)). I was a rate design witness in general rate case, Docket No. E-1051-93-183, involving USWC on behalf of the ACC Staff.
Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?
A. The purpose of this testimony is to address the issues set forth in the Commission's April 11, 2003 Procedural Order in this proceeding.

Q. WHAT IS THE FIRST ISSUE PRESENTED IN THE PROCEDURAL ORDER?
A. The first issue is:

Should Staff's Opinion 1 (the transport rates prior to this Cost Docket) or Staff's Option 2 (the transport rates adopted in Decision No. 64922 minus the entrance facility charges where no entrance facility is provided) be adopted as the rates for DS1 and DS3 transport effective until the reconsideration of these rates in Phase III of the Cost Docket?

Q. WHAT IS YOUR POSITION ON ISSUE 1?
A. Since I was involved in authoring both of these options, I believe either one of them would be a reasonable interim solution. Of the two, I prefer Staff Option 1, which is to return to the transport rates that were in effect prior to Phase II. Those prior rates had previously been approved by the Commission. However, since I also presented Option 2 as an acceptable interim solution, I do not have a strong objection to Option 2 being the interim solution.

Q. WHAT IS THE SECOND ISSUE SET FORTH IN THE ORDER?
A. The second issue is:

Are the revised rates that are determined as a result of the expedited hearing effective as of June 12, 2002 or from the effective date of the Order adopting the revised rates?
Q. WHAT IS YOUR POSITION ON ISSUE 2?

A. The issue of retroactive rates is a legal issue, which I will not address.

However, as a result a recent discovery, we have determined that the application and costs of the transport rates are different than what was incorporated into the Phase II rates.

Prior to Phase II, Qwest charged a separate “entrance facility” rate and separate “transport” charges. In Phase II, these two rates were replaced with one “transport” charge. The cost studies and the rates assumed there was one entrance facility for each transport rate. Therefore, the transport rates that were approved effectively included the cost of one entrance facility.

In the cost studies and rates that were accepted in that proceeding, the cost and rates for "entrance facilities" were zero, because those costs, and the rates to recover those costs, were included in the new "transport" charges.

The impacts of the new rates should have been fairly minor. For example, a 15 mile DS1 circuit plus entrance facility had “before” rates that totaled $139.51 ($89.42 for the entrance facility plus a $35.99 fixed transport charge, plus $0.94 per mile for transport). After Phase II, the transport rate was $148.97. This would have been an increase of about 7 percent.
However when the Phase II rates went into effect, Mountain Telecommunications, Inc. (MTI) provided information that the actual effects of these rates were huge percentage increases, much greater than 7 percent. The staff conducted discovery of MTI and Qwest to determine why the actual impact of the price change was much greater than the impact that was expected. Both the Qwest and MTI responses show that many of those circuits are arranged in ways that do not include an entrance facility.¹

I have reviewed those responses and determined that MTI’s transport lines are provided in such a way that they were not previously paying entrance facilities charges. The rate impact on such lines was large. In the 15 mile DS1 example previously discussed, the rate would go from $50.09 ($35.99 fixed transport charge, plus $0.94 per mile for transport) to $148.97, a 200% increase.

By paying the current transport charges, MTI is effectively paying for entrance facilities that they are not using. This is an overcharge to MTI and to similar companies.

Q. WHAT IS THE THIRD ISSUE IN THE ORDER?

A. The third issue is:

What is the appropriate analog port rate using the HAI model as adopted by the Commission? Included in this issue is the appropriate allocation of switching costs between the port rate and usage rates. The parties agree that reciprocal compensation rates will not be addressed in the expedited hearing.

¹ MTI response to Staff 1-1 and 1-2 and Qwest response to Staff Request 23.
Q. WHAT IS YOUR POSITION ON ISSUE 3?

A. I agree that the total cost of the switch (as determined by the HAI run) should be recovered in the sum of the port and traffic sensitive rates. Qwest's Compliance Filing dated January 10, 2003 shows two different proposed “port” rates. Qwest proposes a port rate of $2.44 and AT&T in that Compliance Filing supported the port rate from the Order of $1.61, which was Staff’s proposal. This problem arises primarily out of an inconsistency in the Order. The Order specifies the port rate should be $1.61. Another portion of the Order specifies that 60% of the switching costs should be considered port (and therefore 40% should be considered traffic sensitive).

The problem is that the $1.61 port rate was not based upon 60% of the switching costs being allocated to the port (The $1.61 was based on 30% of the switching being port costs). If both the $1.61 port rate, and traffic sensitive rates (that are based on 40% of the switch costs as usage) continue to be used, then 100% of the switch costs would not be recovered. This is not a desirable result.

The switching equipment contains traffic sensitive equipment, and also contains non-traffic sensitive equipment (which is termed the "port"). The non-traffic sensitive equipment (port) includes a "line card”. The line card is connected to the loop facilities. The number of line cards required depends on the number of loops, not the level of traffic. Therefore, this cost is considered non-traffic sensitive.

2 Earlier in these proceedings AT&T had proposed a port rate of $1.10
3 Arizona Phase IIA Opinion and Order pg.16
4 Arizona Phase IIA Opinion and Order pg. 17
On the other hand, inside the switch there is what is called the switching network (sometimes called the "switching fabric"). This is the equipment that switches calls. This cost is for switching traffic, and is therefore properly considered to be a traffic sensitive cost.

The exact distribution between the traffic sensitive and non-traffic sensitive costs may vary by switch manufacturer, or by other factors. The number of lines served by the switch could also impact the percent that is traffic sensitive versus non-traffic sensitive. However, for all local switches, a part of the costs is traffic sensitive and part is non-traffic sensitive.

If the Commission once again adopts the $1.61 port rate originally proposed by Staff, then it will be necessary to change the allocation of costs between port and traffic sensitive rates contained in the Order, and increase the usage rates above the levels set in the Order.

Alternatively, if the Commission decides to keep the allocation of 60% to port and 40% to traffic sensitive contained in the Order, the existing port rate would have to change to $2.44. Using the 30 percent port and 70 percent traffic sensitive distribution initially proposed by AT&T, the port rate would be $1.10. Staff originally proposed that the existing $1.61 port rate be maintained because it appeared to be a reasonable compromise between what Qwest and the CLECs ($1.10) were proposing at the time. However, since
I have not conducted a study to determine what the correct mix is for the switching equipment in Arizona, I will review the evidence presented by the parties on this issue.

My recommendation at this time is that the sum of the port and usage rates must recover 100% of the switching costs (as determined by the HAI). This means that either the port rate would have to be higher, or the usage rates would have to be higher, than the rates set in the Order.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.
Qualifications

The Consultant is a consulting engineer specializing in telecommunication regulatory proceedings. He has participated in over 140 state regulatory proceedings as listed on the attached Relevant Work Experience.

The Consultant has provided cost analysis, rate design, jurisdictional separations, depreciation, expert testimony and other related services to state agencies throughout the country in numerous telecommunication state proceedings. The Consultant has also provided depreciation testimony to state agencies throughout the country in several electric utility proceedings.

The Consultant made a presentation pertaining to Video Dial Tone at the NASUCA 1993 Mid-Year Meeting held in St. Louis.

In addition, the Consultant also made a presentation to the NARUC Subcommittee on Economics and Finance at the NARUC Summer Meetings held in July, 1992. That presentation was entitled "The Reason the Industry Wants to Eliminate Cost Based Regulation--Telecommunications is a Declining Cost Industry."

The Consultant provides services almost exclusively to public agencies, including the Public Utilities Commission, the Public Counsel, or the State Department of Administration in various states.

William Dunkel currently provides, or in the past has provided, services in telecommunications proceedings to the following clients:

The Public Utility Commission or the Staffs in the States of:

- Arkansas
- Arizona
- Delaware
- Georgia
- Guam
- Illinois
- Maryland
- Mississippi
- Missouri
- New Mexico
- Utah
- Virginia
- Washington
- U.S. Virgin Islands
The Office of the Public Advocate, or its equivalent, in the States of:

- Colorado
- District of Columbia
- Georgia
- Hawaii
- Illinois
- Indiana
- Iowa
- Maine
- Maryland
- Missouri
- New Jersey
- New Mexico
- Ohio
- Pennsylvania
- Utah
- Washington

The Department of Administration in the States of:

- Illinois
- Minnesota
- South Dakota
- Wisconsin

In April, 1974, the Consultant was employed by the Illinois Commerce Commission in the Electric Section as a Utility Engineer. In November of 1975, he transferred to the Telephone Section of the Illinois Commerce Commission and from that time until July, 1980, he participated in essentially all telephone rate cases and other telephone rate matters that were set for hearing in the State of Illinois. During that period, he testified as an expert witness in numerous rate design cases and tariff filings in the areas of rate design, cost studies and separations. During the period 1975-1980, he was the Separations and Settlements expert for the Staff of the Illinois Commerce Commission.

From July, 1977 until July, 1980, he was a Staff member of the FCC-State Joint Board on Separations, concerning the "Impact of Customer Provision of Terminal Equipment on Jurisdictional Separations" in FCC Docket No. 20981 on behalf of the Illinois Commerce Commission. The FCC-State Joint Board is the national board which specifies the rules for separations in the telephone industry.

The Consultant has taken the AT&T separations school which is normally provided to the AT&T personnel.

The Consultant has taken the General Telephone separations school which is normally provided for training of the General Telephone Company personnel in separations.

Since July, 1980 he has been regularly employed as an independent consultant in telephone rate proceedings across the nation.
He has testified before the Illinois House of Representatives Subcommittee on Communications, as well as participating in numerous other schools and conferences pertaining to the utility industry.

Prior to employment at the Illinois Commerce Commission, the Consultant was a design engineer for Sangamo Electric Company designing electric watt-hour meters used in the electric utility industry. The Consultant was granted patent No. 3822400 for a solid state meter pulse initiator.

The Consultant graduated from the University of Illinois in February, 1970 with a Bachelor's of Science Degree in Engineering Physics with emphasis on economics and other business-related subjects. The Consultant has taken several post-graduate courses since graduation.
APENDIX A

RELEVANT WORK EXPERIENCE OF
WILLIAM DUNKEL

ARIZONA
- U.S. West Communications
  Wholesale cost/UNE case
  General rate case
  Depreciation case
  General rate case

ARIZONA
- Southwestern Bell Telephone Company

ARKANSAS
- Southwestern Bell Telephone Company

CALIFORNIA
(on behalf of the Office of Ratepayer Advocates (ORA))
- Kerman Telephone General Rate Case

CALIFORNIA
(on behalf of the California Cable Television Association)
- General Telephone of California
- Pacific Bell
  Fiber Beyond the Feeder Pre-Approval
  Requirement

COLORADO
- Mountain Bell Telephone Company
  General Rate Case
  Call Trace Case
  Caller ID Case
  General Rate Case
  Local Calling Area Case
  General Rate Case
  General Rate Case
  General Rate Case
  General Rate Case
  General Rate Case
  General Rate Case
  Measured Services Case
  Independent Telephone Companies
  Cost Allocation Methods Case

DELAWARE
- Diamond State Telephone Company
  General Rate Case
  General Rate Case
  Report on Small Centrex

Cost of Service Study
Docket No. T-00000A-00-0194
Docket No. E-1051-93-183
Docket No. T-01051B-97-0689
Docket No. T-01051B-99-0105

Docket No. 83-045-U
A.02-01-004
1.87-11-033
Docket No. 96A-218T et al.
Docket No. 92S-040T
Docket No. 91A-462T
Docket No. 90S-544T
Docket No. 1766
Docket No. 1720
Docket No. 1700
Docket No. 1655
Docket No. 1575
Docket No. 1620
Docket No. 89R-608T
PSC Docket No. 82-32
PSC Docket No. 84-33
PSC Docket No. 85-32T
APPENDIX A

General Rate Case
Centrex Cost Proceeding

PSC Docket No. 86-20
PSC Docket No. 86-34

DISTRICT OF COLUMBIA
- C&P Telephone Company of D.C.
  Depreciation issues
  Formal Case No. 926

FCC
- Review of jurisdictional separations
  FCC Docket No. 96-45
- Developing a Unified Intercarrier
  Compensation Regime
  CC Docket No. 01-92

FLORIDA
- BellSouth, GTE, and Sprint
  Fair and reasonable rates
  Undocketed Special Project

GEORGIA
- Southern Bell Telephone & Telegraph Co.
  General Rate Proceeding
  Docket No. 3231-U
  General Rate Proceeding
  Docket No. 3465-U
  General Rate Proceeding
  Docket No. 3286-U
  General Rate Proceeding
  Docket No. 3393-U

HAWAII
- GTE Hawaiian Telephone Company
  Depreciation/separations issues
  Docket No. 94-0298
  Resale case
  Docket No. 7702

ILLINOIS
- Verizon North Inc. and Verizon South Inc.
  DSL Waiver Petition Proceeding
  Docket No. 02-0560
- Genesee Telephone Company
  EAS case
  Docket No. 99-0412
- Central Telephone Company
  (Staunton merger)
  Docket No. 78-0595
- General Telephone & Electronics Co.
  Usage sensitive service case
  Docket Nos. 98-0200/98-0537
  General rate case (on behalf of CUB)
  Docket No. 93-0301
  Usage sensitive rates
  Docket No. 79-0141
  (Data Service)
  Docket No. 79-0310
  (Certificate)
  Docket No. 79-0499
  (Certificate)
  Docket No. 79-0500
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- General Telephone Co.
- Ameritech (Illinois Bell Telephone Company)
  Alternative Regulation Review
  Area code split case
  General Rate Case
  (Centrex filing)
  General Rate Proceeding
  (Call Lamp Indicator)
  (Com Key 1434)
  (Card dialers)
  (Concentration Identifier)
  (Voice of the People)
  (General rate increase)
  (Dimension)
  (Customer controlled Centrex)
  (TAS)
  (Ill. Consolidated Lease)
  (EAS Inquiry)
  (Dispute with GTE)
  (WUI vs. Continental Tel.)
  (Carle Clinic)
  (Private line rates)
  (Toll data)
  (Dataphone)
  (Com Key 718)
  (Complaint - switchboard)
  (Porta printer)
  (General rate case)
  (Certificate)
  (General rate case)
  (Other minor proceedings)
- Home Telephone Company
- Northwestern Telephone Company
  Local and EAS rates
  EAS

INDIANA
- Public Service of Indiana (PSI)
  Depreciation issues
- Indianapolis Power and Light Company
  Depreciation issues

IOWA
APPENDIX A

- U S West Communications, Inc.
  Local Exchange Competition
  Local Network Interconnection
  General Rate Case

KANSAS
- Southwestern Bell Telephone Company
  Commission Investigation of the KUSF
  Docket No. 98-SWBT-677-GIT
- Rural Telephone Service Company
  Audit and General rate proceeding
  Request for supplemental KUSF
  Docket No. 00-RRLT-083-AUD
  Docket No. 00-RRLT-518-KSF
- Southern Kansas Telephone Company
  Audit and General rate proceeding
  Docket No. 01-SNKT-544-AUD
- Pioneer Telephone Company
  Audit and General rate proceeding
  Docket No. 01-PNRT-929-AUD
- Craw-Kan Telephone Cooperative, Inc.
  Audit and General rate proceeding
  Docket No. 01-CRKT-713-AUD
- Sunflower Telephone Company, Inc.
  Audit and General rate proceeding
  Docket No. 01-SFLT-879-AUD
- Bluestem Telephone Company, Inc.
  Audit and General rate proceeding
  Docket No. 01-BSST-878-AUD
- Home Telephone Company, Inc.
  Audit and General rate proceeding
  Docket No. 01-HOMT-209-AUD
- Wilson Telephone Company, Inc.
  Audit and General rate proceeding
  Docket No. 02-WLST-210-AUD
- S&T Telephone Cooperative Association, Inc.
  Audit and General rate proceeding
  Docket No. 02-S&TT-390-AUD
- Blue Valley Telephone Company, Inc.
  Audit and General rate proceeding
  Docket No. 02-BLVT-377-AUD
- JBN Telephone Company
  Audit and General rate proceeding
  Docket No. 02-JBNT-846-AUD
- S&A Telephone Company
  Audit and General rate proceeding
  Docket No. 03-S&AT-160-AUD

MAINE
- New England Telephone Company
  General rate proceeding
  Docket No. 92-130

MARYLAND
- Chesapeake and Potomac Telephone Company
  General rate proceeding
  Docket No. 7851
  Cost Allocation Manual Case
  Case No. 8333
  Cost Allocation Issues Case
  Case No. 8462
- Verizon Maryland
  PICC rate case
  USF case
  Case No. 8862
  Case No. 8745

MINNESOTA
- Access charge (all companies)
  Docket No. P-321/CI-83-203
- U. S. West Communications, Inc. (Northwestern Bell Telephone Co.)
  Centrex/Centron proceeding
  Docket No. P-421/91-EM-1002
  General rate proceeding
  Docket No. P-321/M-80-306
  Centrex Dockets
  MPUC No. P-421/M-83-466
  MPUC No. P-421/M-84-24
  MPUC No. P-421/M-84-25
  MPUC No. P-421/M-84-26
  General rate proceeding
  MPUC No. P-421/GR-80-911
  General rate proceeding
  MPUC No. P-421/GR-82-203
  General rate case
  MPUC No. P-421/GR-83-600
  WATS investigation
  MPUC No. P-421/CI-84-454
  Access charge case
  MPUC No. P-421/CI-85-352
  Access charge case
  MPUC No. P-421/M-86-53
  Toll Compensation case
  MPUC No. P-999/CI-85-582
  Private Line proceeding
  Docket No. P-421/M-86-508
- AT&T
  Intrastate Interexchange
  Docket No. P-442/M-87-54

MISSISSIPPI
- South Central Bell
  General rate filing
  Docket No. U-4415

MISSOURI
- Southwestern Bell
  General rate proceeding
  TR-79-213
  General rate proceeding
  TR-80-256
  General rate proceeding
  TR-82-199
  General rate proceeding
  TR-86-84
  General rate proceeding
  TC-89-14, et al.
  Alternative Regulation
  TC-93-224/TO-93-192
- United Telephone Company
  Depreciation proceeding
  TR-93-181
- All companies
  Extended Area Service
  TO-86-8
  EMS investigation
  TO-87-131
  Cost of Access Proceeding
  TR-2001-65
NEW JERSEY

- New Jersey Bell Telephone Company
  General rate proceeding
  General rate proceeding
  Phase I - General rate case
  General rate case
  Division of regulated
  from competitive services
  Customer Request Interrupt

NEW MEXICO

- U.S. West Communications, Inc.
  E-911 proceeding
  General rate proceeding
  General rate/depreciation proceeding
  Subsidy Case
  USF Case
- VALOR Communications
  Subsidy Case

OHIO

- Ohio Bell Telephone Company
  General rate proceeding
  General rate increase
  Access charges
- General Telephone of Ohio
  General rate proceeding
- United Telephone Company
  General rate proceeding

OKLAHOMA

- Public Service of Oklahoma
  Depreciation case

PENNSYLVANIA

- GTE North, Inc.
  Interconnection proceeding
- Bell Telephone Company of Pennsylvania

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<td>Docket No. R-953409</td>
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<td>Rate Rebalance</td>
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<td>Enterprise Telephone Company General rate proceeding</td>
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<td>All companies InterLATA Toll Service Invest.</td>
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<td>Joint Petition for Global Resolution of Telecommunications Proceedings</td>
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<td>UTAH</td>
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APPENDIX A

General rate case

VIRGINIA
- General Telephone Company of the South
  Jurisdictional allocations
  Separations

WASHINGTON
- US West Communications, Inc.
  Interconnection case
  General rate case
- All Companies-

WISCONSIN
- Wisconsin Bell Telephone Company
  Private line rate proceeding
  General rate proceeding

Docket No. 316
Case No. PUC870029
Case No. PUC950019
Docket No. UT-960369
Docket No. UT-950200
Analyzed the local calling areas in the State
Docket No. 6720-TR-21
Docket No. 6720-TR-34