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BY HAND DELIVERY

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 950985-TP (Sprint/GTEFL)

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Metro Access
Transmission Services, Inc. (MCImetro) in the above referenced
docket are the original and 15 copies of the direct testimony of
Don Price and Dr. Nina W. Cornell.

By copy of this letter this document has been provided to
the parties on the attached service list.

Very truly yours,

Richard D. Melson

Richard D. Melson

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Price
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by hand delivery (**) or next business day delivery by UPS (*) this 6th day of February, 1996.

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DOCKET NO. 950985-TP
(MFS INTERCONNECTION PETITIONS RE SPRINT/GTEFL)
DIRECT TESTIMONY OF DON PRICE
ON BEHALF OF
MCI METRO ACCESS TRANSMISSION SERVICES, INC.

February 6, 1996

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Don Price, and my business address is 701 Brazos, Suite 600, Austin, Texas, 78701.

Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?

A. I am employed by MCI Telecommunications Corporation as Regional Manager, Local Competition Policy, Southern Region State Regulatory and Governmental Affairs.

Q. WHAT ARE YOUR PROFESSIONAL QUALIFICATIONS AND EXPERIENCE?

A. I have provided as Exhibit ___ (DGP-1) to this testimony a listing of my professional qualifications and experience.

Q. HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE THIS COMMISSION?

A. Yes. Also, I have testified in a number of regulatory proceedings in various states in the BellSouth and Southwestern Bell regions.

1 Included in Exhibit ___ (DGP-1) is a list of proceedings in which I
2 have presented testimony.

3

4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
5 PROCEEDING?

6 A. My testimony will describe MCImetro's position on a few of the
7 key technical, financial and operational arrangements that are
8 necessary for the provision of ALEC service by MCImetro. These
9 items have been discussed in the preliminary negotiations between
10 MCImetro and Sprint-United, Sprint-Centel, and GTE Florida
11 Incorporated. Those negotiations are still on-going, and have not
12 reached an impasse, so MCImetro has not been required to file its
13 own interconnection petition with the Commission. Nevertheless,
14 the Commission's decision on the petitions filed in this docket by
15 MFS and others may well set a precedent, and MCImetro has an
16 interest in seeing that any decision addresses the technical and
17 operational items that are of particular concern to it.

18

19 Q. WHO IS MCIMETRO ACCESS TRANSMISSION SERVICES, INC.?

20 A. MCImetro Access Transmission Services, Inc. ("MCImetro") is a
21 wholly owned indirect subsidiary of MCI Telecommunications
22 Corporation, the certificated long distance provider. The creation
23 of MCImetro was announced by MCI on January 4, 1994. That
24 announcement stated that MCImetro was expected to invest \$2
25 billion in fiber rings and local switching infrastructure in major U.S.

1 metropolitan markets, and was the MCI subsidiary that will operate
2 as a local telecommunications service provider.

3 The 1994 annual report to shareholders of MCI
4 Communications Corporation stated that the planned capital
5 expenditures for MCImetro for 1995 were \$500 million. Since its
6 formation, MCImetro has obtained regulatory approval to provide
7 competitive local exchange services in 13 states, and has pending
8 applications for such authority in another 5 states.

9 On June 30, 1995, pursuant to s.364.337(6)(b), Florida
10 Statutes, MCImetro provided notice to this Commission of its
11 intent to provide alternative local exchange telecommunications
12 services. On October 11, 1995, this Commission issued its Order
13 No. PSC-95-1256-FOF-TX acknowledging MCImetro's intent to
14 provide alternative local exchange services effective January 1,
15 1996.

16

17 Q. WHAT ARE THE APPROPRIATE ARRANGEMENTS FOR PAYMENT
18 OF ACCESS CHARGES ON INTEREXCHANGE CALLS
19 TERMINATED TO A NUMBER THAT HAS BEEN "PORTED" TO AN
20 ALEC?

21 A. The ALEC should receive access charges on interexchange calls
22 terminated to a number that has been "ported" to the ALEC. As
23 I noted in my testimony in the recent docket on temporary number
24 portability mechanisms, "the use of RCF as a temporary number
25 portability mechanism introduces administrative problems in

1 ensuring that the ALEC receives the appropriate terminating access
2 charges for toll calls placed to a "ported" customer."

3 As I described in that testimony, an interexchange call
4 placed to a "ported" customer of an ALEC will first go to Sprint or
5 GTEFL, who would "terminate" the call to the central office that
6 previously served the customer. Then, using the RCF temporary
7 number portability mechanism, the incumbent LEC would "re-
8 originate" the call to the telephone number assigned to the
9 customer by the ALEC. This example demonstrates that the ALEC,
10 and *not* Sprint or GTEFL, would be performing the function of
11 terminating the call to the called party. The incumbent LEC's
12 billing systems would, however, have concluded that the call was
13 "terminated" by Sprint or GTEFL at the point where it was
14 forwarded to the ALEC's network using RCF, and the incumbent
15 LEC would seek to assess terminating switched access charges on
16 the carrier who had delivered the call to its network.

17 The only reason Sprint or GTEFL is in the call path for the
18 call -- and thus has the potential to assess terminating access
19 charges -- is because of the RCF mechanism which it chose to
20 recommend for providing temporary number portability. A true
21 database solution for number portability would have routed the call
22 directly to the ALEC, recognizing that the call was to be terminated
23 to the ALEC rather than to a customer of the incumbent LEC.
24 Under a true number portability solution the ALEC would be able
25 to appropriately bill the carrier without the type of administrative

1 complexities raised by the use of RCF as a temporary number
2 portability mechanism.

3 The Commission should also recognize that its order in the
4 temporary number portability proceeding established rates that
5 were above Sprint's and GTEFL's economic costs of providing
6 RCF. Because these companies cannot claim that they have
7 unrecovered costs associated with the provision of RCF, they have
8 no basis to claim a right to any terminating access revenues to a
9 number that has been "ported" to ALEC. If either Sprint or GTEFL
10 collects any access revenues for such calls, it should be required
11 to remit all such revenues to ALEC.

12

13 Q. WHAT ARE THE APPROPRIATE ORDER PROCESSING
14 ARRANGEMENTS BETWEEN ALECs AND SPRINT/GTEFL?

15 A. Intercompany procedures must be developed to support the
16 ordering of unbundled loops, interoffice facilities (including point of
17 interconnection ["POI"] arrangements and trunks), interim number
18 portability mechanisms (such as Remote Call Forwarding), and
19 customer listing databases which support the white pages
20 directory and directory assistance databases. These procedures
21 must support ordering in a "network of networks" environment.

22 The "back office systems" used by a company are almost
23 always automated. There are obvious reasons for such automation
24 such as operating efficiency, the need for automated interfaces
25 with billing systems, and the need to track the various work

1 processes at each step in turning up (or taking down) service. It
2 is easy to imagine the administrative nightmare that would result
3 if thousands of transactions each day were handled on a paper
4 basis. There would be no way to determine whether any progress
5 had been made in fulfilling a request for service, or if so, at what
6 stage of fulfillment that order was. And billing system errors
7 would be rampant because of the need to manually enter each and
8 every transaction separately from the taking of the order.
9 Therefore, Sprint and GTEFL should be required to develop as soon
10 as possible, but in any event within one year, mechanized systems
11 for the ordering of unbundled loops, interoffice facilities, interim
12 number portability mechanisms, customer listing databases, and
13 any other service or function necessary for the interoperability of
14 their networks with those of the ALECs. Such mechanized
15 interfaces are used in the day-to-day interactions between LECs
16 and IXC. Anything short of automated or mechanized
17 intercompany procedures would be unworkable.

18

19 Q. WHAT ARE THE APPROPRIATE ARRANGEMENTS FOR THE
20 ENTRY OF ALEC CUSTOMER INFORMATION INTO SPRINT'S AND
21 GTEFL'S 911 DATABASES?

22 A. Sprint and GTEFL should be required to cooperate with ALECs to
23 ensure that ALECs' customer data is in the proper format for
24 inclusion in the 911 Automatic Location Identification (ALI)
25 database. Customer data -- and specifically the street addresses -

1 - are edited against a database referred to as the master street
2 address guide ("MSAG") to ensure that the uniform listing of street
3 addresses. This is so that emergency personnel will have a
4 consistent reference for every address to which they may be called
5 to render service. Thus, the public safety and welfare requires that
6 Sprint and GTEFL either make the MSAG available to the ALECs,
7 or cooperate in the editing of ALECs' customer data against the
8 MSAG for inclusion in the ALI database(s). For the same reasons
9 noted above with respect to ordering systems, Sprint and GTEFL
10 should be required to permit ALEC access to the same mechanized
11 systems they use to edit customer data against the MSAG. That
12 access should be via a mechanized interface, and should be
13 provided as soon as possible. A reasonable time frame for Sprint
14 and GTEFL to be able to furnish ALI data entry capability would be
15 the date of the final order in this proceeding for paper copy. Then,
16 within 30 days from that date, Sprint and GTEFL should furnish
17 ALECs with automated entry capability.

18
19 Q. WHAT ARE THE APPROPRIATE ARRANGEMENTS FOR THE
20 SUPPORT OF REPAIR SERVICE?

21 A. Intercompany procedures must be developed to support repair
22 services in a "network of networks" environment. As noted above,
23 the "back office systems" used by a company are almost always
24 automated, for obvious reasons of operating efficiency and the
25 need to track progress in isolating and clearing customer trouble.

1 It would be an administrative nightmare if repair services were to
2 be handled on a paper basis. Neither company would be able to
3 determine whether any progress had been made in isolating or
4 clearing an incidence of trouble, or even whether someone had
5 been dispatched to work on a particular incidence. Anything short
6 of automated or mechanized intercompany procedures would be
7 virtually unworkable. Therefore Sprint and GTEFL should be
8 required to develop mechanized systems for processes such as
9 referral of trouble tickets, and to implement those systems as soon
10 as possible.

11 Sprint and GTEFL must also develop procedures that will
12 permit ALECs to isolate trouble both on trunking facilities to the
13 POI and on unbundled network facilities -- such as loop facilities --
14 leased from Sprint and GTEFL. Otherwise, efforts to clear
15 incidences of customer trouble will be constrained by the lack of
16 appropriate intercompany procedures for testing of various
17 network elements. The absence of such procedures could create
18 an undeserved impression that the ALEC is not capable of
19 providing high quality service. Customers should be won or lost
20 on the basis of fair competition, and not as a result of the
21 incumbent's failure to implement appropriate procedures for
22 handling of repair issues.

23

24 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

25 A. Yes, it does.

ACADEMIC AND PROFESSIONAL QUALIFICATIONS OF DON PRICE

Academic Background:

My academic background is in the social sciences. I received my Bachelor of Arts degree in Sociology from the University of Texas at Arlington in May of 1977, and was awarded a Master of Arts degree in Sociology by the University of Texas at Arlington in December, 1978.

Professional Qualifications:

From January, 1979 until October, 1983, I was employed by the Southwest telephone operating company of GTE where I held several positions of increasing responsibility in Economic Planning where I became acquainted with such local exchange telephone company functions as the workings and design of the local exchange network, the network planning process, the operation of a business office, and the design and operation of a large billing system.

From November 1983 until November 1986, I was employed by the Public Utility Commission of Texas (PUCT). I initially provided analysis and expert testimony on a variety of rate design issues including setting of rates for switched and special access services, MTS, WATS, EAS, and local exchange service. In 1986 I was promoted to Manager of Rates and Tariffs, and was directly responsible for staff

analyses of rate design and tariff issues in all telecommunications proceedings before the Texas Commission.

I have been with MCI for nearly nine years, all of which has been in the regulatory arena. In my present position, I have broad responsibilities in monitoring and participating in telephone-related state regulatory and legislative proceedings throughout the Southwestern Bell and BellSouth service areas, primarily focused on the policy issues surrounding local competition.

I have presented testimony before a number of state commissions, including the Public Service Commission of Arkansas, the Public Service Commission of Florida, the Kansas Corporation Commission, the Louisiana Public Service Commission, the Missouri Public Service Commission, the North Carolina Utilities Commission, the Corporation Commission of the State of Oklahoma, the Public Service Commission of South Carolina, the Public Service Commission of Tennessee , and the Public Utility Commission of Texas. A list of those proceedings in which I have furnished testimony is provided on the following pages.

**TESTIMONY PRESENTED BEFORE
REGULATORY UTILITY COMMISSIONS**

Arkansas

Docket No. 91-051-U: IN RE IMPLEMENTATION OF TITLE IV OF THE AMERICANS WITH DISABILITIES ACT OF 1990

Docket No. 92-079-R: IN THE MATTER OF A PROCEEDING FOR THE DEVELOPMENT OF RULES AND POLICIES CONCERNING OPERATOR SERVICE PROVIDERS

Florida

Docket No. 941272-TL: IN RE: SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S PETITION FOR APPROVAL OF NUMBERING PLAN AREA RELIEF FOR 305 AREA CODE

Docket No. 950696-TP: IN RE: DETERMINATION OF FUNDING FOR UNIVERSAL SERVICE AND CARRIER OF LAST RESORT RESPONSIBILITIES.

Docket No. 950737-TP: IN RE: INVESTIGATION INTO TEMPORARY LOCAL TELEPHONE NUMBER PORTABILITY SOLUTION TO IMPLEMENT COMPETITION IN LOCAL EXCHANGE TELEPHONE MARKETS.

Kansas

Docket No. 190,492-U: IN THE MATTER OF A GENERAL INVESTIGATION INTO COMPETITION WITHIN THE TELECOMMUNICATIONS INDUSTRY IN THE STATE OF KANSAS

Louisiana

Docket No. U-17957: IN RE: INVESTIGATION OF OPERATING PRACTICES OF ALTERNATIVE OPERATOR SERVICES PROVIDERS TO INCLUDE RATES AND CHARGES

Docket No. U-19806: IN RE: PETITION OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., FOR REDUCED REGULATION OF INTRA-STATE OPERATIONS

Docket No. U-20237: IN RE: OBJECTIONS TO THE FILING OF REDUCED WATS SAVER SERVICE RATES, INTRALATA, STATE OF LOUISIANA

Docket No. U-20710: IN RE: GENERIC HEARING TO CLARIFY THE PRICING/IMPUTATION STANDARD SET FORTH IN COMMISSION ORDER NO. U-17949-N ON A PROSPECTIVE BASIS ONLY, AS THE STANDARD RELATES TO LEC COMPETITIVE TOLL OFFERINGS

Missouri

Case No. TO-87-42: IN THE MATTER OF SOUTHWESTERN BELL TELEPHONE COMPANY FILING ACCESS SERVICES TARIFF REVISIONS AND WIDE AREA TELECOMMUNICATIONS SERVICE (WATS) TARIFF, INDEX, 6th REVISED SHEET, ORIGINAL SHEET 16.01

Case No. TO-95-289, et al: IN THE MATTER OF AN INVESTIGATION INTO THE EXHAUSTION OF TELEPHONE NUMBERS IN THE 314 NUMBERING PLAN AREA

North Carolina

Docket No. P-100, SUB 119: IN THE MATTER OF: ASSIGNMENT OF N11 DIALING CODES

Oklahoma

Consolidated Dockets PUD NO. 000237: IN THE MATTER OF THE APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY FOR AN ORDER APPROVING PROPOSED CHANGES AND ADDITIONS IN APPLICANTS' WIDE AREA TELECOMMUNICATIONS SERVICE PLAN TARIFF; and

PUD NO. 000254: IN THE MATTER OF THE APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY FOR AN ORDER APPROVING PROPOSED

**ADDITIONS AND CHANGES IN APPLICANTS' ACCESS SERVICE TARIFF AND
WIDE AREA TELECOMMUNICATIONS SERVICE PLAN TARIFF**

**Consolidated Dockets PUD NO. 920001335: IN THE MATTER OF THE
APPLICATION OF THE OKLAHOMA RURAL TELEPHONE COALITION, GTE
SOUTHWEST, INC., ALLTEL OKLAHOMA, INC., AND OKLAHOMA ALLTEL,
INC. FOR AN ORDER ADOPTING THE OKLAHOMA ALTERNATIVE SETTLE-
MENT PLAN; and**

**PUD NO. 920001213: IN THE MATTER OF THE APPLICATION OF SOUTH-
WESTERN BELL TELEPHONE COMPANY FOR AN ORDER IMPLEMENTING
TERMINATING ACCESS CHARGES IN LIEU OF INTRALATA TOLL AND
SURCHARGE POOLS; and**

**PUD NO. 940000051: IN RE: INQUIRY OF THE OKLAHOMA CORPORATION
COMMISSION REGARDING WHETHER THE INTRALATA TOLL POOL AND SUR-
CHARGE POOL SHOULD CONTINUE TO EXIST IN THE STATE OF OKLAHOMA**

South Carolina

**Docket No. 92-606-C: IN RE: GENERIC PROCEEDING TO REVIEW THE USE OF
N11 SERVICE CODES**

Tennessee

**Docket No. 93-07799: IN RE: SHOW CAUSE PROCEEDING AGAINST CERTIFIED
IXCS AND LECS TO PROVIDE TOLL FREE, COUNTY-WIDE CALLING**

**Docket No. 94-00184: INQUIRY FOR TELECOMMUNICATIONS RULE-MAKING
REGARDING COMPETITION IN THE LOCAL EXCHANGE**

**Docket No. 93-08793: IN RE: APPLICATION OF MCI METRO ACCESS TRANS-
MISSION SERVICES, INC. FOR AUTHORITY TO OFFER LOCAL EXCHANGE
SERVICES WITHIN TENNESSEE**

**Docket No. 95-02499: UNIVERSAL SERVICE PROCEEDING, PART 1 -- COST OF
UNIVERSAL SERVICE AND CURRENT SOURCES OF UNIVERSAL SERVICE
SUPPORT, AND PART 2 -- ALTERNATIVE UNIVERSAL SERVICE SUPPORT
MECHANISMS**

Texas

Docket 4992: APPLICATION OF GENERAL TELEPHONE COMPANY OF THE SOUTHWEST FOR A RATE/TARIFF REVISION

Docket 5113: PETITION OF PUBLIC UTILITY COMMISSION FOR AN INQUIRY CONCERNING THE EFFECTS OF THE MODIFIED FINAL JUDGMENT AND THE ACCESS CHARGE ORDER UPON SW BELL AND THE INDEPENDENT TELEPHONE COMPANIES OF TEXAS (Phase II)

Docket 5610: APPLICATION OF GENERAL TELEPHONE COMPANY OF THE SOUTHWEST FOR A RATE INCREASE

Docket 5800: APPLICATION OF AT&T COMMUNICATIONS FOR AUTHORITY TO IMPLEMENT "REACH OUT TEXAS"

Docket 5898: APPLICATION OF SAN ANGELO FOR REMOVAL OF THE EXTENDED AREA SERVICE CHARGE FROM GENERAL TELEPHONE COMPANY OF THE SOUTHWEST'S RATES IN SAN ANGELO, TEXAS

Docket 5926: APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY TO ESTABLISH FEATURE GROUP "E" (FGE) ACCESS SERVICE FOR RADIO AND CELLULAR COMMON CARRIERS

Docket 5954: INQUIRY OF THE PUBLIC UTILITY COMMISSION OF TEXAS INTO OFFERING EXTENDED AREA SERVICE IN THE CITY OF ROCKWALL

Docket 6095: APPLICATION OF AT&T COMMUNICATION FOR A RATE INCREASE

Docket 6200: PETITION OF SOUTHWESTERN BELL TELEPHONE COMPANY FOR AUTHORITY TO CHANGE RATES

Docket 6264: PETITION OF THE GENERAL COUNSEL FOR INITIATION OF AN EVIDENTIARY PROCEEDING TO ESTABLISH TELECOMMUNICATIONS SUBMARKETS

Docket 6501: APPLICATION OF VALLEY VIEW TELEPHONE COMPANY FOR AN AMENDMENT TO CERTIFICATE OF CONVENIENCE AND NECESSITY

- Docket 6635: APPLICATION OF MUSTANG TELEPHONE COMPANY FOR AUTHORITY TO CHANGE RATES
- Docket 6740: APPLICATION OF SOUTHWEST TEXAS TELEPHONE COMPANY FOR RATE INCREASE
- Docket 6935: APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY TO INTRODUCE MICROLINK II - PACKET SWITCHING DIGITAL SERVICE
- Docket 8730: INQUIRY OF THE GENERAL COUNSEL INTO THE MEET-POINT BILLING PRACTICES OF GTE SOUTHWEST, INC.
- Docket 8218: INQUIRY OF THE GENERAL COUNSEL INTO THE WATS PRORATE CREDIT
- Docket 8585: INQUIRY OF THE GENERAL COUNSEL INTO THE REASONABLENESS OF THE RATES AND SERVICES OF SOUTHWESTERN BELL TELEPHONE COMPANY
- Docket 10127: APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY TO REVISE SECTION 2 OF ITS INTRASTATE ACCESS SERVICE TARIFF
- Docket 11441: PETITIONS OF INFODIAL, INC., AND OTHERS FOR ASSIGNMENT OF ABBREVIATED N11 DIALING CODES
- Docket 11840: JOINT PETITION OF SOUTHWESTERN BELL TELEPHONE COMPANY AND GTE SOUTHWEST, INC. TO PROVIDE EXTENDED AREA SERVICE TO CERTAIN COMMUNITIES IN THE LOWER RIO GRANDE VALLEY
- Docket 14447: PETITION OF MCI TELECOMMUNICATIONS CORPORATION FOR AN INVESTIGATION OF THE PRACTICES OF SOUTHWESTERN BELL TELEPHONE COMPANY REGARDING THE EXHAUSTION OF TELEPHONE NUMBERS IN THE 214 NUMBERING PLAN AREA AND REQUEST FOR A CEASE AND DESIST ORDER AGAINST SOUTHWESTERN BELL TELEPHONE COMPANY