NANCY B. WHITE General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (404) 335-0710

December 11, 1995

Mrs. Blanca S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

RE: Docket No. 950984B-TP (MCImetro)

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Dr. Aniruddha (Andy) Banerjee and Robert C. Scheye in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached ACK Certificate of Service.

Sincerely,

Nancy B. White (AS)
Nancy B. White

Enclosures

cc: All Parties of Record

A. M. Lombardo

R. G. Beatty

R. D. Lackey

RECEIVED & F.

DOCUMENT I MBER-DATE

12461 DEC118

FP30-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
12460 DEC 11 &

PASC-RECORDS/REPORTING

CERTIFICATE OF SERVICE Docket No. 950984A-TP Docket No. 950984B-TP

I HEREBY CERTIFY that a copy of the foregoing has been

furnished by Federal Express this 11th day of December, 1995 to:

RICHARD H. BRASHEAR ALLTELL FLORIDA, INC. 206 WHITE STREET LIVE OAK, FL 32060 904-364-2517

F. B. POAG
CENTRAL TELEPHONE COMPANY
OF FLORIDA
555 LAKE BORDER DRIVE
APOPKA, FL 32703
407-889-6405

LAURIE A. MAFFETT
FRONTIER COMMUNICATIONS OF
THE SOUTH, INC.
180 SOUTH CLINTON AVENUE
ROCHESTER, NY 14646
716-777-5125

BEVERLY Y. MENARD
GTE FLORIDA, INC.
106 EAST COLLEGE AVENUE
SUITE 1440
TALLAHASSEE, FL 32301
813-224-4825

A. D. LANIER
GULF TELEPHONE COMPANY
115 W. DREW STREET
PERRY, FL 32347
904-584-0900

ROBERT M. POST, JR.
INDIANTOWN TELEPHONE
SYSTEM, INC.
16001 S.W. MARKET STREET
INDIANTOWN, FL 34956
407-597-3113

JOHN T. MCGLEW
N.E. FLORIDA TELEPHONE
COMPANY, INC.
130 N. 4TH STREET
MACCLENNY, FL 32063
904-259-2261

DANIEL V. GREGORY
QUINCY TELEPHONE COMPANY
107 W. FRANKLIN STREET
QUINCY, GL 32351
904-875-5214

JOHN H. VAUGHAN
ST. JOSEPH TELEPHONE AND
TELEGRAPH COMPANY
502 5TH STREET
PORT ST. JOE, FL 32456
904-229-7221

FERRIN SEAY
FLORALA TELEPHONE
COMPANY, INC.
522 N. 5TH STREET
FLORALA, AL 36442
334-858-3211

LYNN B. HALL
VISTA-UNITED
TELECOMMUNICATIONS
P.O. BOX 10180
LAKE BUENA VISTA, FL 32830
407-827-2210

JODIE DONOVAN
TCG SOUTH FLORIDA
1133 21ST STREET, NW
SUITE 400
WASHINGTON, DC 20036
202-739-0010

MICHAEL W. TYE
AT&T
101 NORTH MONROE STREET
SUITE 700
TALLAHASSEE, FL 32301
904-425-6360

ROBIN D. DUNSON, ESQ. 1200 PEACHTREE STREET, NE PROMENADE I, ROOM 4038 ATLANTA, GEORGIA 30309 810-8689 RICHARD D. MELSON HOPPING GREEN SAM & SMITH 123 S. CALHOUN STREET TALLAHASSEE, FL 32301 904-222-7500

PATRICK K. WIGGINS
INTERMEDIA COMMUNICATIONS OF
FLORIDA, INC.
WIGGINS & VILLACORTA
501 EAST TENNESSEE STREET, #B
TALLAHASSEE, FL 32308

904-222-1534

FLOYD SELF
MCCAW COMMUNICATIONS
MESSER, VICKERS, CAPARELLO,
MADSEN, LEWIS, GOLDMAN & METZ
215 S. CALHOUN STREET, #701
TALLAHASSEE, FL 32301
904-222-0720

BOB ELIAS
FLORIDA PUBLIC SERVICE
COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FL 32399
904-613-6189

JAMES C. FALVEY
SWIDLER & BERLIN, CHARTERED
3000 K STREET, NW
SUITE 300
WASHINGTON, DC 20007
202-424-7500

RICHARD M. RINDLER

KENNETH A. HOFFMAN, ESQ.
RUTLEDGE, ECENIA, UNDERWOOD,
PURNELL & HOFFMAN
215 SOUTH MONROE STREET
SUITE 420
TALLAHASSEE, FL 32301-1841
904-681-6788

PAUL KOUROUPAS
DIRECTOR, REGULSTORY AFFAIRS
TELEPORT COMM. GROUP INC.
TWO TELEPORT DRIVE
SUITE 300
STATEN ISLAND, NY 10311
718-355-2634

MICHAEL J. HENRY
MCI TELECOMMUNICATIONS CORP.
780 JOHNSON FERRY ROAD
SUITE 700
ATLANTA, GEORGIA 30342
843-6373

PETER M. DUNBAR, ESQ.
CHARLES W. MURPHY, ESQ.
PENNINGTON & HABEN, P.A.
215 SOUTH MONROE STREET
2ND FLOOR
TALLAHASSEE, FL 32301
904-222-3533

JILL BUTLER
FLORIDA REGULATORY DIRECTOR
TIME WARNER COMMUNICATIONS
2773 RED MAPLE RIDGE
TALLAHASSEE, FL 32301
904-942-1181

LAURA L. WILSON, ESQ. CHARLES F. DUDLEY, ESQ. FLORIDA CABLE TELECOMMUNICATIONS ASSN. 310 N. MONROE STREET TALLAHASSEE, FL 32301 904-681-1990

WILLIAM H. HIGGINS
AT&T WIRELESS SERVICES
SUITE 900
250 S. AUSTRALIAN AVENUE
WEST PALM BEACH, FL 33401
407-655-7447

KIMBERLY CASWELL GTE FLORIDA, INC. c/o RICHARD M. FLETCHER 106 EAST COLLEGE AVENUE SUITE 1440 TALLAHASSEE, FL 32301 813-228-3087

ANTHONY P. GILLMAN

TIMOTHY DEVINE
MFS COMMUNICATIONS
250 WILLIAMS STREET
SUITE 2200
ATLANTA, GA 30303
404-224-6115

DONALD L. CROSBY
CONTINENTAL CABLEVISION
7800 BELFORT PARKWAY
SUITE 270
JACKSONVILLE, FL 32256
904-731-8810

A. R. SCHLEIDEN
CONTINENTAL FIBER
TECHNOLOGIES D/B/A ALTERNET
4455 BAYMEADOWS ROAD
JACKSONVILLE, FL 32217
904~448-3390

BILL WIGINTON HYPERION TELECOMM. BOYCE PLAZA III 2570 BOYCE PLAZA ROAD PITTSBURGH, PA 15241 412-221-1888

SUE E. WEISKE TIME WARNER COMM. 160 INVERNESS DRIVE WEST ENGLEWOOD, CO 80112

Nancy & White (sa)

1		REBUTTAL TESTIMONY OF ANIRUDDHA (ANDY) BANERJEE
2		ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS, INC.
3		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4		DOCKET NO. 950984B-TP (MCImetro PETITION),
5		DECEMBER 11, 1995
6		
7		
8		
9	Q.	Please state your name, address, and place of
10		employment.
11		
12	A.	My name is Aniruddha (Andy) Banerjee. I am a
13		Senior Consultant with National Economic Research
14		Associates, Inc., located at One Main Street,
15		Cambridge, MA 02142.
16		
17	Q.	Please give a brief description of your background
18		and experience.
19		
20	A.	I earned a Bachelor of Arts (with Honors) and a
21		Master of Arts degree in Economics from the
22		University of Delhi, India, in 1975 and 1977
23		respectively. I received a Ph.D. in Agricultural
24		Economics from the Pennsylvania State University in
25		1985. I have over eight years of experience

- teaching undergraduate and graduate courses in 1
- various fields of Economics, and have conducted 2 academic research that has led to publications and 3
- conference presentations. 5
- 6 Since 1988, I have held various positions in the telecommunications industry. Prior to my present
- position, I have been an economist in the Market 8 Analysis & Forecasting Division at AT&T 9
- Communications in Bedminster, NJ, a Member of 10
- Technical Staff at Bell Communications Research in 11 Livingston, NJ, and a Research Economist at 12
- 13 BellSouth Telecommunications in Birmingham, AL. In these positions, I was responsible for conducting 14
- economic and market analysis, building quantitative 15 demand models for telecommunication services, 16
- developing economic positions and strategies, and 17 providing expert testimony support on regulatory 18
- economic matters. In my present capacity, I 19 provide quantitative and policy analysis for 20
- telecommunications industry clients principally on 21 matters of concern to local exchange carriers. 22
- 23 Have you previously filed testimony before this 24 0.

25

Commission?

1

2 A.

Yes.

Docket?

3

5

6 7 Q.

8 9

10 A. 11

12 13

14 15

16 17 Q.

18 19

20

21

22 A.

23 24

25

November 27, 1995 and filed with the Florida Public

by MCImetro on November 14, 1995?

3

I filed on behalf of BellSouth

Telecommunications, Inc., direct and rebuttal

What is the purpose of your testimony in this

testimony in Docket 950985-TP and direct testimony

in 950984A-TP and direct testimony in 950984B-TP.

The purpose of my testimony is to respond to and,

where necessary, show why the positions taken by

some of the parties are inconsistent with sound

economic principles. In particular, it addresses

their prescriptions for the pricing of unbundled

Did the parties raise any additional issues you

need to address in their direct testimony filed on

November 28, 1995 in response to the Petition filed

In fact, most simply adopted their previously

filed testimony by reference; therefore, I adopt by

reference and incorporate my direct testimony dated

network services by BellSouth. [Issue # 3]

1		serv.	rce co	DIMINITESTON	TH DO	JCKEL	9309647
2							
3	Q.	Does	this	conclude	your	testi	mony?
4							
5	A.	Yes.					
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
0.4							