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December 15, 1999

Ms. Blanco Bayo, Director
Division of Records and Reporting
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via Hand Delivery

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59 DEC 15 PM 12: 23
RECORDS AND REPORTING

Re: Petition of BellSouth Telecommunications, Inc. for Arbitration of the Interconnection Agreement Between Time Warner Telecom of Florida, L.P., pursuant to Section 252 (b) of the Telecommunications Act of 1996 -- Docket No. 991605 -TP

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of the Direct Testimony and Exhibit of Don J. Wood on behalf of Time Warner Telecom of Florida, L.P. for the above-referenced docket. You will also find a copy of this letter enclosed. Please date-stamp this copy to indicate that the original was filed and return a copy to me.

If you have any questions regarding this matter, please feel free to contact me. Thank you for your assistance in processing this filing.

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.

Karen M. Camechis
Karen M. Camechis

- AFA _____
- APP _____
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cc: All Parties of Record (w/ enclosure)

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FPSC-BUREAU OF RECORDS 5302 DEC 15 99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 991605-TP

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been served by U.S. Mail on this 15th day of December, 1999, to the following parties of record:

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Phone: (850) 224-7798
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Time Warner Telecom of Florida, L.P.
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Franklin, TN 37069
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KAREN M. CAMECHIS, ESQ.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition of BellSouth
Telecommunications, Inc. for
arbitration of interconnection
agreement with Time Warner
Telecom of Florida, L.P.,
pursuant to Section 252(b) of the
Telecommunications Act of 1996.**)
_____)

Docket No. 991605-TP

Filed December 15, 1999

DIRECT TESTIMONY

AND EXHIBIT

OF

DON J. WOOD

ON BEHALF OF

TIME WARNER TELECOM OF FLORIDA, L.P.

DOCUMENT NUMBER-DATE

15302 DEC 15 99

FPSC-RECORDS/REPORTING

1 **TIME WARNER TELECOM OF FLORIDA, L.P.**
2 **DIRECT TESTIMONY OF DON J. WOOD**
3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **DOCKET NO. 991605-TP**
5 **DECEMBER 15, 1999**
6

7 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

8 A. My name is Don J. Wood. My business address is 914 Stream Valley Trail,
9 Alpharetta, Georgia 30022. I am employed as a Regional Director of Klick, Kent,
10 and Allen, Inc., an economic and financial consulting firm. I provide economic and
11 regulatory analysis of the telecommunications, cable, and related convergence
12 industries, with an emphasis on economic policy, development of competitive
13 markets, and cost of service issues.

14

15 Q. PLEASE DESCRIBE YOUR BACKGROUND AND EXPERIENCE.

16 A. I received a BBA in Finance with distinction from Emory University and an MBA
17 with concentrations in Finance and Microeconomics from the College of William and
18 Mary. My telecommunications experience includes employment at both a Regional
19 Bell Operating Company ("RBOC") and an Interexchange Carrier ("IXC").

20 I was employed in the local exchange industry by BellSouth Services, Inc. in
21 its Pricing and Economics, Service Cost Division. My responsibilities included
22 performing cost analyses of new and existing services, preparing documentation for
23 filings with state regulatory commissions and the Federal Communications
24 Commission ("FCC"), developing methodology and computer models for use by
25 other analysts, and performing special assembly cost studies. I was also employed in
26 the interexchange industry by MCI Telecommunications Corporation, as Manager of

1 Regulatory Analysis for the Southern Division. In this capacity I was responsible for
2 the development and implementation of regulatory policy for operations in the
3 southern United States. I then served as a Manager in the Economic Analysis and
4 Regulatory Affairs Organization, where I participated in the development of
5 regulatory policy for national issues.

6

7 Q. HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE STATE
8 REGULATORS?

9 A. Yes. I have testified on telecommunications issues before the regulatory
10 commissions of twenty-six states, Puerto Rico, and the District of Columbia. I have
11 also presented testimony regarding telecommunications and cost of service issues in
12 state and federal courts and have presented comments to the FCC. A listing of my
13 previous testimony is attached as Exhibit ___(DJW-1).

14

15 Q. HAVE YOU PREVIOUSLY APPEARED BEFORE THIS COMMISSION?

16 A. Yes. I have testified or offered testimony in several proceedings over the past
17 several years, including the AT&T and MCI arbitrations with BellSouth (Docket
18 Nos. 960846-TP and 960833-TP) and GTE (Docket Nos. 960847-TP and 960980-
19 TP) and MCI's arbitration with Sprint United (Docket No. 961230-TP), proceedings
20 to establish rates for unbundled network elements (further hearings in consolidated
21 Docket Nos. 960833-TP, 960846-TP, 960757-TP, and 971140-TP), and the
22 proceeding established to determine a methodology for calculating the cost of
23 universal service (Docket No. 980696-TP).

24

1 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2 A. I have been asked by Time Warner Telecom of Florida, L.P. ("Time Warner") to
3 provide a discussion of the issue that currently remains outstanding in its
4 negotiations with BellSouth Telecommunications, Inc. ("BellSouth"). BellSouth has
5 filed for Commission arbitration of the following issue: What should be the
6 appropriate definition of "local traffic" for purposes of the parties' reciprocal
7 compensation obligations under Section 251(b)(5) of the 1996 Act? BellSouth's
8 position seeks to "expressly exclude" calls made to Internet Service providers
9 ("ISPs"). In contrast, Time Warner's position is that calls to ISPs should not be
10 segregated out and excluded but instead should continue to be treated as local traffic
11 for the purposes of reciprocal compensation. For each of the reasons outlined
12 below, I believe that Time Warner's position should be adopted.

13

14 Q. PLEASE SUMMARIZE THE CONCLUSIONS OF YOUR TESTIMONY.

15 A. Although a multitude of complex legal and technical arguments have been made both
16 in support of, and in opposition to, requiring reciprocal compensation payments for
17 traffic directed to ISPs, it is simply good public policy and economically rational to
18 require payment for the termination of this traffic. Ultimately, the further
19 development of competition for local exchange service in Florida will depend on the
20 successful resolution of this and any similar future disputes in a manner that is both
21 fair and procompetitive.

22 Q. HAS THE COMMISSION RECENTLY REACHED CONCLUSIONS THAT ARE
23 CONSISTENT WITH YOUR RECOMMENDATIONS IN THIS PROCEEDING?

1 A. Yes. In Docket No. 990149-TP, the Commission addressed an essentially identical
2 dispute between BellSouth and MediaOne Florida Telecommunications, Inc. In its
3 Order, the Commission concluded that the existing rate should be continued on a
4 going-forward basis. There is no reason for reaching a different result in this case.
5 More recently, Commission Staff issued its recommendation in Docket No. 990691-
6 TP, an arbitration between BellSouth and ICG Telecom Group, Inc. ("ICG"), in
7 response to the following issue:

8 Until the FCC and the FPSC adopt a rule with prospective
9 application, should dial-up access to the Internet through Internet
10 Service Providers (ISPs) be treated as if it were a local call for
11 purposes of reciprocal compensation?
12

13 The Staff's primary recommendation is as follows:

14 Yes. Until the FCC and the FPSC adopt a rule with prospective
15 application, dial-up access to the Internet through Internet Service
16 Providers (ISPs) should be treated as if it were a local call for
17 purposes of reciprocal compensation.
18

19 The Staff also set forth the following alternative recommendation:

20 Staff recommends that the parties should continue to operate under
21 the terms of their current contract until the FCC issues its final ruling
22 on whether reciprocal compensation is due for ISP-bound traffic
23 because the FCC has retained jurisdiction over this traffic.
24

25 Time Warner is simply asking the Commission to conclude, as it did in Docket No.
26 990149-TP and as the Staff has done in Docket No. 990691-TP, that the existing
27 reciprocal compensation rate should continue to be applied, and that calls that
28 happen to be made to ISPs should not be excluded from the reciprocal compensation
29 mechanism that has been established for local calls.

1

2 Q. ARE THE PARTIES IN DISAGREEMENT REGARDING SPECIFIC
3 LANGUAGE WITH RESPECT TO PAYMENTS FOR TERMINATING
4 TRAFFIC TO ISPs?

5 A. Yes. Time Warner does not agree that the proposed language proposed by
6 BellSouth should be adopted. BellSouth seeks to "expressly exclude" from the
7 reciprocal compensation mechanism calls made to ISPs. Time Warner is requesting
8 that the Commission approve an interconnection agreement between Time Warner
9 and BellSouth that excludes the language proposed by BellSouth and that, instead,
10 includes explicit clarifying language that traffic originated on the network of one
11 carrier and delivered to the network of another carrier in order to be directed on to
12 an Internet Service Provider (ISP) is subject to reciprocal compensation payments at
13 the agreed upon rate for the termination of local calls.

14

15 Q. WHY IS THIS ISSUE IMPORTANT TO TIME WARNER?

16 A. This issue is of considerable importance to Time Warner because, as I am informed,
17 Time Warner has been successful in attracting customers requiring advanced
18 technological services, including ISPs, to its network. BellSouth's attempt to
19 exclude these types of local customers from reciprocal compensation obligations
20 unfairly targets Time Warner's customer base and threatens to leave Time Warner in
21 a position of terminating a large number of BellSouth calls without any payment
22 from BellSouth. In essence, Time Warner is being asked to carry large volumes of
23 BellSouth traffic, and to incur the cost of doing so, without an ability to charge
24 BellSouth for this service.

1

2 Q. HAS THE FCC ALREADY ADDRESSED THIS ISSUE AND FOUND THAT
3 CALLS TO ISP'S ARE INTERSTATE CALLS?

4 A. No. The FCC's conclusions are limited in scope with regard to this issue. On
5 February 26, 1999 the FCC released its *Declaratory Ruling in CC Docket No. 96-98*
6 *and Notice of Proposed Rulemaking in CC Docket No. 96-98* (hereafter ISP Order
7). At paragraph 18 of its ISP Order, the FCC states the following:

8 After reviewing the record, we conclude that, although some
9 Internet traffic is intrastate, a substantial portion of Internet
10 traffic involves accessing interstate or foreign websites.

11
12 The FCC's vague description of Internet traffic provides little useful
13 information to the Commission in its attempt to resolve this debate. It is not the
14 ISP's accessing of websites (that may exist in a different state or country) that is at
15 issue, it is the end user's accessing of the ISP (which is within the same local calling
16 area) that is the source of the disagreement between Time Warner and BellSouth.
17 The question that the Commission is being asked to answer in this proceeding relates
18 specifically to a situation in which a BellSouth end user customer places a call to an
19 ISP end user of Time Warner, so that Time Warner must incur the cost of
20 completing the call for BellSouth's customer. The exchange of information between
21 the ISP and remote websites, and any compensation mechanism that might apply for
22 that exchange, is simply not at issue here.

23

24 Q. HAS THE FCC BEEN EXPLICIT THAT ITS CONCLUSIONS IN THE ISP
25 ORDER DO NOT SUPPORT BELLSOUTH'S PROPOSED LANGUAGE
26 EXCLUDING ISP TRAFFIC FROM RECIPROCAL COMPENSATION?

1 A. Yes. Included in the same ISP Order, at paragraph 20, the FCC includes the
2 following language:

3 Our determination that at least a substantial portion of dial-up ISP-
4 bound traffic is interstate does not, however, alter the current ESP
5 exemption. ESPs, including ISPs, continue to be entitled to purchase
6 their PSTN links through intrastate (local) tariffs rather than through
7 interstate access tariffs. Nor, as we discuss below, is it dispositive of
8 interconnection disputes currently before state commissions.
9 [emphasis added, footnotes removed]

10 The FCC also included the following additional language at paragraph 25
11 meant to ensure that state commissions are not misled into believing that the FCC
12 has pre-empted their ability to require compensation for ISP traffic within an
13 arbitration proceeding, regardless of whether the traffic is considered to be intra or
14 interstate in nature:

15 Even where parties to interconnection agreements do not voluntarily
16 agree on an inter-carrier compensation mechanism for ISP-bound
17 traffic, state commissions nonetheless may determine in their
18 arbitration proceedings at this point that reciprocal compensation
19 should be paid for this traffic. The passage of the 1996 Act raised the
20 novel issue of the applicability of its local competition provisions to
21 the issue of inter-carrier compensation for ISP-bound traffic. Section
22 252 imposes upon state commissions the statutory duty to approve
23 voluntarily-negotiated interconnection agreements and to arbitrate
24 interconnection disputes. As we observed in the Local Competition
25 Order, state commission authority over interconnection agreements
26 pursuant to section 252 extends to both interstate and intrastate
27 matters. Thus the mere fact that ISP-bound traffic is largely
28 interstate does not necessarily remove it from section 251/252
29 negotiation and arbitration process. However, any such arbitration
30 must be consistent with governing federal law. While to date the
31 Commission has not adopted a specific rule governing the matter, we
32 do note that our policy of treating ISP-bound traffic as local for
33 purposes of interstate access charges would, if applied in the separate
34 context of reciprocal compensation, suggest that such compensation
35 is due for that traffic.

36
37 [emphasis added, footnotes removed]

1

2 Q. IF THE FCC HAS NOT DECIDED THE ISSUE OF WHETHER ISP-BOUND
3 TRAFFIC SHOULD BE SUBJECT TO RECIPROCAL COMPENSATION, AND
4 IF IT IS THE STATE COMMISSIONS' RESPONSIBILITY TO DO SO, UPON
5 WHAT BASIS SHOULD A STATE COMMISSION MAKE SUCH A FINDING?

6 A. First, the Commission should take special note of the following language taken
7 directly from paragraph 25 of the FCC's ISP Order:

8 While to date the Commission has not adopted a specific rule
9 governing the matter, we do note that our policy of treating ISP-
10 bound traffic as local for purposes of interstate access charges would,
11 if applied in the separate context of reciprocal compensation, suggest
12 that such compensation is due for that traffic.
13

14 In this paragraph, the FCC makes it clear that a state Commission may find
15 that compensation is due for these calls, and in fact appears to be encouraging them
16 to make findings consistent with a policy of treating ISP-bound traffic as local for
17 purposes of inter-company compensation.

18 Second, as a general matter any interim mechanism should approximate, to
19 the extent possible, a reasonable expectation of how the permanent mechanism will
20 operate. The FCC has not yet issued an order setting forth a rule for the treatment
21 of this traffic, although it has made it clear that it will do so. The statement by the
22 FCC that "our policy of treating ISP-bound traffic as local for purposes of interstate
23 access charges would, if applied in the separate context of reciprocal compensation,
24 suggests that such compensation is due for that traffic" is the best indication to date
25 of what the FCC's conclusion will be. In setting an interim mechanism for the calls
26 in dispute in this proceeding, it simply makes sense for this Commission to reach a
27 conclusion that is consistent with this statement by the FCC.

1 Third, the Commission, as always, should rely upon sound public policy and
2 economic reasoning to find that ISP-bound traffic should be subject to reciprocal
3 compensation obligations. The Commission should keep in mind that its decisions in
4 this regard will have substantial impact on the "internet" and information services
5 marketplace and the investment required to realize the potential of electronic
6 communication and commerce as a whole.

7

8 Q. PLEASE EXPLAIN WHY SOUND PUBLIC POLICY AND ECONOMIC
9 REASONING SUPPORT RECIPROCAL COMPENSATION PAYMENTS FOR
10 ISP-BOUND TRAFFIC.

11 A. A listing of the public policy and economic rationale that support requiring
12 reciprocal compensation payments for ISP bound traffic is as follows:

13 (a) Despite complex legal arguments and historical definitions, the simple
14 fact remains that calls directed to ISPs are functionally identical to local voice calls
15 for which BellSouth agrees to pay termination charges. Applying different
16 termination rates or, even worse, compensating a carrier for one type of call and not
17 for the other, will generate inaccurate economic signals in the marketplace, the result
18 of which will drive firms away from serving ISPs. This result could have a dire
19 impact on the growing electronic communication and commerce markets.

20 (b) ISP providers are an important market segment for CLECs and
21 eliminating a CLEC's ability to recover its costs associated with serving them is
22 likely to distort one of the only local exchange market segments that appears to be
23 well on its way toward effective competition. ISPs have been drawn to CLECs like
24 Time Warner because these CLECs, unlike incumbent carriers (ILECs) such as

1 BellSouth, have been willing to meet their unique service needs. Allowing ILECs to
2 direct calls to the ISPs by using the CLEC network without compensating them for
3 its use, penalizes the CLEC for attracting customers *via* innovative and customer
4 service focused products.

5 (c) Requiring carriers to pay reciprocal compensation rates for the
6 termination of ISP-bound traffic is economically efficient. Because termination rates
7 are based on their underlying costs, BellSouth should be economically indifferent as
8 to whether it incurs the cost to terminate the call on its own network or whether it
9 incurs that cost through a reciprocal compensation rate paid to Time Warner. The
10 fact that BellSouth is not economically indifferent can only stem from its incentive to
11 impede Time Warner's entry into the marketplace rather than to be as efficient as
12 possible in terminating its traffic.

13 (d) Because BellSouth is required to pay, as well as receive, symmetrical
14 compensation for local exchange traffic based upon its own reported costs, its
15 payments to other carriers in this regard are an important check on BellSouth's cost
16 studies used to establish rates for the termination of traffic. Unless BellSouth is
17 required to pay the costs that it itself has established *via* its own cost studies, it has
18 every incentive to over-estimate those costs for purposes of raising barriers to
19 competitive entry. By removing large traffic volume categories such as ISP-bound
20 traffic from BellSouth's obligation to pay terminating costs, the Commission would
21 be removing an important disciplining factor associated with ensuring that
22 BellSouth's reported termination costs are reasonable.

23

1 Q. PLEASE EXPLAIN IN GREATER DETAIL YOUR CONTENTION THAT
2 CALLS DIRECTED TO ISPs ARE FUNCTIONALLY IDENTICAL TO LOCAL
3 VOICE CALLS FOR WHICH BELL SOUTH HAS AGREED TO PAY
4 TERMINATION CHARGES.

5 A. A ten minute call originated on the BellSouth network and directed to the Time
6 Warner network travels exactly the same path, requires the use of exactly the same
7 facilities and generates exactly the same level of cost regardless of whether that call
8 is dialed to a Time Warner local residential customer or to an ISP provider.

9 Regardless of whether the originating customer dials either the Time Warner
10 residential customer or the Time Warner ISP customer, the call travels from the
11 originating customer's premises to the BellSouth central office switch, which then
12 routes the call to the BellSouth/Time Warner interconnection point and ultimately to
13 the Time Warner switch. From the Time Warner switch the call is then transported
14 to either the residential customer or the ISP customer depending upon the number
15 dialed by the BellSouth caller. Both calls use the same path and exactly the same
16 equipment to reach their destinations. Most importantly, the costs to terminate the
17 calls made to the residential customer and the ISP customer are identical. As such,
18 the rates associated with recovering those costs should be identical. To single out
19 the ISP call and suggest that \$0 compensation should be paid for purposes of
20 carrying that particular call and some other, non-zero rate should be applied to all
21 other calls ignores the simple economic reality that both calls generate equal costs
22 that must be recovered by the reciprocal compensation rate paid for their transport
23 and completion.

24

1 Q. YOU STATED THAT THE FURTHER DEVELOPMENT OF COMPETITION
2 FOR LOCAL EXCHANGE SERVICE IN FLORIDA WILL DEPEND ON THE
3 SUCCESSFUL RESOLUTION OF THIS AND ANY SIMILAR FUTURE
4 DISPUTES IN A MANNER THAT IS BOTH FAIR AND PROCOMPETITIVE.
5 WHY IS THE TIMELY RESOLUTION OF THIS TYPE OF DISPUTE SO
6 IMPORTANT?

7 A. The Telecommunications Act of 1996 requires that a form of mutual and reciprocal
8 compensation be developed for the completion of local calls originated by an end
9 user customer of one local exchange carrier and terminated to an end used customer
10 of another carrier. This interconnection of networks means that all local exchange
11 carriers will at times be incurring the cost of completing a call originated by a
12 customer of another carrier. A means of mutual and reciprocal compensation, as
13 defined in § 252 (d)(1) and (2) of the Act and implemented through interconnection
14 agreements entered into between carriers, is intended to ensure that each carrier is
15 compensated for the costs associated with completing these calls.

16 The importance of a mutual and reciprocal compensation mechanism to the
17 successful development of competition for local exchange services is illustrated by
18 the frequency with which this issue has been extensively negotiated and ultimately
19 arbitrated pursuant to Section 252 of the Act. Over the past three years, I have
20 participated in 32 such arbitrations on behalf of new entrants. In each of these
21 arbitrations, the compensation mechanism for interconnection and call completion
22 was at issue. The willingness of new entrants to commit the resources necessary to
23 pursue the process of lengthy negotiations and arbitrations, and their willingness to
24 delay their entry into the local exchange markets until the arbitration process was

1 completed, is a clear indication of the importance of these interconnection-related
2 rates to the success of these carriers.

3 Clearly, any carrier that can avoid paying compensation to other carriers for
4 the completion of local calls originated by its end user customers will have a
5 competitive advantage. If the carrier avoiding payment of compensation is an
6 incumbent local exchange company such as BellSouth, this anticompetitive impact is
7 compounded. The incumbent carrier benefits from disputes regarding the terms of
8 interconnection agreements (including but not limited to mutual and reciprocal
9 compensation arrangements): while the dispute awaits resolution, the CLEC is
10 completing calls originated by BellSouth end user customers without compensation.
11 These funds could have been invested in efforts to further expand the CLEC's
12 market share for local exchange services. Over time, the uncertainty and logistical
13 difficulties created by this and similar disputes can have a detrimental effect on the
14 efforts of Time Warner and other competitive local exchange providers to enter the
15 market and expand. Finally, the costs incurred by Time Warner and other
16 competitive local exchange providers to engage in the litigation necessary to resolve
17 this type of dispute artificially inflates the cost of competitive entry and creates
18 unnecessary delay. Therefore, not only does this type of dispute have obvious
19 detrimental effects on competitive local exchange providers (and ultimately Florida
20 consumers of local exchange services), it is clearly beneficial to an incumbent carrier
21 such as BellSouth. Because of the stakes involved, it is extremely important that the
22 Commission consider this and similar disputes within this context.

23 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

24 A. Yes.

Vita of Don J. Wood

914 Stream Valley Trail, Alpharetta, Georgia 30022 ■ 770.475.9971, FAX 770.475.9972

EDUCATION

Emory University, Atlanta, Ga.
BBA in Finance, with Distinction.

College of William and Mary, Williamsburg, Va.
MBA, with concentrations in Finance and Microeconomics.

CURRENT EMPLOYMENT

Don J. Wood is a Regional Director in the firm of Klick, Kent, and Allen/FTI Consulting, Inc. He provides economic and regulatory analysis services in telecommunications, cable, and related "convergence" industries, specializing in economic policy related to the development of competitive markets and cost of service issues. Mr. Wood was a founding partner of the firm of Wood & Wood, and has been employed in a management capacity at a major Local Exchange Company and an Interexchange Carrier. In each capacity he has been directly involved in both the development and implementation of regulatory policy. The subject matter of his testimony has ranged from broad policy issues to detailed cost analysis. Mr. Wood has presented testimony before the administrative regulatory bodies of twenty-six states, the District of Columbia, and Puerto Rico. He has also presented testimony in State and Federal courts and has prepared comments for filing with the Federal Communications Commission.

PREVIOUS INDUSTRY EMPLOYMENT

Wood & Wood

Founding Principal.

BellSouth Services, Inc.

Staff Manager.

MCI Telecommunications Corporation

Manager of Regulatory Analysis, Southeast Division.

Manager, Corporate Economic Analysis and Regulatory Affairs.

TESTIMONY - STATE REGULATORY COMMISSIONS:

Alabama Public Service Commission

Docket No. 19356, Phase III: Alabama Public Service Commission vs. All Telephone Companies Operating in Alabama, and Docket 21455: AT&T Communications of the South Central States, Inc., Applicant, Application for a Certificate of Public Convenience and Necessity to Provide Limited IntraLATA Telecommunications Service in the State of Alabama.

Docket No. 20895: In Re: Petition for Approval to Introduce Business Line Termination for MCI's 800 Service.

Docket No. 21071: In Re: Petition by South Central Bell for Introduction of Bidirectional Measured Service.

Docket No. 21067: In Re: Petition by South Central Bell to Offer Dial Back-Up Service and 2400 BPS Central Office Data Set for Use with PulseLink Public Packet Switching Network Service.

Docket No. 21378: In Re: Petition by South Central Bell for Approval of Tariff Revisions to Restructure ESSX and Digital ESSX Service.

Docket No. 21865: In Re: Petition by South Central Bell for Approval of Tariff Revisions to Introduce Network Services to be Offered as a Part of Open Network Architecture.

Docket No. 25703: In Re: In the Matter of the Interconnection Agreement Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. 25704: In Re: Petition by AT&T Communications of the South Central States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Agreement with GTE South Incorporated and CONTEL of the South, Inc. Concerning Interconnection and Resale under the Telecommunications Act of 1996.

Docket No. 25835: In Re: Petition for Approval of a Statement of Generally Available Terms and Conditions Pursuant to §252(f) of the Telecommunications Act of 1996 and Notification of Intention to File a §271 Petition for In-Region InterLATA Authority with the Federal Communications Commission Pursuant to the Telecommunications Act of 1996.

Docket No. 26029: In Re: Generic Proceeding - Consideration of TELRIC Studies.

Docket No. 25980: Implementation of the Universal Support Requirements of Section 254 of the Telecommunications Act of 1996.

Arkansas Public Service Commission

Docket No. 92-337-R: In the Matter of the Application for a Rule Limiting Collocation for Special Access to Virtual or Physical Collocation at the Option of the Local Exchange Carrier.

Public Utilities Commission of the State of Colorado

Docket No. 96A-345T: In the Matter of the Interconnection Contract Negotiations Between AT&T Communications of the Mountain States, Inc., and US West Communications, Inc., Pursuant to 47 U.S.C. Section 252. Docket No. 96A-366T: In the Matter of the Petition of MCIMetro Access Transmission Services, Inc., for Arbitration Pursuant to 47 U.S.C. § 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with US West Communications, Inc. (consolidated).

Docket No. 96S-257T: In Re: The Investigation and Suspension of Tariff Sheets Filed by US West Communications, Inc., with Advice Letter No. 2608 Regarding Proposed Rate Changes.

Docket No. 98F-146T: Colorado Payphone Association, Complainant, v. US West Communications, Inc., Respondent.

State of Connecticut, Department of Utility Control

Docket 91-12-19: DPUC Review of Intrastate Telecommunications Services Open to Competition (Comments).

Docket No. 94-07-02: Development of the Assumptions, Tests, Analysis, and Review to Govern Telecommunications Service Reclassifications in Light of the Eight Criteria Set Forth in Section 6 of Public Act 94-83 (Comments).

Delaware Public Service Commission

Docket No. 93-31T: In the Matter of the Application of The Diamond State Telephone Company for Establishment of Rules and Rates for the Provision of IntelliLinQ-PRI and IntelliLinQ-BRI.

Docket No. 41: In the Matter of the Development of Regulations for the Implementation of the Telecommunications Technology Investment Act.

Florida Public Service Commission

Docket No. 881257-TL: In Re: Proposed Tariff by Southern Bell to Introduce New Features for Digital ESSX Service, and to Provide Structural Changes for both ESSX Service and Digital ESSX Service.

Docket No. 880812-TP: In Re: Investigation into Equal Access Exchange Areas (EAEAs), Toll Monopoly Areas (TMAs), 1+ Restriction to the Local Exchange Companies (LECs), and Elimination of the Access Discount.

Docket No. 890183-TL: In Re: Generic Investigation into the Operations of Alternate Access Vendors.

Docket No. 870347-TI: In Re: Petition of AT&T Communications of the Southern States for Commission Forbearance from Earnings Regulation and Waiver of Rule 25-4.495(1) and 25-24.480 (1) (b), F.A.C., for a trial period.

Docket No. 900708-TL: In Re: Investigation of Methodology to Account for Access Charges in Local Exchange Company (LEC) Toll Pricing.

Docket No. 900633-TL: In Re: Development of Local Exchange Company Cost of Service Study

Methodology.

Docket No. 910757-TP: In Re: Investigation into the Regulatory Safeguards Required to Prevent Cross-Subsidization by Telephone Companies.

Docket No. 920260-TL: In Re: Petition of Southern Bell Telephone and Telegraph Company for Rate Stabilization, Implementation Orders, and Other Relief.

Docket No. 950985-TP: In Re: Resolution of Petitions to establish 1995 rates, terms, and conditions for interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes.

Docket No. 960846-TP: In Re: Petition by MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. for Arbitration of Certain Terms and Conditions of a proposed agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 and Docket No. 960833-TP: In Re: Petition by AT&T Communications of the Southern States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 (consolidated).

Docket No. 960847-TP and 960980-TP: In Re: Petition by AT&T Communications of the Southern States, Inc., MCI Telecommunications Corporation, MCI Metro Access Transmission Service, Inc., for Arbitration of Certain Terms and Conditions of a Proposed Agreement with GTE Florida Incorporated Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 (consolidated).

Docket No. 961230-TP: In Re: Petition by MCI Telecommunications Corporation for Arbitration with United Telephone Company of Florida and Central Telephone Company of Florida Concerning Interconnection Rates, Terms, and Conditions, Pursuant to the Federal Telecommunications Act of 1996.

Docket No. 960786-TL: In Re: Consideration of BellSouth Telecommunications, Inc.'s Entry Into InterLATA Services Pursuant to Section 271 of the Federal Telecommunications Act of 1996.

Docket Nos. 960833-TP, 960846-TP, 960757-TP, and 971140-TP: Investigation to develop permanent rates for certain unbundled network elements.

Docket No. 980696-TP: In Re: Determination of the cost of basic local telecommunications service, pursuant to Section 364.025 Florida Statutes.

Docket No. 990750-TP: Petition by ITC^DeltaCom Communications, Inc., d/b/a/ ITC^DeltaCom, for arbitration of certain unresolved issues in interconnection negotiations between ITC^DeltaCom and BellSouth Telecommunications, Inc.

Georgia Public Service Commission

Docket No. 3882-U: In Re: Investigation into Incentive Telephone Regulation in Georgia.

Docket No. 3883-U: In Re: Investigation into the Level and Structure of Intrastate Access Charges.

Docket No. 3921-U: In Re: Compliance and Implementation of Senate Bill 524.

Docket No. 3905-U: In Re: Southern Bell Rule Nisi.

Docket No. 3995-U: In Re: IntraLATA Toll Competition.

Docket No. 4018-U: In Re: Review of Open Network Architecture (ONA) (Comments).

Docket No. 5258-U: In Re: Petition of BellSouth Telecommunications for Consideration and Approval of its "Georgians FIRST" (Price Caps) Proposal.

Docket No. 5825-U: In Re: The Creation of a Universal Access Fund as Required by the Telecommunications Competition and Development Act of 1995.

Docket No. 6801-U: In Re: Interconnection Negotiations Between BellSouth Telecommunications, Inc. and AT&T Communications of the Southern States, Inc., Pursuant to Sections 251-252 and 271 of the Telecommunications Act of 1996.

Docket No. 6865-U: In Re: Petition by MCI for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996.

Docket No. 7253-U: In Re: BellSouth Telecommunications, Inc.'s Statement of Generally Available Terms and Conditions Under Section 252 (f) of the Telecommunications Act of 1996.

Docket No. 7061-U: In Re: Review of Cost Studies and Methodologies for Interconnection and Unbundling of BellSouth Telecommunications Services.

Docket No. 10692-U: In Re: Generic Proceeding to Establish Long-Term Pricing Policies for Unbundled Network Elements.

Docket No. 10854-U: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996

Iowa Utilities Board

Docket No. RPU-95-10.

Docket No. RPU-95-11.

Kentucky Public Service Commission

Administrative Case No. 10321: In the Matter of the Tariff Filing of South Central Bell Telephone Company to Establish and Offer Pulselink Service.

Administrative Case No. 323: In the Matter of An Inquiry into IntraLATA Toll Competition, An Appropriate Compensation Scheme for Completion of IntraLATA Calls by Interexchange Carriers, and WATS Jurisdictionality.

- Phase IA: Determination of whether intraLATA toll competition is in the public interest.

- Phase IB: Determination of a method of implementing intraLATA competition.
- Rehearing on issue of Imputation.

Administrative Case No. 90-256, Phase II: In the Matter of A Review of the Rates and Charges and Incentive Regulation Plan of South Central Bell Telephone Company.

Administrative Case No. 336: In the Matter of an Investigation into the Elimination of Switched Access Service Discounts and Adoption of Time of Day Switch Access Service Rates.

Administrative Case No. 91-250: In the Matter of South Central Bell Telephone Company's Proposed Area Calling Service Tariff.

Administrative Case No. 96-431: In Re: Petition by MCI for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996.

Administrative Case No. 96-478: In Re: The Petition by AT&T Communications of the South Central States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Agreement with GTE South Incorporated Concerning Interconnection and Resale Under the Telecommunications Act of 1996.

Administrative Case No. 96-482: In Re: The Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Administrative Case No. 360: In the Matter of: An Inquiry Into Universal Service and Funding Issues.

Administrative Case No. 96-608: In the Matter of: Investigation Concerning the Provision of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Louisiana Public Service Commission

Docket No. 17970: In Re: Investigation of the Revenue Requirements, Rate Structures, Charges, Services, Rate of Return, and Construction Program of AT&T Communications of the South Central States, Inc., in its Louisiana Operations.

Docket No. U-17949: In the Matter of an Investigation of the Revenue Requirements, Rate Structures, Charges, Services, Rate of Return, and Construction Program of South Central Bell Telephone Company, Its Louisiana Intrastate Operations, The Appropriate Level of Access Charges, and All Matters Relevant to the Rates and Service Rendered by the Company.

- Subdocket A (SCB Earnings Phase)
- Subdocket B (Generic Competition Phase)

Docket No. 18913-U: In Re: South Central Bell's Request for Approval of Tariff Revisions to Restructure ESSX and Digital ESSX Service.

Docket No. U-18851: In Re: Petition for Elimination of Disparity in Access Tariff Rates.

Docket No. U-22022: In Re: Review and Consideration of BellSouth Telecommunications, Inc.'s TSLRIC and LRIC Cost Studies Submitted Pursuant to Sections 901(C) and 1001(E) of the Regulations for Competition in the Local Telecommunications Market as Adopted by General Order Dated March 15, 1996 in Order to Determine the Cost of Interconnection Services and Unbundled Network Components to Establish Reasonable, Non-Discriminatory, Cost Based Tariffed Rates and Docket No. U-22093: In Re: Review and Consideration of BellSouth Telecommunications, Inc.'s Tariff Filing of April 1, 1996, Filed Pursuant to Section 901 and 1001 of the Regulations for Competition in the Local Telecommunications Market Which Tariff Introduces Interconnection and Unbundled Services and Establishes the Rates, Terms and Conditions for Such Service Offerings (consolidated).

Docket No. U-22145: In the Matter of Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. U-22252: In Re: Consideration and Review of BST's Preapplication Compliance with Section 271 of the Telecommunications Act of 1996, including but not limited to the fourteen requirements set forth in Section 271 (c) (2) (b) in order to verify compliance with section 271 and provide a recommendation to the FCC regarding BST's application to provide interLATA services originating in-region.

Docket No. U-20883 Subdocket A: In Re: Submission of the Louisiana Public Service Commission's Forward Looking Cost Study to the FCC for Purposes of Calculating Federal Universal Service Support.

Docket No. U-24206: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Public Service Commission of Maryland

Case 8584, Phase II: In the Matter of the Application of MFS Intelenet of Maryland, Inc. for Authority to Provide and Resell Local Exchange and Intrastate Telecommunications Services in Areas Served by C&P Telephone Company of Maryland.

Case 8715: In the Matter of the Inquiry into Alternative Forms of Regulating Telephone Companies.

Case 8731: In the Matter of the Petitions for Approval of Agreements and Arbitration of Unresolved Issues Arising Under Section 252 of the Telecommunications Act of 1996.

Massachusetts Department of Telecommunications and Energy

D.P.U./D.T.E. 97088/97-18 (Phase II): Investigation by the Department of Telecommunications & Energy on its own motion regarding (1) implementation of section 276 of the Telecommunications Act of 1996 relative to public interest payphones, (2) Entry and Exit Barriers for the Payphone Marketplace, (3) New England Telephone and Telegraph Company d/b/a NYNEX's Public Access Smart-Pay Service, and (4) the rate policy for operator service providers.

Mississippi Public Service Commission

Docket No. U-5086: In Re: MCI Telecommunications Corporation's Metered Use Service Option D (Prism I) and Option E (Prism II).

Docket No. U-5112: In Re: MCI Telecommunications Corporation's Metered Use Option H (800 Service).

Docket No. U-5318: In Re: Petition of MCI for Approval of MCI's Provision of Service to a Specific Commercial Banking Customers for Intrastate Interexchange Telecommunications Service.

Docket 89-UN-5453: In Re: Notice and Application of South Central Bell Telephone Company for Adoption and Implementation of a Rate Stabilization Plan for its Mississippi Operations.

Docket No. 90-UA-0280: In Re: Order of the Mississippi Public Service Commission Initiating Hearings Concerning (1) IntraLATA Competition in the Telecommunications Industry and (2) Payment of Compensation by Interexchange Carriers and Resellers to Local Exchange Companies in Addition to Access Charges.

Docket No. 92-UA-0227: In Re: Order Implementing IntraLATA Competition.

Docket No. 96-AD-0559: In Re: In the Matter of the Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. 98-AD-035: Universal Service.

Docket No. 97-AD-544: In Re: Generic Proceeding to Establish Permanent Prices for BellSouth Interconnection and Unbundled Network Elements.

Nebraska Public Service Commission

Docket No. C-1385: In the Matter of a Petition for Arbitration of an Interconnection Agreement Between AT&T Communications of the Midwest, Inc., and US West Communications, Inc.

New York Public Service Commission

Case No. 28425: Proceeding on Motion of the Commission as to the Impact of the Modification of Final Judgment and the Federal Communications Commission's Docket 78-72 on the Provision of Toll Service in New York State.

North Carolina Public Utilities Commission

Docket No. P-100, Sub 72: In the Matter of the Petition of AT&T to Amend Commission Rules Governing Regulation of Interexchange Carriers (Comments).

Docket No. P-141, Sub 19: In the Matter of the Application of MCI Telecommunications Corporation to Provide InterLATA Facilities-Based Telecommunications Services (Comments).

Docket No. P-55, Sub 1013: In the Matter of Application of BellSouth Telecommunications, Inc. for, and

Election of, Price Regulation.

Docket Nos. P-7, Sub 825 and P-10, Sub 479: In the Matter of Petition of Carolina Telephone and Telegraph and Central Telephone Company for Approval of a Price Regulation Plan Pursuant to G.S. 62-133.5.

Docket No. P-19, Sub 277: In the Matter of Application of GTE South Incorporated for and Election of, Price Regulation.

Docket No. P-141, Sub 29: In the Matter of: Petition of MCI Telecommunications Corporation for Arbitration of Interconnection with BellSouth Telecommunications, Inc., Petition of AT&T Communications of the Southern States, Inc. for Arbitration of Interconnection with BellSouth Telecommunications, Inc. (consolidated).

Docket No. P-141, Sub 30: In the Matter of: Petition of MCI Telecommunications Corporation for Arbitration of Interconnection with General Telephone Company of North Carolina, Inc., Petition of AT&T Communications of the Southern States, Inc. for Arbitration of Interconnection with General Telephone Company of North Carolina, Inc. (consolidated).

Docket No. P-100, Sub 133b: Re: In the Matter of Establishment of Universal Support Mechanisms Pursuant to Section 254 of the Telecommunications Act of 1996.

Docket No. P-100, Sub 133d: Re: Proceeding to Determine Permanent Pricing for Unbundled Network Elements.

Docket No. P-100, Sub 84b: Re: In the Matter of Petition of North Carolina Payphone Association for Review of Local Exchange Company Tariffs for Basic Payphone Services (Comments).

Docket No. P-561, Sub 10: BellSouth Telecommunications, Inc., Complainant, v. US LEC of North Carolina, LLC, and Metacomm, LLC, Respondents.

Public Utilities Commission of Ohio

Case No. 93-487-TP-ALT: In the Matter of the Application of The Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation.

Oklahoma Corporation Commission

Cause No. PUD 01448: In the Matter of the Application for an Order Limiting Collocation for Special Access to Virtual or Physical Collocation at the Option of the Local Exchange Carrier.

Public Utility Commission of Oregon

Docket No. UT 119: In the Matter of an Investigation into Tariffs Filed by US West Communications, Inc., United Telephone of the Northwest, Pacific Telecom, Inc., and GTE Northwest, Inc. in Accordance with ORS 759.185(4).

Docket No. ARB 3: In the Matter of the Petition of AT&T Communications of the Pacific Northwest, Inc., for Arbitration of Interconnection Rates, Terms, and Conditions Pursuant to 47 U.S.C. § 252(b) of the

Telecommunications Act of 1996. Docket No. ARB 6: In the Matter of the Petition of MCIMetro Access Transmission Services, Inc. for Arbitration of Interconnection Rates, Terms, and Conditions Pursuant to 47 U.S.C. § 252(b) of the Telecommunications Act of 1996 (consolidated).
Docket No. ARB 9: In the Matter of the Petition of an Interconnection Agreement Between MCIMetro Access Transportation Services, Inc. and GTE Northwest Incorporated, Pursuant to 47 U.S.C. Section 252

Pennsylvania Public Utilities Commission

Docket No. I-00910010: In Re: Generic Investigation into the Current Provision of InterLATA Toll Service.

Docket No. P-00930715: In Re: The Bell Telephone Company of Pennsylvania's Petition and Plan for Alternative Form of Regulation under Chapter 30.

Docket No. R-00943008: In Re: Pennsylvania Public Utility Commission v. Bell Atlantic-Pennsylvania, Inc. (Investigation of Proposed Promotional Offerings Tariff).

Docket No. M-00940587: In Re: Investigation pursuant to Section 3005 of the Public Utility Code, 66 Pa. C. S. §3005, and the Commission's Opinion and Order at Docket No. P-930715, to establish standards and safeguards for competitive services, with particular emphasis in the areas of cost allocations, cost studies, unbundling, and imputation, and to consider generic issues for future rulemaking.

South Carolina Public Service Commission

Docket No. 90-626-C: In Re: Generic Proceeding to Consider Intrastate Incentive Regulation.

Docket No. 90-321-C: In Re: Petition of Southern Bell Telephone and Telegraph Company for Revisions to its Access Service Tariff Nos. E2 and E16.

Docket No. 88-472-C: In Re: Petition of AT&T of the Southern States, Inc., Requesting the Commission to Initiate an Investigation Concerning the Level and Structure of Intrastate Carrier Common Line (CCL) Access Charges.

Docket No. 92-163-C: In Re: Position of Certain Participating South Carolina Local Exchange Companies for Approval of an Expanded Area Calling (EAC) Plan.

Docket No. 92-182-C: In Re: Application of MCI Telecommunications Corporation, AT&T Communications of the Southern States, Inc., and Sprint Communications Company, L.P., to Provide IntraLATA Telecommunications Services.

Docket No. 95-720-C: In Re: Application of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company for Approval of an Alternative Regulation Plan.

Docket No. 96-358-C: In Re: Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. 96-375-C: In Re: Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc. and GTE South Incorporated Pursuant to 47 U.S.C. § 252.

Docket No. 97-101-C: In Re: Entry of BellSouth Telecommunications, Inc. into the InterLATA Toll Market.

Docket No. 97-374-C: In Re: Proceeding to Review BellSouth Telecommunications, Inc. Cost for Unbundled Network Elements.

Docket No. 97-239-C: Intrastate Universal Service Fund.

Docket No. 97-124-C: BellSouth Telecommunications, Inc. Revisions to its General Subscriber Services Tariff and Access Service Tariff to Comply with the FCC's Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996.

Docket No. 1999-268-C: Petition of Myrtle Beach Telephone, LLC, for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Horry Telephone Cooperative, Inc.

Docket No. 1999-259-C: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Tennessee Public Service Commission

Docket No. 90-05953: In Re: Earnings Investigation of South Central Bell Telephone Company.

Docket Nos. 89-11065, 89-11735, 89-12677: AT&T Communications of the South Central States, MCI Telecommunications Corporation, US Sprint Communications Company -- Application for Limited IntraLATA Telecommunications Certificate of Public Convenience and Necessity.

Docket No. 91-07501: South Central Bell Telephone Company's Application to Reflect Changes in its Switched Access Service Tariff to Limit Use of the 700 Access Code.

Tennessee Regulatory Authority

Docket No. 96-01152: In Re: Petition by AT&T Communications of the South Central States, Inc. for Arbitration under the Telecommunications Act of 1996 and Docket No. 96-01271: In Re: Petition by MCI Telecommunications Corporation for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 (consolidated).

Docket No. 96-01262: In Re: Interconnection Agreement Negotiations Between AT&T of the South Central States, Inc. and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. § 252.

Docket No. 97-01262: Proceeding to Establish Permanent Prices for Interconnection and Unbundled Network Elements.

Docket No. 97-00888: Universal Service Generic Contested Case.

Docket No. 99-00430: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996.

Public Utility Commission of Texas

Docket No. 12879: Application of Southwestern Bell Telephone Company for Expanded Interconnection for

Special Access Services and Switched Transport Services and Unbundling of Special Access DS1 and DS3 Services Pursuant to P. U. C. Subst. R. 23.26.
Docket No. 18082: Complaint of Time Warner Communications against Southwestern Bell Telephone Company.

Virginia State Corporation Commission

Case No. PUC920043: Application of Virginia Metrotel, Inc. for a Certificate of Public Convenience and Necessity to Provide InterLATA Interexchange Telecommunications Services.

Case No. PUC920029: Ex Parte: In the Matter of Evaluating the Experimental Plan for Alternative Regulation of Virginia Telephone Companies.

Case No. PUC930035: Application of Contel of Virginia, Inc. d/b/a GTE Virginia to implement community calling plans in various GTE Virginia exchanges within the Richmond and Lynchburg LATAs.

Case No. PUC930036: Ex Parte: In the Matter of Investigating Telephone Regulatory Methods Pursuant to Virginia Code § 56-235.5, & Etc.

Washington Utilities and Transportation Commission

Docket Nos. UT-941464, UT-941465, UT-950146, and UT-950265 (Consolidated): Washington Utilities and Transportation Commission, Complainant, vs. US West Communications, Inc., Respondent; TCG Seattle and Digital Direct of Seattle, Inc., Complainant, vs. US West Communications, Inc., Respondent; TCG Seattle, Complainant, vs. GTE Northwest Inc., Respondent; Electric Lightwave, Inc., vs. GTE Northwest, Inc., Respondent.

Docket No. UT-950200: In the Matter of the Request of US West Communications, Inc. for an Increase in its Rates and Charges.

Public Service Commission of Wyoming

Docket No. 70000-TR-95-238: In the Matter of the General Rate/Price Case Application of US West Communications, Inc. (Phase I).

Docket No. PSC-96-32: In the Matter of Proposed Rule Regarding Total Service Long Run Incremental Cost (TSLRIC) Studies.

Docket No. 70000-TR-98-420: In the Matter of the Application of US West Communications, Inc. for authority to implement price ceilings in conjunction with its proposed Wyoming Price Regulation Plan for essential and noncompetitive telecommunications services (Phase III).

Docket No. 70000-TR-99-480: In the Matter of the Application of US West Communications, Inc. for authority to implement price ceilings in conjunction with its proposed Wyoming Price Regulation Plan for essential and noncompetitive telecommunications services (Phase IV).

Public Service Commission of the District of Columbia

Formal Case No. 814, Phase IV: In the Matter of the Investigation into the Impact of the AT&T Divestiture

and Decisions of the Federal Communications Commission on Bell Atlantic - Washington, D. C. Inc.'s Jurisdictional Rates.

Puerto Rico Telecommunications Regulatory Board

Case No. 98-Q-0001: In Re: Payphone Tariffs.

COMMENTS - FEDERAL COMMUNICATIONS COMMISSION

CC Docket No. 92-91: In the Matter of Open Network Architecture Tariffs of Bell Operating Companies.

CC Docket No. 93-162: Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Special Access.

CC Docket No. 91-141: Common Carrier Bureau Inquiry into Local Exchange Company Term and Volume Discount Plans for Special Access.

CC Docket No. 94-97: Review of Virtual Expanded Interconnection Service Tariffs.

CC Docket No. 94-128: Open Network Architecture Tariffs of US West Communications, Inc.

CC Docket No. 94-97, Phase II: Investigation of Cost Issues, Virtual Expanded Interconnection Service Tariffs.

CC Docket No. 97-231: Application by BellSouth to Provide In-Region InterLATA Services

CC Docket No. 98-121: Application by BellSouth to Provide In-Region InterLATA Services

CCB/CPD No. 99-27: In the Matter of Petition of North Carolina Payphone Association for Expedited Review of, and/or Declaratory Ruling Concerning, Local Exchange Company Tariffs for Basic Payphone Services.

CC Docket No. 96-128: In the Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CCB/CPD No. 99-31: Oklahoma Independent Telephone Companies Petition for Declaratory Ruling (consolidated).

REPRESENTATIVE TESTIMONY - STATE AND FEDERAL COURTS

Court of Common Pleas, Philadelphia County, Pennsylvania

Shared Communications Services of 1800-80 JFK Boulevard, Inc., Plaintiff, v. Bell Atlantic Properties, Inc., Defendant.

United States District Court for the District of South Carolina, Columbia Division

Brian Wesley Jeffcoat, on behalf of himself and others similarly situated, Plaintiffs, v. Time Warner Entertainment - Advance/Newhouse Partnership, Defendant