STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company	)	
	)	
Filing to increase Unbundled Loop	)	02-0864
and Nonrecurring Rates	)	

ISSUES LIST OF SBC ILLINOIS

Illinois Bell Telephone Company ("SBC Illinois" or the "Company"), by its attorneys, hereby presents its Issues List in the above-captioned proceeding.

I. Reasonableness Of Rate Proposals – General.

A. Economic/Policy Issues Associated With UNE Pricing: SBC Ill. Ex. 1.0 (Panfil Direct), pp. 8-12; SBC Ill. Ex. 2.0 (Aron Direct), pp. 24-54; SBC Ill. Ex. 2.1 (Aron Rebuttal), pp. 34-50, 79-81, 86-88.

B. Benchmarking Analyses: SBC Ill. Ex. 2.0 (Aron Direct), pp. 5-24; SBC Ill. Ex. 2.1 (Aron Rebuttal), pp. 1-33, 50-62; SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 13; SBC Ill. Ex. 14.0 (W. Palmer Rebuttal), pp. 34-38; SBC Ill. Ex. 20.0 (Sneed Rebuttal).

II. UNE Loop Recurring Cost Studies.

A. Compliance With TELRIC-General : SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 4-6, 13-34; SBC Ill. Ex. 4.1(Smallwood Rebuttal), pp. 1-3, 8-38.

B. Trends in Telecommunications Costs: SBC Ill. Ex. 2.1 (Aron Rebuttal), pp. 59-62; SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 33-38.

C. Major Inputs To Cost Studies.

1. Fill Factors: SBC Ill. Ex. 1.0 (Panfil Direct), pp. 16-19; SBC Ill. Ex. 2.0 (Aron Direct), pp. 45-53; SBC Ill. 2.1 (Aron Rebuttal), pp. 8, 86; SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 6-12; SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 38-49; SBC Ill. Ex. 8.0 (White Direct), pp. 3-27; SBC Ill. Ex. 8.1 (White Rebuttal), pp. 2-12; SBC Ill. 14.0 (W. Palmer Rebuttal), pp. 3-30.

2. Depreciation: SBC Ill. Ex. 13.0 (Vanston Direct); SBC Ill Ex. 13.1 (Vanston Rebuttal).

3. Cost of Capital: SBC Ill. Ex. 12.0 (Avera Direct); SBC Ill. Ex. 12.1 (Avera Rebuttal).

   a. General: SBC Ill. Ex. 12.0 (Avera Direct), pp. 6-25, 35-44; SBC Ill. Ex. 12.0. Sch. WEA-1, pp. 1-2; SBC Ill. Ex. 12.1 (Avera Rebuttal), pp. 1-5, 29-40, 69-71, 72-74, 75.

   b. Common equity: SBC Ill. Ex. 12.0 (Avera Direct), 26-29; SBC Ill. Ex. 12.0, Sch. WEA-1, pp. 7-20; SBC Ill.Ex. 12.1 (Avera Rebuttal), pp. 5-15, 40-59.

   c. Cost of debt: SBC Ill. Ex. 12.0, WEA-1, p. 20; SBC Ill. Ex. 12.1 (Avera Rebuttal), pp. 15-18, 60-61.

   d. Capital structure: SBC Ill. Ex. 12.0, pp. 30-34; SBC Ill. Ex. 12.0, Sch. WEA-1, pp. 1-7; SBC Ill. Ex. 12.1 (Avera Rebuttal), pp. 18-29, 61-69, 71-72, 74-75.

D. Other Loop Recurring Cost Modeling And Input Issues.

1. Cable and DLC Installation costs: SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 29-30; SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 49-75); SBC Ill. Ex. 8.1(White Rebuttal), pp. 13-47; SBC Ill. Ex. 15.0, pp. 7-23 (D. Palmer Rebuttal); SBC Ill. Ex. 17.0 (Dominak Rebuttal), pp. 28-30.

2. Copper/fiber crossover point: SBC Illinois Ex. 4.1 (Smallwood Rebuttal), pp. 18-22; SBC Ill. Ex. 8.1(White Rebuttal), pp. 60-61.

3. DLC investment cost issues.

   a. Remote terminal cabinet sizes: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 75-78; SBC Ill. Ex. 8.1(White Rebuttal), pp. 48-49.

   b. Controlled Environmental Vaults: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), p. 7; SBC Ill. Ex. 8.1(White Rebuttal), pp. 59-60.

   c. Alcatel discounts: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), p. 78; SBC Ill. Ex. 15.0 (D. Palmer Rebuttal), pp. 23-27.

   d. Mix of Universal Digital Loop Carrier ("UDLC") and Integrated Digital Loop Carrier ("IDLC") facilities: SBC

Ill. Ex. 4.1(Smallwood Rebuttal), pp. 78-80; SBC Ill. Ex. 8.1(White Rebuttal), pp. 51-58.

e. Number of remote terminals per COT: SBC Ill. Ex. 4.1(Smallwood Rebuttal), p. 80.

f. Building costs allocated to remote terminals: SBC Ill. Ex. 4.1(Smallwood Rebuttal), pp. 82-83.

g. Allocation of Shared DLC Components: SBC Ill. Ex. 4.1(Smallwood Rebuttal), p.81; SBC Ill. Ex. 8.1(White Rebuttal), pp. 58-59.

h. Remote terminal investment cost allocation: SBC Ill. Ex. 4.1(Smallwood Rebuttal), pp. 81-85; SBC Ill. Ex. 8.1(White Rebuttal), pp. 49-51.

4. Distribution terminal and premises terminal costs (SBC Ill. Ex. 4.1(Smallwood Rebuttal), pp. 6-7, 85-88.

5. Multiple Dwelling Units: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 5-6, 88.

6. FDI costs: SBC Ill. Ex. 4.1(Smallwood Rebuttal), p. 89-90; SBC Ill. Ex. 8.1(White Rebuttal), pp. 67-71.

7. Distribution Area modeling: SBC Ill. Ex. 4.1(Smallwood Rebuttal), pp. 90-96; SBC Ill. Ex. 8.1(White Rebuttal), pp. 62-67.

8. Loop length, cable size and cable gauge modeling: SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 23-28; SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 96-102; SBC Ill. Ex. 8.1(White Rebuttal), pp. 71-72.

   a. Distribution lengths over 18,000 feet: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 96-97.

   b. Data used to develop loop lengths: SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 25-26; SBC Ill. Ex. 4.1(Smallwood Rebuttal), pp. 28, 97, 100-101.

   c. Distribution cable resistance limits: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 98-99.

d. Allocation of copper cable inventory between feeder and distribution plant: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), p. 99.

e. Copper cable mix: SBC Ill. Ex. 4.1 (Smallwood Rebuttal), p. 100.

f. Cable sizing: SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 27-28; SBC Ill. Ex. 4.1 (Smallwood Rebuttal), pp. 93-95, 100-101; SBC Ill. Ex. 8.1 (White Rebuttal), pp. 71-72.

9. Feeder Stubs: SBC Ill. Ex. 4.1(Smallwood Rebuttal), p. 103.

10. Planning Period: SBC Ill. Ex. 4.1(Smallwood Rebuttal), p. 103.

11. Previous Methodologies: SBC Ill. Ex. 4.0 (Smallwood Direct), pp. 23-34; SBC Ill. Ex. 14.0 (W. Palmer Rebuttal), pp. 30-34.

III. Non-Recurring Cost Studies And Rate Designs.

A. Compliance With TELRIC.

1. TELRIC Standards/Principles: SBC Ill. Ex. 5.0 (Currie Direct), pp. 5-8; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 8-16; SBC Ill. Ex. 6.0 (Cass Direct)[1], pp. 4-8.

2. Treatment of technology: SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 10-16; SBC Ill. Ex. 16.0 (Deere Rebuttal), pp. 3-8.

B. Use of Subject Matter Experts: SBC Ill. Ex. 5.0 (Currie Direct), pp. 8-9; SBC Ill. Ex. 6.0 (Cass Direct), pp. 5-6; SBC Ill. Ex. 10.0 (Brown Direct)[2] pp. 8-9; SBC Ill. Ex. 10.1 (Christensen Rebuttal), pp. 14-17; SBC Ill. Ex. 9.0 (Gomez-McKeon Direct), pp. 4-10; SBC Ill. Ex. 9.1 (Gomez-McKeon Rebuttal), p. 2; SBC Ill. Ex. 7.0 (Barch Direct), pp. 64-66, 69-70.

C. Service Order Nonrecurring Cost Studies: SBC Ill. Ex. 5.0 (Currie Direct), pp. 8, 10-48; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 20-47.

1. Identification of tasks: SBC Ill. Ex. 5.0 (Currie Direct), pp. 13-16, 17-22, 30-35, 37-40, 41-42, 43-48; SBC Ill. Ex. 10.0 (Brown Direct), pp. 3-17; SBC Ill. Ex. 10.1 (Christensen Rebuttal), pp. 4-5.

[1] The Direct Testimony of Chris Cass has been adopted by Dr. Kent Currie.
[2] The Direct Testimony of Justin Brown has been adopted by Fred Christensen.

2. Activity times: SBC Ill. Ex. 5.0 (Currie Direct), pp. 16-17; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 37-47; SBC Ill. Ex. 10.0 (Brown Direct), pp. 7-9; SBC Ill. Ex. 10.1 (Christensen Rebuttal), pp. 6-14.

3. Occurrence probabilities: SBC Ill. Ex. 5.0 (Currie Direct), pp. 22-25, 35-36, 40-41, 42-43, 47-48; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 46-47; SBC Ill. Ex. 10.0 (Brown Direct), pp. 7, 17-18; SBC Ill. Ex. 10.1 (Christensen Rebuttal), pp. 3-4.

4. Service order computer processing costs: SBC Ill. Ex. 5.0 (Currie Direct), pp. 26-29; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 23-26.

5. Fallout rates: SBC Ill. Ex. 5.0 (Currie Direct), pp. 25-26; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 27-37, 46-47; SBC Ill. Ex. 11.0 (Mitchell Direct)[3], pp. 2-7; SBC Ill. Ex. 11.1 (McNiel Rebuttal), pp. 2-12; SBC Ill. Ex. 19.0 (Wiesle Rebuttal), pp. 2-4.

D. Provisioning Nonrecurring Cost Studies: SBC Ill. Ex. 6.0 (Cass Direct), pp. 8-28; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 20-22, 37-48.

1. Identification of tasks: SBC Ill. Ex. 6.0 (Cass Direct), pp. 9-16, 21-28; SBC Ill. Ex. 9.0 (Gomez-McKeon Direct), pp. 3-9, 11-21; SBC Ill. Ex. 9.1 (Gomez-McKeon Rebuttal), p. 6-22, 24-35.

2. Activity times: SBC Ill. Ex. 6.0 (Cass Direct), pp. 9-16, 20-21; ; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 37-43; SBC Ill. Ex. 9.0 (Gomez-McKeon Direct), pp. 7-11, 13,14, 16, 18, 20-21; SBC Ill. Ex. 9.1 (Gomez-McKeon Rebuttal), p. 7-22, 24-35.

3. Occurrence probabilities: SBC Ill. Ex. 6.0 (Cass Direct), pp. 9-19; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 44-48; SBC Ill. Ex. 9.0 (Gomez-McKeon Direct), pp. 7-8, 15; SBC Ill. Ex. 9.1 (Gomez-McKeon Rebuttal), p. 7-24.

E. Switch Port And Features Nonrecurring Cost Studies.

1. Identification of tasks: SBC Ill. Ex. 7.0 (Barch Direct), pp. 64-71; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 68-69, 73-74.

2. Activity times: SBC Ill. Ex. 7.0 (Barch Direct), pp. 64-71; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 72, 74-75; SBC Ill. Ex. 18.0 (Cunningham Rebuttal), pp. 2-6.

[3] The Direct Testimony of John Mitchell has been adopted by Lance McNiel.

3. Occurrence probabilities; SBC Ill. Ex. 7.0 (Barch Direct), pp. 64-71; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 69-73.

4. Fallout rates: SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 68; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 69-73.

F. Miscellaneous.

1. Special Access to UNE Conversion Recurring Cost Study: SBC Ill. Ex. 3.0 (Silver Direct), pp. 19-20; SBC Ill. Ex. 5.0 (Currie Direct), pp. 36-37; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 45-46, 48-49: SBC Ill. Ex. 6.0 (Cass Direct), pp. 28-33; SBC Ill. Ex. 9.1 (Gomez-McKeon Rebuttal), p. 35-37; SBC Ill. Ex. 3.1 (Silver Rebuttal), p. 11.

2. ULS Billing Establishment: : SBC Ill. Ex. 5.0 (Currie Direct), pp. 49-50.

G. Rate Design Issues.

1. Disaggregation of Connect and Disconnect Charges; SBC Ill. Ex. 3.1 (Silver Rebuttal), pp. 2-5, 12-13.

2. EEL NRCs: SBC Ill. Ex. 3.0 (Silver Direct), pp. 20-21; SBC Ill. Ex. 5.0 (Currie Direct), pp. 43-48; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 44-45; SBC Ill. Ex. 9.0 (Gomez-McKeon Direct), pp. 21-22; SBC Ill. Ex. 9.1 (Gomez-McKeon Rebuttal), p. 2-5, 7-22; SBC Ill. Ex. 3.1 (Silver Rebuttal), pp. 5-10.

3. UNE-P and UNE-L non-recurring charges: SBC Ill. Ex.3.0 (Silver Direct), pp. 4-19; : SBC Ill. Ex. 3.1 (Silver Rebuttal), pp. 11-13; SBC Ill. Ex. 5.1 (Currie Rebuttal), p. 20.

IV. Labor Rates: SBC Ill. Ex. 7.0 (Barch Direct), pp. 53-59; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 49-66, 76; SBC Ill. Ex. 5.1 (Currie Rebuttal), pp. 26-27.

V. Shared And Common Factors.

A. Issues Common To Shared And Common Factors Development.

1. Use of new methodology generally: SBC Ill. Ex. 7.0 (Barch Direct), pp. 5-10, 28-32; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 5-6; SBC Ill. Ex. 1.1 (Panfil Rebuttal), pp. 25-26.

2. Use of regulated and unregulated data: SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 7-10; SBC Ill. Ex. 14.0 (W. Palmer Rebuttal), pp. 48-52.

3. Productivity and efficiency: SBC Ill. Ex. 7.0 (Barch Direct), pp. 48-51); SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 10-13; SBC Ill. Ex. 2.1 (Aron Rebuttal), pp. 78-79; SBC Ill. Ex. 14.0 (W. Palmer Rebuttal), pp. 42-44.

B. Common Cost Factor.

1. Development of the denominator: SBC Ill. Ex. 7.0 (Barch Direct), pp. 13-18; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 14-15, 24-25; SBC Ill. Ex. 14.0 (W. Palmer Rebuttal), pp. 38-45.

2. The 67XX accounts: SBC Ill. Ex. 7.0 (Barch Direct), p. 10; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 15-24; SBC Ill. Ex. 14.0 (W. Palmer Rebuttal), pp. 45-48; SBC Ill. Ex. 17.0 (Dominak Rebuttal), pp. 4-5.

3. Transition benefit obligation: SBC Ill. Ex. 7.0 (Barch Direct), pp. 22-25; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 25-26; SBC Ill. Ex. 17.0 (Dominak Rebuttal), pp. 5-11.

4. Pension settlement gains: SBC Ill. Ex. 7.0 (Barch Direct), pp. 11-13; SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 27; SBC Ill. Ex. 17.0 (Dominak Rebuttal), pp. 11-18.

5. Merger savings: SBC Ill. Ex. 7.0 (Barch Direct), pp. 25-28; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 27-30.

6. Employee levels: SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 30-31; SBC Ill. Ex. 17.0 (Dominak Rebuttal), pp. 26-27.

7. OSS Testing Costs: SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 75.

8. Tier 1 Remedy Payments: SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 76.

9. Digital Divide Payments: SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 76.

10. Non-Chicago Sales Tax: SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 76.

C. Shared Cost Factor.

1. Definition of wholesale shared costs: SBC Ill. Ex. 7.0 (Barch Direct), pp. 18-19; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 32-37.

2. Uncollectible expense: SBC Ill. Ex. 7.0 (Barch Direct), pp. 18-21; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 37-38; SBC Ill. 17.0 (Dominak Rebuttal), pp. 18-26.

3. Wholesale marketing expense: SBC Ill. Ex. 7.0 (Barch Direct), pp. 18-21; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 38-40.

VI. Annual Charge and Other Factors.

A. Annual Charge Factors.

1. Adjustments to maintenance and other expense factors: SBC Ill. Ex. 7.0 (Barch Direct), pp. 42-46; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 41-43.

2. Ad valorem factor: SBC Ill. 7.1 (Barch Rebuttal), pp. 43-44.

3. Capital cost factor: SBC Ill. Ex. 7.0 (Barch Direct), pp. 40-41; SBC Ill. Ex. 7.1 (Barch Rebuttal), p. 44; SBC Ill. Ex. 12.1 (Avera Rebuttal), p. 75.

B. Investment Factors: SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 44-45, 76.

C. Support Asset Factors: SBC Ill. Ex. 7.0 (Barch Direct), pp. 60-63); SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 45-48, 76.

D. Inflation/Deflation Factors: SBC Ill. Ex. 7.0 (Barch Direct), pp. 48-53; SBC Ill. Ex. 7.1 (Barch Rebuttal), pp. 48-49.

VII. Imputation and Price Squeeze: SBC Ill. Ex. 1.0 (Panfil Direct), pp. 23-24; SBC Ill. Ex. 1.1 (Panfil Rebuttal), pp. 8-25; SBC Ill. Ex. 2.0 (Aron Direct), pp. 24-33; SBC Ill. Ex. 2.1 (Aron Rebuttal), pp. 63-73.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Karl B. Anderson, an attorney, certify that a copy of the foregoing **ISSUES LIST OF SBC ILLINOIS** was served on the following parties by U.S. Mail and/or electronic transmission on February 13, 2004.

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