

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE COMMISSION)
INVESTIGATION AND GENERIC PROCEEDING)
OF RATES AND UNBUNDLED NETWORK)
ELEMENTS AND COLLOCATION FOR INDIANA) CAUSE NO. 42393
BELL TELEPHONE COMPANY, INCORPORATED)
d/b/a SBC INDIANA PURSUANT TO THE) Served: 8/29/03
TELECOMMUNICATIONS ACT OF 1996 AND)
RELATED INDIANA STATUTES)

AT&T RESPONSE TO INDIANA BELL TELEPHONE COMPANY'S
FOURTH SET OF DATA REQUESTS TO JOINT CLECS

AT&T Communications of Indiana GP and TCG Indianapolis ("AT&T"), hereby respond to Indiana Bell Telephone Company ("SBC") Fourth Set of Data Requests to Joint CLECs as directed to AT&T.

GENERAL OBJECTIONS

1. AT&T objects to SBC's data requests insofar as they seek disclosure of information that is protected by the attorney-client privilege and/or attorney work-product doctrine.
2. AT&T objects to SBC's data requests that seek information concerning AT&T's business plans and strategy in Indiana. This information is clearly irrelevant to SBC's forward-looking TELRIC costs and, as such, SBC's requests are not reasonably calculated to lead to the discovery of admissible evidence.
3. AT&T objects to this set of requests as premature, as discovery is continuing and a hearing has yet to be conducted, AT&T reserves its right to use information disclosed in discovery and in hearing to support its case.

Dated: August 29, 2003

Respectfully submitted,

/s/ Clark Stalker /

Clark Stalker

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Request No. 94. (AT&T)

Describe with particularity the experience to which Mr. Turner refers in each of the references in the table above. Indicate for each item above where and when Mr. Turner obtained the experience to which he refers, including the name of his employer, his job title and his job responsibilities at the time(s) when he obtained the experience to which he refers.

Response:

Subject to its objections, AT&T responds as follows:

Request A: The experience Mr. Turner refers to here is his general experience in working with Lucent and Nortel switch manufacturers and their mutual interest in selling products that have equivalent provisioning capabilities. Specifically, Mr. Turner has contacted provisioning experts who have operated both switches to inquire as to whether the provisioning times for these switches vary significantly. The information provided was that they do not. In addition, in his capacity as a consultant, Mr. Turner has independently worked on projects evaluating whether to purchase Lucent and Nortel switches for a CLEC. In this evaluation, Mr. Turner did not find that provisioning differences existed in any significant degree between the two switch types. The experience gained was primarily while Mr. Turner was a consultant with Kaleo Consulting, although Mr. Turner's general knowledge of switching is also based on his work experience at AT&T as detailed in Attachment SET-1.

Request B: Please see the response to Request A above. In addition, Mr. Turner's specific reference to "my experience" in this context is also related to a TELRIC requirement that in the long run, the most efficient switch technology will be used. Mr. Turner's experience is based on evaluating, modifying, and testifying on TELRIC costing issues in approximately 30 states over the last seven years.

Request C: Mr. Turner has obtained his experience related to trunk port provisioning from four different sources. *First*, Mr. Turner has discussed this provisioning issue with experts in switch provisioning to confirm his understanding of the process related to trunk port provisioning and the times involved. Mr. Turner has observed this process while a Departmental Quality Manager at AT&T and, specifically, as part of his responsibilities to identify efficient processes and improve upon them. Mr. Turner also confirmed his observations with provisioning experts as well. *Second*, Mr. Turner ran a CLEC – ALT Communications – that sold UNE-P arrangements to business and residential customers. One of the products ALT Communications sold was DID Trunk Port provisioning arrangements. Mr. Turner specifically discussed the provisioning of these arrangements with SBC Texas personnel and confirmed that the provisioning of the first port required the most time, but that subsequent ports would require minimal additional time into the DID arrangement. *Third*, Mr. Turner has reviewed provisioning cost studies in numerous states and the arrangement Mr. Turner discusses is typical of how the initial DID port is distinguished in time from that of the additional DID ports. *Fourth*, please note that in this particular reference SBC Indiana’s own time estimate is confirmation of Mr. Turner’s experience in that Mr. Turner did not modify the time estimate for the Lucent switch that SBC Indiana made for the initial port.

Request D: Please see the response to Request C above. However, the specific reference to experience here is to Mr. Turner’s selling and provisioning of DID Trunk Port Arrangements to customers of ALT Communications.

Request E: As a manager at AT&T, Mr. Turner observed that when dispatches were made to unmanned locations the technician would typically perform more than one activity when

dispatched to that office. This experience was gained as a Departmental Quality Manager, Project Manager/System Engineer, and as a District Manager. Moreover, Mr. Turner has participated in cost proceedings with SBC (referenced in the Response Testimony) where SBC has acknowledged that its personnel do perform multiple activities when dispatched to a central office.

Request F: The experience referred to here is in part based on Mr. Turner's review of SBC's nonrecurring cost studies filed in Missouri Public Service Commission Case No. TO-2001-438. Given that SBC Indiana has asked for the support of Mr. Turner's experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XX END CONFIDENTIAL***** minute time for the "Login and Completeness Check" function in multiple cost studies in Missouri. This is the identical function to that used in SBC Indiana's EEL Cost Study which is also entitled the "Login and Completeness Check" by SBC Indiana. Some of the specific SBC Missouri cost studies that use the *****CONFIDENTIAL XX END CONFIDENTIAL***** minute time for the "Login and Completeness Check" are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F38 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F92 – This particular time is for the 2-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F143 – This particular time is for the 4-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F178 – This particular time is for the 2-Wire Digital Loop to DCS Cross-Connect function

performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F244 – This particular time is for the 2-Wire Analog Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F272 – This particular time is for the 2-Wire Digital Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F37 – This particular time is for the STP to Collocation Cage – DS0 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F95 – This particular time is for the STP to Collocation Cage – DS1 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F21 – This particular time is for the Voice Grade 2-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F55 – This particular time is for the Voice Grade 4-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F483 – This particular time is for the DS1 to Voice Grade Multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request G: There are two references to “experience” in these lines identified in the SBC Indiana request. The first reference relates, in part, to Mr. Turner’s experience in reviewing SBC’s cost studies as documented in response to Request F above. Given that SBC Indiana has asked for the support of Mr. Turner’s experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XX END CONFIDENTIAL***** minute time for the “Login and

Completeness Check” function in multiple cost studies in Missouri for the additional activities. This is the identical function to that used in SBC Indiana’s EEL Cost Study which is also entitled the “Login and Completeness Check” by SBC Indiana. Some of the specific SBC Missouri cost studies that use the *****CONFIDENTIAL XX END** **CONFIDENTIAL***** minute incremental time for the “Login and Completeness Check” are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F38 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F92 – This particular time is for the 2-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F143 – This particular time is for the 4-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F178 – This particular time is for the 2-Wire Digital Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F244 – This particular time is for the 2-Wire Analog Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F272 – This particular time is for the 2-Wire Digital Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G37 – This particular time is for the STP to Collocation Cage – DS0 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G95 – This particular time is for the STP to Collocation Cage –

DS1 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhsIUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G21 – This particular time is for the Voice Grade 2-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhsIUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G55 – This particular time is for the Voice Grade 4-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhsIUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G483 – This particular time is for the DS1 to Voice Grade Multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

The second reference in this request relates to Mr. Turner's experience related to the time to perform a 4-wire cross-connect. As a manager at AT&T (Project Manager/System Engineer), Mr. Turner was responsible for the cross-connects between incumbent LEC facilities and AT&T facilities at interface points. These cross-connects typically required five minutes when four-wire cross-connects were made. Mr. Turner also makes reference in his testimony to observing this same cross-connect time in cost studies. Specifically, Mr. Turner has observed this cross-connect time in SBC cost studies in Missouri. Given that SBC Indiana has asked for the support of Mr. Turner's experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XX END CONFIDENTIAL***** minute time for the 4-Wire Cross-connect in multiple cost studies in Missouri. Some of the specific SBC Missouri cost studies that use the *****CONFIDENTIAL XX END CONFIDENTIAL***** minute time for the 4-Wire Cross-connect time are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E41 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect function

performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F41 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect additional function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E145 – This particular time is for the 4-Wire Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F145 – This particular time is for the 4-Wire Loop to DCS Cross-Connect additional function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN, DCS, MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F56 – This particular time is for the 4-Wire Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN, DCS, MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G56 – This particular time is for the 4-Wire Loop to DCS Cross-Connect additional function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request H: The experience referred to here is in part based on Mr. Turner’s review of SBC’s nonrecurring cost studies filed in Missouri Public Service Commission Case No. TO-2001-438. Given that SBC Indiana has asked for the support of Mr. Turner’s experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XX END CONFIDENTIAL***** minute time for the “Circuit Completion and Order Close-out” function in multiple cost studies in Missouri. This is the identical function to that used in SBC Indiana’s cost studies which is also entitled the “Order Completion and Closeout” by SBC Indiana. Some of the specific SBC Missouri cost studies that use the *****CONFIDENTIAL XX END**

CONFIDENTIAL*** minute time for the “Circuit Completion and Order Close-out” are

as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E45 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E96 – This particular time is for the 2-Wire Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E147 – This particular time is for the 4-Wire Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E181 – This particular time is for the 2-Wire Digital Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E250 – This particular time is for the 2-Wire Analog Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E275 – This particular time is for the 2-Wire Digital Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F44 – This particular time is for the STP to Collocation Cage – DS0 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F100 – This particular time is for the STP to Collocation Cage – DS1 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F24 – This particular time is for the Voice Grade 2-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F58 – This particular time is for the Voice Grade 4-Wire Cross-

Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhsIUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F489 – This particular time is for the DS1 to Voice Grade Multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request I: The experience referred to here is based in part on Mr. Turner’s experience running ALT Communications where the vast majority (more than 90 percent) of the lines ordered were migrations from SBC’s network to a UNE-P platform for ALT Communications. Mr. Turner’s recommendation that 90 percent of line-port combinations are migrations is also confirmed by his industry experience working with numerous CLECs across the country. Further, Mr. Turner’s view that 90 percent of lines are migrations was supported by the findings of the Wisconsin Public Service Commission as documented in Mr. Turner’s Response Testimony at pages 71-72.

Request J: Please see the response to Request H.

Request K: The experience referred to here is in part based on Mr. Turner’s review of SBC’s nonrecurring cost studies filed in Missouri Public Service Commission Case No. TO-2001-438. Given that SBC Indiana has asked for the support of Mr. Turner’s experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XXX END CONFIDENTIAL***** minute time for the “Circuit Completion and Order Close-out” function in multiple cost studies in Missouri for DS1 and DS3 related activities. This is the identical function to that used in SBC Indiana’s cost studies which is also entitled the “Order Completion and Closeout” by SBC Indiana for DS1 and DS3 related activities. Some of the specific SBC

Missouri cost studies that use the *****CONFIDENTIAL XX END**

CONFIDENTIAL*** minute time for the “Circuit Completion and Order Close-out” are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E214
– This particular time is for the 4-Wire Digital Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E301
– This particular time is for the 4-Wire Digital Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E334
– This particular time is for the DS3 Loop Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F94 – This particular time is for the DS1 cross-connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F140 – This particular time is for the DS1 cross-connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F185 – This particular time is for the DS3 cross-connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F548 – This particular time is for the DS3 to DS1 multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F618 – This particular time is for the OC3 to DS1 multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F688 – This particular time is for the OC3 to DS3 multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F757 – This particular time is for the OC3 to EC1 multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F826 – This particular time is for the OC12 to DS3 multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F895 – This particular time is for the OC12 to EC1/STS1 multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request L: The experience referred to here is in part based on Mr. Turner’s review of SBC’s nonrecurring cost studies filed in Missouri Public Service Commission Case No. TO-2001-438. Given that SBC Indiana has asked for the support of Mr. Turner’s experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XXX END CONFIDENTIAL***** minute time for the “Login and Completeness Check” function in multiple cost studies in Missouri. This is the identical function to that used in SBC Indiana’s cost studies which is also entitled the “Log-in and Completeness Check” function by SBC Indiana. Some of the specific SBC-Missouri cost studies that use the *****CONFIDENTIAL XXX END CONFIDENTIAL***** minute time for the “Login and Completeness Check” are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E38 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E92 – This particular time is for the 2-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E143
– This particular time is for the 4-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E178
– This particular time is for the 2-Wire Digital Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E244
– This particular time is for the 2-Wire Analog Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell E272
– This particular time is for the 2-Wire Digital Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F37 – This particular time is for the STP to Collocation Cage – DS0 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F95 – This particular time is for the STP to Collocation Cage – DS1 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F21 – This particular time is for the Voice Grade 2-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F55 – This particular time is for the Voice Grade 4-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell F483 – This particular time is for the DS1 to Voice Grade Multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request M: The experience referred to here is in part based on Mr. Turner’s review of SBC’s nonrecurring cost studies filed in Missouri Public Service Commission Case No. TO-2001-438. Given that SBC Indiana has asked for the support of Mr. Turner’s experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XXX END CONFIDENTIAL***** minute additional time for the “Login and Completeness Check” function in multiple cost studies in Missouri. This is the identical function to that used in SBC Indiana’s cost studies which is also entitled the “Log-in and Completeness Check” function by SBC Indiana. Some of the specific SBC Missouri cost studies that use the *****CONFIDENTIAL XXX END CONFIDENTIAL***** minute additional time for the “Login and Completeness Check” are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F38 – This particular time is for the 4-Wire Loop to Multiplexor Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F92 – This particular time is for the 2-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F143 – This particular time is for the 4-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F178 – This particular time is for the 2-Wire Digital Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F244 – This particular time is for the 2-Wire Analog Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F272 – This particular time is for the 2-Wire Digital Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G37 – This particular time is for the STP to Collocation Cage – DS0 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

SS7 LINKS XCONN_N_WhslUNE_MO_01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G95 – This particular time is for the STP to Collocation Cage – DS1 Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G21 – This particular time is for the Voice Grade 2-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G55 – This particular time is for the Voice Grade 4-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G483 – This particular time is for the DS1 to Voice Grade Multiplexing function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request N: The experience referred to here is based in part of Mr. Turner's discussions with personnel who have actually performed two-wire cross-connects. Further, the experience referred to here is in part based on Mr. Turner's review of SBC's nonrecurring cost studies filed in Missouri Public Service Commission Case No. TO-2001-438. Given that SBC Indiana has asked for the support of Mr. Turner's experience, Mr. Turner has provided the references to the SBC cost studies in Missouri. Specifically, SBC uses a *****CONFIDENTIAL XXX END CONFIDENTIAL***** minute time for

additional 2-wire cross-connects in multiple cost studies in Missouri. This is the identical function to that used in SBC Indiana's cost studies, which is also referred to as 2-wire cross-connects by SBC Indiana. Please note that although this is the time for the "additional" cross-connect, there is no cost basis for the time for an initial cross-connect to be greater in time. Some of the specific SBC Missouri cost studies that use the ***CONFIDENTIAL XXX END CONFIDENTIAL*** minute time for the 2-wire cross-connects are as follows:

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F94 – This particular time is for the 2-Wire Analog Loop to DCS Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

MO Loop Cross Connects_01 Workbook, TAB 6.2 Worksheet, Cell F245 – This particular time is for the 2-Wire Analog Loop to Switch Port Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

UDTXCONN,DCS,MUX_N_WhslUNE_MO-01-03_TFA Workbook, TAB 6.2 Worksheet, Cell G22 – This particular time is for the Voice Grade 2-Wire Cross-Connect function performed by the COF technician, which is the SBC-Missouri name for the LFO-IN technician in SBC Indiana.

Request O: Mr. Turner has personally observed the provisioning of DS1 and DS3 cross-connects as a 4ESS Switch Engineer in that he was personally involved in a project to shorten the installation time for 4ESS switching components. Part of this project involved performing detailed task time reviews of various functions within the central office including DS1 cross-connects. Mr. Turner further reviewed these processes as a Departmental Quality Manager. Finally, as part of Mr. Turner's responsibilities as a consultant evaluating TELRIC cost studies, Mr. Turner has personally observed during

incumbent LEC central office tours, and consulted with experts, DS1 and DS3 cross-connect provisioning, confirming the facts identified in his Response Testimony.

Request P: Please see the response to Request H above.

Request Q: Please see the response to Request K above.

Request R: As an Operations Supervisor with AT&T, Mr. Turner managed a team of 20 associates who managed over 2000 customer trouble reports per month. Part of this process was to identify a code for the trouble once cleared and to make comments in the trouble log for the customer trouble. From personal observation of this similar process to the process referenced by SBC Indiana, and from performing this work personally, Mr. Turner estimated the time required at one minute.

Request S: As with the response to Request R above, Mr. Turner's experience is based on his responsibilities as an Operations Supervisor with AT&T. Specifically, efficient OSS provide the associates with a log of open work activities that the associate is simply able to electronically select. This function takes virtually no time, as Mr. Turner noted in his Response Testimony.

Request T: Please see the response to Request R above.

Request U: Please see the response to Request R above.

Request V: Please see the response to Request S above.

Request W: Please see the response to Request R above.