

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
On Its Own Motion)	
vs)	
Illinois Bell Telephone Company)	Docket 06-0027
)	
Investigation of specified tariffs declaring certain)	
services to be competitive telecommunications services)	

**VERIFIED RESPONSE OF AT&T ILLINOIS TO
COMMISSION REQUEST FOR INFORMATION**

Pursuant to the Order, dated January 11, 2006, initiating this proceeding, Illinois Bell Telephone Company (“AT&T Illinois” or the “Company”) hereby provides its verified response to the requests for information contained in Appendix B to the Order.

Request No. 1

For the Chicago LATA (MSA 1), Illinois Bell Telephone Company ("AT&T Illinois" or "the Company") shall provide, at a minimum, any and all data and evidence supporting detailed analysis of the following factors for each reclassified service:

- 1.1 The number, size, and geographic distribution of other providers of the service;
- 1.2 The availability of functionally equivalent services in the relevant geographic area and the ability of telecommunications carriers or other persons to make the same, equivalent, or substitutable service readily available in the relevant market at comparable rates, terms, and conditions;
- 1.3 The existence of economic, technological, or any other barriers to entry into, or exit from, the relevant market; and
- 1.4 The extent to which other telecommunications companies must rely upon the service of another telecommunications carrier to provide telecommunications service.

Response:

1.1 Information responsive to this request is contained in AT&T Illinois’ direct testimony, as follows:

Direct Testimony of W. Karl Wardin (AT&T Ill. Ex. 1.0), pp. 15-26, 41-43, 45-48, Schs. WKW-2, WKW-3, WKW-3A, WKW-4, WKW-5, WKW-10, WKW-11, WKW-12, WKW-13A

Direct Testimony of Sandy Moore (AT&T Ex. 2.0), pp. 4-5, 11-12, 15

Direct Testimony of Dr. William Taylor (AT&T Ill. Ex. 3.0), pp. 17-29

Direct Testimony of Harry M. Shooshan (AT&T Ill. Ex. 4.0), pp. 13-14, 22, 48-49, Schs. HMS-2 and HMS-3

1.2 Information responsive to this request includes all of the testimony and schedules identified in response to item 1.1, above, as well as the following:

Direct Testimony of W. Karl Wardin (AT&T Ill. Ex. 1.0), pp. 26-62, Schs. WKW-6, WKW-7, WKW-8, WKW-13

Direct Testimony of Sandy Moore (AT&T Ill. Ex. 2.0), pp. 3-20, Schs. SMM-2, SMM-3, SMM-4, SMM-5, SMM-6, SMM-7, SMM-8

Direct Testimony of Dr. William Taylor (AT&T Ill. Ex. 3.0), pp. 6-17, 29-33, 46-49, Sch. WET-2

Direct Testimony of Harry M. Shooshan (AT&T Ill. Ex. 4.0), pp. 14-22, 23-47, 49-57, Schs. HMS-2, HMS-3, HMS-4, HMS-5, HMS-6, HMS-7, HMS-8

1.3 Information responsive to this request is contained in AT&T Illinois' direct testimony, as follows:

Direct Testimony of Dr. William Taylor (AT&T Ill. Ex. 3.0), pp. 33-38, 46-49

Direct Testimony of Harry M. Shooshan (AT&T Ill. Ex. 4.0), p. 48

In addition, the direct testimony and schedules of W. Karl Wardin are generally responsive to this request.

1.4 Information responsive to this request is contained in the AT&T Illinois' direct testimony, as follows:

Direct Testimony of W. Karl Wardin (AT&T Ill. Ex. 1.0), pp. 40-51, Schs. WKW-5, WKW-9, WKW-13, WKW-13A

Direct Testimony of Dr. William Taylor (AT&T Ill. Ex. 3.0), pp. 38-39

Request No. 2

If AT&T Illinois plans to cite the existence of intermodal technologies, such as Voice over Internet Protocol and Commercial Mobile Radio Service Providers, as competitive alternatives to the services that it has reclassified, the Company shall state this and supply the following:

- 2.1 The extent to which AT&T Illinois will rely on such providers as competitive alternatives.
- 2.2 The names of these providers and the services they offer that are functionally equivalent services to the ones that the Company reclassified on November 10.
- 2.3 A contact list of the providers that the Company is referencing in its answers to the preceding two questions on this subject.

Response:

2.1 In its direct testimony, AT&T Illinois cites wireless service and VOIP service provided by entities other than competitive local exchange carriers as competitive alternatives to the services that AT&T Illinois reclassified on November 10, 2005. The extent to which AT&T relies on providers of such competitive alternatives as support for that reclassification is addressed in the following testimony:

Direct Testimony of W. Karl Wardin (AT&T Ill. Ex. 1.0), pp. 28-29, 31-32, 37, 39, 52-62, Schs. WKW-5, WKW-7, WKW-8

Direct Testimony of Sandy Moore (AT&T Ex. 2.0), pp. 11-20, Schs. SMM-6, SMM-7, SMM-8, SMM-9

Direct Testimony of Dr. William Taylor (AT&T Ill. Ex. 3.0), pp. 23-29, Sch. WET-2

Direct Testimony of Harry M. Shooshan (AT&T Ill. Ex. 4.0), pp. 22-57, Schs. HMS-2, HMS-3, HMS-4, HMS-5, HMS-6, HMS-7, HMS-8

2.2 The testimony referred to in response to Request item 2.1, above, identifies the names of wireless and VOIP providers and the services they offer that are functionally equivalent to and/or substitutes for the services reclassified by AT&T Illinois on November 10, 2005. The names of these entities are also listed in the response to Request Item 2.3, below.

2.3 A contact list for the providers referenced in response to Request items 2.1 and 2.2 is attached as Schedule 7.1.

Request No. 3

In order to address other factors and the impact on the public interest, the Company shall include for the Chicago LATA (MSA 1):

- 3.1 How many and what percentage of AT&T Illinois' residential customers subscribe to the following:
 - a. measured local service i.e. purchase the access line and pay for each local call
 - b. the "basic" rate package i.e. the package offered by AT&T Illinois that includes an access line and unlimited local usage for a fixed fee.
- 3.2 Grouping all AT&T Illinois residential lines with measured local service and within MSA 1 into ranges based on the number of local Band A and Band B calls made with the line in December 2005 (or the most recent month available) in increments of 15-calls up to 180 calls and in increments of 60-calls thereafter (e.g., lines with 0 calls, 1-15 calls, 16-30 calls, ..., 166-180 calls, 181 -240 calls, 241-300 calls, etc.):
 - a. the number of lines within the range
 - b. the aggregate number of local calls made with lines within the range
 - c. the aggregate local usage revenue for lines within the range (for example, the company might have 100 lines that generated 166-180 local calls, an aggregate total of 17,000 local calls made by customers with lines generating between 166-180 calls, and aggregate revenue of \$850 dollars from calls made by customers with lines generating between 166-180 calls.).

Response:

- 3.1
 - a. As of December, 2005, 1,485,000 customers, or 51% of AT&T Illinois residence customers, subscribed to measured local service.
 - b. As of December, 2005, 6,435 customers, or .22% of AT&T Illinois residence customers, subscribed to the "basic" rate package.
- 3.2 See attached confidential Schedule 7.2. That schedule contains December, 2005 data for MSA1 residence customers who subscribe to measured local service. Local usage data for those customers who subscribe to packages or local usage call plans are not included.

Request No. 4

The Company shall supply the following evidence:

- 4.1 Imputation tests for services for all services for which none was provided in this filing, or a statement indicating why a given service does not require an imputation test. All studies and work papers used in the derivation of data used in the included tests shall also be provided.
- 4.2 Imputation tests for residential network access lines and ISDN lines that are consistent with the form of the test in Docket 04-0461 or a detailed explanation as to why a departure from that form is justified. All studies and work papers used in the derivation of data used in the included tests shall also be provided.

- 4.3 All cost models and studies used in the derivation of LRSICs for services in this filing that have not yet been submitted.
- 4.4 A detailed description of the impact on the alternative regulation plan. This description shall include calculations of the revenue impact in each of the service baskets, as well as the impact on the API of each basket. The calculation shall be sufficiently detailed so that the quantity of each service in each basket that is no longer in the plan as a result of this filing is listed.

Response:

4.1 Information responsive to the request is contained in the Direct Testimony of Eric Panfil (AT&T Ill. Ex. 5.0), p. 10 and Schedule ELP-2. The requested studies and work papers are included on a computer CD that is being provided to the Commission Staff concurrently with the filing of this Response. That CD will be made available upon request to the Administrative Law Judge and parties which execute a Proprietary Agreement.

4.2 Information responsive to the request is contained in the Direct Testimony of Eric Panfil (AT&T Ill. Ex. 5.0), pp. 11-22 and Schedules ELP-3 and ELP-4 and the Direct Testimony of Dr. William Taylor (AT&T Ill. Ex. 3.0), pp. 50-54. The requested studies and work papers are included on a computer CD that is being provided to the Commission Staff concurrently with the filing of this Response. That CD will be made available upon request to the Administrative Law Judge and parties which execute a Proprietary Agreement.

4.3 The results of the LRSIC studies for the services at issue in this proceeding are provided in the Direct Testimony and schedules of David Barch (AT&T Ill. Ex. 6.0). All cost models and studies used in the derivation of the LRSICs are included on a computer CD that is being provided to the Commission Staff concurrently with the filing of this Response. That CD will be made available upon request to the Administrative Law Judge and parties which execute a Proprietary Agreement.

4.4 Information responsive to the request is contained in the Direct Testimony of Eric Panfil (AT&T Ill. Ex. 5.0), pp. 26-27 and Schedule ELP-5. Detailed calculations are included on a computer CD that is being provided to the Commission Staff concurrently with the filing of this Response. That CD will be made available upon request to the Administrative Law Judge and parties which execute a Proprietary Agreement.

VERIFICATION

I, W. Karl Wardin, on oath, state that I am Executive Director-Local Competition for AT&T Illinois, that I have reviewed the foregoing **VERTIFIED RESPONSES OF AT&T ILLINOIS TO COMMISSION REQUEST FOR INFORMATION**, and that, to the best of my knowledge, information and belief, the statements contained therein are true and correct.


W. Karl Wardin

Subscribed and sworn to before
me this 20th day of January, 2006


Notary Public, State of Illinois

