



**David C. Blessing**

**Principal**

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**Telecommunications  
and  
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Regulatory and  
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**Education**

MA in Economics from  
Fordham University  
New York, New York

BA in Liberal Arts from  
Kalamazoo College  
Kalamazoo, Michigan

David Blessing is a founding Principal of Parrish, Blessing & Associates, Inc., working mainly in the firm's Telecommunications Economic Consulting practice. Mr. Blessing heads the firm's efforts related to economic analysis, cost modeling and telecommunications rate development.

**Background**

Dave is a twenty two-year veteran of the telecommunications industry and has extensive experience as a telecom employee and consultant in the areas of cost modeling, rate design, rate development, rate structure, incentive regulation and competitive issues. Mr. Blessing, an economist and statistician, performs demand and revenue forecasts for rate-making purposes, prepares economic analyses in support of service pricing and evaluation of regulatory and corporate policies. He has testified before the FCC and several state regulatory commissions as an expert witness and prepared testimony on a wide variety of subjects including rate design, competition, productivity, cost of capital, universal service, local service cost studies, EAS, toll, alternative regulation, reciprocal compensation, interconnection, UNE TELRIC pricing, and incremental costs as related to service prices.

Most recently, Dave has focused on assisting telecom providers confront competition in the local exchange; broadband and wireless telecommunications markets. He has assisted carriers in developing broadband cost models and advocacy positions in the ongoing federal and state universal service reform efforts. Dave has worked with clients to determine network interconnection costs and prices and he has participated in negotiations and litigations concerning the development of local rates and rate structures, as well as proceedings related to interconnection and other wholesale network services. Dave has developed several cost models that have been used to develop retail and wholesale telecommunications rates adopted in numerous jurisdictions across the country. He has also assisted clients developing and pricing service bundles including regulated services and deregulated services such as wireless, DSL and broadband.

Prior to beginning his consulting career, Dave was a senior economist at Frontier Corporation (Rochester Telephone Co.) and he began his career as an assistant professor teaching economics and finance for Nazareth College. Mr. Blessing holds a Bachelor of Arts degree in Liberal Arts from Kalamazoo College, a Master of Arts degree in Economics from Fordham University and has completed all requirements towards a Ph.D. in Economics at Fordham University except for the dissertation.



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**PARRISH BLESSING EMPLOYMENT EXPERIENCE:**

**Principal (February 1993-Present)**

Founding partner in consulting firm specializing in economic and strategic analysis focused primarily on pricing, costing and rate design for network-based telecommunications services. Firm generates \$2 - \$2.5 million in annual revenues and has nine employees.

Provide Expert testimony and reports related to economic analysis and modeling, financial analysis, cost modeling, regulatory compliance and analysis for telecommunications carriers and other stake holders.

Develop empirical cost/pricing models of forward-looking economic (LRIC) prices to be included in Interconnection agreements between incumbent and competitive local exchange carriers.

Develop pricing models for retail "mixed" bundles including traditional regulated telecommunications services and deregulated services such as wireless, DSL and broadband services. Develop revenue allocation methodologies for the purpose of allocating mixed bundle revenues between regulated books of account and deregulated accounts.

Develop and empirically analyze rate structure proposals that better reflect current market conditions and cost causation. Assist carrier clients in managing the transition from traditional tariff-based rate structures to negotiate with clients and regulators concerning changes to rate structures and rates.

Analyze impacts of proposed Universal Service policies; assist clients in develop cohesive proposals and/or comments reflective of statutory requirements and stated public policy goals.

Develop specialized models for microcomputer applications to aid clients in the evaluation of regulatory policy options. Assist in tailoring these evaluations to current and prospective market conditions.

**KLICK, KENT & ALLEN EMPLOYMENT EXPERIENCE:**

**Consultant (June 1991-February 1993)**

Responsible for business development, client relations and project management. Developed and supervised various technical and strategic analyses for telecommunications firms and the United States Postal Service.

Developed and presented expert testimony and econometric estimates of demand response and revenue restriction for local exchange carriers in state rate proceedings.

Evaluated client analyses of productivity and rate design prior to submission in regulatory proceedings.

## **ROCHESTER TELEPHONE EMPLOYMENT EXPERIENCE:**

### **Senior Economist (Jan 1988-Jun 1991)**

Responsible for the development of economic analysis and policy positions for the corporation. Presented expert testimony before state and federal commissions, developed internal analyses including revenue forecasts, productivity studies, market analyses and rate design studies. Worked with senior management to develop corporate positions and policy statements.

Responsible for the management of the company's transition from rate of return regulation to incentive regulation under the FCC's price cap regulation rules. Developed guidelines for incorporating incentives into the company's revenue generation and cost allocation procedures. Developed rate design criteria used to restructure rates in such a way as to maximize competitive position.

Participated in settlement negotiations with the New York Public Service Commission staff regarding incentive regulation, revenue, rate design, productivity and royalty (positive benefit).

Chaired the United States Telephone Association (USTA) Midsize Company Price Cap Refinement Subgroup which developed proposals for FCC price cap refinements, secured industry consensus, and lobbied the FCC for their adoption.

Analyzed the financial ramifications of price cap regulation and provided company financial targets. Analysis showed that interstate price caps would save \$1.5 million annually for both consumers and the company by promoting rate reducing efficiencies simultaneously with allowing higher returns.

## **NAZARETH COLLEGE OF ROCHESTER EMPLOYMENT EXPERIENCE:**

### **Assistant Professor – Department of Business (1986-1988):**

Tenure track position teaching undergraduate economics and finance course.

## **FORDHAM UNIVERSITY EMPLOYMENT EXPERIENCE:**

### **Research and Teaching Assistant, Department of Economics (1982-1984)**

Researched economic literature and analyzed economic data in support of graduate faculty research and publication efforts.

Taught courses in Statistics I and II to undergraduates in the College of Business.

## **CONTROL DATA CORPORATION EMPLOYMENT EXPERIENCE:**

### **Credit Analyst (1980-1982)**

Set credit lines and managed a \$15 million receivables portfolio; regulated all customer shipments; and collected large past due balances.

## **EDUCATION:**

B.A. Liberal Arts, Kalamazoo College, Kalamazoo, Michigan; 1980

M.A. Economics, Fordham University, New York, New York; 1983

Completed all requirements towards Ph.D. in Economics except dissertation at Fordham University.

## **Expert Testimony**

### **Before the Federal Communications Commission:**

*In the Matter of Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251(c)(3) and 252(d)(1) in the Anchorage LEC Study Area, WC 05-281. Initial Statement Filed September 30, 2005. Reply Statement Filed February 23, 2006.*

*In the Matter of Federal-State Joint Board on Universal Service, High Cost Universal Service Support, CC Docket No. 96-45, WC Docket No. 05-337, Declaration of David C. Blessing, March 27, 2006.*

### **Before the International Center for Dispute Resolution:**

*WorldNet Telecommunications, Inc. v. Puerto Rico Telephone Company, Inc., WorldNet Telecommunications, Inc.'s Pre-Hearing Brief, Case No. 50 494 T 00296 06. Expert Report November 2006.*

### **Before the Regulatory Commission of Alaska:**

*In the Matter of the Investigation of the Local Exchange Revenue Requirement, Depreciation, Cost of Service and Rate Design Studies Filed by ACS of Anchorage, Inc. d/b/a Alaska Communications Systems, ACS Local Service and ACS, Case U-01-34. August 2001.*

*In the Matter of the Investigation of the Local Exchange Revenue Requirement, Depreciation, Cost of Service and Rate Design Studies Filed by ACS of Fairbanks, Inc. d/b/a Alaska Communications Systems, ACS Local Service and ACS, Case U-01-83. Expert Testimony on the Appropriate Cost of Capital, August 2001.*

*In the Matter of the Investigation of the Local Exchange Revenue Requirement, Depreciation, Cost of Service and Rate Design Studies Filed by ACS of Alaska, Inc. d/b/a Alaska Communications Systems, ACS Local Service and ACS, Case U-01-85. Testimony on the Appropriate Cost of Capital, August 2001.*

*In the Matter of the Investigation of the Local Exchange Revenue Requirement, Depreciation, Cost of Service and Rate Design Studies Filed by ACS of the Northland, Inc. d/b/a Alaska Communications Systems, ACS Local Service and ACS, Case U-01-87. August 2001.*

*In the Matter of the Petition by GCI Communications Corp. d/b/a General Communication, Inc., and d/b/a GCI for Arbitration under Section 252 of the Telecommunications Act of 1996 with the Municipality of Anchorage d/b/a Anchorage Telephone Utility a/k/a ATU Telecommunications for the Purpose of Instituting Local Exchange Competition. Case U-96-89. Expert Testimony, February 2002 and August 2003. Final Hearing: November 2003*

*In the Matter of the Petition by GCI Communications Corp. d/b/a General Communication, Inc., and d/b/a GCI for Termination of Rural Exemption and Arbitration with PTI Communications of Alaska Inc, under 47 U.S.C. §§ 251 and 252 of the Purpose of Instituting Local Exchange Competition. Case U-97-82. Expert Testimony, March 2004.*

*In the Matter of the Petition by GCI Communications Corp. d/b/a General Communication, Inc., and d/b/a GCI for Termination of Rural Exemption and Arbitration with Telephone Utilities of Alaska Inc, under 47 U.S.C. §§ 251 and 252 of the Purpose of Instituting Local Exchange Competition. Cases U-97-82 and U-97-143. Expert Testimony, March 2004.*

**Before the Arkansas Public Service Commission:**

*In the Matter of Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, L.P. d/b/a SBC Arkansas to Set Rates for Unbundled Network Elements, CC Docket No. 04-109-U, Expert Reply Testimony, May 27, 2005.*

**Before the Georgia Public Service Commission:**

*Universal Access Fund, Transition to Phase II under O.C.G.A. Section 46-5-167, Docket No.5825-U, Expert Testimony, July 2000.*

**Before the State Corporation Commission of Kansas:**

*In the Matter of an Audit and General Rate Investigation of S&A Telephone Company, Docket No. 03-S&AT-160-AUD, Expert Testimony, March 2003.*

**Before the Public Service Commission of the Commonwealth of Kentucky:**

*In the Matter of an Inquiry into the Development of De-Averaged Rates for Unbundled Network Elements, Adm. Case No. 382, Expert Rebuttal Testimony, January 28, 2005.*

*In the Matter of the petition of Windstream Kentucky East, LLC for Arbitration of an Interconnection Agreement with New Cingular Wireless PCS, LLC D/B/A AT&T Mobility Pursuant to Section 252 of the Telecommunications Act of 1996, Docket No. 2009-00246.*

**Before the Public Service Commission State of Missouri:**

*In the Matter of an Investigation into Various Issues Related to the Missouri Universal Service, Case 98-329, Expert Testimony, August 2001.*

**Before the Nebraska Public Service Commission:**

*In the Matter of the Petition of Nebraska Technology and Telecommunications, Inc., for arbitration of interconnection rates, terms and conditions with Aliant Communications Co., d/b/a ALLTEL, Application No. C-2648, Expert Testimony, July 2002.*

*In the Matter of the Petition of Nebraska Technology & Telecommunications, Inc. for Arbitration of an Interconnection Agreement with Windstream Nebraska, Inc. Pursuant to Section 252 of the Telecommunications Act of 1996, Docket No. C-3847, Unredacted Rebuttal Testimony, October 2007*

**Before the New York Public Service Commission:**

*In the Matter of the Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Rochester Telephone Corporation, Case 89-C-022. Expert Testimony, Filed February 1989.*

*In the Matter of the Proceeding on Motion of The Commission as to the Rates, Charges, Rules and Regulations of Highland Telephone Company for Telephone Service, Case 91-C-0123. Expert Testimony, Filed February 1991.*

*Petition of Rochester Telephone Corporation for Approval of Proposed Restructuring Plan, Case 93-C-0103, and, Petition of Rochester Telephone Corporation for Approval of a New Multi Year Rate Stability Agreement, Case 93-C-0033, Expert Testimony, Filed February 1993.*

*Petition of Fairpoint Communications Corp. for Negotiations/Mediation Pursuant to Section 252(a)(2) of the Telecommunications Act of 1996 and for approval of any resulting interconnection Agreement, 2000, Case 99-C-1337, Expert Testimony, Filed March 2000.*

**Before the Public Utilities Commission of Ohio:**

*In the Matter of the Application of Ohiotelnet.com, Inc.'s Petition for Arbitration of Interconnection Rates, Terms and Conditions and Related Arrangements with ALLTEL Ohio, Inc., Case No. 00-1601-TP-ARB, Expert Testimony, 2000.*

*In the Matter of the Application of Ameritech Communications Services, Inc.'s Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with the Western Reserve Telephone Company, Case No. 01-31-TP-ARB, Expert Testimony, 2001.*

**Before the Pennsylvania Public Utility Commission:**

*Pennsylvania Public Utility Commission, et al, Vs. Enterprise Telephone Company -- General Rate Proceeding, Case R-922317. Expert Testimony, Filed April 1992.*

*Joint Petition of Breezewood Telephone Company, Canton Telephone Company, Enterprise Telephone Company, Lakewood Telephone Company and Oswayo River Telephone Company for a Streamlined Form of Regulation and Plan for Network Modernization, Case P-00940754. Expert Testimony, Filed January 1994.*

*Petition of the Pennsylvania Telephone Association Small Company Group for Approval of an Alternate and Streamlined Form of Regulation and Network Modernization Plans, Docket No. P-00981425 et al, Expert Testimony, Filed July 31, 1998.*

*Petition of ALLTEL Pennsylvania, Inc. For Approval of an Alternate and Streamlined Form of Regulation and Network Modernization Plans, Docket No. P-00981423, Expert Testimony, Filed July 31, 1998.*

**Before the Telecommunications Regulatory Board of Puerto Rico:**

*In re: Centennial Communications Corporation: Arbitration Petition Based on 47 USC 252(b), Chap. III, Art. 5(b) of the Puerto Rico Telecommunications Act of 1996, and on Tariffs, Terms and Conditions, Expert Testimony, 1997.*

*In re: Lambda Communications Corporation: Arbitration Petition Based on 47 USC 252(b), Chap. III, Art. 5(b) of the Puerto Rico Telecommunications Act of 1996, and on Tariffs, Terms and Conditions, Expert Testimony, 1997.*

*In re: Cellpage Communications: Arbitration Petition Based on 47 USC 252(b), Chap. III, Art. 5(b) of the Puerto Rico Telecommunications Act of 1996, and on Tariffs, Terms and Conditions, Expert Testimony, 1997.*

*Lambda Communications, Inc., Sprint International Caribe, Inc. v. Puerto Rico Telephone Company, Defendant, Re: Suspension of PRTC's Intraisland Long Distance Tariff ("Your Answer Plan") and Requiring the Imputation of Costs Against PRTC, Case No. JRT-99-Q-0080, Expert Testimony, February 2000.*

*Telefonica Larga Distancia de Puerto Rico, Inc., Plaintiff, v. Puerto Rico Telephone Company, Re: Puerto Rico Telephone Company Tariff K-2, Case No. 97-Q-0001, 97-Q-0003, Expert Testimony, Phase 1: April 2000, Phase 2: May 2001.*

*In re: RSV TELECOM, INC. Petition for Arbitration Pursuant to Section 47 U.S.C. 252(b) of the Federal Communications Act and Article 5(b), Chapter III, of the Puerto Rico Telecommunications Act – Interconnection Rates, Terms and Conditions, Case No. JRT-2000-AR-0001, Expert Testimony, May 2000.*

*International Telecom Ltd., Complainant v. Puerto Rico Telephone Company, Defendant, Breach of Contract and Request for Declaratory Ruling, Case No. JRT-00-Q-0014, Expert Testimony, May 2001.*

*In the Matter of Arbitration of Interconnection Rates, Terms and Conditions between WorldNet Telecommunications Inc. and the Puerto Rico Telephone Company, Re: Petition for Interconnection, Case No. JRT-2001-AR-0002, Expert Testimony, November 2001.*

*In the Matter of Arbitration of Interconnection Rates, Terms and Conditions between Newcomm Wireless Services, Inc., and Puerto Rico Telephone Company, Re: Interconnection Arbitration, Case No. JRT-2002-AR-0001, Expert Testimony, April 2002.*

*Petition of Centennial Puerto Rico License Corporation for Arbitration Pursuant to Section 47 U.S.C. 252(b) of the Federal Communications Act of 1996 to Establish an Interconnection Agreement with Puerto Rico Telephone Company, Case No. JRT-2002-AR-0002, Expert Testimony, May 2002.*

*Re: Expansion of the Local Service Zones of the Puerto Rico Telephone Company, Inc., Case No. JRT-2004-CCG-0001, Expert Testimony, March – April 2004; June 2004.*

*Telefonica Larga Distancia De Puerto Rico, Inc., WorldNet Telecommunications, Inc., Sprint Communications Company, LP, and AT&T of Puerto Rico, Inc., Plaintiffs, v. Puerto Rico Telephone Company, Inc., Defendant. Case No.'s JRT-2005-Q-0121, JRT-2005-Q-0128, JRT-2005-Q-0297, and JRT-2004-Q-0068. Expert Testimony, August 2005.*

*Telefónica Larga Distancia De Puerto Rico, Inc., Worldnet Telecommunications, Inc., Sprint Communications Company, Lp, And At&T of Puerto Rico, Inc., v. Puerto Rico Telephone Company, Case No.s JRT-2005-Q-0121, JRT-2005-Q-0128, JRT-2005-Q-0297, JRT-2005-Q0068, Rate Restructure, Expert Testimony 2005-2006.*

*In the Matter of Arbitration of Interconnection Rates, Terms and Conditions between Telefonica Larga Distancias, Inc., and Puerto Rico Telephone Company, Re: Interconnection Arbitration, Case No. JRT-2006-AR-0001, Expert Testimony, January 2007.*

*In the Matter of WorldNet De Puerto Rico, Inc., Petition for Arbitration Pursuant to Section 47 U.S.C. 252(b) of the Federal Communications Act and Section 5(b), Chapter III, of the Puerto Rico Telecommunications Act, Regarding Interconnection Rates, Terms and Conditions with Puerto Rico Telephone Company, Case No. JRT-2006-AR-\_\_\_\_. Direct Testimony, May 2007. First Reply, Testimony May 2007. Second Reply, Testimony May 2007.*

*In the Matter of WorldNet Telecommunications, Inc., Petition for Arbitration Pursuant to Section 47 U.S.C.252(b) of the Federal Communications Act and Section 5(b), Chapter III, of the Puerto Rico Telecommunications Act, Regarding Interconnection Rates, Terms and Conditions with Puerto Rico Telephone Company. Case No. JRT-2007-AR-0001. Public Version Testimony, April 2008.*

*Petition of Centennial Puerto Rico License Corp. for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Puerto Rico Telephone Company, Case No. JRT-2008-AR-0001. Direct Testimony, July 2008.*

*In the Matter of WorldNet Telecommunications, Inc., Petition for Arbitration Pursuant to Section 47 U.S.C.252(b) of the Federal Communications Act and Section 5(b), Chapter III, of the Puerto Rico Telecommunications Act, Regarding Interconnection Rates, Terms and Conditions with Puerto Rico Telephone Company, Case No. JRT-2010-AR-0001. Public Version Direct Testimony, June 2010. Reply Testimony, July 2010.*

**In The United States District Court for the District of Puerto Rico:**

*Telefonos Publicos de Puerto Rico, Inc. Plaintiff v. Puerto Rico Telephone Company, Defendant, Civil Action 01-2519 GG, Expert Report, October 2004.*

**Before the Texas State Office of Administrative Hearings:**

*Application of Texas ALLTEL, Inc., to Recover Lost Revenues and Costs of Implementing Expanded Local Calling Service Pursuant to P.U.C. Subst. R. 23.49(c)(12). SOAH Docket No. 473-98-0403, PUC Docket No. 17641, Expert Testimony, June 1998.*

**Before the Public Service Commission of the United States Virgin Islands:**

*In Re: Investigation of Rates of Virgin Islands Telephone Corporation D/B/A Innovative Communications, PSC Docket No. 578, Expert Testimony, September 2008. Reply Testimony, October 2008.*

**Before the Public Service Commission of Wisconsin:**

*In the Matter of the Application of CenturyTel of the Midwest-Kendall, Inc. for Rate Increase and Petition for Emergency Order for Rate Increase, Docket 2815-TR-103, Expert Testimony, April 2000.*