

BEFORE THE ILLINOIS COMMERCE COMMISSION

In the matter of)
Concentric Carrier Services, Inc.)
Application for a Certificate of Local Exchange)
and Interexchange Authority to Operate as a)
Reseller and Facilities-based Carrier of)
Telecommunications Services throughout)
the State of Illinois)

Docket No. 00-0049

TESTIMONY OF NICOLE SOMMERFELD ON BEHALF OF CONCENTRIC CARRIER SERVICES, INC.

OFFICIAL FILE
I.C.C. DOCKET NO. 00-0049
Applicant's Exhibit No. 1
Witness Date 3/10/00 Reporter [Signature]

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Nicole Sommerfeld. My business address is 1400 Parkmoor Avenue, San Jose,
3 CA 95126. My business telephone number is (408) 817-2479 and my business fax number
4 is (408) 817-2299.

5 Q. WHAT IS YOUR POSITION WITH APPLICANT?

6 A. I am a Business Development Manager for Concentric Network Corporation, the parent
7 company of the Applicant Concentric Carrier Services, Inc.

8 Q. PLEASE BRIEFLY DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS.

9 A. I have worked for Concentric Network Corporation since August 1999 as a Business
10 Development Manager. Prior to working at Concentric Network Corporation, I worked in
11 New Zealand for eight years for CLEAR Communications, a telecommunications and

1 Internet services provider company, where I held senior marketing roles. Prior to CLEAR
2 Communications, I worked for one year as a marketing assistant at Pacific Bell. My current
3 responsibilities at Concentric Network Corporation include coordinating certification and
4 regulatory affairs for its wholly-owned subsidiary, Concentric Carrier Services, Inc.

5 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE ILLINOIS COMMERCE**
6 **COMMISSION ("COMMISSION")?**

7 A. No.

8 **Q. ARE YOU FAMILIAR WITH THE APPLICATION THAT CONCENTRIC**
9 **CARRIER SERVICES, INC. FILED WITH THE ILLINOIS COMMERCE**
10 **COMMISSION ON JANUARY 20, 2000 FOR A CERTIFICATE TO BECOME**
11 **A TELECOMMUNICATIONS CARRIER WITHIN THE STATE OF ILLINOIS?**

12 A. Yes.

13 **Q. DO YOU RATIFY AND CONFIRM THE STATEMENTS THAT ARE MADE IN**
14 **THE APPLICATION?**

15 A. Yes. However, I would like to inform the Commission of certain updated information. I
16 would like to inform the Commission that Concentric Carrier Services recently received
17 authority to provide facilities-based and resold local exchange services in Colorado, the
18 District of Columbia, Texas, and Washington. Concentric Carrier Services has also received
19 authority to provide interexchange services in Indiana. However, Concentric has not yet
20 commenced service in any of these jurisdictions. Concentric is also in the process of
21 applying for authority to provide telecommunications services nationwide. I would also like
22 to inform the Commission of updated information concerning the ownership interests held
23 by the officers of Concentric Carrier Services in other entities providing telecommunications

1 services. Specifically, the officers of Concentric Carrier Services have the following
2 ownership interests in Concentric Network Corporation, the parent company of the
3 Applicant: Henry R. Nothhaft holds a 2.84% interest; Michael Anthofer holds a 0.81%
4 interest; Peter Bergeron holds a 0.02% interest. Finally, I would like to inform the
5 Commission that John Peters, whose biography was included as part of Attachment 3 to
6 Concentric's Application, has left Concentric as of February 1 of this year. His position has
7 been filled by James Isaacs, whose biography is also included in Attachment 3 to the
8 Application.

9 **II. PURPOSE AND SUMMARY**

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

11 A. The purpose of my testimony is to describe the local exchange services that Concentric
12 Carrier Services, Inc. ("Concentric") proposes to offer in Illinois and to review issues related
13 to Concentric's request for authority to provide such services. My testimony specifically
14 relates to Concentric's managerial, financial and technical competence to provide the local
15 exchange and interexchange telecommunications services for which authority is requested,
16 and its compliance with the rules and policies of this Commission.

17 **Q. PLEASE DESCRIBE THE AUTHORITY THAT CONCENTRIC SEEKS FROM THE**
18 **COMMISSION.**

19 A. By its Application, Concentric plans to provide resold and facilities-based local exchange,
20 interexchange and exchange access services throughout the State of Illinois. Concentric's
21 proposed local exchange services will allow its customers to originate and terminate local
22 calls to other customers served by Concentric as well as customers served by all other
23 Illinois-certificated local exchange carriers. Concentric will also provide switched access

1 services to interexchange carriers on an equal access basis, which will allow its customers
2 to originate and terminate intrastate and interstate calls to and from customers of other
3 interexchange carriers. Concentric would like to emphasize that it does not seek to terminate
4 any small or rural LEC exemption claimed by any rural incumbent LECs in Illinois at this
5 time.

6 **Q. PLEASE DESCRIBE THE OPERATIONS OF CONCENTRIC.**

7 A. Concentric is a corporation organized under the laws of the State of Delaware. Concentric's
8 Certificate of Authority to Transact Business in Illinois was provided as Attachment 2 to its
9 Application. Concentric is a wholly-owned subsidiary of Concentric Network Corporation,
10 a publicly-traded Delaware corporation listed on the NASDAQ exchange under the symbol
11 "CNCX." Concentric Network Corporation's primary business is the provision of tailored,
12 value-added IP-based network services for enterprises and consumers nationwide utilizing
13 a high-performance ATM-based network that covers North America. The services offered
14 by Concentric Network Corporation are not currently subject to state or Federal regulation.
15 As described above, Concentric Carrier Services has received authority to provide
16 telecommunications services in Colorado, the District of Columbia, Indiana, Texas, and
17 Washington, although it has not yet begun providing services in these jurisdictions. In
18 addition to Illinois, Concentric is currently seeking authorization to provide local exchange
19 and interexchange telecommunications services nationwide. Neither Concentric nor its
20 affiliates have been denied authority to provide telecommunications services in any state.

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1 **III. MANAGERIAL, TECHNICAL AND FINANCIAL QUALIFICATIONS**

2 **Q. PLEASE OUTLINE CONCENTRIC'S MANAGERIAL, TECHNICAL AND**
3 **FINANCIAL QUALIFICATIONS.**

4 A. Concentric is managerially, technically and financially qualified to provide the proposed
5 services. Concentric will be able to rely on the extensive resources of its parent company,
6 Concentric Network Corporation. Descriptions of the managerial and technical experience
7 of Concentric's key personnel are attached as Attachment 3 to Concentric's Application. As
8 indicated in Attachment 3 to the Application, these personnel have extensive experience in
9 the telecommunications industry.

10 **Q. IN YOUR OPINION, DOES CONCENTRIC HAVE ADEQUATE ACCESS TO THE**
11 **CAPITAL NECESSARY TO PROVIDE THE PROPOSED SERVICES IN ILLINOIS?**

12 A. Yes, it does. Concentric has access to the financing and working capital necessary to fulfill
13 any obligations it may undertake with respect to operation and maintenance of the operations
14 specified in its Application. Specifically, Concentric will rely upon the substantial financial
15 resources of its parent, Concentric Network Corporation, to provide the initial capital
16 investment and to fund operating costs. As of September 30, 1999, Concentric Network
17 Corporation's total assets were valued at over \$456 million, with quarterly revenue for the
18 quarter ending September 30 of \$38.1 million. Attached to Concentric's Application as
19 Attachment 4 are copies of Concentric Network Corporation's most recent SEC Form 10-K
20 and 10-Q filings. Attached to this testimony as Exhibit A is a guaranty from Concentric
21 Network Corporation ensuring that the Applicant will have access to these resources. With
22 the resources of Concentric Network Corporation, the Applicant possesses the sound
23 financial support necessary to effectively procure, install and operate the facilities and

1 services requested in this petition. Further, as we noted in our Application, on January 10,
2 2000, the Applicant's parent company, Concentric Network Corporation, announced that it
3 has entered into a definitive agreement for the combination of itself and Nextlink
4 Communications, Inc. ("Nextlink"), creating a next-generation broadband communications
5 company that will provide a full range of voice, data and Internet communications services.
6 The transaction, valued at approximately \$2.9 billion, is expected to close in the second
7 quarter of this year. In the transaction, each share of Concentric Network Corporation
8 common stock will be exchanged for \$45.00 of Nextlink common stock.

9 **IV. CONCENTRIC'S PROPOSED SERVICES**

10 **Q. PLEASE DESCRIBE THE TYPES OF SERVICES THAT CONCENTRIC PLANS**
11 **TO OFFER IN ILLINOIS.**

12 A. Concentric plans to offer local exchange services to businesses and residential customers
13 located throughout Illinois. Exchange services will include, but will not be limited to the
14 following: (i) local exchange access services to single line and multi-line customers
15 (including basic residential and business lines, direct inward/outward PBX trunk service,
16 Centrex services and ISDN); (ii) local exchange usage services to customers of Applicant's
17 end user access line services; (iii) switched and special carrier access services to other
18 common carriers on an equal access basis; and (iv) xDSL and other private line services. In
19 addition, Applicant seeks authority, through interconnection with other carriers, to offer 9-1-
20 1 and enhanced 9-1-1 emergency services, directory assistance and operator assisted calling,
21 dual party relay services, and other miscellaneous services currently provided by incumbent
22 local exchange carriers. Concentric also intends to offer interexchange services, including
23 both inbound and outbound IntraLATA and InterLATA services. This will be accomplished

1 through a combination of its own facilities and other carriers' services. Where Concentric
2 proposes to offer xDSL services, it will do so primarily over its own facilities. These
3 facilities will include unbundled local loops and Digital Subscriber Line Access Multiplexers
4 ("DSLAMS"), which will be installed in incumbent LEC central offices. For all other
5 services, Concentric initially will offer services to its subscribers through the resale of other
6 carriers' facilities and network elements. In the future, Concentric may also construct its
7 own facilities for these services where warranted, the selection of which would be based
8 upon Concentric's analysis of facility cost, suitability, and quality of service. At such time
9 as Concentric may plan to construct its own facilities, it will comply with the Commission's
10 requirements and all other relevant regulations.

11 **Q. HOW DOES YOUR COMPANY PLAN TO SOLICIT CUSTOMERS ONCE IT**
12 **BEGINS TO PROVIDE LOCAL SERVICE?**

13 A. Services may be marketed via Internet web advertising, direct mail or through a direct sales
14 force trained by Concentric. Concentric does not intend to use any multi-level marketing or
15 charity programs.

16 **Q. WHO WILL PROVIDE CUSTOMER REPAIR SERVICE FOR YOUR COMPANY?**

17 A. Concentric customers may call Concentric's customer service number, (800) 745-2747, 24
18 hours a day, seven days a week for routine and emergency repair and maintenance. If the
19 repair or maintenance request concerns a resold or UNE portion of Concentric's network,
20 Concentric will contact the underlying carrier. If the repair or maintenance request concerns
21 a Concentric-owned facility, such as a switch, Concentric will handle the repair or
22 maintenance through a subcontractor.

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1 Q. PLEASE PROVIDE THE NAME, ADDRESS, TELEPHONE, AND FAX NUMBER
2 OF THE PERSON AT YOUR COMPANY THAT WILL BE RESPONSIBLE FOR
3 WORKING WITH THE COMMISSION'S CONSUMER SERVICES DIVISION FOR
4 COMPLAINT RESOLUTION.

5 A. I will be the person responsible for working with the Consumer Services Division concerning
6 complaint resolution. My business address, telephone, and fax number have been provided
7 above.

8 Q. DOES YOUR COMPANY PLAN TO OBTAIN ELIGIBLE
9 TELECOMMUNICATIONS CARRIER STATUS TO QUALIFY FOR THE
10 FEDERALLY FUNDED LIFELINE AND LINK UP PROGRAMS?

11 A. At this time, Concentric does not intend to seek designation as an Eligible
12 Telecommunications Carrier.

13 V. COMPLIANCE WITH THE COMMISSION'S RULES, REGULATIONS AND
14 POLICIES

15 Q. IF AUTHORIZED TO PROVIDE LOCAL EXCHANGE SERVICES, WILL
16 CONCENTRIC ABIDE BY THE RULES, REGULATIONS, POLICIES AND
17 ORDERS OF THIS COMMISSION, AND THE LAWS OF THE STATE OF
18 ILLINOIS, IN ITS PROVISION OF LOCAL EXCHANGE
19 TELECOMMUNICATIONS SERVICE?

20 A. Yes we will. Concentric will provide service in Illinois in full compliance with any and all
21 rules and regulations that have been or may be adopted relating to the provision of local
22 exchange or interexchange services, as well as any other applicable state or federal rules,
23 regulations, or statutes. For example, Concentric will comply with any competitively-neutral

1 requirements that the Commission and/or the State of Illinois determines are necessary to
2 preserve and advance universal service, protect the public safety and welfare, ensure the
3 continued quality of local services, and safeguard the rights of consumers.

4 **Q. IS YOUR COMPANY SEEKING ANY WAIVERS OR VARIANCES OF CERTAIN**
5 **COMMISSION RULES OR REGULATIONS IN THIS PROCEEDING THAT**
6 **PERTAIN TO LOCAL EXCHANGE SERVICE?**

7 A. Yes, it is. Specifically, Concentric is requesting waivers of the following: 83 Ill. Admin.
8 Code Part 250, 83 Ill. Admin. Code Part 710, 83 Ill. Admin. Code Part 735.180, and 83 Ill.
9 Admin. Code Parts 725.500(o) and 725.620(b). It is my understanding that the Commission
10 has previously waived or declared inapplicable portions of 83 Ill. Admin. Code Parts 710 and
11 735 for competitive carriers as such waivers reduce the economic burdens of regulation and
12 are not inconsistent with the law or the purposes and policies of Article XIII of the Act.

13 **Q. PLEASE DESCRIBE CONCENTRIC'S REQUEST FOR A VARIANCE FROM 83**
14 **ILL. ADMIN. CODE PART 250.**

15 A. Concentric seeks a variance of Part 250 that would require Concentric to maintain its books
16 and records within the State of Illinois due to the economic and administrative burden that
17 such a requirement would impose. Concentric therefore requests that it be allowed to
18 maintain its books and records at its principal place of business, with such books and records
19 to be available to the Commission upon reasonable demand.

20 **Q. PLEASE DISCUSS THE BASIS FOR CONCENTRIC'S REQUEST FOR A WAIVER**
21 **OF 83 ILL. ADMIN. CODE PART 710.**

22 A. Part 710 requires compliance with the Uniform System of Accounts ("USOA"). While this
23 provision is appropriately applied to incumbent LECs that have market power, it imposes

1 unnecessary and burdensome requirements on new entrants such as Concentric. Concentric's
2 size and lack of market power are special circumstances that warrant a waiver of the USOA
3 requirement. Concentric keeps its books in accordance with Generally Accepted Accounting
4 Principles, which will result in a substantially equivalent portrayal of its operating results and
5 financial condition. In compliance with requirements for seeking this waiver, Concentric is
6 attaching a copy of its Chart of Accounts as Exhibit B to this testimony.

7 **Q. PLEASE DESCRIBE CONCENTRIC'S REQUEST FOR A VARIANCE FROM ILL.**
8 **ADMIN. CODE PART 735.180.**

9 A. Concentric seeks a variance from Ill. Admin. Code Part 735.180, which requires LECs to
10 publish and distribute directories to their customers. Concentric plans to negotiate an
11 agreement with its underlying carrier(s), Ameritech Illinois and/or other local exchange
12 providers, pursuant to which the underlying carrier will include Concentric's customer listing
13 in its directories and distribute them to Concentric's customers. Accordingly, Concentric
14 requests a variance from the requirement that it publish and distribute its own directories.

15 **Q. PLEASE DESCRIBE CONCENTRIC'S REQUEST FOR A WAIVER OF 83 ILL.**
16 **ADMIN. CODE PARTS 725.500(O) AND 725.620(B).**

17 A. Concentric requests a waiver of 83 Ill. Admin. Code Parts 725.500(o) and 725.620(b), which
18 require that call boxes be installed on a LEC's switch in order to allow a Public Safety
19 Answering Position ("PSAP") employee to field 9-1-1 calls from that switch in the event of
20 a trunking problem between the central office and the PSAP. This requirement is appropriate
21 when applied to incumbent LECs, who have switching equipment installed in virtually every
22 one of their central offices. It would be technically infeasible and logistically impossible for
23 a PSAP employee to field calls from Concentric's switch in the event of a trunking problem

1 between Concentric and the tandem through which Concentric will route 9-1-1 calls.
2 Therefore, Concentric requests that it be exempted from complying with this requirement.
3 Concentric nevertheless will ensure that it can process all emergency calls with a high degree
4 of reliability. It is Concentric's understanding that this waiver request has been granted to
5 other CLECs previously.

6 **Q. PLEASE EXPLAIN HOW CONCENTRIC WILL PROVIDE 9-1-1 AND OTHER**
7 **EMERGENCY SERVICES.**

8 A. Concentric intends to provide full support for emergency services in keeping with its
9 obligations as a local exchange carrier. Concentric will comply with all requirements for
10 these services applicable to authorized local exchange carriers, including the requirements
11 of 83 Ill. Admin. Code Part 725 (except for the call box waiver requested above) and the
12 Emergency Telephone System Act. Concentric will negotiate an E9-1-1/9-1-1
13 interconnection arrangement with the incumbent LECs that will allow it to complete 9-1-1
14 calls for its customers. Concentric will coordinate with the agency operating the Public
15 Service Answering Point ("PSAP") in each locality that it serves, in order to assure that 9-1-1
16 calls are routed and delivered in the manner desired by the PSAP. In those localities where
17 E9-1-1 service has been implemented, Concentric also will make arrangements for the proper
18 delivery of Automatic Number Identification ("ANI") and Automatic Location Identification
19 ("ALI") information to the PSAP. Concentric will also provide emergency operator services
20 where the caller dials only 0 at no charge to callers, customers, or the emergency service
21 providers.

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1 Q. PLEASE PROVIDE THE NAME, ADDRESS, TELEPHONE, AND FAX NUMBER
2 OF THE 9-1-1 CONTACT PERSON FOR YOUR COMPANY.

3 A. I will be the 9-1-1 contact person for Concentric. My business address, telephone, and fax
4 number have been provided above.

5 Q. HOW OFTEN WILL YOUR COMPANY UPDATE THE 9-1-1 DATABASE WITH
6 CUSTOMER INFORMATION?

7 A. Concentric will update the 9-1-1 database on a monthly basis.

8 Q. WILL YOUR COMPANY'S BILLING SYSTEM HAVE THE ABILITY TO
9 DISTINGUISH BETWEEN FACILITIES BASED AND RESALE FOR THE
10 COLLECTION OF THE 9-1-1 SURCHARGE AND ITAC LINE CHARGE?

11 A. Yes. Concentric's billing system can differentiate between facilities-based and resale for the
12 collection of the 9-1-1 surcharge and the Illinois Telecommunications Access Corporation
13 line charge.

14 Q. WILL YOUR COMPANY'S PROPOSAL REQUIRE ANY NETWORK CHANGES
15 TO ANY OF THE 9-1-1 SYSTEMS?

16 A. No.

17 Q. WILL YOUR COMPANY COMPLY WITH 83 ILL. ADMIN. CODE PART 772, PAY-
18 PER-CALL SERVICES, INCLUDING PART 772.55(A)(1), BILLING AND PART
19 772.100(D) NOTICES?

20 A. Concentric has no plans to provide local pay-per-call services at this time.

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1 Q. WILL YOUR COMPANY COMPLY WITH 83 ILL. ADMIN. CODE PART 705,
2 PRESERVATION OF RECORDS OF TELEPHONE UTILITIES?

3 A. Yes. Concentric will comply with the regulations imposed on LECs concerning the
4 preservation of records. However, as described above, Concentric requests permission to
5 maintain its books and records at its principal place of business in the State of California.

6 Q. WILL YOUR COMPANY ABIDE BY 83 ILL. ADMIN. CODE PART 735,
7 "PROCEDURES GOVERNING THE ESTABLISHMENT OF CREDIT, BILLING,
8 DEPOSITS, TERMINATION OF SERVICE AND ISSUANCE OF TELEPHONE
9 DIRECTORIES FOR TELEPHONE UTILITIES IN THE STATE OF ILLINOIS"?

10 A. Yes. However, as described above, Concentric requests a waiver with regard to the issuance
11 of telephone directories.

12 Q. WILL YOUR COMPANY MEET THE REQUIREMENTS AS THEY PERTAIN TO
13 THE TELEPHONE ASSISTANCE PROGRAMS IMPOSED BY SECTIONS 13.301
14 AND 13.301.1 OF THE ILLINOIS PUBLIC UTILITIES ACT AND 83 ILL. ADMIN.
15 CODE PART 757?

16 A. Yes, Concentric will participate with Illinois telephone assistance programs.

17 Q. WILL YOUR COMPANY SOLICIT, COLLECT, AND REMIT THE VOLUNTARY
18 CONTRIBUTIONS FROM ITS TELEPHONE SUBSCRIBERS TO SUPPORT THE
19 TELEPHONE ASSISTANCE PROGRAMS?

20 A. Yes.

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1 Q. WILL YOUR COMPANY ABIDE BY THE REGULATIONS AS PRESCRIBED IN
2 83 ILL. ADMIN. CODE PART 755, "TELECOMMUNICATIONS ACCESS FOR
3 PERSONS WITH DISABILITIES," 83 ILL. ADMIN. CODE PART 756
4 "TELECOMMUNICATIONS RELAY SERVICE," AND SECTIONS 13-703 OF THE
5 ILLINOIS PUBLIC UTILITIES ACT?

6 A. Yes.

7 Q. WILL CONCENTRIC FILE TARIFFS FOR ALL SERVICES AND CHARGES
8 ASSOCIATED WITH PROVIDING LOCAL TELEPHONE SERVICE, INCLUDING
9 SPECIFIC PROGRAMS, E.G., 9-1-1, UTAC, AND ITAC?

10 A. Yes. Concentric will file a local exchange tariff after certification and prior to the initiation
11 of local exchange service in Illinois. The tariff will set forth provisions for all of its local
12 service offerings, including 9-1-1, UTAC, and ITAC.

13 Q. THE COMMISSION'S CONSUMER SERVICES DIVISION REQUESTS THAT
14 CARRIERS THAT ARE CERTIFIED TO PROVIDE LOCAL EXCHANGE
15 SERVICE NOTIFY THE DIVISION AT LEAST ONE MONTH PRIOR TO THE
16 ACTIVATION OF LOCAL EXCHANGE SERVICE. WILL CONCENTRIC SO
17 NOTIFY THE DIVISION ON A TIMELY BASIS PRIOR TO THE ACTIVATION OF
18 LOCAL EXCHANGE SERVICE?

19 A. Yes. it will.

20 Q. WILL CONCENTRIC ABIDE BY FEDERAL AND STATE SLAMMING LAWS?

21 A. Yes. Concentric will comply with Illinois law and the Federal Communication
22 Commission's regulations regarding how interexchange carriers may change a consumer's
23 Primary Interchange Carrier. Concentric will also comply with the FCC's regulations

1 regarding how carriers may change a consumer's primary local exchange provider.

2 **Q. HAS YOUR COMPANY PROVIDED SERVICE UNDER ANY OTHER NAME?**

3 A. No. Concentric Carrier Services is a newly-formed company and has not yet begun
4 providing services in any jurisdiction.

5 **Q. HAVE ANY COMPLAINTS OR JUDGMENTS BEEN LEVIED AGAINST THE
6 COMPANY? (INSTATE, OUT-OF-STATE, OR FCC).**

7 A. To my knowledge, no formal complaints or court judgments have been levied against the
8 company.

9 **VI. CONCLUSION**

10 **Q. PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH
11 CONCENTRIC'S PROPOSED OFFERING OF LOCAL SERVICES IN ILLINOIS.**

12 A. Grant of Concentric's Application will further the public interest by expanding the
13 availability to Illinois consumers of technologically advanced telecommunications facilities
14 and services. Concentric's network will utilize state-of-the art technology. Its presence in
15 the market will afford consumers an additional choice of local service providers. The public
16 will benefit both directly, through the use of the high-quality and reliable digital transmission
17 services to be offered by Concentric, and indirectly because the expanded presence of
18 Concentric in the market will increase the incentives for other telecommunications providers
19 to operate more efficiently, offer more innovative services, reduce their prices, and improve
20 their quality of service. Grant of this Application is therefore in the public interest because
21 it will enhance further the service options available to Illinois citizens.

22 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

23 A. Yes, it does.