

Exhibit No.:
Issue: *Billing*
Witness: *Pam Hankins*
Sponsoring Party: *CenturyTel of Missouri, LLC*
and Spectra Communications
Group, LLC d/b/a/ CenturyTel
Type of Exhibit: *Direct Testimony*
Case No.: *TC-2008-0225*
Date Testimony Prepared: *December 19, 2008*

CENTURYTEL OF MISSOURI, LLC
AND
SPECTRA COMMUNICATIONS GROUP, LLC
d/b/a CENTURYTEL

REBUTTAL TESTIMONY

OF

PAM HANKINS

CASE NO. TC-2008-0225

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Socket Telecom, LLC,)
 Complainant,)
v.)
)
CenturyTel of Missouri, LLC and)
Spectra Communications Group, LLC)
d/b/a CenturyTel,)
 Respondents.)

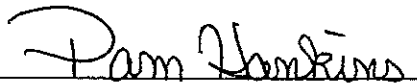
Case No. TC-2008-0225

AFFIDAVIT OF PAM HANKINS

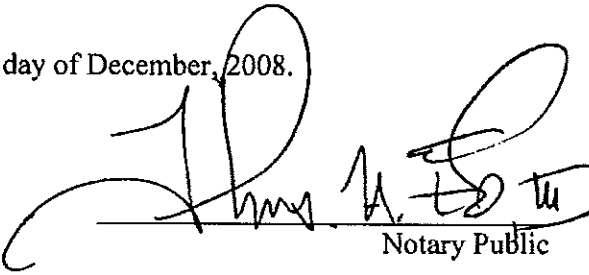
STATE OF LOUISIANA)
) SS.
PARISH OF OUACHITA)

I, **Pam Hankins**, of lawful age and being duly sworn, state as follows:

1. My name is Pam Hankins. I am presently employed by CenturyTel Service Group, LLC, as Manager, Corporate Carrier Relations.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony in the above-referenced case.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge, information and belief.


Pam Hankins

Subscribed and sworn to before me this 18th day of December, 2008.


Notary Public

My Commission expires: perpetual
(SEAL)

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **PAM HANKINS**

4 **CASE NO. TC-2008-0225**

5
6 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

7 A. My name is Pam Hankins. My business address is 100 CenturyTel Drive, Monroe,
8 Louisiana 71203.

9 **Q. BY WHOM ARE YOU CURRENTLY EMPLOYED AND IN WHAT CAPACITY?**

10 A. I am employed by CenturyTel Service Group, LLC as Manager, Corporate Carrier
11 Relations. I have held this position since May of 2003.

12 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

13 A. CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a
14 CenturyTel (hereinafter collectively referred to as "CenturyTel" solely as a matter of
15 convenience).

16 **Q. WHAT IS THE RELATIONSHIP BETWEEN CENTURYTEL SERVICE GROUP,**
17 **LLC AND CENTURYTEL OF MISSOURI, LLC AND SPECTRA**
18 **COMMUNICAITONS GROUP, LLC D/B/A CENTURYTEL?**

19 A. CenturyTel Service Group, LLC and CenturyTel of Missouri, LLC ("CenturyTel of
20 Missouri") and Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra
21 Communications") are subsidiaries of CenturyTel, Inc.

1 **Q. IN YOUR CAPACITY AS MANAGER, CORPORATE CARRIER RELATIONS**
2 **WITH CENTURYTEL SERVICE GROUP, WHAT ARE YOUR PRIMARY**
3 **RESPONSIBILITIES?**

4 **A.** As a manager in the Carrier Relations Department, I provide support to all of CenturyTel,
5 Inc.'s incumbent local exchange carrier ("ILEC") subsidiaries. In this capacity, and
6 among my other duties, I oversee the implementation of interconnection agreements,
7 coordinate the development and documentation of implementation processes and
8 procedures, and oversee collections of past due accounts from carriers, both
9 interexchange carriers ("IXCs") and competitive local exchange carriers ("CLECs").

10 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND WORK BACKGROUND,**
11 **INCLUDING YOUR EXPERIENCE IN THE TELECOMMUNICATIONS**
12 **INDUSTRY.**

13 **A.** I am a licensed CPA, and I have been employed by CenturyTel, Inc. for over twenty (20)
14 years. I first worked as an analyst in CenturyTel, Inc.'s Cost Separations Department,
15 performing accounting, plant and traffic analysis, as well as completing cost separations
16 studies and forecasts. From this position, I was promoted to Supervisor, then Manager of
17 that Department. As Supervisor and Manager, I was responsible for overseeing the
18 preparation of any financial analyses performed in the Department for outside agencies
19 and for internal management, and for coordinating financial report preparation with other
20 departments. I also represented CenturyTel, Inc. on several industry committees. In July
21 1996, I moved to CenturyTel, Inc.'s Regulatory Department, where I was manager of
22 Regulatory Finance for seven years. My primary responsibilities included preparing
23 financial analyses for management, as well as financial reports and data request responses

1 for state public service commissions. I also was responsible for coordinating the
2 preparation and filing of several rate cases in the States of Wisconsin and Arkansas
3 during my tenure in the Regulatory Department. After working in this position for seven
4 years, I obtained my current title and position of Manager, Corporate Carrier Relations.

5 **Q. HAVE YOU PREVIOUSLY TESTIFIED OR FILED TESTIMONY BEFORE A**
6 **PUBLIC UTILITY OR PUBLIC SERVICE COMMISSION?**

7 A. Yes. I have provided both written and oral testimony in several jurisdictions concerning
8 various issues. Most recently, I provided testimony in an interconnection arbitration
9 proceeding before this Commission. I also filed testimony in Texas and Wisconsin in
10 interconnection arbitrations similar to the Missouri case. Earlier this year I filed
11 testimony before the Missouri Commission in a proceeding concerning disputed charges,
12 and last year I testified in an arbitration of disputed charges case before the American
13 Arbitration Association in Wisconsin. I also provided testimony in an interconnection
14 arbitration proceeding in Missouri in 2006, and provided testimony prior to that time
15 regarding collections complaints by certain CenturyTel, Inc. subsidiaries against CLECs
16 in Mississippi and Alabama. While serving as Manager, Regulatory Finance, I testified
17 in several rate case proceedings in Wisconsin and Arkansas. During this time I also
18 testified on behalf of CenturyTel, Inc.'s specific telephone company subsidiaries before
19 the state commissions in Alabama, New Mexico and South Carolina regarding
20 certification and name changes.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 A. The purpose of my testimony is to address CenturyTel's charges to Socket for
23 interconnection facilities that are at issue in this case. I will demonstrate that CenturyTel

1 has billed Socket in accordance with its agreement with Socket for direct interconnection
2 facilities where Socket's traffic exceeds established thresholds. I will also address the
3 counterclaim by CenturyTel of the charges due and owing by Socket for the provision of
4 such facilities and will demonstrate the outstanding amounts due for these facilities.

5 **Q. WHAT INTERCONNECTION FACILITIES CHARGES ARE AT ISSUE?**

6 A. As described by other witnesses in this case, Socket ordered a number of direct
7 interconnection facilities from CenturyTel of Missouri and Spectra Communications
8 prior to the effective date of its current interconnection agreements ("ICA"), which is
9 October 13, 2006.

10 **Q. WAS THERE A SPECIFIC DISCUSSION BETWEEN CENTURYTEL AND**
11 **SOCKET CONCERNING THE RATES TO BE CHARGED FOR THE**
12 **FACILITIES?**

13 A. Yes. As noted in more detail by Ms. Susan Smith's rebuttal testimony, on October 16,
14 2006, CenturyTel and Socket had a conference call to discuss several issues arising out of
15 the implementation of the new ICA that became effective on October 13, 2006. Specific
16 to this issue was a question that Socket raised during that meeting concerning the rates
17 they should pay for the existing direct interconnection facilities with Spectra.

18 **Q. WHAT RATES WERE AGREED TO DURING THAT MEETING?**

19 A. It was decided that all CenturyTel-provided facilities relating to the existing Spectra
20 Communications POIs would be converted to special access tariffed pricing. A review of
21 the existing tariffs would take place to determine the most cost-efficient pricing. This
22 would be the same tariffed pricing criteria that would take place if any carrier ordered
23 facilities that were jointly provided by multiple ILECs.

1 **Q. WHAT RATES WERE BILLED FOR THESE FACILITIES?**

2 A. CenturyTel has billed Socket for the Spectra Communications interconnection facilities
3 in dispute in this proceeding utilizing the appropriate transport mileage as shown in FCC
4 No. 4 and at the appropriate special access tariff rates. This is in conformance with the
5 agreement that Socket would be billed from the appropriate access tariff for the facilities
6 in place prior to the effective date of the current ICA.

7 **Q. CAN YOU DEMONSTRATE WHAT SOCKET WAS BILLED?**

8 A. Yes. Attached as **PROPRIETARY** Schedule PH-1 are schedules that demonstrate, by
9 month, what Socket has been billed for the facilities by CenturyTel of Missouri and
10 Spectra Communications.

11 **Q. CAN YOU EXPLAIN THE INFORMATION SHOWN IN PROPRIETARY**
12 **SCHEDULE PH-1?**

13 A. Yes. As stated above, there are actually two schedules, one for CenturyTel of Missouri,
14 the other for Spectra Communications, since the two ILEC companies bill Socket
15 separately under separate ICAs. The schedules contain headings that explain what the
16 information in each column represents, specifically, the bill date, the invoice number, the
17 prior month's ending balance, current month's charges, any payments received,
18 adjustments to the account during the month, and finally, the ending balance.

19 **Q. CAN YOU EXPLAIN THE NOTES AT THE BOTTOM OF THE SCHEDULES,**
20 **BELOW THE BILLING DATA?**

21 A. Yes. The notes concern the facilities CenturyTel of Missouri and Spectra
22 Communications have billed Socket that are in dispute in this proceeding. Ms. Smith
23 explains in more detail in her rebuttal testimony the issues surrounding those disputes.

1 Specifically, for CenturyTel of Missouri, Socket is disputing the need for direct
2 connection at Warrenton and St. James. Socket is also disputing the need for direct
3 connection with Spectra Communications at Canton, Palmyra, Monroe City, and Van
4 Buren. They also dispute the jointly-provided facilities costs of CenturyTel of Missouri
5 and Spectra Communications at Canton, Palmyra, Monroe City, and Van Buren.

6 **Q. WHAT DO THE SCHEDULES SHOW ARE THE OUTSTANDING BALANCES**
7 **CURRENTLY DUE ON THE ACCOUNTS?**

8 A. The schedules show that Socket owes CenturyTel of Missouri, as of December 10, 2008,
9 a balance of \$53,184.61. The total due to Spectra Communications Group, as of
10 December 15, 2008, is \$526,024.61.

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

12 A. Yes, it does.