

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

AUG 25 2000

Missouri Public  
Service Commission

Southwestern Bell Telephone Company's )  
Complaint Against Mid-Missouri )  
Telephone Company concerning Its Plan to )  
Disconnect the LEC-to-LEC Common )  
Trunk Groups and Request for an Order )  
Prohibiting Mid-Missouri from Disrupting )  
Customer Traffic. )

Case No. TC-2001-20

**SOUTHWESTERN BELL TELEPHONE COMPANY'S  
UPDATE TO STAFF'S STATUS REPORT**

Southwestern Bell Telephone Company (Southwestern Bell) respectfully submits this update to the Status Report filed on August 8, 2000 by the Missouri Public Service Commission's Staff (Staff):

1. As is evident from the Status Report Staff filed on August 8, 2000, Southwestern Bell has endeavored to keep Staff informed as to Southwestern Bell's efforts to develop methods to identify and block certain traffic in compliance with the Commission's July 18 2000 Order Granting Request for Preliminary Relief (Order), and to advise Staff of Southwestern Bell's progress in completing the ordered changes.

2. As Staff indicated in paragraph 6 of its Status Report, Southwestern Bell has been able to identify a method to block the universe of calls outlined in the Order with one minor exception: Traffic that might be originated by a CLEC utilizing Southwestern Bell's unbundled switching facilities. This is traffic that might be originated by a CLEC using Southwestern Bell's switch (i.e., when a CLEC purchases unbundled switching from Southwestern Bell to originate calls). The potential problem is that when a CLEC uses Southwestern Bell's switch to originate a call, that call looks no different than a call originated by one of Southwestern Bell's

own end-user customers. With such calls, the CLEC customer's NPA NXX looks like a Southwestern Bell NPA-NXX. Although that NPA-NXX was originally assigned to Southwestern Bell, the customer's specific telephone number is now being used by CLEC. Because the NPA-NXXs look the same, Southwestern Bell cannot screen these potential CLEC calls based on NPA-NXX.

3. But of all the traffic flowing to Mid-Missouri, Southwestern Bell believes this traffic type to be negligible, if it exists at all. In analyzing this issue, Southwestern Bell examined switch records for the June and July data month and found that there was no traffic to the Mid-Missouri exchanges utilizing Southwestern Bell's unbundled switching facilities. This is likely due to the fact that Southwestern Bell in April 1998 issued an Accessible Letter informing CLECs that Southwestern Bell did not want its intraLATA toll services to be offered as an available option to facilities-based CLEC customers.

4. Southwestern Bell, however, believes that there may be a few instances where certain CLECs utilizing unbundled switching have not complied with the Accessible Letter and have assigned the LPIC (the designation of the primary interexchange carrier for intraLATA toll selected by the end-user) to Southwestern Bell's default code, which would cause the CLEC's intraLATA toll traffic to be placed on the LEC-to-LEC common trunk groups. To help address this potential problem, Southwestern Bell has contacted each of these CLECs and requested that they correct the LPICs for these customers. Southwestern Bell has also conferred with Mid-Missouri concerning the treatment of this possible traffic type. Although there was none of this traffic in the data months Southwestern Bell examined, Southwestern Bell will continue to monitor this traffic. In the event that any of this traffic does appear, Southwestern Bell will

provide Mid-Missouri a record of that traffic so it can be billed appropriately. In the meantime, Southwestern Bell will continue to look for a technical resolution.

5. To update Staff's August 8, 2000 Status Report, Southwestern Bell wishes to report that it has completed the programming process to block traffic the Commission found to be unauthorized at Southwestern Bell's tandem switch. With the minor exception discussed above, all of Southwestern Bell's programming efforts were completed on schedule and the blocking put in place prior to August 18, 2000. Calls the Commission found to be unauthorized are no longer being transited to Mid-Missouri's exchanges. Instead, those calls are being sent to a recorded intercept message informing the caller that: "The provider you have selected is not authorized to complete calls to this area. If you have questions contact your local service provider."

6. Prior to the implementation of the Commission ordered blocking, Southwestern Bell on July 21, 2000 mailed letters to all CLECs and wireless carriers with whom it connects at its Kansas City McGee tandem informing them of this case, the Commission's Order, and the potential ramifications of the Order. In addition, Southwestern Bell on July 25, 2000 posted an Accessible Letter on its website providing similar information. A copy of this Accessible Letter was filed by Staff with its August 8, 2000 Status Report.

7. Finally, Southwestern Bell would like to advise the Commission that it does provide operator services for various small LECs in the State and some CLECs. In its provision of operator services to these companies, it is possible that calls might come from one of their customers to a Southwestern Bell telephone operator for completion to Mid-Missouri. Southwestern Bell will block these calls unless the call is identified by the customer as an

emergency. Southwestern Bell does not believe it would be appropriate nor that the Commission intended that emergency calls be blocked. Southwestern Bell has conferred with Staff and Mid-Missouri on this issue. Unless the Commission directs otherwise, Southwestern Bell will not block these emergency calls.

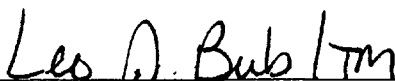
Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by hand or fax, and first-class, postage prepaid, U.S. Mail on August 25, 2000.

  
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