

Exhibit No.:

Issue:

Witness:

Type of Exhibit:

Sponsoring Party:

Case No.:

Records Test

W. Robert Cowdrey

Direct Testimony

Sprint

TO-99-593

FILED²

NOV 30 2000

Missouri Public
Service Commission

**SPRINT
CASE NO. TO-99-593**

DIRECT TESTIMONY

OF

W. ROBERT COWDREY

November 30, 2000

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CASE NO. TO-99-593

1 **Q. WILL YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?**

2 A. My name is W. Robert (Bob) Cowdrey. My business address is 5454 West 110th
3 Street, Overland Park, Kansas 66211.

4 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

5 A. I am employed by Sprint/United Management Company as Director-Regulatory
6 Affairs for Missouri and Kansas.

7 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND
8 RELEVANT WORK EXPERIENCE.**

9 A. I have attached Schedule WRC-1 which contains this information.

10 **Q. HAVE YOU PREVIOUSLY APPEARED BEFORE THIS COMMISSION?**

11 A. Yes, I have previously provided testimony in Cases No. TR-97-567, TO-97-
12 217/97-220, TO-99-254, and TO-99-483.

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

14 A. My testimony will provide a description of the process used during the Missouri
15 billing records test that compared originating recordings from wireless carriers,
16 Interexchange Carriers (IXCs) , Incumbent Local Exchange Carriers (ILECs) and
17 Competitive Local Exchange Carriers (CLECs) to the terminating recordings
18 performed by a sample group of small local exchange carriers.

19 **Q. PLEASE PROVIDE THE BACKGROUND RELATED TO THIS CASE.**

20 A. As a result of the Commission's Report and Order issued June 10, 1999, in Case

1 No. TO-99-254 et al., the intraLATA Primary Toll Carrier Plan was eliminated in
2 Missouri. During the PTC proceeding, some of the small ILECs in Missouri
3 alleged that they were not receiving billing records and compensation for 100% of
4 the traffic that was terminated to them via the LEC-to-LEC (FGC) network. As a
5 result, on June 15, 1999, the Commission established this case in order to
6 investigate these issues and gave notice to all telecommunications companies
7 certificated in Missouri. Technical workshops were hosted by the Missouri Public
8 Service Commission Staff in Jefferson City on January 19 and February 22, 2000.
9 Network, billing records and traffic measurement issues were discussed at length
10 by industry representatives in attendance. It was agreed by the parties that if,
11 indeed, discrepancies were believed to exist between terminating recordings and
12 the billing records for that traffic, then steps must be taken to implement a
13 coordinated test or sample in order to identify and investigate any such "gaps".
14 To investigate the alleged differences in recordings, the industry decided to
15 perform a billing record test to compare the terminating records of a sample of
16 small ILECs with the originating records sent to those small ILECs from all
17 originating carriers. A date of July 16-17 was chosen for the test.

18 **Q. PLEASE DESCRIBE THE PROCESSES USED IN THE RECON-**
19 **CILIATION OF THIS DATA.**

20 **A.** The reconciliation of terminating recordings and originating billing data for traffic
21 on the Public Switched Network is no small task to undertake. There are no
22 industry approved or national standards which address the recording requirements
23 needed for inter-carrier compensation for the many carriers involved in the

1 origination, transport, and termination of traffic across the network. Each
2 originating company must record all calls at the call detail level, track the calls
3 through their complex billing processes including numerous systems and files,
4 determine the qualifying originating calls, format those calls into a special test
5 format and send those test calls to the sample terminating local exchange carriers.
6 Each terminating company must record all calls terminated to the sample
7 exchanges and format those calls for comparison purposes. A comparison of
8 calls recorded by the originating companies and the terminating company must
9 then be created and any discrepancies noted for reconciliation purposes.

10 The reconciliation process is difficult to say the least. The process is
11 hampered because the terminating end office switches do not receive and record
12 ample information to correctly bill the originating company responsible for
13 placing the traffic on the network. Only in limited circumstances do the
14 terminating tandems even have the information to bill the correct carrier when the
15 call transited another tandem. Very little information can be identified on the
16 terminating recordings except for the terminating phone number, time of call and
17 duration of call.

18 Fortunately, in the majority of cases, the originating records contain the
19 complete data needed to bill the correct originating carrier and a large percentage
20 of the originating and terminating recordings match. Sprint continues to support
21 that originating records are appropriate for billing because they are the only
22 records that correctly identify the originating company responsible for placing the
23 traffic on the network and paying for the termination of that traffic.

1 **Q. PLEASE DESCRIBE THE RECORDS TEST CONDUCTED BY THE LEC**
2 **INDUSTRY.**

3 A. The parties agreed to work together, cooperatively, to plan and implement a
4 “Missouri Record Exchange Test” whereby a sample set of end offices and
5 tandems would participate in a test designed to capture, compare, and
6 analyze call data at switches and subsequently compare that information with
7 billing records. The sample included small companies in all four Missouri
8 LATAs with offices subtending SWBT, GTE, and Sprint. For purposes of the
9 test, exchanges of Rock Port Telephone Company and Kingdom Telephone
10 Company, which subtend Sprint tandems in the Kansas City LATA and
11 Westphalia LATA respectively, were chosen. The parties developed a detailed
12 technical plan for the test and time line schedule. Plans called for a 48 hour test
13 period for July 16-17, 2000. It was further agreed that priority would be given to
14 a complete analysis and reconciliation effort for one hour’s total usage for each
15 exchange during one of the test days (July 17, 1 to 2 p.m.) Pre-test coordination
16 was conducted by the companies to ensure that data would be available in usable
17 format. Two separate sets of data were collected – one for Mid Missouri
18 Telephone and one set for all the other carriers.

19 **Q. WHAT WERE THE RESULTS OF THE RECORDS TEST FOR SPRINT?**

20 A. At this time, I can only speak to the Mid Missouri records test. Sprint continues
21 to review its billing files and have recently located some additional records that
22 terminated to Rockport Telephone, but these records have not been transmitted to
23 the small company’s consultant for comparison purposes. As there are still

1 discrepancies between the records received by the subtending exchanges of
2 Rockport and Kingdom, Sprint continues to work to ensure the most accurate test
3 possible. It is interesting to note that differences uncovered at this point in the
4 process go both ways. In some cases, the originating records sent by Sprint and
5 other companies are less than those recorded by the terminating company. But, in
6 at least one case, the originating records sent by Sprint and the other companies
7 that terminated traffic to a small LEC are actually greater than those recorded by
8 the terminating company. I expect that the results of these tests will be complete
9 by the next round of testimony.

10 For the Mid Missouri Telephone test, Mr. David Jones of Mid Missouri
11 contacted Sprint by telephone on August 8, 2000 and indicated that "the sample
12 was representative and we matched perfectly" between what Mid Missouri
13 expected Sprint to send for terminating records and the records sent by Sprint.

14 **Q. WHAT, IN YOUR OPINION, MAY ACCOUNT FOR ANY**
15 **DIFFERENCES IN TERMINATING RECORDINGS VS. BILLING**
16 **RECORDS?**

17 **A.** There can be several reasons for these differences to occur. Primary factors to
18 consider include (1) capabilities of switches to produce accurate, detailed
19 terminating recordings with complete information, (2) accuracy and completeness
20 of originating records data, (3) ability of receiving parties' systems to accurately
21 process incoming records and related data transmittal media from other parties,
22 (4) unexpected occurrences such as billing system errors that were later corrected
23 and (5) billing record creation or transmittal problems. Of course, the type of

1 traffic being recorded is also a major consideration. For example,
2 interstate/intraLATA traffic which is currently bill and keep and for which no
3 records are currently created may provide a source of discrepancy. FGA, FGB,
4 and FGD IXC as well as wireless traffic and the related billing records are
5 handled via separate and distinct billing systems and recording mediums. These
6 factors can all act to add complexity when comparing terminating recordings with
7 billing records from numerous sources.

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

9 **A.** Yes.

W. Robert (Bob) Cowdrey III

Professional Experience:

Sprint, *Director- Regulatory Affairs*

Responsible for advocacy of Sprint policies, regulatory matters and industry relations for the states of Missouri and Kansas.

Sprint - Western Operations, *Sr. Revenue Planning Manager*

Responsible for tariffs, external relations, toll plans, pricing and costing for the states of Missouri and Kansas.

Sprint/United Telephone Midwest, *Sr. Revenue Planning Supervisor*

Responsible for development, demand analysis, variance analysis and reporting of revenues budget for Missouri.

Sprint/United Telephone, *Sr. Costing Supervisor*

Responsible for development and implementation of improved processes to ensure the accurate billing to IXC and LEC customers for switched access.

Sprint/United Telephone, *Accounting Supervisor-Message Processing System*

Responsible for ensuring that toll and access messages are received, rated and processed to billing systems in an accurate and timely manner

Sprint/United Telephone Midwest, *Administrator - Revenue Planning*

Responsible for Missouri regulated revenues budget for local and intrastate services.

United Telecommunications, Inc., *Analyst - Demand Forecasting*

Responsible for access and toll minutes forecasting to ensure accuracy of budgets and FCC and state tariff filings.

Education:

University of Kansas, Lawrence, Kansas

- Bachelor of Science in Business and Accounting, May 1988

- 32 hours of MBA

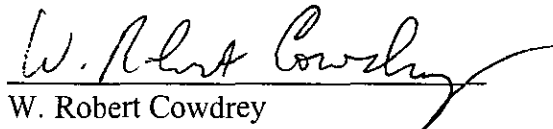
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Investigation)
Into Signaling Protocols, Call Records,) Case No. TO-99-593
Trunking Arrangements and Traffic)
Management)

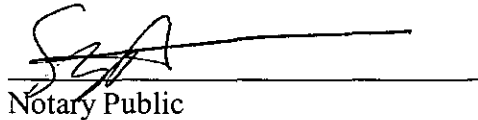
AFFIDAVIT OF W. ROBERT COWDREY

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

W. Robert Cowdrey, of lawful age, on his oath states: That he has participated in the preparation of the attached Direct Testimony in question and answer form, consisting of 6 pages plus schedules, to be presented in the above case; that the answers in the attached Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.


W. Robert Cowdrey

Subscribed and sworn to before me this 29, day of November, 2000.


Notary Public

STEPHEN D. MINNIS
Notary Public
State of Kansas
My Appt. Expires 10/08/01

My appointment Expires: 10/08/01