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September 22, 2000

FILED³

SEP 22 2000

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Re: Case No. TO-99-593

Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and eight copies of Joint Motion to Establish Procedural Schedule.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Leo J. Bub /tm

Leo J. Bub

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
SEP 22 2000

In the Matter of the Investigation into Signaling)
Protocols, Call Records, Trunking Arrangements,)
and Traffic Measurement.)

Case No. TO-99-593

Missouri Public
Service Commission

JOINT MOTION TO ESTABLISH PROCEDURAL SCHEDULE

1. Southwestern Bell Telephone Company, Sprint Missouri, Inc. and Staff of the Missouri Public Service Commission respectfully request the Missouri Public Service Commission to adopt the following procedural schedule for this case:

November 3, 2000	Report to the Commission on Industry Records Test Currently Under Way
December 8, 2000	Report to the Commission on Proposed Verification Test
January 17, 2001	Direct Testimony
February 7, 2001	Rebuttal Testimony
February 28, 2001	Surrebuttal Testimony
March 12-14, 2001	Hearing

2. This proposed procedural Schedule is approximately a month and a half behind the procedural schedule proposed by the Missouri Independent Telephone Group (MITG) in its September 13, 2000 Motion for Adoption of Procedural Schedule. In its Motion, MITG correctly indicates that counsel for GTE (now Verizon Midwest, Inc), Southwestern Bell, Sprint and STCG conferred and tentatively agreed to the procedural schedule MITG proposed in its Motion. While there was agreement to submit the proposed schedule to other parties in the case for comment, the parties had not yet agreed to submit it to the Commission.

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3. Due to circumstances unforeseen at the time the earlier procedural schedule was mapped out by the parties, Southwestern Bell, Sprint and Staff no longer believe the MITG procedural schedule is workable. GTE, Southwestern Bell, and Sprint's concurrence with the earlier procedural schedule was based on the timeline agreed to by the industry for the Records Test. This test has been a significant undertaking. All local exchange carriers in the state have participated. Following an agreed-to test process (that itself took the parties quite a bit of time to develop and set up), all LECs captured individual call records on both the originating and terminating ends of all intraLATA toll calls placed in the state during a specifically designated 48 hour period. Outside consultants were engaged to process this data with computers to compare, for each call, records created on the originating side with those created on the terminating side. Calls recorded at the terminating end for which there was no corresponding originating record were to be specifically identified and forwarded to the originating companies for further investigation. Based on that investigation, originating carriers were expected to provide explanations for the unmatched calls identified, or, if system problems were uncovered, to correct them. The parties also agreed to jointly prepare a report to the Commission on the results of the test. The timeline for the Records Test called for:

July 16-17, 2000	Capturing Call Records by Originating and Terminating Companies
July 31, 2000	Provision of Call Records by Originating and Terminating Companies to Consultants for Analysis
September 1, 2000	Consultants Provision of Non-matched Call Records to Originating LEC for Further Analysis
September 29, 2000	Terminating LECs' Provision of Explanations or Other Supporting

Information Concerning Non-matched
Calls

October 20, 2000

Issuance of Industry Report Records Test

4. When putting together the tentative procedural schedule, GTE, Southwestern Bell and Sprint were very concerned that any litigation schedule established not interfere with work necessary to be performed in the Industry Records Test. When they received the data from the small companies' consultant on September 1, 2000, GTE, Southwestern Bell and Sprint wanted to be able to devote their internal resources to the work they were assigned in this Industry Records Test: investigating each call terminated by the small companies for which there was not a corresponding originating record, determining the reason for it, and rectifying any problems found. Under the agreed upon timeline for the Records Test, GTE, Southwestern Bell and Sprint were to report back to the small companies on September 29, 2000. After that, all parties were to work together to prepare a report on the Industry Records Test which was to be finalized on October 20, 2000.

5. But due to unforeseen problems encountered in gathering data for the consultants and in the processing of that information during the course of the Records Test, the agreed upon timeline has slipped by two weeks. Consequently, the consultants were not able to provide the non-matched call records to GTE, Southwestern Bell and Sprint until the afternoon of September 15, 2000.¹ GTE, Southwestern Bell and Sprint therefore have lost two weeks of their allotted work time for analyzing the unmatched records provided by the small companies' consultant. For Southwestern Bell, the loss of two weeks of work time is particularly acute because it agreed to be responsible for analyzing the data for eight of the 10 small companies participating in the Industry Records Test.

6. In addition, Southwestern Bell, Sprint and Staff believe it is necessary to run an additional, but smaller, test to verify that any system corrections made as a result of what was found in the initial Records Test cured any problems identified. For example, Southwestern Bell, during the course of its analysis, discovered that some of its switches (specifically its Ericsson switches) were not properly recording its Local Plus traffic. Southwestern Bell believes that it has corrected this switch translation error. However, it would be in the industry's interest as a whole to verify that these switch translation corrections took care of the problem. Under the schedule proposed by Southwestern Bell, Sprint and Staff, data for the verification test could be captured immediately after the larger companies have finished analyzing the data from the initial Records Test. And since the verification test would be on a smaller scale than the original test and the parties are now familiar with the process, the timeline for the verification could be more compressed than what was necessary for the first test.

7. Pushing the procedural schedule back one and one-half months beyond what has been proposed by MITG is necessary to allow the parties sufficient time to investigate and explain the unmatched call records, and to conduct a more compressed verification test to ensure that any system problems discovered during the initial Records Test have been appropriately corrected. This proposed procedural schedule should not materially prejudice any party to this case. To date, the only significant recording problem discovered has been the switch translation in Southwestern Bell's Ericsson switches. Southwestern Bell has already offered to make preliminary settlement adjustment (subject to true up) with any company that felt itself to be adversely impacted (and Southwestern Bell has made such a preliminary settlement adjustment with one company).

¹ Mid-Missouri Telephone Company took responsibility for analyzing its own data and did provide its analysis to other parties by September 1, 2000.

8. This case was opened by the Commission as an investigation, not a complaint. In an investigation, it is expected that the Commission would be interested in getting the most accurate and complete information on the sources of any problems that might be found and finding a way to correct them. Such a purpose would be better served by establishing a procedural schedule that allows the larger companies their allotted time to complete their part of the Industry Records Test and sufficient time to perform a smaller test, as needed, to verify that any system corrections made addressed problems identified.

WHEREFORE, Southwestern Bell, Sprint and Staff respectfully request the Commission to adopt the procedural schedule they have set out above.

Respectfully submitted:

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