

Exhibit No.:
Issue: Remote Call Forward
Witness: Ralph P. Teasley
Sponsoring Party: CenturyTel of Missouri, LLC &
Spectra Communications
Group, LLC d/b/a CenturyTel
Type of Exhibit: Rebuttal Testimony
Case No.: TC-2007-0307
Date Testimony Prepared: July 6, 2007

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

REBUTTAL TESTIMONY

OF

RALPH P. TEASLEY

CASE NO. TC-2007-0307

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

In the Matter of CenturyTel of Missouri,)
LLC and Spectra Communications Group,)
LLC d/b/a CenturyTel Tariff Filings to)
Grandfather Remote Call Forward Services)
To Existing Customers and Existing)
Locations.)


Case No. TC-2007-0307
Tariff Nos. JI-2007-0498
JI-2007-0499

AFFIDAVIT OF RALPH P. TEASLEY

STATE OF MISSOURI)
) ss.
COUNTY OF ST. CHARLES)

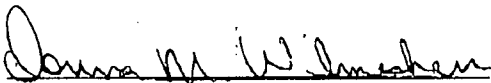
I, **Ralph P. Teasley**, of lawful age and being duly sworn, state as follows:

1. My name is Ralph P. Teasley. I am presently Manager of Network Support Centers for CenturyTel Service Group, LLC.
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.



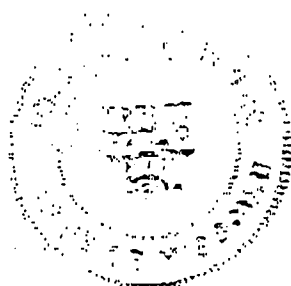
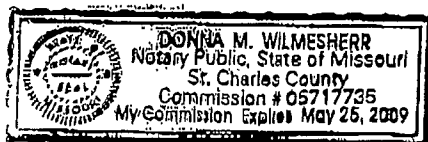
Ralph P. Teasley

Subscribed and sworn to before me this 6th day of July, 2007.



Notary Public

My Commission expires: May 25, 2009
(SEAL)



1 **Q. Mr. Kohly states that Socket is not aware of any situation where CenturyTel's**
2 **network has been impaired by a request by Socket to port an RCF service number**
3 **(Kohly Direct, Page 11, Lines 1-4). Do you have any specific examples of a situation**
4 **where Socket's porting of an RCF Service Number has impaired CenturyTel's**
5 **network?**

6 **A.** First, I would like to note that when CenturyTel reviews a number porting request and
7 finds a situation that may jeopardize our network and impair our customers' ability to
8 make and receive calls, we will put such a porting request in an unworkable status to
9 protect our network. So, if we can identify a problem before it occurs, we will do
10 everything in our power to avoid the problem. Conversely, if we identify problems after
11 the fact we will take all the necessary steps to correct them.

12 The real issue is that, under CenturyTel's tariff, RCF Service is restricted to one
13 call at a time, and by the terms of CenturyTel's tariff, it cannot be used for toll bypass.
14 Socket Internet admits that it wants these RCF Service numbers with the intent to have its
15 affiliate port the numbers from CenturyTel. The only valid reason for porting the
16 numbers is to allow multiple calls to the former RCF Service number and to not pay the
17 toll charges that should be incurred for these calls - the very two things that users of RCF
18 service are prohibited from doing. If Socket then advises internet dial-up customers to
19 dial the ported numbers, the volume of calls, as well as the duration of the calls, increases
20 exponentially; and the traffic stays on CenturyTel's toll trunks because Socket has direct
21 trunks to very few CenturyTel end offices. As a matter of fact, Socket has informed
22 CenturyTel that it intends to disconnect the direct end office trunks that it does have.
23 CenturyTel's toll trunks are not designed to carry the kind of traffic volume created by

1 ISP-bound traffic. The number of simultaneous calls would be limited only by the
2 number of trunks transporting the ported calls and the equipment the ported number
3 terminates to. As I clearly pointed out in my Direct Testimony, the increase in traffic
4 volume could potentially jeopardize CenturyTel's network and impair or inhibit meeting
5 the needs of our end-user customers if our toll trunks are overloaded with ISP-bound
6 traffic. I do not think it is good business judgment to wait until the damage is done
7 before CenturyTel does anything to resolve this problem.

8 Nevertheless, before we recognized that Socket was submitting port requests that
9 move the RCF Service number outside of its original rate center, we ported RCF Service
10 numbers that have created congestion on our network. As an example, in late October
11 2006, Socket requested to port out two RCF Service lines in the Rockville, Missouri
12 office. One number goes to Socket Customer Service and the other number is designated
13 as a Socket Internet dial-up number. I would note that Socket does not have numbering
14 resources in this exchange. Both of Socket Internet's numbers return a Socket Local
15 Routing Number ("LRN") in the 816 NPA, which is routed over the IntraLATA trunk
16 group to Warrensburg. It was necessary to install facilities to increase the size of this
17 trunk group to eliminate the blockage that the increased traffic created following the
18 completion of these porting requests. Moreover, since the IntraLATA trunk group
19 terminates in Warrensburg, Missouri, which is the tandem switch for the Rockville
20 exchange, Embarq was also required to increase its trunk group capacity to accommodate
21 Socket's request to port a CenturyTel RCF number in a manner that violates CenturyTel's
22 tariff. This should highlight for the Commission the real burden placed on the local
23 exchange carrier interoffice network by such abuses.

1
2 **Q. Mr. Kohly asserts in his Direct Testimony that CenturyTel's RCF Service is**
3 **necessary for use in emergency and disaster situations to forward calls from an area**
4 **affected by the disaster to an area that is not affected by the disaster (Kohly Direct,**
5 **Page 16, Lines 19-22; Page 17, Lines 1-6). Is CenturyTel's RCF Service the only**
6 **means available?**

7 A. No. I would agree that assisting customers who are affected by emergencies or disasters
8 to reestablish communications is very important. But there are other means to meet this
9 need. For example, CenturyTel could activate a fixed call-forwarding service on the
10 customer's line on the customer's behalf rather than using the RCF Service. I personally
11 have a great deal of experience in dealing with outages caused by disasters during my 36-
12 year career. I have no doubt, based on first hand experience with dealing with the
13 aftermath of hurricanes Rita and Katrina, that CenturyTel will use all possible tools
14 available to meet customer needs during an emergency or disaster.

15 **Q. Mr. Kohly also asserts that CenturyTel's RCF Service is useful for business**
16 **customers who want to appear to have a presence in a location for customers to**
17 **make local calls (Kohly Direct, Page 17, Line 7-16). Is CenturyTel's RCF Service**
18 **the only means available for business customers to achieve this?**

19 A. No. While the RCF Service is useful in these rare instances, there are other alternatives.
20 A business customer could easily set up FX Service or establish a physical line with the
21 Call Forward, No Answer option. In fact, RCF Service may not be most attractive option
22 for businesses as it can only handle one call at a time; and for a busy enterprise, the per
23 minute toll charges can be more expensive than the flat-rated FX circuit. I would note

1 that Mr. Martinez has testified that only one-half of one percent of CenturyTel customers
2 purchase our RCF Service and these customers will not be losing their existing service.

3 **Q. Does this conclude your rebuttal testimony?**

4 **A. Yes it does.**