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Witness: Judy L. Osburn
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Sponsoring Party: Southwestern Bell Telephone, L.P.,
d/b/a SBC Missouri
Case No: TC-2002-190

SOUTHWESTERN BELL TELEPHONE COMPANY

CASE NO. TC-2002-190

REBUTTAL TESTIMONY

OF

JUDY L. OSBURN

Kansas City, Missouri

February 7, 2003

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Judy L. Osburn. My business address is 500 E. 8th Kansas City, MO 64106.

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

A. I am employed by Southwestern Bell Telephone, L. P. d/b/a SBC Missouri ("SBC"). I am a Senior Manager-Technical Support in the Kansas City Network Operations Center ("NOC").

Q. HAVE YOU PREPARED AN EXHIBIT THAT PROVIDES INFORMATION REGARDING YOUR EMPLOYMENT, TRAINING, AND APPEARANCES BEFORE THE COMMISSION?

A. Yes. That information is attached as Osburn Schedule 1.

II. PURPOSE.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my testimony is to respond to the direct testimony of David Jones and Denise Day who filed on behalf of Mid-Missouri Telephone Company. Specifically, I will discuss:

- The processes used by Southwestern Bell Telephone (which is now known as "SBC Missouri") to initially implement the required blocking for traffic terminated to Mid-Missouri Telephone Company;

- 1 • The NOC's efforts, after we learned of Mid-Missouri's complaint, to verify that
- 2 our blocking was still correct; and
- 3 • The results of my investigation into the calls Mid-Missouri incorrectly claims
- 4 were improper InterLATA SBC Missouri-originated calls.

5

6 **III. THE BLOCKING WORK**

7 **Q. WHAT IS SBC MISSOURI'S TECHNICAL CAPABILITY OF BLOCKING?**

8 A. SBC Missouri only has the capability to block at the trunk level. This means that we can

9 either block all or no calls coming in on a particular trunk to a specified terminating

10 exchange. We do not have the technical capability to identify and block calls by call type

11 or by originating and terminating NPA NXX combination.

12

13 **Q. HOW IS SUCH BLOCKING DONE?**

14 A. Through translations that we program into our switch, we create and apply a screening

15 table to particular trunks coming into our tandem that would not permit calls to be

16 completed over these trunks to the specified Mid-Missouri Telephone NPA-NXX

17 combinations (i.e., the first six dialed digits of a telephone number). This screen would

18 block traffic to Mid-Missouri Telephone but would allow all other appropriate traffic to

19 flow to other terminating carriers. SBC Missouri described this process to the

20 Commission during the hearing on July 14, 2000 in Case No. TC-2001-20. In that

21 proceeding, Sharon Sadlon, SBC's Associate Director – DMS Translations, testified on

22 the blocking capability we have in our network. (A copy of pages 60 – 61 from the

23 hearing transcript in that case is attached as Osburn Schedule 2.)

1 **Q. WERE YOU INVOLVED IN IMPLEMENTING THE BLOCKING FOR MID-**
2 **MISSOURI TELEPHONE?**

3 A. Yes. I was the manager responsible for overseeing the initial blocking of the
4 Commission's Order and continue to be responsible for maintaining appropriate
5 blocking.

6
7 **Q. PLEASE EXPLAIN THE PROCESS YOU USED TO IMPLEMENT THE**
8 **BLOCKING FOR MID-MISSOURI TELEPHONE.**

9 A. After the Commission's Order was issued, we worked with our Operator Services group,
10 our methods group, and our technical assistance group to develop a specific method and a
11 process for blocking this traffic. As described above, blocking is performed on a trunk
12 group basis, blocking all calls coming in on a trunk group destined for any Mid-Missouri
13 NPA-NXX codes. A spreadsheet was provided to us with the trunk groups to block by
14 our Network Engineering department. For all CLEC (Competitive Local Exchange
15 Carrier) and ILEC (Independent Local Exchange Carrier) trunk groups from the SBC
16 Missouri Tandem office that met the criteria of the order, we used the class of service
17 screening table on the involved trunk groups to block the traffic terminating to the Mid
18 Missouri NXX codes identified. IXC (Interexchange Carrier) trunk groups were already
19 being blocked by existing class of service screening tables. In the Traffic Operator
20 Position System ("TOPS") remote switches located in, Chillicothe, Kirksville, and St.
21 Joseph we were required to build class of service screening tables to block this traffic, so
22 that any operator assistance traffic would be blocked appropriately. We had the initial

1 blocking double checked for accuracy, once by the technician performing the work and
2 also by me.

3
4 **Q. WHAT IS A CLASS OF SERVICE SCREENING TABLE?**

5 A. A class of service screening table is a table applied to trunk groups when additional
6 translations may be required based on the call type and/or call type plus digits dialed (i.e.,
7 when the destination of the call is dependant upon the digits dialed and requires different
8 routing than what is currently being used in the Home NPA Code ("HNPA CODE") Sub
9 table).

10
11 **Q. HOW MANY TRUNK GROUPS WERE INITIALLY BLOCKED?**

12 A. This process blocked a total of 78 trunk groups with a total of 10,299 trunks.

13
14 **Q. HOW MUCH TIME DID IT TAKE SBC TO IMPLEMENT THE BLOCKING**
15 **FOR MID-MISSOURI TELEPHONE?**

16 A. SBC spent approximately 97 person hours to complete this initial work.

17
18 **Q. WHAT HAS YOUR NETWORK GROUP DONE SINCE IMPLEMENTING THE**
19 **INITIAL BLOCKING?**

20 A. We have maintained the initial translations that we built for the order, and have continued
21 to add that screening table onto each new CLEC, ILEC or IXC trunk group as they were
22 translated into the switch. To date we are blocking 179 trunk groups, with 21,834 trunks

1 in them. In addition, I have educated our technicians of the critical importance of our
2 maintaining appropriate blocking for Mid-Missouri Telephone.

3
4 **Q. HAS YOUR GROUP DONE ANYTHING TO VERIFY THAT THE BLOCKING**
5 **IMPLEMENTED FOR MID-MISSOURI TELEPHONE IS STILL IN PLALCE?**

6 A. Yes. After the complaint was filed in this case, we re-verified the translation work we
7 performed for Mid-Missouri Telephone to ensure that these translations were in fact still
8 in place. We completed these verifications around the middle of March 2002 and again
9 in August 2002.

10
11 **Q. WHAT DID YOUR INVESTIGATION SHOW?**

12 A. In the March investigation we found that all blocking was appropriately in place and
13 blocking calls as required. However, in our August investigation we found one CLEC
14 trunk group that had been installed did not have the class of service blocking assigned to
15 the trunk group. Upon this discovery we immediately corrected it.

16
17 **IV. INVESTIGATION OF MID-MISSOURI TELEPHONE'S DATA.**

18 **Q. IN YOUR CAPACITY AS A SENIOR MANAGER-TECHNICAL SUPPORT , DID**
19 **YOU REVIEW THE SCHEDULES MID-MISSOURI TELEPHONE WITNESS**
20 **DAVID JONES ATTACHED TO HIS DIRECT TESTIMONY AS HIGHLY**
21 **CONFIDENTIAL SCHEDULES 3 – 10?**

22 A. Yes. I reviewed them after the Commission authorized a limited group of internal subject
23 matter experts within SBC to access this information.

1 **Q. DID YOU SIGN THE COMMISSION’S NONDISCLOSURE AGREEMENT?**

2 A. Yes.

3

4 **Q. IN YOUR OPINION, DOES THE INFORMATION IN MR. JONES’ SCHEDULES**
5 **3HC – 10HC SHOW THAT SBC MISSOURI FAILED TO BLOCK CERTAIN**
6 **CALLS FROM TRANSITING ITS NETWORK AND TERMINATING IN MID-**
7 **MISSOURI TELEPHONE’S EXCHANGES?**

8 A. No. From my perspective, they show very little. They are just very high-level
9 summaries. All they show is the total number of calls that Mid-Missouri Telephone
10 claims to have recorded, the carriers it believes originated the calls, and the carrier
11 connect time. They provide no individual call detail, that is, they do not identify any
12 particular call, the date and time the calls were claimed to have been made, and the
13 originating or terminating telephone numbers.

14

15 **Q. DID YOU REVIEW THE DATA PROVIDED BY MID MISSOURI ABOUT THE**
16 **CALLS FROM SEPTEMBER 12, 2002?**

17 A. Yes.

18

19 **Q. WHAT ELSE DID YOU REVIEW TO INVESTIGATE THESE CALLS?**

20 A. Given that we were analyzing a very recent data period, I was able to retrieve and review
21 SBC’s AMA (Automatic Message Accounting) records for these calls. In addition, we
22 were able to have our Agilent (formerly Hewlett Packard) Business Intelligence AcceSS7
23 system gather some additional data on these calls, which I also reviewed.

1 **Q. WHAT WERE THE CONCLUSIONS FROM YOUR INVESTIGATION?**

2 A. Based on our investigation, none turned out to be as Mid-Missouri claimed.

3

4 **Q. WHAT SPECIFICALLY DID MID-MISSOURI CLAIM WITH RESPECT TO**
5 **THE SEPTEMBER 12, 2002 CALLS?**

6 A. Mid-Missouri claimed that there were 69 calls that SBC Missouri inappropriately sent to
7 Mid-Missouri for termination. These calls were categorized into three groups: (1) 41
8 calls Mid-Missouri believed to be originated by SBC Missouri; (2) 26 calls Mid-Missouri
9 believed to be originated by Sprint and transited by SBC Missouri; and (3) 2 calls Mid-
10 Missouri believed were originated by Verizon and transited by SBC Missouri.

11

12 **Q. WHAT DID YOUR ANALYSIS SHOW FOR THESE 69 CALLS?**

13 A. In reviewing the 69 calls, we found that Cingular Wireless delivered all but one to SBC
14 Missouri through an interconnection trunk at SBC Missouri's McGee tandem. The only
15 landline call was one call that was originated by a Verizon landline customer (636-528-
16 81**).¹ This customer, however, did not place the call to the Mid-Missouri subscriber.

17

¹ The last two digits of this and the other actual telephone numbers are being masked to preserve the confidentiality of these customer telephone calls and to avoid classifying the text of this testimony as Highly Confidential ("HC"). The schedules in which these calls appear, however, display the entire telephone numbers and the entirety of these schedules are classified as HC.

1 That is because the Verizon subscriber actually placed the call to an SBC customer (660-
2 882-97**) who had call forwarding activated to a Mid-Missouri customer (660-846-
3 4213). As can be seen by the SBC Missouri subscriber's number and the Mid-Missouri
4 subscriber's number, the second leg of this call path was simply an intraLATA toll call
5 from the SBC customer to the Mid-Missouri customer. The result of our investigation
6 into all 69 of these calls is shown on Hughes Joint Schedule 2HC, which is attached to
7 Mr. Hughes' Rebuttal Testimony.

8
9 **Q. HOW DO YOU KNOW THAT THE REMAINING CALL WAS A CALL FROM A**
10 **VERIZON LANDLINE CUSTOMER TO AN SBC MISSOURI LANDLINE**
11 **CUSTOMER, THAT WAS CALL FORWARDED TO A MID-MISSOURI**
12 **LANDLINE CUSTOMER?**

13 A. With respect to this call, the NPA/NXX of the originating number (636-528-81**) was
14 checked in the Local Exchange Routing Guide ("LERG") which indicated that Verizon
15 owned the telephone number. From information gathered on this call from the BI
16 AcceSS7 System, we were able to see that the Verizon customer actually placed a call to
17 one of our landline subscribers (660-882-87**) in Boonville, Missouri in the Kansas City
18 LATA. We obtained this information from the ORIG_CALLED_NPA; the
19 ORIG_CALLED_NXX, and the ORIG_CALLED_LINE fields from the AcceSS7 BI
20 data, which merely shows the telephone number originally called when a call is
21 forwarded to another number. The BI fields are not populated unless a call has been
22 forwarded. In addition, we were able to look into our Boonville switch and see that this

1 particular customer had call-forwarding activated to the specific terminating Mid-
2 Missouri telephone number (660-846-42**).

3
4 **Q. HOW WERE YOU ABLE TO DETERMINE THAT 68 OF THE 69 CALLS FROM**
5 **THE SEPTEMBER 12, 2002 DATA PROVIDED BY MID MISSOURI CAME**
6 **FROM CINGULAR WIRELESS, AND NOT FROM AN SBC MISSOURI**
7 **CUSTOMER, A SPRINT CUSTOMER OR A VERIZON CUSTOMER?**

8 A. SBC Missouri's AMA recordings showed that these 68 calls were wireless calls received
9 over a Cingular wireless trunk group at SBC Missouri's McGee tandem. First, the AMA
10 record itself, a Call Code 066 AMA record, is a cellular mobile carrier terminating type
11 record. This is a type of record that is generated for terminating a call from a cellular
12 mobile carrier and is used by SBC for billing purposes. The sensor identification number
13 in the AMA record shows what switch in our network generated the AMA record. The
14 sensor identification number for these 68 calls is sensor I.D. 199816, which shows that
15 these calls entered our network at the McGee tandem. And finally, the trunk group
16 number in the AMA Call Code 066 record shows in each case that these calls came into
17 the McGee tandem over a Cingular trunk group. This was confirmed in each case by the
18 trunk billing number that appeared in the AMA Call Code 066 record, which all were
19 billing numbers assigned to various Cingular trunk groups.

20
21 **Q. DID YOU ALSO REVIEW THE SCHEDULES MID-MISSOURI TELEPHONE**
22 **WITNESS DENISE DAY ATTACHED TO HER DIRECT TESTIMONY AS**
23 **HIGHLY CONFIDENTIAL SCHEDULES 3HC – 10HC?**

1 A. Yes. I started with the September 15, 2001 through October 16, 2001 data month for
2 which Mid-Missouri initially provided individual call detail on to us. This data was
3 categorized into calls Mid-Missouri claims were interLATA landline traffic originated by
4 SBC,² Verizon, Sprint and ALLTEL landline subscribers.

5
6 **Q. WHAT DID YOU FIND WHEN YOU ANALYZED THIS DATA?**

7 A. In studying the data pertaining to SBC, I found that Mid-Missouri's conclusion was
8 wrong in nearly every case. Mid-Missouri purportedly identified 543 calls as being
9 interLATA calls originated by SBC landline subscribers. I had each of these originating
10 numbers checked and found that 537 of the 543 calls were originated by wireless carriers.
11 We know this because the originating numbers identified by Mid-Missouri are not SBC
12 landline subscriber numbers. Rather, they are all assigned to wireless carriers. While
13 these numbers are part of a complete NPA NXX 10,000 number block originally assigned
14 to SBC and reside in an SBC end office switch, wireless carriers are permitted to obtain
15 numbers within these blocks when the wireless carrier interconnects on a Type 1 basis,
16 which is an interconnection at a telephone company end office rather than at a telephone
17 company access tandem. For the analysis here, we checked the originating number on all
18 543 of these calls by querying our end office switches to determine whether the particular
19 originating telephone number belonged to SBC or another carrier. As shown in Osburn
20 Schedule 3HC, all but six were originated by wireless carriers.

² I reviewed investigated the calls listed on Ms. Day's Schedule 3HC, which she claims shows "traffic originating from a SWBT exchange (OCN=9533) outside the 524 LATA and terminating to MMT (i.e., interLATA calls), that are a violation of section 'A.'"

1 **Q. WHAT CONCLUSIONS DID YOU REACH WITH REGARD TO THE SIX**
2 **REMAINING CALLS?**

3 A. Based on our research, these calls were not completed over SBC Missouri facilities. As
4 Mr. Hughes indicates in his testimony, SBC researched its billing records for these
5 customers and our business records reflect no calls from these customers terminating to
6 Mid-Missouri. To verify that SBC Missouri network would not complete these calls, I
7 had our network technicians make test calls to these numbers. In each case our switch
8 correctly routed the call to the interexchange carrier of the originating customers choice.

9 **Q. DID YOU REVIEW THE CALL INFORMATION FOR THE OTHER DATA**
10 **MONTHS CONTAINED IN MS. DAY'S SCHEDULE 3HC?**

11 A. Yes.

12
13 **Q. WHAT DID YOU FIND?**

14 A. Overall, we generally found the same mistakes that Mid-Missouri made with the
15 September 15, 2001 through October 16, 2001 data month. Including this first data
16 month, Mid-Missouri indicates that there were 10,344 interLATA calls originated by
17 SBC landline customers. Of those, we found that 10,166 were actually calls from
18 wireless subscribers.

19
20 **Q. DOES MS. DAY'S SCHEDULE 3HC SHOW THAT SBC IS IMPROPERLY**
21 **ORIGINATING AND TERMINATING INTERLATA CALLS AS MID-**
22 **MISSOURI TELEPHONE CLAIMS?**

1 A. No. We were able to determine that of the 10,344 calls listed in Ms. Day's Schedule
2 3HC, 10,166 (98.3%) were wireless calls. We made this determination by comparing the
3 originating numbers shown on this schedule with the list of known Cingular Type 1 line
4 side connections from our investigation of the first data month from Ms. Day's Schedule
5 3HC and the results of our September 12 investigation. We then individually researched
6 the originating numbers on Ms. Day's Schedule.

7
8 **V. CONCLUSION**

9 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.**

10 A. SBC Missouri has not violated the Commission's blocking order as alleged by Mid
11 Missouri. I was personally involved in establishing the blocking associated with the
12 Commission's August 2000 Order. In compliance with the Commission's Order, SBC
13 Missouri has blocked 179 trunk groups with 21,834 trunks.

14
15 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

16 A. Yes.