BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

REPLY TO MITG

This reply corrects misimpressions from the Missouri Independent Telephone Group's ("MITG's") May 14, 2002 Response concerning the position of ALLTEL Missouri, Inc., Sprint Missouri, Inc., Southwestern Bell Telephone Company,1 and Verizon[2] (collectively the "large local exchange carriers" or "large LECs") on Ordering and Billing Forum Issue 2056 ("OBF Issue 2056").

l. Application of OBF Issue 2056. MITG claims that the large LECs[3] have taken the position that "OBF Issue 2056 does not apply to traffic on the Feature Group C common trunks -- the traffic for which this docket was created ,,,4 and that they are "attempting to preclude OBF 2056 from being implemented for traffic traversing the ... common trunks."[5]

MITG is incorrect. As the large LECs explained in their April 19, 2002 Responses to Staff s questions, OBF Issue 2056 amended and was incorporated into the Multiple Exchange Carrier Access Billing ("MECAB") guidelines, resulting in MECAB Issue 7. The MECAB guidelines provide the recommended standard for the billing of access and interconnection services provided by two or more providers or by one provider in two or more states within a

Southwestern Bell Telephone Company, L.P., d/b/a Southwestern Bell Telephone Company, will be referred to in this pleading as "Southwestern Bell" or "SWBT."

2 GTE Midwest Incorporated, d/b/a Verizon Midwest will be referred to as "Verizon."

3 MITG incorrectly labels the large LECs as "former PTCs." While Sprint, SWBT and Verizon served as Primary Toll Carriers ("PTCs') during the existence of the PTC Plan, ALLTEL was a Secondary Carrier ("SC") under the Plan.

MITG Response, p. 1.

5 Id., p. 5.

single LATA. Although OBF Issue 2056 addresses IXC-handled traffic, OBF Issue 2056 and MECAB 7 also have application to other types of traffic including intraLATA toll, wireless and local services.[6]

Given the uniform method LECs across the country use in handling, originating and terminating IXC traffic, the application of OBF 2056 to IXC traffic is very specific: With implementation of OBF 2056, the end office LEC is no longer required to produce and send 1150 summary records upstream to other LECs on the call path. Instead, MECAB 7 provides for the implementation of a record exchange process based on 1101 records for IXC-carried traffic, and prescribed an August 31, 2002 implementation deadline.

But because both the methods employed by and the recording capabilities of LECs across the country varied with respect to other types of traffic, a single, uniform standard could not be required by OBF 2056 and MECAB 7 for intraLATA toll, wireless and local traffic. While a preference for the exchange of 1101 records was expressed, the standard recognized and accepted that other alternatives exist throughout the country, and did not purport to mandate changes or to override existing state settlement arrangements. Accordingly, the large LECs indicated that OBF 2056 and MECAB 7 did not require changes to the 92 record exchange system used by the large LECs (and Spectra) or to the modified category 11 records cooperatively developed and agreed upon by the former PTCs and the small LECs (MITG and STCG) when the PTC plan ended. The large LECs also explained that there similarly was no requirement to modify the Commission-mandated Cellular Transiting Usage Summary Report ("CTUSR") currently being provided by some of the large LECs to report transited wireless

[6] **Large LFC, April 19, 2002, Response to Staff Questions, p. 1; MECAB 7, p. I-1.**
[7] **MECAB 7, Section 6.5 states; "while the industry recognized as settlement plans between LECs are used, these are state or contract-specific and are not included in the MECAB guidelines."**

traffic.

2. How the application of OBF Issue 2056 will reduce unidentified traffic. MITG attempts to portray the large LECs -- particularly Verizon -- as changing position in this case, by first arguing that OBF Issue 2056 would reduce or eliminate disputes regarding unidentified traffic and later claiming that OBF Issue 2056 does not apply. [8]

Contrary to MITG's claim, no change in position has occurred. As Verizon explained during the hearing, OBF Issue 2056 will help the unidentified traffic problem by filling gaps in the existing record exchange procedures. Specifically, Verizon's witness stated: "if a LEC does not have the ability to record its own usage, Issue 2056 contains a process by which the provider can obtain copies of records from the originating, transiting or terminating provider."[9] The April 19, 2002 large LEC response to Staff s questions was completely consistent with this position. In their response, the large LECs stated:

> Under OBF 2056: Each company generates their official recording (Originating Company, Tandem Company, Terminating Company). However, when a company does not have detailed records to produce an accurate, timely and auditable bill, a company may obtain copies of detailed records (when available) from another company (i.e., Originating Company or Tandem Company). Section 6 of MECAB 7 provides: "In lieu of recordings, where compensation does exist, alternative methods and associated data (i.e., T/O ratio, flat rate, etc.) may be developed and shared between companies." [10]

As the large LECs explained in their response, the application of OBF Issue 2056 allows the party that cannot record the traffic to obtain usage information from companies that have such capabilities. And concrete steps are being taken to accomplish this. For example, during the first industry meeting sponsored by Staff on this issue, SWBT shared details on its efforts to provide more information to downstream LECs on traffic that transited its network. This

[8] MITG Response, p. 5.
[9] Rebuttal Testimony of Kathryn Allison, filed December 20, 2000 at p. 1,6.
[10] Large LEC Response to Question 1(b)i-ii; 1(I); 1(h).

exchange of information will help carriers identify and bill for traffic that is currently unidentified and is fully consistent with the principles inherent in the MECAB process.

Contrary to MITG's assertions, the industry is not at "impasse."11 Rather, as Staff s May 7, 2002 Report reflects, the parties are continuing to meet and work collectively on these issues.

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" MITG Response, p. 6.

CERTIFICATE OF SERVICE

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