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January 19, 2001

FILED²

JAN 19 2001 *ms*

Missouri Public
Service Commission

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

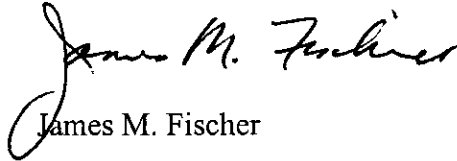
RE: *In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangements, and Traffic Measurement, Case No. TO-99-593*

Dear Mr. Roberts:

The purpose of this letter is to inform the Commission and the parties of record that Fidelity Telephone Company has not filed testimony in this phase of the proceeding, and does not intend to file a Position Statement for the issues raised in this phase of the proceedings. In addition, Fidelity does not intend to actively participate in the hearings, but reserves the right to file briefs, if necessary, at the conclusion of the proceeding. A copy of the foregoing has been hand-delivered or mailed this date to each party on the attached Service List.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr

cc: Counsel of Record

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

FILED²

JAN 19 2001ms

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

Case No. TO-99-593

Missouri Public
Service Commission

**POSITION STATEMENT OF GTE MIDWEST INCORPORATED
D/B/A VERIZON MIDWEST**

COMES NOW GTE Midwest Incorporated d/b/a Verizon Midwest ("Verizon") and submits the following Position Statement regarding the Proposed List of Issues submitted by the parties for the evidentiary hearing to be held in this case on January 24-26, 2001:

1. This case was established pursuant to the Report and Order that the Missouri Public Service Commission ("Commission") issued on June 10, 1999, in Case No. TO-99-254.

2. On January 17, 2000, the parties submitted and identified the following list of contested issues, although not all agree every identified issue is a proper subject for decision by the Commission in this case. Verizon will indicate its position on these issues in the same order submitted to the Commission.

65

POSITION OF VERIZON ON CONTESTED ISSUES

1. **Signaling Protocols.** Is it necessary for the Commission to decide in this case what signaling protocols should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

Position of Verizon:

No. There is no disagreement among the parties on this issue that needs to be resolved at this time.

2. **Traffic Measurement.** How and where should intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs be measured for purposes of terminating compensation?

Position of Verizon:

For traffic that originates with an ILEC and transits an ILEC tandem, the originating ILEC should produce the appropriate 92 record or Category 11 billing record to be provided to all parties on the call route.

For traffic that originates with a CLEC or a wireless provider that transits the ILEC tandem, the terminating ILEC, in the absence of an originating billing record from the CLEC or wireless provider, may request a billing record from the transiting ILEC tandem owner. The adoption of OBF Issue 2056 by the Missouri telecommunications industry would accomplish this process. Until such time as OBF Issue 2056 is implemented, Verizon will

continue to submit the Cellular usage summary report for wireless originated traffic.

3. **Call Records.** What call records should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

Position of Verizon:

See Response to No. 2 above. At present, there is not an industry standard for terminating switch recording, for purposes of the billing of intrastate, intraLATA traffic. The industry standard for recording is an originating 006 call record which is converted into a 92 billing record (or Category 11 billing record in Missouri) for billing purposes. The use of the 119 terminating call record is only appropriate for the billing of access on a dedicated trunk group. Consequently, Verizon recommends the use of originating call records for billing purposes for intrastate, intraLATA traffic generally. The adoption of OBF Issue 2056 will fill in any gaps in the existing record exchange process.

4. **Trunking Arrangements.** What changes, if any, should be made to the existing common trunking arrangements between the former PTCs and the former SCs?

Position of Verizon:

Verizon does not believe that any changes need to be made in the existing common trunking arrangements between the former PTCs and the former SCs.

5. **Business Relationships.** What business relationship should be utilized for payment for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

Position of Verizon:

Verizon does not believe that any change in the existing business relationship is required. Furthermore, Verizon disagrees with the small ILEC's contention that a tandem switch owner should pay for unidentified traffic that transits its common trunk group.

6. **Call Blocking.** What procedure or arrangement, if any, should be utilized to prevent noncompensated intrastate intraLATA traffic from continuing to terminate over the common trunks between the former PTCs and the former SCs?

Position of Verizon:

Under Section 251(a)(1) of the Telecommunications Act of 1996 ("Act"), each telecommunications carrier has the duty to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers. Therefore, CLECs and wireless providers can and should negotiate arrangements for interconnection with any relevant carrier. To effectively block traffic, Verizon would have to block traffic for all carriers, or allow all

SERVICE LIST
January 19, 2001
Case No. TO-99-593

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class mail, postage prepaid, this 19th day of January, 2001, to:

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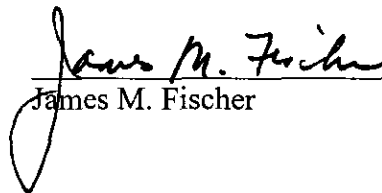
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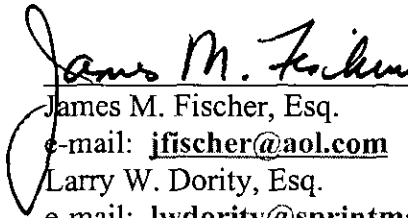
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James M. Fischer

carriers' traffic to pass. To selectively block traffic of only nonpaying carriers would require a manual tracking process that would be costly, time consuming and subject to errors.

Respectfully submitted,



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