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**Sent:** Friday, October 29, 2004 10:41 AM  
**Attach:** sceftpwr2.doc  
**Subject:** SBC wireless terminating traffic records

Leo:

At the September 2 agenda session discussion of the Enhanced Record Exchange Rule, the Commissioners expressed interest in the small company's experience with SBC's new wireless terminating records replacing the CTUSR.

I attach a summary of that experience, which is being provided to Staff and the Commissioners as well. As you can see, we have some items for which we need more information from SBC. We would like a meeting between representatives of SBC and the small companies in the next few weeks to pursue these items further.

Can you provide us with some available dates in November?

Thank you.

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Schedule RCS-7

10/29/2004

**SUMMARY of Small Rural ILEC experience with SBC's conversion of CTUSR terminating wireless traffic summary report to a File Transfer Protocol (FTP) consisting of IXC type electronic call detail records.**

**October 28, 2004  
Trip England, Craig Johnson**

1. New FTP mechanized wireless records

On March 18, 2004, SBC announced that new wireless to landline mechanized call records would replace the CTUSR (Cellular Terminating Usage Summary Report) throughout SBC's 5 state region. This announcement was updated on April 23, 2004. SBC's announcement indicated the final CTUSR would cover June 6 to July 4, that SBC would only retain the new records 90 days, that SBC reserved the right to change this new record format, and that SBC will incur no liability, even if it canceled or modified the new record.

As SBC planned the implementation of this new record format without consulting with the small companies regarding the new format, we requested and obtained a May 5, 2004 conference call with SBC to discuss this further. According to SBC then, the new record format was a standard ATIS/OBF EMI Category 11-01-XX record for wireless to landline traffic. The records would be provided with a CIC of "0000" in positions 46-69, the position 91 indicator 10 would be populated with an "8" indicating the call is "cellular terminated", the position 146 BSA/Feature Group ID Code field would be populated with a blank " " indicating the CIC is equal to 0000, position 167-170 is the "originating OCN" field that would be populated with the state specific OCN of the wireless carrier that sent the call to the LEC to LEC network.

Consistent with Category 11 record formats, the small companies expected the new record would provide the originating caller's number. It did not. The failure to provide the calling party number contradicts the current draft of the Enhanced Record Exchange Rule. The lack of a true originating calling number will preclude the development of sufficient information to evaluate or further refine interMTA, intraMTA, interstate, and intrastate traffic factors in the future. It would also preclude any attempt to determine the feasibility of relying upon actual call detail instead of factors.

The small companies revisited the content of SBC's new record when it was discovered the record did not provide the caller's phone number, as does a true Category 11 record. According to SBC's September 30, 2004 email to Renee Reeter, a Telcordia document entitled "Generic Requirements for Wireless Service Provider (WSP) Automatic Message Accounting (AMA) number "GR-1504-CORE, Issue 4, May 2003" addresses numerous wireless record and recording issues. Section 3.8 of this document purportedly provides:

- a. when generated for a terminating Type 1 interconnection the originating number fields shall contain the billing directory number of the line-side interface directly connected to the WSP, as assigned by the LEC;
- b. for terminating Type 2A interconnection the originating number fields shall contain the per trunk group billing number of the WSP, as assigned by the LEC, to the interface directly connected to the WSP;
- c. when generated for a terminating Type 2B interconnection, the originating number fields shall contain the per trunk group billing number of the WSP, as assigned by the LEC, to the interface directly connected to the WSP;
- d. for terminating Type 1 and Type 2B interconnections, the terminating number fields shall contain the called party number;
- e. for terminating Type 2A interconnections, the terminating number fields shall contain the called party number.

The small companies are in the process of studying this new information, and will be studying its consistency with other "industry standards". In the meantime, the following will provide some observations regarding the new record format.

2. Format Report Period Overlap:

- a. Last paper CTUSR covered June 5, 2004 to July 4, 2004.
- b. First FTP call detail records covered different periods of time for different small ILECs
- c. Therefore there is some overlap between last CTUSR period and first FTP period, but the precise overlap period will be different for different small ILECs.

3. Potential Volume Discrepancies:

- a. Small companies believed FTP volumes would not be subject to CTUSR volume variances. Apparently this is not true. SBC will continue to provide batches of records that, due to "backlog", can contain more or less than 30 days worth of records. Given this, it is difficult to accurately rely upon the FTP records to see traffic trends.
- b. Mid-Missouri reports the FTP volumes have been less than previous CTUSR volumes by 20%, suggesting possible FTP under-reporting.
- c. Green Hills reported FTP volumes exceeded CTUSR volumes by 9 to 11 %, suggesting possible previous CTUSR under-reporting.

4. Lack of originating caller number:

See # 1 above. The FTP call detail did not contain originating caller NPA/NXX information. The FTP call detail lists individual carriers by operating company number (OCN). Instead of the originating caller's NPA/NXX, the FTP indicates all call originated with a number or numbers that appear to be assigned to SBC trunks.

The FTP records from SBC reflect the following carriers, assigned OCNs, and telephone numbers assigned to all calls supposedly originated by, and the financial responsibility of, the corresponding wireless carrier:

Carrier	OCN	Telephone Numbers
AT&T Wireless	6010	913-362-7026
SWB Mobile Sys-MO	6029	816-225-0006
United States Cellular	6275	660-651-9999
Alltel Comm Wireless-MO	6295	816-233-0109
T-Mobile USA	6529	816-221-5558
Southwestern Wireless TX	6671	913-677-4860
"	"	913-831-7693
"	"	913-831-7750
Sprint Spectrum	8454	660-826-7966
"	"	816-210-9512
"	"	816-294-0000
"	"	913-963-0000
Verizon Wireless	5814	816-591-0066

5. Southwestern Wireless Texas:

Southwest Wireless Texas is a carrier that was not identified in several years of use of the CTUSR format. SBC's initial FTP directed that all of this carrier's traffic was "interstate".

Further LERG research suggested Southwestern Wireless Texas was a Cingular affiliate that MITG companies' approved Traffic Termination Agreements applied to. These MITG companies will be billing this traffic with other Cingular traffic as the approved TTA factors specify.

6. US Cellular Traffic:

a. Mid-Missouri reported that the FPT information for July 19 to August 19 reflected that US Cellular traffic dropped from an average of 24,000 MOU per month to zero reported MOU. Mid-Missouri initiated contact with SBC Rene Barientos, who required Mid-Mo to fill out a trouble report, and then assigned the matter to Susan Murphy of SBC. Ms. Murphy's Sept 28 response suggested perhaps US Cellular (OCN

6275) had sold off its Missouri properties. She also indicated the volumes could fluctuate because of "backlog". The MITG companies are not aware that US Cellular has sold its Missouri operations, or stopped delivering traffic to SBC for termination.

As of October 28 this has not been resolved.

7. Alltel Wireless Traffic:

In response to invoices sent by some MITG companies to Alltel Wireless, which were based on SBC traffic reports of Alltel Wireless traffic terminating on SBC trunks, Alltel's Jan Stoiber responded indicating the billing end offices "has not been migrated" on the Alltel network, and should be billed to MCI WorldCom.

Mid-Missouri contacted Shawn Conway of MCI, who indicated Alltel's response was in error. He indicated MCI is the underlying carrier for Alltel CIC 5253 in the Pilot grove PLGVMOXA10T area, but not for traffic terminating on SBC trunks. He informed Mid-Missouri that MCI would not be responsible for the Alltel traffic as Alltel had claimed. MCI's Conway also indicated he contacted Alltel's Jana Stoiber and informed her that Alltel's invoice response was in error. To date Alltel has not retracted its response to Mid-Missouri invoices. Instead Alltel has directed some companies to provide their invoices to a third party vendor selected by Alltel for review.

Green Hills was told by Alltel that Alltel's invoice dispute was a mistake, and Alltel was looking into either making payment or sending a new dispute letter.

As of October 28 this has not been resolved.

8. New wireless carrier traffic. One small company reported that the FTP records indicate traffic that is attributed to Verizon Wireless and Nextel, whereas no such traffic was attributed by the CTUSR to those carriers.

(end of document, 10-28-04)