

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

Socket Telecom, LLC,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>Case No. TC-2008-0225</u></b>
	)	
CenturyTel of Missouri, LLC, and	)	
Spectra Communications Group, LLC,	)	
d/b/a CenturyTel,	)	
	)	
Respondents.	)	

**RESPONSES OF CENTURYTEL OF MISSOURI, LLC AND SPECTRA  
COMMUNICATIONS GROUP, LLC D/B/A CENTURYTEL TO FIRST SET OF  
DATA REQUESTS FROM SOCKET TELECOM, LLC**

CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, d/b/a CenturyTel (collectively, "CenturyTel"), pursuant to Commission Rule 4 CSR 240-2.090(2), hereby provide their responses to the First Set of Data Requests submitted by Socket Telecom, LLC ("Socket"), subject to prior objections and reasons for their inability to answer within twenty days served on Socket dated January 8, 2009.

**DATA REQUESTS/RESPONSES**

**DATA REQUEST NO. 2:**

To the extent not included in the response to the preceding data request, provide copies of all total traffic calculations for traffic exchanged between Socket and CenturyTel for the months of February, March, April, and May of 2007. For each study, identify the date the calculation was performed, identify the person or persons responsible for performing the calculations, and state whether the calculations relied upon SS7 records as the source of the data from which the total traffic was calculated.

**RESPONSE:** Subject to its objections, CenturyTel states: To the extent CenturyTel is able to provide appropriate responses from detailed, archived information that is no longer readily available, CenturyTel previously advised Socket of its inability to respond within the twenty (20) day limit and stated that it intends to provide any response by January 31, 2009.

Jennifer Powell / Susan Smith

**DATA REQUEST NO. 3:**

State the date that CenturyTel first began performing total traffic calculations for the traffic exchanged between Socket and CenturyTel using the methodology described by Ms. Jennifer Powell on pages 3-5 of her Rebuttal Testimony filed in this case.

**RESPONSE:** Subject to its objections, CenturyTel states: It is unclear what is meant by the term "total" traffic calculations. CenturyTel began producing traffic studies using the methodology described by Ms. Powell effective July 15, 2007.

Jennifer Powell / Susan Smith

**DATA REQUEST NO. 5:**

State the date that CenturyTel first began converting SS7 detail into traffic data for use in traffic calculations for the traffic exchanged between Socket and CenturyTel.

**RESPONSE:** Subject to its objections, CenturyTel states: Effective October 2006, CenturyTel began putting processes in place to begin measuring and calculating traffic thresholds as prescribed in the Agreement. It was found that the SS7 records were the only records available that contained the required information. The initial report was produced July 2007. See Response to Data Request No. 16.

Jennifer Powell / Susan Smith

**DATA REQUEST NO. 9:**

Did CenturyTel establish or produce the traffic measurement methodology described by Ms. Powell in her Rebuttal Testimony filed in this case, or was it obtained from a non-affiliated third party? If obtained from a non-affiliated third party, identify such entity.

**RESPONSE:** Subject to its objections, CenturyTel states: CenturyTel developed the method for specifically measuring Socket local traffic.

Jennifer Powell

**DATA REQUEST NO. 26:**

Provide copies of all correspondence and documents related to any agreement or decision that "all CenturyTel-provided facilities relating to the existing Spectra Communications POI would be converted to special access tariffed pricing" as discussed on Page 4 of the Rebuttal Testimony of Pam Hankins filed in this case, state whether CenturyTel contends that Socket agreed to such pricing conversion, and if so state which representative(s) of Socket communicated such agreement.

**RESPONSE:** Subject to its objections, CenturyTel states: Documentation was provided as Schedules SS-3 and SS-4 to Ms. Smith's Rebuttal Testimony.

Susan Smith / Pam Hankins

**DATA REQUEST NO. 27:**

Provide copies of any analysis, correspondence, and documents relating to the "review of the existing tariffs that took place to determine the most cost-efficient pricing" discussed on Page 4 of the Rebuttal Testimony of Pam Hankins filed in this case, state whether CenturyTel contends that Socket participated in such review, and if so state which representative(s) of Socket participated.

**RESPONSE:** Subject to its objections, CenturyTel states: CenturyTel does not have any information responsive to this request.

Pam Hankins / Charles Di Giulian

**DATA REQUEST NO. 28:**

For each line item in charges set out in the Proprietary Schedule PH-1 attached to the Rebuttal testimony of Pam Hankins filed in this case, itemize each facility/service being billed and provide the circuit ID or IDs of the facilities, the associated line item or rate element name(s), the rate(s) being billed, and quantities that comprise the current charges.

**RESPONSE:** See Objection.

**DATA REQUEST NO. 30:**

Please provide any documents related to any demonstration by Spectra Communications Group, LLC to the Missouri Public Service Commission that a point of interconnection requested by Socket in the Houston exchange was not technically feasible.

**RESPONSE:** Subject to its objections, CenturyTel states: CenturyTel does not have any information responsive to this request.

Susan Smith

**DATA REQUEST NO. 31:**

Provide copies of all invoices sent to CenturyTel of Missouri, LLC or Spectra Communications Group, LLC by another telecommunications carrier for providing transit services to transport and switch traffic that is originated by either CenturyTel of Missouri, LLC's or Spectra Communications Group, LLC's end-users and terminated to Socket. For each invoice, state how much of the invoice amount has been paid. In addition, provide copies of all correspondence and documents relating to such invoices or to a third-party transit provider requesting that CenturyTel of Missouri, LLC or Spectra Communications Group, LLC enter into a contractual relationship regarding provision of transit services by such third-party to either CenturyTel entity.

**RESPONSE:** See Objection.

**DATA REQUEST NO. 39:**

Identify the third party supplier of interoffice circuits referenced in line 11 on page 4 of Mr. Teasley's rebuttal testimony filed in this case.

**RESPONSE:** Subject to its objections, CenturyTel states: The third party referenced in line 11 - 14 on page 4 ultimately became Genuity, which later went into bankruptcy. These same interoffice facilities were acquired by Level 3, who later sold them to Lightcore.

Ralph Teasley



**DATA REQUEST NO. 40:**

Identify the other carriers who provide transport facilities for connections to/from each Spectra Communications Group exchange as stated on page 5 of Mr. Teasley's rebuttal testimony filed in this case.

**RESPONSE:** Subject to its objections, CenturyTel states as follows: Testimony on page 5, starting at line 9 describes how a customer may choose an inter-exchange carrier (IXC) to transport their intralata call to another Spectra exchange. A complete list of FGD carriers can be found at [www.nanpa.com](http://www.nanpa.com) by clicking on Numbering Resources – then clicking on Carrier Identification Codes (CIC), then clicking on View Feature Group D CIC assignments

Spectra customers can also choose Spectra as their intralata toll provider. This traffic would be routed to the respective tandem switch over the leased facilities described in DR 39.

Ralph Teasley

Dated: January 20, 2009

Respectfully submitted,

FISCHER & DORITY, P.C.

/s/ **Larry W. Dority**

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**ATTORNEYS FOR CENTURYTEL OF  
MISSOURI, LLC and SPECTRA  
COMMUNICATIONS GROUP, LLC,  
d/b/a CENTURYTEL**

**CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically served on counsel for Socket Telecom, LLC (at clumley@lawfirmemail.com; lcurtis@lawfirmemail.com) on this 20<sup>th</sup> day of January, 2009.

**/s/ Larry W. Dority**

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Larry W. Dority

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

Socket Telecom, LLC,	)	
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Complainant,	)	
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	)	
CenturyTel of Missouri, LLC, and	)	
Spectra Communications Group, LLC,	)	
d/b/a CenturyTel,	)	
	)	
Respondents.	)	

**ADDITIONAL RESPONSES OF CENTURYTEL OF MISSOURI, LLC AND  
SPECTRA COMMUNICATIONS GROUP, LLC D/B/A CENTURYTEL TO  
FIRST SET OF DATA REQUESTS FROM SOCKET TELECOM, LLC**

CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, d/b/a CenturyTel (collectively, "CenturyTel"), pursuant to Commission Rule 4 CSR 240-2.090(2), hereby provide their additional responses to Data Requests No. 1.2, 2, 4, 15, 21, 28, 31, 36 and 38 in the First Set of Data Requests submitted by Socket Telecom, LLC ("Socket"), subject to prior objections and reasons for their inability to answer within twenty days served on Socket dated January 8, 2009, as noted in CenturyTel's Responses of January 20, 2009.

**DATA REQUEST NO. 2:**

To the extent not included in the response to the preceding data request, provide copies of all total traffic calculations for traffic exchanged between Socket and CenturyTel for the months of February, March, April, and May of 2007. For each study, identify the date the calculation was performed, identify the person or persons responsible for performing the calculations, and state whether the calculations relied upon SS7 records as the source of the data from which the total traffic was calculated.

**RESPONSE:** Subject to its objections, CenturyTel states: No such traffic calculations were performed for the above-referenced months of February, March, April and May of 2007.

Jennifer Powell

**DATA REQUEST NO. 28:**

For each line item in charges set out in the Proprietary Schedule PH-1 attached to the Rebuttal testimony of Pam Hankins filed in this case, itemize each facility/service being billed and provide the circuit ID or IDs of the facilities, the associated line item or rate element name(s), the rate(s) being billed, and quantities that comprise the current charges.

**RESPONSE:** Subject to its objections, CenturyTel states: Please see **PROPRIETARY Schedules 28 A and 28 B**, attached.

Pam Hankins

**DATA REQUEST NO. 31:**

Provide copies of all invoices sent to CenturyTel of Missouri, LLC or Spectra Communications Group, LLC by another telecommunications carrier for providing transit services to transport and switch traffic that is originated by either CenturyTel of Missouri, LLC's or Spectra Communications Group, LLC's end-users and terminated to Socket. For each invoice, state how much of the invoice amount has been paid. In addition, provide copies of all correspondence and documents relating to such invoices or to a

third-party transit provider requesting that CenturyTel of Missouri, LLC or Spectra Communications Group, LLC enter into a contractual relationship regarding provision of transit services by such third-party to either CenturyTel entity.

**RESPONSE:** Subject to its objections, CenturyTel states:

To date, CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, d/b/a CenturyTel have not received invoices from another telecommunications carrier for providing transit services; and indeed, CenturyTel & Spectra have not made such claims in their testimony. Nevertheless, CenturyTel and Spectra are clearly at risk for such transiting charges as AT&T and other transit providers are billing CenturyTel ILECs and CLECs in a number of states for providing transit services to transport the calls terminating to a third party through their tandem (including facility and tandem switching charges). As shown in the attached **PROPRIETARY SCHEDULES 31A AND 31B**, AT&T has presented contracts to CenturyTel of Missouri seeking compensation. AT&T is already collecting compensation in other states for transiting services.

As an illustration of the type of impact this would have on CenturyTel of Missouri and Spectra, the following example was provided in response to Staff DR #9 in Case. No. TC-2007-0341:

In the case of Ellsinore, Socket has an existing POI with AT&T in St. Louis, MO, not Sikeston, MO. Spectra and AT&T would be responsible for the approximate 162 miles of transport from Ellsinore to St. Louis, while Socket and Socket's customer are responsible for less than a mile of transport. In addition, Spectra maintains the risk of future transiting charges to AT&T in Sikeston and St. Louis, that would exceed \$2000 per month for this one customer based upon existing AT&T transit contract rates.

Susan Smith

Dated: February 4, 2009

Respectfully submitted,

FISCHER & DORITY, P.C.

/s/ **Larry W. Dority**

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**ATTORNEYS FOR CENTURYTEL OF  
MISSOURI, LLC and SPECTRA  
COMMUNICATIONS GROUP, LLC,  
d/b/a CENTURYTEL**



**CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically served on counsel for Socket Telecom, LLC (at [clumley@lawfirmemail.com](mailto:clumley@lawfirmemail.com); [lcurtis@lawfirmemail.com](mailto:lcurtis@lawfirmemail.com)) on this 4<sup>th</sup> day of February, 2009.

/s/ **Larry W. Dority**

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Larry W. Dority