Exhibit No:
Issues: Calling Party Number ('CPN")
Witness: Chris Read
Type of Exhibit: Direct Testimony
Sponsoring Party: Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri
Case No: TE-2006-0053

SOUTHWESTERN BELL TELEPHONE, L.P.
d/b/a AT&T MISSOURI

CASE NO. TE-2006-0053

DIRECT TESTIMONY

OF

CHRIS READ

Dallas, Texas

March 24, 2006

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, for A Waiver of Certain Requirements of 4 CSR 29.040(4).	))))	Case No. TE-2006-0053

AFFIDAVIT OF CHRIS READ

STATE OF TEXAS)
) SS
COUNTY OF _Rockwall_____)

I, Chris Read of lawful age, being duly sworn, depose and state:

1. My name is Chris Read. I am presently Senior Business Manager for AT&T Services, Inc.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Chris Read

Subscribed and sworn to before me this 24th day of March, 2006.

Notary Public

My Commission Expires: Jan 25, 2009

Jerri L Peiffer
Notary Public, State of Texas
My Commission Expires:
January 25, 2009

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Chris Read. My business address is Two SBC Plaza, Floor 11, Dallas, Texas 75202.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am employed by AT&T Services, Inc., and my current position is Senior Business Manager, within the Information Technology organization.

Q. HAVE YOU PREPARED AN EXHIBIT THAT SUMMARIZES YOUR PROFESSIONAL AND EDUCATIONAL BACKGROUND AND EXPERIENCE BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION ("COMMISSION")?

A. Yes. This information is contained in Read-Schedule 1.

II. PURPOSE AND MAIN POINTS OF TESTIMONY

Q. WHAT IS THE ISSUE IN THIS CASE?

A. The hearing in this case has been bifurcated into two phases. In this first phase, the issue is:

> Does Commission Rule 4 CSR 240-29.040(4) require the originating tandem carrier to include the Calling Party Number ("CPN") as part of the Category 11-01-XX record that it provides for wireless-originated calls that transit the LEC-to-LEC network and terminate to other LECs?

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony explains, primarily from an intercompany billing records and data processing perspective, why Rule 4 CSR 240-29.040(4) of the Commission's Enhanced Records Exchange rules does not, and should not, require originating tandem carriers (like AT&T Missouri) to include Calling Party Number ("CPN") as part of the Category 11-01-XX billing records it provides for wireless-originated calls that transit the LEC-to-LEC network and terminate to other LECs.

Q. WHAT ARE THE MAIN POINTS OF YOUR TESTIMONY?

A. The main points I would like to make in my testimony are:

- Neither the text nor the purpose of Commission rule 29.040(4) requires tandem carriers to include CPN in the Category 11-01-XX records for wireless-originated calls.
  - Rule 29.040's stated purpose is to identify carriers that originate traffic transmitted over the LEC-to-LEC network. This information is needed by terminating carriers so that they know which carrier to bill.
  - AT&T Missouri's wireless Category 11-01-XX records, in compliance with the rule and industry standards, identifies such carriers by providing the Operating Company Number ("OCN"). The provision of this and other information contained in AT&T Missouri's record gives terminating carriers all the information they need to render bills for intercompany compensation to wireless carriers.
  - CPN does not identify the originating carrier on wireless-originated calls and cannot be used for billing intercompany compensation on wireless-originated calls because of its inherent unreliability.
- Industry Standards do not support Rule 29.040(4) requiring CPN to be included as part of the Category 11-01-XX records for wireless-originated calls.

- Industry standards for wireless identification as set out in the OBF EMI guidelines require wireless Category 11-01-XX records to contain OCN, not CPN.

- The Lucent switches' technical inability to record CPN on wireless-originated calls and other carriers' records confirm that industry standards do not require CPN to be included in the wireless Category 11-01-XX record.

- Interpreting Rule 29.040(4) to require CPN on billing records would (1) require AT&T Missouri to pay Lucent Technologies $1 million or more to develop that technical capability for AT&T Missouri's Lucent switches, (2) require very substantial and burdensome changes to AT&T Missouri's internal information processing systems used to generate intercompany billing records; and (3) produce little, if any, benefit to AT&T Missouri or to the carriers that use AT&T Missouri's Category 11-01-XX for intercarrier billing purposes.

- The Commission could not have intended to adopt a rule requiring the provision of CPN on wireless originated calls without first considering the evidence on current industry standards, what is currently being provided, whether it was technically capable of being provided, and at what cost. The Commission did not gather any evidence on these issues in the course of the rulemaking because the proposed rule did not require CPN to be provided on billing records associated with wireless-originated calls. Had the rule proposed to require CPN, AT&T Missouri and other companies would have explained that such a requirement was not currently feasible and expensive and time consuming to develop. That the proposed rule did not require CPN on billing records for wireless-originated traffic is also made clear from written comments filed by the small LECs in the rulemaking.

III. NEITHER THE TEXT NOR THE PURPOSE OF RULE 29.040(4) REQUIRES CPN TO BE INCLUDED IN WIRELESS CATEGORY 11 BILLING RECORDS

Q. DOES RULE 29.040(4) REQUIRE CARRIERS TO INCLUDE CPN IN THE CATEGORY 11-01-XX INTERCARRIER BILLING RECORDS THEY CURRENTLY PROVIDE ON WIRELESS-ORIGINATED CALLS?

A. No. Rule 29.040(4) does not impose such a requirement. It merely requires the provision of a Category 11-01-XX billing record:

> (4) When transiting traffic for any carrier other than an incumbent local exchange carrier, originating tandem carriers shall, for each compensable call, create and make the following available upon request by a terminating carrier, at no charge to the terminating carrier:
>
> (A) A category 11-01-XX record or, if no Carrier Identification Code is available, a Missouri-specific category 11-01-XX record.
>
> (B) Nothing in (A) above shall preclude two carriers from mutually agreeing to exchange other types of billing records.
>
> (C) A list of originating carriers connected to their tandem switch who originate traffic on the LEC-to-LEC network. The originating tandem carrier will ensure this list of originating carriers is readily accessible to any carrier involved in the completion of such calls. The originating tandem carrier will maintain the following information for carriers using its tandem switch to originate traffic on the LEC-to-LEC network:
>
> 1. The name of the originating carrier plus the name, mailing address, telephone number and electronic address of an individual responsible for contacts regarding LEC-to-LEC network traffic billing and payment inquires.

Q. DOES AT&T MISSOURI CURRENTLY PRODUCE CATEGORY 11 RECORDS IN ACCORDANCE WITH THE RULE?

A. Yes. AT&T Missouri produces Category 11 records in accordance with the rule. Its records for wireless-originated traffic accurately identify the carrier responsible for payment by using industry standard Operating Company Number ("OCN") codes. AT&T Missouri (then doing business as SBC Missouri) notified carriers in Missouri through an Accessible Letter issued March 18, 2004 that it was going to start providing individual detail Category 11-01-XX records on wireless-originated traffic. A copy of

this letter is attached to my testimony as Read-Schedule 2. AT&T Missouri provided additional information about these new records in a letter issued on April 22, 2004 (a copy of this letter is attached as Read-Schedule 3). AT&T Missouri began providing these records in June, 2004. AT&T Missouri notified carriers of enhancements to these records in an Accessible Letter issued November 29, 2004 (a copy of this letter is attached as Read-Schedule 4.)

Q. WHAT IS THE TITLE OF RULE 29.040?

A. The title is:

> **4 CSR 240-29.040 Identification of Originating Carrier for Traffic Transmitted Over the LEC-to-LEC**

Q. WHAT IS THE PURPOSE OF RULE 29.040?

A. The purpose is stated as follows:

> *PURPOSE: The purpose of this rule is to establish a proper means of identifying to transiting and terminating carriers all carriers who originate traffic that is transmitted over the LEC-to-LEC network.*

Q. DID THE COMMISSION'S PROPOSED RULE 29.040(4) CONTAIN A REQUIREMENT TO INCLUDE CPN IN THE INTER-COMPANY BILLING RECORD FOR WIRELESS ORIGINATED CALLS?

A. No. As noted above, the language in the "Title" of Rule 29.040 and the "Purpose" of the rule clearly stated that the goal is to identify originating carriers.

Q. IS THERE ANY REFERENCE TO CPN IN RULE 29.040(4) MAKING CPN A REQUIREMENT FOR THE INTER-COMPANY BILLING RECORD FOR WIRELESS ORIGINATED CALLS?

A. No.

Q. HAD THE PROPOSED RULE REQUIRED THE PROVISION OF CPN ON BILLING RECORDS ASSOCIATED WITH WIRELESS-ORIGINATED CALLS, WOULD AT&T MISSOURI HAVE PROVIDED COMMENTS ON THAT PROPOSAL?

A. Yes. AT&T Missouri would have explained that neither it nor any other ILEC provided CPN on the billing records associated with wireless-originated calls. AT&T Missouri would have explained that industry standards did not support such a requirement and that it would be expensive and time consuming to develop the capability, with little or no benefit. The fact that this evidence was not presented is critical -- no party's written comments in the rulemaking indicated an understanding that the rule included such a requirement and the rule did not propose the inclusion of CPN.

Q. DO ANY OF THE SMALL ILEC'S WRITTEN COMMENTS IN THE RULEMAKING INDICATE AN UNDERSTANDING THAT CPN WOULD BE INCLUDED IN THE BILLING RECORD?

A. No. The only reference to a requirement in the rule to provide CPN were in the STCG's supporting comments that pertained to Rule 29.040(1), (2) and (6) -- which are not at

issue here.[1] These sections deal with the transmission of CPN with the call and, with minor exception, were also supported by AT&T Missouri. STCG's only reference to Rule 29.040(4) -- the rule at issue here -- was a supporting comment pointing out that it requires the "use of industry standard Category 11-01-XX records when requested by a terminating carrier," which it observed "will facilitate billing for traffic delivered to the STCG member companies by the former PTCs. . . ."[2] And the MITG's only specific written comment about the content of these records was:

> the ERE rule would substitute a new type of billing record different than the industry standard 1101 record. Whereas the industry standard 1101 identifies the IXC bringing the call to the terminating tandem as the financially responsible carrier, the ERE substitutes modifications to the 1101 which are designed to attempt to identify the originating carrier.[3]

Q. DOES AT&T MISSOURI COMPLY WITH THE RULE BY PROVIDING TERMINATING CARRIERS CATEGORY 11-01-XX RECORDS ON WIRELESS-ORIGINATED CALLS THAT IDENTIFY THE CARRIER FOR INTERCARRIER BILLING PURPOSES?

A. Yes.

Q. HOW DOES AT&T MISSOURI'S CATEGORY 11-01-XX RECORD FOR WIRELESS-ORIGINATED CALLS IDENTIFY THE ORIGINATING CARRIER?

A. The originating wireless carrier is identified by the population of the originating OCN field of the Category 11 record.

[1] STCG Comments on Proposed Enhanced Records Exchange Rule, filed in Case No. TX-2003-0301 on February 2, 2005 at p. 9.
[2] Id., pp. 9-10
[3] Supporting Comments of the MITG, filed in Case No. TX-2003-0301 on February 1, 2005 at p. 10, fn. 5.

Q. WHAT IS AN OCN?

A. An OCN is a four digit code assigned by the National Exchange Carrier Association ("NECA") used in the telephone industry to identify telephone companies. NECA also assigns OCNs to other carriers, such as CLECs and wireless carriers.

Q. HOW ARE OCNs USED?

A. OCNs are used in inter-company billing records to identify the carrier responsible for paying intercarrier compensation charges on telephone calls. For example, when one carrier terminates telecommunications traffic originated by another carrier, the terminating carrier bills the originating carrier for the cost of that termination. To do so, of course, it needs to be able to identify the originating carrier.

Q. HAS THE OCN ALWAYS BEEN USED?

A. No. Historically, the first six digits (NPA-NXX) of a telephone number was enough to identify a company because that company would own all the line numbers (last four digits of a telephone number) that follow the NPA-NXX. The billing company, in this case the terminating company, could simply perform a lookup of the originating NPA-NXX in a table.

Q. DOES THE NPA-NXX STILL PROVIDE ENOUGH INFORMATION TO IDENTIFY THE RESPONSIBLE CARRIER?

A. No. NPA-NXX is no longer enough. The industry has evolved substantially; so much so that today, with Resale, UNE-P (which is being replaced by wholesale commercial

agreements), number portability (wireless and wireline), that all line numbers sharing an NPA-NXX are not customers of the same company. Therefore, it was apparent that other methods of carrier identification for billing purposes were needed and have been developed under industry standards.

Q. HAS THE INDUSTRY DEVELOPED A MEANS OF IDENTIFYING ORIGINATING CARRIERS FOR BILLING PURPOSES?

A. Yes. Through the OBF, the industry has reached consensus on the inclusion of OCN in the Category 11-01-XX EMI record for wireless originating calls and has added fields to the record for this purpose.

Q. IS THIS ALSO CONSISTENT WITH THE COMMISSION'S RULES?

A. Yes. Commission Rule 29.020(5)(A), which is part of the rule's definition for a Category 11-01-XX record states:

> (A) A Missouri-Specific Category 11-01-XX Record is a mechanized individual call detail record for feature group C (FGC) traffic developed by the incumbent local exchange carriers in Missouri for intercompany settlements pursuant to the MoPSC Report and Order in Case No. TO-99-254. This record contains data transferred from a 92-01-XX mechanized call detail record. The first two digits in the record are "11." This type of call record is identical to a category 11-01-XX record except that it contains an originating operating company number (OCN) in positions 167 through 170 instead of a CIC in positions 46 through 49.

Q IN THE COMMISSION'S ORDER OF RULEMAKING ADOPTING 29.040(4), THE COMMISSION STATED: "WE ACKNOWLEDGE THE MITG CLAIMS THAT SBC STRIPS OFF THE CPN OF THE WIRELESS-ORIGINATED CALLS

WHEN IT CREATES CATEGORY 11-01-XX BILLING RECORDS."[4] DOES AT&T MISSOURI (FORMERLY KNOWN AS SBC MISSOURI) "STRIP" CPN FROM THESE CATEGORY 11-01-XX BILLING RECORDS?

A. No. As I explain further below, CPN is not used for billing intercompany compensation to wireless carriers and has never been included in the industry standard Category 11-01-XX EMI billing record for wireless-originated traffic. Mr. Constable also explains in his testimony that industry standards do not call for CPN to be included in the AMA recordings for wireless-originated calls. Since it was never part of the AMA, it is not available to the billing processing systems for the creation of EMI records, such as the Category 11-01-XX records for wireless originating traffic.

Q. IN ITS ORDER OF RULEMAKING ADOPTING 29.040(4), THE COMMISSION STATED THAT THE LACK OF CPN IN AT&T MISSOURI'S CATEGORY 11-01-XX RECORDS FOR WIRELESS-ORIGINATED CALLS "LEAVES TERMINATING CARRIERS WITH LITTLE OR NO MORE INFORMATION THAN WAS PREVIOUSLY CONTAINED IN SBC'S CTUSR." IS THIS CORRECT?

A. No. The Cellular Transiting Usage Summary Report ("CTUSR") was a very high level monthly report AT&T Missouri prepared for each LEC summarizing the total number of calls and minutes, broken down by exchange that each wireless carrier terminated to the LEC's exchanges. For example, a CTUSR for New Florence Telephone Company (a single exchange company) might state that in the reporting month Cingular terminated 10

[4] Order of Rulemaking, Missouri Register Vol. 30, No. 12, issued June 15, 2005 at p. 1388.

calls for 30 minutes, Verizon terminated 15 calls for 45 minutes, and Nextel terminated 20 calls for 60 minutes. The CTUSR contained no information concerning the specific calls, such as date, time, duration or the dialed number. A sample of the CTUSR is attached to my testimony as Read-Schedule 5.

Category 11-01-XX records for wireless-originated calls, on the other hand, are detailed EMI records. The records contain information for each call such as date, time, duration and the dialed number, as well as important identification information such as OCN, Type of Access, Trunk Group, and 30 different Indicators populated as appropriate for various call types. A sample of the Category 11-01-01 record is attached to my testimony as Read-Schedule 6(P).

Q. DOES CPN PROVIDE ENOUGH INFORMATION TO BILL THE ORIGINATING CARRIER?

A. No. While CPN served a purpose in the past for landline-originated calls (e.g., IXC calls, LEC carried local/toll calls), the industry has always recognized it has little or no value for billing purposes for wireless traffic. The commission recognized this deficiency in its Order of Rulemaking when it stated "...due to roaming, the presence of CPN will not always permit determination of the proper jurisdiction of each and every telephone call."[5]

Q. WHY DOES ROAMING MAKE CPN UNRELIABLE FOR USE IN BILLING WIRELESS-ORIGINATED TRAFFIC?

[5] Order of Rulemaking, Mo. Reg. Vol. 30, No. 12 (June 15, 2005) at pp. 1377-1378.

A. Because of roaming, CPN cannot be used to jurisdictionalize a call because it does not provide the geographic location of the wireless subscriber placing a call. For example, when a wireless subscriber with a Kansas City, Missouri wireless number travels to Chicago, Illinois and places a wireless call to a landline customer back in Kansas City, that call would be an interstate-interMTA call, for which interstate, interMTA rates (typically interstate access charges) would apply. But if the CPN (the calling party number) and the called number were used to jurisdictionalize the call, it would be incorrectly billed because the call would appear to be a local call, for which lower intraMTA charges would be charged.

Q. IS CPN USED BY LECs IN THE INDUSTRY FOR INTERCOMPANY BILLING OF WIRELESS-ORIGINATED CALLS?

A. No.

Q. IF LECs CANNOT USE CPN, HOW DO THEY DETERMINE THE CORRECT JURISDICTIONAL RATE TO APPLY TO WIRELESS-ORIGINATED CALLS THEY TERMINATE?

A. LECs use "factors" (i.e., percentages) that are usually agreed-upon between a LEC and a wireless carrier and are contained in interconnection agreements. These factors represent the parties' estimation of the amount of traffic exchanged between them that is intraMTA, intrastate-interMTA, and interstate-interMTA. If the parties cannot agree on factors, the parties can ask the state commission to set the factors in an arbitration under the federal Telecommunications Act.

Q. ARE THERE OTHER PROBLEMS WITH USING CPN IN BILLING FOR WIRELESS-ORIGINATED CALLS?

A. Yes. Wireless number portability also causes CPN to be unreliable. Now, customers changing their wireless company can take their old wireless telephone number with them to their new wireless provider (which is called "porting").

Q. WHAT IMPACT DOES PORTING HAVE?

A. Porting precludes the use of CPN for identifying carriers. For example, a wireless subscriber's telephone number may have originally been assigned to U.S. Cellular. But if the subscriber changes to Verizon service and ports his or her old U.S. Cellular number to Verizon, use of CPN for intercompany billing purposes would result in the erroneous billing of U.S. Cellular.

IV. INDUSTRY STANDARDS DO NOT SUPPORT RULE 29.040(4) REQUIRING CPN TO BE INCLUDED AS PART OF THE CATEGORY 11-01-XX RECORDS FOR WIRELESS-ORIGINATED CALLS

Q. IN ITS ORDER OF RULEMAKING ADOPTING 29.040(4), THE COMMISSION STATED THAT THE LACK OF CPN IN AT&T MISSOURI'S CATEGORY 11-01-XX RECORDS FOR WIRELESS-ORIGINATED CALLS LEAVES IT "NON-INDUSTRY STANDARD." IS THIS CORRECT?

A. No. CPN has never been a standard field in the Category 11-01-XX record for wireless-originated calls. Therefore, the lack of it can not make the record non-industry standard. As I explain below, industry standards call for such records to include the responsible wireless carrier's Operating Company Number ("OCN"), which informs the terminating

carrier of the appropriate wireless carrier to bill. AT&T Missouri's Category 11-01-XX record contains the OCN and complies with this requirement to identify the carrier.

Q. DOES AT&T MISSOURI'S CATEGORY 11-01-XX RECORDS FOR WIRELESS-ORIGINATED CALLS COMPLY WITH INDUSTRY STANDARDS?

A. Yes. At AT&T Missouri, we have designed our Category 11-01-XX record for wireless calls based on the EMI standard developed and maintained by the Ordering and Billing Forum ("OBF") of the Alliance for Telecommunications Solutions ("ATIS").

Q. IS THIS CONSISTENT WITH THE MISSOURI COMMISSION RULES?

A. Yes. Commission Rule 29.020(5), which is part of the definition section, states: "A Category 11-01-XX Record is a mechanized individual call detail record developed in compliance with the Ordering and Billing Forum (OBF) exchange message interface (EMI) industry guidelines. . . ."

Q. WHAT IS ATIS?

A. Originally called the Exchange Carriers Standards Association, ATIS describes its industry standard-setting role as follows on its website:

> ATIS is a United States based body that is committed to rapidly developing and promoting technical and operations standards for the communications and related information technologies industry worldwide using a pragmatic, flexible and open approach.
>
> ATIS prioritizes the industry's most pressing, technical and operational issues, and creates interoperable, implementable, end to end solutions -- standards when the industry needs them and where they need them.

> Over 1,100 industry professionals from more than 350 communications companies actively participate in ATIS' 22 industry committees and incubator solutions programs. ATIS develops standards and solutions addressing a wide range of industry issues in a manner that allocates and coordinates industry resources and produces the greatest return for communications companies.
>
> ATIS creates solutions that support the rollout of new products and services into the communications marketplace. Its standardization activities for wireless and wireline networks include interconnection standards, number portability, improved data transmission, Internet telephony, toll-free access, telecom fraud, and order and billing issues, among others. ATIS is accredited by the American National Standards Institute (ANSI).

Q. WHAT IS THE OBF?

A. The ATIS-sponsored Ordering and Billing Forum (OBF) provides a forum for customers and providers in the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters.

Q. WHAT ARE EMI RECORDS?

A. EMI records are part of the ATIS OBF EMI document. The EMI as described on the ATIS OBF website is:

> The Exchange Message Interface (EMI) document is a message exchange guideline for the telecommunications industry. It is used as a standard method of interface between companies providing various services in the industry. The EMI is used to support customer billing and various customer and company support functions needed by the industry (e.g. account summary and tracking analysis).

Q. HOW ARE EMI RECORDS CREATED?

A. At AT&T Missouri, EMI records are created utilizing the network recordings made in AMA format as the primary source. Some fields are populated or derived from tables within the application billing system. The following is a simple depiction of the process. The Category 11 record is an example of a EMI record.

AMA Recordings→ Message Processing System→ Call Detail Records (EMI format)

Q. CAN THE AT&T MISSOURI BILLING SYSTEM POPULATE THE CATEGORY 11-01-XX RECORD WITH WIRELESS CPN UTILIZING THE AMA RECORDS FROM THE SWITCH OR TABLES IN THE AT&T MISSOURI BILLING SYSTEM?

A. No. As AT&T network witness Jason Constable explains, AT&T Missouri's current Lucent switches do not have the technical capability to record the CPN for wireless originated traffic, and its Nortel switches are not configured to do so. As I explained, the CPN is not used for billing purposes, and has never been part of the AMA recording for this type of traffic in AT&T Missouri. Therefore, as far as the downstream billing system is concerned, the information does not exist as an input to the process of creating the EMI record. Thus, that information is not available to populate on Category 11 records.

Q. WHAT OBF STANDARD DID AT&T MISSOURI FOLLOW IN DEVELOPING ITS CATEGORY 11-01-XX RECORD FOR WIRELESS-ORIGINATED CALLS?

A. In compliance with OBF standard Category 11-01-01 record description on page 3-296 of the EMI document, AT&T Missouri developed Category 11-01-XX records to identify

originating wireless calls. A copy of this record description is attached to my testimony as Read-Schedule 7(P).

Q. DID THE OBF CONDUCT INDUSTRY DISCUSSIONS TO ADDRESS WHAT INFORMATION WAS NEEDED IN ORDER TO BILL INTERCOMPANY COMPENSATION ON WIRELESS-ORIGINATED TRAFFIC?

A. Yes. Very extensive discussions were held at OBF and documented in issues 2308 which was titled: "Need for Accurate Jurisdictional Information for Accurate Billing" and issue 2349 which was titled: "Impact of Wireless Number Portability on Wireline Service Providers." These issues were discussed and documented for over three years by a cross section of wireless providers, Incumbent LECs (including Regional Bell Operating Companies or "RBOCs" and Independent LECs), CLECs and vendors. The overwhelming theme of the discussions held by these groups was *"identification of wireless traffic."* Copies of the documentation notes from OBF Issues 2308 and 2349 are attached to my testimony as Read-Schedules 8(P) and 9(P).

Q. DOES THE DOCUMENTATION ON THESE ISSUES REFLECT ANY NEED TO INCLUDE CPN IN THE CATEGORY 11-01-XX RECORD FOR WIRELESS-ORIGINATED CALLS?

A. No. At no place in the OBF documentation is it even suggested that wireless originating CPN is needed for wireless identification. Instead, the documentation reflects industry consensus that the OCN should be provided. In fact in issue 2349 on page 27 of the notes, a question was asked of the industry, "Will the EMI record reflect the correct

identification (OCN) of the Wireless Provider…?" The responses from BellSouth, SBC, Sprint, and Verizon stated, "Yes,…will continue to provide these records." It is clear to the industry that CPN for wireless originating calls provides no benefit and that the "correct identification" is the use of OCN.

Q. WHEN IS CPN A RELIABLE SOURCE FOR DETERMINATION OF PROPER JURISDICTION OF WIRELESS ORIGINATING TRAFFIC?

A. Since there is no way to tell from billing records when a cell phone is roaming, the answer must be never.

Q. IS CPN AN INDUSTRY RECOGINIZED SOURCE OF INFORMATION FOR ORIGINATING WIRELESS CARRIER IDENTIFICATION?

A. No.

Q. WHAT HAS THE INDUSTRY DONE IN THE AREA OF WIRELESS IDENTIFICATION TO ASSIST BILLING COMPANIES?

A. The Record Description page for a Category 11-01-01 record in the EMI document states:

> To identify Cellular/Wireless originating and terminating traffic, the Type of Access Service (position 78-79) and Indicator 9 or 10 (position 90 & 91) should be populated.

This information will positively identify the record as a wireless originating or terminating record. Also populated is the Operating Company Number ("OCN") for

originating calls (position 167-170) and this will positively identify the originating wireless carrier.

Q. DOES THE OBF EMI DOCUMENT PRESCRIBE DIFFERENT STANDARDS FOR DIFFERENT TYPES OF CALLS (e.g., WIRELINE CALLS AS OPPOSED TO WIRELESS-ORIGINATED CALLS)?

A. Yes.

Q. WHY ARE THE STANDARDS DIFFERENT?

A. Different information is needed to bill different types of calls. In Wireline billing, geographic location is critical for distance billing. In Wireless billing, geographic location cannot be obtained due to the mobile nature of the wireless end of the call and is therefore not used in billing.

Q. DOES AT&T PROVIDE A CATEGORY 11 RECORD FOR WIRELESS ORIGINATING TRAFFIC POPULATED AS DISCUSSED ABOVE, IN ANY OF ITS OTHER TWELVE STATES IN WHICH IT PROVIDES SERVICE AS A LOCAL EXCHANGE COMPANY?

A. Yes. AT&T provides the same type of record in all five states in its Southwest Region and is currently in the process of making software changes to implement them in its Midwest Region later this year. Consistent with requests from carriers across the industry, our goal is to bring consistency across our regions. I would note that CPN is

not provided in the billing records associated with wireless-originated traffic in any of the AT&T states.

Q. DO ANY OTHER LOCAL EXCHANGE COMPANIES IN THE COUNTRY USE THIS SAME RECORD?

A. Yes, as noted above through the notes of OBF issue 2349, BellSouth, Verizon, and Sprint also provide this information in this manner.

Q. DO ANY OTHER LOCAL EXCHANGE COMPANIES IN MISSOURI USE THIS TYPE OF RECORD?

A. Yes. I understand from recent workshops in Missouri that Sprint Missouri (which soon will be known as Embarq) and CenturyTel also currently follow this process.

Q. DOES THE CATEGORY 11-01-XX RECORD AT&T MISSOURI PROVIDES ON WIRELESS-ORIGINATED CALLS COMPLY WITH THE INTENT OF COMMISSION RULE 29.040?

A. Yes. The overall intent of Commission Rule 29.040 is clear from the title of the rule and its purpose statement, which is to identify the originating carrier. Our Category 11-01-XX record for wireless-originated calls does that and is fully compliant with the rule.

Q. IS CPN A REQUIRED FIELD IN THE INDUSTRY STANDARD EMI CATEGORY 11-01-XX RECORD?

A. No.

Q. IS THERE AN ESTABLISHED ACCEPTED INDUSTRY PRACTICE FOR THE USE OF CPN IN STANDARD EMI CATEGORY 11-01-XX RECORDS FOR WIRELESS ORIGINATED TRAFFIC?

A. No.

Q. WHAT INFORMATION DOES AT&T MISSOURI PROVIDE IN CATEGORY 11-01-XX RECORDS PASSED TO THE ILECS OF MISSOURI TO ASSIST IN THE BILLING OF WIRELESS ORIGINATING TRAFFIC?

A. AT&T Missouri does not use CPN to bill wireless carriers for the calls originated by these carriers. The records passed to the terminating LECs will contain the same information used in AT&T Missouri's billing system for billing wireless originating traffic. As noted in Accessible Letter ILEC 04-014 SW, dated November 29, 2004, the originating wireless OCN, Type of Access and Indicator 9 will be populated, thus remaining in industry compliance. In addition the trunk group number will be populated in position 41-44 as well as the Billing Telephone Number ("BTN") of the purchaser of the trunk group.

Q. IS THIS THE ESTABLISHED ACCEPTED INDUSTRY PRACTICE FOR INFORMATION EXCHANGED VIA EMI CATEGORY 11-01-XX RECORDS FOR WIRELESS ORIGINATED TRAFFIC?

A. Yes. This is the established industry practice, not only used by AT&T Missouri, but other companies such as BellSouth and Verizon.

Q. DOES AT&T MISSOURI OPPOSE A FINDING BY THE COMMISSION THAT RULE 29.040(4) REQUIRES TANDEM CARRIERS TO PROVIDE CPN IN CATEGORY 11 BILLING RECORDS ON WIRELESS ORIGINATED TRAFFIC?

A. Yes. AT&T Missouri strongly opposes such a requirement.

Q. WHAT IS THE BASIS FOR AT&T MISSOURI'S OPPOSITION?

A. Aside from the fact that Rule 29.040(4) never contained this requirement in the first place, AT&T Missouri opposes such a finding because: it is contrary to industry standards; it is beyond the technical capability of AT&T Missouri's network; would require AT&T Missouri to pay Lucent Technologies $1 million or more to develop that technical capability for AT&T Missouri's Lucent switches, and would require very substantial and burdensome changes to AT&T Missouri's internal information processing systems used to generate intercompany billing records; and would produce little, if any, benefit to AT&T Missouri or any other carriers.

Q. WHY WOULD REQUIRING CPN IN CATEGORY 11-01-XX BILLING RECORDS FOR WIRELESS-ORIGINATED CALLS BE INCONSISTENT WITH INDUSTRY STANDARDS?

A. As AT&T Missouri witness Jason Constable stated, there are two industry standards that apply here, and such a requirement would be inconsistent with both of them. The first standard comes from the Ordering and Billing Forum ("OBF") and pertains to the content of Exchange Message Interface ("EMI") intercompany billing records. As I explained

above, this standard does not require CPN to be included in the Category 11-01-XX billing record for wireless-originated calls. The other standard comes from Telcordia Technologies and defines the content of AMA records that are created by telephone company switches. As Mr. Constable explains in his testimony, this standard also does not require the inclusion of CPN in AMA records for wireless-originated calls.

Q. DOES AT&T MISSOURI HAVE THE TECHNICAL CAPABILITY TO INCLUDE CPN IN THE CATEGORY 11-01-XX RECORDS ITS PROVIDES TO OTHER CARRIERS ON WIRELESS-ORIGINATED CALLS THAT TRANSIT ITS NETWORK?

A. No. As AT&T Missouri witness Jason Constable explained, AT&T Missouri's Lucent 5ESS tandem switches were designed in accordance with industry standards to not capture and populate CPN in wireless originated AMA records. In addition, AT&T Missouri does not have processing in place that is capable of creating an EMI Category 11-01-XX billing record on wireless-originated calls even if its switches could capture and generate such AMA recordings on these types of calls.

Q. WHAT CHANGES WOULD AT&T MISSOURI NEED TO MAKE TO ITS INTERNAL DATA PROCESSING SYSTEMS TO ENABLE IT TO INCLUDE CPN IN EMI CATEGORY 11-01-XX RECORDS FOR WIRELESS-ORIGINATED CALLS?

A. To include CPN for wireless originated calls, AT&T Missouri would have to change to its Usage Processing System ("UPS") as well as its Carrier Access Billing System. In

UPS we would first have to identify the calls as terminating to an ILEC in Missouri, so they could be segregated for special handling. The Missouri-only ILEC terminating records would then be populated according to commission order.

Q. WHY WOULD AT&T MISSOURI "SEGREGATE[D] FOR SPECIAL HANDLING"?

A. AT&T Missouri is responsible in Missouri and all other states to provide accurate, industry standard records to our trading partners, including Competitive Local Exchange Carriers ("CLECs").

Q. WHY WOULD AT&T MISSOURI NOT PROVIDE CLECS CPN FOR WIRELESS ORIGINATED CALLS?

A. For AT&T Missouri to provide industry standard records in a consistent manner in all states, would require the CLECs to change their processes.

Q. DO YOU BELIEVE CLECs WOULD WANT CPN IN THESE TYPES OF CALLS?

A. No. Many CLECs, as well as ILECs, have participated in the OBF discussions regarding identification of wireless originating traffic. As not one has suggested CPN is part of the solution, it is clear they realize there is no benefit from making such a change. In addition, any change AT&T Missouri made to change BTN to CPN would force costs on the CLEC and would likely lead to disputes.

Q. WHAT DO YOU ESTIMATE THE COST TO AT&T MISSOURI OF CHANGING ITS INTERNAL DATA PROCESSING AND BILLING SYSTEMS TO PROVIDE CPN IN WIRELESS CATEGORY 11-01-XX RECORDS TO BE?

A. Mr. Constable discusses the cost of the network upgrades needed to provide CPN in Missouri AMA records. Once that is done, the cost to change the billing system would likely be over $100,000 in internal personnel costs. The greater cost, that is difficult to measure, is the cost of IT maintaining unique coding for Missouri to handle the segregated process. This will require additional testing in every subsequent programming release. There is also the concern, since UPS handles all usage, not just ILEC records, that a special handling process puts all records at risk.

Q. HOW LONG WOULD SUCH AN EFFORT TAKE?

A. The IT work will require a project implementation. AT&T Missouri has a very intense Software Development Life Cycle ("SDLC"), to ensure billing accuracy. Projects are scheduled based on priority and efficiencies. After they are scheduled the SDLC process takes about eight months.

Q. WHY DOES THE BILLING PROCESS TAKE SO LONG?

A. This is best explained by understanding the AT&T Missouri SDLC. The process, described in detail below, must be followed to ensure that these changes are very structured, which is necessary to ensure the integrity of these critical systems. This process is very labor intensive due to the many work groups that must work interdependently throughout the process.

Q. HOW DOES THIS WORK GET STARTED?

A. When the Commission issues its Order, a copy of the Order will be provided to the Wholesale Marketing organization who has the responsibility of determining which organizations within AT&T Missouri will be impacted by the changes that are contained in the mandate[6]. When the Wholesale Marketing organization determines that a mandate will impact AT&T's billing system, it contacts the Information Technology ("IT") organization for placement of the mandate on IT's Retail Major Billing Release Calendar. When the estimated hours associated with a mandate are less than 5,000 (as in this case), AT&T's standard Services' Software Development Lifecycle ("SDLC") process is utilized. This process generally takes about 8 months to complete and results in six Retail Major Billing Releases per year. The SDLC process involves four phases: (1) Consultation and Assessment (C&A), (2) Definition and Funding (D&F), (3) Developing and Testing (D&T), and (4) Deployment. Each phase contains multiple steps or milestones. Some of the most significant milestones within this process includes the following components:

(1) The Work Request;

> The Work Request as part of the C&A phase is a document stating a need for potential changes to be made by the IT department. The purpose of the C&A phase is to consult with and clarify the needs of the client, provide an initial IT impact assessment, and determine if the initiative has the necessary priority and resources to proceed to the next phase. During this step a project manager will be assigned to assist the client in gathering all necessary work groups to discuss the potential change. The initial meeting

[6] The mandate approval process is an effort to more closely manage which projects are given mandate status. This review process ensures that all projects submitted to IT as mandated projects are, in fact, mandated by a regulatory or legislative action. By adding a review process that ensures that a mandate is truly a regulatory or legislative requirement and that the scope of the project aligns with the specific provisions contained in the mandate, AT&T has been able to use its IT resources more effectively in responding to qualified mandates.

will have the client explaining what they want done. This meeting will also help identify additional work areas that need to be involved. Work areas take action items to assess their impacts. Additional meetings must be held to coordinate all the groups and help create a High Level Estimate of work. This will also help in getting a first guess at the complexity of the potential project. While these meetings are taking place, other meetings are being conducted to determine if the project is a mandate. Even though the Work Request process is time consuming, each section is critical to ensuring that the outcome of the project is exactly as the client desires.

(2) Resource Commitment for Design and Funding;

This step, as part of the C&A phase, is to ensure that resources from the impacted IT work groups are available to assist with the design of the project. Funding for the work must be determined, but does not cause a delay once the project is deemed mandated. The impacted work groups that have been identified thus far for this project are UPS, Reference Tables, BSD- Common Rating and CABS. These groups are some of the core billing applications that are involved with the creation and maintenance of all customer billing and detailed usage exchange. Therefore the impact is a risk to millions of Missouri customer bills and the associated usage. Billions of usage records each month flow through these impacted systems.

(3) Baselined Business Requirements;

In this step of the D&F phase, a document is coordinated with all identified areas of the business to ensure that the needs of the requesting client do not negatively impact other areas of the business. If impacts exists, plans must be made to either change the other areas of business or notify customers of impending, non-negotiable change. For example, analysis must be done to determine if Competitive Local Exchange Companies (CLECs) will be impacted by this requested change. If so, what are the appropriate steps necessary to notify CLECs and possibly the industry of the upcoming change. This step will include the Client, technical requirements people, Methods and Procedure groups, Electronic Data Storage representatives, as well as other identified groups. The goal is to create a document that works for the entire business without losing site of what the client is requesting. Multiple meetings with be coordinated by the project manager so that each area of the business understands and has an opportunity to analyze impacts to their organization and/or products.

(4) Baselined Technical Requirements;

To complete this milestone, a document is created that defines the technical functionality that must exist to satisfy the Business Requirements. It describes what the software must do and its operational constraints. The Technical Requirements will be created through multiple meetings with experts from each of the application groups (as defined above in the C&A phase). Just as in the Business Requirements, each of the predetermined impacted areas will need to complete their section of this document. When completed this document will further explain what the client has requested, but this time in technical terms that can be understood by developers.

(5) Baselined High Level Design;

This step (HLD) identifies and describes the new, modified, and/or deleted components needed to support the business requirements for a functional area. This document will identify each impacted functional area and describe impacts to data models, functionality changes, and/or file layouts that affect multiple system applications. HLD can be system design, application design or both. Research will be required as if both are needed. Questions will be answered such as, Is a new system needed to handle the increased volume of work or can the existing systems handle the additional work? Will a new application be needed to handle the new or changed product/service or can the existing application be modified to accommodate the change? Dedicated Systems and Application Leads will coordinate with all the applications identified previously. They will work with the client, project manager, and Technical Requirements documents to create a design document. This document will be a pictorial view or road map of necessary changes to be followed by the developers. This will involve multiple meetings with committed personnel from previous steps as well as informal communication with developers.

(6) Project Release Commitment;

In this step all definition documents are reviewed to ensure there is no contradiction with other projects in the targeted release.

(7) Baselined Detail Design;

This step in the D&T phase begins by determining which components will require a Detailed Design by referring to the Baselined HLD document. Designers will identify any opportunity to reuse existing coding therefore saving development time and resources. Also, the designers will review the HLD and further decompose each of the key components into modules

and sub-processes. The resultant document will demonstrate the processing logic, data structures, data definitions, modules and sub-processes created in enough detail for a programmer to develop the code. The Designer(s) will take the HLD created previously and create a step by step process (design) so that each application developer is working to the same goal, even though they work independently.

(8) Software Products Approved for System Test;

In this step the software is changed and/or created, including appropriate reuse of existing code. Once the coding and/or new systems and applications are complete, they are approved for testing. Most software is developed in modules, units of code. Developers must continually coordinate to ensure compliance with the Detailed Design. This step handled by the programmers (developers) from all development groups working with Design Leads.

(9) System Test Complete;

System testing consist of many steps and frequently results in necessary code modifications created in the previous step. After a test plan is developed, testing begins with a Unit Test. This is testing the new code within the containing module. Integration Testing is often next and this includes the identified impacted modules within the application leg. Success brings the next series of tests including System Tests, Performance Tests, and End-to-End Tests. These are tests to ensure no negative impacts to the system, CPU efficiency, or other products or services. Tests are also conducted to verify/validate impacts or no impacts to External/CLEC customers.

(10) Software Deployed.

After all testing is complete, the new code is prepared for production release. This include coordination between the software developers and the regional data centers. The new code is installed and validated.

V. SUMMARY

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Neither the text nor the purpose of Commission rule 29.040(4) requires tandem carriers to include CPN in the Category 11-01-XX records for wireless-originated calls. Rule

29.040's stated purpose is to identify carriers that originate traffic transmitted over the LEC-to-LEC network so that terminating carriers know which carrier to bill. AT&T Missouri's wireless Category 11-01-XX records, in compliance with the rule and industry standards as set out in the OBF EMI guidelines, identifies such carriers by providing the OCN. The provision of this and other information contained in AT&T Missouri's record gives terminating carriers all the information they need to render accurate bills for intercompany compensation to wireless carriers. CPN does not identify the originating carrier on wireless-originated calls and cannot be used for billing intercompany compensation on wireless-originated calls because of its inherent unreliability.

Adding a CPN requirement to Rule 29.040(4) would (1) require AT&T Missouri to pay Lucent Technologies $1 million or more to develop that technical capability for AT&T Missouri's Lucent switches, (2) require very substantial and burdensome changes to AT&T Missouri's internal information processing systems used to generate intercompany billing records; and (3) produce little, if any, benefit to AT&T Missouri or to the carriers that use AT&T Missouri's Category 11-01-XX for intercompany billing purposes.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

SUMMARY OF EDUCATION AND WORK EXPERIENCE

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I received my Bachelor of Business Administration in Personnel Management from East Texas State University in 1981.

Q. PLEASE OUTLINE YOUR WORK EXPERIENCE.

A. I began employment with AT&T in 1981 in Information Services. My responsibilities included data center operations cycle processing for Payroll, Toll, Customer Records Information System ("CRIS"), Customer Access Billing System ("CABS") and related online systems. I spent three years in systems development at Corporate Headquarters. I then worked for four years in Mid-Range Computer operations with duties which included toll data collection. Since 1997, I have been a part of the IT Billing Project Management support team. My responsibilities include support for all of AT&T Illinois with respect to Industry Markets Product and Account Management, primarily in the area of Daily Usage File ("DUF"). I also serve as an AT&T representative to OBF and currently hold the title of Co-Chair of the OBF Strategic Advisory Group.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS?

A. Yes. I testified in May 2005 before the Missouri Public Service Commission in Case No. TO-2005-0336, which was the consolidated arbitration between AT&T Missouri (doing business then as SBC Missouri) and numerous CLECs for a replacement interconnection agreement for the Missouri 271 Agreement ("M2A").

I have testified before the Illinois Commerce Commission in conjunction with interconnection arbitrations with MCI and AT&T as well as the Public Utility Commission of Texas ("Texas PUC") in Docket No. 28209 and Docket No. 30368 in cases with Premiere and CyTel regarding disputed bills and message exchange.

I have testified in interconnection arbitrations with Level 3 in Illinois, Wisconsin, Kansas, California, and Arkansas, in addition to filing written testimony for Level 3 arbitration hearings in Connecticut, Michigan, and Indiana. I have also testified in interconnection arbitrations with multiple CLECs in Kansas (K2A), Oklahoma (O2A), Texas (T2A), and Arkansas (A2A).

Industry Markets

SBC - Southwest
1616 Guadalupe
Room 640
Austin, TX 78701

March 18, 2004

Emailed

ARKANSAS, KANSAS, MISSOURI, OKLAHOMA, TEXAS ILECs

Subject: Availability of Wireless to Landline Mechanized Detail Call Records to Terminating LEC(s)

Southwestern Bell Telephone, L.P. d/b/a SBC Arkansas, SBC Kansas, SBC Missouri, SBC Oklahoma and SBC Texas, collectively referred to as SBC Southwest Region 5-State, will begin providing EMI Category 11-01-XX mechanized detail call records for certain wireless originated traffic to the terminating Local Exchange Carriers ("Terminating LECs") beginning in June 2004. These wireless to landline mechanized detail call records can be used by the terminating LECs to identify certain wireless traffic that transited SBC Southwest Region 5-State's network and terminated into their exchanges.

The format for these records will be the standard ATIS/OBF EMI Category 11-01-XX mechanized detail call record. As currently specified, these records will contain a Carrier Identification Code of "0000" in positions 46-49 and the Originating OCN of the wireless company in positions 167-170. These mechanized detail call records will be included within the normal data packs with the other EMI Category 11 detail call records that are currently being sent to the Terminating LECs or their specified vendor. Please provide a copy of this letter to your data processing group or vendor so that they will be able to properly process these records when they begin arriving in June 2004.

The Terminating LECs are responsible for the appropriate processing of these records. Among other things, these mechanized detail call records will enable the Terminating LECs to identify the wireless companies that sent calls into their exchanges and the minutes of use for these calls.

It is important to note that SBC Southwest Region 5-State is replacing the previously provided Cellular Transiting Usage Summary Report (CTUSR) paper reports with the mechanized detail call records discussed above and, as such, the paper reports will no longer be provided.

In accordance with the normal CABS data processing procedures, these mechanized detail call records will only be retained for approximately 90 days and thereafter will not be available for retrieval.

It is SBC Southwest Region 5-State's intent to continue facilitating the identification of the traffic using the LEC to LEC network whenever possible. SBC Southwest Region 5-State is not responsible for any compensation payments for the traffic originated by another company.

SBC Southwest Region 5-State reserves the right to make any modifications to the information set forth above prior to the proposed effective date. Should any modifications be made to the information set forth herein, those modifications will be reflected in a subsequent accessible letter. Should the information be canceled, SBC Southwest Region 5-State will send additional notification at the time of cancellation. SBC Southwest Region5-State will incur no liability to the Terminating LECs if such information, mentioned above, is canceled by SBC Southwest Region 5-State.

Should you have any questions regarding this issue, please contact your Account Manager.

Sincerely,

Account Manager

Industry Markets

SBC - Southwest
1616 Guadalupe
Room 640
Austin, TX 78701

April 22, 2004

Emailed

ARKANSAS, KANSAS, MISSOURI, OKLAHOMA, TEXAS ILECs

Reminder: Availability of Wireless to Landline Mechanized Detail Call Records to Terminating LEC(s)

A letter was sent out March 18, 2004 via email advising that Southwestern Bell Telephone, L.P. d/b/a SBC Arkansas, SBC Kansas, SBC Missouri, SBC Oklahoma and SBC Texas, collectively referred to as SBC Southwest Region 5-State, would begin providing EMI Category 11-01-XX mechanized detail call records for certain wireless originated traffic to the terminating Local Exchange Carriers ("Terminating LECs") beginning in June 2004.

The format for these records will be the standard ATIS/OBF EMI Category 11-01-XX mechanized detail call record that was implemented on IXC traffic beginning August 2002. For Wireless Carrier usage, these records will contain a Carrier Identification Code of "0000" in positions 46-49 and the Originating OCN of the wireless company in positions 167-170. These mechanized detail call records will be included within the normal data packs with the other EMI Category 11 detail call records that are currently being sent to the Terminating LECs or their specified vendor. See attachment for more details.

It is important to note that SBC Southwest Region 5-State is replacing the previously provided Cellular Transiting Usage Summary Report (CTUSR) paper reports with the mechanized detail call records discussed above and, as such, the paper reports will no longer be provided effective September 2004. Mechanized detail call records will be available dependent upon your processing procedures beginning June 15, 2004 on a daily feed and July 2004 for monthly feed. The final CTUSR paper report will be in August 2004 containing June 6th through July 4th 2004 usage records. Due to the CTUSR and the EMI Category 11 detail call records having different billing usage periods and a time lapse of two months in receiving the usage, it would not be beneficial to continue providing the CTUSR paper reports after the August IBIS statement.

In accordance with normal CABS data processing procedures, these mechanized detail call records will only be retained for approximately 90 days and thereafter will not be available for retrieval.

It is SBC Southwest Region 5-State's intent to continue facilitating the identification of the traffic using the LEC to LEC network whenever possible. SBC Southwest Region 5-State is not responsible for any compensation payments for the traffic originated by another company.

SBC Southwest Region 5-State reserves the right to make any modifications to the information set forth above prior to the proposed effective date. Should any modifications be made to the information set forth herein, those modifications will be reflected in a subsequent accessible letter. Should the information be canceled, SBC Southwest Region 5-State will send additional notification at the time of cancellation. SBC Southwest Region 5-State will incur no liability to the Terminating LECs if such information, mentioned above, is canceled by SBC Southwest Region 5-State.

Should you have any questions regarding this issue, please contact your Account Manager.

Sincerely,

Account Manager

ATIS/OBF EMI Document
Wireless to Landline Traffic
Category 11-01-01 Mechanized Detail Call Record

Position 46-49 is the "Carrier Identification" field.
This four position field will be populated with "0000" which indicates that no interexchange carrier (IXC) is to be billed for this call.

Position 91 is "Indicator 10".
This one position field will be populated with "8" which indicates the call is cellular terminated.

Position 146 is the "BSA/Feature Group ID Code" field.
This one position field will be populated with a blank " " which indicates that the Carrier Identification Code is equal to "0000".

Position 167-170 is the "Originating OCN" field.
This four position field will be populated with the state specific Originating OCN of the wireless carrier that sent the call into the LEC to LEC network.

Accessible

Date:	**November 29, 2004**	Number:	**ILEC 04-014 (SW)**
Effective Date:	**February 2005**	Category:	**ILEC**
Subject:	**Wireless to Landline Category 11-01-XX Mechanized Detail Call Record Enhancements**		
Related Letters:	**March 18, 2004 & April 22, 2004**	Attachment:	**No**
States Impacted:	**Arkansas, Kansas, Missouri, Oklahoma, Texas**		
Response Deadline:	N/A	Contact:	Account Manager
Conference Call/Meeting:	**N/A**		

Southwestern Bell Telephone, L.P. d/b/a SBC Arkansas, SBC Kansas, SBC Missouri, SBC Oklahoma and SBC Texas, collectively referred to as SBC Southwest Region 5-State, is enhancing the existing EMI Category 11-01-XX mechanized detail call records for certain wireless originated traffic effective in February 2005. These wireless to landline mechanized detail call records can be used by the terminating LECs to identify certain wireless traffic that transited SBC Southwest Region 5-State's network and terminated into their exchanges.

The existing industry standard ATIS/OBF EMI Category 11-01-XX mechanized detail call records are being enhanced to include additional information. These records will now contain: a "Type of Access Service" in positions 78-79 ("02" for Type 1 Cellular or "03" for Type 2A Cellular or "19" for Type 2B Cellular), Indicator 9 in position 90 will be set to "8", Indicator 10 in position 91 will be set to "0", and Indicator 29 in position 121 will be set to "5".

In addition to the enhancements discussed above, your company may begin receiving Category 11-01-XX mechanized detail call records for traffic coming from certain paging companies that do not have Originating OCNs. Since these paging companies do not have Originating OCNs, the originating OCN field in positions 167-170 of the Category 11-01-XX mechanized detail call records will contain the originating paging company's three character ACNA code followed by a "9". The ACNA code can be used by the terminating LECs to identify certain paging traffic that transited SBC Southwest Region 5-State's network and terminated into their exchanges.

These mechanized detail call records will continue to be included within the normal data packs with the other EMI Category 11 detail call records that are currently being sent to the Terminating LECs or their specified vendor. In accordance with normal CABS data processing procedures, these mechanized detail call records will only be retained for approximately 90 days and thereafter will not be available for retrieval. Please provide a copy of this letter to your data processing group or vendor so that they will be able to properly process these records when they begin arriving in February 2005.

The Terminating LECs are responsible for the appropriate processing of these records. Among other things, these mechanized detail call records will enable the Terminating LECs to identify the wireless companies that sent calls into their exchanges and the minutes of use for these calls.

It is SBC Southwest Region 5-State's intent to continue facilitating the identification of the traffic using the LEC to LEC network whenever possible. SBC Southwest Region 5-State is not responsible for any compensation payments for the traffic originated by another company.

SBC Southwest Region 5-State reserves the right to make any modifications to the information set forth above prior to the proposed effective date. Should any modifications be made to the information set forth herein, those modifications will be reflected in a subsequent accessible letter. Should the information be canceled, SBC Southwest Region 5-State will send additional notification at the time of cancellation. SBC Southwest Region 5-State will incur no liability to the Terminating LECs if such information, mentioned above, is canceled by SBC Southwest Region 5-State.

Should you have any questions regarding this issue, please contact your SBC Account Manager.

REPORT - AP254 - 001
REF - RCC REV DIST. PLAN
SWBT DP CTR - ST LOUIS PROD

SWBT CELLULAR TRANSITING REPORT
CELLULAR USAGE PASSED TO SWBT BY WSPS
BILLING PERIOD: 07/05/97 - 08/04/97
TERMINATING TO 1860-ALMA TEL. CO.

RUN DATE: 10/08/97
RETENTION: 1 YEAR

CARRIER	TERMINATING EXCHANGE		TERMINATING MINUTES
AMERICAN PORTABLE TELECOM	816674	ALMA	[illegible]
		TOTAL	[illegible]
AMERITECH CELLULAR	816674	ALMA	[illegible]
		TOTAL	[illegible]
CMT PARTNERS DBA CELLULAR ONE	816674	ALMA	[illegible]
		TOTAL	[illegible]
NORTHERN ILLINOIS CELLULAR COMM.	816674	ALMA	[illegible]
		TOTAL	[illegible]
SOUTHWESTERN BELL MOBILE SYS., INC.	816674	ALMA	[illegible]
		TOTAL	[illegible]
		COMPANY TOTAL	[illegible]

Read-Schedule 5

SCHEDULE 6 IS

PROPRIETARY IN ITS ENTIRETY

SCHEDULE 7 IS

PROPRIETARY IN ITS ENTIRETY

SCHEDULE 8 IS

PROPRIETARY IN ITS ENTIRETY

SCHEDULE 9 IS

PROPRIETARY IN ITS ENTIRETY