

Exhibit No.:
Issue: Telephone Specific
Witness: William L. Voight
Sponsoring Party: MO PSC Staff
Type of Exhibit: Direct Testimony
Case No.: TE-2006-0053
Date Testimony Prepared: March 24, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

DIRECT TESTIMONY

OF

WILLIAM L. VOIGHT

AT&T MISSOURI

CASE NO. TE-2006-0053

**Jefferson City, Missouri
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)
AT&T Missouri, for a Waiver of Certain)
Requirements of 4 CSR 240-29.040(4).)

Case No. TE-2006-0053

AFFIDAVIT OF WILLIAM L. VOIGHT

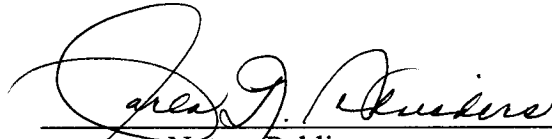
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

William L. Voight, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 13 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



William L. Voight

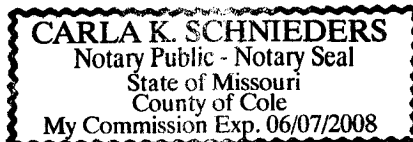
Subscribed and sworn to before me this 23rd day of March, 2006.



Notary Public

My commission expires

June 7, 2008



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1 appropriate, I also provide assistance to the Commission, upper management, and
2 members of the General Assembly on legislative matters.

3 **Q. What is your education and previous work experience?**

4 A. I received a Bachelor of Science degree with a major in economics from
5 Lincoln University in Jefferson City, Missouri. A copy of relevant work history is
6 attached as Schedule 1.

7 **Q. Have you previously testified before the Commission?**

8 A. Yes, a list of cases where I have served as a witness by providing
9 testimony is attached as Schedule 2.

10 **Q. What is the purpose of your Direct Testimony?**

11 A. My testimony addresses what has been identified as the sole issue in the
12 first phase of this case. Namely: Does Commission Rule 4 CSR 240-29.040(4) require
13 the originating tandem carrier to include the Calling Party Number (CPN) as part of the
14 Category 11-01-XX billing record that it provides for wireless-originated calls that transit
15 the LEC-to-LEC network and terminate to other LECs? My testimony concludes that the
16 rule does not.

17 **Q. Would the lack of CPN in the billing records for wireless-originated**
18 **calls defeat the whole purpose of adopting the Commission's Enhanced Record**
19 **Exchange (ERE) rules?**

20 A. In my opinion, it would not. In addition to addressing the legal liabilities
21 and establishing certainty for the business relationship of transiting traffic, the ERE rules
22 have largely accomplished the objective of reducing the number of billing discrepancies,
23 and making it easier to resolve those that might arise. The rules provide a means to

1 identify unidentified traffic, and help to ensure just compensation for the exchange of
2 LEC-to-LEC traffic, including transiting traffic. In order to satisfactorily accomplish
3 these objectives, the ERE rules established the following: (1) a requirement for carriers to
4 pass CPN to downstream carriers and ultimately to end users on each and every telephone
5 call,¹ (2) an option for terminating carriers to utilize separate trunk groups to better
6 manage their networks, (3) an option for terminating carriers to create accurate
7 terminating billing records should they choose not to rely on records developed by a
8 third-party, (4) a requirement for billing records to be created in a timely and consistent
9 manner, (5) a requirement for invoice payments to be made in a timely manner, (6) an
10 option for carriers to object to inaccurate billing invoices, (7) a requirement for carriers to
11 ensure customer privacy provisions, (8) a requirement for carriers to maintain
12 confidentiality of customer billing records, (9) implementation of a system of general
13 auditing provisions and, (10) establishment of a system to block (reroute) LEC network
14 traffic.

15 Prior to establishment of the ERE rules, the Commission was inundated with
16 docketed cases and informal allegations involving unaccounted-for, or “phantom”
17 telephone traffic occurring on the LEC-to-LEC network. Now that the rules are in place, I
18 am not aware of any instances or allegations of such traffic. In my opinion, the lack of
19 CPN within the billing records does not negatively impact other aspects of the ERE rules,
20 including the ten items identified above.

¹ End users must, of course, have Caller ID available to receive CPN.

1 **Q. Does the issue presented in this case impact the first requirement of**
2 **the ERE rule, as you have identified above, that carriers pass the CPN to**
3 **downstream carriers and ultimately to end users on each and every telephone call?**

4 A. No. The ERE rule will continue to require carriers to deliver CPN to
5 downstream carriers for every telephone call, regardless of the Commission's decision in
6 this proceeding.

7 **Q. Please explain.**

8 A. The ERE rules contemplate CPN to be delivered to downstream carriers in
9 two ways. One way is for CPN to be delivered to downstream carriers during the call's
10 transmission. For example, 4 CSR 240-29.040(1) and (2) place such a requirement on
11 originating and transiting companies, respectively. The issue presented in this case does
12 not pertain to the delivery of CPN during the transmission of the call. In other words,
13 CPN will continue to be required to be delivered during the transmission of both wireless
14 and wireline originated calls.

15 A second way contemplated by the ERE rules to deliver CPN to downstream
16 carriers is through a billing record produced by the originating tandem carrier that is
17 provided on a monthly or regular basis. The billing record might be considered similar to
18 a monthly statement of the calls transiting through the tandem carrier and ultimately
19 delivered to the terminating carrier. More precisely, 4 CSR 240-29.040(4) places a
20 requirement on originating tandem carriers to create a category 11-01-XX billing record
21 which can contain a variety of information. The terminating carrier uses the information
22 contained in this billing record to create an invoice to be sent to the carrier responsible for
23 payment of call termination charges. For clarity, I have attached as Schedule 3 an

1 example of a Missouri-specific Category 11-01-XX billing record, as customarily created
2 for LEC-to-LEC traffic. Additionally, Schedule 4 offers an example of Category 11
3 billing records created for IXC traffic.

4 Therefore, the issue presented in this case pertains to whether a category 11-01-
5 XX billing record should include CPN for wireless-originated traffic. Regardless of the
6 Commission's ruling in this case, CPN will continue to be delivered during the
7 transmission of a call. In addition, a category 11-01-XX billing record will continue to
8 contain CPN for wireline originated traffic.

9 **Q. Do you have any additional comments about how the ERE rules**
10 **attempt to assist terminating carriers in identifying the financially responsible party**
11 **for whom traffic is terminated?**

12 A. Yes. Terminating carriers essentially have two choices in identifying the
13 financially responsible party. One option is for the terminating carrier to create its own
14 billing record based on the CPN and other information delivered on each call. The ERE
15 rules attempt to ensure the terminating carrier will have the necessary tools in order to
16 create its own billing records.

17 A second option for the terminating carrier is to continue to rely on the billing
18 records created by the originating tandem carrier. Most, if not all, terminating carriers
19 are continuing to rely on the billing records of the originating tandem carrier. The ERE
20 rules have tried to ensure consistency and improved information contained in these
21 billing records. Such billing records produced by the originating tandem carrier may not
22 contain all of the information desired by the terminating carrier; however, the terminating

1 carrier has the choice of continuing to rely on the originating tandem carrier's billing
2 records, or to create its own billing records.

3 **Q. What then are the ramifications of not having CPN as part of the**
4 **billing records for wireless-originated telephone calls?**

5 A. Lack of CPN within the tandem-created billing records for wireless-
6 originated calls simply means that the terminating carrier will have no way of knowing
7 the end user who originated the wireless telephone call. The ability to identify the end
8 users who originate telephone calls permits the terminating carrier to determine the
9 originators of the calls. The ability to identify end users also permits terminating carriers
10 to verify the end users' wireless carriers as well. In many instances (but not all
11 instances), knowing the CPN will assist the terminating carrier in verifying the proper
12 jurisdiction of wireless-originated telephone calls. Billing records that contain CPN of
13 wireless-originated calls can aid terminating carriers in establishing practices which
14 reveal network usage. In my opinion, the lack of CPN within the billing record restricts,
15 perhaps severely, the ability of terminating carriers to institute general network auditing
16 guidelines. In my view, this is the only potential ramification of not including the CPN
17 as part of the tandem-created billing records for wireless-originated telephone calls
18 traversing Missouri's LEC-to-LEC network.

19 **Q. Does the lack of CPN within the billing record prevent the**
20 **terminating carrier from identifying the wireless carrier responsible for payment?**

21 A. No. In spite of the potential ramification for lack of CPN, lack of CPN
22 does not prevent the terminating carrier from knowing the responsible wireless carrier to
23 whom the bill should be sent.

1 **Q. Please explain why lack of CPN in tandem-created billing records for**
2 **wireless-originated telephone calls does not prevent knowing the responsible**
3 **wireless carrier for invoice purposes.**

4 A. Knowledge of the responsible wireless carrier for wireless-originated calls
5 traversing the LEC-to-LEC network is accomplished by the originating tandem carrier
6 inserting a “per-trunk billing number” in place of the CPN within the billing record. The
7 “per-trunk billing number” is a number which uniquely identifies the wireless carrier
8 directly connected to the LEC-to-LEC network; hence, the party responsible for paying
9 terminating compensation.²

10 **Q. Does the “per-trunk billing number” identify the originating carrier,**
11 **or the proper jurisdiction of the call?**

12 A. No, not in all instances. If an originating carrier contracts with another
13 carrier to deliver the call, the “per-trunk billing number” will not identify the carrier upon
14 whose network the call originated. Nor does the “per-trunk billing number” provide any
15 indication as to the proper jurisdiction of the call. Use of a “per-trunk billing number”
16 *instead of a CPN* removes any possibility for terminating carriers to independently
17 determine whether wireless carriers are paying reciprocal compensation for telephone
18 traffic that might otherwise be subject to exchange access charges.

19 **Q. Does CPN provide a reliable jurisdictional indicator for all wireless-**
20 **originated traffic?**

² The term “per-trunk billing number” is associated with Type 2A wireless interconnections, which provide a trunk side connection between a Mobile Switching Center (MSC) and a landline *tandem* office. Type I wireless interconnections use the nomenclature “billing account number,” and involve trunk side connections (line side treatment) between a MSC and a landline *end* office.

1 A. No, not for all wireless traffic. For wireless calls originated outside of a
2 Major Trading Area (MTA) to which the wireless number is assigned, use of CPN is not
3 a reliable jurisdictional indicator. Because of instances that are sometimes characterized
4 as “roaming,” such calls might appear to be subject to reciprocal compensation when in
5 fact they are subject to access charges. Depending on the number dialed, other calls
6 might be mistaken as subject to access charges, when in fact they are subject to reciprocal
7 compensation. As I have previously stated, wireless CPN is not a reliable jurisdictional
8 indicator in all instances; CPN should be used only in establishing general auditing
9 guidelines.

10 **Q. Can you explain what you mean by “general auditing guidelines”?**

11 A. Yes. I would characterize general auditing guidelines as methods used by
12 carriers to monitor activity occurring on telephone networks. In my opinion, general
13 auditing guidelines would entail the use of “test calls” as well as monitoring of CPN in
14 billing records to determine the presence of an excessive amount of interstate, interMTA
15 wireless-originated calls being terminated over local interconnection trunks instead of
16 access trunks. General auditing guidelines embrace a balance of network knowledge. On
17 the one hand, because of “roaming,” CPN cannot be used to determine the proper
18 jurisdiction of all wireless calls. On the other hand, it would seem axiomatic that not all
19 wireless calls are “roaming.” General auditing guidelines help to strike a balance
20 between the two extremes.

21 Just as many end users subscribe to caller identification service because they feel
22 a “need to know” who is calling on their telephone line, many carriers also feel a “need to
23 know” who is calling on their telephone network. In my opinion, knowledge of who is

1 using the telephone network is simply a good business practice. Moreover, *omission* of
2 CPN in billing records restricts the ability of terminating carriers to employ reasonable
3 practices designed to obtain such knowledge.

4 **Q. Mr. Voight, given the emphasis you seem to place on inclusion of CPN**
5 **as part of billing records, why has the Staff changed its mind about requiring that it**
6 **be included in the billing record?**

7 A. The Staff has always advocated the inclusion of CPN as part of the billing
8 records for all telephone calls, including those that are wireless-originated. The fact that
9 CPN is not included in the billing records of wireless-originated calls was first pointed
10 out in the February 1, 2005, written comments of the Missouri Independent Telephone
11 Company Group (MITG) in Case No. TX-2003-0301 (the ERE rulemaking case). Later,
12 on February 9, 2005, at the Public Hearing for Case No. TX-2003-0301, SBC Missouri
13 (now AT&T) responded to these allegations. In its response, SBC's attorney stated that
14 SBC's record-creation practices "conform to the industry standard."³ SBC's subject
15 matter expert produced a Telcordia Technologies document described as Generic
16 Requirements for Wireless Service Provider Automatic Message Accounting, referred to
17 as GR-1504-CORE, and testified on the differences in billing records for wireless calls
18 and other calls.⁴

19 After learning of the Telcordia document, the Staff continued to explore the
20 matter with the industry. Fundamentally, and in full recognition of the Telcordia
21 document, the Staff continued to explore the possibility of including wireless CPN in the

³ Transcript of Proceedings; page 86, line 18. February 9, 2005. Case No TX-2003-0301.

⁴ *Id.* Page 99, line 19.

1 billing records. On August 11, 2005, the Staff responded to a Commission order in Case
2 No. TX-2003-0301, in which the Staff stated the following:

3 Staff wishes to state its view that, absent compelling reasons
4 otherwise, the Commission should require SBC and other
5 transiting carriers to include the CPN in all category 11-01-XX
6 billing records, including those generated for wireless-originated
7 traffic. Staff notes that the very caption of Case No. TX-2003-0301
8 implies an intention for the origin of all intraLATA telephone calls
9 to be identified in billing records. The Staff submits that including
10 CPN in the category 11-01-XX billing record is an appropriate
11 means to identify originating carriers and glean information
12 concerning the carrier responsible for placing traffic on the LEC-
13 to-LEC network.

14 Requiring the inclusion of CPN as a part of AMA records will aid
15 in establishing general auditing guidelines for all LEC-to-LEC
16 network traffic. The Staff also notes SBC's acknowledgement that
17 its Northern Telecom tandem switches are currently configured
18 with the necessary feature to permit CPN to be "appended" to the
19 AMA record for wireless-originated calls. According to SBC,
20 further inquiries are necessary to determine if a similar feature can
21 be made available in its Lucent tandem switches.

22 On October 13, 2005, Tim Judge of SBC (now AT&T) provided me with vendor
23 information on the "estimated price range" and other information of equipping SBC's
24 Missouri Lucent switches with the functionality to capture CPN for wireless calls
25 traversing the LEC-to-LEC network. After evaluating the information, the Staff was
26 simply unwilling to recommend that SBC be required to make the investment. We felt
27 that the price information represented a compelling reason to abandon the idea.
28 Succinctly stated, the Staff concluded that the cost exceeded the expected benefits.

29 **Q. Mr. Voight, were there other reasons for the Staff to change its mind?**

30 A. Yes. By late 2005, the Staff had become aware of what we considered to
31 be progress at the national level in this area. Because of the evolution of number
32 portability and call roaming, use of ANI (Automatic Number Identification) is becoming

1 less attractive as a means to determine the geographic location of the originating party,
2 especially for wireless traffic.⁵ In particular, the Alliance for Telecommunications
3 Industry Solutions (ATIS) Network Interconnection Interoperability Forum (NIIF)
4 announced implementation of something referred to as Jurisdictional Information
5 Parameter (JIP) Billing. JIP billing is being advanced as one means to address the
6 situation. JIP billing essentially involves populating a six-digit number in the Signaling
7 System 7 (SS7) Initial Address Message for each telephone call. As I understand the
8 situation, the JIP code would identify the jurisdiction of the call. After the ATIS
9 announced industry consensus on JIP billing, the Staff was no longer desirous of pursuing
10 the matter at the state level.⁶

11 **Q. Does progress at the national level mean that Missouri should**
12 **abandon it's ERE rules?**

13 A. No, not at this time. As I have previously discussed, Missouri's ERE rules
14 continue to accomplish many important policy objectives. In particular, the ERE rules
15 codify the business relationship for transiting traffic, and implement a consistent
16 Category 11-01-XX form of record recording. Prior to establishment of the rules,
17 Missouri was mired with uncertainty of business relationships, and plagued with a system
18 of old-fashioned summary paper records creation.⁷ Equally important, the ERE rules

⁵ Primarily for engineering reasons, network engineers and other telecommunications professionals use different terminology to distinguish the ten-digit telephone number of the caller who originates the call. For the purposes of Missouri's ERE rules, the terms Caller Identification (Caller ID), Calling Number Delivery (CND), Calling Party Number (CPN), and automatic number identification (ANI) may be used interchangeably, as established and defined in 4 CSR 240-29.020(29).

⁶ The Staff obtained knowledge of JIP developments from different sources. One example is shown in a letter sent by AT&T to small Missouri carriers, a copy of which is attached as Schedule 5 to this testimony.

⁷ An example of Carrier Transitng Usage Summary Records (CTUSR), and a 2001 Accessible Letter from SBC to C-LECs, is shown as Schedule 6 to this testimony.

1 establish a set of local interconnection guidelines for all carriers using Missouri's local
2 exchange network. In my view, local interconnection rules are necessary and proper
3 because (understandably) the federal government does not have policies addressing the
4 issues covered by our state rules.

5 **Q. In Case No. TX-2003-0301, the Commission stated the following in its**
6 **May 11, 2005 Final Order of Rulemaking:**

7 We find that SBC has shown no credible evidence that the
8 Category 11-01-XX billing records it creates for wireless-
9 originated calls traversing the LEC-to-LEC network should be
10 different from the Category 11-01-XX billing records it creates for
11 wireline *and wireless*-originated calls traversing the interexchange
12 carrier network (Emphasis in original).

13 We thus determine that transiting carriers shall include the CPN as
14 part of the Category 11-01-XX records created for wireless-
15 originated traffic occurring over the LEC-to-LEC network. If any
16 carrier determines that it cannot or should not include the
17 originating CPN of wireless callers in the Category 11-01-XX
18 billing record, it is free to petition the Commission to be excluded
19 from that aspect of our rule.

20 **These comments were made by the Commission in response to written and public**
21 **comments provided by parties in the Enhanced Record Exchange (ERE)**
22 **rulemaking case. Does the Staff agree with the Commission's comments?**

23 A. The Staff certainly agreed with the comments when they were written
24 because they were entirely consistent with the record that had been developed at that
25 time. However, the consequences of varying from the Telcordia document previously
26 discussed were not fully understood until October 2005. It was not until SBC produced
27 the statement from Lucent that the Staff changed its mind in this matter.

28 **Q. Do you have an opinion as to whether 4 CSR 240-29.040(4) requires**
29 **inclusion of CPN as a part of the billing records?**

1 A. It is my opinion that it does not. The ERE rules, including 4 CSR 240-
2 29.040(4), merely require the creation of a Missouri-specific category 11-01-XX billing
3 record. The rules are not explicit enough to determine the precise make-up of those
4 records.⁸ If necessary, further analysis of the rule requirements and prior Commission
5 comments will be covered by my attorney in arguments and briefs.

6 **Q. Does this conclude your Direct Testimony?**

7 A. Yes, it does.

⁸ For a further discussion, please see "Discussion Item Eight" in the Staff's August 11, 2006 Response to Commission Order in Case No. TE-2006-0053.

William L. Voight

SUMMARY OF WORK EXPERIENCE

1974 – 1985 United Telephone Company, I began my telephone career on February 4, 1974, as a central office equipment installer with the North Electric Company of Gallion, Ohio. At that time, North Electric was the manufacturing company of the United Telephone System. My duties primarily included installation of all forms of central office equipment including power systems, trunking facilities, operator consoles, billing systems, Automatic Number Identification systems, various switching apparatuses such as line groups and group selectors, and stored program computer processors.

In 1976, I transferred from United's manufacturing company to one of United's local telephone company operations – the United Telephone Company of Indiana, Inc. I continued my career with United of Indiana until 1979, when I transferred to another United Telephone local operations company – the United Telephone Company of Missouri. From the period of 1976 until 1985, I was a central office technician with United and my primary duties included maintenance and repair of all forms of digital and electronic central office equipment, and programming of stored program computer processors. United Telephone Company is today known as **Embarq**.

1985-1988 In 1985, I began employment with **Tel-Central Communications, Inc.**, which at that time was a Missouri-based interexchange telecommunications carrier with principal offices in Jefferson City, Missouri. As Tel-Central's Technical Services Supervisor, my primary duties included overall responsibility of network operations, service quality, and supervision of technical staff. Tel-Central was eventually merged with and into what is today MCI.

In conjunction with Tel-Central, I co-founded **Capital City Telecom**, a small business, "non-regulated" interconnection company located in Jefferson City. As a partner and co-founder of Capital City Telecom, I planned and directed its early start-up operations, and was responsible for obtaining financing, product development, marketing, and service quality. Although Capital City Telecom continues in operations, I have since divested my interest in the company.

1988-1994 In 1988, I began employment with **Octel Communications Corporation**, a Silicon Valley-based manufacturer of Voice Information Processing Systems. My primary responsibilities included hardware and software systems integration with a large variety of Private Branch eXchange (PBX), and central office switching systems. Clients included a large variety of national and international Local Telephone Companies, Cellular Companies and Fortune 500 Companies. Octel Communications Corporation was later merged with Lucent Technologies.

1994-Present Missouri Public Service Commission

William L. Voight

TESTIMONY EXPERIENCE

Case No. TR-96-28	In the Matter of Southwestern Bell's tariff sheets designed to increase Local and Toll Operator Service Rates.
Case No. TT-96-268	In the Matter of Southwestern Bell Telephone Company's tariffs to revise PSC Mo. No. 26, Long Distance Message Telecommunications Services Tariff to introduce Designated Number Optional Calling Plan.
Case No. TA-97-313	In the Matter of the Application of the City of Springfield, Missouri, through the Board of Public Utilities, for a Certificate of Service Authority to Provide Nonswitched Local Exchange and Intrastate Interexchange Telecommunications Services to the Public within the State of Missouri and for Competitive Classification.
Case No. TA-97-342	In the Matter of the Application of Max-Tel Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.
Case No. TA-96-345	In the Matter of the Application of TCG St. Louis for a Certificate of Public Convenience and Necessity to provide Basic Local Telecommunication Services in those portions of St. Louis LATA No. 520 served by Southwestern Bell Telephone Company.
Case No. TO-97-397	In the Matter of the Petition of Southwestern Bell Telephone Company for a Determination that it is Subject to Price Cap Regulation Under Section 392.245 RSMo. (1996).
Case No. TC-98-337	Staff of the Missouri Public Service Commission, Complainant, vs. Long Distance Services, Inc., Respondent.
Case No. TO-99-227	Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996.
Case No. TA-99-298	In the Matter of the Application of ALLTEL Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.
Case No. TO-99-596	In the Matter of the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri.
Case No. TO-99-483	In the Matter of an Investigation for the Purpose of Clarifying and Determining Certain Aspects Surrounding the Provisioning of Metropolitan Calling Area Service After the Passage and Implementation of the Telecommunications Act of 1996.

Case No. TO-01-391	In the Matter of a further investigation of the Metropolitan Calling Area Service after the passage and implementation of the Telecommunications Act of 1996.
Case No. TO-01-416	In the Matter of Petition of Fidelity Communications Services III, Inc. Requesting Arbitration of Interconnection Agreement Between Applicant and Southwestern Bell Telephone Company in the State of Missouri Pursuant to Section 252 (b)(1) of the Telecommunications Act of 1996.
Case No. TO-01-467	In the Matter of the Investigation of the State of Competition in the Exchanges of Southwestern Bell Telephone Company.
Case No. TT-02-129	In the Matter of AT&T Communications of the Southwest, Inc.'s Proposed Tariff to Establish a Monthly Instate Connection Fee and Surcharge.
Case No. TC-02-1076	Staff of the Missouri Public Service Commission, Complainant, vs. BPS Telephone Company, Respondent.
Case No. TK-04-0070	In the Matter of the Application of American Fiber Systems, Inc. for Approval of an Agreement with Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, Under the Telecommunications Act of 1996.
Case No. CO-2005-0066	In the Matter of the Confirmation of Adoption of an Interconnection Agreement with CenturyTel of Missouri, LLC d/b/a CenturyTel and Spectra Communications Group, LLC d/ba CenturyTel by Socket Telecom, LLC
Case No. TO-2003-0257	In the Matter of the Request from the Customers in the Rockaway Beach Exchange for an Expanded Calling Scope to Make Toll-Free Calls to Branson
Case No. IO-2006-0086	Application of Sprint Nextel Corporation for Approval of the Transfer of Control of Sprint Missouri, Inc., Sprint Long Distance, Inc. and Sprint Payphone Services, Inc. From Sprint Nextel Corporation to LTD Holding Company.
Case No. LT-2006-0162	In the Matter of Tariff No. 3 of Time Warner Cable Information Services (Missouri), LLC, d/b/a Time Warner Cable.
Case No. TM-2006-0272	In the Matter of the Application for Approval of the Transfer of Control of Alltel Missouri, Inc. and the Transfer of Alltel Communications, Inc. Interexchange Service Customer Base.

Category 92-01 vs. MO Category 11-01

92-01-XX				MO 11-01-XX				Value
1	Category	Record Identification	9	1	Category	Record Identification	1	
2			2	2			1	
3	Group		0	3	Group		0	
4			1	4			1	
5	Record Type	Date of Record	X	5	Record Type	Date of Record	X	
6			X	6			X	
7	Year			7	Year			
8				8				
9	Month	Date of Record		9	Month	Date of Record		Same
10				10				
11	Day			11	Day			
12				12				
13	From Number	From Number		13	From Number	From Number		default '10'
14	Length			14	Length			
15	NPA			15	NPA			
16				16				
17		From Number		17		From Number		
18	NXX			18	NXX			Same
19				19				
20				20				
21	Line Number	From Number		21	Line Number	From Number		
22				22				
23				23				
24				24				
25	Overflow Digits	From Number		25	Overflow Digits	From Number		set to '000'
26				26				
27				27				
28				28				
29	To Number Length	To Number		29	To Number Length	To Number		default '10'
30				30				
31	NPA			31	NPA			
32				32				
33	NXX	To Number		33	NXX	To Number		Same
34				34				
35				35				
36	Line Number			36	Line Number			
37		Charge Or Amount Collected		37		Charge Or Amount Collected		
38				38				
39				39				
40				40	Orig/Term ID			2 = Terminating 1-Orig 800
41	\$	Charge Or Amount Collected		41	BSA/Feature Group D Trunk Group Number	Charge Or Amount Collected		Zero Fill
42				42				
43				43				
44				44				
45	Cents	Charge Or Amount Collected		45	Reserved	Charge Or Amount Collected		Zero Fill
46	Mill			46	Carrier Identification			Should be '0000'
47	Type of Regulation Indicator			47				
48				48				
49	\$	State Tax		49		State Tax		
50				50	Carrier Access Method			Zero Fill
51	cents			51	Routing Method			default = 1 (tandem)
52	\$			52	Dialing Method			Zero Fill
53		Local Tax		53	ANI	Local Tax		Zero Fill
54	cents			54	NCTA			Zero Fill
55	Hr			55	Hr			
56				56				
57	Min	Connect Time		57	Min	Connect Time		Same as Positions 55-60 in 92-01 Record
58				58				
59	Sec			59	Sec			
60				60				

Category 92-01 vs. MO Category 11-01

61		Billable Or Reported Time
62	Min	
63	Sec	
64	1/10	
65	Method of	
66	Recording	
67	Return	
68	Code	
69	From RAO	
70	Local	
71	Company	
72	Information	
73	Rate Period	
74	Rate Class	
75	Message Type	
76	IOC Code/Term WATS	
77	Band	
78	1	Indicators
79	2	
80	3	
81	4	
82	5	
83	6	
84	7	
85	8	
86	9	
87	10	
88	11	
89	12	
90	13	
91	14	
92	15	
93	16	
94	17	
95	18	
96	19	
97	20	
98	Operator	
99	Unit	
100	Recording	
101	Point	
102	Identification	
103	(AMA)	
104	Billing RAO	
105	Billing Number	
106	North	
107	American	
108	Standard	
109		
110		
111		
112		
113		
114		
115		
116		
117		
118		
119		
120		

61		Billable Or Reported Time	Same as Positions 61-67 in 92-01 Record
62	Min		
63			
64			
65	Sec		
66			
67	1/10		
68	Method of		Same
69	Recording		
70	Reserved		Zero Fill
71			
72	From RAO		Same
73			
74			
75	Local		Zero fill
76	Company		
77	Information		
78	Type of Access	Service	Zero Fill
79			
80	Message Type		Same
81	Method of Signaling		Zero Fill
82	1	Indicators	All Indicators Same in both records
83	2		
84	3		
85	4		
86	5		
87	6		
88	7		
89	8		
90	9		
91	10		
92	11		
93	12		
94	13		
95	14		
96	15		
97	16		
98	17		
99	18		
100	19		
101	20		
102	Operator		Same
103	Unit		
104	Recording Point Indentification (AMA)		Same
105			
106			
107			
108			
109			
110	CABS Billing RAO		default '000'
111			
112			
113	21	Indicators	Same as Positions 158-167 in 92-01 Record
114	22		
115	23		
116	24		
117	25		
118	26		
119	27		
120	28		

Category 92-01 vs. MO Category 11-01

122		
123		
124	\$	Coin Tariff Amt
125		
126	Cents	
127		
128	\$	Coin Fed Tax
129		
130		
131	Cents	
132	SSAS	
133	Code	
134	CnCrCd	
135		
136	North	
137	American	
138	To	
139	Place	
140		
141		
142		
143		
144		
145	No. American	
146	To State	
147	Library	
148	Code	
149	Settlement Code	
150		
151	Carrier	
152	Identification	
153		
154		
155	Reserved	
156		
157		
158	21	
159	22	
160	23	
161	24	
162	25	
163	26	
164	27	
165	28	
166	29	
167	30	
168		
169	Originating OCN	
170	of UNE Customer	
171	Orig/Term Indicator on	
172	UNE records only	
173	1=Orig/2=Term	
174	Transport ID	
175	Reserved	

121	29		IND. 29 set to value of '6': denoting a 92-01 detail record was used to create the record
122	30		
123	NPA		
124			
125		BSA/	
126	NXX	Feature Group A	
127		Access	
128		Number	Zero Fill
129	Line		
130	Number		
131			
132			
133			
134			
135	Reserved for		
136	Local Company Use		Zero Fill
137			
138			
139	NECA		
140	Company Code		Zero Fill
141			
142	BSA/Feature Group D		Populate with '10'
143	Call Event Status		for Answered
144	Reserved		Zero Fill
145			
146	BSA/Feature Group ID Code		Populate with 'C'
147	Library		Same
148	Code		
149	Settlement Code		Same
150			
151	Min	Conversation	
152		Time	Same as Positions
153			61-67 in 92-01 Record
154	Sec		Conversation Minutes
155			
156	1/10		
157			
158			
159	Originating LRN		Populate Originating LRN
160			
161			
162			
163			
164			
165			
166			
167	Originating OCN		Originating LEC NECA OCN
168			associated with NPA-NXX
169			in positions 15-20 of this record
170			(table 80 driven) or use LRN
171	Originating LRN Source Indicator		npanxx if pos.157-166 is
172			populated (table 80 driven)
173	Terminating LRN		Zero Fill
174			
175			
176			
177			
178			
179			
180			
181			
182			
183			
184			
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300			

LRN Substitution Performed (Value=0 or 1)			
176	Originating LRN	175	
177		176	
178		177	
179		178	
180		179	
181		180	
182		181	
183		182	
184	Terminating LRN	183 Terminating OCN	Terminating LEC NECA OCN associated with NPA-NXX
185		184	in positions 30-35 NPANXX of this record (table 80 driven) or use LRN NPANXX if pos.172-181 is populated(table 80 driven)
186		185	
187		186 Terminating LRN Source Indicator	Zero Fill
188		187	Receiving LEC OCN
189		188 Send to OCN 4 position alphanumeric field that identifies the company that will receive the record	
190		189	
191		190	
192	Billing LRN	191 Reserved	Zero Fill as done today
193		192	
194		193	
195		194	
196		195	
197		196	
198		197	
199		198	
200	Reserved	199	
201		200	
202		201	
203		202	
204		203	
205		204	
206		205	
207		206	
208	Originated recording only	207	
209		208	
210		209	
	Terminating UNE company	210	

for 1xc calls
created by Small carrier

CATEGORY II
GROUP 01, RECORD 01
USED TO RPT ACC MIN FGC MTS

POS	DESCRIPTION	SUB-DESCRIPTION	Notes
1	RECORD IDENTIFICATION	CATEGORY	
2	RECORD IDENTIFICATION	CATEGORY	
3	RECORD IDENTIFICATION	GROUP	
4	RECORD IDENTIFICATION	GROUP	
5	RECORD IDENTIFICATION	RECORD TYPE	
6	RECORD IDENTIFICATION	RECORD TYPE	
7	DATE OF RECORD	YEAR	
8	DATE OF RECORD	YEAR	
9	DATE OF RECORD	MONTH	
10	DATE OF RECORD	MONTH	
11	DATE OF RECORD	DAY	
12	DATE OF RECORD	DAY	
13	FROM NUMBER LENGTH		
14	FROM NUMBER LENGTH		
15	*FROM BASE STATION NUMBER *FROM NUMBER	NPA	
16	*FROM BASE STATION NUMBER *FROM NUMBER	NPA	
17	*FROM BASE STATION NUMBER *FROM NUMBER	NPA	
18	*FROM BASE STATION NUMBER *FROM NUMBER	NXX	
19	*FROM BASE STATION NUMBER *FROM NUMBER	NXX	
20	*FROM BASE STATION NUMBER *FROM NUMBER	NXX	
21	*FROM BASE STATION NUMBER *FROM NUMBER	LINE NUMBER	Do not zero fill unless it is LRN
22	*FROM BASE STATION NUMBER *FROM NUMBER	LINE NUMBER	Do not zero fill unless it is LRN
24	*FROM BASE STATION NUMBER *FROM NUMBER	LINE NUMBER	Do not zero fill unless it is LRN
24	*FROM BASE STATION NUMBER *FROM NUMBER	LINE NUMBER	Do not zero fill unless it is LRN
25	OVERFLOW DIGITS		
26	OVERFLOW DIGITS		
27	OVERFLOW DIGITS		
28	TO NUMBER LENGTH		
29	TO NUMBER LENGTH		
30	*TO BASE STATION NUMBER *TO NUMBER	NPA	
31	*TO BASE STATION NUMBER *TO N*TO BASE STATION NUMBER *TO NUMBER UMBER	NPA	
32	*TO BASE STATION NUMBER *TO NUMBER	NPA	
33	*TO BASE STATION NUMBER *TO NUMBER	NXX	
34	*TO BASE STATION NUMBER *TO NUMBER	NXX	
35	*TO BASE STATION NUMBER *TO NUMBER	NXX	
36	*TO BASE STATION NUMBER *TO NUMBER	LINE NUMBER	
37	*TO BASE STATION NUMBER *TO NUMBER	LINE NUMBER	
38	*TO BASE STATION NUMBER *TO NUMBER	LINE NUMBER	
39	*TO BASE STATION NUMBER *TO NUMBER	LINE NUMBER	

CATEGORY 11
GROUP 01, RECORD 01
USED TO RPT ACC MIN FGC MTS

POS	DESCRIPTION	SUB-DESCRIPTION	Notes
40	ORIGINATING / TERMINATING ID		
41	BSA / FEATURE GROUP D TRUNK GROUP NUMBER		
42	BSA / FEATURE GROUP D TRUNK GROUP NUMBER		
43	BSA / FEATURE GROUP D TRUNK GROUP NUMBER		
44	BSA / FEATURE GROUP D TRUNK GROUP NUMBER		
45	RESERVED		
46	CARRIER IDENTIFICATION		CIC if available, else zero fill
47	CARRIER IDENTIFICATION		CIC if available, else zero fill
48	CARRIER IDENTIFICATION		CIC if available, else zero fill
49	CARRIER IDENTIFICATION		CIC if available, else zero fill
50	CARRIER ACCESS METHOD		
51	ROUTING METHOD		
52	DIALING METHOD		
53	ANI		
54	NCTA		
55	CONNECT TIME	HOUR	
56	CONNECT TIME	HOUR	
57	CONNECT TIME	MINUTE	
58	CONNECT TIME	MINUTE	
59	CONNECT TIME	SECOND	
60	CONNECT TIME	SECOND	
61	BILLABLE OR REPORTED TIME	MINUTE	
62	BILLABLE OR REPORTED TIME	MINUTE	
63	BILLABLE OR REPORTED TIME	MINUTE	
64	BILLABLE OR REPORTED TIME	MINUTE	
65	BILLABLE OR REPORTED TIME	SECOND	
66	BILLABLE OR REPORTED TIME	SECOND	
67	BILLABLE OR REPORTED TIME	1/10	
68	METHOD OR RECORDING		
69	METHOD OR RECORDING		
70	RESERVED		
71	RESERVED		
72	FROM RAO		
73	FROM RAO		
74	FROM RAO		
75	CUSTOMER BILL FORMAT	LOCAL COMPANY INFORMATION	
76	CONFERENCE LEG NUMBER		
77	CONFERENCE LEG NUMBER		
78	TYPE OF ACCESS SERVICE		
79	TYPE OF ACCESS SERVICE		
80	MESSAGE TYPE		
81	METHOD OF SIGNALING		
82	INDICATORS		
83	INDICATORS		
84	INDICATORS		
85	INDICATORS		
86	INDICATORS		
87	INDICATORS		
88	INDICATORS		
89	INDICATORS		
90	INDICATORS		
91	INDICATORS		
92	INDICATORS		
93	INDICATORS		
94	INDICATORS		

CATEGORY 11
GROUP 01, RECORD 01
USED TO RPT ACC MIN FGC MTS

POS	DESCRIPTION	SUB-DESCRIPTION	Notes	C
95	INDICATORS			
96	INDICATORS			
97	INDICATORS			
98	INDICATORS			
99	INDICATORS			
100	INDICATORS			
101	INDICATORS			
102	SERIAL NUMBER	OPERATOR UNIT		
103	SERIAL NUMBER	OPERATOR UNIT		
104	SERIAL NUMBER	RECORDING POINT IDENTIFICATION (AMA)		
105	SERIAL NUMBER	RECORDING POINT IDENTIFICATION (AMA)		
106	SERIAL NUMBER	RECORDING POINT IDENTIFICATION (AMA)		
107	SERIAL NUMBER	RECORDING POINT IDENTIFICATION (AMA)		
108	SERIAL NUMBER	RECORDING POINT IDENTIFICATION (AMA)		
109	SERIAL NUMBER	RECORDING POINT IDENTIFICATION (AMA)		
110	CABS BILLING RAO			
111	CABS BILLING RAO			
112	CABS BILLING RAO			
113	INDICATORS			
114	INDICATORS			
5	INDICATORS			
116	INDICATORS			
117	INDICATORS			
118	INDICATORS			
119	INDICATORS			
120	INDICATORS			
121	INDICATORS	Indicator 29	Value of 6 is okay	
122	INDICATORS			
123	BSA / FEATURE GROUP A ACCESS NUMBER	NPA		
124	BSA / FEATURE GROUP A ACCESS NUMBER	NPA		
125	BSA / FEATURE GROUP A ACCESS NUMBER	NPA		
126	BSA / FEATURE GROUP A ACCESS NUMBER	NXX		
127	BSA / FEATURE GROUP A ACCESS NUMBER	NXX		
128	BSA / FEATURE GROUP A ACCESS NUMBER	NXX		
129	BSA / FEATURE GROUP A ACCESS NUMBER	LINE NUMBER	Preference is not zero filled, but not critical	
130	BSA / FEATURE GROUP A ACCESS NUMBER	LINE NUMBER	Preference is not zero filled, but not critical	
131	BSA / FEATURE GROUP A ACCESS NUMBER	LINE NUMBER	Preference is not zero filled, but not critical	
132	BSA / FEATURE GROUP A ACCESS NUMBER	LINE NUMBER	Preference is not zero filled, but not critical	
133	RESERVED FOR LOCAL COMPANY USE		Do not populate	
134	RESERVED FOR LOCAL COMPANY USE		Do not populate	
135	RESERVED FOR LOCAL COMPANY USE			
6	RESERVED			
137	RESERVED			

CATEGORY 11
GROUP 01, RECORD 01
USED TO RPT ACC MIN FGC MTS

POS	DESCRIPTION	SUB-DESCRIPTION	Notes	C
138	NECA COMPANY CODE		Originating LEC State Specific OCN	
139	NECA COMPANY CODE		Originating LEC State Specific OCN	
140	NECA COMPANY CODE		Originating LEC State Specific OCN	
141	NECA COMPANY CODE		Originating LEC State Specific OCN	
142	BSA / FEATURE GROUP D CALL EVENT STATUS			
142	BSA / FEATURE GROUP D CALL EVENT STATUS			
144	RESERVED			
145	RESERVED			
146	BSA / FEATURE GROUP ID CODE			
147	LIBRARY CODE			
148	LIBRARY CODE			
149	SETTLEMENT CODE			
150	CONVERSATION TIME	MINUTE		
151	CONVERSATION TIME	MINUTE		
152	CONVERSATION TIME	MINUTE		
153	CONVERSATION TIME	MINUTE		
154	CONVERSATION TIME	SECOND		
155	CONVERSATION TIME	SECOND		
156	CONVERSATION TIME	1/10		
157	RESERVED			
158	RESERVED			
159	RESERVED			
160	RESERVED			
161	RESERVED			
162	RESERVED			
163	RESERVED			
164	RESERVED			
165	RESERVED			
166	RESERVED			
167	RESERVED			
168	RESERVED			
169	RESERVED			
170	RESERVED			
171	RESERVED			
172	RESERVED			
173	RESERVED			
174	RESERVED			
175	RESERVED			



April 1, 2005

Dear

AT&T wishes to call your attention to the potential for misjurisdictionalization of wireless roamer access traffic. As you are aware, access charges should be based on the physical locations of the calling and called parties. For wireline calls, use of the calling and called party numbers provides a satisfactory surrogate for identifying the originating and terminating points of the call and determining whether intrastate or interstate switched access charges should apply. Unlike wireline calls, however, wireless calls are mobile, and, therefore, the use of calling and called party numbers does not provide an adequate surrogate for identifying the geographic location of a wireless phone. Consequently, use of the calling and called party number to establish the jurisdiction of such calls has resulted in instances where interstate wireless calls originating from one state and terminating in the home state of the wireless number ("wireless roamer" traffic) are billed incorrectly at intrastate access rates. A substantial amount of AT&T's terminating long distance traffic consists of wireless roamer traffic, and, as a result of the misbilling of this traffic, AT&T has been paying the higher intrastate rate rather than the lower interstate access rate.

In November 2004, the Ordering and Billing Forum (OBF) recognized this problem and adopted seven Rules for Populating JIP (Jurisdictional Information Parameter), approved by NIIF (Network Interconnection Interoperability Forum) in NIOC (Network Inter-Operability Committee) Issue 0208 to identify the originating switch or MSC as the physical location of a wireless originated call.

Now that these rules have been adopted, AT&T expects that you will accurately jurisdictionalize your terminating wireless roamer access traffic based on JIP. If you are currently unable to implement this change to your billing processes and systems, however, then you should utilize the terminating PIU factor provided by AT&T for all terminating traffic. Effective with the factors provided for third quarter 2005, AT&T will utilize JIP as the originating location of a wireless call. Failure to implement either of these solutions (incorporation of JIP to the billing process or full use of the AT&T provided terminating PIU) will result in AT&T claims and potential withholding of payments for the misjurisdictionalized traffic.

Please note on the attached your company's proposed resolution to this issue and return it by mail or fax to (770) 750-3802 by April 15, 2005.

AT&T Connectivity Billing Management
600 North Point Parkway
Apharetta, GA 30005-4136

Please complete and return to AT&T by April 15, 2005

Company Code:

Company Name:

How do you currently determine jurisdiction for switched access billing?

- ☐ Calling Party Number (CPN) to Called Party Number (CdPN)
- ☐ AT&T provided PIU factor for all MOU
- ☐ CPN to CdPN where known; Customer provided PIU for unknown

How do you currently determine terminating access jurisdiction for wireless originated MOU?

- ☐ Calling Party Number (CPN) to Called Party Number (CdPN)
- ☐ Jurisdiction Information Parameter (JIP) to Called Party Number (CdPN)
- ☐ Other (Please describe below)

With regard to the enclosed letter, which billing process will be implemented to accurately bill wireless originated-wireline terminated switched access MOU by your company?

- ☐ Jurisdiction Information Parameter (JIP) to Called Party Number (CdPN)
- ☐ AT&T provided factor (using JIP) for ALL terminating switched MOU
- ☐ Other (Please describe below)

Please indicate the effective date or target effective date for billing process changes associated with the above:

Who may we contact at your company with questions or concerns? Please include Phone Number and/or E-mail address:

Thank you for your prompt attention to this matter.

Report ID: Detail

Date: 09/19/2002

Transiting Usage Summary Report

Detail Records

Missouri

August 2002 Usage Month

ILEC

Terminating Company: XYZ

Originating Company	Messages	Minutes
Company A	122	207
Company B	30	173
Company C	8	19
Company D	18	36
Company E	511	1758
Company F	7	32
Total for XYZ Incumbent Local Exchange Carrier	696	2225

Report ID: Detail -

Date: 09/19/2002

Transiting Usage Summary Report

Detail Records (OPH Traffic)

Missouri

August 2002 Usage Month

ILEC

Terminating Company: XYZ

Originating Company	Messages	Minutes
Company A	3	5
Total for XYZ Incumbent Local Exchange Carrier	3	5

Accessible

Southwestern Bell

Date: **August 15, 2001**Number: **CLEC01-231**Effective Date: **August 24, 2001**Category: **Other**

Subject: **(BUSINESS PROCESSES) Transiting Usage Summary Reports to Provide
Originating LEC Information on Certain IntraLATA Traffic Transiting Across
SWBT's Facilities**

Related Letters: **NA**States Impacted: **Southwestern Bell Region**Response Deadline: **NA**Contact: **Account Manager**Conference Call/Meeting: **NA**

Southwestern Bell Telephone Company (SWBT) has been requested to provide transiting usage information to assist terminating Local Exchange Carriers (Terminating LECs) in identifying the originating Local Exchange Carriers (Originating LECs) of certain intraLATA traffic.

Beginning August 24, 2001, SWBT will begin sending out Transiting Usage Summary Reports to Terminating LECs in order to assist them in identifying the LECs that originated certain intraLATA traffic. The subject IntraLATA traffic is originated from another LEC's network, is subsequently transited across SWBT's facilities, and is then completed on the Terminating LEC's network. The Transiting Usage Summary Reports will provide the Terminating LECs with summary level message and minute information by type of record on each identified Originating LEC.

Specifically, the Transiting Usage Summary Reports will contain the following information: the data month for which the report applies, the State to which the report applies, the name and Operating Company Number (OCN) of the Terminating LEC, and will list each Originating LEC by name and OCN, including the volume of messages and minutes by record type originated by each Originating LEC and terminated on the Terminating LEC's network. These reports will be clearly marked as "Proprietary Data".

It is SWBT's intent to facilitate the identification of intraLATA traffic, when possible, and it is SWBT's position that it is not responsible for any payments to Terminating LECs for any traffic originated by another LEC and/or for any traffic that is not originated by a SWBT end-user customer. In those instances where the Terminating LEC is not currently receiving usage records directly from the Originating LEC(s), the Terminating LEC should contact the Originating LEC(s) in order to establish an appropriate business relationship so that adequate network engineering, routing, and compensation issues can be addressed between those two carriers.

Southwestern Bell Telephone
1816 Guadalupe, Room 519
Austin, Texas 78701
Phone: 512.570.5700
Fax: 512.570.1857

Ronald B. Elmore
Assistant Vice President-
Industry Markets
Exchange Carrier Relations

Southwestern Bell



August 20, 2001

Attached is a copy of an Accessible letter which has been mailed to CLECs in Missouri, Oklahoma, Kansas, Arkansas, and Texas. A similar letter was also mailed to wireless carriers in those states.

The information contained in the attached Accessible letter applies to all LECs that transit SWBT's network. Thus, we are notifying you and these other carriers, that we intend to share as much information as we have available to us, concerning intraLATA traffic that passes through our tandems and is then terminated to other LECs. This information will be specific to the terminating company, and will be summary in nature concerning the traffic of the originating company.

Please note that this information is being provided as a facilitating tool for terminating companies to identify the originating companies sending them traffic. It is SWBT's position that it is not responsible for any compensation to terminating LECs for this third party originated traffic. In the event that the terminating LEC is not receiving records or compensation from the originating carrier, the terminating LEC should contact the originating company to establish the appropriate business relationship for this traffic.

Please direct questions to your account manager.

Sincerely,