

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

In the Matter of an Investigation of Union Electric)
Company d/b/a AmerenUE's Storm Preparation) Case No. EO-2007-0037
And Restoration Efforts in Eastern Missouri)

AT&T MISSOURI'S RESPONSE

AT&T Missouri,¹ pursuant to the Missouri Public Service Commission's ("Commission") Order Inviting Response,² respectfully submits this response to the Missouri Public Service Commission's Staff ("Staff") report concerning AmerenUE's storm preparation and restoration efforts, filed November 17, 2006.

1. Staff Recommendation No.10 concerning Notification of Call Gapping. Staff's report makes the following recommendation:

AmerenUE should continue discussions with AT&T regarding notification whenever call gapping is to be implemented on switches that affect the provision of critical AmerenUE services.³

As indicated in Staff's report, AmerenUE and AT&T Missouri met on August 3, 2006, to discuss AT&T Missouri's application of call gapping during the July 19 and 21, 2006 storm outages. Call gapping is a standard emergency network traffic control measure telephone companies employ on a temporary basis to prevent an extremely large number of calls to a particular telephone number from overloading central office switches. Specifically, this control measure limits the number of calls that can be completed to a particular terminating number to ensure network resources are available to complete calls

¹ Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri will be referred to in this pleading as "AT&T Missouri." It previously conducted business as "SBC Missouri."

² Order Inviting Response and Setting-on-the-Record Presentation, EO-2007-0037, issued December 6, 2006 at page 1.

³ Staff's Storm Report, page 54.

unrelated to the number being mass called.⁴ Once this control is applied, telephone companies monitor the network for the duration of the mass calling event and continually adjust the level of call gapping based on network load factors in the affected areas. Without call gapping protections, central office switches could become locked up and unable to process all calls, resulting in a severe network outage.

During the August 3, 2006 meeting, AmerenUE requested AT&T Missouri to proactively notify AmerenUE in the future when AT&T Missouri applies call gapping controls. Subsequently, AmerenUE and AT&T Missouri continued to meet on numerous occasions, both in person and by conference calls, to explore what could be done and to develop a notification process both companies could support going forward.

As a result of these meetings, AT&T Missouri has committed to AmerenUE that AT&T Missouri will positively notify AmerenUE approximately 15 minutes after call gapping controls are applied to AmerenUE's lead telephone numbers and identify the telephone company exchanges in which the controls were implemented. In addition, AT&T Missouri committed in such instances to open an informational service ticket for Ameren; to establish a teleconference bridge for the use of AmerenUE personnel to communicate with AT&T Missouri network and account teams; to monitor AmerenUE trunk groups during an event; to adjust the call gapping as required to maintain availability; to remove call gapping controls as soon as switching conditions recover to normal; and to make positive contact with AmerenUE when AT&T Missouri closes the informational service ticket.

⁴ Call gapping controls also allow more traffic to complete to 911. It should be noted that traffic controls are never placed on 911 traffic.

AmerenUE and AT&T Missouri have tested this new procedure and believe that it should provide AmerenUE with the information it has requested if call gapping controls are applied to AmerenUE telephone numbers in the future.

2. Staff Recommendation No.18 concerning Backup Power Requirements. Staff's report makes the following recommendation:

The Commission may want to give consideration to expanding its current backup power requirement to include battery reserves and/or generators for Digital Line Carrier and NODE locations as well as the customers' location.⁵

As indicated in Staff's report, the Commission's current rules require telecommunications companies to make reasonable provisions to meet emergencies from power service failures and to inform their employees of procedures to be followed in the event of emergency to prevent or minimize interruption or impairment of telecommunications service.⁶

In AT&T Missouri's view, the rule as currently written and the inherent need to offer reliable, high quality service provides sufficient incentive for a telecommunications company to make provisions for backup power at points in its network where commercial power is needed. For its part, AT&T Missouri provides back up power where needed in its network, consistent with the company's emergency service restoration plan and was able to keep the vast majority of its customers in service. During the July 19 and 21, 2006 storm outages, AT&T Missouri lost commercial power to 20 central offices in the St. Louis area. These offices were able to continually maintain service to over 850,000 customers through the use of battery backup systems and backup diesel generators. AT&T Missouri also lost commercial power at various points to approximately 150 remote terminals, most of which were kept in service through

⁵ Staff's Storm Report, page 76.

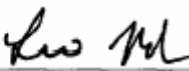
⁶ 4 CSR 240-32.060. This rule also provides specific back up power requirements for telecommunications company central offices.

alternative power supplies (e.g., AT&T Missouri used the generators from its technicians' trucks, power carts and portable generators). At the high point of the restoration, AT&T Missouri had approximately 75 remote terminals being served by generators, which helped to keep roughly 45,000 customers in service⁷ and outages to a relatively short duration.

AT&T Missouri, however, would note that different technologies, such as Voice over Internet Protocol ("VoIP") service or fiber to the premises ("FTTP"), can be used to provide telephone service and that those technologies have different power requirements than the circuit switched network provided over copper cable that AT&T Missouri maintains to provide service. In considering this Staff recommendation, the Commission should not adopt rules that would effectively preclude a technology from being made available. New technologies bring new functionality and new services to customers and the Commission should avoid taking actions that would disincent investment in new technology.

Respectfully submitted,

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⁷ This estimate is based on the assumption that there are on average approximately 600 assigned telephone numbers per remote terminal.

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on December 21, 2006.



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