

Exhibit No.:  
Issue: Telephone Specific  
Witness: William L. Voight  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Rebuttal Testimony  
Case No.: TE-2006-0053  
Date Testimony Prepared: April 7, 2006

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**WILLIAM L. VOIGHT**

**FILED<sup>2</sup>**

MAY 16 2006

**AT&T MISSOURI**

Missouri Public  
Service Commission

**CASE NO. TE-2006-0053**

**Jefferson City, Missouri**

Exhibit No. 7  
Date 4-18-06 Case No. TE-2006-0053  
Reporter PF

**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**

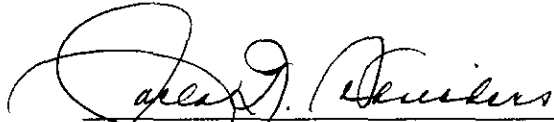
STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

WILLIAM L. VOIGHT, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 7 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal 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.



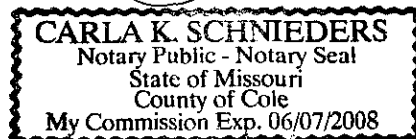
William L. Voight

Subscribed and sworn to before me this 7<sup>th</sup> day of April, 2006.



Notary Public

My commission expires June 7, 2008



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1           **Q.     What is the difference in IXC traffic and LEC-to-LEC traffic?**

2           A.     The differences in the two traffic types are set forth in 4 CSR 240-29.010  
3           (15) and (19). IXC traffic is that which traverses an interexchange carrier's point  
4           of presence; LEC-to-LEC (or simply "LEC") traffic is that which does not.

5                     In my opinion, the differences are substantial. For example, all traffic  
6           carried on the IXC network is subject to access charges (even when the telephone  
7           call is originated and terminated within the same local calling scope). Because  
8           access charges apply, all traffic occurring on the IXC network is considered "long  
9           distance" for the purposes of inter-carrier compensation. On the other hand,  
10          traffic carried on the LEC network may be considered "long distance," or it may  
11          be considered "local" in nature. If considered "local," access charges *do not*  
12          apply and if traffic occurring on the LEC network is "long distance," intercarrier  
13          access charges *do* apply. Even if considered "local," there are instances where no  
14          inter-carrier compensation is due, and there are instances of where a "reciprocal  
15          compensation" form of inter-carrier compensation is due. The issue in this case  
16          involves wireless-originated traffic which is primarily "local" in nature, meaning  
17          that the inter-carrier form of compensation is reciprocal compensation, not  
18          exchange access.

19                     The differences in IXC and LEC traffic extend beyond the form of inter-  
20          carrier compensation. For example, IXC traffic terminates over Feature Group  
21          "A", "B", or "D" trunking arrangements. LEC traffic occurs over "common"  
22          trunks, customarily characterized as Feature Group "C" trunking arrangements.

1           The differences in IXC and LEC traffic do not conclude with trunking  
2           arrangements. In my view, the most significant difference between IXC traffic  
3           and LEC traffic is the inter-carrier billing relationship imposed on the terminating  
4           carrier. For IXC traffic, the terminating carrier simply bills the long distance  
5           carrier, including billing for wireless-originated traffic. Similarly, for any other  
6           traffic that is sent to the terminating carrier by the long distance carrier, the  
7           terminating carrier simply bills the long distance carrier for that traffic. For LEC  
8           traffic, a completely different billing relationship exists. For LEC traffic, the  
9           terminating carrier may not bill the "transiting" carrier. Instead, the terminating  
10          carrier must bill the carrier responsible for placing the call on the network. Such  
11          carriers are sometimes called the "originating" carrier.

12           From my perspective, the unique billing relationship for transiting traffic  
13          occurring on the LEC network represents a significant difference between that  
14          traffic and IXC traffic. Unlike IXC traffic, where the long distance carrier is  
15          responsible for all traffic (including all forms of third-party traffic, including  
16          wireless-originated traffic), transiting carriers are not responsible for any third-  
17          party traffic sent to terminating carriers (including wireless-originated traffic).  
18          For this reason, CPN should not be used to identify the responsible party for  
19          wireless originated traffic occurring on the LEC network.

20          **Q.     Do Category 11-01-XX billing records for IXC traffic contain the**  
21          **CPN for wireless-originated calls?**

22          A.     Yes. Industry Standard Category 11-01-XX billing records for IXC traffic  
23          do contain the "From Number" in bit positions 15 to 24 of the billing record. The

Rebuttal Testimony of  
William L. Voight

1 "From Number" is exactly the same as "CPN" for wireless-originated calls.  
2 Presence of wireless-originated CPN in billing records of IXC traffic is evident  
3 from the Schedules of both Mr. Schoonmaker and Mr. Read. The presence of a  
4 "From Number" in the billing records for wireless-originated calls is also self  
5 evident from depositions taken, and access tariffs referenced in, Case No. TT-  
6 2004-0542.<sup>1</sup>

7 **Q. Please explain the basis of your conclusion that Mr. Schoonmaker is**  
8 **primarily focusing on the Category 11 records created for IXC traffic.**

9 A. As I would understand his testimony, Mr. Schoonmaker's position relies  
10 on descriptions found in Schedules RCS-3 and RCS-4, and the belief that a "value  
11 of 8" in Indicator 9 (indicating cellular originated traffic) would lead to  
12 circumstances whereby a full and complete "From Number" should be applied in  
13 the Category 11-01-XX billing record. The examples shown in RCS-2 (page 3-  
14 296) pertain to access traffic, carried over Feature Group "A", "B", "C", and "D"  
15 trunking arrangements, as applied to message telephone service (MTS) (also  
16 known as "long distance" service).

17 Mr. Schoonmaker's examples do not acknowledge that the traffic  
18 recording at issue in this case is not access traffic; rather, the traffic at issue in this  
19 case is primarily subject to reciprocal compensation (with the sole exception of  
20 individually negotiated interMTA factors). Mr. Schoonmaker's testimony omits  
21 the fact that the traffic recording at issue in this case is not subject to an IXC  
22 billing relationship; rather, the traffic at issue in this case is subject to a LEC

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<sup>1</sup> RE: *In the Matter of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri's Proposed Revision to Its PSC Mo. No. 36 Access Service Tariff.*

Rebuttal Testimony of  
William L. Voight

1        billing relationship. Lastly, Mr. Schoonmaker's testimony omits any  
2        acknowledgement that the traffic recording at issue in this case is not "long  
3        distance;" rather, the traffic at issue in this case is primarily "local" in nature. For  
4        these reasons, I would respectfully disagree with Mr. Schoonmaker that RCS-2, 3,  
5        and 4 demonstrate a requirement that Category 11-01-XX billing records contain  
6        CPN for wireless-originated calls occurring over the LEC-to-LEC network.

7        **Q.     Please explain the basis for your conclusion that Mr. Read's testimony**  
8        **primarily focuses on the billing records created for LEC traffic.**

9        A.     Mr. Read states that CPN "has never been included in the industry  
10       standard Category 11-01-XX EMI billing record for wireless originated traffic"  
11       (page 10, line 5); and that CPN "was never part of AMA" and is "not available"  
12       for the creation of EMI records (page 10, line 9); and that CPN is not a required  
13       field in EMI category 11-01-XX records (page 20, line 21). Clearly, as reflected  
14       in his own Schedule 5, these statements by Mr. Read are not applicable to IXC  
15       carried Feature Group "A", "B", or "D" access recordings because the "From  
16       Number" appears in bit positions 15 to 24 of the Category 11-01-XX record for  
17       IXC access traffic. Such statements form the basis for my conclusion that Mr.  
18       Read's statements are applicable only as they pertain to wireless-originated traffic  
19       that traverses the LEC network.

20       **Q.     Does Mr. Constable's testimony provide clarification on the**  
21       **apparent disparity between the conclusions drawn by Mr. Schoonmaker and**  
22       **Mr. Read?**

Rebuttal Testimony of  
William L. Voight

1           A.     Yes, significant clarity can be found in Mr. Constable's testimony.  
2           In particular, beginning at line 6, on page 9, of Mr. Constable's Direct Testimony  
3           he describes how the switches of local exchange carriers use unique AMA  
4           (Automatic Message Accounting) standards for the different types of  
5           compensable calls occurring over the network. Mr. Constable describes the role  
6           of Telcordia in establishing the switch standards, and the role of the Ordering and  
7           Billing Forum ("OBF") in establishing the EMI standards. His testimony  
8           expresses the need for consistency among the two standards bodies. In doing so,  
9           Mr. Constable's testimony demonstrates how both Mr. Schoonmaker and Mr.  
10          Read can offer the same data, and seemingly reach different conclusions. One  
11          witness, Mr. Schoonmaker, observes the data from the general standpoint of  
12          wireless-originated access traffic, and questions why CPN is not similarly  
13          recorded for wireless-originated reciprocal compensation traffic. This  
14          observation is lacking because it focuses on EMI standards for wireless-originated  
15          access traffic on the one hand, while ignoring AMA switch recordings for  
16          wireless-originated LEC traffic on the other hand. The other witness, Mr. Read,  
17          observes the data from the general standpoint of wireless-originated reciprocal  
18          compensation traffic, and questions the need for CPN to be recorded in that  
19          environment, even though wireless CPN is recorded for IXC access traffic. This  
20          observation is lacking because it focuses on both AMA and EMI recordings for  
21          wireless-originated LEC traffic on the one hand, while ignoring AMA and EMI  
22          recordings for wireless-originated IXC traffic on the other hand. In my view, the  
23          testimony of each witnesses somewhat neglects to give a complete picture of the

1 unique manner in which the Telcordia and OBF documents are used for proper  
2 Category 11-01-XX record creation. Mr. Constable's testimony describes the  
3 importance of applying each set of standards to the process.

4 **Q. Would it have been helpful if in their testimony Messrs.**  
5 **Schoonmaker, Read, and Constable would have been more specific in**  
6 **referring to either "IXC" traffic or "LEC" traffic?**

7 **A.** Yes, in my opinion it would have. As previously stated, 4 CSR  
8 240-29.010 (15) and (19) place a distinct difference between the two traffic types.  
9 The distinction is absolutely necessary and, in my view, there is a strong  
10 likelihood for confusion if the distinctions are not maintained.

11 **Q. Mr. Constable makes statements such as: "[T]hose [AMA and**  
12 **Telcordia] standards also do not require the inclusion of CPN in the AMA**  
13 **recordings for wireless-originated calls." What is your response?**

14 **A.** As demonstrated in Case No. TT-2004-0542, such is clearly not  
15 the case for the IXC access traffic occurring over Feature Group trunks. Mr.  
16 Constable was a participant in Case No. TT-2004-0542 and I would caution  
17 against taking any single statement of his testimony outside the complete text.

18 **Q. Does this conclude your Rebuttal Testimony?**

19 **A.** Yes, it does.