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Case No.: *TO-2006-0299*
Date Testimony Prepared:
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DIRECT TESTIMONY

OF

CARLA WILKES

ON BEHALF OF
CENTURYTEL OF MISSOURI, LLC AND SPECTRA COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL

CASE NO. TO-2006-0299

NP

OF THE STATE OF MISSOURI

PETITION OF SOCKET TELECOM, LLC FOR COMPULSORY ARBITRATION OF INTERCONNECTION AGREEMENTS WITH CENTURYTEL OF MISSOURI, LLC AND SPECTRA COMMUNICATIONS, LLC PURSUANT TO SECTION 252(b)(1) OF THE TELECOMMUNICATIONS ACT OF 1996	)))))))	**CASE NO. TO-2006-0299**

STATE OF LOUISIANA

PARISH OF OUACHITA

AFFIDAVIT OF CARLA FUTCH WILKES

I, Carla Futch Wilkes, of lawful age and being duly sworn, state:

1. My name is Carla Futch Wilkes. I am presently Director IS Program Office & Customer Systems for CenturyTel Service Group, LLC.

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.

Carla Futch Wilkes

Subscribed and sworn to before this 20th day of March, 2006.

Notary Public

My Commission expires: At Death

Gary Maxwell Cox
Louisiana Bar Roll No. 27419
Notary Public, Ouachita Parish, Louisiana
My Commission is for Life

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DIRECT TESTIMONY OF CARLA WILKES

ON BEHALF OF CENTURYTEL OF MISSOURI, LLC AND SPECTRA COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Carla Wilkes. My business address is 100 CenturyTel Drive, Monroe, Louisiana 71203

Q. ON WHOSE BEHALF ARE YOU SUBMITTING DIRECT TESTIMONY?

A. I am submitting direct testimony on behalf of CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, collectively referred to herein as "CenturyTel."

I. BACKGROUND

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

A. I am employed by CenturyTel Service Group, LLC as Director of Information Systems Program Office and Customer Systems.

Q. WHAT ARE YOUR RESPONSIBILITIES?

A. As Director of Information Systems Program Office and Customer Systems, I am responsible to provide internal direction, leadership and accountability for mission critical IT project management efforts. Also, to augment the development and maintenance of application systems by developing working relationships with CenturyTel's business units in order to understand their needs and coordinate and track their IT projects and services.

Q. PLEASE SUMMARIZE YOUR WORK EXPERIENCE?

A. Overall, I have over 21 years of experience in the telecommunications industry with CenturyTel in various positions including Director of Information Systems Program

Office and Customer Care, Manager – Information Systems Program Office, Manager – Customer Care Online Applications, Manager – Carrier Access Billing Applications, Senior Programmer Analyst and Programmer Analyst. Please *see* Wilkes Schedule No. 1, which is a summary of my experience and background

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I earned a Bachelors of Business Administration in Computer Information Systems in 1984 from Northeast Louisiana University (presently referred to as University of Louisiana at Monroe).

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. In my testimony, I will support the testimony of Ms. Maxine Moreau, which in part addresses disputed issues pertaining to Operations Support Systems ("OSS") (Article XIII of the proposed interconnection agreement). My testimony focuses on the modifications to CenturyTel's current OSS required to achieve Socket's Article XIII demands and explains how much the OSS-related systems modifications and operational changes would be expected to cost.

III. OSS MODIFICATIONS REQUIRED UNDER ARTICLE XIII

A. SOCKET'S ARTICLE XIII AND ITS IMPACT ON CENTURYTEL

Q. WHAT DOES SOCKET DEMAND THROUGH ITS PROPOSED ARTICLE XIII?

A. Socket demands a "Real Time Electronic Interface (EI) for transferring and receiving orders, FOCs, Order Completions, and other provisioning data and materials (e.g., access to Street Address Guide (SAG) and Telephone Number Assignment Data Base) as well as other functions necessary for Socket to operate at Parity with the retail operations of CenturyTel and its affiliates." Socket's Proposed Article XIII, Access to Operations

Support Systems (OSS) at §3.2. Socket demands that, to the extent that this system is not already in existence, CenturyTel must implement it "for Socket's use within nine months of the effective date of the agreement." *Id.* at §3.3. Socket also proposes that as CenturyTel thereafter introduces new interfaces, they would be automatically made available to Socket. *Id.* at §3.3. Everything else in Article XIII relates to these demands, their development, or their implementation.

Perhaps more importantly, Article XIII is substantially the same as Attachment XIV to the recently adopted AT&T Missouri (then SBC Missouri) generic interconnection agreement. In sum, Socket demands of CenturyTel what this Commission required of AT&T Missouri.

Q. WHY IS THIS DEMAND INAPPROPRIATE?

A. CenturyTel is not AT&T Missouri. While it is true that both companies are incumbent local exchange carriers ("incumbent LECs"), as Mr. Avera describes in his testimony, CenturyTel is a far smaller, far more rural, and far more dispersed company than AT&T Missouri. Moreover, as Mr. Avera explains, these attributes of CenturyTel's business make Socket's proposal to burden it with AT&T Missouri-like requirements, despite CenturyTel's history of performance and lack of scale, particularly onerous and inappropriate.

Although Socket is unlikely to highlight the fact, it is clear that Socket's proposal presents the prospect that CenturyTel will be burdened with an unprecedented systems development project. This project, I explain below, is a high risk development and integration project for CenturyTel because of the need for multiple parties to make high

impact changes to at least five of CenturyTel's existing systems, to develop a complex certification process, and to maintain coordination of efforts with multiple business units.

In addition, as Ms. Moreau explains, Socket's historical order and customer volumes are very low in comparison to the volumes that could conceivably justify the imposition of the kind of cost and other burdens that the imposition of Article XIII would place upon CenturyTel.

Importantly, Socket can show no harm from a continuation of the existing systems, particularly for the order volumes it has demonstrated it will provide. (While we have asked Socket to provide information relating to its future demand for interconnection services—the kind of information that conceptually could support a request for this kind of burden—Socket has said that it either has no such information or will not produce it. Our counsel are currently attempting to obtain this information, but in its absence, there is nothing on which Socket may base a case that it is not being provided access to pre-ordering, ordering, provisioning, maintenance, repair, or billing information or processes that inhibits its business or relationship to its customers in any way.) This is true because CenturyTel's systems provide Socket with service at parity with the service CenturyTel provides itself, even though the methods of access may be different. Ms. Moreau and Ms. Hankins provide more detail on this point.

Q. WHAT TIMEFRAME DOES SOCKET SUGGEST FOR IMPLEMENTATION OF THEIR PROPOSED ARTICLE XIII DEMANDS?

A. Socket has demanded CenturyTel implement a Real Time Electronic Interface for Socket's use within nine (9) months of the effective date of a new interconnection agreement. In addition, Socket has demanded that prior to live access to the new OSS,

CenturyTel and Socket would perform Operational Readiness Testing (ORT) beginning no later than three (3) months after the effective date of the interconnection agreement.

Q. IS THAT REASONABLE?

A. No.

Q. HOW LONG WOULD IT TAKE TO IMPLEMENT SOCKET'S PROPOSED ARTICLE XIII DEMANDS?

A. Based on my extensive experience with managing IT projects, I estimate that it would take a minimum of 24 months to implement all of the functionalities required under Socket's proposed Article XIII.

Q. WHAT WOULD THE FULL IMPLEMENTATION OF SOCKET'S PROPOSED ARTICLE XIII COST CENTURYTEL, AND ULTIMATELY, THE USERS OF THE NEW INTERFACES?

A. I estimate the cost of development and deployment to exceed *_____* I have attached as Wilkes Schedule No. 1 a detailed summary of the cost components making up the total. The financial figures that are followed by "superscript" numbers are referenced in Wilkes Schedule No. 1.

Q. WHAT IS INCLUDED IN THE COST ESTIMATE?

A. The *_____* estimate includes:

- Software development life cycle for pre-ordering, ordering, maintenance/repair, and billing interfaces as described later in this testimony.
- A stand-alone testing environment with production-like hardware and software components necessary to permit CLECs access to the automated OSS for operational readiness testing for all phases of implementation.

- Data connection and security validation as described in Article XIII.
- Implementation and support of quarterly LSOG releases.
- Personnel to support project management, change management, release management, testing coordination efforts, as well as ongoing support functions for trouble ticket resolution.

This estimate does not include a return on investment, overhead expense or taxes.

B. REQUIREMENTS, FEATURES, AND FUNCTIONS OF AN OSS AS SOCKET HAS DEMANDED

1. PREORDERING FUNCTIONS

Q. WHAT CHANGES DOES SOCKET REQUIRE IN THE PREORDERING PROCESS IN ARTICLE XIII?

A. The pre-ordering functionality of an automated OSS such as Socket has demanded would include:

- Access to information regarding feature and service availability by working telephone number(s) and NPA/NXX, along with IntraLATA and InterLATA PIC options (as Socket demands in Article XIII, § 4.2.1.).
- Access to CenturyTel's retail or resold account information, including CPNI, billing name and address, service address, service and feature subscription, directory listing information, and long distance carrier identity (as Socket demands in Article XIII, § 4.2.2), as well as access to address validation inquiry (as Socket demands Section 4.2.5).

Q. WHAT TASKS WOULD CENTURYTEL BE REQUIRED TO UNDERTAKE TO DEVELOP THE DEMANDED PREORDERING FUNCTIONALITY?

A. To provide the pre-ordering functionality Socket demands, CenturyTel would be required to develop a "graphical user interface" ("GUI") and "application program interfaces" ("APIs") to CenturyTel's transactional systems for real time information. A "GUI" is a computer terminal interface, such as Windows®, that is based on graphics (such as Windows® icons), instead of text. An API is a set of routines, protocols, and tools for building software applications. A good API makes it easier for a programmer to develop a program by providing all the building blocks. A programmer puts the blocks together. This is an extremely labor-intensive activity and will take months to develop.

Q. ARE THERE FUNCTIONS DEMANDED UNDER THE PROPOSED ARTICLE XIII THAT SIMPLY CANNOT BE PROVIDED?

A. Yes. Article XIII includes a demand for information such as telephone number reservation and cancel reservation (*see* Section 4.2.3) and actual due date inquiry and dispatch inquiry (*see* Section 4.2.4). However, this information is not available to CenturyTel until an order is created, and CenturyTel could not provide it to Socket regardless of the nature of the interface. At the same time, CenturyTel could provide Socket with information regarding the standard due date for the services Socket proposed to order.

Q. ARE THERE OTHERS?

A. Yes. Socket has demanded that the electronic pre-ordering functionality include xDSL loop prequalification and qualification information (as defined in Section 4.3.1) and connecting facility assignment inquiry (as set out in Section 4.3.3). However,

CenturyTel's records pertaining to facilities are not generally contained in an electronic database, and CenturyTel has no computerized information that would permit an automated search for loop lengths or other facilities information. These types of inquiries require manual intervention both for CenturyTel and for requesting carriers.

Q. ARE THERE OTHER PREORDER FUNCTIONALITIES THAT SOCKET CAN EASILY PROVIDE TO ITSELF?

A. Yes. Common Language Location Indicator ("CLLI") inquiry information (Section 4.3.2) can be obtained from the LERG. In addition, Network Channel/Network Channel Interface (NC/NCI) inquiry information (Section 4.3.4) may be obtained from Telcordia.

Q. ARE THERE "DATA VALIDATION FILES" THAT CENTURYTEL CAN PROVIDE TO SOCKET?

A. Yes. CenturyTel can provide certain data validation files, as requested in Section 4.5.2, including the street access guide ("SAG"), features and services available by switch, directory names, class of service codes, community names, yellow page headings, and PIC/LPIC.

Q. WHAT CHANGES IN CURRENT PROCESSES WOULD IMPLEMENTING THE PRE-ORDERING ELECTRONIC OSS FACILITATE?

A. The pre-ordering OSS would enable Socket to sign onto a website and enter an address, WTN or NPA/NXX and retrieve the requested information instantaneously as opposed to signing onto CenturyTel's current website and entering a request for a CenturyTel representative to provide this information.

Q ARE THERE ANY CUSTOMER-IMPACTING CONSEQUENCES ASSOCIATED WITH "INSTANTANEOUS ACCESS"?

A Yes, as Ms. Moreau discusses, unfettered access to the raw data implicates customer information policies, such as concerns about access to customer proprietary network information ("CPNI"). The Commission should not permit that kind of access without the safeguards that the FCC's rules require.

Q. WHAT IS THE ESTIMATED COST TO IMPLEMENT THE PRE-ORDERING ELECTRONIC OSS IMPROVEMENTS SOCKET HAS DEMANDED?

A. The cost of implementing the pre-ordering system described in Article XIII is estimated at *_____*.[1] In addition, these systems will require ongoing annual maintenance and support at an estimated cost of nearly *_____*.[2]

Q. DOES CENTURYTEL ESTIMATE THAT IF REQUIRED TO IMPLEMENT AN ELECTRONIC PRE-ORDERING INTERFACE THAT IT WOULD RECOGNIZE ANY REDUCTION IN COSTS?

A. Yes, CenturyTel would recognize a fairly modest reduction in costs that offsets partially the ongoing annual maintenance and support cost of the system.

CenturyTel saves nothing in ongoing costs for implementing the pre-ordering system for Socket alone, because Socket's order volume is extremely low. Over the past year, CenturyTel has received an average *_____* orders per month from Socket.

In theory, there would be very small offsetting cost savings if all Missouri CLECs adopt the electronic system. CenturyTel estimates that it could save the cost of as little as 0.5 (1/2) of a "full time employee" ("FTE") for Missouri. If the system was rolled out nationally, and all CLECs took advantage of it, the estimate of savings would still only amount to 1.5 FTEs. CenturyTel theoretically could save only *_____*, per year in

Missouri and up to *_____* nationally for all CLECs. This is a very minor offset to the overall costs and even the ongoing costs. These savings are included in the calculation of the additional ongoing annual maintenance and support stated above.

2. ORDERING AND PROVISIONING FUNCTIONS

Q. WHAT CHANGES DOES SOCKET REQUIRE IN THE ORDERING AND PROVISIONING PROCESSES IN ARTICLE XIII?

A. The ordering and provisioning processes vary by type of order—"Local Service Requests" ("LSRs") have one process, and "Access Service Requests" ("ASRs") have another. Socket demands changes in both processes.

Q. WHAT CHANGES DOES SOCKET REQUIRE IN THE LSR ORDERING AND PROVISIONING PROCESSES?

A. Socket requires that CenturyTel, at a minimum, maintain its current electronic interface and make additions as specified in Article XIII, including expanding the application to include the following:

- Order all UNEs and combination of UNEs.
- Receive electronic notifications.
- Provide electronic access to order status and provisioning status.
- Retrieve previously submitted orders with previously populated fields still populated with data input by Socket.

Q. HOW DOES CENTURYTEL PROPOSE TO FACILITATE THIS REQUIREMENT?

A. CenturyTel would deploy an LSR "receive gateway," that would interface with CenturyTel's transactional systems. This would require that CenturyTel purchase and implement the software and hardware for a front-end, GUI-based application system and

develop "APIs" to interface with CenturyTel's transactional systems. CenturyTel would also make extensive changes to its transactional systems to store and process the pertinent LSR information, provide electronic access to order and provisioning status and generate the appropriate notifications.

Q. HOW WOULD A "RECEIVE GATEWAY" WORK FOR LSRS?

A. A "receive gateway" would allow automated acceptance of Local Service Ordering Guidelines ("LSOG") compliant orders, including appropriate descriptions of features, services and elements to be provisioned by CenturyTel. If Socket's demand were fulfilled, these LSRs would be edited against LSOG rules. These rules are provided and supported by "ATIS" (Alliance for Telecommunications Industry Solutions) and are the industry standard for ordering advanced services. Upon completion and validation of the order in the proposed new system, the LSR would be transmitted to CenturyTel's gateway. These orders would utilize APIs to create an order in CenturyTel's end user transactional systems. Information would be passed back to the front-end system via the gateway in order to create a "firm order confirmation" or "commitment" (or "FOC"), or "jeopardy notice" to be sent back to Socket.

Q. HOW IS AN LSR HANDLED AFTER THE IMPLEMENTATION OF A "RECEIVE GATEWAY"?

A. Essentially, the order would be worked the same as an order would be worked without such an interface. For orders requesting service less than a T1, if there are "in-place" facilities and the workforce is available, the order could be worked the same day. Or if the customer requested a "desired due date" (or "DDD"), the order would flow through and provision automatically based on the date given. If facility work or engineering work

were required, the order would be sent to CenturyTel's Assignment Department. Assignment would review the order and determine if they could work the order or if they needed to send it to CenturyTel's Engineering Department to be worked. If Assignment could work the order they would do so, then update the order with a status indicating they completed their work. If the due date of the order is the same day it is worked, a notice would be sent back via the gateway showing a completed status for current due date and a notice of "service order completion ("SOC") would be generated. If the due date is in the future, a notice would be sent back via the gateway indicating a provisioned status for the order, and an email would be generated to Socket notifying them of the status change. If Assignment could not work the order, they would update the order and send the order back to Customer Service stating that it could not be worked. The order would then be sent back via the APIs to the gateway with a jeopardy status. Customer Service would then contact Socket for further information or would contact another department in CenturyTel for the help needed. Under Socket's proposed OSS, order status would be updated throughout the order lifecycle and notification sent to Socket (*see* Section 5.4.2). For orders requesting service of a T1 or greater or ISDN, a queue would be monitored in the end-user transactional system. When an order appeared, a manually generated internal ASR would be forwarded to CenturyTel's Access Ordering and Design Center ("AODC") department for provisioning. The "AODC" would then follow their standard processing for ASRs. Under Socket's proposed OSS solution, as the order is updated in Ensemble order status would be sent back to the GUI via the APIs and gateway (*see* Section 5.4.2).

Q. DOES THE PROPOSED LSR APPLICATION PROVIDE ANY ADDITIONAL FUNCTIONS FOR ORDERING?

A. Yes. The application would provide more automated notifications, real-time electronic access to order and provisioning status and more flexibility in updating previously submitted orders (as requested in Section 5.4.3) than is allowed in the current website.

Q. DOES THE PROPOSED LSR APPLICATION PROVIDE A POST-TO-BILL NOTIFICATION?

A. No. For local orders that are billed from CenturyTel's end-user billing system, the completed date of the order is the post-to-bill date (as requested in Section 5.4.1).

Q. DOES THE PROPOSED LSR APPLICATION REQUIRE ANY ADDITIONAL IT SUPPORT?

A. Yes. If implemented, CenturyTel would support application development, testing, and coordination of quarterly LSOG updates. CenturyTel would also provide adequate testing to ensure that changes made to their transactional systems would not negatively impact the LSR gateway or APIs.

Q. WHAT WOULD THE PROPOSED LSR ORDERING AND PROVISIONING APPLICATION COST?

A. CenturyTel has estimated the implementation of the ordering and provisioning system that I have described would cost over *_____*,[3] excluding taxes, return on investment, and overheads. It would also require ongoing maintenance and support at an estimated annual cost of over *_____*.[4]

Q. WHAT IS THE ORDER VOLUME THAT SOCKET USES TO JUSTIFY THE IMPOSITION OF THIS KIND OF EXPENSE?

A. Over the past year, CenturyTel has received an average of *_____* orders per month from Socket.

Q. DOES CENTURYTEL ESTIMATE THAT IF REQUIRED TO IMPLEMENT IMPROVEMENTS FOR LSRS THAT IT WOULD RECOGNIZE ANY REDUCTION IN COSTS?

A. Yes, again CenturyTel would recognize a slight reduction in costs that offsets partially the ongoing annual maintenance and support cost of the system. Specifically, CenturyTel would not realize a savings for implementing the LSR automation to accommodate for Socket because its order volume is extremely low. Relatively small costs could be saved, however, if all Missouri CLECs or all CLECs using CenturyTel LSRs adopt the proposed new system. If widely adopted by CLECs in Missouri, CenturyTel could save the cost of 1.7 FTEs; if widely adopted across CenturyTel's service territories nationwide, the savings could reach the cost of eight (8) FTEs.

CenturyTel's savings each year would potentially be *_____* for Missouri and *_____* for all CLECs nationwide. These savings are included in the calculation of the additional ongoing annual maintenance and support stated above.

Q. WHAT DOES THE PROCESS SOCKET DESIRES REQUIRE IN THE ASR ORDERING AND PROVISIONING PROCESSES?

A. First, CenturyTel and Socket use exactly the same processes for ASRs. CenturyTel faxes or emails ASRs to itself, just as Socket does. Despite having the same process as CenturyTel, Socket demands in Article XIII, that CenturyTel automate the ASR process.

CenturyTel's transactional systems that support ASR's do not automatically interface today.

Q. HOW WOULD THE PROPOSED ASR APPLICATION BE BUILT?

A. If CenturyTel is required to implement automated OSS for ASRs, CenturyTel would have to purchase software and hardware for a GUI order entry application from a third party vendor.

Q. HOW WOULD THE PROPOSED ASR APPLICATION BE USED?

A. If the application is implemented, Socket would be asked to enter orders into CenturyTel's ASR gateway via a web portal. These ASR's would be edited against all Access Service Ordering Guidelines ("ASOG") rules. These rules are provided and supported by ATIS and are the industry standard for ordering advanced services. Upon completion and validation of the order, the ASR would be transmitted to CenturyTel's receive gateway throughout the day. Members of the Access Ordering and Design Center ("AODC") would monitor the list of ASRs submitted and distribute these orders for work. CenturyTel would then work and update the ASR's in the new system. The new system would provide automated FOCs and SOCs as the system was updated.

However, the implementation of this system would not improve Socket's service relative to that which CenturyTel provides its own customers because Socket and CenturyTel already access the same systems and process their orders in the same ways. Furthermore, the implementation of this system would not improve Socket's service relative to that which it receives today. Although the orders would be entered into the GUI, CenturyTel would monitor and process the orders manually just like they do today.

Q. HOW MUCH WOULD THE PROPOSED ASR APPLICATION COST TO DEPLOY?

A. The ASR ordering system described is estimated to cost over *_____*[5] to deploy, excluding taxes, return on investment, and overheads, with ongoing annual maintenance and support cost of over *_____*.[6]

Q. WHAT IS THE ORDER VOLUME THAT SOCKET USES TO JUSTIFY THE IMPOSITION OF THIS KIND OF EXPENSE?

A. Over the past year, CenturyTel has received an average of *_____* per month from Socket. CenturyTel would achieve no savings by implementing the ASR automation for Socket because its order volume is extremely low.

3. LOSS NOTIFICATION

Q. WHAT HAS SOCKET DEMANDED IN ARTICLE XIII WITH RESPECT TO "LOSS NOTIFICATION"?

A. In Article XIII, Socket demands that a "loss notification" be provided automatically. A "loss notification" would arise when one telecommunications provider makes a request that is completed and results in another provider being affected by the change. Ordinarily, loss notifications are associated with a given telephone number.

Q. IS THIS CHANGE REQUIRED OR EVEN USEFUL?

A. No. CenturyTel provides these notifications today. Socket can demonstrate no need for an expensive OSS to perform a function that is reliably performed today.

4. MAINTENANCE AND REPAIR

Q. WHAT HAS SOCKET DEMANDED IN ARTICLE XIII WITH RESPECT TO MAINTENANCE AND REPAIR?

A. In Article XIII, Socket demands a GUI interface for reporting and verifying status on trouble tickets for resale services, UNEs, and interconnection facilities and trunks. In order to comply with Socket's request, CenturyTel would purchase the software and hardware required to implement a front-end, GUI-based application system and develop APIs to interface with CenturyTel's transactional systems.

Q. IS THIS CHANGE REQUIRED?

A. No. CenturyTel already provides exactly the same service to Socket that it provides to itself.

Q. HOW MUCH WOULD THE PROPOSED APPLICATION COST TO DEPLOY?

A. The cost of implementing the proposed maintenance and repair system described is estimated at nearly *_____*,[7] excluding taxes, return on investment, and overheads, with an ongoing annual maintenance and support cost of nearly *_____*.[8]

Q. CAN SOCKET JUSTIFY THE IMPOSITION OF THIS KIND OF EXPENSE?

A. No. Currently Socket has only *__* active DS1 loop customers. Even if CenturyTel received one trouble ticket for every Socket DS1 loop per month, it would only total *__* trouble tickets per month.

Q. DOES CENTURYTEL ESTIMATE THAT IF REQUIRED TO IMPLEMENT THIS SYSTEM THAT IT WOULD RECOGNIZE ANY REDUCTION IN COSTS?

A. Yes, again CenturyTel would recognize a miniscule reduction in costs that offsets partially the ongoing annual maintenance and support cost of the system. Specifically, CenturyTel's savings for implementing the maintenance and repair system would be the

value of the time to take the call. The average time for a trouble call is *_____*. If CenturyTel received one trouble ticket for every Socket DS1 loop each month at *_____* per call, CenturyTel's savings each month would be only amount to *_____*.

5. BILLING MEDIA/INTERFACE

Q. WHAT HAS SOCKET DEMANDED IN ARTICLE XIII WITH RESPECT TO BILLING MEDIA/INTERFACE?

A. In Article XIII, section 7.0, Socket demands that CenturyTel provide billing information in both a paper format and an electronic bill format (see Section 7.2.1). For resale services, Socket demands viewing billing information via a real time interfaces (see Section 7.2.2). Socket also demands an electronic Daily Usage Extract (as described in Section 7.2.3).

Q. CAN CENTURYTEL PROVIDE FOR SOCKETS DEMAND WITH RESPECT TO BILLING MEDIA/INTERFACE?

A. Yes. Socket may receive, upon request, an industry standard 811 electronic bill format. Socket can view its bill via MyAccount, as do other CenturyTel customers. Socket can receive, upon request, a daily usage extract or a bill data tape.

Q. ARE THERE ANY OF THE BILLING MEDIA/INTERFACES THAT CENTURYTEL CAN NOT PROVIDE?

A. Yes. CenturyTel does not provide real time billing information such as Socket demands in Section 7.2.2. At the same time, this information is not provided internally to CenturyTel.

6. RECURRING COSTS

Q. WHAT CATEGORIES OF RECURRING COST ARE ASSOCIATED WITH THE SYSTEMS THAT SOCKET HAS DEMANDED?

A. Recurring costs associated with Socket's demands fall into the following categories:

- Development, testing and implementation of quarterly maintenance releases for ASOG and LSOG.
- Development and testing of the front-end systems and "APIs" due to changes/updates to CenturyTel's transactional systems.
- Software and hardware maintenance costs.
- Ongoing support for OSS trouble tickets.
- Coordination, testing and scheduling efforts for CLECs.
- Training documentation development.
- Project management for all of the above.

7. MISCELLANEOUS DEMANDS

Q. HAS SOCKET MADE ANY OTHER DEMANDS IN ARTICLE XIII?

A. Yes. In Section 3.7 of Article XIII, Socket has demanded that CenturyTel establish and maintain an Information Services Call Center ("ISCC") that provides for technical support function of OSS interfaces. Socket would receive a contact number for

CenturyTel's Information Services help desk. The help desk would log a "ticket" and contact the appropriate CenturyTel Information Systems support personnel. The existing help desk is staffed from 6:00 a.m. CST to 8:00 p.m. CST. After hours, there are instructions on how to contact the appropriate personnel. If these systems were implemented into production, CenturyTel Information Systems would respond to technical issues within CenturyTel's current production timeframes. This is exactly how CenturyTel Information Systems works today.

III. CONCLUSION

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does. I reserve the right to supplement in the event that discovery or negotiations make me aware of additional information that would affect the subject matter of this testimony.

Wilkes Schedule – No. 1

IS DEEMED PROPRIETARY IN ITS ENTIRETY