

Exhibit No.:
Issue: *Provision of CPN in
wireless records*
Witness: *Robert C.
Schoonmaker*
Type of Exhibit: *Direct Testimony*
Sponsoring Parties: *Small Telephone
Company Group;
Missouri Independent
Telephone Group*
Case No.: *TE-2006-0053*
Date: *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. for a Waiver,) Case No. TE-2006-0053
Of Certain Requirements of 4 CSR 240-29.040(4))

AFFIDAVIT OF ROBERT C. SCHOONMAKER

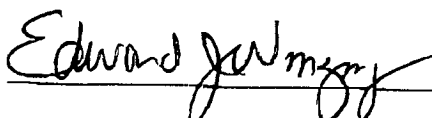
Robert C. Schoonmaker, of lawful age, being duly sworn, deposes and states as follows:

1. My name is Robert C. Schoonmaker. I am employed by GVNW Consulting, Inc. as President and Chief Executive Officer.
2. Attached hereto and made a part hereof for all purposes is my direct testimony with accompanying schedules.
3. I hereby 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 and that the information contained in the attached schedules is also true and correct to the best of my knowledge and belief.



Robert C. Schoonmaker

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

 Notary Public

My Commission expires: 1-3-09

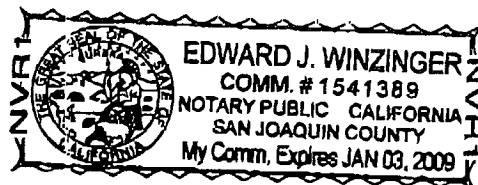


TABLE OF CONTENTS

BACKGROUND OF WITNESS	2
HISTORY REGARDING RECORDS IN MISSOURI	6
PROVISIONS OF THE COMMISSION'S RULE	10

1
2
3
4 **DIRECT TESTIMONY OF ROBERT C. SCHOONMAKER**
5

6
7 **BACKGROUND OF WITNESS**
8

9 Q. Please state your name and address.

10 A. My name is Robert C. Schoonmaker. My business address is 2270 La Montana
11 Way, Colorado Springs, Colorado 80918.
12

13 Q. By whom are you employed and in what capacity?

14 A. I am President and CEO of GVNW Consulting, Inc., a consulting firm
15 specializing in working with small telephone companies.
16

17 Q. Would you please outline your educational background and business experience?

18 A. I obtained my Masters of Accountancy degree from Brigham Young University in
19 1973 and joined GTE Corporation in June of that year. After serving in several
20 positions in the revenue and accounting areas of GTE Service Corporation and
21 General Telephone Company of Illinois, I was appointed Director of Revenue and
22 Earnings of General Telephone Company of Illinois in May, 1977 and continued
23 in that position until March, 1981. In September, 1980, I also assumed the same
24 responsibilities for General Telephone Company of Wisconsin. In March, 1981, I
25 was appointed Director of General Telephone Company of Michigan and in
26 August, 1981 was elected Controller of that company and General Telephone
27 Company of Indiana, Inc. In May, 1982, I was elected Vice President-Revenue

1 Requirements of General Telephone Company of the Midwest. In July, 1984, I
2 assumed the position of Regional Manager of GVNW Inc./Management (the
3 predecessor company to GVNW Consulting, Inc.) and was later promoted to the
4 position of Vice President. I served in that position until October 1, 2003 except
5 for the period between December 1988 and November, 1989 when I left GVNW
6 to serve as Vice President-Finance of Fidelity and Bourbeuse Telephone
7 Companies. I was elected to the position of President and Chief Executive
8 Officer effective October 1, 2003. In summary, I have had over 30 years of
9 experience in the telecommunications industry working with incumbent local
10 exchange carrier companies.

11
12 Q. What are your responsibilities in your present position?

13 A. In my current position I have overall responsibility for the management and
14 direction of GVNW Consulting, Inc. In addition, I consult with independent
15 telephone companies and provide financial analysis and management advice in
16 areas of concern to these companies. Specific activities which I perform for client
17 companies include regulatory analysis, consultation on regulatory policy,
18 financial analysis, business planning, rate design and tariff matters,
19 interconnection agreement analysis, and general management consulting.

20
21 Q. Have you previously testified in regulatory proceedings?

22 A. Yes. I have submitted testimony and/or testified on regulatory policy, local
23 competition, rate design, accounting, compensation, tariff, rate of return,

1 interconnection agreements, and separations related issues before the Illinois
2 Commerce Commission, the Public Service Commission of Wisconsin, the
3 Michigan Public Service Commission, the Iowa Utilities Board, the Tennessee
4 Public Service Commission, the New Mexico Public Regulation Commission, the
5 Public Utilities Commission of the state of South Dakota, the Public Service
6 Commission of West Virginia, the Public Utility Commission of Texas, and the
7 Missouri Public Service Commission. In addition, I have filed written comments
8 on behalf of our firm on a number of issues with the Federal Communications
9 Commission and have testified before the Federal-State Joint Board in CC Docket
10 #96-45 on Universal Service issues.

11
12 Q. On whose behalf are you testifying in this case?

13 A. I am testifying on behalf of the Small Telephone Company Group ("STCG") and
14 the Missouri Independent Telephone Group ("MITG"). The individual companies
15 in these two groups are contained in Schedule RCS-1 attached to my testimony.

16
17 Q. What is the purpose of your testimony?

18 A. I will provide some of the history related to the provision of records from tandem
19 companies such as AT&T Missouri to the small Missouri companies over the
20 years. I will further review the provisions of the Commission's enhanced network
21 rule related to the provision of that information in the records provided by AT&T
22 Missouri.

1 **HISTORY REGARDING RECORDS IN MISSOURI**

2

3 Q. Has the issue of the correct records and record types to be provided by tandem
4 companies to the small Missouri ILECs been an issue in prior proceedings before
5 this Commission?

6 A. That issue has been raised in a number of proceedings before the Commission
7 over the past ten years.

8

9 Q. When did the Commission first address, to your knowledge, the question of
10 records to be provided in regard to terminating wireless traffic?

11 A. I recall that issue being addressed in Case No. TT-97-524 which involved
12 proposed revisions to the Southwestern Bell Telephone Company (SWBT) tariff
13 for terminating wireless calls so SWBT would only provide a transiting function
14 for wireless carriers rather than their prior responsibility for terminating calls.
15 One of the issues raised in that case was the lack of appropriate records for the
16 small Missouri ILECs to be able to bill for such wireless calls. In its order in that
17 case the Commission required SWBT to provide Cellular Terminating Service
18 Usage Reports (CTUSR), but did not require more detailed individual call
19 records. The Commission stated, "The Commission has also found that SWBT
20 should be required to make available a Cellular Usage Summary Report that
21 contains information sufficient to allow third-party LECs to bill wireless carriers

1 for wireless-originating traffic which terminates in the exchanges of the third-
2 party LECs.”¹

3
4 Q. What was the next proceeding where the issue of appropriate records and record
5 types was brought before the Commission?

6 A. To the best of my recollection, this issue was brought before the Commission in
7 Case No. TO-99-254, a case that dealt with the termination of the Primary Toll
8 Carrier (PTC) plan which had been in existence for nearly ten (10) years and the
9 implementation of intraLATA dialing parity.

10
11 Q. What was the nature of the issue in that case?

12 A. As part of the termination of the PTC plan, it was proposed that the small
13 Missouri companies begin billing for terminating traffic using actual records of
14 terminating calls, rather than continuing to use a ratio of terminating calls to
15 originating calls that had been in use during the PTC plan. One question that
16 arose in this regard was whether SWBT should be required to provide industry
17 standard Category 11-01 records, or whether they could provide records in a non-
18 industry standard format which the Primary Toll Carriers had been using among
19 themselves.

20
21 Q. What was the Commission’s decision in regard to this issue?

22 A. In its June 10, 1999 order in Case No. TO-99-254, the Commission found that,

¹ *In the Matter of Southwestern Bell Telephone Company’s Tariff Filing to Revise its Wireless Carrier Interconnection Service Tariff*, P.S.C. Mo. – No. 40., 7 Mo. P.S.C. 3d 38, 53 (December 23, 1997).

1 the Commission will order the provision of standard "Category 11"
2 records. This will provide the SCs [secondary carriers] better
3 information about calls terminated to them. This will provide the
4 SCs better information about calls terminated to them. Any
5 additional expense this will cause the PTCs is dwarfed by the
6 elimination of the revenue losses they assert they are suffering
7 under the PTC plan.²
8

9 In this case the Commission clearly established a requirement that Category 11-01
10 records be provided to the small Missouri ILECs for intraLATA toll traffic after
11 April 1, 2000. As can be seen from the order, the Commission declined to give
12 SWBT any compensation for the costs of establishing these records because they
13 were anticipated to receive a substantial revenue increase and/or expense
14 reduction as a result of terminating the PTC plan.
15

16 Q. Could you briefly explain what a "Category 11-01" record is?

17 A. Yes. For many years members of the telecommunications industry have worked
18 together in national industry groups to establish standards for the development of
19 various types of billing records to be exchanged between industry members to
20 facilitate customer and carrier billing. Currently those standards are contained in
21 a publication by the Ordering and Billing Forum (OBF) of the Alliance for
22 Telecommunications Industry Solutions (ATIS). Specifically these record
23 formats are contained in the Electronic Message Interface (EMI) document, which
24 contains nearly 1500 pages of detailed information regarding the structure of
25 various types of records and the individual fields within each of those records.
26 The Category 11-01 record is the standard record that is exchanged between

² *In the Matter of an Investigation Concerning the Primary Toll Carrier Plan and IntraLATA Dialing Parity*, 8 Mo. P.S.C. 176, 183 (June 10, 1999).

1 telecommunications providers to provide information for billing of exchange
2 access. As changes take place in the industry, these record descriptions are
3 revised to meet updated requirements for billing information that is to be
4 exchanged.

5
6 Q. Can you provide a copy of the description of the Category 11-01 record from this
7 documentation?

8 A. Yes. Attached as HC Schedule RCS-2 is a copy of the relevant pages from the
9 EMI documentation (3-296 and 3-297) showing the record layout for the
10 Category 11-01-01 record.

11
12 Q. Was the issue of appropriate records dealt with in a further proceeding before the
13 Commission?

14 A. Yes. Shortly after the conclusion of Case No. TO-99-254, the Commission
15 established a new docket to further review network protocols and the business
16 relationships relative to local exchange carriers and the former Primary Toll
17 Carriers in relationship to the LEC to LEC network. This was Case No. TO-99-
18 593. The Commission's order in this case was issued on December 13, 2001.
19 The Commission declined to alter/change existing business arrangements as
20 advocated by the small Missouri LECs and instead required the local exchange
21 carriers to implement changes in record formats and procedures contained in the
22 OBF's Issue No. 2056. The Commission further required the MPSC Staff to
23 provide a report to the Commission after these procedures had been implemented

1 to see if they resolved the issues that were of concern in that case. The Staff's
2 report was presented to the Commission on May 7, 2002, and concluded that the
3 implementation of OBF Issue No. 2056 did not resolve the issues that needed to
4 be addressed. As a result, the Staff and the industry held a series of workshops
5 and discussions that eventually led to the Enhanced Record Rule (ERE) which
6 was adopted by the Commission in Case No. TX-2003-0301.

7
8 **PROVISIONS OF THE COMMISSION'S RULE**

9
10 Q. What is the specific provision of the Missouri Rule that is at issue in this docket?

11 A. It is 4 CSR 240.040(4). The rule states (in relevant part):

12 When transiting traffic for any carrier other than an incumbent
13 local exchange local exchange carrier, originating tandem carriers
14 shall, for each compensable call, create and make the following
15 available upon request by a terminating carrier, at no charge to the
16 terminating carrier:

17
18 (A) A category 11-01-XX record or, if no Carrier Identification
19 Code is available, a Missouri-specific category 11-01-XX record.
20

21
22 Q. What type of record does this require a transiting carrier, such as AT&T Missouri,
23 to provide?

24 A. It requires them to provide a Category 11-01-XX record.
25

26 Q. What is the meaning of the "XX" in the rule?

27 A. In the EMI documentation there are a number of different types of Category 11-
28 01 records to accommodate special situations such as outwats and 800 calls,

1 directory assistance calls, conference calls, etc. Each of these types of calls has a
2 separate "XX" record description that identifies specific fields that are relevant to
3 those special types of calls. For a discussion of the terminating wireless calls
4 which are in question, we can focus on the Category 11-01-01 record.
5

6 Q. Does the Category 11-01-01 record type require the provision of the originating
7 caller's number?

8 A. Yes. As can be seen on HC Schedule RCS-2, the "From Number" field in
9 positions 15-24 of the record contains the ten digits (NPA, NXX, and line
10 number) of the party that originates the call.
11

12 Q. Does the EMI documentation provide a definition of the "From Number"?

13 A. Yes. Attached as HC Schedule RCS-3 is a copy of page 4-46 of the EMI
14 documentation which contains the definition of the "From Number." For
15 numbers within the North American Number Plan, it is the number from which
16 the call originates.
17

18 Q. Included in the seventh paragraph of this definition is a discussion of "Indicator
19 9." Can you discuss the relevance of this indicator to wireless traffic?

20 A. Yes. As indicated in the sixth paragraph under "Special Considerations" in the
21 description of the Category 11-01-01 record, (HC Schedule RCS-2) when this
22 record is used for cellular/wireless traffic, Indicator 9 or 10 should be populated in
23 the record.

1

2 Q. How does the EMI documentation describe the use of Indicators 9 and 10?

3 A. Attached as HC Schedule RCS-4 is the description of these indicators from page
4 4-62 of the EMI documentation. Indicator 9 is used for wireless originated traffic,
5 Indicator 10 is used for traffic terminating to a wireless carrier. Of particular
6 relevance is the fact that cellular traffic is identified by using the value "8" for
7 Indicator 9. If I return to the definition of the "From Number" in HC Schedule
8 RCS-3, the seventh paragraph indicates that if Indicator 9 has a value between 1
9 and 7, the "From Number" would include a Base Station Number of only six
10 characters. However, if Indicator 9 has a value of 8, this circumstance would not
11 apply and the full "From Number" should be provided in the record.

12

13 Q. What is your conclusion then as to whether the EMI documentation requires the
14 originating caller's number (the "From Number") to be included in Category 11-
15 01-01 records?

16 A. It is clear to me from the documentation that the number to be included as the
17 From Number of the Category 11-01-01 record is the number of the caller
18 originating the call. There is no discussion in the EMI documentation of using in
19 this field a substitute number identifying the wireless carrier rather than the
20 originating caller.

21

22 Q. How is the originating company identified in the Category 11-01-01 record?

1 A. The normal means of identification is by populating the Carrier Identification
2 Code (CIC) field in positions 46-49 of the record. However, as described in the
3 fourth paragraph of the Special Considerations for the Category 11-01-01 record,
4 for calls terminating to local exchange carriers, the originating Operating Code
5 Number (OCN) field in positions 167-170 should be populated.

6

7 Q. Does the Rule adopted by the Commission re-emphasize that the originating
8 telephone number shall be the telephone number of the originating caller?

9 A. Yes. In 4 CSR 29.040(6), the Commission's rule states:

10 The originating telephone number shall be the telephone number of
11 the end user responsible for originating the telephone call. Under
12 no circumstances in section (1), (2), (3), (4) and (5) above shall
13 any carrier substitute an originating telephone number other than
14 the telephone number of the end user responsible for originating
15 the telephone call.

16

17 This section of the Rule clearly indicates that for each specific subparagraph of
18 this rule that the originating telephone number shall be the telephone number of
19 the user placing the call. This specifically applies to 4 CSR 29.040(4) which
20 requires the provision of the Category 11-01-XX records. It seems very clear that
21 the Commission's rule specifically requires the originating end user's telephone
22 number to be used in these records as the From Number.

23

24 Q. Does this conclude your testimony?

25 A. Yes.

26

27

Small Telephone Company Group (STCG)

- 1
- 2
- 3
- 4
- 5
- 6 1. BPS Telephone Company
- 7 2. Cass County Telephone Company
- 8 3. Citizens Telephone Co. of Higginsville, Missouri
- 9 4. Craw-Kan Telephone Cooperative, Inc.
- 10 5. Ellington Telephone Company
- 11 6. Farber Telephone Company
- 12 7. Goodman Telephone Company, Inc.
- 13 8. Granby Telephone Company
- 14 9. Grand River Mutual Telephone Corp.
- 15 10. Green Hills Telephone Corp.
- 16 11. Holway Telephone Company
- 17 12. IAMO Telephone Company
- 18 13. Kingdom Telephone Company
- 19 14. KLM Telephone Company
- 20 15. Lathrop Telephone Company
- 21 16. Le-Ru Telephone Company
- 22 17. Mark Twain Rural Telephone Company
- 23 18. McDonald County Telephone Company
- 24 19. Miller Telephone Company
- 25 20. New Florence Telephone Company, Inc.
- 26 21. New London Telephone Company
- 27 22. Orchard Farm Telephone Company
- 28 23. Oregon Farmers Mutual Telephone Company
- 29 24. Ozark Telephone Company
- 30 25. Rock Port Telephone Company
- 31 26. Seneca Telephone Company
- 32 27. Steelville Telephone Exchange, Inc.
- 33 28. Stoutland Telephone Company
- 34

Missouri Independent Telephone Group (MITG)

1. Alma Communications Company, d/b/a Alma Telephone Company
2. Chariton Valley Telephone Corporation
3. Choctaw Telephone Company
4. Mid-Missouri Telephone Company (O'Telco)
5. Mo-Kan Dial Inc
6. Northeast Missouri Rural Telephone Company

HIGHLY CONFIDENTIAL

RCS-2

HIGHLY CONFIDENTIAL

RCS-3

HIGHLY CONFIDENTIAL

RCS-4