

Exhibit No.: _____
Issue: Records
and Related Issues
Witness: Kathryn Allison
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Verizon Midwest
Case No.: TO-99-593
Date Testimony Prepared: January 11, 2001

FILED²

JAN 11 2001

Missouri Public
Service Commission

SURREBUTTAL TESTIMONY
OF
KATHRYN ALLISON
PRODUCT MANAGER
NETWORK SERVICES GROUP--INTERCONNECTION
ON BEHALF OF
GTE MIDWEST INCORPORATED D/B/A VERIZON MIDWEST

JANUARY 11, 2001

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

In the Matter of the Investigation)
Into Signaling Protocols, Call)
Records, Trunking Arrangements,) Case No. TO-99-593
And Traffic Measurement)

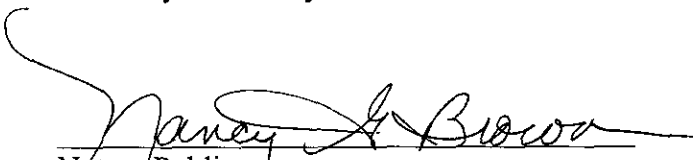
AFFIDAVIT OF KATHRYN ALLISON

STATE OF TEXAS)
) SS
COUNTY OF DALLAS)

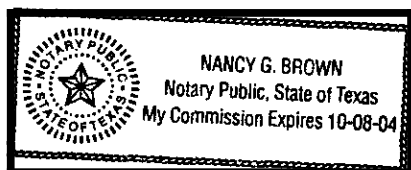
I, Kathryn Allison, of lawful age, on my oath state: I have participated in the preparation of the attached testimony; the answers in the testimony were given by me; I have knowledge of the matters set forth in the answers; and the answers are true and correct to the best of my knowledge and belief.


Kathryn Allison

Subscribed and sworn to before me this 9th day of January 2001.


Notary Public

My Commission Expires:



SURREBUTTAL TESTIMONY OF KATHRYN ALLISON

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Kathryn Allison. My business address is 600 Hidden Ridge, Irving, Texas.

Q. MR. SCHOONMAKER USES THE EXAMPLE OF ACCESS BILLING FOR IXCS TO SUGGEST THAT TANDEM CARRIERS SHOULD BE RESPONSIBLE FOR PAYING FOR THE TERMINATION OF TRAFFIC TO THE SMALL LECS. DO YOU AGREE WITH MR. SCHOONMAKER THAT THE IXC ACCESS EXAMPLE SHOULD APPLY TO THE TERMINATION OF INTRALATA TRAFFIC AT ISSUE IN THIS CASE?

A. No, I do not agree. The IXC access billing environment and the LEC-to-LEC billing environment are different in one crucial respect. Unlike the LEC-to-LEC environment, IXCs have compensation arrangements with other carriers that transport IXCs' access traffic. An IXC also has the ability to bill the originating end user. This arrangement makes the IXC whole for the network functionality it performs. In contrast, the LEC that performs transiting of intraLATA traffic to a terminating LEC does not have the ability to bill the originating carrier. Further, the transiting LEC cannot bill the originating end user of another LEC for intraLATA toll.

1 **Q. MR. SCHOONMAKER STATES THAT UNDER THE SMALL**
2 **COMPANIES' PROPOSAL, THE TERMINATING LEC WOULD BE**
3 **ABLE TO IDENTIFY TRAFFIC BY THE TRUNK GROUP OVER**
4 **WHICH THE TERMINATING TRAFFIC IS DELIVERED. DO YOU**
5 **AGREE? [p. 3, lines 17-18]**

6 **A.** No, I do not agree. Verizon Midwest would not be able to identify all traffic that
7 transits its tandems. For example, Verizon Midwest cannot identify the true
8 originating trunk for traffic that is inter-tandem switched from other LEC
9 tandems. The trunk between LEC tandems is a common trunk and the identity of
10 the originating trunk group is lost when the call is inter-tandem switched.

11
12 The only way for Verizon Midwest to identify traffic by the trunk group over
13 which the traffic is terminated is to have direct connections with every LEC in the
14 LATA, as it does for CLEC and wireless providers. Although direct connections
15 would enable Verizon Midwest to identify the point of interconnection or trunk
16 group and to exchange records with the terminating company, such a network
17 configuration would be very costly, cause premature exhaustion of tandem
18 switches and would be an inefficient network arrangement. For these reasons,
19 Verizon Midwest believes OBF Issue 2056 is the best solution.

20
21 **Q. DO YOU AGREE WITH MR. SCHOONMAKER THAT THE NETWORK**
22 **TEST DEMONSTRATED THAT TERMINATING RECORDINGS ARE**
23 **ACCURATE AND RELIABLE? [p. 14]**

1

2 A. No, I do not agree. In fact, Verizon Midwest submitted data requests for
3 information on the type of terminating recordings used for the test. To date, the
4 data requests have not been answered.

5

6 **Q. MR. LARSEN STATES THAT THE SMALL COMPANIES' PROPOSAL**
7 **WOULD REQUIRE THAT SWBT PREPARE ACCESS USAGE**
8 **RECORDS (AURS) TO RECORD THE TRAFFIC OF OTHER FORMER**
9 **PTCS AND IXCS. DO YOU ADVOCATE THAT THIS TYPE OF**
10 **RECORD BE USED FOR TRAFFIC BETWEEN FORMER PTCS?**

11

12 A. No, I do not. There is a fundamental difference between an IXC and the former
13 Primary Toll Carriers (PTC's) insofar as traffic from a CLEC is concerned. If a
14 CLEC "pops" out the traffic, the IXC receives the toll revenue from the end user
15 and then is responsible for the access charges for that traffic, thus the use of an
16 AUR is appropriate. In the case of the former PTC handling the traffic of a CLEC,
17 the former PTC garners no toll revenue from the end user for the transited traffic.
18 Thus the former PTC is not in the equivalent position as the IXC.

19

20 In addition, the small companies are currently receiving CAT 11 records from the
21 former PTCs, as ordered by the Commission in TO-99-254. The small companies
22 and/or their billing vendors have already modified their billing systems to accept
23 these records and have been billing the appropriate originating carrier since the

1 PTC dissolution, which was effective October 29, 1999. Mr. Larsen concedes
2 that these AURs are acceptable to the small companies to offset SWBT's concern
3 that it should not pay for the termination of another carrier's traffic. The small
4 companies are already receiving these records today - from the originating carrier.
5 There is no additional benefit to be gained by the small companies in changing
6 this record exchange process.

7
8 Finally, if the traffic is inter-tandem routed, the tandem owner serving the
9 terminating LEC would not have sufficient detail to prepare the AUR, because the
10 identity of the originating carrier would not be passed to that tandem owner.

11
12 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

13 **A. Yes.**