

**Response of Small Telephone Company Group
To Southwestern Bell Data Requests No. 1 and 3**

1. Are STCG member companies currently using AT&T Missouri's (formerly known as SBC Missouri) Category 11 Intercompany Billing Records to bill intercarrier compensation to wireless carriers?

Response: Yes.

3. Has any STCG member encountered any problems in using the Category 11 records provided by AT&T Missouri to bill intercarrier compensation to wireless carriers (including, but not limited to, problems encountered with wireless carriers' bills passed on those records)?

Response: Generally no, with the exceptions/clarifications noted on the attached.

FILED²

MAY 16 2006

Missouri Public
Service Commission

EXHIBIT NO. 13
Date 4-18-06 Case No. TE-2006-0053
Reporter PF

ATTACHMENT

BPS Telephone Company: We have encountered no problems in using the Category 11 records provided by AT&T. We have had no way to monitor the interMTA traffic terminated to us to date. Martin is closing to having new reports ready to assist us in this process.

Cass County Telephone Company: We have one billing issue with Sprint PCS which thinks that at the time we switched from paper records to actual records that we double billed them some minutes. We have sent them records and tried to explain to them that it was just timing and if you average the minutes out over a three month period when that was happening, it shows the minutes are in line. They refuse to see it that way and have disputed the amount . . . from that period. They have asked us to settle for 50% of the disputed amount, but I have not agreed yet. Also, we do not record our terminating traffic, so we can't determine if the minutes we receive are correct.

Ellington Telephone Company: No. But, we are unsure if we are able to regularly monitor terminating interMTA traffic.

Fidelity Telephone Company: No problems, other than the lack of an originating phone number, which makes it impossible to determine the jurisdiction of the call.

Granby Telephone Company: We have had problems with amounts being disputed, as in these rate issues, but we are able to see the minutes of use on the statement.

Grand River Mutual Telephone Corporation/Lathrop Telephone Company: We have not had any issues with the wireless carriers disputing the amount of a bill. We are not able to monitor InterMTA traffic. That is either because it is not available in the record or because we are unable to read the information using our current software. (our billing software may not be looking for this info.)

Green Hills Telephone Corporation: The only comp issue is the one related to the third party payer in reference to Alltel telling them to dispute the bills until we get an agreement.

Of course like everyone else, without the CPN we have no way of determining where the call came from or not, whether it is interMTA, interstate, etc.

The CPN is being passed because our switch records it, unfortunately the switch does not have any field identifying the record as a wireless call. The time stamp is off by a hundredth of a second so the only comparison possible is a manual one assuming that the hundredth of a second is just the difference between AT&T recording and our recording. If we treated the common trunk like a feature group D trunk and billed all traffic to AT&T that terminating from it, we would eliminate all of our unidentified traffic issues.

Mark Twain Rural Telephone Company: The problem . . . is AT&T (SBC) doesn't provide the calling party number. So we have to pay our billing company to run studies off our switch data vs. using AT&T information.