

<b>Exhibit No.:</b>	
<b>Issue:</b>	<i>Provision of CPN in wireless records</i>
<b>Witness:</b>	<i>Robert C. Schoonmaker</i>
<b>Type of Exhibit:</b>	<i>Rebuttal Testimony</i>
<b>Sponsoring Parties:</b>	<i>Small Telephone Company Group; Missouri Independent Telephone Group</i>
<b>Case No.:</b>	<i>TE-2006-0053</i>
<b>Date:</b>	<i>April 7, 2006</i>

**SMALL TELEPHONE COMPANY GROUP AND  
MISSOURI INDEPENDENT TELEPHONE GROUP**

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

**REBUTTAL TESTIMONY  
OF  
ROBERT C. SCHOONMAKER**

1  
2  
3  
4  
5  
6  
7  
8  
9

## TABLE OF CONTENTS

BACKGROUND OF WITNESS	2
REQUIREMENTS OF THE COMMISSION'S RULE	3
INDUSTRY STANDARD FOR AMA RECORDING	6
THE COMMISSION'S INTENT AT THE TIME THE RULES WERE ISSUED	9
THE IMPORTANCE OF CPN	11
ISSUES RELATED TO PHASE II OF THIS PROCEEDING	18

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

6  
7  
8 **BACKGROUND OF WITNESS**

9  
10 Q. Please state your name and address.

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

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

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

17  
18 Q. Are you the same Robert C. Schoonmaker that previously filed direct testimony in  
19 this case?

20 A. Yes.

21  
22 Q. What is the purpose of your rebuttal testimony?

23 A. I will respond to the testimony of AT&T-Missouri (AT&T) witnesses Mr. Read  
24 and Mr. Constable regarding the industry standards established for wireless  
25 originated billing records. I will challenge their assertions as to these industry  
26 standards as they relate to the rule adopted by the Commission. I will respond to  
27 the testimony of Staff Witness Mr. Voight. Finally, I will present testimony

1           responding to the evidence presented by Mr. Read and Mr. Constable that is more  
2           appropriate to the second phase of this proceeding, should one be necessary.  
3

4   **REQUIREMENTS OF THE COMMISSION'S RULE**

5   Q.    Is there any disagreement among the various parties' witnesses as to whether the  
6           Commission rule requires the provision of Category 11-01-XX records?

7   A.    There is not. Each of the witnesses acknowledges that 4 CSR 29.040(4) requires  
8           AT&T Missouri to provide Category 11-01-XX records.  
9

10 Q.    Is there disagreement between AT&T Missouri and the STCG/MITG regarding  
11           the document that establishes the industry standard for the Category 11-01-XX  
12           records?

13 A.    There is not. We both agree that the Ordering and Billing Forum's (OBF)  
14           Enhanced Message Interface (EMI) document is the appropriate document  
15           establishing the standards for the Category 11-01-XX records. Both Mr. Read  
16           and I provided the same pages from the same version of this document as  
17           Schedules or Attachments to our testimony showing the description of the  
18           Category 11-01-01 record.  
19

20 Q.    Does this record have a field in it for the From Number?

21 A.    It does. It is shown in Positions 15-24 of the Category 11-01-01 record as shown  
22           in HC Schedule RCS-2, page 1, and Read Schedule 6(P). I provided as HC  
23           Schedule RCS-3 the definition from the EMI manual of the From Number. I

1 believe this is the same number that is described in the Commission's Rule as the  
2 Calling Party Number (CPN). It is the number of the party originating the call.  
3

4 Q. Is this field in the Category 11-01-01 record a required field?

5 A. Based on my review of the EMI documentation it clearly is. In the opening  
6 section of the EMI document giving General Description items, Section 1.4  
7 describes Shading Requirements. As can be seen from HC Schedule RCS-5  
8 attached to this testimony which is Page 1-1 of the EMI document, the document  
9 states, "Shaded fields are not required..." and that "Unshaded fields are required  
10 and therefore will contain information based on the field definition." Therefore, I  
11 conclude that since the From Number field is unshaded in the Category 11-01-01  
12 record, it is a required field.  
13

14 Q. Where does the information regarding the shading of fields appear for the  
15 Category 11-01-01 record?

16 A. While for many of the records the shading appears on the face of the record  
17 format, for the Category 11-01-01 record the "shading" is documented by a  
18 matrix at the bottom of the previous page as shown on Page 1 of HC Schedule  
19 RCS-2 and on Read Schedule 7(P). The sentence before the matrix states, "The  
20 matrix below lists what fields are shaded on the 11-01-01 based on Feature  
21 Group. A value of X in a given column means that the field is shaded for that  
22 Feature Group." In the matrix immediately below that, the From Number field

1 (Positions 15-24) is not listed. This indicates that the From Number field is a  
2 required field for all Feature Groups and uses of the record.

3

4 Q. Does the EMI documentation support the assertion stated by the AT&T witnesses  
5 that the Category 11-01-01 record that AT&T Missouri produces is an industry  
6 standard record when it does not contain the From Number for wireless calls?

7 A. It does not. The EMI documentation clearly illustrates that the From Number  
8 field is a required field in the Category 11-01-01 record.

9

10 Q. Does this contradict the assertion of Mr. Read on Page 20, Lines 21-23, that CPN  
11 is not a required field in the Category 11-01-01 record?

12 A. It does, unless Mr. Read is relying on terminology differences. Technically the  
13 Category 11-10-01 record requires the From Number not CPN. But AT&T  
14 Missouri is not providing the From Number in that field in their wireless records,  
15 so AT&T's records are deficient in this regard.

16

17 Q. Do the AT&T witnesses make any comment related to 4 CSR 29.040(6) which  
18 specifically prohibits replacing the originating telephone number of the end user  
19 with any other number?

20 A. They do not. This section of the Rule specifically prohibits replacing the end  
21 user's originating number with some other number including in the Category 11-  
22 01-XX records referenced in 4 CSR 29.040(4)(a) as AT&T Missouri is currently  
23 doing in the non-standard Category 11-01-XX records they provide.

1     **INDUSTRY STANDARD FOR AMA RECORDING**

2     Q.     One of the arguments that Mr. Read and Mr. Constable put forward is that the  
3             industry standard AMA record for wireless calls does not contain the From  
4             Number and therefore it is not available to AT&T Missouri to put in the Category  
5             11-01-01 record. Do you see flaws in this argument?

6     A.     I do. On Page 10 of his direct testimony Mr. Constable quotes from the Telcordia  
7             GR 1504 document that the Originating Number field "...shall contain the per-  
8             trunk-group billing number of the WSP". He apparently concludes that the AMA  
9             record will not contain the actual originating number, and it is therefore  
10            unavailable to be used in the Category 11-01-01 record. However, Mr. Constable  
11            ignores other parts of that document which show that the AMA is required to  
12            contain that information in other parts of the record.

13

14    Q.     Do you have any disagreement with Mr. Constable that the Telcordia GR 1504  
15             document is an industry standard document for the AMA recording of wireless  
16             calls?

17    A.     I do not, but I do have disagreements with Mr. Constable's conclusions based on  
18             this one requirement (R3-85) of the document. There are other parts of that  
19             document which are relevant to what is required in an AMA record.

20

21    Q.     Does the Telcordia GR 1504 document describe the differences between  
22             requirements, conditional requirements, and other categories in the AMA record?

1 A. It does. Referring to Constable Schedule 2(P) which is the Telcordia GR 1504  
2 document, at the top of page 16 of 62, or page 1-4 of the document, there is a  
3 description of five different categories of "requirements": (1) requirements, (2)  
4 conditional requirements, (3) objectives, (4) conditional objectives, and (5)  
5 conditions. Each of these categories has a different lead-in letter or letters to  
6 denote which category it falls into. In regard to requirements the document states:

7 "Requirement – Feature or function that, in the Telcordia view, is  
8 necessary to satisfy the needs of a typical facilities-based Local Exchange  
9 Carrier (LEC). Failure to meet a requirement may cause application  
10 restrictions, result in improper functioning of the product, or hinder  
11 operations. A requirement contains the words *shall* or *must* and is flagged  
12 by the letter "R"." [emphasis in original]  
13

14 Therefore, if a requirement is identified by the letter "R", it is in fact a  
15 required part of the record.  
16

17 Q. You mentioned that there were other parts of the Telecordia GR 1504 document  
18 that relate to the capture of CPN information within the AMA record for wireless  
19 carriers. Can you expand on this?

20 A. Yes. Mr. Constable quoted part of requirement **R3-85** in regard to the Originating  
21 Number field in the AMA record, but that is not the only part of the wireless  
22 record that refers to CPN information. At the top of the page that Mr. Constable  
23 was quoting from (Page 44 of 62 of Constable Schedule 2(P)) and the bottom of  
24 the prior page are listed requirements **R3-79** and **R3-80**. These two requirements  
25 specifically require Module 164 to be appended to the AMA record and that it be  
26 populated with the appropriate data described in requirement **R3-59**, Table 3-2.



1 The wording of these requirements are "shall append" and "shall populate"  
2 respectively. They are requirements.

3  
4 Turning now to Pages 39 and 40 of Constable Schedule2(P), the requirements of  
5 **R3-59 including Table 3-2** require that the system "shall populate" Module Code  
6 164 of the AMA record " with the numbers contained in the parameter(s) of the  
7 Initial Address Message for SS7 signaling or the ANI for MF signaling..." as  
8 described in Table 3-2. In viewing Table 3-2, one can see that if the CPN is  
9 included in the SS7 signaling, it is to be recorded in Module Code 164.

10  
11 Q. Does Mr. Constable acknowledge that AT&T Missouri receives the CPN in calls  
12 for which SS7 signaling is provided?

13 A. Mr. Constable acknowledges that is the case for the majority of the calls they  
14 receive and indicates AT&T Missouri's compliance with 4 CSR 29.040(1) and (2)  
15 which require originators to provide CPN and transiting carriers to transmit it  
16 along the network. Thus, AT&T Missouri acknowledges that CPN is available (at  
17 least for the vast majority of calls) in their network so that it could be recorded.  
18 The AMA recording requirements as evidenced by Constable Schedule 2(P)  
19 require this information to be recorded in the AMA record. Thus, under the  
20 standards documents it should be available to AT&T Missouri's billing system to  
21 include in the Category 11-01-01 records required by 4 CSR 29.040(4).

1 Q. Do the requirements in **R3-85**, **R3-79**, and **R3-80** all apply to calls terminating  
2 from a wireless service provider (WSP) to a tandem switch?

3 A. Yes. These requirements all fall in Section 3.8.2 of the document (see Page 43 of  
4 62, Constable Schedule 2(P)) which describes these records as records generated  
5 at a tandem switch from Type 2A connections terminating to the LEC from a  
6 WSP (wireless service provider).

7

8 **THE COMMISSION'S INTENT AT THE TIME THE RULES WERE ISSUED**

9 Q. In addition to the specific requirements in the Commission Rules and standards  
10 documents for Category 11-01-XX records, did the Commission indicate its intent  
11 that the originating CPN be provided in addition to the identification of the  
12 carrier?

13 A. Yes. Mr. Read attempts to argue that the AT&T Missouri record (which does not  
14 contain the originating telephone number of the end user) complies with the  
15 "intent" of the Commission Rule (Read direct, p. 20, lines 17-19). Mr. Read  
16 argues this is the case because the Title of 4 CSR 29.040 and the Purpose of the  
17 rule only refer to the identification of a carrier. I do not agree that the Title and  
18 Purpose of the rules are the only part of the rule that indicates the Commission's  
19 intent. 4 CSR 29.040(1) and (2) specifically require the provision of "originating  
20 caller information" and 4 CSR 29.040(6) requires the provision of the "originating  
21 telephone number" of the end user originating the call. These rules make clear  
22 the Commission's intent that more than the identification of the originating carrier  
23 is to be provided. Furthermore, this Chapter of the Commission's Rules is

1       entitled the "Enhanced" Record Exchange Rule. Presumably, the Rule was  
2       intended to enhance the records the small rural ILECs were receiving prior to the  
3       rule. Without inclusion of CPN or the From Number in the billing records for  
4       wireless calls, the rule would provide little or no enhancement in the record.

5  
6    Q.   At the time the Commission issued its Final Order of Rulemaking did the  
7       Commission further make clear its intent that the Category 11-01-XX records for  
8       wireless calls should contain the same information?

9    A.   Yes. Mr. Voight in his testimony (p. 12) quotes two paragraphs from the  
10       Commission's Final Order of Rulemaking that clearly state the Commission's  
11       intent that CPN be provided in the records related to wireless calls. Further, Mr.  
12       Voight states that the Staff agreed with that determination at the time that the  
13       Order was issued. It was only several months later, in October, 2005 that Staff  
14       came to a different opinion. It is clear from both the Order itself and from Mr.  
15       Voight's testimony that at the time the Order was issued, it was the intent of the  
16       Commission in implementing the rule that CPN be provided in the wireless  
17       records. As I have further shown, these statements simply confirm the  
18       requirements of the EMI document that establishes the industry standard for the  
19       Category 11-01-XX record which is also required by the Commission Rules.

1    **THE IMPORTANCE OF CPN**

2    Q.    In his Direct Testimony (pp. 24, Lines 24-25), Mr. Constable states that "CPN is  
3           valuable for providing Caller ID services as well as assisting in lawful intercepts  
4           and 911 services." Do you agree that CPN is only valuable for those purposes?

5

6    A.    No. CPN is valuable for other purposes as well. Indeed, as explained by Staff  
7           witness Voight, the ability to identify end users permits terminating carriers to  
8           determine the originator of the calls and to verify the end users' wireless carriers.

9           He further states:

10

11                 "In many instances (but not all instances), knowing the CPN will  
12                 assist the terminating carrier in verifying the proper jurisdiction of  
13                 wireless-originated telephone calls. Billing records that contain CPN  
14                 of wireless-originated calls can aid terminating carriers in  
15                 establishing practices which reveal network usage. In my opinion,  
16                 the lack of CPN within the billing record restricts, perhaps severely,  
17                 the ability of terminating carriers to insitute general network auditing  
18                 guidelines." (Voight Direct Testimony, page 6, lines 10-16)

19

20   Q.    Has AT&T Missouri recognized the usefulness of CPN in wireless records in  
21           other venues?

22   A.    Yes. In other cases where AT&T Missouri is the terminating carrier it has  
23           forcefully argued that the information required by this rule is necessary in order to  
24           bill for wireless traffic. On August 11, 2005, SBC filed a Notice of Ex Parte in  
25           Federal Communications Commission ("FCC") Docket No. 01-92 in which it  
26           discussed SBC's position on phantom traffic and a proposed solution. I have  
27           attached this filing as Schedule RCS-6 of my testimony. In this filing, SBC urged  
28           the FCC to establish rules requiring adequate and appropriate call signaling. SBC

1 further stated that carriers require call detail information to bill usage-based  
2 charges to other carriers and that to bill the correct rate a carrier must know the  
3 jurisdiction of the call derived from the calling and called party numbers. SBC  
4 suggested that the proposed rule include a provision requiring that, where  
5 technically feasible, originating carriers *shall transmit* calling party number and  
6 transmitting carriers *shall transmit* calling party number information as received.<sup>1</sup>  
7 Thus, in this context, AT&T Missouri argued that CPN should be required to  
8 assist in determining call jurisdiction.

9  
10 In another FCC case, AT&T Missouri has filed public pleadings in which it stated  
11 that it was entitled to rely upon the information CPN provides for purposes of  
12 billing for wireless traffic.<sup>2</sup> In that case, AT&T Missouri characterized the  
13 provision of ANI (recognized by the ERE rule as another term for CPN) in order  
14 to determine call jurisdiction as a “standard industry practice” for years:  
15

---

<sup>1</sup>*SBC Notice of Ex Parte, Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, August 11, 2005 (emphasis added), p. 13.

<sup>2</sup>*In the Matter of SBC Communications Inc. Petition for Declaratory Ruling Concerning Terminating Switched Access Charges for Wireless-Originated Calls*, FCC WCB Docket No. 04-424, filed November 12, 2004. SBC filed a petition for declaratory judgment with the FCC in which it relied upon the inclusion of CPN. The FCC request was the result of a referral from the United States District Court of the Eastern District of Missouri. There was litigation in the Eastern District between SBC and Global Crossings. The issue at the heart of the litigation was whether interexchange carriers delivering wireless traffic to SBC were obliged to provide the originating telephone number of the calling party. The originating telephone number is referred to as ANI (automatic number identification), or as CPN (calling party number). SBC asked the FCC to declare that, in the absence of accurate and reliable information as to originating caller location, SBC’s access tariffs permitted SBC to use the telephone number of the calling party to ascertain the jurisdiction of the call.

1 Because long distance carriers provide no other information to local  
2 carriers as to the geographic location of wireless subscribers who  
3 place or receive telephone calls, **it has been standard industry**  
4 **practice for years to use calling and called party telephone**  
5 **numbers to determine the jurisdiction of, and thus appropriate**  
6 **access charges for, wireless originated calls.”<sup>3</sup>**  
7

8 Thus, AT&T Missouri’s position in this case is in direct contradiction to its  
9 position before the FCC in a case where it believed that CPN was necessary for its  
10 own use.

11  
12 Q. In his testimony Mr. Voight states that CPN is not a reliable jurisdictional  
13 indicator for wireless calls in all instances (p. 8, lines 7-8). Do you agree with  
14 that statement?

15 A. Yes, I agree that CPN is not always a reliable jurisdictional indicator for wireless  
16 calls because of the mobility of the wireless customer. However, it is better than  
17 any other information that is currently available. Mr. Voight states that CPN  
18 should only be used in establishing general auditing guidelines, such as using  
19 CPN to monitor billing records to determine if there are excessive amounts of  
20 interstate, interMTA wireless-originated calls being terminated over local  
21 interconnection trunks instead of access trunks. Calling party number information  
22 was used by Mark Twain Rural Telephone Company (“Mark Twain”) in  
23 performing a traffic study to determine that 70% of the traffic from T-Mobile

---

<sup>3</sup>*SBC’s Petition for Declaratory Ruling*, Docket No. WCB 04-424, p. iv (emphasis added).

1 callers that terminated to the Mark Twain exchanges was interMTA.<sup>4</sup> In a  
2 subsequent arbitration case involving Alma Telephone Company ("Alma") the  
3 Commission accepted the validity of this method of determining the jurisdiction  
4 of wireless traffic terminated to the companies. The Commission stated,  
5 "The BPS decision is guidance for the Commission's accepting the  
6 validity of the studies that Chariton Valley, Mid-Missouri, and  
7 Northeast submitted. The Commission accepted the methodology of  
8 an NPA-NXX study to ascertain traffic jurisdiction."<sup>5</sup>  
9

10 As was aptly stated by Mr. Voight:

11 "...knowledge of who is using the telephone network is simply a good  
12 business practice. Moreover, *omission* of CPN in billing records  
13 restricts the ability of terminating carriers to employ reasonable  
14 practices designed to obtain such knowledge." (Voight Direct  
15 Testimony, page 8-9)  
16

17 Q. In Staff witness Mr. Voight's testimony (p. 6, lines 14-18) he states that the "only  
18 potential ramification" of not including CPN in the Category 11-01-XX billing  
19 records is the possible loss of the ability to "...institute general network auditing  
20 guidelines." Do you agree that this is the only ability that is lost without CPN in  
21 the Category 11-01-XX billing records?

22 A. No. I believe the ramifications are greater than that. One of the lessons learned  
23 from the network test that was conducted by the industry and described in the  
24 testimony in Case No TO-99-593 was that human errors in instructing switches to

---

<sup>4</sup>*BPS Telephone Company, et al. v. Voicestream Wireless Corporation et al.*, TC-2002-1077, Report and Order issued January 27, 2005, pp. 25, 29.

<sup>5</sup>*In the Matter of the Petition of Alma Telephone Company for Arbitration of Unresolved Issues Pertaining to a Section 251(b)(5) Agreement with T-Mobile USA, Inc.*, Case No. IO-2005-0468, Arbitration Report issued October 6, 2005, page 10.

1 record traffic can cause serious "phantom traffic" problems. It was during that  
2 test that the error that AT&T Missouri (then SWBT) made in programming its  
3 Ericsson switches was revealed. In that test there was also a single trunk group in  
4 the SWBT switch in Sikeston that was identified as not generating billing records.  
5 A key element in identifying these problems was making "record-by-record"  
6 comparisons of records recorded at the terminating switch with the billing records  
7 received from the tandem switch. Having the originating number (CPN or From  
8 Number) in both of these records facilitates making these comparisons so that the  
9 source of missing billing records can be identified. A lack of the CPN in the  
10 wireless Category 11-01-XX records makes a valid comparison of those records  
11 to records recorded at the end office more difficult.

12  
13 Q. At the top of Page 7 of his testimony, Mr. Voight discusses how the fictitious  
14 number that AT&T Missouri places in the From Number field can be used to  
15 identify the originating wireless carrier. Is it necessary to have this fictitious  
16 number in the From Number field to identify that carrier?

17 A. No. Both the EMI documentation (Read, Schedule 6(P)) and the SBC Accessible  
18 Letters (Read, Schedules 2, 3, and 4) identify that the Originating Carrier can be  
19 identified by the Originating OCN number in Positions 167-170 of the Category  
20 11-01-XX records. There is no need to have a fictitious number in the From  
21 Number field in order to identify the responsible carrier.



1 Q. In his Direct Testimony, Mr. Read states that “no party’s written comments in the  
2 rulemaking indicated an understanding that the rule included such a [CPN]  
3 requirement.” Do you agree with this statement?

4  
5 A. No. On October 29, 2004, Mr. Johnson wrote to Leo Bub, counsel for AT&T, to  
6 express the small companies’ concerns with the new wireless records. One of the  
7 concerns raised by Mr. Johnson was that the records did not comply with the  
8 proposed ERE Rule. Among the specific concerns raised by Mr. Johnson was the  
9 fact that the wireless records did not contain CPN:

10 Consistent with Category 11 record formats, the small companies  
11 expected the new record would provide the originating caller’s  
12 number. The failure to provide the calling party number  
13 contradicts the current draft of the Enhanced Record Exchange  
14 Rule.<sup>1</sup>

15  
16 A copy of this correspondence is included as Schedule RCS-7, and it  
17 demonstrates the small companies’ understanding that the ERE Rule would  
18 require CPN for wireless calls.

19 Later, in the Supporting Comments of the Missouri Independent  
20 Telephone Company Group, the MITG expressed its support for the ERE rule and  
21 explained why it was necessary. The MITG stated at page 12 of its Comments  
22 that despite being promised an “IXC-type” record in place of the CTUSR, the  
23 companies found that, “Instead of providing the caller’s number [as had been  
24 promised], the new record simply puts in an assigned number representing the  
25 CMRS provider.” The MITG further stated, “Thus when the new ‘IXC’ record is  
26 retrieved and assimilated, it provides no more information with respect to traffic

---

<sup>1</sup> See Schedule RCS-6, E-mail correspondence from Craig Johnson to Leo Bub dated Oct. 29, 2004.

1 jurisdiction than did the CTUSR. This record deficiency means the terminating  
2 LEC cannot reconcile traffic, and therefore cannot identify what carriers are  
3 failing to record and pay for traffic.”

4 At the hearing in Case No. TX-2003-0301, Mr. Johnson again explained  
5 the problem with what the companies thought was going to be an “IXC-type”  
6 wireless record from AT&T Missouri. He stated:

7  
8 [W]e realized that that record was not providing us with the calling party  
9 number either. In lieu of that calling party number, it was giving us a single  
10 phone number associated with a particular wireless carrier, so that as a result  
11 of the new records, we still have basically the same information that we  
12 were receiving under the CTUSR, which was a total number of minutes that  
13 was terminating from a particular wireless carrier.

14  
15 Because of the absence of the CPN, we did not get the information that  
16 would have helped us jurisdictionalize the traffic. (Transcript, pp. 77-78)  
17

18 These correspondence, comments, and statements clearly show that the  
19 terminating companies did address the issue of CPN in the wireless billing records  
20 during the rulemaking proceeding and clearly believed that the rule required its  
21 inclusion, since the “IXC-type” records being provided by AT&T Missouri had  
22 failed to provide that information.

23  
24 Q. Mr. Read provided Read Schedules 2-4 as attachments to his testimony showing  
25 the correspondence AT&T Missouri (then SBC) provided regarding the  
26 replacement of the CTUSR records with the Category 11-01-XX records. Did  
27 this correspondence give any indication that the From Number in these records  
28 was not the actual originating number of the party making the call?

1 A. They do not. There is no mention that the From Number would contain a  
2 fictitious number identifying a carrier rather than the end user originating the call.  
3 In fact, the April 22, 2004 letter (Read Schedule 3) implies that the record format  
4 would be the same as the IXC records that were implemented in 2002, records  
5 which do contain the actual From Number of the originating end user.<sup>2</sup>  
6

7 **ISSUES RELATED TO PHASE II OF THIS PROCEEDING**

8 Q. Has the STCG/MITG filed a motion to strike portions of the testimony of Staff  
9 Witness Voight and the AT&T witnesses?

10 A. Yes. The motion has been filed because some portions of the testimony of those  
11 witnesses do not, in the opinion of the STCG/MITG, address the issue of whether  
12 the current Commission Rule requires the provision of CPN, but rather address  
13 the issue of whether AT&T Missouri should be granted a waiver of the rule if it  
14 does, in fact, require CPN to be provided in the Category 11-01-XX records.  
15

16 Q. Have you prepared rebuttal testimony to some of the testimony that the  
17 STCG/MITG proposes be stricken?

18 A. Yes. The motion was only filed recently and has not been acted upon by the  
19 Commission. The testimony following is offered as rebuttal testimony to the  
20 testimony that the STCG/MITG proposes be stricken. Should the Commission  
21 rule in favor of the STCG/MITG motion, the following testimony will be  
22 withdrawn by the STCG/MITG.

---

<sup>2</sup> See Read Schedule 3, Second Paragraph – “The format for these records will be the standard ATIS/OBF EMI Category 11-01-XX mechanized detail call record that was implemented on IXC traffic beginning August 2002.”

1 Q. Mr. Read argues that AT&T Missouri should be allowed to continue to provide  
2 the records they do currently because other carriers provide them that way around  
3 the country. Specifically, he indicates on page 20, line 11, that Sprint Missouri  
4 provides records in the same manner as AT&T does. Do you have information to  
5 challenge that characterization?

6 A. Yes. While Sprint Missouri may have done that in the past, Sprint has modified  
7 its systems to produce the appropriate records in compliance with the  
8 Commission's rules. In an e-mail dated March 14, 2006 to Mr. Randy Boyd of  
9 Kingdom Telephone Company, Gary Manderfeld of Sprint stated the following:

10

11 Sprint Nextel implemented a process on 3/3 where the trunk groups on  
12 both the CLEC and Wireless trunks are recording the module 164,  
13 which provides the charge or calling party number. Kingdom will see  
14 the originating number populated with the true calling party/charge  
15 party number and the originating OCN will also be populated on the  
16 next set of files they receive 3/31.  
17

18 Q. Do you draw any inferences from Sprint Missouri's ability to comply with the  
19 Commission's Rule in relationship to AT&T Missouri's testimony about the  
20 burden they will have to bear to accomplish the same task?

21 A. Yes. I would note that Sprint ILEC operations are substantially smaller than  
22 AT&T's. If Sprint can accomplish this change and absorb it within their much  
23 smaller operation, it raises questions in my mind as to how significant it would be  
24 for AT&T to achieve the same objective in its much larger operation, particularly  
25 when it would appear to put AT&T in compliance with the industry standard EMI  
26 requirements and the AMA requirements as shown in Constable Schedule 2(P).

1 Q. On Page 22 of AT&T Witness Read's testimony he indicates that AT&T is  
2 opposed to being required to provide CPN because that requirement is not an  
3 industry standard and because AT&T would be required to pay a substantial  
4 amount of money to provide that capability in its switches and billing processes.  
5 What are your comments in regard to these concerns?

6 A. While both Mr. Read and Mr. Constable state several times that the current  
7 records they provide are in compliance with industry standards and that changing  
8 them would make the records non-standard, the standard industry documentation  
9 shows just the opposite. My direct testimony and this rebuttal testimony  
10 demonstrate that the From Number is a required field in the Category 11-01-XX  
11 billing record. I have also demonstrated that the requirements of the Telcordia  
12 GR-1504 AMA standard for wireless records require the CPN information to be  
13 recorded by the switch, contrary to Mr. Cosntable's assertions. Thus, complying  
14 with the Commission's rule to include the From Number or CPN in the Category  
15 11-01-XX record will cause AT&T-Missouri to come into compliance with the  
16 industry standard rules for both billing and AMA records. It is something they  
17 should be doing even if the Commission Rule did not require it.

18 Secondly, while the \$1 million that Mr. Read indicates AT&T would have  
19 to pay Lucent Technologies is not an insubstantial amount of money in many  
20 contexts, in the context of AT&T's total operations, it is a relatively small figure.  
21 For example, the 2005 AT&T Inc. annual report indicates that AT&T had total  
22 operating expenses of \$37.7 billion. An expenditure of \$1 million thus equates to  
23 approximately 3 thousandths of one percent (.003%) of AT&T's operating

1 expenses. In order to put this expense into perspective, Citizens Telephone  
2 Company of Higginsville, Missouri reported total operating expenses of  
3 \$3,669,606 in its 2005 Annual Report. Applying the same .003% to Citizens  
4 Telephone Company's total operating expenses results in \$110. Thus, for AT&T  
5 to incur an expense of \$1 million is roughly equivalent to Citizens Telephone  
6 Company expending \$110. From this perspective, the amount AT&T would be  
7 required to expend is not so substantial or burdensome. One also needs to keep in  
8 mind that this would allow AT&T in all of its states to come into compliance with  
9 the Telcordia GR-1504 AMA standard for wireless records.

10

11 Q. Mr. Constable suggests on Page 15 of his testimony that by the time that AT&T  
12 Missouri could meet the requirement to include the From Number in its records,  
13 the FCC might change the rules for intercarrier compensation and make those  
14 records obsolete. What is your response?

15 A. I acknowledge that the FCC is closer now to taking some action on intercarrier  
16 compensation than it was when its proceeding started nearly five years ago, but it  
17 is still very uncertain when any changed requirements might be implemented and  
18 what they might entail. I am aware that one of the proposals currently being  
19 discussed in the industry contemplates that rural ILECs would continue to bill  
20 wireless providers under reciprocal compensation requirements that are similar to  
21 today's requirements for several more years. Thus, bringing AT&T Missouri's  
22 records into compliance with the Commission's rules and industry standards as I

1           have discussed would probably be able to be completed and in place for several  
2           years before FCC compensation rules might make them less necessary.

3

4    Q.     Does this conclude your rebuttal testimony in this phase of this proceeding?

5    A.     Yes, it does.