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Issue: Telephone Specific
Witness: William L. Voight
Sponsoring Party: MO PSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: TE-2006-0053
Date Testimony Prepared: April 7, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

WILLIAM L. VOIGHT

AT&T MISSOURI

CASE NO. TE-2006-0053

Jefferson City, Missouri

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of)
Southwestern Bell Telephone, L.P., d/b/a)
AT&T Missouri, for a Waiver of Certain)
Requirements of 4 CSR 240-29.040(4))

Case No. TE-2006-0053

AFFIDAVIT OF WILLIAM L. VOIGHT

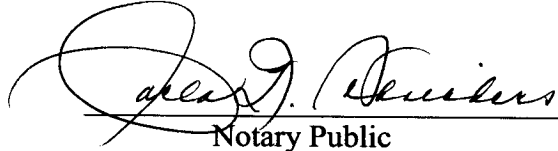
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

WILLIAM L. VOIGHT, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 7 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



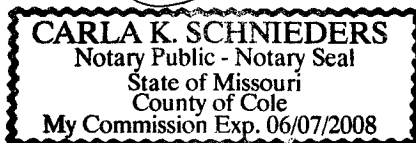
William L. Voight

Subscribed and sworn to before me this 7th day of April, 2006.


Notary Public

My commission expires

June 7, 2008



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WILLIAM L. VOIGHT

CASE NO. TE-2006-0053

A. Yes.

A. My testimony is responsive to statements made in Direct Testimony by Mr. Schoonmaker of the Small Telephone Company Group (STCG), and by Messrs. Constable and Read of AT&T Missouri (AT&T).

A. My reading of the testimony leads me to the conclusion that Mr. Schoonmaker is primarily discussing the Category 11 billing records created for interexchange (IXC) traffic, and Mr. Read is primarily discussing the Category 11 billing records created for LEC-to-LEC traffic.

1 **Q. What is the difference in IXC traffic and LEC-to-LEC traffic?**

2 A. The differences in the two traffic types are set forth in 4 CSR 240-29.010
3 (15) and (19). IXC traffic is that which traverses an interexchange carrier's point
4 of presence; LEC-to-LEC (or simply "LEC") traffic is that which does not.

5 In my opinion, the differences are substantial. For example, all traffic
6 carried on the IXC network is subject to access charges (even when the telephone
7 call is originated and terminated within the same local calling scope). Because
8 access charges apply, all traffic occurring on the IXC network is considered "long
9 distance" for the purposes of inter-carrier compensation. On the other hand,
10 traffic carried on the LEC network may be considered "long distance," or it may
11 be considered "local" in nature. If considered "local," access charges *do not*
12 apply and if traffic occurring on the LEC network is "long distance," intercarrier
13 access charges *do* apply. Even if considered "local," there are instances where no
14 inter-carrier compensation is due, and there are instances of where a "reciprocal
15 compensation" form of inter-carrier compensation is due. The issue in this case
16 involves wireless-originated traffic which is primarily "local" in nature, meaning
17 that the inter-carrier form of compensation is reciprocal compensation, not
18 exchange access.

19 The differences in IXC and LEC traffic extend beyond the form of inter-
20 carrier compensation. For example, IXC traffic terminates over Feature Group
21 "A", "B", or "D" trunking arrangements. LEC traffic occurs over "common"
22 trunks, customarily characterized as Feature Group "C" trunking arrangements.

1 The differences in IXC and LEC traffic do not conclude with trunking
2 arrangements. In my view, the most significant difference between IXC traffic
3 and LEC traffic is the inter-carrier billing relationship imposed on the terminating
4 carrier. For IXC traffic, the terminating carrier simply bills the long distance
5 carrier, including billing for wireless-originated traffic. Similarly, for any other
6 traffic that is sent to the terminating carrier by the long distance carrier, the
7 terminating carrier simply bills the long distance carrier for that traffic. For LEC
8 traffic, a completely different billing relationship exists. For LEC traffic, the
9 terminating carrier may not bill the “transiting” carrier. Instead, the terminating
10 carrier must bill the carrier responsible for placing the call on the network. Such
11 carriers are sometimes called the “originating” carrier.

12 From my perspective, the unique billing relationship for transiting traffic
13 occurring on the LEC network represents a significant difference between that
14 traffic and IXC traffic. Unlike IXC traffic, where the long distance carrier is
15 responsible for all traffic (including all forms of third-party traffic, including
16 wireless-originated traffic), transiting carriers are not responsible for any third-
17 party traffic sent to terminating carriers (including wireless-originated traffic).
18 For this reason, CPN should not be used to identify the responsible party for
19 wireless originated traffic occurring on the LEC network.

20 **Q. Do Category 11-01-XX billing records for IXC traffic contain the**
21 **CPN for wireless-originated calls?**

22 A. Yes. Industry Standard Category 11-01-XX billing records for IXC traffic
23 do contain the “From Number” in bit positions 15 to 24 of the billing record. The

1 “From Number” is exactly the same as “CPN” for wireless-originated calls.
2 Presence of wireless-originated CPN in billing records of IXC traffic is evident
3 from the Schedules of both Mr. Schoonmaker and Mr. Read. The presence of a
4 “From Number” in the billing records for wireless-originated calls is also self
5 evident from depositions taken, and access tariffs referenced in, Case No. TT-
6 2004-0542.¹

7 **Q. Please explain the basis of your conclusion that Mr. Schoonmaker is**
8 **primarily focusing on the Category 11 records created for IXC traffic.**

9 A. As I would understand his testimony, Mr. Schoonmaker’s position relies
10 on descriptions found in Schedules RCS-3 and RCS-4, and the belief that a “value
11 of 8” in Indicator 9 (indicating cellular originated traffic) would lead to
12 circumstances whereby a full and complete “From Number” should be applied in
13 the Category 11-01-XX billing record. The examples shown in RCS-2 (page 3-
14 296) pertain to access traffic, carried over Feature Group “A”, “B”, “C”, and “D”
15 trunking arrangements, as applied to message telephone service (MTS) (also
16 known as “long distance” service).

17 Mr. Schoonmaker’s examples do not acknowledge that the traffic
18 recording at issue in this case is not access traffic; rather, the traffic at issue in this
19 case is primarily subject to reciprocal compensation (with the sole exception of
20 individually negotiated interMTA factors). Mr. Schoonmaker’s testimony omits
21 the fact that the traffic recording at issue in this case is not subject to an IXC
22 billing relationship; rather, the traffic at issue in this case is subject to a LEC

¹ RE: *In the Matter of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri’s Proposed Revision to Its PSC Mo. No. 36 Access Service Tariff.*

1 billing relationship. Lastly, Mr. Schoonmaker's testimony omits any
2 acknowledgement that the traffic recording at issue in this case is not "long
3 distance;" rather, the traffic at issue in this case is primarily "local" in nature. For
4 these reasons, I would respectfully disagree with Mr. Schoonmaker that RCS-2, 3,
5 and 4 demonstrate a requirement that Category 11-01-XX billing records contain
6 CPN for wireless-originated calls occurring over the LEC-to-LEC network.

7 **Q. Please explain the basis for your conclusion that Mr. Read's testimony**
8 **primarily focuses on the billing records created for LEC traffic.**

9 A. Mr. Read states that CPN "has never been included in the industry
10 standard Category 11-01-XX EMI billing record for wireless originated traffic"
11 (page 10, line 5); and that CPN "was never part of AMA" and is "not available"
12 for the creation of EMI records (page 10, line 9); and that CPN is not a required
13 field in EMI category 11-01-XX records (page 20, line 21). Clearly, as reflected
14 in his own Schedule 5, these statements by Mr. Read are not applicable to IXC
15 carried Feature Group "A", "B", or "D" access recordings because the "From
16 Number" appears in bit positions 15 to 24 of the Category 11-01-XX record for
17 IXC access traffic. Such statements form the basis for my conclusion that Mr.
18 Read's statements are applicable only as they pertain to wireless-originated traffic
19 that traverses the LEC network.

20 **Q. Does Mr. Constable's testimony provide clarification on the**
21 **apparent disparity between the conclusions drawn by Mr. Schoonmaker and**
22 **Mr. Read?**

1 A. Yes, significant clarity can be found in Mr. Constable's testimony.

2 In particular, beginning at line 6, on page 9, of Mr. Constable's Direct Testimony
3 he describes how the switches of local exchange carriers use unique AMA
4 (Automatic Message Accounting) standards for the different types of
5 compensable calls occurring over the network. Mr. Constable describes the role
6 of Telcordia in establishing the switch standards, and the role of the Ordering and
7 Billing Forum ("OBF") in establishing the EMI standards. His testimony
8 expresses the need for consistency among the two standards bodies. In doing so,
9 Mr. Constable's testimony demonstrates how both Mr. Schoonmaker and Mr.
10 Read can offer the same data, and seemingly reach different conclusions. One
11 witness, Mr. Schoonmaker, observes the data from the general standpoint of
12 wireless-originated access traffic, and questions why CPN is not similarly
13 recorded for wireless-originated reciprocal compensation traffic. This
14 observation is lacking because it focuses on EMI standards for wireless-originated
15 access traffic on the one hand, while ignoring AMA switch recordings for
16 wireless-originated LEC traffic on the other hand. The other witness, Mr. Read,
17 observes the data from the general standpoint of wireless-originated reciprocal
18 compensation traffic, and questions the need for CPN to be recorded in that
19 environment, even though wireless CPN is recorded for IXC access traffic. This
20 observation is lacking because it focuses on both AMA and EMI recordings for
21 wireless-originated LEC traffic on the one hand, while ignoring AMA and EMI
22 recordings for wireless-originated IXC traffic on the other hand. In my view, the
23 testimony of each witnesses somewhat neglects to give a complete picture of the

1 unique manner in which the Telcordia and OBF documents are used for proper
2 Category 11-01-XX record creation. Mr. Constable's testimony describes the
3 importance of applying each set of standards to the process.

4 **Q. Would it have been helpful if in their testimony Messrs.**
5 **Schoonmaker, Read, and Constable would have been more specific in**
6 **referring to either "IXC" traffic or "LEC" traffic?**

7 A. Yes, in my opinion it would have. As previously stated, 4 CSR
8 240-29.010 (15) and (19) place a distinct difference between the two traffic types.
9 The distinction is absolutely necessary and, in my view, there is a strong
10 likelihood for confusion if the distinctions are not maintained.

11 **Q. Mr. Constable makes statements such as: "[T]hose [AMA and**
12 **Telcordia] standards also do not require the inclusion of CPN in the AMA**
13 **recordings for wireless-originated calls." What is your response?**

14 A. As demonstrated in Case No. TT-2004-0542, such is clearly not
15 the case for the IXC access traffic occurring over Feature Group trunks. Mr.
16 Constable was a participant in Case No. TT-2004-0542 and I would caution
17 against taking any single statement of his testimony outside the complete text.

18 **Q. Does this conclude your Rebuttal Testimony?**

19 A. Yes, it does.