

Exhibit No.:
Issue: Remote Call Forward
Witness: Ralph P. Teasley
Sponsoring Party: CenturyTel of Missouri, LLC &
Spectra Communications
Group, LLC d/b/a CenturyTel
Type of Exhibit: Direct Testimony
Case No.: TC-2007-0307
Date Testimony Prepared: May 18, 2007

CENTURYTEL OF MISSOURI, LLC
and
SPECTRA COMMUNICATIONS GROUP, LLC
d/b/a "CENTURYTEL"

DIRECT TESTIMONY

OF

RALPH P. TEASLEY

CASE NO. TC-2007-0307

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of CenturyTel of Missouri,)
LLC and Spectra Communications Group,)
LLC d/b/a CenturyTel Tariff Filings to)
Grandfather Remote Call Forward Services)
To Existing Customers and Existing)
Locations.)


Case No. TC-2007-0307
Tariff Nos. JI-2007-0498
JI-2007-0499

AFFIDAVIT OF RALPH P. TEASLEY

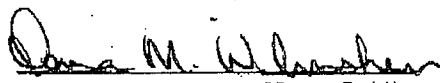
STATE OF MISSOURI)
) ss.
COUNTY OF ST. CHARLES)

I, Ralph P. Teasley, of lawful age and being duly sworn, state as follows:

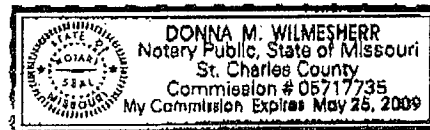
1. My name is Ralph P. Teasley. I am presently Manager of Network Support Centers for CenturyTel Service Group, LLC.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony in the above-referenced case.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge, information and belief.


Ralph P. Teasley

Subscribed and sworn to before me this 18th day of May, 2007.


Notary Public

My Commission expires: May 25, 2009
(SEAL)



DIRECT TESTIMONY

OF

RALPH P. TEASLEY

CASE NO. TC-2007-0307

IDENTIFICATION OF WITNESS

Q. Please state your name and business address.

A. My name is Ralph P. Teasley. My business address is 1151 CenturyTel Drive, Wentzville, Missouri 63385.

Q. Please state your current employment and on whose behalf are you testifying in this proceeding.

A. I am the Manager, Network Support Centers for CenturyTel Service Group, LLC; and I am testifying on behalf of CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel (referred to collectively as “CenturyTel”) in this proceeding.

Q. Please describe your educational background and business/regulatory experience.

A. I have a Bachelor of Arts degree in Business Administration from Lindenwood University, St. Charles, Missouri, and an Associates Degree in Electronics Engineering Technology from the Institute of Electronics Technology in Paducah, Kentucky. I have also completed numerous vendor specific training courses for field service engineering, hardware and software maintenance, operations and administration, and complex translations for our central office equipment from vendors such as Nortel, Lucent, Siemens, Telcordia (formerly Bellcore), etc. I have 36 years of experience in the

1 telecommunications industry as of June 2007, with most of that time spent in a network
2 operations environment. I previously worked for Contel, GTE, and Verizon before
3 joining CenturyTel in 2002 as the result of CenturyTel's acquisition of Verizon's
4 properties in Missouri.

5 **Q. What are your responsibilities as Manager of Network Support Centers for**
6 **CenturyTel Service Group?**

7 A. I am responsible for the daily operational duties of CenturyTel's Network Support Center
8 in Wentzville, Missouri. The center is responsible for establishing standards for switching
9 software structure, performing complex translations, performing database administration
10 functions, such as updating routing for local and optional calling plans, monthly code
11 administration updates on all wire line networks; establishing, augmenting, and
12 disconnecting public and private trunk groups, and providing technical support for
13 switching, routing, and business services issues to all wire line field personnel.

14 **PURPOSE OF TESTIMONY**

15 **Q. What is the purpose of your testimony?**

16 A. The purpose of my testimony is to provide an understanding of how Remote Call
17 Forward services function on the CenturyTel network and to provide support for the
18 reasons that CenturyTel has decided to grandfather this service. I also will present some
19 specific examples of how Socket Telecom, LLC ("Socket") is using the Remote Call
20 Forward service to ultimately bypass toll charges on our network. In these same
21 examples, I will present additional testimony of how Socket is using porting of the
22 Remote Call Forward number as a means of subsequently and improperly allowing
23 multiple calls to a single number simultaneously when they assign the number to its

1 affiliate Internet Service Provider as a dial-up number for Internet connection. Finally, I
2 will demonstrate that the manner in which Socket is employing Remote Call Forward
3 service can and will lead to network congestion to the detriment of all end user
4 customers.

5 **Q. How does the Remote Call Forward service work?**

6 A. Remote Call Forward ("RCF") service allows a customer to have a local service number
7 in a specific exchange and to have calls coming to that number be automatically
8 forwarded to a predetermined number designated by the RCF customer.

9 **Q. Is the Remote Call Forward service available so that customers can bypass toll**
10 **charges?**

11 A. No, the RCF service offered by CenturyTel specifically restricts a customer's ability to
12 use the service as a means to bypass toll charges. This restriction is described in detail in
13 CenturyTel's tariff. For example, customers cannot set up RCF service to a number in an
14 exchange that is within CenturyTel's extended area service (EAS) and have calls to this
15 answering number also forwarded to yet a third number within that exchange's extended
16 area service in order to circumvent toll. Calls forwarded to a number outside of the local
17 calling area of the original number do incur toll charges that are billed to the RCF
18 customer.

19 **Q. Does the Remote Call Forward service offered by CenturyTel allow customers to**
20 **make multiple telephone calls to a single number simultaneously?**

21 A. No, the RCF service offered by CenturyTel specifically restricts a customer's ability to
22 use the number for more than one telephone call at a time. This restriction is described in

1 CenturyTel's tariff. RCF numbers are programmed to forward one call at a time because
2 each forwarded call is tying up an individual call path on the network.

3 **Q. If CenturyTel is allowed to grandfather the Remote Call Forward service, would**
4 **this prevent Socket from offering this same service to its customers?**

5 A. No. The only thing that grandfathering the RCF service tariff would prevent is the future
6 sale or resale of CenturyTel RCF service to new customers. Socket could obtain its own
7 numbering resources and provide this service to its customers on its own. In fact it has
8 already obtained numbering resources in some exchanges.

9 **Q. Please describe the general manner in which Socket is using CenturyTel's Remote**
10 **Call Forward service?**

11 A. In general, Socket Internet purchases a RCF service line and then requests that the line be
12 forwarded to Socket's own toll-free or 8XX Customer Service number. In some
13 instances, Socket has purchased a RCF service line and forwarded that line to a
14 Columbia, Missouri number that is assigned to Socket employee Matt Kohly. Shortly
15 after the RCF service line is installed, Socket Telecom, LLC will request to port the
16 number from CenturyTel on behalf of its affiliate, Socket Internet. Once the RCF
17 number is ported, the number is usually and subsequently terminated to an Internet
18 Service Provider ("ISP") modem, where it allows multiple customer calls to have
19 simultaneous access to the modem.

20 **Q. Can you provide a specific example of what you just described?**

21 A. In Bourbon, Missouri, Socket Internet ordered and CenturyTel installed two lines on
22 October 6, 2006, that were RCF'd to Socket's Customer Service number, 888-720-4045.
23 Both of these numbers were ported out via Socket's Location Routing Number ("LRN"),

1 314-584-1111. The LRN identifies the actual switch the ported number is routed to. One
2 of the numbers, 573-732-3078, appears to be used for Socket Internet's dial-up modems,
3 and the other number, 573-732-3239, goes to Socket's Customer Service. The calls to
4 these numbers before they were ported were routed as toll over the tandem trunk group
5 #103 when forwarded to the 888-720-4045 number. The calls to these numbers now
6 route over the tandem trunk group #103 as local based on the LRN, but should not be
7 local because the customer is not located in the local calling area.

8 **Q. Do you have other examples?**

9 A. Yes. In Leasburg, Missouri, Socket Internet ordered and CenturyTel installed two lines
10 on October 6, 2006, that also were RCF'd to Socket's Customer Service number, 888-
11 720-4045. Both of these numbers were ported out via Socket's LRN, 314-584-1111.
12 One of the numbers, 573-245-6142, appears to be used for Socket Internet's dial-up
13 modems, and the other number, 573-245-6122, goes to Socket's Customer Service. The
14 calls to these numbers before they were ported were routed as toll over the tandem trunk
15 group #103 when forwarded to the 888-720-4045 number. The calls to these numbers
16 now route over the tandem trunk group #103 as local calls based on the LRN but should
17 not be local because the customer is not located in the local calling area.

18 Also, in Cuba, Missouri, Socket Internet ordered and CenturyTel installed two
19 lines on October 6, 2006, that also were RCF'd to Socket's Customer Service number,
20 888-720-4045. Both of these numbers were ported out via Socket's LRN 314-584-1111.
21 One of the numbers, 573-885-0254, appears to be used for Socket Internet's dial-up
22 modems, and the other number, 573-885-0194, goes to Socket's Customer Service. The
23 calls to these numbers before they were ported were routed as toll over the tandem trunk

1 group #100 when forwarded to the 888-720-4045 number. The calls to these numbers
2 now route over the tandem trunk group #100 as local calls based on the LRN but should
3 not be local because the customer is not located in the local calling area.

4 **Q. How do these situations create problems for CenturyTel's network and its**
5 **customers?**

6 A. As I stated previously with regard to the Bourbon, Missouri situation, there are several
7 problems with this arrangement:

8 (1) Calls to either number were previously limited to one call at a time when
9 programmed for RCF service compared to calls to ported numbers that are limited only
10 by the capacity of the network that all of our customers' calls are routed over and the
11 terminating facilities.

12 (2) Once these numbers are ported out of our switch, the calls will route over
13 a direct trunk group to Socket (if one exists), or in most cases, over the toll tandem trunks
14 (since few direct groups do exist). This creates additional volume on these trunks that
15 they are not designed to carry. For example, Socket's porting of an ISP's number with
16 120 trunks¹ and requiring that traffic to now be sent via a toll tandem trunk group that has
17 only 96 trunks to serve all CenturyTel customers in that exchange would obviously result
18 in severe blockage for all customers. In such a case, the toll tandem trunk group becomes
19 instantly full and results in blocked calls for CenturyTel customers attempting to make
20 toll calls as well as calls to the ISP service. There are also a couple of instances where
21 exchanges that do not have 911 Public Safety Answering Points, or PSAPs, route 911
22 calls to a toll free 8XX number for emergency responders. We refer to this as "pre-basic

¹ This specific ISP traffic actually required 121 trunks according to traffic studies; one more trunk than in service.

1 911". This 8XX number is routed over the toll tandem trunks. Routing Socket's ISP
2 traffic over the same toll tandem trunks could potentially block this pre-basic 911 traffic
3 as well. Socket's blocking of pre-basic 911 traffic could result in real harm to a
4 CenturyTel customer. And the only way to eliminate the congestion or blockage in these
5 situations is for CenturyTel to augment the toll tandem trunk group at our expense and
6 for the sole reason that Socket is improperly manipulating the system to put its ISP traffic
7 on our toll tandem trunks without incurring toll expenses, or making network investments
8 of its own.

9 (3) Access charges were previously billed to the Inter-exchange Carrier
10 ("IXC") that transports the toll-free call when calls were being forwarded to Socket's
11 toll-free number. Porting the number allowed Socket to avoid the expense of paying for
12 toll-free service, switching and other access charges for their own customer support
13 functions while improperly shifting the cost to CenturyTel of transporting these calls
14 from CenturyTel's central office to the tandem – in addition to CenturyTel's loss of
15 access revenue.

16 (4) In a similar manner, porting numbers that were previously forwarded to
17 their affiliated ISP allows Socket to avoid the cost of providing toll-free numbers for
18 Internet access while shifting the cost to CenturyTel of transporting ISP calls from
19 CenturyTel's central office to the tandem – in addition to CenturyTel's loss of access
20 revenue.

21 (5) Socket's avoided costs shift substantially more expense to CenturyTel
22 when the numbers are ported, compared to RCF, because calls to ported numbers are
23 limited only by the capacity of the network the calls are routed over and the terminating

1 facilities; *i.e.*, calls to these ported numbers are no longer limited to one call at a time as
2 they were with RCF service and now multiple calling paths can be simultaneously tied up
3 instead of just one calling path.

4 **Q. Are you aware of any Socket orders for Remote Call Forward service following**
5 **CenturyTel's filing of its tariff to grandfather this service?**

6 A. Yes, shortly after the tariff to grandfather the RCF service was filed, it is my
7 understanding that Socket Telecom, LLC attempted to order approximately 61 additional
8 Remote Call Forward service lines, as Arthur Martinez testifies in his direct testimony.

9 **Q. Do you know if Socket found a way to obtain additional Remote Call Forward**
10 **service lines after CenturyTel refused to fill the request for 61 additional lines?**

11 A. It is my understanding that on February 15, 2007, someone called our retail Customer
12 Service and ordered a line installed in Troy, Missouri under Matt Kohly's name, and then
13 RCF'd that line to 636-256-1130. This is unusual for several reasons, one of which is the
14 fact that Socket should call their assigned CenturyTel Account Representative to order
15 these services if they are to be used for business reasons. This number has a May 18,
16 2007 porting date. Once the number is ported, the call will route, based on Socket's
17 LRN, to their direct trunk group #1101. In another instance in Licking, Missouri, a line
18 was installed under Matt Kohly's name on February 15, 2007 and RCF'd to 573-256-
19 1130, a voice mail service. This number also is to be ported on May 18, 2007. Once the
20 number is ported, the call will route, based on Socket's LRN, to their direct trunk group
21 #230.

22 **Q. Can you explain how Socket's use of CenturyTel's Remote Call Forward service**
23 **allows them to bypass toll charges?**

1 A. Porting the number allows Socket to avoid the expense of paying for toll-free service for
2 interexchange calls to its own customer support functions while shifting the cost to
3 CenturyTel of transporting these calls from CenturyTel's central office to the tandem.
4 This occurs because customers are dialing a local number that previously was RCF'd to a
5 toll-free number but now has been ported as a non-RCF "local" number. In a similar
6 manner, porting numbers that were forwarded to their affiliated ISP allows Socket to
7 avoid the cost of providing toll-free numbers for Internet access while shifting the cost to
8 CenturyTel of transporting ISP calls from CenturyTel's central office to the tandem.

9 **Q. Does this conclude your direct testimony?**

10 A. Yes it does.