

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: Surrebuttal Testimony
Case No.: TC-2007-0307
Date Testimony Prepared: July 30, 2007

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

SURREBUTTAL 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 Surrebuttal 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.



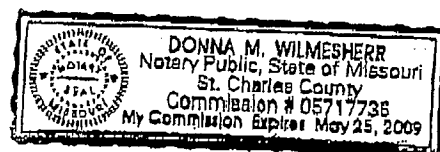
Ralph P. Teasley

Subscribed and sworn to before me this 30th day of July, 2007.



Notary Public

My Commission expires: May 25, 2009
(SEAL)



1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **RALPH P. TEASLEY**

4 **CASE NO. TC-2007-0307**

5

6 **IDENTIFICATION OF WITNESS**

7 **Q. Please state your name and business address.**

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

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

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

16 **Q. Are you the same Ralph P. Teasley who submitted direct testimony on behalf of**
17 **CenturyTel on May 21, 2007 and rebuttal testimony on July 6, 2007?**

18 A. Yes.

19 **PURPOSE OF TESTIMONY**

20 **Q. What is the purpose of your surrebuttal testimony?**

21 A. The purpose of my testimony is to rebut certain assertions made by Mr. R. Matthew
22 Kohly in his rebuttal testimony filed on July 6, 2007, on behalf of Socket Telecom, LLC
23 and Socket Internet herein collectively referred to as "Socket" unless expressly named.

1 **Q. On page 11, lines 12-13 of his rebuttal testimony, Mr. Kohly asserts that you and**
2 **Mr. Martinez have failed to point to any evidence that porting Socket Internet's**
3 **RCF numbers to Socket Telecom have caused blockage to CenturyTel's network.**
4 **Can you respond to this assertion?**

5 **A. While it is true that my direct testimony did not contain a specific example that porting**
6 **any such a number has caused blockage on CenturyTel's network, page 3, lines 7-18 of**
7 **my rebuttal testimony detailed an occurrence of network blockage due to the porting of**
8 **Socket Internet's RCF number to Socket Telecom in Rockville, Missouri. In that**
9 **instance, after Socket Internet pointed ISP dial-up traffic to the RCF number,**
10 **CenturyTel's network began to experience blockage. CenturyTel had to reroute this ISP**
11 **dial-up traffic to a larger trunk group and transport it approximately 67 miles to Embarq's**
12 **tandem in Warrensburg, Missouri to stop blocked toll calls due to the tandem trunk group**
13 **being grossly overloaded by inappropriate Socket Internet traffic. Mr. Kohly would**
14 **apparently have the Commission believe that you must actually obtain the results of**
15 **closing I-70 without warning before you can state that doing such would cause a traffic**
16 **jam.**

17 **Q. In his rebuttal testimony,¹ Mr. Kohly accused you of making "incredibly**
18 **misleading" statements in your direct testimony regarding porting RCF numbers**
19 **because you only described a situation where porting an ISP number would cause**
20 **very real network blockage. Why did you cite this example?**

21 **A. My direct testimony beginning on page 8, line 15 and continuing through page 9 lines 1-**
22 **8, clearly gives an example of an Internet Service Provider number being ported, not an**

¹ Kohly Rebuttal Testimony, page 11, lines 13-17, through page 12, lines 1-3.

1 RCF number. The example I gave of ISP traffic being placed on the common toll trunks
2 is very relevant, since the type of traffic is exactly the same (ISP-bound traffic) that
3 Socket intends to shift to the RCF numbers at issue in this case, once they are ported.
4 And the only reason Socket wants to do that is to shift the cost of transport and facility
5 augmentation to CenturyTel so that CenturyTel inappropriately bears the burden of
6 providing service to Socket customers.

7 My direct testimony that describes the problems with placing ISP-bound traffic on
8 the common trunk group, disrupting pre-basic 911 service, disrupting calls placed by both
9 CenturyTel *and* Socket customers (and sometimes Embarq and AT&T customers), gave a
10 very clear, real-world example of how ISP-bound traffic causes network congestion. The
11 point of the example is that at least one of the RCF numbers was assigned to Socket's ISP
12 modems, which Mr. Kohly does not deny, and which we have confirmed by dialing the
13 number and reaching a modem tone. RCF programming limited the calls to one call at a
14 time prior to porting. Porting the RCF number would immediately eliminate the one-call
15 limit and allow multiple calls to be routed simultaneously over CenturyTel's tandem
16 trunk group, since Socket typically does not have a direct trunk group. The number of
17 calls routed after porting depends upon how soon Socket instructs its customers to start
18 dialing the "new" number. The number of calls can grow very rapidly on a daily basis.

19 **Q. On page 13, lines 1-12, Mr. Kohly asserts that the traffic volumes from the ported**
20 **RCF numbers in Bourbon, Cuba and Leasburg were not high enough in May to**
21 **cause blockage on CenturyTel's network. Do you agree with his statement?**

22 **A.** Mr. Kohly's testimony is misleading. It is probably true that there was no blockage on the
23 day the RCF number was ported to Socket. I seriously doubt that Socket informed their

1 customers that these RCF numbers existed for the purpose of dial-up Internet service
2 prior to porting them, since Socket would have had to pay per-minute toll charges for the
3 traffic if it were using them for dial-up Internet service. Blockage occurs after the
4 number is publicized for ISP access and the dial-up ISP traffic ramps up. The truth is,
5 Socket Internet would not be interested in CenturyTel's RCF service in the normal course
6 of business. Socket Internet only orders the RCF service numbers at the request of
7 Socket Telecom, for the sole purpose of porting these same numbers to shift the cost of
8 providing service to Socket Internet customers to CenturyTel. Perhaps Socket also does
9 this to avoid the initial administrative time and expense of requesting numbering
10 resources for itself. In either case, it is inappropriate to shift these costs to CenturyTel
11 and its customers.

12 **Q. Can you explain what you mean when you say "blockage occurs after the number is**
13 **publicized for ISP access and the dial-up ISP traffic ramps up"?**

14 **A.** When any dial-up ISP service provider publishes a new dial-up number to its customers,
15 it will take the customers a certain amount of time to change the number that their
16 computer modems automatically dial to gain access to the Internet. What we typically
17 see after a dial-up ISP service provider issues a new number is the gradual shifting of
18 traffic from the old number to the new one, rather than a sudden shift of all the ISP dial-
19 up traffic. In the case of a dial-up ISP service provider that originally purchased direct
20 trunks for its dial-up traffic and then shifted that traffic to CenturyTel's tandem trunks
21 with a new number, such as a ported RCF service number, the ISP could decommission
22 its direct trunks and shift all of its transport costs to CenturyTel.

1 **Q. How is this relevant to Socket Internet requesting RCF service numbers and then**
2 **requesting the numbers be ported to Socket Telecom?**

3 A. Traffic to a ported RCF number can be shifted in the same manner, since multiple calls to
4 a ported number will be routed simultaneously, versus only one call at a time under
5 CenturyTel's RCF tariff restriction.

6 **Q. Do you believe that Mr. Kohly's chart, MK-1, on page 13 of his rebuttal testimony,**
7 **accurately reflects what the peak usage for the individual trunks was in the**
8 **Bourbon, Cuba and Leasburg exchanges?**

9 A. I cannot verify what Mr. Kohly put in his chart. CenturyTel uses real traffic studies,
10 designed with industry-standard methodologies, to show the impact of dial-up traffic on
11 CenturyTel's network. CenturyTel has standard procedures in place that could provide
12 these studies and the verifiable switch data used.

13 **Q. Is there anything else in Mr. Kohly's rebuttal testimony that you disagree with?**

14 A. Well, I disagree with most of Mr. Kohly's rebuttal testimony, but I will leave the policy
15 issues for Mr. Martinez to respond to. I would point out that on page 12, lines 6-7 of Mr.
16 Kohly's rebuttal testimony where he is referring to the Willow Springs example I gave,
17 he states, "[t]his was an instance where the customer was purchasing five ISDN-PRIs,
18 each with 24 DS0s, from CenturyTel." This statement is incorrect. The switch in Willow
19 Springs is not technically capable of providing ISDN-PRI service. Socket Internet
20 actually is subscribing to CyberDS1 service.

21 **Q. Does that conclude your surrebuttal testimony?**

22 A. Yes it does.