

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

In the Matter of a Possible Amendment        )  
To Section 4 CSR 240-29.040                    )        **Case No. TX-2006-0444**

**COMMENTS OF CENTURYTEL OF MISSOURI, LLC**

CenturyTel of Missouri, LLC ("CenturyTel"), in response to the Commission's *Notice Opening Case, Inviting Comments and Issuing Protective Order* ("Notice") issued in this matter on May 24, 2006<sup>1</sup>, respectfully submits the following Comments and requests the Commission find it unnecessary to amend 4 CSR 240-29.040 to require inclusion of CPN in the Category 11 billing records exchanged between telecommunications carriers for calls wireless carriers directly terminate to the LEC network.

In its Notice, the Commission outlined six questions to which they invited any interested person to file comments, as follows:

1. Why would a terminating carrier need CPN for wireless calls in the Category 11 records if the carrier receives CPN contemporaneous with the call?
2. Is it possible for a terminating carrier to reconfigure its equipment to collect the CPN in lieu of receiving it in a Category 11 record? If so, at what cost?
3. How much revenue have terminating carriers lost because wireless CPN has not been included in the Category 11 records? How was that revenue number calculated? What percentage of overall revenue is that "lost" revenue number?
4. Why are wireless calls treated differently from wireline calls in relation to CPN in the Category 11 records?
5. What is the estimated cost to the transiting carrier to reconfigure its equipment to capture a wireless CPN for the Category 11 records?
6. What is the estimated time frame within which such reconfiguration is practicable?

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<sup>1</sup> By its *Order Establishing Deadline for Submission of Information* issued on June 21, 2006, the Commission ordered that the deadline for the filing of comments is July 7, 2006.

CenturyTel respectfully concurs in the Comments filed herein by AT&T Missouri in response to Questions 1, 2 and 4. Whereas Question 3 relates to specific information concerning terminating carriers, CenturyTel does not have sufficient knowledge to formulate a response thereto. As stated in the Rebuttal Testimony of CenturyTel witness Arthur P. Martinez in Case No. TE-2006-0053, "the Rule's provisions allow carriers to mutually agree to exchange other types of billing records."<sup>2</sup> CenturyTel has not been approached by either Peace Valley Telephone Company or Alltel Missouri, Inc., the only two independent incumbent local exchange companies subtending CenturyTel's network, regarding any changes to the billing records historically utilized." Accordingly, CenturyTel has not ascertained the information requested in Questions 5 and 6.

Respectfully submitted,

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<sup>2</sup> 4 CSR 240-29.040(4)(B).

## CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on July 7, 2006:

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