

**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

AFFIDAVIT OF JASON E. CONSTABLE

STATE OF TEXAS)
) SS
COUNTY OF DALLAS)

I, Jason E. Constable, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Jason E. Constable. My business address is Three AT&T Plaza, 308 South Akard, Room 720, Dallas, Texas 75202. I am employed by AT&T Operations, Inc. as an Area Manager-Switching/Emerging Technologies. Attached as Constable-Schedule 1 is an exhibit providing information regarding my employment, educational background and appearances before the Missouri Public Service Commission ("Commission").

Executive Summary

2. My affidavit is intended to provide information responsive to questions five and six from the Commission's Notice Opening New Case, Inviting Comments and Issuing Protective Order in Case No. TX-2006-0444, issued May 24, 2006:
 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?

AT&T Missouri does not have the ability to include Calling Party Number ("CPN") in the Category 11 EMI billing record because AT&T Missouri's Lucent 5ESS tandem switches do not have the technical capability of capturing CPN in the Automatic Message Accounting ("AMA") switch recordings on calls terminating to the LEC network over type 2A wireless trunk groups. In its September, 2005 letter, the manufacturer has estimated that it will cost between \$900,000 and \$1.3 million and take between six to 12 months to develop that technical capability for its 5ESS tandem switches from a signed agreement, which could take up to 30 days to negotiate. A "Highly Confidential" copy of Lucent's planning offer covering the development of this new functionality is attached to my affidavit as Constable-Schedule 2(HC).

In addition, AT&T Missouri would be required to make very substantial and burdensome changes to its internal information processing systems used to generate intercompany billing records to include CPN in the Category 11 record for calls terminated by wireless carriers over type 2 wireless trunk groups to the LEC network (the specific work that would be

necessary to implement these changes to AT&T Missouri's information processing systems is described in a separate affidavit from Chris Read, Senior Business Manager for AT&T Services, Inc.).

Background

3. "CPN" stands for "Calling Party Number." The FCC has defined CPN as "the subscriber line number or the directory number contained in the calling party number parameter of the call set-up message associated with an interstate call on a Signaling System 7 [SS7] network."¹ CPN is valuable for providing Caller ID services as well as assisting in lawful intercepts and 911 services.
4. Automatic Message Accounting ("AMA") is the network functionality that measures, collects, formats and outputs subscriber network-usage data to billing and other operations systems. More simply stated, it is the process by which the switching system generates call detail information, which can then be extracted and processed as a primary input into EMI billing records which carriers use to bill other carriers for their use of network services and capabilities.² AMA records are generated by AT&T Missouri's tandems and end office switches. Once generated by the network, the AMA records are fed into, and processed by, AT&T Missouri's downstream billing systems.
5. The three Lucent 5ESS™ tandem switches used by AT&T Missouri (Lucent 5ESS tandem switches are also used by many other carriers), were originally designed in accordance with industry standards to not capture and populate CPN in the AMA records for calls terminating to the LEC network over wireless carrier trunk groups. Two of these tandems are located in St. Louis with the third located in Moberly. These three 5ESS™ tandems handle about half of the traffic AT&T Missouri tandems in the state. AT&T Missouri also has six Northern Telecom DMS-100/200™ tandem switches located in Kansas City, Sikeston, Chillicothe, Kirksville, Springfield and St. Joseph that handle the other half of the traffic AT&T Missouri tandems.³ The DMS-100/200™ tandems do contain a software feature that would allow AT&T Missouri to capture CPN in the AMA recordings they make for calls terminated over wireless carrier trunk groups. However, this feature has never been activated or fully tested. Thorough testing would be required to ensure that the feature functions appropriately in capturing the CPN information and does not interfere with other data processing functions or adversely impact other AMA recordings.
6. Even if AT&T Missouri's switches could capture and generate CPN in the AMA recordings on such calls, AT&T Missouri does not have processing in place that is capable of creating an EMI Category 11-01-XX billing record that includes CPN on these wireless calls. The current inability of our processing systems to create such a record and what it would take to develop that capability in our systems are described by Mr. Chris Read in a separate affidavit.

¹ 47 C.F.R. Section 64.1600(c).

² Carriers also create AMA records to provide input information for billing their own end users.

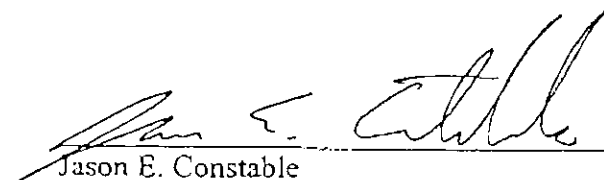
³ These figures do not include tandems which only provide a specific purpose such as tandeming 8xx traffic or Operator Services/ Directory Assistance calls.

**Lucent's Development of New Technology to Capture CPN
in AMA Switch Records for Terminating Wireless Traffic**

7. As previously mentioned, the Lucent Technologies 5ESS™ tandems do not have the technical ability to populate CPN in the AMA switch records for terminating type 2A wireless calls and Lucent would be required to develop this functionality as a new capability in its 5ESS™ switches. AT&T Missouri requested Lucent to provide an estimate of the cost and time to develop this capability for its 5ESS tandem switches. Lucent responded that such a function would require new development for which it estimated that the costs could range from \$900K - \$1.3M. A copy of Lucent's feature development estimate dated September 29, 2005, is attached to my testimony as Constable-Schedule 2 (HC). As this estimate is nearly a year old, it is possible that Lucent's current cost to develop this new feature would be higher. This cost estimate does not include the additional costs that AT&T Missouri would incur to load and test the new software package, or the costs AT&T Missouri would incur in its processing systems.
8. In its response, Lucent estimated the availability of the new feature to be approximately 6-12 months from a signed agreement. Such an agreement could take up to 30 days to negotiate. These time estimates do not include the time and cost required by AT&T Missouri to load and test the new software package. It must also be recognized that these cost and availability estimates are based on Lucent's September 2005 response which was a high-level response only and, since a contract has not been signed, contained no firm commitments.
9. This concludes my affidavit.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

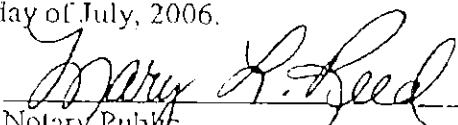
Executed on July 6, 2006:



Jason E. Constable
Area Manager-Switching/Emerging Technologies
AT&T Operations, Inc.

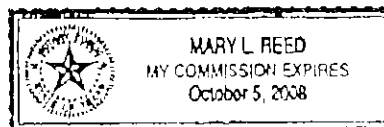
STATE OF TEXAS)
) SS
COUNTY OF DALLAS)

Subscribed and sworn to before me this 6th day of July, 2006.



Notary Public

My Commission Expires: October 5, 2008



SUMMARY OF EDUCATION AND WORK EXPERIENCE

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

- A. I received an Associate Degree in the Arts from Tulsa Community College, and a Bachelors Degree in Elementary Education, with Magna Cum Laude honors, from Langston University.

Q. PLEASE OUTLINE YOUR WORK EXPERIENCE.

- A. I have performed a variety of telecommunications network-related jobs, including working for eight years in AT&T's Network Operations Department. I started as a Tier 1 hardware maintenance technician for various end office switches for nine months until I was promoted into management. I then spent two years simultaneously managing two crews responsible for resolving troubles associated with AT&T's Signaling System 7 (SS7), Local Number Portability (LNP) and Advanced Intelligent Network (AIN) networks; and a team of switch software technicians who proactively sought and corrected switch translations errors associated with routing and billing. I have also worked two years as a system administrator and Tier 2 support for AT&T Missouri's call related databases, including AIN, Line Information Database (LIDB), and 800. In each of these positions, I have received numerous training courses from Telcordia and various telecommunications equipment vendors including:

- TCP/IP Architecture from IBM
- ISCP Operations
- 5ESS Switching Translations Routing and Charging
- Access Signaling System 7

- AIN Network Operations and Maintenance
- LNP Local Number Portability Operations
- Ericsson AXE Basic Methods of Operation
- DMS-100 Operations and Maintenance
- Principles of Digital Transmission
- Network Fundamentals

Prior to my service with AT&T I also built, programmed, and repaired small PBX systems for the Xeta Corporation, as well as taught AC, DC, and Solid State electronics at a vocational institute.

Q. PLEASE EXPLAIN YOUR CURRENT JOB DUTIES AND RESPONSIBILITIES.

A. I am responsible for advising and supporting the SBC network organization on regulatory issues, including developing network policies, negotiating interconnection agreements, providing network support for teams implementing regulatory mandates, and testifying in regulatory proceedings. I also assist in developing corporate planning associated with switching, SS7, call-related databases, 911, OS/DA, and new technologies, including Internet Protocol (“IP”)-based technologies and services.

Q. HAVE YOU PREVIOUSLY PARTICIPATED IN OTHER REGULATORY PROCEEDINGS?

A. Yes, I have participated in numerous dockets including:

- The Texas T2A successor, ICA Arbitration, Docket D28821
- SBC Indiana MCI / ICA Arbitration, Docket 04-0469

- SBC California / AT&T ICA Arbitration, Dockets U 1001 C, U 5002 C, U 5462 C, U 5389 C, & U 5454 C
- SBC Indiana / AT&T ICA Arbitration, Docket 40571-INT04
- SBC Connecticut / Level 3 ICA Arbitration, Docket ADJ:VYM
- SBC Wisconsin / AT&T ICA Arbitration, Docket 05-MA-136
- The Oklahoma O2A successor, ICA Arbitration, Docket PUD200400492
- The Kansas K2A successor, ICA Arbitration, Dockets 05-BTKT-365-ARB, 05-AT&T-366-ARB, 05-TPCT-269-ARB, 05-NVTT-370-ARB
- SBC Kansas / TelCove ICA Arbitration, Docket 05-ABIT-507-ARB
- The Missouri M2A successor, ICA Arbitration, Docket TO-2005-0336
- SBC California / MCI ICA Arbitration, Docket U 1001 C
- SBC Wisconsin / MCI ICA Arbitration, Docket 05-MA-138
- The Arkansas A2A successor, ICA Arbitration, Docket 05-081-U
- SBC Indiana / MCI ICA Arbitration, Docket 42893-INT-01
- SBC Arkansas / Xspedius ICA Dispute, Docket 04-169-C
- AT&T Missouri CPN Waiver Proceeding, Case No. TE-2006-0053