

Exhibit No:
Issues: Calling Party Number ("CPN")
Witness: Jason E. Constable
Type of Exhibit: Direct Testimony
Sponsoring Party: Southwestern Bell Telephone , L.P.,
d/b/a AT&T Missouri
Case No: TE-2006-0053

SOUTHWESTERN BELL TELEPHONE , L.P.,
D/B/A AT&T MISSOURI

CASE NO. TE-2006-0053

DIRECT TESTIMONY

OF

JASON E. CONSTABLE

Dallas, Texas

March 24, 2006

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 SBC Missouri, for)
A Waiver of Certain Requirements of 4 CSR)
29.040(4).)

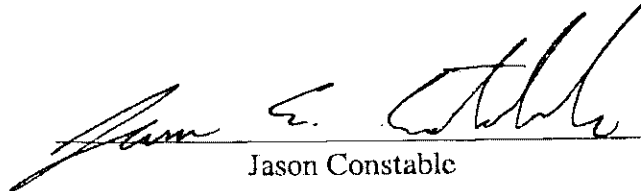
Case No. TE-2006-0053

AFFIDAVIT OF JASON CONSTABLE

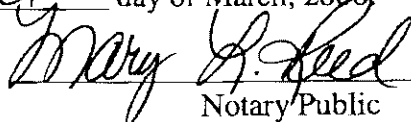
STATE OF TEXAS)
COUNTY OF Dallas) SS

I, Jason Constable of lawful age, being duly sworn, depose and state:

1. My name is Jason Constable. I am presently Area Manager-Switching/Emerging Technology for AT&T Operations, Inc.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.


Jason Constable

Subscribed and sworn to before me this 24th day of March, 2006


Notary Public

My Commission Expires: October 5, 2008



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I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Jason E. Constable. My business address is Three SBC Plaza, 308 South Akard, Room 720, Dallas, Texas 75202.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am employed by AT&T Operations, Inc. as an Area Manager-Switching/Emerging Technologies.

Q. HAVE YOU PREPARED AN EXHIBIT THAT PROVIDES INFORMATION REGARDING YOUR EMPLOYMENT, EDUCATIONAL BACKGROUND AND APPEARANCES BEFORE THE COMMISSION?

A. Yes. That information is attached as Constable-Schedule 1.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony explains, primarily from a network perspective, why Rule 4 CSR 240-29.040(4) of the Commission's Enhanced Records Exchange rules does not, and should not, require the tandem carrier (e.g., AT&T Missouri) to include Calling Party Number ("CPN") as part of the Category 11-01-XX ("Category 11") billing records it provides for wireless-originated calls that transit the tandem provider's network and terminate to other LECs. Imposing a requirement to include CPN in this specific type of billing record would be inconsistent with industry guidelines and costly for AT&T Missouri to

1 implement because of the inherent limitations of the switching equipment AT&T
2 Missouri uses in its network. Imposing such a requirement is also unnecessary because
3 (1) CPN is not a reliable indicator for billing wireless traffic, and (2) AT&T Missouri
4 makes the CPN it receives available for downstream carriers' use on a real-time basis
5 through the signaling AT&T Missouri delivers to them with each call.

6
7 **Q. HOW DOES YOUR TESTIMONY RELATE TO MR. READ'S TESTIMONY?**

8 A. Mr. Read is AT&T Missouri's intercarrier billing record and data processing witness.
9 His testimony will explain that Rule 29.040(4) should not include a requirement to
10 include CPN in Category 11-01-XX records for wireless-originated calls because such a
11 requirement would be inconsistent with industry standards for intercarrier billing records.
12 Specifically, he will describe the industry standard methods AT&T Missouri uses to
13 create the call detail records (e.g., Category 11 records) that the industry uses to bill each
14 other. He explains that when call detail records are exchanged between carriers, the
15 finished records are to conform to an industry standard format known as Exchange
16 Message Interface ("EMI"). As he indicates, these EMI, or call detail records, are created
17 primarily from Automatic Message Accounting ("AMA") data recorded by a carrier's
18 switches and that they also contain other information that is derived from tables in the
19 billing systems. Mr. Read's testimony also describes how the AMA recordings are
20 transformed into EMI records.

1 As AT&T Missouri's network witness, my testimony describes how AT&T Missouri's
2 switches generate AMA records, which are electronic recordings created by the switch by
3 capturing certain information from the call signaling stream as well as information stored
4 within the switch's own computer memory. I also explain what data the switches can
5 place into those AMA records, the specific limitations of AT&T Missouri's Lucent
6 5ESS™ switches, and the industry standards for generating AMA records for wireless-
7 originated traffic.

8
9 **Q. WHAT ARE THE MAIN POINTS OF YOUR TESTIMONY?**

10 **A.** The main points that I make in my testimony are:

- 11 • Nothing in the Commission's Rule 29.040(4) requires tandem carriers to
12 include CPN as part of the Category 11-01-XX record for wireless-
13 originated calls. AT&T Missouri strongly opposes such a requirement
14 because it:
 - 15 ○ Is contrary to industry practices;
 - 16 ○ Is beyond the current technical capability of AT&T Missouri's
17 network;
 - 18 ○ Would require AT&T Missouri to pay Lucent Technologies
19 approximately \$1 million or more to develop that technical
20 capability for AT&T Missouri's Lucent switches, and would
21 require very substantial and burdensome changes to AT&T
22 Missouri's internal information processing systems used to
23 generate intercompany billing records; and
 - 24 ○ Would produce little, if any, benefit for AT&T Missouri or the
25 carriers that terminate the wireless traffic.
- 26 • The only requirements in the Enhanced Record Exchange rules that have
27 any relation to CPN are Rules 29.040(1) and (2), which require
28 "originating caller identification" to be delivered with a call. AT&T
29 Missouri does in fact deliver the originating caller identification (in this
30 case the wireless caller's CPN) when AT&T Missouri receives that
31 information in the SS7 signal and passes that information to the
32
33
34
35

1 terminating carrier over SS7 signaling. However, this is significantly
2 different than requiring CPN to be included in the Category 11-01-XX
3 billing record when the call transits AT&T Missouri's tandem switch.
4 Notably, with one minor exception, AT&T Missouri supported Rules
5 29.040(1) and (2) because:

- 6
- 7 ○ AT&T Missouri follows industry practices, and federal rules which
- 8 require CPN to be signaled with a call when technically feasible;
- 9 and
- 10
- 11 ○ Signaling CPN enables valuable customer services (like Caller ID)
- 12 to function and makes CPN available to carriers on the call path
- 13 that wish to have it.
- 14
- 15
- 16

17 **III. RULE 29.040(4) DOES NOT REQUIRE CPN TO BE INCLUDED IN**
18 **CATEGORY 11 BILLING RECORDS**

19

20 **Q. WHAT IS CPN?**

21 A. "CPN" stands for "Calling Party Number." The FCC has defined CPN as "the subscriber
22 line number or the directory number contained in the calling party number parameter of
23 the call set-up message associated with an interstate call on a Signaling System 7 [SS7]
24 network."¹ CPN is valuable for providing Caller ID services as well as assisting in lawful
25 intercepts and 911 services.

26

27 **Q. DOES RULE 29.040(4) REQUIRE CARRIERS TO INCLUDE CPN IN**
28 **WIRELESS-ORIGINATED BILLING RECORDS?**

29 A. No. Nothing in the rule imposes such an obligation. It merely states that "originating
30 tandem carriers shall, for each compensable call, create and make the following available

¹ 47 C.F.R. Section 64.1600(c).

1 upon request by a terminating carrier, at no charge to the terminating carrier: (A) A
2 category 11-01-XX record.” (emphasis added)

3
4 **Q. WHAT HAS THE COMMISSION SAID ABOUT THIS RULE?**

5 A. In its Order of Rulemaking adopting Rule 29.040(4), the Commission added language
6 stating that “transiting carriers shall include CPN as part of the Category 11-01-XX
7 records created for wireless-originated traffic occurring over the LEC-to-LEC network.”²
8 But in a brief filed with the Cole County Circuit Court, the Commission appears to have
9 corrected itself stating: “the Commission concedes that the single sentence of which SBC
10 Missouri complains is an incorrect statement of what Rule 4 CSR 240-29.040(4) requires.
11 This is so because the Commission now believes that neither a “category 11-01-XX
12 record” nor a “Missouri-specific category 11-01-XX record” must include the CPN for
13 wireless-originated calls.”³

14
15 **Q. WHAT HAS THE COMMISSION’S STAFF SAID ABOUT THIS RULE?**

16 A. Staff is in agreement with AT&T Missouri on this issue and has offered the following
17 assessment: “SBC is correct. Nothing in the rules specifically requires that CPN be
18 placed in the billing record of wireless originated calls. Rather, 4 CSR 240-29.040(4)(A)
19 merely requires that a “category 11-01-XX billing record” be created.”⁴

20
21 **Q. DOES AT&T MISSOURI COMPLY WITH THAT REQUIREMENT?**

² Order of Rulemaking, Mo. Reg. Vol. 30, No. 12 (June 15, 2005) at p. 1389.

³ MoPSC Brief, Cole County Case No. 05AC-CC00732, filed December 9, 2005, page 6.

1 A. Yes. As AT&T Missouri witness Mr. Read explains in more detail, AT&T Missouri
2 provides an industry standard Category 11-01-XX billing record for wireless-originated
3 calls that transit its network and terminate in another carrier's exchange. As discussed by
4 Mr. Read, such records are provided to the terminating carrier in the standard EMI format
5 and contain the information the terminating carrier needs to identify the carrier
6 responsible for payment.

7
8
9 **IV. INDUSTRY STANDARDS DO NOT REQUIRE BILLING RECORDS FOR**
10 **WIRELESS-ORIGINATED CALLS TO CONTAIN CPN**

11
12 **Q. DOES AT&T MISSOURI OPPOSE A FINDING BY THE COMMISSION THAT**
13 **RULE 29.040(4) REQUIRES TANDEM CARRIERS TO PROVIDE THE CPN IN**
14 **CATEGORY 11 BILLING RECORDS ON WIRELESS-ORIGINATED**
15 **TRAFFIC?**

16 A. Yes. AT&T Missouri strongly opposes such a requirement.
17

18 **Q. WHAT IS THE BASIS FOR AT&T MISSOURI'S OPPOSITION?**

19 A. Aside from the fact that Rule 29.040(4) never contained this requirement in the first
20 place, AT&T Missouri opposes such a finding because it: is contrary to industry
21 practices; is beyond the technical capability of AT&T Missouri's network; would require
22 AT&T Missouri to pay Lucent Technologies \$1 million or more to develop that technical
23 capability for AT&T Missouri's Lucent switches and would require very substantial and

⁴ William Voight's Memorandum in response to Commission's Order in the Matter of Missouri Public Service Commission Official Case File, Case No. TE-2006-0053, August 11, 2005, Page 5.

1 burdensome changes to AT&T Missouri's internal information processing systems used
2 to generate intercompany billing records; and would produce little, if any, benefit.

3
4 **Q. WHY WOULD REQUIRING CPN TO BE INCLUDED IN CATEGORY 11-01-XX**
5 **BILLING RECORDS FOR WIRELESS-ORIGINATED CALLS BE**
6 **INCONSISTENT WITH INDUSTRY PRACTICES?**

7 A. Two industry standards apply here and such a requirement would be inconsistent with
8 both of them. The first comes from the Ordering and Billing Forum ("OBF") as it
9 pertains to the content of Category 11-01-XX Exchange Message Interface ("EMI")
10 intercompany billing records. Mr. Read addresses this standard in his testimony and
11 explains that it does not require CPN to be included in the Category 11-01-XX billing
12 record for wireless-originated calls. The other standard comes from Telcordia
13 Technologies, which defines the data content of AMA records that are created by AT&T
14 Missouri's (and other carriers) switches. Those standards also do not require the
15 inclusion of CPN in the AMA recordings for wireless-originated calls.

16
17 **Q. PLEASE DESCRIBE TELCORDIA TECHNOLOGIES AND WHAT IT DOES?**

18 A. Telcordia Technologies, which was formerly known as Bell Communications Research,
19 or "Bellcore," was created during the divestiture of the Bell system in 1984 to provide a
20 center for technological expertise and innovation. Much of the U.S. telecommunications
21 network depends on software invented, developed, implemented or maintained by it.
22 Telcordia holds over 800 telecom patents and is responsible for the development of
23 technologies that enabled telecommunications breakthroughs such as ADSL, ATM,

1 Frame Relay, SONET, AIN ISDN, and end-user services such as three-way calling, call
2 waiting and Caller ID.

3
4 One of the standards Telcordia developed and maintains is the Generic Requirements
5 ("GR") for telecommunications equipment, systems, and services that implement the
6 Telecommunications Act of 1996 ("the Act") directives relative to the development of
7 industry-wide generic requirements relating to telecommunications equipment.
8 Consistent with these goals, Telcordia invites members of the industry to participate in
9 the development process of such GR documents. Of particular interest here is GR-1504
10 (Generic Requirements for Wireless Service Provider (WSP) Automatic Message
11 Accounting (AMA)) which provides the generic requirements for interconnection with
12 WSPs consistent with changes in technology. This document provides generic
13 requirements for the generation of switch AMA records resulting from both switched
14 Multi frequency (MF) and Signaling System 7 (SS7) interconnection between the WSP
15 and the local exchange network.

16
17 **Q. WHAT ARE AMA RECORDS?**

18 A. Automatic Message Accounting (AMA) is the network functionality that measures,
19 collects, formats and outputs subscriber network-usage data to billing and other
20 operations systems. More simply stated, it is the process by which the switching system
21 generates call detail information, which can then be extracted and processed as a primary
22 input into EMI billing records which carriers use to bill other carriers for their use of

1 network services and capabilities.⁵ AMA records are generated by AT&T Missouri's
2 tandems and end office switches. Once generated by the network, the AMA records are
3 fed into, and processed by, AT&T Missouri's downstream billing systems as discussed
4 by Mr. Read in more detail.

5
6 **Q. DOES THE TELCORDIA DOCUMENT PRESCRIBE DIFFERENT STANDARDS**
7 **FOR DIFFERENT TYPES OF CALLS (E.G., IXC-ORIGINATED CALLS AS**
8 **OPPOSED TO WIRELESS-ORIGINATED CALLS)?**

9 A. Yes. For each use of a LEC service that is billable or is of a type for which data is
10 required for one of the ancillary AMA data usage functions (e.g., terminating wireless,
11 terminating IXC, local interconnection, directory assistance, coin, etc.), the standards
12 prescribe what AMA data should be generated by the switch. In addition to standard data
13 items such as the identification of the user, call input (i.e., dialed digits), and time and
14 duration of usage, the AMA records for specific network service usage should contain
15 data specific to that usage. For example, on calls terminating to the LEC network from
16 an IXC, the standard calls for the IXC's Carrier Identification Code (CIC) to be included
17 in the AMA recording. But such information (i.e., the CIC code) would neither be
18 available nor useful for a local call terminating from another LEC, which highlights why
19 different standards exist for different types of traffic. Telcordia, in conjunction with
20 industry participation, provides the requirements for what types of information should be
21 provided in the AMA records generated by the switch for the various uses of a LEC's
22 network.

⁵ Carriers also create AMA records to provide input information for billing their own end users.

1 **Q. HOW ARE THE STANDARDS USED BY THE INDUSTRY?**

2 A. The switch vendors who design and build the end office and tandem switching equipment
3 used by AT&T Missouri and many other carriers refer to Telcordia's requirements to
4 determine the proper standards of how their switching equipment should function.

5
6 **Q. DO THE TELCORDIA STANDARDS REQUIRE CPN TO BE INCLUDED IN**
7 **AMA RECORDINGS FOR WIRELESS-ORIGINATED CALLS?**

8 A. No. Specifically, Telcordia GR-1504 (Generic Requirements for Wireless Service
9 Provider (WSP) Automatic Message Accounting (AMA)) states that in place of CPN for
10 wireless-originated calls, "the Originating Number fields (Tables 13 and 14) in Structure
11 Code 0625 shall contain the per-trunk-group billing number of the WSP."⁶ Therefore,
12 the AMA recording generated by AT&T Missouri's switch populates the billing number
13 of the WSP's trunk group in place of CPN for wireless-originated calls. Mr. Read
14 discusses the billing number of the trunk group in more detail as well as how it is much
15 more useful in billing intercarrier compensation on wireless traffic than CPN.

16
17 **Q. ARE THESE TECHNICAL STANDARDS REFLECTED IN THE EQUIPMENT**
18 **AT&T MISSOURI USES TO PROVIDE SERVICE?**

19 A. Yes. The three Lucent 5ESS™ tandem switches used by AT&T Missouri (and many
20 other carriers), were originally designed in accordance with industry standards to not
21 capture and populate CPN in wireless-originated AMA records. Two of these tandems

⁶ Telcordia GR-1504 (Generic Requirements for Wireless Service Provider (WSP) Automatic Message Accounting (AMA), R3-85, Page 3-22. A copy of this standard is attached to my testimony as Constable-Schedule 2.

1 are located in St. Louis with the third located in Moberly. These three 5ESS™ tandems
2 handle about half of the traffic AT&T Missouri receives from wireless carriers in the
3 state. AT&T Missouri also has six Northern Telecom DMS-100/200™ tandem switches
4 located in Kansas City, Sikeston, Chilicothe, Kirksville, Springfield and St. Joseph that
5 handle the other half of the traffic AT&T Missouri receives from interconnected wireless
6 carriers.⁷ The DMS-100/200™ tandems do contain a software feature that would allow
7 AT&T Missouri to capture CPN in the AMA recordings they make for wireless-
8 originated calls. However, this feature has never been activated or fully tested.
9 Thorough testing would be required to ensure that the feature functions appropriately in
10 capturing the CPN information and does not interfere with other data processing
11 functions or adversely impact other AMA recordings. In addition, as Mr. Read explains,
12 AT&T Missouri does not have processing in place that is capable of creating an EMI
13 Category 11-01-XX billing record that includes CPN on wireless-originated calls even if
14 its switches could capture and generate CPN in the AMA recordings on such calls.

⁷ These figures do not include tandems which only provide a specific purpose such as tandemming 8xx traffic or Operator Services/ Directory Assistance calls.

1 **Q. HAS AT&T MISSOURI IDENTIFIED THE APPROXIMATE COSTS OF**
2 **CAPTURING CPN IN ITS AMA SWITCH RECORDS FOR WIRELESS-**
3 **ORIGINATED TRAFFIC?**

4 A. Yes. As previously mentioned, AT&T Missouri's Lucent tandems do not populate CPN
5 in the AMA switch records for the terminating type 2 wireless calls. As a result, the
6 Lucent 5ESS™ tandems do not have such an ability in place and Lucent would be
7 required to develop this functionality as a new capability in its 5ESS™ switches. If this
8 was an industry practice or requirement, Lucent would have already made this capability
9 available, as it would have been a standard requirement. Instead, Lucent responded that
10 such a function would require new development for which it estimated that the costs
11 could range from \$900K - \$1.3M. A copy of Lucent's feature development estimate is
12 attached to my testimony as Constable-Schedule 3 (HC). This doesn't include the
13 additional costs that AT&T Missouri would incur to load and test the new software
14 package, or the costs AT&T Missouri would incur in its processing systems.

15
16 **Q. DID LUCENT ALSO PROVIDE AN ESTIMATED TIMEFRAME FOR WHEN**
17 **THE CPN CAPABILITY MIGHT BE AVAILABLE?**

18 A. Yes. Lucent estimated the availability to run approximately 6-12 months from a signed
19 agreement. This of course, does not include the time and cost required by AT&T
20 Missouri to load and test the new software packages. It must also be recognized that the
21 costs and availability that I state in my testimony are based on Lucent's September 2005
22 response which was a high-level response only and contained no firm commitments.

1 **V. AT&T MISSOURI DOES NOT “STRIP” OR REMOVE THE CPN FROM**
2 **CALL SIGNALING**

3
4 **Q. ARE THERE OTHER REQUIREMENTS IN THE ENHANCED RECORD**
5 **EXCHANGE RULE THAT PERTAIN TO CPN?**

6 A. Yes. Rules 29.040(1) and (2) require the “originating caller identification” to be
7 delivered with a call.

8
9 **Q. IS THIS REQUIREMENT THE SAME AS A REQUIREMENT TO INCLUDE**
10 **CPN IN A CATEGORY 11-01-XX BILLING RECORD FOR WIRELESS-**
11 **ORIGINATED CALLS?**

12 A. No. The Rule’s requirement is to deliver originating caller identification *with a call*,
13 which AT&T Missouri certainly complies with. AT&T Missouri’s network is configured
14 to pass the CPN it receives from the wireless carrier’s network in the SS7 signaling
15 stream. Thus, AT&T Missouri signals the CPN *in the SS7 call signaling stream*, when
16 AT&T Missouri receives CPN and where it is technically feasible for it to do so (e.g.,
17 where the terminating LEC uses SS7 trunks). However, delivering CPN in the call
18 signaling stream, and including CPN in the EMI records are two completely different
19 functions, which are performed by entirely different telephone company equipment and
20 systems, and are governed by two completely different sets of industry practices.

21 **Q. DOES AT&T MISSOURI MAKE CPN AVAILABLE TO TERMINATING**
22 **CARRIERS?**

1 A. Yes. AT&T Missouri delivers CPN over its SS7 signaling network on nearly all calls
2 that cross its network and terminate to other carriers.⁸ Therefore, if those carriers have a
3 business need to receive CPN and the ability to capture and record CPN in *their* AMA
4 recordings, they could do so.

5
6 **Q. DOES AT&T MISSOURI SUPPORT THE REQUIREMENT IN RULES 29.040(1)**
7 **AND (2) TO DELIVER CPN WITH A CALL?**

8 A. With one minor exception, AT&T Missouri supported Rules 29.040(1) and (2) because
9 industry standards require CPN to be signaled with a call when technically feasible; and
10 signaling CPN enables valuable customer services (like Caller ID) to function and makes
11 CPN available to carriers on the call path that wish to have it. AT&T Missouri follows
12 industry practices, and federal rules in signaling CPN to terminating carriers.⁹

13
14 **Q. WHAT OBJECTION DID AT&T MISSOURI HAVE TO PROPOSED RULES**
15 **29.040(1) AND (2)?**

16 A. These rules requires transit carriers to “deliver originating caller identification” without
17 exception, to downstream carriers. As it stands, such a provision imposes a requirement
18 that is not always technically feasible. A transit carrier cannot deliver such information
19 to downstream carriers if it does not receive the information from the originating carrier
20 (or from the carrier presenting the traffic to it). AT&T Missouri therefore recommended

⁸ AT&T Missouri cannot signal CPN in the relatively rare instances when it does not receive it, nor can AT&T Missouri pass CPN onto terminating carriers who utilize non-SS7 trunks (e.g., Multifrequency or MF trunks.

⁹ Section 64.1600 of the FCC’s rules require the signaling of CPN for certain traffic.

1 a slight modification to add the following clarifying sentence: “It is recognized that
2 transiting carriers can only deliver caller identification to the extent it receives this
3 information with the call.” This suggestion, however, was not adopted.
4

5 **Q. DOES AT&T MISSOURI EXPECT THAT SIGNIFICANT CHANGES IN THE**
6 **INDUSTRY RELATED TO INTERCARRIER COMPENSATION MAY OCCUR**
7 **BETWEEN NOW AND WHEN AT&T MISSOURI COULD FEASIBLY**
8 **POPULATE CPN IN THE WIRELESS AMA RECORDS IF REQUIRED TO DO**
9 **SO?**

10 A. Yes. It is well known in the industry that the FCC is currently examining various broad
11 and potential changes to the existing intercarrier compensation regime (e.g., FCC Docket
12 01-92). It is entirely possible that such reform could include a plan to evolve to a specific
13 compensation rates for certain calls, or conceivably eliminate intercarrier compensation
14 for certain traffic over time. Such changes in the federal rules could render meaningless
15 the time and costs that AT&T Missouri would have to undertake to include CPN in the
16 Category 11 records for wireless originated traffic. Of course, such an action is already
17 meaningless today, as CPN is an unreliable factor in determining the proper rate to bill
18 the wireless service provider as well as in determining which wireless service provider
19 should be billed. Mr. Read further discusses the shortcomings of using CPN in this
20 regard in his testimony.

1 **VI. SUMMARY**

2 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

3 A. Nothing in the Commission's rule 29.040(4) requires tandem carriers to include CPN as
4 part of the Category 11-01-XX record for wireless-originated calls. Imposing a
5 requirement to include CPN in this specific type of billing record would be inconsistent
6 with industry guidelines and costly for AT&T Missouri to implement because of the
7 inherent limitations of the switching equipment AT&T Missouri uses in its network.
8 Imposing such a requirement is also unnecessary because (1) CPN is not a reliable
9 indicator for billing wireless traffic, and (2) AT&T Missouri makes the CPN it receives
10 available for downstream carrier' use on a real-time basis through the signaling AT&T
11 Missouri delivers to them with each call.

12
13 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

14 A. Yes, it does.

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