

Exhibit No.:

Issues:

Witness: John R. Anderson

Sponsoring Party: MCImetro Access  
Transmission Services, LLC,  
Brooks Fiber  
Communications of Missouri, Inc.  
and Intermedia Communications, Inc.

Type of Exhibit: Direct Testimony

Case Nos.: LC-2005-0080

MCImetro Access Transmission Services, LLC  
Brooks Fiber Communications of Missouri, Inc.  
and Intermedia Communications, Inc.

**DIRECT TESTIMONY**

**OF**

**JOHN R. ANDERSON**

**CASE NO. LC-2005-0080**

**JANUARY 7, 2005**

STATE OF Texas )  
 )  
 COUNTY OF Collin ) SS.

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

MCImetro Access Transmission Services, LLC, )  
 Brooks Fiber Communications of Missouri, Inc., ) Case No. LC-2005-0080  
 and Intermedia Communications, Inc., )  
 )  
 Complainants, )  
 )  
 vs. )  
 )  
 CenturyTel of Missouri, Inc., )  
 )  
 Respondent. )

**AFFIDAVIT OF JOHN R. ANDERSON**

COMES NOW John R. Anderson, of lawful age, sound of mind and being first duly sworn, deposes and states:

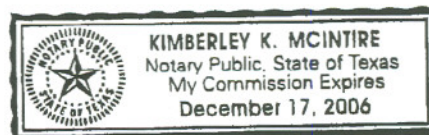
1. My name is John R. Anderson. I am Director of Switch and Dial IP Planning and Implementation for MCI.
2. Attached hereto and made a part hereof for all purposes is my direct testimony in the above-referenced case.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

  
 John R. Anderson

SUBSCRIBED AND SWORN TO before me, a Notary Public, this 5<sup>th</sup> day of January, 2005.

  
 Kimberley K. McIntire  
 Notary Public

My Commission Expires: December 17, 2006



1    **Q.    Please state your name and business address?**

2    A.    My name is John R. Anderson. My business address is 2400 N. Glenville   Richardson, TX  
3           75082.

4    **Q.    By who are you employed and in what capacity?**

5    A.    I am employed by MCI as Director of Switch and Dial Internet Protocol (IP) Planning and  
6           Implementation

7    **Q.    What are your responsibilities?**

8    A.    I am responsible for all network planning and design associated with Local and Long  
9           Distance switched voice service. I am also responsible for network planning and design for  
10          MCI's Internet Dial-Up network. In addition, I have responsibility for the ordering and  
11          provisioning of the circuits to MCI's local switch platforms and the IP Dial-up platform.

12   **Q.    Please describe your employment experience?**

13   A.    I have 25 years experience in telecommunications including management positions over the  
14          following organizations and functions:

- 15           ·        Switch Network Planning, Design and Implementation (Local and Long
- 16                           Distance)
- 17           ·        IP Dial-Up Planning and Design
- 18           ·        Switch Network Routing and Translations
- 19           ·        CCS-7 Network Planning, Design and Implementation

- 1                   ·     X.25 Planning
- 2                   ·     Long Distance Access (Feature Group) Management
- 3                   ·     Central Office Maintenance
- 4                   ·     Central Office Equipment Construction
- 5                   ·     Network Provisioning

6   **Q.     Please state your educational background.**

7   A.     I hold a Bachelors of Business Administration and Computer Science degree from North  
8           Central College, Naperville, IL. I have also completed 80% of a MBA program at University  
9           of Dallas, Dallas, TX

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

11 A.     I describe the use of CenturyTel's COBRA services to provide local dial-up service to ISPs  
12           and the new V.92 network that MCI wants to use instead of those COBRA services.  
13           Attached hereto as Schedule JA-1 are diagrams and explanatory text that compare these two  
14           architectures. I also discuss the negative impacts of CenturyTel's opposition to this change in  
15           architectures.

16 **Q.     What are COBRA Services?**

17 A.     COBRA stands for central office based remote access. It is a Managed Modem service  
18           which, in this instance, an MCI subsidiary purchases from CenturyTel. CenturyTel  
19           provides the Shared Trunk group (PRI) and Modems for dial up Internet. The packet data  
20           stream from the modems is handed off by CenturyTel to MCI via a leased T-1 or DS-3.

1    **Q.     What are T-1s and DS-3s?**

2    **A.     T-1s, or DS1 trunks, are 4-wire digital transmission facilities with a capacity of 1.544**  
3            **mbps, or 24 times the bandwidth of a standard 2-wire analog loop. A DS3 is the**  
4            **equivalent of 28 DS1s.**

5    **Q.     What are PRIs?**

6    **A.     PRIs are Primary Rate Interface trunks. A PRI is an ISDN (Integrated Services Digital**  
7            **Network) equivalent of a T-1 circuit. The PRI provides 23 voice channels plus one out of**  
8            **band signaling channel. In the COBRA scenario, the PRI provides 23 channels between the**  
9            **CenturyTel local switch and the CenturyTel Modem banks in the central office.**

10   **Q.     Is MCI satisfied with continued use of COBRA services for these purposes?**

11   **A.     No.     MCI has built an upgraded IP Dial-Up network with V.92 features that is superior to**  
12            **and eliminates the need for COBRA services. V.92 refers specifically to the enhanced**  
13            **modem technology used in the network. The new V.92 network includes:**

14            ·        Quick Connect - Allows faster modem to modem connection (Hand Shake) to  
15                      MCI's IP network.

16            ·        Modem on Hold - Allows end user to make and receive voice telephone calls  
17                      while maintaining a Dial IP connection. This can alleviate the need for a  
18                      second phone line and prevent missed calls.

19            ·        V.44 - Provides a data compression algorithm which provides faster data  
20                      through put.

21            ·        Enhanced Up Load - Provides a faster up load speed for the end user.

1                   ·       SS7 Management and Functionality / Reporting - Provides additional  
2                               information on the call path for quicker problem diagnosis, troubleshooting,  
3                               and resolution. In addition it provides the ISP with more information on  
4                               network performance.

5   **Q.    Has MCI been able to replace COBRA services with its new V.92 network in**  
6   **CenturyTel service areas in Missouri?**

7   A.    Only on an extremely limited basis. As described by other MCI witnesses in this case, other  
8           than an initial set of orders, CenturyTel has refused to provide interconnection between its  
9           network and MCI's CLEC switches. Hence, except on a limited basis, MCI has not yet been  
10          able to use its V.92 network in CenturyTel service areas.

11 **Q.    What about with other ILECs in Missouri and other states?**

12 A.    We have been able to accomplish the desired change in architectures with other ILECs in  
13          Missouri and other states across the country, although there are some associated billing  
14          disputes in some instances.

15 **Q.    What is the impact of CenturyTel's refusal to provide interconnection?**

16 A.    The results of CenturyTel's refusal to interconnect the networks are:

- 17       1.       ISPs and CenturyTel's end users are denied new V.92 features - The end users in  
18               CenturyTel's service area are not able to utilize these new V.92 features offered by  
19               many ISPs. The end users are forced to use capabilities that provide lower up-load  
20               and down-load speeds. In addition, if end users wish to make or receive phone calls

1 while maintaining an Internet Dial-up connection, they will be forced to purchase a  
2 second phone line.

3 2. MCI is paying excessively high costs for network in CenturyTel's serving area -MCI  
4 is forced to purchase highly expensive COBRA services from CenturyTel. The cost  
5 of CenturyTel's COBRA service is higher than MCI's rates for selling Dial-Up  
6 service to ISPs. MCI is not able to provide profitable service in CenturyTel's service  
7 area. The Internet Dial-Up market is a declining market with a much higher supply  
8 than demand. If MCI is not able to obtain interconnection to CenturyTel's local  
9 switches, MCI will be forced to evaluate whether to continue to provide Internet Dial-  
10 Up in CenturyTel's area. This could result in very limited local Internet Dial-up  
11 availability for the end users in CenturyTel's areas

12 3. Longer circuit outages and troubles - without the features of the V.92 network, MCI  
13 has limited visibility to call path information due to non-SS7 connectivity. This  
14 results in an inability to effectively identify troubles in the network and quickly  
15 resolve them. ISPs and end users are negatively impacted when circuit outages are  
16 not identified or resolved in a reasonable time.

17 **Q. Does this conclude your testimony?**

18 **A. Yes.**