Choctaw/MoKan Exhibit No. 1
Amanda Molina
Direct Testimony
Blocking Requests

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

HALO WIRELESS, INC.,	)	
	)	
Complainant,	)	
	)	
v.	)	**Case No. TC-2012-0331**
	)	
CRAW-KAN TELEPHONE COOPERATIVE, INC., et al.,	)	
	)	
Respondents.	)	

DIRECT TESTIMONY

OF

AMANDA MOLINA

CHOCTAW TELEPHONE COMPANY

And

MOKAN DIAL INC.

Jefferson City, Missouri
June 4, 2012

Almaetal
Choctaw/MoKan
Exhibit No. 1
Date 6-26-12 Reporter PF
File No TC-2012-0331

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v.	)	Case No. TC-2012-0331
	)	
CRAW-KAN TELEPHONE COOPERATIVE, INC., et al.,	)	
	)	
Respondents.	)	

AFFIDAVIT OF AMANDA MOLINA

Amanda Molina, of lawful age, being duly sworn, deposes and states as follows:

1. My name is Amanda Molina. I am employed as Manager of Revenue Requirements with Townes Telecommunications Services Corporation, and am authorized to testify on behalf of Choctaw Telephone Company and MoKan Dial Inc. in this proceeding.

2. Attached hereto and made a part hereof for all purposes is my direct testimony.

3. I hereby 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.

Amanda Molina

Subscribed and sworn to before me this 1 th day of June, 2012.

Notary Public

My Commission expires: August 28, 2015

KIM JACKSON
Commission # EE 088498
Expires August 28, 2015
Bonded Thru Troy Fain Insurance 800-385-7019

Q. Please state your name, business address, and occupation.

A. My name is Amanda Molina and my business address is Townes Telecommunications Services Corporation, 505 Plaza Circle, Suite 200, Orange Park, Florida 32073. I am presently employed as Manager of Revenue Requirements with Townes Telecommunications Services Corporation. Townes Telecommunications Services Corporation is a subsidiary of Townes Telecommunications Company, which owns and operates Choctaw Telephone Company and MoKan Dial Inc.

Q. Please describe your educational and employment background, and current duties.

I completed a Bachelor of Science with dual major Marketing and Business Management and Masters of Business Administration with Accounting minor from University of Phoenix. I have been employed in the telecommunications industry since May 1998, including employment with Northeast Florida Telephone Company from May 1998 through June 2001, and thereafter with Townes Telecommunications to the present. Since 2004 I have been involved in negotiating Reciprocal Compensation Agreements, inter-carrier relations, trending minutes-of-use and revenues, billing disputes, and verification of billed rates as listed in agreements and tariffs. In addition I compile and file responses to data requests and reports with State Public Utilities Commissions and the Federal Communications Commission. My job includes and involves the interpretation and implementation of State and Federal regulatory requirements, the creation and filing of basic local service and intrastate access tariffs, the creation and implementation of training materials to

ensure regulatory compliance, and serving as coordinator with carriers for implementation of local number portability.

Q. What is the purpose of your direct testimony?

A. To provide support for the blocking requests of Choctaw Telephone Company and MoKan Dial Inc., and to provide opposition to Halo Wireless Inc.'s ("Halo") Complaint to stop these blocking requests. The blocking requests made to AT&T, and the notices provided to Halo, are attached hereto as Attachments A, B, C, and D.

Q. Please describe Choctaw and MoKan's business presence in Missouri.

A. Choctaw is an incumbent local exchange company providing local service to approximately 400 customers in the single exchange of Halltown. Halltown is approximately 25 miles southwest of Springfield, Missouri. Choctaw's Halltown exchange subtends AT&T's Springfield LATA tandem for the Springfield LATA 522. Halltown lies within the St. Louis MTA 19.

MoKan is an incumbent local exchange company providing local service to approximately 600 customers in the single Missouri exchange of Freeman. Freeman is located approximately 10 miles west of Harrisonville, Missouri. MoKan's Freeman exchange subtends CenturyLink's Warrensburg access tandem which in turn subtends AT&T Missouri's Kansas City LATA tandem for Kansas City LATA 524. Freeman lies within the Kansas City MTA 34.

Q. What do these blocking requests state as grounds?

A. That Halo has sent landline originated traffic to AT&T destined for termination to Choctaw and MoKan over the LEC-to-LEC network, that Halo has failed to pay bills for traffic that terminated after Halo's bankruptcy filing, that some of the traffic was

interLATA in jurisdiction, that some of the traffic was originated with the use of feature group D protocol trunking arrangements, and that Halo has failed to provide, or has altered, originating caller identification for this traffic.

Q. How do you know that Halo has sent traffic to AT&T destined for Choctaw and MoKan?

A. In the December 2010 to January 2011 carrier access billing period of Choctaw, Halo traffic first began terminating to Choctaw over the LEC-to-LEC network. For MoKan this first began during MoKan's November 2010 billing period. Thereafter AT&T provided Choctaw and MoKan with monthly Halo traffic information to utilize in preparing carrier access bills to Halo. This is the process AT&T and Missouri rural local exchange companies (RLECs) utilize for traffic AT&T receives from CMRS providers that connect with AT&T, and transits to the RLECs. The Halo traffic has continued to terminate monthly since then, and continues to this day.

Q. Did Choctaw or MoKan agree to receive traffic from Halo in this fashion?

A. No. The traffic just started coming without any advance notice.

Q. What did you do?

A. By the time Choctaw and MoKan received the billing information from AT&T we had already been providing terminating services to Halo. We had no knowledge Halo traffic had terminated until we received the billing information. As Halo had not established any arrangements, the only mechanism we had to apply to this traffic was our access tariffs, which were in effect when the Halo traffic terminated. We billed Halo at intrastate terminating traffic rates.

Q. Has Halo made any payment for these bills rendered for traffic terminating after August 8, 2011?

A. No.

Q. Was Halo then the only CMRS provider that was sending traffic to Choctaw and MoKan?

A. No. We were getting traffic over the LEC-to-LEC network via AT&T from more widely known CMRS providers such as AT&T Mobility, Verizon, Sprint, T-Mobile USA, and US Cellular.

Q. Were you getting paid by them?

A. Yes.

Q. Were you billing them terminating intrastate access rates?

A. No, except for terminating inter-MTA wireless traffic, which we billed at interstate or intrastate terminating access rates, we billed them reciprocal compensation rates.

Q. Why is that?

A. After these national CMRS providers obtained interconnection agreements with AT&T, they came to the RLECs and completed the interconnection or traffic termination agreement process. We negotiated agreements, based upon traffic studies and cost information, that specified how much of the traffic transited via AT&T would be reciprocal compensation traffic, how much would be access traffic, how much of the access traffic was intrastate and interstate, the reciprocal compensation rate that would apply to the intraMTA traffic, and other details of our business relationship. These agreements were approved by the Missouri Public Service Commission. Consequently, when AT&T provides us with the billing

information, we know how much access to bill and how much reciprocal compensation to bill. We have been providing termination services, and being paid for those services by these national CMRS providers, for years pursuant to these agreements.

Q. Why didn't it work that way for Halo?

A. Halo claimed that it was a CMRS provider, that the charges in our invoices appeared to relate to the transport and termination of intra-MTA wireless-originated traffic, that we couldn't apply access rates to this traffic, and until we initiated and completed a process for obtaining an interconnection agreement with Halo, Halo had no obligation to pay us anything.

Q. Why didn't you initiate the interconnection agreement negotiation process with Halo?

A. We had no information indicating that Halo was a CMRS provider with a customer base making calls in our service areas. The large volume of Halo traffic we received was not indicative of a start-up CMRS provider. There were industry reports that Halo had no wireless customers of its own, and that it was attempting to characterize landline-originated traffic as wireless-originated traffic in order to avoid paying access charges that are usually higher than reciprocal compensation rates. We decided not to initiate the negotiation process with Halo unless we obtained clear information Halo was sending us its own wireless customers' traffic originated in the same MTA as our customers were located.

Q. Did you later receive clear information to that effect?

A. No. The more we learned the clearer it became that Halo was trying to avoid access charges.

Q. When did you decide to initiate blocking proceedings?

A. In February of 2012.

Q. Why did it take you so long?

A. After other Missouri rural local exchange companies blocked Halo traffic in the spring of 2011, we filed cases with the Missouri Public Service Commission asking for permission to block Halo traffic. Then Halo sued us in multiple federal court proceedings. Then Halo filed for bankruptcy on August 8, 2011. In late October, 2011, the bankruptcy judge ruled that state proceedings could go forward. Then the FCC's November 18, 2011 Connect America Fund Order, which transformed universal service fund and inter-carrier compensation, specifically addressed the Halo traffic situation and ruled that Halo's insertion of a CMRS link in the call path did not convert landline traffic to CMRS traffic. After that decision we requested traffic information from AT&T as to the type and jurisdiction of the Halo traffic. AT&T provided us with summaries of two traffic studies. Then we requested blocking.

Q. What information do you have that Halo has sent traffic to AT&T destined for termination to Choctaw and MoKan?

A. AT&T has sent Choctaw and MoKan Halo terminating traffic information. AT&T's information designated that Halo was responsible to pay for this traffic. AT&T does not provide this information unless it is transiting traffic to Choctaw and MoKan for termination to Choctaw and MoKan customers.

Q. How do you know that this traffic traversed the "LEC-to-LEC" network?

A. The arrangement I described is only utilized where AT&T puts the terminating traffic on the intraLATA toll network, which is also referred to as the LEC-to-LEC Network. For traffic that originates or terminates utilizing an interexchange carrier point of presence, we use a different billing record creation process, and bill the carrier responsible for the trunk delivering the traffic to the terminating access tandem. So the fact that AT&T provided us billing records establishes that the traffic was placed on the LEC-to-LEC network.

Q. What information do you have that any of this traffic was landline originated?

A. We now have three summaries of traffic studies performed by AT&T for Choctaw that show that the following percentages of Halo traffic for the following periods were landline originated:

March 3 to March 12, 2011:	72.1%
November 9 to November 17, 2011:	66.2%
February 26 to March 24, 2012:	77.9%

The three traffic study summaries AT&T provided MoKan show that the following percentages of Halo traffic for the following periods were landline originated:

March 3 to March 12, 2011:	66.7%
November 9 to November 17, 2011:	76.7%
February 26 to March 24, 2012:	78.0%

Copies of these traffic study summaries are attached hereto as Attachments E and F.

Q. How do you know that Halo has failed to pay you for this traffic that terminated after Halo's bankruptcy petition filing?

A. I checked and confirmed that Choctaw and MoKan have sent invoices to Halo's accounts payable department at Halo's address for traffic terminating after August 8, 2011, and that no payments have been received.

Q. How do you know that some of this landline originated traffic was interLATA traffic?

A. The traffic study summary AT&T provided for the February 26 to March 24, 2012 study period shows that 42.1% of the landline originated traffic terminating to Choctaw was interLATA traffic.

The traffic study summary AT&T provided for the February 26 to March 24, 2012 study period shows that 45.6% of the landline originated traffic terminating to MoKan was interLATA traffic.

Q. How do you know that some of this landline originated traffic was originated using feature group D signaling or trunking protocols?

A. InterLATA landline traffic is carried by interexchange carriers (IXCs). IXC traffic is originated using feature group D signaling and trunking protocols.

Q. Does this conclude your direct testimony?

A. Yes.

Choctaw Attachment A

JOHNSON & SPORLEDER, LLP

Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law

February 22, 2012

Via email and certified mail, return receipt requested

Leo Bub
Counsel
AT&T Missouri
One Bell Center, Room 3520
St. Louis, MO 63101

Re: Request for Blocking of Traffic of Halo Wireless Inc. terminating to Choctaw Telephone Company made pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Bub:

This is a traffic blocking request made pursuant to 4 CSR 240-29.130. The terminating carrier making this request is Choctaw Telephone Company (Choctaw). The originating carrier whose traffic Choctaw is requesting AT& T Missouri to block is that of Halo Wireless Inc., OCN 429F (Halo).

Choctaw has invoiced Halo for post-Halo bankruptcy petition traffic termination services. Halo has failed to pay any part of those invoices. Halo has sent landline-originated traffic to Choctaw under the auspices of a CMRS/ILEC interconnection agreement. Halo has placed interLATA traffic on the LEC-to-LEC network for termination to Choctaw. Some of this traffic was originated with the use of feature group D protocol trunking arrangements. Halo has failed to provide, or has altered, originating caller identification information for this traffic. The FCC, at paragraphs 1005 -1006 of its November 18, 2011 Order 11-161specifically analyzed and rejected Halo's contention that it "re-originated" landline toll traffic of its affiliate Transcom and converted it to intraMTA wireless traffic by inserting a wireless connection at its "base stations". Thus FCC stated that such "re-origination of a call over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for purposes of reciprocal compensation and we disagree with Halo's contrary position."

Choctaw requests that AT& T Missouri block Halo traffic from terminating over the LEC-to-LEC network to the following Choctaw exchange:

Exchange	NPA-NXX
Halltown	417-491
	417-749

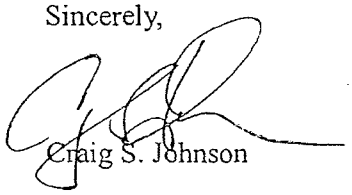
Choctaw Attachment A

304 E. High St., Suite 200 • P.O. Box 1670 • Jefferson City, Missouri 65102
573-659-8734 • 573-761-3587 FAX

Choctaw requests that this traffic be blocked on April 3, 2012, or another date that is mutually agreeable to Choctaw and AT&T Missouri and is within 45 days of this request. 4 CSR 240-29.130(6).

Please let me know if there are any questions or concerns.

Sincerely,



Craig S. Johnson

cc: Russel Wiseman, President
John Van Eschen, Mgr. MoPSC Telecommunications Dept.
William Voight
Debi Nobles

Choctaw Attachment B

JOHNSON & SPORLEDER, LLP

Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law

February 22, 2012

Via email and certified mail, return receipt requested

Russel Wiseman, President
Halo Wireless Inc
2351 West Northwest Highway
Suite 1204
Dallas, TX 75220

Re: Notice of Request for Blocking of Traffic of Halo Wireless Inc. terminating to Choctaw Telephone Company, made pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Wiseman:

Please be notified that Choctaw Telephone Company (Choctaw) has requested that AT&T Missouri block Halo Wireless Traffic terminating to Choctaw pursuant to Missouri Public Service Commission Rule 4 CSR 240-29.130. A copy of that request is attached hereto for your reference.

Pursuant to the Commission Rule, Halo Wireless is notified of the reasons for, date of, and actions it can take to avoid, this traffic blocking.

Reasons for Blocking Request

Choctaw has invoiced Halo for post-Halo bankruptcy petition traffic termination services. Halo has failed to pay any part of those invoices. Halo has sent landline-originated traffic to Choctaw under the auspices of a CMRS/ILEC interconnection agreement. Halo has placed interLATA traffic on the LEC-to-LEC network for termination to Choctaw. Some of this traffic was originated with the use of feature group D protocol trunking arrangements. Halo has failed to provide, or has altered, originating caller identification information on this traffic. The FCC, at paragraphs 1005 -1006 of its November 18, 2011 Order 11-161 specifically analyzed and rejected Halo's contention that it "re-originated" landline toll traffic of its affiliate Transcom and converted it to intraMTA wireless traffic by inserting a wireless connection at its "base stations". Thus FCC stated that such "re-origination of a call over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for purposes of reciprocal compensation and we disagree with Halo's contrary position."

Date Traffic is Requested to be Blocked

April 3, 2012.

Choctaw Attachment B

304 E. High St., Suite 200 • P.O. Box 1670 • Jefferson City, Missouri 65102
573-659-8734 • 573-761-3587 FAX

Actions Halo Wireless Can Take to Prevent Blocking

Pursuant to 4 CSR 240-Chapter 29, Halo Wireless may take any of the following actions to prevent implementation of this blocking request:

a. use alternate means of delivering traffic subject to blocking;

b. file a formal complaint before the Missouri Public Service Commission providing all relevant evidence refuting the stated reasons for blocking;

c. any other means of prevention set forth in 4 CSR 240-Chapter 29.

If Halo chooses any of these alternatives, please notify myself, AT&T Missouri, and John Van Eschen no later than March 12, 2013 to avoid effectuation of traffic blocking.

If any questions or concerns arise regarding this notice, please direct them to me.

Sincerely,

Craig S. Johnson

cc: John Van Eschen, Mgr. MoPSC Telecommunications Dept.
William Voight
Debbie Nobles
Leo Bub

Choctaw Attachment C

DR# 8 - CHOCTAW TELEPHONE CO.				
3/3/11 through 3/12/11				
Terminating State	Traffic Type	Jurisdiction	Terminating Traffic Percent	Landline vs. Wireless Orig%
MO	Wireless Originated	InterMTA	15.4%	27.9%
		IntraMTA	12.4%	
	Landline Originated	Interstate	35.9%	72.1%
		Intrastate	36.3%	
9/11/11 through 9/17/11				
Terminating State	Traffic Type	Jurisdiction	Terminating Traffic Percent	Landline vs. Wireless Orig%
MO	Wireless Originated	InterMTA	30.7%	33.8%
		IntraMTA	3.1%	
	Landline Originated	Interstate	30.5%	66.2%

Choctaw Attachment C-1

Case No. TC-2012-0331
Alma, Choctaw, MoKan Dial
Data Requests

Choctaw Telephone Company

2. Did AT&T perform any study of traffic delivered by Halo Wireless Inc. to AT&T and transited to Choctaw Telephone Company after August 8, 2011 that includes the state of origin of the calls included in such study? If so please identify the personnel responsible for performing each such study, and please provide a copy of the results of such study.

Response: Yes, AT&T performed a 2/26/2012 through 3/24/2012 (DMS Switch) and a 11/9/2011 through 11/17/2011 (DMS Switch) traffic study. Please see as follows:

CHOCTAW TELEPHONE CO.							
State	LERG Traffic Type	Jurisdiction	Jurisdiction Percent	Landline vs. Wireless Orig %	InterLATA	IntraLATA	Traffic Study Date
MO	Wireless Originated	InterLATA InterMTA Interstate	15.1%	22.1%	57.8%	42.2%	2/26/2012 through 3/24/2012
		InterLATA InterMTA Intrastate	0.3%				
		InterLATA IntraMTA	0.3%				
		IntraLATA InterMTA Intrastate	4.5%				
		IntraLATA IntraMTA	1.9%				
	Landline Originated	InterLATA Interstate	30.2%	77.9%			
		InterLATA Intrastate	11.9%				
		IntraLATA Interstate	0.0%				
		IntraLATA Intrastate	35.8%				
Total			100.0%	100.0%	100.0%		

Responsible Persons: Stan Mensinger
Mark Neinast

Choctaw Attachment C-2

MoKan Attachment A

JOHNSON & SPORLEDER, LLP

Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law

February 22, 2012

Via email and certified mail, return receipt requested

Leo Bub
Counsel
AT&T Missouri
One Bell Center, Room 3520
St. Louis, MO 63101

Re: Request for Blocking of Traffic of Halo Wireless Inc. terminating to MoKan Dial Inc. pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Bub:

This is a traffic blocking request made pursuant to 4 CSR 240-29.130. The terminating carrier making this request is MoKan Dial Inc. (MoKan). The originating carrier whose traffic MoKan is requesting AT& T Missouri to block is that of Halo Wireless Inc., OCN 429F (Halo).

MoKan has invoiced Halo for post-Halo bankruptcy petition traffic termination services. Halo has failed to pay any part of those invoices. Halo has sent landline-originated traffic to MoKan under the auspices of a CMRS/ILEC interconnection agreement. Halo has placed interLATA traffic on the LEC-to-LEC network for termination to MoKan. Some of this traffic was originated with the use of feature group D protocol trunking arrangements. Halo has failed to provide, or has altered, originating caller identification information for this traffic to MoKan. The FCC, at paragraphs 1005 -1006 of its November 18, 2011 Order 11-161specifically analyzed and rejected Halo's contention that it "re-originated" landline toll traffic of its affiliate Transcom and converted it to intraMTA wireless traffic by inserting a wireless connection at its "base stations". Thus FCC stated that such "re-origination of a call over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for purposes of reciprocal compensation and we disagree with Halo's contrary position."

MoKan requests that AT& T Missouri block Halo traffic from terminating over the LEC-to-LEC network to the following MoKan exchange:

Exchange	NPA-NXX
Freeman	816-250
	816-899

MoKan Attachment A

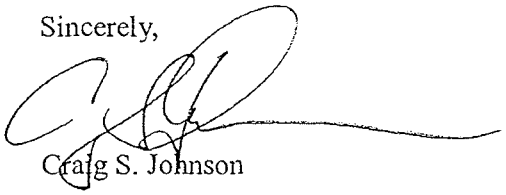
MoKan requests that this traffic be blocked on April 3, 2012, or another date that is mutually

304 E. High St., Suite 200 • P.O. Box 1670 • Jefferson City, Missouri 65102
573-659-8734 • 573-761-3587 FAX

agreeable to MoKan and AT&T Missouri and is within 45 days of this request. 4 CSR 240-29.130(6).

Please let me know if there are any questions or concerns.

Sincerely,



Craig S. Johnson

cc: Russel Wiseman, President
John Van Eschen, Mgr. MoPSC Telecommunications Dept.
William Voight
Debi Nobles

MoKan Attachment B

JOHNSON & SPORLEDER, LLP

Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law

February 22, 2012

Via email and certified mail, return receipt requested

Russel Wiseman, President
Halo Wireless Inc
2351 West Northwest Highway
Suite 1204
Dallas, TX 75220

Re: Notice of Request for Blocking of Traffic of Halo Wireless Inc. terminating to MoKan Dial Inc., made pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Wiseman:

Please be notified that MoKan Dial Inc. (MoKan) has requested that AT&T Missouri block Halo Wireless Traffic terminating to MoKan pursuant to Missouri Public Service Commission Rule 4 CSR 240-29.130. A copy of that request is attached hereto for your reference.

Pursuant to the Commission Rule, Halo Wireless is notified of the reasons for, date of, and actions it can take to avoid, this traffic blocking.

Reasons for Blocking Request

MoKan has invoiced Halo for post-Halo bankruptcy petition traffic termination services. Halo has failed to pay any part of those invoices. Halo has sent landline-originated traffic to MoKan under the auspices of a CMRS/ILEC interconnection agreement. Halo has placed interLATA traffic on the LEC-to-LEC network for termination to MoKan. Some of this traffic was originated with the use of feature group D protocol trunking arrangements. Halo has failed to provide, or has altered, originating caller identification information on this traffic to MoKan. The FCC, at paragraphs 1005 -1006 of its November 18, 2011 Order 11-161 specifically analyzed and rejected Halo's contention that it "re-originated" landline toll traffic of its affiliate Transcom and converted it to intraMTA wireless traffic by inserting a wireless connection at its "base stations". Thus FCC stated that such "re-origination of a call over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for purposes of reciprocal compensation and we disagree with Halo's contrary position."

Date Traffic is Requested to be Blocked

April 3, 2012.

304 E. High St., Suite 200 • P.O. Box 1670 • Jefferson City, Missouri 65102
573-659-8734 • 573-761-3587 FAX

Actions Halo Wireless Can Take to Prevent Blocking

Pursuant to 4 CSR 240-Chapter 29, Halo Wireless may take any of the following actions to prevent implementation of this blocking request:

a. use alternate means of delivering traffic subject to blocking;

b. file a formal complaint before the Missouri Public Service Commission providing all relevant evidence refuting the stated reasons for blocking;

c. any other means of prevention set forth in 4 CSR 240-Chapter 29.

If Halo chooses any of these alternatives, please notify myself, AT&T Missouri, and John Van Eschen no later than March 12, 2013 to avoid effectuation of traffic blocking.

If any questions or concerns arise regarding this notice, please direct them to me.

Sincerely,

Craig S. Johnson

cc: John Van Eschen, Mgr. MoPSC Telecommunications Dept.
William Voight
Debbie Nobles
Leo Bub

MoKan Attachment C

DR# 10 - MO - KAN DIAL, INC.				
3/3/11 through 3/12/11				
Terminating State	Traffic Type	Jurisdiction	Terminating Traffic Percent	Landline vs. Wireless Orig%
MO	Wireless Originated	InterMTA	25.3%	33.3%
		IntraMTA	7.9%	
	Landline Originated	Interstate	36.4%	66.7%
		Intrastate	30.3%	
9/11/11 through 9/17/11				
Terminating State	Traffic Type	Jurisdiction	Terminating Traffic Percent	Landline vs. Wireless Orig%
MO	Wireless Originated	InterMTA	14.3%	23.3%
		IntraMTA	9.0%	
	Landline Originated	Interstate	17.9%	76.7%
		Intrastate	58.8%	

McClain Attachment C-1

MoKan Dial Inc. (Missouri traffic only)

1. Did AT&T perform any study of traffic delivered by Halo Wireless Inc. to AT&T and transited to MoKan Dial Inc.'s Freeman, Missouri exchange after August 8, 2011 that includes the state of origin of the calls included in such study? If so please identify the personnel responsible for performing each such study, and please provide a copy of the results of such study.

Response: Yes, AT&T performed a 2/26/2012 through 3/24/2012 (DMS Switch) and a 11/9/2011 through 11/17/2011 (DMS Switch) traffic study. Please see as follows:

MOKAN DIAL, INC.							
State	LERG Traffic Type	Jurisdiction	Jurisdiction Percent	Landline vs. Wireless Orig %	InterLATA	IntraLATA	Traffic Study Date
MO	Wireless Originated	InterLATA InterMTA Interstate	8.8%	22.0%	61.5%	38.5%	2/26/2012 through 3/24/2012
		InterLATA InterMTA Intrastate	5.5%				
		InterLATA IntraMTA	1.6%				
		IntraLATA InterMTA Intrastate	0.0%				
		IntraLATA IntraMTA	6.1%				
	Landline Originated	InterLATA Interstate	37.0%	78.0%			
		InterLATA Intrastate	8.6%				
		IntraLATA Interstate	9.1%				
		IntraLATA Intrastate	23.3%				
Total			100.0%	100.0%	100.0%		

Responsible Persons: Stan Mensinger
Mark Neinast

MoKan Attachment C-2