

COMPLAINT OF LEVEL 3
COMMUNICATIONS, LLC,
AGAINST CENTURYTEL OF LAKE
DALLAS, INC. AND CENTURYTEL
OF SAN MARCOS, INC.

DOCKET NO. 26431

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PUBLIC UTILITY COMMISSION

OF TEXAS

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BEFORE THE PUBLIC UTILITY COMMISSION
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DIRECT TESTIMONY OF SUSAN W. SMITH

ON BEHALF OF
CENTURYTEL

FILED³

DEC 14 2004

Missouri Public
Service Commission

OCTOBER 10, 2002

Exhibit No. 22
Case No(s). CO-2005-0066
Date 11-12-04 Rptr PI

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PREFILED TESTIMONY OF SUSAN SMITH

1 I. INTRODUCTION

2 Q. Please state your name and business address.

3 A. My name is Susan W. Smith. My business address is 911 North Bishop Rd.,
4 C207, Texarkana, TX 75503.

5 Q. By whom are you employed?

6 A. I am employed by CenturyTel Service Group, L.L.C., a subsidiary of CenturyTel,
7 Inc. CenturyTel Service Group, LLC. provides many management and
8 accounting functions for subsidiaries of CenturyTel, Inc., including CenturyTel of
9 San Marcos, Inc.

10 Q. What are your responsibilities at CenturyTel Service Group?

11 A. As Director of External Affairs, I am responsible for regulatory and legislative
12 affairs for CenturyTel's operations in Texas, Arkansas, Mississippi, and
13 Tennessee. My responsibilities include but are not limited to interconnection
14 matters as well as other regulatory and legislative matters that would effect
15 CenturyTel subsidiaries in each of these states.

16 Q. Have you ever testified before any regulatory agency?

17 A. Yes. I have testified on various issues concerning wireless and land line
18 telecommunications service, such as wireless and landline interconnection,
19 reverse billing, number portability, general licensing matters, including
20 certificates of public convenience and necessity, competitive issues and universal
21 service. I have testified before the state regulatory commissions of Arkansas,
22 Michigan, Mississippi, Indiana, Louisiana, New Mexico, Arizona and Wisconsin.

1 Q. Please describe your educational background and work-related training.

2 A. I have a Bachelor of Administration Degree in Management and Bachelor of
3 Administration Degree in Marketing with a minor in Accounting from Texas
4 A&M University. I have been employed by CenturyTel since February, 1983
5 where I have held various positions, including Assistant Director of Marketing,
6 Assistant to the Sr. Vice President of Revenues and External Affairs, Director of
7 Industry Relations and Director of External Affairs. I have been involved in
8 interconnection issues for CenturyTel's wireless, wireline and CLEC operations
9 since 1990. I have participated in arbitration proceedings regarding
10 interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.

11 Q. Will another witness testifying on behalf of CenturyTel?

12 A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony
13 on behalf of CenturyTel.

14 *II. SUMMARY OF TESTIMONY*

15 Q. What is the purpose of your testimony?

16 A. My testimony provides history of the traffic dispute between CenturyTel and Level
17 3. My testimony will show that Level 3's proposal does not involve the exchange
18 of local traffic with CenturyTel. I will explain that what Level 3 proposes is to
19 provide interexchange inward calling service to Level 3's Internet Service
20 Provider (ISP) customers not located within CenturyTel's local calling area under
21 the guise of local calling via the use of "Virtual NXX" numbers. To the extent that
22 Level 3 seeks an interconnection agreement with CenturyTel for the transport and
23 termination of ISP-bound traffic outside CenturyTel's local calling area, such an