#### DOCKET NO. 26431 §

§

§

§

\$ \$ \$ \$

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

# 26431 BEFORE THEUTICITY COMMISSION

RECEIVED 02 OCT 10 PM 2: 17

OF TEXAS

#### DIRECT TESTIMONY OF SUSAN W. SMITH

ON BEHALF OF CENTURYTEL FILED<sup>3</sup>

DEC 1 4 2004

Missouri Public Service Commission

**OCTOBER 10, 2002** 

t

Exhib Case No(s).	it No. 22
Case No(s). (0	2005-0066
Date 11-12-04	

## TABLE OF CONTENTS (filename: SSDIR1.doc)

I.	INTRODUCTION	. 3
II.	SUMMARY OF TESTIMONY	.4
III.	NEGOTIATIONS BETWEEN CENTURYTEL AND LEVEL 3	. 5
IV.	LEVEL 3 NETWORK AND SERVICE DESCRIPTION	. 8
V.	CENTURYTEL'S PROPOSED ALTERNATIVE AGREEMENT	17
VI.	OTHER OPEN ISSUES	18
VII.	CONCLUSION	18
VIII.	CENTURYTEL'S PROPOSED OUTCOME.	22

EXHIBIT SS-1	LEVEL 3 NETWORK AND SERVICE	EXAMPLE 2	23
EXHIBIT SS-2	FX SERVICE	2	24
EXHIBIT SS-3	800 SERVICE	. 2	25

### PREFILED TESTIMONY OF SUSAN SMITH

-

1	<i>I</i> .	INTR	ODUCTION
2		Q.	Please state your name and business address.
3		Α.	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?
б		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		А.	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.

3

O.         Please describe your educational background and work-related training.           1         A         I have a Bachelor of Administration Degree in Management and Bachelor of Administration Degree in Marketing with a minor in Accounting from Texas A&M University. I have been in employed by CenturyTel since February, 1983 where I have held various positions, including Assistant Director of Marketing, Assistant to the Sr. Vice President of Revenues and External Affairs, Director of Industry Relations and Director of External Affairs. I have been involved in interconnection issues for CenturyTel's wireless, wireline and CLEC operations since 1990. I have participated in arbitration proceedings regarding interconnection matters in Louisiana, Michigan, Wisconsin and Indian.           0         Will another witness testifying on behalf of CenturyTel?           1         A yes Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony orbital of CenturyTel.           1         O. What is the purpose of your testimony?           1         A ty testimony provides history of the traffic dispute between CenturyTel and Level 1. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange invard calling service to Level 3's Internet Service Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an envination of ISP-bound traffic outside CenturyTel's local calling area, such an			-	······································	
<ul> <li>A. I have a Bachelor of Administration Degree in Management and Bachelor of Administration Degree in Marketing with a minor in Accounting from Texas A&amp;M University. I have been in employed by CenturyTel since February, 1983 where I have held various positions, including Assistant Director of Marketing, Assistant to the Sr. Vice President of Revenues and External Affairs, Director of Industry Relations and Director of External Affairs. I have been involved in interconnection issues for CenturyTel's wireless, wireline and CLEC operations since 1990. I have participated in arbitration proceedings regarding interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony on behalf of CenturyTel.</li> <li>J. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level 3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>					
<ul> <li>A. I have a Bachelor of Administration Degree in Management and Bachelor of Administration Degree in Marketing with a minor in Accounting from Texas A&amp;M University. I have been in employed by CenturyTel since February, 1983 where I have held various positions, including Assistant Director of Marketing, Assistant to the Sr. Vice President of Revenues and External Affairs, Director of Industry Relations and Director of External Affairs. I have been involved in interconnection issues for CenturyTel's wireless, wireline and CLEC operations since 1990. I have participated in arbitration proceedings regarding interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony on behalf of CenturyTel.</li> <li>J. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level 3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an</li> </ul>				·	
<ul> <li>A. I have a Bachelor of Administration Degree in Management and Bachelor of Administration Degree in Marketing with a minor in Accounting from Texas A&amp;M University. I have been in employed by CenturyTel since February, 1983 where I have held various positions, including Assistant Director of Marketing, Assistant to the Sr. Vice President of Revenues and External Affairs, Director of Industry Relations and Director of External Affairs. I have been involved in interconnection issues for CenturyTel's wireless, wireline and CLEC operations since 1990. I have participated in arbitration proceedings regarding interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony on behalf of CenturyTel.</li> <li>J. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level 3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an</li> </ul>					
3       Administration Degree in Marketing with a minor in Accounting from Texas         4       A&M University. I have been in 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	1		Q.	Please describe your educational background and work-related training.	
<ul> <li>A&amp;M University. I have been in employed by CenturyTel since February, 1983</li> <li>where I have held various positions, including Assistant Director of Marketing,</li> <li>Assistant to the Sr. Vice President of Revenues and External Affairs, Director of</li> <li>Industry Relations and Director of External Affairs. I have been involved in</li> <li>interconnection issues for CenturyTel's wireless, wireline and CLEC operations</li> <li>since 1990. I have participated in arbitration proceedings regarding</li> <li>interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on hehalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony</li> <li>on behalf of CenturyTel.</li> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange</li> <li>of local traffic with CenturyTel. I will explain that what Level 3 proposes is to</li> <li>provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under</li> <li>the guise of local calling via the use of "Virtual NXX" numbers. To the extent that</li> <li>Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an</li> </ul>	2		А.	I have a Bachelor of Administration Degree in Management and Bachelor of	
<ul> <li>where I have held various positions, including Assistant Director of Marketing,</li> <li>Assistant to the Sr. Vice President of Revenues and External Affairs, Director of</li> <li>Industry Relations and Director of External Affairs. I have been involved in</li> <li>interconnection issues for CenturyTel's wireless, wireline and CLEC operations</li> <li>since 1990. I have participated in arbitration proceedings regarding</li> <li>interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony</li> <li>on behalf of CenturyTel.</li> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange</li> <li>of local traffic with CenturyTel. I will explain that what Level 3 proposes is to</li> <li>provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under</li> <li>the guise of local calling via the use of "Virtual NXX" numbers. To the extent that</li> <li>Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an</li> </ul>	3			Administration Degree in Marketing with a minor in Accounting from Texas	
<ul> <li>Assistant to the Sr. Vice President of Revenues and External Affairs, Director of</li> <li>Industry Relations and Director of External Affairs. I have been involved in</li> <li>interconnection issues for CenturyTel's wireless, wireline and CLEC operations</li> <li>since 1990. I have participated in arbitration proceedings regarding</li> <li>interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony</li> <li>on behalf of CenturyTel.</li> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange</li> <li>of local traffic with CenturyTel. I will explain that what Level 3 proposes is to</li> <li>provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under</li> <li>the guise of local calling via the use of "Virtual NXX" numbers. To the extent that</li> <li>Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an</li> </ul>	4			A&M University. I have been in employed by CenturyTel since February, 1983	
<ul> <li>Industry Relations and Director of External Affairs. I have been involved in interconnection issues for CenturyTel's wireless, wireline and CLEC operations since 1990. I have participated in arbitration proceedings regarding interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony on behalf of CenturyTel.</li> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level 3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel for the transport and termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>	5			where I have held various positions, including Assistant Director of Marketing,	
<ul> <li>interconnection issues for CenturyTel's wireless, wireline and CLEC operations</li> <li>since 1990. I have participated in arbitration proceedings regarding</li> <li>interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony</li> <li>on behalf of CenturyTel.</li> <li><i>II. SUMMARY OF TESTIMONY</i></li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange</li> <li>of local traffic with CenturyTel. I will explain that what Level 3 proposes is to</li> <li>provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under</li> <li>the guise of local calling via the use of "Virtual NXX" numbers. To the extent that</li> <li>Level 3 seeks an interconnection agreement with CenturyTel for the transport and</li> <li>termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>	6			Assistant to the Sr. Vice President of Revenues and External Affairs, Director of	
<ul> <li>since 1990. 1 have participated in arbitration proceedings regarding</li> <li>interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony</li> <li>on behalf of CenturyTel.</li> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange</li> <li>of local traffic with CenturyTel. I will explain that what Level 3 proposes is to</li> <li>provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under</li> <li>the guise of local calling via the use of "Virtual NXX" numbers. To the extent that</li> <li>Level 3 seeks an interconnection agreement with CenturyTel for the transport and</li> <li>termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>	7			Industry Relations and Director of External Affairs. I have been involved in	·
<ul> <li>interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.</li> <li>Q. Will another witness testifying on behalf of CenturyTel?</li> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony on behalf of CenturyTel.</li> <li><i>II. SUMMARY OF TESTIMONY</i></li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel for the transport and termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>	8			interconnection issues for CenturyTel's wireless, wireline and CLEC operations	;
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	9			since 1990. I have participated in arbitration proceedings regarding	
<ul> <li>A. Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony on behalf of CenturyTel.</li> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel for the transport and termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>	10			interconnection matters in Louisiana, Michigan, Wisconsin and Indiana.	
13on behalf of CenturyTel.14II.14II.15Q.16A.173.18of local traffic with CenturyTel. I will explain that what Level 3 proposes is to19provide interexchange inward calling service to Level 3's Internet Service20Provider (ISP) customers not located within CenturyTel's local calling area under21the guise of local calling via the use of "Virtual NXX" numbers. To the extent that22Level 3 seeks an interconnection agreement with CenturyTel's local calling area, such an	11		Q.	Will another witness testifying on behalf of CenturyTel?	i
<ul> <li>II. SUMMARY OF TESTIMONY</li> <li>Q. What is the purpose of your testimony?</li> <li>A. My testimony provides history of the traffic dispute between CenturyTel and Level</li> <li>3. My testimony will show that Level 3's proposal does not involve the exchange</li> <li>of local traffic with CenturyTel. I will explain that what Level 3 proposes is to</li> <li>provide interexchange inward calling service to Level 3's Internet Service</li> <li>Provider (ISP) customers not located within CenturyTel's local calling area under</li> <li>the guise of local calling via the use of "Virtual NXX" numbers. To the extent that</li> <li>Level 3 seeks an interconnection agreement with CenturyTel for the transport and</li> <li>termination of ISP-bound traffic outside CenturyTel's local calling area, such an</li> </ul>	12		A.	Yes. Mr. Wesley Robinson of John Staurulakis, Inc. is also presenting testimony	
15Q.What is the purpose of your testimony?16A.My testimony provides history of the traffic dispute between CenturyTel and Level173. My testimony will show that Level 3's proposal does not involve the exchange18of local traffic with CenturyTel. I will explain that what Level 3 proposes is to19provide interexchange inward calling service to Level 3's Internet Service20Provider (ISP) customers not located within CenturyTel's local calling area under21the guise of local calling via the use of "Virtual NXX" numbers. To the extent that22Level 3 seeks an interconnection agreement with CenturyTel for the transport and23termination of ISP-bound traffic outside CenturyTel's local calling area, such an	13			on behalf of CenturyTel.	
A. My testimony provides history of the traffic dispute between CenturyTel and Level 3. My testimony will show that Level 3's proposal does not involve the exchange of local traffic with CenturyTel. I will explain that what Level 3 proposes is to provide interexchange inward calling service to Level 3's Internet Service Provider (ISP) customers not located within CenturyTel's local calling area under the guise of local calling via the use of "Virtual NXX" numbers. To the extent that Level 3 seeks an interconnection agreement with CenturyTel for the transport and termination of ISP-bound traffic outside CenturyTel's local calling area, such an	14	II.	SUM	IMARY OF TESTIMONY	
173. My testimony will show that Level 3's proposal does not involve the exchange18of local traffic with CenturyTel. I will explain that what Level 3 proposes is to19provide interexchange inward calling service to Level 3's Internet Service20Provider (ISP) customers not located within CenturyTel's local calling area under21the guise of local calling via the use of "Virtual NXX" numbers. To the extent that22Level 3 seeks an interconnection agreement with CenturyTel for the transport and23termination of ISP-bound traffic outside CenturyTel's local calling area, such an	15		Q.	What is the purpose of your testimony?	:
18of local traffic with CenturyTel. I will explain that what Level 3 proposes is to19provide interexchange inward calling service to Level 3's Internet Service20Provider (ISP) customers not located within CenturyTel's local calling area under21the guise of local calling via the use of "Virtual NXX" numbers. To the extent that22Level 3 seeks an interconnection agreement with CenturyTel for the transport and23termination of ISP-bound traffic outside CenturyTel's local calling area, such an	16	•	Α.	My testimony provides history of the traffic dispute between CenturyTel and Level	
19provide interexchange inward calling service to Level 3's Internet Service20Provider (ISP) customers not located within CenturyTel's local calling area under21the guise of local calling via the use of "Virtual NXX" numbers. To the extent that22Level 3 seeks an interconnection agreement with CenturyTel for the transport and23termination of ISP-bound traffic outside CenturyTel's local calling area, such an	17			3. My testimony will show that Level 3's proposal does not involve the exchange	
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	18			of local traffic with CenturyTel. I will explain that what Level 3 proposes is to	i
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	19			provide interexchange inward calling service to Level 3's Internet Service	
Level 3 seeks an interconnection agreement with CenturyTel for the transport and termination of ISP-bound traffic outside CenturyTel's local calling area, such an	20			Provider (ISP) customers not located within CenturyTel's local calling area under	-
23 termination of ISP-bound traffic outside CenturyTel's local calling area, such an	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	
4	23			termination of ISP-bound traffic outside CenturyTel's local calling area, such an	
4		•			
			·	4	