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January 11, 2001

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102

**FILED<sup>2</sup>**  
JAN 11 2001  
Missouri Public  
Service Commission

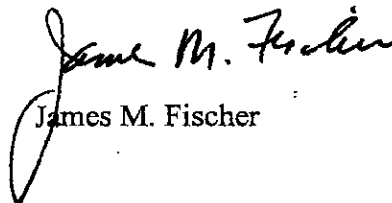
RE: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of Surrebuttal Testimony of Kathryn Allison, Product Manager Network Services Group, on behalf of GTE Midwest Incorporated d/b/a Verizon Midwest. A copy of the foregoing Surrebuttal Testimony has been hand-delivered or mailed, this date, to each party of record.

Thank you for your attention to this matter.

Sincerely,

  
James M. Fischer

/jr  
Enclosures

cc: Service List

Exhibit No. 21  
Date 1-24-01 Case No. TO-99-593  
Reporter TUC

## SERVICE LIST

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class mail, postage prepaid, this 11<sup>th</sup> day of January 2001, to:

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City MO 65102

Dana K. Joyce  
General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City MO 65102

David W. Evans  
GTE Midwest Incorporated  
601 Monroe, Suite 304  
Jefferson City MO 65101

W.R. England III  
Brydon Swearengen & England  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City MO 65102-0456

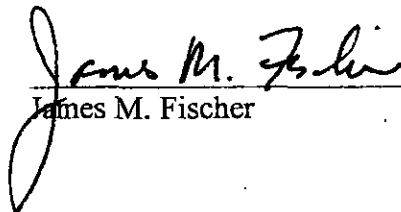
Peter Mirakian III  
1000 Walnut Street  
Suite 1400  
Kansas City MO 64106

Steve Minnis  
Sprint Missouri Inc.  
5454 West 110<sup>th</sup> Street  
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St. Louis MO 63101

Paul S. DeFord  
Lathrop & Gage LC  
2345 Grand Ave Suite 2500  
Kansas City MO 64108



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James M. Fischer

Exhibit No.: \_\_\_\_\_  
Issue: Records  
and Related Issues  
Witness: Kathryn Allison  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Verizon Midwest  
Case No.: TO-99-593  
Date Testimony Prepared: January 11, 2001

**FILED**<sup>2</sup>

JAN 11 2001

Missouri Public  
Service Commission

**SURREBUTTAL TESTIMONY**

**OF**

**KATHRYN ALLISON  
PRODUCT MANAGER  
NETWORK SERVICES GROUP-INTERCONNECTION**

**ON BEHALF OF**

**GTE MIDWEST INCORPORATED D/B/A VERIZON MIDWEST**

**JANUARY 11, 2001**

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

In the Matter of the Investigation )  
Into Signaling Protocols, Call )  
Records, Trunking Arrangements, ) Case No. TO-99-593  
And Traffic Measurement )

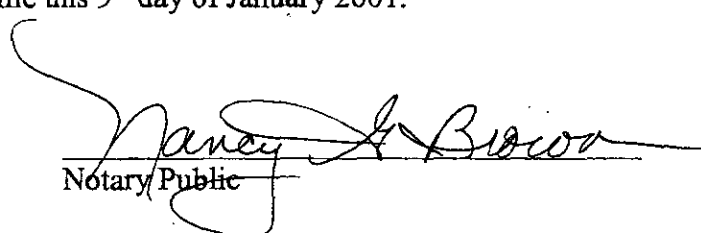
AFFIDAVIT OF KATHRYN ALLISON

STATE OF TEXAS )  
 ) SS  
COUNTY OF DALLAS )

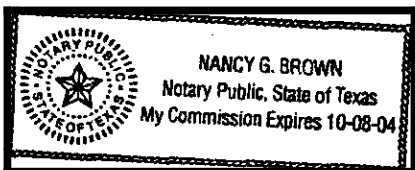
I, Kathryn Allison, of lawful age, on my oath state: I have participated in the preparation of the attached testimony; the answers in the testimony were given by me; I have knowledge of the matters set forth in the answers; and the answers are true and correct to the best of my knowledge and belief.

  
Kathryn Allison

Subscribed and sworn to before me this 9<sup>th</sup> day of January 2001.

  
Notary Public

My Commission Expires:



1                    **SURREBUTTAL TESTIMONY OF KATHRYN ALLISON**  
2  
3

4    **Q.     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

5    A.     My name is Kathryn Allison. My business address is 600 Hidden Ridge, Irving,  
6           Texas.

7  
8    **Q.     MR. SCHOONMAKER USES THE EXAMPLE OF ACCESS BILLING**  
9           **FOR IXCS TO SUGGEST THAT TANDEM CARRIERS SHOULD BE**  
10          **RESPONSIBLE FOR PAYING FOR THE TERMINATION OF TRAFFIC**  
11          **TO THE SMALL LECS. DO YOU AGREE WITH MR. SCHOONMAKER**  
12          **THAT THE IXC ACCESS EXAMPLE SHOULD APPLY TO THE**  
13          **TERMINATION OF INTRALATA TRAFFIC AT ISSUE IN THIS CASE?**

14  
15   A.     No, I do not agree. The IXC access billing environment and the LEC-to-LEC  
16           billing environment are different in one crucial respect. Unlike the LEC-to-LEC  
17           environment, IXCs have compensation arrangements with other carriers that  
18           transport IXCs' access traffic. An IXC also has the ability to bill the originating  
19           end user. This arrangement makes the IXC whole for the network functionality it  
20           performs. In contrast, the LEC that performs transiting of intraLATA traffic to a  
21           terminating LEC does not have the ability to bill the originating carrier. Further,  
22           the transiting LEC cannot bill the originating end user of another LEC for  
23           intraLATA toll.

1   **Q.   MR. SCHOONMAKER STATES THAT UNDER THE SMALL**  
2       **COMPANIES' PROPOSAL, THE TERMINATING LEC WOULD BE**  
3       **ABLE TO IDENTIFY TRAFFIC BY THE TRUNK GROUP OVER**  
4       **WHICH THE TERMINATING TRAFFIC IS DELIVERED. DO YOU**  
5       **AGREE? [p. 3, lines 17-18]**

6   **A.**   No, I do not agree. Verizon Midwest would not be able to identify all traffic that  
7       transits its tandems. For example, Verizon Midwest cannot identify the true  
8       originating trunk for traffic that is inter-tandem switched from other LEC  
9       tandems. The trunk between LEC tandems is a common trunk and the identity of  
10      the originating trunk group is lost when the call is inter-tandem switched.

11  
12      The only way for Verizon Midwest to identify traffic by the trunk group over  
13      which the traffic is terminated is to have direct connections with every LEC in the  
14      LATA, as it does for CLEC and wireless providers. Although direct connections  
15      would enable Verizon Midwest to identify the point of interconnection or trunk  
16      group and to exchange records with the terminating company, such a network  
17      configuration would be very costly, cause premature exhaustion of tandem  
18      switches and would be an inefficient network arrangement. For these reasons,  
19      Verizon Midwest believes OBF Issue 2056 is the best solution.

20  
21   **Q.   DO YOU AGREE WITH MR. SCHOONMAKER THAT THE NETWORK**  
22       **TEST DEMONSTRATED THAT TERMINATING RECORDINGS ARE**  
23       **ACCURATE AND RELIABLE? [p. 14]**

1

2 A. No, I do not agree. In fact, Verizon Midwest submitted data requests for  
3 information on the type of terminating recordings used for the test. To date, the  
4 data requests have not been answered.

5

6 Q. MR. LARSEN STATES THAT THE SMALL COMPANIES' PROPOSAL  
7 WOULD REQUIRE THAT SWBT PREPARE ACCESS USAGE  
8 RECORDS (AURS) TO RECORD THE TRAFFIC OF OTHER FORMER  
9 PTCs AND IXCS. DO YOU ADVOCATE THAT THIS TYPE OF  
10 RECORD BE USED FOR TRAFFIC BETWEEN FORMER PTCs?

11

12 A. No, I do not. There is a fundamental difference between an IXC and the former  
13 Primary Toll Carriers (PTC's) insofar as traffic from a CLEC is concerned. If a  
14 CLEC "pops" out the traffic, the IXC receives the toll revenue from the end user  
15 and then is responsible for the access charges for that traffic, thus the use of an  
16 AUR is appropriate. In the case of the former PTC handling the traffic of a CLEC,  
17 the former PTC garners no toll revenue from the end user for the transited traffic.  
18 Thus the former PTC is not in the equivalent position as the IXC.

19

20 In addition, the small companies are currently receiving CAT 11 records from the  
21 former PTCs, as ordered by the Commission in TO-99-254. The small companies  
22 and/or their billing vendors have already modified their billing systems to accept  
23 these records and have been billing the appropriate originating carrier since the

1 PTC dissolution, which was effective October 29, 1999. Mr. Larsen concedes  
2 that these AURs are acceptable to the small companies to offset SWBT's concern  
3 that it should not pay for the termination of another carrier's traffic. The small  
4 companies are already receiving these records today - from the originating carrier.  
5 There is no additional benefit to be gained by the small companies in changing  
6 this record exchange process.

7  
8 Finally, if the traffic is inter-tandem routed, the tandem owner serving the  
9 terminating LEC would not have sufficient detail to prepare the AUR, because the  
10 identity of the originating carrier would not be passed to that tandem owner.

11  
12 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

13 **A. Yes.**