# DIRECT TESTIMONY

OF

RUSSELL W. MURRAY

TELECOMMUNICATIONS DIVISION

ILLINOIS COMMERCE COMMISSION

METAMORA TELEPHONE EXCHANGE

DOCKET NO. 04-0366

July 14, 2004

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

A. My name is Russell W. Murray and my business address is 527 East Capitol Avenue, Springfield, Illinois 62701.

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

A. I am employed by the Illinois Commerce Commission as a Utility Analyst in the Telecommunications Division.

**Q. Please describe your professional background**.

A. I am retired from GTE/Verizon after 30 years of service. I began my career with GTE of Illinois in 1970 as a Central Office Equipment Installer in Belvidere, Illinois. As an Equipment Installer I installed Electrical Mechanical switching equipment, Special Service Equipment, and Transmission Equipment in GTE Central Offices in Northern Illinois. In 1976, I became a Switching Technician in New Milford, Illinois. In that capacity I conducted routine maintenance and repair of Electrical Mechanical and the newer #2EAX electronic switches, as well as maintenance and repair of various PABX switching equipment. I also worked on customer related trouble. In 1984, I transferred from Belvidere, Illinois to Bloomington, Illinois to work in the Switching Services Operations Center (SSOC). There I provided technical support to the local Switching Technicians

who worked on the #2EAX and GTD5 electronic switches. I also assisted the local technicians in performing the software upgrades called System Version Releases (SVRs). The SSOC not only provided first line support but also was the alarm-monitoring center as well as call out center for Illinois during off hours. SSOC personnel, of which I was one, were on call seven days per week, twenty four hours per day.

In 1987, I become an Instructor for GTE North, located in Bloomington, Illinois. In that capacity, I instructed Management and Craft personnel on various technical and operational characteristics of the GTD5 electronic switch. In 1990, I returned to the Technical Support group. Again, I was responsible for providing technical support not only to the Local Technicians but also to the group's own Support Technicians. I also provided technical support and undertook Test Engineering functions for the GTE's Equipment Installation group. In addition, I was responsible for undertaking office conversions on several 5ESS switches throughout Illinois. I helped develop and train the Local Technicians on ADSL Testing in GTE North and provided technical support for the ATM network. Further, I have worked on Local Number Portability (LNP) and helped to develop the Fiber Restoration Procedures for GTE North.

**Q. What is the purpose of your testimony in this proceeding?**

A. The purpose of my testimony is to address the technical aspects associated with porting a telephone number from a wireline carrier to a wireless carrier.

**Q. Have you reviewed the testimony of Metamora Telephone Company ("Metamora") witness Jason Hendricks?**

A. Yes.

**Q. Has Metamora raised any concerns regarding its ability to port a telephone number to a wireless carrier?**

A. Yes. Mr. Hendricks identifies two ways for Metamora to deliver a call made by one of its subscribers to a former Metamora subscriber who has ported his telephone number to a wireless carrier. First, according to Mr. Hendricks, Metamora can technically deliver ported calls to wireless carriers' points of interconnection at the tandem in an exchange of another local exchange carrier.[1] Mr. Hendricks, however, asserts such calls are interexchange calls because Metamora must route the calls out of its local service area to the tandem in an exchange of another local exchange carrier.[2] Mr. Hendricks further asserts that Metamora lacks authority to deliver such calls under state law because it lacks a

[1] Metamora Ex. 1.0 (Hendricks Direct), at 15.

69 certificate of interexchange authority.[3] Second, according to Mr. Hendricks, "the
70 only other technical way for a wireless-to-wireline LNP call to be completed is for
71 Metamora to route the call to the customer's presubscribed interexchange
72 carrier, which would result in the customer being charged for a toll call."[4]
73
74 **Q. Do you agree with Mr. Hendricks' assessment of the handling of a wireline**
75 **to a ported wireless call?**
76 **A.** No.
77
78 **Q. What is your understanding of the way the call will be handled?**
79
80 A. As I have previously testified to in the Alhambra-Grantfork Docket (03-0732), my
81 understanding of how a call from a Metamora wireline subscriber to a former
82 Metamora customer who has ported his or her telephone number to a wireless
83 subscriber is handled is as follows:
84 1. If Metamora ports a number to a wireless carrier, that ported customer keeps
85 his or her Metamora NPA-NXX[5] but the number is assigned to the wireless
86 carrier.

---

[2] Id.
[3] Id.
[4] Id. at 16.
[5] The Numbering Plan Area or "NPA" is commonly known as the area code. It refers to the first three of a ten-digit telephone number (NPA-NXXX-XXXX). An NXX code refers to the second three digits, where N represents any one of the numbers 2 through 9 and X represents any one of the numbers 0 through 9. See 47 C.F.R. § 52.7(c). It is assigned to a specific rate center for the purpose of identifying the rate center for routing and rating purposes.

87 2. When a Metamora wireline subscriber calls the ported number of the wireless
88 subscriber, the Metamora Northern Telecom (Nortel) DMS-10 switch recognizes
89 that the number has been ported.
90 3. The Metamora DMS-10 switch performs an SS7 (Signaling System 7) query
91 to determine where and how to route the call.
92 4. The SS7 look up table tells the Metamora DMS-10 switch to route the call to
93 the common final trunk group connected to the tandem switch. The tandem then
94 routes the call to the wireless carrier's trunk group.
95 5. The Metamora DMS-10 switch uses its routing and billing tables associated
96 with the NPA-NXX to determine that the call is a local call. Also, note that when
97 a Metamora wireline subscriber calls a wireless subscriber (with an NXX code
98 assigned to a rate center outside of the Metamora rate center), that call is a toll
99 call. Thus, calls to foreign NXX codes (i.e. those telephone numbers with an
100 NXX not assigned to the Metamora rate center) will continue to be toll calls.
101
102 **Q. Does that mean Mr. Hendricks is incorrect in his assumptions regarding**
103 **toll billing?**
104
105 **A.** Not necessarily. It only means my understanding of the situation and my past
106 experience do not support Mr. Hendricks' concern over toll billing to a ported
107 local NPA-NXX. If Mr. Hendricks provides specific examples and explains how
108 the process is different from my understanding, I will consider that information
109 and reevaluate my conclusion.

110

111 **Q. Do you believe that it is technically feasible for Metamora to implement**
112 **wireline to wireless LNP?**

113

114 A. Yes. In fact, Mr. Hendricks identifies two ways for delivering calls from its
115 subscribers to customers who have ported their numbers to wireless carriers
116 The first way requires the delivery of ported calls to wireless carriers' points of
117 interconnection at the tandem.[6] This solution requires Metamora to use a trunk
118 group that would interconnect to the wireless carrier at the point of
119 interconnection at the tandem. This is a feasible solution.

120

121 **Q. What is the second way Mr. Hendricks has identified for completing a**
122 **ported call to a wireless carrier?**

123

124 A. According to Mr. Hendricks, the second way is to route the call to the calling
125 customer's presubscribed interexchange carrier, which would result in the
126 customer being charged for a toll call.[7]

127

128 **Q. Do you have any concerns with this type of technically feasible solution**
129 **identified by Mr. Hendricks?**

130

[6] Metamora Ex. 1.0 (Hendricks Direct), at 15.
[7] Id. at 16.

A. Yes. I do not believe that a call between two numbers within the same exchange is an interexchange call. Therefore, routing of such a call to an interexchange carrier in which a customer would be charged for a toll call is improper.

**Q. Can you summarize the way that it is technically feasible to complete a call from a wireline customer to a ported wireless customer?**

A. Yes. Metamora can deliver such calls on its existing switched trunks to the tandem switch for delivery to the wireless carrier. Alternatively, Metamora can establish direct, non-switched trunks from Metamora to the wireless carrier.

**Q. Mr. Hendricks claims that the FCC has required Metamora to provide a service that it lacks authority provide. Do you agree?**

A. No. Although I am not an attorney, I do not believe that implementing wireline-to-wireless LNP as I have described requires Metamora to provide an interexchange service that it lacks authority to provide. A call between two numbers within the same exchange, regardless of how it is routed, is a local call.

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

A. Yes.