

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 04-0469

**Direct Testimony of Carl C. Albright Jr.
On Behalf of SBC Illinois**

SBC Illinois Exhibit 2.0

August 17, 2004

PUBLIC VERSION

ISSUES
**NIM 1-6, 8, 9, 13, 14, 15, 16, 17,
18a, 18b, 19a, 21, 22, 28, 31, 32**

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1 **DIRECT TESTIMONY OF CARL C. ALBRIGHT JR.**

2 **ON BEHALF OF SBC ILLINOIS**

3 **I. INTRODUCTION**

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

5 A. My name is Carl C. Albright, Jr. My address is Three SBC Plaza Room 710.A4, Dallas,
6 Texas 75202.

7
8 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

9 A. I am employed by SBC Operations as Area Manager-Network Regulatory.
10

11 **Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL**
12 **BACKGROUND?**

13 A. I have been employed by SBC for 25 years. My entire career has been on the Network
14 side of SBC starting with Network Distribution in outside installation, repair, and
15 maintenance, after which I spent time in Network Operations in the Central Office
16 Special Services group. I also supported Network Operations as a technical instructor for
17 SBC for 5 years developing and delivering broadband transport courses, from
18 fundamental fiber optics to advanced SONET, as well as DCS and SS7. I also worked
19 with SBC Wireless (now called Cingular) for 4 years managing the development,
20 implementation, measurement and evaluation of technical training for the SBC Wireless

21 Network Operation's organization. I have a Bachelors Degree in Management from
22 Lamar University, Beaumont, TX.

23

24 **Q. HAVE YOU TESTIFIED BEFORE ANY STATE COMMISSIONS BEFORE?**

25 A. Yes. I have testified before the Michigan Commission in the McLeod arbitration
26 proceeding. I have also testified before the Texas Commission in the EPN arbitration
27 (Docket No. 25188), the Fitch Affordable Arbitration Docket No. 29415, and the Texas
28 Mega Arbitration Docket No. 28821.

29

30 **II. PURPOSE OF TESTIMONY**

31 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

32 A. My testimony will address the following issues:

- 33 Trunking
- 34 NIM Issues 5, 15, 19, 30
- 35 Meet Point Trunking
- 36 NIM Issues 21, 23
- 37 Points of Interconnection
- 38 NIM Issues 9, 14
- 39 Interconnection Methods
- 40 NIM Issues 16, 18
- 41 Facilities Requirements
- 42 NIM Issues 13, 17
- 43 Operational Issues
- 44 NIM Issues 28
- 45 Transit traffic
- 46 NIM Issue 31
- 47 FX Traffic
- 48 NIM Issue 22

49 Out of Exchange Traffic
50 NIM Issue 32

51 Definitions
52 NIM Issues 1, 2, 3, 4, 6, 8

53 The remaining NIM issues are addressed by the following SBC Illinois witnesses:

54 NIM issues 11, 12, 19(b), 20 and 33 -- Scott McPhee;

55 NIM issue 33 – Mike Kirksey

56 NIM issues 24, 25 and 26 –Marc Novack

57

58 **III. TRUNKING**

59 **NIM Issue 5** - Which Parties' definition of "Local Interconnection Trunk Group" should be
60 included in the Agreement?

61

62 **NIM Issue 15** – Should MCI be required to trunk to every Tandem in the LATA?

63

64 **NIM Issue 19a** – What is the proper routing, treatment and compensation for interexchange
65 traffic that terminates on a Party's circuit switch, including traffic routed or transported in whole
66 or part using Internet Protocol?

67

68 **NIM Issue 30** –Should SBC Illinois be required to provision trunk augments within 30 days?

69

70 **Q. WHAT ARE THE GENERAL TOPICS YOU ADDRESS IN THIS SECTION?**

71 A. There are two over-arching issues in this NIM Appendix: 1) where the parties will
72 exchange traffic between their networks; and 2) the type of traffic the parties will place
73 on the tandem trunk groups that connect their networks. This section of my testimony
74 will address the topics related to what type of traffic should be combined over tandem
75 trunk groups. The topics I will cover are: 1) The different classifications (or types) of
76 traffic, 2) the definition of trunks and how they are different from facilities, and 3) how
77 MCI should separate traffic over trunk groups in order to properly track and bill and
78 avoid the potential for blocked calls.

79

80 **ISSUE 15**

81 **Q. WHAT IS THE DISPUTE IN NIM ISSUE 15?**

82 A. SBC Illinois proposes language in sections 8.7 and 8.8 that would require MCI to
83 establish trunks (not facilities) to each tandem in a LATA. MCI opposes this language
84 and proposes language in section 3.3 that would permit it to establish trunk groups to a
85 single tandem, thus forcing SBC Illinois to switch calls at more than one tandem and
86 exacerbate tandem exhaust.

87

88 **Q. HOW SHOULD MCI CONNECT TO SBC ILLINOIS' NETWORK IN A LATA**
89 **WITH MORE THAN ONE TANDEM?**

90 A. MCI should first establish its Points of Interconnection ("POIs") with SBC Illinois in the
91 LATA. Next, MCI should establish trunk groups that directly connect to each SBC
92 Illinois Tandem within the LATA.

93

94 **Q. IF MCI HAS ESTABLISHED A POI IN THE LATA, WHY SHOULD MCI THEN**
95 **CONNECT TO EVERY SBC TANDEM IN A MULTI-TANDEM LATA?**

96 A. The POI establishes the point at which SBC Illinois and MCI facilities meet to
97 interconnect our two networks. Trunk groups are then established over these facilities so
98 that traffic can be exchanged between the two networks. Each tandem serves the end
99 offices that sub-tend it. If MCI only establishes a trunk group to the tandem that is near
100 the POI, SBC Illinois must then deliver calls to its end users that are served by the other

101 tandems, using intertandem switching. This places additional burdens on SBC Illinois'
102 tandem resources and is not an efficient method of delivering calls from MCI to the other
103 SBC Illinois end users. When MCI establishes direct trunk groups to each SBC Illinois
104 Tandem within the LATA, the network functions more efficiently and scarce tandem
105 resources are preserved.

106 **Q. ARE CALLS CARRIED OVER TRUNKS OR FACILITIES?**

107 A. Both. However, there is an important difference between a trunk and a facility.

108 **Q. PLEASE EXPLAIN.**

109 A. A facility is a physical medium used to connect two points on a network. Usually this
110 physical facility is fiber or copper cable. In the interconnection environment, a facility
111 links two networks and creates an end-to-end facility path that will allow each company
112 to establish the trunking network between their switches. It is common to see facilities
113 referred to in terms such as DS1, DS3, OC3, OC12, etc.

114
115 Trunks are ports on a switch used to create a dedicated talk path from one switch to
116 another. Between switches there is typically a need for more than one talk path so
117 multiple trunks can be grouped together in software in what is referred to as a Trunk
118 Group. Each Trunk Group is dedicated for calls between the two switches. When an end
119 user served by one switch wants to call an end user served by another switch, the
120 originating switch routes the call (based on the NPA-NXX of the end user being called)
121 to a particular Trunk Group. Within the Trunk Group, an idle trunk is identified and is

122 then dedicated to that call for the duration of the call. Consequently, no other call can use
123 that trunk until the current call is completed.

124

125 **Q. ARE CARRIERS ALWAYS CLEAR ABOUT THE DISTINCTION BETWEEN**
126 **THESE TWO THINGS?**

127 A. No. Some CLECs incorrectly use the two terms interchangeably, saying they have
128 facilities to a certain location when in fact they have trunks to a location and the
129 underlying facilities belong to SBC Illinois. While trunks require a facility so that SBC
130 Illinois and MCI can exchange traffic, this is just one use of a facility. Facilities are used
131 to connect many types of communications devices, i.e. burglar alarm systems or
132 computers.

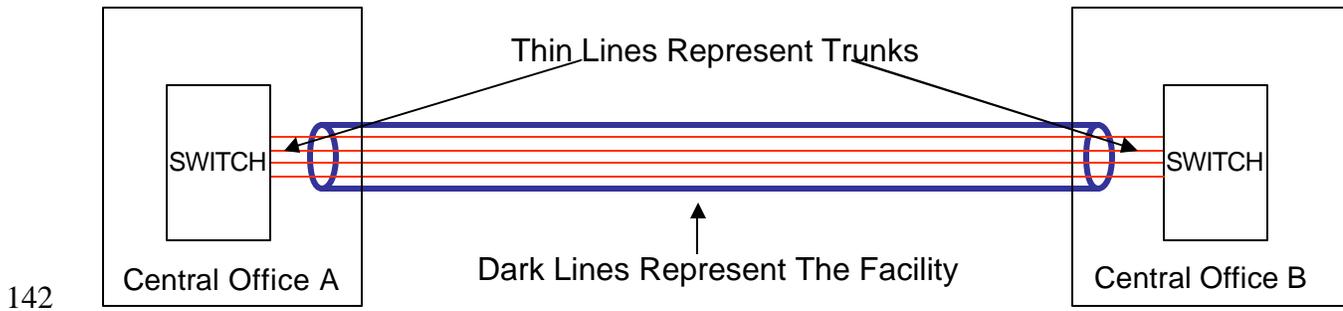
133

134 **Q. CAN YOU ESTABLISH TRUNKS BETWEEN END OFFICES WITHOUT A**
135 **FACILITY?**

136 A. No. Trunks ride over facilities. Without a facility to ride, a path (trunk) for calls between
137 switches cannot be established. Similarly, simply having a facility between two points is
138 not enough to complete a call. A trunk must ride the facility for a call to be completed.
139 Trunks and facilities work hand-in-hand so calls can be completed.

140

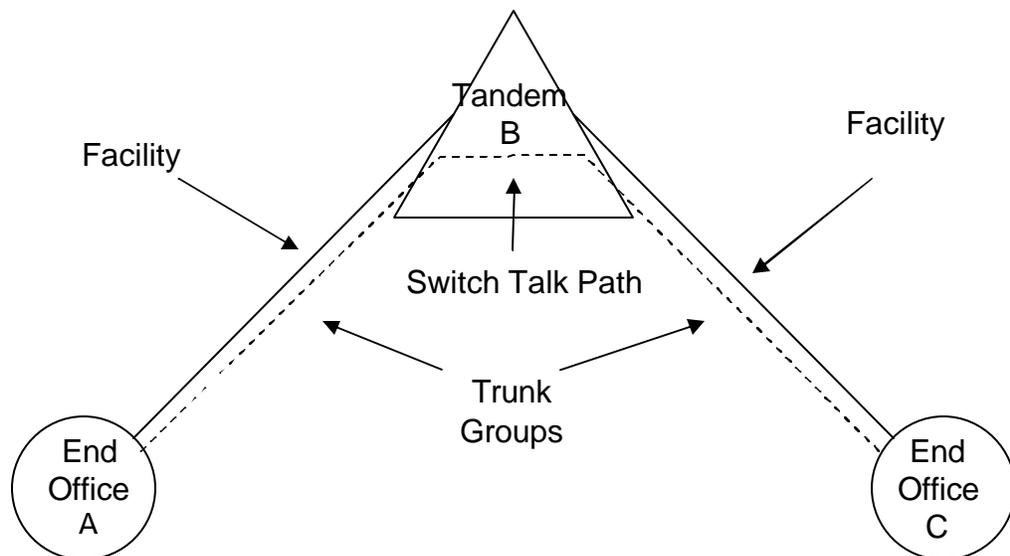
141 The distinction between a trunk and a facility is best described in the illustration below.



143 In this illustration one can see that a physical facility (e.g. DS1, DS3) exists between
144 Central Office A and Central Office B (the dark lines). Trunks (the thin lines) are then
145 provisioned over the facility to establish the talking path between the two switches.
146

147 **Q. CAN YOU DESCRIBE HOW A CALL IS MADE BETWEEN TWO SWITCHES**
148 **THAT DO NOT HAVE DIRECT FACILITIES OR TRUNKS?**

149 A. Yes. To understand how that type of call is made let me provide an illustration.



151 In this illustration, the two end offices utilize a tandem switch to set up calls between
152 their respective customers. There is a facility and a trunk group established between end
153 office “A” and the tandem office “B.” There is also a facility and a trunk group between
154 end office “C” and the tandem office “B.” Both facilities are cross-connected to the
155 tandem and use the tandem switch to complete calls between the two offices. With no
156 facility directly connecting end offices “A” and “C,” calls between these two offices
157 require the use of two separate facilities. Also, with no trunk group directly connecting
158 end offices “A” and “C,” calls between these two offices require the use of two separate
159 trunk groups and additional switching at the tandem. The illustration that shows that
160 trunk paths can (and usually will) require the use of multiple facilities.

161

162 **Q. WHY IS THE DISTINCTION BETWEEN TRUNKS AND FACILITIES**
163 **IMPORTANT TO SBC ILLINOIS’ PROPOSAL FOR ISSUE 15?**

164 A. SBC Illinois proposes that MCI establish *trunks* to each SBC Illinois tandem. This does
165 not mean that MCI would have to provide physical *facilities* to each tandem. It only
166 means that MCI would have to set up call paths in its switch software so that traffic
167 destined to a certain SBC Illinois end office is directed to the SBC Illinois tandem that
168 serves that end office. Without this arrangement, SBC Illinois is required to switch the
169 call three times instead of just twice – once at the initial tandem, another time at the
170 tandem serving the end office and a third time at the end office.

171

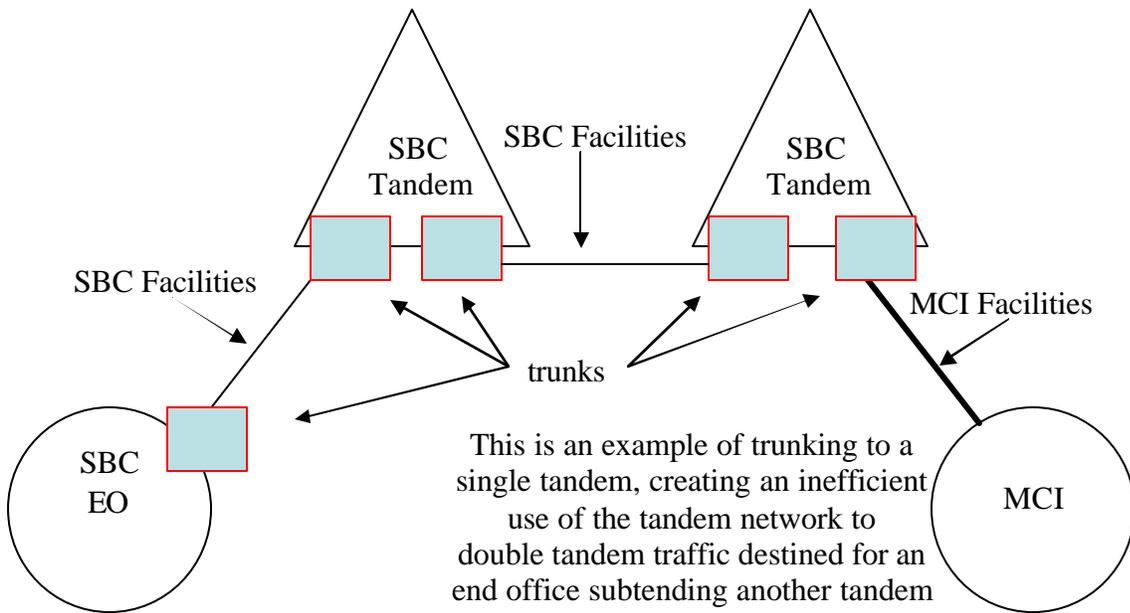
172 **Q. WHO IS RESPONSIBLE FOR THE FACILITIES FOR THESE TRUNK**
173 **GROUPS?**

174 A. SBC Illinois is responsible for the facilities on its side of the POI, and MCI is responsible
175 for the facilities on its side of the POI.

176

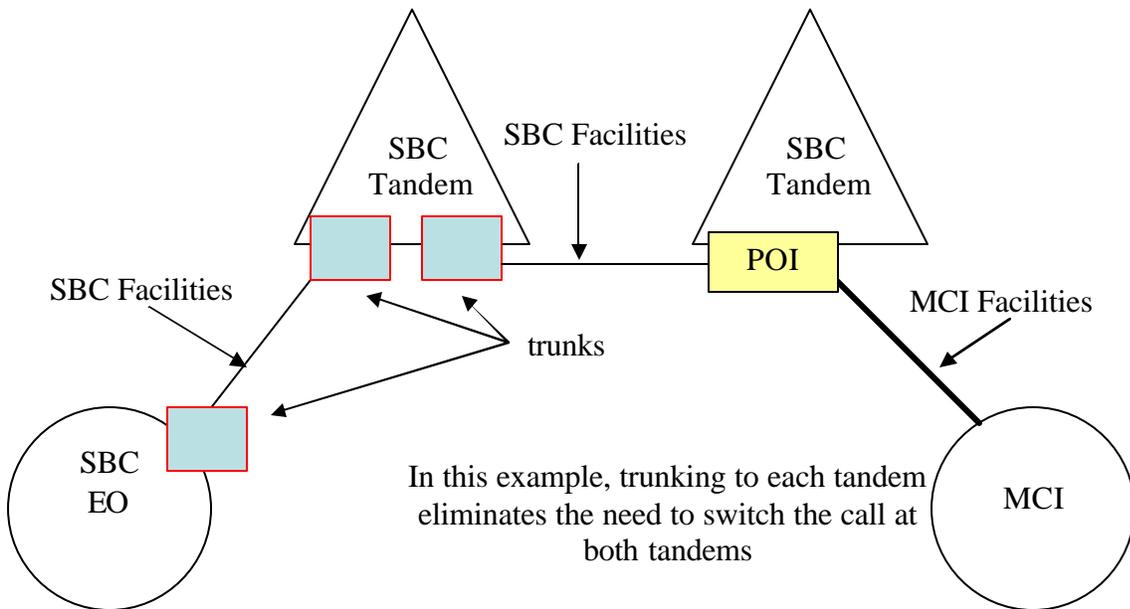
177 **Q. DOESN'T TRUNKING TO EVERY TANDEM INCREASE THE COST OF**
178 **FACILITIES TO MCI?**

179 A. No. Suppose there are two SBC Illinois tandems in a LATA and MCI establishes a POI
180 at one of those tandems. MCI provides the facilities to that POI. SBC Illinois pays for
181 the facilities required to deliver traffic to the other tandem on its side of the POI. If MCI
182 were to establish a single 48 trunk group to the first tandem, the SBC Illinois tandem
183 resources would be inefficiently used to "double tandem" calls from/to MCI end users
184 served by the second tandem. If instead MCI established trunks to both tandems - for
185 example, 24 trunks to each tandem - the facility requirements would remain the same.
186 However, SBC Illinois' tandem resources would be more efficiently utilized allowing
187 SBC Illinois to more effectively manage network reliability. The drawings below
188 illustrate this point.



189

190



191

192

193

194

Even when MCI establishes *trunking* to both tandems, it only provides *facilities* to one.

Q. WHAT IS THE BENEFIT OF SBC ILLINOIS' PROPOSAL?

195 A. Double-tandeming traffic is expensive and inefficient. It also contributes to the severe
196 tandem exhaust situation faced by SBC Illinois in the Chicago LATA. SBC Illinois'
197 proposal minimizes this problem for the public switched network.

198
199 Moreover, proper routing of the traffic per the Local Exchange Routing Guide is
200 necessary to ensure the calls are successfully completed. For instance, local traffic
201 should be routed to the appropriate Local or Combination Tandem. Misrouting local
202 traffic to an Access Tandem is an inefficient use of Access Tandem resources and it
203 creates a potential for blocked calls. The same is true for an IXC-carried IntraLATA or
204 InterLATA call. A Local Tandem is not set up to process the information included in an
205 IXC-carried call to allow the IXC to properly track and bill. In this situation, the call
206 would be blocked.

207
208 **Q. PLEASE EXPLAIN WHAT YOU MEAN BY TANDEM EXHAUST?**

209 A. Before 1996, the Chicago LATA was adequately served by three tandems. That number
210 has grown over the last eight years to 14 tandems. By 2005, the original three tandems
211 will be exhausted, meaning they will have exhausted all available trunks. Without
212 tandem relief, four additional tandems will exhaust by 2007. Attached to this testimony
213 as Schedule CCA-1 (confidential) is a presentation entitled "Chicago Tandem Status
214 2003" which provides more detail about this problem.

215 Tandem exhaust is caused by a number of things. First, the more tandems there
216 are, the less efficient they become because each tandem must interconnect to every other
217 tandem in the LATA. Intertandem trunk groups grows exponentially as tandems are

218 added. As an example, two tandems in a LATA would require only one intertandem
219 trunk group to connect them. If the number of tandems in the LATA grows to four, six
220 intertandem trunk groups are required to connect them. At ten tandems in the LATA, 45
221 trunk groups are needed just for intertandem trunking. The 14 tandems in Chicago are
222 only capable of 60% efficiency because of the large number of intertandem trunks
223 required to connect each tandem in the LATA to every other tandem.

224 Second, incorrect routing erodes tandem efficiency as the intertandem trunk
225 groups must grow to support the rerouting of misdirected traffic. Finally, high call
226 volumes between end offices can exhaust tandem trunking resources. For this reason,
227 Direct End Office Trunks (sometimes called “DEOTs”) are established directly between
228 high traffic volume end offices once traffic between them reaches sufficient levels.

229

230 **Q. DOES MCI RECOGNIZE THE EFFICIENCY AND DESIRABILITY OF**
231 **TRUNKING TO EACH TANDEM?**

232 A. Yes. MCI’s position is internally inconsistent. On the one hand, MCI objects to SBC
233 Illinois’ language for section 8.7 and 8.8, but on the other hand MCI has proposed
234 language for section 7.1.1.1 that would require separate trunk groups in certain
235 situations.¹ More to the point, MCI has already agreed to language in sections 9.1 and

¹ DPL NIM Issue 19 – MCI proposed language at 7.1.1.1 – “When there are separate SBC Illinois access and local tandems in an exchange, a separate local trunk group will be provided to the local tandem and a separate intraLATA toll trunk group will be provided to the access tandem. When there are multiple SBC Illinois combined local and toll tandems in an Exchange Area, separate trunk groups will be established to each tandem.”

236 9.2, that requires separate trunks for local/intraLATA traffic and Interexchange Carrier
237 (IXC) carried intraLATA/interLATA traffic.²

238

239 **Q. HOW SHOULD THE COMMISSION RULE ON THIS ISSUE?**

240 A. The Commission should adopt SBC Illinois' proposal because it most efficiently uses the
241 resources of the public switched network.

242

243 **ISSUE 19**

244 **Q. WHAT IS THE DISPUTE IN NIM ISSUE 19?**

245 A. MCI proposes language in section 7.1.1 that would permit it to combine originating local
246 and intraLATA toll traffic with interexchange access traffic on a single trunk group.
247 SBC Illinois opposes this language and requests the Commission to follow its precedent
248 requiring carriers to establish separate trunk groups for jurisdictionally distinct traffic.

249

250 **Q. PLEASE DESCRIBE THE THREE TYPES OF SWITCHED TRAFFIC THAT IS**
251 **EXCHANGED BETWEEN THE PARTIES.**

252 A. Because different types of traffic are subject to different compensation treatment, SBC
253 Illinois and most other LECs route switched traffic based on three separate categories:
254 "Local" traffic, "IntraLATA" traffic and "InterLATA" traffic.

255

² NIM DPL Issue 12 – MCI language at 9.2 – “The Parties will establish separate trunk groups to each SBC Illinois Access Tandem under which MCI’s NXX’s home.”

256 **Q. WHAT IS LOCAL TRAFFIC?**

257 A. Local Traffic consists of calls originated and terminated between subscribers within
258 “Band A” and “Band B”, i.e., calls to all customers served by COs within 15 miles of the
259 calling party’s CO. Local calls are defined in the Agreement as Section 251(b)(5)
260 traffic and are subject to reciprocal compensation and are carried over Local
261 Interconnection Trunk Groups.

262
263 **Q. PLEASE DESCRIBE THE DISTINCTION BETWEEN INTRALATA TOLL**
264 **TRAFFIC AND INTRALATA ACCESS TRAFFIC.**

265 A. IntraLATA Toll Traffic is traffic originated and terminated within a LATA carried SBC
266 Illinois on behalf of its end users, or by MCI on behalf of its end users.

267
268 IntraLATA Access Traffic is traffic within a LATA carried by an IXC. Access traffic is
269 routed to an IXC for completion. The IXC pays the originating carrier and the
270 terminating carrier either originating or terminating “access” charges for use of their
271 network components associated with that type of traffic. Customers can use their
272 Presubscribed Interexchange Carrier (“PIC”) and dial as a 1+ call or use a dial-around
273 code on a per-call basis, i.e. 101-XXXX³ to select an IXC other than the PIC they had
274 chosen as their default IXC.

³ The breakdown of these digits are as follows: 101 is an access code or prefix digits to instruct a switch that a subscriber is overriding their PIC on a one call basis, XXXX is the Carrier Identification Code (CIC) that is assigned to the particular IXC that will handle the call. CIC is used in a global sense within the entire switch to define an IXC, with the attributes of routing each call type the IXC provides to a particular trunk group, while PIC is used to identify the IXC an individual subscriber has selected.

275

276 **Q. WHAT IS INTERLATA TRAFFIC?**

277 A. InterLATA Traffic consists of calls originated by subscribers in one LATA that are
278 destined to subscribers in another LATA. InterLATA calls are delivered to the
279 originating subscriber's IXC. The IXC delivers the call to the terminating subscriber's
280 telephone service provider in the other LATA. Calls between the local exchange carrier
281 and the IXC are carried over access trunks.

282

283 Frequently, two local exchanges (such as MCI and SBC Illinois) will cooperate to
284 provide switched access to an IXC. For example, an interLATA call may be initiated by
285 an MCI customer, then routed by MCI over a Meet Point Trunk Group to the SBC
286 Illinois network, which are then delivered over SBC Illinois trunks to an IXC. In that
287 case, MCI provides part of the switched access facilities for its trunking requirements,
288 and SBC Illinois provides the facilities for its trunks.

289

290 **Q. HOW DOES SBC ILLINOIS PROPOSE TRAFFIC BE SEGREGATED AND**
291 **ROUTED?**

292 A. SBC Illinois proposes a set of "local interconnection trunk groups" to carry local and
293 intraLATA toll traffic. (See section 1.10).⁴ We also propose a separate set of trunks to
294 carry IXC-carried intraLATA and interLATA traffic (See section 9.1 and 9.2).

⁴ Under SBC Illinois' proposal for section 1.10, the Local Interconnection Trunk Group will carry i) Section 251(b)(5) Traffic, (ii) ISP-Bound Traffic, (iii) IntraLATA toll Traffic originating from an end user obtaining local dial tone from MCI where MCI is both the Section 251(b)(5) Traffic and IntraLATA

295

296 **Q. HAS MCI ALREADY AGREED IN PRINCIPLE TO THIS PROPOSAL?**

297 A. Yes. Both MCI and SBC Illinois have agreed to language that addresses segregating IXC-
298 carried IntraLATA and InterLATA traffic from Local and IntraLATA toll traffic in
299 sections 9.1 and 9.2.

300 9.1 IXC-carried intraLATA and interLATA toll traffic shall be transported
301 between MCI's Central Office and SBC Illinois' Access Tandem over a
302 "Meet Point" Trunk Group separate from *Local and IntraLATA Toll*
303 **Section 251(b)(5)/IntraLATA Traffic** traffic. InterLATA trunk groups
304 will utilize SS7 signaling, except Multi-Frequency ("MF") signaling will be
305 used on a separate "Meet Point" trunk group to complete originating calls to
306 switched access customers that use MF FGD signaling protocol.

307 9.2 Meet Point Interconnection Trunk Groups will be established between
308 MCI's Switch and SBC Illinois' Access or Combined Local Access
309 Tandem to transport InterLATA traffic separate from *Local and IntraLATA*
310 **Toll Section 251(b)(5)/IntraLATA Traffic** traffic. The Parties will
311 establish separate trunk groups to each SBC Illinois Access Tandem under
312 which MCI's NXXs home.

313 There remains a disagreement over whether the term used to refer to local traffic should
314 be MCI's proposal ("Local and IntraLATA Toll") or SBC Illinois' proposal ("Section
315 251(b)(5)/IntraLATA Traffic"), but that dispute does not detract from the fact that MCI
316 has already agreed that separate trunk groups should be established. The Commission
317 should build on this agreed language and should prevent MCI from creating ambiguity on
318 this point with its proposal for sections 1.10 and 7.1.

319

320 **Q. WHY ARE THESE SEPARATE TRUNKS GROUPS NECESSARY?**

toll provider, and/or (iv) IntraLATA Toll Traffic originating from an end user obtaining local dialtone from SBC ILLINOIS where SBC-ILLINOIS is both the Section 251(b)(5) Traffic and IntraLATA toll provider.

321 A. This separate trunking is needed for the accurate tracking and billing of traffic exchanged
322 between carriers. This is a well-established principle in past Commission arbitrations.
323 For example, in its order in ICC Docket No. 96-0404 dated August 4, 1997, the
324 Commission held that nonjurisdictional trunks and percentage factors are not reasonable.
325 In that order, the Commission concluded in Section IIIB1d:

326 The Commission finds that Ameritech provides interconnection to
327 requesting carriers at all points required for the transmission and
328 routing of telephone exchange traffic, exchange access traffic, or
329 both, in accordance with the applicable FCC Regulations.
330 47 C.F.R. §51.305. . . . The Commission further finds that the
331 trunking options Ameritech provides are consistent with its
332 obligation to transmit and route exchange access traffic.
333 Ameritech provides one-way or two-way trunks for the purpose of
334 integrating the end offices and/or tandem offices of carriers for the
335 completion of local switched and interLATA toll traffic. As part
336 of the options provided, Ameritech requires that CLECs use TCTs
337 [Toll Connecting Trunks] to carry interLATA toll-switched traffic.
338 We agree with Ameritech's contention that, if nonjurisdictional
339 trunks were used, neither Ameritech nor any other carrier would be
340 able to isolate or measure the volumes of each type of traffic that
341 terminates over a single trunk group, which in turn would
342 necessitate the use of estimated, percentage factors in lieu of actual
343 measurements to create a bill. Such billing arrangements are not
344 commercially reasonable or cost effective in the present market, as
345 they would require extensive modifications to both Ameritech's
346 billing systems for reciprocal compensation and its systems for
347 billing IXC access charges. Ameritech's trunking options, in
348 contrast, permit each carrier to bill the originating carrier for actual
349 minutes of use and actual rates at the time the call was made. We
350 so found in the MCI and Sprint arbitrations, noting that it was not
351 possible to obtain accurate measurements over combined trunk
352 groups and stating in the Sprint decision that "Sprint will not be
353 unduly impeded from competing in the local market by the
354 adoption of Ameritech's proposed solution." *Sprint Arbitration*
355 *Decision*, 96-AB-008, at 6; *MCI Arbitration Decision*, 96-AB-006,
356 at 14-15.

357 In Docket 96-0404, as well as in the Sprint and MCI arbitrations cited in that docket, the
358 Commission found that SBC Illinois' interconnection arrangement with CLECs was

359 satisfactory in meeting its obligations under the Act. Nothing has changed since those
360 decisions that would invalidate that conclusion.

361 **Q. HAS THE COMMISSION RECENTLY ADDRESSED THIS ISSUE?**

362 A. Yes. In the AT&T arbitration decided last year in Docket 03-0239, the Commission re-
363 affirmed its ruling that it is appropriate to establish jurisdictionally separate trunk groups.
364 Mr. Price acknowledges this Commission ruling that AT&T could not combine local
365 traffic over Feature Group D trunks.⁵ Mr. Price also concedes that combining
366 jurisdictionally distinct traffic does indeed add complexity to SBC Illinois' intercarrier
367 billing.⁶

368

369 **Q. HOW SHOULD THE COMMISSION RULE ON ISSUE 19?**

370 A. The Commission should adopt SBC Illinois' language that preserves in place the status
371 quo in Illinois in which local and intraLATA toll traffic is placed on trunk groups
372 separate from IXC-carried intraLATA and interLATA traffic. This includes SBC
373 Illinois' proposed language for sections 1.10 and 7.1.

374 **Issue 30**

375 **Q. WHAT IS THE DISPUTE CONCERNING TRUNK ORDER AUGMENTS IN NIM**
376 **ISSUE 30?**

377 A. The main dispute is the statement "*in any event shall not be longer than thirty days*", as
378 this does not allow consideration of conditions outside of SBC Illinois' control, (e.g., no

⁵ See Price Direct at page 33, line 864 through page 34, line 874

⁶ See Price Direct, page 34, lines 875 - 877

379 facilities, trunk availability, catastrophic event). Another problem is when working on a
380 major project that typically requires more than the standard interval, since great care must
381 be taken to insure the project completes without incident, additional time may be
382 warranted. Mr. Price argues that a provisioning period of thirty days is appropriate.⁷ He
383 fails to mention the “in any event” language. SBC Illinois usually works under a 20-
384 business day *guidelines*, not an absolute requirement.

385

386 **ISSUE 5**

387 **Q. WHY SHOULD THE COMMISSION ADOPT SBC ILLINOIS’ PROPOSED**
388 **DEFINITION OF “LOCAL INTERCONNECTION TRUNK GROUP”**

389 A. The issue is whether the term should be defined to include interLATA traffic and transit
390 traffic. SBC Illinois contends that it should not. As I discuss above, local traffic and
391 interLATA traffic should be carried over separate trunks. Moreover, transit traffic should
392 not be placed on the local/intraLATA toll trunk group because the tandems that support
393 Local Interconnection Trunk Groups are designed and provisioned to support local
394 traffic, which is identified under the Act in Section 251(b)(5) as traffic eligible for
395 reciprocal compensation. The language proposed by MCI would create routing
396 inefficiencies in the tandem network and subject such misrouted traffic to blocking. SBC
397 Illinois must be able to efficiently manage its network reliability and MCI should not be
398 allowed to misroute its traffic in an effort to avoid its obligations to deliver traffic per the
399 Local Exchange Routing Guide (LERG).

⁷ See Price Direct at page 96, lines 2563 - 2567

400

401 **IV. MEET POINT TRUNKING**

402 **NIM Issue 21** - Should MCI be required to establish a Meet Point Trunk Group to each
403 SBC-13STATE Local/Access or Access tandem switch where MCI has homed it's
404 NXX codes?
405

406 **Q. WHAT ISSUE WILL YOU BE DISCUSSING IN THIS SECTION?**

407 A. This section of my testimony will address Meet Point trunking, which are trunks for IXC-
408 carried intraLATA and interLATA traffic for the benefit of MCI's end user customers.
409 The issue presented here is similar to NIM 15, namely, MCI's duty to establish trunks to
410 each tandem in a LATA. In this context, however, the language applies only to meet
411 point traffic and only to Access Tandems. (section 9.4).
412

413 **Q. DOES THIS CHANGE THE ANALYSIS?**

414 A. MCI suggests that it may hand off its IXC-bound traffic anywhere MCI chooses on SBC
415 Illinois' network, and then require SBC Illinois to deliver MCI's traffic to the SBC
416 Illinois Access tandem where the IXC is connected.⁸ This is wrong. MCI should hand-
417 off access traffic at SBC Illinois' Access Tandems. Meet Point Traffic is access traffic –
418 it is traffic bound for an IXC for the benefit of MCI end users. Like transit traffic, it
419 neither originates nor terminates on SBC Illinois' network. MCI should be solely
420 responsible for transporting its end user access traffic to the IXCs. Of course, SBC

⁸ NIM DPL MCI Position Statement Issue 21: "The Act is clear as is the FCC's rules on this issue – there is only one POI required for any given LATA and MCI is not responsible for any of the costs of traffic that originates on SBC's side of that POI when that traffic is delivered to MCI."

421 Illinois is willing to accept that traffic at its Access Tandems, but MCI should be
422 responsible for handing off the traffic at our Access Tandems.

423

424 **Q. ARE SBC ILLINOIS' END USERS ABLE TO ORIGINATE OR TERMINATE**
425 **CALLS OVER MCI'S MEET-POINT TRUNK GROUPS AS STATED IN MCI'S**
426 **POSITION STATEMENT FOR ISSUE 21?**

427 A. No. These trunk groups are specifically designed to serve MCI's end users and are solely
428 for the benefit of MCI's end users and MCI.

429

430 **Q. WHY SHOULD MCI BE RESPONSIBLE FOR THE FACILITIES USED TO**
431 **CARRY ITS MEET-POINT TRAFFIC?**

432 A. Interconnection between a CLEC and SBC Illinois is for the mutual exchange of Section
433 251(b)(5) traffic between MCI's end users and SBC Illinois' end users. The services
434 provided through meet-point trunk groups neither originate nor terminate to SBC Illinois'
435 end users and, therefore, do not qualify as Section 251(b)(5) traffic. MCI should be
436 solely responsible for the trunks and underlying facilities necessary to provide such
437 services to its end users.

438

439 **Q. FROM SBC'S POINT OF VIEW, WHAT IS AN EXAMPLE OF IMPROPERLY**
440 **ROUTED TRAFFIC?**

441 A. One example of improperly routed traffic is Inter-LATA traffic that is being routed over a
442 Local Interconnection trunk group, rather than to a Meet Point trunk group to an Access
443 Tandem.

444

445 **Q. WHY IS THIS A PROBLEM?**

446 A. If MCI delivers Inter-LATA traffic to a Local Interconnection Trunk Group, rather than
447 to an Access Tandem, those calls may not be properly billed as Inter-LATA calls.
448 Instead, MCI would leave it to SBC Illinois to determine which calls to bill as Inter-
449 LATA or bill as if they are local interconnection calls. The Parties should work
450 cooperatively to correct improper routing of traffic, whether the improper routing is done
451 intentionally or inadvertently.

452

453 **V. POINTS OF INTERCONNECTION**

454 **NIM 9** - Which party's definition of points of interconnection should be included in the
455 Agreement?

456 **NIM 14 a** - Where should MCI interconnect with SBC in Illinois?

457 **NIM 14 b** - Should MCI be required to bear the cost of selecting a technically feasible
458 but expensive form of interconnection such as a single point of interconnection or a point
459 of interconnection outside the Tandem Serving Area?

460 **NIM 18 a** - Should MCI be required to interconnect on SBC's network?

461

462 **Q. BEFORE YOU ADDRESS EACH ISSUE, DO YOU HAVE ANY GENERAL**
463 **OBSERVATIONS ABOUT THIS GROUP OF ISSUES?**

464 A. These issues focus on the point (or points) of interconnection ("POI") between the
465 networks of SBC Illinois and MCI. One would think that this would not be much of an

466 issue for the parties since they have interconnected their networks in Illinois since at least
467 1997, and SBC Illinois' proposals simply seek to preserve the current form of
468 interconnection. MCI, on the other hand, seeks language that would permit it to modify
469 the existing interconnection arrangements in a way that would increase the risk of tandem
470 exhaust, make the network more susceptible to failure and unnecessarily increase SBC
471 Illinois' costs.

472

473 **Q. DOES SBC ILLINOIS AGREE THAT A REQUESTING CARRIER IS**
474 **ENTITLED TO A SINGLE POI?**

475 A. Yes. SBC Illinois agrees that, in an effort to foster competition, requesting carriers
476 should be allowed to establish at a minimum, one point of interconnection in a LATA
477 within the franchise territory of the ILEC in which the requesting carrier seeks to
478 compete.

479

480 **Q. ARE MULTIPLE POIs BETWEEN SBC ILLINOIS AND MCI NECESSARY?**

481 A. Yes. In order to avoid network and/or tandem exhaust situations, it is reasonable that a
482 process exist for requesting interconnection at additional, technically feasible points.
483 Moreover, it is appropriate for the Parties to negotiate the establishment of additional
484 POIs within an area where call traffic levels may lead to inefficient network utilization or
485 the exhaustion of network facilities. Multiple POI(s) balance the facilities investment and
486 provide the best technical implementation of interconnection requirements. Both Parties
487 should negotiate the architecture in each location that will seek to mutually minimize and

488 equalize investment.⁹ In fact, MCI has proposed language that recognizes that the
489 principle of investment equalization is an important one: “The overall goal of POI
490 selection will be to achieve a balance in the provision of facilities that is fair to both
491 Parties.”¹⁰ The language proposed by SBC Illinois provides MCI with a variety of
492 options for establishing a single POI and adding additional POIs as MCI’s customer
493 growth dictates.

494

495 **Q. WHY DO YOU SAY THAT A SINGLE POI IS APPROPRIATE IN SOME**
496 **CASES, BUT NOT OTHERS?**

497 A. That was essentially the view of the Texas Commission in an MCI arbitration proceeding
498 in 2000. There, the Texas Commission held that “While the establishment of a single POI
499 may be efficient during initial market entry, once growth accelerates, what was initially
500 economically efficient may become extremely burdensome for one party. Although the
501 FCC’s First Report and Order expressly provides for interconnection at any technically
502 feasible point, it does not state that only one POI is required.”¹¹

503

504 **Q. SHOULD THE AGREEMENT PERMIT MCI TO TRANSFORM THE CURRENT**
505 **MULTI-POI INTERCONNECTION ARRANGEMENT INTO ONE WITH ONLY**
506 **A SINGLE POI?**

⁹ *Id.*

¹⁰ DPL NIM Issue 14 - MCI proposed language at 3.1

¹¹ Texas Docket No. 21791, MCIW Arbitration Award at 12 (May 23, 2000)

507 A. No. The parties have invested time and expense to interconnect their networks at
508 multiple points within the Chicago LATA. There is, in fact, already an existing POI at
509 each SBC Illinois tandem in the Chicago LATA. These existing POIs demonstrate that
510 MCI itself has recognized that it is most efficient for the parties to interconnect at
511 multiple locations throughout the LATA. The language proposed by MCI, however,
512 would permit MCI to tear down these existing POIs and to leave in place a single POI.
513 This is simply not good network engineering.

514

515 **Q. WHY?**

516 A. By selecting a single point of interconnection MCI is putting the reliability of both
517 networks in a vulnerable position. Though SBC Illinois agrees that a single POI may
518 help a carrier establish a foothold in a given LATA, as growth accelerates, multiple POIs
519 provide the diversity, security and reliability that a single POI cannot.

520

521 With a single POI arrangement, a catastrophic failure at that single POI location, such as
522 a fire, could completely isolate that carrier's network from the Public Switched
523 Telephone Network ("PSTN"). While the PSTN contains many built-in redundancies to
524 protect itself from such catastrophic events, the PSTN cannot guarantee protection from a
525 single point of failure to a carrier that chooses to place all of its access to the PSTN
526 through a single POI.

527

528 In addition, problems in one carrier's network can create a backlash into other carrier's
529 networks, causing blocked calls. Blocked calls have an exponential effect due to
530 customer attempts to redial the telephone number. Any long range planning of a
531 telecommunications carrier's network should include redundant protections on behalf of
532 that carrier's end users as well as the general public's safety. The successful completion
533 of calls, including 911 emergency calls, for any carrier's end users demands nothing less.

534

535 In these days of heightened sensitivity to national security and network reliability it is
536 difficult to understand why any carrier would risk its network reliability by choosing to
537 access the PSTN at a single POI on a long term basis. Even more difficult to understand
538 is MCI's position that it should be allowed to decommission existing POIs and revert its
539 network back to a single POI arrangement.¹²

540

541 **Q. DOES MCI'S PROPOSAL CREATE THE RISK THAT SBC ILLINOIS COULD**
542 **BE FORCED TO ESTABLISH A POI OUTSIDE ITS SERVING TERRITORY?**

543 A. Yes. MCI's proposed language on issue 14 states "MCI may, at its discretion, establish a
544 single POI."¹³ MCI's language omits any reference to "within" the incumbent LEC's
545 network, which is a critical component of the interconnection requirements under Section

¹² NIM DPL – Issue 14 – MCI proposed language at 3.3 – “The Parties agree that MCI may, at its discretion, continue, to maintain these additional POIs... but shall be under no obligation to do so and may decide to maintain only a single POI per LATA.”

¹³ DPL NIM Issue 14 – MCI proposed language at 3.3 – “MCI may, at its discretion, establish a single POI in each LATA in which it originates local, intraLATA toll or meet point switched access traffic.”

546 251(c)(2). Under the Act, of course, the technically feasible point must be within the
547 ILEC's network.

548

549 **VI. MUTUAL AGREEMENT**

550 **NIM 16** - When is mutual agreement necessary for establishing the requested method of
551 interconnection?

552

553 **NIM 18 b** - Should the Fiber Meet Design option selected be mutually agreeable to both
554 Parties?

555

556 **Q. WHAT IS THE UNDERLYING DISPUTE IN DPL NIM ISSUE 16?**

557 A. Proposed language in Issue 16 addresses Fiber Meet arrangements. Fiber Meet involves
558 facilities provided by both Parties between MCI's network and SBC Illinois' network.
559 SBC Illinois is willing to agree to such Fiber Meet arrangements where SBC Illinois has
560 existing fiber. SBC Illinois is also willing to agree to interconnection methods identified
561 in Appendix NIM or other mutually agreed upon methods that are beneficial to both
562 Parties and that do not inappropriately shift MCI's responsibilities to SBC Illinois, but
563 they should not be dictated by MCI, especially when they cause SBC Illinois to incur
564 substantial expense.

565

566 The language proposed by SBC Illinois in sections 2.2, 4.4.1, 4.4.4.3 and 4.5.1 allows for
567 mutual agreement for interconnection arrangements beneficial to both Parties. The
568 alternative (i.e., that a CLEC can unilaterally select the fiber meet arrangement without

569 input from and consent of SBC Illinois) would lead to POI decisions that shift MCI's
570 responsibility for its interconnection facilities to SBC Illinois.

571

572 **Q. HOW WOULD SBC ILLINOIS BE IMPACTED IF MUTUAL AGREEMENT**
573 **FOR FIBER MEET ARRANGEMENTS IS NOT ALLOWED?**

574 A. Fiber deployment can be expensive. Where fiber facilities do not exist, SBC Illinois may
575 be willing to deploy fiber to MCI for Fiber Meet on a limited basis. However, the
576 language proposed by MCI would allow MCI to demand Fiber Meet on an unlimited
577 basis with no consideration of the unnecessary expenses SBC Illinois would incur. SBC
578 Illinois should have some say in how it must deploy new fiber facilities dedicated
579 exclusively to interconnection with MCI. As I point out in connection with NIM Issue
580 28, MCI underutilizes its existing trunks, so requiring SBC Illinois to establish new Fiber
581 Meets at MCI's sole request is not reasonable or necessary.

582

583 **Q. SHOULD FIBER MEET ARRANGEMENTS AS IDENTIFIED IN NIM ISSUE 18**
584 **BE MUTUALLY AGREED TO BY THE PARTIES?**

585 A. Yes. The issue here is the same as for NIM 16. Where fibers exist to an MCI premises,
586 SBC Illinois is willing to establish a Fiber Meet Arrangement based on mutual
587 agreement. Design Option Two in section 4.4.4.3.2 – which MCI opposes - reasonably
588 governs those situations where SBC Illinois does not have fiber facilities to an MCI
589 location and MCI still wants to establish a Fiber Meet.

590

591 **Q. WOULD MUTUAL AGREEMENT ON THE INTERFACE AS PROPOSED BY**

592 **SBC ILLINOIS IMPAIR MCI'S ABILITY TO INTERCONNECT?**

593 A. No. In fact, MCI stated that Fiber Meet is preferred except where it is not agreed upon
594 and that mutual agreement is acceptable where the interface has not been identified.¹⁴
595 MCI's own language recognizes mutual agreement for interface requirements, including
596 Fiber Meet.

597

598 **Q. HOW SHOULD THE COMMISSION RULE FOR NIM ISSUES 16 AND 18?**

599 A. The Commission should find that mutual agreement for Fiber Meets does not impair
600 MCI's ability to select the method of interconnection, but merely provides SBC Illinois
601 the ability to provide input on the establishment of jointly provisioned facilities.

602

603 **VII. FACILITY REQUIREMENTS**

604 **NIM Issue 13** - Should MCI be solely responsible for the facilities that carry OS/DA,
605 911, mass calling and Meet-Point trunk groups?

606

607 **NIM Issue 17** – Should the facilities used for 251(c)(2) interconnection be priced at
608 TELRIC rates?

609

610 **Q. PLEASE DESCRIBE THE DISPUTE ON ISSUE 13.**

611 A. MCI proposes that the facilities for these trunk groups be treated no differently than
612 interconnection trunk groups for purposes of determining which party is responsible to
613 provide them, and where the point of interconnection shall be. SBC Illinois proposes in

614 section 2.5 that MCI be solely responsible for these facilities since they exclusively
615 serve MCI's customers.

616

617 **Q. PLEASE DESCRIBE THE SERVICES THAT ARE PROVISIONED AND**
618 **TRANSPORTED OVER THESE FACILITIES IN MORE DETAIL.**

619 A. The following are ancillary services that are provisioned and transported over facilities
620 specifically designed to serve only MCI's end users:

- 621 ? Operator Services and Directory Assistance is provided by MCI strictly for the
622 benefit of its end users.
623 ? MCI is legally obligated to provide 911 capabilities for its own end users and is
624 covered more in detail by Mr. Novack.
625 ? Mass Calling trunks ensure network reliability and 911 capability. Mass Calling
626 events such as radio contests or American Idol voting can jeopardize network security
627 and reliability.
628 ? Meet-point trunk groups and facilities are strictly for origination and termination of
629 IXC delivered long distance traffic between MCI's end users and the specific IXC
630 that the MCI end user has selected.
631

632 **Q. WHY SHOULD MCI BE RESPONSIBLE FOR THE FACILITIES USED TO**
633 **CARRY ITS OS/DA, 911, MASS-CALLING AND MEET-POINT TRUNK**
634 **GROUPS?**

635 A. OS/DA, 911, Mass-calling and Meet-point trunk groups are provided by MCI in support
636 of the telecommunications services it provides to its end users. Interconnection between
637 MCI and SBC Illinois is for the mutual exchange of Section 251(b)(5) traffic between
638 MCI's end users and SBC Illinois' end users. The services provided through OS/DA,

¹⁴ DPL – NIM Issue 16 – MCI proposed language at 4.4.1 – “Fiber Meet is the target architecture, except in scenarios where it is not feasible or agreed upon.” “The Parties may mutually agree to other design

639 911, mass-calling and meet-point trunk groups neither originate nor terminate to SBC
640 Illinois end users and, therefore, do not qualify as Section 251(b)(5) traffic. MCI should
641 be solely responsible for the trunks and underlying facilities necessary to provide such
642 services to MCI's end users. MCI should not be allowed to shift its costs to SBC Illinois
643 or to force SBC Illinois end users to subsidize these services on behalf of MCI's end
644 users.

645

646 **Q. WHAT IS THE DISPUTE REGARDING ISSUE 17?**

647 A. MCI believes that it is entitled to TELRIC pricing for interconnection facilities on its side
648 of the POI.¹⁵ This is another example of MCI confusing trunks and facilities. Under the
649 FCC's definition from the TRO, interconnection facilities are no longer a part of SBC
650 Illinois' network subject to unbundling at TELRIC pricing.

651

652 **Q. HOW DOES THE TRO DISTINCTLY IMPACT INTERCONNECTION?**

653 A. In two ways. First, the FCC, in the TRO, clarified the definition of the elements that
654 constitute the incumbent LEC's network.

655 The FCC narrowed the definition of unbundled dedicated transport ("UDT") to
656 transmission facilities connecting incumbent LEC switches and wire centers
657 within a LATA and expressly rejected their prior definition of UDT.

658 "We find that a more reasonable and narrowly-tailored definition of the dedicated
659 transport network element includes only those transmission facilities within an

options."

¹⁵ See Ricca Direct at page 39, lines 935 – 939 – "TELRIC pricing should be used when trunks are leased by one Party from the other for interconnection."

660 incumbent LEC's transport network, that is, the transmission facilities between
661 incumbent LEC switches."¹⁶

662 "We find that transmission facilities connecting incumbent LEC switches and
663 wire centers are an inherent part of the incumbent LEC's local network Congress
664 intended to make available to competitors under section 251(c)(3). On the other
665 hand, *we find that transmission links that simply connect a competing carrier's*
666 *network to the incumbent LEC's network are not inherently a part of the*
667 *incumbent LEC's local network. Rather, they are transmission facilities that*
668 *exist outside the incumbent LEC's local network.*"¹⁷ (Emphasis added.)

669 In defining the ILEC's network to be only those transmission facilities between ILEC
670 switches and wire centers and clarifying that transmission facilities connecting a
671 competing carrier's network to the ILEC's network exist outside of the ILEC's network,
672 the FCC recognized that its previous definition of dedicated transport was misguided¹⁸
673 and may have inappropriately shifted the CLECs' network deployment costs and
674 responsibilities to the ILECs.¹⁹ Under the old rules, CLECs were more inclined to "rely
675 exclusively on the incumbent LEC's network."²⁰

676
677 Second, the TRO places the responsibility on the CLEC for the facilities outside the
678 ILEC's network necessary for interconnection. That is, the entrance facilities, those
679 facilities used to link the requesting carrier's network with the incumbent LEC's network

¹⁶ TRO at ¶ 366

¹⁷ *Id.*

¹⁸ *Id.* – "... because unbundling this type of transmission facility is "technically feasible" and "will reduce entry barriers into the local exchange market," it was appropriate to include such facilities within the definition of dedicated transport. We find that this approach was misguided."

¹⁹ *Id.* at ¶ 367

²⁰ TRO ¶ 367 – Moreover, we find that our more limited definition of transport is consistent with the Act because it encourages competing carriers to incorporate those costs within their control into their network deployment strategies rather than to rely exclusively on the incumbent LEC's network.

680 that “exist outside the incumbent LEC’s local network” are the responsibility of the
681 requesting carrier.

682 “On the other hand, we find that transmission links that simply connect a
683 competing carrier’s network to the incumbent LEC’s network are not inherently a
684 part of the incumbent LEC’s local network. Rather, they are transmission
685 facilities that exist outside the incumbent LEC’s local network.”²¹

686 “Our conclusion in this respect is buttressed by the fact that economics of
687 dedicated facilities used for backhaul between networks are sufficiently different
688 from transport within an incumbent LEC’s network that our analysis must
689 adequately reflect this distinction.”²²

690 “Competing carriers have control over where to locate their network facilities to
691 minimize self-deployment costs, or the costs of using third-party alternatives for
692 transport from the incumbent LEC’s network. These backhaul facilities from
693 incumbent LEC networks to competitor’s networks are distinguished from other
694 transport facilities because competing carriers have some control over the location
695 of their network facilities... Competing carriers control, in part, how they design
696 and locate their networks, as opposed to obtaining a connection between two
697 incumbent LEC wire centers. For instance, a competing carrier can choose to
698 locate its switch very close to an incumbent LEC wire center to minimize costs
699 associated with deploying fiber over longer distances. Similarly, a competing
700 carrier can choose to locate its network equipment, such as its switch, near other
701 competing carriers to share costs, or near existing competitive fiber providers that
702 have already deployed competitive transport facilities... Moreover, *we find that*
703 *our more limited definition of transport is consistent with the Act because it*
704 *encourages competing carriers to incorporate those costs within their control*
705 *into their network deployment strategies rather than to rely exclusively on the*
706 *incumbent LEC’s network.*”²³

707
708 The FCC, in the TRO, ruled that competing carriers must incorporate those costs to
709 interconnect into their own network deployment strategies, not shift those costs to the
710 ILEC, or to “rely exclusively on the incumbent LEC’s network.” Consequently, SBC

²¹ *Id.* - ¶ 366

²² *Id.* - ¶ 367

²³ *Id.* - ¶ 367

711 Illinois is not obligated to provide MCI with facilities as unbundled dedicated transport or
712 at TELRIC and is not required to provide unbundled network elements outside of SBC
713 Illinois' local network.

714

715 **Q. HOW DOES THIS RELATE TO THE INTERCONNECTION OBLIGATION**
716 **UNDER 251(C)(2)?**

717 A. Section 251(c)(2) of the Act states that incumbent LECs must provide for interconnection
718 at any technically feasible point within the ILEC's network. This was defined by the
719 FCC in the First Report and Order:

720 "The Commission concludes that the term "interconnection" under section
721 251(c)(2) refers only to the physical linking of two networks for the mutual
722 exchange of traffic."²⁴

723 The TRO further defined the ILEC's dedicated transport network to be only those
724 transmission facilities between incumbent LEC switches²⁵ and places the responsibility
725 on the requesting carrier for the facilities outside the ILEC's network necessary for
726 interconnection.

727

728 **Q. DOES THE TRO ELIMINATE SBC ILLINOIS' OBLIGATIONS TO PROVIDE**
729 **FOR INTERCONNECTION?**

730 A. No. In fact, the FCC reiterated that:

²⁴ First Report and Order – ¶ 3

²⁵ TRO - ¶ 366

731 “In reaching this determination we note that, to the extent that requesting carriers
732 need facilities in order to “interconnect[] with the [incumbent LEC’s] network,
733 section 251(c)(2) of the Act expressly provides for this and we do not alter the
734 Commission’s interpretation of this obligation.”²⁶

735 In other words, SBC Illinois must still abide by Section 251(c)(2) of the Act and must
736 provide interconnection to requesting carriers at any technically feasible point within its
737 network. The FCC’s decisions and rulings in the TRO have just more clearly defined the
738 ILEC network to be “only those transmission facilities within an incumbent LEC’s
739 transport network, that is, the transmission facilities between incumbent LEC switches”²⁷
740 and MCI is responsible for its entrance facilities, because those “transmission links that
741 simply connect a competing carrier’s network to the incumbent LEC’s network are not
742 inherently a part of the incumbent LEC’s local exchange network”.²⁸

743

744 **VIII. OPERATIONAL ISSUES**

745 **NIM 28** - For trunk blocking and/or utilization, what is the appropriate methodology for
746 measuring trunk traffic?
747

748 **Q. WHAT ISSUE IS RAISED BY NIM 28?**

749 A. The disputed language in section 17.1 and 18.7 raises the question of how best to match
750 the number of trunks connecting two switches to the volume of traffic passing between
751 those two switches. SBC Illinois has an established method for making that
752 determination – a method that it applies when the question concerns only its own traffic.
753 SBC Illinois’ method works well, for both SBC Illinois and CLECs, and there is no

²⁶ TRO - ¶ 366

²⁷ *Id.*

754 reason to require SBC Illinois to adopt a different method for MCI. MCI, however – with
755 both of the contract provisions cited above – is proposing language which could increase
756 the number of trunks that would be required between the parties’ switches. MCI’s
757 proposed changes could be expensive and would yield no discernible benefit to either
758 company’s end users.

759

760 **Q. WHAT IS MCI’S POSITION?**

761 A. Mr. Price states in his direct testimony that SBC Illinois does not use Erlang and instead
762 uses the Neal Wilkinson tables.²⁹ This is not accurate, because SBC Illinois does use
763 Erlang for high usage trunk groups, which are trunk groups engineered to overflow to
764 another trunk group. SBC Illinois’ experience is, however, that the Neal Wilkinson
765 tables provide for a higher grade of service for final trunk groups.

766

767 Another disputed issue is whether a five day average or a 20 day busy hour should be
768 used to measure utilization. With a base of 20 days of busy hour measurements on a
769 typical trunk group, there is a 95 percent assurance that the difference between the
770 statistically estimated load and the observed load will not exceed the range of plus or
771 minus 5 percent for larger trunk groups (25 trunks or more) and 11 percent plus or minus
772 for smaller groups. With only 5 days of data, the 95 percent confidence interval is in the
773 order of plus or minus 10 and 22 percent, respectively. There is always an error rate in

²⁸ *Id.*

²⁹ See Price Direct at page 93, lines 2498 - 2513

774 any statistical calculation and 20 days has a lower threshold of error, therefore is the
775 preferred method.

776
777 Mr. Price is apparently concerned that SBC Illinois' proposal could lead to insufficient
778 trunks between our networks,³⁰ but he cites no facts to support this argument. In fact,
779 recent trunk data for the three MCI operating companies in Illinois reveals that there are
780 many underutilized trunk groups.³¹ For the week of July 26, 2004, Intermedia required
781 an average of *** ***, WorldCom an average of *** *** and MCI an average
782 of *** *** of the trunks each had in service. Considering this extreme
783 underutilization of MCI's trunk groups, any concern that SBC Illinois is going to
784 downsize the trunk groups without any coordination whatsoever is drastically overstated.

785

786 **Q. IN GENERAL, HOW DOES A CARRIER DETERMINE HOW MANY TRUNKS**
787 **THERE SHOULD BE BETWEEN ANY TWO SWITCHES?**

788 A. Between each pair of connected switches, there is some finite number of trunks, and the
789 optimal number of trunks between any two switches is a function of the volume of traffic
790 between those two switches. Network engineers seek to ensure that the number is
791 appropriate for each pair of switches – in other words, that there are enough trunks to
792 carry the traffic between those switches without an unacceptable percentage of calls
793 being blocked, but without having an uneconomically excessive number of trunks.

³⁰ Id. at page 93, lines 2482-2484 – “MCI has serious concerns that using SBC’s proposed methods would negatively impact its customers (present and future) by leading to significant blockage of calls.”

794

795 **Q. WHAT DO YOU MEAN BY AN “UNACCEPTABLE PERCENTAGE OF CALLS**
796 **BEING BLOCKED,” AND AN “UNECONOMICALLY EXCESSIVE NUMBER**
797 **OF TRUNKS”?**

798 A. As with MCI’s trunk groups as shown above, a carrier could virtually guarantee that a
799 trunk would always be available between two switches by putting a sufficiently large
800 number of trunks between those switches. For example, if the greatest expected volume
801 of traffic between switch A and switch B at any one time is 1,000 calls, a carrier could
802 put 2,500 trunks between A and B and be just about certain that a trunk would always be
803 available. The problem with such an approach, of course, is that it would be grossly
804 inefficient and costly, because about 1500 of the trunks would never be used. So instead,
805 the network is designed so that there is almost always an available trunk between two
806 given switches, which means that at the busiest times, a tolerably low percentage of calls
807 will be blocked, i.e., will not have an available trunk.

808

809 In fact, SBC Illinois and MCI have agreed that no more than 1% blockage during the
810 busiest hour is acceptable.³²

811

812 **Q. HOW DOES SBC ILLINOIS CALCULATE NUMBER OF TRUNKS NEEDED**
813 **BETWEEN ANY TWO SWITCHES?**

³² See 17.1 – Table 1 – Design Blocking Objective

814 A. In order to determine how many trunks it will take to serve the traffic between two
815 switches, SBC Illinois (and everyone else who undertakes such a task) makes
816 assumptions about the patterns of that traffic. The volume of traffic is the result of
817 several variables, all interacting in a random way. Telephone traffic patterns are
818 determined by seasonality, holidays, weather, TV programming, and other factors. In
819 light of economic considerations of the sort I just mentioned, it is not possible to have a
820 call path available for every call if all subscribers wish to use their phone at the same
821 time. Instead, traffic is measured and assumptions are made based on historical
822 experience.

823
824 The calculations SBC Illinois makes to ensure that an excellent grade of service is offered
825 to its customers is based on a time consistent busy hour. The busiest hour of the day for
826 each trunk group (e.g. 3:00 to 4:00 in the afternoon, or 8:00 to 9:00 in the evening) is
827 studied for 20 days. Based on the average traffic load and information provided in
828 standard industry-wide traffic tables, SBC Illinois calculates the number of trunks
829 necessary.

830
831 On the basis of the foregoing, SBC Illinois has proposed language in Section 17.1 that
832 “Trunk requirements shall be based upon time consistent average busy season busy hour
833 twenty (20) day averaged loads.”

834
835 **Q. IS IT TRUE, AS MR. PRICE ASSERTS, THAT SBC ILLINOIS’ “AVERAGE”**
836 **LANGUAGE WOULD RESULT IN CALL FAILURES “HALF OF THE TIME”**

837 **AS SHOWN IN HIS EXAMPLE?**³³

838 A. No. In fact, Mr. Price's example is irrelevant to trunk utilization. In his example, Mr.
839 Price uses a group of numbers, 1, 2, 3, 4, 5, 2, 3, 4, 5, 10, but fails to explain what these
840 numbers represent (e.g., trunks, calls, calls consuming the entire busy hour in question,
841 etc.). He then calculates an average of 3.9, again failing to explain what the number 3.9
842 represents. This is a baseless statistical model that would have no more value than
843 someone saying "I wrote this many checks, so I must be overdrawn." Without knowing
844 how much each check was written for, how much money was in that person's checking
845 account, and whether the bank was authorized to transfer money from that person's
846 savings account to cover any overages or whether all of the checks have been posted --
847 the number of checks written proves nothing.

848

849 **Q. THE METHOD YOU HAVE DESCRIBED BASES TRUNK REQUIREMENTS**
850 **ON RECENT HISTORY. HOW IS GROWTH ACCOMMODATED?**

851 A. Growth is handled in two ways. First, SBC Illinois accepts orders that match MCI's
852 forecasts. In other words, if MCI knows that its customers will be generating increased
853 call volume, for example because MCI has sold its services to new customers, MCI can
854 place an order with SBC Illinois to increase trunk group sizes, and SBC Illinois will
855 accept MCI's order.

856

³³ See Price Direct at page 95, lines 2529-2540

857 Second, SBC Illinois proposes to increase trunk groups as trunks are 75% utilized. When
858 a trunk group handles 3/4 of the traffic it is designed to handle, SBC Illinois orders
859 additional trunks or advises MCI to do so. The idea is that every trunk group can
860 accommodate the volume of traffic it is handling today plus an additional 1/3. Given that
861 MCI's forecasts are honored, and only 75% utilization is required, MCI will have its
862 growth fully accommodated by SBC Illinois' methodology.

863

864 **Q. GIVEN THAT MCI MAY FORECAST AND ORDER TRUNKS HOWEVER IT**
865 **SEES FIT, WHAT ASSURANCE IS THERE THAT THE NUMBER OF TRUNKS**
866 **WILL NOT BECOME EXCESSIVE?**

867 A. Agreed to language in the contract provides that after a period of 3 consecutive months, if
868 MCI's trunks are not being utilized at 75% or higher levels, trunks will be removed to the
869 point that enough are left for current demand, plus 1/3 more.³⁴ SBC Illinois believes that
870 three months is an adequate period of time to make that determination. After trunks have
871 been utilized at less than 75% capacity for three months, trunks should be removed. As
872 shown earlier, there is compelling evidence that MCI's trunks are underutilized and SBC
873 Illinois has a legitimate concern, both for its own network trunking requirements as well
874 as the trunking requirements of other carriers. Underutilized trunks tie up trunk port
875 equipment making them unavailable for other carriers who may have legitimate trunking

³⁴ NIM ITR – 18.7 Under Utilization – In an under utilization situation (where more capacity exists than actual usage requires) the Parties agree that if a trunk group is under 75 percent (75%) of CCS Capacity... for each month of any three (3) consecutive months period, either Party may request the issuance of an order to resize the trunk group, which must be left with not less than twenty-five percent (25%) excess capacity.

876 requirements. For this reason, underutilization has far reaching implications beyond MCI
877 and SBC Illinois.

878

879 **Q. HOW DOES MCI PROPOSE TRUNK DEMAND SHOULD BE CALCULATED?**

880 A. MCI proposes two changes from what I have described. First, MCI proposes a “weekly
881 peak busy hour average” instead of the “time consistent average busy season busy hour
882 twenty (20) day averaged loads” proposed by SBC Illinois. According to MCI, a weekly
883 average is preferential to a 20-day busy hour average; I disagree. The 20 day average
884 proposed by SBC Illinois is in fact a monthly average because it removes weekend data
885 from the average. Viewing data compiled over longer periods of time will compensate
886 for fluctuations caused by one-time events such as storms. In any statistical model, the
887 larger the sample, the higher the accuracy.

888

889 Because SBC Illinois and MCI have agreed to a three month time period for determining
890 adequate utilization, it makes more sense to review data on a month to month basis rather
891 than a more volatile and fluctuating weekly basis.

892

893 In addition, MCI criticizes the “averaging” aspect of SBC Illinois’ proposal, but this is
894 completely appropriate because it accounts for anomalies and fluctuations that would
895 otherwise skew the results. It would be no different than observing one pitch of a
896 baseball game and then deciding the appropriate strategy for winning the game.

897

898 **Q. SHOULD THE COMMISSION RULE IN FAVOR OF SBC ILLINOIS’**
899 **LANGUAGE REGARDING TRUNK UTILIZATION?**

900 A. Yes. For all of the reasons stated above, the Commission should adopt SBC Illinois’
901 proposed language on this issue. The Neal Wilkinson tables should continue to be used
902 for final trunk groups and the Erlang for high usage trunk groups that overflow to a final
903 trunk group.

904

905 **IX. TRANSIT SERVICE**

906 **NIM 31** - Should a non-section 251/252 service such as Transit Service be arbitrated in
907 this section 251/252 proceeding?
908

909 **Q. WHAT IS THE DISPUTE ON NIM 31?**

910 A. MCI proposes to insert language in section 22 to govern transit traffic. This is not
911 appropriate because this is traffic between MCI and other carriers – not traffic that
912 originates or terminates on SBC Illinois’ network. Accordingly, it does not come within
913 any obligation under Section 251/252 and should not be included in the Agreement.

914

915 **Q. WHY DO YOU SAY THAT TRANSIT TRAFFIC IS NOT A SECTION 251/252**
916 **OBLIGATION?**

917 A. This is a question for the lawyers in the briefs, but my layman’s understanding is that
918 Section 251(a)(1) of the Act requires all carriers to interconnect either directly or
919 indirectly with the network of other telecommunications carriers. A plain reading of

920 Section 251(a)(1) places no obligation on the incumbent LECs or any other carrier to
921 provide transiting service on behalf of another carrier seeking indirect interconnection.

922 If this were the intention of Congress in writing Section 251(a)(1), then Section 251(c)(2)
923 would have included such an obligation on the ILECs, as is evident by the inclusion of 4
924 conditions (A-D) under Section 251(c)(2). Congress would have added a fifth condition
925 (E) to require ILECs to provide indirect interconnection.

926
927 Therefore, Section 251(a)(1) can only be read to place “the duty to interconnect directly
928 or indirectly” squarely on MCI. MCI can seek indirect interconnection with SBC Illinois
929 (or another carrier) provided it can find a carrier willing to provide the transiting service
930 necessary for such indirect interconnection. However, imposing transiting obligations on
931 another carrier would, in effect, shift MCI’s obligations to interconnect onto the transit
932 provider.

933
934 **Q. ARE THERE OTHER CARRIERS BESIDES SBC ILLINOIS THAT A CARRIER**
935 **SEEKING INDIRECT INTERCONNECTION CAN USE?**

936 A. There are any number of carriers that offer transport and transiting. A number of carriers,
937 including AT&T and MCI, have indicated an interest in providing transit services to other
938 carriers.

939
940 **Q. IS SBC ILLINOIS REFUSING TO CONSIDER OR PROVIDE A TRANSIT**

941 **SERVICE AS IMPLIED BY MR. RICCA IN HIS TESTIMONY?**³⁵

942 A. No. SBC Illinois does not seek to cease providing the transit function. To the contrary,
943 we will continue to transit traffic originated by MCI. Our position is that we should be
944 permitted to do so pursuant to an agreement other than an ICA.

945

946 **X. FX TRAFFIC**

947 **NIM 22** - Should each party be required to bear the cost of transporting FX traffic for
948 their end users?
949

950 **Q. ARE THERE SPECIAL CALLS FOR WHICH IT IS PARTICULARLY**
951 **APPROPRIATE THAT MCI BEAR THE EXPENSE OF TRANSPORTING**
952 **OUTSIDE A LOCAL CALLING AREA?**

953 A. Yes. Calls that are dialed as local calls but that are delivered outside the local calling
954 area are “foreign exchange” or “FX” calls. This is the issue raised in Interconnection
955 Issue 22 and in section 9.5. In a nutshell, in the case of FX calls, SBC Illinois bears the
956 entire expense of long transport facilities *without the ability to charge either its own*
957 *customer or MCI for the service.* This unique calling arrangement falls well outside the
958 “calling party pays” model because the company originating the call (SBC Illinois)
959 cannot charge its own customer for calls that connect them with MCI customers, which is
960 effectively a long distance call.

961

³⁵ See Ricca Direct – page 39, line 948 – “The heart of the dispute is SBC’s refusal to consider as part of this agreement provisions relating to what is referred to in the industry as “transit traffic.”

962 **Q. WHAT IS FX AND HOW IS IT TRANSPORTED?**

963 A. FX “foreign exchange” is a service offered to an end user that resides in one local
964 exchange area, but wishes to have local calling from/to end users in another local
965 exchange area. With FX service, the requesting end user pays its LEC for the call to be
966 transported to the “foreign exchange” so that end users are not billed toll for placing
967 those calls. The FX customer’s service (including its dial tone) is physically wired to
968 another exchange, which may be toll to the exchange where the service is “wired” to, but
969 local to/from the office where it is wired from. In essence, the FX end user is paying for
970 the long distance charges on behalf of others wishing to call them by paying to extend the
971 “loop” from one local exchange area to another local exchange area.

972

973 **Q. SHOULD EACH PARTY BE REQUIRED TO BEAR THE COST OF**
974 **TRANSPORTING FX TRAFFIC FOR THEIR END USERS?**

975 A. Yes. FX service allows an end user to order a telephone line in one local calling area that
976 brings in a dial-tone line from another calling area, i.e. a Chicago business with a New
977 York FX line will have dial-tone brought in from New York and when calls are made
978 from that line, they are from a “New York” local calling perspective. The cost of this
979 service is passed on to the “FX” end user, therefore, each party should bear the cost of
980 providing this service to their own “FX” end users.

981 **Q. WHAT IS MCI PROPOSING FOR ITS FX TRAFFIC?**

982 A. MCI would offer an FX service to its end users, most likely ISPs, but have SBC Illinois
983 provide the transport.³⁶ If MCI wants to provide an FX service to its end users, SBC
984 Illinois does not care. However, MCI should bear the costs of delivery for those calls.
985 Transport associated with the extended “loop” is for the benefit of MCI’s end user, not
986 SBC Illinois.

987

988 **Q. CAN YOU EXPLAIN IN A BIT MORE DETAIL?**

989 A. Yes. Picture if you will a service offered by carriers that permits a restaurant in
990 downtown Chicago to establish a local number in a suburban area so that customers in
991 that suburban area can call without incurring any toll charges. This permits an SBC
992 Illinois customer in Geneva, Illinois, to dial an MCI telephone number assigned to
993 Geneva as a local call. MCI’s end user, however, is a restaurant in Chicago. The
994 restaurant has been assigned an FX number for the sole purpose of receiving calls from
995 Geneva on a toll free basis.

996

997 **Q. DOES SBC ILLINOIS SEEK TO CHARGE A GENEVA CUSTOMER LONG**
998 **DISTANCE, WHEN HE HAS DIALED A GENEVA TELEPHONE NUMBER?**

999 A. No. SBC Illinois agrees with MCI and previous ICC rulings that a Geneva customer
1000 dialing a Geneva telephone number should not pay to place the call.

³⁶ DPL NIM Issue 22 – MCI position statement – “SBC’s attempts to dictate MCI’s network architecture under any circumstance should be firmly rejected by the Commission. SBC cannot be allowed to impose arbitrary costs on CLECs. Without the language proposed by SBC, MCI will still be responsible for the carriage of any FX traffic to its end-user customers *from its side of the POI*. That is all the Act requires or permits.”

1001 **Q. HOW DO ROUTING AND RATING OPERATE BETWEEN NETWORKS?**

1002 A. Carriers rely on each other to publish information about telephone numbers as they
1003 activate them for dialing. When a carrier publishes a new prefix in the Local Exchange
1004 Routing Guide (“LERG”), it publishes the code with a “rate center” designation and a
1005 switch destination. A rate center tells all carriers where to consider the code’s geographic
1006 location to be, and how to treat it for billing (i.e., local versus toll) purposes. The switch
1007 destination tells all networks where to physically route calls that have been dialed with
1008 that prefix.

1009

1010 This is a normal local calling arrangement when MCI is directing a call to an end user
1011 who is located in Geneva. When MCI directs the Geneva number to an MCI end user
1012 located in Chicago, however, it is a toll call (35 miles long), from a Geneva customer to
1013 the MCI customer, which the Geneva customer dials for free.

1014

1015 From a rating and routing perspective, therefore, the call to the Geneva number for an
1016 end user located in Chicago is a type of mismatch. The end user is dialed as if he were in
1017 Geneva. An end user dialing from Geneva would see “Geneva” listed on his bill as the
1018 destination of his call, yet the end user who is being called is not in Geneva. In effect
1019 rating and routing systems have been tricked.

1020

1021 **Q. HOW DOES TOLL CALLING WORK, BASED ON THE LERG ENTRIES?**

1022 A. The LERG shows two sets of Vertical and Horizontal (V and H) coordinates, the switch
1023 location, and the rate center V and H coordinates. One switch may serve several rate
1024 centers.

1025

1026 **Q. ON A PHYSICAL NETWORK LEVEL, HOW DOES FX SERVICE OPERATE?**

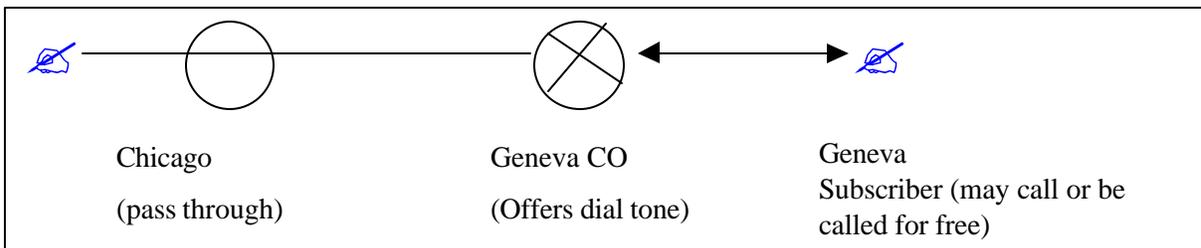
1027 A. There are various ways of making this service work. If SBC Illinois were offering a
1028 Geneva FX service to a company in Chicago, the Chicago customer's line would be
1029 extended through his serving wire center in Chicago, all the way to Geneva, from which
1030 he would draw dial tone and receive telephone calls. SBC Illinois would be offering the
1031 transport for the "toll" portion of the call. A diagram of this service, where a Geneva end
1032 user can call him toll free, would look like this:

1033

1034

1035

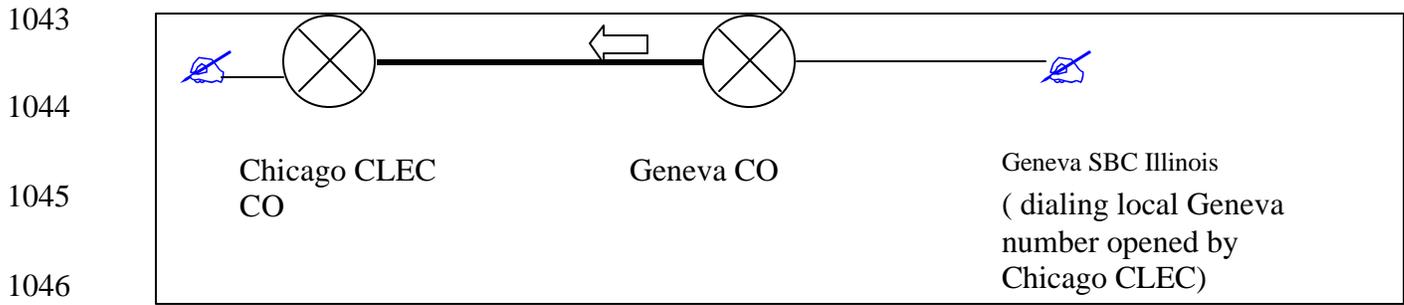
1036



1037

1038 **Q. HOW MIGHT FX SERVICE BE PROVISIONED BY CLECS AND ILECS?**

1039 A. On a physical level, two different facility-based carriers would each be involved in the
1040 provisioning of FX type service. In the diagram below, MCI and its Chicago end user are
1041 on the left, and SBC Illinois and its Geneva end user are on the right. The thick line
1042 between the switches is an interoffice trunk.



1047

1048 The facility which the trunk rides (copper cable, fiber optics) is a long electrical or light
1049 path that spans the distance from the Chicago switch location to the Geneva switch
1050 location. This means that SBC Illinois would bear the expenses of a toll call, but would
1051 not recover that expense by billing MCI *or the end user* for the call.

1052

1053 **Q. WHAT HAS THE ICC PREVIOUSLY SAID ABOUT FX SERVICE?**

1054 A. In the SBC Illinois/Level 3 Arbitration (Docket No. 00-0332), the Commission expressed
1055 its view that FX is a type of long distance service:

1056 Whether designated as “virtual NXX,” which Level 3 uses, or as “FX,” which AI
1057 prefers, this service works a fiction. It allows a caller to believe that he is making
1058 a local call and to be billed accordingly when, in reality, such call is travelling to a
1059 distant point that, absent this device, would make the call a toll call. The virtual
1060 NXX or FX call is local only from the caller’s perspective and not from any other
1061 standpoint. There is no reasonable basis to suggest that calls under this fiction can
1062 or should be considered local for purposes of imposing reciprocal compensation.

1063

1064 **Q. DID THE COMMISSION ADDRESS FX CALLING IN DOCKET 01-0614?**

1065 A. Yes. In that order, the Commission recognized that FX calling merited special treatment
1066 in terms of both interconnection trunking and reciprocal compensation. The Commission

1067 deferred the question of whether SBC Illinois was entitled to charge CLECs for the
1068 additional transport costs associated with FX traffic and directed Staff to consider a
1069 potential rulemaking to address FX traffic:

1070 Our acceptance of Staff's position includes its recommendation that we defer the
1071 issue of compensation for FX or NXX traffic pending the development of a
1072 further record. While Staff did not suggest a particular vehicle for this exercise,
1073 the arguments of the parties here and the regularity with which similar issues have
1074 been and are being addressed by the Commission, suggests that it may be
1075 provident to begin a reciprocal compensation rulemaking to bring finality to these
1076 matters. To that end, Staff is directed to examine the costs and benefits of such an
1077 undertaking and to report its conclusion to the Commission within 90 days of the
1078 entry of this Order.³⁷

1079 SBC Illinois believes that it is appropriate for the Commission to rule that MCI is no
1080 longer entitled to free transport for what is, for all practical purposes, toll traffic.

1081

1082 **Q. WOULD THE COMMISSION'S ADHERENCE TO ITS DECISION IN LEVEL 3**
1083 **IN ANY WAY IMPEDE MCI'S ABILITY TO PROVIDE FX SERVICE OR TO**
1084 **USE ITS NXX AS IT CHOOSES?**

1085 A. No. MCI can still provide FX service wherever and to whomever it likes, provided that it
1086 does not abuse that service to impose unwarranted costs on SBC Illinois. SBC Illinois is
1087 not dictating any other local service provider's network configurations. Rather, it is
1088 simply ensuring that costs of service (in this case the toll-substitute FX service) are
1089 properly allocated to and borne by the carrier and the end user who benefit from that
1090 service.

1091

1092 **Q. WOULD THE COMMISSION'S ADHERENCE TO ITS DECISION IN LEVEL 3**
1093 **AFFECT THE RATE PAID BY END USERS CALLING AN FX SERVICE**
1094 **TELEPHONE NUMBER?**

1095 A. No, there would be absolutely no impact on the rates paid by callers. Those calls would
1096 continue to be billed as local calls to the originating caller based on the rate center
1097 assigned to the NXX code by the provider of the FX service.

1098

1099 **Q. HOW SHOULD THE COMMISSION RESOLVE THIS ISSUE?**

1100 A. It should adopt the language proposed by SBC Illinois for section 9.5.

1101

1102 **XI. OUT OF EXCHANGE TRAFFIC**

1103 **NIM 32** - Should SBC ILLINOIS be required to open NXX codes serving exchanges
1104 outside of SBC ILLINOIS' incumbent territory?

1105

1106 **Q. HOW SHOULD INTERCONNECTION FOR OUT-OF-EXCHANGE LEC**
1107 **TRAFFIC BE HANDLED?**

1108 A. The Out-Of-Exchange LEC ("OE-LEC") Appendix is designed specifically to address
1109 instances when MCI is operating outside of SBC Illinois' incumbent LEC territory and
1110 interconnecting with SBC Illinois pursuant to Section 251(a)(1) of the Act (rather than
1111 pursuant to Section 251(c)). Interconnection pursuant to Section 251(a) is more
1112 appropriately addressed in a separate appendix governing out-of-exchange traffic, which
1113 is precisely what SBC Illinois has offered here. The exchange of traffic in the situations

³⁷ Order, Docket 01-0614, June 11, 2002, ¶336.

1114 covered by the Appendix is not governed by Section 251(b) or (c).

1115

1116 **Q. MR. PRICE CLAIMS THAT SBC ILLINOIS' POSITION WILL PREVENT**
1117 **CALLS BETWEEN SBC ILLINOIS CUSTOMERS AND MCI CUSTOMERS**
1118 **FROM GOING THROUGH.³⁸ WHAT IS YOUR RESPONSE?**

1119 A. This is not true. Calls to MCI's end users from SBC Illinois' end users would be routed
1120 per the Local Exchange Routing Guide ("LERG"). This means that if MCI has its codes
1121 appropriately entered in the LERG, shown to the appropriate SBC Illinois serving tandem
1122 within an area MCI is serving, SBC Illinois will properly route those calls.

1123

1124 **XII. NIM DEFINITIONS**

1125 **NIM Issue 1** - Should SBC ILLINOIS' definition of "Access Tandem Switch" be
1126 included in the Agreement?

1127

1128 **NIM Issue 2** - Should SBC ILLINOIS' definition of "ISP Bound Traffic" be included
1129 in the Agreement?

1130

1131 **NIM Issue 3** - Should SBC ILLINOIS' definition of "Local Tandem" be included in the
1132 Agreement?

1133

1134 **NIM Issue 4** - Should SBC ILLINOIS' definition of "Local/Access Tandem Switch" be
1135 included in the Agreement?

1136

1137 **NIM Issue 6** - Should SBC ILLINOIS' definition of "Local/IntraLATA Tandem Switch"
1138 be included in the Agreement?

1139

1140 **Q. WHAT IS THE DISAGREEMENT ON NIM ISSUES 1, 2, 3, 4 AND 6?**

³⁸ See Price Direct at page 44, line 1157 through page 45, line 1165

1141 A. On each of these issues, SBC Illinois proposes to define a technical term that is used in
1142 the NIM Appendix. MCI opposes this. Significantly, MCI does not contend that the
1143 definitions proposed by SBC Illinois are wrong. Rather, MCI argues that the definitions
1144 are not necessary because they only used in SBC Illinois proposed language that MCI
1145 disputes. (Ricca p. 48).

1146

1147 **Q. HOW DO YOU RESPOND?**

1148 A. On Issues 1, 3 and 4, MCI is simply wrong because the terms “Access Tandem” (Issue
1149 1), “Local Tandem” (Issue 3) and “Local/Access tandem” (Issue 4) are used in language
1150 agreed to by MCI. For example, the term “Access Tandem” appears in sections 8.1, 9.1
1151 and 9.2 of the NIM Appendix in agreed-upon language. Similarly, “Local Tandem”
1152 appears in section 8.3.1 in agreed-upon language and the term “Local Access Tandem”
1153 appears in section 9.2 in agreed-upon language. Since those terms are used in
1154 uncontested language, they should be defined in the Agreement.

1155

1156 As for Issues 6, MCI does dispute the sections in which this term is used. (sections 8.8.1
1157 and 22.5). If, however, the Commission adopts SBC Illinois’ language for those sections,
1158 it should also adopt the definitions for the terms used in that section.

1159

1160 **Q. WHY IS IT IMPORTANT TO SBC ILLINOIS THAT THE**
1161 **INTERCONNECTION AGREEMENT DEFINE THE FOUR (4) TYPES OF**
1162 **TANDEM SWITCHES YOU IDENTIFY ABOVE?**

1163 A. SBC Illinois' language in Appendix NIM describes the switch types in SBC Illinois'
1164 network and lays the foundation for understanding the obligations of the Parties to
1165 establish trunking for interconnection with SBC Illinois' network. The proposed
1166 definitions accurately describe the four types of tandems that SBC Illinois has deployed
1167 in its network. From the standpoint of precision in contract draftsmanship, it is very
1168 beneficial to have clear definitions of each component of switching (as well as routing
1169 and trunking) in the SBC Illinois network, so that confusion is eliminated and both
1170 parties can provision and maintain their respective networks to the highest standards
1171 possible. MCI appears not to dispute the accuracy of these definitions.

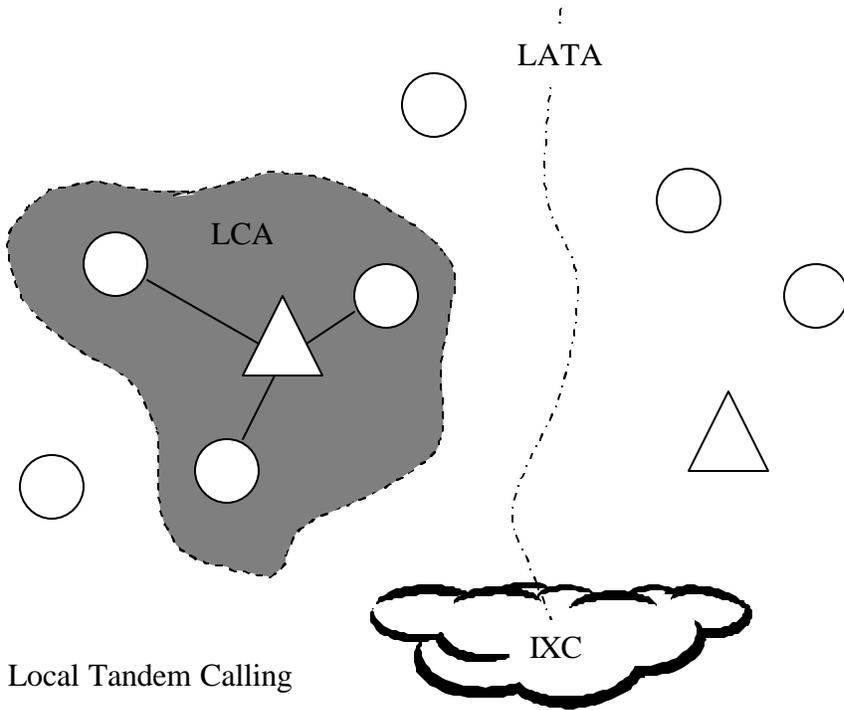
1172

1173 **Q. WHAT TYPES OF TANDEMS DOES SBC ILLINOIS DEPLOY?**

1174 A. All SBC Illinois tandems can be categorized according to the function that the tandem
1175 performs. The function of the tandem refers to the type of traffic the tandem handles.
1176 There are single purpose tandems such as Local Tandems, 911 Tandems and InterLATA
1177 Tandems (also known as Access Tandems). There are also multi-purpose tandems such
1178 as Local and IntraLATA Tandems (known as Local/IntraLATA Tandems); and there are
1179 Combined Local, IntraLATA, and InterLATA Tandems (known as Local/Access
1180 Tandems).

1181 **Q. WHAT IS A LOCAL TANDEM?**

1182 A. A Local Tandem carries calls between End Offices originating and terminating within the
1183 same Local Calling Area ("LCA") as depicted below.



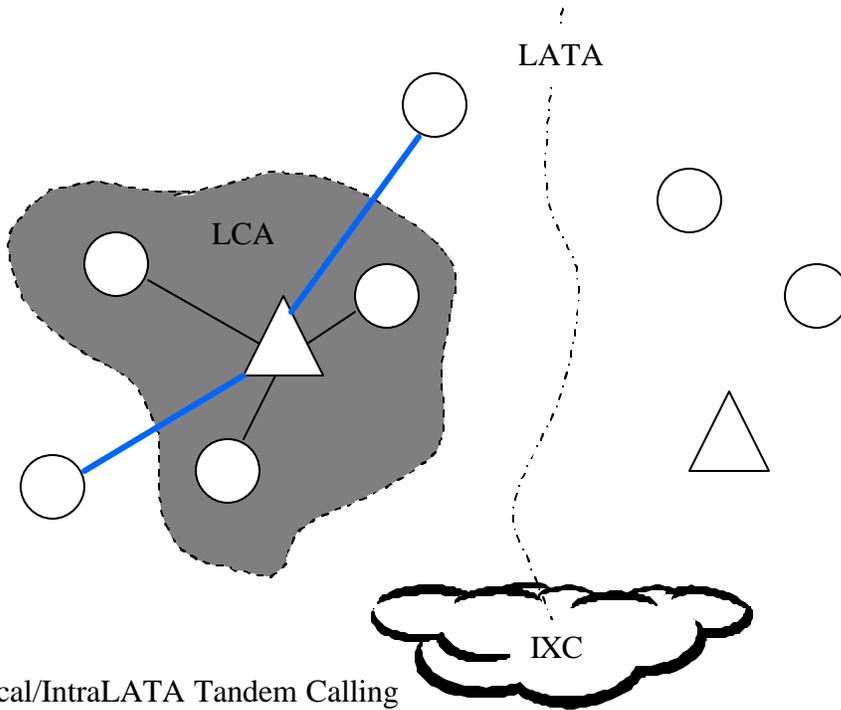
Local Tandem Calling

1184

1185

1186 **Q. WHAT IS A LOCAL/INTRALATA TANDEM?**

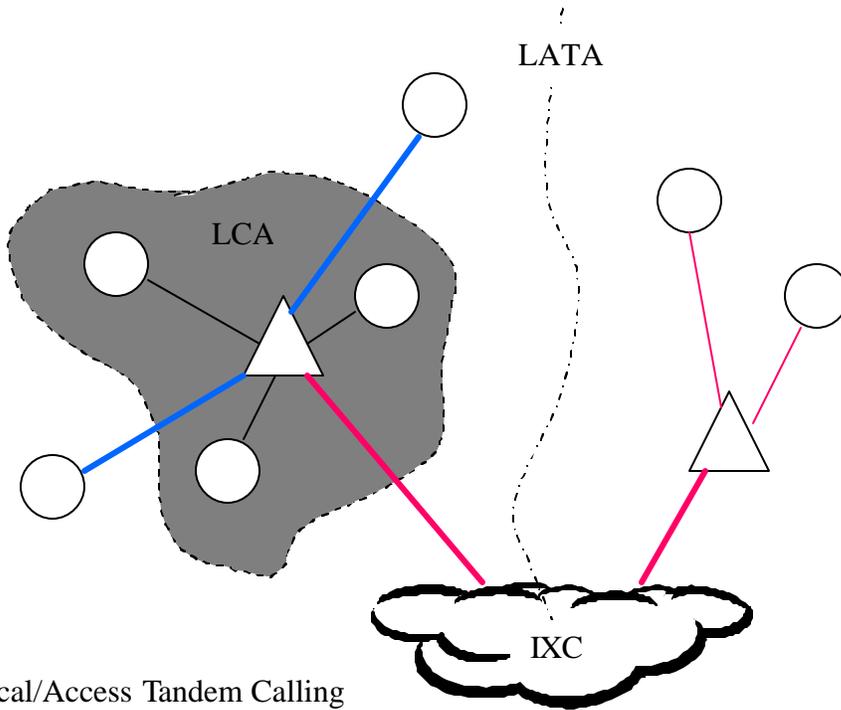
1187 A. A Local/IntraLATA Tandem carries calls between End Offices within the LCA as
1188 described above as well as calls between End Offices within the LATA not carried by an
1189 Interexchange Carrier (“IXC”) as depicted below. This type of IntraLATA traffic is
1190 commonly referred to as IntraLATA Toll.



1191 Local/IntraLATA Tandem Calling

1192 **Q. WHAT IS A LOCAL/ACCESS TANDEM?**

1193 A. A Local/Access Tandem carries calls as described above for Local/IntraLATA Tandems
1194 as well as IntraLATA and InterLATA calls carried by an IXC as depicted below.



Local/Access Tandem Calling

1195

1196

1197 **Q. WHAT IS AN ACCESS TANDEM?**

1198 A. An Access Tandem is a switch that is designed and engineered to provide access between
1199 the Local Exchange Carrier (“LEC”) Network and the Inter-exchange Carrier Network.

1200 An Access Tandem provides end users in the LEC Network with access to an IXC they

1201 have chosen to handle Inter-LATA Long distance calls. An Access Tandem also

1202 provides the IXCs access to the end users in the LEC Network for terminating calls from

1203 end users in other LATAs. Sometimes, an Access tandem is also referred to as a “Feature

1204 Group D” tandem, or as an “Equal Access” tandem, or as an Inter-LATA “ Tandem.

1205

1206 **Q. ARE THERE ANY ATTRIBUTES TO AN ACCESS TANDEM THAT WOULD**
1207 **JUSTIFY A MATERIAL CHANGE IN SBC ILLINOIS' PROPOSED**
1208 **DEFINITION ?**

1209 A. No. An Access Tandem is an Access Tandem. The definition provided above is an
1210 industry accepted standard, and I am not sure why MCI objects to the definition as
1211 proposed by SBC Illinois.

1212 **NIM Issue 2 -** Should SBC ILLINOIS' definition of "ISP Bound Traffic" be included
1213 in the Agreement?
1214

1215 **Q. WHAT IS THE DISAGREEMENT ON NIM ISSUE 2?**

1216 A. This is another definitional issue. MCI objects to the term because it does not believe
1217 that it establishes a meaningful distinction for purposes of reciprocal compensation.
1218 (Ricca pp 49-50). As Mr. McPhee explains, however, if the Commission adopts SBC
1219 Illinois' approach in the Reciprocal Compensation Appendix, it will be necessary to
1220 define this term in the way SBC proposes. (See Mr. McPhee's discussion of Reciprocal
1221 Compensation Issue 1).

1222

1223 **NIM Issue 8 -** Should SBC ILLINOIS' definition of "Offers Service" be included in the
1224 Agreement?

1225

1226 **Q. WHAT IS THE DISAGREEMENT ON NIM ISSUE 8?**

1227 A. This issue has been settled by moving the disputed language for the term "offers service"
1228 into SBC Illinois' proposed section 3.9. Nonetheless, MCI witness Ricca has addressed
1229 NIM Issue 8 on page 48 of his testimony. SBC Illinois intends to treat NIM Issue 8 as

1230 settled, and intends to support its proposed language in its discussion of section 3.9,
1231 which is addressed in NIM Issues 14 and 15.

1232

1233 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

1234 A. Yes it does, however, I reserve the right to supplement as required.