

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 08-0105

**Rebuttal Testimony of James W. Hamiter
On Behalf of AT&T Illinois**

AT&T Illinois Exhibit 2.1

(Public Version)

REVISED July 17, 2008

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- 30 b. "jointly provisioned"
31 c. "split by the two companies" in regard to the cost of the connecting
32 facility"
33 d. "Jointly owned," in regard to the ownership of the connecting facility;
34
35 3. I refute Mr. Noack's claim that the location of the Point of Interconnection ("POI")
36 between AT&T Illinois and Global Illinois is the SONET linear fiber chain; and,
37
38 4. I address the nature of the traffic exchanged between AT&T Illinois and Global
39 Illinois and provide evidence that this traffic is not Enhanced Service Provider
40 ("ESP") traffic as Mr. Noack and Mr. Scheltema suggest in their respective
41 testimonies.
42

43 **Q. DO YOU HAVE ANY EXHIBITS THAT SUPPORT YOUR REBUTTAL**
44 **TESTIMONY?**

45 A. Yes. I have the following exhibits:

- 46 1. Schedule JWH-5, which illustrates a SONET Ring used to connect four points
47 within a Network;
48
49 2. Schedule JWH-6, which illustrates an Add/Drop Linear Chain SONET, which
50 connects three network points;
51
52 3. Schedule JWH-7, which illustrates a Point-to-Point Linear Chain SONET, which
53 connects two points in a network;
54
55 4. Schedule JWH-8, which is an illustration of the SONET facilities between the
56 AT&T Illinois La Grange Tandem Building and the Global NAPs Networks, Inc.
57 Oak Brook "GZ" building;
58
59 5. Confidential Schedule JWH-9, which is a summary of the AT&T Illinois Three
60 Minute Reports that show all calls, longer than three minutes in duration, which
61 originated on the AT&T 12-State Network¹ and were delivered to AT&T Illinois
62 by Global Illinois, from January 2005 through April 2008;
63
64 6. Confidential Schedule JWH-10, which shows the Originating and Terminating Peg
65 Counts on every Global Illinois trunk group for the Study Week of 23 June 2008;
66 and
67

¹ For the purpose of this proceeding, listed alphabetically as Arkansas, California, Illinois, Indiana, Kansas, Texas, Michigan, Missouri, Nevada, Ohio, Oklahoma, and Wisconsin.

68 7. Confidential Schedules JWH-11 through JWH-14, which are copies of four of the
69 thirty-nine Monthly raw-data Three-Minute Reports for the period January 2005
70 through April 2008-- specifically for 10 May 2005, 9 May 2006, 8 May 2007, and
71 8 April 2008. Because of the large size of the raw reports, only four reports were
72 selected to limit the size and number of the documents. Copies of all reports during
73 the January 2005 to April 2008 period may be obtained upon request.
74

75 **III. SONET**
76

77 **Q. FOR WHAT DOES THE TERM “SONET” STAND; WHAT DOES IT DO; AND**
78 **WHY IS IT USED?**

79 A. The term SONET is an acronym that stands for Synchronous Optical Network. It is a type
80 of facility used by AT&T Illinois and other Local Exchange Carriers (“LECs”) to connect
81 points within their respective networks. Prior to SONET, fiber terminal equipment
82 transmission rates varied from vendor to vendor, and sometimes transmission rates varied
83 within the product lines of individual vendors. SONET was developed to standardize
84 transmission rates among the different manufacturers of fiber equipment. SONET
85 technology enabled manufacturing vendors to standardize their communication and
86 transmission rates to allow for one manufacturer’s equipment to communicate with and
87 transmit to another manufacturer’s equipment.
88

89 **Q. DOES SONET PROVIDE BENEFITS OVER ASYNCHRONOUS FIBER SYSTEMS**
90 **OTHER THAN STANDARDIZED TRANSMISSION RATES?**

91 A. Yes. Here are some of the other benefits of SONET over asynchronous fiber optic
92 systems:

93 1. SONET created a more intelligent architecture that could be easily operated,
94 administered, managed and provisioned (“OAM&P”) remotely through the use
95 of the Synchronous Data Communications Channel (“SDCC”);
96

- 97 2. SONET decreased the equipment costs of deploying and augmenting SONET
98 systems as compared to asynchronous systems;
99
- 100 3. SONET offered more efficient use of available bandwidth through a capability
101 called add-drop multiplexing;
102
- 103 4. SONET allows for the creation of diverse self-healing networks; and
104
- 105 5. SONET eliminated potential points of failure associated with back-to-back
106 multiplexing, which was the typical way asynchronous fiber systems were
107 previously linked or connected to each other.
108

109 **Q. HOW IS SONET DEPLOYED IN A TYPICAL NETWORK?**

110 A. There are several configurations in which a SONET system can be designed and deployed
111 within a network. Among these are a Ring configuration, a Linear Add/Drop Chain
112 configuration where more than two network points or locations are involved, and a point-
113 to-point linear chain where only two locations are involved.

114

115 **Q. WHAT IS A “SONET RING”?**

116 A. Exhibit JWH-5 illustrates a SONET Network that connects four points in a network. The
117 “ring” characteristic can clearly be recognized in this drawing. The SONET facilities,
118 connecting each of the four points in this drawing, do not have to have facility diversity in
119 order to protect the network in the event one of the inter-office SONET systems is
120 inadvertently or accidentally disabled. Should that occur, the self-healing properties of a
121 SONET ring cause the re-routing of circuits in the reverse direction to occur automatically.
122 Manual intervention can also be accomplished from a remote maintenance center through
123 the use of the SDCC when needed. Path diversity in a SONET ring provides additional
124 protection in the event of an interruption of a fiber facility between the various pieces of
125 SONET equipment, which are commonly referred to as nodes.

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Q. WHAT OTHER SONET RINGS ARE EMPLOYED BY TELECOMMUNICATIONS CARRIERS, WHICH MIGHT STILL BE CONSIDERED A SONET RING?

A. There are also SONET Rings that are referred to as Collapsed SONET Rings. A Collapsed SONET ring is a ring in which both paths of the ring fibers are held within the same sheath or conduit. This type of SONET architecture is still a ring, but it does not provide facility-route diversity between the various points in the network it connects. Both types of ring architecture—Ring and Collapsed Ring—occur throughout the telecommunications industry. Both a true SONET Ring and a Collapsed SONET Ring are capable of remote OAM&P through the SDCC.

Q. WHAT IS A LINEAR ADD/DROP CHAIN SONET SYTEM?

A. Exhibit JWH-6 illustrates a Linear Add/Drop Chain SONET Application. As depicted in the illustration, this application of SONET is used where there are three or more network points to connect with SONET facilities. As with Ring architecture, OAM&P is accomplished with SDCC.

Q. WHAT IS A POINT-TO-POINT LINEAR CHAIN SONET SYTEM?

A. Exhibit JWH-7 illustrates a point-to-point linear chain between two locations. This configuration is only used between two network points.

151 **IV. REBUTTAL OF MR. NOACK'S INTERCONNECTION ARCHITECTURE**
152 **TESTIMONY**
153

154 **Q. HAVE AT&T ILLINOIS AND GLOBAL ILLINOIS INTERCONNECTED WITH A**
155 **SONET RING, AS MR. NOACK STATES IN HIS DIRECT TESTIMONY?**

156 A. No, AT&T Illinois does not use SONET Rings to implement interconnection with other
157 carriers—which includes Global Illinois. Contrary to what Mr. Noack implies in his direct
158 testimony, the SONET system between AT&T and Global Illinois is not “a two way
159 ring.”² Mr. Noack has mischaracterized the interconnection architecture at issue in this
160 proceeding.

161
162 **Q. IF THE INTERCONNECTION BETWEEN AT&T ILLINOIS AND GLOBAL**
163 **ILLINOIS IS NOT A SONET RING, AS MR. NOACK SUGGESTS, THEN WHAT**
164 **IS IT?**

165 A. AT&T Illinois does use SONET systems and facilities to implement interconnection with
166 other carriers. Whenever AT&T Illinois and the other carrier mutually agree to
167 interconnect using SONET facilities, AT&T only uses a Linear Point-to-Point SONET
168 Architecture to effect those interconnections. Such is the case in its interconnection with
169 Global Illinois. AT&T Illinois and Global Illinois interconnect by way of a Point-to-Point
170 Linear Chain SONET, as described in the Amendment to the Interim Agreement. Ms.
171 Pellerin has provided testimony that addresses both the Interim Agreement and the
172 Amendment to the Interim Agreement in detail.

173

² Noack Direct, p. 1, lines 21-22.

174 Exhibit JWH-8 illustrates the SONET facilities between AT&T Illinois' La Grange
175 Tandem building (CLLI Code "LGRCILLG") and Global Illinois' (or Global NAPs
176 Networks, Inc.'s) Oakbrook building (CLLI Code "OKBRILOA"). The DS3s that Global
177 Illinois ordered from AT&T Illinois and that AT&T Illinois has provisioned to Global
178 Illinois are provisioned over (*i.e.*, are carried on) an OC-48 system, but not in the way Mr.
179 Noack describes.

180
181 Starting at the La Grange Building in Exhibit JWH-8, these DS3s are provisioned over the
182 AT&T Illinois OC-48 SONET Ring facility between the AT&T Illinois La Grange
183 building and the AT&T Illinois Oak Brook building. This SONET facility is part of
184 AT&T Illinois' Inter-Office facilities and is wholly owned by AT&T Illinois. In addition
185 to carrying the DS3 special access services ordered by Global Illinois, this OC-48 also
186 serves as a backbone and provides transmission capacity for certain portions of AT&T
187 Illinois' interoffice trunking and special services networks. This SONET ring also may be
188 used to provide services to other AT&T Illinois customers that purchase special access
189 service or high capacity circuits from AT&T Illinois. This is not a jointly owned and
190 provisioned SONET facility, as Mr. Noack suggests.³

191
192 At the AT&T Illinois Oak Brook building, two fibers from AT&T Illinois' Oak Brook
193 Loop facilities were used to provision the OC-48 Point-to-Point Linear Chain SONET to
194 Global Illinois' (or Global NAPs Networks, Inc.'s) Oak Brook building (CLLI Code
195 "OKBRILGZ").

³ Noack Direct, p. 2, lines 37-38 and p. 3, line 64.

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Q. WHY IS A LINEAR POINT-TO-POINT CHAIN THE ONLY TYPE OF SONET ARCHITECTURE AT&T ILLINOIS USES TO INTERCONNECT WITH OTHER CARRIERS?

A. As I stated above in my technical description of SONET Rings, SONET Rings are capable of provisioning and maintenance from a remote center or other location. This is accomplished by means of the SONET Synchronous Data Communications Channel (“SDCC”). Both the SONET Ring system and the Add/Drop Linear Chain SONET system require the SDCC to be enabled in order to function properly. With the SDCC Channel enabled, all interconnected SONET systems can be accessed by anyone with access to that channel.

A Linear Point-to-Point SONET Chain system does not require the SDCC to be enabled. Therefore, with the SDCC turned off, or disabled, the Linear Point-to-Point SONET system acts as a firewall to prevent any other carrier connected to the AT&T Illinois SONET Network from accidentally accessing another carrier’s SONET Network and inadvertently changing the other carrier’s network configuration. That is the reason AT&T Illinois only interconnects with another carrier by means of a Linear Point-to-Point SONET Chain system, and that is why AT&T Illinois has interconnected with Global Illinois in that manner. Indeed, the parties’ interconnection agreement makes clear that “[w]hen the Parties agree to interconnect their networks pursuant to the Fiber Meet, a single point-to-point linear chain SONET system must be utilized.” Appendix NIM, § 3.4.2.

220 **Q. WHAT DO THE TERMS “JOINTLY PROVISIONED” AND “JOINTLY OWNED”**
221 **MEAN IN REGARD TO A SONET FACILITY?**

222 A. A “jointly provisioned” SONET facility is one in which both parties share in the cost of
223 implementing a SONET system. Typically, one party will provide the necessary fiber for
224 one side of the SONET and the other party will provide fiber for the other side of the
225 SONET. In addition, both parties will provide terminal equipment at their respective ends
226 of the SONET facility. The term “jointly owned” refers to a SONET system that has been
227 paid for by both carriers.

228
229 **Q. WAS THE POINT-TO-POINT LINEAR CHAIN SONET TO GLOBAL ILLINOIS’**
230 **OAK BROOK BUILDING JOINTLY PROVISIONED? IS IT JOINTLY OWNED**
231 **AS MR. NOACK SAYS?**

232 A. No and no. Mr. Noack inaccurately characterizes the Point-to-Point Linear Chain SONET
233 that runs to Global Illinois’ (or Global NAPs Networks, Inc’s) Oak Brook building. That
234 facility is neither jointly provisioned, nor is it jointly owned, as he suggests. This is
235 because AT&T Illinois provided the terminal equipment for the Point-to-Point Linear
236 Chain SONET at its own Oak Brook location, and both fibers required to implement the
237 facility. AT&T Illinois terminated the two fibers onto a Fiber Distribution Frame (“FDF”)
238 within the customer’s premises at the OKBRILGZ building and Global Illinois’ affiliate
239 connected its equipment to AT&T Illinois’ fibers at the FDF. AT&T Illinois cannot “see”
240 beyond the terminal point of these fibers into the network of Global Illinois’ affiliate.
241 Global Illinois provided nothing in the way of equipment or fiber required to implement
242 this OC-48 SONET from LaGrange to Global Illinois’ customer premises at the
243 OKBRILGZ building – including the Point-to-Point Linear Chain SONET – other than that

244 which was required to connect the facility to its equipment located on its own customer
245 premises. In order for the OC-48 SONET facilities referred to in this proceeding to be
246 considered jointly provisioned or jointly owned, Global Illinois (or its affiliates) would
247 have had to provide fibers from its Oak Brook location to AT&T Illinois' LaGrange
248 tandem building. It did not. For that reason, the facility cannot be referred to as either
249 jointly owned or jointly provisioned.

250

251

252 **Q. SO, IS IT ACCURATE TO SAY THE COST OF THE POINT-TO-POINT LINEAR**
253 **CHAIN SONET TO GLOBAL ILLINOIS' OAK BROOK BUILDING WAS "SPLIT**
254 **BY THE TWO COMPANIES," AS MR.NOACK ASSERTS⁴?**

255 A. No, that is not an accurate statement. AT&T Illinois and Global Illinois did not "split the
256 cost" of the Point-to-Point Linear Chain SONET. Global Illinois seems to believe that
257 sharing the cost means AT&T Illinois pays one hundred percent of the cost of the OC-48
258 SONET running from the LaGrange tandem building to the Global premises in Oak Brook
259 (including the Point-to-Point Linear Chain SONET) system, and Global Illinois pays zero
260 percent of that cost.

261

262 **Q. IN HIS TESTIMONY, MR. NOACK ALSO ASSERTS THAT THE POI IS THE**
263 **SONET ITSELF, AND IS NOT AT THE AT&T LA GRANGE TANDEM**
264 **BUILDING.⁵ IS THIS AN ACCURATE STATEMENT?**

⁴ Noack Direct, p. 2, line 41.

⁵ Noack Direct, p. 1, line 23 to p. 2, line 24, p. 3, lines 57-58.

265 A. No. Mr. Noack has not painted an accurate picture of the location of the POI, or the point
266 at which the Parties' two networks meet. The word "Point" in the term Point of
267 Interconnection refers to a point on a network. As I described in my Direct testimony,⁶ "A
268 point in the network can be an office or a building." In that same Q&A, I stated, "A
269 facility is a physical medium used to connect two points in a network." In the case of the
270 OC-48 over which AT&T Illinois provisioned the DS3 services ordered by Global Illinois,
271 it connects two points, those being AT&T Illinois La Grange tandem building – the POI –
272 and Global Illinois' (or Global NAPs Networks, Inc.'s) Oak brook building.
273 Furthermore, AT&T Illinois requires the POI to be located on its network. *See* 47 U.S.C. §
274 251(c)(2)(B) (requiring an ILEC to provide interconnection at points "within" its network).
275 In the instance at hand, the POI cannot be located at the Point-to-Point Linear Chain
276 terminating equipment in the Oak Brook building, because that equipment is at the
277 customer premise and is not on the AT&T Illinois network. Neither can the POI be the
278 SONET fiber, because that fiber is not a point– it is a physical facility several miles long.
279 Contrary to how Mr. Noack has described the location of the POI, it is actually located in
280 the AT&T Illinois tandem building, as described in the Amendment to the Interim
281 Agreement. Indeed, elsewhere in his testimony, Mr. Noack admits that "Global chose to
282 connect to the Illinois Bell network by connecting at a single point - the Illinois Bell
283 tandem switch in La Grange."⁷

284

285 **Q. HAS MR. NOACK CONCEDED IN OTHER PROCEEDINGS THAT A POI IS A**
286 **SINGLE PHYSICAL POINT?**

⁶ Hamiter Direct, p. 5.

287 A. Yes. In the lawsuit brought against Global NAPs, Inc. by The Southern New England
288 Telephone Company (“SNET”) in federal district court in Connecticut, where SNET
289 sought, among other things, recovery of charges for special access services that Global
290 NAPs, Inc. ordered from SNET but refused to pay for, Global NAPs, Inc. made (and lost)
291 an identical argument. Mr. Noack was Global NAPS, Inc.’s witness on this issue at a
292 prejudgment remedy evidentiary hearing. During cross-examination, Mr. Noack testified as
293 follows:

294 Q. (Mr. Binnig). Let me ask my question. There’s no question pending. The
295 physical links where two networks physically attach to each other, okay, that’s the
296 point of interconnection; isn’t that correct?

297 A. (Mr. Noack). That is the theoretical point of interconnection. That’s correct, yes.

298 Q. It is an actual physical point of interconnection. It is not just theoretical. They
299 have to attach physically somewhere, isn’t that correct?

300 A. That’s correct.

301 In this exchange, Mr. Noack correctly concedes that a POI is an “actual physical point of
302 interconnection” where two networks “attach physically.” His unwillingness to make the
303 same concession in this proceeding is puzzling.

304

305 V. **REBUTTAL OF ASSERTIONS MADE BY GLOBAL ILLINOIS REGARDING**
306 **THE NATURE OF THE TRAFFIC EXCHANGED BETWEEN AT&T ILLINOIS**
307 **AND GLOBAL ILLINOIS**
308

309 Q. **WHAT IS A THREE-MINUTE REPORT?**

310 A. A Three Minute Report is a report comprised of call data for calls that are three minutes or
311 more in length. The data comes from the records of calls originated on AT&T’s public
312 switched telephone network (“PSTN”) by AT&T 12-State end users and other end users of

⁷ Noack Direct, p. 1.

313 AT&T's PSTN (*e.g.*, end users served via resale). AT&T is able to match the Calling
314 Party Number ("CPN") records on calls that originated on AT&T's PSTN in the 12 states
315 to the CPN on the calls delivered to AT&T Illinois by any carrier that interconnects using
316 SS7 signaling on their trunk groups.

317
318 From this comparison, AT&T Illinois is able to identify the city and state from which calls
319 have been delivered to its network by a particular carrier. Although the Three Minute
320 Report provides only a sampling of the total call population, and that sampling occurs only
321 on a single day each month, this allows AT&T Illinois to determine whether or not
322 interstate, interLATA, and intraLATA calls that originated on AT&T's PSTN have been
323 routed by the carrier in question to AT&T Illinois' network. Because of the large volume
324 of calls, and large data files that are needed to compile these reports, the report is limited to
325 only the calls that are three or more minutes in duration.

326

327 **Q. PLEASE EXPLAIN THE THREE-MINUTE REPORT SUMMARY YOU HAVE**
328 **PROVIDED IN CONFIDENTIAL SCHEDULE JWH-9.**

329 A. For a single day for each month, AT&T Illinois searched the incoming AMA records for
330 all calls delivered to AT&T Illinois by Global Illinois. AT&T Illinois was able to review
331 data as far back as January 2005 and as recent as April 2008. With the exception of April
332 2006, data for calls at least three minutes in length was captured for a day in each month
333 during that span of time. The results of that search were reviewed for a CPN match to the
334 originating records of end users of AT&T's 12-State PSTN for the same dates in the period
335 of time from January 2005 until April 2008. For easier viewing, the results of those
336 comparisons are listed in Confidential Schedule JWH-9.

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While I reviewed all of the available Three Minute Reports pertaining to Global Illinois in the course of preparing this rebuttal testimony, because of the enormous size of these reports I have attached just four of the reports. These are the Three Minute Reports for May, 2005 (Confidential Schedule JWH-11); May, 2006 (Confidential Schedule JWH-12); May, 2007 (Confidential Schedule JWH-13); and April, 2008 (Confidential Schedule JWH-14).

Q. WHAT INFORMATION PERTINENT TO GLOBAL ILLINOIS’ “ESP/VOIP TRAFFIC” ASSERTIONS CAN BE DERIVED FROM THE SUMMARY OF THE THREE MINUTE REPORTS, AND WHAT DOES IT SHOW FOR THE TRAFFIC EXCHANGED BETWEEN AT&T ILLINOIS AND GLOBAL ILLINOIS?

A. Remember, the only calls shown on the Three Minute Reports are calls for which there is call data from an AT&T ILEC originating switch. By definition, all of the calls shown on the report are calls that originated by an end user served by an AT&T switch within the 12-State footprint identified in footnote 1. None of these are VoIP calls because the AT&T switches in question are TDM switches and cannot originate VoIP calls. This conclusively demonstrates that Global Illinois is wrong when it claims that the traffic it delivers to AT&T Illinois is VoIP that exclusively comes from ESPs.⁸

The summary of the Three Minute Reports in Confidential Schedule JWH-9 also shows that at least as far back as January 2005, Global Illinois delivered to AT&T Illinois a large

⁸ Noack Direct, p. 5, lines 113-114; Scheltema Direct, p. 7, line 144 and lines 150-161; p. 12, lines 265-272.

359 number of calls that were interstate or intrastate switched access traffic that both originated
360 and terminated on the public switched telephone network, from an end user of an AT&T
361 incumbent local exchange carrier or an end user served via the TDM-based switch of an
362 AT&T incumbent local exchange carrier (not an end user of any “ESP” customer of Global
363 Illinois) to an end user of AT&T Illinois. During the forty month time frame in which the
364 thirty nine studies were compiled, the interstate switched access component of the traffic
365 captured by the Three Minute Reports, when represented as a percentage of the total
366 amount of traffic, ranged from a low of *** ***. The interstate
367 switched access component for thirty-three (33) of the thirty-nine (39) study periods were
368 greater than *** ***.

369

370 **Q. ARE THERE ANY OTHER THINGS ABOUT THE THREE MINUTE STUDIES**
371 **THAT NEED TO BE NOTED?**

372 A. Yes. The Three Minute Reports do not capture all of the traditional telephony, originated
373 and terminated on the public switched telephone network, that is sent to AT&T Illinois, but
374 capture only a subset of such traffic. For example, the studies only show information on
375 calls that are no less than three minutes, for only one day out of the month, and they only
376 show calls from end users served by AT&T’s PSTN in AT&T’s 12-State footprint. Thus,
377 the studies do not show interstate switched access calls that are less than three minutes,
378 that are made on other days in the month, that originate on the public switched telephone
379 network in the 38 states outside of the AT&T 12-State footprint, or that originate on the
380 public switched telephone network of other incumbent local exchange carriers within the
381 12 states in the AT&T 12-State footprint (for example, the areas of Illinois where Verizon
382 is the incumbent).

383

384 **Q. WHAT IS A “PEG COUNT STUDY”?**

385 A. A “Peg Count Study,” as the term is used in the telecommunications industry, is a count of
386 all of the calls that are either offered to or carried by a message trunk group over a
387 specified period of time. Registers within the switching machines record and tally, or
388 count, each time a call attempt is made to the trunk group. When this happens, the register
389 is said to have been “pegged.” In the early manual switching days, a hand-held and
390 mechanically actuated counter would have been used. Back then, the peg was audible. In
391 the telecommunications industry today digital registers are used and the counting is
392 automatic and silent, but the term Peg Count is still in use.

393

394 **Q. HOW ARE PEG COUNT STUDIES USED IN THE TELECOMMUNICATIONS**
395 **INDUSTRY?**

396 A. The results of a Peg Count study are typically used in trunk servicing routines and
397 algorithms to size trunk groups, or to determine the need for a trunk group. They can also
398 be used to tell the volume of traffic a trunk group is experiencing, as well as to compare
399 the volume of the traffic experienced in both directions.

400

401 **Q. IS THAT WHAT YOU HAVE DONE WITH THE PEG COUNT STUDY YOU**
402 **HAVE PROVIDED IN CONFIDENTIAL SCHEDULE JWH-10?**

403 A. Yes. I asked my network people to compile a Peg Count study for the traffic on every
404 Global Illinois trunk group. This study was performed during the study week of 23 June
405 2008. The actual time period this report covers is from Monday, 23 June 2008, through

406 Friday, 27 June 2008. Twenty four hours of data was collected for each day of the five day
407 study period.

408

409 **Q. WHAT WERE THE RESULTS OF THAT STUDY AND WHAT DOES IT SHOW**
410 **FOR THE TRAFFIC EXCHANGED BETWEEN AT&T ILLINOIS AND GLOBAL**
411 **ILLINOIS?**

412 A. The results of this study show that there were *** incoming calls delivered by
413 Global Illinois to AT&T Illinois during the five day study period. These were calls
414 delivered to AT&T Illinois by Global Illinois over all of its trunk groups. In addition to
415 this, AT&T Illinois sent *** calls during the study period to Global Illinois.
416 In all, there were *** calls exchanged between AT&T Illinois and Global
417 Illinois during the study period. Of that total, the number of calls Global Illinois sent to
418 AT&T Illinois represents slightly more than *** of the total calls, and the number
419 of calls that AT&T Illinois sent to Global Illinois represents less than *** of the
420 calls.

421

422 **Q. WHAT OTHER INFORMATION REGARDING THE TRAFFIC EXCHANGED**
423 **BETWEEN AT&T ILLINOIS AND GLOBAL ILLINOIS DURING THIS STUDY**
424 **PERIOD CAN ONE GET FROM THIS STUDY?**

425 A. Looking down the first column, labeled TGSN, on the first page of Confidential Schedule
426 JWH-10, you eventually come to the TGSN "LB414834." This row represents Global
427 Illinois' Meet-Point trunk group, or simply stated their Feature Group D trunk group. The
428 number of calls that AT&T Illinois received from Global Illinois over that trunk group
429 during the study period was ***. This information, along with the information

430 obtained in the Three-Minute Reports, is proof that Global Illinois is inappropriately
431 delivering traffic which should be handled by an Interexchange Carrier (“IXC”) switched
432 access trunking arrangement to its Local Interconnection trunk groups.

433

434 **Q. ON PAGE 5 OF HIS TESTIMONY, MR. NOACK STATES THAT GLOBAL**
435 **ILLINOIS’ TRAFFIC IS NOT “TRADITIONAL’ TELEPHONY”. DO YOU**
436 **AGREE?**

437 A. No. I’ve copied the quote from his testimony in which he makes that claim. Starting at
438 line 106, he says:

439 Very simply, Global's traffic is not 'traditional' telephony. In traditional telephony,
440 the carrier would receive calls directly from another carrier. For traditional traffic
441 subject to interstate or intrastate access charges, the calling party would dial a 1+
442 code to route the call to an interexchange carrier. Global is not a long distance
443 carrier; nor does Global receive traffic from any carrier using a 1+ method.
444 Indeed, Global does not have interconnection directly with long distance carriers -
445 period.

446

447 Each of his unsupported factual assertions in this quote can be easily disputed given the
448 information I have provided in the reports I previously discussed.

449

450 Mr. Noack states that Global is not a long distance carrier, yet I have introduced a great
451 deal of evidence that refutes this claim. The information I have provided in the Three
452 Minute Reports shows that Global Illinois is delivering a large volume of “traditional”
453 telephony interstate switched access traffic to AT&T Illinois.

454

455 Mr. Noack also asserts that Global Illinois doesn't receive traffic from any carrier using a
456 1+ method. The Three Minute Reports also refute this assertion. AT&T Illinois has

457 shown that its own end users, and other end users served by an AT&T switch in 11 other
458 states, have dialed “1 +” calls that traveled across Global Illinois’ (or Global Networks’)
459 network.

460
461 While Global Illinois may or may not be directly interconnected with traditional long
462 distance carriers, there are a lot of long distance calls transiting its network, as shown in
463 the Three Minute Report summary. And while Global Illinois may assert its traffic is not
464 “‘traditional’ telephony,” there are an awful lot of traditional calls in their traffic.

465

466 **Q. HOW DO YOU RESPOND TO GLOBAL ILLINOIS’ ASSERTION THAT ITS**
467 **TRAFFIC IS RECEIVED FROM ENHANCED SERVICE PROVIDERS (“ESPS”)**
468 **AND SHOULD BE ELIGIBLE FOR EXEMPTION FROM ANY INTERCARRIER**
469 **COMPENSATION OBLIGATIONS?**

470 A. Mr. Noack’s position is based on another unsupported factual assertion which the actual
471 call data refutes:

472 All of Global's outbound traffic comes to it from ESPs, not individual customers
473 making voice calls or third party carriers transmitting voice calls.⁹

474 The Peg Count Study shows that the traffic exchanged between AT&T Illinois and Global
475 Illinois is ***

476 ***. This traffic
476 pattern is not characteristic of ESP, or Enhanced Service Provider, type traffic. ESP

477 carriers typically provide added value or enhancements to a call, such as voice mail.

478 AT&T Illinois end users are more likely to originate calls to the ESP—not the other way

⁹ Noack Direct, p. 5, lines 113-114.

479 around. The Global Illinois' traffic patterns do not conform to traffic patterns normally
480 exhibited by ESP traffic.

481

482 **Q. DOES THE GLOBAL ILLINOIS TRAFFIC EXHIBIT A PATTERN THAT CAN**
483 **BE ATTRIBUTED TO A VOIP PROVIDER?**

484 A. No. Voice over Internet Protocol ("VoIP") traffic from a VoIP provider would generally
485 display a relatively even distribution of incoming and outgoing calls. The Peg Count
486 Report proves that Global Illinois' traffic is asymmetrical in that *** of
487 the traffic is incoming to AT&T Illinois.

488

489 **VI. CONCLUSION**

490

491 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

492 A. Yes it does.

CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing Revised Rebuttal Testimony of James W. Hamiter was served on the following parties by U.S. Mail and/or electronic transmission on July 17, 2008.

/s/ Mark R. Ortlieb

Mark R. Ortlieb

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