

Before the  
ILLINOIS COMMERCE COMMISSION

In the Matter of the Petition of  
SCC Communications Corp.  
for Arbitration Pursuant to Section 252(b)  
of the Telecommunications Act of 1996  
to Establish an Interconnection Agreement  
with SBC Communications Inc.

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)  
**OFFICIAL FILE**

Docket No. 00-0769

I.C.C. DOCKET NO. \_\_\_\_\_

SCC

Exhibit No. 16

Witness \_\_\_\_\_

Date 2/5/01

Reporter SR

ADDITIONAL SUPPLEMENTAL DIRECT TESTIMONY

AND

VERIFIED STATEMENT

OF

CYNTHIA CLUGY

ON BEHALF OF

SCC COMMUNICATIONS CORP.

JANUARY 31, 2001

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

2 A. My name is Cynthia Clugy. My business address is 6285 Lookout Road, Boulder,  
3 Colorado 80301-3343.

4 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR PRESENT**  
5 **POSITION?**

6 A. I am employed by SCC Communications Corp. as Manager of Regulatory Compliance.

7 **Q. HAVE YOU TESTIFIED IN THIS PROCEEDING BEFORE?**

8 A. Yes. I submitted my Direct Testimony and Verified Statement in this proceeding on  
9 December 19, 2000, as well as my Supplemental Testimony and Verified Statement on  
10 January 10, 2001. My professional background and current job responsibilities are  
11 described in my Direct Testimony.

12 **Q. WHAT IS THE PURPOSE OF YOUR ADDITIONAL SUPPLEMENTAL**  
13 **TESTIMONY?**

14 A. The purpose of my Additional Supplemental Testimony is to explain and support SCC's  
15 positions on the issues and concerns raised by the Staff of the Illinois Commerce  
16 Commission ("Commission") in its verified statements, dated January 26, 2001 and  
17 January 28, 2001.

18 **Q. PLEASE CLARIFY SCC's POSITION WITH RESPECT TO ISSUE AIT-1.**

19 A. SCC will have a relationship with PSAPs that are affected by SCC's services.  
20 Specifically, SCC will complete Exhibit I (or its equivalent) in conjunction with the  
21 delivery of requests for emergency services by telematics customers. As I explained in  
22 my Supplemental Testimony, the information required in Exhibit I is available only from  
23 the E9-1-1 Authority. As a result, the E9-1-1 Authority will be aware of the role played

1 by SCC in the delivery of emergency calls, and by providing the information SCC needs  
2 to complete Exhibit I, the E9-1-1 authority will acknowledge and authorize SCC's role.  
3 Accordingly, SCC will obtain authorization from the E9-1-1 Authority to route such  
4 emergency call traffic to the PSAPs.

5 PSAPs also will be aware of SCC's role in 9-1-1 call delivery where SCC provides  
6 services to wireless carriers and other CLECs. Wireless carriers and CLECs will have  
7 their own independent relationships with the PSAPs, and those carriers will complete  
8 similar documentation in conjunction with their provisioning of 9-1-1 service. Where a  
9 carrier migrates to SCC's services, the carrier will amend its documentation to reflect the  
10 new service arrangement with SCC. Thus, PSAPs will be made aware of SCC's role in  
11 9-1-1 call delivery.

12 **Q. WILL SCC PROVIDE INFORMATION TO PUBLIC SAFETY AGENCIES TO  
13 ENABLE THEM TO MEET THE REQUIREMENTS OF SECTIONS 725.205(c)(5)  
14 AND 725.210(d)(5)?**

15 **A.** Yes. SCC will provide whatever information is necessary for a public safety agency to  
16 meet its obligations under sections 725.205(c)(5) and 725.210(d)(5). As described above,  
17 local public agencies will have access to information about SCC and will be aware of  
18 SCC's role in 9-1-1 and emergency call delivery. Should an agency require additional  
19 information, SCC will provide such additional information. SCC has assisted in the  
20 establishment of multiple 9-1-1 systems throughout the United States and is keenly aware  
21 of the requirements to build such systems and the need for public safety agencies to have  
22 accurate and complete information about local exchange carriers.

23 **Q. PLEASE COMMENT ON STAFF'S TESTIMONY REGARDING ISSUE AIT-2.**

1 A. SCC agrees with Mr. Gasparin that "all carriers should be notified when a change in the  
2 contractual relationship between companies occur that [a]ffect 9-1-1 services." In my  
3 view, however, it is inequitable to place the notification burden on SCC alone. Thus, the  
4 question is not whether such notice should be given, but how and by whom should such  
5 notice be given.

6 In the first place, certain notification processes already exist. For example, when a CLEC  
7 or wireless carrier transitions to SCC's services, Ameritech Illinois necessarily will know  
8 that the competitive provider is seeking alternate trunking arrangements. In these  
9 instances, additional notification requirements are unnecessary.

10 Moreover, a notification requirement must be competitively neutral, equitable, and  
11 appropriate for the competitive marketplace. In the local service context, Ameritech  
12 Illinois has in place a competitively neutral process whereby local service customers are  
13 transitioned to or from Ameritech Illinois. A similar competitively neutral process is  
14 needed for competitive 9-1-1 and emergency services.

15 The notification requirement also should apply to all carriers, not just SCC. CLECs and  
16 wireless carriers should be required to notify other affected carriers when they migrate to  
17 SCC's services. Likewise, Ameritech Illinois should be required to notify SCC when a  
18 CLEC or wireless carrier migrates from SCC's services to Ameritech Illinois' services.  
19 Rather than place unilateral notification requirements on SCC, the Commission needs to  
20 promulgate rules that establish a notification procedure that is appropriate for the  
21 competitive marketplace. SCC would be pleased to assist the Commission in such an  
22 undertaking and to participate in any proceeding that the Commission establishes to  
23 determine an appropriate notification framework.

1 Q. PLEASE COMMENT ON STAFF'S DISCUSSION OF ISSUE AIT-6.

2 A. It is my understanding that issue AIT-6 has been resolved. The parties have agreed that  
3 where CCSS7 trunks are available and the applicable E911 Authority concurs that  
4 CCSS7 trunks can be used for 911 and emergency calls, the parties will deploy CCSS7  
5 trunks rather than CAMA trunks. In doing so, SCC has every intention of complying  
6 with 83 IL Administrative Code § 725.500 and all other applicable rules and regulations  
7 of the Commission.

8 Q. PLEASE CLARIFY SCC'S POSITION ON ISSUE I.K.

9 A. Issue I.K involves SBC's deposit requirement. SCC has requested that Ameritech Illinois  
10 make a threshold determination on SCC's credit worthiness before requiring a deposit. It  
11 is my understanding that the parties continue to negotiate the deposit requirement.

12 Specifically, I understand that SBC currently is reviewing SCC's credit history to  
13 determine whether a deposit is required and if so, the magnitude of that deposit.

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15 A. Yes.