

ICC Docket No. 12-0550
AT&T Illinois Exhibit 2.1
Carl C. Albright, Jr. Rebuttal Testimony

Schedule CCA-8

Illinois Commerce Commission
Docket No. 12-0550
Staff Data Request JZ 2.02

Request:

Schedule CCA-1 depicts AT&T Illinois U-verse Network. Please explain whether it would be technically feasible to connect AT&T Illinois VHO to Sprint's network as AT&T Illinois currently connects its VHO to AT&T Corp. If not, please identify and explain why such connection is technically infeasible.

Response: It would not be technically feasible to connect Sprint's network to the AT&T Illinois VHO. The reasons are set forth below. First, however, AT&T Illinois notes that Sprint has not suggested that it could connect at the VHO, perhaps because Sprint recognizes that to do so would not be technically feasible. On the contrary, Sprint proposes the following language for Attachment 2, Section 2.2.2:

When Sprint designates IP Interconnection and the Parties utilize IP Interconnection, Sprint and ATT ILLINOIS will exchange Authorized Services traffic at the existing internet exchange points ("IXP" or "IP POI"), where they are currently interconnected (e.g., Los Angeles, San Jose, Seattle, Chicago, Dallas, D.C. Metro, Miami, New York City, and or Atlanta) or such additional IP POIs as may be mutually agreed.

Those "existing internet exchange points" are not AT&T Illinois' VHOs, and are not anywhere else shown on Schedule CCA-1. Sprint advocated its proposed language in the Direct Testimony it filed on December 5, 2012 (*see* Burt Direct at lines 762-775) even though AT&T Illinois had given Sprint a description of U-verse traffic flow, including the diagram identified as CCA-1, in its responses to Sprint Data Requests on November 7, 2012. Presumably, if Sprint believed that IP-to-IP interconnection could be established at the VHO, Sprint would have at least acknowledged that possibility in its testimony.

In any event, if Sprint were to connect with AT&T Illinois at the VHO, calls from an AT&T Illinois U-verse customer to a Sprint customer would not complete, and neither would calls from a Sprint customer to an AT&T Illinois U-verse customer. In addition, AT&T's U-verse service would become non-functional, at least for all voice calls made by U-verse customers, regardless of to whom.

Calls from an AT&T U-verse customer to a Sprint customer would not work because the data transmitted by the U-verse customer must be processed in the AT&T Corp. network to determine where to send the U-verse customer's transmissions. Not all transmissions by the U-verse customer are voice calls, and not all voice calls made by U-verse customers are destined for Sprint. Processing,

which is performed by AT&T Corp., and not by AT&T Illinois, is necessary in order to determine what data to send where. No call processing is done on the part of the pathway between the customer and the VHO; the only thing that happens there is that data sent by U-verse customers is transported to AT&T Corp. for processing. That includes not only the data that constitutes calls to Sprint customers, but also calls to customers of other carriers, as well as transmissions that are not voice calls, such as internet searches, e-mail, etc. If Sprint connected with AT&T Illinois at the VHO, Sprint would intercept the unprocessed data stream, including all the data that is not destined for Sprint, and Sprint's network would not know what to do with it. The call processing that is done by the AT&T Corp. network is an integral part of the service that is being provided to the AT&T Illinois U-verse customer. For Sprint to "interconnect" at the VHO would be akin to a CLEC with a traditional TDM network interconnecting with AT&T Illinois' network at an intermediate point of transport between an AT&T Illinois customer and an AT&T end office. Such an "interconnection" would not work, because it would eliminate the call processing that must be done at the AT&T Illinois end office, which directs some traffic to Sprint and other traffic elsewhere, so that Sprint would wind up intercepting not only the AT&T Illinois traffic from that customer that is destined for Sprint, but also all other traffic from that AT&T Illinois customer.

Calls from a Sprint customer to an AT&T Illinois U-verse customer would not work because, among other reasons, Sprint's network will not know the IP addresses of AT&T Illinois' U-verse customers. That information resides in the AT&T Corp. network, and would not be accessed if Sprint connected to AT&T Illinois at the VHO. For that matter, Sprint does not know what phone numbers are supported behind each individual AT&T Illinois VHO (again, that information resides in the AT&T Corp. network) and so would have no way to determine to which VHO any particular call should be sent. (And, of course, if Sprint did have that information, it would have to connect at each VHO in order for its customers to be able to reach all AT&T U-verse customers.)

Differently stated, the VHO is merely an aggregation point for video and IP data streams, and the data streams are – and must be – delivered to or sent from AT&T Corp. for disaggregation and management. The VHO only provides multiplexing and transport for the subscribed video services and the IP data stream (whatever that may encompass, including any internet data as well as any VoIP that may be contained within the data stream) destined for U-verse end users. Any VoIP services are embedded within the data stream destined for AT&T Corp. and are identified, managed and redirected as appropriate (whether over the IP backbone for IP-to-IP delivery, or via TDM conversion for deliver to the PSTN), by AT&T Corp. AT&T Illinois does not control or monitor the VoIP data stream to identify originating or terminating parties of the VoIP call, and, in fact, is not even aware of what, if any, VoIP calls *are* being completed over this data stream.

Because any VoIP traffic is already embedded within the data stream being delivered by AT&T Corp., AT&T Illinois does not have the ability at its VHO, or at any of the other various components in the U-verse network, to direct, manage, or deliver traffic to a particular an end user, whether originated by an AT&T Illinois U-verse end user destined for a third party end user, or terminating from a third party end user to an AT&T Illinois U-verse end user. Any such management of VoIP traffic is managed, directed and delivered by AT&T Corp. to/from the appropriate AT&T Illinois U-verse end user.

Responsible Person: Carl Albright