

**FILED<sup>2</sup>**

APR 23 2008

Missouri Public  
Service Commission

Exhibit No. \_\_\_\_\_

Issue: Billing, Accounts & CSRs

Witness: Pam Hankins

Type of Exhibit: Rebuttal Testimony

Sponsoring Party: CenturyTel of Missouri, LLC

Case No.: LC-2008-0049

Date Testimony Prepared: February 15, 2008

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Complaint of Charter Fiberlink, LLC Seeking )  
Expedited Resolution and Enforcement of )  
Interconnection Agreement Terms Between )  
Charter Fiberlink-Missouri, LLC and CenturyTel )  
of Missouri, LLC. )

Case No. LC-2008-0049

**REBUTTAL TESTIMONY OF**

**PAM HANKINS**

**ON BEHALF OF CENTURYTEL OF MISSOURI, LLC**

February 15, 2008

Exhibit No. 9  
Case No(s) LC-2008-0049  
Date 4/2/08 Rptr MV

**EXHIBIT**

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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **PAM HANKINS**

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

5 A. My name is Pam Hankins. My business address is 100 CenturyTel Drive, Monroe, LA  
6 71203.

7 **Q. Are you the same Pam Hankins who filed direct testimony in this proceeding?**

8 A. Yes.

9 **Q. What is the purpose of your rebuttal testimony?**

10 A. The purpose of my rebuttal testimony is to respond to the types of charges Charter has  
11 been assessed and what charges CenturyTel is attempting to recover. I will also describe  
12 the customer record research process and the process Charter utilizes to provide directory  
13 listings for publication in CenturyTel's directories, which is in direct contrast to what is  
14 described in Charter's witness, Mr. Ted Schremp's testimony.

15 **Q. Charter's witness, Mr. Ted Schremp, states in his testimony that CenturyTel**  
16 **improperly billed Charter for "hundreds of thousands of dollars" over the last five**  
17 **years. Would you care to address this allegation?**

18 A. Yes. Mr. Schremp segregated the charges assessed to Charter into four categories, 1) the  
19 charges CenturyTel assessed Charter for processing port orders (LSRs); 2) customer  
20 record search charges (CSRs); 3) directory listings; and 4) various other miscellaneous  
21 charges. He outlines these charges on page 8 of his testimony, then discusses them in  
22 more detail on other pages of his testimony. In my direct testimony, I addressed these  
23 charges individually. Specifically, I testified that we perform certain tasks that are

1 necessary to complete both the orders for porting (LSRs) and for processing the customer  
2 record search requests (CSRs). In return, we assess charges for performing those tasks. I  
3 demonstrated that Charter has an outstanding balance due to CenturyTel for those charges  
4 of \$128,844.45. I also testified that there were other miscellaneous charges *and credits*  
5 on the billing statements that were not associated with the charges assessed for  
6 processing LSR and CSR orders. CenturyTel has already provided credit for those  
7 charges. They are not included in the \$128,844.45 we are seeking to recover from  
8 Charter.

9 **Q. So, items 3 and 4 on page 8 of Mr. Schremp's testimony are not at issue in this**  
10 **proceeding?**

11 A. No. They should not be an issue as we have already provided credits for those charges  
12 and we are not seeking recovery of them in this proceeding.

13 **Q. Can you describe for us why a CLEC requests customer record information from**  
14 **another carrier, what customer records they receive from those requests, and how**  
15 **they utilize the information?**

16 A. Yes, I would be happy to describe that process. CLECs request customer record  
17 information prior to porting a number from another carrier or, in some cases, prior to  
18 offering resale service to a customer. They receive in response to their request, the  
19 customer's name and address, how the customer is currently listed in the directory, and  
20 all the service features to which the customer is subscribed. The CLEC then utilizes this  
21 information to ensure that they provide those same services to the customer when the  
22 customer becomes the CLEC's own customer.

1 Q. At the time a carrier submits a customer record research request, does CenturyTel  
2 have any way of knowing how the CLEC will be using the information?

3 A. No. As I stated in my direct testimony, there is no requirement on the form to indicate  
4 why the carrier is requesting the information. So, we have no way of knowing how  
5 Charter or any other CLEC will use the data they are requesting.

6 Q. Is the process for handling CSR orders the same regardless of how the information  
7 will be used?

8 A. Yes. The process is the same and the amount of work involved is the same to process the  
9 order regardless of what the requesting carrier's intention is for obtaining the  
10 information.

11 Q. Please discuss Mr. Schremp's characterization of Charter's request for customer  
12 record information on page 10 of his testimony.

13 A. Mr. Schremp claims that Charter requests customer record information from CenturyTel  
14 "to ensure that Charter's subscriber information held in CenturyTel's databases would be  
15 properly listed in public telephone number directories produced by CenturyTel." I'm  
16 somewhat confused by this explanation. In some cases, CenturyTel does, in fact, retain  
17 directory listings for CLECs. In those cases, we provide a schedule of the listings just  
18 prior to the directory publishing date to the CLEC to enable them to review the listings  
19 and provide for corrections. However, Charter does not follow this practice with us.  
20 Instead, they maintain their own listings and provide a file of those listings directly to our  
21 directory publisher, with a copy to CenturyTel. The publisher then takes that file and  
22 loads it into the directory without re-keying any of the data. Charter does not utilize the

1 customer information we have stored in our database records for directory listings  
2 purposes.

3 **Q. So, CenturyTel does not supply its directory publisher Charter's customer listings**  
4 **utilizing information from CenturyTel's customer database records?**

5 A. No, we do not. The information provided to our directory publisher for Charter's listings  
6 is provided directly to them by Charter.

7 **Q. Is this process defined in the Interconnection Agreement?**

8 A. Yes. The language is found in the Additional Services Attachment to the Interconnection  
9 Agreement. Specifically, Section 4.2 of that Attachment states, "Charter shall provide to  
10 Verizon on a regularly scheduled basis . . . all Listing Information and the service address  
11 for each Charter customer whose service address location falls within the geographic area  
12 covered by the relevant Verizon directory."

13 **Q. So, does it make sense that Charter would be requesting customer record**  
14 **information to verify CenturyTel's database information for Charter's directory**  
15 **listings is correct?**

16 A. No, it does not. As I explained above, carriers request customer record information prior  
17 to sending us a port request or resale order. They use the request to validate services the  
18 customer has with CenturyTel and to find out how customer information is listed in the  
19 directory before placing the port or resale order. Mr. Schremp claims that "the purpose  
20 of records research was to ensure that Charter's subscriber information held in  
21 CenturyTel's databases would be properly listed in public telephone number directories  
22 produced by CenturyTel." At the time of a CSR submission, the customer is  
23 CenturyTel's customer, not Charter's. So, they could not be using this information to

1 validate Charter's subscribers' directory listings in CenturyTel's databases. They could  
2 perhaps utilize the information to know how to maintain the listings in their own systems  
3 once the number is ported to them.

4 **Q. For purpose of the charges to Charter for processing the CSR orders, does it matter**  
5 **what they are doing with the data?**

6 A. No. As stated previously, there is no requirement for Charter to tell us why they are  
7 requesting the information. The process for processing the order is the same regardless  
8 of why, so charges do apply to those requests.

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

10 A. Yes, it does.

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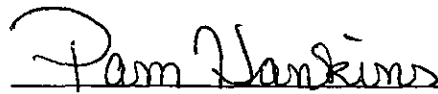
**Case No. LC-2008-0049**

STATE OF LOUISIANA )  
 ) SS.  
PARISH OF OUACHITA )

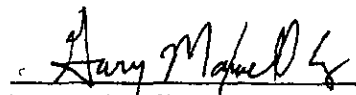
**AFFIDAVIT OF PAM HANKINS**

COMES NOW Pam Hankins, of lawful age, sound of mind and being first duly sworn, deposes and states:

1. My name is Pam Hankins. I am Manager, Corporate Carrier Relations for CenturyTel Service Group, LLC.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony in the above-referenced case.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge, information and belief.

  
PAM HANKINS

SUBSCRIBED AND SWORN to before me, a Notary Public, this 15<sup>th</sup> day of February, 2008.

  
Notary Public

My Commission Expires: *At death.*  
(SEAL)

**Gary Maxwell Cox  
Louisiana Bar Roll No. 27419  
Notary Public, Ouachita Parish, Louisiana  
My Commission is for Life**