

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


Southwestern Bell Telephone Company d/b/a AT&T	)	
Missouri's Petition for Compulsory Arbitration of	)	
Unresolved Issues for an Interconnection Agreement	)	Case No. IO-2011-0057
With Global Crossing Local Services, Inc. and Global	)	
Crossing Telemanagement Inc.	)	

**AT&T MISSOURI'S ENTRY OF DISCOVERY RESPONSES INTO THE RECORD**

AT&T Missouri,<sup>1</sup> pursuant to the Commission's October 5 Order Cancelling Hearing, Allowing Late Filing and Allowing Entry Into Record ("Order"),<sup>2</sup> hereby files, for entry into the record of this case, Attachments A and B hereto, which are the responses of Global Crossing Local Services, Inc. and Global Crossing Telemanagement Inc. to AT&T Missouri's September 28 Data Requests.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY  
D/B/A AT&T MISSOURI

BY 

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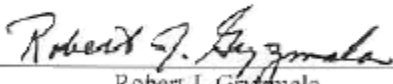
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<sup>1</sup> Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

<sup>2</sup> Based upon agreement of the parties, the Commission ordered that "AT&T Missouri may enter any discovery response from Global Crossing Local Services, Inc. or Global Crossing Telemanagement Inc., or both, into the record by filing such responses no later than October 8, 2010." Order, at p. 2.

## **CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following by e-mail on October 8, 2010.

  
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Crossing Telemanagement Inc.	)	

**RESPONSES TO AT&T MISSOURI'S DATA REQUESTS**

COME NOW Global Crossing Local Services, Inc. and Global Crossing Telemanagement, Inc. (collectively, "Global Crossing"), and pursuant to 4 CSR 240-2.090 and the Missouri Public Service Commission's September 16, 2010 Order Setting Procedural Schedule, hereby respond to Southwestern Bell Telephone Company's ("ATT") data requests as follows:

1. Please identify all Global Crossing entities, affiliates, and subsidiaries that provide retail VoIP services.

ANSWER: Global Crossing Local Services, Inc.

2. Please state whether Global Crossing Local Services, Inc. provides retail VoIP services.

ANSWER: Global Crossing Local Services, Inc. provides retail VoIP services.

3. If Global Crossing Local Services, Inc. provides retail VoIP services, please describe how Global Crossing Local Services, Inc. intends to have delivered to AT&T Missouri the portion of such retail VoIP services traffic that is destined to end users of AT&T Missouri, including whether Global Crossing Local Services, Inc. intends to deliver that portion of its retail VoIP services traffic directly to AT&T Missouri for termination.

ANSWER: With respect to its retail services, Global Crossing Local Services, Inc. will originate a call in the LATA of origination from the end user in Internet Protocol format, hand the call off to its interexchange affiliate Global Crossing Telecommunications, Inc., which will hand the call back off to Global Crossing Local Services, Inc. in the LATA of termination. Global Crossing Local Services, Inc. will then convert the call to TDM format and hand off to AT&T Missouri for completion to the called party.

With respect to wholesale services, the VoIP provider will originate a call in IP format, hand it off to Global Crossing Telecommunications, Inc. for transport to the LATA of termination. Global Crossing Telecommunications, Inc. will then hand the call off to Global Crossing Local Services, Inc., which will then convert the call to TDNM format and hand off to AT&T Missouri for completion to the called party.

4. Please state whether Global Crossing Telemanagement, Inc. provides retail VoIP services.

ANSWER: Global Crossing Telemanagement, Inc. does not provide retail VoIP services.

5. If Global Crossing Telemanagement, Inc. provides retail VoIP services, please describe how Global Crossing Telemanagement, Inc. intends to have delivered to AT&T Missouri the portion of such retail VoIP services traffic that is destined to end users of AT&T Missouri, including whether Global Crossing Telemanagement, Inc. intends to deliver that portion of its retail VoIP services traffic directly to AT&T Missouri for termination.

ANSWER: Global Crossing Telemanagement, Inc. does not provide retail VoIP services.

6. Please identify all affiliates for which Global Crossing Local Services, Inc. transports VoIP traffic originating from the retail VoIP service customers of the affiliate.

ANSWER: See Answer to question 3 above.

7. Please identify all affiliates for which Global Crossing Telemanagement, Inc. transports VoIP traffic originating from the retail VoIP service customers of the affiliate.

ANSWER: Global Crossing Telemanagement, Inc. does not provide retail VoIP services.

8. If Global Crossing Local Services, Inc. provides retail VoIP services, please state whether it has the ability to identify the geographic location of its retail VoIP services customer when the customer places a call. If it does, describe the manner in which Global Crossing Local Service, Inc. accomplishes that identification.

ANSWER: Global Crossing Local Services, Inc. has the ability to identify the geographic location of its retail VoIP services customer when the customer places a call. It does so by account and originating ANI.

9. If Global Crossing Telemanagement, Inc. provides retail VoIP services, please state whether it has the ability to identify the geographic location of its retail VoIP services customer when the customer places a call. If it does, describe the manner in which Global Crossing Telemanagement, Inc. accomplishes that identification.

ANSWER: Global Crossing Telemanagement, Inc. does not provide retail VoIP services.

10. For each instance since January 1, 2007, in which Global Crossing placed an order with AT&T Missouri for dedicated transport dark fiber, please state (i) the date on which Global Crossing placed the order; (ii) the number of strands of dark fiber ordered; (iii) whether the order was fulfilled in whole or in part; and (iv) if the order was not fulfilled in whole, the reasons therefor. Please produce all documents that relate to said order or to the fulfillment or non-fulfillment of said order.

ANSWER: There are no such instances.

11. For each instance since January 1, 2007, in which Global Crossing placed an order with an AT&T ILEC other than AT&T Missouri for dedicated transport dark fiber, please identify the AT&T ILEC and state (i) the date on which Global Crossing placed the order; (ii) the number of strands of dark fiber ordered; (iii) whether the order was fulfilled in whole or in part; and (iv) if the order was not fulfilled in whole, the reasons therefor. Please produce all documents that relate to said order or to the fulfillment or non-fulfillment of said order.

ANSWER: There are no such instances.

Respectfully submitted,

/s/ Lisa A. Gilbreath

Mark P. Johnson #30740

Lisa Gilbreath #62771

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***Of Counsel:***

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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 6th day of October, 2010, served a true and final copy of the foregoing by electronic transmission upon the following, listed below, in accordance with Commission rules.

Leo J. Bub  
Robert J. Gryzmala  
Attorneys for Southwestern Bell Telephone Company  
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leo.bub@att.com  
robert.gryzmala@att.com

/s/ Lisa A. Gilbreath  
Lisa A. Gilbreath

**BEFORE THE PUBLIC SERVICE COMMISSION  
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**STATE OF GEORGIA**                     )  
  )       ss.  
**COUNTY OF DAWSON**                 )

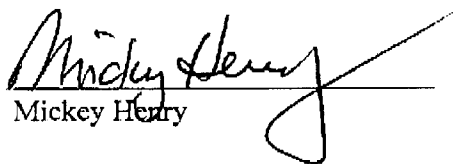
**AFFIDAVIT OF MICKEY HENRY**

Comes now Mickey Henry, being of lawful age and duly sworn, and says and affirms the following:

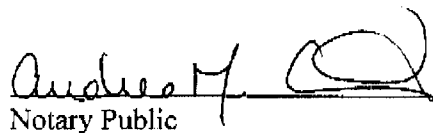
1. I am Director of Carrier Relations for Global Crossing.

2. I have read the foregoing responses and affirm that the statements contained therein are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

  
Mickey Henry

Subscribed and sworn to before me this 6th day of October, 2010.

  
Notary Public

My commission expires: 2/8/11

21450276

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Crossing Telemanagement Inc.	)	

**CLARIFICATION OF RESPONSE TO AT&T MISSOURI'S DATA REQUESTS**

COME NOW Global Crossing Local Services, Inc. and Global Crossing Telemanagement, Inc. (collectively, "Global Crossing"), and pursuant to 4 CSR 240-2.090 and the Missouri Public Service Commission's September 16, 2010 Order Setting Procedural Schedule, hereby clarifies its response to Southwestern Bell Telephone Company's ("ATT") data requests number 7 at the request of ATT.

7. Please identify all affiliates for which Global Crossing Telemanagement, Inc. transports VoIP traffic originating from the retail VoIP service customers of the affiliate.

ANSWER: Global Crossing Telemanagement, Inc. does not transport VoIP traffic and therefore has no such affiliates.

Respectfully submitted,

/s/ Lisa A. Gilbreath  
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 Lisa Gilbreath #62771  
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**Attorneys for Global Crossing Local Services, Inc. and  
Global Crossing Telemanagement, Inc.**



***Of Counsel:***

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ted.price@globalcrossing.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 7th day of October, 2010, served a true and final copy of the foregoing by electronic transmission upon the following, listed below, in accordance with Commission rules.

Leo J. Bub  
Robert J. Gryzmala  
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/s/ Lisa A. Gilbreath  
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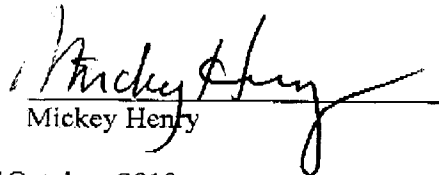
**STATE OF GEORGIA**                     )  
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**AFFIDAVIT OF MICKEY HENRY**

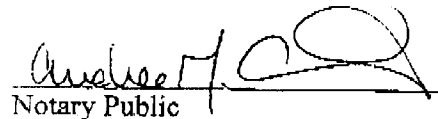
Comes now Mickey Henry, being of lawful age and duly sworn, and says and affirms the following:

1. I am Director of Carrier Relations for Global Crossing.
2. I have read the foregoing response and affirm that the statements contained therein are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

  
Mickey Henry

Subscribed and sworn to before me this 7th day of October, 2010.

  
Notary Public

My commission expires: 2/8/11