Exh. No. _____
Issue: InterMTA Traffic Volumes
Witness: William Biere
Type of Exhibit: Direct Testimony
Sponsoring Party: Complainants MITG
Case No. Tc-2002-57
Date: January 9, 2004

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

Northeast Missouri Rural Telephone Company and Modern Telecommunications Company,	)	
Petitioners,	)	
vs.	)	**Case No. TC-2002-57**
Southwestern Bell Telephone Company, Southwestern Bell Wireless (Cingular), Voicestream Wireless (Western Wireless) Aerial Communications, Inc., CMT Partners (Verizon Wireless), Sprint Spectrum LP, United States Cellular, Ameritech Mobile Communications, Inc.	)	
Respondents.	)	

Direct Testimony

Of

William Biere

Re Traffic Proportions

On behalf of

Chariton Valley Telephone Corporation

January 9, 2004

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Issue: InterMTA Traffic Volumes
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AFFIDAVIT OF WILLIAM BIERE

STATE OF MISSOURI)
) ss.
COUNTY OF Macon)

William Biere, of lawful age, on my oath states, that I have participated in the preparation of the foregoing direct testimony in question and answer form, consisting of _____ pages, to be presented in this case; that the answers in the foregoing testimony were given by me; that I have knowledge of the matters set forth in such answers; and that such matters are true to the best of my knowledge and belief.

William Biere

Subscribed and sworn to before me this 5th day of January, 2004.

Audra E. Linebaugh
Notary Public

My Commission Expires
May 27, 2006

AUDRA E. LINEBAUGH
Notary Public - Notary Seal
STATE OF MISSOURI
Carrollton County
My Commission Expires: May 27, 2006

Q. Please state your name, capacity, and business address?

A. William Biere. I am General Manager of Chariton Valley Telephone Corporation, 109 Butler, Macon, Missouri, 63552.

Q. On whose behalf are you testifying?

A. Petitioner Chariton Valley Telephone Corporation.

Q. Are you the same William Biere that testified in the prior hearing in this case?

A. Yes.

Q. What is the purpose of this testimony?

A. This testimony will set forth the information in Chariton Valley's possession with respect to the proportions of interMTA and intraMTA traffic terminating to Chariton Valley from each of the wireless company Respondents against whom Chariton Valley's complaint remains pending.

On behalf of all Petitioners I will also testify as to what use the Commission can make of interMTA and intraMTA traffic proportions when switched access tariffs are the only compensation vehicle available. I will refer to some history preceding this case, and will explain why this case is different than the case the Commission recently heard involving the Small Telephone Company Group's complaint against the T-Mobile entities.

Q. Please set forth the terms of the Commission Order giving rise to this phase of this proceeding.

A. The Commission's June 3, 2003 Order Reopening the Record directed that evidence be adduced as to the proportion of the wireless originating traffic terminating to the Petitioner companies that is interMTA and the proportion that is intraMTA.

Q. Are you generally aware that the Commission has recently directed and conducted hearings and closing arguments as to interMTA and intraMTA traffic proportions in a complaint case brought by the Small Telephone Company Group against the T-Mobile entities and Western Wireless?

A. Yes, counsel has kept me aware.

Q. Are there any differences in this case and the STCG case?

A. Yes. As I understand, the STCG complaint was initiated solely for traffic the wireless carriers did not pay for under the terms of the STCG companies' Wireless Termination Service Tariff. In this MITG case, most of the traffic at issue terminated before there was any Wireless Termination Service Tariff in place.

Q. Is there some traffic at issue here that was terminated when a Wireless Termination Service Tariff was in place?

A. Yes, Alma, Choctaw, and MoKan had Wireless Termination Service Tariffs approved in February 2001. Those tariffs were effective for the traffic at issue to those companies, from February 2001 to December 2001. However, neither Chariton Valley, Northeast, nor Mid-Missouri had a wireless termination service tariff in effect during the four years of traffic at issue here.

Q. In the complaints it was alleged that the terminating wireless traffic compensation issues were ongoing and would continue in the future. Is it true that since the prior hearing the wireless traffic has continued to terminate?

A. Not only has in continued to terminate, generally the volume of this traffic has continued to increase.

Q. With respect to the traffic volumes at issue when there was no Wireless Termination Service Tariff in effect, do you understand what use the Commission can make of the evidence of proportions of interMTA and intraMTA traffic?

A. No.

Q. Why not?

A. Prior to the period now at issue, SWBT paid the MITG companies pursuant to their access tariffs for terminating wireless traffic, regardless of whether the traffic was interMTA or intraMTA in jurisdiction.

In 1997 The Commission entered an Order which was an attempt to change this. That Order allowed SWBT to change to a transiting function, but the Order was premised upon the Commission's understanding and expectation that future traffic terminating to the MITG Companies would be terminated under the auspices of interconnection agreements setting forth the terms of reciprocal compensation for local wireless traffic.

The wireless carriers and SWBT failed to comply with this Order. Wireless traffic continued to terminate to the MITG companies without there having been consummated any interconnection agreements.

The MITG traffic in evidence terminated between February 1998 and December 2001. Chariton Valley additionally submitted evidence of traffic volumes through February 2002. For Mid-Missouri Telephone Co., Northeast Missouri Telephone Co. and Chariton Valley all of the traffic at issue terminated when the only compensation mechanism applicable was these companies' access tariffs. Theses access tariffs have no provisions differentiating traffic based on whether it is interMTA or intraMTA in jurisdiction.

If the Commission were to rule that the Mid-Missouri, Northeast and Chariton Valley companies were not entitled to compensation for intraMTA traffic during this period, such a ruling could mean these companies may not be able to recover compensation even though all parties agree they are entitled to compensation.

Q. What aspects of the Commission December 23, 1997 Order in SWBT's Wireless Interconnection Tariff case. TT-97-524 resulted in this situation?

A. In my opinion, the Commission's Order was flawed because the primary liability, secondary liability, and indemnity provisions failed to provide the "maximum" incentive to negotiate reciprocal compensation that the Commission stated it wanted to provide.

The essential flaw was that the Commission stated that, if the wireless carriers failed to consummate reciprocal compensation agreements, they would be primarily liable *for* reciprocal compensation. With due respect for the Commission, I believe that making wireless carriers liable for reciprocal compensation if they failed to consummate reciprocal compensation agreements failed to provide any incentive. Why would wireless carriers be incented to expend the time, trouble, and expense of negotiating an

agreement, when the worst it would risk for not doing so would be to pay the reciprocal compensation it should have negotiated in the first place?

Q. Has the Commission indicated it failed to provide the correct incentive?

A. I believe that in its February 8, 2001 Order in TT-2001-139, the Commission agreed and recognized that it had failed to provide the necessary incentive:

> "Because the wireless-originated traffic continues to be terminated to subscribers of the small LECs at no extra cost to the CMRS carriers, there is not incentive for those carriers to enter into agreements wit the small LECs. Since the implementation of SWBT's revised tariff in February, 1998, not a single such termination compensation agreement has been made between a CMRS carrier and a small LEC. In those instances in which a small LEC has presented a bill to a CMRS carrier, the bill has generally not been paid."

Q. What has been the result of the failure to consummate interconnection agreements?

A. The MITG companies have been left with no effective recourse, other than this complaint proceeding.

Under the Act the ability to consummate reciprocal compensation lies with the wireless carriers, not with the MITG companies. The wireless companies did not effectuate reciprocal compensation agreements prior to terminating this traffic. The MITG companies had no reciprocal compensation rate to bill the wireless carriers for their "primary" liability, or to bill SWBT for its "secondary liability". The only lawful rate we had to apply was our exchange access rate.

Q. Has the Commission attempted to rectify this situation?

A. Yes. In its February 8, 2001 Order in TT-2001-139,[1] the Commission approved Wireless Termination Service Tariffs in order to get the small companies paid, and to provide real incentive for reciprocal compensation agreements.

Q. How did the Commission justify the application of Wireless Termination Service Tariffs to wireless traffic?

A. In its Order approving Wireless Termination Service Tariffs, the Commission recognized those tariffs were "in the nature of exchange access". The Commission decided that state tariffs were not subject to reciprocal compensation rules, and if the wireless carriers did not like them they could exercise their rights under the 1996 Act and consummate agreements containing reciprocal compensation provisions.

Q. Do you see any difference in applying access tariffs versus Wireless Termination Tariffs to wireless traffic delivered in the absence of an interconnection agreement?

A. No. The Commission's rationale for approving the Wireless Termination Tariffs seems equally true of access tariffs. The commission has found that Wireless Termination Service Tariffs are in the nature of access tariffs, and that the 1996 Act does not require Wireless Termination Service Tariffs to contain reciprocal compensation provisions. If the Act does not require Wireless Termination Tariffs to contain

[1] *In the Matter of Mark Twain Rural Telephone Company's Proposed Tariff to Introduce Its Wireless Termination Service*, Case No. TT-2001-139 (*Report & Order*, issued February 8, 2001).

reciprocal compensation components, it would be inconsistent to require access tariffs to contain such components.

If the Act does not prohibit the application of Wireless Termination Service Tariffs to this traffic, the Act did not prohibit the application of access tariffs to this traffic. The Commission's Order in TT-2001-139 recognized its own conclusion in the United Complaint case that terminating exchange access charges can be applied to the termination of wireless-originated traffic.[2]

If the payment of Wireless Termination Tariff rates was supposed to motivate wireless carriers to finally come to the bargaining table and consummate reciprocal compensation agreements, then the application of the higher access rates would have provided even stronger incentive.

Q. Would the application of access tariffs to this traffic be unfair to Southwestern Bell Telephone?

A. No. SWBT has protected itself by making the wireless carriers responsible to indemnify SWBT from any charges rendered by the MITG companies. As SWBT has taken no steps to see that reciprocal compensation was in place prior to transiting the wireless traffic, SWBT is partially responsible for this situation.

Q. Do you see any problems with applying the access tariffs directly to the wireless carriers?

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[2] *In the Matter of United Telephone Company*, Case No. TC-96-112 (*Report & Order*, iss'd April 11, 1997). The Commission reaffirmed this position in two further decisions issued in 1999. *In the Matter of Chariton Valley Telephone Corporation*, Case No. TC-98-251 (*Report & Order*, iss'd June 10, 1999) (Crumpton, C., concurring & Murray, C., dissenting) and *In the Matter of Mid-Missouri Telephone Company*, Case No. TC-98-340 (*Report & Order*, iss'd June 10, 1999) (Crumpton, C., concurring & Murray, C., dissenting).

A. Yes. Exchange access service is a service the MITG companies provide to interexchange carriers pursuant to the access tariff. Prior to being billed for access under this tariff, traditionally carriers have ordered access and met the terms of the access tariff. The wireless carriers have not done that, only SWBT has.

Q. Please set forth the wireless carrier traffic for whom Chariton Valley's Complaint has not been resolved?

A. The wireless carriers for whose traffic Chariton Valley's Complaint has not been resolved are Cingular, US Cellular, T-Mobile, Western Wireless, and Sprint PCS. There are other wireless carriers sending traffic for whom Chariton Valley bills but is not paid. However, this occurred after the filing of the complaint herein, and they were not named as Respondents by Chariton Valley. They will have to be addressed later. Hopefully the result in this case will be useful in that regard.

Q. Would you restate the traffic volumes for this four year period for which evidence was adduced at the prior hearing?

A. Yes. CTUSR reports provided by SWBT to Chariton Valley reflect the following amounts of uncompensated traffic originated by the following Respondent Wireless Carriers:

Cingular:	671,670
US Cellular:	2,783,966
T-Mobile:	97,520
Western W:	158,815
Sprint PCS:	23,966

Total 3,735,937

Q. Can you quantify the amount of money potentially at stake for Chariton Valley?

A. Yes, but I would have to utilize some rate in making this quantification. At Chariton Valley's Missouri terminating access rates these uncompensated minutes represent approximately $294,000.

Q. Has the FCC provided direction with respect to how interMTA and intraMTA traffic is to be determined?

A. Yes. In its August 8, 1996 Interconnection Order, the FCC provided guidance to the industry in determining how interMTA traffic could be determined for purposes of reciprocal compensation. In paragraph 1044 of that Order, the FCC set forth 3 methods for determining interMTA and intraMTA traffic proportions, which I will refer to as the "first method", "second method", and "third method":

First Method: calculated or extrapolated factors from traffic studies and samples are included in agreements as to the proportions of interMTA and intraMTA traffic, obviating the need to record or assume traffic origination points;

Second Method: location of the initial cell cite when a call begins is recorded and used to identify the call origination point to determine if the call was interMTA or intraMTA;

Third Method: the point of interconnection between the wireless carrier and LEC is utilized as the call origination point to determine if the call was interMTA or intraMTA.

Q. Do you believe the FCC contemplated that, whatever method was utilized, it would be contained in an approved agreement?

A. Yes, I believe the FCC was providing guidance to the industry as to what type of methodology was expected, acceptable, or useful for negotiating and approving the reciprocal compensation agreement, leaving it to the parties to select the method that would best suit them.

Q. Does Chariton Valley have any approved agreements with Respondent wireless carriers containing any of these three methods?

A. No. The traffic at issue was received by Chariton Valley after February 5, 1998, in the absence of any such agreement.

Q. If there had been agreements, do you believe this case would be necessary?

A. No. If agreements had been reached, in all likelihood they would have contained one of the three methods the FCC identified.

Q. As there are no such agreements, whose responsibility do you believe it should have been to record and retain the necessary call information from which the Second Method interMTA and intraMTA traffic proportions could be determined?

A. SWBT and the wireless carriers knew they were sending this traffic to Chariton Valley. They knew Chariton Valley would be entitled to compensation for this traffic. They knew it was terminating without an interconnection agreement. They knew there

was no agreement with Chariton Valley as to how to determine interMTA and intraMTA traffic proportions. Given this knowledge, it seems to me that they should have known there could be a compensation dispute. Given this, they should have made arrangements to preserve information that would distinguish interMTA and intraMTA traffic volumes.

Q. Have they?

A. Apparently not. In their responses to data requests they indicate they did not preserve this information.

Q. Can you explain the Major Trading Areas, or MTAs?

A. Yes. MTA is an acronym for Major Trading Area. The FCC established the MTA as the boundary for "local" reciprocal compensation, assuming an Interconnection Agreement implementing reciprocal compensation between an ILEC and CMRS provider was obtained.

Q. Could you describe how the MTA boundaries impact Chariton Valley?

A. Yes. Schedule 1 is a map of Missouri, with MTA boundaries depicted. Chariton Valley has eighteen exchanges serving about 8620 access lines. All of these exchanges are within the Kansas City LATA 524. All of the wireless traffic delivered by SWBT to Chariton Valley is delivered over SWBT's facilities within the Kansas City LATA. However, only two counties in which Chariton Valley serves lie within the Kansas City MTA. The rest of Chariton Valley's service area lies within the St. Louis MTA.

Thirteen Chariton Valley exchanges lie entirely within the St. Louis MTA. They are Atlanta, Bevier, Bynumville, Callao, Clifton Hill, Ethel, Excello, Forest Green,

Huntsville, Jacksonville, New Cambria, Prairie Hill, and Salisbury. These exchanges contain 7017 of Chariton Valley's 8620 access lines.

Two Chariton Valley exchanges lie entirely within the Kansas City MTA. They are Bosworth and DeWitt. These exchanges contain 473 access lines.

The three remaining exchanges, Bucklin, Hale, and New Boston, lie partially in the St. Louis MTA and partially in the Kansas City MTA. Of the 1130 access lines contained in these three exchanges, 944 lie in the Kansas City MTA, and 186 lie in the St. Louis MTA.

So in total Chariton Valley has 7203 lines in the St. Louis MTA, and 1417 in the Kansas City MTA.

Q. Have the CTUSRs sent you by SWBT since February 5, 1998 contained sufficient information to allow you to determine interMTA and intraMTA traffic proportions utilizing the Second Method?

A. No. The CTUSR reports to Chariton Valley which wireless carriers' traffic terminates to the different Chariton Valley exchanges. The CTUSR does not inform Chariton Valley of where the calls originate. Therefore the CTUSR does not provide sufficient information for Chariton Valley billings to differentiate interMTA from intraMTA traffic.

Q. Did SWBT tell the Commission the CTUSR would be adequate for billing purposes?

A. Yes. In TT-97-524, SWBT told the Commission in a reply brief that the CTUSR "should provide the ILECs with sufficient information to render a bill."[3]

Q. What position has this left you in?

A. In order to comply with the Order Reopening the Record, Chariton Valley has had to attempt to develop information as to the proportions of interMTA and intraMTA traffic from its own records.

Q. Have you developed information as to the proportions of interMTA and intraMTA traffic from other sources?

A. Yes. We have utilized our best efforts at performing the Second Method for Cingular, US Cellular, T-Mobile, Western Wireless, and Sprint PCS.

Q. Were you able to perform the First Method?

A. No. The first method requires an exchange of traffic information containing call detail as to origination location from which a factor can be developed. Although we requested it from the wireless carriers, they did not have, or did not provide, this information.

Q. Were you able to do the Third Method?

A. We were not able to confidently do the Third Method, so we decided not to. If a wireless carrier only had one known interconnection point with SWBT, we could have used that point as the origination point for all calls, and we could have used the information provided by the CTUSRs as the termination point for all calls. This would have allowed us to use the Third Method to develop interMTA and intraMTA

[3] Reply brief of Southwestern Bell Telephone Company. Case No. TT-97-524. pp. 12-13.

proportions. However, as we don't specifically know that each wireless carrier has only one interconnection point, we decided not to use this method.

Q. Were you able to do the Second Method?

A. This Method was the only method left. Although we did not have originating cell tower location information for each call, we do record the calling party's telephone number, including the NPA/NXX. We used the location of that NPA/NXX as a surrogate for the caller's location when the call was made. We also had the terminating exchange, and knew the terminating MTA of the calls.

Q. What proportions of interMTA and intraMTA traffic originated by Cingular, US Cellular, T-Mobile, Western Wireless, and Sprint PCS does your Second Method analysis show?

A. For Cingular this method showed that 41% of Cingular traffic originated and terminated in different MTAs. In other words, 41% of Cingular traffic was interMTA, and 59% was intraMTA.

For T-Mobile and Western Wireless, this method showed that 73% of T-Mobile traffic originated and terminated in different MTAs. In other words, 73% of T-Mobile traffic was interMTA, and 27% was intraMTA.

For Sprint PCS this method showed that 35% of Sprint PCS traffic originated and terminated in different MTAs. In other words, 35% of Sprint PCS traffic was interMTA, and 65% was intraMTA.

Q. Please tell the Commission how you developed this information?

A. Joe Knip does a good job of describing the process in his testimony. The Chariton Valley traffic period in evidence is between February 5, 1998 and February 28, 2002. We initially selected a quarter from this period to analyze, the months of October, November, and December, 2001. However, Chariton Valley had switched billing vendors, and encountered difficulties processing the October data, so Chariton Valley's analysis is based upon November and December, 2001 traffic.

All of the traffic at issue was being delivered by SWBT to the intraLATA toll network. We record the number of the caller originating the call, which gives us their NPA/NXX. We secured a list of NPA/NXXs assigned to Cingular, US Cellular, T-Mobile, Western Wireless, and Sprint PCS, and screened the traffic delivered on the SWBT trunks to identify traffic originated by each of those wireless carriers.

For each call originated by the respective wireless carrier, we identified the geographical area in which that NPA/NXX was assigned. We then assigned the originating MTA for each call as that MTA including the area to which the NPA/NXX was assigned. For each call we also had the location of the Chariton Valley exchange the call terminated to. This provided the terminating MTA.

All calls terminating to the 13 exchanges entirely within the St. Louis MTA were known to terminate in the St. Louis MTA. All calls terminating to the 2 exchanges entirely within the Kansas City MTA were known to terminate in the Kansas City MTA.

For the three exchanges located both in the Kansas City and St. Louis MTAs, we assumed that all calls terminated to the Kansas City MTA. Given that only 186 of these lines were in the St. Louis MTA, we made this assumption. In other words we

knowingly mis-assigned 2 percent of total access lines. The reason we did this was to avoid the time and effort required to individually translate two months of calls between 1130 different numbers.

With both an originating MTA and a terminating MTA thus identified for each call, we calculated the proportions of traffic volumes that were interMTA and intraMTA.

Q. Can you produce the results of these analyses in more detail?

A. Yes. The analysis for Cingular is attached hereto as Schedule 2 HC. The analysis for T-Mobile and Western Wireless is attached hereto as Schedule 3 HC. The analysis for Sprint PCS is attached hereto as Schedule 4 HC.

Q. Please describe any potential for inaccuracies that exist with respect to this surrogate Second Methodology?

A. Our information does not allow us to know the actual location of the mobile caller when the call was made. Our study assumed that the call was made from the MTA which included the "home area" of the caller represented by his or her NPA/NXX. Intuitively we believed it safe to conclude that most wireless calls are made from the caller's home MTA.

We know that some wireless calls will be made while the customer is not in his home MTA. Therefore there are two types of errors that will be contained in our Second Method. First, it may identify an intraMTA call that was actually an interMTA call. Second, and conversely, it may identify an interMTA call that was actually an intraMTA call. These errors would tend to be offsetting, but I can't quantify the precise potential for each type of error.

Q. Were there any anomalies with respect to any of this traffic that require further explanation?

A. Yes. Chariton Valley and Northeast discovered that almost all US Cellular traffic did not have the true phone number of the US Cellular customer placing the call. Instead it had a 660-263-0073 number. This is a SWBT Moberly exchange number. When we attempted to call this number we discovered it was not a working number.

We then sent data requests to SWBT and US Cellular to attempt to find the reason for this. Based upon the answers to those data requests, it appears that SWBT believes US Cellular has a Type 1 interconnection at the SWBT Moberly end office that could serve up to 21,000 US Cellular customers in the Moberly area. SWBT apparently believes the calls originate from a wireless carrier trunk that uses multi-frequency signaling, not SS7 signaling. SWBT assigned the 660-263-0073 number as a trunk group screening number.

But it appears US Cellular believes it has both a type 1 end office interconnection combined in some fashion with a Type 2 tandem connection and trunks between SWBT's Moberly and Kirksville access tandems. US Cellular is apparently using this combination of facilities to route its traffic from many different service areas in which US Cellular may be serving up to 540,000 potential customer numbers. US Cellular states that the 660-263-0073 number is assigned because it is the "trunk group ANI".

Q. What concerns did these data responses cause?

A. We cannot tell how this traffic is routed before it is delivered. The explanation of why the 660-263-0073 number is assigned does not make sense. Multi-frequency trunks

can and do pass ANI. ANI should provide the originating caller's number. Also we have checked and SS7 has passed the caller's correct number even when the fake ANI is passed to our toll recording systems.

It further appears from US Cellular's response that some proportion of this traffic is carried by interexchange carriers other than SWBT, which would make this traffic access traffic regardless of whether it was interMTA or intraMTA in jurisdiction.

The bottom line is we are deprived of the caller's number, which precludes us from utilizing the Second Method to present evidence in compliance with the Commission's Order reopening the record.

Q. What are you asking the Commission to do with respect to US Cellular traffic?

A. I ask that the Commission simply presume that all US Cellular traffic is interMTA traffic, unless and until US Cellular provides call detail showing sufficient information to establish that a call or calls is not interMTA in jurisdiction.

Q. Why did you present a single factor for both the T-Mobile entities and Western Wireless?

A. Apparently Aerial, VoiceStream, Western Wireless, and T-Mobile have at times in the past been affiliates, and at times been separate entities. Apparently they all have used the same interconnection with SWBT. All Chariton Valley knows is what entity SWBT has reported as being responsible for originating the traffic. In recent proceedings in this case and in the STCG v T-Mobile Complaint, we have learned more about what carrier truly originated the traffic, as opposed to whom SWBT reported had originated the

traffic. We have also learned that the T-Mobile and Western Wireless entities disagree with SWBT as to which carrier is responsible. See the Attached Traffic Breakdown, Schedule 5. The "Responsible Wireless Co." column reflects the identity of the responsible carrier based upon new information from the T-Mobile and Western Wireless entities. The "CTUSR Reported Wireless Co." reflects the identity of the responsible carrier reported by SWBT.

Assuming as correct the identification of the entity that T-Mobile and Western Wireless now say is the responsible carrier, instead of the carrier the SWBT CTUSR reported as being responsible, Chariton Valley never received Western Wireless originated traffic, and should not have filed complaint against Western Wireless.

Q. Does this situation with the T-Mobile and Western Wireless entities raise other concerns of yours?

A. Yes. It demonstrates once again the frailty of "originating responsibility". Not only does the CTUSR fail to provide adequate information to jurisdictionalize traffic, it does not reliably identify the responsible wireless carrier. That is not acceptable. It is not commercially reasonable for Chariton Valley to have to conduct years of litigation to ascertain the financially responsible carrier. The billing records should do that, which is the convention the industry has relied upon for years. There is no indication that SWBT has any difficulty knowing which carrier to bill.

Apparently SWBT has allowed the traffic of multiple wireless carriers to traverse the same interconnection point. It could be that SWBT allows this because it bills the delivering carrier as the financially responsible carrier. SWBT may not have cared that

T-Mobile paid for Western Wireless originated traffic, and T-Mobile and Western settled up between themselves. That may be the business relationship SWBT has chosen at its interconnection point. But there is no justification for forcing Chariton Valley to bill Western Wireless for traffic SWBT bills T-Mobile for. Chariton Valley should have as much choice in business relationships as SWBT has.

Q. Please set forth the intraMTA and intraMTA traffic proportions you are asking the Commission to find?

A. Chariton Valley asks the Commission to find that the following proportion of interMTA traffic originated by the following Respondent Carriers were terminated to Chariton Valley between February 5, 1998 and February 28, 2002:

Wireless Carrier	Proportion InterMTA Traffic	Proportion IntraMTA Traffic
Cingular	41%	59%
US Cellular*	100%	0%
T-Mobile/WW	73%	27%
Sprint PCS	35%	65%

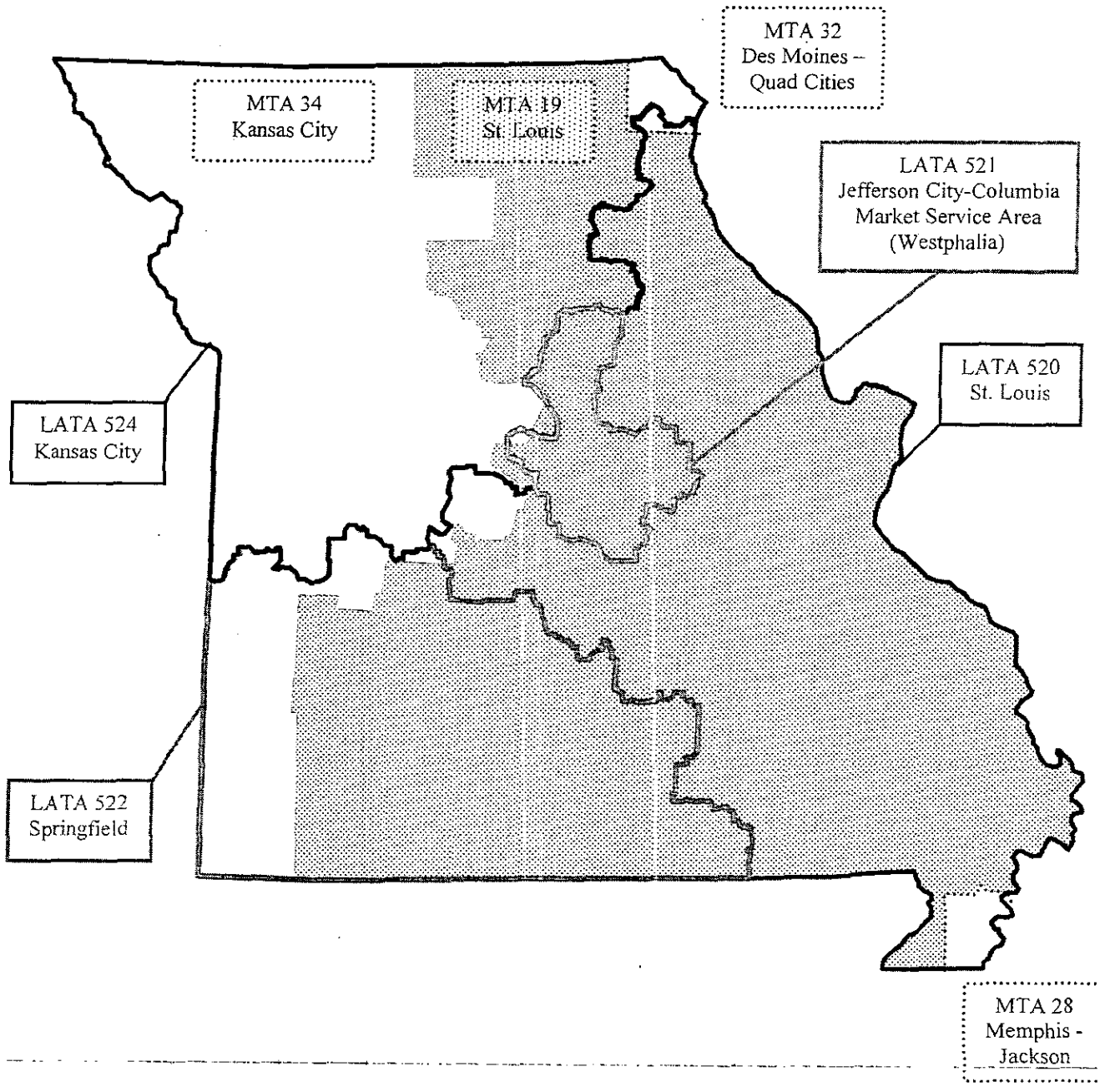
*unless and until US Celluar produces call detail demonstrating a different percentage.

Q. Does this conclude your direct testimony?

A. Yes.

SCHEDULE 1
MAP
Missouri Telephone LATA Boundaries with CMRS MTAs

Missouri Telephone LATA Boundaries
with CMRS MTAs



Schedule 1

SCHEDULE 2

HIGHLY CONFIDENTIAL

(Schedule is attached under separate cover)

SCHEDULE 3

HIGHLY CONFIDENTIAL

(Schedule is attached under separate cover)

SCHEDULE 4

HIGHLY CONFIDENTIAL

(Schedule is attached under separate cover)

SCHEDULE 5

T-Mobile/VoiceStream/Aerial/Western Wireless Traffic Breakdown

T-Mobile/VoiceStream/Aerial/Western Wireless Traffic Breakdown

MITG Company CTUSR Data	ACNA Code	Responsible Wireless Co.	CTUSR Reported Wireless Co.	Dates	Traffic Totals
Mid-Mo	ABW	American Portable Tel.	American Portable Tel.	7/97-4/98	817
		Aerial Communications	Aerial Communications	4/98-5/00	43,588
		VoiceStream	Aerial Communications	5/00-11/00	24,267
	WCG	VoiceStream	Western Wireless	11/00-9/01	126,212
		VoiceStream	VoiceStream	9/01-8/02	191,307
		T-Mobile	VoiceStream	9/02-now	331,772
Chariton Valley	ABW	Aerial Communications	Aerial Communications	4/98-5/00	67,390
		VoiceStream	Aerial Communications	5/00-11/00	29,607
	WCG	VoiceStream	Western Wireless	11/00-9/01	117,242
		VoiceStream	VoiceStream	9/01-8/02	182,342
		T-Mobile	VoiceStream	8/02-now	269,047
Alma	ABW	American Portable Tel.	American Portable Tel.	11/97-4/98	858
		Aerial Communications	Aerial Communications	4/98-5/00	31,788
		VoiceStream	Aerial Communications	5/00-11/00	12,473
	WCG	VoiceStream	Western Wireless	11/00-9/01	52,352
		VoiceStream	VoiceStream	9/01-8/02	89,910
		T-Mobile	VoiceStream	8/02-now	133,623
Choctaw	WCG	VoiceStream	Western Wireless	11/01-4/02	225
		VoiceStream	VoiceStream	4/02-8/02	4231
		T-Mobile	VoiceStream	8/02-now	13,009

MITG Company CTUSR Data	ACNA Code	Responsible Wireless Co.	CTUSR Reported Wireless Co.	Dates	Traffic Totals
MoKan	ABW	American Portable Tel.	American Portable Tel.	2/98-4/98	5,213
		Aerial Communications	Aerial Communications	4/98-5/00	117,922
		VoiceStream	Aerial Communications	5/00-11/00	37,036
	WCG	VoiceStream	Western Wireless	11/00-9/01	106,405
		VoiceStream	VoiceStream	9/01-8/02	86,254*
		T-Mobile	VoiceStream	8/02-now	260,528
	PCF	Western Wireless	Western Wireless	6/02-8/02	1791
NEMRT	ABW	American Portable Tel.	American Portable Tel.	2/98-4/98	125
		Aerial Communications	Aerial Communications	4/98-5/00	14,097
		VoiceStream	Aerial Communications	5/00-11/00	7,252
	WCG	VoiceStream	Western Wireless	11/00-9/01	29,200
		VoiceStream	VoiceStream	9/01-9/02	46,577(9/02)
		T-Mobile	VoiceStream	9/02-9/03	144,992(9/03)
Modern	ABW	American Portable Tel.	American Portable Tel.	2/98-4/98	627
		Aerial Communications	Aerial Communications	4/98-5/00	5,817
		VoiceStream	Aerial Communications	5/00-11/00	4502
	WCG	VoiceStream	Western Wireless	11/00-9/01	26,604
		VoiceStream	VoiceStream	9/01-Sum. 02	23,665(4/02)

Shaded rows indicate discrepancies between the company responsible for the traffic reported on the CTUSR and the company reported on the CTUSR as provided by SWBT.

*February & March 2002 CTUSR missing