

**Mark P. Johnson**  
816.460.2424  
mjohnson@sonnenschein.com

4520 Main Street  
Suite 1100  
Kansas City, MO 64111  
816.460.2400  
816.531.7545 fax  
www.sonnenschein.com

*Chicago  
Kansas City  
Los Angeles  
New York  
San Francisco  
Short Hills, N.J.  
St. Louis  
Washington, D.C.  
West Palm Beach*

September 10, 2003

**Via Federal Express**

Mr. Dale H. Roberts  
Executive Secretary  
MISSOURI PUBLIC SERVICE COMMISSION  
200 Madison Street, Suite 100  
Jefferson City, Missouri 65102-0360

**RE: Case No. TC-2002-1077**

**FILED<sup>2</sup>**  
SEP 11 2003  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Please find enclosed for filing with the Commission the original and nine copies of the Direct Testimony of Ronald Williams on behalf of Respondents in the above-referenced case. Please return one "filed" copy of the Direct Testimony to me in the enclosed return envelope.

By copy of this letter, I have served a copy of this testimony to all counsel of record via electronic mail and U.S. mail.

Thank you in advance for bringing this testimony to the attention of the Commission.

Very truly yours,

*Mark Johnson /rgr*

Mark P. Johnson

MPJ/rgr

Enclosures

cc: All Parties of Records (w/enclosure) (via e-mail & U.S. mail)

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

SEP 11 2003

Missouri Public  
Service Commission

BPS Telephone Company, et al., )  
)  
Complainants, )  
)  
v. )  
)  
VoiceStream Wireless Corporation, et al., )  
)  
Respondents. )

Case No. TC-2002-1077

**DIRECT TESTIMONY**

**of**

**RONALD WILLIAMS**

**on Behalf of**

**RESPONDENTS**

September 10, 2003

## DIRECT TESTIMONY OF RONALD WILLIAMS

1   **Q:   Please state your name, occupation, and address.**

2   A:   My name is Ronald Williams. I am employed by Western Wireless as Director –  
3       InterCarrier Relations. My business address is 3650 131<sup>st</sup> Avenue S.E., Suite  
4       400, Bellevue, Washington.

5   **Q:   Please describe your duties with Western Wireless.**

6   A:   I am employed as Director - InterCarrier Relations by Western Wireless  
7       Corporation. My duties and responsibilities include developing effective and  
8       economic interconnection and operational relationships with other  
9       telecommunications carriers. I work with other departments within Western  
10      Wireless to develop plans to deal with company needs and interface with carriers  
11      to ensure arrangements are in place to meet the operational objectives of the  
12      company.

13  **Q:   Please describe your background in the telecommunications industry.**

14  A:   I have ten years experience working for GTE (now Verizon), including six years  
15      in Telephone Operations and business development, and four years in cellular  
16      operations. I also have two years experience in start-up CLEC operations with  
17      FairPoint Communications. Since August 1999, I have worked for Western  
18      Wireless, first as the Director of CLEC operations and, more recently, in my  
19      current position in InterCarrier Relations.

1 **Q: On whose behalf are you testifying?**

2 A: I am testifying on behalf of the respondents in this docket, Western Wireless and  
3 T-Mobile USA, Inc. VoiceStream Communications is listed as a respondent in  
4 this case. In August, 2002, VoiceStream changed its name to T-Mobile. The  
5 other company listed as a respondent, Aerial Communications, was acquired by  
6 T-Mobile in May, 2000.

7 **Q: Are T-Mobile and Western Wireless affiliated?**

8 A: Not today. T-Mobile (formerly VoiceStream) was spun off from Western Wireless  
9 in April, 1999, and the companies are no longer affiliated. However, I have been  
10 authorized to testify in this proceeding on behalf of both companies.

11 **Q: What is the purpose of your testimony?**

12 A: The purpose of my testimony is to present to the Commission the conclusion of  
13 T-Mobile and Western Wireless as to the best procedure to determine the  
14 jurisdictional allocation of wireless traffic in Missouri, between interMTA and  
15 intraMTA traffic.

16 **Q: What would be the best procedure to determine the allocation of such**  
17 **traffic?**

18 A: Due to the inherent difficulty in determining the jurisdiction of the traffic, Western  
19 Wireless and T-Mobile believe that a negotiated settlement would serve all  
20 parties. It is impossible to forecast what percentage of future telecom-  
21 munications traffic will be interMTA or intraMTA. Likewise, the jurisdictional  
22 nature of past traffic – whether the traffic originated and terminated within the  
23 same MTA – is very difficult to account for as wireless systems are not set up to

1 track originating and terminating jurisdiction and the presence of roamers with  
2 NPA-NXXs rated outside the MTA cloud simple analysis. Accordingly,  
3 representatives of both companies, including myself, have engaged in extensive  
4 negotiations with the complainant ILECs' representatives to reach such a  
5 settlement.

6 **Q: Do you believe that these negotiations would be successful?**

7 A: Yes, I do. I believe that these negotiations would yield a percentage allocation of  
8 the traffic which Western Wireless and T-Mobile would be willing to present to the  
9 Commission as a reliable estimate of the actual allocation. Western Wireless  
10 and T-Mobile have negotiated in good faith, and will continue to negotiate in that  
11 manner, to arrive at figures which represent fairly the traffic.

12 **Q: Does that conclude your testimony?**

13 A: Yes.

STATE OF WASHINGTON )  
 ) ss.  
 COUNTY OF KING )

**VERIFICATION**

Comes now Ronald Williams, being of lawful age and duly sworn, and states that he has read the foregoing direct testimony, and that it is true and correct to the best of his knowledge and belief.

*Ronald Williams*  
 \_\_\_\_\_  
 Ronald Williams

Sworn to and subscribed before me this 0 day of September, 2003

*Regina M. Del Giorgio*  
 \_\_\_\_\_  
 Notary Public

My commission expires: 11/03/04

