

Exhibit No.:

Issues: Availability for Resale of Local Plus
Service by Competitive Companies

Witness: Arthur P. Kuss

Sponsoring Party: MOPSC Staff

Type of Exhibit: Rebuttal Testimony

Case No.: TO-2000-667

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

ARTHUR P. KUSS

**In the Matter of the Investigation into the Effective Availability for Resale of
Southwestern Bell Telephone Company's Local Plus Service by Interexchange
Companies and by Facilities-Based Competitive Local Exchange Companies**

CASE NO. TO-2000-667

Jefferson City, Missouri
November 08, 2000

FILED
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Missouri Public
Service Commission

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Rebuttal Testimony of
Arthur P. Kuss

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

2 A. My purpose is to respond to the Direct Testimonies of David Jones, on behalf
3 of the Missouri Independent Telephone Company Group (MITG), and Thomas F.
4 Hughes, representing Southwestern Bell Telephone Company (SWBT). Both Mr. Jones
5 and Mr. Hughes discuss a traffic test conducted in Case No. TO-99-593.

6 ***Q. What is Case No. TO-99-593?***

7 A. Case No. TO-99-593, currently before the Commission, concerns an
8 investigation into signaling protocols, trunking arrangements, traffic measurement, and
9 call records between Local Exchange Carriers (LECs). These issues remained
10 outstanding after the termination of the Primary Toll Carrier (PTC) Plan in 1999 as an
11 outcome of Case No. TO-99-254.

12 ***Q. What was the purpose in conducting the traffic test of Case No. TO-99-593?***

13 A. A concern was expressed that Feature Group C traffic was not being properly
14 recorded or compensated.¹ By comparing all company LEC-to-LEC traffic records for an
15 agreed-upon test period, discrepancies in records and compensation could perhaps be
16 identified, and solutions proposed.

17 ***Q. In what way do the test results of Case No. TO-99-593 relate to this case?***

18 A. Preliminary test results suggest that certain interexchange traffic may not be
19 properly recorded or compensated. Some of this errant traffic may have included SWBT's
20 Local Plus traffic.²

1 Direct Testimony of David Jones, Page 6, Lines 3 through 5.

2 Direct Testimonies of David Jones, Page 7, Lines 15 through 17, and of Thomas Hughes, Page 10, Lines 10 through 15.

Rebuttal Testimony of
Arthur P. Kuss

1 ***Q. Has the test of Case No. TO-99-593 established ultimate responsibility for***
2 ***all errors in traffic recording and compensation?***

3 A. Not entirely. The results of the traffic test are continuing to be reviewed, and
4 all issues have not been fully evaluated at this time. A final report of the test results has
5 not yet been completely compiled and distributed to the parties in the case.

6 ***Q. Is there any other significance of Case No. TO-99-593 to this case?***

7 A. Except for the discovery that some Local Plus traffic may be associated with
8 erroneous traffic records, there is no other factor relating to the instant case.

9 ***Q. In summary, what is your opinion of the relevant Direct Testimony?***

10 A. I concur with the statements made by Mr. Jones in regards to the necessity for
11 accurate recording and compensation for Local Plus traffic. I support the efforts
12 described by Mr. Hughes of SWBT to establish appropriate settlements with all affected
13 carriers. The proper recording and compensation of Local Plus traffic are issues that need
14 to be resolved as quickly as possible. Should these issues remain unresolved in this case,
15 I anticipate these same issues may be re-introduced in testimony for Case No. TO-99-593.

16 ***Q. Does this conclude your rebuttal testimony?***

17 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Investigation into
the Effective Availability for Resale of
Southwestern Bell Telephone
Company's Local Plus Service by
Interexchange Companies and by
Facilities-Based Competitive Local
Exchange Companies

Case No. TO-2000-667

AFFIDAVIT OF ARTHUR P. KUSS

STATE OF MISSOURI

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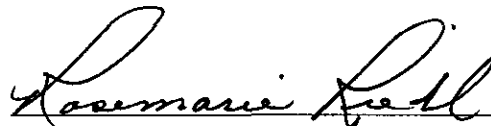
COUNTY OF COLE

Arthur P. Kuss, of lawful age, being duly sworn and on his oath states: that he hereby swears and affirms that his answers contained in the attached rebuttal testimony to the questions therein propounded, consist of 3 pages to be presented in the above case; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.



Arthur P. Kuss

Subscribed and sworn to before me this 7th day of November 2000.



Notary Public, State of Missouri

County of Cole

My Commission Expires June 1, 2001