

Exhibit :
Issue : Records
Witness : Joyce L. Dunlap
Type of Exhibit : Surrebuttal Testimony
Sponsoring Party : Southwestern Bell Telephone Company
Company : Southwestern Bell Telephone Company
Case No. : TO-2000-667

SOUTHWESTERN BELL TELEPHONE COMPANY

CASE NO. TO-2000-667

SURREBUTTAL TESTIMONY

OF

JOYCE L. DUNLAP

FILED²
DEC 11 2000
Missouri Public
Service Commission

St. Louis, Missouri

December, 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
DEC 11 2000

Missouri Public
Service Commission

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

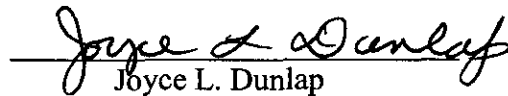
Case No. TO-2000-667

AFFIDAVIT OF JOYCE L. DUNLAP

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

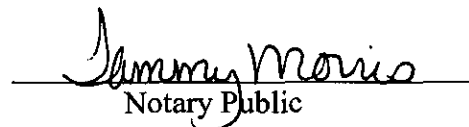
I, Joyce L. Dunlap, of lawful age, being duly sworn, depose and state:

1. My name is Joyce L. Dunlap. I am presently Associate Director-Exchange Carrier Relations/Settlements for Southwestern Bell Telephone Company.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.


Joyce L. Dunlap

Subscribed and sworn to before me this 11th day of December 2000.

TAMMY R MORRIS
NOTARY PUBLIC STATE OF MISSOURI
COLE COUNTY
MY COMMISSION EXP. APR. 4, 2004


Notary Public

My Commission Expires: April 4, 2004

1 **SURREBUTTAL TESTIMONY OF JOYCE L. DUNLAP**

2

3 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

4 A. My name is Joyce L. Dunlap. My business address is One Bell Center 31-P-5, St.
5 Louis Missouri 63101

6

7 **Q. ARE YOU THE SAME JOYCE DUNLAP WHO FILED REBUTTAL**
8 **TESTIMONY IN THIS CASE?**

9 A. Yes, I am.

10

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 A. The purpose of my testimony is to respond to the Rebuttal Testimony MITG witness
13 David Jones and STCG witness Robert Schoonmaker

14

15 **Q. MR. JONES, AT PP. 5 – 7 OF HIS REBUTTAL TESTIMONY, APPEARS TO**
16 **INDICATE THAT SWBT IS UNWILLING TO PAY TERMINATING**
17 **ACCESS CHARGES WHEN ITS RETAIL LOCAL PLUS SERVICE IS**
18 **BEING RESOLD. IS THIS CORRECT?**

19 A. No. As I indicated at p. 9 of my Rebuttal Testimony, SWBT recognizes its
20 responsibility to pay terminating access charges to other carriers that terminate
21 SWBT's Local Plus traffic when its Local Plus service is being resold. At pp. 4 – 5 of
22 my Rebuttal Testimony, I described the mechanisms SWBT put in place to provide
23 records to carriers that terminate SWBT's Local Plus traffic to enable those carriers to

1 bill SWBT for terminating this traffic. This mechanism provides records both for
2 Local Plus traffic originated by SWBT's retail customers and by CLEC customers
3 being served on a resale basis.
4

5 **Q. IT IS SWBT'S POSITION THAT CLECS PROVIDING A LOCAL PLUS**
6 **TYPE SERVICE USING UNBUNDLED SWITCHING FROM SWBT IS THE**
7 **ORIGINATING CARRIER AND THE ONE RESPONSIBLE FOR PAYING**
8 **FOR THE TERMINATION OF ITS CUSTOMERS TRAFFIC. IF SWBT'S**
9 **SWITCH IS BEING USED, HOW WOULD THE CLEC OBTAIN THE**
10 **APPROPRIATE RECORDS FOR ITS CUSTOMERS' CALLS TO PASS**
11 **ALONG TO THE TERMINATING CARRIER?**

12 A. On toll calls that a CLEC originates on an UNE basis (i.e. utilizing SWBT's
13 unbundled local switching), SWBT records the call and provides the CLEC with an
14 EMR 01-01-01 and 92-01 detail record. The CLEC then uses the EMR 01-01-01
15 record to bill its customer. It is the responsibility of the CLEC to create a 92-99
16 summary record from the 92-01 detail records to pass along to all parties on the call
17 path.
18

19 On toll call that a facility based CLEC originates using its own switch, it is the
20 responsibility of the CLEC to create all necessary records at its switch and pass to all
21 companies on the call path the necessary records to bill the appropriate access.
22

1 **Q. MR. SCHOONMAKER REFERENCES THE 001 CALL CODE**

2 **RECORDINGS ON PAGE 10 OF HIS REBUTTAL TESTIMONY. CAN YOU**
3 **PLEASE EXPLAIN WHAT SWBT DOES WITH 001 CALL RECORDS?**

4 A. As discussed on page 10 of Mr. Hughes' Direct Testimony, the intercompany
5 settlement system with ILECs does not create or include local records (call code 001)
6 in the intercompany settlement process. Only LEC carried intraLATA toll (call code
7 006), 800 and OUTWATS records are created and processed by the settlement system
8 for ILEC destined calls. Since these records are not included in the settlement
9 process, no terminating compensation was paid. As I discussed in my rebuttal
10 testimony, SWBT was recording Local Plus calls incorrectly (i.e., with a call code of
11 001) in our Ericsson switches.

12
13 **Q. DID THIS SITUATION IMPACT THE ILECS?**

14 A. Yes it did. SWBT recognizes that it should have been paying terminating
15 compensation for these calls. SWBT regrets this mistake, but believes that, after the
16 problem was identified, it has moved expediently to 1) correct the situation and 2)
17 offer a settlement and is now in the process of working with the involved companies
18 to settle the billing discrepancy.

19
20 **Q. MR. SCHOONMAKER'S REBUTTAL AT PAGE 9 LINES 18 THROUGH 23**
21 **TALKS ABOUT A PROBLEM IN SWBT'S KENNETT SWITCH. HAS THIS**
22 **PROBLEM BEEN FIXED?**

1 A. Yes, it was corrected in September 2000. The Kennett switch is an Ericsson switch
2 and had the same translation problem that was found in the other Ericsson switches.
3 SWBT is currently also working on adjustment for the companies in the St. Louis
4 LATA that were affected by this problem.
5

6 **Q. ON PAGE 9 AT LINES 4 THROUGH 13 OF MR. JONES' REBUTTAL**
7 **REFERENCE IS MADE TO THE FACT THAT BILLING AND**
8 **TRANSLATIONS PROBLEMS MAY EXIST IN MANY SWBT SWITCHES.**
9 **DO YOU AGREE?**

10 A. No. As a result of the problem we encountered in our Ericsson switches, we
11 rechecked the translations in all of our other Missouri switches. During that review,
12 we found some other translations errors that were relatively minor. These errors have
13 also been corrected and SWBT is documenting these corrections in reports that will
14 be part of an overall report on the records test that the Missouri Telephone Industry is
15 currently drafting.
16

17 **Q. WHEN WILL THAT REPORT BE COMPLETED?**

18 A. That report should be completed by early January 2001.
19

20 **Q. WAS SWBT RECORDING ALL OCA CALLS INCORRECTLY AS**
21 **INDICATED BY MR. JONES IN HIS TESTIMONY AT PAGE 9 LINES 12**
22 **AND 13?**

1 **A.** No. Through our reconciliation process we did find and have corrected in September
2 2000 a translations error in the recording of OCA calls in our Marshall switch. An
3 adjustment for these calls will be included in the retroactive settlement that is being
4 made to the involved LECs.

5

6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

7 **A.** Yes it does.