

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

FILED²

OCT 2 2000

Missouri Public
Service Commission

In the Matter of the Investigation into the)
Effective Availability for Resale of South-)
Western Bell Telephone Company's Local)
Plus Service by Interexchange Companies)
And by Facilities-Based Competitive Local)
Exchange Companies.)

Case No. TO-2000-667

DIRECT TESTIMONY

OF

GARY GODFREY

Jefferson City, Missouri

October 2, 2000

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

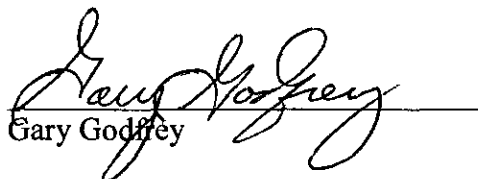
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AFFIDAVIT OF GARY GODFREY

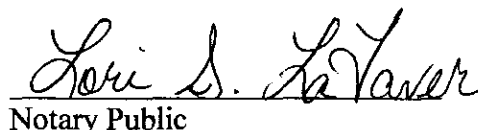
STATE OF MISSOURI)
) ss.
COUNTY OF SULLIVAN)

Gary Godfrey, 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.



Gary Godfrey

Subscribed and sworn to before me this 28th day of
September, 2000.

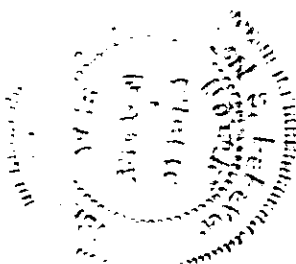


Lori S. LaFaver

Notary Public

My Commission Expires: 9/26/2004.

**Lori S. LaFaver, Notary Public
Sullivan County, State of Missouri
My Commission Expires 9/26/2004**



1 **Q. Please state your name, capacity, and address.**

2 A. Gary Godfrey, Office Manager for Northeast Missouri Rural Telephone Company
3 (Northeast) and its affiliate, Modern Telecommunications Company (Modern),
4 718 S. West St., Green City, Missouri, 63545.

5 **Q. On whose behalf do you present this testimony?**

6 A. I am testifying on behalf of the Missouri Independent Telephone Company Group
7 (MITG).

8 **Q. What is the purpose of your direct testimony?**

9 A. I will generally concur in the direct testimony of David Jones on behalf of the
10 MITG. I will also set forth additional information pertinent to Northeast and
11 Modern.

12 **Q. Have you had an opportunity to review the direct testimony of David Jones?**

13 A. Yes. I agree with his description of Local Plus (LP), the underlying history of LP,
14 LP traffic reporting problems, and his recommendations with respect to future LP
15 terminating compensation.

16 **Q. In some e-mails to the small ILECs, SWB indicated its failure to record**
17 **terminating LP was limited to SWB Ericsson switches in its Knob Noster,**
18 **Sedalia, Lamonte, Marshall, and Slater exchanges. Do you have information**
19 **indicating that this may not be true?**

20 A. Yes. Northeast and Modern were two of the companies participating in the July,
21 2000 48 hour test. Based upon the call detail report of unmatched calls, several
22 calls for which no billing records were received from SWB were from SWB
23 exchanges not served by an Ericsson switch. Curiously, this seems to be more

1 prevalent for calls terminating to Northeast exchanges than for calls terminating
2 to Modern exchanges.

3 **Q. What extent of discrepancy for Northeast and Modern was recorded for the**
4 **48 hour test?**

5 A. For messages terminating to Northeast on SWB's trunks, Northeast received a
6 billing record from SWB for only 41.1% of the total messages. On the other hand
7 Modern received a billing record for 96.4% of the total messages.

8 **Q. What have you done to attempt to determine the reasons for the missing**
9 **records for Northeast?**

10 A. Based upon the unmatched call records for Northeast, we have called a few of the
11 originating numbers and obtained confirmation that these customers were SWB
12 LP subscribers. These customers did *not* originate their calls from a SWB
13 exchange served by an Ericcson switch. Thus we have some indication that
14 SWB's LP recording problem is *not* limited to its Ericcson switches. This has not
15 been an exhaustive survey, as we did not want to overly bother customers
16 regarding an intercompany problem they might not understand. Based upon our
17 contacts, we believe that SWB is failing to record and report all LP terminating
18 traffic. Northeast cannot state with certainty what proportions of the unreported
19 traffic is constituted by LP traffic, Designated Number traffic, or even 1+ toll
20 traffic.

21 **Q. Can you explain why Northeast experienced such a higher percentage of**
22 **unmatched messages than did Modern during the test?**

1 A. No. Neither Northeast nor Modern is capable of capturing sufficient information
2 to do this, even during the test when our systems and those of SWB were
3 orchestrated to make as much information as possible available. It is troublesome
4 to me that such a difference exists. Both the Modern and Northeast exchanges
5 subtend the same Northeast Green City tandem switch. Traffic terminating from
6 SWB to both Modern and Northeast come over the same trunk groups. I don't
7 understand what type of translations SWB could have made in its systems that
8 would result in such a difference in reported records for Northeast as compared to
9 Modern. It appears to me that either the translations SWB performed were not
10 consistently applied to Modern and Northeast exchanges, or that SWB applied
11 different translations for Modern than it applied for Northeast. I look forward to
12 receiving a satisfactory explanation.

13 **Q. Does this complete your direct testimony?**

14 A. Yes.