

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

In the Matter of CenturyTel of Missouri, LLC and )	
Spectra Communications Group, LLC, d/b/a )	<b>Case No. TC-2007-0307</b>
CenturyTel Tariff Filings to Grandfather Remote )	Tariff Nos. JI-2007-0498
Call Forward Services to Existing Customers and )	JI-2007-0499
Existing Locations. )	

**CENTURYTEL'S STATEMENT OF POSITIONS**

COME NOW CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, d/b/a CenturyTel (collectively "CenturyTel"), pursuant to the Commission's *Order Setting Procedural Schedule* of March 26, 2007, and for their Statement of Positions respectfully state as follows:

**Issue 1.**     *Should the Commission approve CenturyTel of Missouri, LLC's and Spectra Communications Group, LLC d/b/a CenturyTel's (collectively "CenturyTel") tariff filings to grandfather Remote Call Forward ("RCF") service to existing customers and existing locations?*

**CenturyTel Position: Yes.**

- These January 19, 2007 tariff filings to grandfather a non-essential telecommunications service to existing customers (less than one half of one percent of total customers) at existing locations were made in accordance with Commission Rules and should be approved. Existing telecommunications customers will be kept whole and new customers may subscribe to other tariffed services that are less subject to the types of abuse that RCF service invites. (Martinez Direct, pages 7-11, 13-15; Martinez Rebuttal, page 12.)

- Filings are necessary to stem abuse and violations of the tariff provisions that specifically restrict RCF service to one voice call at a time (as compared to data calls) and prohibit the use of RCF service for toll bypass. Such violations and abuse of this non-essential telecommunications service by Internet Service Providers (“ISPs”) who place multiple simultaneous dial-up Internet calling on a ported RCF service number can cause network congestion on the toll network and negatively impact other telecommunications consumers trying to make toll voice calls for which this network was designed. (Martinez Direct, pages 5-7, 9-11, 15; Teasley Direct, pages 5-6, 6-10, 11; Martinez Rebuttal, pages 2-4, 8; Teasley Rebuttal, pages 2-3; Martinez Surrebuttal, pages 2, 3, 7, 8; Teasley Surrebuttal, pages 2-3.)
- Given CenturyTel’s experience in the state of Washington, RCF service is subject to serious fraud perpetrated by prison inmates and their co-conspirators causing large revenue losses to the Company. Such fraud and abuse of RCF service by prison inmates and their co-conspirators provides further justification for grandfathering CenturyTel’s RCF service, especially in light of the fact that so few legitimate CenturyTel customers subscribe to the service. (Martinez Direct, pages 8-9.)
- CenturyTel has demonstrated its ability to meet the requirements of the Commission’s Rule concerning the provision of service in emergency situations, and CenturyTel has other means of providing service in the

event of an emergency or disaster. (Martinez Rebuttal, pages 9-12; Teasley Rebuttal, page 4; Martinez Surrebuttal, pages 7-9.)

**Issue 2.** *Should the Commission require CenturyTel to fulfill Socket Internet's orders for RCF service submitted after the tariff filings, before being allowed to grandfather that service?*

**CenturyTel Position:** No.

- Subsequent to the filing of the tariffs to grandfather RCF service, on February 8, 2007, Socket Internet submitted a request for RCF service in 61 exchanges. As Socket Internet readily admits in its prefiled testimony, Socket Internet is attempting to purchase CenturyTel's RCF service in conjunction with a subsequent Socket Telecom porting order. This is simply a scheme by Socket to take advantage of regulatory arbitrage, whereby it uses RCF service for multiple simultaneous calls, toll by-pass and data traffic, all in violation of CenturyTel's tariff. Based on the tariff restrictions for RCF Service, as well as general tariff provisions that allow CenturyTel to refuse to provision services because of fraud and abuse, CenturyTel may legitimately refuse to grant the 61 additional RCF service numbers requested by Socket. (Martinez Direct, pages 12-13; Teasley Direct, pages 6-10, 11; Martinez Rebuttal, pages 2-4; Martinez Surrebuttal, pages 2, 3, 4-5; 6-7; Teasley Surrebuttal, page 4.)

- Socket simply wants to shift the cost of transport and facility augmentation (*i.e.* its costs of doing business) to CenturyTel so that CenturyTel inappropriately bears the burden of providing service to Socket ISP customers. CenturyTel's testimony details the problems with placing ISP-bound traffic on the common trunk group and how ISP-bound traffic causes network congestion. (Martinez Direct, pages 15-16; Teasley Direct, pages 6-10, 11; Martinez Rebuttal, pages 2-4, 8; Martinez Surrebuttal, pages 2, 3; Teasley Surrebuttal, pages 2-3, 4.)
- Socket Internet, to the extent that it needs Remote Call Forwarding services, has the ability to purchase these services from Socket Telecom's tariffed services. The claimed need for CenturyTel numbers because there would be less confusion for its customers is unfounded. CenturyTel routinely introduces new NPA/NXXs to its customers without any resulting confusion. (Martinez Direct, pages 13-16; Teasley Direct, page 6; Martinez Rebuttal, pages 5-6.)

Respectfully submitted,

/s/ James M. Fischer

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d/b/a CenturyTel

**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13<sup>th</sup> day of August, 2007.

/s/ James M. Fischer

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James M. Fischer