

Exhibit No. _____
Issue: _____
Witness: Kurt Bruemmer
Type of Exhibit: Direct
Sponsoring Party: Socket Telecom, LLC
Case No.: TO-2006-0299
Date: March 21, 2006

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

**PETITION OF SOCKET TELECOM, LLC)
FOR COMPULSORY ARBITRATION OF)
INTERCONNECTION AGREEMENTS WITH) CASE NO. TO-2006-0299
CENTURYTEL OF MISSOURI, LLC AND)
SPECTRA COMMUNICATIONS, LLC)
PURSUANT TO SECTION 252(b)(1) OF THE)
TELECOMMUNICATIONS ACT OF 1996)**

**DIRECT TESTIMONY OF
KURT BRUEMMER ON BEHALF OF
SOCKET TELECOM, LLC**

William L. Magness
Texas State Bar No. 12824020
CASEY, GENTZ & MAGNESS, L.L.P.
98 San Jacinto Blvd., Suite 1400
Austin, Texas 78701
512/225-0019 (Direct)
512/480-9200 (Fax)
bmagness@phonelaw.com

Carl J. Lumley, #32869
Leland B. Curtis, #20550
CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com

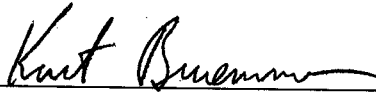
ATTORNEYS FOR SOCKET TELECOM, LLC

March 21, 2006

STATE OF MISSOURI)
)
COUNTY OF BOONE) SS.

VERIFICATION

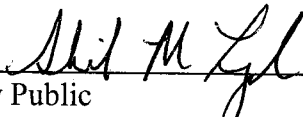
Kurt F. Bruemmer, being first duly sworn, deposes and say that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony"; that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the fact in said testimony and schedule, he would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of his knowledge, information and belief.



Kurt F. Bruemmer

On this 21st day of March, 2006, before me, a Notary Public, personally appeared Kurt F. Bruemmer, and being first duly sworn upon his oath stated that he is over twenty-one years, sound of mind and by Socket Holdings Corporation and assigned to work for Socket Telecom, LLC, he signed the foregoing document as an employee of by Socket Holdings Corporation and assigned to work for Socket Telecom, LLC, and the facts contained therein are true and correct according to the best of his information, knowledge and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year above-written.



Notary Public

My Commission Expires:

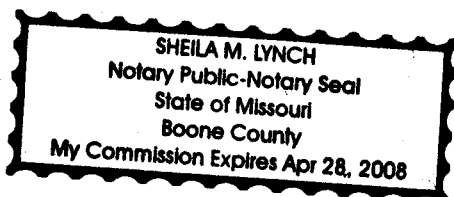


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**DIRECT TESTIMONY OF
KURT BRUEMMER ON BEHALF OF
SOCKET TELECOM, LLC**

Q. Please state your name and address.

A. My name is Kurt Bruemmer. My business address is 1005 Cherry Street, Suite 104, Columbia, MO 65201.

Q. By whom are you employed and what are your responsibilities?

A. I am employed by Socket Holdings Corporation and work as Director of Operations. In this position, I am responsible for Socket's Network Operations, Customer Technical Support, Consumer Billing, Application Development, Major Account Care and Telecom Operations.

Q. Please describe your educational background.

A. I have a Bachelor of Science degree in Engineering Management from the University of Missouri – Rolla.

Q. What is your prior work experience?

A. Prior to joining Socket, I was employed by AmerenUE at the Callaway Nuclear Plant as a Quality Engineer in the Independent Safety Engineering Group. In that position I was responsible for producing plant experience reports for use by other nuclear plants to learn from and also applying plant experience from both Callaway and other nuclear plants to Callaway. I was also involved in responding to Nuclear Regulatory Commission findings.

Prior to that, I was employed by Scholastic Corporation as a Quality Manager. My duties involved incorporating new systems into the operations of the company to

1 reduce errors, increasing the use of customer feedback to the operations of the company
2 and detection of errors before the product was shipped to the customer.

3 Before Scholastic, I was employed at Square D Company's circuit breaker
4 manufacturing plant in Columbia, MO as a Quality Engineer. My responsibilities
5 included the detection and prevention of product defects by improving manufacturing
6 methods and inspection procedures, procedure writing, quality auditing, materials
7 inspection, training and computer application development.

8 Through other prior employment, I also have experience as a Computer
9 Programmer and Process Engineering Intern.

10 **Q. What issues are you addressing in your direct testimony?**

11 A. My testimony first addresses issues raised by Socket in Article IX – Maintenance,
12 where I will discuss the necessity for notification concerning outages, as well as Socket's
13 need for a liaison with CenturyTel separate from CenturyTel's retail repair center. I also
14 will address Issue 6 in Article VIII, concerning similar notification issues in relation to
15 the completion or change in status of service orders. Finally, I present testimony on
16 Socket's proposal in Article XIII that CenturyTel implement an electronic Operations
17 Support System.

ARTICLE IX – MAINTENANCE

Issue 1: Should Socket contact CenturyTel to obtain desired information relating to Maintenance matters or should CenturyTel provide the information in advance unsolicited?

Q. Why does Socket need notification of maintenance activity on CenturyTel's network?

A. Socket currently notifies its customers in advance of maintenance that can affect their service. To maintain this level of service expected by our customers, it is vital that we are aware of maintenance activity taking place that can affect our customers. Businesses do not tolerate unannounced maintenance outages and I suspect we would lose a number of customers if this were a regular business practice.

Q. Isn't it difficult for CenturyTel to know which maintenance activities and outages affect Socket customers?

A. Yes. That is why Socket has suggested that CenturyTel send us all maintenance notifications and outage notifications. We are then willing to sort through them and determine if they affect our customers. This is a common method for the other ILECs and IXC's with whom we do business.

Q. How does lack of knowledge on potential outages affect Socket's operations?

A. In two ways. First, the lack of knowledge of an outage generally causes unnecessary troubleshooting that could make the problem worse. Second, it hinders our ability to serve our customers. Customers who call about a problem with their service will not be able to get an accurate description of the problem and will likely waste time

1 making return calls and troubleshooting their service. Again, notifying carriers about
2 outages is a standard practice with other carriers with whom we do business.

3 **Q. Can you explain Socket's definition of an outage as being "5,000 or more blocked**
4 **call attempts in a ten (10) minute period in a single exchange"?**

5 A. This definition recognizes the difficulty of CenturyTel being able to identify
6 which outages affect Socket's customers. As such, it is important to note that we feel that
7 the definition of an outage should encompass blocked calls for all customers on the PSTN
8 in a CenturyTel exchange – it is not just CenturyTel customers' calls, but also Socket
9 customer calls and every other call going through CenturyTel's switch. We feel this
10 definition would create a manageable process for CenturyTel and would alert us to most
11 outages without requiring a notice of every individual CenturyTel customer outage.

12 During negotiations with CenturyTel, it became our understanding that
13 CenturyTel does not measure outages by blocked calls but, instead, by lines of service.
14 We would be willing to alter our definition of outage to better fit CenturyTel's current
15 internal definition. But however an outage is defined, it still needs to encompass all
16 customer lines or traffic, not just Socket's, since there is apparently no easy way to
17 distinguish between the two. Obviously, if it is known that a smaller outage will affect a
18 Socket customer, we expect that notification also.

19 **Q. Why does Socket need CenturyTel to initiate the contact on outages and**
20 **maintenance activities?**

21 A. I believe an appropriate analogy is the way we handled product recalls when I was
22 working in the Quality Department at Square D Company. When that occurred, we would

1 actively notify the customers based on our records of who had purchased the products, in
2 addition to producing public notices. Customers were not expected to call in periodically
3 to find out if there had been a recall on the products they had purchased.

4 **Q. Why does Socket need notification of missed repair commitments during manual**
5 **mode operation?**

6 A. When a customer is having service issues, it is important that they have a good
7 understanding of the progress being made toward service restoration. This is a basic
8 Customer Service goal. If a customer has been told when to expect action toward
9 restoration and that time passes without resolution, they begin to doubt our ability to
10 provide reliable service. At a minimum, if the repair commitment isn't going to be met,
11 the customer needs notification of the status. Any competitive business would be
12 expected to give their customers this courtesy. Socket's past history with CenturyTel has
13 shown that repair commitments are often not met, so the requirement that Socket be
14 notified of delays is essential to our ability to conduct business.

15 **Q. In your proposed contract language, you are also asking for a log of ticket statuses**
16 **during manual operation. Why do you feel this is important?**

17 A. Because we have no ability to see the status of all tickets by electronic means,
18 Socket's proposal is the only means for us to have a clear picture of all trouble status. The
19 language is intended to include tickets that have been closed, so that would also be the
20 method for us to see the final disposition of all tickets.

1 **Issue 2: Must the single point of contact CenturyTel agrees to provide be a person**
2 **or organization separate and apart from CenturyTel's existing repair**
3 **center?**

4
5 **Q. Why does Socket feel the single point of contact for repair reporting and status be**
6 **apart from the existing retail repair center?**

7 A. It has been our experience that it is very common to encounter a person in
8 CenturyTel's retail repair center who does not understand interconnection circuit IDs.
9 Those IDs are a different format from retail circuit IDs, and it is certainly understandable
10 if that is foreign to someone trained in assisting retail customers. In addition, when we
11 call the repair center, we must first wait through a message that explains checking the
12 Network Interface Device and asks about taking part in a customer service survey –
13 clearly retail-only processes that are irrelevant to Socket. Then we are put into the same
14 queue as retail customers. These items slow down even getting to a representative. We
15 have even had a case where we had to wait through these items in an attempt to start a
16 ticket during an outage of our Columbia 911 trunks, which created a serious delay
17 endangering public safety.

18 CenturyTel's process also does not meet a parity standard. At least I would be
19 very surprised if CenturyTel follows this same process to get a problem resolved
20 internally. CenturyTel's reliance on a retail repair center is also inconsistent with other
21 carriers that have Operations Centers that take calls directly from carriers and that appear
22 to have the same service restoration capabilities for their CLEC customers as they have
23 internally.

24 **Q. To your knowledge, does CenturyTel have an Operations Center?**

1 A. Yes. During negotiations, it was brought to our attention that CenturyTel does
2 have a Network Operations Center.

3
4 **ARTICLE VIII – ORDERING & PROVISIONING**
5

6 **Issue 6: When CenturyTel completes work for Socket, what is the manner and**
7 **substance, if any, of CenturyTel’s notice of such completion?**
8

9 **Q. Can you summarize this issue?**

10 A. I believe this issue can be reduced to whether CenturyTel should make active
11 contact with Socket at the completion of a Service Order or when an order enters
12 jeopardy status or otherwise changes status or, as CenturyTel proposes, Socket would
13 instead be required to monitor a website for an update. Socket believes that it is
14 incumbent upon CenturyTel to provide this information to Socket via e-mail or facsimile
15 rather than require Socket to monitor CenturyTel’s website to find this information.

16 **Q. Why does Socket prefer CenturyTel actively contact it for notifications?**

17 A. I believe that it is reasonable to expect active notification as soon as possible
18 when an order changes status. As CenturyTel is the vendor that is either completing the
19 order, placing the order in jeopardy status, or rejecting the order, CenturyTel is in the best
20 position to know when the order status changes.

21 Consider the example of a jeopardy notice for circuit installation. As an initial
22 matter, CenturyTel does not actively update its website on a timely basis. But even if
23 CenturyTel were to begin making a concerted effort to post changes on the website as
24 soon as they occur, Socket cannot reasonably be expected to find such critical
25 information through this roundabout notification method. An order can be placed into

1 Jeopardy Status the day of a circuit installation or even minutes before the close of
2 business on the due date. Unless Socket initiates a continuous monitoring of the
3 CenturyTel Internet Services Customer Portal, there is no way to guarantee that Socket
4 would know that the order was not going to be completed on time.

5 Socket's business needs require it to have as much notice as possible so that
6 Socket has an opportunity to contact the customer to let them know the due date is
7 changing. Installation often requires the scheduling of a customer's CPE vendor as well
8 as Socket technicians at the customer site to complete the process. When CenturyTel
9 knows it is going to miss a due date, immediate notice to Socket is critical so that the
10 scheduling activity can be rearranged. Otherwise, Socket's customer could incur
11 unnecessary costs from its CPE vendor and Socket's own internal resource planning is
12 jeopardized. The inconvenience, cost, and frustration incurred as a result of last minute
13 delays is damaging to Socket's relationship with its customer.

14 As I note in my Direct Testimony concerning OSS, our experience with
15 CenturyTel is that it has a very poor record of efficient, timely order processing. Because
16 of the numerous delays we routinely experience with CenturyTel, we have had to change
17 our own internal processing and scheduling to assume that there will be a much longer
18 installation process than we experience with other vendors such as SBC or Sprint.
19 Consequently, we have learned from this experience not to schedule such functions as
20 number porting until we are sure the order is complete. Our customers therefore already
21 have to wait an inordinate period of time before they can expect their service from Socket
22 to begin. But those customers also rightfully expect that the scheduled cutover will

1 actually occur on the date we give them, so they plan accordingly. It's very important to
2 Socket and to the customers that we give them as much lead time as possible if the order
3 status changes. This simply cannot happen without pro-active notice from CenturyTel
4 when the order is complete or when problems occur.

5 **Q. How is the CenturyTel Internet Services Customer Portal updated to show if an**
6 **order has been placed in Jeopardy Status?**

7 A. The interface is a manually updated system where updates are entered by
8 personnel in CenturyTel's CLEC Service Center. Socket does not know how the
9 CenturyTel employees in the CLEC Service Center are informed of a change in order
10 status.

11 Adding to the problem is the fact that updates are shown in the comments section
12 for each Order. Quite literally, continual monitoring would require Socket technicians to
13 continuously refresh the order search page and check to see if the comments were
14 updated with a mention of "jeopardy" or "cancelled order" or whatever means
15 CenturyTel uses to describe the situation. It is unreasonable to expect the Socket
16 technicians to spend all their time reviewing the website just in case the order status
17 changes.

18 **Q. What is notification process that is required by the ICA the parties currently are**
19 **operating under?**

20 A. According to Attachment 4 – Provisioning and Ordering, Section 3.7, CenturyTel is
21 required:

22 As soon as identified and unless otherwise agreed, [CenturyTel] shall
23 provide notification electronically of any instances when [CenturyTel's]

1 committed due dates are in jeopardy of not being met by [CenturyTel] on
2 any aspect or feature contained in any [Socket] order.
3

4 This notice provision recognizes both that Socket is entitled to notice as soon as a
5 problem is identified, and that electronic notification is the fastest, most efficient way for
6 CenturyTel to let us know that a problem has occurred. Socket simply seeks to keep this
7 type of notification in place.

8 **Q. Has CenturyTel explained why it is unable to proactively contact Socket?**

9 A. No.

10
11 **ARTICLE XIII - OSS**
12

13 **Q. Why does Socket believe it is entitled to an electronic OSS which has been proposed**
14 **in Article XIII?**

15 A. There are several reasons. The first is that CenturyTel committed to develop a
16 web-based support system during its acquisition of the Verizon properties in which it
17 now operates.¹ CenturyTel's acquisition of the Verizon territories was approved by the
18 Commission based, in part, upon CenturyTel's commitments. During the acquisition,
19 CenturyTel represented that there would no adverse or material impact to the
20 interconnection arrangements in place with Verizon.² In contrast to CenturyTel, Verizon
21 currently has a very extensive, full-featured and well-documented OSS for CLECs to

¹ TM-2002-232, *In the Matter of the Joint Application of GTE Midwest, Inc. d/b/a Verizon Midwest and CenturyTel of Missouri, LLC for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities, and System Located in the State of Missouri, 2) For Issuance of Certificate of Authority to CenturyTel of Missouri, LLC 3) To Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) To Designate CenturyTel of Missouri, LLC as a Telecommunications Carrier Eligible to Receive Federal Universal Service Support*, Direct Testimony of Kenneth M. Matzdorff, at 15-16.

² *Id.*

1 use.³ The lack of a full functioning OSS has an extremely adverse impact on
2 interconnection arrangement with CenturyTel. Also, the current agreement we operate
3 under has provisions for electronic OSS functions.⁴ In CenturyTel's acquisition
4 commitments, they indicated that they were "working toward a web-based solution that
5 should allow for automation to the interconnecting companies."⁵

6 **Q. What interface does Socket use for placing orders with CenturyTel?**

7
8 A. For Local Service Requests, which are used for individual UNEs and resold
9 services, Socket uses the CenturyTel Internet Services Customer Portal, which has only a
10 limited web-based interface for entering LSR orders. This is only a fraction of the
11 functionality that would be considered "standard" from our experience with other
12 carriers.

13 **Q. Is this an automated ordering interface?**

14 A. No. There is no automation involved with this interface. Orders submitted by
15 Socket via this interface must be re-typed by CenturyTel into another system. This is
16 nothing more than a replacement for a facsimile machine. There are no selectable-list
17 fields that would be considered automated. In fact, it wasn't until approximately eleven
18 months after our first, e-mailed LSR order that we were notified that this interface even
19 existed. Beyond ordering, this system presently has no capabilities such as pre-ordering,
20 provisioning, maintenance and repair. In addition, this system only covers LSRs. Access

³ <http://www22.verizon.com/wholesale/business/>

⁴ GTE – AT&T Interconnection Agreement, Section 29, which states, "GTE shall provide the same information, of the same quality, and within the same frames for Pre-Ordering, Ordering/Provisioning, Maintenance/Repairs and Bill to AT&T as GTE provides to itself."

⁵ Case No. TM-2002-232, Direct Testimony of Kenneth M. Matzdorff, at 16.

1 Service Requests (“ASR”) that are used for ordering interconnection and UNE
2 combinations are still ordered via e-mail or facsimile.

3 Releasing CenturyTel from the commitments they made to the Commission four
4 years after the acquisition was approved would be a disservice to the people of the State
5 of Missouri. I believe it is indicative of CenturyTel’s attitude on this matter that they have
6 made no counter-proposals to this Article.

7 **Q. What other reasons do you have for believing Socket is entitled to an electronic**
8 **OSS?**

9 A. The second reason why we feel entitled to the OSS described in Article XIII is
10 due to the issue of parity. Parity means equality with CenturyTel’s internal operations,
11 not with other CLECs. Using the LSR interface as an example, we know that CenturyTel
12 has another system into which these orders are typed. That is the system with which we
13 need functional parity. Currently there is a 48-business hour “order keying” interval at the
14 start of every one of our orders. I doubt this additional 48-business hour interval exists
15 with an internal CenturyTel order.

16 When Socket requests a Customer Service Record as part of the Pre-Order phase,
17 CenturyTel either types that information from their system into a file and e-mails that to
18 Socket or sends a “screen shot” from their internal billing system. The standard
19 provisioning interval for providing this information is 24 hours while CenturyTel has
20 internal access on a real-time basis. This is particularly frustrating as CenturyTel recently
21 implemented a new system for access to this information. When they converted to the

1 new system, CenturyTel made no provisions for CLECs such as Socket to access this
2 new system⁶ despite their contractual obligations to do so.

3 Again, this is not parity. When an ASR is e-mailed to the order group, the
4 returned confirmations and design records are printed from an electronic system of some
5 kind. There is no way for Socket to know what systems CenturyTel has in place to run its
6 business, but our experience to date and common sense dictate that there are systems to
7 which CLECs do not have an equal access nor equivalent access.

8 Another reason we feel an OSS should be put into place is purely recognition of
9 the fact that an automated, web-based system would improve the efficiencies of both
10 companies and reduce the number of errors in the system. It would eliminate the time and
11 errors involved in re-typing of orders, reduce time spent on the phone and on e-mail
12 providing status, and improve speed of operations.

13 **Q. How did Socket arrive at the functionality required of the OSS?**

14 A. The proposed functionality is derived in large part from the OSS attachment
15 approved by the Commission as reasonable and appropriate in Socket's interconnection
16 agreement with SBC Missouri. Some changes were made to reflect differences between
17 CenturyTel's operations and those of SBC Missouri. We also feel it is appropriate to
18 include these requirements as part of the agreement so that CenturyTel will be compelled
19 to adhere to a Commission-approved version of the requirements.

⁶ We are unsure of when the new billing system was put into place but during discussions in the last few months, it has been described as "new" and the use of this system to look up CSRs is a change since the Service Ordering Guide has been put into place.

1 **Q. Why does Socket believe that nine months is an appropriate timeframe for**
2 **development of the electronic interfaces?**

3 A. Since we have no access to information that would enable us to quantify
4 CenturyTel's available resources for developing these applications, we relied on
5 commitments made during the acquisition that indicated these electronic interfaces could
6 be developed in nine months.⁷

7 **Q. Socket proposes that meetings be held to provide progress updates as interfaces are**
8 **developed and that Commission Staff may also participate in the meetings and that**
9 **Socket participate in Operation Readiness Testing. Why is that?**

10 A. We feel it is in everyone's best interest to ensure that the outcomes of the project
11 meet the obligations set forth during development rather than waiting until the end of the
12 project only to discover it doesn't meet the obligations. This is a common practice in
13 software development.

14 **Q. There are several points in Socket's proposed Article XIII that discuss security and**
15 **proper use, can you elaborate?**

16 A. Yes, in an online environment we feel it is important for both companies to be
17 protected from misuse and intrusions into the systems. Socket's proposed contract
18 language will ensure secure and legal use of the systems.

19 **Q. Why does Socket propose the preorder interfaces and functionality?**

20 A. Real time access to pre-order functions and information is critical to the success
21 of an order. The Sprint LSR order system has recognized this is so important that new

⁷ Case No. TM-2002-232, Direct Testimony of Kenneth M. Matzdorff, at 16.

1 LSR orders start with a CSR request which then pre-fills the order. It allows for data
2 validation prior to placing the order. This eliminates many of the errors that occur while
3 ordering. We are proposing a number of functions to allow lookups on information that
4 would be available to a person entering an order at CenturyTel. As mentioned earlier, we
5 feel this is necessary for parity for Socket. Also, Verizon's CLEC ordering capabilities
6 are rather extensive with respect to pre-order information which we feel is part of what
7 CenturyTel committed to providing in the acquisition. In the past, it has been so difficult
8 and slow to get a CSR that we generally put in an order without it. Often the customer
9 has services spread across two or more billing numbers. This results in missing
10 information and, generally, a rejected LSR order and additional delay in providing
11 service to the customer. If a CSR were available to Socket at parity with CenturyTel, we
12 would be able to search for the customer's other accounts. The capability to do live CSR
13 lookups is available from SBC Missouri, Sprint and Verizon.

14 **Q. Why does Socket feel the current ordering and provisioning interface capabilities**
15 **need to be expanded?**

16 A. Socket needs to be able to order all UNEs and combinations of UNEs as defined
17 in Article VII through the interface. Currently this is not possible because the current
18 system only allows certain types of LSR orders. An order for an Enhanced Extended
19 Loop (EEL) must be ordered through an ASR, and all ASR orders must currently be
20 ordered via e-mail. This also impacts any interconnection orders and others which are not
21 included in the limited group of LSR orders that may be ordered through CenturyTel's
22 interface.

1 In addition, there are currently no Post-to-Bill notices. These are necessary for an
2 efficient matching of billing information to the bills which should reduce the amount of
3 billing disputes. As mentioned before, the current system is not automated, but is really
4 more of a simple record keeping and entry form. In order to meet the parity requirement,
5 the interface should be equal to the system it is being re-typed into.

6 **Q. How do the deficiencies in the current preorder, ordering and provisioning systems**
7 **affect Socket's operations?**

8 A. With SBC Missouri and Sprint, the systems are more complete and predictable.
9 This is mostly due to the vast difference in preorder interfaces, but the enhanced
10 capabilities of the ordering and provisioning systems also play a part in this. With
11 customers in CenturyTel areas, we are forced to wait until the circuit is installed and
12 tested before a number port order is placed. This results in a minimum of a week with a
13 circuit that we are paying for but that isn't generating revenue. With the other ILECs, a
14 number port can be ordered for a day or two after the scheduled circuit install date and
15 we have some assurance it will be ready.

16 **Q. In parts 5.5 and 5.6 of Article XIII, there are timing intervals included. Shouldn't**
17 **the wording match those in Article VIII?**

18 A. Article VIII was settled rather late in the negotiations, so sufficient time was not
19 available to alter the wording in Article XIII to match. Article XIII should be changed to
20 the agreed-upon wording in Article VIII.

21 **Q. Why does Socket feel there is a need for electronic interface for Maintenance and**
22 **Repair functions?**

1 A. As mentioned above, to meet the parity requirement, Socket would need access to
2 tickets and their status. If Verizon were still the local carrier, this system would exist;
3 hence, this is another area that is detrimental to CLECs and contrary to CenturyTel's
4 commitments to maintain Verizon's level of service to its CLEC customers. Also, from
5 my past experiences in Quality, a system that collects trouble reports over time is going
6 to allow trends to be spotted, provide a means for making system improvements and
7 assist in learning from past tickets. These are also functions that are provided by the other
8 ILECs with which we do business.

9 **Q. Why is Socket asking for Electronic Billing and Billing Interfaces?**

10 A. Again, this will bring CenturyTel in line with the commitments it made in
11 acquiring Verizon's Missouri territories as mentioned above. These are all functions that
12 are reasonable to expect from an ILEC, including CenturyTel. Electronic billing
13 interfaces allow for more efficient reconciliation of the bills which should reduce billing
14 disputes.

15 **Q. Why does Socket propose that complete documentation and user manuals be**
16 **provided describing how the interfaces operate?**

17 A. This is a pretty standard practice in software development. Without
18 documentation, the interfaces are much less useful. The other ILECs with which we do
19 business and Verizon all have a significant amount of documentation and training
20 available for their interfaces. CenturyTel's current Service Guide only has about two
21 pages devoted to any ordering available to Socket on the CenturyTel Internet Services
22 Customer Portal.

1 **Q. Does this conclude your Direct Testimony?**

2 A. Yes.