

Exhibit No.:
Issues: Rejection of Orders
Witness: Darren L. Dickson
Sponsoring Party: MCImetro Access
Transmission Services, LLC,
Brooks Fiber
Communications of Missouri, Inc.
and Intermedia Communications, Inc.
Type of Exhibit: Direct Testimony
Case Nos.: LC-2005-0080

MCImetro Access Transmission Services, LLC
Brooks Fiber Communications of Missouri, Inc.
and Intermedia Communications, Inc.

DIRECT TESTIMONY

OF

DARREN L. DICKSON

CASE NO. LC-2005-0080

JANUARY 7, 2005

STATE OF Texas)
)
COUNTY OF Collin) SS.

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

MCImetro Access Transmission Services, LLC,)
Brooks Fiber Communications of Missouri, Inc.,) Case No. LC-2005-0080
and Intermedia Communications, Inc.,)
)
Complainants,)
)
vs.)
)
CenturyTel of Missouri, Inc.,)
)
Respondent.)

AFFIDAVIT OF Darren L. Dickson.

COMES NOW Darren L. Dickson, of lawful age, sound of mind and being first duly sworn, deposes and states:

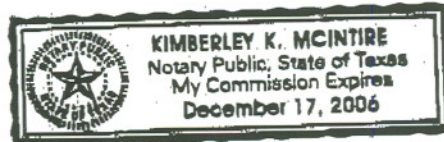
- 1. My name is Darren L. Dickson. I am a Local Network Planner for MCI.
- 2. Attached hereto and made a part hereof for all purposes is my direct testimony in the above-referenced case.
- 3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Darren L. Dickson

SUBSCRIBED AND SWORN TO before me, a Notary Public, this 6th day of January, 2005.


Notary Public

My Commission Expires: December 17, 2006



1 **Q. Please state your name.**

2 A. My name is Darren L. Dickson.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am a Local Network Planner in the Local Switched Network Planning
5 Organization for MCI, Inc.

6 **Q. What is your business address?**

7 A. My business address is 2400 N. Glenville, Richardson, Texas 75082.

8 **Q. What are your current responsibilities for MCI?**

9 A. My responsibilities as a Local Network Planner include developing and
10 maintaining local network architecture plans between MCI's local switches and
11 networks of other carriers, called interconnection trunks or facilities, so that the
12 companies can exchange traffic between their customers.

13 **Q. Please describe your employment history.**

14 A. I have been employed by MCI since 1996 and have held various positions in Long
15 Distance Traffic Engineering, Local Traffic Engineering, and Local Network
16 Planning.

1 **Q. Please describe your educational background.**

2 A. I studied Business Management at Tarrant Community College and Stephen F.
3 Austin State University.

4 **Q. How did you become involved in the matters that are involved in this**
5 **dispute?**

6 A. In February, 2003, I began my efforts to implement MCI's interconnection with
7 CenturyTel of Missouri. Specifically, I was attempting to establish our point of
8 interconnection in Branson, Missouri in order to interconnect the Brooks switch in
9 Springfield, Missouri, with CenturyTel's switch serving the Branson calling area,
10 and additionally to discuss interconnection trunking requirements. First, I
11 contacted Craig Brown of CenturyTel, after receiving his name from Dayna
12 Garvin, who testifies in this case that she had requested a network contact from
13 Guy Miller, her negotiations counterpart at CenturyTel. Mr. Brown informed me
14 that I needed to talk with John McCallister at CenturyTel, so I contacted him.

15 **Q. What did you discuss with Mr. McCallister?**

16 A. I told him that MCI wanted to establish a point of interconnection in Branson,
17 Missouri, including ordering the related interconnection trunks in order to migrate
18 our ISP-bound traffic from existing retail COBRA (acronym for Central Office
19 Based Remote Access) arrangements (which are explained by MCI witness
20 Anderson) to the wholesale interconnection trunks by means of porting

1 (LNP'ing)(LNP is acronym for local number portability) the involved telephone
2 numbers from the CenturyTel switch to the Brooks switch. Mr. McCallister
3 informed me that he could not move forward on these trunking orders and that
4 discussions needed to be held with Guy Miller regarding the use of
5 interconnection trunks to carry ISP-bound traffic.

6 **Q. What is this ISP-bound traffic?**

7 A. It consists of internet communications from residential and business end users,
8 originating on a dial-up basis and delivered to their ISP's internet service system
9 so end users can access databases or websites.

10 **Q. What did you do then?**

11 A. I contacted Dayna Garvin, who testifies in this case that she subsequently placed
12 calls to Guy Miller. Ms. Garvin told me to continue discussions with CenturyTel's
13 network personnel and to have our MCI provisioning center issue orders for the
14 local interconnection trunking and related number porting that we wanted.

15 **Q. Did you do that?**

16 A. Yes. On March 12, 2003 Howard Saltzman, Don Grieco (MCI Network Planning
17 Managers) and I attempted to have a network planning call with Craig Brown of
18 CenturyTel to discuss our requirements and Point of Interconnection location for
19 the Branson, Missouri local calling area. We wanted to provide the necessary
20 information to plan for the interconnection, such as forecasts and network

1 diagrams. However, Mr. Brown said he wasn't interested in discussing such
2 matters and told us to just send in our ASR's.

3 **Q. What is an ASR?**

4 A. An ASR is an industry standard form that contains data elements and usage rules
5 used by telecommunications companies to add, establish, change, or disconnect
6 services or trunks for the purposes of interconnection.

7 **Q. Did MCI submit the ASR's for Branson?**

8 A. Yes. We submitted our initial ASR orders to establish interconnection in
9 Branson, Missouri to CenturyTel on or about April, 16, 2003. Our ASR's were to
10 establish our Point of Interconnection within CenturyTel's Branson central office,
11 which is located within the Branson local calling area.

12 **Q. What is a central office?**

13 A. It is a building in which a telecommunications switch is located.

14 **Q. Did CenturyTel fulfill the initial ASR orders?**

15 A. Yes. CenturyTel completed MCI's initial interconnection orders for Branson,
16 Missouri on or about July 10, 2003. Specifically, CenturyTel provisioned the
17 following interconnection facilities, which remain in place today:

	TYPE	DIRECTION	# OF DS0 CIRCUITS	CLLI CODE
1				
2	911	OUTBOUND	4	BASNMOXADS0
3	LOCAL/INTRA	INBOUND	240	BASNMOXA10T
4	LOCAL/INTRA	OUTBOUND	24	BASNMOXA10T

5 **Q. Were there delays associated with these initial orders?**

6 A. Yes. In late July, early August of 2003, CenturyTel informed us that to pursue
7 interconnection and porting of numbers, CLEC profiles needed to be completed.
8 CenturyTel asserted that the original profiles that MCI had provided to Verizon
9 were no longer valid, and this caused delays while MCI resubmitted the
10 information.

11 **Q. What is a CLEC profile?**

12 A. A CLEC profile is a standard requirement that provides ordering, billing and
13 contact information. These profiles allow for exchange of information between
14 companies to enable business processes to work.

15 **Q. Was this a legitimate request from CenturyTel?**

16 A. No. They had all the information they needed already. But we resubmitted it
17 anyway, in order to eliminate this obstacle.

1 **Q. Was MCI ultimately able to make use of the interconnection in Branson?**

2 A. Yes. MCI successfully LNP'd its first telephone number on August 14, 2003.
3 MCI was also successful in LNP'ing 7 additional telephone numbers in Branson,
4 Missouri by January 15, 2004. As a result, MCI was able to migrate ISP-bound
5 traffic from end users calling these 8 numbers in the Branson local calling area
6 from COBRA facilities to the new interconnection trunks, so that the traffic could
7 be carried from the Brooks switch in Springfield, MO, over MCI's new V.92
8 network (described by MCI witness Anderson), to the MSN (Microsoft Network)
9 internet service system.

10 **Q. What is LNP'ing or porting of numbers?**

11 A. When a customer of one LEC, for example CenturyTel, decides to change
12 providers to another LEC, such as MCI, they want to retain their existing
13 telephone number(s)(the NPA-NXX codes). To meet this need, a telephone
14 number is reassigned, or ported, from the first LEC's switch to the new provider's
15 switch, so that when other customers call the number, the traffic is routed to the
16 switch serving the called party for further routing to its destination.

17 **Q. Did you submit additional orders regarding Branson?**

18 A. Yes. In June, 2004 we submitted ASR's to augment the interconnection facilities
19 in Branson to support new contractual arrangements with AOL to migrate their
20 existing traffic to our new V.92 network. Specifically, we were requesting another

1 480 trunks. We also submitted the LRN (location routing number) and NPA-NXX
2 information in order to LNP the traffic.

3 **Q. Did CenturyTel process these requests?**

4 A. No. Ultimately, on September 21, 2004 Olga Shewmaker of CenturyTel sent
5 Lora Tubs, an MCI provisioner (who had responsibility over implementation of
6 these ASRs) an e-mail stating that Susan Smith, CenturyTel Manager of Carrier
7 Relations, had instructed her to deny our augment orders. CenturyTel's
8 representatives now asserted that Brooks did not have a local interconnection
9 agreement with CenturyTel and that it did not have an approved forecast to
10 support ordering/installing any local trunks. CenturyTel closed the e-mail by
11 stating that the three augment ASR's and the related facilities were being
12 cancelled. A copy of this email is attached hereto as Schedule DD-1.

13 **Q. Did CenturyTel have forecasts from MCI?**

14 A. No, as I have already testified, Craig Brown of CenturyTel had declined the
15 opportunity to discuss such matters, and CenturyTel did not request forecasts
16 prior to this cancellation.

17 **Q. Were there problems with other orders for interconnection with
18 CenturyTel?**

19 A. Yes. On or about April 16, 2004 MCI submitted ASR's to CenturyTel to establish
20 interconnection in Columbia, Missouri in order to interconnect the Intermedia

1 switch in St. Louis, Missouri, with CenturyTel's switches serving the Columbia
2 calling area. We also submitted LRN and NPA-NXX code information to
3 migrate ISP-bound traffic to the requested facilities. On June 10, 2004 Lora Tubbs
4 of MCI received an e-mail from Camille Stevens of CenturyTel stating that MCI's
5 ASR for interconnection trunking in Columbia, MO was on hold for
6 regulatory/legal issues. On July 20, 2004 Camille Stevens of CenturyTel sent an
7 e-mail to Lora Tubbs stating that CenturyTel was waiting for MCI to submit
8 supplemental orders to change the traffic types to IntraLATA Toll only. In the
9 email Camille Stevens confirmed that Olga Shewmaker had previously demanded
10 that MCI make such a change. We were not willing to make this change. We then
11 turned these issues over to Dayna Garvin of our Carrier Management organization
12 for resolution. Copies of the foregoing emails are included in Schedule DD-1.

13 **Q. Has MCI been able to establish interconnection facilities and accomplish**
14 **migration of COBRA traffic with any other ILEC in Missouri, in contrast to**
15 **CenturyTel's refusal?**

16 A. Yes, MCI has successfully LNP'd COBRA traffic on-net in the following rate
17 centers with SBC in Missouri:

18 Kansas City, MO
19 St. Joseph
20 Joplin
21 Farmington
22 St. Charles
23 St. Louis
24 Manchester
25 Ladue
26 Mehlville
27 Sappington
28

1 **Q. Has MCI also been able to accomplish this with SBC and other ILECs in**
2 **other states?**

3 A. Yes.

4 **Q. Are the schedules attached to your testimony MCI business records?**

5 A. Yes.

6 **Q. Were these records made in the regular course of MCI's business, at or near**
7 **the date stated thereon?**

8 A. Yes. These records were prepared and/or received and kept by me and the other
9 MCI personnel named therein and in this testimony in the regular course of our
10 duties for MCI. These are the kinds of records we work with on a daily basis as
11 we communicate with other carriers to establish and maintain interconnection.

12 **Q. Are these records kept under your supervision?**

13 A. Yes.

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

15 A. Yes.