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GTE FLORIDA INCORPORATED
REBUTTAL TESTIMONY OF WILLIAM E. MUNSELL
DOCKET NO. 981173-TP ⁸⁴⁷⁶⁹

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is William E. Munsell. My business address is 600 Hidden Ridge, Irving, TX 75038.

Q. DID YOU FILE DIRECT TESTIMONY IN THIS CASE?

A. Yes, I did.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my testimony is to present GTE's position on interconnection issues that were addressed in Mr. Key's testimony.

Q. TO THE EXTENT THAT THERE IS MORE THAN ONE TANDEM SWITCH IN GTE'S OPERATING TERRITORY, WHY SHOULD SPRINT BE REQUIRED TO ESTABLISH A POINT OF INTERCONNECTION (POI) AT EACH TANDEM?

A. As explained in my Direct Testimony (pp. 22-25), if Sprint was allowed to establish a POI at a single tandem and terminate traffic to end offices sub-tending a second tandem, the signaling and Automatic Message Accounting (AMA) record which is created on a Sprint-originated call would not allow subsequent tandem switching providers to recognize the tandem switching event and thus recover

1 their costs. The attached Exhibit No. WEM-1 illustrates the difference
2 between GTE's position and Sprint's request. This exhibit describes
3 why network providers would not be able to recover their costs under
4 Sprint's proposal.

5

6 **Q. WHO SHOULD BE RESPONSIBLE FOR THE COSTS OF**
7 **SPRINT'S INTERCONNECTING TO GTE'S NETWORK?**

8 A. GTE believes that the issue of cost recovery for interconnection is
9 best left to negotiation. Nevertheless, because Sprint has raised this
10 issue in this arbitration, GTE points out that the FCC's Order 96-325,
11 paragraph 200, states that "to the extent incumbent LECs incur costs
12 to provide interconnection or access under sections 251(c)(2) or
13 251(c)(3), incumbent LECs may recover such costs from requesting
14 carriers." GTE is thus justified in seeking cost recovery from Sprint.

15

16 GTE agrees with Sprint that a meet-point arrangement is a technically
17 feasible manner of interconnection. It does not, however, agree that
18 the FCC's Rule 51.321 defines the parties' responsibility for the costs
19 of constructing interconnection facilities.

20

21 **Q. DOES GTE AGREE THAT SPRINT SHOULD BE PERMITTED TO**
22 **MIX LOCAL, INTRALATA TOLL, AND INTERLATA ACCESS ON A**
23 **SINGLE TRUNK GROUP?**

24 A.. No. Sprint must order a minimum of two trunk groups; the first for
25 local and intraLATA toll traffic not routed to and from an

1 interexchange carrier, and a second for access traffic routed to and
2 from interexchange carriers. At least two trunk groups are required
3 to create AMA terminating access records on the local/intraLATA toll
4 trunk group. The terminating access records enable GTE to bill
5 Sprint for transport and termination for local and intraLATA toll traffic
6 originated by Sprint end users.

7
8 Certain switches in GTE's network are designed so that GTE cannot
9 route terminating traffic from an interexchange carrier to a trunk group
10 where AMA terminating access records are created. The second
11 trunk group (which carries access traffic destined to and from an
12 interexchange carrier), is not measured by GTE, and therefore the
13 terminating traffic from an interexchange carrier is routed to this trunk
14 group.

15

16 **Q. ASSUMING THAT SINGLE TRUNK GROUPS ULTIMATELY WILL**
17 **BE PROVIDED, SHOULD THEY BE AVAILABLE WHEN SPRINT**
18 **CAN MEASURE AND REPORT USAGE, OR SHOULD THEY BE**
19 **AVAILABLE ONLY AFTER GTE CAN MEASURE USAGE?**

20 **A.** They should be provided only after GTE can measure usage. GTE
21 will be the party billing Sprint for local traffic transport and termination
22 and should not be placed in the position of relying on the payor
23 (Sprint) to provide the necessary records to GTE to bill transport and
24 termination charges to Sprint.

25

1 Q. IS MR. KEY CORRECT IN BELIEVING THAT THERE ARE NO
2 TECHNICAL FEASIBILITY ISSUES ASSOCIATED WITH MIXING
3 TRAFFIC ON A SINGLE TRUNK GROUP?

4 A. No. This is not just a traffic identification problem, as Mr. Key seems
5 to believe. (Key Direct Testimony at 39.) My answer above explains
6 why it is not technically feasible for the traffic from the two trunk
7 groups to be combined into one trunk group.

8

9 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

10 A. Yes, it does.

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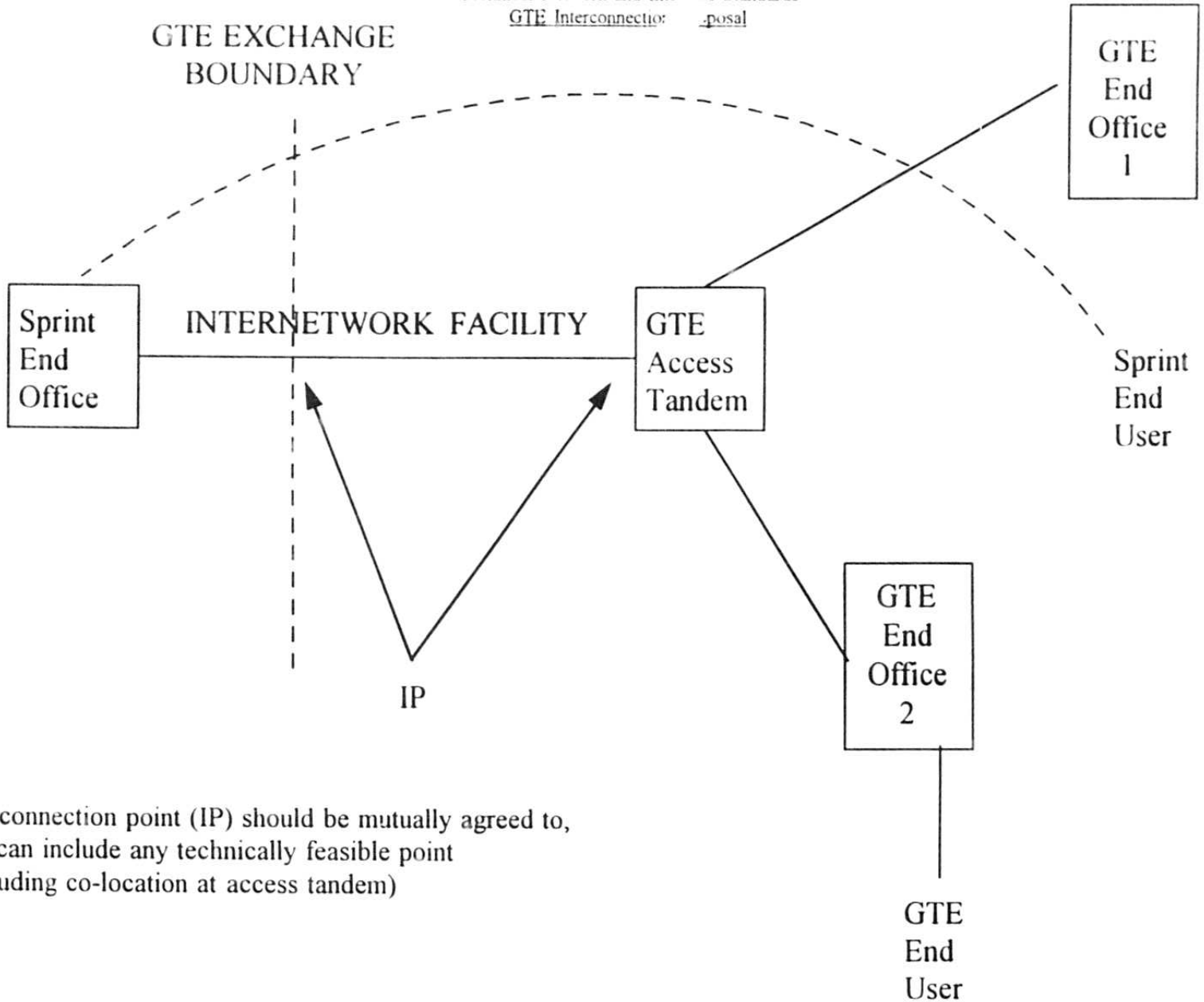
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FPSC-RECORDS/REPORTING

GTE Presentation

Technical Network and Interface Standards

GTE Interconnection Proposal

Call Jurisdiction

GTE Local Calling Area (LCA) for end office 1 includes end office 2.

- I. Call from Sprint end user in calling area of end office 1 to GTE end user in end office 2. This call would route from the Sprint end office, across the inter-network facility to the GTE access tandem for termination to the GTE end user in end office 2.
 - GTE measures the voice trunks riding the inter-network facility for minutes terminating from Sprint's switch at the access tandem, and creates terminating access records.
 - GTE bills Sprint transport (including tandem switching) and termination charges. These charges may be based on Sprint provided percent local usage (PLU) factor, and may be a single composite termination rate.

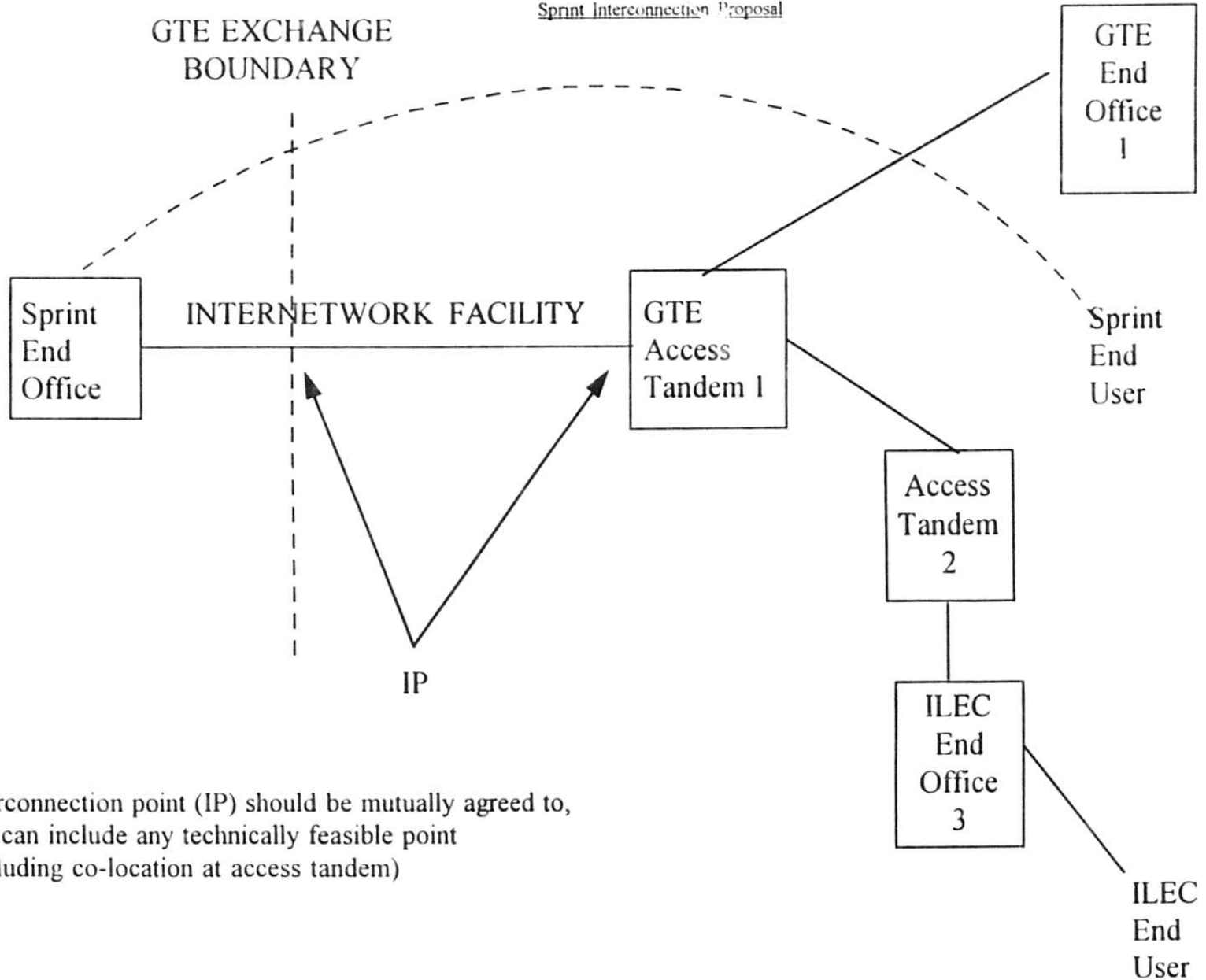
GTE Presentation

Technical Network and Interface Standards

GTE Interconnection Proposal

II. Call from GTE end user in end office 2 to Sprint end user in calling area of end office 1. This call would route through the GTE access tandem, across the inter-network facility to the Sprint switch. Sprint will switch the call for termination to the Sprint end user.

- Unless Sprint has a tandem switch in their network, Sprint has not incurred any tandem switching costs and should not be allowed to charge GTE for functions which Sprint does not perform. Sprint should charge GTE for transport and termination at a rate determined by Sprint's own costs. Charges to GTE may be based on a GTE provided PLU factor.
- Sprint should be allowed to bill GTE for a reasonable amount of transport. Unlike a typical ILEC co-carrier network arrangement, the Sprint switch may be hundreds of miles from the interconnection point. GTE should not be penalized by Sprint's choice of switch deployment, and expects that a surrogate for a reasonable amount of transport would be the lesser of:
 - The distance from the interconnection point to the Sprint switch, or
 - The distance from the interconnection point to the GTE exchange boundary



Interconnection point (IP) should be mutually agreed to, and can include any technically feasible point (including co-location at access tandem)

GTE Presentation

Technical Network and Interface Standards

Sprint Interconnection Proposal

Call Jurisdiction

Calls from end office 1 to end office 3 are intraLATA toll.

- I. Call from Sprint end user in calling area of end office 1 to ILEC end user in end office 3. This call would route from the Sprint end office, across the inter-network facility to the GTE access tandem 1. GTE then would trunk the call to access tandem 2 (which may, or may not, be a GTE access tandem) on common inter-tandem trunks for termination to the ILEC end user served by end office 3.
 - GTE creates terminating access records (AMA record format) on calls terminating to GTE at access tandem 1. The signaling that Sprint's end office is capable of sending, and the industry standard AMA record format, does not allow for the recognition of access tandem 2. The owner of access tandem 2 will perform the tandem switching function, but does not create any record on the trunks from access tandem 1, and therefore has no information by which billing and recovery of costs can be accomplished.

GTE Presentation

Technical Network and Interface Standards

Sprint Interconnection Proposal

- Under industry standard MECAB guidelines, GTE would send a copy of the terminating access record to the LEC owner of the terminating end office. This enables the LEC which performs the terminating end office function to bill the LEC responsible for originating the call (Sprint).
 - Under industry network design, and MECAB practices, the terminating end office always subtends the access tandem where the terminating access record is created.
 - Under the Sprint proposal, access tandem 1 would send the terminating record to a LEC end office which does not subtend access tandem 1. The LEC owner of access tandem 1 does not have any meet point access charge arrangements with the LEC owner of end office 3, since today such traffic routing does not occur on traffic where compensation is based on access records.

The Sprint demand for a single IP in a LATA will result in network providers not being able to recover their costs.

GTE Presentation
Technical Network and Interface Standards
Sprint Interconnection Proposal

- II. Call from ILEC end user in end office 3 to Sprint end user in calling area of end office 1. This call would route through the ILEC end office 3, be tandem switched at access tandem 2, trunked to access tandem 1, and tandem switched at tandem 1 onto the Sprint trunk group to the Sprint end office.
- There are no industry standard access records created on this call which would enable Sprint to bill the LEC responsible for originating the call (the ILEC end office 3 owner). Sprint would “see” the owner of access tandem 1 as the party responsible for payment.