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May 28, 2008

VIA HAND DELIVERY

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RECEIVED-FPSC
08 MAY 28 PM 4:24
COMMISSION CLERK

Re: Docket No. 070736-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Intrado Communications Inc. are an original and 15 copies of the following documents:

- 1. The Rebuttal Testimony of Cynthia Clugy;
2. The Rebuttal Testimony of Thomas W. Hicks;
3. The Rebuttal Testimony of John R. Melcher; and
3. The Rebuttal Testimony of Carey F. Spence- Lenss.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Floyd R. Self

Handwritten routing slip with initials and numbers: OMP, COM 5, CTR, FOR, CDL 2, CSC, NOL, SCR, SJA, SBO, OTH

FRS/amb
Enclosure
cc: Rebecca Ballesteros, Esq.
Parties of Record

DOCUMENT NUMBER: DATE
04523 MAY 28 08
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and U.S. Mail this 28th day of May, 2008.

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Charlene Poblete, Esq.
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Tallahassee, FL 32399-0850

Mr. Michael Barrett
Florida Public Service Commission
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Floyd R. Self

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
Docket No. 070736-TP
Petition of Intrado Communications Inc. Pursuant to Section 252(b) of the
Communications Act of 1934, as amended, to Establish an Interconnection
Agreement with BellSouth Telecommunications, Inc., d/b/a AT&T Florida

REBUTTAL TESTIMONY OF CYNTHIA CLUGY

May 28, 2008

SECTION I - INTRODUCTION

Q: PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS FOR THE RECORD.

A: My name is Cynthia Clugy. My business address is 1601 Dry Creek Drive, Longmont, CO, 80503. I am employed by Intrado Communications Inc. ("Intrado Comm") as a Consultant to Intrado Comm's Government and Regulatory Affairs department.

Q: PLEASE DESCRIBE YOUR RESPONSIBILITIES FOR INTRADO COMM.

A: I am responsible for various projects for Intrado Comm's Government and Regulatory Affairs group. Specifically, I am a part of Intrado Comm's Section 251 negotiations team where I serve as a telecommunications subject matter expert. As a member of Intrado Comm's Section 251 team, I am responsible for the review and revision of incumbent template agreements necessary to meet Intrado Comm's interconnection needs to provide

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1 competitive 911 services to Public Safety Answering Point ("PSAP")
2 customers. I also have participated in the negotiations with AT&T regarding
3 the interconnection agreement at issue in this proceeding.

4 **Q: WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

5 **A:** The purpose of my rebuttal testimony is to address Issue 6.

6 **Q: PLEASE EXPLAIN INTRADO COMM'S PROPOSED LANGUAGE**
7 **REGARDING THE PROCESS FOR AT&T ORDERING SERVICES**
8 **FROM INTRADO COMM.**

9 **A:** While AT&T's proposed language contains detailed provisions setting forth
10 the process for Intrado Comm to order services and facilities from AT&T, the
11 language does not address how AT&T will order services from Intrado
12 Comm. As co-carriers, each Party will be purchasing services from the other
13 and thus each Party should be aware of the process to order services and
14 facilities from the other Party. Intrado Comm has therefore included language
15 addressing its ordering process in the interconnection agreement.

16 **Q: CAN YOU PROVIDE FURTHER DETAIL ON INTRADO COMM'S**
17 **ORDERING PROCESS?**

18 **A:** Intrado Comm will ultimately be providing web-based access to all
19 telecommunications service providers to order services from Intrado Comm,
20 including access to Intrado Comm's Intelligent Emergency Network®. The
21 process is detailed in Exhibit No. ____ (Clugy, Rebuttal Exhibit CC-2).

22 **Q: IS INTRADO COMM'S ORDERING PROCESS CONSISTENT WITH**
23 **CURRENT INDUSTRY PRACTICES?**

1 **A:** While Intrado Comm does not require interconnecting parties to enter all of
2 the codes and entries typically required when connecting to an ILEC via its
3 standard Access Service Request (“ASR”) process, the information required
4 by Intrado Comm includes fields normally contained on an ASR.

5 **Q: HAS AT&T REFUSED TO USE INTRADO COMM’S ORDERING
6 PROCESSES?**

7 **A:** No, AT&T has not refused to use Intrado Comm’s ordering process or
8 indicated any disagreement with Intrado Comm’s proposed language. Rather,
9 it appears AT&T is unwilling to accept the language in a Section 251(c)
10 interconnection agreement based on AT&T’s view that it is not appropriate to
11 address this issue in a Section 251(c) interconnection agreement.

12 **Q: IS INTRADO COMM’S PROPOSED LANGAUGE APPROPRIATE
13 FOR A SECTION 251(c) INTERCONNECTION AGREEMENT?**

14 **A:** Yes. The interconnection agreement sets forth the Parties’ reciprocal
15 interconnection obligations and the terms and conditions governing their co-
16 carrier relationship. Intrado Comm’s ordering process should be set forth in
17 the interconnection agreement just as it is for the AT&T ordering process.

18 **Q: DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?**

19 **A:** Yes.

E911 Port Service Request Guidelines

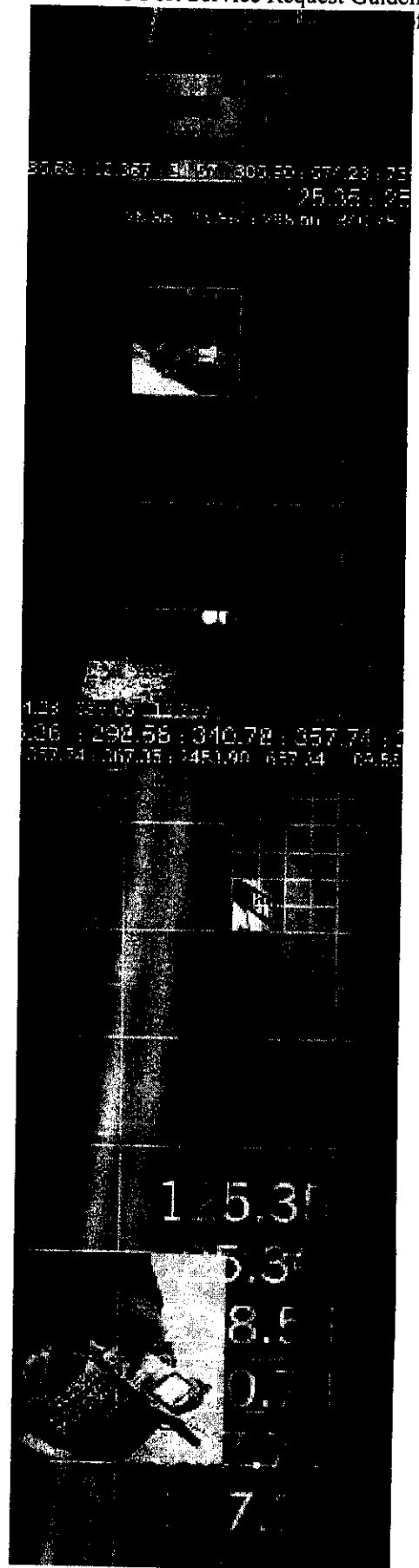
Version 2008.05.15



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Table of Contents

Port Service Request (PSR) Instructions and Field Descriptions	1
PSR Form Submittal Instructions	1
PSR Field Descriptions	1
Administrative Information Section of PSR Form.....	1
Billing Section of PSR Form	5
Contact Section of PSR Form	6
Trunking/Connectivity Section of PSR Form.....	8

Port Service Request (PSR) Instructions and Field Descriptions

PSR Form Submittal Instructions

1. Complete the Port Service Request (PSR) form for each Point of Interface (POI) you will be connecting to.
2. Submit the completed PSR form to IENVprovisioning@intrado.com.
3. Upon receipt of the completed PSR form, Intrado will review the information provided and will reply within two (2) business days as follows:
 - Provide confirmation of receipt of the properly completed PSR form
 - Provide the Intrado Facility Point Codes (if applicable – applies to SS7 Connectivity only)
 - If the form is not properly completed, the confirmation will indicate missing or incorrect data and what additional or corrected information is needed. Please resubmit a properly completed form within two (2) business days (or sooner).
4. Once your circuit is delivered to the POI location, resubmit the PSR form as 'version 2' with your requested test date and the Exchange Company Circuit ID fields populated on the 'version 2' submittal.
5. Once the cross connect is completed, Intrado will notify the TSP of completion within five (5) business days of the 'version 2' submittal and schedule initial testing.
6. Please forward any questions to IENVprovisioning@intrado.com.

PSR Field Descriptions

Administrative Information Section of PSR Form

PON: Purchase Order Number. Identifies the Telephone Service Providers (TSP's) unique purchase-order or requisition number that authorizes the issuance of this request or supplement.

USAGE – The field is required.

DATA CHARACTERISTICSCHARACTERISTICS – 16 alpha numeric characters

EXAMPLE: 824Z9

VER: Version Identification. Identifies the TSP version number.

USAGE – The field is required.

DATA CHARACTERISTICSCHARACTERISTICS – Up to 2 alpha numeric characters

EXAMPLE: A2

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

D/TSENT: Date Sent. Identifies the date the Port Service Request is sent by the TSP.

Two-Digit Month (01-12)

Two-Digit Date (01-31)

Four-Digit Year (0000-9999)

USAGE – The field is required.

DATA CHARACTERISTICSCHARACTERISTICS – 8 numeric characters (including 2 hyphens)

EXAMPLE: 05-22-2007

DDD: Desired Due Date. Identifies the TSP's expected delivery of CFA (Tie Down) .

Two-Digit Month (01-12)

Two-Digit Date (01-31)

Four-Digit Year (0000-9999)

USAGE – The field is required.

DATA CHARACTERISTICSCHARACTERISTICS – 8 alpha numeric characters (including 2 hyphens)

EXAMPLE: 03-02-2008

PROJECT: Project Identification. Identifies the project with which the request is to be associated. Examples of the use of this field would be relating multiple requests especially for an initial cutover.

USAGE – The field is optional.

DATA CHARACTERISTICSCHARACTERISTICS – Up to 16 alpha numeric characters

EXAMPLE: MS736119

PPTD: Test Date. Identifies the pre-negotiated test date for the start of testing. Must be greater than the desired due date.

USAGE – The field is optional.

DATA CHARACTERISTICSCHARACTERISTICS – 8 alpha numeric/characters (including 2 hyphens)

VALID ENTRIES:

U.S. Standard

Metric Format

Two -Digit Month (01-12)

Two -Digit Century (00-99)

Two-Digit Day (01-31)

Two-Digit Year (00-99)

Four-Digit Year (0000-9999)

Two-Digit Day (01-31)

EXAMPLE: 03-22-2007

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

NOR: Number of Requests. Identifies both specific and total quantity of requests within a group of Requests being ordered.

USAGE – The field is required

DATA CHARACTERISTICS – 4 numeric characters

EXAMPLE: 01 of 06

ACT: Activity. Identifies the activity involved in this request.

USAGE – The field is required.

DATA CHARACTERISTICS – 1 alpha character

VALID ENTRIES

New installation or increase in capacity

Disconnection or decrease in capacity

Change CAMA to SS7, ISDN, or IP

EXAMPLE: N

SUP: Supplement Type. A supplement is any new iteration of a PSR. The entry in the SUP field identifies the reason for which the supplement is being issued.

USAGE – The field is conditional. Not for use on an initial request.

DATA CHARACTERISTICS – 1 numeric character

VALID ENTRIES:

Cancel – Indicates that the pending order is to be cancelled in its entirety.

New Due Date – Indicates that the pending order requires only a change of due date.

Other – Any other change to the request.

Correction – Indicates that this request is being issued to correct a previous request for which a firm confirmation has not been received.

EXAMPLE: 4

EXP: Expedite. Indicates that expedited treatment is requested and any charges generated in provisioning this request (e.g., additional engineering charges or labor charges if applicable) will be accepted.

USAGE – The field is optional.

DATA CHARACTERISTICS – 1 alpha character

VALID ENTRIES:

Y = Expedite Charges Authorized

EXAMPLE: Y

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

CKR: TSP Circuit Reference (primary/secondary). Identifies the circuit number or range of circuit numbers used by the TSP.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 53 alpha/numeric characters.

EXAMPLE: 0002/DF88ES

ECCKT. Exchange Company Circuit ID (Primary/Secondary). Identifies the LEC local loop circuit ID or multiple circuit IDs.

USAGE – The field is required on final draft of order (Version 2).

DATA CHARACTERISTICS – Up to 53 alpha/numeric characters.

EXAMPLE: 0002/DF88ES

RORD. Related Order Number – Identifies a related AP order number.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 17 alpha/numeric characters

EXAMPLE: C456895

RPON: Related Purchase Order Number. Identifies the PON of a related Port Service Request.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 16 alpha/numeric characters

EXAMPLE: 824Z9

POI SITE: Point of Interface Site. The location of the POI site that the TSP is connecting into. Each TSP must connect to a minimum of two POI locations. For a list of POI locations, go to Intrado's IEN Interconnection web page at www.intradocomm.com.

USAGE – The field is required.

DATA CHARACTERISTICS – City: 32 alpha characters, State: 2 alpha characters

EXAMPLE: City: Denver; State: CO

POI CLLI CODE: Point of Interface Site CLLI Code. The CLLI code of the POI site you are connecting into. For a list of POI CLLI Codes, go to Intrado's IEN Interconnection web page at www.intradocomm.com.

USAGE – The field is required.

DATA CHARACTERISTICS – 11 alpha/numeric characters

EXAMPLE: WCHSOHGR0ED

REMARKS: Identifies a free flowing field which can be used to expand upon and clarify other data on this form.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 186 alpha/numeric characters

EXAMPLE: DISC OF FIRST CIRCUIT IN GROUP

Billing Section of PSR Form

BILLNM: Billing Name. Identifies the name of the person, office, or company to whom the TSP has designated that the bill be sent.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 25 alpha/numeric characters

EXAMPLE: XYZ CORPORATION

SBILLNM: Secondary Billing Name. Identifies the name of a department or group within the designated BILLNM entry.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 25 alpha/numeric characters

EXAMPLE: TSPCOUNTS RECEIVABLE

STREET: Street Address. Identifies the street of the billing address associated with the billing name.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 25 alpha/numeric characters

EXAMPLE: 125 E MAIN STREET

FLOOR: Identifies the floor for the billing address associated with the billing name.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 3 alpha/numeric characters

EXAMPLE: 32

ROOM: Identifies the room for the billing address associated with the billing name.

USAGE – The field is optional.

DATA CHARACTERISTICS – Up to 6 alpha/numeric characters

EXAMPLE: 1K151A

CITY: Identifies the city, village, township, etc. of the billing address associated with the billing name.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 25 alpha/numeric characters

EXAMPLE: LONGMONT

STATE: State/Province. Identifies the two character postal code for the state/province of the billing address associated with the billing name.

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

USAGE – The field is required.

DATA CHARACTERISTICS – 2 alpha/numeric characters

EXAMPLE: CO

ZIP CODE: Identifies the zip code or zip+4 of the billing address associated with the billing name.

USAGE – The field is required.

DATA CHARACTERISTICS – 12 alpha/numeric characters

EXAMPLE: 07039 or 08854-1234

BILLCON: Billing Contact. Identifies the name of the person or office to be contacted on billing matters.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 15 alpha/numeric characters

EXAMPLE: JANE T DOE

TEL NO: Telephone Number. Identifies the telephone number of the billing contact.

USAGE – The field is required.

DATA CHARACTERISTICS – 14 (10 digit + 4 digit extension) alpha/numeric characters (including 3 hyphens)

EXAMPLE: 201-555-3400-2223

Contact Section of PSR Form

INIT: Initiator Identification. Identifies the TSP's employee who originated this request.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 15 alpha/numeric characters

EXAMPLE: JOHN SMITH

TEL NO: Telephone Number. Identifies the telephone number of the TSP's employee who initiated the request.

USAGE – The field is required.

DATA CHARACTERISTICS – 14 (10 digit + 4 digit extension) alpha/numeric characters (including 3 hyphens)

EXAMPLE: 201-555-3400-2225

FAX NO: Fax Number. Identifies the fax number of the TSP's employee who initiated the request.

USAGE – The field is optional.

DATA CHARACTERISTICS – 10 digits (including 2 hyphens)

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

EXAMPLE: 201-981-3500

ENGINEERING: Engineering Identification

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 15 alpha/numeric characters

EXAMPLE: JOHN SMITH

TEL NO: Telephone Number. Identifies the telephone number of the Engineering Contact.

USAGE – The field is required.

DATA CHARACTERISTICS – 14 (10 digit + 4 digit extension) alpha/numeric characters (including 3 hyphens)

EXAMPLE: 201-555-3400-2225

FAX NO: Fax Number. Identifies the fax number of the Engineering Contact.

USAGE – The field is optional.

DATA CHARACTERISTICS – 10 digits (including 2 hyphens)

EXAMPLE: 201-981-3500

TEST: Tester Identification

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 15 alpha/numeric characters

EXAMPLE: JOHN SMITH

TEL NO: Telephone Number. Identifies the telephone number of Tester.

USAGE – The field is required.

DATA CHARACTERISTICS – 14 (10 digit + 4 digit extension) alpha/numeric characters (including 3 hyphens)

EXAMPLE: 201-555-3400-2226

FAX NO: Fax Number. Identifies the fax number of the Tester.

USAGE – The field is optional.

DATA CHARACTERISTICS – 10 digits (including 2 hyphens)

EXAMPLE: 201-981-3500

SITE: Site Contact Tester Identification

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 15 alpha/numeric characters

EXAMPLE: JOHN SMITH

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

TEL NO: Telephone Number. Identifies the telephone number of the TSP's Site Contact.

USAGE – The field is required.

DATA CHARACTERISTICS – 14 (10 digit + 4 digit extension) alpha/numeric characters (including 3 hyphens)

EXAMPLE: 201-555-3400-2226

FAX NO: Fax Number. Identifies the fax number of the TSP's Site Contact.

USAGE – The field is optional.

DATA CHARACTERISTICS – 10 digits (including 2 hyphens)

EXAMPLE: 201-981-3500

NOC: Network Operations Center. Identifies the NOC Name for future trouble reporting of this connectivity.

USAGE – The field is required.

DATA CHARACTERISTICS – 25 alpha/numeric characters

EXAMPLE: XYZ NOC

TEL NO: Telephone Number. Identifies the NOC Telephone number for future trouble reporting of this connectivity.

USAGE – The field is required.

DATA CHARACTERISTICS – 10 digits (including 2 hyphens)

EXAMPLE: 201-981-3500

NOC EMAIL ADDRESS: Network Operations Center Email Address. Identifies the email address of the TSPs NOC.

USAGE – The field is required.

DATA CHARACTERISTICS – 50 alpha/numeric characters

EXAMPLE: XYZCORPNOC@XYZ.COM

Trunking/Connectivity Section of PSR Form

Connectivity choices for connecting to Intrado's POIs. (Note: SS7 is the preferred method of connectivity.)

SS7 via VeriSign

SS7 via alternate SS7 provider

CAMA

DSO: Identifies number of DS 0s being used. (Note: Minimum requirement is two.)

USAGE – The field is required.

DATA CHARACTERISTICS – 2 numeric digits.

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

EXAMPLE: 02

HOM: Homed. Specify whether the connection from your End Office single (S), double (D) or triple (T) homed.

USAGE – The field is required.

DATA CHARACTERISTICS – 1 alpha character.

EXAMPLE: D

TRFTYP: Traffic Type. Identifies the type of Traffic, i.e., Wireline (WRLN), Wireless (WRLS) or Voice over IP (VOIP)..

USAGE – The field is required.

DATA CHARACTERISTICS – 4 alpha numeric characters

EXAMPLE: WRLN

TCIC: Trunk Circuit Identification Code. Identifies a specific trunk for which CCS is being performed.

USAGE – The field is required.

DATA CHARACTERISTICS – 11 alpha/numeric characters

EXAMPLE: 02345-02347

TRGP: Trunk Group. Identifies trunk group as either Selective Routing (SR) or Trunk only routing (TO).

USAGE – The field is required.

DATA CHARACTERISTICS – 2 alpha characters

EXAMPLE: TO

PSAP: Public Safety Answering Point. Identifies the Default Public Safety Answering Point to be used in the trunk group.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 25 alpha/numeric characters

EXAMPLE: HOWARD COMM CTR

NPAT: NPA per trunk group. If multiple NPAs are used, this field identifies the NPA per Trunk Group.

USAGE – The field is required if using CAMA and multiple NPAs only.

DATA CHARACTERISTICS – Up to 30 alpha/numeric characters

EXAMPLE: TR1=NPA212

CFA: Connecting Facility Assignment (TIE-DOWN). Identifies the provider carrier system and channel to be used from a Wideband Analog, High Capacity, or Optical Network facility when the customer has assignment control.

E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

USAGE – The field is required on final draft of order (Version 2)

DATA CHARACTERISTICS – Up to 42 alpha/numeric characters

EXAMPLE: 101/T1/3/BSTNMAGTCGO/BSTNMAMTCG0

CSL: Customer Switch Location. Identifies the CLLI Code of the customer's switch.

USAGE – The field is required.

DATA CHARACTERISTICS – 11 alpha/numeric characters

EXAMPLE: CHCGILWRDS0

CSPC: Customer Signaling Point Code. Identifies the electronic address of the customer's signaling point (SP) or signaling transfer point (STP) in a CCS network.

USAGE – The field is required for SS7 connectivity.

DATA CHARACTERISTICS – 11 numeric characters (including 2 hyphens)

EXAMPLE: 249-255-101

NENA: NENA ID of Telephone Service Provider. Identifies the NENA ID.

USAGE – The field is required.

DATA CHARACTERISTICS – Up to 6 alpha/numeric characters

EXAMPLE: ITRDO

IMP: Implied NPA. Identifies the implied NPA.

USAGE – The field is required for CAMA connectivity.

DATA CHARACTERISTICS – 3 digits

EXAMPLE: 303

INF: Information Digit. Identifies if an information digit is being used.

USAGE – The field is required if using CAMA only.

DATA CHARACTERISTICS – One alpha character (Y) Yes or (N) No

EXAMPLE: N

ISUP: ISUP Parameter. Identifies the ISUP Parameter Used. (See ISUP Parameter Table on next page.)

USAGE – The field is required for SS7 connectivity.

DATA CHARACTERISTICS – Up to 6 alpha/numeric characters

EXAMPLE: NCASA1

Reference Tables for ISUP Parameter

ISUP Parameter	OLI	CpCAT	Called Party	Calling Party	Charge	Generic Digits
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E911 Port Service Request Guidelines Port Service Request (PSR) Instructions and Field Descriptions

Option for wireline/wireless calls	Wireless	Emergency	Number	Number	Number	Parameter
NCAS A1	NO	YES	911	ANI/pANI	ANI/pANI	BLANK
NCAS A2	NO	YES	911	ANI/pANI	-	BLANK
NCAS A3	NO	YES	911	-	ANI/pANI	BLANK

ISUP Parameter Option for wireless calls	OLI Wireless	CpCAT Emergency	Called Party Number	Calling Party Number	Charge Number	Generic Digits Parameter
CAS A1	YES	YES	911	CBN	CBN	ESRD
CAS A2	YES	YES	911	CBN	-	ESRD
CAS A3	YES	YES	911	-	CBN	ESRD
CAS E1	YES	YES	ESRD	CBN	CBN	BLANK
CAS E2	YES	YES	ESRD	CBN	-	BLANK
CAS I1	YES	YES	ESRD	CBN	CBN	ESRD
CAS I2	YES	YES	ESRD	CBN	-	ESRD