



BellSouth Telecommunications, Inc.
601 W. Chestnut Street
Room 407
Louisville, KY 40203

Mary.Keyer@BellSouth.com

Mary K. Keyer
General Counsel/Kentucky

502 582 8219
Fax 502 582 1573

March 7, 2007

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

RECEIVED

MAR 07 2007

PUBLIC SERVICE
COMMISSION

Re: BellSouth Telecommunications, Inc., Complainant v. Brandenburg
Telephone Company, Defendant
PSC 2006-00546

Dear Ms. O'Donnell:

Enclosed for filing in this case are the original and four (4) copies of BellSouth's Responses to Brandenburg's Data Requests filed February 8, 2007.

Portions of the responses are confidential and, pursuant to 807 KAR 5:001, § 7, BellSouth files herewith its Petition for Confidentiality requesting that the Commission afford confidentiality to that material. Specifically, BellSouth requests confidential treatment of Attachment A to Item 3, a portion of the Attachment to Item 5, the Attachment to Item 6, a portion of Attachment B to Item 13 and Attachment C to Item 13.

The Responses are hand-delivered today to Brandenburg's counsel.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

670209

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:)
)
)
BELLSOUTH TELECOMMUNICATIONS, INC.)
)
Complainant)
)
v.)
)
BRANDENBURG TELEPHONE COMPANY)
)
Defendant)

MAR 07 2007

PUBLIC SERVICE
COMMISSION

Case No.:
2006-00546

BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR CONFIDENTIALITY

Petitioner, BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky ("AT&T Kentucky"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to KRS 61.878 and 807 KAR 5:001, § 7, to classify as confidential the highlighted information contained in AT&T Kentucky's Responses to Brandenburg's First Set of Data Requests, specifically Attachment A to Item No. 3, Attachment to Item No. 5, the attachment to Item No. 6 and Attachments B and C to Item No. 13, filed herewith. The material that is highlighted contains information that is personal information or specific to Brandenburg Telephone Company in the conduct of its business with AT&T Kentucky.

The Kentucky Open Records Act exempts certain information from the public disclosure requirements of the Act, including information of a personal nature, certain

commercial information, and also information the disclosure of which is prohibited by federal law or regulation. KRS 61.878(1)(c)1 and 61.878(1)(a)(k).

To qualify for the personal information exemption and, therefore, keep the information confidential, a party must establish that it is “information of a personal nature where the public disclosure would constitute a clearly unwarranted invasion of personal privacy....” KRS 61.878(1)(a); 807 KAR 5:001 § 7. The attachment to Item No. 5 of AT&T Kentucky’s Responses to Brandenburg’s First Set of Data Requests contains information concerning a detailed study of traffic on trunk groups over which AT&T Kentucky terminates traffic to Brandenburg. The information contained in that attachment includes personal calling and called telephone number information and the minutes of use for each call, and Attachment B to Item No. 13 also contains personal calling number information. The information identified is personal information for which disclosure of such would “constitute a clearly unwarranted invasion of personal privacy,”¹ and should be protected as confidential.

To qualify for the commercial information exemption and, therefore, keep the information confidential, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors and the parties seeking confidentiality if openly discussed. KRS 61.878(1)(c)1; 807 KAR 5:001 § 7. The Commission has taken the position that the statute and rules require the party to demonstrate actual competition and the likelihood of competitive injury if the information is disclosed.

All of the information for which AT&T Kentucky seeks confidentiality in this petition contains customer-specific information, specifically, information regarding the

¹ *Kentucky Bd. Of Examiners v. Courier-Journal*, 826 S.W.2d 324, 327 (Ky. 1992).

minutes of use and/or the amount of money exchanged between the Parties.

Attachment A to Item No. 3 contains information regarding the amount of money which AT&T Kentucky compensated Brandenburg for terminating ACS traffic through its Settlements Process. The attachment to Item No. 5 contains information concerning a detailed study of traffic on trunk groups over which AT&T Kentucky terminates traffic to Brandenburg. The attachment to Item No. 6 contains information regarding traffic volumes indicated by Brandenburg's CABS billing system and BellSouth's settlements system. Attachment B to Item No. 13 contains information regarding Brandenburg's processing of AT&T Kentucky's EMI records for a sample period. And Attachment C to Item No. 13 contains information regarding the amount of money which Brandenburg invoices AT&T Kentucky and AT&T Kentucky pays to Brandenburg for Covered CMRS Provided Traffic pursuant to the CMRS Agreement among BellSouth, the Rural LECs and the CMRS Providers. All of this information is specific to Brandenburg Telephone Company in the conduct of its business with AT&T Kentucky.

The information provided in these attachments is considered confidential business information related to the competitive interests of AT&T Kentucky and Brandenburg Telephone Company that is proprietary and confidential to AT&T Kentucky and Brandenburg. These documents are not publicly available and disclosure of this data would impair the competitive business and cause harm to AT&T Kentucky and Brandenburg Telephone Company. Public disclosure of the identified information would provide competitors, namely CLECs and other CMRS Providers, with an unfair competitive advantage.

The Commission should also grant confidential treatment to the information for the following reasons:

(1) The information for which AT&T Kentucky is requesting confidential treatment is not known outside of AT&T Kentucky;

(2) The information is not disseminated within AT&T Kentucky and is known only by those of AT&T Kentucky's employees who have a legitimate business need to know and act upon the information;

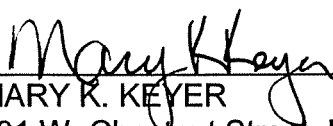
(3) AT&T Kentucky seeks to preserve the confidentiality of this information through appropriate means, including the maintenance of appropriate security at its offices; and

(4) By granting AT&T Kentucky's petition, there would be no damage to any public interest.

In addition, information provided to the Commission in Attachment A to Item No. 3, the attachment to Item No. 6 and Attachment C to Item No. 13 concerning specific customers is customer proprietary network information ("CPNI") and should not be publicly disclosed without the approval of the individual customers. Disclosure of customer-specific information is subject to obligations under Section 222 of the Communications Act of 1937 as amended by the Telecommunications Act of 1996. Federal law imposes the obligation to maintain the confidentiality of such information from public disclosure when the disclosure of such information or records is prohibited by federal law or regulation. Therefore, because CPNI is protected from disclosure by federal law, this information should be afforded proprietary treatment.

For the reasons stated herein and in its Order dated March 31, 2006, in Case No. 2005-00533, SouthEast Telephone, Inc., v. BellSouth Telecommunications, Inc., the Commission should grant AT&T Kentucky's request for confidential treatment of the identified information.

Respectfully submitted,




MARY K. KEYER
601 W. Chestnut Street, Room 407
P. O. Box 32410
Louisville, KY 40232
(502) 582-8219
mary.keyer@bellsouth.com

COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.,
D/B/A AT&T KENTUCKY

CERTIFICATE OF SERVICE -- KPSC 2006-00546

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by hand-delivery, this 7th day of March, 2007.

John E. Selent
Holly C. Wallace
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
John.Selent@dinslaw.com
Holly.Wallace@dinslaw.com



Mary K. Keyet

REQUEST: State with specificity the date BellSouth first notified Brandenburg that it would begin terminating "ACS Traffic" to Brandenburg.

RESPONSE: BellSouth cannot state with specificity when this occurred. It would have been on or about the effective date of BellSouth's first Area Plus tariff, which was July 1, 1996. By the beginning of the relevant period in April 2002, Brandenburg had been receiving settlement statements from BellSouth indicating payments for ACS Traffic for at least three to four years, according to Brandenburg's own assertion in its Answer to the Complaint. Brandenburg alleges it first received payment from BellSouth for ACS Traffic in December 1997.

REQUEST: State with specificity when BellSouth first started terminating "ACS Traffic" to Brandenburg.

RESPONSE: BellSouth cannot state with specificity when this occurred. See AT&T Kentucky's Response to Item No. 1.

REQUEST: In its Complaint, BellSouth identifies ACS Traffic as "Area Calling Service traffic." In its reply to Brandenburg's Answer, however, BellSouth states: "The term 'ACS Traffic' as used in this docket is a generic term that includes Area Plus traffic and should not be confused with BellSouth's traditional Area Calling Service plans set forth in BellSouth's Price List." Please explain the apparent discrepancy between these two statements and identify with specificity and in detail the traffic (other than CMRS traffic) for which BellSouth alleges it overpaid Brandenburg.

RESPONSE: There is no discrepancy between the two terms. As used on the settlements statements (attached hereto as Attachment A), area calling service ("ACS") is a generic term that includes optional calling plans such as Area Plus, Business Plus and Area Calling Service.

The traffic for which BellSouth made double payments was traffic that originated with BellSouth's area calling service(s) customers and was delivered to Brandenburg for termination. Attachment A to this request provides copies of SN-642-NET settlements statements in which the payments for this traffic are identified as "ACS." BellSouth notes that this information is confidential and proprietary. Accordingly, BellSouth is filing a Confidentiality Petition, pursuant to KRS 61.878 and pertinent regulations, simultaneously with these responses so that the Kentucky Public Service Commission may enter an appropriate order to protect the confidential information. A legend describing the line item entries used on the SN-642-NET settlements statements is provided in Attachment B.

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 3
ATTACHMENT A

**ATTACHMENT A TO DATA REQUEST,
ITEM NO 3**

ENTIRE DOCUMENT IS REDACTED

**26 page document that contains
"SN-642-NET Settlement Statements"**

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 3
ATTACHMENT B

**ATTACHMENT B TO DATA REQUEST,
ITEM NO 3**

Line Items on SN-642-NET

Line Item 1. Prior Statement Balance

Line Item 2. ACS (SN-642-ACS): Net ACS settlement due BST (payment to Brandenburg in this example, because the number is negative).

Line Item 3: CABS (SN-642-CABS): Net IXC settlement due BST (or Brandenburg if a negative number), the result of business agreements between BellSouth, Brandenburg, and IXCs. This does not include Brandenburg bills that are presented to AT&T Kentucky in a CABS format. That billing is included in Line Item 6.

Line Item 4: Misc. (SN-642-C): Net miscellaneous settlement(s) due BST (or Brandenburg if a negative number), i.e., Operator Services, Local Directory Assistance, Private Line.

Line Item 5: PCP (SN-642-ACCESS): Net Revenue due BST (or Brandenburg if a negative number) for InterState IntraLATA toll netted against InterState IntraLATA access, and Billing and Collections due Brandenburg.

Line Item 6: PCP (SN-642-PCP): Net Revenue due BST (or Brandenburg if a negative number) for IntraState IntraLATA toll netted against IntraState IntraLATA access, and Billing and Collections due Brandenburg.

Line Item 6 is where the double payment for ACS traffic occurs if the ACS payment is still being input through the settlements system. All terminating traffic on the CTTG is billed to BellSouth at full terminating access rates in Line Item 6. Because payment for the ACS Traffic also appears on the netting statement at Line Item 2, payment for that traffic is being made twice.

Line Item 7. Total Current Month Activity: Sum of items 2 through 6

Line Item 8: Payment Applied: Previous month's payment applied

Line Item 9: Net Proceeds: Net payment to ICO (if a negative number) or to BellSouth (if a positive number).

REQUEST: Please identify any and all trunk groups over which BellSouth terminates traffic to Brandenburg.

RESPONSE: The trunk groups between BellSouth and Brandenburg Telephone are designated by the following alphanumeric trunk group identifiers: AF111053 (Common Transport Trunk Group or CTTG), AF128757 (EAS trunk group from Owensboro), and AF146667 (EAS trunk group from Rose Terrace).

REQUEST: In its reply to Brandenburg's Answer, BellSouth states that ACS Traffic is routed over the Common Transport Trunk Group. Please state each and every fact that supports BellSouth's assertion that ACS Traffic is routed over the Common Transport Trunk Group.

RESPONSE: BellSouth keeps records of changes to routing on its trunk groups in BellSouth's Advanced Routing and Trunking System (ARTS). There are no records in ARTS that shows changes to routing on any of the trunk groups to Brandenburg since the earliest records in that system, January 1999, indicating that no routing changes have been made since at least that time. Since the establishment of the trunk groups to Brandenburg, there has only been EAS traffic on the EAS groups, AF128757 and AF146667. All other traffic from BellSouth, including ACS Traffic, has been routed over the CTTG, AF111053.

BellSouth performed a detailed study of the traffic on Brandenburg's trunk groups for three full days of calls, February 1 through February 3, 2005, and found EAS traffic on the EAS trunk groups and no ACS traffic on those trunk groups. Detailed analysis of the individual call level data showed 99.93% of the traffic on the EAS trunk groups to be local traffic originated on BellSouth's network. The remaining 0.07% was traffic that originated outside BellSouth's network, i.e., with other providers, Interstate or InterLATA calls originating with ported numbers on BellSouth's network, or Interstate or InterLATA calls originating outside BellSouth's network.

None of the traffic over these EAS trunk groups was ACS Traffic. The complete study consists of 288 pages. The first and last pages of the study are provided in the attachment. The customers' charge, dialing and dialed telephone numbers have been deleted due to privacy and confidentiality concerns and the minutes of use deleted due to confidentiality and proprietary concerns.

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 5

**ATTACHMENT TO DATA REQUEST,
ITEM NO 5**

REDACTED

REQUEST: Please provide any and all documentation in the possession of BellSouth or its agents demonstrating or refuting that BellSouth does not currently deliver, and/or has never delivered, ACS Traffic for termination to Brandenburg over any other trunk group than the Common Transport Trunk Group.

RESPONSE: A spreadsheet reflecting traffic volumes indicated by Brandenburg's CABS billing and BellSouth's settlements system for a sample period during the relevant period is attached hereto. BellSouth notes that this information is confidential and proprietary. Accordingly, BellSouth is filing a Confidentiality Petition, pursuant to KRS 61.878 and pertinent regulations, simultaneously with these responses so that the Kentucky Public Service Commission may enter an appropriate order to protect the confidential information. The variances between the traffic volumes indicated for each month are very small. This indicates that the traffic being delivered to Brandenburg over the CTTG was also being billed to BellSouth on Brandenburg's CABS bills. If the ACS Traffic had been delivered over another route, the difference would have been obvious in this data, because the ACS Traffic at the time amounted to 17.5% of the total traffic on the CTTG.

Also see the attachment provided in AT&T Kentucky's Response to Item No. 5. This attachment contains information that is confidential and proprietary.

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 6

**ATTACHMENT TO DATA REQUEST,
ITEM NO 6**

ENTIRE DOCUMENT IS REDACTED

**1page contains a document titled
“BellSouth Double Payment of ACS Minutes of Use to
Brandenburg Telephone Company”**

REQUEST: From April 2004 to the present, has BellSouth terminated ACS Traffic to Brandenburg over the Common Transport Trunk Group? If not, specify how BellSouth has terminated ACS Traffic to Brandenburg.

RESPONSE: Yes, BellSouth has terminated ACS Traffic to Brandenburg through the Common Transport Trunk Group from April 2004 to the present.

REQUEST: Please identify each and every month when BellSouth routed ACS Traffic to Brandenburg through any facilities other than the Common Transport Trunk Group. For each, identify with specificity how BellSouth routed the ACS Traffic to Brandenburg.

RESPONSE: See AT&T Kentucky's Response to Item No. 7. BellSouth has not routed ACS Traffic to Brandenburg through any facilities other than the Common Transport Trunk Group.

REQUEST: State each and every fact that supports BellSouth's claim that it overpaid Brandenburg for terminating ACS Traffic.

RESPONSE: Pursuant to the Agreement for the Provision of Telecommunications Services and Facilities between Brandenburg and BellSouth, effective January 1, 1985, BellSouth compensated Brandenburg for terminating ACS Traffic through a settlements process described in said Agreement, whereby rather than Brandenburg billing BellSouth for services provided, BellSouth netted amounts due to and from Brandenburg and remitted payment to Brandenburg. According to Brandenburg in its Answer to the Complaint, in or around January 1995, Brandenburg initiated and implemented Carrier Access Billing Service (CABS), whereby rather than relying entirely on the Settlements Process for payments from BellSouth, Brandenburg began submitting bills to BellSouth for services rendered. The Brandenburg CABS bills contained billing for terminating all traffic delivered to it over the Common Transport Trunk Group (CTTG), which includes ACS Traffic. Brandenburg billed BellSouth through CABS and BellSouth paid Brandenburg's CABS bills for the ACS Traffic included in that billing while also continuing to pay for the same traffic through the Settlements Process.

In April 2004, when BellSouth discovered that it had been paying Brandenburg through both CABS and the Settlements Process for the identical terminating ACS Traffic, BellSouth notified Brandenburg, and beginning May 2004, BellSouth ceased paying Brandenburg for the ACS Traffic through the Settlements Process. Brandenburg has never disputed BellSouth's discontinuance of payments for this traffic through the Settlements Process.

RESPONSE (CONT.):

To confirm that no ACS Traffic was being routed over the EAS trunk groups, two steps were taken. First, as stated in the previous Response to Item No. 5, a review of the routing translations changes in the ARTS system confirmed that no CTTG or EAS trunk group routing changes had been made since January 1999. Secondly, a study of sampled traffic from February 1 through February 3, 2005, confirmed that ACS Traffic was being routed over the CTTG trunk group.

REQUEST: Provide any and all documentation, including call detail records, in the possession of BellSouth or its agents that either supports or refutes BellSouth's claim that BellSouth overpaid for terminating ACS Traffic.

RESPONSE: See all attachments related to ACS Traffic and payment for such traffic that have been produced pursuant to these data requests, specifically Attachment A to BellSouth's Response to Item No. 3 for copies of the SN-642-Net Settlements Statements for ACS payments made through the settlements system. This information is confidential and proprietary. Accordingly, BellSouth is filing a Confidentiality Petition, pursuant to KRS 61.878 and pertinent regulations, simultaneously with these responses so that the Kentucky Public Service Commission may enter an appropriate order to protect the confidential information. BellSouth's standard procedure is to keep full AMA switch recordings for 60 days, and to keep ICO EMI records for six months due to the large volumes of data involved. Therefore, such records are not available for the time intervals under discussion.

REQUEST: State each and every fact that supports BellSouth's claim that Brandenburg violated Section 2.07 of the statewide CMRS Agreement as alleged in Paragraph 13 of BellSouth's Complaint.

RESPONSE: The Kentucky Settlement Agreement effective May 1, 2004, regarding Third Party Transit Traffic states unequivocally in paragraph 2.07 that "...Subject to the audit provisions set forth below in this subsection, the Signatory CMRS Providers and the Rural LECs agree to accept BellSouth's measurement of minutes of use and industry standard call detail records as the basis for the billing from and compensation to the Rural LECs for Covered CMRS Provider Traffic as set forth in this Section. Notwithstanding the foregoing, any party may request an audit of such measurements within twelve months of the applicable billing date..." Notwithstanding the fact that Brandenburg has failed or refused to "request an audit of such measurements," for each month during the disputed period, with the exception of the July 2004 bill for June 2004 usage, Brandenburg credited BellSouth with significantly less CMRS Minutes Of Use (MOU) than shown on the industry-standard EMI records BellSouth provided.

REQUEST: State each and every fact that supports BellSouth's claim that BellSouth overpaid Brandenburg for Covered CMRS Provider Traffic.

RESPONSE: For each month during the disputed period, except for the July 2004 bill for June 2004 usage, Brandenburg credited BellSouth with significantly less CMRS Minutes Of Use (MOU) than shown on the industry-standard EMI records BellSouth provided. Prior to the July 2005 bill (for June 2005 usage), when BellSouth began withholding the disputed differences, BellSouth was paying full terminating access charges for the disputed minutes, where it should have been paying only the amounts specified in the Agreement, \$0.025 per CMRS MOU in 2005 and \$0.015 per CMRS MOU in 2006. A summary of the overpayment is included in AT&T Kentucky's Attachment C to Item 13.

REQUEST: Provide any and all documentation, including call detail records, in the possession of BellSouth or its agents that either supports or refutes BellSouth's claim that BellSouth overpaid for Covered CMRS Provider Traffic.

RESPONSE: Although BellSouth does not routinely keep EMI records for longer than six months due to the large volume of data involved, because of this dispute with Brandenburg BellSouth has kept its EMI records for Brandenburg from November 2004 through the present. Brandenburg already has access to these records through a website mailbox. A username and password can be created to make this data available to the Kentucky Public Service Commission for download through the same mailbox that Brandenburg uses to routinely retrieve its EMI records. This effort will have to be closely coordinated due to the size of the mailbox itself. Brandenburg has had access through this mailbox to BellSouth's EMI records since at least the effective date of the CMRS agreement in May 1 2004, and has had the capacity to download and maintain such records if it so desired since at least that time.

BellSouth requested that Brandenburg provide example data for the processing which produced its reductions to and/or exclusions from the EMI records provided. BellSouth examined the sample data provided, and found that all of the exclusions were made through erroneous assumptions and misinterpretations of the EMI data. Those errors are described in detail in Attachment A to this request. The data itself is contained in Attachment B. The calling telephone number and minutes of use (MOU) contained in this document are proprietary and are not provided due to confidentiality and proprietary concerns.

Attachment B is an extract from a very large (3.2 Mb) spreadsheet detailing Brandenburg's processing of BellSouth's EMI records for the sample period. The full spreadsheet can be made available upon request.

Attachment C provides a summary listing of CMRS credits given and relevant BellSouth EMI record amounts for the disputed interval. BellSouth notes that this information contained in Attachments B and C

RESPONSE (CONT.):

is confidential and proprietary. Accordingly, BellSouth is filing a Confidentiality Petition, pursuant to KRS 61.878 and pertinent regulations, simultaneously with these responses so that the Kentucky Public Service Commission may enter an appropriate order to protect the confidential information.

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 13
ATTACHMENT B

**ATTACHMENT B TO DATA REQUEST,
ITEM NO 13**

REDACTED

BellSouth's Analysis of Brandenburg's AMA and EMI record match for 8/15/05 thru 8/17/05 Usage

ROW LEGEND

6. Examples of Wireless roaming traffic for which BTC matched the call with the EMI record, but did not match the OCN codes. BTC identifies OCN of roaming number, BST identifies OCN of Wireless Carrier that delivered the call.

5. Examples of Wireless roaming where BTC's OCN for the roaming number is T-Mobile OCN for another state, but the EA OCN is for T-Mobile for the state of Kentucky.

4. TPM OCN lookup reflects BTC's OCN, but Type 1 roaming call was delivered to BST by Wireless carrier as reflected on the EMI record.

3. Examples of wireless Pooled numbers not properly identified by BTC's TPM lookup. TPM lookups must be at 1000 block (e.g. 480-547) to capture pooled numbers.

2. Examples where BTC's originating numbers were ported.

Row Legend	From NPA	From NXX	From Line #	OCN as found by BTC's TPM Lookup	From OCN Carrier Name	MOU	Has "From" Number Been Ported?	LEN NPA	LEN NXX	LEN OCN	LEN OCN NAME	OCN of LRN of POCN from Number	Carrier of "ported" from Number	Ctr. Type	EMI Record OCN of POCN of call	EMI Record OCN Carrier Name	OCN of "Pooled" From Number per TPM	Pooled Number OCN Carrier Name	Pooled Number OCN Carrier Type
4	270	688	547	0388 BRANDENBURG	0388 BRANDENBURG	N	N								355C	T-Mobile USA			4. Wireless roaming calls from BTC Type 1. Wireless subscribers delivered by MFB Wireless carrier.
	270	547	547	0388 BRANDENBURG	0388 BRANDENBURG	N	N								355C	T-Mobile USA			
	270	547	547	0388 BRANDENBURG	0388 BRANDENBURG	N	N								355C	T-Mobile USA			
3	819	438		POINTE COMMUNICATIO	295193 CORP.-CA	N	N								355C	T-Mobile USA	6529	T-MOBILE USA, INC.	3. Wireless Pooled numbers not properly identified by BTC's TPM lookup.
	513	503		CHINGNANTI BELL	2774 WIRELESS, LLC	N	N								355C	T-Mobile USA			
3	480	452		2921 PAC - WEST	2921 PAC - WEST	N	N								355C	T-Mobile USA	6529	T-MOBILE USA	5. Wireless roaming traffic for which BTC matched the call with the EMI record, but did not match the OCN codes.
	480	452		2921 PAC - WEST	2921 PAC - WEST	N	N								355C	T-Mobile USA	6529	T-MOBILE USA	
	480	452		2921 PAC - WEST	2921 PAC - WEST	N	N								355C	T-Mobile USA	6529	T-MOBILE USA	
	480	452		2921 PAC - WEST	2921 PAC - WEST	N	N								355C	T-Mobile USA	6529	T-MOBILE USA	
6	260	604		2964 OMINPOINT	2964 OMINPOINT	N	N								355C	T-Mobile USA			6. Wireless roaming traffic for which BTC matched the call with the EMI record, but did not match the OCN codes.
	260	604		2964 OMINPOINT	2964 OMINPOINT	N	N								355C	T-Mobile USA			
	317	652		2964 OMINPOINT	2964 OMINPOINT	N	N								355C	T-Mobile USA			
	317	652		2964 OMINPOINT	2964 OMINPOINT	N	N								355C	T-Mobile USA			
	317	652		2964 OMINPOINT	2964 OMINPOINT	N	N								355C	T-Mobile USA			
	317	652		2964 OMINPOINT	2964 OMINPOINT	N	N								355C	T-Mobile USA			

NOTE that this is an excerpt from a much larger spreadsheet, measuring 3 Megabytes, 13373 lines of data. BellSouth's analysis addressed every call record in the 3-day traffic sample provided by BTC. See list of types of errors found, lines 3 through 7. Complete spreadsheet can be transmitted if necessary or useful.

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 13
ATTACHMENT C

**ATTACHMENT C TO DATA REQUEST,
ITEM NO 13**

ENTIRE DOCUMENT IS REDACTED

**1 page document titled
"Brandenburg (OCN 398)
MPB CMRS CLAIM
CMRS Agreement dated 5-1-04"**

AT&T Kentucky
Kentucky Public Service Commission
Case No. 2006-00546
Brandenburg's 1st Data Request
February 8, 2007
Item No. 13
ATTACHMENT A

**ATTACHMENT A TO DATA REQUEST,
ITEM NO 13**

Analysis Of Brandenburg Telephone Company's Process for CMRS Credits

Brandenburg Telephone Company (BTC) is contractually obligated to use BellSouth Telecommunication's (BST) EMI 110101 records to determine which CMRS calls should be credited to BST pursuant to the CMRS agreement. Unfortunately, BTC uses its own process in lieu of BST's EMI records. The following explains BST's understanding of how BTC determines which CMRS calls to credit and then goes on to explain the EMI 110101 records and the results of BST's review of the BTC process and how that process understates the CMRS traffic that qualifies for a credit.

As BST understands it, the process used by BTC to process CMRS credits is as follows:

1. For each call terminating to BTC from the BST Common Transport Trunk Group (CTTG), BTC compares the originating telephone number reflected in BTC's terminating switch AMA records with the Terminating Point Master (TPM) file to determine the Operating Company Number (OCN) associated with that originating telephone number.
2. BTC then compares the OCNs with the EMI 110101 call detail records provided by BST.
3. BTC matches the BTC AMA records and the BST EMI records based on date, start time, duration and called numbers, and BTC provides the Wireless credits to BST in accordance with the settlement agreement only where the OCN determined by BTC matches the originating carrier reflected in the EMI record.
4. For matched calls that do not reflect the same OCN code, BTC does not provide a credit to BST, and bills BST full terminating access charges.

The BTC process above does not consider number porting, roaming and CMRS OCN variations. The following provides a brief description about OCN in these EMI records and is followed by the results of BST's analysis of the example data provided by BTC.

The BST-provided EMI 110101 call detail records provide the OCN of the carrier that delivered the transit call to BST. The originating carrier is identified by the trunk group over which the transit traffic was delivered to BST. The OCN used to identify the wireless carrier is the OCN assigned by that wireless carrier for the state in which the wireless carrier delivered the traffic to BST. Many wireless carriers have multiple OCNs they use in different states. As illustrated below, the manner in which BST identifies the

OCN provided in the EMI records is critically different from the procedure BTC uses to identify the OCN of the calling (from) number in the BTC AMA records.

On September 15, 2005, BST received data from BTC for the time period of August 15, 2005, through August 17, 2005, reflecting those calls that matched based on date, start time, duration and called numbers, but that did not reflect matching OCNs.

Assuming the BTC process accurately matched its AMA calls with the BST EMI records, the following are BST's findings. The paragraph numbers below correspond to the numbered items denoted in the "Row Legend" of Attachment B to Request Item No. 13. Attachment B provides examples of many of the following situations.

- (1) In the data provided, some records were included for calls to which BellSouth has applied an Operating Company Number (OCN) of 0000. This indicates that the call is not from a CMRS provider, and that BTC should reference the CIC code field of the EMI record to determine which carrier delivered the call to BST. BST does not expect CMRS credit for those records. The percentages in this analysis are calculated after excluding those records, as those records are not relevant to this discussion.
- (2) BST compared the 10-digit originating telephone numbers (provided by BTC from its AMA recordings) to the Local Number Portability (LNP) database and found that 49% of the total MOUs originated from numbers that have been ported. The BTC process does not take into consideration number portability and therefore cannot accurately identify the responsible carrier.
- (3) BST determined that BTC uses the Terminating Point Master (TPM) file only at the NPA-NXX level to identify OCNs. Due to Number Pooling, TPM file lookups must be completed to the 1000's digit (NPA-NXX-Xnnn) to correctly identify the OCN. BellSouth examined every record for which (a) the originating number was not ported and (b) the originating carrier type as identified by BTC was CLEC. We found all of the originating numbers for those calls, representing slightly more than 3% of the MOUs, to be in blocks for which the actual OCN is that of a CMRS carrier. This indicates that BTC's process does not take into consideration Number Pooling, and therefore does not accurately identify the responsible carrier.
- (4) Review of the BTC data also revealed calls from wireless carriers where BTC's TPM OCN did not match the corresponding EMI OCN. These calls, amounting to 23% of the MOUs, are roaming wireless calls that use the CMRS providers

identified by the BST EMI records to deliver the calls to BTC. In the case of roaming wireless calls, the CMRS provider who delivers the call to BST - not the originating CMRS provider - is responsible for the terminating charges. The BTC process does not take into consideration the roaming traffic between different carriers and therefore cannot accurately identify the responsible carrier.

- (5) BST also found where the BTC process did not take into account the various OCNs used by wireless carriers throughout the nation. For example, there are matched calls where the OCN determined by BTC is a T-Mobile OCN for California (6529) because the originating wireless roaming number was a California number. Since the call was delivered to BST by T-Mobile in Kentucky, the corresponding EMI OCN code was a T-Mobile OCN for Kentucky (365C). Based on this information, BTC did not consider this traffic to be covered by the settlement agreement. The BTC process does not take into consideration the roaming traffic of a single carrier with multiple OCNs and therefore cannot accurately identify the responsible carrier.
- (6) BST found numerous calls from Brandenburg telephone numbers (i.e., calls to which BTC assigned the BTC OCN of 0398) that BTC matched to BST records that reflected OCNs for wireless carriers. BST strongly suspects that these are Type 1 wireless calls using Brandenburg telephone numbers, being delivered via the wireless carriers reflected on the records. These represent another 23% of the MOUs. The BTC process does not identify Brandenburg Type 1 wireless traffic and therefore does not accurately identify the OCN code of the originating wireless carrier.

REQUEST: Provide the specific EMI records for any and all Covered CMRS Provider Traffic for which BellSouth alleges it did not receive proper crediting of minutes by Brandenburg.

RESPONSE: BellSouth does not routinely keep EMI records for longer than six months, due to the large volume of data involved, so does not have the EMI records for the entire period at issue. Brandenburg has access to the EMI records for November 2004 through July 2005 through a website mailbox as indicated in BellSouth's Response to Item No. 13.