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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte Presentation*
In the Matter of Developing a Unified Intercarrier Compensation Regime
CC Docket No. 01-92

Dear Ms. Dortch:

Iowa Network Services, Inc. (INS), Onvoy, Inc. (Onvoy) and South Dakota Network, LLC (SDN), by their attorneys, submit this ex parte presentation in response to the letters dated September 9, 2005 and January 3, 2006, filed by CTIA concerning phantom traffic.

INS, Onvoy and SDN are centralized equal access (CEA) providers in the states of Iowa, Minnesota and South Dakota, respectively (the carriers collectively will hereinafter be referred to as the CEA providers). As CEA providers their switches serve as intermediate tandem switches for some traffic and sole tandem switches for other traffic. The CEA tandem providers interconnect with 241 telephone companies, 54 CLECs, and 17 wireless companies. The CEA provider networks allow Interexchange carriers (IXCs) and other carriers to avoid the need to interconnect with each rural LEC.

The CEA providers believe that phantom traffic primarily is caused when calls over dedicated trunks terminating into a switch are not properly recorded before the traffic is mixed with other traffic on a common trunk group. If appropriate recording for billing purposes is not passed on or does not occur at this crucial point, the ability to bill the appropriate carrier is lost. Accordingly, the CEA providers support the development of a requirement that tandem providers be required to provide adequate billing records to allow for identification of traffic received from each dedicated trunk group as it is merged onto a common trunk group. The CEA providers also support a requirement that carriers transmit complete and accurate information identifying the

origin of a call, including the Jurisdictional Information Parameter (JIP) in accordance with the guidelines published in the ATIS NIIF document, ATIC-030011, to facilitate the creation of accurate billing records. The CEA providers note that the Midsize Carrier Coalition recommended a similar position in its ex parte presentation dated December 1, 2005.

With respect to CTIA's specific allegations, the CEA providers comment as follows:

1. CTIA states that multiple tandems contribute to phantom traffic issues because call records from one tandem are not transferred to other tandems.

Response: Wherever a tandem fails to record the appropriate call detail information in order to produce appropriate billing records, access cannot be accurately assigned or billed. This is true if there is one tandem or multiple tandems. Each tandem represents a potential source of failure in the billing process. The CEA providers create accurate and detailed billing records and pass them to the next tandem or to the terminating carrier. The CEA providers support a requirement that all tandem providers create accurate and detailed billing records and pass such records to the next tandem provider or terminating carrier.

2. CTIA states that a cause of phantom traffic is rural LECs' lack of SS7 connections.

Response: Of the LECs served by the CEA providers, fewer than 500 lines out of 785,000 lines are not SS7 compatible between the LEC switch and the CEA switch and in these cases SS7 capability is added at the CEA switch. In any event, SS7 capability is not necessary for a tandem provider to create and provide accurate billing records. In Iowa, Minnesota, and South Dakota, accurate billing records are created at the terminating point of a dedicated facility based on the physical location of the traffic, not on SS7 data.

3. CTIA states that separate connections between the tandem switch and the LEC will diminish phantom traffic, but recognizes that there would be greater interconnection costs.

Response: Where traffic terminates from the CEA providers onto common trunks to the rural LECs, the records are accurate and sufficient for appropriate billing. To require additional trunks would create an unnecessary expense. Where LECs receive terminating traffic from another source, such as an RBOC tandem switch, phantom traffic may exist if the tandem provider does not create appropriate billing records that identify the type of traffic terminating to the LEC. In Minnesota PUC Docket No. P-421/C-04-200, a complaint filed by the Minnesota Telecommunications Alliance against Qwest resulted in an agreement whereby Qwest agreed to provide accurate records that would identify the types of traffic terminated to the LEC, including Wireless Transit Records.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

/s/ Mary J. Sisak
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Mary J. Sisak

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