EXHIBIT

A

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 12-0550

Direct Testimony of Carl C. Albright, Jr.
On Behalf of AT&T Illinois

AT&T Illinois Exhibit 2.0

PUBLIC

December 5, 2012

ISSUES
1(a), 11, 16, 17, 18, 49

77 AT&T Illinois maintains that Sprint's proposed IP-to-IP language should not be included
78 in the ICA.
79

80 **Q. WHAT DO YOU MEAN WHEN YOU REFER TO "IP-CAPABLE**
81 **EQUIPMENT"?**

82 A. All the voice traffic that AT&T Illinois currently exchanges with Sprint (and with all
83 other carriers with which it exchanges traffic) is exchanged in Time Division Multiplex
84 format, commonly called "TDM." On the Internet, in contrast, information (including
85 voice) is in Internet Protocol ("IP") format. When I say "IP-capable equipment," I am
86 referring to equipment that can send, receive or process information in IP format, rather
87 than in TDM. As I indicated, today, all traffic that Sprint delivers to AT&T Illinois is
88 delivered in TDM, because AT&T Illinois' network is a TDM network. When I say that
89 Sprint wants the option of establishing IP-to-IP interconnection, I mean it wants to
90 deliver traffic in IP format to AT&T Illinois via a direct interconnection between IP-
91 capable equipment on Sprint's network and IP-capable equipment on AT&T Illinois'
92 network.
93

94 **Q. WHAT IS THE BASIS FOR AT&T ILLINOIS' POSITION THAT THE ICA**
95 **SHOULD NOT ALLOW SPRINT TO ESTABLISH IP-TO-IP**
96 **INTERCONNECTION WITH AT&T ILLINOIS?**

97 A. There are two separate reasons for AT&T Illinois' position. One reason is that section
98 251(c)(2) of the Telecommunications Act of 1996 ("1996 Act"), which requires AT&T
99 Illinois to provide interconnection with its network for Sprint's equipment, does not
100 encompass or require IP-to-IP interconnection. As a result, AT&T Illinois has no duty (at

101 least no duty that can be enforced in this arbitration under section 252 of the 1996 Act) to
102 provide IP-to-IP interconnection for Sprint.
103
104 The second reason for AT&T Illinois' opposition to Sprint's language is that AT&T
105 Illinois does not have an IP network, *i.e.*, does not have IP-capable equipment with which
106 Sprint could interconnect even if section 251(c)(2) did require incumbent carriers with IP
107 networks to provide interconnection with those networks.
108
109 **Q. WILL YOU BE SUPPORTING BOTH OF THOSE REASONS IN THIS**
110 **TESTIMONY?**
111 A. No. The first reason (*i.e.*, that section 251(c)(2) does not require IP-to-IP
112 interconnection) is purely legal, and I do not elaborate on AT&T Illinois' legal position
113 in this testimony.[1] I do note below, however, that the Federal Communications
114 Commission ("FCC") is considering the legal question and that this Commission should
115 not get out ahead of the FCC and does not need to get out ahead of the FCC in order to
116 resolve the issues it needs to resolve in this proceeding. In the testimony that follows, I
117 do show that AT&T Illinois has no IP-capable network for Sprint to interconnect with.
118

[1] There is no secret about the legal basis for AT&T Illinois' position; it is simply a matter that AT&T Illinois believes is appropriately addressed in legal briefs rather than in testimony. For the benefit of Sprint, Staff and the Administrative Law Judges, however, I am informed by counsel that the basis for AT&T Illinois' position, in abbreviated form, is that under section 251(c)(2), AT&T Illinois is required only to provide interconnection to telecommunications carriers for the transmission and routing of telephone exchange service and exchange access, while the services for which Sprint seeks (hypothetically and in the future) IP-to-IP interconnection are "information services," because they (1) would require a net protocol conversation to allow intercommunication with end users served by the PSTN, and (2) would integrate voice calling with a variety of other functionalities that allow end users to "generat[e], acquir[e], store[e], transform[], process[], retrieve[], utilize[e], or mak[e] available information via telecommunications" (47 U.S.C. § 153(2)).

185 A. Yes, but those wholesale customers convert the traffic to TDM format before they deliver
186 the traffic to AT&T Illinois. That is exactly what AT&T Illinois is proposing here:
187 AT&T Illinois is not disputing Sprint's right to carry traffic in IP format. Before Sprint
188 delivers that traffic to AT&T Illinois, however, it must convert it to TDM, just as AT&T
189 Illinois' other wholesale customers that carry IP traffic do, and just as Sprint does today.
190

191 **Q. WHAT ABOUT AT&T ILLINOIS' RETAIL CUSTOMERS? DOESN'T AT&T**
192 **ILLINOIS HAVE RETAIL U-VERSE CUSTOMERS WHO ORIGINATE OR**
193 **TERMINATE VOIP (VOICE OVER INTERNET PROTOCOL) CALLS IN IP**
194 **FORMAT?**

195 A. Yes, AT&T Illinois does have such customers.
196

197 **Q. DOESN'T THAT MEAN THAT AT&T ILLINOIS HAS AN IP-CAPABLE**
198 **NETWORK?**

199 A. No, because the VoIP calls that those customers make and receive are not carried on an
200 AT&T Illinois IP network. Rather, they are carried over the IP network owned by AT&T
201 Illinois' affiliate, AT&T Corp., which performs the IP-to-TDM conversion.
202

203 **Q. PLEASE DESCRIBE THE EQUPMENT AND FACILITIES THAT ARE USED**
204 **FOR PROVIDING U-VERSE IP SERVICE.**

205 A. A diagram illustrating at a high level the equipment and facilities used for providing
206 U-verse VoIP service is attached as Schedule CCA-1. The Residential Gateway (labeled
207 "2Wire RG") and the piece of equipment labeled "FTTN," which is the Internet Protocol
208 Digital Subscriber Line Access Multiplexer ("IP DSLAM") are owned by AT&T Illinois
209 and are part of AT&T Illinois' outside plant "local loop" network. The equipment in the

210 Central Offices, Intermediate Offices and the Video Hub Office ("VHO") is used to
211 aggregate the IP data stream and the video stream into a single data stream for delivery
212 to/from the AT&T U-verse end user. The IP data stream, including VoIP traffic, is
213 carried over special access facilities from the AT&T Illinois VHO to the AT&T Corp.
214 network. AT&T Illinois provides the transport and aggregation for the IP data stream;
215 AT&T Corp. provides the necessary conversion and management of the data within the
216 IP data stream, including any necessary conversion of the VoIP data stream to TDM
217 format if that VoIP call is to be exchanged with the PSTN. The VoIP network, consisting
218 of routers and gateways, is part of AT&T Corp.'s network.
219

220 **Q. COULD SPRINT ESTABLISH IP INTERCONNECTION AT THE**
221 **RESIDENTIAL GATEWAY OR THE IP DSLAM?**

222 A. No.
223

224 **Q. WHY NOT?**

225 A. The Residential Gateway is located within a customer premise and is similar to a modem,
226 performing the functions necessary to provide the customer with U-verse video service,
227 internet service and VoIP depending on the services the customer has purchased. Each
228 U-verse customer has an RG, and the RG takes the incoming data stream for that
229 customer and breaks it out to the individual data services listed above to provide cable
230 TV service via set top boxes connected to each of the customer's televisions, high speed
231 internet to the customer's computer equipment and VoIP to the customer's phones. The
232 RG also combines the customer's various outgoing data signals such as video pay-per-