

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON INDEPENDENT
TELECOMMUNICATIONS ASSOCIATION,
WASHINGTON EXCHANGE CARRIER
ASSOCIATION, THE TOLEDO
TELEPHONE CO., INC., TENINO
TELEPHONE COMPANY, KALAMA
TELEPHONE COMPANY AND HOOD
CANAL TELEPHONE COMPANY, d/b/a
HOOD CANAL COMMUNICATIONS,

Complainants,

v.

MCLEODUSA TELECOMMUNICATIONS
SERVICES, L.L.C. AND PAETEC
COMMUNICATIONS, INC.,

Respondents.

DOCKET UT-111816

DIRECT TESTIMONY OF

JOHN OBLIZALO

ON BEHALF OF

COMPLAINANTS

April 6, 2012

1 **Q. PLEASE STATE YOUR NAME AND GIVE US YOUR BUSINESS**
2 **ADDRESS FOR THE RECORD.**

3 A. My name is John Oblizalo. My address is 300 E. Dalby Road, Union,
4 Washington 98592.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Hood Canal Telephone Company, d/b/a Hood Canal
7 Communications. My position is Central Office Supervisor.

8 **Q. PLEASE PROVIDE YOUR BACKGROUND IN**
9 **TELECOMMUNICATIONS.**

10 A. I began my career in telecommunications in 1989 by becoming employed by a
11 predecessor to Qwest Communications, which has since been acquired by
12 CenturyTel. I then joined Hood Canal and I have been employed by Hood Canal
13 since then. I have served in all aspects of telecom, with a primary focus on access
14 and switching matters.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A. I am testifying from Hood Canal's perspective about the traffic that was
17 terminating to Hood Canal through McLeodUSA Telecommunications Services,
18 L.L.C. For ease of reference I will refer to McLeod as simply McLeod.

19 **Q. PLEASE SUMMARIZE YOUR TESTIMONY IN THIS PROCEEDING?**

20 A. From Hood Canal's perspective, McLeod routed traffic to Hood Canal in a way
21 that made access traffic appear to be local in nature.

1 **Q. PLEASE EXPLAIN WHAT YOU FOUND.**

2 A. As a result of looking at declining access minutes and becoming aware of access
3 avoidance schemes across various parts of the country, we decided to do an
4 investigation. An initial test call was placed on an intraLATA basis to our office
5 from a trusted source using a landline to originate the call. Knowing when the
6 call was placed allowed us to capture the call. The originating calling number
7 was 360-864-4452, which is a number associated with the Toledo exchange at
8 Toledo Telephone Company. However, when the calling record arrived to our
9 switch, it had been modified to make it look to the switch as though the call
10 originated from 360-918-0038, a number associated with numbering resources
11 possessed by McLeod. Since 360-918-0038 is associated with an exchange in
12 Hood Canal's EAS calling area, and Toledo is not in the Hood Canal EAS calling
13 area, it appeared that the record was modified to avoid access charges. I tried to
14 call the 360-918-0038 number and it turned out the number is not a valid number
15 and cannot be called. I have attached an exhibit which sets out the calling record.
16 Exhibit No. ____ (JO-2C). This exhibit is designated as confidential because it
17 contains CPNI.

18 **Q. WHAT DID YOU DO NEXT?**

19 A. The result of this call example prompted me to further investigate the originating
20 calling number 360-918-0038 as it appeared in our records. I found that over
21 1,300 calls had been placed to our Hood Canal central office over a two day
22 period as shown in the records attached as Exhibit No. ____ (JO-3C). Like
23 Exhibit No. ____ (JO-2C), this exhibit contains CPNI. All had the same fictitious

1 calling number and were all apparently modified by the carrier for access
2 avoidance purposes.

3
4 I later found out that the way the records were modified is that the 360-918-0038
5 number was entered into the "charge to" field. When a number is entered in the
6 charge to field, we no longer receive the calling party number in the record field
7 and it looks to us as though the charge to number is, in fact, the calling party
8 number.

9 **Q. HAVE YOU HAD AN OPPORTUNITY TO REVIEW THE DATA**
10 **SUPPLIED BY MCLEOD IN RESPONSE TO DATA REQUESTS 1-5 AND**
11 **1-6?**

12 A. Yes. A summary of that data as it affects Hood Canal is attached as Confidential
13 Exhibit No. _____ (JO-4C).

14 **Q. HAS THE FINANCIAL EFFECT OF THE TRAFFIC BEEN**
15 **CALCULATED?**

16 A. Yes. That information is being presented by Mr. Craig Phillips.

17 **Q. DID THE CALLS THAT WERE DELIVERED TO HOOD CANAL**
18 **THROUGH MCLEOD DIFFER IN ANY WAY FROM OTHER ACCESS**
19 **CALLS IN THE WAY THOSE CALLS WERE TREATED BY YOUR**
20 **SWITCH?**

21 A. No. The switch has to perform the same functions for each of the calls delivered
22 from McLeod to Hood Canal as calls delivered by any other interexchange
23 carrier. The costs for the operation of the switch are the same for those calls

1 delivered from McLeod as calls delivered by interexchange carriers to whom we
2 assess access charges.

3 **Q. DID THE CALLS YOU ARE DESCRIBING AS DELIVERED FROM**
4 **MCLEOD ORIGINATE OUTSIDE OF THE HOOD CANAL EAS AREA?**

5 A. Yes.

6 **Q. WHAT IS THE SIGNIFICANCE OF THAT FACT?**

7 A. That means they are access calls and the carrier should pay terminating access
8 charges.

9 **Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?**

10 A. Yes.