

**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

RICK VITZTHUM

ON BEHALF OF

COMPLAINANTS

April 6, 2012

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

3 A. My name is Rick Vitzthum. My address is 225 Central Avenue West, Tenino,
4 Washington 98589.

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

6 A. I am employed by Scatter Creek Limited, the holding company for Tenino
7 Telephone Company and Kalama Telephone Company. I serve as Controller for
8 both companies. One of my responsibilities as Controller is to oversee the Carrier
9 Access Bills or CABs billing system.

10 **Q. PLEASE DESCRIBE YOUR HISTORY IN THE**
11 **TELECOMMUNICATIONS INDUSTRY.**

12 A. I started my career in the Telecommunications Industry in May, 1990 when I was
13 employed as Controller for Kalama Telephone Company. Several years later
14 Kalama Telephone Company was acquired by Scatter Creek Limited. Prior to my
15 employment with Kalama Telephone Company I was in Public Accounting and
16 was involved in the auditing of Independent Local Exchange Carriers.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
18 **PROCEEDING?**

19 A. I will testify about the access avoidance experience by both Tenino and Kalama
20 for traffic delivered through McLeodUSA Telecommunications Services, L.L.C.

21 **Q. PLEASE DESCRIBE WHAT YOU HAVE DONE TO INVESTIGATE THE**
22 **TRAFFIC TERMINATING TO TENINO AND KALAMA.**

1 A. Several years ago I purchased a magicjack so we could perform some test calls to
2 see how it worked and used the network. I made test calls between our Tenino
3 and Kalama offices. I took the magicjack with me to Washington DC and made
4 several calls from there back to my Tenino office. Even though my magicjack
5 assigned number was a Tacoma number and all calls made were long distance, I
6 did not receive any of the normal call detail records (CDRs) for terminating long
7 distance traffic from Qwest, now CenturyLink. I then used our Nortel, now
8 Genband, switch's Trunk Group Measurement Utility (TGMU) to find the
9 terminating call records. TGMU uses the SS7 signaling data to create a TGMU
10 call record. From the TGMU call records, I found these calls were terminated on
11 our common toll trunks with the Qwest/CenturyLink Tandem. The TGMU
12 records showed that the calling number had been changed to a specific number.
13 For Kalama in the Portland LATA, the number was changed to 360-232-0041.
14 The NPA-NXX of 360-232 is a Longview EAS exchange. For Tenino in the
15 Seattle LATA, the number was changed to 360-918-0038. The NPA-NXX of
16 360-918 is an Olympia EAS exchange. I double checked to see if we had any
17 Qwest terminating CDRs for either 360-232-0041 or 360-918-0038 and we did
18 not receive any terminating CDRs for any calls to either number. The Qwest
19 CDRs are used to bill terminating access.

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

21 A. Once I had identified the replaced calling number to be 360-232-0041 or 360-
22 918-0038, I went to the Telecordia Terminating Point Master (TPM) and found
23 that the NPA-NXX of 360-232 and 360-918 belonged to Operating Company

1 Number, OCN, 2981. According to the TPM, the OCN of 2981 is assigned to
2 "MCLEODUSA TEL - WA."

3 **Q. AFTER IDENTIFYING THE NUMBERS AS BEING ASSOCIATED WITH**
4 **MCLEOD, WHAT DID YOU DO?**

5 A. I then used our TGMU records to see how many calls and minutes of use (MOU)
6 were being terminated from the calling number of 360-232-0041 or 360-918-
7 0038. I found that the traffic volumes were extremely large. Attached is a
8 spreadsheet that I presented at the WUTC least cost routing workshop that shows
9 the call volumes and MOU for 2010 and for January to June for 2011. I have also
10 freshened that data to include the total call volumes and MOU for 2011. I have
11 noticed that the volume of traffic associated with each number has steadily grown
12 every month. The material is attached as Exhibit No. ____ (RV-2C).

13
14 In additional research and testing we have found that the calling number of 360-
15 232-0041 or 360-918-0038 is used by more than magicjack. This number is used
16 as a least cost routing termination for CLECs and IXC.

17 **Q. IS THERE ANY PHYSICAL DIFFERENCE IN THE MESSAGES THAT**
18 **ARE RECEIVED THROUGH MCLEOD COMPARED TO MESSAGES**
19 **THAT ARE RECEIVED FROM OTHER INTEREXCHANGE CARRIERS**
20 **IN THE WAY THAT TRAFFIC REACHES KALAMA AND TENINO?**

21 A. No. The traffic reaches us on a common toll trunk group just like any
22 interexchange call would reach us. That trunk group comes from the
23 Qwest/CenturyLink access tandem and is delivered to either Tenino or Kalama

1 for termination. I will note that Tenino and Kalama are in separate LATAs so
2 that the tandems are different, but the manner of the way in which the traffic
3 flows looks like any interexchange call.

4 **Q. ARE THERE ANY DIFFERENCES IN THE WAY YOUR SWITCH**
5 **HANDLES THE CALL?**

6 A. I am not a central office person. However, in discussing this with our central
7 office personnel, my understanding is no. In addition, Mr. Oblizalo and Mr.
8 Merten's Testimony supports that conclusion as well.

9 **Q. IS THE ISSUE OF TRAFFIC NOT BEING ABLE TO BE IDENTIFIED**
10 **FOR ACCESS BILLING PURPOSES A SERIOUS ISSUE?**

11 A. Yes. It has been an issue that has been growing for a long time. Attached as
12 Exhibit No. ____ (RV-3) is an exhibit that shows the growth over time of
13 unbillable traffic, at least in the sense that it does not contain the information that
14 makes it susceptible to CABs billing as provided by the tandem operator. There
15 has been a nearly exponential rate of growth and a corresponding decline in
16 actually reported access messages from the tandem operator.

17 **Q. HAVE YOU REVIEWED THE INFORMATION PROVIDED BY PAETEC**
18 **AND MCLEOD IN RESPONSE TO DATA REQUESTS 1-5 AND 1-6?**

19 A. Yes. I have attached an exhibit which summarizes the calling to both Kalama and
20 Tenino. That exhibit is Exhibit No. ____ (RV-4C).

21 **Q. DO YOU AGREE WITH THE INFORMATION PRESENTED?**

22 A. Yes and no. I agree that the total volume is very close to what I have tracked.
23 However, I do not agree with the traffic that they describe as TDM. Time

1 division multiplexing or TDM is traditional voice calling for originating. That
2 volume of traffic appears to be much lower than I would expect it to be, just given
3 the number of test calls we did, let alone other sources of TDM calling.

4 **Q. WHAT IS THE FINANCIAL IMPACT TO KALAMA AND TENINO?**

5 A. Mr. Phillips has testimony on that point. I have reviewed the information as it
6 relates to Tenino and Kalama and agree with his presentation.

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

8 A. Yes.