

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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**IN THE MATTER OF THE PETITION OF )  
SPRINT COMMUNICATIONS COMPANY )  
L.P. FOR ARBITRATION OF ) DOCKET NO. UT-003006  
INTERCONNECTION RATES, TERMS, )  
CONDITIONS AND RELATED )  
ARRANGEMENTS WITH U S WEST )  
COMMUNICATIONS, INC. )**

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**REBUTTAL TESTIMONY OF**

**JOSEPH CRAIG**

**ON BEHALF OF U S WEST COMMUNICATIONS, INC.**

**May 10, 2000**

1 **I.INTRODUCTION**

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3 **Q. PLEASE STATE YOUR NAME.**

4 A. My name is Joseph Craig.

5

6 **Q. ARE YOU THE SAME JOSEPH CRAIG THAT PREVIOUSLY FILED**  
7 **DIRECT TESTIMONY IN THIS CASE?**

8 A. Yes, I am.

9

10 **Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY.**

11 **A.My testimony responds to issues raised in the direct testimony of Sprint’s witness,**  
12 **David Stahly, relating to the costs of delivering Internet-bound traffic and how this**  
13 **type of traffic can be separated technically from voice traffic. My direct testimony**  
14 **addresses all other network-related issues having to do with the costs of delivering**  
15 **this type of traffic.**

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17 **II. REBUTTAL TESTIMONY REGARDING RECIPROCAL**  
18 **COMPENSATION FOR ISP TRAFFIC**

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20 **Q. AT PAGES 13 AND 14 OF HIS DIRECT TESTIMONY, MR. STAHLY**  
21 **ASSERTS THAT BECAUSE INCUMBENT LOCAL EXCHANGE**  
22 **CARRIERS ("ILECs") HAVE LARGER NETWORKS THAN**



1 the direct testimony of Larry Brotherson at pages 12 through 14, U S WEST is already  
2 identifying and measuring Internet-bound calls separately from voice calls through the  
3 use of a three-step process involving: (1) collection of call data through the use of the  
4 CroSS7 system designed by Aligent, formerly known as Hewlett Packard; (2)  
5 identification of modem traffic through application of an algorithm to the data generated  
6 by CroSS7; and (3) use of a modem identifier to determine whether calls initially  
7 identified as modem traffic after application of the algorithm are, in fact, Internet-bound  
8 calls. In the Colorado arbitration between U S WEST and Sprint, the Colorado  
9 Commission found that this process allows U S WEST to identify Internet traffic from  
10 other traffic:

11 "In adopting bill and keep, the Commission believes that U S WEST will be able to differentiate  
12 ISP traffic from the traffic between U S WEST and Sprint that is subject to reciprocal  
13 compensation. Such differentiation is necessary because the two types of traffic will be treated  
14 differently. The procedure for differentiating the two was explained by witnesses for U S WEST,  
15 and we find this method to be reasonably designed to measure ISP traffic."  
16

17 **In the Matter of the Petition of Sprint Communications Co. for Arbitration, Docket**  
18 **No. 00B-011T, Decision No. C00-479, Initial Commission Decision at 18 (Adopted**  
19 **May 3, 2000).**

20  
21 Second, in addition to the process U S WEST has implemented, Internet-bound  
22 traffic can be identified if ILECs and CLECs share the direct-dialed numbers of  
23 Internet providers. If Sprint provided U S WEST with the numbers of the ISPs it  
24 serves, for example, U S WEST could route Internet-bound traffic over separate

1 trunk groups used for the exchange of Internet-bound traffic. Any competitive  
2 concerns that CLECs may have about turning over these numbers could be  
3 addressed through procedures U S WEST has in place to handle information of  
4 this type and to ensure that the information is used only for the purposes of  
5 identifying and measuring traffic. U S WEST used these procedures, for example,  
6 in connection with number portability to ensure that telephone numbers provided  
7 by CLECs were used only for implementing number portability.

8  
9 **Third, since the FCC has ruled that not all locally dialed numbers are local calls,**  
10 **ISP numbers can be assigned unique, three-digit number prefixes. This alternative**  
11 **would use a numbering plan similar to Feature Group A service. This approach**  
12 **would allow ILECs and CLECs to route Internet-bound calls using this unique**  
13 **prefix to a separate trunk group away from voice calls.**

14  
15 **Finally, another option would be to use a separate and distinct Line Class Code for**  
16 **Internet calls. Line Class Codes are used to identify originating and terminating**  
17 **features or restrictions on customer lines. Measured service or flat rate service is an**  
18 **example of service type, and 976 or toll-dialing restrictions are examples of**  
19 **originating restrictions using Line Class Codes. With the use of a measured Line**  
20 **Class Code for computer lines, all data traffic originating from a computer could be**  
21 **measured and reported separately from voice calls.**

1

2 **In summary, there are a number of technically feasible options available to identify**  
3 **and measure Internet-bound calls. U S WEST has implemented one of these**  
4 **methods, and, as the Colorado Commission found, it allows U S WEST to track**  
5 **Internet traffic separately from voice traffic.**

6

7 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

8 A. Yes.