

-----Original Message-----

**From:** Vickie Norris [mailto:vickie.norris@CenturyTel.com]

**Sent:** Tuesday, May 16, 2006 1:06 PM

**To:** Isiogu, Orjiakor N (DLEG)

**Subject:** FW: VNXX Workgroup Preliminary Report and Recommendations

Orji - Cal and I have reviewed the Staff draft & think you guys did a good job of both describing the issues and the various parties' positions! Cal did have a minor point - see below - that you might want to consider.

Thanks to you and your staff for all the hard work and attention you all spent on this issue.

Vickie Norris  
Director, Government Relations  
CenturyTel (Indiana, Michigan & Ohio)  
17 South High Street, Suite 600  
Columbus, OH 43215  
614-221-5354  
FAX 614-221-5227

-----Original Message-----

**From:** Calvin Simshaw

**Sent:** Monday, May 15, 2006 8:24 PM

**To:** Vickie Norris; Guy Miller

**Cc:** John Jones

**Subject:** RE: VNXX Workgroup Preliminary Report and Recommendations

Vickie:

I think that Orji and the MPSC Staff did a very commendable job of describing the various issues and the parties' positions thereon. I did not see anything in the draft that caused me any great concern.

A minor point would be that I noted that the draft mentions that the CLEC Group asserted that ILEC callers were the cost causer related to VNXX traffic. CTL and others consistently made the point that CLECs and their ISP customer were in fact the cost causers related to VNXX traffic (the CLECs and not the ILECs derive revenue from this traffic). However, the draft does not mention this. Therefore the only statement as to cost causer reflected in the draft is that of the CLEC group. It may be that MECA did not address the issue of cost causer in its final comments and Orju and MPSC Staff were working mainly from final comments and that is why the CTL/RLEC position on cost causer did not get mentioned.

Calvin Simshaw  
CenturyTel Legal Department  
360-905-5958

calvin.simshaw@centurytel.com

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*The information in this e-mail is confidential and may be protected by the attorney's work product doctrine or the attorney/client privilege.*  
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-----Original Message-----

**From:** Vickie Norris

**Sent:** Thursday, May 11, 2006 9:32 AM

**To:** Calvin Simshaw; Guy Miller

**Cc:** John Jones

**Subject:** FW: VNXX Workgroup Preliminary Report and Recommendations

Cal - I'll keep you posted on any comments from TAM or MECA on the attached Commission draft VNXX report. If you see anything glaring that we want to make sure we comment on, please let me know. I'll be back in the office on Monday and will be able to either submit our comments or make sure they get in the MECA comments.

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Director, Government Relations  
CenturyTel (Indiana, Michigan & Ohio)  
17 South High Street, Suite 600  
Columbus, OH 43215  
614-221-5354  
FAX 614-221-5227

-----Original Message-----

**From:** Pearce, Christina M (DLEG) [mailto:cmpearc@michigan.gov]

**Sent:** Tuesday, May 09, 2006 4:32 PM

**To:** Vickie Norris; info@mecaone.com; RNelson@fraserlawfirm.com; bstewart@ctstelecom.com; fred@andersongr.net; glfield@glfieldlaw.com; messing@millercanfield.com; james.denniston@mci.com; Jerry Finefrock; jjreidy@att.com; Kelley, Matthew; schoen.kevin@acd.net; linda.hymans@neustar.biz; mark.iannuzzi@telnetww.com; mcf@acd.net; richard\_wolfe@cable.comcast.com; rmccausland@sagetelecom.net; rg1467@sbc.com; Rogers, Greg; Stevenson.scott@telecommich.org; Sherry Lichtenberg (sherry.lichtenberg@mci.com); Strumberger, Gregg; toddg@iserv.net; Woolcock, Susana (DLEG); Durbin, Elizabeth C (DLEG); Hughey, Steven; Ianni, Robert; Isiogu, Orjiakor N (DLEG); Robert Munoz; Thelen, Wendy J (DLEG); Vernon Southmayn; Wilder, Marjorie J (DLEG)

**Subject:** VNXX Workgroup Preliminary Report and Recommendations

Attached is the Draft VNXX Workgroup Preliminary Report and Recommendations prepared by MPSC Staff. As previously discussed, please provide staff with your comments by May 16, 2006.

Thank you for your attention to the enclosed.

Chrissie Pearce  
Telecommunications Division  
Michigan Public Service Commission  
(517) 241-6233

5/17/06 email:

CenturyTel has the following reply to the CLEC group comments:

The CLEC group makes the following statement at page 2 of their comments.

The description of VNXX traffic on page 6 should be revised. The Report gives an example of a customer in Jackson that has been assigned a Lansing NXX phone number. The Report indicates that "the call actually terminates in Jackson and must travel over interexchange facilities to reach the called party." The later statement is inaccurate. The call does not travel over interexchange facilities from Lansing to Jackson to terminate. The Lansing to Jackson leg of the call would be carried by the CLEC over local interconnection trunks owned or leased by the CLEC. The Report should make this correction.

They are incorrect. The MPSC Staff had it correct. The call would travel from Jackson to Lansing on interexchange facilities. The only way it would travel on interconnection trunks owned or leased by the CLEC is if the CLEC agreed to have a Point of Interconnection in the Jackson exchange. They typically refuse to do this, claiming instead that they only have to have one POI in the LATA. That single POI will typically not be in the exchange where the VNXX call originates.

The language change advocated by the CLEC group does not reflect the typical VNXX arrangement in Michigan and should not be made.

Calvin Simshaw  
CenturyTel Legal Department  
360-905-5958

Vickie Norris  
Director, Government Relations  
CenturyTel (Indiana, Michigan & Ohio)  
17 South High Street, Suite 600  
Columbus, OH 43215  
614-221-5354  
FAX 614-221-5227

-----Original Message-----

**From:** Pearce, Christina M (DLEG) [mailto:cmpearc@michigan.gov]

**Sent:** Wednesday, May 17, 2006 10:28 AM

**To:** Vickie Norris; info@mecaone.com; RNelson@fraserlawfirm.com; bstewart@ctstelecom.com; fred@andersongr.net; glfield@glfieldlaw.com; messing@millercanfield.com; james.denniston@mci.com; Jerry Finefrock; jjreidy@att.com; Kelley, Matthew; schoen.kevin@acd.net; linda.hymans@neustar.biz; mark.iannuzzi@telnetww.com; mcf@acd.net; richard\_wolfe@cable.comcast.com; rmccausland@sagetelecom.net; rg1467@sbc.com; Rogers, Greg; Stevenson.scott@telecommich.org; Sherry Lichtenberg (sherry.lichtenberg@mci.com); Strumberger, Gregg; toddg@iserv.net; Woolcock,

Susana (DLEG); Durbin, Elizabeth C (DLEG); Hughey, Steven; Ianni, Robert; Isiogu, Orjiakor N (DLEG); Robert Munoz; Thelen, Wendy J (DLEG); Vernon Southmayn; Wilder, Marjorie J (DLEG)

**Subject:** Comments

When submitting comments, please be sure to send a copy to both Orji and staff (Liz Durbin, Marge Wilder, Wendy Thelen, and Susana Woolcock). Thank you.

Chrissie Pearce  
Telecommunications Division  
Michigan Public Service Commission  
(517) 241-6233

5/17/06 email:

CenturyTel's most recent submission (below) inadvertently reversed the direction of the call described in the example at page 6 of the Preliminary Draft (the VNXX call was described in the Preliminary Draft as going from Lansing to Jackson and not from Jackson to Lansing). However, CenturyTel's point remains the same. CLECs typically refuse to establish a POI in the originating exchange (the exchange where they have rated the VNXX number that they have assigned to their ISP customer). claiming instead that they only have to have one POI in the LATA. That single POI will typically not be in the exchange where the VNXX call originates. The most typical arrangement will have the single POI in the larger exchange with the VNXX rated to the smaller exchange where there is no POI and where the VNXX calls will originate.

Therefore the VNXX call would most commonly go over interexchange facilities and not over facilities owned or leased by the CLEC.

Calvin Simshaw  
CenturyTel Legal Department  
360-905-5958

calvin.simshaw@centurytel.com

-----Original Message-----

**From:** Vickie Norris

**Sent:** Wednesday, May 17, 2006 7:54 AM

**To:** Pearce, Christina M (DLEG); info@mecaone.com; RNelson@fraserlawfirm.com; bstewart@ctstelecom.com; fred@andersongr.net; glfield@glfieldlaw.com; messing@millercanfield.com; james.denniston@mci.com; Jerry Finefrock; jjreidy@att.com; Kelley, Matthew; schoen.kevin@acd.net; linda.hymans@neustar.biz; mark.iannuzzi@telnetww.com; mcf@acd.net; richard\_wolfe@cable.comcast.com; rmccausland@sagetelecom.net; rg1467@sbc.com; Rogers, Greg; Stevenson.scott@telecommich.org; Sherry Lichtenberg (sherry.lichtenberg@mci.com); Strumberger, Gregg; toddg@iserv.net; Woolcock, Susana (DLEG); Durbin, Elizabeth C (DLEG); Hughey, Steven; Ianni, Robert; Isiogu, Orjiakor N (DLEG); Robert Munoz; Thelen, Wendy J (DLEG); Vernon Southmayn; Wilder, Marjorie J (DLEG)

**Cc:** Calvin Simshaw  
**Subject:** RE: Comments

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Susana (DLEG); Durbin, Elizabeth C (DLEG); Hughey, Steven; Ianni, Robert; Isiogu, Orjiakor N (DLEG); Robert Munoz; Thelen, Wendy J (DLEG); Vernon Southmayn; Wilder, Marjorie J (DLEG)

**Subject:** Comments

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Chrissie Pearce  
Telecommunications Division  
Michigan Public Service Commission  
(517) 241-6233

5/17/06 email:

Cal,

Thanks for confirming that the ISPs/CLECs/MiAct comment regarding page 6 of the draft report was accurate. I'm sure we will time to discuss this issue further when the Work Group meets next week.

--Gary.

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Gary L. Field  
Law Office of Gary L. Field, PLLC  
915 N. Washington Avenue  
Lansing, MI 48906  
glfield@glfieldlaw.com  
(517) 913-5100 Phone  
(517) 913-3471 Fax

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