

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

**RE:**

**Docket No. 19-00099**

**AT&T Tennessee Complaint Against  
Cellular South, Inc. d/b/a C Spire**

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**AT&T TENNESSEE RESPONSES TO  
C SPIRE'S MARCH 2, 2020, DISCOVERY REQUESTS**

**Response Provided March 11, 2020**

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BellSouth Telecommunications, LLC d/b/a AT&T Tennessee ("AT&T"), submits the following responses to the discovery requests of Cellular South, Inc. d/b/a C Spire ("C Spire").

**C Spire Request No. 1 - For each month during the period January 2016 through September 2017, describe how BellSouth calculated the total amount due for the Two-Way Trunk Group Arrangement pursuant to Section V.B of the Interconnection Agreement ("ICA") referred to in AT&T's Complaint. Include in your answer "the number of minutes of traffic identified as BellSouth's" and the "total minutes of use on the facility" as described in Section V.B of the ICA.**

**AT&T TENNESSEE RESPONSE:**

Since the inception of the Interconnection Agreement ("ICA"), AT&T has consistently followed the exact process set forth at ICA paragraph V.B to calculate the shared facility factors provided to C Spire. The data are gathered via the same mechanized systems using the same programming since the ICA began. To the best of AT&T's knowledge, information and belief, C Spire has not challenged or questioned the operation of those systems, or the data they have generated, since the ICA was implemented September 1, 2003.

Per ICA paragraph V.B, "BellSouth [now AT&T] and [C Spire] . . . share the cost of the two-way trunk group carrying both Parties [sic] traffic proportionately. [AT&T] will bear the cost of the two-way trunk group for the proportion of the facility utilized for the delivery of [AT&T] originated Local Traffic to [C Spire's] POI within [AT&T's] service territory (calculated based on the number of minutes of traffic identified as [AT&T's] divided by the total minutes of use on the facility), and [C Spire] will provide or bear the cost of the two-way trunk group for all other traffic, including intermediary traffic."

Thus, in accordance with the ICA, AT&T's systems capture minutes of use ("MOUs") for the AT&T-originated Local Traffic (which includes both local exchange calls originated by AT&T end users and intraLATA toll traffic where customers have selected AT&T as their presubscribed intraLATA toll provider), as well as all other traffic that traverse the two-way facilities subject to the ICA. AT&T is obligated to pay C Spire the percentage of the cost of the two-way trunks equal to the ratio of the AT&T originated local traffic to the sum of the AT&T-originated local traffic plus all other traffic carried over the two-way trunks.

AT&T has provided C Spire with quarterly traffic totals for the period identified, separated by "AT&T originated Local Traffic" and "All Traffic." The ratio of the AT&T originated Local Traffic to All Traffic identifies the percentage of the two-way facilities for which AT&T is responsible.

AT&T does not have monthly MOU data for the AT&T originated local traffic and total traffic associated with the two-way trunks for the time period identified in the question. In general, AT&T retains traffic information for a rolling two-year period, but for the time period covered by this question AT&T has maintained quarterly MOU information given the dispute between the parties. AT&T has a high degree of confidence in the accuracy of the shared facility factors it has provided C Spire for the time period January 2016 through September 2017. As indicated above, AT&T's systems gather the relevant data in the same way every month. If C Spire is interested in reviewing the methodology AT&T uses to gather monthly data, AT&T can make available monthly data for the last two years. Review of that information will help C Spire confirm that the quarterly data AT&T provided for January 2016, through September 2017, is accurate. *See also* AT&T's response to C Spire Request No. 3.

The crux of the dispute in this case is that AT&T did not provide actual shared facility factors for the months at issue until October 19, 2017. The reason AT&T did not do so is very straightforward. As a result of retirements and realignments of work responsibilities, the person who had been providing the shared facility factors for the prior several years was no longer responsible for that work, and the replacement did not realize that providing C Spire with quarterly shared facility factors was now one of the assigned work duties. Each month AT&T deals with hundreds of carriers on thousands of transactions occurring under hundreds of Interconnection Agreements, and in the vast majority of instances those transactions occur exactly as set forth in the applicable ICA. In this one instance, however, AT&T did not provide the shared facility factors as it had for more than a decade, and C Spire, for its part, continued to bill AT&T each quarter using the last factor AT&T had provided. Once the oversight came to light – which occurred when an AT&T supervisor reviewing C Spire transactions realized something was amiss – AT&T provided C Spire with the *actual* shared facility factors for each of the quarters in question. As set forth in AT&T's Complaint, application of those actual factors to the cost of the shared facilities meant that AT&T was due a refund for the period in question.

**C Spire Request No. 2 - For the months of January 2016, September 2016 and September 2017, describe and quantify all of the various types of traffic included in the "total minutes of use on the facility" described in Section V.B of the ICA. The terms describing such traffic should, unless otherwise explained, be consistent with the definitions of those terms in the ICA.**

**AT&T TENNESSEE RESPONSE:**

Types of traffic included in the total minutes of use on the facility include:

- BellSouth originated traffic
- C Spire originated traffic
- Intermediary traffic sent in both directions.

*See also AT&T Tennessee's Response to C Spire Request No. 1, incorporated by reference. As explained in that response, AT&T's calculations of the shared facility factor are performed exactly as set forth in the ICA, using automated systems that pull data in the same way every month, including for the three months identified in this discovery request. See also AT&T's response to C Spire Request Nos. 3 and 4.*

**C Spire Request No. 3 - For the months of January 2016, September 2016, and September, 2017, describe and quantify the minutes of "Intermediary Traffic" as defined in Section I.C of the ICA. Include in your answer the identity of every originating and terminating carrier, including local exchange carriers, competitive local exchange carriers, and CMRS providers if that carrier originated or terminated more than 1 % of the minutes of Intermediary Traffic".**

**AT&T TENNESSEE RESPONSE:**

AT&T no longer has a record of the Intermediary Traffic for the three months identified in the request. *See AT&T's response to C Spire Request No. 1, incorporated by reference. To help C Spire understand the sources and quantities of Intermediary Traffic carried over the shared facilities, AT&T has attached to this response an Excel spreadsheet showing the traffic sources and MOUs for all traffic carried over the Tennessee shared facilities in the Fourth Quarter 2019.*

**C Spire Request No. 4 - During the period July 2016 through September 2017, did BellSouth originate and deliver any Intermediary Traffic to C Spire? If so, provide the minutes delivered in each month.**

**AT&T TENNESSEE RESPONSE:**

No. Per the definition of Intermediary Traffic at paragraph I.C of the ICA, intermediary traffic does not include traffic originated by AT&T. *See* AT&T's response to C Spire Request No. 3, incorporated by reference.

Respectfully submitted, this 11th day of March, 2020.

By:



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*BellSouth Telecommunications, LLC d/b/a AT&T Tennessee*

**CERTIFICATE OF SERVICE**

I, Jeremey R. Goolsby, attorney of record for BellSouth Telecommunications, LLC d/b/a AT&T Tennessee, hereby certify that I have this day caused to be filed and delivered by U.S. Mail and electronic mail, a copy of the above and foregoing document to:

**ATTORNEYS FOR CELLULAR SOUTH, INC.**

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This 11th day of March, 2020.

  
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Jeremy R. Goolsby

**BLS PLF Quarterly Report**

<u>Quarter</u>	<u>ICO ID</u>	<u>Bell South</u>	<u>Total</u>	<u>PLF</u>
		<u>Traffic</u>	<u>Traffic</u>	
4Q 2019	TN6581	331,603	11,842,647	3%

<u>Column Header</u>	<u>Definition</u>
Wireless OCN	Wireless OCN
Wireless Company Name	Wireless ICO Name
Bell South Traffic MOU	Bell South Originated Traffic in Minutes of Use (MOU)
Total Traffic MOU	All Traffic MOU across the trunks
Carrier A OCN	Either Originating or Terminating Carrier ID, relative to Carrier B
Carrier B OCN	Either Originating or Terminating Carrier ID, relative to Carrier A
BOS JUR	BOS Jurisdiction Value (5 = Local)
MSG DATE	Month of Data

Wireless OCN	Wireless Company NAME	Bell South Traffic MOU	Total Traffic MOU	Carrier A OCN	Carrier B OCN	BOS JUR	MSG DATE
TN6581	CELLULAR SOUTH	0	10 LA8994	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	1 LA8994	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	2 LA8994	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	7 TN	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	188 TN	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	1 TN	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	368 TN	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	21 TN	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	472 TN	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	19 TN0222	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	5 TN0288	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	55 TN0288	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	15 TN0288	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	2 TN0432	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	3 TN0555	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	18 TN0555	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	3 TN0555	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	53 TN076B	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	28 TN076B	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	10 TN1739	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	5 TN076B	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	2 TN0811	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	15 TN1739	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	1 TN1739	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	2 TN234A	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	7 TN2372	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	16 TN2372	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	20 TN2372	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	3 TN2891	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	32 TN314F	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	2 TN314F	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	5 TN314F	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	728 TN3290	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	1,013 TN3290	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	610 TN3290	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	0 TN3452	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	608 TN403D	TN6581	TN6581	5	20191130
TN6581	CELLULAR SOUTH	0	303 TN403D	TN6581	TN6581	5	20191231
TN6581	CELLULAR SOUTH	0	262 TN403D	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	1 TN408D	TN6581	TN6581	5	20191031
TN6581	CELLULAR SOUTH	0	1 TN4110	TN6581	TN6581	5	20191031





TN6581	CELLULAR SOUTH	0	3	TN6581	20191231
TN6581	CELLULAR SOUTH	0	177	TN6581	20191031
TN6581	CELLULAR SOUTH	0	90	TN6581	20191130
TN6581	CELLULAR SOUTH	0	89	TN6581	20191231
TN6581	CELLULAR SOUTH	0	1	TN6581	20191031
TN6581	CELLULAR SOUTH	0	2	TN6581	20191130
TN6581	CELLULAR SOUTH	0	138	TN6581	20191031
TN6581	CELLULAR SOUTH	0	18	TN6581	20191130
TN6581	CELLULAR SOUTH	0	51	TN6581	20191231
TN6581	CELLULAR SOUTH	0	18	TN6581	20191031
TN6581	CELLULAR SOUTH	0	3	TN6581	20191130
TN6581	CELLULAR SOUTH	0	2	TN6581	20191231
TN6581	CELLULAR SOUTH	0	15	TN6581	20191031
TN6581	CELLULAR SOUTH	0	8	TN6581	20191130
TN6581	CELLULAR SOUTH	0	0	TN6581	20191231
TN6581	CELLULAR SOUTH	0	50	TN6581	20191031
TN6581	CELLULAR SOUTH	0	243	TN6581	20191130
TN6581	CELLULAR SOUTH	0	81	TN6581	20191231
TN6581	CELLULAR SOUTH	0	12	TN6581	20191031
TN6581	CELLULAR SOUTH	0	5	TN6581	20191130
TN6581	CELLULAR SOUTH	0	12	TN6581	20191231
TN6581	CELLULAR SOUTH	0	5	TN6581	20191031
TN6581	CELLULAR SOUTH	0	73	TN6581	20191130
TN6581	CELLULAR SOUTH	0	4	TN6581	20191231
TN6581	CELLULAR SOUTH	0	104	TN6581	20191031
TN6581	CELLULAR SOUTH	0	59	TN6581	20191130
TN6581	CELLULAR SOUTH	0	144	TN6581	20191231
TN6581	CELLULAR SOUTH	0	11	TN6581	20191031
TN6581	CELLULAR SOUTH	0	4	TN6581	20191130
TN6581	CELLULAR SOUTH	0	7	TN6581	20191231
TN6581	CELLULAR SOUTH	0	643	TN6581	20191031
TN6581	CELLULAR SOUTH	0	383	TN6581	20191130
TN6581	CELLULAR SOUTH	0	610	TN6581	20191231
TN6581	CELLULAR SOUTH	0	1	TN6581	20191031
TN6581	CELLULAR SOUTH	0	12	TN6581	20191130
TN6581	CELLULAR SOUTH	0	7	TN6581	20191231
TN6581	CELLULAR SOUTH	0	32	TN6581	20191031
TN6581	CELLULAR SOUTH	0	14	TN6581	20191130
TN6581	CELLULAR SOUTH	0	22	TN6581	20191231
TN6581	CELLULAR SOUTH	0	3	TN6581	20191031
TN6581	CELLULAR SOUTH	0	16	TN6581	20191130
TN6581	CELLULAR SOUTH	0	10	TN6581	20191231



TN6581	56	CELLULAR SOUTH	TN4110	20191031
TN6581	8	CELLULAR SOUTH	TN4110	20191130
TN6581	21	CELLULAR SOUTH	TN4110	20191130
TN6581	0	CELLULAR SOUTH	TN4110	20191231
TN6581	42	CELLULAR SOUTH	TN4110	20191231
TN6581	0	CELLULAR SOUTH	TN4336	20191031
TN6581	0	CELLULAR SOUTH	TN4336	20191130
TN6581	0	CELLULAR SOUTH	TN4336	20191231
TN6581	14	CELLULAR SOUTH	TN4388	20191231
TN6581	30	CELLULAR SOUTH	TN4622	20191031
TN6581	0	CELLULAR SOUTH	TN4622	20191130
TN6581	0	CELLULAR SOUTH	TN4622	20191231
TN6581	143	CELLULAR SOUTH	TN4622	20191231
TN6581	204	CELLULAR SOUTH	TN4622	20191231
TN6581	14	CELLULAR SOUTH	TN4645	20191031
TN6581	30	CELLULAR SOUTH	TN4645	20191130
TN6581	0	CELLULAR SOUTH	TN4645	20191231
TN6581	0	CELLULAR SOUTH	TN4645	20191231
TN6581	0	CELLULAR SOUTH	TN476C	20191130
TN6581	0	CELLULAR SOUTH	TN476C	20191231
TN6581	0	CELLULAR SOUTH	TN476C	20191231
TN6581	3	CELLULAR SOUTH	TN4892	20191031
TN6581	0	CELLULAR SOUTH	TN4892	20191130
TN6581	0	CELLULAR SOUTH	TN4892	20191231
TN6581	0	CELLULAR SOUTH	TN4892	20191231
TN6581	0	CELLULAR SOUTH	TN5102	20191031
TN6581	0	CELLULAR SOUTH	TN5102	20191130
TN6581	0	CELLULAR SOUTH	TN5102	20191231
TN6581	0	CELLULAR SOUTH	TN5237	20191031
TN6581	0	CELLULAR SOUTH	TN5237	20191130
TN6581	0	CELLULAR SOUTH	TN525E	20191031
TN6581	0	CELLULAR SOUTH	TN525E	20191130
TN6581	0	CELLULAR SOUTH	TN525E	20191231
TN6581	0	CELLULAR SOUTH	TN525E	20191231
TN6581	0	CELLULAR SOUTH	TN525E	20191231
TN6581	0	CELLULAR SOUTH	TN5390	20191031
TN6581	0	CELLULAR SOUTH	TN5390	20191130
TN6581	0	CELLULAR SOUTH	TN5390	20191231
TN6581	0	CELLULAR SOUTH	TN540E	20191031
TN6581	0	CELLULAR SOUTH	TN5438	20191031
TN6581	2	CELLULAR SOUTH	TN5438	20191130
TN6581	8	CELLULAR SOUTH	TN5438	20191231
TN6581	56	CELLULAR SOUTH	TN5506	20191031
TN6581	6	CELLULAR SOUTH	TN5506	20191130



TN6581	CELLULAR SOUTH	0	1,782	TN6581	20191031
TN6581	CELLULAR SOUTH	0	0	0	20191130
TN6581	CELLULAR SOUTH	0	0	0	20191130
TN6581	CELLULAR SOUTH	0	1,521	TN6581	20191231
TN6581	CELLULAR SOUTH	0	1,369	TN6581	20191031
TN6581	CELLULAR SOUTH	0	1	TN6581	20191130
TN6581	CELLULAR SOUTH	0	12	TN6581	20191231
TN6581	CELLULAR SOUTH	0	3	TN6581	20191231
TN6581	CELLULAR SOUTH	0	66	TN6581	20191031
TN6581	CELLULAR SOUTH	0	43	TN6581	20191130
TN6581	CELLULAR SOUTH	0	52	TN6581	20191231
TN6581	CELLULAR SOUTH	0	5	TN6581	20191031
TN6581	CELLULAR SOUTH	0	271	TN6581	20191031
TN6581	CELLULAR SOUTH	0	6	TN6581	20191130
TN6581	CELLULAR SOUTH	0	124	TN6581	20191130
TN6581	CELLULAR SOUTH	0	7	TN6581	20191231
TN6581	CELLULAR SOUTH	0	218	TN6581	20191231
TN6581	CELLULAR SOUTH	0	23	TN6581	20191031
TN6581	CELLULAR SOUTH	0	14	TN6581	20191130
TN6581	CELLULAR SOUTH	0	15	TN6581	20191231
TN6581	CELLULAR SOUTH	0	17	TN6581	20191031
TN6581	CELLULAR SOUTH	0	2	TN6581	20191231
TN6581	CELLULAR SOUTH	0	3	TN6581	20191031
TN6581	CELLULAR SOUTH	0	1	TN6581	20191130
TN6581	CELLULAR SOUTH	0	1	TN6581	20191231
TN6581	CELLULAR SOUTH	0	117	TN6581	20191031
TN6581	CELLULAR SOUTH	0	179	TN6581	20191130
TN6581	CELLULAR SOUTH	0	1	TN6581	20191231
TN6581	CELLULAR SOUTH	0	191	TN6581	20191231
TN6581	CELLULAR SOUTH	0	5	TN6581	20191031
TN6581	CELLULAR SOUTH	0	453	TN6581	20191130
TN6581	CELLULAR SOUTH	0	19,520	TN6581	20191031
TN6581	CELLULAR SOUTH	0	91,234	TN6581	20191231
TN6581	CELLULAR SOUTH	1	1	TN6581	20191231
TN6581	CELLULAR SOUTH	14	14	TN6581	20191231
TN6581	CELLULAR SOUTH	347	347	TN6581	20191231
TN6581	CELLULAR SOUTH	17,971	17,971	TN6581	20191130
TN6581	CELLULAR SOUTH	89,368	89,368	TN6581	20191031
TN6581	CELLULAR SOUTH	19	19	TN6581	20191231
TN6581	CELLULAR SOUTH	51	51	TN6581	20191231
TN6581	CELLULAR SOUTH	407	407	TN6581	20191231
TN6581	CELLULAR SOUTH	18,587	18,587	TN6581	20191231
TN6581	CELLULAR SOUTH	87,161	87,161	TN6581	20191231



TN6581	CELLULAR SOUTH	259	TN936D	0	20191031
TN6581	CELLULAR SOUTH	0	TN936D	5	20191130
TN6581	CELLULAR SOUTH	0	TN936D	5	20191231
TN6581	CELLULAR SOUTH	0	TN936D	5	20191031
TN6581	CELLULAR SOUTH	0	TN9419	0	20191031
TN6581	CELLULAR SOUTH	0	TN9419	18	20191031
TN6581	CELLULAR SOUTH	0	TN9419	76,460	20191031
TN6581	CELLULAR SOUTH	0	TN9419	0	20191130
TN6581	CELLULAR SOUTH	0	TN9419	73,338	20191130
TN6581	CELLULAR SOUTH	0	TN9419	73,777	20191231
TN6581	CELLULAR SOUTH	0	TN9419	8	20191031
TN6581	CELLULAR SOUTH	0	TN9529	4	20191130
TN6581	CELLULAR SOUTH	0	TN9529	6	20191231
TN6581	CELLULAR SOUTH	0	TN9529	1,269	20191031
TN6581	CELLULAR SOUTH	0	TN987A	1,355	20191130
TN6581	CELLULAR SOUTH	0	TN987A	1,812	20191231
TN6581	CELLULAR SOUTH	0	TN9919	0	20191130
TN6581	CELLULAR SOUTH	0	TN9919	15	20191031
TN6581	CELLULAR SOUTH	0	TN9927	9	20191130
TN6581	CELLULAR SOUTH	0	TN9927	23	20191231
		331,603		11,842,647	