

**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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**REBUTTAL TESTIMONY OF  
  
G. W. HODGES  
  
ON BEHALF OF AT&T TENNESSEE**

**April 13, 2020**

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**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is G. W. Hodges. My business address is 722 North Broadway, Room 04M255F, Milwaukee, Wisconsin.

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

A. I am employed by AT&T Services, Inc. as a Lead Billing Ops Manager in the AT&T Communications Finance Department. In my current position, I provide financial assurance for the expense budget for purchases from third party telecommunications providers, with a focus on international business.

**Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

A. I have a Bachelor of Science in Economics from Radford University.

**Q. PLEASE OUTLINE YOUR WORK EXPERIENCE.**

A. I began employment with Ameritech in 1996 as a Process Manager for a retail consumer call center. After a brief hiatus, I rejoined Ameritech in 1999 to manage wholesale contracts from a revenue assurance perspective. This role included development of data feeds and systems for reciprocal compensation expense management, as well as support for disputes. I then transitioned to a lead role for the Reciprocal Compensation Operations team, validating bills from other carriers for the AT&T ILECs. In 2009, I moved to a special project team, providing financial assurance and full profit & loss support, returning to Reciprocal Compensation Operations in 2011. I moved to my current position in 2016.

**Q. IS THIS THE FIRST TIME YOU HAVE TESTIFIED IN A STATE REGULATORY PROCEEDING?**

A. Yes, it is.

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

A. I address specific erroneous assertions in the Direct Testimony of C Spire witness Lee Puckett that was pre-filed in this case on April 6, 2020.

**Q. AS BACKGROUND, WERE YOU INVOLVED IN ANY OF THE EVENTS AT ISSUE IN THIS CASE?**

A. Yes. Between roughly July 2012 and March 2013, in my role with the Reciprocal Compensation Operations team, I participated in transitioning systems and responsibilities related to the shared facilities factor at issue in this case from one group in AT&T to another. In the course of that transition, I was involved in providing C Spire the updated “shared facility factor” that AT&T Tennessee witness Scott McPhee addresses in his pre-filed Direct Testimony.

**Q. WHAT SPECIFIC ASSERTIONS IN MR. PUCKETT’S DIRECT TESTIMONY DO YOU ADDRESS?**

A. I address Mr. Puckett’s erroneous assertions in footnote 9 (at page 5) of his Direct Testimony that “the last actual traffic percentages received by C Spire prior to 2017 arrived on August 22, 2012” and that when I “transferred to a new position,” I allegedly “acknowledged that AT&T would probably cease providing the traffic percentages.”

**Q. HOW DO YOU RESPOND TO MR. PUCKETT’S ASSERTION THAT THE LAST SHARED FACILITY FACTOR AT&T PROVIDED C SPIRE PRIOR TO 2017 WAS PROVIDED IN AUGUST 2012?**

A. Mr. Puckett is simply wrong. After providing a shared facilities factor in August 2012, I sent Mr. Puckett an email in November 2012 providing the updated shared facility factor (40.21%) to be used for Fourth Quarter 2012 billing. *See* attached Exhibit GWH-1.

Then, in February 2013, I emailed Mr. Puckett to advise that I had not yet been able to get the data needed to calculate the updated shared facility factor to be used for First Quarter 2013 billing, and I suggested that C Spire could use the factors I had provided in

November 2012 for Fourth Quarter 2012 billing for current (First Quarter 2013) billing as well. *See* attached Exhibit GWH-2.

**Q. IN YOUR FEBRUARY 2013 EMAIL, DID YOU SUGGEST THAT C SPIRE SHOULD EXPECT THE SHARED FACILITIES FACTOR TO REMAIN RELATIVELY STEADY AS IT WAS UPDATED FOR FUTURE BILLING PERIODS?**

A. No, quite the opposite. I explained that “[f]or the states I did receive [data] *the factors are declining since landline is drying up and wireless is gaining steam,*” thus the proposal for C Spire to use the prior factor (40.21%) for First Quarter 2013 billing “*would be financially beneficial to you.*” *See* Exhibit GWH-2 (emphasis added).

**Q. HOW DO YOU RESPOND TO MR. PUCKETT’S ASSERTION THAT AT SOME POINT YOU TRANSFERRED TO A NEW POSITION AND ACKNOWLEDGED THAT AT&T WOULD PROBABLY CEASE PROVIDING THE TRAFFIC PERCENTAGES?**

A. Mr. Puckett is simply wrong. I did not transfer to a new position during this time period, but my involvement in providing C Spire the updated shared facility factor ceased around the end of March 2013. While I knew that I would no longer be the person to provide the updated shared facility factor to C Spire, I fully anticipated that another person in AT&T would continue providing C Spire the updated factor as I had been doing. I now realize that, as explained by AT&T Tennessee witness Scott McPhee, this mistakenly did not happen, but again, at the time I fully anticipated that AT&T Tennessee would continue providing the updated factor to C Spire, and as I explained to Mr. Puckett in my email of February 2013, I expected the updated factor to decline over time.

**Q. TO BE CLEAR, DID YOU EVER SUGGEST TO MR. PUCKETT OR TO ANYONE ELSE THAT AT&T TENNESSEE WOULD PROBABLY CEASE PROVIDING QUARTERLY UPDATED SHARED FACILITY FACTORS TO C SPIRE?**

**A.** No, I did not.

**Q. DID YOU EVER SUGGEST TO MR. PUCKETT OR TO ANYONE ELSE THAT AT&T WAS WILLING TO HAVE C SPIRE USE A 40.21% SHARED FACILITY FACTOR FOREVER?**

**A.** No, I did not.

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

**A.** Yes, it does.

**From:** [HODGES, G. W.](#)  
**To:** [Lee Puckett](#)  
**Cc:** [HODGES, G. W.](#)  
**Subject:** RE: 3rd Quarter Facility and Recip Percentages  
**Date:** Monday, November 26, 2012 5:27:23 PM  
**Attachments:** [CORR 4Q 2012.xlsx](#)

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As requested Lee - 4Q 2012 CMRS data.

Thanks

GW

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

From: HODGES, G. W.  
Sent: Wednesday, August 22, 2012 9:05 AM  
To: Lee Puckett  
Cc: HODGES, G. W.  
Subject: RE: 3rd Quarter Facility and Recip Percentages

Lee,

3Q 2012 data is attached in the Excel sheet below. We'll get the letters out most likely next week.

GW  
(414)273-8642

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

From: Lee Puckett [<mailto:lpuckett@cspire.com>]  
Sent: Tuesday, August 21, 2012 3:32 PM  
To: HODGES, G. W.  
Subject: RE: 3rd Quarter Facility and Recip Percentages

GW,

Here are the last emails I received. I usually get these by mail also but I never did receive them. Not sure if they got lost or not.

Thanks,  
Lee

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

From: HODGES, G. W. [<mailto:gh1791@att.com>]  
Sent: Tuesday, August 21, 2012 3:26 PM  
To: Lee Puckett  
Subject: RE: 3rd Quarter Facility and Recip Percentages

Lee,

What format did you receive the percentages in last quarter? Can you forward me that e-mail?

Thanks.

GW

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

From: Lee Puckett [<mailto:lpuckett@cspire.com>]  
Sent: Monday, August 20, 2012 1:23 PM  
To: BEVIS, MONICA K; HODGES, G. W.  
Subject: RE: 3rd Quarter Facility and Recip Percentages

GW,

Any luck on finding these percentages for C Spire and Corr Wireless?

Thanks,

Lee Puckett | Financial Analyst - Technical | C Spire Wireless  
1018 Highland Colony Parkway | Suite 330 | Ridgeland, MS 39157  
601.974.7746 office | 769.798.7746 wireless | 601.974.7107 fax cspire.com

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

From: BEVIS, MONICA K [<mailto:mb4280@att.com>]  
Sent: Thursday, August 16, 2012 11:17 AM  
To: HODGES, G. W.  
Cc: Lee Puckett  
Subject: FW: 3rd Quarter Facility and Recip Percentages

GW,

Sorry, but I do not know who took over this responsibility. Can you check on this for Lee? He would need the percentages for both Corr Wireless and Cellular South.

Thanks,  
Monica

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

From: Lee Puckett [<mailto:lpuckett@cspire.com>]  
Sent: Thursday, August 16, 2012 9:29 AM  
To: BEVIS, MONICA K  
Subject: 3rd Quarter Facility and Recip Percentages

Monica,

Who can I contact about the 3rd quarter percentages for recip comp? I don't believe I have received them.

Thanks,

Lee

QUARTER	COMPANY DESC	ST CD	PCT
Q4-2012	Cellular South formerly known as TELEPAK, INC./CTHF	AL	12.02%
Q4-2012	Cellular South formerly known as TELEPAK, INC./CTHF	FL	5.87%
Q4-2012	Cellular South formerly known as TELEPAK, INC./CTHF	MS	14.85%
Q4-2012	Cellular South formerly known as TELEPAK, INC./CTHF	TN	40.21%



**From:** [HODGES, G. W.](#)  
**To:** [Lee Puckett](#)  
**Cc:** [HODGES, G. W.](#)  
**Subject:** RE: 1Q 2013 Facility Percentages for C Spire and Corr Wireless  
**Date:** Monday, February 18, 2013 10:58:34 AM

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Lee,

We had a system conversion and I'm having issues getting the data for all states. For the states I did receive the factors are declining since landline is drying up and wireless is gaining steam.

Would you be OK with using the factors from the last quarter for current billing? It would be financially beneficial for you and would give me a bit of time to figure out why my data isn't flowing into the system.

Let me know and I can send you a formal e-mail and file if that works.

GW

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**From:** Lee Puckett [mailto:[lpuckett@cspire.com](mailto:lpuckett@cspire.com)]  
**Sent:** Thursday, February 14, 2013 1:43 PM  
**To:** HODGES, G. W.  
**Subject:** 1Q 2013 Facility Percentages for C Spire and Corr Wireless

GW,

Can you send me the 1Q facility percentages for C Spire and Corr Wireless.

Thanks,

**Lee Puckett | Financial Analyst - Technical | C Spire Wireless**  
1018 Highland Colony Parkway | Suite 330 | Ridgeland, MS 39157  
601.974.7746 **office** | 769.798.7746 **wireless** | 601.974.7107 **fax**  
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