EXHIBIT
A
BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 12-0550

Direct Testimony of Carl C. Albright, Jr.
On Behalf of AT&T Illinois

AT&T Illinois Exhibit 2.0

PUBLIC

December 5, 2012

ISSUES
1(a), 11, 16, 17, 18, 49
AT&T Illinois maintains that Sprint’s proposed IP-to-IP language should not be included in the ICA.

Q. WHAT DO YOU MEAN WHEN YOU REFER TO “IP-CAPABLE EQUIPMENT”?

A. All the voice traffic that AT&T Illinois currently exchanges with Sprint (and with all other carriers with which it exchanges traffic) is exchanged in Time Division Multiplex format, commonly called “TDM.” On the Internet, in contrast, information (including voice) is in Internet Protocol (“IP”) format. When I say “IP-capable equipment,” I am referring to equipment that can send, receive or process information in IP format, rather than in TDM. As I indicated, today, all traffic that Sprint delivers to AT&T Illinois is delivered in TDM, because AT&T Illinois’ network is a TDM network. When I say that Sprint wants the option of establishing IP-to-IP interconnection, I mean it wants to deliver traffic in IP format to AT&T Illinois via a direct interconnection between IP-capable equipment on Sprint’s network and IP-capable equipment on AT&T Illinois’ network.

Q. WHAT IS THE BASIS FOR AT&T ILLINOIS’ POSITION THAT THE ICA SHOULD NOT ALLOW SPRINT TO ESTABLISH IP-TO-IP INTERCONNECTION WITH AT&T ILLINOIS?

A. There are two separate reasons for AT&T Illinois’ position. One reason is that section 251(c)(2) of the Telecommunications Act of 1996 (“1996 Act”), which requires AT&T Illinois to provide interconnection with its network for Sprint’s equipment, does not encompass or require IP-to-IP interconnection. As a result, AT&T Illinois has no duty (at
least no duty that can be enforced in this arbitration under section 252 of the 1996 Act) to provide IP-to-IP interconnection for Sprint.

The second reason for AT&T Illinois' opposition to Sprint's language is that AT&T Illinois does not have an IP network, i.e., does not have IP-capable equipment with which Sprint could interconnect even if section 251(c)(2) did require incumbent carriers with IP networks to provide interconnection with those networks.

Q. WILL YOU BE SUPPORTING BOTH OF THOSE REASONS IN THIS TESTIMONY?

A. No. The first reason (i.e., that section 251(c)(2) does not require IP-to-IP interconnection) is purely legal, and I do not elaborate on AT&T Illinois' legal position in this testimony. I do note below, however, that the Federal Communications Commission ("FCC") is considering the legal question and that this Commission should not get out ahead of the FCC and does not need to get out ahead of the FCC in order to resolve the issues it needs to resolve in this proceeding. In the testimony that follows, I do show that AT&T Illinois has no IP-capable network for Sprint to interconnect with.

There is no secret about the legal basis for AT&T Illinois' position; it is simply a matter that AT&T Illinois believes is appropriately addressed in legal briefs rather than in testimony. For the benefit of Sprint, Staff and the Administrative Law Judges, however, I am informed by counsel that the basis for AT&T Illinois' position, in abbreviated form, is that under section 251(c)(2), AT&T Illinois is required only to provide interconnection to telecommunications carriers for the transmission and routing of telephone exchange service and exchange access, while the services for which Sprint seeks (hypothetically and in the future) IP-to-IP interconnection are "information services," because they (1) would require a net protocol conversation to allow intercommunication with end users served by the PSTN, and (2) would integrate voice calling with a variety of other functionalities that allow end users to "general[ ] acquire[ ], store[ ], transform[ ], process[ ], retrieve[ ], utilize[ ], make available information via telecommunications" (47 U.S.C. § 153(2)).
A. Yes, but those wholesale customers convert the traffic to TDM format before they deliver the traffic to AT&T Illinois. That is exactly what AT&T Illinois is proposing here: AT&T Illinois is not disputing Sprint’s right to carry traffic in IP format. Before Sprint delivers that traffic to AT&T Illinois, however, it must convert it to TDM, just as AT&T Illinois’ other wholesale customers that carry IP traffic do, and just as Sprint does today.

Q. WHAT ABOUT AT&T ILLINOIS’ RETAIL CUSTOMERS? DOESN’T AT&T ILLINOIS HAVE RETAIL U-VERSE CUSTOMERS WHO ORIGINATE OR TERMINATE VOIP (VOICE OVER INTERNET PROTOCOL) CALLS IN IP FORMAT?

A. Yes, AT&T Illinois does have such customers.

Q. DOESN’T THAT MEAN THAT AT&T ILLINOIS HAS AN IP-CAPABLE NETWORK?

A. No, because the VoIP calls that those customers make and receive are not carried on an AT&T Illinois IP network. Rather, they are carried over the IP network owned by AT&T Illinois’ affiliate, AT&T Corp., which performs the IP-to-TDM conversion.

Q. PLEASE DESCRIBE THE EQUIPMENT AND FACILITIES THAT ARE USED FOR PROVIDING U-VERSE IP SERVICE.

A. A diagram illustrating at a high level the equipment and facilities used for providing U-verse VoIP service is attached as Schedule CCA-1. The Residential Gateway (labeled “2Wire RG”) and the piece of equipment labeled “FTTN,” which is the Internet Protocol Digital Subscriber Line Access Multiplexer (“IP DSLAM”) are owned by AT&T Illinois and are part of AT&T Illinois’ outside plant “local loop” network. The equipment in the
Central Offices, Intermediate Offices and the Video Hub Office ("VHO") is used to aggregate the IP data stream and the video stream into a single data stream for delivery to/from the AT&T U-verse end user. The IP data stream, including VoIP traffic, is carried over special access facilities from the AT&T Illinois VHO to the AT&T Corp. network. AT&T Illinois provides the transport and aggregation for the IP data stream; AT&T Corp. provides the necessary conversion and management of the data within the IP data stream, including any necessary conversion of the VoIP data stream to TDM format if that VoIP call is to be exchanged with the PSTN. The VoIP network, consisting of routers and gateways, is part of AT&T Corp.'s network.

Q. COULD SPRINT ESTABLISH IP INTERCONNECTION AT THE RESIDENTIAL GATEWAY OR THE IP DSLAM?

A. No.

Q. WHY NOT?

A. The Residential Gateway is located within a customer premise and is similar to a modem, performing the functions necessary to provide the customer with U-verse video service, internet service and VoIP depending on the services the customer has purchased. Each U-verse customer has an RG, and the RG takes the incoming data stream for that customer and breaks it out to the individual data services listed above to provide cable TV service via set top boxes connected to each of the customer's televisions, high speed internet to the customer's computer equipment and VoIP to the customer's phones. The RG also combines the customer’s various outgoing data signals such as video pay-per-