

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of QWEST)	
CORPORATION for Arbitration of an)	
Interconnection Agreement with UNION)	
TELEPHONE COMPANY d/b/a UNION)	DOCKET NO. 04-049-145
CELLULAR under Section 252 of the)	
Federal Telecommunications Act)	

SURREBUTTAL TESTIMONY OF

ANN MARIE CEDERBERG

ON BEHALF OF

QWEST CORPORATION

November 7, 2005

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.**

2 A. My name is Ann Marie Cederberg. I am employed by Qwest Corporation (Qwest) in the
3 Network Policy organization. My business address is 700 W. Mineral Ave Rm. MN
4 G20.23, Littleton, Colorado 80120.

5 **Q. ARE YOU THE SAME ANN MARIE CEDERBERG WHO FILED DIRECT AND**
6 **REBUTTAL TESTIMONY IN THIS PROCEEDING?**

7 A. Yes.

8 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

9 A. The purpose of my testimony is to respond to the Union Cellular rebuttal testimony of
10 Mr. Woody.

11 **Q. DOES MR. WOODY ACCURATELY DEPICT THE NEGOTIATIONS**
12 **BETWEEN QWEST AND UNION IN HIS REBUTTAL TESTIMONY?**

13 A. No. Qwest used a standard template as a starting block for the Interconnection
14 Agreement negotiations. Without a starting point, negotiations can't begin. Mr.
15 Woody's assumption that Qwest is more concerned about other Interconnection
16 Agreements it already has in place is simply incorrect. Qwest has 15 Type 2
17 Interconnection Agreements in the state of Utah and all of those negotiations started with
18 the same template and agreement was reached on all of those negotiations.

19 **Q. DOES MR. WOODY'S REFERENCE TO VERIZON HAVE ANY IMPACT OR**
20 **BEARING ON THE NEGOTIATIONS BETWEEN QWEST AND UNION**
21 **CELLULAR?**

22 **A.** Not in the way Mr. Woody implies. Verizon Wireless actually has separate Type 2
23 Interconnection Agreements with Qwest that govern the transmission of the wireless
24 traffic between the two companies. Mr. Woody ignores the Interconnection Agreements
25 with Verizon Wireless. Mr. Woody also ignores the fact that the negotiations between
26 Qwest and Union concerned interconnection for the purpose of wireless traffic, not
27 wireline traffic.

28 **Q. MR. WOODY'S REBUTTAL TESTIMONY STATES THAT "QWEST WANTS**
29 **TO HAVE UNION'S SWITCH SUBTEND TO THE QWEST TANDEM." IS THIS**
30 **A CORRECT STATEMENT?**

31 **A.** No. Qwest is asking for a Type 2 interconnection to the Union Cellular switch to
32 exchange wireless traffic. Qwest has not asked to have Union's switch subtend Qwest's
33 tandem. Qwest is requesting an industry standard interconnection configuration for the
34 exchange of wireless traffic.

35 **Q. HAS UNION INDICATED BY WHICH MEANS IT WILL PROVIDE THE**
36 **RECORDS TO IDENTIFY AND BILL FOR CALLS WITHOUT THE USE OF**
37 **SEPARATE TRUNKS FOR ITS WIRELESS TRAFFIC?**

38 **A.** No. Although Mr. Woody states in his rebuttal testimony that "Union can identify the
39 calls," it has not identified how it would do this, much less proven it has this capability.

40 **Q. HAS UNION ACCURATELY DEPICTED THE NETWORK CONFIGURATION**
41 **PROPOSED BY QWEST FOR THE TYPE 2 INTERCONNECTION IN ITS**
42 **FIGURE 5E?**

43 **A.** No. This picture does not depict the network configuration Qwest has proposed for the
44 Type 2 interconnection arrangement. Please refer to my diagram, Cederberg Exhibit 1R-
45 1, submitted with my rebuttal testimony which depicts the standard industry arrangement
46 advocated by Qwest. As described in my rebuttal testimony, the costs to Union to
47 designate a separate trunk group for its wireless traffic, over the same facilities used
48 today for its ILEC traffic, would be minimal and not require investment in additional
49 routes or switches as Union's Figure 5E seems to imply.

50 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

51 **A.** Yes.

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59 State of Colorado)
60) ss.
61 County of Denver)
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63 I, Ann Marie Cederberg, being first duly sworn on oath, state that the answers in the foregoing written
64 testimony are true and correct to the best of my knowledge, information and belief. Except as stated in the
65 testimony, the exhibits attached to the testimony were prepared by me or under my direction and supervision, and
66 they are true and correct to the best of my knowledge, information and belief. Any exhibits not prepared by me or
67 under my direction and supervision are true and correct copies of the documents they purport to be.

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69 _____
70 Ann Marie Cederberg

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72 SUBSCRIBED AND SWORN TO this 7th day of November, 2005.

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75 _____
76 Notary Public

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