

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In re: Consideration of :DOCKET NO. 960786-TL
BellSouth Telecommunications, :
Inc.'s entry into interLATA :
services pursuant to Section 271 :
of the Federal Telecommunications :
Act of 1996. :
:

SECOND DAY - AFTERNOON SESSION

VOLUME IX

PAGE 1004 through 1176

PROCEEDINGS: HEARING
BEFORE: CHAIRMAN JULIA L. JOHNSON
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER DIANE K. KIESLING
COMMISSIONER JOE GARCIA
DATE: Wednesday, September 3, 1997
TIME: Commenced at 2:50 p.m.
PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida
REPORTED BY: NANCY S. METZKE, RPR, CCR
APPEARANCES:

(As heretofore noted.)

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FPSC-RECORDS/REPORTING

I N D E X

WITNESSES

1
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4
5
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7
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14
15
16
17
18
19
20
21
22
23
24
25

NAME PAGE NO.

ROBERT C. SCHEYE

Cross Examination By Mr. Canis . . . 1007

GLORIA CALHOUN

Direct Examination By Mr. Ellenberg . . . 1039

Prefiled Direct Testimony Inserted . . . 1042

Prefiled Rebuttal Testimony Inserted. . . 1112

EXHIBITS - VOLUME IX

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NUMBER	ID.	ADMTD.
#40 (Late-filed) CLEC evaluations concerning clarifications, cancellations and duplications . . .	1032	
#41 Exhibits attached to Ms. Calhoun's prefiled direct testimony . . .	1040	
#42 Exhibits attached to Ms. Calhoun's prefiled rebuttal testimony . . .	1158	

P R O C E E D I N G S

(Transcript continues in sequence from Volume)

CHAIRMAN JOHNSON: Okay. And Mr. Scheye, is he in the room? Are we ready to begin?

MR. CANIS: Madam Chairman, Commissioners, Mr. Scheye.

CHAIRMAN JOHNSON: Yes, sir.

MR. CANIS: Again, I'm John Canis for Intermedia. I would like to start out by thanking the Commission, Mr. Scheye and especially Ms. White for accommodating my schedule and by going out of your way to do so. I do appreciate it.

ROBERT C. SCHEYE

Continues his testimony under oath from Volume VI:

CONTINUED CROSS EXAMINATION

BY MR. CANIS:

Q Mr. Scheye, referring, during this line of questioning, to Exhibit Number 22. That exhibit contains two reports that we discussed yesterday, and they are the reports dated March 13th and the reports dated July 8th, and we will spend most of our time discussing the most recently provided report dated August 15th. Do you have copies of those reports?

A The only one I have is the August 15th one. The others one are in my binder if you want me to get them.

1 Q If I may ask you to do so because I will be
2 referring to --

3 A Ms. White will bring them over.

4 Q Thank you.

5 A The July 8th is in there. The entire report is
6 not -- the March one is not in this book, so if I need that
7 one, I will need to get a copy. So I've got two out of
8 three so far.

9 Q You all set?

10 A Yes, sir.

11 Q Mr. Scheye, referring now to the August 15th
12 report.

13 A Yes.

14 Q Do you know, is this the final report in the
15 22-week survey conducted by this consultant?

16 A To the best of my knowledge it is. There is only
17 one item that is not completed. It will be completed in
18 about a week or two, and I don't believe they would
19 necessarily issue a subsequent report for that.

20 Q So you have no expectation at this time that
21 additional reports will be generated by this consultant?

22 A That's correct, sir.

23 Q I take it you have reviewed this report, the
24 August 15th report?

25 A I did look at it briefly, yes.

1 Q And may I ask when you came to receive a copy?

2 A Yesterday.

3 Q Let me just take just about a minute to read a
4 couple of sentences out of the report. On page 3,
5 paragraph 3, under training and development, the report
6 states: "We are developing a new training organization
7 that is responsible for the employees' continual
8 development process."

9 Two sentences down: "However key employees
10 responsible for continuous development will report directly
11 to the heads of LCSC's operation and support."

12 On page 4, under the third category, Phase III,
13 the second bullet point, the third sentence: "A copy of a
14 training manual will be prepared for the LCSC performance
15 manager, Judy Norris."

16 The next bullet point down, last sentence
17 concerning CLEC evaluation reports given to customer
18 support managers, the last sentence states: "They will be
19 responsible for working with the CLEC to correct these
20 issues."

21 Page 5, third paragraph under Phase III, the
22 third bullet point down, that second -- that third
23 paragraph talks about a continual development process. In
24 the middle of that paragraph it states that this item is
25 still in process.

1 A Yes, that's the one I mentioned.

2 Q Thank you. The next bullet point down, second
3 sentence -- I'm sorry, third sentence: "Each team of
4 managers is installing communication boards which include
5 the definition of teams' objectives with respect to quality
6 service and productivity."

7 On page 8, third paragraph down, second bullet
8 point, last sentence in that paragraph: "The additional
9 staffing of 50 service representatives would increase this
10 capacity to about a hundred percent."

11 Under Item 5, the last line on that page:
12 "On-site visits will be hosted by the performance manager,
13 Judy Norris."

14 All of these sentences I just read are in the
15 future tense and indicate to me that there are going to be
16 additional persons hired, additional processes put in place
17 but have not yet been implemented. Do you interpret those
18 sentences the same way that I do?

19 A In part I do, and in part I don't. I think
20 you're correct, certainly the training types of things will
21 be done. Manuals will be produced, you're correct. They
22 were not produced by the consultants as part of the study.
23 BellSouth will undertake that.

24 The one I have a -- the one that you talked
25 about, the additional capacity of employees, it is true

1 that we will be adding 50 service representatives, but the
2 rest of that sentence indicates that we had a capacity of
3 1195 per day orders and that the LCSC would be capable of
4 absorbing 42% additional orders and that of that 17% of the
5 actual orders were what they refer to as hopper orders,
6 which yesterday we discussed were simulated but not real
7 orders. So what this tells me is we are well within the
8 capacity of the orders that we expect to get. The
9 additional staffing will occur, but we have enough capacity
10 right now to handle all the orders we expect plus,
11 obviously, a large margin in addition. So yes, there will
12 be some continuous hiring, but that doesn't mean that there
13 is not adequate people there today.

14 Q Okay. And my only question on that reference to
15 page 8 was BellSouth at this time does plan to employ an
16 additional 50 service representatives that currently are
17 not working for BellSouth?

18 A Yes. That's what it appears to, yes.

19 Q I guess the sum total of these sentences, does
20 this indicate a finished product or a work in progress?

21 A What I would describe it as, this particular
22 effort and this particular audit is completed except for
23 that one item, which was the continuous improvement, and
24 you saw that on the prior page. So this project is
25 effectively completed. The overall implementation process

1 in the LCSC, as well as the operational support systems, is
2 clearly an ongoing process that will go on for years and
3 years and years, as we would expect it to do, and be
4 refined as time goes on, as we would expect. There are
5 specific aspects of this report that will be adopted,
6 additional training as you talked about, as part of that
7 ongoing effort. So clearly the overall operational piece
8 is a work in progress and will be for years. This
9 particular project and the concerns raised in the
10 additional audit, in fact, are complete with the exception
11 of that one item.

12 Q So is it safe to say that as of this date there
13 has been no evaluation of a fully completed, fully staffed,
14 fully trained LCSC with all processes in place and manuals
15 completed and personnel trained?

16 A That day will probably never come. They will
17 continue to be evolved for the next, I would guess -- if
18 access charges are a good example for us, they are still
19 evolving, and we put those processes in place in 1984, so I
20 would expect 15 years from now those processes will
21 continue to evolve, become refined and change, so I'm not
22 sure we will ever hit that date or the description that
23 you, of the scenario you laid out.

24 Q But is it the case that this 22-week program was
25 intended to put in place processes, establish manuals and

1 work order -- work flow processes?

2 A No, that wasn't the purpose of the study. The
3 study was not to create the manuals. The study was to
4 determine how to fix certain things that the consultants
5 found in their initial 10-day review. What the study
6 indicates, some, in fact, things have been implemented; and
7 as this report gives you and shows you, there has been
8 dramatic improvement in almost every area, if not every
9 area that they had concerns about. They also indicated
10 that there should be some continuous improvement, there
11 should be some continuing training that goes on on an
12 ongoing basis, and that's what is being referred to in the
13 future tense that you referred to.

14 Q Is it safe to say that all of the processes
15 contemplated in this report have not yet been implemented?

16 A No, all the processes contemplated by this
17 particular report have been implemented by the consultants,
18 that was their job, that was their purpose. As I said,
19 certain things, like additional training manuals, will
20 always be ongoing, and that is what is being referenced
21 here as well; but the consultants will not be doing that,
22 and that was not the concern they raised in the audit or
23 their study.

24 Q I'd like to refer you to page 8.

25 A Yes.

1 Q Now we talk about hopper orders, and you
2 mentioned them previously. We discussed these a little bit
3 briefly yesterday. Just to make sure that we are on the
4 same track, when I refer to hopper orders, I refer to
5 simulated local service requests that are submitted and
6 that are distinct from actual orders submitted by CLECs.
7 Do you agree with that definition?

8 A Yes. Yes, sir.

9 Q Now I believe yesterday, it's my recollection
10 that I asked you if you knew what the mix of hopper orders
11 with real CLEC orders was in the reports generated as part
12 of this 22-week study. It is also my recollection at that
13 time that you testified that you did not know. Is that a
14 fair recollection?

15 A Yes.

16 Q Is there information in this August 15th report
17 that provides different information than we had yesterday?

18 A Yes. The August 15th report on page 8 indicates
19 that of the 1195 orders for the first two weeks of August,
20 17% were hopper orders, and I believe -- I looked back at
21 the July report after you discussed that, and I believe for
22 the period of time there it was 10; so in both reports
23 there was additional information.

24 Q Now in the discussion under Phase II, at the top
25 of page 8, they talk about a percentage of hopper orders

1 during the June average, which is 10%, and the next
2 paragraph --

3 A Yes.

4 Q Do you see where I am?

5 A Yes. Phase II, correct. I think that was the
6 10% that we saw in the earlier, in the July report.

7 Q Okay. But it was the average for June; is that
8 the case?

9 A Yes, you're correct, sir.

10 Q Now in the next paragraph on Phase III, there is
11 a discussion of a measure for the first two weeks of
12 August, and that discusses 17% volume of hopper orders; is
13 that correct?

14 A Yes, correct.

15 Q Do you know why the volume of hopper orders
16 increased by 7% from June to the first half of August?

17 A I could only speculate with you that, as these
18 reports indicate, the hopper orders are done to make sure
19 that the service representatives are trained on a full
20 array of types of orders that may come in. It is likely
21 that what occurred in August is they weren't getting an
22 adequate mix based on the training they were attempting to
23 do to adequately train all of the service reps on all of
24 the types of orders so they needed to generate additional
25 types of orders that happened to represent a higher

1 percentage in order to accomplish their training.

2 Q Is the use of hopper orders done exclusively for
3 training purposes?

4 A Yes, that's what the study indicates, that as
5 part of the training and part of the processing, in order
6 to determine flows and quantities and to make sure the
7 service representatives can handle them, that's what the
8 purpose of the hopper process was, or is.

9 Q Are hopper orders used to determine the total
10 capacity of the LCSC?

11 A No, the capacity is -- I mean they will be
12 included in the volumes, but I think if we look at, under
13 Phase III on page 8, we show a capacity of 1625 per day
14 orders; and then I think we show on the next one that there
15 were 1195 actual orders processed of which 17% were hopper
16 orders; but it looks like the actual capacity was the
17 1625. Now as the next sentence goes, it says, "The LCSC,
18 therefore, would have been capable of absorbing a 42%
19 additional orders," which I think -- I didn't do the math,
20 but I suspect if you add 42% to the 1195 you'll get into
21 the ballpark of the 1625; so the capacity is a stand-alone
22 calculation.

23 Q Are hopper orders used in any of the studies used
24 to determine the quality of service provided by the LCSC?

25 A In the sense that it's used to train the service

1 representatives as to how to operate, and I'd say you could
2 certainly construe that as quality, yes.

3 Q One of the quality reports that we discussed
4 yesterday was the number of clarifications; that is, the
5 percentage of orders that are rejected and returned to a
6 carrier because they contain incomplete or inaccurate
7 information. Do you know whether hopper orders are used in
8 any of the tasks that measure the number of clarifications?

9 A I would have to assume, sir, that they are not
10 because, again, those numbers were to represent orders
11 processed from a carrier where the carrier had made some
12 sort of error and information had to flow back. Since a
13 hopper order doesn't involve a real carrier, I can't
14 imagine that it would come through incorrectly.

15 Q When looking at the percentages of clarifications
16 that are reported, are those only percentages per CLEC, or
17 are they percentages of entire orders processed by the
18 LCSC?

19 A I can't tell from the mathematics, sir. I'm just
20 giving you -- I'm speculating with you that the numbers
21 were done on only live orders, CLEC orders, but I didn't
22 work the mathematics, nor have I talked to the people who
23 did to be able to tell you with certainty.

24 Q Okay. And that is speculation on your part?

25 A Yes, sir, it is.

1 Q If 17% test orders that contain no errors were
2 included in a sample that was to generate a service quality
3 report, could it skew the outcome of that report favorably?

4 A It could. Assuming, again, there were no errors
5 in it, and I would hope there wouldn't be, that's a
6 possibility. I think we also found in this report that in
7 Phase III we were implementing a process. We saw that the
8 number of clarifications were reduced over time from the
9 beginning to the current time and that they were
10 implementing a process to get more direct one on one with
11 the individual carriers to fix those particular
12 clarifications, to reduce that number.

13 Q And we don't know at this time whether hopper
14 orders, artificial orders, were included in the measure to
15 determine the amount of clarifications?

16 A No, we don't. As I said, I can speculate with
17 you that they were not, but I cannot tell you with
18 certainty since I did not do the actual mathematics.

19 Q During the course of this 22-week study, have any
20 service quality reports been conducted that did not include
21 artificial work orders?

22 A I'm sorry, could you repeat the question?

23 Q During the 22-week course of this study, have any
24 service quality studies been conducted that did not include
25 artificial work orders or hopper orders?

1 A Well, I think we just speculated that the
2 clarification, the percentages of clarifications, or the
3 volume of clarification orders back to CLECs probably did
4 not include hopper orders. Again, I told you, I didn't
5 know with certainty since I didn't do it, but I would have
6 to assume it did not; so therefore, the answer to the
7 question is, yes, there were some that to the best that I
8 can give you a speculative answer on did not include hopper
9 orders. I didn't do the math, I'm sorry.

10 Q So is the real answer to my question then you
11 don't know whether there were any tests completed in this
12 22-week study that excluded all hopper orders?

13 A I can only give you my opinion. You're right,
14 sir, I didn't do it, so I can't give you any answer with
15 certainty on that.

16 Q Thank you. I'd like to refer you to page 5 of
17 the August 15 report.

18 A Yes, I have it.

19 Q Second paragraph -- I guess third paragraph down
20 on Phase III, second bullet point talks about adjustment of
21 follow up, "A work simulation of basic single line resale,
22 (disconnect, new connect, switch "as is" and switch with
23 changes) was administered to all LCSC personnel. The
24 hopper was utilized to perform this work simulation.
25 Service representatives that performed below expectation of

1 error free processing received additional training and/or
2 coaching."

3 Were the elements of disconnect, new connect,
4 switch "as is" and switch with changes, were those issues
5 that were studied in other reports generated during this
6 22-week study?

7 A I'm sorry, were they -- Just repeat it, if you
8 don't mind.

9 Q Sure. The terms here, measuring specific
10 functions, disconnect, new connect, switch "as is" and
11 switch with changes, were these functions studied in any
12 other report generated during this 22-week period?

13 A Certainly. These are the generic type of resale
14 orders you would have, so to the extent a resale order was
15 studied, which certainly they were part of the process,
16 these types of orders would have been included. They just
17 for some reason spelled out more specifically here the
18 various types of resale orders that might occur.

19 Q All right. So the specific functionalities of
20 switch "as is" and switch with changes were, in fact, in
21 the testing methodology and were being reviewed and studied
22 prior to the time this report was generated?

23 A I would, again, have to assume that was part of
24 the process, sure.

25 Q Now I'm sorry, Mr. Scheye, is this an assumption

1 on your part?

2 A Yes.

3 Q Or do you know?

4 A I do not know. I did not conduct this study. I
5 wasn't part of this study. You and I are reading along the
6 same information, so we have the same information. You saw
7 the original report just like I did, but resale was
8 certainly part of it, so these kinds of orders would be
9 part of it.

10 Q Now the test referred to in this second bullet
11 point, this test was conducted using entirely simulated
12 service orders; is that correct?

13 A That's what it says, yes, sir.

14 Q And it does not indicate that any such study was
15 conducted using actual service orders submitted by CLECs;
16 is that correct?

17 A That's what it says, correct.

18 Q Now this bullet point also talks about a work
19 simulation of basic single line resale. To your knowledge,
20 has any test been conducted on LCSC's performance in regard
21 to unbundled network elements?

22 A It doesn't say right here. I'm sure they -- part
23 of the process had to do with unbundled network elements.
24 They are just spelling out a particular piece right here,
25 so some of the orders they processed were certainly for

1 unbundled network elements. Some of them may have been
2 simulated orders; some of them were likely to be live
3 orders.

4 Q Mr. Scheye, I'm going to have to ask you to be a
5 little more specific in terms of what you are assuming and
6 what you actually know.

7 A As I said, I didn't do the study. I didn't do
8 the report. The study was not done on my behalf. I can
9 only give you the same information you are reading from,
10 and I don't claim to have had the study done on my behalf,
11 so I don't have all the details.

12 Q Well, may I ask you then, are you aware of any
13 studies conducted on the LCSC's handling of unbundled
14 network elements?

15 A Not specifically I'm not, no.

16 Q Are you aware of any studies conducted on the
17 LCSC's handling, using any task, using real or simulated
18 data, concerning the LCSC's handling of data services,
19 including HDSL, ADSL, DS-1, ISDN or 56- or 64-kilobit
20 unbundled loops?

21 A Not with that level of specificity, no.

22 Q Are you aware of any tasks conducted on the
23 LCSC's handling using real or simulated data of data
24 circuits of any sort?

25 A Of data services? Again, not with that level of

1 specificity, no.

2 Q I would like to direct your attention now to page
3 9 in the second paragraph regarding Phase II, second bullet
4 point, "Created a modular training agenda for single line
5 resale (DOE) that will reduce training time from six weeks
6 to two weeks. For a few who do not pass the work
7 simulation, there will be follow-up instruction for three
8 days."

9 Do you know why BellSouth reduced its training
10 time from 42 days to a period of 14 to 17 days?

11 A They probably got more efficient in how to train
12 the service representatives on this particular item and
13 could do it in a shorter period of time.

14 Q Now you said they probably. Does that mean you
15 are speculating as to the reason why the training time was
16 reduced from 42 days to 14 to 17 days?

17 A Absolutely. As I said, this study was not done
18 on my behalf or for me, so I can only give you my best
19 interpretation of what this says.

20 Q Again on page 9, third paragraph, first bullet
21 point, "Developed and delivered LENS training to 14
22 part-time temps in Atlanta."

23 Do you know why Bell Atlantic is using part-time
24 temporaries in Atlanta?

25 A I don't work for Bell Atlantic, so I can't speak

1 to that.

2 Q I'm sorry, BellSouth.

3 A Why are they using temps in Atlanta?

4 Q Yes.

5 A Again, this is a very volatile work environment,
6 and getting it sized correctly is difficult, so they are
7 supplementing full-time people with part-time people, just
8 a work flow -- until the work flow gets more predictable.

9 Q Okay. I believe on the previous page, page 8,
10 they were talking about additional staffing of 50 service
11 representatives and that we talked about BellSouth's
12 intention to hire an additional 50 personnel. Do you know
13 why they would be using temporary, part-time personnel
14 where there is an intention to hire 50?

15 A Yes, because as it says, it gives no indication
16 as to when they might hire the 50. What the sentence says
17 is, if you were to hire 50 people, you would essentially
18 double the capacity from roughly 1625 to whatever that
19 would be, 3250. Presumably they are not going to hire
20 those people until there is a need to have capacity in the
21 three thousand range. That could be tomorrow. That could
22 be probably six months from now; that could be a year from
23 now.

24 Q Also under Page 3, the second bullet point.

25 A Page 3, I'm sorry?

1 Q I'm sorry, paragraph 3 on page 9.

2 A Oh, okay. Under Phase III?

3 Q Yes.

4 A Yes, okay.

5 Q Second bullet point, there is a -- well, actually
6 the first bullet point talks about developed and delivered
7 LENS training. The second bullet point talks about
8 developed training modules for resale using the SONGS data
9 base. Have LENS or SONGS data bases, or ordering -- I'm
10 sorry, ordering systems, been cited in the previous reports
11 generated during this 22-week survey?

12 A Have these specific systems been discussed?

13 Q Yeah.

14 A They were discussed, certainly, in one form or
15 another, whether the term LENS or the term SONGS or DOE
16 were included, I would have to go back and look
17 specifically. But certainly the systems are not new;
18 therefore, they have been in there and in effect for the
19 22-week period, so they certainly have been referenced in
20 one form or another in the prior reports.

21 Q Are you aware of any -- well, I'm sorry, let me
22 rephrase that question. This August 15th report is a Phase
23 III report; is that true?

24 A Yes, it's the final, correct, final phase.

25 Q Now in the Phase III paragraph, the third

1 paragraph we just discussed on page 9, the second bullet
2 point talks about develop training modules for single line
3 SONGS.

4 A Yes.

5 Q Do you have any indication that training was done
6 on SONGS prior to Phase III?

7 A Certainly there was training done on single line
8 and multi-line resale. This is a new module. It doesn't
9 imply that there was no training done before.

10 Q I'm talking about specifically using the SONGS
11 ordering system.

12 A I don't know the specificity of how the training
13 may have occurred prior to this.

14 Q So do you know whether this project has resulted
15 in studies on LCSC personnel proficiency in the use of LENS
16 and SONGS ordering systems?

17 A Has it increased their proficiency?

18 Q No, I'm sorry, are you aware of any studies
19 conducted during this 22-week survey that specifically
20 resulted in data talking about the LCSC's personnel's
21 proficiency in the use of LENS and SONGS ordering systems?

22 A I think all the statistics we see here would
23 indicate increased proficiency of systems, including those
24 systems. I mean that's what this whole study was about, to
25 try to increase the efficiency, get the service

1 representatives better trained; and I think all the
2 indicators, if you go through Phase III, you see
3 productivity increases in each and every aspect, so you'd
4 have to say the proficiency obviously increased
5 significantly during the 22-week period.

6 Q Are there any other ways for me to order a
7 service that is processed through the LCSC without going
8 through LENS and SONGS?

9 A Yes.

10 Q So is it possible that the studies conducted
11 during this process, in fact, looked at those other
12 procedures and did not specifically look at LENS or SONGS
13 based ordering processes?

14 A Anything is possible. Since these systems are
15 mentioned, there is training going on, you would have to
16 assume and believe that the statistics are done on the
17 totality of orders, not the ones through one system or
18 another system. So they were looking at the totality and
19 not one -- orders just generated by one systems. Obviously
20 you get a very biased answer, good or bad, if you did that,
21 or could get a very biased answer.

22 Q So the Phase III paragraph, talking about
23 developing a training module for SONGS, does that give you
24 any indication that, in fact, a study had been conducted to
25 show how well LCSC personnel actually did in processing

1 orders through the SONGS data base, or rather ordering
2 system?

3 A Again, you are going to ask me to speculate.

4 Q I'm sorry, I'm not asking you to speculate. I'm
5 asking you if you know.

6 A I don't know with specificity. All we can go by
7 is the report that started in March. It indicated areas of
8 improvement. These were the activities that were agreed to
9 and they were done.

10 Q Yesterday when we were discussing the July 8th
11 report, and I'm referring now to information contained on
12 page 2 of that July 8th report, we talked about
13 clarifications. And again, just to make sure that we are
14 both talking about the same thing, clarifications, as I'm
15 using the term, mean orders submitted by a CLEC that are
16 rejected and submitted back to the CLEC for later
17 submission due to errors or incorrect or absent
18 information. Is that your understanding of that term?

19 A Yes, sir, that's the definition we had, you're
20 correct.

21 Q Now in paragraph C, on page 2 of the July 8th
22 report, we talked about a number showing that the
23 percentage of AT&T and MCI LSRs needing clarification for
24 the week June 25th was 64.6%; do you recall that
25 conversation?

1 A Yes, I have it.

2 Q That information also says that the average
3 number of times these LSRs were sent back to order to
4 complete the processing was 1.7 times?

5 A Correct.

6 Q Does the August 15th report address this
7 measurement?

8 A I don't see those numbers. I do see on page 4
9 under Phase III, the third bullet it says, "The CLEC
10 evaluation was developed that tracks the percentage of
11 clarifications, cancellations and duplications received
12 from each CLEC. This data is pulled," et cetera. And then
13 the final sentence, "They will be responsible for working
14 with the CLEC to correct these issues." I don't know if
15 there is a statistic that gives you the change in volume on
16 that though.

17 Q So would you agree with me that on the basis of
18 the reports produced by BellSouth, the most current
19 information remains that almost 65% of orders submitted by
20 AT&T and MCI are subject to clarification?

21 A I could not conclude that as you said, and I
22 can't find a statistic in here. The fact that all other
23 measurements improved, I don't think one can conclude that
24 that number did not improve or that it went up or down
25 based on this.

1 Q Well, let -- I'm sorry, have you completed?

2 A I thought there may have been something in here.
3 I'm just looking through the report.

4 Q Please take your time to review that.

5 (Witness reviewed document)

6 A I don't see it offhand.

7 Q Would you agree with me then that there is no
8 data included in any of the reports generated by BellSouth
9 indicating that that 64.6% clarification number has been
10 reduced or that the 1.7 mean resubmissions of clarification
11 orders has been improved?

12 A I didn't see it --

13 MS. WHITE: Well, I would object only from the
14 standpoint that it's not a report produced -- I mean,
15 excuse me, it's not a report generated by BellSouth. It's
16 a report generated by an outside consultant for BellSouth.

17 MR. CANIS: And I will be happy to rephrase my
18 question. I'm sorry, I meant the report produced by
19 BellSouth in this proceeding.

20 BY MR. CANIS:

21 Q Would you like me to rephrase that question,
22 Mr. Scheye, or do you recall?

23 A I recall it. I would agree with you that there
24 is nothing in the Phase III report, the August 15 that
25 reflects a change up or down of the 64.6% per se. That

1 number -- that statistic is not in there.

2 Q Now yesterday I asked you why that 64.6%
3 clarification statistic only measured reports submitted by
4 AT&T and MCI, and it is my recollection that your response
5 at that time was that you didn't know. Is that a fair
6 recollection?

7 A Yes, I think I speculated with you, but I didn't
8 have a factual basis.

9 Q Is there any information in the new August 15th
10 report that indicates that -- that changes your answer to
11 that question?

12 A No.

13 Q Let me refer you to page 4.

14 A Okay.

15 Q Of paragraph 3, bullet point 3, and I believe it
16 was the bullet point you just referred to a little while
17 ago.

18 A Yes.

19 Q That bullet point reads: "A CLEC evaluation was
20 developed that tracks the percentage of clarifications,
21 cancellations and duplications received from each CLEC.
22 This data is pulled weekly from the LON order tracking
23 system and presented to the customer support managers."

24 Does this indicate to you that CLEC specific
25 clarification data are generated?

1 A Yes, that's what it says.

2 Q Do you know if this information is available?

3 A Available to the CLEC?

4 Q I'm sorry, available to BellSouth. Can we put
5 our hands on it if we needed to?

6 A Since this report says this data is pulled weekly
7 and presented to the customer support managers, I would
8 assume the customer support managers have it.

9 MR. CANIS: Madam Chairman, may I at this time
10 make a request for a late-filed exhibit for any information
11 that BellSouth has from studies that were generated that
12 show the information referenced in that bullet point?

13 CHAIRMAN JOHNSON: It will be identified as
14 Exhibit 40, and give me a short title for that.

15 MR. CANIS: Oh, yes, how about CLEC performance
16 -- CLEC specific performance data.

17 MS. WHITE: That seems kinds of broad.

18 WITNESS SCHEYE: That is a lot broader than that
19 what this sentence says.

20 MS. WHITE: It's talking about a CLEC evaluation
21 that tracks the percentage of clarifications, cancellations
22 and duplications received from each CLEC.

23 MR. CANIS: And I will be delighted to defer to
24 Ms. White for a preferred short title for this report.

25 MS. WHITE: All right. How about CLEC

1 evaluations concerning clarifications, cancellations and
2 duplications. I would also hope that we could put a date
3 on this, I mean from what time to what time.

4 MR. CANIS: I agree. It's somewhat ambiguous, so
5 I really have no expectation or no basis to expect what
6 might be available or how we may delineate it.

7 MS. WHITE: Okay. It was talking about a CLEC
8 evaluation that was developed. It's talking about it in
9 regard to this August 15th report, so we will see when the
10 first one was and up to date, most recent date.

11 CHAIRMAN JOHNSON: That sounds reasonable. We'll
12 identify that as Late-filed 40.

13 BY MR. CANIS:

14 Q Mr. Scheye, I am going to do a side-by-side
15 comparison of some language in the August 15th report and
16 the July 8th report, so I would ask you to turn to page 2
17 respectively of each of those reports.

18 A Okay, page 2 of July 8th and page 2 of August
19 15th?

20 Q Yes.

21 A I can do that.

22 Q Now we are talking about language that refers to
23 the number of clarifications experienced in the LCSC. I
24 would draw your attention first to the July 8th report,
25 Paragraph C.

1 A Yes.

2 Q Four lines up from the bottom, the sentence
3 starts in the middle of the line, and I'll read that
4 sentence. Well, actually let me back up and read it
5 from -- the first two sentences talk about the 64.6%
6 clarification rate. The next sentence talks about the
7 average number of times reports had to be reissued was
8 1.7. Then the next sentence states: "This high level of
9 clarifications suggests improvement is required in the
10 CLEC's preparation of the LSR," local service request,
11 period.

12 I would now like to address your attention to
13 paragraph C on page 2 of the August 15th report addressing
14 the same issue, second sentence, third line down. That
15 sentence, those two sentences read -- well, the first
16 sentence talks about performance and what was done during
17 the study. The second sentence starts, "Also, to continue
18 to make progress in alleviating fundamental barriers that
19 are not in BellSouth's control. The fundamental barriers
20 are the lack of predictability in work volume input and the
21 lack of completeness (quality) and the orders received from
22 the CLECs."

23 Looking at the two sentences or two sections that
24 I just read, Mr. Scheye, do you detect a change in tone or
25 emphasis?

1 A Do I detect a change from one report to the
2 other?

3 Q Yes.

4 A Not really. I think in both cases what they are
5 trying to suggest or what they are indicating is that we
6 are receiving orders that lack the quality that allow us to
7 complete the orders and that because of that situation we
8 cannot be as efficient as we would like to be and that we
9 need to put in place a process to try to reduce those
10 number of incorrect orders and to increase the quality of
11 orders, but I don't -- I mean the wording is a little
12 different, but I don't see a change in tone, by the author,
13 if that's what you're asking.

14 Q Has the term from the August 15th report,
15 "fundamental barriers," been referenced -- do you recall
16 seeing that in any previous report?

17 A No, it may have been a different author. I'm
18 sure there was more than one person working from the
19 consulting firm and somebody may have used different
20 terminology.

21 CHAIRMAN JOHNSON: Mr. Canis, how much more do
22 you have?

23 MR. CANIS: About two questions.

24 CHAIRMAN JOHNSON: Okay.

25 BY MR. CANIS:

1 Q Do you have any idea what fundamental barriers
2 refers to?

3 A Yes, I think what it is referring to is our
4 ability -- the LCSC's ability to provide high quality
5 service to all the CLECs. And what this is saying to us is
6 they are receiving what they believe is a very high
7 percentage of orders that are incorrect, that require
8 clarification, and as you indicated in the earlier report,
9 almost two times each order has to go back to certain CLECs
10 to get it corrected before we can process it. Because of
11 that, we are not able to provide the highest quality of
12 service because we are spending a huge amount of time
13 getting those orders corrected, and I think what the
14 consultants are suggesting is we need to try to work with
15 those CLECs to try to reduce that number dramatically, not
16 only to increase the quality of service to them but to
17 increase the quality of service to all other CLECs.

18 Q Had there been any other reference in any other
19 report generated to this -- in this process about reporting
20 items that are not in BellSouth's control?

21 A Yes, the prior report, that's what the
22 clarifications are talking about. They are not within our
23 control in the sense that the order is produced by the CLEC
24 and provided to us. The error, therefore, is not generated
25 by us but by the CLEC. I think that is the reference of

1 out of our control.

2 Q Was the term "out of BellSouth's control" used
3 previously to your knowledge?

4 A The terminology, I don't know. I mean I didn't
5 read these for particular words.

6 Q And then to your knowledge, has BellSouth had any
7 input into the language or phrasing of any of these
8 reports?

9 A I haven't. I doubt they have. The consultants
10 write these reports.

11 Q Again, that is speculation on your part?

12 A Certainly. I didn't give them the instructions,
13 haven't talked to them.

14 MR. CANIS: Thank you. I have no further
15 questions.

16 CHAIRMAN JOHNSON: Okay. We are going to recess
17 for -- You said it takes about 30 minutes?

18 MS. WHITE: Yes. Did no one else have any
19 questions? I thought Mr. Melson had --

20 CHAIRMAN JOHNSON: I think he does, but it
21 doesn't matter. We are going to take a break.

22 MS. WHITE: I can live with that.

23 WITNESS SCHEYE: Does that mean he doesn't get to
24 ask them?

25 CHAIRMAN JOHNSON: Well, he'll ask them on

1 Friday. We really want to try to get through the
2 presentation.

3 MS. WHITE: Okay. So we will need approximately
4 30 minutes for her to set up, so if maybe we can come back
5 at 4:15 or 10 after four?

6 COMMISSIONER CLARK: How long is the
7 presentation?

8 MS. WHITE: How long is the presentation? It's
9 my understanding it's approximately an hour.

10 CHAIRMAN JOHNSON: Yeah, we are going to need to
11 reconvene at four.

12 MS. WHITE: Okay. We'll do the best we can.

13 CHAIRMAN JOHNSON: We'll take a break until
14 four.

15 (Brief Recess)

16 CHAIRMAN JOHNSON: We're going to go back on the
17 record. BellSouth.

18 MR. ELLENBERG: Thank you, Chairman Johnson,
19 Commissioners. I'll William Ellenberg, BST. I will be
20 conducting the direct examination of Ms. Gloria Calhoun who
21 we call at this time.

22 CHAIRMAN JOHNSON: Ms. Calhoun, were you sworn?

23 WITNESS CALHOUN: Yes.

24 CHAIRMAN JOHNSON: Okay.
25

1 Whereupon,

2 GLORIA CALHOUN

3 was called as a witness on behalf of BellSouth and, having
4 been duly sworn, testified as follows:

5 DIRECT EXAMINATION

6 BY MR. ELLENBERG:

7 Q Ms. Calhoun, state your name.

8 A Gloria Calhoun.

9 Q And what is your business address?

10 A 675 West Peachtree Street Northeast, Atlanta
11 Georgia.

12 Q And by whom are you employed at that address?

13 A By BellSouth Telecommunications, Inc.

14 Q What is your position with BellSouth
15 Telecommunications?

16 A Director of regulatory planning.

17 Q Ms. Calhoun, did you cause to be prepared and
18 filed in this proceeding direct testimony of 70 pages in
19 question and answer form?

20 A Yes.

21 Q Do you have any changes, additions or corrections
22 to your prefiled direct testimony?

23 A No.

24 Q If I were to ask you the questions that appear in
25 your prefiled direct testimony this afternoon, would your

1 answers be the same?

2 A Yes.

3 Q Are those answers true and correct?

4 A Yes.

5 MR. ELLENBERG: Chairman Johnson, I move that the
6 direct prefiled testimony of Ms. Calhoun be incorporated
7 into the record as if read orally.

8 CHAIRMAN JOHNSON: It will be so inserted.

9 Q Ms. Calhoun, were there attached to your prefiled
10 direct testimony 27 exhibits?

11 A Yes.

12 MR. ELLENBERG: Chairman Johnson, I ask that the
13 27 exhibits attached to the prefiled direct testimony be
14 marked for identification, I believe as a Composite Exhibit
15 Number 41.

16 CHAIRMAN JOHNSON: It will be marked as Composite
17 Exhibit 41.

18 Q Ms. Calhoun, did you cause to be prepared and
19 filed rebuttal testimony consisting of 46 pages in question
20 and answer form?

21 A Yes.

22 Q Do you have any changes, additions or corrections
23 to your prefiled rebuttal testimony?

24 A I do. I have two. The first is at page 14, line
25 21. Please strike the word "rebuttal" and insert, to

1 finish that sentence, "Exhibit GC-1 filed with my direct
2 testimony."

3 Q And your second correction?

4 A My second correction is page 15, line 17, after
5 the first two words of that line, replace the period with a
6 comma.

7 COMMISSIONER GARCIA: What page?

8 A Page 15, line 17, replace the period after
9 "complete" with a comma, insert the word "and." And then
10 insert a period after the word "this" and capitalize the
11 word "on."

12 Q Are those all the changes and corrections to your
13 rebuttal testimony?

14 A Yes.

15 Q With those corrections, if I were to ask you the
16 questions that appear in your prefiled rebuttal testimony
17 this afternoon, would those answers be the same?

18 A Yes.

19 Q Are those answers true and correct?

20 A Yes.

21 MR. ELLENBERG: Chairman Johnson, again I'd move
22 that the prefiled rebuttal testimony of Ms. Calhoun be
23 incorporated into the record as if read orally.

24 CHAIRMAN JOHNSON: It will be so incorporated.
25

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF GLORIA CALHOUN
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 960786-TL
5 JULY 7, 1997
6

7 Q. Please state your name, address and position with BellSouth
8 Telecommunications, Inc. ("BellSouth").
9

10 A. My name is Gloria Calhoun. My business address is 675 West
11 Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth
12 Telecommunications, Inc. as a Director of Regulatory Planning. In that
13 position I handle matters related to operations planning and
14 implementation for local interconnection, unbundling and resale.
15

16 Q. Please summarize your background and experience.
17

18 A. I graduated *summa cum laude* with a Bachelor of Arts degree in
19 Economics from the University of North Florida. In 1995, I completed a
20 management studies program at the Georgia Tech Management
21 Institute. I began my BellSouth career in 1981 when I joined the
22 Southern Bell Business Marketing organization in Jacksonville, Florida.
23 In that capacity I was responsible for coordinating the interdepartmental
24 efforts needed to implement complex voice systems and associated
25 exchange services. I joined the economic analysis group at company

1 headquarters in Atlanta in 1985, where I analyzed operations costs for
2 dedicated services. I subsequently held positions in which I had pricing
3 and planning responsibilities for dedicated services, as well as for
4 additional testing, maintenance and other special provisioning activities
5 for access customers. I have been directly involved in operations
6 planning and implementation for local interconnection, unbundling and
7 resale since March, 1995, and was the primary interface for
8 negotiations with AT&T on operational issues between September
9 1995 and March 1996. Most recently I have testified on behalf of
10 BellSouth on electronic interfaces and other operational issues in cases
11 related to BellSouth's entry into the long distance market in Georgia
12 and Louisiana, and in arbitration hearings in Alabama, Florida, Georgia,
13 Kentucky, Louisiana, North Carolina, and Tennessee.

14

15 Q. What is the purpose of your testimony?

16

17 A. The purpose of my testimony is to describe how BellSouth provides
18 non-discriminatory access to its operational support systems as
19 required by the Telecommunications Act of 1996 ("the Act"), the
20 Federal Communications Commission's ("FCC's") orders, and previous
21 orders of the Florida Public Service Commission ("FPSC" or "this
22 Commission"). I provide the details of BellSouth's implementation for
23 each electronic interface, including testing, capacity, documentation
24 and training, and show that each interface is generally available or in
25 commercial use.

1

2 Q. How is your testimony organized?

3

4 A. I begin my testimony by addressing the meaning of non-discriminatory
5 access in the context of operational support systems. I then address
6 the electronic interfaces available for each required function. Those
7 functions are pre-ordering, ordering and provisioning, maintenance and
8 repair, and billing; I address each of these in turn. Specifically, I
9 compare BellSouth's retail access for each function to the access
10 currently available to and in use by alternative local exchange carriers
11 (ALECs). I also describe the capacity of each interface to support
12 ALEC transactions, as well as the training, documentation and other
13 support available to ALECs using the interfaces.

14

15 **Evaluating Non-Discriminatory Access**

16

17 Q. Did the FCC define non-discriminatory access to operational support
18 systems?

19

20 A. Yes. The FCC's August 8, 1996 Order in Docket No. 96-98 ("FCC
21 Order"), at paragraph 312, indicates generally that the quality of access
22 to unbundled network elements must be comparable among ALECs,
23 and between ALECs and BellSouth. In specifically addressing the
24 interfaces that are the subject of this testimony, paragraph 518 of the
25 FCC Order states that "if competing carriers are unable to perform the

1 functions of pre-ordering, ordering, provisioning, maintenance and
2 repair, and billing for network elements and resale services in
3 **substantially the same time and manner** that an incumbent can for
4 itself, competing carriers will be severely disadvantaged, if not
5 precluded altogether, from fairly competing. Thus providing non-
6 discriminatory access to these support system functions, which would
7 include access to the information such systems contain, is vital to
8 creating opportunities for meaningful competition.” (emphasis added)

9

10 Q. Does this mean that the functionality provided to ALECs must be
11 identical in every respect to the functionality available through
12 BellSouth’s retail systems?

13

14 A. No. Paragraph 315 of the FCC’s Order describes the incumbents’
15 obligations as being to provide unbundled elements, such as access to
16 operational support systems, “under terms and conditions that would
17 provide an efficient competitor with a meaningful opportunity to
18 compete.”

19

20 Q. How should this Commission evaluate whether BellSouth’s electronic
21 interfaces provide non-discriminatory access to BellSouth’s operational
22 support systems?

23

24 A. This Commission should apply the principle articulated by the FCC.
25 Thus, if all ALECs are provided access to the information and

1 functions in BellSouth's operational support systems in **substantially**
2 **the same time and manner** as BellSouth has access when serving its
3 retail customers, then this Commission should find that such access is
4 non-discriminatory.

5

6 Q. The United States Department of Justice (DOJ) has provided
7 comments on operational interfaces in connection with the recent
8 application for interLATA authority filed with the FCC by SBC
9 Communications, Inc. Does BellSouth agree that the DOJ's role
10 includes evaluating operational support systems?

11

12 A. No. To my knowledge, the DOJ has no particular expertise in systems
13 issues. As discussed by Mr. Varner, BellSouth's position is that the
14 DOJ's role in consulting with the FCC is limited to antitrust issues.
15 Thus, the DOJ's opinions concerning operational support systems are
16 neither binding nor persuasive, and this Commission should evaluate
17 BellSouth's operational support systems based on the record in this
18 proceeding.

19

20 Industry Standards and Non-Discriminatory Access

21

22 Q. Did the FCC establish conformance with industry standards as a
23 requirement for non-discriminatory access to operational support
24 systems?

25

1 A. No. In fact, in paragraph 13 of the FCC's Second Order on
2 Reconsideration in CC Docket No. 96-98, dated December 13, 1996,
3 the FCC stated "[i]t is apparent . . . that access to OSS functions can
4 be provided without national standards. We therefore reject the
5 petitions of LECC and Sprint to delay the requirement to provide non-
6 discriminatory access until national standards have been fully
7 developed. We conclude that such a requirement would significantly
8 and needlessly delay competitive entry." The FCC concluded, "[w]e
9 continue to encourage parties to develop national standards for access
10 to OSS functions, but decline to condition the requirement to provide
11 access to OSS functions upon the creation of such standards."
12 Implicitly, non-discriminatory access can be provided through interfaces
13 that are not nationally standardized.

14

15 Q. Does BellSouth nonetheless support developing interfaces that
16 conform with industry standards?

17

18 A. Yes. BellSouth is in fact a strong supporter of industry standards, and
19 is a regular participant in the industry bodies developing standards.
20 Also, as required by this Commission's arbitration orders, BellSouth
21 has developed its interfaces on the basis of industry standards, where
22 they exist. For example, Electronic Data Interchange (EDI), an
23 ordering interface, was adopted by the industry for ALEC local service
24 requests, and BellSouth offers ALECs an EDI ordering interface.
25 BellSouth's interface for daily billable usage is provided in the BellCore-

1 supported, industry-standard Exchange Message Record (EMR)
2 format. BellSouth offers ALECs use of the same industry-standard
3 trouble reporting interface currently used by interexchange carriers to
4 report troubles on access services; ALECs can use this interface for
5 trouble reporting on designed services, such as complex private line
6 services. BellSouth also has incorporated language in interconnection
7 agreements to the effect that BellSouth will implement interfaces
8 consistent with industry standards when those standards become
9 available or finalized. However, as stated above, this is not a
10 requirement for a finding that BellSouth's interfaces provide non-
11 discriminatory access.

12

13 Q. For which function is there currently no industry standard?

14

15 A. Most notably, there is no industry standard for pre-ordering
16 transactions. The industry prioritized the development of ordering
17 standards ahead of pre-ordering, and has devoted most of its efforts to
18 date to ordering. This is a reasonable approach for the industry to
19 have taken, given that pre-ordering information -- such as obtaining
20 telephone numbers or installation dates -- is not necessary to compete
21 for the huge installed base of existing customers who might only want
22 to switch service providers. While the industry recently has begun to
23 move forward with standards development for pre-ordering, the
24 industry's definition and implementation work is far from complete.
25 However, despite the absence of industry standards for pre-ordering

1 transactions, BellSouth offers ALECs real-time, interactive access to
2 pre-ordering information. BellSouth provides that access through its
3 Local Exchange Navigation System (LENS). LENS provides access to
4 pre-ordering information in substantially the same time and manner as
5 BellSouth's retail systems, and will be described in detail in later
6 sections of this testimony. The only current alternatives to LENS are
7 either another non-standard pre-ordering interface, such as the
8 customized interface BellSouth is designing to AT&T's specifications, or
9 no pre-ordering interface at all.

10

11 Q. Despite the fact that industry standard interfaces are not a requirement
12 for non-discriminatory access, has BellSouth agreed to implement
13 industry standards as they become available?

14

15 A. Yes. As required by this Commission's arbitration orders, BellSouth's
16 interconnection agreements with AT&T, MCI and Sprint provide that
17 BellSouth will implement industry standard interfaces within a specified
18 time of the industry's adoption of standards for local service.
19 Presumably, all ALECs could request access through any interface
20 once it is developed.

21

22 Q. Does a non-standard interface necessarily result in inferior access?

23

24 A. No. To the contrary, some of BellSouth's retail systems have
25 functionality superior to that supported by industry standards, and

1 BellSouth offers ALECs that same access. For example, BellSouth
2 offers ALECs access to the same expert maintenance and repair
3 system that BellSouth uses to handle local exchange trouble reports;
4 that interface, known as the Trouble Analysis Facilitation Interface
5 (TAFI) system, will be described in detail in a later section of this
6 testimony. The TAFI functionality is far superior to the limited
7 functionality supported by the industry standard for trouble reporting.
8 TAFI allows a repair attendant to actually clear many trouble reports
9 with the customer on the line, while the industry standard merely
10 addresses functions such as electronically opening a trouble ticket or
11 obtaining status information. While there is no industry standard for the
12 superior functionality provided by the TAFI interface, it nonetheless
13 allows ALECs to handle local exchange trouble reports in substantially
14 the same time and manner as BellSouth does for its retail customers;
15 an interface that merely conformed with industry standards would be
16 inferior.

17

18 Electronic Bonding and Non-Discriminatory Access

19

20 Q. Are "machine to machine" interfaces, also known as "electronic
21 bonding", necessary for an interface to provide non-discriminatory
22 access?

23

24 A. No. While some ALECs may prefer electronic bonding arrangements,
25 the requirement is that ALECs have access to the information and

1 functions in BellSouth's operational support systems in substantially the
2 same time and manner as BellSouth. BellSouth's interfaces meet this
3 requirement.

4

5 Q. Does BellSouth's pre-ordering interface, LENS, provide ALECs with
6 access to pre-ordering information in substantially the same time and
7 manner as BellSouth's access when serving its retail customers?

8

9 A. Yes. BellSouth's pre-ordering interface, the Local Exchange
10 Navigation System (LENS), provides ALECs with real-time interactive
11 access to BellSouth's pre-ordering information, which is substantially
12 the same time and manner as BellSouth's access for its retail
13 customers. From the customer's perspective, pre-ordering interactions
14 with an ALEC using LENS are indistinguishable from pre-ordering
15 interactions with BellSouth, regardless of whether LENS meets the
16 *definition of a machine to machine interface*. Moreover, electronic
17 bonding arrangements are difficult, expensive and time-consuming to
18 implement, and, as experience in the access world has shown, are of
19 interest to only the very largest potential ALECs. While BellSouth has
20 committed through its interconnection agreements to implement
21 additional electronic bonding arrangements for pre-ordering
22 information, BellSouth nonetheless has developed the LENS pre-
23 ordering interface for the entire ALEC industry. LENS provides real-
24 time, interactive access to pre-ordering information, and is available to
25 support any ALEC that chooses to enter the Florida local market today.

1

2 Q. Are there ways other than electronic bonding in which the data from
3 LENS can be integrated with an ALEC's operational support system?

4

5 A. Yes, and that means that there is no need for an ALEC to manually re-
6 enter data obtained from LENS into the ALECs' operational support
7 systems. There are several methods for doing this that vary in their
8 degree of complexity. First, an ALEC using LENS can simply "cut and
9 paste" information from LENS into any other Microsoft Windows-
10 compatible application. In addition, the data underlying the
11 presentation screens supplied through LENS is available for
12 customization by an ALEC's software developers. That underlying data
13 is depicted on Exhibit GC-1. Finally, the data also can be provided in
14 additional formats independently of the LENS presentation screens.

15

16 Q. Please describe that process.

17

18 A. The LENS data could be provided through a process known as
19 Common Gateway Interface, or CGI. CGI is a specification for
20 communicating data between an information server, such as the LENS
21 server, and another independent application, such as an ALEC
22 operations support system. A CGI script is a program that negotiates
23 the movement of data between the server and an outside application.
24 With BellSouth's CGI specification, an ALEC could obtain and
25 manipulate data from the LENS server; using CGI, therefore, provides

1 yet another method for an ALEC to integrate the data obtained through
2 LENS with the ALEC's internal systems. BellSouth's CGI specification
3 is available to any ALEC interested in pursuing that option.
4

5 Q. Despite the fact that BellSouth's LENS pre-ordering interface is
6 sufficient to provide access to BellSouth's pre-ordering information in
7 substantially the same time and manner as BellSouth's access for its
8 retail customers, how is BellSouth working with requesting carriers to
9 develop additional pre-ordering interfaces?
10

11 A. BellSouth has negotiated an individual interconnection agreement with
12 AT&T that provides for additional customized interfaces. Under the
13 agreement with AT&T, BellSouth is developing a machine-to-machine
14 pre-ordering interface designed to AT&T's specifications. Once
15 developed, this interface also would be available to any other
16 requesting carrier. In addition, BellSouth has continued to engage in
17 discussions about other development efforts that would enable ALECs
18 to integrate the data LENS provides with an ALEC's own systems.
19 However, there is a difference between what BellSouth is willing to do
20 for ALECs as wholesale customers and what is required to provide
21 non-discriminatory access. Despite BellSouth's considerable efforts to
22 accommodate the particular requirements of individual ALECs, the key
23 point remains that machine-to-machine interfaces are not a
24 requirement for non-discriminatory access.
25

1 Q. Would electronic bonding or a machine-to-machine interface satisfy the
2 needs of all ALECs?

3

4 A. No. In fact, of the hundreds of interexchange carriers in the access
5 market today, only the very largest use the electronic bonding
6 arrangements already available for access services. Implementing
7 electronic bonding arrangements can be expensive, difficult and time-
8 consuming. Few companies have the resources or desire to make
9 these investments. If electronically bonded interfaces were the only
10 option, most ALECs would be precluded from an electronic interface.
11 To accommodate carriers that want to engage in electronic bonding,
12 BellSouth has agreed to additional development efforts in individual
13 interconnection agreements. Meanwhile, BellSouth has developed
14 interfaces for the entire ALEC industry that are non-discriminatory as
15 contemplated by the FCC.

16

17 Manual Processes And Non-Discriminatory Access

18

19 Q. Does the non-discriminatory access requirement mean that all
20 information and functions must be electronic and involve no manual
21 handling?

22

23 A. No, and in a similar proceeding in Louisiana in May, 1997, AT&T's
24 witness, Mr. Bradbury, agreed that it is not necessary to eliminate all
25 manual intervention in order for an interface to meet the non-

1 discriminatory access requirement. (Louisiana Public Service
2 Commission, Docket No. U-22252, May 28, 1997, Hearing Volume
3 Number 7, Page 1782.) In many cases, the processes by which
4 BellSouth handles its retail customers involve manual intervention.
5 Thus, non-discriminatory access to such functions for ALECs can
6 legitimately involve manual processes also.

7

8 Q. Does BellSouth have mechanized pre-ordering and ordering processes
9 for all retail services?

10

11 A. No. These processes are not fully mechanized for all retail services.
12 Many services, primarily those known as "complex" services, involve
13 substantial manual handling by BellSouth account teams. This is
14 discussed in further detail later in this testimony.

15

16 Q. Are the manual processes BellSouth uses for complex retail services
17 substantially the same processes used for the complex resold services
18 offered to ALECs?

19

20 A. Yes. The manual processes BellSouth relies on for providing many
21 complex services to its retail customers are the same processes in
22 place to support ALEC orders for the same services. The specialized
23 and complicated nature of complex services, together with their
24 relatively low volume of orders relative to basic exchange services,
25 renders them less suitable for mechanization, whether for retail or

1 resale applications. Complex, variable processes are relatively difficult
2 to mechanize, and BellSouth has concluded that mechanizing many
3 lower-volume complex retail services would be imprudent, in that the
4 benefits of mechanization would not justify the cost. Given that the
5 same manual processes are in place for both ALEC and BellSouth
6 retail orders, the processes are *competitively neutral*. If MCI or any
7 other CLEC, in exercising its independent business judgment, were to
8 reach a different conclusion, it could certainly fund the cost of complex
9 service mechanization through a bona fide request for additional
10 functionality. Later in this testimony, I will describe in detail how the
11 manual processes used by BellSouth for complex retail services are
12 virtually identical to those processes used for complex resold services.

13

14 Q. Are there other circumstances in which manual processes might be
15 appropriate?

16

17 A. Yes. Manual processes for some ALEC functions can be appropriate
18 where the volume of anticipated transactions would not justify the
19 expense of developing mechanized processes.

20

21 Interconnection Agreements and Non-Discriminatory Access

22

23 Q. Does the fact that BellSouth may have agreed to develop and provide
24 additional or different interfaces in interconnection agreements with

25

1 certain ALECs mean that BellSouth's generally available interfaces are
2 discriminatory?

3

4 A. No. The appropriate question with regard to non-discriminatory access
5 is whether both ALECs and BellSouth have access to the information
6 and functionality in BellSouth's operational support systems in
7 substantially the same time and manner. All ALECs have such access
8 to BellSouth's operations support systems pursuant to the terms of
9 BellSouth's Statement of Generally Available Terms and Conditions
10 ("SGAT" or "Statement"). In addition, any ALEC may negotiate an
11 interconnection agreement that provides substantially the same
12 operations support system access to which BellSouth may have agreed
13 in an interconnection agreement with any other ALEC.

14

15 ALEC Development Effort and Non-Discriminatory Access

16

17 Q. Does the fact that an ALEC may have to train its personnel, undertake
18 development work on its systems, or make other ongoing adjustments
19 to use BellSouth's ALEC interfaces mean that BellSouth's interfaces
20 are discriminatory?

21

22 A. No. Again, the relevant question with regard to non-discriminatory
23 access is whether both ALECs and BellSouth have access to the
24 information and functionality in BellSouth's operational support systems
25 in substantially the same time and manner. BellSouth continually

1 updates its internal systems and trains its personnel; it is reasonable to
2 expect ALECs to do likewise. For example, the Regional Negotiation
3 System (RNS) used by BellSouth retail service representatives for
4 residence services has been in use for several years, yet RNS changes
5 monthly with new software "releases" that enhance its capabilities.
6 Retail service representatives, in turn, are continually trained with each
7 new release. That ALECs may have to keep pace with similar changes
8 in the ALEC systems would appear inevitable, but not discriminatory.

9
10 **FUNCTIONAL COMPARISON OF ALEC INTERFACES**
11 **AND BELL SOUTH RETAIL SYSTEMS**

12
13 Q. Is BellSouth now able to provide non-discriminatory access to its
14 operational support systems for pre-ordering, ordering, provisioning,
15 maintenance and repair, and billing?

16
17 A. Yes. Each interface is fully operational, and is in actual use. I will
18 describe the interface for each required function below, and will show
19 how the ALEC interface provides access to the required information
20 and functions in substantially the same time and manner as BellSouth's
21 access when serving its retail customers.

22
23 Q. Does BellSouth offer interfaces in addition to those you are about to
24 describe?

25

1 A. Yes. The interfaces described in this testimony are the recommended
2 interfaces offered by BellSouth for each required function. However,
3 on the basis of legislative and regulatory activity in its region during
4 1995 and 1996, BellSouth began offering a number of interim
5 arrangements intended to support the early market entry of local
6 competitors. These interim interfaces involved a combination of
7 manual and mechanized processes, and, given that some ALECs have
8 chosen to continue with those processes rather than avail themselves
9 of BellSouth's recommended interfaces, the earlier interfaces are still
10 available as well. In addition, BellSouth has committed in individual
11 interconnection agreements to develop customized interfaces built to
12 the specifications of individual parties, such as AT&T.

13

14 PRE-ORDERING

15

16 Q. How is pre-ordering defined?

17

18 A. The FCC's Part 51 Interconnection Rules define pre-ordering and
19 ordering collectively as including "the exchange of information between
20 telecommunications carriers about current or proposed customer
21 products and services or unbundled network elements or some
22 combination thereof."

23

24 Q. What does pre-ordering information mean in customer terms?

25

1 A. As the FCC's definition implies, there is no strict delineation between
2 pre-ordering and ordering, as many "pre-ordering" activities generally
3 occur in the context of actually negotiating a service order. As will be
4 discussed later in this testimony in the context of complex services,
5 pre-ordering activities can vary considerably depending upon the
6 service involved. However, pre-ordering information generally refers to
7 accessing the following information and functions while discussing an
8 order for basic exchange service with an end user customer: (1) street
9 address validation; (2) telephone number information; (3) services and
10 features information; (4) due date information; (5) customer service
11 record information.

12

13 Q. Is pre-ordering information necessary for most service orders an ALEC
14 might place?

15

16 A. No. There is a limited need for pre-ordering information for orders
17 involving existing customers who already have telephone numbers and
18 installed services and who just want to switch service providers.

19

20 Q. Did this Commission require BellSouth to provide an electronic
21 interface for pre-ordering information?

22

23 A. Yes. In the MCI and AT&T arbitration orders, this Commission required
24 BellSouth to develop real-time and interactive interfaces to support pre-
25 ordering; BellSouth's pre-ordering interface meets this requirement.

1

2 Q. How does BellSouth perform pre-ordering transactions for its retail
3 customers?

4

5 A. BellSouth primarily uses three systems, based on whether the
6 customer is a residence or business subscriber, and based on the
7 customer's location. BellSouth uses a system known as the Regional
8 Negotiation System (RNS) for most types of residence orders. For
9 business customers in Alabama, Kentucky, Louisiana, Mississippi and
10 Tennessee, BellSouth uses a system known as the Service Order
11 Negotiation System (SONGS); for business customers in Florida,
12 Georgia, North Carolina and South Carolina, a system known as Direct
13 Order Entry (DOE) is used. SONGS and DOE also are used by service
14 representatives for residence customer transactions not supported by
15 RNS. Each of these systems accesses the necessary operational
16 support systems and databases to obtain most pre-ordering information
17 on a real-time, interactive basis. RNS is a newer system that provides
18 more English-language and point-and-click capabilities. SONGS and
19 DOE are older systems that are less user friendly, relying more on the
20 use of special codes and function keys.

21

22 Q. Please describe the ALEC interface for pre-ordering transactions.

23

24 A. The LENS interface discussed earlier offers ALECs real-time,
25 interactive access to pre-ordering information, and an integrated direct

1 order entry capability that will be described in the ordering section of
2 this testimony. LENS is superior to the BellSouth systems in that it
3 provides a single interface for both residence and business, and
4 supports all states in the BellSouth region. LENS allows the ALEC to
5 enter a pre-ordering transaction interactively, using prompts and screen
6 displays. The interface converts the ALEC inputs into support system
7 commands and database queries as appropriate to obtain the
8 information from a number of BellSouth operations support systems
9 and corporate databases, freeing the ALEC from having to separately
10 access each downstream system and database. The information is
11 collected in real-time from the various sources, and is returned
12 electronically to the ALEC on a real-time basis. A chart showing that
13 LENS and RNS access BellSouth's pre-ordering databases in
14 substantially the same time and manner is provided as Exhibit GC-2.
15 Pre-ordering consists of a number of functions, which I now will
16 address individually.

17

18 Address Validation

19

20 Q. Does BellSouth provide ALECs with access to BellSouth's address
21 validation information and functions in substantially the time and
22 manner as BellSouth's access for BellSouth's retail customers?

23

24 A. Yes.

25

1 Q. How does BellSouth perform address validation when serving its retail
2 customers?

3

4 A. Again, this depends upon the type of customer, and the customer's
5 location. For residence customers, BellSouth uses the address
6 validation screen in RNS. A copy of an actual address validation
7 screen seen by a BellSouth service representative using RNS is
8 attached as Exhibit GC-3. For business customers in Florida,
9 BellSouth uses the address validation screens in DOE. A copy of
10 actual address validation screens seen by a BellSouth service
11 representative using DOE is attached as Exhibit GC-4. Using these
12 screens, the BellSouth service representative sends an inquiry to, and
13 receives a response from, the BellSouth database containing address
14 information.

15

16 Q. How does an ALEC perform address validation?

17

18 A. The ALEC uses the address validation screens in LENS. A copy of
19 such screens as seen by the ALEC using LENS is provided as Exhibit
20 GC-5. Using these screens, the ALEC representative sends an inquiry
21 to, and receives a response from, the same BellSouth database
22 containing address information that is accessed by RNS and DOE.
23 That database returns address information without regard to whether
24 the request originated from an ALEC or from BellSouth. As seen on

25

1 those screens, LENS provides community name abbreviations required
2 for service orders, and other useful information, such as zip codes.

3

4 Q. Does LENS provide an exact duplicate of the information seen on the
5 address validation screens in BellSouth's retail systems?

6

7 A. No, not necessarily. In some cases the same information is provided in
8 a different location. For example, the address validation screen in DOE
9 provides the identification of the serving central office for the
10 customer's address. However, the serving central office information
11 affects both the telephone numbers that can be assigned and the
12 services available in that office. Therefore, LENS displays this
13 information on both the telephone number screen and the products and
14 services screens. This is shown on Exhibits GC-6 and GC-7 in the
15 fields labeled "CLLI".

16

17 Telephone Number Selection

18

19 Q. Does BellSouth provide ALECs with access to telephone number
20 information and functions in substantially the same time and manner as
21 BellSouth's access for its retail customers?

22

23 A. Yes.

24

25

1 Q. How does BellSouth perform telephone number selection when serving
2 its retail customers?

3

4 A. Again, this depends upon the type of customer, and the customer's
5 location. For residence customers, BellSouth uses the telephone
6 number selection screen in RNS. A copy of an actual telephone
7 number selection screen seen by a BellSouth service representative
8 using RNS is attached as Exhibit GC-8. For business customers in
9 Florida, BellSouth uses the telephone number selection screen in DOE.
10 A copy of an actual telephone number selection screen seen by a
11 BellSouth service representative using DOE is attached as Exhibit GC-
12 9. Using these screens, the service representative sends an inquiry to,
13 and receives a response from, the BellSouth database containing
14 telephone number information.

15

16 Q. How does an ALEC perform telephone number selection?

17

18 A. The ALEC uses the telephone number selection screen in LENS. A
19 copy of the telephone number selection screen seen by the ALEC
20 using LENS is provided as Exhibit GC-6. Using this screen, the ALEC
21 representative sends an inquiry to, and receives a response from, the
22 same BellSouth database containing telephone number information
23 that is accessed by RNS and DOE. That system provides telephone
24 number information without regard to whether the request originates
25 from an ALEC or from BellSouth.

1

2 Q. Does the LENS system allow for selection of special telephone
3 numbers, such as contiguous blocks of numbers, vanity numbers and
4 easy numbers, without manual intervention of BellSouth service
5 representatives?

6

7 A. Yes. All telephone number inventory management functions are done
8 by the same BellSouth telephone number support system, regardless
9 of whether the telephone numbers are being selected through LENS,
10 RNS or DOE. Thus, the ALEC has substantially the same ability to
11 select special telephone numbers using LENS as BellSouth would have
12 using RNS or DOE, and in several respects the special number
13 capabilities of LENS are superior to those available to BellSouth's
14 service representatives. The easiest way to compare these capabilities
15 is to look at the actual screens seen by BellSouth service
16 representatives and by users of LENS. For example, referring again to
17 Exhibit GC-8, the RNS telephone number selection screen used by
18 BellSouth's residence service representatives has selections for "easy"
19 number, "stylist" numbers, and "sequential" numbers. (The terms stylist
20 and vanity are interchangeable, as both allow a search for a number
21 that spells a particular word of interest to the customer.) Again, Exhibit
22 GC-6 shows the telephone number selection screen from LENS. The
23 first page of that exhibit shows the basic capability to request a random
24 number assignment, as well as requesting a vanity number, by filling in
25 the desired number in the "special number" fields. It also shows that

1 the customer can request that a number exclude specific digits that the
2 customer might consider, for example, to be "bad luck" numbers. The
3 second page of the LENS exhibit shows that in addition to those
4 capabilities, by clicking on the drop-down box for "Options", the ALEC
5 can request number assignments of specific patterns, such as "easy"
6 numbers, ascending or descending line digits, identical line digits, or
7 sequential line numbers. Thus, the ALEC using LENS currently has
8 more telephone number assignment options to offer its customers than
9 BellSouth's service representatives have available for BellSouth's retail
10 customers.

11

12 Q. Does BellSouth limit new entrants to a maximum of 100 reserved
13 telephone numbers in a given central office at any point in time, and if
14 so, why?

15

16 A. BellSouth does limit telephone numbers that can be pre-reserved (i.e.,
17 held independently of an associated request for service) to 100 per
18 central office, or five percent of the numbers available in an office,
19 whichever is less. This is not a LENS limitation, but is a practice
20 implemented by BellSouth as a means to administer the finite pool of
21 numbers for the benefit of all, as ALECs have the capability to reserve
22 telephone numbers in anticipation of future orders for service. This
23 practice does not limit an ALEC's ordering activity, as numbers
24 associated with actual orders for service do not count against the total
25 reserved numbers, and the supply of numbers can be replenished

1 daily. This practice merely prevents any one carrier from "locking up"
2 available telephone numbers in the absence of actual customer orders.

3

4 Products and Services

5

6 Q. Does BellSouth provide ALECs with access to product and service
7 information and functions in substantially the same time and manner as
8 BellSouth's access for its retail customers?

9

10 A. Yes.

11

12 Q. How does BellSouth check the availability of products and services
13 when serving its retail customers?

14

15 A. Again, this depends upon the type of customer, and the customer's
16 location. For residence customers, BellSouth uses services screens in
17 RNS. A copy of an actual services screen seen by a BellSouth service
18 representative using RNS is attached as Exhibit GC-10. For business
19 customers in Florida, BellSouth uses the product and services screens
20 in DOE. A copy of the actual product and services main menu screen
21 seen by a BellSouth service representative using DOE is attached as
22 Exhibit GC-11. Using these screens, the service representative sends
23 an inquiry to, and receives a response from, the BellSouth database
24 containing product and service information.

25

1 Q. How does an ALEC check the availability of products and services?

2

3 A. The ALEC uses the comparable product and services screens in LENS.

4 An example of a product and services screen seen by an ALEC using

5 LENS is provided as Exhibit GC-7. Using these screens, the ALEC

6 representative sends an inquiry to, and receives a response from, the

7 same BellSouth databases containing product and service information

8 that are accessed by RNS and DOE. These databases provide

9 product and service information without regard to whether the request
10 originates from an ALEC or from BellSouth.

11

12 Obtaining Due Dates

13

14 Q. Does BellSouth provide ALECs with access to BellSouth's due date
15 information and functions in substantially the same time and manner as
16 BellSouth's access for its retail customers?

17

18 A. Yes.

19

20 Q. How does BellSouth obtain due dates when serving its retail
21 customers?

22

23 A. Again, this depends upon the type of customer, and the customer's
24 location. For residence customers, BellSouth uses the due date screen
25 in RNS. A copy of an actual due date screen seen by a BellSouth

1 service representative using RNS is attached as Exhibit GC-12. For
2 business customers in Florida, there is a space on a DOE screen
3 where a service representative can input a due date; this is shown in
4 Exhibit GC-13. By these methods, the service representative sends an
5 inquiry to, and receives a response from, the BellSouth database
6 containing due date information, known as the Direct Order Entry
7 Support Application Program (DSAP).

8

9 Q. How does an ALEC obtain due dates?

10

11 A. The ALEC uses the due date fields in LENS. A copy of the screen
12 seen by the ALEC using LENS for this purpose is provided as Exhibit
13 GC-14. Using this screen, the ALEC representative sends an inquiry to,
14 and receives a response from, DSAP; this is the same BellSouth
15 database containing due date information that is accessed by RNS and
16 DOE. DSAP provides due date information without regard to whether
17 the request originates from an ALEC or from BellSouth.

18

19 Q. Are due dates calculated as a stand-alone pre-ordering function for
20 either BellSouth retail customers or ALEC customers?

21

22 A. No. During the arbitrations we became accustomed to calling due
23 dates "pre-ordering" because the due date is information that typically
24 is given to customers for basic exchange services while discussing a
25 customer's order. In actuality, though, the due date cannot be

1 calculated by BellSouth's system until that system has all the
2 information about what is actually being ordered and can evaluate the
3 service order as a package. Due date calculation from a system
4 perspective is not a stand-alone pre-ordering function.

5

6 Q. How are due dates calculated through LENS?

7

8 A. Due dates are calculated through LENS via real-time, interactive
9 access to BellSouth's due date information, in substantially the same
10 time and manner as through BellSouth's access. LENS obtains due
11 date information from the Direct Order Entry Support Application
12 Program (DSAP), just as BellSouth's negotiation systems do. DSAP
13 calculates due dates based on an intricate set of logic incorporating all
14 the variables that can influence due dates. For both LENS orders and
15 BellSouth retail orders, DSAP looks at the totality of the services on a
16 particular order, determines the nature of the work that must be
17 performed (such as whether an outside technician is required),
18 evaluates such factors as the work load for the area in which service
19 will be provided, and returns the due date that should be offered to the
20 customer. For both retail and ALEC orders, however, for this
21 evaluation to take place, DSAP must know which services are being
22 ordered, and must look at the entire order as a package. Although
23 DSAP does not calculate a due date for a LENS due date inquiry that is
24 not associated with an order, this is not discriminatory. Due dates are
25 not calculated independently of the ordering function for BellSouth's

1 retail customers, either. BellSouth service representatives using DOE
2 can view the installation calendar from DSAP. Likewise, BellSouth has
3 loaded LENS with an installation calendar from DSAP that contains a
4 dynamic table of projected service intervals and other due-date
5 affecting information from DSAP that the ALEC can use to respond to
6 inquiries not associated with the ordering function. This accommodates
7 ALECs who wish to use LENS for pre-ordering and another option for
8 ordering.

9

10 Q. Does LENS provide due date information for all products and services?

11

12 A. No. LENS does not contain due date information for all products and
13 services, however, due dates are not available electronically for all
14 BellSouth retail services, either. For example, due dates for complex
15 services can vary considerably, depending upon the complexity and
16 scope of the service involved, and typically are offered on either a
17 negotiated or "Customer Desired Due Date" basis.

18

19 Customer Record Information

20

21 Q. Has this Commission required BellSouth to provide ALECs with on-line
22 access to customer service record (CSR) information?

23

24 A. Yes. This Commission required BellSouth to develop a real-time
25 operational interface to deliver CSRs to ALECs, and further ordered that

1 the interface should provide only the customer information necessary for
2 MCI and AT&T to provide telecommunications services.

3

4 Q. Has BellSouth complied with this requirement?

5

6 A. Yes. On-line access to customer service record information is available
7 through LENS. Copies of actual customer service record screens seen
8 by ALECs using LENS are provided as Exhibit GC-15.

9

10 LENS ARCHITECTURE

11

12 Q. In similar proceedings in other states, AT&T has raised concerns about
13 the "web-based architecture" in LENS, and introduced decisions from
14 state commissions outside the BellSouth region about a supposedly-
15 similar interface provided by U.S. West. Is there a state commission
16 decision within the BellSouth region that addressed the actual pre-
17 ordering interface being provided by BellSouth?

18

19 A. Yes. During the AT&T arbitration proceedings, the Georgia Public
20 Service Commission heard extensive testimony from both AT&T and
21 BellSouth on the technical aspects of the interface BellSouth proposed
22 for pre-ordering, now known as LENS. In that proceeding, the Georgia
23 Commission heard AT&T's claims that LENS requires a new entrant to
24 manually re-enter data, or that the web server architecture would result
25 in inferior access to pre-ordering information.

1

2 Q. What did the Georgia Commission decide?

3

4 A. The Georgia Commission found that BellSouth's proposed interfaces,
5 which included the "web-based" interface for pre-ordering information --
6 now known as LENS -- complied with previous orders of that
7 commission; those previous orders required BellSouth to provide
8 access to resellers equivalent to that of the incumbent LEC. (Orders of
9 Georgia Public Service Commission dated December 3, 1996 in
10 Docket No. 6801-U, and June 13, 1996 in Docket No. 6352-U.)

11

12 Q. In the other state proceedings, has AT&T provided any information to
13 support its contention that BellSouth's LENS pre-ordering interface and
14 the U.S. West "web page" interface are technically alike?

15

16 A. No. First, other than AT&T's assertion that U. S. West's and
17 BellSouth's interfaces are both "web-based" (and the fact that the word
18 "web" -- web-based vs. web page -- appears in descriptions of both),
19 AT&T provides no facts to indicate that the interfaces are technically
20 alike. Furthermore, based on my review, the state commission orders
21 cited by AT&T do not contain any information indicating that the U.S.
22 West interface is comparable to BellSouth's LENS interface. In
23 contrast, the Georgia Public Service Commission looked specifically at
24 the merits of BellSouth's interface in reaching its decision that
25 BellSouth's proposed development was consistent with that

1 commission's requirements.

2

3 ORDERING AND LOCAL ACCOUNT MAINTENANCE

4

5 Q. How does the FCC define ordering information?

6

7 A. Again, the FCC's Part 51 Local Interconnection Rules define pre-
8 ordering and ordering together as including the exchange of
9 information about current or proposed customer products and services
10 or unbundled network elements or some combination thereof.

11

12 Q. Does BellSouth provide ALECs with access to ordering information in
13 substantially the same time and manner as BellSouth's access for its
14 retail customers?

15

16 A. Yes.

17

18 Q. Has this Commission previously required BellSouth to provide
19 electronic ordering?

20

21 A. Yes. In its order in the AT&T and MCI arbitration proceeding, this
22 Commission noted that BellSouth was developing electronic interfaces
23 for this process, and required BellSouth to continue to develop the
24 electronic interfaces for order processes.

25

1 Q. Has BellSouth complied with this requirement?

2

3 A. Yes.

4

5 Q. How does BellSouth handle ordering and local account maintenance
6 transactions for its retail customers?

7

8 A. BellSouth primarily uses four systems. BellSouth has different systems
9 for residence and business customers, for local exchange service and
10 for access. The systems also vary by customer location. Three of
11 these systems -- RNS, DOE and SONGS -- are the same ones already
12 described in the pre-ordering section of this testimony. The fourth
13 system is the Exchange Access Control and Tracking system (EXACT),
14 which has been used for access orders for all BellSouth states for 12
15 years. Each system functions somewhat differently, and they vary
16 considerably in their degree of "user friendliness." In general, however,
17 these systems accomplish the task of accumulating and formatting the
18 information, such as the pre-ordering information described earlier in
19 this testimony, required to enter an order into BellSouth's Service Order
20 Control System, also known as "SOCS." For RNS and DOE,
21 BellSouth's service representatives use RNS and DOE screens such
22 as those provided as exhibits for the pre-ordering section of this
23 testimony, as well as additional ordering screens of the same nature.
24 Copies of EXACT screens used to process access service requests are
25 provided as Exhibit GC-16.

1

2 Q. Please describe BellSouth's ALEC ordering systems.

3

4 A. There are two industry-standard ALEC ordering systems, depending on
5 the service type. The first is Electronic Data Interchange (EDI) for
6 resale orders and simple unbundled network elements such as unbundled
7 ports. The second is the same Exchange Access Control and Tracking
8 (EXACT) system used for access orders; EXACT is used by ALECs for
9 interconnection trunking and other complex unbundled network
10 elements. In addition, while LENS is primarily a pre-ordering interface,
11 BellSouth offers an interactive, direct order entry capability through
12 LENS. While there is no industry standard for the pre-ordering
13 capability in LENS, the LENS ordering capability does support the
14 Ordering and Billing Forum's (OBF)-approved local service ordering
15 requests.

16

17 Q. Please describe the EXACT ordering interface in more detail.

18

19 A. The EXACT ordering system is the same industry-standard interface
20 used by BellSouth for processing access service requests from
21 interexchange carriers. This interface also supports ALEC
22 "infrastructure" orders, primarily for interconnection trunking and many
23 unbundled network elements. This system supports industry standard
24 ordering processes.

25

1 Q. Please describe the EDI ordering interface in more detail.

2

3 A. EDI is the electronic interface sanctioned by the national Ordering and
4 Billing Forum (OBF) for local service request communications. Using
5 this interface, the ALEC will transmit service requests in OBF standard
6 format to BellSouth. BellSouth has no way of knowing precisely how
7 the screens used by an ALEC using EDI will look, because EDI defines
8 only the standards for the exchange of information, and not for how it is
9 displayed by either party's computer system. However, to provide this
10 Commission with a view of how an ALEC can use EDI to order resold
11 services or simple unbundled network elements from BellSouth, I have
12 attached several prints of screens from a commercially-available
13 version of EDI-compatible software that an ALEC can use to order from
14 BellSouth via EDI if the ALEC chooses not to develop its own
15 presentation system. Copies of those screens are attached as Exhibit
16 GC-17.

17

18 Q. Are there other EDI options available?

19

20 A. Yes. For ALECs choosing to use an off-the-shelf, commercially
21 available version of EDI desktop software, training and documentation
22 on that software is provided by Harbinger, the third party that
23 developed the software package based on the specifications that
24 BellSouth made available. That software package also is covered in
25 the ALEC conferences.

1

2

3 Q. Which services can be ordered via the EDI interface today?

4

5 A. The EDI interface currently supports electronic ordering for 34 resale
6 services, and some unbundled network elements.

7

8 Q. Does this include any complex business services?

9

10 A. Yes. EDI currently can be used to order some complex business
11 services, including PBX trunks, SynchroNet® (a private line data
12 service), ISDN-Basic-Rate service, and hunting. Complex services
13 requiring account team handling, such as MultiServ® service, are not
14 currently supported by EDI, but are handled in the same manner for
15 both ALEC and BellSouth retail customers.

16

17 Q. Can ALECs order unbundled network elements (UNEs) via the EDI
18 interface?

19

20 A. Yes. While it is important to note that many unbundled network
21 elements are infrastructure elements, such as trunking, that are
22 ordered via EXACT, EDI supports the simpler, more end user
23 customer-oriented elements and combinations, such as loops, ports,
24 and interim number portability that have been defined by the Ordering
25 and Billing Forum. These UNEs also can be ordered via LENS. As

1 shown on page one of Exhibit GC-17 (the EDI ordering screens), in the
2 "Document Type" column, the menu includes purchase orders (PO-
3 850) and purchase order confirmations (PO-860) for both resale and
4 unbundled network elements. Page two of that exhibit shows the UNE
5 folder of a local service request, with the appropriate quantity fields to
6 request the number of paths for a ported number.

7

8 Q. Please describe the LENS ordering capability.

9

10 A. For ALECs who choose to forego the industry-standard EDI interface,
11 LENS offers an integrated ordering capability. ALECs choosing to
12 order through LENS use LENS screens such as those provided as
13 exhibits for the pre-ordering section of this testimony, as well as
14 additional LENS ordering screens of the same nature.

15

16 Q. When an ALEC submits orders through either EDI or LENS, what is the
17 first step in processing those orders on BellSouth's side of the ordering
18 interface?

19

20 A. Requests successfully received and processed by EDI or LENS will be
21 passed to BellSouth's Local Exchange Ordering (LEO) database. This
22 is depicted in the drawing provided as Exhibit GC-18. LEO will
23 perform certain edit checks and data formatting checks to determine if
24 the required information has been provided. If not, the system will
25 return error messages similar to those received by BellSouth service

1 representatives. This helps to ensure a complete and correct order
2 entry.

3

4 Q. What is the next step?

5

6 A. LEO will pass a complete and correct service request to BellSouth's
7 Local Exchange Service Order Generator (LESOG) for mechanized
8 order generation, or to a Local Carrier Service Center worklist for
9 further handling by a BellSouth service representative. This also is
10 depicted on Exhibit GC-18. LESOG will mechanically format many
11 service requests into BellSouth service order record formats which can
12 be handled by SOCS and the other downstream systems through
13 which BellSouth's service orders are also processed; LESOG requires
14 no manual intervention by a BellSouth service representative.

15

16 Q. Which orders are mechanically generated by LESOG?

17

18 A. Exhibit GC-19 lists the orders for which mechanized order generation is
19 available. Collectively these services represent most of BellSouth's
20 total retail operating revenue.

21

22 Q. Does BellSouth's EDI ordering interface nonetheless provide ordering
23 functionality in substantially the same time and manner as BellSouth's
24 access for its retail customers?

25

1 A. Yes, because BellSouth does not use mechanized ordering, with the
2 customer on the line, for all of its retail services.

3

4 Q. Can you give an example of a complex service for which retail ordering
5 is not fully mechanized?

6

7 A. SmartRing® service is a private line service available to both retail
8 customers and to resellers. In both cases, the pre-ordering and
9 ordering processes for SmartRing® service are largely manual.
10 Nonetheless, the pre-ordering and ordering processes are virtually
11 identical for both retail and ALEC orders, except that retail services are
12 handled primarily by the appropriate business unit for each situation --
13 BellSouth Business Systems (BBS) personnel for retail services, and
14 InterConnection Services (ICS) personnel for resale services.

15

16 Q. Please describe some of the manual activities involved in providing a
17 retail or resold SmartRing® service.

18

19 A. To perform the pre-ordering activity known as the "service inquiry", a
20 systems designer on the appropriate account team fills out an
21 extensive paper form, and then provides that form to a project manager
22 for further manual activities. This is done for both retail and resale
23 orders. Upon approval of either the retail customer or the ALEC, as
24 appropriate, the paper service inquiry is re-initiated as a firm order,
25 which also is an extensive paper form with subsequent manual

1 distribution. In both the retail and the resale cases, the Firm Order
2 Package is manually handed off to the service center, where paper
3 service order worksheets are created to assist in initiating service
4 orders in the ordering system. At that point, orders are typed into the
5 appropriate service order system for the customer's location, which is
6 substantially the same system regardless of whether the SmartRing®
7 service order is for a retail or ALEC customer. This subsequent order
8 entry is the same for both the retail and the resale situations, and thus
9 does not result in a different customer "experience" in either case.
10 After the typist inputs the service orders, the account team and project
11 manager are notified by e-mail of the service order numbers and due
12 dates. The account team then manually reviews the service orders for
13 accuracy and follows up as necessary. Again, these processes, with
14 their substantial reliance on manual handling and paper forms, are
15 common to both retail and ALEC orders.

16

17 Q. Does a BellSouth Interconnection Services Account Team provide the
18 same level of support to ALECs ordering complex services as the
19 BellSouth Business Systems Account Team provides to retail
20 customers ordering such services?

21

22 A. Yes. Account teams have a critical role in pre-ordering and ordering
23 activities for both retail and resale complex services. For complex
24 services such as SmartRing® service, the appropriate BellSouth
25 account team is an integral part of the pre-ordering and ordering

1 processes for both retail and ALEC customers. For both retail and
2 ALEC SmartRing® service orders, as well as for other types of complex
3 orders, the process involves manual intervention and is handled by an
4 account team. The outcome therefore is competitively neutral.

5

6 Q. Does the "batch" nature of the EDI interface mean that an ALEC's
7 orders will be delayed?

8

9 A. No. Batch times can be adjusted to accommodate the needs of
10 ALECs. While the EDI batches currently are set up to run every 30
11 minutes, they can be adjusted to accommodate specific market needs.
12 For example, access service requests sent through the EXACT batch
13 method are processed every fifteen minutes; the intervals can be even
14 shorter, depending on the market need.

15

16 PROVISIONING

17

18 Q. How does the FCC define provisioning?

19

20 A. According to the FCC's Part 51 Local Interconnection Rules,
21 "provisioning" involves the exchange of information between
22 telecommunications carriers where one executes a request for a set of
23 products and services or unbundled network elements or combination
24 thereof from the other with attendant acknowledgments and status
25 reports. The type of information to which these rules refer generally is

1 described in terms of firm order confirmations, completion notifications,
2 and other types of order status reports, such as those indicating missed
3 appointments.

4

5 Q. Does BellSouth provide ALECs with access to provisioning information
6 in substantially the same time and manner as BellSouth's access for its
7 retail customers?

8

9 A. Yes.

10

11 Q. How does BellSouth obtain a notification that an order has been
12 released for processing?

13

14 A. When a BellSouth service representative using RNS releases a service
15 order, the system returns a message indicating that the order has been
16 issued. This is a confirmation that the order has been released for
17 processing by BellSouth's Service Order Control System (SOCS), and
18 is not a confirmation that the order has passed all SOCS edit checks.
19 A copy of the RNS message screen is attached as Exhibit GC-20.

20

21 Q. How would an ALEC obtain similar information?

22

23 A. If the ALEC were ordering through LENS, the ALEC would receive a
24 message similar to that received by the BellSouth service
25 representative, indicating that the order had been submitted. A copy of

1 the relevant LENS screen is provided as Exhibit GC-21; that screen
2 provides the same level of detail available to a BellSouth service
3 representative through RNS, as seen on Exhibit GC-20.

4

5 Q. Can ALECs obtain other provisioning information?

6

7 A. Yes. ALECs can obtain firm order confirmations, completions
8 information, error notifications, and other status information. For
9 example, Exhibit GC-22 shows a LENS screen used to obtain firm
10 order confirmations and completions information. Exhibit GC-23 shows
11 a LENS error notification screen. Exhibit GC-24 shows a LENS status
12 information screen.

13

14 Maintenance and Repair

15

16 Q. How does the FCC Order define maintenance and repair?

17

18 A. The FCC rules define "maintenance and repair" as involving the
19 exchange of information between telecommunications carriers where
20 one initiates a request for maintenance or repair of existing products
21 and services or unbundled network elements or combination thereof
22 from the other with attendant acknowledgments and status reports.

23

24

25

1 Q. Has BellSouth provided ALECs with access to the maintenance and
2 repair function in substantially the same time and manner as
3 BellSouth's access for its retail customers?
4

5 A. Yes.
6

7 Q. Has this Commission ordered BellSouth to provide a trouble reporting
8 interface?
9

10 A. Yes. In the AT&T and MCI arbitration proceedings, this Commission
11 ordered BellSouth found that a real-time interactive operational interface
12 for trouble reporting is necessary, and should be provided by BellSouth.
13

14 Q. Has BellSouth complied with this requirement?
15

16 A. Yes.
17

18 Q. What system is used by BellSouth's repair attendants when handling
19 trouble reports for basic exchange service customers?
20

21 A. BellSouth repair attendants process these trouble reports using a
22 system known as the Trouble Analysis Facilitation Interface (TAFI).
23 BellSouth's business and residence repair center attendants use either
24 a business or residence version of TAFI, respectively.
25

1 Q. Please describe the BellSouth TAFI system.

2

3 A. TAFI is a user friendly interface that often enables trouble reports to be
4 cleared remotely, by the repair attendant handling the initial customer
5 contact, often with the customer still on the line. With this system, any
6 repair attendant can correctly handle a trouble report on any BellSouth-
7 provided basic exchange service.

8

9 Q. Does TAFI provide electronic access to other BellSouth systems that
10 might be involved in resolving a trouble report?

11

12 A. Yes. TAFI automatically interacts with the correct BellSouth system for
13 a given situation. The system will automatically go to the correct
14 system associated with a given telephone number, and will execute the
15 appropriate test or retrieve the appropriate data. For example, if a
16 customer were to report that the customer's call forwarding feature was
17 not working, the TAFI system might check the customer's records to
18 see if the line should be equipped with the feature, and would
19 electronically verify that the feature was programmed in the switch
20 serving that customer's line. Once the TAFI analysis of the trouble is
21 complete, TAFI provides a recommendation of what is needed to
22 correct the problem, and in some cases actually implements the
23 corrective action. In the above example, TAFI might instruct the repair
24 attendant to have the customer contact the business office to add the

25

1 feature, or might correct the trouble by implementing a translation
2 change in the switch to add the feature to the line.

3

4 Q. How does a repair attendant use TAFI ?

5

6 A. TAFI is a common presentation expert system that provides rapid,
7 consistent, and efficient automated trouble receipt, screening and
8 problem resolution. It is an interactive system that prompts the repair
9 attendant with questions and instructions while automatically interacting
10 with other internal systems as appropriate. TAFI also provides for the
11 queuing of reports enabling the repair attendant to work on several
12 customer troubles simultaneously, and it also provides on-line
13 reference tools. TAFI also can be used to view maintenance histories.

14

15 Q. Has BellSouth provided ALECs with access to its TAFI system in
16 substantially the same time and manner as BellSouth's access for its
17 retail customers?

18

19 A. Yes, and in some respects, the access is superior. The ALEC TAFI
20 system contains all the functionality described above that is contained
21 in the BellSouth TAFI system. Furthermore, the ALEC TAFI systems
22 combines the functionality of the separate business and residence
23 versions of TAFI used by BellSouth's repair attendants, giving the
24 ALEC a single system for all types of basic exchange service trouble
25 reports. In addition, by providing access to TAFI, BellSouth is making

1 available to ALECs the functionality inherent in the many systems with
2 which TAFI connects.

3

4 Q. Are there any differences between the ALEC TAFI system functionality
5 and the BellSouth TAFI system functionality?

6

7 A. The only difference is a security step that occurs electronically and
8 nearly instantaneously. The ALEC TAFI system contains a security
9 screening step that is required to ensure the confidentiality of each
10 ALEC's information, because the ALEC TAFI system will be used by
11 repair attendants from multiple ALECs. Therefore, TAFI identifies each
12 ALEC's repair attendants by company, and allows each ALEC's repair
13 attendants to access records only for that ALEC's customers. Once
14 that validation check has been performed, the ALEC repair attendant
15 has access to the full range of TAFI functionality that is available to
16 BellSouth repair attendants for both business and residence exchange
17 services.

18

19 Q. What services does TAFI support?

20

21 A. BellSouth uses TAFI to handle trouble reports for both business and
22 residence basic local exchange services, including a wide range of
23 features and functions associated with both residence and business
24 basic exchange services. The function and sub-function menus
25 included in Exhibit GC-25 provide an indication of the depth of TAFI's

1 abilities to process troubles. Furthermore, even for trouble reports on
2 complex services that involve exchange services, such as MultiServ®
3 service or PBX trunks, an ALEC can use TAFI to input trouble reports,
4 obtain commitment times, and check the status of previously entered
5 reports. A ALEC also can use TAFI in this manner to report troubles
6 associated with unbundled network elements that can be identified with
7 a telephone number, such as unbundled ports or interim number
8 portability.

9

10 Q. Other than the security check described above, does TAFI function
11 identically for ALECs and for BellSouth?

12

13 A. Yes. Exhibits GC-25 provides examples of the screens seen by both
14 ALEC and BellSouth repair attendants for a trouble report involving the
15 call forwarding feature. While there are numerous screens that could
16 be involved depending on the nature of the trouble report, the key point
17 is that no matter what the situation, both the ALEC and BellSouth repair
18 attendants have access through TAFI to substantially the same
19 information and functions.

20

21 Q. Do ALECs use TAFI in substantially the same time and manner as
22 BellSouth's use for its retail customers?

23

24

25

1 A. Yes, and again, the ALEC access is superior in that, unlike BellSouth's
2 systems, ALECs have a single interface for both residence and
3 business services.

4

5 Q. Do ALECs have other options for electronic trouble reporting?

6

7 A. Yes. For "designed" or "special" services -- principally those identified
8 with a circuit number rather than the telephone number-identified
9 services handled by TAFI -- ALECs can report troubles through the
10 same *electronic bonding interface* currently used by interexchange
11 carriers for access services. In addition, at AT&T's request, BellSouth
12 has agreed to develop a local exchange trouble reporting system
13 similar to the existing interexchange carrier gateway, known as the
14 Electronic Communications Gateway. This will be developed by
15 December, 1997.

16

17 Billing Interfaces

18

19 Q. How does the FCC define billing?

20

21 A. The FCC's Part 51 Local Interconnection Rules define "billing" as
22 involving the provision of appropriate usage data by one
23 telecommunications carrier to another to facilitate customer billing with
24 attendant acknowledgments and status reports. It also involves the

25

1 exchange of information between telecommunications carriers to
2 process claims and adjustments.

3

4 Q. Does BellSouth provide ALECs with access to billable usage
5 information in substantially the same time and manner as BellSouth's
6 access for its retail customers?

7

8 A. Yes.

9

10 Q. Is a Carrier Access Billing System (CABS)-formatted bill for all services
11 a requirement for non-discriminatory access to billing information?

12

13 A. While this is a requirement of this Commission's AT&T and MCI
14 arbitration decision, BellSouth does not bill its end user customers
15 through a single CABS bill for all services. Therefore, this is not
16 necessary for BellSouth to offer ALECs access to BellSouth's billing
17 information and functions in substantially the same time and manner as
18 BellSouth's access. Nonetheless, BellSouth is implementing this
19 capability, and is scheduled to begin testing with ALECs in July.

20

21 Q. Through which billing systems does BellSouth render bills to its end
22 user customers?

23

24 A. BellSouth uses two billing systems to bill its end user customers.
25 Depending on the services being provided, the same customer will

1 receive two types of bills. For services ordered from the General
2 Subscriber Services Tariff (GSST) and the Private Line Services Tariff
3 (PLT), BellSouth renders bills from CRIS. For services ordered from
4 the Access Services Tariff (AST), BellSouth renders bills from the
5 CABS, even if the access service is ordered by and billed to the end
6 user customer. This means that one end user customer with services
7 from both billing systems will receive both CABS and CRIS bills.
8 BellSouth's non-discrimination obligation is to provide new entrants with
9 access to information and functions in substantially the same time and
10 manner as BellSouth's access; BellSouth currently does just that.

11

12 Q. Please describe BellSouth's billing interface for customer billable usage
13 data.

14

15 A. An electronic interface for customer billable usage data transfer, known
16 as the Billing Daily Usage File, is an optional interface that provides
17 ALECs with a daily file including items such as directory assistance or
18 other billable usage associated with a resold line, interim number
19 portability account, or unbundled network element such as an
20 unbundled port. The specific types of data provided include:
21 intraLATA toll, billable local calls, billable feature activations, operator
22 services, and WATS/800 service. The file provides billable call detail
23 records in a BellCore-supported, industry-standard format known as
24 Exchange Message Record (EMR) format, and is offered with several
25 methods of data delivery.

1

2 Q. Does this Commission's AT&T and MCI arbitration order require
3 BellSouth to provide such an interface?

4

5 A. Yes, and as noted by the Commission in its order, BellSouth already
6 has the capability to do so.

7

8 Q. Does the billable usage data provided through this interface provide
9 ALECs with timely and useful access to billable usage information?

10

11 A. Yes. Usage data is provided in substantially the same time frame as it
12 is available to BellSouth. In addition, for ALECs who choose the option
13 of receiving rated usage, the billable call detail records are provided in
14 a manner that adds significant value compared with the original
15 message recording BellSouth receives from its switches. BellSouth
16 performs extensive processing to add such details as the From Place,
17 To Place, jurisdiction, retail charge and other items in each call detail
18 record. Also, regardless of whether the ALEC chooses to receive
19 unrated usage or rated usage, BellSouth performs extensive edits to
20 ensure the integrity of the data. BellSouth runs its billing system five
21 work days a week. Usage processing begins each morning and the
22 billing system cycle completes the following morning with the creation
23 of actual bills. For ALECs who establish electronic data transmission
24 capability with BellSouth, the usage is then transmitted immediately.

25

SYSTEM AVAILABILITY AND ACTUAL USE

1

2

3 Q. Are BellSouth's interfaces for each required function currently available
4 for use by ALECs?

5

6 A. Yes. Exhibit GC-26 provides a summary of BellSouth's currently
7 available electronic interfaces for each function, and provides the
8 availability date for each.

9

10 Q. How long have the EXACT, EDI and LENS ordering interfaces been
11 available for use by ALECs?

12

13 A. EXACT has been available for about 12 years. The BellSouth ALEC
14 EDI interface has been available since December, 1996; EDI itself has
15 been used in commerce for about 30 years. LENS has been available
16 since April, 1997.

17

18 Q. Are any ALECs actually using these interfaces?

19

20 A. Yes. EXACT is substantially the same mechanized process that IXCs
21 have used for years to order access trunks, and as such, is a "tried and
22 true" process with which both BellSouth and many potential ALECs
23 have significant experience. ALECs currently are using EXACT to
24 process orders for local interconnection trunking and unbundled
25 network elements. AT&T has used BellSouth's EDI interface to

1 conduct testing that AT&T's local interconnection agreement with
2 BellSouth calls "Service Readiness Testing" and "Market Readiness
3 Testing". Several ALECs have been trained on LENS, and ALECs are
4 actually using LENS to conduct business with BellSouth.

5

6 Q. How long have the ALEC TAFI system and the Electronic
7 Communications Interface for Trouble Reporting been available to
8 ALECs?

9

10 A. The ALEC TAFI system was released to the ALEC community on
11 March, 1997. The electronic bonding trouble reporting interface has
12 been available since December, 1995.

13

14 Q. Are these interfaces currently in use by ALECs?

15

16 A. Yes. Two ALECs have entered trouble reports via TAFI. BellSouth
17 also has conducted TAFI training for personnel from ten other ALECs,
18 and has scheduled training for ten additional ALECs. The electronic
19 bonding trouble reporting interface is in use by two interexchange
20 carriers (IXCs) who also are ALECs. BellSouth build these systems by
21 which ALECs enter trouble reports based on the forecasts provided to
22 BellSouth by the ALECs. These forecasts indicated a much higher
23 demand than has to date been realized from the ALECs. Since BST
24 structured its capabilities to meet the forecast, there exists today a

25

1 substantial level of available capacity for additional ALEC trouble
2 reporting.

3

4 Q. Is the billing daily usage file currently available to ALECs?

5

6 A. Yes. This interface has been available to ALECs since March, 1996.
7 An AT&T-requested modification to the original design also was
8 completed in September, 1996.

9

10 Q. Are any ALECs currently obtaining billing data through this interface?

11

12 A. Yes. BellSouth has twelve ALEC customers now receiving the daily
13 usage files. Nine other ALEC customers are currently working with
14 BellSouth in preparation for receiving daily usage. There exists today a
15 substantial level of available capacity for handling additional ALEC
16 demand.

17

18 **SYSTEM TESTING**

19

20 Q. Please describe the general steps undertaken by BellSouth in testing
21 its ALEC systems.

22

23 A. As with any other software development effort, testing generally
24 consists of five steps. In generic terms, the first of these is unit testing,
25 in which small units of programming code are tested independently by

1 the software developers. For example, in LENS a small unit of code is
2 used to handle a single field, such as the street name, for the address
3 validation function. The next step is called string testing, in which the
4 smaller units of code are strung together and tested using test input
5 data in a test database with a planned set of expected results. The
6 third step is called system testing, in which units of code are tested at a
7 subsystem and then at a complete system level. For example, the
8 address validation subsystem in LENS was tested separately prior to
9 testing the complete LENS system. This step verifies that the software
10 meets the identified business requirements for the system. The fourth
11 step is interoperability testing, which tests the hardware, software and
12 network interfaces between the new system and external systems. For
13 example, this stage of LENS testing verified that the connections
14 between LENS and the pre-ordering databases were operating
15 properly. The last step is called acceptance testing, which involved
16 BellSouth personnel, other than computer professionals, testing the
17 systems to determine whether the systems met the business
18 requirements provided to the systems developers.

19

20 Q. Has BellSouth undertaken additional testing to determine the capacity
21 of its systems?

22

23 A. Yes. BellSouth has conducted volume testing, also known as load
24 testing.

25

1 Q. Based on that testing, what is the capacity of BellSouth's EDI and
2 LENS ordering systems?

3

4 A. The combined ordering capacity of these systems, including the
5 mechanized order generation capability in LESOG, has been verified
6 as being at least 5000 local service requests per day for the BellSouth
7 region, which is the capacity for which these systems initially were
8 designed. These volumes are depicted on Exhibit GC-27. **It is**
9 **important to note that local service requests do not equate to**
10 **lines, because a single service request can involve multiple lines.**

11

12 Q. On what basis were the systems sized?

13

14 A. BellSouth has sized the initial capacity on the basis of BellSouth
15 forecast information for 1997, incorporating ALEC forecast information,
16 where available. For effective system capacity management, it is
17 essential that ALECs cooperate in providing appropriate forecast
18 information that can be used to estimate their system usage.

19

20 Q. Can this capacity be readily increased should that become necessary?

21

22 A. Yes. Exhibit GC-27 also shows that the additional capacity available
23 for rapid turn-up would double the ordering capacity of these systems
24 to at least 10,000 orders per day. For LENS and LESOG, this is
25 because "hot spare" arrangements, i.e., additional processors, already

1 are in place. These protect not only against unforeseen demand
2 surges but also against equipment failure. For EDI and LEO, the
3 additional capacity is available because these systems are operating
4 on a small portion of large, well-established mainframe systems, and
5 significant excess capacity exists on both mainframes.

6

7 Q. Beyond the LENS ordering capacity, does LENS have additional
8 capacity for pre-ordering transactions?

9

10 A. Yes. LENS has been designed to support multiple pre-ordering
11 transactions for the expected 5,000 per day combined volume of LENS
12 and EDI orders.

13

14 Q. Has BellSouth discontinued its volume testing of these systems?

15

16 A. No. Having established through load testing that the systems could
17 sustain the forecasted volumes, BellSouth continues to maintain test
18 copies of the systems used for ongoing stress testing. Stress testing is
19 designed to determine the true upper limits of the systems.

20

21 Q. Has BellSouth tested its LENS and EDI systems with ALECs?

22

23 A. Yes. As each ALEC is added to LENS, BellSouth works cooperatively
24 with the ALEC in a process known as connectivity testing, which
25 ensures that the connections between BellSouth and the ALEC are

1 working properly. Also, BellSouth has engaged in extensive EDI
2 testing with AT&T.

3

4 Q. Has ALEC pre-ordering or ordering activity come close to approaching
5 the forecasted volumes?

6

7 A. No. The combined peak daily ordering volume over the EDI and LENS
8 interfaces has thus far been about 200 orders, which is significantly
9 less than the current capacity of at least 5,000 orders per day.
10 BellSouth established the required capacity for these systems based
11 on a series of discussions and negotiations with the CLECs as well as
12 on internal BellSouth forecasts, and has provide adequate capacity to
13 handle those volumes, even though the current volume of orders is not
14 even close to the forecast.

15

16 Q. What is the capacity of the ALEC TAFI system?

17

18 A. TAFI currently will support 65 simultaneous users with a volume of
19 1300 troubles handled per hour for the BellSouth region. In addition,
20 as this testimony is being filed, a second processor is being activated
21 that will double the capacity, to 130 simultaneous users and 2600
22 troubles handled per hour. A "hot spare" arrangement also is in place
23 for TAFI. This can be activated almost immediately if necessary, and
24 would increase capacity by an additional 65 users and 1300 troubles
25 per hour, for a combined total of 195 simultaneous users and 3900

1 troubles handled per hour. The spare arrangement also protects
2 against equipment failure should one of the primary processors fail.

3

4 Q. Can this capacity be readily increased if that should become
5 necessary?

6

7 A. Yes. Additional processors can be added within 60 days to continue
8 increasing capacity should that become necessary.

9

10 Q. Is the current capacity adequate to meet the needs of ALECs who have
11 indicated their intent to use TAFI?

12

13 A. Yes, it is far more than adequate, and will accommodate additional
14 potential users as well.

15

16 Q. How does this compare with the actual ALEC use of TAFI to date?

17

18 A. The current capacity of the ALEC TAFI system far exceeds the current
19 usage. Between March 28 and May 30, 1997, a total of two ALECs,
20 with one user each, had generated a combined total of 12 trouble
21 reports using TAFI. However, as the usage of TAFI currently is
22 increasing as additional ALECs are trained, I plan to provide an update
23 with the most current information available at the time of the hearings in
24 this docket. The current capacity also exceeds what is required to

25

1 support the expected number of repair reports associated with the
2 forecasted volume of ALEC lines.

3

4 Q. Has the ALEC TAFI system been tested to ensure it could handle
5 commercial volumes?

6

7 A. Yes. From March 17, 1997 until April 16, 1997, BellSouth repair
8 attendants from BellSouth's business and residence repair centers
9 used the ALEC TAFI system in a live mode to process actual trouble
10 reports from BellSouth retail customers. During that month
11 approximately 10,000 customer trouble reports were successfully
12 processed using a single ALEC TAFI processor.

13

14 Q. Has BellSouth tested TAFI with ALECs?

15

16 A. Yes. BellSouth engages in connectivity testing with each new ALEC.

17

18 Q. Has BellSouth tested its ALEC daily billable usage file?

19

20 A. Yes. In order to test both the service order process and the new
21 applications for delivery of daily usage data, BellSouth established test
22 accounts for resale in the production environment. Employee accounts
23 and certain official company lines were "transferred" to an internally-
24 defined reseller for the test. The service order flows were monitored
25 and verified for both residence and business accounts. Usage

1 associated with the test accounts was captured and flowed to the Daily
2 Usage File application to test the process. Since the end-to-end test
3 data contained limited volumes, data was also contrived to further test
4 the Daily Usage File functions prior to their deployment more than a
5 year ago.

6

7 Q. What is BellSouth's capacity to provide daily billable usage
8 information?

9

10 A. Because these files are generated through mainframe-based systems
11 with existing spare capacity, BellSouth has not identified any
12 constraints to its capacity to process daily usage files for ALECs.
13 Average daily message volumes delivered to the combined twelve
14 ALECs during April was 13,040 messages per day for the BellSouth
15 region. Total regional average daily volume for May was 22,213
16 messages per day.

17

18 Q. Has BellSouth tested its processes for providing the billing daily usage
19 file with ALECs?

20

21 A. Yes. In addition to the initial testing conducted to validate the process
22 prior to offering the service, BellSouth conducts individual tests with
23 each ALEC prior to their establishing a daily production feed.
24 BellSouth provides a comprehensive test file containing many
25 examples of record types that the ALEC may encounter in the live

1 environment. The test data is delivered in the manner specified by the
2 ALEC *i.e.*, magnetic tape or data transmission. BellSouth also
3 conducts testing in a 'live' mode if an ALEC requests it. The ALEC can
4 actually establish 'live' accounts, such as services involving the ALECs'
5 employees, or friendly users, and place calls of varying types keeping
6 manual records of each call. BellSouth delivers the associated billable
7 usage in the production mode, and the ALEC can verify that the daily
8 usage records match the test calls that were made.

9

10 Q. How will the capacity of BellSouth's ALEC interfaces be managed on a
11 going forward basis?

12

13 A. The same process of monitoring usage and making any needed
14 adjustments that is used to manage BellSouth's other computer
15 systems will be used to maintain the ALEC systems.

16

17

18 **SYSTEM TRAINING, DOCUMENTATION AND ONGOING SUPPORT**

19

20 Q. Has BellSouth provided new entrants with training and documentation
21 on its systems?

22

23 A. Yes. BellSouth has conducted ALEC training sessions that include
24 many aspects of doing business with BellSouth, including systems
25 training. BellSouth also provides appropriate system user guides and

1 other information. The most recent of BellSouth's ongoing series of
2 ALEC conferences, which also include systems demonstrations and
3 hands-on experience with the systems, was held on June 24-26, 1997.

4

5 Q. Please describe LENS training.

6

7 A. Initial LENS training was held May 13, 1997 at the BellSouth Learning
8 Center in Atlanta. Invitations were sent to all ALECs who had signed
9 interconnection agreements or were in the process of negotiating
10 agreements. During the training the ALEC representatives sat at
11 computer terminals, and the trainer guided them step by step through
12 pre-ordering inquiries and order processing. There were as many as
13 eight BellSouth staff working in the room in addition to the trainer to
14 help the ALEC representatives as they worked through the exercises.

15

16 There also is a training lab in Birmingham with a staff focused on
17 providing training, where BellSouth trains the ALECs' trainers. ALECs
18 are offered this training as part of the process of connecting them to the
19 system. During LENS training the ALECs also are provided with a
20 LENS User Guide. BellSouth also has provided technical assistance at
21 ALECs' premises.

22

23 Q. Please describe BellSouth's training and documentation on EDI.

24

25

1 A. Training on EDI is conceptually different, because of the fact that an
2 ALEC has the option of developing its own systems on its side of the
3 EDI interface. For example, BellSouth has worked extensively with
4 AT&T to develop the EDI ordering interface, and has worked
5 cooperatively with AT&T as AT&T brings its ordering processes on-line.
6 The documentation for BellSouth's EDI interface is contained in two
7 large volumes known as the Local Exchange Ordering Implementation
8 Guide that have been provided to ALECs.

9

10 Q. Has BellSouth changed the supporting documentation for its EDI
11 interface since that interface was deployed in December, 1996?

12

13 A. Yes. In an effort to accommodate the early market entry of ALECs,
14 BellSouth began its EDI implementation on the basis of the industry's
15 recommendation to use EDI, but prior to the time the industry actually
16 had undertaken its more detailed development work. As the industry's
17 standards work has progressed, BellSouth has updated its
18 implementation guides to reflect changes resulting from the standards
19 developed by the national Ordering and Billing Forum (OBF), as
20 BellSouth had indicated all along it would.

21

22 Q. Please describe TAFI training and documentation.

23

24 A. TAFI training is provided in the Birmingham training lab, where
25 BellSouth trains the ALECs' trainers. ALECs are offered this training as

1 part of the process of connecting them to the system. During this
2 training the ALECs are provided with an extensive TAFI User Guide,
3 which consists of approximately 300 pages of reference material.
4

5 Q. In a similar proceeding in another state, AT&T has suggested that
6 BellSouth's ALEC systems training is not as lengthy as the training for
7 BellSouth's customer support personnel. Is this an appropriate
8 comparison?
9

10 A. No, not at all. The scope is not intended to be the same. Therefore, it
11 is inappropriate to compare the length of BellSouth's ALEC systems
12 training with BellSouth's internal employee training. BellSouth's
13 training for service representatives and repair attendants trains new
14 employees on many aspects of BellSouth's business, not just systems.
15 ALECs are in the best position to teach their employees how the ALEC
16 chooses to do business. For example, training for new BellSouth
17 representatives may include non-system training such as customer
18 contact skills and role-playing, basic concepts of telephony, basic
19 keyboard skills, and product and service training. While not part of
20 systems training, product and service training, also is available to
21 ALECs.
22

23 Q. Does BellSouth offer "help desk" support for ALECs using its
24 interfaces?
25

1 A. Yes. A help desk is in place to handle LENS and TAFI problems. That
2 desk is staffed from 8:00 a.m. until 5:00 p.m. central time. After hours
3 assistance is available via pager access. Information on the help desk
4 is included in both the LENS and TAFI user guides. BellSouth has a
5 group known as EDI Central that handles EDI matters for BellSouth's
6 other EDI applications, such as those involving the exchange of
7 information with BellSouth suppliers. ALEC EDI problems requiring
8 BellSouth involvement also would be handled by the EDI Central
9 group.

10

11 Q. Does BellSouth provide training or other support to ALECs using the
12 interface for the billable daily usage file?

13

14 A. Yes. BellSouth has provided generic training on the daily usage file at
15 the ALEC conferences held in December, 1996 and April, 1997. The
16 Billing Administrators in the Customer Billing Services organization
17 serve as initial contacts for ALECs with questions about either their
18 monthly bills from BellSouth or the daily usage files. They involve the
19 appropriate subject matter experts needed to respond to any needs the
20 ALECs may have. Further, in preparation for establishing daily usage
21 file service for each individual ALEC, BellSouth personnel from both
22 Customer Billing Services and Information Technology routinely
23 participate in numerous meetings and conferences with the ALEC to
24 explain the service, respond to questions, review test results,
25 coordinate installation of data transmission capability if needed and

1 resolve any issues that may arise. General Daily Usage File
2 information is provided in the ALEC Daily Usage File (CDUF)
3 Requirements Document, which is provided as Exhibit A of the
4 contract ALECs sign to obtain this service.

5

6 Q. Please summarize your testimony.

7

8 A. BellSouth's interfaces should be evaluated in accordance with the
9 principle of non-discriminatory access as articulated by the FCC.
10 BellSouth's interfaces provide ALECs with access to the required
11 information and functions in substantially the same time and manner as
12 BellSouth's access for its retail customers; such access provides
13 competitively neutral outcomes in the marketplace. Therefore,
14 BellSouth respectfully asks this Commission to find that BellSouth's
15 interfaces provide non-discriminatory access to BellSouth's operational
16 support systems for the functions of pre-ordering, ordering and
17 provisioning, maintenance and repair, and billing.

18

19 Q. Does this conclude your testimony?

20

21 A. Yes.

22

23

24

25

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF GLORIA CALHOUN
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 960786-TL
5 JULY 31, 1997
6

7 Q. Please state your name, address and position with BellSouth
8 Telecommunications, Inc. ("BellSouth").
9

10 A. My name is Gloria Calhoun. My business address is 675 West
11 Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth
12 Telecommunications, Inc. as a Director of Regulatory Planning. In that
13 position I handle matters related to operations planning and
14 implementation for local interconnection, unbundling and resale.
15

16 Q. Are you the same Gloria Calhoun who previously filed testimony in this
17 docket?
18

19 A. Yes.
20

21 Q. What is the purpose of your testimony?
22

23 A. The purpose of my testimony is to refute the testimony of ICI's witness,
24 Mr. Chase, Sprint's witness Ms. Closz, MCI's witness, Mr. Martinez,
25 WorldCom's' witness, Mr. McCausland, and AT&T's witness, Mr.

1 Bradbury, regarding BellSouth's electronic interfaces for Alternative
2 Local Exchange Companies (ALECs).

3

4 Q. Generally speaking, does the testimony of these witnesses accurately
5 reflect BellSouth's recommended, available ALEC interfaces?

6

7 A. No. In many instances it appears that these intervenors are not aware
8 of the electronic interfaces BellSouth has made available for ALECs,
9 are not aware of the capabilities of those interfaces, or have chosen not
10 to take advantage of the interfaces available. The chart attached as
11 Rebuttal Exhibit GC-28 summarizes the currently available interfaces
12 for each required function. Before 1997, BellSouth did deploy some
13 interim interfaces, so that we could support the earlier market entry of
14 companies who indicated they wanted to start doing business. Some
15 ALECs have chosen to continue using those interim interfaces rather
16 than taking advantage of the electronic interfaces we have available
17 today, so BellSouth continues to make the earlier ones available.
18 Many of the intervenors describe those earlier interfaces. However, it
19 is important not to confuse what BellSouth made available early on to
20 allow ALECs to get into business as quickly as possible -- or how some
21 ALECs, for their own reasons, choose to operate -- with the best of
22 what BellSouth has to offer today.

23

24

25

1 Q. Much of the intervenors' testimony is devoted to criticizing the *ordering*
2 capabilities of BellSouth's Local Exchange Navigation System (LENS).
3 Is ordering the primary function of LENS?
4

5 A. No, the industry standard for ALEC ordering is EDI, and BellSouth's
6 EDI interface provides the ordering capabilities many intervenors,
7 particularly Mr. Bradbury, cite as lacking in LENS. BellSouth, along
8 with the industry, recommends EDI for ordering. BellSouth originally
9 intended LENS as a pre-ordering tool, and makes a range of
10 connection options available that support both large and small ALECs
11 for that purpose. BellSouth also developed interactive ordering
12 capabilities as an option through LENS, and over time, we expect the
13 LENS ordering functions to mirror the capabilities already available
14 through EDI. Currently, however, the primary function of the LENS
15 interface is for obtaining real-time, interactive access to pre-ordering
16 information, which is substantially the same time and manner as
17 BellSouth's access for its retail operations. The fact that LENS for
18 *ordering* does not yet provide all the capabilities available through the
19 industry standard EDI ordering interface does not detract from the *pre-*
20 *ordering* capabilities available through LENS.
21

22 Q. Is EDI a viable option for smaller ALECs?
23

24 A. Yes. In addition to working with large carriers such as AT&T who want
25 to customize EDI, BellSouth also worked with a third party software

1 vendor to develop a personal computer-based EDI software package,
2 known as EDI-PC. EDI-PC is compatible with BellSouth's EDI
3 interface, and is readily available to even the smallest ALEC that might
4 not want to develop its own system. Examples of screens from the
5 EDI-PC package were included with my direct testimony as Exhibit GC-
6 17.

7

8 **Rebuttal of J. Lans Chase's Testimony- ICI**

9

10 Q. Has ICI implemented BellSouth's currently available options for
11 electronic ordering and provisioning, such as the industry-standard
12 electronic data interchange (EDI) interface?

13

14 A. No. According to Mr. Chase's testimony, ICI is placing most of its
15 orders manually by facsimile machine and a few by LENS. The fact
16 that ICI has chosen, for its own reasons, not to avail itself fully of
17 BellSouth's electronic ordering capabilities is not a deficiency on the
18 part of BellSouth.

19

20 Q. Mr. Chase's direct testimony, at pages 3-5, describes ICI's
21 dissatisfaction with BellSouth's handling of ICI's ordering and
22 provisioning information. Does the process Mr. Chase describes reflect
23 BellSouth's available electronic ordering and provisioning interfaces?

24

25

1 A. No. The problems enumerated by ICI would be obviated by the use of
2 BellSouth's recommended ordering and provisioning interface, EDI.
3 EDI electronically accepts orders, and electronically provides order
4 acknowledgments, firm order confirmations, and completion
5 notifications.

6

7 Q. How long has the EDI interface been available to ICI and other ALECs?

8

9 A. BellSouth's EDI interface has been available since December, 1996.
10 The EDI-PC software has been available since March 31, 1997. This
11 enables any ALEC to use the commercially available EDI software
12 package developed by a third party vendor following BellSouth's
13 specifications.

14

15 Q. Mr. Chase complains, on pages 20-21, that when using LENS for
16 ordering "switch-with-changes" service where the only change is long
17 distance service, ICI must recreate each telephone number with all
18 feature codes and then designate a long distance PIC. Is this a
19 BellSouth requirement?

20

21 A. No. This ordering requirement was developed by the industry's
22 national Ordering and Billing Forum, and BellSouth complies with the
23 industry's standard.

24

25

1 Q. According to Mr. Chase (pages 21-22), LENS does not automatically
2 send the FOC (Firm Order Confirmation) for orders placed through
3 LENS. Do you agree?
4

5 A. No. An ALEC can view at will firm order confirmations for orders
6 placed through LENS.
7

8 Q. Mr. Chase complains, at page 22, that LENS does not automatically
9 provide Customer Service Records (CSRs). Please comment.
10

11 A. As described in my direct testimony, on-line access to customer service
12 record information is available through LENS. These records may be
13 accessed and printed by ALECs as needed. Examples of customer
14 service record screens seen by ALECs using LENS were attached to
15 my direct testimony as Exhibit GC-15.
16

17 Q. On pages 20-22, Mr. Chase complains that LENS does not support all
18 service orders. Does the industry-standard EDI ordering interface
19 support the order types identified by Mr. Chase?
20

21 A. Yes. These types of orders are available through EDI, BellSouth's
22 industry-standard ordering interface. While LENS currently supports
23 many of the most common types of orders and its ordering capabilities
24 will expand in the future; the primary purpose of LENS is for pre-
25 ordering.

1

2 **Rebuttal of Robert W. McCausland's Testimony - Worldcom, Inc.**

3

4 Q. Mr. McCausland asserts that LENS cannot be used to order unbundled
5 network elements and interim number portability. Do you agree?

6

7 A. No. Mr. McCausland appears to base this assertion on an e-mail
8 message that, by my reading, does not address unbundled network
9 elements one way or the other. "Complex services" refers to complex
10 resold services, and is not synonymous with unbundled network
11 elements. The primary ordering interface for loops, ports, and interim
12 number portability is EDI. In addition, BellSouth will accept orders for
13 these services through LENS. Additional unbundled network elements
14 (UNEs) can be ordered through Exchange Access Control and
15 Tracking (EXACT).

16

17 Q. Mr. McCausland claims, at page 22, that the EDI interface will not meet
18 WorldCom's needs because "it is not mechanized." Is this accurate?

19

20 A. On the contrary, EDI is the mechanized ordering interface
21 recommended by the industry for ALEC ordering. In addition, as
22 described in my direct testimony, BellSouth has implemented
23 mechanized order creation capabilities on BellSouth's side of the EDI
24 interface. Mr. McCausland provides no support for this contention; it
25 appears he is simply mistaken.

1

2 **Rebuttal of Melissa Closz's Testimony - Sprint**

3

4 Q. On page 9 of her direct testimony, Ms. Closz asserts that BellSouth's
5 Operational Support System (OSS) interfaces have not met the
6 standard of nondiscriminatory access because the interfaces
7 introduced by BellSouth to date are not fully deployed and tested, and
8 that the proposed OSS interfaces are only interim solutions. Do you
9 agree?

10

11 A. No. Contrary to Ms. Closz's assertions, BellSouth's interfaces have
12 been fully tested and have been deployed in a "real world"
13 environment. I described BellSouth's testing methods in detail in my
14 direct testimony. These interfaces are available to and in use by
15 ALECs in BellSouth's region. While these are not intended as interim
16 solutions, the interfaces will, of course, continue to evolve, just as
17 BellSouth's retail systems do. For example, the Regional Negotiation
18 System (RNS) used by BellSouth's retail service representatives has
19 been in use for several years, but changes still are introduced in
20 monthly software releases. An expectation of an unchanging or
21 "permanent" interface is unrealistic, particularly in view of the fact that
22 ALECs themselves request changes and enhancements.

23

24 Q. Ms. Closz claims, on pages 16 and 17 of her direct testimony, that
25 Electronic Data Interchange (EDI) is not an industry standard interface,

1 and that an EDI ordering interface will not support the interaction of an
2 ALEC's OSS with BellSouth's OSS. Is either point correct?

3

4 A. No, not at all. EDI was adopted by the industry for ALEC order
5 communications in 1996, and is recognized in the testimony of other
6 intervenors' witnesses as the industry standard. Also, the very nature
7 of EDI is to exchange information between independent computer
8 systems on either side of the interface. In other words, EDI supports
9 the system interaction described by Ms. Closz.

10

11 Q. Ms. Closz, at page 10 of her testimony, states that ALECs are able only
12 to print one screen of CSR information at a time while BellSouth's
13 representatives are able to print multiple pages on command. Is this
14 accurate?

15

16 A. No. ALECs are able to print up to 50 pages with a single command.
17 BellSouth's retail service representatives obtain 50 pages at a time as
18 well.

19

20 Q. Ms. Closz further states that LENS only allows ALECs to view the first
21 50 pages of a customer's record and that a phone call to the LCSC is
22 required to obtain the additional pages. Please comment.

23

24 A. Currently, only the first 50 pages of a customer's records are available
25 via LENS. While BellSouth is working to expand the view capabilities

1 for large records, the current view capabilities need not adversely affect
2 the ALECs' ability to provide customer service. Customers with CSRs
3 greater than 50 pages typically are the complex customers for which
4 BellSouth uses many manual processes, and order negotiations with
5 these customers typically occurs over multiple customer contacts.

6

7 Q. On page 13, Ms. Cloz criticizes BellSouth's Trouble Analysis
8 Facilitation Interface (TAFI) interface for trouble reporting. Are her
9 comments correct?

10

11 A. No. First, her statement that TAFI is limited to resale services is
12 incorrect. Ms. Cloz's description of how unbundled network elements
13 such as unbundled ports or interim number portability are handled with
14 TAFI is inaccurate. TAFI is the "appropriate" system for any telephone-
15 number based service, whether resale or unbundled network element.
16 TAFI is a real-time, interactive interface, which automatically interacts
17 with the appropriate BellSouth system for the situation, and which often
18 enables the ALEC or BellSouth repair attendant to clear trouble reports
19 remotely. While Ms. Cloz complains that TAFI does not support
20 "circuits", TAFI does not support circuits for BellSouth's retail
21 operations, either. There is, however, a separate, industry standard
22 trouble reporting interface currently available for designed services
23 identified by circuit numbers. That interface also was described in my
24 direct testimony as the Electronic Bonding Trouble Reporting interface.

25

1 Q. On pages 14 and 15 of her testimony, Ms. Cloz describes the
2 methods by which Sprint places orders in Florida, then states, at line 20
3 on page 14, that "there is no way to electronically coordinate the receipt
4 of these orders by BellSouth." Is this correct?

5

6 A. No. While Sprint apparently has *chosen* to use a combination of
7 facsimile and the electronic EXACT system for placing various related
8 orders, BellSouth does not require this method. All the order types Ms.
9 Cloz describes -- unbundled loop, local number portability and
10 directory listing -- can be ordered electronically through a single,
11 industry standard EDI ordering interface. The fact that Sprint chooses
12 to do business in another manner is not a failure on the part of
13 BellSouth.

14

15 **Rebuttal of Jay Bradbury's Testimony - AT&T**

16

17 Q. Mr. Bradbury devotes more than half his testimony to LENS, and in
18 particular, to the ordering capabilities in LENS. In light of what AT&T
19 has asked BellSouth to undertake on the EDI ordering interface, do you
20 find this puzzling?

21

22 A. Yes. For more than a year, AT&T has worked with BellSouth to
23 develop the EDI ordering interface that is the industry's recommended
24 interface for ALEC ordering. Since early this year, AT&T has
25 conducted Service Readiness Testing and Market Readiness Testing,

1 which are described in its interconnection agreement, using the EDI
2 ordering interface. The LENS interface provides an ordering option for
3 ALECs who choose not to implement the industry standard EDI
4 ordering interface, but the primary purpose of LENS is for pre-ordering.
5 Nearly all of Mr. Bradbury's complaints about LENS relate not to pre-
6 ordering but to the ordering capabilities in LENS.

7

8 Q. Mr. Bradbury introduces decisions from state commissions outside the
9 BellSouth region about a supposedly-similar interface provided by U.S.
10 West. Has AT&T provided any information to support its contention
11 that BellSouth's LENS pre-ordering interface and U.S. West's interface
12 are technically alike?

13

14 A. No. Other than AT&T's assertion that U. S. West's and BellSouth's
15 interfaces are both "web-based," AT&T provides no facts to indicate
16 that the interfaces are technically alike. Based on my review, none of
17 the state commission orders cited by AT&T contain any information
18 indicating that the U.S. West interface is comparable to BellSouth's
19 LENS interface.

20

21 Q. Please comment on Mr. Bradbury's discussion, at page 23 of his
22 testimony, in which he disagrees with your direct testimony that
23 electronic bonding is not a requirement for non-discriminatory access,
24 and that manual handling for complex services, as long as the

25

1 processes are comparable for both BellSouth and ALECs, can provide
2 non-discriminatory access.

3

4 A. In a similar proceeding in Louisiana in May, 1997, Mr. Bradbury agreed
5 that it is not necessary to eliminate all manual intervention in order for
6 an interface to meet the non-discriminatory access requirement.
7 (Louisiana Public Service Commission, Docket No. U-22252, May 28,
8 1997, Hearing Volume Number 7, Page 1782.) As described in my
9 direct testimony, manual intervention is involved in certain of the
10 processes which BellSouth uses to provide certain services to its retail
11 customers. Thus, non-discriminatory access to such functions for
12 ALECs can involve manual processes also.

13

14 Q. Mr. Bradbury's Exhibit JB-1 (referred to on page 29 of his testimony)
15 lists "Market Entry Interfaces" with BellSouth. Are these interfaces the
16 best of what BellSouth offers ALECs today?

17

18 A. No. These interfaces simply represent how AT&T has chosen to do
19 business with BellSouth for AT&T's market entry. For example, for pre-
20 ordering, AT&T chose a combination of on-line, file transfer and manual
21 processes for the various pre-ordering functions, yet AT&T could have
22 chosen real-time, interactive access for these functions through LENS,
23 and Mr. Bradbury recently testified in a similar proceeding in Georgia
24 that AT&T is in the process of training several hundred AT&T
25 employees on the use of LENS for pre-ordering. Likewise, Mr.

1 Bradbury's chart shows that AT&T has chosen a manual interface for
2 maintenance and repair, but AT&T could have chosen to use the
3 interactive, real-time TAFI system BellSouth uses for its retail
4 operations.

5

6 Q. On pages 32-33 of his direct testimony, Mr. Bradbury states that
7 because LENS does not allow BellSouth's and an ALEC's OSS to
8 interact electronically, the ALEC's service representative must manually
9 input data into BellSouth's OSS, then re-enter that same data into its
10 OSS. Please comment on that statement.

11

12 A. There is no need for an ALEC to manually re-enter data obtained from
13 LENS into the ALECs' operational support systems as described in my
14 direct testimony. There are several methods, ranging from simple to
15 more sophisticated, that obviate the need to re-enter data. An ALEC
16 using LENS can simply "cut and paste" information from LENS into any
17 other computer application that supports "cut and paste," such as
18 Microsoft Windows. Another method makes available the data
19 underlying the presentation screens supplied through LENS for
20 customization by an ALEC's software developers, as shown on
21 ~~7-⁷ Rebuttal~~ Exhibit GC-1 filed with Direct testimony. The data also can be provided in additional formats
22 independently of the LENS presentation screens, through a process
23 known as Common Gateway Interface, or CGI. CGI is described in my
24 direct testimony at pages 11-12.

25

1 Q. At page 38 of his direct testimony Mr. Bradbury suggests that BellSouth
2 has not cooperated with AT&T on the CGI process that would allow
3 AT&T to integrate LENS data with AT&T's OSS. Do you agree?
4

5 A. No. BellSouth has made efforts over a number of months to
6 accommodate AT&T, and in fact, is developing an electronic bonding
7 pre-ordering interface designed to AT&T's specifications under the
8 terms of the interconnection agreement. In addition to that effort,
9 BellSouth has made several proposals to AT&T regarding methods for
10 integrating AT&T's OSS with LENS. Mr. Bradbury on page 38, line 15
11 complains that AT&T received a March 20, 1997 specification that later
12 was withdrawn. What Mr. Bradbury does not say is that BellSouth, in
13 March, 1997, had told AT&T that the CGI specification in question was
14 not ready to be released, and would be available April 30, 1997. The
15 specification at AT&T's insistence was released to AT&T for review on
16 March 20, 1997, before the BellSouth technical developers considered
17 it complete, ^{and} AT&T was aware of this. On April 8, 1997, BellSouth did
18 retract the document for technical reasons. BellSouth then
19 discontinued its work on the specification, given that at that time AT&T
20 indicated it did not plan to proceed, and that there was no other ALEC
21 expressing an interest in the development. Nonetheless, BellSouth is
22 willing to continue development of this approach with any interested
23 ALEC.
24

25 Q. Is LENS a stable system?

1

2 A. Yes. LENS was designed as a highly reliable system and has
3 continued to perform reliably in actual use. In contending that LENS is
4 an "unstable" system (page 40 of his direct testimony), Mr. Bradbury
5 refers to correspondence from the LENS project manager. However,
6 that correspondence was a response to a request from AT&T for
7 information about whether and how frequently there would be
8 enhancements to LENS. That May 19 correspondence indicates that
9 with the exception of a few changes, some of which already have been
10 made, "the pre-order capabilities are stable." While the letter indicated
11 that changes would occur in the ordering functions over the next six to
12 nine months, for its primary purpose of pre-ordering, LENS is stable.

13

14 Q. Beginning on page 40, Mr. Bradbury provides a lengthy chronology
15 regarding the process for obtaining AT&T's LENS user set-up. Is the
16 process described by Mr. Bradbury typical?

17

18 A. No. This particular chronology appears to have resulted from a
19 combination of miscommunication on the part of both BellSouth and
20 AT&T, and does not reflect BellSouth's typical experience with other
21 ALECs. The total time averages about two weeks, as AT&T was
22 advised in the May 7, 1997 entry in its chronology. However, where
23 the ALEC has already obtained an appropriate network connection and
24 requires password access only, that process has been accomplished in
25 as little as 48 hours.

1

2 Q. Mr. Bradbury, at page 52 of his direct testimony, states that in its
3 Inquiry Mode, LENS requires new entrants to validate addresses
4 repeatedly in order to perform various pre-ordering functions. Do you
5 agree?

6

7 A. The ALEC will need to validate the address only for the functions that
8 rely on address information. For example, to determine available
9 telephone numbers or available features, the system must be able to
10 associate an address with a particular central office. However, this
11 association can be made simply by entering an existing telephone
12 number.

13

14 Q. On pages 52-53, Mr. Bradbury states that LENS does not display the
15 same type of information that is available to BellSouth's services
16 representatives, such as driving instructions. What is the application of
17 driving instructions in today's world?

18

19 A. Driving instructions come into play only where an address is
20 unnumbered, a situation which currently is rare and continues to
21 decline. With the proliferation of 911 services, local authorities have in
22 recent years worked diligently to number all addresses, and most local
23 authorities do not permit BellSouth to install new telephone service at
24 an unnumbered address, nor to assign house numbers, but require the
25 customer to obtain a numbered address first from the local authority.

- 1
- 2 Q. Mr. Bradbury states, at page 53 of his direct testimony, that "LENS is
3 unable to perform certain telephone number searches as advertised."
4 Please comment.
- 5
- 6 A. Telephone numbers are not always available that match selected
7 criteria. This is not a LENS limitation, and the same is true for special
8 number searches for BellSouth's retail customers. LENS allows an
9 ALEC to customize a telephone number search, but, just as for
10 BellSouth's retail customers, there is never a guarantee that the
11 telephone number database will have a number available matching the
12 criteria selected. LENS will display *available* telephone numbers that
13 match the requested criteria.
- 14
- 15 Q. According to Mr. Bradbury, at page 53, LENS does not allow new
16 entrants to select the options of RingMaster®, hunting and specific
17 NXX, but he states that BellSouth service representatives have those
18 capabilities when selecting telephone numbers. Please respond.
- 19
- 20 A. RingMaster® is available to ALECs through the product and service
21 feature of LENS. Specific NXX is available to ALECs via the telephone
22 number search capabilities of LENS. Hunting is accomplished by an
23 ordering code placed on a service order, not as part of telephone
24 number selection for BellSouth retail orders.
- 25

1 Q. Mr. Bradbury complains, at page 56 of his testimony, about the manner
2 in which LENS presents the list of available interexchange carriers.

3 Please comment.

4

5 A. Mr. Bradbury is complaining about the random order in which the list of
6 carriers is presented, and the fact that an ALEC might have to scroll
7 through several screens to find a carrier serving that customer's
8 location. BellSouth's databases are designed to comply with the
9 regulatory requirement that lists of available carriers be presented in
10 random order. In addition, unless AT&T plans to presubscribe its local
11 customers' long distance service to carriers other than itself, it is
12 difficult to imagine how AT&T feels disadvantaged by this arrangement.
13 On the other hand, one of AT&T's suggested remedies, an alphabetical
14 listing of available carriers, could produce an advantage for AT&T.

15

16 Q. Mr. Bradbury, at page 75, suggests that BellSouth's EDI ordering
17 interface is deficient in that it does not support complex services of any
18 sort. Do you agree?

19

20 A. No. As indicated in my direct testimony, EDI supports "complex
21 business" services such as PBX trunks, SynchroNet® service (a private
22 line service), hunting, and basic rate ISDN service. However, as can
23 be noted from the discussion earlier in this testimony about manual
24 handling of many complex services, it is clear that BellSouth does not
25 use mechanized ordering for all of its retail services. Complex services

1 requiring account team handling are therefore not currently supported
2 by EDI, but given BellSouth's manual handling of those services for its
3 retail customers, that is not discriminatory.

4

5 Q. Does the "batch" nature of the EDI interface mean that an ALEC's
6 orders will be delayed, as described by Mr. Bradbury on pages 75-76?

7

8 A. No. Batch times can be adjusted to accommodate the needs of
9 ALECs. While the EDI batches currently are set up to run every 30
10 minutes, they can be adjusted to short intervals to accommodate
11 specific market needs. Also, the EDI-PC package allows orders to be
12 transmitted immediately.

13

14 Q. Mr. Bradbury asserts, on page 87, that BellSouth is able to submit
15 orders and obtain status reports for all its trouble reports, while TAFI for
16 ALECs only supports basic local exchange services. Is this correct?

17

18 A. No. TAFI is used by BellSouth and ALECs to handle trouble reports for
19 both business and residence basic local exchange services, including a
20 range of features and functions associated with such basic exchange
21 services. Contrary to Mr. Bradbury's statements, an ALEC may use
22 TAFI to input trouble reports, obtain commitment times, and check the
23 status of reports for complex services, such as MultiServ® service or
24 PBX trunks. An ALEC may also use TAFI to report troubles associated
25 with unbundled network elements that are identified by a telephone

1 number, such as unbundled ports or interim number portability. For
2 "designed" or "special" services, principally those identified with a circuit
3 rather than a telephone number, ALECs can report trouble using the
4 same electronic bonding interface used by interexchange carriers for
5 access service.

6

7 Q. Mr. Bradbury also suggests, on pages 87-88, that the capacity of TAFI
8 is inadequate because it is smaller than AT&T's total number of repair
9 attendants. Do you agree?

10

11 A. No. BellSouth has received no indication that AT&T plans to use TAFI,
12 and Mr. Bradbury recently testified in Georgia that AT&T does not plan
13 to use TAFI at all. In any event, with the cooperation of any ALEC,
14 TAFI can be sized to accommodate any number of ALEC users, just as
15 it is for BellSouth's retail repair attendants. In the meanwhile, the
16 ALEC TAFI system has far more capacity today than is needed to
17 support either current or forecasted TAFI users. As of late July, TAFI
18 supports 130 simultaneous users with a volume of 2600 troubles
19 handled per hour for the BellSouth region. A "hot spare" processor
20 also is in place for TAFI. This can be activated almost immediately if
21 necessary, and would increase capacity by an additional 65 users and
22 1300 troubles per hour, for a combined total of 195 simultaneous users
23 and 3900 troubles handled per hour.

24

25

1 Q. Is BellSouth building an additional trouble reporting interface at AT&T's
2 request?

3

4 A. Yes. At AT&T's request, BellSouth has agreed to develop a local
5 exchange trouble reporting system similar to the existing interexchange
6 carrier gateway, known as the Electronic Communications Gateway.

7 This is scheduled for delivery in December, 1997, and will also be
8 available to any other requesting ALEC.

9

10 **Rebuttal of Mr. Martinez' Testimony**

11

12 Q. How will your rebuttal of Mr. Martinez' testimony be organized?

13

14 A. MCI's witness Mr. Martinez begins by addressing some "background"
15 themes, and then addresses BellSouth's systems for each function. I
16 will organize my rebuttal to his testimony along these lines.

17

18 **Rebuttal of Mr. Martinez' Background Themes**

19

20 Q. Mr. Martinez, at page 6 of his direct testimony, draws a distinction
21 between automated electronic interactive access, which he
22 characterizes as "modern", and manual access, which he characterizes
23 as "primitive." Do you agree with this distinction?

24

25

1 A. No, this is an oversimplification, and also is largely irrelevant. The
2 relevant question from the perspective of non-discriminatory access is
3 not whether processes are "modern" or even mechanized, but whether
4 they provide access to information and functions in substantially the
5 same time and manner as BellSouth's access for its retail customers.
6 BellSouth relies on many manual processes itself when providing
7 complex retail services, and has those same processes available for
8 complex resale services, as described in my direct testimony.
9 Complex, variable processes are relatively difficult to mechanize, and
10 BellSouth has concluded that mechanizing many lower-volume
11 complex retail services for its retail operations would be imprudent, in
12 that the benefits of mechanization would not justify the cost. However,
13 If MCI or any other ALEC, in exercising its independent business
14 judgment, were to reach a different conclusion, it could certainly fund
15 the cost of complex service mechanization through a bona fide request
16 for additional functionality. The statement by Mr. Martinez, at page 10
17 of his direct testimony, that "manual intervention on the ILEC's side
18 cannot be acceptable in either the short or long term" misses the mark.
19 The requirement is not total mechanization; the requirement is non-
20 discriminatory access.

21
22 Q. At line 15, page 3 of his direct testimony, Mr. Martinez states that
23 BellSouth "has immediate real-time access to all information necessary
24 to respond fully and correctly to customer queries . . ." (emphasis
25 added). Do you agree?

- 1
- 2 A. No. There are many situations in which BellSouth service
3 representatives must obtain information manually in the normal course
4 of business.
- 5
- 6 Q. Mr. Martinez implies, at page 8 and elsewhere in his direct testimony,
7 that "electronic bonding" is necessary for real-time access to pre-
8 ordering information. Do you agree?
- 9
- 10 A. No, not at all. BellSouth's pre-ordering interface, the Local Exchange
11 Navigation System (LENS), provides ALECs with real-time interactive
12 access to BellSouth's pre-ordering information, regardless of whether
13 LENS meets MCI's definition of electronic bonding. This was depicted
14 on Exhibit GC-2 filed with my direct testimony. Thus, there is no merit
15 to Mr. Martinez' further claim, at page 35, line 10 of his direct testimony,
16 that a system such as LENS is time-consuming for customers waiting
17 on the phone, nor for his claim, at page 25, line 13, that LENS is a
18 manual dedicated access system that is incapable of integrating with
19 an ALEC's OSS. From the customer's perspective, pre-ordering
20 interactions with an ALEC using LENS are indistinguishable from pre-
21 ordering interactions with BellSouth, regardless of whether LENS
22 meets MCI's definition of electronic bonding.
- 23
- 24 Q. Would electronic bonding arrangements meet the needs of all market
25 entrants?

1

2 A. No. Electronic bonding arrangements, because of the "sophistication"
3 described by Mr. Martinez, are difficult, expensive and time-consuming
4 to implement, and, as experience in the access world has shown, are
5 of interest to only the very largest potential ALECs. While BellSouth
6 has committed through its interconnection agreements to implement
7 additional electronic bonding arrangements for pre-ordering
8 information, BellSouth nonetheless has developed the LENS pre-
9 ordering interface for the entire ALEC industry. LENS provides real-
10 time, interactive access to pre-ordering information, and is available to
11 support any ALEC that chooses to enter the local market today.

12

13 Q. In his discussion of industry standard interfaces, Mr. Martinez, at line
14 21, page 10 of his direct testimony, states that BellSouth uses
15 essentially the same OSS interfaces and formats throughout its region.
16 Is this accurate?

17

18 A. No, Mr. Martinez is quite mistaken. As described in my direct
19 testimony, for its retail pre-ordering transactions BellSouth uses
20 different systems, depending on whether the customer is a residence
21 or business subscriber, and based on the customer's location.
22 BellSouth uses the Regional Negotiation System (RNS) for most types
23 of residence orders. For business customers in Alabama, Kentucky,
24 Louisiana, Mississippi and Tennessee, BellSouth uses the Service
25 Order Negotiation System (SONGS); for business customers in Florida,

1 Georgia, North Carolina and South Carolina, the Direct Order Entry
2 (DOE) system is used. SONGS and DOE also are used by service
3 representatives for residence customer transactions not supported by
4 RNS. These systems also vary considerably in their formats and ease
5 of use, as was shown in many of the exhibits attached to my direct
6 testimony. For example, RNS is a newer system that provides more
7 English-language and point-and-click capabilities. SONGS and DOE
8 are older systems that are less user friendly, relying more on the use of
9 special codes and function keys. LENS, however, is superior to the
10 BellSouth systems in that it provides a single interface for both
11 residence and business, and supports all states in the BellSouth
12 region.

13
14 Q. Is Mr. Martinez' testimony consistent on the subject of industry
15 standard interfaces?

16
17 A. No. Mr. Martinez admits, on page 12 of his direct testimony, that the
18 industry has not yet developed standards for the "information
19 exchanges that typically occur before an ALEC actually places an order
20 with an ILEC" (i.e., pre-ordering information). Nevertheless, at page 25
21 and again at page 26 of his direct testimony, Mr. Martinez criticizes
22 BellSouth's pre-ordering interface, LENS, as not being an industry
23 standard interface. In the absence of industry standards for pre-
24 ordering, BellSouth has developed LENS. The only current alternatives
25 to LENS are either another non-standard pre-ordering interface, such

1 as the customized interface being developed for AT&T, or no pre-
2 ordering interface at all. Having no pre-ordering interface is hardly the
3 outcome contemplated by the FCC order, or by this Commission's
4 *resale and arbitration decisions*.

5

6 Q. Are there further inconsistencies in Mr. Martinez' testimony on industry
7 standards?

8

9 A. Yes. For example, at page 14 of his direct testimony, Mr. Martinez
10 indicates that a satisfactory interface requires that "[w]herever there
11 exists an industry standard, the BOC must have adopted and
12 implemented it". However, at page 44 of his direct testimony, Mr.
13 Martinez suggests that the industry is considering adopting an EDI
14 standard for pre-ordering transactions; Mr. Martinez then suggests that
15 if BellSouth were to implement an EDI interface for pre-ordering
16 transactions, as BellSouth plans to do given the industry's current
17 direction, the interface would still be lacking because EDI is a "batch"
18 interface.

19

20 Q. Mr. Martinez states, on pages 12 and 13 of his direct testimony, that in
21 the absence of industry standards, the incumbent should adopt the
22 "least costly interim solution that would give requesting carriers the
23 same level of access to the BOC's OSS functions as the BOC itself
24 enjoys." Is the development of LENS consistent with that view?

25

1 A. Yes. While I know of no requirement in either the Telecommunications
2 Act or the FCC's implementing orders that an incumbent adopt the
3 least costly interface, LENS nonetheless is consistent with that view.
4 LENS is compatible with inexpensive, commercially available hardware
5 and software, requires no additional development effort by the ALEC,
6 but also can be adapted by the ALEC with as much customization as
7 the ALEC is willing to undertake. Also, LENS provides ALECs with
8 access to BellSouth's pre-ordering information in substantially the same
9 time and manner as BellSouth's access for its retail customers.

10

11 Q. Mr. Martinez also criticizes BellSouth's local exchange trouble reporting
12 interface, TAFI, as not conforming with industry standards. What is
13 your response?

14

15 A. The TAFI functionality described in my direct testimony is far superior
16 to the limited functionality supported by the industry standard for
17 trouble reporting, and BellSouth offers ALECs full TAFI functionality.
18 TAFI allows a repair attendant to actually clear many trouble reports
19 with the customer on the line, while the industry standard merely
20 addresses functions such as electronically opening a trouble ticket or
21 obtaining status information. While there is no industry standard for the
22 superior functionality provided by the TAFI interface, it nonetheless
23 allows ALECs to handle local exchange trouble reports in substantially
24 the same time and manner as BellSouth does for its retail customers;

25

1 an interface that merely conformed with industry standards would be
2 inferior.

3

4 Q. Mr. Martinez concludes his discussion of industry standards by stating,
5 at page 14 of his direct testimony , that “a BOC’s OSS interfaces
6 should be deemed satisfactory” only if several conditions he lists are
7 satisfied. Are you aware of any authority in either the
8 Telecommunications Act or the FCC’s implementing orders to support
9 MCI’s list of conditions that industry standard interfaces must be
10 implemented or contractually agreed upon, or that non-standard
11 interfaces must conform with “expected” industry standards.

12

13 A. No. The relevant question with regard to non-discriminatory access is
14 not whether BellSouth’s interfaces comply with industry standards that
15 in some cases are still undefined, or whether BellSouth meets other
16 aspects of MCI’s wish list, but whether both ALECs and BellSouth have
17 access to the information and the functionality in BellSouth’s
18 operational support systems in substantially the same time and
19 manner. BellSouth’s interfaces meet this requirement.

20

21 Q. At pages 20 and 21 of his direct testimony, Mr. Martinez describes the
22 process of deploying “operationally ready” electronic interfaces as
23 “substantial” and “time-consuming.” How does this description
24 compare with Mr. Martinez’ testimony during the arbitration
25 proceedings?

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A. At page seven of the direct testimony of Terry Farmer of MCI, adopted by Mr. Martinez, and filed in Docket No. 960846-TP on August 22, 1996, MCI contended that "full implementation [of the electronic interfaces]. . . must be achieved . . . before the Section 271 checklist can be met" but that "[t]his need not create a problem of timing . . . since . . . the FCC has ordered the ILECs to comply with its access requirements by January 1, 1997." It is curious that in August, 1996, MCI believed that full implementation of electronic interfaces could be accomplished in about four months, but, now that BellSouth has implemented its interfaces, MCI objects to finding that BellSouth has met the checklist by characterizing the full implementation process as "substantial" and "time-consuming".

Q. Mr. Martinez also cites at page 19 the need for "integration" testing, which he describes as "full end-to-end trials designed to make sure that [BellSouth's and MCI's] systems can communicate properly with each other to accomplish the intended results in the designed manner." Does BellSouth control MCI's EDI testing schedule?

A. No. BellSouth is engaged in EDI implementation discussions with MCI, but whether and when MCI participates in such testing is under MCI's control. BellSouth, nonetheless, has demonstrated through volume testing that its interfaces are capable of supporting the forecasted

1 volume of commercial transactions, as described in my direct
2 testimony.

3

4 Q. At page 13 of his direct testimony, Mr. Martinez states, "Quite often, a
5 BOC will restrict . . . data from their Business Office Representative",
6 and uses an example of vanity numbers. Does BellSouth restrict its
7 business office personnel from accessing vanity numbers?

8

9 A. No. Mr. Martinez's discussion bears no relationship to BellSouth's
10 telephone number management practices, and in fact, Mr. Martinez
11 recently testified in Georgia that he based this contention on his
12 experience at Southern New England Telephone Company during the
13 1970s. Meanwhile, LENS provides ALECs the ability to access all
14 available numbers, vanity or otherwise, in substantially the same time
15 and manner as BellSouth's access for its retail customers, i.e., through
16 real-time, interactive access to the database containing those numbers.
17 Mr. Martinez' description of what another BOC might have done is
18 irrelevant to the issues before this Commission.

19

20 **Rebuttal of Mr. Martinez' BellSouth-Specific Criticisms**

21

22 Q. Mr. Martinez states, at pages 23 and 24 of his direct testimony, that
23 "BellSouth's interfaces do not support many of the pre-ordering
24 requirements, especially the sub-functions supplying the real-time
25 information that ALECs will need . . .". Is this correct?

1

2 A. No. As described in detail in my direct testimony, ALECs using LENS
3 have real-time access to pre-ordering information. It is not clear why
4 MCI would believe otherwise, as MCI personnel have attended both
5 LENS training and ALEC conferences at which the LENS capability
6 was demonstrated, and MCI has obtained a LENS user ID that
7 provides access to the LENS system.

8

9 Q. Mr. Martinez states, at page 25 of his direct testimony, that LENS is
10 "incapable" of integrating with an ALEC's OSS system. Do you agree?

11

12 A. No. As stated earlier, there are several methods through which an
13 ALEC can accomplish this integration. BellSouth's CGI specification for
14 this purpose has been provided to MCI. Therefore, Mr. Martinez is
15 incorrect in stating, at page 35, line 6 of his direct testimony, that
16 "utilizing LENS . . . the ALEC customer service representative would
17 have to visually read information from the BellSouth database,
18 manually input the information into the ALEC's internal order entry
19 system."

20

21 Q. Mr. Martinez complains, at page 25 of his direct testimony, that the
22 LCSC is the back up for LENS, and that the LCSC is only open
23 Monday through Friday from 8:00 a.m. to 5:00 p.m. central standard
24 time. Is this accurate?

25

1 A. No. The LCSC is open 24 hours per day, seven days per week. Thus,
2 MCI has the customer service it requires, and Mr. Martinez' complaint
3 is without merit.

4

5 Q. Does the description of the telephone number assignment capabilities
6 in LENS given by Mr. Martinez at pages 29-31 of his direct testimony
7 accurately describe the actual capabilities of either LENS or BellSouth's
8 retail number assignment practices?

9

10 A. No. Contrary to Mr. Martinez' description, LENS does provide access
11 to BellSouth's telephone number reservation system; numbers so
12 reserved are held in the system. No confirmation is required, thus
13 there is no confirmation process requiring two business days. Mr.
14 Martinez' suggestion, at page 46, line 1 of his direct testimony that pre-
15 ordering functions in LENS require subsequent confirmation, either
16 manually or through another interface, is not correct. Once a telephone
17 number has been reserved through LENS, no subsequent confirmation
18 is required. However, despite the reservation of a telephone number or
19 the placing of a service order, BellSouth does not guarantee a
20 telephone number until service actually has been installed; this is true
21 for BellSouth's retail customers as well as for ALECs.

22

23 Q. Can ALECs provide the reserved numbers to their customers on a real-
24 time basis?

25

1 A. Yes. Also, while Mr. Martinez complains that ALECs must query the
2 system for each vanity number a customer might request, that is
3 exactly what a BellSouth service representative must do. Moreover,
4 the assertion by Mr. Martinez that "BellSouth as a whole" knows all
5 remaining vanity numbers and has decided to restrict both BellSouth
6 service representatives and ALECs from knowing them is simply
7 wrong. Vanity numbers are highly personal choices made by individual
8 customers; BellSouth has no way of knowing what word a customer
9 might someday want to spell, and does not "lock up" all the numbers
10 that might possibly spell a word, or, for that matter, an acronym such as
11 "MCI". Furthermore, even if BellSouth had a way of knowing, which it
12 does not, it would make little sense to restrict its sales personnel from
13 these numbers, as Mr. Martinez suggests. The facts are these: all
14 available numbers are contained in the number assignment database,
15 and access to any available number is provided for both ALECs and
16 BellSouth in substantially the same time and manner.

17

18 Q. According to Mr. Martinez, at pages 26-27, LENS only allows an ALEC
19 to print the billing name and address page of the CSR, and therefore
20 forces an ALEC representative to write the rest of the CSR information.
21 Is this an accurate portrayal?

22

23 A. No. LENS allows printing of all displayed customer service record
24 information.

25

1 Q. At line 12, page 27, Mr. Martinez states that an ALEC's customer
2 service representative, unlike BellSouth's, after reviewing the CSR,
3 "could not check that all of the customer information needed to submit
4 the order was correct without calling the customer back to verify . . .".
5 Do you agree?

6
7 A. No. Information about the customer's current services and features is
8 available electronically to the ALEC while the ALEC is on the initial call
9 with the customer.

10
11 Q. Mr. Martinez, at pages 31 and 32 of his direct testimony, criticizes the
12 feature availability capabilities in LENS. What is your response?

13
14 A. First, Mr. Martinez indicates that "nothing but the feature name is
15 provided." As shown on Exhibit GC-7 in my direct testimony, this is not
16 correct. LENS provides additional information, such as the availability
17 date of a feature, and the Uniform Service Order Code (USOC). Thus,
18 Mr. Martinez is simply incorrect in stating that "to determine the . . .
19 USOC information the ALEC would need to access and manually
20 record the information before proceeding on . . . while the customer
21 waits patiently on the line . . .". There is no need for an ALEC to
22 "manually record" information. The ALEC can "select" features, i.e.,
23 highlight the desired features on the computer screen. Selected
24 features will be carried forward by the system to a LENS service order.
25 For EDI ordering, MCI has the option of electronically transferring the

1 information from LENS to MCI's ordering documents, as discussed
2 earlier in this testimony.

3

4 Q. Does Mr. Martinez, at pages 32-34 of his direct testimony, accurately
5 describe the due date capabilities of LENS?

6

7 A. No. While Mr. Martinez suggests that an ALEC needs "history" to know
8 BellSouth's installation intervals, in fact, the LENS system provides
9 real-time due date information, as described in my direct testimony,
10 using the same system used for BellSouth's retail customers. While it
11 is true that either a telephone number or an address is required to
12 access the installation calendar, there is a very good reason for this
13 requirement. Installation schedules, whether for retail or ALEC
14 customers, vary depending on the particular circumstances for a given
15 location, such as work load, force schedules, and special
16 circumstances such as switch conversions in a particular office.
17 Therefore, either a telephone number or an address is required to
18 identify the particular location for which installation information is
19 needed. This is true for both retail and ALEC due dates.

20

21 Q. At page 32, Mr. Martinez claims there is no history of BellSouth's
22 intervals for the assignment of due dates. Has BellSouth provided this
23 information to MCI and other ALECs?

24

25

- 1 A. Standard due date interval information has been provided to ALECs
2 through an industry letter from BellSouth's Assistant Vice President for
3 Interconnection Services Sales.
4
- 5 Q. Mr. Martinez states a concern, at page 36, line 12 of his direct
6 testimony, about how ALECs will be able to access directory listing
7 information. Will LENS provide this capability?
8
- 9 A. Yes. This information is part of the customer service record information
10 that is available through LENS. This is shown on page three of
11 Rebuttal Exhibit GC-29. The lines labeled "LN" and "LA" provide the
12 listed name and listed address, respectively.
13
- 14 Q. At pages 24-25 of his direct testimony, Mr. Martinez lists seven types of
15 pre-ordering information, which in his view includes "access to the
16 information that an ALEC would require at the pre-ordering stage in
17 order to convert an existing customer's services through an unbundling
18 situation involving a second ALEC" (emphasis added). Mr. Martinez
19 also refers to this at page 36, line 14. Do you agree that BellSouth
20 must provide this information?
21
- 22 A. No. LENS currently provides six of the seven items on Mr. Martinez'
23 list. However, the seventh item proposed by Mr. Martinez appears to
24 expand the definition of pre-ordering information beyond that
25 addressed in the arbitrations. I am not aware of any requirement for

1 BellSouth to provide information to one ALEC about another ALEC's
2 customers.

3

4 Q. Mr. Martinez, at page 38, line 15 of his direct testimony, states that
5 "BellSouth readily admits that their ordering systems are not and will
6 not be ready for UNEs [unbundled network elements]". Is this
7 accurate?

8

9 A. No. While Mr. Martinez provides neither a source nor a date for this
10 purported admission, the fact is that BellSouth's ordering and
11 provisioning systems can electronically accept orders for unbundled
12 network elements today. This was described in the ordering section of
13 my *direct testimony*. Thus, Mr. Martinez' further contention that the
14 ALEC must "fill out and then fax four (4) separate order forms" for a
15 UNE order is not correct, because orders can be transmitted
16 electronically today. Furthermore, even where an ALEC chooses to fax
17 orders rather than using BellSouth's available electronic interfaces,
18 BellSouth uses ordering forms approved by the Ordering and Billing
19 Forum (OBF). The OBF establishes the industry ordering requirements
20 Mr. Martinez emphasizes so heavily in other sections of his testimony.
21 Thus, the requirement for four ordering forms merely represents
22 BellSouth's compliance with the standards Mr. Martinez otherwise
23 advocates that BellSouth adopt.

24

25

- 1 Q. Please comment on Mr. Martinez' testimony, at page 39 of his direct
2 testimony, regarding BellSouth's ordering processes for business
3 services.
4
- 5 A. First, BellSouth has electronic ordering capabilities for many business
6 services; the services available through EDI with mechanized order
7 generation are listed on Exhibit GC-19 in my direct testimony. In
8 addition, BellSouth provides electronic ordering capabilities for some
9 complex services, such as PBX trunks, hunting, SynchroNet® service,
10 and basic rate ISDN service. Mr. Martinez also complains, at page 41
11 of his direct testimony, about manual handling of complex orders.
12 However, as addressed in my direct testimony, BellSouth uses many
13 manual processes for complex retail orders, and BellSouth has
14 established resale procedures for complex services that rely on the
15 same processes.
16
- 17 Q. Mr. Martinez suggests, at page 41 of his direct testimony, that even for
18 complex orders where most of the activities are handled manually, that
19 ALECs should have the ability to physically input the final order into
20 BellSouth's ordering system. Would this affect the ALECs' ability to
21 serve its customers in substantially the same time and manner as
22 BellSouth?
23
- 24 A. No. This capability does not affect the end user customer's interaction
25 with either BellSouth or the ALEC. Consider again the SmartRing®

1 service example in my direct testimony. The interaction with the end
2 user takes place over an extended period of time, as the sale and
3 implementation proceeds through the service inquiry and design
4 phases. The eventual retail order is typed into BellSouth's systems
5 weeks after the sales and design process has begun, by an employee
6 who has no direct contact with the customer. Thus, the fact that the
7 LCSC, acting on behalf of the ALEC, is the party ultimately typing a
8 final resale SmartRing® service order into the ordering system has
9 absolutely no bearing on the ALEC's ability to serve its customer in
10 substantially the same time and manner as BellSouth. Furthermore,
11 while Mr. Martinez characterizes having the BellSouth ALEC account
12 team "manually in the loop" as "absurd", this is done for the ALEC's
13 benefit, to ensure that the ALEC reselling a complex service like
14 SmartRing® is afforded the same level of systems design and other
15 support as a BellSouth retail customer.

16

17 Q. Mr. Martinez' testimony, at page 44, line 3 of his direct testimony,
18 indicates that BellSouth's EDI interface is not acceptable because "it is
19 not keeping pace with the work being done at the OBF." Is this
20 accurate?

21

22 A. No, and in fact, Mr. Martinez provides no support for his contention.
23 BellSouth initiated its EDI ordering implementation in May, 1996, on the
24 basis of an April, 1996, OBF recommendation to use EDI, but in
25 advance of detailed implementation work by industry groups such as

1 OBF and others. Given that BellSouth actually has been operating
2 ahead of the industry, BellSouth has indicated all along that some
3 rework of its EDI ordering interface might become necessary as the
4 industry moved forward, and indeed, that has been the case.

5

6

7 Q. Mr. Martinez states, at page 44, line 20 of his direct testimony, that
8 BellSouth has not provided for electronic ordering of interim local
9 number portability. Is this correct?

10

11 A. No. Mr. Martinez apparently is not familiar with the EDI ordering
12 capabilities. Screens used for ordering interim local number portability
13 from the EDI-PC package are shown in Exhibit GC-17 in my direct
14 testimony; page two of that exhibit shows the section in which an ALEC
15 specifies the number of paths for a ported number. The paper forms to
16 which Mr. Martinez refers are made available for ALECs who choose
17 not to order electronically.

18

19 Q. Please comment on Mr. Martinez' assertion, at page 44 of his direct
20 testimony, that BellSouth's systems provide for limited "flow through".

21

22 A. BellSouth's systems in fact provide for extensive "flow through", which
23 is the mechanized order generation process described in my direct
24 testimony in the discussion of the Local Exchange Service Order
25 Generator (LESOG). The sole purpose of creating LESOG was to

1 allow correct and complete orders transmitted electronically to
2 BellSouth to be entered mechanically into BellSouth's downstream
3 provisioning systems without manual intervention by BellSouth. There
4 is no manual verification process or "extra step" as described by Mr.
5 Martinez. Thus, the "bottleneck" he envisions is illusory.

6

7 Q. Mr. Martinez states that BellSouth Long Distance "is the only long
8 distance company listed as a feature that can be selected by clicking
9 on the feature table." Is this accurate?

10

11 A. Not at all. Any available long distance company can be selected by
12 clicking on the feature table, or by typing in the carrier code. I have
13 verified this personally by using LENS to make changes to my
14 residence telephone service.

15

16 Q. Mr. Martinez also states, at pages 41 and 42 of his direct testimony,
17 that BellSouth "will not permit ALECs to submit orders to switch a
18 customer 'as specified'," and goes on to describe at length the
19 competitive difficulties he envisions as a result. Is Mr. Martinez
20 correct?

21

22 A. No, and in fact, this testimony is highly surprising in light of Mr.
23 Martinez' previous testimony in similar proceedings in other states.
24 During cross-examination in hearings before the Georgia Public
25 Service Commission in March, 1997, Mr. Martinez admitted ALECs can

1 submit orders to switch customers "as specified." (Georgia Public
2 Service Commission, Docket No. 6863-U, March 7, 1997, pages 2695-
3 96.) "Conversion as specified" is an activity type agreed upon by OBF,
4 and is supported by BellSouth through both the EDI ordering interface
5 and the LENS ordering capability. This is displayed for EDI on page
6 three of Exhibit GC-17 in my direct testimony.

7

8 Q. Mr. Martinez, at page 46 of his direct testimony, states that "BellSouth
9 has provided scant information on the details of how to process a
10 trouble report". Do you agree?

11

12 A. No. First, 22 MCI representatives attended an ALEC conference
13 hosted by BellSouth April 1-3, 1997, during which ALECs were given
14 hands-on demonstrations of BellSouth's TAFI system for trouble
15 reporting. Next, on May 8, 1997, MCI's BellSouth account team
16 provided MCI with a 300 page TAFI user guide.

17

18 Q. Is Mr. Martinez correct in his statements on pages 47-49 of his direct
19 testimony, that BellSouth is offering ALECs a "batch" trouble reporting
20 interface for interconnection and unbundled elements?

21

22 A. Absolutely not. Beyond TAFI, which also is a real-time interface, the
23 additional trouble reporting interface BellSouth offers for designed
24 services is the industry standard electronic bonding arrangement
25 currently used by interexchange carriers, including MCI. This is a real-

1 time -- not batch -- interface. Therefore, Mr. Martinez' enumeration of
2 the competitive problems he envisions with a batch interface is
3 irrelevant.

4

5 Q. Mr. Martinez states, at page 47 of his direct testimony, that BellSouth's
6 LCSC will handle ALECs' maintenance requests for interconnection
7 and unbundled network elements. Is this correct?

8

9 A. No. First, as described earlier, there are electronic interfaces available
10 for ALECs' maintenance requests. Troubles for ALECs who choose to
11 report troubles verbally are handled by dedicated provisioning and
12 repair groups, not by the LCSC, which is an ordering center.

13

14 Q. Does Mr. Martinez, at pages 48-49 of his direct testimony, provide an
15 accurate description of BellSouth's resale repair processes?

16

17 A. No, important information is omitted. As noted earlier in this testimony,
18 TAFI provides ALECs with the ability to handle completely their
19 customers' exchange line troubles, and the electronic bonding interface
20 provides the electronic capability to report troubles and obtain
21 information on resold designed services; both are real-time interfaces.
22 Neither retail repair center nor account team involvement is required.

23

24 Q. Please respond to Mr. Martinez' complaints regarding billing usage.

25

1 A. It is true that BellSouth's daily billable usage feeds do not contain data
2 on non-billable usage. However, their very purpose is to provide billing
3 data, as required by the FCC and this Commission. To my knowledge,
4 MCI did not arbitrate the issue of whether a billing interface should
5 provide non-billing information. Nonetheless, should MCI determine it
6 requires such information and is willing to pay for the development of
7 an appropriate capability, MCI is free to submit a bona fide request. To
8 date, however, they have not done so.

9

10 Q. Both Mr. Bradbury and Mr. Martinez raise questions about BellSouth's
11 documentation of its interfaces. Please describe the documentation
12 available for EDI, LENS and TAFI.

13

14 A. The July, 1997 LENS User Guide is provided with this testimony as
15 Rebuttal Exhibit GC-30. The July, 1997, three volume Local Exchange
16 Ordering (LEO) implementation guide is provided as Rebuttal Exhibit
17 GC-31. This guide contains EDI information and ordering requirements.
18 Documentation for the EDI-PC package is available from the third party
19 developer of that software. The July, 1997 version of the TAFI User
20 Guide and reference materials is provided as Rebuttal Exhibit GC-32.

21

22 Q. Please summarize your testimony.

23

24 A. While other parties' witnesses purport to address electronic interfaces
25 to operational support systems, they focus on many interim processes

1 and procedures while largely ignoring the available electronic interfaces
2 that would obviate many of their stated concerns. Much of the
3 intervenors' testimony is devoted to criticizing the *ordering* capabilities
4 of BellSouth's Local Exchange Navigation System (LENS). However,
5 pre-ordering is the primary function of LENS. The industry standard for
6 ALEC ordering is EDI, and BellSouth's EDI interface provides the
7 ordering capabilities many intervenors, particularly Mr. Bradbury, cite
8 as lacking in LENS. In many instances it appears that these
9 intervenors either are not aware of the electronic interfaces BellSouth
10 has made available for ALECs, or have chosen not to take advantage
11 of the interfaces available. Mr. Martinez' testimony, in particular, is
12 replete with inaccuracies about the capabilities of BellSouth's electronic
13 interfaces for ALECs and the capabilities of BellSouth's retail systems.
14 In his "background" information, Mr. Martinez makes many vague
15 assertions about incumbent local exchange carriers generally, without
16 providing specifics to indicate whether the generalities have any
17 particular relevance to BellSouth. BellSouth provides ALECs with
18 access to the information and functions in BellSouth's operational
19 support systems in substantially the same time and manner as
20 BellSouth's access for its retail systems.

21

22 Q. Does this conclude your testimony?

23

24 A. Yes.

25

1 BY MR. ELLENBERG:

2 Q Ms. Calhoun, were there attached to your rebuttal
3 testimony five exhibits?

4 A Yes.

5 MR. ELLENBERG: BellSouth asks that those
6 exhibits be marked for purposes of identification as
7 Composite Exhibit 42.

8 CHAIRMAN JOHNSON: Be marked as Composite 42.

9 BY MR. ELLENBERG:

10 Q Ms. Calhoun, have you prepared a summary of your
11 testimony?

12 A Yes, I have.

13 Q And I understand that as a part of your summary
14 you will be performing a demonstration of certain of the
15 interfaces that BellSouth has developed to accommodate CLEC
16 interest; is that correct?

17 A That's correct.

18 MR. ELLENBERG: Commissioners, during the break,
19 in addition to setting up the equipment, we passed out two
20 exhibits. The first of those is entitled "BellSouth's
21 Currently Available Electronic Interfaces." That is an
22 exhibit to Ms. Calhoun's rebuttal testimony and has now
23 been marked for identification. The second exhibit for
24 demonstrative purposes is a three-page exhibit, and those
25 are the slides that you will be seeing to my left, to your

1 right on the screen as Ms. Calhoun gives her summary.
2 Copies of those were provided to the parties as well.

3 CHAIRMAN JOHNSON: I'm sorry, the GC-28 -- I'm a
4 little confused on these.

5 MR. ELLENBERG: GC-28 has now been marked for
6 identification as a part of Exhibit 42.

7 CHAIRMAN JOHNSON: Okay. And is this a part of
8 GC-28?

9 MR. ELLENBERG: We are not marking it at this
10 time. These are slides that will be shown on the screen to
11 your right as Ms. Calhoun goes through her summary and
12 demonstration.

13 CHAIRMAN JOHNSON: And this other document, Nancy
14 White letter, is that staff's or --

15 MR. ELLENBERG: I'm not responsible for that one.

16 CHAIRMAN JOHNSON: Okay. I was confusing it with
17 yours then. Let me --

18 MS. WHITE: No, I believe that was a supplemental
19 response to an interrogatory by staff, BellSouth's
20 supplemental response to an interrogatory by staff that was
21 taken up right before the break, I believe.

22 CHAIRMAN JOHNSON: Okay. Then let me make sure I
23 have these identified properly. 41 was a composite
24 exhibit. I had GC-1 through 27?

25 MR. ELLENBERG: Right. This is the first page of

1 Exhibit 42.

2 CHAIRMAN JOHNSON: Okay. And it would be GC-28.
3 Was there a GC-29?

4 MR. ELLENBERG: Yes, there were 28 -- excuse me,
5 1 through 32.

6 CHAIRMAN JOHNSON: Because my --

7 MR. ELLENBERG: Let me straighten this out. We
8 had 27 exhibits to Ms. Calhoun's direct testimony. Those
9 were marked as a Composite Exhibit 41.

10 CHAIRMAN JOHNSON: Right.

11 MR. ELLENBERG: There were five exhibits to her
12 rebuttal testimony marked as a Composite Exhibit 42.
13 GC-28, that we've just handed out additional copies, would
14 be the first page of now Composite Exhibit 42.

15 CHAIRMAN JOHNSON: Okay.

16 COMMISSIONER KIESLING: Maybe I can help clarify
17 it. The five exhibits that are now Composite 42 are GC-28
18 through 32.

19 MR. ELLENBERG: That is correct.

20 COMMISSIONER KIESLING: Thank you.

21 CHAIRMAN JOHNSON: Yeah, my only problem was I
22 didn't see anything identified as a 29 in my stack, a
23 GC-29, but what would have been that individual --

24 MR. ELLENBERG: 28 through 32, five exhibits,
25 were attached to the rebuttal testimony.

1 CHAIRMAN JOHNSON: Okay. Maybe I'm just missing
2 my copy then.

3 MR. ELLENBERG: Shall we proceed?

4 CHAIRMAN JOHNSON: We'll continue and I'll go
5 back and follow up on it.

6 MS. KAUFMAN: Excuse me, Chairman Johnson. I
7 don't think all the parties have received copies of
8 Ms. Calhoun's slides, at least I have not.

9 MR. ELLENBERG: We will make additional copies
10 available. We ran short.

11 CHAIRMAN JOHNSON: Okay. Thank you.

12 BY MR. ELLENBERG:

13 Q Ms. Calhoun, will you be assisted in the
14 demonstration by Mr. Wood?

15 A Yes.

16 Q And he will be operating the computer console as
17 you prepare --

18 A Yes.

19 Q Would you now give us your summary and
20 demonstration?

21 A Yes. Good afternoon. I'm happy to be here today
22 to describe for you the electronic interfaces that
23 BellSouth has made available for alternative local exchange
24 carriers, and I'll have to warn you from the very beginning
25 that I tend to use the term ALEC and CLEC interchangeably,

1 so if I happen to do that, I mean the same thing.

2 The first thing I would like to do for you with
3 the first chart that was handed out is to quickly summarize
4 for you the electronic interfaces BellSouth has made
5 available for use by ALECs, and I've organized this chart
6 by the processes or the functions that we are required by
7 the FCC's order.

8 The FCC required BellSouth to make available the
9 information and functions in its operation support systems
10 to CLECs in substantially the same time and manner as
11 BellSouth's access for its retail operations, and that is
12 what BellSouth has done. For the first process known as
13 pre-ordering, BellSouth provides an interface known as the
14 local exchange navigation system or LENS. The functions
15 that LENS provides are some of the functions I will be
16 demonstrating here today, including address validation,
17 telephone numbers, products and services, due date
18 information or customer service record information.

19 What that means in practical terms is that when
20 BellSouth is talking to a retail customer about information
21 related to that customer's order, BellSouth is able, with
22 the customer on the phone, to give that customer
23 information about what telephone numbers are available or
24 what features and services are available in that customer's
25 area. And with the LENS system that BellSouth has

1 provided, CLECs are able to do the same thing; they are
2 able to serve their customers in substantially the same
3 time and manner because they can get access to information
4 from the same data bases that BellSouth uses to support its
5 retail operations. There is no industry standard for
6 pre-ordering as yet, but BellSouth nonetheless provides
7 electronic real time interactive access to the same data
8 bases that contain pre-ordering information for retail
9 customers.

10 For ordering and provisioning, BellSouth provides
11 an industry standard electronic data interchange interface,
12 and that interface supports a total of 34 resale services
13 that collectively represent most of BellSouth's total
14 retail operating revenue. It includes some complex
15 services and also some unbundled network elements. There
16 are other unbundled network elements that I tend to think
17 of as being more infrastructure related rather than things
18 that are related to an individual end user. An individual
19 end user would perhaps use an unbundled loop. Tandem
20 switching or collocation are the types of unbundled
21 elements that might apply to an ALEC's infrastructure, and
22 those typically are ordered by another industry standard
23 process via an electronic interface known as the exchange
24 access control and tracking system, or also known as
25 EXACT.

1 BellSouth is relying on the combination of the
2 EDI and EXACT ordering interfaces for its nondiscriminatory
3 access for ordering and provisioning. BellSouth also
4 provides an interactive ordering capability through its
5 LENS system.

6 For maintenance and repair, BellSouth provides
7 access to a system known as the trouble analysis
8 facilitation interface, which is better known as TAFI; and
9 TAFI is an electronic real time interactive expert system
10 that is the same trouble handling system used by BellSouth
11 for its retail exchange services. And the full
12 functionality of that system has been made available to
13 ALECs for their use in serving their customers as well.

14 BellSouth also for designed services or circuits
15 that are not supported via TAFI, for either BellSouth's
16 retail customers or for ALECs, BellSouth makes available an
17 industry standard electronic gateway interface. It's the
18 same electronic bonding interface currently used by
19 interexchange carriers for similar circuits.

20 For billing BellSouth provides ALECs with a daily
21 usage file of billable usage, and that is provided in an
22 industry standard data format, and that contains things
23 like billable usage, such as directory assistance, other
24 things that might be associated with a resold line or an
25 interim number portability account, anything for which

1 there is a usage base charge, and it would also apply to
2 things such as unbundled ports, which also could generate
3 usage base charges.

4 Now this chart is describing the best of what
5 BellSouth has available today. There has been a great deal
6 of testimony about other processes, some of those interim
7 in nature, some things that BellSouth deployed early on to
8 allow CLECs who were anxious to enter the local market to
9 do so prior to the availability of these interfaces, but
10 it's important not to confuse those with the best of what
11 BellSouth has available today, and that's what I'm here to
12 show you.

13 I'm not going to be demonstrating each and every
14 thing on this chart. What I am going to do is focus on
15 some of the things that have generated the most discussion
16 and the most testimony, and I'll be doing that using two
17 screens. Let me start by explaining what will be on each
18 one.

19 On the screen to your right, the slides that are
20 on this handout are just an overview. They are a pictorial
21 representation of what is going on behind the scenes in
22 some of these systems where the screens in front of you are
23 going to be demonstrating live access into these systems,
24 how these systems actually function. If you were an ALEC
25 actually using one of these systems, this is what you would

1 see.

2 COMMISSIONER GARCIA: I'm sorry, what are the
3 distinction in the screens? I missed that. You said
4 that --

5 WITNESS CALHOUN: The ones over here are just
6 pictorial representations of some of the data base
7 relationships and showing some of the underlying workings
8 of what's going on and the relationship to BellSouth
9 operational support systems, and then what you'll be seeing
10 in front of you are actually the live functioning of the
11 screens interacting with the data bases.

12 And Mr. Ellenberg introduced Mr. Wood. What
13 Mr. Wood is going to be doing is playing the role of a CLEC
14 or ALEC service representative. I have to caution you
15 though that he is not a service representative, but he does
16 an admirable job of playing that role for us.

17 The other thing I would like to point out is that
18 there are different ways of accessing the various systems
19 that I'm going to demonstrate. Some of the systems can be
20 accessed on a dial-up basis, and that's what we have done
21 here. One of the systems can be accessed via the Internet,
22 and also there is a possibility of what is known as a
23 LAN-to-LAN, or a local area network to a local area network
24 connection.

25 What I'm showing you here is dial-up, so it's

1 kind of the middle of the road. It's not necessarily going
2 to be the fastest response time that you might see if you
3 were operating on a LAN-to-LAN connection as many ALECs
4 are, but it will give you an idea of how a CLEC could
5 actually use this system.

6 Okay. The first thing that I'm going to do is
7 show you how a CLEC could use LENS, the local exchange
8 navigation system, to access pre-ordering information in
9 real time. Then I'm going to move on and show you how
10 CLECs could place orders for some services via the national
11 standard or the industry recommended EDI ordering
12 interface. And then I'm going to show you how a CLEC could
13 use LENS and EDI simultaneously. There has been a lot of
14 discussion about whether that is possible or how that would
15 work, so I'm going to show you one of the ways that it's
16 possible to do that. And then finally, I'll briefly show
17 you some of the functioning of the TAFI interface for
18 trouble reporting.

19 All right. The first thing I would like to
20 explain here -- and this is my first opportunity to use the
21 laser pen, so I'll try to get it right. The first thing
22 I'm going to do here is show you, first of all, by
23 operation support systems, I want to make it clear that the
24 data bases that are listed on the right side of this
25 drawing are the actual BellSouth operation support systems

1 that are being accessed.

2 LENS itself is an interface between the CLEC or
3 the ALEC and those operational support systems. What you
4 see labeled as a navigator is a system that regulates the
5 flow of information back and forth between the interface
6 and the data bases themselves. It's the same navigator
7 system that is used by BellSouth's retail operation systems
8 to obtain information from these same data bases.

9 And then I would like to point out that in the
10 bottom of this drawing you see EC-lite. EC-lite is an
11 alternative means of accessing information through the
12 navigators that resides in the data bases, and that is the
13 name for the customized interface that BellSouth is
14 building to AT&T's specifications at AT&T's request under
15 our interconnection agreements with AT&T.

16 All right. Let me briefly --

17 COMMISSIONER KIESLING: I have a question.

18 WITNESS CALHOUN: Yes.

19 COMMISSIONER KIESLING: Just so I'm clear, if you
20 use the EC-lite, you wouldn't use LENS, it's an alternate
21 way to get to the navigator besides LENS?

22 WITNESS CALHOUN: Yes. Yes.

23 COMMISSIONER KIESLING: Okay.

24 CHAIRMAN JOHNSON: Is EC-lite for the exclusive
25 use of AT&T, or is it available --

1 WITNESS CALHOUN: It would be available -- it's
2 time for my I'm-not-a-lawyer disclaimer, but as I
3 understand it, anything that is being made available under
4 our interconnection agreements is available to any other
5 party.

6 Just briefly, I'm going to go into some detail
7 about each of the data bases on the right, but each of the
8 functions that I'm going to show you in LENS corresponds to
9 one of these data bases. The first is the customer record
10 information system, and we'll look at the types of customer
11 record information that could be obtained through that data
12 base. RSAG relates to address validation. ATLAS is where
13 we get telephone numbers for assignment. PSIMs and COFFI
14 are locations of feature detail and information about what
15 services are available to a particular customer. And DSAP
16 is where due date information resides. And again, these
17 are all the same data bases that that information resides
18 in for BellSouth's use for its retail customers.

19 All right. The first thing I would like to do in
20 terms of the live systems then is to go to LENS, and we are
21 actually logged into the LENS system here just as a CLEC
22 will be. And you'll see that, first of all, for anyone who
23 has ever used a Windows-based PC application, it looks
24 fairly familiar. There are several functions that are
25 available on this main menu, and the one we are going to go

1 to is called the inquiry function.

2 The inquiry function gives us a number of choices
3 in the first drop down box, and you will see validating
4 address which corresponds to the RSAG data base; viewing
5 features and services which corresponds to the PSIMs and
6 COFFI data bases; reserving telephone numbers which
7 interacts with the ATLAS data base; viewing the
8 installation calendar that interacts with the DSAP data
9 base; and viewing the customer record which pulls
10 information from the CRIS data base.

11 Now the first thing I would like to do is show
12 you how we could obtain a customer service record. I as
13 playing the role of an ALEC am talking to a customer about
14 potentially becoming my customer, and you'll probably
15 recall during the arbitrations there was discussion about
16 making on-line customer record information available, and
17 LENS provides that capability. So if Mr. Wood would input
18 my home telephone number, I'll show you my customer service
19 record.

20 The first thing you'll see happen is that the
21 CLEC is asked to indicate that they have the customer's
22 permission to access the records. The CLEC will have given
23 us a blanket letter of authorization stating that they want
24 access to customer's records without their permission.
25 Obviously I have authorized Mr. Wood to do this.

1 And my customer record information is returned
2 real time on line. It provides information such as my
3 listed name, listed address, additional listing
4 information. The Dir. section gives directory delivery
5 information, what types of directories and how many I
6 receive, billing name and information. And we can continue
7 on down through, and it will show the existing services
8 that I have and information associated with those
9 particular services, the features that I have currently on
10 my account.

11 Now there has been discussion about whether an
12 ALEC using this system would have to manually reenter this
13 information in its own systems. The first thing I would
14 like to show you is that by using a simple Windows-based
15 function that is available in any, you know, Windows type
16 application, you can simply highlight this information,
17 pick it up electronically and move it into another
18 application where the CLEC will then have a permanent
19 record of it, and here we are going to move it into the
20 Windows note pad.

21 COMMISSIONER CLARK: Is this what you call the
22 cut and paste?

23 WITNESS CALHOUN: Yes.

24 COMMISSIONER CLARK: Why is cut and paste easier
25 than reentering it?

1 WITNESS CALHOUN: Well, as you can see, with just
2 a couple of key strokes there, we were able to pick up that
3 entire customer record and move it over and make a complete
4 copy of it.

5 COMMISSIONER CLARK: You are sure it's easier?

6 WITNESS CALHOUN: Yes. Yes. I mean I could ask
7 Mr. Wood to try to manually retype my entire customer
8 service record, but there are, let's see, two keys held
9 down simultaneously to pick it up and two more held down
10 simultaneously to drop it in the other application.

11 COMMISSIONER CLARK: You can get lots of
12 information moved, is that right, with just --

13 WITNESS CALHOUN: Yes.

14 COMMISSIONER CLARK: Okay. All right. I was
15 just concerned you had like each piece of information and
16 move it.

17 WITNESS CALHOUN: Well, we can look at -- there
18 is some application for that that we can look at a little
19 later, and I can show you how that would work; but here, as
20 you can see, we've got -- if you can split the screen.
21 You can see that we still have LENS running live, and we
22 have the customer record up on LENS, and we have a complete
23 copy of it now on the hard drive of the PC, so that we've
24 just made a complete copy of it in the time it took to do
25 that.

1 COMMISSIONER CLARK: Okay.

2 WITNESS CALHOUN: Okay.

3 All right. Now that all that information is
4 available, it's available, the CLEC has kept a record of it
5 so they know everything that the customer had at the
6 starting point. The next thing I would like to show you is
7 how a, how I could change my telephone number. If I said,
8 well, I would really like to come to the ALEC, but I have
9 been wanting to change my telephone number, and could you
10 do that for me at the same time? Are there other numbers
11 available that I might like better?

12 And so we go to the reserve telephone number
13 function, and what I would like to do here, there are two
14 ways you can do this, I can just put in my existing
15 telephone number and the state, but we could go to -- we
16 could just click on okay, and it would ask me to input an
17 address. So it works for customers who have existing
18 service; it works for customers who don't have existing
19 service. So in this case we'll just put in my address and
20 ask the system to validate the address. At the same time
21 it does that, as it's validating my address, the system is
22 looking to see which central office is associated with my
23 address, and it's going to return information about that
24 central office and the telephone numbers that are available
25 in that central office.

1 The system tells me that the address is, in fact,
2 valid. We would not have seen all this if I had just
3 simply put in the telephone number, but again, to
4 demonstrate address validation at the same time, I went
5 ahead and did it using the address; it can be done either
6 way.

7 And now the system will come back and tell me
8 that in my particular central office, which is identified
9 by my area code, the first three digits of my telephone
10 number and the common language code for my office, I can
11 ask for various types of numbers. In the drop down box
12 you'll see I have a choice. The default is random numbers,
13 but I can ask for a vanity number if I want to try to spell
14 something that's of interest to me. If I want to ask for
15 an easy number, and ascending line digit, descending line
16 digit, identical line numbers, sequential line numbers,
17 lots of different options there. Some of those are options
18 that BellSouth retail service representatives also have.
19 Some of them, such as ascending line digits, descending and
20 identical line digits are not options that BellSouth retail
21 service reps have, but it's a capability that we have built
22 into LENS.

23 In this case I'll just take random numbers, and
24 the system will return to me a choice of ten numbers.

25 CHAIRMAN JOHNSON: Let me make sure I understand

1 what you said earlier about the ascending and descending.
2 You said Bell does not have -- you said some of those
3 numbers, or that having that function -- or Bell operators
4 don't have that function?

5 WITNESS CALHOUN: Right.

6 CHAIRMAN JOHNSON: Or that capability.

7 WITNESS CALHOUN: Our systems are older. It's
8 not something that was ever built into our systems. It's
9 something that our services representatives have asked for
10 from time to time, and so as we were building LENS we went
11 ahead and built it in.

12 COMMISSIONER GARCIA: But I think business
13 customers though are allowed to sort of have some type of
14 variation on when they select a number, aren't they?

15 WITNESS CALHOUN: Yes. Let me make sure I'm
16 making this clear. BellSouth's retail customers can ask
17 for certain types of numbers but not all the choices that
18 the ALECs have.

19 CHAIRMAN JOHNSON: And those two choice that they
20 did not have was the ascending and descending?

21 WITNESS CALHOUN: Ascending and descending and
22 identical.

23 CHAIRMAN JOHNSON: Okay.

24 A And these are the telephone numbers that are
25 available, and I think I like 355-8580 better than the

1 number I already have, and so I, the ALEC, can reserve this
2 telephone number for my new customer and include that on
3 the order if the customer decides to come to me.

4 (Transcript continues in sequence in Volume X)

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