1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   DIRECT TESTIMONY OF RONALD M. PATE

3   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4   DOCKET NO. 990750-TP

5   August 16, 1999

6

7   Q.   PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH

8   TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

10 A.   My name is Ronald M. Pate. I am employed by BellSouth

11   Telecommunications, Inc. ("BellSouth") as a Director, Interconnection

12   Services. In this position, I handle certain issues related to local

13   interconnection matters, primarily operations support systems ("OSS").

14   My business address is 675 West Peachtree Street, Atlanta, Georgia

15   30375.

16

17 Q.   PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18

19 A.   I graduated from Georgia Institute of Technology in Atlanta, Georgia, in

20   1973, with a Bachelor of Science Degree. In 1984, I received a

21   Masters of Business Administration from Georgia State University. My

22   professional career spans over twenty-five years of general

23   management experience in operations, logistics management, human

24   resources, sales and marketing. I joined BellSouth in 1987, and have

25   held various positions of increasing responsibility.

1

1

2 Q. HAVE YOU TESTIFIED PREVIOUSLY?

3

4 A. Yes. I have testified before the Alabama, Florida, and Louisiana Public

5   Service Commissions.

6

7 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

8

9 A. The purpose of my testimony is to provide BellSouth's position on

10   ITC^DeltaCom's Issue Nos. 2, subpart a and subpart c, 2(a)(i), 2(g),

11   3(l), 3(m), and 6(a) raised by ITC^DeltaCom Communications, Inc.

12   ("ITC^DeltaCom") in its Petition for Arbitration filed with the Florida

13   Public Service Commission ("Commission") on June 11, 1999.

14

15 *Issue 3(b) [ITC^DeltaCom No. 2] Pursuant to the definition of parity,*

16 *should BellSouth be required to provide the following: (1) Operational*

17 *Support Systems ("OSS"), (2) UNEs, (3) White Page Listings, (4) Access*

18 *to Numbering Resources, (5) An Unbundled Loop using Integrated*

19 *Digital Loop Carrier (IDLC) Technology, (6) Interconnection, (7) Service*

20 *Intervals on winbacks, (8) Priority guidelines for repair and maintenance*

21 *and UNE provisioning, and (9) White Page Listings to independent third*

22 *party publishers?*

23

24 Q. WHICH PARTS OF THE ABOVE ISSUE ARE YOU ADDRESING?

25

1　A.　My testimony addresses sub-parts (1) and (3). Sub-parts (2), (6), (7)

2　　　and (9) are addressed in the testimony of BellSouth Witness, Mr.

3　　　Alphonso Varner. Sub-parts (4), (5), and (8) are addressed in the

4　　　testimony of BellSouth witness, Mr. Keith Milner.

5

6　***Issue 3(b(1): [ITC^DeltaCom No. 2] Pursuant to the definition of parity,***

7　***should BellSouth be required to provide Operational Support Systems***

8　***("OSS")?***

9

10　Q.　WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12　A.　BellSouth currently provides the following nondiscriminatory electronic

13　　　interfaces to its Operational Support Systems ("OSS") for Alternative Local

14　　　Exchange Companies ("ALECs"): Local Exchange Navigation System

15　　　("LENS") for pre-ordering, ordering, and provisioning for simple resale

16　　　services; Telecommunication Access Gateway ("TAG") for pre-ordering,

17　　　ordering, and provisioning for simple resale services and seven unbundled

18　　　network elements; Electronic Data Interexchange ("EDI") for ordering and

19　　　provisioning of simple resale services and seven unbundled network elements;

20　　　Trouble Analysis and Facilities Interface ("TAFI") for maintenance and repair;

21　　　Electronic Communications Trouble Administration ("ECTA") for maintenance

22　　　and repair; and Optional Daily Usage File ("ODUF"), Enhanced Optional Daily

23　　　Usage File ("EODUF"), and Access Optional Daily Usage File ("ADUF") for

24　　　billing. BellSouth also offers ALECs manual interfaces to its OSS. These

25　　　interfaces allow ALECs to perform the functions of pre-ordering, ordering,

1   provisioning, maintenance and repair, and billing for resale services in

2   substantially the same time and manner as BellSouth does for itself; and, in

3   the case of unbundled network elements, provide a reasonable competitor

4   with a meaningful opportunity to compete. BellSouth is not obligated to

5   provide ALECs with any additional OSS.

6

7   **Issue 3(b(3): [ITC^DeltaCom No. 2] Pursuant to the definition of parity,**

8   **should BellSouth be required to provide White Page Listings?**

9

10 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12 A. Pursuant to the Federal Communication Commission's ("FCC's") Rules,

13   BellSouth provides all ALECs with nondiscriminatory access to white

14   pages directory listings. In paragraph 253 of its Second Louisiana

15   Order in CC Docket 98-121 dated October 13, 1998, the FCC states

16   that "BellSouth has demonstrated that it is providing white pages

17   directory listings for customers of competitive LECs telephone services,

18   and thus has satisfied the requirements of checklist item (viii)."

19   BellSouth continues to comply with this requirement and, thus, this

20   Commission need not address this issue further.

21

22 **Issue 4 [ITC^DeltaCom No. 2(a)(i)] Should BellSouth be required to**

23 **provide the specifications to enable ITC^DeltaCom to parse the**

24 **Customer Service Records (CSR's)? If so, how?**

25

1 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

2

3 A. Because BellSouth already provides non-discriminatory access to its

4 OSS in a manner that allows ALECs to parse CSR's, BellSouth should

5 not be required by the interconnection agreement to provide this

6 information in another format.

7

8 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF ITC^DELTACOM'S

9 POSITION ON THE PARSING FOR CSR'S?

10

11 A. ITC^DeltaCom claims that it "must have the ability to 'parse' the CSR so

12 that it can flow this information into" its own OSS.

13

14 Q. WHAT DOES "PARSE" MEAN?

15

16 A. To parse is simply to break down the information contained in the CSR

17 into certain fields.

18

19 Q. DOES BELLSOUTH ALREADY PROVIDE TO ITC^DELTACOM AND

20 OTHER ALECS CSR INFORMATION IN A MANNER THAT CAN BE

21 PARSED?

22

23 A. Yes. On August 18, 1998, the national standard TAG pre-ordering

24 interface was implemented. TAG is a national standard machine-to-

25 machine interface that can be integrated with the TAG ordering

1		interface (available since November 1, 1998). More importantly, the
2		TAG interface can also be integrated with the EDI ordering interface
3		(available since December 31, 1996), which is the ordering interface
4		used by ITC^DeltaCom. The CSR data which is delivered to the ALEC
5		via TAG can be parsed by the ALEC to exactly the level needed on an
6		order, just as BellSouth parses CSR's in its own retail operations.
7		
8	Q	IF THE ALEC INTEGRATES THE TAG PRE-ORDERING INTERFACE
9		WITH ITS TAG OR EDI INTERFACE AND WITH ITS OSS, WILL THE
10		CSR INFORMATION OBTAINED VIA TAG "FLOW INTO" ITS OWN
11		OSS?
12		
13	A.	Yes, that is the purpose of integratable, machine-to-machine interfaces.
14		ALECs, such as ITC^DeltaCom, can integrate the TAG pre-ordering
15		interface with the TAG ordering interface or the EDI ordering interface.
16		ALECs can integrate these interfaces with their own internal OSS.
17		Integration allows ALECs to ability to manipulate the data obtained via
18		the TAG pre-ordering interface. This includes the ability to parse CSR.
19		The data can be manipulated so that it will "flow into" an ALEC's OSS.
20		This is apparently what ITC^DeltaCom desires to do.
21		
22	Q.	IS ITC^DELTACOM USING THE TAG INTERFACE?
23	A.	No. Although ITC^DeltaCom expressed some interest in the TAG pre-
24		ordering interface by attending an orientation session in March 1998,
25		ITC^DeltaCom has informed BellSouth that it is not interested in

1   implementing the TAG pre-ordering interface. However, in an apparent

2   contradiction, ITC^DeltaCom states in Attachment 6, Paragraph 3.2 of

3   its draft interconnection agreement that it wants BellSouth to make TAG

4   available as a pre-ordering interface.

5

6 Q.   WHAT DOES ITC^DELTACOM USE FOR PRE-ORDERING AND

7   ORDERING?

8

9 A.   ITC^DeltaCom currently uses the human-to-machine LENS interface for

10   pre-ordering and the machine-to-machine EDI interface for ordering.

11

12 Q.   WHY IS ITC^DELTACOM RAISING AN ISSUE REGARDING A

13   SPECIFICATION FOR PARSING THE CSR?

14

15 A.   BellSouth can only speculate that because ITC^DeltaCom has declined

16   to use the TAG pre-ordering interface, but instead has requested a

17   specification for parsing the CSR, ITC^DeltaCom wants another type of

18   pre-ordering interface. If that is what ITC^DeltaCom wants, it should

19   negotiate directly with BellSouth for it rather than couching the issue in

20   terms of parsing of CSR's.

21

22 *Issue 5 [ITC^DeltaCom No. 2(a)(i)] Should BellSouth be required to*

23 *provide a download of the Regional Street Address Guide (RSAG)? If so*

24 *how?*

25

1   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE.

2

3   A.   BellSouth has made a proposal to ITC^DeltaCom to provide a

4   download of RSAG at rates and conditions to be negotiated.

5

6   Q   WHAT IS BELLSOUTH'S UNDERSTANDING OF ITC^DELTACOM'S

7   POSITION ON THE REGIONAL STREET ADDRESS GUIDE

8   ("RSAG")?

9

10   A.   In its Petition, ITC^DeltaCom simply claims that a download of the

11   RSAG database will increase its efficiency and accuracy.

12

13   Q.   WHAT DOES ITC^DELTACOM PROPOSE ABOUT AN RSAG

14   DOWNLOAD IN ITS DRAFT INTERCONNECTION AGREEMENT?

15

16   A.   ITC^DeltaCom states in Attachment 6, Paragraph 4.8.3 of the draft

17   interconnection agreement that BellSouth should be required to provide

18   "[a] subset of the Regional Street Address Guide ("RSAG"), as

19   determined by ITC^DeltaCom, transmitted electronically on a daily

20   basis, which includes street addresses and the associated serving

21   switches, enabling ITC^DeltaCom to map a customer address to a

22   specific serving switch."

23

24   ITC^DeltaCom, in other words, wants a download of RSAG in order to

25   validate end user customers' addresses.

1

2   Q.   WHAT IS THE RSAG?

3

4   A.   RSAG is a database containing information that can be used to perform

5   address validations. BellSouth provides to ALECs, including

6   ITC^DeltaCom, access to the RSAG database on a real time basis

7   through the LENS and the TAG pre-ordering interfaces. Since the

8   RSAG database is updated nightly, this means ALECs do have real-

9   time access via these interfaces to an up-to-date database.

10

11 Q.   HOW DOES BELLSOUTH PERFORM ADDRESS VALIDATION FOR

12   ITS RETAIL CUSTOMERS?

13

14 A.   For residence customers, BellSouth validates addresses using the

15   Regional Negotiation System ("RNS"). For business customers,

16   BellSouth uses the address validation screens in the Service Order

17   Negotiation System ("SONGS"). The BellSouth service representative

18   sends an inquiry to and receives a response from the RSAG via RNS

19   and SONGS.

20

21 Q.   HOW DO ALECS PERFORM ADDRESS VALIDATION?

22

23 A.   ALECs can and do perform the address validation function by using

24   LENS or TAG. Using either of these interfaces, the ALEC

25   representative sends an inquiry to and receives a response from the

9

1   same RSAG database that BellSouth accesses by using RNS and

2   SONGS. The RSAG database returns address information without

3   regard to whether the request originated from an ALEC or from

4   BellSouth.

5

6   Q   IF THE ALEC INTEGRATES THE TAG PRE-ORDERING INTERFACE

7   WITH ITS TAG ORDERING OR EDI ORDERING INTERFACE, WILL

8   THE INFORMATION OBTAINED FROM RSAG VIA TAG "FLOW" INTO

9   THE ORDERING INTERFACE EFFICIENTLY AND ACCURATELY?

10

11   A.   Yes, that is the purpose of integratable, machine-to-machine interfaces.

12

13   Q.   WHAT SEEMS TO BE THE PURPOSE OF ITC^DELTACOM'S

14   DESIRE TO HAVE BELLSOUTH REQUIRED TO PROVIDE A

15   DOWNLOAD OF THE DATABASE?

16

17   A.   BellSouth does not understand ITC^DeltaCom's position on this issue.

18   ITC^DeltaCom has not explained why real-time access via an electronic

19   interface is not acceptable. Throughout the Petition and the draft

20   interconnection agreement, ITC^DeltaCom stresses the importance of

21   an electronic interface for pre-ordering for real-time access to

22   BellSouth's OSS. Yet, by requesting a download of RSAG,

23   ITC^DeltaCom apparently wants a less efficient means of data access.

24   Further, BellSouth suspects that ITC^DeltaCom also wants to get the

25   download of RSAG for free. The language in ITC^DeltaCom's Petition

10

1		and draft agreement does not mention anything about payment for a
2		daily download of this database.
3		

Issue 22 [ITC^DeltaCom No. 2(g)] How should "order flow through" be defined?

6

7 Q. WHAT IS BELLSOUTH'S POSITION ON ISSUE 2(g)?

8

9 A. BellSouth does not believe that it is necessary for the interconnection

10 agreement to contain a definition of "flow through," nor does BellSouth

11 agree with ITC^DeltaCom's proposed definition.

12

13 Q. HOW DOES ITC^DELTACOM DEFINE FLOW THROUGH?

14

15 A. In its Petition, ITC^DeltaCom states that "[f]low through should be

16 defined to include end-to-end preordering and ordering processes."

17

18 Q. HOW DOES ITC^DELTACOM DEFINE FLOW THROUGH IN ITS

19 DRAFT OF THE INTERCONNECTION AGREEMENT?

20

21 A. ITC^DeltaCom's definition in its draft agreement is much more detailed

22 than its stated position in the Petition. In Attachment 6, Paragraph

23 4.7.1, ITC^DeltaCom states: "'Flow Through' is defined as an end-to-

24 end pre-ordering and ordering process, (including legacy BellSouth

25 applications) without manual intervention. Specifically, Flow Through,

11

1   includes electronic reporting of order status, electronic reporting of

2   errors and electronic notification of critical events such as 'jeopardy

3   notification' and rescheduled due dates. BellSouth shall provide Flow

4   Through of electronic processes in a manner consistent with industry

5   standards and, at a minimum, at a level of quality equivalent to itself or

6   to any ALEC with comparable systems."

7

8 Q.   DOES BELLSOUTH AGREE WITH ITC^DELTACOM'S DEFINITION IN

9   ITS PETITION OR IN IT'S DRAFT INTERCONNECTION

10   AGREEMENT?

11

12 A.   No. ITC^DeltaCom's uses the term "flow through" in a completely

13   different and contradictory manner than it is commonly used by

14   BellSouth and by the Federal Communications Commissions ("FCC").

15

16 Q.   HOW DOES THE FCC DEFINE "FLOW THROUGH"?

17

18 A.   In paragraph 107 of its Second Louisiana Order in CC Docket No. 98-

19   121 dated October 13 1998, the FCC states that "a competing carrier's

20   orders 'flow through' if they are transmitted electronically through the

21   gateway and accepted into BellSouth's back office order systems

22   without manual intervention."

23

24 Q.   HOW DOES BELLSOUTH DEFINE "FLOW THROUGH"?

25

1 A. Based upon the FCC's definition, BellSouth contends that a service

2 request flows through an electronic order system only when an ALEC or

3 BellSouth representative takes information directly from an end user

4 customer, inputs it directly into an electronic order interface without

5 making any changes or manipulating the customer's information, and

6 sends the complete and correct request downstream for mechanized

7 order generation.

8

9 Flow through for an ALEC Local Service Request (LSR) "starts" when

10 the complete and correct electronically-submitted LSR is sent via one of

11 the ALEC ordering interfaces (EDI, TAG, or LENS), flows through the

12 mechanical edit checking and local exchange service order generation

13 ("LESOG") system, is mechanically transformed into a service order by

14 LESOG, and is accepted by the Service Order Control System

15 ("SOCS") without any human intervention. Pre-ordering is not part of

16 this particular process, nor is electronic notification of order status and

17 jeopardies.

18

19 Q. HOW DOES BELLSOUTH CALCULATE AND REPORT FLOW

20 THROUGH?

21 A. The mathematical derivation of the flow through rate is reflected

22 monthly in the Percent Flow Through Service Requests report which is

23 already part of BellSouth's Service Quality Measurements ("SQM").

24 This report is published on BellSouth's Performance Measurements

25 Web site. Exhibit RMP-1 is an excerpt of the report for the month of

1   January 1999. The column labeled "ALEC Error Excluded Calculation"

2   provides the flow through rate. Looking at the report one can see that

3   the flow through rate for January 1999 was 89.89%.

4   The process for determining the "ALEC Error Excluded Calculation"

5   flow through is depicted in the BellSouth chart entitled: "ALEC Ordering

6   Process Flow," which is attached as page 2 of Exhibit RMP-1. In

7   summary, the calculation for the "ALEC Error Excluded Calculation"

8   flow through is:

$$\frac{\text{Issued Service Orders}}{\text{Total Mechanized LSRs} - (\text{Total Manual Fallout+Auto Clarifications+ALECcaused Errors})}$$

9   Using the January 1999 flow through report for the purpose of

10 illustration, the calculation is as follows:

$$\frac{48,397}{74,640-(8,742+5,485+6,574)} \approx 89.89\%$$

11 These same numbers from the January 1999 Flow Through Report are

12 used on page 2 of Exhibit RMP-1 to illustrate the derivation of flow

13 through.

14 This methodology for calculating flow through is in strict compliance

15 with the concept as defined above by the FCC.

16

14

1 Q. WHAT SEEMS TO BE THE PURPOSE OF THIS ISSUE AND OF

2   PARAGRAPHS 4.7.1 AND 4.7.2 OF THE DRAFT AGREEMENT?

3

4 A. BellSouth can only speculate that ITC^DeltaCom is attempting to have

5   this Commission require BellSouth to provide complete electronic pre-

6   ordering, ordering, and provisioning of all UNEs and resale services. If

7   indeed this is ITC^DeltaCom's position, it is inappropriate because even

8   BellSouth does not have that capability for itself. BellSouth is only

9   obligated to provide pre-ordering and ordering services in substantially

10   the same time and manner as BellSouth does for itself. What

11   ITC^DeltaCom is seeking far exceeds BellSouth's obligation under the

12   law. Clearly, the Commission should reject ITC^DeltaCom's misguided

13   efforts with respect to this issue.

14

15 Q. PLEASE COMMENT ON ITC^DELTACOM'S PARAGRAPH 4.7.2 OF

16   ATTACHMENT 6?

17

18 A. BellSouth does not understand what ITC^DeltaCom means when it

19   states in Paragraph 4.7.2 that "BellSouth shall provide parity of

20   application functionality and not simply 'access' to BellSouth's systems."

21   The 1996 Telecommunications Act at Section 251(c)(3) only requires

22   that BellSouth provide nondiscriminatory access to network elements,

23   which BellSouth has done via the nondiscriminatory interfaces it has

24   offered to ALECs. BellSouth provides access to the ALECs in

25   substantially the same time and manner as it does for itself.

15

1

2   BellSouth also does not agree with the rest of Paragraph 4.7.2, which

3   states that : "Capability shall be provided to process large orders, UNE

4   orders, and complex orders in a manner at parity to that afforded by

5   BellSouth to itself, its Affiliates, or any other Telecommunications

6   Carrier." First, as described by Mr. Al Varner in his testimony about

7   Issue 2, BellSouth does not use UNEs for itself. Second, large orders

8   and orders for complex services are handled manually for ALECs in

9   substantially the same time and manner as they are handled manually

10   for BellSouth customers.

11

12 Q. PLEASE DESCRIBE HOW BELLSOUTH SERVICE REQUESTS ARE

13   MANUALLY HANDLED FOR BELLSOUTH AND ALECS.

14

15 A. Before engaging in comparisons, it is important to note that non-

16   discriminatory access does not require that all information and functions

17   for ALECs must be electronic and involve no manual handling. Many

18   services, primarily complex services, involve substantial manual

19   handling by BellSouth account teams for BellSouth's own retail

20   customers. Thus, non-discriminatory access to certain functions for

21   ALECs also legitimately may involve manual processes for these same

22   functions.

23   The manual processes that BellSouth uses for complex resold services

24   offered to the ALECs are accomplished in substantially the same time

25   and manner as the processes used for BellSouth's complex retail

16

1   services. These processes are in compliance with the Act and the

2   FCC's rules. The specialized and complicated nature of complex

3   services, together with their relatively low volume of orders as

4   compared to basic exchange services, renders them less suitable for

5   mechanization, whether for retail or resale applications. Complex,

6   variable processes are difficult to mechanize, and BellSouth has

7   concluded that mechanizing many lower-volume complex retail services

8   would be imprudent for its own retail operations, in that the benefits of

9   mechanization would not justify the cost. Since the same manual

10 processes are in place for both ALEC and BellSouth retail orders, the

11 processes are competitively neutral, which is exactly what both the Act

12 and the FCC require.

13

14 There are two types of complex services: "Non-designed" and

15 "Designed." A "Non-designed" service is a class of service with a

16 Universal Service Order Code ("USOC") that does not require special

17 provisioning and is served by one central office or wire center. A

18 "Designed" service involves special engineering and provisioning.

19

20 An example of a "Designed" complex service for which retail handling is

21 not fully mechanized is Multiserv® service. This is a complex service

22 available to both BellSouth's retail customers and to resellers. In both

23 cases, the pre-ordering and ordering processes are largely manual.

24 Nonetheless, these manual pre-ordering and ordering processes are

25 substantially the same for both BellSouth retail and ALEC orders.

17

1   Orders for retail services are handled primarily by the appropriate

2   business unit for retail services -- BellSouth Business Systems ("BBS")

3   account teams. Orders for ALEC services are handled by the

4   appropriate business unit for ALEC services -- ALEC account teams

5   that are part of BellSouth's Interconnection Services ("ICS"). ICS's

6   account team's handling of complex services for ALECs is substantially

7   the same as BBS's account team's handling of complex services for

8   BellSouth's retail customers; they both use substantially the same

9   processes as described below.

10

11   Attached to my testimony is Exhibit RMP-2, which depicts the flow of

12   the process for ordering MultiServ® by ALECs and Exhibit RMP-3,

13   which depicts the flow of the process for ordering MultiServ® by

14   BellSouth's retail unit. To perform the pre-ordering activity for complex

15   services, which is known as a "service inquiry", a systems designer on

16   the appropriate BBS or ICS account team fills out an extensive paper

17   form and then provides that form to the project manager for further

18   manual activities. On approval of either the retail customer or the

19   ALEC, as appropriate, the paper service inquiry is re-initiated as a firm

20   order, which also is an extensive paper form with subsequent manual

21   distribution. In both the retail and the resale cases, the Firm Order

22   Package is manually handed off to the service center, where paper

23   service order worksheets are created to assist in initiating service

24   orders in the ordering system. At that point, orders are typed into the

25   appropriate service order system for the customer's location, either the

1   Direct Order Entry ("DOE") system (in North Carolina, South Carolina,

2   Georgia, and Florida) or the SONGS (in Alabama, Kentucky, Louisiana,

3   Mississippi, and Tennessee). This order entry is the same for both the

4   retail and the resale situations, and thus, does not result in a different

5   customer "experience" in either case. The person who enters the

6   complex order in BellSouth's systems never has any contact with the

7   end-user customer, whether the customer belongs to an ALEC or

8   BellSouth. After the service order is input, the account team and

9   project managers are notified by e-mail of the service order numbers

10   and due dates. The account team manually reviews the service order

11   for accuracy and follows up as necessary. These processes, with their

12   substantial reliance on manual handling and paper forms, are common

13   to both retail and ALEC orders. Thus, BellSouth provides to ALECs the

14   ability to order complex services in substantially the same time and

15   manner as it provides to its retail customers.

16

17   *Issue 25 [ITC^DeltaCom No. 3(b)] Should ITC^DeltaCom and BellSouth*

18   *be required to follow the ATIS/OBF business rules?*

19

20   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

21

22   A.   It is BellSouth's understanding that this issue has been resolved by the

23   parties; however, BellSouth reserves the right to file testimony on this

24   issue, should it be further disputed.

25

19

1   *Issue 26 [ITC^DeltaCom No. 3(d)] Should BellSouth be required to*

2   *provide ITC^DeltaCom access to Universal Service Order Codes*

3   *(USOCs), Field Identifiers (FIDs) and other information necessary to*

4   *process orders in a downloadable format?*

5

6   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

7

8   A.   It is BellSouth's understanding that this issue has been resolved by the

9   parties; however, BellSouth reserves the right to file testimony on this

10   issue, should it be further disputed.

11

12 *Issue 27 [ITC^DeltaCom No. 3(f)] Should BellSouth be required to*

13 *maintain both the current and the next previous version of an electronic*

14 *interface?*

15

16 Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

17

18 A.   It is BellSouth's understanding that this issue has been resolved by the

19   parties; however, BellSouth reserves the right to file testimony on this

20   issue, should it be further disputed.

21

22 *Issue 28 [ITC^DeltaCom No. 3(g)] Should ITC^DeltaCom have at least 90*

23 *days advance notice prior to BellSouth discontinuing an interface?*

24

1   Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

2

3   A. It is BellSouth's understanding that this issue has been resolved by the

4   parties; however, BellSouth reserves the right to file testimony on this

5   issue, should it be further disputed.

6

7   *Issue 30 [ITC^DeltaCom No. 3(i)] Should BellSouth be required to*

8   *maintain UNE/LCSC hours from 6 a.m. – 9 p.m.?*

9

10 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12 A. BellSouth should not be required to change its hours for the Unbundled

13   Network Elements Center ("UNEC" or "UNE Center") or for the Local

14   Carrier Service Center ("LCSC"), because the hours BellSouth currently

15   offers are more than adequate to meet the needs of all ALECS.   The

16   hours offered by BellSouth are based on demand and costs. BellSouth

17   monitors workloads at the UNEC and LCSC, and is aware of the most

18   popular times of the day for LSRs to arrive.

19

20 Q. WHEN IS THE UNEC OPEN?

21

22 A. There are two locations of the UNEC: Tucker, Georgia and

23   Birmingham, Alabama. The UNEC is open for the provisioning of

24   designed functions Monday through Friday from 8:00 a.m. to 5:00 p.m.

25   local time. The UNEC is open for the provisioning of non-designed

1 functions Monday through Saturday from 8:00 a.m. to 5:00 p.m. local

2 time. Other hours may be arranged with ALECs on a case-by-case

3 basis for an additional fee. In addition, the UNEC provides

4 maintenance support 24 hours a day, 7 days a week.

5

6 Q. WHEN IS THE LCSC OPEN?

7

8 A. There are two locations of the LCSC: Atlanta, Georgia and Birmingham,

9 Alabama. The hours for the LCSC are currently 24 hours a day, 7 days

10 a week, however, these hours soon will be changed to Monday through

11 Saturday from 6:00 a.m. to midnight eastern time. The change is being

12 made so that the hours will be equivalent with BellSouth's retail hours.

13 Additionally, most of BellSouth's systems are down after midnight for

14 maintenance and updates.

15

16 *Issue 31 [ITC^DeltaCom No. 3(j)] Should BellSouth be required to*

17 *provide a toll free number to ITC^DeltaCom to answer questions*

18 *concerning BellSouth's OSS proprietary interfaces from 8 a.m. to 8 p.m.?*

19

20 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

21

22 A. It is BellSouth's understanding that this issue has been resolved by the

23 parties; however, BellSouth reserves the right to file testimony on this

24 issue, should it be further disputed.

25

1   *Issue 32 [ITC^DeltaCom No. 3(k)] What information should be included in*

2   *the Firm Order Confirmation (FOC)?*

3

4   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

5

6   A.   It is BellSouth's understanding that this issue has been resolved by the

7   parties; however, BellSouth reserves the right to file testimony on this

8   issue, should it be further disputed.

9

10 *Issue 34 [ITC^DeltaCom No. 3(m)] What type of repair information should*

11 *BellSouth be required to provide to ITC^DeltaCom such that*

12 *ITC^DeltaCom can keep the customer informed?*

13

14 Q.   HOW DOES ITC^DELTACOM STATE ITS POSITION ON THIS ISSUE

15   IN ITS PETITION?

16

17 A.   ITC^DeltaCom states that : "BellSouth should be required to provide all

18   information needed to allow ITC^DeltaCom to enter a customer trouble

19   ticket into the BellSouth system, retrieve and track current status on all

20   ITC^DeltaCom trouble and repair tickets, receive an estimated time to

21   repair on a real-time basis, and other related repair functions in

22   Attachment 6, Sections 5.3 through 5.3.2."

23

24 Q.   PLEASE COMMENT ON ITC^DELTACOM'S POSITION.

25

1   A.   First, BellSouth does not understand what ITC^DeltaCom means when

2   it states that "BellSouth should be required to provide all information

3   needed to allow ITC^DeltaCom to enter a customer trouble ticket into

4   the BellSouth system." Although BellSouth offers nondiscriminatory

5   electronic interfaces for ALECs to use to enter trouble information into

6   BellSouth maintenance and repair OSS, it is certainly ITC^DeltaCom's

7   responsibility to gather this trouble information from its end user

8   customers to enter into the interface, not BellSouth's.

9

10   Second, BellSouth is unsure of ITC^DeltaCom's actual position on this

11   issue. ITC^DeltaCom's statement of its position in the Petition is

12   different than the language which ITC^DeltaCom has proposed in

13   Attachment 6 of its draft interconnection agreement.

14

15   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

16

17   A.   BellSouth's position is that it provides ITC^DeltaCom and the other

18   ALECs with non-discriminatory access to its maintenance and repair

19   OSS by providing TAFI and the ECTA Gateway. Among other things,

20   these interfaces allow ITC^DeltaCom and other ALECs to enter

21   customer trouble tickets into the BellSouth system, retrieve and track

22   current status on all ITC^DeltaCom trouble and repair tickets, and

23   receive an estimated time to repair on a real-time basis. BellSouth also

24   offers manual interfaces to its maintenance and repair OSS. Once it

25   has been determined that a trouble requires a dispatch, no distinction is

1   made in priority between tickets related to ALEC customers versus

2   tickets related to BellSouth retail customers.

3

4   Q.   PLEASE DESCRIBE THE TAFI INTERFACE.

5

6   A.   ALEC TAFI is the same maintenance and trouble repair system used by

7   BellSouth's own retail representatives for non-designed services,

8   except that it combines functionality for both residential and business

9   services, while BellSouth must use separate TAFI interfaces for its

10   residential and business retail units. TAFI is a user-friendly human-to-

11   machine interface that often enables trouble reports to be cleared

12   remotely by the repair attendant handling the initial customer contact,

13   frequently with the customer still on the line. This is possible because

14   TAFI correctly screens 80% of the reports for non-designed services

15   while the customer is on the line. BellSouth and ALECs can use TAFI

16   to check the status of repair tickets and to view end user customer's

17   maintenance histories.

18

19   Although TAFI is not a national standard interface, BellSouth made

20   TAFI available to ALECs so that they would have nondiscriminatory

21   access since BellSouth also uses TAFI. The national standard for

22   repair and maintenance interfaces addresses only functions such as

23   electronically opening a trouble ticket or obtaining status information.

24

25   Q.   DOES ITC^DELTACOM USE TAFI?

25

1

2   A.   Yes.

3

4   Q.   DOES BELLSOUTH ALSO OFFER A NATIONAL STANDARD

5   ELECTRONIC INTERFACE FOR MAINTENANCE AND REPAIR?

6

7   A.   Yes. BellSouth has provided ALECs with ECTA. ECTA uses the

8   T1/M1 national standard for local exchange trouble reporting and

9   notification. This machine-to-machine interface provides access to the

10   BellSouth's maintenance OSS supporting both telephone-number and

11   circuit-identified services - i.e., designed and non-designed services. It

12   supports both resold services and UNEs. Because it follows the

13   national standard for local exchange trouble reporting and notification,

14   the following functions are available to users of ECTA: the ability to

15   enter a report; the ability to modify a report; the ability to obtain status

16   information during the life of the report; and the ability to cancel a

17   report.

18

19   Q.   DOES BELLSOUTH PROVIDE THE REPAIR INFORMATION

20   REQUIRED TO ENABLE ITC^DELTACOM TO KEEP THEIR

21   CUSTOMER INFORMED?

22

23   A.   Yes. As I've shown above, BellSouth provides ITC^DeltaCom with non-

24   discriminatory access to its maintenance and repair OSS by providing

25   TAFI and ECTA Gateway. Among other things, these interfaces allow

1   ALECs to enter customer trouble tickets into the BellSouth system,

2   retrieve and track current status on all trouble and repair tickets, and

3   receive an estimated time to repair on a real-time basis.

4

5   *Issue 38 [ITC^DeltaCom No. 6(a)] What charges, if any, should BellSouth*

6   *be permitted to impose on ITC^DeltaCom for BellSouth's OSS?*

7

8   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

9

10   A.   It is BellSouth's position that it may recover its costs for its OSS from

11   ITC^DeltaCom and the other ALECs. The details of BellSouth's

12   position are provided by Mr. Al Varner in his direct testimony. I,

13   however, address ITC^DeltaCom's statement in its position that

14   "BellSouth's systems do not currently provide resold services or

15   unbundled network elements in a nondiscriminatory manner."

16

17   Q.   DO YOU DISAGREE WITH ITC^DELTACOM'S STATEMENT ABOUT

18   THE ELECTRONIC INTERFACES TO BELLSOUTH'S OSS?

19   A.   BellSouth does not agrees with ITC^DeltaCom's statement. As

20   previously stated, BellSouth currently provides the following

21   nondiscriminatory electronic interfaces to its OSS for ALECs: LENS for

22   pre-ordering, ordering, and provisioning for simple resale services; TAG

23   for pre-ordering, ordering, and provisioning for simple resale services

24   and seven unbundled network elements; EDI for ordering and

25   provisioning of simple resale services and seven unbundled network

27

1   elements; TAFI for maintenance and repair; ECTA for maintenance and

2   repair; and ODUF, EODUF, and ADUF for billing. BellSouth also offers

3   ALECs manual interfaces to its OSS. These interfaces allow ALECs to

4   perform the functions of pre-ordering, ordering, provisioning,

5   maintenance and repair, and billing for UNEs and resold services in

6   substantially the same time and manner as BellSouth does for itself.

7

8   Q.   DOES THIS CONCLUDE YOUR TESTIMONY?
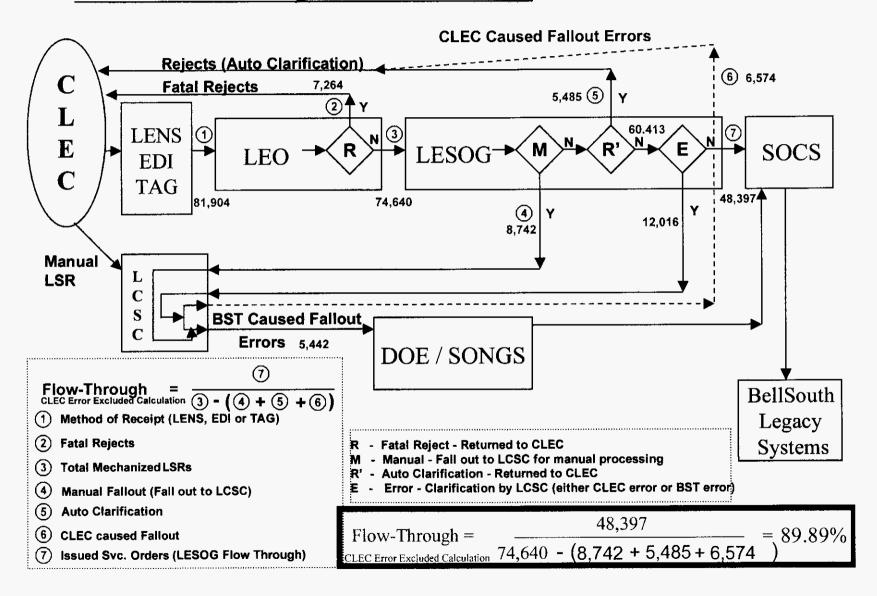
9

10   A.   Yes.

REPORT: PERCENT FLOW THROUGH SERVICE REQUESTS (DETAIL)

REPORT PERIOD: 01/1/1999 - 01/31/1999

1. AGGREGATE ORDER TYPES

| Company Info | | LSR SUBMISSION | | | | | LSR PROCESSING | | | | | | | FLOWTHROUGH * | |
Name	RESH/ OCN	FATAL REJECTS	LEO Mechanized Interface Used LENS	EDI	TAG	Total Mech LSR's	Manual Total Manual Fallout	Rejects Auto Clarification	Validated LSR's	Errors * Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Base Calculation	CLEC Error Excluded Calculation
# 1		0	21	0	0	21	1	1	19	1	1	0	18	94.74%	94.74%
# 2		0	36	0	0	36	5	2	29	15	14	1	14	48.28%	50.00%
# 3		0	114	0	0	114	6	8	100	14	11	3	86	86.00%	88.66%
# 4		0	175	0	0	175	25	16	134	20	20	0	114	85.07%	85.07%
# 5		0	179	0	0	179	17	19	143	10	10	0	133	93.01%	93.01%
# 6		0	454	0	0	454	39	67	348	82	76	6	266	76.44%	77.78%
# 7		9	2098	0	0	2098	530	102	1466	109	94	15	1357	92.56%	93.52%
# 8a		0	267	0	0	267	6	32	229	77	63	14	152	66.38%	70.70%
# 8b		0	0	15	0	15	0	13	2	2	1	1	0	0.00%	0.00%
# 9		5	1143	0	0	1143	70	113	960	74	61	13	886	92.29%	93.56%
# 10		0	15	0	0	15	4	5	6	6	6	0	0	0.00%	0.00%
# 124		0	108	0	0	108	14	9	85	7	6	1	78	91.76%	92.86%
# 125		0	81	0	0	81	27	7	47	15	15	0	32	68.09%	68.09%
# 126		0	15	0	0	15	3	0	12	4	4	0	8	66.67%	66.67%
# 127		0	2	0	0	2	0	1	1	0	0	0	1	100.00%	100.00%
# 128		0	134	0	0	134	11	68	55	31	30	1	24	43.64%	44.44%
# 129		0	9	0	0	9	3	0	6	0	0	0	6	100.00%	100.00%
# 130		0	290	0	0	290	10	24	256	34	32	2	222	86.72%	87.40%
# 131		0	25	0	0	25	2	1	22	1	1	0	21	95.45%	95.45%
# 132		0	642	0	0	642	7	71	564	46	44	2	518	91.84%	92.17%
# 133		0	8	0	0	8	6	1	1	1	1	0	0	0.00%	0.00%
LENS Subtotal		43	53779	0	0	53779	5720	3246	44813	5186	4783	403	39627	88.43%	89.23%
EDI Subtotal		7221	0	20861	0	20861	3022	2239	15600	6830	659	6171	8770	56.22%	93.01%
TOTAL INTERFACES		7264	53779	20861	0	74640	8742	5485	60413	12016	5442	6574	48397	80.11%	89.89%

CLEC Ordering Process Flow

CLEC Caused Fallout Errors

Rejects (Auto Clarification)

Fatal Rejects 7,264

② Y   5,485 ⑤ Y   ⑥ 6,574

60.413

LENS EDI TAG ① → LEO → R N ③ → LESOG → M N → R' N → E N ⑦ → SOCS

81,904   74,640   48,397

④ Y   Y
8,742   12,016

Manual LSR

L C S C

BST Caused Fallout Errors 5,442

DOE / SONGS

BellSouth Legacy Systems

$$\text{Flow-Through} = \frac{⑦}{③ - (④ + ⑤ + ⑥)}$$
CLEC Error Excluded Calculation

① Method of Receipt (LENS, EDI or TAG)
② Fatal Rejects
③ Total Mechanized LSRs
④ Manual Fallout (Fall out to LCSC)
⑤ Auto Clarification
⑥ CLEC caused Fallout
⑦ Issued Svc. Orders (LESOG Flow Through)

R - Fatal Reject - Returned to CLEC
M - Manual - Fall out to LCSC for manual processing
R' - Auto Clarification - Returned to CLEC
E - Error - Clarification by LCSC (either CLEC error or BST error)

$$\text{Flow-Through} = \frac{48,397}{74,640 - (8,742 + 5,485 + 6,574)} = 89.89\%$$
CLEC Error Excluded Calculation

CLEC: Complex Services - MultiServ

CLEC SUBMITS LSR TO ICS ACCOUNT TEAM

Account Team LSR REVIEW completeness and accuracy

Account Team ISSUES EOMS SERVICE INQUIRY for MultiServ

REVIEW DEPT RESPONSES ON SERVICE INQUIRY

Account Team HAND OFF PACKAGE for Service Center

Cust Service Asst (CSA) RETRIEVES FIRM ORDER accurate & complete

CSA - ORDER ENTRY INTO DOE for MultiServ

SOCS

CSA - SENDS FOC TO ACCOUNT TEAM

Account Team SENDS FOC TO CLEC

CSA - NOTIFIES ICS PROJECT MGR OF PENDING REQUEST

ICS PROJECT MGR
- Verifies order for accuracy
- Verifies personnel are assigned
- Identifies self in WFA log notes
- Monitors critical dates assigned & coordinates problem resolution
- Notifies CLEC if due dates in jeopardy

ON DUE DATE ICS Project Mgr notifies CLEC when order activity is complete

= Shade Indicates Manual Processing

BST RETAIL: Complex Services - MultiServ

Request for Proposal from end user customer

Account Executive PROPOSAL PREPARATION

Cust Ops Project Mgr REVIEW & ASSIGN to Service Consultant

Cust Service Asst (CSA) RETRIEVES FIRM ORDER FM MAC accurate & complete

QUICK QUOTE Sales Quotation System

PROPOSAL PRESENTATION to End User Customer

Service Consultant (SC) ISSUES EOMS SERVICE INQUIRY for MultiServ

CSA - ORDER ENTRY INTO DOE for MultiServ

ORION Address Validation

SIGNED CONTRACT from End User Customer

SC - REVIEWS DEPT RESPONSES ON SERVICE INQUIRY

SOCS

RSAG

HAND OFF PACKAGE to Customer Ops Project Manager

SC - ISSUES FIRM ORDER to Major Acct Center (MAC)

CSA - PROJECT COORD. / FOC with AE, SC & end user customer

SC - PROJECT COORD. / FOC with AE & end user customer

[shaded box] = Shade Indicates Manual Processing