1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   REBUTTAL TESTIMONY OF RONALD M. PATE

3   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4   DOCKET NO. 981052-TP

5   DECEMBER 21, 1998

6

7   Q.   PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH

8   BELLSOUTH TELECOMMUNICATIONS, INC.

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. My

14   business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

15

16 Q.   PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

17

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

19   1973, with a Bachelor of Science Degree. In 1984, I received a Masters of

20   Business Administration from Georgia State University. My professional

21   career spans over twenty-five years of general management experience in

22   operations, logistics management, human resources, sales and marketing.

23   I joined BellSouth in 1987, and have held various positions of increasing

24   responsibility in both BellSouth's regulated and non-regulated entities.

1

2   Q.   HAVE YOU TESTIFIED PREVIOUSLY?

3

4   A.   Yes. I have testified before the Louisiana Public Service Commission.

5

6   Q.   HAVE YOU TESTIFIED PREVIOUSLY BEFORE THIS COMMISSION?

7

8   A.   No.

9

10   Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED

11   TODAY?

12

13   A.   The purpose of my testimony is to rebut the direct testimony filed by

14   Andrea K. Welch of the Telephone Company of Central Florida ("TCCF").

15   Specifically, I will address Operations Support Systems issues.

16

17   Q.   HAS BELLSOUTH PROVIDED TCCF WITH ELECTRONIC INTERFACES

18   WHICH ENABLE TCCF TO ORDER RESALE SERVICES?

19

20   A.   Yes. Contrary to Ms. Welch's statement on page 9 of her testimony that

21   such electronic interfaces do not exist, BellSouth has made a variety of

22   electronic interfaces available to ALECs for the pre-ordering and/or

23   ordering of resale services. These interfaces are: the

24   Telecommunications Access Gateway ("TAG", formerly known as API"),

1   Electronic Data Interchange ("EDI"), the Local Exchange Negotiation

2   System ("LENS"), and EC-Lite.

3

4 Q.   ON PAGE 12 OF HER TESTIMONY, MS. WELCH DESCRIBES THE

5   ELECTRONIC OSS INTERFACES THAT BELLSOUTH HAS OFFERED

6   TO TCCF (TAFI, EDI, LENS, AND TAG). ARE HER DESCRIPTIONS OF

7   THESE INTERFACES CORRECT?

8

9 A.   No. It is clear from Ms. Welch's descriptions that TCCF does not

10   understand the purpose of the electronic interfaces that BellSouth offers to

11   ALECs. I will discuss each of these interfaces and explain why TCCF's

12   assessment of them is incorrect.

13

14 Q.   MS. WELCH, ON PAGES 12 AND 13, STATES THAT THE TROUBLE

15   ANALYSIS AND FACILITATION INTERFACE ("TAFI") DOES NOT

16   PROVIDE FOR "ORDER FLOW THROUGH." WHAT IS THE PURPOSE

17   OF THE TAFI INTERFACE?

18

19 A.   TAFI is an interface for repair and maintenance functions, not ordering.

20

21 Q.   MS. WELCH STATES, ON PAGE 12, THAT MANUAL INTERVENTION IS

22   REQUIRED WHEN USING TAFI. DO YOU UNDERSTAND HER

23   COMPLAINT?

24

1   A.   No. TAFI is a user-friendly interface that often enables trouble reports to

2   be cleared remotely by the repair attendant handling the initial customer

3   contact, frequently with the customer still on the line. With this system,

4   any repair attendant, including an ALEC's repair attendant, can correctly

5   handle a trouble report on any telephone number-based service. When

6   using TAFI, an ALEC repair attendant must interact with the end-user

7   customer and with TAFI, which is an interactive system, and enter

8   information and respond to the system as necessary. Because TAFI

9   interacts with downstream systems, without manual intervention, I do not

10   understand what Ms. Welch means when she states that TAFI requires

11   manual intervention.

12

13   I should also mention that TAFI is the same system used by BellSouth's

14   retail repair attendants. By offering TAFI to ALECs, BellSouth is providing

15   ALECs with the same access to repair and maintenance OSS that

16   BellSouth retail has.

17

18   Q.   PLEASE DESCRIBE HOW TAFI WORKS.

19

20   A.   TAFI is a common presentation expert system (a human-to-machine

21   interface with intelligence to do diagnostics) that provides rapid,

22   consistent, and efficient automated trouble receipt, screening, and

23   problem resolution. It is an interactive system that prompts the repair

24   attendant with questions and instructions while automatically interacting

1   with other internal systems as appropriate. TAFI also provides for the

2   queuing of reports to enable the repair attendant to work on several

3   customer troubles simultaneously, and it provides on-line reference tools.

4   TAFI can also be used to view maintenance histories. TAFI gives ALECs

5   direct access to each ALEC's end-user customers' maintenance histories.

6   If TAFI determines that a trouble report must be dispatched to a

7   downstream center or field work group, TAFI passes the trouble ticket to

8   the Line Maintenance Operating System (LMOS), which dispatches the

9   trouble report to the appropriate Installation & Maintenance (I&M) work

10   group. If the ticket needs to be handled by a Central Office (CO) field

11   work group, LMOS passes the ticket to the Work Force Administration

12   (WFA) - Dispatch In module, which loads the ticket to the next available

13   CO technician. No distinction is made in priority between tickets related to

14   ALEC customers versus tickets related to BellSouth retail customers.

15

16   Q.   MS. WELCH COMPLAINS, ON PAGES 12 AND 13, THAT TAFI IS

17   SLOWER AND LESS EFFECTIVE THAN MANUAL PROCESSES FOR

18   TROUBLE TICKETS. PLEASE COMMENT.

19

20   A.   Because Ms. Welch does not describe the processes used by TCCF, I

21   cannot comment specifically about TCCF's complaints. If TCCF's

22   business plan is simply to open and close trouble tickets for its customers,

23   then perhaps TCCF's current process is the most effective for it. If TCCF

24   is interested in doing more, for example, diagnosing many of its

1   customers' troubles while the customers are on the telephone, or in

2   tracking trouble tickets or viewing customers' trouble histories on-line, then

3   it should consider TAFI.

4

5 Q. ON PAGE 12, MS. WELCH STATES THAT EDI DOES NOT PROCESS

6   ORDERS WITH MORE THAN SIX LINES AND DOES NOT PROCESS

7   "ADDS, MOVES OR CHANGES." SHE ALSO STATES ON PAGE 16

8   THAT TCCF BELIEVES THAT BELLSOUTH DOES NOT CURRENTLY

9   OFFER ELECTRONIC INTERFACES THAT PROCESS "ADDS, MOVES

10   AND CHANGES." ARE THESE STATEMENTS CORRECT?

11

12 A. No. EDI, the industry standard, machine-to-machine interface offered to

13   ALECs, has always been able to process orders with more than six lines

14   and "adds, moves or changes" for orders. These functions also became

15   available via the TAG on November 1, 1998. Perhaps, Ms. Welch has

16   confused EDI with LENS. It is true that LENS currently does not process

17   orders with more than six lines (with the exception of "switch as is" orders)

18   or "adds, moves or changes."

19

20 Q. MS. WELCH ALSO STATES THAT EDI DOES NOT PROCESS ANY

21   COMPLEX ORDERS. DOES EDI SUPPORT THE ORDERING OF ANY

22   COMPLEX SERVICES?

23

1   A.   Yes, and these services may also be ordered via TAG. There are four

2   complex services that ALECs may order via the EDI or TAG electronic

3   interfaces: PBX trunks, SynchroNet® (a private line data service), ISDN-

4   Basic-Rate service, and hunting.

5

6   In addition, an ALEC may use the EDI, TAG, or LENS interfaces to place

7   a resale order for any complex service, with any number of lines, as long

8   as the end-user simply is "switching-as-is" from BellSouth to an ALEC.

9   Other than the four complex services available via EDI and TAG and

10   "switch-as-is" services, complex services requiring account team handling

11   are handled in substantially the same manner for both ALEC and

12   BellSouth retail customers.

13

14 Q.   YOU MENTIONED THAT SOME COMPLEX SERVICES REQUIRE

15   ACCOUNT TEAM HANDLING. PLEASE EXPLAIN HOW THESE

16   SERVICES ARE HANDLED FOR BELLSOUTH AND FOR ALECS.

17

18 A.   Non-discriminatory access does not require that all information and

19   functions be electronic and involve no manual handling. Many services,

20   primarily complex services, involve substantial manual handling by

21   BellSouth account teams for BellSouth retail customers. Thus, non-

22   discriminatory access to certain functions for ALECs may also legitimately

23   involve manual processes for these same functions.

24

1   ordering and ordering processes are largely manual. Nonetheless, these

2   manual pre-ordering and ordering processes are substantially the same

3   for both retail and ALEC orders. Orders for retail services are handled

4   primarily by the appropriate business unit for retail services -- BellSouth

5   Business Systems (BBS) account teams. Orders for ALEC services are

6   handled by the appropriate business unit for ALEC services – ALEC

7   account teams which are part of Interconnection Services (ICS). ICS's

8   account team handling of complex services for ALECs is substantially the

9   same as BBS's account team handling of complex services for BellSouth's

10   retail customers; they both use the substantially same processes as

11   described below.

12

13 Q.   COULD YOU ILLUSTRATE HOW THESE PROCESSES ARE

14   SUBSTANTIALLY THE SAME?

15

16   Yes. Attached are Exhibits RMP-1 and RMP-2 which depict the

17   processes for ordering MultiServ, a complex services offering, for ALECs

18   and for BellSouth. To perform the pre-ordering activity for complex

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

20   appropriate BBS or ICS account team fills out an extensive paper form

21   and then provides that form to the project manager for further manual

22   activities. On approval of either the retail customer or the ALEC, as

23   appropriate, the paper service inquiry is re-initiated as a firm order, which

24   also is an extensive paper form with subsequent manual distribution. In

1   both the retail and the resale cases, the Firm Order Package is manually

2   handed off to the service center, where paper service order worksheets

3   are created to assist in initiating service orders in the ordering system. At

4   that point, orders are typed into the appropriate service order system for

5   the customer's location, either the Direct Order Entry ("DOE") system (in

6   North Carolina, South Carolina, Georgia, and Florida) or the Service Order

7   Negotiation System ("SONGS") in Alabama, Kentucky, Louisiana,

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

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

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

11   order in BellSouth's systems never has any contact with the end-user

12   customer, whether the customer belongs to an ALEC or BellSouth. After

13   the service order is input, the account team and project manager are

14   notified by e-mail of the service order numbers and due dates. The

15   account team manually reviews the service order for accuracy and follows

16   up as necessary. These processes, with their substantial reliance on

17   manual handling and paper forms, are common to both retail and ALEC

18   orders.

19

20   Q.   IF AN ALEC WANTED TO PURSUE THE MECHANIZATION OF

21   COMPLEX ORDERS, WHAT AVENUES DOES IT HAVE?

22

23   A.   If any ALEC, in exercising its independent business judgment, were to

24   reach a different conclusion regarding the costs and benefits of

1   mechanization, it could fund the cost of complex service mechanization

2   through a bona fide request for additional functionality. Another way for

3   an ALEC to suggest the addition of a complex service or complex services

4   to an electronic interfaces is through the Electronic Interface Change

5   Control Process ("EICCP"). This process was established by BellSouth

6   and the ALECs. Generally, an ALEC, registered to participate in the

7   Electronic Interface Change Control Process, may propose changes to the

8   electronic interfaces. Part of the process includes a vote or votes by the

9   participating ALECs to establish the priority of the potential changes. A

10 participating ALEC must be a user of an interface in order to vote and rank

11 the potential change(s) for that particular interface. A third way for an

12 ALEC to suggest changes, such as the addition of complex services to an

13 electronic interface, is via the Ordering and Billing Forum, which sets the

14 standards for ordering.

15

16 In addition to the processes described above, BellSouth has implemented

17 e-mail service inquiries and ordering for one type of complex service,

18 frame relay, with two ALECs. BellSouth is ready to accept requests from

19 other ALECs for trials for other specific products.

20

21 Q. ARE THE ALECS PARTICIPATING IN THE EICCP CONSIDERING

22   CHANGES TO THE ELECTRONIC INTERFACES THAT WOULD

23   INCLUDE FUNCTIONALITY FOR COMPLEX SERVICE ORDERING?

24

1 A. Yes. The ALECs involved in the EICCP have determined which of the

2   functionality and features from versions 8.0, 9.0, and 10.0 of the Ordering

3   and Billing Forum ("OBF") standards will be included in a major release of

4   the interfaces in July, 1999. The first standards for complex services are

5   part of version 9.0 of the OBF standards.

6

7 Q. IS TCCF A REGISTERED MEMBER OF THE EICCP?

8

9 A. Yes.

10

11 Q. ON PAGES 12-13, MS. WELCH EXPLAINS THAT "ORDER FLOW

12   THROUGH IS ACHIEVED WHEN A HUMAN KEYS RELEVANT ORDER

13   INFORMATIONA INTO BLANKS ON AN ORDERING SCREEN, PUSHES

14   A BUTTON, AND THE ORDER IS RECEIVED, PROCESSED AND

15   TURNED VIA MACHINE. THE PROCESS IS MACHINE-TO-MACHINE

16   AFTER INITIAL INPUT OF THE ORDER." DO YOU AGREE WITH

17   TCCF'S DEFINITION OF FLOW THROUGH?

18

19 A. Yes, but with one significant exception. An order can be said to flow

20   through an electronic ordering system only when an ALEC or BellSouth

21   representative takes information directly from the customer and inputs it

22   directly into the electronic ordering interface without any changes or

23   manipulation of the customer's information.

24

1   Earlier in my testimony, I discussed how complex orders for ALECs and

2   BellSouth are handled in substantially the same time and manner. In the

3   case of complex orders, such as ESSX®, there are systems designers

4   and consultants involved in the work flow between the ALEC or BellSouth

5   representative who takes the order and the person who inputs the order

6   into the system. These designers and consultants clarify and expand on

7   the information from the end user customer as necessary to prepare the

8   order for input . Therefore, complex orders cannot be said to flow through

9   because there is significant manual handling, which varies from order to

10   order, between the time order information is taken by the ALEC or

11   BellSouth representative and before the order is input.

12

13   Flow through for ALEC orders can be said to "start" when an

14   electronically-submitted order reaches BellSouth and flows through the

15   edit checking and service order generation systems and reaches the

16   Service Order Control System ("SOCS") without any human intervention.

17

18   Q.   MS. WELCH, ON PAGES 12 AND 13, STATES THAT "EDI DOES NOT

19   PROVIDE FOR ORDER FLOW THROUGH" THAT "ORDER FLOW

20   THROUGH CANNOT BE ACHIEVED USING EDI", AND THAT "ORDER

21   FLOW THROUGH CANNOT BE ACHIEVED WITH THE EXISTING OSS."

22   ARE THESE STATEMENTS CORRECT?

23

1   A.   No. EDI, TAG, and LENS provide mechanized order generation for 30

2   resale services. EDI and TAG also provide mechanized order generation

3   for 4 UNEs available. "Mechanized order generation" means that all

4   aspects of order generation - including firm order confirmations and

5   completion notices - are fully mechanized for these services. These

6   orders will flow through EDI, TAG, or LENS and into BellSouth's systems

7   without any manual intervention if the orders are complete and correct.

8

9   Q.   CAN LENS BE USED ONLY FOR PRE-ORDERING, AS MS. WELCH

10   STATES ON PAGE 12, AND THEN AGAIN, ON PAGE 13?

11

12 A.   No. As I have already indicated, LENS may be used for ordering as well,

13   and has been available for that purpose since it was introduced in April,

14   1997. Since TCCF uses LENS for pre-ordering, as Ms. Welch comments

15   on page 13 of her testimony, I am surprised that TCCF has not noticed

16   that there is a firm order mode "link" on the LENS Main Menu screen (the

17   first screen seen after the ALEC user logs in).

18

19 Q.   MS. WELCH STATES THAT, ON NOVEMBER 1, 1998, THAT TAG WAS

20   INTRODUCED FOR PRE-ORDERING ONLY. IS THIS TRUE?

21

22 A.   No. Pre-ordering via TAG became available on August 31, 1998.

23   Ordering became available on November 1, 1998.

24

1 Q. ON PAGE 12 OF HER TESTIMONY, MS. WELCH STATES THAT TAG

2   WILL REPLACE EDI AND LENS? PLEASE COMMENT.

3

4 A. TAG is not a replacement for EDI, which is one of BellSouth's industry-

5   standard, machine-to-machine interfaces for ordering for ALECs. TAG

6   provides machine-to-machine pre-ordering and ordering interfaces based

7   on the CORBA standard, which BellSouth believes will likely be the single

8   long-term standard for pre-ordering. Since TAG is a machine-to-machine

9   interface, an ALEC that chooses to use TAG must build its side of the

10   interface.

11

12   LENS continues to be available to ALECs. LENS will be upgraded in 1999

13   to add significant additional functionality.

14

15 Q. ON PAGE 15, MS. WELCH QUESTIONS WHY BELLSOUTH HAS NOT

16   MADE ITS OSS FOR ORDERING, RNS, DOE, AND SONGS,

17   AVAILABLE FOR RESELLERS. PLEASE COMMENT.

18

19 A. Contrary to TCCF's suggestion, giving the ALECs access to the Regional

20   Negotiation System ("RNS"), Direct Order Entry ("DOE") system, and

21   Service Order Negotiation System ("SONGS") for their orders would not

22   have been the "quickest and most efficient solution" for BellSouth or

23   ALECs.

24

1   There are several problems with TCCF's suggestion. First, the

2   Telecommunications Act of 1996 does not require identical access, but

3   rather non-discriminatory access. Second, as Ms. Welch notes, BellSouth

4   does not have a single system that it uses for its own customers. As she

5   describes on pages 14 and 15 of her testimony, BellSouth uses three

6   different systems for ordering: RNS for residential customers throughout

7   BellSouth's region; DOE for business customers in Florida, Georgia, North

8   Carolina, and South Carolina; and SONGS for Alabama, Kentucky,

9   Louisiana, Mississippi, and Tennessee. DOE and SONGS also are used

10 for certain types of residential transactions that RNS does not process.

11 Thus, if ALECs were to use the "same interfaces" as BellSouth, they

12 would have to implement three different interfaces to place orders in

13 BellSouth's region, instead of just one pre-ordering interface and one

14 ordering interface, which can be integrated -- or just one interface if LENS

15 is used for pre-ordering or ordering -- for the entire region.

16

17 TCCF, via Ms. Welch's testimony on page 15, "does not understand why

18 BellSouth has chosen not to use [RNS, DOE, and SONGS] for the

19 processing of reseller orders." One reason is that these systems would

20 not support all types of ALEC resale orders. For example, RNS does not

21 support the most basic types of ALEC resale orders, "switch-as-is" and

22 "switch-with-changes."

23

1   Another problem with using BellSouth's systems instead of interfaces

2   designed for ALECs would be industry standards. RNS, DOE, and

3   SONGS do not follow the industry standards for ordering, and do not

4   follow the proposals emerging from the industry committee.

5

6   Finally, RNS, DOE, and SONGS were all designed in a manner that suits

7   the vision and business practices of BellSouth, not of ALECs, and contain

8   proprietary information.

9

10   Q.   HAS THIS COMMISSION DEALT WITH A SIMILAR REQUEST BY

11   ANOTHER ALEC?

12

13   A.   Yes. In Docket 980119-TL, Supra Telecommunications & Information

14   Systems, Inc. ("Supra") asked this Commission to order BellSouth to

15   provide Supra with access to BellSouth's retail interfaces. The

16   Commission found that BellSouth should not be "required to provide Supra

17   with the exact same interfaces that [BellSouth] uses for its retail

18   operations."

19

20   Q.   WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

21

22   A.   Yes. Contrary to TCCF's statements, BellSouth has made non-

23   discriminatory electronic interfaces to BellSouth OSS available to TCCF

24   and all other ALECs.

1

2　Q.　　DOES THIS CONCLUDE YOUR TESTIMONY?

3

4　A.　　Yes.

BST RETAIL: Complex Services - MultiServ

Request for Proposal

from end user customer

↓

[dark box]

↓

[dark box]

↕

RSAG

↓

Account Executive PROPOSAL PREPARATION

↓

PROPOSAL PRESENTATION to End User Customer

↓

SIGNED CONTRACT from End User Customer

↓

HAND OFF PACKAGE to Customer Ops Project Manager

Cust Ops Project Mgr REVIEW & ASSIGN to Service Consultant

↓

Service Consultant (SC) ISSUES EOMS SERVICE INQUIRY for MultiServ

↓

SC - REVIEWS DEPT RESPONSES ON SERVICE INQUIRY

↓

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

↓

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

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

↓

[dark box]

↓

[dark box]

↓

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

Color Indicates Manual Processing

BST WHOLESALE: Complex Services - MultiServ

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 - 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

Color Indicates Manual Processing