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BELLSOUTH TELECOMMUNICATIONS, INC.
TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000907-TP
OCTOBER 5, 2000

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. My name is W. Keith Milner. My business address is 675 West
Peachtree Street, Atlanta, Georgia 30375. I am Senior Director -
Interconnection Services for BellSouth Telecommunications, Inc.
("BellSouth"). I have served in my present role since February 1996
and have been involved with the management of certain issues related
to local interconnection, resale, and unbundling.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 30 years and includes responsibilities in
the areas of network planning, engineering, training, administration, and
operations. I have held positions of responsibility with a local exchange
telephone company, a long distance company, and a research and
development company. I have extensive experience in all phases of
telecommunications network planning, deployment, and operation in
both the domestic and international arenas.

1

2 I graduated from Fayetteville Technical Institute in Fayetteville, North
3 Carolina in 1970 with an Associate of Applied Science in Business
4 Administration degree. I later graduated from Georgia State University
5 in 1992 with a Master of Business Administration degree.

6

7 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
8 SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE
9 SUBJECT OF YOUR TESTIMONY.

10

11 A. I testified before the state Public Service Commissions in Alabama,
12 Florida, Georgia, Kentucky, Louisiana, Mississippi, South Carolina, the
13 Tennessee Regulatory Authority, and the Utilities Commission in North
14 Carolina on the issues of technical capabilities of the switching and
15 facilities network regarding the introduction of new service offerings,
16 expanded calling areas, unbundling, and network interconnection.

17

18 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
19 TODAY?

20

21 A. In my testimony, I will set forth BellSouth's position on Issue 5 in this
22 docket.

23

24 **Issue 5: Within what time frame should BellSouth be required to provide**
25 **interconnection trunks in response to orders for new trunk groups or**

1 augmentation orders of 96 trunks or greater? Within what time frame
2 should BellSouth be required to provide interconnection trunks in order
3 to relieve blocking?
4

5 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?
6

7 A. BellSouth will agree to turn up orders for orders of 96 trunks or less that
8 augment existing trunk groups within forty-five (45) days of receipt of
9 the order. However, BellSouth has not agreed to specific intervals for
10 trunk group augmentation quantities greater than 96 or for new trunk
11 groups due to the magnitude and complexity of such projects. For such
12 orders, BellSouth negotiates the turn-up date after a project
13 management review of the pertinent factors involved. Therefore,
14 BellSouth proposes the following contract language:
15

16 "BellSouth will agree to turn up trunk group augmentation orders
17 of 96 trunks or less within forty-five (45) days of receipt of the
18 order. All other orders will have turn up dates as negotiated with
19 BellSouth's Local Interconnection Switching Center (LISC)
20 Project Management Group."
21

22 With regard to trunks ordered to relieve blocking, BellSouth agrees to
23 exert its best efforts to provision such orders as soon as possible.
24 However, BellSouth does not agree that specific intervals are
25 appropriate. Therefore, BellSouth proposes the following contract

1 language:

2

3

“When Level 3 submits an order intended to alleviate an identified blocking problem, BellSouth will exert best efforts to expedite the handling of the order. However, such an order must still bear the standard intervals for the level of service being requested. Level 3 must identify such an order to their assigned Local Interconnection Service Center (LISC) project manager.”

9

10 Q. WHY DOES BELLSOUTH CONTEND THAT ORDERS FOR MORE
11 THAN 96 TRUNKS BE INDIVIDUALLY NEGOTIATED?

12

13 A. While all trunk orders require coordination (both internally and between
14 the parties), those orders requesting greater than 96 trunks especially
15 need coordination and project management due to the size of the
16 orders, the possible need for new construction, potential delays in
17 delivery from manufacturers of the appropriate equipment, and, in some
18 instances, the need to secure building or construction permits from local
19 or state building and highway authorities. Orders of this magnitude
20 often are further dependent on the completion of other major projects
21 such as collocation arrangements, SONET (Synchronous Optical
22 NETWORK) rings, and the like, which may themselves have intervals of
23 90 to 180 days or longer. The project management process assures
24 that all of these factors have been considered so that reliable projected
25 completion dates can be established for use by BellSouth, Level 3 and

1 other Alternative Local Exchange Companies ("ALECs") and end-user
2 customers.

3

4 Q. WHY DOES BELLSOUTH CONTEND THAT ORDERS FOR NEW
5 TRUNK GROUPS SHOULD BE INDIVIDUALLY NEGOTIATED?

6

7 A. New trunk groups may be potentially impacted by many of the same
8 factors that I have just described for trunk group orders of greater than
9 96 trunks. In addition, trunks must be built in the end office or tandem
10 switches. Then a route index must be built, that is, the NPA/NXX
11 codes(s) involved must be routed to the new trunk group. Extensive
12 routing and translations work is required to build the trunks and add
13 features. Finally, the new trunks are subjected to MATV (Mechanized
14 Automated Testing and Verification) testing. The MATV test verifies
15 billing and identifies translations and routing errors.

16

17 Q. DO THE QUARTERLY FORECASTS SUBMITTED BY LEVEL 3 AND
18 OTHER ALECS PERMIT BELLSOUTH TO RESPOND WITHIN THE
19 INTERVALS REQUESTED BY LEVEL 3 IN ITS ARBITRATION
20 REQUEST?

21

22 A. No. The quarterly forecasts provided by Level 3 and other ALECs are
23 useful to BellSouth's network planners to anticipate potential demand,
24 but they do not constitute a financial commitment by the ALECs to order
25 forecasted trunks. BellSouth has used forecast information in its

1 network planning and has been quite successful in provisioning large
2 trunk orders for ALECs within the intervals desired by ALECs, but for
3 the reasons I discussed above, each trunk project must be
4 appropriately evaluated before a firm completion date can be
5 established.

6

7 Q. WHAT IS THE BASIS OF BELL SOUTH'S POSITION THAT A
8 STANDARD INTERVAL SHOULD NOT BE ESTABLISHED?

9

10 A. BellSouth has an established process of working such orders as soon
11 as possible, often within two or three days. However, there is no
12 guarantee that facilities will be available or that other equally urgent
13 work from other ALECs might not also be a matter of consideration.

14

15 Q. DOES A BLOCKING INDICATION MEAN THAT NO CALLS ARE
16 BEING COMPLETED?

17

18 A. No. It must be understood that a blocking indication of itself does not
19 mean that no calls are completing; rather it means that some calls may
20 be blocked - thus necessitating a second call attempt. A blocking
21 indication means that prompt corrective action may be indicated, but
22 the severity of the blockage level (that is, the percentage of calls
23 blocked) may not indicate an emergency situation.

24

1 Q. COULD THE ESTABLISHMENT OF SHORTER INTERVALS FOR
2 ORDERS INVOLVING BLOCKING CREATE AN OPPORTUNITY FOR
3 SOME ALECS TO "GAME" THE PROCESS IN ORDER TO GET
4 SHORTER INTERVALS?

5
6 A. Yes, this is possible though I am in no way suggesting that Level 3
7 would engage in such behavior. As I stated above, BellSouth works
8 such orders as soon as possible on a good faith basis. In situations
9 where repetitive urgent requests from a given ALEC are found to be
10 unwarranted, BellSouth will insist upon standard intervals for that
11 ALEC's orders. If specific shorter intervals for such orders were
12 established, ALECs would potentially be motivated to characterize
13 normal orders as orders related to blocking in order to achieve shorter
14 than normal provisioning intervals in situations where insufficient
15 foresight by the ALECs had been exercised. Given the problematic
16 nature of such short interval orders, BellSouth would potentially be in
17 technical violation of its interconnection agreement were such orders
18 not worked within the short interval. Further, other ALECs and their end
19 users would potentially be discriminated against as a result of the
20 offending ALEC's receiving expedited treatment for its orders.

21
22 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

23
24 A. Yes.