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BELLSOUTH TELECOMMUNICATIONS, INC.
TESTIMONY OF DAVID P. SCOLLARD
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000075-TP
DECEMBER 1, 2000

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

A. I am David P. Scollard, Room 26D3, 600 N. 19th St., Birmingham, AL 35203.
My current position is Manager, Wholesale Billing at BellSouth Billing, Inc., a
wholly owned subsidiary of BellSouth Telecommunications, Inc. In that role, I
am responsible for overseeing the implementation of various changes to
BellSouth's Customer Records Information System ("CRIS") and Carrier
Access Billing System ("CABS").

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Auburn University with a Bachelor of Science Degree in
Mathematics in 1983. I began my career at BellSouth as a Systems Analyst
within the Information Technology Department with responsibility for
developing applications supporting the Finance organization. I have served in a
number of billing system design and billing operations roles within the billing
organization. Since I assumed my present responsibilities, I have overseen the
progress of a number of billing system revision projects such as the

1 implementation of the 1997 Federal Communications Commission ("FCC")
2 access reform provisions, billing of unbundled network elements ("UNEs"), as
3 well as the development of billing solutions in support of new products offered
4 to end user customers. I am familiar with the billing services provided by
5 BellSouth Telecommunications to local competitors, interexchange carriers
6 and retail end user customers.

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8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
9 PROCEEDING?

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11 The purpose of my testimony is to provide the Commission with an
12 understanding of how BellSouth's billing systems separate ISP-bound traffic
13 from non-ISP bound traffic (Issue 8). Specifically, I will describe the processes
14 used by the Carrier Access Billing System ("CABS") to process usage records
15 for calls originating from an Alternative Local Exchange Carrier (ALEC)
16 bound for Internet Service Providers (ISPs) served by BellSouth.

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18 Q. WHAT IS CABS?

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20 A. CABS is a system that BellSouth uses primarily for billing interexchange
21 carriers for services ordered from the FCC and state Access Tariffs. BellSouth
22 also uses CABS to bill ALECs for a number of services such as local
23 interconnection trunking and usage charges, unbundled designed loops and
24 unbundled dedicated interoffice transport. CABS is designed to maintain a
25 record of the access, local interconnection and UNE services that have been

1 provided by BellSouth to IXCs, ALECs and other customers. In addition,
2 CABS processes the massive numbers of call records that are produced in the
3 BellSouth central offices associated with the services provided. For example,
4 when an ALEC sends BellSouth a call across on one of its interconnection
5 trunks, the BellSouth switch to which that trunk interconnects generates a
6 usage record. CABS processes that record and bills the applicable rate
7 elements to the ALEC or other interconnecting carrier based on whether the
8 call is local, intra-LATA toll or inter-LATA. For local calls, reciprocal
9 compensation should be billed and access charges should be billed when the
10 call is a toll call.

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12 Q. WERE THERE ANY CHANGES MADE TO CABS TO SEPARATELY
13 METER OR OTHERWISE SPECIFICALLY HANDLE USAGE RECORDS
14 FOR CALLS BOUND FOR ISPs SERVED BY BELLSOUTH?

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16 A. Yes. In early January 1997 BellSouth began a project to identify methods to
17 separate ISP traffic from non-ISP traffic. The method that was developed and
18 implemented in September 1997 involves a number of steps. First, a search of
19 the Internet is performed to create a list of all telephone numbers that
20 potentially are being used by ISPs for dial up access to the ISP. These
21 telephone numbers are then dialed to verify that the tones returned are
22 consistent with those used for ISP access. The verified numbers are then input
23 to a database accessed by CABS. Each day, as CABS is processing the switch
24 recordings used to bill usage charges for calls originating from the ALEC's end
25 users, the ISP numbers included in the data base are matched against the

1 telephone numbers in the switch recordings. If the matching process identifies
2 a call which is bound for one of the identified numbers it is marked as an ISP
3 call and is treated as such in the billing system.

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5 Q. WERE ON-GOING PROCESSES DEVELOPED TO MAINTAIN THIS
6 CABS CAPABILITY?

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8 A. Yes. A process was put in place to maintain the database of telephone numbers
9 identified as being used by an ISP. This process allowed for new numbers to be
10 added and for numbers to be removed as the ISP's use of them ended. These
11 updates were made on a periodic basis as new information became available.

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13 Q. WHAT INFORMATION WOULD BE REQUIRED BY BELLSOUTH OR
14 OTHER LEC TO VERIFY THAT USAGE CHARGES WERE BILLED
15 CORRECTLY?

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17 A. Each LEC receiving a bill containing usage charges for traffic exchanged with
18 another local provider would need information sufficient to independently
19 verify that the billing LEC applied the appropriate rate elements to the correct
20 number of minutes. In the case of ISP traffic, the billed LEC would need to be
21 able to determine that the billing LEC accurately identified the total ISP
22 minutes from other minutes. BellSouth's position is that the most effective way
23 to accomplish this is for the billing LEC to provide the billed LEC a list of the
24 ISP numbers that was used in calculating the charges contained on the bill. In

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1 that way, the billed company would be able to use its own switch records to
2 verify that the appropriate charges have been calculated.

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4 Q. HAS BELLSOUTH BEEN SUCCESSFUL IN ACQUIRING THE NEEDED
5 DATA FROM ALECS WHICH CURRENTLY BILL FOR ISP TRAFFIC?

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7 A. For the most part, BellSouth has not been able to obtain the ISP numbers used
8 by ALECs in generating bills sent to BellSouth. Because of this, BellSouth
9 uses a method by which the ISP traffic is estimated by studying the average
10 duration of calls bound for an ALEC's end users and attempts to isolate the ISP
11 traffic using the call characteristics of the studied calls. The estimate is used to
12 compare to the bills sent by the ALECs to determine whether or not the bill is
13 accurate. A more effective process would be for the ALECs to be required to
14 provide BellSouth with the ISP numbers so that actual traffic records could be
15 used.

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17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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19 A. Yes.

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