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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF GLORIA CALHOUN
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 961150-TP
NOVEMBER 1, 1996

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

A. My name is Gloria Calhoun. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth Telecommunications, Inc. as a Director in the Strategic Management Unit. In that position I handle responsibilities associated with operations planning for local competition.

Q. Are you the same Gloria Calhoun who previously filed testimony in this proceeding?

A. Yes.

Q. What is the purpose of your testimony?

A. I will address issues in the direct testimony of Sprint's Mr. Key on electronic interfaces, and also on carrier billing. Specifically, given that there are no industry standards for interfaces for some functions,

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OTH _____

1 **Sprint's simultaneous requests -- for industry standard interfaces and**
2 **for interfaces available by January 1, 1997 -- are mutually exclusive for**
3 **those functions. As I have detailed in my direct testimony, BellSouth**
4 **already has provided, or has under active development, electronic**
5 **interfaces for each of the areas requested by Sprint, including pre-**
6 **ordering, ordering and provisioning, maintenance and repair, and**
7 **billing. BellSouth's interfaces are consistent with the FCC's First**
8 **Report and Order in CC Docket No. 96-98 ("FCC order").**

9
10 **Florida law, as well as the FCC order, supports BellSouth's position**
11 **that direct, on-line access to customer service records is not**
12 **appropriate. Finally, the Commission should not impose a CABS billing**
13 **requirement for resale that already has been rejected by the industry.**

14
15 **Update on Electronic Interface Agreements**

16
17 **Q. In your direct testimony, you stated that BellSouth had reached**
18 **agreement with AT&T on electronic operational interfaces for resale. Is**
19 **that still your understanding?**

20
21 **A. Yes, that is still BellSouth's understanding. However, AT&T recently**
22 **has offered conflicting testimony on that point in other states.**
23 **Therefore, BellSouth is attempting to clarify what we believe may be a**
24 **definitional issue regarding the technical design.**

25

1 Industry Standards

2

3 Q. While Mr. Key cites the FCC's requirement for providing access to
4 operations support systems by January 1, 1997, Mr. Key then asserts,
5 on page 60 of his direct testimony, that "Sprint should not be charged
6 for any development work that is not specifically performed at Sprint's
7 request and in accordance with Industry Standard specifications. Any
8 interim solution required to meet the 1/1/97 FCC order that is not
9 industry standard and therefore not usable across the industry, should
10 not be charged to the Alternative Local Exchange Companies
11 ("ALECs)." Does BellSouth agree with this assertion?

12

13 A. No. BellSouth also supports industry solutions. However, given that
14 there are no industry standards for some of the required interfaces,
15 Sprint cannot have it both ways. Either interfaces can be made
16 available as close to January 1, 1997 as possible, or the development
17 must wait until standards are available. Mr. Scheye will address the
18 question of how the costs of the interfaces should be recovered.

19

20 Q. Does the FCC require standardized interfaces?

21

22 A. No, industry standard interfaces are not required by the FCC. This no
23 doubt reflects the FCC's recognition that there are no standards for
24 some of the functions they require. The FCC does indicate, at
25 paragraph 527 of the FCC Order, that nationally standardized

1 gateways represent the ideal, but also, at paragraph 514, recognizes
2 that industry consensus on standards may take twelve months to
3 achieve. The FCC nonetheless ordered a January 1, 1997
4 implementation date, which further indicates that the industry standard
5 is the ideal, but not, as Sprint suggests, a requirement.

6
7 Q. Is there an industry standard for a pre-ordering interface?

8
9 A. No. There is no such standard, and in fact, Ordering and Billing Forum
10 ("OBF") just began discussion of this topic on October 21, 1996.
11 Therefore, BellSouth has had to begin developing its pre-ordering
12 interface without the benefit of such a standard.

13
14 Q. Is there an industry standard for an ordering and provisioning
15 interface?

16
17 A. Yes. There are two industry standards, depending on the type of
18 service, and BellSouth is complying with both. The first is the Access
19 Service Request (ASR) process, which supports the exchange of
20 ordering and provisioning information for interconnection trunking and
21 many unbundled elements. BellSouth currently is processing local
22 interconnection orders with this interface. The second is the Electronic
23 Data Interchange (EDI) interface, which OBF recommends for resale
24 orders and some unbundled elements. Immediately upon OBF's
25 recommendation of this standard in April, 1996, BellSouth began full-

1 time development of this ordering interface, which will be available in
2 advance of the FCC's January 1, 1997 date. Page 74 of Mr. Key's
3 testimony states that Sprint supports BellSouth's development of the
4 EDI interface.

5

6 Q. Is there an industry standard for electronic trouble reporting?

7

8 A. Yes, for some aspects. There is a standard for the trouble reporting
9 function itself, and BellSouth's existing trouble reporting interface
10 complies with that standard. However, there is no standard for the
11 interactive testing functionality that BellSouth is developing in response
12 to the Georgia Public Service Commission's July 11, 1996 order in
13 Docket No. 6352-U, and that will be provided by April 1, 1997.

14

15 Q. Is there an industry standard for the daily transfer of billable usage
16 detail?

17

18 A. Yes. BellSouth has had this arrangement available since March, 1996.
19 This interface utilizes the existing industry standard, known as
20 Exchange Message Record (EMR) format, which is consistent with
21 Sprint's requests.

22

23 Q. Does BellSouth support interfaces based on industry standards?

24

25

1 A. Yes. That has been BellSouth's position all along. For example, in
2 connection with similar issues in the Georgia Public Service
3 Commission Docket No. 6352-U earlier this year, BellSouth's Mr.
4 Scheye filed direct testimony indicating BellSouth's belief that interface
5 solutions "are best managed through existing industry channels such
6 as the national Ordering and Billing Forum (OBF) . . .", and further, that
7 it "would be imprudent for BST to work autonomously toward the
8 development of a highly complex and potentially very expensive . . .
9 interface. . ." (at pp. 17-18). Nonetheless, the FCC order requires
10 BellSouth to develop interfaces even for those functions for which there
11 are no industry standards, and BellSouth is working aggressively to
12 comply with those orders. Therefore, for some functions, it is
13 impossible for BellSouth to accommodate Sprint's insistence on
14 industry standard interfaces while still complying with the timeline
15 established by the FCC, and requested by Sprint.

16
17 Customer Service Records

18
19 Q. Sprint's Mr. Key indicates that Sprint is seeking on-line access to the
20 customer service records in BellSouth's database. What is BellSouth's
21 position?

22
23 A. BellSouth is attempting to balance the customer's need for privacy with
24 the customer's need for convenience. Therefore, BellSouth is not
25 opposed to providing the customer service record to Sprint; BellSouth's

1 only objection is to providing direct, on-line access to those records.
2 This is because all of BellSouth's customer records, as well as
3 resellers' records, are contained in the same database. Therefore,
4 without knowing in advance which customer's record Sprint would want
5 to view -- and more importantly, which customer had given his or her
6 consent -- there would be no way to restrict Sprint to viewing just that
7 customer's account. If on-line access were given to *any* customer's
8 record, then Sprint would be free to look at *all* customers' records,
9 which would jeopardize the privacy of customers' data.

10

11 Q. What are BellSouth's reasons for not providing this information to an
12 ALEC prior to their issuing an order to switch the customer?

13

14 A. First, the current customer service record contains proprietary
15 information on BellSouth's or other ALECs' relationships with end user
16 customers. Sprint is free to initiate its marketing effort by simply asking
17 those customers which services they wish to receive, or which services
18 they already purchase. However, just as BellSouth has taken steps to
19 restrict the ALECs' records from BellSouth's end user marketing
20 centers, it is appropriate to protect the customer records of one
21 company from other companies. Providing Sprint or any other ALEC
22 with direct access to the current service records of any customer the
23 ALEC chooses to target would not be appropriate.

24

25

1 It would not be reasonable to require BellSouth to provide such
2 information on a pre-sale basis for either its customers or any other
3 ALEC's customers. Providing electronic access to this information
4 would allow Sprint or any ALEC to browse BellSouth's databases for
5 marketing purposes.

6

7 Moreover, Florida Statute 364.24 (2) specifically states that:

8

9 Any officer or person in the employ of any
10 telecommunications company shall not intentionally
11 disclose customer account records except as
12 authorized by the customer or as necessary for billing
13 purposes, or required by subpoena, court order, other
14 process of court, or as otherwise allowed by law. Any
15 person who violates any provision of this section
16 commits a misdemeanor of the second degree,
17 punishable as provided in s. 775.082 or s. 775.083.

18 Nothing herein precludes disclosure of customers'
19 names, addresses, or telephone numbers to the extent
20 they are otherwise publicly available.

21 It appears to me that if BellSouth does what Sprint has requested, we
22 would be in violation of this statute and subject to criminal penalties.
23 Nonetheless, as I described earlier, Sprint does have other avenues
24 available for obtaining this information.

25

1 Q. Does the FCC order support BellSouth's position?

2

3 A. Yes. The FCC order, at paragraph 284, concluded that "to the extent
4 new entrants do not need access to all the proprietary information
5 contained within an element in order to provide a telecommunications
6 service, the [FCC] and the states may take action to protect the
7 proprietary information. For example, to provide a telecommunications
8 service, a new entrant might need access to information about a
9 particular customer that is in an incumbent LEC database. The
10 databases to which the new entrant requires access, however, may
11 contain proprietary information about all of the incumbent LECs'
12 customers. In this circumstance, the new entrant should not have
13 access to proprietary information about the incumbent LEC's other
14 customers where it is not necessary to provide service to the new
15 entrant's particular customer. Accordingly, we believe the [FCC] and
16 the states have the authority to protect the confidentiality of proprietary
17 information . . ." BellSouth, therefore, is simply asking this Commission
18 to support BellSouth's efforts to protect customers' proprietary
19 information, and accordingly, has actively pursued other means of
20 ensuring that Sprint and other Alternative Local Exchange Companies
21 ("ALEC"s) can obtain customer service records.

22

23 Q. Has BellSouth, at Sprint's request, agreed to protect Sprint CPNI and
24 the CPNI of Sprint customers?

25

1 A. Yes. BellSouth and Sprint have agreed, as stated on page 2 of Sprint's
2 Term Sheet Matrix ("Exhibit 3"), "to protect one another's CPNI and
3 customer's CPNI. Nor shall this information be used for its own or
4 other marketing purposes. Neither party shall seek release of Sprint or
5 BST CPNI from the customers of the other, as compared to customer
6 CPNI which is subject to customer authorized release."
7

8 Q. What other means are available for an ALEC to obtain customer
9 service information?
10

11 A. First, each customer's monthly bill provides a detailed listing of all the
12 services and features to which each customer subscribes. Therefore,
13 the information Sprint is seeking is available directly from each
14 customer. Second, BellSouth has made arrangements to
15 accommodate customers who are unable to locate their bill. For
16 example, BellSouth will accept three-way calls from the ALEC with the
17 customer, and, with the customer's permission, will read the list of
18 services from its records to the ALEC on the same call, so that the
19 ALEC can conclude its transaction during a single contact with the
20 customer. BellSouth also will fax a printed copy of the customer
21 service record with the customer's permission. In addition, BellSouth
22 has implemented a convenient "switch as is" process, so that the
23 customer can switch without being required to remember each and
24 every service. Meanwhile, BellSouth continues to search for an
25 electronic means of securing the data, but has been unable to find a

1 reliable method as yet. Therefore, BellSouth is asking this Commission
2 to protect customers' privacy by denying Sprint's request for on-line
3 access to existing customer service records.

4
5 **Carrier Billing - Daily Usage File**

6
7 Q. In its petition, Sprint requests that BellSouth provide an electronic
8 interface available for daily customer usage data transfer. Will
9 BellSouth provide this interface?

10
11 A. Yes. As discussed in my direct testimony, this interface has been
12 available since March, 1996. This option provides detail for billable
13 usage such as directory assistance or toll calls associated with a resold
14 line or a ported telephone number. BellSouth is providing the daily
15 usage file at the call level in the industry-standard Exchange Message
16 Record (EMR) format requested by Sprint.

17
18 Q. On page 18 of Mr. Key's testimony, he states that BellSouth will not
19 provide call attempts for resale and unbundled calls in addition to
20 billable calls on the daily usage file. What is BellSouth's position?

21
22 A. BellSouth does not normally record call attempts since call attempts are
23 not billable in the local exchange and resale environments. For
24 example, BellSouth does not bill for an *attempt* to connect a local
25 measured service call, and thus would not routinely provide such

1 information for an ALEC, nor routinely collect such information for its
2 own use.

3
4 Q. Sprint requests that BellSouth provide the daily usage file via an
5 agreed upon media at no additional charge. Does BellSouth agree to
6 provide this data free of charge?

7
8 A. No. As addressed by Mr. Scheye, BellSouth expects to recover the
9 costs of providing electronic interfaces for ALECs.

10
11 Carrier Billing - Monthly Invoice

12
13 Q. On page 29 of the document entitled Sprint Terms For LEC/ALEC
14 Interconnection and Other Agreements dated September 16, Sprint
15 states that it prefers Carrier Access Billing ("CABS") format for monthly
16 invoices in order to facilitate standard industry auditing practices. Has
17 the industry adopted CABS formatted billing for resold services?

18
19 A. No, not at all. While OBF did address resale billing, the purpose of the
20 OBF resolution was to agree on the minimum set of data elements and
21 bill sections that should appear on a resale bill. The resolution did not
22 specify a billing system, nor a format. Page one of the OBF Billing
23 Committee resolution issue #1215, *Resale Billing*, as brought to closure
24 at OBF #55, is provided as Exhibit GC-5. That exhibit contains the
25 resolution statement, the relevant portion of which reads as follows:

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Attachment 1 provides a minimum set of data elements and bill sections required for resale service and associated features. It should be noted that:

- **The bill should be clearly identified as pertaining to Local Resale Service**
- **Usage should be summarized at the TN level**
- **Jurisdiction should be provided for all chargeable elements**

An example bill display containing these minimum data elements is included as Attachment 2.

The "Attachment 2" described in the resolution statement is clearly annotated as follows:

Note: This exhibit is for illustrative purposes only. Its sole purpose is to emphasize the minimum requirements discussed on attachment 1.

The meaning of this is clear: OBF did not adopt CABS format for resale bills.

Q. Did OBF discuss CABS billing for resale bills?

1 A. Yes, but OBF specifically *rejected* adopting a CABS preference for
2 resale bills, despite the attempts of some companies, including Sprint,
3 to have a preference statement added. This issue was discussed at
4 length at OBF #54 in May, 1996. One of the reasons that OBF decided
5 not to adopt CABS mechanized format for resale bills was that there
6 were many other resellers who were not part of the OBF, and those
7 companies cannot handle receiving any type of mechanized format.
8 Another reason was that most of the large local exchange carriers
9 participating, including BellSouth, must bill local exchange services
10 from their Customer Record Information System (CRIS) billing systems,
11 which cannot produce CABS formatted bills. In the absence of a
12 consensus for CABS mechanized format, therefore, the OBF minutes
13 indicate that a CABS preference statement was not added. This is
14 documented on page 27 of the minutes from OBF #54, which is
15 included with this testimony as Exhibit GC-6.

16
17 Q. Which other incumbent local exchange companies will render CRIS
18 bills for resold services?

19
20 A. A poll taken at OBF #54 indicates that Bell Atlantic, GTE, Southwestern
21 Bell, SNET, Sprint Local, and U S West all will produce CRIS bills for
22 resold services. The results of the OBF poll are summarized on the
23 last page of the minutes from OBF #54; a copy of that poll is included
24 with this testimony as Exhibit GC-7.

25

1 Q. What has BellSouth done to ensure that the CRIS system meets the
2 needs of resellers of BellSouth services?

3

4 A. My direct testimony described how CRIS bills can accommodate
5 resellers. BellSouth is able to offer resellers a CRIS bill which
6 incorporates many of the features that the ALECs receive with a CABS
7 bill for access services. For example, BellSouth offers Customized
8 Large User Bills (CLUB) designed for those customers who have
9 multiple service locations, and a variety of differing services. The
10 CLUB billing arrangement provides ALECs with a single bill from each
11 BellSouth Revenue Accounting Office each month, and that bill
12 includes all charges for each of the ALECs' individual end user
13 accounts. In addition, the CLUB bill provides a sufficient level of detail
14 for ALECs to uniquely identify all charges generated by each of their
15 end users.

16

17 Further, the ALECs can choose from a variety of offerings for the actual
18 media through which the billing data is delivered to them. Enhanced
19 Billing Service options include magnetic tape, Diskette Analyzer Bills,
20 CD ROM, Electronic Data Interchange, as well as the paper bills. The
21 CLUB arrangement allows ALECs to choose among numerous sorting
22 options to customize the presentation of billed data to meet their needs.

23

24 BellSouth also has implemented several changes to the CLUB billing
25 procedures to meet specific needs of ALECs. The single bill from each

1 Revenue Accounting Office offers a single balance due for all the
2 aggregated charges associated with the ALEC end user accounts. The
3 billing is performed on a calendar month basis, and the ALEC can
4 choose the billing period when the bill is rendered.

5

6 Q. What is BellSouth asking this Commission to decide concerning carrier
7 billing?

8

9 A. BellSouth requests that the Commission support CRIS billing and CRIS
10 format for resold local exchange services. The Commission should not
11 impose a CABS billing requirement for resale that already has been
12 rejected by the industry.

13

14 Misdirected Calls

15

16 Q. How should misdirected service calls be handled by BellSouth?

17

18 A. If a service call is incorrectly routed to BellSouth, BellSouth's service
19 and repair representatives have been trained to advise the customer
20 that his or her service is provided by the ALEC, and that the customer
21 should contact his or her service provider with questions or problems.
22 If the customer indicates that he or she does not know how to reach the
23 correct service provider, the BellSouth representative will provide a
24 contact number for the service provider, if a contact number has been
25 provided to BellSouth. The BellSouth representative have been

1 specifically trained to make no attempt to "win" the customer during the
2 handling of a misdirected call. Additionally, BellSouth has available for
3 ALECs' use a single toll free number, to which the ALEC can direct
4 misdirected calls placed by BellSouth's end users.

5

6 Switch Features and Services

7

8 Q. Will BellSouth provide access to switch features?

9

10 A. Yes. The source of the switch services and features data provided to
11 ALECs is the same database source which provides the information to
12 BellSouth service representatives. As described in my direct testimony,
13 the currently available pre-ordering arrangements include the
14 capability for ALECs to obtain switch service and feature information
15 and to advise the customer accordingly -- with the customer on the line
16 -- without consulting BellSouth. This arrangement includes the
17 following:

18

- 19 • Real time access via an electronic interface to information that
20 identifies the serving central office for a particular street address,
21 and that validates the address for service order purposes. This,
22 together with the feature information described in the next bullet,
23 allows a ALEC -- with the customer on the line -- to advise the
24 customer of feature and service availability without consulting
25 BellSouth.

- 1 • **Access through a data transmission line to a data file containing**
2 **service and feature availability for each serving central office.**
3 **Using the data line, the ALEC can access this information at will,**
4 **or can download this information to its own computer system**
5 **and access it interactively. Together with the information**
6 **described in the previous bullet, the ALEC can use this**
7 **information to advise its customer of feature and service**
8 **availability -- with its customer on the line -- without consulting**
9 **BellSouth.**

10

11 **Phase two of the pre-ordering interface, which will be available by April**
12 **1, 1997, includes the following capabilities relevant to switch feature**
13 **information:**

14

- 15 • **Real-time access to the information that identifies the serving**
16 **central office for a particular street address, and that validates**
17 **the address for service order purposes, will continue to be**
18 **provided. In addition, BellSouth will enhance this interface to**
19 **provide additional information of interest to the ALEC, such as**
20 **the availability of facilities at a particular location.**
21 • **Real-time access will replace the data transmission line access**
22 **to information on service and feature availability.**

23

24 **Mechanized Testing**

25

1 Q. Sprint has requested read and write access to BellSouth's maintenance
2 and trouble reporting systems including the following functionality:

- 3 • Trouble reporting/dispatch capability - access must be real time;
- 4 • Repair status/confirmations; maintenance/trouble report systems;
- 5 • Planned/unplanned outage reports; and,
- 6 • Mechanized line testing.

7 Please describe the capabilities of the currently available BellSouth
8 interface.

9
10 A. This interface allows the ALEC to enter a trouble report, obtain the
11 same appointment interval that would be given to a BellSouth end user
12 customer, subsequently add information to the report itself, check for
13 trouble completion, cancel the trouble report if necessary and perform
14 other trouble administration functions. In response to troubles reported
15 via this interface, BellSouth will perform mechanized line testing, if
16 necessary, initiate repair to the service and dispatch a technician if that
17 is the appropriate action to be taken based on trouble type and test
18 results. This electronic interface can be used for monitoring troubles
19 with unbundled loops and trunking as well as unbundled ports. This
20 interface was implemented in 1995 for access services, at the request
21 of interexchange carriers, and is based on national standards
22 developed by the American National Standards Institute (ANSI) T1M1.5
23 Committee. The ANSI standard defines the transfer of maintenance
24 requests, status and close-out information between two
25 telecommunications providers. The similarities between this

1 arrangement and the electronic trouble reporting available for access
2 customers are shown in the figure filed with my direct testimony as
3 Exhibit GC-4.

4
5 Q. Is BellSouth's existing trouble reporting gateway consistent with
6 Sprint's definition of an electronic interface to maintenance and trouble
7 reporting systems?

8
9 A. Yes, with two exceptions. Sprint requests electronic notification of
10 planned or unplanned network outages and the ability to monitor
11 BellSouth's network. These capabilities currently are not provided by
12 the electronic trouble reporting gateway. However, BellSouth has
13 agreed to work with Sprint through the appropriate standards bodies
14 and implementation forums, such as the Electronic Communications
15 Implementation Committee (ECIC), to address additional functionality.

16
17 Q. Please describe the additional capabilities being added to the existing
18 electronic trouble reporting interface.

19
20 A. BellSouth is adding the capability for the ALEC to access the same
21 interactive testing sequence that BellSouth follows to screen trouble
22 reports.

23
24 Fully Automated Ordering

25

1 Q. Mr. Key claims, on page 11 of his direct testimony, that "To the extent
2 that any or all of these functions are manual, the process is inefficient,
3 fraught with human error and in no way enables Sprint to provide
4 quality or timely service to its end users." Does this description apply to
5 BellSouth's interfaces?

6
7 A. No, it does not. As described in my direct testimony, BellSouth has
8 provided or is developing mechanized interfaces for each of the areas
9 required by the FCC: pre-ordering, ordering and provisioning, trouble
10 reporting, and billing. As further described in that testimony, by
11 December 31, 1996, BellSouth will have mechanized the order
12 generation process on BellSouth's side of the EDI interface for several
13 types of orders, including "switch as is", new connects for residence
14 and single line business, and disconnects. In addition, BellSouth is
15 continuing to identify additional order types that will be mechanized.
16 Therefore, BellSouth's interfaces, including the EDI ordering interface,
17 eliminate much of the need for the manual handling described by Mr.
18 Key. Furthermore, even for those orders that do require manual entry,
19 such as orders for complex services, this is no different than the
20 process by which BellSouth's service representatives manually input
21 service orders for BellSouth's customers. For example, orders for
22 complex services typically are negotiated with the customer by a
23 salesperson and entered into the systems at a later time by a service
24 representative, rather than being entered with a customer "on the line."
25 While Exhibit GC-2 from my direct testimony included the mechanized

1 order generation process, that exhibit has been updated to more clearly
2 depict the automated order entry BellSouth is providing. The updated
3 exhibit is filed with this testimony as Exhibit GC-8.

4
5 **Q. Please summarize your testimony.**

6
7 **A. There are no industry standards available for some of the functions for**
8 **which BellSouth is providing electronic interfaces, and that are required**
9 **by the FCC. Sprint's simultaneous requests -- for industry standard**
10 **interfaces and for interfaces available by January 1, 1997 -- are**
11 **mutually exclusive for those functions. BellSouth's interfaces are**
12 **consistent with the FCC order, which does not require industry**
13 **standard interfaces.**

14
15 **Florida law, as well as the FCC order, supports BellSouth's position**
16 **that direct, on-line access to customer service records is not**
17 **appropriate. Finally, the Commission should not impose a CABS billing**
18 **requirement for resale that already has been rejected by the industry.**

19
20 **Q. Does this conclude your testimony?**

21
22 **A. Yes.**

23
24
25

Ordering and Billing Forum Issue Identification Form

Issue: Resale Billing

OBF Issue Number 1215
Date Submitted: 1/9/96
Date Accepted: 1/9/96 at OBF #53
Initial Closure: 5/9/96 at OBF #54
Final Closure: 8/29/96 at OBF #55
Issue Category: RESOLVED

Issue Statement:

The billable components of resale billing are not defined or established for paper and mechanized bills.

Impact of Other Issues or Procedures:

Desired Results:

The billable components of resale billing and how they should be billed need to be defined and established for both paper and mechanized bills.

Committee Assignment: Billing
Associated Committee:

Issue Champion: The Billing Committee

Resolution:

The billable components of Resale billing and associated features are defined by each of the governing bodies, including the FCC and the State Public Utilities Commissions.

Attachment 1 provides a minimum set of data elements and bill sections required for resale service and associated features. It should be noted that:

- The bill should be clearly identified as pertaining to Local Resale Service
- Usage should be summarized at the TN level
- Jurisdiction should be provided for all chargeable elements

An example bill display containing these minimum data elements is included as Attachment 2.

In accordance with resolution of OBF Issue 190 this issue is referred to the CABS BOS Technical Review Group. This issue is also referred to the SECAB Review Group.

BILL SECTION: PAGE PAGE

Balance Forward Amounts:

Adjustments Applied (By Jurisdiction), Payments Applied, Total Amount of Last Bill and Total Balance Due

Bill Date

DOCUMENT NUMBER-DATE

11709 NOV-1 88

FPSC-RECORDS/REPORTING

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1215
Date Submitted: 1/9/96	
Date Accepted: 1/9/96	at OBF #53
Initial Closure	at OBF #
Final Closure	at OBF #
Issue Category	

Part B (For Committee Use Only)

Issue: Resale Billing

STATUS HISTORY (PAGE 28)

OBF #54 (Continued)

BILL/MINIMUM REQUIREMENTS REVIEW (Continued)

Based on a customer request for hunt group information, the Committee agreed to add the following the minimum requirements list: Hunt Group Identification (HML), TLJ (Lead Telephone Number), TER (Terminal), and PTN (plant test number) or NHN (Non Hunt Number) (PTN and/or NHN would represent a "discrete" telephone number for the Hunt Group. The discrete TN does not hunt, but is used to test hunting lines).

The Committee also discussed detailed vs. bulk CSR. Mitch Wright questioned which companies would be producing a bulk CSR; he received no response. After further discussion, it was agreed that the detailed CSR would be considered a minimum requirement for resale service.

RESOLUTION STATEMENT DEVELOPED

Having completed its review of the bill display and minimum requirements, the Committee next reviewed a draft resolution prepared by the Co-Leaders. A lengthy discussion ensued concerning the addition of a preference statement for CABS mechanized format. Some customers believed this was necessary and was not inconsistent with what was done in the past. They also expressed concern that there were no mechanized standards in the CRIS world. When EDI was referenced, one customer indicated that EDI was not used for billing; it simply represented electronic transmission of data. Advocates for the addition of this statement pointed out that this would not force companies into providing the information, it merely reflected the customers' preference. Other representatives indicated the statement should not be added. These representatives indicated there were many other resellers who were not part of the OBF. These companies cannot handle the receipt of any type of mechanized format. In addition, as customers, these representatives did not require a mechanized format. Therefore, they objected to a statement that appeared to represent a unified customer preference.

Since consensus could not be reached, a mechanized preference statement was not added. The Committee completed its work on the resolution statement and the issue will be recommended for Initial Closure at the General Session. (Note: Exhibit 1 has been updated to reflect the output vehicle that will be used to bill resale service as of this OBF.)

Attachment 7
 Last Page
 Exhibit 1
 Updated During OBF #54

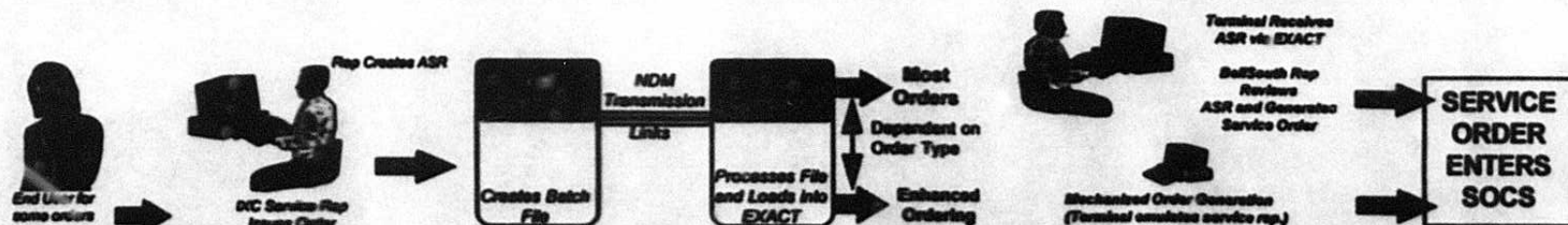
This poll was updated for issue 1215 was updated during OBF #54.

COMPANY	CRIS		SECAB		BOS		OTHER	
	Paper	Mech	Paper	Mech	Paper	Mech	Paper	Mech
ALLTEL	Unknown at this time							
AMERITECH							X	X
AT&T					X	X		
Bell Atlantic	?	F						
BellSouth	X	X						
Bell Sygma	X							
CHA Systems								
Cincinnati Bell	Unknown at this time							
Citizens Telecom	Unknown at this time							
Century	Unknown at this time							
Communications Data Group	X							
ComputoService								
CSC	Not Applicable							
Electric Lightwave			F	F				
EUR Data Center			X	X				
Frontier	-	-	-	-	-	-	-	-
GTE	X	X			F	F		
WORLDCOM	Unknown at this time							
Lincoln Telephone*	Unknown at this time							
Mid America*	Unknown at this time							
MCI								
MCIMetro			F	F			F	
MFS Intelenet	Unknown at this time							
NECA	Not Applicable							
NYNEX						F		
Pacific Bell					X	F		
Pacific Telecom	X	-	-	-	-	-	-	-
PRTC	Unknown at this time							
SWBT	X	X						
S.N.E.T.	X	X						
TDS Telecom	F							
TCG (Teleport)			F	F				
Time Warner			X	X				
Sprint Local	X	X			F	F		
Sprint Long Distance	Unknown at this time - but will be mechanized							
UDP	Unknown at this time							
U.S.WEST	X	X						
Woodbury			F				X	

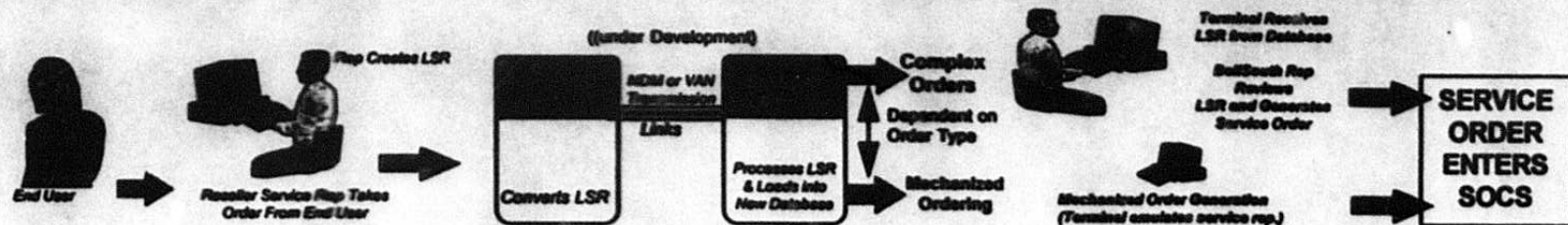
*Note: Companies were not in attendance at this OBF; responses were from the interim meeting.

Comparison of Access and Resale Electronic Order Communications Processes

Access Process



Resale Process



ASR Access Service Request
 EDI Electronic Data Interchange
 EXACT Exchange Access Control and Tracking System
 NDM Network Data Mover

LCSC Local Carrier Service Center
 LSR Local Service Request
 SOCS Service Order Control System
 VAN Value Added Network



Electronic communication for resale is comparable to the electronic process for access ordering. In either case, BellSouth service representatives and systems create appropriate service orders.