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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF GLORIA CALHOUN
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 960846-TP
SEPTEMBER 16, 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 a Manager in the
Strategic Management Unit.

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

A. Yes.

Q. What is the purpose of your testimony?

A. I will address issues in the direct testimony of MCI with respect to
operational interfaces between BellSouth and Alternate Local
Exchange Companies (ALECs) in the following areas:

- Pre-ordering Interfaces

- 1 • Ordering and Provisioning Interfaces
- 2 • Trouble Reporting Interfaces
- 3 • Billing Interfaces
- 4 • Numerous Operational Support System Databases, including
- 5 Directory Assistance, Operator Services and 911/E911

6

7 I will show that BellSouth has been extremely accommodating in

8 providing operational interfaces that are: (1) consistent with the

9 Federal Communications Commission's First Report and Order in CC

10 Docket No. 96-98 ("FCC Order"); (2) appropriate for the market; and,

11 (3) consistent with available industry standards. Many of these

12 interfaces already are available, and, as demonstrated in my direct

13 testimony, BellSouth has implemented a very aggressive schedule to

14 provide additional electronic interfaces. BellSouth will deliver additional

15 interfaces by January 1, 1997, and has scheduled implementation of

16 still additional interfaces or enhancements by April 1, 1997.

17

18 Q. Mr. Martinez and Mr. Price refer to many sections of the FCC Order

19 when discussing the need for electronic operational interfaces. Are

20 BellSouth's plans for the implementation of electronic interfaces for

21 ALEC ordering and provisioning, pre-ordering, trouble reporting, and

22 billing data consistent with the requirements of the FCC Order?

23

24 A. Yes. BellSouth's electronic interfaces are in overall compliance with

25 the precepts described in the FCC Order. However, BellSouth believes

1 the FCC's requirement to provide electronic access to all operational
2 support functionality by January 1, 1997 is an unrealistic date, and will
3 address that matter with the FCC. As noted earlier, on its current
4 schedule, which is already very aggressive, BellSouth will complete its
5 implementation by April 1, 1997. The implementation timeline for each
6 electronic interface is based on the complexity of the requirements
7 associated with that specific functionality. From the analysis and
8 design phase of system development, BellSouth has provided a
9 realistic, firm schedule based on the actual work to be done.

10

11 Q. What guidance did the FCC offer with regard to industry standards?

12

13 A. As cited by Mr. Martinez, the FCC Order, at paragraph 527, states that,
14 "Ideally, each incumbent LEC would provide access to support systems
15 through a nationally standardized gateway. Such national standards
16 would eliminate the need for new entrants to develop multiple interface
17 systems, one for each incumbent."

18

19 Q. Is that consistent with BellSouth's position with regard to national
20 standards?

21

22 A. Yes. BellSouth's emphasis on industry standards is in complete
23 agreement with the FCC's intent. As addressed in my direct testimony,
24 BellSouth's facilities-based ordering arrangements use the industry-
25 standard Access Service Request (ASR) process. BellSouth's

1 Electronic Data Interchange (EDI) resale ordering interface is also
2 consistent with the standard adopted by the industry's Ordering and
3 Billing Forum (OBF) for resale order communications.

4

5 Pre-Ordering Interfaces

6

7 Q. In Mr. Price's testimony and in section II, page 5 of the proposed
8 interconnection agreement attached to MCI's petition, MCI describes
9 pre-ordering as on-line access to all information needed to verify
10 availability of services and features, scheduling of service installation,
11 and number assignment. Does BellSouth agree with this definition?

12

13 A. Yes. As described in my direct testimony, BellSouth's electronic pre-
14 ordering interface will allow a reseller to determine, on a real-time
15 basis, the availability of features and services, assign a telephone
16 number, advise the customer of a due date, and validate a street
17 address for service order purposes.

18

19 Q. Does MCI provide different definitions of pre-ordering elsewhere in its
20 petition and testimony?

21

22 A. Yes. In Mr. Martinez's testimony, pre-ordering and ordering processes
23 involve the exchange of information between LECs about current or
24 proposed customer products and services, or unbundled network
25 elements, or some combination. BellSouth does not agree that pre-

1 ordering information includes the existing customer service record for
2 BellSouth's existing customers prior to the ALEC's ordering service for
3 the customer. This was described in detail in my direct testimony.
4

5 Q. In describing pre-ordering systems on page one of Appendix 1 to the
6 proposed interconnection agreement attached to MCI's petition,
7 "Customer Provisioning, Billing and Servicing Standards Necessary for
8 Local Service Competition" ("Appendix 1"), MCI indicates its desire that
9 pre-ordering information include disclosure of unpaid closed account
10 information (e.g. debtors). Does BellSouth agree that credit history
11 should be included with pre-ordering information?
12

13 A. No. BellSouth does not agree that pre-ordering information includes
14 existing credit history. For pre-ordering, BellSouth will provide
15 information that allows an ALEC to determine the availability of features
16 and services, validate a street address for service order purposes,
17 assign a telephone number when necessary, and advise the customer
18 of a due date. However, BellSouth believes it is not appropriate to
19 provide an ALEC with access to the existing credit history of
20 BellSouth's customers. It also appears to me that Section 364.24 (2),
21 Florida Statutes, as described in my direct testimony, would prevent
22 BellSouth from doing what MCI is requesting.
23

24 Q. In describing pre-ordering systems on page one of Appendix 1 of the
25 proposed interconnection agreement attached to MCI's petition, MCI

1 indicates its desire that pre-ordering information include interfaces to
2 systems created to track and assign unbundled elements to customers.

3 Does BellSouth agree?
4

5 A. No. Again, as BellSouth understands it, this request refers to the
6 customer service record information contained in BellSouth's billing
7 systems. This information should not be disclosed for the reasons
8 discussed previously in this testimony, as well as in my direct
9 testimony.
10

11 Q. In describing pre-ordering systems on page one of Appendix 1 to the
12 proposed interconnection agreement attached to MCI's petition, MCI
13 indicates its desire that pre-ordering information include interfaces to
14 systems that support the interim RCF number portability solution. Does
15 BellSouth agree?
16

17 A. No. There is no such interface, nor is one logical. In the case of
18 interim number portability, there is no need for the ALEC to perform the
19 pre-ordering function of telephone number assignment. The point of
20 interim number portability is to allow a customer to retain a telephone
21 number previously assigned to that customer.
22

23 Q. In describing pre-ordering systems on page one of Appendix 1 to the
24 proposed interconnection agreement attached to MCI's petition, MCI
25 indicates its desire that pre-ordering information include interfaces to

1 systems that provide the list of interexchange carrier (IXC)
2 presubscribed interexchange carrier (PIC) choices. Has BellSouth
3 agreed to provide this information in its pre-ordering interface?
4

5 A. Yes. Access through a data transmission line to a data file containing
6 service and feature availability for each serving central office is
7 currently available to ALECs. This data includes a list of valid IXC PIC
8 choices. In addition, BellSouth is providing on-line, real-time access to
9 information in its products and services database via the pre-ordering
10 interface scheduled for delivery by April 1, 1997. This is equivalent to
11 the information available to BellSouth service representatives.
12

13 Q. Are there any other differences in MCI's and BellSouth's pre-ordering
14 definitions?
15

16 A. Yes. MCI indicates its belief, on page 14 of the proposed
17 interconnection agreement attached to its petition, that information
18 about service and feature availability for each switch should include
19 business and residence line counts and rate centers. While BellSouth
20 is providing most of the information requested by MCI, BellSouth does
21 not agree that business and residence line counts are part of pre-
22 ordering information. This information is not currently captured by
23 BellSouth, and therefore is not used by BellSouth service
24 representatives. Even if it were, however, BellSouth does not believe
25 that this information is consistent with the purpose of pre-ordering

1 information, as it has no bearing on negotiating an order with an end
2 user customer.

3

4 Q. MCI requests that BellSouth provide an initial electronic copy and hard
5 copy of the service address guide (SAG), or its equivalent, on a going
6 forward basis. Does BellSouth's pre-ordering interface provide for this
7 request?

8

9 A. Yes. The capability currently exists for ALECs to access this
10 information electronically, either on a Local Area Network (LAN) to LAN
11 basis, or via a dial-up arrangement. In addition, the street address
12 validation portion of the April 1, 1997 pre-ordering interface will allow
13 on-line, real-time electronic access to this information, which is included
14 in BellSouth's Regional Street Address Guide (RSAG). However,
15 BellSouth has not agreed to provide a hard copy of its RSAG data for
16 the following reasons: (1) there is no programming in place to print a
17 formatted copy; (2) a printed copy, even if one were available, would
18 be incredibly voluminous; (3) electronic access currently is available;
19 and, (4) a hard copy is not currently available to BellSouth service
20 representatives.

21

22 Q. Both in Mr. Martinez's testimony on page 16 and in numerous cites in
23 the proposed interconnection agreement (e.g., page 6, section II)
24 attached to MCI's petition, MCI requests that BellSouth provide the
25 ability to obtain telephone numbers on-line from the ILEC, and to

1 assign these numbers, including vanity numbers, with the customer on-
2 line. Does BellSouth's pre-ordering interface accommodate this
3 request?

4
5 A. Yes. As described in my AT&T direct testimony on page 39, the pre-
6 ordering interface under development and scheduled for delivery on
7 April 1, 1997, will provide on-line, real-time electronic access to the
8 BellSouth number assignment system. This will replace the interim
9 process available now, which provides a computer diskette file
10 containing a pool of telephone numbers reserved for the ALEC in each
11 central office requested by the ALEC. Even the interim process allows
12 an ALEC to assign most telephone numbers with the customer on-line,
13 without consulting BellSouth. The April 1, 1997 enhancement will
14 support the assignment of all numbers, including vanity numbers.

15
16 Q. In Mr. Martinez's testimony on page 15 and in section XIV, page 6 of
17 the proposed interconnection agreement attached to MCI's petition,
18 MCI asserts that the ILEC must identify service, feature and product
19 availability for all products at end office level or at a finer level of
20 granularity if availability varies at such a level. Specific examples
21 include, but are not limited to, Centrex availability. Has BellSouth
22 accommodated this request?

23
24 A. Yes. This information is currently available for each serving central
25 office via electronic file transfer. This information will also be part of the

1 on-line, real-time pre-ordering interface to BellSouth's features and
2 services database scheduled for implementation by April 1, 1997.

3

4 Ordering and Provisioning Interfaces

5

6 Q. In Mr. Martinez's testimony on page 10, as well as throughout MCI's
7 proposed interconnection agreement attached to its petition (e.g.,
8 Section I, page 8, paragraph 6.1.2), MCI cites the need for BellSouth to
9 provide *electronic ordering interfaces*. Please describe BellSouth's
10 ordering interfaces.

11

12 A. As described in my AT&T direct testimony on pages 5-6, BellSouth will
13 use the existing mechanized Access Service Request (ASR) process
14 for ordering interconnection trunking and unbundled elements such as
15 unbundled loops, local transport, collocation, and tandem switching.
16 This system, called EXACT (Exchange Access Control and Tracking),
17 was put into place in 1984 to provide mechanized order
18 communications between BellSouth and IXCs, and operates in
19 accordance with national industry standards. Those standards were
20 developed by the telecommunications industry's standard-setting body,
21 the Ordering and Billing Forum (OBF). The OBF has endorsed the
22 ASR method for processing local interconnection trunking orders.

23

24 BellSouth also is developing an OBF-sanctioned Electronic Data
25 Interchange (EDI) interface that can support ordering of resold

1 services, and certain unbundled elements, such as listings, that are not
2 supported by the ASR process. This interface was fully described in
3 my direct testimony, and is scheduled to be available for the first
4 production site prior to January 1, 1997.

5

6 Q. Will these interfaces meet MCI's ordering needs?

7

8 A. Yes. The ASR process is an industry-standard process, and as such
9 meets MCI's requests for Firm Order Confirmation (FOC), and rejection
10 or error notification. However, other information requested by MCI,
11 such as notification of special construction charges, is not supported by
12 the industry-standard process, and will be handled in the same manner
13 as for access services, i.e., the appropriate BellSouth work center will
14 advise the MCI ordering contact of any pertinent information as it
15 becomes available. This is equivalent to the manner in which
16 BellSouth service representatives would obtain such information.

17

18 EDI also is recognized by the industry as the standard for resale
19 ordering, and MCI is very much in favor of complying with industry
20 standards. In fact, MCI, in supporting its emphasis on standardized
21 interfaces, on page eight of Mr. Martinez's direct testimony states that,
22 "ILECs that provide unique interfaces to their databases and operations
23 support systems do not meet the requirement to provide access of
24 equal quality to operations support systems." Mr. Martinez further cites
25 the FCC Order, at paragraph 527, which states that, "Ideally, each

1 incumbent LEC would provide access to support systems through a
2 nationally standardized gateway." BellSouth's EDI ordering interface is
3 consistent with MCI's request, with emerging industry standards for
4 resale, and with the FCC Order.

5

6 Q. MCI asserts, on page 3 of Appendix 1 to the proposed interconnection
7 agreement attached to MCI's petition, that BellSouth must provide
8 exception reporting which highlights missed service installations. Does
9 BellSouth plan to provide this type of reporting?

10

11 A. No. ALECs will be provided with a Firm Order Confirmation (FOC) ,
12 which includes the due date of the order. ALECs also will receive
13 notification of completions. Therefore, an ALEC can combine these
14 two items of information to create exception reports.

15

16 Q. Both Mr. Martinez's testimony and MCI's petition on pages 8-9, section
17 I of the proposed interconnection agreement, address MCI's request for
18 dedicated BellSouth carrier centers, available 7 days a week, 24 hours
19 a day. What is BellSouth's position?

20

21 A. BellSouth currently has in operation maintenance service centers for
22 interconnection services, business, and residence trouble handling.
23 These centers operate 24 hours a day, 7 days a week. BellSouth
24 disagrees that separate centers should be dedicated to individual

25

1 ALECs. The existing centers will handle repair for ALECs, as well as
2 BellSouth end users, in the same manner and the same timeframes.

3

4 The ordering centers supporting ALECs were described in my direct
5 testimony. Local interconnection and resale orders will be processed in
6 the Interexchange Carrier Service Center (ICSC) and Local Carrier
7 Service Center (LCSC), respectively. Both centers currently operate
8 during standard business hours. However, because both centers will
9 be supported by the electronic order interfaces described in my direct
10 testimony, BellSouth can accept orders 24 hours per day, 7 days per
11 week, but will process those orders during the centers' normal hours of
12 operation. This is consistent with access ordering today. In the
13 absence of reliable forecast information that would indicate otherwise,
14 BellSouth believes this is a reasonable arrangement. However,
15 BellSouth has agreed to re-evaluate the operations of these centers, if
16 warranted by service order volumes.

17

18 Q. On page 4, section IV of the proposed interconnection agreement
19 attached to MCI's petition, MCI requests that automated interfaces be
20 provided by BellSouth into a centralized operations support system
21 database for completion confirmation. Will BellSouth have an interface
22 to provide completion information?

23

24 A. Completion notification will be provided via the EDI ordering interface.

25

1 Q. MCI further asserts that installation intervals must be established to
2 ensure that service can be established via unbundled loops in the
3 same timeframe as BellSouth provides services to its own customers,
4 as measured from the date of customer order to date of customer
5 delivery. Can this be accomplished?

6
7 A. Yes, this can be accomplished as long as both services are alike. This
8 issue was previously addressed before the Florida Public Service
9 Commission ("FPSC" or "Commission") in connection with a similar
10 request from MFS in response to Order No. PSC 96-0444-FOF-TP in
11 Docket No. 950984-TP. In response to that order, BellSouth filed a
12 report on May 28, 1996, a copy of which is attached to this testimony
13 as Exhibit GC-1. That report explained the provisioning process for
14 unbundled loops, and also explained why the provisioning activities for
15 unbundled loops could be very different from the provisioning activities
16 for a bundled exchange service.

17
18 BellSouth has developed procedures to convert existing loops
19 wherever possible to an unbundled loop without complete re-
20 provisioning. For the most part, and whenever possible, existing
21 facilities will be re-used, with the existing loop being redirected to the
22 ALEC facilities. The ALEC will notify BellSouth to issue a disconnect
23 order to free the loop, and a new connect order for the unbundled loop.
24 BellSouth will need to schedule a BellSouth technician to do the
25 physical disconnection and cross connection of the loop to the ALEC's

1 loop transport facilities, in addition to coordinating and scheduling such
2 cross connection with MCI or other respective ALEC.

3

4 The manual coordination involved in this process, the required
5 scheduling of physical work to redirect the loop, the re-provisioning
6 requirements when Subscriber Loop Carrier system facilities are
7 involved, and the coordination with the ALEC are different from the
8 provisioning requirements of a bundled exchange service. *Conversions*
9 of bundled services where facilities are already connected sometimes
10 *can be simply activated through a mechanized process and can be*
11 *done on short notice. On the other hand, orders for bundled service*
12 *where facilities are not available may require more time than a*
13 *coordinated conversion of an unbundled loop. Installation for retail*
14 *bundled services will vary depending upon the unique circumstances of*
15 *the request. The interval for provisioning a bundled single line*
16 *residence or business line will typically vary from one to five days,*
17 *depending upon factors such as the availability of facilities, whether*
18 *those facilities are already connected through to the central office, work*
19 *load, scheduling of forces in particular offices and many other factors.*

20

21 For these reasons, BellSouth cannot guarantee that provisioning for
22 conversions of unbundled loops will occur in precisely the same time
23 interval as provided for a bundled service, because the provisioning of
24 an unbundled loop requires additional procedures, as well as
25 *coordination with the ALEC, that are not applicable to bundled services.*

1 It is, however, BellSouth's intent to establish intervals for unbundled
2 loops on a "Customer Desired Due Date" (CDDD) basis.

3

4 Q. Please describe BellSouth's Customer Desired Due Date process.

5

6 A. Under the CDDD process, BellSouth will provide service on the
7 requested due date or, if the requested date cannot be met, on the
8 earliest available installation date thereafter. Every effort will be made
9 to meet an end user's, or an ALEC's, requested due date if one is
10 provided. The due date is impacted by work load, features and
11 services requested and equipment availability. These items can only
12 be determined when the order is processed. By applying CDDD
13 guidelines to ALECs' requests for unbundled loops, BellSouth is
14 committed to working with ALECs to meet their individual needs. It is
15 BellSouth's intention to give ALECs' orders for unbundled elements
16 when converting existing service or provisioning new loops the same
17 priority it gives its end user orders, and to establish similar intervals for
18 similar services in similar circumstances.

19

20 911 and E911 Interfaces

21 Q. In Mr. Price's additional direct testimony on page 23-24 and on page 1,
22 section VII (911) , paragraph 1.3 of the proposed interconnection
23 agreement attached to MCI's petition, MCI requests an automated
24 interface to the Automatic Location Identification (ALI) database and
25 access to the MSAG (Master Street Address Guide), any mechanized

1 systems used in the editing process, and any other systems and
2 processes used in populating the 911 ALI (Automatic Location
3 Identification) database. Has BellSouth agreed to provide this?
4

5 A. Yes. Three databases are required to provide the E911 data for
6 display at the PSAP.

- 7 ● Master Street Address Guide (MSAG)
- 8 ● Telephone Number (TN) Database
- 9 ● Network Tandem Information (TN/ESN)

10 BellSouth has arranged for access to all three databases. Upon
11 request, the MSAG will be sent quarterly to the ALEC. The network
12 information files in the Interim Regional Emergency Information System
13 (IREIS) database are used to update both the telephone number and
14 tandem databases. ALECs will send daily updates for E911 to the
15 IREIS database via mechanized file transfer. The procedures for doing
16 so are specified in the E911 LOCAL EXCHANGE CARRIER GUIDE
17 FOR FACILITY-BASED PROVIDERS that BellSouth has prepared for
18 use by ALECs. Given the critical nature of E911 services, BellSouth
19 will continue to cooperate to the fullest extent to ensure the continued
20 integrity of this system in a multi-local exchange carrier environment.
21

22 Q. On page 2, section VII, paragraph 1.8 and 1.9 of the "proposed
23 interconnection agreement" attached to MCI's petition, MCI asserts that
24 ILECs must adopt National Emergency Number Association (NENA)
25 standards for ALI records. Does BellSouth agree?

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A. No. This question previously was addressed in BellSouth's response to Order No. PSC-96-0445-FOF-TP in Docket No. 950985-TP. As explained in that report, BellSouth established database and data exchange standards prior to the development of NENA standards. BellSouth standards were established to meet the needs and accommodate the equipment constraints of BellSouth's E911 customers and public safety answering points (PSAPs), and also are used by each of the independent companies that provide data to the BellSouth E911 database. Therefore, adopting a different format would be disruptive to the existing users of the E911 systems. BellSouth's format also exceeds the NENA standard in that BellSouth proactively added the capability to accept and display dual telephone numbers to eliminate any possible confusion in handling E911 calls involving interim number portability. NENA is actively working to include dual numbers in standards, but has not yet issued new standards. Nonetheless, the BellSouth standard data exchange format contains all fields currently available in the ALI data stream and made available to the PSAP for display. BellSouth will continue to participate in NENA standards committees and evaluate future data needs. In fact, BellSouth chairs the NENA Study Group that is developing the first standard ALI data stream. Migration to NENA data exchange standards will be considered as PSAP requirements dictate.

Maintenance and Trouble Reporting Interfaces

1

2 Q. In Mr. Martinez's testimony on page 13, he defines maintenance and
3 repair as the exchange of information between LECs in which one
4 initiates a request for repair of existing products and services or
5 unbundled network elements (or combinations) from the other, with
6 attendant acknowledgments and status reports. Does BellSouth's
7 electronic interface for trouble reporting meet this definition?

8

9 A. Yes. As described in my direct testimony, BellSouth has a fully
10 electronic, real-time, interactive trouble reporting interface currently
11 available for use by ALECs. This interface allows the ALEC to create a
12 trouble ticket, add information to the ticket, status the trouble and
13 cancel the trouble ticket. This electronic interface can be used for
14 monitoring troubles with unbundled loops and interconnection trunking.
15 This interface is based on national standards developed by the
16 American National Standards Institute (ANSI) T1M1.5 Committee.

17

18 In addition, BellSouth has under development an enhancement that will
19 provide ALECs with access to the same interactive testing capabilities
20 BellSouth uses to screen trouble reports. That enhancement also was
21 described in my direct testimony.

22

23 Q. Is BellSouth's existing trouble reporting gateway consistent with MCI's
24 definition of an electronic interface to maintenance and trouble
25 reporting systems?

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A. Yes, with two exceptions. MCI requests electronic notification of planned or unplanned network outages, and also requests the ability to monitor BellSouth's network itself. These capabilities currently are not provided by the electronic trouble reporting gateway described in my direct testimony. However, BellSouth has agreed to work with MCI through the appropriate standards bodies and implementation forums, such as the Electronic Communications Implementation Committee (ECIC), to determine when and how such capabilities should be implemented.

Q. On page 10, section I of the proposed interconnection agreement attached to MCI's petition, MCI maintains that ILECs need to adopt multi-ILEC trouble management procedures developed by the industry's Network Operations Forum (NOF) in its Issue #226 Working Document. Does BellSouth agree?

A. BellSouth agrees in principle, but does not agree for the particular issue number cited by MCI. BellSouth's access methods and procedures are consistent with and support the NOF's Issue #226. That issue, however, is specific to access services. BellSouth will participate in the NOF's current effort related to local interconnection, which is NOF's Issue #229.

1 Q. On page 3, section II of the proposed interconnection agreement
2 attached to MCI's petition, MCI requests real-time control over switch
3 traffic parameters, real-time access to integrated test functionality and
4 real-time access to performance monitoring and alarm data affecting
5 BellSouth's network. What is BellSouth's position?
6

7 A. Network monitoring and repair will remain BellSouth's responsibility as
8 the underlying network provider. However, BellSouth has agreed to
9 work with MCI through the appropriate standards bodies and
10 implementation forums such as the Electronic Communications
11 Implementation Committee (ECIC) to determine when and how such
12 capabilities should be implemented.
13

14 Q. On page 10, section II of the proposed interconnection agreement
15 attached to MCI's petition, MCI requests that the ILEC provide status
16 reports so that MCI will be able to provide end user customers with an
17 estimated time to repair (ETTR). Does BellSouth agree?
18

19 A. No. While BellSouth's existing trouble reporting system does provide
20 individual commitment times for basic exchange trouble reports, that
21 system does not provide electronic interim status reports with individual
22 ETTR information on each trouble ticket. This is equivalent to the
23 information available to BellSouth's repair attendants.
24

25 Billing Interfaces

1

2 Q. MCI asserts that for ILEC/ALEC billing, a Carrier Access Billing System
3 (CABS) or CABS-like billing system should be used for charges related
4 to interconnection, unbundled elements, and resale. Does BellSouth
5 agree?

6

7 A. No. As described on page eight of my direct testimony, BellSouth
8 believes this is completely inappropriate. The CABS billing system is
9 designed to render bills for access services. BellSouth CABS bills do
10 not include the line level detail, such as itemized directory assistance
11 calling, associated with resold exchange lines. The billing system that
12 supports exchange services is the Customer Record Information
13 System (CRIS). BellSouth believes that MCI is expressing a
14 preference for CABS billing based on its familiarity with CABS billing in
15 the interexchange world, as well as its use of quality control processes
16 for CABS billing.

17

18 However, the CRIS billing system already contains the necessary
19 infrastructure to provide the line level detail associated with resold
20 services, and also is subject to BellSouth's internal quality controls.
21 The CABS system is not designed for this task; without extensive and
22 costly modifications, it would not even be capable of accomplishing the
23 desired outcome.

24

25

1 Q. On page 12 of the proposed interconnection agreement attached to
2 MCI's petition, MCI indicates that BellSouth's position is that paper
3 CRIS bills should be provided for non-access-like services. Is this an
4 accurate representation of BellSouth's position?

5

6 A. No. CRIS bills currently are available in the ALEC's choice of several
7 formats:

8

- 9 • Electronic Data Interchange (EDI) Transmission
- 10 • Diskette Analyzer Bill Format
- 11 • Magnetic Tape
- 12 • CD-ROM
- 13 • Paper

14

15 Q. MCI requests that the CRIS daily usage file provide information at the
16 call level in standard Exchange Message Record (EMR)/Exchange
17 Message Interface (EMI) industry format. Are BellSouth's
18 arrangements consistent with that request?

19

20 A. Yes. The CRIS daily usage file provides usage data for each billable
21 call. BellSouth provides this information in the Exchange Message
22 Record (EMR) format.

23

24 Q. In section XIV, page 12 of the "proposed interconnection agreement"
25 attached to MCI's petition, MCI requests the ILEC return EMI Exchange

1 Message Interface (EMI) records to IXCs with an OBF standard
2 message reject code. Has BellSouth agreed to do this?

3

4 A. Yes. BellSouth has enhanced its billing system to recognize IXC
5 messages billable to an ALEC account and has implemented edits to
6 prevent such billing using the appropriate codes.

7

8 Q. In Mr. Martinez's testimony on page 16 and in the proposed
9 interconnection agreement (Section XIV, page 11, paragraphs 5.4.2.2
10 and 5.4.2.3), MCI has asked for non-discriminatory access to the
11 Centralized Message Distribution System (CMDS) database for inter-
12 region and intra-region alternately billed messages. Has BellSouth
13 agreed to provide this?

14

15 A. No, but only because it is BellSouth's understanding that MCI metro
16 currently obtains CMDS hosting from another Regional Bell Operating
17 Company (RBOC), and the current industry practice is to have one host
18 per hosted entity. This industry-wide restriction is a result of a shortage
19 of assignable codes necessary to facilitate the hosting arrangements.
20 Should MCI decide at any point in the future that it prefers to obtain
21 CMDS hosting from BellSouth, BellSouth will work jointly and
22 cooperatively with MCI to provide this service. CMDS hosting is a
23 contractual arrangement between BellSouth and the hosted company,
24 and BellSouth will offer the same arrangements, terms and conditions
25 to MCI that have been offered to other hosted companies.

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Q. On page 3 of Appendix 1 attached to MCI's petition, MCI asserts that a new long term solution should be implemented for processing alternate billed calls. Does BellSouth agree?

A. No. BellSouth is a participant in Bellcore's CMDS and Credit Card and Third Number Settlement (CATS) systems. These are systems that handle the exchange and settlement of alternately billed messages, such as collect calls, between RBOCs and those companies they host. The current arrangement has been in place for at least 12 years, and continues to handle millions of messages daily with very few problems. BellSouth also has an internal message distribution process for handling alternately billed messages that originate and bill within the BellSouth region. This process has been in place for a number of years as well. BellSouth is the CMDS host for a number of ALECs and continues to offer this service to any ALEC that competes within the BellSouth region.

To abandon the established processes would require extensive changes to BellSouth's mechanized systems and could be quite expensive. It also does not necessarily guarantee a more accurate or efficient process. A replacement of Bellcore's national system would require an industry-wide agreement and participation from all current direct and indirect participants and would necessitate changes in all companies' message exchange systems. For these reasons, BellSouth prefers to continue utilizing existing processes for the handling of alternately billed messages.

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2 Database Access

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4 Q. In addition to the interfaces already described, MCI lists a number of
5 databases in Mr. Martinez's testimony and in the proposed
6 interconnection agreement attached to its petition for which it believes it
7 needs electronic access. What is BellSouth's position on providing
8 such access?

9

10 A. The additional interfaces requested, and BellSouth's position on each,
11 are as follows:

12

- 13 • Long Term Local Number Portability

14

15 The long term local number portability database does not exist at the
16 present time. While this database has not yet been developed by the
17 industry, it is BellSouth's understanding that this database will be
18 administered by a neutral third party; therefore MCI's request for such
19 access is not appropriately addressed to BellSouth.

20

- 21 • Intercept Information, Line Information Database (LIDB), Listing
22 Services Database, and Directory Assistance Databases

23

24 Direct access to these databases would not be equivalent to
25 BellSouth's internal access to these databases. Updates to these

1 databases for BellSouth's users are driven by the service order
2 process. This is the same service order process that will be used for
3 MCI's and other ALECs' service orders. Thus, MCI's and BellSouth's
4 access to those systems will be comparable, and no additional
5 interfaces are required.

6

7 • Billing Name and Address Database

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9 Today, access to billing name and address via the CARE system is
10 restricted to interexchange carriers. However, BellSouth is willing to
11 work cooperatively with MCI through OBF to evaluate whether the
12 existing CARE process should be modified for ALECs.

13

14 • Operator Reference Information/Operator Reference Database

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16 This request refers to a database maintained by some companies that
17 operators can access to retrieve telephone numbers for emergency
18 agencies, such as fire departments or law enforcement. However,
19 BellSouth does not have this database. BellSouth's operators use a
20 paper document that contains this information. While BellSouth
21 believes that providing or maintaining such information is the
22 responsibility of an ALEC's operator services provider, BellSouth has
23 agreed to provide a copy of its document on a one time basis to the
24 ALEC, upon request, in order to facilitate the ALECs' local market
25 entry.

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- Local Calling Area

BellSouth will work cooperatively with MCI and other ALECs to assist them in obtaining such information in a suitable format.

- Plant Inventory Data

Based on BellSouth's understanding of this request, BellSouth believes such access is not required by the FCC Order. As described by MCI on page 16 of Mr. Martinez's testimony, such access is not required to support MCI's pre-ordering, ordering and provisioning, maintenance and repair, or billing activities. Rather, Mr. Martinez suggests that such access is necessary to "reduce the likelihood that MCI will request infeasible points of interconnection or unbundled network functions." Even if such access were required, however, such access would not support MCI's stated purpose. It does not follow that knowing the specific details regarding quantities and locations of BellSouth's equipment would assist in any way in determining the technically feasible methods by which that equipment might be interconnected.

Finally, MCI requests access to databases, e.g., Centrex Business Group Information, Universe List, and TMN type database, which are unfamiliar to BellSouth, and for which BellSouth believes it has no such database.

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2 Q. Please summarize your testimony.

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4 A. BellSouth has provided extensive access to the systems and
5 databases required by the FCC Order in the areas of pre-ordering,
6 ordering and provisioning, maintenance, trouble reporting and billing.
7 Additionally, BellSouth has been extremely accommodating in providing
8 access to databases and data from numerous systems for use by
9 ALECs. Many enhancements have been made to these systems
10 specifically to facilitate use by ALECs, and many changes continue to
11 be made to fine tune the processes already in place. BellSouth
12 continues to cooperate with ALECs and the telecommunications
13 industry to facilitate the introduction of local exchange competition.

14

15 Q. Does this conclude your testimony?

16

17 A. Yes.

18

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