

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

REBUTTAL TESTIMONY OF TIMOTHY L. DECAMP

ON BEHALF OF MCI

DOCKET NO. 960980-TP **960847**

September 30, 1996

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Timothy L. deCamp and my business address is 8521 Leesburg Pike, Vienna Virginia.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes, I filed direct testimony in this docket on August 26, 1996.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to the testimony of Mr. Langley. In particular, I will show that the type of access to operations support systems proposed by GTE will prevent MCI from achieving parity with GTE in service to its customers.

Q. AT PAGES 6-7 OF HIS TESTIMONY, MR. LANGLEY SEEMS TO STATE THAT ALECs WILL HAVE PARITY WITH GTE BECAUSE GTE'S OPERATIONS SUPPORT SYSTEM FUNCTIONS WILL BE USED IN THE SAME WAY FOR ALECs AS FOR GTE. IS THIS PARITY?

A. No. Throughout his testimony, Mr. Langley refers to operations support system FUNCTIONS and appears to argue that parity is achieved so long as the same systems are used to process orders, repair requests, etc., for the ALECs as GTE

1 uses itself. This is a truly remarkable statement. A GTE service representative
2 sits at his or her workstation and places an order which flows through
3 automatically to install service for a residential customer. If the service
4 representative needs to verify address, or service feature and function
5 availability, that information is at their fingertips on-line. Now consider what
6 happens when MCI wants to place an order. MCI must call GTE to reserve a
7 number and get a due date which creates a place holder for service. MCI must
8 then transmit to GTE a Local Service Request (LSR), which, if not received by
9 noon on the date the order is made (no explanation as to what is to occur with
10 orders placed after noon) the place holder will be lost and a new due date
11 assigned. For some undetermined period of time, MCI will be required to
12 submit these LSRs through E-mail, fax or internet. No date for electronic
13 interfaces, let alone real-time interactive interfaces, is provided. MCI may be
14 lucky enough to get certain data base information provided on paper or on tape,
15 but will have no electronic or real-time access as the MCI customer service
16 representative talks with its customer. But, says GTE, there is parity because
17 once the MCI order is received at GTE it will be processed by the same systems
18 as GTE uses itself. In fact Mr. Langley goes on at great length describing these
19 systems. This obfuscates the real issue -- there will not be parity until MCI has
20 real-time interactive interfaces.

21

22 Q. AT PAGE 7 OF HIS TESTIMONY, MR. LANGLEY STATES THAT GTE
23 WILL MAKE AVAILABLE TO MCI THE ABILITY TO ORDER TRUNK-
24 SIDE INTERCONNECTION SERVICES FROM GTE THROUGH DIRECT
25 ELECTRONIC INTERFACES TO THE SAME SYSTEMS THAT GTE USES

1 TODAY TO PROCESS IXC ORDERS FOR ACCESS PURCHASES. AT
2 PAGE 10, MR. LANGLEY STATES THAT LINE SIDE SERVICE WILL
3 ALSO BE AVAILABLE FOR ORDERING AT SOME POINT THROUGH
4 ELECTRONIC INTERFACES. ARE ELECTRONIC INTERFACES
5 ADEQUATE FOR EFFECTIVE COMPETITION TO DEVELOP?

6 A. No they are not. Until such time as ALECs have real-time interactive interfaces
7 to the GTE operations support systems there will be no parity of service to end
8 users between GTE and the ALECs. GTE suggests that what MCI is seeking is
9 more than parity. To GTE parity means only that MCI gets the same system
10 functionality as GTE. As I attempted to show with the previous example, this
11 contention is absurd. There is no way that MCI will be able to serve customers
12 as efficiently or effectively as GTE, let alone have an opportunity to become a
13 provider of better quality service, if it is discriminated against in terms of how
14 it obtains access to these system functions.

15

16 Q. AT PAGE 29 OF HIS TESTIMONY, MR. LANGLEY CONTENDS THAT
17 DIRECT ACCESS TO GTE'S OPERATIONS SUPPORT SYSTEMS HAS
18 DRAWBACKS, ONE OF THE MOST CRITICAL BEING THE INABILITY
19 TO PROTECT CUSTOMER PROPRIETARY NETWORK INFORMATION
20 (CPNI). WHAT IS MCI'S POSITION ON ACCESS TO CPNI?

21 A. MCI is not seeking blanket access to CPNI. MCI seeks access to CPNI only
22 when it has customer permission. MCI has offered to provide to GTE a blanket
23 letter of authorization ("LOA") which will represent that MCI has customer's
24 authorization whenever its accesses information or takes action on behalf of a
25 customer.

1 Q. WHY IS ACCESS TO CPNI, WITH THE CUSTOMER'S PERMISSION,
2 IMPORTANT TO MCI?

3 A. It is important for several reasons. First, residential and small business
4 customers are often not aware of all the services to which they subscribe. It
5 will thus be virtually impossible for MCI to establish a complete and correct
6 customer record for purposes of ordering service without access to CPNI. In
7 addition, unless MCI fully understands a customer's service information during
8 sales calls, it cannot make apples-to-apples price quotations to prospective
9 customers. If MCI quotes a price based on the recollection of the customer as
10 to its existing services, and after the sale MCI discovers the customer has
11 different services than discussed, MCI will be in the very awkward position of
12 having to go back to the customer with new pricing or absorbing any pricing
13 differences. For the small business customer, an error in establishing service
14 could cost the business its livelihood.

15
16 For medium and large business customers there are even more issues. With
17 more services and locations, combined with changing personnel, business
18 customers are not going to want to spend time providing new entrants details
19 about their services for new entrants to make price quotes. Time is money to
20 these business customers. Unless new entrants can offer proposals without
21 requiring work effort on the part of the business customers, competition will be
22 stifled.

23
24 Additionally, in the case of business customers with complex services, the
25 likelihood of orders being rejected will be substantially increased if MCI does

1 not have complete and fully updated customer information at the time of
2 ordering. With more services it is likely that the customer will not get it right
3 from his or her recollection. Not having it right means a rejected order,
4 delayed service installation, and customer dissatisfaction for a new MCI
5 customer.

6
7 And I am not speculating here about problems. Southern New England
8 Telephone (SNET) recently rejected an MCI order to convert service of a
9 business customer. The customer advised MCI that six lines were to be
10 converted so this is what MCI requested on the order. SNET records reflected
11 that the customer had 7 lines and the order was rejected for this reason, as well
12 as for the additional reason that SNET questioned the hunting sequence.

13
14 Q. AT PAGES 34-35 OF HIS TESTIMONY, MR. LANGLEY ARGUES THAT
15 IT DOES NOT MAKE SENSE FOR GTE TO SET AN IMPLEMENTATION
16 SCHEDULE FOR REAL-TIME INTERACTIVE INTERFACES UNTIL IT
17 HAS ASSESSED WHAT IS REQUIRED TO COMPLETE SUCH ACTIVITY.
18 IS THIS REASONABLE?

19 A. MCI does not expect that real-time interactive interfaces will be in place January
20 1, 1997. What MCI does expect is that GTE should be in the process now of
21 assessing what is needed to make these interfaces a reality, and that GTE
22 establish a time-table for development and implementation to which it can be
23 held accountable.

24
25 The issue of ordering and provisioning for local service is now before the

1 industry Ordering and Billing Forum ("OBF"). That group has published the
2 initial draft of the Local Service Ordering Guideline and the Local Service
3 Request Industry Support Interface. While many issues remain, GTE should be
4 now actively assessing what it will take to achieve the requested interfaces.

5
6 There is a very unique situation which exists with GTE. GTE is already in the
7 long distance business here in Florida. Electronic bonding - a real-time,
8 electronic interface - is already in place for access repair and maintenance. A
9 real-time interactive interface for provisioning access is scheduled to be
10 deployed by the industry in the first half of 1997. Similarly, after years of
11 development, real-time interactive interfaces for PIC processing are close to
12 becoming a reality. Here sits GTE in MCI's business with all sorts of advanced
13 technology to facilitate its service to its customers, while MCI is expected to
14 accept electronic interfaces to be available at some unknown date in the future,
15 without even a plan by GTE to move to real-time interactive interfaces. GTE,
16 the local monopolist, appears to have all the advantages in this scenario with
17 parity not even a glimmer in anyone's eye.

18

19 Q. AT PAGE 15 OF HIS TESTIMONY, MR. LANGLEY EXPLAINS HOW
20 CBSS IS DIFFERENT FROM CABS. HE ASSERTS THAT ALECs SHOULD
21 GET BILLING FROM CBSS AS THAT IS HOW GTE BILLS END USERS.
22 WHY IS CBSS BILLING NOT ADEQUATE FOR MCI?

23 A. MCI is not attempting to tell GTE what system to use to produce bills to MCI
24 for resold services and unbundled elements. MCI is requesting that GTE
25 produce a bill in CABS billing data format. This is an industry standard format

1 that will enable MCI to build one system to receive and audit ILEC rather than
2 having to build multiple interfaces and audit systems. In addition the CABS
3 format has a number of features such as tracking of claims and adjustments that
4 are much better suited to the volume purchases that MCI will be making.

5
6 At OBF 55 held in August, 1996, final closure was reached on the specifications
7 for CABS formatted billing data for resold local service. NYNEX and Pacific
8 Bell are already moving towards implementation of billing for resold services in
9 the CABS billing data format. They began work before there was even final
10 closure of the issue.

11
12 It will create a significant barrier to entry if MCI is required to accommodate
13 multiple bill formats for receipt and auditing of bills. Billing is just as critical
14 to market entry as the ability to order and provision service.

15
16 Q. AT PAGES 16-19 OF HIS TESTIMONY, MR. LANGLEY TALKS ABOUT
17 HOW GTE INTENDS TO HANDLE REPAIR. IS HE CORRECT IN HIS
18 ASSESSMENT OF ON-LINE ACCESS TO GTE'S TROUBLE
19 MAINTENANCE SUPPORT SYSTEMS TO OBTAIN STATUS
20 INFORMATION AND CLOSE TROUBLE TICKETS?

21 A. No. Today GTE provides an on-line interactive repair interface for access
22 services. Trouble information is entered, status is monitored, and tickets are
23 closed on-line. While it does take time to build such an interface, GTE is
24 already enjoying the benefits of such technology as a competitor to MCI in the
25 long distance industry. Just as with ordering and provisioning, industry forums

1 are addressing this issue for local service. GTE should be required to establish
2 a schedule for development and implementation consistent with the development
3 of standards and schedules in the industry forums.
4

5 Q. AT PAGE 19 OF HIS TESTIMONY, MR. LANGLEY STATES THERE
6 WILL BE NO HARM TO THE ALECs IF THEY DO NOT HAVE REAL-
7 TIME INTERACTIVE INTERFACES FOR REPAIR. WHY ARE SUCH
8 INTERFACES IMPORTANT?

9 A. GTE proposes that MCI place phone calls to GTE to relay customer trouble.
10 This ineffective means to process customer troubles will put MCI at a significant
11 competitive disadvantage. The availability of real-time interactive interfaces is a
12 key driver of the timeliness of repair. This is reflected in MCI's experience
13 with access trouble reports, where electronic bonding is used to report, status
14 monitor, and close trouble tickets.
15

16 Q. AT PAGES 38-40 OF HIS TESTIMONY, MR. LANGLEY DISCUSSES
17 SERVICES STANDARDS. WHAT IS WRONG WITH THE GTE POSITION?

18 A. If the GTE position were to be adopted a new entrant who utilizes any ILEC
19 service, whether resold or an unbundled element, would be in effect precluded
20 from ever offering service of a quality better than the ILEC. MCI wants to
21 compete based on price, product innovation and service quality. If GTE is
22 allowed to maintain its position, the ability for MCI to win and retain customers
23 based on service quality will never be allowed to develop. GTE also states that
24 it does not believe it should be held accountable for meeting service level
25 standards. This monopolist view of the world does not have place in a

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

competitive environment. If MCI cannot hold GTE accountable for meeting service levels it will never be able to make commitments to its customers, further stifling the growth of competition.

Mr. Inkellis will be providing more information on what liability and indemnity provisions are appropriate to be included in the arbitrated agreement between MCI and GTEFL.

Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.