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GTE FLORIDA INCORPORATED

REBUTTAL TESTIMONY OF DOUGLAS N. MORRIS

DOCKET 960980-TP

960847

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Douglas N. Morris. My business address is 600 Hidden Ridge, Irving, TX, 75038.

**Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING?**

A. Yes, I did.

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A. The purpose of my rebuttal testimony is to address certain positions addressed by MCI witness Caplan.

**Q. MR. MORRIS, MCI WITNESS MR. DREW CAPLAN SUGGESTS IN HIS TESTIMONY ON PAGE 37, LINES 21-25, AND PAGE 38, LINES 1-4, THAT TWO SIGNALING POINTS OF INTERCONNECTION (SPOIS) BE ESTABLISHED IN EACH LATA, WITH ONE SELECTED BY EACH PARTY. IS THIS A REASONABLE SUGGESTION?**

A. Yes. As previously indicated in my testimony, MCI may designate the appropriate locations for the "SPOIs" referred to in Mr. Caplan's testimony.

**Q. MR. CAPLAN FURTHER SUGGESTS ON PAGE 38, LINES 5-7 OF**

DOCUMENT NUMBER-DATE  
10491 SEP 30 1988  
RECORDS/REPORTING

1           **HIS TESTIMONY, THAT THERE BE NO EXPLICIT CHARGE FOR**  
2           **STP PORTS. DO YOU AGREE WITH THAT STATEMENT?**

3    A.    No.    Because of the varieties of possible interconnection and  
4           supporting activities required, GTE will charge MCI and other carriers  
5           for the appropriate number of STP ports required on GTE's STPs.

6

7    **Q.    MR. CAPLAN ON PAGE 38, LINES 8-16 OF HIS TESTIMONY,**  
8           **OUTLINES THE CONNECTIVITY PROPOSED BY MCI FOR**  
9           **INTERCONNECTION WITH GTE'S SIGNALING NETWORK. DO**  
10          **YOU AGREE WITH THE CONNECTIVITY STATEMENTS?**

11   A.    Yes and no. The first bullet refers to ISDN User Part (ISUP) signaling  
12          for calls between MCI and GTE switches. I agree with that  
13          characterization if it is specific to exchange or exchange access calls  
14          where the signaling interconnection is to the GTE STPs located in the  
15          same LATA. The second bullet refers to ISUP signaling with regard  
16          to calls between MCI and other networks that "transit through the  
17          ILEC switched network". The meaning of "transit through the ILEC  
18          switched network" is not clear in this context. GTE will signal for  
19          exchange or exchange access calls between two other carriers, if  
20          those carriers are both interconnected with GTE's switched network.  
21          The third bullet refers to Transaction Capability Application Part  
22          (TCAP) messaging to query call-related databases or in support of  
23          CLASS services. GTE will support TCAP messaging for CLASS  
24          services. Querying GTE's LIDB and DB800/888 databases will be  
25          supported in accordance with my testimony. AIN services are

1 covered by Mr. Dellangelo.

2

3 **Q. ON PAGE 39, LINES 11-14 OF HIS TESTIMONY, MR. CAPLAN**  
4 **SETS FORTH THE REQUIREMENT THAT GTE MUST PROVIDE**  
5 **"MCI BILLING AND RECORDING INFORMATION TO TRACK**  
6 **DATABASE USAGE", IN ORDER FOR MCI TO GAIN ACCESS TO**  
7 **CALL-RELATED DATABASES. IS THIS POSSIBLE?**

8 **A.** Not without a more specific request and more discussion.. It is not  
9 clear exactly to what "billing and recording information" refers.

10

11 **Q. MR CAPLAN ALSO REFERS ON PAGE 39, LINES 17-19 OF HIS**  
12 **TESTIMONY, TO STORAGE OF MCI'S CUSTOMER INFORMATION**  
13 **IN GTE'S LIDB, AND IN LINES 21-25 OF THE SAME PAGE OF HIS**  
14 **TESTIMONY, OUTLINES THE FUNCTIONS TO BE PROVIDED FOR**  
15 **MCI'S CUSTOMER INFORMATION STORED IN THE LIDB. IS THIS**  
16 **POSSIBLE?**

17 **A.** This capability is offered to LECs by GTE as "LIDB Storage", under  
18 contract. The functions requested are provided for queries to the  
19 LEC's customer information.

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22 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

23 **A.** Yes, it does.

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