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1 REBUTTAL TESTIMONY OF RONALD MARTINEZ

2 ON BEHALF OF MCI

3 DOCKET NO. 961230-TP

4 NOVEMBER 19, 1996

5

6 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

7 A. My name is Ronald Martinez and my business address is 780 Johnson Ferry  
8 Road, Atlanta, GA 30342.

9

10 Q. HAVE YOU PREVIOUSLY FILED DIRECT TESTIMONY IN THIS  
11 DOCKET?

12 A. Yes.

13

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

15 A. My testimony responds to the testimony of Mr. Hunsucker with regard to the  
16 timetable for real-time interactive access to operations support systems, the  
17 timetable to implement CABS-formatted billing for network elements and  
18 resold services, and the requirements for pre-ordering access to customer  
19 service records.

ACK \_\_\_\_\_

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APP \_\_\_\_\_

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Q. MR. HUNSUCKER STATES THAT SPRINT AGREES CONCEPTUALLY  
THAT ELECTRONIC BONDING TO OPERATIONS SUPPORT SYSTEMS  
IS NECESSARY, BUT THAT SUCH INTERFACES ARE NOT  
AVAILABLE AT THE CURRENT TIME. (PAGES 16-17) WHAT ACTION  
SHOULD THE COMMISSION TAKE TO ENSURE THAT SUCH

1 INTERFACES ARE PROVIDED IN A TIMELY MANNER?

2 A. Sprint should be required to provide electronic bonding as quickly as possible.  
3 Standards for such interfaces have been adopted in the access arena and are  
4 currently being implemented. Those same standards can be adapted to apply  
5 to services in the local arena. Sprint does not give any real indication of when  
6 it expects to have such interfaces available, nor does it give any indication of  
7 what type of interfaces -- electronic or otherwise -- it intends to provide on an  
8 interim basis. Given the critical importance of real-time, interactive  
9 interfaces, the Commission should establish a date certain for Sprint to  
10 implement such interfaces. If Sprint cannot meet the Commission's deadline,  
11 Sprint should be required to report to the Commission why it cannot meet that  
12 deadline, the dates by which such systems will be implemented, and a  
13 description of the system or process which will be used in the interim.

14  
15 Q. MR. HUNSUCKER STATES THAT THE COST OF ANY INTERIM  
16 INTERFACES SHOULD BE RECOVERED EITHER FROM MCI, OR ON A  
17 COMPETITIVELY NEUTRAL BASIS FROM THE CARRIERS WHO  
18 BENEFIT FROM THE INTERIM SYSTEMS. (PAGE 17) IS THIS  
19 APPROPRIATE?

20 A. No. Some interim systems must be in place in order to facilitate the ordering,  
21 installation, and maintenance of services and facilities provided by Sprint to  
22 MCI. Both carriers will depend on these systems, and both carriers will have  
23 to perform development work to ensure that their systems can work together.  
24 Since both carriers will benefit, it is appropriate for each carrier to bear its  
25 own cost of system development. This is particularly true when the interim

1 systems are replaced by permanent systems that will make the provisioning of  
2 wholesale services and network elements more efficient for both parties.

3

4 Q. DOES SPRINT AGREE TO PROVIDE MCI WITH PRE-ORDERING  
5 ACCESS TO CUSTOMER SERVICE RECORDS?

6 A. Yes, but it is not clear what type of customer authorization Sprint expects to  
7 receive. (Hunsucker, page 17-18) It is my understanding a verbal  
8 authorization from the customer to MCI is sufficient authorization. MCI  
9 therefore proposes to provide Sprint with a blanket letter of authorization  
10 which certifies that MCI will obtain access to CSRs only when it has verbal  
11 authorization from the customer. The Commission should reject any attempt  
12 by Sprint to impose a more onerous documentation requirement.

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14 Q. MR. HUNSUCKER STATES THAT SPRINT WILL PROVIDE MCI WITH  
15 BILLING FOR UNBUNDLED NETWORK ELEMENTS IN A CABS  
16 FORMAT BY EARLY IN THE THIRD QUARTER OF 1997. (PAGE 39-40)  
17 DOES THIS RESOLVE MCI'S CONCERNS REGARDING THE FORMAT  
18 OF BILLING INFORMATION?

19 A. While MCI would like to see CABS formatted billing as quickly as possible, it  
20 can accept Sprint's proposal to provide billing for unbundled network elements  
21 in that format by the third quarter of 1997. However, it is essential that CABS  
22 formatted billing be implemented for resold services as well, and it appears  
23 that Mr. Hunsucker does not address billing for such services.

24

25 Q. IS THERE INDUSTRY AGREEMENT ON THE USE OF CABS

1           **FORMATTED BILLING FOR RESOLD SERVICES?**

2           **A.**    Yes. At the industry Ordering and Billing Forum ("OBF") 55 held in August,  
3                   1996, final closure was reached on the specifications for CABS formatted  
4                   billing for resold services. MCI is simply requesting that it receive bills for  
5                   resold services in the format specified at the OBF. MCI does not care what  
6                   system Sprint uses to prepare the bills, although it does object to Sprint  
7                   providing resale billing in a non-standard format which would require MCI to  
8                   build numerous front ends for data receipt, as well as different systems for bill  
9                   audit.

10

11                   The LECs typically use proprietary systems such as CRIS to bill end user  
12                   customers. OBF has consciously decided not to develop standard formats for  
13                   CRIS billing. It will create a significant barrier to entry for MCI and other  
14                   ALECs if they are required to accommodate multiple bill formats for receipt  
15                   and auditing of billing data for resold services. Sprint and the FCC have both  
16                   acknowledged the importance of industry standards for the processes used to  
17                   implement local competition. Billing is just as critical to successful market  
18                   entry as ordering and as such Sprint should be required to produce a bill for  
19                   resold services in an industry standard billing format.

20

21           **Q.**    **HAVE OTHER LECS COMMITTED TO PROVIDING BILLING FOR**  
22                   **RESOLD SERVICES USING THE CABS DATA FORMAT?**

23           **A.**    Yes, NYNEX began producing bills for resold services in OBF CABS format  
24                   effective October 1, 1996. NYNEX took the output from its CRIS system and  
25                   reformated it to the OBF CABS billing data format for resold services. Pacific

1 Bell is today using a CABS data format for certain services and is moving  
2 towards full implementation of OBF billing data formats for resold services.  
3 Both these RBOCs began development work on the CABS billing format for  
4 resold services in advance of final closure on this issue at the OBF.

5  
6 Q. PLEASE EXPLAIN SOME OF THE REQUIREMENTS CONTAINED IN  
7 THE CABS BILLING DATA FORMAT THAT THE CRIS BILLING  
8 FORMAT FAILS TO PROVIDE.

9 A. There are a number of requirements for billing resold services contained in the  
10 OBF CABS billing data tape or feed format that are not provided in CRIS  
11 billing. Let me describe a few of the key missing outputs.

12

13 There is no adjustments section on the CRIS bill that can be related to claims  
14 for misbilling. This is a key requirement so that, as disputes are resolved,  
15 MCI can track their resolution. Even more important, there is no reflection of  
16 the products and services to which customers subscribe. In the CRIS  
17 environment, only the initial customer bill reflects detailed customer service  
18 information. Thereafter features and functions are not ordinarily broken out  
19 on monthly bills. This information is critical for MCI to insure it is paying  
20 only for services that it has purchased.

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22 Moreover, if there are different bill outputs based on whether the purchase is  
23 in the initial month or not, MCI would be required to build multiple auditing  
24 systems to audit the CRIS bills. Finally, the CRIS bills fail to have  
25 jurisdictional indicators or provide total minutes of use.

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2 A. Yes.

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