1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY OF RONALD MARTINEZ**

3 **ON BEHALF OF MCI TELECOMMUNICATIONS CORPORATION**

4 **DOCKET NO. 960786-TL**

5 **July 17, 1997**

6

7

8 **Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION.**

9 A.   My name is Ronald Martinez. My business address is 780 Johnson Ferry Road,

10   Atlanta, Georgia 30342. I am employed by MCI Telecommunications

11   Corporation ("MCI") in the Law and Public Policy group as an Executive Staff

12   Member II. My responsibilities in my current position include working with the

13   MCI business units to ensure timely introduction of products and services.

14

15 **Q. PLEASE PROVIDE INFORMATION ON YOUR BACKGROUND AND**

16   **EXPERIENCE.**

17 A.   In my previous position at MCI, I managed the business relationships between

18   MCI and approximately 500 independent local exchange companies ("LECs")

19   in twenty-one states. I have experience in network engineering, administration

20   and planning; facilities engineering, management and planning; network sales;

21   and technical sales support. Prior to joining MCI, I was the Director of Labs

22   for Contel Executone for several years. Before that, I worked for 16 years in

23   the Bell system in numerous engineering, sales and sales support functions. I

1		have a Master of Science degree in Operations Research, and a Bachelor of
2		Science degree in Electrical Engineering from the University of New Haven. I
3		was one of the principal negotiators in the negotiations between BellSouth and
4		MCI which was conducted pursuant to Section 252 of the Telecommunications
5		Act of 1996(the "Act").
6		
7	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
8	A.	The purpose of my testimony is to provide information to the Florida Public
9		Service Commission ("Commission") to assist the Commission in their
10		evaluation of the BellSouth Operation Support Systems ("OSS"). In regards to
11		BellSouth's OSS, I will discuss: (1) the readiness, or lack thereof, of
12		BellSouth's OSS systems to support competition in local exchange services; (2)
13		the ways in which BellSouth's OSS systems fail to provide parity to a
14		competing Alternative Local Exchange Carrier ("ALEC"); and (3) other issues
15		that raise fundamental questions about BellSouth's capabilities to support
16		competition in the local telephone service market.
17		

18   **OPERATIONS SUPPORT SYSTEMS**

19   **(Commission Issues No. 3 and 15)**

20		
21	Q.	BEFORE DISCUSSING THE PARTICULAR ISSUES RAISED BY THE
22		CURRENT STATE OF BELLSOUTH'S OSS FUNCTIONS, CAN YOU

1   **PROVIDE SOME GENERAL BACKGROUND ABOUT OSS**

2   **FUNCTIONS?**

3 A.   Yes. Operations Support Systems, or OSS, consist of all the computerized and

4   automated systems, together with related business processes, that ensure that a

5   telecommunications carrier can satisfy customer needs and expectations. In the

6   developing competitive environment, carriers will not be able to compete

7   without powerful and efficient wholesale support processes for resale services

8   and unbundled elements which must support the following:

9   1. Pre-ordering

10   2. Ordering

11   3. Installation

12   4. Repair and Maintenance

13   5. Billing

14   Like all BOCs, BellSouth has for years utilized highly complex OSS systems to

15   successfully manage its internal processes and customer interactions. These

16   well-tested systems ensure, for example, that customer service representatives

17   have immediate real-time access to all information necessary to respond fully

18   and correctly to customer queries about such things as the variety and prices of

19   services available, or the status of repair calls. They also ensure, among other

20   things, that customer orders are correctly processed and that bills are timely,

21   complete, and accurate.

22

1 **Q. WILL THE ILECS' OSS NEED TO BE MODIFIED TO SUPPORT**

2 **LOCAL COMPETITION?**

3 A. Yes. Consistent with the Act, Incumbent Local Exchange Carriers ("ILECs")

4 must make changes to their OSS to enable competition to develop in local

5 markets. To the extent new competitors such as MCI must rely on the ILECs'

6 networks and OSS capabilities for a realistic opportunity to compete, it will be

7 essential for the ILECs to develop and implement OSS interfaces and

8 downstream processes sufficient to ensure that they can provide unbundled

9 network elements and resale in a timely, reliable, and nondiscriminatory fashion

10 in volumes adequate to satisfy demand. In addition, the FCC's rules specifically

11 require that ILECs develop interfaces capable of providing ALECs

12 nondiscriminatory unbundled access to its OSS functions themselves. The U.S.

13 Department of Justice ("DOJ"), in its Evaluation dated May, 16, 1997 in the

14 SBC-Oklahoma Section 271 case (CC Docket No. 97-121) ("DOJ Evaluation")

15 at page 27 stated:

16

17 [T]he department will evaluate (1) the functions BOCs make

18 available; and, (2) the likelihood that such systems will fail

19 under significant commercial usage. Overall, the Department

20 will consider whether a BOC has made resale services and

21 unbundled elements as well as other checklist items,

22 practicably available by providing them via wholesale support

23 processes that (1) provide needed functionality; and (2)

1   operate in a reliable, nondiscriminatory manner that provides

2   entrants a meaningful opportunity to compete.

3

4   These requirements mean, at a minimum, that ILECs must provide parity to

5   requesting ALECs in at least three respects: the scope of information available,

6   the accuracy of information supplied, and the timeliness of communications.

7

8   Q.   **PLEASE EXPLAIN HOW THE COMMISSION SHOULD DETERMINE**

9   **WHETHER THESE REQUIREMENTS ARE MET.**

10 A.   In order to determine whether a BOC has satisfied these requirements --

11   namely, that it has implemented OSS systems and interfaces capable of ensuring

12   that it can "fully implement" the competitive checklist, and that it provides

13   nondiscriminatory unbundled access to OSS functions and databases -- two

14   questions are key: First, are the interfaces and specifications the BOC employs

15   to communicate with the ALECs adequate to fulfill pro-competitive needs?

16   Second, assuming the BOC proposes to use a competitively acceptable interface

17   to provide competitors access to a particular OSS function, has there been

18   sufficient experience with the interface and associated systems and processes so

19   as to ensure they will work "as advertised"? To this end, the DOJ Evaluation at

20   page 29, noted:

21   In determining whether a BOC's wholesale support

22   processes can provide the necessary functionality, the

23   Department will view internal testing by a BOC as

1		substantially less persuasive evidence than testing with other
2		carriers, and testing in either manner as less persuasive
3		evidence than commercial operation.
4		
5	Q.	**PLEASE ELABORATE ON THE DIFFERENT TYPES OF OSS**
6		**INTERFACES.**
7	A.	In theory there are numerous ways an ALEC might be able to access BOC OSS
8		functions. One basic distinction is between the modern automated electronic
9		interactive access and the more primitive manual access. Manual access means
10		that the ALEC's access is mediated by human intervention on the part of the
11		BOC or, by virtue of the BOC interface, mediated by human intervention on the
12		part of the ALEC. For example, when an ALEC orders a resale service or
13		unbundled element manually, it ordinarily means that the ALEC transmits an
14		order form to the BOC by facsimile, at which point a BOC employee types the
15		information supplied on the form into the BOC's computerized order entry
16		system. Manual intervention also occurs when, after information is exchanged
17		electronically, a BOC representative must re-enter or otherwise manipulate it
18		before it can be processed downstream.
19		
20		Conversely, a manual intervention requirement can also be imposed on the
21		ALEC, by virtue of the interface provided by the BOC. For example, an ALEC
22		may be required to enter an order separately into its own system and then
23		reenter the order into the BOC's system. This duplicate manual entry on the

1   part of the ALEC would be costly both in time and dollars but not be a cost that

2   would be incurred by the BOC. The BOC representatives could, by virtue of

3   their direct access to databases, assemble information and automatically

4   process their orders on line. Another example of manual intervention on the

5   part of the ALEC might be the simple task of verifying an address. If a BOC

6   representative's system were to routinely check and correct for normal typing

7   errors during the course of order entry and correctly populate these in the

8   proper fields of the order while the ALEC had to manually select a database

9   then retype the correction into the order it was creating, then the OSS system

10   supplied to the ALEC is manual. This would be true even though the system

11   was accessed electronically by the ALEC and, once connected, was interactive

12   with respect to that specific database of the BOC. The fact would still remain

13   that the system was not provided in a manner that permitted it to be interactive

14   with the ALEC's system. This would certainly be true where a BOC requires an

15   ALEC to access different and diverse systems for pre-ordering and Ordering

16   functions while the BOC itself treats these functions as a chain of serial events

17   on a common system.

18

19   To this end, the DOJ Evaluation at page 26, states:

20   Because each BOC has millions of access lines, meaningful

21   compliance with the requirements that the BOC make

22   available resale services and access to unbundled elements

23   demands that the BOC put in place efficient processes, both

1   electronic and human, by which an ALEC can obtain and

2   maintain these items in competitively-significant numbers.

3   The checklist requirements of providing resale services and

4   access to unbundled elements would be hollow indeed if the

5   efficiency of -- or deficiencies in -- these "wholesale support

6   processes," rather than the dictates of the marketplace,

7   determined the number or quality of such items available to

8   competing carriers.

9

10 Q. **PLEASE DESCRIBE THE VARIOUS TYPES OF AUTOMATED**

11   **ACCESS THAT COULD BE PROVIDED.**

12 A. Automated access means that information is directly exchanged between the

13   ALEC and BOC computers. This can be done through a variety of different

14   interfaces and protocols that range widely in degrees of sophistication and

15   utility.

16

17   The most sophisticated type of automated access is termed *electronic bonding*

18   ("EB"). Electronic bonding solutions are the most sophisticated and useful

19   because, in certain applications, they can allow new entrants to approximate the

20   same real-time access to the BOC's functions as the BOC itself enjoys. From

21   the customers' perspective, interactions with an ALEC that has electronically

22   bonded to the ILEC are indistinguishable from interactions with the ILEC.

23   Furthermore, because electronic bonding links the ALEC's existing OSS system

1   to that of the ILEC, the ALEC does not need to develop a new OSS interface

2   to communicate with the ILEC for a given function.

3

4   Less sophisticated automated access arrangements involve the transfer of data

5   between computer systems in batches. These "batch transfer" solutions work

6   much like electronic mail, but are much more rigorously structured in terms of

7   format, syntax, and vocabulary. The standard batch transfer interface for most

8   applications, Electronic Data Interface ("EDI"), is also termed a "transactional"

9   interface because it has long been used for ordinary business transactions like

10   exchanging bills of lading or service orders. File transfer protocol, perhaps the

11   classic batch interface, transmits large amounts of data at scheduled and

12   infrequent intervals.

13

14   Q.   **ARE MANUAL INTERFACES ADEQUATE TO SUPPORT LOCAL**

15   **COMPETITION?**

16   A.   No. Manual access arrangements are not compatible with MCI's needs as a

17   new entrant seeking to compete against an incumbent LEC. Every manual

18   intervention causes delay, sometimes substantial, and creates significant risk of

19   error. By relying upon manual interventions, the ILEC can hold its competitors

20   hostage to its own response time, hours of operation, and ability (or incentive)

21   to provide accurate information. Also, manual arrangements increase ALECs'

22   costs in two ways: First, ALECs must employ more people to handle the

23   process and to audit the ILEC's performance. Second, and similarly, these

1		arrangements increase the ILEC's costs by requiring more employees to input
2		data, etc., and the ILEC is likely to try to pass its own inflated costs through to
3		the ALECs. Accordingly, solutions that require manual intervention on the
4		ILEC's side cannot be acceptable in either the short or long term.
5		
6	Q.	WHAT AUTOMATED ACCESS ARRANGEMENTS WOULD BE
7		SATISFACTORY?
8	A.	Each ILEC should adopt the automated interfaces and data formats adopted
9		and approved by the relevant national standard-setting bodies or industry
10		forums. The three principal groups are: the Ordering and Billing Forum
11		("OBF") of the Carrier Liaison Committee; the T1 Committee; and the
12		Electronic Communications Implementation Committee ("ECIC"). All three
13		are sponsored by the Alliance for Telecommunications Industry Solutions
14		("ATIS") and accredited by ANSI. ILECs should adopt standardized systems
15		for two reasons.
16		
17		First, for ALECs that hope to compete in markets presently controlled by
18		different BOCs it is absolutely critical that interfaces are uniform. The costs of
19		developing systems and software and of training necessary to use any particular
20		interface are substantial. This is why most BOCs try to unify their own
21		systems. BellSouth, for example, uses essentially the same OSS interfaces and
22		formats throughout its region and has a single OSS service center for ALECs,
23		the Local Customer Service Center, to serve all of the states within its region.

1   A nationwide ALEC like MCI must be able to realize similar economies. We

2   can only do so, however, if the several large ILECs conform to nationally

3   standardized interfaces and formats.

4

5   To this end, the DOJ Evaluation at page 73, states:

6   The Department views as critical a BOC's meaningful

7   commitment to comply with emerging industry standards. If

8   all BOCs adhere to the same standard it will ultimately

9   reduce the need for competitors to build separate interfaces

10   for each BOC, lowering competitor costs and facilitating

11   faster development of such interfaces.

12

13   Second, the industry forums are well positioned to resolve which interfaces and

14   formats are reasonably necessary and practical for each particular OSS function

15   or sub-function.   Different functions and services may create different OSS

16   needs. While electronic bonding solutions -- with their real-time accessibility --

17   are essential for any function that is conducted while the carrier's service

18   representative is actually speaking with the end-user (such as all pre-ordering

19   functions), some sorts of batch transfer solutions might adequately serve

20   competitive needs for other functions.

21

22   For both of these reasons, I agree with the FCC that "[i]deally, each incumbent

23   LEC would provide access to support systems through a nationally

1   standardized gateway." See FCC, First Report and Order, paragraph 527 (Aug.

2   8, 1996). Similarly, I agree with the DOJ's view of the criticality of a BOC's

3   meaningful commitment to comply with emerging standards. Consistent with

4   these views, MCI is investing its development monies for OSS in the technical

5   interface solutions developed through the industry forums. The FCC has

6   chosen to rely on the carriers to agree to nationally standardized interfaces

7   voluntarily. The likelihood that the large ILECs and ALECs will reach

8   voluntary consensus on nationally uniform interfaces will be sorely tested if the

9   BOCs are allowed to offer in-region long distance services before such

10   solutions are adopted. Because the time and incremental capital investment

11   required for ALECs to develop non-standard OSS interfaces represents a

12   considerable barrier to entry, regulatory incentives toward standardization are

13   critical.

14

15 Q. **IN THE ABSENCE OF INDUSTRY STANDARDS, WHAT OSS**

16   **INTERFACES SHOULD ILECS ADOPT?**

17 A.   While the industry forums have made substantial progress, they have not yet

18   established standards for all OSS functions. In particular, they have not

19   finalized interfaces and standards for the information exchanges that typically

20   occur before an ALEC actually places an order with an ILEC. To the extent

21   that standard-setting forums have not yet adopted standards for all functions,

22   the BOC should be expected to adopt the least costly interim solution that

23   would give requesting carriers the same level of access to the BOC's OSS

1   *functions as the BOC itself enjoys.* It is not reasonable for individual large

2   ILECs to implement any interim solutions that would require ALECs to commit

3   substantial resources of their own to access the ILEC's solution when equally

4   adequate interim solutions can be devised that would prove less costly to the

5   ILEC's would-be local competitors.

6

7   With respect to interim solutions and, for that matter, long-term solutions that

8   would give requesting carriers the same level of access to the BOC's OSS

9   functions and/or databases as the BOC itself enjoys, it is not sufficient to

10   provide access similar to that which a BOC representative has. Quite often, a

11   BOC will restrict, for business reasons, access to data and/or subsets of data

12   from their Business Office Representative. An example of this is number

13   reservations. A BOC Marketing Organization typically prescreens numbers that

14   might spell a word (i.e. 225-5624 spells CALL-MCI) from new NPAs being

15   established in their serving area. To control the assignment of these numbers, a

16   BOC representative would be restricted from accessing this number and would

17   need to contact the controlling party to obtain a release of this number for the

18   customer. The ultimate release of the number and/or the search for a

19   compatible number would be controlled by the BOC's business practices. An

20   ALEC, like MCI, must have access to the database containing these valued

21   numbers and visibility into the database at parity with the BOC itself, not merely

22   at parity with the Business Office Representative of the BOC.

1 Q. **WHAT TEST SHOULD THE COMMISSION APPLY IN**

2 **DETERMINING WHETHER BELLSOUTH'S OSS INTERFACES ARE**

3 **SUFFICIENT TO ENABLE IT TO MEET THE CHECKLIST**

4 **REQUIREMENTS?**

5 A. A BOC's OSS interfaces should be deemed satisfactory only if these conditions

6 are satisfied: (1) Wherever there exists an existing industry standard, the BOC

7 must have adopted and implemented it; and (2) wherever an industry standard

8 does not yet exist, the BOC must (a) enter into a binding contractual

9 commitment (backed up by adequate contractual and regulatory penalties) to

10 comply with industry standards as soon as possible (pursuant to a specified

11 implementation schedule) and (b) offer and implement an interim solution that

12 gives requesting carriers the same level of access that the BOC's operational

13 groups have to its systems and that is as consistent as possible with expected

14 industry standards. Because OSS interfaces, like other software packages and

15 operating protocols (e.g., WordPerfect and Microsoft Windows) are

16 periodically updated and improved, conformance with industry standards entails

17 adoption of the most advanced available specifications for a given standardized

18 interface. For example, that would mean BOCs should presently be using the

19 long-available EDI issue 6.0 for ordering functions and should shortly transition

20 to the recently OBF-approved issue 7.0. The DOJ Evaluation recognized this

21 requirement in footnote 98, at page 73:

22 ATIS committees have previously performed translations or

23 "mappings" of telecommunications ordering forms to be

1   used between large business customers and their

2   telecommunications carriers. These previous mappings,

3   known as Issue 5 and Issue 6, were used by some carriers to

4   implement partially standardized electronic transactions

5   between BOCs and ALECs prior to the stabilization of the

6   issue 7 draft. Any changes made to issue 7 before its final

7   release will have to be implemented by carriers using

8   prerelease drafts.

9

10 **Q.**   **WHAT OSS CAPABILITIES ARE NECESSARY, BEYOND**

11   **ELECTRONIC INTERFACES?**

12 **A.**   The adoption and implementation of an appropriate OSS interface, configured

13   to appropriate specifications, is a necessary condition for the development of

14   local competition, but it is far from sufficient. The interface merely governs the

15   communication between the ILEC and ALECs. The theoretical capacity for

16   rapid and efficient communication between the carriers is of little use if either

17   the ILEC lacks the internal systems necessary satisfactorily to effect the

18   functions a particular interface is designed to support, or the ALEC lacks the

19   systems, software, and training needed to make efficient and effective use of the

20   OSS access provided. Therefore, before a BOC can establish that it will be able

21   to provide unbundled network elements or resale services in a competitively

22   acceptable manner, it must demonstrate both that its OSS interfaces are linked

23   to downstream systems that can provide the necessary services in a prompt and

1   trouble-free fashion and that it provides adequate training and support to

2   competing local carriers.

3

4   Once the ILEC has devised, tested, and implemented its interfaces, it must still

5   design, develop, test and implement business processes adequate to effect the

6   relevant inter-carrier business functions. Because this is a critical point, I would

7   like to elaborate.

8

9   First and foremost, BellSouth should adopt and commit to performance

10   measurements with penalties that would be assessed if BellSouth fails to live up

11   to these commitments. The DOJ Evaluation, at page 47, agreed with the need

12   for such a requirement:

13   The establishment of such performance measurements will

14   ensure the continued availability of functional and operable

15   wholesale support processes and signal to competitors and

16   regulators that the market has been irreversibly opened to

17   competition. With clear performance benchmarks in place,

18   both competitors and regulators will be better able to detect

19   and remedy any shortcomings in the BOCs delivery of

20   wholesale support services to its competitors.

21   The DOJ Evaluation also stated at page 48 that "the Department will pay close

22   attention to the adequacy of a BOC's established performance measures." With

23   respect to penalties, the DOJ Evaluation made the following statement in

1   footnote 60, page 48: "Another factor that is relevant to this showing is

2   whether the BOC has entered into, or is subject to, clear penalties for failing to

3   meet basic performance benchmarks, e.g. a time interval for provisioning

4   unbundled loops. In fact, the BellSouth in their Negotiations Handbook for

5   collocation expects an ALEC to pay "liquidated damages" on damages caused

6   by the behavior of an ALEC's employee. Hence, the concept of damages for

7   failure to perform does not appear foreign to BellSouth.

8

9   Also, OSS is not just about inter-carrier interfaces. To the contrary, as

10   mentioned earlier, local exchange carriers rely on advanced OSS capabilities to

11   run their internal operations; these capabilities have nothing to do with the

12   particular LEC's relationship to other carriers. Some of these processes will

13   work essentially the same way whether the function at issue is performed for an

14   end-user or an ALEC. For example, when a customer orders an entirely new

15   line from a reseller, the reseller basically stands in the shoes of the BOC: If the

16   interfaces between the two carriers work as they should, the fact that the pre-

17   ordering and ordering processes are mediated through a new carrier (the

18   ALEC) should not add additional complication to the BOC's existing

19   provisioning systems. That is, the provisioning function itself should look much

20   the same regardless of whether the end-user takes that service directly from the

21   BOC or from a reseller of the BOC's service.

22

1   There are, however, other ways in which the new ALEC-ILEC relationship

2   imposes new burdens on the ILEC's downstream systems. For example, when

3   an ALEC resells an existing service to an existing ILEC customer, the

4   processing of that order requires a communication between the ILEC's ordering

5   and billing systems that the ILEC does not otherwise engage in for itself. In

6   other words, the ILECs were not required to migrate an existing line with

7   existing vertical services prior to the implementation of the resale requirements.

8   Similarly, when an ALEC orders unbundled elements, the new challenge for the

9   ILEC is not only to receive and understand that order (this is where the

10   ordering interfaces come in), but also to give effect to that order. Before the

11   1996 Act, the ILECs did not have OSS systems in place to effectuate the

12   unbundling of, for example, local switching. Today, however, ILECs must

13   provide additional personnel and material resources to support such ALEC

14   orders.

15

16   Assuming that an ILEC has deployed an appropriate interface and has

17   adequately tested downstream systems that can accommodate all foreseeable

18   demand in a nondiscriminatory fashion, it is critical that the ALEC is able to use

19   the ILEC's interfaces effectively. The ILECs have a responsibility to assist the

20   ALECs in this regard because the ILECs select the interface, tailor its

21   specifications and vocabulary, and control the timing of its implementation.

22   This responsibility holds even when a BOC adopts an interface approved by an

23   industry forum, as most industry-standard interfaces are very loosely defined to

1   allow individual carriers great flexibility in tailoring their own specifications.

2   Consequently, just as the market requires the manufacturer of a complicated

3   software package to provide initial and ongoing customer support, regulators

4   must ensure that the BOCs provide ALECs with adequate training, updates on

5   system changes and assistance -- including complete and intelligible manuals

6   and pull-down on-screen menus where necessary. With respect to updates, the

7   BOC should be required to provide timely informational updates on the systems

8   as they evolve and to ensure that the ALECs receive updates to the manuals

9   they obtain during training.

10

11   Q.   WHAT TESTING IS NECESSARY TO ENSURE THAT OSS

12   CAPABILITIES ARE FUNCTIONING PROPERLY?

13   A.   The process of ensuring that the business processes linked to a given OSS

14   interface work as planned is itself lengthy and requires careful planning and

15   testing. After each carrier's systems are developed and deployed, it is necessary

16   to conduct "integration" testing -- full end-to-end trials designed to make sure

17   that the systems can communicate properly with each other to accomplish the

18   intended results in the designed manner. After integration testing has been

19   successfully completed, the systems may be put into actual competitive use,

20   supporting "live" customer transactions. Even once this stage of actual

21   implementation is reached, however, testing is not completed. To the contrary,

22   it is almost inevitable that the early stages of actual competitive use will reveal

23   design and operating flaws that had escaped detection during integration

1   testing, thus requiring further trouble-shooting and system modification.

2

3   To this end, the DOJ Evaluation (footnote 39, page 29) quoted comments made

4   by the Wisconsin Department of Justice Telecommunications Advocate, in

5   their response to the Second Notice and Request for Comments in Docket No.

6   6720-TI-120, at 7 (Jan 27,1997):

7   In order for the systems to be considered operational, they

8   must satisfy two tests. First, Ameritech must demonstrate

9   that the systems incorporate sufficient capacity to be able to

10   handle the volumes of service anticipated when local

11   competition has reached a mature state...In addition, the

12   systems must have been proven adequate in fact to handle

13   the burdens placed upon them as local competition first

14   takes root.

15

16   From an OSS perspective, paper promises are not enough to ensure effective

17   real-world application. Because deploying "operationally ready" OSS is a

18   substantial and time-consuming undertaking, there is a real difference between

19   saying a system is ready and actually using it to provide services in a

20   commercially satisfactory way. In light of the innumerable potential glitches

21   and pitfalls that must be eliminated prior to commercial availability, one cannot

22   know how well things can be provided until they are supported by a full and

23   varied track record of having been provided. In short, OSS must be in real

1		competitive use (not merely promised) and subject to auditing and monitoring
2		of key performance indicators before OSS can be deemed to be operationally
3		ready.
4		
5	Q.	**PLEASE SUMMARIZE YOUR CONCLUSIONS CONCERNING THE**
6		**OSS CAPABILITIES GENERALLY REQUIRED TO SUPPORT**
7		**COMPETITION IN THE LOCAL TELEPHONE SERVICE MARKET.**
8	A.	As a general matter, any OSS system will need to meet three tests before it can
9		be certified as sufficiently robust to provide a foundation for competition in the
10		local service arena. First, the system must not rely on any manual interfaces for
11		basic functions, such as ordering loops or requesting customer service records.
12		Second, the system must comply with national industry standards. Otherwise,
13		ALECs will be forced to developed numerous, ILEC-specific interfaces, and
14		consumers will suffer by paying higher prices. Finally, and most fundamentally,
15		it will be impossible to determine whether a particular OSS capability can
16		support competition until the capability has been in actual, commercial use for a
17		meaningful period of time. For OSS capabilities, "the proof will be in the
18		pudding." Any other approach to evaluating the suitability of OSS capabilities
19		could lead to a premature endorsement of ILEC entry into long distance and,
20		accordingly, to serious anti-competitive consequences.
21		
22	Q.	**AT PRESENT, ARE BELLSOUTH'S OSS CAPABILITIES ADEQUATE**
23		**TO SUPPORT LOCAL COMPETITION?**

1   A.   No. In numerous respects, BellSouth's current OSS capabilities are inadequate

2   to support competition in the local exchange market. Many functions rely on

3   manual intervention, and ALECs can expect that substantial service problems

4   will result from these arrangements. Moreover, BellSouth's Local Exchange

5   Navigational System ("LENS") and Trouble Analysis Facilitation Interface

6   ("TAFI") do not adhere to the industry standards in the OSS arena and are

7   BellSouth Proprietary systems. As discussed above, without standard

8   interfaces, national ALECs such as MCI will find it prohibitively expensive to

9   compete against ILECs. ILECs in every region, or even every state within a

10   region, could generate idiosyncratic OSS requirements that would defeat any

11   economies of scale that ALECs might hope to achieve.

12

13   In its negotiations with MCI, BellSouth has committed to specified timelines for

14   implementing electronic bonding (EB). BellSouth has agreed to make EB

15   available for pre-ordering and ordering functions within one year after the

16   implementation of interexchange EB. With respect to local maintenance,

17   BellSouth has committed to implementing EB within one year of the effective

18   date of its interconnection contract with MCI. These paper promises, while

19   indicating BellSouth's intent to institute EB, should not be considered the

20   equivalent of actual, tested, in-use systems.

21

22   With that said, BellSouth's current OSS capabilities can be discussed in terms

23   of the five discrete functions performed by OSS: pre-ordering, ordering,

1   provisioning, maintenance & repair, and billing. The pre-ordering function

2   involves the exchange of information between carriers prior to, and in

3   anticipation of, the placing of an actual order. As opposed to pre-ordering,

4   which concerns interactions with customers to determine which services to

5   order, ordering relates to the processes required for an ALEC to submit an

6   actual order for either unbundled network elements or resold services.

7   Provisioning involves the exchange of information between carriers in which

8   one executes a request for a set of products or services from the other, with

9   attendant acknowledgments and status reports. Maintenance and repair relates

10   to how those two physical services will be provided, as opposed to ordering

11   and provisioning, which relate to how the need for those processes will be

12   communicated. Finally, OSS functions that support billing keep track of ALEC

13   and/or ALEC customer usage of ILEC services and facilities. Billing systems

14   also provide information in various formats from the ILEC to the ALEC, and

15   vice versa. I will discuss each of these OSS functions as they relate to

16   BellSouth's existing OSS capabilities for both facilities-based and resale

17   components.

18

19   Q.   ARE BELLSOUTH'S CURRENT PRE-ORDERING INTERFACES

20   ADEQUATE TO SUSTAIN LOCAL COMPETITION?

21   A.   No. At present, BellSouth's interfaces do not support many of the pre-ordering

22   requirements, especially the sub-functions supplying the real-time information

23   that ALECs will need to provide to their potential customers in order to have

1   any hope of competing against BellSouth. The overwhelming business

2   requirement for a pre-ordering interface is the ability of the ILEC system to

3   provide real-time, up-to-date information within seconds of an electronic

4   request -- while the customer is on the line. Anything short of this key

5   capability fails to meet customers' expectations for customer service from any

6   modern business organization, whether it is providing credit, insurance, catalog,

7   or telephone services.

8

9   This Commission has been at the forefront of state commissions in mandating

10   parity of access to operations support systems. See Order No. PSC-96-1579-

11   FOF-TP, Docket No. 960846-TP, pp. 76 to 86, and see FCC, First Report and

12   Order, paragraph 519 (Aug. 8, 1996) (CC Docket No. 96-98). Even so,

13   BellSouth is still operating on interim OSS systems. While it may be true that

14   ALECs such as MCI can "get by" with the interim OSS measures adopted by

15   BellSouth, the simple fact of the matter is that these measures cannot

16   realistically support local competition. Simply put, BellSouth's interim methods

17   for providing pre-ordering information to both facilities-based competitors and

18   resellers are clearly inadequate.

19

20   There are at least seven key pre-ordering sub-functions that must be provided

21   to all telecommunication carriers: (1) access to customer service records; (2)

22   the ability to select and reserve telephone numbers while the end-user is on-line;

23   (3) determination of features available to the end-user; (4) the ability to select

1		an order due date and to schedule any necessary outside work while the end-
2		user is on-line; (5) address validation; (6) access to a potential subscriber's
3		current directory listings; and (7) access to the information that an ALEC
4		would require at the pre-ordering stage in order to convert an existing
5		customer's services through an unbundling situation involving a second ALEC.
6		
7	Q.	ARE THESE FUNCTIONS ADEQUATELY PROVIDED THROUGH
8		BELLSOUTH'S LENS SYSTEM?
9	A.	No. It is important to note, the BellSouth Local Exchange Navigation System
10		(LENS) is not an industry standard and, in fact, is a BellSouth proprietary
11		system as noted on LENS: "1997 BellSouth Telecommunications. Inc. All
12		Rights Reserved". The industry has recently agreed that EDI via TCP/IP is the
13		proper preordering interface. In addition, LENS is a manual dedicated access
14		system that is incapable of integrating with an ALEC's OSS system. Further,
15		the back up for LENS is the LCSC which is only open Monday-Friday from
16		8:00 am to 5:00pm central standard time. MCIm's customers expect service
17		twenty-four hours a day and, moreover, BellSouth's own service centers are
18		open and operational twenty-four hours a day seven days a week. Thus, LENS
19		is insufficient to serve the ALEC's needs and is discriminatory against the
20		ALECs. Lastly, MCIm, after repeated requests, did not receive the technical
21		specifications associated with LENS until July 8, 1997, so that it could assess
22		the requirements of building an interface to this proprietary system. The
23		documentation provided previous to this was only the "LENS Users Guide"

1   which was represented as the technical specification. In regards to the LENS

2   USERS Guide, it is worth noting that there have been three revisions since

3   March and the knowledge that this Users Guide had changed was, in every

4   instance, obtained from sources other than BellSouth.

5

6   Q.   **PLEASE DISCUSS THE VARIOUS PRE-ORDERING FUNCTIONS**

7   **AVAILABLE IN LENS.**

8   A.   In BellSouth's LENS "USERS GUIDE", BellSouth offers four (4) of these

9   pre-ordering functions to ALECs through its LENS system. These functions

10   include: access to feature and service availability; access to the Regional Street

11   Address Guide ("RSAG"); access to telephone number assignment; and,

12   appointment scheduling (i.e. due date scheduling). Access to Customer

13   Records is also referenced in the Guide; however, access to customer records

14   has only recently become available (the pop down screen suddenly appeared in

15   the preordering section of LENS).

16

17   1. Customer Service Records

18 Q.   **PLEASE DESCRIBE HOW LENS PROVIDES ACCESS TO**

19   **CUSTOMER SERVICE RECORDS.**

20 A.   In its arbitration decision in Docket No. 960846-TP, this Commission found

21   that BellSouth must provide access for MCI to receive customer service

22   records. See Order No. PSC-96-1579-FOF-TP, pp. 79-81. While access to a

23   limited subset of the CRIS record has been provided to the ALEC, the LENS

1   system only allows the ALEC to print the Billing Name and Address page of the

2   CSR. Hence, an ALEC must write down all of the pertinent information before

3   proceeding to place an order on LENS.

4

5   CSRs are necessary for ALECs to place orders for both unbundled network

6   elements and resold services. The CSR contains information relating to the

7   services that the customer is currently receiving, as well as accurate billing

8   name and address information. Without this information, ALECs will find it

9   difficult to advise potential customers concerning the best mix of services to

10   meet their needs. The initial lack of immediate access to CSRs has, at a

11   minimum, created significant delays in ALECs' abilities to respond to customer

12   requests for service. Unlike BellSouth's service representatives, an ALEC's

13   customer service representative could not check that all of the customer

14   information needed to submit the order was correct without calling the

15   customer back to verify, after reviewing the CSR.

16

17   While MCI has only had a chance to view this feature in LENS, there is a

18   fundamental flaw in the LENS system that effects both the pre-ordering and

19   ordering sections. Ms. Calhoun captures the spirit of this flaw at page 18 of her

20   pre-filed testimony when she defines pre-ordering: "The FCC Part 51 rules

21   define preordering and ordering as including 'the exchange of information

22   between telecommunications carriers.'" Pre-ordering and ordering are joined at

23   the hip and are not separate and distinct functions as designed into LENS. A

1   BellSouth representative has access to all functions; as evidenced by Ms.

2   Calhoun's exhibits, the pull down screens are always present to access CSR

3   information and other functions. In LENS, the ALEC must print the screen

4   because nothing is saved once they pass onto the next phase. Even printing

5   screens will not save all the necessary information, since, as already stated, the

6   ALEC can only print the Billing Name and Address page of the CSR. Ms.

7   Calhoun notes on page 11 that "the data underlying the presentation screens

8   supplied through LENS is available for customization by an ALEC." While it

9   will be a while before MCI can fully evaluate this statement, it is quite apparent

10   that an ALEC choosing to use this system will have no other choice. This will

11   become more evident as I continue, but before I do, I would like to present an

12   example of this problem with respect to CSRs.

13

14   Assume that an ALEC has viewed the CSR data and wants to proceed to place

15   a simple order such as "Change As Is." One would not expect that a second

16   view of the CSR was necessary, but LENS requires the ALEC to input the IXC

17   PIC and IntraLATA PIC into the system before it will continue. This

18   information is required even though, by definition, the IXC PIC and the

19   IntraLATA PIC are not being changed by the order. To review the CSR in

20   order to view the PICs associated with this line, the customer service

21   representative must exit the Change As Is Ordering which deletes the document

22   the representative was working on. If the ALEC puts in the wrong PICs the

23   order is rejected because, of course, that is a change order and does not qualify

1   under the Change As Is. While the customer presumably knows their long

2   distance carriers, it is highly unlikely that they would know the related Carrier

3   Identification Codes ("CIC"). If the customer had been PICed to BellSouth for

4   intraLATA toll, there is no way that the end user customer, who never selected

5   BellSouth but was defaulted to them when intraLATA 1+ opened in Florida,

6   would know the CIC associated with BellSouth. Again, the BellSouth

7   representative is not denied access to this information when they are in the

8   order writing phase because there is no distinction between pre-ordering and

9   ordering. The only difference between these two phases is time. They are but

10   one continuous string of events that go back and forth between systems. Yet

11   LENS forces the ALEC to treat them as two completely separate processes.

12

13   2. Telephone Number Assignment

14 Q.   HOW DOES LENS HANDLE NUMBER ASSIGNMENTS?

15 A.   With respect to the OSS functions purported to exist within LENS, BellSouth

16   has designed a cumbersome interim method for customers to select telephone

17   numbers during pre-ordering in cases where an ALEC does not have an NXX

18   code. Instead of permitting ALECs to access BellSouth's telephone reservation

19   system, BellSouth is proposing that ALECs be able to assign only a finite

20   number of telephone numbers, up to six per customer. The ALEC will receive

21   confirmation on these assignments in no more than 2 business days. If, as

22   BellSouth suggests, this is at parity with itself, an ALEC customer will not be

23   able to use the number either for business cards or simple referrals until they

1   have this confirmation. However, it is unclear as to the method by which

2   BellSouth intends to confirm this number.

3

4   Should an ALEC be asked by a customer to assign a "Vanity Number," which is

5   a telephone number that spells a word or simple statement (i.e. 225-5624 spells

6   CALL-MCI), the number must spelled out by the ALEC to determine its

7   availability. If this specific number was not available per LENS, the ALEC

8   would need to repeat the process (i.e. go back to initial screen) with each new

9   combination that their customer might want to use to substitute for the original

10   number requested. Each new vanity number the customer wished to try would

11   need to be entered until either the customer runs out of ideas or the number is

12   available. While it may be true that a BellSouth Representative does not have

13   access to the entire list of "Vanity Numbers", BellSouth as a whole does know

14   all remaining "Vanity Numbers." The decision to restrict BellSouth personnel

15   *from access to these numbers is purely an internal business restriction of*

16   BellSouth. MCI as a whole is entitled to have similar information that is

17   available to BellSouth as a whole for it to make *its own business decisions as to*

18   the information available to its representatives.

19

20   As previously pointed out in my testimony, ALECs should have access to the

21   database and not be subjected to BellSouth's internal business decisions. An

22   ALEC should have the exact same access capabilities as the BOC, as a whole,

23   has. To this end, the DOJ has stated: "The Commission's nondiscrimination

1   rules require parity of access to specific OSS 'functions.'" The DOJ Evaluation

2   (page 78) recognized that providing such access "may require some

3   modifications to existing systems," and is nowhere limited by the role such

4   functions play with respect to the BOC's retail offerings.

5

6   In the case of an actual order, after the ALEC obtains the number from the

7   system, writes it in the order, and completes the sale, if the customer asks:

8   "What was that number again?" LENS provides no way to look at the order.

9   It is gone.

10

11   3. Feature Availability

12   Q.   HOW DOES LENS PROVIDE INFORMATION ON FEATURE

13   AVAILABILITY?

14   A.   BellSouth's LENS will permit an ALEC's service representative to access a set

15   of features associated with a specific telephone number. This, like most of the

16   LENS applications, is a one-feature at a time scenario. LENS presents a list of

17   features that are available from that office. "Tariffed" would be a more

18   appropriate label for this list, since unused but available features did not appear

19   to be present. Each of the features on the list that the ALEC required

20   information on would need to be accessed because nothing but the feature name

21   is provided. As such, to determine the pertinent billing and USOC information

22   the ALEC would need to access and manually record the information before

23   proceeding with the order. This must be done while the customer waits

1   patiently on the line to complete the order. Lastly, one would think that access

2   to this list of features would be driven either by the Telephone number or the

3   end office itself. This appears not to be the case as the screen requires the

4   ALEC to enter a valid telephone number before access is provided. If an ALEC

5   fails to enter a telephone number, the system will invoke the address validation

6   screen. A valid address would need to be entered that would provide a valid

7   telephone number which could be used to obtain the features

8

9   One interesting feature that appears on the list of features available from the

10   office is BellSouth Long Distance. Interestingly enough, BellSouth Long

11   Distance is on the scrambled list of long distance carriers with all of the other

12   carriers. However, this is the only long distance company listed as a feature that

13   can be selected by clicking on the feature table.

14

15   4. Select an Order Due Date

16   Q.   HOW DOES LENS HANDLE THE ASSIGNMENT OF DUE DATES?

17   A.   BellSouth' LENS also has the capability to permit ALECs to schedule an

18   "Appointment Date". One must assume that this is a reference to a customer

19   due dates that can be provided over the phone, even for the most basic

20   exchange services. With respect to the assignment of due dates, there is no

21   history, from the ALEC's perspective, that allows the ALEC to know what

22   BellSouth's intervals are, with respect to their customers, which would permit

23   the ALEC to assign due dates at "Parity" with BellSouth. Unless the ALEC

1   employed prior BellSouth personnel, how would they ever know that a feature

2   activation, if received by 3:00 p.m., would be installed the same day. If the

3   ALEC were to assign an appointment date based on the intervals they have

4   been receiving from BellSouth, they might very well assign a seven (7) day

5   interval to this customer request.

6

7   MCIs experience with test orders adding a single feature in Georgia was:

```
8                1-2    3-4    5-7   8-10  11-15  16+
9        Avg | Days  Days   Days  Days  Days  Days
10       -------------------------------------------
11       GA  7 |  0     19     16    10    15     3
12
```

13   In addition, *attempts to use the BellSouth LENS to view the appointment*

14   calendar for a new customer that just moved to an established sub-division in

15   the area failed. The system, in fact, knocked the user off and the MCI

16   representative making the attempt had to restart from the beginning and log on

17   to LENS. It appears that a telephone number is required before the customer

18   service representative can review the installation calendar for the office that

19   would serve this customer. The intervals that were provided for a similarly

20   situated customer, with a valid telephone number, were sparse to say the least

21   and there was no mention of the "in-by-three, out-by-five" policy.

22   Work Days Interval

23   Bus Res

```
24   Prem vis-reinst 1-2 lines    02   02      add 3 lines   04
25   reinstall 3 or more lines    02           add 4 lines   04
26   New install 1-2 lines        02   02      add 5 lines   04
```

1	Inside Wire/Dreg other	02	02	add 6-10 lines	07
2	Additional Line	02	02	add 11-15 lines	10

In addition, it appeared that this particular office was closed (dates were random and not sequential) for the next seven (7) days, "Closed all day Miscellaneous".

As discussed above, the LENS system locks up when a problem is presented (no telephone number). This flaw must be fixed before this system can be deemed operational. Customers expect and deserve to be informed of service start dates in real-time, especially new customers to the area that need to establish new phone service.

Ms. Calhoun, at page 30, line 22, of her pre-filed testimony, states that, although DSAP does not calculate a due date for a LENS due date inquiry that is not associated with an order, this is not discriminatory. However, a Change As Is order, which is only a name change and does not require any field work what so ever, routinely comes back with a 7 - 9 day interval because work is required. In a recent order placed in Georgia with the customer on the line an interval of thirteen days was provided through the Due Date Calculator. The customer could not wait that long because they did not currently have service and called BellSouth. The phone was installed that next evening. It is inconceivable that BellSouth does not recognize that this is a discriminatory practice.

1

2   5. Address Validation

3   **Q.   HOW DOES LENS PROVIDE FOR ADDRESS VALIDATION?**

4   A.   BellSouth's LENS will permit an ALEC's service representative to have access

5   to the various databases necessary for pre-ordering (e.g., the Regional Street

6   Address Guide). However, utilizing LENS, a web-type server, the ALEC

7   customer service representative would have to visually read information from

8   the BellSouth database, and manually input the information into the ALEC's

9   internal order entry system. Such web-based applications present severe

10   competitive limitations: They are time consuming for customers waiting on the

11   phone. To utilize, they require navigation through numerous screens or

12   windows in order to obtain responses to simple inquiries. Further, these

13   applications do not provide the data requested or necessary error messages

14   dynamically back to the user without some manual steps. By contrast,

15   BellSouth customer service representatives have one integrated platform

16   through which they take customers' orders. This disparity in access to

17   BellSouth's OSS will only become more pronounced as the volume of local

18   competition grows: ALECs could easily be overwhelmed by the manual steps

19   necessary to pre-order. These types of electronic interfaces that require the

20   ALEC to employ manual interfaces or uses for the data are, therefore,

21   unacceptable in a fully competitive marketplace.

22

1   In regards to the issues discussed in items 1-5 above, the DOJ tenders the

2   following: "Application-to-application interfaces allow a competitor to design

3   its own system based on standardized sets of inter-carrier transactions.

4   Leveraging these standard interfaces, a competitor may then present its

5   customers service representatives with its own set of customized screens and

6   information, and automatically populate its own databases with information at

7   the same time it interacts with a BOC's systems." DOJ Evaluation, page 76.

8

9 Q. **IS LENS AN ADEQUATE SYSTEM FOR PERFORMING PRE-**

10   **ORDERING FUNCTIONS?**

11 A. No. Neither the LENS "Users Guide", the Retail Ordering Guide ("ROG") or

12   the Facilities Ordering Guide ("FOG") address (1) how ALECs will be able to

13   access potential customers' directory listing information during the pre-ordering

14   process, or (2) how ALECs will be able to determine customer information

15   concerning customers of other ALECs. In fact, during the MCI trial, BellSouth

16   was unable to determine what ALEC our customers were being served by. It

17   was MCI's understanding that a BellSouth customer that migrated to MCI

18   would have their customer service record changed to reflect that MCI was the

19   customer of record for that telephone number. BellSouth will need to address

20   these critical areas of information in order to fully implement local competition

21   in Florida.

22

1   In summary, it is clear, even from the limited access that MCI has been afforded

2   to this system, that LENS is in no way ready for operation even from a trial

3   mode. This rudimentary OSS system that BellSouth has in place for pre-

4   ordering will serve as a significant anti-competitive hurdle. New customers

5   attempting to do business with ALECs will immediately notice the inability of

6   ALECs readily to access information that BellSouth customer service

7   representatives have at their fingertips. In fact, ALECs attempting to use

8   BellSouth's primitive pre-ordering systems could suffer long-term damage, as

9   consumers may come to associate ALECs will cumbersome service and

10   therefore hesitate to purchase from ALECs even after BellSouth has

11   implemented more suitable standards-driven pre-ordering solutions.

12

13   Q.   **ARE THERE ANY DEFICIENCIES IN BELLSOUTH'S ORDERING**

14   **CAPABILITIES?**

15   A.   Yes. BellSouth's ordering procedures require far too many manual

16   interventions on the ALECs part to complete the multiplicity of transactions

17   required to convert each customer that has been won away from BellSouth. In

18   its evaluation, the DOJ was also critical of wholesale support processes that

19   force ALECs to engage in multiple transactions. It is worth quoting DOJ

20   Evaluation again:

21   Because each BOC has *millions* of access lines, meaningful

22   compliance with the requirement that the BOC make

23   available resale services and access to unbundled elements

1   demands that the BOC put in place efficient processes, both

2   electronic and human, by which an ALEC can obtain and

3   maintain these items in competitively-significant numbers.

4   The checklist requirements of providing resale services and

5   access to unbundled elements would be hollow indeed if the

6   efficiency of -- or deficiencies in -- these 'wholesale support

7   processes,' rather than the dictates of the marketplace,

8   determined the number or quality of such items available to

9   competing carriers." Simply put, wholesale support

10   processes must provide a sound basis for active

11   competition. (Page 26)

12

13   Q.   ARE BELLSOUTH'S ORDERING SYSTEMS CAPABLE OF

14   HANDLING ORDERS FOR UNBUNDLED NETWORK ELEMENTS?

15   A.   No. BellSouth readily admits that their ordering systems are not and will not be

16   ready for UNEs and that BellSouth "[w]ill require manual effort which they will

17   be beefing up." This requires the ALEC to fill out and then fax four (4)

18   separate order forms to complete the order for an Unbundled Network

19   Element. UNEs are critical to all ALECs, but in particular to providers such as

20   MCIm who have their own switch. UNEs are a basic building block enabling a

21   switch based provider, such as MCIm, to expand the geographic scope of its

22   offerings while being able to use its innovation and creativity to develop new

23   switched based services. This is clearly a result for the people of Florida that

1   this Commission intended to be achieved through local competition.

2

3   Q.   **ARE BELLSOUTH'S SYSTEMS ADEQUATE TO HANDLE ORDERS**

4   **FOR RESALE OF BUSINESS SERVICES?**

5   A.   No. As in the case of UNEs, BellSouth has no mechanism in place, other than

6   manual, for resale of business products such as CENTREX, CSAs or even, for

7   that matter, an order for more than six lines. As such it is worth repeating the

8   DOJ remarks on this subject: "Application-to-application interfaces allow a

9   competitor to design its own system based on standardized sets of inter-carrier

10   transactions. Leveraging these standard interfaces, a competitor may then

11   present its customers service representatives with its own set of customized

12   screens and information, and automatically populate its own databases with

13   information at the same time it interacts with a BOC's systems." Evaluation,

14   page 76.

15

16   Ms. Calhoun goes to great lengths to describe the manual processes associated

17   with complex orders. The problem is she apparently does not know the

18   difference between sales activities and ordering activities. Ms. Calhoun expects

19   an ALEC to invite BellSouth to work with its prospective customer to

20   understand what the customer needs, then for BellSouth to design the service

21   for the customer, and finally for the ALEC to hand the order off to a BellSouth

22   service representative to type the order into the system. Ms. Calhoun

23   references Smarrtring as an example of a service where this procedure would be

1   required. Well, if MCI was capable of redesigning the entire Federal Aviation

2   Agency network and getting it installed without an ILEC's help, I think we can

3   handle Smartring. What we can not do is place the resale order with BellSouth,

4   because the systems in service are limited to ordering only the most basic of

5   telecommunications services. This is not what this Commission ordered nor is

6   it what the Act requires.

7

8 **Q.**   **ARE THE BELLSOUTH OSS ADEQUATE FOR SIMPLE RESALE**

9   **ORDERS?**

10 **A.**   No. BellSouth's resale ordering provisions are unsatisfactory in several

11   respects. Especially troubling is BellSouth's use of the "features available"

12   function of LENS to offer BellSouth Long Distance as a service associated with

13   resale. In addition the system requires the user to work each feature as a

14   separate order or function. This means, rather than selecting multiple features

15   required, the ALEC must select each feature, one at a time, always being forced

16   back to the beginning. In addition, system hic-ups, where the ALEC is locked

17   out of the system when an input or system error occurs, happen far to

18   frequently. This is comparable to writing a document on your PC and, not

19   having saved the information along the way, losing power or connection forcing

20   you to start from the beginning. This is a situation that simply can not be

21   permitted.

22

1   Second, neither LENS nor the BellSouth's Resale Ordering Guide provide

2   information on how ALECs can order some of the more complex service

3   offerings -- such as Centrex Services, PBX trunks and ISDN services. This

4   information is critical for ALECs to be able to offer these services to their

5   business and (for ISDN) their residential customers. ALECs must be provided

6   with OSS that support the ordering of offerings that are at parity with the

7   systems that BellSouth uses. Case-by-case negotiations between ALEC and

8   BellSouth representatives, who are competitors of the ALEC, over common

9   elements or services are no substitute for standardized, tested OSS interfaces

10   and procedures. BellSouth's OSS system must accommodate the physical

11   placement of an order for complex services. At some time, even in the life cycle

12   of a BellSouth complex order, a BellSouth person must place the order into

13   their system to create the service order. ALECs, such as MCI, must be

14   afforded the same interface capability through the OSS system. Again, a

15   BellSouth business practice of not allowing BellSouth Business Office

16   representatives to enter complex orders should not dictate what is made

17   available to an ALEC. The idea of proposing that a BellSouth person must be

18   manually in the loop for the potential loss of a business customer borders on the

19   absurd.

20

21   Third, BellSouth has announced that it intends to follow resale ordering

22   procedures that will make it very difficult for its competitors to order accurately

23   the specific features a customer desires. BellSouth will not permit ALECs to

1   submit orders to switch a customer "as specified." This restriction means that

2   ALECs must obtain the CSRs of their *new customers before ordering and then,*

3   if the customer wants different services than it had with BellSouth, the ALEC

4   would have to inform BellSouth which features should be added and which

5   should be deleted. With switching "as specified" electronically, by contrast, an

6   ALEC would only have to list the new service to create the change order and

7   would not need to obtain the CSR to determine which features to add and drop.

8   The inability to switch customers "as specified" will make it extremely difficult

9   for ALECs to order service in a timely manner.

10

11   Switch "as is" is comparable to today's "PIC of all" in the *interexchange world.*

12   "PIC-of-all" is not limited to single line residential or business customers as they

13   seem to be for ALECs. In fact, the "PIC-of-all" was intended for large complex

14   customers. If a local business subscriber wanted to switch their entire service

15   to an ALEC, this represents to BellSouth *nothing more than a name change*

16   *within their CRIS billing system and* should be accomplished on the same day

17   that the order was issued. Anything less should be totally unacceptable. This

18   feature must be added to the BellSouth OSS ordering system before they are

19   deemed commercially available.

20

21   Q.   **HOW DOES THE LENS SYSTEM HANDLE ORDER REJECTS?**

22   A.   The LENS system supposedly transmits rejects back to the ALEC for

23   correction and their ultimate resubmitting of the order. In fact, what appears to

1		happen, is the subsystem LEO or LESOG sends the reject to the LCSC. The
2		LCSC then researches the order to determine what is wrong and then inputs
3		this back into LENS for the ALEC to see. This is definitely not what happens
4		through the ILEC's own systems, where the ILEC's representative cannot
5		continue with an order in error until the error is corrected. This has and will
6		greatly increase the time required by an ALEC to place an order into the
7		system.
8		
9	Q.	ARE THERE ANY OTHER SHORTCOMINGS IN BELLSOUTH'S
10		ORDERING SYSTEMS?
11	A.	Yes. The FOG states that two options are available for ordering unbundled
12		network elements, either via facsimile or, for access related elements, via the
13		Exchange Access Control and Tracking System ("EXACT") electronic
14		interface. Neither of these options is competitively viable over the long run.
15		Both procedures ultimately require that BellSouth employees manually enter
16		ALECs' orders into the BellSouth ordering system. Both procedures
17		accordingly do not provide parity of service with that available to BellSouth
18		from itself, and they both will inevitably lead to significant errors and delay.
19		While these ordering options will have to suffice for the time being, they should
20		not be accepted by the Commission as adequate justification for BellSouth's
21		entry into long distance.
22		

1 BellSouth is offering MCI the ability to use an EDI, batch-type interface for

2 ordering during this interim period. This interface is not acceptable, however,

3 because it is not keeping pace with the work being done at the OBF. More

4 importantly, BellSouth is designing the LENS system as the sole interface for

5 customer records. The combination of LENS pre-ordering and EDI ordering

6 from a large ALEC, such as MCI, that has their own OSS systems is a slap in

7 the face with respect to parity. The OBF is already examining the ability of the

8 EDI to provide access to customer service records. This addition by BellSouth,

9 remembering that EDI is a batch process, is at least more desirable from a single

10 system perspective, but still lacks the ability to provide true "Parity" between

11 the ALEC and BellSouth with respect to order pre-order and order processing.

12

13 Despite the fact that BellSouth has agreed in the MCI/BellSouth

14 Interconnection Agreement to provide specific due dates for services and to

15 provide service within certain time intervals, BellSouth does not commit itself

16 to the due dates generated by LENS. In addition, the due dates generated are

17 often substantially longer than the agreed-upon time intervals. It remains to be

18 seen whether EDI does a better job handling due dates.

19

20 Moreover, BellSouth has not provided for electronic ordering of interim local

21 numbering portability ("ILNP"). The FOG states that paper forms are to be

22 used to order ILNP. Facilities-based competitors will have great difficulty in

23 establishing a customer base if basic functions such as ILNP are relegated to

1   manual intervention.

2

3   BellSouth's OSS is competitively unsatisfactory for the additional reason that it

4   provides for limited "flow through" from ordering to provisioning. Once an

5   ALEC has submitted an order and BellSouth has verified the accuracy of the

6   order, BellSouth's OSS requires additional manual intervention prior to the

7   order going into the BellSouth provisioning queue as the interval or

8   appointment as well as telephone number assigned must still be verified. This

9   additional step will likely create a bottleneck resulting in significant backlogs for

10   resale orders as volumes increase with emerging competition in the local

11   market.

12

13   Q.   **IS IT YOUR OPINION THAT BELLSOUTH'S PROVISIONING**

14   **INTERFACES ARE SUFFICIENT TO SUPPORT LOCAL**

15   **COMPETITION?**

16   A.   *No. There are four provisioning sub-functions, i.e., four types of reports the*

17   *provisioning ILEC must communicate to the requesting ALEC:* Firm order

18   confirmation ("FOC"); change in order status; error notification; and, order

19   completion. BellSouth's announced procedures do not perform these functions

20   adequately.

21

22   Specifically, BellSouth states repeatedly that an FOC is not a guarantee that the

23   service will be provided on the date communicated to the ALEC. In addition,

1   many of the preordering functions (e.g. telephone number assignment and

2   appointment) must be confirmed at a later date through either the EXACT

3   system, an EDI interface, or facsimile or via telephone. In addition, BellSouth

4   plans to notify ALECs via telephone if a committed service date cannot be met.

5   As discussed above, these types of interfaces will require human intervention

6   for processing and will increase costs for both BellSouth and for ALECs. This

7   process is further complicated when the order is complex. The actual definition

8   of "complex" is not clearly articulated anywhere by BellSouth. However, any

9   ALEC activity that entails greater than six lines or trunks (i.e. the magical point

10   between a normal and a complex order) must have the dates negotiated. It is

11   unclear what the ALEC is negotiating if BellSouth does not feel obligated to

12   meet the dates provided. Moreover, it is unclear how electronic ordering could

13   be effective where orders greater than six lines or trunks will require manual

14   intervention

15

16 Q.   **HAS BELLSOUTH DEMONSTRATED THAT IT IS CAPABLE OF**

17   **PROVIDING SUFFICIENT MAINTENANCE AND REPAIR SERVICES**

18   **TO ALECS?**

19 A.   No. BellSouth has provided scant information on the details of how to process

20   a trouble report, how to escalate, expected service levels, or performance

21   metrics. Without this information, it will be impossible for ALECs to measure

22   BellSouth's responsiveness to repair requests. The Trouble Analysis

23   Facilitation Interface (TAFI) is another of BellSouth proprietary system

1   offerings that would require ALECs such as MCI to have multiple log-ons --.

2   both to the MCI trouble management system and to the BellSouth TAFI

3   system.

4

5 Q.   HOW DOES BELLSOUTH PROPOSE TO HANDLE TROUBLE

6   REPORTS FOR INTERCONNECTION AND UNBUNDLED

7   ELEMENTS?

8 A.   With respect to Interconnection and Access to Unbundled Elements, BellSouth

9   has offered to accept either verbal or electronic batched trouble reports.

10   Clearly, verbal procedures and the delays and errors they entail are an

11   unacceptable basis for local competition. Trouble reports submitted in

12   electronic batches are also problematic, in that further manual interventions are

13   necessary once the reports reach BellSouth. With respect to TAFI, it is a

14   BellSouth proprietary system that does not conform to the national standards

15   organizations specifications.

16

17   I also have continuing concerns that the Local Customer Service Center

18   ("LCSC") established by BellSouth to handle installation orders and

19   maintenance requests from ALECs will be capable of providing sufficient

20   support. MCI's experience with this very center has been less than satisfactory.

21   In fact, the level of service deteriorated to a point where the Director of the

22   BellSouth LCSC wrote to MCI. In response to the up to 45 minute hold times

23   that our service representatives were experiencing, the following was offered:

1   Our telephone reports do not indicate any excessive delays

2   in queue, but during the time frame that you indicate we had

3   just installed our new phone system and there is a possibility

4   that a problem may have existed.

5

6   Training, or lack thereof, of the BellSouth LCSC representatives leaves much

7   to be desired. In fact, MCI was told by the LCSC that MCI was not authorized

8   to order unbundled loops for a customer. This statement was made after this

9   Commission had approved our Interconnection Agreement with BellSouth.

10

11   Q.   **HOW DOES BELLSOUTH PROPOSE TO HANDLE REPAIR**

12   **SERVICE FOR RESALE CUSTOMERS?**

13   A.   For resale competitors, BellSouth is not even offering the small comfort of the

14   LCSC to handle repair issues or, as previously noted, complex orders.

15   Resellers apparently will have to call into a number of varying BellSouth

16   locations to obtain answers to common day-to-day business questions and to

17   handle repair requests. These are the same service centers that BellSouth has

18   established for retail customers. In all likelihood, the ALEC will be required to

19   engage in awkward, three-way telephone calls with their customers and the

20   BellSouth service center. With respect to the assigned account teams, if MCIs

21   experience holds true for other ALECs, very few of the account personnel

22   assigned will have any experience with the local markets. Although BellSouth

23   also offers ALECs the option of sending batched electronic trouble reports,

1   such batched messages (as discussed above) will likely introduce significant

2   delay and mistake into the repair process. Until EB is introduced, resale

3   competitors will find it impossible to obtain maintenance and repair for their

4   customers which is the equivalent of what BellSouth provides to itself.

5

6 Q.   ARE THE BILLING INTERFACES PRESENTLY OFFERED BY

7   BELLSOUTH ADEQUATE FOR LOCAL COMPETITION?

8 A.   No. As with the other OSS functions, BellSouth's current billing systems

9   cannot support local competition. While BellSouth has committed to use the

10   industry-standard Carrier Access Billing System ("CABS") bills, the Customer

11   Records Information System ("CRIS") billing system will be used for at least

12   the first 180 days. CRIS bills are almost impossible to audit, they use

13   idiosyncratic protocols, and they do not provide sufficiently specific information

14   to determine whether what has been ordered is being billed. Although CRIS

15   bills may be acceptable in the short term as a stop-gap measure, their use is

16   unacceptable as a basis for long-term, full-scale competition. The commission

17   should obtain the actual date that BellSouth intends to begin billing using CABS

18   for all of the ALECs activities.

19

20 Q.   DOES BELLSOUTH PROVIDE A RESELLER WITH ALL THE

21   USAGE INFORMATION NECESSARY FOR THE ALEC TO

22   RECOMMEND THE MOST COST EFFECTIVE PACKAGE OF

23   SERVICES TO ITS CUSTOMERS?

1   A.   No. The daily usage feeds being provided by BellSouth to ALECs, such as

2   MCI, do not contain customer usage data on all calls made by their customers.

3   Information critical to the enable the ALEC to advise customers on the proper

4   products they should be using is being denied. The information needed relates

5   to local calls made from non-measured resold lines. The reason given by

6   BellSouth for its failure to provide such data is that it does not extract this

7   information for itself. As in the case of vanity numbers, BellSouth again is

8   seeking to impose its internal business practices on the ALEC community.

9   BellSouth has access to this data and hence an ALEC should have this data

10   provided to it. How else will an ALEC be able to determine if a customer

11   should or should not be on a measured or flat business or residential line?

12

13 Q.   **PLEASE SUMMARIZE YOUR ANALYSIS OF BELLSOUTH'S**

14   **CURRENT OSS CAPABILITIES.**

15 A.   The systems BellSouth presently has in place to interface with ALECs do not

16   provide a reliable basis for full scale competition in Florida. I have serious

17   reservations about BellSouth's OSS capabilities in each of the five OSS

18   subfunctions. BellSouth's interim OSS solutions are still far too cumbersome to

19   allow ALECs to even approach the levels of customer service provided by

20   BellSouth. Only EB interfaces will truly permit ALECs to offer service at

21   parity with that of BellSouth. Although BellSouth has committed to

22   implementing EB in the future, the Commission should wait until EB is in place

23   and functioning before determining whether BellSouth's EB processes provide a

1   sufficient basis to support local competition.

2

3   Q.   **YOU HAVE BEEN DISCUSSING HOW INEFFECTIVE ORDERING**

4   **SYSTEMS CAN HARM THE PROSPECTS FOR LOCAL**

5   **COMPETITION, COULD YOU RECOUNT SOME FLORIDA**

6   **SPECIFIC EXAMPLES OF ACTUAL PROBLEMS MCI HAS**

7   **ENCOUNTERED IN ITS ATTEMPTS TO ORDER SERVICE FOR**

8   **CUSTOMERS FROM BELLSOUTH?**

9   A.   Yes. MCI has been ordering residential resale service for some of its employees

10   in Florida on a test basis. Despite the simple nature of resale orders and

11   BellSouth's claims that it has the necessary systems in place, it has taken

12   BellSouth an average of 6 days to process each order. While I believe that it is

13   appropriate to look at problems throughout BellSouth's service area since

14   BellSouth uses the same ordering and provisioning systems in other states,

15   below is a sample of the problems MCI has encountered in Florida:

16   1. In separate incidents in March and May, 1997, MCI had new customers lose

17   dialtone when they tried to switch to MCI. According to BellSouth representatives,

18   BellSouth processes orders in two steps: One to disconnect the customer from

19   BellSouth and one to connect to MCI local. In both cases, the first order

20   disconnecting the customer was processed but the second order connecting the

21   customer to MCI was not and the customer was left without dialtone for 24 hours.

22   In one case, the customer's family experienced a medical emergency during the

23   outage. A third MCI customer similarly lost dialtone when switched in March,

1   1997; however, BellSouth representatives never confirmed the reason for the

2   problem. It is worth noting that BellSouth utilized this procedure despite the fact

3   that the Interconnection Agreement between MCI and BellSouth, which was

4   pending at the time of these incidents, specifically disallows BellSouth from

5   unnecessarily disconnecting an MCI customer during the migration. See Para. 2.2.2

6   of Attachment VIII of the Agreement. The specific customers have had their loss of

7   dialtone restored; however, the underlying problem apparently still exists. In

8   March, 1997, MCI reported the problem to the manager of the Local Carrier

9   Service Center. BellSouth stated that they would research the matter and report

10   back to MCI. In May, 1997, the problem occurred again. According to a

11   BellSouth representative, the customer representative working an order is

12   responsible for ensuring that the separate orders go through, which did not happen

13   in these cases. Unless BellSouth simplifies its process and makes it more user

14   friendly, perhaps by using only one order to accomplish the switch, the problem will

15   likely recur. This problem will be exacerbated when the volume of switches

16   increases beyond merely test orders.

17
18   2. A myriad of problems with the way BellSouth processes resale orders can cause

19   significant delays in switching customers. Although BellSouth gives "completion"

20   dates, it has failed to process orders by that date. This is sometimes difficult to

21   detect, however, since BellSouth does not send MCI a verification of what action it

22   takes on orders. Before the work is done, BellSouth sends back a due date; but it

23   does not send a confirmation when the work is actually done and it does not

1 confirm what features/services have been added. Instead, they require MCI to

2 request a new CSR after the migration. The combination of these problems has

3 resulted in cases where customers were still not switched well past their due dates

4 and BellSouth failed to inform MCI that the date had not been met. It is worth

5 noting that the Interconnection Agreement between MCI and BellSouth specifically

6 requires BellSouth to send an order completion notification to MCI and to provide

7 to MCI the date the service is initiated. See Para. 2.2.13 and Para. 2.2.6.3 of

8 Attachment VIII of the Agreement.

9

10 In one case, MCI faxed an order to BellSouth on February 19, 1997, for the resale

11 of two numbers. No response to the order was received, so a status request was

12 faxed to BellSouth on March 19, 1997. BellSouth then requested that the original

13 order be refaxed. On March 20, 1997, BellSouth sent a rejection stating that one of

14 the telephone numbers was incorrect. On the same day, MCI sent a corrected

15 version. On March 21, 1997, MCI called BellSouth to make sure that they had

16 received the order. On March 24, 1997, MCI received a confirmation with a

17 completion date of March 25, 1997. On April 4, 1997, the customer received a bill

18 from BellSouth for the next month. MCI contacted a BellSouth representative who

19 researched the matter and reported that the order had errored out; however, no one

20 had bothered to report this to MCI. MCI had to send a new order on April 7, 1997.

21 BellSouth gave the new order a due date of April 8, 1997. On April 14, 1997, the

22 customer complained that one of the numbers still had not been switched. MCI

23 contacted BellSouth which gave a new completion date of April 16, 1997.

1

2   In another case, MCI sent a resale order for two telephone numbers for a customer.

3   MCI received confirmation by BellSouth on March 3, 1997, with a completion date

4   of March 3, 1997. The customer received a BellSouth bill for both numbers at the

5   beginning of May, 1997. On May 5, 1997, MCI called a BellSouth representative

6   who reported that neither number had ever been switched to MCI. One number

7   was still with BellSouth and the other number was switched to a third carrier in

8   error. MCI faxed a new order and received a confirmation for both lines with a

9   completion date of May 9, 1997.

10
11   BellSouth eventually resolved these individual incidents on a case-by-case basis;

12   however, MCI continues to experience delays in processing its orders. Such

13   incidents, if allowed to continue, will have a disastrous effect on MCI's ability to

14   compete. End users will not know the cause of such mix-ups and problems, and

15   could likely perceive it as the ALEC's incompetence. An ALEC's ability to

16   maintain customer confidence cannot be allowed to be controlled by the ILEC.

17

18   3. BellSouth continues to fail to timely respond to customer service requests from

19   MCI. In March, 1997, MCI representatives experienced problems such as being left

20   on hold for 45 minutes when trying to contact BellSouth through its LCSC, which

21   is MCI's designated point of contact. See Para. 2.3.1.5 of Attachment VIII of the

22   Interconnection Agreement between MCI and BellSouth. Such unresponsiveness

23   from BellSouth, if allowed to continue, will have a disastrous effect on MCI's ability

1   to compete. End users will not know the cause of delays and probably would not

2   care who is at fault, they will only perceive that switching from an ILEC to an

3   ALEC is more trouble for them than staying with the incumbent. After incidents in

4   March 1997, BellSouth had stated that they would timely respond to MCI's

5   inquiries; however, MCI continues to experience long callhold times, unreturned

6   telephone calls, and unresponsiveness.

7
8   For example, on May 23, 1997, MCI received two BST Information/Clarification

9   faxes regarding two "Migrate As Is" trunk orders. An MCI representative called

10 the BellSouth employee who had sent the faxes to seek clarification. He made two

11 attempts to call and got voice mail both times. He left a message at 11:00a.m. At

12 2:50, he had not heard anything so he called and left another message with the same

13 BellSouth representative. At 2:57, he called the LCSC. His call was answered by a

14 second BellSouth employee. The MCI representative explained the situation and

15 was placed on hold for two minutes. The second BellSouth representative came

16 back on to let him know that the first BellSouth representative was not available.

17 She placed the MCI representative on hold for an additional two minutes. She then

18 told him that the first BellSouth representative was not at her desk and offered to

19 take a message. At 3:39 p.m., the MCI representative called a third BellSouth

20 representative, who had called MCI for clarification on the orders. The third

21 BellSouth employee then told the MCI representative that he was not the one who

22 handled the orders and he placed the MCI representative on hold. He said that a

23 fourth BellSouth representative was handling the order and needed to know what

1   we needed done on the order. The MCI representative stated that we were trying

2   to Migrate or Convert As Is the trunks. That was apparently all the clarification

3   that was needed, which is odd because the OBF clearly stated order type.

4

5   On May 29, 1997, the MCI representative called the LCSC at its 800 number.

6   After 20 rings it was answered by a fifth BellSouth representative. She stated she

7   does not handle trunk orders and put the MCI representative on hold for 4 minutes.

8   She returned to say that both people who handle trunk orders were online. She

9   tried to pull the order information up herself but could not. She said she would

10   have to take a message and have someone call back.

11

12   On May 30, 1997, the MCI representative again called the 800 number. The fourth

13   BellSouth representative answered and transferred the MCI representative to a sixth

14   BellSouth representative who then transferred him to a seventh BellSouth

15   representative. The seventh representative said that she could not locate the order

16   anywhere and placed the MCI representative on hold for 2 minutes. She found an

17   eighth BellSouth representative who then transferred him back to the fourth

18   BellSouth employee. The fourth representative then checked and said that a ninth

19   BellSouth representative had checked out the order but was not there. The fourth

20   representative went to check the ninth representative's desk but could not find the

21   order. He told the MCI representative to call the ninth representative back later.

22

1   The problem of callhold times, unreturned telephone calls, unresponsiveness, and

2   the delays they create appears to be on going. It is not clear why BellSouth has

3   been unable to resolve these problems.

4

5   4. The Commission has ordered that BellSouth use LCSC as MCI's single point of

6   contact for handling orders. See Para. 2.3.1.5 of Attachment VIII of the

7   Agreement. In addition, the Agreement requires BellSouth to use the same process

8   for handling both business and residential orders. See Para. 2.3.1.2 of Attachment

9   VIII of the Agreement. Despite this, BellSouth's LCSC has refused to handle a

10   complex order from MCI insisting that MCI send it to the BBS.

11

12   In the incident in question, MCI submitted the order to the LCSC on April 1, 1997.

13   On April 2, 1997, a MCI representative called the LCSC to confirm that the order

14   was received. BellSouth stated that the fax had not been received. MCI refaxed the

15   order. No response was received from BellSouth, so on April 17, 1997, the MCI

16   representative called BellSouth for the status. The BellSouth representative at the

17   LCSC stated that the order was assigned to a BBS representative. The MCI

18   representative was transferred to the BBS and was placed on hold for 15 minutes.

19   The BBS representative said she could not find the order and that she knew nothing

20   about it or the service center who had transferred the MCI representative to her.

21   She told us to refax the order. The order was refaxed, but when she got it, she said

22   her service center should not process it because it was a business order. She said

23   that her name was given by the LCSC in error, that she had never seen the order.

1

2   On April 18, 1997, the MCI representative called BellSouth's to ask how and with

3   whom the order should be processed. The service center said BBS was wrong, and

4   that the order has to be processed by the BBS center. The BellSouth representative

5   stated that the problem would be investigated and we should expect a call back. No

6   call was received. On April 21, 1997, the MCI representative called for status and

7   was told that this order was sent to the BBS center. The MCI representative asked

8   for BBS's phone number so MCI discuss the order with them. The BellSouth

9   representative did not know the number but promised to find it and give it to MCI.

10   On April 21, 1997, the MCI representative received a call from another BellSouth

11   representative who stated that the order could not be processed by the Resale

12   Service Center and that BellSouth's MCI account team would have to be notified

13   and the account team would have to submit the order to the BBS Service Center

14   because it is a complex order.

15

16   I believe these example are a good illustration of the difference between saying

17   you can do something and actually being able to do it. Paper promises are just

18   that. More importantly, in the examples provided above - customers are the

19   losers. The Commission should not find that to be acceptable and should not

20   reward BellSouth for the current state of affairs.

21

22   **CONCLUSION**

23   **Q.**   **PLEASE PROVIDE A RECOMMENDATION TO THE COMMISSION**

1   **REGARDING THE SUITABILITY OF BELLSOUTH'S OSS SYSTEMS**

2   **TO SUPPORT LOCAL COMPETITION ON A COMMERCIAL**

3   **SCALE.**

4 A.   The systems BellSouth presently has in place to interface with ALECs do not

5   provide a reliable basis for full scale competition in Florida. BellSouth's interim

6   OSS solutions are still far too cumbersome to allow ALECs to even approach

7   the levels of customer service provided by BellSouth. Only Electronic Bonding

8   interfaces will truly permit ALECs to offer service at parity with that of

9   BellSouth. Although BellSouth has committed to implementing EB in the

10   future, the Commission should wait until EB is in place and functioning before

11   determining whether BellSouth's EB processes provide a sufficient basis to

12   support local competition.

13

14 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

15 A. Yes.

16

17

18

19

20

21

22

23