

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

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 :  
 In the Matter of :  
 :  
 :  
 In re: Consideration of : DOCKET NO. 960786-TL  
 BellSouth Telecommunications, :  
 Inc.'s entry into interLATA :  
 services pursuant to Section :  
 271 of the Federal :  
 Telecommunications Act of 1996.:  
 -----

THIRD DAY - EVENING SESSION  
 VOLUME 14  
 Pages 1476 through 1596

BEFORE: CHAIRMAN JULIA A. JOHNSON  
 COMMISSIONER J. TERRY DEASON  
 COMMISSIONER SUSAN F. CLARK  
 COMMISSIONER DIANE K. KIESLING  
 COMMISSIONER JOE GARCIA

PROCEEDING: HEARING

DATE: Thursday, September 4, 1997

TIME: Commenced at 5:30 p.m.

PLACE: 4075 Esplanade Way, Room 148  
 Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR  
 Notary Public in and for  
 the State of Florida at Large

APPEARANCES: (As heretofore noted.)

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## P R O C E E D I N G S

1  
2 (Transcript continues in sequence from  
3 Volume 13.)

4 CHAIRMAN JOHNSON: Any other preliminary matters?

5 MR. SELF: Chairman Johnson, excuse me. The  
6 first day, whatever that was, we discussed the fact that  
7 WorldCom's's witness, Mr. Ball, about fixing a time certain  
8 for him, I was wondering based upon what has happened so far  
9 if maybe we could just at least identify him for Wednesday  
10 of next week and --

11 CHAIRMAN JOHNSON: He was available --

12 MR. SELF: -- so we can get him on a plane.

13 MS. WHITE: That brings up a question I had. I  
14 have gotten very confused, which is easily done, on which  
15 witness is coming when. I mean, I think we have got a lot  
16 of special sets. If maybe before we leave tonight we could  
17 kind of go through the order and when that is going to be,  
18 that would be very helpful.

19 CHAIRMAN JOHNSON: Why don't we do that at the  
20 end of the proceeding.

21 MR. SELF: That's fine.

22 CHAIRMAN JOHNSON: We did have a couple of folks  
23 that we said we would try to accommodate once we had a  
24 better feel for how long this would take, so we will we do  
25 that at the end of the evening.

1 MS. WHITE: Thanks.

2 MS. RULE: Commissioners, while we're on  
3 miscellaneous matters, I had some extra copies made of  
4 exhibit number -- and, of course, I didn't have it numbered  
5 at the time. I believe it's 49. 50? The August 21st, 1997  
6 letter, and I understand there weren't enough copies to go  
7 around before, so I will pass them down and whoever wants  
8 them can have them.

9 CHAIRMAN JOHNSON: If everyone could settle in,  
10 we'll go ahead and start with Mr. Stacy.

11 MR. RANKIN: My name is Ed Rankin, I will be  
12 conducting the direct examination of Mr. Stacy. I believe  
13 he has been sworn.

14 MR. STACY: Yes, I have.  
15 Thereupon,

16 WILLIAM N. STACY  
17 was called as a witness by BellSouth Telecommunications,  
18 Inc, and having first been duly sworn, was examined and  
19 testified as follows:

20 DIRECT EXAMINATION

21 BY MR. RANKIN:

22 Q Would you please state your name and business  
23 address for the record?

24 A My name is William N. Stacy, my business address  
25 is 675 West Peachtree Street, Atlanta, Georgia.

1 Q And by whom are you employed and in what  
2 capacity?

3 A I am employed by BellSouth Telecommunications as  
4 the Assistant Vice President of Services in the  
5 Interconnection Operations Organization.

6 Q Did you cause to be prepared in this proceeding  
7 prefiled direct testimony totalling 31 pages?

8 A Yes, I did.

9 Q Do you have any additions, deletions, or  
10 corrections to that testimony?

11 A I do not to that testimony.

12 Q If I asked you the same questions today would  
13 your answers be the same?

14 A Yes, they would.

15 MR. RANKIN: Madam Chairman, I would ask that the  
16 prefiled direct testimony of Mr. Stacy be inserted into the  
17 record as if given orally from the stand.

18 THE COURT: It will be so inserted.

19

20

21

22

23

24

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1                   **BELLSOUTH TELECOMMUNICATIONS, INC.**  
2                   **DIRECT TESTIMONY OF WILLIAM N. STACY**  
3                   **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**  
4                   **DOCKET 960786-TL**  
5                   **JULY 7, 1997**

6  
7 Q.    Please state your name, address and position with BellSouth  
8        Telecommunications, Inc. (BellSouth).

9  
10 A.   My name is William N. Stacy. My business address is 675 West  
11       Peachtree Street, Room 4410, Atlanta, GA 30375. I am the Assistant  
12       Vice President - Services for the Interconnection Operations  
13       Department of BellSouth Telecommunications Inc. ("BellSouth"). In  
14       this position I am responsible for development of the procedures used  
15       by BellSouth personnel to process Alternative Local Exchange  
16       Company (ALEC) service requests, and for assisting the service  
17       centers in Interconnection Operations in implementing ALEC contracts  
18       in a manner consistent with State Commission and Federal  
19       Communication Commission (FCC) rules and regulations governing  
20       local exchange competition.

21  
22 Q.    Please summarize your background and experience.

23  
24 A.    I received a Bachelor of Science degree in electrical engineering in  
25       1970 from the University of Kentucky, in Lexington, KY. I have 27

1 years of experience with BellSouth, including 5 years with BellSouth  
2 Enterprises at MobileComm, a paging company previously owned by  
3 BellSouth. I have held numerous positions in BellSouth in Network  
4 Engineering, Operator Services, Network Planning, and Network  
5 Operations. I am a registered professional engineer in the states of  
6 Alabama, Kentucky and Mississippi.

7

8 Q. What is the purpose of your testimony?

9

10 A. The purpose of my testimony is to discuss BellSouth's proposed and  
11 negotiated performance measures and methods for comparing data  
12 from those measures. My discussion will address two of the issues  
13 identified in this docket. The first is Issue 3 which has been stated in  
14 the following question:

15

16 "Has BellSouth provided nondiscriminatory access to network  
17 elements in accordance with the requirements of sections  
18 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996,  
19 pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by  
20 the FCC?

21

22 (a) Has BellSouth developed performance standards and  
23 measurements? If so, are they being met?"

24

25

1 The second issue is Issue 15(a) which has been stated in the following  
2 question:

3  
4 "Has BellSouth provided telecommunications services available  
5 for resale in accordance with the requirements of section  
6 252(d)(2) of the Telecommunications Act of 1996, pursuant to  
7 section 271(c)(2)(B)(xii) and applicable rules promulgated by the  
8 FCC?

9  
10 (a) Has BellSouth developed performance standards and  
11 measurements? If so, are they being met?"

12  
13 BellSouth has committed to the FCC and the Florida Public Service  
14 Commission ("FPSC or Commission") that the service provided to  
15 ALEC customers will be equal to the service provided BellSouth's own  
16 customers. This is in accordance with the FCC and FPSC orders in  
17 their respective dockets.

18  
19 In order to address this rather complex, interrelated set of items, my  
20 testimony will be grouped as follows:

21  
22 First, I will briefly discuss the existing measures used by BellSouth for  
23 services provided to its end user customers.

24  
25



1 Second, I will discuss the performance measures agreement BellSouth  
2 has reached with AT&T, and BellSouth's negotiations with other  
3 Alternative Local Exchange Companies (ALECs).

4

5 Third, I will discuss the groups of services which BellSouth has agreed  
6 to measure under the AT&T agreement.

7

8 Fourth, I will discuss the measurements which BellSouth has agreed to  
9 use for these services.

10

11 Fifth, I will discuss the process BellSouth has proposed for establishing  
12 target levels for these measurements, and for comparing similar  
13 measures.

14

15 Finally, I will discuss the steps BellSouth is taking in its organizational  
16 structure and process to insure parity of service for the ALECs, and the  
17 steps being taken to insure that the response time of the ALEC's  
18 Operations Support Systems (OSSs) is similar to BellSouth's retail  
19 systems.

20

21 Q. In general, what types of measures does BellSouth use for its own  
22 retail operations today?

23

24 A. BellSouth's retail operations track service performance results on a  
25 company-wide, and state-wide basis, for groups of customer services.

1 In general, the groups are separated in two ways: First, by the type of  
2 customer , (i.e. residence, small business, or large business); and  
3 Second, by the type of service provided, (i.e. Plain Old Telephone  
4 Service (POTS), which is also referred to as non-designed services,  
5 and designed or special services). BellSouth's proposed and  
6 negotiated measures for services provided to both ALECs and to  
7 BellSouth retail units generally follow this pattern. Further, this  
8 Commission has previously indicated that these measures are  
9 adequate in its approval of the AT&T arbitration agreement.

10

11 Q. Has BellSouth reached agreement on service quality and parity  
12 measurements with AT&T?

13

14 A. Yes. BellSouth and AT&T reached agreement on May 9, 1997, on  
15 performance measurements. These measures include both the parity  
16 measures and the non-discriminatory access to systems and services  
17 measures that I mentioned previously.

18

19 This specific agreement was signed in Georgia, but both parties have  
20 agreed to extend its provisions to all nine states where BellSouth  
21 provides services as an Incumbent Local Exchange Company (ILEC.)

22

23 Collection of data for these measurements has already begun.

24 BellSouth has agreed to produce these measurements for AT&T no

25

1 later than September, 1997, unless otherwise specified in the  
2 agreement.

3

4 Q. Has BellSouth reached agreement on performance measurements with  
5 other ALECs?

6

7 A. No. BellSouth is negotiating measures similar to those provided in the  
8 AT&T agreement with other ALECs, but no other agreements have  
9 been finalized with respect to performance measures.

10

11

12 Q. Did BellSouth and AT&T agree to and finalize all reporting  
13 requirements?

14

15 A. No. In Attachment 12, Section 1.4 of the BellSouth/AT&T contract  
16 requirements (Exhibit WNS-A), the following language appears:

17

18 "BellSouth and AT&T recognize that percentage target  
19 performance levels have not been provided for all  
20 measurements and that such targets for certain categories of  
21 performance will be required to improve performance, to  
22 maintain parity with that which BellSouth has obligated itself to  
23 provide under this Agreement, or to improve service as AT&T  
24 and BellSouth may mutually agree. BellSouth and AT&T agree  
25 to meet to discuss establishment of such targets quarterly,

1 starting no later than ninety (90) days after actual performance  
2 occurs. Such targets will reflect a negotiated level of  
3 performance. Notwithstanding the foregoing, AT&T reserves its  
4 right to request targets that exceed parity. Such a request may  
5 require AT&T to reimburse BellSouth for the reasonable and  
6 demonstrable cost BellSouth incurs to provide such  
7 performance, as the Parties may mutually agree.”  
8

9 Q. Please explain what categories of services will be measured under your  
10 agreement with AT&T.

11

12 A. The service groups (categories) we have agreed to are listed in Exhibit  
13 WNS-B, and are described below.

14 **1. POTS residence dispatch out:** Non-designed services provided  
15 to residential end users where the activity performed requires dispatch  
16 of a BellSouth technician to provision service or perform a repair  
17 activity. An example of this type of activity would be the installation of a  
18 new residence line in a location that had not previously had service.

19

20 **2. POTS residence non-dispatch out:** Non-designed services  
21 provided to residential end users where the activity performed does not  
22 require dispatch of a BellSouth technician to provision service or  
23 perform a repair activity. An example of this type of activity would be  
24 the addition of a switch feature like three-way calling to an existing  
25 customer's service.

1

2       **3. POTS business dispatch out:** Non-designed services provided to  
3       business end users where the activity performed requires dispatch of a  
4       BellSouth technician to provision service or perform a repair activity.  
5       An example would be the installation of a new business line in a  
6       location that had not previously had service.

7

8       **4. POTS business non-dispatch out:** Non-designed services  
9       provided to business end users where the activity performed does not  
10      require dispatch of a BellSouth technician to provision service or  
11      perform a repair activity. An example would be the addition of a switch  
12      feature like 3-way calling to an existing customer's service.

13

14      **5. UNE dispatch out:** Unbundled network elements (UNEs) provided  
15      to an ALEC for its end users where the activity performed requires  
16      dispatch of a BellSouth technician to provision service or perform a  
17      repair activity. An example of this type of activity would be the  
18      provisioning of an unbundled loop.

19

20      **6. UNE non-dispatch out:** Unbundled network elements provided to  
21      an ALEC for its end users where the activity performed does not  
22      require dispatch of a BellSouth technician to provision service or  
23      perform a repair activity. An example of this type of activity would be  
24      the provisioning of Interim Number Portability.

25

1       **7. Local Interconnection trunking:** All trunk groups between the  
2 ALEC and BellSouth.

3

4       **8. Designed Special Services:** All designed special services. An  
5 example of this type of activity is the installation or maintenance of DS-  
6 1 services.

7

8 Q.     Please explain what measurements are provided for in the AT&T  
9 agreement.

10

11 A.     The agreement provides for measurement of five categories of  
12 performance:

13             (1) Provisioning

14             (2) Maintenance

15             (3) Billing

16             (4) Databases (e.g. LIDB)

17             (5) Account Maintenance

18

19 Q.     What are the agreed to measurements and how do you define them?

20

21 A.     The defined measurements are described below. Other agreed to  
22 measurements such as desired due date are not yet defined.

23

24       The Provisioning measurements include:

25

1       **1. Percent Reject or Error Status Notification:** BellSouth can  
 2       measure rejects for electronically placed orders that occur up front -  
 3       before system processing begins - due to "fatal" errors caused by  
 4       incomplete or missing data or other serious and obvious problems.  
 5       BellSouth and AT&T are working closely together to further define error  
 6       handling standards. The proposed measurement is:

$$\begin{array}{c}
 7 \\
 8 \qquad \qquad \text{Number of Rejects or Error Status Sent in } < 1 \text{ hour} \\
 9 \qquad \qquad \qquad \qquad \qquad \qquad \qquad \qquad \text{(whatever interval is set)} \\
 10 \qquad \qquad \qquad \qquad \qquad \qquad \qquad \qquad \text{divided by} \\
 11 \qquad \qquad \qquad \qquad \qquad \qquad \qquad \qquad \text{Total Number of Rejects or Error Status Sent}
 \end{array}$$

12  
 13       **2. Percent Firm Order Confirmation (FOC) per interval:** BellSouth  
 14       will provide this measurement for orders that flow through mechanically  
 15       and entirely without human intervention, excluding rejects. No  
 16       programming has been initiated or planned that will provide a  
 17       residence/business split. The proposed measurement to be performed  
 18       weekly for 90 days and then be reevaluated is:

$$\begin{array}{c}
 19 \\
 20 \\
 21 \qquad \text{Total Number of FOCs Sent } < 4 \text{ hr., } 6 \text{ hr., } 8 \text{ hr., } 12 \text{ hr., } 24 \text{ hr., over } 24 \\
 22 \qquad \text{hours} \\
 23 \qquad \qquad \qquad \qquad \qquad \qquad \qquad \qquad \text{divided by} \\
 24 \qquad \qquad \qquad \qquad \qquad \qquad \qquad \qquad \text{Total Number of FOCs sent per total interval}
 \end{array}$$

25

1

2 **3. Percent Appointments Met:** BellSouth does not measure the  
 3 intervals involved in provisioning services to either its retail customers  
 4 or ALEC customers directly. Instead, both the BellSouth retail units  
 5 and the ALECs are given access to BellSouth's due date calculation  
 6 processor. This process calculates the next available due date based  
 7 on a set of factors including the type of work required for the  
 8 provisioning activity and the existing workload for the installation group  
 9 in that area. The available due dates for each type of activity are  
 10 offered on a first come-first served basis.

11

12 Since the due dates (and the intervals) vary according to several  
 13 factors, the most appropriate measure of provisioning timeliness is a  
 14 measure of how well the due dates are met, once they have been  
 15 established.

16

17 Total Appointments Met

18 divided by

19 Total Appointments Set

20

21 **4. Percent Trouble Reports within 30 Days of installation:**

22

23 All troubles on service installed < 30 days in a calendar month

24 divided by

25 Installations in a calendar month



1  
2  
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Note: Numerator and Denominator are not the same order base for POTS service due to the way the measurement data is collected.

For Specials only, measurement will be calculated where the Numerator and Denominator are the same order base.

Troubles on service installed < 30 days

divided by

Installations in a calendar month

The Maintenance measurements include:

**1. Average Duration (in hours):** Will be measured for troubles classified as either total outage or service affecting using BellSouth's existing definitions and testing capabilities to make this determination.

For POTS services:

Total Duration Time

divided by

Total Troubles

1 For Specials and Local Interconnection/Trunking:

2  
3 Responsible Duration Time (using Industry Definition)

4 divided by

5 Total Troubles

6  
7 **2. Percent Appointments Met:** This measure excludes appointments  
8 missed for ALEC reasons or ALEC end user reasons.

9  
10 Total Appointments Met

11 divided by

12 Total Appointments Set

13  
14 NOTE: See the explanation above for Provisioning Appointments.  
15 Similar logic applies to the maintenance appointment setting process.

16  
17 **3. Percent Repeat Reports in 30 Days:** Includes all repeat reports  
18 except those that BellSouth is not involved with such as Customer  
19 Provided Equipment (CPE).

20  
21 Total Repeats < 30 Days

22 divided by

23 Total Troubles

24

25

1       **4. Report Rate:** Will be provided for POTS/Non-Designed and  
 2       Designed Specials only. Until the reporting base becomes fairly  
 3       sizable, parity comparisons may be difficult. Measurement reflects  
 4       troubles/100 access lines.

5

$$\begin{array}{c}
 \text{Number of Trouble Reports per Month} \\
 \text{divided by} \\
 \text{Total Number of Lines}
 \end{array}$$

9

10       **5. Percent Calls Answered in 30 Seconds in BellSouth Repair**  
 11       **Center:** BellSouth will provide this measurement with ALEC specific  
 12       results when the ALEC Repair Center is established later in 1997.

13

14       The Billing measurements include:

15

16               **1. Timeliness of daily usage messages delivered via the**  
 17               **ConnectDirect system:** Target is to be equal to or greater than  
 18               95%

19

20               **2. Completeness of Recorded Usage Data delivered within**  
 21               **30 days of the message create date:** Target is to be equal to  
 22               or greater than 98%

23

24

25

1           **3. Recorded Usage Data Accuracy Transmitted Correctly in**  
2           **the current Bellcore EMR format:** Target is to be equal to or  
3           greater than 98%

4  
5           **4. Recorded Usage Data transmission:** Target is to be error  
6           free, with specified resolution intervals for any modification  
7           requests

8  
9           **5. Data Packs sent error free:** Target is 96%

10

11           The Data Base measurements include:

12

13           **1. Line Information Data Base (LIDB):** Target is to process  
14           within 1 second for 99% of all messages under normal  
15           conditions

16

17           **2. LIDB Message Round Trip Time:** Target is to process  
18           within 2 seconds for 99.9% of all queries under normal  
19           conditions

20

21           **3. Measure to be developed:** LIDB query reply rate - 99.9%

22

23           **4. Measure to be developed:** LIDB query time out - less than  
24           0.1%

25

1 The Account Maintenance Measurements include:

2

3 **1. Notification of switch of an AT&T customer to another**  
4 **ALEC: within 1 business day**

5

6 **2. Interexchange carrier Preferred Interexchange Carrier**  
7 **(PIC) changes: Provisioned and completed within 1 business**  
8 **day via the work order completion feed**

9

10 **3. Rejection of "01" PIC change requests for AT&T**  
11 **customers: Less than one business day**

12

13 Q. How does BellSouth propose to separate AT&T's results and other  
14 ALEC's results for comparison to BellSouth's own retail service  
15 results?

16

17 A. BellSouth tracks service performance on a company-wide and on an  
18 individual state basis. Reports for BellSouth state results compared to  
19 all ALECs operating in that state will be produced monthly. Reports for  
20 individual ALECs will be provided in accordance with the terms and  
21 conditions of individual ALEC contracts.

22

23 Q. Now that you've discussed the groups of services to be measured, and  
24 the types of measurements to be used, what is BellSouth's proposal for

25

1 establishing target levels for those services which BellSouth provides to  
2 both the ALECs and BellSouth retail units?

3

4 A. BellSouth generally proposes the use of statistical process control  
5 measures to determine whether those services are being provided at  
6 parity.

7

8 BellSouth performance data historically has variations from month to  
9 month due to many factors, such as severe weather, damage to  
10 company facilities, or other events that cannot be anticipated. It is  
11 therefore important to study performance results over several months  
12 to determine what the acceptable upper and lower limits for various  
13 performance measures should be. This is done by plotting the  
14 monthly results on a graph or control chart. This creates a picture of  
15 the performance. Once data has been collected for a number of  
16 months (generally at least six), upper and lower levels of performance  
17 can be established.

18

19 The proposed reporting format would use the historical and current  
20 performance of BellSouth as the standard to establish statistical  
21 process control parameters, using the process control chart format.  
22 After BellSouth's performance is used to establish the basic  
23 parameters (average, upper control limit, lower control limit) of the  
24 control chart, the services BellSouth performs for all ALECs would be  
25 superimposed on this same chart. Once control limits are established.

1 a comparison can easily be made between the BellSouth data and the  
2 ALEC data. This type of comparison will be made for each agreed to  
3 group of services where BellSouth provides similar retail services to its  
4 retail customers.

5  
6 When reviewing comparative data (BellSouth compared to ALECs) on  
7 a control chart, as long as the monthly performance is within the  
8 established upper and lower limits there generally would not be any  
9 concern unless one of the entities (i.e., an ALEC), was, for three  
10 consecutive months, higher or lower than the other two. This would  
11 merit an investigation or a study referred to as "root cause analysis", to  
12 determine the reason for the consistent variation. Once this has been  
13 accomplished, a plan for corrective action would be initiated. This  
14 method of analyzing data avoids overreacting to a one month spike and  
15 focuses on processes to insure consistent performance. An example  
16 of a control chart is included as Exhibit WNS-C, and is discussed  
17 below.

18  
19 The process control chart labeled Business Appointments Met (Exhibit  
20 WNS-C), has 27 months of data on BellSouth Business Appointments  
21 Met. It also has 4 months of this same type of data for all ALECs  
22 operating in any of the nine BellSouth states, January, 1997 through  
23 April, 1997. Normally more than 4 months data would be used before  
24 valid conclusions would be made, but this chart is being produced for  
25 illustrative purposes. On this chart the upper control limits were

1 established based on BellSouth's historical performance at an upper  
2 control limit of 90% and a lower control limit of 77.5%. The ALEC data  
3 for January 1997 was below the lower limits and was investigated.  
4 However February, March, April and May results improved and the  
5 actual performance was above that of BellSouth.

6

7 Q. What is BellSouth's proposal for establishing these target levels for the  
8 systems and services that BellSouth provides only to its ALEC  
9 customers?

10

11 A. BellSouth recognizes that insufficient historical data exists to establish  
12 process control measures for those systems and services and has  
13 agreed with AT&T to begin measurement of that data, and to continue  
14 to discuss targets as previously discussed. Additionally, BellSouth has  
15 published a set of target intervals for provisioning UNEs (Exhibit WNS-  
16 D) and is preparing a similar set of target intervals for maintenance of  
17 UNEs. These intervals will be used to establish the provisioning and  
18 maintenance due dates for the UNE categories, and will allow us to  
19 begin to generate the data for future Statistical Process Control (SPC)  
20 measurements. Until sufficient data is collected for each service  
21 category, BellSouth proposes using negotiated measures to set  
22 estimated values for the average, the upper control limit, and the lower  
23 control limit, and to adjust these as additional data becomes available.  
24 The time period to accumulate statistically valid data for each category

25



1 is a function of the ALECs' ordering volume in each state and in each  
2 service category, and cannot be accurately predicted at this time.

3

4 Q. Do these process control measurement methods relate to BellSouth's  
5 agreement with AT&T?

6

7 A. Yes. This measurement method does a good job of demonstrating  
8 performance. For the provisioning and maintenance measures, the  
9 groups of service to be measured and the specific measure(s) to be  
10 applied to each group are listed in the table in Exhibit WNS-B. Where  
11 the table entry SPC is shown, BellSouth believes that sufficient  
12 historical data exists to establish statistical process control measures  
13 by September, 1997. Where the entry "IP" is shown, BellSouth  
14 historical data does not exist, and appropriate interim process control  
15 limits must be negotiated between BellSouth and the ALECs.

16

17 Q. Has data for any of these measurements already been collected?

18

19 A. No. These measures were agreed to on May 9, 1997, so no historical  
20 data is available for many of the specific categories at this time. In the  
21 interim, BellSouth has been collecting data for a set of existing  
22 measures to compare the services provided to BellSouth retail  
23 customers with those provided to ALEC end users. Additionally,  
24 BellSouth has collected the data for its provisioning of certain  
25 unbundled network elements (those designed for end user service),

1 and for the local interconnection trunking services installed for the  
2 ALECs. This data for these UNE measures for the first five (5) months  
3 of 1997 is shown in Exhibit WNS-E.  
4

5 Q. In addition to the measurements we've discussed at length, what steps  
6 has BellSouth taken to ensure service parity in its operations centers  
7 and provisioning and maintenance processes?  
8

9 A. In recognition of the changing business and regulatory environments,  
10 BellSouth began development work in May, 1995, to create a process  
11 for handling the provisioning, maintenance and repair of all  
12 interconnection facilities, resold services, and unbundled network  
13 elements provided to the ALECs. Since that time, BellSouth has  
14 created an entire new officer level organization, Interconnection  
15 Operations, which is responsible for all operational aspects of  
16 provisioning and maintaining services for ALECs. For resale and  
17 unbundled network element ordering, two Local Carrier Service  
18 Centers (LCSCs) located in Birmingham and Atlanta serve as contact  
19 points for ALECs ordering services for resale. Ordering of UNEs for  
20 facility based service offerings is handled in these same centers. A  
21 Customer Support Manager is assigned to each ALEC to provide a  
22 single liaison point if the ALEC customers have operational issues that  
23 are not satisfactorily resolved by the normal center processes.  
24  
25

1        Additionally, due to the complexity of managing service for large end  
2        users, BellSouth established a group of project management  
3        specialists as a separate part of the LCSC to provide project  
4        coordination for this type of conversion. Finally, for day-to-day  
5        provisioning activities for unbundled network elements, BellSouth  
6        established UNE Centers staffed with highly trained technicians to  
7        coordinate the provisioning activities required to install the various UNE  
8        products.

9  
10        At this time, if the ALEC chooses not to use the Trouble Analysis  
11        Facilitation Interface (TAFI) electronic interface for its end user's trouble  
12        reports, the repair services for TAFI supported services are  
13        incorporated into existing BellSouth operations, insuring that the  
14        ALECs receive high quality maintenance and repair services on parity  
15        with that provided to BellSouth's retail operations. BellSouth is  
16        examining the possibility of creating a separate repair center dedicated  
17        to ALEC resale services, when sufficient volume develops.

18  
19        Additional managers and support personnel have recently been added  
20        to these existing centers and will continue to be added as needed to  
21        support increased ALEC activity. ALECs choosing not to use available  
22        electronic trouble reporting interfaces are provided contact numbers to  
23        submit trouble reports, have trouble testing performed on POTS lines,  
24        have repair teams dispatched, and check on the status of repairs.

25

1 Local interconnection and trunking provisioning and maintenance are  
2 provided by BellSouth's Access Customer Service Centers (ACSCs)  
3 which are also part of the Interconnection Operations division. The  
4 ACSCs have provided similar services to the Interexchange Carriers  
5 (IXCs) for several years. BellSouth technicians in the ACSC directly  
6 interface with the ALECs to perform turn-up, testing, and repair of  
7 interconnection facilities. These technicians must pass a complex  
8 technical test to fill these positions. In addition, BellSouth has a  
9 customized training curriculum which qualifies technicians to support  
10 facility-based ALECs. The training period for these employees is  
11 approximately twenty-nine (29) days.

12  
13 In summary, BellSouth is committed to provide all of these operations  
14 centers with sufficient resources to meet the demands of the ALECs.  
15 BellSouth has forecasts of expected transaction/order volumes  
16 gathered directly from our ALEC customers by the BellSouth account  
17 team responsible for each individual ALEC account. This information  
18 allows BellSouth to project ordering volumes, provisioning volumes,  
19 and trouble reporting volumes from the ALECs based upon BellSouth's  
20 own experience. Staffing initiatives, internal and external hiring, and  
21 training have been deployed to enable BellSouth to effectively  
22 anticipate ALEC provisioning and maintenance expectations.

23  
24 For provisioning, ALECs can place orders directly for interconnection  
25 facilities through one of the electronic interfaces or manually with the

1 LCSC. In either case, BellSouth's operational support systems  
2 produce a work order which is received by the appropriate BellSouth  
3 network group (resale and UNEs), or by the UNE center. Upon receipt  
4 of the work order, the appropriate technician performs turn-up and  
5 testing on the interconnection facilities and unbundled elements, and  
6 the results are provided to the ALEC. If the circuit is accepted by the  
7 ALEC, the order is completed and billing begins.

8  
9 In the case of maintenance and repair, ALECs can submit trouble  
10 reports for resold services, interconnection facilities, and unbundled  
11 network elements directly through one of the electronic interfaces or  
12 manually with the appropriate repair center.

13  
14 If the ALEC has chosen to use the ALEC Trouble Analysis Facilitation  
15 Interface (TAFI) the ALEC's representative can input the report directly  
16 into the ALEC-TAFI system and can handle the trouble in the same  
17 manner as comparable troubles are handled by BellSouth for its retail  
18 customers. This is precisely how trouble reports are handled on POTS  
19 lines for BellSouth's retail customers.

20  
21 If the ALEC chooses not to use the TAFI electronic interface for its end  
22 users' trouble reports, the repair services for TAFI supported services  
23 are incorporated into existing BellSouth operations, ensuring that the  
24 ALECs receive high quality maintenance and repair services on parity  
25 with that provided BellSouth's retail customers.

1  
2 Trouble reports received on interconnection facilities or other designed  
3 services are entered into BellSouth's Work Force Administration  
4 system (WFA). Again, the ALEC has the choice of the electronic  
5 bonding interface or manual reporting. In either case, a commitment  
6 time for restoration or repair of these services is not provided with  
7 regard to either BellSouth or ALEC services, since repairs are  
8 performed on a "first-in, first-out" basis without regard to the retail of the  
9 service, depending upon the class of service in the following list of  
10 priority: DS3, DS1, DDS, and voice grade private line. The ACSC  
11 technician performs testing of the circuits, and trouble reports are  
12 dispatched to the appropriate organization for performance of  
13 maintenance and repairs. While maintenance and repair activity is  
14 pending or underway on a trouble report, ALECs may call the ACSC for  
15 status reports and the estimated time when repairs will be completed.

16

17 Q. Finally, what can you tell us about the measures BellSouth has taken  
18 to insure that the response times for its ALEC OSSs are substantially  
19 the same as BellSouth's retail systems?

20

21 A. BellSouth has begun a series of tests to obtain statistically valid data to  
22 compare time intervals required for a service representative using Local  
23 Exchange Navigation System ("LENS") to perform certain OSS  
24 functions with the time intervals required for a service representative  
25 using the Regional Negotiation System (RNS) or Direct Order Entry

1 (DOE) to perform the comparable function. These tests were designed  
2 with the assistance of statisticians from BellSouth's corporate quality  
3 group, to insure the validity of the data collection. These tests will be  
4 conducted as described below.

5

6 1. BellSouth will remotely observe the order entry process in each of  
7 the systems on random days.

8

9 2. BellSouth will collect a sample set of actual orders from the random  
10 observations (approximately 100) for each system: DOE, RNS, LENS.

11

12 3. BellSouth will analyze the types of orders received in the typical  
13 sample set.

14

15 4. BellSouth will track the orders with these four data elements: Serial  
16 number (sample number), BellSouth system order number (or  
17 telephone number), type of order, and system response time for each  
18 pre-ordering section of the order.

19

20 5. The data collected in 4 above will be analyzed to determine the high  
21 and low time-frames for pre-ordering system responses while ordering  
22 through these systems.

23

24 These experiments include measures of system response time  
25 intervals for:

- 1           •     Accessing a Customer Service Record (pre-ordering);
- 2           •     Validating an Address (pre-ordering);
- 3           •     Obtaining a Telephone Number Assignment (pre-
- 4                     ordering);
- 5           •     Obtaining a List of the Features and Services Available
- 6                     for a Central Office (pre-ordering);
- 7           •     Obtaining a Due Date from the Due Date Support
- 8                     Processor for an Order (ordering).

9

10           The experimental design of this validation effort has only been

11           completed recently, and complete results are not yet available.

12           However, additional results will be available by the hearing date. The

13           preliminary results from these tests are given below.

14

15           Preliminary System Response Time Measurements (seconds)

16

	LENS	RNS	DOE
17           Address	5.9	4 - 6	5.4
18           Validation			
19           Tel Number	4.1	----	4.8
20           assignment			
21           Features	6.8	4 - 6	5.0
22           / Services			
23           DD calculation	4.5	---	4.9

24

25



1

2 Q. What data has BellSouth collected to date that would compare its  
3 performance to ALECs with BellSouth's performance to its own retail  
4 customers?

5

6 A. I have included data for the first five months of 1997, which makes  
7 such a comparison, as Exhibit WNS-F which is attached to my  
8 testimony. For the two broad categories of Residence Resale Services  
9 and Business Resale Services, I show selected critical items which  
10 BellSouth has historically used to manage its own performance. These  
11 measurements include the following:

- 12 1. The percent of due dates met in provisioning orders for service;
- 13 2. The trouble report rate per 100 access lines in service;
- 14 3. The percent trouble reports which are resolved in less than 24  
15 hours;
- 16 4. The average duration in hours of the interval from receipt of a  
17 trouble until it is cleared;
- 18 5. The percent of missed appointments for maintenance reports;
- 19 6. The percent of trouble reports on the same line received within  
20 30 days; and
- 21 7. The percent trouble reports within thirty days of the installation of  
22 new service.

23

24

25

1 For each of these categories, I have shown, where available, the  
2 performance for ALECs in Florida, all ALECs in BellSouth's nine-state  
3 region, and comparable total data for all of BellSouth's retail customers.  
4

5 Q. What conclusions do you believe can be drawn from the performance  
6 data thus far?

7  
8 A. In every category, it is clear that the ALECs have received service  
9 which is comparable to, and which is in most cases better than, the  
10 service received by BellSouth's retail customers.  
11

12 While performance for ALECs in Florida is generally consistent with the  
13 overall performance to ALECs in the nine-state region, comparing  
14 overall performance to ALECs in the nine-state region with  
15 performance to BellSouth's retail customers provides a more  
16 statistically stable view. I have highlighted the "best" performance in  
17 each category by showing that valued in bolded, underlined text. A  
18 quick glance is all that is needed to reach the conclusion that ALECs'  
19 customers are indeed receiving service at least in parity with or better  
20 than is provided to BellSouth retail customers.  
21

22 Q. Please cite a specific example.

23

24 A. In the category measuring the percent of business customers who were  
25 out of service for less than 24 hours (Percent OOS<24 Hours),

1 performance to ALEC customers was better in all cases than to  
2 BellSouth retail customers as follows: January (91.2% compared to  
3 80.2%), February (91.1% compared to 86.3%), March (83.9%  
4 compared to 80.9%), April (90.1% compared to 85.1%) and May  
5 (85.1% compared to 84.5%).

6

7 Q. Please summarize your testimony.

8

9 A. BellSouth has put organizations and processes in place to ensure  
10 service parity in its operations centers. BellSouth has aggressively  
11 developed a process for handling the ordering, provisioning,  
12 maintenance and repair of all interconnection facilities, resold services  
13 and unbundled network elements provided to ALECs. These efforts  
14 include the creation of a new officer level organization within BellSouth  
15 responsible for these activities. These operations centers are  
16 established and functional and, as has been shown by comparisons of  
17 service provided to ALECs with service provided to BellSouth retail  
18 customers, are providing service levels at parity with that BellSouth  
19 provides to its own customers.

20

21 BellSouth has also worked hard to create efficient systems which allow  
22 ALECs access to those BellSouth operations support systems required  
23 by ALECs for pre-ordering, ordering, provisioning, maintenance and  
24 billing functions. Interfaces to these systems were designed and  
25 developed considering ALEC forecasts of work volumes that these

1 systems would be required to respond to. BellSouth is proud of its  
2 results in making these effective, efficient tools available to the ALECs.  
3 In some cases, for whatever their reasons, a few ALECs have chosen  
4 not to avail themselves of these tools. While such a decision is  
5 certainly the ALEC's to make, the systems and procedures BellSouth  
6 has developed and put in place are fully capable of accommodating the  
7 originally forecast demand. As needed, BellSouth will add even more  
8 processing capacity to these systems to provide for future ALEC  
9 demand.

10

11 Q. Does this conclude your testimony?

12

13 A. Yes.

14

15

16

17

18

19

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25

1 BY MR. RANKIN:

2 Q Mr. Stacy, did you have exhibits attached to your  
3 prefiled testimony?

4 A Yes, I did.

5 Q How many were there?

6 A There were six exhibits.

7 Q Do you have any additions, deletions, or  
8 corrections to those exhibits?

9 A I have one addition to those exhibits. During my  
10 deposition, the staff had requested that I update Exhibit E  
11 and F of my direct testimony with the most recent  
12 information available, and that information has been  
13 produced and just distributed a few moments ago.

14 MR. RANKIN: With those replacement Exhibits E  
15 and F, Madam Chairman, I would ask that Mr. Stacy's exhibits  
16 be marked as the next hearing exhibit. I believe it's  
17 Exhibit 50.

18 CHAIRMAN JOHNSON: 51.

19 MR. RANKIN: 51.

20 CHAIRMAN JOHNSON: And, I'm sorry, what were  
21 they?

22 MR. RANKIN: The exhibits, replacements or  
23 updates to his exhibits which have been distributed, are  
24 Exhibit WNS-E, which consists of four pages, and behind that  
25 is Exhibit F. That's it.

1 CHAIRMAN JOHNSON: We will mark those 51.

2 (Exhibit Number 51 marked for identification.)

3 BY MR. RANKIN:

4 Q Mr. Stacy, did you also cause to be prepared in  
5 this docket prefiled rebuttal testimony totalling 18 pages?

6 A Yes, I did.

7 Q Do you have any additions, deletions, or  
8 corrections to that testimony?

9 A No.

10 Q If I asked you the same questions here today  
11 would your answers to those questions be the same?

12 A Yes, they would.

13 MR. RANKIN: Madam Chairman, I would ask that the  
14 prefiled rebuttal testimony of Mr. Stacy be inserted into  
15 the record as if given orally from the stand.

16 CHAIRMAN JOHNSON: It will be so inserted.

17

18

19

20

21

22

23

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25

1 BELL SOUTH TELECOMMUNICATIONS, INC  
2 REBUTTAL TESTIMONY OF WILLIAM N. STACY  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4 DOCKET 960786-TL  
5 JULY 31, 1997  
6  
7

8 Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH  
9 BELL SOUTH TELECOMMUNICATIONS, INC. (BELL SOUTH).

10

11 A. My name is William N. Stacy. My business address is 675 West Peachtree  
12 Street, Room 4410, Atlanta, GA 30375. I am the Assistant Vice President -  
13 Services for the Interconnection Operations Department of BellSouth  
14 Telecommunications Inc. ("BellSouth"). In this position I am responsible for  
15 development of the procedures used by BellSouth personnel to process  
16 Alternative Local Exchange Company (ALEC) service requests, and for  
17 assisting the service centers in Interconnection Operations in implementing  
18 ALEC contracts in a manner consistent with State Commission and Federal  
19 Communication Commission (FCC) rules and regulations governing local  
20 exchange competition.

21

22 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

23

24 A. I received a Bachelor of Science degree in electrical engineering in 1970  
25 from the University of Kentucky, in Lexington, KY. I have 27 years of

1 experience with BellSouth, including 5 years with BellSouth Enterprises at  
2 MobileComm, a paging company previously owned by BellSouth. I have  
3 held numerous positions in BellSouth in Network Engineering, Operator  
4 Services, Network Planning, and Network Operations. I am a registered  
5 professional engineer in the states of Alabama, Kentucky and Mississippi.

6

7 Q. ARE YOU THE SAME WILLIAM N. STACY WHO FILED DIRECT  
8 TESTIMONY IN THIS PROCEEDING?

9

10 A. Yes.

11

12 Q.. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

13

14 A. The purpose of my testimony is to respond to the testimony filed in this  
15 docket by Ronald Martinez of MCI Telecommunications Corporation ("MCI"),  
16 C. Michael Pfau of AT&T Communications of the Southern States, Inc.  
17 ("AT&T"), Douglas Kinkoph of the Florida Competitive Carriers Association  
18 ("FCCA") , John Hamman of AT&T, Julia Strow of Intermedia  
19 Communications Inc. ("ICI"), Melissa Cloz of Sprint Communications  
20 Company L.P. ("Sprint"), and Robert W. McCausland of Worldcom, Inc.  
21 ("Worldcom") as it relates to the appropriate performance measurements. I  
22 will also respond to comments made by Mr. Kenneth A. Hoffman in Teleport  
23 Communications Group, Inc.'s ("TCG") answer to the Petition of BellSouth  
24 Telecommunications, Inc. which was filed with the Commission on July 28,  
25 1997.



1

2 **REBUTTAL OF MR. MARTINEZ' TESTIMONY (MCI)**

3

4 Q. ON PAGE 16 OF MR. MARTINEZ' TESTIMONY, HE STATES THAT  
5 BELLSOUTH SHOULD ADOPT AND COMMIT TO PERFORMANCE  
6 MEASUREMENTS. HAS BELLSOUTH ADOPTED AND COMMITTED TO  
7 SUCH MEASUREMENTS ?

8

9 A. Yes. BellSouth has negotiated a set of performance measurements with  
10 AT&T and has filed a signed agreement to this effect with the Florida Public  
11 Service Commission (the Commission or FPSC). Many of these  
12 measurements are similar to those contained in the FPSC rules to which  
13 BellSouth is required to adhere. It was therefore fitting to include these in  
14 the AT&T agreement as well as future negotiations with other ALECs.

15

16 These performance measurements measure parity in the services that BST  
17 provides to the ALECs and to BST retail customers. These measurements  
18 contained in the AT&T agreement also provide performance targets to  
19 ensure non-discriminatory performance in areas such as unbundled network  
20 elements, billing, and access to databases.

21

22 Q. HAS THE COMMISSION ADDRESSED THE ISSUE OF PENALTIES  
23 RAISED BY MR. MARTINEZ?

24

25

1 A. Yes. MCI proposed in the arbitration (Docket 960833 -TP and Docket  
2 960846 - TP) that the Commission adopt provisions that would impose upon  
3 BellSouth various sanctions associated with any failure by BellSouth to meet  
4 certain performance measurements. The FPSC Staff recommended and the  
5 Commission agreed that they would not mandate liquidated damages. The  
6 Commission subsequently approved the MCI - BellSouth interconnection  
7 agreement. That agreement does not contain the penalty provision that Mr.  
8 Martinez wants to add to the SGAT.

9  
10 Q. HAS BELL SOUTH PROPOSED TO EXTEND THE PERFORMANCE  
11 MEASURES AGREED TO WITH AT&T TO OTHER ALECS OPERATING IN  
12 FLORIDA?

13  
14 A. Yes. BellSouth has held discussions with MCI, LCI, Time Warner and others  
15 regarding these same measures. BellSouth has also proposed these  
16 measures as part of the Draft Statement of Generally Available Terms and  
17 Conditions (SGAT) filed as part of this docket.

18  
19 **REBUTTAL OF MR. PFAU'S TESTIMONY (AT&T)**

20  
21 Q. MR. PFAU ADVOCATES THE USE OF THE LOCAL COMPETITION  
22 USERS GROUP (LCUG) PREPARED METRICS AND PROPOSES THESE  
23 AS THE "STARTING POINT FOR MONITORING PARITY OF  
24 PERFORMANCE." DOES BELL SOUTH AGREE?

25

1 A. No. BellSouth and AT&T have negotiated an agreement on a set of  
2 performance measurements applicable to all nine states in BellSouth's  
3 region. This same agreement has been filed with this Commission. This  
4 agreement, as Mr. Pfau references in his testimony, contains a section  
5 entitled Performance Measurement and is Attachment 12 of the signed  
6 agreement between BellSouth and AT&T.

7

8 Mr. Pfau's Florida testimony makes it appear that he wishes to unilaterally  
9 re-open negotiations on these measurements even after the agreement has  
10 been signed. He proposes both additional measurements and modifications  
11 to measures already agreed upon. I do not believe the good faith  
12 negotiations between the two companies were intended to encourage such  
13 comments after the agreement was reached.

14

15 Second, in proposing the performance benchmarks recommended by the  
16 Local Competition Users Group (LCUG) (Pfau Exhibit CMP-2), Mr. Pfau has  
17 completely ignored the issue of parity with those services BellSouth provides  
18 to its retail customers. He discusses the need to create meaningful parity  
19 measurements at some length. Then, instead of proposing parity  
20 measurements, he has proposed an arbitrary set of benchmarks. Unlike the  
21 parity measurements in the AT&T - BellSouth agreement, these benchmarks  
22 do not take into account either the levels of service this Commission has  
23 deemed adequate for the Florida customers in the past, or the day to day  
24 adjustments in due dates and service intervals essential to BellSouth's

25

1 efficient, cost effective management of its service obligations to existing and  
2 future customers in Florida.

3

4 Q. BEGINNING ON PAGE 10 OF HIS TESTIMONY, MR. PFAU DISCUSSES  
5 SEVERAL PERFORMANCE MEASUREMENTS THAT HE INDICATES  
6 MUST BE ADDRESSED IN ADDITION TO THE MEASUREMENTS IN THE  
7 AT&T - BELL SOUTH AGREEMENT. WOULD YOU COMMENT ON THESE  
8 ADDITIONS.

9

10 A. Yes. Mr. Pfau mentions nine (9) areas that he feels are not addressed in the  
11 AT&T-BellSouth Agreement. I will summarize each of them and then  
12 provide my response:

13

14 (1) *Pfau: Timeliness measures for the primary preordering and maintenance*  
15 *activities must be incorporated.*

16

17 Timeliness measurements for assessing BellSouth's Pre-ordering system  
18 have been manual. An automated timing process to compare the response  
19 times of BellSouth's retail customer entry through RNS (Regional  
20 Negotiation System) and an ALEC's entry through the LENS (Local  
21 Exchange Negotiation System) is being developed. In addition BellSouth,  
22 through negotiations with AT&T, is developing an alternate system EC-LITE  
23 (Electronic Communications Lite) that is designed to provide identical access  
24 capabilities to BellSouth's various information databases system using a  
25 programmatic method that should be acceptable to all parties.

1  
2 The time required to log a trouble ticket mentioned by Mr. Pfau is simply not  
3 a relevant measure in this consideration. As Mrs. Calhoun has testified,  
4 BellSouth has made its Trouble Facilitation Analysis Interface (TAFI)  
5 available to AT&T and all other ALECs. This interface is identical to the  
6 interface being used by BellSouth's repair representatives. Since the  
7 systems are identical, the time to "log" a trouble ticket is dependent on the  
8 skill of the customer contact representative - not on the system. A  
9 comparison of AT&T's skills in this area to BellSouth's does not seem to be  
10 a measure of timeliness but rather a measure of the relative efficiency of the  
11 two organizations.

12

13 (2) *Pfau: Timeliness measures for return of order completion must be established.*

14

15 BellSouth's provisioning system provides for automatic updating of the  
16 status once an order has been completed by a BellSouth network technician  
17 or by a network system. These notifications are posted automatically to the  
18 Local Exchange Ordering database for the ALEC to view or retrieve. Since  
19 these compilations are posted after the service has been installed or  
20 changed for the ALEC's end user, they are an after the fact notification. The  
21 appropriate measure of timeliness in this instance is the measure of whether  
22 the due date committed to the end user was met. This measure (Percent  
23 Due Date met) is already incorporated in the AT&T - BellSouth agreement.

24

25

1 (3) *Pfau: System availability measures must be defined for each operational*  
2 *interface.*

3

4 System availability has not been an issue in BellSouth's retail operation.  
5 Downtime for normal system maintenance has generally been in late  
6 evening and not had impact on operations. As a result of negotiations with  
7 ALECs, BellSouth is developing a system availability measurement.

8

9 (4) &(5) *Pfau: Availability measures for network elements and performance*  
10 *measures for network elements must be addressed.*

11

12 Measurements and transmission requirements for BellSouth and other  
13 ILEC's network performance requirements, both InterLATA and IntraLATA,  
14 are detailed in the General Subscriber Service Tariff, Private Line Tariff,  
15 Access Service Tariff and Florida Public Service Rules and Regulations on  
16 file with this Commission. The only thing missing which would provide a  
17 complete picture of service provided to Florida end users is a duplicate set of  
18 measurement requirements on ALECs for their own facilities and systems.

19

20 (6) *Pfau: Operator Service ("OS") and Directory Assistance ("DA") speed of answer*  
21 *measures must be incorporated.*

22

23 These measures are in place today, and are regularly reported to the  
24 Commission. The addition of other trunk groups carrying ALEC traffic to

25

1 BellSouth's Operator Services and Directory Assistance units will not change  
2 the fact or the substance of these measures.

3

4 (7) *Pfau: Network Performance measures (e.g., transmission quality and*  
5 *completion rates) must be addressed..*

6

7 The most accurate measure of the performance of the network is the ability  
8 of the end users to utilize the network for service from BellSouth or an  
9 ALEC. Rather than instituting an arbitrary set of network performance  
10 measures, the Commission should continue to depend on the end users of  
11 the services to report whether those services are meeting their requirements.  
12 This can be accomplished using the trouble reporting process, and the  
13 measurements described in items (4) and (5) above, as well as those  
14 measurements included in BellSouth's agreement with AT&T. The  
15 comparison of the results provided for BellSouth's end users with the service  
16 provided to AT&T 's (or other ALEC's) end users will demonstrate parity of  
17 network performance.

18

19 (8) *Pfau: Fallout to manual processing must be monitored.*

20

21 Mr. Pfau apparently is more concerned with measurements of BellSouth's  
22 internal processes than he is with providing service to AT&T's newly  
23 acquired end users. If his concern were focused on the end users, he would  
24 recognize that the measure for Due Dates met, provided in the AT&T-

25

1 BellSouth contract, combines all of his suggested process measures into a  
2 meaningful measure of the timeliness of providing service to the end user.

3

4 (9) *Pfau: Capacity measurements must be developed; for example, a measure that*  
5 *monitors the average delay (e.g., days) in the actual completion date*  
6 *compared to committed date.*

7

8 Once again, Mr. Pfau has failed to recognize that his concerns have already  
9 been addressed in the AT&T-BellSouth agreement in a context that is more  
10 meaningful to the end user of the service. AT&T has access to the same  
11 due date system, DSAP, the Direct Order Entry (DOE) Support Application  
12 Processor, that BellSouth uses internally. This system automatically selects  
13 the earliest available due date regardless of whether BST, AT&T, or another  
14 ALEC is inputting the service order. The measurement in the AT&T-  
15 BellSouth agreement on how often the completion date matches the  
16 committed or due date is the percent met service order appointments. A  
17 comparable process in BellSouth maintenance systems provides the percent  
18 repair appointments met. This information will be provided in September for  
19 ALECs who have signed agreements with BST. The information will include  
20 BST's comparable statistics. This information will demonstrate parity. As  
21 further information to this Commission, these many same measurements are  
22 reported by BellSouth quarterly as required by the Florida PSC Service  
23 Rules and by FPSC Service Evaluations.

24

25



1 Q. ON PAGE 18 OF MR. PFAU'S TESTIMONY, HE STATES THAT  
2 "MEASURES ORIENTED TOWARD A PERCENTAGE OF CASES  
3 EXCEEDING A TARGET DO NOT ALLOW MONITORING FOR  
4 NONDISCRIMINATION BECAUSE THE MEASURE TRACKS ONLY THE  
5 FREQUENCY THAT A POTENTIALLY ARBITRARY THRESHOLD IS  
6 EXCEEDED...". IS THIS TRUE?

7  
8 A. Yes. This is true if the thresholds are arbitrary. However, the AT&T-  
9 BellSouth contract recognizes that the thresholds used for percentage  
10 measurements, such as percent due dates met, are not arbitrary, but are  
11 based on a specific commitment to the end user of the service. It is obtained  
12 from the same system BellSouth uses to establish commitments to its retail  
13 end users. Since the specific thresholds (the due dates established for  
14 individual services) come from the same source, the percent measurement  
15 is an excellent demonstration of parity.

16  
17 **REBUTTAL OF MR. KINKOPH'S TESTIMONY**

18  
19 Q. MR. KINKOPH STATES THAT THE FLORIDA PUBLIC SERVICE  
20 COMMISSION SHOULD TAKE A ROLE IN APPROVING PERFORMANCE  
21 STANDARDS. DO YOU AGREE?

22  
23 A. Yes. However, I believe the appropriate approach is a set of standards  
24 negotiated between the parties involved and approved by the Commission,  
25 rather than an arbitrary set of standards and benchmarks established by

1 ALECs. Mr. Kinkoph may believe that the standards set forth in my  
2 testimony are only a subset of the standards he deems essential, but they  
3 are the standards agreed to by the largest member of FCCA and the LCUG  
4 -- AT&T.

5  
6 The FCC has declined to create a set of national standards for either OSS  
7 access or performance, implicitly deferring this authority to the state  
8 commissions. Until such time as the FCC changes its position, any national  
9 standards such as those advocated by LCUG should not be considered by  
10 the Florida Commission.

11

12 **Rebuttal of Mr. Hamman's testimony (AT&T)**

13

14 Q. ON PAGE 13 OF MR. HAMMAN'S TESTIMONY HE REFERS TO THE  
15 AT&T - BELL SOUTH AGREEMENT ON PERFORMANCE  
16 MEASUREMENTS AS "INTERIM MEASUREMENTS." IS THIS CORRECT?

17

18 A. No. This is completely inaccurate and misleading to this Commission. In  
19 this agreement between AT&T and BellSouth, which was Exhibit WNS-A to  
20 my Direct Testimony, BellSouth commits to provide the same level of service  
21 to AT&T that BellSouth provides to its retail operations. As this Commission  
22 is aware, many Service Measurements are already reported by local  
23 exchange providers to this Commission, so permanent measurements  
24 already exist. It would appear that Mr. Hamman does not fully understand  
25 the negotiations that took place between his company and BellSouth.

1

2 **Rebuttal to Ms. Strow's Testimony (ICI)**

3

4 Q. ON PAGE 50 AND 51 OF HER TESTIMONY, MS. STROW DISCUSSES  
5 AND INTRODUCES AS AN EXHIBIT THE PERFORMANCE STANDARDS  
6 PROPOSED BY THE LOCAL CARRIERS USERS GROUP ("LCUG").  
7 WHAT IS BELL SOUTH'S POSITION?

8

9 A. As discussed in my rebuttal to Mr. Kinkoph's testimony, the performance  
10 standards negotiated between AT&T and BellSouth are ready to implement  
11 now. The restart of the process, which Ms. Strow suggests and would take  
12 up to a year, is completely unnecessary. Also, Ms. Strow suggests the need  
13 for standards for data services in addition to those service categories  
14 already listed in BellSouth's proposal. As I have discussed several other  
15 places in this testimony, the ultimate test for whether a service is performing  
16 as required is the end users' acceptance of that service. The proposed  
17 measures include the end users' initial acceptance of the service (Due Date  
18 Met), measures of their initial use of the service (Trouble reports within 30  
19 days of installation), and any problems with ongoing use of the service  
20 (Report Rate, Average Duration of Troubles, and Repeated reports within 30  
21 days). These measures are applicable regardless of the type of service  
22 being measured. Since the end users control these reports, and they are  
23 the ultimate users of the service, these reports are adequate for each type of  
24 service, including data services.

25

1 **Rebuttal to Ms. Closz (Sprint)**

2

3 Q. ON PAGES 19 AND 20 OF HER TESTIMONY, MS. CLOSZ DISCUSSES  
4 THE IMPLEMENTATION SCHEDULE OF AGREED UPON  
5 PERFORMANCE MEASURES. DO YOU HAVE ANY COMMENT?

6

7 A. Yes. BellSouth has informed all ALECs with whom we have signed  
8 agreements that the initial reporting of performance results will begin in  
9 September, 1997, to reflect August, 1997, data.

10

11 **Rebuttal to Mr. McCausland (Worldcom)**

12

13 Q. ON PAGES 22 AND 23 OF HIS TESTIMONY, MR. MCCAUSLAND  
14 MENTIONS SEVERAL "OBVIOUS EXAMPLES" OF MEASUREMENT DATA  
15 HE BELIEVES ARE NEEDED. ARE THESE MEASURES INCLUDED IN  
16 BELL SOUTH'S CURRENT PROPOSAL?

17

18 A. Yes. Each of these measurements is included in an existing measure  
19 proposed by BellSouth, although the metric proposed for capturing the data  
20 may not be exactly the same as that suggested by Mr. McCausland.

21

22 First, Mr. McCausland suggests that an appropriate measure would be to  
23 compare the average time to install unbundled loops for Worldcom with the  
24 average time BellSouth uses to provide loops to its own customers. While on  
25 the surface this might seem to be a proper comparison, I'd like to examine

1 his proposal in more detail and highlight the problems with the proposed  
2 measurement.

3

4 When BellSouth provides a service using a loop to one of its customers, it  
5 utilizes systems and processes that have been developed over a long period  
6 of time. These systems and processes assign and coordinate the  
7 connection of the loop to the equipment required in the serving wire center,  
8 test the service, and turn it over to the end user for service.

9

10 When a similar service is provided to a Worldcom end user using a  
11 BellSouth unbundled loop, there are a significant number of differences in  
12 the process. At this time, BellSouth is providing only a portion of the total  
13 service - the unbundled loop. The process of coordinating the installation of  
14 the entire service, assigning, configuring, and connecting the equipment in  
15 the serving office to the loop, and testing the service before turning it up to  
16 the end user are now Worldcom's responsibility. BellSouth's commitment is  
17 to provide an unbundled network element (the unbundled loop in this case)  
18 on the agreed to due date to Worldcom, so Worldcom can provide service to  
19 their end user. The appropriate measure of BellSouth's performance in this  
20 case is the measure of Percent Due Dates Met for unbundled elements.  
21 This measure is contained in BellSouth's proposal.

22

23 Second, Mr. McCausland states that BellSouth should provide the mean  
24 time to repair (MTTR) for ALECs compared to the same time BellSouth  
25 repairs its retail customer trouble reports. The MTTR measurement

1 described by Mr. McCausland already exists. In BellSouth's proposal it is  
2 the average duration measurement in the repair category. He apparently  
3 misread this part of BellSouth's proposal.

4  
5 Third, Mr. McCausland states that BellSouth must measure cycle time for  
6 ALECs and itself. The cycle time measurement comparison described by  
7 Mr. McCausland is captured by the Percent Due Date met measurement in  
8 combination with the ALEC's access to BellSouth's due date processor as I  
9 described in my rebuttal to Mr. Pfau's testimony above.

10

11 Finally, as I also described earlier, BellSouth is preparing an availability  
12 measure for the ALEC interface systems, similar to that described by Mr.  
13 McCausland.

14

15 **Rebuttal of Mr. Hoffman's Statement**

16

17 Q. DO YOU AGREE WITH MR. HOFFMAN'S STATEMENT THAT THE  
18 PERFORMANCE REPORTS PROVIDED BY BELL SOUTH FAIL TO  
19 PROVIDE SUFFICIENT INFORMATION FOR THIS COMMISSION TO  
20 DETERMINE WHETHER SERVICE PARITY IS BEING PROVIDED?

21

22 A. Absolutely not. As I have established in both my direct testimony and in my  
23 responses herein to other testimony in this docket, the performance  
24 measures embodied in the agreement between BellSouth and AT&T as well

25

1 as other performance results regularly submitted to the FPSC and the FCC  
2 are more than adequate to monitor service parity concerns.

3

4 Q. ON PAGE 4 OF HIS ANSWER TO THE PETITION OF BELL SOUTH, MR.  
5 HOFFMAN ALLEGES THAT BELL SOUTH IS NOT PROPERLY SIZING  
6 TRUNK GROUPS RESULTING IN BLOCKAGE OF TCG TRAFFIC. WHAT  
7 IS YOUR RESPONSE?

8

9 A. I am startled that Mr. Hoffman would make such a statement. First, the  
10 number of one-way trunk groups which deliver traffic to TCG's switch is  
11 determined solely by TCG. BellSouth will install as many as TCG wishes to  
12 order. Second, with regard to the trunks between BellSouth's switch and the  
13 tandem, these trunks carry not only TCG's traffic, but all other traffic  
14 including BellSouth's. The FPSC Service Rules in Section 25-4.071  
15 Adequacy of Service under paragraph (1) state that the call completion  
16 standard for trunked calls is 97%. BellSouth routinely completes 99% or  
17 better. The most recent Service Evaluations performed by the FPSC Staff  
18 show that BellSouth's completion rate for inter-office call completions was  
19 100%. This measurement included tests between BellSouth offices and  
20 ALEC offices. Further, in its most recent ARMIS report filed with the FCC,  
21 99.7% of BellSouth's offices exceeded the FCC reporting standard of a 98%  
22 completion rate on trunked calls. These reports clearly establish that  
23 BellSouth inter-office and tandem facilities are properly sized to meet and  
24 exceed regulatory and company standards.

25

1 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

2 A. Yes.

3

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1 BY MR. RANKIN:

2 Q Mr. Stacy, have you prepared a summary of your  
3 testimony for us?

4 A Yes, I have.

5 Q Would you please give it at this time?

6 A Yes, I will.

7 Good evening, Commissioners. I am here to  
8 discuss specific service performance measures that BellSouth  
9 has proposed in the statement of generally available terms  
10 and conditions, and several items related to those measures.

11 I will be talking about specifically five groups  
12 of related items. The first group is the performance  
13 measures that are proposed in the SGAT, and a comparison of  
14 those measures for the ALECs with the measures BellSouth  
15 uses today for its own retail units and those end users.

16 Secondly, I will be talking about the agreement  
17 AT&T and BellSouth have reached and have filed with this  
18 Commission regarding a similar set of proposed measures that  
19 includes measures for provisioning maintenance billing data  
20 bases and account maintenance.

21 Thirdly, I will be talking about the kinds of  
22 services, groups of services that those measures propose to  
23 measure, and the kinds of measurements to be applied to  
24 those services. Then we will be talking a little bit about  
25 the process that BellSouth has proposed to establish target

1 levels for those measurements, which is a process called a  
2 statistical process control, where BellSouth provides a  
3 similar service to itself and the statistical process  
4 control combined with target intervals for services that  
5 BellSouth does not provide to itself.

6           And then, finally, I will be talking about the  
7 existing measures, processes, and organizations that  
8 BellSouth has in place to ensure parity of service for the  
9 ALECs, and the fact that parity of service is being provided  
10 today.

11           First, let me briefly remind you of the groups of  
12 services that were discussed in my prefiled testimony.  
13 There is one group of services that are called POT services,  
14 plain ordinary telephone services delivered to residence  
15 customers where providing or maintaining the services  
16 requires that a technician be dispatched. And we will refer  
17 to that during the testimony as POTS residence dispatch out.

18           There is another group of the same customers  
19 where the service does not require the dispatch of  
20 technicians, and those are called POTS residence nondispatch  
21 out. There are exactly the same two groups for business  
22 customers; those that require dispatch and those that don't  
23 require a dispatch. There are the same two groups for  
24 unbundled network elements; those that require a dispatch  
25 and those that don't require a dispatch. There is a group

1 for local interconnection trunking and a set of measurements  
2 for that, and there is a final and eighth group called  
3 design special services, which is a different category of  
4 services.

5           There are in all eight measures applied to  
6 determine whether BellSouth is provisioning and maintaining  
7 those services in a nondiscriminatory matter. The first one  
8 is notification of errors and how many errors are caused in  
9 the systems. How fast firm order confirmations are  
10 provided. What percentage of appointments are met so we can  
11 compare directly the appointments met for BellSouth end  
12 users that are retail customers and CLEC users receiving a  
13 resold service. And the percent trouble reports that those  
14 new users report within 30 days of their service change.

15           In addition to those measurements on maintenance,  
16 there are measures for the average duration in hours of a  
17 service outage, the percentage of appointments that were met  
18 when we promised a customer for an ALEC or for BST that we  
19 would be there to perform maintenance on the service we had  
20 sold them. The number of repeated reports that occur if we  
21 didn't fix the trouble the first time, and the report rate.  
22 If you have 100 lines in service, whether you were a CLEC or  
23 BST, how many troubles would you experience in a normal  
24 month, because those numbers ought to be similar.

25           Finally, there is a measure for percent calls

1 answered in 30 seconds in BellSouth's repair center, which  
2 is a specific measurement for AT&T. There are in addition  
3 to that, and I will not discuss them all in detail, there  
4 are 13 other measurements that cover billing, data bases,  
5 and account maintenance, and deal with timeliness and  
6 quality of the CLEC's -- ALEC's, I'm sorry, access to those  
7 data bases.

8           Next, let me briefly describe the process that I  
9 mentioned earlier called statistical process control.  
10 Briefly, this involves taking BellSouth's actual monthly  
11 performance in a given category and using that performance  
12 over time to establish three statistical control parameters.  
13 And the fancy names for those are the average, the upper  
14 control limit, and the lower control limit.

15           Those parameters are recalculated each month  
16 based on BellSouth's history and BellSouth's ability to  
17 provide that service to its own end users, because as you  
18 know, our ability to meet due dates varies over time. It is  
19 certainly worse after a hurricane, it is certainly better in  
20 the middle of the summer. No hurricane assumed there.

21           So when these calculations are done, you will see  
22 a graph, and there is one of those attached as an exhibit as  
23 an example, that shows BellSouth's performance over time in  
24 one of those areas. Once that has been done, our  
25 performance for the CLECs for the same kinds of services is

1 plotted on top of the same graph and lends to an easy  
2 comparison.

3           The statistical process control measurement says  
4 that if the same process is being used to provide both  
5 services, then the results for both services should be  
6 within the upper and lower control limits. If they deviate  
7 from that, there is reason to investigate and then correct  
8 the process. So that technique allows for what we believe  
9 is simple direct comparison of the results, using standard  
10 statistical techniques.

11           Next, I had testified in my direct testimony that  
12 a series of tests to compare OSS response times had already  
13 begun. I met on June 26th with Department of Justice  
14 representatives and determined from their comments that the  
15 method we were using to collect that data was not  
16 appropriate in their view, and so we went back and revised  
17 the process for collecting that data. The initial results  
18 of that work are complete and they have been made available  
19 as Late-filed Exhibit 1 in the late-filed exhibits to my  
20 deposition.

21           Those results clearly indicate that the  
22 response time for LENS access to the preordering operating  
23 support systems is the same -- substantially the same time  
24 as the results for RNS that were provided earlier as part of  
25 my direct testimony.

1           Finally, as the Commission knows, establishing  
2           adequate service performance measurements to ensure that all  
3           telecommunications users in Florida receive high quality  
4           service is important. And it's important regardless of  
5           whether that service is provided by BellSouth, whether it's  
6           provided by a CLEC, or an ALEC reselling BellSouth services,  
7           whether it's provided by an ALEC using unbundled network  
8           elements from BellSouth to supplement their own facilities,  
9           or whether it's provided by an ALEC using entirely their own  
10          facilities.

11           The quality of service for the end user, the  
12          customer, should be similar when similar services are  
13          provided and similar measures should be applied to each of  
14          the local exchange carriers providing service, whether  
15          BellSouth or an ALEC.

16           The Commission in the past has recognized certain  
17          measures and methods for ensuring that that goal of high  
18          quality service is met, and we believe that a similar set of  
19          measures and methods continues to be appropriate for both  
20          BellSouth and the ALECs.

21           You will hear our opponents suggest that the  
22          proposed measures described are just a starting point, and I  
23          agree with that. Our proposed statement of generally  
24          acceptable terms and conditions and our agreement with AT&T  
25          explicitly recognize that this is an evolving, changing

1 industry and that our performance measurements will evolve  
2 and change as the industry changes. And, in fact, in the  
3 agreement quarterly meetings are established as part of the  
4 process, because we believe that measures will change, new  
5 measures will be added, and old measures will be dropped as  
6 the process evolves.

7           However, BellSouth and AT&T, who is potentially  
8 one of the largest ALECs in Florida, reached agreement that  
9 these measurements were the place to start. I'm here today  
10 to request that you approve these measures as part of the  
11 SGAT so that we continue the process of creating,  
12 discarding, or changing measures to verify that both  
13 BellSouth and the ALECs are providing high quality service  
14 for both business and residence telecommunications customers  
15 in Florida. Thank you.

16           Q       Does that complete your summary?

17           A       Yes, sir.

18           MR. RANKIN: Bellsouth tenders the witness,  
19 Chairman Johnson.

20           MS. BARONE: And, Madam Chairman, if I might ask  
21 for an exhibit identification at this time, WNS-G, which  
22 consists of Mr. Stacy's deposition transcript and his  
23 late-filed deposition exhibits and confidential late-filed  
24 deposition exhibits.

25           Madam Chairman, staff requests that this document

1 be identified as Exhibit Number 52.

2 CHAIRMAN JOHNSON: It will be identified as 52.  
3 (Exhibit Number 52 marked for identification.)

4 CHAIRMAN JOHNSON: Ms. Kaufman.

5 MS. WILSON: Good afternoon, Mr. Stacy. I'm  
6 Laura Wilson, I represent the Florida Cable  
7 Telecommunications Association.

8 THE WITNESS: Good evening.

9 CROSS EXAMINATION

10 BY MS. WILSON:

11 Q I would like to begin by referring you to Exhibit  
12 WNS-A that is attached to your direct testimony.

13 A Yes.

14 Q Do you have that?

15 A Yes.

16 Q Okay. And this document sets out performance  
17 measurements between BellSouth and AT&T, is that correct?

18 A That's correct.

19 Q And to your knowledge, AT&T is a reseller, is  
20 that correct?

21 A To my knowledge, AT&T has both a resale and  
22 facilities-based contract with us, although they are  
23 operating only as a reseller.

24 Q Okay. To your knowledge, has BellSouth executed  
25 an agreement for performance standards with any operational



1 facilities-based ALEC in Florida?

2 A To my knowledge, we have completed one such  
3 agreement yesterday, in fact.

4 Q Okay. Have you executed such an agreement for  
5 Media One?

6 A We have not.

7 Q And have you executed such an agreement for  
8 Comcast?

9 A We have not.

10 Q And you have not executed such an agreement for  
11 Time Warner, have you?

12 A We executed the agreement for Time Warner  
13 supposedly this morning. I do not have a signed copy with  
14 me.

15 Q Okay. All right. And I would like to refer to  
16 you Pages 4 and 5 of WNS-A, and Section 2.4 there on the  
17 bottom of Page 4 regarding firm order confirmation?

18 A Yes.

19 Q Does this firm order confirmation language apply  
20 to both access service requests and to local service  
21 requests?

22 A This firm order confirmation measurement applies  
23 in this case to local service requests. We have extended  
24 that in the agreement with Time Warner to include access  
25 service requests.

1 Q Okay. And in general walking around terms,  
2 facilities verification is when the BellSouth people check  
3 whether there are adequate facilities available in the  
4 serving central office before issuing a firm order  
5 confirmation, is that correct?

6 A In general terms, that is correct. Normally, the  
7 BellSouth people do that using a data base system, it's not  
8 a physical verification.

9 Q Okay. And on resold services, BellSouth  
10 automatically performs a facilities check before committing  
11 to a due date on a firm order confirmation, doesn't it?

12 A BellSouth does not on resold services, whether  
13 those services are resold for BellSouth's own retail units  
14 or to an ALEC. The facility check, the facilities are  
15 assumed to be available and the actual check is made  
16 downstream.

17 Q Do you recall being asked that question in your  
18 deposition?

19 A I do not recall that specific one in my  
20 deposition.

21 Q Okay. I would refer you -- do you have your  
22 deposition in front of you?

23 A Yes.

24 Q -- to Page 139, beginning at Line 11 through 20.  
25 And I will just read that to you. And I asked you the

1 question at Line 11, "So do you typically include a  
2 facilities verification with every firm order confirmation?"  
3 And the answer was, "It actually depends on the class of  
4 order, but not with every firm order confirmation, no."

5 And I asked, "Do you provide a due date before  
6 you complete the facilities verification that you just  
7 described?" And you answered, "On a resold service there is  
8 an automatic check of the facilities, and we do provide a  
9 firm order confirmation if that automatic check comes back  
10 positive and says the facilities are available."

11 Do you recall that now?

12 A Yes, I remember that, and all I can say is that I  
13 misspoke at that time, because the firm order confirmation  
14 on a resold service is done after the automatic check comes  
15 back.

16 Q The firm order confirmation -- I understood you  
17 to say that the firm order confirmation --

18 A Maybe I ought to describe the process.

19 Q Well, just one question first. I understood you  
20 to say that the firm order confirmation comes back after the  
21 automatic facilities check on a resold service?

22 A No. On a resold service -- let me describe the  
23 process and that may make it clearer, because we were in the  
24 middle of a set of questions in my deposition. On a resold  
25 service, just as it occurs on a BellSouth retail service,

1 there is a presumption that if the address validates  
2 properly, and that is the check that is applied, that  
3 facilities are available. And I'm talking about the normal  
4 classes of simple resold services. It does not apply to the  
5 complex services. That is a different process. So there is  
6 a presumption that facilities are available.

7           When the firm order confirmation is returned on a  
8 resold service, that presumption is just that, because we  
9 maintain facilities to each location. If there is a data  
10 base error during the further processing of the order, there  
11 could be conditions where facilities are not available. So  
12 the sequence is send the order, that order is validated  
13 through the process that Ms. Calhoun has described, once the  
14 order is validated, all of the codes on the order are right,  
15 the things that are needed to be ordered are right, it is  
16 entered into the service order control system and the  
17 service order control system generates a firm order  
18 confirmation. A facilities check has not been done at that  
19 point in time for a resold service.

20           Q       Okay. Let's take another example. If I'm a  
21 facilities-based ALEC ordering an unbundled loop, BellSouth  
22 would set a due date without a facilities verification, is  
23 that correct?

24           A       If you are a facilities-based provider ordering  
25 an unbundled loop, there are two cases. The first case is

1 where you are unbundling a loop that belongs to an existing  
2 BellSouth retail customer. In that case, no facilities  
3 check is made because there is a facility available. If you  
4 are ordering a new one bundled loop to a location that does  
5 not currently have service, that is a designed service and a  
6 facilities check is made. So there are multiple cases under  
7 your question.

8 Q Could I have just a minute? Do you recall us  
9 discussing that particular point in your deposition, as  
10 well?

11 A We discussed it. Yes, I do recall that we  
12 discussed the whole issue, and I'm trying to clarify some of  
13 the things in my deposition. We wandered off down several  
14 paths, but I don't believe I misspoke that one.

15 Q Okay. I would like to refer you to Page 140 of  
16 your deposition at Line 18. Do you have that in front of  
17 you? Where you state, "We do not have the same ability at  
18 this time for an unbundled loop, because there are types of  
19 network elements -- well, the unbundled loop network  
20 elements --" and then you went into an example, but the  
21 answer was that you don't have the ability at this time for  
22 a facilities verification on an unbundled loop, isn't that  
23 correct?

24 A Just a moment, I need to figure out where we were  
25 in the conversation.

1 Q Okay.

2 A The reference there is to an automatic  
3 verification of whether facilities are available. And in  
4 the second case that I described to you, a new unbundled  
5 loop, that verification is made, but it's not automatic. We  
6 were talking about automatic verification at that point in  
7 the deposition.

8 Q Okay. But a facilities-based -- a facilities  
9 verification is not typically performed before a firm order  
10 confirmation is given, isn't that correct?

11 A On a resold service, that is correct. On an  
12 unbundle network element, it is or is not performed  
13 depending on the two classes we are discussing.

14 Q Okay. If a facilities verification is not  
15 conducted, what assurances do I have, as an ALEC, that  
16 BellSouth will meet the due date in my firm order  
17 confirmation?

18 A If it is not -- if it is not performed, the  
19 assurances you have are similar to the assurances that the  
20 network group gives the existing BellSouth retail units,  
21 that we have every reason to believe that we have  
22 provisioned sufficient facilities to each location to meet  
23 normal demand, and that we miss very few of those orders,  
24 very few placed orders, whether it's from an ALEC or  
25 BellSouth because of that. But it is not a positive check

1 until a facility verification is done.

2 Q So, essentially I have a promise to use best  
3 efforts, is that correct?

4 A Yes.

5 Q And BellSouth currently provides firm order  
6 confirmation to its own IXC customers, is that correct?

7 A To its own -- I'm sorry.

8 Q To its own IXC customers?

9 A Yes, it does.

10 Q Okay. And how long does it typically take a  
11 BellSouth IXC customer to get a firm order confirmation once  
12 it is submitted, once an order is submitted?

13 A I will split those into two or three classes,  
14 because there are very different answers. On an access  
15 service request that involves trunks, the typical response  
16 time is five days. On a simple loop service, that is just a  
17 telephone numbered service, the typical response time is  
18 less than 24 hours. And the responses for more complex  
19 services at the DS-1/DS-3 level varies somewhere between  
20 those two time intervals. So more than a day typically, but  
21 less than five days depending on the complexity.

22 Q Okay. And BellSouth conducts a facilities  
23 verification when providing a design layout record for its  
24 IXC customers, isn't that correct?

25 A That's correct.

1 Q Okay. And that facilities verification on a DLR  
2 for an IXC typically consists of a combination of a  
3 facilities verification and a physical verification, isn't  
4 that correct?

5 A No, that's not correct. That typically consists  
6 only of a data base verification.

7 Q And that's not how you answered that question in  
8 your deposition, though, is it, Mr. Stacy?

9 A If I answered it different in the deposition, I  
10 misspoke. But I have been back through all of this,  
11 including my deposition, since we asked those questions to  
12 make sure that I understood the process exactly.

13 Q Okay. Are you aware of any problems BellSouth is  
14 experiencing in Miami with respect to the accuracy of the  
15 systems verification process?

16 A I am not aware of any problems that BellSouth is  
17 experiencing in Miami, no.

18 Q Isn't it true that when an emergency happens,  
19 such as a hurricane, that emergency repairs are made, but  
20 BellSouth's records are not always properly updated to  
21 reflect facilities changes?

22 A That is true. And that would reflect in  
23 identical ways on BellSouth's retail customers and  
24 BellSouth's ALEC customers.

25 Q Isn't it true that once BellSouth's records are



1 corrupted until there is some reason to go in and correct  
2 the records, such as a facilities verification, the records  
3 will remain incorrect?

4 A That is not completely true. There are periodic  
5 audits of the facilities that correct the records when  
6 things like that happen. But, your statement is partially  
7 true.

8 Q And how often are those audits performed?

9 A It depends on the activity in the particular  
10 section of territory. To my knowledge, there is no  
11 particular period that the audits are performed, it's when  
12 sufficient data base errors have been detected that we  
13 believe it's required.

14 Q So it could be five years?

15 A It could be five years, it could be five weeks.

16 Q Okay. So it's true, then, after an emergency  
17 like a hurricane, BellSouth can take months or even years  
18 updating its records?

19 A Yes, that's true equally for the retail customers  
20 and the ALEC customers.

21 Q Okay. I would like to refer you now to Exhibit  
22 WNS-D, at Page 3 of 3.

23 A All right.

24 Q I would like to talk to you about performance  
25 measures BellSouth offers for interim number portability or

1 remote call forwarding.

2 A Yes.

3 Q BellSouth is not willing to measure interim  
4 number portability cut over duration, is that correct?

5 A That's correct.

6 Q Okay. And BellSouth is not willing to measure  
7 interim number portability time to restore, is that correct?

8 A That's not -- define time to restore for me, I'm  
9 sorry.

10 Q Time to restore from a reported trouble?

11 A No, that's not correct. That measurement is  
12 included in the unbundled network elements not requiring a  
13 dispatch average time -- average outage time. That is the  
14 reason that whole category was established, was to measure  
15 the software-based unbundled network element services.

16 Q Okay. What has caused you to change your  
17 response from your deposition on this question, as well?

18 A I have not intentionally changed my response,  
19 unless I misunderstood your question just then.

20 Q Okay. Does BellSouth plan to measure the interim  
21 number portability service failure rate?

22 A Yes, that is in the category called unbundled  
23 network elements not requiring a dispatch.

24 Q Okay. And on Exhibit WNS-D, at Page 3 of 3, you  
25 state for number portability, a provisioning interval of two

1 to three days, is that correct?

2 A Depending on the number of loops or the number of  
3 -- numbers two to three, yes.

4 Q Okay. If these provisioning intervals conflict  
5 with the interim number portability intervals that are  
6 contained in an interconnection agreement, which interval  
7 would BellSouth comply with?

8 A The contracts over -- the interconnection  
9 agreements override these general intervals.

10 MS. WILSON: Okay. I don't have any further  
11 questions.

12 CHAIRMAN JOHNSON: Mr. Willingham.

13 MR. WILLIS: Mr. Stacy, my name is Bill  
14 Willingham. I'm here on behalf of Teleport. I just have a  
15 few questions for you.

16 THE WITNESS: All right.

17 CROSS EXAMINATION

18 BY MR. WILLINGHAM:

19 Q Do you still have your deposition transcript  
20 handy?

21 A Yes.

22 Q If you could turn to Page 99 for me, please.

23 A 99?

24 Q 99, yes. And if you could look at Line 8.

25 Actually, if you could read Lines 8 through 11 to yourself

1 real quickly, or take your time actually.

2 A All right.

3 Q I just want to clarify one thing. You responded  
4 that BellSouth provides two levels of interconnection with  
5 its own network, and you talked about the end office and the  
6 tandem trunking. Is the tandem that you are referring to an  
7 access tandem or a local tandem?

8 A It is actually available from both the access and  
9 the local tandem, so you can call that three levels or you  
10 can call it two levels. Interconnection is available at  
11 three points, two of the points are called tandems.

12 Q Okay. Does BellSouth typically design the  
13 network to route its local traffic through an access tandem?

14 A BellSouth typically designs its network in two  
15 layers; it designs the local portion of the network to route  
16 on end office to end office trunks and through local  
17 tandems, and it designs the access portion of its network to  
18 route through the access tandems to the interexchange  
19 carriers.

20 Q Thanks. That's all I have on your deposition  
21 transcript. If you could turn to your Late-filed Number 6,  
22 which is proprietary, and I would ask that you do not  
23 mention any of the numbers or specific information  
24 containing in here. I just have a few generic questions for  
25 you.

1 A Okay. Number 6, you said, I'm sorry?

2 Q Yes, Late-filed Exhibit Number 6. And it's  
3 actually the -- if you could look at the first page of the  
4 attachment to your exhibit.

5 A All right. Let me make sure what we are  
6 describing, because I apparently do not have a separator  
7 page in here. This exhibit began with a cover sheet that  
8 says jointly provisioned independent trunk groups in the  
9 Orlando area. My separator page is not in the right place,  
10 I think.

11 Q Okay. Actually, I can give you my copy, because  
12 they are all essentially the same.

13 A I can't tell where 5 stops.

14 MS. BARONE: Commissioners, we want to hand out  
15 the confidential package in case you need that to follow  
16 along. And which page, again, are you referring to, Mr.  
17 Willingham?

18 MR. WILLINGHAM: It would be the first page of  
19 the attachment that's on Late-filed Exhibit Number 6. The  
20 title begins Teleport Communications Group, TCG. I think  
21 it's South Florida --

22 THE WITNESS: I had it. I was missing the  
23 separator page.

24 MR. WILLINGHAM: Okay.

25 COMMISSIONER GARCIA: What is the exhibit?

1 MR. WILLINGHAM: It's Deposition Exhibit 6, and  
2 it's the attachment to there.

3 MS. BARONE: Commissioner Garcia, if you would  
4 look at WNS-CON contained in your packet.

5 MR. WILLINGHAM: Is everybody there? It really  
6 won't matter, but if you would just go to the attachment,  
7 just look at the first page.

8 BY MR. WILLINGHAM:

9 Q There are some terms on here that I don't  
10 understand, I'm not familiar with. The first one is the  
11 acronym OFFD, do you see that? It's one of the column  
12 headings.

13 A Oh, I'm sorry, yes.

14 Q What does that stand for?

15 A It stands for the word offered. It is an  
16 abbreviation for the amount of 100 call second units of  
17 traffic offered to that particular trunk group.

18 Q Okay. Does that represent the absolute number of  
19 calls carried over that trunk group?

20 A That represents the best estimate that  
21 BellSouth's traffic engineering groups can obtain of the  
22 maximum load offered to that particular trunk group. This  
23 study is a statistical study that's done during the busiest  
24 hour of the average day, and that's where that number comes  
25 from.

1 Q Okay. So that is an estimated number as opposed  
2 to an actual number, correct?

3 A No, I'm sorry, I said that wrong. That is data  
4 collected in a particular hour, it's not an estimated  
5 number. It is actual data collected on that trunk group.  
6 In that particular case, on that first line, it's data  
7 collected on August the 4th.

8 Q Be careful, please.

9 A I won't. On August the 4th at 2100, in the hour  
10 beginning at 9:00 o'clock in the evening and going until  
11 10:00 o'clock in the evening. The offered data is the  
12 number of 100 call seconds during that hour on August the  
13 4th.

14 Q All right. That's call seconds as opposed to  
15 number of calls?

16 A 100 call seconds. That's a normal traffic  
17 measurement of not only the number of calls, but how long  
18 they lasted.

19 Q Okay. So it's not a pure function of the number  
20 of calls?

21 A No, it's a function of both the number of calls  
22 and their duration.

23 Q Okay. Just to clarify, this does not tell us the  
24 actual number of calls that were placed over that trunk  
25 group in the given hour, is that correct?

1           A       No, it does not. That's not how traffic  
2 engineering is done. It's done on total volume offered to  
3 that trunk group in the hour.

4           Q       Okay, thank you. On this same page, does this  
5 exhibit provide the size of the trunk group that is at issue  
6 anywhere?

7           A       Yes, it does. In the in-service column to the  
8 left, that's the physical number of DS-0 circuits in the  
9 group.

10          Q       This exhibit does not show the actual number of  
11 calls that were blocked over that trunk group in the hour  
12 stated on the report, does it?

13          A       No, it shows the percentage blocking.

14          Q       Okay. When you say percentage, what percentage  
15 are you talking about?

16          A       The column that's labelled BLKG, blocking, is  
17 representative of the percentage of calls offered to the  
18 trunk group during that hour that were blocked.

19          Q       So that percentage would be the number of calls  
20 blocked over the number of calls offered?

21          A       It would be the number of calls blocked over the  
22 total number of calls offered, yes.

23          Q       Okay. And the total number of calls offered  
24 would include those blocked plus those that actually got  
25 through?



1           A       Yes.

2           MR. WILLINGHAM: Thank you. I have no further  
3 questions.

4           COMMISSIONER DEASON: Let me ask a question.  
5 What is considered an acceptable blockage rate?

6           THE WITNESS: The trunk groups are designed for  
7 blockage rates of a half of one percent, one percent, or in  
8 some cases, two percent. When they exceed those blockage  
9 rates, additional trunks are added to the groups. If the  
10 traffic being offered to a group changes very suddenly from  
11 one day to another or from one week to another, the response  
12 time to add additional trunks -- and I will call it catch up  
13 -- with the demand for traffic on the group requires in the  
14 case of a trunk addition, 30 to 60 days.

15           So the process of doing that is to cooperate with  
16 the ALEC or with the independent company and to stay ahead,  
17 obtaining what we call a good trunk forecast where the data  
18 that is required to determine how many trunks are needed is  
19 available on 60 or 90 days in advance so that central office  
20 equipment can be ordered, facilities can be provided, and  
21 new trunks established.

22           COMMISSIONER DEASON: Under this report, and I'm  
23 not going to use any number off the report, but just  
24 hypothetically if there were a number under this designation  
25 that was .1000, what does that mean in terms of blockage

1 rate?

2 THE WITNESS: That would represent a 10 percent  
3 blockage rate.

4 COMMISSIONER DEASON: And over to the left, in  
5 the column REQ, what does that stand for?

6 THE WITNESS: That is the number of trunks that  
7 this study determined would be required to handle the  
8 offered traffic. So the traffic engineers are charged with  
9 studying each trunk group weekly. And they get a series of  
10 reports, this particular report being one of them, which  
11 they used to determine whether additional trunks are needed  
12 in a group or not. And they base that judgment on all of  
13 the factors that are listed across the columns there.

14 CHAIRMAN JOHNSON: Mr. Melson.

15 MR. MELSON: Mr. Stacy, I'm Rick Melson  
16 representing MCI.

17 CROSS EXAMINATION

18 BY MR. MELSON:

19 Q Before we get started, I've got a couple of  
20 housekeeping questions for you. During your deposition we  
21 were referring to Exhibit WSN-D, and my recollection is that  
22 some of us had two pages and some of us had three, and I  
23 think in the rush of things here I'm not sure how many pages  
24 there are supposed to be in that exhibit, could you tell me?

25 A Did you say B or D?

1 Q D as in dog.

2 A There are supposed to be three pages. The first  
3 page starts with the category unbundled loops, two wire  
4 analog voice grade loop, and the third page ends with direct  
5 inward dial, initial request trunk group to be established.

6 MR. MELSON: Let me ask if Ms. White could  
7 provide me at some point a copy of that exhibit, because I  
8 still have just a two-page version.

9 MS. WHITE: Yes.

10 BY MR. MELSON:

11 Q Also, Mr. Stacy, your Late-filed Deposition  
12 Exhibit Number 10, which was a list of -- and a  
13 prioritization of changes to LENS was identified as a  
14 proprietary exhibit. Have you had a chance to review that  
15 and determine whether, in fact, BellSouth considers that  
16 information to be proprietary?

17 A Yes, and I believe that we declared that it was  
18 not a proprietary exhibit, that it had been stamped in  
19 error. If it did not get back --

20 MS. WHITE: I'm sorry, which one was this?

21 THE WITNESS: Late-filed 10.

22 MR. MELSON: The LENS updates.

23 MS. WHITE: Yes. I agree, it is not proprietary.

24 MR. MELSON: Commissioners, I'm not going to have  
25 questions about that now, I'm going to have some a little

1 later. So I may ask you to pull a couple of nonproprietary  
2 pages out of your confidential folder to work with. But I  
3 will deal with that when I get there.

4 BY MR. MELSON:

5 Q Mr. Stacy, the performance measurements that  
6 BellSouth is relying on to meet checklist compliance are  
7 essentially those measures taken from the AT&T  
8 interconnection agreement, is that correct?

9 A With one correction. The performance measures,  
10 to the best of my knowledge, are not required at any point  
11 in the checklist, they have been suggested by various  
12 parties as being a useful addition to the checklist items.  
13 But the ones we are relying on are in base those in the AT&T  
14 agreement.

15 Q All right. Would you agree with me that  
16 BellSouth has an obligation to provide access to elements on  
17 a nondiscriminatory basis?

18 A Yes.

19 Q And the fact that a particular performance  
20 measurement may have been negotiated between two parties is  
21 not a necessary indication that it measures  
22 nondiscriminatory performance, would you agree with that?

23 A That is correct.

24 Q And would you agree that in order to measure  
25 nondiscriminatory performance, you ought to have measures

1 that compare where there are analogs that compare  
2 BellSouth's internal performance to its performance  
3 vis-a-vis the ALECs?

4 A Yes, and that's what we believe we have proposed  
5 in the set.

6 Q I'm going to ask you about a series of  
7 performance measurements and simply ask are they things that  
8 are included in the AT&T agreement and that BellSouth  
9 proposes to be included in the SGAT or not.

10 The first one is average installation interval  
11 for resale?

12 A That is not proposed to be included in the SGAT.

13 Q Is that something that BellSouth measures today  
14 for ALECs?

15 A BellSouth does not measure that for ALECs or for  
16 itself.

17 Q When you say or for itself, you mean it doesn't  
18 measure installation interval for retail services?

19 A For BellSouth's retail units.

20 Q All right. What about average installation  
21 interval for loops?

22 A That is not included in the SGAT, nor does  
23 BellSouth measure it for its retail units today.

24 Q And does not measure it for ALECs today?

25 A Correct.

1 Q What about percent of orders that require manual  
2 intervention, is that something that is proposed as a  
3 performance measurement?

4 A That is not proposed as a performance  
5 measurement.

6 Q Is that something that BellSouth measures today  
7 for itself?

8 A To my knowledge, BellSouth does not produce a  
9 measure of percent orders that require manual intervention.

10 Q Does BellSouth measure something called fallout  
11 to manual processing?

12 A We measure that in cases where we are  
13 establishing or changing a process, but not on a routine  
14 basis.

15 Q And is it safe to assume that BellSouth does not  
16 measure today for ALECs the percent of orders that require  
17 manual interventions?

18 A No, I'm sorry, it isn't safe because of the  
19 number of questions in the deposition and some other places  
20 I have had those measures collected. They are being  
21 produced, I believe as part of AT&T -- I have forgotten the  
22 name of the request.

23 Q An answer to one of AT&T interrogatories?

24 A In answer to one of AT&T's interrogatories. I  
25 believe Number 1. So those measures, that measure for ALECs

1 is being produced.

2 Q I skipped over one that I meant to ask. Do you  
3 measure for ALECs today average installation interval for  
4 unbundled local switching?

5 A We do not.

6 Q And you don't propose to measure it?

7 A No. All of the -- the analog for all of those  
8 measures that you have discussed where intervals are  
9 involved is the establishment of the due date and BellSouth  
10 meeting of that commitment, that's what is proposed.

11 Q Do you measure or propose to measure a percent of  
12 orders rejected?

13 A Yes, that proposal is included in the SGAT  
14 proposed.

15 Q I understood that -- well, let me ask this  
16 question. Do you propose to measure percent of numbers --  
17 excuse me, percent of orders rejected as a percentage of  
18 total offers -- orders placed? It's getting late,  
19 Commissioners. I'm sorry.

20 A We have had some continuing discussions about  
21 that. At the moment, the measurement is how quickly the  
22 rejects are sent rather than the percentage compared to the  
23 total, because we have not confirmed with AT&T what the  
24 denominator for that number is. Whether it is all orders  
25 sent or -- if the same order gets rejected three times, how

1 many times do you count it? That particular measurement  
2 question is still being resolved.

3 Q Well, let me ask this question. I understood  
4 that your performance measurement was the percent of rejects  
5 that occurred that were communicated in less than an hour.

6 A That's right.

7 Q And I guess my question is a little different.  
8 Do you intend to measure the percent of rejects as a percent  
9 of the universe of orders submitted?

10 A At the moment, the proposal is to measure the  
11 rejects sent within one hour compared to the total number of  
12 rejects sent in that time period. And the time period for  
13 measurement is a month.

14 Q Okay. So just to be clear, your proposed measure  
15 -- both the numerator and denominator are rejects?

16 A Yes. This was a timeliness measure, not an  
17 overall reject measure.

18 Q All right. You are not proposing to measure  
19 something that has got a numerator of rejects and a  
20 denominator of orders?

21 A That's correct.

22 Q Do you intend to measure something that has got a  
23 numerator of jeopardies and a denominator of total orders,  
24 what I would call percent jeopardy?

25 A No, we do not.



1 Q Do you measure or propose to measure system down  
2 time? And by that I mean, for example, we saw a real life  
3 example today of RSAG being unavailable. Do you have a  
4 measure that measures that down time?

5 A We do not have a measure of that included in the  
6 SGAT. I am developing a measure of -- where it's the  
7 inverse measure, its system availability. I am developing  
8 such a measure.

9 Q And do you propose to measure that just for  
10 BellSouth, just for the ALECs, or for both?

11 A It will be for both BellSouth and for the ALECs  
12 for selected systems where they can be directly compared.

13 Q And what is your timetable for putting that  
14 measurements into place?

15 A The first version of that measurement -- I have  
16 data, but the first version of that measurement is going to  
17 be produced later this month.

18 Q Do you measure or intend to measure the time  
19 required to provide completion notification?

20 A And I apologize, I have to look. I can never  
21 remember exactly what we agreed to on that one measure. We  
22 have not agreed to a measure to measure completion  
23 notification timeliness.

24 Q And I don't think completion notification is  
25 something we have talked about before. Can you just for the

1 record tell us what a completion notification is?

2 A Completion notification is the confirmation that  
3 is returned to an ALEC starting with the telephone call from  
4 the installer that the service has been turned up if there  
5 was an issue. But the completion notice is the electronic  
6 or manual form that is returned to the ALEC confirming that  
7 the order has been completed by BellSouth.

8 Q I would like you to turn to Page 10 of your  
9 direct testimony, and I'm going to try to step through  
10 fairly quickly a few of the performance measurements that  
11 you do propose.

12 And at Line 8 -- well, your first item is percent  
13 reject or error status notification, and if I understand  
14 correctly, the measure is number of rejects or error status  
15 sent in some interval divided by total number of rejects, is  
16 that correct?

17 A Right. And the working interval at the moment is  
18 one hour.

19 Q When is a decision going to be made on what  
20 interval you will measure on a going-forward basis?

21 A The first set of reports are being produced with  
22 an hour until a Commission or another party negotiates  
23 something different. The AT&T agreement has settled on an  
24 hour for now.

25 Q And the measurement is a percentage, what is the

1 benchmark, what is the standard that you hope to achieve?

2 A There is no standard, because we had no prior  
3 experience in this area. We are to determine in our  
4 quarterly meetings with AT&T and with the other commissions  
5 what an appropriate standard is.

6 Q You said with AT&T and the other commissions?

7 A I'm sorry, with the other ALECs.

8 Q All right. What if you are unable to come to an  
9 agreement on what the appropriate -- and I'm going to use  
10 the term benchmark to mean that, if there is a better term,  
11 I will be happy to use it. What if you are unable to come  
12 to agreement on the appropriate benchmark?

13 A Then the remedies that are enabled in the  
14 contract for AT&T in that case for failing to reach  
15 agreement would kick in and presumably at the end of that it  
16 would be arbitrated.

17 Q And what about a company that took under the  
18 SGAT, if it was unable to reach agreement on a benchmark and  
19 if you had failed to reach agreement with AT&T, is there a  
20 remedy available under the SGAT?

21 A I do not -- not being an attorney, I don't know  
22 what remedy is available to them under the SGAT.

23 Q Is the -- and I may have asked this already, but  
24 let me ask is the timeliness of rejects being measured today  
25 for ALEC resale services?

1 A Could the --

2 Q Is it being, the timeliness of rejects?

3 A The data is being collected, but I have not  
4 produced measures for that. We are to produce the first set  
5 of measures under this agreement with AT&T this month using  
6 the August data.

7 Q How long have you been collecting the data to  
8 support the measures that are listed in your direct  
9 testimony?

10 A Some of the data has been collected as far back  
11 as February, some of the data has been collected only for  
12 July and August, depending on when we got the structure of  
13 the measurement firm enough to begin collecting data.

14 Q But is it fair to say that there have been no  
15 reports produced yet based on any of that data?

16 A No, I don't think it's fair to say. The reports  
17 that I produced in my direct testimony are produced based on  
18 that same data, because we have collected all the data. The  
19 form and the groups that that data takes has not been  
20 reflected in the SGAT until the two reports I just produced,  
21 which are the June and July data where the data begins to  
22 reflect the August format.

23 The two reports I just produced are divided into  
24 the dispatched out/nondispatched out categories, and that is  
25 the first step in producing the final set of the data. But

1 the data for February through June that was produced before  
2 that is the same data, we are just looking at it through a  
3 different lens.

4 Q When you say lens in that context --

5 A L-E-N-S-E (sic), sorry.

6 Q Let's turn to what you referred to as your  
7 revised report, those were the revised exhibits WNS-E and  
8 WNS-F?

9 A Yes.

10 Q And can you show me -- I simply would like you to  
11 point to me on one of those where you have separated  
12 dispatch out versus nondispatch out data?

13 A Okay. On Exhibit F --

14 Q Yes, sir.

15 A -- the residence resale data, the two reports on  
16 Page 1 of 3 are separated into dispatched -- not dispatched  
17 out, which is the top group of data, and dispatched out  
18 which is the lower group of data on the page. Similarly, on  
19 Page 2, business resale is separated that way. And then on  
20 Page 3, the January through May data is reproduced which was  
21 not separated that way.

22 Q I believe you told me before I got side-tracked  
23 that the timeliness of rejects for ALEC resale services is  
24 not measured, is that correct?

25 A That report has not been produced yet, that's

1 correct.

2 Q Do you measure the timeliness of rejects for  
3 BellSouth's retail services?

4 A Not to my knowledge.

5 MR. MELSON: Could I have one minute. I'm  
6 looking at some of these exhibits for the first time.

7 BY MR. MELSON:

8 Q Do any of these exhibits -- none of these  
9 exhibits show the reject --

10 A That's correct, they do not.

11 Q Do you know whether BellSouth is meeting the  
12 benchmark in the MCI/BellSouth interconnection agreement  
13 which provides for 98 percent of rejects to be communicated  
14 in less than an hour?

15 A I do not know if that's being met.

16 Q Also on Page 10, Item 2, you propose to measure  
17 percent firm order confirmation per interval. Can you  
18 describe that measure in walking around terms?

19 A I'm sorry, Page 10?

20 Q Yes.

21 A Item --

22 Q Line 13 of your direct testimony.

23 A All right. Line 13 in walking around terms.

24 It's a measurement of the timeliness of BellSouth's  
25 returning a firm order confirmation to the ordering ALEC.

1 And there was an agreement that, at least to start with in  
2 September we would split the measurement into the percentage  
3 returned in four hour intervals out to 12 hours and then  
4 there were two other groups, less than 24 hours and over 24  
5 hours. So that when you totaled all of those numbers up you  
6 would find out that 100 percent of the firm order  
7 confirmations in a month had been returned, and you would  
8 know what percentage had been returned in what time  
9 interval.

10 Q All right. And that measure, if I understand  
11 correctly, applies only to orders that flow through the  
12 mechanical order generation process, is that correct?

13 A That's correct.

14 Q Is there yet a benchmark for this measure as to  
15 how many should fall in the under four hour category, et  
16 cetera?

17 A There is not a benchmark by that category, there  
18 are agreements in several of the interconnection agreements  
19 that relate to the total less than 24 or 48 hours.

20 Q I take it that the timeliness of firm order  
21 confirmations for ALECs is being measured today, is that  
22 correct?

23 A The data to measure the timeliness is being  
24 collected. Again, I have not produced the first report,  
25 that is being done right now.

1 Q Is a comparable measure made for BellSouth's  
2 retail services?

3 A No, not to my knowledge.

4 Q And would an equivalent be the time at which a  
5 BellSouth order has been accepted and flowed through all of  
6 the downstream systems?

7 A The equivalent would be the time the order has  
8 been accepted by SOCS and a firm order confirmation  
9 generated. It's just that the BellSouth retail units don't  
10 do anything with that piece of information.

11 Q And did I understand that information is  
12 collected?

13 A No, the data is not collected. The BellSouth  
14 retail units have never expressed an interest in seeing that  
15 data.

16 Q Do you know whether the performance for ALECs, in  
17 general, or for MCI, in particular, meets the 99 percent  
18 within four hours standard for electronically placed orders  
19 that is contained in the MCI/BellSouth interconnection  
20 agreement?

21 A I do not know for sure for MCI.

22 Q Do you know for ALECs generally?

23 A For ALECs generally, it does not.

24 Q Do you know whether the performance for MCI, in  
25 particular, or ALECs generally meets the 99 percent within



1 24 hours for manually placed orders?

2 A For manually placed orders, I do not know  
3 specifically for MCI. For ALECs, in general, I believe that  
4 number is about 79 percent at the moment.

5 Q Is percent order confirmation within 24 hours for  
6 manual orders something that you propose to include as a  
7 performance measurement in the SGAT?

8 A I do not propose to include manual ordering in  
9 the SGAT. That's very difficult data to track.

10 Q On Page 11 of your direct testimony, at Line 2,  
11 the measurement of percent appointments met, is there a  
12 benchmark for this measure?

13 A The benchmark for this measure is BellSouth's  
14 performance for its retail customers, which as I indicated  
15 earlier varies from month-to-month, but that becomes the  
16 benchmark.

17 Q So this is one of the benchmarks that you would  
18 define using the statistical process control methodology  
19 that you have referenced in your summary?

20 A Yes, and I shouldn't use benchmark and  
21 statistical process control in the same sentence, they are  
22 in some ways exclusive. But this is one of the measurements  
23 that we would define a comparison using the statistical  
24 process control.

25 Q And is it -- I take it this data is being

1 collected today both for ALEC services and for BellSouth  
2 retail services?

3 A Yes. And that is the data that is produced in my  
4 Exhibits E and F in various forms for both BellSouth and the  
5 ALECs.

6 Q Do you know whether this performance measurement  
7 for either MCI or ALEC residential services meets the 99  
8 percent standard contained in the MCI/BellSouth  
9 interconnection agreement?

10 A Two things; I'm not aware that there is a 99  
11 percent standard for percent appointments met in the  
12 agreement, but I do not know for MCI whether it is being  
13 met. The ALEC numbers are shown compared to BellSouth  
14 numbers in Exhibits E and F.

15 Q And where would I look to find those numbers?

16 A In Exhibit F for retail services, where there is  
17 a direct comparison. For those services that are not  
18 dispatched, reading down the left-hand side of the page,  
19 there is a darkened line that says provisioning, and then  
20 the line under that says percent due date met-POT service.  
21 Following across that line you will find the Florida ALEC  
22 results, the regional ALEC results, BellSouth in Florida,  
23 although it was not available in June, and BellSouth in the  
24 region. And then on similar lines for residence services  
25 requiring a dispatch out and business services on the

1 subsequent pages.

2 Q So for ALECs in Florida in June for residence  
3 resale, nondispatch out, you were meeting 99.7 percent of  
4 the appointments, and for dispatch out you were meeting  
5 89.2?

6 A That's correct.

7 Q Tell me first for the dispatch out situation,  
8 what do you regard as an appointment?

9 A I'm sorry, as an appointment?

10 Q Yes. You are measuring the percent of  
11 appointments met, and I guess I'm asking you what is the  
12 definition of an appointment?

13 A The percent due dates met is the measurement.  
14 The word referred to in the contract of appointments was  
15 used interchangeably with due dates at the time the language  
16 for the contract was established.

17 Q So when I read appointments in your testimony, I  
18 should equate that to due dates?

19 A I believe in every case that is the case, yes.  
20 Well, excuse me, for Measure 3 on Page 11, that is certainly  
21 true. I believe that's universal, but I will have to check  
22 as we go through.

23 Q Also on page -- strike that, I just asked that  
24 question. At the bottom of Page 11, percent trouble reports  
25 within 30 days of installation. On Page 12 in describing

1 that measure, you've got a note that says numerator and  
2 denominator are not the same order base for POTS service due  
3 to the way the measurement data is collected. Can you tell  
4 me what you mean by that?

5 A I will try to make that brief, because that is a  
6 long technical discussion, but the --

7 Q In that case, I will withdraw the question. Is  
8 there a benchmark for this measure?

9 A The benchmark of this measure, again, is  
10 BellSouth's retail -- BellSouth network's performance for  
11 BellSouth's retail units.

12 Q So this is one where you won't have a benchmark,  
13 you will do your statistical process control?

14 A And I keep interchanging the words, but they are  
15 not equivalent. Statistical process control.

16 Q What about on Page 13, percent repeat trouble  
17 reports within 30 days, is this another one where the  
18 standard will be set by a statistical process control?

19 A That's correct.

20 Q And here is the data also being collected today  
21 for ALECs?

22 A Yes.

23 Q And it is being collected for BellSouth?

24 A Yes.

25 Q Do you know whether the performance for ALECs

1 meets the less than 1 percent rate set forth in the  
2 MCI/BellSouth interconnection agreement?

3 A I'm not aware that that is the requirement in the  
4 MCI/BellSouth agreement, but to look at the actual  
5 performance on that particular measure you can again refer  
6 to Exhibit F, and that is the last column on the page where  
7 data is available. I'm sorry, not the last column on the  
8 page, the last row in the first group of data, percent  
9 trouble less than 30 days in service.

10 Q Okay. I may have lost track, I thought we were  
11 talking about repeat trouble reports, but that would be the  
12 line --

13 A I'm sorry, it's the line above that.

14 Q All right. Let me describe what I understand the  
15 statistical process control methodology to produce, and if  
16 you could tell me whether I've got it right or not.  
17 Basically, you look at historical data -- I believe you  
18 describe in your summary on the average per measure and an  
19 upper control limit and a lower control limit, is that  
20 correct?

21 A And the actual data which is used to derive those  
22 limits.

23 Q And the upper and lower control limits -- and I'm  
24 going to get statistical on you -- are each three standard  
25 deviations above and below the average?

1           A       That's correct.

2           Q       So that the range between the upper control limit  
3 and the lower control limit reflects 99.7 percent of Bell's  
4 -- of the historical data, the variations in the historical  
5 data?

6           A       Yes, it reflects approximately 99.7 percent of  
7 the variations.

8           Q       So if you fell above the upper limit or below the  
9 lower limit, that's something that you would expect to occur  
10 less than three months out of 1,000?

11          A       Yes.

12          Q       What is the historical base used to establish the  
13 average in the upper and lower control limits?

14          A       The historical base is BellSouth's performance  
15 for that measure, typically for 12 months. But in some of  
16 these cases we are not going to have that big a base because  
17 of the fact that we changed the measure from what BellSouth  
18 has historically collected.

19          Q       And is that a 12 months backwards look from the  
20 time the measure is established, or is it a rolling 12  
21 months?

22          A       I'm not clear how to answer that, I'm sorry.

23          Q       All right. On a monthly basis do you adjust the  
24 average in the upper and lower control limits based on the  
25 most recent 12-month period?

1           A        Yes.  Each month you throw out the oldest month,  
2 put in the newest month, and recalculate the limits.

3           Q        Is it fair to say that it would be possible for  
4 the performance for an ALEC to fall within that range and  
5 the performance for BellSouth to fall within that range and  
6 yet for those performances to be significantly different on  
7 a statistical basis?

8           A        On a statistical basis, it is possible for them  
9 to be different but not significantly different over time.  
10 That is the purpose of using that measurement is to provide  
11 a relatively simple comparison.  The indication that they  
12 are within the same control limits implies that the same  
13 process is being used to generate the results.

14          Q        Let me -- and maybe it will be easier to  
15 visualize if we look at one of your exhibits.  Could you  
16 turn to your Exhibit WNS-C?

17          A        Yes.

18          Q        Is this an illustration of the results of the  
19 statistical process control methodology?

20          A        That's correct, this is an illustration.

21          Q        All right.  I don't see an average on here, can  
22 we --

23          A        The average was not plotted on this one.  The  
24 average is roughly halfway between the control limit lines.

25          Q        And the limits were based on BellSouth's business

1 appointments met over --

2 A In this particular case, I think this was 24  
3 months worth of data, if I am remembering correctly.

4 Q If we had 24 months of ALEC data and if the ALEC  
5 line in each month was below the BellSouth line, but above  
6 the lower control limit --

7 A Uh-huh.

8 Q -- is it possible that could be a statistically  
9 significant difference?

10 A The definition, as I understand it, is that that  
11 is not statistically significant. But using the statistical  
12 process control theorem any three months where one set of  
13 results is below or above the other one should begin an  
14 investigation to determine what is different.

15 Q And that's the standard BellSouth intends to use  
16 for comparison, is whether for a consecutive three months  
17 period one set of performance is above or below the other?

18 A That is one of the standards. The other standard  
19 is when a result falls like it does on that example outside  
20 of the control limits.

21 Q So on this chart if April of '97 had also been  
22 above the BellSouth line, you could begin an investigation  
23 to see why you were treating ALECs too good?

24 A Generally, we are not worried about why we are  
25 treating the ALECs too good, it would be the reverse case.



1           Q       Has BellSouth -- and I know you looked with Mr.  
2 Willingham at a confidential exhibit that showed trunk  
3 blockage rate information. Does BellSouth collect that data  
4 on a routine basis for its own network?

5           A       Yes, it does.

6           Q       Does it collect that data on a routine basis for  
7 interconnection with or for blockage of calls destined for  
8 ALECs?

9           A       Yes.

10          Q       Does BellSouth propose any performance  
11 measurement based on that data?

12          A       We have not proposed it. We are trying to  
13 develop such a performance measurement. The complexity of  
14 describing the trunking network and coming up with any set  
15 of measures that is not specific to a single ALEC has far  
16 been somewhat daunting. We have a proposal that's being  
17 discussed similar to the FCC ARMIS report that shows the  
18 number of groups that exceeded a blocking threshold in a  
19 given month. But even that has proven -- the first drafts  
20 of it have proven very difficult, because it's difficult to  
21 disguise individual CLEC data and make the report  
22 meaningful.

23                   So we are still struggling with that, but the  
24 data is being collected. And as you see -- I started to say  
25 as you see, I don't think you all were included. We

1 produced a good bit of that data for Florida in confidential  
2 reports, but it is specific to individual companies.

3 Q Does BellSouth measure internally to BellSouth  
4 network call completion rates?

5 A In general, we do not. We measure trunk  
6 blockages.

7 Q And do you measure call completion rates for  
8 calls between BellSouth and ALECs?

9 A Again, not. The trunk blockage is the surrogate  
10 measurement for that.

11 Q Let me ask you to turn, if you could, to your  
12 Late-filed Deposition Exhibit 1. Again, I believe this is  
13 something you referenced during your summary as being  
14 preliminary data for OSS response time?

15 A That's correct.

16 Q And as I understand it, the data in this chart  
17 shows for ALECs using LENS for preordering or ordering the  
18 percent of responses that came back within one second,  
19 within two seconds, within three seconds, and then the  
20 percent that took more than 20 seconds to come back, am I  
21 reading that correctly?

22 A That's correct.

23 Q At what point in the system is this data being  
24 measured?

25 A This data is being measured -- if I could refer

1 you in memory to Ms. Calhoun's diagram -- it is being  
2 measured at the point of interface between LENS and the  
3 Navigator software contracts, which is the same point that  
4 RNS is measured, and the same point that EC-LITE, AT&T's  
5 ordering system will be measured. That is the common point  
6 of access.

7 Q And I believe you stated in your summary the  
8 preliminary measurements indicated that this access time was  
9 nondiscriminatory, and yet I don't see any figures here for  
10 BellSouth?

11 A The figures for BellSouth were produced in my  
12 earlier testimony, and that was -- if you will look at my  
13 direct testimony on Page 27?

14 Q Yes, sir.

15 A The figures for RNS, the four to six second  
16 figures and the figures for DOE -- excuse me, the figures  
17 for RNS were measured at that same point. There is no  
18 directly comparable measure for DOE. That is produced from  
19 a slightly different point, and can't be directly compared.  
20 But the RNS measures were made from the same point.

21 Q I guess my question, Mr. Stacy, is the data on  
22 Page 27 appears to be an average response time whereas the  
23 data on Late-filed Exhibit 1 appears to break that out and  
24 put it into interval categories.

25 A And those intervals -- you are correct.

1           Q       Is the data for those comparable intervals  
2 available for BellSouth?

3           A       It was not available at the time I produced the  
4 late-filed exhibit. It is available and can be made  
5 available. We had a data collection problem with RNS, but I  
6 will be glad to produce that as soon as the data is  
7 available in directly comparable formats.

8           Q       Since I won't have an opportunity to cross  
9 examine you on it, I'm not going to ask for it. Is it true  
10 that BellSouth has not retained any outside consultants to  
11 develop -- to assist in the development of measurements for  
12 parity and performance?

13          A       That's correct.

14          Q       If we could turn to your Exhibit WNS-D, as in  
15 dog, which is the 3-page exhibit showing recommended UNE  
16 provisioning targets?

17          A       Yes.

18          Q       Are those targets the result of negotiations with  
19 AT&T?

20          A       No. Those targets are the results of an analysis  
21 of BellSouth's ability to provision unbundled network  
22 elements.

23          Q       If you turn to Exhibit WNS-A, which is your  
24 performance measurement agreement with AT&T, does that  
25 agreement require -- does that agreement indicate that AT&T

1 and BellSouth will agree on these intervals by July 1 of  
2 1997?

3 A I'm sorry, we are mixing unbundled network  
4 elements and retail intervals here.

5 Q Okay, I'm sorry. Tell me what was to be  
6 developed with AT&T by July 1 of '97?

7 A An agreement on intervals for the services listed  
8 under 2.1 in the AT&T agreement was to be developed, that  
9 has not been concluded.

10 Q Has not been concluded?

11 A Has not been concluded.

12 Q How does BellSouth intend to measure the  
13 compliance with whatever provisioning intervals are  
14 ultimately established?

15 A We intend to use the target interval as one of  
16 the control limits depending on whether it's an upper or  
17 lower, depending on what you are doing, as one of the  
18 control limits and to measure compliance against that using  
19 the same statistical process control format until enough  
20 data is collected to determine what normal variations are.

21 Q Is it true that BellSouth has not proposed any  
22 provisioning intervals for combinations of unbundled network  
23 elements?

24 A To my knowledge we have not.

25 Q Does BellSouth propose an enforcement mechanism

1 of any sort in the event that once a performance standard is  
2 established Bell fails to meet that standard?

3 A BellSouth has not proposed an enforcement  
4 mechanism other than the enforcement mechanisms already  
5 available to the commissions and under the contracts and  
6 arbitration agreements.

7 Q And is it fair to say that in the BellSouth/MCI  
8 agreement the Commission declined to arbitrate an  
9 enforcement mechanism, and there is an enforcement article  
10 that is intentionally left blank?

11 A To the best of my knowledge they did decline to  
12 do that, yes.

13 Q So at this point the only remedy would be for a  
14 carrier who believes itself aggrieved to go to some  
15 regulatory body and say this performance measure is not  
16 being met, help me?

17 A You are beyond me there as an attorney. I don't  
18 know how you would address that.

19 Q Could you turn quickly to Late-filed Exhibit 5.  
20 Well, I've got the wrong reference written down because that  
21 is not the exhibit I want to look at. Bear with me just a  
22 minute.

23 Could you turn to the bottom of Page 29 of your direct  
24 testimony. And at the bottom of Page 29 and the top of Page  
25 30 you have got some comparative measurements of percent of

1 business customers who were out of service for less than 24  
2 hours. I guess that's as a percentage of customers who had  
3 any out of service condition?

4 A A reported out of service condition, yes.

5 Q Did you provide a late-filed exhibit which gave  
6 the number of -- here it is, Late-filed Exhibit 3. Does  
7 Late-filed Exhibit 3 show the universe of incidents that  
8 went into the calculation of these percentages?

9 A Yes, it does.

10 Q And are the number of incidents on Late-filed  
11 Exhibit 3 Florida-specific or are those BellSouth  
12 region-wide?

13 A I believe that those are Florida-specific, but I  
14 would have to validate that. It has been long enough since  
15 we prepared that I am not sure. But I believe they are  
16 Florida-specific.

17 Q And I notice that the percentages calculated on  
18 Exhibit 3 are in some cases different from the percentages  
19 shown on Page 30?

20 A Yes, and I believe the difference is that the  
21 percentages on Page 30 were regional numbers.

22 Q Could you turn to Confidential Late-filed Number  
23 6, and -- it's probably not worth finding. Page -- I can't  
24 find a page number. In the upper right-hand corner it says  
25 Number 631, Page 010, which appears to be a fax designation.

1 It's about two-thirds of the way back in the package.

2 A I'm sorry, could you say the page number again.

3 Q 010, 10. Let me bring it to you.

4 A I have it, but I want to make sure we are looking  
5 at the same page. Yes.

6 Q If you don't regard it as confidential, can you  
7 tell me what company this report relates to?

8 A I cannot tell you what company this relates to,  
9 that would be confidential. The company designator can be  
10 described by knowing the common language location for the  
11 company's offices, which is in the two lines of the -- its  
12 about the fifth line down from the top that starts out ORLD,  
13 which is an Orlando office. The rest of that common  
14 language identifier describes the particular office and  
15 particular company involved.

16 Q Let me ask you this. Does the handwritten note,  
17 does the handwritten notation at the top of the page  
18 indicate the company that's involved?

19 A I believe it does in this case.

20 Q It does?

21 A Yes, I believe it does. Yes, it does. I'm  
22 sorry. I had forgotten how we annotated that one.

23 Q Thank you. Could you turn to the formerly  
24 confidential, now public Late-filed Deposition Exhibit  
25 Number 10.



1 MR. MELSON: And, Commissioners, I believe this  
2 will be in your confidential packet.

3 THE WITNESS: Yes.

4 CHAIRMAN JOHNSON: Mr. Melson, how much more are  
5 you going to have?

6 MR. MELSON: Five or six minutes.

7 CHAIRMAN JOHNSON: Okay.

8 BY MR. MELSON:

9 Q This exhibit -- if I can get my highlighted copy,  
10 it will be easier to meet my time commitment. This exhibit  
11 shows activities that are going to be undertaken by  
12 BellSouth to improve, or enhance, or change the LENS  
13 interface, is that correct?

14 A That's correct.

15 Q What is the basis for the designation of the  
16 priorities urgent, high, medium, low?

17 A The basis for that is a designation of the  
18 sponsoring committee's interpretation of what the priority  
19 is that should be applied to that particular change request.

20 Q And after the abstract title column there is a  
21 column labeled state. What does open mean, and what does  
22 working mean?

23 A Open means that there are -- that the change  
24 request has been created, that requirements are being  
25 written, but that coding has not begun. Working is the

1 designator when system coding actually starts.

2 Q On the top, on Page 1 there are a number of  
3 items, 11, 64, 66, 67, 68, 69, where there is a reference to  
4 loop/port, interim local number portability, port/loop  
5 combination, what activity do those refer to? What is going  
6 to be done with loops?

7 A That is the activity referred to originally by --  
8 to add the ability to LENS to order a loop using a form, an  
9 unbundled network element loop using a form based order.

10 Q So that is the one that is designed to get it out  
11 of the remark section and get it into a more normal type of  
12 ordering process?

13 A That's correct.

14 Q About halfway down that page, Item 1288,  
15 jeopardies, what does that mean?

16 A That is an item to change the way jeopardies are  
17 displayed in the status section in LENS.

18 Q Turn to the last page of this exhibit, Item 2237,  
19 reject/fatal edits. Can you tell me what that is designed  
20 to address?

21 A That is similar to jeopardies, it is a different  
22 category of errors. It is to change the way that errors  
23 that we call rejects or call fatal edits are displayed in  
24 the status section in LENS.

25 Q How are they displayed today and how will they be

1 displayed once this work has been completed?

2 A I am not familiar with all the difference between  
3 today's and the proposed one.

4 Q And what does Item 2294, state-specific testing  
5 Florida refer to?

6 A There are a series of software tests that are  
7 opened each time functionality is added and then closed that  
8 test the ability of the system to handle categories of  
9 orders or combinations of orders that are unique to a  
10 specific state. And that series of comments refers to  
11 testing that is ongoing to verify that features and services  
12 that are unique to Florida are properly functioned.

13 Q For an order placed through LENS, does LENS  
14 return a status report of some sort?

15 A LENS does not return a status report, but LENS  
16 has the capability to retrieve the status report from the  
17 LEO data base.

18 Q LENS allows a user to log on and to access a  
19 status report by affirmatively going to that report?

20 A That's correct.

21 Q Are there situations in which LENS will not  
22 return a status?

23 A Yes, there are situations in which LENS will not  
24 find a status in the local exchange ordering system.

25 Q Without regard to the question of whether or not

1 it is required under the MCI/BellSouth interconnection  
2 agreement, will BellSouth make available to ALECs -- I'm  
3 going to call it a data dump of the RSAG data base, transfer  
4 the RSAG data base to an ALEC so that it could make address  
5 validations and other inquiries of its own data base rather  
6 than using LENS to access the BellSouth data base?

7 A To the best of my knowledge, BellSouth has not  
8 agreed to do that.

9 Q And why not?

10 A I'm not familiar with all of the reasons. There  
11 are some technical reasons involved in the frequency and  
12 management of up dates, there are some proprietary reasons  
13 involved in the structure of the access to the data base,  
14 the coding. But that was a decision that I was not directly  
15 involved in.

16 Q I believe you told us during a LENS demonstration  
17 that you did informally for the staff that one of the  
18 reasons was the size of the RSAG data base. Is that, in  
19 fact, one of the reasons?

20 A I call that technical complexity, it's a  
21 combination of size, the fact that it's a distributed data  
22 base and the frequency of updates. But there were other  
23 reasons, as I understand it. Like I said, I was not  
24 directly involved in that decision.

25 Q And, finally, does BellSouth intend on an ongoing

1 basis to measure percentage of local service requests  
2 processed within 48 hours?

3 A No, we have not established that measurement.

4 Q Is that a measurement that one of your  
5 consultants has used to evaluate the efficiency of the local  
6 carrier service center?

7 A I believe it is a measurements that was used for  
8 the manual order entry.

9 MR. MELSON: That's all I had. Thank you very  
10 much, Mr. Stacy.

11 CHAIRMAN JOHNSON: I think this will be a  
12 convenient breaking point for us, so we will reconvene with  
13 AT&T tomorrow. Any other -- Ms. Barone, you seem puzzled.

14 MS. BARONE: Are we going to -- I'm sorry, did  
15 you still need clarification on the list?

16 MS. WHITE: If we could maybe go through the  
17 witnesses after Mr. Stacy is off and after Mr. Scheye is  
18 called back and off the stand again. I would assume that  
19 tomorrow, God willing and the creeks don't rise, that Mr.  
20 Gillan will be first?

21 CHAIRMAN JOHNSON: You mean after we finish Mr.  
22 Stacy?

23 MS. WHITE: Yes. And after Mr. Scheye has been  
24 called up and gone off again. So it would be Mr. Gillan,  
25 then it would be Mr. Wood, Mr. Kaserman is stipulated in,

1 then Mr. Hamman, Mr. Bradbury, Mr. Pfau. Mr. Pfau is  
2 definitely going to be on Monday?

3 MR. HORTON: Yes, ma'am.

4 MS. WHITE: Okay. Mr. Kinkoph, Ms. Pacey is  
5 stipulated in, Ms. Strow it looks like she will come in  
6 order.

7 MS. CANZANO: Excuse me, we would like to be able  
8 to have Ms. Strow on Monday, because she will only be  
9 available then.

10 MS. RULE: Interestingly, I just heard that Mr.  
11 Pfau will only be available Monday.

12 CHAIRMAN JOHNSON: We may have to work through  
13 this, and figure out -- I'm going to allow you all to sit  
14 down and -- Ms. Rule.

15 MS. RULE: I'm told he may be available after  
16 Wednesday, but I sure hope we would all be done by then.

17 CHAIRMAN JOHNSON: Is that the motivator here?

18 MR. MELSON: She has Wednesday in the pool.

19 MS. RULE: I'm sorry, he is not available  
20 Thursday.

21 MS. WHITE: See, this is what we do up at this  
22 table, is we set up these pools about when, and at what time  
23 and what date these hearings are going to be over.

24 MS. BARONE: We do, too.

25 COMMISSIONER GARCIA: By the way, the Chairman

1 always wins.

2 MS. WILSON: I didn't cast my vote until after  
3 BellSouth did.

4 CHAIRMAN JOHNSON: Who are the witnesses that we  
5 had scheduled originally that needed to be heard on Monday?

6 MR. BOYD: Ms. Closz is designated for Monday.

7 CHAIRMAN JOHNSON: Ms. Closz, and then ACSI,  
8 earlier on you had asked for your witness to be heard on  
9 Monday.

10 MR. HORTON: Chairman Johnson -- I have moved  
11 over here. That's correct, he has got to be in Louisiana  
12 with more hearings the latter part of the week.

13 MS. BARONE: And, Madam Chairman, we did get a  
14 letter from Mr. Horton awhile ago on that.

15 CHAIRMAN JOHNSON: But Ms. Strow, this is a new  
16 request, right?

17 MS. CANZANO: Yes, this is a new request based on  
18 a rescheduling conflict.

19 MS. RULE: Also a new request for Mr. Pfau. Ms.  
20 Strow and Mr. Pfau.

21 CHAIRMAN JOHNSON: I'm going to sit down with  
22 staff and we are going to try to work through these and see  
23 -- at least lay out a list of who we will hear on Monday and  
24 see how many of them we can get through. And that is also  
25 contingent upon what happens tomorrow. So we will do the

1 best that we can, but I don't know if we will be able to  
2 accommodate everyone.

3 MS. CANZANO: Thank you your consideration.

4 MR. MELSON: Commissioner Johnson, one other  
5 housekeeping, since it may affect the pool. Did you all  
6 have any thoughts that you might go after the agenda on  
7 Tuesday? Is there any need for us to alert our witnesses  
8 that they need --

9 MS. WHITE: Well, the pool has to be redone if  
10 they decide --

11 MS. CANZANO: I'm not sure they know about the  
12 pool.

13 CHAIRMAN JOHNSON: It doesn't matter. It doesn't  
14 matter to me. If we have time then we will. It's hard to  
15 gauge what time, so that makes it a bit difficult.

16 COMMISSIONER CLARK: But only if you let Ms.  
17 White change her date.

18 MS. WHITE: Thank you, Chairman.

19 MS. RULE: Then we all get to revote.

20 CHAIRMAN JOHNSON: We will try to work through  
21 that, too.

22 MS. RULE: Chairman, the only thing we are asking  
23 for is parity.

24 CHAIRMAN JOHNSON: We will reconvene tomorrow at  
25 9:00.



1 (Transcript continues in sequence with  
2 Volume 15.)  
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