

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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 - AFTERNOON SESSION

VOLUME 13

Pages 1380 through 1475

PROCEEDINGS: HEARING

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

DATE: Thursday, September 4, 1997

TIME: Commenced at 9:00 a.m.

PLACE: Betty Easley Conference Center
 Room 148
 4075 Esplanade Way
 Tallahassee, Florida

REPORTED BY: Lisa Girod Jones, RPR, RMR

APPEARANCES:
 (As heretofore noted.)

BUREAU OF REPORTING
 RECEIVED 9-4-97

DOCUMENT NUMBER-DATE

08944 SEP-56

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

2 (Transcript continues in sequence from
3 Volume 12.)

4 (After brief recess, hearing resumed at
5 3:10 p.m.)

6 CHAIRMAN JOHNSON: We're going to go back on
7 the record. Ms. Rule.

8 GLORIA CALHOUN
9 continues her testimony under oath from Volume 12.

10 CONTINUED CROSS

11 BY MS. RULE:

12 Q Ms. Calhoun, what is a service order reject?

13 A A service order reject can be for a number of
14 reasons. A reject --

15 COMMISSIONER GARCIA: Is the question what is
16 a server reject?

17 MS. RULE: Service order reject.

18 COMMISSIONER CLARK: He heard social reject, I
19 think.

20 WITNESS CALHOUN: It's an order that's
21 rejected by a system for one reason or another.

22 Q (By Ms. Rule) Would you turn in Attachment
23 15 to Page 4, please.

24 COMMISSIONER KIESLING: I'm sorry, would you
25 repeat the page number?

1 MS. RULE: Page 4 of Attachment 15.

2 Q (By Ms. Rule) Do you have that?

3 A Yes.

4 Q And could you read, please, aloud,
5 paragraph 5.1.5.

6 A "Both parties agree to complete the defined
7 translations, establish a query response cycle time
8 commitment, including but not limited to order rejection
9 and firm order confirmation, and proceed to systems
10 readiness testing, as more fully described in
11 Section VII, that will result in a fully operational
12 interface for resale of local service by March 31st,
13 1997."

14 Q The reference to a translation including a
15 response cycle time -- or including, but not limited to
16 order rejection, that would include the service order
17 reject; would it not?

18 A Yes.

19 Q Has BellSouth established or provided AT&T
20 with this capability yet?

21 A Yes.

22 Q When?

23 A I don't recall the exact date, but my
24 recollection was that it was prior to March 31st, 1997.

25 Q I'm going to pass out a letter. Do you have

1 that?

2 A Yes.

3 Q Have you seen this before?

4 A Yes. I also saw this in Kentucky last week.

5 Q And this letter discusses -- it's a letter
6 from AT&T to BellSouth discussing BellSouth's
7 obligations to implement electronic reject capability;
8 is it not?

9 A Yes.

10 Q The Georgia interconnection agreement
11 mimics -- or actually the Florida interconnection
12 agreement mimics the Georgia agreement in that it
13 provides the same requirement as you just read in
14 paragraph 5.1.5. Could you read the second paragraph of
15 this letter, please?

16 A I'll accept what you said about the Georgia
17 agreement subject to check. What I'm reading from here
18 is the Florida agreement.

19 Q Yes.

20 A Okay. And you wanted me to read?

21 Q The second paragraph of the letter.

22 A "Our Georgia interconnection agreement
23 requires BellSouth to provide AT&T with the electronic
24 capability to receive service order rejects by no later
25 than March 31st, 1997. BellSouth has failed to meet

1 that date and subsequent commitments to provide such
2 capability by April 21st, 1997, July 31st, 1997 and then
3 September 8th, 1997."

4 Q Could you read the next sentence?

5 A "Marsha Moss of BellSouth now states without
6 explanation that BellSouth will not be providing such
7 capability until November, eight months from that
8 negotiated date set forth in our interconnection
9 agreement."

10 Q Is it your testimony that BellSouth has
11 provided this capability in Florida?

12 A It's my testimony that BellSouth has provided
13 the order rejection that is called for under the
14 interconnection agreement as described in paragraph
15 1.1.3 of the interconnection agreement, and that this
16 letter relates to an additional capability that's been
17 discussed among the parties, or between the parties.

18 Q Could you tell me whether DSO, DS-1 and DS-3
19 private lines are examples of complex services?

20 A Excuse me, give me the list again, please.

21 Q DSO, DS-1 and DS-3 private lines.

22 A Yes.

23 Q How about Basic Rate ISDN?

24 A Yes.

25 Q Are IXCs able to order these services from

1 BellSouth today?

2 A Interexchange carriers?

3 Q Yes.

4 A I don't know about ISDN. There are DSO, DS-1
5 and DS-3 level access services.

6 Q And do they do that by sending an access
7 service request over the exact interface?

8 A I don't know if they do. I believe that in
9 the DS-3 ordering environment there are account teams
10 involved in that process, and I'm not certain about the
11 other two.

12 Q So your answer is you don't know?

13 A I don't know for DSO and DS-1.

14 Q And for DS-3, is it your testimony that they
15 do not order it over the exact interface?

16 A It's my testimony that -- I better say I don't
17 know on that one too.

18 Q Pardon me?

19 A I'll say that I don't know on that one too.

20 Q Thank you. Have you submitted the results of
21 any carrier-to-carrier testing in this docket?

22 A I personally have not.

23 Q Have you submitted the results of any
24 independent third party testing of BellSouth's OSS
25 systems?

1 A I have not.

2 Q So your opinion that BellSouth's interfaces
3 and operational support systems comply with Section 271
4 requirements are not based on the results of that type
5 of carrier-to-carrier or independent third party
6 testing?

7 A That's right. They're based on the results of
8 systems testing and internal testing by BellSouth's
9 systems experts.

10 MS. RULE: No further questions.

11 MR. SELF: No questions.

12 COMMISSIONER KIESLING: I have one question
13 before you go any further. Did you want this letter as
14 an exhibit?

15 MS. RULE: Thank you very much. Yes, I would.

16 COMMISSIONER KIESLING: You're welcome.

17 MS. RULE: And that would be I believe
18 identified as No. 50?

19 CHAIRMAN JOHNSON: Be identified as 50 and
20 short title, Nelson August 21 Letter.

21 (Exhibit No. 50 marked for identification.)

22 CROSS EXAMINATION

23 BY MR. WIGGINS:

24 Q Good afternoon, Ms. Calhoun. Pat Wiggins for
25 Intermedia.

1 You've covered a wide range of topics today,
2 so I would just like to take a moment and make sure I
3 understand the focus of your testimony. My
4 understanding is that it's -- that you essentially focus
5 on the OSS functions of preordering and ordering for
6 ALECs and how those functions compare to the similar
7 functions for Bell's retail operations; is that a fair
8 statement of the focus of your testimony?

9 A It's not limited to preordering and ordering.
10 It's the required OSS functions required by the FCC were
11 preordering, ordering and provisioning, maintenance and
12 repair and billing information.

13 Q Thank you. If I ask you any questions that
14 are beyond the scope of your testimony, please feel free
15 to say so, and we'll make everyone happier and move on.

16 Is BellSouth currently providing CABS billing
17 to any ALEC?

18 A Providing?

19 Q C-A-B -- is it CABS?

20 A CABS billing?

21 Q Yes.

22 A Going back to the discussion we had earlier,
23 we have provided test files to both AT&T and MCI.

24 Q Okay.

25 A When you say CABS billing, let me back up.

1 CABS billing for resold services?

2 Q Yes.

3 A Yes. We began in July to provide test data to
4 AT&T and MCI.

5 Q Is that still in the testing phase?

6 A Yes.

7 Q Okay. Do you know whether Intermedia has
8 requested CABS?

9 A I don't know.

10 Q Do you know what kind of billing Intermedia
11 receives from BellSouth?

12 A I don't know.

13 Q You've testified there are certain services
14 that an ALEC can order using EDI, correct?

15 A Yes.

16 Q Do you know of any ALEC who uses paper LSRs
17 currently today to order services it could order using
18 EDI?

19 A I don't know that I could name one
20 specifically. I know that some ALECs do send paper LSRs
21 and that EDI is available to any CLEC.

22 Q I guess my question is pretty
23 straightforward. Do those paper LSRs that some ALECs
24 are continuing to send, could they have ordered those
25 services through EDI?

1 A Yes.

2 Q Do you have any idea why they continue to use
3 paper LSRs?

4 A No.

5 Q Have you ever inquired?

6 A No.

7 Q If Intermedia wished to order a DS-1, would
8 they need to do that through their account team?

9 A Yes.

10 Q Could you explain briefly how that -- how that
11 would work?

12 A Yes. Complex services that are -- excuse me,
13 a CLEC account team from interconnection services would
14 provide a systems designer to work with the CLEC to
15 obtain any necessary preordering or ordering
16 information.

17 Q And ultimately the -- I don't know, would it
18 be an LSR for that as well? The LSR for that would be
19 sent to the LCSC?

20 A I don't know if technically that's an LSR, and
21 I don't believe it would be sent to the LCSC. There's
22 another ordering center that handles complex services
23 that would physically input the final order.

24 Q Would that be the same service center that a
25 Bell retail DS-1 would be sent to?

1 A No, I don't believe so. The name of the
2 center escapes me, but as I recall it's the center -- I
3 think it might be called the vendor service center.
4 It's one that a -- a vendor of PBX equipment, for
5 example, might work -- would handle orders for a vendor
6 of, say, PBX equipment.

7 Q So there are -- so CLECs have one center that
8 handle their order, such as a DS-1, and BellSouth retail
9 services has another center that handles similar orders
10 for retail; is that correct?

11 A Yes.

12 Q I'm a little puzzled at this point. I was
13 under the impression that the LCSC actually is the one
14 that handles the -- would handle the DS-1 order. But
15 your testimony is that it's someone else? It's another
16 center?

17 A Yes. That's my recollection. There are a
18 number of complex services, and I -- my recollection of
19 the DS-1 is that it's handled by that other center.

20 Q But your testimony is that the -- that the OSS
21 support for both sales, both the retail sale on
22 BellSouth's side and the provisioning of the ALEC DS-1,
23 are sufficiently comparable for their to be parity?

24 A Yes.

25 Q So when you give that testimony, are you

1 presupposing that the center for the CLECs operate at
2 generally the same level of efficiency and proficiency
3 as the retail center does?

4 A Yes.

5 Q Are you familiar with the quality of service
6 provided by BellSouth's LCSCs, or is that beyond the
7 scope of your testimony?

8 A That's beyond the scope of my testimony.

9 Q Are there any mechanized systems for ordering
10 subloop -- unbundled subloop elements?

11 A I was asked that question earlier and I am
12 just not familiar with the subloop element itself to
13 recall -- and I believe the documentation is contained
14 in Mr. Milner's testimony.

15 Q I'm sorry I asked you a redundant question.

16 I do want to revisit an area Mr. Melson spoke
17 with you about, and I'll try to do it without being
18 redundant. As I understand it, there are about 30
19 resale services that can be ordered through EDI; is that
20 correct?

21 A No. The 30 -- the list of 30 resold services
22 are those that can be ordered via EDI and that also have
23 mechanized order generation on BellSouth's side of the
24 interface. There are additional services that also can
25 be ordered via EDI.

1 Q Thank you for that clarification. If I
2 understand the process correctly, Intermedia, for
3 example, if it wishes to place an order using an LSR
4 through EDI, will submit that order through EDI, and if
5 there is a problem with the way the EDI -- I want to
6 call it a paperless LSR -- the way the paperless LSR is
7 filled out, the EDI system has a filter in it that will
8 send back a message saying, no, this is invalid; is
9 that --

10 A Yes.

11 Q That error message -- do they have a number
12 for that? Is it 97 --

13 A 997 transaction set.

14 Q 997. Is it true that that checks for only the
15 EDI protocol, that as long as the EDI protocol is
16 correct, and letters are filling the fields where they
17 need alpha characters and numbers are filling the fields
18 where it needs numerical characters, it will go through?

19 A Yes.

20 Q So could put "War and Peace" through there and
21 it would still go through as long as the fields were
22 filled?

23 A I'm having trouble visualizing putting "War
24 and Peace" through the EDI interface.

25 Q That would be data compression. I'll strike

1 that silly question before someone else does.

2 So it is possible, I think -- let me strike
3 that. So there are situations where a paperless LSR
4 through EDI can clear the EDI validity check and make it
5 to the next step only to be rejected again, to be
6 rejected at that point; is that correct?

7 A Yes, that's correct.

8 Q And at that point it is again sent to the
9 LCSC?

10 A Yes.

11 Q So from the ALEC's perspective, they can send
12 an EDI order, get confirmation back that it's valid and
13 yet still have it rejected in a subsequent step?

14 A Well, they get confirmation back that it's
15 been received and accepted by the system for further
16 processing. Technically that's not the same thing as
17 saying -- as confirmation that it's valid.

18 Q Okay. Thank you. Is one thing that might
19 result in a clari -- is it clarification -- let me back
20 up.

21 What is it that the LCSC sends the ALEC when
22 they find out that for whatever reason the paperless EDI
23 LSR did not make it through the second filter? What is
24 that called?

25 A The order goes for clarification.

1 Q All right. I would like to call that
2 "clarification notice"; is that okay with you?

3 A Okay, that's fine.

4 Q Is one thing that might trigger a
5 clarification notice a misspelling or some sort of
6 grammatical problem in one of the fields, a typo in the
7 fields?

8 A It would depend on which field and what the
9 nature of the problem was.

10 Q What might cause -- once it made it through
11 the first filter, only to not make it through the second
12 filter, so a clarification notice was faxed to the ALEC,
13 what might be a problem that would cause that to happen?

14 A I think the example we used earlier was if an
15 apartment number were missing, for example.

16 Q Suppose there was call forwarding in the
17 account. Would your system need to know what that call
18 forwarding number was, if it was resident in the central
19 office?

20 A I'm not sure I understand your question. I
21 mean, that sounds like a context specific question, and
22 I don't know what your context is.

23 Q Let me ask it more generically. Are there
24 certain -- in a switch "as is" situation, are there
25 certain functionalities that a customer may have that

1 would not be registered in the paper LSR so that when it
2 hit the second filter it could not be processed without
3 having it sent to the LCSC for clarification?

4 A I'm still having trouble with your question.

5 Q Let me -- no problem. Let me ask it another
6 way. Is it possible for the ALEC to have entered
7 everything perfectly in the EDI LSR, have the EDI LSR
8 codes be perfect, there's no problem with what's written
9 on the page, have it clear the first filter, hit the
10 second filter, and be sent to the LCSC for clarification
11 because there was something about the service that the
12 customer was receiving that required further
13 information?

14 A I can't, off the top of my head, envision a
15 situation in which that would occur. But to go back to
16 a disclaimer I think I've given a couple of times now,
17 I'm not a service representative and I don't know the
18 ins and outs of every service that BellSouth offers, so
19 I don't think I can categorically say that that would
20 never happen.

21 Q So from your perspective, with the exposure
22 you have, it would be your view that if there was a
23 clarification needed, it would be due to some mistake in
24 the LSR?

25 A Yes.

1 Q Okay. You may have already been asked this,
2 and if you have, I'm sorry. Do you have any data -- do
3 you have any knowledge of what percentage of LSRs
4 overall that make it through the first filter to be --
5 only to not make it to the second filter and to be sent
6 to the LCSC for clarification, what that percentage is?

7 A I don't.

8 Q Do you have any knowledge of what percentage
9 of Intermedia's LSRs submitted through EDI end up
10 needing clarification?

11 A I don't know.

12 Q And I think I only have a couple more
13 questions. And you may have already given this
14 testimony.

15 When Intermedia sends a paperless LSR through
16 EDI, how long should it be before they receive a firm
17 order confirmation?

18 A I think it depends on the type of service. As
19 I understand it, firm order confirmations, in some cases
20 the time frames are contractually defined. I don't know
21 that you can categorically make a statement that applies
22 to all services.

23 Q Switch "as is" R1, how long would it be? Like
24 48 hours? 24?

25 A Switch "as is"?

1 Q Basic residential.

2 A The firm order confirmation on that should
3 be -- again, depending on whether they send it
4 immediately or what the batch time is, it's going to
5 flow through BellSouth's systems in I think about less
6 than five minutes.

7 Q So they should -- this is really not a trick
8 question. So Intermedia should be receiving back firm
9 order confirmations on EDI submitted LSRs within 48
10 hours?

11 A I know no reason why they should not for the
12 type of service you described.

13 Q For a similar type of service, a switch "as
14 is" simple residential, if it's -- if it needs further
15 clarification and it's sent to the LCSC, about how long
16 should it take the LCSC to send Intermedia a fax saying
17 clarification is needed?

18 A I don't know. Again, the workings of the LCSC
19 are beyond the scope of my testimony.

20 MR. WIGGINS: I think --

21 COMMISSIONER CLARK: Ms. Calhoun, you
22 mentioned something that I wanted to ask about, and that
23 was the batch and the individually sending it.

24 WITNESS CALHOUN: Yes.

25 COMMISSIONER CLARK: Who decides whether to

1 batch it or send it individually?

2 WITNESS CALHOUN: In this case it's my
3 understanding that Intermedia would be using the EDI PC
4 package and they would determine -- I think I showed on
5 the screen yesterday, they have the option of queuing it
6 to be sent as a group or of sending it immediately.

7 COMMISSIONER CLARK: Why wouldn't they send it
8 immediately? Why would they batch it?

9 WITNESS CALHOUN: EDI traditionally has
10 exchanged data in batches at predetermined intervals.
11 Those can be set for every couple of minutes, just take
12 everything you have, send it, send those across, or I
13 mean just depending on the volume of transactions -- and
14 again, I can't speculate.

15 COMMISSIONER CLARK: You don't know why?

16 WITNESS CALHOUN: No, I can't speculate why an
17 ALEC would choose to do it one way versus the other.

18 COMMISSIONER CLARK: But it's their choice?

19 WITNESS CALHOUN: Yes.

20 MR. WIGGINS: Thank you. I have no further
21 questions.

22 CROSS EXAMINATION

23 BY MR. BOYD:

24 Q Hello, Ms. Calhoun. I'm Everett Boyd for
25 Sprint/SMNI. Let me follow up on one thing that

1 Mr. Wiggins asked. He asked you about the paper LSRs
2 being sent. Is the LCSC the correct way --

3 COMMISSIONER KIESLING: Mr. Boyd, can you talk
4 into the mike? When you turn to face her your mouth
5 goes way beyond the mike and then I can't hear you. And
6 if I can't, I don't think the other end can. Thank
7 you.

8 MR. BOYD: Thank you, Commissioner.

9 Q (By Mr. Boyd) Is the LCSC the correct place
10 for a paper LSR to be sent?

11 A Yes.

12 Q Or Fed Ex'd by the people who chose to do it
13 that way?

14 A (Indicating)

15 Q Now I believe Ms. Rule asked you about the
16 LENS system and some enhancements or modifications that
17 are going to be made in the future. Are there planned
18 enhancements later this year?

19 A Yes.

20 Q At the present time, can a loop, unbundled
21 loop, be ordered through the LENS system?

22 A Yes, it can. That's one of the things we
23 showed earlier at the request of one of the parties. I
24 can't quite remember who.

25 Q That was where it was typed in under the

1 remarks section?

2 A Yes.

3 Q And is that functionally the equivalent of
4 sending a fax?

5 A I don't know how to respond to that. I would
6 say -- excuse me. No, it's not the functional
7 equivalent of sending a fax. When an order is sent in
8 via the LENS interface, it comes into the LEO database.
9 It will be routed electronically to a screen -- it will
10 appear to the BellSouth service representative already
11 in their system.

12 Q That's for an unbundled loop?

13 A Yes.

14 Q And what part in your diagram does -- is it
15 routed out by LEO?

16 A To the local carrier service center, to the --
17 technically it's shown as the LCSC work list. That's an
18 electronic screen.

19 Q And the LCSC then has to perform further work
20 so that that order can be processed?

21 A Yes.

22 Q And are the enhancements planned for the LENS
23 ordering system for later this year, do they include a
24 change that would make the ordering of unbundled loop
25 entirely mechanized?

1 A Yes, that is one of the changes.

2 Q And is that scheduled to be implemented in the
3 fourth quarter of this year?

4 A I'm not sure of the exact date.

5 Q Is the -- is "flow through" a correct
6 terminology for a mechanized order?

7 A "Flow through" can have different meanings for
8 different people. I think the safest term is
9 "mechanized order generation."

10 Q And does that mean it goes on into the systems
11 that you've described without the manual intervention?

12 A Yes.

13 Q I believe in the -- your answers to some of
14 the questions by Mr. Melson or Ms. Rule, when you were
15 talking about selection of the telephone numbers and
16 there's an entry on the screen for "keep" the number; is
17 that the right terminology?

18 A Yes.

19 Q And I think you cautioned us that that was not
20 a final assignment of the number and that -- so that the
21 ALEC should not guarantee that number to the customer at
22 that point; is that right?

23 A Yes, just as it's BellSouth's practice for its
24 retail customers.

25 Q And at what point in the process does that

1 selection become final and that you can rely upon it?

2 A When the service is installed.

3 Q Does the FOC, that is returned in the system,
4 reflect the telephone number assigned?

5 A Yes.

6 Q And can the ALEC rely upon the number referred
7 to in the FOC as being a final selection?

8 A No. Again, this is the same thing we've
9 always done for our retail customers, which is to say,
10 this is the number, chances are you'll have it, don't
11 take it to the printers until it's installed.

12 Q Now, as Mr. Wiggins asked you, and you
13 reexplained, that the focus of your testimony is the 271
14 parity requirements of the access to OSS; is that right?

15 A Yes.

16 Q And obviously we've been talking about the
17 preordering and the ordering functions there in large
18 part today; haven't we?

19 A Yes.

20 Q And in order to determine whether there is
21 parity with the BellSouth's own systems, you have to
22 compare it to -- for residential the RNS, and business
23 the DOE; is that right?

24 A Yes.

25 Q And Mr. Melson, I think, at one point

1 mentioned the demonstration in Jacksonville. That was
2 last week; is that right?

3 A I think it was the week before. I guess I'd
4 have to say I've lost track of time. I don't know. I
5 wasn't there.

6 Q I was not there either. Within the past two
7 weeks?

8 A Yes.

9 Q And was the purpose of that demonstration, at
10 least in part, to allow the Staff and parties to get a
11 chance to observe the RNS and the DOE systems in actual
12 operation?

13 A I would assume so. I wasn't involved in
14 the -- I just wasn't involved in that demonstration.

15 Q Do you know whether that was the first time
16 that the parties here have been able to observe the RNS
17 and the DOE systems?

18 A I don't know. I recall AT&T's Mr. Bradbury
19 testifying in another state or -- testifying in another
20 state that he had -- he had observed those systems at
21 some point.

22 Q And as part the demonstration that -- with
23 your setup here, have you made it possible for the
24 Commission to observe the RNS system and the DOE systems
25 in operation, to check for the parity requirement?

1 A No, I don't have any way of reaching the RNS
2 or the DOE systems from here.

3 Q Now I know that -- and understand that
4 BellSouth is relying upon the EDI interface for the
5 parity requirement for the ordering function; that's
6 correct?

7 A The combination of the EDI and the --

8 Q And the EXACT?

9 A And the EXACT system, yes.

10 Q And you've explained about the ordering
11 capabilities in the LENS system. Would you agree that
12 without regard to the EXACT and the EDI, that the
13 ordering capabilities of the LENS system by itself do
14 not meet the 271 parity requirements?

15 A First of all, let me say that you've been
16 using the word "parity," and I've been kind of going
17 along with that. But when you talk about the Act, I
18 don't recall the word parity in the Act. What I am
19 speaking of is in terms of the non-discrimination
20 obligation, or non-discriminatory access.

21 And I believe that the LENS ordering function
22 does provide non-discriminatory access for the functions
23 it supports, but it does not yet support the full range
24 of functions that the industry standard, EDI ordering
25 interface, does.

1 Q So for the full range of services that are
2 available for ALECs to purchase and order, the LENS
3 system does not meet the non-discrimination standards of
4 ordering, does it?

5 A No, it does not yet support all of those
6 functions, but it provides those functions in a
7 non-discriminatory manner for the functions it supports.

8 Q Exhibit 46 was the June 16th memo to the ALECs
9 about the provisioning intervals?

10 A Yes.

11 Q Do you recall that? Is there an interval on
12 this list for the ordering of an unbundled loop?

13 A No. If you look at the cover letter, this
14 is -- the first sentence reads, "BellSouth is pleased
15 to provide you initial target intervals for the
16 provisioning of retail/resale products."

17 Q Is there a similar memo or other documentation
18 of an expected interval for ordering UNES?

19 A Yes. I recall that those have been published,
20 but I don't happen to have one.

21 Q Was that part of the plethora of exhibits that
22 were part of your testimony?

23 A No.

24 Q The BellSouth customer service
25 representatives, when they're using the RNS system and

1 the DOE systems to interact with customers, they use
2 those opportunities for sales or marketing efforts, do
3 they not?

4 A Yes.

5 Q And somewhere -- I think it was in your
6 testimony, I saw something paraphrased like "each
7 contact is an opportunity for marketing." Does that
8 sound -- is that an accurate statement in terms of the
9 BellSouth retail operations?

10 A I don't recall that statement in my testimony
11 and I'm not here to talk about BellSouth's retail
12 marketing practice.

13 Q At Page 19 of your direct testimony, I think
14 it's 16 through 18, you refer to the limited need for
15 preordering information in the instance of a switch "as
16 is" customer. Do you recall that?

17 A Yes.

18 Q And were you suggesting that an ALEC, when in
19 contact with the customer who indicates initially that
20 they want to switch as is, that the ALEC would have no
21 need for the preordering customer service record
22 information?

23 A No. The term I use is a "limited need," and
24 what I'm pointing out here is that there's a good reason
25 that the industry prioritized ordering, the exchange of

1 ordering information, a year or so ahead of its efforts
2 on prioritizing preordering information, because there's
3 a huge base of installed customers who already have
4 telephone numbers assigned, who already have addresses
5 that are valid in the system, who already have services
6 installed and don't need the date that an installer can
7 come to their premises, and that there is less of a need
8 for preordering information for those customers who just
9 want to switch service providers. But saying that
10 there's a limited need is not the same thing as saying
11 that there's no need for it.

12 Q But you would agree that it's reasonable for
13 an ALEC to want to take each opportunity to market
14 additional services that it offers; do you not?

15 A Yes, and by providing real-time interactive
16 access to the same database that BellSouth uses to get
17 that product and service information, BellSouth has made
18 that information available to the ALECs.

19 Q Can an unbundled loop be ordered in -- through
20 the EDI interface?

21 A Yes.

22 Q And does it -- is it a mechanized order
23 process?

24 A It's mechanized in terms of the receipt of the
25 order and the flow of the information back. It involves

1 some manual handling in the local carrier service
2 center.

3 Q So is it handled in essentially the same way
4 as an order in the LENS system?

5 A Yes.

6 Q In your last answer you refer to information
7 going back. Do you mean back to the ALEC?

8 A Yes, in the sense of firm order confirmations,
9 or completion notifications for example. The
10 provisioning aspect of the ordering and provisioning
11 interface.

12 Q And the -- I guess the principal interface
13 that you're relying upon for the ordering of loops is
14 the EXACT system; is that correct?

15 A No. The industry is recommending the use of
16 the EDI interface.

17 Q The EXACT is the interface that you're relying
18 upon for the bulk of the unbundled network elements?

19 A For the -- what I would call the
20 infrastructure unbundled network elements.

21 Q And can loops -- unbundled loops be ordered
22 through the EXACT interface?

23 A Technically they can, but the industry
24 recommends EDI for the use of unbundled loops, and
25 BellSouth's interface supports ordering of unbundled

1 loops in the industry recommended method.

2 Q So your answer was that, yes, unbundled loops
3 can be ordered through the EXACT interface; is that
4 right?

5 A My answer was that technically, yes, but the
6 industry does not recommend it.

7 Q Are you aware of ALECs that order unbundled
8 loops using the EXACT interface?

9 A I'm aware that some ALECs have done that. I'm
10 not sure if anyone is currently doing that.

11 Q And when an unbundled loop is ordered through
12 the EXACT interface, does it require the human -- the
13 manual intervention that we talked about with the other
14 two interfaces?

15 A Yes, in effect it's being ordered as a special
16 access circuit and it's handled the same way that
17 special access circuits have been. They come to a
18 screen in front of a service representative and the
19 service representative will review the information on
20 the screen, add information that may be needed and send
21 the order on its way.

22 Q And is that service representative located in
23 the LCSC?

24 A I don't know.

25 Q Does the -- does an order for an unbundled

1 loop sent through the EXACT interface, is it routed to
2 the LCSC at some point?

3 A I don't know.

4 Q If an order is placed for an unbundled loop
5 using the EXACT interface, the EXACT -- there is a
6 provision for an inquiry mode for that order through
7 that -- through the EXACT system; is there not?

8 A I'm not sure what you're describing, I don't
9 think I understand your question.

10 Q I'll rephrase that. If an order is placed for
11 an unbundled loop via the EXACT system, after it's sent,
12 can the ALEC perform an inquiry to determine the status
13 of that order?

14 A I don't know.

15 Q If an unbundled loop is ordered through the
16 LENS interface, can the ALEC use the inquiry mode to
17 determine the status of that order for the loop?

18 A The inquiry mode of LENS?

19 Q Yes, ma'am.

20 A No, the inquiry mode of LENS is the way that
21 preordering information is obtained.

22 Q Well, does the ordering phase of LENS have an
23 order inquiry function?

24 A There's a status section. There's a way to
25 inquire on the status of an order.

1 Q So if an unbundled loop is ordered through the
2 LENS system, can the ALEC determine the status of that
3 order through the LENS system?

4 A Yes.

5 Q Is there -- in an EXACT -- excuse me. In an
6 order placed for an unbundled loop using the EXACT
7 interface, is there a space on the screen or order form
8 to indicate the customer desired due date?

9 A I have a print of some of the EXACT screens
10 here. I could look. I don't recall the field exactly.
11 (Pause) Yes.

12 Q When an order is placed for an unbundled loop
13 through the EXACT interface, at some point in the
14 process is an FOC returned for the ALEC?

15 A Yes.

16 Q And is that returned electronically?

17 A Yes.

18 Q If we assume that an order for an unbundled
19 loop submitted through the EXACT system is error free,
20 can you describe for me, either using your chart or
21 otherwise, where that order ends up in the BellSouth
22 system? Does it go to LEO?

23 A Through the EXACT system?

24 Q Yes, ma'am.

25 A No.

1 Q Does it go to LESOG?

2 A No.

3 Q Does it go to the SOCS?

4 A Yes.

5 Q Does SOCS then generate the FOC?

6 A Yes.

7 Q And does that FOC, is it electronically sent
8 back so it can be activated and seen by the -- via the
9 EXACT terminal at the ALEC's premises?

10 A Yes.

11 Q How long -- again, assuming an error free
12 order -- should it take for an FOC, for an unbundled
13 loop, to be sent in the EXACT format?

14 A I don't know. As I said earlier, I think that
15 FOCs have -- tend to be a matter of -- have been
16 negotiated and are contractually set.

17 Q Are you aware that BellSouth has committed to
18 SMNI to providing FOCs within 48 hours?

19 A No, I wasn't aware of that.

20 Q Exhibit 48 was the letter from Mr. Baker, the
21 September 2nd, about the problem with the due date that
22 Mr. Melson asked you about.

23 A Excuse me. I'm buried in paper here.

24 Q That's the problem with the LENS firm order
25 mode due date glitch.

1 A Yes.

2 Q And tell me who Mr. Baker is with respect to
3 the BellSouth ALEC relationship.

4 A He is the vice president-sales for
5 interconnection services.

6 Q Is he an appropriate person for BellSouth to
7 make commitments for time periods for FOCs?

8 A I don't know.

9 Q While I've got this out, Exhibit 48, do you
10 know whether BellSouth has determined whether the FOCs
11 that are generated with orders placed in this manner
12 produce a due date that's consistent -- is correct or
13 incorrect?

14 A No. As I said, we just became aware of this
15 problem late Friday afternoon and the investigation is
16 ongoing.

17 Q When were you personally made aware of this
18 problem?

19 A At about 4:30 last Friday afternoon.

20 Q So prior to your making your presentation
21 yesterday afternoon here?

22 A Yes.

23 Q Let me go back to the FOC on the loop order
24 through the EXACT system. Again, assuming an error free
25 order, once it's into the -- gets to SOCS, what can

1 delay the issuance of a FOC once it hits SOCS?

2 A I don't know.

3 Q Once it hits SOCS, is that an entirely
4 mechanized process?

5 A Well, SOCS is a mechanized system. I guess
6 I'm not sure exactly what you're asking me there.

7 Q Is the -- once the order hits SOCS, is the FOC
8 produced without the intervention of any human?

9 A I guess I better say I don't know for sure.

10 Q There's been reference to the term ALEC
11 account teams, in one form or another. Can you tell us
12 what an account team is?

13 A Yes. It's a group of BellSouth employees who
14 are assigned to provide support to an interconnection
15 service's customer and to make sure that customer's
16 needs are met.

17 Q Is there an official BellSouth term that gets
18 assigned an acronym for an account team, or is that the
19 best we have?

20 A An account team.

21 Q And is each ALEC assigned their own account
22 team?

23 A I think it depends on the size of the ALEC. I
24 would say that in all cases there's not a separate
25 account team for each ALEC.

1 Q But the larger ALECs have each been assigned
2 their own account teams; have they not?

3 A As far as I know. And again, we're kind of
4 getting outside the scope of my testimony on the systems
5 in terms of exactly how those account teams are
6 assigned.

7 Q Well, your Exhibit 45, which was your chart
8 about the system that was on this screen yesterday, the
9 last one that I think Commissioner Kiesling asked you
10 about, the busy one. The account team that's shown on
11 here, is that the ALEC account team?

12 A Yes.

13 Q Is the account team part of the LCSC?

14 A No.

15 Q They're independent?

16 A Yes.

17 Q Is one of the purposes of the account team for
18 the ALEC to have a point of contact in dealing with
19 BellSouth for these ordering and provisioning issues?

20 A Yes.

21 Q And is the ALEC -- it would -- let me rephrase
22 it. It is reasonable for the ALEC to rely upon the
23 information that's given it by the account team; is it
24 not?

25 A Yes.

1 Q And that's an appropriate source for an ALEC
2 to refer to for information on the systems that we've
3 been talking about?

4 A It's an appropriate point of contact. I
5 wouldn't say that the account teams are necessarily
6 systems experts themselves, but they're the appropriate
7 people to put the ALEC in contact with the systems
8 experts if that's necessary.

9 Q And do the updates in the manuals come through
10 the LCSC?

11 A No.

12 Q And I notice on Mr. -- Exhibit 48, Mr. Baker's
13 September 2nd letter, his last sentence said if you've
14 got any questions to contact your account manager about
15 this due date issue.

16 A Yes.

17 Q Do you know how many BellSouth personnel are
18 on the Sprint/SMNI account team?

19 A I don't know.

20 Q Do you know how many are on the AT&T or MCI
21 teams?

22 A I don't know.

23 Q Do you know the director of the Sprint account
24 team?

25 A Carol Jarman.

1 Q The LCSC audit letters that -- did you hear
2 Mr. Scheye talking about them?

3 A Yes.

4 Q I think they referred to LCSCs being located
5 in Birmingham and Atlanta. Is Florida -- are the
6 account teams assigned to Florida ALECs located in
7 Atlanta rather than Birmingham?

8 A There are account team personnel in both
9 Birmingham and Atlanta.

10 Q Have you visited the Atlanta or Birmingham
11 locations of the LCSC to observe their operations?

12 A I have visited the Atlanta LCSC. I would say
13 "to observe their operations" is kind of a strong term,
14 or expression.

15 Q For an ALEC to implement the -- one of these
16 systems, say the LENS interface, what I want to ask is:
17 What does an ALEC have to do to implement that system?
18 Do they have to buy -- do they have to have computers
19 available for the operations?

20 A Yes. They would need computers, ordinary
21 personal computer running a software such as a Netscape
22 Navigator, the browser software, as it's generically
23 called, and they would need to establish a connection to
24 the LENS system and obtain user IDs.

25 Q And BellSouth through the LCSC makes available

1 training programs for ALEC personnel to learn how to use
2 the -- for instance the LENS system; is that correct?

3 A Not through the LCSC, but BellSouth does
4 operate a training lab.

5 Q You're aware, are you not, that several of the
6 intervenor witnesses have raised issue with whether the
7 BellSouth interfaces are in a fully tested or fully
8 deployed mode?

9 A Yes.

10 Q And again, with reference to Exhibit 48, the
11 September 2nd letter from Mr. Baker about the due date
12 issue, would you agree that -- I'll call it an issue,
13 problem, whatever we want to call it, that that perhaps
14 is an indication of the types of things that come into
15 play and you discover when these systems are put into
16 actual operation and the pressure of continued use?

17 A No, not necessarily. You can get unexpected
18 results with a system, even if you've been using it for
19 years.

20 Q Let me go back again quickly. The RNS system
21 that BellSouth uses for residential -- its residential
22 system is an integrated ordering and preordering system;
23 is it not?

24 A Yes. It supports both capabilities, although
25 BellSouth does use more than one system simultaneously

1 to accomplish some of those activities. It is typical
2 practice for a BellSouth service rep to be obtaining
3 customer service record information through BOCRIS,
4 simultaneously running RNS, for example, and there are
5 some functions for which a rep who would normally use
6 RNS has to go to DOE. So you can't categorically say
7 that all the functions are integrated all the time.

8 Q Have you observed the -- let me rephrase
9 that. Have you personally observed orders being placed
10 utilizing the LENS system?

11 A Yes.

12 Q And were those test orders?

13 A Yes.

14 Q Have you personally observed orders made in
15 the LENS system at an ALEC premises?

16 A No.

17 Q Or any order where a customer's service was
18 actually converted?

19 A No.

20 Q Mr. Melson did with you a demonstration, I
21 think it was the Norcross, Georgia location, where there
22 was a valid address shown but no living unit. Do you
23 recall that?

24 A Yes.

25 Q If you take the hypothetical perhaps one step

1 further. There's a new subdivision and houses are being
2 built, and a customer calls an ALEC requesting new
3 service and an inquiry is made. Does an ALEC have a way
4 of determining whether there are any facilities --
5 excuse me, inquiry made through the LENS mode -- is
6 there any way for the ALEC to determine whether there
7 are facilities of BellSouth actually running to that
8 residence?

9 A No, not in the inquiry mode of LENS. That
10 information is shown in the -- in the firm order mode of
11 LENS.

12 Q So if an ALEC switches over to the order mode,
13 at what point in that process would that information be
14 displayed?

15 A On the due date screen.

16 Q Is that the final screen?

17 A Yes.

18 Q With respect to all these systems we've been
19 talking about, would you agree that each time there is
20 manual handling or intervention in the processing of
21 orders, that the likelihood of an error is increased?

22 A I don't have any personal knowledge to base
23 that on. It would depend on -- it would depend on the
24 person.

25 Q Well, let me put it this way. Would you agree

1 that your odds increase that an error can occur
2 somewhere in the process when you got people working on
3 it?

4 A In general, yes.

5 Q In the LENS inquiry mode, I believe there's --
6 was there a box there or line for the tax exempt
7 status? Is that in the inquiry mode?

8 A No, that's in ordering entry.

9 Q Does the inquiry mode show the -- for an
10 existing service, the tax exempt status of the
11 customer?

12 A The purpose of -- no. And the purpose of that
13 is not to show the tax exempt status of the end user.
14 It's to show the tax exempt status of the CLEC.

15 Q In the BellSouth system, the RNS system, does
16 it -- or the DOE system in the inquiry mode, show
17 whether the customer -- the customer's tax exempt
18 status?

19 A No, not that I know of.

20 Q I'm sorry?

21 A Not that I know of.

22 Q Where there is an order been placed in the
23 LENS system, is it correct that the only change that can
24 be made in a mechanized form is the change of the due
25 date?

1 A For LENS ordering?

2 Q Yes, ma'am.

3 A Yes.

4 Q And any other changes, additions, whatever
5 that need to be made, you would have to cancel and make
6 a new order?

7 A Yes -- no. No, the changes could also be made
8 by the local carrier service center.

9 Q Can an ALEC call the LCSC the next day if its
10 customer calls back and wants to add call waiting and
11 add it to the order made the day before?

12 A Yes, assuming the order hasn't completed yet.

13 Q Yes, ma'am. We've had various references to
14 the traveling shows going to all the different states.
15 BellSouth is in the process of these 271 proceedings in
16 Georgia, Louisiana, Kentucky, North Carolina,
17 Tennessee? Is that correct?

18 A I'm not sure what the status is, but in many
19 states in the BellSouth region.

20 Q Most if not all of the states?

21 A Right.

22 Q And you've made it clear on several occasions
23 that -- in your disclaimer, that you're not a customer
24 service representative. In any of the proceedings has
25 BellSouth brought as a witness a customer service

1 representative who could answer questions about the
2 actual day-to-day operations and use of the BellSouth
3 systems?

4 A BellSouth has not brought a customer service
5 representative. I have testified about the day-to-day
6 use of the systems. And when I say I'm not a customer
7 service representative, what I am saying is I'm not
8 familiar with each and every ordering code associated
9 with each and every service that BellSouth uses.

10 Q So I think the answer was no?

11 A Well, there were two parts to your question.
12 And the answer was no to the first part and yes to the
13 second.

14 MR. BOYD: Okay. Thank you. That's all I
15 have. Thank you, Chairman.

16 CROSS EXAMINATION

17 BY MR. HORTON:

18 Q Ms. Calhoun, I'm Doc Horton on behalf of
19 ACSI. You are familiar with ACSI from other states?

20 A Yes.

21 Q Mr. -- just to follow up on a couple of things
22 that Mr. Boyd was asking you with regard to the account
23 teams, does ACSI have an account team?

24 A Yes.

25 Q So they would have the same contact regardless

1 of which state they were operating in?

2 A Yes.

3 Q Those account teams are not at the LCSC you
4 say?

5 A Right.

6 Q Is there a point of contact at the LCSC for
7 ALECs? Let me back up.

8 ACSI operates in several different BellSouth
9 states, right?

10 A Yes.

11 Q Would they -- regardless of the state, would
12 they have the same contact, point of contact, at the
13 LCSC, regardless of what state they're operating in?

14 A In general, yes.

15 Q Okay. In general, yes. What --

16 A There are -- as we discussed earlier, there
17 are two physical LCSCs, and the staff in each are
18 dedicated primarily to different carriers. But in order
19 to achieve 24-hour seven-day-a-week coverage, sometimes
20 for a portion of the day, or the night more
21 specifically, they take turns.

22 Q Okay. Do you have a copy of -- it's your
23 response to Item No. 10, AT&T's First Set of
24 Interrogatories, and it is part of what has been
25 identified as Exhibit No. 10, Mr. Varner?

1 A I don't believe I have a copy of that.

2 (Pause)

3 Q Do you have a copy of that now?

4 A Yes.

5 Q Oh, I'm sorry, look at Page 3. You're shown
6 as providing that response to the interrogatories,
7 right, on Page 2?

8 A I am. I think technically they should have
9 said "information sponsored by." I was not the
10 originator of this information.

11 Q Okay, well, you can probably answer my
12 questions, though. I just want to understand, on Pages
13 3 and 4, there appear to be 67 -- 67 lines, and I would
14 assume that there were 67 carriers listed there. That
15 that's been whited out. I suspect that's the
16 proprietary part, agreed?

17 A Yes.

18 Q There's a series of columns there that says
19 "potential" up at the top, and it's got LENS, EDI,
20 EDI PC, EC-Lite and TAFI. And at the top it says
21 "potential."

22 A Yes.

23 Q What does potential mean?

24 A That these are possible users of the various
25 systems, CLECs who have indicated an interest in one of

1 those systems.

2 Q They've expressed an interest, or is this
3 something that you mark is that they're potential users
4 of those systems?

5 A They've expressed an interest.

6 Q And then the next series is headed by "system
7 turn-up."

8 A Yes.

9 Q Okay. And that's coded down at the bottom to
10 indicate various stages of the turn-up activity, with E
11 meaning that the carrier is actively using the system?

12 A Yes.

13 Q I'm reading this right so far?

14 A Yes.

15 Q So under the LENS column, for example, where I
16 see an E, that indicates that that carrier is actively
17 using the system?

18 A Yes.

19 Q Go over to the -- well, EDI column shows one
20 ALEC currently using EDI?

21 A Yes.

22 Q And EDI PC, there's four currently using it?

23 A Yes, as of the date of this report.

24 Q Are all four of those facilities-based, or do
25 you know?

1 A I don't know.

2 Q Earlier --

3 A I was going to amend my answer. I know that
4 at least some of them are not.

5 Q At least some of them are not? Are not
6 facilities-based?

7 A Yes.

8 Q Those others would be resellers?

9 A Yes.

10 Q Maybe I misunderstood the question from
11 Mrs. Rule. Earlier she -- I thought you said that only
12 AT&T was using EDI PC. Did I misunderstand her?

13 A That's when we got into the discussion
14 about -- she was using the term EDI mainframe.

15 Q Okay. Look at the -- go on over on that same
16 response, there's a column called -- says, "in use"?

17 A Yes.

18 Q Go down -- well, never mind. I misread it.
19 "In use," where it says "now" would indicate that the
20 system is turned up for all systems that they may be
21 utilizing, right?

22 A Yes. I'm sorry. Wait a minute. Could you
23 give me that again?

24 Q All right, well go back a page. There it is.
25 I was looking at the wrong page. Look at Page 3.

1 A Yes.

2 Q Line 8.

3 A Yes.

4 Q And that carrier it's got an E for LENS, which
5 means they're actively using it?

6 A Yes.

7 Q An E for EDI, which means they're actively
8 using it?

9 A Yes.

10 Q And a C for TAFI?

11 A Yes.

12 Q And when it says "in use" it says "now." So
13 what does the "now" refer to?

14 A It means that there's a system in use now.

15 Q I'm sorry?

16 A It means that there is a system in use now.

17 Q A system?

18 A Yes.

19 Q Not necessarily all the systems that they may
20 be using?

21 A Right.

22 Q May want to use?

23 A Right.

24 Q That's all on that exhibit. Oh, excuse me.

25 Excuse me. How many -- do you know how many, of the 67

1 entries there, how many of those are facilities-based
2 providers in Florida?

3 A I do not.

4 Q You've indicated several times that Mr. Stacey
5 is more appropriate to ask questions of with respect to
6 the operations of the LCSC; is that right?

7 A No. Mr. Stacey is the performance
8 measurements witness.

9 Q All right. I, as an ALEC, place an order. It
10 goes to the LCSC, correct?

11 A Not necessarily.

12 Q Where else would it go?

13 A Well, for the services we discussed that are
14 orderable via EDI with mechanized order generation, the
15 order would just flow into the service order control
16 system. It wouldn't go to a human on BellSouth's side
17 of the interface at all.

18 Q Okay. A reseller placing an order for an R1,
19 that goes to the LCSC?

20 A No, that would go through the local carrier --
21 excuse me, through the EDI interface through the
22 mechanized order generator and right on into the
23 systems.

24 Q Is that the same process that an order through
25 a BellSouth representative would take?

1 A Yes.

2 Q Just for clarification, you said yesterday
3 during your presentation that, as I recall -- and don't
4 let me misquote you -- but you indicated that the period
5 right after Labor Day was a particularly busy period;
6 there were a lot of closed out dates right after Labor
7 Day?

8 A Yes.

9 Q Does BellSouth ever preprogram -- other than
10 holidays, do they ever preprogram closed dates for a
11 work center or central office?

12 A Yes. There may be a central office switch
13 conversion going on, for example, in ordering activity,
14 and that location would -- there would be a freeze, it's
15 called.

16 Q All right. For -- let's take for other
17 examples, though, when you know that in a particular
18 area -- let's take Gainesville with the return of
19 students. That would be a particularly busy day for
20 Gainesville, Florida as a BellSouth territory; do you
21 agree?

22 A Yes.

23 Q The return of students to Gainesville would be
24 a particularly busy time, I would imagine, for installs
25 of service. Would you agree with that?

1 A I would think so.

2 Q Would BellSouth ever preprogram closed days
3 during that period of time because of the expected
4 requests?

5 A I'm not sure I understand your question.

6 Q If you anticipate -- if you know based on
7 history in your records that there is a busy period for
8 a particular -- I'm trying to make sure I use the right
9 terminology -- for a particular exchange, central
10 office, would you ever close out that for any but
11 specially coded orders or anything? Is there any time
12 when an ALEC would not be able to program installs in an
13 area because you have preprogrammed closing that?

14 A I'm not aware of any such practice, but I'll
15 go back to what I described yesterday, which is that the
16 installation calendar that controls these -- the due
17 dates, is the same installation calendar that applies to
18 BellSouth's retail orders.

19 Q That's all I wanted. Thank you.

20 CHAIRMAN JOHNSON: Staff?

21 CROSS EXAMINATION

22 BY MS. BARONE:

23 Q Good afternoon, Ms. Calhoun. I'm going to ask
24 several questions that might touch on things that you've
25 answered before.

1 A Excuse me. I really don't mean to slow this
2 process down, but if I could have a two-minute break, I
3 would be much obliged.

4 CHAIRMAN JOHNSON: Okay, we'll -- how long do
5 you need?

6 WITNESS CALHOUN: Two minutes.

7 CHAIRMAN JOHNSON: We'll go ahead and take our
8 break for 15 minutes.

9 WITNESS CALHOUN: Thank you.

10 (Recess from 4:37 p.m. until 5:02 p.m.)

11 CHAIRMAN JOHNSON: We're going to go back on
12 the record. Are there any preliminary matters?

13 MR. HATCH: Madam Chairman, I just wanted to
14 advise that we've agreed to stipulate Dr. Kaserman's
15 testimony and we can take care of the entry and
16 everything later.

17 CHAIRMAN JOHNSON: Thank you very much for
18 putting us on notice.

19 We were -- where were we? Staff.

20 MS. BARONE: Thank you.

21 Q (By Ms. Barone) Ms. Calhoun, would you
22 identify the different functions that are available in
23 the LENS preordering mode, please?

24 A Yes. Address validation, telephone number
25 selection, product and service information, due date

1 information and customer service record information.

2 Q Which of these functions are available in the
3 firm order mode?

4 A All of them.

5 Q And which of them are available in the EDI
6 ordering mode?

7 A None. EDI is an ordering interface.

8 Q So is the information accessed in the LENS
9 preordering mode -- let me rephrase that. So the
10 information accessed in the LENS preordering mode cannot
11 automatically populate the appropriate fields in the
12 LENS firm order mode; is that correct?

13 A No. The firm order mode has all of the
14 preordering functions contained in the firm order mode,
15 and those populate the firm order in LENS.

16 Q I understand, but if an ALEC wants to enter --
17 they want to enter items in the preordering mode -- say,
18 for example, they just want to put an address and
19 telephone selection, et cetera, that information has to
20 be cut and paste in order to be put in the ordering
21 mode; is that correct? It can't automatically flow from
22 the preordering mode into the ordering mode, correct?

23 A That's right. But there's no need to do it
24 the way you've described, because all that preordering
25 functionality is also in the firm order mode. So you

1 can just start in the firm order mode and do those same
2 things.

3 Q If you put that information into the LENS firm
4 order mode, you cannot save that information and come
5 back to it later that day, can you?

6 A No.

7 Q Now, RNS has the ability to combine the
8 capabilities of preordering and ordering; isn't that
9 correct?

10 A Yes.

11 Q Ms. Calhoun, would you please turn to Exhibit
12 No. 45 that was identified earlier and look at Page 2,
13 please?

14 A Is that the one that's marked ID No. GC-33?

15 Q No, that is the -- the front page of that says
16 Demonstration of Electronic Interfaces that was
17 identified as Exhibit No. 45.

18 A Oh, okay.

19 Q If you'll look at Page 2.

20 A Yes.

21 Q It helps me to be able to visualize things.
22 So what I would like you to do for me is imagine you're
23 putting a template over the CLEC OSS access section that
24 you have there, where you have the CLEC and then the
25 EDI, and it shows the process that an order goes

1 through.

2 What I would like to do is for you to explain
3 to me the BellSouth RNS ordering process. And if you'll
4 just point out to me where the databases are different
5 and show me the steps that an order goes through.

6 A Okay.

7 Q Or explain to me the steps that an order goes
8 through through RNS. So, for example, you have on the
9 left, CLEC, that's BellSouth, and it goes into RNS.
10 What happens after that?

11 A There's -- it goes to a navigator, and where
12 you see LEO, there's a system called FUEL. Where you
13 see LESOG, there's a system called SOLAR. And the LCSC
14 is not involved.

15 MR. ELLENBERG: For the sake of the record,
16 could you spell those two acronyms for the court
17 reporter, please.

18 WITNESS CALHOUN: Yes. FUEL, F-U-E-L. SOLAR,
19 S-O-L-A-R.

20 Q (By Ms. Barone) And for the record, would you
21 state what those acronyms stand for, please?

22 A Yes, FUEL is what I would call a nesting
23 acronym. It stands for FID, USOC and Edit Library. And
24 FID is field identifier, and USOC, of course, is uniform
25 service order code. And SOLAR stands for service order

1 layout assembly routine.

2 Q All right, now will you walk me through the
3 process for those changes?

4 A Yes. The BellSouth service rep would put the
5 order in through RNS, and RNS would communicate through
6 the navigator contracts with FUEL and SOLAR, and the
7 ultimate order would be generated to SOCS, or the
8 service order control system.

9 Q So the navigator communicates with FUEL and
10 SOLAR at the same time?

11 A Yes.

12 Q And LESOG -- what does LESOG do and why is
13 that not necessary in this situation, in RNS?

14 A LESOG is the local exchange service order
15 generator, and its function is analogous to the SOLAR
16 system. They're both mechanized order formatters. And
17 FUEL is analogous to LEO.

18 Q And why -- I'll strike that.

19 Now would you go through the same process
20 explaining DOE for me?

21 A Yes. The BellSouth service representative
22 would input a service order into DOE. DOE would
23 communicate with a system called SOER, S-O-E-R, service
24 order edit routine, that performs functions analogous to
25 LEO and to FUEL, and then the order would ultimately be

1 put into SOCS.

2 Q BellSouth customer service representatives
3 have the ability to access pending orders in the RNS
4 system; isn't that correct?

5 A Yes.

6 Q Is this also true in the DOE system?

7 A Yes -- well, yes, yes, it's true in both.

8 Q After accessing a pending order, a BellSouth
9 representative can make modifications to the original
10 order by accessing an order update screen; isn't that
11 correct?

12 A Yes.

13 Q When moving from one screen to the next in
14 RNS, the customer information initially validated in the
15 system automatically populates the same fields in later
16 screens; isn't that correct?

17 A I'm sorry, could you repeat the first part?

18 Q When you move from one screen to the next in
19 RNS?

20 A Yes.

21 Q The customer information initially validated
22 in the system automatically populates the same fields in
23 later screens; doesn't it?

24 A Yes.

25 Q RNS and DOE have on-line credit capability;

1 isn't that correct?

2 A RNS does. RNS has a link to Equifax. I don't
3 believe DOE has that. RNS has a link that -- where you
4 can launch a query to Equifax, I don't believe that DOE
5 has that.

6 Q But you're not sure if DOE has that
7 capability?

8 A I'm not sure. I'm not totally sure.

9 Q And RNS and DOE have on-line edit capability;
10 don't they?

11 A Yes.

12 Q If an error is made by a BellSouth customer
13 service associate, a rejection notice is typically sent
14 back to the customer service associate within 30 minutes
15 by BellSouth's downstream representative; isn't that
16 correct?

17 A It's not necessarily sent back to the
18 originator of the order. There's an error handling
19 group that gets error notifications.

20 Q Is that notification typically within 30
21 minutes?

22 A I would have to check on that. That sounds
23 like a reasonable time frame, but I can't verify it for
24 sure.

25 Q In the products and services section of RNS,

1 an options button appears beside the product or service;
2 doesn't it?

3 A Yes.

4 Q The option button allows the BellSouth
5 customer service representative to know if the
6 promotions exist for the service being selected; isn't
7 that correct?

8 A Yes, that's correct, but promotion information
9 is considered marketing information. It wasn't
10 identified as preordering information by the FCC or in
11 the arbitrations, or in any place where preordering
12 information has been defined.

13 Q In RNS the BellSouth customer service
14 representative can access an order's summary screen
15 which shows what the customer has ordered so the
16 representative can confirm the entire order with a
17 customer; isn't that correct?

18 A Yes.

19 Q RNS has a hold order button that allows orders
20 to be held for up to 30 days; isn't that correct?

21 A Yes.

22 Q BellSouth customer service representatives can
23 move to and from the DOE system from the RNS system with
24 no time-out delays; isn't that correct?

25 A Yes. They can run both systems

1 simultaneously.

2 Q How does RNS distinguish which fields must be
3 filled in? How would the service representative know
4 that they must fill in particular field codes in fields?

5 A There's a way of indicating it. I can't
6 recall whether it's highlighting or color, particular
7 color.

8 Q Would you agree, subject to check, that those
9 fields that must be filled in are separated by a line
10 between those that do not have to be filled in?

11 A Yes.

12 Q In DOE the products and services that can be
13 selected are highlighted; isn't that correct?

14 A No. There's a message that appears at the
15 bottom of the DOE screen that indicates that just
16 because a product is highlighted doesn't mean it's
17 necessarily available.

18 And the other part of your question was: Can
19 a product be selected? And in DOE, if by selection you
20 mean can you point and click at it? No, you can't do
21 that at all in DOE. You have to enter a code.

22 Q No. What I mean by that is that in DOE, for
23 those products that can actually be not selected with a
24 pointer, per se, but they can actually be ordered or
25 highlighted or shadowed.

1 A Again, I typically see a message on the screen
2 that says just because it's highlighted doesn't mean
3 it's available. You have to check.

4 Q RNS uses the information from existing
5 customer's CSR to populate the correct fields in RNS
6 when a BellSouth customer is making a change to his or
7 her existing service; isn't that correct?

8 A Yes.

9 Q In DOE the USOC code automatically appears
10 next to the corresponding product or service being
11 selected; isn't that correct?

12 A Yes.

13 Q Do ALECs have the ability to access pending
14 orders in the LENS or EDI systems?

15 A No, not in the LENS system. In the EDI system
16 they can change pending orders.

17 Q And what do you mean they can change pending
18 orders?

19 A They can issue an order to make changes to a
20 pending order.

21 Q Do they have the ability to access those
22 orders through EDI?

23 A Are you asking can they pull them up in
24 BellSouth's system via EDI?

25 Q Yes.

1 A No.

2 Q Can ALECs customize the LENS and EDI systems
3 for their own specific need? So for example, can an
4 ALEC add an options button next to each product or
5 service in the LENS or EDI system which would allow an
6 ALEC customer service representative to click on the
7 options button?

8 A Yes. As I described yesterday, the purpose of
9 EDI is to define how information -- the formats in which
10 information should be exchanged. But the ALEC is
11 totally free to design its system on its side of the
12 interface in any way that makes the most sense to them.

13 Q I think you've already stated this, but LENS
14 or EDI don't have the capability to hold orders for up
15 to 30 days; isn't that correct?

16 A LENS does not. EDI, you know, as we saw
17 earlier, the CLEC has the choice -- it's up to them when
18 they submit the order to us, and they can create the
19 order in their system and send it to us when they
20 choose.

21 And that same question really kind of applies
22 to your earlier question about pending orders. They
23 don't have the ability to pull up and view the order as
24 it exists in our system. They have the ability pull it
25 up and view it as it exists in their system, as they've

1 sent it to us.

2 Q Are all of the fields that must be populated
3 in LENS and EDI distinguished in some way so that the
4 ALEC customer service representative knows that it must
5 populate the field before the order is processed?

6 A They are in the EDI.

7 Q But not in LENS?

8 A Yes.

9 Q And how are they distinguished in EDI?

10 A With an asterisk.

11 Q Earlier when you were referring to Exhibit
12 No. 45, you discussed FUEL. Now FUEL is the database
13 that BellSouth uses for its retail operations; isn't
14 that correct?

15 A Yes.

16 Q And LEO is the database that ALECs use for
17 ordering, correct?

18 A Yes.

19 Q Are there any differences between the FUEL and
20 LEO databases?

21 A I don't know. I would not be able to identify
22 them.

23 Q Do they serve the same functionality, or are
24 there different functionalities involved?

25 A Generally they serve the same functionality.

1 Q What do you mean generally?

2 A I mean in general they are intended to provide
3 the same functions, but I can't give you a side-by-side
4 listing of exactly how things are accomplished in each.
5 But in general they serve the purpose of checking
6 business rules, checking that USOCs are valid, that a
7 USOC that belongs with a particular -- that a USOC
8 belongs with a particular class of service and they're
9 doing content checking.

10 Q What's the difference between LESOG and SOLAR?

11 A Well, again, technically they're different.
12 Functionally they're equivalent. They are -- both of
13 them perform the task of manually converting the inputs
14 from the presentation system into codes and formats that
15 are recognized by SOCS.

16 Q What other databases were created to serve
17 ALECs that BellSouth does not use?

18 A I can't think of any offhand.

19 Q How does an ALEC know what its customers will
20 pay for the services ordered? Does LENS or EDI have
21 this capability?

22 A Well, no, pricing information is something
23 that's at the discretion of each ALEC. So the EDI and
24 LENS system are going to offer the same capabilities to
25 all ALECs, and then it's up to them to determine how

1 they price, package, promote, market their services.

2 Q RNS displays billing record information,
3 correct?

4 A Billing record information?

5 Q Yes.

6 A Yes.

7 Q And RNS displays the rate for the service and
8 calculates the taxes for that service; isn't that also
9 correct?

10 A That's correct.

11 Q Now, this functionality isn't currently
12 available for ALECs today; is it?

13 A It is not part of -- it's not part of the EDI
14 ordering interface. Again, pricing, promotion,
15 packaging, how a CLEC offers its services to its
16 customers is not something over which BellSouth has any
17 control. It's at the discretion of the CLEC. And a
18 CLEC can choose, using the industry standard ordering
19 method, to organize information on its side of the
20 interface in whatever way suits its pricing or marketing
21 objectives.

22 Q Ms. Calhoun, in RNS can a BellSouth service
23 representative see all the NXXs associated with valid
24 addresses?

25 A Yes. I found that answer at lunchtime, and it

1 is possible for them to do that, and they would access
2 that information through the telephone number selection
3 screen.

4 Q I don't think you need to refer to this, but
5 if you do I'll stop after I ask the question. In
6 Late-filed Exhibit No. 2 you provide average talk times
7 for BellSouth service representatives.

8 Are these average intervals based on service
9 representatives using RNS? That's going to be your
10 Late-filed Exhibit No. 2 and that's part of what has
11 been identified as Exhibit No. 43. And you can find
12 that on Page 381.

13 A This includes business and residential. So it
14 will include both RNS and DOE.

15 Q One last question. Why did BellSouth create
16 separate databases for ALECs instead of allowing ALECs
17 direct access to the same databases that BellSouth uses
18 for its retail services, retail operations?

19 A Well, there are a couple different reasons for
20 that. One is, of course, as I've talked about at
21 length, the industry recommends EDI for ordering, and so
22 BellSouth made available an EDI ordering interface, but
23 another reason is that BellSouth has an RNS system for
24 residence customers, and a DOE system for business
25 customers in four states, and a SONGS system for

1 business customers in five states, and we had clear
2 indications from the CLECs that they wanted a single
3 interface that would support both business and residence
4 throughout the region. And in fact, there's language in
5 the MCI interconnection agreement that -- in which we
6 specifically agreed that we would not have separate
7 processes for business and residence customers. And so
8 we needed to provide a single, unified interface.

9 Q I just have a follow-up to that then. Why did
10 BellSouth create LEO and why did BellSouth create LESOG?

11 A FUEL and SOLAR are databases that are only
12 associated with residence customers -- with RNS, which
13 only supports residence customers. And so again,
14 because both CLECs, as our customers, told us they
15 wanted a single interface, we needed to have databases
16 performing those functions that would support both
17 business and residence customers, and because we're
18 contractually obligated to provide a single interface
19 for business and residence.

20 MS. BARONE: Thank you. That's all I have.

21 COMMISSIONER CLARK: Madam Chairman, I would
22 just like to ask one question.

23 With respect to your direct testimony -- and I
24 probably should have asked Mr. Varner the same thing,
25 but hopefully you can answer it. You take issue with

1 the fact that DOJ has apparently commented on your
2 OSS -- your operational support systems; is that
3 correct?

4 WITNESS CALHOUN: Yes.

5 COMMISSIONER CLARK: I'm on Page 5 of your
6 direct. But the purpose of the OSS systems is to ensure
7 that competing carriers are able to perform the
8 functions of preordering, ordering, provisioning,
9 maintenance and repair in substantially the same time in
10 order for them to fairly compete; is that correct?

11 WITNESS CALHOUN: In order to give them a
12 meaningful opportunity to compete, yes.

13 COMMISSIONER CLARK: Fair competition; is that
14 right?

15 WITNESS CALHOUN: Yes.

16 COMMISSIONER CLARK: That's what the order
17 says?

18 WITNESS CALHOUN: Yes.

19 COMMISSIONER CLARK: What do you understand
20 antitrust issues to be?

21 WITNESS CALHOUN: First of all, let me say
22 that I was primarily referring to Mr. Varner's testimony
23 here, but just let me try to answer that as best I can.
24 My understanding of antitrust issues -- and again I'm
25 not a lawyer -- are things related to -- primarily to

1 economics, market dominance and cost, and that sort of
2 thing. And, you know, what I was trying to say here is
3 that in my layperson's understanding of the
4 Telecommunications Act, there was no particular role
5 given to the Department of Justice in terms of
6 evaluating operational support systems. But as --

7 COMMISSIONER CLARK: There wasn't a role?

8 WITNESS CALHOUN: No, not directly, but that
9 as I understand it, Congress did intend for the FCC to
10 consult with the state commissions about that type of
11 issue. And all I was trying to say here -- and again, I
12 think Mr. Varner probably spent more time on this -- was
13 that the DOJ's opinion shouldn't preclude a state
14 commission from evaluating those issues and reaching its
15 own conclusion.

16 COMMISSIONER CLARK: Shouldn't preclude us
17 from reaching a different view than what they did?

18 WITNESS CALHOUN: Right.

19 COMMISSIONER CLARK: Maybe I should ask
20 Ms. White or any of the other attorneys. I would like
21 to know if you can cite me in the Act where it outlines
22 what it is the FCC is supposed to do -- I'm sorry, DOJ.
23 I would like to know what you're relying on in the Act.
24 Thanks.

25 MS. WHITE: We can do that.

1 CHAIRMAN JOHNSON: Any other questions,
2 Commissioners? Redirect?

3 MR. ELLENBERG: Just a few questions, thank
4 you, Chairman Johnson.

5 COMMISSIONER DEASON: I'm sorry, I did have
6 one question, if you'll give me that opportunity. Is
7 there anything within the systems to prevent slamming of
8 local service, other than someone just clicking yes that
9 they're authorized to access the system and make the
10 entry that they're making?

11 WITNESS CALHOUN: No. That was part of the
12 issue that we discussed during the arbitrations, and I
13 think what we had settled on was the blanket letter of
14 authorization. And so the system doesn't prevent anyone
15 from accessing records or from switching a customer, but
16 the system does keep, at the system level, what we call
17 a footprint in the customer's record so that should
18 information become -- should it become necessary to do
19 some kind of audit or investigation, that information
20 could be extracted and made available to a commission.

21 CHAIRMAN JOHNSON: Redirect?

22 REDIRECT EXAMINATION

23 BY MR. ELLENBERG:

24 Q Ms. Calhoun, would you look at your Exhibit
25 GC-19 to your direct testimony, please?

1 A Yes.

2 Q Mr. Melson asked you a number of questions
3 about what the 30 services on this exhibit represent.
4 Do you recall those questions?

5 A Yes.

6 Q And I recall as part of your answer you
7 indicated that the revenues from these 30 services
8 represented 90 plus percent of BellSouth's retail
9 revenues; is that correct?

10 A Retail revenue for residence and small
11 business, yes.

12 Q Why is that important?

13 A Well, I think it gets to the question about
14 ALECs having a meaningful opportunity to compete. It
15 shows that we have mechanized the ordering process, as
16 well mechanized the processes on BellSouth's side of the
17 interface for most of the services that retail customers
18 are interested in and order often.

19 Q And I believe you indicated that of the
20 remaining percentage, approximately 10 percent of the
21 revenues, a large portion of that would be complex
22 services; is that correct?

23 A The complex services wouldn't necessarily
24 apply to the small business or the residence market. We
25 had talked about upwards of 80 percent of the total

1 market, and a big chunk of that is the complex services.

2 Q Okay. Now later in the morning, Mr. Melson,
3 during the course of the demonstration, I believe while
4 we were selecting a telephone number, asked you if your
5 proxy service representative had just made a note of a
6 telephone number. Do you recall that?

7 A Yes.

8 Q Now over the past several months have you had
9 a chance to observe BellSouth's retail customer service
10 reps interacting with customers?

11 A Yes.

12 Q Have you had a chance to see BellSouth's
13 retail reps making notes of telephone numbers and other
14 information?

15 A Yes. As a matter of fact, that's the first
16 thing they routinely do when a customer calls in, they
17 write down on a note pad the customer's name and
18 telephone number and sometimes the address so they have
19 that information to refer to in case they have to move
20 from one system to another.

21 Q And Mr. Melson had asked you about the ability
22 of a BellSouth retail rep to access the NXX codes
23 available in a particular office. And I believe in
24 response to a Staff question you've answered that in
25 part. I believe your answer was that it is possible for

1 a retail rep to access that information; is that
2 correct?

3 A Yes.

4 Q Can you tell us how that is done?

5 A Yes. They go to the telephone number
6 selection screen and press a button next to exchange, or
7 click on something that asks for those. And then a
8 window appears with those provided.

9 Q Now would you refer to your Exhibit GC-6,
10 please?

11 A Yes.

12 Q Can you tell us what that is?

13 A Yes. It's a print of a telephone number
14 selection screen from LENS.

15 Q In the middle of the page, do you see the
16 caption "Special Number Pattern: NXX"?

17 A Yes.

18 Q And what is that?

19 A That's a place where you can put in a special
20 number that you might be looking for, and if you're only
21 interested in a particular NXX, you can put just that
22 in.

23 Q So using this field you could determine very
24 quickly whether a particular NXX code was available in
25 the office serving the customer?

1 A Right. I think in the example Mr. Melson
2 used, what was shown was 447, and I think he wanted to
3 know what if the customer said 441. He could just put
4 441 in here.

5 Q Now, Mr. Melson also handed you a document
6 which was marked as Exhibit 47. Do you still have a
7 copy of that?

8 A I guess I'm kind of slow on the exhibit
9 marking system here. So if you could just tell me what
10 it's called.

11 Q This had a number at the top, 974518, and this
12 was I think represented to be a LENS order.

13 A Yes.

14 Q Do you have a copy of that now?

15 A Yes.

16 Q Would you care to mark it Exhibit 47?

17 A I will. Thank you.

18 Q Now, as I recall, Mr. Melson asked you
19 questions from this document. And the thrust of those
20 questions was that this is an order for a conversion of
21 a customer from BellSouth to an ALEC, and also an
22 addition of a feature to that customer's account. Do
23 you recall that?

24 A Yes.

25 Q And I believe the suggestion was that the due

1 date should have been the same date the order was
2 passed, but it was indeed later. Do you recall that?

3 A Yes.

4 Q And at that point you made reference to a
5 letter that described some unexpected results that
6 BellSouth had observed in the due date calculation in
7 LENS. Do you recall that?

8 A Yes.

9 Q Now, if you did not number the exhibits, I may
10 have to help you again. Do you have Exhibit 46 in front
11 of you?

12 A Is that the due date calculation letter?

13 Q Dated June 16th, 1997 from Joe Baker.

14 A Yes, I have that.

15 Q Would you look at the first page of that
16 exhibit, please?

17 A Yes.

18 Q And just to recall what this document
19 transmits, it is the standard business rules intervals
20 that ALECs can expect with different types of orders; is
21 that correct?

22 A Yes.

23 Q Now, look at the middle paragraph on Page 1 of
24 this exhibit.

25 A Yes.

1 Q Beginning with the word -- second -- the third
2 sentence actually, beginning with the word "as." Could
3 you read that please?

4 A "As with all service provisioning requests,
5 these target intervals assume normal working conditions,
6 including safety, load, weather and availability of
7 equipment and facilities."

8 Q In that sentence, what does "load" refer to?

9 A Means the volume of activity occurring in a
10 particular location.

11 Q Now refer back to Exhibit 47, the order. What
12 was the day that this order was developed?

13 A That -- the date showing at the bottom of this
14 print is September 2nd. That's not a LENS date, but
15 that's the date on this page.

16 Q If you would, look to the next to the last
17 page of the Exhibit 47.

18 A Yes.

19 Q Do you see the desired due date?

20 A Yes.

21 Q That is also September the 2nd?

22 A Yes.

23 Q When was September the 2nd?

24 A It was the day after Labor Day.

25 Q And for BellSouth purposes, what is the day

1 after Labor Day?

2 A It is our busiest day of the year.

3 Q And what relationship would that have to
4 particular load that BellSouth might be experiencing?

5 A Well, it would certainly have an impact on
6 load.

7 COMMISSIONER CLARK: What do you do to gear up
8 for that, so that you don't -- so that you don't --
9 well, let me put it a different way.

10 What effort do you make so that you can
11 accommodate as many people who want to have their phone
12 hooked up on that day as can be done? Is there just no
13 way to do that?

14 WITNESS CALHOUN: Well, I know from a systems
15 perspective that change activity to the systems is
16 minimized, and unless there's something that's an
17 absolute emergency, I mean it -- everything is done to
18 try to minimize any non-essential activity occurring on
19 peak days like that.

20 COMMISSIONER CLARK: How do you get to have
21 your service done on that day? Do you have to call
22 months in advance?

23 WITNESS CALHOUN: Well, I don't know.

24 Q (By Mr. Ellenberg) Now Mr. Melson also asked
25 you to conduct a demonstration of certain functions in

1 the LENS system. Do you recall that?

2 A Yes.

3 Q And at one point, I believe, while you were
4 validating an address in order to select a -- excuse me,
5 in order to view the installation calendar in LENS, we
6 saw a message that said, "Application has generated an
7 exception." Do you recall that?

8 A Yes.

9 Q Now if you would, refer to Exhibit 45. And
10 those are the prints from your demonstration yesterday
11 afternoon.

12 A Yes.

13 Q Looking at Page 1 at the bottom of the page,
14 there is a slide caption CLEC OSS Access?

15 A Yes.

16 Q And to the far right there is a block with
17 R-S-A-G, RSAG. We've had a number of discussions about
18 that, but could you just remind us what RSAG is?

19 A It's the Regional Street Address Guide. It's
20 the database used to perform address validations, like
21 we were trying to do this morning.

22 Q I believe Mr. Willingham asked you this
23 question, but just in case, is RSAG used by BellSouth,
24 or accessed by BellSouth's retail reps, as well as
25 CLECs?

1 A Yes.

2 Q Now if RSAG, that database was off line, would
3 that cause LENS to generate the message that it did
4 during the morning session?

5 A Yes.

6 Q And if RSAG were off line, would that affect
7 BellSouth's retail operations as well as ALEC
8 operations?

9 A Yes.

10 Q And do you know whether RSAG was off line for
11 any portion of this morning?

12 A Yes. As a matter of fact, the mainframe
13 system that serves Georgia was in fact down for a couple
14 of hours this morning, affecting not only RSAG but some
15 other major BellSouth databases as well, and made those
16 databases inaccessible by our retail systems as well as
17 the ALEC systems.

18 Q Now, Mr. Boyd asked you questions about
19 whether BellSouth had offered the testimony of any
20 customer service rep in any other state or here in
21 Florida to talk about BellSouth's retail systems. Do
22 you recall those questions?

23 A Yes.

24 Q There are a number of exhibits attached to
25 your prefiled direct testimony and a number of those

1 exhibits are screens from the RNS and DOE systems; isn't
2 that right?

3 A Yes.

4 Q And what is the purpose of having those
5 exhibits to your prefiled testimony?

6 A The purpose of those is to show that BellSouth
7 has made available the information and functions in its
8 databases to CLECs or to ALECs in substantially the same
9 time and manner that BellSouth has those functions
10 available to itself for its retail customers.

11 MR. ELLENBERG: Thank you, Ms. Calhoun.
12 Commissioners, that's all I have.

13 MR. MELSON: Commissioner Johnson, I've got,
14 if I could, three recross on things that came out during
15 redirect.

16 CHAIRMAN JOHNSON: Go ahead.

17 RECROSS EXAMINATION

18 BY MR. MELSON:

19 Q Ms. Calhoun, turn back, if you would, to your
20 Exhibit GC-6, and I believe you were directed to the
21 special number pattern block in the middle of the page.
22 Do you see that?

23 A Yes.

24 Q If the customer had not requested a specific
25 NXX, but instead had said, "What other NXXs are

1 available in this office?" would you have to try 998
2 different numbers in there to find out which ones were
3 available?

4 A I'm not sure what the basis of the 990 numbers
5 is, but this system would not display every NXX that's
6 available.

7 Q You would have to check one at a time?

8 A Yes.

9 Q All right. With regard to Exhibit 46 and 47,
10 which were the order placed through LENS on September
11 2nd and the intervals, does load in a particular office
12 affect the in-by-3/out-same-day rule for functions that
13 are only switch translations, or is that process
14 entirely mechanized?

15 A The process is entirely mechanized, but load
16 in the office could have a potential impact. There
17 could be a switch conversion going on. I don't know
18 what the circumstances -- I don't know what the
19 circumstances around this particular order are.

20 Q Is it just as likely that it is symptomatic of
21 the problem that the CLECs were advised of by a letter
22 on September 2nd?

23 A They're both possibilities.

24 Q Finally, I understand RSAG was down for a
25 while this morning in Georgia?

1 A Yes.

2 Q Is that a reason that an ALEC might want to
3 obtain from BellSouth its own download of the RSAG
4 database so that it could run that database on its own
5 computer system?

6 A I don't know.

7 MR. MELSON: That's all I had. Thank you.

8 CHAIRMAN JOHNSON: Re-re?

9 MR. ELLENBERG: Very briefly, thank you.

10 FURTHER REDIRECT EXAMINATION

11 BY MR. ELLENBERG:

12 Q Back to GC-6, Ms. Calhoun, and the reference
13 to the special number pattern NXX. Is it possible for
14 an ALEC to simply build a table, either physical table
15 or electronic table, of NXX codes available in given
16 central offices?

17 A Yes. That would be possible. And I think
18 another thing to consider here is that I am not aware of
19 any great demand for customers to tell me all the
20 possible combinations of three numbers that my telephone
21 number could start with. If they're asking for a
22 specific NXX, it's usually because they're interested in
23 a particular one, which was the example that Mr. Melson
24 gave this morning.

25 MR. ELLENBERG: That's all I have. Thank

1 you.

2 CHAIRMAN JOHNSON: Exhibits?

3 MR. ELLENBERG: Move 41 and 42.

4 MS. BARONE: Staff moves 43 and 44.

5 MR. MELSON: MCI moves 45, 46, 47 and 48.

6 MS. RULE: AT&T moves 49 and 50.

7 (Exhibit Nos. 41, 42, 43, 44, 45, 46, 47, 48,
8 49 and 50 received into evidence.)

9 CHAIRMAN JOHNSON: Any other matters for this
10 particular witness?

11 You're excused. Long day.

12 (Witness Calhoun excused.)

13 * * *

14 MR. ELLENBERG: Commissioner Clark, if I may,
15 this is William Ellenberg for BST.

16 The statutory authority for BellSouth's
17 position on the DOJ's role is on Section 271,
18 271(d)(2)(A).

19 COMMISSIONER CLARK: What's that say? Is it
20 long?

21 MR. ELLENBERG: Pardon me?

22 COMMISSIONER CLARK: Is it long?

23 MR. ELLENBERG: I can read it.

24 COMMISSIONER CLARK: Okay.

25 MR. ELLENBERG: "Consultation with the

1 Attorney General. The commission shall notify the
2 Attorney General promptly of any application under
3 paragraph 1. Before making any determination under this
4 section, the commission shall consult with the Attorney
5 General. And if the Attorney General submits any
6 comments in writing, such comments shall be included in
7 the record of the commission's decision. In consulting
8 with and submitting comments to the commission under
9 this paragraph, the Attorney General shall provide to
10 the commission an evaluation of the application using
11 any standard the Attorney General considers
12 appropriate. The commission shall give substantial
13 weight to the Attorney General's evaluation, but such
14 evaluation shall not have any preclusive effect on any
15 commission decision under paragraph 3."

16 That paragraph, in conjunction with the
17 legislative history, is the foundation for the
18 position.

19 COMMISSIONER CLARK: Thank you.

20 MS. WHITE: Madam Chairman, I do have one
21 housekeeping matter before we move on to the next
22 witness. BellSouth has its responses to late-filed
23 hearing Exhibits 29, 30 and 31 that it will hand out to
24 the parties now.

25 No. 29 is proprietary because it does include

1 information about all the ALECs with regard to physical
2 collocation. But they will be given to the attorneys
3 for the parties under the protective order that you
4 signed.

5 CHAIRMAN JOHNSON: Okay.

6 MS. KAUFMAN: Chairman Johnson, I have two
7 matters I would like to bring up at this time if I
8 might.

9 The first is I would like to ask the
10 Commission to take official recognition of an FCC order
11 that was entered on August 18th, 1997. It's generally
12 referred to as the Shared Transport Order, and I have
13 copies available for the parties if anybody needs one.

14 CHAIRMAN JOHNSON: It's referred to as the
15 Shared --?

16 MS. KAUFMAN: Shared Transport Order.

17 The second matter I have --

18 MS. WHITE: Excuse me. Before we move on,
19 could we ask what the relevance of the Shared Transport
20 Order is?

21 MS. KAUFMAN: Yes. It's referred to in the
22 Ameritech order and relied on in that order.

23 MS. WHITE: Thank you.

24 CHAIRMAN JOHNSON: Any objections to us taking
25 official recognition of that? Seeing none, we'll --

1 MS. BARONE: Madam Chairman, I think we might
2 have that on our list. We have nine pages. If you can
3 give me the --

4 MS. KAUFMAN: I apologize, Ms. Barone, if it's
5 already on there. I didn't see it.

6 MS. BARONE: That's fine. Do you have the
7 order number so I can check? Actually, if you'll look
8 on Page 8 of our Official Recognition List we'll see if
9 we have the same one.

10 MS. KAUFMAN: My quick review, I don't see
11 it. It's 96-98 -- I'm sorry it is, it's No. 3. As long
12 as that's the one that was issued on August 18th, 1997.

13 MS. BARONE: If it's the same order number it
14 should be.

15 MS. KAUFMAN: All right. Sorry.

16 The second matter that I wanted to bring up, I
17 almost hesitate to do it given what I said this morning,
18 but I'm going to assume that Mr. Gillan is going to take
19 the stand tomorrow. And what I wanted to do is I want
20 distribute an exhibit that he's going to be using when
21 he takes the stand.

22 And just by way of brief explanation, what it
23 is is it takes his testimony and it essentially
24 annotates it to the Ameritech order. And you may
25 recall, Chairman Johnson, in one of the status

1 conferences that we had, we requested permission that
2 the parties be able to refer to the Ameritech order to
3 the extent that it was relevant to the testimony that
4 they had already filed.

5 So what we've done, to facilitate his summary
6 and to move us along, is he has taken the Ameritech
7 order, which has already been officially recognized, in
8 his testimony and he has annotated the two. The reason
9 I want to pass it out today is to give the parties, to
10 the extent they want to review it and prepare for
11 cross-examination, the opportunity to do that.

12 CHAIRMAN JOHNSON: Okay.

13 MS. KAUFMAN: Thank you.

14 CHAIRMAN JOHNSON: On tomorrow's list, we
15 have -- the only witness that stated that they had
16 to -- that tomorrow was the only day available was
17 Wood?

18 MR. MELSON: Mr. Wood, yes, ma'am.

19 CHAIRMAN JOHNSON: But I'm sure we're going to
20 get to Gillan also, but --

21 MS. BARONE: Madam Chairman, while they're
22 doing that, I would also like to bring to the parties'
23 attention that I intend on moving Exhibits 29, 30 and 31
24 into the record at some point, and I wanted to be able
25 to give the parties an opportunity to lodge any

1 objections. But I understand that Mr. Scheye will need
2 to come back on the stand to address these. So if you
3 want to review those before I move them into the record,
4 or if you can -- that will be -- I just wanted to let
5 you know that.

6 COMMISSIONER CLARK: Madam Chairman, could you
7 for my benefit tell me what the order of witnesses is
8 likely to be tomorrow?

9 CHAIRMAN JOHNSON: If we finish Stacy tonight,
10 then I think we'll have the opportunity to stay in order
11 with Gillan and then Wood. And if we don't finish Stacy
12 tonight, we'll start with Stacy. And the only ones that
13 may get flipped is Gillan and Wood, just to make sure we
14 get Mr. Wood in tomorrow.

15 COMMISSIONER KIESLING: Have we gotten any
16 expression from the parties on how long they think
17 Mr. Stacy is going to take?

18 CHAIRMAN JOHNSON: Just informally, but any
19 indications on the cross of -- well, the direct and the
20 cross of Mr. Stacy? If we could go quickly, how much
21 time you think it will take?

22 MR. ELLENBERG: I think the direct is rather
23 brief. You can give us a better idea of the summary,
24 Lee.

25 MS. WILSON: I have about 15 or 20 minutes.

1 MR. WILLINGHAM: I'll have about 15 or 20
2 minutes.

3 MR. MELSON: I've probably got an hour.

4 MS. RULE: Since I'm downstream of Mr. Melson,
5 I'm hoping to have a half hour. If I were upstream of
6 him it might be an hour and a half. So somewhere in
7 between those two times.

8 MR. SELF: I'm not planning on any at the
9 moment. I would like to stick to that.

10 MS. CANZANO: Perhaps about 20 minutes,
11 depending on the responses.

12 MR. BOYD: Probably none.

13 CHAIRMAN JOHNSON: Staff?

14 MS. BARONE: And we're downhill all the way,
15 so maybe 15 minutes, max.

16 MR. HORTON: Chairman Johnson, I may have ten,
17 15 minutes.

18 CHAIRMAN JOHNSON: Thank you.

19 MR. ELLENBERG: Chairman Johnson, there's an
20 open issue of whether Mr. Scheye is supposed to return
21 tomorrow. I'm not sure if it related to exhibits or to
22 the argument on the dismissal of the SGAT and whether he
23 would have to come back for questions once the motion
24 had been resolved, but it would help us to know soon if
25 Mr. Scheye needs to be here.

1 CHAIRMAN JOHNSON: I believe that Staff needed
2 Mr. Scheye to answer questions on the exhibits?

3 MS. BARONE: And I've got an indication from
4 the parties that they will need to ask questions on the
5 exhibits, and if they ask the questions, then I won't
6 need to, but I know that he will need to come back for
7 the exhibits.

8 CHAIRMAN JOHNSON: There will be a need
9 there. On the SGAT I know Mr. Melson indicated that he
10 wouldn't have any additional questions.

11 Do the parties anticipate any questions of
12 Mr. Scheye on the SGAT? They're nodding that they will
13 not, but we will still need to deal with him on the
14 exhibits. And also we're trying to get the air turned
15 back on. It was inadvertently turned back off and it's
16 80 degrees and climbing. I called them at 75 degrees
17 and it's taken them a while.

18 Are we ready then for Mr. Stacey? Ms. Rule?

19 MS. RULE: Commissioners, while were on the
20 subject of some of the exhibits and preliminary matters,
21 I would like to schedule a time to hear argument on the
22 motion to strike. There is also AT&T's still
23 outstanding motion to compel, and I haven't had the
24 chance to talk to Ms. White today to find out when they
25 anticipate providing the responses they agreed to

1 provide.

2 MS. WHITE: Yes, I was hoping to do it today.
3 Unfortunately, Mr. Stacy thought he was going to be on
4 sooner than he actually was, so he tore himself away
5 from that to come here. So I would hope that by
6 tomorrow. By tomorrow, hopefully as early as possible
7 tomorrow.

8 MS. RULE: I sure hate to do this, but I would
9 like the right to recall him to talk to him about the
10 responses that I will receive tomorrow, if that's
11 necessary.

12 MS. WHITE: Okay. Can I go ask him
13 something?

14 CHAIRMAN JOHNSON: Excuse me?

15 MS. WHITE: I guess I needed to ask my
16 witness, are you available tomorrow, Mr. Stacy?

17 WITNESS STACY: Yes.

18 MS. WHITE: And if he has to be another day,
19 then we will have to talk about that.

20 CHAIRMAN JOHNSON: And Ms. Rule, we do expect
21 to entertain the argument first thing in the morning.
22 However, we won't --

23 MS. RULE: I would sure like to talk about
24 that. I only got a chance to look at it for five
25 minutes or so.

1 CHAIRMAN JOHNSON: You were the one that told
2 me you were going to be ready on Friday. You set
3 yourself up for that one.

4 MS. RULE: Well, so I was wrong. A rare
5 event, but it does happen.

6 No, I can argue it tomorrow. If you want to
7 hear that tomorrow, we'll argue it. If you want to
8 argue it tonight, we can do it right now. On the other
9 hand, it might be briefer were we to do this, perhaps,
10 say Monday morning.

11 CHAIRMAN JOHNSON: We were going to defer
12 ruling until Monday. Why don't we -- Staff?

13 MS. BARONE: Then I would like the opportunity
14 to be able to chew on your arguments and formulate --

15 CHAIRMAN JOHNSON: I know you wanted that
16 time.

17 MS. RULE: At this point everybody's had a
18 chance to cross-examine all the witnesses but one, who
19 is right here and ready. In that it won't determine
20 what witnesses go on, I don't know that we need a ruling
21 bright and early Monday morning. But whatever is your
22 pleasure.

23 CHAIRMAN JOHNSON: We can give you the time
24 that you need to review the pleadings. Monday, we'll
25 deal with the issue Monday morning.

1 MS. RULE: Actually, I was thinking more of a
2 few hours of sleep instead of reviewing the pleadings.

3 CHAIRMAN JOHNSON: We'll entertain the
4 argument on Monday morning and then decide when we'll
5 make an actual ruling on that.

6 MS. RULE: Thank you.

7 (Transcript continues in sequence in
8 Volume 14.)

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