

## 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. )  
 )

SIXTH DAY - AFTERNOON SESSION

VOLUME 27

Pages 2961 through 3086

PROCEEDINGS: HEARING

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

DATE: Wednesday, September 10, 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.)

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**I N D E X****WITNESSES****NAME****PAGE NO.****JAY BRADBURY**Continuing Cross Examination  
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**J. LANS CHASE**Direct Examination by Mr. Wiggins  
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## P R O C E E D I N G S

(Transcript continues in sequence from Volume 26.)

JAY BRADBURY

continues his testimony under oath from Volume 26.)

CONTINUED CROSS

BY MR. ELLENBERG:

Q Mr. Bradbury, while you're writing, could I ask a question? Isn't it correct that the issue between AT&T and BellSouth that's represented in the sentence that I've asked you to focus on is simply a question of who's going to have to spend money?

A No, sir, and I think if you'll let me finish this, I can demonstrate that.

This is a common gateway interface. We can shorthand it and call it CGI. What does it do? It does two things. It talks to the Legacy Systems in BellSouth that we need for preordering. Those are ATLAS, which is used for address validation, P/SIMS, which is where all the features and services reside. I made a mistake, ATLAS is telephone numbers, P/SIMS is features and services. DSAP is where the information on scheduling of due date resides. RSAG is where the address validation information resides. And CRIS is where the customer record information resides.

So the LENS common gateway interface software

1 talks to ATLAS, P/SIMS, DSAP, RSAG and CRIS. It then  
2 sends a message to the web page generator. The web page  
3 generator is what sends the message to the users of  
4 LENS. The pictures you saw, the pages you saw, with the  
5 logo BellSouth, the little petrochemical plant logo and  
6 all that, all of that is generated by the web page  
7 generator using CGIs that come from the CGI interface.  
8 But what it sends to a new entrant is called hyper text  
9 markup language, HTML.

10           Okay, HTML draws pictures for people to use,  
11 for people to see. So here is the customer service  
12 representative. He's looking -- he or she is seeking  
13 pictures of HTML.

14           Q     Mr. Bradbury, when you get to the part that's  
15 answering my question, would you let me know?

16           A     Yeah, I'm getting there. The CGI  
17 specification would have allowed a computer to talk to  
18 LENS, CGI-to-CGI. At the new entrant's end would be  
19 another common gateway interface that would talk to the  
20 new entrant's operation support systems and draw the  
21 pictures that are needed by the new entrant's  
22 representative.

23                     What's the difference? This is a  
24 computer-to-computer interface. Both parties would have  
25 development to do, would get all this information

1 untouched by human hands except here. Here, this is  
2 only pictures. It has embedded in it a lot of  
3 information that you can scrape off, if you will, and  
4 make into something else behind the scenes. Here you're  
5 doing it in process.

6           The specification that was produced on 3-20  
7 and withdrawn on 4-8 was to do this, a joint development  
8 effort that would have allowed computer-to-computer  
9 interfaces. The specifications that exist after that  
10 simply say, this is what my web page looks like. You go  
11 reverse engineer whatever you'd like to put -- you know,  
12 to scrape it off on the back side, not use it on the  
13 front side.

14           So all work for less output was shifted to the  
15 new entrant when you simply describe the pictures. Here  
16 both parties do development and wind up with an  
17 interface that is machine-to-machine and real-time.

18           Q     Does that conclude your answer?

19           A     Yes, sir.

20           Q     I think when you were were wrapping that up  
21 you said the way you had drawn the chart that both  
22 parties would do development work; is that right?

23           A     For CGI interface, both parties would have  
24 proportional shares of the development work.

25           Q     And does development work not involve spending

1 money?

2 A Yes.

3 Q So didn't the issue in this letter come down  
4 to who was going to have to spend the money?

5 A No. Quite frankly, for BellSouth to have  
6 continued with the CGI development was minimal cost on  
7 their behalf. Those same CGIs are what are going from  
8 the CGI interface to the web page generator. You simply  
9 have to point them in a different direction.

10 Q But as we look at this letter that's Item 34  
11 in your late-filed deposition exhibit, there's nothing  
12 here about technically -- about it being technically  
13 infeasible for AT&T to continue with this project, is  
14 there?

15 As I look at the next paragraph, Mr. Bradbury,  
16 let me ask the question a different way. Doesn't it say  
17 that AT&T is simply making a decision to go on with  
18 development of the EC-LITE interface?

19 A Again, I think it's important to have timing  
20 and other things in context here. This is April the 8th  
21 when this opportunity vanishes. The long term  
22 preordering interface is supposed to be available by the  
23 end of the year. To have continued this, at this point  
24 we were -- Had the CGI interface specifications been  
25 forthcoming, we were expecting it would be mid July,

1 first of August that we would be up on that.

2           So to do that development for use from August  
3 to December when I'm already doing the other development  
4 that will be available December, starting from HTML  
5 wouldn't have been of any value because starting from  
6 HTML, we would have had a longer development time. We  
7 could have done this CGI in the July or August time  
8 frame. Starting from HTML would have put us in the  
9 September or October time frame.

10           Q     I was trying to move things along,  
11 Mr. Bradbury, but I think I'm going to have to ask the  
12 question now, or let you answer my earlier question.  
13 There is nothing that succeeds what we've talked about  
14 in this letter which says it's now technically  
15 infeasible for AT&T to pursue the capability we've been  
16 talking about, is there?

17           A     It's not technically infeasible, but it's not  
18 a wise business decision given the absence of  
19 specifications that describe how to use this as a  
20 machine-to-machine interface. It would not have been  
21 the same interface.

22           Q     And based on this letter because of the shift  
23 in the design work, AT&T made a business decision to  
24 move on with the development of EC-LITE in lieu of this  
25 proposal; isn't that correct?



1           A     Because of the lack of a CGI specification.

2           Q     Could I get a yes or no to my question and  
3 then your explanation, please, sir?

4           A     The answer to your question is yes, because of  
5 the lack of CGI specification AT&T could not proceed  
6 with integrating LENS into its operations.

7           Q     Now, while we're on the subject of your  
8 late-filed deposition exhibit, I do have a few questions  
9 about that. Was this exhibit prepared by you?

10          A     Yes, it was.

11          Q     Is this a part or all of a file that you  
12 routinely maintain?

13          A     Certainly not all. I've got about 112 shelf  
14 feet of documentation that goes back two years.

15          Q     I think we're all thankful you didn't put all  
16 that in. But as I look at the index to Exhibit 1, to  
17 your Late-filed Exhibit 1 -- let me try to get this one  
18 more time. Late-filed Exhibit 1 to your deposition, it  
19 is 91 individual items that I think begin on April 29,  
20 1996 and conclude on August the 8th, 1997.

21          A     Yes, that's correct.

22          Q     Now, I understand that you didn't give us all  
23 the materials for all times, but did you provide all the  
24 materials in your file for the time period April 29, '96  
25 through August the 8th, 1997?

1           A     Are you asking me did I give you every piece  
2 of paper that exists between April 29th and --

3           Q     Well, maybe I misunderstood your earlier  
4 answer. You said, I didn't give you all my file, it was  
5 many shelves. But I took that to mean you gave me a  
6 part of your file; is that not correct?

7           A     Correct, that which I felt was responsive to  
8 the Staff's request.

9           COMMISSIONER CLARK: You asked, "is that not  
10 correct," and he said yes. And I'm confused as to what  
11 he said yes to.

12           MR. ELLENBERG: I was too. That's why I was  
13 going to try to ask it a different way.

14           Q     (By Mr. Ellenberg) So you did cull documents  
15 out of this file that would have fallen into the time  
16 period covered by your late-filed deposition exhibit; is  
17 that correct?

18           A     If it was a document that I didn't think  
19 responded to the Staff's request of me.

20           COMMISSIONER CLARK: So the answer is yes, if  
21 it was a document --

22           WITNESS BRADBURY: Yes, ma'am. If it was what  
23 I didn't think the Staff asked me to provide them, I  
24 didn't put it in here.

25           Q     (By Mr. Ellenberg) To make sure we're all

1 talking from the same page, let's establish what Staff  
2 did ask you for. If you would look at your deposition.  
3 Do you have that available to you?

4 A I think Staff has put it on the table here,  
5 yes.

6 Q Page 9. I think Staff and counsel agreed to a  
7 short title that was Available Documentation Regarding  
8 Discriminatory Interfaces. Do you see that on Lines 1  
9 and 2?

10 A Yes.

11 Q And so I take it what you intended to submit,  
12 and is also the title on your index page, was Available  
13 Documentation Regarding Discriminatory Interfaces; is  
14 that correct?

15 A Yes, and what I would like to do is back up to  
16 Page 8, the question that begins at Line 10, which is  
17 the Staff's question. "I guess what Staff is looking  
18 for in this question is basically any type of  
19 documentation or proof you would have to support your  
20 claim that BellSouth -- that this interface is  
21 discriminatory." That's how this thing kind of grew.

22 Q The general subject matter of the request was  
23 the interfaces being provided by BellSouth; isn't that  
24 correct?

25 A Correct.

1 Q Maybe we can do this just looking at the  
2 index, but if you would look at Page -- Page 2 of the  
3 index to this exhibit. Do you have that?

4 A Yes.

5 Q Do you see Item 43? According to the index,  
6 this is a Coe to Carroll, I assume letter, in response  
7 to May 6th, 1997 letter regarding branding issues, leave  
8 behinds, operator services and features; isn't that  
9 correct?

10 A That's the title that I've put here.

11 Q If you need to look, look, but I couldn't find  
12 that that had anything to do with operational support  
13 systems or interfaces at all. Would you agree with  
14 that?

15 A Not until I go read the letter itself.

16 Q While you're there, Mr. Bradbury, if you would  
17 look at No. 44, which says letter regarding routing of  
18 directory assistance calls.

19 I apologize for taking the Commission's time  
20 to look through this exhibit in this detail. I hope I'm  
21 building a record for an appropriate objection when  
22 Staff moves this exhibit in. I'll try to move it on as  
23 quickly as I can.

24 A As regards to 43, the inclusion here, my  
25 aspect is operation support systems interfaces fall

1 behind ordering all of the things we get from BellSouth  
2 to meet the 14-point checklist items. So in ordering,  
3 the need to order operator services, with and without  
4 branding, selected call routing, all of those use  
5 operation support systems interfaces or manual processes  
6 in lieu of those.

7 Q But the issues in these particular letters  
8 don't relate to the ordering of these items; do they?

9 A I saw that we're talking about ordering  
10 selective routing in the second page of the paragraph.

11 Q Turn with me to Page 3 of the index, then, if  
12 you would. Do you see Items 50 and 53, Letter Carroll  
13 to Coe Regarding Branding Obligations, I believe is the  
14 title of both of those documents? And again, I couldn't  
15 find that those had any specific relationship to the  
16 interfaces being provided. Would you take a look at  
17 those?

18 A That's 50 and 52? (Pause) It talks about  
19 establishing a meeting to work out the details of  
20 implementing BellSouth's branding obligations. Again,  
21 for BellSouth to implement branding in some of these  
22 areas requires selective class of call routing.

23 Q That has to do with leave behind cards that a  
24 BellSouth representative who had a contact with an ALEC  
25 customer might provide to that customer; isn't that

1 right?

2           A     We're also talking about here operator  
3 services, directory assistance and repair calls, which  
4 to get operator services and directory assistance,  
5 either branded for AT&T, or unbranded, requires an  
6 ordering capability.

7           Q     But this particular letter does not address  
8 the ordering capability; isn't that correct?

9           A     It addresses establishing a meeting to work  
10 out the details to implement branding, which would  
11 require ordering.

12          Q     Would you agree with me generally that in this  
13 exhibit there are obviously letters from BellSouth to  
14 AT&T and vice versa? There are transcripts of voice  
15 mails that you received, there are internal memoranda  
16 from AT&T, that there are e-mails from you to other  
17 individuals in AT&T? You would agree with that  
18 generally, wouldn't you?

19          A     All of those types of information are here,  
20 and they -- to my knowledge, as I was putting them  
21 together, they all relate to the interfaces,  
22 implementing the interfaces, or using the interfaces.

23          Q     Now, you testified several weeks ago in a  
24 proceeding much like this one in the state of Georgia;  
25 didn't you?

1 A Yes, I did.

2 Q And I, during the course of that proceeding,  
3 asked you about an e-mail that you wrote dated May 27 to  
4 your superiors that described the disjointed nature of  
5 AT&T's development efforts for interfaces, and  
6 specifically said that hardware, software, personnel  
7 seemed to be in short supply. There just didn't seem to  
8 be a concerted effort in support from above for AT&T's  
9 efforts within AT&T; isn't that correct?

10 A Would you like to cite that properly? You  
11 said May 27th? What year, sir?

12 Q 1996. Did I say '97?

13 A You didn't say a year, but I wanted to be  
14 certain that it was May of 1996.

15 Q Did you write it?

16 A I remember writing an e-mail of that nature.  
17 Do you happen to have it?

18 Q I sure do. You would agree with me, just  
19 looking at the index of Exhibit 1 to your deposition,  
20 that you didn't include that memo or e-mail in this  
21 voluminous document; did you?

22 A No, I didn't. That was an e-mail from me to  
23 my senior management and my executive team talking about  
24 AT&T's internal problems that I saw that were going,  
25 possibly, to stand in our way over a year ago. It got

1 the attention within the company that it needed. Those  
2 resource problems with AT&T were resolved, as is  
3 demonstrated by the fact that on July 24th of last year  
4 we began successful syntax testing of the EDI interface  
5 between the two companies. The issues raised in that  
6 letter were resolved as a result of it.

7 Q But I can't tell from looking at your index of  
8 this exhibit what other e-mail like the one that I have  
9 in my hand that I've asked you about, you've agreed you  
10 wrote, you've left out of this document, can I?

11 A No, you can't.

12 Q Now, I have a few questions about AT&T's  
13 intended use of interfaces, those currently available,  
14 if I can simply lay my hands on those questions.

15 I believe previously --

16 COMMISSIONER KIESLING: I'm sorry, I couldn't  
17 hear what you said.

18 MR. ELLENBERG: AT&T's intended use of  
19 interfaces.

20 COMMISSIONER KIESLING: Right, and then you  
21 said something else.

22 MR. ELLENBERG: I said I have some questions  
23 if I could just find them. I was muttering to myself as  
24 much as anything. And I apologize.

25 COMMISSIONER KIESLING: Sure. I just couldn't



1 hear you. I didn't know if that was part of the  
2 question.

3 COMMISSIONER CLARK: You just need to more  
4 clearly identify when he's muttering.

5 MR. ELLENBERG: I'll make a note of that.  
6 I'll either mutter more softly or more loudly, so it's  
7 clear which I'm doing.

8 Q (By Mr. Ellenberg) I believe you have  
9 testified earlier that of the interfaces currently being  
10 offered through BellSouth's statement, the only ones  
11 that AT&T intends to use on a long term basis are the  
12 direct usage file, CABS billing interface and EDI  
13 interface for ordering; is that correct?

14 A That is correct. And if I could talk about  
15 that just a little bit.

16 Q Is it necessary to explain your answer?

17 A I think it may help with questions I think you  
18 may be going to.

19 Q Well, why don't I ask my questions and maybe  
20 in answering my questions --

21 A There are specific reasons why I mentioned  
22 those three, and only those three.

23 Q Now, specifically, AT&T has determined not to  
24 use the TAFI interface at all; isn't that correct?

25 A That is correct. There's a decision that we

1 made after having received TAFI training, we used it,  
2 analyzed it within our centers for its fit with our  
3 operations, and in light of the fact that the long term  
4 electronic bonded interface, or EBI interface, for the  
5 same functionality will be available before the end of  
6 the year.

7 Q I believe you told Staff in your deposition  
8 that the decision was based on two factors: One, that  
9 TAFI was not a machine-to-machine interface; and two, as  
10 you're suggesting here today, the long term solution  
11 will be available in the near term; is that correct?

12 A Those were two factors included in that  
13 decision, yes.

14 Q Now as I understand as well, AT&T plans to use  
15 LENS for preordering only on an interim basis; is that  
16 correct?

17 A We plan to use LENS from the present until  
18 such time as the long term preordering interface that we  
19 referred to earlier as EC-LITE becomes operational.

20 Q And if everything goes as planned, that would  
21 be in December of this year?

22 A It should be, yes, sir.

23 Q So that would be on an interim basis between  
24 now and December; is that correct?

25 A That's correct. Now we had hoped to use LENS

1 in this integrated fashion that I talked about because  
2 we would have had the specifications and could have  
3 built to it and been in service integrated. We're using  
4 it in a manual mode.

5 COMMISSIONER KIESLING: Mr. Bradbury?

6 WITNESS BRADBURY: Yes, ma'am.

7 COMMISSIONER KIESLING: I've listened to these  
8 explanations, but that was a simple yes or no question  
9 about whether or not it was anticipated it would be  
10 available in December. And the rest of it was just a  
11 repeat of what you've been answering to every other  
12 question.

13 Would you please listen to the question,  
14 answer the question, and if you have to explain your  
15 answer, then explain it, but there's no need to continue  
16 to repeat the same thing over and over.

17 WITNESS BRADBURY: Yes, ma'am.

18 Q (By Mr. Ellenberg) And I also understand,  
19 Mr. Bradbury, that even for that interim period of time,  
20 AT&T does not intend to use all of the functions  
21 available through LENS for preordering; is that correct?

22 A Don't know that we've made that firm  
23 decision. We clearly are going to use the address  
24 validation, the telephone number assignment, the  
25 customer service record. Because of the nature of how

1 due dates are only available for estimation, it may not  
2 represent an improvement over looking at the piece of  
3 paper we've got for due dates. And I missed one. All  
4 of those capabilities will be available to us, all of  
5 our people will be trained on all of them. Whether the  
6 methods and procedures that are ultimately adopted use  
7 them all, at this point it's too early to tell.

8 Q Do you know Cindy Clark?

9 A I do, yes, sir.

10 Q Who is Cindy Clark?

11 A Cindy Clark is our subject matter expert on  
12 preordering interfaces.

13 Q Isn't it true that she wrote a letter dated  
14 August 28th of this year to Marsha Moss of the BellSouth  
15 AT&T account team that said, AT&T will not use the LENS  
16 inquiry function to view features and services. AT&T  
17 users will continue to access AT&T's own database for  
18 this function?

19 A I haven't seen the letter, but it wouldn't  
20 surprise me. We do have, as part of the interim  
21 interfaces that we have today, access to P/SIMS and  
22 another method.

23 Q But it wouldn't surprise you if she'd done  
24 that?

25 A It wouldn't surprise me. She's more connected

1 last week to this process than I am.

2 MR. ELLENBERG: Chairman Johnson, I'm going to  
3 hand the witness a document now that I would like marked  
4 with the next exhibit number, please, for purposes of  
5 identification.

6 CHAIRMAN JOHNSON: Exhibit 103. Is this a  
7 convenient time for us to break?

8 MR. ELLENBERG: It's as good as any.

9 CHAIRMAN JOHNSON: We'll break for lunch.  
10 We'll take 30 minutes.

11 (Recess at 12:30 p.m. until 1:10 p.m.)

12 CHAIRMAN JOHNSON: We're going to go back on  
13 the record.

14 BellSouth, did you want this marked?

15 MR. ELLENBERG: Yes, Chairman Johnson, I do.

16 CHAIRMAN JOHNSON: We'll mark it as Exhibit  
17 103.

18 (Exhibit No. 103 marked for identification.)

19 Q (By Mr. Ellenberg) Mr. Bradbury, do you have  
20 a copy of Exhibit 103 in front of you?

21 A Yes, sir, I do.

22 Q Would you turn to Page 2, please?

23 A Yes, sir.

24 Q About the middle of the page, do you see the  
25 caption Features and Services?

1           A     I do.

2           Q     Just glance through that next paragraph and  
3 see if you'll agree that's the portion I read just  
4 before lunch.  If we need to read it again, we can do  
5 that.

6           A     No, sir.

7           Q     All right, to tie up this line then, and get  
8 us back on track from the lunch break, you have agreed  
9 with me that AT&T does not plan to use the TAFI  
10 interface at all, correct?

11          A     That's correct.

12          Q     And intends to use only some of the functions  
13 offered through the LENS interface between now and  
14 December of this year, correct?

15          A     It intends to use all of the preordering  
16 functions of the LENS interface, with the exception of  
17 features and services function.

18          Q     For the interim period between now and  
19 December, correct?

20          A     Assuming that the long term preordering  
21 interface becomes functional in December.

22          Q     Again, if you would start your answers with a  
23 yes --

24                   COMMISSIONER KIESLING:  The answer was yes?

25                   WITNESS BRADBURY:  Yes.

1                   COMMISSIONER KIESLING: Between now and  
2 December 6th?

3                   WITNESS BRADBURY: Yes, ma'am.

4           Q        (By Mr. Ellenberg) Now would you accept,  
5 subject to check, that over a third of your testimony is  
6 spent evaluating and critiquing LENS and TAFI?

7           A        Sounds about right.

8           Q        May I take that as a yes?

9           A        Yes.

10          Q        So to put that in context, over a third of  
11 your prefiled testimony is spent critiquing interfaces  
12 that AT&T intends either not to use at all or only use  
13 for a limited period of time; isn't that correct?

14          A        That is correct. However, I don't believe  
15 that precludes me from talking about them. They are  
16 interfaces that are included in BellSouth's SGAT for use  
17 by all players.

18          Q        Now that raises the next question. AT&T does  
19 not intend to use interfaces out of the SGAT, does it,  
20 on a long term basis?

21          A        On a long term basis, as I said earlier, there  
22 are three that are described in the SGAT that match  
23 what's in our long term. There are things about the  
24 rest of the SGATs that don't match what's in the  
25 interconnection agreement.

1 Q Perhaps I asked the question the wrong way.  
2 AT&T intends to purchase or use interfaces out of its  
3 interconnection agreement on a long term basis; isn't  
4 that correct?

5 A That is correct.

6 Q Now I believe you have agreed with me in  
7 earlier proceedings that in the context of development  
8 and use of interfaces, all companies should incur costs  
9 efficiently; isn't that correct?

10 A That would be the objective that a company  
11 doing an interface development would want, to be as  
12 cost-efficient as they can.

13 Q To put that in the context of the discussion  
14 we had this morning, since the situation with unnumbered  
15 street addresses occurs infrequently, don't you agree it  
16 would be an inefficient -- BellSouth would incur costs  
17 inefficiently to automate that process or make that  
18 information available through interfaces to ALECs?

19 A I think you would have to look at how much it  
20 would have really cost. That's a very incremental  
21 change over the -- the rest of the information that's  
22 already there.

23 Q But it would be a factor you would to take  
24 into consideration?

25 A It would be a factor, yes, sir.



1 Q Let's talk about complex orders. You were  
2 here when Ms. Calhoun testified; weren't you?

3 A Yes, sir, I was.

4 Q Ms. Calhoun testified that BellSouth processes  
5 orders for complex -- customers' complex services  
6 manually; isn't that correct?

7 A Yes, she did.

8 Q And Ms. Calhoun, as I recall, testified that  
9 the reason that was true was that complex orders are  
10 custom, they're not repetitious, and the volume is  
11 relatively low compared to the other retail services;  
12 isn't that correct?

13 A That's what she said, yes, sir.

14 Q So you would agree that since BellSouth  
15 processes those orders manually, that they are custom,  
16 that the volume is relatively low, it might not make  
17 sense from an efficient cost point of view to automate  
18 that process; wouldn't you?

19 A No, sir, I would not.

20 Q But that would be a factor you would want to  
21 take into consideration?

22 A It would be a factor. However, just because  
23 BellSouth has made that decision for its own business  
24 doesn't mean it's the right decision to make when  
25 BellSouth is obligated to provide non-discriminatory

1 access and an opportunity to compete to new entrants.  
2 That same manual process that BellSouth uses  
3 discriminates against you in entrants.

4 Q I'm really confused now. If BellSouth does  
5 something manually and makes it possible for the ALEC to  
6 also do that same thing manually, how can that possibly  
7 be non-discriminatory -- or be discriminatory? Pardon  
8 me. My co-counsel corrected me quickly.

9 A There are several reasons it can be  
10 discriminatory. Again, BellSouth has made that decision  
11 for its own business reasons. Those may not in fact be  
12 cost-effective business reasons when you look external  
13 to BellSouth. Those processes -- and really, we need to  
14 be clear here. The manual portion --

15 COMMISSIONER GARCIA: Let me make sure I  
16 understand, because you went back and forth there for a  
17 second.

18 WITNESS BRADBURY: Okay.

19 COMMISSIONER GARCIA: You're saying that the  
20 process that BellSouth uses is discriminatory even  
21 though it's the same process that they're going to do?  
22 That manual part is discriminatory to you?

23 WITNESS BRADBURY: Yes, sir. An example might  
24 be the process that BellSouth uses -- again, it's for  
25 collecting information. Ultimately when they place the

1 order, it's placed electronically. If you listen to the  
2 last phrase of Ms. Calhoun's testimony, or Mr. Scheye or  
3 anybody else who talked about it, "and then the service  
4 order typist enters the order." It goes into  
5 BellSouth's operation support system electronically and  
6 flows through the rest of the area.

7           Now, if a new entrant could do that same  
8 information gathering process in three weeks, and  
9 BellSouth is taking four, the new entrant is being  
10 denied the opportunity to improve the process and  
11 therefore an opportunity to compete effectively. You're  
12 being locked into BellSouth's process.

13           Q     (By Mr. Ellenberg) You would agree with me  
14 that the difference is a business decision that the ALEC  
15 might want to make for itself versus what BellSouth's  
16 obligations may be to provide non-discriminatory access;  
17 isn't that correct?

18           A     I'm not sure I fully understood the question.

19           Q     Well, an ALEC --

20           COMMISSIONER KIESLING: Let me try to help you  
21 here. When you start a question with "you would agree  
22 with me" and then make a statement, and then say, "would  
23 you not agree," or "is that not correct," it's very to  
24 difficult to understand what it is that he's answering.

25           MR. ELLENBERG: All right. And I'll re-ask

1 the question.

2 Q (By Mr. Ellenberg) An ALEC's decision to  
3 improve a process is the ALEC's business decision; isn't  
4 that correct?

5 A It is. However, if BellSouth does not provide  
6 the information that allows a new entrant to make that  
7 business decision, it's BellSouth controlling and  
8 denying the opportunity.

9 Q And the ALEC can make a business decision that  
10 would be independent from BellSouth's obligations to  
11 provide non-discriminatory access under the Act; isn't  
12 that correct?

13 A Only if BellSouth is providing  
14 non-discriminatory access.

15 Q Apparently I did it again. I apologize.

16 COMMISSIONER KIESLING: Yes, you did.

17 Q (By Mr. Ellenberg) Mr. Bradbury, did you  
18 understand my question?

19 A I answered what I understood to be your  
20 question.

21 Q An ALEC can make a business decision, and  
22 that's independent from BellSouth's obligations to  
23 provide non-discriminatory access; isn't that correct?

24 A Yes.

25 Q That's it. We'll move on.

1           Now Mr. Bradbury, the first item on your  
2 chart -- excuse me, the chart to your far right -- is a  
3 listing of the characteristics you think a  
4 non-discriminatory interface must exhibit?

5           A     It's a list of characteristics that the FCC  
6 has recently reaffirmed in its decision. I also think  
7 they are what's required.

8           Q     So the answer was yes?

9           A     Yes.

10          Q     Now, the last item on that chart refers to  
11 standards; is that correct?

12          A     Yes, it does.

13          Q     And there you were referring to the need for  
14 the interface to either adhere to or be able to migrate  
15 to national standards; is that correct?

16          A     Correct.

17          Q     We talked earlier about the interface,  
18 EC-LITE, that BellSouth and AT&T are jointly  
19 developing. Do you recall that conversation?

20          A     Yes.

21          Q     You would agree with me that as -- if the  
22 development process continues on its present course and  
23 the industry standards bodies continue on their present  
24 course, that interface will not be a national standard  
25 interface?

1 A No, I would not.

2 Q I'm sorry, did you say no, it would not?

3 A No, I would not agree with you, sir.

4 Q Is it your testimony then that EC-LITE is a  
5 national standard?

6 A No. It's my testimony that one of the three  
7 components that make up that interface, the use of EDI  
8 data elements has already been selected by an industry  
9 standard body as the appropriate data element for  
10 preordering interfaces. So the EC-LITE, if it  
11 continues, could well turn out to be the industry  
12 standard.

13 Q That's not the direction that the industry is  
14 moving at this point; isn't that correct?

15 A It's unclear, sir. They have endorsed EDI  
16 data elements for preordering. The long term EC-LITE  
17 interface is based on EDI elements for preordering.

18 Q For the specific layer represented by EC-LITE,  
19 the industry has gone a different direction, correct?

20 A The ECIC committee, that's E-C-I-C --

21 Q If you can start with a yes or no, I think it  
22 will help us understand where you're going.

23 A There is a task force recommendation that  
24 indicates a different direction. There has not been a  
25 consensus vote by the committee of the whole to select

1 that or any other direction.

2 Q Now, you testified in a proceeding much like  
3 this in Alabama several weeks ago; isn't that correct?

4 A Yes.

5 Q Do you recall me asking you the question: "I  
6 premise the question on the committee continuing with  
7 the same direction as the vote in March, and AT&T and  
8 BellSouth continuing with the development effort in the  
9 same direction. If both those things occur, the  
10 functionality that's deployed in December will not be a  
11 national standard; isn't that correct?"

12 Do you recall your answer to that question  
13 being, "That is correct"?

14 A This was in the Alabama proceeding?

15 Q Yes, sir.

16 A I probably would have answered that as correct  
17 at that point in time. There have been changes in the  
18 committee's stances.

19 Q That committee is chaired by an AT&T employee;  
20 is that correct?

21 A It is, yes, sir. It's attended by BellSouth  
22 representatives.

23 Q I have a few questions that are based on your  
24 summary. As I recall, one of the criticisms that you  
25 levied at the LENS interface in your summary, it was

1 that there were gaps in design in the LENS interface?

2 A Yes, sir.

3 Q And I believe that one of those gaps in design  
4 that you've talked about in your testimony is that ALECs  
5 cannot tab from field to field on a given screen in LENS  
6 but have to actually move the cursor and click; is that  
7 correct?

8 A That was one of them, yes, sir.

9 Q And during the demonstration last week -- I'm  
10 not sure if it occurred during the demonstration. Let  
11 me ask it another way. If an ALEC attempts to validate  
12 an address and some part of the information is  
13 incorrect, LENS will suggest a number of alternative  
14 addresses to the ALEC rep in many cases; isn't that  
15 correct?

16 A That is correct.

17 Q And again, one of your gaps in design is that  
18 when an ALEC rep identifies the correct address from  
19 that list, the rep must type it into the field -- fields  
20 on the LENS screen as opposed to pointing, clicking and  
21 having it automatically populate those fields; is that  
22 correct?

23 A Typing is one method. They could copy and  
24 paste.

25 Q But those are the kinds of design deficiencies



1 that you're testifying make LENS not useful for a  
2 meaningful opportunity to compete; is that correct?

3 A Those are only some of them. Those are kind  
4 of the nit end of the scale. The fact information  
5 that's available to BellSouth isn't available on the  
6 larger end of the scale.

7 Q That's the kind of thing we talked about this  
8 morning with driving instructions?

9 A The list of NNXs available for a central  
10 office would be a larger example.

11 Q You also talked about inefficiencies, and one  
12 of those was the need to validate an address up to three  
13 times when using LENS for preordering functionality; is  
14 that correct?

15 A Yes. We saw that demonstration here where you  
16 used LENS to simulate gathering the information for a  
17 new installation.

18 Q And you are aware, are you not, that BellSouth  
19 has already put in process an update to require the  
20 entry of the address and validation of address only one  
21 time?

22 A I'm aware that Ms. Calhoun and Mr. Stacy have  
23 stated that such a development is underway. There's  
24 been no communication, other than in hearings like this,  
25 between BellSouth and the CLECs who might want to say

1 how that should be done. Also Ms. Calhoun said she  
2 didn't know when it would be done. So there's a paper  
3 promise on the table, yes, sir.

4 Q And another inefficiency that you claim exists  
5 is the need to scroll through the list of interexchange  
6 carriers, correct?

7 A Yes, sir. We saw that demonstrated the other  
8 day, and it's not a scroll through. If you'll notice  
9 there were ten there. We had to hit "next" and you got  
10 another ten, hit "next" and get another ten. And like I  
11 said, you had no idea where you were going.

12 Q Finished? Now, between AT&T and MCI and  
13 Sprint, you would agree with me that those three  
14 carriers have basically 80 percent of the interexchange  
15 market?

16 A I don't know that number.

17 Q You won't accept that number?

18 A I'll accept it, but I don't know it.

19 Q So at least 80 percent of the time the ALEC  
20 rep is going to be putting in one of three PIC codes;  
21 isn't that correct?

22 A No, sir. There's no way you can make that  
23 assumption. I can't tell a customer who is coming to me  
24 for local service what carrier he wants his long  
25 distance service to be.

1 Q If history is any teacher, then, 80 percent of  
2 the time one of those three codes will be used, correct?

3 A I really can't say.

4 Q Do you know whether AT&T intends to encourage  
5 its local customers to use AT&T for interexchange  
6 services?

7 A Certainly we won't be encouraging them, but we  
8 cannot deny them the opportunity to select someone else.

9 Q I'm sorry, the first part of your answer --  
10 COMMISSIONER DEASON: Just a second. You said  
11 you will not encourage your local customers to choose  
12 AT&T as their interexchange carrier?

13 WITNESS BRADBURY: I may have heard the  
14 question backward. I thought I heard the question would  
15 I be encouraging them to pick someone else. That's the  
16 question I was answering.

17 COMMISSIONER DEASON: Maybe I heard the  
18 question wrong. You will be encouraging your local  
19 customers to utilize AT&T's services for interexchange  
20 purposes?

21 WITNESS BRADBURY: That would certainly be our  
22 preference, yes.

23 Q (By Mr. Ellenberg) Back the subject of  
24 complex services. In your summary you made reference to  
25 the revenues represented by complex services. Do you

1 recall that?

2 A Yes, sir, I do.

3 Q Do you know the amount of annual revenue for  
4 interLATA traffic in the long distance market in  
5 Florida?

6 A The amount of revenue for interLATA toll in  
7 Florida?

8 Q Yes.

9 A I don't know that I have that information, but  
10 let me look. (Pause)

11 Since the only information I have is  
12 BellSouth's ARMIS report, the total market is not there.

13 Q Would you agree that the revenues represented  
14 by the interLATA long distance market in Florida is a  
15 big number?

16 A Yes, sir.

17 Q And you would agree with me that AT&T has a  
18 substantial share of that market?

19 A Yes, sir.

20 Q And you would agree with me that if BellSouth  
21 enters into the market, entry into that market is  
22 delayed, that will serve AT&T's financial interests;  
23 wouldn't you?

24 A I don't know whether it does or not, sir, to  
25 be honest. It's beyond my knowledge.

1 Q Would you agree that to the extent AT&T is in  
2 this proceeding attempting to block BellSouth's entry,  
3 that AT&T is controlling access to a large revenue  
4 stream in this state?

5 A No, sir, and that's not why I'm here. I'm not  
6 here to block BellSouth's entry into the local market.  
7 I'm here to testify as to whether or not BellSouth  
8 operations support systems have met the checklist.

9 Q I believe in your prefiled testimony you make  
10 the statement that the long term interfaces to be  
11 delivered in December of this year will provide  
12 non-discriminatory access; isn't that correct?

13 A That was the design intent of the  
14 specifications jointly agreed to, yes, sir.

15 Q And I believe you have told me in other  
16 proceedings that you're not aware of any interface  
17 currently available offered by any incumbent local  
18 exchange company that provides non-discriminatory  
19 access, correct?

20 A Correct.

21 MR. ELLENBERG: That's all I have. Thank you,  
22 Mr. Bradbury.

23 CHAIRMAN JOHNSON: Staff?

24 CROSS EXAMINATION

25 BY MS. BARONE:

1 Q Good afternoon, Mr. Bradbury.

2 A Good afternoon.

3 Q I would first like to ask you a question about  
4 Exhibit No. 101, which is right behind you, and on  
5 Page 2, specifically with respect to non-discriminatory  
6 interface where you have gateway interface.

7 A Yes, ma'am.

8 Q Between the new entrant and BellSouth. I  
9 would like to know, has the FCC stated whether a gateway  
10 interface is necessary between a new entrant's OSS and  
11 BellSouth's OSS?

12 A They haven't used the term "gateway  
13 interface." They do use the term "electronic interface"  
14 as being characteristic and a standard.

15 Q And where do they state that?

16 A I need to look at my cheat sheet. I believe  
17 it's paragraph 137, but let me look at it here again, of  
18 the Ameritech decision.

19 Q And paragraph 1 -- I'm sorry? Which order are  
20 you referring to?

21 A I'm referring to the Ameritech decision, and  
22 yes, it is paragraph 137 that I would reference.

23 Q And would you read the portion that supports  
24 your position?

25 A I'm in paragraph 137, and I'm starting to read

1 the sentence that says, "For those functions that the  
2 BOC itself accesses electronically, the BOC must provide  
3 equivalent electronic access for competing carriers."

4 Q And how do you interpret that?

5 A I interpret it visually as I've gotten in the  
6 middle line on that chart there.

7 Q And you believe that the common gateway  
8 interface is the equivalent?

9 A The gateway interface that I've described  
10 here, if you had a common gateway interface on a LENS,  
11 that would probably meet it also, yes.

12 Q Sir, in your summary you stated that there is  
13 one functioning mainframe interface at this time. Are  
14 you referring to EDI?

15 A EDI, yes, ma'am.

16 Q You also stated that this requires manual  
17 intervention. Would you explain to me where manual  
18 intervention is required?

19 A There are two major places where it happens  
20 today. Because the EDI interface is not integrated with  
21 the preordering LENS interface on the front end at the  
22 new entrant's side, you have manual intervention to take  
23 information from LENS, put it into the ordering  
24 interface for transmittal back to BellSouth.

25 At the BellSouth end of that same interface,

1 not all of the services that you can put into the  
2 pipeline to order are actually automated at the  
3 BellSouth end of that pipeline. They fall out to a  
4 service representative to be retyped or resubmitted.

5           Likewise, in returning information to AT&T for  
6 provisioning, rejects, notices of jeopardies are  
7 returned outside the system as faxes and telephone  
8 calls.

9           Q     Now which services aren't automatically  
10 entered? You stated on BellSouth's end that some  
11 services aren't automatic and they have to be manually  
12 entered in. Could you tell me which services those are?

13           A     I can name a few of them. This certainly  
14 isn't an all inclusive list. But the PBX trunks that we  
15 talked about earlier, the DID, complex services like the  
16 ISDN basic rate, if you were to send over a UNE order  
17 for a loop, it falls out to a manual process.

18           Q     Would all of those be characterized as complex  
19 services? I know you've mentioned PBX and then you said  
20 complex services such as, but are all of those  
21 considered complex services?

22           A     I think the ones I just mentioned BellSouth  
23 considers complex, yes.

24           Q     So it's your understanding that only complex  
25 services are entered manually; is that correct?



1           A       There are some others that aren't nearly so  
2 complex in my mind. One I can think of would be the --  
3 a service called Prestige Custom Calling. It's a  
4 minature --

5           Q       Why wouldn't that be considered complex in  
6 your mind?

7           A       It's really just simply grouping together  
8 services that exist -- it's all codes. It's simply  
9 USOCs, which is uniform service order code, and feature  
10 identification codes, called FIDs, that are there. It's  
11 just BellSouth doesn't read them on the other end when  
12 you send them across. So it's not really a complex  
13 service by any means. It's a service that you could  
14 order for a small business that might have six to 15  
15 lines. It's all central office work, translations,  
16 things of that nature.

17          Q       So BellSouth wouldn't have to do anything  
18 except enter the information into the system; is that  
19 what you're saying?

20          A       Yes, ma'am.

21          Q       And they don't have to confer with a business  
22 in order to process that service?

23          A       No, they don't.

24          Q       Why not?

25          A       It's just not that complex a service. It's

1 one that a salesperson can sit down with a small  
2 business, adequately describe the whole service and then  
3 get it ordered.

4 Q You haven't -- have you ordered that service  
5 in Georgia or Florida?

6 A No, we haven't.

7 Q Sir, does EDI have the capability to hold  
8 orders?

9 A To hold orders?

10 Q Yes. For example, LENS has the capability of  
11 holding orders for 30 days. Does EDI have that  
12 capability?

13 A I'm not aware that LENS has that capability.

14 Q I'm sorry, RNS. I mean RNS.

15 A RNS has that capability. No, EDI does not  
16 have that capability. Neither EDI nor LENS can you  
17 place an order with BellSouth and put it in a hold  
18 state.

19 Q Have you attempted to do that?

20 A Not attempted to do it, because we've been  
21 told and we know from the coding that it's not  
22 possible.

23 Q And you've stated that LENS doesn't have the  
24 capability of holding orders either?

25 A No, it does not.

1 Q How do you define a pending order?

2 A A pending order is an order that has been  
3 submitted, has a due date, say, maybe five days from  
4 now. In the state between now and when it's installed,  
5 it's pending.

6 Q So where in the ordering process then would  
7 that order become pending?

8 A Once it's accepted by BellSouth service order  
9 control system, or SOCS.

10 Q Can you tell me the purpose or the function of  
11 the LEO database?

12 A As I understand the purpose and the function  
13 of the LEO database, it applies business rules and  
14 formatting rules to a new entrant's EDI or LENS order to  
15 determine if the order can be automated, or if it must  
16 be processed manually.

17 Q What do you mean "business rules"?

18 A Does this service that you're ordering, have  
19 you provided me all of the information about it? Remote  
20 call forwarding, if I've ordered remote call forwarding,  
21 did I also provide you the number that you need to  
22 remote call forward to?

23 One of the things we've recently discovered,  
24 the formatting checks in LEO actually stop the  
25 processing of the order. This is a recent discovery.

1 The whole concept that these interfaces are supposed to  
2 be designed on is that all errors are found and reported  
3 in one step. We've just discovered that LEO, when it  
4 sees a format error, stops and does no further error  
5 checking.

6 Q Is it your understanding that BellSouth uses  
7 the FUEL database for its retail ordering?

8 A Yes, ma'am. The FUEL database -- and that's  
9 another acronym short for FID and USOC, edit library,  
10 actually sits across or runs in parallel with the  
11 regional negotiation system that BellSouth uses to  
12 submit residence orders. So as you are typing an order  
13 in RNS, FUEL is running and looking at your order. If  
14 you make an error that FUEL doesn't like, it tells you  
15 right then and you have to fix it.

16 Now, the analog to FUEL, supposedly, is LEO.  
17 The difference is LEO does not see your order until  
18 after you have finished with it and sent it to  
19 BellSouth. You cannot fix it while you're on line.

20 Q Are there any other differences between LEO  
21 and FUEL?

22 A That's the functional difference I know of. I  
23 don't really know what all of the edits within fuel are  
24 as compared to the edits within LEO.

25 Q Can you tell me the function or purpose of

1 LESOG?

2 A LESOG really is another technical term, a  
3 terminal emulator. LESOG basically takes the output  
4 from LEO and says, okay, I'm going to act like a  
5 BellSouth service representative and put this  
6 information into a format that SOCS can understand. So  
7 LESOG really works like RNS or DOE. The output from it  
8 should look identical when it gets to SOCS.

9 Q Is it your understanding that BellSouth uses  
10 the SOLAR database for its retail service order  
11 generation?

12 A Yes, ma'am.

13 Q How do LESOG and SOLAR differ?

14 A Again they differ primarily in that SOLAR is  
15 on line with the BellSouth service representative when  
16 they're making the order. So if there's an error that  
17 SOLAR finds, it's found while you are on line with your  
18 customer, you can correct it and then send the order  
19 on. LESOG, again, is not on line with you while you're  
20 creating an order. It doesn't come on line until after  
21 the order has been submitted.

22 Q Any other differences?

23 A Not that I'm aware of.

24 Q Are you aware of any other databases that were  
25 created to survey LECs that BellSouth doesn't use

1 itself?

2           A     Not databases, but there are, of course, the  
3 whole host of these navigator contracts, the pieces of  
4 software that talk between LEO and LESOG and the SOCS  
5 system, or RSAG, P/SIMS. Each of those is a different  
6 piece of software than is used by BellSouth.

7           Q     Can you identify those for me?

8           A     I don't know their names, but it would be the  
9 navigator contracts that talk between LENS and RSAG,  
10 between LENS and P/SIM, between LENS and ATLAS, between  
11 LENS and DSAP, between LENS and CRIS and so forth.  
12 There's a navigator contract that describes each one of  
13 those. It's not the same navigator contract that  
14 describes how RNS talks to those same databases.

15          Q     And just since we're on this line, so what is  
16 the contract for RNS communication?

17          A     I really don't know. That is BellSouth's  
18 own. I don't know what it might have in it that's not  
19 in AT -- or the LENS contracts.

20          Q     Is it your understanding that LEO and LESOG  
21 were developed by BellSouth to meet the requests by  
22 ALECs that a single interface be used for both  
23 residential and business ordering?

24          A     I understand that that's what BellSouth has  
25 testified. Interestingly enough, I don't believe that

1 either LEO or LESOG are absolutely required for all  
2 CLECs to be able to get in. They're clearly required, I  
3 think, at the small end for a CLEC who is going to use  
4 LENS or the EDI PC package. But for a new entrant who  
5 might be using mainframe EDI, all of the edits that  
6 occur in LEO and LESOG could and would have better been  
7 built on the new entrant's side so that they could be  
8 run in parallel with the ordering process, which would  
9 then really make it really the same as RNS and DOE.

10 Q Then do you believe it was necessary for  
11 BellSouth to develop LEO and LESOG to support a single  
12 interface that includes residential and business  
13 ordering capability?

14 A It certainly made that easier.

15 Q Do you know whether or not the LEO and LESOG  
16 databases provide you with the same ordering  
17 capabilities that the FUEL and SOLAR databases provide  
18 BellSouth?

19 A No, I have never seen a comparison of the  
20 business rules and edits used in SOLAR or FUEL.

21 Q BellSouth Witness Calhoun stated that the firm  
22 order mode of LENS incorporates the same preordering  
23 functions that are provided in the inquiry mode. Does  
24 the preordering information accessed in the LENS firm  
25 order mode automatically populate the appropriate fields

1 in the firm order mode?

2 A It would populate the fields if you were using  
3 the LENS order. So it populates the LENS preorder order  
4 fields, but it does nothing for the EDI standards.  
5 There's no integration there.

6 Q When ordering through EDI, preordering  
7 information must be accessed through the inquiry mode of  
8 LENS; is that correct?

9 A It could be accessed through the inquiry mode  
10 or the firm order mode. That is a true statement that  
11 BellSouth has made. There are problems in accessing it  
12 in the firm order mode in that you're now driven into a  
13 lock step process, and you must, if you want to use due  
14 date calculations, you've got to actually place a valid  
15 order simply to cancel it.

16 Q When ordering through the firm order mode of  
17 LENS, is it necessary to use the inquiry mode of LENS to  
18 access preordering information, or can all of the  
19 preordering functions be accessed through the firm order  
20 mode?

21 A If you're going to place an order that can be  
22 placed in the LENS firm order mode, all of the  
23 information you need can be obtained while you're still  
24 in that mode. If you're trying to place an order that  
25 can't be placed there, that hasn't been made available



1 through LENS yet, then you'll have to come out, go with  
2 the inquiry mode and transport that to either -- if  
3 you're using EDI to your EDI order, or if you're  
4 faxed-based, send a fax.

5 Q Has it been your experience that the  
6 information available through the preordering functions  
7 of the firm order mode are the same as in the inquiry  
8 mode?

9 A No, they are not the same. There are some  
10 significant differences. Some differences are good,  
11 some differences are bad.

12 One of the nice things about using the  
13 preorder mode is you do only have to do an address  
14 validation one time. To offset that, though, if all you  
15 wanted to look at was features and services, you must  
16 also first assign a telephone number, an additional step  
17 that you wouldn't have to do in the inquiry mode.

18 If you get to the features and services mode  
19 in preorder, the only features and -- pardon me, in firm  
20 order mode -- the only features and services that are  
21 there are those that could be ordered if you're using  
22 the LENS interface, not the whole world that you can  
23 actually order. So it's a very problematical thing.

24 Now we have requested that BellSouth consider  
25 in its redesign that the interface should be designed as

1 a single mode to allow a new entrant to come in, select  
2 which function they want to do, in which order they want  
3 to do it, and have the data from one function to the  
4 other, you know, move forward with it.

5 Q Were you present during Ms. Calhoun's  
6 testimony?

7 A Yes, I was.

8 Q I believe she stated that all of the functions  
9 in the firm order mode were the same as in the inquiry  
10 mode. Do you remember her saying that? And she went  
11 through the list?

12 A I don't remember her saying that, but --

13 Q Well, then perhaps you can tell me what's in  
14 the firm order mode that's not in the inquiry mode, or  
15 vice versa?

16 A One of the things I just mentioned. If I'm in  
17 the firm order mode looking at features and services,  
18 only the features and services that I can actually order  
19 through LENS are available to me there. If I'm in the  
20 inquiry mode looking at features and services, all of  
21 the features and services that I can order using any  
22 vehicle are available to me. So there's one.

23 If I'm in the firm order mode doing telephone  
24 number work, in the firm order mode that's called  
25 selection. In the inquiry mode, that's called

1 reservations.

2           Start with the reservations first. If I'm  
3 using it for reservations, BellSouth says I'm not  
4 placing an order, and so they put restrictions on what  
5 can happen there. They do a count that says you can  
6 only have the smaller of 100 numbers, or 5 percent of  
7 the available numbers in an office reserved in your name  
8 at any one point in time.

9           If I go over to that same central office, I  
10 can always get a number to select. This is a real  
11 problem for us in our market entries in Georgia right  
12 now. You go over to LENS to reserve a number for new  
13 installation in a central office and you can't get one  
14 in the inquiry mode. Yet if you come over to the firm  
15 order mode, you can get one.

16           Q     I believe Ms. Calhoun stated that it wasn't  
17 necessary -- I believe I asked her a question about  
18 what -- when you place information in the inquiry mode,  
19 how you would -- if you could automatically populate the  
20 firm order, and I believe she stated that you didn't  
21 need to because you could go directly to the firm order  
22 mode.

23                   Why is it necessary -- I think you're telling  
24 me that there's a difference between the inquiry mode,  
25 what you can get out of the inquiry mode versus what you

1 can get out of the firm order mode. If you're not going  
2 to be ordering out of the inquiry mode, why is that --  
3 why is that a problem?

4 A Okay, again, AT&T's use of LENS is for  
5 gathering preordering information to put in our orders  
6 which will be submitted over the EDI standard  
7 interface. So what I am doing in LENS is preordering.

8 Again, so I am not using the ordering end of  
9 it, which is what the firm order process was really  
10 designed to support. It's a -- not an -- abuse is not  
11 the right word, but it's not the design intent to use  
12 firm order for inquiry work. It really doesn't flow  
13 well for that. You can do it. You can get preorder  
14 information out of the firm order side, but you still --  
15 it doesn't help. You still have to transfer it manually  
16 to your EDI order.

17 Q Does LENS or EDI have an order summary screen  
18 which shows that the customer -- what the customer has  
19 ordered so the ALEC service representative can confirm  
20 the entire order while on line with a customer?

21 A LENS does not have such a screen. The AT&T  
22 ordering vehicle that uses EDI has such a screen. It  
23 does not, however -- since BellSouth does not return to  
24 us what are called detailed firm order confirmations, or  
25 detailed completion notices, I don't really have a

1 screen available to my service representative when you  
2 call me back the next day to say what was actually  
3 ordered. I have a screen that says what I sent, but I  
4 don't have a screen that says what actually got into  
5 BellSouth's system. BellSouth has that screen, what's  
6 actually in their system.

7 Q You said AT&T is interfacing with EDI. Are  
8 you talking about EC-LITE? What interface are you  
9 talking?

10 A EDI for ordering. EC-LITE is used for a  
11 preordering long term interface.

12 Q I think you just stated that BellSouth hasn't  
13 been providing you with the FOCs. How does AT&T confirm  
14 the order with the customer?

15 A Let me make sure. We get a firm order  
16 confirmation from BellSouth. However, it is a simple  
17 firm order confirmation. It says, "I got your order.  
18 It's been accepted." It doesn't tell me what was  
19 actually input. It's not a mirror image of the order as  
20 it resides in BellSouth's systems. It just says, "I got  
21 yours. It's there."

22 Q When do you receive that again, and how?

23 A BellSouth is supposed to return those to us  
24 within 24 hours. They come to us over the EDI  
25 interface. Their performance at this point in time is

1 about 38 percent of the time they don't make the 24  
2 hours.

3 Q When an AT&T service representative has a  
4 customer on line, and after they've taken that order,  
5 how do they confirm that order with the customer?

6 A As the final step in our process, we read from  
7 our summary screen, you know, the summary of the order  
8 that we have prepared and are ready to submit to  
9 BellSouth.

10 Q And where does that summary screen appear?

11 A It appears on an AT&T system, okay. It's not  
12 on an EDI screen. It's on an AT&T screen.

13 Q Does the ordering mode of LENS comply with the  
14 national standards for an ordering interface?

15 A No, ma'am, it does not.

16 Q And would you please explain to me why it does  
17 not?

18 A Again, the industry standard for new entrant  
19 ordering for resale services, and what are called  
20 customer-specific unbundled network elements, is the  
21 EDI. For infrastructure network elements it's the EXACT  
22 system. LENS doesn't conform to either of those  
23 standards.

24 Q Do BellSouth's internal ordering interfaces,  
25 RNS and DOE, comply with or meet the national standards

1 set by the OBF?

2 A No, but they're not required to. They're  
3 BellSouth's proprietary systems. They're not used by  
4 anyone other than BellSouth. They talk with BellSouth's  
5 own systems the way BellSouth wants them to.

6 Q Why is AT&T having the EC-LITE system  
7 developed?

8 A To meet what we think are the requirements of  
9 the non-discriminatory interface, give us the  
10 functionality that would come from the  
11 non-discriminatory interface with BellSouth and any  
12 other ILEC who wants to build what we've made a publicly  
13 available specification.

14 Q Could you be more specific for me? I would  
15 like to understand why it is AT&T did not choose LENS.  
16 Can you basically give me the functionalities that  
17 EC-LITE have that LENS doesn't have, or the things that  
18 you were looking for?

19 A The primary underlying functionality is that  
20 the EC-LITE interface is a machine-to-machine,  
21 computer-to-computer interface. LENS is a  
22 human-to-computer interface. Makes all the difference  
23 in the world. Means you can -- means on a new entrant  
24 side, you accomplish what we show in the middle swim  
25 line, the integration of the operation support systems

1 between the two companies at the system level, that  
2 computers talk to each other, not a person talking to  
3 two sets of computers as you see in the bottom line.

4 CHAIRMAN JOHNSON: Let me ask a question. I  
5 thought you said that LENS could be a  
6 computer-to-computer, or are we talking about something  
7 different here?

8 WITNESS BRADBURY: LENS, as it is presently  
9 designed and deployed, is a human-to-machine interface.

10 CHAIRMAN JOHNSON: Because of this HT --

11 WITNESS BRADBURY: Because there are no  
12 specifications available to make it a human-to-machine  
13 interface. Even if it were to become a human-to-machine  
14 interface, since it doesn't use EDI data elements it's  
15 not in the right direction that the industry is going  
16 for preordering, where EDI data elements have already  
17 been established as the standard.

18 CHAIRMAN JOHNSON: So even if -- if I  
19 understood when you did this example, you were  
20 suggesting that there was some breakdown because Bell  
21 only wanted to -- well, I was understanding you to say  
22 Bell offered this HTML kind of technology that did the  
23 web face, but that you were requesting the other  
24 technology, the CGI. But even if you had gotten that,  
25 that wouldn't have been optimal, or you wouldn't have



1 wanted it?

2           WITNESS BRADBURY: We wanted that. It  
3 wouldn't have been optimal, but it would have been a  
4 leap forward from where we are. We could have  
5 integrated that into our system. When we talk about  
6 integrating something into the system, then, the person  
7 using an integrated interface doesn't know they're using  
8 LENS. They don't care. They're typing and creating  
9 their service order in AT&T's system behind the scenes.  
10 This computer-to-computer interface is operating. They  
11 don't know its LENS. With the HTML, they know it's  
12 LENS. They have to click on, "I want to talk to  
13 BellSouth, and I want to do LENS," or they have to click  
14 on, "I want to talk with Southwestern Bell and I want to  
15 do EEAS." That's non-integrated. Integrated, they just  
16 keep working in their own system.

17           Q     (By Ms. Barone) So if BellSouth gave you  
18 specifications so that you could have a  
19 machine-to-machine interface with LENS, it still  
20 wouldn't be what AT&T desires; is that correct?

21           A     Because of the timing today, the nearness of  
22 the EC-LITE interface and the fact that the EC-LITE  
23 interface incorporates the EDI data elements, which are  
24 already selected as being part of the standard, it  
25 wouldn't seem to make good sense to go to a non-standard

1 machine-to-machine, if you can go to a  
2 machine-to-machine that's closer to the standard. Both  
3 of them would be non-standard, but one would be closer.

4 Q So it's basically a timing issue?

5 A Yes, ma'am.

6 Q I just want to clarify something. Will  
7 EC-LITE integrate preordering functionality with the use  
8 of EDI for ordering?

9 A That's its intent, yes, ma'am.

10 Q Will the EC-LITE interface eliminate the need  
11 to manually input data in BellSouth's OSS and then  
12 manually input the data again into the new entrant's  
13 OSS?

14 A That is how we will implement it and integrate  
15 it, yes, ma'am.

16 Q Do you think, or rather do you know whether  
17 the FCC requires an RBOC to offer a common gateway  
18 interface to avoid manual intervention that you've  
19 described?

20 A I don't think the FCC specified any particular  
21 type of interface.

22 Q Okay, or a particular interface. It doesn't  
23 have to be the CGI that we're talking about.

24 A Again in paragraph 137, and in other  
25 paragraphs, they talk about equivalent electronic

1 access.

2 Q And again that's the Ameritech order; is that  
3 correct?

4 A Correct.

5 Q Were you here earlier when Mr. Hamman stated  
6 that AT&T has not ordered number portability in Florida?

7 A Yes, ma'am.

8 Q In your deposition transcript, which has been  
9 marked Exhibit No. 102, on Page 37, at Lines 17 through  
10 25, you state that Phase 1 -- that EDI Phase 1 does not  
11 provide ordering of number portability. You also state  
12 that there is no electronic means to order number  
13 portability, and that the only viable means to order  
14 number portability is to send a fax.

15 Were you also -- I believe you may have been  
16 present at Ms. Calhoun's deposition. She stated during  
17 her deposition on Page 177, at Lines 14 through 16, that  
18 number portability can be ordered using the industry  
19 standard EDI interface. Are you aware of that?

20 A I'm aware of that, yes, ma'am, and I can --

21 Q Do you agree with her?

22 A No, I do not.

23 Q And why not?

24 A Because that interface that she describes is  
25 not in service.

1 Q Excuse me?

2 A Is not in service. There is no one using that  
3 described interface.

4 Q So because it's -- because no one has used it,  
5 it's not in service, or do you have practical experience  
6 knowing that it's not in service?

7 A It's not in service. Again, we talk about  
8 this in my summary. The description of the interface  
9 that she's talking about there is contained in the Local  
10 Exchange Ordering Implementation Guide. Okay?

11 BellSouth has put five of those over the wall  
12 since December of last year, just they suddenly appear,  
13 here's the next description of EDI Phase 2, which  
14 BellSouth has developed by themselves. No one has  
15 tested it with BellSouth. No one has been able to do  
16 coding and mapping with BellSouth on it. It's not in  
17 service.

18 We are attempting to get there right now. In  
19 fact we have meetings with BellSouth to take the  
20 interface that we're on, move it forward, incorporating  
21 some of the things that are described. And interim  
22 number portability is one of the things we want to get  
23 in there, but it's not there today.

24 Q AT&T hasn't attempted to order it through the  
25 EDI interface, has it?

1           A     No. You can't send that order across.  
2 There's no mapping in that interface to allow a number  
3 portability order to flow through.

4           Q     And how do you know there's no mapping?

5           A     We jointly developed the functioning interface  
6 with BellSouth.

7           MS. BARONE: Thank you, Mr. Bradbury. That's  
8 all I have.

9           CHAIRMAN JOHNSON: Commissioners? Ms. Rule?  
10 There probably isn't much redirect, since he's been  
11 conducting his own, but go ahead.

12           MS. RULE: I thought maybe he could ask me a  
13 few questions.

14                               REDIRECT EXAMINATION

15 BY MS. RULE:

16           Q     Mr. Bradbury, Ms. Barone asked you some  
17 questions about the capabilities of EDI. What's it  
18 going to take for AT&T to be able to order those UNEs  
19 over the EDI interface? What more work remains to be  
20 done?

21           A     What more work remains to be done is the work  
22 that's beginning or will begin at our next meeting with  
23 BellSouth on the 15th of this month to sit down. We  
24 have provided BellSouth with our analysis of how the  
25 existing interface is mapped, how BellSouth's Phase 2 is

1 mapped, the changes that would be necessary to both of  
2 those mappings to comply with the existing standard,  
3 which is called Issue 7, and changes which would be  
4 needed to comply with the next version of the standard  
5 called Issue 8. We've provided that information to  
6 BellSouth as a basis of a joint planning meeting to  
7 migrate from where we are, the existing AT&T/BellSouth  
8 developed Phase 1 EDI interface forward, and incorporate  
9 these things. So efforts to do that are underway  
10 finally in a joint environment where we're both sitting  
11 down trying to do the mapping and describe the  
12 interface.

13 Q Why has that not been completed to date?

14 A BellSouth has not brought to the table the  
15 subject matter experts necessary to do that. It  
16 takes -- on the BellSouth side it takes two different  
17 groups. There's a group called EDI Central, which is  
18 responsible for the operation of the EDI gateway and its  
19 interface to the world, and then there's the BellSouth  
20 Internal Technology Group, which is responsible for  
21 their operations support systems that would be  
22 accessed. They come to the meetings with one group or  
23 the other, never both. And you just can't do it without  
24 both being present.

25 Q You were also asked several questions about

1 Georgia-specific information. Could you tell us why  
2 Georgia-specific information is relevant to this  
3 proceeding in Florida?

4 A Yes, ma'am. As I discussed in my summary, and  
5 earlier, the interfaces, and BellSouth's operations  
6 support systems, are common across all nine states. So  
7 if it doesn't work in Georgia, it's not going to work in  
8 Florida. So until we solve the problems in Georgia,  
9 we're reluctant to start things here.

10 I would want to point out that we have  
11 recently begun service readiness testing for our  
12 business markets here in Georgia. We have sent over a  
13 number of orders in the last three weeks. We have had  
14 12 completions. So there is a small scale trial for  
15 business going on. And it's a trial. Again, we're  
16 using AT&T employees as surrogates for customers. So  
17 it's not service to paying revenue provision customers,  
18 but it is a trial that's underway.

19 Q Was that in Florida or Georgia?

20 A That is in Florida.

21 Q Mr. Ellenberg asked you some questions about  
22 LENS and how LENS deals with various situations. How  
23 does LENS respond to a bad address?

24 A LENS responds to a bad address by returning to  
25 you a potential list of good addresses. You can then

1 try one of those good addresses in place of the one  
2 you're looking at.

3 Q Do you know how RNS responds to a bad address?

4 A In a similar fashion. It returns a list  
5 also. One of the differences is if it returns that  
6 list, you can move right down to and highlight the  
7 alternative that you want and have it automatically  
8 populate the order, whereas in the LENS system you have  
9 to do some manual work to do that.

10 Q Mr. Ellenberg also asked you some questions  
11 about recent changes to LENS. To your knowledge, how  
12 often has BellSouth made changes to LENS?

13 A I know of official releases that have occurred  
14 in June, July, August and September. From using the  
15 system hands on, week in week out, I see changes, not  
16 exactly every week, but probably every other week. A  
17 screen will be different, a capability will be there  
18 that wasn't before. Most of those are not noticed. In  
19 fact, almost all of them are not noticed to the user  
20 community. The release notes, which you saw on the  
21 first screen of LENS, there's a box that says "release  
22 notes," have not been updated since July 17th or 18th.  
23 So they don't reflect September and August changes.

24 Q How does AT&T find out about changes to LENS  
25 in those cases?



1           A     We don't, unless we just stumble on them while  
2 we're using them.

3           Q     Can AT&T build a front end system to talk to  
4 LENS at this point?

5           A     No, ma'am, we cannot.

6           Q     Why not?

7           A     We don't have the specifications to describe  
8 LENS as it exists today. The last CGI specification was  
9 withdrawn. The HTML description, dated 4-28, describes  
10 LENS as of 4-22.

11          Q     Are you familiar with Ms. Calhoun's Late-filed  
12 Deposition Exhibit No. 1?

13          A     I don't recall it specifically, but I've seen  
14 it.

15          Q     Okay, do you recall Staff asking Ms. Calhoun  
16 for CGI specifications in her deposition?

17          A     Yes, I do.

18          Q     And you accept that that's Late-filed  
19 Deposition Exhibit No. 1?

20          A     I would accept that, yes.

21          Q     Have you had a chance to review what she  
22 provided in response to that question?

23          A     Yes. That turns out to be the 4-28  
24 specification that I mentioned just a minute ago. It is  
25 the hyper text markup language description of the pages

1 as they were on April 22nd of this year.

2 Q So is that CGI specifications?

3 A No, it is not.

4 Q Mr. Ellenberg asked you some questions about  
5 the PIC selection process and suggested that CLECs would  
6 normally have to input only MCI, AT&T and Sprint PIC  
7 codes most of the time so they wouldn't need different  
8 functionalities. Can you please describe the PIC  
9 selection capabilities available to BellSouth  
10 representatives?

11 A In the RNS system they can type the first  
12 three or four letters of a carrier's name, it will  
13 search directly to it, bring up that carrier and their  
14 identification.

15 Q Do you have your copy of the FCC's Ameritech  
16 order in front of you?

17 A Yes, ma'am.

18 Q Could you turn to paragraph 139, please?

19 A Yes, ma'am.

20 Q Now Mr. Ellenberg asked you several questions  
21 in which he suggested that the standard by which their  
22 system should be judged is whether it offers CLECs a  
23 meaningful opportunity to compete.

24 Could you tell me from looking at paragraph  
25 139 what the FCC's standard is for judging parity for

1 systems -- for functions provided to competing carriers  
2 that are analogous to OSS functions that a BOC provides  
3 to itself?

4 A Out of the middle of that paragraph I would  
5 read a sentence that says, "We conclude that equivalent  
6 access, as required by the Act and our rules, must be  
7 construed broadly to include comparisons of analogous  
8 functions between competing carriers and the BOC, even  
9 if the actual mechanism used to perform the function is  
10 different for competing carriers than for the BOC's  
11 retail operations."

12 Q And at the beginning of paragraph 139, where  
13 it says, "The BOCs must provide access to competing  
14 carriers that is equal to the level of access that the  
15 BOC provides itself," is that a different standard than  
16 the meaningful competition standard that Mr. Ellenberg  
17 was asking you about?

18 A It is.

19 Q Could you turn also to Page -- or I'm sorry,  
20 to paragraph 140.

21 A Yes, ma'am.

22 Q There the FCC states that the OSS functions  
23 associated with preordering, ordering and provisioning  
24 for resale services and repair and maintenance for both  
25 resale and unbundled network elements all have retail

1 analogs. Do you recall whether Mr. Ellenberg was asking  
2 you about functions that fell into the preordering,  
3 ordering and provisioning categories?

4 A I remember quite a lot of questions about  
5 those, yes, ma'am.

6 Q So what would the standard then be used to  
7 judge those functions? Meaningful opportunity to  
8 compete or equal to the level of access?

9 A It should be equal to the level of access.

10 Q That BellSouth provides to itself?

11 A That BellSouth has to itself for its analogs.

12 MS. RULE: Thank you. No further questions.

13 CHAIRMAN JOHNSON: Exhibits?

14 MS. RULE: AT&T would move Exhibits No. 99,  
15 100, 101, and we would also like to have marked as an  
16 exhibit the chart drawn by Mr. Bradbury, but I'm sorry,  
17 I haven't kept track of that number.

18 CHAIRMAN JOHNSON: We're on Exhibit 103.

19 MS. RULE: Have that marked as 103.

20 CHAIRMAN JOHNSON: No, I think we're on 104.

21 (Exhibit No. 104 marked for identification.)

22 MS. RULE: Sorry. Would move 99, 100, 101 and  
23 104.

24 MS. BARONE: Staff moves 102.

25 MR. ELLENBERG: BellSouth objects to 102, or

1 at least part of it, Chairman Johnson. 102 is the  
2 deposition of Mr. Bradbury, as well as the late-filed  
3 exhibits. BellSouth is only objecting to what  
4 constitutes Late-filed Deposition Exhibit JB-1, which I  
5 believe -- the numbers are very faded on my Xerox  
6 copies. I think that's Page 1 through 353.

7           As was revealed on cross-examination, this is  
8 a hodge-podge of correspondence, e-mails, transcriptions  
9 of voice mails and other items that Mr. Bradbury had  
10 selected from his files. It's incomplete, as he  
11 indicated he had culled documents out of it. It has  
12 materials in it that are not responsive in any way to  
13 the request that Staff made during the course of the  
14 deposition.

15           It's supposed to be documentation that  
16 supports his position. If these documents were indeed  
17 important and were in support of his position, they  
18 could have been attached to his testimony and BellSouth  
19 and the Commission wouldn't be in the posture of having  
20 to deal with a 353-page exhibit during cross.

21           For all the reasons I stated, I don't think  
22 it's appropriate for this volume of information to come  
23 in as it did after the discovery deadlines had closed,  
24 after BellSouth would have an opportunity to explore and  
25 identify and deal with these materials. I think it's a

1 question of fairness.

2 MS. RULE: Commissioners, I would like --

3 CHAIRMAN JOHNSON: Hold on. Let me let  
4 Staff.

5 MS. BARONE: Madam Chairman, it did come in on  
6 August 22nd, and BellSouth has had an opportunity to  
7 cross on it. I would note, however, that there are over  
8 300 pages and I have not had an opportunity to review  
9 every single page, and I would be concerned about  
10 discarding the entire exhibit because I don't know if  
11 some of it is responsive or not responsive.

12 So I would want the opportunity to look at  
13 that information, see if we can glean information that  
14 we do need, and the parties are free to argue whether  
15 it's relevant or not within their briefs, and you can  
16 give it the weight that you see fit.

17 CHAIRMAN JOHNSON: Okay. Now, this is JD-1,  
18 which was Pages 1 through 352?

19 MR. ELLENBERG: As best I can read the  
20 numbers, that's correct. It's a five-page index of  
21 approximately 91 items, 100 plus letters and other  
22 matters, and it's a total of 353 pages, many of which  
23 were not written either by this witness or responded to  
24 by this witness.

25 CHAIRMAN JOHNSON: I'm going to go ahead and

1 allow the admission of everything except for the pages  
2 that you -- the document that you've mentioned, the  
3 pages you've mentioned, and give Staff an opportunity to  
4 review them.

5           There were -- through his cross-examination,  
6 there were several issues raised, that at least in my  
7 mind initially, and I don't have the documents here,  
8 raise some question as to whether or not they were  
9 responsive to the request. So if you could review those  
10 documents and then get back with us. We may be  
11 finishing up today, so we'll work that out logistically,  
12 but I'll give you opportunity to review those.

13           MS. RULE: Commissioners, could I have  
14 Mr. Ellenberg tell again which specific documents he  
15 objects?

16           MR. ELLENBERG: It is the entire Late-filed  
17 Deposition Exhibit JB-1.

18           MS. RULE: Yes, but I believe you specifically  
19 listed a couple within those and I would like to know  
20 those.

21           MR. ELLENBERG: No, I object to the entire  
22 exhibit.

23           CHAIRMAN JOHNSON: So you're --

24           MR. ELLENBERG: I object to the entire JB-1.

25           MS. RULE: Commissioners --

1           CHAIRMAN JOHNSON: Is it -- and see, because I  
2 don't have the text here, the entire exhibit is the  
3 three -- the composite exhibit is 1 through Pages 352,  
4 or is there more than that?

5           MR. ELLENBERG: The composite exhibit is 102.  
6 That's the deposition. And I'm not objecting to the  
7 deposition. And I believe there were seven late-filed  
8 exhibits requested. I'm only objecting to one of  
9 those.

10           MS. BARONE: Yes, ma'am. The composite  
11 consists of the deposition, the errata sheet and seven  
12 late-filed deposition exhibits. He's only objecting to  
13 No. 1. And it's my understanding, when I was listening  
14 to BellSouth, that they objected to a few. Now if I  
15 knew specifically what they were objecting to, we could  
16 work this out. But now it appears he's objecting to the  
17 entire document. And my concern is we're going to throw  
18 everything out, that there may be something relevant.

19           MR. ELLENBERG: I suggest we talk to Staff  
20 during the next break about particular items in this  
21 that might be tossed out, and we can deal with it later  
22 this afternoon.

23           MS. RULE: Commissioners, I would like to  
24 address this, too, since it's basically my exhibit for  
25 AT&T. I would like to direct you to the Staff request.



1 The Staff request in Mr. Bradbury's deposition was very  
2 broad, and it did -- or Staff did specifically ask for,  
3 on Pages 7 and 8, a late-filed exhibit in which you  
4 would list the proof that would support your claim of  
5 this discriminatory interface.

6           And this follows a discussion where they're  
7 basically asking him to prove his testimony with  
8 whatever he has. And we went off the record, discussed  
9 how broad that would be, and asked Mr. Bradbury to limit  
10 it to those things that were relevant to his testimony.

11           I would also like to point out that BellSouth  
12 has had that information for nearly two weeks and indeed  
13 they filed the revised SGAT after this. So apparently  
14 filing things late is not bad if they do it; it's bad if  
15 we do it. If it's a relevance issue, you can let it  
16 come in and give it whatever weight you wish. I don't  
17 believe you've been in the practice of striking  
18 information because it's irrelevant.

19           CHAIRMAN JOHNSON: I'm going to allow Staff  
20 the opportunity to review this, because if some of the  
21 information is not responsive to what their request was,  
22 then we need to review that, and that would be  
23 unnecessary.

24           But Bell, I know you did delineate quite a few  
25 items in your cross-examination. Are you prepared to

1 tell us which documents you believe are not responsive?

2 MR. ELLENBERG: I can name a few that I have  
3 noted for purposes of cross-examination. I could not  
4 give an exhaustive list at this point. I just -- the  
5 only opportunity we would have had to deal with the  
6 witness on all of these documents would have been  
7 cross-examination. And had I attempted to cross on  
8 these and flesh out what his point was in offering all  
9 these, we would be here until Thanksgiving. And I'm  
10 just trying to deal with it the most expeditious way.  
11 If the witness believed these materials were important,  
12 they could have been attached to prefiled testimony, if  
13 we had had notice, and we could have dealt with them.  
14 But it's the volume of information combined with the  
15 timing and the responsiveness that I'm concerned with.

16 CHAIRMAN JOHNSON: Okay. I'll give Staff the  
17 opportunity to review the document, and to the extent  
18 that you find that there are portions of it that were  
19 not responsive to your request, then we will deal with  
20 that at this time. But I will not admit JB-1 at this  
21 time.

22 (Exhibit Nos. 99, 100, 101, 102 and 104  
23 received into evidence.)

24 CHAIRMAN JOHNSON: Any other matters  
25 concerning this witnesses?

1 COMMISSIONER KIESLING: What about Exhibit  
2 103?

3 MR. ELLENBERG: And BellSouth moves Exhibit  
4 103.

5 CHAIRMAN JOHNSON: Show that admitted without  
6 objection.

7 (Exhibit No. 103 received into evidence.)

8 CHAIRMAN JOHNSON: Anything else? You're  
9 excused.

10 WITNESS BRADBURY: Thank you, ma'am.

11 (Witness Bradbury excused.)

12 \* \* \*

13 CHAIRMAN JOHNSON: We'll take a ten-minute  
14 break.

15 (Recess from 2:25 p.m. until 2:40 p.m.)

16 CHAIRMAN JOHNSON: We're going to go back on  
17 the record.

18 MR. WIGGINS: Call Mr. Lans Chase to the stand  
19 please. Mr. Chase, have you been sworn?

20 WITNESS CHASE: Yes.

21 MS. WHITE: I'm sorry, just as a preliminary  
22 matter, BellSouth has handed out copies of Late-filed  
23 Hearing Exhibit No. 40, as well as Late-filed Hearing  
24 Exhibit No. 59. No. 40 is proprietary. The  
25 commissioners have a redacted version. No. 59 was -- I

1 did not give you a copy because Ms. Barone said I didn't  
2 have to.

3 MS. BARONE: It's huge.

4 MS. WHITE: Fifty-nine says it's proprietary,  
5 but that is in error. It is not proprietary, but 40 is,  
6 because it has customer information on it.

7 COMMISSIONER KIESLING: But we're not going to  
8 get either?

9 COMMISSIONER GARCIA: We don't have either,  
10 right?

11 MS. WHITE: I've got copies of 59 I can give  
12 you. You have 40 because I put it on your --

13 COMMISSIONER GARCIA: This one?

14 MS. WHITE: That's 40. And I'll be glad to  
15 give copies of 59.

16 J. LANS CHASE

17 was called as a witness on behalf of Intermedia  
18 Communications, Inc., and having been duly sworn,  
19 testified as follows:

20 DIRECT EXAMINATION

21 BY MR. WIGGINS:

22 Q You have been sworn, Mr. Chase?

23 A Yes.

24 Q Please state your name and business address.

25 A My name is J. Lans Chase, 135 West Central

1 Boulevard, Suite 1050, Orlando, Florida 32801.

2 Q By whom are you employed?

3 A Intermedia Communications.

4 Q Did you cause to be submitted in this docket  
5 23 pages of direct testimony, including three exhibits,  
6 JLC-1, 2 and 3?

7 A Yes, I did.

8 Q Did you also cause to be submitted in this  
9 docket rebuttal pages consisting of -- rebuttal  
10 testimony consisting of ten pages?

11 A Yes.

12 Q Do you wish to have this testimony inserted  
13 into the record as is, or do you have moves, adds or  
14 changes?

15 A No, I do have a few changes.

16 Q Why do you have those changes?

17 A On the date that my rebuttal -- my rebuttal  
18 testimony was filed on July 31st. Since that date,  
19 Intermedia has changed the way they submit their switch  
20 "As-Is" orders for resale. We are now using the  
21 Harbinger PC EDI, and I've got a few corrections or  
22 changes that would more accurately reflect my testimony  
23 because of that.

24 Q What is your first change?

25 A First change is on the direct, Page 3,

1 Line 17.

2 MR. MARKS: Mr. Wiggins, is this the direct?

3 MR. WIGGINS: Yes.

4 MR. MARKS: Testimony?

5 MR. WIGGINS: Yes.

6 MR. MARKS: Okay.

7 WITNESS CHASE: The first change is on the  
8 direct testimony, Page 3, Line 17, strike the word  
9 "current" and replace it with "manual." Then on Line  
10 23, insert the word "manual" between "the" and  
11 "system."

12 MR. MARKS: Mr. Wiggins, I apologize. I was  
13 trying to grab his testimony and I didn't have it at the  
14 time. Could he go back over those changes?

15 MR. WIGGINS: Yes, I believe he said on  
16 Line 17, Page 3, strike the word "current," insert the  
17 word "manual." And on Page 23 of line -- on Line 23 of  
18 Page 3 insert the word "manual" before "system."

19 WITNESS CHASE: The next change I have is on  
20 Page 5 of my direct. Line 20, strike the word -- the  
21 last word of that line, "is" and replace "was." And  
22 then on Line 21 strike the words "currently being  
23 tested" and replace it with "implemented." And then add  
24 at the end of that sentence, "after ICI in August of  
25 1997."

1 Q (By Mr. Wiggins) That would now read then,  
2 therefore, "was implemented by ICI in August of 1997"?

3 A Correct.

4 The next change is on Page 6 of the direct,  
5 Line 22, beginning with the word "mostly," strike from  
6 there to the end of that line, so now that the  
7 sentence -- the question reads: "So in summary, in  
8 placing switch "As-Is" orders with BellSouth, ICI  
9 submits electronic LSRs," and so forth.

10 Next change is on Page 7 of the direct, Line  
11 10, strike the entire line, beginning with "We are  
12 currently," through the beginning of next line 11, and  
13 then the next sentence beginning with "This," strike the  
14 word "modified," so that the sentence now reads, "This  
15 LSR form..."

16 Q And just to be clear, that means the entire  
17 sentence beginning on Line 10 has been struck?

18 A Yes. The next is on Page 9 of the direct  
19 testimony, Line 13. Strike the word "time" and replace  
20 it with "tone," so that it reads BellSouth appears to  
21 have corrected the dial tone interruption problem.

22 And then on that same page, Line 24, the  
23 question, strike the word "does," replace it with "has"  
24 and change the word "happen" to "happened." So that now  
25 that the question reads, "How often has this not

1 happened?"

2           The next change is on Page 10, Line 9,  
3 beginning with the sentence, "For example," strike that  
4 entire sentence, and all the lines through Line 18.

5           Q     So the remainder of the paragraph is struck?

6           A     Correct.

7           Q     Do you have another change to make on that  
8 page? Line 22? Well, maybe not.

9           A     Yes, on Line 22, I want to strike the word  
10 "and," and then on Line 23 strike "correct" -- the  
11 words "correct" and "CSR," so now it reads, "Once we  
12 receive the FOC, we still have..."

13          Q     Thank you.

14          A     The next is Page 22. Strike in its entirety  
15 Lines 3 through 8.

16          Q     Does that complete the changes to your direct  
17 testimony, excluding the exhibits?

18          A     Yes.

19          Q     Do you have a modification for the title of  
20 JLC-1?

21          A     Yes, I would just like to clarify that title  
22 by adding --

23                COMMISSIONER CLARK: Mr. Wiggins, hang on just  
24 a moment. If you're striking the answer on 22, why  
25 don't you strike the question on 21?



1 MR. WIGGINS: I think we still have two lines  
2 there, Commissioner Clark, answering a question.

3 COMMISSIONER CLARK: I thought you said strike  
4 the entire paragraph.

5 MR. WIGGINS: I hope I said the remainder of  
6 the paragraph. I apologize if I did not.

7 WITNESS CHASE: Just strike Lines 3 through 8,  
8 leaving the answer just as Lines 1 and 2.

9 Q (By Mr. Wiggins) The clarification you would  
10 like to make to the title of JLC-1?

11 A Yes, I would like to add to the end of the  
12 title of Exhibit JLC-1, "For Switch 'As-Is,' Paper  
13 LSR."

14 COMMISSIONER KIESLING: Could I get a  
15 clarification? That title now would read, "Intermedia  
16 Communications Customer Operations-BellSouth Resale  
17 Process For" -- is that where I'm supposed to put this?

18 WITNESS CHASE: Correct.

19 COMMISSIONER KIESLING: "For Switch 'As-Is.'"

20 WITNESS CHASE: Paper LSR.

21 Q (By Mr. Wiggins) Do you have the changes for  
22 your rebuttal testimony?

23 A Yes, just a few. Page 3 now of the rebuttal  
24 testimony. Page 3, beginning with the question on Line  
25 16, strike "could" and replace with "does." And then on

1 Line 18, the answer should read "yes."

2           And then strike, "we could but at this time we  
3 do not." And then on Line 22, insert, after the word  
4 "Intermedia," "also sometimes" so that that sentence  
5 now reads, "For these conversions Intermedia also  
6 sometimes uses the IC/REF."

7           The next change of the rebuttal, Page 4,  
8 Line 2, strike the word "and" and replace it with so.  
9 And then on the same line, insert, after the word "no"  
10 the word "clear," so that now that phrase reads, "So  
11 there is no clear advantage at this time to use LENS for  
12 this purpose."

13           Next change is on Page 5, Line 12, insert  
14 after the word "testing" the words "of MAC orders,"  
15 capital M-A-C orders.

16           And then the next, Line 13, strike "will"  
17 after the word "Intermedia," and change "use" to "uses."

18           And then on Line 14, strike the words "and MAC."

19           And the final change is on Page 10, Line 8,  
20 after the word -- the end of Line 8, "preordering,"  
21 change the period to a comma and add, "and EDI for  
22 placing switch 'As-Is' orders." Again, it should read  
23 comma "and EDI for placing switch 'As-Is' orders."

24           And then same page, last correction, Line 13,  
25 strike the last three words, "and until LENS," and then

1 on Line 14 strike the first part of that, "can be used  
2 for MAC orders."

3 Q Thank you. Mr. Chase, with those changes that  
4 you have indicated, if I asked you the questions  
5 contained in both your prefiled direct testimony and  
6 prefiled rebuttal testimony, would your answers be the  
7 same?

8 A Yes.

9 MR. WIGGINS: Madam Chairman, I move that the  
10 prefiled direct and rebuttal be inserted into the record  
11 as though read.

12 CHAIRMAN JOHNSON: It will be so inserted.

13 MR. WIGGINS: Could we get Exhibits JLC-1, 2  
14 and 3 marked as a composite, please?

15 CHAIRMAN JOHNSON: JLC-1 through 3 will be  
16 marked as Composite Exhibit 105.

17 (Exhibit No. 105 marked for identification.)  
18  
19  
20  
21  
22  
23  
24  
25

1 Q: Please state your name, address and on whose behalf  
2 you are testifying.

3 A: My name is J. Lans Chase. My address is 135 West  
4 Central Boulevard, Suite 1050, Orlando, Florida 32801.  
5 I am testifying on behalf of Intermedia Communications  
6 Inc. (ICI).

7 Q: What is your relationship with ICI?

8 A: I am an employee of ICI. As the Manager of Local  
9 Resale Provisioning for ICI, I am responsible for the  
10 provisioning of all local resale orders for ICI. Once  
11 a customer of BellSouth (BST) decides to become an ICI  
12 local resale customer, my department submits the order  
13 to BST to have the customer converted to ICI local  
14 resale. In addition, it is my responsibility to  
15 confirm that the order is completed and that the  
16 requisite customer information is entered into ICI's  
17 billing system.

18 **PURPOSE OF TESTIMONY**

19 Q. What is the purpose of your testimony?

20 A. The purpose of my testimony is to describe the systems  
21 in place for converting BST customers to ICI resale  
22 customers and the problems we have experienced with  
23 these systems to date. My testimony relates to Issue  
24 15 in this docket. I believe that a simple  
25 description of these systems and problems establishes  
26 beyond reasonable debate that ICI does not enjoy

1 parity with BST in the conversion of a resale customer  
2 from one company to the other.

3 Q. As an introduction to your testimony, please explain  
4 why you believe that parity does not exist between  
5 BellSouth and ICI with respect to conversion of resale  
6 customers.

7 A. Perhaps the best way to explain the basis of my  
8 opinion that there is no parity is to look at the  
9 process simply from the perspective of conversion  
10 time. If an ICI resale customer wants to convert back  
11 to BST for any reason, he or she can do that in one  
12 day. The customer simply calls BST and has the service  
13 switched almost instantly, with or without changes to  
14 the service itself. On the other hand, if a BST  
15 customer wants to convert his or her service to ICI,  
16 it takes two working days if things work perfectly.  
17 As will be shown, however, about a third of the time  
18 things do not work perfectly and in these cases it  
19 takes two to four weeks to achieve the conversion.  
20 This is not parity.

21 **TYPES OF RESALE ORDERS**

22 Q. What types of resale orders does ICI place with BST?

23 A. ICI primarily places two types of resale orders with  
24 BST: switch "As-Is" orders and "Move, Add, or Change"  
25 (MAC) orders."

26 Q. What are switch "As-Is" orders?

1 A. Switch "As-Is" orders are the initial conversion  
2 orders used to make a BST customer an ICI local resale  
3 customer. Under a switch "As-Is" order the customer  
4 retains the same features and services as obtained  
5 from BST. The customer is no longer billed by BST;  
6 instead, BST bills ICI for services and features, and  
7 ICI then bills the customer for local resale services.

8 Q. What are "Move, Add, or Change" (MAC) orders?

9 A. MAC orders are placed with BST after the customer is  
10 an ICI local resale customer. These orders typically  
11 are triggered when an ICI customer requests changes in  
12 service, such as the addition of a line or a new  
13 feature such as call waiting. When ICI receives such  
14 a request, it must place a MAC order with BST to make  
15 these changes.

16 **"AS-IS" CONVERSIONS**

17 Q. Please describe the <sup>manual</sup>~~current~~ system for placing an  
18 order to BST to convert a customer to "As-Is" resold  
19 service.

20 A. Unfortunately, the process is complex, cumbersome,  
21 time-consuming and prone to errors that undermine  
22 ICI's marketing efforts. The simplest way to describe  
23 the <sup>manual</sup> system is with a process flow-chart, which I have  
24 attached to this testimony as Exhibit 1. As one can  
25 readily see from that exhibit, the process includes  
26 numerous steps and is labor intensive.

- 1 Q. Please give a brief narrative summary of this system.
- 2 A. First of all, to place a switch "As-Is" order, ICI  
3 must complete a local service request (LSR) form.  
4 This form identifies who is submitting the order for  
5 ICI, as well as the ICI billing address. The LSR also  
6 contains information such as the name, address, and  
7 main account (billing) telephone number of the end-  
8 user customer. The LSR also identifies all of the  
9 end-user telephone numbers to be converted to ICI for  
10 local resale.
- 11 Q. How are these completed forms generated and delivered  
12 to BST?
- 13 A. The information described above is entered into an ICI  
14 database that prints out each LSR in the industry  
15 standard format adopted by the Ordering and Billing  
16 Forum. On average, it takes about 15 minutes to enter  
17 the information for each LSR. The printed LSRs are  
18 sent daily via overnight mail to the BST local carrier  
19 service center (LCSC), which is the business office  
20 order center created by BST to process the CLEC local  
21 resale orders.
- 22 Q. What happens after the LCSC receives the LSRs?
- 23 A. From the printed LSRs, BST issues the appropriate  
24 orders in the BST system to convert the end user to  
25 ICI "As-Is." Once these orders are issued, BST faxes  
26 to ICI firm order confirmations (FOCs) and a copy of

1 the BST customer service records (CSRs). The FOC  
2 contains the BST order numbers and date that the  
3 conversion will take place. The CSR is a complete  
4 record of the end user's features and services. The  
5 FOC and CSR are supposed to be faxed to ICI within 48  
6 hours, but often this does not happen.

7 Q. What is the next major step?

8 A. The ICI local resale billing coordinators take the FOC  
9 and CSR and enter the items into ICI's billing service  
10 data base using the date of conversion contained on  
11 the FOC. The billing data entry takes about 6-10  
12 minutes depending on the size of the account.

13 Q. Is the submission of a printed LSR the only method to  
14 convert a customer?

15 A. No. Currently BST has two additional alternative  
16 methods to place switch "As-Is" orders. Under the  
17 first alternative, BST has introduced an EDI software  
18 package that allows switch "As-Is" orders to be placed  
19 via a dial-up arrangement to a Value Added Network.  
20 This was introduced in late April 1997 and <sup>was</sup> ~~is~~  
21 ~~currently being tested~~ <sup>implemented</sup> by ICI. <sup>in August of 1997.</sup>  
22 The "electronic LSR"  
23 contains the same information as the printed LSR.  
24 This "electronic LSR" process is not yet a significant  
25 method through which ICI places customer conversion  
26 orders with BST.

The second alternative method to submit switch



1 "As-Is" orders is BST's Local Exchange Navigation  
2 System (LENS). This system allows CLECs to process  
3 switch "As-Is" LSRs with BST through a web graphical  
4 user interface.

5 Q. Has the LENS system proved to be the cure for the  
6 problems ICI has experienced in obtaining conversions  
7 from BST?

8 A. No. This system is still in its infancy; it was only  
9 introduced in mid-May 1997. ICI has done some switch  
10 "As-Is" test orders through LENS, but primarily uses  
11 it only for pre-ordering. I will address LENS again  
12 in the context of parity.

13 Q. What is pre-ordering?

14 A. Pre-ordering is the gathering of certain information  
15 necessary to complete the local resale order. It  
16 includes verifying the address of the end-user,  
17 checking the availability of service and features in  
18 the end-user's central office, assigning telephone  
19 numbers, and verifying the end-user's main account  
20 (billing) number.

21 Q. So in summary, in placing switch "As-Is" orders with  
22 BST, ICI ~~mostly submits printed LSRs, sometimes~~  
23 submits "electronic" LSRs using the EDI software  
24 package, and almost never submits orders through LENS?

25 A. That is correct.

1     **MAC ORDERS**

2     Q.    Describe the system for placing MAC orders with BST.

3     A.    This process is also complex, cumbersome, time  
4           consuming and prone to errors. Attached as Exhibit 2  
5           is a flow chart describing the MAC system.

6     Q.    Please give a brief narrative summary of thee MAC  
7           order system.

8     A.    To place a MAC order with BST, ICI must again complete  
9           an LSR form, which takes about 20 minutes on average.  
10          ~~We are currently using BST's modified LSR to submit~~  
11          ~~MAC orders.~~ This ~~modified~~ LSR form contains the  
12          following basic information: (1) identity of the  
13          person placing the order on behalf of ICI; (2) ICI's  
14          address for billing; (3) name, address, and main  
15          account (billing) telephone number of the end-user  
16          customer; (4) all of the end-user telephone numbers  
17          that are being changed; and (5) identification of the  
18          changes to be made.

19    Q.    Does ICI have to perform pre-ordering verification  
20          before submitting the MAC LSR?

21    A.    Yes. As with switch "As-Is" orders, before placing  
22          the MAC order ICI must verify that the address of the  
23          customer is correct and that the feature or service  
24          requested is available in the customer's central  
25          office. This can be done using BellSouth's LENS  
26          system.

1 Q. What happens next?

2 A. We fax the modified printed LSR form to BST. BST  
3 takes the form and issues the appropriate service  
4 orders to make the requested changes. BST then faxes  
5 the firm order confirmation (FOC) back to ICI with the  
6 date the services will be added. BST is supposed to  
7 send the FOC back to ICI within 48 hours. Once the  
8 FOC is received, the ICI MAC coordinator calls the  
9 customer to give him or her the due date. The local  
10 resale billing coordinators then enter the changes  
11 into ICI billing system.

12 **PROBLEMS WITH "AS-IS" CONVERSIONS**

13 Q. You have described the system for placing "As-Is"  
14 LSR. Has Intermedia experienced any problems with  
15 having these orders met by BST?

16 A. Yes. We have experienced two basic kinds of problems.  
17 First, we have experienced delays and other quality of  
18 service problems from BST that have interfered with  
19 our competitive efforts. Second, the BST's entire LSR  
20 system imposes on ICI a high per-customer cost for  
21 achieving conversion and changes, which also impedes  
22 our ability to compete with BST.

23 Q. Please describe the delays and quality of service  
24 problems to which you refer.

25 A. Initially we had a problem with some customers  
26 actually losing dial-tone due to the method BST uses

1 to make the resale conversion. It is my understanding  
2 that BST must treat a switch "As-Is" order as a dual-  
3 request, i.e., as a request to disconnect the customer  
4 from BST and as a separate request to reconnect the  
5 customer to ICI. Thus to achieve this simple switch  
6 "As-Is," BST must issue two orders within its system:  
7 first, a disconnect order and second, a reconnect  
8 order. To reiterate, when ICI first began sending  
9 LSRs to BST for switch "As-Is" conversions, BST  
10 literally disconnected the customer at the central  
11 office. We had customers who experienced service  
12 interruption. BST appears to have corrected the dial  
13 ~~time~~<sup>tone</sup> interruption problem by handling an "As-Is"  
14 conversion as a records change not requiring hardware  
15 changes.

16 Q. What is the major quality of service problem?

17 A. The major problem we have experienced and continue to  
18 experience with the switch "As-Is" conversions is that  
19 BST has taken too long to provide the FOC and the CSR  
20 to ICI after we have submitted the LSR. Although  
21 BST's goal is to have a complete and accurate FOC and  
22 CSR to ICI within 48 hours of receiving the LSR, this  
23 often does not happen.

24 Q. How often ~~does~~<sup>has</sup> this not ~~happen?~~<sup>happened</sup>

25 A. Too often. This is a huge problem; we simply are not  
26 receiving the FOCs and CSRs from BST within the 48

1 hour period. Sometimes we received the FOC and an  
2 incomplete CSR, or worse, no CSR at all. For example,  
3 we may send 100 LSR orders in one week. Two weeks  
4 later, for 30 to 40 of the LSRs, we will not have the  
5 corresponding FOC and CSR.

6 Q. What impact does this have on ICI?

7 A. From a cost perspective, it requires ICI to divert  
8 resources to address the backlog and other problems  
9 with the FOCs and CSRs. ~~For example, I have one~~  
10 ~~person that spends about 15 hours a week checking the~~  
11 ~~status of backlogged orders. She is continually on~~  
12 ~~the phone with the LCSC requesting FOC dates and CSR.~~  
13 ~~She routinely compiles lists of outstanding orders~~  
14 ~~faxes them to BST. BST then compiles the information~~  
15 ~~on these orders and sends this information to ICI via~~  
16 ~~overnight mail or fax. In short, it is a continuing~~  
17 ~~struggle for everyone involved in this process to make~~  
18 ~~sure all orders are timely handled by BST.~~

19 Q. Once BST provides ICI the late FOC and CSR are ICI's  
20 problems cured?

21 A. No. Unfortunately, the initial delays cause further  
22 problems down the line. Once we receive the FOC ~~and~~  
23 ~~correct CSR~~, we still have to enter the data into our  
24 billing system, even though the actual order may have  
25 been worked months ago. Therefore, when we enter an  
26 install date into our billing system, the customer is

1 hit with a very large first bill. This is a frequent  
2 problem. Customer service receives phone calls daily  
3 from customers asking why it takes so long to be  
4 converted to ICI local resale.

5 Q. Are there other problems as a result of these delays?

6 A. Yes. Sometimes BST continues to bill customers who  
7 have signed up with ICI but whose conversion is  
8 delayed. This confuses the customer and casts ICI in  
9 a bad light.

10 Q. Are there any other quality of service problems?

11 A. Yes. Other problems with conversion orders come about  
12 when we are trying to do a switch "As-Is" on a complex  
13 service such as ISDN, Centrex or Dedicated circuits.  
14 The LCSC cannot process these orders and must forward  
15 them to the BST Interconnection Services Account Team  
16 to process. Nevertheless, there have been instances  
17 where the LCSC has sent FOCs and CSRs for complex  
18 services to ICI before BST has actually processed the  
19 orders. As a result, the customer ends up receiving  
20 a bill from both ICI and BST. From the customer's  
21 perspective, ICI billed prematurely, although the true  
22 source of the problem is that BST provided us with FOC  
23 and CSR before the accounts were converted to ICI.

24 **PROBLEMS WITH MAC ORDERS**

25 Q. Has Intermedia experienced any problem with MAC  
26 orders?

1 A. Yes. ICI has experienced many problems with MAC  
2 orders and these problems have hurt its relationship  
3 with customers and its ability to compete with BST.  
4 In fact, the problems with MAC orders have probably  
5 harmed ICI more than the problems with switch "As-Is"  
6 orders.

7 Q. Please explain.

8 A. Once the customer subscribes to ICI local resale, he  
9 or she must call ICI to make any changes, additions,  
10 or moves of the service. The customer calls ICI with  
11 the expectation that ICI can add or change the service  
12 as quickly as BST or perhaps more quickly. With the  
13 current processes, however, this simply is not  
14 possible. As noted in the description of the MAC LSR  
15 process, ICI must take the call from the customer and  
16 then complete the LSR form which is then faxed to the  
17 LCSC center. The BST representative then takes the  
18 fax and enters the request and sends an FOC back to  
19 ICI with the due date for the service change. As with  
20 "As-Is" conversions, often this is not a smooth  
21 process.

22 Q. What kinds of problems does ICI experience with these  
23 MAC requests?

24 A. As already noted the process is complex, cumbersome,  
25 time consuming and prone to errors, so we experience  
26 the delays, miscommunications, and mistakes one might

1           expect. Perhaps the best way to describe the problem  
2           with MAC orders is to provide a hypothetical but  
3           realistic example. An ICI local resale customer  
4           orders call waiting, caller ID and voicemail and wants  
5           these features as soon as possible. ICI completes the  
6           LSR to add these features having first to verify the  
7           address and the feature availability for the  
8           customer's central office. ICI then faxes the LSR to  
9           the LCSC with a desired due date of 2 days. Two days  
10          later, the customer calls ICI customer service asking  
11          if the changes are complete. We have not received an  
12          FOC, so we must call BST to check the status.

13                 Perhaps the order was processed without our  
14          receiving an FOC. In that case, we get the order  
15          number and due date and relay that information to the  
16          customer. However, if BST says it never received the  
17          LSR, we must re-send the LSR asking for it to be  
18          expedited. By the time the order is worked, it might  
19          be 4 or 5 business days later. The customer is now  
20          upset with our service and does not care who is to  
21          blame. All the customer knows is that he or she does  
22          not have the requested changes.

23          Q.    So far you have addressed conversions where the  
24          customer's service location remains the same. Does  
25          ICI also experience problems when the customer  
26          relocates?



1 A. Yes. The MAC order problems are magnified when  
2 customers are requesting to physically move their home  
3 or business. When move orders are not completed, for  
4 any reason, customers could move to new location and  
5 not have dial tone. This can put small companies out  
6 of business and put people at risk with no access to  
7 emergency 911.

8 **ADVERSE EFFECT OF CONVERSION PROBLEMS**

9 Q. What effect do these MAC conversion problems have on  
10 ICI's relationship with its new customers?

11 A. The effect has been adverse, and in many instances,  
12 fatal. Many customers have been so frustrated that  
13 they switched back to BST.

14 Q. How does Intermedia learn that it has lost a customer?

15 A. BST is supposed to provide a letter to ICI that  
16 indicates transfer of the customer's main account  
17 telephone number and the date that the customer left  
18 ICI. Until the last couple of months, however ICI has  
19 not been receiving the notification letters. After we  
20 received the letter, we have to deactivate our local  
21 billing. Another way that we learn that we have lost  
22 a local resale customer is that the customer continues  
23 to receive an ICI bill after he or she has returned to  
24 BST, and the customer calls us to complain. We then  
25 have to cancel the local bill items and issue proper  
26 credits.

1 Q. Do you have any actual examples of lost customers due  
2 to delays in processing LSRs?

3 A. We have numerous examples, but two will suffice for  
4 the purposes of illustration.

5 Example 1: This is a MAC order problem. On Wednesday  
6 May 13, 1997, Customer A called ICI customer service  
7 to request to physically move its service by May 16,  
8 1997. An ICI MAC coordinator completed the LSR and  
9 sent it to BST with that due date. On the 16th,  
10 Customer A called ICI to check the status of the move  
11 order. We had not received an FOC with the due date  
12 and order numbers. An ICI MAC coordinator then called  
13 BST to determine whether the order had been worked.  
14 The order was complete but the LCSR representative  
15 said that the system's best due date was Monday, May  
16 19, 1997.

17 ICI called Customer A back to say that the move  
18 could not be completed on the 16th. Customer A was  
19 very angry and said the company would call BST and  
20 switch back, which is what happened. The regular BST  
21 business office was able to get a due date of May 17,  
22 1997, two days earlier than the date LCSR gave ICI.  
23 In fact, on Saturday the 17th, the BST business office  
24 representative called ICI to say that we must cancel  
25 the pending order with the LCSC, so that a new order  
26 could be issued to complete the move on that day.

1       Example 2: This example involves problems both with  
2       the original conversion and with later attempts to  
3       change service. On February 10, 1997, ICI sent an LSR  
4       to BST convert Customer B for local resale. We  
5       finally received the FOC and CSR and entered the local  
6       items into ICI's billing system on March 1, 1997 with  
7       an actual conversion date of February 11, 1997. On  
8       April 22, 1997, the customer called ICI customer  
9       service stating she received a bill from ICI and BST  
10      for the same period for local service. Customer B  
11      stated that she called BST who claimed that Customer  
12      B was still with BST. I called BST LCSC to verify if  
13      the account was converted to ICI on February 11, 1997  
14      as the FOC had stated. The BST LCSC showed no record  
15      of account ever being converted. I faxed a copy of  
16      the FOC that we received to the LCSC. LCSC reworked  
17      the order and back dated it to February 11, 1997. We  
18      called Customer B to state that she would receive a  
19      final bill from BST that will credit her service back  
20      to that date.

21             Customer B later decided to disconnect two lines.  
22      On June 12, 1997 ICI sent an order to BST LCSC to  
23      disconnect two of Customer B's lines and place  
24      recording on the lines that the numbers have been  
25      changed. The FOC stated that the two lines were to be  
26      disconnected on June 14, 1997. On June 18, 1997,

1 Customer B called ICI's customer service extremely  
2 upset because the recording on the lines stated the  
3 lines had been disconnected, not changed. An ICI MAC  
4 coordinator called LCSC to have them put the correct  
5 recording on the lines. The order was sent with the  
6 correct request for the recording to state that  
7 numbers had been changed, but the order was not  
8 completed correctly. Customer B's patience was  
9 apparently exhausted because she called BST and was  
10 converted back to BST effective June 20, 1997.

11 Q. Without disclosing confidential and proprietary  
12 business information, what is the scope of delay and  
13 lost customer problems?

14 A. Despite the problems we have experienced with BST  
15 conversion process, ICI has been able to keep the  
16 "switch-back" rate of customers we have won to  
17 approximately six percent. I believe that the  
18 overwhelming majority of the lost customers returned  
19 to BST due to problems caused by BST. Resale  
20 conversion should be transparent to the end-user, and  
21 the main reason a customer would transfer back is if  
22 it were not transparent, that is, if the customer  
23 experienced quality of service problems. Our main  
24 concern here, however, is not that we have lost six  
25 percent of our hard-won customers, but the effect  
26 BST's problems are having on the perception of ICI in

1 the market and the costs we are incurring to process  
2 conversion and service change orders.

3 Q. Please explain.

4 A. I have had departing customers say to me that they  
5 would not recommend ICI to other customers because of  
6 problems created by BST. Even if a prospective  
7 customer understands that BST is the source of service  
8 delays, double billing and other problems, he or she  
9 might reasonably decide to wait until the system runs  
10 more smoothly before choosing to use ICI. As a  
11 result, the problems with the conversion systems  
12 currently in place make it more difficult for ICI to  
13 convince a customer to take resold local service and  
14 to keep that customer if he or she wants service  
15 changes. In addition, these problems increase the  
16 cost ICI incurs in processing both the initial orders  
17 and later service changes. Of course, we have no way  
18 of knowing exactly how many customers choose not to  
19 use ICI because of the lack of parity in order  
20 processing. Nevertheless, I think it is reasonable to  
21 assume that whenever we lose a customer back to BST,  
22 we also lose the prospective customers he or she talks  
23 to.

24 **NO PARITY**

25 Q. With respect to the process of moving a customer from  
26 one company to the other, do you believe that ICI

1 enjoys parity with BST?

2 A. From my testimony about the problems we have  
3 experienced, it should be obvious that I do not  
4 believe there is parity. On the contrary, I believe  
5 that the problems we are experiencing are evidence of  
6 disparity. Specifically, there is no system available  
7 that gives ICI the same access to the pre-ordering and  
8 ordering functions as when a customer calls BST  
9 directly. The steps required for BST and ICI  
10 respectively to handle a move, add or change are  
11 listed in Exhibit 3.

12 Q. Please provide a narrative comparison of the MAC  
13 process for BST and ICI respectively.

14 A. When a customer calls BST the pre-ordering function  
15 (address validation, feature availability, telephone  
16 number reservation) and the ordering function are done  
17 while the customer is on the phone. When a customer  
18 calls ICI the pre-ordering information can be obtained  
19 via the LENS system; however, the LSR must be manually  
20 completed and faxed to BST.

21 For example, if a customer calls BST to add a new  
22 business line with voicemail, the customer is given at  
23 that time the new phone number, voicemail access  
24 number, voicemail password, and date service is due.  
25 But, if the customer calls ICI requesting the same  
26 order, ICI would be able to validate the address,

1 access feature availability, and reserve a phone  
2 number, but ICI could not give the customer a due date  
3 until the order has been processed by BST. As  
4 previously explained, the LSR would then have to be  
5 completed with the necessary service request including  
6 the reserved telephone number. ICI then has to wait  
7 for a faxed FOC that gives the due date and voicemail  
8 access number and password. If the FOC is not sent  
9 within the 48 hours, ICI must call the BST LCSC to get  
10 a status on the order. Again, sometimes the faxes do  
11 not make it through, so ICI then would have to resend  
12 the order further delaying the provisioning of the  
13 service. Again, only when ICI receives the FOC can we  
14 call the customer and confirm the due date, voice mail  
15 access number, and password.

16 **LENS DOES NOT YET BRING PARITY**

17 Q. Does LENS cure this inequality?

18 A. No. To reiterate briefly, BST introduced an  
19 Operational Support System (OSS) called Local Exchange  
20 Navigation (LENS) in the middle of May 1997. This  
21 limited system is a web-based system that allows CLECs  
22 to access pre-ordering information via an inquiry mode  
23 and to place four types of firm orders.

24 The first type of resale order that one can place  
25 using LENS is a switch "As-Is" order. The second is  
26 a switch-as-specified, or switch-with-changes, which

1 means that one converts the customer to ICI and change  
2 features and service at the same time. This is of  
3 limited use to ICI, as we do not change services on  
4 the initial conversion. The only reason ICI would  
5 "switch-with-change" would be to switch the customer  
6 and change the long distance PIC code to ICI. But,  
7 LENS does not allow us to do that simply by filling  
8 out field that indicates the long distance PIC. In  
9 order to do the switch-with-changes where the only  
10 change is the long distance PIC, we must is to  
11 recreate each telephone number with all feature codes  
12 that it currently has and then designate a long  
13 distance PIC. This is unnecessarily cumbersome.

14 The third type of order that can be placed using  
15 LENS is a total disconnect of an account. We have not  
16 had any request to date to disconnect entire accounts.  
17 Frequently, we do have requests to disconnect certain  
18 numbers on accounts, but LENS does not currently allow  
19 this.

20 The fourth type of order LENS allows is to  
21 establish new service at an address where there is  
22 currently no working service. ICI has had very few  
23 requests for these types of orders, since we do mostly  
24 switch "As-Is" orders when first obtaining the  
25 customer.

26 Q. Are there other limitations to LENS?



1 A. Yes. LENS does not automatically send the FOC and due  
2 date. The CLEC user must periodically check for FOCs.  
3 ~~The CSRs are not provided automatically by LENS~~  
4 ~~either. However, in mid June 1997 BST made view and~~  
5 ~~printing of the CSR available, and is available in~~  
6 ~~seven of the nine BST states. View and printing is~~  
7 ~~not available in Georgia and Louisiana, but PSC~~  
8 ~~approval is pending.~~

9 Q. Please summarize your view of LENS.

10 A. LENS is better than the paper LSR for switch "As-Is"  
11 and switch-with-changes because a BST representative  
12 does not have to issue the orders. However, it is  
13 limited for MAC orders. Change orders, (e.g. PIC  
14 changes) and Add orders (e.g. adding features and  
15 lines) are currently not available using the LENS  
16 system. BST estimates that it will be functional for  
17 these tasks sometime in 1997, but could not provide a  
18 firm date.

19 **CONCLUSION**

20 Q. In your opinion, have these problems adversely  
21 affected Intermedia's ability to compete in the local  
22 market?

23 A. Yes, these problems have adversely affected  
24 Intermedia's ability to compete in the local market.  
25 The problems with the orders that I have described  
26 create customer frustration, give customers a negative

1 perception of ICI, add to ICI's administrative costs,  
2 cause delays in billing, and cause delays in  
3 provisioning the service.

4 Q. In your opinion, does ICI enjoy parity with BST with  
5 respect to the conversion process?

6 A. No. It takes both more time and labor to convert a  
7 BST customer to ICI than it does to convert an ICI  
8 customer to BST. To reiterate, if a BST customer  
9 wants to convert his or her service to ICI, about a  
10 third of the time it takes two to four weeks to  
11 achieve the conversion. Based on my experience in the  
12 field, it takes one business day for BST to switch  
13 back one of our customers to its service. In all  
14 cases that I am aware of, if the customer becomes  
15 dissatisfied with our service due to delays introduced  
16 by BST, he or she simply can call BST and have the  
17 service switched almost instantly. This is not  
18 parity.

19 Q. Does this complete your testimony?

20 Y. Yes.

21

22

1 Q: Please state your name and on whose behalf you are  
2 testifying.

3 A: My name is J. Lans Chase. My address is 135 West  
4 Central Boulevard, Suite 1050, Orlando, Florida 32801.  
5 I am testifying on behalf of Intermedia Communications  
6 Inc. (Intermedia).

7 Q: Did you previously file in this docket direct  
8 testimony concerning Issue 15 (resale)?

9 A: Yes.

10 Q: What is the purpose of your rebuttal testimony?

11 A: The purpose of this testimony is to rebut the  
12 testimony of witness Gloria Calhoun and other  
13 BellSouth witnesses to the extent they argue that  
14 there is parity between BellSouth and ALECs with  
15 respect to pre-ordering and ordering functions in the  
16 resale market. In my direct testimony I provided a  
17 simple description of the problems Intermedia has  
18 encountered in converting BellSouth customers to  
19 Intermedia resale customers. To reiterate, I believe  
20 these the problems establish beyond reasonable debate  
21 that Intermedia does not enjoy parity with BellSouth  
22 in the conversion of a resale customer from one  
23 company to the other. BellSouth seems to suggest,  
24 however, that some systems it has recently introduced  
25 solve these problems, and that parity has been  
26 achieved. I disagree.

1    **Q: Is it your testimony that BellSouth has not made**  
2    **progress in OSS for resale orders?**

3    A: No. BellSouth has made progress. I do not want to  
4    minimize the task before BellSouth in achieving  
5    parity, nor the effort it has put into developing  
6    workable mechanical and electronic interfaces with  
7    ALECs. But we do not yet enjoy parity with BellSouth.  
8    Rather we have options by which we can perform pre-  
9    ordering and ordering functions, and at present we  
10   often must use one system for pre-ordering and another  
11   system for ordering. In the context of OSS, BellSouth  
12   is the vendor and ALECs such as Intermedia are the  
13   customers. As BellSouth progresses, that is, as it  
14   introduces new developments to resolve the limitations  
15   of its current OSS, Intermedia and other ALEC  
16   customers will work to adapt to these new  
17   developments, as well as the offerings of other ILECs.

18

19   **Q: One of the systems BellSouth seems to claim delivers**  
20   **parity is its Local Exchange Navigation System (LENS).**  
21   **Do you agree?**

22   A: No. As I noted in my direct testimony, this system is  
23   still in its infancy and is limited both in its pre-  
24   ordering and ordering functionality. To reiterate,  
25   LENS only allows 4 type of orders: switch "As-Is",  
26   switch-as-specified, total disconnects, or brand new

1 service at an address where there is currently no  
2 working service. Therefore, LENS will not allow  
3 Intermedia to place orders to change the long distance  
4 PIC or to add call waiting. This type of order must  
5 be placed using EDI. LENS is primarily a pre-ordering  
6 interface and this is how Intermedia uses it.

7 **Q: Does Intermedia currently use LENS to perform**  
8 **pre-ordering functions for all of the BellSouth**  
9 **services it would resell?**

10 **A:** No. Intermedia now uses LENS for pre-ordering of  
11 "Move, Add, or Change" (MAC) orders only.  
12 Unfortunately, LENS is limited here as well because it  
13 does not allow Intermedia to reserve more than 6  
14 telephone numbers. This is a major problem when using  
15 LENS to perform pre-ordering functions for MAC orders.

16 **Q:** <sup>Does</sup> ~~Could~~ Intermedia use LENS for pre-order activity with  
17 "As-Is" conversions?

18 **A:** Yes, ~~we could but at this time we do not.~~ The initial  
19 switch "As-Is" orders do not require as much pre-order  
20 activity because this order simply involves switching  
21 the service exactly as it is today. For these  
22 conversions, Intermedia <sup>also sometimes</sup> uses the IC/REF  
23 (Interconnection Reference External Customer  
24 Validation) system to verify the address and the  
25 BellSouth PIC Care (Character User Interface) system  
26 to verify the main account number. That is all of the

1 pre-ordering that is necessary on a switch "As-Is"  
2 order, <sup>So</sup> ~~and~~ there is no <sup>clear</sup> advantage at this time to use  
3 LENS for this purpose.

4 **Q: Let's address the use of LENS for placing resale**  
5 **orders with BellSouth. Does Intermedia currently use**  
6 **LENS to perform the ordering functions for all of the**  
7 **BellSouth services it would resell?**

8 **A:** No. As discussed in my direct testimony, Intermedia  
9 cannot use LENS to perform MAC orders. LENS does not  
10 currently have that capability. It is my  
11 understanding that Intermedia could use LENS to do a  
12 switch "As-Is" order for most of the non-complex  
13 services, but again there are limitations. For  
14 example, Intermedia could not use LENS to order call  
15 waiting on a line because LENS does not have that  
16 capability, but instead Intermedia would have to use  
17 EDI to place that order.

18 **Q: Let's turn our attention to EDI. Does Intermedia**  
19 **currently use EDI to perform pre-ordering functions**  
20 **for all of the BellSouth services it would resell?**

21 **A:** No. EDI is not capable of providing pre-ordering  
22 functions. The Ordering and Billing Forum (OBF) is  
23 currently looking into developing pre-ordering  
24 standards and is considering EDI as one of the  
25 choices. Currently, however, for any order placed  
26 through EDI, Intermedia must use the LENS, IC REF, or

1 PIC Care system to do the pre-order function. For  
2 example, if the customer wants to add call waiting and  
3 call forwarding variable to an existing line,  
4 Intermedia would have to use LENS to validate the  
5 address and to check feature availability for that  
6 central office, and then in a separate step use that  
7 information to place the order through EDI.

8 **Q: Does Intermedia currently use EDI to perform ordering**  
9 **functions for all BellSouth services it would resell?**

10 A: No. Not all of the service Intermedia resells are  
11 available for ordering using EDI. Intermedia is  
12 currently performing end-to-end testing <sup>of MAC orders</sup> with BellSouth  
13 using the Harbinger EDI software. Intermedia ~~will use~~ <sup>uses</sup>  
14 the EDI to place its switch "As-Is" ~~and MAC~~ orders for  
15 the services that EDI will support. Nevertheless,  
16 complex or designed services must be ordered through  
17 the Interconnection Services Account Team. For  
18 example, Intermedia can place a switch "As-Is" order  
19 using EDI for an account with 5 business lines.  
20 However, if Intermedia wanted to enter a switch "As-  
21 Is" order for a MultiServ account, it would have to be  
22 submitted on the standard paper LSR to the  
23 Interconnection Services Account Team.

24 **Q: Returning to LENS for a moment, on page 10, lines**  
25 **13-19, Ms. Calhoun testifies in part that "(f)rom the**  
26 **customer's perspective, pre-ordering interactions with**

1           an ALEC using LENS are indistinguishable from  
2           pre-ordering interactions with BellSouth . . . ." Is  
3           it your experience that customers cannot distinguish  
4           the pre-ordering functions from Intermedia's use of  
5           LENS with BellSouth?

6       A:   No.  If all we were talking about were switch "As-Is"  
7           of the very simplest residential and business  
8           services, such as single line residential with no  
9           features, then perhaps a customer could not  
10          distinguish pre-ordering interactions with us from  
11          those of BellSouth.  We simply have no experience to  
12          either challenge or validate that claim.  Where we do  
13          have real world experience with LENS, however, we know  
14          that this conclusion is wrong.  For example, as already  
15          noted Intermedia uses LENS primarily for MAC pre-order  
16          activity.  Intermedia cannot easily take the pre-order  
17          information from LENS and process the actual order.  
18          Rather, an Intermedia employee must take the print-out  
19          of the address, features, and numbers and either  
20          complete the paper LSR or enter the information into  
21          the EDI software.  This cannot be done with a customer  
22          waiting on the telephone.  In sum, with LENS (as with  
23          EDI), we still have to perform too much manual  
24          intervention and re-keying of information to process  
25          an order.

26       Q:   But doesn't Ms. Calhoun state (page 11, lines 5-14),



1           that there are means for an ALEC to receive the pre-  
2           order data in a format that would enable it to put the  
3           information into its own OSS to avoid manual  
4           intervention and re-keying?

5       A:    Yes.  This is so new, however, that it has not yet  
6           been tested by Intermedia.  Just as BellSouth as the  
7           vendor has had time to develop its systems, ALECs as  
8           the customers must have a reasonable amount of time to  
9           develop their interfacing systems.

10      Q:    In your direct testimony and in this rebuttal  
11           testimony you make the point that currently pre-  
12           ordering and ordering activities are cumbersome for  
13           the majority of the services Intermedia would resell.  
14           Ms. Calhoun seems to suggest that BellSouth labors  
15           under the same limitations in terms of its own  
16           internal systems.  Do you agree?

17      A:    No.  On page 30 of Ms. Calhoun's direct testimony she  
18           states that under the Direct Order Entry Application  
19           Program (DSAP) due dates cannot be obtained separately  
20           in pre-ordering and ordering functions, but rather  
21           "DSAP must know which services are being ordered, and  
22           must look at the entire order as a package." (lines  
23           21-22)  She then goes on to testify as follows:

24                   . . . although DSAP does not  
25                   calculate a due date for a LENS  
26                   due date inquiry that is not

1 associated with an order, this is  
2 not discriminatory. Due dates  
3 are not calculated independently  
4 of the ordering function for  
5 BellSouth's retail customer's  
6 either. (lines 22-25)

7 The problem with this statement is that a BellSouth  
8 employee enters the order in totality and is able to  
9 obtain a due date from the DSAP system. Since LENS  
10 does not process firm orders for MAC, the ALEC must  
11 wait for a FOC that contains the due date after the  
12 order is sent via EDI or paper fax.

13 **Q: Attached to Mr. Stacy's testimony is EXH F, which is**  
14 **labeled "Resale Parity Report." Please provide your**  
15 **comments regarding the significance of this exhibit.**

16 **A:** This chart is misleading because it measures  
17 BellSouth's performance to provision service once the  
18 order is completed in the BellSouth order systems.  
19 The chart does not reflect the problems in entering  
20 the ALEC's orders into BellSouth's order systems.  
21 With resale, the fundamental disparity is in the pre-  
22 ordering and ordering activities. We must ensure that  
23 the ALEC enjoys parity with BellSouth in these  
24 critical pre-ordering and ordering functions.

25 **Q: Do you believe that LENS and EDI have been**  
26 **sufficiently tested in the market to understand fully**

1           **their strengths and limitations?**

2    A:    No.  Although, Ms. Calhoun states that BellSouth has  
3           tested its LENS and EDI systems, I believe that there  
4           needs to be more extensive testing and performance  
5           standards developed regarding access to BellSouth's  
6           OSS systems for local resale.  Intermedia is  
7           encouraged that LENS and the Harbinger EDI software is  
8           available; nevertheless we see these as just the  
9           beginning of necessary access to OSS systems for  
10          resale of BellSouth's local exchange services.

11   **Q:    Given that Intermedia is encouraged by the**  
12          **introduction of LENS and EDI, why does Intermedia**  
13          **continue to use the older, manual processes when these**  
14          **better options are available?**

15    A:    We continue to use these older manual processes out of  
16          necessity.  It is in Intermedia's interest to fully  
17          use BellSouth's OSS as soon as practical, and  
18          Intermedia is working on this.  But just as BellSouth  
19          had to make the transition from manual systems to  
20          electronic ones, so must Intermedia.

21   **Q:    Is Intermedia devoting resources to this task?**

22    A:    Yes.  Intermedia is currently developing its OSS  
23          systems for not only BellSouth, but for the other  
24          ILECs with which it will do business.  And with  
25          respect to BellSouth's systems, they have only been  
26          introduced recently.  My understanding is that both

1 EDI and LENS were just introduced at the April  
2 BellSouth/OLEC Conference. Moreover, Intermedia did  
3 not gain access to LENS until mid-May at the first  
4 LENS training session in Birmingham, Alabama. In any  
5 event, as should be evident from this testimony  
6 Intermedia is making the transition from using the  
7 Printed LSRs to EDI and Intermedia is already using  
8 LENS for pre-ordering, and EDI for replacing switch <sup>as-</sup>  
is orders.

9 Q: In conclusion, do you believe that BellSouth has  
10 on-line full OSS for resale that is comparable to what  
11 it enjoys internally?

12 A: No. Until the systems can be tested in full  
13 production for a sufficient time period ~~and until LENS~~  
14 ~~can be used for MAC orders~~, I do not believe that  
15 BellSouth has provided non-discriminatory OSS for  
16 resale services.

17 Q: Does this conclude your testimony?

18 A: Yes.

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1           Q     (By Mr. Wiggins) Mr. Chase, do you have a  
2 summary to give the Commission of your testimony?

3           A     Yes, I do.

4           Q     Would you please give it?

5           A     Good afternoon. After listening to the  
6 testimony of other witnesses for several days, I realize  
7 that my testimony here is limited. I am not here to  
8 interpret the Telecommunications Act, the Ameritech  
9 order, the 8th Circuit decision, or even talk about  
10 Intermedia's efforts to obtain unbundled network  
11 elements.

12                     Instead, I am here to provide you information  
13 about the experiences Intermedia has had in actually  
14 trying to use BellSouth's OSS to accomplish the  
15 preordering and ordering functions necessary to resell  
16 BellSouth services. In other words, I am testifying  
17 about Intermedia's real world experience in attempting  
18 to make BellSouth customers Intermedia resale  
19 customers.

20                     Based on Intermedia's experiences in  
21 attempting to accomplish the preordering and ordering  
22 functions for the simplest voice resale services, I  
23 believe that BellSouth does not yet provide  
24 non-discriminatory OSS for resold services.

25                     Perhaps the best way to show the disparity

1 between the OSS BellSouth gives itself and the OSS it  
2 provides to Intermedia is to compare how long it takes  
3 an Intermedia customer, resale customer, to switch back  
4 to BellSouth with how long it takes to convert a  
5 BellSouth customer to an Intermedia customer.

6           If an ICI resale customer wants to convert  
7 back to BellSouth for any reason, he or she can do that  
8 in one day. The customer simply calls BellSouth and has  
9 that service switched almost instantly, with or without  
10 changes to the service itself.

11           On the other hand, if a BellSouth customer  
12 wants to convert his or her service to ICI, it takes two  
13 working days, if things work perfectly.

14           Unfortunately, it has been our experience that  
15 things rarely work perfectly and delays in conversion  
16 are routine. Indeed, about one third of the time it  
17 takes between two and four weeks to achieve the  
18 conversion of basic resale services. This is not  
19 parity.

20           BellSouth has made progress. I do not want to  
21 minimize the task before BellSouth in achieving parity,  
22 nor the effort it has to put into developing workable  
23 mechanical and electronic interfaces with ALECs.  
24 Likewise, Intermedia is working hard to take full  
25 advantage of those developing interfaces.

1           We look forward to the day that it is just as  
2 easy to convert a BellSouth customer to Intermedia as it  
3 is for an Intermedia customer to switch back to  
4 BellSouth. Nevertheless, the day has not yet arrived,  
5 and to say that it has is to ignore reality.

6           Q     Does that conclude your summary?

7           A     Yes.

8           MR. WIGGINS: Mr. Chase is available for  
9 cross-examination.

10          MS. BARONE: Madam Chairman, Staff would like  
11 to have its exhibit marked for identification at this  
12 time.

13                 It's identified as JLC-4 and consists of  
14 Mr. Chase's deposition transcript and his Late-filed  
15 Deposition Exhibits 1 through 4. Staff requests that  
16 this exhibit be marked as composite Exhibit 106.

17          CHAIRMAN JOHNSON: It will be so marked.

18          MS. BARONE: Thank you.

19                 (Exhibit No. 106 marked for identification.)

20          CHAIRMAN JOHNSON: Any questions from any  
21 other parties?

22          MR. HATCH: No, ma'am.

23          CHAIRMAN JOHNSON: BellSouth?

24          MR. MARKS: Thank you.

25

## 1 CROSS EXAMINATION

2 BY MR. MARKS:

3 Q Good afternoon, Mr. Chase. I'm John Marks,  
4 and I'll be asking you some questions on behalf of  
5 BellSouth this afternoon.

6 First of all, Mr. Chase, let me make sure I  
7 understand the nature of your revisions to your prefiled  
8 testimony and your rebuttal -- direct testimony and your  
9 rebuttal testimony.

10 A Okay.

11 Q Am I understanding correctly, the basic nature  
12 of those changes were to update the current order  
13 processing system that ICI currently has with regards to  
14 resale items?

15 A That's correct.

16 Q And that was an update from your direct  
17 testimony?

18 A Yes, direct and rebuttal.

19 Q And rebuttal.

20 Now, am I understanding correctly in your  
21 deposition, which has been marked as an exhibit, that  
22 most of those changes were contained in that deposition  
23 exhibit?

24 A Excuse me, can you repeat the question?

25 Q In your deposition, were most of those changes



1 contained in that deposition?

2 A I don't know if I specifically changed the  
3 testimony, but the deposition was held after we made our  
4 changes in our ordering processes.

5 Q All right. Let's leave it at that then. Let  
6 me ask you this question. As I understand it, you are  
7 here to address Issues 15 and 15(a) alone; is that  
8 correct?

9 A Yes.

10 Q And those deal with the resale of BellSouth's  
11 services; is that right?

12 A Yes.

13 Q In your -- in ICI's response to that issue, it  
14 states in part: "Theoretically, BellSouth has made its  
15 retail services available to ICI for resale purposes."  
16 Do you recall that?

17 A Yes.

18 Q Now, as I -- if I am to understand correctly,  
19 ICI currently is in fact purchasing and reselling  
20 BellSouth's retail services.

21 A That's correct.

22 Q That's not -- those are not theoretical  
23 purchases or sales; are they?

24 A No.

25 Q So you're actually doing that at this point in

1 time?

2 A Yes.

3 Q Okay. Now, is ICI actually reselling these  
4 services to their customers today?

5 A Yes, we are.

6 Q And how long has ICI been reselling BST's  
7 resale services?

8 A I think around the time frame of October  
9 1996.

10 Q Okay. For almost a year now?

11 A Yes.

12 Q What percentage of ICI's business in Florida  
13 is being offered through resale of BellSouth's retail  
14 services?

15 A I do not know.

16 Q Am I to understand correctly as well that ICI  
17 also provides facilities and provides services through  
18 those facilities as well?

19 A Yes, I believe we do.

20 Q Do you know the percentage of -- percentage of  
21 your business is off of your facilities, as opposed to  
22 being over resale facilities?

23 A No, I do not.

24 Q Does ICI provide service in Tampa, Miami,  
25 Jacksonville and Orlando currently?

1 A Yes, I believe we do.

2 Q Are there any other locations in Florida where  
3 you're providing service?

4 A Not that I am aware of.

5 Q How long has ICI been a competitive -- or  
6 providing competitive local exchange service in  
7 Florida?

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

9 Q Would it be more than five years?

10 A I have no idea.

11 Q How long has ICI been in business in the State  
12 of Florida?

13 A I believe it's around ten years.

14 Q Around ten years? And you're not aware of  
15 whether or not they've been providing competitive  
16 services for that length of time?

17 A I'm not aware of the exact date, no.

18 Q In your testimony you allude to -- on several  
19 occasions, to preordering, ordering functions related to  
20 BellSouth's retail services for resale.

21 I would like to ask you a few questions  
22 regarding that. And I think you've covered some of this  
23 in your summary, but I would like to just ask you some  
24 additional questions.

25 On August 5th ICI began using LENS and EDI, as

1 I understand it, for preordering and ordering retail  
2 services from BellSouth; is that correct?

3 A Yes. We began using EDI on August 5th. I  
4 believe we were using -- for ordering. I believe we  
5 were using LENS before that date for preordering.

6 Q When did you begin using LENS?

7 A That would have been June 1997.

8 Q All right. And you are currently using both  
9 the LENS and EDI for preordering and ordering  
10 BellSouth's retail services?

11 A Yes.

12 Q Does ICI continue to use a manual or paper  
13 format for preordering and ordering Bell's retail  
14 services?

15 A Yes. ICI uses manual process for move, add  
16 and change orders at this time. No, we do not use any  
17 manual for preordering. So I don't --

18 Q Is it safe to say you're attempting to migrate  
19 completely to the LENS and EDI system of processing?

20 A Yes, we are currently in the testing mode of  
21 EDI for moves, adds and change orders.

22 Q Has using LENS and EDI improved ICI's order  
23 processing?

24 A I hope so, but I think at this time I  
25 really -- since we've only been using it about a month,

1 that I'm not able to know exactly yet.

2 Q Am I to understand correctly, as well, that  
3 ICI uses the EDI PC version of Harbinger software, and  
4 that is what you're using today?

5 A Yes, that's what we're using today.

6 Q In portions of your testimony you discuss  
7 front end interfaces for data transfer, and you indicate  
8 that ICI is attempting to develop this front end  
9 interface for transfer of data using the Harbinger  
10 software to interconnect with ICI's database. Have you  
11 all done that yet?

12 A No, I think that's still a work in progress.

13 Q All right. Do you have any idea when you plan  
14 to complete that process?

15 A No, I do not. As soon as possible, but I am  
16 not involved in the day-to-day of the developing all of  
17 those front end processes.

18 Q When that is completed, would you believe  
19 that -- would you state that that would probably  
20 further simplify the ordering process for ICI?

21 A Yes, to the extent those systems are fully  
22 implemented and tested.

23 Q Well, once they're fully implemented and once  
24 they're fully tested, if in fact that interface is  
25 implemented, that would indeed improve the ordering

1 process for ICI; is that correct?

2 A I would assume it would, yes.

3 (Transcript continues in sequence in

4 Volume 28.)

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