

**ORIGINAL**

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 000649-TP**

**PREFILED REBUTTAL TESTIMONY  
OF SHERRY LICHTENBERG  
ON BEHALF OF WORLDCOM, INC.**

**September 7, 2000**

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING 06192

1 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.

2 A. My name is Sherry Lichtenberg. My business address is 701 S. 12<sup>th</sup> St.,  
3 Arlington, Virginia 22202. I am employed by WorldCom, Inc. in the Mass  
4 Markets Product Development Department as a senior manager. In my  
5 testimony, I will use the term "WorldCom" to refer to both MCImetro Access  
6 Transmission Services, LLC and MCI WORLDCOM Communications, Inc.

7 Q. HAVE YOU PREVIOUSLY FILED DIRECT TESTIMONY IN THIS  
8 DOCKET?

9 A. Yes.

10 Q. HAVE ANY ISSUES THAT YOU DISCUSSED IN YOUR DIRECT  
11 TESTIMONY SUBSEQUENTLY BEEN RESOLVED?

12 A. Yes. Issues 78, 83, 84, 88 and 89 have now been resolved.

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

14 A. The purpose of my rebuttal testimony is to respond to arguments made by  
15 BellSouth witness Pate concerning issues 80, 81, 90-91 and 96A.

16 **ISSUE 80**

17 *Should BellSouth be required to provide an application-to-application*  
18 *access service order inquiry process? (Attachment 8, Sections 2.1.1.2*  
19 *and 2.2.3.)*

20  
21 Q. AT PAGE 12 OF HIS TESTIMONY, MR. PATE CONTENDS THAT  
22 ACCESS SERVICES ARE NOT PART OF BELL SOUTH'S  
23 OBLIGATIONS UNDER THE ACT AND THAT WORLDCOM SHOULD  
24 NOT BE PERMITTED TO USE THIS ARBITRATION TO TRY TO



1           *Should BellSouth provide a service inquiry process for local services as*  
2           *a pre-ordering function? (Attachment 8, Section 2.2.1.)*  
3

4   **Q.    DOES BELLSOUTH PROVIDE A SATISFACTORY SERVICE**  
5           **INQUIRY PROCESS?**

6   A.    No. Mr. Pate describes a service inquiry process that an ALEC can use “[i]f the  
7           ALEC desires to have BellSouth immediately order the service once the [service  
8           inquiry] is complete and compatible facilities are [available].” (Pate, pp. 14-15.)  
9           Mr. Pate does not discuss what the ALEC can do if it wishes to submit a service  
10          inquiry but does not necessarily wish to order the service. My understanding is  
11          that BellSouth does not offer this capability on a pre-order basis.

12                 It is often the case that WorldCom needs facilities information as a part  
13                 of its efforts to close a sale – that is, before WorldCom is in a position to submit  
14                 an LSR. Even assuming that WorldCom could obtain all the information  
15                 necessary to populate an LSR before making the sale, BellSouth’s proposed  
16                 method would require WorldCom to submit an order with the service inquiry  
17                 and then cancel the order if it was not able to make the sale. That approach is  
18                 wasteful and gives rise to the risk that BellSouth’s systems would not cancel  
19                 orders in a timely manner.

20   **Q.    MR. PATE CONTENDS THAT THE SERVICE ORDER INQUIRY**  
21           **PROCESS IS ACCOMPLISHED IN SUBSTANTIALLY THE SAME**  
22           **TIME AND MANNER AS THAT OF BELLSOUTH’S RETAIL**  
23           **ORGANIZATION. HOW DO YOU RESPOND?**

1 A. BellSouth has records providing facilities information. I understand based on  
2 Mr. Pate's testimony in the North Carolina arbitration case that BellSouth's  
3 account teams have some access to this information on a pre-order basis. In any  
4 event, BellSouth has access to this information and should not be allowed to  
5 restrict its availability based on how it chooses to distribute that information  
6 within its own organization.

7 **ISSUE 90**

8 *Should BellSouth be required to provide completion notices for manual*  
9 *orders?*

10  
11 **Q. DOES THE CSOTS PROPOSAL DESCRIBED BY MR. PATE FOR**  
12 **NOTIFICATION OF COMPLETION OF MANUAL ORDERS PROVIDE**  
13 **A SATISFACTORY ALTERNATIVE TO ACTUAL COMPLETION**  
14 **NOTICES?**

15 A. No. As I discussed in my Direct Testimony, using CSOTS would be costly and  
16 inefficient for WorldCom. In addition, my understanding is that BellSouth  
17 provides itself completion notification information electronically so that its  
18 records used for functions such as billing and maintenance and repair are  
19 updated automatically. BellSouth thus provides itself substantially better  
20 completion notification than it proposes to offer to WorldCom.

21 **ISSUE 91**

22 *What intervals should apply to FOCs? Should BellSouth be required to*  
23 *check facilities before returning an FOC? (Attachment 8, Section*  
24 *3.4.1.2.)*  
25

1 Q. MR. PATE STATES THAT BELLSOUTH CHECKS FACILITIES  
2 BEFORE ISSUING A FIRM ORDER CONFIRMATION ONLY FOR  
3 CERTAIN SERVICES. IS THIS PRACTICE REASONABLE?

4 A. No. If BellSouth does not check facilities before issuing the FOC, ALECs  
5 cannot have any degree of confidence in the installation date provided on the  
6 FOC. When BellSouth discovers a facilities problem once it checks facilities,  
7 often the installation date must be rescheduled, causing the customer, its  
8 equipment vendor and WorldCom to reschedule the cutover. It is far preferable  
9 that BellSouth check for facilities problems before issuing the FOC so all parties  
10 can rely on that date as firm. Scheduling delays are particularly damaging to an  
11 ALEC attempting to win customers and make a name for itself in the local  
12 market. BellSouth should be required to check facilities in advance to afford  
13 ALECs a meaningful opportunity to compete.

14 Q. MR. PATE STATES THAT BELLSOUTH'S FOC TIMES WOULD BE  
15 INCREASED SIGNIFICANTLY TO ACCOMMODATE THE  
16 ADDITIONAL PROCESS TIME ASSOCIATED WITH VERIFICATION.  
17 HOW DO YOU RESPOND?

18 A. WorldCom would be willing to accept BellSouth's intervals if they were based  
19 on facilities checks. In any event, WorldCom's strong preference is for an FOC  
20 with an installation date that WorldCom can rely on, even if that FOC takes  
21 longer to provide.

22  
23

1 **ISSUE 96A**

2 *Should BellSouth be required to provide customer service record (CSR)*  
3 *information in a format that permits its use in completing an order for*  
4 *service?(Attachment 8, Section 2.1.2.1)*  
5

6 **Q. DOES MR. PATE EXPLAIN ADEQUATELY WHY BELLSOUTH IS**  
7 **UNWILLING TO AGREE TO WORLDCOM'S POSITION ON THIS**  
8 **ISSUE?**

9 A. No. WorldCom's position in a nutshell is that BellSouth should provide a CSR  
10 that is parsed at the field level and can be used to pre-populate an LSR directly.  
11 Mr. Pate contends that BellSouth's systems already permit sufficient parsing  
12 without providing details necessary to corroborate his claim. Mr. Pate describes  
13 the status of the parsing issue in the change control process, but fails to explain  
14 why it would not be appropriate to rely on that process in the Interconnection  
15 Agreements in the absence of national standards.

16 WorldCom has requested parsing at the field level -- which separates the  
17 different pieces of information in each line (such as house number, street, and  
18 community name) -- in contrast to parsing at the line level as suggested by  
19 BellSouth. The field lengths and valid values in the pre-order system must  
20 match those required in the LSR in order to permit WorldCom to automatically  
21 populate the LSR in real time. This need is made all the more critical in light of  
22 BellSouth's requirement that the complete service address must be included in  
23 all orders for UNE-P migration. WorldCom recommends that BellSouth follow  
24 the excellent standard established by Verizon and the ALECs who worked  
25 collaboratively to develop a true parsed CSR in the Verizon region.

1 Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

2 A. Yes.

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