

ORIGINAL

Mpower Communications Corp.



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February 28, 2001

Mrs. Blanco S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP (Performance Measurements)

Dear Mrs. Bayo:

Enclosed for filing are an original and fifteen copies of the Direct Testimony of Michael Iacino on behalf of Mpower Communications Corp. in the above-referenced docket.

A copy of this letter is also enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties of record in this matter. Thank you.

Very Truly Yours,

John Kerkorian
Regional Vice President
Legal and Regulatory Affairs

Enclosures

- APP _____
- CAF _____
- CMP _____
- COM 5708
- CTR _____
- ECR _____
- LEG I
- OPC _____
- PAI _____
- RGO _____
- SEC I
- SER _____
- OTH _____

cc: Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
02775 MAR-16
FPSC-RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the Establishment of
Operations Support Systems Permanent
Performance Measures for Incumbent Local
Exchange Telecommunications Companies

Docket No.: 000121-TP
Filed: March 1, 2001

**TESTIMONY OF
MICHAEL IACINO
ON
BEHALF OF
MPOWER COMMUNICATIONS CORP.**

DOCUMENT NUMBER-DATE

02775 MAR-16

FPSC-RECORDS/REPORTING

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY OF MICHAEL IACINO**

3 **ON BEHALF OF MPOWER COMMUNICATIONS CORP.**

4 **DOCKET NO. 000121-TP**

5 **FEBRUARY 28, 2001**

6
7
8 **Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

9 My name is Michael Iacino. I am the Regional Provisioning Manager – Florida for
10 Mpower Communications Corp. (“Mpower”). My business address is 1815 Griffin Road, Suite
11 401, Dania, Florida, 33004.

12 **Q. PLEASE STATE YOUR TELECOMMUNICATIONS BACKGROUND AND**
13 **EXPERIENCE.**

14 I have been employed as Mpower’s Regional Provisioning Manager - Florida since
15 March 2000. In this role, I am responsible for all facets of Mpower’s provisioning activities –
16 from order entry through “cut to bill” in all of Mpower’s Florida markets (presently South
17 Florida, Tampa, Orlando and Jacksonville). Prior to joining Mpower, I held similar positions
18 with National Tel/Intermedia Communications and PaeTec Communications. I have been
19 employed in the telecommunications industry since 1993.

20 **Q. PLEASE DESCRIBE MPOWER’S GENERAL BUSINESS PLAN.**

21 Mpower is a Competitive Local Exchange Carrier (CLEC) offering voice and high speed
22 data services to small and mid-size businesses in Florida. To provide these services, Mpower
23 orders voice grade loops, xDSL capable loops, and unbundled interoffice transport from
24 BellSouth, Verizon and Sprint.

25 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

1 My testimony is intended to provide this Commission with real world examples of the
2 types of difficulties Mpower experiences with BellSouth's Local Carrier Service Center
3 ('LCSC'), and the impact those difficulties have on Mpower's provisioning efforts.

4 **Q. PLEASE EXPLAIN GENERALLY THE PROVISIONING PROCESS AS IT**
5 **RELATES TO BELLSOUTH'S LCSC.**

6 Once a Mpower sales representative convinces a BellSouth customer to switch service to
7 Mpower, and completes the initial order form, the process of transferring service becomes my
8 responsibility. The provisioning process is depicted graphically in Exhibit MI-1, and is as
9 follows:

- 10 • My team receives an order from the sales team and reviews it internally for
11 accuracy.
- 12 • The order is sent to BellSouth LCSC for processing.
- 13 • The LCSC clerical department will sort & scan the order for accuracy (all pages
14 accounted for and fields populated).
- 15 • If the LCSC determines that the order is not accurate it will be rejected back to
16 Mpower.
- 17 • Once the LCSC accepts order, it is assigned the LON (LEC Order Number).
- 18 • If Local Number Portability (LNP) is requested by Mpower, the LCSC logs it into
19 the LNP Gateway, and the order flows to the LCSC the LCSC Supervisor for
20 distribution. If no LNP is requested, the order goes directly to the Supervisor for
21 order distribution.
- 22 • The order team at BellSouth then begins to process the order. If this team makes
23 the determination that the order is inaccurate or incomplete, it is sent back to
24 Mpower for clarification. If this team accepts the order, it sends Mpower a Firm
25 Order Confirmation (FOC).

- 1 ● Once LCSC FOC's the order, it goes to AFIG for engineering of the loop and/or
2 validation that facilities are available to process the order.
- 3 ● If AFIG determines facilities are unavailable, it place the order in Pending
4 Facilities (PF) status, which places the order on hold while BellSouth searches for
5 available facilities to fill the order. Alternatively, AFIG can send the order back
6 to the LCSC if it determines there are errors or inaccuracies. If AFIG confirms
7 that facilities exist and that everything is acceptable, it sends the order to
8 WIN/UNE Center for cut over from BellSouth to Mpower.
- 9 ● Once received from AFIG, BellSouth will call Mpower 24 hours prior to FOC
10 date for concurrence, as we generally pay an extra fee to BellSouth to obtain this
11 order coordination. Once concurrence is given, BellSouth will call back the next
12 day to turn up the line.

13 **Q. HAS MPOWER EXPERIENCED ANY DIFFICULTIES WITH THIS PROCESS?**

14 Yes. The biggest and most frustrating problem is that BellSouth's business rules – the
15 guidelines the LCSC follows to process Mpower's orders – are ambiguous and not fully
16 understood by BellSouth. This injects a great deal of subjectivity and inconsistency into the
17 provisioning process. As a result, Mpower is required to contact the LCSC by telephone to
18 clarify these ambiguities/inconsistencies. Generally, Mpower experiences excessively long hold
19 times when calling into the LCSC. Oftentimes, Mpower is required to telephone the LCSC with
20 questions about clarification from the LCSC that are invalid, confusing or incomplete, or that are
21 inconsistent with the information posted on BellSouth's various CLEC websites. Unfortunately,
22 these holds times have ranged from 20 to over 90 minutes when calling the toll free number
23 (800-872-3116).

24 Also, Mpower has been receiving invalid clarifications as BellSouth representatives are
25 clarifying Mpower orders in error or not providing enough information on the clarification for

1 Mpower to understand and correct the error. This causes longer provisioning intervals and inturn
2 causes a delay in switching the customer from BellSouth to Mpower.

3 Another instance causing a delay in processing our orders involves incomplete or wrong
4 FOC information, system outages, and inaccurate information, such as duplicate circuit ID's or
5 missing circuit ID's, no all telephone numbers listed on the FOC, wrong due date intervals, etc.

6 Finally, Mpower has found material inaccuracies on BellSouth's CLEC websites. The
7 websites are supposed to give Mpower the ability to track the status of an order on line.

8 However, BellSouth regularly fails to update these websites, or posts inaccurate information. All
9 of these inaccuracies and errors intensify Mpower's need to contact the LCSC by phone in order
10 to process orders for our customers in a timely fashion.

11 **Q. HAVE THESE DIFFICULTIES ADVERSELY IMPACTED MPOWER'S**
12 **PROVISIONING EFFORTS IN FLORIDA?**

13 Yes. When Mpower makes a commitment to our customers and the above LCSC internal
14 process flaws cause these delays, we can lose the customer because they become frustrated on
15 the timeframe or with the process. They are not interested in hearing what the problem is, only
16 that it's Mpower who is causing their delay in service. Some of these delays along with a
17 multitude of others can cause delays of days or longer in the provisioning/switching of their
18 service, causing a lack of confidence in the proposed performance of Mpower to meet their
19 needs. The bottom line is that the only vendor available to us -- BellSouth -- is unable to deliver
20 consistent performance. Thus through no fault of our own, our customer's experience is
21 adversely impacted, thereby diminishing Mpower's business reputation and its ability to compete
22 successfully with BellSouth.

23 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

24 Yes.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies; TESTIMONY OF MICHAEL IACINO ON BEHALF OF MPOWER COMMUNICATIONS CORP has been furnished by or U.S. mail on this 1st day of March 2001, to:

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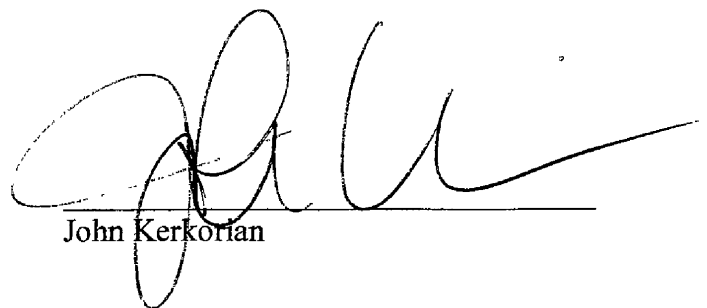
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