

SUZANNE FANNON SUMMERLIN
ATTORNEY AT LAW

1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301

TELEPHONE (850) 656-2288
TELECOPIER (850) 656-5589

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April 11, 2001

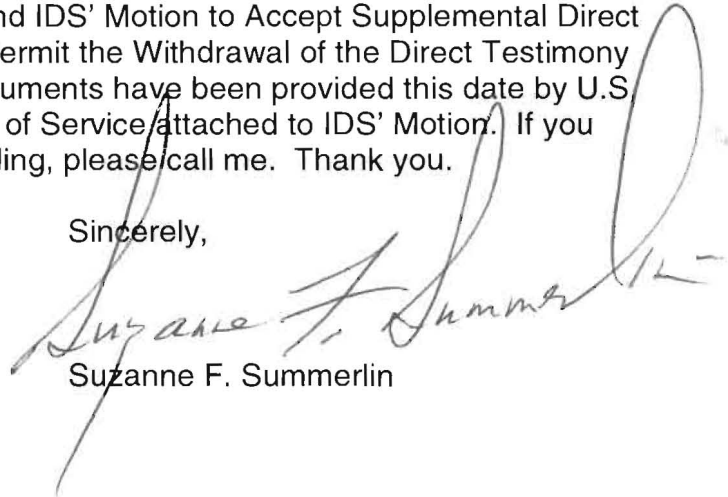
Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, Florida 32399-0850

RE: Docket No. 000121-TP – Investigation into the Establishment of
Operations Support Systems Permanent Performance Measures for
Incumbent Local Exchange Telecommunications Companies.

Dear Ms. Bayo:

Enclosed for filing on behalf of IDS Telcom L.L.C., in Docket No. 000121-TP, are the original and fifteen copies of IDS Telcom L.L.C.'s Supplemental Direct Testimony of Keith Kramer and IDS' Motion to Accept Supplemental Direct Testimony of Keith Kramer and to Permit the Withdrawal of the Direct Testimony of William Gulas. Both of these documents have been provided this date by U.S. Mail to the parties on the Certificate of Service attached to IDS' Motion. If you have any questions regarding this filing, please call me. Thank you.

Sincerely,



Suzanne F. Summerlin

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Enclosures (32)

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FPSC-RECORDS/REPORTING

Testimony
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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: April 11, 2001

**IDS TELCOM L.L.C.'S MOTION TO ACCEPT SUPPLEMENTAL
DIRECT TESTIMONY OF KEITH KRAMER AND TO PERMIT
THE WITHDRAWAL OF THE DIRECT TESTIMONY OF WILLIAM GULAS**

IDS Telcom L.L.C. ("IDS"), pursuant to Rule 28-106.205, Florida Administrative Code, files this Motion to Accept Supplemental Direct Testimony of Keith Kramer and to Permit the Withdrawal of the Direct Testimony of William Gulas and, as grounds therefor, states:

1. IDS very recently became aware of the proceedings in this Docket. For this reason, IDS was not prepared to file complete testimony by the March 1, 2001, direct testimony deadline. IDS did file summary testimony on March 1, 2001, in a good faith attempt to comply with the deadline. However, at the time IDS filed the Direct Testimony of Keith Kramer and William Gulas, these witnesses had not had a chance to review the Staff's testimony filed in February 2001. In addition, several instances of problems with BellSouth's OSS systems, that are relevant to the performance metrics issues identified in this proceeding, have occurred since the March 1, 2001, direct testimony filing deadline about which IDS wishes to inform the Commission.

2. IDS has not had the luxury of participating in this Docket, which has most certainly taken a tremendous amount of time and money for legal

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representation for the participants over the approximate two years that it has been ongoing. For example, as of this date, the Florida Public Service Commission reflects that, for any one party participating in this proceeding, it is necessary to mail copies of all documents to **forty-one parties and staff**. IDS has been compelled to focus its limited resources on its business, which is extremely small compared to BellSouth and many of the other participants in this proceeding. IDS has been struggling to deal with numerous OSS issues being raised in its daily operating relationship with BellSouth.

3. IDS has identified several additional serious problems with BellSouth's OSS Systems since March 1, 2001, as set forth fully in the Supplemental Testimony. This information was not available for the March 1, 2001, direct testimony.

4. IDS is a certified ALEC in the State of Florida. IDS is authorized by the Florida Public Service Commission to provide local telecommunications services in the State of Florida. Because this proceeding will be addressing issues regarding service quality measurements, enforcement measures, benchmarks and analogs and an enforcement plan, the Commission's decisions in this Docket will directly and substantially affect IDS' interests.

5. Performance metrics set by the Commission in this proceeding are of utmost importance to IDS' ability to provide service to Florida consumers.

6. Comprehensive and effective performance measures are essential to ensure that ALECs receive nondiscriminatory access to OSS systems.

7. IDS has operated in the long-distance market in Florida for over ten years providing excellent and profitable service. For the past two years, IDS has provided local telecommunications services in Florida.

8. IDS has submitted tens of thousands of orders to BellSouth for its customers over the past two years and has daily experienced a tremendous number of problems with BellSouth's OSS systems. IDS' experience in actually utilizing BellSouth's OSS systems in its provision of local telecommunications service makes its input to this Docket invaluable.

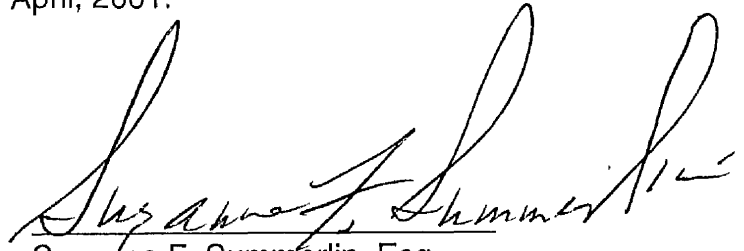
9. No party will be prejudiced by IDS' testimony. BellSouth has full knowledge of all of the OSS issues IDS has experienced because IDS has had ongoing discussions with BellSouth regarding these problems. Other ALECs have experienced their own similar problems. IDS is not providing complicated statistical expert testimony for which discovery would be necessary.

10. IDS respectfully requests that the Commission accept the Supplemental Direct Testimony of Keith Kramer submitted herewith as important additional information relevant to the issues before the Commission in this proceeding.

11. IDS requests that it be permitted to withdraw the Direct Testimony of William Gulas as IDS believes that his testimony will not be necessary in this proceeding.

WHEREFORE, IDS requests that the Commission accept the Supplemental Direct Testimony of Keith Kramer and permit the withdrawal of the Direct Testimony of William Gulas.

Respectfully submitted, this 11th day of April, 2001.

A handwritten signature in black ink, appearing to read "Suzanne F. Summerlin". The signature is written in a cursive style with large, flowing loops.

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
Fla. Bar No.: 398586
(850) 656-2288 (telephone)
(850) 656-5589 (fax)
Attorney for IDS Telecom L.L.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of IDS' Motion to Accept Supplemental Direct Testimony of Keith Kramer and to Permit the Withdrawal of the Direct Testimony of William Gulas has been furnished by hand delivery(*) or U.S. mail on this 11th day of April, 2001, to:

Tim Vaccaro
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2005

Glenn Harris
North Point Communications, Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108

Andrew Isar
Telecommunications Resellers Assoc .
4312 92nd Avenue, N. W.
Gig Harbor, WA 98335

Bruce May
Holland Law Firm
Post Office Drawer 810
Tallahassee, Florida 32302

Mark E. Buechele
Koger Center
Ellis Building
Suite 200
1311 Executive Center Drive
Tallahassee, Florida 32301-5027

Lisa Harvey
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gunter Building, Room 235-D
Tallahassee, Florida 32399-0850

Stephen P. Bowen
Blumfield & Cohen
4 Embarcadero Center, Suite 1170
San Francisco, CA 94111

ALLTEL Communications, Inc.
c/o Ausley Law Firm
Jeffrey Wahlen
P.O. Box 391
Tallahassee, FL 32302

AT&T (GA)
William T. Prescott
1200 Peachtree St., Suite 8100
Atlanta, GA 30309

AT&T
Marsha Rule
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

BellSouth Telecommunications, Inc.
Ms. Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Birch
Rose M. Mulvany/Tad J. Sauder
2020 Baltimore Avenue
Kansas City, MO 64108-1914

Blumenfeld & Cohen
Jeremy Marcus/Elizabeth Braman
1625 Massachusetts Ave., NW
Suite 300
Washington, DC 20036

Covad Communications Company
Catherine F. Boone, Esq.
Regional Counsel
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

Dulaney O'Roark, III
Six concourse Parkway
Suite 3200
Atlanta, GA 30328

e.spire Communications, Inc.
Renee Terry
131 National Business Parkway, #100
Annapolis Junction, MD 20701-1001

Florida Cable Telecommunications Assoc., Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Florida Public Telecommunications Assoc.
Angela Green, General Counsel
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Hopping Law Firm
Richard Melson
P.O. Box 6526
Tallahassee, FL 32314

IDS Telcom LLC
1525 N.W. 167th Street, 2nd Floor
Miami, FL 33169-5143

Intermedia Communications, Inc.
Mr. Scott Sapperstein
One Intermedia Way (MC FLT -HQ3)
Tampa, FL 33647-1752

ITC^Deltacom
Nanette Edwards/Brian Musselwhite
4092 South Memorial Parkway
Huntsville, AL 35802

Katz, Kutter Law Firm
Charles Pellegrini/Patrick Wiggins
12th Floor
106 East College Avenue
Tallahassee, FL 32301

Kelley Law Firm
Jonathan Canis/Michael Hazzard
1200 19th St. NW, Fifth Floor
Washington, DC 20036

KMC Telecom Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043

MCI WorldCom
Ms. Donna C. McNulty
325 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303-4131

McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

MediaOne Florida Telecommunications, Inc.
c/o Laura L. Gallagher, P.A.
101 E. College Ave., Suite 302
Tallahassee, FL 32301

Messer Law Firm
Floyd Self/Norman Horton
P.O. Box 1876
Tallahassee, FL 32302

Mpower Communications Corp.
Mr. John G. Kerkorian
5607 Glenridge Drive, Suite 300
Atlanta, GA 30342-4996

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32302-2095

Rhythms Links Inc.
Kimberly A. Scardino
Suite 300
1625 Massachusetts Ave., N.W.
Washington, DC 20036

Rutledge Law Firm
Kenneth Hoffman/John Ellis
P.O. Box 551
Tallahassee, FL 32302-0551

SBC Telecom, Inc.
Carol Paulsen
5800 Northwest Parkway
Suite 125, 1-Q-01
San Antonio, TX 78249

Sprint Communications Company Limited Partnership
Susan Masterton/Charles Rehwinkel
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214

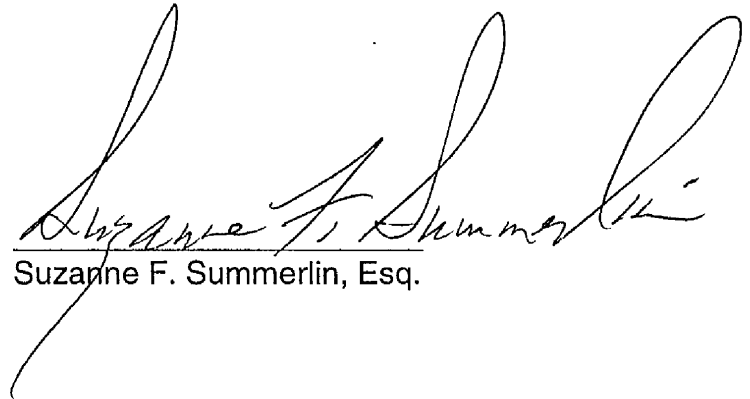
Supra Telecom
Wayne Stavanja/Mark Buechele
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301

Time Warner Telecom of Florida, L.P.
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Verizon Select Services Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

WorldCom, Inc.
Dulaney O'Roark, III
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Z-Tel Communications, Inc.
John Rubino/George S. Ford
601 S. Harbour Island Blvd.
Tampa, FL 33602-5706



Suzanne F. Summerlin, Esq.