

ORIGINAL

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August 27, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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**Re: Docket No. 010740-TP (IDS Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Sandra Harris, Beth Shiroishi, Mary K. Batcher, and the Rebuttal Panel Testimony of (John Ruscilli and Elizabeth Rokholm and Shelly Walls), (Ken Ainsworth, Linda Tate and Claude Morton), (Janet Miller Fields and Robby Pannell), (Jerry Wilson, Jimmy Patrick, Pattie Knight and Pat Rand), and (Petra Pryor and Michael Lepkowski), which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*James Meza III*  
James Meza III (KA)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

10689-10696-01

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**CERTIFICATE OF SERVICE**  
**Docket No. 010740-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (\*), (\*\*)**Electronic Mail** and (\*\*\*) **Federal Express** this 27th day of August, 2001 to the following:

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\_\_\_\_\_  
James Meza III (LA)

(+) **Signed Protective Agreement**

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF SANDRA HARRIS  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4 DOCKET NO. 010740-TP  
5 AUGUST 27, 2001  
6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR  
8 POSITION WITH BELL SOUTH TELECOMMUNICATIONS, INC. ("BELL SOUTH").  
9

10 A. My name is Sandra Harris. My business address is 3535 Colonnade Parkway,  
11 Birmingham, Alabama 35243. I am currently Project Manager – Switch Combinations  
12 Products in BellSouth's Network Services Customer Services organization.  
13

14 Q. ARE YOU THE SAME SANDRA HARRIS WHO FILED DIRECT TESTIMONY IN  
15 THIS PROCEEDING ON AUGUST 20, 2001?  
16

17 A. Yes.  
18

19 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?  
20

21 A. My rebuttal testimony responds, in whole or in part, to the testimony of IDS Telecom,  
22 LLC ("IDS") witnesses Mr. Keith Kramer and Ms. Becky Wellman.  
23  
24  
25

1 Rebuttal to the testimony of Mr. Keith Kramer

2

3 Q. ON PAGE 14 OF HIS TESTIMONY, MR. KRAMER ASSERTS THAT BELLSOUTH  
4 SUPPLIED IDS WITH INCORRECT UNIVERSAL SERVICE ORDER CODES  
5 (“USOCs”) AND THAT THESE INCORRECT USOCs CAUSED IDS PROBLEMS  
6 WHEN ATTEMPTING TO CONVERT ITS ACCOUNTS TO UNE-P. WHO AT  
7 BELLSOUTH WAS RESPONSIBLE FOR DEFINING THE PROPER USOCs AN  
8 ALEC SUCH AS IDS WOULD USE ON SUCH ORDERS?

9

10 A. I do not know whether incorrect USOCs caused IDS’ problems in converting to UNE-P.  
11 I must point out, however, that it was the project team’s responsibility to determine the  
12 proper USOCs that would be provided to ALECs. Mr. William Gulas, who at that time  
13 was an employee of BellSouth, was responsible for providing those USOCs to the  
14 ALECs, to BellSouth’s contract negotiators and to the subject matter experts in  
15 BellSouth’s billing group for their use in developing proper rate files. If the USOCs were  
16 wrong, IDS has nobody to blame but Mr. Gulas, who happens to now be an IDS  
17 employee.

18

19 Q. BEFORE YOU ADDRESS MR. KRAMER’S ALLEGATIONS REGARDING  
20 CONVERSIONS FOR END USERS WITH VOICE MAIL SERVICE, PLEASE  
21 DISCUSS THE DIFFERENCES BETWEEN BELLSOUTH VOICE MAIL SERVICE  
22 AND BELLSOUTH’S MEMORYCALL® SERVICE.

23

24 A. The table below sets out the differences between BellSouth Voice Mail and  
25 MemoryCall® Service:

1

<b>BellSouth Voice Mail</b>	<b>MemoryCall® Service</b>
Auto play (Messages Play back-to-back without customer interaction)	Customer must decide to save/delete after every message.
Customer do not have to enter your pass code if customer calls from home	Customer must enter a pass code every time
No requirement for a temporary pass code for mailbox set-up	Customer needs a temporary pass code for mailbox set-up
Customer can reply and send messages to other mailboxes	Customer cannot reply or send messages
Complementary Service Package with *98 access	*98 is not actively sold with MemoryCall
Has a simpler and improved vendor interface	Non-standard interface between vendors
Customer can have multiple lines going to mailbox	Multiple line feature is not available
Customer can purchase other voice mail features such as paging and facsimile “a la carte”	Customer cannot order “a la carte” features.

2

3 Q. ON PAGE 42 OF HIS TESTIMONY, MR. KRAMER ALLEGES THERE WERE  
4 PROBLEMS WITH CONVERTED ACCOUNTS WITH VOICE MAIL SERVICE.  
5 PLEASE COMMENT. (SEE ALSO KRAMER PAGE 66, ITEM 10).

6

7 A. As I discussed in my direct testimony, the documentation that BellSouth provides to  
8 ALECs via BellSouth’s Interconnection Website at

1 <http://www.interconnection.bellsouth.com/> explains that voice mail service is not a  
2 telecommunications service and thus is not available on a UNE-P line. Therefore, if a  
3 retail or resale end user who has voice mail service is converted to a UNE-P, the voice  
4 mail service will not be converted. After conversion to UNE-P, however, the end user  
5 can switch from voice mail service (which is not available with UNE-P) to certain types  
6 of MemoryCall® Service (which are available with UNE-P). Please refer to my direct  
7 testimony for additional details on this issue. As I noted in my direct testimony, while  
8 she was employed by BellSouth, Ms. Wellman incorporated these processes into the  
9 original set of M&Ps used earlier by BellSouth's local carrier service center ("LCSC").  
10 These M&Ps developed by Ms. Wellman have been changed and improved over time and  
11 are not the version now used by LCSC personnel.

12  
13 Q. ON PAGES 37 AND 38 OF HIS TESTIMONY, MR. KRAMER DISCUSSES THE  
14 FALLOUT RATE FOR CONVERSION BY AN ALEC FROM RESALE TO UNE-P.  
15 PLEASE COMMENT.

16  
17 A. Orders will "fallout" for manual processing for a number of different reasons. If the  
18 ALEC's local service request ("LSR") contains missing, incorrect or incomplete  
19 information, the LSR will either be rejected or will fall out to the LCSC for a service  
20 representative to handle manually. Once the LSR is submitted into BellSouth's systems  
21 for further processing, additional checks and edits are performed as the information in the  
22 LSR is used to create a service order within BellSouth's downstream systems and  
23 processes. Incorrect, incomplete or conflicting data will likewise cause the service order  
24 to not be successfully completed until the errors are corrected or missing information is  
25 supplied.

1 Q. ON PAGE 41 OF HIS TESTIMONY, MR. KRAMER CLAIMS THAT 30% OF IDS'  
2 REQUESTS FOR CONVERSION TO UNE-P ENCOUNTER PROBLEMS. ON PAGE  
3 43 OF HIS TESTIMONY, HE CLAIMS THAT ABOUT 50% OF THE CONVERSIONS  
4 ENCOUNTER PROBLEMS. PLEASE COMMENT.

5  
6 A. The testimony of BellSouth's witness Ken Ainsworth discusses the discrepancy between  
7 Mr. Kramer's two statements. As I discussed earlier, however, there are cases in which  
8 BellSouth's retail customers switch from voice mail service to MemoryCall® Service. In  
9 such a case, the customer's voice mail service would be disconnected and the customer  
10 would lose any voice mail messages upon that disconnection. Similarly, if a retail or  
11 resale end user with voice mail service is converted to a UNE-P arrangement with  
12 MemoryCall® Service, the end user's voice mail service is likewise disconnected and the  
13 end user will lose any voice mail messages upon that disconnection. However, if a retail  
14 or resale end user has MemoryCall® service and then is converted to a UNE-P  
15 arrangement, that end user will not experience disconnection or any loss of  
16 MemoryCall® functions. If that is the situation to which Mr. Kramer is referring, then I  
17 disagree with his conclusion that this is a problem that should somehow be corrected  
18 since BellSouth is treating IDS at parity with BellSouth's treatment of its own retail  
19 customers.

20  
21 **Rebuttal to the testimony of Ms. Becky Wellman**

22  
23 Q. ON PAGE 11 OF HER TESTIMONY, MS. WELLMAN DISCUSSES METHODS AND  
24 PROCEDURES ("M&Ps") FOR UNE-P CONVERSIONS. PLEASE COMMENT.

25

1 A. In 1998, Ms Wellman wrote BellSouth's original M&Ps for the Residence, Business and  
2 PBX Network Combinations. As I explained in my direct testimony, these M&Ps called  
3 for the use of the "D&N" process to convert from retail service or resale service to  
4 combinations such as the UNE-P. In February 2000, Ms. Wellman updated the  
5 combination M&Ps that applied to Residence and Business applications to bring these  
6 M&Ps into compliance with the provisions of the FCC's UNE Remand Order. The  
7 updated M&Ps also called for the use of the "D&N" process. I would note, however, that  
8 the original M&P documents Ms. Wellman was involved with have been revised several  
9 times since then.

10

11 Q. PLEASE RESPOND TO MS WELLMAN'S SUGGESTION, ON PAGE 12 OF HER  
12 TESTIMONY, THAT THE UNE-P PROJECT ENCOUNTERED DIFFICULTY WITH  
13 END-USER OUTAGES.

14

15 A. She is incorrect. The UNE-P project team coordinated end-to-end testing for the UNE-P  
16 product in February 2000. No service outages occurred during this end-to-end testing.

17

18 Q. IS MS. WELLMAN CORRECT WHEN SHE STATES, ON PAGE 13 OF HER  
19 TESTIMONY, THAT THE PROJECT TEAM MEMBERS EXPRESSED CONCERN  
20 ABOUT END-USER OUTAGES?

21

22 A. No. Indeed, the project team had great confidence in the quality of its work. The team  
23 was aware, however, that if the D order and the N order were not worked in a coordinated  
24 fashion, a service outage could occur. If, for instance, the D order was worked and the N  
25 order was not, the end user would experience a service outage. Also, if the same physical



1 facilities that had been used to provide the retail or resale services were not reused to  
2 fulfill the N order, the end user would experience a service outage.

3  
4 To address this risk, the project team incorporated into the M&Ps a requirement that a  
5 “reuse” code (“RRSO”) be placed on both the N and the D orders. This reuse code serves  
6 two purposes. First, the RRSO on the N order is associated with the RRSO on the D  
7 order. Thus, one order should not be worked unless the corresponding order is also ready  
8 to be worked. Additionally, the RRSO indicates that the same facilities that had been  
9 used to provide the services that are the subject of the D order should be used to fulfill the  
10 N order.

11  
12 Q. ON PAGES 14-15, MS. WELLMAN DISCUSSES BELLSOUTH’S END-TO-END  
13 TESTING AND SUGGESTS THAT THE USE OF SUBJECT MATTER EXPERTS  
14 SKEWED THE RESULTS OF THOSE TESTS. PLEASE COMMENT.

15  
16 A. I disagree. Process changes are appropriately developed and evaluated by those  
17 employees most familiar with the process being tested and with other inter-related  
18 processes. Contrary to Ms. Wellman’s suggestion, the use of subject matter experts to  
19 perform the testing is entirely appropriate as the test is meant to confirm that the process  
20 achieves the desired results. In fact, during her employment at BellSouth, Ms. Wellman  
21 was one of the subject matter experts called upon to develop, improve and test these  
22 processes. Finally, as discussed by BellSouth witness Janet Miller Fields, BellSouth’s  
23 LCSC service representatives undergo rigorous training and job-related certification  
24 before actually handling ALECs’ LSRs.

1 Q. PLEASE COMMENT ON MS. WELLMAN'S SUGGESTION ON PAGE 15 OF HER  
2 TESTIMONY THAT THE USE OF A SINGLE C ORDER WOULD ELIMINATE ALL  
3 CONVERSION PROBLEMS.

4  
5 A. Obviously, it is impossible to speculate as to the full effect of any future software  
6 development. BellSouth strives to ensure that its processes and systems are updated as  
7 correctly as possible. The reality, though, is that humans create software updates and,  
8 unfortunately, human errors sometimes cause unexpected results or problems. While the  
9 reduction of two orders to one order would alleviate the need for the RRSO code, I  
10 disagree with Ms. Wellman's suggestion that the use of a single C order (or for that  
11 matter, any ordering mechanism) will result in perfect handling of an ALEC's requests,  
12 given the human involvement in the process both by BellSouth's employees and by IDS'  
13 employees. For example, even a perfect software product (were it even possible to create  
14 such in the first place) would not render perfect results if the ALEC intentionally or  
15 unintentionally introduced faulty or missing information into the ordering process.

16  
17 Q. DO YOU AGREE WITH MS. WELLMAN'S CONTENTION, ON PAGE 16 OF HER  
18 TESTIMONY, THAT THE PROJECT TEAM DID NOT HAVE ENOUGH TIME TO  
19 DEVELOP A WORKABLE SINGLE C FORMAT?

20  
21 A. No, I do not agree. The UNE-P project team was aware that the D&N process had  
22 previously been successfully used in June 1999 to convert from retail services or resale  
23 services to network combinations. Because the only difference between the network  
24 combinations product and the UNE-P product was the professional services coordination  
25 fee, the UNE-P project team believed that the D&N process was an acceptable way to

1 process UNE-P conversion orders. Therefore, while the UNE-P team did look at  
2 alternatives to the use of the D&N process, the team did not pursue nor did it recommend  
3 that the UNE-P team be allowed to pursue any alternative for the purpose of delivering  
4 the UNE-P product. The team believed it already had a proven, viable process on which  
5 it could build. The team was not under any undue duress as a result of time constraints.

6  
7 Q. PLEASE RESPOND TO MS. WELLMAN'S CONTENTION, ON PAGE 16 OF HER  
8 TESTIMONY, THAT A BELLSOUTH SENIOR DIRECTOR, MS. PEGGY  
9 CALDWELL, TOLD THE PROJECT TEAM THAT THE UNE-P PROCESS MUST BE  
10 ROLLED OUT BY FEBRUARY 17, 2000, EVEN IF NOT 100% RELIABLE.

11  
12 A. I do not concur in Ms. Wellman's characterization of Ms. Caldwell's directive to the  
13 team. Ms. Caldwell directed the UNE-P project team to deliver a high-quality, FCC-  
14 compliant product by the date required in the FCC's UNE Remand Order.

15  
16 Q. ON PAGE 17 OF HER TESTIMONY, MS. WELLMAN COMPARES BELLSOUTH'S  
17 PROCESSING OF RETAIL ORDERS TO THE PROCESS OF CONVERTING  
18 RETAIL OR RESALE SERVICE TO UNE-P. PLEASE COMMENT.

19  
20 A. Use of a single C order is available for both BellSouth and ALECs when converting from  
21 BellSouth retail to ALEC resale or when converting from ALEC resale to BellSouth  
22 retail. When converting from resale to UNE-P, however, the single C process is not  
23 available for several reasons because, unlike a retail/resale to resale conversion, a resale  
24 to UNE-P conversion does not involve a transfer of like services. As a result, a D&N  
25 process is required because (1) all UNE services are measured, which is not the case with

1 resale; (2) line class codes in BellSouth's Recent Change Memory Administration Group  
2 ("RCMAG") have to change, which allows for the billing of measured elements; (3) daily  
3 usage files have to be created; (4) a final bill has to be issued because billing rates are  
4 different between UNE-P and resale; and (5) not all enhanced services are available in  
5 UNE-P.

6  
7 Simply put, when BellSouth provides resold service to the ALEC, BellSouth bills the  
8 ALEC at resale rates. If the ALEC converts that line from resale to UNE-P, BellSouth  
9 will cease billing the ALEC at resale rates and will begin billing the ALEC at UNE-P  
10 rates. Upon conversion from resale to UNE-P, BellSouth has to generate a final resale  
11 bill for the ALEC, and it has to start billing the ALEC for the UNE-P services BellSouth  
12 is providing to that ALEC. This requires BellSouth to take the steps necessary to  
13 generate these bills, such as changing the line class codes and the USOCs associated with  
14 the service to reflect the fact that UNE-P (rather than resale) service is being provided,  
15 which requires the use of the N&D process rather than use of a single C order.

16  
17 Q. ON PAGES 21 AND 22 OF HER TESTIMONY, MS. WELLMAN SUGGESTS THAT  
18 THE ONLY DIFFERENCE BETWEEN CONVERTING A BELLSOUTH RETAIL  
19 SERVICE TO UNE-P AND CONVERTING AN ALEC'S RESALE SERVICE TO  
20 UNE-P IS THAT WITH UNE-P THERE IS A CHANGE FROM FLAT RATE  
21 SERVICE TO MEASURED RATE SERVICE. IS SHE CORRECT?

22  
23 A. No, as made clear above, there are many differences between resale and UNE-P. In  
24 addition to the change from flat service to measured when converting from resale to  
25 UNE-P, resale is different from UNE-P in many ways, including (1) line class codes in

1 RCMAG have to change, which allows for the billing of measured elements; (2) daily  
2 usage files have to be created; (3) a final bill has to be issued because billing rates are  
3 different between UNE-P and resale; and (4) not all enhanced services are available in  
4 UNE-P, including some billing types of packages (Area Calling Plans, Complete Choice  
5 and the like) and other types of non-telecommunications services such as voice mail  
6 service.

7  
8 Stated another way, if BellSouth is providing resale service it bills the ALEC at resale  
9 rates. The ALEC providing service via UNE-P is billed at UNE-P rates. When an ALEC  
10 resells BellSouth service, the only change that is required is a billing change. That is,  
11 BellSouth renders its former end user customer a final bill, and the ALEC becomes  
12 BellSouth's customer of record. Upon conversion to UNE-P, however, additional detail  
13 is required. The ALEC is no longer purchasing a tariffed service from BellSouth but is  
14 now purchasing a combination of an unbundled loop and an unbundled port.

15  
16 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

17  
18 A. Yes.

19  
20 408123