

1 Bellsouth Telecommunications, Inc.  
2 Rebuttal Panel Testimony of  
3 Janet Miller Fields and Robby K. Pannell  
4 Before the Florida Public Service Commission  
5 Docket No. 010740-TP  
6 August 27, 2001  
7

8 Q. Ms. Miller Fields, please state your full name, your  
9 position with Bellsouth Telecommunications, Inc.  
10 ("Bellsouth") and your business address.

11  
12 A. My name is Janet Miller Fields. I am the Operations Assistant Vice-President for  
13 Customer Care in Bellsouth's Network Services<sup>1</sup> – Customer Services  
14 organization. My business address is 600 N. 19<sup>th</sup> Street, Birmingham, Alabama  
15 35203.

16  
17 Q. Are you the same Janet Miller Fields that filed direct  
18 testimony in this proceeding on August 20, 2001?

19  
20 A. Yes.

21  
22 Q. Mr. Pannell, please state your full name, your position  
23 with Bellsouth and your business address.

24

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<sup>1</sup> My direct testimony incorrectly identified my organization as Network Carrier – Customer Services.

1 A. My name is Robby K. Pannell. I am currently an Industrial Specialist II for  
2 BellSouth Interconnection Sales. My business address is 600 N. 19<sup>th</sup> Street,  
3 Birmingham, Alabama 35203.

4  
5 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND  
6 AND EXPERIENCE.

7  
8 A. I am working toward a degree in Business Administration at Jefferson State in  
9 Birmingham, Alabama. I joined BellSouth in June 1993 where I worked in  
10 Operator Services until 1997. In 1997, I became an LCSC Service  
11 Representative, and I was promoted to LCSC Supervisor in 1998. In 1999, I was  
12 promoted to Complex Center Support Manager, and in 2000, I accepted the  
13 position of District Center Support Manager in the Birmingham LCSC. In June of  
14 this year, I became an Industrial Specialist II.

15  
16 Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

17  
18 A. No.

19  
20 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE  
21 COMMISSION?

22  
23 A. No.

24  
25 Q. WHAT IS THE PURPOSE OF YOUR PANEL TESTIMONY?

1 A. The purpose of our panel testimony is to respond to specific portions of the direct  
2 testimony of IDS' witnesses Keith Kramer and Becky Wellman as filed on July  
3 23, 2001.

4  
5 Q. MS. MILLER FIELDS, PLEASE ADDRESS MR. KRAMER'S CONTENTION  
6 AT PAGE 26 THAT IDS MUST TRAIN BELLSOUTH'S EMPLOYEES IN  
7 THE PROPER PROCESSES TO CONVERT SERVICES FROM RETAIL OR  
8 RESALE TO UNE-P.

9  
10 A. I disagree with Mr. Kramer's contention. In my direct testimony, I detailed the  
11 extensive training provided to BellSouth's LCSC representatives. Alternative  
12 local exchange carriers ("ALECs") are the LCSC's customers. The LCSC  
13 encourages ALECs to refer to an LCSC manager any issues viewed by the ALEC  
14 to be a training opportunity for LCSC service representatives. Any such issues are  
15 addressed individually with the LCSC employees.

16  
17 Q. MS. MILLER FIELDS, ON PAGE 35, MR. KRAMER ALLEGES THAT  
18 THERE ARE TIMES WHEN IDS ISSUES A LOCAL SERVICE REQUEST  
19 ("LSR") AND BELLSOUTH SUBSEQUENTLY ISSUES THE DISCONNECT  
20 ("D") ORDER BUT DOES NOT ALSO ISSUE THE NEW ("N") ORDER.  
21 PLEASE RESPOND.

22  
23 A. As I explained in my direct testimony, the LCSC service representatives are  
24 trained to follow a specific process when issuing these orders. The D and the N  
25 orders are issued sequentially. It is possible for the orders to be separated during

1 processing. However, as explained in the direct testimony of BellSouth witness  
2 Ken Ainsworth, BellSouth has recently conducted an internal maintenance  
3 analysis on UNE-P conversions. The analysis determined that less than 1% of end  
4 users experience loss of dial tone during conversion.

5  
6 Q. MR. PANNELL, PLEASE RESPOND TO MR. KRAMER'S ALLEGATION ON  
7 PAGE 46 OF HIS TESTIMONY THAT ALMOST HALF OF THE  
8 CONVERSION ORDERS IDS SUBMITTED TO BELLSOUTH IN  
9 NOVEMBER 2000 "WERE NOT BEING DONE BY THE PON DUE DATE."

10  
11 A. First, let me explain that BellSouth does not use the terminology "PON due date."  
12 The acronym PON stands for Purchase Order Number, which is used to identify  
13 individual LSRs issued by the ALEC. The ALEC assigns the PON and places that  
14 PON on the LSR it submits to BellSouth. When the ALEC issues the LSR, the  
15 ALEC requests the due date on which it desires the service to be converted.  
16 BellSouth refers to this as the ALEC's Desired Due Date ("DDD"). BellSouth  
17 strives to meet the ALEC's DDD, provided that BellSouth receives from the  
18 ALEC a complete and accurate LSR in time to meet the DDD based on  
19 BellSouth's standard intervals for the service being requested and absent any  
20 unforeseen circumstances.

21  
22 There are several factors that can jeopardize the DDD, many of which would be  
23 caused by the ALEC, including clarifications, rejections and supplemental  
24 requests. Once BellSouth has a complete and accurate LSR from the ALEC,  
25 BellSouth issues the service order and returns to the ALEC a Firm Order

1 Confirmation (“FOC”) with a committed due date, which is the date BellSouth  
2 commits to work the order, absent any unforeseen circumstances.

3  
4 Q. MR. PANNELL, PLEASE RESPOND TO MR. KRAMER’S AND MS.  
5 WELLMAN’S CONTENTIONS THAT, AT VARIOUS TIMES, MS.  
6 WELLMAN HAS INSTRUCTED BELL SOUTH’S LCSC SERVICE  
7 REPRESENTATIVES REGARDING HOW TO CORRECT END-USER  
8 SERVICE OUTAGES. (KRAMER DIRECT, PAGE 47 AND WELLMAN  
9 DIRECT, PAGE 14).

10  
11 A. I understand that Ms. Wellman has contacted the LCSC in the past and attempted  
12 to instruct a service representative. The LCSC, however, does not take instruction  
13 on how to process orders from its customers. BellSouth has documented Methods  
14 and Procedures (“M&Ps”) that provide the LCSC service representatives with this  
15 instruction.

16  
17 On page 4 of Ms Wellman’s direct testimony, she erroneously contends that, to  
18 this day, BellSouth uses the same “M&Ps” developed by Ms. Wellman when she  
19 was employed by BellSouth. This, however, is simply not the case. BellSouth’s  
20 M&Ps have been updated numerous times to reflect enhancements and  
21 modifications needed to improve the ordering process. Obviously, due to these  
22 enhancements and modifications, any instructions that Ms. Wellman would have  
23 provided based on her prior knowledge would likely now be inaccurate and could  
24 directly contradict BellSouth’s current M&Ps.

25

1 Q. MR. PANNELL, PLEASE RESPOND TO MR. KRAMER'S ALLEGATION AT  
2 PAGE 48 THAT HALF OF BELLSOUTH'S LCSC EMPLOYEES "WERE  
3 TAKING DECEMBER [2000] OFF FOR VACATION."

4

5 A. Mr. Kramer's allegation is not supported by the facts. During December 2000,  
6 BellSouth's LCSC was staffed at 85.3% of its normal staffing level. The LCSC  
7 exists solely to serve BellSouth's ALEC customers. BellSouth is committed to  
8 staffing the LCSC to adequately support the volume of orders received from  
9 ALECs at any given time.

10

11 Q. MR. PANNELL, PLEASE RESPOND TO MR. KRAMER'S CONTENTION AT  
12 PAGE 48 THAT DURING A CONVERSATION HE HAD WITH YOU, YOU  
13 INDICATED THAT LENS DID NOT WORK VERY WELL AND YOU  
14 SUGGESTED THAT IDS SHOULD USE CSOTS.

15

16 A. LENS is the acronym for Local Exchange Navigation System, which is one of the  
17 electronic interfaces by which ALECs may submit LSRs to BellSouth. CSOTS is  
18 the acronym for CLEC Service Order Tracking System, which is a graphical user  
19 interface that provides service order status by allowing the ALEC to view its  
20 pending service orders that are associated with any LSRs the ALEC submits.

21

22 Based on my recollection, Mr. Kramer has misrepresented the nature and context  
23 of our conversation. Let me explain my recollection of what transpired. Mr.  
24 Kramer indicated to me that he wanted to know the status of a specific set of  
25 LSRs that IDS has submitted to BellSouth on November 21, 2000. I advised him

1 that, in addition to its ordering capabilities, LENS had the capability to provide  
2 the status of these LSRs. Mr. Kramer expressed to me his displeasure with LENS.  
3 I inquired whether he had access to CSOTS, and he said he did. I explained that  
4 he could use CSOTS to check the status of the service orders issued by BellSouth,  
5 rather than looking at the LSRs themselves. At no time did I say that LENS did  
6 not work well. Neither did I say, as Mr. Kramer contends, that CSOTS was more  
7 accurate for IDS' purposes than LENS. I was simply offering alternatives to Mr.  
8 Kramer to enable him to get the data he wanted.

9  
10 Q. MS. MILLER FIELDS, ON PAGES 49-50, MR. KRAMER CONTENDS THAT  
11 BELL SOUTH BACKDATES THE CONVERSION DATE TO THE "PON DUE  
12 DATE," REGARDLESS OF WHEN THE ACTUAL CONVERSION TOOK  
13 PLACE. PLEASE RESPOND. (SEE ALSO KRAMER, PAGE 68, ITEM 22).

14  
15 A. As Mr. Pannell explained above, BellSouth does not use the terminology "PON  
16 due date." I believe that what Mr. Kramer actually is referring to is the committed  
17 due date returned to IDS via FOC. Again, the committed due date is the date that  
18 BellSouth commits to provide the requested service, absent any unforeseen  
19 circumstances.

20  
21 On a conversion order, it is possible to complete the conversion of the service to  
22 the ALEC without the Customer Service Record ("CSR") being updated on that  
23 same date. This process normally takes 48-72 hours. Occasionally, however, a  
24 problem with the billing system will require manual handling to post the service  
25 order to the CSR. In this case, the committed due date is not affected – that is, the

1 conversion completion date remains unchanged. Once the billing system has  
2 posted the service order, BellSouth renders a final bill to the end user customer.  
3 This bill will indicate that the end user customer ceased to be BellSouth's  
4 customer as of the committed due date on the FOC. BellSouth's billing to the  
5 ALEC will also begin on the committed due date. If there is an overlap between  
6 bills, BellSouth issues an automatic adjustment to the end-user back to the date  
7 the conversion occurred. Therefore, there is no double-billing of the end user  
8 customer, and the actual service completion date is reflected.

9  
10 Q. MR. PANNELL, ON PAGE 50, MR. KRAMER CONTENDS YOU TOLD HIM  
11 THAT "IDS COULD CONSIDER THE CUSTOMER THEIRS AS OF THE PON  
12 DUE DATE." PLEASE RESPOND.

13  
14 A. Again, "PON due date" is not a terminology used within BellSouth, so I am  
15 certain I did not make this statement to Mr. Kramer. In any event, I do want to  
16 respond to Mr. Kramer's discussion about the possibility of IDS' customer  
17 receiving a BellSouth bill and an IDS bill for the same time period.

18  
19 Until the completion of the order is posted to the CSR, BellSouth's billing system  
20 does not and cannot know that the customer is no longer BellSouth's customer.  
21 This is what I meant when I indicated to Mr. Kramer that it would be BellSouth's  
22 problem to correct its billing to the end user customer. When the final bill is  
23 rendered to BellSouth's former customer, any billing that BellSouth might have  
24 done beyond the committed due date will be adjusted accordingly so that the end  
25 user customer does not pay for service from both carriers for any period of time.



1 Q. MR. PANNELL, PLEASE ADDRESS MR KRAMER'S CONTENTION AT  
2 PAGE 54 THAT BELLSOUTH "BACKDATED EVERY CONVERSION THEY  
3 [BELLSOUTH] HAD DONE THROUGH NOVEMBER AND DECEMBER  
4 2000 AND CHARGED IDS FOR THEM."

5  
6 A. This is actually the same issue that I addressed above. Because the customer  
7 becomes IDS' customer as of the committed due date, it is appropriate that  
8 BellSouth begin billing IDS for services rendered to IDS as of that date. As I have  
9 explained, there can be a time period between the committed due date and the date  
10 the order posts to the CSR. However, when BellSouth renders its final bill to its  
11 former customer, any necessary adjustments will be made to reflect that  
12 BellSouth's billing to the end user customer ceased as of the committed due date.

13  
14 Q. MS. MILLER FIELDS, PLEASE RESPOND TO MS. WELLMAN'S  
15 COMMENTS AT PAGE 15 REGARDING THE METHODS USED BY  
16 BELLSOUTH DURING ITS PROCESSING OF LSRs FOR KPMG.

17  
18 A. As the Commission knows, KPMG is conducting third-party testing of  
19 BellSouth's operations support systems ("OSS"). When orders placed by KPMG  
20 fall out for manual handling by the LCSC service representatives, KPMG's orders  
21 are processed in exactly the same manner as any ALEC's orders. That is, each  
22 service representative claims the next available order in Local Exchange Ordering  
23 ("LEO") for processing.

24  
25 Q. MS. MILLER FIELDS, WHEN THERE IS A PENDING ORDER TO

1 CONVERT A BELLSOUTH END USER TO AN ALEC, WHO CAN CANCEL  
2 THAT ORDER?

3

4 A. If the conversion order has not been completed, and the end user wants to cancel  
5 the conversion order, only the LCSC can cancel the order. The LCSC will not  
6 cancel the order unless instructed by the ALEC to do so on the end user's behalf.

7

8 Q. MS. MILLER FIELDS, DOES THIS CONCLUDE YOUR TESTIMONY?

9

10 A. Yes.

11

12 Q. MR. PANNELL, DOES THIS CONCLUDE YOUR TESTIMONY?

13

14 A. Yes.

15

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