



NETWORK TELEPHONE
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011077-TL

September 7, 2001

Mr. Walter D'Haeseleer, Director
Division of Competitive Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RE: Informal Complaint of Network Telephone against BellSouth

Dear Mr. D'Haeseleer:

Network Telephone (NTC) requests investigation of BellSouth's \$20,948.13 charge for 30-day historical information from the Access Daily Usage File (ADUF), and BellSouth's lack of response to NTC's requests for information and assistance.

During the first quarter of 2001, Network Telephone began to implement plans to use the switched/combo platform (UNE-P). This was a new platform for NTC, and we had numerous meetings with our BellSouth Account Team in preparation for conversion to this platform. We were aware of problems other companies had implementing UNE-P, and specifically asked BellSouth to provide us with subject matter experts to help us through the process. We also asked for a UNE-P expert to be added to our account team.

BellSouth refused our requests, and told us that our current account team was capable of helping us implement UNE-P, and of advising us of everything we needed to do for implementation. NTC also took the extra step of contracting for BellSouth to provide an in-house training course on UNE-P.

As part of the implementation process, we had several discussions with BellSouth on the use of the ADUF files so Network Telephone could bill access charges. We told BellSouth we would need the files and assumed we would begin receiving the information when we began provisioning with UNE-P. **At no point did BellSouth advise us of a special procedure required for us to begin receiving the ADUF files.** When we did not receive the files, we contacted BellSouth to inquire about them. At this point, BellSouth said we had to make a written request to begin receiving the ADUF files.

While it is true that our extremely lengthy interconnection agreement does indicate that a written request is required to begin receiving the ADUF files, it is Network Telephone's contention that this fact does not absolve BellSouth of responsibility for directly advising us of the process, particularly after our repeated requests for subject matter experts to help us with UNE-P implementation.

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Because receipt of these files is required for Network Telephone to bill other carriers for access, we asked BellSouth to retrieve the historical ADUF information that we did not receive prior to late July. BellSouth responded that there would be a charge for retrieval of the files. The price BST quoted to us for providing historical ADUF records for 30 days was \$20,948.13. The price quoted to retrieve the information for 60 days was "estimated" at \$500,000. A copy of these quotes and BellSouth's documentation is attached.

These charge are patently ridiculous. BST has ready access to the information. BST quickly provided the number of messages and the dates on which the messages were sent, but claimed other detail was not readily available. They also acknowledged that the information had not been lost and that as time passed "the price could possibly change." Network Telephone had no choice but to take immediate action to pay for the 30-day retrieval in order allow for our CABS billing.

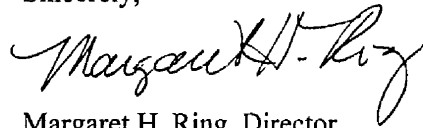
This situation is just another example of BellSouth's lack of responsiveness and intention to run roughshod over its competitors in any way possible. It is extremely difficult to run a competitive business when we are faced with lack of cooperation from BellSouth, who is our vendor, and astronomical prices for data retrieval.

Network Telephone requests that the PSC investigate this situation, review BellSouth's pricing methodology for the data retrieval, and require BellSouth to make refunds to Network Telephone for these charges.

I appreciate your consideration of this complaint. I am also including an additional copy of this letter to be placed in the correspondence side of Docket 011077-TL, the Commission's investigation into allegations of anti-competitive behaviors and practices of BellSouth Telecommunications.

Thank you for your assistance.

Sincerely,



Margaret H. Ring, Director
Regulatory Affairs

cc: Docket 011077-TL

Encl: BellSouth Letter/Documentation



BellSouth Interconnection Services

9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

August 27, 2001

Mr. Mitch Dantin
Network Telephone, Inc.
815 South Palafox
Pensacola, Florida 32501

Dear Mitch:

This is to inform you of the cost associated with your Access Daily Usage Files (ADUF) request. As outlined to you verbally, the cost that will be incurred by Network Telephone for BellSouth to pull the ADUF feeds going back thirty - (30) days to June 27, 2001 through July 31, 2001 is estimated at \$20,948.13. BellSouth will need a check of available funds in hand before the work to pull these feeds begins.

If BellSouth were to go back sixty - (60) days to May 31, 2001, the cost associated with this would be estimated at \$500,000. Going back sixty - (60) days would call for BellSouth to actually re-create all of Network Telephone's records back to that time frame as the records are not readily available that far back in time. This would involve a much more extensive programming job than going back the aforementioned thirty - (30) days and therefore would cost significantly more. If Network Telephone would like an exact quote for going back sixty - (60) days, please notify BellSouth in writing. Due to the significant work required, BellSouth will charge NTC for preparing the sixty - (60) day estimate even if NTC chooses not to accept the work.

Keep in mind that as time continues to pass, it is more difficult to pull this information and as a result, the price could possible change for the thirty - (30) day request. Therefore, BellSouth will need to know in writing by COB Friday, August 31, whether or not Network Telephone wants BellSouth to process this work request to avoid any possible price changes.

Attached are the details surrounding the thirty - (30) day work request. Please feel free to call me at (205) 321-4958 if you have additional questions regarding this issue.

Regards,

A handwritten signature in black ink, appearing to read 'Scott Griffin', written over a white background.

Scott Griffin
Account Manager
BellSouth Interconnection Services

cc: Bill French
Attachments



WORK REQUEST CONCEPTUAL DESIGN DOCUMENT (X031)

The Work Request Conceptual Design Document contains the high-level technical design of the work request. It is created as a result of requirements analysis activities. Use this document template to confirm the requirements prior to developing a detailed design. This template has been customized for Billing. For new development work or complex enhancements, use the BellSouth Accenture Sourcing Arrangement (BASA) standard X031 as reference.

Estimated Total Number of Work Hours: 184.5

WORK REQUEST NAME:	Network Telephone needs ADUF messages	W/R NUMBER:	01073001
PROCESS NAME:	BellSouth Industrial Billing System (BIBS)	TARGET RELEASE:	WSHL01M8
IMPACTED AREAS:	INDU~BIBS		
EXTERNAL ENTITIES - INPUT:	N/A		
EXTERNAL ENTITIES - OUTPUT:	Recovered ADUF records		
DEFINITION DESCRIPTION: (INCLUDE PURPOSE)	Recover ADUF records for OCN 8773 from June 27, 2001 to July 31, 2001.		
PRE-CONDITIONS:	Able to recall and transmit the Production backup files that were created during that timeframe.		
PROCESS STEPS:	<u>INDU~BIBS</u> Requirement 18010 version 3 - <ol style="list-style-type: none"> 1.) Recall the Backup datasets 'QD10?.BU1.PFA20.BADUF00' in all 12 production sites. 2.) Transmit the backup datasets to TestBed (site U). 3.) Using the File-aid 'Contains' command to extract the ADUF records with an OCN of 8773 and a Basic Class of Service of 'UEPBX'(Business) or 'UEPRX' (Residential) or 'UEPCO' (Coin). 		

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P:\Customer Profiles\Network Telephone\ntwk_telADUF.doc

8/30/2001



WORK REQUEST CONCEPTUAL DESIGN DOCUMENT (X031)

	<p>4.) For all sites, merge all the individual extract ADUF files with OCN 8773 into 1 file with a header and trailer record.</p> <p>5.) Contact WR Item Coordinator, so the file can be reviewed and BIBS receives permission to send file to OCN 8773.</p> <p>6.) Transmit this combined data set to the appropriate Production site.</p> <p>7.) Via ETRS, request a 1-time job to run in the production site to copy the transmitted data set to the GDG base 'QD10?.BU1.PFA20.BADUF00'. Notify the ADUF person to let them know that BIBS has attached an extra data set that was created via this method.</p>
POST-CONDITIONS:	N/A
ASSOCIATED REQUIREMENTS:	N/A
ASSUMPTIONS:	N/A
PERFORMANCE REQUIREMENTS:	N/A
GLOSSARY:	<p>ADUF - Daily Access Usage</p> <p>BIBS - BellSouth Industrial Billing System</p> <p>ETRS - Automated system for requesting 1 time jobs to run in production.</p> <p>GDG - Generation Data Group</p> <p>OCN - Other Carrier Number</p>

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SYSTEM RULES
N/A

DATA MODEL
N/A

APPLICATION ARCHITECTURE IMPACT WHERE PERFORMED (SITES): This will happen in all production RAO sites
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VOLUME	N/A
VOLUME PERIOD:	N/A
MAXIMUM VOLUME:	N/A
MINIMUM VOLUME:	N/A
AVERAGE VOLUME:	N/A

Product Test Approach

This section describes the work request level test approaches for product test.

Note Work request specific risks, including those associated with the testing effort, are documented in CMTS.

Product Test Approach, T910Test Objectives and Scope

See T905 on the O: drive.

Test Resources and Work Plan

Eric Samblanet (BIBS) and Edward Russell (BBI) will participate in the UAT Walkthru.

COMMENTS: N/A

PREPARED BY: Eric Samblanet

DATE: 08/17/2001

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