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September 17, 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

Re: Docket No. 010740-TP (IDS Telcom)

Dear Ms. Bayó:

Please find enclosed an original and fifteen copies of BellSouth Telecommunications, Inc.'s Supplemental Testimony for Janet Miller Fields, Jimmy Patrick, Pat Rand, John Ruscilli and Linda Tate, 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,

Patrick W. Turner
Patrick W. Turner (KA)

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

*11543-01 through
11547-01*

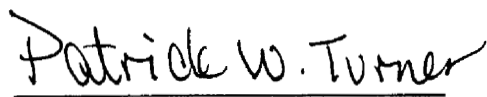
CERTIFICATE OF SERVICE
Docket No. 010740-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
by (*) Hand Delivery and Federal Express this 17th day of September, 2001 to the
following:

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Patrick Turner (LA)

(+) Signed Protective Agreement

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BELLSOUTH TELECOMMUNICATIONS, INC.
SUPPLEMENTAL REBUTTAL TESTIMONY OF
JANET MILLER FIELDS
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 010740-TP
SEPTEMBER 17, 2001

Q. PLEASE STATE YOUR FULL NAME, YOUR BUSINESS ADDRESSES,
AND YOUR POSITION WITH BELLSOUTH.

A. My name is Janet Miller Fields. I am the Operations Assistant Vice -
President for Customer Care in BellSouth's Network Services – Customer
Services organization. My business address is 600 N. 19th Street,
Birmingham, Alabama 35203.

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. On August 20, 2001, I filed direct testimony in this proceeding, and
on August 27, 2001, I filed panel rebuttal testimony with BellSouth witness
Robby K. Pannell.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL
TESTIMONY?

1 A. The purpose of my supplemental rebuttal testimony is to generally
2 address the documents included in IDS' Second Supplemental Response
3 to BellSouth's Interrogatory No. 73, which asked IDS to identify and
4 describe any documents that support Mr. Kramer's contention, on page 16
5 of his direct testimony, that "[t]he very next week after the first problems
6 had been solved, IDS attempted to start converting our existing customer
7 base to UNE-P and we discovered that BellSouth had placed a local PIC
8 'freeze' on our resale customers – essentially blocking our ability to
9 convert these customers to UNE-P." On page 34 of his replacement
10 rebuttal testimony, Mr. Kramer clarifies that the "[r]eference in my direct
11 testimony to a Local PIC Freeze should have been to a Local Service
12 Freeze." My testimony, therefore, only addresses the Local Service
13 Freeze.

14
15 Q. DO THE DOCUMENTS IDS PRODUCED IN ITS SECOND
16 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 73
17 SUPPORT ANY CONTENTION THAT BELL SOUTH EITHER PLACED A
18 LOCAL SERVICE FREEZE ON IDS' RESALE ACCOUNTS WITHOUT
19 IDS' KNOWLEDGE OR SOMEHOW ALTERED A LOCAL SERVICE
20 FREEZE THAT IDS HAD ASKED BELL SOUTH TO PLACE ON THE
21 ACCOUNTS?

22
23 A. No. As I explained in my direct testimony, on a resale or UNE-P account,
24 BellSouth's customer is the ALEC, and only that ALEC can request,
25 remove, or change a Local Service Freeze. Further, once BellSouth

1 placed a Local Service Freeze on IDS' resale accounts at the request of
2 IDS, BellSouth did nothing to alter the freeze.

3
4 The documents produced by IDS in its Second Supplemental Response
5 to BellSouth's Interrogatory No. 73 discuss the Local Service Freeze that
6 IDS itself asked BellSouth to place on IDS' resale accounts. When
7 converting a customer from resale to UNE-P, the existence of a Local
8 Service Freeze will result in the local service request ("LSR") being auto-
9 clarified back to the ALEC with information that the account cannot be
10 converted because of the Local Service Freeze. This happens because
11 an ALEC's resale accounts with BellSouth are established with a specific
12 Operating Company Name ("OCN"), and BellSouth's billing to the ALEC is
13 established on a resale Billing Account Number ("BAN"). Because UNE-P
14 is a unique and different service type from resale, an ALEC's UNE-P
15 accounts with BellSouth are established with a separate and distinct
16 alternate exchange carrier name ("AECN") and BAN. Therefore, when
17 converting an order from resale to UNE-P, the electronic ordering system
18 cannot identify that the local service provider is the same on both
19 accounts.

20
21 As I have explained, at IDS' request, BellSouth placed a Local Service
22 Freeze on specific IDS' resale accounts. Once the Local Service Freeze
23 was in place, BellSouth did not change or alter the Local Service Freeze
24 that IDS had asked BellSouth to place on IDS' resale accounts. Instead,
25 as I have explained, conversion orders on accounts with Local Service

1 Freezes are clarified back to the ALEC so that the ALEC (which is the
2 entity that asked BellSouth to place the Local Service Freeze on the
3 account in the first place) can submit an order lifting the Local Service
4 Freeze prior to converting the account from resale to UNE-P.

5

6 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL
7 TESTIMONY?

8

9 A. Yes.

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