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October 3, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850


Re: 960786-A-TL (Section 271)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Revised Direct Testimony of Wylie (Jerry) G. Latham, W. Keith Milner and Thomas G. Williams, and Revised Surrebuttal Testimony of Ken L. Ainsworth, Cynthia K. Cox (CKC-10 has also been stricken), W. Keith Milner, Ronald M. Pate, David T. Scollard, and Alphonso Varner, which we ask that you file in the captioned docket. This filing is pursuant to Order No. PSC-01-1830-PCO-TL issued September 11, 2001.

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 of record as shown on the certificate of service.

Sincerely,


Lisa S. Foshee (KA)

Enclosures

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

DNS 12566-01 thru 12574-01

**CERTIFICATE OF SERVICE
DOCKET NO. 960786-A-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 3rd day of October, 2001 to the following:

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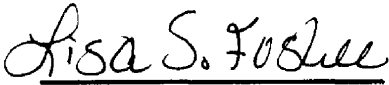
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(+) Signed Protective Agreement

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BELLSOUTH TELECOMMUNICATIONS, INC.
REVISED SURREBUTTAL TESTIMONY OF RONALD M. PATE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 960786A-TL
OCTOBER 3, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing. I joined BellSouth in 1987, and have held various positions of increasing responsibility since that time.

1

2 Q. HAVE YOU TESTIFIED PREVIOUSLY?

3

4 A. Yes. I have testified before the Public Service Commissions in Alabama,
5 Florida, Georgia, Louisiana, South Carolina, Kentucky, the Tennessee
6 Regulatory Authority and the North Carolina Utilities Commission.

7

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9

10 A. The purpose of my revised surrebuttal testimony is to rebut the testimony
11 filed on July 20, 2001, by Steven Turner and Judy Wheeler of AT&T.

12

13 Q. IN WHAT CONTEXT SHOULD YOUR TESTIMONY BE READ?

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15 A. My testimony should be read in conjunction with other surrebuttal
16 testimony supporting BellSouth's 271 application. Additionally, I will refer
17 to the affidavit of William N. Stacy, filed May 31, 2001 ("Stacy Affidavit
18 filed May 31, 2001") in this proceeding as notification of BellSouth's intent
19 to file such affidavit before the Federal Communications Commission.

20

21 Further, for the convenience of this Commission, a list of acronyms has
22 been provided in Exhibit OSS-1 to the Stacy Affidavit filed on May 31,
23 2001.

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25 Q. DO YOU HAVE PRELIMINARY COMMENTS?

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A. Yes. In this testimony, I will address the issues that have been raised by the Alternative Local Exchange Carriers (“ALECs”) by topic and category within those topics. Many of the issues raised in this proceeding are currently being handled collaboratively by BellSouth and the ALECs through the regional Change Control Process (“CCP”), or otherwise dealt with by this Commission.

Pre-Ordering through LENS

Q. ON PAGES 8-9 OF HER TESTIMONY, MS. WHEELER OF AT&T COMPLAINS THAT BELLSOUTH DOES NOT PROVIDE THE ABILITY TO ELECTRONICALLY TRANSFER CUSTOMER INFORMATION FROM A PRE-ORDERING INTERFACE TO AN ORDERING INTERFACE WITHOUT MANUAL PROCESSING. PLEASE COMMENT.

A. BellSouth does not understand why AT&T says it is a problem to transfer customer service record information, when AT&T's Mr. Bradbury has confirmed in another 271 proceeding that parts of AT&T have integrated TAG pre-ordering with an EDI ordering interface. (See June 28, 2001 proceedings before the Alabama Public Service Commission, Docket 25835, Cross-Examination of Jay M. Bradbury, at 2998 (“I do know that we have integrated in the past TAG with the EDI interface and I know that work has been done there and I would assume it's still going on.”)).

1 Also, ITC DeltaCom confirms that it has integrated its TAG and EDI
2 interfaces. (See June 29, 2001 proceedings before the Alabama Public
3 Service Commission, Docket 25835, Cross-Examination of Mary
4 Conquest, at 3636-3637).

5
6 MCI/WorldCom has also integrated TAG pre-ordering and EDI ordering, at
7 least to the extent that end-user address information from the pre-ordering
8 transaction is automatically populated on the local service request ("LSR").
9 (See June 31, 2001 proceedings before the Alabama Public Service
10 Commission, Docket 25835, Cross-Examination of Sherry Lichtenberg, at
11 4635-4636).

12
13 Evidently, AT&T and other ALECs are using the machine-to-machine
14 integrateable TAG and EDI interfaces. However, if AT&T Broadband has
15 made the business decision to use the human-to-machine interface
16 (LENS) for pre-ordering, then it must accept that the integrateable
17 machine-to-machine functionality is not available.

18
19 **ORDERING**

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21 **Ordering of Line Splitting**

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23 Q. ON PAGE 23, MR. TURNER OF AT&T STATES THAT ALECS ARE
24 "FORCED TO SIT ON THE SIDELINES" BECAUSE BELLSOUTH DOES
25 NOT PROVIDE ELECTRONIC OSS FOR ALEC LINE SPLITTING

1 ORDERS, HE ALSO INDICATES CONCERN REGARDING THE
2 PROCESSING OF MANUALLY SUBMITTED ORDERS. PLEASE
3 COMMENT

4

5 A. As Mr. Turner is aware, BellSouth's Line Splitting service became
6 available on June 19, 2001. To date, BellSouth has received no firm
7 orders for Line Splitting. AT&T and other ALECs participated in the
8 BellSouth Line Splitting Collaborative and AT&T has been one of the test
9 partners for the manual ordering and maintenance processes developed
10 by the team. Further, nondiscriminatory access to mechanized OSS
11 providing pre-ordering, provisioning, maintenance and repair, and billing
12 for loops used in Line Splitting arrangements is currently in place, and has
13 been available since June 19, 2001.

14

15 BellSouth has also been working with AT&T as part of the Line Splitting
16 Collaborative, to develop the electronic ordering processes. A fully
17 mechanized ordering capability is currently underway, and will allow
18 ALECs to mechanically order Line Splitting services via existing electronic
19 OSS, including TAG, EDI, LENS, and RoboTAG™. BellSouth anticipates
20 having it completed in time to meet the Georgia PSC xDSL UNE Order
21 dated June 11, 2001 that requires BellSouth to complete development of
22 its mechanized ordering process by December 11, 2001. ALECs will be
23 notified via a Carrier Notification Letter when the mechanized functionality
24 will be available.

25

1 Mr. Turner's concern regarding the processing of manual orders is also
2 without merit. According to the processes which AT&T helped develop,
3 manually submitted requests for Line Splitting will be worked in the same
4 intervals as Line Sharing requests (currently 3 business days for 1-4
5 telephone numbers ("TNs"), 5 business days for 5-9 TNs, individual case
6 basis for 10 or more TNs), and will be processed in an accurate, timely
7 manner by BellSouth's trained Local Carrier Service Center ("LCSC")
8 representatives. Manually submitted LSRs today utilize the same ordering
9 systems that will be utilized with the electronic interface.

10
11 Accordingly, AT&T is not "forced" to sit on the sidelines; they have simply
12 chosen not to submit manual orders for Line Splitting in the interim period
13 until the mechanized process is implemented.

14
15 **STABILITY AND AVAILABILITY OF BELLSOUTH'S INTERFACES FOR**

16 **ALECS**

17

18 **System Outages**

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20 Q. DO YOU AGREE THAT BELLSOUTH HAS FAILED TO NOTIFY AT&T
21 WHEN SYSTEM OUTAGES OCCUR?

22

23 A. No, I do not agree. BellSouth acknowledges that it incurred EDI system
24 outages during the transition to a new EDI translator. The EDI outage Ms.
25 Wheeler mentioned followed the normal outage notification process as

1 described in CCP Document Version 2.5. Whenever there is a system
2 outage that is not resolved within 20 minutes, a notification is provided via
3 e-mail and posted to the Change Control Website at:
4 ([http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_edi.ht](http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_edi.html)
5 [ml](http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_edi.html)) within 15 minutes of the outage verification. An e-mail notification was
6 provided to our customers on May 21, 2001, and was also clearly noted
7 on the BellSouth Change Control Website as well. BellSouth restored
8 service on May 21st, and normal processing resumed and the backlog of
9 previously unprocessed messages appeared to have been cleared.
10 However, on May 29, 2001, BellSouth did learn that some inbound and
11 outbound files for some customers had not cleared or processed as
12 previously believed on May 21st. BellSouth immediately began to work
13 with those affected customers to remedy the situation and all outstanding
14 files from May 21st were then processed.

15
16 Ms. Wheeler is correct that AT&T did not receive FOCs on LSRs
17 submitted for ported orders on June 4th, 5th and 6th. Our investigation of
18 this problem revealed that there was a previously announced Local
19 Number Portability ("LNP") release on the weekend of June 2nd and 3rd.
20 During the release implementation, there was an undetected programming
21 glitch that was not found during the normal system testing process.
22 BellSouth was unaware of this problem until an inquiry was made to the
23 LCSC on June the 18th. The ensuing investigation revealed the error.
24 The programming was corrected on June 19th, and BellSouth worked with

1 AT&T in an effort to get the approximately 1,400 missing responses AT&T
2 as quickly as possible.

3
4 BellSouth is continually working to monitor and enhance all of our OSS on
5 an ongoing basis in an effort to prevent any outage situations. However,
6 there are times when unscheduled outages or glitches suddenly occur. In
7 the event that this type of situation does occur, BellSouth has competent
8 and well-trained technical support in place to address the situation as
9 quickly as possible.

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11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

12

13 A. Yes.

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