

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF W. KEITH MILNER  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4 DOCKET NO. 020129-TP  
5 JULY 22, 2002  
6

7 Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR  
8 POSITION WITH BELL SOUTH TELECOMMUNICATIONS, INC.  
9 ("BELL SOUTH").  
10

11 A. My name is W. Keith Milner. My business address is 675 West Peachtree  
12 Street, Atlanta, Georgia 30375. I am Assistant Vice President -  
13 Interconnection Operations for BellSouth. I have served in my present  
14 role since February 1996.  
15

16 Q. ARE YOU THE SAME W. KEITH MILNER WHO EARLIER FILED  
17 DIRECT TESTIMONY IN THIS DOCKET?  
18

19 A. Yes.  
20

21 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?  
22

23 A. I respond to portions of the direct testimonies of Ms. Wanda G. Montano  
24 on behalf of US LEC of Florida, Inc. ("US LEC") and Mr. Steve

1 Brownworth on behalf of ITC^DeltaCom Communications  
2 (“ITC^DeltaCom”) with regard to issues 2 and 7.

3

4 **Issue 2: Did BellSouth provide CCS7 access service to ALECs, IXCs, and**  
5 **other carriers prior to filing its CCS7 Tariff?**

6

7 Q. PLEASE ADDRESS MR. BROWNORTH’S COMMENTS ON PAGE 5  
8 OF HIS TESTIMONY REGARDING THE PURPOSE OF BELLSOUTH’S  
9 CCS7 ACCESS SERVICE.

10

11 A. The implementation of the CCS7 tariff provides for the appropriate billing  
12 of certain carriers’ messages that are transported by BellSouth. Until  
13 recently, BellSouth has been unable to count individual Integrated Service  
14 Digital Network User Part (“ISUP”) and Transaction Capabilities  
15 Application Part (“TCAP”) messages that are transported by BellSouth for  
16 another carrier. Thus, until BellSouth developed the ability to count such  
17 messages, BellSouth was unable to bill customers on a per message  
18 basis for this service that it was providing them.

19

20 **Issue 7: Under BellSouth’s CCS7 Access Arrangement Tariff, is BellSouth**  
21 **billing ISUP and Transactional Capabilities Application Part (“TCAP”)**  
22 **messages charges for calls that originate on an ALEC’s network and**  
23 **terminate on BellSouth’s network? If so, is it appropriate?**

24

25 Q. ON PAGE 4 OF MS. MONTANO’S TESTIMONY, SHE DISCUSSES

1 TCAP MESSAGES AND STATES THAT THESE CHARGES ARE FOR  
2 ACCESS TO THE DATABASES. IS SHE CORRECT?

3

4 A. No. Ms. Montano states the TCAP messages are charged to carriers on a  
5 per dip basis for access to databases. While she is correct that many  
6 database providers do indeed charge on a per dip basis for access into  
7 their database, that charge is for the actual dip into the database, not the  
8 use of the CCS7 Network (that is, signaling links, Signal Transfer Points,  
9 etc.) to reach that database. Further, not all TCAP messages reach  
10 databases in the traditional sense. Custom Local Area Switching Services  
11 ("CLASS") related TCAP messages often simply pass between central  
12 offices and never reach a Service Control Point ("SCP") type database. In  
13 such a case there is no per dip charge applied because the capability to  
14 record that "dip" in the central office doesn't exist. Again, this charge for  
15 TCAP messages is simply for the use of the BellSouth CCS7 Network, not  
16 for the use of any database.

17

18 Q. DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?

19

20 A. Yes.