

ORIGINAL



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February 20, 2003

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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06 FEB 20 AM 10: 08
COMMISSION
CLERK

Re: Docket No. 020960-TP
Petition for arbitration of open issues resulting from interconnection
negotiations with Verizon Florida Inc. by DIECA Communications, Inc.
d/b/a Covad Communications Company

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of the Rebuttal Testimonies of
Ronald J. Hansen, David J. Kelly/John White, Faye H. Raynor and Alice B. Shocket/
Don Albert on behalf of Verizon Florida Inc. in the above matter. Service has been
made as indicated on the Certificate of Service. If there are any questions regarding
this matter, please contact me at 813-483-2617.

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____
Sincerely,
[Signature]
Kimberly Caswell
KC:tas
Enclosures

SHOCKET/ALBERT
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01804 FEB 20 03
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[Signature]

FPSC-BUREAU OF RECORDS

HANSEN
DOCUMENT NUMBER-DATE
01801 FEB 20 03

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KELLY/WHITE
DOCUMENT NUMBER-DATE
01802 FEB 20 03

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RAYNOR
DOCUMENT NUMBER-DATE
01803 FEB 20 03
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Rebuttal Testimonies of Ronald J. Hansen, David J. Kelly/John White, Faye H. Raynor and Alice B. Shocket/Don Albert on behalf of Verizon Florida Inc. in Docket No. 020960-TP were sent via U.S. mail on February 20, 2003 to the parties on the attached list.



for Kimberly Caswell

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Petition by DIECA Communications, Inc.)
d/b/a Covad Communications Company for)
Arbitration of Interconnection Rates, Terms,)
and Conditions and Related Arrangements)
with Verizon Florida Inc. Pursuant to)
Section 252(b) of the Telecommunications)
Act of 1996)

Docket No. 020960-TP

**REBUTTAL TESTIMONY OF
RONALD J. HANSEN
ON BEHALF OF
VERIZON FLORIDA INC.**

FEBRUARY 20, 2003

DOCUMENT NUMBER-DATE

01801 FEB 20 8

FPSC-COMMISSION CLERK

1 **Q. DOES COVAD RAISE ANY OTHER EXAMPLES OF BACKBILLING?**

2 A. Ms. Evans and Mr. Clancy point to a February 2002 bill, which Covad
3 has discussed in other state regulatory proceedings. *See id.* at 6. The
4 work for which Covad was billed was performed in December 2001,
5 which means that this bill is not an example of billing outside of the one-
6 year limitation period that I understand Covad seeks to impose.

7

8 **Q. DID THIS BILL INCLUDE CHARGES FOR SERVICES THAT COVAD
9 ORDERED IN FLORIDA?**

10 A. No. Although Ms. Evans and Mr. Clancy note that the charges were for
11 “nine different states,” Florida was not one of those states. *Id.*

12

13 **Q. DOES COVAD IDENTIFY ANY BILLING ISSUES SPECIFIC TO
14 FLORIDA?**

15 A. No. Ms. Evans and Mr. Clancy make general reference to billing claims
16 in New York and in the “Verizon East region” (that is, the former Bell
17 Atlantic service areas, which do not include Florida). *Id.* at 11. Ms.
18 Evans and Mr. Clancy also make a vague reference to supposedly
19 improper actions “in the Verizon West region,” that is, somewhere in the
20 approximately 20 states where the incumbent local exchange carrier
21 (“ILEC”) formerly known as GTE operates. *Id.* at 12. Although Florida is
22 among the jurisdictions that make up the Verizon West region, Covad
23 does not claim that Verizon took these actions in Florida, nor does it
24 identify in which of those jurisdictions these actions supposedly took
25 place or at what time.

1 Q. CAN YOU DESCRIBE VERIZON'S PROCESSES FOR TRACKING
2 ALECS' BILLING DISPUTES IN FLORIDA?

3 A. In my direct testimony, I previously explained that Verizon is in the
4 process of implementing the Wholesale Claims and Inquiry Tracking
5 ("WCIT") system, which will enable Verizon also to identify billing
6 disputes using a claim number that the ALEC submitting the dispute
7 assigns (assuming the ALEC enters a claim number when submitting
8 the claim). I also described a process that Verizon has implemented in
9 the interim, which I would like to clarify. Currently, in Florida, Verizon
10 uses an ALEC's claim number (assuming one is provided when the
11 ALEC submits the billing dispute), in addition to the Verizon-assigned
12 claim number, on all correspondence relating to an ALEC's claims
13 regarding UNE, resale, and collocation products.

14

15 Q. CAN YOU RESPOND TO COVAD'S CLAIM THAT IT HAS
16 DIFFICULTY IDENTIFYING CLAIMS AND CREDITS IF VERIZON
17 DOES NOT USE ITS TRACKING NUMBER? (Evans/Clancy Joint
18 Direct Testimony at 9-10)

19 A. Yes. Although I cannot speak to how Covad has chosen to structure its
20 internal billing operations, Verizon currently provides Covad with more
21 than sufficient information to track and identify billing claims and credits.
22 After Covad submits a dispute, Verizon returns an acknowledgement
23 that contains both the Verizon claim number and the Covad-assigned
24 claim number (assuming Covad assigned one when it submitted the
25 claim). Thus, shortly after Covad submits the dispute, it receives a

1 document that clearly links the Verizon claim number not only to the
2 Covad billing dispute, but also to the Covad claim number.

3

4 If Verizon resolves a dispute in Covad's favor, it informs Covad of the
5 amount of the credit Covad will receive and the month and bill where the
6 credit will appear. That communication also contains both the Verizon
7 claim number and the Covad-assigned claim number (again, assuming
8 Covad assigned one). The credits appear as line items on Covad's bills,
9 enabling Covad to match the credit on the bill to the credit that Verizon
10 informed Covad it would receive as well as to the claim numbers.

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12 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

13 A. Yes.

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