

ORIGINAL

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July 25, 2003

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

Re: **030349-TP (Supra \$75 Cash Back Promotion)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Ronald Pate, John A. Ruscilli, Tamra Schoeche, Michelle N. Summers, and Edward Wolfe, 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,

E. Earl Edenfield, Jr.
E. Earl Edenfield, Jr. (VA)

Enclosures

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

Pate - 06747-03
Ruscilli - 06748-03
Schoeche - 06749-03
Summers/Wolfe - 06750-03

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ECR _____
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OPC _____
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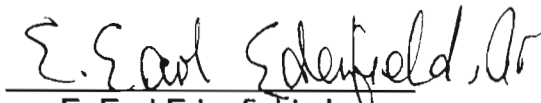
**CERTIFICATE OF SERVICE
DOCKET NO. 030349-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 25th day of July, 2003 to the following:

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E. Earl Edenfield, Jr. (KA)

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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF JOHN A. RUSCILLI
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 030349-TP
JULY 25, 2003

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

A. My name is John A. Ruscilli. I am employed by BellSouth as Senior Director – Policy Implementation and Regulatory Compliance for the nine-state BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. HAVE YOU FILED TESTIMONY PREVIOUSLY IN THIS DOCKET?

A. Yes. I filed direct testimony on June 27, 2003.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to portions of the testimony of Mr. David A. Nilson filed on June 27, 2003 on behalf of Supra Telecommunications and Information Systems, Inc. ("Supra").

1 Q. DO YOU HAVE ANY GENERAL COMMENTS REGARDING MR.
2 NILSON'S TESTIMONY?

3

4 A. Yes. Despite the volumes of testimony and supporting exhibits that Mr. Nilson
5 has filed with the Florida Public Service Commission ("FPSC" or
6 "Commission") in this docket, Mr. Nilson provides no evidence that BellSouth
7 has used carrier-to-carrier or wholesale information to support its retail
8 operations' sales or reacquisition programs. Instead, through thousands of
9 pages of documents, innuendo and mischaracterization of previous testimony
10 provided by BellSouth's witnesses and documents, Supra is attempting to
11 persuade this Commission that BellSouth is somehow guilty of some type of
12 wrongdoing. Supra has failed miserably.

13

14 The reason for this is simple. BellSouth has not and does not use carrier-to-
15 carrier or wholesale information improperly. For instance, it is BellSouth's
16 policy to limit disclosure and the use of CPNI and "wholesale information" in a
17 manner consistent with the requirements of the FCC's rules, Section 222 of the
18 Telecommunications Act of 1996 and any applicable state or local requirement.
19 All employees of BellSouth who may have access to either CPNI or wholesale
20 information receive annual training with respect to the proper and prohibited
21 use of and access to such information. It is against BellSouth's policy for any
22 employee or authorized representative of BellSouth to misuse wholesale
23 information. It is also BellSouth's policy that no BellSouth personnel shall
24 have access to any BellSouth Information Technology ("IT") system unless
25 that person has a legitimate and authorized business purpose for such access.

1 BellSouth adopted all of these policies to ensure that it complies with the
2 various regulatory restrictions on the use of CPNI and carrier-to-carrier
3 information and the Commission approved of these policies and determined
4 that BellSouth “has the appropriate policies in place” in Order No. PSC-03-
5 07260-FOF-TP.

6

7 Q. MR. NILSON TALKS AT LENGTH IN HIS TESTIMONY ABOUT
8 OPERATION SUNRISE. PLEASE PROVIDE A BRIEF DESCRIPTION OF
9 OPERATION SUNRISE.

10

11 A. Operation Sunrise is a computer program whose purpose is to identify, qualify,
12 contact, track and hopefully reacquire former residential customers who have
13 selected a local service or local toll carrier other than BellSouth. Since late
14 2002, BellSouth has also used Operation Sunrise for residential interLATA
15 long distance reacquisition.

16

17 As I discussed in my direct testimony, for the purpose of local service, the
18 information BellSouth’s retail division ultimately receives to target possible
19 reacquisition customers is obtained from the retail customer’s records after the
20 disconnection of the retail customer’s BellSouth local service. When a
21 BellSouth end user’s local service is disconnected, a Disconnect Reason
22 (“DCR”) code is reflected on the disconnect order. Those customers whose
23 records reflect a non-competitive DCR are removed and the remaining
24 customers are assumed to have switched local providers from BellSouth to
25 another carrier. It is this disconnect report, generated after the completion of

1 any disconnect requests, that BellSouth's retail division uses in its reacquisition
2 marketing efforts.

3

4 In gathering this information, Operation Sunrise does not identify the
5 customer's new carrier or the services the customer will receive from the new
6 carrier. Instead, Operation Sunrise uses network information – i.e. the fact that
7 a customer left BellSouth's network and is no longer a BellSouth retail
8 customer (information to which any retail provider of local service is entitled
9 and receives) – and not any information that BellSouth obtained through the
10 provision of telecommunications services to a CLEC to create reacquisition
11 lists.

12

13 Q. IS OPERATION SUNRISE AND THE USE OF DISCONNECT
14 INFORMATION TO TARGET POTENTIAL WINBACK CANDIDATES
15 PERMISSIBLE?

16

17 A. Yes. Programs such as Operation Sunrise, that are used to identify for
18 reacquisition customers that have left BellSouth, are permissible according to
19 both this Commission and the FCC. For example, in its Order PSC-03-0736-
20 FOF-TP (“Order”) in Docket Nos. 020119-TP, 020578-TP and 021252-TP
21 dated June 19, 2003 the Commission relies upon the FCC's findings in FCC
22 Order 99-233 regarding the use of information when it is obtained through its
23 normal channels. The FCC stated, “We clarify that, to the extent that the retail
24 arm of an executing carrier obtains carrier change information through its
25 normal channels in a form available throughout the industry, and after the

1 carrier change has been implemented (such as in disconnect reports), we do not
2 prohibit the use of that information in executing carriers' winback efforts."
3 This reference alone validates both the use of reacquisition programs in general
4 and specifically the use of disconnect information in winback programs by
5 both the FCC and this Commission.

6
7 Like any other provider of local service, BellSouth is entitled to receive notice
8 that service for a particular line has been terminated. This not information of
9 any relevance to BellSouth's wholesale relationship with a CLEC. Rather, it
10 is information notifying retail operations that the network organization is no
11 longer providing service to the retail organization with respect to a specific
12 line. The fact that service has been disconnected is information retail
13 operations can use to reacquire a customer.

14
15 Q. MR. NILSON REFERS ON SEVERAL OCCASIONS TO CPNI AND
16 WHOLESALE INFORMATION. ARE THESE TWO TERMS
17 SYNONYMOUS?

18
19 A. No. Customer Proprietary Network Information or CPNI as defined in Section
20 222(f)(1) of the Telecommunications Act of 1996, means "(A) information that
21 relates to the quantity, technical configuration, type, destination, and amount of
22 use of a telecommunications service subscribed to by any customer of a
23 telecommunications carrier, and that is made available to the carrier by the
24 customer solely by virtue of the carrier-customer relationship; and (B)
25 information contained in the bills pertaining to telephone exchange service or

1 telephone toll service received by a customer of a carrier; except that such term
2 does not include subscriber list information.” Therefore, the phone number
3 and address information of a customer is not CPNI. However, information
4 pertaining to the features the customer has on their line is CPNI.

5
6 Wholesale information, on the other hand, is information that BellSouth has in
7 its possession because it provides services to other carriers that provide
8 services to end user customers. Any such information, whether it constitutes
9 CPNI or not, is not made available to BellSouth’s retail operations. Although
10 BellSouth’s retail operations have access to disconnect information from the
11 BellSouth retail record for use in reacquisition programs, they do not have
12 access to the wholesale information and CPNI that a CLEC might include on a
13 service order issued for the purpose of switching a BellSouth customer to the
14 CLEC.

15

16 Q. PLEASE DISCUSS CPNI AS IT RELATES TO CUSTOMER ACCOUNT
17 RECORD EXCHANGE (“CARE”)?

18

19 A. As Ms. Summers and Mr. Wolfe describe, CARE is the interface that
20 interexchange carriers and local exchange carriers use to communicate and
21 subscribe end users to toll service. Although BellSouth manages CARE, any
22 carrier in BellSouth’s region can subscribe and obtain CARE data. The records
23 that BellSouth and other carriers receive from CARE contain CPNI. However,
24 a carrier may review CPNI relating to its own toll customers. In other words,
25 the reports that a carrier receives from CARE in connection with acquiring or

1 losing a customer involve only that carrier's own just acquired or just departed
2 customer (generally, informing the carrier that the customer has added or
3 disconnected service). The other records that a carrier receives from CARE
4 involve only that carrier's existing customers.

5

6 Q. AT PAGE 17, MR. NILSON REFERENCES ORDER PSC-03-0726-FOF-TP
7 AS SUPPORT THAT BELLSOUTH IS NOT "ALLOWED TO USE
8 WHOLESALE INFORMATION IN WINBACK OF CUSTOMERS LOST
9 FROM ITS RETAIL DIVISION". PLEASE COMMENT.

10

11 A. First, BellSouth does not use wholesale information to reacquire customers that
12 have left BellSouth for another local carrier. The information BellSouth uses
13 for its reacquisition programs is obtained through disconnect information as
14 described above and in my direct testimony. This disconnect information
15 contains only information available from the retail customer's records. It does
16 not contain any information regarding the carrier or the carrier's order that was
17 issued to switch the customer from BellSouth. Accordingly, it does not
18 constitute "wholesale information".

19

20 Second, Mr. Nilson misconstrues the Commission's Order. The section
21 referred to by Mr. Nilson deals specifically with the issue of using wholesale
22 information in retention efforts, not reacquisition efforts as referenced by Mr.
23 Nilson. In addition, please note that Mr. Nilson has taken liberties with the
24 Commission's Order by combining terms used by the Commission with terms
25 used in a quote by the FCC to develop a statement not specifically stated by

1 either the FCC or this Commission. Specifically, Mr. Nilson states, that Order
2 PSC-03-0726-FOF-TP requires that BellSouth “must use commercially
3 available information in a form available throughout the retail industry.” In
4 contrast to Mr. Nilson’s testimony, the Commission actually held on page 45
5 of the Order that “[we] believe that retention marketing is acceptable if the
6 information regarding the customer potentially leaving BellSouth is obtained
7 through *independent retail means*.” (emphasis added) Supra has
8 mischaracterized the Commission’s Order. The Commission did not use the
9 term “commercially available”. Supra’s use of the term “commercially
10 available” implies a requirement to use sources external to BellSouth and
11 available to other parties. This statement is incorrect and mischaracterizes the
12 Commission’s Order.

13

14 To continue, in support of its position as quoted above, the Commission quotes
15 the FCC’s September 3, 1999 Order 99-223 as follows:

16 We agree with SBC and Ameritech that section 222(b) is not violated if
17 the carrier has independently learned from its retail operations that a
18 customer is switching to another carrier; in this case, the carrier is free to
19 use CPNI to persuade the customer to stay, consistent with the limitations
20 set forth in the preceding section. We thus distinguish between the
21 “wholesale” and the “retail” services of a carrier. If the information
22 about a customer switch were to come through independent retail means,
23 then a carrier would be free to launch a “retention” campaign under the
24 implied consent conferred by section 222(c)(1). (¶ 78).

25

1 In its concluding paragraph of Order PSC-03-0726-FOF-TP, this Commission
2 states “We have examined BellSouth’s policies concerning CPNI and use of
3 wholesale information, and are satisfied that BellSouth has the appropriate
4 policies in place.” Nothing has changed in BellSouth’s policies or practices
5 that would call into question BellSouth’s compliance with the appropriate use
6 of CPNI and wholesale information. Further, nothing in Mr. Nilson’s
7 testimony or accompanying documentation supports the reopening of this
8 issue.

9
10 Q. PLEASE RESPOND TO MR. NILSON’S ALLEGATION ON PAGE 22 IN
11 WHICH HE ASSERTS THAT BELL SOUTH USES SUPRA LOCAL
12 SERVICE REQUESTS (“LSRs”) TO RECEIVE A FIRM ORDER
13 CONFIRMATION (“FOC”) TO TRIGGER ITS MARKETING
14 DEPARTMENT ON A PARTICULAR NUMBER.

15
16 A. As explained in greater detail by Mr. Pate, the FOC provides the CLEC with
17 the information required for control and tracking of the request(s) for the
18 provisioning of local service. It is returned to the CLEC either via facsimile or
19 electronically after it is determined that the submitted LSR information is
20 correct to allow creation of a service order for processing. FOC information is
21 provided to the requesting CLEC. The FOC is not provided to any BellSouth
22 retail operation, either electronically or manually and is not used to trigger
23 marketing activities. Therefore, contrary to Mr. Nilson’s statements,
24 BellSouth’s FOC process does not allow for the sharing of information
25 between BellSouth’s retail and wholesale operations or otherwise violate any

1 undefined "CPNI law" as alleged by Mr. Nilson.

2

3 It is important to note that, when transmitted electronically, the FOC is
4 returned to the CLEC over the same interface that the CLEC used to transmit
5 the order, i.e. EDI, LENS, TAG, etc. These interfaces are used specifically and
6 only by CLECs. BellSouth's marketing department does not have access to
7 these interfaces. If the FOC is returned to the CLEC via facsimile, it is
8 transmitted only to the CLEC initiating the service order.

9

10 Q. ON PAGE 25 AND 26 OF HIS TESTIMONY, MR. NILSON TALKS
11 ABOUT A LETTER HE RECEIVED FROM BELLSOUTH ON TWO
12 OCCASIONS THIS YEAR. MR. NILSON IMPLIES THAT BELLSOUTH
13 VIOLATED COMMISSION OR FCC RULES IN ISSUING THIS LETTER.
14 PLEASE ADDRESS THIS LETTER (EXHIBIT DAN2) AND MR.
15 NILSON'S ERRONEOUS CONTENTIONS.

16

17 A. Without addressing the specifics of the situation that may have prompted this
18 letter to be sent to Mr. Nilson, I wish to highlight certain information that Mr.
19 Nilson has failed to point out. Clearly the letter is designed to notify Mr.
20 Nilson that, as a result of some recent change in his telephone service, he may
21 be in need of new telephone directories. The letter simply advises him of a
22 toll-free number, along with an order number and pin number that can be used
23 to order directories through an automated system. Upon calling the toll-free
24 number it becomes clearly evident that the automated system deals only with
25 directory orders. Mr. Nilson's allegation that the order number and PIN

1 number “would enable the customer to easily convert back to BellSouth, and
2 change line features at the same time.” is completely false. Had Mr. Nilson
3 called the toll-free number, as I did, he would have realized this fact. Further,
4 the letter was sent by BellSouth Advertising and Publishing Corporation
5 (“BAPCO”), not BellSouth’s retail operations. BAPCO rightly does not
6 distinguish between BellSouth customers and CLEC customers when sending
7 out these notification letters. Because BAPCO gets notification of service
8 orders for both BellSouth and CLEC customers that are not true new connects,
9 these customers may or may not need directories. BAPCO simply wants to
10 ensure that all customers have access to the directories to which they are
11 entitled.

12

13 Q. MR. NILSON ALSO MENTIONS A LETTER (EXHIBIT DAN3) ON PAGE
14 25 OF THIS TESTIMONY. ALTHOUGH NOT SPECIFICALLY STATED,
15 IT APPEARS THAT MR. NILSON IS USING THIS LETTER AS AN
16 EXAMPLE OF IMPROPER NOTIFICATION TO BELLSOUTH RETAIL
17 OPERATIONS OF A DISCONNECTED CUSTOMER. CAN YOU
18 COMMENT ON MR. NILSON’S STATEMENTS AND INNUENDOS?

19

20 A. The letter attached to Mr. Nilson’s testimony as Exhibit DAN3 asks the
21 customer to consider having BellSouth provide their local service by stating
22 “we want to serve you as our customer” and offering the advantages of
23 BellSouth’s Complete Choice® plan. This letter is typical of an effort by
24 BellSouth’s retail operations to reacquire a customer that has left BellSouth for
25 another local carrier. There is nothing improper about the letter that Mr.

1 Nilson has attached to his testimony. In fact, it is evident that information is
2 properly flowing from SOCS to initiate disconnection of the customer from
3 BellSouth's retail operations when the customer leaves BellSouth for another
4 local carrier.

5
6 Q. MR. NILSON ALSO ATTACHES A LETTER AS EXHIBIT DAN4 IN AN
7 ATTEMPT TO ATTRIBUTE SOME IMPROPER ACTIVITY TO
8 BELLSOUTH. PLEASE COMMENT ON THIS LETTER.

9
10 A. Mr. Nilson's Exhibit DAN4 is a copy of a letter sent to a customer that, at
11 some point in the past, was a BellSouth local service customer. The letter
12 introduces BellSouth Unlimited Answers PlanSM. Mr. Nilson makes an
13 assumption that the letter was initiated because BellSouth improperly used
14 wholesale information. Specifically, Mr. Nilson states, "[t]he only way for
15 BellSouth to know which lines are still in service is to broach the
16 retail/wholesale barrier and freely exchange information." He appears to
17 assume that simply because BellSouth sent a letter to a Supra customer that has
18 had no activity on their line for, according to Mr. Nilson, 619 days, that
19 BellSouth illegally obtained customer information. Mr. Nilson has made a
20 leap that has no basis in reality. When a customer leaves BellSouth, the
21 competitive disconnect information that I discussed in my direct testimony is
22 used to identify the customer for reacquisition efforts. If the customer does not
23 respond to the reacquisition effort, their data is recycled for future contacts.
24 The customer may receive additional offers to return to BellSouth over a
25 period of months or even years. In fact, BellSouth continues to contact

1 assumed competitive disconnects as far back as 2001. Thus it is not unrealistic
2 for former BellSouth customers that left several years ago to be the subject of
3 reacquisition efforts. Importantly, even in these subsequent contacts,
4 BellSouth only uses information originally obtained from the former retail
5 customer's records after disconnection of BellSouth's local service. Again,
6 there is nothing in Exhibit DAN4 that indicates that BellSouth has obtained
7 and/or used wholesale or carrier-to-carrier information in generating the letter
8 or targeting potential BellSouth customers.

9
10 Q. AT PAGE 31, MR. NILSON STATES THAT CLECS SHOULD HAVE
11 "UNBUNDLED ACCESS TO ANY OF THE OPERATION SUNRISE
12 DATABASE, OR RECEIVE A FEED OF THE DISCONNECT DATA USED
13 FOR WINBACK". DO YOU AGREE?

14
15 A. Absolutely not. There is no legitimate reason for CLECs to have access to the
16 Operation Sunrise database. The same information is available for CLECs in
17 the CLEC Line Loss Notification reports that are made available via the
18 Performance Measurement and Analysis Platform ("PMAP"). The Line Loss
19 Notification reports provide notification to CLECs that they have lost an entire
20 account or portion of an account. The reports contain a Disconnect Reason
21 code for each account providing an indication to the losing carrier of the reason
22 for the disconnect or partial disconnect. The Line Loss Notification reports
23 posts daily, except Sunday, to the CLECs' individual Internet web pages and
24 contain only the individual CLEC's accounts. As an example, I have attached
25 Exhibit JAR-1 to my rebuttal testimony, which is the Line Loss Notification

1 Report for Supra's OCN 7012, dated July 23, 2003. This exhibit clearly
2 demonstrates that timely line loss data is provided to Supra by disconnect
3 reason.

4
5 The disconnect information used to create the Line Loss Notification reports
6 comes from SOCS. As noted earlier, SOCS is also the source of the
7 disconnect information on BellSouth's retail customers that is provided via
8 data feed to Operation Sunrise. Thus, when a Supra customer leaves Supra for
9 another local provider, Supra has access to the same disconnect information
10 via its Line Loss Notification reports that is organized and made available in
11 the Sunrise database for BellSouth's own customers. BellSouth no more has
12 an obligation to provide its disconnect information to Supra than Supra has to
13 provide its disconnect information to BellSouth.

14
15 Q. MR. NILSON DESCRIBES THE PENALTIES THAT THE COMMISSION
16 SHOULD IMPOSE UPON BELL SOUTH FOR "VIOLATING ISSUE #1
17 AND #2. PLEASE COMMENT.

18
19 A. As an initial matter, BellSouth has demonstrated that it does not share or use
20 carrier-to-carrier information acquired from its wholesale operations, with its
21 retail operations or with third party marketers. Therefore, penalties are not
22 appropriate. With regard to the six penalties listed at pages 32-33 of Mr.
23 Nilson's testimony, I respond briefly to each below. Supra's paraphrased
24 penalty statements are shown in italics.

25

1 1. *\$25K per day that violation has occurred.*

2 Although Florida statutes allow for a \$25K fine per day per violation, it must
3 be shown that BellSouth has violated the rules or orders of the Commission
4 before the Commission could consider imposing such a penalty. Through the
5 testimony provided by BellSouth's witnesses, it is clear that BellSouth is not
6 violating any rules or orders with respect to the sharing of wholesale
7 information.

8

9 2. *Suspension of certificate.*

10 Suspension of a certificate is a last resort option that should not even be
11 considered as a remedy in this case, especially since there is absolutely no
12 evidence that BellSouth is in violation of any FCC or Commission rules
13 relating to wholesale or carrier-to-carrier information.

14

15 3. *Dismantle the Harmonize feed/or order that BST provide direct access to*
16 *the Harmonize feed so the CLEC can send the letter of acknowledgement.*

17 As described in the testimony of Ms. Summers and Mr. Wolfe, the Harmonize
18 feed (data feed that provides disconnect information from SOCS to Operation
19 Sunrise) does not provide wholesale information to BellSouth's retail
20 operations. Dismantling the Harmonize feed would be to BellSouth what
21 dismantling the Line Loss Notification reports would be to CLECs. When
22 Supra loses a customer, the Line Loss Notification report provides information
23 for Supra to send out its own acknowledgement or winback letter, as it sees fit.
24 BellSouth should not be required to either dismantle the Harmonize feed or to
25 provide access to CLECs.

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4. *Require BST to print a date on its letters showing when the letter was mailed.*

Although it would be possible to date the winback letter, it is not necessary. In its Order PSC-03-0726-FOF-TP, the Commission acknowledged BellSouth’s voluntary 10-day waiting period before BellSouth can initiate winback activity. The 10-day waiting period is sufficient to ensure that there is no issue with BellSouth initiating winback activity prior to the completion of a disconnect of BellSouth’s service. Further, because winback candidates are identified through the completion of the disconnect order, BellSouth is ensuring that its winback efforts are above reproach.

5. *Prohibit a letter of any sort from being sent to customers for 90 days.*

The Commission has already rejected the 30-day waiting period proposed by Florida Digital Network (“FDN”) in its Order PSC-03-0726-FOF-TP. The Commission stated, “[w]e disagree with FDN witness Gallagher that a 10-day waiting period is not enough.” Supra has not provided any evidence to demonstrate to the Commission why it should expand the 10-day waiting period to 30 days, much less 90 days. Further, the Commission has stated that winback promotions can be very beneficial to Florida consumers by providing a choice of carriers at competitive prices. The FCC has also noted that winback offers can promote competition, which is in the best interest of the customer, and can result in lower prices to consumers.

1 6. *Require an OSS expert, chosen by Supra and paid for by BellSouth, to*
2 *examine BellSouth's system twice a year at random. This expert will report*
3 *back to see if BellSouth is still utilizing this Harmonize feed or some other*
4 *similar system.*

5 First, it appears that this “expert” would only be required if, as a result of this
6 proceeding, the Commission determines that BellSouth should dismantle the
7 Harmonize feed. Because BellSouth has demonstrated that the disconnect data
8 that BellSouth’s retail operations receives as a result of the Harmonize feed is
9 the same information that the Line Loss Notification reports provide to
10 CLECs, the Harmonize feed does not violate any order or rule of the
11 Commission. Second, Supra’s penalty assumes that BellSouth would
12 knowingly and willingly violate an order of this Commission, and therefore,
13 require a watchdog in the form of a Supra “expert” to keep BellSouth honest.
14 BellSouth has not and would not knowingly violate any order of this
15 Commission and BellSouth takes exception to Supra challenging BellSouth’s
16 honesty and integrity.

17

18 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

19

20 A. Yes.

21

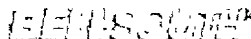
22 #497864

23

24

25

Performance Measurement and Analysis Platform



Performance Measurement and Analysis Platform

Home Switchboard Logout Account Mgmt Feedback Exhibits Help

Line Loss Notification

Home > Switchboard > Operations > Line Loss

Excel

OCN: 7012 ■

Report Run Date: 7/23/2003 5:17:06 PM

Information on this report remains for 7 calendar days before being removed.

Dear Customer:

BellSouth has received a request to establish local service at an address where currently you have an account(s) or line(s) working. The parties requesting local service at these addresses deny all knowledge of the current account(s) or line(s) and claim the service is an **Abandon Station**. A service order has been issued for the date below to disconnect your account(s). BellSouth is providing this notification as a courtesy to you.

CLEC Loss Notification Report: Full Account

Telephone #	Name	Completion Date
305 626-	[REDACTED]	7/22/2003
305 445-	[REDACTED]	7/21/2003
561 964-	[REDACTED]	7/21/2003
954 436-	[REDACTED]	7/21/2003
954 596-	[REDACTED]	7/17/2003
954 255-	[REDACTED]	7/16/2003
954 752-	[REDACTED]	7/16/2003
561 740-	[REDACTED]	7/15/2003
904 272-	[REDACTED]	7/15/2003
904 724-	[REDACTED]	7/15/2003
954 340-	[REDACTED]	7/15/2003
954 455-	[REDACTED]	7/15/2003

Dear Customer:

Bellsouth has received a **request to transfer** local service for the following account number(s) or line(s) from an account to another service provider. The service(s) were transferred on the date indicated below. BellSouth is providing this notification as a courtesy to you.

CLEC Loss Notification Report: Full Account

Telephone #	Name	Completion Date
305 759-	[REDACTED]	7/22/2003
305 940-	[REDACTED]	7/22/2003
305 940-	[REDACTED]	7/22/2003
305 940-	[REDACTED]	7/22/2003
305 940-	[REDACTED]	7/22/2003
305 944-	[REDACTED]	7/22/2003
305 944-	[REDACTED]	7/22/2003
305 944-	[REDACTED]	7/22/2003
305 944-	[REDACTED]	7/22/2003
305 944-	[REDACTED]	7/22/2003
305 945-	[REDACTED]	7/22/2003

Performance Measurement and Analysis Platform

305 945- [REDACTED]	7/22/2003
305 945- [REDACTED]	7/22/2003
305 947- [REDACTED]	7/22/2003
305 947- [REDACTED]	7/22/2003
305 947- [REDACTED]	7/22/2003
305 948- [REDACTED]	7/22/2003
305 949- [REDACTED]	7/22/2003
305 949- [REDACTED]	7/22/2003
352 332- [REDACTED]	7/22/2003
561 964- [REDACTED]	7/22/2003
561 967- [REDACTED]	7/22/2003
561 996- [REDACTED]	7/22/2003
954 433- [REDACTED]	7/22/2003
954 454- [REDACTED]	7/22/2003
954 726- [REDACTED]	7/22/2003
954 739- [REDACTED]	7/22/2003
305 471- [REDACTED]	7/21/2003
305 628- [REDACTED]	7/21/2003
305 885- [REDACTED]	7/21/2003
305 885- [REDACTED]	7/21/2003
305 887- [REDACTED]	7/21/2003
305 888- [REDACTED]	7/21/2003
305 893- [REDACTED]	7/21/2003
305 893- [REDACTED]	7/21/2003
305 895- [REDACTED]	7/21/2003
305 918- [REDACTED]	7/21/2003
305 919- [REDACTED]	7/21/2003
305 919- [REDACTED]	7/21/2003
305 919- [REDACTED]	7/21/2003
305 932- [REDACTED]	7/21/2003
305 932- [REDACTED]	7/21/2003
305 932- [REDACTED]	7/21/2003
305 933- [REDACTED]	7/21/2003
305 936- [REDACTED]	7/21/2003
305 937- [REDACTED]	7/21/2003
561 865- [REDACTED]	7/21/2003
561 992- [REDACTED]	7/21/2003
904 221- [REDACTED]	7/21/2003
954 442- [REDACTED]	7/21/2003
954 971- [REDACTED]	7/21/2003
305 620- [REDACTED]	7/19/2003
305 556- [REDACTED]	7/18/2003
305 662- [REDACTED]	7/18/2003
954 432- [REDACTED]	7/18/2003
954 739- [REDACTED]	7/18/2003
954 786- [REDACTED]	7/18/2003
954 791- [REDACTED]	7/18/2003
305 238- [REDACTED]	7/17/2003
305 294- [REDACTED]	7/17/2003
305 551- [REDACTED]	7/17/2003
305 754- [REDACTED]	7/17/2003
305 883- [REDACTED]	7/17/2003
561 712- [REDACTED]	7/17/2003
561 737- [REDACTED]	7/17/2003
954 255- [REDACTED]	7/17/2003
954 370- [REDACTED]	7/17/2003
954 731- [REDACTED]	7/17/2003
954 772- [REDACTED]	7/17/2003
954 942- [REDACTED]	7/17/2003
954 967- [REDACTED]	7/17/2003
305 207- [REDACTED]	7/16/2003

Performance Measurement and Analysis Platform

305 442- [REDACTED]	7/16/2003
305 545- [REDACTED]	7/16/2003
305 627- [REDACTED]	7/16/2003
305 691- [REDACTED]	7/16/2003
305 759- [REDACTED]	7/16/2003
305 944- [REDACTED]	7/16/2003
561 482- [REDACTED]	7/16/2003
904 491- [REDACTED]	7/16/2003
954 321- [REDACTED]	7/16/2003
954 382- [REDACTED]	7/16/2003
954 438- [REDACTED]	7/16/2003
954 575- [REDACTED]	7/16/2003
954 722- [REDACTED]	7/16/2003
954 755- [REDACTED]	7/16/2003
954 894- [REDACTED]	7/16/2003
954 915- [REDACTED]	7/16/2003
954 979- [REDACTED]	7/16/2003
954 987- [REDACTED]	7/16/2003
305 258- [REDACTED]	7/15/2003
305 285- [REDACTED]	7/15/2003
305 669- [REDACTED]	7/15/2003
305 688- [REDACTED]	7/15/2003
305 829- [REDACTED]	7/15/2003
561 477- [REDACTED]	7/15/2003
561 498- [REDACTED]	7/15/2003
954 344- [REDACTED]	7/15/2003
954 433- [REDACTED]	7/15/2003
954 454- [REDACTED]	7/15/2003
954 567- [REDACTED]	7/15/2003
954 597- [REDACTED]	7/15/2003
954 755- [REDACTED]	7/15/2003

Dear Customer,

Bellsouth has received notification that the following account(s) or line(s) were transferred to you in error. Consequently, effective on the date indicated below, the account(s) or line(s) have been reestablished with the previous service provider.

CLEC Loss Notification Report: Full Account

<u>Telephone #</u>	<u>Name</u>	<u>Completion Date</u>
561 547- [REDACTED]	[REDACTED]	7/15/2003
561 752- [REDACTED]	[REDACTED]	7/15/2003

Dear Customer,

BellSouth is providing a list of your accounts that were disconnected for reasons other than those indicated above. This may include requests that were completed at your request. BellSouth is providing this information as a courtesy to you.

CLEC Loss Notification Report: Full Account

<u>Telephone #</u>	<u>Name</u>	<u>Completion Date</u>
954 349- [REDACTED]	[REDACTED]	7/22/2003
954 351- [REDACTED]	[REDACTED]	7/22/2003
954 454- [REDACTED]	[REDACTED]	7/22/2003

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954 578- [REDACTED]	[REDACTED]	7/22/2003
305 274- [REDACTED]	[REDACTED]	7/21/2003
305 937- [REDACTED]	[REDACTED]	7/21/2003
954 454- [REDACTED]	[REDACTED]	7/21/2003
954 772- [REDACTED]	[REDACTED]	7/21/2003
305 324- [REDACTED]	[REDACTED]	7/20/2003
954 316- [REDACTED]	[REDACTED]	7/20/2003
305 382- [REDACTED]	[REDACTED]	7/19/2003
954 442- [REDACTED]	[REDACTED]	7/19/2003
954 920- [REDACTED]	[REDACTED]	7/19/2003
954 966- [REDACTED]	[REDACTED]	7/19/2003
954 419- [REDACTED]	[REDACTED]	7/18/2003
954 971- [REDACTED]	[REDACTED]	7/18/2003
305 981- [REDACTED]	[REDACTED]	7/17/2003
561 865- [REDACTED]	[REDACTED]	7/17/2003
305 969- [REDACTED]	[REDACTED]	7/16/2003
786 845- [REDACTED]	[REDACTED]	7/16/2003
305 685- [REDACTED]	[REDACTED]	7/15/2003

>> End of Data

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