

ORIGINAL

Legal Department

E. EARL EDENFIELD, JR.  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0763

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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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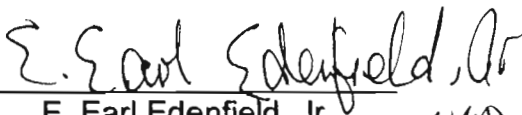
**CERTIFICATE OF SERVICE  
DOCKET NO. 030349-TP**

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:

Linda Dodson  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
[ldodson@psc.state.fl.us](mailto:ldodson@psc.state.fl.us)

Adenet Medacier, Esq.  
Jorge L. Cruz-Bustillo, Esq,  
Legal Department  
Supra Telecommunications and  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133  
Tel. No. (305) 476-4240  
Fax. No. (305) 443-9516  
[amedacier@stis.com](mailto:amedacier@stis.com)  
[jorge.cruz-bustillo@stis.com](mailto:jorge.cruz-bustillo@stis.com)

Ann Shelfer, Esq.  
Supra Telecommunications and  
Information Systems, Inc.  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[ashelfer@stis.com](mailto:ashelfer@stis.com)

  
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E. Earl Edenfield, Jr. (KA)

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BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL PANEL TESTIMONY OF  
MICHELLE N. SUMMERS AND EDWARD WOLFE  
FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 030349-TP  
JULY 25, 2003

Q. MS. SUMMERS, PLEASE STATE YOUR FULL NAME AND ADDRESS.

A. Michelle N. Summers, 2180 Lenox Park, Atlanta, Georgia 30319

Q. WHO IS YOUR EMPLOYER?

A. BellSouth Technologies Group, Inc., an affiliate of BellSouth  
Telecommunications, Inc. (collectively, "BellSouth").

Q. WHAT IS YOUR POSITION WITH BELLSOUTH, AND WHAT ARE  
YOUR JOB DUTIES?

A. My present position is director in the Customer Markets Chief Information  
Office. But from June 1998, to August 2002, I was a director in the Marketing  
Information Support ("MKIS") organization. In that position, I had certain  
responsibilities relating to Operation Sunrise, although I was not responsible  
for Operation Sunrise in its totality. My role with respect to Operation Sunrise  
involved various marketing support functions, including (1) the generation of

1 lists of existing and former BellSouth retail customers for various reacquisition  
2 campaigns; (2) the management of such lists; and (3) the storing of data for  
3 various marketing campaigns.

4  
5 My position with MKIS also involved a function -- namely, management  
6 reporting -- that has nothing to do with Operation Sunrise or the reacquisition  
7 of customers. This management reporting function of my position involved  
8 reporting on retail line loss, reporting on the ordering and cancellation of  
9 various features and services, and other activities relating to measuring  
10 BellSouth's retail sales performance.

11  
12 Q. MR. WOLFE, PLEASE STATE YOUR FULL NAME AND ADDRESS.

13  
14 A. Edward Wolfe, 3535 Colonnade Parkway, Birmingham, Alabama 35243.

15  
16 Q. WHO IS YOUR EMPLOYER?

17  
18 A. BellSouth Technologies Group, Inc., an affiliate of BellSouth  
19 Telecommunications, Inc. (collectively, "BellSouth")

20  
21 Q. WHAT IS YOUR POSITION WITH BELLSOUTH, AND WHAT ARE  
22 YOUR JOB DUTIES?

23  
24 A. I am Marketing Operations Manager in the MKIS Delivery organization. In  
25 this position I manage the group that generates and delivers most of the

1 marketing lead lists for the BellSouth residential business unit; this would  
2 include lead lists from Operation Sunrise. This group also provides tracking  
3 and reporting for some BellSouth residential business unit promotional  
4 activities.

5

6 **Q.** MS. SUMMERS, YOU HAVE READ MR. NILSON'S TESTIMONY THAT  
7 MKIS IS A SYSTEM (P. 16, LL. 2-5) AND THAT YOU ARE  
8 RESPONSIBLE FOR MANAGING IT. IS THAT CORRECT?

9

10 **A.** No.

11

12 **Q.** THEN WHAT IS MKIS, EXACTLY, MS. SUMMERS?

13

14 **A.** MKIS is an organization within BellSouth that supports the Marketing  
15 organization by providing various statistics and information about the sales  
16 performance of various BellSouth retail products and services. MKIS tracks  
17 information such as retail line loss, the ordering and cancellation by BellSouth  
18 retail customers of various products and services, and numerous other retail  
19 data that assist the Marketing organization in creating products and services  
20 that appeal to customers. In connection with Operation Sunrise, MKIS's role  
21 was to provide marketing support in terms of list management and distribution  
22 for target marketing.

23

24 **Q.** MS. SUMMERS, WHAT IS OPERATION SUNRISE?

25

1 A. Operation Sunrise, or Sunrise, is a program of activities that was developed by  
2 consumer marketing to address three specific areas: (1) retail residential local  
3 service reacquisition; (2) residential local toll reacquisition; and (3) retail  
4 residential product or feature reacquisition. Since the fall of 2002, BellSouth  
5 has also used Operation Sunrise in a fourth area -- residential interLATA long  
6 distance reacquisition. This fourth aspect of Sunrise, which has largely  
7 replaced the local toll reacquisition aspect mentioned above, is designed to  
8 reacquire those residential end users who have changed their interLATA long  
9 distance service from BellSouth Long Distance, Inc. ("BSLD") to another inter-  
10 exchange carrier ("IXC"). BellSouth uses Sunrise in the reacquisition of only  
11 those former BSLD interLATA toll customers who are also BellSouth local  
12 service customers. BellSouth does not engage in reacquisition activity with  
13 respect to former BSLD customers who do not obtain local telephone service  
14 from BellSouth.

15  
16 Q. MR. WOLFE, PLEASE DESCRIBE THE FUNCTION OF THE LOCAL  
17 SERVICE REACQUISITION COMPONENT OF OPERATION SUNRISE.

18  
19 A. When an end user's local service is disconnected from BellSouth for any  
20 reason, a disconnect or change order is generated. In the case of a CLEC  
21 converting a BellSouth retail customer to the CLEC, the disconnect or change  
22 order originates from the CLEC's Local Service Request ("LSR"), which is sent  
23 to BellSouth either manually or electronically. In the case of a BellSouth retail  
24 customer calling to disconnect his or her service, an abandoned station, a retail  
25 customer's nonpayment of his account, or numerous other reasons, the

1 disconnect order originates from BellSouth's retail operations. In either case, a  
2 specialized reason code is assigned to each order.

3  
4 For an LSR sent by a CLEC, the disconnect or change order and the  
5 appropriate disconnect reason code are generated electronically by BellSouth's  
6 OSS or generated by the LCSC if the CLEC has sent the LSR manually. For a  
7 retail customer who has called BellSouth to disconnect service, the reason code  
8 is assigned by the retail customer service agent who handles the call.

9 Regardless of origin, this reason code indicates why the disconnection  
10 occurred, if known. All "disconnect" orders and certain "new," "change," and  
11 "transfer" orders flow nightly into the Harmonize database on the Strategic  
12 Information Warehouse ("SIW"), a data warehouse, via a data feed called the  
13 Harmonize feed, which is sourced from SOCS data. The local service  
14 reacquisition function of Sunrise processes data from the Harmonize database  
15 on a weekly basis in a manner that filters out any information that could even  
16 arguably be considered CPNI or wholesale information.

17  
18 Q. MS. SUMMERS, MR. NILSON TESTIFIED THAT "[F]OR LOCAL  
19 SERVICE, THE ONLY INFORMATION THAT EXISTS IS THE ALEC'S  
20 LSR INITIATING SERVICE." (P. 21, LL. 30-31). IS THAT CORRECT?

21  
22 A. No. For BellSouth retail customers whose service a CLEC converts to itself,  
23 the disconnect or change orders are generated as a result of a CLEC submitting  
24 an LSR. But disconnect orders also come from BellSouth's retail operations.  
25 For instance, a disconnect order that results from a BellSouth retail customer

1 calling BellSouth to disconnect his service because he is moving would come  
2 from BellSouth's retail operations. Likewise, a disconnect order that results  
3 from a BellSouth retail customer calling BellSouth to disconnect his service to  
4 switch to a competitor would come from BellSouth's retail operations.

5

6 Q. YOU MENTIONED THE SIW, MS. SUMMERS. IS SIW ANOTHER  
7 NAME FOR OPERATION SUNRISE, AS MR. NILSON SUGGESTS IN HIS  
8 TESTIMONY (P. 15, LL. 10-11)?

9

10 A. No. The SIW is a vast computer data warehouse in which reside all kinds of  
11 information. Much of this information has nothing to do with Operation  
12 Sunrise or with reacquisition, or even with marketing in general. Different  
13 organizations within BellSouth use different information from the SIW for  
14 different purposes. Importantly, however, the information is  
15 compartmentalized. By that, I mean that each organization can only access the  
16 information for which that organization has been authorized. The SIW is so-  
17 designed because it was more economical for the business units to share this  
18 system resource than to have numerous stand alone systems. But because, as  
19 part of this sharing, retail and wholesale data occupy the same system,  
20 compartmentalization was implemented to prevent each unit from accessing  
21 the other unit's data. Thus, for example, although MKIS has log-on access to  
22 information in the SIW provided to MKIS, such as the Sunrise data, MKIS  
23 does not have access to information provided to other organizations within  
24 BellSouth.

25



1 Q. MS. SUMMERS, MR. NILSON HAS TESTIFIED THAT BELLSOUTH  
2 POPULATES THE SIW USED BY MKIS NOT ONLY WITH DATA FROM  
3 SOCS VIA THE HARMONIZE FEED, BUT ALSO WITH DATA FROM  
4 CRIS, WHICH CONTAINS CPNI RELATING TO SUPRA'S CUSTOMERS  
5 (P. 26, LL. 17-21; P. 27, LL. 17-18). IS THAT CORRECT?  
6

7 A. Literally, yes, but his testimony on that point is misleading. MKIS does not  
8 have access, via the SIW or any other means, to any Supra customer  
9 information.<sup>1</sup> The SIW does, however, contain information relating to Supra's  
10 customers. Information relating to Supra customers resides in the part of the  
11 SIW that is accessible to BellSouth's Interconnection Services ("ICS")  
12 organization and is used by ICS in connection with BellSouth's provision of  
13 wholesale service to Supra. But that information is in an entirely different part  
14 of the SIW to which MKIS does not have access. Again, the SIW is a large  
15 data warehouse used by different organizations within BellSouth for different  
16 purposes. And as I testified earlier, the SIW is compartmentalized -- one  
17 BellSouth organization, such as MKIS, cannot access data belonging to another  
18 BellSouth organization, such as ICS, even though both sets of data reside on  
19 the SIW. Consequently, although information relating to Supra's customers  
20 resides in the SIW, MKIS does not have access to that data.  
21

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<sup>1</sup> Two employees in the MKIS organization have limited access to certain wholesale information for purposes of generating a specific monthly report regarding end user migration on an aggregate, system wide level. This report has nothing to do with Operation Sunrise and is not used in connection with any reacquisition activities.

1 Q. MS. SUMMERS, DOES OPERATION SUNRISE TARGET A FORMER  
2 CUSTOMER FOR LOCAL SERVICE REACQUISITION WHILE THAT  
3 CUSTOMER'S CONVERSION FROM BELLSOUTH TO A CLEC IS STILL  
4 UNDERWAY?

5  
6 A. No. Operation Sunrise only tracks disconnect orders that have been completed,  
7 that is, orders in which the service has actually been disconnected. The system  
8 excludes disconnect orders that have not been completed. Thus, a former  
9 BellSouth local service customer who has switched to a CLEC would not  
10 receive any reacquisition marketing piece as part of Operation Sunrise while  
11 his or her switch to the CLEC was still in process.

12  
13 Q. MR. WOLFE, ON PAGES 22-23 OF HIS TESTIMONY, THROUGH A  
14 DISCUSSION OF NEW ("N"), DISCONNECT ("D") AND CHANGE ("C")  
15 ORDERS, MR. NILSON SUGGESTS THAT BELLSOUTH USES SUPRA  
16 CPNI IN ITS REACQUISITION ACTIVITIES. IS THAT CORRECT?

17  
18 A. No. BellSouth's retail operations do not use CLEC LSRs to obtain customer  
19 information, nor do they use any CLEC CPNI. BellSouth's retail operations  
20 use only the completed local service disconnect orders (D or C orders with  
21 disconnect reason codes) of their retail customers (from SOCS via the  
22 Harmonize feed as described above) in retail reacquisition activities.

23  
24 Q. DOES OPERATION SUNRISE TRACK WHETHER A DISCONNECT  
25 ORDER ORIGINATED FROM A CLEC, MR. WOLFE?

1

2 A. No. In processing the disconnect orders weekly, Operation Sunrise does not  
3 track whether the disconnect originated from a CLEC or from the retail  
4 operations. Rather, Operation Sunrise "identifies" competitive disconnects  
5 using a deductive process. Using the Harmonize feed, Sunrise eliminates those  
6 orders for which certain BellSouth retail reason codes exist that indicate that  
7 the disconnection occurred for some reason other than a switch to a competing  
8 carrier. It assumes that the remaining orders represent customers switching to  
9 other carriers; BellSouth chooses to regard all such losses as losses to  
10 competitors. Before any reacquisition list is generated using these "assumed"  
11 competitive disconnects, the actual reason codes, regardless of origin, are  
12 suppressed. Through this deductive process, BellSouth's retail marketing  
13 organization receives exactly the same information any carrier receives:  
14 information that a retail customer has been lost. In addition, it is my  
15 understanding that each CLEC receives this type of information through a  
16 competitive line loss report from BellSouth's interconnection services  
17 organization. Mr. Ruscilli will offer testimony on this point.

18

19 **Q.** MR. WOLFE, PLEASE DESCRIBE IN DETAIL HOW THIS DEDUCTIVE  
20 PROCESS WORKS.

21

22 A. Certainly. It may help you to follow along in the chart I have prepared below  
23 as I describe this process. SOCS is a BellSouth system that processes all retail  
24 and wholesale service orders. When a CLEC submits an LSR to convert a  
25 BellSouth retail customer's local service to that CLEC, an order flows into

1 SOCS. Likewise, when a BellSouth retail customer calls BellSouth to  
2 disconnect service, the resulting order flows into SOCS. Numerous other  
3 transactions relating to BellSouth wholesale and retail access lines also  
4 generate orders; these orders have nothing to do with disconnection of service,  
5 but they flow into SOCS too. Each order contains an array of information  
6 about the end user account to which it pertains.

7  
8 Each night, SOCS creates an extract file of all orders from the preceding 24-  
9 hour period. The extract file is posted to a mainframe repository, which resides  
10 in a computer environment separate from the SIW. And each night, using the  
11 Harmonize feed, various types of orders – including retail and wholesale  
12 disconnect orders and orders of other types -- are harvested from this extract  
13 file and downloaded into a database on the SIW called the Harmonize  
14 database. The Harmonize database is separate from the Sunrise database on  
15 the SIW.

16  
17 Once each week, Operation Sunrise downloads from the Harmonize database  
18 all of the completed residential orders from the preceding seven days into a  
19 temporary table. If an order has not completed or is not associated with a  
20 residential account, Sunrise does not download it into the temporary table.  
21 Next, Sunrise eliminates all orders except D and C orders. At this point, the  
22 temporary table contains all orders in SOCS from the previous seven days that  
23 involve completed disconnections of residential retail service – both CLEC-  
24 initiated disconnections and those initiated by BellSouth's retail operations.

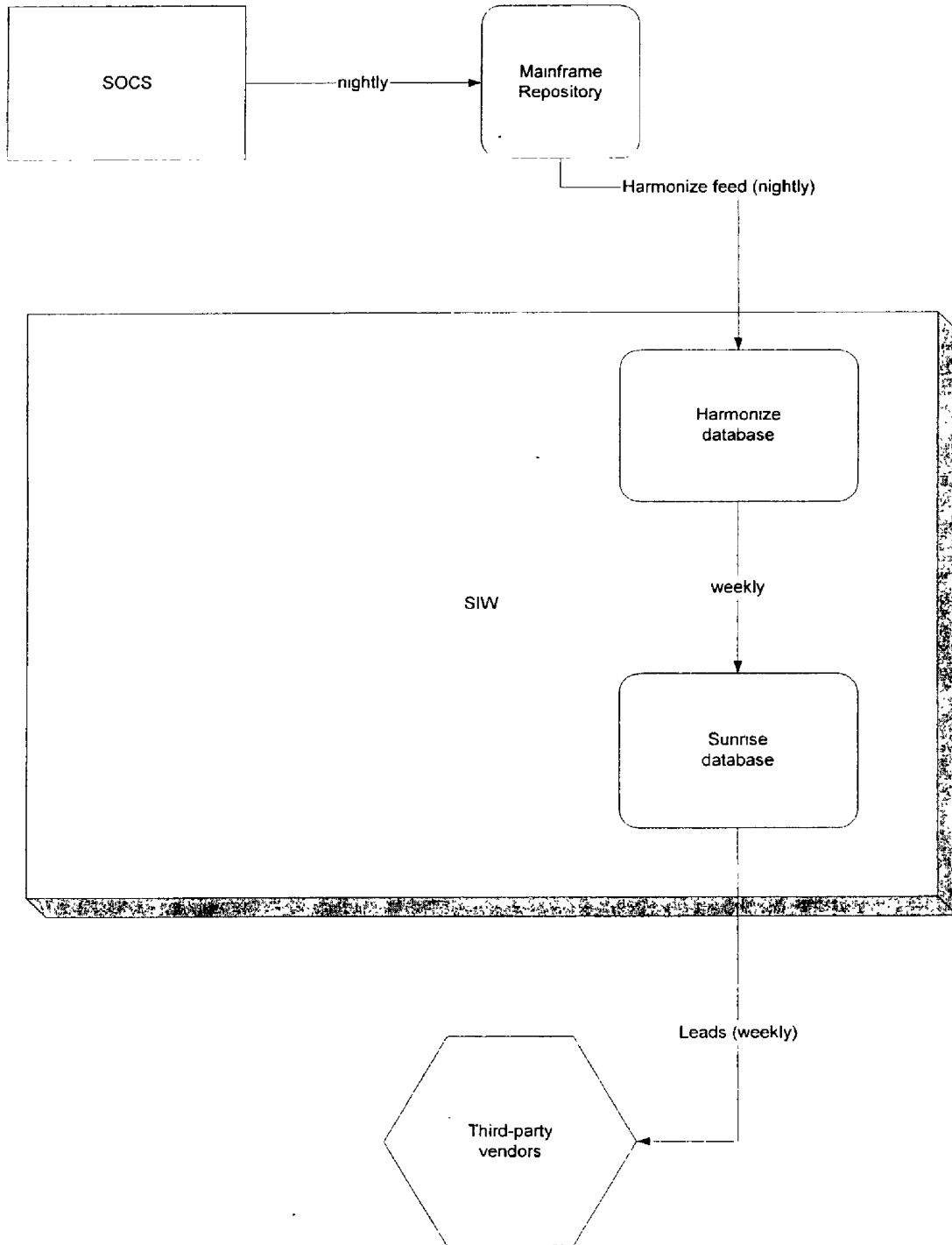
25

1 Next, Sunrise eliminates from the temporary table both those orders that do not  
2 have disconnect reason codes and those orders that have certain retail-inserted  
3 disconnect reason codes indicating that the disconnect was for a reason other  
4 than a switch to a competitor. What remains after this step is a pool of  
5 disconnect orders in a temporary table for which no reason has been provided  
6 to BellSouth's retail operations. BellSouth presumes that all of these  
7 remaining orders are competitive disconnections; in reality, some of them are,  
8 but others are non-competitive retail-initiated disconnections.

9  
10 Next, Operation Sunrise copies into a permanent table in the Sunrise database  
11 certain data from each remaining disconnect order: the NPA, the NXX, the  
12 line, the customer code, and the date the data was extracted from SOCS. The  
13 temporary table is then purged completely. At this point, all information  
14 contained in the disconnect order that even arguably could be considered CPNI  
15 or wholesale information is gone.

16  
17 Then, using the limited data in this permanent Sunrise table, Operation Sunrise  
18 matches each disconnect order to a former BellSouth customer service record.  
19 The customer service record, which comes from CRIS, shows the last  
20 information BellSouth had concerning the customer's name, address, and  
21 subscribed-to services before the disconnection occurred. Operation Sunrise  
22 then uses that information to generate leads for the retail marketing  
23 organization, which, in turn, are sent to third-party vendors.

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**Q.** MR. WOLFE, COULD YOU PROVIDE AN EXAMPLE TO ILLUSTRATE THIS DEDUCTIVE PROCESS ABOUT WHICH YOU HAVE JUST TESTIFIED?

**A.** Certainly. Take the example of a BellSouth retail customer who calls BellSouth and requests disconnection of her local service because she has decided to use her wireless phone for all her local calls (wireless substitution). In that case, the BellSouth agent handling the call would assign a reason code to that disconnect order indicating that it occurred due to wireless substitution. In this example, the disconnect order for that customer would flow into the Harmonize database on the SIW via the Harmonize feed. And Operation Sunrise would eliminate this disconnect order because a retail reason code is present, indicating that the disconnection was a wireless substitution, not a switch to a local service competitor.

**Q.** MS. SUMMERS, CAN MKIS ASCERTAIN FROM SUNRISE WHETHER A PARTICULAR DISCONNECT ORDER REPRESENTS A BELLSOUTH CUSTOMER SWITCHING TO A COMPETITOR?

**A.** No. Again, Operation Sunrise does not track whether the disconnect order originated from a CLEC or from the retail operations. Operation Sunrise functions to prevent BellSouth's retail marketing organization from accessing information from which it could discern that a disconnect order resulted from the end user switching to a specific competing carrier, or to a competitive

1 carrier at all. Sunrise eliminates disconnect orders known from their retail  
2 reason codes not to be competitive disconnects. Sunrise then assumes that all  
3 other disconnect orders are competitive disconnects. In reality, only some of  
4 this pool of disconnect orders are competitive disconnects. Thus, BellSouth  
5 uses in its retail marketing only information that is available to any carrier:  
6 information about the types of services to which a former retail customer  
7 subscribed and information that that customer has been lost.

8

9 **Q.** MS. SUMMERS, WHAT HAPPENS AFTER SUNRISE GENERATES A  
10 GROUP OF LOCAL SERVICE DISCONNECT ORDERS TO BE  
11 TARGETED FOR REACQUISITION?

12

13 **A.** MKIS then matches the telephone number associated with the disconnect order  
14 to BellSouth's former customer service record for that number in CRIS. In this  
15 process, MKIS ascertains from the CRIS customer service record whether the  
16 former customer, when he or she was with BellSouth, had certain features on  
17 his or her line. MKIS uses this information to generate a list of leads. These  
18 leads are then supplied to a direct mail vendor, which sends a switch  
19 acknowledgment letter and, in some instances, a follow-up marketing piece.

20

21 **Q.** MR. WOLFE, WHAT INFORMATION DOES BELLSOUTH PROVIDE TO  
22 THESE VENDORS?

23

24 **A.** The BellSouth records sent to the third-party vendors include the former  
25 BellSouth customer's name, billing address, working telephone number,



1 account number, language preference, NPA state code, and, in some cases, a  
2 product availability indicator, geographical indicator, and a feature spend  
3 calculation, along with directions instructing the vendor what letter or  
4 marketing piece should be sent to that former customer and when it should be  
5 sent.

6  
7 **Q.** WHAT ABOUT THE LOCAL TOLL REACQUISITION COMPONENT OF  
8 OPERATION SUNRISE, MR. WOLFE? HOW DOES IT WORK?

9  
10 **A.** First, I should point out that BellSouth no longer engages in local toll  
11 acquisition and reacquisition efforts, except in very limited circumstances.<sup>1</sup>  
12 "Local toll" refers to the provision of telecommunications service for calls  
13 outside of an end user's local calling area but within the local access and  
14 transport area ("LATA"). In Florida, the local toll function of Operation  
15 Sunrise targeted two types of end users: (1) a BellSouth local toll customer  
16 who switched his or her local toll service to another carrier, and (2) a BellSouth  
17 local service customer whose local toll service was provided by another carrier  
18 and who had never before been targeted for local toll acquisition through  
19 Sunrise.

20

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<sup>1</sup> The only local toll reacquisition that BellSouth engages in now relates to the relatively few former BellSouth local toll customers who have Area Plus or Area Plus with Complete Choice. The purpose of this activity is to warn the customer that he or she may be being disadvantaged by paying twice for the same service. That is, because Area Plus service from BellSouth involves an extended local calling area, a customer may be paying an IXC to carry calls that would otherwise be included within the customer's Area Plus plan.

1 Q. MR. WOLFE, DID THE LOCAL TOLL FUNCTION OF SUNRISE TARGET  
2 FLORIDA CUSTOMERS OTHER THAN THE TYPES YOU HAVE JUST  
3 MENTIONED?

4  
5 A. No.

6  
7 Q. WHERE DID THE INFORMATION USED TO GENERATE LOCAL TOLL  
8 REACQUISITION LEADS COME FROM, MR. WOLFE?

9  
10 A. When an end user changed its local toll carrier from BellSouth to another  
11 carrier, BellSouth received records of that transaction from the Customer  
12 Account Record Exchange ("CARE").

13  
14 Q. MR. NILSON HAS GIVEN TESTIMONY CONCERNING CARE (PP. 18-  
15 21). WHAT IS CARE, EXACTLY, MR. WOLFE?

16  
17 A. The Customer Account Record Exchange, or "CARE," is an industry-wide  
18 interface, created and managed by BellSouth's interconnection services, that  
19 interexchange carriers ("IXCs") and local exchange carriers ("LECs") use to  
20 communicate. Numerous LECs and IXCs participate in the Ordering and  
21 Billing Forum ("OBF"), an industry group. Through OBF, these carriers  
22 developed a standard system of codes and procedures to be used by LECs and  
23 IXCs to know when an interLATA or intraLATA toll customer has been  
24 acquired or lost. Any carrier can join OBF and participate in CARE. In other  
25 words, although BellSouth's interconnection group manages CARE, any carrier

1 in BellSouth's region can subscribe and obtain CARE data. BellSouth's retail  
2 operating unit subscribes like any other carrier and receives exactly the same  
3 data as any other carrier. In fact, it is my understanding that Supra itself  
4 receives the exact same types of data as BellSouth or any other subscribing  
5 carrier. I understand that paper copies reflecting PIC and LPIC changes for  
6 Supra end users are sent to Supra's offices.

7  
8 A change of local toll or long distance provider can be initiated by either a LEC  
9 or an IXC. Any time a transaction occurs that affects an end user's interLATA  
10 or intraLATA toll service, CARE sends certain data to (1) the acquiring  
11 interLATA or intraLATA carrier, (2) the losing interLATA or intraLATA  
12 carrier, and (3) the end user's local exchange carrier. The first two pieces of  
13 data serve to notify the acquiring and losing interLATA or intraLATA carriers  
14 that a customer has been lost or gained. The third piece of data serves to notify  
15 the end user's local exchange carrier that one of its customers has undergone a  
16 change in interLATA or intraLATA toll carriers.

17

18 **Q.** MR. WOLFE, MR. NILSON HAS TESTIFIED THAT BELLSOUTH DOES  
19 NOT BUY, NOR HAS BELLSOUTH EVER REQUESTED TO BUY, CARE  
20 RECORDS FOR ANY OF SUPRA'S ACCESS LINES (P. 19, LL. 14-15). IS  
21 THAT CORRECT?

22

23 **A.** If a Supra local service customer changes his or her PIC or LPIC, CARE  
24 notifies the acquiring carrier, the losing carrier, and Supra, just as it would in  
25 the case of a PIC or LPIC change involving any other LEC's local service

1 customer. In other words, CARE sends records relating to PIC and LPIC  
2 changes on every local exchange carrier's access lines, including Supra's. As a  
3 result, there is no need for BellSouth to buy or to request to buy CARE records  
4 relating to Supra's access lines in particular.

5

6 **Q.** MR. WOLFE, DID BELLSOUTH "MONITOR" ORDERS FLOWING  
7 THROUGH SOCS TO IDENTIFY LPIC CHANGES, AS MR. NILSON HAS  
8 TESTIFIED (P. 19, LL. 19-21)?

9

10 **A.** No. Again, the only source of information regarding LPIC changes that  
11 Sunrise used to generate local toll reacquisition leads was CARE.

12

13 **Q.** MR. WOLFE, DID BELLSOUTH USE THE HARMONIZE FEED IN  
14 CONNECTION WITH THE LOCAL TOLL ACQUISITION AND  
15 REACQUISITION FUNCTIONS OF OPERATION SUNRISE, AS MR.  
16 NILSON SUGGESTS AT PP. 17-18 OF HIS TESTIMONY?

17

18 **A.** No. Only CARE data was used for local toll reacquisition as I have described,  
19 and only CARE data is used as part of the limited local toll reacquisition that  
20 continues today.

21

22 **Q.** BUT MR. NILSON HAS TESTIFIED (P. 17, LL. 7-9, 22), MS. SUMMERS,  
23 ABOUT YOUR RECENT TESTIMONY IN AN ARBITRATION  
24 INVOLVING BELLSOUTH AND SUPRA THAT THE HARMONIZE FEED  
25 CONTAINS DATA REGARDING "LPIC CHANGES."

1

2 A. Yes. Please allow me to clarify my earlier testimony in connection with the  
3 arbitration. As I testified then, the Harmonize feed does contain information  
4 about LPIC changes. But Sunrise did not use that information in connection  
5 with local toll reacquisition. Again, the information that Sunrise used to  
6 identify changes in LPIC came from CARE.

7

8 Q. HOW DID SUNRISE USE THE INFORMATION RECEIVED FROM CARE,  
9 MS. SUMMERS?

10

11 A. The CARE records described above flow nightly into Sunrise, which processes  
12 these feeds once each week. Sunrise used the information in the records to  
13 identify leads for various local toll campaigns.

14

15 Q. MS. SUMMERS, HOW DID BELLSOUTH USE THE LEADS GENERATED  
16 BY OPERATION SUNRISE FOR LOCAL TOLL REACQUISITION?

17

18 A. The leads were used in various campaigns. Some of the campaigns related to  
19 the local toll acquisition and reacquisition function of Sunrise involved  
20 outbound telemarketing, and some involved direct mail. These outbound  
21 telemarketing and direct mail campaigns were handled by third-party vendors.

22

23 Q. WHAT INFORMATION DID BELLSOUTH PROVIDE TO THOSE THIRD-  
24 PARTY VENDORS AS PART OF THE LOCAL TOLL ACQUISITION AND  
25 REACQUISITION FUNCTIONS OF SUNRISE, MR. WOLFE?

1

2 A. The BellSouth records sent to the third-party vendors included the former  
3 BellSouth customer's name, billing address, working telephone number,  
4 account number, language preference, NPA state code, and, in some cases, a  
5 product availability indicator, geographical indicator, and a feature spend  
6 calculation, along with directions instructing the vendor what letter or  
7 marketing piece should be sent to that former customer and when it should be  
8 sent.

9

10 Q. MR. WOLFE, WHAT ABOUT THE PRODUCT OR FEATURE  
11 REACQUISITION COMPONENT OF OPERATION SUNRISE THAT MR.  
12 NILSON MENTIONS IN HIS TESTIMONY (P. 15, LL. 15-17)? WHAT IS  
13 IT DESIGNED TO DO?

14

15 A. This function of Operation Sunrise is used to target those BellSouth residential  
16 retail customers who disconnect a high value service such as Area Plus or  
17 Complete Choice from their lines.

18

19 Q. HOW DOES OPERATION SUNRISE TARGET SUCH CUSTOMERS, MR.  
20 WOLFE?

21

22 A. Retail customer-initiated change orders dropping features such as Area Plus or  
23 Complete Choice flow into Sunrise from SOCS. These change orders indicate  
24 that a BellSouth retail customer has dropped Area Plus or Complete Choice.  
25 Sunrise uses these change orders to identify those customers who have dropped

1 Area Plus or Complete Choice. Sunrise identifies each such customer as a  
2 possible lead for various marketing campaigns.

3

4 **Q.** MR. WOLFE, HOW DOES OPERATION SUNRISE USE THESE CHANGE  
5 ORDERS TO GENERATE PRODUCT OR FEATURE REACQUISITION  
6 LEADS?

7

8 **A.** For its feature/product reacquisition function, Sunrise uses the service order  
9 data and the active customer record on the SIW at the time of the change as the  
10 basis for targeting a particular lead for a particular campaign.

11

12 **Q.** MS. SUMMERS, HOW DOES BELLSOUTH USE THE LEADS  
13 GENERATED BY OPERATION SUNRISE FOR PRODUCT OR FEATURE  
14 REACQUISITION?

15

16 **A.** In the same way as I described with respect to local toll reacquisition. And the  
17 information supplied to third-party vendors is, likewise, the same as that  
18 supplied in connection with local toll reacquisition.

19

20 **Q.** (TO THE PANEL) DOES THIS CONCLUDE YOUR TESTIMONY?

21

22 **A.** Yes, it does.

23

24

25