

ORIGINAL

Stip # 1

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET

NO. 030349-IP EXHIBIT NO. 1

COMPANY: Bell South - Responses

WITNESS: to Super Staff Discovery

DATE: 08-29-03

DOCUMENT NUMBER-DATE

09124 SEP 23 8

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Supra Telecommunications )  
and Information Systems, Inc. against ) Docket No. 030349-TP  
BellSouth Telecommunications, Inc. )  
Regarding BellSouth's alleged use )  
of carrier to carrier information ) Filed: August 26, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S AMENDED RESPONSE TO  
FLORIDA PUBLIC SERVICE COMMISSION STAFF'S  
SECOND SET OF INTERROGATORIES (NO. 18)**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following amended response to the Florida Public Service Commission Staff's ("Staff") Second Set of Interrogatories (No. 18) dated August 5, 2003. An Amended Response is necessary to correct and clarify BellSouth's original response to Interrogatory No. 18. In this Amended Response, BellSouth reasserts and does not waive all general and specific objections previously asserted by BellSouth.

Respectfully submitted this 26th of August 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (CA)

JAMES MEZA

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5558

and

*R. Douglas Lackey*

R. DOUGLAS LACKEY (CA)

E. EARL EDENFIELD

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0763

**AMENDED RESPONSE**

REQUEST: Please refer to witness Summers' and witness Wolfe's rebuttal testimony, page 16, lines 17-25, and page 17, lines 1-6. According to Wolfe, CARE reports are used by LECs and IXC's to know when an interLATA or intraLATA toll customer has been acquired or lost. Additionally, Wolfe further states that "Supra itself receives the exact same types of data as BellSouth or any other subscribing carrier."

- 1) Do the CARE reports provide local service provider switch information? Please explain.
- 2) Could BellSouth use CARE reports as an alternative for disconnect information derived from Operation Sunrise? Please explain.

RESPONSE:

- 1) Yes, but only if the end user converts from BellSouth local and intraLATA toll to another provider for both services at the same time. In that situation, CARE data for carrier 5124 (which is BellSouth) contains transaction codes/status indicators that will identify a local line loss in addition to notifying the carrier that the customer switched local toll providers. Further, CARE can identify whether BellSouth lost the line to a reseller or to a facility based provider, which is something Operation Sunrise does not identify. Moreover, it should be noted that, both CARE and Operation Sunrise use completed service orders as the source of their local line loss reporting mechanisms.
- 2) Yes, but only currently in situations where a BellSouth loses a local and intraLATA toll line concurrently.

RESPONSE BY: Bruce Smith/Ed Wolfe

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

August 15, 2003

**Via Electronic Mail and Hand Delivery**

Linda Dodson  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
40 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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

Dear Ms Dodson:

Enclosed is BellSouth Telecommunications, Inc.'s Responses and Objections to the Staff of the Florida Public Service Commission's Second Set of Interrogatories, dated August 5, 2003 in the captioned docket.

Sincerely,

  
James Meza III (KA)

Enclosures

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

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (\*) Hand Delivery and Federal Express this 15<sup>th</sup> day of August, 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)



James Meza III (KPA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by Supra Telecommunications	)	
and Information Systems, Inc. against	)	Docket No. 030349-TP
BellSouth Telecommunications, Inc.	)	
Regarding BellSouth's alleged use	)	
of carrier to carrier information	)	Filed: August 15, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS  
TO FLORIDA PUBLIC SERVICE COMMISSION STAFF'S  
SECOND SET OF INTERROGATORIES (NOS. 14-22)**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following responses and objections to the Florida Public Service Commission Staff's ("Staff") Second Set of Interrogatories (Nos. 14-22) dated August 5, 2003. Commission ("Staff") on August 5, 2003.

**GENERAL OBJECTIONS**

BellSouth makes the following general objections to Staff's Interrogatories.

1. BellSouth objects to Staff's Instructions and Definitions to the extent they seek to impose an obligation on BellSouth beyond the requirements of the Florida law.
2. BellSouth objects to any Interrogatories to the extent that such Interrogatories may seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on grounds that such requests are irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by the applicable rules of discovery.
3. BellSouth has interpreted Staff's Interrogatories to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the

jurisdiction of the Florida Public Service Commission (“Commission”), BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive.

4. BellSouth objects to each and every Interrogatory, and instruction to the extent that such interrogatory, request or instruction calls for information that is exempt from discovery by virtue of the attorney client privilege, the work product doctrine, or other applicable privilege.

5. BellSouth objects to each Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Interrogatories. Any answers provided by BellSouth in response to these Interrogatories will be provided subject to, and without waiver of, the foregoing objections.

6. BellSouth objects to each Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

7. BellSouth objects to providing information to the extent that such information has already been provided, is already within the possession of Staff, or is readily accessible through publicly available means.

8. BellSouth objects to each Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. BellSouth objects to any Interrogatories that seek to obtain “all” of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to these Interrogatories will be provided subject to, and without waiver of, the foregoing objection.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

11. BellSouth objects to the Interrogatories on the grounds that BellSouth has filed a Motion to Stay Discovery and/or a Motion for a Protective Order regarding the discovery requests in question.

#### **SPECIFIC RESPONSES**



REQUEST: Referring to Supra witness Nilson's rebuttal testimony on page 14, lines 19-22, and page 15, lines 1-2, Nilson states:

A fair reading of this statement, however, requires at a minimum that wherever BellSouth obtains its carrier change information, that source must also be a source that is available to competitors—whether actually accessed or not—at the time BellSouth obtains the carrier change information. No competitor has direct access on a nightly basis to BellSouth's Service Order Communication System (SOCS).

Supra implies that access to BellSouth's Harmonize feed would satisfy the requirement of receiving carrier change information from an independent retail source. Would CLECs access to Harmonize feed satisfy this requirement? Please explain in detail.

RESPONSE: No, because there is no such requirement. Mr. Nilson consistently and throughout his direct and rebuttal testimony confuses retention marketing with reacquisition (winback) marketing, and does so in the above reference as well. As stated in its September 3, 1999 Order 99-223 in CC Docket Nos. 96-115 and 96-149, the FCC views retention marketing and reacquisition marketing as two distinct types of marketing,

“Regaining a customer applies to marketing situations where a customer has already switched to and is receiving service from another provider. Retention marketing, by contrast, refers to a carrier's attempts to persuade a customer to remain with that carrier before the customer's service is switched to another provider. For the purposes of this section, we shall use the term “winback” to refer only to the first situation, where the customer has already switched to and is receiving service from another provider.” ¶ 64

It appears to be this failure to distinguish between retention and reacquisition

RESPONSE (Cont'd):

marketing that has caused Mr. Nilson to propose to use the "independent retail source" requirement inappropriately.

In its Order 99-223, the FCC clearly linked the use of the "independent retail source" requirement with retention marketing as follows:

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

Conversely, reacquisition (winback) marketing occurs only after the switch to another local carrier is complete. The FCC addressed this issue in its March 17, 2003 Order in CC Docket No. 94-129 as follows:

We clarify that, to the extent that the retail arm of an executing carrier obtains carrier change information through its normal channels in a form available throughout the retail industry, and after the carrier change has been implemented (such as in disconnect reports), we do not prohibit the use of that information in executing carriers' winback efforts. ¶ 27 [emphasis added]

BellSouth, like any other local carrier, is entitled to receive notification when one of its customers disconnects a line. BellSouth's retail operations receive notification via Harmonize while CLECs receive notification via their CLEC Line Loss Notification reports. The Service Order Communication System (SOCS) is the source for both of these notifications. The information available to BellSouth includes no more (and in reality less) information than is provided in CLEC Line Loss Notification reports. Further, BellSouth is at a loss as to why Supra would need access to Harmonize as it is related solely to BellSouth customers.

RESPONSE BY: John Ruscilli

REQUEST: Referring to Supra witness Nilson's rebuttal testimony on page 16, lines 5-11, Nilson states:

Commission Order No. PSC-03-0726-FOF-TP, incorporating the FCC decisions, defined "independent retail means" to be information that BellSouth's MKIS group, or other in-house marketing apparatus, can obtain that (1) is in a form available throughout the retail industry, and (2) competitors have access to this same equivalent information for use in their own marketing and winback operations. Competitors must have access to the information no later than the time in which BellSouth obtains access to it.

Please explain how BellSouth's Harmonize feed/Operations Sunrise is not in violation of the Florida Order No. PSC-03-0726-FOF-TP, that defined "independent retail means" to be information that . . . (1) is in a form available throughout the retail industry, and (2) competitors have access to this same equivalent information for use in their own marketing and winback operations.

RESPONSE: BellSouth objects to this interrogatory on the grounds the Order No. PSC-03-0726-FOF-TP does not define "independent retail means" to be information that "(1) is in form available throughout the retail industry, and (2) competitors have access to the same equivalent information in their own marketing and winback activities." Accordingly, BellSouth cannot provide a response to the interrogatory as stated.

**REQUEST:** Please refer to Supra's response to staff's first set of interrogatories, item number 3, page 9, and Exhibit DAN-2 to Nilson's direct testimony. Supra alleges that BellSouth generated winback letters (300,000) that did not result from a disconnect code that would have been supplied to BellSouth's retail operations (i.e., that is through the Harmonize feed) the customer converted from Supra resale to Supra UNE-P.

Please explain in detail the process used by BellSouth to generate these winback letters.

**RESPONSE:** Mr. Nilson's Exhibit DAN-2 is not a winback letter sent out by BellSouth's retail operations. Instead Exhibit DAN-2 is a directory advisory card, initiated by BellSouth Advertising and Publishing Corporation ("BAPCO") that is typically sent to any customer (BellSouth or CLEC) where service order activity has occurred for which certain directory codes appear in the service order. The letter is designed to notify customers that, due to some recent change in their telephone service, these customers may be in need of new telephone directories. The letter advises the customer of a toll-free number, along with an order number and pin number that can be used only to order directories through an automated system. Importantly, the purpose of the directory cards is to ensure that all customers have access to the directories to which they are entitled.

With respect to directory cards being generated to Supra customers, during the latter part of 2002, BAPCO received a large increase in the number of service order notifications that would have prompted them to send out directory cards. Within several days of this increase, it was determined that certain "C" orders (including resale to UNE-P) were carrying an indicator in the Directory section that BAPCO interpreted as a request for directories. As a result, BAPCO put a block on these "C" orders in order to prevent the directory cards from being sent out to customers that were not appropriate candidates for new directories.

**RESPONSE BY:** John Ruscilli

REQUEST: Please refer to witness Summers' and witness Wolfe's rebuttal testimony, page 8, lines 8-11, and page 9, lines 12-17. According to Summers and Wolfe, "... a former BellSouth local service customer who has switched to a CLEC would not receive any reacquisition marketing piece as part of Operation Sunrise while his or her switch to the CLEC was still in process . . . BellSouth's retail marketing organization receives exactly the same information any carrier receives: information that a retail customer has been lost."

Please explain the timing differences between the disconnect information that BellSouth acquires and the disconnect information (line loss and CARE reports) the CLECs acquire.

RESPONSE: The CLEC Loss Notification Report is generated from SOCS completed disconnect orders and provided daily to CLECs. Sunrise collects disconnect information from the same SOCs completed disconnect order data but only produces the data on a weekly basis. The same weekly process applies to CARE data for local toll reacquisition. BellSouth doesn't use CARE data for local line loss identification.

RESPONSE BY: Ed Wolfe and Michelle

REQUEST: Please refer to witness Summers' and witness Wolfe's rebuttal testimony, page 16, lines 17-25, and page 17, lines 1-6. According to Wolfe, CARE reports are used by LECs and IXCs to know when an interLATA or intraLATA toll customer has been acquired or lost. Additionally, Wolfe further states that "Supra itself receives the exact same types of data as BellSouth or any other subscribing carrier."

- 1) Do the CARE reports provide local service provider switch information? Please explain.
- 2) Could BellSouth use CARE reports as an alternative for disconnect information derived from Operation Sunrise? Please explain.

RESPONSE:

- 1) No. CARE provides only intraLATA or interLATA toll carrier information.
- 2) No, as stated above CARE does not provide local switch information.

RESPONSE BY: Bruce Smith/Michelle Summers

REQUEST: Please refer to witness Ruscilli's rebuttal testimony, page 13, lines 15-18. Witness Ruscilli states, "The same information is available for CLECs in the CLEC Line Loss Notification reports that are made available via Performance Measurement and Analysis Platform (PMAP)."

- 1) Please explain the equivalent process and OSSs involved for generating CLEC Line Loss Notification reports.
- 2) If the process of producing retail disconnect reports and Line Loss notification reports is different, could BellSouth generate "retail" Line Loss Notification reports using the same process and OSSs involved to generate the CLEC Line Loss Notification? Please explain.

RESPONSE: 1) To generate a loss notification, BellSouth looks for "C" or "D" (disconnect) orders that meet the following criteria:

- A company code (RESH- Reseller Sharer or AECN-Alternate Exchange Carrier Name) of the appropriate company code on the SOCS order
- A DCR (Disconnect Reason) or PDCR (Partial Disconnect Reason) populated in the bill section of the SOCS order
- A SOCS status of CPX (order completed through all systems) or PCX (order completed pending total completion in hold file). Associated lines (lines in addition to the main line lost or gained) are also shown on this report.

2) At this time, PMAP does not provide a Retail Loss Notification Report. However, both the PMAP lines Loss Notification Report and Operation Sunrise receive the same information source (SOCs).

RESPONSE BY: John Ruscilli

**REQUEST:** In response to interrogatory number of one staff's set of interrogatories to BellSouth, Ms. Tidmore states that BellSouth's retail operations have no access to wholesale customer information. Ms. Tidmore states:

When service reps type in a CLEC account number, RNS returns a screen that states the account "belongs to a local service provider."

What scenarios or reasons would cause BellSouth service reps to type in a CLEC account number?

**RESPONSE:** If a CLEC end user contacts BellSouth regarding service or other issues associated with his or her service with the CLEC, the BellSouth representative enters the CLEC customer's telephone number into RNS. The RNS screen indicates the account "belongs to a local service provider." The BellSouth representative advises the CLEC end user that his account "belongs to a local service provider" and advises the customer to contact the CLEC. CLEC customers contact BellSouth for a variety of reasons resulting from the fact that customers sometimes do not understand that his or her account is wholly managed by the chosen CLEC. Areas of inquiry typically include questions relating to billing, additional services, repair issues, etc.

Another reason the CLEC end user contacts BellSouth is that the customer requests his service be "switched" to BellSouth. When the BellSouth representative enters the CLEC's customer's telephone number, the RNS screen still says this account "belongs to a local service provider." The representative chooses the option "customer wants BST as their local service provider." Selecting this option begins a "switchback" order.

**RESPONSE BY:** Traci Tidmore



**REQUEST:** In response to interrogatory number seven of staff's first set on interrogatories, BellSouth explains how SOCs creates an extract file of all orders in a 24-hour period. BellSouth also states that Operations Sunrise downloads from the Harmonize database all of the completed residential orders from the preceding seven days into a temporary file.

- a) Who at BellSouth runs the software that generates the temporary file?
- b) Can the seven-day window be changed to create a temporary file more often?

**RESPONSE:** a) the automated process is operated and maintained by the MKIS programmers assigned to Operation Sunrise

b) yes

**RESPONSE BY:** Ed Wolfe

REQUEST: On page 35, lines 6-7 of his rebuttal testimony, witness Pate states that BellSouth analyzed conversions for January through April 2003, and determined that a mere 0.09% lost dial tone during conversion.

Does this number reflect Georgia, Florida, or BellSouth systemwide?

RESPONSE: This number reflects BellSouth system-wide.

RESPONSE BY: Ron Pate

Respectfully submitted this 15th day of August, 2003.

*Nancy B. White*

NANCY B. WHITE (CA)

JAMES MEZA III

c/o Nancy Sims

Suite 400

150 South Monroe Street

Tallahassee, FL 32301

(305) 347-5558

*R. Douglas Lackey*

R. DOUGLAS LACKEY (CA)

E. EARL EDENFIELD, JR.

Suite 4300, BellSouth Center

675 W. Peachtree Street, N.E.

Atlanta, GA 30375

(404) 335-0763

COUNSEL FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

July 29, 2003

**Via Electronic Mail and Hand Delivery**


Linda Dodson  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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

Dear Ms. Dodson:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to the Staff of the Florida Public Service Commission's First Set of Interrogatories, dated July 14, 2003.

Sincerely,

  
James Meza III (KA)

Enclosures

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

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, First Class U. S. Mail and (\*) Hand Delivery this 29th 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)

  
James Meza III (K#)

REQUEST: Can BellSouth's retail operations' electronically access wholesale customer information (end-user CPNI)? Please explain in detail how BellSouth accesses wholesale customer information.

RESPONSE: No. BellSouth's retail operations have no access – electronic or otherwise – to wholesale customer information.<sup>1</sup> When service reps type in a CLEC account number, RNS returns a screen that states the account “belongs to a local service provider.” The rep can select that the customer wants to remain with the current local service provider and the RNS session is shut down and the rep ends the contact. If the customer wishes to switch to BellSouth, the rep will select that option and RNS will allow the rep to take a new order for the customer.

RESPONSE BY: Traci Tidmore

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<sup>1</sup> The only exception to the above relates to two employees in the MKIS organization who 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, and is not used in connection with, any reacquisition activities.

REQUEST: Describe any system-related firewalls and all other internal controls in place to prevent BellSouth's retail operations' from electronically accessing wholesale customer information (end-user CPNI).

RESPONSE: BellSouth's wholesale business unit places indicators on CLEC accounts. These indicators are recognized by BellSouth's retail ordering system and will not allow the retail representative to access or change the CLEC accounts. If a retail representative tries to access a CLEC account, he or she receives a message advising that the account belongs to a CLEC and instructing the agent to refer the customer to his or her current service provider.

In addition, log-on ID controls exist with respect to the Strategic Information Warehouse ("SIW"). The log-on ID issued to an employee in the retail operations will not enable access to the part of the SIW containing wholesale data.

Moreover, please see BellSouth's response to Interrogatory No. 7 regarding Operation Sunrise.

RESPONSE BY: Traci Tidmore/Ed Wolfe

REQUEST: Referring to Supra witness Nilson's testimony on page 12, footnote 7, please comment on sentence 4 of the footnote.

RESPONSE: Sentence 4 of footnote 7 states: "Finally, there remain serious security and CPNI issues raised by the direct access ordered by the Award that the parties must still resolve."

Footnote 7 was written by BellSouth, not Supra, as part of its Motion for Reconsideration and Interpretation filed on June 20, 2001 in the Arbitration between BellSouth and Supra before the CPR Institute. On page 12 of his testimony, Mr. Nilson inserted a large quote from that motion and included a footnote from it. In BellSouth's original Motion, it was footnote 5, on page 10.

By "serious security" issues, BellSouth meant corporate security concerns. Allowing an ALEC direct access to its systems would have meant that the ALEC had access to BellSouth's proprietary information.

By "CPNI issues," BellSouth meant that allowing Supra access to ROS (or DOE for that matter) would have allowed Supra potentially to have access to the CPNI of BellSouth's end users, for example.

RESPONSE BY: Ronald M. Pate



REQUEST: Referring to Supra witness Nilson's testimony on page 17, lines 7-14, and Exhibit DAN-18, page 18, lines 18-27, explain how disconnects and LPIC changes used for BellSouth's winback programs are fed from the SOCS program to the Harmonize program.

RESPONSE: Each night, SOCS creates an extract file of all orders from the preceding 24-hour period. The extract file is posted to a mainframe repository, which resides in a computer environment separate from the SIW. And each night, using the Harmonize feed, various types of orders -- including retail and wholesale disconnect orders and orders of other types -- are harvested from this extract file and downloaded into a database on the SIW called the Harmonize database. The Harmonize database is separate from the Sunrise database on the SIW. For a complete understanding of Operation Sunrise, please see BellSouth's response to Interrogatory No. 7.

Although LPIC changes do flow into the Harmonize database, that information is not used in connection with any "winback" program.

RESPONSE BY: Michelle Summers/Ed Wolfe

**REQUEST:** Referring to Supra witness Nilson's testimony on page 17, line 12, and page 19, lines 19-21, describe the CAR and CARE reports in detail — explaining the purpose of the reports, the data feeds that go in to and out of the reports, and the sources for the data feeds. Also, if possible, provide a flowchart that depicts how CAR and CARE interrelate with BellSouth's OSS.

**RESPONSE:** The Change Activity Register, or "CAR," was never offered or used in Florida. The Customer Account Record Exchange, or "CARE," is an industry-wide interface, created and managed by BellSouth's interconnection services, that interexchange carriers ("IXCs") and local exchange carriers ("LECs") use to communicate. Numerous LECs and IXCs participate in the Ordering and Billing Forum ("OBF"), an industry group. Through OBF, these carriers developed a standard system of codes and procedures to be used by LECs and IXCs to know when an interLATA or intraLATA toll customer has been acquired or lost. Any carrier can join OBF and participate in CARE. In other words, although BellSouth's interconnection group manages CARE, any carrier in BellSouth's region can subscribe and obtain CARE data. BellSouth's retail operating unit subscribes like any other carrier and receives exactly the same data as any other carrier. In fact, Supra itself receives CARE data in hard copy form.

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

CARE provides informational data to the carrier of record regarding account changes. There are two different methods by which CARE obtains this data. The first is a carrier submitted transaction (i.e., the carrier submits a file via CARE to BellSouth's wholesale organization to change the PIC of an end user. CARE will then send the former carrier a disconnect notice and the new carrier a connect notice). The second method by which CARE obtains data is reading the CRIS

RESPONSE (Cont'd):

completed order file. The CRIS completed order file provides information on end user PIC changes that occurred through the BellSouth business office (i.e., an end user calls the BellSouth business office and changes his or her PIC from Carrier A to Carrier B). BellSouth will then send the former carrier a disconnect notice and the new carrier a connect notice.

The information contained in the connect and disconnect notices are the Billing Telephone Number (BTN), Working Telephone Number (WTN), Terminal Number (if applicable), Customer Type Indicator (Business, Residential, and Coin), Non-Pub or Non-List (if applicable), Billing Name and Address (BNA), Order Number, ISDN Indicator, and a Jurisdictional Indicator (InterLATA, IntraLATA or both).

In both instances described above, if the end user's local service is a resold or UNE/UNE-P line, the local service provider will also receive a modified copy of the PIC disconnect and the connect that was sent to affected carriers (i.e., a reseller submits an order via an electronic ordering system -- LENS, TAG or EDI -- or through the LCSC to change the PIC of one of its end users. The order is processed and when complete posts to CRIS. CARE reads the CRIS completed order file, sends the disconnect notice to the former carrier, the connect notice to the new carrier and sends a copy of each to the reseller.)

RESPONSE BY: Bruce Smith/Ed Wolfe

**REQUEST:** Referring to Supra witness Nilson's testimony on page 19, lines 14 - 15, has BellSouth ever purchased or requested to purchase CAR and/or CARE records for any of Supra's access lines? If yes, please explain in detail, each transaction.

**RESPONSE:** If a Supra local service customer changes his or her PIC or LPIC, CARE notifies the acquiring carrier, the losing carrier, and Supra, just as it would in the case of a PIC or LPIC change involving any other LEC's local service customer. In other words, CARE sends records relating to PIC and LPIC changes on every local exchange carrier's access lines, including Supra's. As a result, there is no need for BellSouth to buy or to request to buy CARE records relating to Supra's access lines in particular.

**RESPONSE BY:** Michelle Summers/Ed Wolfe

**REQUEST:** Referring to Supra witness Nilson's testimony on page 17, lines 7-14, describe project Harmonize in detail. Please explain the purpose of the project, the data feeds that go in to and out of the project and the sources for the data feeds. Also, if possible, provide a flowchart that depicts how Harmonize interrelates with BellSouth's OSS.

**RESPONSE:** The following describes the information flow. SOCS is a BellSouth system that processes all retail and wholesale service orders. When a CLEC submits an LSR to convert a BellSouth retail customer's local service to that CLEC, an order flows into SOCS. Likewise, when a BellSouth retail customer calls BellSouth to disconnect service, the resulting order flows into SOCS. Numerous other transactions relating to BellSouth wholesale and retail access lines also generate orders; these orders have nothing to do with disconnection of service, but they flow into SOCS too. Each order contains an array of information about the end user account to which it pertains.

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

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

RESPONSE (Cont'd):

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

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

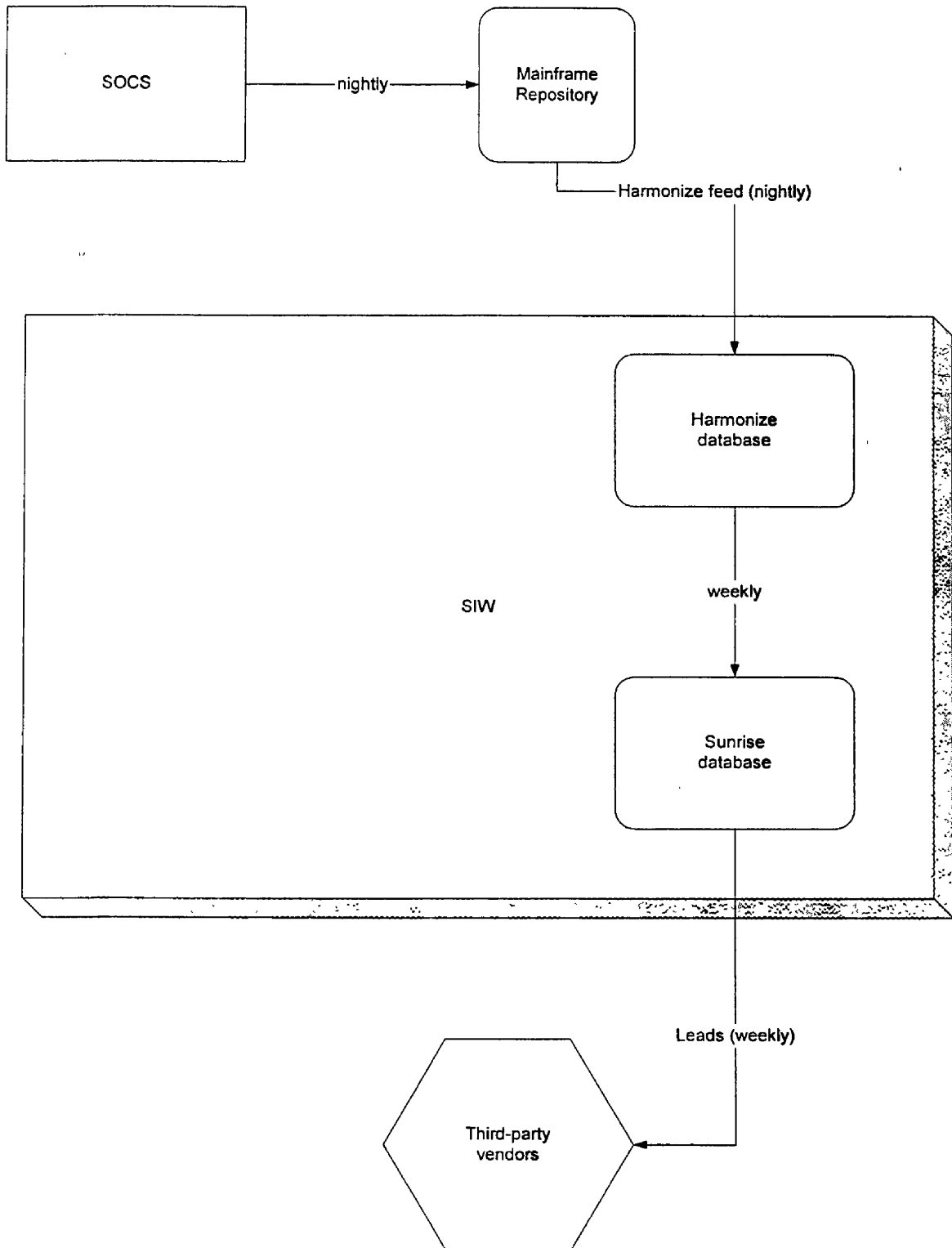
Then, using the limited data in this permanent Sunrise table, Operation Sunrise matches each disconnect order to a former BellSouth customer service record. The customer service record, which comes from CRIS, shows the last information BellSouth had concerning the customer's name, address, and subscribed-to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

The attached chart depicts this process.

RESPONSE BY: Michelle Summers/Ed Wolfe

BellSouth Telecommunications, Inc.  
FPSC Dkt. 030349-TP  
Staff's 1<sup>st</sup> Set of Interrogatories  
July 14, 2003  
Item No. 7

ATTACHMENT





BellSouth Telecommunications, Inc.  
FPSC Dkt. 030349-TP  
Staff's 1<sup>st</sup> Set of Interrogatories  
July 14, 2003  
Item No. 8  
Page 1 of 1

REQUEST: Referring to Supra witness Nilson's testimony on page 22, lines 6-14, how is Firm Order Commitment (FOC) information relayed to BellSouth's marketing department?

RESPONSE: Firm Order Commitment (FOC) information is not relayed to BellSouth's marketing department.

RESPONSE BY: John Ruscilli

REQUEST: Referring to Supra witness Nilson's testimony on page 22, lines 10-14, explain how Sunrise Systems "watch" CLEC completed orders. Explain how Sunrise Systems send related customer information to BellSouth marketing.

RESPONSE: Sunrise systems do not "watch" CLEC completed orders. The sources of the information used in local service reacquisition activities are set forth in detail in BellSouth's response to Interrogatory No. 7.

RESPONSE BY: Ed Wolfe/Michelle Summers

REQUEST: Referring to Supra witness Nilson's testimony on page 26, line 8, Supra alleges customer information from CRIS is used by BellSouth to generate winback promotions. Explain how the customer information from CRIS could be used for marketing purposes for winbacks.

RESPONSE: When a customer leaves BellSouth retail, that customer's service record while he or she was a BellSouth customer is preserved in CRIS. As explained in the response to Interrogatory No. 7, after Operation Sunrise parses out the permissible information from the disconnect orders (*i.e.* the NPA, the NXX, the line, the customer code, and the date the data was extracted from SOCS), BellSouth's retail marketing organization matches that data with the former BellSouth customers' service records in CRIS. In matching this information, BellSouth only views its historic customer service record for the customer in question and not any information from the CLEC or the customer's service records with the CLEC.

RESPONSE BY: Michelle Summers/Ed Wolfe

**REQUEST:** Explain how the data in CRIS is delineated between BellSouth's wholesale and retail operations.

**RESPONSE:** Information for both wholesale and retail billing operations is housed in the Customer Records Information System (CRIS). Wholesale "accounts" are tagged with one of two Field Identifiers (FIDs). The presence of one of these FIDs on an account will trigger a security measure within the Business Office Customer Records and Information System (BOCRIS) limiting access to the account to only those employees engaged in supporting wholesale customer care or billing functions.

**RESPONSE BY:** Clyde Greene

REQUEST: Referring to Supra witness Nilson's testimony on page 26, lines 8-13, Supra claims that a customer conversion should not trigger a winback since nothing goes through SOCS. Supra implies that this is evidence that the wholesale/retail barrier has been breached. Please explain how a winback situation would be triggered if no customer information goes through SOCS.

RESPONSE: Mr. Nilson's testimony on this point is simply wrong. When service to a BellSouth retail customer is disconnected for any reason – be it a switch to a competitor or another type of disconnection – a disconnect or change order flows through SOCS. Thus, contrary to Mr. Nilson's testimony, even if a single C order is used for a CLEC conversion, a disconnect order is generated in BellSouth's systems. It is disconnect orders that are used in reacquisition activities according to the process described in response to Interrogatory No. 7.

RESPONSE BY: Michelle Summers/Ed Wolfe

**REQUEST:** Referring to Supra witness Nilson's testimony on page 31, lines 21-26, Supra suggests that BellSouth should personalize winback mailings with an actual date as opposed to a pre-printed date. Is this a feasible option in making winback letter mailings? Please explain.

**RESPONSE:** It would be possible to date the winback letter. Loss notification letters are issued with the date the letter is processed at the print supplier. Changes in both types of letters would require BellSouth to change the formatting and layout of the letters. BellSouth has not calculated the cost of making these changes.

**RESPONSE BY:** Mickey DeBruin/Caroline Williams

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of: Complaint by Supra )  
Telecommunications and Information )  
Systems, Inc. Against BellSouth )  
Telecommunications, Inc. Regarding )  
BellSouth's Alleged Use of Carrier to )  
Carrier Information )

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Docket No. 030349-TP

**AFFIDAVIT OF EVELYN P. PETERS**

I, Evelyn P. Peters, Docket Manager, BellSouth Telecommunications, Inc. ("BellSouth"),  
being duly sworn, deposes and states as follows:

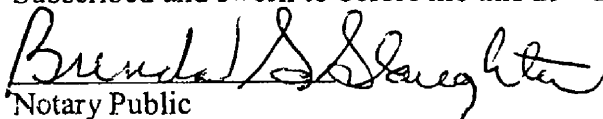
I have read BellSouth's responses to the discovery requests of the Florida Public Service  
Commission Staff in the above-captioned case, and all documents produced and statements are  
truthful and accurate to the best of my personal knowledge.

FURTHER AFFIANT SAYETH NOT.

  
EVELYN P. PETERS

STATE OF GEORGIA

Subscribed and sworn to before me this 29<sup>th</sup> day of July, 2003.

  
Notary Public

My Commission Expires:

**Brenda S. Slaughter**  
Notary Public, Rockdale County, Georgia  
My Commission Expires July 29, 2006

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by Supra )  
Telecommunications and Information )  
Systems, Inc. Regarding BellSouth's )  
Alleged Use of Carrier to Carrier )  
Information )

Docket No. 030349-TP

Filed: August 19, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
RESPONSES AND OBJECTIONS TO SUPRA'S  
FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Responses and Objections to the First Set of Interrogatories propounded by Supra Telecommunications and Information Systems, Inc.'s ("Supra") on August 7, 2003.

**GENERAL OBJECTIONS**

BellSouth makes the following general objections to Supra's First Set of Interrogatories:

1. BellSouth objects to Supra's Instructions and Definitions to the extent they seek to impose an obligation on BellSouth beyond the requirements of the Florida law.

2. BellSouth objects to any Interrogatories to the extent that such Interrogatories may seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on grounds that such requests are irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by the applicable rules of discovery.



3. BellSouth has interpreted Supra's Interrogatories to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Florida Public Service Commission ("Commission"), BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive.

4. BellSouth objects to each and every Interrogatory and instruction to the extent that such interrogatory or instruction calls for information that is exempt from discovery by virtue of the attorney client privilege, the work product doctrine, or other applicable privilege.

5. BellSouth objects to each Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Interrogatories. Any answers provided by BellSouth in response to these Interrogatories will be provided subject to, and without waiver of, the foregoing objections.

6. BellSouth objects to each Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

7. BellSouth objects to providing information to the extent that such information has already been provided, is already within the possession of Supra, or is readily accessible through publicly available means.

8. BellSouth objects to each Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. BellSouth objects to any Interrogatories that seek to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to these Interrogatories will be provided subject to, and without waiver of, the foregoing objection.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

REQUEST: Mr. Ruscilli states in his Direct Testimony that:

“A few examples of possible disconnect reasons are moving, deceased, no further use, changing local service providers, and bankruptcy.” DT, Pg. 6, lines 21-22. (Emphasis added)

Mr. Wolfe in his Rebuttal Testimony further elaborates on Mr. Ruscilli's general statement. He states:

“In the case of a BellSouth retail customer calling to disconnect his or her service, an abandoned station, a retail customer's nonpayment of his account, or numerous other reasons, the disconnect order originates from BellSouth's retail operations. In either case, a specialized reason code is assigned to each order.” RT, Pg. 4, lines 23-25 and Pg. 5, lines 1-2. (Emphasis added).

Finally, Mr. Wolfe, in his Rebuttal Testimony, clarifies who actually assigns the reason code with respect to in-bound calls to BellSouth's retail operations. He states:

“For a retail customer who has called BellSouth to disconnect service, the reason code is assigned by the retail customer service agent who handles the call.” RT, Pg. 5, Lines 6-8. (Emphasis added).

For the period beginning June 9, 2002 through June 9, 2003, please identify for the Florida region, how many disconnect orders are the product of an in-bound call to BellSouth's retail Customer Service Representatives (“CSR”) in which the CSR assigned a Disconnect Reason Code (“DCR”) identifying that the retail customer is “changing local service providers?”

RESPONSE: There is no specific disconnect reason code that identifies when a retail customer is “changing local service providers.” Thus, BellSouth is unable to identify the corresponding associated disconnect orders.

RESPONSE BY: Ed Wolfe

REQUEST: Mr. Wolfe states in his Rebuttal Testimony that:

“In the case of a CLEC converting a BellSouth retail customer to the CLEC, the disconnect or change order originates from the CLEC’s Local Service Request (“LSR”), which is sent to BellSouth either manually or electronically.” Pg. 4, lines 20-23. (Emphasis added).

Mr. Wolfe goes on to state that:

“For an LSR send by a CLEC, the disconnect or change order and the appropriate disconnect reason code are generated electronically by BellSouth’s OSS or generated by the LCSC if the CLEC has sent the LSR manually.” (Emphasis added). RT, Pg. 5, lines 4-6.

- a) For the period beginning June 9, 2002 through June 9, 2003, Please identify for the Florida region, how many disconnect orders were generated, that originated from CLEC LSRs. Specifically, those disconnection orders that are the product of a LSR. Specifically, those disconnect orders that are the product of a CLEC LSR submitted electronically?
- b) For the period beginning June 9, 2002 through June 9, 2003, Please identify for the Florida region, how many disconnect orders were generated, that originated from CLEC LSRs. Specifically, those disconnect orders that are the product of a CLEC LSR submitted manually through LCSC?

RESPONSE: BellSouth objects to this interrogatory on the grounds that it is irrelevant and not likely to lead to the discovery of admissible evidence. Subject to the foregoing objection, BellSouth is compiling information responsive to this interrogatory and will provide a response as soon as possible.

REQUEST: As already noted, Mr. Wolfe explains that:

“For an LSR sent by a CLEC, the disconnect or change order and the appropriate disconnect reason code are generated electronically by BellSouth’s OSS or generated by the LCSC if the CLEC has sent the LSR manually.” (Emphasis added). RT, Pg. 5, lines 4-6.

- (a) Please articulate with specificity “when” the CLEC LSR, that is submitted electronically, is assigned the reason code “changing local service providers?” This reason code was articulated by Mr. Ruscilli in his Direct Testimony, Pg. 6, line 22.
- (b) Please articulate with specificity “how” the CLEC LSR, that is submitted electronically, is assigned the reason code “changing local service providers?” This reason code was articulated by Mr. Ruscilli in his Direct Testimony, Pg. 6, line 22.

RESPONSE: (a) The disconnect reason code is assigned by the Local Exchange Service Order Generator (LESOG) when LESOG is generating a service order from the LSR submitted by the CLEC. For a description of LESOG, see page 22, lines 4017 of the Rebuttal Testimony of Ronald M. Pate filed on July 25, 2003.

- (b) LESOG assigns the disconnect reason code when LESOG converts the CLECLSR into a Change (C) or Disconnect (D) service order. LESOG knows to assign the code because the LSR contains a RESH or AECN and the FID DCR (disconnect reason) or PDCR (partial disconnect reason) in the Bill section of the LSR.

The RESH is the four-digit code for a reseller. The AECN is the four-digit code for a facility-based carrier. FID stands for Field Identifier.

RESPONSE BY: Ronald M. Pate

REQUEST: Mr. Pate explains that the SOAC manages the "service order" through the steps necessary to "complete the order." He states:

"SOCS communicates the order with the Service Order Activation and Control System ("SOAC"), which manages the service order process with respect to the specialized systems that design and activate network-based services, assign facilities, maintain central office inventory, and manage the customer account information. In doing so, SOAC directs each service order through all steps necessary to complete the order and provision the service." RT, pg. 31, lines 13-18. (Emphasis added).

Does SOACs automatically "notify" the Harmonize database once the CLEC initiated conversion is complete? If not, please articulate "how" the Harmonize database is "notified" (whether manually or mechanically) that a pending service order is complete?

RESPONSE: No, SOAC does not notify the Harmonize database.

For the interaction between SOCS and Harmonize, see the Rebuttal Testimony of Michelle N. Summers and Edward Wolfe, particularly pages 9-12.

RESPONSE BY: Michelle Summers and Ed Wolfe

REQUEST: Mr. Wolfe defines what information is contained in the "disconnect order" that is provided to MKIS. He states:

"Next, Operation Sunrise copies into a permanent table in the Sunrise database certain data from each remaining disconnect order: the NPA, the NXX, the line; the customer code, and the date the data was extracted from SOCs. The temporary table is then purged completely." RT, pg. 11, lines 10-1. (Emphasis added).

Please articulate with specificity what BellSouth means by "the line" and the phrase "customer code?" Please answer this question with respect to CLEC initiated service orders for conversions over UNE-P and BellSouth retail initiated service orders.

RESPONSE: The NPA is the area code. The NXX is generally attributed to the exchange. In Operation Sunrise the line represents the last four digits in a 10-digit telephone number. BellSouth assigns a three-digit Customer Code to each customer when establishing an account. The NPA, NXX, Line number plus the customer code make up the customer account number.

This information is contained on completed local service disconnect orders, regardless of the order source (CLEC initiated or retail- initiated).

RESPONSE BY: Ed Wolfe

Respectfully submitted this 19<sup>th</sup> of August, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE

(CA)

JAMES MEZA

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5558

and

*R. Douglas Lackey*

R. DOUGLAS LACKEY

(CA)

E. EARL EDENFIELD

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0763

#502027



**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by Supra )  
Telecommunications and Information )  
Systems, Inc. Regarding BellSouth's )  
Alleged Use of Carrier to Carrier )  
Information )

Docket No. 030349-TP

Filed: August 19, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND  
OBJECTIONS TO SUPRA'S FIRST REQUEST FOR PRODUCTION**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Responses and Objections to the Request for the Production of Documents propounded by Supra Telecommunications and Information Systems, Inc.'s ("Supra") on August 7, 2003.

**GENERAL OBJECTIONS**

BellSouth makes the following general objections to Supra's First Request for Production:

1. BellSouth objects to Supra's Instructions and Definitions to the extent they seek to impose an obligation on BellSouth beyond the requirements of the Florida law.
2. BellSouth objects to any Request to the extent that such Request may seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on grounds that such requests are irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by the applicable rules of discovery.
3. BellSouth has interpreted Supra's Request to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the

extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Florida Public Service Commission (“Commission”), BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive.

4. BellSouth objects to each and every Request instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney client privilege, the work product doctrine, or other applicable privilege.

5. BellSouth objects to each Request to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Requests. Any answers provided by BellSouth in response to these Requests will be provided subject to, and without waiver of, the foregoing objections.

6. BellSouth objects to each Request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

7. BellSouth objects to providing information to the extent that such information has already been provided, is already within the possession of Supra, or is readily accessible through publicly available means.

8. BellSouth objects to each Request to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. BellSouth objects to any Request that seeks to obtain “all” of particular documents, items, or information to the extent that such requests are overly broad and

unduly burdensome. Any answers provided by BellSouth in response to these Requests will be provided subject to, and without waiver of, the foregoing objection.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

**SPECIFIC RESPONSES**

BellSouth Telecommunications, Inc.  
FPSC Dkt 030349-TP  
Supra's 1<sup>st</sup> Request for Production  
Dated August 7, 2003  
Item No. 1  
Page 1 of 1

REQUEST: Chapter 47 Section 64.2009(c) of Code of Federal Regulations states:

All carriers shall maintain a record, electronically or in some other manner, of their sales and marketing campaigns that use CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, the date and purpose of the campaign, and what products or services were offered as part of the campaign. Carriers shall retain the record for a minimum of one year.

Please provide these records for sales and marketing campaigns used in Florida.

RESPONSE: Responsive documents will be produced upon the execution of a nondisclosure agreement.

REQUEST: Mr. Wolfe explains in his Rebuttal that:

“All “disconnect” orders and certain “new,” change,” and “transfer” orders flow nightly into the Harmonize database on the Strategic Information Warehouse (“SIW”), a data warehouse, via a data feed called the Harmonized feed, which is sourced from SOCS data.” (Emphasis added) RT, Pg. 5, lines 10-13.

Mr. Wolfe further provides that:

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

- a) Please provide a copy of the “extract file” that is taken from SOCS on a “nightly” basis. Please provide this data for any one week period (seven days) between June 9, 2002 through June 9, 2003, for the Florida region.

RESPONSE (Cont'd):

- b) Using the sample "extract file", produced above, please provide a copy of the Harmonize database for the same one week period used above (i.e. one week period (seven days) between June 9, 2002 through June 9, 2003, for the Florida region). Specifically, those "orders" that are harvested from this extract file and downloaded into the Harmonize database.

RESPONSE: BellSouth objects to this request on the grounds that it would require BellSouth to create documents that do not exist. Subject to the foregoing objection, BellSouth has no responsive documents because the "extract file" for any week in the time period in question has been purged.

REQUEST: Mr. Wolfe explains in his Rebuttal that:

"The local service reacquisition function of Sunrise processes data from the harmonized database on a weekly basis in a manner that filters out any information that could even arguably be considered CPNI or wholesale information." (Emphasis added) RT, Pg. 5, lines 13-16.

Mr. Wolfe goes on to explain that:

"Once each week, Operation Sunrise downloads from the Harmonize database all of the completed residential orders from the preceding seven days into a temporary table . . . At this point, the temporary table contains all orders in SOCS from the previous seven days that involve completed disconnections of residential retail service – both CLEC initiated disconnections and those initiated by BellSouth's retail operations." (Emphasis added). RT, pg. 10, lines 17-19 and 21-24.

Using the sample data that populated the Harmonize database, produced above in POD #3, for the same one week period (i.e. one week period (seven days) between June 9, 2002 through June 9, 2003, for the Florida region) please provide a copy of the "data" contained in the temporary table referenced in your Rebuttal Testimony. Specifically, the "Harmonize data" that is forwarded to the "temporary table" referenced above in your Rebuttal Testimony.

RESPONSE: BellSouth objects to this request on the grounds that it may require BellSouth to create documents that do not exist. Subject to the foregoing objection, BellSouth has no responsive documents because the "temporary table" for any week in the time period in question has been purged.

REQUEST: Mr. Wolfe then defines what information is contained in the "disconnect order" that is provided to MKIS. He states:

"Next, Operation Sunrise copies into a permanent table in the Sunrise database certain data from each remaining disconnect order: the NPA, the NXX, the line, the customer code, and the date the data was extracted from SOCS. The temporary table is then purged completely." RT, pg. 11, lines 10-12.

Mr. Wolfe states further that:

"Operation Sunrise matches each disconnect order to a former BellSouth customer service record." (Emphasis added). RT, Pg. 11, lines 17-18.

Using the sample data that populated the Temporary Sunrise database, produced above in POD #3, for the same one week period (i.e. one week period (seven days) between June 9, 2002 through June 9, 2003, for the Florida region), please provide a copy of the "data" contained in the Permanent table referenced in your Rebuttal Testimony.

RESPONSE: BellSouth objects to this request on the grounds that it may require BellSouth to create documents that do not exist. Subject to the foregoing objection, BellSouth is still determining whether it can compile documents responsive to this request.



**REQUEST:** Please provide at least twenty (20) sample "service orders" from SOCS: (A) Ten (10) CLEC initiated "change orders," and (B) Ten (10) BellSouth's initiated retail disconnection orders. The sample orders must come from the same data produced in POD Nos. 2, 3, and 4 above (i.e. one week period (seven days) between June 9, 2002 through June 9, 2003, for the Florida region).

**RESPONSE:** BellSouth objects to this request on the grounds that it is (1) irrelevant and not likely to lead to the discovery of admissible evidence; (2) may require BellSouth to create documents that do not exist; and (3) there are no service orders for the time period in question in SOCS.

Respectfully submitted this 19<sup>th</sup> of August, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE

JAMES MEZA

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5558

(KA)

and

*R. Douglas Lackey*

R. DOUGLAS LACKEY

E. EARL EDENFIELD

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0763

(KA)

#502030

OFFICE COPY

Legal Department

E. EARL EDENFIELD, JR.  
Senior Regulatory Counsel

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

August 22, 2003

**Via Electronic Mail and Federal Express**

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

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

Dear Messrs. Medacier and Cruz-Bustillo:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to Supra's Second Request for Production (6-9), dated August 15, 2003, in the captioned docket.

Sincerely,

*E. Earl Edenfield, Jr.*  
E. Earl Edenfield, Jr. (LA)

Enclosures

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

**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 22nd day of August, 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)

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

REQUEST: Please provide all documents to substantiate your response to Supra's First Interrogatory.

Interrogatory No. 1

For the period beginning June 9, 2002 through June 9, 2003, please identify for the Florida region, **how many** disconnect orders are the product of an in-bound call to BellSouth's retail Customer Service Representatives ("CSR") in which the CSR assigned a Disconnect Reason Code ("DCR") identifying that the retail customer is "changing local service providers?"

RESPONSE: See BellSouth's response to Interrogatory No. 1 in Supra's 1<sup>st</sup> Set of Interrogatories.

REQUEST: Please provide all documents to substantiate your response to Supra's Second Interrogatory.

Interrogatory No. 2(a) and 2(b)

- 2a) For the period beginning June 9, 2002 through June 9, 2003, Please identify for the Florida region, how many disconnect orders were generated, that originated from CLEC LSRs. Specifically, those disconnection orders that are the product of a LSR. Specifically, those disconnect orders that are the product of a CLEC LSR submitted electronically?
- 2b) For the period beginning June 9, 2002 through June 9, 2003, Please identify for the Florida region, how many disconnect orders were generated, that originated from CLEC LSRs. Specifically, those disconnect orders that are the product of a CLEC LSR submitted manually through LCSC?

RESPONSE: BellSouth has no responsive documents.

RESPONSE BY: Ron Pate

REQUEST: Please provide all documents to substantiate your response to 'Supra's Third Interrogatory.

3(a) Please articulate with specificity "when" the CLEC LSR, that is submitted electronically, is assigned the reason code "changing local service providers?" This reason code was articulated by Mr. Ruscilli in his Direct Testimony, Pg. 6, line 22.

RESPONSE: Please see the document provided.

RESPONSE BY: Ron Pate

BellSouth Telecommunications, Inc.  
FPSC Dkt 030349-TP  
Supra's 2nd Request for Production  
Dated August 15, 2003  
Item No. 8

ATTACHMENT

PROPRIETARY



REQUEST: Please provide all documents to substantiate your response to Supra's Fourth Interrogatory.

Interrogatory No. 4

Does SOACs automatically "notify" the Harmonize database once the CLEC initiated conversion is complete? If not, please articulate "how" the Harmonize database is "notified" (whether manually or mechanically) that a pending service order is complete?

RESPONSE: Please see BellSouth's response to Interrogatory No. 4 in Supra's 1<sup>st</sup> Set of Interrogatories.

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E. EARL EDENFIELD, JR.  
Senior Regulatory Counsel

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

August 22, 2003

## Via Electronic Mail and Federal Express

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

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

Dear Messrs. Medacier and Cruz-Bustillo:

Enclosed is BellSouth Telecommunications, Inc.'s Supplemental Response to Supra's First Set of Interrogatories (Interrogatory No. 2), dated August 6, 2003, in the captioned docket.

Sincerely,

*E. Earl Edenfield, Jr.*

E. Earl Edenfield, Jr. (EA)

Enclosures

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

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

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Electronic Mail and Federal Express this 22nd day of August, 2003 to the following:

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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)

E. Earl Edenfield, Jr.  
E. Earl Edenfield, Jr.

(104)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Supra )  
Telecommunications and Information )  
Systems, Inc. Regarding BellSouth's )  
Alleged Use of Carrier to Carrier )  
Information )

Docket No. 030349-TP

Filed: August 22, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
SUPPLEMENTAL RESPONSE TO SUPRA'S  
FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files the attached Supplemental Response to Interrogatory 2 of the First Set of Interrogatories propounded by Supra Telecommunications and Information Systems, Inc.'s ("Supra") on August 6, 2003.

Respectfully submitted this 22<sup>nd</sup> of August 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

\_\_\_\_\_  
NANCY B. WHITE (kw)  
JAMES MEZA  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305) 347-5558

and

*R. Douglas Lackey*

\_\_\_\_\_  
R. DOUGLAS LACKEY (kw)  
E. EARL EDENFIELD  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404) 335-0763

REQUEST: Mr. Wolfe states in his Rebuttal Testimony that:

“In the case of a CLEC converting a BellSouth retail customer to the CLEC, the disconnect or change order originates from the CLEC's Local Service Request (“LSR”), which is sent to BellSouth either manually or electronically.” Pg. 4, lines 20-23. (Emphasis added).

Mr. Wolfe goes on to state that:

“For an LSR send by a CLEC, the disconnect or change order and the appropriate disconnect reason code are generated electronically by BellSouth's OSS or generated by the LCSC if the CLEC has sent the LSR manually.” (Emphasis added). RT, Pg. 5, lines 4-6.

- a) For the period beginning June 9, 2002 through through June 9, 2003, Please identify for the Florida region, how many disconnect orders were generated, that originated from CLEC LSRs. Specifically, those disconnection orders that are the product of a LSR. Specifically, those disconnect orders that are the product of a CLEC LSR submitted electronically?
- b) For the period beginning June 9, 2002 through June 9, 2003, Please identify for the Florida region, how many disconnect orders were generated, that originated from CLEC LSRs. Specifically, those disconnect orders that are the product of a CLEC LSR submitted manually through LCSC?

- RESPONSE: a) There were 161,618 disconnect orders generated for the specified period.
- b) There were 3,007 disconnect orders generated for the specified period.

RESPONSE BY: Ron Pate