## Messer, Caparello & Self

A Professional Association

Post Office Box 1876 Tallahassee, Florida 32302-1876 Internet: www.lawfla.com

June 7, 2005

#### BY HAND DELIVERY

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 041144-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of KMC Telecom III LLC, KMC Telecom V, Inc., and KMC Data LLC ("KMC") are an original and fifteen copies of a Notice of Substitution of Witness and Adoption of Testimony in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Floyd R. Self

Sincerely yours,

FRS/amb Enclosures

cc: Parties of Record

DOCUMENT NUMBER - DATE

05495 JUN-78

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Sprint-Florida, Incorporated	)	
Against KMC Telecom III LLC,	)	
KMC Telecom V, Inc. and KMC Data LLC,	)	Docket No. 041144-TP
for failure to pay intrastate access charges	)	Dated: June 7, 2005
pursuant to its interconnection agreement and	)	
Sprint's tariffs and for violation of	)	
Section 364.16(3)(a), Florida Statutes.	)	
	_)	

## NOTICE OF SUBSTITUTION OF WITNESS AND ADOPTION OF TESTIMONY

Notice is hereby given to the Commission and the parties that Ronald E. Twine, will be substituted for Timothy E. Pasonski (direct and rebuttal testimony), and Mr. Twine hereby formally adopts the previously filed testimonies of Timothy E. Pasonski. Attached to this Notice are substitute Direct Testimony pages 1 and 2, which will replace Pasonski Direct page 1 and page 2 through line 9, and Rebuttal Testimony page 1, which will replace Pasonski Rebuttal page 1, which KMC will ask to be inserted into the record along with the adopted testimony at the hearing

Respectfully submitted this 7<sup>th</sup> day of June, 2005

Floyd R. Self, Esq.

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Attorneys for KMC Telecom III, LLC, KMC Telecom V, Inc., and KMC Data LLC

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of the foregoing have been served upon the following parties by hand delivery (\*) and/or U.S. Mail this 7<sup>th</sup> day of June, 2005.

Beth Keating, Esq.\* General Counsel's Office, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Ms. Nancy Pruitt\*
Division of Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Susan Masterton, Esq. Sprint-Florida, Incorporated 1313 Blairstone Road Tallahassee, FL 32301

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	_)	

## DIRECT TESTIMONY OF

RONALD E. TWINE

ON BEHALF OF

KMC TELECOM III LLC, KMC TELECOM V, INC., AND KMC DATA LLC

- 1 Q. PLEASE STATE YOUR NAME FOR THE RECORD.
- 2 A. My name is Ronald E. Twine.
- 3 Q. WHO IS YOUR EMPLOYER AND WHAT IS YOUR BUSINESS
- 4 ADDRESS?
- 5 A. I am currently a contract employee of KMC Telecom Holdings, parent
- 6 company of KMC Telecom III LLC ("KMC III"), KMC Telecom V, Inc.
- 7 ("KMC V"), and KMC Data LLC ("KMC Data"). My business address is
- 8 1755 North Brown Road, Lawrenceville, Georgia 30043.
- 9 Q. WHAT IS YOUR JOB TITLE AND WHAT ARE YOUR
- 10 **RESPONSIBILITIES?**
- 11 A. I am currently a contract employee providing litigation support and
- assistance with the transition of KMC assets to Century Telephone and
- 13 Telcove. Previously, I was employed by KMC Holdings from July 1997 till
- 14 February 2005. I was the Senior Vice President of Billing and Information
- Technology in which I was responsible for the entire Information
- Technology, Corporate Systems and Billing Department.
- 17 Q. PLEASE DESCRIBE YOUR POSITION AT KMC.
- 18 A. I was responsible for the daily operations and management of the total
- 19 enterprise's systems and "back office" systems operations, including
- 20 CABS and Subscriber billing. I headed the Corporate Strategic Planning
- 21 from the IT perspective. In this role I managed 70+ employees and
- 22 contractors. I was responsible for planning and managing the operating
- 23 expense and capital expense budget for my department.

# 1 Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL 2 BACKGROUND.

I graduated from the University of Illinois with a BS in Electrical 3 A. Engineering and also received a Masters in Business Administration from 4 5 the Graduate School of Business at the University of Chicago. I worked for the Bell System/ AT&T for 30 years. I began as an engineer for Illinois Bell 6 7 in the late 60's and advanced my career with assignments in data conversion management, programming management, data center 8 management, transferring to AT&T for the project management in 9 10 automating tax systems for the entire AT&T enterprise and finally having billing operations responsibilities for the bulk of the AT&T business long 11 distance customers. I retired from AT&T in 1997 and joined KMC to build 12 13 and lead its IT/ Billing department.

# 14 Q. PLEASE IDENTIFY ALL STATE COMMISSIONS TO WHICH YOU HAVE 15 SUBMITTED TESTIMONY.

16 A. This is my first submission of testimony before any state commission.

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## REBUTTAL TESTIMONY OF

RONALD E. TWINE

ON BEHALF OF

KMC TELECOM III LLC, KMC TELECOM V, INC., AND KMC DATA LLC

2	A.	My name is Ronald E. Twine.
3	Q.	WHO IS YOUR EMPLOYER AND WHAT IS YOUR BUSINESS
4		ADDRESS?
5	A.	I am currently a contract employee of KMC Telecom Holdings, paren
6		company of KMC Telecom III LLC ("KMC III"), KMC Telecom V, Inc
7		("KMC V"), and KMC Data LLC ("KMC Data"). My business address is
8		1755 North Brown Road, Lawrenceville, Georgia 30043.
9	Q.	ARE YOU THE SAME RONALD E. TWINE THAT PREFILED DIRECT
10		TESTIMONY IN THIS CASE?
11	A.	Yes, I am.
12	Q.	WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
13	A.	My testimony addresses the points made by the Sprint witnesses Burt,
14		Danforth, Farnan, and Wiley regarding the Agilent study, various aspects
15		of SS7 signalling, some of the jurisdictional aspects of enhanced services,
16		and Sprint's compensation, or damages, analysis.
17	Q.	WHAT INFORMATION HAVE YOU REVIEWED TO PREPARE FOR
18		YOUR REBUTTAL TESTIMONY?
19	A.	I have reviewed the five sets of Sprint prefiled direct testimony and
20		exhibits as well as some of the Sprint discovery responses.
21	Q:	SPRINT WITNESS WILEY STATES THAT KMC EITHER CHANGED
22		THE SIGNALING ASSOCIATED WITH ITS CUSTOMER'S CALLS OR
23		DELIBERATELY MISROUTED THE TRAFFIC SO AS TO FOOL SPRINT

PLEASE STATE YOUR NAME FOR THE RECORD.

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