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August 30, 1996

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 960833-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of William V. Atherton, D. Daonne Caldwell, Gloria Calhoun, Dr. Richard D. Emmerson, W. Keith Milner, Anthony V. Pecoraro, Walter S. Reid, Robert C. Scheye, and Alphonso J. Varner. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (M)

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU *Keith*
- CTR _____
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- SEC 1
- WAS _____
- OTH _____

DOCUMENT NO
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CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 30th day of August, 1996 to the following:

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Nancy B. White (pro)

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**
2 **REBUTTAL TESTIMONY OF WILLIAM VICTOR ATHERTON, JR.**
3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **DOCKET NO. 960653-TP**
5 **AUGUST 30, 1996**
6

7 Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH
8 BELLSOUTH TELECOMMUNICATIONS, INC. (HEREINAFTER
9 REFERRED TO AS "BELLSOUTH" OR "THE COMPANY").
10

11 A. My name is William Victor Atherton, Jr. My business address is 3535
12 Colonnade Parkway, Birmingham, AL 35243. I am a Manager in the
13 Infrastructure Planning organization of the Network and Technology
14 Group.
15

16 Q. ARE YOU THE SAME WILLIAM VICTOR ATHERTON, JR. WHO
17 FILED DIRECT TESTIMONY IN THIS DOCKET ON AUGUST 12,
18 1996?
19

20 A. Yes
21

22 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
23
24
25

1 A. The purpose of my testimony is to respond to Issue 21 of the AT&T
2 petition regarding BellSouth's ability to provide additional interim
3 service provider number portability ("SPNP") solutions.

4

5 Q. WHAT ADDITIONAL INTERIM SPNP SOLUTIONS HAS AT&T
6 REQUESTED IN ISSUE 21?

7

8 A. AT&T has requested two additional SPNP methods: 1) Local Exchange
9 Routing Guide ("LERG") reassignment of thousands blocks, and 2)
10 Route Indexing - Portability Hub ("RI-PH"). The LERG reassignment of
11 thousands blocks method was addressed in my direct testimony. Here,
12 I will focus on AT&T's request for RI-PH.

13

14 Q. PLEASE RECAP THE SPNP ARRANGEMENTS THAT BELL SOUTH
15 WILL PROVIDE TO AT&T.

16

17 A. In accordance with the Act and pursuant to the Federal
18 Communications Commission's ("FCC") requirements in CC Docket 95-
19 116, BellSouth will make SPNP available to ALECs, including AT&T.
20 BellSouth will provide, and expects AT&T to reciprocate, SPNP through
21 remote call forwarding ("RCF") arrangements and flexible direct inward
22 dialing ("DID") arrangements. As mentioned in my direct testimony,
23 these solutions are generally accepted by the industry as de facto
24 SPNP standards as evidenced by the Florida Stipulation and
25 Agreement, signed in August, 1995, by the Company, AT&T and other

1 parties, and approved by the Florida Public Service Commission in
2 Docket No. 950737-TP. The above methods meet the requirements of
3 the Act until a permanent number portability capability is fully
4 developed, tested and implemented. In addition, BellSouth has agreed
5 to accommodate the LERG - NXX reassignment method of SPNP as
6 requested by AT&T and described in my direct testimony.

7

8 Q. WHAT IS THE RI-PH ARRANGEMENT THAT AT&T IS
9 REQUESTING?

10

11 A. RI-PH is an extrapolation of the DID method of SPNP, where the
12 intercompany traffic is delivered at a "hub" location, typically the access
13 tandem, rather than delivered at each local switching office.

14

15 Q. PLEASE DESCRIBE THE DID METHOD OF SPNP.

16

17 A. In a DID arrangement, SPNP is accomplished as follows: When a
18 telephone call is placed to a "portable" number, the receiving local
19 switching office analyzes all seven digits of the dialed number and
20 determines that the call should be transferred to another local service
21 provider's switch. The call is then placed on a unique interoffice facility
22 to that other local service provider's switch. It is the responsibility of the
23 other local service provider to determine the end-user to which the call
24 is ultimately terminated.

25

1 Q. PLEASE DESCRIBE THE RI-PH ARRANGEMENT REQUESTED BY
2 AT&T.

3

4 A. As with DID, when a telephone call is placed to a "portable" number,
5 the receiving local switching office analyzes all seven digits of the
6 dialed number and determines that the call should be transferred to
7 another local service provider's switch. RI-PH proposes that the
8 switching office prefix a three-digit code that identifies the ALEC onto
9 the dialed number. The call is then transmitted to the access tandem
10 via a common facility or trunk group. The access tandem analyzes the
11 carrier code, determines the appropriate ALEC to which the call must
12 be directed, and transmits the call to that ALEC.

13

14 Q. IS THE RI-PH METHOD TECHNICALLY FEASIBLE?

15

16 A. BellSouth technical experts have analyzed AT&T's request and have
17 determined that it is technically feasible in all geographic areas that use
18 seven-digit local dialing. In areas where ten-digit local dialing is
19 required, the analog switching offices (e.g., the 1AESS and the 2BESS)
20 cannot do this prefix function. In other words, the analog switching
21 offices are not technically capable of transmitting a thirteen-digit call.

22

23 Q. WHY WOULD TEN-DIGIT LOCAL CALLING BE REQUIRED?

24

25

- 1 A. Ten-digit local calling is required in a situation where an area code
2 (NPA) must be split because the central office codes (NXXs) within that
3 NPA have all been assigned. When this occurs, two area codes exist
4 within one local calling area. Subscribers must then dial ten digits so
5 that the network can determine the proper call destination.
6
- 7 Q. DOES FLORIDA HAVE ANY AREAS WHERE TEN DIGIT LOCAL
8 CALLING IS REQUIRED?
9
- 10 A. Yes, there is one location in Florida where ten-digit local calling is a
11 requirement. This location involves Hollywood and a portion of the
12 North Dade area in the 305 and 954 area codes.
13
- 14 Q. ARE THERE ANALOG SWITCHES IN THE AREA WHERE TEN-DIGIT
15 DIALING IS REQUIRED?
16
- 17 A. Yes. There are five analog switches in that area.
18
- 19 Q. WHAT PERCENTAGE OF LINES IN THAT AREA DO THOSE
20 SWITCHES REPRESENT?
21
- 22 A. Approximately eight percent.
23
- 24 Q. WILL BELLSOUTH OFFER THE RI-PH CAPABILITY?
25

1 A. Yes, BellSouth will accommodate AT&T's request for this additional
2 capability, with the technical limitations mentioned above.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

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