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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth Telecommunications, Inc. entry into InterLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.	DOCKET NO. 960786-TL FILED: July 17, 1997

DIRECT TESTIMONY OF LANS CHASE
ON BEHALF OF INTERMEDIA COMMUNICATIONS INC.

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1 Q: Please state your name, address and on whose behalf
2 you are testifying.
3 A: My name is J. Lans Chase. My address is 135 West
4 Central Boulevard, Suite 1050, Orlando, Florida 32801.
5 I am testifying on behalf of Intermedia Communications
6 Inc. (ICI).
7 Q: What is your relationship with ICI?
8 A: I am an employee of ICI. As the Manager of Local
9 Resale Provisioning for ICI, I am responsible for the
10 provisioning of all local resale orders for ICI. Once
11 a customer of BellSouth (BST) decides to become an ICI
12 local resale customer, my department submits the order
13 to BST to have the customer converted to ICI local
14 resale. In addition, it is my responsibility to
15 confirm that the order is completed and that the
16 requisite customer information is entered into ICI's
17 billing system.
18 **PURPOSE OF TESTIMONY**
19 Q. What is the purpose of your testimony?
20 A. The purpose of my testimony is to describe the systems
21 in place for converting BST customers to ICI resale
22 customers and the problems we have experienced with
23 these systems to date. My testimony relates to Issue
24 15 in this docket. I believe that a simple
25 description of these systems and problems establishes
26 beyond reasonable debate that ICI does not enjoy

1 parity with BST in the conversion of a resale customer
2 from one company to the other.
3 Q. As an introduction to your testimony, please explain
4 why you believe that parity does not exist between
5 BellSouth and ICI with respect to conversion of resale
6 customers.
7 A. Perhaps the best way to explain the basis of my
8 opinion that there is no parity is to look at the
9 process simply from the perspective of conversion
10 time. If an ICI resale customer wants to convert back
11 to BST for any reason, he or she can do that in one
12 day. The customer simply calls BST and has the service
13 switched almost instantly, with or without changes to
14 the service itself. On the other hand, if a BST
15 customer wants to convert his or her service to ICI,
16 it takes two working days if things work perfectly.
17 As will be shown, however, about a third of the time
18 things do not work perfectly and in these cases it
19 takes two to four weeks to achieve the conversion.
20 This is not parity.
21 **TYPES OF RESALE ORDERS**
22 Q. What types of resale orders does ICI place with BST?
23 A. ICI primarily places two types of resale orders with
24 BST: switch "As-Is" orders and "Move, Add, or Change"
25 (MAC) orders."
26 Q. What are switch "As-Is" orders?

1 A. Switch "As-Is" orders are the initial conversion
2 orders used to make a BST customer an ICI local resale
3 customer. Under a switch "As-Is" order the customer
4 retains the same features and services as obtained
5 from BST. The customer is no longer billed by BST;
6 instead, BST bills ICI for services and features, and
7 ICI then bills the customer for local resale services.
8 Q. What are "Move, Add, or Change" (MAC) orders?
9 A. MAC orders are placed with BST after the customer is
10 an ICI local resale customer. These orders typically
11 are triggered when an ICI customer requests changes in
12 service, such as the addition of a line or a new
13 feature such as call waiting. When ICI receives such
14 a request, it must place a MAC order with BST to make
15 these changes.
16 **"AS-IS" CONVERSIONS**
17 Q. Please describe the current system for placing an
18 order to BST to convert a customer to "As-Is" resold
19 service.
20 A. Unfortunately, the process is complex, cumbersome,
21 time-consuming and prone to errors that undermine
22 ICI's marketing efforts. The simplest way to describe
23 the system is with a process flow-chart, which I have
24 attached to this testimony as Exhibit 1. As one can
25 readily see from that exhibit, the process includes
26 numerous steps and is labor intensive.

1 Q. Please give a brief narrative summary of this system.
2 A. First of all, to place a switch "As-Is" order, ICI
3 must complete a local service request (LSR) form.
4 This form identifies who is submitting the order for
5 ICI, as well as the ICI billing address. The LSR also
6 contains information such as the name, address, and
7 main account (billing) telephone number of the end-
8 user customer. The LSR also identifies all of the
9 end-user telephone numbers to be converted to ICI for
10 local resale.
11 Q. How are these completed forms generated and delivered
12 to BST?
13 A. The information described above is entered into an ICI
14 database that prints out each LSR in the industry
15 standard format adopted by the Ordering and Billing
16 Forum. On average, it takes about 15 minutes to enter
17 the information for each LSR. The printed LSRs are
18 sent daily via overnight mail to the BST local carrier
19 service center (LCSC), which is the business office
20 order center created by BST to process the CLEC local
21 resale orders.
22 Q. What happens after the LCSC receives the LSRs?
23 A. From the printed LSRs, BST issues the appropriate
24 orders in the BST system to convert the end user to
25 ICI "As-Is." Once these orders are issued, BST faxes
26 to ICI firm order confirmations (FOCs) and a copy of

1 the BST customer service records (CSRs). The FOC
2 contains the BST order numbers and date that the
3 conversion will take place. The CSR is a complete
4 record of the end user's features and services. The
5 FOC and CSR are supposed to be faxed to ICI within 48
6 hours, but often this does not happen.
7 Q. What is the next major step?
8 A. The ICI local resale billing coordinators take the FOC
9 and CSR and enter the items into ICI's billing service
10 data base using the date of conversion contained on
11 the FOC. The billing data entry takes about 6-10
12 minutes depending on the size of the account.
13 Q. Is the submission of a printed LSR the only method to
14 convert a customer?
15 A. No. Currently BST has two additional alternative
16 methods to place switch "As-Is" orders. Under the
17 first alternative, BST has introduced an EDI software
18 package that allows switch "As-Is" orders to be placed
19 via a dial-up arrangement to a Value Added Network.
20 This was introduced in late April 1997 and is
21 currently being tested by ICI. The "electronic LSR"
22 contains the same information as the printed LSR.
23 This "electronic LSR" process is not yet a significant
24 method through which ICI places customer conversion
25 orders with BST.
26 The second alternative method to submit switch

1 "As-Is" orders is BST's Local Exchange Navigation
2 System (LENS). This system allows CLECs to process
3 switch "As-Is" LSRs with BST through a web graphical
4 user interface.
5 Q. Has the LENs system proved to be the cure for the
6 problems ICI has experienced in obtaining conversions
7 from BST?
8 A. No. This system is still in its infancy; it was only
9 introduced in mid-May 1997. ICI has done some switch
10 "As-Is" test orders through LENS, but primarily uses
11 it only for pre-ordering. I will address LENS again
12 in the context of parity.
13 Q. What is pre-ordering?
14 A. Pre-ordering is the gathering of certain information
15 necessary to complete the local resale order. It
16 includes verifying the address of the end-user,
17 checking the availability of service and features in
18 the end-user's central office, assigning telephone
19 numbers, and verifying the end-user's main account
20 (billing) number.
21 Q. So in summary, in placing switch "As-Is" order with
22 BST, ICI mostly submits printed LSRs, sometimes
23 submits "electronic" LSRs using the EDI software
24 package, and almost never submits orders through LENs?
25 A. That is correct.

MAC ORDERS

Q. Describe the system for placing MAC orders with BST.

A. This process is also complex, cumbersome, time consuming and prone to errors. Attached as Exhibit 2 is a flow chart describing the MAC system.

Q. Please give a brief narrative summary of thee MAC order system.

A. To place a MAC order with BST, ICI must again complete an LSR form, which takes about 20 minutes on average. We are currently using BST's modified LSR to submit MAC orders. This modified LSR form contains the following basic information: (1) identity of the person placing the order on behalf of ICI; (2) ICI's address for billing; (3) name, address, and main account (billing) telephone number of the end-user customer; (4) all of the end-user telephone numbers that are being changed; and (5) identification of the changes to be made.

Q. Does ICI have to perform pre-ordering verification before submitting the MAC LSR?

A. Yes. As with switch "As-Is" orders, before placing the MAC order ICI must verify that the address of the customer is correct and that the feature or service requested is available in the customer's central office. This can be done using BellSouth's LENS system.

1 Q. What happens next?

2 A. We fax the modified printed LSR form to BST. BST
3 takes the form and issues the appropriate service
4 orders to make the requested changes. BST then faxes
5 the firm order confirmation (FOC) back to ICI with the
6 date the services will be added. BST is supposed to
7 send the FOC back to ICI within 48 hours. Once the
8 FOC is received, the ICI MAC coordinator calls the
9 customer to give him or her the due date. The local
10 resale billing coordinators then enter the changes
11 into ICI billing system.

12 **PROBLEMS WITH "AS-IS" CONVERSIONS**

13 Q. You have described the system for placing "As-Is"
14 LSR. Has Intermedia experienced any problems with
15 having these orders met by BST?

16 A. Yes. We have experienced two basic kinds of problems.
17 First, we have experienced delays and other quality of
18 service problems from BST that have interfered with
19 our competitive efforts. Second, the BST's entire LSR
20 system imposes on ICI a high per-customer cost for
21 achieving conversion and changes, which also impedes
22 our ability to compete with BST.

23 Q. Please describe the delays and quality of service
24 problems to which you refer.

25 A. Initially we had a problem with some customers
26 actually losing dial-tone due to the method BST uses

1 to make the resale conversion. It is my understanding
2 that BST must treat a switch "As-Is" order as a dual-
3 request, i.e., as a request to disconnect the customer
4 from BST and as a separate request to reconnect the
5 customer to ICI. Thus to achieve this simple switch
6 "As-Is," BST must issue two orders within its system:
7 first, a disconnect order and second, a reconnect
8 order. To reiterate, when ICI first began sending
9 LSRs to BST for switch "As-Is" conversions, BST
10 literally disconnected the customer at the central
11 office. We had customers who experienced service
12 interruption. BST appears to have corrected the dial
13 time interruption problem by handling an "As-Is"
14 conversion as a records change not requiring hardware
15 changes.
16 Q. What is the major quality of service problem?
17 A. The major problem we have experienced and continue to
18 experience with the switch "As-Is" conversions is that
19 BST has taken too long to provide the FOC and the CSR
20 to ICI after we have submitted the LSR. Although
21 BST's goal is to have a complete and accurate FOC and
22 CSR to ICI within 48 hours of receiving the LSR, this
23 often does not happen.
24 Q. How often does this not happen?
25 A. Too often. This is a huge problem; we simply are not
26 receiving the FOCs and CSRs from BST within the 48

1 hour period. Sometimes we received the FOC and an
2 incomplete CSR, or worse, no CSR at all. For example,
3 we may send 100 LSR orders in one week. Two weeks
4 later, for 30 to 40 of the LSRs, we will not have the
5 corresponding FOC and CSR.
6 Q. What impact does this have on ICI?
7 A. From a cost perspective, it requires ICI to divert
8 resources to address the backlog and other problems
9 with the FOCs and CSRs. For example, I have one
10 person that spends about 15 hours a week checking the
11 status of backlogged orders. She is continually on
12 the phone with the LCSC requesting FOC dates and CSR.
13 She routinely compiles lists of outstanding orders
14 faxes them to BST. BST then compiles the information
15 on these orders and sends this information to ICI via
16 overnight mail or fax. In short, it is a continuing
17 struggle for everyone involved in this process to make
18 sure all orders are timely handled by BST.
19 Q. Once BST provides ICI the late FOC and CSR are ICI's
20 problems cured?
21 A. No. Unfortunately, the initial delays cause further
22 problems down the line. Once we receive the FOC and
23 correct CSR, we still have to enter the data into our
24 billing system, even though the actual order may have
25 been worked months ago. Therefore, when we enter an
26 install date into our billing system, the customer is

1 hit with a very large first bill. This is a frequent
2 problem. Customer service receives phone calls daily
3 from customers asking why it takes so long to be
4 converted to ICI local resale.
5 Q. Are there other problems as a result of these delays?
6 A. Yes. Sometimes BST continues to bill customers who
7 have signed up with ICI but whose conversion is
8 delayed. This confuses the customer and casts ICI in
9 a bad light.
10 Q. Are there any other quality of service problems?
11 A. Yes. Other problems with conversion orders come about
12 when we are trying to do a switch "As-Is" on a complex
13 service such as ISDN, Centrex or Dedicated circuits.
14 The LCSC cannot process these orders and must forward
15 them to the BST Interconnection Services Account Team
16 to process. Nevertheless, there have been instances
17 where the LCSC has sent FOCs and CSRs for complex
18 services to ICI before BST has actually processed the
19 orders. As a result, the customer ends up receiving
20 a bill from both ICI and BST. From the customer's
21 perspective, ICI billed prematurely, although the true
22 source of the problem is that BST provided us with FOC
23 and CSR before the accounts were converted to ICI.
24 **PROBLEMS WITH MAC ORDERS**
25 Q. Has Intermedia experienced any problem with MAC
26 orders?

1 A. Yes. ICI has experienced many problems with MAC
2 orders and these problems have hurt its relationship
3 with customers and its ability to compete with BST.
4 In fact, the problems with MAC orders have probably
5 harmed ICI more than the problems with switch "As-Is"
6 orders.
7 Q. Please explain.
8 A. Once the customer subscribes to ICI local resale, he
9 or she must call ICI to make any changes, additions,
10 or moves of the service. The customer calls ICI with
11 the expectation that ICI can add or change the service
12 as quickly as BST or perhaps more quickly. With the
13 current processes, however, this simply is not
14 possible. As noted in the description of the MAC LSR
15 process, ICI must take the call from the customer and
16 then complete the LSR form which is then faxed to the
17 LCSC center. The BST representative then takes the
18 fax and enters the request and sends an FOC back to
19 ICI with the due date for the service change. As with
20 "As-Is" conversions, often this is not a smooth
21 process.
22 Q. What kinds of problems does ICI experience with these
23 MAC requests?
24 A. As already noted the process is complex, cumbersome,
25 time consuming and prone to errors, so we experience
26 the delays, miscommunications, and mistakes one might

1 expect. Perhaps the best way to describe the problem
2 with MAC orders is to provide a hypothetical but
3 realistic example. An ICI local resale customer
4 orders call waiting, caller ID and voicemail and wants
5 these features as soon as possible. ICI completes the
6 LSR to add these features having first to verify the
7 address and the feature availability for the
8 customer's central office. ICI then faxes the LSR to
9 the LCSC with a desired due date of 2 days. Two days
10 later, the customer calls ICI customer service asking
11 if the changes are complete. We have not received an
12 FOC, so we must call BST to check the status.
13 Perhaps the order was processed without our
14 receiving an FOC. In that case, we get the order
15 number and due date and relay that information to the
16 customer. However, if BST says it never received the
17 LSR, we must re-send the LSR asking for it to be
18 expedited. By the time the order is worked, it might
19 be 4 or 5 business days later. The customer is now
20 upset with our service and does not care who is to
21 blame. All the customer knows is that he or she does
22 not have the requested changes.
23 Q. So far you have addressed conversions where the
24 customer's service location remains the same. Does
25 ICI also experience problems when the customer
26 relocates?

1 A. Yes. The MAC order problems are magnified when
2 customers are requesting to physically move their home
3 or business. When move orders are not completed, for
4 any reason, customers could move to new location and
5 not have dial tone. This can put small companies out
6 of business and put people at risk with no access to
7 emergency 911.

8 **ADVERSE EFFECT OF CONVERSION PROBLEMS**

9 Q. What effect do these MAC conversion problems have on
10 ICI's relationship with its new customers?
11 A. The effect has been adverse, and in many instances,
12 fatal. Many customers have been so frustrated that
13 they switched back to BST.
14 Q. How does Intermedia learn that it has lost a customer?
15 A. BST is supposed to provide a letter to ICI that
16 indicates transfer of the customer's main account
17 telephone number and the date that the customer left
18 ICI. Until the last couple of months, however ICI has
19 not been receiving the notification letters. After we
20 received the letter, we have to deactivate our local
21 billing. Another way that we learn that we have lost
22 a local resale customer is that the customer continues
23 to receive an ICI bill after he or she has returned to
24 BST, and the customer calls us to complain. We then
25 have to cancel the local bill items and issue proper
26 credits.

1 Q. Do you have any actual examples of lost customers due
2 to delays in processing LSRs?
3 A. We have numerous examples, but two will suffice for
4 the purposes of illustration.
5 Example 1: This is a MAC order problem. On Wednesday
6 May 13, 1997, Customer A called ICI customer service
7 to request to physically move its service by May 16,
8 1997. An ICI MAC coordinator completed the LSR and
9 sent it to BST with that due date. On the 16th,
10 Customer A called ICI to check the status of the move
11 order. We had not received an FOC with the due date
12 and order numbers. An ICI MAC coordinator then called
13 BST to determine whether the order had been worked.
14 The order was complete but the LCSR representative
15 said that the system's best due date was Monday, May
16 19,1997.
17 ICI called Customer A back to say that the move
18 could not be completed on the 16th. Customer A was
19 very angry and said the company would call BST and
20 switch back, which is what happened. The regular BST
21 business office was able to get a due date of May 17,
22 1997, two days earlier than the date LCSR gave ICI.
23 In fact, on Saturday the 17th, the BST business office
24 representative called ICI to say that we must cancel
25 the pending order with the LCSC, so that a new order
26 could be issued to complete the move on that day.

1 Example 2: This example involves problems both with
2 the original conversion and with later attempts to
3 change service. On February 10, 1997, ICI sent an LSR
4 to BST convert Customer B for local resale. We
5 finally received the FOC and CSR and entered the local
6 items into ICI's billing system on March 1, 1997 with
7 an actual conversion date of February 11, 1997. On
8 April 22, 1997, the customer called ICI customer
9 service stating she received a bill from ICI and BST
10 for the same period for local service. Customer B
11 stated that she called BST who claimed that Customer
12 B was still with BST. I called BST LCSC to verify if
13 the account was converted to ICI on February 11, 1997
14 as the FOC had stated. The BST LCSC showed no record
15 of account ever being converted. I faxed a copy of
16 the FOC that we received to the LCSC. LCSC reworked
17 the order and back dated it to February 11, 1997. We
18 called Customer B to state that she would receive a
19 final bill from BST that will credit her service back
20 to that date.
21 Customer B later decided to disconnect two lines.
22 On June 12, 1997 ICI sent an order to BST LCSC to
23 disconnect two of Customer B's lines and place
24 recording on the lines that the numbers have been
25 changed. The FOC stated that the two lines were to be
26 disconnected on June 14, 1997. On June 18, 1997,

1 Customer B called ICI's customer service extremely
2 upset because the recording on the lines stated the
3 lines had been disconnected, not changed. An ICI MAC
4 coordinator called LCSC to have them put the correct
5 recording on the lines. The order was sent with the
6 correct request for the recording to state that
7 numbers had been changed, but the order was not
8 completed correctly. Customer B's patience was
9 apparently exhausted because she called BST and was
10 converted back to BST effective June 20, 1997.
11 Q. Without disclosing confidential and proprietary
12 business information, what is the scope of delay and
13 lost customer problems?
14 A. Despite the problems we have experienced with BST
15 conversion process, ICI has been able to keep the
16 "switch-back" rate of customers we have won to
17 approximately six percent. I believe that the
18 overwhelming majority of the lost customers returned
19 to BST due to problems caused by BST. Resale
20 conversion should be transparent to the end-user, and
21 the main reason a customer would transfer back is if
22 it were not transparent, that is, if the customer
23 experienced quality of service problems. Our main
24 concern here, however, is not that we have lost six
25 percent of our hard-won customers, but the effect
26 BST's problems are having on the perception of ICI in

1 the market and the costs we are incurring to process
2 conversion and service change orders.
3 Q. Please explain.
4 A. I have had departing customers say to me that they
5 would not recommend ICI to other customers because of
6 problems created by BST. Even if a prospective
7 customer understands that BST is the source of service
8 delays, double billing and other problems, he or she
9 might reasonably decide to wait until the system runs
10 more smoothly before choosing to use ICI. As a
11 result, the problems with the conversion systems
12 currently in place make it more difficult for ICI to
13 convince a customer to take resold local service and
14 to keep that customer if he or she wants service
15 changes. In addition, these problems increase the
16 cost ICI incurs in processing both the initial orders
17 and later service changes. Of course, we have no way
18 of knowing exactly how many customers choose not to
19 use ICI because of the lack of parity in order
20 processing. Nevertheless, I think it is reasonable to
21 assume that whenever we lose a customer back to BST,
22 we also lose the prospective customers he or she talks
23 to.
24 **NO PARITY**
25 Q. With respect to the process of moving a customer from
26 one company to the other, do you believe that ICI

1 enjoys parity with BST?

2 A. From my testimony about the problems we have
3 experienced, it should be obvious that I do not
4 believe there is parity. On the contrary, I believe
5 that the problems we are experiencing are evidence of
6 disparity. Specifically, there is no system available
7 that gives ICI the same access to the pre-ordering and
8 ordering functions as when a customer calls BST
9 directly. The steps required for BST and ICI
10 respectively to handle a move, add or change are
11 listed in Exhibit 3.

12 Q. Please provide a narrative comparison of the MAC
13 process for BST and ICI respectively.

14 A. When a customer calls BST the pre-ordering function
15 (address validation, feature availability, telephone
16 number reservation) and the ordering function are done
17 while the customer is on the phone. When a customer
18 calls ICI the pre-ordering information can be obtained
19 via the LENS system; however, the LSR must be manually
20 completed and faxed to BST.

21 For example, if a customer calls BST to add a new
22 business line with voicemail, the customer is given at
23 that time the new phone number, voicemail access
24 number, voicemail password, and date service is due.
25 But, if the customer calls ICI requesting the same
26 order, ICI would be able to validate the address,

1 access feature availability, and reserve a phone
2 number, but ICI could not give the customer a due date
3 until the order has been processed by BST. As
4 previously explained, the LSR would then have to be
5 completed with the necessary service request including
6 the reserved telephone number. ICI then has to wait
7 for a faxed FOC that gives the due date and voicemail
8 access number and password. If the FOC is not sent
9 within the 48 hours, ICI must call the BST LCSC to get
10 a status on the order. Again, sometimes the faxes do
11 not make it through, so ICI then would have to resend
12 the order further delaying the provisioning of the
13 service. Again, only when ICI receives the FOC can we
14 call the customer and confirm the due date, voice mail
15 access number, and password.
16 **LENS DOES NOT YET BRING PARITY**
17 Q. Does LENS cure this inequality?
18 A. No. To reiterate briefly, BST introduced an
19 Operational Support System (OSS) called Local Exchange
20 Navigation (LENS) in the middle of May 1997. This
21 limited system is a web-based system that allows CLECs
22 to access pre-ordering information via an inquiry mode
23 and to place four types of firm orders.
24 The first type of resale order that one can place
25 using LENS is a switch "As-Is" order. The second is
26 a switch-as-specified, or switch-with-changes, which

means that one converts the customer to ICI and change features and service at the same time. This is of limited use to ICI, as we do not change services on the initial conversion. The only reason ICI would "switch-with-change" would be to switch the customer and change the long distance PIC code to ICI. But, LENS does not allow us to do that simply by filling out field that indicates the long distance PIC. In order to do the switch-with-changes where the only change is the long distance PIC, we must is to recreate each telephone number with all feature codes that it currently has and then designate a long distance PIC. This is unnecessarily cumbersome.

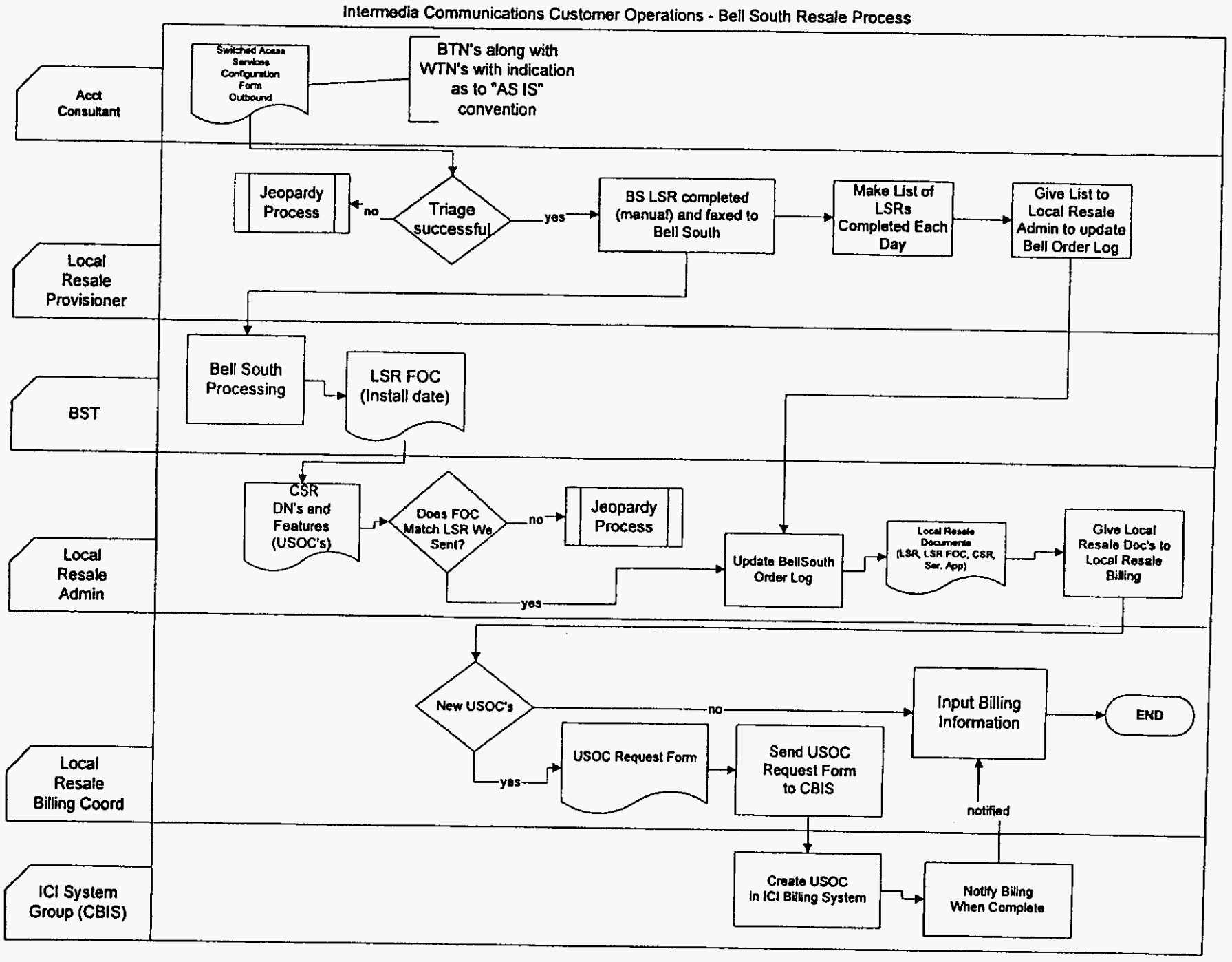
The third type of order that can be placed using LENS is a total disconnect of an account. We have not had any request to date to disconnect entire accounts. Frequently, we do have requests to disconnect certain numbers on accounts, but LENS does not currently allow this.

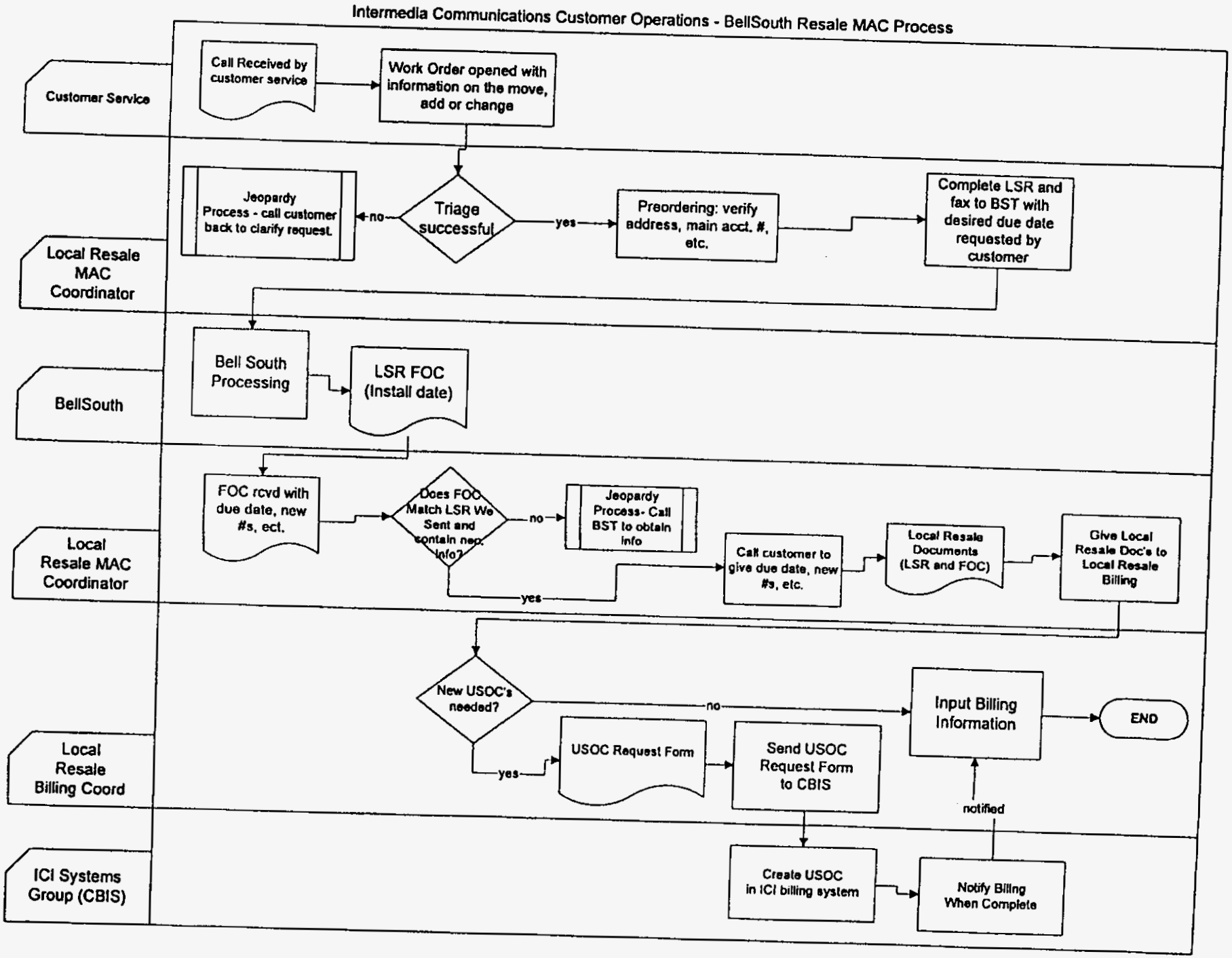
The fourth type of order LENS allows is to establish new service at an address where there is currently no working service. ICI has had very few requests for these types of orders, since we do mostly switch "As-Is" orders when first obtaining the customer.

Q. Are there other limitations to LENS?

1 A. Yes. LENS does not automatically send the FOC and due
2 date. The CLEC user must periodically check for FOCs.
3 The CSRs are not provided automatically by LENS
4 either. However, in mid-June 1997 BST made view and
5 printing of the CSR available, and is available in
6 seven of the nine BST states. View and printing is
7 not available in Georgia and Louisiana, but PSC
8 approval is pending.
9 Q. Please summarize your view of LENS.
10 A. LENS is better than the paper LSR for switch "As-Is"
11 and switch-with-changes because a BST representative
12 does not have to issue the orders. However, it is
13 limited for MAC orders. Change orders, (e.g. PIC
14 changes) and Add orders (e.g. adding features and
15 lines) are currently not available using the LENS
16 system. BST estimates that it will be functional for
17 these tasks sometime in 1997, but could not provide a
18 firm date.
19 **CONCLUSION**
20 Q. In your opinion, have these problems adversely
21 affected Intermedia's ability to compete in the local
22 market?
23 A. Yes, these problems have adversely affected
24 Intermedia's ability to compete in the local market.
25 The problems with the orders that I have described
26 create customer frustration, give customers a negative

1 perception of ICI, add to ICI's administrative costs,
2 cause delays in billing, and cause delays in
3 provisioning the service.
4 Q. In your opinion, does ICI enjoy parity with BST with
5 respect to the conversion process?
6 A. No. It takes both more time and labor to convert a
7 BST customer to ICI than it does to convert an ICI
8 customer to BST. To reiterate, if a BST customer
9 wants to convert his or her service to ICI, about a
10 third of the time it takes two to four weeks to
11 achieve the conversion. Based on my experience in the
12 field, it takes one business day for BST to switch
13 back one of our customers to its service. In all
14 cases that I am aware of, if the customer becomes
15 dissatisfied with our service due to delays introduced
16 by BST, he or she simply can call BST and have the
17 service switched almost instantly. This is not
18 parity.
19 Q. Does this complete your testimony?
20 Y. Yes.
21
22


Intermedia Communications Customer Operations - Bell South Resale Process
Acct Consultant
Local Resale Provisioner
BST
Local Resale Admin
Local Resale Billing Coord
ICI System Group (CBIS)
Switched Access Services Configuration Form Outbound
BTN's along with WTN's with indication as to "AS IS" convention
Jeopardy Process
no
Triage successful
yes
BS LSR completed (manual) and faxed to Bell South
Make List of LSRs Completed Each Day
Give List to Local Resale Admin to update Bell Order Log
Bell South Processing
LSR FOC (Install date)
CSR DN's and Features (USOC's)
Does FOC Match LSR We Sent?
no
Jeopardy Process
yes
Update BellSouth Order Log
Local Resale Documents (LSR, LSR FOC, CSR, Ser. App)
Give Local Resale Doc's to Local Resale Billing
New USOC's
no
Input Billing Information
END
yes
USOC Request Form
Send USOC Request Form to CBIS
notified
Create USOC in ICI Billing System
Notify Billing When Complete


Intermedia Communications Customer Operations - BellSouth Resale MAC Process
Customer Service
Local Resale MAC Coordinator
BellSouth
Local Resale MAC Coordinator
Local Resale Billing Coord
ICI Systems Group (CBIS)
Call Received by customer service
Work Order opened with information on the move, add or change
Jeopardy Process - call customer back to clarify request.
no
Triage successful
yes
Preordering: verify address, main acct. #, etc.
Complete LSR and fax to BST with desired due date requested by customer
Bell South Processing
LSR FOC (Install date)
FOC rcvd with due date, new #s, ect.
Does FOC Match LSR We Sent and contain nec. info?
no
Jeopardy Process- Call BST to obtain info
yes
Call customer to give due date, new #s, etc.
Local Resale Documents (LSR and FOC)
Give Local Resale Doc's to Local Resale Billing
New USOC's needed?
no
Input Billing Information
END
yes
USOC Request Form
Send USOC Request Form to CBIS
notified
Create USOC in ICI billing system
Notify Billing When Complete

BST MAC PROCESS
vs.
ICI MAC PROCESS

BellSouth process to add a new line:

1: Customer calls in request to the BST Business Office

2: BST rep takes info-
- A: Phone number
- B: Address of the end user
- C: Location for new line to be installed

3: BST rep enters work order into BST system

4: Work order processed by system which then supplies-
- A: New telephone number
- B: Due date
- C: Order number

5: BST rep gives this info to customer.

ICI process to add a new line:

1: Customer calls in request to ICI Customer Service

2: ICI rep takes customer info-
- A: Account number
- B: Address of end user
- C: location for line to be installed

3: ICI creates work order

4: Work order assigned to Local Mac Coordinator

5: Local MAC Coordinator completes pre-ordering activity
- A: Confirms Main Phone number

B: Confirms service address
C: Fills out LSR w/ desired due date
D: Faxes LSR to LCSC

6: BST LCSC receives LSR

7: BST LCSC processes LSR
A: Assigns LSR to BST rep
B: Rep enters order into BST system
C: Work order processed by system which then supplies-
New telephone number
Due date
Order number

8: BST rep faxes FOC to ICI

9: FOC received by ICI MAC Coordinator

10: ICI MAC Coordinator reviews FOC
A: Confirms that it is the proper work order
B: Checks to see if this matches customer needs

11: ICI MAC Coordinator calls customer and confirms order done

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery*, Federal Express** and/or U.S. Mail this 17th day of July, 1997, to the following:

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