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Marsha E. Rule
Attorney

Suite 700
101 N. Monroe St.
Tallahassee, FL 32301
904 425-6365
FAX: 904 425-6361

July 29, 1997

Mrs. Blanca Bayo
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Docket No. 960786-TL

Dear Mrs. Bayo:

Please accept for filing in the above-referenced docket substitute page numbers 82 and 83 of the prefiled Direct Testimony of Jay Bradbury on behalf of AT&T Communications of the Southern States, Inc., filed on July 17, 1997.

A copy of these substitute pages have been served on all Parties of Record.

Yours very truly,

Marsha E. Rule

MER:sad

cc: Parties of Record

(Cms)
Legal - 2
Linda/Mat - 5 + org
Sec - 1

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FPSC-RECORDS/REPORTING

EX-114
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1 never agreed to the field size in question. Manual work arounds will be
2 implemented to allow multiple listing types to be processed. These work
3 arounds will restrict AT&T's ability to serve its customers.

4

5 **Q. AT THE PRESENT, DO BELLSOUTH'S OPERATIONS SUPPORT**
6 **SYSTEMS ALLOW NEW ENTRANTS TO PERFORM**
7 **PREORDERING AND ORDERING IN SUBSTANTIALLY THE**
8 **SAME TIME AND MANNER AS BELLSOUTH?**

9 No. Attached to my testimony are two exhibits (Exhibits JB-10, JB-11) that
10 contain performance data from AT&T's SRT/MRT with BellSouth in Georgia
11 and a comparative analysis of that performance. Collectively, these exhibits
12 demonstrate that BellSouth's performance as a supplier of local resold
13 services has been inconsistent and has not achieved the initial targets
14 contained in AT&T's interconnection agreement with BellSouth. There's no
15 reason to expect better performance in Florida. Without data regarding
16 BellSouth's internal performance, AT&T cannot determine how BellSouth's
17 performance as a retailer compares with its performance as a wholesaler. All
18 indications, however, suggest that BellSouth's wholesale performance is
19 inferior to its retail performance, and thus it does not provide new entrants
20 with the ability to compete effectively.

21

22 **Q. PLEASE DESCRIBE THE EXHIBITS.**

23 Exhibit **JB-10** is a set of data currently under development to depict the
24 provisioning performance of BellSouth from the perspective of AT&T's
25 customer on a weekly basis from March 17, 1997, to the present. These nine

1 charts depict Volumes, Firm Order Confirmation Receipt, Firm Order
2 Confirmation Receipt by Interval, Completion Notice Receipt, Completion
3 Notice Receipt by Interval, New Order Completions, Migration Order
4 Completions, Completion Intervals, and Back Log **JB - 10** will be updated at
5 or before the hearing with most current set of charts existing at that time
6 reflecting performance across a broader range of measures and current to that
7 point in time. This exhibit shows that from the perspective of AT&T,
8 BellSouth is not meeting its commitment to return FOCs within 24 hours
9 (Page 3) or its commitment to return CNS within 1 day (Page 5). From the
10 perspective of AT&T's end-user, BellSouth is not completing new
11 installations on the requested due date (Page 7) or migration orders on the
12 requested due date (Page 8).

13
14 Exhibit **JB - 11** is a set of ten charts comparing BellSouth's current
15 month and year-to-date performance in provisioning and maintenance to their
16 peers and the national composite. Exhibit **JB - 11** also will be updated at or
17 before the hearing. This exhibit shows that BellSouth is unable to meet its
18 own committed due dates for consumer and business work orders. For
19 example, Page 1 shows that BellSouth completed only 49% of work orders
20 on time, and Page 2 shows that only 60.5% of business work orders were
21 completed on time. Moreover, installation intervals for both consumer and
22 business installations exceed 13 days on average (Page 3 and Page 4).
23 Additionally this exhibit shows that BellSouth's average cycle time to restore
24 service to a customer who is out of service is 72.5 hours, about three times
25 longer than the target time of 24 hours (Page 5). BellSouth's average cycle

CERTIFICATE OF SERVICE

DOCKET NO. 960786-TL

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties of record this 29th day of July, 1997:

BellSouth Telecommunications
c/o Nancy H. Sims
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Vicki Gordon Kaufman, Esq.
Florida Competitive Carriers
P. O. Box 10967
Tallahassee, FL 32302

Kenneth Hoffman, Esq.
Rutledge, Ecenia et al
P. O. Box 551
Tallahassee, FL 32302

Brian Sulmonetti
LDDS WorldCom Communications
1515 S. Federal Hwy., #400
Boca Raton, FL 33432-7404

Floyd R. Self, Esq.
Messer Caparello et al
P. O. Box 1876
Tallahassee, FL 32302

Monica M. Barone, Esq.
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Andrew O. Isar
Director - Industry Relations
Telecommunications Resellers
Gig Harbor, WA 98335-4461

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32301

Donna Canzano, Esq.
Patrick K. Wiggins, Esq.
Wiggins & Villacorta, P.A.
P. O. Drawer 1657
Tallahassee, FL 32302

Steve Brown, Esq.
Intermedia Communications Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

C. Everett Boyd, Jr., Esq.
Ervin, Varn, Jacobs et al
P. O. Drawer 1170
Tallahassee, FL 32302

Benjamin W. Fincher, Esq.
Sprint Communications
3100 Cumberland Circle
Atlanta, GA 30339

Peter M. Dunbar, Esq.
Robert S. Cohen, Esq.
Pennington, Culpepper et al
P. O. Box 10095
Tallahassee, FL 32302

Laura Wilson/Charles Dudley
Florida Cable
Telecommunications Assoc.
310 N. Monroe St.
Tallahassee, Fl. 32301

Richard M. Rindler, Esq.
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Sue E. Weiske, Esq.
Time Warner Communications
160 Inverness Drive West
3rd Floor North
Englewood, CO 80112

Tom Bond, Esq.
MCI-Telecommunications
780 Johnson Ferry Rd. #700
Atlanta, GA. 30342

A handwritten signature in black ink, appearing to read 'M. Rule', with a long horizontal flourish extending to the right.

Marsha E. Rule