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July 31, 1997

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Docket No. 960786-TL

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of the Rebuttal Testimony of Jay Bradbury, John Hamman and C. Michael Pfau on behalf of AT&T. Also enclosed are an original and fifteen (15) copies of the Rebuttal Testimony of David Kaserman filed jointly on behalf of AT&T and MCI.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Marsha E. Rule

cc: Parties of Record

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- LIN 5 + 079
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

*Bradbury - 07770-97 ✓*  
*Hamman - 07771-97*  
*Pfau 07772-97*  
*Kaserman - 07773-97*

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**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 31<sup>st</sup> day of July, 1997:

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Marsha E. Rule

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of ) DOCKET NO. 960786-TL  
BellSouth Telecommunications ) FILED: July 31, 1997  
Inc.'s Entry Into InterLATA )  
Services Pursuant to Section 271 )  
of the Federal )  
Telecommunications Act of 1996. )

REBUTTAL TESTIMONY  
OF  
JAY BRADBURY  
ON BEHALF OF  
AT&T COMMUNICATIONS OF  
THE SOUTHERN STATES INC.

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 2 \_\_\_\_\_  
LIV 5 + orig \_\_\_\_\_  
OFC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
07770 JUL 31 5  
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1 BACKGROUND

2

3 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

4 A. My name is Jay Bradbury. My business address is 1200 Peachtree Street,  
5 Atlanta, Georgia.

6

7 **Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS DOCKET?**

8 A. Yes. I filed direct testimony on July 17, 1997.

9

10 **Q. WHAT IS THE SCOPE OF YOUR REBUTTAL TESTIMONY?**

11 A. I address five important points. First, I explain that the work-arounds  
12 proposed by BellSouth to compensate for the problems associated with  
13 LENS being a human-to-machine interface are not commercially viable  
14 and certainly do not provide nondiscriminatory access. Second, I explain  
15 that the pre-ordering capabilities of LENS are not available to new  
16 entrants submitting service orders via the industry-standard EDI ordering  
17 interface, the Personal Computer based EDI ordering package, or by fax  
18 machine in the manner described by Ms. Calhoun. Consequently,  
19 BellSouth does not provide nondiscriminatory access to pre-ordering  
20 functions. Third, I explain that, contrary to Ms. Calhoun's claims,  
21 BellSouth does not provide new entrants with nondiscriminatory access to  
22 BellSouth's ordering functions for so-called complex services. Fourth, I  
23 correct the false impression that Ms. Calhoun created regarding the  
24 Georgia PSC's findings on LENS. Fifth and finally, I explain that Ms.

1 Calhoun's claim that BellSouth is providing new entrants with timely and  
2 useful usage data is incorrect. (Issues 2, 3, 3(a), 10, 15, 15(a)).

3

4 **Q. PLEASE EXPLAIN BELLSOUTH'S PROPOSED WORK-**  
5 **AROUNDS TO COMPENSATE FOR THE PROBLEMS**  
6 **ASSOCIATED WITH LENS BEING A HUMAN-TO-MACHINE**  
7 **INTERFACE.**

8 A. In her direct testimony at pages 10-11, BellSouth Witness Calhoun  
9 suggests two work-arounds to "integrate" LENS with a new entrant's  
10 operational support systems ("OSS") to compensate for the fact that LENS  
11 is a human-to-machine interface. The proposed methods are for a new  
12 entrant to: (1) "cut and paste" information from LENS into the new  
13 entrant's OSS; and (2) develop and build a Common Gateway Interface  
14 (CGI). These methods are commercially impracticable and  
15 discriminatory.

16

17 Cutting and pasting information from LENS into a new entrant's OSS is  
18 a manual and cumbersome process. From a practical standpoint, it offers  
19 few if any advantages over retyping the information into the new entrant's  
20 OSS. The data elements and formats used in LENS are not consistent with  
21 those used in the industry standard EDI ordering interface, the PC based  
22 EDI package, or the Ordering and Billing Forum ("OBF") fax forms, so  
23 cutting and pasting will additionally necessitate editing. Furthermore,  
24 cutting and pasting is available only if the new entrant's OSS uses certain  
25 software. In any event, forcing new entrants to use this manual and

1           cumbersome process to overcome a LENS design deficiency is  
2           discriminatory because BellSouth does not have to cut-and-paste between  
3           different systems to perform its own OSS functions.

4  
5           With respect to developing and building screen-scraping or CGI software,  
6           I touched upon that issue in my direct testimony at page 36-39. To  
7           summarize, I explained that "screen scraping" and using "Tag Value" data  
8           streams would increase a new entrant's costs and result in longer  
9           operational disruptions whenever BellSouth changed LENS. CGI is a Tag  
10          Value data stream, so it is similarly objectionable. I also explained that a  
11          new entrant cannot implement either screen-scraping or Tag Value data  
12          streams if BellSouth does not provide the specifications for LENS, the  
13          Web page screens it produces, or the Tag Values that will be sent in place  
14          of the screens. In her direct testimony at page 12, Ms. Calhoun states that  
15          BellSouth's CGI specification is available to any new entrant interested in  
16          pursuing that option. That is incorrect, and the brief chronology provided  
17          below demonstrates that BellSouth has not provided the information  
18          necessary to implement the techniques it proposes:

19                    August 23, 1996        BellSouth and AT&T discuss LENS for the  
20    first time. AT&T reasserts its need for a  
21    machine-to-machine interface instead of the  
22    LENS' human-to-machine interface.

23                    September 6, 1996     BellSouth prepares a "White Paper"  
24    describing a "data stream" and a "Tag  
25    Value" method that BellSouth could

1 generate from its LENS server instead of  
2 Web pages.

3 Sept. 96 to Jan. 97 During these months, AT&T repeatedly  
4 requests additional specifications regarding  
5 BellSouth's proposed data stream and Tag  
6 Value methods. BellSouth does not provide  
7 the requested specifications.

8 January 23, 1997 BellSouth and AT&T meet to discuss the  
9 Tag Value method. BellSouth states that it  
10 had dedicated its resources to implementing  
11 LENS, and believes that it could implement  
12 the Tag Value method within 30 days after  
13 LENS was implemented (i.e., May 1, 1997).  
14 AT&T renews its request for technical  
15 specifications.

16 March 20, 1997 After the previous unsuccessful attempts by  
17 the AT&T team to obtain technical  
18 specifications for implementing the Tag  
19 Value system, AT&T executives were  
20 forced to intervene in the process. As a  
21 result, BellSouth finally provides the  
22 technical specifications for implementing  
23 the Tag Value method. AT&T determines  
24 that July 1, 1997, was then the earliest  
25 possible date that the parties could complete



1 development and testing of the Tag Value  
2 method.

3 April 1-3, 1997 BellSouth advises new entrants at LENS  
4 demonstrations that the Tag Value method is  
5 an available alternative to the LENS Web  
6 page.

7 April 8, 1997 BellSouth advises AT&T that current Tag  
8 Value specifications are not technically  
9 feasible and that implementation of the Tag  
10 Value method cannot occur by July 1, 1997.

11 April 14-15, 1997 BellSouth and AT&T discuss alternatives  
12 ranging from the original Tag Value  
13 approach to finding commercially available  
14 software to perform conversion work.  
15 Neither BellSouth nor AT&T find such  
16 software, and both estimate it would take 2-  
17 3 months to develop the software.

18 April 15, 1997 BellSouth advises the Georgia PSC that the  
19 Tag Value alternative (referred to as the  
20 Common Gateway Interface or CGI) builds  
21 upon the LENS interface; and, therefore,  
22 firm specifications cannot be provided until  
23 the LENS interface is finalized.

24 April 25, 1997 BellSouth faxes AT&T a description of  
25 LENS Web-page outputs from which

1 BellSouth says AT&T can develop its own  
2 conversion program.

3 May 5, 1997 At a LENS demonstration, BellSouth's  
4 project manager for LENS states that LENS  
5 has changed since becoming "available" on  
6 April 28, and it will continue to change on  
7 no less than a monthly basis through at least  
8 the end of 1997.

9 May 19, 1997 BellSouth's project manager for LENS  
10 confirms in a letter that the LENS design is  
11 immature, that the system will require  
12 multiple and frequent changes, and that it  
13 will not be stable for six to nine months.

14

15 As BellSouth acknowledged on April 15 in its report to the Georgia PSC,  
16 the Tag Value alternative cannot occur until the LENS interface is  
17 finalized. BellSouth, however, does not expect that the LENS design will  
18 be stable until 1998. Accordingly, it is commercially impracticable, if not  
19 virtually impossible, for any new entrant to develop systems that will  
20 allow them to integrate their OSS with LENS. This is particularly true  
21 because the permanent interfaces under AT&T's interconnection  
22 agreement should be completed by December 31, 1997. It makes no sense  
23 for AT&T or any other new entrant to expend resources to develop an  
24 interim interface that probably could not be implemented before the  
25 permanent interfaces are implemented. In any event, the Act requires

1 BellSouth to provide a nondiscriminatory interface; it does not require  
2 new entrants to develop systems to minimize the impact of BellSouth's  
3 discriminatory interfaces.

4  
5 Furthermore, even if such alternative software were to be developed by  
6 new entrants, the resulting data elements extracted would still not be  
7 consistent with those used in the industry standard based EDI ordering  
8 interface, the PC based EDI ordering package, or the OBF based fax  
9 forms. LENS data elements do not conform to EDI or OBF guidelines.

10

11 **Q. YOU STATE THAT THE PRE-ORDERING CAPABILITIES OF**  
12 **LENS ARE NOT AVAILABLE TO NEW ENTRANTS**  
13 **SUBMITTING SERVICE ORDERS VIA THE INDUSTRY-**  
14 **STANDARD EDI ORDERING INTERFACE, THE PC BASED EDI**  
15 **ORDERING PACKAGE, OR BY FAX MACHINE IN THE**  
16 **MANNER DESCRIBED BY MS. CALHOUN. PLEASE EXPLAIN.**

17 A. BellSouth's LENS pre-ordering functionality is not integrated with the EDI,  
18 PC EDI, or fax ordering processes. LENS operates in two modes: "Inquiry"  
19 and "Firm Order." The Inquiry mode performs various pre-ordering functions  
20 independently. The Firm Order mode, on the other hand, performs pre-  
21 ordering and ordering functions in a set, integrated process. BellSouth has  
22 suggested that the two modes have different functionalities because the Firm  
23 Order mode is associated with a service order, whereas the Inquiry mode is  
24 not associated with a service order. That simply is not true. Presumably,  
25 BellSouth intends new entrants to use the Firm Order mode of LENS when the

1 new entrant submits its order through LENS, and to use the Inquiry mode  
2 when the new entrant submits its service order through a means other than  
3 LENS (e.g., EDI, PC EDI, or fax). Since BellSouth expects that 80 percent of  
4 all new entrant service orders will be EDI orders, one would anticipate that  
5 most new entrants would use the Inquiry mode. The Firm Order mode offers  
6 different functionality than is available in the Inquiry mode for all pre-  
7 ordering functions, except access to customer service records.

8  
9 BellSouth has suggested that new entrants use the Firm Order mode to avoid  
10 some of the inefficiencies of the Inquiry mode. This is unworkable; neither  
11 mode by itself offers the features and functionalities required for parity. The  
12 Firm Order mode of LENS alone is not a commercially viable pre-ordering  
13 option to new entrants submitting EDI, PC EDI, or faxed orders for the  
14 following reasons:

15  
16 **Address Validation** -- New entrants must validate a customer's  
17 address repeatedly in the Inquiry Mode in order to obtain telephone  
18 numbers, view available features and services, or view the  
19 installation calendar. While the Firm Order mode requires only  
20 one address validation, it doesn't supply other necessary features  
21 and functions as discussed below.

22  
23 **Telephone Numbers** --In the Inquiry mode, LENS limits new  
24 entrants to 100 reserved telephone numbers, or 5 percent of the  
25 available numbers for any given central office. While that

1           limitation does not apply to the Firm Order mode, a new entrant  
2           cannot reserve a number in the Firm Order mode for an EDI, PC  
3           EDI, or fax order: the selected telephone number is released as  
4           soon as the new entrant aborts a particular LENS order. Therefore,  
5           as a practical matter, new entrants must use the Inquiry mode of  
6           LENS to select telephone numbers for EDI, PC EDI, or faxed  
7           orders.

8  
9           **Features and Services** -- In the Firm Order mode, a new entrant  
10          must perform an address validation and select a telephone number  
11          before selecting features and services. Once at the Features and  
12          Services section of the Firm Order mode, a new entrant cannot  
13          view all of the features and services available at a particular central  
14          office. Instead, the new entrant can view only those limited  
15          features and services that can be ordered via LENS. That  
16          limitation does not apply in the Inquiry mode. Therefore, as a  
17          practical matter, new entrants are forced to use LENS in the  
18          Inquiry mode to view feature and services information for EDI, PC  
19          EDI, and faxed orders. In fact, a new entrant using LENS to  
20          submit orders would have to access LENS in the Inquiry mode as  
21          well as the Firm Order mode if a customer wanted information  
22          about a service that could not be ordered through LENS. In other  
23          words, neither mode by itself allows a complete inquiry at all, let  
24          alone on a parity basis.

25

1           **Due Dates** -- In the Inquiry mode, new entrants do not have access  
2           to the essential functionality of BellSouth's Direct Order Entry  
3           Support Applications Program ("DSAP"). According to  
4           BellSouth, DSAP calculates due dates based on an intricate logic  
5           incorporating all variables that can influence due dates. Instead of  
6           providing access to DSAP's intricate logic, the Inquiry Mode of  
7           LENS provides new entrants with an installation calendar that  
8           contains only some of the information that may affect due dates. It  
9           does not calculate the due date or allow a new entrant to reserve a  
10          due date. In contrast, new entrants operating LENS in the Firm  
11          Order mode have access to DSAP, as BellSouth also does when  
12          using its OSS. As a practical matter, however, new entrants cannot  
13          use LENS in the Firm Order mode to obtain due dates for EDI, PC  
14          EDI, or faxed orders. That is because a new entrant must go  
15          through dozens of steps in order to obtain access to DSAP, which  
16          is the last step before submitting a LENS order to BellSouth.  
17          Furthermore, there is no guarantee that a new entrant will be able  
18          to obtain the same due date when submitting an EDI, PC EDI or  
19          faxed service order.

20  
21          BellSouth currently does not offer a pre-ordering interface that is  
22          integrated with the EDI ordering interface. BellSouth touts the industry  
23          standard EDI as its primary ordering interface through which 80 percent of  
24          all service orders will flow, yet new entrants must sacrifice pre-ordering  
25          functionality for the ability to submit orders via EDI.

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As demonstrated above, new entrants operating LENS in the Inquiry mode do not have the equivalent access to pre-ordering functions as new entrants operating in the Firm Order mode or BellSouth operating in its retail environment. Furthermore, it is not practical for new entrants to attempt to use LENS in the Firm Order mode to support EDI, PC EDI, or faxed orders. Consequently, LENS' dual mode design fails to provide nondiscriminatory access to BellSouth's pre-ordering functions for new entrants using the industry EDI ordering interface (an estimated 80 percent of all orders), new entrants using the PC EDI ordering interface, or new entrants faxing orders by choice or by necessity (i.e., where neither LENS nor EDI supports a particular service or network element).

**Q. YOU STATE THAT CONTRARY TO MS. CALHOUN'S CLAIMS, BELLSOUTH DOES NOT PROVIDE NEW ENTRANTS WITH NONDISCRIMINATORY ACCESS TO BELLSOUTH'S ORDERING FUNCTIONS FOR SO-CALLED COMPLEX SERVICES. PLEASE EXPLAIN.**

A. On pages 14-15 and 41-43 of her testimony, Ms. Calhoun suggests that BellSouth provides new entrants with nondiscriminatory access to BellSouth's ordering functions for so-called complex services. That is not true. Ms. Calhoun obfuscates the issue by confusing the pre-ordering process with the ordering process. While BellSouth may manually gather pre-ordering information for complex services, BellSouth has the capability to input orders for complex services directly and electronically

1 into BellSouth's OSS. Nondiscriminatory access requires that new  
2 entrants have the same capability to input orders for complex services  
3 electronically into BellSouth's OSS. It is that simple.

4  
5 As noted in my direct testimony at page 15, the DOJ found that the FCC's  
6 nondiscrimination rules are not limited by the role that any particular OSS  
7 function plays in an RBOC's retail operations. See DOJ SBC Evaluation,  
8 App. A, at 78. In other words, BellSouth must provide new entrants with  
9 the functionality of its OSS and cannot limit the way the new entrant uses  
10 that functionality. For complex services, BellSouth is attempting to limit a  
11 new entrant's use of an OSS function by forcing it to use BellSouth's  
12 process for supporting complex services. Under BellSouth's process, the  
13 BellSouth account team for a particular new entrant will be a bottleneck  
14 that restricts a new entrant's ability to order complex services efficiently,  
15 effectively, and confidentially. If new entrants have direct order entry  
16 capability like BellSouth, however, the new entrants can automate and  
17 eliminate the inefficient manual processes that BellSouth developed in a  
18 monopoly environment, thereby improving customer service. Without  
19 direct order entry capability, BellSouth will be able to hold new entrants  
20 captive to its own inefficient manual processes. This is not what  
21 competition is about.

22  
23 In fact, forcing new entrants to utilize BellSouth's present manual pre-  
24 ordering processes for these so called complex services is discriminatory  
25 even though BellSouth uses the process today. This is true because it



1 denies new entrants the meaningful opportunity to compete by eliminating  
2 the capability to improve upon BellSouth's process. If BellSouth's  
3 process takes four weeks, and a new entrant can perform the process in  
4 three weeks, requiring the new entrant to use BellSouth's process is  
5 discriminatory.

6

7 **Q. YOU STATE THAT MS. CALHOUN CREATED A FALSE**  
8 **IMPRESSION REGARDING THE GEORGIA PSC'S FINDINGS**  
9 **ON LENS. PLEASE EXPLAIN.**

10 A. At page 33 of her direct testimony, Ms. Calhoun created a false impression  
11 that the Georgia PSC somehow found that the LENS design provides new  
12 entrants with access to BellSouth's OSS functions that is equivalent to that  
13 which BellSouth provides itself. However, Ms. Calhoun testified in the  
14 Louisiana 271 proceeding that the Georgia PSC has never found that any  
15 of BellSouth's interfaces comply with the Act or its implementing  
16 regulations. See Louisiana 271 Hearing Transcript at 416 (May 20, 1997).  
17 As explained below, the Georgia PSC never made any such findings. What  
18 the orders of the Georgia PSC do indicate is that LENS is only an interim  
19 interface that does not provide nondiscriminatory access to OSS functions.

20

21 In Docket No. 6352-U, AT&T requested, among other things, that the  
22 Georgia PSC require BellSouth to establish electronic operational  
23 interfaces for OSS functions pursuant to Georgia law. In response to  
24 AT&T's request, on June 11, 1996, the Georgia PSC required BellSouth to  
25 establish the requested interfaces by July 15, 1996. Subsequently, by

1 order dated July 11, 1996, the Georgia PSC established a revised schedule  
2 that required BellSouth to provide some interfaces in the Fall of 1996, and  
3 other interfaces by the Spring of 1997.

4  
5 On December 4, 1996, the Commission issued an order in Docket No.  
6 6801-U, which involved AT&T's arbitration with BellSouth under the  
7 Telecommunications Act. Georgia PSC Order, Docket No. 6801-U (Dec.  
8 4, 1996). In that order, the Georgia PSC found that the interfaces  
9 BellSouth had developed to date complied with its previous orders and,  
10 therefore, would be sufficient to meet AT&T's interim needs. Id. at 23.  
11 The LENS interface was neither developed nor in service on the date of  
12 the order and thus cannot be considered to have been approved by the  
13 Georgia PSC. The Commission also found that AT&T and BellSouth  
14 should continue to work jointly with industry groups to develop standards  
15 for long-term electronic interface solutions. Id.

16  
17 In its Supplemental Order in Docket 6801-U, the Georgia PSC reiterated  
18 that its earlier approval related only to interim interfaces. The Georgia  
19 PSC then adopted permanent interface requirements which mirror those in  
20 the AT&T-BellSouth Florida agreement, and set a completion deadline of  
21 December 31, 1997.

22  
23 In Docket 7253-U, which involved the review of BellSouth's SGAT under  
24 Section 252(f) of the Act, the Georgia PSC referred to LENS as an  
25 "interim" interface. Georgia PSC Order, Docket 7253-U, at 28 (March 21,

1 1997). The Georgia PSC found that "BellSouth has not yet demonstrated  
2 that it is able to provide access to [OSS] on a nondiscriminatory basis that  
3 places CLECs at parity with BellSouth." Id. at 10.

4

5 **Q. YOU STATE THAT BELLSOUTH INCORRECTLY CLAIMS IT IS**  
6 **PROVIDING USEFUL AND TIMELY USAGE DATA. PLEASE**  
7 **EXPLAIN.**

8 A. At page 54 of her direct testimony, Ms. Calhoun claims that BellSouth is  
9 providing useful and timely usage data. That is not accurate. BellSouth  
10 Witness Milner has acknowledged that BellSouth currently cannot  
11 generate a mechanized bill for local switching usage. Milner Direct at 21.  
12 In addition, BellSouth cannot record and transmit all of the usage data that  
13 new entrants require to bill access and mutual compensation in a network  
14 element or facilities-based environment. This recorded data is required  
15 not only for billing by CLECs, but also for conducting usage studies,  
16 market analysis and forecasting, as BellSouth is able to do. Without this  
17 capability, BellSouth cannot provide nondiscriminatory access to its OSS  
18 for billing functions.

19

20 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.**

21 A. BellSouth has proposed a patchwork of interfaces that do not provide new  
22 entrants with nondiscriminatory access to BellSouth's OSS functions. For  
23 example, BellSouth proposes LENS for pre-ordering functions, but LENS  
24 is not compatible with the EDI ordering interface, which is the standard  
25 recognized by the telecommunications industry for ordering functions. In

1 fact, a new entrant must sacrifice some of the pre-ordering functionality  
2 available in LENS in order to use the EDI ordering interface. Most new  
3 entrants' orders will use the industry standard EDI ordering interface  
4 despite these limitations. Even though it provides integrated pre-ordering  
5 capabilities, BellSouth admits that the LENS ordering functionality is  
6 discriminatory. The work-arounds (both automated and manual) that  
7 BellSouth has floated to compensate for deficiencies of its interfaces are  
8 not viable in any commercial sense. In any event, BellSouth does not  
9 meet the Act's requirements for nondiscrimination even if a new entrant  
10 could take some extraordinary efforts to somehow make BellSouth's  
11 proposed interfaces barely adequate. For these reasons and the reasons set  
12 forth in my direct testimony, the Florida Commission should find that  
13 BellSouth's proposed OSS interfaces do not yet comply with the  
14 provisions of Section 251 of the Act. Specifically, the Commission should  
15 make a negative determination for Issues 2, 3, 3(a), 10, 15 and 15(a).

16

17 **Q. DOES THAT COMPLETE YOUR REBUTTAL TESTIMONY?**

18 **A. Yes.**