



VIA HAND DELIVERY

Box 2214
Tallahassee, Florida 32316

July 31, 1997

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

Re: Docket No. **960786-TL** Consideration of BellSouth
Telecommunications, Inc.'s entry into InterLATA
services pursuant to Section 271 of the Federal
Telecommunications Act of 1996.

Dear Ms. Bayo:

Please find enclosed for filing, an original and fifteen copies of the Rebuttal
Testimony of Melissa L. Cloz filed on behalf of Sprint Communications
Company Limited Partnership and Sprint Metropolitan Networks, Inc. in the
above proceeding.

Please acknowledge receipt and filing of the above by stamping the duplicate
copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Sandra A. Khazraee

for Benjamin W. Fincher

BWF/th

cc: Parties of Record
C. Everett Boyd

Enclosures

RECORDED FILED
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07777 JUL 31 5

FPSC-RECORDS/REPORTING

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET 960786-TL
JULY 31, 1997

SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP
SPRINT METROPOLITAN NETWORKS, INC.

REBUTTAL TESTIMONY OF MELISSA L. CLOSZ

DOCUMENT NUMBER-DATE

07777 JUL 31 5

FPSC-RECORDS/REPORTING

1 Q. PLEASE STATE YOUR NAME AND ADDRESS.

2

3 A. My name is Melissa L. Cloz. My business address is 151 Southall Lane, Maitland,
4 Florida 32751.

5

6 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

7

8 A. I am employed by Sprint Communications Company Limited Partnership. ("Sprint") as
9 Director- Local Market Development.

10

11 Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

12

13 A. I am testifying on behalf of Sprint Communications Company Limited Partnership and
14 Sprint Metropolitan Networks, Inc.

15

16 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK
17 EXPERIENCE.

18

19 A. I have a Master of Business Administration degree from Georgia State University in
20 Atlanta, Georgia and a Bachelor of Business Administration degree from Texas
21 Christian University in Fort Worth, Texas. I have been employed by Sprint for over
22 six years and have been in my current position since February, 1997. Previous
23 positions within the Local Telecommunications Division of Sprint include General

1 **Manager of Sprint Metropolitan Networks, Carrier Markets Manager of Sales and**
2 **Technical Support and General Manager of United Telephone Long Distance- Florida.**
3 **Within Sprint's Long Distance Division, I served as Group Manager- Market**
4 **Management and Customer Support for the Intermediaries Marketing Group. Prior to**
5 **joining Sprint, I was employed by AT&T for five years in various sales and sales**
6 **management positions within their long distance division. I also owned and operated a**
7 **consumer marketing business for two years.**

8
9 **Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?**

10
11 **A. My present responsibilities include representation of Sprint and SMNI in**
12 ***interconnection negotiations with BellSouth Telecommunications, Inc. ("BellSouth").***
13 **In addition, I am responsible for coordinating Sprint's entry into the local markets**
14 **within BellSouth's states. I also interface with BellSouth's account team supporting**
15 **Sprint to communicate SMNI's service and operational issues and requirements.**

16
17 **Q. What is the purpose of your rebuttal testimony?**

18
19 **A. The purpose of my rebuttal testimony is to respond to BellSouth's direct testimony**
20 **filed July 7, 1997 relative to docket No. 960786-TL. Specifically, I will provide**
21 **comments relative to BellSouth's ability to provide nondiscriminatory access to its**
22 **Operational Support Systems (OSS) as well as the status of performance**
23 **measurements.**

1

2 Q. What issue would you like to address first?

3

4 A. I will address Operational Support Systems, or OSS.

5

6 Q. PLEASE SUMMARIZE SPRINT'S PERSPECTIVE ON THE REQUIREMENT
7 FOR BELL SOUTH TO PROVIDE NONDISCRIMINATORY ACCESS TO ITS
8 OSS.

9

10 A. Sprint believes that nondiscriminatory access to OSS means more than publishing
11 descriptions of system functionality. Rather, the evaluation of whether BellSouth has
12 met the test of providing nondiscriminatory access to OSS can only take place in a
13 "real world" operating environment where ALEC customers are being supported.
14 This forum provides the "test" of whether the OSS are performing as promised and
15 additionally provides the raw data necessary to evaluate, via performance
16 measurements, whether the ALEC customers' experience is at parity with what
17 BellSouth provides its own customers.

18

19 Sprint's primary concerns about the OSS introduced to date by BellSouth are that: (1)
20 the interfaces introduced to date are not fully deployed and tested; and (2) they are
21 interim solutions.

22

1 Q. MS. CALHOUN STATES ON PAGE 17 LINE 17 OF HER DIRECT TESTIMONY
2 THAT "EACH INTERFACE IS FULLY OPERATIONAL, AND IS IN ACTUAL
3 USE." DO YOU AGREE WITH THIS STATEMENT?

4

5 A. No. As stated in my direct testimony, the interfaces introduced to date only support
6 certain products, features and service order parameters. Many enhancements are
7 planned that will fill these gaps in functionality. But until these enhancements are
8 introduced and tested in a "real world" operating environment, it will be impossible to
9 assess their ability to provide parity with what BellSouth experiences in providing
10 service to its own customers.

11

12 Q. PLEASE PROVIDE A FEW EXAMPLES.

13

14 A. Ms. Calhoun states on page 32 lines 6-7 of her direct testimony that "On-line access to
15 customer service record information is available through LENS." Sprint understands
16 that this capability was just announced in late June and is in the process of securing
17 access to LENS to explore this functionality. However, as referenced in my direct
18 testimony, Ms. Calhoun fails to reference several limitations in this functionality that
19 do not provide parity with what BellSouth experiences for itself. These limitations
20 include, by way of example, the inability to print more than one screen of customer
21 service record information at a time and the inability to view more than 50 pages of the
22 customer's record. For the latter, a phone call to the BellSouth Local Carrier Service
23 Center (LCSC) is required to obtain the additional pages in the record. These

1 differences in functionality result in reduced efficiency in responding to customer
2 requirements because of the additional time needed to acquire customer-specific
3 information. Within SMNI, as an example, this reduced functionality will mean that
4 the business customers that SMNI seeks to serve will need to be placed on hold or
5 called back in order for the SMNI sales representative to provide an accurate service
6 price quote and installation date for customers that would like to replicate their
7 existing BellSouth service.

8
9 This access to pre-order information, as stated in my direct testimony, is critical to
10 providing accurate service pricing information and other service recommendations.
11 Ms. Calhoun, however, continues in her testimony (page 19, lines 13-18) to state that
12 "There is a limited need for pre-ordering information for orders involving existing
13 customers who already have telephone numbers and installed services and who just
14 want to switch service providers." Sprint's experience in Florida and in other states
15 continues to reinforce the importance of real time, interactive access to this
16 information. SMNI, as an example, initially established service for some customers
17 prior to reviewing the customer's service record. Experience showed, however, that
18 many customers do not know what services and/or features that they have, and that
19 their telephone bill does not adequately detail the service configuration to enable
20 replication of existing services. Only a complete review of the customer service record
21 enables SMNI to insure that the service is configured, provisioned and billed
22 accurately.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

As another example, Ms. Calhoun states on page 20 and 21 of her direct testimony that the LENS interface “offers ALECs real-time, interactive access to pre-ordering information, and an integrated direct order entry capability...”. Sprint’s understanding is that the integrated order capability exists only for certain resale services supported by LENS and is not available for unbundled network elements.

While Ms. Calhoun states (page 38, line 25) that certain unbundled network elements can be ordered via LENS, Sprint’s understanding is that this capability is the functional equivalent of submitting these orders via facsimile and that actual on-line ordering for unbundled network elements will not be introduced until some point in the future. As such, there is no integrated pre-order and direct order capability available via LENS for ALECs provisioning service via unbundled network elements.

Moreover, SMNI has been asking BellSouth for electronic capabilities for unbundled network element provisioning since October, 1996. This request led to SMNI’s adoption of the EXACT interface for transmittal of unbundled loop orders. SMNI is now aware, through Ms. Calhoun’s testimony, page 38, lines 17-25, of BellSouth’s claim that certain unbundled network elements can ordered via EDI. SMNI has requested more information from BellSouth about this new capability to understand its potential application to SMNI and opportunities for improved efficiency.

1 Q. PLEASE COMMENT ON GAPS IN MAINTENANCE AND REPAIR
2 OPERATIONAL SUPPORT SYSTEM FUNCTIONALITY AS CURRENTLY
3 PROVIDED BY BELLSOUTH.

4

5 A. In Gloria Calhoun's direct testimony, she describes OSS interfaces which BellSouth
6 has made available to ALECs in support of maintenance and repair activities. While
7 certain functionality is supported through these interfaces, there are numerous gaps
8 which create an operationally cumbersome environment for new entrants.

9

10 Q. PLEASE PROVIDE A FEW EXAMPLES.

11 A. In Gloria Calhoun's direct testimony, page 50, lines 1-6, Ms. Calhoun states that
12 "...Even for trouble reports on complex services that involve exchange services... an
13 ALEC can use TAFI to input trouble reports... A(n) ALEC also can use TAFI in this
14 manner to report troubles associated with unbundled network elements that can be
15 identified with a telephone number, such as unbundled ports or interim number
16 portability." In Ms. Calhoun's Rebuttal Testimony, filed in Georgia Section 271
17 proceedings 7/11/97, page 11, lines 8-9, Ms. Calhoun further states that, "TAFI is the
18 "appropriate" system for any telephone-number based service, whether resale or
19 unbundled network element."

20

21 However, as stated in my direct testimony, Sprint has been advised that trouble
22 reporting for unbundled ports or interim number portability via TAFI is functionally
23 equivalent to sending a facsimile transmission since human intervention will be

1 required to retrieve the information and re-enter such troubles into the underlying
2 BellSouth system(s) associated with these unbundled network elements. This
3 introduction of human intervention into the trouble reporting process creates
4 substantial opportunity for error and differentiates the process itself from “the time and
5 manner as BellSouth has access for its retail customers.”

6

7 Q. PLEASE PROVIDE A SUMMARY OF SPRINT’S PERSPECTIVE ON THE
8 STATUS OF PERFORMANCE MEASUREMENTS AS PRESENTED BY
9 BELLSOUTH WITNESS STACY.

10

11 A. In general, Sprint believes that witness Stacy’s direct testimony is entirely supportive
12 of Sprint’s assertion that performance measurement identification and tracking is in a
13 highly developmental state.

14

15 Q. PLEASE PROVIDE A FEW EXAMPLES.

16

17 A. Mr. Stacy admits on page 6, lines 7-9, that BellSouth has only reached agreement on
18 performance parameters to be measured with AT&T. “...no other agreements have
19 been finalized...” In addition, on line 15, Mr. Stacy further states that not all
20 reporting requirements have been finalized with AT&T.

21

22 Sprint believes that this status provides tangible evidence that the ability to use fact-
23 based tools to assess BellSouth’s ability to meet nondiscriminatory access and parity

1 standards is extremely limited at this point in time. Sprint views such performance
2 measurement documentation as an essential part of parity consideration. These
3 measurements should compare BellSouth's internal standards to BellSouth's support
4 of its affiliates, the ALEC industry and individual ALECs. This is the only basis upon
5 which nondiscriminatory treatment can be measured.

6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

8

9 A. Yes, it does.

10

11

12

13

14

15