

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of : 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. :



THIRD DAY - MORNING SESSION

VOLUME 11

Pages 1207 through 1303

PROCEEDINGS: HEARING

BEFORE: CHAIRMAN JULIA L. JOHNSON
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER DIANE K. KIESLING
COMMISSIONER JOE GARCIA

DATE: Thursday, September 4, 1997

TIME: Commenced at 9:20 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JOY KELLY, CSR, RPR
Chief, Bureau of Reporting
H. RUTHE POTAMI, CSR, RPR
Official Commission Reporters

APPEARANCES:

(As heretofore noted.)

DOCUMENT NUMBER - DATE
08930 SEP-4 97
FPSC-RECORDS/REPORTING

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25**WITNESSES - VOLUME 11**

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EXHIBITS - VOLUME 11

| NUMBER | | ID. | ADMTD. |
|---------------|-----------------------------------|------------|---------------|
| 43 | GC-32 | 1215 | |
| 44 | BellSouth Florida PSC Briefing | 1215 | |
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P R O C E E D I N G S

(Hearing reconvened at 9:20 a.m.)

(Transcript follows in sequence from
Volume 10.)

CHAIRMAN JOHNSON: It will take us a few more moments to get started. We're still putting together some of Ms. Calhoun's exhibits. Maybe just five to ten more minutes.

MS. WHITE: I do apologize for the mix up. We were trying to get the information out as fast as we could, and I think that accuracy may have been sacrificed in the interest of speed, and we're trying to fix that. And we do apologize to everyone, especially the Staff and the Commission.

CHAIRMAN JOHNSON: Okay.

(Brief recess.)

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CHAIRMAN JOHNSON: We're going to go back on the record.

MS. KAUFMAN: Chairman Johnson, we do have one preliminary matter to take up and that deals with the order of witnesses.

I've discussed this with Staff and BellSouth and some of the parties. And in the event that we finish Ms. Calhoun and Mr. Stacy today, I don't know

1 if that's going to happen or not, but if we do and you
2 decide you want to continue with the hearing, we would
3 suggest we take Mr. Hamman out of order if you want to
4 go this evening.

5 We would also suggest, though, that we're
6 making pretty good time and you might want to consider
7 concluding today's hearing when we conclude with
8 BellSouth's case. But if you don't want to do that,
9 you want to go on to another witness, we would suggest
10 we take Mr. Hamman, who is AT&T's witness. Then when
11 we come in tomorrow morning, if there's a need for
12 Mr. Scheye to come back on the stand, which is not
13 clear to me now, and we will resolve that before the
14 end of the day, if he does need to come back, take him
15 first thing Friday morning and then move to Mr. Gillan
16 and continue with the order that's set out in the
17 Prehearing Order.

18 **CHAIRMAN JOHNSON:** So the change would just
19 be to take Hamman before Gillan?

20 **MS. KAUFMAN:** Only if you feel the need to
21 continue and take a witness tonight. If you do not,
22 we would suggest that we just commence with Mr. Scheye
23 tomorrow, if that's necessary, and then just go back
24 to the regular order as it is set out.

25 **CHAIRMAN JOHNSON:** Okay. So you don't want

1 to break up Gillan tonight.

2 MS. KAUFMAN: No, ma'am.

3 CHAIRMAN JOHNSON: We'll just see how much
4 we can get done today and make a determination on
5 that. I would agree we wouldn't want to break up
6 Mr. Gillan. Isn't he here? I saw him yesterday,
7 didn't I?

8 MS. KAUFMAN: He's in Tallahassee. He will
9 not be in the hearing today.

10 CHAIRMAN JOHNSON: He won't be here today?

11 MS. KAUFMAN: No, ma'am.

12 CHAIRMAN JOHNSON: Okay.

13 MS. KAUFMAN: Thank you.

14 COMMISSIONER CLARK: Madam Chair, can I ask
15 a question? Why do you think we don't need to go
16 tonight? Do you have an estimate on how much time we
17 need for the rest of the hearing?

18 MS. KAUFMAN: I do not have an estimate.
19 And I think it's going to depend on how long
20 Ms. Calhoun and Mr. Stacy take, but I think that if we
21 finish them this evening, it's my estimate that we are
22 moving quickly. But I was just offering to sort of
23 have a contingency plan; that if you do want to
24 continue that Mr. Hamman would be available.

25 COMMISSIONER CLARK: Thank you, Madam

1 Chairman.

2 **CHAIRMAN JOHNSON:** I think we'll have a
3 better feel to that, but I think given -- I think
4 Hamman would be better to take tonight if we could,
5 not saying whether we will or not, but Hamman would be
6 better than Gillan.

7 **COMMISSIONER KIESLING:** Could I get -- while
8 we're talking about scheduling -- get some
9 clarification. Do we know yet whether we're going to
10 have to work on Saturday?

11 **CHAIRMAN JOHNSON:** At the rate we're going
12 now I don't think we'll have to work on Saturday. We
13 did not schedule any witnesses for Saturday.

14 **COMMISSIONER KIESLING:** Especially since
15 this is going to be the first beautiful, somewhat fall
16 day we may have; supposed to be low humidity, all sun
17 and low 80s all weekend.

18 **COMMISSIONER CLARK:** Gosh, I bet we could
19 get a lot done on Saturday. (Laughter)

20 **COMMISSIONER DEASON:** And it's my
21 understanding that if the parties could get back with
22 us on the witnesses that will be stipulated, it was my
23 understanding there may be a few more. One more.

24 **MS. WHITE:** We had agreed to stipulate in
25 Mr. Kaserman, and I believe -- I don't know whether

1 the Staff agreed to that or not.

2 MS. BARONE: Yes.

3 CHAIRMAN JOHNSON: We'll handle those later.
4 Perhaps, Staff, you could confer with the parties and
5 kind of gauge how much time the other witnesses will
6 take for direct, redirect and cross, that sort of
7 thing, then we'll have a better feel. But I don't
8 anticipate that we'll need to work this Saturday.

9 COMMISSIONER KIESLING: Thank you.

10 MS. WHITE: As a housekeeping matter
11 BellSouth filed its written response to the Joint
12 Movants Motion to Strike the Statement of Generally
13 Available Terms this morning. And the parties all
14 have that and I believe the Commissioners also have a
15 copy.

16 CHAIRMAN JOHNSON: I'm going to give the
17 Commissioners an opportunity to review that and meet
18 with Staff and then we'll make a determination as to
19 when we'll actually hear the oral argument on those
20 motions. And the parties also have to have an
21 opportunity to review the document.

22 MS. RULE: I think we probably would be
23 ready to argue Friday if you wanted to hear it. It
24 might be better to do it Monday. I haven't really
25 considered that. I haven't personally had a chance to

1 read it yet.

2 CHAIRMAN JOHNSON: But you are comfortable
3 arguing it Friday?

4 MS. RULE: If you'd prefer to hear it then,
5 that's when we'll do it. That will be fine.

6 CHAIRMAN JOHNSON: Any other preliminary
7 matters? Ms. Barone.

8 MS. BARONE: If there are no other
9 preliminary matters, I have a couple of exhibits to be
10 marked for identification at this time.

11 The first one is identified as GC-32 which
12 consists of Ms. Calhoun's deposition transcript, her
13 late-filed depositions exhibits and confidential
14 late-filed deposition exhibits. Madam Chairman, we
15 ask that exhibit GC-32 be marked as Composite
16 Exhibit 43 at this time.

17 CHAIRMAN JOHNSON: We'll mark it as
18 Composite 43.

19 COMMISSIONER KIESLING: Could I get a
20 clarification? I my list I have that GC-32 is part of
21 Exhibit 42.

22 MS. BARONE: Let me check one thing. Thank
23 you. We can still identify that as 43. Our cover
24 sheet did say GC-32 but our exhibit should have begun
25 with 33.

1 (Composite Exhibit 43 marked for
2 identification.)

3 COMMISSIONER KIESLING: Thank you.

4 MS. BARONE: And I would like to note to the
5 Commissioners that we've also passed out revision
6 pages to that exhibit, and I believe everyone has a
7 copy of that as well and that will be included in the
8 packet as well. You'll see at the bottom 382-R, all
9 of these pages are revised to the existing packet.

10 The second exhibit consists of handouts from
11 August 14th, 1997, BellSouth Florida PSC Briefing, and
12 Staff would ask that that be marked as Exhibit 44 at
13 this time.

14 CHAIRMAN JOHNSON: Mark that as 44.

15 (Exhibit 44 marked for identification.)

16 MS. BARONE: Thank you. That's all I have.

17 CHAIRMAN JOHNSON: And you want that one as
18 GC-34.

19 MS. BARONE: Yes, ma'am.

20 CHAIRMAN JOHNSON: Perhaps you explained
21 this, but what did you say the other loose text
22 document was?

23 MS. BARONE: Those are revised pages to what
24 is now identified as Exhibit No. 43.

25 CHAIRMAN JOHNSON: Okay. I just had it

1 attached to the wrong -- thank you.

2 MS. BARONE: Thank you.

3 CHAIRMAN JOHNSON: Is the witness prepared
4 for cross?

5 MR. ELLENBERG: Yes. Madam Chairman, we
6 tender the witness for cross examination.

7 MS. KAUFMAN: I have no questions, Chairman
8 Johnson.

9 CHAIRMAN JOHNSON: Ms. Wilson.

10 MS. WILSON: No questions.

11 MR. MELSON: Commissioner Johnson, my
12 upstream colleagues had indicated they didn't have a
13 problem if I went first. I think Mr. Willingham may
14 have some questions but probably would come better
15 after I complete my cross, if that's acceptable.

16 CHAIRMAN JOHNSON: That will be fine.

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1 Q And for purposes of discussing the way
2 BellSouth proposes to meet those requirements, you've
3 combined ordering and provisioning; is that correct?

4 A Yes.

5 Q Looking at Exhibit 28, for preordering Bell
6 offers the local exchange navigation system, or LENS;
7 is that correct?

8 A Yes.

9 Q And is it fair to say LENS is not an
10 industry standard?

11 A Yes. There is no industry standard for
12 preordering.

13 Q Let's move to ordering and provisioning.
14 What is the industry standard for ordering resold
15 services and UNes?

16 A The industry recommends EDI, or electronic
17 data interchange for CLEC ordering for those services.

18 Q And is it EDI that BellSouth is relying on
19 to meet its obligation to provide nondiscriminatory
20 access to ordering and provisioning functions?

21 A It's a combination of EDI and the system
22 known as EXACT. I should clarify my previous answer.

23 There are some unbundled network elements
24 that the industry has defined EDI as the appropriate
25 ordering vehicle for, and those are the ones that tend

1 to be more end-user related; things like an individual
2 unbundled port or an unbundled loop.

3 There are also -- there's a group of
4 unbundled network elements that I think I described in
5 my summary as more infrastructure related; things that
6 don't relate to a particular end user but things like
7 collocation arrangements or tandem switching are
8 examples.

9 So those unbundled elements or
10 interconnection trunking is probably the prime example
11 there. And the industry standard, ASR process
12 supported through the EXACT system, is used for those;
13 is recommended by the industry for those.

14 Q Ms. Calhoun, maybe you could pull your
15 microphone about half an inch closer. You're just a
16 little hard to hear.

17 BellSouth also provides ordering and
18 provisioning of some services through LENS; is that
19 correct?

20 A That's correct.

21 Q But if I understand correctly, you're not
22 relying on LENS as a method of demonstrating
23 compliance with nondiscrimination standards for
24 ordering; is that right?

25 A For ordering and provisioning, that's

1 correct. The primary purpose of LENS is as a
2 preordering interface. We've also made an ordering
3 capability available through it, but the industry
4 standard is EDI interface and that's what BellSouth
5 provides for its nondiscriminatory access for ordering
6 and provisioning.

7 Q Now, if I could ask you, do you have a copy
8 of the handout of the slides that you used yesterday
9 during your summary?

10 A I think that's probably the one document I
11 don't have in front of me but if you'll give me just a
12 minute I can locate one. (Pause)

13 MR. MELSON: We found one for you.

14 Chairman, for purposes of identification I'd
15 like to ask that we mark this three-page document, if
16 we could, as Exhibit 45.

17 CHAIRMAN JOHNSON: It will be marked as
18 Exhibit 45.

19 (Exhibit 45 marked for identification.)

20 Q (By Mr. Melson) Ms. Calhoun, could you
21 turn to Page 2 of Exhibit 45, which is a slide showing
22 "CLEC OSS Access."

23 A Yes.

24 Q I believe you told us yesterday the EDI box
25 that's shown on that side is something you called an

1 EDI translator; is that correct?

2 A Yes.

3 Q Would there also be an EDI translator of
4 BellSouth's, either at the box that's labeled
5 "Navigator" or before you get to the box that is
6 labeled "Navigator"?

7 A No. The EDI translator that is shown here
8 is BellSouth's EDI translator.

9 Q All right. So does a CLEC need an EDI
10 translator as well?

11 A Yes.

12 Q So the oval that shows CLEC includes the
13 CLEC's EDI translator within that oval then?

14 A Yes.

15 Q And that EDI translator was the -- could be
16 the Harbinger software you mentioned yesterday during
17 your summary?

18 A Yes. The Harbinger software includes as
19 part of its functionality the translation function.

20 Q If I understand EDI correctly, EDI simply
21 says we're going to have two people using different
22 systems passing information back and forth and we want
23 to structure the way that information is passed so
24 that it's in a common format, and I know what
25 information to look for first, and how long the record

1 should be, what type of information is valid for that
2 segment of the record and so forth. Is that a fair
3 summary?

4 A At a very high level, yes.

5 Q If any of my questions require a more
6 detailed answer, then let me know and I'll ask you for
7 a more detailed summary. But I think that will
8 suffice for purposes, I believe, of the questions I'm
9 going to ask.

10 Who determines the standard for that message
11 that goes from one EDI translator to another?

12 A The industry standards setting bodies, to a
13 large extent, make that determination.

14 Q And in the case of ordering for CLECs, is
15 that the OBF, or Ordering and Billing Forum?

16 A That's one of the committees that is
17 involved. There are a number of industry committees
18 that have input.

19 Q Have the industry committees defined a
20 number of standard message types for use by CLECs
21 ordering resold services and UNES?

22 A Yes.

23 Q Has BellSouth implemented all of the message
24 types that have been agreed upon by the standards
25 bodies?

1 A BellSouth has implemented everything that is
2 in -- let me back up.

3 There are different versions approved by the
4 standard setting bodies. Until the last six weeks or
5 so, the current version was Version 6. And
6 BellSouth's implementation is based on primarily
7 Version 6, and on some aspects of Version 7, which was
8 just approved.

9 BellSouth has agreed in its interconnection
10 agreements with AT&T and MCI to specific time periods
11 from the time a new standard is adopted, and has
12 agreed on a particular length of time, which, if
13 memory serves me, is about seven months. So while
14 BellSouth has moved forward with the implementation of
15 Version 7, and what BellSouth knew was going to be in
16 Version 7, we're very early in that process with the
17 industry bodies just having approved that.

18 I apologize for that long-winded answer
19 but --

20 Q I apologize for hitting my microphone.

21 Let's move on from provisioning now for a
22 moment to repair and maintenance.

23 For repair and maintenance I understand
24 BellSouth relies -- strike that.

25 What does BellSouth rely on to meet its

1 nondiscriminatory obligation for providing access to
2 repair and maintenance?

3 A BellSouth realized on a combination of two
4 interfaces. The first is the TAFI interface that I
5 described yesterday, and that is the same
6 functionality that BellSouth has available for its
7 retail exchange services. There are a number of
8 services that are not supported by TAFI, either for
9 BellSouth retail customers or for CLECs. And those
10 are supported through an interface -- an electronic
11 bonding interface that has been used for a number of
12 years by interexchange carriers. And that for
13 shorthand I call the T1M1 interface in honor of the
14 committee that developed the standards for it.

15 Q So looking at your Exhibit 28, what's
16 described there under maintenance repair, the second
17 bullet is industry standard; electronic gateway is
18 what you refer to as the T1M1 interface?

19 A Yes.

20 Q Is TAFI an industry standard?

21 A No. There is no industry standard for the
22 functionality that is provided by TAFI. Functionality
23 available through TAFI is far superior to what the
24 industry defines -- the industry defines a much lower
25 level of functionality in terms of exchanging

1 information about a trouble report.

2 But the diagnostic capability and the
3 trouble clearing capabilities that are available in
4 TAFI are used by BellSouth, therefore, we're providing
5 them to allow CLECs to operate in substantially the
6 same time and manner we do, but they are not defined
7 by any industry standard.

8 Q Are there some carriers that have indicated
9 to BellSouth an interest in using an industry standard
10 interface for all aspects of maintenance and repair?

11 A Yes. And BellSouth is in the process of
12 building a trouble reporting interface for those
13 services not currently supported by the T1M1 interface
14 that would allow that lower level of functionality to
15 be exchanged in an industry standard manner for resold
16 services. And BellSouth is in the process of building
17 that. Nonetheless, to allow CLECs to operate in
18 substantially the same time and manner as BellSouth
19 serves its retail customers, BellSouth is making
20 available the higher level of functionality available
21 through TAFI since that's what we use ourselves.

22 Q Let me ask this: Is TAFI -- would you
23 describe TAFI as an ALEC machine-to-BellSouth machine
24 interface?

25 A No.

1 Q Would you describe the industry standard as
2 an ALEC machine-to-BellSouth machine interface?

3 A Yes, but for a different type of
4 functionality.

5 Q Now, let me ask you -- since I've used some
6 confusing terminology -- tell me what you understand
7 the ALEC machine-to-BellSouth machine interface to
8 mean?

9 A When we talk about a machine-to-machine
10 interface, generally what we're talking about is the
11 exchange of computer information in a form that's
12 recognized by computers but not a form that's
13 recognized by humans.

14 What you see with TAFI when you use TAFI are
15 screens that are intelligible to a human being who is
16 going to use those systems. A machine-to-machine
17 interface, if you have ever had the experience of
18 looking at the characters and symbols in a computer
19 file that just appear on a screen that aren't
20 particularly meaningful, that's computer language
21 coming through. And so a machine-to-machine interface
22 is data being exchanged in a computer language as
23 opposed to one that is intelligible to humans.

24 COMMISSIONER CLARK: Mr. Melson, can I ask a
25 question? Is that what AT&T has asked you to do?

1 **WITNESS CALHOUN:** To provide a
2 machine-to-machine interface? Yes.

3 **COMMISSIONER CLARK:** And you're working with
4 them to do that?

5 **WITNESS CALHOUN:** Yes.

6 **COMMISSIONER CLARK:** As I recall, you said
7 it's an expensive proposition that you suppose an
8 entity as large as AT&T would want, but the other
9 ALECs would not be interested in that, and they would
10 still want to use your TAFI.

11 **WITNESS CALHOUN:** Right. In technical terms
12 what is being -- what you see on the screen is called
13 a presentation system, and AT&T prefers to build its
14 own presentation system to let its users see what they
15 want it to see. What we've provided is identical to
16 what our repair attendants see.

17 **Q** **(By Mr. Melson)** Let me follow up on that
18 just a minute. Let me ask this: Is an industry
19 standard machine-to-machine interface used today for
20 maintenance and repair in the interexchange industry?

21 **A** Yes. By the two largest carriers.

22 **Q** AT&T and MCI?

23 **A** As far as I know those are the two largest.

24 **Q** I was just checking to make sure we weren't
25 talking past each other.

1 Is a reason that a large carrier might want
2 to use a machine-to-machine interface not only so that
3 it sees a uniform presentation screen no matter what
4 BOC it's dealing with throughout the country, but also
5 so that when it enters information into the system, it
6 can have some of that information go over the
7 interface to the BOC and other information go into its
8 own recordkeeping systems?

9 A That's possible. Once you have the
10 information in a computer format, you can do with it
11 whatever you choose to do.

12 Q And TAFI doesn't offer an opportunity
13 without building some front end in front of that for
14 the user -- for the ALEC to take the TAFI information
15 and use it in their own internal systems; is that
16 correct?

17 A That's correct. But one of the things I
18 pointed out yesterday was that the maintenance history
19 recordkeeping function is done as part of the TAFI
20 functionality. So while an ALEC might choose to have
21 a separate system, it's not a necessary thing.

22 Q If an ALEC wanted an opportunity to generate
23 summary reports of all of the troubles it had
24 reported, is that something it could get through TAFI?

25 A I'm not certain. I'd have to check.

1 Q And if I understood correctly, the industry
2 standard that Bell is moving toward implementing, the
3 T1M1, is it my understanding that T1M1 interface is in
4 place today for some services that a CLEC would use
5 but not all of those services.

6 A I'm having a little bit of trouble with your
7 question because when you said we're moving towards
8 implementing the T1M1 interface, the T1M1 interface
9 already is available. It's been used since 1995, I
10 believe, but interexchange carriers. And the T1M1
11 interface can be used for any trouble -- any service
12 that is identified with a circuit number. TAFI can be
13 used for any trouble that's identified with a
14 telephone number. And that leaves trouble identified
15 with a circuit number. Those could be handled via the
16 T1M1 interface.

17 Q And a trouble identified with a telephone
18 number would be a residential service and most simple
19 business services; is that correct?

20 A Those are part of the services. But there
21 are unbundled network elements that can be identified
22 with the telephone number, such as an unbundled port,
23 or interim number portability, PBX trunks or ESSX
24 station lines can be identified with a telephone
25 number, and those can be reported through TAFI as

1 well.

2 Q And did I understand that Bell is working
3 with AT&T to expand the T1M1 interface so that it also
4 can be used for services that use a telephone number
5 rather than a circuit number?

6 A Yes.

7 Q Let's move to the last box on your
8 Exhibit GC-28, billing. And in the functions you
9 describe a daily file containing such items as
10 directory assistance or other billable usage
11 associated with a resold line, interim number
12 portability account, or unbundled network elements
13 such as unbundled port.

14 Let me ask you, does the billing file
15 provide -- that you describe include information on --
16 let me start over again.

17 Assume that an ALEC has ordered an unbundled
18 port and has connected its own loop to that unbundled
19 port. Does the daily file for the unbundled port
20 provide the ALEC with the information necessary to
21 identify what interexchange carriers have originated
22 or terminated interexchange calls to the customer
23 connected to that port?

24 A I'm not sure I totally understand your
25 question. Could you try me again?

1 Q Are you familiar with access charges?

2 A Yes. Let me say that the billable usage
3 file is for local billable usage.

4 Q And not for access billable usage?

5 A That's right.

6 Q Okay?

7 A Access usage -- that's right. It's for
8 local usage.

9 Q What system would a BellSouth customer
10 representative use for preordering and ordering for
11 residential service in Florida?

12 A For most residential services a service
13 representative would use primarily a system known as
14 RNS, or the regional negotiation system, and would use
15 a system known as BOCRIS to view customer service
16 record information.

17 Q And what system or systems would a BellSouth
18 customer representative use for preordering and
19 ordering for a business service in Florida?

20 A It would depend on the particulars of the
21 service. If we could narrow the example to, say, a
22 flat rate business line; complex services are handled
23 differently. It would primarily use a system known as
24 the DOE system, D-O-E, and also would look at customer
25 record information through a system known as BOCRIS.

1 Q And even for complex services when you got
2 to the end of the day and were entering the order into
3 BellSouth's system, would the customer services
4 representative use DOE, D-O-E, to enter that order?

5 A When you say at the end of the day, and that
6 sounds pretty quick. Complex services -- the reason I
7 made the distinction is, first of all, we're talking
8 about preordering and ordering.

9 Most of the preordering and ordering
10 activities that take place for complex services are
11 done manually with the involvement of systems
12 designers and project managers and various members of
13 BellSouth's account teams. And that process can
14 proceed over a period of a number of weeks.

15 So I would say in answer to your question,
16 not at the end of the day, but at the end of that
17 process which could happen over a number of weeks,
18 yes, a BellSouth service order typist would actually
19 put that order into the DOE system.

20 Q Thank you. Let me focus for a minute on
21 what can be ordered through the various systems we
22 have been talking about.

23 Could you turn to your prefiled
24 Exhibit GC-19, which is part of Exhibit 41. Now, is
25 that a list of the services that can be ordered by an

1 ALEC using the EDI interface?

2 A Using -- excuse me, which interface.

3 Q EDI?

4 A No. This is not a complete list of services
5 that can be ordered via EDI. This is the list of
6 services that have mechanized order generation that
7 can be ordered via EDI but also have mechanized order
8 generation on BellSouth's side of the interface,
9 meaning that the order flows into BellSouth's service
10 order systems without manual handling by BellSouth
11 service representative.

12 Q And looking -- just to make sure I
13 understand that, if we can turn back to Exhibit 45
14 which was a little copy of your slides. If I
15 understand correctly, for the 30 services listed on
16 Exhibit GC-19, if an EDI order is placed, it goes into
17 the Navigator, it goes into LEO, and then if it's
18 properly formatted, correct order, then flows into
19 LESOG, and SOCS, and I'm going to say flows through
20 the system and generates a mechanized order without
21 being touched by human hands. Is that a good
22 walking-around description?

23 A LESOG is the mechanized order generator that
24 sends the order to the service order control system.
25 Depending on what type of service it is, there may be

1 human hands involved in actually connecting the wires
2 after that point. But in terms of the flow of the
3 order information, once you reach the service order
4 control system it is in a common process with
5 BellSouth retail services.

6 Q Now, do I understand that EDI can be used to
7 order some other things that don't flow through and
8 result in a mechanically generated order in LESOG?

9 A Yes.

10 Q And what are those additional things?

11 A PBX trunks, SynchroNet services, multiline
12 hunt groups, basic rate ISDN, unbundled loops,
13 unbundled ports, and interim number portability.

14 Q And can you also, through EDI, order the
15 combination of an unbundled port -- excuse me, an
16 unbundled loop and interim number portability?

17 A You can order multiple unbundled network
18 elements on the same EDI order.

19 Q Can you order a combination of a loop and a
20 port on an EDI order?

21 A Let me make sure I'm communicating clearly
22 about this. You can order both an unbundled loop and
23 an unbundled port on any EDI order. As I understand
24 it, there are some legal and policy questions around
25 exactly what is meant by combination from a technical

1 perspective, if a combination were to find it could be
2 ordered via the EDI interface. But as it stands
3 today, the EDI interface can be used to order multiple
4 unbundled network elements such as a loop and a port.
5 But that doesn't really have any bearing on the legal
6 and policy questions around the combination of those.

7 **COMMISSIONER CLARK:** Let me just make sure I
8 understand. What you're saying is you can order them
9 together but BellSouth isn't going to deliver them
10 together.

11 **WITNESS CALHOUN:** What I'm saying is you can
12 order both a loop and a port.

13 **COMMISSIONER CLARK:** Right.

14 **WITNESS CALHOUN:** And the order looks at
15 those together but it looks at it as an order for a
16 loop and an order for a port.

17 **COMMISSIONER CLARK:** And if we listen to
18 Mr. Scheye, you're not going to get them together,
19 you're going to get them apart and you've got to put
20 them together, unless you can negotiate a GLU charge.

21 **WITNESS CALHOUN:** You're getting way outside
22 my realm on that. I don't want to speak to the legal
23 or policy issues around that. But from a technical
24 perspective the interface can be made to do whatever
25 the legal and policy decisions say is the right thing

1 to do.

2 Q (By Mr. Melson) Just to recap, with EDI
3 you can place an order that will get mechanically
4 generated for 30 resold services, and you can place an
5 order that would not be mechanically generated for
6 what I would call -- we'll call complex services,
7 hunting, Synchronet, so forth and several UNES. Is
8 that a fair summary?

9 A That's correct. At this point I should add
10 that the services that are available with mechanized
11 order generation represent most of BellSouth's retail
12 operating revenue.

13 Q They don't include --

14 COMMISSIONER CLARK: I'm sorry, will you say
15 that again?

16 WITNESS CALHOUN: The services that we have
17 that -- the list of 30, with the mechanized order
18 generation that doesn't require any human intervention
19 on our side in the ordering process, those services
20 represent most of BellSouth's total retail operating
21 revenue.

22 COMMISSIONER CLARK: Most of the revenue you
23 get comes from that type of service?

24 WITNESS CALHOUN: Yes.

25 COMMISSIONER CLARK: Okay.

1 Q (By Mr. Melson) Now, referring again to
2 Exhibit 45, which is the little drawing, in the event
3 EDI is used to place an order that doesn't result in
4 the mechanical generation of an order, if I understand
5 the flow, it goes through Navigator, it goes to LEO
6 and then it comes out the side of LEO and comes to the
7 local carrier service center for them to deal with the
8 order on a manual basis; is that right?

9 A Yes. Technically what happens is LEO will
10 present the order on a computer screen to the service
11 representative for them to make a determination as to
12 what needs to happen with it.

13 Q I understand you are not relying on LENS
14 ordering for purposes of meeting your
15 nondiscrimination obligation. But let me ask, LENS
16 supports the ordering of the same 30 resold services
17 that are listed on Exhibit GC-19; is that correct?

18 A Yes.

19 Q Does LENS support the ordering of anything
20 else?

21 A Yes. The unbundled network elements that I
22 mentioned earlier can also be ordered via LENS.

23 Q Let me ask, if I could, for you to
24 demonstrate on the LENS ordering screen how an order
25 would be placed for an unbundled loop.

1 **A** All right. I'll be happy to do that, again
2 with the caveat that BellSouth is not relying on LENS
3 ordering. I also would be happy to demonstrate the
4 industry standard method of doing that through the EDI
5 interface.

6 **Q** If your counsel wants to ask you on
7 redirect, I'm sure he or she will do that.

8 **A** Okay.

9 **Q** Let's look just quickly at a UNE order
10 through LENS ordering interface, please. (Shows
11 slides)

12 **A** And you said an unbundled --

13 **Q** Unbundled loop. Now, you click -- and I'm
14 going to describe some of this in words so that the
15 record will be clear. You click first on a box that
16 says "Place Firm Order For a Resale Request"?

17 **A** Yes. If you'd like, I'd be happy to
18 describe what we're going to do.

19 **COMMISSIONER KIESLING:** Before you go any
20 further, it's not on our screen.

21 **COMMISSIONER CLARK:** It looks pretty good up
22 here.

23 **COMMISSIONER KIESLING:** I thought it was
24 going to be set up so we can see it on our screens.

25 **MR. MELSON:** I think Carol had looked at it

1 this morning and it was. I don't know if a connection
2 has come loose or what. If you prefer to look on your
3 screens --

4 MS. WHITE: Stan Greer went to get the
5 person who needs to fix that.

6 CHAIRMAN JOHNSON: In the meantime we'll
7 just look at the screen, and then hopefully they'll
8 get the system back up.

9 COMMISSIONER DEASON: It's on my screen, so
10 if you want to come look. (Laughter)

11 COMMISSIONER KIESLING: Mine is now on.

12 CHAIRMAN JOHNSON: Mine is out. Oh, it's
13 back.

14 COMMISSIONER KIESLING: Okay. Thank you.

15 Q (By Mr. Melson) All right. Now, to order
16 an unbundled loop UNE you click on a box that say
17 "Place Firm Order for a Resale Request."

18 A Yes. Then you need to select an activity
19 type, and we would select "New Installation."

20 Q All right. "Residential."

21 A "Residential." And state of "Florida." We
22 could, if we chose, look at the customer service
23 record if there was an existing customer.

24 Q All I'm concerned about is seeing how the
25 entry is made on the form.

1 **A** Okay. What we would need to do is put in a
2 Florida address, and I think that -- Ms. White, would
3 it be all right if we used your address?

4 **MS. WHITE:** Yes.

5 (Information inputted on screen.)

6 **Q** I notice that's being typed in all capital
7 letters. Is that a requirement?

8 **A** No. I've typed it in lower case. Here we
9 go. (Types on screen in lower case.)

10 So what we're doing here is validating the
11 address. We're going through some of the functions
12 that are required.

13 **COMMISSIONER CLARK:** Mr. Melson, are you
14 trying to learn to be a customer rep for an ALEC?

15 **MR. MELSON:** No. I had read last night in
16 the LENS user guide that it had to be typed in all
17 caps and apparently we've added some functionality
18 that's not documented.

19 **A** Okay. We validated the address. We got a
20 message from the system that it was completed
21 successfully.

22 **Q** You then click on "Okay."

23 **A** Yes. And this shows the telephone number
24 selection screen.

25 **Q** You don't need to select a telephone number

1 for an unbundled loop; is that correct?

2 A Technically that's correct.

3 Q So we can just click through this screen?

4 A Yes. At this point, though, because we're
5 using a resale request, the system may require us to
6 put one in. So we could put in a telephone number.

7 And, again, since Commissioner Clark brought
8 up the service representative issue, I have to issue
9 my disclaimer again here that I can generally show you
10 the process here but I can't promise I'll get every
11 single code right. We'll just take a random telephone
12 number.

13 Q Now, I understood that while a telephone
14 number is not required for an unbundled loop, because
15 of the way one would order it through LENS you have to
16 select a phone number in any event?

17 A That's right. The way it's set up to order
18 through LENS. And again, the industry standard method
19 for ordering an unbundled loop is EDI. And BellSouth
20 has arranged to accept unbundled loop orders through
21 LENS by the method that I'm demonstrating here for
22 you. Okay.

23 Q Now, you continue to the local service
24 request?

25 A We continue to the local service request,

1 yes.

2 Tell the system we want to process the
3 order.

4 We would need to put in a purchase order
5 number; a desired due date.

6 Q Let's just put today. (Information being
7 transferred to screen.)

8 A You would need to indicate you have a
9 letter, a blanket authorization on file.

10 Show that its "residence." And continue to
11 the next screen.

12 Put in the tax exempt status.

13 Q Explain to me at this point what the tax
14 exempt status means.

15 A The tax exempt status is the CLEC's tax
16 exempt status. I'm not a tax expert by any means, but
17 my general understanding of that is that the CLEC may
18 be exempt from paying certain taxes to BellSouth
19 because the CLEC will be collecting those taxes from
20 its end user.

21 Q All right.

22 A You'll notice there's a great deal of
23 information that's prepopulated based on the user
24 profiles set up in the system of the -- associated
25 with the user ID so all of the information about the

1 services that are handled for BellSouth retail
2 customers as well as for CLECs through a BellSouth
3 account team.

4 Q And for services that are not complex
5 services, how would those be ordered?

6 A Through the local carrier service center.

7 Q So an ALEC would fax an order to the local
8 carrier service center?

9 A They could choose to do that.

10 Q What else could they choose to do?

11 A Well, we have one carrier that Federal
12 Expresses a package of orders to us every night. It
13 just depends on what the ALEC wants to do.

14 But, again, the services that -- leaving
15 complex services aside, the services that are
16 available for electronic ordering are those that
17 represent most of BellSouth's retail operating
18 revenue. There are some services that are very low
19 volume, which there hasn't been any demand, and the
20 one that always comes to mind is that BellSouth does
21 still have a eight-party line service in Mississippi
22 that we haven't mechanized. It just didn't seem like
23 a good use of time or money to do that. But we have
24 made arrangements for mechanized ordering and
25 electronic ordering the services that represent the

1 demand.

2 Q Let me ask you, if you could, to turn for a
3 moment to your Late-filed Deposition Exhibit No. 3,
4 which is Page 382-R, part of Exhibit 43.

5 MR. ELLENBERG: Chairman Johnson, may I ask
6 a question for clarification here? Is counsel
7 intending to go on with this demonstration of the LENS
8 loop order?

9 MR. MELSON: Not of the LENS order. We can
10 back out from this point now.

11 MR. ELLENBERG: Thank you.

12 MR. MELSON: Thank you.

13 COMMISSIONER KIESLING: Which page did you
14 say?

15 MR. MELSON: 382-R.

16 Q (By Mr. Melson) Ms. Calhoun, this is a
17 list, if I understand it correctly -- it's not going
18 to be quite as simple as I thought. Page 382-R, plus
19 Pages 383, 384, 385 and 386 is a list of the services
20 and features that a BellSouth --

21 COMMISSIONER CLARK: Is that "R"?

22 MR. MELSON: No, ma'am. 382 is revised.
23 The others were not revised and they are back in the
24 thick package.

25 A I have a package -- and I apologize, I'm not

1 familiar with the numbering scheme here -- but I have
2 a package that has a 382-R but I don't have 383.

3 Q Let me ask this: Do you have a copy of your
4 Late-filed Exhibit No. 3 with the revision date
5 9-4-97? If you've got that then we're all looking at
6 the same thing. (Hands document to witness.)

7 COMMISSIONER CLARK: Would you give the
8 numbers again?

9 MR. MELSON: It's Pages 382 through 386, and
10 the first of those pages, 382, is the only one that
11 has been revised.

12 COMMISSIONER CLARK: Thanks.

13 Q (By Mr. Melson) Is this a list of the
14 services that a BellSouth customer service
15 representative can order through the RNS system?

16 A Excuse me. Give me just a minute here.

17 Q Sure. (Pause)

18 A Yes.

19 Q And would you agree with me that this is a
20 larger list than the list of services that an ALEC can
21 order either through LENS or EDI?

22 A No.

23 Q So it's your testimony that an ALEC can
24 order through EDI everything that a BellSouth customer
25 service representative can order through RNS?

1 A No, I didn't say that. You asked me if this
2 was a larger list and it doesn't appear to me to be a
3 larger list. It's presented somewhat differently.
4 It's actually listing USOCS -- and let me see if I
5 can -- for example, if you look on what was
6 Exhibit GC-19 with my prefiled testimony, No. 22 on
7 there simply shows RingMaster services. And what is
8 being shown on the RNS list are three separate
9 RingMaster USOCS. So I guess what I'm saying is the
10 lists aren't really set up in the same way, so I can't
11 agree that one is larger than the other.

12 Q I understand people in Florida are not going
13 to want to order an eight-party business line service
14 that's available only in another state. But would you
15 agree with me that there are other services that a
16 BellSouth representative can order electronically
17 through RNS that an ALEC cannot order through --
18 electronically either through EDI or LENS?

19 A There may be. Again, the eight-party
20 service is the one that sticks most clearly in my
21 mind.

22 The services that are available for
23 mechanized ordering, for electronic ordering, are
24 those that represent most of BellSouth's retail
25 operating revenue. I haven't said 100%.

1 **COMMISSIONER CLARK:** Mr. Melson, are you
2 going to ask her about a specific service?

3 **MR. MELSON:** No, ma'am.

4 **COMMISSIONER CLARK:** Okay.

5 **MR. MELSON:** And I think I'm going to move
6 along from this line because I've heard the same
7 answer about three times in a row, so I will move on.

8 **COMMISSIONER CLARK:** Well, okay.

9 **Q** **(By Mr. Melson)** Is it --

10 **COMMISSIONER CLARK:** I'm sorry, let me ask
11 one thing before you move on.

12 You indicated on a list of what other ALECs
13 can order is RingMaster. Is that right?

14 **WITNESS CALHOUN:** Yes.

15 **COMMISSIONER CLARK:** And as I understand it
16 it's one service, RingMaster. Yet you list three.
17 What's the difference in the service you can offer?

18 **WITNESS CALHOUN:** There isn't one. What I
19 was trying to point out was No. 22 on my list simply
20 refers to RingMaster services.

21 **COMMISSIONER CLARK:** Right.

22 **WITNESS CALHOUN:** But it doesn't list the
23 individual RingMaster services, and they happen to be
24 listed that way on the RNS list.

25 **COMMISSIONER CLARK:** Okay. So that all

1 three services that you have listed on Exhibit 43 are
2 going to be the services that the ALEC can order under
3 RingMaster.

4 **WITNESS CALHOUN:** Are going to be? Yes.

5 **COMMISSIONER CLARK:** Okay.

6 **Q** (By Mr. Melson) Ms. Calhoun, staying on
7 Page 382-R, I understand that DOE, D-O-E, allows a
8 BellSouth customer service representative to order all
9 products and services that have a valid BellSouth USOC
10 and are in your billing system; is that correct?

11 **A** Yes.

12 **CHAIRMAN JOHNSON:** Mr. Melson, can we go
13 back to the line of questioning you were asking
14 Ms. Calhoun regarding the -- what's mechanized and
15 what is not. Commissioner Clark asked were you going
16 to ask for specific examples. I guess Ms. Calhoun
17 said she couldn't think of any. Could you think of
18 any specific examples?

19 **WITNESS CALHOUN:** I couldn't think of a
20 Florida-specific example. It would be something for
21 which there is very little demand or very low volume.

22 **CHAIRMAN JOHNSON:** And when you said that
23 they may exist for those services for which there's
24 low demand and low volume, but that the majority of
25 the services that were mechanized represented, you

1 said, a substantial percentage.

2 WITNESS CALHOUN: Most.

3 CHAIRMAN JOHNSON: Most. How would you --
4 99, 95, 90?

5 WITNESS CALHOUN: Again, I don't recall the
6 Florida-specific number, but for these services, the
7 services on this list, and the other services that are
8 available for mechanized ordering, compared with
9 BellSouth's small business and residence, operating
10 revenue, it's in the 90s; in the 90s; more than 90%.

11 CHAIRMAN JOHNSON: Thank you.

12 COMMISSIONER CLARK: I didn't understand
13 that. You said compared to.

14 WITNESS CALHOUN: Compared to BellSouth's
15 total retail operating revenue for residence and small
16 business services, which most of these services
17 represent. These services represent more than 90% of
18 that revenue and more than 80% of BellSouth's revenue
19 overall.

20 COMMISSIONER CLARK: Okay. The rest of it
21 is complex?

22 WITNESS CALHOUN: I would say most of the
23 rest of it is complex, and then there might be a few
24 in that category with eight-party service.

25 Q (By Mr. Melson) Ms. Calhoun, let's move,

1 if we could, for a moment and look at a demonstration
2 of the EDI. And EDI is what BellSouth says is the
3 ordering interface that it relies upon to prove
4 nondiscriminatory ordering access.

5 A Yes.

6 Q And for sake of simplicity, I'm just going
7 to focus this morning on residential orders.

8 There are several -- can you bring up the
9 first screen of the EDI interface where we would see
10 the various types of orders, categories of orders can
11 be placed for EDI?

12 WITNESS CALHOUN: For resale services?

13 MR. MELSON: Yes.

14 WITNESS CALHOUN: Yes. We would look at
15 what's called a 850 transaction set for resale, which
16 is a -- 850 is what the industry defines as a purchase
17 order.

18 Q (By Mr. Melson) All right, that's the list
19 I want. So you've tabbed the second tab which says
20 "LSR plus" and then brought up a drop-down box under
21 "account activity."

22 A Yes.

23 Q What does -- I want to get some definitions
24 straight before we go further. What does "conversion
25 as is" means?

1 A "Conversion as is" means that you have an
2 existing, say, BellSouth retail customer who wants to
3 just take their service and switch it "as is" to an
4 ALEC.

5 Q What is -- if you'd leave the drop-down box,
6 please. What is "conversion to new LSP"?

7 A "Conversion to new LSP" is conversion to new
8 local service provider, also known as conversion as
9 specified; meaning that you may be converting your
10 service, switching service to a new provider but want
11 to change some aspect of that service. You might, for
12 example, want to change your interexchange carrier
13 selection.

14 Q Or if I wanted to change from BellSouth to
15 MCI and I wanted to add a custom-calling feature I
16 didn't have before, is that where you would use
17 "conversion as specified "or "conversion to new LSP"?

18 A Yes.

19 Q Is there a way to order a new installation,
20 a new service --

21 A Yes.

22 Q -- through the EDI interface?

23 A Yes.

24 Q It's listed as "new install"?

25 A Yes.

1 Q Is there a way through the EDI interface --
2 assume that MCI resale customer already converted from
3 BellSouth to MCI last month and calls MCI this month
4 and says, "I want to now add custom-calling features."
5 What is that called?

6 A "Change to existing service." Could you
7 highlight that, please? (Selection on screen shown.)

8 Q And the EDI interface supports changes; is
9 that correct?

10 A Yes. The arrow there is pointing up --
11 wait, I have my laser pen -- change that to "Existing
12 Service." (Points to slid.)

13 Q I assume you can click on that and have it
14 appear in the box above; it really works. Okay.

15 A Yes, it really works.

16 Q Thank you. You cannot do a change order
17 through the LENS ordering interface; is that correct?

18 A That's correct.

19 Q All right. Now, to order this service
20 through EDI, I would have to put in a valid billing
21 address; is that correct?

22 A A valid --

23 Q Excuse me, a valid service address. Excuse
24 me.

25 A Yes.

1 Q And EDI doesn't verify that address. That's
2 an address I have to get earlier through my
3 preordering function in LENS; is that correct?

4 A Yes, that's correct.

5 Q What if I didn't use LENS preordering, I
6 just relied on the address the customer told me and
7 the address was not valid; what would happen if I put
8 an invalid address in the EDI order?

9 A Going back to --

10 Q Exhibit 45.

11 A Yes. This drawing (indicating). When the
12 service order mechanically reached the service order
13 control system it would -- the system would recognize
14 that the address was invalid, and the order would
15 route to the local carrier service center and they
16 would fix the address.

17 Q And is that what is known as a "reject"?

18 A Yes -- well, that's one.

19 Q That's one type of a reject?

20 A Right.

21 Q If we were ordering a new installation of
22 resold service through EDI, would we also have to
23 enter a telephone number -- the telephone number to be
24 assigned on this EDI screen?

25 A Yes.

1 Q And can you show us where that is?

2 A Yes. It's on the resale screen. And the
3 telephone number goes in the box labeled "telephone
4 number."

5 Q All right. Now, the telephone number either
6 has to be off of a list of numbers the carrier has
7 reserved, or it has to be a number that was selected
8 through the LENS preordering interface; is that
9 correct?

10 A That's right.

11 Q What would happen if you subsubmitted an EDI
12 order or didn't have a telephone number in it?

13 A The EDI translator would recognize that
14 there was information that you needed to have missing,
15 and it would send you the reverse of the functional
16 acknowledgements we talked about yesterday that said,
17 "Wait. There's a problem with this order."

18 Q Now, what if you, in fact, entered a
19 telephone number but mistyped a digit and entered a
20 telephone number that was currently assigned to
21 somebody else? Would that fall out when it got to
22 your -- well, what would happen with that order?

23 A Yes. It -- again, the system would
24 recognize there was a problem with that and the system
25 would route that order to the local carrier service

1 center for what is known as "clarification."

2 Q And in placing an order through LENS for a
3 new installation, do you have to insert a desired due
4 date?

5 A That's right.

6 Q And where is that entered?

7 A I believe that's back on the second form,
8 that is the LSR-plus form. Then you put the desired
9 due date there.

10 Q And to get a desired due date to put in that
11 field, you first have to use the preordering function
12 in LENS, the calendar we looked at yesterday, to
13 obtain a due date; is that correct?

14 A Yes, depending on the type of service that
15 you're doing. As I mentioned yesterday, there are a
16 number of order types. It just -- you know, follow a
17 business rule saying that if you have the order in by
18 3:00 today, if you're doing a switch "as is," for
19 example, if you have the order in by 3:00 today, it's
20 a two-day due date. It's not strictly necessary to
21 calculate a due date for every type of order.

22 Q Well, let me ask just a follow up on that.
23 If it was a new installation, a new customer, you
24 would have to indicate a desired due date; is that
25 correct?

1 A You have to indicate a desired due date in
2 any case. I thought that --

3 Q I'm sorry. If it was a new installation to
4 enter a desired due date that has a chance of being
5 met, you would have to first check the calendar in the
6 LENS preordering interface; is that correct?

7 A It would be the wise thing to do.

8 Q All right. And you said there's some things
9 that you don't have to check that calendar for and
10 that's because they're subject to the "in by 3:00, out
11 the same day" rule?

12 A Well, that's not exactly right. The reason
13 you don't have to check the installation calendar is
14 that there are a number of types of orders that don't
15 require a premises visit by an installer, and the
16 installation calendar is showing the availability of
17 an actual technician to go and perform work at the
18 customer's premises.

19 Q If a customer premises visit is not
20 required, is the business rule "in by 3:00, out the
21 same day"?

22 A I think it varies depending on what is
23 actually being done.

24 Q If it's a change "as is" of an existing
25 service, is the business rule "in by 3:00, out same

1 day"?

2 A Yes.

3 Q If it is a change "as specified," and all
4 that you are doing is adding, for example, call
5 waiting, a feature that's provided in the central
6 office switch, is that subject to the "in by 3:00, out
7 by 5:00" -- out the same day business rule?

8 A I think it depends on the feature and what
9 the interval for that feature is.

10 Q Where would I go to look to find the
11 interval for call forwarding or call waiting?

12 A Those intervals have been provided in an
13 industry letter sent by the interconnection sales
14 organization that was sent to all ALECs.

15 Q Is that a letter dated June 16th?

16 A Yes.

17 MR. MELSON: I thought I had a stack. If
18 you'll give me just a minute, Commissioners. (Pause)

19 MR. ELLENBERG: If I could while he's
20 thumbing through documents, are we finished with this
21 demonstration as well and can back out?

22 MR. MELSON: No.

23 MR. ELLENBERG: No.

24 MR. MELSON: Let me pass out a document that
25 is an industry letter dated June 16th which shows

1 installation intervals and ask you if that's the
2 document to which you were referring.

3 A Yes.

4 MR. MELSON: Commissioner Johnson, could we
5 have in marked for identification as Exhibit 46?

6 CHAIRMAN JOHNSON: It will be marked as 46.

7 (Exhibit 46 marked for identification.)

8 MR. MELSON: Referring to this document,
9 Ms. Calhoun, can you answer my previous question of
10 whether the addition of call forwarding in a
11 change-as-specified situation is subject to the "in by
12 3:00, out the same day" business rule?

13 A Yes.

14 Q And how do you determine that?

15 A By looking at the product list under Custom
16 Calling, looking at the interval in the second column
17 from the right for an existing account -- or for
18 resale switch with changes; and that indicates that if
19 it's before 3:00 p.m., it's a zero due date, meaning
20 it's today; if it's after 3:00 p.m, it's a one-day due
21 date, meaning tomorrow.

22 Q In EDI, let's assume we're placing an order
23 for a -- a customer wants to convert to an ALEC and
24 wants to add a feature. I've always called that
25 conversion "as specified". And you call it an EDI

1 conversion to a new LSP?

2 A Yes.

3 Q If I already had three custom-calling
4 features and wanted to add a fourth, when I place that
5 EDI order, do I list only the feature I want to add or
6 do I have to list all of the features that the
7 customer already enjoys?

8 A You have to list everything that you want
9 the customer to have after the order is completed,
10 including what he has that he's keeping and what might
11 be being added. And that is a requirement that -- it
12 was determined not by BellSouth, but by the Ordering
13 and Billing Forum.

14 Q So conversion "as is," a customer simply
15 changes providers and keeps all of his existing
16 features, no additions or deletions? You don't need
17 to list the features; correct?

18 A That's right.

19 Q But if you're either adding something or
20 deleting something, then you need to list -- place an
21 order for everything that the customer will have after
22 the provider change?

23 A Yes. That's what the industry agreed upon.

24 Q And that's the same in the LENS ordering
25 mode; is that correct?

1 A Yes.

2 Q In an analogous situation where a customer
3 calls BellSouth and says, "I want to add a feature,"
4 isn't it a simple matter for the customer service
5 representative in the RNS system to call up the
6 customer's account, call up a screen that shows the
7 features, and click "yes" next to the feature that
8 wants to be added?

9 A I guess I disagree that that's an analogous
10 situation. The first situation you described is one
11 in which the customer is actually doing two things.
12 He or she is switching his or her service to the new
13 local service provider, and at the same time they're
14 making changes.

15 In the BellSouth case, their account is
16 already set up with BellSouth, and they're simply
17 adding to that existing account. In the first
18 instance, you're doing two things; you're setting up a
19 new account with everything on it that that customer
20 wants as well as making the change.

21 Q Well, let me ask this, Ms. Calhoun:
22 Conversion "as is" is, in essence, a billing change
23 from BellSouth's point of view, is it not? You quit
24 billing the end user customer and you begin billing
25 the ALEC reseller?

1 A In one sense that's the net effect of the
2 change, but there's actually more to it than that.
3 What you're doing is you're discontinuing the existing
4 customer's service and existing customer's record with
5 BellSouth rendering a final bill to that customer,
6 establishing a record under the reseller's account for
7 that particular end user service, and you're doing
8 that in a way that makes changes in all the systems
9 that have to recognize that as being a resold account
10 now. For example, the repair system needs to
11 recognize that that's a reseller's account.

12 So it's a little more complicated than what
13 you've described.

14 Q Let me take a step back. Let me ask my
15 prior question, and I will leave out analogous
16 situations since I understand you don't believe it's
17 analogous.

18 If a customer called BellSouth and said, "I
19 want to add a feature," in RNS isn't it true that the
20 customer service representative would simply call up a
21 screen of available features, would click "yes" on the
22 box next to the added feature and submit the order?

23 A Well, that's a pretty simplistic overview.
24 That's how they would indicate the particular feature,
25 but there's more to actually completing the order than

1 that.

2 Q Sure. You'd have to put in the telephone
3 number so that you're calling up the correct customer
4 service record?

5 A Right. I mean, there are a number of things
6 that need to be done.

7 Q And in RNS, if a customer called and said,
8 "I want to delete one of these features I have today,"
9 is it a -- in terms of making the change to the
10 feature, calling up the customer record and checking
11 "no" in a box next to a service the customer has
12 today?

13 A Well, again, that's a little simplistic, but
14 again I have to point out you've switched from what we
15 were talking about here.

16 As I mentioned earlier, one of the activity
17 types that's available through EDI is making a change
18 to an existing service that's already been converted
19 to a reseller, and that's where you would perform that
20 activity, in EDI.

21 Q So if I want to convert -- if the customer
22 wants to convert to me and add a feature at the same
23 time, and I'm an ALEC, I've got two choices. I can
24 either do change to existing local service -- or
25 change to new local service provider, or I can do a

1 change "as is" and then come back later and do a
2 change to existing service?

3 A You could choose to do that.

4 Q And I have both of those orders pending at
5 the same time; the change -- conversion "as is" and
6 immediately followed by a change to existing service?

7 A I believe you could, yes.

8 Q In EDI, when an order is submitted or
9 queued, placed in a queue to be transmitted, are there
10 any realtime edits for missing data if a required
11 field has not been completed?

12 A Yes.

13 Q Is there any editing at that point of the
14 format of an entry? For example, if I type in a
15 six-digit phone number by mistake instead of a
16 seven-digit number, will there be any edit check of
17 that type of error?

18 A Yes.

19 Q If I put invalid information -- I think we
20 may have discussed this -- such as an invalid address
21 or invalid telephone number for assignment, is there
22 any edit at the point the order is submitted of that
23 type of information?

24 A Let me make sure I understand your question.
25 Are you saying EDI in general, or are you talking the

1 EDI PC package?

2 Q Let's talk EDI PC.

3 A No. That's not a function of the EDI PC
4 package. Address validation is a preordering
5 function, and that function is available to an ALEC
6 through the LENS system. And having validated the
7 address in LENS, they can move either through the
8 pasting method that we looked at yesterday or through
9 a programmatic method that they might choose to
10 implement. They could move that information into the
11 EDI order, so they would already have the validated
12 address.

13 On the other hand, you know, remember the
14 discussion that an ALEC can choose to build whatever
15 system they want to build on their side of the
16 interface, and they're free to put any kind of
17 checking or editing function that they would want to
18 have on their side of the interface, if they want to
19 build it that way.

20 Q And if they want on build an interface that
21 goes and checks BellSouth's RSAG, regional street
22 address guide, to validate the address, is an ALEC
23 provided direct access into RSAG?

24 A Can you clarify what you mean by direct
25 access? I mean, LENS provides access to RSAG, and

1 there's another available interface that's been used
2 by interexchange carriers for address validation that
3 provides access to RSAG.

4 Q I guess what I'm asking is, you just said
5 that an ALEC could build a front end that would allow
6 it to do some edit checking. And I'm asking can that
7 ALEC build a front end that accesses BellSouth's
8 downstream databases where the information resides
9 that you would need to have to do an edit check?

10 A Other than through the two systems I just
11 described, I don't know of a direct path into RSAG,
12 but the data is available through LENS and can be
13 integrated with the CLEC system that way.

14 Q If a BellSouth customer service
15 representative was using RNS or DOE, they would have
16 edits of all of those types of information; is that
17 correct; missing data, format of entries, and the
18 substance of the data, or what you sometimes call
19 business rules?

20 A I think, if I heard your question correctly,
21 that they would have access to all edit checks. And
22 the answer is that they would have access to many, but
23 not to all.

24 Q Would they have access to more edit checks
25 than are provided either through EDI or LENS?

1 A Yes. They have access to more than are
2 available through the EDI translator itself.
3 Additional edit checking is done in the LEO and LESOG
4 systems.

5 Q If an order is submitted through EDI and it
6 is not correct and complete because an error has been
7 made in the entry, does that create what I believe we
8 previously labeled a reject situation?

9 A Yes.

10 Q Of the types of orders that are designed to
11 flow through and create a mechanized order when the
12 order is placed through EDI, do you know what
13 percentage of rejections BellSouth is experiencing for
14 those orders?

15 A I don't. I think perhaps that would be a
16 better question to direct to Mr. Stacy.

17 Q And my understanding is that when an EDI
18 order is rejected, it drops -- that reject is not
19 communicated electronically back to the ALEC, but
20 instead drops out to the local customer service center
21 for some manual handling; is that correct?

22 A No, not always. There's a transaction set
23 defined by the industry; the 997 transaction set sends
24 back rejects that are identified by the EDI
25 translator.

1 Q And what rejects are those?

2 A Those are the ones that check for the
3 presence of required data or the format of that data
4 and whether required fields have been filled out.

5 Q I guess I thought you told me a moment
6 ago -- and I may have misunderstood -- that checking
7 for missing data and for format took place in your
8 EDI PC interface before the order was ever submitted.

9 Am I now hearing that some of that edit
10 checking doesn't take place until after the order has
11 been submitted so that it creates a reject situation?

12 A No. And maybe we miscommunicated about
13 this. The EDI translator in the EDI PC package is
14 going to check for that information. The EDI
15 translator on BellSouth's side of the interface is
16 going to check for that information again. I mean,
17 the data is being transmitted and there may be
18 problems with the data as it's transmitted.

19 If for whatever reason the data is not
20 correct when it gets to BellSouth's EDI translator,
21 then notification of that will be sent electronically.

22 Q But if there was anything other than a
23 missing field or an incorrect format, those other
24 types of rejects drop out to the local customer
25 service center for some manual handling or to be

1 communicated back to the ALEC on a manual basis; is
2 that correct?

3 **A** Yes. And orders that are rejected by
4 BellSouth's service order system on the retail side
5 are routed for manual handling to an error correction
6 group as well.

7 **MR. MELSON:** Commissioner Johnson, I'm going
8 to move in a minute to a demonstration of the LENS
9 inquiry mode. This might be an appropriate place for
10 a break if we were considering one this morning.

11 **CHAIRMAN JOHNSON:** Okay. We can take a
12 10-minute recess.

13 **MR. MELSON:** Thank you.

14 (Brief recess.)

15 - - - - -

16 **CHAIRMAN JOHNSON:** We're going to go back on
17 the record.

18 **Q** (By Mr. Melson) Ms. Calhoun, what I'm
19 going to ask now is I'm going to have several
20 questions for you about the inquiry in LENS. Is that
21 the same as the preordering mode?

22 **A** No. There are preordering functions, and
23 there are preordering functions in both the inquiry
24 and the firm order mode.

25 **Q** Okay. Let's go into the inquiry mode in

1 LENS, and let's -- I'm going try to take these in the
2 same order we did yesterday if I can remember. I
3 think the first thing we did yesterday was view a
4 customer record?

5 A Yes.

6 Q And do you have a friendly Florida telephone
7 number we can use?

8 A I believe Ms. White would allow us to use
9 hers.

10 COMMISSIONER CLARK: I want to see
11 Commissioner Garcia's. (Laughter)

12 Q (By Mr. Melson) You type in the phone
13 number, you click "okay," you see a screen that
14 requests confirmation that you've got access to the
15 record, and you click "authorized"?

16 A Yes.

17 Q At this point, the system is retrieving the
18 customer service record?

19 A Yes.

20 Q Is it retrieving everything that is in
21 BellSouth's customer service record for that customer?

22 A No. It's retrieving everything that was
23 identified in the arbitrations and the negotiations as
24 being elements necessary for an ALEC to provide
25 service to its customers.

1 Q What information in the BellSouth customer
2 service record is it not retrieving?

3 A It's not retrieving credit history, credit
4 information. It's not retrieving detailed billing
5 information other than the billing name and address.

6 Q Are you aware that the Florida Commission in
7 the arbitrations indicated that ALECs -- or excuse
8 me -- MCI and AT&T, at least, were to be given access
9 to customer payment history information?

10 A Yes, I am. And that capability is in the
11 process of being added to LENS. The initial design of
12 LENS was to provide all of the agreed-upon
13 information, the basic set of information that had
14 been agreed upon first in the AT&T arbitration; and
15 then the payment history was decided upon
16 subsequently, and that information is in the process
17 of being added and will be available October 8th.

18 Q The payment history information was not
19 decided subsequent to the AT&T arbitration, was it? I
20 thought it was decided as part of the AT&T
21 arbitration.

22 A My recollection is that payment history was
23 not required, or not addressed as part of the AT&T
24 arbitration, but was addressed in the MCI arbitration.
25 The credit information issue in the AT&T arbitration

1 was somewhat different.

2 Q Is it fair to say that the AT&T arbitration
3 and the MCI arbitrations occurred concurrently in
4 Florida. Do you know?

5 A The hearings did, but -- and, again, I don't
6 recall the specific dates -- but there were, in my
7 recollection, a series of orders and then orders on
8 reconsideration, or whatever the appropriate term is.
9 And the final order -- as I recall, the final order in
10 the MCI arbitration on the payment history was
11 subsequent to -- it had remained as a disputed issue
12 and was subsequently settled, and is being reflected
13 in the work that's being done in LENS now.

14 Q In any event, BellSouth implemented other
15 things first and has not yet implemented customer
16 payment history access in LENS; is that correct?

17 A BellSouth implemented what we knew about and
18 had agreed upon earlier in the process, and that
19 implementation occurred earlier because it had begun
20 earlier. We began work immediately upon resolution of
21 the disputed issue to add that functionality, and that
22 is due to be added October 8th.

23 Q Was the answer to my question, yes, you
24 first implemented other things and have not yet
25 implemented credit information?

1 A No. I don't think the answer to your
2 question is yes. We first implemented what I had
3 described, and the implementation of the credit
4 payment history is well underway.

5 Q I guess I'm not understanding. Let me ask
6 one more time. Is it true that you first implemented
7 things other than customer payment history, and you
8 have -- you are in the process, but have not yet
9 implemented customer payment history?

10 A The first part of your question is true, and
11 the second part -- and maybe I'm just getting hung up
12 on the term. "Implementation" to me is not an event,
13 it's a process. We are in the process of
14 implementing.

15 Q Let's move out of the customer record screen
16 and back to the -- I hesitate to call it main menu --
17 the "inquiry only" menu. Assume that we are going to
18 install a new service. So I don't have an existing
19 telephone number; I've got only an address?

20 **MR. MELSON:** And, Commissioners, I
21 apologize. I have got a Georgia address. I don't
22 have a good Florida address that doesn't have service
23 today. I've got a good Georgia address that doesn't
24 have service and the permission of the customer to use
25 it.

1 Q (By Mr. Melson) Let me ask you,
2 Ms. Calhoun, would the process be the same whether we
3 were using a Florida address or a Georgia address?

4 A Yes.

5 Q Let me give you my address. And the first
6 step, if I am going to get the information necessary
7 to place an EDI order for a new service at this
8 address, would be to validate the address; is that
9 correct?

10 A Well, not necessarily. It depends on how
11 you choose to organize the contact with the customer.
12 If the customer were interested in telephone numbers
13 first, you could go directly there and validate the
14 address as part of the telephone number selection.

15 Q Well, let's go to the "validate address
16 screen" first.

17 A We can do that, but I would point out that
18 it's not necessary to go there first and separately if
19 you're going to do the other functions.

20 Q All right. Then let's cancel this. Let's
21 go first, then, to "reserve telephone number."

22 A Okay.

23 Q And you clicked on "okay" to move to an
24 address validation screen?

25 A Yes.

1 Q The address is 3800 Spalding Bluff Drive
2 N.W, Norcross, Georgia. You enter that information
3 and click on "validate"; is that correct?

4 A Yes.

5 Q I hesitate to ask. What does the message
6 "the address is valid but no living unit exists" mean?

7 A Again, with the caveat that I'm not a
8 service rep, my guess is that the address is within a
9 range that's defined as valid. It's an address that
10 the system recognizes, but it may be a vacant lot.

11 Q All right. Well, this is where I want
12 service.

13 A Okay.

14 Q So at this point we click "okay"; is that
15 correct?

16 A Yes.

17 Q And this then brings up a telephone number
18 reservation screen; is that correct?

19 A Yes.

20 Q Now, if I was a BellSouth customer service
21 representative using RNS, and I had just completed the
22 address validation, at this point the system would
23 have generated a randomly assigned telephone number
24 and would carry that telephone number through future
25 steps in the process; is that correct?

1 **A** No. Not entirely. The system would
2 randomly select a telephone number and suggest it, and
3 it would bring that up as part of a telephone number
4 selection screen and let you make a determination at
5 that point whether the customer liked that number or
6 whether they wanted to choose a different number.

7 **Q** In the order in which a BellSouth customer
8 representative normally handles a customer contact,
9 isn't it true that the BellSouth representative first
10 validates the address, then selects "features and
11 functions," and then asks the customer if the number
12 that has carried through to that point in the process
13 is acceptable and makes a change if the customer
14 rejects that number?

15 **A** Not necessarily. If the customer -- they
16 can go to the telephone number first.

17 **Q** Let me ask this: If the BellSouth customer
18 service representative reads the random number
19 assignment to the customer, and the customer says,
20 that's fine, the representative never has to go into a
21 number assignment screen; is that correct?

22 **A** No, that's not correct. The randomly
23 assigned number appears in a telephone number
24 selection screen. That's where they see it.

25 **Q** Isn't it true --

1 A They're already there.

2 Q Excuse me. Isn't it true that it also
3 appears on the first address validation screen as soon
4 as the address is validated?

5 A I don't recall that.

6 Q Would you accept, subject to check, that we
7 saw that feature demonstrated in Jacksonville either
8 last week or the week before? Dates begin to run
9 together now.

10 Let me ask this, Ms. Calhoun: You don't
11 know whether or not the number appears immediately
12 when the address is validated; is that your testimony?

13 A I don't recall ever having seen it appear
14 immediately on the address validation screen is what I
15 was trying to say.

16 Q All right. Thank you. Would you click on
17 the options for selecting telephone numbers. I
18 believe you described yesterday that there were a
19 number of options available here that are not
20 available to a BellSouth customer service
21 representative. I believe you listed ascending line
22 digits, descending line digits and identical line
23 digits; is that correct?

24 A Yes. Those are types of searches that can
25 be done.

1 Q Let me ask you to search for ascending line
2 digits. So you select that as an option, and you
3 click "okay." What does this screen mean?

4 A This is the screen that would present any
5 numbers that were available to you if there were any
6 that match the criteria.

7 In this case, the system is telling us, the
8 message at the bottom reads "No numbers found to match
9 your request." It's saying that in the available pool
10 of numbers for the central office serving that address
11 there are no numbers with ascending line digits
12 available.

13 Q Let's go back and try descending line
14 digits, then.

15 A I guess I should point out that in order for
16 a service to be -- in order for a particular telephone
17 number to be found, it has to be available in the
18 database.

19 In this case, we find that the telephone
20 number 446-3210, the descending line digits being the
21 3210, is available and could be selected.

22 Q All right. And let's say I want to select
23 this number. What steps do I then take? And
24 describe, if you would, for me the clicks or key
25 strokes.

1 A You'd highlight the number and click on the
2 right pointing arrow.

3 Q That moves it from "available" to
4 "selected"?

5 A Yes.

6 Q Now it says "too few numbers to satisfy
7 quantity requested."

8 A Right. The default number of selections
9 that would be returned would be ten. So if there
10 happened to be ten numbers available that matched the
11 requested criteria, then the customer -- or the CLEC
12 would see a choice of ten numbers that fit, descending
13 line digits that they could offer the customer. In
14 this case the system is saying, well, I tried to find
15 ten, but this was the only one I could find. I can't
16 find --

17 Q If I wanted -- and let's not do this next
18 step. But if I wanted to use that number for this
19 customer, I would then click on "keep"?

20 A Yes.

21 Q Let's cancel this and go back to the prior
22 screen. Now, let me see what the normal course of
23 simply selecting a random number, how would that be
24 done?

25 A Random number, click on "okay". The system

1 brings up a set of ten numbers.

2 Q And then you would select a number from that
3 list. You'd click on the number, click on an arrow
4 and click on "keep"; is that correct?

5 A Yes.

6 Q Let's do that. Now, at this point can the
7 ALEC guarantee the customer that that number will be
8 the customer's ultimate number?

9 A No. And that's true for BellSouth retail
10 customers as well. The standard practice is to advise
11 the customer that this is the telephone number we're
12 assigning to your order, but -- and we never know for
13 certain what might happen, and this tends to be an
14 issue where someone is going to have printing done.
15 We don't advise customers to have printing done until
16 their service is actually installed.

17 Q Now, did our proxy customer service
18 representative copy that number down?

19 A I believe he did, yes.

20 Q He would have to if he was going to use that
21 number then to place an EDI order, correct?

22 A Yes. He would have highlighted it and
23 copied it into his notepad or the record he was
24 building for this customer, and it's available there
25 to be copied into the EDI order.

1 Q Now, would there typically be more than one
2 NXX available to serve a particular address?

3 A That's probably a better question for the
4 network person.

5 Q Let me ask this: Does the telephone number
6 assignment screen show a list of the available NXXs?

7 A No.

8 Q Does --

9 A You can ask for a particular NXX by --
10 there's a field that you can use to ask for a
11 particular NXX, but it doesn't show the ones that are
12 available.

13 Q So if I've never placed an order for
14 Norcross -- I notice you cut and paste the street name
15 but you have to type in the city again?

16 A I'm sorry. I thought we were talking about
17 telephone numbers, and it sounds like you're asking me
18 an address validation question.

19 Q Well, to get back to the telephone number
20 assignment screen we've got to go through address
21 validation again; is that correct?

22 A Yes.

23 Q And in the demonstration, you were able to
24 cut and paste the street name in, but you did not cut
25 and paste the city name in. That was reentered

1 manually; is that correct?

2 A Well, you could cut and paste it. It would
3 be up to you.

4 Q That would be a sequence of multiple cut and
5 paste operations; is that correct?

6 A Yes. For -- two.

7 Q So if the customer says, "I'm moving from my
8 current address to this vacant lot and I've currently
9 got a 441 NXX; is that available to me at this new
10 address," there's no indication on this screen of what
11 the available NXXs are; is that correct?

12 A That's right. There's no indication on this
13 screen.

14 Q And is there an indication anywhere in the
15 5LENS inquiry mode of the available NXXs associated
16 with a particular address?

17 A Not to my knowledge.

18 Q In RNS, the system used by a BellSouth
19 customer service representative, that does display a
20 list of all the available NXXs; is that correct?

21 A I don't recall seeing it in RNS, no.

22 Q Let me ask this: Did you attend the
23 demonstration in Jacksonville on August 27th?

24 A No.

25 Q Do you know whether or not RNS displays a

1 list of NXXs associated with a validated address?

2 A No, I can't say that for a fact. I can say
3 that to the best of the my recollection, I've never
4 seen it do that.

5 Q Well, I've only seen it once, and I've seen
6 it, so our recollections differ. The answer is you do
7 not know?

8 MR. ELLENBERG: Chairman Johnson, that's the
9 second time this morning, at least, that counsel has
10 tried to, I guess, provide unsupported testimony; and
11 I object to that and I move that that remark be
12 stricken from the record.

13 MR. MELSON: Commissioner Johnson, we will
14 have a witness later in these proceedings who viewed
15 the demonstration, and I will be happy to have this
16 information elicited from him.

17 CHAIRMAN JOHNSON: So he's asked that we
18 strike that? Are you --

19 MR. MELSON: Let me rephrase the question.

20 COMMISSIONER CLARK: Can I ask a question.
21 Why can't you do it by request for admission? Either
22 it does or it doesn't. I mean --

23 MR. MELSON: At this point --

24 COMMISSIONER CLARK: -- can't you work it
25 out?

1 **MR. ELLENBERG:** If counsel would ask for a
2 late-filed exhibit on that fact, we would be glad to
3 provide the information.

4 **COMMISSIONER CLARK:** I don't need that.

5 **MR. MELSON:** Commissioner Johnson, Ms. White
6 saw the same demonstration I did. I wonder if
7 Ms. White, on behalf of BellSouth, could admit that
8 that screen -- that the BellSouth customer service
9 representative sees a list of available NXXs.

10 (Laughter)

11 **MS. WHITE:** I don't remember. I don't think
12 I was paying as close attention as Mr. Melson was.
13 Why don't we do this, during the next break or lunch,
14 Ms. Calhoun will find out the answer to that question.

15 **MR. MELSON:** That would be fine. Thank you.

16 **Q** **(By Mr. Melson)** And, Ms. Calhoun, let me
17 assure you I am not trying to misrepresent what we saw
18 during the demonstration.

19 To the extent I asked you if RNS provides
20 the capability, it's based on my recollection that I
21 saw it. You may or may not have seen it. You may or
22 may not know it. If you could just answer based on
23 your personal knowledge, and if we need to go back and
24 make further inquiry we can do that at a later point.

25 **A** All right. And I don't know if this would

1 be appropriate, but I could offer to shed some light
2 on this by looking at Exhibit GC-8 filed with my
3 direct testimony.

4 Q Certainly. If you have a way to shed light
5 it on it, that would be wonderful.

6 A Exhibit GC-8 shows the telephone number
7 selection screen from RNS that we've been discussing,
8 and that screen does not show the list of available
9 switches for a particular location. It gives the
10 capability to select a particular exchange, as does
11 LENS, but it doesn't list the exchanges that are
12 available.

13 Q Do you have -- and I don't know the answer
14 to this -- do you have in your backup a copy of the
15 feature selection screen from RNS?

16 A I have a copy of one. I mean, there are
17 many in all the systems. But that's Exhibit GC-10.

18 Q Well, to move this along, let me ask, during
19 the break if you could determine whether the
20 available -- whether it is possible in RNS to display
21 the NXXs associated with a particular validated
22 address regardless -- and I guess also find out for me
23 which screen or screens that information is displayed
24 on.

25 A Let me make sure I have your question right.

1 Is it possible in RNS to display a list of available
2 NXXs?

3 Q Associated with a particular address. And,
4 if so, what screen or screens does that appear on.

5 A All right.

6 Q All right. At this point in our use of the
7 LENS inquiry mode, we have validated an address as
8 part of selecting a telephone number, and we've now
9 selected a telephone number; is that correct?

10 A Yes.

11 Q Now I want to view the feature and services
12 available in that office so I can answer my customers'
13 questions about what they might purchase. I go to the
14 "inquiry only" menu and choose "view features and
15 services"; is that correct?

16 A Yes.

17 Q At that point I click "okay" and validate
18 the address for the second time; is that correct?

19 A Yes.

20 Q Now, in RNS a BellSouth customer service
21 representative who is having a customer contact and
22 carrying through to place an order validates the
23 address only once; is that correct?

24 A That's correct.

25 Q And is that same true in DOE for a business

1 service?

2 A Yes.

3 Q We validate the address again, and we click
4 on "okay". At this point the first thing we see is a
5 list of available carriers; is that correct?

6 A Yes, that's at the top of the screen, and at
7 the bottom of the screen is the place to choose
8 services.

9 Q I ask my customer what long distance carrier
10 he prefers to use, and he says, well, I just moved
11 here from California and I was sort of happy with
12 U.S. West, and if they're available, I would like to
13 use them. How do I determine through LENS whether
14 U.S. West is an available long distance carrier?

15 A You would scroll through.

16 Q Okay. Could you demonstrate that, please?

17 A Yes.

18 Q We've clicked and we've got another part of
19 the menu that begins with A's?

20 A Yes. We're going to continue scrolling
21 through the screens until we come to U.S. West.

22 Q And these are in random order; is that
23 correct?

24 A Yes.

25 COMMISSIONER CLARK: Random alphabetical

1 order.

2 WITNESS CALHOUN: Yes.

3 COMMISSIONER CLARK: All A's are together,
4 right?

5 MR. MELSON: No.

6 WITNESS CALHOUN: Primarily, but there are
7 some that are interspersed, and I'm not sure why that
8 is.

9 COMMISSIONER CLARK: Then what does random
10 alphabetical order mean?

11 WITNESS CALHOUN: Random alphabetical order
12 means to me that you start at a random place in the
13 alphabet, but then for some reason, sometimes there's
14 one that looks like it doesn't belong interspersed.

15 Q (By Mr. Melson) So we've moved from the
16 A's to Midcom, then back to "business choice," then to
17 Starlink, then to BellSouth Telecommunications, then
18 to Centron, so that -- At least the screen we're on
19 now does not appear to be in alphabetical order?

20 A Right.

21 COMMISSIONER DEASON: And you indicated that
22 that was a regulatory decision that it not be in
23 alphabetical order?

24 WITNESS CALHOUN: Yes.

25 COMMISSIONER DEASON: So that no particular

1 IXC would have an advantage over another IXC?

2 WITNESS CALHOUN: Right.

3 COMMISSIONER DEASON: So that was not your
4 decision?

5 WITNESS CALHOUN: No.

6 COMMISSIONER DEASON: Do you agree, though,
7 that it makes it cumbersome to use?

8 WITNESS CALHOUN: Yes. I agree that it
9 makes it cumbersome to use --

10 COMMISSIONER DEASON: So who can Mr. Melson
11 petition to have it changed to get it in alphabetical
12 order so it would be easier to use? FCC?

13 WITNESS CALHOUN: I'm not certain. There is
14 a way to make it easier to use. And my understanding
15 is that we've had discussions with the carriers about
16 that and that we plan to add that capability to let
17 them search for a particular one.

18 The purpose of having them come in random
19 order primarily is if the customer says "Well, I don't
20 know who I want to use, who is available," you don't
21 want to start reading with the A's every time.

22 And, also, I would point out here that that
23 capability only comes about if there's -- if the
24 customer says "I don't know," and they want to be read
25 a list; or if the CLEC doesn't have a relationship

1 with a particular interexchange carrier or doesn't
2 happen to be one themselves, it's a very simple matter
3 for MCI to know its PIC code so that if a customer
4 wants to be presubscribed to MCI, MCI doesn't have to
5 look for its own PIC code, it just knows what that is.

6 **COMMISSIONER DEASON:** What about in the
7 example that Mr. Melson just indicated, that a new
8 customer wants U.S. West? Is there any way to
9 designate U.S. West without having to go through
10 multiple screens to see if and when U.S. West appears?

11 **WITNESS CALHOUN:** No, not at the current
12 time, unless the service representative already knows
13 the PIC code for U.S. West. I mean, there are certain
14 carriers for whom the PIC codes become very familiar
15 fairly quickly.

16 **COMMISSIONER GARCIA:** I would assume that
17 that would be Mr. Melson's person who would be
18 accessing this, so they would obviously know their
19 company's change code, right?

20 **WITNESS CALHOUN:** Yes.

21 **COMMISSIONER GARCIA:** So they wouldn't have
22 to scroll through the list.

23 **WITNESS CALHOUN:** Right.

24 **COMMISSIONER CLARK:** Let me ask a question
25 again. All the S's don't necessarily appear together

1 then?

2 **WITNESS CALHOUN:** No. And what I'm looking
3 at here is they -- if you look in the far right
4 column, the ACNA code, the access carrier name
5 abbreviation, what it appears to me is that they're
6 appearing in random alphabetical order, but the
7 alphabetization is being done by the ACNA code as
8 opposed to the actual name of the carrier.

9 **Q** **(By Mr. Melson)** Ms. Calhoun, to follow up
10 on Commissioner Garcia's question, if the customer
11 said "I want MCI for local service, but I'm really
12 happy with U.S. West, and I'd like to choose them,"
13 does MCI have the option of saying "We're sorry, we
14 don't allow our customers to choose any carrier for
15 long distance but MCI," if you know?

16 **A** Are you asking me for a -- I mean, legally I
17 don't know.

18 **Q** All right. Rather than -- we've clicked
19 through about five screens at this point, and I guess
20 I'm afraid that if U.S. West's ACNA code starts with
21 "U," we've got several more to go.

22 So let's abandon this exercise and let's
23 just choose Midcom, since they're showing on the
24 screen now. How would that carrier now be chosen as
25 my intraLATA carrier?

1 A On your order you would enter the PIC
2 code 0648.

3 Q So at this point I need to either cut and
4 paste that or write it down so that when I move to my
5 EDI interface I know the correct code?

6 A Yes. Or as an ALEC, you could choose to
7 take the information that comes from LENS and use
8 software on your side of the interface to integrate it
9 with your ordering system.

10 Q Let me ask this: When a customer says to a
11 BellSouth customer service representative, "I don't
12 know what carrier I want, could you read me a list,"
13 that comes up in random order; is that correct?

14 A Yes.

15 Q If the customer says, "I want U.S. West,"
16 isn't it true that the customer service representative
17 just begins typing that name in, and as soon as it
18 gets to U.S. West, it hops down in a list and displays
19 that carrier and code?

20 A Yes. And that's the same search capability
21 that I said earlier that we would add to LENS.

22 Q But that capability does not exist today?

23 A That's right.

24 **COMMISSIONER DEASON:** When will that be
25 available?

1 **WITNESS CALHOUN:** I'm not sure of the date
2 of that.

3 **COMMISSIONER DEASON:** Is it weeks or months
4 or years?

5 **WITNESS CALHOUN:** It's in the category of
6 weeks or, you know, a month or two. It's not a long
7 period of time, but it's certainly not years.

8 And, you know, again, I guess it kind of
9 points up the fact that, yes, there may be some
10 differences, but what the FCC required was that CLECs
11 be given information that gives them a meaningful
12 opportunity to compete; and not being able to
13 immediately find another interexchange carrier for a
14 CLEC who happens to be an interexchange carrier
15 themselves, it doesn't appear to affect their
16 meaningful opportunity to compete over a short period
17 of time.

18 **Q** Could you imagine a situation in which a
19 customer might get frustrated with staying on the
20 phone with a representative while he or she was
21 clicking through a number of screens attempting to
22 find U.S. West?

23 **A** It's possible.

24 **COMMISSIONER GARCIA:** But I guess it would
25 also be possible that the person who was screening

1 through these would have these codes in alphabetical
2 order before them anyway in a hard copy; is that not
3 correct?

4 WITNESS CALHOUN: They could, yes.

5 COMMISSIONER GARCIA: So if the occurrence
6 happened that Mr. Melson's -- or MCI wanted to give
7 U.S. West as a long distance provider, that service
8 representative could just scroll through it and find
9 that because that would probably not be a usual
10 occurrence?

11 WITNESS CALHOUN: If I were an ALEC and I
12 had a predetermined relationship with an interexchange
13 carrier or a set of interexchange carriers, then yes,
14 the service representatives would have that
15 information available to them.

16 Q (By Mr. Melson) Let's move to the next
17 portion of this screen. Is this where we see the
18 service features that are available in this office?

19 A Yes.

20 Q And is there a way to expand that list and
21 see some more of it?

22 A We can scroll down through it.

23 Q Now, can everything that we're seeing on
24 this list be ordered through the EDI interface?

25 A No. This is the list of every service that

1 BellSouth offers, including the complex services that,
2 as I described earlier even for BellSouth retail
3 customers, are handled on a manual basis.

4 Q Does this screen indicate at all which
5 services can be ordered through EDI and which services
6 have to be ordered on a manual basis?

7 A No.

8 Q Can we check on the availability in this
9 office of call waiting? How is that done?

10 A You would click on "custom calling".

11 COMMISSIONER GARCIA: Can we go back for a
12 second? So there are services there that are offered
13 that I would not be able -- that Mr. Melson would
14 not -- or MCI would not be able to offer the customer,
15 and yet they're listed, and there's no way that that's
16 coded for me to be able to know that I'm not being
17 able to offer that?

18 WITNESS CALHOUN: No. All BellSouth's
19 services are available for resale. He would be able
20 to offer his customers any service that BellSouth has
21 available for resale. His question was, are there
22 services here -- can he order every service here
23 through the electronic data interexchange, ordering --

24 COMMISSIONER GARCIA: Every service that's
25 listed there, you do -- Mr. Melson or MCI would be

1 able to directly access through this list, every
2 single service that's scrolled through here?

3 **WITNESS CALHOUN:** I'm not sure I totally
4 understand your question.

5 **COMMISSIONER GARCIA:** Through this listing
6 of services, any service that would be accessed by MCI
7 from here, any pick that they would take would be fine
8 and you would be able to offer that service?

9 **WITNESS CALHOUN:** What this list shows is a
10 list of all the services that BellSouth offers, and
11 what we're going to do by looking at the detail behind
12 the service is see whether it's available for this
13 particular office for this location.

14 **COMMISSIONER GARCIA:** Got you.

15 **MR. MELSON:** Before we do that, let me just
16 ask a clarifying question to follow up.

17 **Q** **(By Mr. Melson)** My understanding is this
18 list shows everything that is available from
19 BellSouth; is that correct?

20 **A** Yes.

21 **Q** It includes both things that can be ordered
22 electronically by the CLEC and things that must be
23 ordered manually by the CLEC; is that correct?

24 **A** Yes.

25 **Q** And it does not distinguish between those

1 two categories?

2 A That's right.

3 Q Let's check now on the availability of call
4 waiting. We have scrolled down through the list.
5 We've highlighted "custom calling". We now click on a
6 button that says "show features for service;" is that
7 correct?

8 A Yes.

9 Q And then we are presented with another
10 sublist that shows a number of custom calling
11 features; is that correct?

12 A Yes. This shows the individual features in
13 the group or the family, custom calling, and it shows
14 that call waiting is available.

15 Q All right. Now, my customer says, "I'm
16 going to want to order call waiting." At that point I
17 make some note of the USOC for that service to be used
18 in placing my EDI order later; is that correct?

19 A Yes.

20 Q Let's say that's the only -- well, I guess
21 if I'm going to order call waiting, I probably need to
22 order a basic residential service to go with it.
23 Where do I get the USOC for that?

24 A For your EDI order, you would get that from
25 the local exchange ordering guide. All of the valid

1 classes of service are provided there.

2 Q So the classes of service I get from the
3 guide, the features and functions I get from this LENS
4 screen?

5 A Yes.

6 Q Let's return to the switch details. Is
7 there anything else that in the normal course of
8 interaction with a customer that I'm going to need to
9 do in the features and services screen?

10 A No, not that I can think of.

11 Q Let's go back to the main menu. Let me ask
12 this: If this interaction was with a BellSouth
13 customer service representative using RNS, and the
14 customer said "is call waiting available," isn't it
15 true that the BellSouth representative would find that
16 out by typing "call waiting" into a box and having the
17 system scroll down to that point in a list, if you
18 know?

19 A They would first have to click to get them
20 to the part of the system that showed them that
21 information; and then at that point, yes, they could
22 type in a feature name.

23 Q Now, the customer says "I'd like to know
24 when this service is going to be -- when the service
25 can be installed. I would then go back to the main

1 menu, would I not, and select "view installation
2 calendar"?

3 A Yes.

4 Q Now, before we move on, if we're doing here
5 a new installation rather than a change "as is" or
6 change "as specified" of an existing service, if we
7 were doing a change "as is" or a change "as specified"
8 that involved only addition or subtraction of central
9 office switch type features, there would be no need to
10 visit this particular menu; is that correct?

11 A That's right.

12 Q Because that's subject to the in by 3:00,
13 out same day rule we talked about earlier?

14 A Yes.

15 Q Let's proceed here. Click "okay". Now, the
16 address has to be validated now for the third time; is
17 that correct?

18 A Yes, if you're doing all these functions
19 together.

20 Q So it comes back valid and we click "okay"
21 to move then to the next screen. The application has
22 generated an exception, "Start a new session or press
23 the back key to resume operation." What does that
24 mean?

25 A I'm not entirely sure. I'm not entirely

1 sure. It may be a Netscape error.

2 Q Let's try the back key. (Pause) We've gone
3 back two screens and are attempting to revalidate the
4 address. "Get a valid address." Click "okay."

5 Now, that generated the same error, so we've
6 now backed all the way out to the installation
7 calendar and we're trying it again. Enter the address
8 information, click "validate," get a message that it's
9 a valid address, click "okay".

10 Let me ask, is there going to be a way, do
11 you know, to view the installation calendar for this
12 address?

13 A Yes.

14 Q Does it require starting a new session at
15 this point?

16 A I would probably try that first. I'm not
17 sure exactly what -- if that's what a CLEC would be
18 told to do. There's a help desk that's available for
19 the CLECs if they're having any kind of systems
20 difficulties.

21 The BellSouth service representative in this
22 situation has a system administrator that they would
23 call if they were experiencing any kind of unusual
24 message from the system, and CLECs have a point of
25 contact within BellSouth that they could call if that

1 were necessary. But if it were me, I would just log
2 in and start over again.

3 COMMISSIONER CLARK: Do you think it has
4 anything to do with that there's no living unit there?

5 WITNESS CALHOUN: Again, I have no idea.
6 I'm not sure what's causing that. It doesn't say
7 which application. I don't know if that's a Netscape
8 message or that's a LENS message. I don't know.

9 MR. MELSON: Commissioner Clark, it has been
10 represented to be by somebody who has used this
11 address for a similar demonstration in the past that
12 it normally works. I frankly was not expecting to see
13 that screen.

14 COMMISSIONER GARCIA: I was just curious how
15 you found it not to work.

16 MR. MELSON: Actually, I was pleased I saw
17 it, but I wasn't expecting it.

18 COMMISSIONER CLARK: And what does "no
19 living unit" mean? Does it mean there's no structure?

20 WITNESS CALHOUN: Yeah. It means that we
21 don't have any information about --

22 COMMISSIONER CLARK: A facility being there?

23 WITNESS CALHOUN: Uh-huh.

24 COMMISSIONER CLARK: Okay.

25 Q (By Mr. Melson) While we're waiting, we

1 have logged onto the system again, gone back into the
2 "view installation calendar" mode, are in the process
3 of revalidating the address. While that is going on,
4 have you seen that error screen previously?

5 A Yes, I've seen it once or twice in the past.

6 Q And do you know what type of system error
7 that represents?

8 A I don't.

9 COMMISSIONER CLARK: Would a manual tell you
10 what that means? Do you get a manual with these
11 systems?

12 WITNESS CALHOUN: You do get a manual. And
13 a copy of the LENS user guide was filed with my
14 prefiled testimony. Whether that particular message
15 is in it or not, I don't know.

16 - - - - -

17 (Transcript continues in sequence in
18 Volume 12.)

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1 billing name, et cetera, has been prepopulated by the
2 system and doesn't have to be put in each time by the
3 service representative.

4 Continuing on, again we have prepopulated
5 information. This is the remarks section of the order
6 and we would indicate here that we were ordering an
7 unbundled loop.

8 Q Now, is just typing "loop" the standard for
9 how one fills out that remarks section?

10 A I believe there may be additional codes that
11 go here, but, you know, again, I'm not a service rep
12 and without doing it with the documentation, I can't
13 tell you exactly what those codes are. But if memory
14 serves me correctly, there are three items of
15 information that go in this particular section that
16 identify the loop. I think you'd want to identify,
17 you know, whether it was a 2-wire loop, for example,
18 or what type of loop. I just don't recall what the
19 codes for those are.

20 Q Would you accept, subject to check, that as
21 of the last week in August, BellSouth had not provided
22 information to MCI on how to complete this remarks
23 section when one was ordering unbundled elements?

24 A I would want to check that.

25 Q All right. And then you would, from this

1 point -- this is really as far as I wanted to go. You
2 have to type text into a "remarks field" in order to
3 place an order for an unbundled element through LENS?

4 A Yes.

5 COMMISSIONER CLARK: Let me ask you a
6 question: Could the ALEC prepopulate that so you
7 didn't have to type it in?

8 WITNESS CALHOUN: I don't -- as part of the
9 user profile, do you mean?

10 COMMISSIONER CLARK: You said there was
11 information that they could, you know.

12 WITNESS CALHOUN: Right. They certainly
13 could have that information already created in another
14 application that could just be pasted in here. You
15 know, but again, the industry standard method for
16 ordering the unbundled loop is through the EDI process
17 and there there are fields and drop-down boxes and
18 places to put in their required information.

19 Q (By Mr. Melson) Ms. Calhoun, if one was
20 using either EDI or LENS and wanted to place an order
21 for something that is not on the list of 30 services
22 or 34 services, how is that order placed?

23 A Well, I think it depends on the type of
24 order that it is. For complex services, primarily the
25 services that have been mechanized are complex