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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of :DOCKET NO. 960786-TL
BellSouth Telecommunications, :
Inc.'s entry into interLATA :
services pursuant to Section 271 :
of the Federal Telecommunications :
Act of 1996. :
:

THIRD DAY - AFTERNOON SESSION

VOLUME XII

PAGE 1304 through 1379

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 12:00 p.m.
PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida
REPORTED BY: NANCY S. METZKE, RPR, CCR

APPEARANCES:
(As heretofore noted.)

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FPSC-RECORDS/REPORTING

I N D E X

PAGE NO.

WITNESSES

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GLORIA CALHOUN

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ID. ADMTD.

#47 Printout of LENS screens 1322

#48 Memorandum dated 9/2/97
from J.M. Baker, Re, due
dates on LENS resale
orders 1328

#49 August 22nd letter to Georgia
PSC and Attachment 15 1359

1 P R O C E E D I N G S

2 (Transcript continues in sequence from Volume)

3 GLORIA CALHOUN

4 Continues her testimony under oath from Volume:

5 CONTINUED CROSS EXAMINATION

6 BY MR. MELSON:

7 Q That would be Exhibit GC-30?

8 A I'll have to check.

9 Q Commissioners, to move things along, since we
10 have been sitting here a couple of minutes, and it looks
11 like the system is in a wait mode trying to validate this
12 address, this was sort of the last screen I was going to
13 view. I think I can do this verbally based on the
14 recollection of what we saw yesterday; so to move things
15 along, let me do that.

16 Yesterday, Ms. Calhoun, during the demonstration
17 we saw an installation calendar, and do you have as one of
18 your prefiled exhibits a photocopy of an installation
19 calendar screen? We are seeing a message here that gives a
20 date, a time, sync, contract, failed response, timed out.

21 A Right. It means that the system didn't respond
22 within a pre-determined time. That same kind of message is
23 set up for BellSouth's retail systems.

24 Q Do you have any -- does BellSouth conduct any
25 measurement of the frequency of getting these types of

1 error messages either on its own systems or on the systems
2 that it provides to ALECs?

3 A On the first part of your question, on
4 BellSouth's retail systems, I'm not sure about measurements
5 per se. I know that there are some objectives for the
6 percentage of time that the system should be available. In
7 terms of the CLEC systems, I think it's the same. There is
8 an objective percentage, but questions about performance
9 measurements would probably be better directed to
10 BellSouth's performance measurements witness.

11 Q Hopefully he is watching. Is there, do you have
12 in your prefiled exhibits a copy of the view installation
13 calendar screen?

14 A I believe I do, but I'm looking, so if you
15 could --

16 Q I am also, so --

17 A Give me just a minute.

18 (Witness reviewed documents)

19 A There is one in the LENS user guide that is, I
20 think we determined was Exhibit GC-30, and there is one on
21 page 20.

22 Q All right. I found that. Page 20 of Exhibit
23 GC-30, which is part of Exhibit 42. In looking at that
24 document, at the top of the page, that shows days of the
25 week, shows whether the office is open or closed; is that

1 correct?

2 A Yes.

3 Q And in the middle of the page it shows work
4 interval for various types of functions that require a
5 premises visit; is that correct?

6 A Yes.

7 Q And at the bottom of the page it shows dates that
8 are not available; is that correct?

9 A Yes.

10 Q And let's -- using page 20 as an example, if
11 today were May the 10th, how would I walk through this
12 screen and determine the date that could be promised the
13 customer?

14 A You would look at the interval for the type of
15 installation that was being done and -- well, that's the
16 first thing you would do, is you would determine when the
17 customer wanted service.

18 Q I want it yesterday.

19 A Okay. And if you just wanted to calculate what
20 the next available due date would be or determine the next
21 available due date, you would match the interval, which is
22 stated in business days, for the particular type of service
23 with the days that are available, or in this case, actually
24 the days that are not available.

25 Q Okay. We are on May 9th, and I am installing one

1 new residential line. Can you walk me through figuring out
2 what the due date will be?

3 A Yes. We are on May 9th, and that counts as the
4 zero day, so two business days would be May 11th, but we
5 see that May 11th, May 12th and May 13th are closed, so the
6 first available day would be May 14th.

7 Q And at that point, the installation interval is
8 two days. Do I count two days from that point?

9 A No. It's two days --

10 Q Excuse me.

11 A It's two days, but then you go to the next
12 available day if that's past two days.

13 COMMISSIONER GARCIA: Right. It's two days from
14 the day it's ordered?

15 WITNESS CALHOUN: Yes.

16 COMMISSIONER GARCIA: And if it's not available
17 then it moves up?

18 WITNESS CALHOUN: To the first available day.

19 Q And the list -- I believe we observed this
20 yesterday, but the list of dates that is not available is
21 not in chronological order; is that correct?

22 A Yes, that's right. The Georgia list was, and
23 again, I pointed out that there are some differences in
24 data bases among states.

25 COMMISSIONER DEASON: Is there any reason why

1 it's the days that are not available as opposed to the days
2 that are available that are listed? Wouldn't it be easier
3 and more user friendly to just list the days that are
4 available for an installation as opposed to the days that
5 are not available?

6 WITNESS CALHOUN: It may be. Again, this is the
7 installation calendar that is kept updated by BellSouth's
8 network. This is not something new for CLECs. This is
9 something that BellSouth has used, and this is the way the
10 network organization has historically kept up with what
11 installation dates were available, and this is their way of
12 saying we know we are closed on this day. That might have
13 been a better way to approach it.

14 COMMISSIONER DEASON: What about now, I notice
15 in, I believe it was yesterday that we looked at a page for
16 a different central office, and for that central office
17 Sunday was not an available day, it was closed?

18 WITNESS CALHOUN: Right. Yes.

19 COMMISSIONER DEASON: Now I don't know when May
20 the 14th is, but let's assume that was a Sunday and we were
21 dealing with a central office that was closed on Sunday,
22 how would we know that without having a calendar to show
23 that May 14th was a Sunday, assuming that was a Sunday?

24 WITNESS CALHOUN: I think you'd have to look at
25 the calendar. And what I have done in that situation is my

1 computer system has a calendar function in it, and I've
2 just opened the calendar and had it sitting there
3 simultaneously with the installation calendar from LENS.

4 BY MR. MELSON:

5 Q Ms. Calhoun, let me now ask you how a
6 BellSouth -- well, strike that.

7 I believe you told us yesterday during your
8 demonstration that the ALEC sees the same installation
9 calendar as the BellSouth representative. Do you recall
10 that testimony?

11 A Yes.

12 Q Could you turn to your Exhibit GC-12, which is
13 part of Exhibit 41.

14 (Witness reviewed document)

15 Q And this is the installation calendar that a
16 BellSouth customer service representative using RNS sees;
17 is that correct?

18 A Technically it's not -- an installation calendar
19 is a term of art. This is a due date window in RNS that is
20 used to calculate a due date for a particular activity, so
21 it's a due date screen; but the installation calendar
22 itself is underlying this, and the actual installation
23 calendar can be viewed separately.

24 Q If you were a BellSouth customer service
25 representative, would you normally view this due date

1 calculator screen rather than the underlying installation
2 calendar?

3 A Very often, you would, yes. You would look at --
4 I mean typically you would -- Let me make sure I
5 understand your question. I think your question is --
6 Maybe you better state it again.

7 Q I guess my question is if during a customer
8 contact between a BellSouth representative and a customer,
9 when the BellSouth representative is quoting a due date to
10 the customer, is the screen under -- identified as Exhibit
11 GC-12 the screen the customer representative typically goes
12 to?

13 A For a residence customer, in most situations,
14 yes. Although there have been occasions, and I wouldn't
15 call them rare, that I have seen residence customers use
16 the installation calendar as well; and the difference is
17 one that I described at length in my prefiled testimony.
18 There is a difference between using the installation
19 calendar and actually calculating a due date where you are
20 giving the system information on everything that's being
21 ordered and letting the system do the evaluation, and so
22 there are two separate things being done here.

23 The installation calendar is used when you are
24 trying to determine a due date, but the ordering process is
25 taking place separately, and the due date screen in RNS is

1 part of the actual ordering process. The system has actual
2 ordering information to evaluate.

3 Q That was probably more of an answer than I
4 bargained for. Let me try it this way: If an ALEC is
5 using the inquiry mode of LENS to obtain, to estimate a due
6 date that it can provide to a customer and can use to fill
7 in the blank on the EDI order, do they use the installation
8 screen -- excuse me, the calendar screen that we looked at
9 in Exhibit GC-30? And that's a yes or a no.

10 A Yes.

11 Q And if a BellSouth customer service
12 representative was taking an order for service and was
13 giving the customer a due date that would then flow in as
14 the requested due date in BellSouth's downstream systems,
15 is GC-12 the calendar that the residential rep would look
16 at?

17 A For residence customers, yes, not for business
18 customers.

19 Q Now this Exhibit GC-12 is not in color, is it?

20 A No.

21 Q Thank you. The actual screen the representative
22 sees is in color; is that right?

23 A Yes.

24 Q And isn't the first available due date on that
25 calendar highlighted in a color? I believe it's green, but

1 it's highlighted in a different color from the other dates
2 on the calendar?

3 A Yes.

4 Q And in this case we are looking at April rather
5 than May, but let's say it was Friday the 11th, and the
6 first date available was showing to be the -- or the date
7 offered came back as the 17th, and the customer said, well,
8 can't you do it quicker than that, aren't the dates the
9 office is unavailable outlined in black?

10 A Yes.

11 Q So that the customer -- if in fact the 13th,
12 14th, 15th and 16th were not available, the customer rep
13 could tell at a glance that those were dates that were for
14 some reason the office was closed or fully booked?

15 A Yes.

16 MR. MELSON: I need just a minute.

17 COMMISSIONER DEASON: While he is doing that, let
18 me ask a question. If the example given by Mr. Melson
19 showed that the first available installation date was the
20 17th, what would it matter if the office was closed -- if
21 that is the first installation date, what does it matter?
22 I mean that is going to tell you that there is no date
23 sooner than that; is that correct?

24 WITNESS CALHOUN: Right.

25 BY MR. MELSON:

1 Q Could you turn to your -- I'm going to leave the
2 demonstration mode now. I think I'm finished with that.
3 Could you turn to page 38 of your rebuttal testimony
4 please?

5 COMMISSIONER GARCIA: What page?

6 MR. MELSON: 38 of the rebuttal.

7 Q At lines 9 through 12 you state the fact is that
8 BellSouth's ordering and provisioning systems can
9 electronically accept orders for unbundled network elements
10 today. Do you see that?

11 A Yes.

12 Q By electronically accept, do you mean an order
13 can be transmitted electronically to BellSouth; is that
14 correct?

15 A Yes.

16 Q Those orders do not flow through BellSouth's
17 systems to create a mechanized -- to generate a mechanized
18 order; is that correct?

19 A Yes.

20 Q Can EDI be used to order a NID network interface
21 device?

22 A Yes.

23 Q Can it be used to order unbundled loop
24 distribution?

25 A I don't know.

1 Q How could unbundled loop distribution be ordered,
2 if you know?

3 A I just am not familiar enough with that service
4 to know the ordering process for it. I believe that was
5 covered in Mr. Milner's testimony.

6 Q Now I want to focus -- it's a topic we touched on
7 briefly earlier, but let me come back to it, what I'm going
8 to call rejected orders, orders that were successfully
9 transmitted to the system but for some reason are rejected
10 by a downstream system such as LEO or LESOG or SOCS. I
11 believe that you told me that with a couple of limited
12 exceptions, rejects in EDI come back to the local customer
13 service center rather than coming back electronically to
14 the ALEC; is that correct?

15 A I don't remember saying in a couple of limited
16 exceptions, but I think the ones we've talked about earlier
17 we said would go to the local carrier service center for
18 handling.

19 Q The ones that go to the local carrier service
20 center, if that is something that the -- well, strike
21 that.

22 When the reject comes to the local carrier
23 service center, what does the BellSouth representative in
24 that center do?

25 A Well, they would have to analyze the order to

1 find out what had caused the reject, and they could then
2 make a determination as what needed to be done.

3 Q What are the options available to the local --
4 LCSC representative for dealing with that reject? I mean
5 what is it that might need to be done?

6 A One type of reject we'll see is, for example,
7 when an address is validated, the system, the LENS system
8 would return a message saying that the address was valid,
9 but there may be an apartment number involved. If the CLEC
10 then ignores that and doesn't put an apartment number on
11 where one might have been required, then the system would
12 reject that, and the local carrier service center would
13 need to add that and then let the order go on.

14 Q And how does the local carrier service center
15 know what apartment to put in?

16 A It may be something that is fairly apparent by
17 looking at the customer's record, or it may be something
18 that they would need to get clarification from the CLEC on.

19 Q And if it's something -- if the reject needs to
20 be communicated back to the CLEC, how is that communication
21 made?

22 A Either by telephone or by fax.

23 Q Now if RNS or DOE reject an order that has been
24 placed by a BellSouth customer service representative, all
25 of those rejections are communicated back electronically to

1 the person or group who will ultimately deal with fixing
2 the error; is that correct?

3 A Yes. There is an error correction group that
4 receives orders that are rejected.

5 Q So there is never a fax or a phone call to
6 communicate that information?

7 A Well, at that point the person handling the error
8 might need to call the customer who originally placed the
9 order to get the information.

10 Q I understand that BellSouth is not relying on
11 LENS ordering capability to satisfy its requirement of
12 nondiscriminatory access. Can you tell me why BellSouth
13 then offers an ordering capability in LENS?

14 A Yes. Ordering capability was initially designed
15 in LENS under the thinking that EDI, as I described
16 yesterday, has historically been used only by large
17 carriers. We, as I also explained yesterday, arranged to
18 make the benefits of EDI available to small carriers as
19 well. So LENS is still available as an option, as an
20 ordering option.

21 Q I'm going to ask hopefully a short series of
22 questions about the ordering function in LENS. If an ALEC
23 customer service representative is placing an order through
24 LENS and they get to the end, they've completed the order,
25 they are about to transmit it to BellSouth, is there a way

1 for the LENS user to see the entire order before it's
2 submitted?

3 A No.

4 Q Can a LENS user view a pending order? And by a
5 pending order I mean one that has been transmitted to
6 BellSouth and is now in the process of being worked.

7 A No.

8 Q Can a LENS user make a change to a pending order?

9 A No.

10 Q And I believe LENS cannot be used to make a
11 change to the service of an existing ALEC resale customer;
12 is that correct?

13 A That's correct. All of the capabilities you've
14 just described, all of those ordering capabilities are
15 available in the industry standard EDI ordering interface.

16 COMMISSIONER CLARK: Let me just be clear. If
17 you have -- you use LENS for pre-ordering and you've sent
18 it in and you want to make a change, you use EDI?

19 WITNESS CALHOUN: No. You use LENS for ordering
20 and send your order in via EDI. If you want to make a
21 change to the order, you make the order through EDI. You
22 know, what we are getting into here is that LENS has a
23 pre-ordering capability and an ordering capability, and
24 BellSouth is only relying on the pre-ordering capability
25 for providing access to pre-ordering information in

1 substantially the same time and manner that we have it for
2 ourselves.

3 COMMISSIONER CLARK: Okay.

4 Q If an ALEC places an order using EDI and then
5 makes a change to that order while it is pending, does that
6 affect the due date?

7 A It depends on what the nature of the change is.
8 There are some changes that could affect the due date. The
9 same is true for BellSouth's retail customers.

10 Q Are there situations in which making a change
11 through -- an ALEC making a change through EDI affects a
12 due date while a comparable change made by a BellSouth
13 representative through RNS does not affect the due date?

14 A I can't think of any.

15 Q I believe in demonstrating the LENS earlier we
16 talked about a conversion as specified, and I believe you
17 told me that if a customer wants to change from BellSouth
18 to an ALEC and wants to add a feature that you need to
19 indicate on the order all of the features the customer will
20 have after the conversion?

21 A Yes, and that's determined -- that procedure is
22 determined by the industry at the OBF.

23 Q And did I also understand that if the only change
24 is to add call waiting that there is no need to view an
25 installation calendar to calculate a due date because

1 that's subject to the in-by-three, out-same-day rule?

2 A Yes, for the particular feature example we used
3 before.

4 Q All right.

5 WITNESS CALHOUN: Excuse me, I wonder if I might
6 have a quick break.

7 CHAIRMAN JOHNSON: Mr. Melson, how much more do
8 you have?

9 MR. MELSON: I am close to the end. I have more
10 than two questions.

11 CHAIRMAN JOHNSON: We are going to go ahead and
12 take a lunch break. We'll reconvene at one o'clock.

13 (Lunch recess)

14 CHAIRMAN JOHNSON: We'll go back on the record.
15 Mr. Melson.

16 MR. MELSON: Commissioners, I have handed out a
17 document. It's got a handwritten number 974518 in the
18 middle of the top of the page. Could I ask that that be
19 identified as the next exhibit?

20 CHAIRMAN JOHNSON: Okay. This will be Exhibit
21 47. It's BellSouth local exchange navigation system.

22 MR. MELSON: And Commissioners, this is a
23 printout of a series of LENS screens.

24 CHAIRMAN JOHNSON: Okay. Then give me a short
25 title for exhibit 47.

1 MR. MELSON: Printout of LENS screens.

2 BY MR. MELSON:

3 Q Ms. Calhoun, before we look at this specific
4 printout, you testified earlier that there was a difference
5 in LENS between the installation calendar which is used to
6 estimate an installation interval and the calculation of a
7 due date. Am I recalling that correctly?

8 A Yes.

9 Q Can you tell me at what point in the process of
10 placing an electronic order via EDI that a due date is
11 actually calculated?

12 A When the order reaches the service order control
13 system.

14 Q So after the order has been completed by the ALEC
15 representative and transmitted to BellSouth, it's in one of
16 the downstream systems that the committed due date is
17 assigned; is that correct?

18 A Yes.

19 Q And when that happens in EDI, how does the ALEC
20 get notice of what that committed due date is?

21 A It's included on the firm order confirmation.

22 Q So that's an electronic message that comes back
23 through EDI and says your order is confirmed and here is
24 the due date?

25 A Yes.

1 Q And when one uses LENS in the ordering mode, does
2 LENS do a similar due date calculation in that it goes out
3 and calculates a committed due date based on information in
4 BellSouth's systems?

5 A Yes, a combination of BellSouth systems and the
6 information that is on the order.

7 Q And does the same -- when a BellSouth customer
8 service representative calculates a due date, does that go
9 out and touch the same downstream BellSouth systems to
10 calculate the due date?

11 A Yes.

12 Q Let me ask you to turn, if you could, to Exhibit
13 47 and --

14 A Is that the 974518?

15 Q Yes, ma'am. And let me ask you first to look at
16 the date and time in the, on the bottom of the first page.
17 Does this appear to have been printed on September 2nd at
18 10:30 in the morning?

19 A Yes, it appears that way. Of course I have no
20 way of knowing for sure.

21 Q And if you could flip briefly through this
22 document and see if it looks in general like the series of
23 screens that one would use to place a firm order via LENS
24 for what we call a conversion as specified?

25 A In general it does, yes.

1 Q All right. Let me ask you to look first at the
2 customer record. I thought I had violated the Commission
3 rule on numbering the pages, but then I discovered that the
4 fax machine did that for me in the upper right-hand corner,
5 and if we accept an exhibit beginning with page 2, I've got
6 numbers I can refer to.

7 Ms. Calhoun, the customer record on pages 2 and 3
8 of the fax show a number that currently has call return
9 blocking, repeat dial blocking, and custom toll restriction
10 as features; is that correct?

11 A Yes.

12 Q Page 4 is the screen to place a firm order for a
13 conversion as specified with new services and features
14 being requested; is that correct?

15 A Yes.

16 Q Page 7 which is part of the available features
17 and services screen shows in the middle of the page that
18 call waiting is available to serve this number and that the
19 USOC for that service is ESSX, correct?

20 A Yes.

21 Q Page 10 in the administrative section shows a
22 desired due date of today; is that correct?

23 A Yes.

24 Q And I believe you testified before the lunch
25 break that a conversion as specified which involved only

1 the addition of a single central office feature such as
2 call waiting one did not have to consult the interval
3 calendar, one could simply put it in today if the order was
4 submitted before 3 p.m.; is that correct?

5 A Yes.

6 Q Turn, if you would, to pages 17 and 18. I guess
7 that's actually a single screen, but let's turn to page
8 18. Do you see there that four features are being added to
9 this line, namely, ESSX, which is the new call waiting, and
10 then the three preexisting services, call return blocking,
11 repeat dial blocking and custom toll restriction?

12 A Yes.

13 Q And I believe you testified that on a conversion
14 as specified you had to list everything that was going to
15 be in place after the conversion?

16 A Yes.

17 Q Now look on page 21, if you would, and that's the
18 determine due date screen, and in the LENS firm ordering
19 mode, determine due date is the last thing one does before
20 one submits the order; is that correct?

21 A Yes.

22 Q And that's because the due date calculator needs
23 to know what the order involves in order to return an
24 accurate due date?

25 A Yes.

1 Q And page 21 shows desired due date of September
2 2nd, which is the same date that appears in the lower
3 left-hand corner of all of these pages, and it shows
4 anytime on the second; do you see that?

5 A Yes.

6 Q Turn to the last page, page 22, is this the
7 screen that is returned by LENS indicating a calculated due
8 date of September 5th?

9 A Yes.

10 Q And so in this instance, even though there is a
11 conversion as specified with the addition of a feature, the
12 BellSouth system is saying that we are not going to do that
13 in by three, out this afternoon, we are going to give you a
14 due date of September 5th; is that correct?

15 A Yes. All of the users of LENS have been notified
16 by an industry letter that we have received some unexpected
17 results on due date calculation in the firm order mode, and
18 this is an example of one such unexpected result. Again,
19 BellSouth is not relying on the ordering capabilities of
20 LENS; we are relying on the industry standard EDI ordering
21 method, and this a problem that we had identified. We've
22 notified the CLEC community that it exists, given them
23 procedures to follow in the interim and are working to
24 correct the problem.

25 Q And was the industry notified of this by a

1 memorandum from BellSouth dated September 2nd, 1997?

2 A Yes.

3 Q And that would have been Tuesday of this week; is
4 that correct?

5 A Yes.

6 Q Let me have a copy of that letter distributed and
7 ask if this is a letter by which the notification was made.

8 (Document distributed)

9 A Yes.

10 Q Let me ask you --

11 MR MELSON: Well, first let me ask that this
12 document, memorandum dated September 2nd, 1997 from J. M.
13 Baker, Re, due dates on LENS resale orders be identified as
14 Exhibit 48. Chairman Johnson, I'm sorry, could we identify
15 this as Exhibit 48, please?

16 CHAIRMAN JOHNSON: It will be identified as
17 Exhibit 48.

18 BY MR. MELSON:

19 Q Ms. Calhoun, would you move to the last, the
20 third paragraph of this letter and read the second sentence
21 beginning with the words "Meanwhile?"

22 A I'm sorry, were you asking me to --

23 Q Yes, could you read that aloud, please?

24 A "Meanwhile, if you are placing orders through
25 LENS for conversions as specified or for new installations

1 and the LENS order disagrees with the due date table,
2 please submit the LENS order with the calculated due date,
3 and then contact the local carrier service center for
4 assistance. If you are placing orders through the industry
5 recommended electronic data interchange ordering interface
6 or are issuing orders for conversion 'as-is' through LENS,
7 please continue to establish due dates as usual."

8 Q Let me ask you, if you are placing orders through
9 EDI, what is the usual method to establish due dates?

10 A The usual method of establishing due dates is to
11 consult the table of installation intervals, follow the
12 business rules, for example, for in by three, same day due
13 date or to use that information in conjunction with the
14 installation calendar for services requiring a premises
15 visit.

16 Q Does BellSouth -- has BellSouth ever recommended
17 to CLECs that they may choose to use the firm order mode of
18 LENS to perform pre-ordering functions?

19 A Yes, that's an option that is available.

20 Q And if an ALEC were using the firm order mode of
21 LENS to perform pre-ordering functions and requested a
22 committed due date as shown on Exhibit 47, they would have
23 got a delayed due date for an order that involved only a
24 feature addition; is that correct?

25 A They may have. As this letter indicates, the

1 indication is that in the middle of the second paragraph,
2 may not always be calculating the correct due date for
3 those orders for some locations.

4 Q Let me ask this, do you know the percentage of
5 orders and locations for which an incorrect due date is
6 calculated?

7 A I don't. BellSouth just identified this problem
8 late Friday afternoon, evaluated it over the weekend,
9 notified the carriers immediately Tuesday, and has
10 proceeded to continue with its corrective action.

11 Q You discovered the problem on Friday?

12 A Yes.

13 Q Were you personally made aware of the problem
14 during your cross examination in Kentucky on Tuesday of
15 last week?

16 A I was not.

17 Q Let me ask you now about jeopardies, and that's a
18 term I don't believe we have defined yet. What does a
19 jeopardy mean to you?

20 A There are different meanings for the term
21 "jeopardy." Generally we talk about jeopardies in terms of
22 due dates that are not met.

23 Q So jeopardy would arise when a customer had been
24 given a committed due date and then for some reason due to
25 downstream problems or processing that date could not be

1 actually met?

2 A It could be for any number of reasons, not just
3 downstream processing. It could, in fact, be for
4 customer-caused reasons.

5 Q Well, let's assume we've got a non-customer
6 caused jeopardy. Could you turn to your Late-filed Exhibit
7 16, which is at page 398 of Exhibit 32 -- excuse me,
8 Exhibit 43, the big thick package that staff handed out
9 this morning.

10 A Which number?

11 Q It is Late-filed Exhibit Number 10. The question
12 here asks for procedures advising ALECs of missed due dates
13 in jeopardy situations including whether the process is
14 electronic or manual. Could you take a moment to read the
15 response to yourself?

16 A Yes.

17 Q The response is limited, is it not, to unbundled
18 loops?

19 A No.

20 Q All right. Then tell me, does this response
21 regarding jeopardy situations include orders for resold
22 services as well as orders for unbundled network elements?

23 A I'm concerned that we might be looking at two
24 different responses. As I recall, there was an earlier
25 response that was written in terms of unbundled loops that

1 did not in my opinion respond to the full question and a
2 revised version was provided.

3 Q I apologize. Let me find the -- Commissioners, I
4 am looking unsuccessfully for the second part of this
5 exhibit that the staff handed out this morning.

6 (Document tendered to Mr. Melson)

7 Q Thank you, and I apologize. Let me direct you
8 instead to Late-filed Exhibit 10, 9/4/97, which is page
9 398. Is this revised answer a more complete response to
10 the question?

11 A Yes.

12 Q And it indicates that except where there is a
13 customer-caused reason the ALEC is notified of the jeopardy
14 via a telephone call; is that correct?

15 A Yes.

16 Q Who is the person who calls the ALEC to advise
17 them of the jeopardy?

18 A I don't know the exact title of the person. It's
19 a network person, for lack of a better description.

20 Q Is it a person in the local carrier service
21 center?

22 A No.

23 Q Do you have any data on what percentage of firm
24 orders placed with BellSouth by ALECs result in jeopardy
25 situations?

1 A I do not. That's outside the scope of my
2 testimony.

3 Q All right. Is it fair to say at this point that
4 the LENS interface is being updated on a weekly basis?

5 A No, I don't think it is.

6 COMMISSIONER CLARK: I'm sorry, on a what basis?

7 MR. MELSON: Weekly.

8 Q Let me ask then, with what frequency are changes
9 currently being made to LENS?

10 A The next scheduled release of LENS I believe is
11 due October 8th.

12 Q What is the date on the current LENS user guide?

13 A One moment, I'll check.

14 (Witness reviewed document)

15 A June 17th, 1997.

16 Q Have there been several updates to LENS since the
17 date of the latest user guide?

18 A There have been some. Whether I'd call that
19 several, I can't recall exactly; but there have been some
20 changes, yes.

21 Q The next update to LENS is scheduled for October
22 8th. What frequency are changes contemplated after October
23 8th?

24 A I don't know.

25 Q How are changes to the LENS user guide

1 communicated to the CLECs who use LENS?

2 A There are a number of methods. One is that the
3 LENS user guide is distributed to CLECs who are using
4 LENS. It's also posted on a BellSouth interconnection
5 services Web site that can be accessed by CLECs through the
6 Internet and down loaded from there. It is also through
7 the interconnection services account teams.

8 Q Okay. Maybe my question wasn't clear. The last
9 changes to the LENS user guide were June 17th; is that
10 correct?

11 A Yes.

12 Q And that is the version that has been provided to
13 CLECs and is available on the Web; is that correct?

14 A Yes.

15 Q How have subsequent modifications to LENS since
16 the June 17th documentation been communicated to CLECs?

17 A I don't know of a specific method other than
18 through LENS itself. Some of the changes that have been
19 made have been to change things such as whether something
20 is -- how something is alphabetized which, you know,
21 changes are fairly self evident and wouldn't necessarily
22 require an update in documentation.

23 Q Would you agree with me that there are other
24 changes to LENS that may not be self evident?

25 A If you could give me a specific example, that

1 would probably be an easier way to go.

2 Q Well, that's not the way I prefer to go.

3 A Okay.

4 Q Are you aware of any changes that have been made
5 to LENS since June 17th that would not be self evident to a
6 user of the system?

7 A I can't think of one off the top of my head.

8 Q Is the answer you don't know?

9 A Yes.

10 Q Thank you. What is CGI?

11 A CGI is an acronym for a common gateway interface.

12 Q And is there -- well, what is a common gateway
13 interface?

14 A A common gateway interface is a method or a
15 program, if you will, for taking the output of one
16 application and making it available for use in another
17 application. It's a program for manipulating data from one
18 system to another.

19 Q And has there been a CGI -- I'm going to call it
20 system; I don't know if system is the right word --
21 developed for use in conjunction with LENS?

22 A No, it's something that BellSouth had proposed
23 and stood willing to make available, and we had discussions
24 with a number of parties about it, but to my knowledge
25 there is no one currently pursuing that option with us.

1 Q Did BellSouth at one point commence the
2 development of a CGI system for use with LENS?

3 A BellSouth began the development of a CGI
4 technical specification, but that's something different
5 than building a system. The actual CGI program would be
6 done on the -- or I guess I should say a portion of the
7 programming would be done on the CLEC side of the interface
8 as well.

9 Q Would a portion of the programming be done on
10 BellSouth's side of the interface?

11 A Yes.

12 Q BellSouth -- Let me try and understand.
13 BellSouth began the development of a technical
14 specification for a CGI interface but at some point
15 abandoned that effort; is that correct?

16 A Yes, the effort was abandoned when it appeared
17 that there was not going to be a party pursuing that option
18 with us.

19 Q Now I believe you have testified that a user of
20 LENS might choose to integrate some of the pre-ordering
21 information from LENS with its own EDI system to avoid its
22 customer representative having to move from one system to
23 another; is that correct?

24 A Yes.

25 Q Would that be a CGI application?

1 A Yes.

2 Q At this point is it fair to say that BellSouth
3 has not completed the specifications for using CGI in
4 conjunction with LENS and has done no development of an
5 actual CGI -- the portion of the CGI that needs to be done
6 on BellSouth's side of the interface?

7 A While I would agree that it's true that BellSouth
8 does not have a completed specification, and it's also true
9 that we haven't done any of the development work, with the
10 specification that we have, there is a, more than a good
11 starting point of what needs to be done. The existing
12 specification would have to be updated as it is now a few
13 months out of date.

14 Q So whenever you say that an ALEC could design a
15 front-end system to integrate LENS and EDI, a prerequisite
16 to that is for BellSouth to complete the CGI specification
17 and for BellSouth to complete some CGI work on its side of
18 the interface; is that correct?

19 A No, I don't agree that it's a prerequisite.
20 There is enough information available as a starting point
21 that the work could proceed in parallel.

22 Q The work of a CLEC to turn up for commercial use
23 a system that -- a front-end system that integrates LENS
24 and EDI cannot be completed without further work by
25 BellSouth; is that correct?

1 A That's correct.

2 Q One final series of questions. Ms. Calhoun, you
3 talked earlier about the technical capability to submit an
4 order for more than one unbundled network element in a
5 single EDI transaction. Do you remember that conversation?

6 A Yes.

7 Q And I believe that you deferred any policy
8 questions about whether an ALEC would be allowed to combine
9 two elements to other witnesses. Am I remembering that
10 correctly?

11 A The whole question about combinations and who
12 does the combinations, yes, I believe are legal and policy
13 questions.

14 Q Okay. I want to ask you a technical question
15 about the capability of the interface and the downstream
16 systems. Assume that BellSouth were required to honor a
17 request for a loop/port combination in a situation where
18 that loop and port are combined today in BellSouth's
19 network to serve the same end user the ALEC wants to
20 serve. Are you with me on the assumption?

21 A Are you talking about an existing service that --
22 Better try me again.

23 Q Okay. Assume I am a BellSouth customer. I'm
24 served by -- The services provided to me makes use of a
25 loop and a port, correct?

1 A Yes.

2 Q And that loop and port are connected to each
3 other today, correct?

4 A Yes.

5 Q Assume that an ALEC desires to serve me by
6 ordering a loop/port combination and they say we want that
7 loop that is serving Mr. Melson today, and we want that
8 port that is serving Mr. Melson today, and we want them
9 combined, and because they are combined today, we don't
10 want them taken apart, we just want them the way they are
11 today; do you understand that assumption?

12 A Yes.

13 Q Okay. Assuming that a policy decision has been
14 made that BellSouth must honor that request, I'm asking you
15 hypothetically to make that policy assumption so we don't
16 get into the policy question. Is BellSouth's ordering
17 system capable of accepting and generating an order for
18 that work that would enable those elements to be
19 provisioned to the ALEC in the manner I've just described?

20 A I don't know. I don't know whether a full
21 evaluation of that has been made. I believe that what I
22 testified earlier was that from a technical perspective the
23 system can be made to do whatever is appropriate from a
24 legal and policy perspective; but the situation you
25 described, as with any other product development effort,

1 the folks who are intimately involved with the details of
2 each system would need to evaluate what particular impact
3 that type of request would have on their systems.

4 Q Thank you, Ms. Calhoun.

5 MR. MELSON: That's all I've got.

6 CROSS EXAMINATION

7 BY MR. WILLINGHAM:

8 Q Ms. Calhoun, my name is Bill Willingham. I am
9 here on behalf of TCG, Teleport. I have just a few
10 questions for you. I believe that you testified earlier
11 that the LENS system will be modified in the future. Will
12 BellSouth be responsible for implement --

13 A I'm sorry, I'm having trouble hearing you.

14 Q Okay. I believe you testified earlier that the
15 LENS system will be modified in the future; is that
16 correct?

17 A Yes.

18 Q And is it correct that BellSouth will be
19 responsible for implementing these modifications?

20 A Yes.

21 Q Okay. And will BellSouth be responsible for
22 maintaining the LENS system as time marches on?

23 A Yes.

24 Q Okay. When a BellSouth service representative
25 enters an order in the systems that BellSouth uses, RNS or

1 DOE, how does the representative determine whether that
2 customer account will be subject to a municipal tax?

3 A Again, I'm hearing, it seems like, every other
4 word. You are kind of cutting in and out.

5 Q Okay. When a BellSouth service representative
6 enters an order into the systems that BellSouth uses, which
7 I believe are RNS and DOE, how does the representative
8 determine whether or not that customer account will be
9 subject to a municipal tax?

10 A I don't know.

11 Q Okay.

12 COMMISSIONER GARCIA: Your question was how a
13 BellSouth employee would --

14 MR. WILLINGHAM: Yes, that's correct.

15 COMMISSIONER GARCIA: Okay.

16 BY MR. WILLINGHAM:

17 Q If you could turn, please, to page 21 of your
18 direct testimony, line 12.

19 MR. ELLENBERG: I'm sorry, I missed the
20 reference. Could you give it to us again, please?

21 MR. WILLINGHAM: It's page 21, line 12.

22 Q There is a sentence that begins with "A chart
23 showing that."

24 A Yes.

25 Q If you could read that quickly please into the

1 record.

2 A "A chart showing that LENS and RNS access
3 BellSouth's pre-ordering data bases in substantially the
4 same time and manner as provided as Exhibit GC-2."

5 Q Thank you. And if you could, turn to Exhibit
6 GC-2. Could you point to me --

7 A Wait, please, I'm not there yet.

8 Q Oh, I'm sorry. Have you found it?

9 A Yes.

10 Q Okay. Could you show me where on this exhibit
11 the data exists that supports your statement that the
12 access times are, quote, substantially the same, end of
13 quote?

14 A Well, first, I don't think my statement was that
15 the access times are the same. What I was talking about
16 was not in the sense of performance measurements whether
17 something is two tenths of a second or two seconds or that
18 sort of thing. When I say in substantially the same time
19 and manner, what I'm saying is that both systems have real
20 time interactive access to the same data bases so that when
21 a BellSouth customer is on the phone with a BellSouth
22 service representative or an ALEC customer is on the phone
23 with an ALEC service representative that they both are able
24 to get to information in the same data bases during the
25 course of that customer contact.

1 Q Okay. So it's not your testimony that it
2 would -- essentially if you hooked both systems up at the
3 same time on competing computers that you would get to them
4 at exactly the same time?

5 A You mean in terms of measuring the seconds or the
6 time involved?

7 Q Correct.

8 A No, I think that that's a better question for
9 Mr. Stacy.

10 Q Okay. Do LENS, EDI, RNS and DOE utilize the same
11 data base?

12 A Are you talking pre-ordering data bases?

13 Q Yes.

14 A EDI is an ordering interface. It's not a
15 pre-ordering interface, so it has no relationship to these
16 data bases. LENS, RNS and DOE all access these data bases.

17 Q Okay. Thank you. And I have one last question.
18 This morning when Mr. Melson was questioning you, we went
19 through the, I believe it was the EDI system, and we tried
20 to -- or I think he asked you a question regarding how you
21 would pick a new phone number if you're in EDI. Is it
22 possible to actually determine the phone number while you
23 are in the EDI system?

24 A No, the EDI interface is an ordering interface,
25 and selecting a telephone number is a pre-ordering

1 function. You can run LENS simultaneously with EDI and
2 select your telephone number in LENS and use that in your
3 EDI order.

4 Q Okay. But it's correct to say that LENS and EDI
5 are two separate and distinct programs, right?

6 A Yes.

7 Q Okay.

8 MR. WILLINGHAM: I have no further questions.

9 CROSS EXAMINATION

10 BY MS. RULE:

11 Q Ms. Calhoun, I'm Marsha Rule, and I have one
12 question that will require a demonstration, so give you a
13 minute to get LENS up.

14 A Okay.

15 Q And in the meantime, I would like you, please, to
16 turn in your deposition to page 254, and you should have
17 that as Staff's Exhibit Number 43. I can give you my copy
18 if you need it.

19 A I have the deposition. The Staff Exhibit 43 is
20 what threw me.

21 Q I'm sending it over to you.

22 A Okay.

23 Q On the copy I sent over to you there is a tabbed
24 page. Do you see that?

25 A Yes.

1 Q And beginning on page 254, I have highlighted
2 some information. Could you take a moment and read that,
3 please?

4 (Witness complied)

5 A Yes.

6 Q Now please correct me if I'm wrong, but this is
7 in response to some questioning by Mr. Melson, and you have
8 my copy so I can't read it; but I believe it says that if
9 you click on a telephone number that you want to keep while
10 you are in the LENS inquiry mode that you've reserved the
11 telephone number. Mr. Melson then asked you what would
12 happen if you went into the firm order mode and chose or
13 input that number, and you responded that LENS would show
14 you the numbers you'd previously reserved and you could
15 just select the number and say it's the one you want to use
16 if you are placing the order through LENS, and I would like
17 for you to demonstrate that, please.

18 A Oh, okay. Well, we'll need to go to the inquiry
19 mode.

20 Q So you click on the inquiry button?

21 A Yes. We'll select reserving a telephone number.

22 Q From the inquiry menu?

23 A Yes. We could put in -- let's put in my home
24 telephone number, 404-355-1568. We'll assume that I want
25 to reserve a telephone number, I want to add a second line

1 to my home. The system will give me options for my
2 particular central office. Let's select a random telephone
3 number. The system gives me a list of numbers from which I
4 can choose. I'll take the first one, which is
5 404-352-0687. I'm keeping that telephone number. Okay,
6 now we can go to the firm order mode, begin placing the
7 order, indicate the activity type, service type. We can
8 put in my telephone number.

9 Q Okay. Now you are typing in a number again?

10 A Yes.

11 Q And I understood that there would be an automatic
12 pop up of this from your testimony in your deposition.

13 A When we get to the telephone number reserve
14 screen. The telephone number selection screen is different
15 in the firm order mode in that it will show us numbers that
16 were previously reserved.

17 Q All right.

18 A I'm just proceeding through the order to the
19 telephone number selection portion of the order, and I
20 simply put in my telephone number to validate the address.
21 The address can be validated either way.

22 All right, at this point --

23 Q I don't see any previously reserved telephone
24 numbers. Is that where it would appear on the screen?

25 A Yes, I think so. Let me think about this. It's

1 possible that I misspoke during my deposition that, in
2 fact, this gives you the option of entering a previously
3 reserved telephone number.

4 Q Which would be a manual process and not the
5 electronic process you described?

6 A Right. Well, his -- no, his question to me, and
7 I admit that I didn't answer it very well here, what if you
8 then go into the firm order mode and again choose that
9 number or input that number, and I guess that's why I
10 misspoke. You can input that number here.

11 Q But your response was that LENS would show you
12 numbers you have previously reserved, and that's what I
13 don't see happening.

14 A Right, and that's the part where I'm saying I
15 misspoke. In answer to the part of his question that you
16 can input that number, you can input it at this point. In
17 terms of it appearing to you on the screen, it does not
18 happen.

19 Q I'm not sure I understand that, so please help me
20 out here. Again, you've got the testimony in front of you
21 and I don't.

22 A Okay.

23 Q In order to correct that --

24 A Would you like me to correct the answer here?
25 Would that help?

1 Q Just a moment, let me pull up the language.

2 A Okay.

3 Q And you have my highlighted version, so if you
4 could please tell me the line number.

5 A Line 9. Lines 6 through 12.

6 Q Thank you. And unless I miss my guess, you would
7 have to delete lines 9, 10 and 11, and instead of showing
8 you the numbers, you would have to say that you will then
9 input the number again; is that correct?

10 A I would delete line 9 and the first part of line
11 10, and I would start the answer with, You can just input
12 the number at that time and say it's the one you want to
13 use if you are placing an order through LENS.

14 Q And that would be a manual process, correct?

15 A Yes.

16 MS. RULE: Commissioners and Ms. Calhoun, please
17 forgive me if I jump around a little bit. In his usual
18 thorough fashion, Mr. Melson has asked a good many of the
19 questions I would have liked to. I will not need further
20 LENS demonstration, however.

21 COMMISSIONER GARCIA: While Ms. Rule looks
22 around, why is it that those previously selected numbers
23 don't pop up there? I mean it doesn't seem like something
24 that difficult to program into it?

25 WITNESS CALHOUN: I don't know. You know, as you

1 can tell from the deposition, it was my recollection that
2 they did; but obviously the system is not doing that. You
3 know, I think it could be programmed, and I think that the
4 distinction is being made there that if you have a number
5 that you've already reserved you can just put it there as
6 opposed to going through the number search.

7 COMMISSIONER DEASON: How long is the number
8 reserved?

9 WITNESS CALHOUN: A number is reserved for, let's
10 see, in Florida I believe it's 60 days. In some states
11 it's 90 days.

12 COMMISSIONER DEASON: And you can reserve as many
13 as six per inquiry?

14 WITNESS CALHOUN: Well, there is kind of more to
15 it than that. The rules are different depending on whether
16 you are reserving a telephone number that you are just
17 reserving for future use, that you have no imminent service
18 order for, and so there is that reservation process. If
19 numbers are selected for use, then they are held for a
20 period of up to seven days looking for a service order,
21 just waiting for a pending service order to come through.

22 COMMISSIONER DEASON: So if someone using LENS
23 makes an inquiry and they select six numbers just to hold,
24 you'll hold them for seven days?

25 WITNESS CALHOUN: No, we'll actually hold them

1 for up to 90 days if they're holding them --

2 COMMISSIONER DEASON: Now I'm confused. You have
3 given me seven days, 90 days, 60 days.

4 WITNESS CALHOUN: I'm sorry, in most states it's
5 90 days; in Florida it's 60 days. Shall I back up and try
6 again?

7 Okay. There are two different statuses for
8 telephone numbers that the data base recognizes. One of
9 those is numbers that are just being held for future use
10 without a service order or an imminent service order
11 associated with them.

12 COMMISSIONER DEASON: And those numbers will not
13 come up as available when an inquiry is made; is that
14 correct?

15 WITNESS CALHOUN: The way that you can reserve
16 those numbers for that status is through the inquiry mode,
17 and those will be held for 60 days in Florida; and so those
18 are numbers that are just being held for some future use.
19 And then there are numbers that are associated with an
20 imminent service order, and those are held for a period of
21 seven days. And it's just in one mode in LENS it's a
22 reservation process. In another mode in LENS it's a
23 selection process or kind of a temporary hold period with
24 the expectation that a service order is coming through. In
25 both cases they are removed from the pool of available

1 numbers.

2 But your question about the six numbers, ten
3 numbers come up at a time, and we say that in any single
4 transaction you can reserve six of those or select six of
5 those. If you want more than that, you just do it again
6 and take another six.

7 BY MS. RULE:

8 Q To follow up on a couple of Commissioner Deason's
9 questions, are BellSouth representatives limited to six
10 reserved numbers at one time?

11 A No, but again, there is even more to it than
12 that. The ALEC is not limited to six reserved telephone
13 numbers at any one time. They actually can reserve up to a
14 hundred per central office at any one time, and those are
15 the ones that are just for future use, no imminent service
16 orders. For the ones that are done in the selected status,
17 which is the temporary hold period with a service order
18 coming through, there is no limit on those.

19 COMMISSIONER DEASON: Let me ask a question. If
20 an ALEC chooses to reserve a hundred numbers, can they just
21 enter one of those hundred numbers in and not even have to
22 go through this random selection process or find out what
23 is available?

24 WITNESS CALHOUN: Yes.

25 COMMISSIONER DEASON: They just talk to their

1 potential client and say, you know, here is a number and
2 then the client says that's fine, they enter the number and
3 they just go on about their business?

4 WITNESS CALHOUN: Yes.

5 BY MS. RULE:

6 Q Ms. Calhoun, I'm still confused here. Are the
7 six numbers that may be reserved through LENS, are those
8 reserved in the sense you were saying?

9 A Yes.

10 Q And how long will those numbers be reserved?

11 A They will be reserved for 60 days.

12 Q Will you accept subject to check that the LENS
13 users' guide states that only six numbers may be reserved
14 per order and that they are reserved for nine calendar
15 days?

16 A Can you point me to a place in the --

17 Q Page 18 of the June 17th, 1997 user guide.

18 A When it says currently only six numbers may be
19 reserved per order, the term order here is a little out of
20 place because we are in the inquiry mode here, and we are
21 reserving telephone numbers independently of a service
22 order; so I interpret this to mean currently six numbers
23 may be reserved at a time. When you pull up ten, you can
24 keep six of those. If you wanted to reserve six more for
25 that office, you would repeat that process.

1 The numbers being reserved for nine calendar
2 days, you know, I don't know whether this is a typo. It
3 does not -- it's not consistent with my information. I'd
4 be happy to provide a late-filed exhibit if that would be
5 helpful.

6 Q No thank you. And when you earlier stated that
7 you could as an ALEC reserve up to one hundred numbers in a
8 central office, if you chose to do it through the inquiry
9 mode, you could only do it six numbers at a time; is that
10 it?

11 A Yes, there are two different processes we have
12 available for that. Prior to the availability of LENS, we
13 implemented an electronic file transfer process with AT&T
14 to give them batches of a hundred numbers per central
15 office at a time, and that process is still available to
16 them; but if a CLEC chose to do that through LENS, they
17 would do it six numbers at a time.

18 Q If I'm an ALEC service representative sitting in
19 front of the LENS screen, using it in the inquiry mode,
20 which I believe is what you're relying on for 271
21 compliance for pre-ordering; is that correct?

22 A Yes.

23 Q Then if a customer calls me and wants to place an
24 order for 12 lines, I can't do it in one session, can I?

25 A Well, actually in that case you could, and I

1 apologize because telephone number assignment reservation
2 gets kind of complicated. But if you had a customer who
3 wanted 12 lines, typically what we would assign is what is
4 called a multi-line hunt group, which means that in order
5 to conserve telephone numbers you'd actually assign -- you
6 would only assign an actual ten-digit telephone number to
7 the first number in that group; and then you would use
8 something called terminal numbers behind that. Anytime you
9 get over five lines, the telephone number assignment
10 practices change in a way that let's us conserve telephone
11 numbers.

12 Q Okay. Well, I'm trying to stay under those 12
13 lines, and I don't want to order multi-line hunt. Let's
14 say I want to order eight lines. I'll have to go into this
15 screen and do it several times, won't I? I can get the
16 numbers, I just can't get them from one screen?

17 A Right, if you wanted eight separate telephone
18 numbers and you wanted to get them both, you would have to
19 do it -- no, you wouldn't have to do it several times. You
20 would have to do it twice.

21 Q And that's not a restriction on a BellSouth
22 service representative taking that same order, is it?

23 A A customer service representative in DOE has to
24 go get multi-line hunt groups assigned if they get over
25 five or six lines, depending on the state.

1 Q I don't believe that answered my question.
2 Assuming that the BellSouth representative was placing the
3 same order, they could indeed order eight different lines
4 at the same time unrestricted by DOE; is that correct?

5 A And what I'm trying to say is that I don't
6 believe that DOE will let them get eight lines. If they
7 get over a certain line size, they have to go to a
8 different numbering scheme.

9 Q What is that line size?

10 A It's five or six, depending on the state.

11 Q Let's assume I have a very large house and I want
12 to go in through RNS. May I reserve those eight numbers?

13 A I believe you can in RNS, yes.

14 Q Thank you. Just a moment. And I apologize if
15 some of this is repetitious, but I'm not sure that you told
16 the Commission the systems you were relying upon for 271
17 compliance for ordering unbundled network elements. I
18 believe you mentioned that you were relying upon EDI for
19 ordering the NID; is that correct?

20 A Yes.

21 Q And what system or interface would you be relying
22 on to order the loop?

23 A EDI.

24 Q Local switching?

25 A EDI.

1 Q Operator systems?

2 A And I have to qualify my answer. I understand
3 local switching to be an unbundled port.

4 Q And that would be EDI?

5 A Yes.

6 Q Operator systems?

7 A Those are ordered via EXACT.

8 Q Dedicated transport?

9 A That can be ordered via EDI.

10 Q Common transport?

11 A EXACT.

12 Q Tandem switching?

13 A EXACT.

14 Q Signaling link transport?

15 A I believe it's EXACT, but I'm not a hundred
16 percent sure about that.

17 Q Signal transfer points?

18 A Again, we are getting into some services that I
19 think Mr. Milner was probably in a better position to
20 describe the details of.

21 Q Now I believe in your Late-filed Deposition
22 Exhibit Number 16 you testified that no ALECs have ordered
23 any UNES in any BellSouth state using these systems; is
24 that correct?

25 A I'm trying to find that.

1 (Witness reviewed document)

2 A Yes.

3 Q And I believe the --

4 A Well, excuse me, I'm not sure.

5 Q Well, if you would like to read the question and
6 answer.

7 A Yeah, I just wanted to make sure that it applied
8 to the BellSouth region, and it does.

9 Q And I believe the -- well, could you tell the
10 Commission what UNEs can currently be ordered via EDI?

11 A Yes. The NID, unbundled loop, unbundled port,
12 interim number portability and unbundled interoffice
13 transport.

14 Q And in addition, you may order SynchroNet and
15 ISDN basic through EDI; is that correct?

16 A And 32 other services.

17 Q So SynchroNet and the ISDN basic would fall in
18 the complex service category?

19 A Yes.

20 Q And the others would not fall in that category?

21 A No, two of the others are complex services as
22 well.

23 Q Could you name them?

24 A PBX trunks and multi-line hunt.

25 Q Thank you. Now is that EDI PC or mainframe EDI

1 that you can order these through?

2 A Both.

3 Q When you say both -- Who uses mainframe EDI?

4 A I'm going to have to say that mainframe EDI is a
5 term that I've not really heard used until I heard you use
6 it in my deposition, so if you would clarify for me exactly
7 what you mean by mainframe EDI.

8 Q That could be an AT&T term. Is AT&T the only
9 ALEC using the, using a form of EDI that is not the PC EDI?

10 A As far as I know.

11 Q And in order for AT&T's system to talk to
12 BellSouth's system, they have to be able to talk to each
13 other I believe is what you said earlier, right?

14 A Well, they have to exchange information in
15 predefined formats.

16 Q And in order for AT&T to build its system to
17 match BellSouth's, those specifications have to be
18 available to AT&T on a regular and timely basis, do they
19 not?

20 A Yes, many of those actually have been jointly
21 developed with AT&T.

22 Q We're going to hand out a copy of Attachment 15
23 to the AT&T/BellSouth interconnection agreement and a
24 letter dated August 22nd, 1997 with an AT&T letterhead
25 addressed to the executive secretary of the Georgia Public

1 Service Commission. And I believe the next exhibit number
2 would be 49. I would like to identify this as Exhibit 49,
3 a composite exhibit.

4 CHAIRMAN JOHNSON: It will be identified as 49.
5 What's a short title?

6 MS. RULE: August 22nd letter to Georgia PSC and
7 Attachment 15.

8 BY MS. RULE:

9 Q Now Ms. Calhoun, what is BellSouth's agreement
10 with AT&T for a pre-ordering interface?

11 A Well, there are a number of different
12 pre-ordering -- aspects of pre-ordering addressed in
13 Attachment 15.

14 Q What would the long-term agreement be?

15 A The long-term agreement is that BellSouth will
16 implement a customized interface for pre-ordering designed
17 to AT&T's specifications.

18 Q And is that called EC-lite?

19 A Yes.

20 Q And I believe that is found in Paragraph 7.1.2 on
21 page 9 of Attachment 15, and so as far as you know, is that
22 the agreement between AT&T and BellSouth regarding EC-lite?

23 A While I have to say I'm not a lawyer, but in
24 terms of whether it represents the full agreement, I think
25 not. There is a joint implementation agreement that is

1 being developed that fleshes out the details of this
2 interface.

3 Q Will EC-lite be available to use for switch
4 feature availability?

5 A Yes.

6 Q How about for address verification?

7 A Yes.

8 Q Telephone number assignment?

9 A Yes.

10 Q Appointment scheduling?

11 A Yes.

12 Q And customer service record availability?

13 A Yes.

14 Q When will those functions be ready?

15 A The implementation date is December of this year.

16 Q And is that December 31st, 1997?

17 A I'll accept that subject to check.

18 Q Thank you. BellSouth and AT&T have agreed on the
19 specifications for EC-lite; is that correct?

20 A I'm not sure whether those have been fully agreed
21 upon, but it's my understanding those continue to evolve in
22 the course of discussions. I think that there is agreement
23 on a substantial portion of them.

24 Q Would some of that agreement be found in
25 Paragraphs 7.1.2 and 7.1.3?

1 A Again, if you're asking me, you know, from a
2 legal perspective whether this represents the agreement, I
3 think there is a tremendous amount of documentation on the
4 interfaces that is not reflected here.

5 Q Well, I'm not asking for a legal opinion on the
6 extent of BellSouth's obligations under the interconnection
7 agreement, but would you agree that this appears to
8 represent the agreement you were talking about earlier to
9 develop an interface to AT&T's specifications?

10 A Yes.

11 Q Will you turn to page 3 of Attachment 15?

12 A Yes.

13 Q In Paragraph 4.6.

14 A Oh, I'm sorry, I'm looking at the wrong thing.

15 Q Attachment 15, page 3.

16 A Yes.

17 Q And I believe the last sentence in that paragraph
18 is where we get the December 31st, 1997 interface
19 availability date; is that correct?

20 A I'll have to read the paragraph. This
21 attachment, as I recall, was discussing a number of
22 interfaces.

23 (Witness reviews document)

24 A Yes, it appears to be.

25 Q Now in Paragraph 4.6, the second sentence states,

1 "For purposes of this attachment, electronic communication
2 interface defines a machine-to-machine or
3 application-to-application interface and excludes an
4 interface that provides a presentation for manual entry."
5 Now that definition would exclude LENS, would it not?

6 A Yes.

7 Q And I'd like to refer you to the August 22nd
8 letter to the Georgia Public Service Commission. Have you
9 seen this before?

10 A Yes.

11 Q Does it explain some differences between
12 BellSouth and AT&T with regard to the implementation of the
13 operational interface between the parties?

14 A I wouldn't say it explains the differences. I
15 would say that it presents AT&T's point of view.

16 Q Shall we say it sets forth some differences
17 instead?

18 A All right.

19 Q I would like you to turn to page 3 of the
20 letter.

21 (Witness complied)

22 MR. ELLENBERG: I'm sorry, I only have two pages.

23 MS. RULE: I'm sorry, that would be page 3 of the
24 attachment.

25 BY MS. RULE:

1 Q Paragraph 2.1 discusses some problems AT&T has
2 experienced with limited or no access to the RSAG data
3 base. If AT&T does not have access to the RSAG data base,
4 what functions of the ordering and pre-ordering process
5 would that impair?

6 A RSAG access relates to address validation.

7 Q Without address validation, you might have the
8 problems Mr. Melson asked you about when you input an
9 address without an electronic validation through
10 BellSouth's systems; is that correct?

11 A Yes.

12 Q And are you aware that AT&T is still experiencing
13 RSAG problems?

14 A I'm aware -- No, I'm not aware that they are
15 still experiencing problems. I know that there have been
16 some problems recently, and this I would point out is not
17 accessing RSAG through LENS, an address validation through
18 lens as was described earlier. This is a separate
19 interface that AT&T had requested, and there have been some
20 problems that have surfaced on the part of both BellSouth
21 and AT&T, and my understanding is that both parties have
22 worked to correct those.

23 COMMISSIONER CLARK: Ms. Calhoun, let me ask you,
24 is this surveillance report -- or is this system for
25 throughout the BellSouth territory, or is it just Georgia,

1 the report and the system?

2 WITNESS CALHOUN: Well, the report is just for
3 Georgia. The systems are available for nine states.
4 Specifically in the context of a resale docket that was
5 heard in Georgia in March of 1996, the orders that came out
6 of that required BellSouth to make available certain
7 interfaces that predated the interconnection agreements,
8 and then also there were some determinations there made
9 about the interfaces under the interconnection agreements,
10 and this is reporting on both of those.

11 COMMISSIONER CLARK: Well, let me just ask you,
12 the attachment is entitled "AT&T's Monthly Surveillance
13 Report, Operational Support Systems," and it has a date of
14 August 22nd, 1997. Does this surveillance report relate to
15 activity in Florida?

16 WITNESS CALHOUN: The surveillance report is
17 Georgia specific, as I understand it. In connection with
18 the resale docket, the Georgia commission instituted the --

19 COMMISSIONER CLARK: Surveillance.

20 WITNESS CALHOUN: -- monthly surveillance, and
21 the activity associated with that was complete, but then
22 there were new issues that were arising in connection with
23 the interconnection agreements; and so that monthly process
24 has just kind of evolved to cover a different set of
25 circumstances, but the interfaces themselves that we are

1 developing have region-wide application.

2 COMMISSIONER CLARK: Thank you.

3 BY MS. RULE:

4 Q Commissioner Johnson asked you a question about
5 whether the status report relates to Florida activity. How
6 does AT&T access the RSAG data base?

7 A On a local-area-network to local-area-network
8 connection.

9 Q And is that through Charlotte?

10 A I'm not sure exactly which data center is
11 involved, but I think --

12 COMMISSIONER CLARK: Is Charlotte a city, or is
13 it another acronym?

14 WITNESS CALHOUN: Charlotte is a city in North
15 Carolina where BellSouth has a data center. But, you know,
16 just to clarify, the interfaces that BellSouth has agreed
17 to with AT&T are region-wide interfaces.

18 Q So in other words, if it doesn't work in Georgia
19 and you can't access it through Charlotte, North Carolina,
20 then it's indicative of a problem with the system that
21 would not be specific to just Georgia or just Florida; is
22 that correct?

23 A Assuming that there is such a problem, yes.

24 Q And the way that you mentioned AT&T accessed it,
25 is that through another acronym, IC/REF?

1 A Yes.

2 Q Now that's used by IXEs, isn't it?

3 A Yes, that's where it's original name came from.
4 IC/REF stands for interexchange carrier reference, I
5 believe.

6 Q So IXEs trying to get into RSAG experience the
7 same problems, would they not?

8 A Well, I'm not sure that we've really established
9 that there is a problem. I think what I said was that
10 BellSouth and AT&T both experienced some difficulties
11 associated with the RSAG interface; and to my knowledge,
12 both parties have worked to correct those. And as I said
13 earlier, I'm not aware that there still exists a current
14 problem.

15 Q Well, I believe you also stated that AT&T was
16 unusual in the way it was trying to access that, but I
17 believe AT&T is trying to access that data base through
18 IC/REF, just as IXEs do, so this is not a problem unique to
19 AT&T's system, is it?

20 A I don't think I -- I don't recall saying that
21 AT&T was unusual in the way they were trying to access
22 this. And as I understand it, yes, the problems were
23 unique to the system with AT&T. There were some specific
24 issues related to the software that AT&T was using for
25 security purposes, and there were some specific issues

1 related to how passwords were being used. They were having
2 a number of users, many different users using a single
3 password to log on rather than obtaining separate passwords
4 for the various users. That appeared to our security
5 software to be a problem. If you see multiple users
6 logging on with a single password, it's an indication that
7 you may have a security breach, and the system will want to
8 deny access. So I would say while it's a system that is
9 available to other carriers as well, there were some AT&T
10 specific issues. But again, to my knowledge, both parties
11 have worked to correct the problems that were identified.

12 Q The date of this letter is August 22nd, and on
13 page 3 of the attachment it states that, "AT&T is still
14 experiencing serious problems accessing RSAG and is only
15 able to use it in a limited capacity." Is that still
16 correct, or do you know?

17 A To my knowledge, AT&T has acquired additional
18 passwords, and it's possible that limited capacity refers
19 to that. But I guess what I would say is that I'll go back
20 to my earlier statement to say that this sets out AT&T's
21 side of what has occurred, and I'll be happy to provide a
22 full BellSouth explanation or our view of what has
23 transpired with each of these.

24 Q Well, as a matter of fact, this was supposed to
25 be a joint status report, was it not?

1 A I don't know.

2 Q If you look on page 2 of the attachment, the
3 bottom half of the page, I believe it recites a process
4 agreed upon between BellSouth and AT&T to file joint
5 reports but states that BellSouth did not meet its
6 commitment to provide a draft to AT&T, no July report was
7 filed; and at the very bottom of the page, BellSouth
8 notified AT&T that it would not provide status to the
9 Commission on ordering and billing processes. Has
10 BellSouth provided a status report that is an analog to
11 this one on ordering and billing processes?

12 A I'm sorry, I was trying to read what was here at
13 the same time I was trying to hear what you were saying,
14 so --

15 Q Why don't we start over.

16 A Your initial question, as I understand it, was,
17 was this supposed to have been a joint report? I'm not
18 aware of any commission requirement in Georgia that we were
19 to file a joint report. And if you'll give me an
20 opportunity to read this, you know, I might be able to
21 comment further.

22 Q Do you have the page reference?

23 A Page 2?

24 Q Yes.

25 A Yes. Well, at the top of page 3 it says that

1 AT&T decided to file independent reports.

2 Q Could you read the last sentence on the bottom of
3 page 2, please?

4 A "Due to BellSouth's decision to only provide a
5 partial status, AT&T decided to file independent reports on
6 the status of the implementation of all its operational
7 interfaces beginning in August, 1997."

8 Q I'm sorry, Ms. Calhoun, could you read the last
9 complete sentence on page 2?

10 A "On August 8th, 1997, BellSouth notified AT&T
11 that BellSouth would not provide status to the Commission
12 on the ordering and billing processes."

13 Q And then you continue with the sentence, "Due to
14 BellSouth's decision?"

15 A Right.

16 Q And the one you just read.

17 A Again, this is an AT&T report. I can't fully
18 respond on what BellSouth's view of what a joint report to
19 the Georgia Commission should or should not have been.

20 Q You received a copy of this report in the
21 Kentucky hearing, did you not?

22 A I did.

23 Q Going on to page 4 of the attachment, the page
24 deals with the LENS system?

25 A Yes.

1 Q At the bottom of the page there is a little box
2 that talks about milestone, date required, date
3 accomplished and status. Are those dates that were agreed
4 upon between -- I'm sorry, are the dates in the required
5 field dates that were agreed upon between BellSouth and
6 AT&T?

7 A I don't know what the basis for the 6/25 date is.

8 Q The field milestone lists, I guess, two goals.
9 One is training. It appears that the date required was the
10 date accomplished, and the status of that is completed.
11 What is the next item?

12 A D-e-v, which I assume means develop, work center
13 operational agreement.

14 Q And what was the date required?

15 A 6/25/97.

16 Q What is the date that was accomplished?

17 A There is not one shown.

18 Q What is the status according to the AT&T status
19 report?

20 MR. ELLENBERG: Chairman Johnson, I object. If
21 she is simply asking her to read from the document as to
22 what it says there, I guess that's one thing. I'm not sure
23 it's a productive use of our time. She has testified she
24 didn't know what those dates are, where they came from, so
25 she can't testify if they are accurate or not. Again, the

1 witness has said this is simply an AT&T perspective on
2 certain items.

3 MS. RULE: Well, I do have some questions I would
4 like to ask her, and I would like her to read the material
5 first.

6 Q And the specific question I would like to ask
7 about this is, has BellSouth completed documentation of the
8 manual processes as listed or as required by the parties'
9 agreement?

10 A I am not aware of what manual procedures this is
11 referring to. I'm not aware of what work center
12 operational agreement this is referring to, nor what the
13 basis for this date is. The LENS system is available. It
14 doesn't require manual procedures. I mean I'm just not
15 sure what this is referring to. I'm not aware that this
16 has been an issue.

17 Q Then I'll move on.

18 COMMISSIONER CLARK: Ms. Calhoun, just so I'm
19 clear, when did you testify in Kentucky?

20 WITNESS CALHOUN: Last week.

21 COMMISSIONER CLARK: And you were presented this
22 document last week?

23 WITNESS CALHOUN: I was.

24 COMMISSIONER CLARK: And you didn't have time to
25 investigate it and get BellSouth's side of the story? I

1 appreciate you may have been busy, I understand that.

2 WITNESS CALHOUN: I really have not.

3 COMMISSIONER CLARK: Okay.

4 WITNESS CALHOUN: It's my understanding that
5 BellSouth agreed in Kentucky that it would provide a
6 response to this.

7 COMMISSIONER CLARK: Okay.

8 WITNESS CALHOUN: And so knowing that that was in
9 progress --

10 COMMISSIONER CLARK: So you didn't worry about
11 it.

12 WITNESS CALHOUN: -- I haven't tried to do any
13 independent evaluation.

14 COMMISSIONER CLARK: All right.

15 BY MS. RULE:

16 Q Over on page 5 of the attachment, there is a
17 discussion of the pre-order gateway, and under the section
18 entitled general information and at the very bottom of the
19 page there is an indication that BellSouth has stated it
20 will not comply with some mutually agreed upon
21 specifications, and there are three of them listed. Do you
22 know what the status of those mutually agreed upon
23 specifications is this week?

24 A Yes. This is one I did check on, because it
25 just -- it sounded so foreign to what my understanding of

1 the situation was, and I consulted with the project manager
2 for BellSouth who has the responsibility for implementing
3 the pre-order gateway; and I am not certain why AT&T is
4 saying that these specifications were mutually agreed
5 upon. It has been BellSouth's position and continues to be
6 BellSouth's position that we don't have the capability to
7 do these particular things and that we never agreed to
8 doing them.

9 Q Well, I believe -- strike that.

10 If that's the case, then is the pre-ordering
11 gateway that BellSouth intends to deliver on 12/31/97 a
12 negotiated gateway or one the specifications of which were
13 imposed by BellSouth?

14 A In any implementation of this nature, there are
15 negotiations that take place back and forth, and there are
16 always some limitations that may be imposed by one party's
17 system or another. I don't think that -- this is not a
18 matter of BellSouth imposing specifications. The purpose
19 of the implementation is to design the gateway to AT&T's
20 specifications, but there are certain things that our
21 systems don't do.

22 Q Well, I believe that the interconnection
23 agreement requires the parties to work together to
24 substantially define mutually agreeable specifications by
25 March 1st, 1997. Was that done?

1 A Yes, substantially it was.

2 Q Is it your testimony that the items listed as one
3 and two at the bottom of page 5 of the attachment and
4 number 3 at the top of page 6 were not mutually agreed
5 upon?

6 A I would have to take these one at a time, but to
7 my knowledge, there has been no mutual agreement to do what
8 I understand AT&T to be meaning by each of the statements
9 here; and the way they are written, it's not totally clear
10 exactly what they are saying. But I mean I can go through
11 each one and explain them; but no, there has not been any
12 mutual agreement on these particular things from which
13 BellSouth is now deviating.

14 Q Now if you quickly leap through the next couple
15 of pages, you'll find a number of other tables and fields
16 that indicate the parties are on target on a lot of these
17 items; is that correct?

18 A Yes.

19 Q And on target means what?

20 A Well, again, this is an AT&T report, so I don't
21 know if it's appropriate for me to speculate on what they
22 mean by on target. My understanding of on target means
23 that as far as we know the implementation date is on
24 schedule.

25 Q Turning to page 10 of the attachment, looking at

1 Paragraph 5.1, there is a Paragraph A listed under that.

2 Could you read that paragraph?

3 A Description of project as described in the
4 AT&T/BellSouth Georgia interconnection agreement,
5 Attachment 6, Paragraph 2.1.1, quote, as an interim
6 process, BellSouth will provide AT&T with bills in the
7 CRIS, slash, CLUB format for those services purchased by
8 AT&T for resale -- and I guess I should point out there is
9 an ellipsis, well, there are actually three in here -- for
10 no more than 180 days after the effective date of this
11 agreement. After that time, BellSouth shall provide bills
12 providing only CABS or the CABS format.

13 Q Now the BellSouth and AT&T agreement in Georgia
14 was effective much earlier than the one in Florida; is that
15 correct?

16 A I don't recall the date.

17 Q Would you accept subject to check that it was
18 February 3rd of this year?

19 A I don't recall the date of the Florida either, so
20 the much earlier, I still have a problem with.

21 Q Would you accept that as being June of this year,
22 subject to check?

23 A All right, subject to check.

24 Q If you turn over to the next page, page 11, it's
25 got some milestones and some dates required, no date

1 accomplished indicated, and a status. Now the date
2 required would be much later in Florida, would it not,
3 because the agreement happened later?

4 A If the language of the agreement is identical.

5 Q Would you accept subject to check that in this
6 regard it is?

7 A Okay.

8 Q And turning to the next page, page 11 at the
9 top -- I'm sorry, you are already on that page. Under the
10 AT&T/BellSouth Georgia agreement, BellSouth was required to
11 send a test file on July 2, 1997 so the parties could
12 implement CABS formatted bills by August 3rd. What is a
13 test file?

14 A A test file is a file of data that both parties
15 will use to test their systems.

16 Q So the parties are working off of common data; is
17 that correct?

18 A Well, I'll say that they both have test data to
19 use.

20 Q And that it matches each other, correct?

21 A I don't know if that is the stated purpose or
22 not.

23 Q Did BellSouth provide the test file, to your
24 knowledge?

25 A Yes, BellSouth --

1 Q When?

2 A Yes, BellSouth provided a test file in July.

3 Q So you disagree with this statement in the letter
4 that BellSouth did not provide this test file in a timely
5 fashion?

6 A What I'm saying is that I don't know -- I know
7 that a test file was provided in July. I don't know the
8 basis for saying that it was originally due on the 2nd
9 versus the 24th. It's going to be dependent upon the
10 billing cycles associated with the particular bill.
11 BellSouth renders bills on nearly everyday of the month, so
12 depending on which billing cycle this test file was
13 associated with it, it may or may not have been appropriate
14 to send it on one or the other of those days. What I can
15 say is that BellSouth did provide a test file in July.

16 Q Okay. And if you drop down to the status box, it
17 says status to begin 7/2, actually began 7/4 and contained
18 fatal errors. What would fatal errors be in a test file?

19 A It would mean that there was some sort of problem
20 with the data.

21 Q What effect would that have on the test?

22 A It would indicate that it was a good idea to have
23 tested.

24 Q Would one be able to complete the test as
25 contemplated by the parties if the test file contained

1 fatal errors?

2 A Depending on the nature of the errors. I mean
3 the purpose of the test file is to test. If the test
4 reveals that there are problems in one of the other
5 systems, then the purpose of the test has been satisfied.

6 Q Wouldn't the final purpose of the test be to get
7 the correct formatted billing?

8 A Yes, and I'm not aware of any belief or any basis
9 for believing that the exchange of a single test file is
10 all that was contemplated by the parties. My understanding
11 of this is that this was the initial test file. It was
12 considered a test by both parties, that AT&T is in the
13 process of refining its system. As I testified during the
14 arbitration, it is no small task to render a CABS formatted
15 bill for a CRIS billed service, and both parties are
16 continuing to refine their systems and that we will, in
17 fact, be continuing to exchange CABS information as well as
18 to provide parallel CRIS bills for some period of time to
19 enable both parties to be certain that things are working
20 properly.

21 Q Which leads to the last question on this
22 document. Can you tell me, since this was filed on August
23 22nd, whether or not BellSouth has been able to provide
24 AT&T with a test file since that time that does not contain
25 fatal errors?

1 A I don't know. My understanding is that we are
2 continuing to work through the testing process. Whether an
3 error free file has been provided, I don't know.

4 MS. RULE: Commissioners, if you could give me a
5 few minutes, I think I can cut most of the remaining
6 questions out.

7 CHAIRMAN JOHNSON: We'll take a 15-minute break.

8 (Recess taken after which the transcript is
9 continued in sequence in Volume XIII)

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