

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

January 16, 1998

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

Re: Docket No. 971814-TP (Sprint Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Jerry W. Moore and W. Keith Milner, which we ask that you file in the above-captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (Print)

ACK _____
AFA _____
ADP _____
CSE _____
Stano, a

E _____ NBWM
L 2
I 2/08 cc All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II
SE 1
VJ _____
OTH _____

W. Moore
DOCUMENT NUMBER-DATE
00980 JAN 16 88
FPSC RECORDS & REPORTING

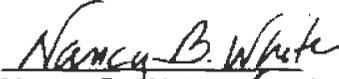
W. Milner
DOCUMENT NUMBER-DATE
00981 JAN 16 88
FPSC RECORDS & REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 971314-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
via U. S. Mail this 16th day of January, 1998 to the following:

Monica Barone
Staff Counsel-FPSC
2540 Sumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6197

C. Everett Boyd, Jr.
ERVIN, VARN, JACOBS & ERVIN
305 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 224-9135
Fax. No. (850) 222-9164


Nancy B. White (Pw)

CONFIDENTIAL

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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF JERRY W. MOORE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET 971314 - TP
JANUARY 16, 1998

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. My name is Jerry W. Moore. My business address is 675 West
Peachtree Street, Room 3J39, Atlanta, GA 30375. I am a Director in
the Interconnection Operations Department of BellSouth.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I attended Jacksonville University, Jacksonville, Florida. I have 33
years of experience with BellSouth. I have held numerous positions in
BellSouth in Network Operations.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
SERVICE COMMISSION, AND IF SO, BRIEFLY DESCRIBE THE
SUBJECT OF YOUR TESTIMONY.

A. I testified before the state Public Service Commissions in Alabama,

1 Kentucky, Mississippi and North Carolina

2

3 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
4 TODAY?

5

6 A. I will present information in response to Issues 1 and 3 and to the
7 complaints filed by Sprint Communications Company Limited
8 Partnership doing business as Sprint and Sprint Metropolitan Networks,
9 Incorporated (Sprint) in this docket. BellSouth's witness, Mr. Keith
10 Milner will address Issues 2, 4 and 5.

11

12 **Issue 1: (Complaint paragraphs 23-40), Has BellSouth provided**
13 **Firm Order Confirmation (FOC) in a timely and accurate manner as**
14 **agreed to by BellSouth and SMNI? (Count I)**

15

16 Q. WHAT IS BELL SOUTH'S RESPONSE TO SPRINT'S ALLEGATION
17 THAT BELL SOUTH FAILED TO PROVIDE FOCs IN A TIMELY AND
18 ACCURATE MANNER?

19

20 A. BellSouth readily acknowledges that the provision of FOCs in the early
21 months of the time period covered by Sprint's complaint were not up to
22 desired standards. However, in the April 25, 1997 correspondence to
23 Sprint (Exhibit E, Sprint Complaint), BellSouth took corrective action by
24 adding service representatives and improving operating systems to
25 properly handle this function. While BellSouth now believes that it is

1 providing FOCs in a timely manner, we are continually evaluating the
2 service order process for potential improvements and for better means
3 of measuring its various components

4
5 Meeting a 48-hour objective for the return of an FOC can be driven by
6 many factors. For example, if the request is for resale the order is
7 usually generated without interaction with other departments and
8 generally takes very little time. If the request is for Unbundled Network
9 Elements (UNEs) such as UNE Loops, which encompasses most of the
10 Sprint orders, a telephone call must be made to another BellSouth
11 group to verify the existence of vacant facilities. If an inadequate
12 number of facilities are available to complete the generation of the
13 order, an attempt to free up facilities is attempted in order to complete
14 the generation of the service order. These efforts require additional
15 time.

16
17
18 Q. Would you please explain how BellSouth processes requests received
19 from Sprint?

20
21 A. Yes. First of all, Local Service Requests (LSR) issued by Sprint are
22 either electronically sent or faxed to the Local Competitive Service
23 Center (LCSC). The electronic requests either flow through the
24 system for BellSouth provisioning of field work or default into a system
25 in the LCSC known as the Local Order Network (LON). Faxed LSRs

1 are manually entered into the LON database. Service Orders are
2 generated by an LCSC service representative from the pending
3 Alternative Local Exchange Company (ALEC) requests that are in the
4 LON data base. When orders are issued by these service
5 representatives, a second manual entry must be posted in the LON
6 system which reflects the date and time the FOC is faxed back to the
7 ALEC, in this case Sprint

8
9 For simple orders such as a single loop over existing facilities to a
10 previously served address, a FOC is typically returned within a few
11 hours because all that must be accomplished is for the LCSC service
12 representative to check on the availability of the facility and issue the
13 order.

14
15 However, the nature of many orders for unbundled loops is that they
16 involve multiple loops or have other complexities. Only when the last
17 service order has been issued is a FOC sent to the ALEC and an entry
18 made in the LON database.

19
20 Q. Does BellSouth have information on average FOC returns?

21
22 A.. Attachment JWM-1 is a summary of monthly activities for Sprint that
23 were logged into the LON data base. In addition the column entitled
24 Total LCSC is the overall average of all ALEC service request activities
25 from the LON system. If a BellSouth LCSC service representative fails

1 to type the FOC return into the LON database in a timely manner.
2 Sprint may have received the notification hours before the database is
3 actually updated. This would add additional time to this measurement
4

5 In summary, BellSouth is now providing FOCs in accordance with the
6 contract, but measurements of its performance must be viewed with an
7 understanding of the skewing effect that complex requests have upon
8 the provision of FOCs.
9

10 **Issue 3: Has BellSouth provided installation intervals for service**
11 **established via unbundled loops in accordance with the**
12 **interconnection agreement between BellSouth and SMNI? (Count**
13 **II)**

14
15
16 Q. HAS BELL SOUTH PROVIDED INSTALLATION INTERVALS FOR
17 SERVICE ESTABLISHED VIA UNBUNDLED LOOPS IN
18 ACCORDANCE WITH THE INTERCONNECTION AGREEMENT WITH
19 SPRINT?
20

21 A. Yes. BellSouth has fulfilled the requirements of its interconnection
22 agreement with Sprint with the installation intervals it has offered.
23 According to BellSouth's review of the Sprint complaint, there have
24 been no allegations to the contrary. Exhibit JWM-2 is a detailed listing
25 of Recommended Unbundled Network Element (UNE) Provisioning

1 Target intervals that are provided to each ALEC. As can readily be
2 seen, the volume and type of service can prompt different intervals. In
3 instances where the volume is 15 UNEs and greater, the intervals are
4 negotiated between BellSouth and the ALEC. This is noted by ICB
5 (individual case basis) in the intervals column.

6

7 BellSouth continues to improve as does Sprint. It is in both parties'
8 best interest to have timely responses and accurate data. BellSouth
9 has made significant progress to this end and is committed to continual
10 improvement.

11

12 Q. Does this conclude your testimony?

13

14 A. Yes

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Special Study - Return of FOCs to Sprint & Total ALECs

| | Sprint | | | Total Number Clarified | Total ALECs |
|-----------|-----------------------------|--------------------------------------|--|------------------------------|--|
| | Total Recorded Orders | Valid Received & FOC Posted | Average Receipt to FOC (hrs & mins) | | Average Receipt to FOC (hrs & mins) |
| April | 5 | 3 | 71 12 | 0 | 76 29 |
| May | 29 | 17 | 125 25 | 0 | 117:01 |
| June | 29 | 27 | 84 23 | 0 | 96:03 |
| July | 45 | 45 | 142 18 | 1 | 77:44 |
| August | 48 | 46 | 28 37 | 4 | 55 16 |
| September | 34 | 34 | 24 53 | 21 | 44 57 |
| October | 63 | 63 | 105 31 | 24 | 44 57 |
| November | 38 | 38 | 49 51 | 6 | 56 25 |
| December | 23 | 23 | 71 35 | 8 | 51 16 |

Recommended UNE Provisioning Targets

| | Quantity | Targeted Installation Interval (In business days) |
|---|----------|--|
| UNBUNDLED LOOPS | | |
| 2 Wire analog voice grade loop | 1 - 5 | 5 |
| | 6 - 14 | 7 |
| | 15 + | ICB |
| 4 Wire analog voice grade loop | 1 - 5 | 5 |
| | 6 - 14 | 7 |
| | 15 + | ICB |
| 4 Wire DS1 & PRI digital loop | 1 - 5 | 5 |
| | 6 - 14 | 7 |
| | 15 + | ICB |
| 2 Wire ISDN digital loop | 1 - 5 | 4 |
| | 6 - 14 | 5 |
| | 15 + | ICB |
| ADSL - 2 Wire asymmetrical digital subscriber line loop | 1 - 14 | 30 |
| | 15 + | ICB |
| HDSL - 2 wire & 4 wire high bit rate digital subscriber line loop | 1 - 14 | 30 |
| | 15 + | ICB |
| LOOP CONCENTRATION (Inside Plant) | | |
| Loop channelization system | 1 | 90 |
| Central Office Channel Interfaces 2Wire voice | 1 | 30 |
| Central Office Channel Interfaces 4 Wire voice | 1 | 30 |
| SUB LOOPS (Outside Plant) | | |
| Loop Feeder | 1 | 30 |
| Loop Concentration (dependent on equipment and right of way) | 1 | 30-90 |
| NETWORK INTERFACE DEVICE (NID) | | |
| NID TO NID Cross Connect 2 wire | 1 - 14 | 5 |
| | 15 + | ICB |
| NID To NID Cross Connect 4 wire | 1 - 14 | 5 |
| | 15 + | ICB |
| NID Spare Capacity | 1 - 14 | 5 |
| | 15 + | ICB |
| OPEN AIN (OAIN) | | |
| OAIN tool kit | 1 | 45 |
| OAIN service management system | 1 | 45 |

Recommended UNE Provisioning Targets

| | Quantity | Targeted installation interval (In business days) |
|---|----------|--|
| CCS7 SIGNALING TRANSPORT SERVICE | | |
| A-Link Signaling | 1 | 60 |
| D-Link Signaling | 1 | 60 |
| STP Signaling Transfer Point | 1 | 60 |
| UNBUNDLED INTEROFFICE TRANSPORT | | |
| Interoffice Transport Analog line grade | 1 | 30 |
| Interoffice Transport DSO | 1 | 30 |
| Interoffice Transport DS1 | 1 | 30 |
| Interoffice Transport DS3 | 1 | 30 |
| O/S AND DA UNES | | |
| Operator Call Processing - OPCH, FACH, BLV, EI, ECT | 1 | 30 |
| Operator Call Processing - Facility Based OPCH, FACH, ECT | 1 | 30 |
| Operator Call Processing - Facility Based BLV, EI | 1 | 30 |
| Directory Assistance Access Service (DAAS) | 1 | 30 |
| Directory Assistance Call Completion (DACC) | 1 | 30 |
| Directory Assistance Number Services Intercept (DANSI) | 1 | 30 |
| Directory Assistance Transport | 1 | 30 |
| Directory Assistance Database Service (DADS) | 1 | 30 |
| Direct Access to DA service (DADAS) | 1 | 30 |
| DIGITAL CROSS CONNECT | | |
| DCS 1/0 | 1 | 7 |
| DCS 3/1 | 1 | 7 |
| DCS 3/0 | 1 | 7 |
| CUSTOMIZED CALL ROUTING (Selective Routing - LCC) | | |
| 1 - 5 LCC | 1 - 5 | 30 |
| 6 - 25 LCC | 6 - 25 | 60 |
| > 25 LCC | 25 + | ICB |
| UNBUNDLED LOCAL SWITCHING | | |
| 2 Wire analog line port | 1 - 10 | 3 |
| | 11 - 25 | 4 |
| | 25 + | ICB |
| Hunting | 1 | 5 |
| 2 Wire analog DID trunk port | 1 - 10 | 5 |
| | 11 - 25 | 6 |
| | 25 + | ICB |
| 2 Wire ISDN digital line side port | 1 - 10 | 5 |
| | 11 - 25 | 6 |
| | 25 + | ICB |

Recommended UNE Provisioning Targets

| | Quantity | Targeted Installation Interval (In business days) |
|---|----------|--|
| 4 Wire ISDN DSI digital trunk port | 1 - 10 | 5 |
| | 11 - 25 | 5 |
| | 25 + | ICB |
| Switching functionality | 1 | 5 |
| Unbundled Local Usage (entire local calling area) | 1 | 5 |
| UNBUNDLED ACCESS TO OSS | | |
| Preorder | 1 | 30 |
| Order/Provisioning | 1 | 30 |
| Maintenance/repair | 1 | 30 |
| ACCESS TO DATABASES | | |
| 800 Database | 1 | 7 |
| Line Information Database (LIDB) | 1 | 30 |
| NUMBER PORTABILITY | | |
| RCF - Remote Call Forwarding | 1 - 25 | 2 |
| | 25 - 50 | 3 |
| | 51 + | ICB |
| DID - Direct Inward Dial | | |
| Initial request - trunk group to be established | Initial | 30 |
| Subsequent request - trunk group in place | 1 - 100 | 5 |
| | 100 + | ICB |

- NOTES 1 The assigned provisioning date assumes the availability of facilities and equipment
 2 ICB means Individual Case Basis. Contact your Account Manager to determine the appropriate interval