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February 6, 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. 971314-TP (Sprint Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal 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 (ke)

Nancy B. White

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Stavanya
- CTR _____
- EAG _____
- LEG 2
- LIN 2+018
- OPC _____
- REC _____
- SEC I
- WAS _____
- OTH _____

NBWM

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

Moore

Milner

DOCUMENT NUMBER-DATE
01981 FEB-6 8
FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
01982 FEB-6 8
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 6th day of February, 1998 to the following:

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Nancy B. White
Nancy B. White

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF JERRY W. MOORE
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET 971314 - TP
5 FEBRUARY 6, 1998

6
7 Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
8 BELL SOUTH TELECOMMUNICATIONS, INC.

9
10 A. My name is Jerry W. Moore. My business address is 675 West
11 Peachtree Street, Room 3J39, Atlanta, GA 30375. I am a Director in
12 the Interconnection Operations Department of BellSouth.

13
14 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

15
16 A. I attended Jacksonville University, Jacksonville, Florida. I have 33
17 years of experience with BellSouth. I have held numerous positions in
18 BellSouth in Network Operations.

19
20 Q. ARE YOU SAME THE JERRY MOORE WHO EARLIER FILED
21 DIRECT TESTIMONY IN THIS DOCKET?

22
23 A. Yes. I filed direct testimony concerning issues 1 and 3.

24
25

DOCUMENT NUMBER 01981 FEB-68
PPS: [unclear] [unclear]

1 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
2 TODAY?

3

4 A. I will present rebuttal to the testimony of Sprint witnesses Melissa L.
5 Cloz, Mildred A. Graham, and Richard A. Warner on Issues 1 and 3.
6 BellSouth witness Keith Milner will respond to Issues 2, 4, and 5.

7

8 Q. WHAT IS BELLSOUTH'S RESPONSE TO SPRINT'S TESTIMONY
9 THAT BELLSOUTH FAILED TO PROVIDE FOCs IN A TIMELY AND
10 ACCURATE MANNER?

11

12 A. As set forth in my direct testimony, BellSouth readily acknowledges that
13 the provision of FOCs in the early months of the time period (May 1997
14 to September 1997) covered by Sprint's complaint were not up to
15 desired standards, however we do not agree with Sprint that BellSouth
16 is currently having a significant problem with the timely return of FOCs.
17 BellSouth completely understands the potential impact on the ultimate
18 end user if the FOC process does not function smoothly, a subject
19 which constitutes the bulk of the testimony of the Sprint witnesses.

20

21 Q. HAS SPRINT PROVIDED ADEQUATE SUPPORTING INFORMATION
22 CONCERNING ISSUE 1 OF ITS COMPLAINT ?

23

24 A. No. The exhibits are inadequate or misleading as to the issues in this
25 docket. For example, Ms. Cloz's Exhibit No. MLC-3 filed as part of her

1 direct testimony on January 16, 1998, in Florida Docket 971314-TP
2 purports to show that BellSouth has not met the FOC commitment.
3 The Exhibit, however, contains a mixture of Local Service Requests
4 (which are the proper subject of Issue 1 in this docket) with Access
5 Service Requests (which are not a subject of this docket but are
6 covered under State or Federal access tariffs.) Ms. Cloz even labels
7 her exhibit as "ASRs" in each of the 9 months of data with no reference
8 to LSRs. By intermingling these Access Service Requests with Local
9 Service Requests and using all of them in her calculations at the top of
10 each page for FOCs returned within 48 hours, Ms. Cloz produces a
11 meaningless and irrelevant result.

12

13 Even had a pure report of Local Service Requests constituted the data
14 for Exhibit MLC-3, the parameters of the report could not produce a
15 meaningful result. The FOC targets are defined in terms of hours, not
16 days. Yet the fifth column of Ms. Cloz's exhibit is labeled "Number of
17 Business Days From ASR to FOC." Therefore, a service request
18 received late on Day 1 and responded to early on Day 3 could be well
19 within the 48 hour target interval but would appear to be outside the
20 interval if the far less precise "Business Day" term were used.

21 Therefore, it is impossible to correlate her conclusions with BellSouth's
22 own records for the time periods involved in this complaint.

23

24 Q. DO YOU HAVE ANY COMMENTS CONCERNING THE STATISTICS
25 OFFERED BY SPRINT WITNESS CLOSZ?

1 A. Yes, I have found it somewhat difficult to reconcile Sprint's calculations
 2 in Ms. Cloz's testimony with the information provided in response to
 3 BellSouth's interrogatory number 3. The following table illustrates the
 4 problem:

5

1. Month	4/97	5/97	6/97	7/97	8/97	9/97	10/97	11/97	12/97
6 2. Orders submitted per MLC-3	19	18	15	10	13	12	21	22	11
7 3. Orders submitted per Interrogatory	24	29	27	28	24	36	24	12	2

10

11 Cloz Exhibit MLC-3, pages 1 through 9, shows one set of figures for
 12 the total number of Sprint service requests for April through December
 13 1997 as displayed on line 2. Yet Sprint's response to BellSouth's
 14 interrogatory displays an entirely different set of numbers as displayed
 15 on line 3. Further, in attempting to understand the differences in these
 16 numbers, we found differences between these reports in the number of
 17 FOCs received within 48 hours:

18

19

1. Month	4/97	5/97	6/97	7/97	8/97	9/97	10/97	11/97	12/97
20 2. FOCs received w/ 48 hrs per MLC-3	1	8	4	6	7	7	19	18	7
21 3. FOCs received w/ 48 hrs per Sprint Interrogatory response	6	19	19	22	17	33	24	8	1

23

24

25

1 It is obvious that there is a misunderstanding on Sprint's part as to how
2 many orders were submitted, how many FOCs were received within 48
3 hours from BellSouth, and how many orders were LSRs versus ASRs.
4 Without a reliable figure for the number of orders, it is impossible to
5 calculate the percentage of orders that did or did not receive FOCs
6 within the 48 hour target interval.

7

8 Part of the difference in the numbers may be explained by Sprint's
9 possible failure to include in its count those orders that were canceled.
10 FOCs are furnished on all orders and any calculations should be based
11 on total submitted orders. The fact that some may be canceled later for
12 any number of valid reasons should not affect the base of orders used
13 to calculate performance on returning FOCs.

14

15 Another part of the difference may relate to the way each company
16 chooses to count orders. A purchase order number (PON) may contain
17 just one service request or several hundred service requests.
18 BellSouth must disaggregate the PON into individual service orders to
19 enter them into the various operating systems. Performance
20 measurements are based on the combined results of all individual
21 service orders. But as discussed elsewhere, the handling of large,
22 complex orders may negatively impact statistical results even though
23 the work functions performed may have met the genuine needs of the
24 companies and the end users involved in the process.

25

1 C. WITNESS GRAHAM, IN HER TESTIMONY ON PAGES 3 THROUGH
2 6 AND EXHIBIT MAG-1, PAGES 8 AND 9, RAISES WHAT APPEARS
3 TO BE A SIMILAR ISSUE. PLEASE COMMENT.

4
5 A. Witness Graham raises the same exact issue and reaches the same
6 erroneous conclusions as witness Cloz. Thus, my previous discussion
7 on FOCs also applies to the testimony of witness Graham.

8
9 Q. WITNESS WARNER, IN HIS TESTIMONY ON PAGES 4 THROUGH 8,
10 ALSO APPEARS TO DISCUSS THIS ISSUE. PLEASE COMMENT.

11
12 A. Apparently, Sprint has used three separate witnesses to discuss the
13 exact same issue. Once again, my previous discussion applies.

14
15 Q. IS YOUR RESPONSE ANY DIFFERENT?

16
17 A. Yes. Mr. Warner discusses one additional exhibit in a way that is very
18 misleading. Pages 65 through pages 79 of his Exhibit No. RAW-2 are
19 presented as portions of the Interconnection Agreement signed on
20 March 13, 1997 that he negotiated and executed on behalf of Sprint. A
21 search of BellSouth records revealed that this is not a part of the March
22 13, 1997 Interconnection Agreement, but rather is a spreadsheet for a
23 conversion of 548 coin stations at the Orlando Airport from BellSouth
24 service to Sprint service. Due to the large number of orders involved,
25 this effort was given project status to ensure close coordination

1 between BellSouth and Sprint personnel. Two BellSouth technicians
2 were designated to work with Sprint on site to avoid disruptions of
3 service to end users. Orders were issued based on Sprint's conversion
4 plans, and FOCs were generally issued within a few hours. The
5 conversion was viewed as being very successful by both BellSouth and
6 Sprint personnel involved. Indeed, the on site Sprint personnel verbally
7 complimented the professionalism and responsiveness of BellSouth's
8 two field technicians. We are very surprised to see the handling of this
9 particular set of orders portrayed in a negative way. No specific
10 information was provided by Mr. Warner as to any specific problem,
11 and therefore it becomes impossible to devise a definitive response.

12

13 Q. DOES BELLSOUTH BELIEVE THAT REGULATORY RELIEF IS
14 CALLED FOR WITH REGARD TO THIS ISSUE?

15

16 A. No. Such action is not required. BellSouth is committed to jointly work
17 with Sprint and other ALECs to ensure the timely return of FOCs and a
18 fuller understanding of the impact of incorrect orders and complex
19 orders upon statistical measurements for this area. As a part of its
20 effort to further improve its performance on the provision of FOCs as
21 well as other aspects of the service order process, BellSouth is adding
22 58 service representatives to its LCSCs during January and February,
23 1998. This will increase the production work force by 58 percent from
24 163 service representatives to 258 service representatives.

25

1 Q. IS A GENERIC DOCKET NEEDED TO ESTABLISH PERFORMANCE
2 MEASUREMENTS AND SERVICE QUALITY STANDARDS AS
3 SUGGESTED BY WITNESS CLOSZ?
4

5 A. No. BellSouth is currently developing generic performance
6 measurements to satisfy the concerns of various State Commissions as
7 well as the FCC.
8

9 Q. HOW DO YOU RESPOND TO WITNESS GRAHAM'S
10 CHARACTERIZATION OF BELL SOUTH'S PERFORMANCE IN
11 MEETING SERVICE DUE DATES FOR THE FOURTH QUARTER OF
12 1997?
13

14 A. Witness Graham discusses fourth quarter statistical results on page 19
15 of her testimony. I have displayed her total number of service orders
16 for each month and BellSouth's numbers in the chart below. As can be
17 seen, there is a considerable difference, primarily due to the number of
18 orders in the base:

Month	Sprint View of # of Orders (Graham Pg. 19)	BellSouth View of # of Orders (Exh JWM-1)
October	28	63
November	21	36
December	11	23

24
25

1 As discussed earlier (reference charts on page 4 and related
2 paragraphs on pages 4 and 5), we have been unable to reconcile the
3 differences between the two companies' numbers. Further, Ms.
4 Graham's numbers on total number of orders are inconsistent with
5 those used by Sprint's other witness Ckrsz for the months of October
6 and November (Exhibit MLC-3 of Ms. Cloz direct testimony of January
7 16, 1998) and those submitted in response to BellSouth interrogatory
8 number 2. Therefore, we believe Ms. Graham's calculations
9 concerning the meeting of service installation dates are erroneous.
10 According to BellSouth's calculations, service appointments have been
11 met at a consistently high level. In an attempt to replicate Ms.
12 Graham's view of the order base (that is both LCSC and ICSC orders),
13 I calculate that appointments for Sprint were met 86.2% in November,
14 1997, and 96.9% in December, 1997, which are considerably better
15 results than the 76.2% and 63.7% as calculated by Ms. Graham for
16 these same two periods.

17
18 Q. WHAT IS YOUR RESPONSE TO WITNESS WARNER'S
19 DISCUSSION OF INSTALLATION INTERVALS ON PAGE 25 OF HIS
20 TESTIMONY?

21
22 A. Mr. Warner implied that BellSouth is not offering parity between UNE's,
23 with a 5-day installation interval, and local service from BST's retail
24 unit, where shorter intervals may be offered. Mr. Warner has made an
25 apples to oranges comparison. An Unbundled 2-Wire Loop is a

1 **designed circuit. A typical local service line (POTS) available from**
2 **BellSouth's business offices is a non-designed circuit. To further**
3 **illustrate: A POTS line simply originates in a BellSouth switch office**
4 **equipment (OE), and has a 2-wire jumper wire run to the main**
5 **distribution frame, which goes to the cable pair in the field. However,**
6 **an unbundled loop for Sprint or any ALEC looks something like this:**
7 **The dial tone originates at the ALEC's switch, travels over an Access**
8 **T1 (inter-office) trunk to a DACS, or Channel Bank, then cross**
9 **connects to a SMAS (Remote Test Access) point, then is cross**
10 **connected through a channel unit, and ultimately connects with the**
11 **cable pair at the main distribution frame. There are usually several**
12 **analog to digital, and digital to analog conversions involved in each**
13 **circuit. This is much closer in design to an analog, special access**
14 **circuit such as a Voice Grade Circuit in the FCC Tariff than to a POTS**
15 **line.**

16
17 **The target intervals that have been published (see my direct testimony**
18 **Exhibit JWM-2) reflect the time, on average, necessary to properly**
19 **process orders through the appropriate operating systems. When no**
20 **roadblocks are encountered, orders are worked sooner than the**
21 **standard interval if possible when a customer desired due date has**
22 **been requested.**

23

24 **Q. WHAT IS YOUR RESPONSE TO WITNESS WARNER'S STATEMENT**
25 **ON PAGE 25 OF HIS TESTIMONY THAT BELLSOUTH IS BILLING A**

1 **\$203 "ESCALATION" CHARGE FOR EACH WORK ORDER FOR**
2 **WHICH INSTALLATION IS REQUESTED SOONER THAN PROVIDED**
3 **IN THE STANDARD TARGET INTERVAL GUIDE?**

4
5 **A. BellSouth is surprised to see this item in Mr. Warner's testimony.**
6 **Concerns about an escalation charge were not included in Sprint's**
7 **original complaint. There was no mention of an escalation charge**
8 **during the issue identification conferences with the FPSC Staff. This**
9 **matter has not been brought to BellSouth's attention as a concern**
10 **independent of Mr. Warner's testimony.**

11
12 **We have discovered that BellSouth personnel may have confused**
13 **Sprint's orders for unbundled loops placed with the Local Company**
14 **Service Center(LCSC) with Sprint's orders for special access services**
15 **(DS1s, DS3s, etc.) placed with the Interexchange Carrier Service**
16 **Center (ICSC)used for their interoffice traffic. FCC Tariff No. 1, Section**
17 **5.1.1 sets forth a charge similar to that described by Mr. Warner. The**
18 **ICSC would properly apply an expedite charge to Sprint's special**
19 **access circuits such as DS1s or DS3s if the conditions of the tariff were**
20 **met. We are aware that Sprint has utilized the ICSC for ordering**
21 **numerous DS3 LightGates, and DS1 or HICAPS out of the FCC Tariff**
22 **wherein such charges might be applied. However, BellSouth has**
23 **learned that 9 orders for local service requests were incorrectly**
24 **assessed the expedite charge. Appropriate credits are being issued.**
25

1 Any future occurrences should be promptly brought to the attention of
2 BellSouth's Sprint Account Team.

3

4 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

5

6 A. Yes.

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