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February 20, 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. 971140-TP (Recombination Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of D. Daonne Caldwell, Jerry Hendrix, Eno Landry and Alphonso J. Varner, which we ask that you file in the 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 *(bw)*

Enclosures

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

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CERTIFICATE OF SERVICE
DOCKET NO. 971140-TP (Recombination Issues)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express 20th day of February, 1998 to the following:

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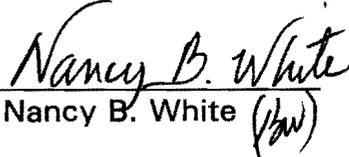
Nancy B. White
Nancy B. White (bw)

1   **BELLSOUTH TELECOMMUNICATIONS, INC.**

2   **REBUTTAL TESTIMONY OF ENO LANDRY**

3   **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

4   **DOCKET NO. 971140-TP**

5   **FEBRUARY 20, 1998**

6

7 Q.   PLEASE STATE YOUR NAME , BUSINESS ADDRESS AND

8   EMPLOYMENT.

9

10 A.   My name is Eno Landry. My business address is Suite 500, 3000

11   Riverchase Galleria, Birmingham Alabama. I am employed by

12   BellSouth Telecommunications, Inc., hereinafter referred to as

13   "BellSouth" or "the Company".

14

15 Q.   ARE YOU THE SAME ENO LANDRY WHO FILED DIRECT

16   TESTIMONY IN THIS DOCKET?

17

18 A.   Yes.

19

20 Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?

21

22 A.   The purpose of my rebuttal testimony is to address assumptions made

23   by MCI witness Mr. Hyde and AT&T witness Mr. Lynott concerning the

24   work functions associated with providing unbundled network elements

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1   (UNE) to an Alternative Local Exchange Company (ALEC) and the

2   complexity of separating a loop and a port into unbundled elements.

3

4 Q.   MR. HYDE, ON PAGES 4 THROUGH 7 OF HIS TESTIMONY, AND

5   MR. LYNOTT, ON PAGES 3 THROUGH 7 OF HIS TESTIMONY,

6   ASSUME THAT VERY LITTLE WORK IS REQUIRED TO PROVISION

7   AN UNBUNDLED NETWORK ELEMENT. ARE THEY CORRECT?

8

9 A.   No. Messrs. Hyde and Lynott fail to recognize the differences between

10   provisioning resold services and unbundled network elements. Resale

11   is an integrated process that manages all of the elements necessary for

12   that service in one process flow. It does not require the separation of

13   the network into elements nor does it require connectivity of an element

14   to an ALEC at a handoff point. The unbundled network element

15   process, as described in my direct testimony, requires the separation of

16   the BellSouth network into discrete network elements that can be

17   handed off to an ALEC so that the ALEC can interconnect with its

18   network to complete a service connection to an end user. This

19   requirement for separation, along with the necessary hand off to an

20   ALEC at either a carrier facility for transportation or to a collocation

21   space, generates a level of complexity that both of these witnesses fail

22   to acknowledge in their testimony.

23

24   The differences in complexity between provisioning resale and

25   unbundled network elements that I have discussed above also can

1   cause ALECs to generate errors in the data submitted on their service

2   requests. This affects the fallout rates that BellSouth must resolve

3   during the ordering and provisioning processes. The fallout rate for

4   unbundled network elements is substantially higher than the fallout rate

5   for resale.

6

7 Q. MR LYNOTT, ON PAGES 7 THROUGH 9 OF HIS TESTIMONY,

8   COMPARES A PRIMARY INTEREXCHANGE CARRIER (PIC) CODE

9   CHANGE TO PROVISIONING UNBUNDLED ELEMENTS. IS THIS

10   COMPARISON ACCURATE?

11

12 A. No. Generally speaking, the PIC change process is a much simpler

13   process than the provisioning of resale or unbundled network elements.

14   A PIC change is generally a very simple record update without any

15   customer name change. As I described earlier, the process of

16   unbundling elements and making them available to an ALEC is a

17   complex process which includes separation of the network into

18   component elements and then handing off the UNE components

19   requested by the ALEC. The combination of a loop and a port as

20   addressed in Mr. Lynott's testimony is resale. It is an assembled

21   service not unbundled network elements.

22

23 Q. MR. HYDE, ON PAGE 5 OF HIS TESTIMONY, MAKES CERTAIN

24   ASSUMPTIONS CONCERNING THE DIP/DOP PROCESS ARE

25   THOSE ASSUMPTIONS CORRECT?

1

2 A.   No. The term DIP/DOP represents Dedicated Inside Plant and

3   Dedicated Outside Plant. Mr. Hyde uses the DIP/DOP to assume that

4   facilities are dedicated to a particular address (i.e., always in place for

5   turning up services). Moreover, Mr. Hyde assumes that, when a

6   service is disconnected, the provisioning process provides that address

7   with what is referred to as "soft dial tone". Soft dial tone provides

8   limited dialing capability to a new resident in a previously occupied

9   premises (generally used to allow the customer to call 911, the

10   business office, etc.) .

11

12   In responding to the DIP/DOP issue, some facilities assumed by Mr.

13   Hyde to be dedicated will need to be separated to provision a UNE.

14   They cannot remain as dedicated end-to-end facilities both inside and

15   outside and support an unbundled network element because they

16   must be separated to be unbundled. Soft dial tone that is provided by

17   the BellSouth switch providing service to an end user is applicable to

18   retail and resale services. It is not applicable to unbundled network

19   elements.

20

21   However, once the ALECs are connected to an unbundled network

22   element, the ALECs can activate and utilize "soft dial tone" from their

23   switch to accomplish functions similar to what BellSouth uses, such as

24   soft dial tone, to support its end users.

25

1 Q. MR. HYDE, ON PAGES 8 THROUGH 12 OF HIS TESTIMONY,

2   DISCUSSES ADJUSTMENTS WHICH RESULT IN REDUCING

3   PROVISIONING WORK TIMES SHOWN IN BELLSOUTH'S NON-

4   RECURRING COST STUDIES. IS HE CORRECT IN HIS

5   ASSUMPTIONS?

6

7 A. No. As discussed in my direct testimony and earlier in this testimony,

8   the processes for unbundling a loop and a port require more than a

9   records update. They require physical separation from each other and

10   interconnection to an ALEC so that those elements can be managed by

11   the ALEC as part of its network. Mr. Hyde is incorrect in his

12   assumptions that these elements can remain interconnected and also

13   be unbundled network elements. If the elements remain

14   interconnected, they constitute a working service; therefore, the service

15   should be treated the same as resale.

16

17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18

19 A. Yes it does.

20

21

22

23

24

25