

ORIGINAL

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2 DOCKET NO. 980119-TP

3 DIRECT TESTIMONY OF JOHN REINKE

4 SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.

5 March 25, 1998

6

7

Q. PLEASE STATE YOUR NAME AND ADDRESS.

8

A. My name is John Reinke. My business address is 2620

9

S.W. 27th Avenue, Miami, Florida 33133-3001.

10

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Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

12

A. I am employed by Supra Telecommunications & Information

13

Systems, Inc. ("Supra") as Vice President for Engineering.

14

15

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK

16

EXPERIENCE.

17

A. I received a Master's Degree in Telecommunications

18

Engineering. My telecommunications career began in the

19

U.S. Army Signal Corps with tours in Vietnam and Germany.

20

I have worked in the telecommunications industry for over

21

25 years with BellSouth. My area of specialization is

22

network switch and cable engineering. I worked in the

23

sales, marketing, engineering, outside plant, inside wire,

24

fiber installation and research departments of BellSouth.

25

26

Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?

27

A. My present responsibilities include the engineering

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FPSC-RECORDS/REPORTING

1 activities necessary for Supra Telecommunications &
2 Information Systems, Inc. ("Supra") to become a facilities-
3 based alternative local exchange carrier, as well as any
4 current engineering needs. I have also been involved in
5 the day to day operations of Supra.

6

7 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

8 A. The purpose of my testimony is to address Issues 4c and
9 4d.

10 ISSUE NO. 4: HAS BELLSOUTH FAILED TO PROPERLY IMPLEMENT
11 THE FOLLOWING PROVISIONS OF ITS INTERCONNECTION,
12 COLLOCATION, AND RESALE AGREEMENTS WITH SUPRA SUCH THAT
13 SUPRA IS ABLE TO PROVIDE LOCAL EXCHANGE SERVICE ON PARITY
14 WITH THAT WHICH BELLSOUTH PROVIDES:

- 15 c. PROVISION OF DIAL TONE;
- 16 d. ELECTRONIC ACCESS TO OPERATIONAL SUPPORT SYSTEMS
17 (OSS) AND OSS INTERFACES (ORDERING AND
18 PROVISIONING, INSTALLATION, MAINTENANCE AND
19 REPAIR);

20 A. Regarding Issue 4c, BellSouth has, on several occasions,
21 failed to provide dial tone to Supra. A specific example
22 of this problem relates to the weekend of November 1st and
23 2nd, 1997, when Supra was moving its corporate location
24 from 269 Giralda Avenue, Coral Gables, Florida, to 2620
25 S.W. 27th Avenue, Miami, Florida. Since Supra is a
26 reseller of BellSouth's service and not just another

1 customer, it was critical that our service not be
2 interrupted so our customers could reach us if they had
3 service problems. Therefore, we requested and were assured
4 of dual service at both locations. We ran into a problem
5 the day before the move on October 31, 1997, and had to
6 cancel the move. It was about 4:30 P.M. when we realized
7 we had no phone service at our old location even though we
8 requested dual service. The service still was not restored
9 until Monday afternoon on November 3, 1997. After numerous
10 complaints on our part, BellSouth apologized. Two weeks
11 later, we were ready to move again. This time we notified
12 BellSouth well in advance and requested dual service again.
13 Our move was scheduled for November 18th and 19th, a
14 Saturday and Sunday. At 4:30 P.M. on the afternoon of
15 November 16, 1997, our service was again disconnected at
16 our old location and was not working at our new location
17 until Saturday, November 18, 1997, on only one line out of
18 24 working lines. It was Monday, November 20, 1997, before
19 all our lines were working again. These difficulties with
20 BellSouth are an indication of the continuing experience of
21 Supra of BellSouth's complete indifference, at a minimum,
22 to Supra's operation as an Alternative Local Exchange
23 Carrier. At worst, they indicate intentional anti-
24 competitive behavior by BellSouth. There was nothing Supra
25 could do since Supra, as a reseller, is totally dependent
26 on BellSouth.

1 d. **ELECTRONIC ACCESS TO OPERATIONAL SUPPORT SYSTEMS**
2 **(OSS) AND OSS INTERFACES (ORDERING AND**
3 **PROVISIONING, INSTALLATION, MAINTENANCE AND**
4 **REPAIR);**

5 A. BellSouth has refused to permit Supra to electronically
6 interface with its operational support systems. BellSouth
7 has demanded that Supra provide all orders manually by fax.
8 This requirement has caused Supra endless trouble. This is
9 a time consuming process that results in constant delays
10 and errors. BellSouth's personnel continually claim that
11 they have not received orders.

12 A specific example of this problem is the attached
13 Exhibit JR-1. This is a letter written by an employee
14 under my direct supervision and control to Mr. Wayne
15 Carnes, Supra's Regional Account Manager at BellSouth,
16 regarding one particular instance. This example represents
17 the norm for Supra's experience with BellSouth. On October
18 31, 1997, our Supra employee, Mr. Philippos Chari, faxed
19 Access Service Requests (ASRs) to connect DS1 and DS3 lines
20 to BellSouth's Mr. Tony Anselmo. On November 4, 1997,
21 after learning that BellSouth had not processed these
22 orders, I called Mr. Sidney Laterrade to inquire as to
23 their status. Mr. Laterrade informed me that he could not
24 locate the ASRs faxed on October 31, 1997. Mr. Laterrade
25 asked that I resend the ASRs and stated that he would get
26 back to us on November 5, 1997. BellSouth did not process

1 the orders nor contact Supra regarding them until I called
2 again on November 13, 1997. At this point I was told by
3 Mr. Laterrade that he again could not locate the ASRs and
4 would I resend them again. We faxed the ASRs yet a third
5 time.

6 As this example demonstrates, BellSouth's requirements
7 for manual processing of orders is incredibly frustrating
8 and clearly not equivalent to the electronic processing
9 BellSouth uses for its own orders. Unless Supra is
10 provided electronic access to BellSouth's operational
11 support systems, Supra will never have a chance to provide
12 local telephone service on parity with BellSouth.

13

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15 A. Yes.



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November 13, 1997

Wayne Carnes
Regional Account Manager

Dear Wayne:

On October 31, I faxed the ASR's for DS1 and DS3 to Tony Anselmo. On November 4, John Reinke called and spoke to Sidney Laterrade but he couldn't locate the forms sent on October 31 and asked John to resend them and that he would get back to us on the 5th. Today on the 13th, I called and spoke with Sidney, who again couldn't locate the forms sent on the 4th. He apologized and asked us to fax them again, which I did.

Given this track record, we would appreciate any assistance or help you could provide to speed up this process.

Sincerely,

Philippos Chari
Engineer

cc: O. A. Ramos

Enclosure