

NANCY B. WHITE
Assistant General Counsel-Florida

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

April 15, 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. 980119-TP (Supra Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Marcus B. Cathey, Patrick C. Finlen, W. Keith Milner, William N. Stacy and David P. Scollard, which we ask that you file in the captioned docket.

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)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU 3 *Siracusa* Enclosures
- CTR _____
- EAG _____
- LEG 2 _____
- LIN 3 _____
- QPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

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

Scollard
DOCUMENT NUMBER-DATE
04316 APR 15 98

Stacy
DOCUMENT NUMBER-DATE
04315 APR 15 98

FPSC-RECORDS/REPORTING

Cathey
DOCUMENT NUMBER-DATE
04312 APR 15 98
FPSC-RECORDS/REPORTING

Finlen
DOCUMENT NUMBER-DATE
04313 APR 15 98
FPSC-RECORDS/REPORTING

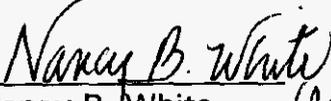
Milner
DOCUMENT NUMBER-DATE
04314 APR 15 98
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980119-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Facsimile and Federal Express this 15th day of April, 1998 to the following:

Beth Keating
Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
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Fax No. (850) 413-6250

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Tallahassee, Florida 32301
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Nancy B. White (PW)

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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF MARCUS B. CATHEY
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980119-TP
April 15, 1998

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. (HERINAFTER REFERRED TO AS "BELLSOUTH" OR "THE COMPANY).

A. My name is Marcus B. Cathey. I am employed by BellSouth Telecommunications Inc. as Sales Assistant Vice President. My address is South E4F1, 3535 Colonnade, Birmingham, Alabama.

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. Currently, my position is Sales Assistant Vice President responsible for handling over 150 different ALECs. I manage a team of 53 people who assist ALECs to start and grow their business throughout the BellSouth serving area.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

1 A. I am a graduate of Baylor University with a B.A. in Political Science.
2 I have 20 years experience in the telecommunications industry. Prior to
3 my current position, I directed product management for transport
4 services including Unbundled Network Elements and Local
5 Interconnection.

6

7 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

8

9 A. This rebuttal testimony is in direct response to direct testimony filed by
10 Supra witnesses Mr. Ramos, Mr. Hamilton and Mr. Reinke regarding
11 their dissatisfaction with our account team, and their allegations that
12 the account team members were unresponsive to Supra's needs.

13

14 Q. What are your expectations of ALECs?

15

16 A. Each ALEC, such as Supra, is assigned an Account Manager
17 responsible for managing the overall relationship between BellSouth
18 and the ALEC. The Account Manager is empowered to call upon a
19 large variety of Subject Matter Experts in order to address specific
20 issues raised by the ALEC.

21

22 Q. DESCRIBE THE ACCOUNT TEAM FROM YOUR ORGANIZATION,
23 SPECIFICALLY AS RELATED TO SUPRA.

24

25

1 A. The Account Manager in this case is Wayne Carnes who currently
2 handles the Supra account along with 17 other ALECs. Mr. Carnes
3 reports to a Sales Director, Mike Wilburn, who then reports to me.
4

5 Q. DESCRIBE YOUR OBSERVATIONS AS TO HOW SUPRA
6 COMPARES TO OTHER ALECS YOU WORK WITH.
7

8 A It is important to understand that in a wholesale business model the
9 customer, in this case Supra, is supposed to be well versed in
10 telecommunications and have complete capabilities to provide service
11 support to its end users. What we have found in some cases is that
12 ALECs begin operations without first investing in education for their
13 work force and establishing efficient processes for responding to the
14 needs of their end users. As a result, they are forced to learn while
15 trying to solve critical operational issues.
16

17 Q. HOW HAVE YOU ATTEMPTED TO WORK WITH SUPRA TO
18 COMPENSATE FOR THEIR ADDITIONAL NEEDS?
19

20 A. What we have tried to do over the last 6 months is to equip Supra with
21 the information they requested in order to evaluate the different
22 scenarios for providing service as an ALEC. Comparatively speaking,
23 we have spent as much planning time with Supra as we have with
24 much larger ALECs with more sophisticated needs. Very early on, we
25

1 identified Supra as a customer seriously interested in becoming a
2 successful ALEC and we have treated them accordingly.

3

4 Q. RELATE ANY SPECIFIC EXAMPLES OF GOING THE EXTRA MILE
5 TO ASSIST SUPRA.

6

7 A. In September of 1997, we invited their Marketing Vice President Bob
8 Campbell to attend our Strategic Advantage Conference to meet with
9 other top executives throughout the telecommunications industry to
10 learn more about our wholesale market effort.

11

12 Since then, we have had numerous discussions, conference calls and
13 meetings trying to address Supra's varied and changing needs. Our
14 objectives on the Account Team are closely aligned with our customers'
15 ability to be successful in the market. This includes not only the direct
16 sale of services to the ALEC but also on how they rate us individually
17 and as an Account Team on providing ongoing service and support.

18

19 Listed below is a brief accounting of the face to face meetings
20 conducted with Supra aside from numerous telephone conversations.

21	Strategic Advantage Conference	9/25/97 - 9/26/97
22	Issues Meeting	10/29/97
23	Issues Meeting	12/5/97
24	Issues Meeting	1/29/98

25

1 Q. WERE YOU SURPRISED TO LEARN THROUGH THIS TESTIMONY
2 THAT SUPRA FELT YOUR TEAM WAS UNRESPONSIVE TO THEIR
3 NEEDS?
4

5 A. Absolutely. As mentioned before, we went to great lengths as an
6 Account Team to respond to their needs, frequently with very short
7 notice. An example of Supra's expectations during this period was a
8 page that I personally received from Mr. Ramos at 8:00am CST on a
9 Saturday in October to discuss general telecommunication issues
10 followed by a second page that same night at 10:00 P.M. This resulted
11 in a face-to-face meeting the next week to discuss issues in more
12 depth.
13

14 Also attached (Exhibit MBC-2) is a letter from Mr. Ramos to me
15 thanking me for our meeting of October 19, 1997.
16

17 Q. WHAT CAUSED SUPRA'S CONCERN?
18

19 A. Much of the discussion regarding Supra's displeasure was with
20 handling end users who wished to return their service to BellSouth.
21 Mr. Ramos' specific request was that we educate each of our retail
22 contact people in Florida to understand who Supra was so they could
23 help explain to the end users that they were only reselling BellSouth's
24
25

1 service. Our response to Mr. Ramos' request was that it was his
2 responsibility to educate the end users on who Supra was, not ours.

3

4 Q. WHAT OTHER ISSUES DID YOU DISCUSS AT THIS TIME?

5

6 A. As Mr. Ramos' testimony indicates, he was very dissatisfied with
7 information BellSouth provides to Supra so they can bill their end user.
8 An interesting observation is that Supra would begin operations without
9 first fully testing their billing capabilities and that they would be waiting
10 on BellSouth's bill to them before they would bill their end user. With all
11 of my other ALECs, they acquire billing information directly from their
12 end user and issue their bill to their end user without having to depend
13 on BellSouth's bill.

14

15

16 Q. DID YOU STATE THAT SUPRA COULD NOT OBTAIN AN
17 INTERCONNECTION AGREEMENT THAT WOULD BE SUPERIOR
18 TO EXISTING AGREEMENTS?

19

20 A. At the time of the discussion, I believe that Supra had already signed
21 its interconnection agreement. I did explain to Mr. Ramos that as a
22 practical matter that the rates he accepted were probably the best he
23 could get given that they had been arbitrated by the FPSC. Mr. Ramos
24 believes the rates he accepted were too high to develop a valid

25

1 business plan.

2

3 Q. DID YOU STATE THAT THERE WAS NO NEGOTIATION OF THE
4 SALE OF BELLSOUTH'S DARK FIBER?

5

6 A. I explained to Mr. Ramos that we had argued in Florida that Dark
7 Fiber was not a separate network element, therefore it would not be
8 offered through the local interconnection agreement.

9

10 Q. DID YOU STATE THAT BELLSOUTH WOULD NOT AGREE TO
11 RESELL ITS BILLING SERVICES TO SUPRA?

12

13 A. Yes, I did confirm BellSouth's position not to resell our billing
14 services.

15

16 Q. WHY DID BELLSOUTH WAIT NINE MONTHS TO SEND AN
17 IMPLEMENTATION TEAM TO VISIT SUPRA?

18

19 A. For several reasons, first the implementation team was refocused
20 late last year to make it more valuable during their visits. All activities
21 were suspended during this review period. Second, due to the rampant
22 increase in number of customers needing a visit, our resources
23 assigned to the implementation team had to be increased dramatically
24 to meet the higher demand for visits. The implementation team is

25

1 provided as a courtesy to our new ALEC customers.

2

3 Q. DURING THE IMPLEMENTATION TEAM VISIT, WAS AN
4 ORDER REJECTED?

5

6 A. Yes. Supra attempted to place an order that was rejected. It was
7 referred to the implementation team for assistance. The order in
8 question was not generated by the implementation team as an
9 example but rather referred to the team for assistance. The order was
10 rejected due to an improper edit which was BellSouth's fault, but later
11 rejected again because the unit number was missing. The order was
12 still pending when the team left. The team later had to assist Supra to
13 resolve the problem.

14

15 Q. WAS THE IMPLEMENTATION TEAM VISIT VALUABLE TO SUPRA?

16

17 A. From the attached feedback form, you can see that Supra felt the visit
18 was very beneficial. (Attachment MBC-3)

19

20 Q. WERE THERE ANY OUTSTANDING ISSUES RESULTING FROM
21 THE IMPLEMENTATION TEAM VISIT?

22

23

24

25

1 A. Yes, as always there were some items which required additional
2 research. At the time of this testimony, Supra should have received
3 our response.

4
5 Q. DID YOU MAKE A JOKE OF SUPRA'S LOSS OF DIAL TONE
6 DURING THE ALTS CONVENTION IN ATLANTA?

7
8 A. I don't remember my exact words to Mr. Ramos regarding his loss of
9 dial tone, but my intent obviously was misinterpreted. Incidentally, I
10 was the one who invited Mr. Ramos to attend the ALTS Show in
11 Atlanta and asked him to stop by our booth. Early that day I had been
12 made aware of an escalation from Mr. Reinke regarding no dial tone at
13 his new location and mentioned to Mr. Ramos that we were working on
14 getting it corrected. Mr Ramos did not appear to have been as upset
15 about the outage as his testimony indicates. We take very seriously our
16 responsibility to provide high quality service to our customers and
17 clearly this would not have been something I would have intentionally
18 *made light of to Mr. Ramos.*

19
20 Q. WHY DID IT TAKE SO LONG TO PROVIDE A COPY OF THE
21 MANUAL THAT EXPLAINS THE SERVICE CAPABILITIES OF THE
22 UNBUNDLED LOOPS?

23
24
25

1 A. Where we have standard information requests, the Account Team can
2 be responsive because the information is available. In Mr. Ramos'
3 case his requests are so comprehensive that often times information is
4 not readily available to meet his needs and has to be assembled.

5

6 Q. DO YOUR "EXPERTS" NOT HAVE CORRECT INFORMATION
7 REGARDING UNBUNDLED LOOPS?

8

9 A. Mr. Ramos did meet with BellSouth's experts regarding
10 Unbundled Loop Services. As a new product in a new market, there
11 will always be additional understanding to be achieved as the
12 product becomes mature. We don't agree with Mr. Ramos that our
13 answers regarding Unbundled Loops are suspect. We believed that
14 Mr. Ramos was satisfied with our answers except for one issue
15 which needs additional clarification concerning a BellSouth policy.

16

17 Q ARE THERE OTHER EXAMPLES OF THE EFFORTS OF YOUR
18 TEAM TO ASSIST SUPRA?

19

20 A. Yes, another example of the extraordinary Account Team support
21 Supra received was the many calls to negotiate payment
22 arrangements. Typically, this falls outside of the Account Team
23 responsibility, but given the sensitivity of the Supra Account, I was

24

25

1 called on many times to negotiate payment arrangements to prevent
2 new service additions from being suspended.

3

4 These payment negotiations occurred at least once monthly over a
5 3 month period.

6

7 Q. HOW WOULD YOU RESPOND TO MR. RAMOS' STATEMENTS
8 ABOUT SUPRA'S BUSINESS STATUS?

9

10 A. BellSouth has invested a great deal of time supporting Supra's entry
11 into the local market. In spite of regulatory complaints, executive
12 escalations and slow payment pattern, the Account Team has
13 continued to work toward assisting Supra establish operations in
14 Florida.

15

16

17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18

19 A. Yes.

20

21

22

23

24

25

COURSE EVALUATION
UNBUNDLED NETWORK ELEMENTS TRAINING CLASS
12/8/97 - 12/10/97

TOPIC	COMMENTS	RATING			
Course Content	Course objectives were met.	1	2	3	4
	Course content is relevant to my job.	1	2	3	4
Course Materials	Materials were current.	1	2	3	4
	Course materials added value to the course.	1	2	3	4
	Pace of instruction was conducive to learning.	1	2	3	4
Course Delivery	Instructor was knowledgeable of the subject matter.				
	Tom Roberts	1	2	3	4
Delivery Environment	Classroom environment was conducive to learning.	1	2	3	4

Please provide suggestions for other topics you would like to have included in this course or in additional courses:

Add a tab in the reference book with definition of terms and acronyms.

Was the length of the course sufficient for the material reviewed?

Additional suggestions for course improvement:

By far the most useful & informative training session I've been to at BST.

Thank you for your participation in the BellSouth CLEC Training Program.

Sulra

Your Company Name

5 = Highest level of agreement.
1 = Lowest level of agreement.



Supra Telecom & Information Systems, Inc.

Docket # 980119
Exhibit MBC-2
Page 1 of 1

Phone: (305) 443 - 3710
Fax: (305) 443 - 1078

P.O. Box 1441221
Coral Gables, FL 33134-4122

WWW & Email:
www.supratelecom.com
sales@supratelecom.com

Date: October 29, 1997

Marcus B. Cathey
Sales Assistant Vice President
CLEC Interconnection Sales

Fax No.: 1 205 977 0037

Dear Mr. Cathey,

May I, on behalf of the entire management and staff of Supra Telecommunications and Information Systems, Inc., express my appreciation at the quality time you spent at our meeting of today. We are particularly impressed with your style and appreciable knowledge of the issues confronting our company at this point in time.

We hope that this is the beginning of a lasting and fruitful relationship between our two corporations.

Respectfully yours,


Q. A. RAMOS
CEO

11/3 SC
cc: Joe Baker
Steve Inman
This was sent following
his complaint to FLETC
I hope we can turn the
corner & have better relations.

MAN
11/5

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

Could bot a little longer but
it was very very professional for
the time it lasted

Name (optional):

John Kelly
V.P. Manager

FAX (404) 927-7113

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Very Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

Very Useful. Judy, John and Sandra's expertise gave me a brand new perspective on the Telecom business.

Very professional, friendly and "go-to" people.

Name (optional): *Daniel Arcin*

FAX (404) 927-7113

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

This is a nice procedure, the reps
i.e. (best reps) are knowledgeable. this procedure
needs to be repeated to ensure proper fixing of clec.

Name (optional): _____

FAX (404) 927-7113

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

Name (optional): _____

FAX (404) 927-7113

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

Name (optional): _____

FAX (404) 927-7113

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

Name (optional): LILIA BARBOSA - STIS

FAX (404) 927-7113

CLEC Follow-up Questionnaire

1. Did the information covered in the Validation Meeting meet your expectations?

Exceeded Expectations Met Expectations Did Not Meet Expectations

2. Were questions answered in a timely manner?

Exceeded Expectations Met Expectations Did Not Meet Expectations

3. Was this meeting beneficial in helping you do business with BellSouth?

Exceeded Expectations Met Expectations Did Not Meet Expectations

4. Were the BellSouth Representatives professional, courteous, and knowledgeable?

Exceeded Expectations Met Expectations Did Not Meet Expectations

5. Additional comments:

Name (optional): _____

