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**BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF DAVID P. SCOLLARD
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.**

**A. I am David P. Scollard, Room 26D3, 600 N. 19th St., Birmingham, AL
35203. My current position is Manager, Customer Billing Services at
BellSouth Telecommunications ("BellSouth"). In that role, I am
responsible for overseeing the implementation of various changes to
BellSouth's Customer Records Information System ("CRIS") and
Carrier Access Billing System ("CABS").**

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

**A. I graduated from Auburn University with a Bachelor of Science Degree
in Mathematics in 1983. I began my career at BellSouth as a Systems
Analyst within the Information Technology Department with
responsibility for developing applications supporting the Finance
organization. I have served in a number of billing system design and
billing operations roles within the Customer Billing Services**

1 organization. Since I assumed my present responsibilities, I have
2 overseen the progress of a number of billing system revision projects
3 such as the implementation of the 1997 Federal Communications
4 Commission ("FCC") access reform provisions, billing of unbundled
5 network elements ("UNEs"), as well as the development of billing
6 solutions in support of new products offered to end user customers. I
7 am familiar with the billing services provided by BellSouth to local
8 competitors, interexchange carriers and BellSouth's end user
9 customers.

10

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
12 TODAY?

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14 A. The purpose of my rebuttal testimony is to address allegations made
15 by Supra witness Mr. Ramos concerning the billing products and
16 capabilities BellSouth offers to Alternative Local Exchange Companies
17 ("ALECs"), in general, and Supra, specifically.

18

19 Q. MR.RAMOS, ON PAGE 17 OF HIS DIRECT TESTIMONY, ALLEGES
20 THAT BELL SOUTH HAS FAILED TO PROPERLY IMPLEMENT THE
21 PROVISIONS OF THE INTERCONNECTION AGREEMENT IN THE
22 AREA OF BILLING AND THAT THIS IS SOMEHOW PART OF A
23 DESIGN TO ASSURE THAT RESELLERS DO NOT SUCCEED. DO
24 YOU AGREE WITH ANY PART OF THAT ALLEGATION?

25

1 A. Absolutely not. BellSouth makes available to ALECs a number of billing
2 output media and interfaces that allow the ALECs to support their end
3 users in substantially the same manner that BellSouth supports its own
4 retail customers. These options include bill formats available to
5 BellSouth's retail customers with additional capabilities such as the
6 Daily Usage Feed that includes records detailing billable events
7 connected with an ALEC's end users. Supra has also been offered
8 these same billing options in Attachment 7 of its Interconnection
9 agreement with BellSouth. I would like to point out that in no part of
10 either Supra's resale or interconnection agreement is there language
11 that suggests BellSouth will perform end user billing on Supra's behalf.
12 Most of Mr. Ramos' allegations deal with billing functions that Supra
13 itself should be performing for its end users. Supra's inability to
14 adequately perform that function does not obligate BellSouth to do it for
15 them.

16

17 Q. MR. RAMOS, ON PAGE 12 OF HIS DIRECT TESTIMONY, ALLEGES
18 THAT BELLSOUTH HAS NOT PROVIDED DAILY USAGE DATA THAT
19 WOULD ALLOW IT TO PROVIDE LOCAL EXCHANGE SERVICES TO
20 ITS END USERS. HOW DO YOU RESPOND TO THAT
21 ALLEGATION?

22

23 A. To date, Supra has not requested the Daily Usage Feed that is
24 provided for in Attachment 7 of its Interconnection Agreement with
25 BellSouth. The process to request this capability is simple. A

1 telephone call or memo to the ALEC's BellSouth Account Executive
2 starts the process to initiate the necessary testing timelines and
3 procedures. If it did request this interface, Supra could input the
4 records contained on the daily files into its systems to bill its end users
5 for billable events such as measured local calls, intra-LATA toll calls
6 carried by BellSouth and other billable activities in substantially the
7 same manner as BellSouth does its own end users.

8

9 Q. MR. RAMOS, ON PAGE 17 OF HIS DIRECT TESTIMONY, STATES
10 THAT BELLSOUTH HAS NOT LIVED UP TO ITS RESPONSIBILITIES
11 IN THE AGREEMENTS. IN PARTICULAR, MR. RAMOS POINTS TO
12 PERCEIVED LIMITATIONS IN CLUB AND THE DISKETTE
13 ANALYZER BILL THAT RESTRICTS SUPRA FROM BILLING ITS END
14 USERS. WHAT ARE THESE TWO BILLING CAPABILITIES?

15

16 A. CLUB stands for Customized Large User Bill. It is a billing capability
17 offered to BellSouth's retail customers as well as to ALECs that allows
18 them to sort billed charges in a number of different levels and options
19 tailored to what the customer requires. Diskette Analyzer Bill ("DAB"),
20 is a billing media that can be loaded on a customer's Personal
21 Computer and perform a number of functions in working with
22 BellSouth's billed charges. With DAB, a customer can produce
23 customized reports, view information, and summarize billed charges to
24 a number of different levels. In addition, the information on DAB can be
25 exported to one of a number of generally available spreadsheets or

1 database applications to integrate billing data with the customer's own
2 systems. A DAB user is provided with a number of instructional
3 manuals including the "DAB User's Guide", the "Beyond DAB"
4 document and numerous electronic help documents included on the bill
5 files mailed to the customer each month.

6

7 Q. IN A NUMBER OF PLACES IN MR. RAMOS' DIRECT TESTIMONY,
8 STATEMENTS ARE MADE THAT BELL SOUTH'S BILLING OUTPUTS
9 DO NOT SUPPLY BILLING ADDRESSES FOR SUPRA'S OWN END
10 USERS. THE TESTIMONY GOES SO FAR AS TO STATE THAT
11 SUPRA'S BILLING ADDRESS IS USED INSTEAD OF THE END
12 USER'S. DOES THIS USE OF BILLING ADDRESSES SURPRISE
13 YOU AT ALL?

14

15 A. Of course not. As Supra begins serving the end user via the local
16 resale provisions of its BellSouth contract, Supra becomes the billed
17 party for all facilities and services ordered from BellSouth. BellSouth no
18 longer has responsibility for where the end user wants his bill sent.
19 BellSouth's concern is serving Supra as the customer of record.
20 Therefore, the billing address that is of importance to BellSouth is that
21 of Supra. The responsibility for billing the end user customers shifts
22 from BellSouth to Supra. As such, Supra's records and systems should
23 track where the end user wants to be billed. BellSouth has no more
24 responsibility for or interest in keeping billing information about Supra's
25 end users than Supra does in keeping information about BellSouth's

1 end users. That duty is for Supra to perform, not BellSouth. The
2 manner in which address information is provided to Supra on its DAB is
3 identical to the way the same information is provided to BellSouth's
4 retail DAB users.

5

6 Q. MR. RAMOS, ON PAGE 18 OF HIS DIRECT TESTIMONY, CLAIMS
7 THAT THE DAB CAPABILITIES PROVIDED TO AN ALEC ARE
8 SOMEHOW INFERIOR TO BILLING SERVICES THAT BELL SOUTH
9 PROVIDES TO "REGULAR RESIDENTIAL CUSTOMERS". DO YOU
10 AGREE WITH THIS?

11

12 A. No. Mr. Ramos uses bulk-billed items such as E-911 as examples of
13 charges billed at a more detailed level to residential customers than to
14 ALECs via DAB. This simply is not true. These charges are billed at
15 identical levels of detail for all customers. If they are billed at a certain
16 level of detail for residence customers, then they are at the same level
17 of detail for ALEC customers. I will point out, however, that DAB
18 provides for non-rated usage information for certain types of these
19 charges at a more detailed level than that displayed on the bill. For
20 example, directory assistance charges are generally bulk-billed at the
21 customer's billing number level. However, there are records within the
22 DAB files which provide information for directory assistance usage at a
23 line number level. So, if anything, the capabilities being made available
24 to ALECs provide for more detail than is usually available to residential
25 customers.

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Q. IS THERE ANY BASIS, THEN, IN THE STATEMENT THAT BELL SOUTH DOES NOT PROVIDE ADEQUATE BILLING DATA TO SUPRA PURSUANT TO ITS AGREEMENTS?

A. No. BellSouth provides billing information that allows the ALEC to substantiate the charges it is being billed by BellSouth and to identify which ALEC account is being charged. Section VII.K of BellSouth's resale agreement with Supra specifically states that BellSouth will not provide end user billing and collection services. Supra, as the provider of local service to the end user, could use the billing information provided via CLUB, DAB and other billing options provided to it, in combination with additional data that it would maintain about its own end users, to perform end user billing functions.

Q. MR. RAMOS GOES ON AT GREAT LENGTH IN HIS TESTIMONY ABOUT THE SERVICE ADDRESSES THAT ARE PROVIDED FOR EACH END USER ON A DAB. IS THE SERVICE ADDRESS GENERALLY CONSIDERED BILLING INFORMATION?

A. No. However, DAB provides customers, whether retail users of DAB or ALECs, with a partial service address associated with customer facilities for certain report options. The "DAB User's Guide" and "Beyond DAB" documents provide the specifications and instructions as to how to access each of the report options. After reading these

1 documents, a DAB user can quickly become familiar with the
2 information provided with each report option.

3

4 Q. MR. RAMOS INDICATES THAT SUPRA CAN ONLY HAVE THE
5 SERVICE ADDRESS ON ONE OF TEN REPORT FORMATS. IS THIS
6 TRUE?

7

8 A. Generally, yes. The DAB specifications allow for an option that will
9 print information for each account which includes service addresses.
10 As I have stated earlier, the address is not included on every report
11 option.

12

13 Q. ON PAGES 17 AND 19 OF HIS DIRECT TESTIMONY, MR. RAMOS
14 STATES THAT THE SERVICE ADDRESS ON DAB OUTPUT MEDIA
15 IS SOMEHOW ENCRYPTED AS BINARY DATA SO THAT AN ALEC
16 CAN NOT USE IT. IS THERE ANY TRUTH TO ANY OF THIS
17 ALLEGATION?

18

19 A. Not at all. Supra can easily create a spreadsheet, including service
20 addresses, using, as input, the DAB bill created for Supra. The
21 instructions contained in the "Beyond DAB" document can be used to
22 import the information to the spreadsheet application. I will add that a
23 copy of this same "Beyond DAB" document was provided to Supra in
24 August, 1997. If Supra were to take the time to perform the tasks as
25 documented, it would find that the service address is available in

1 usable, ASCII, comma-delimited data format as per the specifications
2 in the DAB documents.

3

4 Q. MR. RAMOS ALSO ALLEGES, ON PAGES 19 AND 20 OF HIS
5 DIRECT TESTIMONY, THAT BELLSOUTH IS RETAINING END USER
6 BILLING ADDRESS INFORMATION AND KEEPING THAT
7 INFORMATION "HIDDEN" FROM SUPRA. WHAT IS YOUR
8 RESPONSE TO THIS?

9

10 A. When a customer leaves BellSouth to be served by an ALEC, such as
11 Supra, a service order is written and processed to effect this change in
12 the Customer Records Information System ("CRIS"). In an effort to
13 effect this change in as seamless a manner as possible, the process
14 has been streamlined to change only those data items that are
15 absolutely required. Since BellSouth no longer uses the billing address
16 of the end user, that data item need not change. Therefore, it is
17 retained. The ALEC has access to this data via the Customer Service
18 Record ("CSR") process. So, whether the ALEC is viewing the CSR in
19 the pre-ordering and ordering interfaces or whether the ALEC is
20 provided the CSR by paper means, that information is readily available.
21 The end user billing address is not needed to provide billing to Supra,
22 so, as I have stated earlier, it is not picked up in the billing system nor
23 provided on billing outputs. When a customer comes back to
24 BellSouth, the process is reversed. Since the billing address is still on
25 the CSR, it would be on the account that is established as BellSouth

1 resumes the responsibility of end user billing. I would point out that the
2 billing address is verified as the customer applies to BellSouth for
3 service since a number of changes may have occurred while the
4 customer was served by the ALEC.

5

6 Q. MR. RAMOS STATES THAT THE LEVEL OF SUPPORT THAT
7 SUPRA HAS RECEIVED FROM BELL SOUTH EMPLOYEES IN
8 WORKING THROUGH BILLING ISSUES HAS BEEN DEFICIENT.
9 WOULD YOU CARE TO COMMENT ON THIS STATEMENT?

10

11 A. Yes. I have reviewed with the support staff in the Customer Billing
12 Services group within BellSouth the actions taken in an attempt to
13 satisfy this customer. BellSouth has clearly demonstrated over the past
14 year a commitment to go above and beyond the call of duty in its
15 efforts. BellSouth employees have met with vendors that Supra was
16 negotiating with in an effort to explain, yet again, the specifications of
17 the various billing options. BellSouth employees have worked with a
18 number of different programming staffs employed by Supra to assist in
19 any way possible to answer the technical questions that they had for
20 the options being considered. Many times these questions were
21 connected with industry standards where the answers could have just
22 as easily been directly obtained from the industry documentation by
23 Supra's staff. If an answer was not readily available, then BellSouth
24 was, and still is, committed to quickly finding the answers. Toward the
25 end of 1997, BellSouth employees met on almost a daily basis with

1 Supra employees and vendors to iron out details and questions. It is
2 unclear at this point if anything will satisfy Supra short of providing
3 billing directly to Supra's end users which is contrary to the policies of
4 BellSouth at this time.

5

6 **Q. ON PAGE 42 OF HIS DIRECT TESTIMONY, MR. RAMOS STATES**
7 **THAT BELLSOUTH REFUSED TO CONSIDER ADJUSTMENTS FOR**
8 **BILLING DISPUTES WITH BELLSOUTH AND THAT MR. RAMOS**
9 **WAS TOLD BY A BELLSOUTH EMPLOYEE, MRS. CYNTHIA**
10 **ARRINGTON, THAT HE SHOULD REFER HIS COMPLAINT TO THE**
11 **FLORIDA PUBLIC SERVICE COMMISSION. IS THERE ANY TRUTH**
12 **TO THIS ALLEGATION?**

13

14 **A. No. The Local Carrier Service Center staff, including Mrs. Arrington,**
15 **investigated hundreds of line numbers that Supra claimed were being**
16 **billed inaccurately and provided Mr. Ramos with the results of that**
17 **detailed investigation. During the review, BellSouth could not find a**
18 **single instance in which Supra was being billed for lines being used by**
19 **BellSouth to serve end user customers. Mr. Ramos was told that since**
20 **Supra was serving its end users using those facilities, it would be**
21 **responsible for the billed charges and no adjustment was appropriate.**
22 **At no time did Mrs. Arrington suggest that Mr. Ramos should go to the**
23 **Florida Public Service Commission.**

24

25

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2

3 A. Yes.

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