

# ORIGINAL

1                   **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2                   **REBUTTAL TESTIMONY OF BRYAN GREEN**

3                   **ON BEHALF OF**

4                   **MCIMETRO ACCESS TRANSMISSION SERVICES, INC**

5                   **DOCKET NO. 980281-TP**

6                   **JUNE 29, 1998**

7

8   **Q.   PLEASE STATE YOUR NAME, ADDRESS AND TITLE.**

9   A.   My name is Bryan Green. My business address is 2520 Northwinds Parkway,  
10        Alpharetta, Georgia 30004. I am employed by MCI Telecommunications  
11        Corporation (MCI) in the Southern Financial Operations group as a Senior  
12        Manager.

13

14   **Q.   ARE YOU THE SAME BRYAN GREEN THAT FILED DIRECT**  
15        **TESTIMONY IN THIS DOCKET ON MAY 4, 1998?**

16   A.   Yes.

17

18   **Q.   WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

19   A.   The purpose of my rebuttal testimony is to respond to some of the statements  
20        made by BellSouth witnesses Stacy and Milner in their direct testimony filed on  
21        June 1, 1998. I will not attempt to respond to every allegation made by those  
22        witnesses because much of their testimony has been addressed adequately in my  
23        direct testimony.

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FT 50-RECORDS/REPORTING

1 **GENERAL CLAIM**

2 ***COUNT ONE: FAILURE TO PROVIDE OSS INFORMATION***

3 **Q. AT PAGES 3 AND 4 OF HIS TESTIMONY, MR. STACY DESCRIBES**  
4 **MATERIALS AND TRAINING THAT HAVE BEEN MADE**  
5 **AVAILABLE CONCERNING THE OSS BELLSOUTH PROVIDES TO**  
6 **ALECS. DOES THIS INFORMATION AND TRAINING ADDRESS**  
7 **MCIMETRO'S CONCERNS?**

8 **A.** No. MCI metro's claim is based on BellSouth's failure to provide information  
9 about its own OSS, not information about the OSS BellSouth provides to  
10 MCI metro. MCI metro brought its claim because it discovered during OSS  
11 presentations at Section 271 hearings in Florida and elsewhere that despite  
12 BellSouth's assertions that it was providing OSS parity, BellSouth's own OSS  
13 capabilities far exceeded the capabilities that BellSouth afforded to ALECs.  
14 BellSouth has rejected MCI metro's efforts to obtain detailed information about  
15 BellSouth's systems and databases that would permit MCI metro to make  
16 comparisons in a systematic way.

17  
18 **Q. HOW DO YOU RESPOND TO MR. STACY'S CONTENTION AT**  
19 **PAGE 5 OF HIS TESTIMONY THAT MCI HAS BEEN GIVEN**  
20 **OPPORTUNITIES TO LEARN ABOUT BELLSOUTH'S OSS?**

21 **A.** MCI has had the opportunity to cross-examine BellSouth about its OSS at 271  
22 hearings and related workshops, but such examination as a practical matter has  
23 been limited. Moreover, when (as in the recent Tennessee 271 proceeding),

1 MCI has requested the information that it seeks in Count One of this case,  
2 BellSouth has objected and refused to produce the information. To say the  
3 least, it is suspicious that BellSouth is willing to produce certain information  
4 about its OSS, but is not willing to produce even a simple list of the OSS  
5 systems and databases that it uses. BellSouth should not be allowed to produce  
6 information that it deems favorable and conceal information that it evidently  
7 considers to be damaging.

8

9 **CLAIMS RELATING TO PRE-ORDERING**

10 **Q. MR. STACY DESCRIBES CERTAIN CAPABILITIES OF A PRE-**  
11 **ORDERING INTERFACE CALLED EC-LITE. IS EC-LITE**  
12 **AVAILABLE TO MCIMETRO AS A PRACTICAL MATTER?**

13 **A.** No. EC-LITE was developed by BellSouth specifically for AT&T. I know of  
14 no other ALEC that is planning to build to the EC-LITE interface, which is not  
15 surprising because EC-LITE has been rejected as an industry standard by the  
16 Electronic Communication Interface Committee (ECIC). Implementing EC-  
17 LITE would take several months and cost millions of dollars. Such an  
18 investment would be unwise and impractical because EC-LITE is and is very  
19 likely to remain a nonstandard interface.

20

21 **Q. PLEASE DESCRIBE YOUR EFFORTS TO OBTAIN LENS**  
22 **TECHNICAL SPECIFICATIONS FROM BELLSOUTH.**

1     A.     Attempting to obtain up-to-date technical specifications from BellSouth has  
2            been a frustrating experience. I initially requested LENS technical  
3            specifications by letter to BellSouth dated May 16, 1997, a copy of which is  
4            attached to my testimony as Exhibit \_\_\_\_ (BG-17). I repeated my request by  
5            letters dated June 4 and June 26, 1997, copies of which are attached as Exhibits  
6            \_\_\_\_ (BG-18) and \_\_\_\_ (BG-19), respectively. By letter dated July 8, 1997,  
7            BellSouth enclosed out-of-date technical specifications that were of limited use  
8            to MCImetro. A copy of this letter is attached as Exhibit \_\_\_\_ (BG-20).  
9  
10           BellSouth subsequently sent technical specifications dated September 5, 1997  
11           that supported an earlier release of LENS. An MCImetro letter dated  
12           September 5, 1997 noting this fact and requesting the latest specifications is  
13           attached as Exhibit \_\_\_\_ (BG-21). By E-Mail dated November 7, 1997,  
14           BellSouth sent what appeared to be another set of LENS specifications; I  
15           responded by E-Mail dated November 13, 1997, noting that these specifications  
16           were identical to the specifications that were sent on September 5. A copy of  
17           this exchange of E-Mails is attached as Exhibit \_\_\_\_ (BG-22). In the November  
18           13, 1997 letter from Mark Feidler (attached to my direct testimony as Exhibit  
19           \_\_\_\_ (BG-10)), he states that BellSouth provided CGI specifications on  
20           November 7, 1997, but fails to acknowledge that these specifications were  
21           merely a duplicate of the out-of-date specifications from September 5, 1997.

22

1           BellSouth sent another set of specifications by E-mail dated December 15,  
2           1997. (See Exhibit \_\_\_ (WNS-15).) As I explained in my direct testimony,  
3           these specifications were deficient because they lacked a data dictionary and a  
4           record layout for the Customer Service Record (CSR).

5

6   **Q.   HAVE MCIMETRO AND BELLSOUTH BEEN ABLE TO RESOLVE**  
7           **MCIMETRO'S CONCERNS RELATING TO THE DATA**  
8           **DICTIONARY AND CSR RECORD LAYOUT?**

9   A.   No. As reflected in the correspondence attached to Mr. Stacy's testimony as  
10       Exhibits \_\_\_ (WNS-17) to \_\_\_ (WNS-22), BellSouth has not been willing to  
11       provide a data dictionary concerning CSRs or to provide a CSR record layout.  
12       As a result, MCI metro's ability to use the CGI-LENS interface as an interim  
13       means of obtaining CSR data has been delayed and impaired.

14

15   **Q.   MR. STACY CLAIMS AT PAGES 20-21 OF HIS TESTIMONY THAT**  
16       **BELLSOUTH HAS SHOWN THAT IT IS POSSIBLE TO USE THE CGI**  
17       **SPECIFICATION TO BUILD AN INTEGRATABLE INTERFACE.**  
18       **PLEASE COMMENT.**

19   A.   MCI learned about the prototype project commissioned by BellSouth when  
20       BellSouth testified about the project at the 271 hearing in Tennessee on May 7,  
21       1998. During cross-examination the following day, a number of significant  
22       points about the project were brought out. First, BellSouth's prototype is just  
23       that, a prototype that was developed for BellSouth to demonstrate that a CGI

1 interface could be developed using the CGI specifications. The prototype is not  
2 intended for commercial use. Second, CGI-LENS offers the same pre-ordering  
3 functionality as LENS and thus suffers from the same limitations as LENS.  
4 (For example, as in LENS, an ALEC only can reserve six telephone numbers at  
5 a time.) Third, the prototype was developed for new residential service orders  
6 only. CSR information is not required for such orders, and thus the Albion  
7 report attached to Mr. Stacy's testimony as Exhibit \_\_\_ (WNS-23) reflects that  
8 its software only permits ALECs to view CSR information and apparently not  
9 to use it in ordering. BellSouth thus still has not shown that its specifications  
10 are fully sufficient to obtain and process CSR information -- the one  
11 functionality that MCImetro has sought from CGI-LENS (on an interim basis).  
12 A fourth point also should be mentioned, which is that on the final page of the  
13 Albion report, five BellSouth contact numbers are listed. Although BellSouth  
14 has not provided any other information concerning the assistance that BellSouth  
15 provided to Albion during the project, I would not be surprised if Albion  
16 received more cooperation from BellSouth on its project than MCImetro did in  
17 attempting to obtain adequate CGI specifications.

18  
19 **Q. DOES MCIMETRO INTEND TO USE CGI-LENS IN THE INTERIM**  
20 **FOR PURPOSES OTHER THAN OBTAINING AND PROCESSING**  
21 **CSR INFORMATION?**

22 **A.** No, it would be impractical to do so. As noted in the Albion report, more than  
23 1000 man-hours and \$120,000 were required just to prepare a prototype

1 applicable only to new residential service orders. This project is certainly a  
2 tribute to BellSouth's tremendous financial resources, but it also demonstrates  
3 the great cost involved in attempting to develop a full-blown commercial  
4 application of CGI-LENS.

5

6 **Q. WHAT PRE-ORDERING INTERFACE DOES MCIMETRO INTEND**  
7 **TO USE?**

8 A. MCImetro intends to use an interface based on the EDI TCP/IP/SSL3 protocol.  
9 As I noted in my direct testimony, MCImetro has been requesting BellSouth to  
10 work with MCImetro to develop such an interface for about a year now, but  
11 until just recently BellSouth has refused to do so. But this month EDI  
12 TCP/IP/SSL3 was approved as an industry guideline and MCImetro  
13 understands that BellSouth now will begin to implement an interface based on  
14 that protocol with MCImetro. Because work will now begin on an interface  
15 based on industry standards, it would make even less sense for MCImetro to  
16 invest further resources in the CGI-LENS interface.

17

18 **Q. WOULD A CGI-LENS PRE-ORDERING INTERFACE PROVIDE**  
19 **PARITY WITH BELLSOUTH'S OSS?**

20 A. Absolutely not, for the reasons I discussed at page 10 of my direct testimony.  
21 Further, as the Georgia Public Service Commission recently concluded,  
22 "BellSouth's LENS-CGI presentation requires the use of an underlying Hyper  
23 Text markup Language ("HTML") presentation as part of the data delivery

1 mechanism, and this forces CLECs into a slower, less efficient integration than  
2 is available to BellSouth for its comparable retail operations.” In re  
3 Investigation into Development of Electronic Interfaces for BellSouth’s  
4 Operations Support Systems, Docket No. 8354-U, p. 9.

5

6 ***COUNT TWO: FAILURE TO PROVIDE A DOWNLOAD OF THE SAG DATA***

7 **Q. AT PAGE 12 OF HIS TESTIMONY, MR. STACY REFERS TO COST**  
8 **ESTIMATES PROVIDED TO MCIMETRO BY BELL SOUTH. DID**  
9 **MCIMETRO REQUEST THESE COST ESTIMATES?**

10 **A.** No. It has always been MCI metro’s position that the Interconnection  
11 Agreement requires BellSouth to provide a download of the Regional Street  
12 Address Guide (RSAG) at no additional cost. MCI metro has never submitted a  
13 bona fide request for such a download. I did receive an E-Mail, a copy of  
14 which appears to be attached to Mr. Stacy’s testimony as Exhibit \_\_\_ (WNS-8),  
15 in which BellSouth suggested that a “Business Opportunity Request” be  
16 submitted internally by the BellSouth account team. After receiving the E-Mail,  
17 I informed BellSouth that I did not object to BellSouth going through its  
18 internal procedures for processing MCI metro’s request for a download of the  
19 SAG data. But I did not state or imply that MCI metro had changed its position  
20 that no additional cost should be required.

21

22 **Q. MR. STACY STATES AT PAGE 13 OF HIS TESTIMONY THAT**  
23 **“BASED ON THE VOLUME OF DATA INVOLVED, IT IS**

1           **INCONCEIVABLE THAT BELL SOUTH WOULD EVER HAVE**  
2           **AGREED TO PROVIDE MCIMETRO OR ANY OTHER ALEC A**  
3           **DOWNLOAD OF RSAG DATA.” PLEASE COMMENT.**

4    A.    In the first place, the language of the contract is clear, as described in the  
5           testimony of Ronald Martinez. Second, my understanding is that AT&T’s  
6           interconnection agreements require BellSouth to provide a “download” of the  
7           RSAG, so BellSouth was willing to agree to such a contractual term (as it did  
8           with MCI metro using other language) and did not regard such a provision as  
9           “inconceivable.” Third, based on BellSouth testimony I saw in Georgia, it is my  
10          understanding that BellSouth downloaded the RSAG to a mainframe computer  
11          as part of volume testing it has conducted. In short, BellSouth’s “volume”  
12          argument fails to hold water.

13

14    ***COUNT THREE: FAILURE TO PROVIDE PARITY IN DUE DATE***

15    ***INTERVALS***

16    **Q.    DOES BELL SOUTH DEMONSTRATE THAT IT PROVIDES PARITY**  
17           **WITH RESPECT TO DUE DATES?**

18    A.    No. BellSouth does not dispute that it has no method of calculating due dates  
19           for unbundled network element (UNE) orders. Further, Mr. Stacy  
20           acknowledges that in the inquiry mode of LENS, the customer service  
21           representative must perform a manual due date calculation. (Stacy Dir. Test.,  
22           p. 17.) This requirement is discriminatory. I note that the same problem exists  
23           in CGI-LENS, as reflected in the Albion report attached to Mr. Stacy’s

1 testimony. (See Exhibit \_\_\_\_, WNS-23, p.8.) Mr. Stacy's suggestion that  
2 ALECs do their own programming to calculate due dates based on information  
3 provided in the inquiry mode of LENS is unacceptable because, even assuming  
4 such programming could be successfully undertaken, it is unreasonable to  
5 expect ALECs to make such an investment in a proprietary and inadequate pre-  
6 ordering system. Further, Mr. Stacy ignores the Commission's directive in the  
7 271 proceedings in Docket No. 960786-TL (271 Order) that BellSouth fix this  
8 problem. See 271 Order, pp. 82-83, 157-58.

9  
10 ***COUNT FOUR: FAILURE TO PROVIDE PARITY IN ACCESS TO***

11 ***TELEPHONE NUMBERS AND TELEPHONE NUMBER INFORMATION***

12 **Q. DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY**  
13 **WITH RESPECT TO TELEPHONE NUMBER RESERVATION?**

14 **A.** No. At page 24 of his testimony, Mr. Stacy acknowledges that BellSouth's  
15 customer service representatives using RNS or DOE may reserve up to twenty-  
16 five telephone numbers, while ALEC customer service representatives using  
17 LENS only may reserve six. This same limitation exists in LENS when  
18 enhanced by CGI. ALECs' ability to reserve successive batches of six  
19 telephone numbers does not remedy the disparity -- an ALEC customer service  
20 representative would have to have to go back to the number reservation screen  
21 five times to order twenty-five numbers and the delay involved would be  
22 compounded if the ALEC wanted the numbers in sequence.

23

1 **Q. PLEASE RESPOND TO MR. STACY'S TESTIMONY AT PAGE 26**  
2 **CONCERNING THE ABILITY TO VIEW AVAILABLE NXX CODES.**

3 A. Mr. Stacy appears to acknowledge that, as MCImetro has alleged, BellSouth  
4 customer service representatives have access to available NXX codes through  
5 BellSouth's OSS, while ALECs do not have such access through LENS. Mr.  
6 Stacy provides no justification for this disparity. Mr. Stacy's statement that  
7 ALECs should incorporate the LERG into their own systems ignores the fact  
8 that the LERG is massive and incorporating it into ALEC's OSS systems for  
9 on-line access would not be a practical undertaking. In the final analysis,  
10 BellSouth simply refuses to heed the Commission's 271 Order in which it  
11 directed BellSouth to correct deficiencies such as this one. See 271 Order, pp.  
12 82-83, 157-58.

13  
14 **Q. PLEASE RESPOND TO MR. STACY'S TESTIMONY AT PAGES 26**  
15 **AND 27 CONCERNING PRE-SELECTED TELEPHONE NUMBERS.**

16 A. Again, BellSouth does not dispute that its customer service representatives  
17 using RNS have access to pre-selected telephone numbers, whereas ALEC  
18 customer service representatives using LENS do not. The Commission in its  
19 271 Order directed BellSouth to correct this deficiency. See 271 Order, pp. 82-  
20 83, 157-58. BellSouth's only response is that ALECs could develop a similar  
21 functionality if they chose. (Stacy Dir. Test., pp. 26-27.) This response does  
22 not comply with the Commission's directive.

23

1    ***COUNT FIVE: FAILURE TO PROVIDE PARITY IN ACCESS TO USOC***  
2    ***INFORMATION***

3    **Q.    HAVE ANY DEVELOPMENTS TAKEN PLACE CONCERNING**  
4    **USOCS SINCE YOU FILED YOUR DIRECT TESTIMONY?**

5    A.    Yes.  Since my direct testimony was filed, BellSouth has provided USOCs in a  
6    spaced value format that enables MCImetro to download USOCs into a  
7    database, so that issue appears to be resolved.  The remaining issue is the  
8    problem of having to reference the LEO Guide or the SOER edits to obtain  
9    field identifiers and to determine the states in which a USOC is valid.  This  
10   problem still has not been addressed.  In particular, MCImetro still requires a  
11   FID file with descriptions that would enable MCImetro's CSR server project to  
12   present CSRs in English without unnecessary guesswork.

13

14   ***COUNT SIX: FAILURE TO PROVIDE CUSOMER SERVICE RECORD***  
15   ***INFORMATION***

16   **Q.    DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY**  
17   **WITH RESPECT TO THE PROVISION OF CSR DATA?**

18   A.    No.  At pages 31 and 32 of his testimony, Mr. Stacy acknowledges that  
19   BellSouth provides CSR data based on its determination of what ALECs need  
20   to provision telephone service and limits the number of pages that ALECs may  
21   obtain electronically through LENS.  Further, at pages 33-35, Mr. Stacy  
22   acknowledges that BellSouth does not currently provide pricing information or  
23   a local service itemization.

1

2 **Q. AT PAGE 32 OF HIS TESTIMONY, MR. STACY STATES THAT**  
3 **BELLSOUTH PROHIBITS ALECS FROM ACCESS TO CSR**  
4 **INFORMATION WHEN CUSTOMERS REQUEST THAT THEIR**  
5 **ACCOUNT INFORMATION BE RESTRICTED. PLEASE COMMENT.**

6 A. BellSouth's practice of prohibiting ALECs from access to "restricted" CSRs,  
7 even after MCImetro has obtained the customer's express permission to obtain  
8 access, is improper and discriminatory. BellSouth refuses to permit access to  
9 such CSRs until after it has spoken to the customer, even if MCImetro faxes a  
10 copy of the letter of authorization. BellSouth has taken seven to thirty days to  
11 lift the restriction on CSR data after MCImetro has made an authorized request  
12 for it.

13

14 **Q. PLEASE RESPOND TO MR. STACY'S ARGUMENT AT PAGES 33-34**  
15 **OF HIS TESTIMONY THAT BELLSOUTH SHOULD BE ABLE TO**  
16 **STRIP OFF PRICING INFORMATION FROM THE CSRS IT**  
17 **PROVIDES TO ALECS.**

18 A. BellSouth should not be permitted to strip off pricing information before  
19 providing CSRs to ALECs. As Mr. Stacy acknowledges, this pricing  
20 information is not proprietary, and indeed is based on tariffed rates that are  
21 public and nonproprietary. The only reason for excluding this information is to  
22 have ALECs derive the same information from other sources, making their pre-  
23 ordering processes more expensive and time-consuming. ALECs will benefit

1 from having this information readily accessible and thus will be better able to  
2 compete with BellSouth. That is why BellSouth seeks to exclude this  
3 information and also why BellSouth should be prevented from doing so. I  
4 further note that in its OSS Order at pages 10-11, the Georgia Public Service  
5 Commission rejected similar arguments by BellSouth and required BellSouth to  
6 include pricing information in the CSRs provided to ALECs.

7

8

### **ORDERING AND PROVISIONING CLAIMS**

9

#### ***COUNT SEVEN: FAILURE TO PROVIDE PARITY IN SERVICE JEOPARDY***

10

#### ***NOTIFICATION***

11

**Q. DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY  
12 WITH RESPECT TO SERVICE JEOPARDY NOTIFICATION?**

13

**A. No. As Mr. Stacy acknowledges, when BellSouth realizes that it will not be  
14 able to complete an order for workload reasons on the day of the appointment,  
15 its work management center calls its customers. For MCI metro customers,  
16 BellSouth calls MCI metro, which in turn calls its customers. (Stacy Dir. Test.,  
17 pp. 37-39.) The notification process for MCI metro thus involves an additional  
18 manual step. Otherwise, in the interim MCI metro has agreed to receive service  
19 jeopardy notifications via E-Mail, but this interim process is inferior to what  
20 BellSouth provides itself. BellSouth should be required to provide service  
21 jeopardies via EDI as MCI metro has requested.**

22

1 Q. DO YOU AGREE THAT MCIMETRO SHOULD BE REQUIRED TO  
2 SUBMIT A BFR TO OBTAIN SERVICE JEOPARDY NOTIFICATIONS  
3 VIA EDI?

4 A. No. As described in the direct testimony of Ronald Martinez, the  
5 Interconnection Agreement requires BellSouth to provide service jeopardy  
6 notification at parity with what it provides to itself. A BFR should not be  
7 required for BellSouth to meet this obligation.

8

9 Q. HOW DO YOU RESPOND TO MR. STACY'S ASSERTION AT PAGE  
10 38 OF HIS TESTIMONY THAT MCIMETRO HAS NOT YET  
11 IMPLEMENTED EDI?

12 A. MCImetro is currently in the process of testing EDI in preparation for  
13 implementation. Obviously, it will take some time to incorporate a service  
14 jeopardy notification function into the EDI interface, so now is the time to do  
15 so. Waiting until after the EDI interface has been implemented only will result  
16 in unnecessary delay.

17

18 ***COUNT EIGHT: FAILURE TO PROVIDE FOCs IN COMPLIANCE WITH THE***  
19 ***INTERCONNECTION AGREEMENT***

1 **Q. PLEASE RESPOND TO MR. MILNER'S CONTENTION, AT PAGE 4**  
2 **OF HIS TESTIMONY, THAT MCIMETRO COULD HAVE ORDERED**  
3 **A SERVICE COMPARABLE TO OFF-NET T1S UNDER THE**  
4 **INTERCONNECTION AGREEMENT.**

5 A. MCI metro should have been able to order a comparable service and indeed  
6 attempted to do so. As noted in a letter from Walter Schmidt to Pam Lee dated  
7 June 1, 1998, on November 10, 1997, MCI metro requested BellSouth to  
8 provide off-net T1 combinations under the Interconnection Agreement. The  
9 letter further notes that BellSouth refused to provide these combinations. A  
10 copy of the letter is attached to my testimony as Exhibit \_\_\_ (BG-23). Thus,  
11 BellSouth is attempting to rely on its own breach of contract to circumvent the  
12 performance standards of the Interconnection Agreement.

13

14 **Q. IS THERE ANY OTHER REASON THAT BELLSOUTH IS REQUIRED**  
15 **TO COMPLY WITH THE PERFORMANCE STANDARDS OF THE**  
16 **INTERCONNECTION AGREEMENT?**

17 A. Yes. For the reasons described in the direct testimony of Ronald Martinez,  
18 BellSouth should be required to meet the performance standards of the  
19 Interconnection Agreement for access service requests submitted for the  
20 purpose of providing local service.

21

22 **Q. IF THE INTERCONNECTION AGREEMENT WERE FOUND NOT TO**  
23 **APPLY, TO WHAT STANDARD SHOULD BELLSOUTH BE HELD?**

1 A. As noted in Andri Weathersby's letter to Sharon Daniels dated November 5,  
2 1997, MCImetro understood from its discussions with BellSouth that BellSouth  
3 would provide FOCs for access circuits within forty-eight hours (which is the  
4 standard in the industry). BellSouth responded by letter dated December 15,  
5 1997 in which it did not dispute this understanding. A copy of the November 5  
6 and December 15 letters are attached as Exhibits \_\_\_ (BG-24) and \_\_\_ (BG-  
7 25), respectively. So even if the standard for access service requests were  
8 applied, BellSouth's FOC performance would fall far short of what is required.  
9

10 **Q. DOES BELLSOUTH'S FOC PERFORMANCE MEET THE**  
11 **REQUIREMENTS OF NONDISCRIMINATORY ACCESS TO OSS**  
12 **AND PROVIDE MCIMETRO A MEANINGFUL OPPORTUNITY TO**  
13 **COMPETE UNDER THE TELECOMMUNICATIONS ACT OF 1996?**

14 A. No.

15

16 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

17 A. Yes, it does at this time.  
18  
19  
20  
21  
22  
23

May 16, 1997

Ms. Ilene Barnett  
BellSouth  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084

Ilene,

I have recently had an opportunity to review the LENS material BST provided MCI on 5/12/97. While going through the material, I noticed that the USER guide was the only documentation provided. Two vital pieces of information are still missing: documentation on how to connect to LENS (i.e. the steps necessary and the forms required to physically gain connectivity to LENS) and the technical specifications that would allow MCI to build an interface to LENS.

These documents are necessary for MCI to complete its assessment of LENS. Please provide me with an idea of when I can expect to receive these documents.

I will follow this email up with a letter addressed to you.

Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515



780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

Exhibit BG-18  
MCI: Green  
Docket NO. 980281-TP

June 4, 1997

Ms. Ilene Barnett  
BellSouth  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084

Ilene,

I recently received a certified letter from you stating that MCI was working with BST to pursue the technical specifications that would allow MCI to build an interface to LENS. Per our conversation this afternoon, this is not correct. The discussions underway between MCI and BST are to facilitate the provisioning of connection between our gateways to allow MCI to access LENS via our LAN.

Since writing the original request on May 16, 1997, I have not received a response or any status on the availability of the documentation. Again, the longer the delay on receiving this information the greater the impact on our ability to develop the interfaces in a timely manner.

We are awaiting your response on this matter.

A handwritten signature in black ink, appearing to read "Bryan Green".

Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515



**MCI Telecommunications  
Corporation**

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

Exhibit BG-19  
MCI: Green  
Docket No. 980281-TP

June 26, 1997

Ms. Ilene Barnett  
BellSouth Interconnection  
1960 West Exchange Place Ste. 420  
Tucker, GA 30084

Ilene,

This letter is to request status of the LENS technical specifications that MCI requested in writing on May 16, 1997.

Based on the lack of response from BST on this issue, we will assume that the technical specifications are not available. The lack of technical specifications has caused MCI significant delay with respect to interface development.

Please provide status on the LENS technical specifications by Wednesday, July 2, 1997. Your prompt response to this matter will be greatly appreciated.

Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515

cc: Pam Lee  
Marcel Henry  
Georjean Simmons

Leid  
7/5/97



BellSouth Interconnection Services

Memorandum

Exhibit BG-20  
MCI: Green  
Docket No 980281-TP

**File Code**  
**Date** July 8, 1997

**To** Bryan Green  
**Telephone number** 404-267-5515  
**Fax number**

**From** Ilene Barnett  
**Telephone number** 770-492-7525  
**Fax number**

**Subject** LENS Access Technical Specification

Enclosed is the document you requested beginning on May 16, 1997. This document was provided to me with the caveat that it had not been updated to match the current LENS application. I will work with Linda Tate to provide you an updated copy as soon as it is available.

I apologize for the length of time in responding to your request. Please don't hesitate to call me if you have additional questions or would like to have more discussions on this subject.

cc: Linda Tate (w/o attachment)  
Don Stewart (w/o attachment)



**MCI Telecommunications  
Corporation**

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

Exhibit BG-21  
MCI: Green  
Docket No. 980281-TP

September 5, 1997

Mr. Cliff Bowers, Sales Director  
BellSouth Telecommunications  
1960 West Exchange Place, Ste. 420  
Tucker, GA 30084

Cliff,

Per the LENS Access Technical Specification, the LENS application can be accessed directly by other computer systems. Based on that fact, MCI would like to meet with BellSouth and develop the interface that would provide us with that access. The specifications we have are dated 9/5 and per the documentation it supports the 4/22/97 release of LENS. In order to develop this interface we need the latest technical specification which includes all the LENS upgrades (eg csr). We'd like an updated copy to review prior to the meeting.

We will be available to meet via conference call on September 15, 17, or 18. Please let me know which date is best for you and your technical SME. You may direct your questions to me on 404-267-6593.

Sincerely,

Anna Hopkins

Local Systems Implementation Specialist

Date: Thu Nov 13, 1997 02:47 pm EST  
Source-Date: Thu, 13 Nov 1997 14:43:40 -0500  
From: "Bryan.Green@mci.com"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Bryan.Green@mci.com

TO: "'Clifford.H.Bowers'"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Clifford.H.Bowers@bridge.bellsouth.com

CC: "Pamela.Lee"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Pamela.Lee@bridge.bellsouth.com

CC: "Judy.Rueblinger1"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Judy.Rueblinger1@bridge.bellsouth.com

CC: "Bob.Siegel"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Bob.Siegel@bridge.bellsouth.com

CC: "'Alan Anglyn [Alan.Anglyn@MCI.Com] [E-mail]"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Alan.Anglyn@mci.com

CC: "'Anna Hopkins [Anna.Hopkins@MCI.Com] [E-mail]"  
EMS: INNERMAIL / MCI ID: 208-7612  
MBX: Anna.Hopkins@mci.com

BCC: \* Ron Martinez / MCI ID: 357-0919

Subject: RE: CGI  
Message-Id: 97111319470933/INTERNETGWDI1IG  
Source-Msg-Id: <01BCF042.89552E20.Bryan.Green@mci.com>  
U-Organization: MCI

Cliff,

After reviewing the attached CGI specifications, we have determined that they are the same specifications that we received on 9/5/97. Your note mentions that release 1.1 will be available in the next four weeks or so. In order for our developers to evaluate the specs as quickly as possible, we would need a more accurate availability date as well as a list of the enhancements release 1.1 will support.

Please let me know if you will be able to provide me with the requested information by 11/20/97. If you are unable to meet this date, please let me know when I can expect to receive.

Bryan

-----Original Message-----

From: Clifford.H.Bowers [SMTP:Clifford.H.Bowers@bridge.bellsouth.com]  
Sent: Friday, November 07, 1997 5:24 PM  
To: Bryan Green  
Cc: Pamela.Lee; Judy.Rueblinger1; Bob.Siegel  
Subject: CGI

<< Message: CGI >> Bryan,

Attached are the release 1.0 CGI specifications. These should give your folks

something they can begin working with. Also notice that Bob should have release 1.1 specifications in around four weeks.

Thanks,

Cliff

**MCI Telecommunications  
Corporation**

Two Northwinds Center  
2520 Northwinds Parkway  
Alpharetta, GA 30004

Exhibit BG-23  
MCI: Green  
Docket No. 980281-TP  
Page 1 of 2

June 1, 1998

Ms. Pam Lee  
Sales Assistant Vice President, MCI Account Team  
BellSouth Interconnection Services  
1960 W. Exchange Place  
Suite 420  
Tucker, Georgia 30084

Re: Notice that MCI<sub>m</sub> will be ordering Interconnection T-1s pursuant to the  
MCI<sub>m</sub>/BellSouth Interconnection Agreement and demand for credit.

Dear Ms. Lee:

As you know, on November 10, 1997, MCI<sub>m</sub> requested that BellSouth provide to MCI<sub>m</sub> combinations of unbundled network elements (UNEs) generally consisting of the following elements: 4-wire DS-1 local loop and DS-1 dedicated transport per mile and per termination. For convenience purposes, I will refer to such combinations as Interconnection T-1s. MCI<sub>m</sub> made this request pursuant to the provisions of the MCI<sub>m</sub>/BellSouth Interconnection Agreement which require BellSouth to provide to MCI<sub>m</sub> UNE combinations at UNE rates. Despite the plain language contained in the Agreement, BellSouth refused to provide these UNE combinations to MCI<sub>m</sub>. Because MCI<sub>m</sub> had no other way to order these loops, and thus serve our customers, MCI<sub>m</sub> had to resort to ordering T-1s from BellSouth's Interstate Access Tariff.

As you may be aware, the Florida Public Service Commission has recently affirmed MCI<sub>m</sub>'s interpretation of the Agreement on this point, i.e., BellSouth is under an obligation to provide UNE combinations to MCI<sub>m</sub> at the sum of the stand alone UNE rates contained in the Agreement. See FPSC Docket No. 971140-TP. Indeed, the Commission ruled that the rates for combinations could be less than the sum of the rates of the component elements since duplicate charges and charges for services not needed should be removed from the combination rates.

Based on the above, this is to officially notify BellSouth that MCI<sub>m</sub> will be migrating our local T-1s currently ordered from the Interstate Access Tariff to UNE combinations from the Florida Interconnection Agreement. Further, BellSouth should treat all T-1 orders currently being processed as requests for Interconnection T-1s at the interconnection rates. BellSouth should also convert the billing of the existing T-

June 1, 1998

1s from the access rate to the Florida interconnection rates. Finally, MCI is requesting credits for all T-1s ordered from November 10, 1997 to the present. This credit will be the difference between the pricing of the T-1 access rate and the price of the component UNEs at the interconnection prices. (e.g. During this time period, the recurring rates for DS-1 local loops was \$80.00 per month. For DS-1 Dedicated Transport it was \$1.60 per mile and \$59.75 per termination.)

MCI would like to schedule a meeting to discuss in more detail the processes involved in migrating the existing T-1s to UNEs and ordering Interconnection T-1s in the future. MCI requests this meeting no later than June 10, 1998.

If you have any questions regarding MCI's position on this matter please give me a call to discuss. I can be reached at (770) 625-6849.

Sincerely,



Walter J. Schmidt  
Senior Manager  
Southern Financial Operations – Carrier Agreements

cc: Ilene Barnett  
Charlene Keys  
Daren Moore  
Daniel Fry  
Andri Weathersby  
Vernon Starr



**MCI Telecommunications  
Corporation**

780 Johnson Ferry Road  
Atlanta, GA 30342  
404 267 5500

Exhibit BG-24  
MCI: Green  
Docket No. 980281-TP  
Page 1 of 2

Sharon Daniels  
Sales Director  
BellSouth  
Interconnection Services  
Suite 420  
1960 W. Exchange Place  
Tucker, GA 30084

November 5, 1997

Dear Sharon:

There are two outstanding issues that MCI wants escalated to the executive level within BellSouth. These two issues seriously impact MCI's ability to successfully enter and compete in the local market. Although, these two issues have been discussed in several meetings between MCI and BellSouth, they have not yet been resolved. Therefore, MCI needs BellSouth to expeditiously bring these issues to closure.

**1. Loss of Dial Tone:** MCI customers continue to experience loss of dial tone after transitioning to MCI local service. MCI's resale product customers have reported these incidents of loss of dial tone. As we understand, BellSouth is in a trial mode for implementing a new process that should eliminate the probability of MCI's customers from losing dial tone. The new BellSouth process will be to make billing changes only and eliminate the present install/disconnect process. Please refer to Attachment VIII, Section 2.2.2.2 in the Interconnection Agreement concerning loss dial tone.

MCI has made several requests to BellSouth on the progress of the trial and a specific date for implementation of the new process. To date MCI has not received a satisfactory response and request this issue is escalated to within BellSouth. The escalation response should include statistical data from the trial so MCI can set our expectations and a specific implementation and date for the new process.

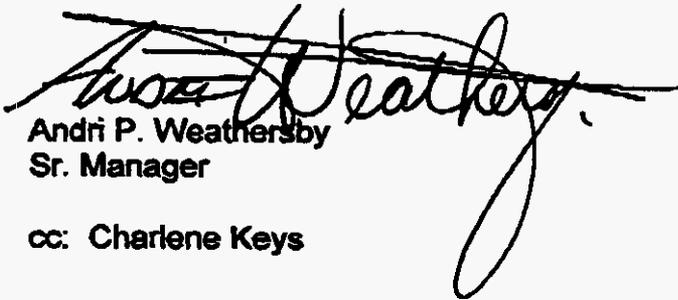
**2. FOCs:** Per the last discussion between MCI and BellSouth, MCI understands that FOCs for access circuits will be received within forty-eight (48) hours. For these received FOCs, BellSouth will perform the necessary engineering specs for facilities, which will eliminate missing installation dates for "no facilities". However, BellSouth will not commit to the same performance standards for local service. MCI understands that FOCs for local service will be received within twenty-four (24) hours however, BellSouth may not have done the necessary provisioning check for facility availability. This solution is inadequate because it will result in BellSouth missing installation dates

because of "no facilities," such a result would seriously jeopardize MCI's relationship with our customers.

MCI is requesting this issue also be escalated within BellSouth. The escalation response should include process definition and action plan for ensuring FOCs are facility checked and also lowering FOCs intervals for access circuits.

Please review the above two (2) issues and provide MCI with a response by COB 11/17/97.

Sincerely,



Andri P. Weathersby  
Sr. Manager

cc: Charlene Keys

---

**BellSouth Interconnection Services**

1960 West Exchange Place

Suite 420

Tucker, Georgia 30084

Exhibit BG-25

MCI: Green

Docket No. 980281-TP

Page 1 of 2

(770) 428-7540

Fax: (770) 496-1898

December 15, 1997

Andri Weathersby  
Sr. Manager  
MCI Telecommunications  
780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

Dear Andri:

This is in response to your letter dated November 5, 1997, requesting that two outstanding issues, "loss of dial tone" and Firm Order Confirmations (FOCs) be escalated for resolution. We have escalated these issues to our Real Time Resolution Group and have the following status.

**Loss of Dial Tone:** It is BellSouth's understanding that MCI is referring to resale customers that have lost dial tone as a result of BellSouth's process of issuing New (N) orders and Disconnect (D) orders on "Migrate as Is" and "Migrate with Change" requests. BellSouth uses both a disconnected service order and a reconnect service order to transfer end user service to a CLEC. Both orders are necessary based upon existing billing system requirements for disconnecting the existing account and rendering a final bill. BellSouth has devoted considerable resources and incurred substantial expense in developing new systems that obviate the need for a disconnect service order for many types of resale orders. Currently being tested in the production environment, BellSouth anticipates that such systems will be implemented for most CLECs, including MCI, during the first quarter of 1998.

**FOCs:** The BellSouth Ordering Guide for CLECs states "The FOC does not constitute, and is not a guarantee that facilities are available. The committed due date is based on an assumption that facilities are available. If there is a post FOC facility problem, the CLEC will be informed of the estimated service date." This policy is the same for BellSouth customers. MCI is correct in its understanding that a tariff was filed that provides a Pending Order Confirmation that acknowledges receipt of an Access Service Order and a Firm Order Confirmation that is released after verifying facility availability. Transmittal No. 424 for FCC Tariff No. 1, Access Service, was filed with the FCC on September 29, 1997 with an effective date of October 14, 1997. As I have indicated to you, there are currently no plans to implement a similar process in the local service arena.

Please call me if you have questions or want to discuss further.

Sincerely,

A handwritten signature in cursive script that reads "Sharon R. Daniels".

Sharon R. Daniels  
Sales Director