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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF JERRY HENDRIX
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP

June 29, 1998

Q. PLEASE STATE YOUR NAME, COMPANY NAME, AND ADDRESS.

A. My name is Jerry Hendrix. I am employed by BellSouth
Telecommunications, Inc. as Director - Interconnection Services
Pricing. My business address is 675 West Peachtree Street, Atlanta,
Georgia 30375.

Q. ARE YOU THE SAME JERRY HENDRIX WHO FILED DIRECT
TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut testimony filed in this docket
by MCI metro Access Transmission Services, Inc. (hereinafter referred
to as "MCI") witnesses, Ronald Martinez and Bryan Green.
Specifically, I will address Issues 5, 11, and 12.

1 **Issue No. 5**

2 **HAS BELLSOUTH PROVIDED MCIMETRO WITH ACCESS TO**
3 **UNIVERSAL SERVICE ORDER CODES (USOCs) IN COMPLIANCE**
4 **WITH THE TELECOMMUNICATIONS ACT OF 1996 AND THE**
5 **PARTIES' INTERCONNECTION AGREEMENT? IF NO, WHAT**
6 **ACTION, IF ANY, SHOULD THE COMMISSION TAKE?**

7

8 Q. AT PAGES 12 AND 13 OF MR. MARTINEZ'S TESTIMONY HE
9 ALLEGES THAT BELLSOUTH HAS A RESPONSIBILITY UNDER THE
10 INTERCONNECTION AGREEMENT TO PROVIDE USOC
11 INFORMATION. DO YOU AGREE?

12

13 A. No. Universal (or Uniform) Service Order Codes (USOCs) are not
14 discussed in the Interconnection Agreement between the parties.
15 Thus, there is no obligation to provide USOCs to MCI. Although
16 BellSouth is not required to provide USOCs, BellSouth witness, William
17 Stacy, explains in his testimony how USOCs can be accessed and
18 downloaded for MCI's use.

19

20

21 **Issue No. 11**

22 **HAS BELLSOUTH PROVIDED MCIMETRO WITH RECORDED**
23 **USAGE DATA IN COMPLIANCE WITH THE**
24 **TELECOMMUNICATIONS ACT OF 1996 AND THE PARTIES'**

25

1 INTERCONNECTION AGREEMENT? IF NO, WHAT ACTION, IF
2 ANY, SHOULD THE COMMISSION TAKE?

3

4 Q. AT PAGE 20, LINES 9 AND 10, MR. MARTINEZ STATES THAT
5 BELLSOUTH IS REQUIRED TO PROVIDE FLAT-RATE USAGE DATA
6 WHEN MCIM REQUESTS IT. DO YOU AGREE?

7

8 A. No.

9

10 Q. WHAT PROVISIONS DOES THE AGREEMENT MAKE IN
11 REFERENCE TO FLAT-RATE USAGE DATA?

12

13 A. None. In Attachment VIII, Section 4, Provision of Subscriber Usage
14 Data (Exhibit JDH-14), the agreement states "BellSouth shall comply
15 with BellSouth EMR industry standards in delivering customer usage
16 data to MCIm" (4.1.1.1), and "BellSouth shall provide MCIm with
17 unrated EMR records associated with all billable intraLATA toll and
18 local usage which they record on lines purchased by MCIm for resale"
19 (4.2.1.1).

20

21 Q. HAS BELLSOUTH PROVIDED MCIM WITH RECORDED USAGE
22 DATA IN COMPLIANCE WITH THE PARTIES' INTERCONNECTION
23 AGREEMENT?

24

25

1 A. Yes. BellSouth has provided all billable messages which they record
2 on MCI's customer lines via the Optional Daily Usage File (ODUF) as
3 required. This file has been transmitted daily to MCI since August,
4 1997.

5

6

7 **Issue No. 12**

8 **HAS BELLSOUTH PROVIDED MCIMETRO WITH ACCESS TO**
9 **DIRECTORY LISTINGS INFORMATION IN COMPLIANCE WITH THE**
10 **TELECOMMUNICATIONS ACT OF 1996 AND THE PARTIES'**
11 **INTERCONNECTION AGREEMENT? IF NO, WHAT ACTION, IF**
12 **ANY, SHOULD THE COMMISSION TAKE?**

13

14 Q. WHAT ACCESS TO DIRECTORY LISTING INFORMATION IS
15 BELLSOUTH REQUIRED TO PROVIDE TO MCIM?

16

17 A. As Mr. Martinez states in his testimony on Page 21, Lines 18-21,
18 BellSouth is required by the Interconnection Agreement, Attachment
19 VIII, Section 6.1.6.1 (Exhibit JDH-15), to "provide to MCI, to the
20 extent authorized, the residential, business, and government
21 subscriber records used by BellSouth to create and maintain its
22 Directory Assistance Data Base, in a non-discriminatory manner."
23 (Emphasis added.)

24

25

1 Q. DOES THE AGREEMENT SPECIFICALLY ADDRESS DIRECTORY
2 ASSISTANCE LISTINGS FOR INDEPENDENT TELEPHONE
3 COMPANIES?

4

5 A. Yes. In Attachment VIII, Section 6.1.6.2, "Upon request, BellSouth
6 shall provide an initial load of subscriber records...for ILECS, CLECs
7 and independent Telcos included in their Directory Assistance
8 Database, to the extent authorized." (Emphasis added.) Also,
9 Attachment VIII, Section 6.2.2.2 adds that BellSouth shall provide
10 MCIm several lists including a "List of Independent Company names
11 and their associated NPA-NXXs for which their listing data is a part of
12 BellSouth's directory database, but BellSouth is not to provide the
13 listing data to MCIm under this request."

14

15 Q. HAS BELLSOUTH MADE ANY ADDITIONAL EFFORTS TO PROVIDE
16 TO MCIM ANY INCUMBENT LOCAL EXCHANGE COMPANY (ILEC)
17 LISTINGS WHICH APPEAR IN BELLSOUTH'S DIRECTORY
18 DATABASE?

19

20 A. Yes. In Florida, BellSouth has secured authorization from the ILECs
21 for which BellSouth performs directory assistance services to share this
22 information with ALECs.

23

24 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

25 A. Yes.

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Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

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BellSouth Telecommunications, Inc.
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Room 400
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RECORDS AND
REPORTING

June 29, 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. 980281-TP MCI Complaint

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Jerry Hendrix, W. Keith Milner, and William N. Stacy, 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.

*Jerry Hendrix 06835-98
W. Keith Milner 06836-98
William N. Stacy 06837-98*

Sincerely,

Nancy B. White

Nancy B. White (BW)

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU *Stavanza*
- CTR _____
- EAG _____
- LEG
- LIN *5t orig*
- OPC _____
- RCH _____
- SEC
- WAS _____
- OTH _____

NBW/vf

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

RECEIVED & FILED

[Signature]
FPSC BUREAU OF RECORDS

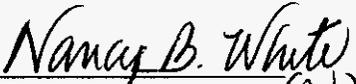
CERTIFICATE OF SERVICE
Docket No. 980281-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by U.S. Mail this 29th day of June, 1998 to the following:

Beth Keating
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Nancy B. White (BW)