1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   REBUTTAL TESTIMONY OF WILLIAM N. STACY

3   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4   DOCKET NO. 980281-TP

5   June 29, 1998

6

7   Q.   PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH

8   BELLSOUTH TELECOMMUNICATIONS, INC.

9

10 A.   My name is William N. Stacy. My business address is 675 West

11   Peachtree Street, Atlanta, Georgia 30375. I am the Operations Vice

12   President - Interconnect Services for the Interconnect Operations

13   department of BellSouth.

14

15 Q.   ARE YOU THE SAME WILLIAM N. STACY WHO FILED DIRECT

16   TESTIMONY IN THIS DOCKET?

17

18 A.   Yes.

19

20 Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED

21   TODAY?

22   :

23

24

25

1 A.   The purpose is of my testimony to rebut the testimony filed by Ronald

2   Martinez and Bryan Green of MCImetro. Specifically I will address their

3   testimony related to Issues One through Seven, and Nine.

4

5 Issue One

6 Has BellSouth provided MCImetro with information about BellSouth's

7 OSS and related databases in compliance with the Telecommunications

8 Act of 1996 and the parties' Interconnection Agreement? If no, what

9 action, if any, should the Commission take?

10

11 Q.   ON PAGE 6 OF HIS TESTIMONY, MR. MARTINEZ QUOTES A

12   STATEMENT MS. CALHOUN MADE BEFORE THE GEORGIA

13   PUBLIC SERVICE COMMISSION ON JULY 14, 1997. DID SHE

14   INTEND THIS STATEMENT AS AN INVITATION TO ALECS TO

15   INSPECT BELLSOUTH'S RETAIL SYSTEMS?

16

17 A.   No. Ms. Calhoun was by no means extending an invitation to

18   MCImetro or any other Alternative Local Exchange Company (ALEC) to

19   inspect BellSouth's retail operations support systems (OSS), nor did

20   she represent that she was authorized to do so. Concerns about this

21   request in fact were raised by BellSouth's attorneys during this hearing

22   and later reiterated to MCImetro by BellSouth's Georgia attorney, Mr.

23   McCallum. Although MCImetro's request for a detailed field-by-field

24   examination of all the software underlying all of BellSouth's systems

25

1   and databases is completely inappropriate, MCImetro and other ALECs

2   have had three demonstrations, in Florida, North Carolina, and

3   Alabama, of BellSouth's retail systems, and some of those

4   demonstrations are acknowledged by both Mr. Martinez and Mr. Green.

5   Because BellSouth's systems contain proprietary information such as

6   marketing and sales information, allowing competitors to inspect those

7   systems is inconsistent with any normal or reasonable business

8   practice. BellSouth does not offer the intellectual property represented

9   by its systems to its competitors, nor should it be expected to do so.

10   BellSouth's position on this issue was made clear by the July 29, 1997

11   letter to David I. Adelman of MCImetro from Fred McCallum, Jr. of

12   BellSouth. This letter was attached to the testimony of Mr. Martinez as

13   Exhibit 7.

14

15   Q.   IS THERE A BETTER WAY OF ADDRESSING ISSUES OF PARITY?

16

17   A.   Yes. MCImetro does have a way of determining whether or not parity

18   exists between BellSouth and MCImetro without inspecting BellSouth's

19   proprietary systems. BellSouth posts a complete set of performance

20   measurements on the BellSouth interconnection web site. These

21   performance measurements indicate BellSouth's performance for

22   ALECs as compared to BellSouth's retail performance where a retail

23   analogue exists.

24

25

1 Q. BOTH MR. MARTINEZ AND MR. GREEN COMPLAIN THAT

2 BELLSOUTH'S RETAIL OSS PROVIDES CERTAIN ADVANTAGES

3 OVER THE INTERFACES OFFERED TO ALECS. PLEASE

4 COMMENT.

5

6 A. First, neither Mr. Martinez nor Mr. Green mention any specific systems

7 or specific supposed advantages from which to comment. Second, the

8 system used by BellSouth for retail business orders is the Direct Order

9 Entry (DOE) system, which is a much older, less user-friendly system

10 than EDI or LENS, and does not provide all the features available in

11 EDI or LENS.

12

13 Q. MR. GREEN COMPLAINS THAT LENS IS DEFICIENT BECAUSE IT

14 IS NOT A MACHINE-TO-MACHINE INTERFACE, AND CLAIMS THAT

15 BELLSOUTH HAS NO MACHINE-TO-MACHINE PRE-ORDERING

16 INTERFACE. PLEASE COMMENT.

17

18 A. As Mr. Green knows from several meetings, workshops, affidavits,

19 testimonies and hearings, LENS has a machine-to-machine version

20 called CGI (Common Gateway Interface). BellSouth has given MCI the

21 complete CGI specifications numerous times, including on December

22 15, 1997, as Mr. Green acknowledges on page 4 of his direct

23 testimony, and on April 8, 1998, contrary to Mr. Green's claims on page

24

25

1   7. Additionally, BellSouth offers another machine-to-machine pre-

2   ordering interface called EC-Lite.

3

4 Q. MR. GREEN CLAIMS ON PAGES 8 AND 9 THAT BELLSOUTH HAS

5   NOT PROVIDED MCI WITH A LENS DATA DICTIONARY. IS THIS

6   CORRECT?

7

8 A. No. Even though MCI does not need a LENS data dictionary -- the

9   information MCI needs to use CGI is in the CGI specification and the

10   LENS User Guide -- BellSouth nonetheless provided MCI a data

11   dictionary on May 22, 1998.

12

13 Q. MR. GREEN CLAIMS ON PAGE 10 THAT CGI-LENS IS NOT AN

14   ACCEPTABLE PRE-ORDERING INTERFACE. PLEASE COMMENT.

15

16 A. First, Mr. Green says CGI is non-standard. There is no pre-ordering

17   standard yet (this will be discussed further in the next answer).

18   Second, Mr. Green thinks that CGI involves screen scraping (taking

19   unfielded data straight from the screen to a text file), which is totally

20   incorrect. CGI-LENS is indeed a true application-to-application, or

21   machine-to-machine pre-ordering interface, as BellSouth has proven

22   with a third-party software vendor, Albion International. BellSouth

23   asked Albion to act as a ALEC and build software integrating CGI-

24   LENS and EDI-PC for an order type, to prove that it could be done

25

1   quickly and cheaply. A document describing the Albion software was

2   attached to my direct testimony as Exhibit WNS-23. That software now

3   exists, and has been shown to the FCC and other state PSCs. Another

4   point that this software proves is that CGI-LENS is indeed an

5   operational pre-ordering interface. MCI has seen this software

6   demonstrated recently in the Tennessee 271 hearing in May, and has

7   requested another demonstration of this software from Albion, who is

8   arranging this demonstration.

9

10 Q.   MR. GREEN DISCUSSES TWO PRE-ORDERING PROTOCOLS,

11   TCP/IP/SSL3 AND CORBA, ON PAGE 11. PLEASE COMMENT.

12

13 A.   As Mr. Green does indicate, BellSouth is indeed building an Application

14   Programming Interface (API) based on CORBA. BellSouth is using

15   CORBA rather than TCP/IP/SSL3 for API because the Electronic

16   Communications Implementation Committee (ECIC) has indicated that

17   CORBA is **the** likely long-term pre-ordering standard. ECIC is

18   struggling with both CORBA and TCP/IP/SSL3 presently.

19

20 **Issue Two**

21 **Has BellSouth provided MCImetro with the Street Address Guide (SAG)**

22 **data in compliance with the Telecommunications Act of 1996 and the**

23 **parties' Interconnection Agreement? If no, what action, if any should the**

24 **Commission take?**

25

1

2   Q.   WHAT IS BELLSOUTH REQUIRED TO PROVIDE TO MCImetro

3   ACCORDING TO THE TERMS OF THE BELLSOUTH/MCImetro

4   INTERCONNECTION AGREEMENT?

5

6   A.   As Mr. Martinez indicates, according to Attachment VIII, Section 2.1.3.1

7   of the agreement, "BellSouth shall provide to MCImetro the SAG data,

8   or its equivalent, in electronic form. All changes to the SAG shall be

9   made available to MCImetro on the same day as the change to the

10   data is made."

11

12 Q.   IN HIS TESTIMONY AT PAGE 10, MR. MARTINEZ SUGGESTS THAT

13   ATTACHMENT VIII, SUBSECTION 2.3.2.5 OF THE

14   INTERCONNECTION AGREEMENT SUPPORTS MCImetro's

15   POSITION THAT BELLSOUTH SHOULD PROVIDE A DOWNLOAD

16   OF THE RSAG DATABASE. DO YOU AGREE?

17

18 A.   No. Mr. Martinez states that Subsection 2.1.3.1 refers to a one time

19   provision of the Regional Street Address Guide (RSAG) database

20   followed by updates and that the existence of Subsection 2.3.2.5,

21   which addresses online access, "demonstrates that the parties

22   intended it to confer rights distinct from and in addition to the right to

23   electronic download provided in Subsection 2.1.3.1." Mr. Martinez

24   quotes these two subsections without putting them into the proper

25

1   context as they relate to other portions of the agreement. Subsection

2   2.1.3.1 is under the larger heading of General Business Requirements

3   (2.1) and is intended to identify general business requirements of the

4   parties covering such areas as access to, among other things, the

5   Local Carrier Services Center (LCSC), Subscriber Payment History,

6   CLASS and Custom Calling Features and RSAG. Subsection 2.3.2.5,

7   on the other hand, is under the larger heading of Systems Interfaces

8   and Information Exchanges (2.3) and spells out the manner in which

9   the general business requirement of access to RSAG will be provided.

10

11   In referencing Subsection 2.3.2.5, Mr. Martinez fails to reference one

12   other subsection that provides convincing evidence that BellSouth

13   intended that MCImetro access RSAG electronically and not through a

14   download of the RSAG database. Subsection 2.1.1.2 states, "For

15   resale purposes, BellSouth shall provide real time electronic interfaces

16   ("EI") for transferring and receiving Service Orders and provisioning

17   data and materials (e.g., access to Street Address Guide ("SAG") and

18   Telephone Number Assignment database). These interfaces shall be

19   administered through a gateway that will serve as a point of contact for

20   the transmission of such data from MCImetro to BellSouth, and from

21   BellSouth to MCImetro." Subsection 2.1.3.1 is only two paragraphs

22   after 2.1.1.2 and states that BellSouth shall provide SAG data in

23   electronic form, supporting the wording of Subsection 2.1.1.2.

24   Therefore, based upon Subsection 2.1.1.2, it is clear that access to

25

1   RSAG was intended to be provided via electronic interface such as

2   through LENS and was never contemplated that it be provided as a

3   "download" of the entire database.

4

5 Q. ON PAGE 12 OF HIS TESTIMONY, MR. GREEN STATES THAT

6   RSAG ACCESS VIA LENS IS UNACCEPTABLE. PLEASE

7   COMMENT.

8

9 A. Mr. Green states that RSAG access via LENS does not allow ALECs to

10   integrate their pre-ordering and ordering functions, and tailor their

11   usage of the data to their own needs. That is precisely what CGI-LENS

12   does, which the third-party software described above proves.

13

14 Q. HAS ANY OTHER ALEC REQUESTED A DOWNLOAD OF RSAG?

15

16 A. No. Of the approximately 80 ALECs who are using LENS for electronic

17   pre-ordering, MCImetro is the only ALEC who is requesting a download

18   of RSAG. That says that about 79 ALECs are successfully performing

19   address validation via RSAG-LENS access.

20

21 Q. WHAT IS THE CURRENT STATUS OF BELLSOUTH PROVIDING A

22   DOWNLOAD OF RSAG TO MCImetro?

23

24

25

1 A. Even though a download of RSAG is not required to fulfill BellSouth's

2 obligation of non-discriminatory OSS access, since BellSouth has been

3 ordered by the Georgia PSC to provide a download of the entire region-

4 wide RSAG to MCImetro, BellSouth is proceeding with doing so. This

5 will be accomplished later this year. The significant cost issue for

6 providing this download to MCImetro will be addressed separately with

.7 MCImetro and with the Georgia PSC if necessary.

8

9 **Issue Three**

10 **Has BellSouth provided MCImetro with the due date calculation for a**

11 **service order request from a customer in compliance with the**

12 **Telecommunications Act of 1996 and the parties' Interconnection**

13 **Agreement? If no, what action, if any, should the Commission take?**

14

15 Q. DO YOU AGREE WITH MR. GREEN'S CHARACTERIZATION OF

16 THE DUE DATE CAPABILITIES PROVIDED TO MCIMETRO

17 THROUGH LENS?

18

19 A. No. Mr. Green's testimony contains several inaccurate or misleading

20 statements. First, for most orders, Mr. Green is incorrect in stating that

21 an MCImetro representative using the LENS inquiry mode must make

22 calculations based on several pieces of information, such as installation

23 intervals or normal working days. In fact, for most ALEC orders that

24 information is not relevant at all, because that information only applies

25

1   to orders for new service requiring a premises visit by an installation

2   technician. It does not apply to existing customers switching from

3   BellSouth to an ALEC, to orders for new service where facilities are

4   already connected through to the customer's premises, or for changes

5   such as adding or changing features for existing service. Intervals for

6   those orders are determined by standard "business rules" that have

7   been provided to ALECs including MCImetro through industry letters

8   and on BellSouth's web site, as stated in my direct testimony. These

9   rules explain, for example, that orders to switch an existing customer

10   "as is" to the ALEC carry a same day due date if sent to BellSouth

11   before 3:00 p.m. EST, and carry a next day due date if sent after 3:00

12   p.m. EST. While Mr. Green complains that RNS "highlights" calculated

13   due dates for selection by a BellSouth sales representative, the fact is

14   that all necessary due-date affecting information has been provided to

15   ALECs, and they are free to incorporate it in their systems with

16   highlighting, color coding, or any other means of display.

17

18 Q. ON PAGE 18 OF HIS TESTIMONY, MR. GREEN COMPLAINS THAT

19   LENS DOES NOT GIVE MCIMETRO THE SAME ABILITY TO

20   CALCULATE DUE DATES AS RNS. HOW MAY MCIMETRO OBTAIN

21   DUE DATE INFORMATION WHEN USING LENS?

22

23 A. If MCImetro uses the firm order mode of LENS or CGI-LENS or EC-

24   Lite, it will receive a calculated due date, just as RNS does under the

25

Page 11

1   same conditions. MCImetro, or any other ALEC, also can obtain due

2   date information on services requiring a premises visit from the Direct

3   Order Support System (DSAP) through the inquiry mode of LENS. The

4   ALEC's representative sends an inquiry to, and receives a response

5   from, DSAP. In response to an ALEC query, LENS will display an

6   installation calendar with information for the specific central office

7   serving an end user customer's location that shows substantially the

8   same information used by BellSouth, including the work schedule for

9   the office, the current appointment intervals, and any dates already

10   closed. Contrary to MCImetro's assertions, the LENS installation

11   calendar also provides relevant information regarding the end user

12   customer's situation, such as whether QuickService is available or

13   whether the end user customer's property is already connected through

14   to the central office (ConnectThrough). The LENS due date

15   information allows the ALEC to provide its customers with due dates

16   during an initial telephone call with a customer, not several hours after

17   the fact, as Mr. Green alleges.

18

19   In addition to the information available on intervals for premises visits in

20   the inquiry mode of LENS, ALECs including MCImetro have been

21   provided with tables of standard intervals that can be used by the

22   ALECs' systems to calculate due dates.

23

24

25

1 Q. HAS BELLSOUTH PROVIDED THESE INTERVALS FOR

2 UNBUNDLED NETWORK ELEMENTS (UNES) AS WELL?

3

4 A. Yes, BellSouth provides intervals for resale services as well as UNEs to

5 the ALECs, and has done so since a year ago.

6

7 Q. HOW DOES BELLSOUTH HANDLE EXPEDITED ORDERS?

8

9 A. When a customer requests an expedite, the service representative

10 transfers the customer to another representative who has been

11 designated to handle such requests. The business decision was made

12 by BellSouth to keep service representatives available for incoming

13 customer calls. The designated representative makes appropriate

14 telephone calls to determine whether an expedited due date interval is

15 possible and advises the customer accordingly.

16

17 MCImetro and other ALECs have substantially the same ability to

18 request information about expedited intervals by calling the Local

19 Carrier Service Center (LCSC), which in turn makes appropriate calls to

20 determine whether an expedited interval is possible. If MCImetro

21 wishes to keep its service representatives available, it may also

22 designate representatives to handle potential expedites.

23

24

25

1 Q. MCIMETRO STATED IN ITS COMPLAINT THAT BELLSOUTH HAS

2 NOT AGREED TO EXPEDITE ORDER DUE DATES. PLEASE

3 COMMENT.

4

5 A. Because MCImetro did not describe any specific incidents in its

6 Complaint or testimony, I can respond only generally to this.

7

8 Whenever MCImetro has called the LCSC and requested that an order

9 be expedited, without first submitting a complete and correct Local

10 Service Request (LSR) to the LCSC, its request has been denied. It is

11 not possible for BellSouth to agree to expedite a due date interval

12 without knowing the specifics involved, such as the quantity of lines

13 being ordered or the particular location involved.

14

15 Whenever MCImetro has submitted a completed and correct LSR and

16 requested expedited service, BellSouth has handled the order

17 appropriately to see if an expedite is possible. The LCSC provides

18 MCImetro with the best due date possible. However, just as for

19 BellSouth's retail customers, it is not always possible to meet each and

20 every request for an expedited interval, particularly if the requested

21 interval is unrealistic.

22

23 **Issue Four**

24

25

1 **Has BellSouth provided MCImetro parity in access to telephone**

2 **numbers and telephone number information in compliance with the**

3 **Telecommunications Act of 1996 and the parties' Interconnection**

4 **Agreement? If no, what action, if any, should the Commission take?**

5

6 Q.   MR. GREEN COMPLAINS THAT ALECS CANNOT RESERVE THE

.7   SAME NUMBER OF TELEPHONE NUMBERS PER ORDER AS

8   BELLSOUTH. IS THIS CORRECT?

9

10 A.   Yes, only because ALECs can now actually reserve MORE telephone

11   numbers per order than BellSouth retail can. Using LENS, an ALEC

12   can reserve an unlimited number of telephone numbers; ALECs can

13   reserve 6 numbers at a time for an unlimited number of times per

14   session. RNS users can reserve 25 numbers, as Mr. Green indicates.

15

16 Q.   MR. GREEN CLAIMS ON PAGE 22 THAT ALECS HAVE NO WAY OF

17   VIEWING THE NXX CODES AVAILABLE TO THE CUSTOMERS. IS

18   THIS CORRECT?

19

20 A.   No. ALECs using LENS or EC-Lite for telephone number reservations

21   can see the available NXX codes just as BellSouth retail service

22   representatives using RNS or DOE do, because LENS, EC-Lite, RNS

23   and DOE all access the same database for telephone numbers, which

24

25

1   is called Application for Telephone Number Load Administration and

2   Selection (ATLAS).

3

4   **Issue Five**

5   **Has BellSouth provided MCImetro with access to Universal Service**

6   **Order Codes (USOCs) in compliance with the Telecommunications Act**

7   **of 1996 and the parties' Interconnection Agreement? If no, what action,**

8   **if any, should the Commission take?**

9

10 Q.   CAN ALECS DOWNLOAD THE USOCS FROM THE BELLSOUTH

11   WEB SITE IN MULTIPLE FORMATS, TO ADDRESS MR. GREEN'S

12   COMPLAINT ABOUT FORMAT?

13

14 A.   Yes. As of June 8, 1998, the USOCs information on BellSouth's web

15   site is now available in an additional format which is a generic format

16   that will enable customers to import USOC information into

17   spreadsheets and databases, as MCImetro requested. The USOC

18   information from BellSouth's web site can indeed be integrated into

19   MCImetro's front-end pre-ordering systems.

20

21 Q.   HAS BELLSOUTH PROVIDED MCIMETRO A DESCRIPTION OR

22   DEFINITION OF EACH OF ITS USOCS, INCLUDING THE REQUIRED

23   FIELD IDENTIFIERS (FIDs) AND THEIR DESCRIPTIONS AND THE

24   STATES IN WHICH THE USOCS ARE VALID?

25

1

2   A.   Yes. BellSouth has provided exactly that requested USOC and FID

3   *information in a couple ways: since April 1997 in the Local Exchange*

4   Ordering Implementation Guide (L.E.O. GUIDE), where the USOCs

5   and associated required FIDs are clearly indicated, and via the USOC

6   manual on the web and via the SOER edits containing all the FIDs,

7   which are also available on the web.

8

9   Q.   MR. GREEN MENTIONS THAT USOC ERRORS ARE AMONG THE

10   MORE FREQUENT ALEC ORDER ERRORS. ARE THERE ANY

11   ALECS INDICATING THE PROPER USOCS ON THEIR ELECTRONIC

12   ORDERS?

13

14   A.   Yes, there are. There are a few ALECs who have demonstrated the

15   ability to achieve more than 90% flow-through on their electronic orders

16   in BellSouth, indicating that they are able to indicate the required

17   USOCs and FIDs on their orders as indicated in BellSouth's L.E.O.

18   GUIDE.

19

20 **Issue Six**

21 **Has BellSouth provided MCImetro with customer service record (CSR)**

22 **information in compliance with the Telecommunications Act of 1996 and**

23 **the parties' Interconnection Agreement? If no, what action, if any,**

24 **should the Commission take?**

25

1

2 Q. MR. GREEN STATES THAT RNS PROVIDES GREATER ACCESS TO

3 CSR INFORMATION. PLEASE COMMENT.

4

5 A. Mr. Green's' complaint is rather vague, and so it is difficult to respond

6 to it. However, MCImetro arbitrated the issue of access to customer

7 service records on the basis that information from the CSR was

8 necessary for an ALEC to provide telephone service. Accordingly,

9 LENS displays the following data elements, which were identified as

10 necessary for an ALEC to provision telephone service. As stated in my

11 direct testimony, these include:

12 Telephone Number

13 Listed Name

14 Listed Address

15 Directory Listing Information

16 Directory Delivery Information

17 Billing Name

18 Billing Address

19 Service Address

20 Product and Service Information

21 PIC and LPIC (Presubscribed Interexchange Carrier and Local

22 • Presubscribed Interexchange Carrier)

23

24

25

1   The only specific difference in retail versus ALECs' viewing of CSRs

2   that Mr. Green mentions is that pricing information is a part of retail

3   CSRs and not included in ALECs' CSRs. That is correct. As described

4   in my direct testimony, BellSouth maintains that customer-specific retail

5   pricing information is proprietary information, which would give ALECs

6   an unfair marketing advantage in seeing BellSouth's customer-specific

7   retail rates, which BellSouth does not see for ALECs. BellSouth's retail

8   rates are publicly available as a part of BellSouth's tariffs, so that

9   MCImetro does have access to BellSouth's pricing information.

10

11   **Issue Seven**

12   **Has BellSouth provided MCImetro with service jeopardy notification in**

13   **compliance with the Telecommunications Act of 1996 and the parties'**

14   **Interconnection Agreement? If no, what action, if any, should the**

15   **Commission take?**

16

17   Q.   MR. GREEN'S TESTIMONY INDICATES THAT MCIMETRO HAS

18   REQUESTED ELECTRONIC NOTIFICATION OF SERVICE

19   JEOPARDIES VIA EDI. PLEASE COMMENT.

20

21   A.   Mr. Green's assertion that MCImetro has requested electronic

22   notification of service jeopardies via EDI is not supported by the letter

23   provided as his Exhibit 15. The final sentence of that letter reads:

24   "Please provide a response by August 29, 1997 detailing whether

25

1   BellSouth will support **the manual process proposed by MCI** or an

2   alternative process." (Emphasis added). Nonetheless, BellSouth is

3   entertaining the possibility of electronic notification via EDI in advance

4   of any standards for electronic service jeopardies. However, it is

5   important to understand that establishing this process would not be a

6   unilateral effort by BellSouth, but would require substantial work by

7   BellSouth and by any interested ALEC on their respective sides of the

8   EDI interface. BellSouth does provide electronic service jeopardies via

9   LENS.

10

11 Q. IF INTERIM CODES FOR SERVICE JEOPARDIES WERE DEFINED

12   AND IMPLEMENTED BY BELLSOUTH AND MCIMETRO, WHAT

13   WOULD HAPPEN IF THE INTERIM CODES DIFFERED FROM THE

14   NATIONAL STANDARD?

15

16 A. Should that occur, BellSouth and MCImetro would be forced to rewrite

17   and recode their respective sides of the EDI interface. Once the

18   national standard is established, BellSouth is committed to following it;

19   significantly, BellSouth's interconnection agreement with MCImetro

20   requires this.

21

22 **Issue Nine**

23 **Has BellSouth provided MCImetro with network blockage measurement**

24 **information in compliance with the Telecommunications Act of 1996 and**

25

Page 20

1   the parties' Interconnection Agreement. If no, what action, if any, should

2   the Commission take?

3

4   Q.   MR. MARTINEZ ON PAGES 15-17 OF HIS TESTIMONY CRITICIZES

5   BELLSOUTH'S RESPONSE TO MCIMETRO'S REQUEST FOR

6   TRUNK BLOCKAGE DATA. HOW HAS BELLSOUTH RESPONDED

7   TO MCImetro?

8

9   A.   BellSouth produces three blocking measurements as a part of its

10   Service Quality Measurements (SQM) package which incorporates all

11   four of the reports requested by MCImetro. These reports are located

12   on page 34 of BellSouth's current SQM and are described in my direct

13   testimony:

14   1. Comparative Trunk Group Service Summary,

15   2. Trunk Group Service Report, and

16   3. Trunk Group Service Detail.

17   BellSouth began providing aggregate blocking reports in February and

18   ALEC specific reports on June 15, 1998. This information is posted on

19   the BellSouth ALEC Performance Measurement Internet web page by

20   the fifteenth of each month for the previous month's data. These

21   reports should satisfy all of MCImetro's trunk blocking requests.

22   .*

23 Q.   DOES THIS CONCLUDE YOUR TESTIMONY?

24

25

1   A.   Yes, it does.

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