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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF DAVID A. COON
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 990149-TP
APRIL 1, 1999

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.

A. My name is David A. Coon. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Director - Interconnection Services for BellSouth Telecommunications, Inc. ("BellSouth") and am responsible for managing certain aspects of BellSouth's performance measurements.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My career at BellSouth spans over 20 years and includes positions in Network, Regulatory, Finance, Corporate Planning, Small Business Services and Interconnection Operations. Prior to BellSouth I performed a variety of functions in the Network, Regulatory and Marketing Support organizations of C&P Telephone Company-Washington. I have extensive experience in the development and use

1 of quantitative measurements and results including the establishment,
2 analysis and monitoring of BellSouth process measures.

3

4 I received a Bachelors Degree in Civil Engineering from Ohio University
5 and a Masters Degree in Engineering Administration from George
6 Washington University. I received the Certified Management
7 Accountant (CMA) designation in 1996 from the Institute of
8 Management Accountants.

9

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

12

13 A. I will respond to the performance measurements aspects of Issues 1
14 and 12 which are a part of MediaOne's Petition for Arbitration in
15 Florida, filed on February 9, 1999 and received by BellSouth on
16 February 25, 1999.

17

18

19 **ISSUE 1: SHOULD THE AUDIT PROVISIONS IN THE PARTIES'**
20 **INTERCONNECTION AGREEMENT INCLUDE AUDITING OF SERVICES**
21 **OTHER THAN BILLING?**

22

23 Q. WHAT IS BELLSOUTH'S POSITION ON MEDIAONE'S RIGHT TO
24 AUDIT BELLSOUTH'S PERFORMANCE MEASUREMENTS?

25

1 A. All ALECs have a right to the results of an audit of BellSouth's Service
2 Quality Measurements (SQM). However BellSouth believes it is
3 unreasonable and unduly burdensome to conduct individual audits of
4 the SQM for each of the ALECs in Florida.

5

6 Q. IS IT NECESSARY TO EXPAND THE AUDIT PROVISION IN THE
7 INTERCONNECTION AGREEMENT TO ALLOW MEDIAONE TO
8 AUDIT PERFORMANCE MEASURES?

9

10 A. No. There are already adequate provisions in the proposed
11 Interconnection Agreement between BellSouth and MediaOne
12 regarding auditing of Performance Measures.

13

14 Q. WHAT PROVISIONS FOR AUDITING PERFORMANCE
15 MEASUREMENTS ARE ALREADY INCLUDED IN THE PROPOSED
16 INTERCONNECTION AGREEMENT?

17

18 A. Attachment 10 of the proposed Interconnection Agreement describes
19 the performance measurements applicable to the Interconnection
20 Agreement. Appendix C of Attachment 10 contains the audit policy
21 which is as follows:

22

BELLSOUTH'S AUDIT POLICY:

23 BellSouth currently provides many CLECs with audit rights as a
24 part of their individual interconnection agreements. However, it
25 is not reasonable for BellSouth to undergo an audit for every

1 CLEC with which it has a contract. As of November 20, 1998,
2 that would equate to over 600 audits per year and that number is
3 continually growing. BellSouth is in the process of developing a
4 proposed set of reasonable controls associated with individual
5 CLEC audits. In addition, BellSouth will conduct a
6 comprehensive audit of the aggregate level reports for both
7 BellSouth and the CLECs for each of the next five (5) years, to
8 be conducted by an independent third-party. The results of that
9 audit will be made available to all the parties subject to proper
10 safeguards to protect proprietary information. This aggregate
11 level audit includes the following specifications:

- 12
- 13 1. The cost be borne 50% by BellSouth and 50% by the CLECs.
- 14
- 15 2. The independent third party auditor shall be selected with
16 input from both BellSouth and the CLECs
- 17
- 18 3. The scope of the audit shall be jointly determined by
19 BellSouth and the CLECs.
- 20

21 BellSouth reserves the right to make changes to this audit policy
22 as growth and changes in the industry dictate.

23 This audit policy is publicly posted on the Internet at
24 <https://clec.bellsouth.com/fccsqm.doc> as an integral part of BellSouth's
25 SQM.

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Q: HAVE OTHER COMMISSIONS RULED ON THE AUDITING OF PERFORMANCE MEASURES?

A. Yes. The Georgia Public Service Commission ordered auditing rights, both for the Commission and individual CLECs in the Georgia Public Service Commission Order, Docket No. 7892-U, adopted May 6, 1998, § IV. The following statements are included in the Conclusions and Ordering Paragraphs, ¶¶ 8 & 9:

¶ 8, “**ORDERED FURTHER**, that the Commission retains the authority to audit the accuracy of the data in the Performance Monitoring Reports;”

¶ 9, “**ORDERED FURTHER**, that BellSouth shall permit competing carriers reasonable audit rights.”

Q. HOW HAS BELLSOUTH IMPLEMENTED THIS ORDER?

A. BellSouth has adopted the order of the Georgia Public Service Commission regarding Performance Measurements auditing rights on a regional basis, applicable to all states including Florida.

1 In summary, since there are already performance monitoring auditing
2 mechanisms in place, an individual audit for MediaOne is unnecessary.

3

4 Additional comments on Issue 1 are included in the Direct Testimony of
5 Jerry Hendrix, filed April 1, 1999.

6

7

8 **ISSUE 12: WHAT, IF ANY, PERFORMANCE MEASUREMENTS ARE**
9 **APPROPRIATE WITH RESPECT TO THE PROVISION OF STAND-ALONE**
10 **LNP FOR MEDIAONE?**

11

12 Q. WHAT IS BELLSOUTH'S POSITION ON ISSUE 12?

13

14 A. The appropriate measurements for inclusion in the MediaOne
15 agreement should be BellSouth's Service Quality Measurements.
16 There is adequate product level detail in the existing BellSouth SQM to
17 insure BellSouth is providing service in compliance with the 1996
18 Telecom Act (Act).

19

20 Q. PLEASE EXPLAIN HOW THE EXISTING SERVICE QUALITY
21 MEASUREMENTS INSURE COMPLIANCE WITH THE ACT?

22

23 A. BellSouth's SQM contain 9 levels of product disaggregation and are in
24 conformance with the product disaggregation ordered by the Georgia
25 Public Service Commission in Docket 78792-U, May 6, 1998.

1

2 Q. DOES MEDIAONE HAVE OTHER ALTERNATIVES BY WHICH IT
3 MAY HAVE FURTHER PRODUCT-LEVEL DISAGGREGATION SUCH
4 AS NUMBER PORTABILITY?

5

6 A. Yes. While the current SQM may not provide MediaOne with all of the
7 product details MediaOne requests, additional product-level information
8 is already available to MediaOne. Each month BellSouth makes
9 available to all ALECs "raw data" files that are from the same data
10 source that BellSouth uses to compile Performance Measurements
11 reported in the SQM. These files contain information that is product-
12 specific for each ALEC. The files are posted on a secure internet site.
13 By accessing this information, MediaOne can derive Performance
14 Measurements for other products not included in BellSouth's SQM.

15

16 Q. WHAT ARE BELLSOUTH'S PLANS FOR PRODUCING STAND-
17 ALONE PERFORMANCE MEASUREMENTS FOR LNP?

18

19 A. Based on the desire of MediaOne and other ALECs to have
20 performance reports that measure LNP as a standalone service
21 separate from the loop, BellSouth has begun the process of
22 investigating the requirements to develop measurements for Local
23 Number Portability with implementation during the second half of 1999.
24 Once the final operational and software requirements for this report are

25

1 identified, BellSouth will notify the ALECs of a target completion date
2 for implementing this capability.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

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Legal Department

J. PHILLIP CARVER
General Attorney

19 APR -1 PM 4:38

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

RECORDS AND
REPORTING

April 1, 1999

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 990149-TP

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Direct Testimony of D. Daonne Caldwell, David A. Coon, Jerry Hendrix, K. Keith Milner and Alphonso J. Varner. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver (cc)

J. Phillip Carver

Varner
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cc: All Parties of Record
M. M. Criser, III
N. B. White
W. J. Ellenberg

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[Signature]
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Milner
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<i>Caldwell</i>	<i>Coon</i>	<i>Hendrix</i>
DOCUMENT NUMBER-DATE	DOCUMENT NUMBER-DATE	DOCUMENT NUMBER-DATE
04236 APR-1999	04237 APR-1999	04238 APR-1999

RECORDS AND REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 990149-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
U. S. Mail this 1st day of April, 1999 to the following:

Martha Carter Brown
Florida Public Service
Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

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Jacksonville, FL 32256-6925
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J. Phillip Carver (see)
J. Phillip Carver