

In the Matter of )  
 )  
Petition by MEDIAONE FLORIDA )  
TELECOMMUNICATIONS, INC. )  
For Arbitration of an Interconnection )  
Agreement With BELLSOUTH )  
TELECOMMUNICATIONS, Inc. )  
Pursuant to Section 252(b) of the )  
Telecommunications Act of 1996. )

Docket No. 990149-TP

Filed: May 4, 1999

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REBUTTAL TESTIMONY OF JIM MAHER  
ON BEHALF OF MEDIAONE  
FLORIDA TELECOMMUNICATIONS, INC.

DOCUMENT NUMBER-DATE

~~05618 MAY 1999~~

F.P.S.C.-RECORDS/REPORTING

1 Q: Please state your name and business address.

2 A: My name is Jim Maher. My business address is 188 Inverness Drive West, Englewood,  
3 CO.

4 Q: Please identify your employer and your current position.

5 A: I am employed by MediaOne as Product Manager , Access Services. In that position, I  
6 manage access and interconnection agreements and arrangements between MediaOne and  
7 other carriers.

8 Q: Please describe your employment history.

9 A: I have twenty years experience in the telecommunications industry with U S WEST,  
10 Qwest and MediaOne, including work in product management and product development,  
11 network engineering, and carrier account management.

12 Q: What is the purpose of your rebuttal testimony?

13 A: The purpose of my rebuttal testimony is to rebut the testimony of Alphonso J. Varner of  
14 BellSouth Telecommunications (BST) on the pricing of Calling Name (CNAM) database  
15 queries.

16 Q: What is the CNAM database?

17 A: The CNAM database contains telephone numbers and the associated customer names.  
18 When a MediaOne customer with Caller ID receives a call, the calling party's carrier will  
19 transmit the calling party's telephone number. When the call reaches MediaOne's switch,  
20 the switch launches a query to the CNAM database; the database matches the calling  
21 party's telephone number to a customer name and transmits the name back to the switch.  
22 The switch then transmits the telephone number and the name to the called party, where  
23 the information shows up on the called party's Caller ID display.

1 Q: Who provides CNAM databases?

2 A: The incumbent LECs. In Florida, BST provides the competitive LECs, including  
3 MediaOne, with access to its CNAM database. BST also stores MediaOne's customers'  
4 names and telephone numbers in its CNAM database.

5 Q: Can any other supplier provide MediaOne with access to BST's CNAM data?

6 A: No. Each ILEC's CNAM database includes only its subscribers and the subscribers of  
7 other LECs who store their subscribers' names and telephone numbers there. We can get  
8 CNAM access from, say, Bell Atlantic in Massachusetts and Virginia, but not in Florida or  
9 Georgia. BST is our only option here.

10 Q: Does MediaOne need CNAM access to provide Caller ID?

11 A: Yes. MediaOne customers who get Caller ID, and nearly all of them do, have come to  
12 expect that they will receive both the calling number and calling name. If MediaOne could  
13 not get access to calling-name information, we would be at a tremendous competitive  
14 disadvantage. Indeed, in Exhibit AJV-2 attached to Mr. Varner's testimony, BellSouth  
15 argues that its carrier-customers should purchase its CNAM service because, in "a  
16 competitive environment," carriers must "ensure they offer the features customers want . .  
17 ."

18 Q: Mr. Varner claims (at page 14, lines 13-16) MediaOne is attempting to be relieved of its  
19 obligations under its existing CNAM agreement with BST. Is that true?

20 A: No. MediaOne fully intends to live up to its obligations under the existing agreement (Ex.  
21 AJV-1). That agreement provides that BST will charge MediaOne fifty dollars per 1,000  
22 access lines per month for CNAM service (see Exhibit A to the agreement). It further  
23 states that this rate will "convert to a per query usage rate" once BST has the necessary

1 system capabilities, but it does not establish what that rate will be. MediaOne has not  
2 agreed to pay whatever rate BST might wish to charge.

3 Q: Do you agree with Mr. Varner's contention that CNAM is not an unbundled network  
4 element?

5 A: I am not aware that any regulatory commission (including the FCC) has ruled one way or  
6 the other on this issue. The Communications Act defines a "network element" to include  
7 "databases . . . used in the transmission, routing, or other provision of a  
8 telecommunications service" (47 USC, 153(29)). Mr. Varner contends that CNAM  
9 cannot be a network element because it plays no role in the completion of a call. His  
10 argument overlooks the fact that the FCC has ruled that Calling Name Delivery is  
11 "adjunct-to-basic" (CC Docket No. 91-281, 10 FCC Rcd. 11700, para. 131) and thus  
12 itself a telecommunications service (see, CC Docket No. 96-149, 11 FCC Rcd. 21905,  
13 para. 107). Because BST's CNAM service is essential to MediaOne's delivery of calling  
14 name to its Caller ID customers, the Public Service Commission can and should determine  
15 that it is an unbundled network element.

16 Q: What would be an appropriate rate for CNAM?

17 A: I cannot say precisely because I do not know what it costs BST to provide the service. I  
18 can suggest three comparative benchmarks. First, the current flat-rate price (\$50 per  
19 1,000 access lines per month) equates to about six cents per line per month for MediaOne.  
20 Assuming an average line generates 225 queries per month (see Ex. AJV-2), BST's  
21 proposed price (one cent per query) equates to a charge of \$2.25 per line per month, more  
22 than a thirty-fold increase.

23 Second, the PSC should also consider BST's charges for local number portability (LNP)

1 database queries; the LNP database is similar to the CNAM database and has similar costs.

2 BST charges for LNP queries on a sliding scale based on volumes. At very low volumes,

3 BST charges \$.0013 per query; at the highest volumes, it charges \$.0005 per query.

4 Finally, BST charges \$.00383 for 800 database queries. The 800 database also has similar

5 costs to CNAM. BST's CNAM database will, however, receive many more queries

6 because its primary use is to provide calling name to BST's own Caller ID customer. The

7 CNAM rate should thus be much lower than the 800 database rate.

8 BST's proposed rate is far too high when compared to other similar services. Until BST

9 can submit a proper cost study, the PSC should allow BST to charge no more than its

10 highest rate for LNP query service, \$.0013 per query. That equates to about 30 cents per

11 month per Caller ID line, which still represents a five-fold increase over current rates.

12 Q: Does that conclude your testimony?

13 A: Yes.

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May 4, 1999

**VIA HAND DELIVERY**

Ms. Blanco Bayo, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 990149-TP

Dear Ms. Bayo:

Please find enclosed for filing the original and 15 copies of the rebuttal testimony of Greg Beveridge and Jim Maher on behalf of MediaOne Florida Telecommunications, Inc. Also enclosed is a series of photographs of an exhibit that will be utilized at hearing by Mr. Greg Beveridge in his description of MediaOne's UNTW proposal. 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.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

  
William B. Graham

AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMD King  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 2  
MAS 2 + mg  
OPC \_\_\_\_\_  
RRR \_\_\_\_\_  
SEC \_\_\_\_\_  
WAW \_\_\_\_\_  
OTH \_\_\_\_\_  
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Encls.  
cc: Susan Keesen  
Jim Campbell

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne  
Florida Telecommunications,  
Inc. for arbitration of an  
interconnection agreement with  
BellSouth Telecommunications,  
Inc. pursuant to Section 252(b) DOCKET NO. 990149-TP  
of the Telecommunications Act  
of 1996.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing filing has  
been furnished by U.S. Mail to:

J. Phillip Carver, Esq.  
BellSouth Telecommunications, Inc.  
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Beth Keating, Esq.  
Florida Public Service Commission  
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this 4th day of May, 1999.



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