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BELLSOUTH TELECOMMUNICATIONS, INC.  
DIRECT TESTIMONY OF W. KEITH MILNER  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 990108-TP

May 17, 1999

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

A. My name is W. Keith Milner. My business address is 675 West  
Peachtree Street, Atlanta, Georgia 30375. I am Senior Director -  
Interconnection Services for BellSouth Telecommunications, Inc.  
("BellSouth"). I have served in my present role since February 1996  
and have been involved with the management of certain issues related  
to local interconnection, resale, and unbundling.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 28 years and includes responsibilities  
in the areas of network planning, engineering, training, administration,  
and operations. I have held positions of responsibility with a local  
exchange telephone company, a long distance company, and a  
research and development laboratory. I have extensive experience in  
all phases of telecommunications network planning, deployment, and

1 operations (including research and development) in both the domestic  
2 and International arenas.

3

4 I graduated from Fayetteville Technical Institute in Fayetteville, North  
5 Carolina in 1970 with an Associate of Applied Science in Business  
6 Administration degree. I also graduated from Georgia State University  
7 in 1992 with a Master of Business Administration degree.

8

9 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC  
10 SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE  
11 SUBJECT OF YOUR TESTIMONY.

12

13 A. I testified before the state Public Service Commissions in Alabama,  
14 Florida, Georgia, Kentucky, Louisiana, Mississippi and South Carolina,  
15 the Tennessee Regulatory Authority and the Utilities Commission in  
16 North Carolina on the issues of technical capabilities of the switching  
17 and facilities network regarding the introduction of new service  
18 offerings, expanded calling areas, unbundling, and network  
19 interconnection.

20

21 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY BEING  
22 FILED TODAY?

23

24 A. I will set forth BellSouth's position on various issues raised by Access  
25 One Communications, Inc. ("Access One") in its complaint filed with this

1 Commission against BellSouth on January 27, 1999. Specifically, I will  
2 address Issues 2 and 3 as set forth in Appendix A, TENTATIVE LIST  
3 OF ISSUES, of Order No. PSC-99-0899-PCO-TP issued April 30,  
4 1999. I will not address Issue 4 at this time, as I understand BellSouth  
5 and Access One have resolved that issue.

6

7 Q. ACCESS ONE REFERS TO VARIOUS LETTERS AND/OR  
8 NOTIFICATIONS IN ITS COMPLAINT. PLEASE IDENTIFY THE  
9 LETTERS THAT ARE BEING DISCUSSED.

10

11 A. Two letters are being discussed. BellSouth mails one letter to an end  
12 user when a BellSouth end user switches to an Alternative Local  
13 Exchange Carrier ("ALEC") for local telephone service. This letter is  
14 the topic of Issue 2. BellSouth sends a second letter, referred to as a  
15 "Change of Carrier Notification Letter," to an ALEC when an end user  
16 switches from that ALEC to another local service provider. This second  
17 letter is discussed in Issue 3.

18

19 ISSUE 2

20 Q. HAS BELLSOUTH INITIATED THE SOLICITATION OF CUSTOMERS  
21 WHO HAVE SWITCHED SERVICE FROM BELLSOUTH TO ACCESS  
22 ONE IN VIOLATION OF ITS RESALE AGREEMENT WITH ACCESS  
23 ONE?

24

25 A. No.

1 Q. WHAT DOES BELLSOUTH DO WHEN A BELLSOUTH END USER  
2 SWITCHES TO ONE OF ITS RETAIL COMPETITORS, SUCH AS  
3 ACCESS ONE?

4  
5 A. When a BellSouth end user switches to a retail competitor, such as  
6 Access One, a BellSouth vendor mails a notification letter to the end  
7 user. The letter advises that end user that his/her request to switch  
8 local service has been completed and that BellSouth hopes to have the  
9 opportunity to serve the customer in the future. This notification is  
10 mailed after the completion of changing the service from BellSouth to  
11 that of an ALEC.

12  
13 Q. DOES THIS NOTIFICATION LETTER CONSTITUTE A  
14 SOLICITATION?

15  
16 A. No. This letter is system-generated for all customers who switch their  
17 service. It is intended to end a business relationship on a positive note,  
18 to serve as a positive notice from BellSouth to its customers that a  
19 change of service providers has occurred, and to provide a contact  
20 number if customers have any questions. It contains no special offers  
21 or incentives that would encourage the customer to return to BellSouth.  
22 The letter also serves as a safeguard that slamming (switching a  
23 person's telephone service to a different company without his/her  
24 knowledge or permission) of the end user has not occurred.

25

1 ISSUE 3

2 Q. HAS BELLSOUTH PROVIDED TO ACCESS ONE THE REQUIRED  
3 NOTIFICATION OF CUSTOMERS' CHANGES OF LOCAL SERVICE  
4 PROVIDERS PURSUANT TO THE RESALE AGREEMENT BETWEEN  
5 BELLSOUTH AND ACCESS ONE?

6  
7 A. Yes. BellSouth has designed a process to automatically produce  
8 letters of notification when an ALEC customer switches to BellSouth for  
9 provision of local telephone service. The process is such that daily,  
10 after all the Service Order Control System ("SOCS") orders are  
11 completed, a file is generated based on the Disconnect Reason Code  
12 ("DCR"). This information is then sent electronically to the third-party  
13 vendor to generate the "Change of Carrier Notification" letter. With  
14 minor exceptions, BellSouth believes the process has and is operating  
15 as designed. In late spring or early summer of 1998, some ALECs  
16 indicated to their BellSouth Customer Service Managers (CSMs) that  
17 they were not receiving "Change of Carrier Notification Letters." The  
18 CSMs passed this information to the Local Carrier Service Center  
19 ("LCSC") staff who in turn conducted an investigation to verify the  
20 sufficiency of the existing processes and to identify any gaps. This  
21 investigation continued into the fall of 1998, due to the complexity of  
22 the process and the involvement of several internal departments and  
23 third-party vendors. The LCSC staff was able to determine that on  
24 certain orders, involving only business customers returning to  
25 BellSouth, the ALEC address information was not being properly

1 formatted on the disconnect service orders. When an attempt was  
2 made to pass the mailing information to the third-party vendor (who  
3 generates and mails the actual letter), an error condition resulted. By  
4 November 1998, the LCSC staff had developed and implemented a  
5 manual work-around procedure. An additional safeguard was also  
6 developed in January 1999, and that additional safeguard has been  
7 successfully implemented. In short, this additional safeguard is such  
8 that the LCSC will manually handle an error list. This means that if  
9 there is insufficient information that prevents the third-party vendor from  
10 sending the "Change of Carrier Notification Letter", then the LCSC will  
11 send out the letter based on the error list (which is pulled daily).

12

13 At present, Access One should be receiving "Change of Carrier  
14 Notification Letters" on all accounts that switch from Access One to  
15 another Local Service Provider (LSP). On February 3, 1999, BellSouth  
16 wrote Access One notifying it that corrective action had been taken and  
17 asking for any recent examples of letters not being received. To date,  
18 Access One has reported no such examples or problems to BellSouth.

19

20 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

21

22 A. Yes.

23

24

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