

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of : **UNDOCKETED**
:
Status of operational :
support systems. :

VOLUME 3
Pages 367 through 514



PROCEEDINGS: WORKSHOP

BEFORE: CHAIRMAN JOE GARCIA
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER JULIA L. JOHNSON
COMMISSIONER E. LEON JACOBS, JR.

DATE: Wednesday, May 6, 1999

TIME: Commenced at 9:30 a.m.
Concluded at 5:35 p.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: H. RUTHE POTAMI, CSR, RPR
KIMBERLY K. BERENS, CSR, RPR
FPSC Commission Reporters

IN ATTENDANCE:

(As heretofore noted.)

DOCUMENT NUMBER - DATE
06356 MAY 20 88
FPSC-RECORDS/REPORTING

I N D E X

MISCELLANEOUS

3	ITEM	PAGE NO.
4		
5	PRESENTATION BY MS. WELCH TCCF	402
6		
7	PRESENTATION BY MR. ROADERICK SEACLEC and Alternative Phone	424
8		
9	PRESENTATION BY MR. MCGUFFIE SEACLEC and NOW Communications	433
10		
11	PRESENTATION BY MR. GILLAN FCCA	442
12		
13	PRESENTATION BY MR. MINNIG KPMG	461
14		
15	PRESENTATION BY MR. DELATOUR WORLDLINK	491
16		
17	PRESENTATION BY MR. KLEIN American Dial Tone	500
18		
19	CERTIFICATE OF REPORTERS	514
20		
21		
22		
23		
24		
25		

P R O C E E D I N G S

(Workshop reconvened at 1:30 p.m.)

COMMISSIONER DEASON: We'll reconvene the workshop.

I believe our next presenter is Supra. And just for introduction, let me indicate, as everyone is probably well aware, we're running about 45 to 50 minutes behind schedule, and we've had one other presenter who would like to make a presentation who is not even on the list; and so we need -- to the extent that we can be concise and not replot ground that's already been plowed, I would request that people take that into consideration.

And with that, Supra?

MS. BENTLEY: Okay. Can you hear me?
Great.

I'm Carol Bentley, the vice-president of operations for Supra Telecom out of Miami, and I'm going to be talking to you about the same kinds of thing that Jay and Brian have been talking. It almost seems like we could have planned this.

I don't think we could have planned it better if we tried, because Jay focused on TAG, and Brian seemed to focus a lot on EDI, and I'm going to focus on LENS.

1 I'm going to take you through very briefly
2 some highlights of the issues and problems we're
3 having with LENS and TAG, and then what I've brought
4 for you to look at is an off-line demo of LENS. I'm
5 going to take you through what CLECs and ALECs have to
6 go through to get a new service order processed
7 through LENS.

8 I understand from your publications you were
9 looking for a very specific transaction oriented
10 input, so that's what we brought for you. I think
11 you'll enjoy it. Go ahead.

12 Just as an introduction, as you know, today
13 more than ever before, OSS are one of the most
14 important means for service providers to gain and
15 maintain market share and compete effectively in any
16 utility market.

17 Also, one of the issues we're grappling with
18 is the ILECs have been required to provide access to
19 their OSS on a par that they use internally. They're
20 required to provide ALECs OSS that is at least equal
21 in quality to that which it provides itself or any
22 affiliate or any other carrier with which it
23 interconnects. Okay. Enough of the apple pie and
24 motherhood.

25 The two systems available to Supra right now

1 are LENS and TAG. We've been using LENS for quite
2 some time, and we're in the midst of implementing TAG.

3 Go ahead. One more. (Indicating)

4 I'm going to highlight just a couple of
5 things that we have issues with TAG at a high level.
6 The customer record in LENS is generally not updated.
7 After we switch a BellSouth customer to Supra to be a
8 Supra customer, that record is not updated for one to
9 two weeks, so there tends to be a lot of confusion
10 when customers are calling between BellSouth and Supra
11 as to who they belong to. That's one of our issues.

12 Another issue is the due date calculation,
13 and you'll be able to see this a lot better when we
14 get into the demo portion, and the difficulties the
15 Supra's CSRs have in trying to negotiate service
16 dates. LENS precalculates a due date based on the
17 type of order.

18 In terms of the service order logging, LENS
19 does not give us the ability to view the order after
20 we've entered it. So we typically have to print those
21 out and keep them in a file to refer to.

22 You've all heard lots about on-line error
23 checking capabilities. This is probably our most
24 significant problem, and we've talked a lot this
25 morning about rejected orders and orders put in

1 clarification. And it's our opinion that the single
2 biggest contributor to that is the lack of on-line
3 edit checking, and you'll see more what I mean by that
4 when we get into the demo.

5 The second biggest cause of order rejects,
6 in our experience, is the lack of good address
7 validation in LENS. And again, you'll see more of
8 that when we get into the demo.

9 There's the ability to have duplicate
10 orders. When you enter an order at the same service
11 address, LENS doesn't come back and tell you there's
12 already an order out there; are you sure this isn't a
13 duplicate. So very often we have duplicate orders
14 being processed.

15 There's no ability to do any kind of credit
16 verification. We know that RNS provides a certain
17 level of credit checking or credit rating for the
18 customers that their CSRs are dealing with, and LENS
19 does not provide that ability.

20 And lastly --

21 **COMMISSIONER CLARK:** Is that a requirement
22 that -- I mean, is it your position that that is a
23 requirement to be provided by OSS?

24 **MS. BENTLEY:** Yes, it is. To me, that's a
25 part of OSS. It's all part of processing an order.

1 It's all the information you need to be able to
2 process an order.

3 **COMMISSIONER CLARK:** Why is it part of
4 processing an order? I mean, the order can go through
5 without the credit verification. That's something you
6 would -- (inaudible overlap) --

7 **MS. BENTLEY:** Well, you need to be able to
8 determine whether or not a deposit is required.

9 **COMMISSIONER CLARK:** Well, why can't you
10 contract with another agency to -- (inaudible
11 overlap) --

12 **MS. BENTLEY:** We absolutely could. We
13 absolutely could, and that would be an alternative
14 most definitely.

15 **COMMISSIONER CLARK:** Well, it strikes me
16 those things, the other things are unique to providing
17 telephone service and getting it from BellSouth, my
18 question, and they use somebody else to do the credit
19 verification. So I guess -- (inaudible overlap) --

20 **MS. BENTLEY:** Well, they have their own
21 internal history of their own customers. And one of
22 the things that we find is, delinquent customers with
23 BellSouth have large outstanding balances with
24 BellSouth and they'll try to come to one of the CLECs
25 to be able to get service because they're being cut

1 off; and we would like some sort of notification of
2 that as part of the order processing.

3 But you're right. That one is definitely
4 debatable on whether it really falls within OSS or if
5 it's the responsibility of the CLECs to manage that
6 process. Given it was the CLECs' issue to handle, one
7 of the problems with LENS, as the other folks
8 mentioned this morning, is because it doesn't
9 interface with something else, you can't make it
10 interface to something else.

11 It's a very cumbersome process to then have
12 this other system that you have to log into in the
13 middle of the order processing to try to get that
14 information, so -- and the last thing --

15 **COMMISSIONER JOHNSON:** On the point of
16 duplication of orders -- and you said you can't tell
17 the if an order was previously placed. That, I don't
18 necessarily understand what's happening there. You
19 mean if you've already signed up that customer --

20 **MS. BENTLEY:** No. We have maybe a trouble
21 order at an address, and you've entered the order and
22 it goes through; and perhaps a day or two has gone by
23 and the problem is not resolved and the customer calls
24 back.

25 You don't know that there's already a

1 trouble order entered at that address, so you go ahead
2 and you process another one, and then you get multiple
3 duplicate service orders at a single address.

4 **COMMISSIONER JOHNSON:** And I guess in that
5 vein, if a customer wanted to call to check on the
6 status of work done, there's no kind of file that you
7 could pull up that account and say, yes, so-and-so was
8 out there yesterday and -- (inaudible overlap) --

9 **MS. BENTLEY:** That's correct.

10 **COMMISSIONER JOHNSON:** -- you can do none of
11 that.

12 **MS. BENTLEY:** You have no ability to do
13 that.

14 **COMMISSIONER JOHNSON:** And how do you find
15 out now if, say, it was a troubleshooting and there
16 was some request for repair? What would you do? You
17 would have to pull it up and then call Bell --
18 (inaudible overlap) --

19 **MS. BENTLEY:** Call BellSouth.

20 **COMMISSIONER JOHNSON:** -- and then they
21 would have to pull it up on their system to determine
22 what -- (inaudible overlap) --

23 **MS. BENTLEY:** Correct.

24 **COMMISSIONER JOHNSON:** Okay. Thank you.

25 **MS. BENTLEY:** And the last item on my list

1 is service negotiation. When we're working with LENS,
2 we're presented with all of the available products,
3 not just those products and services that pertain to
4 that particular order, whereas in the RNS system
5 they -- the customer service rep is just looking at
6 the specific products that pertain to that type of an
7 order.

8 So it's difficult to -- and it's also a big
9 reason for order rejection when you select -- you're
10 allowed to select certain products and services off
11 the LENS product listing and the order goes through
12 fine, and you find out three days later that service
13 isn't available on that order, and you start over
14 again and you get a new due date out another three,
15 four days. You'll see the screens in just a minute.

16 **COMMISSIONER JOHNSON:** Let me -- and we'll
17 see the screens, and that will be really helpful. But
18 you'll have an array of services that -- so your
19 service person is sitting there telling the person,
20 oh, you can order call waiting, call forwarding,
21 whatever, whatever; they place the order, but those
22 services may not be available for that particular --
23 (inaudible overlap) --

24 **MS. BENTLEY:** Correct. There's multiple
25 flavors of all those things. Some of them are

1 available for resale, some of them are not, although
2 they all appear --

3 **COMMISSIONER JOHNSON:** On the screens.

4 **MS. BENTLEY:** -- on the screens.

5 **COMMISSIONER JOHNSON:** Okay. Thanks.

6 **MS. BENTLEY:** Okay. So we've had a lot of
7 problems with LENS that you'll see in more detail in a
8 few minutes.

9 So the other thing is the biggest -- one of
10 the biggest problems we have with LENS is the speed of
11 the screens. It takes our screens between 30 and 60
12 seconds to populate per screen, so it's so slow we
13 cannot take a customer order with the customer on the
14 phone.

15 So when the customer calls, name, address,
16 services you want, history, and so forth; okay,
17 goodbye, I'll have to call you back. Then we dial
18 into LENS and have to enter all this information. And
19 very often you'll come up with things that you need to
20 know that you didn't happen to ask the customer, so
21 you call the customer back. "Well, what about this
22 and what about that." "Okay; I'll call you back."
23 You're back into LENS.

24 So because of the speed of the screen
25 populations, we have to do it off line. So that is

1 the biggest reason why we started pursuing TAG. We
2 were told that TAG would be a much more responsive
3 system because it's front-ended by something that's
4 called LAN to LAN. We purchase a dedicated T-1 from
5 our office to the BellSouth Miami office to access
6 their LENS system.

7 So at a minimum when you sign up for LAN to
8 LAN, you can have LENS through LAN to LAN, but
9 supposedly at a much higher speed. We've been in
10 testing on that for two weeks now, and we can't get it
11 to respond any faster than our ISDN dial-up mode of
12 LENS.

13 And our feeling is that while we invested
14 significant money to buy this T-1 between our office
15 and BellSouth, that's not where the BellSouth data is.
16 The BellSouth data is in Atlanta or Birmingham or
17 wherever their data center is.

18 So I'm at the mercy -- I've got a nice, fast
19 pipe between Supra and BellSouth in Miami, but I don't
20 know how fast the pipe is or how big the pipe is
21 between Miami and their data center. So what our
22 experience has been over the last two weeks is that
23 it's no faster than our local dial-up ISDN connection.

24 So we're very disappointed about that. But
25 we're working with BellSouth technicians to try to get

1 to the bottom of what's causing that slowdown. I
2 think they -- they indicated to us that they expected
3 it to be much faster. So we're trying to work through
4 those issues.

5 So the other things we've found with TAG is
6 it's expensive. I know AT&T didn't view TAG as
7 expensive in a way that they viewed EDI. However, to
8 a small CLEC company, these dollars are significant.
9 We've spent \$15,000 on hardware and software on both
10 ends, BellSouth's end and Supra's end. We've spent --
11 or we're about to spend \$50,000 to have the interface,
12 the GUI interface, developed. That does not come with
13 TAG. You have to do that on your own.

14 Every CLEC that signs up for TAG has to
15 build their own interface, which in effect is you're
16 building your own LENS, your own version of LENS.
17 Rather than having it built once and available for
18 everyone to use, the idea is that everyone build their
19 own. And it's very expensive, and it's -- my latest
20 quote that I got earlier this week was \$50,000 and two
21 to four months' time.

22 So the timing has been rather painful. And
23 that's the next bullet up here, the development time.
24 We began pursuing TAG in February. I sent some of my
25 guys up to Birmingham for training for TAG in

1 February. We only got the system up in test mode last
2 week. So February, March, April; three, three and a
3 half months it's taken us to get this far, and that
4 doesn't count the time that it's going to take me to
5 develop this user interface that is required. So for
6 a small CLEC that's very painful.

7 **COMMISSIONER JOHNSON:** Could you -- you've
8 stated that each CLEC would have to develop their own
9 interface. Could CLECs decide to share?

10 **MS. BENTLEY:** Yes, they could.

11 **COMMISSIONER JOHNSON:** So that -- just
12 because I don't understand the technology -- say,
13 Supra made the investment. Could you then, for lack
14 of a better -- lease it out or share the expense or
15 something?

16 **MS. BENTLEY:** Yes; and there's a little
17 cottage industry starting up now of companies trying
18 to do that, and we're trying to evaluate the cost of
19 that versus this quote that I've gotten from an
20 application --

21 (Telephonic static interference.)

22 **COMMISSIONER JOHNSON:** Hold on one second.
23 She can't --

24 (Telephonic static interference continues.)

25 (Pause in proceedings.)

1 **COMMISSIONER JOHNSON:** You were talking
2 about sharing --

3 **MS. BENTLEY:** The developer that we got the
4 quote of the \$50,000, there's other companies that
5 claim to sell an office shelf type product, but I
6 suspect they're going to be even higher. So I suppose
7 you could try to share with CLECs or try to make
8 deals, but it's asking a lot to think that a group of
9 competitors is going to get together and share, but
10 yes, it's of course, possible.

11 **COMMISSIONER JOHNSON:** Okay. You said that
12 is occurring --

13 **MS. BENTLEY:** No. There's cottage industry
14 companies coming up trying to develop these systems
15 and at least avoid the two to four-month development
16 time that I'm facing, but they're also very expensive.

17 Okay. Let's start the demo of LENS. I
18 would love to have done this on line. I didn't see
19 how that was possible, so we just did screen prints of
20 every page that we're going to have to go through to
21 enter a new service order.

22 This first screen you have to choose -- you
23 have to choose what type of an order it is. This is a
24 new installation. Residential and -- go ahead -- and
25 you will have that other arrow. You have to choose

1 whether they're north south or southeast.

2 First of all, I haven't asked the person
3 their address or name, so I guess I better do that.
4 No place to input it. And then I have to figure out
5 is Miami southeast or south, is Palm Beach south or
6 north. I guess you're supposed to know this.
7 Southeast in fact is Broward and south is Dade. I
8 would intuitively think it was the other way around,
9 but that's just a little oddity.

10 Go ahead.

11 Now we can enter the address. So I guess
12 I've got to ask him what his address is again, and the
13 way we enter the address on this screen is very
14 awkward. His address is 7880 Southwest 127th drive.
15 The way we have to enter it is 7880 first, the 127th
16 next, then the SW and then the Drive. So our folks
17 tend to make a lot of mistakes and stumble over this,
18 and on the RNS system they have a single line where
19 they type in the address.

20 I think you saw some RNS screens yesterday.
21 BellSouth showed them. I looked at them in some of
22 their presentations. And they are able to enter the
23 address naturally, so it reduces errors.

24 One of the things we've been talking about
25 is address validation. Down here it shows that this

1 is a valid address. It already has two lines working
2 and one line not working. If the customer had told me
3 that it was Southwest 127th Circle and that address
4 didn't exist and I typed it in, I don't get choices.
5 I get a response back that says "no such address".

6 So I have to try to troubleshoot by guessing
7 and reentering. On the RNS system they -- when they
8 enter an address that's questionable, they get a
9 selection, a series of addresses to choose from, to
10 validate with the customer. We have to make multiple
11 guesses here to get it to come up properly, and keep
12 in mind that each one of these screens every time we
13 do that takes 30 to 60 seconds. So I've got the
14 customer on the phone. "Oh, sorry your address isn't
15 valid. Let me try something else."

16 Let's see how long 30 seconds is. (Pause)
17 "How's the weather in Miami?" "Systems are slow
18 today." "Apologize for this."

19 I won't agonize you any more. That was only
20 25 seconds. We wait 30 to 60 seconds for each of
21 these screens. That's why we do it off line and try
22 to finagle the other one with the customer off the
23 phone.

24 Next screen.

25 This is the number selection part. We

1 generally only have the opportunity to do random
2 numbers. I don't know if this is necessarily a
3 problem with BellSouth or LENS. I think it's the
4 shortage of numbers in this part of the -- southern
5 Florida right now. The vanity numbers and speciality
6 numbers are just not available. So anyway, we can
7 only choose the random numbers. However, RNS has a
8 much better ability to choose numbers.

9 Go ahead and flip that.

10 We see -- what is that? About 10 or 15
11 numbers? I guess it displays 20 numbers that we can
12 choose from, and for us one of the problems is when we
13 pick one of these numbers and put it over in the
14 column, they're not always available, because the
15 number selection is not updated in BellSouth's
16 databases. So while I've selected it, 10 minutes
17 later a BellSouth CSR can select the same number, so
18 my order rejects. They call me back and say, "Sorry,
19 that number is already taken; choose another."

20 I choose another. I have to call my
21 customer back, say, "Oh, remember that number I gave
22 you? It's no good any more. I have to give you a
23 different one." Meanwhile, the customer has told all
24 of his friends and family, this is my number.

25 They don't like it. They get very upset

1 with us. They think we don't know -- they get the
2 impression we don't have any clue what we're doing,
3 and in a couple of cases it's caused the order to
4 cancel.

5 **COMMISSIONER JOHNSON:** Tell me why this
6 happens again. You say you can select a number, but
7 it's not realtime or something?

8 **MS. BENTLEY:** Exactly. It's not reflected
9 in the BellSouth system that this number has been
10 reserved or selected.

11 **COMMISSIONER JOHNSON:** And what's the lag
12 time?

13 (Telephonic interference.)

14 **MS. BENTLEY:** To tell you the truth, I'm not
15 sure.

16 **COMMISSIONER JOHNSON:** Okay.

17 **MS. BENTLEY:** We get rejected -- you know,
18 when the order gets rejected, which would be two,
19 three days later -- typically, our order is when we
20 get -- when they're rejected or sent in for
21 clarification, they come in on a due date. We're not
22 notified prior.

23 I think you heard -- who was it -- Brian --
24 talk about the notification time on reject or
25 clarifications being several days. That's also our

1 experience. So it's several days later that then we
2 have to choose a new number.

3 **COMMISSIONER JOHNSON:** Okay.

4 **MS. BENTLEY:** Then we go to this next
5 screen, and right here it asks me to select my
6 reserved telephone number. And my little nit-picky
7 gripe here is I've already selected on the previous
8 page; why are you making me select it again and wait
9 another 60 seconds for another page to come up.

10 Okay. Go ahead.

11 This is where we select our long distance
12 carriers. This section works pretty well for us.

13 **COMMISSIONER CLARK:** Let me ask you a
14 question. When you said you have to select it again,
15 do you have to type it in, or can you transfer your --

16 **MS. BENTLEY:** No. You just check that
17 little box and hit "enter" again and then have to wait
18 for the screen to refresh itself.

19 **COMMISSIONER CLARK:** Okay.

20 **MS. BENTLEY:** This is where we pick our long
21 distance carriers, and like I say, this function works
22 pretty well. You can only autopick the LPIC. The
23 carriers you choose only show up in the second box,
24 not in the first box. You have to type in manually in
25 the first box. I don't know why that is. It's just a

1 little system glitch.

2 Okay. Go ahead.

3 **COMMISSIONER CLARK:** Would you just repeat
4 what you just said?

5 **MS. BENTLEY:** You want to go back. Hit the
6 back space.

7 We can only -- we can only autopick from the
8 list for the LPIC. You can't for the PIC.

9 **COMMISSIONER CLARK:** And LPIC, is that
10 interLATA?

11 **MS. BENTLEY:** LPIC is intraLATA, and PIC is
12 interLATA.

13 **COMMISSIONER CLARK:** Okay.

14 **MS. BENTLEY:** Okay. This is one of the
15 screens. This is the first of the product screens.
16 And like I was saying before, you see the little check
17 boxes up there, and this is like -- it's harder to
18 show on this kind of a scene, but it's pages and
19 pages. You scroll through all these pages of products
20 and features where they have little check boxes, and
21 you can check any one of them.

22 And a lot of them -- let's see; three-way,
23 speed calling -- these don't look very similar, but on
24 some of the pages the products look very similar; and
25 I think I have a couple examples coming up. But you

1 can pick any one of those, and if they're not
2 available for resale or they're not available in that
3 customer's area, your order rejects; not when you send
4 it, but of course, three, four days later, and then
5 you start all over again.

6 **COMMISSIONER DEASON:** Does BellSouth provide
7 you some master list of what's available where?

8 **MS. BENTLEY:** If they do, I'm not aware of
9 one.

10 **COMMISSIONER JACOBS:** That's the features
11 database, right?

12 **MS. BENTLEY:** Features?

13 **COMMISSIONER JACOBS:** There is a features
14 database, but it's not in LENS?

15 **MS. BENTLEY:** It's not part of LENS.

16 **COMMISSIONER JACOBS:** Right. I think it's
17 in TAG or something.

18 **MS. BENTLEY:** Go ahead.

19 These are just some of the -- call
20 forwarding, don't answer; these are subsets of voice
21 mail. (Indicating)

22 And I guess one of the points I wanted to
23 make here was when the BellSouth CSR is working with
24 RNS, if you order -- if you're ordering memory call,
25 then what comes up automatically is just these memory

1 call related features, whereas we have to look at
2 everything; we have to look at memory call and
3 three-way dialing and all of the calling features on
4 one screen.

5 Okay. Go ahead. (Indicating)

6 Go ahead. (Indicating)

7 Again, it's just -- it's pages and pages
8 that we scroll through.

9 Go ahead.

10 Okay. This is another one of those screens
11 that is inserted that we just say "yes" to continue,
12 that just is another 60 seconds that I have to wait,
13 so we push "yes" to continue.

14 Go ahead.

15 And now I'm in the administrative section,
16 and this screen has a lot of boxes on it. There's
17 only two things we fill out on here. We fill out a
18 P.O. number and we fill out a desired due date.

19 Oh. And we also always check the expedite
20 requested "yes" box, even though we know it does
21 nothing. We call it -- the CSRs laugh about it. They
22 call it their placebo expedite box, so they always
23 check that.

24 And we're not sure what the date for them
25 is. This is an example of formatting in a field that

1 will cause an order to reject. In most systems that
2 have fields like this that have specific format
3 requirements, you'll see underneath the field "month,
4 month, slash, YY," or "month, month, DD, YY" to show
5 you that -- how you're supposed to enter that date.
6 And there is no formatting on here, and that -- the
7 way this CSR entered it, as you'll see later, is
8 invalid.

9 All this other information down here has to
10 do with whether or not I'm authorized to be using the
11 system. I have a log-on and a password and an
12 exchange agreement contract. So I don't know what
13 this is all here for, and we don't use it, but it's
14 cluttering up our screens.

15 Go ahead.

16 On this screen we're verifying the billing
17 address, which in the case of a CLEC would be Supra.
18 This is our billing account number. And this is a
19 little oddity; the account number starts with 305.
20 However, if I'm selling to a customer in 954 or 561, I
21 have to remember to go in here and change those first
22 three digits to the area code of the person -- the
23 target customer that I'm talking to.

24 It doesn't say that anywhere on the screen.
25 It wouldn't give me an error message if I didn't do

1 it. It would just reject several -- you know, two,
2 three, four days later.

3 Go ahead.

4 This is a screen that's just verifying the
5 Supra contact. This is our internal contact for
6 BellSouth and its comment section here, which we've
7 been told don't bother filling it out because nobody
8 looks at it; so we don't.

9 Go ahead.

10 Now, how many screens have I been through?
11 I lost track, but maybe 10 screens?

12 This is the first time I get to ask what --
13 the name of my customer that I'm talking to. I've
14 been calling him Mr. Customer for the last half hour.
15 This is where we get his -- the customer's name
16 entered.

17 Go ahead.

18 Now, this is another example of formatting.
19 I entered his first name and last name in there, "Fred
20 Ordozi," when it fact it needs to be entered, "Ordozi,
21 Fred," with upper and lower. This will reject, but it
22 doesn't reject it now while I'm entering this order.

23 This telephone number here. (Indicating)

24 Again, what format am I supposed to enter this?

25 Dashes, parentheses, spaces, all together? I don't

1 know.

2 **COMMISSIONER JACOBS:** I thought LENS had
3 editing in it.

4 **MS. BENTLEY:** Pardon me?

5 **COMMISSIONER JACOBS:** I thought LENS had
6 that kind of editing in it.

7 **MS. BENTLEY:** No. You have to know.

8 **COMMISSIONER JOHNSON:** Do they come with --
9 when you -- any kind of instructional manuals, or to
10 tell --

11 **MS. BENTLEY:** It's literally -- it's the LEO
12 guide. It's this big. (Indicating)

13 So our folks have these cheat sheets that
14 print off these screens, and they have just like this;
15 red arrows and notes and -- you know, stuck all over
16 the place. (Indicating) But these are all points of
17 error. These are all places where potential errors
18 happen and orders get rejected. (Indicating)

19 That's why you see the high rejection. You
20 know, I've heard -- I've heard it said this morning
21 that it's training issues. I don't buy that. When
22 you're working with systems that are designed
23 properly, it's not a matter of training people not to
24 make mistakes. You take away the ability to make
25 mistakes with the right systems. They shouldn't be

1 able to make a mistake.

2 Okay. Now, this -- oops. Go back, please.

3 This section down here, the inside wiring
4 option, we don't know why, but if we ever use it, the
5 order rejects, so we don't use it. It's somehow out
6 of sync with LENS, and we've reported this trouble.

7 Okay.

8 Again, this is just another phone number.
9 You're just verifying the phone number for the
10 billing. And, again, it's what format is it.

11 The system is riddled with these strange
12 city abbreviations. MIA doesn't sound too strange.
13 We can figure out that that's Miami. But Pembroke
14 Pines is PMBK PNS, or something like that. And so
15 rather than typing in the city, you need to type in
16 these codes. I have no idea why.

17 Go ahead.

18 This particular screen is for ordering
19 directories. Now, the only thing we can order is the
20 book that is for the exchange that this person is
21 asking for service in. In RNS, the customer can order
22 books from multiple exchanges. Very often Dade people
23 want a Broward directory, and Broward people want Dade
24 books. You have no ability to order different phone
25 books in LENS.

1 This is where you're verifying the directory
2 listing information. (Indicating)

3 **COMMISSIONER CLARK:** I'm sorry. It appears
4 that you do have the ability to order it. You just
5 have to know the city? You have to know the
6 abbreviations?

7 **MS. BENTLEY:** No. This is -- he only gets
8 one listing. This is where he's listed. This is the
9 book he's listed in, and then this is how many books
10 he wants. There's nowhere where you can order books
11 from different cities.

12 **COMMISSIONER CLARK:** Okay. And you say that
13 can be done on RNS?

14 **MS. BENTLEY:** Yeah.

15 **COMMISSIONER CLARK:** Okay.

16 **MS. BENTLEY:** And also the books in RNS can
17 be expedited. You can specify what -- how you want
18 things shipped if you need a book expedited.

19 This is the -- this is more directory
20 verification. Even though we've just done it on the
21 previous page, we do it again here, and then we
22 certify in this little check box here that, yes, this
23 is how you want it listed in the directory. However,
24 this -- you see it's all in upper caps up there. Now,
25 that's incorrect and will cause it to be rejected.

1 The other point that I was making up here
2 is, in RNS, the directory information I think you saw
3 yesterday is right up front when you're getting the
4 customer's name and address. I mean, that's the first
5 two logical things to get from a customer when you're
6 talking to -- even though I don't get it until 10
7 pages into my system.

8 That's the first thing that RNS asks, and at
9 the same time when you're talking address and name,
10 there's the directory information. That's the way RNS
11 works.

12 Here now I'm into it. (Indicating) Now I
13 think I'm asking him for his name and his address for
14 about the third time, so at this point he thinks I'm a
15 complete moron.

16 Okay.

17 This is sort of a strange screen.

18 (Indicating)

19 **COMMISSIONER JACOBS:** Excuse me. As I
20 understand it, if you wanted to put a front end on
21 here that would retain that from screen to screen to
22 screen, you couldn't do that?

23 **MS. BENTLEY:** (Shaking head.) Because this
24 is an application. I don't have access --
25 applications would need an interface. Applications --

1 APIs, they're called, and there is no such thing.

2 It's proprietary. I can't modify this system.

3 That's what TAG is for. That's what
4 BellSouth intends us to do with TAG is to create our
5 own screens with our own edit checking and, you know,
6 our own needs. I think that's exactly what TAG is all
7 about.

8 This screen (indicating), if you didn't
9 choose your products off that other screen that I
10 showed you with all the scrolling down lists of
11 services and features, if you know what your USOC
12 codes are and you don't want to go through and pick
13 those, you can do it here, and you -- but what you
14 have to do first is go to that box and first you have
15 to guess how many features you think you might want to
16 be entering, because you have to -- say, I want to
17 enter 10 features.

18 So I have to enter 10 here and then hit
19 "accept," and then I get a fresh screen with 10 blank
20 boxes. So if I get down to the tenth and the guy
21 wants one more, I've got to go back and start over
22 again; hit 11, 12 or 15 in that box, refresh, get that
23 number of blank boxes. Very awkward.

24 **COMMISSIONER JOHNSON:** And then you'd have
25 to start typing through --

1 **MS. BENTLEY:** And even have to type them all
2 over again.

3 **COMMISSIONER JOHNSON:** What if you hit 20
4 and you only needed 9?

5 **MS. BENTLEY:** No problem. So our people
6 tend to overestimate.

7 Okay.

8 This is the due date that we were talking
9 about earlier, how to determine the due date. Now,
10 remember way back when, I think maybe on the third
11 screen, I entered due date of 5/4/99. That was an
12 invalid format, so it just shows up here as invalid.
13 I mean, that's not so bad. At least my order didn't
14 reject. And here is a case where it actually did edit
15 check on line.

16 So this is good. It told me before I
17 finished my order that I entered that improperly. So
18 I go ahead and change that, but it really has no
19 impact on what -- the due date that this system is
20 going to calculate for me. This system is going to
21 calculate it based on the type of order it is.

22 And I saw in yesterday's presentation of
23 RNS, they had the ability -- you remember that little
24 calendar that came up and you could negotiate the due
25 dates by picking on the calendar of available days

1 based on resources and customer wishes? We have no
2 ability to do that whatsoever in LENS.

3 **COMMISSIONER JACOBS:** You have the same
4 problem of not having a valid date anyway until it
5 gets to SOCS, right?

6 **MS. BENTLEY:** That's right. It's just an
7 expected due date, and then, of course, you still need
8 a FOC.

9 Okay.

10 Now you've hit the button to calculate the
11 due date. It comes up with a due date. And what we
12 find very often is this due date is beyond our
13 contractually agreed upon delivery dates -- or
14 delivery intervals for particular types of service.

15 **COMMISSIONER CLARK:** Your contractual due
16 dates with whom?

17 **MS. BENTLEY:** With BellSouth.

18 **COMMISSIONER CLARK:** Okay.

19 **MS. BENTLEY:** Okay. This order is complete.
20 However, there's a number of things that are in it
21 that are incorrect that will cause it, like I said, to
22 reject or be sent back for clarification. And I'll
23 hear about that three or four days from now.

24 And the length of time: I'd just like to
25 highlight the length of time on the various systems.

1 A BellSouth CSR can process an order, a residential
2 order, in RNS in five to 10 minutes.

3 We recently hired a gal from BellSouth
4 customer service into our own customer service, and
5 she's given us a whole lot of the input on comparing
6 RNS performance and features and ease of use to the
7 thing that she's having to use now, which is LENS. I
8 think she's questioning her decision at this point of
9 coming to work for us, having to use this system. But
10 she's helping us through that, and she said that their
11 goal was to complete residential orders in five to 10
12 minutes.

13 Now, it takes me between 20 and 30 minutes
14 to complete the order just on LENS. That doesn't
15 count time I had to talk to the customer first and
16 write everything down. It doesn't count the time that
17 I have to call them back and get clarification because
18 I didn't get all the information. So a lot of times
19 it can be an hour to process an order.

20 So five to 10 minutes, 30 minutes; I mean,
21 what that's saying is that company like Supra needs
22 five times as many CSRs to process the same number of
23 orders. Are those two OSS in par? I just don't see
24 that. I don't see how that's even close to being on
25 par.

1 And I've told you the difficulty so far
2 we've had with TAG. You've heard about the
3 difficulties from the other gentlemen on EDI as well
4 as TAG. So at this point our suggestion is -- and
5 it's what we've been saying for months and months --
6 is there is an existing OSS that works very well. We
7 all know it works very well.

8 I believe we need access to RNS. Why are we
9 trying to reinvent the wheel? Why are we trying to
10 jazz up these systems that are so broken and aren't
11 working well.

12 I heard the other gentleman talk about, you
13 know, independent auditors and all of this. Well, how
14 long have we been talking about this? We've been
15 talking about this for what; two or three years? Now
16 we're going to be independent auditors for another
17 year?

18 We have a perfectly good working system. I
19 don't see why -- I know it's technologically feasible
20 to segregate different users on that system. So, you
21 know, if there's -- I'm sure there's security issues
22 and who can access what, but technologically that
23 could all be handled. And so our recommendation, and
24 we'll continue to push for access to RNS.

25 Have you more questions?

1 **COMMISSIONER JOHNSON:** Are you all in other
2 LEC areas offering service? By that, do you have a
3 relationship with GTE, Sprint --

4 **MS. BENTLEY:** No, just BellSouth at this
5 point.

6 **COMMISSIONER JOHNSON:** Just BellSouth.

7 **MS. BENTLEY:** Is that it?

8 **COMMISSIONER DEASON:** Does Staff have any
9 questions? (No response.) Okay. Thank you.

10 **MS. BENTLEY:** Thank you.

11 **COMMISSIONER JOHNSON:** I do have one
12 question for her. How long have you all been using
13 the LENS system, how many years?

14 **MS. BENTLEY:** More than a year; maybe two.
15 I'm not sure.

16 **COMMISSIONER JOHNSON:** How long have you all
17 been in operation?

18 **MS. BENTLEY:** Since '93.

19 **COMMISSIONER JOHNSON:** What did you all do
20 before LENS?

21 **MS. BENTLEY:** Fax, and we still fax. The
22 other limitation I should have mentioned with LENS is
23 there's only certain types of orders you can process
24 through LENS. And if you have an order with more than
25 six lines, it has to be fax. You can't accept an

1 order in LENS for more than six lines.

2 **COMMISSIONER JOHNSON:** Then you would fax
3 that order and they would process it?

4 **MS. BENTLEY:** They would process it and you
5 would track -- you do everything on the telephone back
6 and forth to follow up on it.

7 **COMMISSIONER JOHNSON:** Okay. Thank you.

8 **COMMISSIONER JACOBS:** Is there a time
9 differential between that kind of order and the ones
10 you can do through LENS in terms of getting the FOC?

11 **MS. BENTLEY:** The faxed orders take longer
12 because they require yet even more manual handling.

13 **COMMISSIONER DEASON:** Okay. Thank you.

14 **MS. BENTLEY:** Thank you.

15 **COMMISSIONER DEASON:** We'll proceed to the
16 next presentation. Do we need set-up time for the
17 next presentation, or can we go right -- okay. We'll
18 take a five-minute break.

19 (Brief recess.)

20 - - - - -

21 **MS. WELCH:** Again, my name is Andrea Welch,
22 and I'm here from the Telephone Company of Central
23 Florida, and with me I have Cathy Leo who is down here
24 on the end. Cathy is our order provisioning
25 supervisor and one of our primary users, so I brought

1 her along in case there were any technical questions
2 about the system.

3 We're here today to also talk about LENS.
4 We want to try to put our presentation into
5 perspective by saying that we are a small reseller.
6 BellSouth signed a resale agreement with us about
7 three years ago. TCCF is a reseller in the state of
8 Florida for BellSouth, Sprint-United and GTE.

9 We are currently using TAFI and LENS; made a
10 decision conscientiously about a year ago not to use
11 EDI, and are kind of waiting on TAG to see what the
12 performance is like once it's up and running.

13 We use the preordering capabilities of LENS
14 on a consistent basis. I have tell you that in the
15 ordering category that we probably only process about
16 50% of our orders using LENS. And what I'd like to
17 do, if it won't confuse everyone, is kind of reverse
18 my presentation.

19 For those of you who have a handout, if you
20 can go to, I think it's the third -- fourth page in
21 the handout. What I've tried to do -- and this is
22 kind of one of the things that we've wrestled with.
23 Having been a reseller for Bell for the last three
24 years, I can tell you that we have tried LENS probably
25 on three or four different occasions.

1 Each time that we tried it we, for the most
2 part, got frustrated and set it aside and continued to
3 send our orders manually.

4 Again, we're not big. We're not AT&T.
5 We're not MCI. We don't have the kind of volume that
6 they have. And we had gotten into a fairly
7 comfortable rhythm of submitting our orders manually.

8 Because of the possibility of OSS charges
9 being imposed, we've pulled LENS back out, and we have
10 really made a conscious effort to use LENS. What I'm
11 going to try to do here is tell you, based on what we
12 have found, how well LENS does and does not work.

13 The system capabilities -- and this is per
14 screen layouts and product specifications --
15 preordering for LENS is designed to do the following:
16 Address validation, view features and services,
17 reserve telephone number, view installation calendar,
18 view customer record, and calculate due date.

19 Now, I have to tell you that we've been
20 using the preordering capabilities of LENS for
21 probably about a year and, quite honestly, they work
22 pretty well for us. We don't really have any big
23 complaints in the preordering area based on our
24 volume, but when you get into the ordering area we do
25 have some issues.

1 LENS is designed to handle the following.
2 And, again, this is per the screen layouts and the
3 product specifications that have been communicated to
4 us.

5 It's designed to handle new installs,
6 disconnects, conversion "as is," conversion as
7 specified, suspends, restores, white page listing,
8 yellow page listing, change/modify existing service,
9 and this includes add, change and delete of features;
10 change of PIC and an LPIC, change a phone number; is
11 also designed to enter view order status, and that
12 includes firm order confirmation as well as
13 clarifications. So, again, this is what LENS is
14 supposed to do.

15 If you'll go to your next page.

16 This is what we have found -- and I'm
17 calling these exceptions, current processing
18 exceptions. (Indicating)

19 LENS cannot or is not performing the
20 following, and for the most part this is what has been
21 communicated to us by Bell: Convert as specified for
22 an account with more than six lines, cannot do;
23 add/change/delete features for an account with more
24 than six theories; PIC change for an account with more
25 than six lines; add/change/delete hunting; install new

1 line with hunting; to and from when moving an existing
2 line to a new location with the same phone number; and
3 install and add additional line to an existing account
4 and bill to the existing account. A new install
5 creates a separate account. Change password on memory
6 call. You can do no payphone related orders, and most
7 complex orders cannot be processed through LENS.

8 Some of these are very, very key to our
9 operation. Some of our larger customers are payphone
10 vendors. We do process complex orders. The fact that
11 you can't process most orders for accounts that have
12 more than six lines -- I mean, there's some -- for us
13 there's some heavy hitters on that list.

14 In addition to that list, we have found that
15 LENS is not performing the following new installs.
16 And the next three I've asterisked, because Bell just
17 came out with a new release of LENS; it's 5.0. It was
18 introduced on April 25th, and it appears to have
19 perhaps fixed 2, 3 and 4. (Indicating)

20 2 is "conversion as specified". Now, this
21 is a big deal for us, and I have to imagine it would
22 be for everybody in the room. Because we sell local
23 and long distance service, when we move a customer
24 from Bell to TCCF, that new order that we're moving is
25 almost always a conversion as specified or a

1 conversion with changes. So if the OSS won't handle
2 that type of an order, it really leaves us with a big
3 hole.

4 Add/change/delete features: Change a PIC
5 and an LPIC. And, again, it does appear that perhaps
6 5.0 has addressed these three issues.

7 Change of phone number; a white page listing
8 and a yellow page listing. (Indicating)

9 So if you look at everything that is on this
10 page, that is a pretty long list of processing
11 exceptions.

12 Now what I'd like to do is go back, I
13 guess -- and I hope I'm not confusing everyone -- but
14 go back to the beginning of my presentation. And I'm
15 going to try to catch us up.

16 What I tried to do as best I could was back
17 into the guidelines that Staff had given us for
18 presentations. And I'm not going to go through this
19 whole chart unless someone would want me to, but I do
20 want to kind of talk about each of the columns and
21 explain what is in each column.

22 "Transaction Type", again, just backs into
23 the parameters given by Staff. You've either got
24 establishment order or an add/move/change.

25 The next column, "System." In the case of

1 all of these orders, they were all submitted via LENS.

2 Next column "Function Performed." I tried
3 to be as clear as I could as to the type of order that
4 we were submitting.

5 Next few columns, "Method Used." All of
6 these orders were submitted electronically via LENS,
7 so you'll see an "E" in the submit column in all
8 cases.

9 "Process" column: This tells us was the
10 order processed electronically or was it processed
11 manually.

12 Next two columns "Complete Time." The first
13 column is the amount of time that we invested to
14 actually key the order and work the order. First
15 number is the amount of time to key the order. In
16 most cases it's somewhere between three and five
17 minutes.

18 Then I have a plus and another number, and
19 that is the amount of time it took us to work orders
20 that fell into clarification.

21 Now, it's my understanding and -- I mean, if
22 you have some questions we can get Cathy to answer
23 them -- but when an order falls into clarification and
24 our reps have to get on the phone with Bell, sometimes
25 it's one, two, three minutes on the phone. Sometimes

1 they get put on hold for 15 to 20 minutes. So we
2 tried to come up with an average of how long it takes
3 to work a clarification. So that's why I've got, for
4 example, 5 minutes plus 10 minutes.

5 **COMMISSIONER DEASON:** Let me ask a question
6 on that. The 5 is just your input time, and 10
7 minutes in addition for clarification? Is that what
8 that means?

9 **MS. WELCH:** Yeah. We tried because, again,
10 of what Staff had given us that -- they gave us
11 certain parameters of the way they wanted us to
12 present information.

13 We tried to come up with how long we thought
14 it took us to actually sit and key an order, and
15 that's where the 5 comes from, and then we tried to
16 guesstimate how long it takes us to work a
17 clarification.

18 Now, I will point out -- and I apologize --
19 in this column I do have some mistakes, and I did not
20 find them until last night. If you look in the
21 "Comments Column", you'll see a couple places where it
22 says "no problem". In those cases, the work column
23 should say "3 only". There is no plus 10, because the
24 order did not fall into clarification.

25 **COMMISSIONER DEASON:** Well, I'm just trying

1 to reconcile this with what the previous presentation
2 indicated, that it's basically a 30-minute process to
3 enter an order using LENS, and your times are much
4 less than that.

5 Do you have -- and we were told that it's 60
6 seconds just to go from one screen to the next screen.

7 **MS. WELCH:** I'll let Cathy, since she's the
8 user.

9 **MS. LEO:** Hi. The previous person who was
10 up there, they were talking about leaving the customer
11 on the phone with them. We don't handle our customers
12 that way. We don't like to keep people on hold. I
13 gather all the information I need at that time.

14 **COMMISSIONER DEASON:** She indicated --

15 **COMMISSIONER CLARK:** She said they do it
16 separate.

17 **MS. LEO:** Well, I got the impression that
18 they were holding the customer as they were processing
19 the order. Okay.

20 There is a delay from screen to screen.
21 It's an Internet type activity, which it's no
22 different than surfing if you were on the Internet.

23 The screens I go to, I know my codes; I know
24 the USOCs to enter. That's the only thing I could
25 think of why it would be a little bit quicker than

1 what she was saying.

2 **COMMISSIONER DEASON:** What is the
3 experienced time delay from one screen to the next?

4 **MS. LEO:** It varies. It really depends on
5 the system, and because it's Internet, it's difficult
6 to say.

7 **COMMISSIONER DEASON:** Okay. Thank you.

8 **MS. WELCH:** Not to contradict anyone, but I
9 think there are some screens that Cathy bypasses when
10 she goes through the process.

11 So, again, this is not something that we
12 track, this amount of time. We track all of our
13 orders from the time we start to input until the time
14 the order is closed. So it's easy for us to produce
15 most of this information by going back to historical
16 data. We do not time the orders. So this was Cathy's
17 guesstimate of how long it took.

18 The next column is the amount of days it
19 took to work the order from the time we keyed the
20 order and sent it until the time that the order was
21 actually closed.

22 The next column is "service interval guide".
23 This is the number of days that BellSouth quotes in
24 their service interval guide to work the same type of
25 order.

1 And the comments column, I attempted to give
2 you some information without getting very specific
3 about what happened to this order.

4 Now, I said I wouldn't go through the whole
5 form and I won't, but just as an example, the first
6 four orders that were submitted here were all for
7 installs; two for residential lines and two for
8 business.

9 The first order basically fell into
10 clarification. We called the LCSC. We were asked to
11 resubmit the order. And the second item on this log
12 is that new order that we resubmitted. You will
13 notice that in the Comments column over and over again
14 you see "fell into clarification".

15 I mean, Cathy may be able to speak to this
16 in more detail than I can, but it is not uncommon for
17 you to send an order and it just falls into
18 clarification. Then you have to get on the phone and
19 work the order.

20 It does not appear to us that the folks in
21 the LCSC have any idea why the orders fall into
22 clarification. I mean, you can see just in these 29
23 examples that Cathy and her folks got on the phone
24 each time and called the LCSC. There was never any
25 assistance given. There's never any direction.

1 There's never any -- we -- you know, "it happened
2 because". It's just either "We'll work the order for
3 you," and then it flows there manually, or we're told
4 to resubmit.

5 There was a point to time two months ago,
6 month and a half ago, when we could call a help desk
7 and get assistance. I have to tell you that we have
8 had no luck doing that within the last 45 days. It
9 appears that all of the questions related to OSS have
10 been routed to the customer service managers in the
11 BellSouth organization -- not the account team, not
12 the help desk -- the customer service managers, and we
13 have gotten no assistance.

14 Most of these orders fell into clarification
15 based on the same error, and we really don't know why
16 they fell into clarification. Some of the reasons are
17 because of the sheet that I covered earlier where they
18 are true processing exceptions. There are certain
19 orders that LENS cannot process.

20 Now, if we can -- and I know I'm moving all
21 around, but I'm trying to catch us up -- if we can
22 just go to the page that looks like this.

23 (Indicating) And this is just a summary of the two
24 long sheets that were at the beginning of our
25 presentation.

1 We submitted 29 orders via LENS. 100% of
2 those were submitted electronically via LENS. 65% of
3 them, or 19, were processed manually. Flow-through
4 achieved was 31%. Nine of the orders flowed through.

5 Parity achieved -- which means that the
6 order was worked in the same amount of time that the
7 BellSouth service interval guide says it would be
8 worked for their retail customers -- parity was
9 achieved in 59% of the time, 17 of the orders.

10 I do want to point out, though, if you go
11 back to the actual log sheet, the one category that
12 the orders seemed to flow through the best were
13 disconnects. If it had not been for the disconnect
14 category, these numbers would have looked a lot
15 different.

16 Let me find the disconnect. (Pause) We
17 have 9 disconnects that we sent through the system.
18 Eight of them were for residential and business lines.
19 The ninth one was to disconnect an ISDN line. You can
20 see that they were all submitted electronically. One,
21 two, three, four, five, six, seven flowed through the
22 system electronically, and two were processed
23 manually.

24 One of the two that were processed manually
25 was the ISDN line, and that was processed manually

1 because it is a complex order, and we had to resubmit.
2 So if you pull out the statistics on the disconnects,
3 that chart would change dramatically. Flow-through
4 would change, parity would change; the numbers would
5 look quite different.

6 And I guess what I would say in -- we have
7 really tried to work with LENS. There are so many
8 processing exceptions. There are so few times when
9 the order flows through the system and there's so
10 little information and guidance that you can get from
11 the LCSC as to how you can fix your issues. It's just
12 a very difficult situation.

13 I want to point out an example -- and again
14 I'm going to ask you to flip. It's all the way to the
15 back. And I just can't leave without giving this
16 example, because this is a big impact to us, and I can
17 tell you that what's on this sheet is getting ready to
18 happen to our company again tomorrow possibly.

19 I mentioned that some of our largest
20 customers are payphone vendors. Back in February of
21 this year we had a customer that owed us in excess of
22 \$120,000. We sent them a suspension notice. They did
23 not pay their bill, so we prepared to suspend their
24 service for nonpay.

25 We called the LCSC because it was a large

1 order, and we talked to the operations director and we
2 told them that we wanted to submit this order via
3 LENS. We were told we could not submit it via LENS,
4 we had to submit it manually; and we pushed very hard
5 to submit it via LENS, and you'll see why in a minute.

6 We went ahead and sent a sampling via LENS.
7 The operations directors called us back in five
8 minutes and said, this is not going to work, you have
9 to submit it manually.

10 We had to complete two pieces of paper on
11 573 lines to do a suspend. Now, in reality, we
12 couldn't even do a suspend; we had to do a disconnect.
13 Then we had to do four pieces of paper for each of the
14 573 lines to do a reconnect. We had to complete 3,438
15 pieces of paper.

16 We had three service reps pulled off the
17 phone all Friday. They came in and worked on the
18 weekends, and we worked overtime to get the paperwork
19 done. Now, the labor cost is nominal. I mean, it's
20 \$936 plus the time that we spent during work hours.

21 "Service Order Fee." (Indicating) And this
22 is the fee that we are currently being charged. We
23 got charged \$13,179 for working this order in addition
24 to completing 3,438 pieces of paper.

25 The OSS fees that BellSouth would like to

1 impose -- and I know these didn't come up -- but
2 there's two charges that are being proposed. One is
3 manual and one is electronic.

4 And this is my concern: We wanted to submit
5 this order electronically. We were told we could not.
6 If the fees had been in place, we would have paid
7 \$11,505.84 twice. If we had been able to send the
8 order electronically, we would have paid \$3,884.94
9 twice. Processing this order was either going to cost
10 us \$36,190.68 or 20,000 and some change. For a small
11 reseller, that is a lot of money.

12 I have a payphone vendor tomorrow that is
13 due to be suspended. They have 600 lines. For us
14 this is a real problem.

15 So, again, if the OSS don't work, if I can't
16 submit the orders electronically, it really puts me at
17 a disadvantage. I mean, we have been a reseller for
18 three years. We have gotten to the point where we
19 were comfortable doing the orders manually. We didn't
20 like it, but it worked. Now all of a sudden we have
21 to do them electronically. Fine. We'll do that, but
22 it's got to work. And I sure as heck don't want to
23 get hit with these kind of charges.

24 We will implement TAG once we know that it
25 is up and running and functional. I mean, if it gives

1 us advantages over and above where we are, we
2 certainly will move in that direction.

3 But, again, we're a small reseller. We
4 can't absorb the kind of costs that you're talking
5 about for TAG not knowing whether it's really going to
6 improve our situation or not.

7 I'm done.

8 **COMMISSIONER DEASON:** Any questions?

9 **MS. KEATING:** I just have one question. You
10 mentioned you all were operating in GTE territory and
11 in Sprint-United territory. What kind of experiences
12 have you had working through their systems?

13 **MS. WELCH:** Our base right now is probably
14 50% Bell and close to 50% Sprint-United. We do very
15 little business in GTE territory.

16 I mean, I will tell you that we made a
17 conscious decision not to do business in GTE territory
18 about a year ago because we could get nothing
19 provisioned, and it's such a small part of the state
20 that it really wasn't that critical to us.

21 Sprint-United, we don't really have any
22 issues with them right now. We do use IRES. But,
23 again, it gets back to we're a small reseller; we
24 don't have the kind of volumes that some of these
25 folks have.

1 It is possible for us to submit our orders
2 manually. We had gotten to the point -- I guess, you
3 know, some people would say we're fairly aggressive.
4 We got to the point where turnaround on our orders was
5 really not that bad, even though they were being
6 processed manually.

7 I guess the reason we've gotten pretty vocal
8 about Bell is that now on top of the OSS not working,
9 now they want to charge us. That hasn't come up with
10 Sprint yet. If it does, then I guess I'll be standing
11 up here about Sprint, but we don't really have any
12 issues with Sprint right now; and we do use IRES.

13 **COMMISSIONER JOHNSON:** I'm sorry. What was
14 IRES?

15 **MS. WELCH:** IRES is the system that is used
16 to process orders via Sprint-United.

17 **COMMISSIONER JOHNSON:** It's an electronic
18 system? I mean, is that what you're comparing to --
19 do you compare IRES to LENS?

20 **MS. WELCH:** To LENS, yeah.

21 **COMMISSIONER JOHNSON:** So it's an electronic
22 Internet kind of --

23 **MS. LEO:** Right; it's through the Internet.

24 **COMMISSIONER JOHNSON:** And you're saying
25 that in terms of the workability, it's more efficient

1 and effective than LENS?

2 **MS. LEO:** It's less keying involved, quicker
3 time frame turning your order through; definitely more
4 efficient.

5 **COMMISSIONER JOHNSON:** And I guess it's just
6 a decision of the provider as to which system they
7 would have you use, the interface that's available?

8 **MS. WELCH:** The decision of the LEC?

9 **COMMISSIONER JOHNSON:** Yes, the decision of
10 the LEC.

11 **MS. WELCH:** I don't know if the
12 Sprint-United individual is still here. I mean, I --

13 **COMMISSIONER JOHNSON:** I mean, if you all
14 wanted to use IRES in BellSouth's region, is there --
15 I'm just not understanding --

16 **MS. WELCH:** I may be wrong on this, but I
17 kind of have gotten the impression that IRES is
18 Bell -- is Sprint-United's system that they have used,
19 and they have developed the fire walls and allowed
20 entry. And, I mean, that's kind of what a lot of us
21 are saying about BellSouth; come on, guys; you've got
22 two systems that have been in place for at least 10
23 years.

24 **COMMISSIONER JOHNSON:** So making sure I
25 understand again, IRES is like -- is Sprint's own

1 internal system, just as RNS is Bell's; is that --

2 **MS. WELCH:** I believe that is the case. I'm
3 not going to stand up here and swear to it, but I
4 believe Sprint-United has given the resellers access
5 to the system that --

6 **COMMISSIONER JOHNSON:** I see.

7 **MS. WELCH:** -- they use. Whereas Bell has
8 gone off and developed LENS, EDI, and now TAG, as
9 opposed to giving us access to RNS and DOE.

10 **MR. FELZ:** I'm John Felz with Sprint. And
11 IRES is our internally developed application that
12 allows CLECs to, through the Internet, interface with
13 our LEGACY system. So it would be equivalent to what
14 BellSouth has done for --

15 **COMMISSIONER JOHNSON:** RNS?

16 **MR. FELZ:** No, no; for LENS. I'm sorry.

17 **COMMISSIONER JOHNSON:** So -- that's a good
18 clarification, then. It is equivalent to what Bell
19 did for LENS. It's not the equivalent to making RNS
20 available to the CLECs.

21 **MR. FELZ:** That's correct; it is not our
22 LEGACY system.

23 **MS. WELCH:** Okay. I wasn't certain.

24 **COMMISSIONER JOHNSON:** Okay. Thank you.

25 **COMMISSIONER JACOBS:** The product that

1 Telcordia described, I know it's not intended to
2 provide that whole realm of functionality, but are you
3 familiar with that product?

4 **MS. WELCH:** Just through the demonstration
5 yesterday.

6 **COMMISSIONER JACOBS:** Okay. It sounds like
7 the goal would be for it to become somewhat of a
8 bridge that would allow you some of that common
9 functionality, but going to multiple LECs.

10 **MS. WELCH:** Certainly sounded like it, which
11 would be a great solution. But, again, I would have
12 to ask, I guess, the question, what would the cost be.
13 Because, again, I mean, I have 23 employees; I am not
14 a big reseller. I'm not facilities-based. I mean,
15 I'm just kind of pure vanilla.

16 We sell to businesses and residential
17 customers. We cover the entire state, but we're not a
18 large reseller. We don't have those kind of funds.
19 But, again, we will implement TAG once we know that it
20 functions and it will improve our situation.

21 **COMMISSIONER DEASON:** Thank you. We'll take
22 a 15-minute break at this time.

23 (Brief recess.)

24 - - - - -

25 **COMMISSIONER DEASON:** We'll reconvene the

1 workshop.

2 **MS. SUMMERLIN:** Commissioners, what I would
3 like to do is just introduce the next presenters for
4 SEACLEC. I would stand up, but I don't have a
5 microphone attached to me. That's why I'm sitting
6 here.

7 Basically I wanted to explain what SEACLEC
8 is and first of all say, I'm Suzanne Summerlin, for
9 the people who don't know who I am.

10 SEACLEC is the Southeastern Association of
11 Competitive Local Exchange Carriers. We have two
12 presenters this afternoon. Mr. Jeff Roderick is the
13 person standing up front. He is with Alternative
14 Phone. And Charlie McGuffie is to my right here and
15 he's with NOW Communications. And they are going to
16 give the presentations for SEACLEC this afternoon.

17 I wanted to point out just for people that
18 don't know, SEACLEC is a brand new association. We
19 just incorporated in March and we have six members at
20 this point and we are interested in the concerns of
21 start-up CLECs. And these two particular presenters
22 are prepaid providers, but we have other companies in
23 our membership that are not prepaid companies.

24 These companies, obviously, are reselling
25 local service and they're going to share their

1 experiences with the OSS issues. A lot of other
2 members in the group are supportive of the same
3 concerns that they're going to be presenting. I will
4 let Mr. Roderick take it over.

5 **MR. ROADERICK:** I appreciate you letting me
6 talk to you today. Again, my name is a Jeff Roderick
7 and I'm going to give you a perspective on the very
8 small business CLEC environment. Okay.

9 Just to give you a little bit of an idea
10 about me and my company, I'm a small business owner
11 and we're providing prepaid local phone service. Are
12 you all familiar with what prepaid local phone service
13 is? Okay.

14 We've been in operation for about a year and
15 a half now. And we got a little less than 1,000
16 customers. And we've processed over 2,000 orders with
17 Sprint and we've got a little bit of a client base in
18 the BellSouth market. But today I'm going to be
19 concentrating my presentation on the way we order
20 service and how we interface with Sprint. Okay. And
21 my associate, Charles McGuffie, is going to go into
22 the BellSouth interfaces.

23 Okay. Now this is a very simplified diagram
24 as far as the process that we go through to do new
25 service applications as well as move orders. The

1 applications are quite similar as far as the processes
2 that are involved.

3 First we receive an LOA from the customer,
4 which is the letter of authorization, and that letter
5 of authorization is complete with their address, their
6 name, billing address, the features that they would
7 like to have and their signature.

8 And a customer service rep will then type
9 that information into the Alternative Phone software
10 system. Now, this is a custom application that we
11 developed in-house, and what that system does is it
12 tracks the customer in relation to all the orders
13 processed, billing, trouble, as well as management
14 reporting.

15 The customer service rep will enter the
16 order into the API software and then the order is
17 printed. Now, we don't have an electronic interface
18 with Sprint United. Okay.

19 The order is printed off and then the rep
20 will then log on to the IRES system. Okay. And then
21 we go right to doing a preorder for that and we do the
22 address validation.

23 Now, if you notice, I have a couple of items
24 there as far as those are concerns that we have.
25 During the preorder process, the first one says, need

1 tax validation information. Now, what I mean by that
2 is that as a business owner, I've got a fiduciary
3 responsibility to pay taxes. Okay. And I have got no
4 effective, efficient means of validating an address
5 and then getting an indication of whether or not that
6 address is within a particular municipality's tax
7 district. Okay.

8 I have made a request to Sprint as well as
9 BellSouth as to trying to get some sort of an
10 indication when we do an address validation, like just
11 in plain English stating the city limit that that
12 address is within or the county or what have you and
13 not getting much luck.

14 I have experimented on the other side of
15 things as far as getting contacts with the
16 municipalities and trying to get address validation
17 information from them and I'm getting a lot of
18 different responses. I'm actually getting maps of
19 their tax district, tourist maps of their tax district
20 with cartoons characters on it and stuff like that.
21 I'm also getting listings this thick that list all the
22 addresses that are within their tax district. Okay.

23 There are a few that I am getting responses
24 back where I'm getting like an Excel spreadsheet
25 format of all the taxes -- all the streets that are in

1 that tax district. And there is a problem with that
2 as well. The data is not consistent with the data
3 that I have to access to add -- validate an address on
4 the IRES system. Okay.

5 Either the address will validate against the
6 tax validation information, but it's not going to
7 validate against the IRES address validation system.
8 So it's just inconsistent.

9 The ideal situation would be to get that tax
10 validation information in the same place that I am
11 validating the address for telecommunications
12 services.

13 That's a real big issue. We're doing the
14 best we can to pay our taxes to these municipalities,
15 but it's difficult and it's extremely inefficient.

16 Also the second item I have there is need
17 available services. Right now IRES does not tell you
18 the available services for a new install or a move.
19 Okay.

20 There is a lot of problems with this as far
21 as, the way we find out that like caller ID is not
22 available in a particular area is, after the
23 installation has taken place, the customer will call
24 us up, caller ID is not working. We have to then call
25 the NEAC, which is Sprint's equivalent to the LCSC,

1 National Exchange Access Center. Something like that.
2 That's who we have to interface to do all of our
3 ordering processing.

4 And we have to validate with them to see
5 whether or not the order was done properly. And then
6 we have to call the help desk, which is a national
7 help desk, which takes care of all feature concerns.
8 Caller ID is not working, call waiting. They have
9 direct access to seeing what is on the switch and
10 they're going to tell us, usually, it's not on there.
11 Then we have to call the NEAC back and say, "it's not
12 available, please remove it from the billing system."
13 Because still will get billed for that feature, even
14 though it's not even available in that area.

15 So there is three phone calls to resolve
16 that issue because we don't have access to available
17 features for that particular address.

18 And then moving on, we actually take care of
19 putting the order into the IRES system. We'll submit
20 the order and then 24 to 48 hours we will receive an
21 FOC. And on this FOC is the phone number that the
22 customer will have, and on the FOC is the due date
23 that the installation will take place. We don't have
24 immediate access to telephone numbers at order entry.
25 We have to wait one to two days to get the telephone

1 number. Okay. Then usually within three to five
2 business days, the customer will be turned on.

3 Now, if you notice in the installation box I
4 have there, features not getting installed. Features
5 are a great revenue producing item for us, but when we
6 see them on an order sometimes we cringe because 75%
7 of the orders that we place with Sprint that have
8 features on them do not get installed and it takes a
9 lot of follow-up with the NEAC and the help desk, as
10 well as repair, to take care of these issues. For
11 whatever reason, I do not know what it is, they just
12 do not ever get installed.

13 Go to the next one. Now --

14 **COMMISSIONER DEASON:** Excuse me. Sprint's
15 never given you any indication as to why there appears
16 to be a failure in the system in --

17 **MR. ROADERICK:** I call the NEAC and I will
18 ask them. We have identified some problems.
19 Apparently what happens during the installation
20 process is that if there is a problem with a feature
21 getting installed, it will then get outputted to a
22 printer somewhere within the NEAC, and then the
23 problem will have to be dealt with by hand. And we
24 found about six months ago that they were having
25 problems with the printer that these reports were

1 being generated on. But the problem still hasn't gone
2 away. It's even gotten worse over the past three
3 months. We identified the printer problem back in
4 October of last year. So we're having a lot of
5 problems with features.

6 Now, as far as convert orders. We do a lot
7 of convert orders. Due to the nature of prepaid local
8 phone service, a lot of our customers are being
9 converted over from Sprint or other CLECs.

10 Pretty much the same type of a process.
11 Letter of authorization. We enter the order into the
12 Alternative Phone software and then we print the order
13 and we go to the preorder screen and validate the
14 address. And the same issue here. We need tax
15 validation information so I can pay my taxes.

16 And need available services here. This is
17 the only time that you have access to Sprint's
18 available services for that area, is during a convert
19 of a Sprint customer, and that's it. It's the only
20 time that you'll have any kind of idea what features
21 are available.

22 If we're converting a customer from another
23 CLEC, available features are not available for us to
24 see.

25 To the next box there; order entry. Now,

1 there's a lot of confusion as to how convert orders
2 are supposed to be done with Sprint. When we first
3 started processing orders with Sprint they told us
4 that, and this is in regards to converting a Sprint
5 customer who is currently suspended. Okay. We get a
6 lot of those.

7 When we first signed on with Sprint, they
8 said, you must submit -- because they are suspended,
9 you must submit the order as a new installation.
10 Okay. Even though, they're a customer of Sprint. We
11 should be doing it as a convert, but they wanted us to
12 do it as a new installation.

13 So we did that for about six months. They
14 changed the policy. They wanted us to start doing
15 them as converts. And now, over the past few months,
16 they're waffling back and forth between doing them as
17 new installs or doing them as converts. And sometimes
18 we'll send them up as a convert and they'll get
19 rejected. Some will go through okay. Sometimes we'll
20 send them up as a new install. We'll get rejected.
21 Some will go through okay. So there's a real
22 inconsistent policy as far as how they want us to do
23 it. Okay.

24 Now, if we were converting a customer from
25 another CLEC, then we have to do it as a change order,

1 and in comments you have to type in, "convert this
2 customer". Okay. So the whole convert process is
3 very -- it's wide up, open up for lot of mistakes and
4 rejections and we're just asking for a consistent
5 policy no matter who we're converting it from as far
6 as how it's supposed to be done.

7 And the same process as the previous slides.
8 Submit the order. Then we usually get the FOC within
9 24 to 48 hours with the new phone number and the
10 installation date. Same issues here, the features
11 don't get installed most of the time.

12 Change orders, real quick slide here.
13 Pretty much the same type of process. I just wanted
14 to really emphasize that we're really having problems
15 with the available services and the features not
16 getting installed in those two particular areas.

17 And to the next slide. Some additional
18 issues that we have with Sprint is that there is no
19 communication as far as policy or procedure changes.
20 The way we find out is that we just start getting
21 rejects all over the place and we call them up,
22 "What's the deal?" "Oh, we changed this policy." So
23 that's how we find out.

24 And in regards to repair issues, we get
25 notification that a repair ticket has been resolved

1 but there is no detail as far as what has been done to
2 resolve that ticket. When the bill comes around we
3 just start seeing all these charges for premises work,
4 but we cannot go back and do any type of auditing to
5 see what specifically was done so we could possibly
6 challenge or dispute whatever charges that are
7 appearing on our bill. All we basically get is a
8 notification that the trouble was fixed, and we would
9 just like a little bit of detail as far as what
10 specifically was done.

11 And just to kind of wrap things up as far as
12 Sprint is concerned, I do want to say that we started
13 off with Sprint faxing all of our orders. Okay. And
14 the IRES system is a massive improvement over the fax.
15 It does have its deficiencies, but it is a significant
16 improvement. We are getting rejects much quicker. We
17 are getting FOCs much quicker. We are getting our
18 people on a little more quicker. So there are some
19 positives things to say.

20 I'd like to turn it over to my associate,
21 Charles McGuffie, with NOW Communications.

22 **MR. MCGUFFIE:** Good afternoon. My name is
23 Charlie McGuffie. I'm the chief financial officer of
24 NOW Communications. We're located Jackson,
25 Mississippi and we are a prepaid provider in four of

1 the BellSouth states; Mississippi, Louisiana, Alabama,
2 and Tennessee. We are certificated in Florida. We do
3 have resale agreements with BellSouth and with Sprint
4 and we are negotiating with GTE presently. We also
5 provide services in Arkansas, which is a Southwestern
6 Bell territory.

7 We've heard a lot of comments today and
8 negative comments about BellSouth, and I think that we
9 can say that BellSouth has not created that level
10 playing field that they were supposed to do under the
11 Act. And so I'm not going to go into a lot of the
12 things that have already been pointed out.

13 The first thing that I'd like to comment on
14 is the poor service from the LCSC. The reps over
15 there are uninformed and untrained, it appears, and
16 they just are message takers.

17 When we have a problem that can't be
18 resolved we ask to talk to a supervisor. They tell us
19 they can't transfer us to a supervisor. We ask for a
20 supervisor's name. The reps won't give us a
21 supervisor's name, but they will tell us that they
22 will call us back, and that hardly ever happens.

23 One of the big problems that we have is
24 billing disputes. And I'd say probably 35% of our
25 bills have errors. I don't know where the bills come

1 from, but I don't think it's from the regular
2 BellSouth system because, you know, I've been a
3 customer, a personal customer of BellSouth for 40
4 years and I can't ever recall having a mistake, an
5 error on my bill. Yet the bills for my customer are
6 filled with errors.

7 When we do have a billing dispute, it takes
8 three to four weeks to reconcile it, if it gets
9 reconciled at all.

10 Also, we find that on a final bill, when a
11 customer may have been in denial for more than -- went
12 past their billing date, on a final bill all the
13 credits are lumped together so we can't tell if we got
14 credit for this particular customer or not if he was
15 cut off. So, there's some real problems with their
16 billing system.

17 Notification of conversions. This takes two
18 to three weeks. Once one of our customers is
19 converted to another or back to Bell or to another
20 CLEC, it takes two to three weeks for them to notify
21 us and they send a letter saying that they're
22 notifying us of this as an accommodation, but actually
23 in the contract it requires -- or in the resale
24 agreement it requires that they notify us. There's
25 just no time frame. And it would be very helpful if

1 we know that these people are no longer our customers.

2 There are some positive things about LENS.

3 It's really an improvement over the days when we had
4 to submit LSRs by fax and four pages and so forth.

5 And the most disappointing thing about LENS is that
6 ever so often, one of our orders will just disappear.

7 You'll go in 24 hours after it's been submitted and it
8 will just drop out. And so you have to go through
9 that whole process again.

10 Jeff talked about tax information. I
11 haven't run into that too much where I'm located
12 because we have sales taxes that are distributed
13 throughout the state in the states that I operate in,
14 but I understand here in Florida municipalities do
15 have taxes involving communications. I know in Texas
16 they do. And this is a problem. And BellSouth does
17 have that information and it would be very helpful if
18 they would distribute it to the CLECs.

19 Poor communication on procedure changes.

20 Actually, there is no communication on procedure
21 changes. If something comes back to us, and they'll
22 tell us that it was done improperly and we'll ask the
23 LCSC. "Well, you know, how do we know this?" They
24 say, "Well, look on the web page." Well, the web page
25 is several hundred pages. Unless you know what you're

1 looking for you can't find it.

2 To give you a good example of just how --
3 what small things can happen with the LCSC, there was
4 a situation about three or four months ago where the
5 word "none" had been changed to "NA". We didn't know
6 it. We submitted 400 applications and they all came
7 back. And so we finally found out we were supposed to
8 put "NA" instead of "none". We did that. Well, they
9 all came back again because they had changed the
10 procedure again. So, it would be good if we could get
11 some sort of a procedural change notification rather
12 than having to go to the web site.

13 The address validation in rural areas is
14 very difficult, especially in some of the areas that I
15 am in. Some areas don't have 911 yet. And so, we'll
16 have to draw a map or we'll have to tell the
17 representatives how to get to the house. The techs
18 won't go according to directions. If you don't have a
19 911 address then they will not make the attempt to
20 connect it, even though there may have been a phone in
21 that house before through BellSouth. Then we have a
22 real problem with getting them to connect the phone in
23 a rural area that doesn't have 911.

24 **COMMISSIONER DEASON:** You can't give them a
25 former telephone number that was --

1 **MR. MCGUFFIE:** Well, if you can give them a
2 former telephone number, then they can -- it usually
3 works. But if you can't get them -- a lot of these
4 people don't know a former telephone number if they
5 didn't live in that house. But that's a real problem
6 in rural areas.

7 And missed appointments by techs. If I get
8 a telephone through BellSouth they will -- and there
9 has to be a premise visit, then I'm given the option
10 of a.m. or p.m., but with a CLEC, you're given an
11 option of a day, sometime during that day. And then
12 if the tech can't get to that address, they don't
13 notify you. I had one lady who took four days off of
14 work to get service. Techs never showed up. And, of
15 course, she -- they look at us. We're the telephone
16 company, not BellSouth. You can't blame us. You try
17 to blame it on BellSouth but that doesn't work because
18 they paid us the money. So she asked to be cancelled
19 and got a refund and was hooked up the next week by
20 BellSouth. So these sort of things happen and they
21 happen frequently. And so the -- you know, we just
22 need to get -- for them to be more attentive toward
23 our customers.

24 What that does to a small customer -- a
25 small company like us, we're not like MCI and AT&T.

1 When we have a dissatisfied customer, word of mouth
2 gets around and then NOW Communications becomes the
3 bad guy. "I paid them my money. I didn't get
4 service." And this happens all too often.

5 The last thing --

6 **COMMISSIONER DEASON:** Do you have an
7 agreement with BellSouth which indicates whether --
8 some type of a standard that they're going to meet a
9 certain percentage of appointments? Some type of
10 performance standard in your contract with BellSouth?

11 **MR. MCGUFFIE:** I can't answer that. I don't
12 know.

13 **COMMISSIONER DEASON:** Don't know. Okay.

14 **MR. MCGUFFIE:** One of the biggest problems
15 we have is a term called working service. And this is
16 a situation where a customer will change from one CLEC
17 or from one ILEC to another and their service is
18 either working or in denial, but it's not been
19 terminated.

20 And under the agreement, if a CLEC offers an
21 application then BellSouth is suppose to take that
22 as -- that the customer has asked to change. They
23 tell us that that customer has to call the LEC that
24 they are doing business with at present and ask to be
25 disconnected.

1 We had a situation in Louisiana where we
2 signed up about 5,000 customers from a CLEC that had
3 gone under. And BellSouth connected 4,000 of them.
4 And they were very proud that they connected 80%.

5 In the meantime, we had 1,000 people out
6 there who were just irate that they had paid money and
7 couldn't get connected. And, quite frankly, it caused
8 a lot of problems in our office with that many extra
9 telephone calls and so forth. That is one of the
10 biggest problems that we have, is working service.

11 The other items that were addressed by MCI
12 and AT&T and others are very common in the industry to
13 other CLECs that I talked to and so forth. I guess on
14 one side of it, it's a new industry and, you know, we
15 have to grow with it and we're doing the best we can
16 to continue to grow, and we are. We expect to be
17 operational in Florida in June. Appreciate it. Thank
18 you.

19 **COMMISSIONER DEASON:** Let me ask a question.
20 If you know, what has been your experience with LENS
21 in other states as far as the amount of time it takes
22 to process an order?

23 **MR. MCGUFFIE:** You know, LENS is not
24 perfect, but I'll say it's such an improvement over
25 what we were doing. Invalid addresses are the major

1 problem with LENS. The type of customer that we
2 have -- and let me say this. Our customers primarily
3 are customers who have been -- they've been Bell
4 customers at a some point in time.

5 They've either been cut off because they
6 didn't pay the bill, or they have no credit, or their
7 credit is bad, or they can't afford the deposits, but
8 it's -- and so, sometimes our orders are taken in an
9 agent atmosphere. Sometimes addresses don't get
10 written down properly. Sometimes if it's an apartment
11 number, it will be left off and so forth and so on.
12 And these are the major problems with LENS in that if
13 there is an invalid address.

14 But it can also go to the extreme where, in
15 BellSouth's database, if "road" in this particular
16 instance is written "RD" and we enter "R-O-A-D" then
17 it will kick it out. But you have to keep playing
18 with it and maybe you'll come up on the right
19 combination. But abbreviations do play a part in
20 whether or not the addresses can be validated.

21 **COMMISSIONER DEASON:** Any other questions?
22 Thank you.

23 **MR. MCGUFFIE:** Thank you.

24 **COMMISSIONER DEASON:** We'll proceed to the
25 FCCA.

1 **MR. GILLAN:** Good afternoon, I'll try to do
2 this in an accelerated as fashion as I know how to.
3 Our presentation is a little bit different than the
4 ones that proceeded it, because it isn't going to
5 focus on BellSouth or any of the ILEC's particular OSS
6 systems. Instead, it's going to talk somewhat
7 generally about how you could go about developing a
8 third-party process to evaluate their systems.

9 If anything, the past two days would have
10 shown is that this is really complicated. Even if
11 people have the best intentions, it's very difficult
12 to completely restructure an industry and develop
13 operational systems that are nondiscriminatory, both
14 in theory and in effect, and give quite frankly, you
15 know, a very broad range of entrants an opportunity to
16 compete because, as you heard, you know, people have
17 different needs stemming from new entrants to a market
18 who really are only going to win a few customers a day
19 to very large interexchange carriers who are going to
20 entire the market and need to be able to penetrate the
21 local market at something approximating the speed at
22 which BellSouth is expected to penetrate the long
23 distance market.

24 The presentation that I'm going to give you
25 is based off of a White Paper that was prepared by

1 CompTel-Acta, which is the national trade association
2 of competitive carriers ranging from the very, very
3 small to the very, very large.

4 FCCA, which is its more or less state
5 counterpart with that same sort of breadth to
6 membership, has asked us to come down and present it
7 today.

8 Why would you conduct a third-party test?
9 Well, there's really more or less three reasons. The
10 first one is, recognizing that these systems have to
11 work, and they really have to work when they're
12 implemented. Even in the best of systems, if this was
13 a normal commercial relationship between these
14 carriers and the existing carrier, nobody would
15 introduce an operational support system to accomplish
16 the types of things that these people need these
17 systems to accomplish without doing thorough testing.

18 We have an unusual situation here because of
19 sort of the cross-entry provisions of the Telecom Act,
20 which mean not only these have to work, but basically,
21 they have to work at a volume that would support a
22 mature competitive local exchange industry. Because
23 when the BellSouth, for instance, comes into long
24 distance, it's going to come into a market that is
25 fully mature and all the OSS necessary to support

1 their entry into the long distance are out there,
2 they've been operating and they've been debugged for
3 15 years. It's very inexpensive and cheap for them to
4 get into the LD business, to move customers on to the
5 services that they're going to offer and put those
6 services together.

7 It's also a step in the process of
8 confirming compliance with the Act. So, if you have a
9 third party come and help work with designing these
10 things, our feeling is that each of these goals can be
11 achieved more quickly.

12 We've identified some principles. This
13 presentation is relatively high level because the
14 reality is, when you go to conduct an actual
15 third-party test, it is very detail oriented. But
16 some of the high level, the principles that apply and
17 the basic steps are pretty easy to identify and
18 discuss.

19 The first principle is that you should never
20 forget that the goal is to be able to handle
21 commercial volume, not on the level of a couple of
22 thousand a day, but on thousands and thousands of
23 orders a day. Last year something on the order of
24 50 million people changed their long distance carrier.

25 If you're going to have local competition on

1 a scale that is comparable, you're going to have
2 hundreds of thousand of orders processed through these
3 systems in short periods of time.

4 Second principle. Don't place the cart
5 before the horse. Before you can agree upon an OSS
6 system to order and obtain things from the RBOC, there
7 has to be agreement on what they have to sell. It is
8 an unfortunate fact that still three years after the
9 Act there is not agreement on the things that
10 BellSouth is supposed to sell to entrants, but before
11 you can design an OSS system to test how well they can
12 sell things, you have to first have that agreement on
13 what those items are going to be; which network
14 elements, which combinations under what conditions.

15 Test the complete entry cycle. Probably bad
16 phrasing, but the idea here is that in order for an
17 entrant to come into the market they have to be able
18 to not just use the OSS system, but as was discussed
19 earlier in the context of TAG and even EDI, you have
20 to be able to design your interface.

21 So one of the things that a useful
22 third-party test has to accomplish, is that third
23 party has to come into the market just like a de novo
24 CLEC would come into the market with nothing and be
25 able to start out with the documentation that the ILEC

1 provides that identifies, okay, here's how -- here's
2 the specifications you have to design your interface
3 to, so that that third party, that test, can actually
4 go through the process of creating a CLEC interface to
5 interface so that you know that those kind of
6 documents are available.

7 Because maybe AT&T, maybe MCI, are large
8 enough to be able to work through that process
9 iteratively, but most new entrants are going to need
10 complete documentation on the front end so that they
11 can design those interfaces efficiently.

12 **COMMISSIONER JOHNSON:** Mr. Gillan?

13 **MR. GILLAN:** Yeah.

14 **COMMISSIONER JOHNSON:** Item No. 2, don't
15 place the cart before the horse. That's not related
16 directly to the third-party testing. You're saying --
17 and maybe I didn't understand. You were suggesting
18 that you have to know what you're going to subject to
19 this process. You were talking about the unbundled
20 network elements --

21 **MR. GILLAN:** You have to make sure that
22 there is agreement consensus as to exactly what -- for
23 instance, in this case, what BellSouth is going to be
24 obligated to sell entrants.

25 One of the reasons the New York third-party

1 test was finally able to get off the ground was
2 eventually Bell Atlantic threw up its hands and said,
3 "okay, we will offer network element combinations."
4 During that period of time when there was not a clear
5 legal obligation, they negotiated under what
6 conditions they would, but they had to at least step
7 up and say, "okay, under some conditions we're going
8 to sell them, so now we will design an OSS system to
9 provide them to you, and we'll create a system where
10 entrants can come into the market and order it."
11 Because, otherwise, you're playing a very theoretical
12 game.

13 The entrant wants to buy, in this case, the
14 platform. That was the expected mass market entry
15 vehicle. Bell Atlantic was saying they weren't going
16 to provide it. And the question on the table is,
17 well, how do you design an OSS system that will handle
18 commercial volume. Well, they're refusing to sell
19 that which is expected to be the commercial volume
20 entry strategy or the dead lock.

21 Tests must be comprehensive, which actually
22 segues right into this. Has to consider all the entry
23 strategies.

24 Resale network elements individually.
25 Combinations, the ones -- at least the ones that are

1 expected to be wanted by entrants which would be
2 platform combinations, extended links with transport
3 combinations, new data elements, xDSL service. Things
4 that like. So you need to be able to identify each of
5 the strategies that people want so that the test
6 encompasses all of them.

7 Modeling error is critical. One thing a
8 test has to do is it has to make sure that it doesn't
9 just make sure that a perfect order goes through
10 perfectly because in the real world, not orders are
11 going to be perfect.

12 When you're taught how to drive a car,
13 everyone tells you how to drive a car the correct way,
14 but you almost never get in trouble when you drive a
15 car correctly. It's sort of a strange approach to
16 instruction.

17 When you learn to fly an airplane, they
18 spend about 10 minutes teaching you how to fly an
19 airplane correctly and then they spend the rest of the
20 instruction making you do something wrong so you know
21 how to recover.

22 **COMMISSIONER CLARK:** You think that's the
23 right way to teach?

24 **MR. GILLAN:** Well, yeah. Because I've never
25 seen anyone get hurt doing something right, but I've

1 seen a lot of people get hurt doing things wrong. If
2 you're in an airplane, you spend all your time doing
3 things wrong and learning how to recover.

4 OSS testing has to -- really about the same
5 strategy. Has to test both, how do the right orders
6 go through, and also, how do the wrong orders not go
7 through, what is the process of rejection, is the
8 right information provided in a timely manner, because
9 there is going to be some errors.

10 The future is as important as the past. You
11 know, in the three years since the Act was passed,
12 three years ago if you started a third-party testing
13 process, nobody ever would have thought to, "how do I
14 test the delivery of xDSL capable loops? How do I
15 test systems needed to give entrants knowledge as to
16 the spectrum compatibility of those loops so that they
17 can deploy their own advanced data technology?"

18 I think at this point in time third-party
19 tests have to look not just at what are the order
20 processes to get traditional orders through, but
21 pretty clearly, now going forward, they need to also
22 consider how will OSS systems handle spectrum
23 compatibility issues, xDSL compatible loops, whatever
24 other data network elements the FCC orders in the next
25 round of -- in the 319 remand proceeding and the

1 proceeding to look at network elements again. So I
2 think things are going to be a little bit different.

3 And finally, don't expect overnight results.
4 Even in the best of circumstances, this is really
5 complicated. Everyone working together, I don't see
6 any reason why you would expect an OSS test to
7 actually produce satisfactory results in the first go
8 around. It's simply too complicated for that type of
9 test to likely be passed in the first go around. This
10 is going to be on inverted process.

11 In fact, one of the reasons I think you
12 should consider having a third party come in to help
13 in this process, is that the current system of
14 BellSouth makes an improvement and stumbles, causing
15 the entrants to sort of change their systems to
16 stumble forward. This iterative process of trying to
17 refinement is not very efficient. A third party, we
18 think, can accelerate that by bringing people together
19 in a more coop -- hopefully cooperative arrangement.

20 **COMMISSIONER JACOBS:** How do you overcome
21 what I'm perceiving to be a real hesitance by the
22 CLECs to test? It's like they've been burned, so --
23 well, let me not categorize it that way. They've
24 experienced difficulties and they, necessarily, are
25 just backing away. How do you overcome that?

1 **MR. GILLAN:** I think that's why a third
2 party testing does make sense because instead of the
3 CLECs either using up their scarce resources testing,
4 or worse yet, testing it in realtime with their own
5 customers, you have a systematic process identified, a
6 third party comes in. They were in -- they
7 identify -- and we'll go through the steps that you
8 would go through to design one those tests. But you
9 take it out of this range of he said/she said, give it
10 to a third party whose goal is at the end of the
11 process to both tell you whether the systems are
12 working, but just as importantly, to help those
13 systems get defined and operating so that they're
14 valuable to people.

15 **COMMISSIONER JACOBS:** One of the parties
16 indicated that one of the reasons they would consider
17 this is because you do this at commercial volume. Is
18 that --

19 **MR. GILLAN:** Yes. And actually that's a
20 great question because -- go to the last principle.
21 Because this is something that the third-party test
22 can't actually handle.

23 No matter how well you test it, it still
24 isn't going to -- you're still not going to know if it
25 works at commercial volumes in the real world until

1 you have some practical experience. Because I don't
2 think it's possible to design any test that can fully
3 mimic -- you can partially mimic, but to fully mimic
4 the volumes, the diversity, the geographic diversity,
5 unknown consequences of different, you know, demands
6 being placed in the systems at different points in
7 time, at different points in the state, that an actual
8 market condition will supply you.

9 So, it's important to go into this, I
10 think -- or if you're thinking about it with your eyes
11 open, recognizing it will help solve some things, but
12 it can't solve everything. It can't answer every
13 question.

14 Now, in terms of designing a third-party
15 test, we tried to identify sort of at a relatively
16 high level the basic steps. First step, selecting a
17 third party.

18 The reason this is so early in the process
19 is, quite frankly, designing the test that the third
20 party is going to actually accomplish is probably more
21 important than conducting a test itself. You need the
22 third party involved early on because much of the work
23 in getting this operating is the entire pretest
24 process of getting the parties together and going
25 through the remainder of these steps.

1 So, when we -- our advice is, when you
2 select a third party, consider their initial skill set
3 that they would bring, their initial knowledge, but
4 the reality is, it's going to be an educational
5 process for them as well, as they seek input from the
6 actual entrants in the market.

7 Second step, building these interfaces so
8 that the CLEC can process the ILEC orders. We very
9 much support the approach that was taken in New York
10 of what's called a pseudo-CLEC. You don't test the
11 ILEC's ability to handle just orders from those
12 companies that have already built a capability to send
13 them orders. You test the entire ability -- the
14 ability for an entrant to come into this market, take
15 that documentation and build interfaces by having that
16 third party really step into the shoes of a new CLEC
17 entrant and go through that process.

18 Once they've built those interfaces, you
19 also need to assemble the resources needed to conduct
20 a test. What that means is that any third party,
21 they're not going to have a switch. They're not going
22 to have collocation cages. They're not going to have
23 all the resources they need to actually test all the
24 types of orders that are going to be need to be
25 tested.

1 So, it's important to, early on in this
2 process, identify participating CLECs who will make
3 available to the test, space in a collocation cage,
4 cross connects to transmission facilities, switch
5 ports, et cetera, so that you can give the third party
6 actual physical assets that they can use in the
7 testing process to make sure that a customer, when
8 they're converted from this network to an entrant
9 network, they can do that test not just using test
10 facilities that aren't live, but calls can actually be
11 processed, you can see how well numbers reported. In
12 effect, give them the assets that they need in order
13 to act as a pseudo-CLEC.

14 The most boring step in the entire process
15 is defining all the order types that need to be
16 identified that are part of this test. Just going
17 through this exercise on a very high level, trying to
18 come up with a list, it's just volumes. But, again,
19 it's very critical. The only way it can be done
20 effectively is with a third party and with the
21 contribution of all the assembled CLECs that would
22 have -- and the ILECs that would be involved.

23 Define maintenance repair, restoration
24 scenarios. Part of the testing process has to be, not
25 only converting customers, but once customers are

1 converted, mimicking the things that happen in the
2 real world; unexpected service outages, unexpected
3 restoration needs, unexpected repair problems.

4 So part of the entire testing process has to
5 include a period long enough for these test lines to
6 be in service and yet at the same time, have the type
7 of random acts occur to them that you'd expect in a
8 real world scenario or real world environment.

9 Define billing requirements. In addition to
10 testing the LECs ability to deliver network elements
11 to CLEC's delivery sold services, that itself will
12 then create a whole host of billing system changes
13 that need to be tested. Does the ILEC correctly bill
14 for network elements? Does the ILEC correctly bill
15 for resale? And just as importantly, does the ILEC
16 provide the pseudo-CLEC or the third party with the
17 billing information that it's going to need to issue
18 bills to its customers?

19 In particular, when an entrant uses
20 unbundled local switching obtained from the ILEC,
21 they're relying on that ILEC switch to generate all
22 the billing records it needs to bill carriers for
23 access charges, customers for the services they
24 purchase, other carriers for reciprocal compensation,
25 all these ancillary in-store billing capabilities has

1 to be tested to make sure that when network element is
2 actually provisioned and purchased that the entrant is
3 getting what it's expected.

4 Only near the end do you get to the actual
5 conducting the test. We feel that it's necessary to
6 do this for at least three billing cycles to be able
7 to test the robustness of all these solutions as well
8 as wherever there are problems and exceptions, have
9 the ability to go back and retest until things pass.

10 And then finally, comparing test results to
11 performance measures, which is almost an entire issue
12 in itself. But overall -- and I did do it as fast as
13 I thought I could -- these are the steps that the
14 Commission would go through with its third-party
15 vendor to design a third-party test, but it's also the
16 steps that we would encourage you to consider as a way
17 to move this process of OSS development forward.

18 **COMMISSIONER DEASON:** Who selects the third
19 party and how do they get compensated?

20 **MR. GILLAN:** The first question is, the
21 Commission would select the third party.

22 The compensation, quite frankly,
23 Commissioner, I have not put a lot of thought into
24 that. There is a lot of things happening with this
25 third party supplying benefits to a number of parties;

1 the public at large, the ILEC who needs to comply with
2 an act, the entire process of developing those OSS
3 systems.

4 I don't mean to skirt it. I just realize
5 it's a complicated question and it's not one that I've
6 gotten -- put any attention into yet, as much as put
7 in any attention of, can this be done some other way
8 than with a third party, is this iterate process
9 really going to iterate towards a solution or is it
10 just going to iterate to more and more disputes that
11 will require expert resolution.

12 **COMMISSIONER JOHNSON:** Do you know how it's
13 being done or how it's being paid for in New York?
14 You cited to the New York example.

15 **MR. GILLAN:** No, but I can find that out. I
16 don't know how they decided to have that paid for.

17 **COMMISSIONER JOHNSON:** Do you have any
18 opinion as to -- I know that a couple of other states
19 have different types of third-party testing. Any
20 opinion as to which state methodology you would be the
21 most supportive of or is the most effective and meets
22 the basic principles?

23 **MR. GILLAN:** The ones that I'm the most
24 familiar with are New York, Texas and California.
25 Sort of high level. New York was the starting point

1 of this exercise. And just like when you start --
2 when the nation started local competition, we didn't
3 know what we didn't know.

4 When they first created the New York
5 third-party testing arrangement, they didn't know all
6 the things that they would really need to capture. So
7 I think that the -- the New York test, actually is, of
8 those three, the best. And the reason is, first, it
9 was structured on the front end to use this
10 pseudo-CLEC approach. The third party comes in as a
11 de novo entrant, and therefore, tests the value of all
12 the information available to it to build its
13 interfaces, to get connected to be able to process
14 orders. Because their stepping off point was that, I
15 think that's the best first blush model.

16 At a high level, it had some deficiencies.
17 I don't think that they realized the importance of
18 assembling this third point here; assembling resources
19 from CLECs, collocation cages, switch ports, et
20 cetera, so that they could do live tests on the things
21 that they had bought from the LEC.

22 The test is very heavily shifted towards
23 virtual testing, if you will. They didn't really
24 process test results in the volumes that they would
25 need to. They didn't have access to collocation cages

1 until late in the process where they could do hot cuts
2 to see that a customer had been converted to another
3 network, and the LNP had followed it. That came about
4 too late. So I think, while some of it is going on in
5 New York, it didn't get the type of emphasis that I
6 think you would do if you were designing a test now,
7 knowing what we know.

8 Commercial volumes. They never pushed
9 through enough commercial volumes or something close
10 to commercial volumes as they could. And again, part
11 of this goes back to the way they set up the test.
12 Since Bell Atlantic knew exactly what test resources
13 it was going to use, what test lines were going to
14 happen and the types of things that were going to
15 happen to it, they could prepare in advance far more
16 than they could in the real world. So you need these
17 other resources in there so that, as a third party
18 runs tests, it can stress the system in unexpected
19 ways, ways that the telephone company isn't prepared
20 for.

21 Texas, I'm not as familiar with. I know
22 that one of it's problems is that it's not testing the
23 ability of carriers to develop an interface. My
24 understanding is they're either using AT&T or MCI's
25 existing interface as the method to push orders in, so

1 at best, as it's currently structured -- at least as
2 it was structured the last time I was involved in
3 discussions about it -- it might test how well that
4 interface and that company's interconnection is
5 working. But it's not really set up as a generic test
6 and the way it should be.

7 California is much earlier down the line.
8 My understanding of the California process is,
9 California asked Pacific Bell to design the
10 third-party test. Then, you know, after the fox came
11 back with the plans for the hen house, they had a
12 third party, Telcordia -- am I saying that right? I
13 keep wanting to say Bellcore. But Telcordia, whatever
14 the new name is -- come in and do an evaluation of the
15 test plan.

16 So I don't think they've selected Telcordia
17 perhaps as a third party yet, but they certainly hired
18 them to evaluate the third-party test plan, so they're
19 really back in sort of a mixture of selecting the
20 third party and developing a test plan.

21 It's still a relatively early -- early in
22 its roll out. But of those three, I think New York is
23 the best starting point, and then you would build from
24 it, recognizing some of the areas where even, I think,
25 they might have made changes had they known at the end

1 everything they know -- at the beginning what they
2 know now.

3 **COMMISSIONER JOHNSON:** Okay. Thank you.

4 **COMMISSIONER DEASON:** Staff have any
5 questions? (No response.) Thank you. And thank you
6 for going so quickly.

7 **MR. GILLAN:** I knew we'd get you back on
8 track eventually.

9 **COMMISSIONER DEASON:** Okay.

10 **MR. MINNIG:** My name is Stephen Minnig. I'm
11 with KPMG, and as you may know, KPMG was the test
12 manager for the recently or soon to be concluded test
13 in New York. We're also doing the same role,
14 performing the same role as a third-party test manager
15 in Pennsylvania.

16 And what I wanted to do this morning, or
17 this afternoon rather, is tell you a little bit about
18 the New York test and essentially segue to the
19 previous -- from the previous presentation about
20 third-party testing from our perspective.

21 I wanted to talk a little bit about what the
22 alternative is for third-party testing, give you a
23 procedural overview as to how the third-party test was
24 conducted in New York, talk about some factors to
25 consider in scheduling because schedules are a very

1 important question that always comes up with regard to
2 how we conduct the test, the time line, the resources
3 that are required by Staff and Commission.

4 I wanted to also give you an overview of the
5 regional testing concept in which a test could be
6 conducted across several states simultaneously, and
7 then give you a brief conclusion about the benefits of
8 this process.

9 This is taken from the DOJ's evaluation of
10 BellSouth's second Louisiana application. "From the
11 information that is available it appears that an
12 independent process of this type," being the
13 third-party test, "along with the corresponding
14 reports and related documentation is much more likely
15 to develop and present evidence that will demonstrate
16 the efficiency, effectiveness and adequacy of the
17 wholesale support processes under review."

18 What we are doing here is simulating the
19 CLEC marketplace in a particular state. Why don't we
20 go to the next slide.

21 There are three different ways in which an
22 RBOC can demonstrate openness in the local
23 marketplace, and by focusing on the third-party test I
24 hope to be able to show you why that provides probably
25 the best example.

1 The market shared test provides a way for an
2 RBOC to demonstrate that they've lost a significant
3 market sharing in a particular area and consequently
4 they should be given relief and be able to enter the
5 long distance market.

6 The difficulty with that is that many CLECs
7 target particular markets or target particular service
8 delivery mechanisms; resale versus platform versus
9 UNE. An RBOC sponsored test, as we've discussed in
10 this previous presentation, has difficulties itself
11 because there's always a question as to what the facts
12 actually are. And that's why an independent
13 third-party test looks to be a better alternative in
14 that it establishes the facts up front and allows
15 people then to debate the facts in an open hearing
16 such as this.

17 The approach that we've been advocating
18 evaluates the RBOC's operations across three
19 dimensions. Not only are we looking at the
20 transaction testing, which is really what everybody
21 focuses on, but we're also looking at what it takes to
22 establish the CLEC/ILEC relationship; account
23 management; the activities that the CLEC has to go
24 through in order to become certified by the RBOC; and
25 therefore, permit transactions, and then the types of

1 activities that are required to maintain the CLEC/ILEC
2 relationship.

3 OSS testing, third-party testing, validates
4 the operational readiness and accessibility of an
5 ILEC's OSS to the CLECs. What we are looking at is
6 analyzing the performance and scalability by doing two
7 things; defining and understanding the performance
8 metrics and the performance metric process, and
9 scalability by being able to transact reasonably
10 foreseeable volumes into the ILEC systems.

11 Our analysis also spurns improvements that
12 make the CLEC/ILEC interactions more efficient. I'm
13 going to talk in a few slides about the exception
14 process which was put into place in New York which
15 permitted Bell Atlantic to essentially, while the test
16 was being conducted, make improvements to their
17 systems and correct problems that we had found earlier
18 in the test.

19 And then, of course, the evaluation verifies
20 compliance with the state and federal guidelines which
21 eventually would permit the RBOC to offer in-region
22 long distance services.

23 Here are the players in a typical
24 third-party test. The Public Utility Commission is
25 the owner of the test. The test is being conducted at

1 the behest of the Public Utility Commission. The
2 third party serves at the direction of the Public
3 Utility Commission. We are the test managers. The
4 Commission owns the test. We are working with various
5 parties who are interested in the test. Obviously,
6 the ILEC is very interested in the -- what is
7 happening with the test. They have the systems that
8 are being tested.

9 We're also working very closely with the
10 CLEC community in that particular state or region to
11 make sure that they are deeply involved in the test
12 and that their inputs get reflected, not only in the
13 test plan, but in the actual testing process itself.

14 Third-party test that occurs over three
15 phrases. The first phase involves the development of
16 a master test plan. The master test plan is specific
17 to the state or region being tested. It addresses the
18 mix of products and services that are offered in that
19 state or region. It also addresses the volumes that
20 would be reasonably foreseeable in that same state or
21 region.

22 Phase II is the heart of the process.
23 That's the actual conducting of the test itself. And.

24 Phase III is the evaluation of the results
25 and preparation of the final report.

1 In New York we have prepared a draft final
2 report. We are at a stage now where the New York
3 Public Service Commission is going to have a technical
4 conference next month, at which point we'll be taking
5 those inputs and finalizing the report.

6 **COMMISSIONER JOHNSON:** Testing in Phase II
7 and III --

8 **MR. MINNIG:** Yes.

9 **COMMISSIONER JOHNSON:** You were -- what --
10 your testing and evaluating, what criteria and
11 measurement are you using to determine if something
12 was successful or not successful? How do you
13 determine your perimeters? Is it some FCC order? Is
14 it the state commission saying what the time period
15 for response or what a good failure rate is or a
16 successful rate?

17 **MR. MINNIG:** It comes from several sources,
18 but what we try to do is we try to establish those
19 criteria up front in the master test plan.

20 **COMMISSIONER JOHNSON:** I'm sorry. What?

21 **MR. MINNIG:** We try to establish it in the
22 master test plan up front. So we've -- for example,
23 in New York, there were two, possibly three sources of
24 targets for performance. There was a prefiling
25 agreement that Bell Atlantic had filed and had agreed

1 to with the Public Service Commission, which stated
2 what they were going to do for various items; respond
3 to 99% of orders within 24 hours, repair within three
4 days, that type of thing. There are also analog
5 retail metrics as well.

6 So we take the retail metrics, we take
7 whatever has been agreed to between the Commission and
8 the ILEC, and we take also various FCC or other types
9 of orders that would be used to fill in the gaps. We
10 have these defined up front in the master test plan
11 and when we do the test themselves we take those
12 results and compare them to what was in the master
13 test plan, what we expected the results to be. And
14 that's where we make that determination.

15 **COMMISSIONER JOHNSON:** Then going back to
16 Phase I, was that done through, like, a proceeding?
17 Was it a docketed matter before the Commission where
18 the CLECs were involved, too, to help make those
19 determinations as to --

20 **MR. MINNIG:** Right. It wasn't involved in a
21 formal docket-type of proceeding. The way it worked
22 is that a draft master test plan was created. We're
23 going through this process right now in Pennsylvania.
24 That was sent out to all the interested parties; the
25 ILEC, any CLECs who declared an interest in

1 participating in the process. They provided feedback
2 to us. We discussed that with staff, in terms of how
3 we wanted to make changes to be able to incorporate
4 that feedback. And from that, a final version of the
5 master test plan is defined. And, of course, with the
6 final version, nobody ever gets everything that they
7 want. It's not a matter of getting what you want.
8 It's a matter of what is right and what is wrong. So
9 that master test plan essentially provides the source,
10 the Bible, for what we do going forward.

11 **COMMISSIONER JOHNSON:** Okay.

12 **MR. MINNIG:** We are looking at doing two
13 different types of tests; procedural tests and
14 transactions based tests.

15 Transaction tests are, I think, what
16 everybody really understands the testing process to
17 be. The test manager submits an order into the ILEC
18 systems. It gets back an electronic response
19 accepting the order or not accepting the order. And
20 the progression of these transactions are done
21 throughout the customer life cycle. So there would be
22 preorders -- preorder transactions, which then would
23 be followed by order transactions, which then would be
24 followed by billing or maintenance repair
25 transactions, all in the same account. So we could

1 simulate what is happening on a customer's account
2 throughout the entire life cycle of that customer. We
3 just compress the time down. Instead of it being
4 years between, say, a trouble report, we do that in a
5 period of weeks or month.

6 The procedural tests are evaluations of
7 wholesale processes; maintenance and quality of user
8 documentation, which is so important to CLECs as they
9 are entering the marketplace; help desk functions,
10 work center operations, provisioning processes. We
11 heard earlier about some issue with regard to change
12 management to make sure the change management
13 processes were in place.

14 The test relies on the definition of real
15 world scenarios. As I said earlier, we are not just
16 simulating a CLEC, we are simulating the CLEC
17 marketplace in a reasonably foreseeable future.

18 In New York we were looking at volumes 18 to
19 24 months out from the time the master test plan was
20 developed. We were then using those volumes against
21 the currently available products and services that
22 existed in New York. If a product or service like
23 xDSL didn't exist at the time that we were doing the
24 test, but we knew it was to exist in 24 months, we
25 could not test that and that would be noted as such.

1 The various inputs into the development of
2 the master test plan in terms of what we're going to
3 test as a product and service matrix that the CLECs
4 want to offer and that is being offered by the RBOC.

5 There are transaction statistics showing the
6 mix of the different transactions that CLECs are
7 currently doing and expect to do in the future as well
8 as what the RBOC is measuring themselves.

9 We also ask for some high priority example
10 transactions that people wanted to see tested and then
11 we ask for the top 20 suggested test cases.

12 Points to consider is that we included error
13 types and frequency of errors, so that we could
14 experience and understand specifically what we would
15 think the CLEC would be experiencing as well.

16 So we did submit orders with known errors in
17 there and we did have expectations as to what the
18 response should be. If we got a different response
19 back, then we knew there was a problem and that was
20 noted.

21 And the products and service realistically
22 represented what we think the CLEC would have -- would
23 have bought and would be buying in the future.

24 **COMMISSIONER JOHNSON:** How do you all
25 handle -- it's always hard for me to understand things

1 in the abstract. But if BellSouth offered TAG, LENS,
2 EDI, and so the way to collect -- and the interface
3 was different for the different systems, how do you
4 determine -- do you do a test for each system and have
5 different standards for LENS and what the response and
6 failure rate should be for LENS versus EDI versus TAG?
7 How do you all work through that?

8 **MR. MINNIG:** It depends on the ILEC that
9 you're doing the test against. In the situation that
10 just concluded in New York, there were two methods for
11 getting orders into Bell Atlantic systems. There was
12 a web GUI and there was an EDI-like system. So we
13 used -- we tested against both of those systems and we
14 had metrics and standards against which -- that we
15 were testing against both.

16 So, if we were to look here in maintenance
17 and repair, for example, maintenance and repair is
18 generally done with a web based system. We would be
19 doing maintenance and repair types of transactions to
20 a web based system. The same system that any CLEC
21 would be able to -- would be using in that
22 marketplace.

23 **COMMISSIONER JOHNSON:** Okay.

24 **COMMISSIONER JACOBS:** Did I understand that,
25 I guess, if I recall the major companies, the high

1 volume companies are most likely to have the EDI and
2 the lower volume companies are going to be using the
3 web base or --

4 **MR. MINNIG:** Right. Generally, that's what
5 we had seen. We believed and have been told by the
6 CLEC community that the larger CLECs, who are going
7 after the mass market, would be using EDI, the
8 electronic bonding type of interface. And the smaller
9 CLECs, who are focusing on one particular market
10 segment, would be using the web based interfaces.

11 The difference that we're seeing now is
12 we've gone from New York to Pennsylvania is that the
13 Commission and staff in Pennsylvania are more focused
14 on the web based interface. New York was more focused
15 on the EDI-based interface.

16 Consequently, the test plan, because the
17 test plan is specific to the region or the state that
18 we're doing it, is geared more towards web based
19 testing in Pennsylvania.

20 **COMMISSIONER JACOBS:** Okay.

21 **MR. MINNIG:** Here's a typical New York
22 example of how we can break down what is actually
23 occurring in the course of a test.

24 The previous slide showed how we developed
25 scenarios. In New York we developed something on the

1 order of 130 scenarios for customer interactions with
2 the ILEC. These scenarios get broken down to specific
3 test cases. So, for example, a scenario might be a
4 migration as-is of a small business customer to a CLEC
5 in the resale using a resale as a service of a
6 remechanism.

7 The individual test case for that, and there
8 will be many, would be migrating a particular
9 telephone number, a particular account, on the fifth
10 business day after receipt of that order.

11 The transaction which is generated from that
12 test case, would be the local service request, the
13 LSR, which we would begin developing and putting into
14 the correct EDI format for transmission into the
15 ILEC's systems.

16 We did this across the entire customer life
17 cycle so we do -- some examples for preorder, we do
18 the customer service record retrieval. We do a
19 telephone number reservation, a whole host of other
20 types of preorders. The order might be the migrate
21 as-is. For provisioning we'd be doing pair
22 assignments in the field, maintenance and repair.
23 We'd be generating trouble tickets and watching that
24 process. And then, of course, for the billing, we'd
25 be looking at the monthly recurring charges, the

1 nonrecurring charges, what have you.

2 These are examples on the bottom line in
3 terms of what we'd be -- what the specific types of
4 transactions we'd be looking at.

5 I talked a little bit earlier about the
6 exception process. When we entered into the testing
7 in New York we were looking at doing a single test,
8 coming up with the results and being done with it.
9 During the course of the evaluation it became clear to
10 the Commission and Staff that they wanted to turn this
11 into a military-type of test in which we would
12 continue to do testing until that time which they were
13 satisfied that problems that had been found had been
14 corrected.

15 To institute this military-type of test, an
16 exception reporting process was defined. So as we
17 were going through the entire test suite of these 133
18 scenarios, there were 39 separate individual tests
19 defined in the master test plan. If we found a
20 problem or an issue that needed to be raised
21 immediately, we would identify what that fault was,
22 and prepare an exception report for Staff for the
23 ILEC. This was then posted on the New York Public
24 Service Commission's web site so it was available to
25 all the CLECs to be able to see what the issue was, so

1 if the CLECs were having the same issue they would
2 know what correction needs to be made to be able to be
3 in business.

4 The ILEC would respond to the original
5 report and either refute the finding, which happened
6 in a couple of cases and that we just didn't
7 understand something that -- we misinterpreted
8 something that they had provided us, or they would
9 describe the means by which they intended to address
10 the fault.

11 We would then go back after they'd addressed
12 the fault in that case and retest, or in the case of
13 which was refuted and we agreed to it, we would then
14 close out the exception itself.

15 In the case of New York, I think we found 58
16 or 59 different types of exceptions ranging from
17 faulty documentation, changed management procedures,
18 to actual individual types of transactions that they
19 could not handle and these were worked and corrected
20 while the test was going on so that we could then go
21 back and retest during the course of the evaluation.

22 It turned out to be quite an effective way
23 for information to get out to the CLEC community and
24 for them to be able to adjust and build their systems
25 to be able to accommodate these changes as Bell

1 Atlantic was making them on the fly.

2 Here's a schedule. It's more of an ideal
3 schedule. And the schedule itself is dependent on
4 many variables which I'd like to go through.

5 Developing the market forecasts and the test
6 plan requirements can take a period of between eight
7 to 12 weeks. During that time it is possible to
8 develop the electronic interface between the test
9 transaction generator and the ILEC. By having those
10 two things happen parallel, you're actually shortening
11 the overall length of the testing process.

12 Again, that depends very much on what the
13 RBOCs 271 schedule is, the evaluation criteria that
14 needs to be established, any prefiling commitments
15 that have been made between the RBOC and the State
16 Commission in which the test is being conducted.

17 During the course of the test, that can take
18 anywhere from 6 to 14 weeks in an ideal circumstance.
19 That's dependent very much on OSS and interface
20 changes. If the decision is to go with a
21 military-type of test, which seems to be the way the
22 people's interests are going, because at the end of
23 the day we want to have a system that works for the
24 CLECs, that can lengthen the time of the testing
25 process out quite substantially as the ILEC makes

1 changes to their systems.

2 And then, of course, at the very end you
3 have a final report, which would be the evaluation of
4 the results and resolve any exceptions.

5 The question always comes up about
6 resources. People always have the impression that an
7 evaluation of this type takes a lot of resources from
8 staff.

9 Essentially, here are the types of roles and
10 responsibilities that we have seen work in both New
11 York and Pennsylvania. Staff attends meetings between
12 the major stakeholders because a lot of issues that
13 are coming up between various groups, it's important
14 to have Staff there to be able to resolve. Staff and
15 Commission owns the test so we want to make sure that
16 they're very much involved in the process.

17 Monitoring the progress of the test domains.
18 We look at the testing across several domains or
19 several different types of tests, and we want to make
20 sure that everyone understands where we stand on that.

21 Providing the ad hoc review of
22 domain-specific concerns. During the course of a
23 test, we might have specific issues that come up in
24 the provisioning area or the maintenance and repair
25 area that need -- that are really policy issues that

1 need to be resolved at the staff and Commission level,
2 and the earlier the people are involved in that
3 process and understand the issues at hand, the more
4 likely it is to result in a quick and satisfactory
5 resolution.

6 And of course, providing testing status to
7 the media and the federal regulatory officials. We
8 found that to be a useful exercise in New York and it
9 kept the people participating in the test away from
10 having to worry about those concerns.

11 The final point is, although the final
12 report is a deliverable of the test manager,
13 involvement of staff throughout the process ensures
14 that the filings were understood and communicated
15 throughout the test period.

16 The New York test is now coming into it's 11
17 month. Consequently the involvement of Staff
18 throughout this whole process is very important. It's
19 enabled Staff to gain a much more detailed
20 understanding of the ILEC's systems and processes.

21 Any evaluation in Florida --

22 **COMMISSIONER DEASON:** Excuse me. New York
23 is now is in it's 11th month, is that correct?

24 **MR. MINNIG:** Essentially. We started
25 development of the -- the time frame, the schedule

1 that I showed two, three slides back, is a little
2 different in New York than is being done in
3 Pennsylvania because we didn't -- we made everything
4 essentially surreal in nature. We weren't able to
5 bring certain things back. The development of the
6 interface, as well as the developing the master test
7 plan, we didn't do that simultaneously for any number
8 of reasons in New York because there were separate
9 contractual issues involved with the different
10 parties.

11 The testing began in New York. The actual
12 testing began in New York in mid-August. The testing
13 concluded in the terms of sending transactions back
14 and forth in the February -- end of February time
15 frame. There are, of course, exceptions that need to
16 be resolved, and so we do have the test harness, the
17 test bed, still operational so that we can go back and
18 do some transaction testing later on as part of the
19 Staff and Commission's request that Bell Atlantic
20 maintain a test bed, so that later on, if issues came
21 up during course of the hearings or whatever, that we
22 could go back and test some specific issues that might
23 arise.

24 So that is the -- the 11 months are really
25 from the time that we started on the contract and

1 developing the master test plan until now when we're
2 about to go into hearings.

3 **COMMISSIONER DEASON:** The reason I ask the
4 question, your slide No. 13 indicates that about six
5 months at the outside will be the anticipated
6 schedule.

7 **MR. MINNIG:** That's right. New York was the
8 first one. We've learned a lot and that's what we've
9 done.

10 Can we go back to -- great. The interface
11 development piece in New York did not occur in
12 parallel with the test plan definition of refinement
13 and the market forecast. Two reasons for that: One
14 was the readiness of the ILEC to have the interface
15 available for us to develop against.

16 The second reason was a contractual reason
17 in that there was a separate contract let for the
18 pseudo-CLEC or test transaction generator in New York.
19 And that occurred after the development of the master
20 test plan.

21 So there was a hiatus of several weeks while
22 this other party was brought under contract and then
23 they started to develop the interface.

24 In Pennsylvania, because the two parties are
25 working together, KPMG and Hewlett Packard, we've been

1 able to do that parallel. And so that cuts off 12
2 weeks right there.

3 **COMMISSIONER JOHNSON:** So Hewlett Packard
4 developed the interface?

5 **MR. MINNIG:** Hewlett Packard developed
6 the -- they provided the EDI mapping, the translation
7 between the business rules and the EDI format. So we
8 would provide them a local service request in a
9 particular electronic format. They did the
10 translation into the proper EDI 8 or EDI 9 format and
11 transmitted it across to Bell Atlantic and then
12 collected the responses. We then took all the
13 responses and did the analysis based on that.

14 There was a lot of -- New York was a very
15 valuable experience for a number of reasons. We
16 certainly learned about the complexity of this type of
17 a test and the complexity of all the different changes
18 that can occur during one of these activities, and
19 this is something that one would be able to build on
20 in a future test. This certainly has helped us a lot
21 in defining the master test plan in Pennsylvania and
22 the way we're conducting the Pennsylvania test.

23 The interesting thing, because New York is
24 part of the old NYNEX company, Pennsylvania is part --
25 is in the Bell Atlantic -- what was the original Bell

1 Atlantic. The systems are different and the business
2 rules are different between New York and Pennsylvania
3 so we're essentially starting a new test against new
4 systems in Pennsylvania is what we had done in New
5 York.

6 Here's what we would do. We would evaluate
7 the system's interfaces and process the differences in
8 constructing individual tests. The mix of products
9 and services are, of course, market specific. The
10 volumes of transactions, the scope of the test would
11 be individually configured.

12 If we can talk about regional testing as an
13 alternative. Regional testing is a collaborative
14 venture in which more than one state in an RBOC's
15 territory participates in the OSS evaluation.

16 ILEC systems and many large CLEC systems are
17 regionally based. They're not based upon individual
18 states, although business rules may be state specific.
19 And what we have found is that there are certain
20 benefits doing a regional test, in that you can test
21 the RBOC's systems across the entire region with
22 volumes that represent volumes that would be
23 reasonably and foreseeable across the entire region.

24 If you think about doing a specific test in
25 a state in which you might have a reasonably

1 foreseeable volume of 10,000 transactions per day,
2 and in neighboring states you also have 10,000
3 transactions per day. To do a complete and thorough
4 test of the RBOC's systems, you would need to,
5 essentially, provide 10,000 transactions for the state
6 that you're doing the test, but also 10,000
7 transactions for every state that is in that same
8 region. So essentially what you're doing is a
9 regional test to be able to properly exercise the
10 RBOC's systems.

11 The other interesting factor or the
12 important factor about a regional test is that it
13 mitigates the staffing requirements on the PUC/PSC
14 resources. Staff from each state would have a role in
15 oversight but no one state would bear the sole burden
16 of staffing the entire projects.

17 And, for example, one staff person
18 representing all the states could be appointed as a
19 representative for various functional areas or various
20 domains. This helps to spread the load from a
21 staffing perspective from a monitoring perspective
22 across the multiple states.

23 The difficulties associated with this,
24 however, is that a regional test requires cooperation
25 of the ILEC in the sense that they're 271 filing

1 schedule should match up pretty closely to what states
2 in that region are being tested. It wouldn't do them
3 a lot of good to do a test in a state that they had no
4 intention of doing a 271 filing in the near future.

5 **COMMISSIONER JOHNSON:** Have you provided any
6 regional testing?

7 **MR. MINNIG:** We are beginning -- we're just
8 beginning dipping our toe in the water of regional
9 testing in Pennsylvania in the sense that we're going
10 to be including transactions in New Jersey as well.

11 And consequently a regional test -- we know
12 the Bell Atlantic systems pretty well after what we
13 looked at in New York and we know that in the Bell
14 Atlantic south region that there are system
15 differences between what would be in Virginia,
16 Maryland, Washington D.C. And West Virginia.
17 Those -- the former Chesapeake (Interference from
18 microphone) Companies and then the Pennsylvania, New
19 Jersey, Delaware states. So we're looking to do a
20 Pennsylvania test which would include transactions in
21 New Jersey as well as Delaware.

22 The regional test can provide a more
23 complete view of the RBOC's readiness. A mix of
24 products and services being tested are tailored to
25 mirror the market across the individual states so that

1 the total transaction load reflects regional use.

2 That's the point I just made a minute ago.

3 And the results of the functionality test
4 can carry over from state to state because in many
5 cases, the wholesale systems and processes are
6 generally the same.

7 And in the development of the master test
8 plan, were we to do a regional test, you would be able
9 to see what those differences were and understand how
10 we would test state by state differences as well as --
11 instead of having to do the whole thing uniquely.

12 Closing slide. The independent third-party
13 approach to OSS testing is direct benefits for state
14 commissions, the RBOCs, the CLECs and consumers. We
15 are providing a standard fact-based repeatable
16 methodology for evaluating RBOCs. This gives staff
17 commission great insight into the RBOC's operations
18 beyond what you might have on an -- outside of this
19 type of a test.

20 The ILEC, of course, a successful test
21 brings them one step closer to 271 approval and
22 service to wholesale customers, the CLEC is improved
23 during this process, or it's shown to be adequate.

24 For the CLECs, obviously the successful test
25 demonstrates the readiness of the ILEC to provide an

1 environment which supports competitions. This is the
2 level playing field argument, and service for the end
3 customer, the end user is improved.

4 And, of course, the ultimate beneficiary are
5 the consumers. There is greater product, innovation,
6 lower prices, more choice. Thank you very much.

7 **COMMISSIONER DEASON:** Thank you.

8 **COMMISSIONER JOHNSON:** How were you selected
9 in Pennsylvania and New York? Was it an open bidding,
10 RFP type process or --

11 **MR. MINNIG:** Yes. It was actually
12 different in both states. In New York it was an open
13 process. There was an RFP that was put on the market
14 for the first phase, which was developing the master
15 test plan, and then in the subsequent phase, which was
16 conducting the test.

17 We bid on the first phase, won that and then
18 kept on with doing the test as the test manager. In
19 Pennsylvania, it was not done through an RFP process.
20 It was done slightly differently.

21 You had asked a question in the previous
22 presentation about funding and the like. In New York
23 and in Pennsylvania, the ILEC is funding the test, and
24 so what we have in Pennsylvania, and similarly, what
25 we had in New York was a three-way contract between

1 the test manager, the ILEC and the Commission in which
2 the test manager works with the direction of the
3 Commission, and the ILEC funds the test manager.

4 **COMMISSIONER JOHNSON:** The cost --

5 **COMMISSIONER CLARK:** You still didn't really
6 resolve how it was done in Pennsylvania?

7 **MR. MINNIG:** Because of the contract,
8 because the actual financial transaction occurs
9 between the ILEC and the test manager, we just set up
10 a contract, a separate contract with Bell Atlantic,
11 which the Commission was a party to and a signatory to
12 it.

13 **COMMISSIONER CLARK:** How were you selected?

14 **MR. MINNIG:** It wasn't a selection process.
15 We had spoken to people in Pennsylvania during the
16 course of the New York test to keep them informed as
17 to what we were doing. The CLEC community was very
18 happy with us. The ILEC was happy with us and so it
19 was one of these meeting of the minds.

20 **COMMISSIONER JOHNSON:** And the cost?

21 **MR. MINNIG:** Yes, the cost. In
22 Pennsylvania, if I understand correctly, the cost is
23 \$9 million. New York was, I think, probably not quite
24 twice that, maybe \$17 million. I'm not sure, because
25 the contract in New York included the test transaction

1 generator as a separate contract so that would be
2 lumped in as part of that \$17 or \$18 million.

3 **COMMISSIONER JACOBS:** Does a test plan
4 specify when enough is enough? In other words, it
5 sounds like because a Commission owns it, there is no
6 one company that says -- signs off and says, it now
7 meets my specifications.

8 **MR. MINNIG:** Right.

9 **COMMISSIONER JACOBS:** Sounds like there is
10 some strategy to determine how far you'll go and some
11 people may get all they want and others may not.

12 **MR. MINNIG:** That's true.

13 **COMMISSIONER JACOBS:** Is it correct then,
14 that's determined in the development of the master
15 test plan? And then if that's the case, how do you
16 balance what -- what the ultimate results will be?

17 **MR. MINNIG:** Sure. The development of the
18 master test plan was done in a collaborative
19 environment in a sense that we put out a draft and
20 then solicited comments from all the interested
21 parties. And then the test manager and staff worked
22 out all the differences that existed from all the
23 comments that came back and put together something
24 that we felt was meeting the general needs of everyone
25 involved in the test, as well as the needs of staff

1 and Commission and the citizens in that state.

2 So, there was not one company or one set of
3 companies that could look at the plan and say, yes,
4 this is exactly what I want and I'm going to sign off
5 on this. Because I don't think anybody really got
6 everything that they wanted. In some ways, it was a
7 stricter test, obviously, than the ILEC wanted. It
8 didn't go far enough in some areas for the CLEC
9 community. And those differences depended on what the
10 CLECs -- the interested CLECs somewhere geared mainly
11 towards resale and so they weren't as concerned about
12 platform or combination tests. Some were not as
13 concerned about certain types of electronic interfaces
14 as others, and so there was a sort of a blending.

15 **COMMISSIONER JACOBS:** A lot of give and take
16 sounds like.

17 **MR. MINNIG:** Right. There was some give and
18 take. Now, what it did establish was what was going
19 to be tested. It didn't establish how we were going
20 to do the test. The how part actually came in the
21 development of individual test plans during Phase II,
22 during the phase of conducting the test.

23 So, there were -- probably if we were to go
24 back, and this is something that we've learned and
25 taken forward into Pennsylvania and we would take

1 forward into other states, is that the criteria of
2 whether a test is -- or whether the results are good
3 or bad would be established more -- would be
4 established more up front as opposed to being sort of
5 a living document.

6 **COMMISSIONER JACOBS:** Sounds like the
7 measurement of the results is not so much a state of
8 readiness of an OSS, but a state of, I guess, for lack
9 of a better term, functions that are capable.

10 **MR. MINNIG:** That's true.

11 **COMMISSIONER JACOBS:** I guess that is a
12 state of readiness, but I'm thinking that -- and as
13 opposed to some really well defined box that you get,
14 you get really kind of an algorithm, again I'm
15 stretching out my words here, that has some things in
16 it that are well-honed, some things in it that are
17 less well-honed, but basically all kind of works well
18 together.

19 **MR. MINNIG:** Well, if -- one of the
20 interesting things is that there were so many
21 different results that were developed. Thousands of
22 different statistics. And so rather than aggregate
23 them and say that, you know, this is a pass or this is
24 a fail, we would provide what the business implication
25 was of a particular number being here versus some

1 place else. What does that mean to a CLEC trying to
2 conduct because when it takes 72 hours to get a firm
3 order confirmation back versus the standard of 24
4 hours?

5 And because some of them met the standard
6 and some of them didn't meet the standard, we weren't
7 totaling it up and saying at the end, you know, 14
8 standards were met and three were not. We were
9 providing what the business implications were of those
10 that did not get met and then it would be up to Staff
11 Commission in the guise of a hearing in which all the
12 participants would be able to discuss it to determine
13 if that was a significant miss or not.

14 **COMMISSIONER JACOBS:** Okay.

15 **COMMISSIONER DEASON:** Thank you.

16 **MR. MINNIG:** Thank you very much.

17 (Pause in proceedings.)

18 **COMMISSIONER DEASON:** Peter Delatour with
19 WORLDLINK.

20 **MR. DELATOURE:** If you don't understand
21 something, my -- I kind of lost my voice over the
22 weekend, long flying between Brazil to Miami, from
23 Miami to Tallahassee. But I want to thank pretty much
24 the committee to -- for allotting WORLDLINK Long
25 Distance and the CLEC to provide their information and

1 also their frustration as far as local service
2 concern.

3 Starting off, as far as we are not a
4 facility-based, we are a regular CLEC. We utilize
5 whatever piece of equipment that BellSouth give us, or
6 software, whatever that BellSouth provide us, which as
7 we know -- we know it by LENS, and also the actual
8 paperwork that we submit and whenever LENS is not
9 working.

10 Fair to say that 60% -- 60 to 65% of the
11 time LENS, the program LENS, is down, and there is a
12 great amount of frustration as far as the time length
13 as it does take for LENS to pop up on the screen. And
14 I meant to ask the lady from TCCF -- I mean, I have no
15 idea what kind of software she's using for LENS, but I
16 would like to know, because that it does take time
17 before LENS popped up on the screen.

18 Our main frustration is the client that we
19 were implementing then, that as in the LENS, we are
20 experiencing a problem with it. I was gladly to hear
21 that BellSouth testing device shows like it was
22 89.89%.

23 Our project manager, our testing versus
24 order that we put through that goes through LENS, it's
25 32% of the order does get processed with LENS, and 68%

1 get rejected.

2 Common area with LENS, that half of the
3 time, 50% of the time, when you implement an order in
4 LENS and you're checking a -- or you're checking FOC,
5 the order is nowhere in the system to be found, and
6 there is no explanation. You call the local
7 representative. There is no explanation about how
8 that the order just recently disappeared.

9 I don't think it's fair to point fingers to
10 whether it's AT&T, MCI or WorldCom. What I think we
11 have here, it's a problem that needs to be solved. It
12 doesn't matter how big and how strong the company is
13 in the industry. It's a problem with local services
14 that needs to be resolved as far as with providing
15 better software and equipment to CLEC like us and --
16 or bigger CLECs, facility-based where they can provide
17 a secure service for their customer.

18 We had experienced dramatic problems as far
19 as customer turnaround time. As an example, number
20 one, that it takes us a month and a half to do change
21 in order for a customer submitting five versions of
22 the conversion to BellSouth.

23 One version was with LENS. And next day we
24 had to do it through paperwork because LENS was not up
25 and running; and actually in the -- by the end of the

1 month, that to find out that BellSouth, they give us
2 an FOC, and it was great. The client was -- just a
3 day before the client moved.

4 The problem that we are resolved out there,
5 sometimes when BellSouth does go to the site, there is
6 no communication between the LEC and us to let us know
7 exactly what's going on, even though that we are
8 calling based on the order.

9 What's apparent, that sometimes the
10 representative might be calling to a different job
11 site and they forget to call the order in for it to be
12 dispatched by another member of BellSouth, and the
13 customer just get left in the dark and we get left in
14 the dark. Customer says, well, BellSouth never shows,
15 and we just -- we just have to go back again, and the
16 customer have to wait for maybe a next available date
17 or maybe next available week, whenever BellSouth could
18 get up to fix the problem.

19 It's my frustration with the LENS as -- and
20 the whole system that it takes us anywhere from six to
21 seven business days to get a customer up and running.
22 If I was a customer -- and I have did it for my
23 personal home to prove to certain members that this
24 does work -- it only take BellSouth -- I switch my
25 number back to my company. It takes those 10 days to

1 do that, and to switch back it only takes us 30
2 minutes to have my number back with BellSouth.

3 So it is a big factor for a small company
4 like us competing in a very "competible" world and not
5 having the facility based and not having the proper
6 software to provide our customer with better service.

7 And the other issue that we have, when
8 BellSouth have an issue with customer service or
9 customer calling in whether they want to pay their
10 bill or they don't, and they're assuming that we
11 switched them without authorization. And we are
12 finding in our dialogue -- and although that we get a
13 lot of those even though that we was never contacted
14 about those issue, but they went ahead and billed us
15 back for those -- they billed us back what -- \$29 fees
16 for unauthorized switch where we have an application
17 and LOA signed by the customer and said, yes, I wanted
18 service. But if we didn't catch it on the bill, we
19 would have paid it and BellSouth never would have told
20 us about it.

21 Main thing about telecommunication and as
22 far as long distance and local providing, our
23 company's stand is to provide the same access as
24 BellSouth provide for their people, for their
25 customers.

1 We think this is a very healthy industry.
2 It should be open not only to us as a long distance
3 and a CLEC company as well to BellSouth, but the
4 proper skills and challenge have to be met by
5 BellSouth as far as opening the market "fullish," not
6 only to their customers, as well to their CLECs. And
7 so far I can vouch on WORLDBLINK behalf that we have --
8 if we didn't have other different structures of
9 bringing income in, depending on local service alone,
10 we would have been out of business a long time ago,
11 because the overdraft of it, there is a big factor as
12 far as LENS and as well with submitting applications
13 through.

14 Supposedly we was sold upon and our contract
15 told us when we fax an application in, it's the most
16 secure device that you -- system that you could
17 utilize; and they -- we ensured us that the
18 application would not be misplaced or it can't be find
19 (sic).

20 We find it 45% of the times that we fax
21 something in, for whatever reason, nobody can find
22 what we're faxing in. That slow us a lot. Sometimes
23 when we have to do preorder by hand, it not normally
24 take us 15 days before we get a response by the LEC,
25 whether we have -- whether we have an FOC or whether

1 we have -- whether that the order been confirmed, or
2 whether they could make -- whether they can meet those
3 dates.

4 And the other process that I think -- which
5 is I kind of find it unethical -- is that when you
6 place an order using the -- using the paperwork, you
7 have to go through a procedures where if there is one
8 thing wrong, like the gentleman from MCI says that the
9 order would automatically get rejected and you submit
10 it again, something else wrong, the order get
11 rejected. And those times spent, you're looking at
12 anywhere from three to four days each time it gets
13 rejected.

14 Meanwhile the customer is out of the service
15 instead of we submit it in and they submit us back
16 with an application with all the proper correction,
17 and we could resubmitted it, and it would make a lot
18 more sense to us.

19 All this frustration that CLECs does go
20 through it just make us feel like the competitive
21 world is not really being opened. It's still an
22 exclusivity as far as who have the upper hand, because
23 the factors that we have tested, that customers are
24 getting better results when they go directly to
25 BellSouth -- they're utilizing us as a CLECs.

1 Many programs and many infrastructure from
2 BellSouth's side, we recently know about them, but
3 they was never provided to us, as far as different
4 services, different opportunities of upgrading what we
5 have instead of LENS. We was never told about them,
6 and this question was raised many times.

7 So we felt like we're not being told the
8 fairy tale, or we're not being told the whole -- we're
9 not being -- we're not being -- our eyes have not been
10 open to the full communication technology that's
11 available to BellSouth. And we felt like, you know,
12 that we are giving something that could be monitored,
13 whether it's a personal issue with a BellSouth
14 representative, whether it's a management situation;
15 and we have gotten to those situation quite a few
16 times with the managers.

17 And we walk the ladder and we end up back
18 from the same way we -- same way where we started at;
19 well, you have to wait until we could -- the
20 representative told you three days, then it's three
21 days going to take, whether BellSouth was wrong or not
22 wrong.

23 I felt like they have -- still have a long
24 way to go as far as us feel like we equally could
25 provide services just like BellSouth. And meanwhile

1 it's very hard for a customer like -- for a company
2 like us, because we're not providing somewhat of a
3 prepaid platform. We are providing customers with
4 credits lines and credibility when we base on
5 BellSouth more or less to act immediately on any
6 issues that we might have with the customer.

7 Example: We have a customer that utilize
8 \$50,000 in our network, long distance and locally, but
9 majority are locally. Customer was -- didn't pay the
10 bills for like four or five months. We went to LENS
11 and did a cancellation. Cancellation never happened
12 because LENS somewhat dropped it.

13 And, again, it does not make sense; a
14 cancellation that we have prior business to that,
15 prior business with BellSouth. I called in and said,
16 well, I want to cancel my number. It happened less
17 than five minutes. It's taken us still 24 to 48 hours
18 to do a cancellation without expose our company to
19 pretty much fraud or debt that we don't need to occur.

20 And there's a lot of issue that been
21 mentioned this morning and -- by different
22 representatives, by different companies. And I want
23 the FCC to take that in great consideration, because
24 there is majority of the companies that does represent
25 CLECs and that does do business as CLECs.

1 They don't have the funds and they don't
2 have switches. They didn't -- they're just each
3 individual company that's trying make it in a very
4 competitive world.

5 For service not to accurately be processed,
6 not because of a mistake that we have made, for a
7 mistake that BellSouth have made, we felt like we
8 CLECs should not be a test to this products that have
9 brought on to the FCC to open the market and the
10 Public Service Commission.

11 We felt like they should have done their
12 homework already, and we felt like we are being used
13 as a test. And I would like to bring the gentleman
14 from GTE -- which is that -- it's American Dial Tone,
15 which is more or less that we probably will be doing a
16 joint venture with, so he could explain you the
17 problem that he's experiencing with GTE.

18 **MR. KLEIN:** Well, thank you for your time.
19 My name is Steve Klein with American Dial Tone, and
20 I'll be pretty brief. I don't have a big speech here.
21 Our company is a reseller with the GTE marketplace in
22 Tampa Bay.

23 Now, I'm a new reseller, so I don't have a
24 lot of experience here, but I am very familiar with
25 the challenges that we're having from the retail

1 business. I ran a 40-store chain. I was president of
2 it until just about six months ago. And 10 years ago
3 we addressed these issues of an exchange
4 clearinghouse, standards and what have you; quite
5 involved in that.

6 And what my comments are, is I'm -- being
7 new with GTE, I'm pretty impressed with them so far.
8 In the spirit of competition, I think they've been
9 very friendly, very professional, and they follow up
10 in a very timely matter, and that's something that
11 needs to happen in the business world. So I've got to
12 compliment them there.

13 We are putting our orders in through WISE,
14 which is their Internet interface. And my LSR
15 confirmations are coming through in a timely manner,
16 within in a few hours or by the next day. I'm getting
17 errors within minutes. As soon as I put it through in
18 WISE, it takes them about one to four minutes to give
19 me an error report. So I was pretty impressed with
20 that through WISE. The due dates have been met so
21 far, so that's pretty good.

22 One thing, there has not been any connection
23 confirmation. So they say that's happening, but it
24 isn't yet, and I just spoke to Jerry Mullin
25 (phonetic), and he's going to look a little more into

1 that.

2 **COMMISSIONER JOHNSON:** How many customers do
3 you have?

4 **MR. KLEIN:** I'm somewhere -- I've only -- I
5 am so new, I've been a CLEC for about three weeks.
6 Okay. So maybe we have -- last count I think there
7 was four, and just the last couple days I think we got
8 about 10 more, because we've been doing better. So
9 I'm very new into this, but, again, as far as the
10 business world and systems, very, very familiar with
11 systems. And in the beginning I just have to
12 compliment them, but it's new, in the beginning.

13 My main question was -- and this is how
14 Peter and I started talking -- is from a competitive
15 point of view and a level playing field, had to do
16 with pricing. And the fact is that GTE's base prices
17 seem to be higher than BellSouth's and their discount
18 seems to be lower.

19 Now, I'm sure you've heard that a lot
20 before, but the interesting thing that was brought to
21 my attention was when I got up one morning just as I
22 started and I read the newspaper and I saw an ad for
23 one flat rate for \$36.95. I don't know if the
24 Commission is aware of this, what's happening or not.
25 And this ad happens -- if you could see this logo

1 here -- happens to have GTE right on the bottom of the
2 logo, right in the bottom of the ad.

3 So I quickly called up my GTE service
4 manager and said, well, what's going on; how do I get
5 this rate; because anything that's for over 60 days
6 we're supposed to be able to get, according to the
7 tariffs.

8 So the next day I get a call back. He said,
9 oh, Steve, you don't have to worry about that; this is
10 GTE Communications Corporation. They're a CLEC.

11 Now, what they're authoring is \$36.95 for
12 unlimited local calling, 100 minutes of long distance
13 service per month, two calling features, such as
14 caller ID, call waiting, and voice mail, and they
15 don't charge activation.

16 Now, for a reseller to be able to purchase
17 this is going to cost us more than \$60. So I just
18 thought you might want to be aware of that. It's just
19 a statement. I don't know what more I can say about
20 it.

21 And I thank you for your time today.

22 **COMMISSIONER DEASON:** Any questions? (No
23 response.)

24 Okay. Thank you. I think now we can open
25 it up for questions from interested parties; is that

1 correct?

2 **MS. KEATING:** Actually, BellSouth had asked
3 for an opportunity to respond to some of the
4 questions.

5 **COMMISSIONER DEASON:** To respond or to ask
6 questions? If BellSouth would come forward.

7 **UNIDENTIFIED SPEAKER:** (Inaudible comment
8 away from microphone.) (Laughter)

9 I think what we'd like to do is, this really
10 has been your two days. We'll have an opportunity,
11 I'm sure, in future events to respond or ask
12 questions. So what we'd like to do maybe is make
13 Mr. Stacy available. If you have any questions or
14 concerns that have come from any of the presentation
15 today that we could respond to you on, we'd be glad to
16 do that, and otherwise we'll just -- we'll save ours
17 for another time.

18 **COMMISSIONER DEASON:** Any questions
19 Commissioners? Staff?

20 **COMMISSIONER CLARK:** I have questions of
21 Staff. Where do we go from here?

22 I think we've gotten some good information
23 about the different views about where we are with
24 respect to OSS. Is this now where we would go to the
25 process we discussed at Agenda last Tuesday; I guess

1 it was, two days ago?

2 **MS. KEATING:** That's the plan.

3 **COMMISSIONER CLARK:** Okay. All right.

4 **COMMISSIONER JOHNSON:** I had one question
5 for Mr. Stacy, and it's one that I teed up a bit when
6 he was making his presentation, and that was his
7 thoughts on the third-party testing and verification
8 process, and just your general thoughts on whether
9 that's a good process, how does it fit within what
10 BellSouth is doing, and how would you react to that
11 sort of a proposal.

12 **MR. STACY:** At the risk of offending
13 Mr. Gillan and Mr. Minnig, to some slight extent
14 they're about half right. There is merit to
15 third-party testing. However, when that third-party
16 testing duplicates work that has already been done,
17 the value diminishes and, in some cases, is lost.

18 For instance, there is very little need to
19 prove in BellSouth's case that someone can build an
20 interfaced TAG. I have a major corporation in Sprint
21 through Telcordia, AT&T on the preordering side, and
22 four or five other CLECs that will be making public
23 announcements in the next two or three weeks who have
24 already built that interface. So backing up the
25 portion of setting a third party out and saying can

1 this interface be developed at all is redundant.

2 When you look at the interface itself,
3 everything you heard today, except for LENS, dealt
4 with unbundled network elements. The testing of most
5 of the resale elements that we have been selling for
6 two years now through these interfaces is duplicating
7 work that's already been done. But with limits,
8 third-party testing brings the benefit of getting as
9 Mr. Minnig said, of getting us out of the unending
10 series of "we said, they said."

11 **COMMISSIONER JOHNSON:** One of the other
12 parties -- I think it was Supra -- stated that in
13 their opinion it would be easier to just have
14 BellSouth open up its own system, the RNS system, and
15 allow some sort of a use of that system, I guess with
16 sufficient safeguards.

17 Because I'm not familiar with those, how do
18 you react that to that? Why is or is it not a
19 feasible option?

20 **MR. STACY:** It is not a feasible option.
21 And, in fact, I'll take off my hat here and say that
22 I'm not the lawyer, but as I remember, the best I
23 remember, the Commission concluded that in a procedure
24 that we had that involved Supra; and the conclusion
25 was that we did not have to offer RNS.

1 It is a sales and marketing system for
2 BellSouth, first. So many of the sales and marketing
3 functions would have to be stripped out. That means
4 the software would have to be entirely rewritten.
5 Secondly, it only handles residence customers. It's
6 not adapted to business use.

7 You've seen my data yesterday about the
8 systems we use for business, and the CLECs are -- have
9 never expressed an interest to us in going after only
10 a residence customer.

11 We have had discussions before about making
12 RNS available and about how long it would take and
13 what it would cost, and each time the response from
14 the CLEC community has been "No thank you; we have to
15 go for both residence and business customers; we don't
16 want the sales and marketing things stripped out of it
17 that don't belong there, so we're not interested in
18 that."

19 But I can say that we have had -- have asked
20 for from a CLEC, and have never received, what we call
21 a new business proposal that says, make RNS available
22 to me with a fire wall, with the sales and marketing
23 information stripped off; sales and marketing
24 functions stripped off for residence customers only.
25 We would entertain that as a new business proposition,

1 and there's a method to go back through the account
2 team and ask us to do that. No one has, including
3 Supra.

4 **COMMISSIONER JOHNSON:** So it's not that it's
5 not technically feasible -- well, it's not that you
6 can't do it, it's just the cost?

7 **MR. STACY:** That's correct; it is --

8 **COMMISSIONER JOHNSON:** And that the request
9 has not been made to --

10 **MR. STACY:** It's technically feasible, but
11 functionality changes because, as I said, sales and
12 marketing things come out. It has limits in that it
13 works only for residence customers, and there is a
14 significant cost of making the modifications.

15 **COMMISSIONER JOHNSON:** And let me go back to
16 your one answer on the third-party verification
17 process. If I heard you correctly, there are -- I
18 guess there are elements of what you've done thus far
19 and systems that are in place that you are -- you feel
20 confident that they do work.

21 But you did mention most of the issues that
22 were discussed were in the context of UNEs, and I
23 guess we really haven't gone to the UNE PIC platform
24 kind of issues. But were you suggesting then for
25 maybe the UNEs that there may be a role for the

1 testing?

2 **MR. STACY:** Yes.

3 **COMMISSIONER JOHNSON:** Okay.

4 **MR. STACY:** And let me just mention one
5 thing. I wasn't going to try to be very specific, but
6 I will. BellSouth has made a commercial offer to
7 provide the UNE platform, and it has contracts with
8 two providers including a provider in the state of
9 Florida.

10 MCI examined that offer and chose not to
11 accept it because of the price. AT&T examined that
12 offer and chose not to accept it because of the price.
13 But we're not talking about an availability issue for
14 the loop/port platform. We're talking about a pricing
15 discussion that we're still having. And two providers
16 have already accepted that and signed the contract.

17 **COMMISSIONER JOHNSON:** And this is another
18 question along those same lines, and I probably should
19 have asked Mr. Green or Mr. Gillan also.

20 Why is it more costly, or why is it more
21 difficult to do? I'm not understanding, and maybe
22 just because I don't understand how you order the
23 elements and when you put them all together and have
24 it in a platform basis why is that so much more
25 difficult to preorder, order and process.

1 **MR. STACY:** It isn't. In fact, this
2 Commission's earlier order says that's exactly what
3 they get at resale and it ought to be priced that way.

4 **COMMISSIONER JOHNSON:** Oh. So it's not --

5 **MR. STACY:** This is not a technical
6 feasibility question. It's a --

7 **COMMISSIONER JOHNSON:** So it's not an OSS
8 problem.

9 **MR. STACY:** There was an OSS issue about how
10 would we order it, how would we provide for them to
11 order it, because the -- even though the same things
12 are being put together, the way they are used is
13 slightly different. But we provided those in tests to
14 AT&T in Kentucky as early as last -- I believe it was
15 September; it may have been October or November -- and
16 have been working on the systems processed to
17 provision them on a flow-through basis ever since
18 then.

19 **COMMISSIONER JOHNSON:** Okay. But at least I
20 better understand your answer. Your answer is that it
21 doesn't go to the OSS issues necessarily; it goes to
22 the price of the platform.

23 **MR. STACY:** Right. It would -- you know, it
24 would be -- if we did third-party testing, that's an
25 appropriate thing to test, because I haven't done

1 hundreds of thousands of those yet.

2 **COMMISSIONER JOHNSON:** Because no one is
3 ordering them because of the --

4 **MR. STACY:** No one is ordering them. And
5 these two customers that have signed up have just
6 signed up in the last -- literally in the last two
7 months to get it. But it's not an OSS question at the
8 moment; it's a price question.

9 **COMMISSIONER JOHNSON:** I got you. Thank
10 you.

11 **COMMISSIONER JACOBS:** Mr. Stacy, briefly,
12 what's your assessment of the critique of the EDI
13 flow-through issues, and to what extent are they
14 resolved through TAG?

15 **MR. STACY:** Let me give you two pieces of
16 information; not more than you want. But we have a
17 very significant dispute with MCI over why those
18 orders didn't flow through.

19 I think if you examine the transcript when
20 you get it, you'll find out that there were some
21 contradictions in the MCI representative's statements.
22 BellSouth never said that LNP orders would flow
23 through before March of 1999; and the orders that MCI
24 submitted that didn't flow through were submitted
25 prior to that, knowing that they wouldn't flow

1 through.

2 In addition, there were mistakes on both
3 sides. Those were early orders in the LNP system. It
4 was only activated in Georgia in August. MCI made
5 errors in putting data in fields that they shouldn't
6 that caused the orders to fall out for project
7 management. BellSouth made errors on the network
8 channel code that Mr. Green mentioned.

9 So the issue with that is, TAG doesn't
10 resolve that any better than MCI, but our testing
11 since the time that LNP has been active has resolved
12 that issue, and those orders do flow through when
13 they're properly ordered.

14 Again, that's probably an appropriate
15 subject for a third-party test to get out of the
16 finger pointing. Let's test one that's properly
17 configured and watch it flow through. Because I have,
18 and, you know, me saying that doesn't help MCI saying
19 it doesn't.

20 **COMMISSIONER JACOBS:** Thank you.

21 **COMMISSIONER DEASON:** Thank you, Mr. Stacy.
22 Does Staff have anything else at this time?

23 **MS. KEATING:** We don't have any other
24 questions, unless you wanted to open it up for a
25 little more discussion; but I don't know that there

1 STATE OF FLORIDA)
2 COUNTY OF LEON)


CERTIFICATE OF REPORTERS

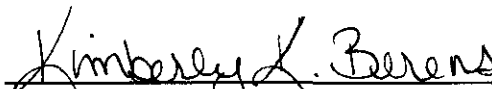
3
4 We, H. RUTHE POTAMI, CSR, RPR, and KIM
BERENS, RPR, FPSC Commission Reporters;

5 DO HEREBY CERTIFY that the undocketed OSS
6 Workshop was heard by the Florida Public Service
7 Commission at the time and place herein stated; it is
8 further

9 CERTIFIED that we stenographically reported
10 the said proceedings; that the same has been
11 transcribed by us; and that this transcript,
12 consisting of 513 pages, constitutes a true
13 transcription of our notes of said proceedings.

14 DATED this 19th day of May, 1999.

15
16 
17 H. RUTHE POTAMI, CSR, RPR
18 Official Commission Reporter

19
20 
21 KIMBERLY K. BERENS, CSR, RPR
22 Official Commission Reporter

23
24
25

\$

\$11,505.84 417/7
 \$120,000 415/22
 \$13,179 416/23
 \$15,000 379/9
 \$17 487/24, 488/2
 \$18
 \$29 495/15
 \$3,884.94 417/8
 \$36,190.68 417/10
 \$36.95 502/23, 503/11
 \$50,000 379/11, 379/20, 381/4, 499/8
 \$60 503/17
 \$9 487/23
 \$936 416/20

'93 401/18

1

1,000 424/15, 440/5
 10 384/10, 384/16, 391/11, 395/6, 396/17, 396/18, 396/19, 399/2, 399/11, 399/20, 409/4, 409/6, 409/23, 420/22, 448/18, 494/25, 501/2, 502/8
 10,000 483/1, 483/2, 483/5, 483/6
 100 503/12
 100% 414/1
 11 396/22, 478/16, 479/24
 11th 478/23
 12 396/22, 476/7, 481/1
 127th 382/14, 382/15, 383/3
 13 480/4
 130 473/1
 133 474/17
 14 476/18, 491/7
 148 367/18
 15 384/10, 396/22, 409/1, 444/3, 496/24
 15-minute 422/22
 17 414/9
 18 469/18
 19 414/3
 1999 367/15, 511/23, 514/10
 19th
 1:30 369/2

2

2 406/19, 406/20, 446/14
 2,000 424/16
 20 384/11, 397/3, 399/13, 409/1, 470/11
 20,000 417/10
 23 422/13
 24 428/20, 432/9, 436/7, 467/3, 469/19, 469/24, 491/3, 499/17
 25 383/20
 25th 406/18
 271 476/13, 483/25, 484/4, 485/21
 29 412/22, 414/1

3

3 367/7, 406/19, 409/23
 3,438 416/14, 416/24
 30 377/11, 383/13, 383/16, 383/20, 399/13, 399/20, 495/1
 30-minute 410/2
 385 390/19
 31% 414/4
 319 449/25
 32% 492/25
 35% 434/24
 367 367/8
 39 474/18

4

4 406/19
 4,000 440/3
 40 435/3
 40-store 501/1
 400 437/6
 402 368/5
 4075 367/18
 424 368/6
 433 368/8
 442 368/9
 45 369/7, 413/8
 45% 496/20

461 368/11
 48 428/20, 432/9, 499/17
 491 368/12

5

5 409/4, 409/6, 409/15
 5,000 440/2
 5.0 406/17, 407/6
 5/4/99 397/11
 50 369/7, 444/24
 50% 483/16, 418/14, 493/3
 500 368/14
 513 514/9
 514 367/8, 368/15
 561 390/20
 573 416/11, 416/14
 58 475/15
 59 475/16
 59% 414/9
 5:35 367/16, 513/17

6

6 367/15, 476/18
 60 377/11, 383/13, 383/20, 386/9, 389/12, 410/5, 492/10, 503/5
 60% 492/10
 600 417/13
 65% 414/2, 492/10
 68% 492/25

7

72 491/2
 75% 429/6
 7880 382/14, 382/15

8

8 481/10
 80% 440/4
 89.89% 492/22

9

9 397/4, 414/17, 481/10
 911 437/15, 437/19, 437/23
 954 390/20
 99% 467/3
 9:30 367/16

A

a.m 438/10
 abbreviations 393/12, 394/6, 441/19
 ability 371/19, 372/9, 372/15, 372/19, 375/12, 384/8, 392/24, 393/24, 394/4, 397/23, 398/2, 453/11, 453/13, 453/14, 455/10, 456/9, 459/23
 absorb 418/4
 abstract 471/1
 accelerate 450/18
 accelerated 442/2
 accept 396/19, 401/25, 509/11, 509/12
 accepted 509/16
 accepting 468/19
 access 370/18, 378/5, 395/24, 400/8, 400/22, 400/24, 421/4, 421/9, 427/3, 428/1, 428/9, 428/16, 428/24, 430/17, 455/23, 458/25, 495/23
 accessibility 464/4
 accommodate 475/25
 accommodation 435/22
 accomplish 443/15, 443/17, 445/22, 452/20
 account 375/7, 390/18, 390/19, 405/22, 405/23, 408/24, 406/3, 406/4, 406/5, 413/11, 463/22, 468/25, 469/1, 473/9, 508/1
 accounts 406/11
 accurately 500/5
 achieved 414/4, 414/5, 414/9, 444/11
 Act 434/11, 443/19, 444/8, 445/9, 449/11, 454/13, 457/2, 499/5
 activated 512/4
 activation 503/15
 active 512/11
 activities 463/23, 464/1, 481/18
 activity 410/21
 acts 455/7
 adapted 507/6
 add 485/9, 406/3, 427/3
 add/change/delete 405/23, 405/25, 407/4
 add/move/change 407/24

address 372/6, 372/11, 374/21, 375/1, 375/3, 377/15, 382/3, 382/11, 382/12, 382/13, 382/14, 382/19, 382/23, 382/25, 383/1, 383/3, 383/5, 383/8, 383/14, 390/17, 395/4, 395/9, 395/13, 404/16, 425/5, 425/6, 425/22, 426/4, 426/6, 426/10, 426/12, 426/16, 427/3, 427/15, 427/7, 427/11, 428/17, 430/14, 437/13, 437/19, 438/12, 441/13, 475/9
 addressed 407/6, 440/11, 475/11, 501/3
 addresses 383/9, 426/22, 440/25, 441/9, 441/20, 465/17, 465/19
 adequacy 462/16
 adequate 485/23
 adjust 475/24
 administrative 389/15
 advance 459/15
 advanced 449/17
 advantages 418/1
 advice 453/1
 advocating 463/17
 affiliate 370/22
 afford 441/7
 afternoon 423/12, 423/16, 433/22, 442/1, 461/17
 agency 373/10
 Agenda 504/25
 agent 441/9
 aggregate 490/22
 aggressive 419/3
 agonize 383/19
 agree 445/5
 agreed 398/13, 466/25, 467/7, 475/13
 agreement 390/12, 403/6, 435/24, 439/7, 439/20, 445/7, 445/9, 445/12, 446/22, 466/25
 agreements 434/3
 airplane 448/17, 448/19, 449/2
 Alabama 434/1
 ALECs 370/5, 370/20
 algorithm 490/14
 allotting 491/24
 allow 422/8, 506/15
 allowed 376/10, 420/19
 allows 421/12, 463/14
 Alternative 368/7, 373/13, 423/13, 425/9, 430/12, 461/22, 463/13, 482/13
 American 368/14, 500/14, 500/19
 amount 408/13, 408/15, 408/19, 411/12, 411/18, 414/6, 440/21, 492/12
 analog 467/4
 analysis 464/11, 481/13
 analyzing 464/6
 ancillary 455/25
 Andrea 402/21
 announcements 505/23
 answer 388/20, 408/22, 439/11, 452/12, 508/16, 510/20
 anticipated 480/5
 apartment 441/10
 API 425/16
 APIs 396/1
 Apologize 383/18, 409/18
 apple 370/23
 application 380/20, 395/24, 421/11, 425/10, 439/21, 462/10, 495/16, 496/15, 496/18, 497/16
 applications 395/25, 424/25, 425/1, 437/6, 496/12
 apply 444/16
 appointed 483/18
 appointments 438/7, 439/9
 appreciate 424/5, 440/17, 513/13
 approach 448/15, 453/9, 458/10, 463/17, 485/13
 appropriate 510/25, 512/14
 approval 485/21
 approximating 442/21
 April 380/2, 406/18
 area 388/3, 390/22, 404/23, 404/24, 427/22, 428/14, 430/18, 437/23, 463/3, 477/24, 477/25, 493/2
 areas 401/2, 432/16, 437/13, 437/14, 437/15, 438/6, 460/24, 483/19, 489/8
 argument 486/2
 arise 479/23
 Arkansas 434/5
 arrangement 450/19, 458/5
 array 376/18
 arrow 381/25
 arrows 392/15
 as-is 473/4, 473/21
 assemble 453/19
 assembled 454/21
 assembling 458/18
 assessment 511/12
 assets 454/6, 454/12
 assignments 473/22
 assistance 412/25, 413/7, 413/13
 associate 424/21, 433/20
 associated 483/23

Association 423/10, 423/18, 443/1
asterisked 406/16
AT&T 379/6, 404/4, 438/25, 440/12, 446/7, 459/24,
493/10, 505/21, 509/11, 510/14
Atlanta 378/16
Atlantic 447/2, 447/15, 459/12, 464/15, 466/25,
471/11, 476/1, 479/19, 481/11, 481/25, 482/1, 484/12,
484/14, 487/10
atmosphere 441/9
attached 423/5
attempt 437/19
attempted 412/1
ATTENDANCE 367/22
attends 477/11
attention 457/6, 457/7, 502/21
attentive 438/22
auditing 433/4
auditors 400/13, 400/16
August 512/4
authoring 503/11
authorization 425/4, 425/5, 430/11, 495/11
authorized 390/10
automatically 388/25, 497/9
autopick 386/22, 387/7
availability 509/13
available 376/25, 376/2, 376/13, 376/22, 377/1,
379/17, 384/6, 384/14, 388/2, 388/7, 397/25, 420/7,
421/20, 427/17, 427/18, 427/22, 428/12, 428/14,
428/16, 430/16, 430/18, 430/21, 430/23, 432/15, 446/6,
454/3, 458/12, 462/11, 469/21, 474/24, 480/15, 494/16,
494/17, 498/11, 504/13, 507/12, 507/21
average 409/2
avoid 381/15
awkward 382/14, 396/23

B

backing 450/25, 505/24
backs 407/22
bad 397/13, 419/5, 439/3, 441/7, 445/15, 490/3
balance 488/16
balances 373/23
base 418/13, 424/17, 472/3, 499/4, 502/16
based 371/16, 397/21, 398/1, 404/11, 404/23, 413/15,
442/25, 468/14, 471/18, 471/20, 472/10, 472/14,
472/18, 481/13, 482/17, 494/8, 495/5
basis 403/14, 509/24, 510/17
Bay 500/22
Beach 382/5
bear 483/15
bed 479/17, 479/20
Bell 375/17, 403/23, 405/21, 406/16, 406/24, 408/24,
418/14, 419/8, 420/18, 421/7, 421/18, 434/6, 435/19,
441/3, 447/2, 447/15, 459/12, 460/9, 464/15, 466/25,
471/11, 475/25, 479/19, 481/11, 481/25, 484/12,
484/13, 487/10
Bell's 421/1
Bellcore 460/13
BellSouth 371/7, 371/10, 373/17, 373/23, 373/24,
375/19, 378/5, 378/15, 378/16, 378/19, 378/25, 382/21,
384/3, 384/17, 385/9, 388/6, 388/23, 391/6, 396/4,
398/17, 399/1, 399/3, 401/4, 401/6, 403/6, 403/8,
411/23, 413/11, 414/7, 416/25, 420/21, 421/14, 424/18,
424/22, 426/9, 434/1, 434/3, 434/8, 434/9, 435/2,
435/3, 436/16, 437/21, 438/8, 438/16, 438/17, 438/20,
439/7, 439/10, 439/21, 440/3, 442/5, 442/22, 443/23,
445/10, 446/23, 450/14, 471/1, 492/5, 492/6, 492/21,
493/22, 494/1, 494/5, 494/12, 494/14, 494/17, 494/24,
495/2, 495/8, 495/19, 495/24, 496/3, 496/5, 497/25,
498/11, 498/13, 498/21, 498/25, 499/5, 499/15, 500/7,
504/2, 504/6, 505/10, 506/14, 507/2, 509/6, 511/22,
512/7
BellSouth's 379/10, 384/15, 420/14, 441/15, 462/10,
498/2, 502/17, 505/19
beneficiary 486/4
benefit 506/8
benefits 456/25, 462/7, 482/20, 485/13
Bentley 369/17
BERRENS 367/21, 514/4
Betty 367/17
Bible 468/10
bid 486/17
bidding 486/9
big 376/8, 378/20, 392/12, 404/4, 404/22, 406/21,
407/2, 415/16, 422/14, 427/13, 434/23, 493/12, 495/3,
496/11, 500/20
bigger 493/16
biggest 372/2, 372/5, 377/9, 377/10, 378/1, 439/14,
440/10
bill 406/4, 415/23, 433/2, 433/7, 435/5, 435/10,
435/12, 441/6, 455/13, 455/14, 455/22, 495/10, 495/18
billed 428/13, 495/14, 495/15
billing 390/16, 390/18, 393/10, 425/6, 425/13, 428/12,

434/24, 435/7, 435/12, 435/16, 455/9, 455/12, 455/17,
485/22, 485/25, 486/6, 488/24, 473/24
bills 434/25, 435/5, 455/18, 499/10
Birmingham 378/16, 379/25
bit 410/25, 424/9, 424/17, 433/9, 442/3, 450/2,
461/17, 461/21, 474/5, 505/5
blame 438/16, 438/17
blank 396/19, 396/23
blending 489/14
blash 458/15
bonding 472/8
book 393/20, 394/9, 394/18
books 393/22, 393/24, 393/25, 394/9, 394/10, 394/16
boring 454/14
bother 391/7
bottom 379/1, 474/2, 503/1, 503/2
bought 458/21, 470/23
box 386/17, 386/23, 386/24, 386/25, 389/20, 389/22,
394/22, 396/14, 396/22, 429/3, 430/25, 490/13
boxes 387/17, 387/20, 389/16, 396/20, 396/23
brand 423/18
Brazil 491/22
breadth 443/5
break 402/18, 422/22, 472/22
Brian 369/20, 369/24, 385/23
bridge 422/8
Brief 402/19, 422/23, 462/7, 500/20
bring 453/3, 479/5, 500/13
bringing 450/18, 496/9
brings 483/21, 506/8
broad 442/15
broken 400/10, 473/2
brought 370/3, 370/10, 402/25, 480/22, 500/9, 502/20
Broward 382/7, 393/23
build 379/15, 379/18, 453/15, 458/12, 460/23, 475/24,
481/19, 505/19
building 379/16, 453/7
built 379/17, 453/12, 453/18, 505/24
bullet 379/23
burden 483/15
burned 450/22
business 412/8, 414/18, 418/15, 418/17, 424/8,
424/10, 426/2, 429/2, 439/24, 444/4, 473/4, 473/10,
475/3, 481/7, 482/1, 482/18, 490/24, 491/9, 494/21,
496/10, 499/14, 499/15, 499/25, 501/1, 501/11, 502/10,
507/6, 507/8, 507/15, 507/21, 507/25
businesses 422/16
button 398/10
buy 378/14, 392/21, 447/13
buying 470/23
bypasses 411/9

C

cake 454/3
cages 453/22, 458/19, 458/25
calculate 397/20, 397/21, 398/10, 404/18
calculation 371/12
calendar 397/24, 397/25, 404/17
California 457/24, 460/7, 460/8, 460/9
call 375/5, 375/17, 375/19, 376/20, 377/17, 377/21,
377/22, 384/18, 384/20, 388/19, 388/24, 389/1, 389/2,
389/21, 389/22, 399/17, 406/6, 413/6, 427/23, 427/24,
428/6, 428/8, 428/11, 429/17, 432/21, 434/22, 439/23,
493/6, 494/11, 503/8, 503/14, 507/20
caller 427/21, 427/24, 428/8, 503/14
calls 374/23, 377/15, 428/15, 440/9, 454/10
came 397/24, 406/17, 416/17, 437/6, 437/9, 459/3,
460/10, 479/20, 488/23, 489/20
cancel 385/4, 499/16
cancellation 499/11, 499/14, 499/18
cancelled 438/18
capabilities 371/23, 403/13, 404/13, 404/20, 455/25
capability 453/12
caps 394/24
capture 458/6
car 448/12, 448/13, 448/15
care 428/7, 428/18, 429/10
Carol 369/17
carrier 370/22, 443/14, 444/24
carriers 386/12, 386/21, 386/23, 423/11, 442/19,
443/2, 443/14, 455/22, 455/24, 459/23
carry 485/4
cart 445/4, 446/15
cartoons 426/20
case 390/17, 397/14, 403/1, 407/25, 421/2, 446/23,
447/13, 473/7, 473/12, 475/12, 475/15, 488/15, 505/19
cases 385/3, 408/8, 408/16, 409/22, 470/11, 473/3,
475/6, 485/5, 505/17
catch 407/13, 413/21, 495/18
categorize 450/23
category 403/15, 414/11, 414/14
Cathy 402/23, 402/24, 408/22, 410/7, 411/9, 412/15,

412/23
Cathy's 411/16
caused 385/3, 440/7, 512/6
causing 379/1, 450/14
Center 367/17, 378/17, 378/21, 428/1, 469/10
Central 402/22
CERTIFICATE 368/15, 514/1
certificated 434/2
certified 463/24, 514/7
certify 394/22, 514/5
chain 501/1
CHAIRMAN 367/12
challenge 433/6, 496/4
challenges 500/25
change 390/21, 397/18, 405/9, 405/10, 405/24, 406/5,
407/4, 407/7, 415/3, 415/4, 417/10, 431/25, 432/12,
437/11, 439/16, 439/22, 450/15, 469/11, 469/12, 493/20
change/modify 405/8
changed 431/14, 432/22, 437/5, 437/9, 444/24, 475/17
changes 407/1, 432/19, 436/19, 436/21, 455/12,
460/25, 468/3, 475/25, 476/20, 477/1, 481/17, 508/11
channel 512/8
characters 426/20
charge 419/9, 503/15
charged 416/22, 416/23
charges 404/8, 417/2, 417/23, 433/3, 433/6, 455/23,
473/25, 474/1
Charles 424/21, 433/21
Charlie 423/14, 433/23
chart 407/19, 415/3
cheap 444/3
cheat 392/13
check 375/5, 386/16, 387/16, 387/20, 387/21, 389/19,
389/23, 394/22, 397/15
checking 371/23, 372/3, 372/17, 396/5, 493/4
Chesapeake 484/17
chief 433/23
choice 486/6
choices 383/4
choose 381/22, 381/23, 381/25, 383/9, 384/7, 384/8,
384/12, 384/19, 384/20, 386/2, 386/23, 396/9
chose 509/10, 509/12
Circle 383/3
circumstance 476/18
circumstances 450/4
cited 457/14
titles 394/11
citizens 489/1
city 393/12, 393/15, 394/5, 426/11
claim 381/5
clarification 372/1, 385/21, 398/22, 399/17, 408/20,
408/23, 409/3, 409/7, 409/17, 409/24, 412/10, 412/14,
412/18, 412/22, 413/14, 413/16, 421/18
clarifications 383/25, 405/13
CLARK 367/13, 372/21, 373/3, 373/9, 373/15,
386/13, 386/19, 387/3, 387/9, 387/13, 394/3, 394/12,
394/15, 398/15, 398/18, 410/15, 448/22, 487/5, 487/13,
504/20, 505/3
clear 408/3, 447/4, 474/9
clearinghouse 501/4
clearly 449/21
CLEC 379/8, 379/14, 380/6, 380/8, 390/17, 424/8,
430/23, 431/25, 435/20, 438/10, 439/16, 439/20, 440/2,
445/24, 446/4, 453/8, 453/16, 462/19, 463/23, 465/10,
469/16, 470/15, 470/22, 471/20, 472/6, 473/4, 475/23,
482/16, 485/22, 487/17, 489/8, 491/1, 491/25, 492/4,
493/15, 496/3, 502/5, 503/10, 507/14, 507/20
CLEC's 485/11
CLEC/ILEC 463/22, 464/1, 464/12
CLECs 370/5, 373/24, 374/5, 380/9, 381/7, 421/12,
421/20, 423/21, 430/9, 436/18, 440/13, 450/22, 451/3,
454/2, 454/21, 458/19, 463/6, 464/5, 467/18, 467/25,
469/8, 470/3, 470/6, 472/6, 472/9, 474/25, 475/1,
476/24, 485/14, 485/24, 489/10, 493/16, 496/6, 497/19,
497/25, 499/25, 500/8, 505/22, 507/8
CLECs' 374/6
client 424/17, 492/18, 494/2, 494/3
close 399/24, 418/14, 459/9, 475/14
closed 411/14, 411/21
closer 485/21
Closing 485/12
clue 385/2
chattering 390/14
code 390/22, 512/8
codes 393/16, 396/12, 410/23
collaborative 482/13, 488/18
collect 471/2
collected 481/12
collection 453/22, 454/3, 458/19, 458/25
column 384/14, 407/21, 407/25, 408/2, 408/7, 408/9,
408/13, 409/19, 409/21, 409/22, 411/18, 411/22, 412/1,
412/13
columns 407/20, 408/5, 408/12

combination 441/19, 489/12
combinations 445/14, 447/3, 447/25, 448/2, 448/3
comfortable 404/7, 417/19
Commenced 367/16
comment 391/6, 434/13, 504/7
Comments 489/21, 412/1, 412/13, 432/1, 434/7,
434/8, 488/20, 488/23, 501/6
commercial 443/13, 444/21, 447/18, 447/19, 451/17,
451/25, 459/8, 459/9, 459/10, 509/6
COMMISSION 367/11, 367/21, 456/14, 456/21,
462/3, 464/24, 465/1, 465/3, 465/4, 466/3, 466/14,
467/1, 467/7, 467/17, 472/13, 474/10, 476/16, 477/15,
478/1, 485/17, 487/1, 487/3, 487/11, 488/5, 489/1,
491/11, 500/10, 502/24, 506/23, 514/4, 514/6
Commission's 474/24, 479/19, 510/2
COMMISSIONER 367/12, 367/13, 367/14, 369/3,
372/21, 373/3, 373/9, 373/15, 374/15, 375/4, 375/10,
375/14, 375/20, 375/24, 376/16, 377/3, 377/5, 380/7,
380/11, 380/22, 381/1, 381/11, 385/5, 385/11, 385/16,
386/3, 386/13, 386/19, 387/3, 387/9, 387/13, 388/6,
388/10, 388/13, 388/16, 392/2, 392/5, 392/8, 394/3,
394/12, 394/15, 395/19, 396/24, 397/3, 398/3, 398/15,
398/18, 401/1, 401/6, 401/8, 401/11, 401/16, 401/19,
402/2, 402/7, 402/8, 402/13, 402/15, 409/5, 409/25,
410/14, 410/15, 411/2, 411/7, 418/8, 419/13, 419/17,
419/21, 419/24, 420/5, 420/9, 420/13, 420/24, 421/6,
421/15, 421/17, 421/24, 421/25, 422/6, 422/21, 422/25,
429/14, 437/24, 439/6, 439/13, 440/19, 441/21, 441/24,
446/12, 446/14, 448/22, 450/20, 451/15, 456/18,
456/23, 457/12, 457/17, 461/3, 461/4, 461/9, 466/6,
466/9, 466/20, 467/15, 468/11, 470/24, 471/23, 471/24,
472/20, 478/22, 480/3, 481/3, 484/5, 486/7, 486/8,
487/4, 487/5, 487/13, 487/20, 488/3, 488/9, 488/13,
489/15, 490/6, 490/11, 491/14, 491/15, 491/18, 502/2,
503/22, 504/5, 504/18, 504/20, 505/3, 505/4, 506/11,
508/4, 508/8, 508/15, 509/3, 509/17, 510/4, 510/7,
510/19, 511/2, 511/9, 511/11, 512/20, 512/21, 513/2,
513/7
Commissioners 423/2, 504/19
commissions 485/14
commitments 476/14
committee 491/24
common 422/8, 440/12, 493/2
communicated 405/3, 405/21, 478/14
communication 432/19, 436/19, 436/20, 494/6,
498/10
Communications 368/8, 423/15, 433/21, 433/24,
436/15, 439/2, 503/10
community 465/10, 472/6, 475/23, 487/17, 489/9,
507/14
companies 380/17, 381/4, 381/14, 423/22, 423/23,
423/24, 453/12, 471/25, 472/1, 472/2, 484/18, 489/3,
499/22, 499/24
company 379/8, 399/21, 402/22, 415/18, 424/10,
438/16, 438/25, 459/19, 481/24, 488/6, 489/2, 493/12,
494/25, 495/3, 496/3, 499/1, 499/18, 500/3, 500/21
company's 460/4, 495/23
comparable 445/1
compare 419/19, 467/12
comparing 399/5, 419/18, 456/10
compatibility 449/16, 449/23
compatible
compensated 456/19
compensation 455/24, 456/22
compete 370/15, 442/16
competible 495/4
competing
competition 444/25, 458/2, 501/8
competitions 486/1
Competitive 423/11, 443/2, 443/22, 497/20, 500/4,
502/14
competitors 381/9
complaints 404/23
complete 395/15, 398/19, 399/11, 399/14, 408/12,
416/10, 416/14, 425/5, 445/15, 446/10, 483/3, 484/23
completing 416/24
complex 406/7, 406/10, 415/1
complexity 481/16, 481/17
compliance 444/8, 464/20
complicated 442/10, 450/5, 450/8, 457/5
compliment 501/12, 502/12
comply 457/1
comprehensive 447/21
compress 469/3
CompTel-Acta 443/1
concentrating 424/19
concept 462/5
concern 417/4, 492/2
concerned 433/12, 489/11, 489/13
concerns 423/20, 424/3, 425/24, 428/7, 477/22,
478/10, 504/14
conclude 369/11
Concluded 367/16, 461/12, 471/10, 479/13, 506/23,

513/16
conclusion 462/7, 506/24
condition 452/8
conditions 445/14, 447/6, 447/7
conduct 443/8, 444/14, 453/19, 462/2, 491/2
conducted 461/24, 462/6, 464/16, 464/25, 476/16
conducting 452/21, 456/5, 465/23, 481/22, 486/16,
489/22
Conference 367/17, 466/4
confident 508/20
configured 482/11, 512/17
confirmation 405/12, 491/3, 501/23
confirmations 501/15
confirmed 497/1
confirming 444/8
confuse 403/17
confusing 407/13
confusion 371/9, 431/1
connect 437/20, 437/22
connected 440/3, 440/4, 440/7, 458/13
connection 378/23, 501/22
connects 454/4
conscientiously 403/10
conscious 404/10, 418/17
consensus 446/22
consequences 452/5
consideration 369/13, 499/23
consistent 403/14, 427/2, 432/4
constitutes 514/9
constructing 482/8
consumers 485/14, 486/5
contact 391/5
contacted 495/13
contacts 426/15
context 445/19, 508/22
continue 389/11, 389/13, 400/24, 440/16, 474/12
continued 404/2
continues 380/24
contract 373/10, 390/12, 435/23, 439/10, 479/25,
480/17, 480/22, 486/25, 487/7, 487/10, 487/25, 488/1,
496/14, 509/16
contracts 509/7
contractual 398/15, 479/9, 480/16
contractually 398/13
contradict 411/8
contradictions 511/21
contribution 454/21
contributor 372/2
conversion 405/6, 406/20, 406/25, 407/1, 493/22
conversions 435/17
Convert 405/21, 430/6, 430/7, 430/18, 431/1, 431/11,
431/18, 432/1, 432/2
converted 430/9, 435/19, 454/8, 455/1, 459/2
converting 430/22, 431/4, 431/24, 432/5, 454/25
converts 431/15, 431/17
coop 450/19
cooperation 483/24
cooperative 450/19
Corporation 503/10, 505/20
correct 375/9, 375/23, 376/24, 421/21, 448/13,
464/17, 473/14, 478/23, 488/13, 504/1, 508/7
corrected 474/14, 475/19
correction 475/2, 497/16
correctly 448/15, 448/19, 455/13, 455/14, 487/22,
508/17
corresponding 462/13
cost 380/18, 416/19, 417/9, 422/12, 487/4, 487/20,
487/21, 487/22, 503/17, 507/13, 508/6, 508/14
costly 509/20
costs 418/4
cottage 380/17, 381/13
count 380/4, 399/15, 399/16, 502/6
counterpart 443/5
county 426/12, 514/2
couple 371/4, 385/3, 387/25, 409/21, 425/23, 444/21,
457/18, 475/6, 502/7
course 381/10, 388/4, 398/7, 438/15, 464/19, 468/5,
472/23, 473/24, 474/9, 475/21, 476/17, 477/2, 477/22,
478/6, 479/15, 479/21, 482/9, 485/20, 486/4, 487/16
cover 422/17
covered 413/17
create 396/4, 447/9, 455/12
created 434/9, 458/4, 467/22
creates 406/5
creating 446/4
credibility 499/4
credit 372/15, 372/17, 373/5, 373/18, 435/14, 441/6,
441/7
credits 435/13, 499/4
cringe 429/6
criteria 466/10, 466/19, 476/13, 490/1
critical 418/20, 448/7, 454/19
critique 511/12

cross 454/4
cross-entry 443/19
CSR 367/20, 367/21, 384/17, 388/23, 390/7, 399/1,
514/3
CSRs 371/15, 372/18, 389/21, 399/22
cumbersome 374/11
currently 403/9, 416/22, 431/5, 460/1, 469/21, 470/7
custom 425/10
customer 371/6, 371/7, 371/8, 374/19, 374/23, 375/5,
376/5, 377/13, 377/15, 377/20, 377/21, 383/2, 383/10,
383/14, 383/22, 384/21, 384/23, 390/20, 390/23,
391/13, 393/21, 395/5, 398/1, 399/4, 399/15, 404/18,
406/23, 410/10, 410/18, 413/10, 413/12, 415/21, 425/3,
425/8, 425/12, 425/15, 427/23, 428/22, 429/2, 430/19,
430/22, 431/5, 431/10, 431/24, 432/2, 435/3, 435/5,
435/11, 435/14, 438/24, 439/1, 439/16, 439/22, 439/23,
441/1, 454/7, 459/2, 468/21, 469/2, 473/1, 473/4,
473/16, 473/18, 486/3, 493/17, 493/19, 493/21, 494/13,
494/14, 494/16, 494/21, 494/22, 495/6, 495/8, 495/9,
495/17, 497/14, 499/1, 499/6, 499/7, 499/9, 507/10
customer's 388/3, 391/15, 395/4, 469/1
customers 371/10, 372/18, 373/21, 373/22, 406/9,
410/11, 414/8, 415/20, 422/17, 424/16, 430/8, 435/18,
436/1, 438/23, 440/2, 441/2, 441/3, 441/4, 442/18,
444/4, 451/5, 454/25, 455/18, 455/23, 485/22, 495/25,
496/6, 497/23, 499/3, 502/2, 507/5, 507/15, 507/24,
508/13, 511/5
cut 373/25, 435/15, 441/5
cuts 459/1, 481/1
cycle 445/15, 468/21, 469/2, 473/17
cycles 456/6

D

D.C 484/16
Dade 382/7, 393/22, 393/23
dark 494/13, 494/14
Dashes 391/25
data 378/15, 378/16, 378/17, 378/21, 411/16, 427/2,
448/3, 449/17, 449/24, 507/7, 512/5
database 388/11, 388/14, 441/15
databases 384/16
DATE 367/15, 371/12, 371/16, 376/14, 385/21,
389/18, 389/24, 390/5, 397/8, 397/9, 397/11, 397/19,
398/4, 398/7, 398/11, 398/12, 404/18, 428/22, 432/10,
435/12, 494/16
DATED 514/10
dates 371/16, 397/25, 398/13, 398/16, 497/3, 501/20
day 374/22, 438/11, 442/18, 444/22, 444/23, 473/10,
476/23, 483/1, 483/3, 493/23, 494/3, 501/16, 503/8,
514/10
days 376/12, 376/15, 385/19, 385/25, 386/1, 388/4,
391/2, 397/25, 398/23, 411/18, 411/23, 413/8, 428/25,
429/2, 436/3, 438/13, 442/9, 467/4, 494/21, 494/25,
496/24, 497/12, 498/20, 498/21, 502/7, 503/5, 504/10,
505/1, 513/9
DD 390/4
de 445/23, 458/11
dead 447/20
deal 406/21, 432/22
dealing 372/18
deals 381/8
dealt 429/23, 506/3
DEASON 367/12, 369/3, 388/6, 401/8, 402/13,
402/15, 409/5, 409/25, 410/14, 411/2, 411/7, 418/8,
422/21, 422/25, 429/14, 437/24, 439/6, 439/13, 440/19,
441/21, 441/24, 456/18, 461/4, 461/9, 478/22, 480/3,
486/7, 491/15, 491/18, 503/22, 504/5, 504/18, 512/21,
513/2, 513/7
debatable 374/4
debate 463/15
debt 499/19
debugged 444/2
decide 380/9
decided 457/16
decision 399/8, 403/10, 418/17, 420/6, 420/8, 420/9,
476/20
declared 467/25
dedicated 378/4
deficiencies 433/15, 458/16
Define 454/23, 455/9
defined 451/13, 467/10, 468/5, 474/16, 474/19, 490/13
defining 454/15, 464/7, 481/21
definition 469/14, 480/12
Delatour 491/18
Delaware 484/19, 484/21
delay 410/20, 411/3
delete 405/9
delinquent 373/22
deliver 455/10
deliverable 478/12
delivery 398/13, 398/14, 449/14, 455/11, 463/8
demands 452/5

demo 370/4, 371/14, 372/4, 372/8, 381/17
demonstrate 462/15, 462/22, 463/2
demonstrates 485/25
demonstration 422/4
denial 435/11, 439/18
depended 489/9
dependent 476/3, 476/19
depends 411/4, 471/8, 476/12
deploy 449/17
deposit 373/8
deposits 441/7
describe 475/9
described 422/1
design 445/11, 445/20, 446/2, 446/11, 447/8, 447/17, 451/8, 452/2, 456/15, 460/9
designed 392/22, 404/15, 405/1, 405/5, 405/11
designing 444/9, 452/14, 452/19, 459/6
desired 389/18
desk 413/6, 413/12, 428/6, 428/7, 429/9, 469/9
detail 377/7, 412/16, 433/1, 433/9, 444/15
detailed 478/19
determination 467/14
determinations 467/19
determine 373/8, 375/21, 397/9, 466/11, 466/13, 471/4, 488/10, 491/12
determined 488/14
develop 380/5, 380/8, 381/14, 442/12, 459/23, 462/15, 476/8, 480/15, 480/23
developed 379/12, 420/19, 421/8, 421/11, 425/11, 469/20, 472/24, 472/25, 481/4, 481/5, 490/21, 506/1
developer 381/3
developing 442/7, 457/2, 460/20, 473/13, 476/5, 479/6, 480/1, 486/14
development 379/23, 381/15, 456/17, 465/15, 470/1, 478/25, 479/5, 480/11, 480/19, 485/7, 488/14, 488/17, 489/21
device 492/21, 496/16
diagram 424/23
Dial 368/14, 377/17, 500/14, 500/19
dial-up 378/11, 378/23
dialing 389/3
dialogue 495/12
difference 472/11
differences 482/7, 484/15, 485/9, 485/10, 488/22, 489/9
differential 402/9
difficult 376/8, 411/5, 415/12, 427/15, 437/14, 442/11, 509/21, 509/25
difficulties 371/14, 400/3, 450/24, 463/10, 483/23
difficulty 400/1, 463/6
digits 390/22
dimensions 463/19
diminishes 505/17
dipping 484/8
direct 428/9, 485/13
direction 412/25, 418/2, 465/2, 487/2
directions 437/18
director 416/1
directories 393/19
directors 416/7
directory 393/23, 394/1, 394/19, 394/23, 395/2, 395/10
disadvantage 417/17
disappear 436/6
disappeared 493/8
disappointed 378/24
disappointing 436/5
disconnect 414/13, 414/16, 414/19, 416/12
disconnected 439/25
disconnects 405/6, 414/13, 414/17, 415/2
discount 502/17
discuss 444/18, 491/12
discussed 445/18, 463/9, 468/2, 504/25, 508/22
discussion 509/15, 512/25
discussions 460/3, 507/11
dispatched 494/12
displays 384/11
dispute 433/6, 435/7, 511/17
disputes 434/24, 457/10
disseminated 439/1
distance 386/11, 386/21, 406/23, 442/23, 443/24, 444/1, 444/24, 463/5, 464/22, 491/25, 495/22, 496/2, 499/8, 503/12
distribute 436/18
distributed 436/12
district 426/7, 426/19, 426/22, 427/1
diversity 452/4
docket-type 467/21
docketed 467/17
document 490/5
documentation 445/25, 446/10, 453/15, 462/14, 469/8, 475/17
documents 446/6

DOE 421/9
doesn't 372/11, 374/8, 380/4, 390/24, 391/22, 393/12, 399/14, 399/16, 437/23, 438/17, 448/8, 493/12, 510/21, 512/9, 512/18, 512/19
DOJ's 462/9
dollars 379/8
domain-specific 477/22
domains 477/17, 477/18, 483/20
draft 466/1, 467/22, 488/19
dramatic 493/18
dramatically 415/3
draw 437/16
drive 382/14, 382/16, 448/12, 448/13, 448/14
drop 436/8
dropped 499/12
duplicate 372/9, 372/13, 375/3
duplicates 505/16
duplicating 506/6
duplication 374/16
during 416/20, 425/25, 429/19, 430/18, 438/11, 447/4, 474/9, 475/21, 476/7, 476/17, 477/22, 479/21, 481/18, 485/23, 487/15, 489/21, 489/22

E

ease 399/6
easier 506/13
Easley 367/17
easy 411/14, 444/17
EDI 369/24, 379/7, 400/3, 403/11, 421/8, 445/19, 471/2, 471/6, 472/1, 472/7, 473/14, 481/6, 481/7, 481/10, 511/12
EDI-based 472/15
EDI-like 471/12
edit 372/3, 396/5, 397/14
editing 392/3, 392/6
educational 453/4
effect 379/15, 442/14, 454/12
effective 420/1, 426/4, 457/21, 475/22, 513/13
effectiveness 462/16
efficiency
efficient 419/25, 420/4, 426/4, 450/17, 464/12
efficiently 446/11
effort 404/10
Eight 414/18, 476/6
electronic 417/3, 419/17, 419/21, 425/17, 468/18, 472/8, 476/8, 481/9, 489/13
electronically 408/6, 408/10, 414/2, 414/20, 414/22, 417/5, 417/8, 417/16, 417/21
element 447/3, 456/1
elements 445/14, 446/20, 447/24, 448/3, 449/24, 450/1, 455/10, 455/14, 506/4, 506/5, 508/18, 509/23
eliminate 513/11
emphasis 459/5
emphasize 432/14
employees 422/13
encompasses 448/6
encourage 456/16
end 379/10, 395/20, 402/24, 446/10, 451/10, 456/4, 458/9, 460/25, 476/22, 477/2, 479/14, 486/2, 486/3, 491/7, 493/25, 498/17
ends 379/10
English 426/11
enjoy 370/11
ensured 496/17
ensures 478/13
enter 372/10, 377/18, 381/21, 382/11, 382/13, 382/15, 382/22, 383/8, 386/17, 390/5, 391/24, 396/17, 396/18, 405/11, 410/3, 410/24, 425/15, 430/11, 441/16, 463/4
entered 371/20, 374/21, 375/1, 390/7, 391/16, 391/19, 391/20, 397/11, 397/17, 474/6
entering 391/22, 396/16, 469/9
entertain 507/25
entrant 445/17, 447/13, 453/14, 453/17, 454/8, 455/19, 456/2, 458/11
entrants 442/15, 442/17, 445/10, 446/9, 446/24, 447/10, 448/1, 449/15, 450/15, 453/6
entry 420/20, 428/24, 430/25, 444/1, 445/15, 447/14, 447/20, 447/22
environment 424/8, 455/8, 486/1, 488/19
equal 370/20
equally 498/24
equipment 492/5, 493/15
equivalent 421/13, 421/18, 421/19, 427/25
error 371/22, 390/25, 392/17, 413/15, 435/5, 448/7, 470/12, 501/19
errors 382/23, 392/17, 434/25, 435/6, 449/9, 470/13, 470/16, 501/17, 512/5, 512/7
Explanade 367/18
establish 463/22, 466/18, 466/21, 489/18, 489/19
established 476/14, 490/3, 490/4
establishes 463/14
establishment 407/24

evaluate 380/18, 442/8, 460/18, 482/6
evaluates 463/18
evaluating 466/10, 485/16
evaluation 460/14, 462/9, 464/19, 465/24, 474/9, 475/21, 476/13, 477/3, 477/7, 478/21, 482/15
evaluations 469/6
events 504/11
evidence 462/15
examine 511/19
examined 509/10, 509/11
Excel 426/24
exception 464/13, 474/6, 474/16, 474/22, 475/14
exceptions 405/17, 405/18, 407/11, 413/18, 415/8, 456/8, 475/16, 477/4, 479/15
excess 415/21
exchange 390/12, 393/20, 423/11, 428/1, 443/22, 501/3
exchanges 393/22
exclusivity 497/22
Excuse 395/19, 429/14, 478/22
exercise 454/17, 458/1, 478/8, 483/9
exist 383/4, 469/23, 469/24
existed 469/22, 488/22
existing 400/6, 405/8, 406/1, 406/3, 406/4, 443/14, 459/25
expect 440/16, 450/3, 450/6, 455/7, 470/7
expectations 470/17
expected 379/2, 398/7, 442/22, 447/14, 447/19, 448/1, 456/3, 467/13
expedite 389/19, 389/22
expedited 394/17, 394/18
expense 380/14
expensive 379/6, 379/7, 379/19, 381/16
experience 372/6, 378/22, 386/1, 440/20, 452/1, 470/14, 481/15, 500/24
experienced 411/3, 450/24, 493/18
experiences 418/11, 424/1
experiencing 470/15, 492/20, 500/17
experimented 426/14
expert 457/11
explanation 493/6, 493/7
expose 499/18
expressed 507/9
extended 448/2
extreme 441/14
eyes 452/10, 498/9

F

facilities 454/4, 454/10
facilities-based 422/14
facility 495/5
facility-based 492/4, 493/16
facing 381/16
fact 382/7, 391/20, 406/10, 445/8, 450/11, 502/16, 506/21, 510/1
fact-based 485/15
factor 483/11, 483/12, 495/3, 496/11
factors 461/24, 497/23
facts 463/11, 463/14, 463/15
fail 490/24
failure 429/16, 466/15, 471/6
Fair 492/10, 493/9
fairy 498/8
fall 409/24, 412/21, 512/6
falls 374/4, 408/23, 412/17
family 384/24
fashion 442/2
fast 378/18, 378/20, 456/12
faster 378/11, 378/23, 379/3
fault 474/21, 475/10, 475/12
faulty 475/17
Fax 401/21, 401/25, 402/2, 433/14, 436/4, 496/15, 496/20
faxed 402/11
faxing 433/13, 496/22
FCC 449/24, 466/13, 467/8, 499/23, 500/9
FCCA 368/10, 441/25, 443/4
feasibility 510/6
feasible 400/19, 506/19, 506/20, 508/5, 508/10
feature 428/7, 428/13, 429/20
features 387/20, 388/10, 388/12, 388/13, 389/1, 389/3, 396/11, 396/15, 396/17, 399/6, 404/16, 405/9, 405/23, 407/4, 425/6, 428/17, 429/4, 429/8, 430/5, 430/20, 430/23, 432/10, 432/15, 503/13
February 379/24, 380/1, 380/2, 415/20, 479/14
federal 464/20, 478/7
Fee 416/21, 416/22
feedback 468/1, 468/4
fees 416/25, 417/6, 495/15
fell 408/20, 412/9, 412/14, 413/14, 413/16
Felz 421/10
fiduciary 426/2

field 389/25, 390/3, 434/10, 473/22, 486/2, 502/15
 fields 390/2, 512/5
 fifth 473/9
 figure 382/4, 393/13
 file 371/21, 375/6
 filed 466/25
 filing 483/25, 484/4
 filings 478/14
 fill 389/17, 389/18, 467/9
 filled 435/6
 filling 391/7
 finagle 383/22
 finalizing 466/5
 financial 433/23, 487/8
 find 373/22, 375/14, 376/12, 398/12, 409/20, 414/16,
 427/21, 432/20, 432/23, 435/10, 437/1, 457/15, 494/1,
 496/18, 496/20, 496/21, 497/5, 511/20
 finding 475/5, 495/12
 fine 376/12, 417/21
 finger 512/16
 fingers 493/9
 finished 397/17
 fire 429/19, 507/22
 firm 405/12, 491/2
 fit 505/9
 five 399/2, 399/11, 399/20, 399/22, 408/16, 414/21,
 416/7, 429/1, 493/21, 499/10, 499/17, 505/22
 five-minute 402/18
 fix 415/11, 494/18
 fixed 406/19, 433/8
 flat 502/23
 flavors 376/25
 flip 384/9, 415/14
 FLORIDA 367/1, 367/19, 384/5, 402/23, 403/8,
 434/2, 436/14, 440/17, 478/21, 509/9, 514/1, 514/5
 flow 414/12, 511/18, 511/22, 511/24, 511/25, 512/12,
 512/17
 flow-through 414/3, 415/3, 510/17, 511/13
 flowed 414/4, 414/21
 flows 413/3, 415/9
 fly 448/17, 448/18, 476/1
 flying 491/22
 FOC 398/8, 402/10, 428/21, 428/22, 432/8, 493/4,
 494/2, 496/25
 FOCs 433/17
 focus 369/24, 369/25, 442/5
 focused 369/23, 472/13, 472/14
 focuses 463/21
 focusing 462/23, 472/9
 folks 374/7, 382/16, 392/13, 412/20, 412/23, 418/25
 follow 402/6, 581/9
 follow-up 429/9
 followed 459/3, 468/23, 468/24
 forecast 480/13
 forecasts 476/5
 foreseeable 464/10, 465/20, 469/17, 482/23, 483/1
 form 412/5
 formal 467/21
 formality 513/12
 format 390/2, 391/24, 393/10, 397/12, 426/25,
 473/14, 481/7, 481/9, 481/10
 formatting 389/25, 390/6, 391/18
 forwarding 376/20, 388/20
 found 379/5, 404/12, 405/16, 406/14, 429/24, 437/7,
 464/17, 474/13, 474/19, 475/15, 478/8, 482/19, 493/5
 four 376/15, 379/21, 388/4, 391/2, 398/23, 403/25,
 412/6, 414/21, 416/13, 433/25, 435/8, 436/4, 437/4,
 438/13, 497/12, 499/10, 501/18, 502/7, 505/22
 four-month 381/15
 fourth 403/20
 fox 460/10
 FPSC 367/21, 514/4
 frame 420/3, 435/25, 478/25, 479/15
 fraud 499/19
 Fred 391/19, 391/21
 frequency 470/13
 frequently 438/21
 fresh 396/19
 Friday 416/17
 friendly 501/9
 friends 384/24
 front 395/3, 395/20, 423/13, 446/10, 458/9, 463/14,
 466/19, 466/22, 467/10, 490/4
 front-ended 378/3
 frustrated 484/2
 frustration 492/1, 492/12, 492/18, 494/19, 497/19
 fullish 496/5
 function 396/21, 408/2
 functional 417/25, 483/19
 functionality 422/2, 422/9, 485/3, 508/11
 functions 422/20, 469/9, 490/9, 507/3, 507/24
 funding 486/22, 486/23
 funds 422/18, 487/3, 500/1

future 449/10, 469/17, 470/7, 470/23, 481/20, 484/4,
 504/11

G

gain 370/14, 478/19
 gal 399/3
 game 447/12
 gaps 467/9
 GARCIA 367/12
 gather 410/13
 geared 472/18, 489/10
 generate 455/21
 generated 430/1, 473/11
 generating 473/23
 generator 476/9, 480/18, 488/1
 generic 460/5
 gentleman 400/12, 497/8, 500/13
 gentlemen 400/3
 geographic 452/4
 Georgia 512/4
 glad 504/15
 glitch 387/1
 goal 399/11, 422/7, 444/20, 451/10
 goals 444/10
 grappling 370/17
 greater 486/5
 gripe 386/7
 ground 369/11, 447/1
 group 381/8, 424/2
 groups 477/13
 grow 440/15, 440/16
 GTE 401/3, 403/8, 418/10, 418/15, 418/17, 434/4,
 500/14, 500/17, 500/21, 501/7, 503/1, 503/3, 503/10
 GTE's 502/16
 guess 373/19, 375/4, 382/3, 382/6, 382/11, 384/11,
 388/22, 396/15, 407/13, 415/6, 419/2, 419/7, 419/10,
 420/5, 422/12, 440/13, 471/25, 490/8, 490/11, 504/25,
 506/15, 508/18, 508/23
 guesses 383/11
 guesstimate 409/16, 411/17
 GUI 379/12, 471/12
 guidance 415/10
 guide 392/12, 411/22, 411/24, 414/7
 guidelines 407/17, 464/20
 guide 491/11
 guy 396/20, 439/3
 guys 379/25, 420/21

H

half 380/3, 391/14, 413/6, 424/15, 493/2, 493/20,
 505/14
 hand 429/23, 478/3, 496/23, 497/22
 handle 374/6, 405/1, 405/5, 407/1, 410/11, 444/20,
 447/17, 449/22, 451/22, 453/11, 470/25, 475/19
 handled 400/23
 handles 507/5
 handling 402/12
 handout 403/19, 403/21
 hands 447/2
 happy 487/18
 hard 416/4, 470/25, 499/1
 harder 387/17
 hardly 434/22
 hardware 379/9
 harness 479/16
 hat 506/21
 head 395/23
 healthy 496/1
 hearings 479/21, 480/2
 heart 465/22
 heavily 458/22
 heavy 406/13
 help 413/6, 413/12, 428/6, 428/7, 429/9, 444/9,
 450/12, 451/12, 452/11, 467/18, 469/9, 512/18
 helped 481/20
 helpful 376/17, 435/25, 436/17
 helping 399/10
 helps 483/20
 hen 460/11
 hesitance 450/21
 Hewlett 480/25, 481/3, 481/5
 HI 410/9
 hiatus 480/21
 high 371/5, 392/19, 444/13, 444/16, 452/16, 454/17,
 457/25, 458/16, 470/9, 471/25
 higher 378/9, 381/6, 502/17
 highlight 371/4, 398/25
 highlights 370/2
 hired 399/3, 460/17
 historical 411/15

history 373/21, 377/16
 hit 386/17, 387/5, 396/18, 396/22, 397/3, 398/10,
 417/23
 hitters 406/13
 Hold 380/22, 409/1, 410/12
 holding 410/18
 hole 407/3
 home 494/23
 homework 500/12
 honestly 404/21
 hooked 438/19
 hope 407/13, 462/24
 horse 445/5, 446/15
 host 455/12, 473/19
 hot 459/1
 hour 391/14, 399/19, 513/5
 hours 416/20, 428/20, 432/9, 436/7, 467/3, 491/2,
 491/4, 499/17, 501/16
 house 437/17, 437/21, 438/5, 460/11
 hundred 436/25
 hundreds 445/2, 511/1
 hunting 405/25, 406/1
 hurt 448/25, 449/1

I

ID 427/21, 427/24, 428/8, 583/14
 idea 379/18, 393/16, 412/21, 424/9, 430/20, 445/16,
 492/15
 ideal 427/9, 476/2, 476/18
 identified 429/18, 430/3, 444/12, 451/5, 454/16
 identifies 446/1
 identify 444/17, 448/4, 451/7, 452/15, 454/2, 474/21
 II 465/22, 466/6, 489/21
 III 465/24, 466/7
 ILEC 439/17, 445/25, 453/8, 455/13, 455/14, 455/15,
 455/20, 455/21, 457/1, 464/10, 465/6, 467/8, 467/25,
 468/17, 471/8, 473/2, 474/23, 475/4, 476/9, 476/25,
 480/14, 482/16, 483/25, 485/20, 485/25, 486/23, 487/1,
 487/3, 487/9, 487/18, 489/7
 ILEC's 442/5, 453/11, 464/5, 473/15, 478/20
 ILECs 370/18, 454/22
 imagine 406/21
 immediate 428/24
 impact 397/19, 415/16
 implement 417/24, 422/19, 493/3
 implemented 443/12
 implementing 371/2, 492/19
 implication 490/24
 implications 491/9
 importance 458/17
 impose 417/1
 imposed 404/9
 impressed 501/7, 501/19
 impression 385/2, 410/17, 420/17, 477/6
 improperly 397/17, 436/22
 improve 418/6, 422/20
 improved 485/22, 486/3
 improvement 433/14, 433/16, 436/3, 440/24, 450/14
 improvements 464/11, 464/16
 in-house 425/11
 in-region 464/21
 in-store 455/25
 inaudible 373/6, 373/10, 373/19, 375/8, 375/18,
 375/22, 376/23, 504/7
 income 496/9
 inconsistent 427/8, 431/22
 incorporate 468/3
 incorporated 423/19
 incorrect 394/25, 398/21
 independent 400/13, 400/16, 462/12, 463/12, 485/12
 indicate 369/6
 indicated 379/2, 410/2, 410/14, 451/16
 indicates 439/7, 480/4
 indicating 371/3, 388/21, 389/5, 389/6, 391/23,
 392/12, 392/16, 392/18, 394/2, 395/12, 395/18, 396/8,
 405/18, 406/19, 407/8, 413/23, 416/21
 indication 426/5, 426/10, 429/15
 industry 380/17, 381/13, 440/12, 440/14, 442/12,
 443/22, 493/13, 496/1
 inefficient 427/15
 inexpensive 444/3
 information 373/1, 374/14, 377/18, 390/9, 394/2,
 395/2, 395/10, 399/18, 409/12, 410/13, 411/15, 412/2,
 415/10, 425/9, 426/1, 426/17, 427/6, 427/10, 430/15,
 436/10, 436/17, 440/8, 455/17, 458/12, 462/11, 475/23,
 491/25, 504/22, 507/23, 511/16, 513/12
 informative 513/10
 informed 487/16
 infrastructure 498/1
 initial 453/2, 453/3
 innovation 486/5
 input 370/10, 382/4, 399/5, 409/6, 411/13, 453/5

inputs 465/12, 466/5, 470/1
 inserted 389/11
 insight 485/17
 install 405/25, 406/3, 406/4, 427/18, 431/20
 installation 381/24, 404/17, 427/23, 428/23, 429/3,
 429/19, 431/9, 431/12, 432/10
 installed 429/4, 429/8, 429/12, 429/21, 432/11, 432/16
 installs 405/5, 406/15, 412/7, 431/17
 institute 474/15
 instruction 448/16, 448/20
 instructional 392/9
 intention 484/4
 intentions 442/11
 interactions 464/12, 473/1
 interconnection 460/4
 interconnects 370/23
 interest 467/25, 507/9
 interexchange 442/19
 interface 374/9, 374/10, 379/11, 379/12, 379/15,
 380/5, 390/9, 395/25, 420/7, 421/12, 424/20, 425/17,
 428/2, 445/20, 446/2, 446/4, 446/5, 459/23, 459/25,
 460/4, 471/2, 472/8, 472/14, 472/15, 476/8, 476/19,
 479/6, 480/10, 480/14, 480/23, 481/4, 501/14, 505/24,
 506/1, 506/2
 interfaced 505/20
 interfaces 424/22, 446/11, 453/7, 453/15, 453/18,
 458/13, 472/10, 482/7, 489/13, 506/6
 interference 380/21, 380/24, 385/13, 484/17
 interLATA 387/10, 387/12
 internal 373/21, 391/5, 421/1
 internally 370/19, 421/11
 internet 410/21, 410/22, 411/5, 419/22, 419/23,
 421/12, 501/14
 interval 411/22, 411/24, 414/7
 intervals 398/14
 intraLATA 387/11
 introduce 423/3, 443/15
 introduced 406/18
 introduction 369/6, 370/12
 invalid 390/8, 397/12, 440/25, 441/13
 inverted 450/10
 invested 378/13, 408/13
 investment 380/13
 involvement 478/13, 478/17
 irate 440/6
 IRES 418/22, 419/12, 419/14, 419/15, 419/19,
 420/14, 420/17, 426/25, 421/11, 425/20, 427/4, 427/7,
 427/17, 428/19, 433/14
 ISDN 378/11, 378/23, 414/19, 414/25
 issue 371/12, 374/6, 427/13, 428/16, 430/14, 455/17,
 456/11, 469/11, 474/20, 474/25, 475/1, 495/7, 495/8,
 495/14, 498/13, 499/20, 509/13, 510/9, 512/9, 512/12
 issues 370/2, 370/17, 371/5, 371/11, 379/4, 392/21,
 400/21, 404/25, 407/6, 415/11, 418/22, 419/12, 424/1,
 429/10, 432/10, 432/18, 432/24, 449/23, 477/12,
 477/23, 477/25, 478/3, 479/9, 479/20, 479/22, 499/6,
 501/3, 508/21, 508/24, 510/21, 511/13
 ITEM 368/3, 375/25, 412/11, 427/16, 429/5, 446/14
 items 425/23, 440/11, 445/13, 467/2
 iterate 457/8, 457/9, 457/10
 iterative 450/16
 iteratively 446/9

J

Jackson 433/24
 JACOBS 367/14, 388/10, 388/13, 388/16, 392/2,
 392/5, 395/19, 398/3, 402/8, 421/25, 422/6, 450/20,
 451/15, 471/24, 472/20, 488/3, 488/9, 488/13, 489/15,
 490/6, 490/11, 491/14, 511/11, 512/20
 Jay 369/20, 369/23
 jazz 400/10
 Jeff 424/6, 436/10
 Jerry 501/24
 Jersey 484/10, 484/19, 484/21
 job 494/10
 JOE 367/12
 John 421/10
 JOHNSON 367/13, 374/15, 375/4, 375/10, 375/14,
 375/20, 375/24, 376/16, 377/3, 377/5, 380/7, 380/11,
 380/22, 381/1, 381/11, 385/5, 385/11, 385/16, 386/3,
 392/8, 396/24, 397/3, 401/1, 401/6, 401/11, 401/16,
 401/19, 402/2, 402/7, 419/13, 419/17, 419/21, 419/24,
 420/5, 420/9, 420/13, 420/24, 421/6, 421/15, 421/17,
 421/24, 446/12, 446/14, 457/12, 457/17, 461/3, 466/6,
 466/9, 466/20, 467/13, 468/11, 470/24, 471/23, 481/3,
 484/5, 486/8, 487/4, 487/20, 502/2, 505/4, 506/11,
 508/4, 508/8, 508/15, 509/3, 509/17, 510/4, 510/7,
 510/19, 511/2, 511/9
 joint 500/16
 JULIA 367/13
 June 440/17

K

Kentucky 510/14
 key 406/8, 408/14, 408/15, 409/14
 keyed 411/19
 keying 420/2
 kick 441/17
 KIM 514/3
 KIMBERLY 367/21
 Klein 500/19
 knowledge 449/15, 453/3
 known 460/25, 470/16
 KPMG 368/11, 461/11, 480/25

L

labor 416/19
 lack 372/2, 372/6, 380/13, 490/8
 ladder 498/17
 lady 438/13, 492/14
 lag 385/11
 LAN 378/4, 378/7, 378/8
 large 373/23, 415/25, 422/18, 442/19, 443/3, 446/7,
 457/1, 482/16
 larger 406/9, 472/6
 largest 415/19
 later 376/12, 384/17, 385/19, 386/1, 388/4, 390/7,
 391/2, 479/18, 479/20
 latest 379/19
 laugh 389/21
 Laughter 504/8
 lawyer 506/22
 layouts 404/14, 405/2
 LCSC 412/10, 412/21, 412/24, 415/11, 415/25,
 427/25, 434/14, 436/23, 437/3
 LD 444/4
 learn 448/17
 learned 480/8, 481/16, 489/24
 learning 449/3
 lease 300/14
 leave 415/15
 leaves 407/2
 leaving 410/10
 LEC 401/2, 420/8, 420/10, 439/23, 458/21, 494/6,
 496/24
 LECs 422/9, 455/10
 left 441/11, 494/13
 LEGACY 421/13, 421/22
 legal 447/5
 length 398/24, 398/25, 476/11, 492/12
 lengthen 476/24
 LENS 369/25, 370/3, 370/4, 370/7, 371/1, 371/6,
 371/16, 371/18, 372/7, 372/11, 372/18, 374/7, 376/1,
 376/11, 377/7, 377/10, 377/18, 377/23, 378/6, 378/8,
 378/12, 379/16, 381/17, 384/3, 388/14, 388/15, 392/2,
 392/5, 393/6, 393/25, 398/2, 399/7, 399/14, 401/13,
 401/20, 401/22, 401/24, 402/1, 402/10, 403/3, 403/9,
 403/13, 403/16, 403/24, 404/9, 404/10, 404/12, 404/15,
 404/20, 405/1, 405/13, 405/19, 406/7, 406/15, 406/17,
 408/1, 408/6, 410/3, 413/19, 414/1, 414/2, 415/7,
 416/3, 416/5, 416/6, 419/19, 419/20, 420/1, 421/8,
 421/16, 421/19, 436/2, 436/5, 440/20, 440/23, 441/1,
 441/12, 471/1, 471/5, 471/6, 492/7, 492/8, 492/11,
 492/13, 492/15, 492/17, 492/19, 492/24, 492/25, 493/2,
 493/4, 493/23, 493/24, 494/19, 496/12, 498/5, 499/10,
 499/12, 506/3
 LEO 392/11, 402/23
 LEON 367/14, 514/2
 letter 425/4, 430/11, 435/21
 level 371/5, 372/17, 434/9, 444/13, 444/16, 444/21,
 452/16, 454/17, 457/25, 458/16, 478/1, 486/2, 502/15
 life 468/21, 469/2, 473/16
 limit 426/11
 limitation 401/22
 limits 506/7, 508/12
 line 377/25, 381/18, 382/18, 383/2, 383/21, 397/15,
 406/1, 406/2, 406/3, 414/19, 414/25, 460/7, 462/2, 474/2
 lines 383/1, 401/25, 402/1, 405/22, 405/25, 406/12,
 412/7, 414/18, 416/11, 416/14, 417/13, 455/5, 459/13,
 499/4, 509/18
 links 448/2
 list 369/10, 375/25, 387/8, 388/7, 406/13, 406/14,
 407/10, 426/21, 454/18
 listed 394/8, 394/9, 394/23
 listing 376/11, 394/2, 394/8, 405/7, 405/8, 407/7,
 407/8
 listings 426/21
 lists 396/10
 literally 392/11, 511/6
 little 380/16, 382/9, 386/6, 386/17, 387/1, 387/16,
 387/20, 390/19, 394/22, 397/23, 410/25, 415/10,
 418/15, 424/9, 424/13, 424/17, 433/9, 433/18, 442/3,

450/2, 461/17, 461/21, 474/5, 479/1, 501/25, 505/18,
 512/25
 live 438/5, 454/10, 458/20
 living 490/5
 LNP 459/3, 511/22, 512/3, 512/11
 LOA 425/3, 495/17
 load 483/20, 485/1
 local 378/23, 406/22, 423/11, 423/25, 424/11, 424/12,
 430/7, 442/21, 443/22, 444/25, 455/20, 458/2, 462/22,
 473/12, 481/8, 492/1, 493/6, 493/13, 495/22, 496/9,
 503/12
 locally 499/8, 499/9
 located 433/24, 436/11
 location 406/2
 lock 447/20
 log 374/12, 412/11, 414/11, 425/20
 log-on 390/11
 logging 371/18
 logical 395/5
 logo 502/25, 503/2
 loop/port 509/14
 loops 449/14, 449/16, 449/23
 lost 391/11, 463/2, 491/21, 505/17
 Louisiana 434/1, 440/1, 462/10
 love 381/18
 lower 391/21, 472/2, 486/6, 502/18
 LPIC 386/22, 387/8, 387/9, 387/11, 405/10, 407/5
 LSR 473/13, 501/14
 LSRs 436/4
 luck 413/8, 426/13
 lumped 435/13, 488/2

M

mail 388/21, 503/14
 main 492/18, 495/21, 502/13
 maintain 370/15, 464/1, 479/20
 maintenance 454/23, 468/24, 469/7, 471/16, 471/17,
 471/19, 473/22, 477/24
 major 440/25, 441/12, 471/25, 477/12, 505/20
 majority 499/9, 499/24
 manage 374/5
 management 425/13, 463/23, 469/12, 475/17,
 498/14, 512/7
 manager 461/12, 461/14, 468/17, 478/12, 486/18,
 487/1, 487/2, 487/3, 487/9, 488/21, 492/23, 503/4
 managers 413/10, 413/12, 465/3, 498/16
 manner 449/8, 501/15, 513/13
 manual 402/12, 417/3
 manually 386/24, 404/3, 404/7, 408/11, 413/3, 414/3,
 414/23, 414/24, 414/25, 416/4, 416/9, 417/19, 419/2,
 419/6
 manuals 392/9
 map 437/16
 mapping 481/6
 maps 426/18, 426/19
 March 380/2, 423/19, 511/23
 market 370/15, 370/16, 424/18, 442/17, 442/20,
 442/21, 442/23, 443/24, 445/17, 445/23, 445/24,
 447/10, 447/14, 452/8, 453/6, 453/14, 463/1, 463/3,
 463/5, 472/7, 472/9, 476/5, 480/13, 482/9, 484/25,
 486/13, 496/5, 500/9
 marketing 507/1, 507/2, 507/16, 507/22, 507/23,
 508/12
 marketplace 462/19, 462/23, 469/9, 469/17, 471/22,
 500/21
 markets 463/7
 Maryland 484/16
 mass 447/14, 472/7
 massive 433/14
 master 388/7, 465/16, 466/19, 466/22, 467/10,
 467/12, 467/22, 468/5, 468/9, 469/19, 470/2, 474/19,
 479/6, 480/1, 480/19, 481/21, 485/7, 486/14, 488/14,
 488/18
 match 484/1
 matrix 470/3
 Matter 367/4, 392/23, 432/5, 451/23, 467/17, 468/7,
 468/8, 493/12, 501/10
 mature 443/22, 443/25
 McGuffie 423/14, 424/21, 433/21, 433/23
 MCI 404/5, 438/25, 440/11, 446/7, 493/10, 497/8,
 509/10, 511/17, 511/21, 511/23, 512/4, 512/10, 512/18
 MCI's 459/24
 measurement 466/11, 490/7
 measures 456/11
 measuring 470/8
 mechanisms 463/8
 media 478/7
 meet 439/8, 491/6, 497/2
 meeting 487/19, 488/24
 meetings 477/11
 meets 457/21, 488/7
 member 494/12

members 423/19, 424/2, 494/23
 membership 423/23, 443/6
 memory 388/24, 388/25, 389/2, 406/5
 mention 508/21, 509/4
 mentioned 374/8, 401/22, 415/19, 418/10, 499/21,
 512/8
 mercy 378/18
 merit 505/14
 message 390/25, 434/16
 met 491/5, 491/8, 491/10, 496/4, 501/20
 Method 408/5, 439/25, 508/1
 methodology 457/20, 485/16
 methods 471/10
 metrics 467/5
 metric 464/8
 metrics 467/6, 471/14
 MIA 393/12
 Miami 369/18, 378/5, 378/19, 378/21, 382/5, 383/17,
 393/13, 491/22, 491/23
 microphone 423/5, 484/18, 504/8
 mid-August 479/12
 middle 374/13
 migrate 473/20
 migrating 473/8
 migration 473/4
 military-type 474/11, 474/15, 476/21
 million 444/24, 487/23, 487/24, 488/2
 mimic 452/3
 mimicking 455/1
 mind 383/12
 minds 487/19
 minimum 378/7
 Minnig 461/10
 minute 376/15, 416/5, 485/2
 minutes 369/8, 377/8, 384/16, 399/2, 399/12, 399/13,
 399/20, 408/17, 408/25, 409/1, 409/4, 409/7, 416/8,
 448/18, 495/2, 499/17, 501/17, 501/18, 503/12
 mirror 484/25
 MISCELLANEOUS 368/2
 misinterpreted 475/7
 misplaced 496/18
 miss 491/13
 missed 438/7
 Mississippi 433/25, 434/1
 mistake 393/1, 435/4, 500/6, 500/7
 mistakes 382/17, 392/24, 392/25, 409/19, 432/3, 512/2
 mitigates 483/13
 mix 465/18, 470/6, 482/8, 484/23
 mixture 460/19
 mode 378/11, 380/1
 model 458/15
 Modeling 448/7
 modifications 506/14
 modify 396/2
 moment 511/8
 money 378/14, 417/11, 438/18, 439/3, 440/6
 monitored 490/12
 Monitoring 477/17, 483/21
 month 390/3, 390/4, 413/6, 466/4, 469/5, 478/17,
 478/23, 493/20, 494/1, 503/13
 monthly 473/25
 months 380/3, 400/5, 413/5, 429/24, 430/3, 431/13,
 431/15, 437/4, 469/19, 469/24, 479/24, 480/5, 499/10,
 501/2, 511/7
 months? 379/21
 morning 371/25, 374/8, 392/20, 461/16, 499/21,
 502/21
 moron 395/15
 motherhood 370/24
 mouth 439/1
 move 406/23, 418/2, 424/25, 427/18, 444/4, 456/17
 moved 494/3
 moving 406/1, 406/24, 413/20, 428/18
 Mr. Customer 391/14
 MR. DELATOUR 368/12, 491/20
 MR. FELZ 421/10, 421/16, 421/21
 MR. GILLAN 368/9, 442/1, 446/12, 446/13, 446/21,
 448/24, 451/1, 451/19, 456/20, 457/15, 457/23, 461/7,
 505/13, 509/19
 Mr. Green 512/8
 Mr. Jeff 423/12
 MR. KLEIN 368/14, 500/18, 502/4
 MR. MCGUFFIE 368/8, 433/22, 438/1, 439/11,
 439/14, 440/23, 441/23
 MR. MINNIG 368/11, 461/10, 466/8, 466/17,
 466/21, 467/20, 468/12, 471/8, 472/4, 472/21, 478/24,
 480/7, 481/5, 484/7, 486/11, 487/7, 487/14, 487/21,
 488/8, 488/12, 488/17, 489/17, 490/10, 490/19, 491/16,
 505/13, 506/9
 MR. RODERICK 368/6, 424/4, 424/5, 429/17
 Mr. Stacy 504/13, 505/5, 505/12, 506/20, 508/7,
 508/10, 509/2, 509/4, 510/1, 510/5, 510/9, 510/23,
 511/4, 511/11, 511/15, 512/21

MS. BENTLEY 369/15, 372/24, 373/7, 373/12,
 373/20, 374/20, 375/9, 375/12, 375/19, 375/23, 375/25,
 376/24, 377/4, 377/6, 380/10, 380/16, 381/3, 381/13,
 385/8, 385/14, 385/17, 386/4, 386/16, 386/20, 387/5,
 387/11, 387/14, 388/8, 388/12, 388/15, 388/18, 392/4,
 392/7, 392/11, 394/7, 394/14, 394/16, 395/23, 397/11,
 397/15, 398/6, 398/17, 398/19, 401/4, 401/7, 401/10,
 401/14, 401/18, 401/21, 402/4, 402/11, 402/14
 MS. KRATING 418/9, 504/2, 505/2, 512/23, 513/6
 MS. LEO 410/9, 410/17, 411/4, 419/23, 420/2
 MS. SUMMERLIN 423/2
 MS. WELCH 368/5, 402/21, 409/9, 410/7, 411/8,
 418/13, 419/15, 419/20, 420/8, 420/11, 420/16, 421/2,
 421/7, 421/23, 422/4, 422/10
 Mullin 501/24
 multiple 375/2, 376/24, 383/10, 393/22, 422/9, 483/22
 municipalities 426/16, 427/14, 436/14
 municipality's 426/6

N

NA 437/5, 437/8
 name 377/15, 382/3, 391/13, 391/15, 391/19, 395/4,
 395/9, 395/13, 402/21, 424/6, 425/6, 433/22, 434/20,
 434/21, 460/14, 461/10, 500/19
 nation 458/2
 National 428/1, 428/6, 443/1
 nature 430/7, 479/4
 NEAC 427/25, 428/11, 429/9, 429/17, 429/22
 necessary 443/25, 456/5
 need 369/10, 373/1, 373/7, 377/19, 393/15, 394/18,
 395/25, 398/7, 400/8, 402/16, 410/13, 425/25, 427/16,
 430/14, 430/16, 438/22, 442/20, 443/16, 446/9, 448/4,
 449/21, 452/21, 453/19, 453/23, 453/24, 454/12,
 454/15, 455/13, 455/17, 458/6, 458/25, 459/16, 477/25,
 478/1, 479/15, 483/4, 499/19, 505/18
 needed 397/4, 449/15, 453/19, 474/20
 needs 391/20, 396/6, 399/21, 442/17, 455/3, 455/22,
 457/1, 475/2, 476/14, 488/24, 488/25, 493/11, 493/14,
 501/11
 negative 434/8
 negotiate 371/15, 397/24
 negotiated 447/5
 negotiating 434/4
 negotiation 376/1
 neighboring 483/2
 network 445/13, 446/20, 447/3, 447/24, 449/24,
 450/1, 454/8, 454/9, 455/10, 455/14, 456/1, 459/3,
 499/8, 506/4, 512/7
 new 370/6, 376/14, 381/21, 381/24, 386/2, 405/5,
 405/25, 406/2, 406/4, 406/15, 406/17, 406/24, 412/12,
 423/18, 424/24, 427/18, 431/9, 431/12, 431/17, 431/20,
 432/9, 440/14, 442/17, 446/9, 446/25, 448/3, 453/9,
 453/16, 457/13, 457/14, 457/24, 457/25, 458/4, 458/7,
 459/5, 460/14, 460/22, 461/13, 461/18, 461/24, 464/14,
 466/1, 466/2, 466/23, 469/18, 469/22, 471/10, 472/12,
 472/14, 472/21, 472/25, 474/7, 474/23, 475/15, 477/10,
 478/8, 478/16, 478/22, 479/2, 479/8, 479/11, 479/12,
 480/7, 480/11, 480/18, 481/14, 481/23, 482/2, 482/3,
 482/4, 484/10, 484/13, 484/18, 484/21, 486/9, 486/12,
 486/22, 486/25, 487/16, 487/23, 487/25, 500/23, 501/7,
 502/5, 502/9, 502/12, 507/21, 507/25
 newspaper 502/22
 nice 378/18
 night 409/20
 Nine 414/4
 ninth 414/19
 nit-picky 386/6
 nominal 416/19
 nondiscriminatory 442/13
 nonpay 415/24
 nonrecurring 474/1
 normal 443/13
 normally 496/23
 north 382/1, 382/6
 notes 392/15, 514/9
 notice 412/13, 415/22, 425/23, 429/3
 notification 374/1, 385/24, 432/25, 433/8, 435/17,
 437/11
 notified 385/22
 notify 435/20, 435/24, 438/13
 notifying 435/22
 November 510/15
 move 445/23, 458/11
 number 383/25, 384/15, 384/17, 384/19, 384/21,
 384/24, 385/6, 385/9, 386/2, 386/6, 389/18, 390/18,
 390/19, 391/23, 393/8, 393/9, 396/23, 398/20, 399/22,
 404/17, 405/10, 406/2, 407/7, 408/15, 408/18, 411/23,
 428/21, 429/1, 432/9, 437/25, 438/2, 438/4, 441/11,
 456/25, 473/9, 473/19, 479/7, 481/15, 490/25, 493/19,
 494/25, 495/2, 499/16
 numbers 384/2, 384/4, 384/5, 384/6, 384/7, 384/8,
 384/11, 384/13, 414/14, 415/4, 428/24, 454/11

NYNEX 481/24

O

obligated 446/24
 obligation 447/5
 obtain 445/6
 obtained 455/20
 occasions 403/25
 occurring 381/12, 472/23
 October 430/4, 510/15
 oddity 382/9, 390/19
 off-line 370/4
 offending 505/12
 offer 444/5, 447/3, 464/21, 470/4, 506/25, 509/6,
 509/10, 509/12
 offered 465/18, 470/4, 471/1
 offering 401/2
 offers 439/20
 office 378/5, 378/14, 381/5, 440/8
 officer 433/23
 officials 478/7
 old 481/24
 on-line 371/22, 372/2
 open 432/3, 452/11, 463/15, 486/9, 486/12, 496/2,
 498/10, 500/9, 503/24, 506/14, 512/24
 opened 497/21
 opening 496/5
 openness 462/22
 operate 436/13
 operating 418/10, 444/2, 451/13, 452/23
 operation 401/17, 406/9, 424/14
 operational 367/5, 440/17, 442/13, 443/15, 464/4,
 479/17
 operations 369/18, 416/1, 416/7, 463/18, 469/10,
 485/17
 opinion 372/1, 457/18, 457/20, 506/13
 opportunities 498/4
 opportunity 384/1, 442/15, 504/3, 504/10, 513/8
 opposed 421/9, 490/4, 490/13
 option 393/4, 438/9, 438/11, 506/19, 506/20
 order 370/6, 371/17, 371/18, 371/19, 372/5, 372/10,
 372/12, 372/25, 373/2, 373/4, 374/2, 374/13, 374/17,
 374/21, 375/1, 376/4, 376/7, 376/9, 376/11, 376/13,
 376/20, 376/21, 377/13, 381/21, 381/23, 384/18, 385/3,
 385/18, 385/19, 388/3, 388/24, 390/1, 391/22, 393/5,
 393/19, 393/21, 393/24, 394/4, 394/10, 397/13, 397/17,
 397/21, 397/21, 399/1, 399/2, 399/14, 399/19, 401/24,
 402/1, 402/3, 402/9, 402/24, 405/11, 405/12, 406/24,
 407/2, 407/24, 408/3, 408/10, 408/14, 408/15, 408/23,
 409/14, 409/24, 410/3, 410/19, 411/14, 411/19, 411/20,
 411/25, 412/3, 412/9, 412/11, 412/12, 412/17, 412/19,
 413/2, 414/6, 415/1, 415/9, 416/1, 416/2, 416/21,
 416/23, 417/5, 417/8, 417/9, 420/3, 424/19, 425/16,
 425/19, 428/5, 428/19, 428/20, 428/24, 429/6, 430/11,
 430/12, 430/25, 431/9, 431/25, 432/8, 440/22, 444/23,
 445/6, 445/16, 447/10, 448/9, 449/19, 454/12, 454/15,
 463/24, 466/13, 468/17, 468/19, 468/23, 473/1, 473/10,
 473/20, 491/3, 492/24, 492/25, 493/3, 493/5, 493/8,
 493/21, 494/8, 494/11, 497/1, 497/6, 497/9, 497/10,
 509/22, 509/25, 510/2, 510/10, 510/11
 ordered 512/13
 ordering 388/24, 393/18, 403/15, 404/24, 428/3,
 511/3, 511/4
 orders 371/25, 372/10, 372/13, 374/16, 375/3,
 392/18, 399/11, 399/23, 401/23, 402/11, 403/16, 404/3,
 404/7, 406/6, 406/7, 406/10, 406/11, 408/1, 408/6,
 408/19, 411/13, 411/16, 412/6, 412/21, 413/14, 413/19,
 414/1, 414/4, 414/9, 414/12, 417/16, 417/19, 419/1,
 419/4, 419/16, 424/16, 424/25, 425/12, 429/7, 430/6,
 430/7, 431/1, 431/3, 432/12, 433/13, 436/6, 441/8,
 444/23, 445/2, 448/10, 449/5, 449/6, 449/20, 449/24,
 453/8, 453/11, 453/13, 453/24, 458/14, 459/25, 467/3,
 467/9, 470/16, 471/11, 501/13, 511/18, 511/22, 511/23,
 512/3, 512/6, 512/12
 Ordozi 391/20
 organization 413/11
 oriented 370/9, 444/15
 original 475/4, 481/25
 OSS 370/13, 370/19, 370/20, 372/23, 372/25, 374/4,
 399/23, 400/6, 404/8, 407/1, 413/9, 416/25, 417/15,
 419/8, 424/1, 442/5, 443/25, 445/5, 445/11, 445/18,
 447/8, 447/17, 449/4, 449/22, 450/6, 456/17, 457/2,
 464/3, 464/5, 476/19, 482/15, 485/13, 490/8, 504/24,
 510/7, 510/9, 510/21, 511/7, 514/5
 outages 455/2
 outputted 429/21
 outstanding 373/23
 overcome 450/20, 450/25
 overdraft 496/11
 overestimate 397/6
 overlap 373/6, 373/11, 373/19, 375/8, 375/18,
 375/22, 376/23

overnight 450/3
oversight 483/15
overtime 416/18
overview 461/23, 462/4
owed 415/21
owner 424/10, 426/2, 464/25
owns 465/4, 477/15, 488/5

P

p.m 367/16, 369/2, 438/10, 513/17
P.O 389/18
Pacific 460/9
Packard 480/25, 481/3, 481/5
Pages 367/8, 387/18, 387/19, 387/24, 389/7, 395/7,
436/4, 436/25, 514/9
paid 417/6, 417/8, 438/18, 439/3, 440/6, 457/13,
457/16, 495/19
painful 379/22, 380/6
pair 473/21
Palm 382/5
paper 416/10, 416/13, 416/15, 416/24, 442/25
paperwork 416/18, 492/8, 493/24, 497/6
par 370/19, 399/23, 399/25
parallel 476/10, 480/12, 481/1
parameters 407/23, 409/11
Pardon 392/4
parentheses 391/25
Parity 414/5, 414/8, 415/4
part 372/25, 373/3, 374/2, 383/25, 384/4, 388/15,
404/2, 405/20, 418/19, 441/19, 454/16, 454/24, 455/4,
459/10, 479/18, 481/24, 488/2, 489/20
participants 491/12
participated 513/8
participates 482/15
participating 454/2, 468/1, 478/9
participation 513/14
parties 451/15, 452/24, 456/25, 465/5, 467/24,
479/10, 480/24, 488/21, 503/25, 506/12
party 444/9, 445/23, 446/3, 450/12, 450/17, 451/2,
451/6, 451/10, 452/17, 452/20, 452/22, 453/2, 453/16,
453/20, 454/5, 454/20, 455/16, 456/19, 456/21, 456/25,
457/8, 458/10, 459/17, 460/12, 460/17, 460/20, 465/2,
480/22, 487/11, 505/25
pass 456/9, 490/23
passed 449/11, 450/9
password 390/11, 406/5
Pause 380/25, 383/16, 414/16, 491/17
pay 415/23, 426/3, 427/14, 430/15, 441/6, 495/9, 499/9
payphone 406/6, 406/9, 415/20, 417/12
Pembroke 393/13
penetrate 442/20, 442/22
Pennsylvania 461/15, 467/23, 472/12, 472/13,
472/19, 477/11, 479/3, 480/24, 481/21, 481/22, 481/24,
482/2, 482/4, 484/9, 484/18, 484/20, 486/9, 486/19,
486/23, 486/24, 487/6, 487/15, 487/22, 489/25
perceiving 450/21
percentage 439/9
performance 399/16, 403/12, 439/10, 456/11, 464/6,
464/7, 464/8, 466/24
Performed 408/2
performing 405/19, 406/15, 461/14
perimeters 466/13
period 447/4, 453/5, 466/14, 469/5, 476/6, 478/15
periods 445/3
permit 463/25, 464/21
permitted 464/15
personal 435/3, 494/23, 498/13
perspective 403/5, 424/7, 461/20, 483/21
Peter 491/18, 502/14
phase 465/15, 465/22, 465/24, 466/6, 467/16, 486/14,
486/15, 486/17, 489/21, 489/22
Phone 368/7, 377/14, 383/14, 383/23, 393/8, 393/9,
393/24, 405/10, 406/2, 407/7, 408/24, 408/25, 410/11,
412/18, 412/23, 416/17, 423/14, 424/11, 424/12, 425/9,
428/15, 428/21, 430/8, 436/12, 432/9, 437/20, 437/22
phonetic 501/25
phrases 465/15
phrasing 445/16
physical 454/6
PIC 387/8, 387/11, 405/10, 405/24, 407/4, 508/23
pick 384/13, 384/20, 388/1, 396/12
picking 397/25
pie 370/23
piece 480/11, 492/5
pieces 416/10, 416/13, 416/15, 416/24, 511/15
Pines 393/14
pipe 378/19, 378/20
PLACE 367/17, 376/21, 382/4, 392/16, 417/6,
420/22, 427/10, 427/23, 428/23, 429/7, 432/21, 445/4,
446/15, 464/14, 469/13, 491/1, 497/6, 508/19, 514/6
placebo 389/22
placed 374/17, 452/6

places 392/17, 409/21
plan 460/15, 460/18, 460/20, 465/13, 465/16, 466/19,
466/22, 467/10, 467/13, 467/22, 468/5, 468/9, 469/19,
478/2, 472/16, 472/17, 474/19, 476/6, 479/7, 480/1,
480/12, 480/20, 481/21, 485/8, 486/15, 488/3, 488/15,
488/18, 489/3, 505/2
planned 369/21, 369/22
plans 460/11, 489/21
platforms 447/14, 448/2, 463/8, 489/12, 499/3,
508/23, 509/7, 509/14, 509/24, 510/22
play 441/19
players 464/23
playing 434/10, 441/17, 447/11, 486/2, 502/15
plowed 369/12
plns 408/18, 409/4, 409/23, 416/20
FMBK 393/14
FNS
point 374/15, 395/1, 395/14, 399/8, 400/4, 401/5,
409/18, 413/5, 414/10, 415/13, 417/18, 419/2, 419/4,
423/17, 423/20, 441/4, 449/18, 457/25, 458/14, 458/18,
460/23, 466/4, 478/11, 485/2, 493/9, 502/15
pointed 434/12
pointing 512/16
points 388/22, 392/16, 452/6, 452/7, 470/12
policy 431/14, 431/22, 432/5, 432/19, 432/22, 477/25
poor 434/14, 436/19
pop 492/13
popped 492/17
populate 377/12
Populations 377/25
portion 371/14, 505/25
ports 454/5, 458/19
position 372/22
positive 436/2
positives 433/19
possibility 404/8, 513/6
possible 381/10, 381/19, 419/1, 452/2, 476/7
posted 474/23
POTAMI 367/20, 514/3
potential 392/17
precalculates 371/16
prefiling 466/24, 476/14
premise 438/9
premises 433/3
preorder 425/21, 425/25, 430/13, 468/22, 473/17,
496/23, 509/25
preordering 403/13, 404/15, 404/20, 404/23, 505/21
preorders 468/22, 473/20
prepaid 423/22, 423/23, 424/11, 424/12, 430/7,
433/25, 499/3
preparation 465/25
prepare 459/15, 474/22
prepared 415/23, 442/25, 459/19, 466/1
PRESENTATION 368/5, 368/6, 368/8, 368/9,
368/11, 368/12, 368/14, 369/9, 397/22, 402/16, 402/17,
403/4, 403/18, 407/14, 410/1, 413/25, 424/19, 442/3,
442/24, 444/13, 461/19, 463/10, 486/22, 504/14, 505/6
presentations 382/22, 407/18, 423/16
presented 376/2, 513/3
presenter 369/5, 369/9
presenters 423/3, 423/12, 423/21
presenting 424/3
president 501/1
pretest 452/23
pretty 386/12, 386/22, 404/22, 407/10, 419/7, 430/10,
432/13, 444/17, 449/21, 484/1, 484/12, 491/23, 499/19,
500/20, 501/7, 501/19, 501/21
price 509/11, 509/12, 510/22, 511/8
priced 510/3
prices 486/6, 502/16
pricing 509/14
primary 402/25
principle 444/19, 445/4, 451/20
principles 444/12, 444/16, 457/22
print 371/20, 392/14, 430/12
printed 425/17, 425/19
printer 429/22, 429/25, 430/3
prints 381/19
priority 470/9
problem 371/24, 374/23, 384/3, 397/5, 398/4, 409/22,
417/14, 427/1, 429/20, 429/23, 430/1, 430/3, 434/17,
436/16, 437/22, 438/5, 441/1, 470/19, 474/20, 492/20,
493/11, 493/13, 494/4, 494/18, 500/17, 510/8
problems 370/2, 374/7, 377/7, 377/10, 384/12,
427/20, 429/18, 429/25, 430/5, 432/14, 434/23, 435/15,
439/14, 440/8, 440/10, 441/12, 455/3, 456/8, 459/22,
464/17, 474/13, 493/18
procedural 437/11, 461/23, 468/13, 469/6
procedure 432/19, 436/19, 436/20, 437/10, 506/23
procedures 475/17, 497/7
proceed 402/15, 441/24
proceeded 442/4
proceeding 449/25, 450/1, 467/16, 467/21

PROCEEDINGS 367/10, 380/25, 491/17, 514/8,
514/9
process 373/2, 374/6, 374/11, 375/2, 399/1, 399/19,
399/22, 401/23, 402/3, 402/4, 403/15, 406/10, 406/11,
408/9, 410/2, 411/10, 413/19, 419/16, 424/24, 425/25,
429/20, 430/10, 432/2, 432/7, 432/13, 436/9, 440/22,
442/8, 444/7, 446/4, 446/8, 446/19, 449/7, 449/13,
450/10, 450/13, 450/16, 451/5, 451/11, 452/18, 452/24,
453/5, 453/8, 453/17, 454/2, 454/7, 454/14, 454/24,
455/4, 456/17, 457/2, 457/8, 458/13, 458/24, 459/1,
460/8, 462/8, 462/12, 464/8, 464/14, 465/13, 465/22,
467/23, 468/1, 468/16, 473/24, 474/6, 474/16, 476/11,
476/25, 477/16, 478/3, 478/13, 478/18, 482/7, 485/23,
486/10, 486/13, 486/19, 487/14, 497/4, 504/25, 505/8,
505/9, 508/17, 509/25, 513/11
processed 370/6, 372/14, 406/7, 408/10, 414/3,
414/22, 414/24, 414/25, 419/6, 424/16, 425/13, 445/2,
454/11, 492/25, 500/5, 510/16
processes 425/1, 449/20, 462/17, 469/7, 469/10,
469/13, 478/20, 485/5
processing 372/25, 373/4, 374/2, 374/13, 405/17,
407/10, 410/18, 413/18, 415/8, 417/9, 428/3, 431/3
produce 411/14, 450/7
producing 429/5
product 376/11, 381/5, 387/15, 404/14, 405/3,
421/25, 422/3, 469/22, 470/3, 486/5
products 376/2, 376/3, 376/6, 376/10, 387/19,
387/24, 396/9, 465/18, 469/21, 470/21, 482/8, 484/24,
500/8
professional 501/9
program 492/11
programs 498/1
progress 477/17
progression 468/20
project 492/23, 512/6
projects 483/16
proposal 505/11, 507/21
proposed 417/2
proposition 507/25
proprietary 396/2
proud 446/4
prove 494/23, 505/19
provide 370/18, 370/20, 372/19, 388/6, 422/2, 434/5,
447/9, 447/16, 455/16, 481/8, 483/5, 484/22, 485/25,
490/24, 491/25, 492/6, 493/16, 495/6, 495/23, 495/24,
498/25, 509/7, 510/10
provider 420/6, 433/25, 509/8
providers 370/14, 423/22, 509/8, 509/15
provides 370/21, 372/16, 446/1, 462/24, 463/1, 468/9
provision 510/17
provisioned 418/19, 456/2
provisioning 402/24, 469/10, 473/21, 477/24
provisions 443/19
pseudo-CLEC 453/10, 454/13, 455/16, 458/10,
480/18
PUBLIC 367/1, 457/1, 464/24, 465/1, 465/2, 466/3,
467/1, 474/23, 500/10, 505/22, 514/5
publications 370/8
PUC/PSC 483/13
pull 375/7, 375/17, 375/21, 415/2
pulled 404/9, 416/16
purchase 378/4, 455/24, 503/16
purchased 456/2
pure 422/15
pursuing 378/1, 379/24
push 389/13, 400/24, 459/25
pushed 416/4, 459/8
put 371/25, 384/13, 395/20, 403/4, 409/1, 437/8,
444/5, 456/23, 457/6, 464/14, 486/13, 488/19, 488/23,
492/24, 501/17, 509/23, 510/12
puts 417/16
putting 428/19, 473/13, 501/13, 512/5

Q

quality 370/21, 469/7
question 373/18, 386/14, 401/12, 409/5, 418/9,
422/12, 440/19, 447/16, 451/20, 452/13, 456/20, 457/5,
462/1, 463/11, 477/5, 480/4, 486/21, 496/6, 502/13,
505/4, 509/18, 510/6, 511/7, 511/8
questionable 383/8
questioning 399/8
questions 406/25, 401/9, 403/1, 408/22, 413/9, 418/8,
441/21, 461/5, 503/22, 503/25, 504/4, 504/6, 504/12,
504/13, 504/18, 504/20, 512/24, 513/1, 513/3
quick 432/12, 478/4
quicker 410/25, 420/2, 433/16, 433/17, 433/18
quote 379/20, 380/19, 381/4
quotes 411/23

R

R-O-A-D 441/16
 raised 474/20, 498/6
 ran 501/1
 range 442/15, 451/9
 ranging 443/2, 475/16
 rate 466/15, 466/16, 471/6, 502/23, 503/5
 rating 372/17
 RBOC 445/6, 462/22, 463/2, 463/9, 463/24, 464/21, 470/4, 470/8, 476/15
 RBOC's 463/18, 482/14, 482/21, 483/4, 483/10, 484/23, 485/17
 RBOCs 476/13, 485/14, 485/16
 RD 441/16
 react 505/10, 506/18
 read 502/22
 readiness 464/4, 480/14, 484/23, 485/25, 490/8, 490/12
 reality 416/11, 444/14, 453/4
 realm 422/2
 realtime 385/7, 451/4
 reason 376/9, 378/1, 419/7, 429/11, 450/6, 452/18, 458/8, 480/3, 488/16, 496/21
 reasons 413/16, 443/9, 446/25, 450/11, 451/16, 479/8, 480/13, 481/15
 recall 435/4, 471/25
 receipt 473/10
 receive 425/3, 428/20
 received 507/20
 recess 402/19, 422/23
 reciprocal 455/24
 recommendation 400/23
 reconcile 410/1, 435/8
 reconciled 435/9
 reconnect 416/14
 reconvene 369/3, 422/25
 reconvened 369/2
 record 371/6, 371/8, 404/18, 473/18
 records 455/22
 recover 448/21, 449/3
 recurring 473/25
 red 392/15
 reduces 382/23
 redundant 506/1
 recentering 383/7
 refinement 450/17, 480/12
 reflected 385/8, 465/12
 reflects 485/1
 refresh 386/18, 396/22
 refund 438/19
 refusing 447/18
 refute 475/5
 refuted 475/13
 region 420/14, 465/10, 465/17, 465/19, 465/21, 472/17, 482/21, 482/23, 483/8, 484/2, 484/14
 regional 462/5, 482/12, 482/13, 482/20, 483/9, 483/12, 483/24, 484/6, 484/8, 484/11, 484/22, 485/1, 485/8
 regionally 482/17
 regular 435/1, 492/4
 regulatory 478/7
 reinvent 400/9
 reject 385/24, 390/1, 391/1, 391/21, 391/22, 397/14, 398/22
 rejected 371/25, 385/17, 385/18, 385/20, 392/18, 394/25, 431/19, 431/20, 493/1, 497/9, 497/11, 497/13
 rejection 376/9, 392/19, 449/7
 rejections 432/4
 rejects 372/5, 384/18, 388/3, 393/5, 432/21, 433/16
 related 389/1, 406/6, 413/9, 446/15, 462/14
 relation 425/12
 relationship 401/3, 443/13, 463/22, 464/2
 release 406/17
 relief 463/4
 relies 469/14
 relying 455/21
 remainder 452/25
 remand 449/25
 remechanism 473/6
 remember 384/21, 390/21, 397/10, 397/23, 506/22, 506/23
 remove 428/12
 rep 376/5, 425/8, 425/15, 425/19
 repair 375/16, 429/10, 432/24, 432/25, 454/23, 455/3, 467/3, 468/24, 471/17, 471/19, 473/22, 477/24
 repeat 387/3
 repeatable 485/15
 replow 369/11
 report 465/25, 466/2, 466/5, 469/4, 474/22, 475/5, 477/3, 478/12, 501/19
 REPORTED 367/20, 393/6, 454/11, 514/7
 Reporters 367/21, 368/15, 514/1, 514/4

reporting 425/14, 474/16
 reports 429/25, 462/14
 represent 482/22, 499/24
 representative 483/19, 493/7, 494/10, 498/14, 498/20
 representative's 511/21
 representatives 437/17, 499/22
 represented 470/22
 representing 483/18
 reps 488/24, 416/16, 434/14, 434/20
 request 369/12, 375/16, 426/8, 473/12, 479/19, 481/8, 508/8
 requested 389/20
 require 402/12, 457/11
 required 370/18, 370/20, 373/8, 380/5, 462/3, 464/1
 requirement 372/21, 372/23
 requirements 390/3, 455/9, 476/6, 483/13
 requires 435/23, 435/24, 483/24
 resale 377/1, 388/2, 403/6, 434/3, 435/23, 447/24, 455/15, 463/8, 473/5, 489/11, 506/5, 510/3
 reseller 403/5, 403/7, 403/23, 417/11, 417/17, 418/3, 418/23, 422/14, 422/18, 500/21, 500/23, 503/16
 resellers 421/4
 reselling 423/24
 reservation 473/19
 reserve 404/17
 reserved 385/10, 386/6
 residence 507/5, 507/10, 507/15, 507/24, 508/13
 Residential 381/24, 399/1, 399/11, 412/7, 414/18, 422/16
 resolution 457/11, 478/5
 resolve 428/15, 433/2, 477/4, 477/14, 487/6, 512/10
 resolved 374/23, 432/25, 434/18, 478/1, 479/16, 493/14, 494/4, 511/14, 512/11
 resources 398/1, 451/3, 453/19, 453/23, 458/18, 459/12, 459/17, 462/2, 477/6, 477/7, 483/14
 respect 504/24
 respond 378/11, 467/2, 475/4, 504/3, 504/5, 504/11, 504/15
 response 383/5, 401/9, 461/5, 466/15, 468/18, 470/18, 471/5, 496/24, 503/23, 507/13, 513/3
 responses 426/18, 426/23, 481/12, 481/13
 responsibilities 477/10
 responsibility 374/5, 426/3
 responsive 378/2
 rest 448/19
 restoration 454/23, 455/3
 restores 405/7
 restructure 442/12
 resubmit 412/11, 413/4, 415/1
 resubmitted 412/12, 497/17
 result 478/4
 results 450/3, 450/7, 456/10, 458/24, 465/24, 467/12, 467/13, 474/8, 477/4, 485/3, 488/16, 490/2, 490/7, 490/21, 497/24
 retail 414/8, 467/5, 467/6, 500/25
 retain 395/21
 retest 456/9, 475/12, 475/21
 retrieval 473/18
 revenue 429/5
 reverse 403/17
 review 462/17, 477/21
 rewritten 507/4
 RFP 486/10, 486/13, 486/19
 rhythm 404/7
 riddled 393/11
 risk 505/12
 RNS 372/16, 376/4, 382/18, 382/20, 383/7, 384/7, 388/24, 393/21, 394/13, 394/16, 395/2, 395/8, 395/10, 397/23, 399/2, 399/6, 400/8, 400/24, 421/1, 421/9, 421/15, 421/19, 506/14, 506/25, 507/12, 507/21
 road 441/15
 Roederick 423/12, 424/6
 robustness 456/7
 role 461/13, 461/14, 483/14, 508/25
 roles 477/9
 roll 460/22
 Room 367/18, 406/22
 round 449/25
 routed 413/10
 RPR 367/20, 367/21, 514/3, 514/4
 rules 481/7, 482/2, 482/18
 run 436/11
 running 369/7, 403/12, 417/25, 493/25, 494/21
 runs 459/18
 rural 437/13, 437/23, 438/6
 RUTHE 367/20, 514/3

S

safeguards 506/16
 said/she 451/9
 sales 436/12, 507/1, 507/2, 507/16, 507/22, 507/23, 508/11

sampling 416/6
 satisfactory 450/7, 478/4
 satisfied 474/13
 save 504/16
 saw 382/20, 395/2, 397/22, 502/22
 scalability 464/6, 464/9
 scale 445/1
 scarce 451/3
 scenario 455/8, 473/3
 scenarios 454/24, 469/15, 472/25, 473/1, 473/2, 474/18
 scene 387/18
 schedule 369/8, 476/2, 476/3, 476/13, 478/25, 490/6, 484/1
 schedules 461/25
 scheduling
 scope 482/10
 screen 377/12, 377/24, 381/19, 381/22, 382/13, 383/24, 386/5, 386/18, 389/4, 389/16, 390/16, 390/24, 391/4, 393/18, 395/17, 395/21, 395/22, 396/8, 396/9, 396/19, 397/11, 404/14, 405/2, 410/6, 410/20, 411/3, 430/13, 492/13, 492/17
 screens 376/15, 376/17, 377/3, 377/4, 377/11, 382/20, 383/12, 383/21, 387/15, 389/10, 390/14, 391/10, 391/11, 392/14, 396/5, 410/23, 411/9
 scroll 387/19, 389/8
 scrolling 396/10
 SEACLEC 368/7, 368/8, 423/4, 423/7, 423/10, 423/16, 423/18
 second 372/5, 380/22, 386/23, 412/11, 427/16, 445/4, 453/7, 462/10, 480/16
 seconds 377/12, 383/13, 383/16, 383/20, 386/9, 389/12, 410/6
 section 386/12, 389/15, 391/6, 393/3
 secure 493/17, 496/16
 security 400/21
 seek 453/5
 segment 472/10
 segregate 400/20
 segue 461/18
 segues 447/22
 select 376/9, 376/10, 384/17, 385/6, 386/5, 386/8, 386/11, 386/14, 453/2, 456/21
 selected 384/16, 385/10, 386/7, 460/16, 486/8, 487/13
 selecting 452/16, 460/19
 selection 383/9, 383/25, 384/15, 487/14
 selects 456/18
 sell 381/5, 406/22, 422/16, 445/7, 445/10, 445/12, 446/24, 447/8, 447/18
 selling 390/20, 506/5
 send 388/3, 404/3, 412/17, 417/7, 431/18, 431/20, 435/21, 453/12
 sending 479/13
 sense 451/2, 483/25, 484/9, 488/19, 497/18, 499/13
 sent 379/24, 385/20, 398/22, 411/20, 414/17, 415/22, 416/6, 467/24
 separate 406/5, 410/16, 474/18, 479/8, 480/17, 487/10, 488/1
 September 510/15
 series 383/9, 506/10
 serves 465/2
 SERVICE 367/1, 370/6, 370/14, 371/15, 371/18, 372/10, 373/17, 373/25, 375/3, 376/1, 376/5, 376/12, 376/19, 381/21, 393/21, 398/14, 399/4, 401/2, 405/8, 406/23, 411/22, 411/24, 413/10, 413/12, 414/7, 415/24, 416/16, 416/21, 423/25, 424/11, 424/12, 424/20, 424/25, 425/8, 425/15, 430/8, 434/14, 438/14, 439/4, 439/15, 439/17, 440/10, 448/3, 455/2, 455/6, 463/7, 466/3, 467/1, 469/22, 470/3, 470/21, 473/5, 473/12, 473/18, 474/24, 481/8, 485/22, 486/2, 492/1, 493/17, 495/6, 495/8, 495/18, 496/9, 497/14, 500/5, 500/10, 503/3, 503/13, 514/5
 services 376/3, 376/10, 376/18, 376/22, 377/16, 396/11, 404/16, 427/12, 427/17, 427/18, 430/16, 430/18, 432/15, 434/5, 444/5, 444/6, 455/11, 455/23, 464/22, 465/18, 469/21, 482/9, 484/24, 493/13, 498/4, 498/25
 set 404/2, 453/2, 459/11, 460/5, 487/9, 489/2
 set-up 402/16
 setting 505/25
 seven 414/21, 494/21
 Shaking 395/23
 share 370/15, 380/9, 380/14, 381/7, 381/9, 423/25
 shared 463/1
 sharing 381/2, 463/3
 sheet 413/17, 414/11, 415/17
 sheets 392/13, 413/24
 shelf 381/5
 shifted 458/22
 shipped 394/18
 shoes 453/16
 short 445/3
 shortage 384/4

shortening 476/10
show 386/23, 387/18, 390/4, 462/24
shows 382/25, 397/12, 492/21, 494/14
side 426/14, 440/14, 498/2, 505/21
sides 512/3
sign 378/7, 489/4
signatory 487/11
signature 425/7
signed 374/19, 403/6, 431/7, 440/2, 495/17, 509/16, 511/5, 511/6
signs 379/14, 488/6
simplified 424/23
simulate 469/1
simulating 462/18, 469/16
single 372/1, 375/3, 382/18, 474/7
sit 409/14
site 437/12, 474/24, 494/5, 494/11
sitting 376/19, 423/5
situation 415/12, 418/6, 422/20, 427/9, 437/4, 439/16, 440/1, 443/18, 471/9, 498/14, 498/15
six 401/25, 402/1, 405/22, 405/24, 405/25, 406/12, 414/21, 423/19, 429/24, 431/13, 480/4, 494/20, 501/2
skill 453/2
skills 496/4
skirt 457/4
slash 390/4
slide 432/12, 432/17, 462/20, 472/24, 480/4, 485/12
slides 432/7, 464/13, 479/1
slew 377/12, 383/17, 496/22
slowdown 379/1
small 379/8, 380/6, 403/5, 417/10, 418/3, 418/19, 418/23, 424/8, 424/10, 437/3, 438/24, 438/25, 443/3, 473/4, 495/3
smaller 472/8
SOCS 398/5
software 379/9, 425/9, 425/16, 430/12, 492/6, 492/15, 493/15, 495/6, 507/4
sold 455/11, 496/14
sole 483/15
solicited 488/20
solution 422/11, 457/9
solutions 456/7
solve 452/11, 452/12
solved 493/11
sort 374/1, 395/17, 426/9, 437/11, 438/20, 443/5, 443/19, 448/15, 450/15, 452/15, 457/25, 460/19, 489/14, 490/4, 505/11, 506/15
sound 393/12
sounded 422/10
sounds 422/6, 488/5, 488/9, 489/16, 490/6
source 468/9
sources 466/17, 466/23
south 382/1, 382/5, 382/7, 484/14
southeast 382/1, 382/5, 382/7
Southeastern 423/10
southern 384/4
Southwest 382/14, 383/3
Southwestern 434/5
space 387/6, 454/3
spaces 391/25
SPEAKER 504/7
specialty 384/5
specifications 404/14, 405/3, 446/2, 488/7
specified 405/7, 405/21, 406/20, 406/25
specify 394/17, 488/4
spectrum 449/16, 449/22
speech 500/20
speed 377/10, 377/24, 378/9, 387/23, 442/21
spend 379/11, 448/18, 448/19, 449/2
spent 379/9, 379/10, 416/20, 497/11
spirit 501/8
sponsored 463/9
spread 483/20
spreadsheet 426/24
Sprint 401/3, 419/10, 419/11, 419/12, 421/10, 424/17, 424/20, 425/18, 426/8, 429/7, 430/9, 430/19, 431/2, 431/3, 431/4, 431/7, 431/10, 432/18, 433/12, 433/13, 434/3, 505/20
Sprint's 420/25, 427/25, 429/14, 430/17
Sprint-United 403/8, 418/11, 418/14, 418/21, 419/16, 420/12, 421/4
Sprint-United's 420/18
spurns 464/11
Staff 401/8, 407/17, 407/23, 409/10, 461/4, 462/3, 468/2, 472/13, 474/10, 474/22, 477/8, 477/11, 477/14, 478/1, 478/13, 478/17, 478/19, 479/19, 483/14, 483/17, 485/16, 488/21, 488/25, 491/10, 504/19, 504/21, 512/22
staffing 483/13, 483/16, 483/21
stage 466/2
stakeholders 477/12
stand 421/3, 423/4, 477/20, 495/23
standard 439/8, 439/10, 485/15, 491/3, 491/5, 491/6
standards 471/5, 471/14, 491/8, 501/4

standing 419/10, 423/13
start 376/13, 381/17, 388/5, 396/21, 396/25, 411/13, 431/14, 432/20, 433/3, 445/25, 458/1
start-up 423/21
started 378/1, 431/3, 433/12, 449/12, 458/2, 478/24, 479/25, 480/23, 490/18, 502/14, 502/22
starting 380/17, 457/25, 460/23, 482/3, 492/3
starts 390/19
state 463/7, 418/19, 422/17, 436/13, 443/4, 452/7, 457/20, 462/19, 464/20, 465/10, 465/17, 465/19, 465/20, 466/14, 472/17, 476/15, 482/14, 482/18, 482/25, 483/5, 483/7, 483/14, 483/15, 484/3, 485/4, 485/10, 485/13, 489/1, 490/7, 490/8, 490/12, 509/8, 514/1
statement 503/19
statements 511/21
states 434/1, 436/13, 440/21, 457/18, 462/6, 482/18, 483/2, 483/18, 483/22, 484/1, 484/19, 484/25, 486/12, 490/1
static 380/21, 380/24
statistics 415/2, 470/5, 490/22
Status 367/5, 375/6, 405/11, 478/6
stemming 442/17
stenographically 514/7
step 444/7, 447/6, 452/16, 453/7, 453/16, 454/14, 485/21
Stephen 461/10
stepping 458/14
steps 444/17, 451/7, 452/16, 452/25, 456/13, 456/16
Steve 500/19, 503/9
strange 393/11, 393/12, 395/17, 448/15
strategies 447/23, 448/5
strategy 447/20, 449/5, 488/10
streets 426/25
stress 459/18
stretching 490/15
stricter 409/7
strikes 373/15
stripped 507/3, 507/16, 507/23, 507/24
strong 493/12
structured 458/9, 460/1, 460/2
structures 496/8
stuck 392/15
stuff 426/20
stumble 382/17, 450/16
stumbles 450/14
subject 446/18, 512/15
submit 408/7, 416/2, 416/3, 416/4, 416/5, 416/9, 417/4, 417/16, 419/1, 428/19, 431/8, 431/9, 432/8, 436/4, 470/16, 492/8, 497/9, 497/15
submits 468/17
submitted 408/1, 408/6, 412/6, 414/1, 414/2, 414/20, 436/7, 437/6, 511/24
submitting 404/7, 408/4, 493/21, 496/12
subjects 388/20
successful 466/12, 466/16, 485/20, 485/24
sufficient 506/16
suggestion 400/4
suite 474/17
summary 413/23
Summerlin 423/8
supervisor 402/25, 434/18, 434/19
supervisor's 434/20, 434/21
supply 452/8
supplying 456/25
support 367/6, 443/15, 443/21, 443/25, 453/9, 462/17
supportive 424/2, 457/21
supports 486/1
Supra's 371/15, 379/10
surfing 410/22
surreal 479/4
SUSAN 367/13
suspect 381/6
suspend 415/23, 416/11, 416/12
suspended 417/13, 431/5, 431/8
suspends 405/7
suspension 415/22
Suzanne 423/8
SW 382/16
swear 421/3
switch 371/7, 428/9, 453/21, 454/4, 455/21, 458/19, 494/24, 495/1, 495/16
switched 495/11
switches 500/2
switching 455/20
sync 393/6
system 374/12, 375/21, 376/4, 378/3, 378/6, 380/1, 382/18, 383/7, 385/9, 387/1, 390/11, 393/11, 395/7, 396/2, 397/19, 397/20, 399/9, 400/18, 400/20, 401/13, 403/2, 404/13, 407/25, 411/5, 414/17, 414/22, 415/9, 419/15, 419/18, 420/6, 420/18, 421/1, 421/5, 421/13, 421/22, 425/10, 425/11, 425/20, 427/4, 427/7, 428/12, 428/19, 429/16, 433/14, 435/2, 435/16, 443/15, 445/6,

445/11, 445/18, 447/8, 447/9, 447/17, 450/13, 455/12, 459/18, 471/4, 471/12, 471/18, 471/20, 476/23, 484/14, 493/5, 494/20, 496/16, 506/14, 506/15, 507/1, 512/3
system's 482/7
systematic 451/5
systems 367/6, 370/25, 381/14, 383/17, 390/1, 392/22, 392/25, 398/25, 400/10, 418/12, 420/22, 442/6, 442/8, 442/13, 443/10, 443/12, 443/17, 445/3, 449/15, 449/22, 450/15, 451/11, 451/13, 452/6, 457/3, 464/10, 464/17, 465/7, 468/18, 471/3, 471/11, 471/13, 473/15, 475/24, 477/1, 478/20, 482/1, 482/4, 482/16, 482/21, 483/4, 483/10, 484/12, 485/5, 502/10, 502/11, 507/8, 508/19, 510/16

T

T-1 378/4, 378/14
table 447/16
TAFI 403/9
TAG 369/23, 370/3, 371/1, 371/2, 371/5, 378/1, 378/2, 379/5, 379/6, 379/13, 379/14, 379/24, 379/25, 388/17, 396/3, 396/4, 396/6, 400/2, 400/4, 403/11, 417/24, 418/5, 421/8, 422/19, 445/19, 471/1, 471/6, 505/20, 511/14, 512/9
tailored 484/24
takers 434/16
take 498/8
talk 385/24, 399/15, 400/12, 403/3, 407/20, 424/6, 434/18, 442/6, 461/21, 461/24, 464/13, 482/12
talked 371/24, 416/1, 436/10, 440/13, 474/5
talking 369/19, 369/20, 381/1, 382/24, 390/23, 391/13, 395/6, 395/9, 397/8, 400/14, 400/15, 410/10, 418/4, 446/19, 502/14, 509/13, 509/14
Tallahassee 367/19, 491/23
Tampa 500/22
target 390/23, 463/7
targets 466/24
tariffs 503/7
taught 448/12
tax 426/1, 426/6, 426/19, 426/22, 427/1, 427/6, 427/9, 430/14, 436/10
taxes 426/3, 426/25, 427/14, 430/15, 436/12, 436/15
TCCF 368/5, 403/7, 406/24, 492/14
teach 448/23
teaching 448/18
team 413/11, 508/2
tech 438/12
technical 403/1, 466/3, 510/5
technicians 378/25
technologically 400/19, 400/22
technology 380/12, 449/17, 498/10
techs 437/17, 438/7, 438/14
teed 505/5
Telcordia 422/1, 460/12, 460/13, 460/16, 505/21
Telecom 369/18, 443/19
telecommunication 495/21
telecommunications 427/11
telephone 373/17, 386/6, 391/23, 402/5, 402/22, 404/17, 428/24, 428/25, 437/25, 438/2, 438/4, 438/8, 438/15, 440/9, 459/19, 473/9, 473/19
Telephonic 380/21, 380/24, 385/13
tend 382/17, 397/6
tends 371/9
Tennessee 434/2
tenth 396/20
term 439/15, 490/9
terminated 439/19
terms 371/18, 402/10, 419/25, 452/14, 468/2, 470/2, 474/3, 479/13
territory 418/10, 418/11, 418/15, 418/17, 434/6, 482/15
TERRY 367/12
test 380/1, 443/8, 444/15, 445/11, 445/15, 445/22, 446/3, 447/1, 448/5, 448/8, 449/5, 449/14, 449/15, 450/6, 450/9, 450/22, 451/21, 451/23, 452/2, 452/15, 452/19, 452/21, 453/10, 453/13, 453/20, 453/23, 454/3, 454/9, 454/16, 455/5, 456/5, 456/7, 456/10, 456/15, 458/7, 458/22, 458/24, 459/6, 459/11, 459/12, 459/13, 460/3, 460/5, 460/10, 460/15, 460/18, 460/20, 461/11, 461/12, 461/14, 461/18, 461/23, 462/2, 462/5, 462/13, 462/23, 463/1, 463/9, 463/13, 464/15, 464/18, 464/24, 464/25, 465/3, 465/4, 465/5, 465/7, 465/11, 465/13, 465/14, 465/16, 465/23, 466/19, 466/22, 467/10, 467/11, 467/13, 467/22, 468/5, 468/9, 468/17, 469/14, 469/19, 469/24, 469/25, 470/2, 470/3, 470/11, 471/4, 471/9, 472/16, 472/17, 472/23, 473/3, 473/7, 473/12, 474/7, 474/11, 474/15, 474/17, 474/19, 475/20, 476/5, 476/8, 476/16, 476/17, 476/21, 477/15, 477/17, 477/23, 478/9, 478/12, 478/15, 478/16, 479/6, 479/16, 479/17, 479/20, 479/22, 480/1, 480/12, 480/18, 480/20, 481/17, 481/20, 481/21, 481/22, 482/3, 482/10, 482/20, 482/24, 483/4, 483/6, 483/9, 483/12, 483/24, 484/3, 484/11, 484/20, 484/22, 485/3, 485/7, 485/8, 485/10, 485/19,

485/20, 485/24, 486/15, 486/16, 486/18, 486/23, 487/1, 487/2, 487/3, 487/9, 487/16, 487/25, 488/3, 488/15, 488/18, 488/21, 488/25, 489/7, 489/20, 489/21, 489/22, 490/2, 500/8, 500/13, 510/25, 512/15, 512/16
tested 453/25, 455/13, 456/1, 465/8, 465/17, 470/10, 471/13, 484/2, 484/24, 489/19, 497/23
teating 378/10, 443/17, 446/16, 449/4, 449/12, 451/2, 451/3, 451/4, 454/7, 454/24, 455/4, 455/10, 457/19, 458/5, 458/23, 459/22, 461/20, 461/22, 462/5, 463/20, 464/3, 465/13, 466/6, 466/10, 468/16, 471/15, 472/19, 474/6, 474/12, 476/11, 476/24, 477/18, 478/6, 479/11, 479/12, 479/18, 482/12, 482/13, 484/6, 484/9, 485/13, 492/21, 492/23, 505/7, 505/15, 505/16, 506/4, 506/8, 509/1, 510/24, 512/10
Texas 447/21, 449/19, 451/8, 458/11, 458/20, 459/18, 468/13, 468/14, 468/15, 469/6, 474/18, 477/19, 482/8, 489/12, 510/13
Texas 436/15, 457/24, 459/21
Thank 375/24, 401/9, 401/10, 402/7, 402/13, 402/14, 411/7, 421/24, 422/21, 440/17, 441/22, 441/23, 461/3, 461/5, 486/6, 486/7, 491/15, 491/16, 491/23, 500/18, 503/21, 503/24, 507/14, 511/9, 512/20, 512/21, 513/8, 513/15
Thanks 377/5
theoretical 447/11
theories 405/24
theory 442/14
Thereupon 513/16
they've 441/3, 441/5, 444/2, 450/22, 450/23, 453/18, 460/16, 463/2, 501/8
thick 426/21
third 395/14, 397/10, 403/20, 444/9, 445/22, 446/3, 450/12, 450/17, 451/1, 451/6, 451/10, 452/17, 452/19, 452/22, 453/2, 453/16, 453/20, 454/5, 454/20, 455/16, 456/18, 456/21, 456/25, 457/8, 458/10, 458/18, 459/17, 460/12, 460/17, 460/20, 463/2, 505/25
third-party 442/8, 443/8, 444/15, 445/22, 446/16, 446/25, 449/12, 449/18, 451/21, 452/14, 456/14, 456/15, 457/19, 458/5, 460/10, 460/18, 461/14, 461/20, 461/22, 461/23, 462/13, 462/23, 463/13, 464/3, 464/24, 465/14, 485/12, 505/7, 505/15, 506/8, 508/16, 510/24, 512/15
thousand 444/22, 445/2
thousands 444/22, 490/21, 511/1
three 376/12, 376/14, 380/2, 385/19, 388/4, 390/22, 391/2, 398/23, 400/15, 403/7, 403/23, 403/25, 406/16, 407/16, 408/16, 408/25, 414/21, 416/16, 417/18, 428/15, 429/1, 430/2, 435/8, 435/18, 435/20, 437/4, 443/9, 445/8, 449/11, 449/12, 456/6, 458/8, 460/22, 462/21, 463/18, 465/14, 466/23, 467/3, 479/1, 491/8, 497/12, 498/20, 502/5, 505/23
three-way 387/22, 389/3, 486/25
throw 447/2
ticket 432/25, 433/2
tickets 473/23
TIME 367/16, 371/2, 379/21, 379/23, 380/4, 381/16, 383/12, 385/12, 385/24, 391/12, 395/9, 395/14, 398/24, 398/25, 399/15, 399/16, 402/8, 402/16, 404/1, 408/12, 408/13, 408/15, 408/19, 409/6, 410/13, 411/3, 411/12, 411/13, 411/16, 411/19, 411/20, 412/24, 413/5, 414/6, 414/9, 416/20, 420/3, 422/22, 430/17, 430/20, 432/11, 435/25, 440/21, 441/4, 445/3, 447/4, 449/2, 449/18, 452/7, 455/6, 460/2, 462/2, 466/14, 469/3, 469/19, 469/23, 474/12, 476/7, 476/24, 478/25, 479/14, 479/25, 492/11, 492/12, 492/16, 493/3, 493/19, 496/10, 497/12, 500/18, 503/21, 504/17, 507/13, 512/11, 512/22, 514/6
timely 449/8, 501/10, 501/15
times 399/18, 399/22, 410/3, 415/8, 496/20, 497/11, 498/6, 498/16
timing 379/22
toe 484/8
Tone 368/14, 500/14, 500/19
top 419/8, 470/11
totaling 491/7
tourist 426/19
track 391/11, 402/5, 411/12, 461/8
tracks 425/12
trade 443/1
traditional 449/20
training 379/25, 392/21, 392/23
transact 464/9
transaction 370/9, 407/22, 463/20, 468/15, 470/5, 473/11, 476/9, 479/18, 480/18, 485/1, 487/8, 487/25
transactions 463/25, 468/14, 468/20, 468/22, 468/23, 468/25, 470/6, 470/10, 471/19, 474/4, 475/18, 479/13, 482/10, 483/1, 483/3, 483/5, 483/7, 484/10, 484/20
transcribed 514/8
transcript 511/19, 514/8
transcription 514/9
transfer 386/15, 434/19
translation 481/6, 481/10
transmission 454/4, 473/14
transmitted 481/11

transport 448/2
trouble 374/20, 375/1, 393/6, 425/13, 433/8, 448/14, 469/4, 473/23
troubleshoot 383/6
troubleshooting 375/15
true 413/18, 488/12, 490/10, 514/9
truth 385/14
Tuesday 504/25
turn 433/20, 474/10
turnaround 419/4, 493/19
turned 429/2, 475/22
turning 420/3
two 370/25, 371/9, 374/22, 378/10, 378/22, 379/20, 381/15, 383/1, 385/18, 389/17, 391/1, 393/12, 395/5, 399/23, 400/15, 401/14, 408/12, 408/25, 412/7, 413/5, 413/23, 414/21, 414/22, 414/24, 416/10, 417/2, 420/22, 423/11, 423/21, 428/25, 432/16, 435/17, 438/20, 442/9, 444/6, 466/23, 468/12, 471/10, 476/10, 479/1, 480/13, 480/24, 503/13, 504/10, 505/1, 505/23, 506/6, 509/8, 509/15, 511/5, 511/6, 511/15, 513/9
type 371/17, 376/6, 381/5, 381/23, 382/19, 386/15, 386/24, 393/15, 397/1, 397/21, 407/2, 407/22, 408/3, 410/21, 411/24, 425/8, 430/10, 432/1, 432/13, 433/4, 439/8, 439/9, 441/1, 450/8, 455/6, 459/5, 462/12, 467/4, 472/8, 477/7, 481/16, 485/19, 486/10
typed 383/4
types 398/14, 401/23, 443/16, 453/24, 454/15, 457/19, 459/14, 463/25, 467/8, 468/13, 470/13, 471/19, 473/20, 474/3, 475/16, 475/18, 477/9, 477/19, 489/13
typing 393/15, 396/25

U

unauthorized 495/16
unbundled 446/19, 455/20, 506/4
uncommon 412/16
UNDOCKETED 367/4, 514/5
UNE 463/9, 508/23, 509/7
unending 506/9
UNEs 508/22, 508/25
unethical 497/5
unexpected 455/2, 455/3, 459/18
unfortunate 445/8
UNIDENTIFIED 504/7
uninformed 434/15
United 425/18
unknown 452/5
unlimited 503/12
untrained 434/15
updated 371/6, 371/8, 384/15
upgrading 498/4
upper 391/21, 394/24, 497/22
upset 384/25
useful 445/21, 478/8
user 380/5, 410/8, 469/7, 486/3
users 400/20, 402/25
USOC 396/11
USOCs 410/24
utility 370/16, 464/24, 465/1, 465/3
utilize 492/4, 496/17, 499/7
utilizing 497/25

V

valid 383/1, 383/15, 398/4
validate 383/10, 427/3, 427/5, 427/7, 428/4, 430/13
validated 441/20
validates 464/3
validating 426/4, 427/11
validation 372/7, 382/25, 404/16, 425/22, 426/1, 426/10, 426/16, 427/6, 427/7, 427/10, 430/15, 437/13
valuable 451/14, 481/15
value 458/11, 505/17
vanilla 422/15
vanky 384/5
variables 476/4
varies 411/4
vehicle 447/15
vein 375/5
vendor 417/12, 456/15
vendors 406/10, 415/20
venture 482/14, 500/16
verification 372/16, 373/5, 373/19, 394/20, 505/7, 508/16
verifies 464/19
verifying 390/16, 391/4, 393/9, 394/1
version 379/16, 468/4, 468/6, 493/23
versions 493/21
vice-president 369/17
view 371/19, 379/6, 404/16, 404/17, 404/18, 405/11, 484/23, 502/15
viewed 379/7

views 504/23
Virginia 484/15, 484/16
virtual 458/23
visit 438/9
vocal 419/7
voice 388/20, 491/21, 503/14
VOLUME 367/7, 404/5, 404/24, 443/21, 444/21, 447/18, 447/19, 451/17, 472/1, 472/2, 483/1
volumes 418/24, 451/25, 452/4, 454/18, 458/24, 459/8, 459/9, 459/10, 464/10, 465/19, 469/18, 469/20, 482/10, 482/22
vouch 496/7

W

waffling 431/16
wag 383/20, 386/8, 386/17, 389/12, 428/25, 494/16, 498/19
waking 376/20, 403/11, 428/8, 503/14
walk 498/17
wall 507/22
walls 420/19
Washington 484/16
watch 512/17
watching 473/23
water 484/8
weather 383/17
web 436/24, 437/12, 471/12, 471/18, 471/20, 472/3, 472/10, 472/14, 472/18, 474/24
Wednesday 367/15
week 379/20, 380/2, 438/19, 494/17
weekend 491/22
weekends 416/18
weeks 371/9, 378/10, 378/22, 435/8, 435/18, 435/20, 469/5, 476/7, 476/18, 480/21, 481/2, 502/5, 505/23
Welch 402/21
well-honed 490/16, 490/17
West 484/16
wheel 400/9
wherever 378/17, 456/8
white 405/7, 407/7, 442/25
wholesale 462/17, 469/7, 485/5, 485/22
wide 432/3
win 442/18
wiring 393/3
WISE 501/13, 501/18, 501/20
wishes 398/1
won 486/17
word 437/5, 439/1
words 488/4, 490/15
work 375/6, 379/3, 399/9, 404/12, 404/21, 408/14, 408/19, 409/3, 409/16, 409/22, 411/19, 411/24, 412/19, 413/2, 415/7, 416/8, 416/20, 417/15, 417/22, 433/3, 438/14, 438/17, 443/11, 443/20, 443/21, 444/9, 446/8, 452/22, 469/10, 471/7, 477/10, 494/24, 505/16, 506/7, 508/20
workability 419/25
worked 414/6, 414/8, 416/17, 416/18, 417/20, 467/21, 475/19, 488/21
working 376/1, 378/25, 383/1, 383/2, 388/23, 392/22, 400/11, 400/18, 416/23, 418/12, 419/8, 427/24, 428/8, 439/15, 439/18, 440/10, 450/5, 451/12, 460/5, 465/4, 465/9, 480/25, 492/9, 510/16
works 386/12, 386/21, 395/11, 400/6, 400/7, 438/3, 451/25, 476/23, 487/2, 490/17, 508/13
WORKSHOP 367/10, 369/2, 369/4, 423/1, 513/9, 513/16, 514/5
world 448/10, 451/25, 455/2, 455/8, 459/16, 469/15, 495/4, 497/21, 500/4, 501/11, 502/10
WorldCom 493/10
WORLDLINK 368/13, 491/19, 491/24, 496/7
worry 478/10, 503/9
wrap 433/11
wrestled 403/22
write 399/16
written 441/10, 441/16
wrong 420/16, 448/20, 449/1, 449/3, 449/6, 468/8, 497/8, 497/10, 498/21, 498/22

X

X 368/1
xDSL 448/3, 449/14, 449/23, 469/23

Y

year 400/17, 401/14, 403/10, 404/21, 415/21, 418/18, 424/14, 430/4, 444/23
years 400/15, 401/13, 403/7, 403/24, 417/18, 420/23, 435/4, 444/3, 445/8, 449/11, 449/12, 469/4, 501/2, 506/6
yellow 405/8, 407/8
York 446/25, 453/9, 457/13, 457/14, 457/24, 457/25,

458/4, 458/7, 459/5, 460/22, 461/13, 461/18, 461/24,
464/14, 466/1, 466/2, 466/23, 469/18, 469/22, 471/10,
472/12, 472/14, 472/21, 472/25, 474/7, 474/23, 475/15,
477/11, 478/8, 478/16, 478/22, 479/2, 479/8, 479/11,
479/12, 480/7, 480/11, 480/18, 481/14, 481/23, 482/2,
482/5, 484/13, 486/9, 486/12, 486/22, 486/25, 487/16,
487/23, 487/25
YY 390/4