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.)

FLORIDA PUBLIC SERVICE COMMISSION

1   **I N D E X**

2   **MISCELLANEOUS**

3

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 replow 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 two 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 guestimate 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 guestimate 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 looks 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 Roaderick 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. Roaderick take it over.

5   **MR. ROADERICK:** I appreciate you letting me

6   talk to you today. Again, my name is a Jeff Roaderick

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,

there's a lot of confusion as to how convert orders

are supposed to be done with Sprint. When we first

started processing orders with Sprint they told us

that, and this is in regards to converting a Sprint

customer who is currently suspended. Okay. We get a

lot of those.

When we first signed on with Sprint, they

said, you must submit -- because they are suspended,

you must submit the order as a new installation.

Okay. Even though, they're a customer of Sprint. We

should be doing it as a convert, but they wanted us to

do it as a new installation.

So we did that for about six months. They

changed the policy. They wanted us to start doing

them as converts. And now, over the past few months,

they're waffling back and forth between doing them as

new installs or doing them as converts. And sometimes

we'll send them up as a convert and they'll get

rejected. Some will go through okay. Sometimes we'll

send them up as a new install. We'll get rejected.

Some will go through okay. So there's a real

inconsistent policy as far as how they want us to do

it. Okay.

Now, if we were converting a customer from

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.

FLORIDA PUBLIC SERVICE COMMISSION

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

until late in the process where they could do hot cuts

to see that a customer had been converted to another

network, and the LNP had followed it. That came about

too late. So I think, while some of it is going on in

New York, it didn't get the type of emphasis that I

think you would do if you were designing a test now,

knowing what we know.

Commercial volumes. They never pushed

through enough commercial volumes or something close

to commercial volumes as they could. And again, part

of this goes back to the way they set up the test.

Since Bell Atlantic knew exactly what test resources

it was going to use, what test lines were going to

happen and the types of things that were going to

happen to it, they could prepare in advance far more

than they could in the real world. So you need these

other resources in there so that, as a third party

runs tests, it can stress the system in unexpected

ways, ways that the telephone company isn't prepared

for.

Texas, I'm not as familiar with. I know

that one of it's problems is that it's not testing the

ability of carriers to develop an interface. My

understanding is they're either using AT&T or MCI's

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 metics 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

order of 130 scenarios for customer interactions with

the ILEC. These scenarios get broken down to specific

test cases. So, for example, a scenario might be a

migration as-is of a small business customer to a CLEC

in the resale using a resale as a service of a

remechanism.

The individual test case for that, and there

will be many, would be migrating a particular

telephone number, a particular account, on the fifth

business day after receipt of that order.

The transaction which is generated from that

test case, would be the local service request, the

LSR, which we would begin developing and putting into

the correct EDI format for transmission into the

ILEC's systems.

We did this across the entire customer life

cycle so we do -- some examples for preorder, we do

the customer service record retrieval. We do a

telephone number reservation, a whole host of other

types of preorders. The order might be the migrate

as-is. For provisioning we'd be doing pair

assignments in the field, maintenance and repair.

We'd be generating trouble tickets and watching that

process. And then, of course, for the billing, we'd

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 a 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. DELATOUR:** 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 WORLDLINK 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 are any other questions.

2   **COMMISSIONER DEASON:** Are there any other

3 questions? (No response.)

4   I believe not. It may have something to do

5 with the hour.

6   **MS. KEATING:** That's a possibility.

7   **COMMISSIONER DEASON:** Let me take this

8 opportunity to thank everyone who has participated in

9 this workshop. It's been an extremely full two days,

10 but I think it's been very informative, which is what

11 this whole process was about, to try to eliminate some

12 of the formality and try to get as much information

13 presented in an effective manner. And we appreciate

14 everyone's participation.

15   Thank you.

16   (Thereupon, the workshop concluded

17 at 5:35 p.m.)

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1 STATE OF FLORIDA)
                    :   CERTIFICATE OF REPORTERS
2 COUNTY OF LEON   )

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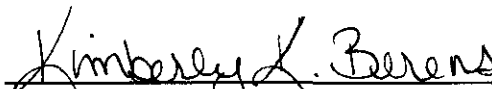
          We, H. RUTHE POTAMI, CSR, RPR, and KIM
4 BERENS, RPR, FPSC Commission Reporters;

5   DO HEREBY CERTIFY that the undocketed OSS
   Workshop was heard by the Florida Public Service
6 Commission at the time and place herein stated; it is
   further
7
          CERTIFIED that we stenographically reported
8 the said proceedings; that the same has been
   transcribed by us; and that this transcript,
9 consisting of 513 pages, constitutes a true
   transcription of our notes of said proceedings.
10
          DATED this 19th day of May, 1999.
11

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13

14 H. RUTHE POTAMI, CSR, RPR
   Official Commission Reporter
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17 KIMBERLY K. BERENS, CSR, RPR
   Official Commission Reporter
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FLORIDA PUBLIC SERVICE COMMISSION

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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