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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF RONALD M. PATE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 990750-TP
SEPTEMBER 13, 1999

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

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing. I joined BellSouth in 1987, and have held various positions of increasing responsibility.

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Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes. I filed direct testimony on August 16, 1999.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut the direct testimony of ITC^DeltaCom witnesses: Mr. Michael Thomas, Mr. Thomas Hyde, Mr. Christopher J. Rozycki and Mr. Don J. Wood.

Q. MR. THOMAS (PAGES 3-5) AND MR. WOOD (PAGES 12-13) ALLEGE THAT BELLSOUTH IS NOT PROVIDING NONDISCRIMINATORY ACCESS TO ITS OSS SYSTEMS AND DATABASES. PLEASE COMMENT.

A. As I described in my direct testimony, BellSouth provides nondiscriminatory electronic interfaces to its Operations Support Systems ("OSS") for Alternative Local Exchange Companies ("ALECs"). The interfaces provided by BellSouth allow ALECs to perform functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for resale services in substantially the same time and manner as BellSouth does for itself; and, in the case of unbundled network elements, provide a reasonable competitor with a meaningful

1 opportunity to compete. BellSouth is not obligated to provide ALECs
2 with any additional access to its OSS.

3

4 Q. ON PAGE 13 OF HIS TESTIMONY, MR. ROZYCKI STATES THAT
5 "BELLSOUTH'S OSS CURRENTLY DOES NOT WORK". MR. WOOD
6 STATES ON PAGE 9 THAT "THE EXISTING OSS EMPLOYED BY
7 BELLSOUTH IS NOT WORKABLE." DO YOU AGREE?

8

9 A. No. If the electronic interfaces to BellSouth's OSS did not work, then
10 ALECs would not use them. Supporting data reflects their use and
11 continued growth. As a point of reference, in August 1998, a total of
12 159,543 local service requests (LSRs) were processed by BellSouth.
13 From that total, 118,257 (74.1%) were submitted manually and 41,286
14 (25.9%) were submitted electronically. By contrast, in July 1999, the
15 total submission of LSRs grew by 23% to 196,608. In conjunction with
16 experiencing tremendous growth, the LSR submissions have shifted to
17 51.5% (101,234 LSRs) submitted manually and 48.5% (95,374 LSRs)
18 submitted electronically. Of particular note is the growth in submissions
19 using the Electronic Data Interchange ("EDI") ordering interface which
20 is the interface of choice for ITC^DeltaCom. In August 1998, BellSouth
21 processed 8,659 LSRs received via EDI. Over the past 6 months
22 (February 1999-July 1999), CLECS submitted monthly on average
23 18,046 LSRs in EDI. This average represents a 108% increase. In
24 addition, the combined flow through rate for the electronic interfaces
25 was 90.1% for July 1999. The facts speak for themselves. The

1 electronic interfaces to BellSouth's OSS work and the ALEC community
2 as a whole have found their deployment to be effective.

3

4 Q. IS BELLSOUTH REQUIRED TO PERFORM THE INTERGRATION OF
5 INTERFACES FOR ALECS?

6

7 A. No. Contrary to the implication in the testimony of Mr. Thomas (pages
8 3-4), the Federal Communications Commission ("FCC") has not
9 ordered BellSouth to integrate pre-ordering and ordering interfaces.
10 There is no requirement in the Telecommunications Act of 1996 or in
11 any order by the FCC that makes BellSouth responsible for performing
12 the "integration" of pre-ordering [Local Exchange Navigation System
13 ("LENS") and Telecommunication Access Gateway ("TAG")], ordering
14 (LENS, TAG and EDI), with the ALECs' own OSS systems. BellSouth
15 provides integratable, national standard, machine-to-machine interfaces
16 for pre-ordering and ordering that ALECs, including ITC^DeltaCom,
17 may integrate with their own internal OSS. Integration is the
18 responsibility of the ALEC. This allows ALECs to tailor the interfaces
19 and the information received via the interfaces in the best manner
20 possible to suit their own individual business needs.

21

22 Q. MR. ROZYCKI (PAGE 10) STATES THAT "BELLSOUTH'S
23 OPERATIONS SUPPORT SYSTEMS ("OSS") CURRENTLY FALL FAR
24 SHORT OF PROVIDING A COMPETITIVE ALTERNATIVE TO
25 BELLSOUTH'S OWN INTERNAL SYSTEMS". MR. ROZYCKI

1 FURTHER CLAIMS (PAGE 13) THAT DELTACOM SHOULD NOT BE
2 REQUIRED TO PAY FOR OSS BECAUSE ITC^DELTACOM "DID NOT
3 REQUEST A SEPARATE SYSTEM BE CONSTRUCTED FOR IT.
4 ITC^DELTACOM CONSIDERS IT ACCEPTABLE TO HAVE DIRECT
5 ACCESS INTO BELLSOUTH'S EXISTING OPERATIONAL SUPPORT
6 SYSTEMS. BELLSOUTH CHOSE TO CONSTRUCT A SEPARATE
7 SYSTEM FOR ALECs TO USE FOR PREORDERING, ORDERING,
8 PROVISIONING, AND MAINTENANCE." PLEASE COMMENT.

9
10 A. ITC^DeltaCom's claim confuses the issues of access, interfaces, and
11 OSS. As I stated in my direct testimony in response 2(a)(1), the
12 Telecommunications Act of 1996 at Section 251(c)(3) only requires that
13 BellSouth provide nondiscriminatory access to network elements,
14 including OSS. First, ITC^DeltaCom *does* have direct access to
15 BellSouth's existing OSS via the electronic interfaces, just as
16 BellSouth's retail units access BellSouth's existing OSS via the
17 interfaces they use. In the case of access to maintenance and repair
18 OSS, BellSouth and ALECs can use the same interface, TAFI. As I
19 described in my direct testimony in response to ITC^DeltaCom's Issue
20 3(m), the difference between ALEC TAFI and BellSouth TAFI is that
21 ALEC TAFI combines functionality for both residential and business
22 services, while BellSouth must use separate TAFI interfaces for its
23 residential and business retail units.

24

1 What ITC^DeltaCom seems to be claiming is that it should not have to
2 pay for the electronic interfaces to BellSouth's OSS because it wants to
3 use the same interfaces used by BellSouth for its retail customers.
4 First, the Telecommunications Act of 1996 does not require identical
5 access, but rather non-discriminatory access. Second, BellSouth does
6 not have a single system that it uses for its own customers, nor are the
7 systems used by BellSouth suitable for ALECs. As I discussed in my
8 direct testimony, BellSouth uses three different systems for ordering:
9 Regional Negotiation System ("RNS") for residential customers
10 throughout BellSouth's region; Direct Order Entry ("DOE") for business
11 customers in Florida, Georgia, North Carolina, and South Carolina; and
12 the Service Order Negotiation System ("SONGS") for Alabama,
13 Kentucky, Louisiana, Mississippi, and Tennessee. DOE and SONGS
14 also are used for types of residential transactions that are not handled
15 by RNS. Thus, if ALECs were to use the "same interfaces" as
16 BellSouth, they would have to implement three different interfaces to
17 place orders in BellSouth's region. There are other problems with
18 ITC^DeltaCom's suggestion as well. For example, RNS does not
19 support the most basic types of ALEC resale orders, "switch-as-is" and
20 "switch-with-changes." Another problem would be industry standards.
21 RNS, DOE, and SONGS do not follow the industry standards for
22 ordering, and do not follow the proposals emerging from the industry
23 committee. Finally, RNS, DOE, and SONGS do not support the

1 ordering of UNEs. It is clear that BellSouth's decision to build electronic
2 interfaces to its OSS for the ALECs was a reasonable one.

3 Q. ON PAGE 5 OF HIS TESTIMONY, MR. THOMAS STATES THAT "THE
4 PRODUCTION OF THE CSR PARSING SPECIFICATIONS AND THE
5 RSAG HAVE BEEN ORDERED BY THE FLORIDA PUBLIC SERVICE
6 COMMISSION". PLEASE COMMENT.

7
8 A. The Commission Order issued in Florida was interpreting an existing
9 interconnection agreement and, thus, should not be considered in this
10 proceeding. The conclusion reached in Florida was based on the
11 provisions of the Interconnection Agreement of BellSouth and the ALEC
12 involved. The Commission's decision did not establish what BellSouth
13 is required to do under the Telecommunications 1996 Act of 1996 which
14 is the issue in this arbitration dispute.

15
16 Q. ON PAGE 5 OF MR. THOMAS' TESTIMONY, HE STATES THAT
17 "ABSENT A PRE-ORDERING INTERFACE THAT INTEGRATES WITH
18 EDI, ITC^DELTACOM NEEDS THE ABILITY TO: (1) PARSE
19 CUSTOMER SERVICE RECORDS ("CSRs"); (2) ELECTRONICALLY
20 RECEIVE DOWNLOADS OF THE REGIONAL STREET ADDRESS
21 GUIDE ("RSAG")". DOES BELLSOUTH ALREADY PROVIDE
22 ITC^DELTACOM AND OTHER ALECS CSR INFORMATION IN A
23 MANNER THAT CAN BE PARSED?

24

1 A. Yes. As I described in my direct testimony, BellSouth implemented the
2 TAG pre-ordering interface, based on the Common Object Request
3 Brokering Architecture (CORBA) on August 18, 1998. TAG is a
4 national standard machine-to-machine interface that can be integrated
5 with either the TAG ordering interface (available since November 1,
6 1998) or the EDI ordering interface (available since December 31,
7 1996). EDI is the ordering interface used by ITC^DeltaCom. The CSR
8 data which is delivered to the ALEC via TAG can be parsed by the
9 ALEC to exactly the level needed on an order, just as BellSouth parses
10 CSR's in its own retail operations.

11
12 Q. MR. ROZYCKI ON PAGE 13 OF HIS TESTIMONY STATES THAT
13 "BELLSOUTH HAS NOT COMMITTED TO PROVIDING
14 ITC^DELTACOM A DOWNLOAD OF THE RSAG DATABASE
15 INCLUDING UPDATES". DO YOU AGREE?

16
17 A. No. I do not agree. As stated in my direct testimony, BellSouth has
18 made a proposal to ITC^DeltaCom to provide a download of RSAG at
19 rates and conditions to be negotiated.

20
21 Q. MR. THOMAS, ON PAGE 6, OF HIS TESTIMONY STATES THAT
22 "THE FCC HAS FURTHER CONCLUDED THAT IN ORDER FOR
23 BOCS TO DEMONSTRATE NONDISCRIMINATORY ACCESS TO
24 OSS FUNCTIONS, A BOC MUST 'PROVIDE THE SAME ACCESS TO
25 COMPETING CARRIERS THAT IT PROVIDES TO ITSELF.' BY

1 REQUESTING THE . . . RSAG INFORMATION, ITC^DELTACOM IS
2 SIMPLY ASKING BELLSOUTH TO PROVIDE THE SAME ACCESS
3 TO THE OSS INFORMATION THAT BELLSOUTH PROVIDES TO
4 ITSELF." PLEASE COMMENT.

5
6 A. As previously stated, BellSouth's electronic interfaces provide ALECs
7 with access to BellSouth's OSS for the required functions and
8 informational databases, i.e. RSAG, in substantially the same time and
9 manner as BellSouth provides to its retail customers. BellSouth is not
10 obligated to provide ALECs with any additional OSS.

11
12 Q. ON PAGE 5 OF MR. THOMAS TESTIMONY, HE STATES THAT " AN
13 ELECTRONIC DOWNLOAD OF THE RSAG DATABASE . . . WILL
14 ALLOW ITC^DELTACOM TO INCORPORATE THIS INFORMATION
15 INTO ITC^DELTACOM'S BACK OFFICE SYSTEMS TO CHECK
16 VALIDITY OF THE CUSTOMER'S ADDRESS, JUST AS
17 BELLSOUTH'S SYSTEMS USE THE RSAG DATABASE TO CHECK
18 BELLSOUTH'S ORDERS." PLEASE COMMENT.

19
20 A. Throughout its Petition for Arbitration and the draft interconnection
21 agreement, ITC^DeltaCom stresses the importance of an electronic
22 interface for pre-ordering for real-time access to BellSouth's OSS.
23 BellSouth offers such access via LENS and TAG. Yet, by requesting a
24 download of RSAG, ITC^DeltaCom apparently wants a less efficient
25 means of data access. Moreover, ITC^DeltaCom wants this less

1 efficient means of data access at no charge. As stated on page 29 of
2 Mr. Wood's testimony, "ITC^DeltaCom proposes that BellSouth will
3 transmit a subset of the RSAG to ITC^DeltaCom on a daily basis at no
4 charge . . . ". As discussed previously, BellSouth has made a proposal
5 to ITC^DeltaCom to provide a download of Regional Street Address
6 Guide (RSAG) at rates and conditions to be negotiated.

7
8 Q. MR. THOMAS, ON PAGE 5 OF HIS TESTIMONY, STATES THAT "BY
9 HAVING THE ABILITY TO PARSE THE CSR, ITC^DELTACOM CAN
10 BUILD CSR INFORMATION INTO THE EDI ORDER WITHOUT
11 HAVING TO REKEY INFORMATION". PLEASE COMMENT.

12
13 A. If ITC^DeltaCom were to integrate TAG with its EDI ordering interface,
14 it would eliminate any need to rekey or re-enter information. When
15 integrated, TAG will populate the CSR information and RSAG
16 information into the EDI or TAG ordering interface, whichever the ALEC
17 chooses to use.

18
19 Q. MR. THOMAS OF ITC^DELTACOM, ON PAGE 17 OF HIS
20 TESTIMONY, CLAIMS THAT THE LOCAL CARRIER SERVICE
21 CENTER ("LCSC") IS OPEN 8:00A.M. TO 5:00 P.M. IS THIS
22 CORRECT?

23
24 A. No.

25

1 Q. WHEN IS THE LCSC OPEN?

2

3 A. The hours for the LCSC are currently 24 hours a day, 7 days a week.
4 However, the LCSC hours of operation will soon be changed to Monday
5 through Saturday from 7:00 a.m. to 10:00pm Eastern Time. This is
6 different than stated in my direct testimony. . The change being made
7 will establish hours for the LCSC equivalent with BellSouth's own retail
8 hours.

9

10 Q. ON PAGES 17-18 OF HIS TESTIMONY, MR. THOMAS COMPLAINS
11 THAT THE HOURS BELLSOUTH OFFERS LIMIT ITC^DELTACOM'S
12 ABILITY TO CONVERT CUSTOMERS TO ITC^DELTACOM
13 SERVICE. TO SOLVE THIS ALLEGED PROBLEM, MR. THOMAS
14 WOULD LIKE BELLSOUTH TO BE REQUIRED TO PROVIDE "AFTER
15 HOURS ASSISTANCE." PLEASE COMMENT.

16

17 A. BellSouth already provides "after hours assistance" to ALECs. As I
18 stated in my direct testimony, after hours work by the Unbundled
19 Network Element Center ("UNEC") may be arranged on a case-by-case
20 basis for an additional fee. The LCSC's hours extend beyond what
21 ITC^DeltaCom desires. BellSouth views ITC^DeltaCom's desire to
22 change the UNEC hours as simply an attempt to pass its costs onto
23 BellSouth.

24

1 Q. MR. THOMAS, ON PAGE 18 OF HIS TESTIMONY, DESCRIBES THE
2 FUNCTIONALITY WHICH ITC^DELTACOM ALLEGES IS REQUIRED
3 IN A MAINTENANCE AND REPAIR INTERFACE. DO TAFI AND
4 ECTA ALREADY PROVIDE ITC^DELTACOM WITH THE
5 FUNCTIONALITY REQUIRED TO ENABLE ITC^DELTACOM TO
6 KEEP ITS CUSTOMERS INFORMED?
7

8 A. Yes. As I've stated in my direct testimony, BellSouth provides
9 ITC^DeltaCom with non-discriminatory access to its maintenance and
10 repair OSS by providing TAFI and ECTA Gateway. Among other
11 things, these interfaces allow ALECs to enter customer trouble tickets
12 into the BellSouth system, retrieve and track current status on all
13 trouble and repair tickets, and receive an estimated time to repair on a
14 real-time basis.
15

16 Q. MR. THOMAS, ON PAGE 18 OF HIS TESTIMONY, STATES THAT
17 ITC^DELTACOM SHOULD BE ABLE "... ENTER A NEW TROUBLE
18 TICKET INTO THE BELLSOUTH MAINTENANCE SYSTEM. . .
19 RETRIEVE A LIST OF ITEMIZED TIME AND MATERIAL CHARGES
20 AT THE TIME OF TICKET CLOSURE. . ." FROM TAFI. PLEASE
21 COMMENT.
22

23 A. Itemized time and material charges are not available in TAFI for
24 BellSouth's own retail units or for ALECs.
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Q. ON PAGE 15 OF HIS TESTIMONY, MR. HYDE STATES THAT
“CURRENTLY BELLSOUTH CANNOT PROCESS 20% TO 25% OF
ITC^DELTACOM’S ORDERS MECHANICALLY”. FURTHERMORE,
MR. THOMAS STATES, ON PAGE 2 OF HIS TESTIMONY, THAT
“UNFORTUNATELY, 20–25% OF THE ORDERS THAT
ITC^DELTACOM CURRENTLY PLACES VIA EDI ARE NOT YET
ACCEPTED BY BELLSOUTH’S ELECTRONIC SYSTEMS”. PLEASE
COMMENT.

A. As I explained in direct testimony in response to ITC^DeltaCom’s Issue
2(g), nondiscriminatory access does not require that all information and
functions for ALECs be entirely electronic and involve no manual
handling. Many services, primarily complex services, involve
substantial manual handling by BellSouth for both ALECs and
BellSouth’s retail customers. Thus, nondiscriminatory access to pre-
ordering, ordering, and provisioning functions for ALECs also
legitimately may involve manual processes.

The specialized and complicated nature of complex services, together
with their relatively low volume of requests relative to basic exchange
services, renders them less suitable for mechanization, whether for
retail or resale applications. Complex variable processes are difficult to
mechanize, and BellSouth has concluded that mechanizing many

1 lower-volume complex retail services would be imprudent for its own
2 retail operations, in that the benefits of mechanization would not justify
3 the cost. Since the same manual processes are in place for both ALEC
4 and BellSouth retail complex service requests, the processes are
5 competitively neutral.

6

7 Q MR. THOMAS STATES, ON PAGE 3 OF HIS TESTIMONY, THAT " OF
8 THE 75-80% OF ITC^DELTA COM'S ORDERS THAT ARE
9 SUBMITTED ELECTRONICALLY, 62% OF THESE ORDERS FALL
10 OUT FOR MANUAL HANDLING BY BELL SOUTH." ON THE OTHER
11 HAND, MR HYDE, ON PAGE 15 OF HIS TESTIMONY, SAYS THAT
12 MORE THAN 50% FALLOUT. PLEASE COMMENT?

13

14 A. EDI is ITC^DeltaCom's chosen electronic ordering interface. In order to
15 enable ALECs to submit some complex LSRs electronically, rather than
16 by fax, BellSouth designed the EDI and TAG ordering interfaces to
17 accept LSRs for four complex services: PBX trunks, Synchronet® (a
18 private line data service), ISDN Basic Rate Service, and hunting. While
19 these services may be ordered electronically via EDI and TAG, the
20 LSRs for these services "fall out" for manual handling. This "fall out"
21 has nothing to do with any supposed inadequacies in BellSouth's
22 systems, but results from the fact that the requested services are
23 complex. After these LSRs are transmitted to BellSouth via EDI, they
24 are handled as if they were faxed LSRs for complex services. All ALEC

1 LSRs for complex services are handled in substantially the same time
2 and manner as service requests for complex services are handled for
3 BellSouth's retail customers. I discussed the manual handling of ALEC
4 and BellSouth service requests in my direct testimony in response to
5 ITC^DeltaCom's Issue 2(g).

6

7 Q. DO YOU AGREE WITH MR HYDE'S ASSESSMENT THAT MORE
8 THAN 50% OF ITC^DELTACOM'S ORDERS SUBMITTED
9 ELECTRONICALLY FALL OUT FOR MANUAL HANDLING?

10

11 A. Yes. I have reviewed ITC^DeltaCom's flow-through data for the last 9
12 months and in excess of 50% of the services ordered electronically by
13 ITC^DeltaCom fall out for manual handling by design. BellSouth is
14 pleased to know that ITC^DeltaCom has discovered the expedience of
15 ordering these complex services via EDI rather than fax.

16

17 Q. IN YOUR DIRECT TESTIMONY, YOU DISCUSSED "ORDER FLOW
18 THROUGH" AND THE METHODS USED BY BELLSOUTH TO
19 CALCULATE AND REPORT FLOW THROUGH. HAVE YOU
20 EVALUATED ITC^DELTACOM'S USE OF THE ELECTRONIC
21 INTERFACES BASED ON THE DATA CONTAINED IN THE PERCENT
22 FLOW THROUGH SERVICE REQUESTS REPORT?

23

24 A. Yes. To better understand ITC^DeltaCom's use of electronic interfaces,

1 a comparative analysis of its individual data with the ALEC aggregate
2 was conducted using the July 1999 Flow Through Report. The results
3 are as follows:

	Fatal Reject Rate	Auto Clarification & ALEC Error Rate	Manual Fallout Rate
ITC^DeltaCom	3.8%	40.8%	66.6%
ALEC Aggregate	0.5%	10.8%	6.9%

4
5
6 Further, an examination of the flow through data for the nine month
7 period November 1998 through July 1999 shows that ITC^DeltaCom
8 had electronically submitted 9,522 LSRs. From these submissions, 545
9 (5.7%) were immediately rejected due to fatal errors on the part of
10 ITC^DeltaCom. From the remaining Total Mechanized LSRs of 8,432
11 (8,977 – 545), 5,159 (61.2%) fell out by design for manual processing.
12 This “fall out by design” is the direct result of the products and services
13 ITC^DeltaCom has decided to market to its end users, specifically
14 complex services and hunting to business end user customers. In
15 addition, of the LSRs remaining after consideration for those which fell
16 out for manual processing, ITC^DeltaCom experienced an auto
17 clarification and ALEC error rate of approximately 40% during this same
18 nine month period.

19
20 From this one can conclude that:

- 1 1) ITC^DeltaCom has difficulty submitting complete and accurate
2 LSRs due to the high fatal reject rate and auto clarification and
3 ALEC error rate; and
4 2) ITC^DeltaCom's market plan drives a high manual fallout rate which
5 is not representative of the ALEC community as a whole.

6
7 Q. ON PAGES 6-7 OF HIS TESTIMONY, MR. THOMAS STATES THAT
8 "THE COMMISSION SHOULD REQUIRE BELL SOUTH TO PROVIDE
9 ITC^DELTACOM WITH THE MSAG AND SUBSEQUENT UPDATES
10 ON A DAILY BASIS". IS THIS MATTER AN ISSUE IN
11 ITC^DELTACOM'S ARBITRATION PETITION?

12
13 A. No. This matter was raised for the first time in Mr. Thomas' testimony.
14 This request is not contained in ITC^DeltaCom's Petition for Arbitration,
15 as an issue in dispute and BellSouth has not seen this subject
16 addressed previously. Specifically, ITC^DeltaCom's Arbitration Petition
17 did not include the issue of the Master Street Address Guide ("MSAG")
18 and subsequent updates. This matter, therefore, is not an issue subject
19 to this arbitration. However, I will explain what the MSAG is and the
20 manner in which BellSouth provides it and its updates to ALECs,
21 including ITC^DeltaCom.

22
23 Q. WHAT IS MSAG?

24

1 A. MSAG is the portion of the E911 database, which contains the street
2 address and the selective routing feature, also known as ESN.

3

4 Q. WHO IS RESPONSIBLE FOR THE MSAG?

5

6 A. It is the responsibility of the E911 Customer to assign, maintain and
7 resolve discrepancies in MSAG data for their serving area. The E911
8 Customer is defined as the Governmental Agency responsible for
9 providing public safety. The E911 Customer is also responsible for
10 providing new address information and changes to SCC
11 Communications Corp. for updates to the MSAG. SCC
12 Communications Corp. is the 911 Vendor contracted by BellSouth to
13 maintain the MSAG.

14

15 Q. IS ITC^DELTACOM CURRENTLY PROVIDED THE MSAG AND
16 SUBSEQUENT UPDATES?

17

18 A. Yes. ITC^DeltaCom is currently provided MSAG updates on a quarterly
19 basis for the territories in which it provides end user service.

20

21 Q. ON PAGE 2 OF HIS TESTIMONY, MR THOMAS COMPLAINS THAT
22 EDI DOES NOT ALLOW AN INTERCEPT MESSAGE TO BE PLACED
23 ON THE SAME LSR AS THE REQUEST FOR THE LOOP. DO YOU
24 AGREE?

1

2 A. Yes. When the ALEC submits an LSR for a loop via EDI or TAG, with
3 the telephone number assigned from an NPA/NXX owned by the ALEC,
4 a request for a reference of calls (intercept message) can not be placed
5 on the same LSR.

6

7 Q. IF THE ALEC WANTS TO ADD A REFERENCE OF CALLS ON A LSR,
8 WHEN SHOULD THE ALEC SUBMIT THE LSR FOR THE
9 REFERENCE OF CALLS?

10

11 A. The ALEC has two options. A subsequent LSR may be submitted via
12 EDI or TAG for the reference of calls, or the ALEC can submit the LSR
13 manually.

14

15 Q. ARE CHANGES BEING MADE TO ALLOW THE LOOP AND
16 INTERCEPT TO BE PLACED ON THE SAME ELECTRONICALLY
17 SUBMITTED LSR?

18

19 A. Yes. The situation is being addressed in Release 6.0.

20

21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

22

23 A. Yes.