1 BELLSOUTH TELECOMMUNICATIONS, INC.

2 REBUTTAL TESTIMONY OF RONALD M. PATE

3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4 DOCKET NO. 991838-TP

5 FEBRUARY 14, 2000

6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH

8 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

10 A. My name is Ronald M. Pate. I am employed by BellSouth

11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection

12 Services. In this position, I handle certain issues related to local

13 interconnection matters, primarily operations support systems ("OSS").

14 My business address is 675 West Peachtree Street, Atlanta, Georgia

15 30375.

16

17 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

18

19 A. Yes. I filed direct testimony on January 25, 2000.

20

21 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

22

23 A. The purpose of my testimony is to rebut the direct testimony of BlueStar

24 Networks, Inc ("BlueStar"): Ms. Carty Hassett and Mr. Michael Starkey.

1 Specifically, my comments respond to their direct testimony regarding

2 Issue Nos. 6 and 7.

3

4 ***Issue 6: For xDSL orders, should BellSouth be required to provide***

5 ***real time access to the following, and if so, when?***

6 ***a) OSS for loop makeup information qualification;***

7 ***b) Preordering;***

8 ***c) Provisioning;***

9 ***d) Repair/maintenance, and***

10 ***e) Billing***

11

12 Q. ON PAGES 3 OF HER TESTIMONY, MS HASSETT STATES THAT

13 "IN ORDER TO PROVISION xDSL BASED SERVICE, WE NEED

14 ACCESS TO INFORMATION ABOUT BELLSOUTH'S LOOPS.

15 BELLSOUTH ALREADY HAS THE INFORMATION WE NEED, AND IT

16 USES THIS INFORMATION FOR ITS OWN PURPOSES." PLEASE

17 COMMENT.

18

19 Q. BellSouth is developing procedures to provide Alternate Local

20 Exchange Carriers ("ALECs") detailed loop qualification information via

21 the Service Inquiry ("SI") process. This process will be in strict

22 compliance and implemented within the timeframe provided in the

23 Federal Communication Commission's ("FCC") Third Report and Order

24 and Fourth Further Notice of Proposed Rulemaking ("UNE Remand

25 Order") in CC Docket No. 96-98 and released on November 5, 1999.

1

2   In addition to the requirements set forth by the FCC's UNE Remand

3   Order, BellSouth is developing an electronic interface for ALECs to its

4   Loop Facility Assignment Control System ("LFACS"). BellSouth has a

5   targeted date of third quarter 2000 for implementation.

6

7   Q.   WHAT IS LFACS?

8

9   A.   LFACS is an internal BellSouth system supporting the provisioning

10   functionality for service requests. LFACS inventories, maintains and

11   assigns outside plant loop facilities. Examples of the plant loop facility

12   information which may appear in LFACS are: cable identification, the

13   unit of length which applies to the loop (i.e. kilofeet), thickness (or

14   gauge) of the loop, length of loop, associated gauge length of bridge

15   tap, type/number/length of load coils, etc.

16

17   LFACS does not contain the loop qualification information for all loop

18   plant facilities. However, as valid loop make-up is determined, the loop

19   qualification information is input in LFACS.

20

21   Q.   MS HASSETT STATES ON PAGES 3 & 5 OF HER TESTIMONY THAT

22   BLUESTAR NEEDS TO KNOW WHETHER THE LOOP IS ISDN

23   CAPABLE. PLEASE COMMENT.

24

1 A.   In paragraph 427 of its UNE Remand Order, the FCC states that "an

2   incumbent LEC must provide the requesting carrier with

3   nondiscriminatory access to the same detailed information about the

4   loop that is available to the incumbent, so that the requesting carrier

5   can make an independent judgment about whether the loop is capable

6   of supporting the advanced services equipment the requesting carrier

7   intends to install."

8

9   The FCC UNE Remand Order requires that the incumbent LEC provide

10   the ALEC sufficient information concerning the characteristics of the

11   loop, such as the length of the loop, gauge of the loop, presence of

12   bridge tap, etc., to allow the ALEC to make the appropriate decision

13   concerning the type of service that best meets its customers needs.

14   Ms Hassett appears, however, to take the position that BellSouth must

15   make this decision for BlueStar. As I discussed in my direct testimony,

16   it is not reasonable to expect BellSouth to make such determinations on

17   behalf of BlueStar with regard to local service request submissions,

18   particularly when such decisions would impact the final services

19   rendered to the ALEC's end users.

20

21 Q.   MS HASSETT STATES ON PAGE 6 OF HER TESTIMONY THAT "IF

22   WE HAD DIRECT COMPUTER ACCESS TO THE INFORMATION

23   FROM THE BEGINNING, WE COULD DETERMINE QUALIFICATION

24   ISSUES FOR OURSELVES". PLEASE COMMENT.

25

1 A. BellSouth does not understand the position taken in Ms Hassett's

2 testimony. BlueStar does not currently utilize an electronic interface for

3 submission of its unbundled loop service requests. BlueStar currently

4 submits its requests to BellSouth manually. Therefore, it appears that

5 BlueStar will not be in a position to utilize the electronic access to loop

6 qualification information when it is available. I am perplexed concerning

7 how BlueStar could receive "computer access" to this information when

8 BlueStar does not have the electronic interfaces in place that will be

9 required to obtain this information electronically.

10

11 Q. DOES THE FCC REQUIRE THAT ACCESS TO LOOP

12 QUALIFICATION INFORMATION BE PROVIDED ONLY VIA DIRECT

13 COMPUTER ACCESS?

14

15 Q. No. The FCC clarified in paragraph 427 of its UNE Remand Order that

16 "pursuant to our existing rules, an incumbent LEC must provide the

17 requesting carrier with nondiscriminatory access to the same detailed

18 information about the loop that is available to the incumbent".

19 Therefore as pointed out in my direct testimony, BellSouth is required to

20 provide access to loop qualification information in "substantially the

21 same time and manner" as it provides for itself, and to provide access

22 that provides efficient ALECs with a meaningful opportunity to compete.

23

24 As discussed previously even though it is not a requirement of the UNE

1   Remand Order, BellSouth is developing an electronic interface for

2   ALECs to LFACS.

3

4 Q. PLEASE DESCRIBE HOW LOOP QUALIFICATION INFORMATION IS

5   DETERMINED FOR BELLSOUTH SERVICE REQUESTS PLACED

6   FOR ITS TARIFFED ADSL SERVICES.

7

8 Q. BellSouth currently has two ADSL service offerings. BellSouth's tariffed

9   Business Class ADSL service, offered to Internet Service Providers

10   (ISP), ALECs, Interexchange Carriers (IXC) and certain large business

11   customers, provides guaranteed network performance levels and

12   supports loop conditioning.   BellSouth.net FastAccess Service, offered

13   to Network Service Providers (NSP), is a "best effort" offering and does

14   not support any special actions by BellSouth to condition an existing

15   loop.

16

17   The availability of facilities for BellSouth's Business Class Service is

18   determined via a SI process. The SI process for an ALEC unbundled

19   loop order request is handled in substantially the same time and

20   manner as the SI process for BellSouth's Business Class Service.

21

22   The availability of facilities for BellSouth.net FastAccess Service is

23   determined via the Loop Qualification System ("LQS"). As discussed in

24   my direct testimony, LQS is a mechanized loop qualification process for

25   central offices qualified for ADSL services, that indicates whether a loop

1   is qualified or disqualified for ADSL service. LQS does not provide the

2   loop qualification information. It merely provides a qualification

3   determination for BellSouth.net FastAccess (ADSL) Service on a

4   telephone number query basis. To access this mechanized system a

5   carrier must sign a contract with BellSouth as a provider of BellSouth's

6   FastAccess Service.

7

8 Q.   ON PAGES 53-54 OF HIS TESTIMONY, MR STARKEY STATES

9   THAT "BLUESTAR WISHES TO OBTAIN ACCESS TO THE SAME

10   INFORMATION, DATABASES AND FUNCTIONS THAT ARE

11   AVAILABLE TO BELLSOUTH EMPLOYEES WHEN THEY

12   DETERMINE WHETHER A GIVEN LOOP WILL SUPPORT A GIVEN

13   XDSL TECHNOLOGY. THE LINE SHARING ORDER AT

14   PARAGRAPHS 93-109 REQUIRES BELLSOUTH TO PROVIDE

15   EXACTLY THIS INFORMATION." PLEASE COMMENT.

16

17 A.   Mr. Starkey is misguided in his assertion that the FCC, in its Third

18   Report and Order in CC Docket No. 98-147 and Fourth Report and

19   Order in CC Docket No. 96-98 ("Line Sharing Order") and released on

20   December 9, 1999, orders that the incumbent LECs provide ALECs

21   access to the same information, databases and functions that are

22   available to BellSouth employees.

23

24   The Line Sharing Order simply added line sharing as a new UNE. As

25   stated in paragraph 4, the FCC amended "unbundling rules to require

7

1　　incumbent LECS to provide unbundled access to a new network

2　　element, the high frequency portion of the local loop".

3

4　Q.　IS THE LOOP QUALIFICATION ISSUE ADDRESSED IN THE FCC's

5　　LINE SHARING ORDER?

6

7　A.　No.　Mr. Starkey has confused the FCC's Line Sharing Order and the

8　　FCC's UNE Remand Order.　The loop qualification information issue is

9　　not addressed in the Line Sharing Order, but rather, it is addressed in

10　　the UNE Remand Order.　There is no linkage to be made between the

11　　FCC's UNE Remand Order and its Line Sharing Order, as Mr. Starkey

12　　has suggested.

13

14　Q.　ON PAGE 54 OF HIS TESTIMONY, MR STARKEY STATES THAT

15　　"THE LINE SHARING ORDER AT PARAGRAPHS 103 AND 105

16　　NAMES SPECIFIC DATABASES AND SYSTEMS TO WHICH ALECS

17　　MUST, AT A MINIMUM BE GIVEN ACCESS .... (THE FCC

18　　SPECIFICALLY IDENTIFIES THE LOOP FACILITIES AND

19　　ASSIGNMENT CONTROL SYSTEM - LFACS, THE COMPUTER

20　　SYSTEM FOR MAINFRAME OPERATIONS - COSMSO, AND

21　　SWITCH)." PLEASE COMMENT.

22

23　A.　As I have stated above, Mr. Starkey has confused the FCC's Line

24　　Sharing Order and the FCC's UNE Remand Order.　The loop

1 qualification information issue is not addressed in the Line Sharing

2 Order.

3

4 In paragraph 103 of its Line Sharing Order, the FCC states that "the

5 capabilities already exist in the LFACS to inventory and assign two

6 services on one loop." In paragraph 105, the FCC simply states that

7 "the incumbent LEC's OSS such as COSMOS and SWITCH can be

8 used to track these connections". There is no requirement in either of

9 these paragraphs that obligate the incumbent LECS to provide the

10 ALECS access to any databases and/or systems.

11

12 Q. DOES COSMOS AND SWITCH CONTAIN LOOP QUALIFICATION

13   INFORMATION?

14

15 A. No. COSMOS is another internal BellSouth system supporting

16   provisioning functionality. COSMOS inventories information regarding

17   customer facilities. The system assigns and manages central office line

18   equipment and other miscellaneous central office equipment, such as

19   frame tie pairs, bridging equipment, etc. COSMOS does not contain

20   the loop qualification information.

21

22 Q. ON PAGE 9 OF HER TESTIMONY, MS HASSETT STATES

23   "BELLSOUTH HAS OFFERED ELECTRONIC BONDING FOR

24   ORDERING, PREORDERING, BILLING, AND REPAIR FOR ALL

25   UNES BY MARCH. PLEASE COMMENT.

1

2   A.   BellSouth is unclear as to Ms Hassett's definition of electronic bonding.

3   BellSouth has never represented that it will offer an electronic interface

4   for pre-ordering, ordering, billing, and repair for *all* UNEs by March

5   2000.

6

7   *Issue 7: Should the interconnection agreement include a time*

8   *interval for BellSouth provisioning of xDSL loops and UCLs?*

9

10 Q.   IS BELLSOUTH FILING AN UPDATED VERSION OF ITS

11   BELLSOUTH PRODUCTS & SERVICES INTERVAL GUIDE

12   ("INTERVAL GUIDE") FOR INTERCONNECTION SERVICES? .

13

14 A.   Yes. The interval guide was updated with a new issue 2B, in January

15   2000. Carrier Notification Letter SN91081622 was posted to the

16   BellSouth web site on December 21, 1999 announcing the updated

17   version of the interval guide. The updated interval guide is available on

18   BellSouth's website at:

19   "http://www.interconnection.bellsouth.com/guides/intl_i2a/indexf.htm".

20

21   I am attaching Chapter 4.0 of the updated interval guide as Rebuttal

22   Exhibit RMP-3. This chapter sets forth in table format the provisioning

23   interval for all UNES, including those for ADSL and HDSL loops. The

24   guide also contains an important footnote that reads as follows:

25

1   1. * = Service inquiry required. Service Inquiry interval included

2   in Targeted Service Interval and FOC Interval.

3

4   The interval guide footnote referred in my direct testimony has been

5   removed.

6

7 Q.   ON PAGE 5 OF HER TESTIMONY, MS HASSETT STATES THAT

8   "BELLSOUTH WANTS BLUESTAR TO GO THROUGH A PRE-

9   QUALIFICATION AND QUALIFICATION PROCESS THAT

10   CURRENTLY TAKES UP TO 15 DAYS AND COSTS OVER $500.

11   TO WHAT COST AND INTERVAL IS BLUESTAR REFERRING?

12

13 A.   First, BellSouth is not sure which specific functions Ms Hassett refers to

14   as the pre-qualification and qualification process. BellSouth can only

15   speculate that Ms Hassett is referring to the time from receipt of the

16   initial request until completion of the order.

17

18   Secondly, Ms Hassett appears to suggest that BellSouth utilizes a

19   standard $500 cost and a standard 15 day interval for this process.

20

21   BellSouth can affirm there is not a standard $500 cost. However since

22   BellSouth does not understand to which cost BlueStar is referring, it can

23   not address this at this time. If BlueStar will provide additional

24   information, BellSouth will respond accordingly.

25

1

2   Q.   WHAT IS THE TARGETED INTERVALS FOR THE PROVISIONING

3   OF UNBUNLDED LOOPS?

4

5   A.   As I discussed in my direct testimony, BellSouth assigns targeted

6   intervals for the provisioning of services based on the complexity of the

7   services requested. BellSouth suspects that Ms Hassett is referring to

8   the targeted service interval for a quantity of 6 - 13 unbundled loops in

9   her testimony because it aligns with the targeted service interval posted

10   in the Interval Guide.

11

12   I will clarify the targeted service intervals for these types of loops.

13   The same service intervals apply to unbundled copper loops, ADSL

14   compatible unbundled loops and HDSL compatible unbundled loops.

15

16   For a quantity of **1-5** loops the targeted service interval is **12** days which

17   includes a FOC interval of **7** days.

18

19   For a quantity of **6-13** loops the targeted service interval is **15** days

20   which includes a FOC interval of **8** days.

21

22   For a quantity of **14+** loops the targeted service interval is **negotiated**

23   and the FOC interval is **negotiated**.

24

25

12

1 Q. ON PAGE 8 OF HER TESTIMONY, MS HASSETT STATES THAT

2   "BELLSOUTH MISSES THE FIRM ORDER COMMITMENT (FOC) ON

3   20% OF OUR ORDERS." PLEASE COMMENT.

4

5 A. BellSouth is unclear as to Ms Hassett's definition of firm order

6   commitment. BellSouth can only speculate that Ms Hassett is referring

7   to the committed due date returned to BlueStar on the Firm Order

8   *Confirmation* ("FOC").

9

10   Ms Hassett makes judgmental comments as to the performance of

11   BellSouth without providing any specific supporting data or any basis of

12   how the results were calculated. It is a noted fact that neither Ms

13   Hassett nor any other employee of BlueStar has accessed performance

14   data specific to BlueStar provided by BellSouth. Such ALEC specific

15   performance data is provided monthly via BellSouth's Performance

16   Measurements Analysis Platform ("PMAP").

17

18 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

19

20 A. Yes.

Transmittal Cover Sheet for Pate Rebuttal Exhibit RMP-3

This sheet transmits Chapter 4 of

BellSouth's Product & Services Interval Guide

which consists of 6 numbered pages.

4.1 Unbundled Network Elements

The Unbundled Network Elements Interval Table consists of the following Terms and Definitions:

Term	Definition
Product	BellSouth Product
Quantity	Number of lines, trunks, circuits, or points
Targeted Service Interval	The number of days from receipt of request to completion of order
FOC Interval	The number of days from receipt of request to Firm Order Confirmation (FOC)

UNE Interval Table

Product	Quantity	Targeted Service Interval	FOC Interval
Unbundled Loops			
2 Wire analog voice grade loopnon-designed (SL1)	1-5	7 days	2 days
	6-14	10 days	3 days
	15+	Negotiated	Negotiated
2 Wire analog voice grade loop designed (SL2)	1-5	7 days	2 days
	6-14	10 days	3 days
	15+	Negotiated	Negotiated
4 Wire analog voice grade loop	1-5	7 days	2 days
	6-14	10 days	3 days
	15+	Negotiated	Negotiated
4 Wire DS1 & PRI digital loop	1-5	7 days	2 days
	6-14	10 days	3 days
	15+	Negotiated	Negotiated
2 Wire ISDN digital loop	1-5	7 days	2 days
	6-14	10 days	2 days
	15+	Negotiated	Negotiated
4 Wire 56 OR 64 Kbps digital loop	1-5	7 days	2 days
	6-14	10 days	3 days

	15+	Negotiated	Negotiated
ADSL-2 Wire asymmetrical digital subscriber line loop*	1-5	12 days	7 days
	6-13	15 days	8 days
	14+	Negotiated	Negotiated
HDSL-2 Wire& 4 Wire high bit rate digital subscriber line loop*	1-5	12 days	7 days
	6-13	15 days	8 days
	14+	Negotiated	Negotiated
Unbundled CopperLoop*	1-5	12 days	7 days
	6-13	15 days	8 days
	14+	Negotiated	Negotiated
Unbundled Network Terminating Wire*		Negotiated	Negotiated
LoopConcentration (inside plant)			
Unbundled Loop Concentration (ULC) System*	1	95 days	20 days
ULC Loop Interfaces*	1	12 days	7 days
Sub Loops (outside plant)			
Unbundled Sub-loop Distribution*	1	Negotiated	Negotiated
Unbundled Sub-loop Concentration *(dependent upon equipment and right of way (Note3)	1	Negotiated	Negotiated
Network Interface Device (NID)			
NID to NID cross connect	1-14	7 days	2 days
	15+	Negotiated	Negotiated
NID	1-14	7 days	2 days
	15+	Negotiated	Negotiated
Open AIN (OAIN)			
OAIN tool kit*	1	45 days	10 days
OAIN service management system*	1	45 days	10 days
CCS7 Signaling Transport Service			
A-Link signaling	1	60 days	12 days
D-Link signaling	1	60 days	12 days
STP-signaling transfer point	1	60 days	12 days
Interoffice Transport			
Dedicated voice grade (Note 3)	1	30 days	7 days

Dedicated interoffice DSO (Note3)	1	30 days	7 days
Dedicated interoffice DS1	1	30 days	7 days
Dedicated interoffice DS3*	1	37 days	14 days
Dedicated interoffice 2 wire voice grade (Note 3)	1	30 days	7 days
Dedicated interoffice 4 wire voice grade (Note 3)	1	30 days	7 days
Dedicated local channel DS1	1	30 days	7 days
Dedicated local channel DS3*	1	37 days	14 days
Dark fiber	1	Negotiated	Negotiated
O/S and D/A UNEs			
Operator call processing-OPCH, FACH, BLV, EI,ECT	1	30 days	7 days
Operator call processing- facility based OPCH, FACH, ECT	1	30 days	7 days
Operator call processing-facility based BLV, EI	1	30 days	7 days
Inward operator services	1	30 days	7 days
Directory assistanceaccess service (DAAS)	1	30 days	7 days
Directory assistancecall completion (DACC)	1	30 days	7 days
Directory assistancenumber services intercept (DANSI)	1	30 days	7 days
Directoryassistance transport	1	30 days	7 days
Directory assistancedatabase service (DADS)	1	30 days	7 days
Direct access toDA service (DADAS)	1	30 days	7 days
Customized Call Routing (selective routing-LCC)			
1-5 LCC	1-5	30 days	7 days
6-25LCC	6-25	60 days	15 days
25 LCC	25+	Negotiated	Negotiated
Unbundled Local Switching			
2 Wire analog line port	1-10	3 days	2 days
	11-25	4 days	2 days
	25+	Negotiated	Negotiated
2 Wire analog DID trunk port	1-10	5 days	2 days
	11-25	6 days	2 days
	25+	Negotiated	Negotiated
2 Wire ISDN digital line side port	1-10	5 days	2 days
	11-25	6 days	2 days
	25+	Negotiated	Negotiated
4 Wire ISDN DS1 digital trunk port	1-10	5 days	2 days
	11-25	6 days	2 days
	25+	Negotiated	Negotiated

UnbundledAccess to OSS			
Preorder*	1	30 days	N/A
Order/ Provisioning*	1	30 days	N/A
Maintenance/ Repair*	1	30 days	N/A
Access to Databases			
800 database	1	10 days	3 days
Line information database (LIDB)	1	60 days	7 days
Physical Collocation			
Application Accepted or Denied		10 Business days	N/A
Application Response	1-5	30 Business days	N/A
	6-10	36Business days	N/A
	11-14	42 Business days	N/A
	15+	Negotiated project	N/A
Ordinary provisioning	1-5	90 Businessdays (Florida 90 Calendar days)	N/A
	6+	Negotiatedproject	N/A
Extraordinary provisioning	1-5	130 Business days	N/A
	6+	Negotiated project	N/A
Virtual Collocation			
Application Accepted or Denied		10 Business days	N/A
Application	1-5	20 Business days	NA
	6-10	26 days	NA
	11-14	32 days	
	15+	Negotiated project	
Ordinary provisioning	1-5	50 Business days (Florida 60 Calendar days)	NA
	6+	Negotiated project	NA
Extraordinary provisioning	1-5	75 Business days	NA
	6+	Negotiated project	NA

Note:

1. *=Service Inquiry required. Service Inquiry interval included in Targeted Service Interval and FOC Interval
2. NA=Not applicable
3. Product under development

4. Negotiated=The BellSouth Project Manager will negotiate with the NewService Provider, for all targeted intervals