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March 1, 2000

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 991237-TP

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of W. Keith Milner and Jerry Hendrix, Ike Byrd, and David P. Scollard which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Lisa S. Foshee
(Ba)

Lisa S. Foshee

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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AFA
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WAW
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Byrd
Scollard
DOCUMENT NUMBER - DATE
02776 MAR -18
02777 MAR -18
02778 MAR -18
FPSC-RECORDS/REPORTING

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FPSC-BUREAU OF RECORDS

Milner
DOCUMENT NUMBER - DATE
02776 MAR -18
FPSC-RECORDS/REPORTING

Hendrix
DOCUMENT NUMBER - DATE
02777 MAR -18
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**CERTIFICATE OF SERVICE
Docket No. 991237-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 1st day of March, 2000 to the following:

Diana Caldwell
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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AT&T Communications of the
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Lisa S. Foshee (fw)

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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 991237-TP
MARCH 1, 2000

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

A. My name is W. Keith Milner. My business address is 675 West Peachtree
Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection
Services for BellSouth Telecommunications, Inc. ("BellSouth").

Q. ARE YOU THE SAME W. KEITH MILNER THAT FILED DIRECT
TESTIMONY IN THIS PROCEEDING ON JANUARY 31, 2000?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
TODAY?

A. In my testimony, I will provide rebuttal to the testimony of AT&T witness
Langin-Hooper regarding the way in which various calls are processed
and the equipment components used during such processing.

1 Q. ON PAGE 5 OF HIS TESTIMONY REGARDING CALL FORWARDING,
2 MR. LANGIN-HOOPER STATES "THE COMMON LINE CONNECTING
3 BELLSOUTH'S CENTRAL OFFICE TO THE CUSTOMER PREMISES OF
4 THE INITIALLY CALLED NUMBER IS NOT USED IN THE COMPLETION
5 OF THE CALL." DO YOU AGREE?
6

7 A. Yes. However, the more appropriate question is whether or not a
8 common line is involved in the completion of a call forwarded call. The
9 answer to this more relevant question is yes, the majority of calls
10 forwarded to and from customers subscribing to call forwarding service
11 does involve the use of an end user customer's common line within the
12 LATA and CCL charges are appropriate.
13

14 Q. BEGINNING ON PAGE 5 OF HIS TESTIMONY, MR. LANGIN-HOOPER
15 STATES THAT ONE OF THE TWO CALLS IS ALWAYS ON HOLD AT
16 THE BELLSOUTH CENTRAL OFFICE IN THE CALL WAITING
17 SITUATION. DO YOU AGREE?
18

19 A. No. Where Mr. Langin-Hooper is not technically correct is that from the
20 second caller's perspective, the call is not on hold while the caller hears a
21 ringing tone, awaiting the customer subscribing to the call waiting feature
22 to answer. Ringing tone is ended when the called party answers the
23 second call by depressing the switch hook or when the call is forwarded to
24 another telephone number or when the caller hangs up without the call
25 having been answered. This distinction is important in understanding the

1 parts of the switch used during this phase of the call. The switch does not
2 "intercept" an in-bound call to the customer subscribing to the call waiting
3 feature. Instead, it is the customer subscribing to the call waiting feature
4 that controls when or if a call waiting connection will be initiated. In this
5 sense, there is nothing for the switch serving the customer subscribing to
6 the call waiting feature to intercept.

7

8 Q. ON PAGE 7 OF HIS TESTIMONY, MR. LANGIN-HOOPER STATES
9 "THE 3W SERVICE [THAT IS, THE THREE WAY CALLING SERVICE]
10 'INTERCEPTS' THE CUSTOMER'S CALLS AT THE CENTRAL OFFICE,
11 PROVIDING A CONFERENCE FUNCTION." DO YOU AGREE WITH
12 THIS CHARACTERIZATION OF HOW THE THREE WAY CALLING
13 FEATURE IS INVOKED?

14

15 A. No. The switch does not "intercept" an in-bound call to the customer
16 subscribing to the three way calling feature. Instead, it is the customer
17 subscribing to the three way calling feature, which is an outbound calling
18 scenario, that controls when or if a three way connection will be initiated.
19 In this sense, there is nothing for the switch serving the customer
20 subscribing to the three way calling feature to intercept.

21

22 Q. BEGINNING ON PAGE 7 OF HIS TESTIMONY, MR. LANGIN-HOOPER
23 DESCRIBES THE NETWORK CONFIGURATION AND OPERATION OF
24 FOREIGN EXCHANGE (FX) SERVICE. DO YOU AGREE WITH HIS
25 DESCRIPTION?

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A. I agree with Mr. Langin-Hooper’s description to a point. On page 9 of his testimony, Mr. Langin-Hooper refers to Exhibit JLH-3: Chart 4 to demonstrate an AT&T long distance call connecting to a FX connection in a BellSouth end office. However, the exhibit depicts a FX configuration that, while technically correct, represents only a minor portion of the total use of FX service by end user customers.

The primary use of FX service is for end user customers to obtain telephone service from a telephone exchange other than their local exchange office, thus the name “foreign exchange”. This gives the foreign exchange service customer a “local presence” in that “foreign exchange” area allowing the foreign exchange service customer to make calls to or receive calls from end user customers in that foreign exchange area without having to pay for a toll call. Therefore, the majority of calls placed over interLATA and intraLATA FX services are to or from end user customers in that FX area and do not involve an AT&T long distance call as shown on Exhibit JLH-3: Chart 4. Therefore, the majority of calls placed to and from customers subscribing to interLATA and intraLATA FX service do involve the use of an end user customer’s common line and CCL charges are therefore appropriate.

Additionally, in FCC 98-321 (Memorandum Opinion and Order, ¶81), the FCC ruled that CCL charges are appropriate for interstate calls originated from or terminated to local exchange companies’ intraLATA FX service

1 such as BellSouth's A9 Tariff FX Service.

2

3 Q. WHAT IS YOUR UNDERSTANDING OF AT&T'S POSITION ON HOW
4 CCL CHARGES SHOULD BE ASSESSED TO THE CALL
5 ARRANGEMENTS, SUCH AS CALL WAITING AND THREE WAY
6 CALLING, CITED IN THIS DOCKET?

7

8 A. It is my understanding that AT&T believes CCL charges should be
9 assessed based upon a separate analysis of each and every call and
10 each access minute of use involved in that call. Additionally, it is AT&T's
11 position that such charges should be assessed only when a common line
12 facility is being actively utilized for the particular minute of use involved;
13 and that such charges should be assessed one time where two calls
14 simultaneously use the same facility.

15

16 Q. DOES BELLSOUTH PRESENTLY HAVE AUTOMATIC MESSAGE
17 ACCOUNTING (AMA) CAPABILITIES TO MEASURE AND RECORD
18 START AND STOP TIMES ASSOCIATED WITH CALL WAITING AND
19 THREE WAY CALLING FEATURES THAT AT&T ADVOCATES?

20

21 A. No, BellSouth's switches at present do not possess such a capability.
22 Further, BellSouth's position on the application of the CCL charge, as
23 stated in Mr. Hendrix's direct testimony, is supported by the Commission's
24 Orders in Docket No. 820537-TP, Order No. 12765, and Order No. 14452,
25 in that CCL charges are to be assessed for each and every intrastate

1 originating and terminating switched access minute of use, without regard
2 to the identifiable use of a specific common line facility. Thus, there is no
3 need for BellSouth to have (or implement) such a recording feature.

4

5 Q. COULD BELLSOUTH DEVELOP SUCH A FEATURE?

6

7 A. Not without switch vendor participation to develop the feature and
8 associated software, all at substantial expense. Because BellSouth
9 utilizes the switches manufactured by several different vendors,
10 participation by several vendors would be required.

11

12 Q. HOW LONG WOULD IT TAKE TO DEVELOP SUCH A FEATURE?

13

14 A. I do not know. This would depend on the complexity of the software
15 solution, each vendor's commitment to such a development, and the
16 availability of vendors' resources to develop and implement such a
17 capability. I envision that development and implementation of such a
18 feature could take a minimum of a year or more.

19

20 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

21

22 A. Yes.