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April 20, 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. 991534-TP (Intermedia)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Jerry D. Hendrix and Keith Milner, which we ask that you file in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

Sincerely,

E. Earl Edenfield Jr.

E. Earl Edenfield, Jr. (Pd)

Enclosures

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

- AFA _____
- APP _____
- CAF _____
- CMU *Favors* _____
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- SEC *1* _____
- WAW _____
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Hendrix
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CERTIFICATE OF SERVICE
Docket No. 991534-TP

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

(*) Hand Delivery and (+) Federal Express this 21st day of April, 2000 to the following:

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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 991534-TP
APRIL 21, 2000

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

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. I have served in my present role since February 1996, and have been involved with the management of certain issues related to local interconnection, resale, and unbundling.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 29 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations (including research and development) in both the domestic and

1 international arenas.

2

3 I graduated from Fayetteville Technical Institute in Fayetteville, North
4 Carolina, in 1970, with an Associate of Applied Science in Business
5 Administration degree. I later graduated from Georgia State University in
6 1992 with a Master of Business Administration degree.

7

8 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
9 SERVICE COMMISSION, AND IF SO, BRIEFLY DESCRIBE THE
10 SUBJECT OF YOUR TESTIMONY?

11

12 A. I have previously testified before the state public service commissions in
13 Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and South
14 Carolina, the Tennessee Regulatory Authority, and the Utilities
15 Commission in North Carolina on the issues of technical capabilities of the
16 switching and facilities network regarding the introduction of new service
17 offerings, expanded calling areas, unbundling, and network
18 interconnection.

19

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

22

23 A. In my testimony, I will address the technical aspects of certain network-
24 related issues raised in the complaint filed against BellSouth by Intermedia
25 Communications, Inc. ("Intermedia"). Specifically, I will rebut a number of

1 network-related issues addressed in the direct testimony of Intermedia
2 witness Edward L. Thomas.

3
4 Q. THROUGH OUT MR. THOMAS'S TESTIMONY, HE REFERS TO
5 MULTIPLE TANDEM ACCESS ("MTA"). PLEASE PROVIDE A
6 DESCRIPTION OF MTA?

7
8 A. BellSouth Multiple Tandem Access ("MTA") is one form of interconnection
9 available to Intermedia. The MTA option provides for LATA wide transport
10 and termination of a facility based Alternative Local Exchange Carrier's
11 ("ALEC's") originated IntraLATA toll traffic and local traffic. Such traffic is
12 transported by BellSouth on behalf of the ALEC. The ALEC establishes a
13 Point of Interconnection ("POI") at a single BellSouth access tandem with
14 BellSouth providing additional transport and routing through other
15 BellSouth access tandems in that same LATA as required. The facility-
16 based ALEC must establish Points of Interconnection at each BellSouth
17 access tandem where the facility-based ALEC's NXX'S are "homed". If
18 the facility-based ALEC does not have NXX'S homed at a given BellSouth
19 access tandem within a LATA and elects not to establish Points of
20 Interconnection at such a BellSouth access tandem, the facility-based
21 ALEC can instead order MTA in each BellSouth access tandem within the
22 LATA where the ALEC does have a Point of Interconnection and
23 BellSouth shall terminate traffic to end-users served through those
24 BellSouth access tandems where the facility-based ALEC does not have a
25 Point of Interconnection.

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MTA does not provide for handling switched access traffic that transits the BellSouth network to an Interexchange Carrier ("IXC"). Switched access traffic shall be delivered to and from IXCs based on the facility-based ALEC's NPA/NXX code access tandem homing arrangement as specified by the facility-based ALEC in the national Local Exchange Routing Guide ("LERG"). For facility-based ALEC 's originated local traffic and intraLATA toll traffic that BellSouth transports but is destined for termination by a third party network (transit traffic), MTA is available if the use of multiple BellSouth access tandems is necessary to deliver the call to the third party network.

Q. BEGINNING AT THE BOTTOM OF PAGE 3 OF HIS TESTIMONY, MR. THOMAS IMPLIES THAT "THERE IS NO IMMEDIATE RECOURSE" IF INTERMEDIA ENCOUNTERS TRAFFIC BLOCKAGE. PLEASE RESPOND.

A. I disagree. The prevention or minimization of traffic blockages to acceptable levels is a mutual responsibility of both BellSouth and any ALEC who wishes to interconnect with BellSouth. Both parties bear a responsibility to accurately forecast traffic and then to engineer and install appropriate quantities of interconnection trunks. The parties are also free to implement measures such as alternate routing to minimize any adverse effects of trunk blockages.

1 Q. WHAT IS BELLSOUTH'S PERFORMANCE IN PROVIDING
2 INTERCONNECTION TRUNKING AT ACCEPTABLE LEVELS?

3
4 A. For the months of January and February 2000 in Florida, ALECs had only
5 1.7% of their terminating interconnection trunk groups exceeding the 3%
6 blocking standard. By comparison, 1.9% and 1.6% of BellSouth's
7 terminating interoffice trunk groups experienced blocking above 3%.
8 Clearly, BellSouth is treating ALECs' traffic at least as effectively as it
9 treats its own traffic.

10

11 Q. ON PAGE 4 OF HIS TESTIMONY, MR. THOMAS STATES "...CALLS
12 TRANSPORTED OVER MTA ARCHITECTURES ARE SWITCHED MANY
13 MORE TIMES THAN IF THEY WERE TO BE TRANSPORTED OVER
14 DIRECT TRUNKS TO THE CALLED PARTY'S END OFFICE." IS HE
15 CORRECT?

16

17 A. No. With MTA, when an ALEC sends a call to a BellSouth Access
18 Tandem that is destined for an end user customer served by an office
19 subtending another BellSouth Access Tandem, only one additional
20 switching function is required. That, obviously, is not "many more times".
21 In many cases, however, BellSouth access tandems have trunk groups to
22 all BellSouth end offices within the local calling area. In those cases there
23 would be no more switching functions than if the ALEC interconnected to
24 the BellSouth access tandem that the BellSouth end office homes on. If a
25 call is destined for termination to a third party network (that is, transit

1 traffic), MTA is required if multiple BellSouth access tandems are used to
2 deliver the call to the third party's network. Here again, this adds only one
3 additional switching function, hardly "many more times" as Mr. Thomas
4 suggests.

5
6 Q. FURTHER ON PAGE 4 OF HIS TESTIMONY, MR. THOMAS
7 DISCUSSES "ALTERNATE ROUTING" AND THEN STATES: "THAT
8 [THAT IS, MTA] IS NOT A REQUIREMENT WHERE THE ILEC
9 DEPLOYS 'ALTERNATE ROUTING' TO RELIEVE CONGESTION OF
10 TRAFFIC ORIGINATING ON ITS NETWORK THAT IS DESTINED TO
11 THE INTERCONNECTING CARRIER'S END USERS OR TRAFFIC
12 ORIGINATING ON THE INTERCONNECTING CARRIER'S NETWORK
13 THAT HAS BEEN SUCCESSFULLY TRUNKED TO THE ILEC'S
14 TANDEM SWITCH." DO YOU AGREE?

15
16 A. No. The MTA service offering was not designed to relieve congestion, or
17 as a means of providing alternate routing for traffic originated by
18 BellSouth's end user customers. While the ALEC can use MTA as a
19 means to alternate route its originated traffic, provided the ALEC has trunk
20 groups to other access tandems or end offices within the LATA, this is not
21 the purpose for which MTA was designed. Instead, MTA allows an ALEC
22 to minimize the points of interconnection between the ALEC's network and
23 BellSouth's network.

24

1 Q. ON PAGE 5 OF HIS TESTIMONY, MR. THOMAS STATES
2 "BELLSOUTH, APPARENTLY SEEKING TO MINIMIZE DISRUPTIONS
3 TO ITS NETWORK, REQUIRED THAT A TRANSIT TRUNK NOT BE
4 PROVISIONED TO THE COLONIAL TANDEM SWITCH." IS HE
5 CORRECT?

6
7 A. No. At the time Intermedia deployed its switch in January 1997, there was
8 no need for Intermedia to order a transit group to BellSouth's Colonial
9 tandem switch. The trunk group was not necessary because at the time of
10 Intermedia's switch deployment, Intermedia had no NPA-NXX codes
11 homing on the Colonial tandem nor were there any other interconnecting
12 carriers (that is, ALECs or independent telephone companies) accessed
13 via BellSouth's Colonial tandem.

14
15 Q. ON PAGE 6 OF HIS TESTIMONY, MR. THOMAS STATES
16 "...BELLSOUTH REQUIRED THAT INTERMEDIA NOT INTERCONNECT
17 WITH THE SAN MARCOS [SIC] TANDEM SWITCH BY MEANS OF A
18 TRANSIT TRUNK.." PLEASE RESPOND.

19
20 A. Here again, at the time of Intermedia's switch deployment in Jacksonville,
21 Intermedia did not have any NPA-NXX's codes homing on BellSouth's
22 San Marco tandem nor were there any other interconnecting carriers (that
23 is ALECs or independent telephone companies) accessed via the San
24 Marco tandem.

25

1 Q. ON PAGE 5 AND AGAIN ON PAGE 6 MR. THOMAS INDICATED THAT
2 THE TRUNKING ARRANGEMENTS IN BOTH JACKSONVILLE AND
3 ORLANDO HAD "MTA CHARACTERISTICS". IS HE CORRECT?
4

5 A. No. Mr. Thomas states first on page 5 and then again on page 6 that
6 Intermedia had connected to both the BellSouth Colonial and San Marco
7 tandems by means of one-way trunk groups. At the time of Intermedia's
8 switch deployments, this would have been all that was needed for
9 Intermedia to terminate calls to the BellSouth end offices accessed via
10 those tandems. While this is no longer the case, it is Intermedia's
11 responsibility (as well as that of all other facilities-based local service
12 providers) to revisit trunking requirements as new NPA-NXX's codes are
13 assigned in the Local Exchange Routing Guide ("LERG").
14

15 Q. ON PAGE 7 OF HIS TESTIMONY, MR. THOMAS STATES THAT
16 BELL SOUTH APPARENTLY DETERMINED THAT MTA WAS
17 REQUIRED BECAUSE OF ACUTE CONGESTION PROBLEMS. IS HE
18 CORRECT?
19

20 A. No. An ALEC would request MTAs in order to simplify that ALEC's (but
21 not BellSouth's) network topology. Such an election is not influenced by
22 the level of call blocking being experienced, if any.
23

1 Q. ON PAGE 8 OF HIS TESTIMONY, MR. THOMAS STATES THAT
2 "BELLSOUTH IMPOSED A NETWORK TOPOLOGY REQUIREMENT..
3 DO YOU AGREE?

4

5 A. No. BellSouth imposes no such network topology on ALECs. ALECs are
6 free to design their own network topology to meet the needs of their own
7 business plans. BellSouth offers ALECs a number of different
8 interconnection topologies including, but not limited to, MTA.

9

10 Q. FURTHER ON PAGE 8, MR. THOMAS STATES "..IN MIAMI, THERE IS
11 NOT EVEN A SUGGESTION THAT MTA IS DEPLOYED." PLEASE
12 RESPOND.

13

14 A. Intermedia has chosen to interconnect at each BellSouth Access Tandem
15 within the LATA with transit trunk groups. Therefore, there has been no
16 need for Intermedia to establish MTA connectivity in Miami. However, I
17 am aware that several other ALECs have established MTA trunking
18 arrangements in Miami.

19

20 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

21

22 A. Yes.