INTERMEDIA COMMUNICATIONS INC.
SUREBUTTAL TESTIMONY OF EDWARD L. THOMAS
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 991534-TP

May 18, 2000

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, TITLE, AND THE NATURE OF YOUR POSITION WITH INTERMEDIA COMMUNICATIONS INC. ("INTERMEDIA").

A. My name is Edward L. Thomas. I am employed by Intermedia as Director-Voice Planning and Deployment. My business address is 3625 Queen Palm Drive, Tampa, Florida 33619. I am responsible for engineering the moves, adds, and changes of the telecommunications switching requirements within the Intermedia voice network. This includes ordering and placing central office equipment, ordering and placing circuit groups between various exchanges, network capacity management and network traffic management. I have worked in the telecommunications industry for thirty-five years. Before employment with Intermedia, I worked for GTE for twenty-nine years in several management capacities.

I have attended Kent State University and Wooster (Ohio) College, and completed numerous technical training courses and seminars.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes, I filed direct testimony in this proceeding on March 17, 2000.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I am appearing before the Commission in this proceeding as a technical witness to present evidence describing the telecommunications networks that

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Intermedia deploys in the state of Florida. My testimony will support Intermedia's position that it bills BellSouth for the transport and termination of traffic on Intermedia's Florida networks that is originated by BellSouth end users using the correct rate under the parties' interconnection agreement.

The purpose of my surrebuttal testimony is to address the rebuttal testimony of W. Keith Milner, which seeks inappropriately to discredit my direct testimony with several misleading and inaccurate statements.

Q. AT PAGE 4, LINES 18-22, MR. MILNER DISAGREES WITH YOUR TESTIMONY THAT THERE IS NO IMMEDIATE RECOURSE WHEN INTERMEDIA ENCOUNTERS TRAFFIC BLOCKAGE. WHAT DOES MR. MILNER OVERLOOK?

A. This statement would be correct if both parties took the same measures and care to ensure network capacities are adequate to maintain a high grade of service. However, as for the local network that exists with BellSouth and Intermedia, Mr. Milner is wrong.

The local network is a directional network, meaning that the reciprocal circuit groups (the trunk groups that carry the local traffic between Intermedia and BellSouth) are one way circuits. The flow of traffic from Intermedia to BellSouth is under the control of Intermedia. That means the issuance of Access Service Requests ("ASRs") is controlled by Intermedia and Intermedia is responsible to ensure that timely and ample orders are submitted and carried out to ensure network capacity is adequate.

In the reverse direction, BellSouth to Intermedia, traffic is controlled by BellSouth. Here, BellSouth is responsible to monitor traffic usage and to issue ASRs in a timely manner with sufficient quantities to ensure the quality of

service. It is in this direction that Intermedia experiences far and away the greatest incidence of call blockage.

Mr. Milner suggests that blockage problems can be averted by accurately forecasting traffic and installing interconnection trunks consistent with the forecasts. However, it is BellSouth who falls short. BellSouth has never-not one time-provided Intermedia with a forecast of circuit requirements for any of the markets in which Intermedia competes with BellSouth. Going beyond the requirements of the interconnection agreement, Intermedia consistently and routinely provides BellSouth with semi-annual forecasts, forecasts that also includes forecasts for circuit quantities for traffic inbound to Intermedia, the responsibility of BellSouth. In fact, Intermedia has many times provided BellSouth with interim forecasts when special needs and new opportunities warrant.

BellSouth has not accurately forecasted traffic and then engineered and installed appropriate quantities of interconnection trunks, as Mr. Milner seems to imply. This is shown by the number of times BellSouth has allowed the circuit groups that are under its control to go into reorder or blockage situations. See Exhibit ELT-8. Neither does it adequately monitor trunk capacity utilization. Much more often than not, Intermedia calls BellSouth to point up over-utilization and get the trunk expansion cycle started.

Conversely, Intermedia's traffic management system constantly monitors traffic levels in both directions, enabling us to react timely and appropriately to approaching at-capacity conditions. Hence, Intermedia rarely experiences outbound call blockages.

Intermedia has often provided this traffic data to BellSouth, but I do not recall even an instance when BellSouth has provided similar data to Intermedia.

Q. WHAT MANAGEMENT PROCEDURES DO YOU EMPLOY TO ASSURE THE AVOIDANCE OF BLOCKAGE?

A. I meet weekly with my provisioning, planning, traffic engineering, switch engineering, and translations staff, and associated infrastructure and field operations coordination departments, to review the status of the voice network. We operate with a 60% rule, which is to say that when a trunk group reaches 60% of capacity it is time to issue a work order to generate an ASR to augment the group. In the case of those trunk groups where Intermedia does not control the traffic, we issue a request to the LEC, IXC, or CAP in question for additional circuits. These procedures have been effective in maintaining as close to a block-free network as we are capable of achieving from our side.

Q. AT PAGE 4, LINES 22-24, MR. MILNER SUGGESTS THAT INTERMEDIA IS FREE TO IMPLEMENT ALTERNATE ROUTING TO MINIMIZE ADVERSE EFFECTS OF TRUNK BLOCKAGES. IS THAT A CONSTRUCTIVE SUGGESTION?

A. No, it is not. On the long distance ("LD") side, Intermedia has a number of ways to use alternate routing to ensure completions and a high quality of service and we do this very well.

It is different on the local side. In a network of directional trunks, Intermedia has the ability to trunk direct to end offices in the direction it controls. These trunks are "Primary High" trunks and are selected first to take the traffic. They are designed to approach or go into saturation, and when they do, the traffic is alternate routed to the tandem group (for BellSouth, a one-way directional group) and is terminated in this way. This one-way tandem group is an "Alternate Final" group. When it is saturated, calls are blocked. They then are routed to

treatment, which may be a recording announcing that the call cannot be completed or to a 120 i.p.m. busy signal indicating an all-trunks-busy condition.

Intermedia has had to resort at times to alternate routing local traffic to the LD side of the switch and paying LD access charges to complete the "free" local call. This becomes necessary when BellSouth does not have the facilities allowing Intermedia to add outbound trunks. This is, of course, a very expensive method of providing quality service, and it should not be necessary.

For inbound traffic, where BellSouth consistently allows the "Alternate Final" route to become saturated, Intermedia has no recourse. BellSouth, of course, would not route local traffic to the LD access side in order to terminate it. As a result, customers are plagued during these periods with non-completions and multiple re-dials, which are ascribed to Intermedia's inability to maintain an effective network, although the source of the problem is BellSouth's network limitations.

There is absolutely nothing Intermedia can do, in a directional network, to alternate route around blockage in the inbound direction. That is why Mr. Milner's suggestion is not constructive. This problem does not exist in a two-way network, the kind of network arrangement Intermedia has with USWest, GTE and SBC. BellSouth, however, resists two-way network arrangements with Intermedia.

Q. ON PAGE 5, LINES 4-9, MR. MILNER CLAIMS THAT IN JANUARY AND FEBRUARY 2000, ALECS EXPERIENCED BLOCKAGE MORE THAN 3% ON ONLY 1.7% OF THEIR TRUNK GROUPS, WHICH WAS COMPARABLE WITH BELLSOUTH'S OWN EXPERIENCE. DOES THIS REFLECT INTERMEDIA'S EXPERIENCE?

A. Our data suggest that this is wide of the mark for Intermedia. These numbers reflect an aggregated and averaged experience, and, therefore, are unenlightening, if not misleading. For example, if one examines Exhibit ELT-8, pages 2 and 3, it is clear that at North Dade for much of this year inbound "busy day/busy hour" ("BDBH") and "3-day average" ("3D-AV") traffic has been in congestion.

Q. ON PAGE 5, LINES 17-25, AND PAGE 6, LINES 1-4, MR. MILNER TAKES ISSUE WITH YOUR TESTIMONY THAT CALLS TRANSPORTED BY MULTIPLE TANDEM ACCESS ARE SWITCHED MANY MORE TIMES THAN IF THEY WERE TO BE TRANSPORTED OVER DIRECT TRUNKS. DOES HE MISS THE POINT YOU MAKE?

A. Yes, he appears to. My point is that when switching in a multiple tandem access arrangement is more even by one, that is "many more" times and to that extent, which is in the least extensive such arrangement, network efficiency is downgraded.

Q. ON PAGE 6, LINES 16-22, MR. MILNER STATES THAT MULTIPLE TANDEM ACCESS ARRANGEMENTS ARE NOT INTENDED TO RELIEVE CONGESTION OR TO PROVIDE ALTERNATE ROUTING FOR TRAFFIC OUTBOUND FROM BELLSOUTH. IS HE CORRECT?

A. No, he is not. Intermedia is connected to all of the BellSouth tandem switches, and to a great number of the BellSouth end offices and has, therefore, no need to consider MTA as an alternate routing solution, all the more so since almost all the blockage experienced is to inbound traffic from BellSouth. Nevertheless, multiple tandem access arrangements may well avail BellSouth in completing traffic inbound to Intermedia.

While Mr. Milner is correct to say multiple tandem access arrangements enable ALECs to minimize interconnection investment, they are also useful to

relieve the kinds of congestion problems BellSouth experiences in handling Intermedia traffic in, for example, Miami.

Q. ON PAGE 7 AND PAGE 8, MR. MILNER TESTIFIES THAT AT THE TIMES INTERMEDIA DEPLOYED ITS SWITCHES IN ORLANDO AND JACKSONVILLE, IT (INTERMEDIA) HAD NO NEED FOR A TRANSIT GROUP TO BELLSOUTH'S COLONIAL AND SAN MARCO TANDEM SWITCHES. DOES THAT ADDRESS THE POINT YOU MAKE IN YOUR TESTIMONY RELATIVE TO THE NETWORK ARRANGEMENTS IN PLACE AT THOSE TIMES?

A. No, I don't think it does. My point is that the BellSouth network arrangements that existed in Orlando and Jacksonville at the time of Intermedia's switch deployment had the characteristics of multiple tandem access and they existed on the initiative of BellSouth, not Intermedia, long before the MTA Amendment.

Q. ALSO ON PAGE 8, MR. MILNER DISAGREES WITH YOU THAT IT WAS ACUTE CONGESTION PROBLEMS WITH TRAFFIC INBOUND TO INTERMEDIA ON BELLSOUTH'S NETWORK THAT APPARENTLY GAVE RISE TO THE MTA AMENDMENT? WHAT IS YOUR RESPONSE?

A. As I have already testified, Intermedia's experiences with call blockage have almost always been with inbound traffic over BellSouth-controlled trunks, not, except rarely, with outbound traffic over Intermedia-controlled trunks. Furthermore, Intermedia has direct trunk connections to each of BellSouth's tandem switches in Florida. It was in those circumstances that BellSouth proposed the MTA Amendment to Intermedia. In my direct testimony at page 7, I merely address the prevailing circumstances at the time the MTA Amendment became an issue, circumstances certainly consistent with BellSouth's recognition

of multiple tandem access as a means of resolving congestion on its trunks inbound to Intermedia. Contrary to Mr. Milner's apparent understanding, I did not address "election" of multiple tandem access.

Q. ON PAGE 9, MR. MILNER DISAGREES WITH YOU THAT BELLSOUTH IMPOSED A NETWORK TOPOLOGY ON INTERMEDIA. WHAT IS YOUR RESPONSE?

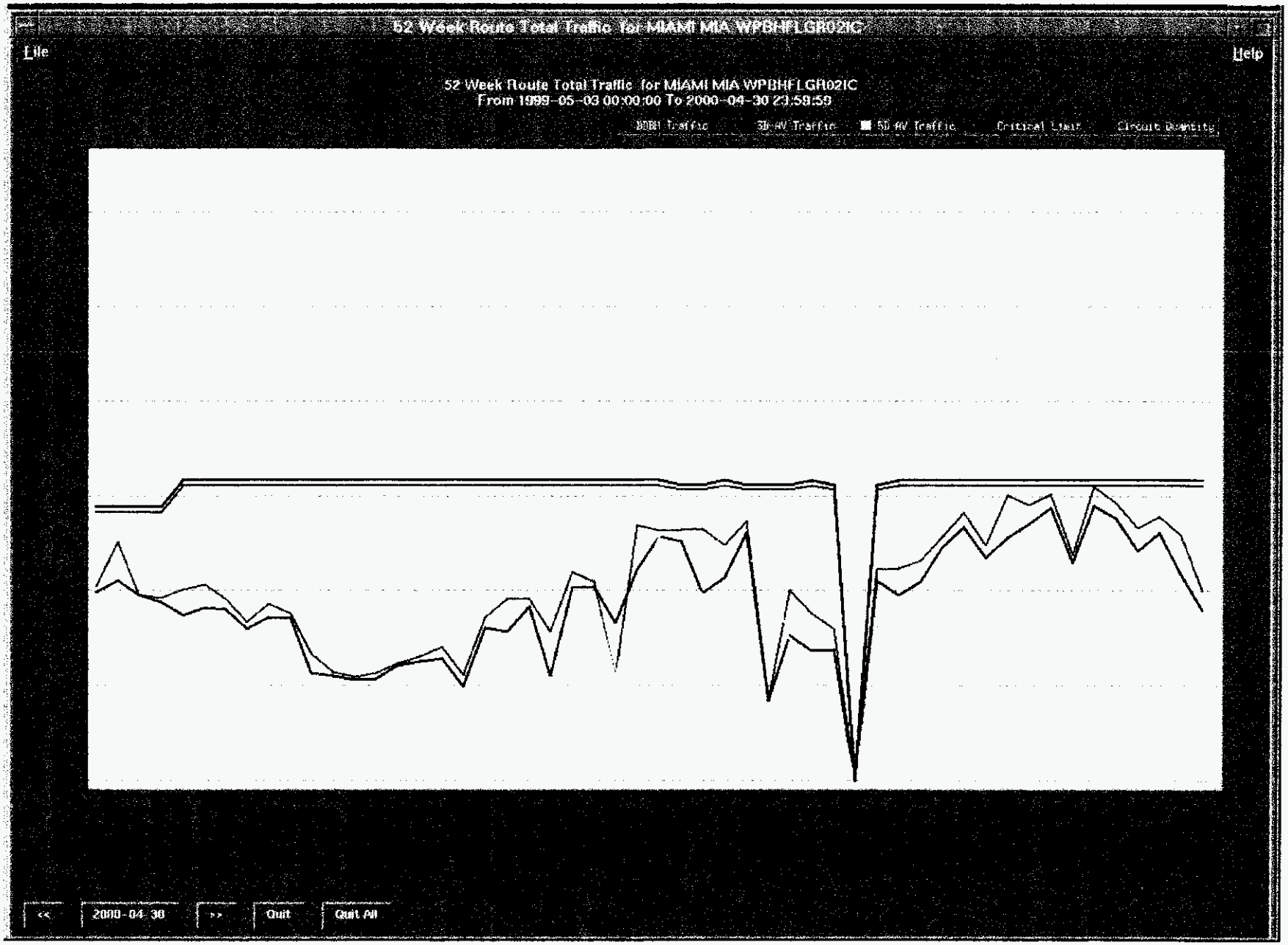
A. As I have stated in my direct testimony and here as well, BellSouth did not permit Intermedia to install transit groups to the Colonial and San Marco tandem switches at the time Intermedia put its Orlando and Jacksonville switches in service. In addition, BellSouth has always rejected two-way trunking, an arrangement in which Intermedia would have network control over both inbound and out bound traffic. Mr. Milner's statement that BellSouth offers ALECs a number of different topologies underscores my point that ALECs have been required to select from BellSouth's less than optimal network menu.

Q. WHAT DOES MR. MILNER'S POINT APPEAR TO BE IN COMMENTING ON PAGE 9 THAT SEVERAL OTHER ALECs HAVE ESTABLISHED MTA TRUNKING ARRANGEMENTS IN MIAMI?

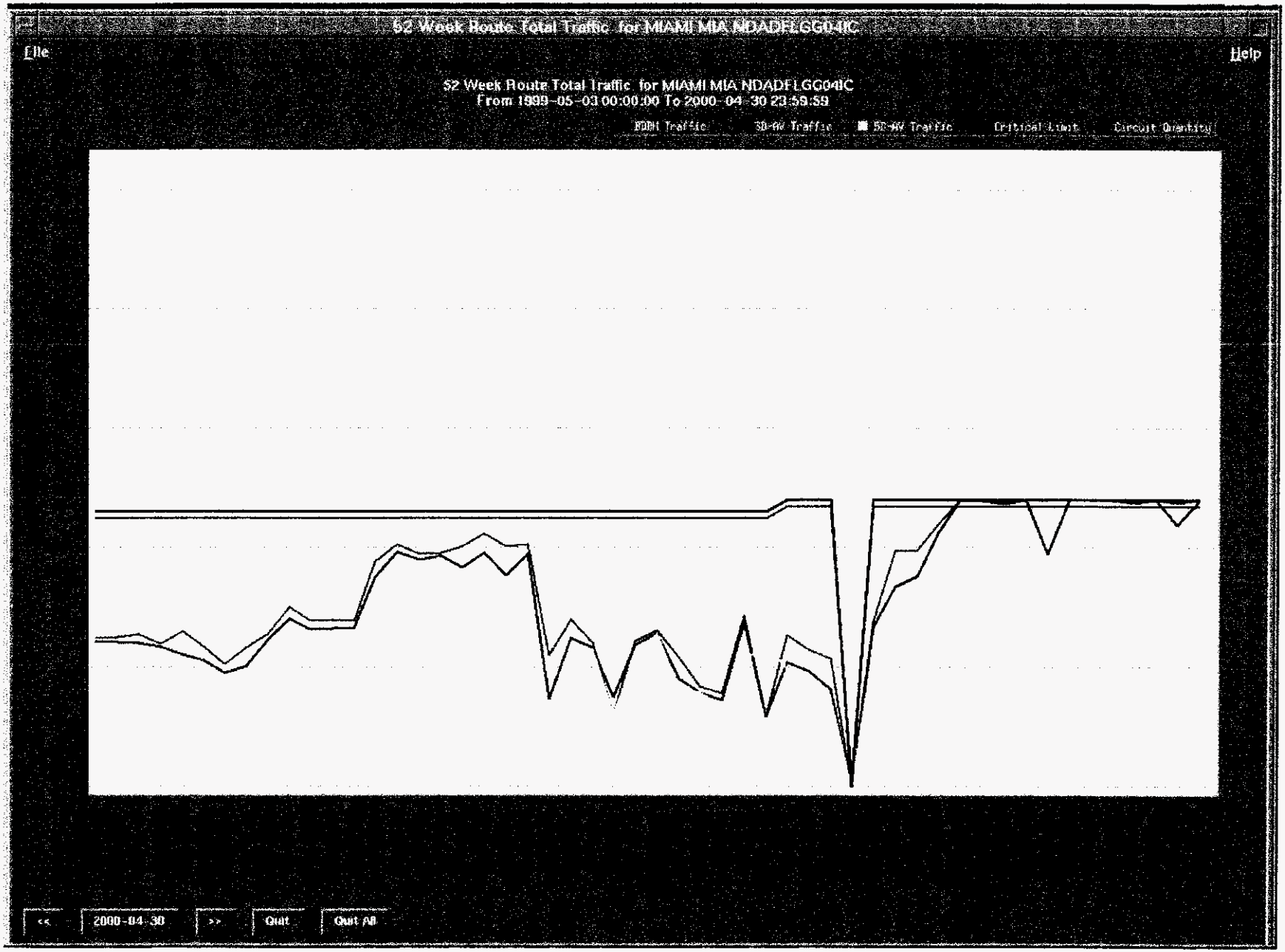
A. This comment appears to be gratuitous. Mr. Milner acknowledges that Intermedia is interconnected with each BellSouth tandem switch in the Southeast LATA by means of transit groups and has, therefore, no need for multiple tandem access.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

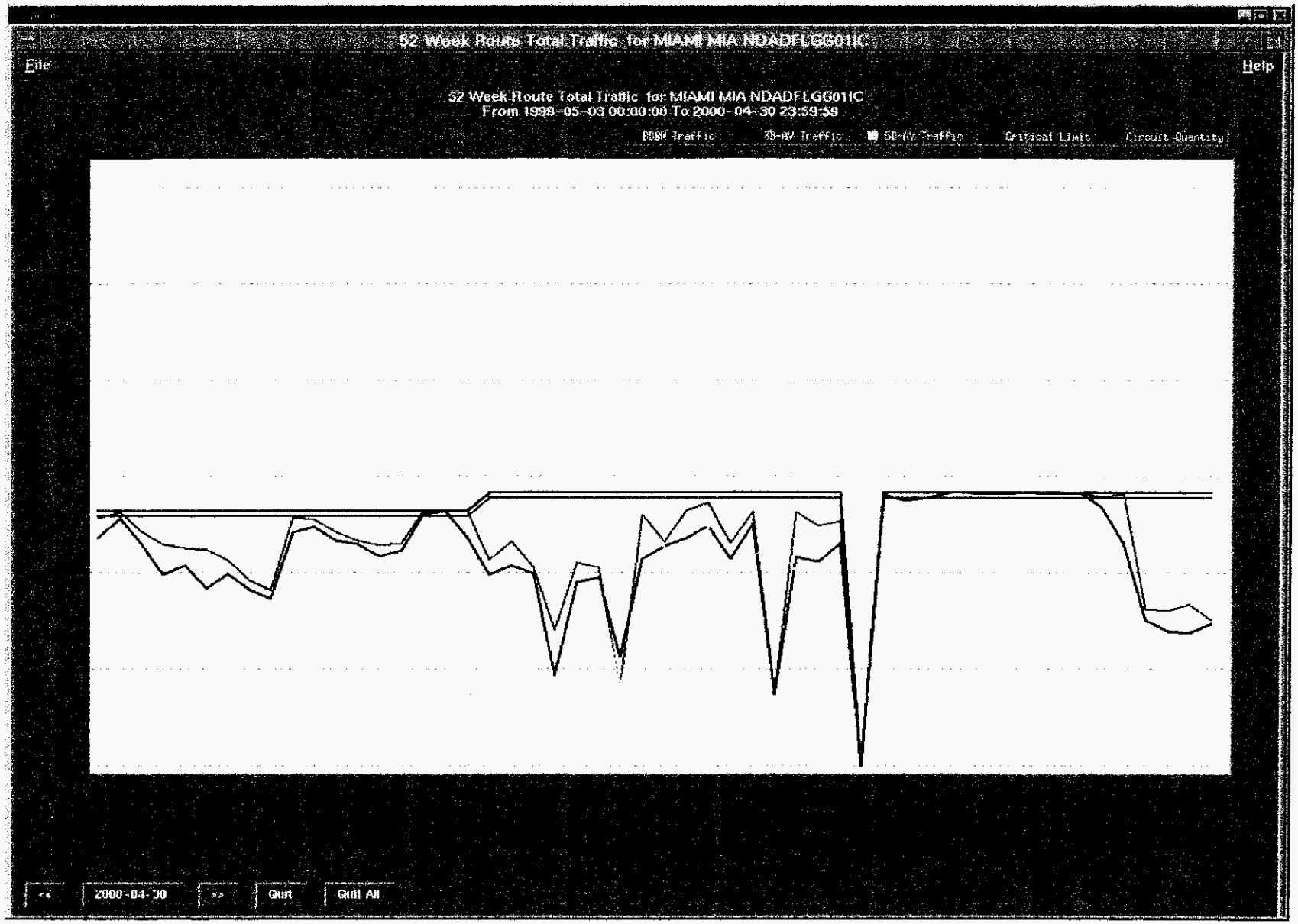
A. Yes, it does.



Docket No. 991534-TP
Exhibit ELT-8
Page 1 of 3



Docket No. 991534-TP
Exhibit ELT-8
Page 2 of 3



Docket No. 991534-TP
Exhibit ELT-8
Page 3 of 3

CERTIFICATE OF SERVICE

Docket No. 991534-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery* or by Federal Express for overnight delivery this 18th day of May, 2000, upon the following:

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