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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 990649-TP

June 29, 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. ARE YOU THE SAME W. KEITH MILNER WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I will respond to portions of the testimony of Supra Telecommunications & Information Systems, Inc. (Supra Telecom) witness David Nilson.

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Q. ON PAGE 4 OF HIS TESTIMONY, MR. NILSON STATES "ONE SUCH FEATURE IS THE ABILITY OF THE PORT [THAT IS THE SWITCH PORT] TO PRODUCE STUTTER DIALTONE, OR ACTIVATE A LIGHT ON THE TELEPHONE SET OF A SUBSCRIBER IN RESPONSE TO A SIGNAL FROM A VOICEMAIL SYSTEM OR PROVIDER TO LET THE TELEPHONE SUBSCRIBER KNOW THERE IS A MESSAGE WAITING. TRADITIONALLY THIS TASK HAS BEEN DONE VIA THE SYSTEM MESSAGE DESK INTERFACE (SMDI) AND ENHANCEMENTS TO IT SUCH AS INTER SWITCH VOICE MESSAGING (ISVM) WHICH ALLOWS ONE SWITCH TO PASS MESSAGING REQUESTS ACROSS THE NETWORK TO OTHER SWITCHES WITHOUT THE USE OF A DEDICATED NETWORK." DO YOU AGREE WITH MR. NILSON'S DESCRIPTION OF SMDI AND ISVM?

A. Yes, to an extent. I wish to explain, however, that neither SMDI or ISVM are themselves call related databases. Neither are SMDI or ISVM themselves signaling networks, though it is possible to use SMDI or ISVM in conjunction with signaling systems such as Signaling System 7 (SS7).

Q. ON PAGE 4 OF HIS TESTIMONY, MR. NILSON STATES HIS APPARENT BELIEF THAT SMDI AND ISVM ARE FUNCTIONS PROVIDED BY THE SWITCH PORT. DO YOU AGREE?

1 A. Yes. Both SMDI and ISVM capabilities are available to Supra Telecom or
2 any ALEC (Alternative Local Exchange Carrier) when that ALEC acquires
3 unbundled local switching from BellSouth.

4

5 Q. ON PAGE 4 OF HIS TESTIMONY, MR. NILSON ASSERTS THAT IN
6 FLORIDA THERE IS NO UNBUNDLED ACCESS TO SMDI OR ISVM.
7 DO YOU AGREE?

8

9 A. No. If I correctly read Mr. Nilson's testimony, he seems to say that Supra
10 Telecom cannot acquire access to SMDI or ISVM on an unbundled basis.
11 He is incorrect. Supra Telecom or any other ALEC need simply acquire
12 unbundled local switching from BellSouth and thus gain access to SMDI or
13 ISVM functionality. If, on the other hand, Mr. Nilson is advocating a new
14 unbundled network element called unbundled SMDI or unbundled ISVM, I
15 believe there is no need for such a new offering since the functionality is
16 already available via unbundled local switching.

17

18 Q. ON PAGE 5 OF HIS TESTIMONY, MR. NILSON STATES "BELLSOUTH
19 DOES NOT PROVIDE UNBUNDLED ACCESS TO THIS SIGNALING
20 NETWORK, BUT IN THEIR FFC #1 [sic] ACCESS TARIFF LISTS SMDI
21 AND SOMETHING CALLED ISMDI." IS MR. NILSON CORRECT THAT
22 BELLSOUTH DOES NOT OFFER UNBUNDLED ACCESS TO ITS
23 SIGNALING NETWORK?

24

1 A. No, he is mistaken. First, the FCC, for example in its decision in
2 BellSouth's second Louisiana 271 application, found that BellSouth offers
3 nondiscriminatory access to its signaling network as required by the
4 Telecommunications Act of 1996. Second, although Mr. Nilson then
5 opines that SMDI is not as cost effective for an ALEC as using ISVM,
6 both SMDI and ISMDI offer advantages to users of those services.
7 BellSouth's Access Tariffs offer a variety of services, and no one service is
8 "best" in every case. BellSouth endeavors to have a wide product range
9 in order to be able to offer customers the services they want. If Supra
10 Telecom wants to purchase SMDI from BellSouth's Access Tariff, Supra
11 Telecom is free to do so. If Supra Telecom prefers ISMDI to SMDI, Supra
12 Telecom is free to purchase ISMDI via BellSouth's Access Tariff.

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14 Q. ON PAGE 5 OF HIS TESTIMONY MR. NILSON STATES "NOWHERE IS
15 THERE ANY MENTION OF DIRECT ACCESS TO THE ISVM
16 SIGNALING, OR UNBUNDLED ACCESS TO ANY SIGNALING
17 REQUIRED TO ACTIVE MWI [THAT IS, MESSAGE WAITING
18 INDICATOR] ON A LEASED LOCAL SWITCHING PORT. THESE
19 OMISSIONS ARE CREATING AN UNUSUALLY HIGH BARRIER TO
20 ENTRY FOR AN ALEC LIKE SUPRA TELECOM WHO IS EXPECTED BY
21 TELEPHONE SUBSCRIBERS TO PROVIDE THE SAME SERVICES AS
22 THE ILEC AS SEAMLESSLY AS THE ILEC PROVIDES THOSE
23 SERVICES." PLEASE RESPOND.

24

1 A. First of all, I assume that when Mr. Nilson said, "Nowhere is there any
2 mention of direct access..." that he is again referring to BellSouth's Access
3 Tariff. If I am correct, then there is no need in the section of the Access
4 Tariff where BellSouth offers SMDI or ISMDI for the Access Tariff to
5 discuss how an ALEC such as Supra Telecom can gain access to
6 BellSouth's signaling network on an unbundled basis. Likewise, there is
7 no need for BellSouth's Access Tariff discussions of SMDI or ISMDI to
8 inform Supra Telecom as to how to avail itself of unbundled local
9 switching. Thus I believe that Mr. Nilson is mistaken when he says that to
10 not have such discussions in BellSouth's Access Tariffs have the effect of
11 "creating an unusually high barrier to entry for an ALEC such as Supra
12 Telecom..." Surely Mr. Nilson is aware of the difference in Access
13 Services and unbundled network elements. If his suggestion is that
14 BellSouth should offer its Access Services at Total Element Long Run
15 Incremental Cost (TELRIC) based rates, he is mistaken.

16

17 Q. ON PAGE 6 OF HIS TESTIMONY, MR. NILSON STATES "ALEC
18 ACCESS TO THE ISVM SIGNALING 'NETWORK' SHOULD BE
19 DEFINED AS A FUNDAMENTAL COMPONENT OF LOCAL SWITCHING
20 LINE AND TRUNK PORTS AND ALEC ACCESS TO THIS NETWORK
21 REQUIRED OF AND PROVIDED BY ALL FLORIDA ILECS AS IT IS
22 ELSEWHERE IN THE COUNTRY." DOES BELL SOUTH OPERATE AN
23 "ISVM SIGNALING NETWORK" AS MR. NILSON PURPORTS?

24

1 A. No. BellSouth uses SS7 network architecture for its switch-to-switch
2 signaling needs. SS7 networks are multifunctional, and there is no need
3 for a separate ISVM signaling network as Mr. Nilson's statement implies.
4 Instead, BellSouth's SS7 network handles all inter-switch signaling using
5 industry standard signaling message formats. If Supra Telecom wants to
6 acquire unbundled local switching and then use the SMDI and ISMDI
7 functionality of that unbundled local switching, Supra Telecom is free to do
8 so. If Supra Telecom wants to acquire unbundled signaling, it is free to do
9 that as well. BellSouth provides both unbundled local switching and
10 unbundled access to its signaling network to Supra Telecom and every
11 other ALEC in Florida. Thus, I strongly deny Mr. Nilson's assertion that
12 BellSouth has artificially created barriers to competition. To the contrary,
13 BellSouth has unbundled its network according to the requirements of the
14 FCC and this Commission. If Mr. Nilson envisions some new unbundled
15 network element that he believes BellSouth should provide, he has failed
16 in explaining what that new unbundled network element would be. If he is
17 attempting to simply re-price access services at TELRIC based rates, I
18 believe his proposal should be rejected out of hand.

19

20 Q. ON PAGE 7 OF HIS TESTIMONY, MR. NILSON IMPLIES THAT SOME
21 NEW FORM OF DIRECT ACCESS TO LOCAL NUMBER PORTABILITY
22 (LNP) QUERY SERVICE SHOULD BE PROVIDED AND STATES
23 "THERE IS NO WAY FOR AN ALEC TO DIRECTLY PROVISION LNP
24 TRANSLATIONS..." PLEASE RESPOND.

25

1 A. Mr. Nilson is incorrect. Supra Telecom is free to create its own LNP
2 database, as have numerous ALECs. Or Supra Telecom is free to
3 subscribe to the LNP database service offered by commercial providers.
4 Or Supra Telecom is free to subscribe use BellSouth's LNP Query Service
5 to meet its call routing responsibilities.

6
7 BellSouth's LNP Query Service is a call related database service that is
8 used by local carriers and other carriers who do not choose to build their
9 own LNP database. LNP Query Service allows an ALEC to query the
10 BellSouth LNP database on a real time, call related basis to obtain LNP
11 routing information. The information in BellSouth's LNP database is
12 obtained from Nuestar, the National LNP Administrator. This is the same
13 information that is downloaded to all LNP database owners, and Nuestar,
14 not BellSouth, controls distribution. BellSouth does not enter information
15 related to routing ported numbers directly into its own LNP database, but
16 rather receives a download of the information from Nuestar, just as every
17 other LNP database owner does.

18
19 BellSouth's LNP Query Service has nothing to do with the actual porting of
20 numbers by the switches involved, but rather provides a method for
21 carriers without an LNP database to be able to fulfill their call processing
22 responsibilities. BellSouth's LNP Query Service has been offered under
23 its FCC Tariff Number 1 since the fourth quarter of 1998. BellSouth
24 currently has thirty-five customers for this service. This service is not
25 ordered via a Local Service Request (LSR), but rather is ordered using a

1 specific set of implementation forms available to ALECs and other carriers
2 from their assigned BellSouth Account Manager.

3
4 If Mr. Nilson's reference to directly provisioning LNP translations relates to
5 the porting of numbers, I fail to understand his concern. BellSouth must
6 know of Supra Telecom's intentions with regard to individual Supra
7 Telecom end user customers. If Supra Telecom wishes to port a number
8 from BellSouth, Supra Telecom must include that information on its LSR
9 (Local Service Request) to BellSouth, and then perform its responsibilities
10 along with BellSouth in conducting the loop cutover process with LNP, a
11 topic that has been scrutinized in exhaustive detail in other proceedings
12 before this Commission.

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14 **Q. ON PAGE 7 OF HIS TESTIMONY, MR. NILSON DISCUSSES THE LINE**
15 **INFORMATION DATABASE (LIDB) AS PART OF HIS EARLIER**
16 **DISCUSSION OF LNP QUERY SERVICE. ARE LNP QUERY SERVICE**
17 **AND LIDB RELATED?**

18
19 **A. No. Without explanation, Mr. Nilson jumps to the subject of LIDB access**
20 **so I cannot fathom the relationship to his earlier testimony. He seems to**
21 **be advocating ALEC access to the call related database referred to as**
22 **LIDB (which BellSouth already provides), but I cannot tell what, if any,**
23 **issue Mr. Nilson has regarding BellSouth's provision of access to LIDB.**

24
25 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

1

2 A. Yes.