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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF DAVID A. COON
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000649-TP
SEPTEMBER 7, 2000

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

A. My name is David A. Coon. I am employed by BellSouth as Director – Interconnection Services for the nine-state BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. ARE YOU THE SAME DAVID A. COON WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I will address the direct testimony of MCI WorldCom witness, Marsha Emch regarding Issue 105 raised in MCI WorldCom's Petition for Arbitration in Florida.

1 Q. ON PAGE 2 OF MS. EMCH'S TESTIMONY SHE STATES THAT THOSE
2 MEASUREMENTS INCLUDED IN WORLDCOM'S VERSION OF
3 ATTACHMENT 10 ARE THE MEASURES THAT SHOULD BE USED IN
4 THE BELLSOUTH/WORLDCOM INTERCONNECTION AGREEMENT.
5 WOULD YOU CARE TO COMMENT?
6

7 A. Yes. I would like to reemphasize, as I stated previously in my direct
8 testimony, that BellSouth's SQMs are the appropriate set of
9 measurements that should be adopted by this Commission. BellSouth's
10 SQMs fully and comprehensively comply with the requirements of the
11 Telecommunications Act of 1996 (Act) to demonstrate either "parity of
12 service" or providing an ALEC "a meaningful opportunity to compete." To
13 attempt to measure every single process and sub-process associated with
14 the business relationship between an ALEC and an ILEC, as the
15 WorldCom plan attempts to do, was never the intention of the Act.
16 Furthermore, performance measurements impact the entire ALEC
17 community in Florida and as such, are more appropriately addressed in
18 the generic performance measurement proceeding currently ongoing here
19 in Florida. It would be premature to arbitrate an ALEC specific set of
20 measurements, as proposed by WorldCom at this time, before completion
21 of that generic proceeding. Interestingly enough, WorldCom is an active
22 participant in this generic proceeding, even though Ms. Emch does not
23 acknowledge it in her direct testimony. Finally, BellSouth's Service Quality
24 Measurements have already been adopted by in excess of 87 ALECs in
25 Florida as part of their interconnection agreements.

1 Q. ON PAGES 2 THROUGH 10 OF HER DIRECT TESTIMONY, MS. EMCH
2 IDENTIFIES SPECIFIC MEASUREMENTS MISSING FROM THE
3 BELLSOUTH SERVICE QUALITY MEASUREMENTS (SQM). WOULD
4 YOU CARE TO COMMENT ON EACH OF THESE MISSING
5 MEASUREMENTS?

6

7 A. Yes. I would like to take this opportunity to comment on each of the key
8 measurements that Ms. Emch testified are missing from BellSouth's SQM.

9

10 **Percent Design Layout Records Received in X Days.**

11 This is an example of a measurement of a sub-process. This particular
12 measurement is for the Design Layout Record associated with
13 interconnection trunks. This is part of the overall process of ordering and
14 provisioning interconnection trunking. Both of these processes are
15 currently measured by the FOC Timeliness, Order Completion Interval,
16 and Missed Installation Appointments measurements, to name a few.
17 There is no need for an additional measurement that addresses only a
18 portion of the ordering and provisioning processes.

19

20 Ms. Emch notes that this measurement has been adopted in several
21 states. She offers similar references throughout her testimony in an
22 apparent effort to convince the Florida Commission to rely on decisions
23 made in other states rather than evaluating the need for the measurement
24 in Florida. I will not further confuse the issue by citing the states where
25 Ms. Emch's proposed measurements have not been adopted. Rather, the

1 Florida Commission should make an independent evaluation of each
2 proposed measurement and assess its incremental value in detecting non-
3 discriminatory access in Florida.

4

5 **Percent On-Time Loss Notification.**

6 This is a prime example of how ludicrous the ALECs have gotten in their
7 pursuit of additional unwarranted and unnecessary performance
8 measurements. Not only is Ms. Emch suggesting that BellSouth
9 participate in the highly anti-competitive practice of notifying WorldCom in
10 advance, that they are about to lose one of their customers, either to
11 BellSouth or another ALEC, she goes further to recommend that this
12 Commission order BellSouth to measure how well BellSouth does it. This
13 Commission should dismiss this request.

14

15 **Average Offered Interval.**

16 BellSouth believes that it's existing measurements, Average Order
17 Completion Interval, when looked at in conjunction with Percent Missed
18 Due Dates, more accurately reflects the customer experience
19 representative of this proposed measurement by WorldCom.

20

21 **Percent Order Accuracy.**

22 BellSouth's position has always been that this measurement is
23 unnecessary and overly burdensome and that BellSouth's existing
24 measurement, Percent Provisioning Troubles within 30 Days of Service
25 Order Activity is representative of the accuracy of BellSouth's order

1 completions. The FCC agreed in FCC 98-72, ¶ 68, in stating "We believe,
2 therefore, that this measurement (Percentage of Troubles in 30 Days for
3 New Orders) will provide information about whether the incumbent LEC
4 processed the order accurately. Accordingly, we propose that incumbent
5 LECs measure the Percentage of Troubles in Thirty Days for New Orders
6 as a substitute for LCUG's proposed measurement of Percentage Orders
7 Processed Accurately. We believe that the Percentage of Troubles in
8 Thirty Days for New Orders will provide the information sought by LCUG,
9 but will be a less burdensome measurement than measuring order
10 accuracy". The LCUG proposed measurement is the same measurement
11 as proposed by Ms. Emch in this proceeding.

12
13 **Provisioning Troubles Prior to Loop Acceptance.**

14 BellSouth is adding a new "Hot Cut" measure, per cent installation
15 troubles within 7 days, that will allow the ALEC to report a trouble as soon
16 as the service order is completed. As with any cutover, services that do
17 not work are resolved during the cutover before the order is completed in
18 the system. All other items will be included in this new measurement.
19 WorldCom's proposed measurement is not needed to measure the quality
20 of the cutovers.

21
22 **Percent Service Loss From Early Cuts and Percent Service Loss**
23 **from Late Cuts.**

24 BellSouth is introducing several new hot cut measurements that replace
25 the need for these measurements, Hot Cut Timeliness per cent within

1 Interval, Hot Cut Timeliness Average Interval, and Reason for missed
2 cuts. The Hot Cut Timeliness reports also provide a distribution of time so
3 that the Commission and WorldCom can view early and late cuts
4 individually.

5
6 **Percent of Time 10-Digit Trigger is Applied "X" Hours Prior to the**
7 **LNP Order Due Date.**

8 BellSouth has developed a new measurement, Average Disconnect
9 Timeliness & Disconnect Timeliness Interval Distribution, which BellSouth
10 believes more accurately reflects its performance in responding to the
11 ALEC message to activate the number porting. BellSouth's measurement
12 defines disconnect timeliness as the interval between the time the LNP
13 Gateway receives the "Number Ported" message from Numbering Plan
14 Administrative Center (signifying the ALEC activation of number porting)
15 until the time that service is disconnected. This interval effectively
16 measures BellSouth's responsiveness by isolating it from impacts that are
17 caused by ALEC related activities.

18
19 **Average Notification of Interface/OSS Outage.**

20 This is another example of an ALEC request for a meaningless
21 measurement. For the past six months BellSouth has been averaging
22 over 99.9% OSS interface availability. What could Ms. Emch hope to gain
23 from a report that only deals with one tenth of one percent or less of the
24 time that the interface was unavailable. In addition, BellSouth posts all

1 scheduled downtimes, in advance, on the BellSouth Interconnection web
2 site.

3

4 **Percent of Change Management Notices and Documentation Sent**
5 **On-Time.**

6 BellSouth agrees that a Change Management measurement is necessary.
7 BellSouth is delivering two new measurements to satisfy this requirement.
8 BellSouth believes that the purpose of change management is to work
9 together as a team and prioritize the requirements for the good of all
10 participants. With that in mind measuring anything other than the process
11 is unnecessary. The new BellSouth measurements are results focused
12 and are the only ones necessary to provide a parity comparison of the
13 change management process.

14

15 **Percent Software Certification Failures and Software Problems**
16 **Resolution Timeliness.**

17 BellSouth believes that the testing arrangements made available with any
18 software update are adequate to resolve these issues before the software
19 is loaded. The change management process is more suitable to establish
20 methods and procedures for software updates. Participating in that
21 process would eliminate the need for such measures.

22

23 **Percent of ILEC Responses to Reciprocal Trunk Requests in "X"**
24 **Days.**

25

1 For interconnection trunking, the key measurement is trunk blocking.
2 BellSouth already has this measurement. The primary focus of
3 Interconnection Trunk measurements is to have sufficient trunking
4 capacity from the BellSouth network to the ALEC switch when traffic is
5 increased substantially, such as might occur when an Internet Service
6 Provider is switched to the ALEC. The best solution to this problem is not
7 through additional measurements but through an accurate forecast by the
8 ALEC of traffic requirements.

9

10 **Mean Time to Notify ALEC of Network Disruptions and Restorations.**

11 This item would be better handled through contract negotiations on an
12 individual basis rather than try and develop additional measures for all
13 ALECs. Beginning in April BellSouth added disaster information and
14 system outages to its interconnection web site currently available to the
15 ALECs.

16

17 **Average Collocation Delay Days for Missed Due Dates.**

18 BellSouth agrees with Ms. Emch's statement on lines 3 and 4, page 9 of
19 her direct testimony. "It is critical that collocation due dates are not
20 missed at all and it is important to know how often collocation due dates
21 are missed." BellSouth's existing collocation measurements provide
22 information on missed due dates and the frequency of misses. BellSouth
23 already has three measurements for collocation including the percent of
24 missed due dates that are summarized below for the last six months. As
25 is readily visible from the matrix, missing due dates for collocation

1 arrangements, whether virtual or physical, has not been a problem for
 2 BellSouth in Florida. These numbers represent the aggregate of all
 3 ALECs in Florida, not just WorldCom. Until such time as WorldCom is
 4 able to produce substantive evidence justifying the need for development
 5 of Average Collocation Delay Days for Missed Due Dates, there is no
 6 legitimate reason for this Commission to order it as part of this proceeding.

7 **PERCENT OF DUE DATES MISSED**

	Physical Collocation		Virtual Collocation	
	Initial Install	Augmentation	Initial Install	Augmentation
1/22 – 2/21/2000	0.8	0	0	0
2/22 – 3/21/2000	2	0	0	0
3/22 – 4/21/2000	22	0	0	0
4/22 – 5/21/2000	7	0	0	0
5/22 – 6/21/2000	0	0	0	0
6/22 – 7/21/2000	0	0	0	0

8
 9 **Percent NXXs Loaded and Tested Prior to the LERG Effective Date.**

10 BellSouth's systems do not currently capture the date an NXX is loaded or
 11 tested or the LERG effective date. In order to develop this measurement,
 12 BellSouth would be required to develop a new system capability to capture
 13 this data as well as modify its Performance Measurement Analysis
 14 Platform (PMAP) system to produce reports on the performance of the
 15 new system capability. There has never been any evidence produced by
 16 any ALEC in Florida, that a problem exists with NXXs that justify the
 17 BellSouth resources to develop this measure.

1 Q. AT PAGE 10, MS. EMCH ALLEGES THE NEED FOR APPROPRIATE
2 LEVELS OF DISAGGREGATION IN ALL THESE AREAS: ALEC,
3 PRODUCT, ORDERING ACTIVITY, GEORGRAPHIC SCOPE, VOLUME,
4 INTERFACE TYPE AND REASON FOR HELD ORDER. HOW DO YOU
5 RESPOND?

6
7 A. BellSouth's SQM already provides disaggregation for all the categories,
8 delineated in the parenthesis above, cited by Ms. Emch. BellSouth is
9 confused as to why Ms. Emch devoted 5 pages of testimony describing
10 disaggregation that BellSouth already complies with. The 1996 Act
11 requires BellSouth to produce Performance Measurements that permit
12 regulatory bodies to monitor non-discriminatory access. It was not the
13 intent of the Act or the FCC to have measurements for each and every
14 process or subprocess, for each and every product, at the lowest
15 geographic level, each month. The FCC provided guidance on the
16 number of measures in the NPRM when it stated that the "requirement for
17 performance measurements should balance the goal of detecting
18 discrimination with the goal of minimizing the burden on the local
19 exchange carrier." (CC Docket 98-56, Para 36)

20
21 Q. ON PAGE 10 OF HER TESTIMONY, MS. EMCH DESCRIBES WHY IT IS
22 IMPORTANT TO DISAGGREGATE BY INDIVIDUAL ALEC. THEN ON
23 PAGE 11 SHE STATES THAT BELLSOUTH FAILS TO PROVIDE ALEC
24 SPECIFIC DATA ON ITS OSS QUERY RESONSE TIME
25 MEASUREMENT. WOULD YOU CARE TO RESPOND?

1 A. Yes. BellSouth agrees with Ms. Emch that, whenever appropriate,
2 BellSouth should disaggregate its measurements by individual ALEC. In
3 fact, BellSouth does exactly that each and every month and posts this
4 ALEC specific data on a secure, password protected web site. However,
5 Ms. Emch's example of OSS Query Response Time is an inappropriate
6 example. The OSSs that generate this measurement are regional OSSs
7 that make no distinction as to the originator of the query. All queries,
8 whether ALEC or BellSouth, Florida or Georgia (or any other state), are
9 treated exactly the same. The key is "how long is the response interval"
10 and BellSouth's measurement demonstrates those results.

11

12 Q. ON PAGES 11-12, MS. EMCH PROPOSES LEVELS OF PRODUCT
13 DISAGGREGATION. ARE THE LEVELS OF PRODUCT
14 DISAGGREGATION INCLUDED IN THE BELL SOUTH SQM
15 APPROPRIATE?

16

17 A. Yes. The 1996 Act requires BellSouth to produce Performance
18 Measurements that permit regulatory bodies to monitor non-discriminatory
19 access. It was not the intent of the Act or the FCC to have measurements
20 for each and every process or sub-process, for each and every product, at
21 the lowest geographic level, each month. The FCC provided guidance on
22 the number of measures in the NPRM when it stated that the "requirement
23 for performance measurements should be to balance the goal of detecting
24 discrimination with the goal of minimizing the burden on the local
25 exchange carrier." (CC Docket 98-56, Para 36) Furthermore, BellSouth

1 reports on approximately 8,000 performance measurement results each
2 month at the state level. Additional product disaggregation will result in
3 even more numbers. In considering additional product disaggregation
4 and/or new measurements, the Commission must consider if even more
5 results will clarify or further confuse the Commission's ability to detect
6 non-discriminatory access. Interestingly, those additional levels of product
7 disaggregation, proposed by Ms. Emch on page 12 of her testimony, are
8 already included in BellSouth's SQM product disaggregation.

9
10 Q. AS PROPOSED BY MS. EMCH ON PAGE 13 OF HER TESTIMONY, IS
11 DISAGGREGATION BY ORDERING ACTIVITY NECESSARY?

12
13 A. No. Although BellSouth's SQMs already report separately on Local
14 Number Portability, as suggested by Ms. Emch, to further disaggregate by
15 type of service order, e.g. new installations and migrations with and
16 without changes, is unnecessary. BellSouth furnishes the ALECs with the
17 raw data for it's provisioning measurements every month. If WorldCom
18 wants to further disaggregate provisioning measurements by type of order,
19 they have the necessary data to do just that. It is unnecessary to burden
20 this Commission and all other ALECs with the additional volume of data
21 created by ordering BellSouth to routinely produce this level of
22 disaggregation.

23
24 Q. ON PAGES 13-14 OF HER TESTIMONY, MS. EMCH ASSERTS THAT
25 BELL SOUTH ONLY PROVIDES REGIONAL DATA ON CERTAIN

1 MEASUREMENTS AND THAT "AT A MINIMUM, BELLSOUTH SHOULD
2 BE REQUIRED TO PROVE THAT ITS SYSTEMS AND PROCESS FOR
3 THESE MEASURES ARE CENTRALIZED AND TRULY IDENTICAL FOR
4 EACH STATE". HOW DO YOU RESPOND?

5

6 A. BellSouth has always maintained that certain of its OSSs are regional
7 systems and incapable of producing state specific data. Nor is it
8 necessary for these OSSs to produce state specific data since there is no
9 state specific distinction built into these OSSs. All parties are treated
10 equally by design. Although there is currently a validated third party OSS
11 test underway in Georgia, and another about to begin here in Florida, is it
12 truly necessary to require the third party tester to validate that BellSouth is
13 telling the truth regarding it's regional OSSs?

14

15 Q. WHAT IS BELLSOUTH'S POSITION ON GEOGRAPHIC
16 DISAGGREGATION BELOW THE STATE LEVEL, E.G. MSA?

17

18 A. As I previously testified, the 1996 Act requires BellSouth to produce
19 Performance Measurements that permit regulatory bodies to monitor non-
20 discriminatory access. It was not the intent of the Act or the FCC to have
21 measurements for each and every process or sub-process, for each and
22 every product, at the lowest geographic level, each month.

23

24 BellSouth reports on approximately 8,000 performance measurement
25 results each month at the state level. These results would, at a minimum,

1 triple if reporting were done at the MSA level. In considering additional
2 geographic disaggregation below the state level, the Commission must
3 consider if even more results will clarify or further confuse the
4 Commission's ability to detect non-discriminatory access.
5

6 Q. IN RESPONSE TO MS. EMCH'S ALLEGATIONS ON PAGES 14-15
7 REGARDING DISAGGREGATION BASED ON VOLUME CATEGORY,
8 INTERFACE TYPE AND REASON FOR HELD ORDER, HOW DO YOU
9 RESPOND?
10

11 A. BellSouth's SQM already disaggregates by volume category, interface
12 type and reason for held orders. I fail to understand why this has been
13 raised as an issue in this proceeding.
14

15 Q. ON PAGES 15-16, MS. EMCH TESTIFIED ABOUT WORLDCOM'S
16 APPROACH TO ANALOGS, BENCHMARKS AND STANDARDS. DO
17 YOU AGREE?
18

19 A. BellSouth agrees with Ms. Emch regarding the necessity for analogs,
20 benchmarks and standards. However, BellSouth does not agree that it is
21 appropriate to use only benchmarks. BellSouth has proposed a set of
22 Retail Analogs and Benchmarks based on an examination of data
23 produced over the past two years. Most measures are based on
24 proposed retail analogs. BellSouth's position evolved during the Louisiana
25 workshops from proposing retail analogs only for resale products to a

1 comprehensive proposal offering a retail analog or benchmark for almost
2 every measure. BellSouth believes that appropriate analogs or
3 benchmarks must be based on data produced by the processes in
4 BellSouth. These analogs and/or benchmarks fairly balance the interest
5 of the ALECs, the Commission and BellSouth. Therefore, BellSouth
6 strongly recommends that the BellSouth proposed analogs and
7 benchmarks become the performance standards adopted by this
8 Commission.

9

10 Q. DO YOU CONCUR WITH MS. EMCH'S TESTIMONY REGARDING
11 STATISTICAL METHODOLOGY ON PAGES 17-18?

12

13 A. No. Statistical testing should only be required in assessing the
14 performance of the key measurements included in the BellSouth VSEEM
15 plan. It is not necessary to conduct statistical testing on other
16 performance measurement data since disparate treatment would be
17 captured in the set of VSEEM measurements. For statistical testing of the
18 VSEEM measures, BellSouth urges this Commission to adopt the
19 alternative statistical method that evolved during the Louisiana
20 Workshops, the truncated z methodology. This methodology was jointly
21 developed by BellSouth statisticians and statisticians representing the
22 ALECs and is superior to the modified z methodology. Furthermore,
23 BellSouth believes that a statistical methodology should only be applied to
24 those measurements containing a retail analog that are included in the
25 BellSouth remedy plan, VSEEM III.

1 Q. DOES BELLSOUTH CONCUR WITH THE BASIC COMPONENTS OF A
2 REMEDY MODEL THAT MS. EMCH IDENTIFIES ON PAGE 18?

3

4 A. Yes

5

6 Q. DOES BELLSOUTH'S PROPOSED REMEDY PLAN, VSEEM III,
7 INCLUDE ALL THREE OF THESE COMPONENTS?

8

9 A. Yes. BellSouth strongly urges this Commission to adopt BellSouth's
10 proposed VSEEM III remedy plan if this Commission deems it necessary
11 to order a remedy plan as part of this proceeding.

12

13 Q. WHAT IS BELLSOUTH'S POSITION ON AUDITING PERFORMANCE
14 MEASUREMENTS?

15

16 A. BellSouth's Service Quality Measurements, Appendix C, sets forth
17 BellSouth's position on auditing performance measurements. This
18 position provides the Commission with sufficient auditing capability to
19 conclude that BellSouth is meeting its obligations under the Act. Under
20 WorldCom's proposal, given the number of ALECs with whom BellSouth
21 has interconnection agreements, BellSouth would potentially have to
22 conduct hundreds of audits each year, at significant cost. BellSouth's
23 proposal balances the need to provide ALECs with the ability to audit
24 performance data with the need to keep the process manageable,
25 efficient, and cost-effective.

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2

3 A. Yes.

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