

ORIGINAL

1                                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                                   REBUTTAL TESTIMONY OF DAVID P. SCOLLARD  
3                                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4                                   DOCKET NO. 000649-TP  
5                                   SEPTEMBER 7, 2000  
6

7 Q.    PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH  
8            BELLSOUTH TELECOMMUNICATIONS, INC.  
9

10 A.    I am David P. Scollard, Room 26D3, 600 N. 19th St., Birmingham, AL 35203.  
11            My current position is Manager, Wholesale Billing at BellSouth Billing, Inc., a  
12            wholly owned subsidiary of BellSouth Telecommunications, Inc.  
13

14 Q.    ARE YOU THE SAME DAVID SCOLLARD THAT FILED DIRECT  
15            TESTIMONY IN THIS PROCEEDING?  
16

17 A.    Yes.  
18

19 Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS  
20            PROCEEDING?  
21

22            My rebuttal testimony will respond to the direct testimony of MCI witnesses  
23            on issues 42, 45, 53, 75, 93 and 111.  
24

25 *Issue 42: Should MCI WorldCom be permitted to offer tandem services for switched*

1

DOCUMENT NUMBER-DATE

11122 SEP-78 006398  
FPSC-RECORDS/REPORTING

1 *access service?*

2

3 Q. ON PAGE 46 OF HIS DIRECT TESTIMONY MCI WITNESS MR. PRICE,  
4 STATES THAT BELLSOUTH'S POSITION ON THIS ISSUE IS THAT ALL  
5 ACCESS TRAFFIC MUST BE PROVIDED OVER ACCESS TRUNKS AND  
6 FACILITIES. WHAT BILLING PROBLEMS WOULD RESULT IF MCI  
7 INCLUDED ITS ACCESS TRAFFIC OVER LOCAL INTERCONNECTION  
8 FACILITIES RATHER THAN ACCESS FACILITIES?

9

10 A. Generally, the result would be that BellSouth would be unable to accurately  
11 bill MCI for the access traffic. Each type of interconnection facility carries  
12 with it unique characteristics with regard to the recording of billing data for  
13 calls going across that facility. In the case of access facilities, the usage records  
14 that are generated at the switch include the Carrier Identification Code (CIC) of  
15 the IXC. The CIC is used in the BellSouth billing systems to determine the  
16 carrier which is to be billed. If this traffic were sent across MCI's local  
17 trunking arrangements, BellSouth is forced to rely on internal billing tables to  
18 manufacture the needed information which is less accurate than the CIC  
19 information provided in an access switch recording. MCI's proposal on this  
20 issue clearly leads to inaccuracies in billing for this traffic.

21

22 Q. WOULD THERE BE ADDITIONAL BILLING PROBLEMS IF MCI  
23 INCLUDED NOT ONLY ITS TRAFFIC BUT ALSO THE TRAFFIC OF  
24 OTHER IXCs ON LOCAL INTERCONNECTION FACILITIES?

25

1 A. Yes. If MCI were to perform the tandem and transport functions for a number  
2 of carriers and send that traffic to BellSouth via MCI's local interconnection  
3 facilities, BellSouth would lose all ability to determine which entity it would  
4 be billing for the traffic. The reason for this is that the CIC, which identifies  
5 the carrier to be billed, is not available when a call is sent via local  
6 interconnection trunks and facilities. Therefore, since the CIC is not known,  
7 the correct carrier to be billed is not known and therefore bills created for MCI  
8 would not be accurate. The plain truth is that when MCI sends a call across its  
9 local interconnection trunks, it is recorded in BellSouth's network as just that –  
10 a call originated from MCI's local customer and sent to BellSouth. To mix  
11 other types of traffic on these same facilities produces inaccurate billing results  
12 because the facilities were never designed to adequately record for any other  
13 type of call.

14  
15 Q. ARE THESE SAME BILLING PROBLEMS SEEN WHEN ACCESS AND  
16 LOCAL TRAFFIC ARE MIXED ON AN ACCESS TRUNK SOMETIMES  
17 REFERRED TO AS A SUPERGROUP?

18  
19 A. Not entirely. The supergroup is an access facility used to carry traffic  
20 originating from or terminating to MCI's local customers. The usage  
21 recordings provide the appropriate CIC, when needed, to determine the  
22 appropriate carrier to bill for access traffic going across the trunk group.  
23 However, the supergroup does not carry aggregated access traffic as proposed  
24 by MCI and, therefore, the issue described above with determining the

25

1 appropriate carrier to bill for this aggregated access traffic would still be  
2 present.

3

4 ***Issue 45: How should third party local transit traffic be routed and billed by the***  
5 ***parties?***

6

7 Q. ON PAGE 49 OF HIS DIRECT TESTIMONY MR. PRICE STATES THAT  
8 MCI SHOULD BE ALLOWED TO ROUTE TRANSIT TRAFFIC TO THIRD  
9 PARTIES VIA ITS LOCAL INTERCONNECTION FACILITIES. WOULD  
10 THIS TYPE OF TRAFFIC ROUTING CAUSE BILLING ISSUES SIMILAR  
11 TO THOSE YOU DESCRIBED FOR ISSUE #42.

12

13 A. Yes. However in this case the issue is worse. In order to route the traffic in the  
14 manner proposed by MCI would require the use of facilities which would not  
15 produce any call records. The lack of a call record would not only preclude  
16 BellSouth from billing MCI for this traffic but would also keep BellSouth from  
17 providing meet point billing records to the third party as required in contracts  
18 with those carriers. If another CLEC were to propose this same traffic mix and  
19 MCI were the third party, I am confident that MCI would be complaining that  
20 BellSouth was not providing it with needed data to bill the originating carrier.  
21 As I stated earlier, when a local interconnection trunk or facility is used to  
22 route traffic from MCI to BellSouth, the usage records that result are designed  
23 to relay only that information – MCI routed a call from one of its end users to  
24 one of BellSouth's end users.

25

1 *Issue 53: Should call jurisdiction be based on the calling party number or on*  
2 *jurisdictional factors that represent averages?*

3

4 Q. ON PAGE 77 OF HIS DIRECT TESTIMONY, MR. PRICE STATES THAT  
5 BELLSOUTH'S POSITION ON THIS ISSUE IS THAT FACTORS  
6 SHOULD BE USED IN LIEU OF CPN TO DETERMINE THE  
7 JURISDICTION OF A CALL. IS THIS A COMPLETE DESCRIPTION OF  
8 BELLSOUTH'S POSITION?

9

10 A. No. Like MCI, BellSouth is interested in insuring that billing between the  
11 parties is as accurate as possible. However, at this time, for a number of  
12 reasons, local carriers cannot eliminate the development and exchange of  
13 factors by using the CPN. First, many providers, including MCI, many times  
14 do not provide CPN when calls are routed to BellSouth . Second, even when  
15 the information is provided the switch software employed by BellSouth and  
16 other providers does not record this information. Therefore, it is impossible to  
17 use the CPN to bill each call to MCI. What BellSouth feels the CPN can be  
18 used for, however, is as an audit tool to verify that the factors supplied by MCI  
19 fairly represent the traffic sent by MCI. While the data is not present on billing  
20 records in the switch, the SS7 messages which are generated as calls are sent to  
21 BellSouth can be studied and a factor audit could be performed.

22

23 *Issue 75: For end users served by INP should the end user or the end-user's local*  
24 *carrier be responsible for paying the terminating carrier for collect calls, third party*  
25 *billed calls or other operator assisted calls?*

1

2 Q. ON PAGE 82 OF HIS DIRECT TESTIMONY MCI WITNESS PRICE  
3 STATES THAT INDUSTRY PRACTICE IS FOR TOLL CARRIERS TO  
4 BILL INP END USERS DIRECTLY FOR COLLECT OR THIRD NUMBER  
5 BILLED CALLS. IS THIS TRUE?

6

7 A. No. As stated in my direct testimony, the industry mechanisms that support the  
8 billing of collect and third number billed calls were not redesigned to handle  
9 billing in the manner claimed by MCI. One of the reasons for this is that INP is  
10 a short term product. The fact that MCI can serve these types of customers  
11 using LNP, the permanent portability service, from all BellSouth switches in  
12 the entire state of Florida is testimony to the wisdom the industry used in  
13 deciding to leave the existing mechanisms unchanged. While it may be true, as  
14 Mr. Price states, that IXCs bill end users directly at times, it is not relevant to  
15 the types of calls addressed by this issue. The calls at issue here are calls that a  
16 local exchange company has carried on behalf of a customer of another local  
17 exchange company. In the industry, these calls are billed via message exchange  
18 processes between the companies and not directly to the end user. BellSouth's  
19 proposal complies with the arrangements and infrastructures designed by the  
20 industry.

21

22 ***Issue 93: By when must the parties bill for previously unbilled amounts? By when***  
23 ***must they submit bills to one another?***

24

25

1 Q. ON PAGE 85 OF HIS DIRECT TESTIMONY, MR. PRICE STATES THAT  
2 LIMITING THE BILLING OF PREVIOUSLY UNBILLED AMOUNTS TO  
3 ONE YEAR IS REASONABLE. DOES BELLSOUTH AGREE WITH THAT  
4 STATEMENT?

5  
6 A. Not entirely. BellSouth is committed to billing all charges in an accurate and  
7 timely manner. For the vast majority of cases, a one year limit is very  
8 reasonable. However, there are situations in which billing of charges that are  
9 more than one year old is also reasonable. For example, BellSouth is required  
10 to rely on usage records from a third party to bill MCI for jointly provided  
11 services. In these cases, there may be a substantial amount of time required to  
12 get these records and produce bills based on them. Additionally, there are cases  
13 where MCI provides information used as billing inputs. For example, MCI  
14 provides PIU and PLU factors and service order information that is used to bill  
15 for services provided. The MCI language does not make allowances for  
16 correcting past inaccuracies in this data or, for that matter, make allowances for  
17 any exceptional circumstances that may come up that would give rise to  
18 delayed billing. Finally, the proposed MCI language is silent on how long a  
19 previously billed charge can be disputed. This is the other side of the coin  
20 which BellSouth believes should be addressed if artificial limits such as the  
21 ones proposed by MCI are to be included in the agreement.

22

23 *Issue 111: What procedures should be followed for audits of billing records?*

24

25

1 Q. ON PAGE 108 OF HIS DIRECT TESTIMONY, MR. PRICE STATES THAT  
2 BELLSOUTH'S POSITION ON THIS ISSUE DOES NOT REQUIRE THAT  
3 CPN BE USED TO DEVELOP PLU FACTORS. IS THAT REQUIREMENT  
4 NECESSARY?

5

6 A. No. As stated in my direct testimony on this issue and in my testimony on  
7 Issue 53, there are many occasions where originating carriers do not provide  
8 the CPN for calls that their end users originate. For example, MCI does not  
9 provide this information for roughly half of the calls it originates in Florida.  
10 For this reason, BellSouth must rely on any and all techniques available to  
11 determine when a particular call sent from MCI is local or non-local. To  
12 restrict the wording to CPN would provide less accurate, not more accurate,  
13 factors. BellSouth's wording merely states that where the capability exists, any  
14 recording technology that can be used to determine the jurisdiction of the call  
15 could be used .

16

17 Q. ON PAGE 108 OF HIS TESTIMONY MR. PRICE GOES ON TO  
18 COMPLAIN THAT BELLSOUTH'S PROPOSAL COPIES THE AUDIT  
19 LANGUAGE IN EXISTANCE IN THE BELLSOUTH TARIFF AND  
20 ADAPTS IT FOR USE WITH THE PLU. WHAT IS BELLSOUTH'S  
21 REPLY?

22

23 A. It is incredible that MCI would complain about the use of processes that have  
24 been established and have worked well for a number of years and propose that  
25 a separate and distinct process be developed for use between the parties. If



1 MCI's proposal were actually adopted then two differing audit processes  
2 would be required adding complexity and cost to the operations of both  
3 companies. This does not make good business sense. BellSouth's proposal  
4 merely avoids the establishment of parallel audit processes and keeps both  
5 parties from performing multiple audits for the same purpose.

6

7 Q. ON PAGE 109 OF HIS TESTIMONY, MR. PRICE COMPLAINS THAT  
8 BELLSOUTH'S PROPOSAL INCLUDES LANGUAGE PERTAINING TO  
9 THE PERCENT INTERSTATE USAGE FACTORS. IS THIS IN ANY WAY  
10 SURPRISING?

11

12 A. No. Since MCI sends interstate toll, intrastate toll and local traffic across the  
13 facilities that it orders from BellSouth under the terms of this agreement all of  
14 the processes which impact what is to be billed for that traffic should be  
15 included. The PIU and PLU factors can not be applied separately. The PIU  
16 factor is applied to usage totals to determine the portion to which the PLU  
17 factor is applied. As such each should be described in the agreement.

18

19 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

20

21 A. Yes.

22

23

24

25