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00 OCT -5 PM 4:30

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RECORDS AND
REPORTING

October 5, 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. 000907-TP (Level 3 Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Ronald M. Pate, Cynthia K. Cox and W. 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 to the parties shown on the attached Certificate of Service.

Sincerely,

T. Michael Twomey
T. Michael Twomey

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

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CERTIFICATE OF SERVICE
Docket No. 000907-TP

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

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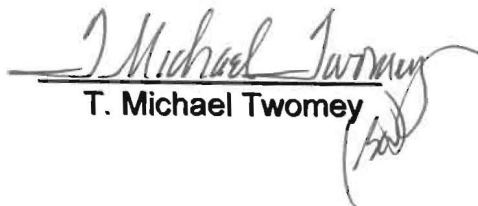
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T. Michael Twomey

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF RONALD M. PATE
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 000907-TP
5 OCTOBER 5, 2000
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH
8 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS:
9

10 A. My name is Ronald M. Pate. I am employed by BellSouth
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12 Services. In this position, I handle certain issues related to local
13 interconnection matters, primarily operations support systems ("OSS").
14 My business address is 675 West Peachtree Street, Atlanta, Georgia
15 30375.
16

17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
18

19 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
20 1973, with a Bachelor of Science Degree. In 1984, I received a Masters
21 of Business Administration from Georgia State University. My
22 professional career spans over twenty-five years of general
23 management experience in operations, logistics management, human
24 resources, sales and marketing. I joined BellSouth in 1987, and have
25 held various positions of increasing responsibility.

1

2 Q. HAVE YOU TESTIFIED PREVIOUSLY?

3

4 A. Yes. I have testified before the Public Service Commissions in
5 Alabama, Florida, Georgia, Louisiana, South Carolina, the Tennessee
6 Regulatory Authority and the North Carolina Utilities Commission.

7

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9

10 A. The purpose of my testimony is to provide BellSouth's position on Issue
11 No. 4 raised by Level 3 Communications, LLC ("Level 3") in its petition
12 for Arbitration filed with the Florida Public Service Commission
13 ("Commission") on July 21, 2000.

14

15 **Issue 4: Should each party be required to provide notice of errors within**
16 **(2) business days of receiving an Access Service Request**
17 **("ASR")?**

18

19 Q. WHAT DO YOU UNDERSTAND THAT LEVEL 3 IS REQUESTING IN
20 ISSUE 4?

21

22 A. It is my understanding that with respect to issue 4, Level 3 is concerned
23 with local interconnection trunks that it orders from BellSouth 's Local
24 Interconnection Switching Center via an ASR. Level 3, acknowledging
25 that occasional clerical and typographical errors occur on the ASRs,

1 wants BellSouth to agree to identify all errors on a given ASR(s) and to
2 provide Level 3 with a notice of errors within two (2) business days of
3 the receipt of the ASR. They propose the same when BellSouth sends
4 an ASR(s) to Level 3.

5

6 Q. WHAT IS BELLSOUTH'S POSITION ON ISSUE 4?

7

8 A. BellSouth will exercise its "best efforts" to identify all errors for local
9 interconnection trunks as part of a pre-order review of an ASR and
10 provide Level 3 notification of the error(s) within two (2) business days.
11 However, BellSouth cannot guarantee all errors will be identified since
12 the pre-order review involves manual review and as such, is subject to
13 human error. In addition, errors may be identified as part of pre-order
14 provisioning, described as the Circuit Administration Center ("CAC")
15 flow, which determines switch termination, facility/equipment availability
16 and overall due date. Errors may also be identified in the translations
17 information provided by the ALEC. Finally, errors may be identified as
18 part of mechanized service order generation. Errors in the pre-order
19 provisioning, translations provisioning and mechanized service order
20 generation, that must be resolved by Level 3, will be returned for
21 correction as the error(s) are identified.

22

23 Q. WHAT METHODS ARE AVAILABLE FOR THE SUBMISSION OF ASRs
24 FOR LOCAL INTERCONNECTION TRUNKS FOR LEVEL 3?

25

- 1 A. Level 3 and all other ALECs can submit ASRs by one of three methods:
2 1) Manually
3 2) Dial-up using TELIS/UNIX or TELIS PC mechanized ordering
4 system; and
5 3) Host-to-host arrangement via a direct facility

6

7 Q. WHAT IS LEVEL'S PREFERRED METHOD OF SUBMITTING ASRS
8 FOR LOCAL INTERCONNECTION TRUNKS?

9

10 A. Level 3 currently uses TELIS/UNIX to submit ASRs for local
11 interconnection trunks to BellSouth's Local Interconnection Switching
12 Center.

13

14 Q. PLEASE DESCRIBE TELIS.

15

16 A. TELIS is a program that supports electronic versions of the ASR form.
17 ALECs can use this program to fill out ASR records on line, and prepare
18 those records for electronic transmission to BellSouth's Exchange
19 Access Tracking and Control ("EXACT") mechanized ordering system.
20 TELIS resides on a UNIX based machine belonging to BellSouth.
21 TELIS screens look like paper ASR forms documented in the Access
22 Ordering Guidelines ("ASOG"). The system validates each ASR based
23 on industry standards contained in the ASOG. BellSouth administers
24 the TELIS system for its clients, the Access and ALEC customers.
25 BellSouth downloads all ASRs accepted in TELIS to its mainframe

1 ordering and tracking system, EXACT. EXACT returns all feedback files
2 generated by this process to the originating Access or ALEC customer.
3 Access or ALEC customers may use TELIS to: Create ASRs, issue
4 supplements, create ASR templates, verify information on ASRs, create
5 reports, process feedback reports, archive ASR data and other ASR
6 data management functions. TELIS is the preferred means of
7 generating ASRs to BellSouth by its small and medium sized Access or
8 ALEC customers.

9

10 Q. DOES BELLSOUTH HAVE ANY PLANS TO REPLACE TELIS?

11

12 A. Yes. Effective September 25, 2000, BellSouth introduced a Web-based
13 ASR ordering system, Common Access Front End ("CAFÉ"). The
14 application will allow Access and ALEC customers to create an ASR,
15 supplement a previously submitted ASR, and create templates for use
16 on frequently submitted orders.

17

18 The CAFÉ system will include pre validations of street address
19 information, Connecting Facility Assignment ("CFA"), and Network
20 Channel/Network Channel Interface/Secondary Network Channel
21 Interface codes ("NC/NCI/SECNCI"). It will perform many edits to assist
22 in preparation of an ASR.

23

24

25

1 Effective December 15, 2000, all TELIS users will be required to submit
2 ASRs via CAFÉ. BST will make training available on the new application
3 at no charge.

4

5 BellSouth users of TELIS and other CLECs were notified of these plans
6 via Carrier Notification SN91081900, dated August 25, 2000 and
7 available on the BellSouth Interconnection website:

8 <http://www.interconnection.bellsouth.com/carrier/>

9

10 Q. PLEASE DESCRIBE THE MAINFRAME SYSTEM EXACT.

11

12 A. The Exchange Access Control and Tracking system provides
13 mechanized order entry, control and tracking support for processing
14 ASRs. EXACT was developed in the 1980s to permit mechanized
15 processing of Interexchange Carrier ("IXC") service requests. EXACT is
16 a batch processing system that permits carriers to have a direct
17 connection or via dial-up connections. ASRs are loaded into EXACT via
18 these connections or entered by BellSouth personnel using the
19 manually submitted ASRs.

20

21 Q. YOU MENTIONED EARLIER THAT BELLSOUTH IS WILLING TO
22 EXERCISE ITS "BEST EFFORTS" TO IDENTIFY ALL ERRORS AS
23 PART OF THE PRE-ORDER REVIEW PROCESS. PLEASE
24 COMMENT.

25

1 A. The ASRs for local interconnection trunks received via EXACT are
2 edited for "fatal" errors which are returned to the ALEC. By fatal errors it
3 is meant that a required field in the ASR is not populated and/or not
4 properly formatted. If no fatal errors are observed the ASRs are
5 mechanically loaded into EXACT where each ASR is assigned to a work
6 list for processing. If the ASR was received via facsimile or mail, it is
7 entered into EXACT manually by the BellSouth service representative in
8 the Local Interconnection Switching Center. BellSouth's service
9 representative reviews the ASR screen in EXACT and evaluates any
10 errors (non-fatal) identified by the EXACT edit function. This activity
11 constitutes the pre-order screening review of the ASR. It should be
12 noted that during the pre-order screening review, if the service
13 representative can resolve the error he/she corrects the error. For
14 example, if the Access Carrier Terminal Location ("ACTL")¹ field is
15 improperly populated, the service representative may correct the data
16 without input from the ALEC. If the service representative cannot
17 resolve the error without the ALEC's research and response, the ASR is
18 returned to the ALEC for clarification with all known errors.

19
20 Q. DESCRIBE THE PROCESS STEP THAT TAKES PLACE AFTER THE
21 PRE-ORDER REVIEW OF AN ASR FOR LOCAL INTERCONNECTION
22 TRUNKS.

23

24

25 ¹ Uniquely identifies the ALEC's point-of-presence by an 11 character Common Language Location Identifier Code

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A. I refer to the following activities as pre-provisioning. Upon correction of all errors identified in the pre-order screening review, the service representative places the ASR in the Circuit Administration Center ("CAC") flow to allow the Circuit Capacity Management ("CCM"), Inter-Office Facility Planning Center ("IFCPC") and Circuit Provisioning Group ("CPG") personnel to determine switch termination and facility/equipment availability and overall due date capability. It is possible that the CCM, IFCPC or CPG may identify an error on the ASR upon review, that could not have been identified by the service representative in his/her review. For example, if the ALEC assigned a busy Connecting Facility Assignment², the error must be resolved by the ALEC. A non-busy CFA, assigned by the ALEC, must be obtained. The ASR clarification request is sent back to the ALEC for correction. Upon receipt of all corrections from the ALEC, the service representative reviews the ASR for correctness and once again places the ASR in the CAC flow process for processing.

Q. PLEASE DESCRIBE THE SERVICE ORDER GENERATION PROCESS STEP.

A. The final process step for an ASR is the mechanical service order generation. When the CAC flow processing is completed, the ASR is

² ALEC specified data that identifies the ALEC's carrier system and channel to be used.

1 returned to the service representative. If the ASR contains switch
2 translations information, the ASR is transmitted to BellSouth's Network
3 Infrastructure Support Center ("NISC") for switch translation activity. If
4 there are errors in the ALEC translations information or if additional
5 information is required, an ASR clarification will be transmitted to the
6 ALEC. Upon resolution of any translation errors or lack of information,
7 the translation request will be processed. Completion of this process
8 allows EXACT to generate a service order to the Service Order
9 Communications System ("SOCS") for further provisioning by the
10 BellSouth legacy systems.

11

12 Q. LEVEL 3's PETITION ON PAGE 14, PARAGRAPH 23 STATES
13 "...SINCE BELLSOUTH NEEDS TO PROVIDE A FIRM ORDER
14 CONFIRMATION OF A TRUNK ORDER WITHIN FOUR BUSINESS
15 DAYS PURSUANT TO THIS SECTION IN ATTACHMENT 3, ASKING
16 BELLSOUTH TO PROVIDE NOTICE OF ERRORS IN EACH ASR
17 WITHIN TWO (2) BUSINESS DAYS OF RECEIVING THE ASR
18 SHOULD NOT BE BURDENSOME." PLEASE COMMENT.

19

20 A. Level 3's comment misrepresents the requirement to provide a Firm
21 Order Confirmation ("FOC") within four (4) business days. Attachment
22 3, Paragraph 2.9 is addressing orders for interconnection trunk group
23 augmentations only, and not orders for new trunk groups. Augmentation
24 orders are additions to existing trunk groups. Therefore, the activities
25 described earlier in my testimony during the pre-provisioning process

1 step are not as extensive. This results in a shortened interval which
2 permits BellSouth to meet a 4-day FOC interval. It is important to
3 emphasize that the FOC interval is based on an error free ASR. That is,
4 BellSouth has agreed to a 4 day interval only where the ASR contains
5 correct and complete information.

6

7 Q. IS IT FEASIBLE TO EXPECT BELL SOUTH TO IDENTIFY ALL
8 ERRORS ON AN ASR AND RETURN IN 2 BUSINESS DAYS?

9

10 A. No. As described earlier, there are three different steps in processing an
11 ASR for local interconnection trunks: 1) pre-order review, 2) pre-
12 provisioning, and 3) service order generation. These steps are
13 sequential and as such are not subject to a 2-day interval.

14

15 Q. WHAT SUPPORT DOES BELL SOUTH PROVIDE LEVEL 3
16 REGARDING THE SUBMISSION OF ASRs?

17

18 A. BellSouth has developed an extensive 3-day training course on ASRs
19 for local interconnection trunks. The course is targeted for ALECs to
20 assist in the training and development of their representatives. The
21 course offering is "ASRs For Ordering Local Interconnection Trunking".
22 Course content and enrollment information is available on the BellSouth
23 Interconnection website:

24 <http://www.interconnection.bellsouth.com/training/announce.html>.

25

1 Additionally, ALECs may request BellSouth on-site or telephone support
2 for the TELIS and/or CAFÉ systems by contacting their BellSouth
3 Account representative.

4

5 Q. WHAT IS LEVEL 3's AND OTHER ALECs RESPONSIBILITY
6 REGARDING THE SUBMISSION OF ASRs?

7

8 A. Level 3 and other ALECs are responsible for submitting accurate and
9 complete ASRs for local interconnection trunks. BellSouth's ability to
10 process and provision service requests in a timely manner is a direct
11 function of Level 3's preparing a complete and accurate ASR. Errors
12 delay both the delivery of the Firm Order Confirmations and BellSouth's
13 ability to meet Level 3's desired due dates for local interconnection
14 trunks.

15

16 Q. WILL BELL SOUTH EXERCISE ITS "BEST EFFORTS" TO RETURN
17 ALL ERRORS TO LEVEL 3 FOR ASRs ORDERING LOCAL
18 INTERCONNECTION TRUNKS WITHIN 2 BUSINESS DAYS?

19

20 A. Yes, but only for the process step described earlier as the pre-order
21 review. After receiving Level 3's ASR for local interconnection trunks
22 submitted to the BellSouth's Local Interconnection Switching Center,
23 BellSouth will exercise its "best efforts" to review the ASR for
24 completeness and accuracy and return errors to Level 3 within 2
25 business days.

1

2 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

3

4 A. Yes.

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