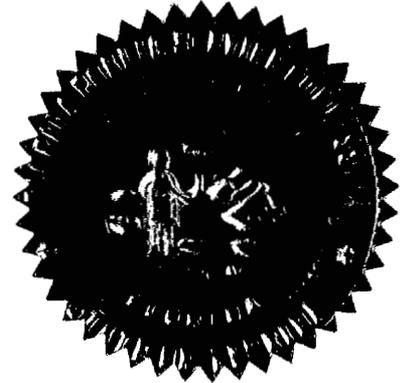


BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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: In the Matter of :
:
: PETITION BY MCIMETRO ACCESS :
: TRANSMISSION SERVICES, LLC AND MCI :
: WORLDCOM COMMUNICATIONS, INC. FOR :
: ARBITRATIONS OF CERTAIN TERMS AND :
: CONDITIONS OF A PROPOSED AGREEMENT :
: WITH BELL SOUTH TELECOMMUNICATIONS, :
: INC. CONCERNING INTERCONNECTION AND :
: RESALE UNDER THE TELECOMMUNICATIONS :
: ACT OF 1996. :

DOCKET NO. 000649-TP



*
* ELECTRONIC VERSIONS OF THIS TRANSCRIPT *
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* THE OFFICIAL TRANSCRIPT OF THE HEARING *
* AND DO NOT INCLUDE PREFILED TESTIMONY. *
*

VOLUME 7

Pages 1048 through 1177

PROCEEDINGS: HEARING

BEFORE: COMMISSIONER E. LEON JACOBS, JR.
COMMISSIONER LILA A. JABER
COMMISSIONER BRAULIO L. BAEZ

DATE: Friday, October 6, 2000

TIME: Commenced at 9:00 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
FPSC Division of Records & Reporting
Chief, Bureau of Reporting

APPEARANCES: (As heretofore noted.)

DOCUMENT NUMBER-DATE

13414 OCT 20 8

I N D E X

WITNESSES

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4	RONALD M. PATE	
5	Direct Examination by Mr. Goggin	1051
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EXHIBITS

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P R O C E E D I N G S

1
2 (Transcript continues in sequence from
3 Volume 6.)

4 COMMISSIONER JACOBS: Back on the record,
5 and -- well, we finished Ms. Carter (sic), didn't we?

6 CHAIRMAN DEASON: Yes.

7 COMMISSIONER JACOBS: So we are ready to go,
8 then. Your first witness.

9 MR. GOGGIN: Commissioner Jacobs, we call Ronald
10 Pate to the stand.

11 COMMISSIONER JACOBS: Okay.

12 RONALD M. PATE

13 was called as a witness on behalf of BellSouth
14 Telecommunications and, having been duly sworn, testified
15 as follows:

D I R E C T E X A M I N A T I O N

16
17 BY MR. GOGGIN:

18 Q Mr. Pate, could you state your full name and
19 business address for the record, please?

20 A Yes. My name is Ronald M. Pate. The address is
21 675 West Peachtree, Atlanta, Georgia.

22 Q And were you sworn in at the start of the
23 hearing on Wednesday?

24 A Yes, I was.

25 Q Did you cause direct testimony to be filed on .

1 August 17, 2000 consisting of 35 pages?

2 A Yes, I did.

3 Q Do you have any changes or corrections to that
4 testimony?

5 A No, I do not.

6 Q If I were to ask you the same questions today
7 that were put to you in that testimony, would your answers
8 be the same?

9 A Yes, they would.

10 Q And did you file four exhibits labelled RMP-1
11 through 4 with that direct testimony?

12 A Yes, I did.

13 Q Do you have any changes or corrections to the
14 exhibits?

15 A No, I do not.

16 Q And did you cause on September 7, 2000 rebuttal
17 testimony to be filed consisting of 18 pages?

18 A Yes.

19 Q Do you have any changes or corrections to the
20 rebuttal testimony?

21 A No, I do not.

22 Q Okay. If I were to ask you all the same
23 questions today that were put to you in the rebuttal
24 testimony, would your answers be the same?

25 A Yes, they would.

1 MR. GOGGIN: Commissioners, we ask that the
2 direct and rebuttal testimony of Mr. Pate be admitted into
3 the record.

4 COMMISSIONER JACOBS: Without objection, show
5 the direct and rebuttal testimony entered as though read.

6 MR. GOGGIN: Commissioners, we also ask that the
7 four exhibits attached to Mr. Pate's direct prefiled
8 testimony be marked as a composite exhibit, and I believe
9 that would be Exhibit Number 31.

10 COMMISSIONER JACOBS: That's correct. Show that
11 marked.

12 (Exhibit 31 marked for identification.)
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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF RONALD M. PATE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000649-TP
August 17, 2000

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

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

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing. I joined BellSouth in 1987, and have 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 Alabama,
5 Florida, Georgia, Louisiana, South Carolina, the Tennessee Regulatory
6 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 Nos.
11 1, 78, 80, 81, 83, 89, 90, 91 and 96A raised by MCImetro Access Transmission
12 Services, LLC ("MCI") in its Petition for Arbitration filed with the Florida
13 Public Commission ("Commission") on May 26, 2000.

14

15 *Issue 1: Should the electronically ordered NRC apply in the event an order is*
16 *submitted manually when electronic interfaces are not available or not*
17 *functioning within specified standards or parameters?*

18

19 Q. WHICH PARTS OF THE ABOVE ISSUE ARE YOU ADDRESSING?

20

21 A. My testimony addresses BellSouth's obligation to provide nondiscriminatory
22 access to BellSouth's OSS. Ms. Cindy Cox provides BellSouth's position on
23 Issue #1 in her testimony.

24

25

1 Q. PAGE 5, PARAGRAPH 10 OF MCI'S PETITION STATES THAT
2 "BELLSOUTH IS UNREASONABLE AND DISCRIMINATORY, 47 U.S.C.
3 251 (c) (3), AND DOES NOT PROVIDE PARITY WHEN IT PROVIDES
4 AND CHARGES ALTERNATIVE LOCAL EXCHANGE CARRIERS
5 ("ALECS") FOR A MANUAL PROCESS, WITHOUT MAKING AN
6 ELECTRONIC PROCESS AVAILABLE, WHEN BELLSOUTH PROVIDES
7 AN ELECTRONIC PROCESS FOR ITS RETAIL BUSINESS." DO YOU
8 AGREE?

9
10 A. No. MCI does not offer any specific information to support its suggestion that
11 BellSouth is acting in a discriminatory manner, and I disagree strongly with
12 this claim. I am not aware of any situation of the type described by MCI on
13 page 5, paragraph 10 of its petition, where BellSouth" does not provide parity
14 when it provides and charges alternative local exchange carriers ("ALECs") for
15 a manual process, without making an electronic process available, when
16 BellSouth provides an electronic process for its retail business." Thus, the
17 issue referenced by MCI is not an issue at all.

18 Q. WHAT IS THE PRIMARY TYPE OF SERVICE REQUESTS THAT MCI
19 SENDS TO BELLSOUTH FOR WHICH THEY PAY MANUAL
20 CHARGES?

21
22 A. At present, it appears that MCI is submitting Local Service Requests ("LSRs")
23 for primarily Unbundled Network Elements ("UNEs") in Florida and choosing
24 to send most of these LSRs manually. Such service requests incur manual
25 ordering charges. It also appears that many of the LSRs that MCI is submitting

1 manually could be submitted electronically through one of the following
2 electronic interfaces offered by BellSouth: Local Exchange Navigation System
3 (“LENS”), Telecommunications Access Gateway (“TAG”), RoboTAG™ and
4 Electronic Data Interchange (“EDI”). LSRs submitted through one of these
5 interfaces would be assessed an electronic ordering charge.

6
7 LSRs for most complex services must be submitted manually. However, the
8 manual processes BellSouth uses for complex resold services offered to MCI
9 are accomplished in substantially the same time and manner as the processes
10 used for BellSouth’s retail complex services. BellSouth retail service orders for
11 similar complex retail services also utilize manual processes. Because the
12 same manual processes are in place for both MCI and BellSouth retail orders,
13 the processes are nondiscriminatory and competitively neutral.

14
15 For certain resale and UNE services that must be submitted manually,
16 BellSouth complies with the FCC requirement expressed in paragraph 87 of its
17 Order on BellSouth's second 271 application for Louisiana, where the FCC
18 reiterated its requirement as it had stated in the Ameritech Michigan Order and
19 in the Local Competition First Report and Order “that a BOC must offer access
20 to competing carriers that is analogous to OSS functions that a BOC provides
21 to itself. Access to OSS functions must be offered in ‘substantially the same
22 time and manner’ as the BOC. For those OSS functions that have no retail
23 analogue . . . a BOC must offer access sufficient to allow an efficient
24 competitor a meaningful opportunity to compete.” Since BellSouth complies
25 with applicable FCC requirements with respect to its OSS, it is not clear why

1 MCI believes that it should be permitted to avoid paying manual ordering
2 charges when MCI submits an LSR manually.

3

4 Q. DID THE FCC DEFINE NON-DISCRIMINATORY ACCESS TO
5 OPERATIONS SUPPORT SYSTEMS?

6 A. Yes. The Federal Communications Commission (“FCC’s”) August 8, 1996
7 Order in Docket No. 96-98 (“FCC August 8 Order”), at paragraph 312,
8 indicates generally that the quality of access to unbundled network elements
9 must be comparable among competitive (alternative) local exchange carriers
10 (“ALECs”), and between ALECs and BellSouth. More specifically, paragraph
11 518 of the FCC’s August 8 Order states that “if competing carriers are unable
12 to perform the functions of pre-ordering, ordering, provisioning, maintenance
13 and repair, and billing for network elements and resale services **in**
14 **substantially the same time and manner** that an incumbent can for itself,
15 competing carriers will be severely disadvantaged, if not precluded altogether,
16 from fairly competing. Thus providing non-discriminatory access to these
17 support system functions, which would include access to the information such
18 systems contain, is vital to creating opportunities for meaningful competition.”
19 (Emphasis added.)

20

21 Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

22

23 A. Yes. In paragraph 87 of its Order on BellSouth's second 271 application for
24 Louisiana, the FCC reiterated its requirement as it had stated in the Ameritech
25 Michigan Order and in the Local Competition First Report and Order “that a

1 BOC must offer access to competing carriers that is analogous to OSS
2 functions that a BOC provides to itself. Access to OSS functions must be
3 offered in 'substantially the same time and manner' as the BOC. For those
4 OSS functions that have no retail analogue . . . a BOC must offer access
5 sufficient to allow an efficient competitor a meaningful opportunity to
6 compete.”

7

8 Q. DOES BELLSOUTH PROVIDE ALECs NONDISCRIMINATORY ACCESS
9 TO ITS OSS?

10

11 A. Yes. BellSouth provides ALECs nondiscriminatory access to its OSS
12 functions for pre-ordering, ordering, provisioning, maintenance and repair, and
13 billing through robust and reliable manual and electronic interfaces. The
14 electronic interfaces are: Local Exchange Navigation System (“LENS”),
15 Telecommunications Access Gateway (“TAG”), RoboTAG™, Electronic Data
16 Interchange (“EDI”), Trouble Analysis and Facilitation Interface (“TAFI”), and
17 Electronic Communication Trouble Administration (“ECTA”). Additionally,
18 BellSouth's OSS interfaces for ALECs are operated and available on a regional
19 basis and so the same access is available everywhere, not just in Florida.

20

21

22 Q. DOES NON-DISCRIMINATORY ACCESS MEAN ALL SERVICES MUST
23 BE ORDERED ELECTRONICALLY?

24

25

- 1 A. No. Nondiscriminatory access does not require that all information and
2 functions for ALECs must be electronic and involve no manual handling.
3 Many of BellSouth's retail services, primarily complex services, involve
4 substantial manual handling by BellSouth account teams for BellSouth's own
5 retail customers. Nondiscriminatory access to certain functions for ALECs
6 also legitimately may involve manual processes for these same functions.
7 These processes are in compliance with the Act and the FCC's rules.
8
- 9 Q. PLEASE EXPLAIN WHEN BELLSOUTH APPLIES THE ELECTRONIC
10 AND THE MANUAL ORDERING CHARGES.
11
- 12 A. BellSouth charges the electronic charge for LSRs that are submitted over any
13 of BellSouth's electronic interfaces. BellSouth applies the manual ordering
14 charge for LSRs submitted manually to BellSouth's Local Carrier Service
15 Center ("LCSC") via e-mail, facsimile, U.S. Mail, or similar method.
16
- 17 Q. WILL MCI PAY ELECTRONIC ORDERING CHARGES FOR CERTAIN
18 MANUALLY SUBMITTED ORDERS?
19
- 20 A. Yes. BellSouth has agreed to charge MCI electronic ordering charges for
21 complete and accurate LSRs that MCI must submit manually when
22 BellSouth's existing electronic interface utilized by MCI are unavailable for
23 reasons other than scheduled maintenance, provided the down time does not
24 occur outside the scheduled maintenance window or for other reasonable
25 scheduled activities for which reasonable advance notification is provided by

1 BellSouth, and provided the activities do not occur outside the scheduled
2 window. However, MCI should not be permitted to avoid manual charges in a
3 wholesale fashion as MCI seeks to do.

4

5 *Issue 78: How should credit information be provided to MCIW?*

6

7 Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF MCI'S POSITION ON
8 THIS ISSUE?

9

10 A. Based on my understanding, MCI's position on this issue is that the parties
11 should provide credit information to a mutually agreed upon third party credit
12 reporting agency.

13

14 Q. HAS MCI PREVIOUSLY REQUESTED ACCESS TO BELLSOUTH'S
15 CUSTOMER SERVICE RECORDS AND GIVEN ACCESS TO CREDIT
16 HISTORY INFORMATION WITHIN FLORIDA?

17

18 A. Yes. In Docket 960846-TP, MCI requested that BellSouth provide access to
19 credit information contained on its CSRs, and the Commission agreed with this
20 request. At the direction of the Commission, BellSouth developed its Encore
21 Electronic Interface Release 1.0, in October 1997 in order to provide MCI with
22 access to Customer credit information on the CSRs. Since that date, MCI has
23 had electronic access to this information.

24

25 Q. WHAT IS MCI NOW ASKING FOR RELATIVE TO CREDIT HISTORY?

1

2 A. Instead of wanting customer credit information on BellSouth's CSRs, MCI
3 now wants BellSouth to provide credit information to a mutually agreed upon
4 third party credit reporting agency. In MCI's proposed Interconnection
5 Agreement, Attachment 8, 1.7.8.7 it proposes the National Consumer
6 Telecommunications Data Exchange ("NCTDE"). MCI fails to adequately
7 explain why the existing credit history information available in Florida from
8 BellSouth's CSRs is not sufficient for MCI's needs, particularly when this is
9 the form of access MCI requested three years ago.

10

11 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

12

13 A. BellSouth's position on this issue is that MCI should obtain credit information
14 in Florida utilizing the information presented on the Customer Service Record
15 for any BellSouth account which has not been restricted by the end user, via
16 BellSouth's pre-ordering functionalities, LENS, TAG or RoboTAG™.

17

18 Q. WHAT CREDIT HISTORY INFORMATION IS AVAILABLE TO MCI VIA
19 LENS, TAG or RoboTAG™ FOR MCI'S END USERS OR FOR ANY
20 BELLSOUTH ACCOUNT WHICH HAS NOT BEEN RESTRICTED BY
21 THE END USER?

22

23 A. BellSouth currently provides MCI with electronic access to a customer's credit
24 history consisting of a Credit Class code, twelve months Treatment History
25 codes, and twelve Months Returned Check History codes.

1

2 Q. DO YOU AGREE WITH MCI'S ATTACHMENT 8, PAGES 10-11 AS IT
3 RELATES TO CUSTOMER PAYMENT HISTORY FOR UNPAID CLOSED
4 ACCOUNTS ("UCAs")?

5

6 A. No. The information that MCI wants BellSouth to provide through the
7 NCTDE goes beyond that which BellSouth routinely provides through
8 NCTDE, and MCI has not explained why this additional information is even
9 necessary.

10

11 BellSouth is a member of the Board of Directors of the NCTDE and has
12 contributed data on BellSouth residential customer UCAs for the period
13 November 1997 through the present date. BellSouth contributes weekly
14 updates to NCTDE on residential customer UCAs. This information includes:

15 Customer name and address

16 Customer Social Security Number

17 BellSouth Account number

18 Installation and Disconnect dates

19 Balance Due

20 Status Information: Such as updated payment information and reason
21 for disconnect

22

23 BellSouth contributes all of the NCTDE required data to Equifax, which
24 formats the information for NCTDE. The additional information MCI seeks –

25

1 previous phone number and toll service history – is not data required by
2 NCTDE and is not provided by BellSouth.

3

4 Q. CAN MCI OBTAIN ACCESS TO THE INFORMATION BELLSOUTH
5 CONTRIBUTES TO NCTDE?

6

7 A. Yes. MCI, like any other ALEC, may choose to participate in the NCTDE, in
8 which case it can readily obtain all of the credit information contributed by
9 BellSouth on its residential customer UCAs.

10

11

12 *Issue 80: Should BellSouth be required to provide an application to application*
13 *access service order inquiry process?*

14

15 Q. WHAT DO YOU UNDERSTAND MCI IS REQUESTING REGARDING
16 ISSUE 80?

17

18 A. My understanding is that MCI is requesting BellSouth to develop an
19 application-to-application electronic interface to process service inquiries (pre-
20 ordering) for its access service requirements. MCI indicates that pre-order
21 information on Unbundled Network Elements (“UNEs”) is required
22 electronically via this process.

23

24 Q. WHAT IS BELLSOUTH’S POSITION ON THIS ISSUE?

25

1 A. BellSouth should not be required to provide an application-to-application
2 access service order inquiry process. BellSouth currently provides non-
3 discriminatory access to its OSS for pre-ordering for network elements and
4 resale services pursuant to Section 251 of the Telecommunications Act of 1966
5 (“Act”). Access services are not part of BellSouth’s obligations under the Act
6 and MCI should not be permitted to use this arbitration to try to enhance its
7 interexchange service offerings.

8
9 Q. DOES MCI NEED A NEW INTERFACE FOR ACCESS SERVICE ORDER
10 INQUIRIES IN ORDER TO OBTAIN PRE-ORDERING INFORMATION
11 ELECTRONICALLY FOR UNBUNDLED NETWORK ELEMENTS, AS
12 DESCRIBED BY MCI ON PAGE 70 OF ITS PETITION?

13
14 A. No. MCI’s claim that MCI needs the Access Service Request (“ASR”)
15 interface in order “to obtain pre-order information electronically for UNEs...”
16 is wrong. The national standard for ordering UNEs and resale services is
17 through the submission of an LSR, not an ASR. BellSouth provides electronic
18 pre-ordering functionality for UNEs and resale services via LENS,
19 RoboTAG™, and TAG. Thus, the electronic pre-ordering functionality MCI
20 seeks is available through the LSR process

21
22 Q. MCI CLAIMS ON PAGE 70 OF ITS PETITION THAT MCI USES ASRs
23 “TO ORDER, AMONG OTHER THINGS, INTERCONNECTION TRUNKS
24 AND UNES FOR LOCAL SERVICE.” HOW DO YOU RESPOND?

25

1 A. While conceivably MCI could use an ASR to order certain UNEs, there is no
2 requirement that MCI do so. In fact, all UNEs offered by BellSouth can be
3 ordered via an LSR, which would give MCI the electronic pre-ordering
4 functionality it claims it needs to provide local service. Although
5 interconnection trunks are ordered via an ASR, interconnection trunks are used
6 to provide much more than local service and, in any event, are not “unbundled
7 network elements”. MCI has been using an ASR to order interconnection
8 trunks for its long distance services for years, and MCI’s request for an ASR
9 interface appears to be an effort to improve the manner in which MCI orders
10 access services, which is obviously beyond the scope of this proceeding.

11

12 Q. WHAT ORDERING SYSTEM HAS BEEN PROVIDED FOR SUBMITTING
13 ACCESS SERVICE REQUESTS?

14

15 A. BellSouth has provided the Exchange Access Control and Tracking
16 (“EXACT”) electronic ordering system for the provisioning of ASRs submitted
17 by interexchange carriers (“IXCs”). IXCs may submit ASRs directly to
18 EXACT or submit ASRs via a dial-up to the BellSouth TELIS Access
19 Ordering System that downloads ASRs to EXACT. Users of TELIS Access
20 Ordering System may access The Interexchange Carrier Reference (“ICREF”)
21 to obtain pre-ordering functions of address validations, check Network
22 Channel (“NC”) and Network channel Interface (“NCI”) codes, and to verify
23 busy Connecting Facility Assignments (“CFAs”). It is not clear why MCI
24 believes that BellSouth must enhance the pre-ordering capabilities for ASRs.

25

1

2 *Issue 81: Should BellSouth provide a service inquiry process for local services as a*
3 *preordering function?*

4

5 Q. PLEASE EXPLAIN YOUR UNDERSTANDING OF MCI'S REQUEST FOR
6 A LOCAL SERVICE INQUIRY ("SI") AS A PRE ORDERING FUNCTION.

7

8 A. My understanding of MCI's request is that MCI wants BellSouth
9 to make the SI process available as a preordering function on any local service
10 request. Further, the SI process would be applied at MCI's discretion and I
11 presume that MCI desires an electronic capability.

12

13 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

14

15 A. BellSouth currently provides a SI process for ALECs for local services when
16 appropriate. The SI process provided to MCI is accomplished in substantially
17 the same time and manner as BellSouth does for itself.

18

19 Q. DESCRIBE THE SI PROCESS AVAILABLE TO ALECs?

20

21 A. The availability of facilities on selected services for both ALECs and
22 BellSouth's Retail units is determined via the SI process. The ALEC initiates
23 this process by submitting a SI to its BellSouth Account Team ("AT") or the
24 Complex Resale Support Group ("CRSG") along with its Local Service
25 Request ("LSR"). If the ALEC desires to have BellSouth immediately order

1 the service once the SI is complete and compatible facilities are availability,
2 the ALEC submits a LSR and a SI to the AT/CRSG. This is referred to as a SI
3 with a firm order. The AT/CRSG sends the SI to the Service Activation Center
4 ("SAC") to determine if compatible facilities exist for the requested service
5 and if so, reserve the facilities for the ordering ALEC. The SAC returns the
6 completed SI form to the CRSG. If compatible facilities exist, the AT/CRSG
7 forwards the LSR to the Local Carrier Service Center ("LCSC") for order
8 issuance. If compatible facilities do not exist, the CRSG notifies the ALEC via
9 electronic mail.

10

11 Q. IS THE SI PROCESS APPLICABLE FOR ALL SERVICE REQUESTS
12 SUBMITTED BY ALECs?

13

14 A. No. The availability of facilities for simple services, some complex services
15 and some types of loops, such as 2-wire unbundled voice grade loops, is not
16 determined via the SI process for ALECs or BellSouth's Retail units. The
17 availability of facilities for these services is determined during the service
18 order provisioning process. The SI process is utilized only when it is necessary
19 to determine whether facilities are available that meet certain technical
20 requirements for the particular service(s) to be provided. Such an inquiry is
21 not necessary for the services mentioned above.

22

23 Q. HOW ARE AVAILABILITY OF FACILITIES DETERMINED FOR
24 SERVICES WHERE A SI IS NOT INITIATED?

25

1 A. Availability of facilities are determined as part of the provisioning cycle.
2 When a LSR submitted by a ALEC has successfully passed through the various
3 edits and formatting checks, the LSR is translated into a service order which
4 can be accepted by BellSouth's downstream legacy systems for provisioning of
5 the requested service. As an example, one such downstream system is the Loop
6 Facility Assignment Control System ("LFACS"). LFACS selects loop
7 facilities which serve the address(es) on the service order as a function of the
8 provisioning cycle.

9 .

10 Q. WHAT ARE BELLSOUTH'S 319 REMAND OBLIGATIONS REGARDING
11 LOOP QUALIFICATION?

12

13 A. It is my understanding that 47 C.F.R. §51.319 (g) requires BellSouth to make
14 available, as part of its duty to provide access to the pre-ordering function,
15 nondiscriminatory access to the same detailed information about the loop that
16 is available to BellSouth.

17

18 Q. HOW IS BELLSOUTH MEETING ITS OBLIGATIONS?

19

20 A. BellSouth has developed procedures to provide ALECs detailed loop make-up
21 information as a pre-ordering function via the SI process. This process is
22 available to any ALEC that is interested in incorporating these procedures into
23 their interconnection agreement. Additionally, BellSouth is developing an
24 electronic loop make-up data query to allow the ALECs to obtain loop make-
25 up information electronically. BellSouth began Beta testing of electronic

1 access to pre-order loop make-up information on July 31, 2000 with selected
2 ALECs. Once the Beta testing is completed, BellSouth will begin Service
3 Readiness Testing ("SRT") for interested ALECs. These processes will provide
4 sufficient information to allow the ALEC to make a decision about whether the
5 loop is capable of supporting the services and equipment the ALEC intends to
6 install prior to submitting a firm order for that loop.

7

8 Q. PLEASE DESCRIBE THE LOOP MAKE-UP SI PROCESS.

9

10 A. Loop make-up is defined as the physical characteristics of the loop facilities,
11 starting at the BellSouth Central Office listed in sequential order and ending at
12 the serving distribution terminal. Loop make-up consists of such things as
13 cable gauge and length, bridged taps, load coils, presence of Digital Loop
14 Carrier ("DLC") and other equipment that is part of the local loop facilities.

15

16 MCI completes BellSouth's Loop Make-up SI form ("form") filling in the
17 "Customer Information" section indicating if it wants the loop make-up by
18 telephone number or address. MCI submits the form to the BellSouth's
19 Account Team or Complex Resale Support Group ("CRSG"). The CRSG
20 forwards the form to the BellSouth's Outside Plant Engineering Service
21 Activation Center ("SAC").

22

23 If MCI indicates it wants the make-up by telephone number, the SAC will
24 return a specific make-up for the requested telephone number. If MCI indicates

25

1 it wants the make-up by address, the SAC will return a specific make-up for
2 the requested address.

3

4

5 Q. HAS THE FEDERAL COMMUNICATION COMMISSION (“FCC”)

6

7 ADDRESSED THIS ISSUE?

8

9 A. Yes. Paragraph 426 of the Federal Communication Commission’s (“FCC”)
10 Third Report and Order and Fourth Further Notice of Proposed Rulemaking
11 (“UNE Remand Order”) in CC Docket No. 96-98 and released on November 5,
12 1999, states that “this Commission should clarify that the pre-ordering function
13 includes access to loop qualification information. Loop qualification
14 information identifies the physical attributes of the loop plant (such as loop
15 length, the presence of analog load coils and bridge taps, and the presence and
16 type of Digital Loop Carrier) that enable carriers to determine whether the loop
17 is capable of supporting xDSL and other advanced technologies.”

18

19 The FCC further states in paragraph 427 that “an incumbent Local Exchange
20 Carrier (“LEC”) must provide the requesting carrier with nondiscriminatory
21 access to the same detailed information about the loop that is available to the
22 incumbent, so that the requesting carrier can make an independent judgment
23 about whether the loop is capable of supporting the advanced services
24 equipment the requesting carrier intends to install.”

25

1 BellSouth's current process of providing loop make-up via an SI as part of pre-
2 ordering is for compliance with this Order. In other words, loop make-up is
3 provided as a "front-end" pre-ordering function so that MCI can determine up-
4 front if compatible loop facilities exist for the intended service. Once this
5 determination is made, MCI then submits a LSR to order the loop.

6

7 Q. SHOULD BELLSOUTH BE REQUIRED TO PROVIDE ANY
8 ADDITIONAL SI PROCESS FOR LOCAL SERVICES?

9

10 A. No. BellSouth provides ALECs with access to the necessary information for
11 requesting services in substantially the same time and manner as BellSouth
12 provides its retail units. Therefore, BellSouth should not be required to
13 provide any other SI process particularly as part of the pre-ordering process.

14

15 ***Issue 83: Should BellSouth be required to provide downloads of the RSAG***
16 ***database without license agreements?***

17

18 Q. WHAT DO YOU UNDERSTAND THAT MCI IS REQUESTING OF
19 BELLSOUTH IN THE AREA OF RSAG DOWNLOADS?

20

21 A. My understanding of MCI's request is that MCI wants BellSouth to provide
22 database downloads of the BellSouth Regional Street Address Guide
23 ("RSAG") through a mutually agreeable electronic means, in a file format and
24 record layout defined to BellSouth. Further, BellSouth should provide updates
25 via subsequent downloads of the entire database, as requested by MCI, but no

1 more frequently than weekly. MCI feels that a License Agreement should not
2 be required.

3

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

5

6 A. BellSouth has agreed to provide MCI a download of the RSAG at MCI's
7 expense. However, MCI must execute a licensing agreement ensuring that
8 any download of the RSAG database will be used only for the functions of
9 pre-ordering and ordering of local services from BellSouth and making clear
10 that BellSouth does not warrant the information contained in the database.

11

12 Q. WHAT IS THE RSAG?

13

14 A. RSAG is a BellSouth database that contains street addresses validated to be
15 accurate with state and local governments. This information is used to ensure a
16 consistent and accurate address for the purposes of matching loop facilities
17 available to an end user customer address and for dispatching outside field
18 technicians. BellSouth provides to ALECs access to the RSAG database on a
19 per transaction basis, through the LENS and the TAG pre-ordering electronic
20 interfaces. After the end user provides a street address, in order to validate the
21 address, the BellSouth or ALEC service representative sends an inquiry to, and
22 receives a response from the RSAG data base. Since the RSAG database is
23 updated nightly the ALECs have access to the most current and up-to-date
24 information contained in the RSAG database. The RSAG database returns

25

1 information without preference to whether the request originated from a ALEC
2 or from BellSouth.

3

4 Q. IS BELLSOUTH WILLING TO PROVIDE MCI WITH A DOWNLOAD OF
5 RSAG IN ADDITION TO THE ELECTRONIC ACCESS CURRENTLY
6 AVAILABLE?

7

8 A. Yes. As stated previously, BellSouth has agreed to provide a download of the
9 RSAG database to MCI in accordance with the commission's order in Docket
10 No. 980281-TP. However, RSAG is an intellectual property database, which
11 is used in the pre-ordering and ordering functions of local exchange services.
12 Thus, it is reasonable for BellSouth to request execution of a licensing
13 agreement to protect its intellectual property.

14

15 MCI has informed BellSouth that they intend to share the information with
16 their affiliates for purposes other than the ordering of local services. As such,
17 MCI's request is beyond BellSouth's obligation under the 1996 Act, and
18 therefore the licensing agreement is appropriate.

19

20 Q. WHAT IS CONTAINED WITHIN THE LICENSING AGREEMENT?

21

22 A. The license agreement establishes the conditions under which the RSAG will be
23 provided and the boundaries under which MCI can utilize the information
24 contained in the RSAG database. It ensures that any download of the RSAG
25 database will be used only in providing local service and will not be shared with

1 the ALEC's subsidiaries or affiliates outside of the local service arena. The
2 license agreement also makes clear that BellSouth does not warrant the
3 information contained in the database. A copy of the License Agreement is
4 attached as Exhibit RMP-1.

5

6 Q. HAS THE COMMISSION ALREADY DETERMINED THAT A LICENSE
7 AGREEMENT IS NOT NECESSARY FOR MCI TO OBTAIN A
8 DOWNLOAD OF RSAG?

9

10 A. Yes, but only as it relates to the now expired interconnection agreement between
11 BellSouth and MCI. The issue here, which the Commission has not addressed, is
12 whether a license agreement should be required on a going forward basis under
13 the parties new Interconnection Agreement.

14

15 Q. IS THERE A COST ASSOCIATED WITH PROVIDING MCI WITH A
16 DOWNLOAD OF RSAG AND WHO SHOULD BEAR THIS COST?

17

18 A. Yes, BellSouth will incur a cost in producing a download of the RSAG. MCI
19 should bear the cost of this effort. The ultimate cost for RSAG downloads
20 depends on several factors, including but not limited to the fields that MCI
21 wants to receive and the size of the files to be delivered. Testing and actual
22 downloading, with the cooperation of MCI, will allow a more exact cost
23 determination for the downloading. An estimate of \$87,500 for the initial
24 download and \$500 to \$1000 for each subsequent download is BellSouth's best
25 estimate, without more specific information from MCI.

1

2

3 Q. HAS NOT THE COMMISSION DECIDED THAT MCI SHOULD NOT HAVE
4 TO PAY FOR A DOWNLOAD OF THE RSAG DATABASE AND
5 SUBSEQUENT UPDATES?

6

7 A. Yes, but only as it relates to the now expired interconnection agreement between
8 BellSouth and MCI. The issue here, which the Commission has not addressed, is
9 whether MCI should be required to pay for the RSAG download and subsequent
10 updates on a going forward basis under the parties new Interconnection
11 Agreement.

12

13

14 *Issue 89: When BellSouth rejects an MCIW order, should it be required to identify*
15 *all errors in the order that would cause it to be rejected?*

16

17 Q. WHAT IS YOUR UNDERSTANDING OF MCI'S REQUEST TO HAVE
18 BELLSOUTH IDENTIFY ALL ERRORS IN THE ORDER THAT WOULD
19 CAUSE IT TO BE REJECTED?

20

21 A. My understanding is that MCI wants all errors on MCI's Local Service
22 Request to be identified by BellSouth prior to returning that service request to
23 MCI for correction and resubmission. MCI believes this would prevent the
24 potential for submitting the service request multiple times.

25

1 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

2

3 A. Although BellSouth exercises its "best efforts" to identify all errors before
4 rejecting the LSR to the ALEC, this is not always possible. The type and
5 severity of the error may prevent the LSR from being processed further once an
6 error is discovered by BellSouth's system.

7

8 Q. PLEASE GIVE AN EXAMPLE OF AN ERROR THAT WOULD PREVENT
9 FURTHER PROCESSING.

10

11 A. An example of this type of error is an invalid address. If the address is
12 incorrect the LSR cannot be processed further and will be returned to the
13 ALEC. This is so because the address for a service request is a major
14 determinate as to the services available from the serving switch. As a result, an
15 LSR with an incorrect address will be returned to the ALEC before additional
16 edit checks are applied against the LSR for the specific services being
17 requested.

18

19 Q. CAN BELLSOUTH CHANGE ITS SYSTEMS, AS REQUESTED BY MCI?

20

21 A. Potentially there may be some enhancements but they can be accomplished
22 only at considerable time and expense. Much work would be necessary to even
23 evaluate what would be involved in modifying BellSouth's systems as
24 proposed by MCI. Furthermore, MCI can avoid the problem entirely by
25 submitting complete and accurate LSRs to BellSouth.

1

2

3 *Issue 90: Should BellSouth be required to provide completion notices for*
4 *manual orders?*

5

6 Q. WHAT IS YOUR UNDERSTANDING OF MCI'S REQUEST
7 CONCERNING COMPLETION NOTICES?

8

9 A. It is my understanding that MCI wants a completion notice on all orders,
10 including manual orders.

11

12 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

13

14 A. BellSouth provides completion notices on electronic orders. While BellSouth
15 cannot provide the same kind of electronic completion notification to MCI
16 when the order is submitted manually, BellSouth does provide a means by
17 which MCI can obtain this information.

18

19 Q. DOES BELLSOUTH PROVIDE COMPLETION NOTICES ON
20 ELECTRONICALLY DELIVERED LOCAL SERVICE REQUESTS?

21

22 A. Yes. Completion notices are delivered electronically to the ALEC for LSRs
23 submitted via BellSouth's electronic ordering interfaces. The completion
24 notices will be delivered to the ALEC once BellSouth's systems determine that

25

1 the service order is completed, is error free and is in the service order
2 completion or post completion status

3

4 Q. DOES BELLSOUTH SEND COMPLETION NOTICES FOR MANUAL
5 LOCAL SERVICE REQUESTS FROM ALECs?

6

7 A. No. BellSouth does not provide Completion Notices on manual local service
8 orders submitted by ALECs.

9

10 Q. DOES BELLSOUTH PROVIDE COMPLETION NOTICES TO ITS RETAIL
11 CUSTOMERS?

12

13 A. No. Neither service requests submitted manually or electronically to
14 BellSouth's retail units receive completion notices.

15

16 Q. DOES BELLSOUTH PROVIDE ALEC'S A METHOD FOR DETERMINING
17 THE STATUS OF ITS SERVICE ORDERS, INCLUDING MANUAL
18 ORDERS?

19

20 A. Yes. BellSouth provides MCI with the operational tools needed in order that
21 MCI can determine the current status of its orders on a daily basis, including if
22 manual orders are completed. This tool is the ALEC Service Order Tracking
23 System ("CSOTS") system. CSOTS is a web-based electronic interface allows
24 which became available in December 1999 that ALECs can access to view
25 service orders on-line, track service orders, and determine the status of their

1 service orders. Specifically, ALECs can view their orders as they appear in
2 BellSouth's Service Order Communication System ("SOCS"), and in addition
3 to obtaining completion status can obtain other useful provisioning and status
4 information, such as jeopardy statuses, pending facilities ("PFs"), and missed
5 appointments ("MAs"). CSOTS provides ALECs with a "view" that shows
6 service orders by order status and by state. CSOTS also allows ALECs to
7 search for information using a variety of criteria, including a range of due
8 dates; the current due date; the telephone account number; the service order
9 number; and the purchase order number ("PON"). ALECs can sort this
10 information by PON, by NPA NXX, by status type, by the number of days
11 orders have been in a particular status, by listed name, by service order
12 number, by current due date, and by application date. CSOTS offers ALECs
13 the option of viewing and/or downloading provisioning information to a
14 Microsoft's Excel™ spreadsheet program.

15

16 CSOTS is available on BellSouth's Interconnection Web Site at:

17 http://www.interconnection.bellsouth.com/markets/lec/ALEC_report.html.

18 The Local Exchange Carrier: ALEC Reports internet screen copy is attached as
19 Exhibit RMP-2.

20

21 CSOTS is a secured site and requires a password for access which MCI can
22 obtain by contacting its Account Team. The CSOTS User Guide is also
23 available on BellSouth's Interconnection Web Site at:

24 http://www.interconnection.com/guides/guides_p/html. The CSOTS User

25 Guide is attached as Exhibit RMP-3.

1

2 In summary, CSOTS provides ALECs access to the same service order
3 information that BellSouth provides to itself.

4

5 ***Issue 91: What intervals should apply to FOCs? Should BellSouth be required to***
6 ***check facilities before returning an FOC?***

7

8 Q. WHAT DO YOU UNDERSTAND MCI TO BE REQUESTING RELATING
9 TO THE FIRM ORDER CONFIRMATION (FOC)?

10

11 A. MCI wants BellSouth to provide MCI a FOC within the following intervals
12 and that all such FOCs shall be “firm commitments” based on BellSouth’s
13 check of available facilities.

14

15 1. For DS1 service requests (trunk augments or new trunk
16 groups), within two business days after receipt of the ASR.

17

18 2. For DS3 service requests (trunk augments of new trunk
19 groups), within three business days after receipt of the ASR.

20

21 3. For DS0/DS1 Loops (new Loops or augments to existing service),
22 within two business days after receipt of the LSR, and;

23

24 4. For DS3 Loops (new loops or augments to existing service),
25 three business days after receipt of the LSR.

1

2 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

3

4 A. First, allow me to clarify that an FOC is a firm order confirmation, not a firm
5 order commitment. Secondly, the FOCs intervals that should apply are
6 published in the BellSouth Products & Services Interval Guide to ensure parity
7 of service to all ALECs. BellSouth will make every effort to accommodate
8 service requests utilizing these intervals. As with all service provisioning
9 requests, these intervals assume an error free request, normal working
10 conditions including safety, load, weather, and availability of equipment and
11 facilities. The FOC process does not provide a confirmation of facilities
12 associated with the establishment of due dates except where the requested
13 service requires a SI as noted in the interval guide. Due dates will be provided
14 to the ALEC via the FOC process for each individual order. Although
15 BellSouth retail units do not receive an equivalent FOC, the process for
16 establishing the due date is accomplished in substantially the same time and
17 manner. There is no confirmation of facilities in establishing the due date for
18 the BellSouth retail units except for those services requiring a SI.

19

20 Q. WHAT IS AN FOC?

21

22 A. The Firm Order Confirmation acknowledges receipt of a complete and accurate
23 firm order LSR or ASR, which has been accepted by the BellSouth
24 downstream systems for provisioning. The FOC provides the ALEC a

25

1 confirmation of that acceptance and signifies BellSouth's good faith effort to
2 provide the service(s) as ordered by the due date on the FOC.

3

4 Q. HOW IS THE FOC INTERVAL DEFINED?

5

6 A. A FOC interval is defined as the number of days from receipt of the complete
7 and accurate request from the ALEC to day of transmittal by BellSouth of the
8 FOC to the ALEC.

9

10 Q. WHAT INTERVALS SHOULD APPLY TO FOCs FOR THE SERVICES
11 REQUESTED BY MCI?

12

13 A. The BellSouth Products and Services Interval Guide provides reasonable and
14 appropriate targeted service and FOC intervals to be used by all ALECs. The
15 interval guide is available on the BellSouth Interconnection Web site at:

16 http://interconnection.bellsouth.com/guides/guides_p.html

17 A copy of the BellSouth Products and Service Interval Guide is attached as
18 RMP-4.

19

20 Q. WHAT IS BELL SOUTH'S CONCERNS WITH MCI'S PROPOSED
21 INTERVALS?

22

23 A. In my opinion, MCI's request fails to address at least two considerations that
24 are necessary in the adoption of establishing service intervals: (1) the quantity
25 of loops or trunks that are requested on a service request is a critical factor in

1 determining the overall interval and the FOC interval (e.g. 1 to 5, 6-14, etc.)
2 and (2) consideration must be given as to the need for a SI in processing DS1
3 or DS3 service requests or any request for a large quantity.

4
5 Q. IF BELLSOUTH CHECKED FACILITIES BEFORE RETURNING A FOC
6 TO MCI, WHAT WOULD BE THE IMPACT ON THE FOC INTERVAL?

7
8 A. The FOC interval would be increased if this change were adopted. For
9 example, it would require the Loop Facility Assignment System ("LFACS") to
10 check facility records prior to the order process. Changing the process to
11 check facilities availability prior to returning the FOC to the ALEC would have
12 the effect of slowing BellSouth's delivery of the FOC. Further, except for
13 certain access services and project managed service activations, BellSouth does
14 not check facilities availability prior to committing to a due date for delivery of
15 service to BellSouth's retail customers.

16
17 Q. DOES BELLSOUTH CHECK FACILITIES FOR SERVICES REQUESTED
18 BY ITS RETAIL UNITS?

19
20 A. No. As stated previously, BellSouth does not verify facilities as part of the
21 ordering process for requested services by its end user customers unless that
22 service requires a SI. This is the same process accomplished in substantially
23 the same time and manner as that for the ALECs. In addition, an equivalent
24 FOC confirmation process does not exist for the BellSouth retail units

25

1 **96A: *Should BellSouth be required to provide customer service record (CSR)***
2 ***information in a format that permits its use in completing an order for***
3 ***service?***

4

5 Q. WHAT DO YOU UNDERSTAND THAT MCI WANTS IN ISSUE 96A?

6

7 A. I understand that MCI wants the BellSouth CSR to be parsed according to
8 industry standards or as specified by the Change Control Process (“CCP”) if
9 industry standards do not exist.

10

11 Q. DOES BELLSOUTH PROVIDE MCI, AND OTHER ALECS
12 NONDISCRIMINATORY ACCESS TO CSR INFORMATION?

13

14 A. Yes. As stated earlier in my testimony, BellSouth provides access to its
15 customer service records in Florida, including access to credit history
16 information. ALEC service representatives using TAG access Business Office
17 Customer Records Information System (“BOCRIS”). BOCRIS is a front-end
18 presentation manager which presents customer service information from the
19 Customer Information Records System (“CRIS”). ALECS with on-line access,
20 view and print CSR information in substantially the same time and manner as
21 BellSouth service representatives can view and print this information for
22 BellSouth’s own retail customers

23

24 Q. WHAT DOES PARSE MEAN?

25

1 A. To parse means to receive a stream of data from the CSR and break down that
2 data into certain fields for further use.

3

4 Q. DOES BELLSOUTH CURRENTLY PROVIDE ALECS THE CSR IN A
5 MANNER THAT CAN BE PARSED?

6

7 A. Yes. BellSouth currently provides the ALECs a stream of data via the
8 machine-to-machine TAG pre-ordering interface based on the Common Object
9 Request Broker Architecture ("CORBA") industry standard. The stream of
10 data is identified by section with each line uniquely identified and delimited.
11 This data is provided to ALECs in the same manner as it is to BellSouth's
12 Retail units.

13

14 Q. EXPLAIN HOW ALECS CAN PARSE THE CSR VIA TAG.

15

16 A. The TAG pre-ordering interface can be integrated with the TAG ordering
17 interface or the Electronic Data Interexchange ("EDI") ordering interface. The
18 CSR data that is delivered to the ALEC via TAG can be further parsed by the
19 ALEC to exactly the level needed on an order, just as BellSouth parses CSRs
20 in its own retail operations.

21

22 Q IF THE ALEC INTEGRATES THE TAG PRE-ORDERING INTERFACE
23 WITH ITS TAG OR EDI ORDERING INTERFACE AND WITH ITS OSS,
24 WILL THE CSR INFORMATION OBTAINED VIA TAG "FLOW INTO"
25 ITS OWN OSS?

1

2 A. Yes, that is the purpose of integratable, machine-to-machine interfaces.
3 ALECs, such as MCI, can integrate the TAG pre-ordering interface with the
4 TAG ordering interface or the EDI ordering interface. ALECs can integrate
5 these interfaces with their own internal OSS. Integration allows the ALECs
6 the ability to manipulate the data obtained via the TAG pre-ordering interface.
7 This includes the ability to further parse the CSR. The data can be
8 manipulated so that it will "flow into" a ALEC's OSS.

9

10 Q. HAS A CHANGE REQUEST FOR PARSED CSRS BEEN SUBMITTED TO
11 THE CHANGE CONTROL PROCESS ("CCP")?

12

13 A. Yes. A request for Parsed CSRs was submitted via a Change Request, Log #
14 TAG0812990003, on August 12, 1999, requesting that BellSouth deliver a
15 parsed CSR as part of the pre-ordering functionality.

16

17 Q. WHAT IS THE STATUS OF THIS CHANGE REQUEST?

18

19 A. The Change Request was presented during the September 28, 1999 CCP
20 Enhancement Review Meeting and prioritized as one of eleven pending change
21 requests to be considered for implementation in 2000. During the November
22 30, 1999 CCP Release Planning Meeting, this Change Request was updated for
23 planning and analysis to begin in mid-2000. This pending change request was
24 reviewed during the March 29, 2000 CCP Monthly Status Call and it was
25 decided a sub-team would be formed during 2000 to investigate the

1 implementation of sub-parsed CSR. This change request was prioritized is the
2 number one pre-ordering request during the June 28, 2000 Change Review
3 Meeting. The sub-team is being formed in August 2000 and will include
4 representatives from BellSouth and the ALEC CCP participants.

5
6 I would note that while the time frames mentioned above may seem lengthy, it
7 is the ALECs that prioritize the changes that are addressed and implemented
8 and the time frames that have resulted are the consequence of the ALECs
9 themselves placing more important or critical changes ahead of the change
10 request for parsing, particularly with regard to OSS99 release where other
11 changes were made. In the meantime, any changes to BellSouth's OSS that
12 MCI may desire should be handled through the CCP process where the entire
13 industry can participate, rather than through an individual arbitration
14 proceeding.

15

16

17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18

19 A. Yes.

20

21

22

23

24

25

1 Bellsouth Telecommunications, Inc.
2 Rebuttal Testimony of Ronald M. Pate
3 Before the Florida Public Service Commission
4 Docket No. 000649-TP
5 September 7, 2000
6
7

8 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH Bellsouth
9 Telecommunications, Inc. AND YOUR BUSINESS ADDRESS.

10

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

17

18 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

19

20 A. Yes. I filed direct testimony on August 17, 2000.

21

22 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

23

24 A. The purpose of my testimony is to rebut the direct testimony of Mr. Don
25 Price and Ms. Sherry Lichtenberg of MCI Metro Access Transmission

1 Services, LLC and MCI WorldCom Communications, Inc. ("MCI").
2 Specifically, my comments respond to their direct testimony regarding
3 Issues Nos. 1, 80, 81, 90 ,91 and 96A.
4
5

6 ***Issue 1: Should the electronically ordered NRC apply in the event an***
7 ***order is submitted manually when electronic interfaces are not***
8 ***available or not functioning within specified standards or***
9 ***parameters?***
10

11 Q. PAGE 4 OF MR. PRICE' S TESTIMONY SUGGESTS THAT
12 BELL SOUTH IS DISCRIMINATING AGAINST ALECS BY PROVIDING
13 ELECTRONIC ORDERING PROCESSES FOR ITS OWN RETAIL
14 OPERATIONS WHILE REQUIRING ALECS TO ORDER THE SAME
15 PRODUCTS AND SERVICES MANUALLY. DO YOU AGREE?
16

17 A. No. As stated in my direct testimony, neither MCI' s petition nor Mr.
18 Price ' s direct testimony offers any specific information to support his
19 suggestion that BellSouth is acting in a discriminatory manner, and I
20 disagree strongly with this claim. I am not aware of any situation of the
21 type described by Mr. Price where " BellSouth does not provide
22 electronic ordering for ALECS for the service in question, but does
23 provide electronic ordering for itself." Thus, the issue referenced by
24 Mr. Price is not an issue at all.
25

1 Q. MR. PRICE, ON PAGE 4-5 OF HIS DIRECT TESTIMONY, STATES
2 "BELLSOUTH SHOULD NOT BE ENCOURAGED TO USE
3 INEFFICIENT, COSTLY SYSTEMS TO SERVE ALECS ...". PLEASE
4 COMMENT.

5
6 A. Again, I disagree strongly with the implication of Mr. Price's statement
7 that BellSouth uses "inefficient costly systems to serve ALECs" which
8 is not the case. BellSouth has provided the ALECs efficient, cost
9 effective and non-discriminatory access to its operations support
10 systems ("OSS") for pre-ordering, ordering, provisioning, maintenance
11 and repair, and billing through robust and reliable manual and electronic
12 interfaces. The electronic interfaces are: Local Exchange Navigation
13 System ("LENS"), Telecommunications Access Gateway ("TAG"),
14 RoboTAG, Electronic Data Interchange ("EDI"), Trouble Analysis
15 Facilitation Interface ("TAFI"), Electronic Communications Trouble
16 Administration ("ECTA"), Optional Daily Usage File ("ODUF"),
17 Enhanced Optional Daily Usage File ("EODUF"), and Access Daily
18 Usage File ("ADUF").

19
20 The interfaces for ALECs provide a full range of options from which to
21 choose including integratable machine-to-machine interfaces,
22 human-to-machine interfaces and manual interfaces. For whatever
23 reason, MCI has chosen to use the manual interfaces for UNE and
24 resale services, even when MCI could submit these orders
25 electronically. In spite of the availability of electronic interface capability,

1 MCI does not utilize these efficient and cost effective means to submit
2 their local service requests.

3

4

5 ***Issue 78: How should credit information be provided to MCIW?***

6

7 Q. WHAT IS BELLSOUTH' S POSITION ON THIS ISSUE?

8

9 A. It is BellSouth' s understanding that this issue has been resolved by the
10 parties; however, BellSouth reserves the right to file testimony on this
11 issue, should it be further disputed.

12

13

14 ***Issue 80: Should BellSouth be required to provide an application to***
15 ***application access service order inquiry process?***

16

17 Q. ON PAGE 4 OF HER DIRECT TESTIMONY, MS. LICHTENBERG
18 IMPLIES THAT MCI HAS USED ACCESS SERVICE REQUESTS
19 ("ASRs") TO ORDER UNBUNDLED NETWORK ELEMENTS, SUCH
20 AS ENHANCED EXTENDED LOOPS ("EELs"). IS MS.
21 LICHTENBERG CORRECT?

22

23 A. No. Notwithstanding any claim by Ms. Lichtenberg to the contrary, MCI
24 is not submitting an ASR to order EELs or any other unbundled network
25

1 elements. Rather, MCI is ordering Special Access service from an end
2 user' s location to the MCI switch. BellSouth is provisioning and
3 installing Special Access and then manually crediting MCI monthly with
4 the difference between Special Access and UNE rates. BellSouth
5 defined a process whereby MCI can convert these from Special Access
6 to the UNE combination. To date, MCI has refused to make these
7 conversions.

8

9 Q. MS. LICHTENBERG STATES "SUCH AN APPLICATION-TO-
10 APPLICATION INQUIRY IS NEEDED TO OBTAIN PRE-ORDER
11 INFORMATION ELECTRONICALLY FOR UNES ORDERED VIA AN
12 ACCESS SERVICE REQUEST AND SHOULD BE PROVIDED."
13 PLEASE COMMENT.

14

15 A. Ms. Lichtenberg' s claim that MCI needs an ASR interface in order " to
16 obtain pre-order information electronically for UNEs..." is wrong and
17 misleading. The Local Service Request ("LSR") is the industry-defined
18 means of ordering UNEs, not the ASR process. Each UNE offered by
19 BellSouth can be ordered via an LSR, and MCI need not utilize an ASR
20 to order any UNE, as Ms. Lichtenberg suggests. That MCI has
21 consistently resisted ordering EELs via an LSR does not require that
22 BellSouth enhance its ASR interface to facilitate MCI' s purchase of
23 access services.

24

25

1 Q. WHAT DID THE COMMISSION IN DOCKET NO. 980281 SAY ABOUT
2 THE USE OF THE ASR PROCESS FOR ORDERING UNEs?

3

4 A. In its Order, the Commission ruled the ASR process was to be used as
5 an "interim interface, through the LCSC." This interim interface was
6 to be temporary until "BellSouth met its obligations to provide real time
7 interactive access to its OSS for pre-ordering and ordering via (an)
8 electronic interface as detailed in the agreement." The Commission
9 did not imply that all orders for UNEs had to have the capability of being
10 ordered electronically, but rather that BellSouth must implement real
11 time interactive interfaces at parity with what BellSouth utilizes for itself.
12 Since BellSouth does not have an electronic ordering interface for its
13 high capacity services, such as MegaLink service, an electronic
14 ordering interface for similar UNEs is not necessary to comply with the
15 Florida Public Service Commission's order. Therefore, there is no
16 requirement that MCI order EELs or any other UNE through the ASR
17 process.

18

19 Q. HAS THE FCC EXPRESSED ITS VIEW ON THE USE OF THE ASR
20 FOR ORDERING EELs?

21

22 A. Yes. In the FCC's Third Report and Order and the Supplemental
23 Order Clarification that followed, the FCC advised that the ASR process
24 was one method of ordering of EELs, and the conversion of Special
25 Access service to UNEs. In paragraph 298 of the Third Report and

1 Order, the FCC states: "If the EEL is available and a requesting carrier
2 seeks to serve a high volume business, the incumbent LEC can
3 provision the high capacity loop and connect directly to a requesting
4 carrier's collocation cage." MCI is not requesting that high capacity
5 loops be connected directly to its collocation space. MCI is ordering
6 Special Access service from an end user's location to the MCI switch.
7 Footnote 581 in FCC 98-238 states: "Furthermore, requesting carriers
8 and incumbent LECs have developed routine provisioning processes to
9 deploy the EEL using the ASR process, and thus requesting carriers
10 will not face delays and costs to integrate the EEL into their networks."
11 This footnote does not require BellSouth to provision these types of
12 loops using an ASR process. It simply observes that the ASR process
13 is one method for the provision of EELs.

14

15 Q. DOES AN APPLICATION-TO-APPLICATION PRE-ORDERING
16 INTERFACE EXISTS FOR LSRs?

17

18 A. Yes. BellSouth provides ALECs with access to the same pre-ordering,
19 ordering and provisioning OSS accessed by BellSouth's retail
20 organizations through the machine-to-machine Telecommunications
21 Access Gateway ("TAG") electronic interface. BellSouth supplies
22 ALECs with all the specifications necessary for integrating the pre-
23 ordering functionality of TAG with the ordering functionality of other
24 electronic interfaces. An ALEC may integrate the TAG pre-ordering
25 interface with the Electronic Data Interchange ("EDI") ordering

1 interface or with the TAG pre-ordering with TAG ordering. ALECs
2 interested in integrating the pre-ordering and ordering functionality of
3 the interfaces have responsibility for performing that integration.

4
5 Q. CAN THE TAG PRE-ORDERING INTERFACE BE INTEGRATED
6 WITH AN ASR?

7
8 A. Yes. MCI would have to do the integration on their side of the interface.
9 Thus, what MCI is requesting in an application-to-application interface
10 for access service requests for local services already exist. However,
11 once again, the ASR is not the mechanism for ordering local services.

12
13
14 **Issue 81: *Should BellSouth provide a service inquiry process for local***
15 ***services as a preordering function?***

16
17 Q AS YOU UNDERSTAND MCI' S REQUIREMENTS, WILL
18 BELLSOUTH' S DETAILED LOOP MAKE-UP INFORMATION AS A
19 PRE-ORDERING FUNCTION VIA THE SERVICE INQUIRY ("SI"), IN
20 ITSELF, SATISFY MCI?

21
22 A. No. My testimony of August 17, 2000 described BellSouth' s plans and
23 procedures to satisfy the 319 Remand Obligations regarding Loop
24 Qualification. With that background, I do not think that this SI process
25 will satisfy all of MCI' s requirements as stated. MCI is asking for

1 manual and electronic SI processes for the pre-ordering of local
2 services that would indicate whether facilities are available to serve an
3 end user, information regarding redundancy, and possibly other
4 information to be specified by MCI.

5

6 Q. IS MCI'S REQUEST A FUNCTION OF PRE-ORDERING AS DEFINED
7 BY THE FCC?

8

9 A. No. Pre-ordering deals with the collection of information necessary to
10 populate an order for resale services or UNEs. MCI's request deals
11 with the gathering of data to have assurance of facilities availability for
12 the purpose of developing sales proposals. That was not contemplated
13 by the Act and as such BellSouth has no statutory requirement to
14 provide such.

15

16 Q. IS BELLSOUTH NECESSARILY OPPOSED TO PROVIDING MCI
17 WITH A SERVICE INQUIRY PROCESS THAT WOULD ENABLE MCI
18 TO GATHER INFORMATION TO DEVELOP SALES PROPOSALS?

19

20 A. No. Even though BellSouth is not required to develop the process
21 proposed by MCI, BellSouth has no objection to this issue being
22 considered by the industry through the Change Control Process
23 ("CCP"). The CCP is the process by which BellSouth and participating
24 ALECs manage requested changes to the BellSouth Local Interfaces,
25 the introduction of new interfaces, and the identification and resolution

1 of issues related to Change Requests. This process covers Change
2 Requests initiated by both BellSouth and ALECs that affect external
3 users of BellSouth's electronic interface applications and/or,
4 associated manual processes

5
6 BellSouth and representatives of the ALECs will meet to review,
7 prioritize, and make recommendations for candidate Change Requests.
8 Through this process the input from all interested ALECs is considered
9 and the decisions that result will best serve the ALEC community as a
10 whole.

11 The CCP process is described in the BellSouth Website:

12 http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html

13

14 The ALEC industry should have the opportunity to decide whether
15 MCI's proposed service inquiry process would be beneficial to
16 promoting local competition and the extent to which this process should
17 be given priority over other changes to BellSouth's interfaces currently
18 under discussion.

19

20

21 ***Issue 83: Should BellSouth be required to provide downloads of the***
22 ***RSAG database without license agreements?***

23

24 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

25

1 A. It is BellSouth's understanding that this issue has been resolved by the
2 parties; however, BellSouth reserves the right to file testimony on the
3 issue, should it be further disputed.

4

5

6 **Issue 89: When BellSouth rejects an MCIW order, should it be required to**
7 **identify all errors in the order that would cause it to be rejected**

8

9 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

10

11 A. It is BellSouth's understanding that this issue has been resolved by the
12 parties; however, BellSouth reserves the right to file testimony on the
13 issue, should it be further disputed.

14

15

16 **Issue 90: Should BellSouth be required to provide completion notices for**
17 **manual orders?**

18

19 Q. ON PAGE 14 OF HER DIRECT TESTIMONY, MS. LICHTENBERG
20 STATES " PROVIDING COMPLETION NOTIFICATION VIA CSOTS...
21 WOULD BE COSTLY AND INEFFICIENT FOR WORLDCOM" .
22 PLEASE COMMENT.

23

24 A. I find it somewhat confusing that Ms. Lichtenberg accepts fax and e-
25 mail completions on manual orders in New York and Texas, which -

1 requires manual handling and processing within MCI, yet she does not
2 want MCI to expend any effort to obtain the same type information from
3 the BellSouth CLEC Service Order Tracking System ("CSOTS"). The
4 effort to receive and process a manual completion notice by MCI for
5 New York and Texas would seem to be more costly and inefficient to
6 MCI than accessing the CSOTS web-based electronic interface.

7

8 CSOTS, which has been successfully serving ALECs since December
9 1999, allows ALECs to view service orders on-line, track orders, and
10 determine the status of their service orders. It permits MCI to obtain the
11 completions information promptly, avoids transcription and other clerical
12 type errors characteristic of manually transmitting information via
13 facsimile or e-mail, and involves fewer people in the process.

14

15 Q. HOW OFTEN WOULD MCI NEED TO ACCESS CSOTS TO OBTAIN
16 UPDATED COMPLETION STATUS ON ITS ORDERS?

17

18 A. Accessing CSOTS once a day would provide MCI with the needed
19 information concerning completion of orders. As CSOTS accesses the
20 Service Order Communications System ("SOCS") for its information,
21 SOCS is updated nightly with those orders that have been completed.

22

23

24

25

As detailed on pages 11 through 13 of the CLEC Service Order
Tracking System Users Guide, which was provided as Exhibit RMP-3 in

1 my direct testimony, an ALEC can easily retrieve a Service Order
2 Status report.

3 This report provides a matrix by order status of the number of service
4 orders existing within each status category. The order statuses as
5 noted on page 12 of the Users Guide are as follows:

6 PD – Pending Dispatch

7 PF – Pending Facilities

8 AO – Assignable Order

9 MA – Missed Appointment

10 CA – Cancelled

11 CP – Completed

12

13 Simply by clicking on anyone of the above order status categories, all
14 service orders will be shown for that status category. Thus, MCI can
15 easily access all service orders in a completed (CP) status.

16

17 Q. WAS CSOTS DEVELOPED FOR THE PURPOSE OF PROVIDING
18 COMPLETION NOTICES?

19

20 A. No. While that is one of the attributes of CSOTS, its benefits to ALECs
21 are far more encompassing. CSOTS was initially designed based on
22 ALECs desire to see their orders as being provisioned by the BellSouth
23 downstream system. CSOTS allows the ALESc to view the service
24 order as it exists in BellSouth's SOCS. As such this allows ALECs to
25 get the current status on the order of which completions is one type of

1 status. Other statuses are detailed in the manner that allows the ALEC
2 to follow its orders from initial acceptance through completion. In
3 addition, CSOTS provides summary reports by order status, by state or
4 for the BellSouth region.

5

6 CSOTS was designed with input from the ALEC community and is
7 currently managed under the Change Control Process. In summary,
8 CSOTS is a comprehensive operational tool for tracking service orders
9 and was developed solely for the benefit of the ALEC community.

10

11 Q IS BELLSOUTH NECESSARILY OPPOSED TO PROVIDING
12 COMPLETION NOTICES ON MANUALLY SUBMITTED LSRs?

13

14 A. No. Even though BellSouth is not required to provide completion
15 notices on manually submitted LSRs, BellSouth has no objection to this
16 issue being considered by the ALEC industry through the CCP. The
17 CCP is the appropriate industry forum to review, assess, and prioritize
18 changes to the BellSouth interfaces, particularly since CSOTS is one of
19 the interfaces managed by the CCP.

20

21

22

***Issue 91: What intervals should apply to FOCs? Should BellSouth be
23 required to check facilities before returning an FOC?***

24

25

1 Q. WHAT ARE YOUR CONCERNS WITH MS. LICHTENBERG' S
2 PROPOSED INTERVALS FOR FIRM ORDER CONFIRMATIONS
3 ("FOCs")?
4

5 A. Without consideration for MCI' s desire for facilities confirmation, Ms.
6 Lichtenberg' s proposal fails to consider the quantity of services that
7 may be requested. A FOC interval of two business days for a single
8 DS0 service request is far different than a two-business day FOC
9 interval for fifteen DS0 services ordered at one time for the same
10 location(s). Ms. Lichtenberg would assign two business days to any
11 quantity of network elements ordered by MCI. The same concerns
12 exist for the proposal for a three business day FOC interval for DS3
13 services. This interval also fails to consider the quantity issue. In
14 addition, it does not consider time for an inquiry of available facilities
15 currently performed through the Service Inquiry ("SI") process which is
16 required for DS3 services.
17

18 Q. IS MCI BEING CONSISTENT WITH ITS PROPOSED FOC
19 INTERVALS?
20

21 A. No. While requesting shorter FOC intervals, Ms. Lichtenberg wants
22 BellSouth to check facilities before returning the FOC to MCI. As
23 described in my testimony of August 17, 2000 page 31, the FOC
24 interval would be increased if BellSouth checked facilities before
25 returning a FOC to MCI, which is just the opposite of what MCI

1 apparently desires. Furthermore, BellSouth does not check facilities
2 for its retail customers, and there is no requirement that BellSouth do so
3 for MCI.

4
5 Q. IF MCI WERE TO AGREE TO AN EXTENDED FOC INTERVAL IN
6 ORDER TO HAVE FACILITY CONFIRMATION, WOULD BELLSOUTH
7 AGREE TO SUCH AN ARRANGEMENT?

8
9 A. No. Under the Telecommunications Act, BellSouth is obligated to provide
10 processes for pre-ordering, ordering, maintenance and repair, and billing at
11 parity for all ALECs. Thus the preferential treatment being requested
12 by MCI could not be developed without making such available to all
13 ALECs. As discussed in my direct testimony, since BellSouth does not
14 confirm facilities as part of pre-ordering for its retail units, except where
15 an SI is required, there is no requirement that BellSouth provide this
16 functionality for MCI or any other ALEC.

17
18 In addition, the operational processes of the Local Carrier Service
19 Center ("LCSC") are designed for a mass production environment.
20 Today, BellSouth receives monthly, on average, in excess of 250,000
21 LSR submissions of which 80% are submitted electronically.
22 Confirmation of facilities would inject an additional process step that
23 would significantly impact BellSouth's efficiency and costs of order
24 processing.

25

1

2 **Issue 96A: Should BellSouth be required to provide customer service**
3 **record (CSR) information in a format that permits its use in**
4 **completing an order for service?**

5

6 Q. ON PAGE 17 OF HER TESTIMONY, MS. LICHTENBERG STATES
7 "BELLSOUTH TODAY USES CSR INFORMATION TO POPULATE
8 AUTOMATICALLY ORDERS IN ITS OWN ORDERING SYSTEM".
9 PLEASE COMMENT.

10

11 A. Ms. Lichtenberg's statement is correct. However, she does not
12 properly portray this as it relates to the issue presented by MCI. As
13 discussed in my direct testimony, BellSouth provides ALECs with the
14 same stream of data for the CSR that BellSouth provides to its retail
15 units. BellSouth uses parts of that information to pre-populate an order
16 that is acceptable by the Service Order Communications System
17 ("SOCS") for further provisioning downstream. MCI's issue deals with
18 a further sub-line level of parsing that goes beyond what is needed to
19 process an order in SOCS.

20

21 Q. ON PAGE 17 OF HER DIRECT TESTIMONY, MS. LICHTENBERG
22 SUGGESTS THAT BELLSOUTH SHOULD UTILIZE THE CHANGE
23 CONTROL PROCESS TO DEVELOP PARSING FOR CSRS. PLEASE
24 COMMENT.

25

1 A. That is exactly what BellSouth is doing. As explained in my direct
2 testimony, a Change Request currently is open in CCP for the parsing
3 of CSRs. A team is to be formed to assess the feasibility of
4 implementing the parsing capability being requested by MCI. Other
5 ALECs have expressed a similar interest and the CCP is the proper
6 industry forum for the resolution of this issue. This will ensure input
7 from all interested ALECs participating in CCP in order that the best
8 solution for the community as a whole can be evaluated.

9
10 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

11 A. Yes.

12

13

14

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25

1 BY MR. GOGGIN:

2 Q Mr. Pate, did you prepare a summary of your
3 testimony?

4 A Yes, I did.

5 Q Please give your summary now, thank you.

6 A Certainly.

7 Good morning. The purpose of my testimony is to
8 provide BellSouth's position on several issues raised
9 before the Florida Public Service Commission in MCI's
10 petition for arbitration. While my testimony addresses
11 nine issues, my summary will only address issues Numbered
12 80, 81, 90, 91, and 96-A.

13 Issue 80 concerns providing an
14 application-to-application service access order process so
15 that preordering functionalities, such as address
16 validation, telephone number assignment, and service and
17 feature availability are provided for access service
18 requests, known as ASRs. MCI implies that it has used the
19 ASR to order unbundled network elements, specifically DS-1
20 combinations, which is a type of the enhance extended
21 loop, known as the EEL.

22 However, let me clarify what is actually being
23 ordered by MCI. The reality is MCI is using the ASR to
24 order special access service from an end user's location
25 to the MCI switch. BellSouth is provisioning and

1 installing special access, and then manually crediting MCI
2 monthly with the difference between special access and
3 unbundled network elements, UNE rates.

4 Additionally, BellSouth has defined a process
5 whereby MCI can convert these from special access to the
6 UNE combination. To date MCI has refused to make these
7 conversions.

8 With that said, MCI would have BellSouth build
9 such an application-to-application interface so that it
10 may submit orders for certain unbundled network elements
11 for local services via ASR. However --

12 COMMISSIONER JACOBS: Excuse me. What does that
13 conversion entail?

14 THE WITNESS: Beg your pardon?

15 COMMISSIONER JACOBS: What does the conversion
16 that you described entail?

17 THE WITNESS: It entails two approaches. Where
18 you have several of the items to convert, we have offered
19 a method for a spreadsheet that they would fill out that
20 really simplifies the process, and they submit that
21 spreadsheet information to us and we take care of it. It
22 is a spreadsheet that has, I believe, nine common elements
23 for each one they would convert, and then 11 things they
24 would have to provide to us specific to that individual
25 conversion. And based with that information, we will do,

1 essentially, the record conversion associated with
2 changing that from an access service to the combination
3 service.

4 COMMISSIONER JACOBS: Thank you.

5 THE WITNESS: However, the ASR is not the
6 ordering mechanism for unbundled network elements for
7 local services. All unbundled network elements and resale
8 services can be ordered via the local service request,
9 known as the LSR. This is the industry standard national
10 format prescribed by the Ordering and Billing Forum, known
11 as OBF. BellSouth currently provides LSR preordering
12 functionality through the Telecommunications Access
13 Gateway, TAG, application-to-application interface. For
14 local services the ASR is prescribed only for
15 interconnection trunks. Therefore, there is no
16 requirement for an application-to-application preordering
17 functionality to be added for access services.

18 Issue 81. Issue 81 evolves around MCI's desire
19 for a service inquiry process in order that MCI's
20 marketing personnel may gather information to assist them
21 in developing sales proposals. BellSouth provides
22 alternative local exchange carriers, ALECs, with access to
23 the necessary information for preordering and ordering up
24 services in substantially the same time and manner as
25 BellSouth provides its own retail units.

1 Preordering deals with the collection of
2 information necessary to populate an order for resale
3 services or unbundled network elements. However, MCI's
4 request deals with the gathering of data to have assurance
5 of facilities availability for the purpose of developing
6 sales proposals. That was not contemplated by the act and
7 as such, BellSouth has no obligation to provide it.

8 Therefore, BellSouth should not be required to develop any
9 additional service inquiry process, particularly where the
10 intent of such is for the use in a sales proposal process.

11 Issue 90 regards providing MCI with a completion
12 notification on LSRs that were submitted manually by MCI.
13 While BellSouth cannot provide the same kind of completion
14 notification to MCI as when the order is submitted
15 electronically, BellSouth does provide MCI with the
16 operational tools needed in order that they can determine
17 the current status of its order on a daily basis,
18 including if manual orders are completed.

19 The tool is the CLEC service order tracking
20 system, CSOTS, and it became available to ALECs in
21 December of 1999. The CSOT system is designed to provide
22 the ALEC community the capability to view service orders
23 on line, determine order status, including completion
24 status on manual orders and track their service orders.
25 CSOTS interfaces with BellSouth's service order.

1 communications systems, SOCS, and provides service order
2 information for manually and electronically submitted
3 local service requests.

4 Issue 91. Issue 91 deals with confirmation of
5 facilities as part of the firm order confirmation, FOC,
6 process. MCI desires BellSouth to maintain the current
7 FOC intervals and add to that process a facilities
8 confirmation prior to returning the FOC. The FOC
9 acknowledges receipt of a complete and accurate firm order
10 local service request, which has been accepted by the
11 BellSouth downstream systems for provisioning. The FOC
12 provides the ALEC a confirmation of that acceptance and
13 signifies BellSouth's good faith effort to provide the
14 services as ordered by the due date on the FOC.

15 There is not a confirmation of facilities
16 associated with the establishment of the due dates, except
17 where the requested service requires a service inquiry as
18 noted in the BellSouth's product and services interval
19 guide. BellSouth does not verify facilities as part of
20 the ordering process for requested services by its own
21 retail end user customers unless, also, that service
22 requires a service inquiry. This is the same process
23 accomplished in substantially the same time and manner as
24 that for the ALECs. In addition, an equivalent FOC
25 confirmation process does not exist for the BellSouth

1 retail units.

2 Issue 96-A. This issue pertains to the parsing
3 of customer service records, known as CSRs. MCI wants the
4 BellSouth CSR to be parsed according to industry standards
5 or as specified by the change control process if industry
6 standards do not exist.

7 First, as background information, to parse means
8 to receive a stream of data from the CSR and break down
9 that data into certain fields for future use. An example
10 would be the breaking down of the end user's name and
11 address obtained on the CSR during the preordering
12 process, and then integrating that information into the
13 local service request so that re-entry of the data would
14 not be required.

15 With that said, I must emphasize that the CSR is
16 not available from the Customer Record Information System,
17 CRIS, in a parsed form. It is issue with that database
18 where the information resides which once again is CRIS.
19 What CRIS does provide is a line of information uniquely
20 identified by section identifiers and delimited. Further,
21 subline parsing is what MCI desires when it refers to
22 parsing of the CSR, and that is not available today.

23 However, BellSouth's Telecommunications Access
24 Gateway, TAG, electronic interface provides the CSR as a
25 stream of data which an ALEC can parse to the same level.

1 as BellSouth does for itself, utilizing the unique CSR
2 section identifiers and delimiters. Thus, TAG will allow
3 ALECs to parse CSRs in the same way BellSouth can parse
4 CSRs. The CSR information is provided by TAG in the same
5 form as that provided to the BellSouth retail units
6 accessing the same identical CRIS database. Consequently,
7 BellSouth provides MCI and all other ALECs with
8 nondiscriminatory access to the CRIS database for
9 preordering and ordering as well as required information
10 contained in the CRIS database.

11 This brings up a final point I would like to
12 emphasize. AT&T has submitted a change request via the
13 change control process for BellSouth to deliver a parsed
14 CSR. In her testimony Ms. Lichtenberg suggests that
15 BellSouth utilize the change control process to develop
16 parsing for CSRs. Hence, this as being an issue for an
17 arbitration perplexes me, as this is exactly what
18 BellSouth is doing.

19 BellSouth concurs with Ms. Lichtenberg's
20 implication that the change control process is the proper
21 forum for this request to be managed. The change control
22 process will ensure input from all interested ALECs in
23 order that the best solution for the community as a whole
24 can be evaluated. As noted in BellSouth's change control
25 process review meeting minutes of September 27th, 2000, a

1 conference call was scheduled this week to begin jointly
2 addressing the request. Once BellSouth has a better
3 understanding of the ALEC requirements and complexity of
4 the effort, this feature will most likely be targeted for
5 an upcoming release.

6 Thank you. This concludes my summary.

7 COMMISSIONER JACOBS: Cross.

8 MR. O'ROARK: Thank you, Mr. Chairman.

9 CROSS EXAMINATION

10 BY MR. O'ROARK:

11 Q Good morning, Mr. Pate.

12 A Good morning.

13 Q Let's start with the one issue that you didn't
14 address in your summary, Issue 1, which I believe you had
15 some testimony on. You recall that issue concerns the
16 circumstances in which BellSouth may assess a manual as
17 opposed to an electronic ordering charge?

18 A Yes.

19 Q And you are aware that for sometime now WorldCom
20 has been ordering local DS-1 circuits from BellSouth, and
21 I believe you refer to it as DS-1 combinations or that we
22 sometimes call DS-1 combos for short?

23 A Yes.

24 Q And just so we are clear, a DS-1 combo is a
25 combination of the DS-1 loop from the customer premises to

1 the BellSouth serving wire center, and then DS-1 transport
2 from that wire center to the BellSouth serving wire center
3 that serves the WorldCom switch, is that right?

4 A I think that describes it accurately. And, once
5 again, that is a form of EEL, the enhanced extended loop.

6 Q And you are aware, aren't you, that beginning in
7 November 1997 WorldCom requested that BellSouth provision
8 those DS-1 combo circuits or those circuits, rather, as
9 DS-1 combos, aren't you?

10 A Yes.

11 Q And BellSouth at that time refused to do that?

12 A Well, I think the refusal deals with the
13 methodology of how you wanted to provision those.

14 Q BellSouth did not want to provision those
15 circuits as DS-1 -- as UNE circuits, did it?

16 A Well, I'm not sure of that. My knowledge deals
17 with the provision of those via the ASR process. If there
18 is something else, I'm not your person, then.

19 Q Well, let me put it this way. WorldCom brought
20 an enforcement case before this Commission on that issue
21 and this Commission ordered that BellSouth provision our
22 orders as DS-1 combos under our existing agreement, is
23 that right?

24 A I am vaguely familiar with that, yes.

25 MR. GOGGIN: Mr. Chairman, I would like to hand

1 out the Commission's order in that case. That is on the
2 Commission's official recognition list, so we are not
3 requesting that it be admitted as an exhibit here.

4 COMMISSIONER JACOBS: Very well.

5 BY MR. GOGGIN:

6 Q Mr. Pate, can we agree that functionally a DS-1
7 combo is the same thing as a MegaLink circuit?

8 A Yes, we can agree that the DS-1 combo can
9 deliver the same general transmission functionalities of
10 MegaLink. So from that standpoint there are those
11 similarities. There may be some other differences that I
12 am not aware of, but those similarities exist.

13 Q Let me ask you to take a look at the order I've
14 just distributed, which is the order in Docket Number
15 981121-TP, Order Number PSC-99-1089-FOF-TP, that was
16 issued on May 27th, 1999. Do you have that in front of
17 you?

18 A Yes.

19 Q Let me ask you to turn to the third page of that
20 exhibit, if you would?

21 A I'm there.

22 Q And then on the third paragraph it discusses the
23 testimony of BellSouth Witness Milner. The order says
24 that Mr. Milner explained that BellSouth offers MegaLink
25 through its private line services tariff, but functionally

1 MegaLink is the same as a DS-1 loop and dedicated
2 transport combination. Do you see that?

3 A Yes, I do.

4 Q And then moving to the first sentence in the
5 next paragraph, the Commission's order states that MCI's
6 Witnesses Martin and Gillian acknowledged that the DS-1
7 loop/DS-1 dedicated transport combination is functionally
8 the same as MegaLink. Do you see that?

9 A Yes, I do.

10 Q So the functional equivalence of the DS-1 combo
11 and MegaLink was undisputed in this proceeding, wasn't it?

12 A That is my understanding. That is what I was
13 confirming earlier with my answer, as well.

14 Q I mean, the functional equivalence issue was not
15 something that was fraught with the potential for dispute,
16 was it?

17 A Not that I am aware of.

18 Q Do you have your deposition transcript in front
19 of you?

20 A I believe so. Hold on.

21 Q If not, I can get it to you.

22 A I have it.

23 Q For the record, your deposition is Exhibit 5 in
24 this hearing. And I am going to ask you to take a look at
25 Exhibit 1 of your deposition, if you can have that in

1 front of you?

2 A That is what I don't have. I may, hold on a
3 second.

4 No, the exhibits are not attached here, I'm
5 sorry.

6 Q I don't have attachments to it, either. Do you
7 have that in front of you now, Mr. Pate?

8 A Yes, I do.

9 Q Now, this exhibit to your deposition consists of
10 two BellSouth responses to data requests in our North
11 Carolina arbitration case, is that right?

12 A That's correct.

13 Q And the responses to these questions would be
14 the same for Florida as for North Carolina, wouldn't they?

15 A Yes, they would.

16 Q Now, in Item 1, WorldCom asked for BellSouth to
17 list the services that it provides to itself
18 electronically or partially electronically, is that
19 correct?

20 A That's correct.

21 Q And then at Pages 5 and 6 of Item 1, BellSouth
22 listed the business services that can be ordered
23 electronically or partially electronically by BellSouth's
24 retail units?

25 A Yes.

1 Q And you were involved in preparing these
2 responses?

3 A Yes. My staff under my direction prepared these
4 responses with the input from the retail units.

5 Q On Page 6 of Item 1, you have listed MegaLink
6 circuit as one of the services that BellSouth
7 representatives can order electronically or partially
8 electronically, is that right?

9 A MegaLink circuit point-to-point, and let's be
10 clear that the way this was represented here it can be
11 ordered through the regional ordering system, known as
12 ROS. That is the system that our business units utilize.

13 Q As I --

14 A I'm sorry. I just wanted to say --

15 Q Sure.

16 A -- we were trying to also clarify. We use the
17 term from the request of partially electronic to signify
18 that we have a system that is being utilized where a
19 representative is sitting actually at a presentation
20 screen and developing this order. But I don't want to
21 leave the wrong impression. It is not electronic in terms
22 of a translation of that order as you would think from a
23 local service request. There is a significant difference
24 here.

25 Q Mr. Pate, when a BellSouth rep uses ROS to

1 prepare a MegaLink order, that rep can bill the order
2 using point and click technology, and then can hit,
3 essentially, a transmit key and transmit that order
4 electronically, can't he?

5 A For the most part, yes, and particularly in this
6 one that we have listed, which is the MegaLink circuit
7 point-to-point. It uses work flows, so it is a type of a
8 screen that comes up that says, do these steps first and
9 it gets to the next screen when that's completed. And
10 there are some limited, I'm sure, free entry type things
11 that they would have to enter, as well. However, there
12 are other MegaLink items listed in this data request, this
13 next one, Item 2, channelized MegaLink and there is
14 something else on here. I'm searching for it, another
15 MegaLink reference.

16 Q Referring to MegaLink ISDN, I believe?

17 A Yes. And those, there are no type of work flows
18 built within ROS, so everything is a free entry type form
19 through that presentation system, that presentation layer
20 within ROS. But the significant thing you need to
21 understand is this is building nothing more than an
22 already acceptable formatted order that the service order
23 communications system, SOCS, can accept directly. So it
24 is transmitting an order built in the proper format for
25 provisioning by our systems.

1 Q Let me follow up on one point you just made,
2 Mr. Pate. One of the features of a DS-1 combo is the
3 ability to have 24 channels that are, in effect, 24
4 telephone lines going over the circuit, is that right?

5 A That is my understanding, yes.

6 Q And the way that you channelize a DS-1 circuit
7 is by having electronics at either end, is that right?

8 A That is my understanding. You're about to get
9 beyond my level of expertise.

10 Q Well, mine, too. Let's see if we can push it
11 just a little bit further.

12 When WorldCom orders a DS-1 circuit, assuming
13 that we are ordering it from the customer premises where,
14 you know, either WorldCom or the customer has electronics
15 on its end, and that circuit goes to the WorldCom switch,
16 we would have no need for BellSouth to provide the
17 channelization in that circuit, would we?

18 A I don't know. You are getting in an area beyond
19 my expertise.

20 Q Until just recently BellSouth permitted WorldCom
21 to submit DS-1 combo orders using an electronic ASR
22 process?

23 A Well, until recently that's the mechanism that
24 was utilized. But, once again, as I stated in my summary,
25 you really were not ordering a DS-1 combination. You were

1 ordering access tariff, a special access tariff. And then
2 we were crediting, and still are crediting, your bill at
3 the UNE rates. So it's just a mischaracterization to
4 think that the ASR process was really ordering
5 combinations, the DS-1 combos.

6 Q Do you know when BellSouth first made the manual
7 LSR process available for ordering DS-1 combos?

8 A The manual process defined clearly -- I think
9 it's a May 2000 information. I may even have it here with
10 me. As a matter of fact, I do. May 15th, 2000, unbundled
11 dedicated transport for EELs, CLEC information package.

12 Q And just so we are clear, then, this Commission
13 ordered BellSouth to provision DS-1 combos back in May of
14 1999, as you will recall from the order that we have
15 distributed, that is right, isn't it?

16 A That is what the order says, yes.

17 Q The only way, certainly from May '99 to May
18 2000, that WorldCom even had to order a DS-1 combo was
19 using the ASR process, correct?

20 A That was what was being defined. I think that
21 is what we continue to use as a result of the Commission's
22 order.

23 Q Isn't it fair to say that we were using the ASR
24 process to order DS-1 combos?

25 A Well, I don't want to -- please, I wasn't trying

1 to mischaracterize any intent on behalf of MCI. You were
2 using the process defined at that point in time, but the
3 process has also now been redefined as a result of the UNE
4 remand order and the products that have come out of that.
5 And we are trying to use now the standard format. There
6 is no trying, we are going to use the standard format,
7 which comes out of OBF, which is the local service
8 request, the LSR. We have every 319 UNE remand product
9 defined for that process of which this is one.

10 Q Well, in fact, today BellSouth requires WorldCom
11 to use the manual LSR process to order DS-1 combos, isn't
12 that right?

13 A MCI as well as all other ALECs.

14 COMMISSIONER JABER: So to answer his question,
15 Mr. Pate, they were using the ASR process to order their
16 DS-1 combinations?

17 THE WITNESS: They were using that process
18 because that is what existed. But what I am trying to get
19 clear is really they weren't ordering DS-1 combinations.
20 We had to then -- BellSouth had to then do additional
21 steps to -- at this point they were just crediting the
22 bill at the UNE rate. And there should have been another
23 action taken, that is to convert those to the
24 combinations. And MCI, we have had a challenge getting
25 them to give us the information to do that actual

1 conversion even. So they continue to have the special
2 access which we credited their bill for.

3 COMMISSIONER JACOBS: That is what BellSouth has
4 to do. What WorldCom was able to do was order the
5 combinations through the ASR process.

6 THE WITNESS: We put a methodology in place --

7 COMMISSIONER JABER: Is the answer yes?

8 THE WITNESS: Yes, what I have said. We put
9 that methodology in place for them to order --
10 essentially, they are ordering a DS-1 combination from
11 their perspective, but the reality of it is, it's not; it
12 is special access, because that is the only process we had
13 in place at that point in time.

14 BY MR. O'ROARK:

15 Q Mr. Pate, we are going to hand --

16 COMMISSIONER JACOBS: Can I ask a question?

17 And so now the requirement would be that they
18 order the DS-1 and the DS-1 transport through the LSR and
19 that is going to be like a complex service that is going
20 to fall into the manual process, right?

21 THE WITNESS: That's correct.

22 COMMISSIONER JACOBS: Okay. Now, the MegaLink
23 service continues to be available through an ASR process,
24 or a similar process, is that correct?

25 THE WITNESS: No, sir. If they were actually

1 going to order MegaLink, that would be a resold service.

2 COMMISSIONER JACOBS: I see.

3 THE WITNESS: They would order that via the LSR,
4 as well.

5 COMMISSIONER JACOBS: But it's the same
6 functionality, isn't it?

7 THE WITNESS: The same functionality. This just
8 gets to, you know, whether you are going to be more of a
9 facility-based provider and develop your own services
10 using unbundled network elements. What I am hearing the
11 argument here is they are going to use unbundled network
12 elements to provide an equivalent MegaLink service to
13 their end user.

14 COMMISSIONER JACOBS: Okay.

15 COMMISSIONER JABER: And isn't that what the
16 order allowed them to do, though? See, in fact, they
17 don't call you and say we are ordering MegaLink, do they?
18 They call you and say we want a DS-1 combo?

19 THE WITNESS: Yes, and I'm not disputing that.

20 COMMISSIONER JABER: And the order allows them
21 to order -- our order allows them to order the unbundled
22 network elements and combine them to recreate a service
23 similar to MegaLink?

24 THE WITNESS: The order does, sure. There is no
25 dispute there with what they're ordering and how they

1 utilize it. That's their business.

2 BY MR. O'ROARK:

3 Q Mr. Pate, we are going to hand you an exhibit
4 that we are going to ask to be marked as Exhibit 32. Do
5 you have this in front of you?

6 (Exhibits 32 marked for identification.)

7 A Yes, I do.

8 Q And is this a letter dated August 28, 2000, from
9 Pat Finland of BellSouth to Ron Martinez of WorldCom?

10 A Yes, it is.

11 Q And you have seen this letter before, haven't
12 you?

13 A Yes, I have.

14 Q In this letter BellSouth tells WorldCom that
15 after September 5th, 2000 it will no longer accept
16 electronic ASRs for DS-1 combos, is that right?

17 A That is correct.

18 Q And, in fact, on Page 2 of this exhibit, if you
19 look at the final partial paragraph beginning with the
20 second sentence, it says that all future orders for new
21 circuits placed using the ASR process electronically after
22 this date will be considered special access service, is
23 that right?

24 A That is correct.

25 Q And just so we are clear, I believe Commissioner

1 Jacobs asked a question about orders falling out from
2 manual processing. The process that BellSouth wants
3 WorldCom to use is a purely manual process, isn't it?

4 A To be submitted manually, yes, via LSR.

5 Q In other words, we are going to fax -- or as
6 BellSouth would have it, we would fax LSRs over to
7 BellSouth, right?

8 A You would fax it to our local carrier service
9 center, who then in turn would process that order.

10 Q Just one more thing on this exhibit, Mr. Pate,
11 if I can get you to flip to the very first page. The
12 final paragraph beginning BellSouth is in full compliance
13 with the above. Mr. Finland goes on to state your
14 assertion that BellSouth retail units order MegaLink
15 service electronically is simply incorrect. You would
16 agree, wouldn't you, this is referring back to our
17 previous discussion, that BellSouth representatives do
18 order MegaLink using the electronic ROS system?

19 A They order MegaLink using the ROS system. The
20 issue here is how we are defining electronic. Now, once
21 again, this is an important distinction. Electronic there
22 means they are using a system to just enter the order.
23 You have got to enter it somewhere. Then that system
24 transmits that formatted order that is acceptable for our
25 downstream provisioning systems. That's not the same as a

1 local service request, which is coming in that OBF format
2 that then has to be translated into a SOCS acceptable
3 format, which is what ROS builds. That SOCS acceptable
4 format is critical. That is what we have to have received
5 by our downstream systems for provisioning. That is what
6 generates the FOC once we had that acceptable format
7 built.

8 Q But just so we are clear, when the WorldCom rep
9 sits down to do a DS-1 combo order, he gets out pencil and
10 paper or what have you, fills out the LSR form, feeds it
11 into the fax machine, and it goes to BellSouth. When the
12 BellSouth rep wants to order a MegaLink private line
13 circuit, which is the functional equivalent, the BellSouth
14 rep bills the order using the ROS system and then submits
15 it electronically to BellSouth's SOCS system, correct?

16 A Correct from the standpoint of the way you
17 described it, but let's make sure everyone understands.
18 The ROS system is fairly new. They used to use the DOE
19 system, direct order entry, which is the same system that
20 is utilized today in the LCSC. You have got to input
21 these orders through some system. You've got to get it
22 into the service order communication system. That is what
23 ROS is doing. ROS has just provided some more
24 functionality to the business retail units, and they have
25 developed that system to replace DOE.

1 Q But BellSouth doesn't even allow WorldCom to
2 have access to the DOE system so that WorldCom could even
3 use the old system to submit the DS-1 combo order
4 electronically, does it?

5 A Well, that's a yes and no answer. I mean,
6 BellSouth has offered many times for those of interest to
7 let's sit down and talk about it if you want access to
8 DOE. Frankly, I don't think you do; that is your
9 decision, but I know other ALECs have said they don't and
10 there are several reasons why. Once again, this system is
11 archaic. It is more of a DOS format. It's not the point
12 and click windows-based technology that is the ease of
13 ordering and most people are accustomed to using today.
14 The other is it is not built using that local service
15 request standard format, which is what someone,
16 particularly, I would think, like MCI that is going to be
17 ordering throughout the nation wants to utilize so that
18 what they process with BellSouth, as well as what they
19 process with Verizon or Southwestern Bell, would be the
20 same format. And those are the main limitations there,
21 so we haven't found anybody that really has an interest to
22 do that.

23 Q Let me ask you this, Mr. Pate. Does BellSouth
24 have any current plans to make the LSR process for
25 ordering DS-1 combos electronic?

1 A That is a yes/no answer, too. The yes being
2 that we are looking at all the 319 products. The no being
3 it is not anywhere that I have seen scheduled currently.
4 But we're trying to look at what we can get done from a
5 mechanization of the products that came out of the UNE
6 remand order sometime next year. But I just have to tell
7 you it is not scheduled anywhere that I have seen.

8 Q And what BellSouth did was it chose to shift us
9 to the manual LSR process before it even had a concrete
10 plan to develop an electronic LSR process, isn't that
11 right?

12 A If you want to put an emphasis on concrete
13 plans, meaning it is not scheduled, I will agree with that
14 statement.

15 Q It is true, isn't it, that BellSouth has adopted
16 special business rules for use in filing out the LSR form
17 for a DS-1 combo?

18 A I don't quite understand special business rules.
19 A business rule is a business rule.

20 Q Well, can we agree that the LSR form -- strike
21 that.

22 Can we agree that there is no industry standard
23 way to use the LSR form for a DS-1 combo?

24 A We can agree with that, and that is quite
25 common. That is nothing unique. You sometimes have to .

1 | purge forward and create these and then also be the leader
2 | to take it back to the creation of industry standards. If
3 | we waited for everything to be industry standard, then a
4 | lot of things wouldn't be electronic.

5 | Q I had understood you to say in Georgia that
6 | BellSouth had developed business rules that would enable
7 | ALECs to use the LSR form to order DS-1 combos. Did I
8 | misunderstand you?

9 | A Restate that for me, please.

10 | Q I had understood you to say in Georgia that
11 | BellSouth had developed business rules for ordering DS-1
12 | combos via the LSR. Did I misunderstand you?

13 | A No, you didn't misunderstand. What I was trying
14 | to get an understanding from what I heard you said
15 | earlier, you used the term "special business rules." And
16 | to me a business rule is a business rule. There is
17 | nothing special about it. That is the business rule for
18 | how you go about making those entries for ordering
19 | whatever the business rule is for. And that is not just
20 | for Georgia. I mean that business rule as developed would
21 | be applicable throughout the region.

22 | Q And the point is that those business rules are
23 | not standardized on a national level, are they?

24 | A No. And what I'm saying is there are a lot of
25 | things that are not standardized on the national level, .

1 and you can't wait for that, otherwise you wouldn't have
2 these business rules.

3 Q Let's talk a little bit about some services
4 other than DS-1 combo.

5 A Sure.

6 Q And let me refer you back to Exhibit 1 of your
7 deposition. You will recall that there were two data
8 requests. Thus far we have been talking about Item 1.
9 Let's shift focus a little bit and talk about Item 2. Do
10 you have that in front of you?

11 A Yes.

12 Q Now, in Item 2, BellSouth lists what it
13 considers to be its complex services, is that right?

14 A Yes.

15 Q BellSouth uses that same ROS interface that we
16 discussed before to submit orders for complex services
17 electronically, although for the most part without the
18 point and click technology, is that right?

19 A For the most part without the point and click
20 technology, that is correct. They are building an order,
21 free-hand building an order, just like they did in the DOE
22 system, essentially. You are looking at almost screens
23 that are identical, just a prettier presentation, for lack
24 of a better technical term.

25 Q And once the rep has built that order, the rep.

1 pushes the equivalent of a transmit key and that order is
2 then submitted electronically to BellSouth's SOCS system,
3 is that right?

4 A It is transmitted electronically just like the
5 DOE system did it. Once again, you have got to enter it
6 somewhere. You have got to get it in and that's what that
7 does.

8 Q And for most of the services listed by BellSouth
9 in Item 2, WorldCom must submit the order manually to
10 BellSouth, is that true?

11 A That's right. It's getting back to what I was
12 saying earlier, these are the complex orders where we
13 haven't figured out how to do that translation of a local
14 service request so that it can be mechanically,
15 electronically translated from an LSR format to that SOCS
16 compatible acceptable format. So we have to take that
17 LSR, our representatives are trained in the local carrier
18 center to then sit at the terminal using DOE for the State
19 of Florida, and enter that into that SOCS compatible
20 format.

21 Q Let me ask you about a couple of other things.
22 Let me tie up one loose end from yesterday. I believe
23 Ms. Cox was asked a question that was deferred to you.
24 Does BellSouth provide electronic access to loop
25 qualification information for its retail reps?

1 A Not for its retail reps, they do not. There is
2 access for -- and more the outside plant engineering, the
3 people, that is part of their day in and day out job. But
4 the retail representatives, no.

5 Q I assume the same goes for ALECs, then, also?

6 A Yes. These are the same people, if they were
7 doing loop makeup information, these are the same design
8 engineers that would access the systems to pull down that
9 information to give to the ALECs.

10 Q I used the term "loop qualification
11 information." If I used the term "loop makeup
12 information," would your answers be the same?

13 A Yes. I was speaking from the same terminology.

14 Q When will that process be electronic for
15 BellSouth retail reps?

16 A Actually a release took place July 29th for loop
17 makeup information to be electronic, so we put it in place
18 then. But we are beta testing that with six data local
19 exchange carriers. And that beta testing probably will
20 last somewhere between another 30 to 45 days. It hasn't
21 gone as fast as we had hoped, frankly. A lot of that is
22 just getting some of the data LECs ready with changes to
23 their system to do the beta testing itself. You have a
24 LENS, local exchange navigation system, as well as TAG
25 system for this beta testing. LENS we are pursuing very .

1 well through because BellSouth controls those updates.
2 The TAG component, the individual ALEC or data LEC in this
3 case has to do system enhancements to get their system
4 ready, and that has slowed the process down a little bit.

5 Q Mr. Pate, Mr. Milner and I are going to have a
6 chance a little later this morning to talk about operator
7 services and directory assistance routing. I want to ask
8 you some specific questions about how that is ordered.

9 Let's focus first -- we are going to -- I will
10 discuss with Mr. Milner in more detail what these terms
11 mean, but let's just keep it short for now. Using the --
12 let's say an ALEC wants to use the line class code method
13 of selective routing. Can that be ordered electronically
14 today?

15 A No, not electronically today.

16 Q When will an ALEC be able to order that
17 electronically?

18 A I'm not sure. I don't know.

19 Q Let me take a step back. Let's just talk about
20 selective routing of OS/DA traffic in general. Can an
21 ALEC order that electronically today?

22 A No, not that I am aware of.

23 Q And the same follow-up, do you know when that is
24 going to be available?

25 A No. This is something that's being looked at .

1 right now as we speak, but I don't have any particular
2 target dates or something I can share with you.

3 Q Does such a target date exist or -- let me put
4 it another way. Do you know whether such a target date
5 exists?

6 A No, I don't.

7 Q The same question on the AIN hubbing method, is
8 that something that can be ordered electronically today?

9 A I have no idea on that one.

10 Q And then, finally, there is something called the
11 OLNS method that I will get into with Mr. Milner, which,
12 as I understand it, doesn't exist today. But my question
13 to you is do you know whether BellSouth plans to enable
14 CLECs to order that electronically?

15 A I don't know.

16 Q When a BellSouth retail rep, let's say on the
17 residential side, orders service for a residential
18 customer, that BellSouth retail rep does not have to place
19 a separate order for operator services, directory
20 assistance, does he?

21 A Not that I am aware of, no.

22 Q And however BellSouth -- the BellSouth rep
23 orders OS/DA, assuming there is some separate notation
24 that it was required, that is done electronically, isn't
25 it?

1 A Well, the difference here, and Mr. Milner can
2 speak better to it, we are routing all of ours the same
3 with BellSouth platforms, so there is no need to develop
4 anything unique or different. It is just the way it has
5 always been designed and it routes there, essentially, by
6 default.

7 Q So as a result of BellSouth's network design, no
8 separate manual ordering process for OS/DA is necessary,
9 is that correct?

10 A That is my understanding, but I am not the
11 subject matter expert in that area.

12 Q Let's move on to the issues you did talk about
13 in your summary, starting with Issue 80. That issue
14 concerns whether BellSouth should be required to provide
15 an application-to-application ASR inquiry process?

16 A Yes.

17 Q And I believe you mentioned in your summary that
18 an ASR can be used to order local interconnection trunks.
19 We have no dispute there?

20 A No dispute there, yes.

21 Q Let's go back to MegaLink for a minute. When
22 BellSouth orders MegaLink, which we have -- as we have
23 discussed is functionally the same as a DS-1 combo, the
24 BellSouth rep is able to use that point and click
25 technology to electronically transfer preordering

1 information from BellSouth's databases to the BellSouth
2 service order, is that right?

3 A Essentially, yes. They pull down the
4 information from the same databases that the ALECs get the
5 information utilizing TAG and LENS.

6 Q In North Carolina and Georgia you testified that
7 you believe that BellSouth's TAG preordering interface
8 could be integrated with the ASR interface, is that right?

9 A Yes. Looking at it, and I will have to admit
10 looking at it at a high level, since TAG uses CORBA, that
11 is the industry protocol, common object request brokering
12 architecture, and it is clear that you can take the CORBA
13 transmission utilizing TAG on a preordering basis and
14 integrate that into EDI, as well as the TAG ordering
15 interface. So that technology, that protocol alone, there
16 is no reason why it couldn't be mapped, we don't think, to
17 the ASR if someone chose to do so.

18 Q If TAG and the ASR ordering process were
19 integrated, WorldCom would be able to take preordering
20 information, such as a customer address, and prepopulate
21 an order with it, is that right?

22 A Yes. And what we are saying is, and I think I
23 mentioned it in my rebuttal, is MCI if they decide to do
24 so, you have the sophistication definitely in your IT
25 department that you could do that. That is what we think

1 is feasible.

2 Q And just so we are clear, prepopulate means to
3 electronically transfer the information to an order so
4 that you don't have to type it in?

5 A Yes, prepopulate. You've heard me use the word
6 integrate, the same concept. I think Ms. Lichtenberg
7 talked about the importance that it doesn't require a
8 human to touch it, so that information gets transmitted
9 directly to the order.

10 Q That helps prevent mistakes and rejections?

11 A It potentially could, yes, I would think so.
12 You are getting it from the database where the information
13 is supposed to be correct. And by avoiding a human step,
14 someone has to retype that, that could avoid potential
15 errors.

16 Q You would agree, wouldn't you, that if BellSouth
17 provides WorldCom with the ability to integrate the TAG
18 preordering interface with the ASR ordering interface,
19 that wouldn't do us much good if we can't order a local
20 product like the DS-1 combo with an ASR?

21 A Yes, I would agree with that.

22 Q Let's talk about Issue 81, which concerns the
23 service inquiry process?

24 A Certainly.

25 Q Among other things, the service inquiry process

1 enables a carrier to determine the availability of
2 facilities and the location of facilities?

3 A Yes.

4 Q That could be important so that the carrier can
5 tell its customer whether facilities exist or provide the
6 service in question or whether there will be a delay until
7 those services can be installed?

8 A That is a way it could be utilized, yes.

9 Q In the location of facilities it would be
10 helpful information to a customer, so that it would know
11 whether it could have redundancy in the network serving
12 it?

13 A That is one thing, yes.

14 Q BellSouth has information about the availability
15 and location of facilities in various electronic
16 databases, is that right?

17 A Yes.

18 Q One of those is known as the local facility
19 assignment control system, or LFACS?

20 A That is correct. That's the same system where
21 we talked about loop makeup information would reside.

22 Q Generally, loop facilities information is stored
23 there?

24 A Yes. It inventories the loop information, as
25 well as assignments of those loops.

1 Q And BellSouth has something called the map
2 viewer which provides electronic access to plats?

3 A For those plats that are stored electronically,
4 which is the case for the State of Florida, it accesses
5 the BellSouth corporate facilities database where the
6 plats reside. Map viewer is a software application that
7 would then go and get that information.

8 Q Then another database is called TIRKS, the trunk
9 integrated record system, which has trunking information?

10 A The trunk integrated record-keeping system,
11 TIRKS, and that has information for those designed
12 circuits.

13 Q Each of these databases can be accessed via a
14 terminal, is that right?

15 A Yes.

16 Q That is done by a BellSouth outside plant
17 engineer?

18 A Yes. When you say "a terminal," I mean, it's a
19 terminal that is dedicated to that database from which it
20 is accessing that information. So it is just not like a
21 computer you would have sitting in your home obviously.
22 It's dedicated to that specific database.

23 Q Now, WorldCom does not have access to facilities
24 availability and location information on a preorder basis,
25 is that right?

1 A Well, loop makeup is coming as we just discussed
2 earlier. So from the standpoint of what's in LFACS, you
3 will soon have that available to you. You have it
4 available to you today manually. It is a manual process.
5 You would have to submit that service inquiry.

6 Q Let's put loop makeup information aside and just
7 talk about information concerning the availability of
8 loops and the location of facilities.

9 A All right.

10 Q I mean, that is not available to us today, is
11 it?

12 A Today that is not available to you on a preorder
13 basis.

14 Q And as a practical matter what that means is
15 that we can't tell our customers about facilities
16 availability and location while we are trying to make a
17 sale?

18 A That is correct, which is the same process
19 utilized for BellSouth retail units, as well.

20 Q In North Carolina and Georgia you testified that
21 the BellSouth personnel working with the BellSouth account
22 team does have access to facilities availability and
23 location information on a preorder basis, at least for
24 large business customers?

25 A What they have access to is a system where they

1 can send the request out to outside plant engineering to
2 get information, very seldom used from my personal
3 conversations with the people in major accounts, our large
4 business accounts. And the reason very seldom used is it
5 doesn't give you any reservation of those facilities, and
6 that is the key to ordering, is how would you reserve it,
7 hold those facilities. So they seldom use it. It is
8 primarily used for service inquiry associated with when
9 you are going to do an order, which is what is identified,
10 as I said in my summary, in the product and services
11 interval guide, as well.

12 Q The BellSouth person that can make that request
13 of the outside plant engineer would be a systems designer
14 or a services consultant that assists the BellSouth team
15 in developing proposals?

16 A Yes.

17 Q There is no limit to that person's ability to
18 obtain facilities availability and location information
19 from BellSouth's account team, is there?

20 A I don't know whether there is a limit or not. I
21 know that the system is available to them, whether there
22 is any limitations that they put on from a managerial
23 standpoint, I don't know.

24 Q That is a little different from what you told me
25 in Georgia, Mr. Pate. Can I show you your Georgia

1 testimony?

2 A Certainly.

3 Q Mr. Pate, I have directed you to Page 704 of
4 your testimony in Georgia. Let me give you a moment to
5 look at that.

6 A Yes. Just let me -- give me one second, please.

7 (Pause.)

8 Okay. I'm ready.

9 Q In Georgia we were talking about this same Issue
10 81 and the same person who has access to the outside plant
11 engineer, and I asked you at Line 21, "So to your
12 knowledge, there is no limitation on that person's ability
13 to get facilities and location information from the
14 outside plant engineer, is that correct?" And your answer
15 was that to your knowledge that was correct, and then you
16 went on from there.

17 A Yes. I don't think my answer is any different.
18 I mean, I said there to my knowledge. And I'm saying here
19 still to my knowledge. And I said, I don't know, they may
20 place some limitations, but to my knowledge I don't know
21 whether they do or not. And that would be more of
22 probably an internal management. So I don't think I am
23 giving you a different answer.

24 Q Well, as you sit here today, to the best of your
25 knowledge, there are no such limitations, correct?

1 A That's correct. And I don't know if they do
2 have any, but to my knowledge, there is not.

3 Q And, as we are here today, BellSouth does not
4 have a process that would give WorldCom similar access to
5 facilities availability and location information, does it?

6 A That is correct. And I think we have also said,
7 it was either in this proceeding, in Georgia, or maybe in
8 North Carolina, that BellSouth would welcome MCI to bring
9 that to the change control process and have that reviewed
10 to see if there is a community of interest, and that is
11 where we want to put our resources to develop such.

12 Q Well, Mr. Pate, in your summary you said that
13 BellSouth gives WorldCom access to preordering information
14 in substantially the same time and manner as BellSouth, do
15 you recall that?

16 A Yes, I do.

17 Q Well, if BellSouth has unlimited access to this
18 information and WorldCom has no access to the information,
19 that is not exactly parity, is it?

20 A I don't see that there is a parity issue here.
21 Once again -- first off, this is the first time this
22 request has been made from any ALEC. This comes from MCI
23 as a result of this arbitration proceeding. As a result
24 of that, when we had our deposition, you and I, you asked
25 me questions around this. At that point in time, I stated

1 I wanted to go back and talk further with our large
2 business units as to what they were doing, because I
3 wasn't certain based on some things I had heard. As a
4 result of going back and my personally looking into it, I
5 came back and said there is a system where they use seldom
6 to go out and make a request. That is as much as I had my
7 hands around that to describe it is seldom used. So from
8 that standpoint, if you are going to say they have
9 something that they seldom use or can use, if you want to
10 say that is not at parity, that is when I have said, well,
11 if it is something the ALEC community would like as a
12 whole, we will entertain developing that. Bring it to the
13 change control process and let's look at it.

14 Q Can we agree, Mr. Pate, that WorldCom has been
15 requesting this service inquiry information from BellSouth
16 in connection with our negotiations of the interconnection
17 agreement that have gone back several months now?

18 A Well, I'm sure it has, that is why we are here
19 today.

20 Q I mean, you don't dispute that WorldCom is
21 entitled to the same ability to access this information as
22 BellSouth is, do you?

23 A I don't dispute that, no.

24 Q Let's talk about Issue 90, which has to do with
25 completion notices, as you will recall. When BellSouth

1 turns up a service for a retail customer on a dispatch
2 order, the BellSouth person uses a hand-held terminal that
3 transmits the completion status electronically to
4 BellSouth's billing systems, is that right?

5 A Essentially, yes. The technician would make
6 some entries into his terminal that would say, I have
7 completed this installation or whatever.

8 Q And, likewise, if a dispatch is not required,
9 BellSouth has another means to transmit the completion
10 status to BellSouth's systems?

11 A Yes.

12 Q Electronic notification of completion is
13 important so billing can be started?

14 A Billing started, the actual customer service
15 record information updated if that service is being
16 provided to that customer.

17 Q And BellSouth's maintenance and repair system is
18 automatically updated to reflect the new service?

19 A Certainly.

20 Q BellSouth provides information on ALEC service
21 order -- excuse me, on its CLEC service order tracking
22 system known as CSOTS?

23 A CSOTS, yes.

24 Q And that provides completion information on a
25 website?

1 A That is one of the things it provides. It
2 provides a lot of other information, as well, of which for
3 the purpose of our discussion here that is an item that
4 would be available daily for you to look at.

5 Q And to use CSOTS, WorldCom would have to take
6 the information from the website and distribute that
7 information to WorldCom's systems somehow?

8 A Somehow. I don't know how your systems operate,
9 but, yes, you would retrieve that information and do with
10 it whatever it is you need to do.

11 Q Can you tell by looking at the CSOTS web screen
12 whether the orders that you are looking at are manual or
13 electronic?

14 A No.

15 Q And when you look at that web screen, what is
16 the presentation? Do you have to do a query on an
17 order-by-order basis, or do you get a list of orders?

18 A Well, you look -- it is an exhibit we have here
19 as part of my testimony, and it is very well displayed.
20 But initially you will get a screen that comes back with a
21 matrix that shows you by state the number of orders and
22 different statuses that you can retrieve. And then you
23 can do -- essentially, point, click and get down to the
24 detail level PON-by-PON information in those status
25 categories.

1 Q PON is a purchase order number --

2 A Yes. Thank you.

3 Q -- which would identify an order?

4 At what point are completed orders removed from
5 CSOTS?

6 A I don't know how long it is archived. It's
7 getting that information out of the service order
8 communications system, so I don't know how long that
9 archives and stays there for you.

10 Q So to use CSOTS, what we are going to have to do
11 is click on the web screen or the website and then cull
12 out the manual orders each time?

13 A You used the words "cull out," I mean, you would
14 know, I would think, from your systems, they should be
15 fairly sophisticated with your IT technology, which orders
16 you would be specifically looking for. You would know
17 your PON numbers. If you mean matching up those PON
18 numbers, I would agree with that.

19 Q Let's talk about Issue 91, which has to do with
20 FOCs and intervals. BellSouth's practice in most cases is
21 not to do a facilities check before it returns a firm
22 order confirmation?

23 A That's right, in most cases. The only cases
24 where it does do that is if there is a service inquiry
25 associated with that order. Then, obviously, the process

1 of doing the service inquiry would be verifying the
2 facilities are there.

3 Q A facilities check is an electronic check to
4 make sure that BellSouth's records show there are
5 facilities available at the location?

6 A It can be described as that, yes.

7 Q And I believe you described this in your
8 summary, but a firm order confirmation is what BellSouth
9 sends to WorldCom to confirm that a WorldCom order has
10 been accepted and will be submitted to BellSouth's
11 provisioning process?

12 A Yes, submitted to the provisioning process, the
13 first point of entry there, which is common to the retail,
14 and the ALECs is the service order communications systems,
15 SOCS.

16 Q And you understand that WorldCom's concern is
17 that we have experienced problems with the loop cutover
18 process when we learn shortly before the scheduled cutover
19 that facilities are not available?

20 A That is what you have stated to me in prior
21 proceedings. I haven't personally looked at any data.

22 Q And you understand that WorldCom would like the
23 electronic facilities checks to help reduce those kinds of
24 incidents?

25 A That's what you have stated.

1 Q And that problem is a bigger problem or bigger
2 concern for ALECs than for BellSouth, because BellSouth,
3 at least historically, has not had to undergo the same
4 loop cutover process to win customers, is that right?

5 A I am not the expert to talk about the loop
6 cutover process, but they still have to go through a
7 process to establish that installation, which would still
8 be putting whatever circuits necessary in place to have
9 that transmission. So there is a process that they still
10 have to go to. So facilities availability is just as much
11 an issue under a BellSouth process as it would be for a
12 loop cutover under an ALEC process.

13 Q But the consequences for an ALEC can be, or more
14 particularly for the ALEC's customer can be more severe,
15 can't they?

16 A I disagree. I mean, if you don't have the
17 facilities, whether it be for a retail customer of
18 BellSouth or for an end user customer of an ALEC, from the
19 customer's view the consequences are the same.

20 Q Well, the consequences for an ALEC, the ALEC's
21 customer can be that if that loop is cutover from
22 BellSouth to, say, WorldCom, but there are not facilities
23 available, that customer is going to lose service, right?

24 A I'm not quite following your question, sir. Let
25 me see if I can answer it this way. If you are saying it

1 is an existing customer of BellSouth?

2 Q Yes.

3 A And then the facilities aren't available. If it
4 is an existing customer of BellSouth, and all you are
5 doing is converting that customer, I don't see that there
6 is an issue. You are converting that existing customer
7 over from BellSouth to MCI WorldCom.

8 Q But the process of converting the customer, at
9 least if it is served by a UNE loop as opposed to UNE-P,
10 is going to mean that at the BellSouth central office that
11 loop is going to swing from the BellSouth switch to the,
12 say, the WorldCom collocation cage, right?

13 A It could be, yes. You are getting beyond my
14 expertise, now.

15 Q One concern that BellSouth has with checking
16 facilities availability is that checking facilities may
17 delay BellSouth returning the FOC?

18 A Well, it definitely adds an additional step to
19 that whole process, without a doubt. So it could delay
20 that, yes.

21 Q And BellSouth is unwilling to change its systems
22 to check facilities in advance, even if it is given a
23 longer interval to return the FOC?

24 A Well, it is more than just unwilling. We have
25 never figured out how to do that on a realtime basis with

1 our system, ever. That would be a nice thing to have, but
2 over our years we haven't ever figured out how to do that.
3 Instead, the way we have managed that is essentially
4 through spare facilities out there trying to anticipate
5 where the demand is, working through the presumption that
6 facilities actually do exist. And that is the way
7 BellSouth has managed that for many years. And from an
8 overall standpoint has been able to that successfully. It
9 continues today, and the challenge, if there is not
10 facilities available, would be the same challenge for
11 BellSouth offering from a retail unit as it is for any
12 offering by an ALEC.

13 Q For BellSouth, typically, if you are already
14 serving a customer and there is a question about whether
15 facilities are there, what you are really talking about is
16 providing that customer with additional facilities,
17 correct?

18 A Could you please re-ask that? I'm sorry.

19 Q Sure. For BellSouth, when you are -- you have
20 got an existing customer, and there is some question about
21 whether there are additional facilities available, the
22 reason you want to know is because that customer wants
23 additional service, and you want to know whether you can
24 provide the additional service, right? I mean, that is
25 the typical business situation for you.

1 A I don't see that being a different situation for
2 us or MCI, so I don't quite follow your question.

3 Q Well, the downside is that if BellSouth operates
4 on the assumption that the facilities are there, and they
5 get there and the facilities aren't there, the downside to
6 your customer is that there is just going to be a delay in
7 getting that additional service, right?

8 A That is correct, in BellSouth as well as the
9 ALEC community.

10 Q Well, with the ALEC community, again, if that
11 loop is swinging from BellSouth to WorldCom, there can be
12 some different consequences, can't there, or are we
13 getting beyond your expertise?

14 A You are just getting beyond my expertise. I'm
15 not sure where you are going with that.

16 COMMISSIONER JABER: From a logical standpoint,
17 you would acknowledge that for a BellSouth customer
18 requesting additional service, you already have that
19 customer on your network. He is -- I use the word
20 "captive" loosely. He is a BellSouth customer already.

21 THE WITNESS: Correct.

22 COMMISSIONER JABER: Whereas, with an ALEC they
23 are attempting to get the customer away from BellSouth,
24 and you would acknowledge that the consequences of the
25 inability of not being able to transfer the customer to .

1 the ALEC is bigger than when you are unable to give your
2 already existing customer a new service. That's --

3 THE WITNESS: I think we are saying the same
4 thing. Yes, if we have the existing customer in place,
5 can we add services to that existing line? Assuming those
6 existing facilities had the transmission characteristics
7 associated with whatever they want to add, the answer is
8 yes.

9 BY MR. O'ROARK:

10 Q Let's move on to Issue 96-A, which concerns CSR
11 parsing.

12 COMMISSIONER JACOBS: Can we take a moment for a
13 break?

14 MR. O'ROARK: That would be fine.

15 COMMISSIONER JACOBS: Let's come back at 10:30.

16 (Brief recess.)

17 COMMISSIONER JACOBS: Mr. O'Roark, you may
18 continue.

19 MR. O'ROARK: Thank you, Mr. Chairman.

20 BY MR. O'ROARK:

21 Q Mr. Pate, let's talk about Issue 96, which
22 concerns CSR parsing. CSR stands for customer service
23 record?

24 A That is correct.

25 Q And the CSR contains information about the

1 customer, such as the customer's service address and the
2 features that customer has ordered?

3 A Yes.

4 Q And I believe you mentioned in your summary, but
5 parsing in this context means taking CSR information and
6 breaking it into small pieces of data, is that right?

7 A That is a way to describe it, yes.

8 Q And WorldCom wants CSR information parsed so it
9 can have this data automatically put into local service
10 orders, local service requests?

11 A Yes. They don't have to re-enter that
12 information when they pull down, as part of preordering,
13 the customer service record, is my understanding.

14 Q And I believe as you described in your summary,
15 BellSouth is able to provide information from its CSR
16 database so they can be parsed on a line-by-line basis?

17 A Yes. The line basis being the line of
18 information that is identified in that customer service
19 record.

20 Q And when we talk about a line of information, I
21 mean an example would be, say, the customer's street
22 address, 111 Maple Avenue Northeast, that line of
23 information you would get all of the letters in that
24 street address in one piece, is that accurate?

25 A That is what we mean by a line of information, . . .

1 yes.

2 Q And BellSouth's ordering systems are setup so
3 that if an order contains such lines of data, the order
4 can be processed for a BellSouth retail order?

5 A Yes. The systems, of course, they are legacy
6 systems. And then when they were designed years ago, they
7 were designed to accept it that way.

8 Q So using line-by-line parsing, BellSouth's
9 systems can automatically populate an order using data
10 taken from the CSR?

11 A That is what they are doing today, yes, the raw
12 system, and RNS for the consumer side, yes.

13 Q For most local orders, ALECs use local service
14 requests, also known as LSRs?

15 A Yes, they do.

16 Q And LSR, when you boil it down, is a form with
17 lots of blanks, sometimes called fields, that have to be
18 filled in or populated?

19 A Yes.

20 Q ALECs cannot automatically populate an LSR using
21 CSR data that has been parsed on a line-by-line basis, is
22 that right?

23 A Well, we are saying no, that is not right. We
24 are giving you the same stream of information from that
25 customer service record. And that information is uniquely

1 identified by those section identifiers, and it is
2 delimited; delimited meaning that there is something there
3 that tells you where there is breaks. A delimiter could
4 be a comma, a back-slash, or whatever. But we've
5 identified those delimiters, as well, so that if you
6 wanted to do the programming, as you get that line of
7 information, you could do such and break it down to that
8 level to populate the LSR.

9 Q Let's just make sure that we are all clear. And
10 to automatically populate the LSR, we would have to be
11 able to parse the CSR on a field-by-field basis, is that
12 right?

13 A Yes, the way the LSR is designed.

14 Q And, again, let's take our example of 111 Maple
15 Street Northeast. On an LSR, rather than having that one
16 line block of information, you are going to have a field
17 or a blank for the 111, the number; you are going to have
18 another blank for the street name; you are going to have
19 another blank for whether it is a street, or an avenue, or
20 a road, or what have you; and then you are going to have
21 another blank for if there is a directional like
22 northeast, is that correct?

23 A Yes.

24 Q And, again, so we are clear, if you use that
25 line-by-line parsing, you are not going to be able to fill

1 out those fields, are you?

2 A Well, let's be clear here. Using the line
3 information, it is delimited, and you could develop the
4 program to say, okay, I see the 111. Now, here is
5 something that identifies. The next thing I am going to
6 see is Maple. And then here is something that identifies.
7 The next thing I am going to see is street. You could
8 program that on your side to then break that down and
9 drive that to populate the LSR.

10 Also, let me just add one other additional bit
11 of information. I don't even think it came out in the
12 testimony, but this -- I want to make sure MCI is aware of
13 this. Address validation, I think Ms. Lichtenberg even
14 discussed this, is probably the most critical part of the
15 order, because that ties the facilities to a central
16 office, what is available. Where you really do -- as part
17 of the ordering process, that validation address is by
18 going to the regional street address guide, RSAG, which I
19 think MCI is getting a download. That information is
20 delivered to you in what you refer to as the field parsed
21 level. I call it subline parsing, the same thing. So
22 your street and number and address, all of that
23 information you get delivered to you today from RSAG
24 parsed at that level.

25 COMMISSIONER JACOBS: How is RSAG going to be .

1 made available?

2 THE WITNESS: RSAG is made available through
3 part of the preordering functionality, but also as part of
4 this arbitration and prior contracts, I know we are
5 working with MCI to give them a download of RSAG.

6 COMMISSIONER JACOBS: Okay.

7 THE WITNESS: But all ALECs have it, direct
8 access through that through using the LENS or the TAG
9 preordering interface.

10 COMMISSIONER JACOBS: I don't know why, but I
11 was under the impression that it wasn't available in LENS.

12 THE WITNESS: No, that is incorrect. You can
13 get that information -- all preordering functionality is
14 available through LENS.

15 COMMISSIONER JACOBS: Okay.

16 THE WITNESS: The issue, Commissioner, may be
17 whether or not you can integrate that information to the
18 order. LENS, we are not saying you can, even though we've
19 shown in the past ways to do it. TAG you can integrate
20 that information to the order.

21 BY MR. O'ROARK:

22 Q Let me go back and talk about line-by-line
23 versus field-by-field. And just so we are clear, I mean,
24 just looking at the level at which this information can be
25 parsed today, that is at the line-by-line level,

1 information parsed at that level could not be used
2 successfully to populate an LSR, could it?

3 A I think you asked me the same question. I am
4 going to give you the same answer. The information we
5 give back to you, the stream of data is at the line level.
6 But it is identified for you, and if MCI wished to develop
7 the programming to then parse it at that field level, you
8 can do so. It is the same stream of data that we provide
9 to our retail units. They may not parse it at the field
10 level because of the way the systems are designed there,
11 but we are saying you have the information where you can.

12 Q Let me come at it another way. Without that
13 programming, we couldn't populate an LSR?

14 A Without you developing that programming, you are
15 going to get the information just at the line level, which
16 is not in the design with the way the LSR format is.

17 Q Do you know of any carrier that has been able to
18 automatically populate an LSR using BellSouth's CSR data?

19 A I don't know that any carrier has worked with
20 it, but we have worked with our own outside developers.
21 We've talked about it before in prior proceedings, Alvion
22 (phonetic), that they showed that it could be done.

23 Q Well, what they did was parsing on a
24 line-by-line basis, right?

25 A No. No, they got it and parsed down to the

1 field level to show you could parse that information and
2 drive it to the LSR.

3 Q Mr. Pate, Alvion did not parse an entire CSR on
4 a field-by-field basis, did it?

5 A I don't know how far they went. What I recall,
6 and I wasn't close to it, that was early on when I came
7 into this position, but they proved that it could be
8 parsed. I know they did all the name, I know they did all
9 the directory listings, I know they did all the address.
10 That I recall very distinctively.

11 Q Give me one moment, Mr. Pate.

12 (Pause.)

13 Mr. Pate, I asked you about Alvion in your
14 deposition at Page 190. Do you have that in front of you
15 still? I will direct you to Page 190, beginning at Line
16 7. I'll give you moment to look at that, and then I want
17 to ask you about it.

18 (Pause.)

19 Have you had a chance to look at it?

20 A Yes.

21 Q Now, at Page 190, Line 7, I asked you:

22 To your knowledge, has anyone successfully
23 parsed a BellSouth CSR to the granular level along the
24 lines of RSAG?

25 And your answer was we did it ourselves sometime

1 back, if you recall those discussions, but I don't think a
2 CLEC ever did it.

3 Was that the outfit that Bill Stacey hired to
4 parse back in 1998?

5 Answer: Alvion.

6 Q: Alvion, but they only parsed line-by-line
7 level, right?

8 Answer: I think that is correct, which is what
9 is needed to do the order. Well, you're asking for a
10 further level, and I am not aware of anybody that has done
11 it.

12 That is what you told me in your deposition. Is
13 your testimony different today?

14 A That is correct. What I'm saying today is
15 different. Obviously -- and I can't recall the particular
16 discussion at this point in time, but it reflects it here.
17 I may have misstated it at that point in time, and I will
18 be glad to verify. But my understanding is they did get
19 it down to the line-by-line level -- excuse me, the field
20 level necessary to process that. Once again, I wasn't
21 involved with that, and I even said here, I think, that it
22 was -- that I wasn't. I think that is correct. That is
23 my understanding, yes.

24 Q BellSouth does not publish a manual telling
25 ALECs how to parse on a field-by-field basis, does it?

1 A I'm sorry, I couldn't understand your question.

2 Q BellSouth does not publish a manual telling
3 ALECs how to parse on a field-by-field level, does it?

4 A No, it does not.

5 Q Are you aware that Bell Atlantic does provide
6 CSR parsing at the field level?

7 A Verizon/Bell Atlantic has developed a parsing
8 engine to develop that. And what I mean by the parsing
9 engine is something they put in front of getting that
10 information. So when you go and make that request for the
11 customer service record, there is another step that does
12 that parsing it has provided. It is also my understanding
13 there was an issue of the time delay associated with that.
14 Some of the community was not pleased with that. They
15 actually in their performance measures, I think, have
16 additional time allotted to them for that.

17 Q But I am correct in my understanding that
18 BellSouth -- rather Bell Atlantic has provided
19 field-by-field parsing?

20 A That is my understanding. I haven't personally
21 looked at it.

22 Q Now, CSR parsing is one of the issues that has
23 been submitted to the change management process?

24 A Change control process, yes.

25 Q Let me ask you to take a look at your direct

1 testimony beginning at Page 34, Line 13.

2 Are you there?

3 A Yes, I am.

4 Q The request for parsing made to the change
5 control process was first submitted on August 12th, 1999,
6 more than a year ago, is that right?

7 A That's correct.

8 Q And if you look at Page 35, beginning at Line 1,
9 you note that this change request was prioritized, number
10 one, at the June 28th, 2000 change review meeting. Do you
11 see that?

12 A Yes, I do.

13 Q Is it fair to say there is a consensus in the
14 industry concerning the importance of CSR parsing?

15 A From the change control process, those
16 participating in that, if you want to say those represent
17 the industry, yes.

18 Q What is the status of the CSR parsing issue in
19 the change control process today?

20 A There was a meeting held just this week dealing
21 with that. I think it was conducted on Tuesday. That was
22 the initiation of getting the subteams formed to work with
23 this. At that meeting, my understanding is they have
24 requested by a given date here in the very near future for
25 the ALEC community to find their desires, and a meeting .

1 set -- I thought I wrote it down -- within the next couple
2 of weeks, two or three weeks for them to come back and
3 look at those requirements to then start to drive forward
4 to understand that to see what steps need to be taken.

5 Q Has BellSouth committed to providing CSRs parsed
6 at the field level?

7 A I don't think I can say that we have committed
8 wholeheartedly to doing that, but we are still way down --
9 we are down the path of going in that direction. Just the
10 commitment, because we haven't had the chance to totally
11 evaluate it yet, that commitment 100 percent has not come
12 out. What we have committed to is, as you said earlier,
13 the recognition that the ALEC community has this ranked as
14 a high priority from those that are participating in the
15 change control process, and we have committed to look at
16 that and drive forward with that community to see what we
17 can do. So my personal feeling here is that we are going
18 to do something, I just can't say what we have committed
19 to do in terms of developing a solution.

20 Q When do you project that BellSouth will complete
21 the project and have a solution for ALECs?

22 A That's hard to say, because we don't have the
23 requirements back to define that, the complexity of it.
24 This team itself will probably have that assessment done
25 within this next quarter or carry over potentially into .

1 the first quarter of next year to drive towards if it is
2 feasible to do a solution, something in place for parsing
3 next year. But I can't speak forward in advance of their
4 assessment.

5 MR. O'ROARK: Thank you, Mr. Pate. No further
6 questions.

7 COMMISSIONER JACOBS: Staff.

8 CROSS EXAMINATION

9 BY MS. CHRISTENSEN:

10 Q Mr. Pate, let me direct you to Issue 91. If I
11 understood your earlier testimony, BellSouth does not have
12 a realtime method for verifying facilities for its own
13 purposes, is that correct?

14 A That is correct, realtime being systems to go
15 and verify its own facilities. That's correct.

16 Q Is this a handicap in a competitive market?

17 A Well, we don't feel that it is a handicap, no.
18 This is the way we have done business for years. And now
19 as we have entered working with the ALECs, they are doing
20 -- utilizing the same systems, obviously, access to the
21 same information. It didn't handicap us for years. Is
22 there some management that you have to do associated with
23 that? Yes. But I don't view it as a handicap. And
24 understand that what we are talking about here, as I
25 understand the request, is they are not talking about

1 getting information for preordering; we are talking about
2 getting information for sales proposals. That is
3 definitely not a handicap. You are talking about complex
4 orders for the most part here, and these account teams
5 have been working with these businesses. If you are
6 talking about in high populated metropolitan areas,
7 typically, these facilities exist.

8 Q Is the realtime method issue a matter that the
9 change control process is looking at?

10 A No. No one has submitted the request. That is
11 what I have offered up into the other proceedings with
12 MCI, to submit a request. They are the first ones that
13 have asked for something for sales proposals. And that is
14 not a preordering functionality, and that has not been an
15 issue raised by anyone else.

16 Q Let me ask, since you are not using a realtime
17 method, is this method based upon the last business day's
18 records for checking the facilities?

19 A I don't understand your question, please.

20 Q You had discussed that it is not a realtime
21 method for verifying the facilities, BellSouth doesn't use
22 a realtime method. Can you explain how this information
23 is updated? Is it updated with the last business day's
24 information or something other than that?

25 A Well, what I mean by a realtime method is

1 someone is not sitting at a terminal that can do a few
2 punches and say, okay, for this particular service go to
3 all these databases. Do we have facilities in place? We
4 know with certainty that that can be put in place. It is
5 all done without human intervention, that is what I mean
6 by realtime.

7 What has to take place to do such is essentially
8 what a service inquiry is. And by the service inquiry,
9 the request has to be sent out to the appropriate
10 departments for them to go in the appropriate databases to
11 look to see what is available. So it would go out to an
12 outside plant engineer who might access LFACS, that we
13 discussed earlier, take a look at what type of loop is
14 there, and are the transmission characteristics of that
15 loop such that it can be provisioned as a DS-1 loop. That
16 might have to be manually done. It's not a realtime
17 system approach.

18 Q Is there any method or process that an ALEC can
19 follow to check those facilities? I know you had
20 described that it can put in a manual check, is that
21 correct, or a service request?

22 A There is not a process defined -- this is what I
23 want to be clear on. There is not a process defined for
24 an ALEC to submit this as part of developing sales
25 proposals. There is a process defined as part of

1 preordering, and that is currently the manual process.
2 There are certain ones identified, certain types of
3 products that you would order that require a service
4 inquiry associated with it. That is part of preordering
5 for doing the order itself eventually. There is not
6 anything built for developing information to assist you in
7 taking that information to an end user customer as part of
8 a potential sales proposal.

9 Q Well, let me ask you in regards to the
10 reordering process. If they have requested a facilities
11 check, can you explain, if you know, what time element is
12 involved or how much that would delay the preordering
13 process, if it, in fact, does?

14 A Well, it really doesn't delay. It is built into
15 that process for those identified, and it is spelled out
16 in the guide. Typically, a service inquiry takes five to
17 seven days, typically. It could be, you know, quicker
18 than that, but on average it probably falls within that
19 category range based on the intervals in the guide itself.

20 Q Is there a charge that BellSouth charges to an
21 ALEC for processing a request for a facilities check in a
22 preordering process?

23 A This is a yes/no answer, and you would really
24 need to get to our calls witness, Ms. Caldwell, to get
25 specifics. But for certain products it is built into the

1 overall nonrecurring charge itself. For others, though --
2 specifically what is on my mind now is loop makeup. There
3 is a charge associated with loop makeup information.

4 MS. CHRISTENSEN: Thank you. Staff has no
5 further questions.

6 COMMISSIONER JACOBS: Commissioners.

7 Redirect.

8 REDIRECT EXAMINATION

9 BY MR. GOGGIN:

10 Q Good morning, Mr. Pate. I just have a few
11 questions. At the very beginning of the day, Mr. O'Roark
12 was asking you about the ASR process. Do you recall that
13 discussion?

14 A Yes.

15 Q Today when WorldCom submits an access service
16 request for what -- when it desires a DS-1 loop transport
17 combination, what is actually being ordered by WorldCom on
18 the ASR?

19 A Well, as I stated in some of my earlier
20 discussions here today and tried to make it clear in my
21 testimony that was filed with this Commission, they are
22 actually ordering that special access under the access
23 tariff.

24 Q So today the ASR that they submit does not
25 contain an order for an unbundled DS-1 loop and an order.

1 for an unbundled DS-1 transport?

2 A Definitely it does not.

3 Q Mr. O'Roark also asked you about the manner in
4 which complex retail orders are submitted for purposes of
5 BellSouth's own retail operations. Is the BellSouth
6 representative who enters the complex retail order into
7 the ROS system the same BellSouth person who deals
8 directly with the customer?

9 A No. No, typically not. Almost always not.
10 When you deal with a complex order, this is an order that
11 has been developed as a result, usually, of the overall
12 account team. And that has been developing -- they are
13 the ones that are really working with the end user
14 customer. And they are getting information. They have a
15 system designer on that team just like we have system
16 designers dedicated to the account teams to the ALECs.
17 And that systems designer, along with another person,
18 typically a services consultant, they sit down and develop
19 all of that information. They typically fill out a paper
20 order that is then given to the representative that goes
21 and inputs that from paper into the system, the ROS
22 system, for transmittal of that order.

23 Q Is this submission of a manual paper order to a
24 representative who then inputs it into ROS substantially
25 the same process that is made available to ALECs for

1 complex orders?

2 A Yes. It's what I was describing -- trying to,
3 at least, describe earlier. Because for the ALEC
4 community they are submitting that manual order using an
5 LSR, which they have to fill it out. And they are
6 transmitting it to us via facsimile, that we then turn
7 around and enter. So there in that situation a
8 representative is working from the paper order written up
9 by the ALEC, just as, you know, in correlation to our
10 retail, a rep is working from the paperwork that has been
11 developed by the retail account team.

12 Q Mr. O'Roark also asked you about providing loop
13 qualification information to BellSouth's service
14 representatives. And I think your answer really addressed
15 the manner in which BellSouth plans to make loop
16 qualification information available to ALECs. Is the
17 program being beta tested today for access for loop
18 qualification data being developed for ALECs or for
19 BellSouth's retail service representatives?

20 A If it is for ALECs, that is what my answer was
21 intended for. Because if Mr. O'Roark was asking me for
22 BellSouth retail, I just did not hear his question
23 correctly, and I apologize. But what I described and
24 discussed was specifically for the ALEC community. There
25 is not anything being developed for loop makeup.

1 information to the BellSouth retail representatives.

2 Q Mr. O'Roark also asked you about the
3 availability of electronic ordering for customized
4 routing. Is this an issue that Mr. Milner perhaps could
5 address better?

6 A I think so, yes.

7 Q Mr. O'Roark also asked you about the
8 availability of facilities check information, and in
9 particular about whether this would affect the loop
10 cutover process. Does the availability of facilities have
11 anything to do with the loop cutover process?

12 A No. If you are talking about a loop cutover
13 process, that means you are in the middle of provisioning,
14 so the facilities are in place. You are cutting them
15 over. So the availability would not be an issue. You
16 already have them there. Now you are in the process of
17 cutting those facilities over.

18 Q I believe Mr. O'Roark also asked you about
19 whether the -- if you want to say the unavailability of
20 loop facilities or facilities check information would
21 affect ALECs differently than it would affect BellSouth.
22 Assume, for example, a new BellSouth customer who orders
23 service and subsequently it is determined that the
24 facilities are not available. How would that affect this
25 new BellSouth customer?

1 A The same way. If it is discovered they are not
2 available, we can't provide the service to them, so it
3 would have definitely impact.

4 MR. GOGGIN: I have no further questions.

5 COMMISSIONER JACOBS: Exhibits?

6 MR. GOGGIN: Yes, Commissioner Jacobs, BellSouth
7 moves the admission of Exhibit Number 31, the composite
8 exhibit containing the four exhibits attached to
9 Mr. Pate's direct testimony.

10 COMMISSIONER JACOBS: Okay. Show it admitted.

11 (Exhibit 31 admitted into the record.)

12 MR. O'ROARK: And WorldCom moves the admission
13 of Exhibit 32, which is the August 28th, 2000 letter from
14 BellSouth to WorldCom.

15 COMMISSIONER JACOBS: Okay. Show that admitted.

16 (Exhibit Number 32 admitted into the record.)

17 COMMISSIONER JACOBS: Thank you. You are
18 excused, Mr. Pate.

19 A moment ago when you referred to Mr. Pate's
20 deposition, you indicated -- I'm sorry. It may have been
21 you, Mr. O'Roark -- indicated that there were exhibits
22 attached to his exhibit -- I'm sorry, to his transcript of
23 his deposition.

24 MR. O'ROARK: Yes, Commissioner Jacobs, and
25 those are part of Exhibit 5.

1 COMMISSIONER JACOBS: Okay. Because I hadn't
2 understood that there were exhibits attached. Are there
3 other exhibits to any of the other deposition transcripts
4 that we --

5 MR. O'ROARK: Yes, Commissioner Jacobs, there
6 are.

7 COMMISSIONER JACOBS: Okay. Well, why don't we
8 just note that all of them are composite and that will
9 take of them, and make sure everything that is attached is
10 included in those exhibits.

11 MR. O'ROARK: That would be fine.

12 (Transcript continues in Volume 8.)

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1 STATE OF FLORIDA)

2 : CERTIFICATE OF REPORTER

3 COUNTY OF LEON)

4

5 I, JANE FAUROT, RPR, Chief, FPSC Bureau of Reporting,
6 Official Commission Reporter, do hereby certify that the
7 Hearing in Docket No. 000649-TP was heard by the Florida
8 Public Service Commission at the time and place herein
9 stated.

7

8 It is further certified that I stenographically
9 reported the said proceedings; that the same has been
10 transcribed under my direct supervision; and that this
11 transcript, consisting of 130 pages, Volume 7 constitutes
12 a true transcription of my notes of said proceedings and
13 the and the insertion of the prescribed prefiled testimony
14 of the witnesses.

11

12 I FURTHER CERTIFY that I am not a relative, employee,
13 attorney or counsel of any of the parties, nor am I a
14 relative or employee of any of the parties' attorney or
15 counsel connected with the action, nor am I financially
16 interested in the action.

14

15 DATED THIS 20TH DAY OF OCTOBER, 2000.

15

16



17

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