

E. EARL EDENFIELD, JR.
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

ORIGINAL

January 10, 2001

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RECORDS AND
REPORTING

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **000075-TP (Section 251)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of David Scollard, Elizabeth Shiroishi and Dr. William Taylor which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

E. Earl Edenfield, Jr.

E. Earl Edenfield, Jr. (paw)

APP _____ Enclosures
CAF _____

CMP _____
COM 3/10/01 cc: All Parties of Record
CTR _____ Marshall M. Criser III
ECR _____ R. Douglas Lackey
LEG I _____ Nancy B. White
OPC _____
PAI _____
RGO _____
SEC _____
SER _____
OTH _____

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Marshall M. Criser III *Taylor*
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CERTIFICATE OF SERVICE
Docket No. 000075-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 10th day of January, 2001 to the following:

Diana Caldwell
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael A. Gross
Florida Cable Telecommunications
Assoc., Inc.
310 N. Monroe Street
Tallahassee, FL 32301
Tel.: (850) 681-1990
Fax: (850) 681-9676

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, FL 32302-0551
Tel.: (850) 681-6788
Fax: (850) 681-6515
Represents US LEC
Represents Level 3
Represents Allegiance

Elizabeth Howland, Esq.
Attn: Regulatory & Interconnection
Allegiance Telecom, Inc.
1950 Stemmons Freeway
Suite 3026
Dallas, TX 75207

Morton Posner, Esq.
Regulatory Counsel
Allegiance Telecom
1150 Connecticut Avenue, N.W.
Suite 205
Washington, DC 20036

Charles J. Rehwinkel
Susan Masterton
Sprint-Florida, Inc.
Post Office Box 2214
MS: FLTLHO0107
Tallahassee, FL 32316-2214

Peter M. Dunbar
Karen M. Camechis
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box (32302)
215 South Monroe Street, 2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Pete@penningtonlawfirm.com
Karen@penningtonlawfirm.com

Mark Buechele
Legal Counsel
Supra Telecom
1311 Executive Center Drive
Suite 200
Tallahassee, FL 32301
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522

Wanda Montano
US LEC of Florida, Inc.
401 North Tyron Street
Charlotte, North Carolina 28202
Tel. No. (704) 319-1074
Fax. No. (704) 310-0069

Charles J. Pellegrini
WIGGINS & VILLACORTA, P.A.
2145 Delta Boulevard
Suite 200
Post Office Drawer 1657
Tallahassee, FL 32302
Tel. No. (850) 358-6007
Fax. No. (850) 358-6008
Represents Focal

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359

James C. Falvey, Esq.
e.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Donna Canzano McNulty
MCI WorldCom, Inc.
325 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
Tel. No.: (770) 284-5493
Fax. No.: (770) 284-5488

Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Scott A. Sapperstein
Senior Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923

Marsha Rule
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364

Jon C. Moyle, Esq.
Cathy M. Sellers, Esq.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, Florida 32301

Mr. Herb Bornack
Orlando Telephone Company
4558 S.W. 35th Street
Suite 100
Orlando, FL 32811

Robert Scheffel Wright
Landers & Parsons, P.A.
310 West College Avenue (32301)
Post Office Box 271
Tallahassee, FL 32302
Tel. No. (904) 681-0311
Fax. No. (904) 224-5595
Represents Cox Communications

Jill N. Butler
Vice President of Regulatory Affairs
Cox Communications
4585 Village Avenue
Norfolk, VA 23502

Paul Rubey
Focal Communications Corporation
200 North LaSalle Street
Suite 1100
Chicago, Illinois 60601-1914
Tel. No. (312) 895-8491
Fax. No. (312) 895-8403
prebey@focal.com

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin
Davidson Decker Kaufman, et al.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Represents KMC & FCCA
Represents XO Communications

John McLaughlin
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, Georgia 30043
Tel. No. (678) 985-6262
Fax. No. (678) 985-6213

Charles A. Hudak, Esq.
Ronald V. Jackson, Esq.
Gerry, Friend & Saprnov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, Georgia 30346-2131
Tel. No. (770) 399-9500
Fax. No. (770) 395-0000
BroadBand Office Comm. Inc.

Michael R. Romano, Esq.
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield, CO 80021
Tel. No. (720) 888-7015
Fax. No. (720) 888-5134

Dana Shaffer
Vice President
XO Communications, Inc.
105 Molly Street, Suite 300
Nashville, Tennessee 37201-2315
Tel. No. (615) 777-7700
Fax. No. (615) 345-1564


E. Earl Edenfield, Jr.

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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF DAVID P. SCOLLARD
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000075-TP
JANUARY 10, 2001

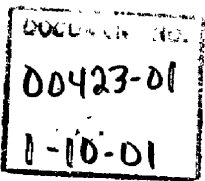
Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. I am David P. Scollard, Room 26D3, 600 N. 19th St., Birmingham, AL 35203.
My current position is Manager, Wholesale Billing at BellSouth Billing, Inc., a
wholly owned subsidiary of BellSouth Telecommunications, Inc. In that role, I
am responsible for overseeing the implementation of various changes to
BellSouth's Customer Records Information System ("CRIS") and Carrier
Access Billing System ("CABS").

Q. ARE YOU THE SAME DAVID SCOLLARD WHO FILED DIRECT
TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING
FILED TODAY?



1 A. The purpose of my testimony is to rebut testimony filed in this docket by Mr.
2 Michael Hunsucker, witness for Sprint Corporation (“Sprint”), and Mr. Lee
3 Selwyn, witness for AT&T Communications of the Southern States, Inc
4 (“AT&T”), TCG of South Florida (“TCG”), Time Warner of Telecom of
5 Florida, LP (“Time Warner”), Allegiance Telecom of Florida, Inc.
6 (“Allegiance”), Florida Cable Telecommunications Association, Inc (“FCTA”),
7 and the Florida Competitive Carriers Association (“FCCA”).

8

9 *Issue 8: Should ISP-bound traffic be separated from non-ISP bound traffic for the*
10 *purposes of assessing any reciprocal compensation payments? If so, how?*

11

12 Q. IN HIS TESTIMONY (AT PAGE 20) SPRINT WITNESS MR.
13 HUNSUCKER STATES THAT A PROCESS OF SEPARATING ISP-
14 BOUND TRAFFIC FROM OTHER TRAFFIC USING A MECHANISM BY
15 WHICH THE LEC SERVING THE ISP REPORTS THE NUMBERS USED
16 BY THE ISP IS NOT WORKABLE. DO YOU AGREE WITH THIS
17 ASSERTION?

18

19 A. No, not at all. There are several examples in the industry today where LECs
20 report line level information and make that information accessible to other
21 local service providers. The database supporting third number and calling card
22 calling is an example that has been in place for decades. Local service
23 providers update the database with telephone numbers authorized to be billed
24 for such calls. As calls are placed, the toll carrier accesses the database and
25 verifies that the call can be completed and billed. In another example, the

1 establishment of processes to support Local Number Portability (LNP)
2 provides for LECs serving a given ported number to report that number for
3 inclusion in the regional LNP database. This process is an extremely important
4 part of the overall LNP service. With the information stored in the database
5 each LEC can then determine who is providing local service to the end user
6 since the telephone number no longer provides enough information to make
7 that determination. More recently, the Ordering and Billing Forum (OBF), the
8 group consisting of ILECS, ALECs, IXCs and other participants responsible
9 for developing solutions to billing issues in the telecommunications industry,
10 has completed the requirements for a database which will house telephone
11 numbers of end users being provided local service via an unbundled switch
12 port. This information is needed by ILECs, ALECs and interexchange
13 companies so that each will know who is to be billing whom for reciprocal
14 compensation and access charges. A similar database (or possibly this same
15 exact database) could be used to identify telephone numbers serving ISPs.
16 Similar to how the process will work for UNE ports, a LEC would input the
17 telephone numbers of the ISPs it serves. As with the UNE port database, other
18 LECs can access the ISP numbers in the database and, using its own switch
19 recordings, verify the amount of traffic that has been treated as ISP traffic on
20 incoming invoices. Since the beginning of local competition there has been an
21 ever-increasing need for each carrier to provide information about the
22 customers it serves. The addition of a process for ISP numbers would be just,
23 another example of that need.

24
25

1 Q. IF A DATABASE OF ISP NUMBERS, ACCESSIBLE TO THE INDUSTRY
2 WERE CREATED, HOW WOULD THESE NUMBERS BE IDENTIFIED?

3

4 A. Since the ISPs themselves are in the sole position to know how a particular
5 service is being used, information would need to be passed from the ISP to the
6 LEC at the time the service was ordered (and subsequently updated as changes
7 occur) so that the LEC could then populate the number into the database.

8

9 Q. ON PAGE 20 OF HIS TESTIMONY MR. HUNSUCKER RAISES A
10 CONCERN ABOUT PROPRIETARY RESTRICTIONS THAT WOULD
11 PRECLUDE THE ESTABLISHMENT OF THE DATABASE YOU
12 DESCRIBED ABOVE. WHAT IS YOUR REPLY?

13

14 A. First, the database described above would not contain any end user information
15 at all. There would be no customer name or address or any other identifying
16 information maintained in the database. Second, as is the case with the LNP
17 database and the newly developed UNE line-level database, the industry
18 participants could be required to agree to use the stored information only for
19 the intended purpose. That is, those carriers with access to the data must only
20 use it for the purpose of creating and verifying intercarrier bills.

21

22 Q. WOULD A PROCESS SIMILAR TO THE LNP AND UNBUNDLED
23 SWITCHING SOLUTION MEET THE CRITERIA SET FORTH ON PAGE
24 48 OF MR. SELWYN'S TESTIMONY?

25

1 A. Yes it would. In fact, these are the very same types of requirements that were
2 discussed at the Ordering and Billing Forum and other industry bodies when
3 these solutions were created. The concept of using a database for the billing of
4 ISP traffic is almost identical to the use of a database for the unbundled switch
5 ports. That is, carriers billing each other have to know something about what
6 type of service is being provided to the customers using a given telephone
7 number. A database method would be verifiable since both the billing and
8 billed carriers would have access to the same information. The solution would
9 be repeatable since the data used to classify the calls as ISP would be
10 controlled in a central database and therefore any query to that database would
11 provide the same result regardless of which provider (billed carrier or billing
12 carrier) was looking for the data. In addition, with the ISPs themselves
13 identifying for the serving LEC those facilities being used to provide ISP
14 service, the concerns of having false negatives or false positives would be
15 minimized. This is precisely the type of solution that was developed to support
16 intercarrier billing for unbundled switch ports and could readily be used for ISP
17 traffic.

18

19 Q. WHAT PROCESS WOULD BE USED WHILE THIS SOLUTION WAS
20 BEING DEVELOPED?

21

22 A. A solution that mirrors what BellSouth is already doing would be a good
23 interim process. Each LEC would maintain its own database of the ISP
24 numbers it serves. The LEC would then identify its own ISP traffic, input it to
25 the billing systems to accurately bill the other carriers. Lacking any data from

1 the billing carrier as to the ISP numbers they serve, the billed carrier would
2 estimate the amount of ISP traffic that is included on the invoice and remit
3 payments accordingly after the invoices have been verified. One change that
4 would be needed from what BellSouth has in place today is the requirement
5 that the ISP would report those numbers which are being used to provide ISP
6 service. Today, BellSouth makes its best efforts to find those numbers from
7 sources independent of the ISP.

8 .

9 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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11 A. Yes.

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