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Legal Department

NANCY B. WHITE  
General Counsel-Florida

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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

RECORDS AND  
REPORTING

February 23, 2001

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

**Re: Docket No. 001097-TP  
Complaint of BellSouth against Supra**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony and Exhibits of Claude P. Morton and Patrick C. Finlen, which we ask that you file in the above-referenced matter.

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,

*Nancy B. White*  
Nancy B. White (fw)

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

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*[Signature]*  
FPSC BUREAU OF RECORDS

*Morton*  
DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

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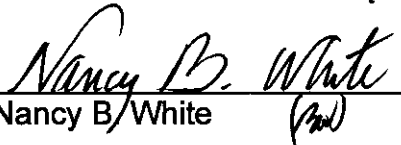
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 001097-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U. S. Mail this 23rd day of February 2001 to the following:

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

Brian Chaiken  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, Florida 33133  
Tel. No. (305) 443-3710  
Fax. No. (305) 443-9516

  
\_\_\_\_\_  
Nancy B. White (ps)

1                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                   DIRECT TESTIMONY OF CLAUDE P. MORTON  
3                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4                   DOCKET NO. 001097-TP  
5                   FEBRUARY 23, 2001

6  
7  
8 Q.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND  
9        POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.  
10       (HEREINAFTER REFERRED TO AS "BELLSOUTH" OR "THE  
11        COMPANY").

12  
13 A.    My name is Claude P. Morton. I am employed by BellSouth as a  
14        Senior Staff Manager in the Interconnection Billing and Collections  
15        Department. My business address is 3535 Colonnade Parkway,  
16        Birmingham, Alabama 35243.

17  
18 Q.    PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

19  
20 A.    I currently have responsibilities of supervising the line and staff groups  
21        ("line" employees interact with customers; "staff" employees support  
22        "line" employees) which handle accounts receivable management,  
23        including collections and billing disputes, for all of the Company's  
24        interconnection business.

25

1 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND  
2 CAREER EXPERIENCE.

3

4 A. I received a Bachelor of Arts degree in English from Brescia University  
5 in Owensboro, Kentucky in 1969. I received a Master of Arts degree in  
6 English from Western Illinois University in 1970. I received a Master of  
7 Business Administration degree from the Amos B. Tuck School at  
8 Dartmouth College in Hanover, New Hampshire in 1987. I began  
9 employment at BellSouth in June, 1973, and have held various  
10 positions in Consumer Operations, Marketing, and International  
11 Operations before assuming my current responsibilities in  
12 Interconnection Billing and Collections.

13

14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15

16 A. The purpose of my testimony is to address BellSouth's position on the  
17 billing disputes Supra has raised under the 1997 BellSouth/Supra  
18 interconnection and resale agreements. Specifically, I will address the  
19 following issues:

20

21 • The Supra account make-up,

22

23 • How accounts are established,

24

25

1           • How BellSouth knows under which account to provide  
2           service, and

3

4           • Types of services Supra ordered under these accounts.

5

6 **Issue 1: Should the rates and charges contained (or not contained) in**  
7 **the 1997 AT&T/BellSouth Agreement apply to the BellSouth bills at**  
8 **issue in this Docket?**

9

10 Q.   HOW MANY ACCOUNTS COMPRISE THE SUPRA ACCOUNT?

11

12 A.   Supra currently has six accounts with BellSouth. Three of these are  
13 resale accounts that were established in July, 1997. The three other  
14 accounts are UNE accounts that were not established until February,  
15 2000.

16

17 Q.   HOW ARE ACCOUNTS ESTABLISHED?

18

19 A.   Requests for account establishment come to BellSouth from the  
20 customer, usually through the salesperson. In order to establish an  
21 account, a customer must provide certain information to BellSouth.  
22 The required documentation includes proof of PSC certification, a  
23 blanket letter of authorization, operating company number (OCN),  
24 CLEC contact number form, contract, Carrier Identification Code, credit  
25 rating and an account application. BellSouth does not establish an

1 account unless there is prior approval from the Credit Group – a  
2 function of the Interconnection Finance organization. There is a  
3 standard process for handling requests for new accounts.

4

5 The account application is completed by the customer, and the  
6 customer identifies the states in which he wishes to do business. A  
7 separate account must be established for each state and for each type  
8 of operation – reseller or facilities based carrier (UNEs). Copies of the  
9 two applications BellSouth received from Supra are attached as Exhibit  
10 CPM-1. Each account is identified by a Billing Telephone Number  
11 (BTN) assigned by BellSouth.

12

13 Q. HOW DOES BELLSOUTH KNOW UNDER WHICH ACCOUNT TO  
14 PROVIDE SERVICE?

15

16 A. The customer provides BellSouth the appropriate account or BTN  
17 (either a resale or UNE account) to which to bill the service being  
18 added. In most instances, the CLEC has an option to place their own  
19 orders into BellSouth's systems through an electronic interface or to  
20 submit their request on paper. A copy of the billing portion of an order  
21 submitted electronically by Supra is attached as Exhibit CPM-2. As can  
22 be seen in this Exhibit, Supra provided the Billing Telephone Number  
23 (BTN) to which the service is to be added. The specific BTN in this  
24 exhibit is associated with a resale account.

25

1 Q. WHAT TYPE OF SERVICES DID SUPRA ORDER UNDER THESE  
2 ACCOUNTS?

3

4 A. Under the resale accounts established in July, 1997, Supra solely  
5 ordered resale services. These resale services included services such  
6 as residential and business lines, Call Waiting, Caller ID, 3-Way  
7 Calling, Memory Call® service, Call Block, and Call Forwarding.

8

9 Under the three accounts established in February, 2000, Supra began  
10 ordering Unbundled Network Elements (UNEs) in March, 2000. Supra  
11 ordered UNES such as Unbundled Exchange Ports, Unbundled Loop  
12 Voice Grade, Memory Call® service, Call Forwarding, Hunting Rollover  
13 Service, 3-way calling, Call Waiting, Call Return, Caller ID.

14

15 Supra did not order UNEs until March, 2000. Supra has ordered and  
16 continues to order resale services under their resale account that was  
17 established in July, 1997.

18

19 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

20

21

22 A. Yes.

23

24

25

26

# BELLSOUTH MASTER ACCOUNT APPLICATION

COMPETITIVE LOCAL EXCHANGE COMPANY

Date 07/07/97

### ACCOUNT INFORMATION

Reseller     Facilities Based Carrier    Tax Exempt \_\_\_\_\_ Tax Code \_\_\_\_\_ State FL.

Certificate of Authority Attached     Yes     No    Estimated Average Monthly Bill \_\_\_\_\_

Company Name/Operating Company Number SUPRA TELECOMMUNICATIONS & INFO. SYSTEMS (7011)  
Local Address 269 GILMIDA AVENUE, SUITE 203  
City CALA CABLES    State FL.    ZIP 33134

Corporate Address 269 GILMIDA AVE, SUITE 203  
City CALA CABLES    State FL.    ZIP 33134

Billing Address 269 GILMIDA AVE, SUITE 203  
City CALA CABLES    State FL.    ZIP 33134

Contact Name & Telephone # for:  
Billing MAY AMOS    Telephone # (305) 443-3710 x 220  
Orders JOSITA    Telephone # (305) 443-3710 x 240  
Other A.J. GONZALEZ    Telephone # (305) 443-3710 x 230

### CREDIT INFORMATION

Previous BellSouth Service    Telephone # (305) 234-5392    Last Date of Service 1/1/97 STILL IN  
 Yes     No    Telephone # (305) 234-5864    Last Date of Service 1/1/97 SERVICE

Other Current BellSouth Service Telephone # (305) 443-3710  
 Yes     No    Telephone # (305) 443-1078

### Ownership

Individual     Partnership  
Name \_\_\_\_\_ Tel # (\_\_\_\_) \_\_\_\_\_ SSN \_\_\_\_\_  
Name \_\_\_\_\_ Tel # (\_\_\_\_) \_\_\_\_\_ SSN \_\_\_\_\_  
Name \_\_\_\_\_ Tel # (\_\_\_\_) \_\_\_\_\_ SSN \_\_\_\_\_  
Name \_\_\_\_\_ Tel # (\_\_\_\_) \_\_\_\_\_ SSN \_\_\_\_\_

Corporation  
President O. A. Ramos    Tel # (305) 443-3710    SSN \_\_\_\_\_  
Vice-President Z. Ramos    Tel # (305) 740-8123    SSN \_\_\_\_\_  
Secretary A. Olasorewa    Tel # (305) 669-4472    SSN \_\_\_\_\_  
Treasurer \_\_\_\_\_    Tel # (\_\_\_\_) \_\_\_\_\_    SSN \_\_\_\_\_

Have you been informed concerning BellSouth's Line Information DataBase (LIDB) contract?     Yes     No

Have you signed a LIDB contract?     Yes     No

Note: Checking "NO" indicates that the CLEC is aware of the consequences of declining, i.e., that BellSouth can not guarantee processing or restriction of LIDB handled calls.



# BELLSOUTH MASTER ACCOUNT APPLICATION

COMPETITIVE LOCAL EXCHANGE COMPANY

Date 02/24/00

## ACCOUNT INFORMATION

Reseller  Facilities Based Carrier Tax Exempt YES Tax Code CS-0468554 FLORIDA

Certificate of Authority Attached  Yes  No Estimated Average Monthly Bill \_\_\_\_\_

Company Name/Operating Company Number SUPRA TELECOM

Local Address 2620 SW 27 AVENUE

City MIAMI State FL ZIP 33133

Company Address SAME AS ABOVE

City \_\_\_\_\_ State FL ZIP \_\_\_\_\_

Billing Address SAME AS ABOVE

City \_\_\_\_\_ State FL ZIP \_\_\_\_\_

Contact Name & Telephone # See

Billing VICTOR MIRIKI Telephone # (305) 476-4250

Orders VICTOR MIRIKI Telephone # (305) 476-4250

Other DAVE NELSON Telephone # (305) 476-4202

## CREDIT INFORMATION

Previous Bellsouth Service Telephone # ( ) \_\_\_\_\_ Last Date of Service 1/1/  
 Yes  No Telephone # ( ) \_\_\_\_\_ Last Date of Service 1/1/

Other Current Bellsouth Service Telephone # (305) 6822-670  
 Yes  No Telephone # (561) 6322-670  
904 9822 670

Ownership  Individual  Partnership  
Name \_\_\_\_\_ Title ( ) \_\_\_\_\_ SSN \_\_\_\_\_

Name \_\_\_\_\_ Title ( ) \_\_\_\_\_ SSN \_\_\_\_\_

Name \_\_\_\_\_ Title ( ) \_\_\_\_\_ SSN \_\_\_\_\_

Name \_\_\_\_\_ Title ( ) \_\_\_\_\_ SSN \_\_\_\_\_

Corporation  
President KAMUS OLUKAYODE Title (305) 476-4220 SSN \_\_\_\_\_

Vice-President BENTLEY CAROL Title (305) 476-4284 SSN \_\_\_\_\_

Secretary OLASHERE ABDUL Title (305) 476-4260 SSN \_\_\_\_\_

Treasurer EMMANUEL DANSO Title (305) 476-4204 SSN \_\_\_\_\_

Have you been informed concerning Bellsouth's Line Information Database (LIDB) contract?  Yes  No

Have you signed a LIDB contract?  Yes  No

Note: Checking "NO" indicates that the CLEC is aware of the consequences of declining, i.e., that Bellsouth can not guarantee processing or restriction of LIDB handled calls.

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