

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

BELLSOUTH TELECOMMUNICATIONS, INC.  
DIRECT TESTIMONY OF RONALD M. PATE  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. TP-001305-TP  
FEBRUARY 26, 2001

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 since that time.

1 Q. HAVE YOU TESTIFIED PREVIOUSLY?

2

3 A. Yes. I have testified on behalf of BellSouth before the Public Service  
4 Commissions ("PSC") in Alabama, Florida, Georgia, Louisiana, South  
5 Carolina, and Kentucky, as well as the Tennessee Regulatory Authority  
6 and the North Carolina Utilities Commission.

7

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9

10 A. The purpose of my testimony is to provide BellSouth's position on Issue  
11 Nos. 5, 6, 38, 39, 46, 47, 51, 55, 57, 60, 61, and 62 raised by Supra  
12 Telecommunications & Information Systems, Inc. ("Supra") in Petition for  
13 Arbitration filed with the Florida Public service Commission  
14 ("Commission") on October 16, 2000.

15

16

17 ***Issue 5: Should BellSouth be required to provide to Supra a download of***  
18 ***all BellSouth's Customer Service Records ("CSRs")?***

19

20 Q. WHAT IS YOUR UNDERSTANDING OF THE NATURE OF THE  
21 DISPUTE CONCERNING ISSUE 5?

22

23 A. My understanding of Supra's position is Supra wants a download of CSRs  
24 for those areas in which Supra markets its services. Supra believes that  
25 such a download is not a violation of the Customer Proprietary Network

1 Information ("CPNI") requirements of the Act, and claims that a download  
2 is necessary to allow Supra to place orders in a timely manner.

3

4 Q. WHAT IS BELLSOUTH'S RESPONSE TO SUPRA'S REQUEST FOR A  
5 DOWNLOAD OF ALL BELLSOUTH CUSTOMER SERVICE RECORDS?

6

7 A. Supra is entitled to view customer service records only for those records  
8 where the end-user customer has given specific permission to do so.  
9 Thus, BellSouth is unwilling to provide a download of the BellSouth  
10 customer service records. Providing Supra with a download of all CSR's,  
11 without authorization of each and every BellSouth customer would  
12 constitute a breach of confidentiality and privacy for which Supra is not  
13 entitled.

14

15 Q. DOES BELLSOUTH PROVIDE SUPRA ACCESS TO BELLSOUTH'S  
16 CUSTOMER SERVICE RECORDS?

17

18 A. Yes. BellSouth provides both electronic and manual access to BellSouth's  
19 Customer Service Records as a pre-ordering functionality and thus, a  
20 download of the CSRs is not necessary. The electronic pre-ordering  
21 functionality, available via the Local Exchange Navigation System  
22 ("LENS"), Telecommunications Access Gateway ("TAG"), and  
23 RoboTAG™ is real-time access to BellSouth's Customer Service Records.  
24 The ability to view Customer Service Record information for the ALEC's  
25 own customers and existing BellSouth customers is described for ALEC's

1 in BellSouth's Pre-Ordering and Ordering Overview Guide available at  
2 BellSouth's Web-Site:

3 <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>  
4

5 Q. WHAT MUST AN ALEC DO IN ORDER TO GAIN ACCESS TO  
6 BELLSOUTH CUSTOMER SERVICE RECORDS?

7

8 A. After contract negotiations between BellSouth and an ALEC are  
9 completed, an ALEC must go through a series of steps that outlines the  
10 requirements for doing business with BellSouth. For the sake of simplicity,  
11 I will not review each step that an ALEC must perform, but specifically  
12 address the provision for securing customer service records.

13

14 First, an ALEC must sign a blanket letter of authorization.

15

16 Q. WHAT IS THE PURPOSE OF A BLANKET LETTER OF  
17 AUTHORIZATION?

18

19 A. The purpose of the blanket letter of authorization is to ensure that an end-  
20 user customer's records are protected from unauthorized access. It  
21 describes the terms and conditions under which an ALEC can obtain  
22 customer service records. Further, it ensures that an ALEC only obtains  
23 the customer service records information necessary to provide  
24 telecommunications services for that end-user customer.

25

1 An end-user's customer service record information contains confidential  
2 and proprietary information and as such must be protected. BellSouth is  
3 committed to providing our customers with the necessary safeguards to  
4 protect their private and confidential information.

5

6 The terms and conditions of the blanket letter of authorization, states that  
7 an ALEC will obtain permission from the end-user customer before  
8 accessing that end-user customer's service records. Additionally, the  
9 ALEC must obtain an individual letter of authorization from the end-user  
10 before accessing the end-user's records. This step is normally executed  
11 at the time an ALEC gains agreement from the prospective end-user  
12 customer for providing that end-user customer's telecommunication  
13 service. During this exchange, the end-user customer signs the  
14 individual letter of authorization granting permission to an ALEC to view  
15 their customer service records.

16

17 Q. ONCE THE BLANKET LETTER OF AUTHORIZATION HAS BEEN  
18 SIGNED, WHAT MUST SUPRA DO TO OBTAIN CUSTOMER SERVICE  
19 RECORDS?

20

21 A. As I stated earlier, BellSouth provides both electronic and manual access  
22 to BellSouth's customer service records. For the sake of simplicity, I will  
23 describe the manner in which a Supra customer service representative,  
24 utilizing the LENS interface, would obtain access to customer service  
25 records.

1 After successfully logging into LENS, a Supra customer service  
2 representative is taken to the main menu screen. The main menu screen  
3 provides several options for selection. The selection options include firm  
4 orders, bulk orders, supplemental existing request, inquiry, view local  
5 service request ("LSR")/order information, and user administration. As  
6 mentioned, for the sake of simplicity, I will address just the steps that a  
7 Supra customer service representative would use to access a customer  
8 service record.

9  
10 Next, the Supra customer service representative selects "Inquiry Mode".  
11 From the "Inquiry Menu", the Supra customer service representative is  
12 prompted to select "View Customer Record". The Supra representative  
13 must also populate the telephone number of the end-user customer along  
14 with the area where the customer resides. Once the telephone number  
15 and associated information has been populated, the Supra representative  
16 selects the "Proceed With Inquiry" prompt. This selection takes the Supra  
17 representative to the customer service record authorization screen. At this  
18 point, the Supra customer service representative will be prompted to  
19 answer the following question, "Are you authorized to view this CSR?" "If  
20 so, click OK." After affirming that the Supra customer service  
21 representative is authorized, BellSouth provides the individual customer  
22 service record. Please see an example of the customer service record  
23 information provided via LENS in Exhibit RMP-1 pages 37 and 38 of the  
24 LENS User Guide 8.0 issued November 14, 2000. You may review the

1 LENS User Guide in its entirety at BellSouth's Interconnection Web Site  
2 at: [http://www.interconnection.bellsouth.com/guides/lens\\_tafi.html](http://www.interconnection.bellsouth.com/guides/lens_tafi.html)

3

4 Further, if the Supra representative does not affirm they are authorized to  
5 obtain the end-user customer's record, BellSouth denies access.

6

7 Q. DOES BELLSOUTH REQUIRE ALECS TO SUBMIT AN INDIVIDUAL  
8 LETTER OF AUTHORIZATION BEFORE ACCESSING CUSTOMER  
9 SERVICE RECORDS?

10

11 A. No. While BellSouth does not require an ALEC to submit a written  
12 authorization from each end-user customer to BellSouth before the ALEC  
13 accesses that end-user's customer service record, BellSouth does require  
14 the ALEC to obtain a signed letter of authorization from the end-user  
15 granting the ALEC authorization to access their customer information.

16

17 Q. HAS BELLSOUTH PROVIDED A DOWNLOAD OF THE CUSTOMER  
18 SERVICE RECORDS TO ANY OTHER ALEC?

19

20 A. No.

21

22

23 ***Issue 38: Should BellSouth provide Supra Telecom true electronic access***  
24 ***to its pre-ordering and ordering interfaces?***

25

1 Q. WHAT IS YOUR UNDERSTANDING OF SUPRA'S POSITION ON THIS  
2 ISSUE?

3

4 A. Supra is seeking direct access to BellSouth databases, which BellSouth  
5 uses for the purposes of provisioning service requests.

6

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

8

9 A. Direct access to BellSouth's databases is unnecessary and more  
10 importantly is not required by the Telecommunications Act of 1996.  
11 BellSouth is required by the Telecommunications Act to provide non-  
12 discriminatory access to its Operations Support Systems ("OSS") for the  
13 purposes of providing access to the functionality of pre-ordering, ordering,  
14 provisioning, maintenance and repair, and billing.

15

16 Q. SHOULD BELLSOUTH BE REQUIRED TO PROVIDE ALEC DIRECT  
17 ELECTRONIC ACCESS TO ITS DATABASES?

18

19 A. Absolutely not. BellSouth is required to provide Supra as well as other  
20 ALECs, with non-discriminatory access to its OSS for pre-ordering,  
21 ordering, provisioning, maintenance and repair, and billing functionalities.

22

23 Q. DID THE FCC DEFINE NON-DISCRIMINATORY ACCESS TO  
24 OPERATIONS SUPPORT SYSTEMS?

25



1 A. Yes. An Incumbent Local Exchange Carrier ("ILEC") such as BellSouth  
2 must provide access to OSS that allows ALECs to perform the functions of  
3 pre-ordering, ordering, provisioning, maintenance and repair, and billing  
4 for resale services in substantially the same time and manner as  
5 BellSouth does for itself; and, in the case of unbundled network elements,  
6 provide a reasonable competitor with a meaningful opportunity to  
7 compete.<sup>1</sup>

8

9 Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

10

11 A. Yes. The FCC reiterated its requirement that a Bell Operating Company  
12 ("BOC") must offer access to competing carriers that is analogous to OSS  
13 functions that a BOC provides to itself. Access to OSS functions must be  
14 offered in "substantially the same time and manner" as the BOC obtains  
15 access. For those OSS functions that have no retail analogue, a BOC  
16 must offer access sufficient to allow an efficient competitor a meaningful  
17 opportunity to compete.<sup>2</sup>

18

19 Q. DOES BELL SOUTH PROVIDE ALECS NON-DISCRIMINATORY  
20 ACCESS TO ITS OSS?

21

---

<sup>1</sup> Federal Communication Commission First Report and Order in CC Docket No. 96-98 and 95-185 released on April 8, 1996 at 312 and 518, hereinafter "First Report and Order".

<sup>2</sup> Application of BellSouth Corporation, et al. for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rcd. 20599 (1998) at 87, hereinafter "FCC Louisiana II Order".

1 A. Yes. BellSouth provides non-discriminatory access to its OSS for ALECs  
2 via electronic and manual interfaces. BellSouth provides access to its  
3 OSS via the following electronic interfaces: Electronic Data Interchange  
4 ("EDI") for ordering and provisioning; Local Exchange Navigation System  
5 ("LENS"), Telecommunications Access Gateway ("TAG"), and  
6 RoboTAG™ for pre-ordering, ordering and provisioning; Trouble Analysis  
7 and Facilities Interface ("TAFI") for maintenance and repair; Electronic  
8 Communications Trouble Administration ("ECTA") for maintenance and  
9 repair; and for the function of billing, Access Daily Usage File ("ADUF"),  
10 Enhanced Optional Daily Usage File ("EODUF") and Optional Daily Usage  
11 File ("ODUF"). In conformance with the FCC's requirements, these  
12 interfaces allow the ALECs to perform the functions of pre-ordering,  
13 ordering, provisioning, maintenance and repair, and billing for services in  
14 substantially the same time and manner as BellSouth does for itself; and,  
15 in the case of unbundled network elements, provide a reasonable  
16 competitor with a meaningful opportunity to compete which is also in  
17 conformance with the FCC's requirements. BellSouth is not obligated to  
18 provide ALECs with any additional access to its OSS functions.

19  
20  
21 ***Issue 39: Should BellSouth provide Supra Telecom access to EDI***  
22 ***interfaces which have already been created as a result of BellSouth***  
23 ***working with other ALECs?***

24  
25

1 Q. WHAT IS YOUR UNDERSTANDING OF SUPRA'S POSITION  
2 REGARDING THIS ISSUE?

3  
4 A. It is not clear to me the nature of Supra's dispute. Supra contends that  
5 they should be allowed to test and use the EDI interfaces which have  
6 been created as a result of BellSouth working with other ALECs.

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

9  
10 A. Currently, BellSouth does not offer a premise based graphical user  
11 interface ("GUI") for EDI. ALECs are responsible for the development  
12 and implementation of the EDI interface. Therefore, BellSouth cannot  
13 make available to Supra an interface that does not exist. For this reason,  
14 once again, it is unclear as to the nature of Supra's dispute.

15  
16 Q. PLEASE DESCRIBE THE EDI INTERFACE.

17  
18 A. Electronic Data Interchange ("EDI") provides ALECs with access to the  
19 same ordering and provisioning OSS accessed by BellSouth's retail  
20 marketing and sales support systems. It is a machine-to-machine  
21 electronic interface which follows the industry standard protocol (EDI) for  
22 ordering and the industry standard Ordering and Billing Forum ("OBF")<sup>3</sup>  
23 guidelines for Local Service Requests ("LSRs"). The EDI ordering  
24 interface has been available to ALECs since December, 1996.

---

<sup>3</sup> OBF is a subcommittee of the Alliance for Telecommunications Solutions ("ATIS"), which is the primary body addressing industry standards and guidelines for the telecommunications industry.

1 Q. IF SUPRA WANTS TO USE EDI FOR SUBMITTING LOCAL SERVICE  
2 REQUESTS TO BELLSOUTH, WHAT MUST SUPRA DO?

3

4 A. Once Supra has developed or purchased and implemented an EDI  
5 graphical user interface, Supra must initiate a request with their BellSouth  
6 Account Team for EDI systems testing. The EDI testing process must be  
7 performed prior to submitting Local Service Requests for the provisioning  
8 of products or services.

9

10 Q. IS THERE A DISPUTE CONCERNING SUPRA'S USE OF EDI?

11

12 A. No.

13

14 Q. HAS BELLSOUTH EVER PROVIDED AN EDI INTERFACE?

15

16 A. No. However, in the past, BellSouth did endorse a vendor provided EDI  
17 system developed by Harbinger, a Value Added Network provider, through  
18 its TrustedLink™ Commerce software package. This product was called  
19 EDI-PC. EDI-PC was discontinued in the fourth quarter of 1999 as it could  
20 not be expanded to handle the business rules of the newer EDI versions.  
21 Consequently, Harbinger notified BellSouth that it would no longer support  
22 further development work for the TrustedLink Commerce EDI-PC  
23 package. This was announced to the ALECs via a Change Control  
24 meeting held first quarter 1999, as well as, via a carrier notification letter.  
25 A copy of that letter is provided as Exhibit RMP- 2.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Q. IN ADDITION TO EDI, DOES BELLSOUTH OFFER ALECS ANOTHER MACHINE-TO-MACHINE ELECTRONIC INTERFACE?

A. Yes. BellSouth provides ALECs with a machine-to-machine industry standard Telecommunications Access Gateway ("TAG") pre-ordering and ordering interface. The TAG pre-ordering and ordering interfaces provide access to the same pre-ordering and ordering OSS functions accessed by the BellSouth retail systems. TAG is based on Common Object Request Broker Architecture ("CORBA"), which is the industry standard for pre-ordering. The TAG pre-ordering interface has been available since August 31, 1998. The TAG ordering interface has been available since November 1, 1998. TAG follows the industry standard Ordering and Billing Forum ("OBF") guidelines for Local Service Requests ("LSRs"). TAG pre-ordering is integratable with EDI ordering.

Q. HAS SUPRA DEVELOPED A TAG INTERFACE?

A. Yes. Supra has recently completed TAG testing with BellSouth and may begin submitting LSRs via TAG as of February 2001.

***Issue 46: Should Supra Telecom be allowed the ability to submit orders electronically for all services and elements?***

1 Q. WHAT IS BELL SOUTH'S UNDERSTANDING OF SUPRA'S POSITION  
2 ON THIS ISSUE?

3

4 A. As BellSouth understands Supra's position, Supra is asking that BellSouth  
5 provide it the ability to submit "all" LSRs electronically.

6

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

8

9 A. BellSouth's position is that non-discriminatory access does not require that  
10 all LSRs be submitted electronically and involve no manual processes.  
11 BellSouth's own retail processes often involve manual processes, as I will  
12 describe below, and therefore there is no requirement that every LSR be  
13 submitted electronically in order to provide non-discriminatory access.

14

15 Q. CAN YOU ELABORATE ON YOUR EARLIER REMARK THAT NON-  
16 DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE  
17 SUBMITTED ELECTRONICALLY?

18

19 A. Yes. As I stated, non-discriminatory access does not require that all LSRs  
20 be submitted electronically. Many of BellSouth's retail services, primarily  
21 complex services, involve substantial manual handling by BellSouth  
22 account teams for BellSouth's own retail customers. Non-discriminatory  
23 access to certain functions for ALECs legitimately may involve manual  
24 processes for these same functions. Therefore, these processes are in  
25 compliance with the Act and the FCC's rules.

1 Q. PLEASE DESCRIBE HOW BELLSOUTH'S COMPLEX SERVICE  
2 REQUESTS ARE MANUALLY HANDLED FOR BELLSOUTH AND  
3 ALECS.

4  
5 A. There are two types of complex services: "Non-designed" and "Designed."  
6 A "Non-designed" service is a class of service with a Universal Service  
7 Order Code ("USOC") that does not require special provisioning and is  
8 served by one central office or wire center. A "Designed" service involves  
9 special engineering and provisioning.

10  
11 An example of a "Designed" complex service for which retail handling is  
12 not fully mechanized is Multiserv® service. This is a complex service  
13 available to both BellSouth's retail customers and to resellers. In the case  
14 of MultiServ®, the pre-ordering processes are largely manual. These  
15 manual pre-ordering processes are substantially the same for both retail  
16 and ALEC orders. Orders for retail services are handled primarily by the  
17 appropriate business unit for retail services -- BellSouth Business Systems  
18 ("BBS") account teams. Orders for ALEC services are handled by the  
19 appropriate business unit for ALEC services -- ALEC account teams that  
20 are part of Interconnection Services ("ICS"). The ICS account team's  
21 handling of complex services for ALECs is substantially the same as  
22 BBS's account team handling of complex services for BellSouth's retail  
23 customers; they both use substantially the same processes as described  
24 below.

25

1 Attached to my testimony is Exhibit RMP- 3, which depicts the flow of the  
2 process for ordering MultiServ® service by ALECs and Exhibit RMP- 4,  
3 which depicts the flow of the process for ordering MultiServ® by  
4 BellSouth's retail unit. To perform the pre-ordering activity for complex  
5 services, which is known as a "service inquiry", a systems designer on the  
6 appropriate BellSouth Business Services or Interconnection Services  
7 account team fills out an extensive paper form and then provides that form  
8 to a project manager for further manual activities. On approval of either  
9 the retail customer or the ALEC, as appropriate, the paper service inquiry  
10 is re-initiated as a firm order, which also is an extensive paper form with  
11 subsequent manual distribution. In both the retail and the resale cases,  
12 the Firm Order Package is manually handed off to the service center,  
13 where paper service order worksheets are created to assist in initiating  
14 service orders in the ordering system. At that point, orders are typed into  
15 the appropriate order systems, the Regional Ordering System ("ROS") for  
16 the BellSouth Retail order and Direct Order Entry ("DOE") for the ALEC  
17 order. The order entry is handled in substantially the same manner for  
18 both the retail and the resale situations, and thus, does not result in a  
19 different customer "experience" in either case. The person who enters the  
20 complex order in BellSouth's systems never has any contact with the end-  
21 user customer, whether the customer belongs to an ALEC or BellSouth.  
22 After the service order is input, the account team and project manager are  
23 notified by e-mail of the service order numbers and due dates. The  
24 account team manually reviews the service order for accuracy and follows  
25 up as necessary. These processes, with their substantial reliance on



1 manual handling and paper forms, are common to both retail and ALEC  
2 orders. Thus, BellSouth provides to ALECs the ability to order complex  
3 services in substantially the same time and manner as it provides to its  
4 retail customers.

5

6 Q. DOES BELLSOUTH PROVIDE ELECTRONIC ORDERING CAPABILITY  
7 TO ALECS FOR LOCAL SERVICE REQUESTS?

8

9 A. Yes. BellSouth provides robust and reliable electronic interfaces LENS,  
10 TAG, RoboTAG™, and EDI to ALECs. These electronic interfaces are  
11 used by ALECs to submit approximately 88% of all LSRs to BellSouth.

12

13 Q. DOES BELLSOUTH PROVIDE A PROCESS FOR THE MANUAL  
14 SUBMISSION OF LSRS BY ALECS?

15

16 A. Yes. BellSouth has established the Local Carrier Service Center ("LCSC")  
17 to serve, as BellSouth's point-of-contact for manually processing LSR's  
18 from ALECs. Manually submitted LSRs are submitted to the LCSC in  
19 accordance with the ordering business rules defined in the BellSouth  
20 Business Rules for Local Ordering TCIF 9/LSOG 4 found on BellSouth's  
21 Web Site:

22 <http://www.interconnection.bellsouth.com/guides/html/leo.html>

23

24 Q. CAN BELLSOUTH ELECTRONICALLY PROCESS ALL LSRS?

25

1 A. No. Because the same manual processes are in place for both ALEC and  
2 BellSouth retail orders, the processes are non-discriminatory and  
3 competitively neutral.

4  
5 Some Unbundled Network Elements (“UNEs”) and complex resold  
6 services require manual handling. The manual processes used by  
7 BellSouth are accomplished in substantially the same time and manner as  
8 the processes used for BellSouth’s complex retail services. The  
9 specialized and complicated nature of complex services, together with the  
10 relatively low volume of orders for them relative to basic exchange  
11 services, renders them less suitable for mechanization, whether for resale  
12 or retail applications. Complex, variable processes are difficult to  
13 mechanize, and BellSouth has concluded that mechanizing many low  
14 volume complex retail services for its own retail operations would be an  
15 imprudent business decision, in that the benefits of mechanization would  
16 not justify the cost.

17  
18

19 ***Issue 47: Should BellSouth be required to allow Supra Telecom the ability***  
20 ***to continue processing orders electronically after the electronic ordering,***  
21 ***without subsequent manual processing by BellSouth personnel?***

22

23 Q. WHAT IS BELL SOUTH'S UNDERSTANDING OF SUPRA'S POSITION  
24 ON THIS ISSUE?

25

1 A. As I understand this issue, Supra is requesting that all complete and  
2 correct LSRs submitted electronically flow through BellSouth systems  
3 without manual intervention.  
4

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

7 A. Non-discriminatory access does not require that all LSRs be submitted  
8 electronically and flow through BellSouth's systems without manual  
9 intervention.  
10

11 Q. WHAT IS FLOW-THROUGH?  
12

13 A. Flow-through for an ALEC LSR occurs when the complete and correct  
14 electronically-submitted LSR is sent via one of the ALEC ordering  
15 interfaces (EDI, TAG, RoboTAG™, or LENS), flows through the  
16 mechanical edit checking and Local Exchange Service Order Generator  
17 ("LESOG") system, is mechanically transformed into a service order by  
18 LESOG, and is accepted by the Service Order Communications System  
19 ("SOCS") without any human intervention.  
20

21 Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE  
22 SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE  
23 BELLSOUTH SYSTEMS?  
24  
25

1 A. No. As I discussed earlier in my testimony, many of BellSouth's retail  
2 services, primarily complex services, involve substantial manual handling  
3 by BellSouth account teams for BellSouth's own retail customers. The  
4 orders at issue here are those that the ALEC may submit electronically,  
5 but fall out by design. In most cases, these orders are complex orders.  
6 For certain orders, BellSouth has, for the ease of the ALEC, allowed them  
7 to be submitted electronically even though such orders are then manually  
8 processed by BellSouth. The specialized and complicated nature of  
9 complex services, together with their relatively low volume of orders as  
10 compared to basic exchange services, renders them less suitable for  
11 mechanization, whether for retail or resale applications. Complex,  
12 variable processes are difficult to mechanize, and BellSouth has  
13 concluded that mechanizing many lower-volume complex retail services  
14 would be imprudent for its own retail operations, in that the benefits of  
15 mechanization would not justify the cost. Because the same manual  
16 processes are in place for both ALEC and BellSouth retail orders, the  
17 processes are competitively neutral, which is exactly what both the Act  
18 and the FCC require.

19

20 Q. WHAT ARE THE REASONS THAT ELECTRONICALLY SUBMITTED  
21 ORDERS FALL OUT FOR MANUAL HANDLING?

22

23 A. There are two main reasons that electronically submitted orders fall out for  
24 manual handling. The first reason is that the Local Exchange Service  
25 Order Generator ("LESOG") has not been programmed to handle requests

1 for certain types of products and services, typically complex services.  
2 Another example might be the inability to justify the economics of  
3 programming for some types of low ordering volume products and  
4 services, e.g. a "T" activity type, which is an outside move of an end user  
5 location.

6  
7 The second reason for fallout concerns unique circumstances related to  
8 the LSR. Requests with pricing plans specific to the ALEC, requests  
9 which have other related requests being processed, and subsequent  
10 requests on an account prior to the new telephone number being posted  
11 to the billing system are all examples of LSRs that are subject to fallout  
12 due to unique circumstances.

13  
14 Q. DOES THE FCC REQUIRE THAT ALL LSRS BE SUBMITTED  
15 ELECTRONICALLY WITHOUT MANUAL INTERVENTION?

16  
17 A. No. Non-discriminatory access does not require that all LSRs be  
18 submitted electronically, and, further, the FCC does not require that all  
19 electronically submitted LSRs have to flow through without manual  
20 intervention. In its approval of in-region interLATA services for both  
21 Southwestern Bell Telephone Company for Texas (paragraph 180) and  
22 Bell Atlantic for New York (footnote 488), the FCC recognized that some  
23 services could properly be designed to fall out for manual processing.

24  
25

1 **Issue 51: Should BellSouth be allowed to impose a manual charge when it**  
2 **fails to provide an electronic interface?**

3

4 Q. WHAT IS YOUR UNDERSTANDING OF THE NATURE OF THE  
5 DISPUTE CONCERNING ISSUE 51?

6

7 A. Supra's position is that BellSouth should not be allowed to impose a  
8 manual ordering charge where BellSouth does not provide an electronic  
9 means for ordering the product or service.

10

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

12

13 A. Certain resale and unbundled network element ("UNE") services must be  
14 submitted manually and BellSouth is entitled to recover its OSS costs by  
15 imposing a manual ordering charge.

16

17 Q. PLEASE EXPLAIN WHEN BELLSOUTH APPLIES THE ELECTRONIC  
18 AND THE MANUAL ORDERING CHARGE.

19

20 A. BellSouth charges the electronic charge for LSRs that are submitted over  
21 any of BellSouth's electronic interfaces. BellSouth applies the manual  
22 ordering charge for LSRs submitted manually to BellSouth's Local Carrier  
23 Service Center ("LCSC") via e-mail, facsimile, U.S. Mail, or similar  
24 method.

25

1 Q. WILL SUPRA PAY ELECTRONIC ORDERING CHARGES FOR  
2 CERTAIN MANUALLY SUBMITTED ORDERS?

3

4 A. Yes. BellSouth has agreed to charge ALECs electronic ordering charges  
5 for complete and accurate LSRs that ALECs must submit manually when  
6 BellSouth's existing electronic interfaces utilized by ALECs are  
7 unavailable for reasons other than scheduled maintenance, provided the  
8 down time does not occur outside the scheduled maintenance window or  
9 for other reasonable scheduled activities for which reasonable advance  
10 notification is provided by BellSouth, and provided the activities do not  
11 occur outside the scheduled window. However, Supra should not be  
12 permitted to avoid manual charges in a wholesale fashion as Supra seeks  
13 to do.

14

15

16 ***Issue 55: Should BellSouth be required to provide an application-to-***  
17 ***application access service order inquiry process?***

18

19 Q. WHAT DO YOU UNDERSTAND SUPRA IS REQUESTING REGARDING  
20 ISSUE 55?

21

22 A. My understanding is that Supra is requesting BellSouth to develop an  
23 application-to-application electronic interface to process service inquiries  
24 (pre-ordering) for its access service requirements. Supra indicates that

1 pre-order information on Unbundled Network Elements (“UNEs”) is  
2 required electronically via this process.

3

4 Q. DOES SUPRA NEED A NEW INTERFACE FOR ACCESS SERVICE  
5 ORDER INQUIRIES IN ORDER TO OBTAIN PRE-ORDERING  
6 INFORMATION ELECTRONICALLY FOR UNBUNDLED NETWORK  
7 ACCESS ELEMENTS, AS DESCRIBED ON PAGE 24 OF ITS PETITION?

8

9 A. No. Supra's claim is that Supra needs the Access Service Request  
10 (“ASR”) interface to “obtain pre-order information electronically for UNEs  
11 ordered via access service request” is wrong. The national standard for  
12 ordering UNEs is the Local Service Request (“LSR”), not the ASR.  
13 BellSouth provides electronic pre-ordering functionality for UNEs and  
14 resale services via the Local Exchange Navigation System (“LENS”),  
15 RoboTAG™, and Telecommunications Access Gateway (“TAG”)  
16 interfaces. Thus, the electronic pre-ordering functionality that Supra seeks  
17 is available through the LSR process.

18

19

20 ***Issue 6: Should BellSouth be required to provide to Supra a download of***  
21 ***BellSouth's Regional Street Address Guide (“RSAG”) Database?***

22

23 ***Issue 57: Should BellSouth be required to provide downloads of RSAG,***  
24 ***PLATS, P/SIMS, and PIC databases without license agreements and without***  
25 ***charges?***



1 Q. WHAT DO YOU UNDERSTAND THAT SUPRA IS REQUESTING OF  
2 BELLSOUTH IN THE AREA OF RSAG, PLATS, P/SIMS and PIC  
3 DOWNLOADS?  
4

5 A. My understanding is Supra wants BellSouth to provide initial and  
6 subsequent database downloads of the BellSouth Regional Street  
7 Address Guide ("RSAG"), Product/Service Inventory Management  
8 ("P/SIMS"), and Primary Interexchange carrier ("PIC") databases. Further,  
9 Supra wants BellSouth to provide these downloads without charge to  
10 Supra and without a license agreement. I am not clear about Supra's  
11 reference to PLATS. I assume that Supra is referring to BellSouth's plat  
12 records that are stored electronically in BellSouth's eastern states and that  
13 Supra desires a download of these as well.  
14

15 Q. WHAT IS RSAG?  
16

17 A. The RSAG is a mammoth database containing every street address that  
18 exists in BellSouth's Region. The database is utilized by local service  
19 providers, including BellSouth, to perform address validation for the  
20 purpose of ordering local service. BellSouth provides ALECs access to  
21 the RSAG database on a per transaction basis, through the LENS, TAG,  
22 and RoboTAG™ pre-ordering electronic interfaces. Since the RSAG is  
23 updated nightly, this means ALECs have real-time access to this database  
24 and thus, have access to the most current and up-to-date RSAG

1 database. The RSAG database returns information without regard to  
2 whether the request originated from an ALEC or from BellSouth.

3

4 Q. IS A DOWNLOAD OF RSAG NECESSARY FOR AN ALEC TO PROVIDE  
5 LOCAL SERVICE TO ITS END USERS?

6

7 A. Absolutely not. What an ALEC does need is access to the data contained  
8 in the RSAG database to validate information, such as the service address  
9 of an end user, so it can place a local service order.

10

11 Q. SHOULD BELLSOUTH BE REQUIRED TO PROVIDE DOWNLOADS OF  
12 RSAG, WITHOUT CHARGE AND WITHOUT A LICENSE AGREEMENT?

13

14 A. No. BellSouth should not be required to provide a download of RSAG  
15 because Supra already has real-time access to RSAG through BellSouth's  
16 robust electronic interfaces.

17

18 Q WHAT ARE P/SIMS AND PIC?

19

20 A. The Product/Services Inventory Management System ("P/SIMS") is a  
21 BellSouth database containing feature availability information based on  
22 software and hardware capabilities of the central office switches.

23

24 The Preferred Interexchange Carrier ("PIC") database contains carrier  
25 information about long distance carriers who contract with BellSouth to

1 supply long distance access to BellSouth end users.

2

3 Q. WILL BELLSOUTH PROVIDE A DOWNLOAD OF THE P/SIMS AND PIC  
4 DATABASE TO SUPRA WITHOUT A LICENSE AGREEMENT OR  
5 CHARGE?

6

7 A. Yes. BellSouth will, upon request, provide a flat file extraction of the  
8 P/SIMS, which also includes PIC information, for all nine states on a  
9 monthly basis. Supra should submit the request for these downloads via  
10 their BellSouth account team.

11

12 Q. WILL BELLSOUTH PROVIDE A DOWNLOAD OF PLAT INFORMATION  
13 AS REQUESTED BY SUPRA?

14

15 A. If Supra is referring to BellSouth's plat records that are stored  
16 electronically for BellSouth's eastern states which includes Florida, the  
17 answer is no. BellSouth will not provide a download of its plat information,  
18 which contains nearly every detail of BellSouth's outside plant network  
19 (i.e. records for conduits, poles, cables, terminals, etc.). BellSouth  
20 considers this detailed plat information as proprietary.

21

22 Further, BellSouth believes that Supra has no legitimate business reason  
23 for requesting this download. This appears to be one more attempt to  
24 obtain proprietary information to which Supra is not entitled.

25

1 ***Issue 60: When BellSouth rejects or clarifies a Supra Telecom order,***  
2 ***should it be required to identify all errors in the order that would cause it to***  
3 ***be rejected of clarified?***

4

5 Q. WHAT IS YOUR UNDERSTANDING OF SUPRA'S REQUEST TO HAVE  
6 BELLSOUTH IDENTIFY ALL ERRORS IN THE ORDER THAT WOULD  
7 CAUSE IT TO BE REJECTED OR CLARIFIED?

8

9 A. My understanding is that Supra wants all errors on Supra's Local Service  
10 Request to be identified by BellSouth prior to returning that service  
11 request to Supra for correction and resubmission. Supra believes this  
12 would prevent the potential for submitting the service request multiple  
13 times.

14

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

16

17 A. Foremost, BellSouth's position is it is the responsibility of Supra to submit  
18 complete and accurate LSRs such that rejections and/or clarifications are  
19 not necessary. Additionally, the type and severity of certain errors may  
20 prevent some LSRs from being processed further once the error is  
21 discovered by BellSouth's system. Without first correcting the error in  
22 question and then resubmitting for further processing, other errors on the  
23 LSR cannot be identified.

24

1 Q. PLEASE GIVE AN EXAMPLE OF AN ERROR THAT WOULD PREVENT  
2 FURTHER PROCESSING.

3

4 A. An example of this type of error, which is frequently incurred, is an invalid  
5 address. If the address is incorrect, the LSR cannot be processed further  
6 and will be returned to the ALEC. This is so because the address for a  
7 service request is a major determinate as to the services available from  
8 the central office serving switch. As a result, a LSR with an incorrect  
9 address must be returned to the ALEC before additional edit checks are  
10 applied against the LSR for the specific services being requested.

11

12 Q. CAN BELLSOUTH CHANGE ITS SYSTEMS, AS REQUESTED?

13

14 A. Possibly, but only at considerable time and expense. Much work would be  
15 necessary to even evaluate what would be involved in modifying  
16 BellSouth's systems as proposed by Supra. Furthermore, Supra can  
17 avoid the problem entirely by submitting complete and accurate LSRs to  
18 BellSouth.

19

20

21 ***Issue 61: Should BellSouth be allowed to drop an order after ten days (or***  
22 ***any other time period), when the order has been accepted by the front-end***  
23 ***ordering system (such as LENS) but sent back into clarification by***  
24 ***BellSouth? Alternately, if BellSouth drops any order, should it be required***  
25 ***to notify Supra telecom the same day the order has been dropped?***

1 Q. WHAT IS A CLARIFICATION TO A LOCAL SERVICE REQUEST?

2

3 A. A clarification to a Local Service Request involves the return of a LSR to  
4 the ALEC for correction of information provided by the ALEC in the  
5 submission of the LSR. BellSouth will return any LSR to the ALEC when  
6 incomplete, incorrect or conflicting information results in BellSouth's  
7 inability to issue the order(s) as requested on the LSR. When ordering  
8 electronically, errors will be returned to the ALEC electronically.

9

10 A. ONCE BELLSOUTH RETURNS THE LSR TO THE ALEC FOR  
11 CLARIFICATION, WHAT IS THE MAXIMUM INTERVAL THAT THE ALEC  
12 HAS TO RESPOND UNTIL BELLSOUTH CANCELS THAT LSR?

13

14 A. BellSouth Business Rules have established a maximum of ten (10)  
15 business days to respond to the request for clarification by submitting a  
16 supplemental LSR. BellSouth position is that ten (10) business days is  
17 sufficient time for the investigation and clarification of any LSR error.  
18 Ten days is ample time for an efficient ALEC operation to resolve  
19 clarifications returned by BellSouth.

20

21 Orders unresolved beyond ten business days, that are canceled by  
22 BellSouth's system, may be resubmitted as new service request and will  
23 be promptly processed by BellSouth.

24

1 Q. IN THE EVENT THAT SUPRA DOES NOT RESPOND TO A REQUEST  
2 FOR LSR CLARIFICATION, WITHIN TEN (10) BUSINESS DAYS OF  
3 NOTIFICATION, DOES BELLSOUTH PROVIDE ADDITIONAL  
4 NOTIFICATION TO SUPRA PRIOR TO CANCELING THE LSR?

5

6 A. No. BellSouth provides notification to Supra when the need for  
7 clarification is identified. Supra has ten business days to respond and if no  
8 response is not received by the 10<sup>th</sup> business day, the LSR is canceled.  
9 Supra is familiar with the BellSouth Business Rules relating to  
10 clarifications and has every interest in resolving errors as soon as notified  
11 and far sooner than 10 business days.

12

13 Q. SHOULD BELLSOUTH SEND A NOTICE TO ALECS PRIOR TO  
14 CANCELING A SERVICE REQUEST THAT HAS BEEN WAITING  
15 CLARIFICATION MORE THAN 10 BUSINESS DAYS?

16

17 A. No. BellSouth should not be required to notify the ALEC, a second time -  
18 on the 10<sup>th</sup> business day that a clarification is required and that  
19 cancellation will be on the 11<sup>th</sup> business day. The ALEC, who has the  
20 primary responsibility to its end-user, is responsible for the overall ordering  
21 and tracking of the ALECs service requests. BellSouth, having notified the  
22 ALEC of a clarification request, should not be asked to assume "reminder"  
23 duties for the ALEC. Nor should BellSouth be asked to retain aging LSRs  
24 in a "clarification status" beyond 10 business days in its OSS, many of  
25 which may never receive a clarification reply. The ALEC, once it has

1 resolved its reason for delay, can simply issue the LSR as a new service  
2 request and the provisioning time will essentially be the same as having  
3 supplemented the original LSR with correct information.

4

5

6 ***Issue 62: Should BellSouth be required to provide completion notices for***  
7 ***manual orders?***

8

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

10

11 A. While BellSouth cannot provide the same kind of completion notification to  
12 Supra as when the order is submitted electronically, BellSouth does  
13 provide information regarding the status of an order, including completion  
14 of the order, through its CLEC Service Order Tracking System ("CSOTS").

15

16 Q. DOES BELLSOUTH HAVE THE CAPABILITY TO SEND COMPLETION  
17 NOTICES FOR MANUAL ORDERS?

18

19 A. No. BellSouth does not provide completion notices for manual orders for  
20 ALECs or for its own retail service orders.

21

22 Q. HOW WILL SUPRA KNOW WHEN BELLSOUTH HAS SWITCHED OVER  
23 SERVICE FOR A SUPRA CUSTOMER WITHOUT A COMPLETION  
24 NOTICE ON MANUAL ORDERS?

25



1 A. BellSouth provides Supra with the operational tools needed in order that  
2 Supra can determine the current status of its orders on a daily basis,  
3 including if manual orders are completed. This tool is the CSOTS system  
4 and it became available to ALECs in December 1999. The CSOTS  
5 system is designed to provide the ALEC community the capability to view  
6 service orders on-line, determine order status, including completion status  
7 on manual orders, and track service orders. CSOTS interfaces with  
8 BellSouth's Service Order Communications System ("SOCS") and  
9 provides service order information on a real-time basis for manually  
10 submitted and electronically submitted LSRs. CSOTS is available on  
11 BellSouth's Web Site at: <https://clecview.bellsouth.com>

12  
13 CSOTS is a secured site and requires a password for access that ALECs  
14 can obtain by contacting their BellSouth Account Team. The CSOTS User  
15 Guide is also available on BellSouth's Web Site at:  
16 <http://www.interconnection.bellsouth.com/guides/html/lsr.html>

17  
18 CSOTS provides ALEC's access to the same service order information  
19 available to BellSouth's own retail units.

20  
21 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

22  
23 A. In this testimony, I have addressed eleven of the allegations made by  
24 Supra concerning OSS. I have demonstrated that these allegations are  
25 completely without merit and should be dismissed by this Commission.

1 Q. Does this conclude your testimony?

2

3 A. Yes.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

**BellSouth Telecommunications, Inc.**

**FPSC Docket No. TP-001305-TP**

**EXHIBIT RMP-1**

**Transmittal Cover Sheet for Pate EXHIBIT RMP - 1**

This sheet transmits the

*Example of Customer Service Record from*

The LENS User Guide 8.0

Issued November 14, 2000

Which consists of 2 pages

COMMON EQUIP

This section contains equipment which is common in function to the entire account or system and auxiliary items connected with a system or account but not directly related to the main service.

NONKEY LINES/STA

This section contains all pertinent information on Lines and Stations, plus miscellaneous items of equipment which are not associated with a key system.

TRUNKS

This section contains all information associated with each trunk on the account, including all appropriate data (i.e., TLI, OGO, DSNA, etc.)

SLA LISTINGS

This section contains a list of all System Listing Addresses (SLA) and appropriate number for all systems other than system 1 on multi-system accounts.

### 3.7.3 Examples of Customer Records

Below are some examples of Customer Records you may see.

*Example of a Customer Record for a Simple Residence account:*

```
.....  
205 NNN XXXX D15 *CSR*  
  
LN Customer Name  
LA Customer Address  
  , HOOVER  
SA 4699 SANDPIPER LN, BIRMINGHAM  
DZIP 35244  
  
---DIR  
DDA BA  
DEL A1, B1  
  
---BILL  
BN1 Billing Name  
BA2 4699 SANDPIPER LN  
PO BIRMINGHAM AL 35244  
  
---S&E  
  
  (OTHER)  
  
1 NW101 Network interface-Outside+  
  /CSN COV/ZSER 3C10000001  
  
  (LINES & STATIONS)
```

Figure 33 Customer Record for a Simple Residence Account (Top Half)

1 MBRX MemoryCall Answering Ser+  
/TN NNN-XXXX/MBTN NNN-XXXX  
/DLNH 2-LISTED NAME  
/SED 06-21-94/ZSER 4310000002

1 HWV Message Waiting - Stutter+  
/TN NNN-XXXX/SED 06-21-94  
/ZSER 4A10000003

1 ACR Area Calling Service, Res+  
/PIC 0333/PCA CH, 10-28-96  
/NEC/ZSER 5110000004

1 TTR Touch-Tone  
  
/ZSER 5810000005

1 AHB Telecommunications Relay +  
/CSN COV/ZSER 5F10000006

1 ESX Call Waiting  
/ZSER 6610000007

1 GCE Call Forwarding Busy Line  
/SED 06-21-94/ZSER 6D10000008

1 GCJ Call Forwarding Don't Ans+  
/RCYC 3/SED 06-21-94  
/ZSER 7410000009

1 UPPE1 Area calling service-usag+  
/CSN COV/ZSER 7B1000000A

1 9LM FCC Charge for Network Act+  
/ZSER 821000000B

---

(CALLING CARD SERVICE)

1 BSXCC Co-Branded BellSouth Call+  
/CSN COV/ZSER 891000000C  
/SED 01-16-96

205 NNN XXXX 015 \*CSR\*

---COMPLETED ACTIVITY

**Figure 34 Customer Record for a Simple Residence Account (Bottom Half)**

**BellSouth Telecommunications, Inc.**

**FPSC Docket 001305-TP**

**EXHIBIT RMP-2**

**Transmittal Cover Sheet for Pate EXHIBIT RMP - 2**

This sheet transmits the

ALEC Notification Letter

SN91081447

Which consists of 1 page

---

**BellSouth Interconnection Services**

675 West Peachtree Street  
Atlanta, Georgia 30375

**Carrier Notification  
SN91081447**

Date: April 5, 1999

To: Competitive Local Exchange Carriers

Subject: CLEC - Harbinger to Discontinue EDI-PC Updates

Electronic Data Interchange -- Personal Computer (EDI-PC) uses a commercially available PC-based customer interface package that provides a Graphical User Interface (GUI) for the EDI system. It has been provided to EDI customers by Harbinger, a Value Added Network provider, through its TrustedLink™ Commerce software package.

The Harbinger software is Y2K capable and ANSI Standard 4010 compatible. However, it cannot be expanded to handle the business rules for EDI Version #9 or higher. Harbinger has notified BellSouth that it will no longer support further development work for the TrustedLink™ Commerce EDI-PC package. Harbinger will continue to provide support for the existing package. Other software vendors may develop and provide EDI compatible GUIs that support the more recent EDI versions.

The Telecommunications Access Gateway (TAG) system, combined with a front-end GUI, will provide a CLEC with an integrated customer management solution. This GUI may be developed by a CLEC, obtained from a software provider or purchased from BellSouth. This will allow the CLEC to obtain pre-order information and to do up-front editing, both of which will facilitate sending cleaner, more accurate order transactions to BellSouth. TAG also offers more advanced functional enhancements, Y2K compliance and continuous upgrades.

BellSouth is presently working to develop a standardized CLEC GUI for TAG. Further information on the status of this work will be provided as it becomes available.

Sincerely,

**ORIGINAL SIGNED BY JOHN McCAIN FOR JIM BRINKLEY**

Jim Brinkley - Senior Director  
Interconnection Services

**BellSouth Telecommunications, Inc.**

**FPSC Docket 001305-TP**

**EXHIBIT RMP-3**

**Transmittal Cover Sheet for Pate EXHIBIT RMP - 3**

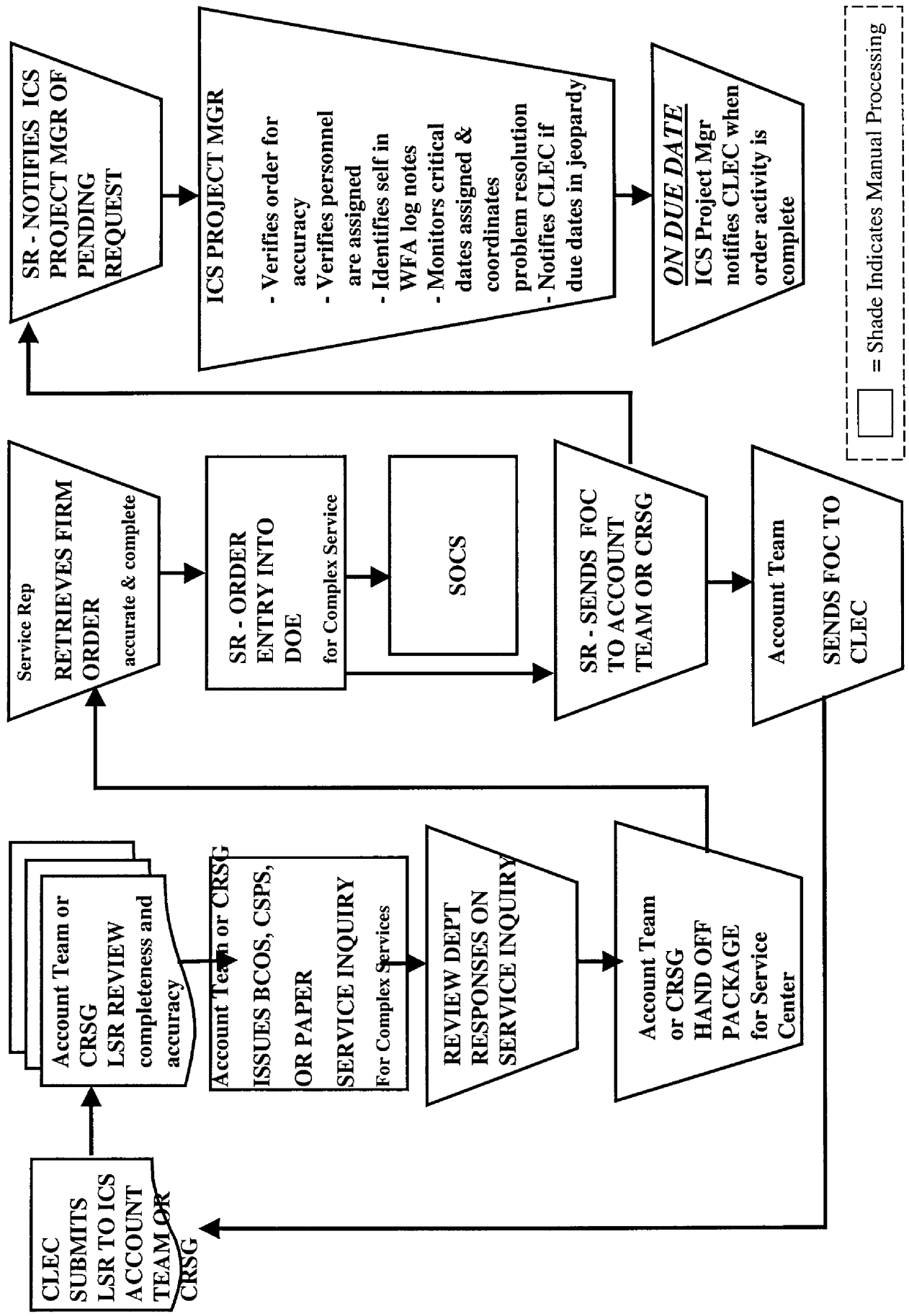
This sheet transmits the

Process Flow for ordering MultiServe® service by ALECs

Which consists of 1 page



# CLEC: Complex Services - MultiServ®



**BellSouth Telecommunications, Inc.**

**FPSC Docket 001305-TP**

**EXHIBIT RMP-4**

**Transmittal Cover Sheet for Pate EXHIBIT RMP - 4**

This sheet transmits the

Process Flow for ordering MultiServ® service by BellSouth's retail unit

Which consists of 1 page

# BST RETAIL: Complex Services - MultiServ®

