1	BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2 3	IDS TELCOM, LLC
4 5	DIRECT TESTIMONY OF WILLIAM P. GULAS
6 7 8 9 10 11 12 13	IN RE: INVESTIGATION INTO THE ESTABLISHMENT OF OPERATIONS SUPPORT SYSTEMS PERMANENT PERFORMANCE MEASURES FOR INCUMBENT LOCAL EXCHANGE TELECOMUNICATIONS COMPANIES. DOCKET NO. 000121-TP
14	Q: PLEASE STATE YOUR FULL NAME AND BUSINESS ADDRESS FOR
15	THE RECORD.
16	A: My name is William P. Gulas, and I am the Vice President of Local Services
17	of IDS Telcom, LLC ("IDS") located at Miami, Florida.
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19	Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
20	AND EXPERIENCE.
21	A: Before recently joining IDS, I worked for 11 years at BellSouth
22	Telecommunications, Inc. ("BellSouth"), most recently as product manager for
23	the company's switched combination services. As product manager for what
24	is known in the industry as the UNE-P product, I designed the product,
25	defined its characteristics complying with legal and regulatory requirements,
26	wrote the marketing plan, guided the product team through its development of
27	the service and educated both senior management and the sales force about
28	the product.

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1	I was also involved in negotiating interconnection agreements with
2	competitive local exchange carriers ("LECs"), including AT&T, WorldCom,
3	and sprint, and I helped the sales force by making presentations to customers
4	about the product and answering their questions.
5	Before becoming a product manager, I worked in the competitive analysis
6	and market research groups in BellSouth and as such I am very familiar with
7	the telecommunications competitive landscape.
8	I hold a Masters Degree in Marketing and an undergraduate degree in
9	Business Administration from the University of Alabama, and a Masters
10	Certificate in Product management from George Washington University.
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12	Q: COULD YOU PLEASE DESCRIBE BRIEFLY THE SCOPE OF YOUR
12 13	Q: COULD YOU PLEASE DESCRIBE BRIEFLY THE SCOPE OF YOUR CURRENT RESPONSIBILITIES AT IDS?
13	CURRENT RESPONSIBILITIES AT IDS?
13 14	CURRENT RESPONSIBILITIES AT IDS? A: I am a Vice President of Local Services with IDS. My duties and functions
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13 14 15 16	CURRENT RESPONSIBILITIES AT IDS? A: I am a Vice President of Local Services with IDS. My duties and functions include responsibility for negotiating and administering interconnection agreements between IDS and incumbent LECs. In particular, I have primary
13 14 15 16 17	CURRENT RESPONSIBILITIES AT IDS? A: I am a Vice President of Local Services with IDS. My duties and functions include responsibility for negotiating and administering interconnection agreements between IDS and incumbent LECs. In particular, I have primary responsibility for conducting negotiations on behalf of IDS with BellSouth for
13 14 15 16 17 18	 CURRENT RESPONSIBILITIES AT IDS? A: I am a Vice President of Local Services with IDS. My duties and functions include responsibility for negotiating and administering interconnection agreements between IDS and incumbent LECs. In particular, I have primary responsibility for conducting negotiations on behalf of IDS with BellSouth for an interconnection agreement pursuant to the Telecommunications Act of
13 14 15 16 17 18 19	 CURRENT RESPONSIBILITIES AT IDS? A: I am a Vice President of Local Services with IDS. My duties and functions include responsibility for negotiating and administering interconnection agreements between IDS and incumbent LECs. In particular, I have primary responsibility for conducting negotiations on behalf of IDS with BellSouth for an interconnection agreement pursuant to the Telecommunications Act of

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A: I am testifying on behalf of IDS Telcom, LLC ("IDS"), an alternative local 1 exchange company ("ALEC") certificated and operating in the State of Florida. 2 As an alternative local exchange company operating in Florida and providing 3 telecommunications services to business customers, IDS must purchase 4 telecommunications services on a resale and unbundled network element 5 (UNE) basis from incumbent local exchange carriers such as BellSouth and 6 Sprint. IDS must provision those resale services and UNEs through use of 7 the incumbent local exchange carriers' operations support systems (OSS). 8 9 Therefore, performance metrics set by the Commission in this proceeding will directly and substantially affect IDS' ability to provide services to Florida 10 consumers. Therefore, IDS has an important and substantial interest in this 11 proceeding. 12

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14 **Q:** Please summarize your testimony.

A: IDS has experienced tremendous difficulties with the OSS provided by 15 16 BellSouth in terms of the provisioning of telecommunications services for resale and the provisioning of UNEs. IDS has had extensive experience in 17 the use of BellSouth's OSS and has found that BellSouth's OSS continues to 18 cripple IDS' operations and to completely hinder any possibility of the 19 20 development of competition in the local exchange services market. Any 21 performance measures adopted by the Commission must be easily 22 understandable, enforceable and verifiable, and must provide for serious ramifications in the event of BellSouth's continued failure to meet its 23

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- obligations regarding the provision of OSS that are at parity with its internal
- 2 OSS.
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- 4 Q: Does this conclude your testimony?
- 5 A: Yes, it does