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April 11, 2001

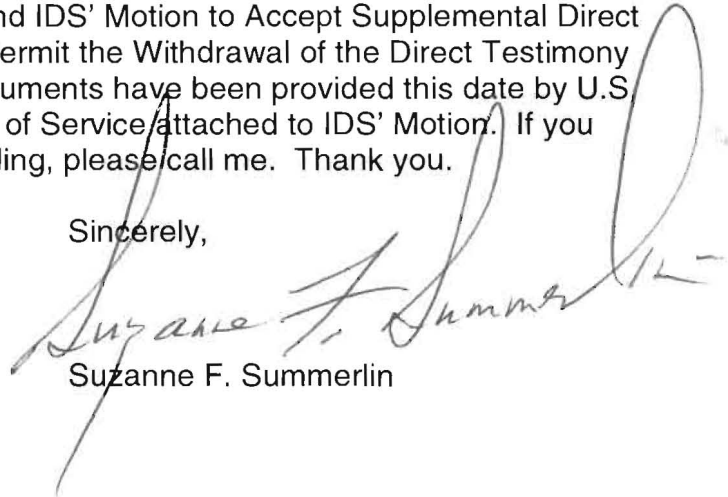
Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, Florida 32399-0850

RE: Docket No. 000121-TP – Investigation into the Establishment of
Operations Support Systems Permanent Performance Measures for
Incumbent Local Exchange Telecommunications Companies.

Dear Ms. Bayo:

Enclosed for filing on behalf of IDS Telcom L.L.C., in Docket No. 000121-TP, are the original and fifteen copies of IDS Telcom L.L.C.'s Supplemental Direct Testimony of Keith Kramer and IDS' Motion to Accept Supplemental Direct Testimony of Keith Kramer and to Permit the Withdrawal of the Direct Testimony of William Gulas. Both of these documents have been provided this date by U.S. Mail to the parties on the Certificate of Service attached to IDS' Motion. If you have any questions regarding this filing, please call me. Thank you.

Sincerely,



Suzanne F. Summerlin

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Testimony
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1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2
3 **IDS TELCOM, LLC**

4
5 **SUPPLEMENTAL DIRECT TESTIMONY OF KEITH KRAMER**

6
7
8 **IN RE: INVESTIGATION INTO THE ESTABLISHMENT OF OPERATIONS**
9 **SUPPORT SYSTEMS PERMANENT PERFORMANCE MEASURES FOR**
10 **INCUMBENT LOCAL EXCHANGE TELECOMMUNICATIONS COMPANIES.**
11 **DOCKET NO. 000121-TP**
12
13

14 **Q: PLEASE STATE YOUR FULL NAME AND BUSINESS ADDRESS FOR**
15 **THE RECORD.**

16 **A:** My name is Keith Kramer, Senior Vice President of IDS Telcom, LLC, located
17 at Miami, Florida.

18
19 **Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND**
20 **AND EXPERIENCE.**

21 **A:** I began my telecommunications career in 1994 as Director of Sales and
22 Marketing at IDS. I have a Bachelors Degree in Business from the University
23 of Miami, a Master's Degree from Florida International University and over 15
24 years experience in retail sales and marketing.

25
26 **Q: COULD YOU PLEASE DESCRIBE BRIEFLY THE SCOPE OF YOUR**
27 **CURRENT RESPONSIBILITIES AT IDS?**

28 **A:** I am responsible for product development and promotion for IDS.

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1 I have developed the sales division and managed the staff, at IDS producing
2 an astounding revenue growth of \$1.2 million to \$40 million per year. More
3 recently, I led the company's UNE-P development along with Operator
4 Services and interface systems between IDS and BellSouth
5 Telecommunications, Inc. ("BellSouth"). I have negotiated the UNE contracts
6 with BellSouth, Bell Atlantic and Southwestern Bell which led to my promotion
7 to the position of Senior Vice President. I am currently responsible for all
8 interconnection agreements, regulatory issues such as tariffs and certification
9 in other states and the network planning for implementing the expansion of
10 IDS.

11
12 **Q: WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT**
13 **TESTIMONY?**

14 **A:** I am testifying on behalf of IDS Telcom, LLC ("IDS"), an alternative local
15 exchange company ("ALEC") certificated and operating in the State of Florida.
16 As an alternative local exchange company operating in Florida and providing
17 telecommunications services to business customers, IDS must purchase
18 telecommunications services on a resale and unbundled network element
19 (UNE) basis from incumbent local exchange carriers such as BellSouth and
20 Sprint. IDS must provision those resale services and UNEs through use of
21 the incumbent local exchange carriers' operations support systems (OSS).
22 Therefore, performance metrics set by the Commission in this proceeding will
23 directly and substantially affect IDS' ability to provide services to Florida

1 consumers. Therefore, IDS has an important and substantial interest in this
2 proceeding.

3 **Q: WHY IS IT NECESSARY FOR YOU TO PROVIDE THIS SUPPLEMENTAL**
4 **DIRECT TESTIMONY?**

5 **A:** I am providing Supplemental Direct Testimony because, at the time of the
6 filing of my original Direct Testimony, I had not had the opportunity to review
7 the Staff's Direct Testimony filed in February 2001, nor had I had the
8 opportunity to draft complete testimony. IDS has not had the opportunity to
9 participate in this ongoing proceeding for the last two years because IDS is a
10 small operation. As a small company, IDS has devoted its limited resources
11 to trying to provide local and long distance services instead of participating in
12 this, although very worthwhile, very expensive proceeding. Another very
13 significant reason for this Supplemental Direct Testimony is that there have
14 been numerous occurrences since the due date for the original direct
15 testimony of March 1, 2001, about which IDS could not have known when
16 filing its direct testimony on March 1, 2001. IDS is a company which has had
17 daily, direct experience with BellSouth's OSS Systems in regard to providing
18 local telecommunications services for the past two years. This type of
19 practical, actual hands-on experience appears to be somewhat unique. I
20 believe that IDS' experience provides a useful perspective to the Commission
21 as regards the types of performance metrics that need to be established by
22 the Commission if any type of competition in the local exchange services
23 market is ever going to develop.

1 **Q: PLEASE SUMMARIZE YOUR TESTIMONY.**

2 **A:** IDS has experienced tremendous difficulties with the OSS provided by
3 BellSouth in terms of the provisioning of telecommunications services for
4 resale and the provisioning of UNEs. IDS has had extensive experience in
5 the use of BellSouth's OSS and has found that BellSouth's OSS continues to
6 cripple IDS' operations and to completely hinder any possibility of the
7 development of competition in the local exchange services market. Any
8 performance measures adopted by the Commission must be easily
9 understandable, enforceable and verifiable, and must provide for serious
10 ramifications in the event of BellSouth's continued failure to meet its
11 obligations regarding the provision of OSS that are at parity with its internal
12 OSS. IDS strongly supports the Staff's proposed general plan as presented
13 by Paul Stallcup's testimony filed in this proceeding. IDS supports Staff's
14 proposal because it contains incentives to compel BellSouth to provide
15 services to ALECs at parity with those provided to BellSouth's customers.
16 These incentives, in the form of monetary payments to ALECs in addition to
17 penalties to be paid to the State of Florida General Revenue Fund, will
18 provide the necessary motivation to BellSouth to bring its OSS Systems to a
19 fully functional level. Up to this point in time, BellSouth's OSS Systems have
20 not functioned properly and BellSouth has not provided service at parity to
21 ALECs. BellSouth has had no significant negative regulatory or legal
22 consequences as a result of its non-compliant service, either in the form of

1 regulatory penalties or money damages. This proceeding has the potential to
2 provide those essential negative regulatory and legal consequences.

3
4 **Q: CAN YOU PROVIDE A BRIEF HISTORY OF IDS' RELATIONSHIP WITH**
5 **BELLSOUTH?**

6 **A:** Yes. On November 11, 1999, IDS entered into an Agreement with BellSouth
7 to sell Port/Loop Combinations with a Professional Service Fee attached.

8 The Agreement was the result of good faith negotiations that started in April
9 1999. The Agreement spelled out two forms of electronic interfaces, EDI and
10 TAG. In August 1999, IDS chose EDI as the electronic interface by which it
11 would convert customers to UNE Port/Loop Combinations. During that
12 month, IDS sent operational personnel to BellSouth for training. After IDS
13 signed the Agreement, IDS attempted to convert its existing "resale" customer
14 base to the UNEs as provided for in the Agreement. IDS had no success in
15 this effort. BellSouth's customer service manager, Patty Knight, informed me
16 that this was a training issue and suggested that BellSouth re-train our
17 operational personnel. IDS agreed and the re-training commenced in
18 December 1999. During the training session, IDS asked the trainers, Patty
19 Knight and Pat Rand, to demonstrate EDI by converting some of our resale
20 customers to UNE-P. Both representatives were unsuccessful in performing
21 Port/Loop conversions through EDI. IDS later concluded that EDI would not
22 be a successful interface for Port/Loop conversions.

1 In January 2000, IDS ordered TAG to replace EDI. BellSouth informed
2 IDS that the installation and testing for TAG could not be performed until late
3 May 2000. IDS responded that this was unacceptable. IDS stated that it
4 would complain to the Florida Public Service Commission if BellSouth did not
5 install TAG sooner than May 2000. IDS also evaluated other OSS systems to
6 interface with TAG, including BellSouth, ROBOTAG, and MANTISS.
7 Although both MANTISS and TAG were operational in March 2000, IDS was
8 still unsuccessful at converting its resale base to UNE-P because BellSouth
9 provided IDS an incorrect USOC. After several weeks, IDS obtained the
10 correct USOC from BellSouth. However, IDS continued to experience
11 difficulties in conversions of its resale customers to UNE-Ps because
12 BellSouth had failed to enter the correct USOC into its billing system. After
13 BellSouth entered the correct USOC, IDS again attempted in mid-April 2000
14 to convert its resale base to UNE-P. At this point, IDS found that BellSouth
15 had frozen IDS' resale base for internal reasons, so IDS could not move its
16 resale base to UNE-P.

17 Nearing the end of April 2000, BellSouth asked IDS to be part of a
18 BETA-test for bulk ordering conversions (See Exhibit A). IDS was still
19 considering this request by BellSouth when, in the first week of May at the
20 BellSouth CLEC forum, it was announced that bulk ordering capabilities were
21 ready. IDS verified that BellSouth's announcement as to the readiness and
22 functionality of its bulk ordering capabilities for UNE-P was reflected on the
23 BellSouth Web site.

1 IDS was BellSouth's first customer to use bulk ordering to convert an
2 entire set of resale customers to UNE-P. When IDS used BellSouth's bulk
3 ordering system, IDS discovered that the system was not functional. This
4 caused a great disruption of services to IDS' customers. BellSouth took 48
5 hours to identify the problem and two weeks to fully correct the problems
6 caused our customers. During this crisis, when IDS' customers were
7 experiencing problems, IDS discovered that BellSouth's retail operation was
8 informing IDS' customers that the problems were created by IDS. The retail
9 operation stated to IDS' customers that, if they would come back to BellSouth,
10 their services would be restored within the hour. IDS reported this to
11 BellSouth's wholesale operation, which responded with a letter to Joe
12 Millstone, CEO of IDS, acknowledging that BellSouth had caused these
13 problems. (See Exhibit B.)

14 After the immediate problems were addressed, BellSouth again asked IDS
15 to BETA-test the bulk ordering system. This BellSouth request absolutely
16 confirmed that BellSouth had previously released an untested system. IDS
17 agreed to BETA-test the bulk ordering system but, during the testing phase,
18 BellSouth denied IDS the option to purchase Port/Loop conversions.

19 Referring to the limitation of liability provision in the Interconnection
20 Agreement between IDS and BellSouth, BellSouth refused to assume any
21 liability for damages incurred by IDS as a direct result of BellSouth's actions.
22 BellSouth's actions constituted gross negligence. To mitigate the damages it
23 caused IDS, BellSouth offered only a partial month's credit of \$31,000 and an

1 apology letter. IDS lost 712 lines for both local and long distance services,
2 which translates into over a million dollars in annualized lost revenue. IDS
3 continues to have serious OSS conversion problems. During the months of
4 August and September 2000, IDS had continuing problems with what is
5 referred to as "D" and "N" orders. In "D" and "N" orders, the customer's
6 service is deactivated and then reactivated as new service. During the
7 months of August and September 2000, due to system upgrades, an
8 overwhelming number of IDS' customers were put out of service because the
9 "D" orders went through, but not the "N" orders.

10 In October 2000, IDS discovered that, if its customer has voice mail,
11 BellSouth disconnects the customer's voice mail during the conversion to
12 IDS. The customer's voice mail requires reprogramming. This is an on-going
13 issue.

14 In November 2000, IDS discovered that BellSouth was completing only
15 55% of the conversions on the "PON" due date. BellSouth was placing the
16 balance of the conversions into a pending status. IDS informed BellSouth of
17 this problem on a number of occasions. (See Exhibit C.) However, the
18 problem increased significantly in December 2000 when several additional
19 issues came to light.

20 BellSouth's LENS system has had systemic problems on a continual ,
21 basis, especially during a system upgrade that was begun in early September
22 2000. At this point, BellSouth was converting less than 50% of IDS'
23 customers on the PON due date. BellSouth was delaying the majority of the

1 conversions for four to five weeks. Frequently, BellSouth's retail operation
2 aggressively worked to win back IDS' customers while the customers'
3 conversions were in a pending status. BellSouth was practically 100%
4 successful in this effort. The data IDS was receiving through LENS was
5 inaccurate. BellSouth was reflecting the conversion date as the PON due
6 date even when the actual conversion was completed days or weeks after the
7 PON due date. BellSouth was manipulating the data on the conversion date
8 by back-dating the conversion date to the PON due date. IDS has raised this
9 issue with BellSouth. (See Exhibit D.)

10 IDS' current OSS problems include: (1) BellSouth's retail operation has
11 inappropriate access to BellSouth's wholesale operation's conversion
12 process. This enables BellSouth's retail operation to win back customers
13 prior to BellSouth's wholesale operation completing the initial conversion of
14 the customers to IDS and reflecting such conversion by updating the
15 Customer Service Record. (2) IDS' customers with voice mail systems suffer
16 outages during the conversion process. (3) IDS' customers are not being
17 converted in a transparent transaction; IDS' customers are being
18 disconnected from their telecommunications services during their conversion
19 to IDS. These customers are suffering outages that they frequently attribute
20 to IDS as a result of BellSouth's retail operation's misrepresentations. (4)
21 BellSouth's wholesale operation takes an extraordinarily long time to
22 provision new services ordered by IDS' customers compared to the time it
23 takes BellSouth's retail operation to provision the same services. Often

1 these customers are told that, if they return to BellSouth, their new services
2 can be provisioned within hours.

3
4 **Q: WHAT ADDITIONAL INCIDENTS RELEVANT TO BELL SOUTH'S OSS**
5 **SYSTEMS AND THE PERFORMANCE METRICS AT ISSUE IN THIS**
6 **PROCEEDING HAVE OCCURRED SINCE THE MARCH 1, 2001,**
7 **DEADLINE FOR DIRECT TESTIMONY?**

8 **A:** Since March 1, 2001, IDS has experienced several incidents related to
9 BellSouth's OSS Systems that suggest the need for the type of performance
10 metrics and enforcement measures laid out in Staff's proposal.

11 During the past several weeks, IDS has learned that fifty-three of its
12 accounts have been contacted by BellSouth's retail division prior to IDS
13 even receiving a Firm Order Confirmation. During these contacts,
14 BellSouth's retail offers inducements to these customers to win them back
15 to BellSouth's service. These types of coincidental actions by BellSouth's
16 retail division strongly suggest that BellSouth's OSS Systems are providing
17 inappropriate sharing of information regarding new ALEC customers
18 between BellSouth wholesale and BellSouth retail permitting BellSouth retail
19 to contact these customers and win them back with inducements prior to
20 even completing the conversions to the ALEC.

21 IDS has also learned in the past few weeks that when IDS submits a
22 "suspend" order to BellSouth, BellSouth has been frequently placing these
23 customers in a "disconnect" mode. When this happens, BellSouth

1 disconnects a customer that owes money to IDS and IDS is then prevented
2 from obtaining payment of those owed monies and BellSouth is permitted to
3 win the customer back from IDS by providing service. If BellSouth properly
4 implemented the "suspend" order, IDS would retain the customer. This
5 would prevent BellSouth from providing service, and thus, IDS could compel
6 payment of the customer's bill since service would be "suspended" until
7 payment. This type of practice by BellSouth continually results in IDS losing
8 additional customers back to BellSouth. Again, without reasonable and
9 clear performance metrics and an effective enforcement mechanism as
10 contained in the Staff's proposal, BellSouth pays no damages or penalties
11 for these types of sub-parity services provided to IDS and other ALECs.

12 As of today's date, IDS has experienced yet another incident that
13 illustrates the fact that, without clear, reasonable performance metrics and
14 an effective enforcement mechanism, BellSouth can continue to provide
15 extremely financially-costly sub-parity service to IDS and other ALECs with
16 impunity. A business customer with 36 lines for whom IDS had recently
17 submitted a conversion "as is" order to BellSouth, called IDS today. This
18 customer stated that a BellSouth technician was at his premises to
19 disconnect his telephone services because IDS had submitted an order to
20 convert his service to IDS. When presented with IDS' statement that this
21 customer's service was to be converted "as is", the BellSouth technician
22 replied that he was "following his orders" by disconnecting the customer's
23 service. This customer's service could be out for hours or days depending

1 on how long BellSouth takes to recognize the mistake it has made in not
2 converting this customer's service "as is." Under the current regime without
3 reasonable performance metrics and a serious enforcement mechanism as
4 Staff has recommended, BellSouth will pay no damages to IDS for this
5 mistake which has occurred consistently and frequently over the past two
6 years. BellSouth will, in fact, charge IDS for its visit to this business
7 customer to disconnect his service.

8
9 **Q: DO YOU HAVE ANY RECOMMENDATIONS FOR THE FLORIDA PUBLIC**
10 **SERVICE COMMISSION REGARDING BELL SOUTH'S OSS?**

11 **A:** Yes. My first recommendation is to adopt the Staff's proposal for
12 performance metrics and an enforcement mechanism as set forth in Witness
13 Paul Stallcup's testimony. In addition, I have a number of other
14 recommendations, as follow below.

15 **No. 1:** IDS is capable of converting over a thousand business lines per day.
16 IDS has, in fact, processed this number of orders on a consistent basis. At
17 present, BellSouth's OSS problems are causing IDS' customers to experience
18 serious conversion problems 30% of the time. IDS has data that
19 demonstrates this fact and is willing to provide such data to the Commission
20 on a daily, weekly, monthly, or quarterly basis.

21 **Recommendation:** The Florida Public Service Commission should
22 require that IDS and other ALECs provide data on a periodic basis to

1 demonstrate exactly what level of performance BellSouth's OSS is achieving
2 at any given time.

3
4 **No. 2:** BellSouth compiles data on conversions which it regularly provides to
5 IDS. BellSouth should be ordered to supply this same data to the
6 Commission for comparison to the data supplied by IDS and other ALECs.

7 **Recommendation:** The Florida Public Service Commission should
8 require that BellSouth provide the Commission, on a periodic basis, the same
9 data it provides to IDS and other ALECs on the percentage of conversions it
10 completes for IDS and other ALECs on an individual basis.

11
12 **No. 3:** BellSouth should not be allowed to manipulate data on conversions in
13 order to reflect better performance. The Commission should use its authority
14 to severely penalize BellSouth where it finds evidence of such manipulation
15 by BellSouth as IDS experienced in November and December 2000.

16 **Recommendation:** The Florida Public Service Commission should
17 provide oversight of the data provided by BellSouth regarding the percentage
18 of conversions completed to assure that the data is not improperly
19 manipulated by BellSouth. In the event of such manipulation, the Florida
20 Public Service Commission should appropriately sanction BellSouth.

21
22 **No. 4:** BellSouth's PMAP measurements need to be revised to accurately
23 reflect conversion performance. (See Exhibit E.) Currently, PMAP shows

1 Firm Order Confirmations (“FOCs”), but not conversions. A “FOC” simply
2 means that BellSouth’s Legacy System has received an order, not that
3 BellSouth has successfully converted the line. (See Exhibit D – This Exhibit
4 appears to reflect that BellSouth successfully completed 98% of the orders it
5 received from IDS, when, in fact, BellSouth successfully completed only 55%
6 of the orders it received from IDS.)

7 **Recommendation:** The Florida Public Service Commission should order
8 BellSouth to revise its PMAP measurements to accurately reflect conversion
9 performance.

10
11 **No. 5:** The OSS systems BellSouth utilizes for its wholesale customers
12 should be identical to those utilized for BellSouth’s retail customers.
13 Currently, BellSouth’s retail operation has the capability to provision a
14 customer’s service within hours while BellSouth’s wholesale operation cannot
15 provision the same service for days or weeks. BellSouth’s retail operation
16 uses the RNS OSS system. The RNS system gives BellSouth’s retail
17 operation an inherent and profound advantage over BellSouth’s wholesale
18 operation. There can be no parity of service for ALECs with BellSouth’s
19 provision of services to its own retail customers while this situation continues.

20 **Recommendation:** The Florida Public Service Commission should order
21 BellSouth to immediately provide IDS and other ALECs with access to the
22 RNS system and any other OSS systems available to BellSouth’s retail
23 operation.

1 **No. 6:** Until BellSouth's wholesale OSS systems can perform conversions,
2 moves, adds, and changes within a 5% standard deviation from what
3 BellSouth's retail RNS and other OSS systems can perform, BellSouth's retail
4 operation should be barred from winning back any customer to BellSouth's
5 service based on OSS problems caused by BellSouth wholesale systems.

6 **Recommendation:** The Florida Public Service Commission should order
7 BellSouth to demonstrate that its wholesale operation can perform
8 conversions, moves, adds, and changes within a 5% standard deviation from
9 what its retail operation provides prior to permitting BellSouth to operate
10 under any tariff that provides win-back provisions.

11
12 **No. 7:** BellSouth's OSS upgrades and new OSS products must be fully
13 BETA- tested and independently certified to function appropriately before
14 BellSouth may offer them to ALECs.

15 **Recommendation:** The Florida Pubic Service Commissions should order
16 BellSouth to cease and desist offering OSS upgrades or new OSS products
17 prior to fully BETA-testing these products and having them independently
18 certified to the Commission as functioning properly.

19
20 **No. 8:** In the event the BellSouth provides upgrades or products for OSS, the
21 Commission should require that the BETA testing protocols and the third
22 party certification to be filed with the Commission prior to the release date.
23 The Commission should then independently notify the ALECs of the upgrades

1 and or new products with the appropriate testing and certification available
2 upon request.

3 **Recommendation:** The Florida Public Service Commission should order
4 BellSouth to provide the BETA testing protocols and third party certification
5 for OSS upgrades or new OSS products to the Commission prior to their
6 release. The Commission should independently notify ALECs of the
7 existence of such OSS upgrades and new OSS products and, upon request,
8 provide copies of the BETA testing protocols and third party certification.

9
10 **No. 9:** BellSouth's wholesale operations' OSS system performance should
11 be required to match that of BellSouth's retail operations' OSS system
12 performance within a time certain. If by that time certain, BellSouth has not
13 demonstrated parity between the wholesale operation's OSS systems and the
14 retail operation's OSS systems, then BellSouth should be ordered to allow
15 ALECs access to the retail OSS systems.

16 **Recommendation:** BellSouth should be ordered to demonstrate parity
17 between its wholesale and retail operations' OSS systems within six months
18 of the Commission's order. If BellSouth does not demonstrate such parity by
19 that date, the Commission should order BellSouth to provide IDS and other
20 ALECs immediate access to BellSouth's retail operation's OSS systems.

21
22 **No. 10:** The Commission should use real data provided by ALECs to
23 determine if BellSouth has complied with the parity requirement.

1 **Recommendation:** The Florida Public Service Commission should
2 require the submission of real data on which to determine if BellSouth has
3 complied with the parity requirement.

4
5 **No. 11:** BellSouth should be ordered to prove that its OSS Systems' do not
6 provide its retail operation access to its wholesale operation's information on
7 ALECs' customers. BellSouth must create a firewall between the two
8 divisions immediately. The effectiveness of this firewall in creating a secure
9 environment for ALECs' customers' data should be certified by an
10 independent third party.

11 **Recommendation:** The Florida Public Service Commission should order
12 BellSouth to prove that it has a structural arrangement that effectively protects
13 ALECs from the sharing of customer information between BellSouth's
14 wholesale and retail operations.

15
16 **No. 12:** The Commission should establish a Code of Conduct to which
17 BellSouth must adhere to protect ALECs from BellSouth's anti-competitive
18 behavior.

19 **Recommendation:** The Florida Public Service Commission should
20 appoint a committee based on representatives from both Tier-1 and Tier-2
21 companies, ALECs, and BellSouth to draft the Code of Conduct and the
22 penalties for non-compliance. The Code of Conduct should be established
23 and approved by the Commission for enforcement prior to January 1, 2002.

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No. 13: Neither party to interconnection agreements should be permitted to limit their liability for negligence, gross negligence, or willful misconduct in regard to OSS issue. As demonstrated in IDS' situation, because of an OSS failure, BellSouth won back a million plus dollars worth of customers. BellSouth "mitigated" IDS' damages with a letter of apology and a credit of \$31,000. As long as limitation of liability provisions exist, it is in BellSouth's best interest to cause ALECs OSS problems to win back customers. There is no down side.

Recommendation: The Florida Public Service Commission should include in its Code of Conduct a requirement that parties bear the damages related to OSS failures for which they are responsible.

No. 14: The conversion data supplied by the ALECs and BellSouth should be sent to an independent third party. This data should show: (1) the number of accounts converted for UNE-Ps; (2) the number of accounts put into clarification by ALECs or by BellSouth; (3) the number of conversion problems categorized as catastrophic (customer put out of service); and (4) any other problems that change the scope of service that was previously provided by BellSouth. This performance data should then be compared to determine if the data supplied by BellSouth is consistent to that supplied by the ALECs. In the event there is a statistical deviation between the sets of

1 data, then either party can request an independent audit with the results then
2 reported to the Commission.

3 **Recommendation:** The Florida Public Service Commission should order
4 that conversion data be sent by ALECs and BellSouth to an independent third
5 party for analysis and comparison.

6

7 **No. 15:** The Commission should create a fund to finance any independent
8 audits of conversion data with contributions coming from ALECs and
9 BellSouth, and the amount of contributions based on the comparative size of
10 the companies.

11 **Recommendation:** The Florida Public Service Commission should
12 create a fund to finance independent audits of conversion data with
13 contributions from ALECs and BellSouth and the amounts of the contributions
14 based on the comparative size of the companies.

15

16 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A: Yes, it does.

18

19

20

21

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23