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RECORDS AND
REPORTING

April 26, 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. 001810-TP (TCG/Teleport Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Clyde Greene and Beth Shiroishi, which we ask that you file in the captioned docket.

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

Sincerely,

E. Earl Edenfield, Jr.

E. Earl Edenfield Jr. (KA)

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

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Shiroishi
DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 001810-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U. S. Mail this 26th day of April, 2001 to the following:

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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF CLYDE L. GREENE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 001810-TP
APRIL 26, 2001

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

A. I am Clyde L. Greene, Room 28A1, 600 N. 19th St., Birmingham, AL 35203.
My current position is Specialist, Wholesale Billing at BellSouth Billing, Inc.,
a wholly owned subsidiary of BellSouth Telecommunications, Inc. In that role,
I am responsible for overseeing the implementation of various changes to
BellSouth's Customer Records Information System ("CRIS") and Carrier
Access Billing System ("CABS").

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from the University of Alabama at Birmingham with a Bachelor of
Science Degree in Electrical Engineering in 1990. I began my career at
BellSouth in July 1990 as an Administrative Assistant within the Network
Department with responsibility for mechanized call testing and call recording
trouble investigation. Since July 1994, I have served in various CABS support
roles within the billing organization. I am familiar with the billing services

1 provided by BellSouth Telecommunications to local competitors,
2 interexchange carriers and retail end user customers.

3

4 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS
5 PROCEEDING?

6

7 The purpose of my testimony is to provide the Commission with an
8 understanding of the work that has been done within BellSouth's Carrier
9 Access Billing System ("CABS") to process usage records for calls originating
10 from an Alternative Local Exchange Carrier ("ALEC") (such as TCG) bound
11 for the internet through Internet Service Providers (ISPs) served by BellSouth.

12

13 Q. WHAT IS CABS?

14

15 A. CABS is a system that BellSouth uses primarily for billing interexchange
16 carriers for services ordered from the FCC and state Access Tariffs. BellSouth
17 also uses CABS to bill ALECs for a number of services such as local
18 interconnection trunking and usage charges, unbundled designed loops and
19 unbundled dedicated interoffice transport. CABS is designed to accept service
20 orders which are initiated from IXCs, ALECs and other customers as they
21 order access, local interconnection and UNE types of services. In addition,
22 CABS processes the massive numbers of call records that are produced in the
23 BellSouth central offices associated with access, local and other types of
24 facilities. For example, when an ALEC sends a call across one of its
25 interconnection trunks, the BellSouth switch to which that trunk interconnects

1 generates a usage record. CABS processes that record and bills the applicable
2 rate elements to the ALEC or other interconnecting carrier based on whether
3 the call is local, intra-LATA toll or inter-LATA.

4

5 Q. DID BELLSOUTH MAKE ANY CHANGES TO CABS TO SEPERATELY
6 METER OR OTHERWISE SPECIFICALLY HANDLE USAGE RECORDS
7 FOR CALLS BOUND FOR ISPs SERVED BY BELLSOUTH?

8

9 A. Yes. As early as January 1997, BellSouth began a project to identify methods
10 to separate ISP traffic from local traffic by identifying specific 10-digit
11 telephone numbers of ISP providers served by BellSouth. Through this process,
12 BellSouth could then identify and separate out ISP traffic that originated on
13 ALEC networks to ensure that such traffic would not be considered when
14 calculating reciprocal compensation bills that BellSouth submitted to ALECs.
15 In June 1997, BellSouth instituted a work request to implement this
16 enhancement in CABS. Although originally targeted for completion by
17 August, 1997, the enhancement was not implemented in CABS until
18 September 1997. In September 1998, CABS was revised again to specifically
19 detail the ISP traffic on the ALEC's bill pages to illustrate that these calls were
20 being zero-rated and to aid the ALECs in bill verification efforts.

21

22

23 Q. WERE ON-GOING PROCESSES DEVELOPED TO MAINTAIN THIS
24 CABS CAPABILITY?

25

1 A. Yes. A process was put in place to maintain the database of telephone numbers
2 identified as being used by an ISP. This process allowed for new numbers to be
3 added and for numbers to be removed as the ISP's use of them ended. These
4 updates were made on a periodic basis as new information became available.

5

6 Q. HAS BELLSOUTH BILLED ALECS RECIPROCAL COMPENSATION
7 FOR ISP TRAFFIC?

8

9 A. No. BellSouth has never intentionally billed reciprocal compensation for ISP
10 traffic to any ALEC. In October 1995, when the billing requirements for ALEC
11 traffic were first being addressed, BellSouth's systems were not equipped to
12 bill ALECs for reciprocal compensation. Thus, BellSouth implemented a
13 process in CABS to create an error record for any call originating from NPA-
14 NXXs being used by ALECs. While these calls were not actually "errors", an
15 error record provided an easy way to hold the usage records associated with the
16 traffic while BellSouth revised CABS to implement the various billing
17 provisions of the ALEC contracts. BellSouth designed the error record process
18 to ensure that ALECs were not billed for any reciprocal compensation
19 whatsoever, including for ISP traffic, while the local contract billing
20 requirements were implemented in the systems. So that BellSouth could
21 ensure it billed ALECs appropriately when BellSouth completed the
22 implementation of the enhancements to CABS to appropriately bill for
23 reciprocal compensation, BellSouth wrote off the usage held beginning in
24 October 1995 rather than billing the ALECs for that reciprocal compensation.

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1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2

3 A. Yes.

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