

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s Entry into)
InterLATA Services Pursuant to Section) Docket No. 960786-TL
271 of the Federal Telecommunications)
Act of 1996.)

REBUTTAL TESTIMONY AND EXHIBIT

OF

MARY H. CAMPBELL

ON BEHALF OF NUVOX COMMUNICATIONS, INC

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1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Mary Haynsworth Campbell and my business address is 301
3 North Main Street, Suite 8000, Greenville SC 29601.

4 **Q: BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A: I am the Tariff Manager for NuVox Communications, Inc. (“NuVox”).

6 **Q: PLEASE DESCRIBE YOUR BACKGROUND AND EXPERIENCE IN**
7 **THE TELECOMMUNICATIONS INDUSTRY.**

8 A: I have a B.S. degree from the College of Charleston in Urban Administration
9 and City Planning. I have been employed in the telecommunications industry
10 for seven years. I have held various regulatory positions with LCI, CTG,
11 Qwest Communications and NuVox.

12 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A: My testimony relates to checklist item 2 – access to unbundled network
14 elements. My testimony rebuts the testimony of BellSouth witness Cox who
15 states that BellSouth performance data associated with commercial usage
16 shows that BellSouth has complied with the Section 271 checklist. My
17 testimony outlines NuVox’s concerns about the integrity of the data that
18 underlie BellSouth’s performance reporting. My testimony describes a fatal
19 flaw in BellSouth’s performance data for NuVox which makes the data
20 unreliable. In short, the BellSouth performance reports do not include data for
21 all of NuVox’s operations, and, thus, the data is incomplete.

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23

1 **BellSouth's PMAP Data Did Not Include All of NuVox's Operations**

2 **Q: WHAT ARE YOUR RESPONSIBILITIES AT NUVOX REGARDING**
3 **BELLSOUTH'S PERFORMANCE DATA?**

4 A: My responsibilities at NuVox include handling special projects for company
5 management. In late May 2001, I was asked to review data posted on
6 BellSouth's Performance Measurement Analysis Platform ("PMAP")
7 regarding BellSouth's performance.

8 **Q: WHEN DID YOU BEGIN LOOKING AT THIS DATA?**

9 On May 25, 2001, I contacted NuVox's BellSouth account representative,
10 Scott Christian to obtain the required user identification and password to
11 access NuVox's data on the PMAP website. I told him the data could be under
12 any of several company names – NuVox, TriVergent, State Communications
13 or Gabriel Communications. (State Communications is the name of NuVox's
14 original predecessor corporation. State Communications later became
15 TriVergent Communications which recently merged with Gabriel
16 Communications.) BellSouth provided me a single user identification and
17 password to access all of NuVox's data.

18 **Q: HOW WAS THE DATA DISPLAYED WHEN YOU LOGGED ON TO**
19 **THE PMAP WEBSITE?**

20 A: On May 31, 2001, I logged on to the website and saw that the reports listed
21 the company name as STATECOMM with the operating company number
22 ("OCN") 8672. OCNs are assigned by National Exchange Company
23 Association and are required by BellSouth to process orders for resold

1 services and for unbundled network elements (“UNEs”) used in combination
2 with NuVox’s own facilities to provide telecommunications services.

3 **Q: DOES NUVOX HAVE MORE THAN ONE OCN?**

4 A: Yes. NuVox has several OCNs. Among them are OCN 8672 assigned for
5 resale orders and OCN 2505 assigned for ordering UNEs and related services
6 for customers served on NuVox’s facilities. When I saw that the PMAP
7 website listed only the name STATECOMM and the 8672 OCN, I was
8 concerned that the PMAP data was not complete.

9 **Q: DID YOU ASK BELLSOUTH WHETHER THE PMAP DATA FOR**
10 **NUVOX WAS COMPLETE?**

11 A: Yes. On or about June 5, 2001, I spoke with Jan Strain, a BellSouth PMAP
12 Administrator, and told her of my concern. She assured me that she had
13 checked all the names Mr. Christian had given her for NuVox. She told me
14 that our company’s data was under the name STATECOMM and that there
15 was no additional data under any of the other company names.

16 **Q: WHAT DID YOUR REVIEW OF THE PMAP DATA REVEAL?**

17 A: After my conversation with Ms. Strain, I reviewed the PMAP data for April
18 and May 2001 and determined that there were large discrepancies between
19 NuVox internal data and the BellSouth PMAP data. For instance, the NuVox
20 internal data reflect that NuVox submitted 616 local service requests to
21 BellSouth throughout the region during the month of April 2001. BellSouth’s
22 count of NuVox local service requests as shown on several PMAP reports was
23 1942 for April.

1 **Q: WHAT STEPS DID YOU TAKE TO VALIDATE THE PMAP DATA?**

2 A: To validate BellSouth's data, I compared purchase order numbers ("PONs")
3 from NuVox's records with BellSouth's raw data files for metric O-7 "%
4 Rejected Service Requests" for April 201. None of the PONs from the
5 NuVox internal report was included on the BellSouth raw data file.

6 **Q: DID YOU DO ANYTHING ELSE?**

7 A: Yes. In a further effort to validate BellSouth's data, I attempted to compare
8 BellSouth's service order flow-through data with NuVox internal data.
9 BellSouth publishes order flow-through data for all Alternative Local
10 Exchange Carriers ("ALECs") but substitutes the ALEC's name with a key
11 number to protect the confidentiality of individual ALECs' data. Therefore, it
12 was necessary for me to obtain the key number assigned by BellSouth to
13 NuVox flow-through data. On June 19, 2001, I requested the flow-through
14 report key for our company from Jan Strain. She forwarded my request to
15 Debbie Gardner of BellSouth. On June 20, 2001, Ms. Gardner forwarded me
16 the key for April data which she identified as TriVergent (OCN 2505). In her
17 e-mail, Ms. Strain stated that TriVergent data "is shown in PMAP as State
18 Comm." See Exhibit MHC-1 to my testimony. However, all of the data on
19 the PMAP website is identified as STATECOM OCN 8672.

20 **Q: WHAT DID YOUR REVIEW OF THE FLOW-THROUGH DATA**
21 **REVEAL?**

22 A. When I reviewed the BellSouth flow-through data for NuVox for April under
23 the key number I discovered that the information was still incomplete and

1 reflected only a fraction of the orders submitted to BellSouth by NuVox for
2 this period. None of the orders for UNEs and related services submitted under
3 OCN 2505 were included.

4 **Q: WHAT DID YOU DO NEXT?**

5 A: On July 5, 2001 I telephoned Scott Christian and informed him of this
6 discrepancy by voice mail. He returned my call the same day and told me that
7 there should be data under OCN 2505 (UNEs) as well as OCN 8672 (resale).
8 However, he told me that BellSouth did not find any PMAP reports with
9 NuVox's OCN for unbundled network elements - 2505. Mr. Christian's
10 statement contradicted what Ms. Strain told me in early June when I first
11 expressed my concern at seeing only the STATECOMM company name on
12 the PMAP website.

13 **Q: WHAT IS THE SIGNIFICANCE OF MR. CHRISTIAN'S**
14 **STATEMENT TO YOU?**

15 A: It is apparent now that the PMAP reports which BellSouth purported to
16 include all of NuVox data, in fact, do not. The PMAP reports include only
17 data on NuVox's resale business. Since January 2001, resale has represented
18 only approximately one third of NuVox's orders to BellSouth. BellSouth's
19 PMAP data for NuVox is incomplete and is an inaccurate reflection of
20 BellSouth's performance. The PMAP data for other ALECs may likewise be
21 incomplete.

22 **Q: HAS BELL SOUTH CORRECTED THIS ERROR?**

23 A: On July 7, 2001, Scott Christian informed me that the PMAP website would

1 be corrected within the week to include data for all NuVox's operations.

2 More data was posted on or about July 9, 2001.

3 **BellSouth's "New" NuVox PMAP Data Is Inaccurate and Incomplete**

4 **Q. IS THE PMAP DATA POSTED AFTER JULY 9TH COMPLETE?**

5 A: No. The PMAP data for May 2001 which BellSouth revised to purportedly
6 include all of NuVox's operations is missing significant amounts of
7 information on NuVox transactions with BellSouth.

8 **Q: HOW DO YOU KNOW?**

9 A: NuVox uses the Electronic Data Interchange ("EDI") interface and
10 BellSouth's Local Exchange Navigation System ("LENS") to submit LSRs to
11 BellSouth. NuVox's electronic systems automatically capture records of
12 LSRs submitted to BellSouth via EDI and responses received electronically
13 from BellSouth, such as notices of fatal rejects. BellSouth defines fatal rejects
14 as ALEC errors that prevent an LSR from being processed further. I
15 compared NuVox's May data for LSRs submitted against two separate
16 BellSouth raw data files. In both instances, BellSouth's numbers substantially
17 understated NuVox's LSR volume for the month. Moreover, the NuVox LSR
18 counts in the two BellSouth reports were different. The BellSouth reports
19 were inconsistent with each other.

20 **Q: HOW FAR OFF WAS BELLSOUTH'S PMAP DATA?**

21 A: For the month of May 2001, NuVox submitted 3180 LSRs to BellSouth
22 through EDI. BellSouth's "Ordering: Service Order Report," accessible via
23 the PMAP website, contains raw data used in BellSouth's reports. The

1 Service Order Report includes the number of LSRs BellSouth attributes to
2 NuVox each month. For May 2001, BellSouth's Service Order Report
3 included only 250 NuVox LSRs submitted via EDI. BellSouth's
4 Miscellaneous Aggregate % Flow-Through Detail report for May reflects a
5 different number of LSRs for NuVox. The number recorded on this report by
6 BellSouth is 254.

7 **Q: DID YOU MAKE ANY OTHER COMPARISONS?**

8 A: Yes. I undertook the same type of comparison for NuVox's May data on fatal
9 rejects. Again, I looked at two separate BellSouth raw data files. Both
10 BellSouth reports understated the NuVox numbers. Again, the two BellSouth
11 files reported inconsistent numbers.

12 **Q: WERE THESE TWO BELLSOUTH REPORTS CONSISTENT?**

13 A: No. NuVox received 271 fatal reject responses in May. BellSouth's
14 "Ordering: Fatal Rejects" raw data file for May 2001 reflects 222 fatal rejects
15 for NuVox. On the other hand, BellSouth's Miscellaneous Aggregate %
16 Flow-Through Detail report for May shows a different total – 111. Both
17 BellSouth reports understate the actual number of fatal rejects, and the two
18 BellSouth reports are inconsistent with each other.

19 **Q: DOES NUVOX CURRENTLY HAVE ANY MEANS TO EVALUATE**
20 **BELLSOUTH'S PERFORMANCE?**

21 A: BellSouth's PMAP data for NuVox is incomplete and inaccurate. BellSouth's
22 PMAP inaccurately reflects BellSouth's performance with respect to NuVox.

23 **Q: SHOULD THE COMMISSION HAVE CONFIDENCE IN**

1 **BELLSOUTH'S PMAP DATA?**

2 A: No. The facts described here suggest that the ALEC aggregate data reported
3 by BellSouth for Florida is incomplete, inaccurate and therefore unreliable.

4 The PMAP data for other ALECs may likewise be incomplete. As a result of
5 this experience, NuVox has no confidence in the PMAP data. Nor should the
6 Commission.

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

8 A: Yes.

From: "Gardner, Deborah L" <Deborah.Gardner@bellsouth.com>
To: "Strain, Jan P." <JanP.Strain@bridge.bellsouth.com>; "Gardner, Deborah L" <Deborah.Gardner@bellsouth.com>
Cc: <MCampbell@nuvox.com>; "Christian, Scott" <Scott.Christian@bridge.bellsouth.com>
Sent: Wednesday, June 20, 2001 10:35 AM
Subject: RE: Percent Flow Through Report

> Mary,
>
> Here are your flow thru keys for April, 2001.
>
> April
> LNP Flow Through Key for Aggregate and Fatal Rejects
> #4 Trivergent (OCN 2505)
>
> Flow Thru Aggregate
> #35 Trivergent 2505
>
> UNE
> #20 Trivergent 2505
>
> Suzy Sherwood will send you the keys for May after the data is posted.
She has also put you on her list to send these every month. Let us know if
you have questions.
>
> Thanks,
> Debbie Gardner
>
>
>
>
>
>
> -----Original Message-----
> From: JanP.Strain@bridge.bellsouth.com
> [mailto:JanP.Strain@bridge.bellsouth.com]
> Sent: Tuesday, June 19, 2001 2:47 PM
> To: Deborah.Gardner@bellsouth.com
> Cc: MaryCampbell@nuvox.com; Scott.Christian@bridge.bellsouth.com
> Subject: Percent Flow Through Report
>

>
> Debbie,
>
> As you and I discussed, please supply Mary with Trivergent's Company
Number for
> the Percent Flow Through Service Requests Report for April and May. I
realize
> that the May report will not post until the 21st and the web will be down
on
> Wednesday. Trivergent is shown in PMAP as State Comm.
>
> Mary Campbell's telephone number is 864/967-4113.
>
> Should you have any questions, please call me.
>
> Thanks for your assistance.
>
> Jan
>

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Rebuttal Testimony and Exhibit of Mary H. Campbell on Behalf of NuVox Communications, Inc. has been furnished by (*) hand delivery or by U. S. Mail on this 20th day of July, 2001, to the following:

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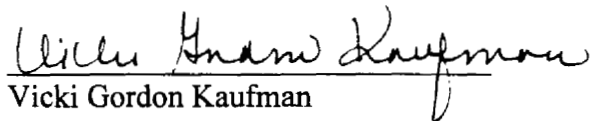
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