

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

REBUTTAL TESTIMONY

OF

ELINA PADFIELD

ON BEHALF OF XO FLORIDA, INC

JULY 20, 2001

4.3.03
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(x-ref. 08898-01)

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

2 A: My name is Elina Padfield. My business address is 105 Molloy St., Suite 300,
3 Nashville, Tennessee 37201.

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

5 A: I am a Senior Manager for XO Communications, Inc. ("XO").

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

8 A: I have nearly twenty years of experience in the telecommunications industry.
9 I spent fourteen years with MCI Telecommunications, nine of those as a
10 provisioner. I was later promoted to manager of the Provisioning Department.
11 I have been employed with XO for five years, three years as the Regional
12 Provisioning Manager and one and a half years as the manager of
13 Provisioning Support for the Region. I am presently Senior Manager of the
14 South Region Disconnect Center.

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

16 A: My testimony addresses Checklist Items 2 and 11 and rebuts BellSouth's
17 testimony that it has complied with these two Checklist items. With respect to
18 Checklist Item 2, my testimony demonstrates that BellSouth's performance
19 data is inaccurate and unreliable. My testimony rebuts the testimony of
20 BellSouth witness Cox who states that BellSouth performance data associated
21 with commercial usage shows that BellSouth has complied with the Checklist.
22 My testimony also presents XO's concerns about BellSouth's failure to meet
23 its obligation to provide local number portability (Checklist Item 11).

1 **BellSouth's Performance Data Is Inaccurate and Unreliable**

2 **Q: IS BELLSOUTH'S SELF-REPORTED DATA ACCURATE AND**
3 **RELIABLE?**

4 A: No. XO submits local service requests ("LSRs") to BellSouth via the
5 Electronic Data Interchange ("EDI") interface. XO's electronic systems
6 record the number of LSRs submitted by XO to BellSouth and the number of
7 responses received from BellSouth, including firm order confirmations
8 ("FOCs"). I compared XO's Florida data with BellSouth's self-reported data
9 and found that BellSouth did not include a significant number of transactions
10 in its reports.

11 **Q: WHAT DATA DID YOU COMPARE?**

12 A: I compared XO data on FOCs for orders for local number portability ("LNP")
13 and for orders for unbundled loops with LNP for Florida with BellSouth's
14 self-reported data.

15 **Q: WHAT DID YOU FIND?**

16 A: For May 2001, XO received 106 FOCs for LNP. BellSouth reports data on
17 FOC timeliness for LNP orders in its report "LNP Firm Order Timelines
18 Interval Distribution and Firm Order Confirmation Average Interval." The
19 BellSouth raw data file for this report is contained in the "Ordering: FOC
20 Timeliness (LNP)" file accessible via the PMAP website. BellSouth's file
21 reflects 86 LNP FOCs for May 2001 in Florida - 20 fewer LNP FOCs for May
22 than XO actually received. This is an error rate of nearly 20%.

23 **Q: DID XO FIND ANY OTHER INDICATIONS THAT THE PMAP DATA**

1 **IS UNRELIABLE?**

2 A: Yes. BellSouth's Parity Analysis and Remedy Information ("PARIS") data
3 for XO provides another illustration of the unreliability of BellSouth's
4 performance data. This data is used to calculate remedy payments ordered by
5 the Georgia Public Service Commission for BellSouth's failure to meet
6 Commission-established performance benchmarks. The purpose of discussing
7 this data here is simply to illustrate the discrepancies in the data BellSouth
8 utilizes. For example, for the month of April 2001, BellSouth's PMAP
9 website showed a total payment due XO of \$6,360. However, XO received a
10 check from BellSouth in June for \$134,179.16 for the April PARIS payment.

11 **Q: WHAT IS THE SIGNIFICANCE OF THIS LARGE DISCREPANCY**
12 **TO THIS PROCEEDING?**

13 A: This enormous discrepancy in the BellSouth data strongly suggests that the
14 XO data reported on the PMAP website for April severely overstates
15 BellSouth's performance. Likewise, other BellSouth self-reported data may
16 be similarly overstated.

17 **Q: HAVE THESE DISCREPANCIES CONTINUED?**

18 A: Yes. The PMAP website reported a total of \$480,260 in PARIS payments
19 due XO from BellSouth for performance benchmarks missed in May.
20 However, BellSouth has told XO that it will be receiving a payment of
21 \$31,000 for May. BellSouth offered no explanation for this discrepancy.
22 BellSouth provides no accounting to XO regarding the PARIS payments or
23 the basis for them, despite the huge discrepancies illustrated above.

1 **Q: DOES XO HAVE CONFIDENCE IN THE PMAP DATA?**

2 **A:** No. For the reasons described above, XO does not have confidence in
3 BellSouth's PMAP data. This data is not accurate and is not a reliable
4 indicator of BellSouth's performance.

5 **Number Portability (Checklist Item 11)**

6 **Q: IS BELLSOUTH MEETING ITS OBLIGATIONS UNDER**
7 **CHECKLIST ITEM 11?**

8 **A:** No. While BellSouth's Ms. Cox and Mr. Milner claim that BellSouth meets
9 this item, BellSouth's self-reported data demonstrate that BellSouth has not
10 complied with its obligations regarding number portability. The LNP-
11 Average Disconnect Timeliness Interval measures the time BellSouth takes to
12 disconnect its service after a customer has been ported to a ALEC. If a LNP
13 disconnect does not happen in a timely manner, the customer will not be
14 able to receive calls originating from BellSouth customers in the same central
15 office serving area. When BellSouth does handle a LNP disconnect properly,
16 the ALEC customer generally regards this as a problem caused by the ALEC.
17 The opposite is true. Nevertheless, the LNP disconnect problem can cause the
18 ALEC's new customer to lose confidence in the ALEC.

19 **Q: WHAT IS THE CURRENT BENCHMARK FOR THIS METRIC?**

20 **A:** The current benchmark for LNP-Disconnect Timeliness ordered by the
21 Commission is fifteen minutes.

22 **Q: WHAT DOES THE MAY FLORIDA DATA SHOW FOR XO?**

23 **A:** The May LNP-Average Disconnect Timeliness data for XO Communications

1 for Florida reported on BellSouth's PMAP website shows that BellSouth met
2 the benchmark for this measure only 3.72% of the time. BellSouth fell short
3 of this important measure nearly 97% of the time for the month of May in
4 Florida. Of a total of 430 transactions, only 16 were processed in a timely
5 manner.

6 **Q: WHY IS THIS IMPORTANT?**

7 A: Even accepting BellSouth's self-reported data as accurate (which XO does
8 not), this data demonstrates that XO is not meeting its obligations to provide
9 number portability.

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

11 A: Yes.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Rebuttal Testimony of Elina Padfield on Behalf of XO Florida, 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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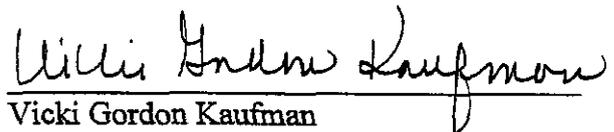
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