

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF RONALD M. PATE
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. TP-001305-TP
5 AUGUST 15, 2001
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH
8 TELECOMMUNICATIONS, INC., AND YOUR BUSINESS ADDRESS.
9

10 A. My name is Ronald M. Pate. I am employed by BellSouth
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12 Services. In this position, I handle certain issues related to local
13 interconnection matters, primarily operations support systems ("OSS").
14 My business address is 675 West Peachtree Street, Atlanta, Georgia
15 30375.

16
17 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS ARBITRATION?
18

19 A. Yes. I filed direct testimony on July 27, 2001.
20

21 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
22

23 A. The purpose of my rebuttal testimony is to address various issues raised
24 in the direct testimony filed by Supra on July 27, 2001 – specifically that of
25 Supra's witness Olukayode A. Ramos – in areas related to Operations

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1 Support Systems ("OSS"). I will respond to Mr. Ramos' allegations on
2 issues 5, 38, 46, 47, 51, 55, 57, 60, 61 and 62.

3

4 Q. DO YOU HAVE ANY GENERAL COMMENTS BEFORE YOU RESPOND
5 TO THE SPECIFIC ALLEGATIONS RAISED IN MR. RAMOS' DIRECT
6 TESTIMONY?

7

8 A. Yes. Before I begin my rebuttal testimony on the specific allegations
9 raised by Mr. Ramos, I believe it will be helpful to explain in general terms
10 BellSouth's OSS interfaces it has made available to ALECs. Next, I will
11 explain how BellSouth provides non-discriminatory access to its OSS for
12 pre-ordering, and ordering.

13

14 Q. WHAT IS THE PURPOSE OF YOUR GENERAL COMMENTS?

15

16 A. In these general comments, I will provide my understanding of Supra's
17 position as it relates to operations support systems ("OSS") and parity and
18 provide information relevant to the interfaces BellSouth makes available to
19 the ALEC community. This foundational information should help to set the
20 record straight on any items for which Supra's – witness, Mr. Ramos has
21 inappropriately characterized BellSouth's OSSs.

22

23 Q. WHAT IS YOUR UNDERSTANDING OF SUPRA'S POSITION ON
24 PARITY AS IT RELATES TO OSS?

25

1 A. Supra's position appears to be that BellSouth is required to provide the
2 ALEC community with electronic interfaces to support the submission of
3 service request (pre-ordering and ordering functionality) that are identical
4 to the interfaces which BellSouth deploys for its retail units.

5

6 Q. ON WHAT BASIS DO YOU MAKE THIS CONCLUSION?

7

8 A. First, Mr. Ramos states that under the current agreement, as well as both
9 Federal and State law, Supra is entitled to nondiscriminatory, direct
10 access to BellSouth's OSS (page 47, line 13 of his direct testimony).
11 Second, Mr. Ramos claims that the CPR Institute for Dispute Resolution
12 Arbitral Tribunal ordered BellSouth to provide Supra non-discriminatory,
13 direct access to all of its OSSs (page 25, lines 17 – 19). Finally, Mr.
14 Ramos states that BellSouth never intended to provide ALECs with the
15 same ordering experience that BellSouth provides itself (page 60, lines 16
16 – 18), Mr. Ramos requests direct access to BellSouth's OSS. In other
17 words, he submits that BellSouth is required to provide interfaces to Supra
18 identical to those utilized by BellSouth in the course of doing business with
19 its retail customers.

20

21 Q. HOW DO YOU RESPOND TO THIS POSITION?

22

23 A. Mr. Ramos is simply wrong. Mr. Ramos' premise is based on the notion
24 that anything BellSouth has, Supra should get, without regard to what the
25 Act or the FCC have said. This is all done under the guise of Supra's

1 unique (but incorrect) assessment of what constitutes parity. Supra
2 seems to think that anything less than exactly what BellSouth has will: (1)
3 disadvantage it in the competitive market, (2) violate parity, and/or (3)
4 violate the requirements of the Act and the FCC.

5

6 Q. DOES BELLSOUTH MEET THE REQUIREMENTS OF THE ACT AND
7 THE FCC?

8

9 A. Absolutely, and that requirement with regard to OSS is non-discriminatory
10 access. This is a requirement that has been clarified and well defined
11 time and time again in various orders and papers by the FCC. I will
12 discuss this in more detail later in this testimony. For now, let me state
13 that non-discriminatory access does not mean identical access, much less
14 identical interfaces for the submission of service requests.

15

16 Q. DO YOU HAVE OTHER COMMENTS REGARDING BELLSOUTH'S
17 NON-DISCRIMINATORY ACCESS TO ITS OSS?

18

19 A. Yes. At this time, I will move the focus of my discussion to BellSouth 's
20 non-discriminatory access to its OSS.

21

22 Q. DOES BELLSOUTH PROVIDE ALECS NON-DISCRIMINATORY
23 ACCESS TO ITS OSS?

24

1 A. Yes. BellSouth provides non-discriminatory access to its operations
2 support systems for pre-ordering, ordering, provisioning, maintenance and
3 repair, and billing. Since Mr. Ramos raises issues with regard to pre-
4 ordering and ordering, I will only address those functionalities.

5

6 As stated in my direct testimony, the FCC defined non-discriminatory
7 access to operations support systems to require an Incumbent Local
8 Exchange Carrier ("ILEC") to provide access to OSS that allows ALECs to
9 perform the functions of pre-ordering, ordering and provisioning for resale
10 services in substantially the same time and manner as BellSouth does for
11 itself; in the case of unbundled network elements the OSS access must,
12 provide an efficient competitor with a meaningful opportunity to compete.¹

13

14 Q. WHAT ELECTRONIC INTERFACES DOES BELLSOUTH OFFER ALECS
15 THAT ALLOWS ACCESS TO PRE-ORDERING AND ORDERING
16 FUNCTIONALITY?

17

18 A. The electronic interfaces are: TAG, RoboTAG™, EDI, and LENS. EDI
19 only provides ordering functionality. However, the other interfaces provide
20 both pre-ordering and ordering functionality.

21

22 Q. DOES THIS CONCLUDE YOUR GENERAL COMMENTS?

23

¹ Federal Communication Commission First Report and Order in CC Docket No. 96-98 and 95-185 released on April 8, 1996 at 312 and 518, hereinafter "First Report and Order".

1 A. Yes. Now I will address the specific allegations raised by Mr. Ramos.

2

3 ***Issue 5: Should BellSouth be required to provide to Supra a download of***
4 ***all BellSouth's Customer Service Records ("CSRs")?***

5

6 Q. ON PAGE 69 LINES 17 - 23 OF MR. RAMOS' TESTIMONY WITH
7 REFERENCE TO ISSUE 5, HE SAYS THAT BELLSOUTH HAS
8 REFUSED TO PROVIDE SUPRA WITH ANY INFORMATION
9 REGARDING ITS NETWORK. PLEASE COMMENT.

10 A. Mr. Ramos's comments are not clear. In order to determine exactly what
11 Mr. Ramos is referring to, I need more information.

12 However, my assumption is that Supra wants a download of CSRs for
13 those areas in which Supra markets its services. Supra apparently
14 believes that such a download is not a violation of the Customer
15 Proprietary Network Information ("CPNI") requirements of the Act, that a
16 download is necessary to allow Supra to place orders in a timely manner.

17

18 Supra is entitled to view customer service records only for those records
19 where the end-user customer has given specific permission to do so.

20 Thus, BellSouth is unwilling to provide a download of the BellSouth
21 customer service records. Providing Supra with a download of all CSRs,
22 without authorization of each and every BellSouth customer would
23 constitute a breach of confidentiality and privacy for which Supra is not
24 entitled.

1 Q. DOES MR. RAMOS SPEAK ANYWHERE IN HIS PREFILED DIRECT TO
2 ISSUE NUMBER 5?

3 A. No. The testimony filed by Mr. Ramos never does speak directly to this
4 issue, so BellSouth is unable to determine exactly what the issue is that
5 Supra is raising.

6

7 ***Issue 38: Is BellSouth required to provide Supra with non-discriminatory***
8 ***access the same databases, so that Supra performs the same functions as***
9 ***BellSouth?***

10 ***Issue 46: Should Supra Telecom be allowed the ability to submit orders***
11 ***electronically for all services and elements?***

12 ***Issue 47: Should BellSouth be required to allow Supra Telecom the ability***
13 ***to continue processing orders electronically after the electronic ordering,***
14 ***without subsequent manual processing by BellSouth personnel?***

15

16 Q. ON PAGE 48 OF MR. RAMOS' TESTIMONY, HE STATES, "BELLSOUTH
17 HAS WILLFULLY REFUSED TO PROVIDE SUPRA WITH ACCESS TO
18 THE SAME PRE-ORDERING AND ORDERING SYSTEMS USED BY
19 BELLSOUTH, INCLUDING RNS AND ROS. THIS ALONE
20 CONSTITUTES A VIOLATION OF THE UNES, UNE COMBO AND
21 PARITY PROVISIONS." PLEASE COMMENT.

1 A. BellSouth has neither willfully or intentionally refused to provide Supra or
2 any other ALEC with access to the same pre-ordering and ordering
3 systems BellSouth uses. BellSouth makes available pre-ordering and
4 ordering functionality via LENS, TAG, and RoboTAG. Additionally, for
5 ordering, BellSouth makes available EDI.

6
7 Moreover, Supra is obviously confused with its reference to parity. In fact,
8 stated in paragraph 87 of its Order on BellSouth's second 271 application
9 for Louisiana, the FCC reiterated its requirement stated in the Ameritech
10 Michigan Order and in the Local Competition First Report and Order "that
11 a BOC must offer access to competing carriers that is analogous to OSS
12 functions that a BOC provides to itself. Access to OSS functions must be
13 offered in 'substantially the same time and manner' as the BOC. For
14 those OSS functions that have no retail analogue . . . a BOC must offer
15 access sufficient to allow an efficient competitor a meaningful opportunity
16 to compete." The FCC reaffirmed this requirement in its orders granting
17 long distance relief to Bell Atlantic in New York (New York Order,
18 paragraphs 85-86) and Southwestern Bell in Texas (Texas Order,
19 paragraphs 94-95).² The orders require OSS access in substantially the
20 same time and manner. The orders do not call for parity nor do the orders
21 require identical access. Mr. Ramos has developed his own

² *Application by Bell Atlantic New York for authorization under Section 271 of the Communications Act to provide In-Region, InterLATA Service in the State of New York, Memorandum Opinion and Order and Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas, Memorandum and Opinion.*

1 interpretation of what the order requires which is inconsistent with what
2 the orders actually calls for.

3

4 Q. HAS THE COMMISSION PREVIOUSLY CONSIDERED SUPRA'S
5 REQUEST FOR DIRECT ACCESS?

6

7 A. Yes. This Commission addressed this issue in the complaint Supra filed
8 in Docket No. 980119-TP. In the Commission's Order, issued July 22,
9 1998, the Commission determined that, on the issue of electronic access
10 to OSS and OSS interfaces, "We agree with witness Stacy that BellSouth
11 is not required to provide Supra with the exact same interfaces that it uses
12 for its retail operations. Based on the evidence, it appears that BellSouth
13 has made available to Supra the electronic interfaces required in
14 Attachment 6 of the Interconnection Agreement. Therefore, we find that
15 BellSouth has provided the interfaces that are required by the
16 Interconnection Agreement between the parties." [Order No. PSC-98-
17 1001-FOF-TP @ page 23]

18

19 Q. ON PAGE 48 OF MR. RAMOS' TESTIMONY, HE STATES, "WHAT
20 BELL SOUTH HAS DONE WITH ITS OSS IS TO SEPARATE ALREADY-
21 COMBINED NETWORK ELEMENTS BEFORE LEASING SUCH
22 ELEMENTS TO SUPRA." DO YOU AGREE?

1 A. No. Supra is incorrect in its assessment of the Act. The OSS provision of
2 the Telecommunications Act for UNE and UNE combos requires that
3 BellSouth provide an efficient competitor with a meaningful opportunity to
4 compete.

5 Q. DOES BELLSOUTH PROVIDE A MEANINGFUL OPPORTUNITY TO
6 COMPLETE WITH THE ELECTRONIC INTERFACES IT MAKES
7 AVAILABLE TO ALECS?

8 A. Yes. As stated in my direct testimony, BellSouth makes available to
9 ALECs several interfaces for pre-ordering and ordering.

10 Q. UPON WHAT EVIDENCE DO YOU RELY TO SUPPORT BELLSOUTH'S
11 CLAIM THAT IT PROVIDES NON-DISCRIMINATORY ACCESS?

12 A. During May 2001, BellSouth received and processed 375,577 local
13 service requests electronically from ALECs. During this same period
14 BellSouth received 42,118 manual local service requests, which means
15 that BellSouth processed a total of 417,695 local service requests. Of this
16 figure, BellSouth received and processed 89.9% electronically.

17 Moreover, BellSouth processed 1, 523,064 electronic local service
18 requests during the first five months of this year. This figure represents a
19 significant increase in the volume of local service requests ALECs
20 submitted to BellSouth over the same period last year. During the first
21 five months of 2000, ALECS submitted 957,683 local service requests

1 electronically. This represents a 59% increase in the total number of local
2 service requests ALECS submitted electronically to BellSouth.

3 Q. ON PAGE 48 OF MR. RAMOS' TESTIMONY, HE STATES, "INSTEAD
4 OF PROVIDING SUPRA WITH THE ALREADY COMBINED OSS AS
5 REQUESTED BY SUPRA, BELL SOUTH HAS PROVIDED SUPRA WITH
6 A DEGRADED OSS." PLEASE COMMENT.

7 A. This is simply not true. As I stated earlier, BellSouth processed 375,577
8 local service requests electronically during May 2001.

9 BellSouth's OSS accepts local service requests which is the industry
10 standard for local ordering. BellSouth's retail operations utilize RNS and
11 ROS to generate service orders rather than process the local service
12 request submitted by ALECs. BellSouth's service order format does not
13 conform to the Ordering and Billing Forum ("OBF") industry standard of
14 local service request submitted by ALECs.

15 Q. ON PAGE 50 OF MR. RAMOS' TESTIMONY, HE STATES, "THUS, THE
16 FCC HAS ORDERED ILECS TO ALLOW CLECS TO USE THE SAME
17 OSS AS USED BY THE ILECS." DO YOU AGREE?

18 A. No. Mr. Ramos is mistaken. BellSouth provides ALECs with non-
19 discriminatory access to its OSS. The Telecommunications Act of 1996
20 ("Act"), together with FCC interpretations of the Act, require an incumbent
21 local exchange carrier ("ILEC") to:

- 1 • provide non-discriminatory access to its OSS on appropriate
- 2 terms and conditions;
- 3 • provide the documentation and support necessary for ALECs to
- 4 access and use these systems; and
- 5 • demonstrate that the ILEC's systems are operationally ready
- 6 and provide an appropriate level of performance.

7

8 Compliance with the requirements should allow competitors to obtain pre-
9 ordering information, execute service requests for resold services and
10 unbundled network elements ("UNEs"), report and manage troubles, and
11 obtain billing information. The level of access for all criteria should be
12 nondiscriminatory when compared to that of the ILEC's retail operations.
13 Therefore, FCC requires that BellSouth and other ILECs provide ALECs
14 with an electronic interface that allows competitive LEC's to access the
15 incumbent LEC's OSS.

16 Q. ON PAGE 50 OF MR. RAMOS' TESTIMONY, HE STATES, "THE
17 VARIOUS CLEC OSS MADE AVAILABLE BY BELLSOUTH TO SUPRA
18 DO NOT GIVE SUPRA NON-DISCRIMINATORY ACCESS TO ANY OF
19 THE FIVE OSS FUNCTIONS." DO YOU AGREE?

20 A. No. BellSouth provides ALECs non-discriminatory access to its OSS for
21 pre-ordering, ordering, provisioning, maintenance and repair, and billing
22 through reliable manual and electronic interfaces such as TAG, LENS,
23 RoboTAG™, EDI, TAFI, ECTA, ODUF, EODUF, and ADUF. BellSouth

1 provides ALECs with all the specifications necessary for integrating the
2 BellSouth interfaces, as required by the FCC. BellSouth makes the
3 human-to-machine interface Local Exchange Navigation System ("LENS")
4 available to ALECs that have made the business decision not to integrate
5 the machine-to-machine interfaces with their own internal OSS, and do not
6 want to expend the necessary resources to use RoboTAG™. For
7 requests that are designed to fall out for manual handling, as well as those
8 that can not be submitted electronically, BellSouth provides sufficient
9 personnel and processes for the handling of such requests. Accordingly,
10 BellSouth provides the necessary systems and personnel for non-
11 discriminatory access to BellSouth's OSS functions.

12

13 Because Supra's specific allegations relate to pre-ordering and ordering, I
14 am only addressing those interfaces.

15 Q. ON PAGE 52 OF MR. RAMOS' TESTIMONY, HE STATES, "WHILE
16 PATE ERRONEOUSLY DECLARES THAT THE ONLY DIFFERENCE IS
17 THE FLOW THROUGH OF CLEC LSRS (VIA LENS, TAG, ROBOTAG,
18 OR EDI) TO LEO AND LESOG, HIS ADMISSION OF THESE
19 DISCRIMINATORY PRACTICES IS VERY SIGNIFICANT." PLEASE
20 COMMENT.

21 A. Mr. Ramos is simply wrong. BellSouth's electronic ordering process is in
22 no way discriminatory. Mr. Ramos seems to imply that just because
23 ALECs submit industry standard local service requests rather than the

1 service order format BellSouth retail operations submits, that the process
2 is inherently discriminatory.

3 Mr. Ramos is incorrect in his assessment. BellSouth's rationale for
4 utilizing the industry standard format is one of providing ALECs a
5 standardized process for local service requests that could be adapted
6 nationally. Meaning, an ALEC could utilize the local service requests
7 submission guidelines in the BellSouth region as well as any other ILEC
8 region. For this reason, BellSouth believes this process is not
9 discriminatory.

10 Mr. Ramos' comments would lead this Commission to believe that just
11 because BellSouth does not offer the same pre-ordering and ordering
12 interfaces that BellSouth uses in its retail operation, that BellSouth
13 provides ALECs discriminatory assess. Mr. Ramos' argument is
14 ridiculous.

15 Mr. Ramos is attempting to change the requirements of the order to suit
16 Supra needs - when no court or this Commission have recommended or
17 ordered direct access.

18 BellSouth does not issue LSRs. It is totally inappropriate to compare
19 BellSouth's retail interfaces for submitting service requests – which utilize
20 a legacy system that is not compatible with the industry-standard LSR
21 format – to that of an ALEC issuing a service order format request via the
22 industry-standard LSR format. The issue is one of translation of an LSR-

1 formatted request to a format that can be accepted by BellSouth's Service
2 Order Communication System ("SOCS") for provisioning by further
3 downstream BellSouth's OSS legacy systems. The interfaces utilized by
4 BellSouth's retail units do not have to deal with this translation issue
5 because the retail requests are built in a SOCS-compatible format.

6

7 Mr. Ramos' testimony also suggests that it is a simple matter for BellSouth
8 to electronically input *any* order for a BellSouth retail customer, implying
9 that BellSouth does not offer non-discriminatory access, and that is not the
10 case. While true that BellSouth's retail requests can be electronically
11 transmitted, it is hardly a simple matter for BellSouth's service
12 representatives to input any order.

13

14 For most simple business products and services, BellSouth's retail
15 Regional Ordering System ("ROS") has process flows designed into the
16 system which allow a BellSouth service representative to follow a logical
17 step-by-step process using a point-and-click type of selection/entry
18 methodology to build a service order in SOCS-readable format.

19

20 For complex services, BellSouth representatives must manually enter that
21 request information into ROS in a "free-form" format, because there are no
22 process flows programmed within the ROS application to handle all of the
23 variables associated with the different types of complex services.

24

1 While the ultimate electronic input for a BellSouth retail complex order
2 may be the result of a single employee *manually* typing it, requests for
3 complex services are actually the result of a team of employees working to
4 develop the information necessary for that single employee to input the
5 request. That team might include the account team, system designers,
6 network specialists and other subject matter experts required for input of
7 information to the order.

8
9 Once that team has done its collective work, and the BellSouth service
10 representative has gathered and arranged all of the necessary
11 information, it is then typically written on a paper service order form. It is
12 from that form that the single employee inputs the order utilizing the ROS
13 interface, for example, for a business transaction. ROS then transmits the
14 SOCS-compatible formatted order and distributes it to the downstream
15 provisioning systems.

16
17 For ALECs placing a complex services request, the process is
18 substantially similar. It is still a team effort, but involves ALEC personnel
19 along with BellSouth account team representatives, system designers and
20 other BellSouth subject matter experts. Once the order information has
21 been gathered and arranged by the ALEC, it is then handed off via the
22 LSR process to BellSouth's Local Carrier Service Center ("LCSC"). This
23 process requires the ALEC to fill out an LSR for the requested service.

24

1 It is from this LSR that the BellSouth LCSC representative inputs the
2 request to the Direct Order Entry ("DOE") system. In other words, at that
3 point, a single employee types the order into DOE, which in turn puts the
4 information into a SOCS-compatible format, and distributes the order to
5 the same downstream service order and provisioning systems as does the
6 BellSouth retail order process. I reiterate that this is the same
7 "competitively neutral" situation as cited from the FPSC Docket No.
8 000731-TP.

9

10 Q. ON PAGE 52 OF MR. RAMOS' TESTIMONY, HE STATES, "WHILE,
11 LENS, TAG, ROBOTAG, AND EDI ARE WEB-BASED, BELLSOUTH'S
12 SYSTEMS ARE BASED ON ANSI-C PROTOCOL." PLEASE COMMENT.

13 A. Again, Mr. Ramos makes disparaging comments without offering any
14 basis for his assertion. Just because one protocol is used over another,
15 does not make it unreliable or unstable.

16 Q. ON PAGE 53 OF MR. RAMOS' TESTIMONY, HE STATES,
17 "MOREOVER, DOE AND SONGS, THE SYSTEMS PROVIDED TO THE
18 LCSC FOR THE REFORMATTING OF CLEC LSRS INTO BELLSOUTH
19 SERVICE ORDERS, AS ADMITTED BY PATE ARE OLD VERY
20 ARCHAIC, MORE OF A DOS FORMAT SYSTEMS AND MORE
21 DIFFICULT TO USE THAN RNS AND ROS." PLEASE COMMENT.

1 A. Mr. Ramos assertion is not entirely correct. BellSouth's service
2 representatives in the LCSC use DOE and associated systems to submit
3 service orders for ALEC local service requests. An ALEC's local service
4 request includes resale, UNE combinations, and UNE type services.

5
6 DOE is an input software program that is used to provide the BellSouth
7 SOCS with data in order to generate service order requests. The LCSC
8 processes mechanized LSRs that require manual handling and manual
9 LSRs submitted via facsimile using the DOE interface. The LCSC uses
10 the DOE interface because ROS and RNS do not support the resold and
11 UNE services ordered by ALECs.

12

13 Q. WHAT IS DOE AND WHY IS IT USED BY THE LCSC?

14

15 A. The DOE system is a distributed application that provides the BellSouth
16 Customer Service Representative with a method of generating orders for
17 telecommunications service for all types of accounts (residential, small
18 business, and large business). DOE accepts requests for BellSouth retail
19 product offerings as well as ALEC products and services.

20

21 DOE is made up of two separate pieces – DOE and DOE Support
22 Application ("DSAP"). The DOE portion of this system resides on a
23 midrange processor located in BellSouth's Data Centers. These servers
24 are AT&T 3B2 Model 400 systems. The DOE piece of the application is

1 responsible for the direct interface with the customer service
2 representative. It provides the customer service representative
3 mechanized order generation through the use of real-time data access
4 and real-time data edits.

5

6 The DSAP portion of the DOE system resides on MVS mainframe
7 computers located in several BellSouth Data Centers. The DSAP piece of
8 the application provides the interface between DOE and other BellSouth
9 "legacy" systems such as SOCS, ATLAS, BOCRIS, ORION, and
10 COFFI/PSIMS). The DSAP interface performs navigator contract
11 messaging between the legacy systems and DOE.

12

13 DOE was designed and implemented in the early 1980's. It is a reliable
14 system, with proven stability. The DOE interface accommodates both pre-
15 ordering and ordering functionalities that accesses the same BellSouth
16 OSSs for pre-ordering, ordering, and provisioning used by BellSouth's
17 Retail Operations.

18 BellSouth's Retail Operations developed OSS specific to their individual
19 specifications. The residential unit processes service orders via RNS –
20 the business unit processes service orders via ROS. Because ROS and
21 RNS functionality is limited, the LCSC service representative could use
22 these systems for some products, yet still be required to use DOE for
23 other products that ROS and RNS do not support. A UNE product, such

1 as UNE combinations purchased by Supra is an example of a product and
2 associated services that are not supported by ROS or RNS.

3 Q. ON PAGE 54 OF MR. RAMOS' TESTIMONY, HE STATES, "HOWEVER,
4 BELLSOUTH DOES ARGUE THAT IT HAS MADE VARIOUS OSS
5 AVAILABLE TO SUPRA (LENS, TAG, ROBOTAG AND EDI), AND THAT
6 SUPRA HAS CHOSEN TO USE AN INFERIOR SYSTEM (LENS) WHICH
7 IS THE ROOT OF SUPRA'S PROBLEMS." PLEASE COMMENT.

8 A. I strongly disagree with Mr. Ramos' assertion that LENS is inferior.
9 Neither I nor any other BellSouth representative has categorized LENS as
10 an inferior system. For Mr. Ramos to imply that BellSouth provides
11 ALECs access that is not equal to what BellSouth provides its retail
12 operations is utterly ridiculous. Further, Mr. Ramos fails to provide any
13 evidence to support his conclusion.

14
15 In contrast, as evidence to support my contention that LENS via a reliable
16 interface and provides ALECs pre-ordering and ordering functionality –
17 during the 12 months ending May 2001, ALECs submitted 2,178,899
18 LSRs through LENS. During this same period, ALECs submitted 423,641
19 LSRs through EDI and 972,151 through TAG. For Mr. Ramos to state that
20 LENS is inferior is completely without merit.

21

22 Q. DOES BELLSOUTH PROVIDE ALECS NON-DISCRIMINATORY
23 ACCESS TO ITS OSS?

24

1 A. Yes. As I stated in my direct testimony, BellSouth provides non-
2 discriminatory access to its OSS for ALECs via electronic and manual
3 interfaces. BellSouth provides access to its OSS via the following
4 electronic interfaces: EDI for ordering and provisioning; LENS, TAG, and
5 RoboTAG™ for pre-ordering and ordering. In conformance with the FCC's
6 requirements, these interfaces allow the ALECs to perform the functions of
7 pre-ordering and ordering for services in substantially the same time and
8 manner as BellSouth does for itself; and, in the case of unbundled network
9 elements, provide a reasonable competitor with a meaningful opportunity
10 to compete which is also in conformance with the FCC's requirements.
11 BellSouth is not obligated to provide ALECs with any additional access to
12 its OSS functions.

13

14 Q. UPON WHAT TYPES OF EVIDENCE WILL THE FCC RELY TO ASSESS
15 AN RBOC'S PROVISION OF NON-DISCRIMINATORY ACCESS TO
16 OSS?

17

18 A. As I stated previous, the FCC emphasized that commercial or operational
19 readiness can be evidenced in several ways: actual commercial usage,
20 carrier-to-carrier testing, independent third-party testing and internal
21 testing. The FCC has repeatedly stated that actual commercial usage is
22 the most probative evidence that OSS functions are operationally ready.
23 Bell Atlantic New York Order, ¶189. BellSouth's interfaces have been used
24 commercially for years. As will be shown more fully in the discussion of
25 each interface, the levels of commercial usage alone clearly demonstrate

1 the operational readiness of these interfaces. However, these interfaces
2 have also been subjected to extensive third-party testing and carrier-to-
3 carrier testing, as will be described below.

4
5 Q. WHAT HAS THE FCC SAID ABOUT INDEPENDENT THIRD-PARTY
6 OSS TESTING?

7
8 A. In its Bell Atlantic New York Order, the FCC stated that “the
9 persuasiveness of a third-party review is dependent on the conditions and
10 scope of the review.” In addition to scope, depth, and surrounding
11 conditions, the following qualities led the FCC “ . . . to treat the
12 conclusions in the KPMG Final Report as persuasive evidence of Bell
13 Atlantic’s OSS readiness.” These qualities are: independence, military-
14 style testing philosophy, efforts to place themselves in the position of an
15 actual market entrant, and efforts to maintain blindness when possible.
16 Bell Atlantic New York Order, ¶ 100. The independent third-party test
17 ordered by the GPSC has all of these qualities.

18
19 Q. HAS BELLSOUTH CONDUCTED CARRIER-TO-CARRIER TESTING OF
20 ITS ACCESS TO OSS?

21
22 A. Yes. Six ALECs participated in a carrier-to-carrier Beta test of LENS
23 Release 6.0 from September 13 through September 24, 1999. The
24 ALECs tested pre-ordering, the new “fast-path” ordering, the new screen
25 design and activity flows, the view function for LSR order information, the

1 changes to the main menu, the options for user administration (such as
2 the ability to change the company code and passwords), and the new bulk
3 ordering function. Because LENS Release 6.0 is dependent on TAG
4 Release 3.0 which was still in development in September, not all the
5 functionality of LENS was tested.

6
7 During the test, the six ALECs successfully submitted 8,184 LSRs through
8 LENS Release 6.0. During the first nine days, BellSouth limited each
9 ALEC to 50 LSRs per day (a total of 300 per day). On the final day,
10 BellSouth lifted the limit, and the ALECs submitted 2,591 LSRs.

11
12 Based on the success of the LENS Release 6.0 Beta test, the ALECs
13 asked BellSouth to put the Beta version of Release 6.0 into production
14 before the scheduled implementation on January 14, 2000. BellSouth
15 complied with that request, and on October 25, 1999, the Beta version of
16 LENS Release 6.0 went into production.

17
18 Q. HOW MANY ALECS USE LENS TO SUBMIT LOCAL SERVICE
19 REQUESTS TO BELLSOUTH?

20
21 A. Currently, there are 331 ALECs/OCNs using LENS. For the 12 months
22 ending May 2001, ALECs submitted 2,178,899 LSRs through LENS.
23 During this same period, ALECs submitted 423,641 LSRs through EDI
24 and 972,151 through TAG. For Mr. Ramos to state that LENS is inferior is
25 completely without merit.

1 Q. ON PAGE 54 OF MR. RAMOS' TESTIMONY, HE STATES, "IT IS
2 OBVIOUS THAT BELLSOUTH HAS DONE EXACTLY WHAT THE FCC
3 ORDERED IT NOT DO – PROVIDE PREFERENTIAL ACCESS TO A
4 NETWORK ELEMENT TO ITSELF." PLEASE COMMENT.

5
6 A. I disagree with Mr. Ramos. Mr. Ramos continues to argue that if the
7 access provided to an ALEC, by BellSouth is not identical to that provided
8 to BellSouth's retail units, that is ROS and RNS, it is discriminating. In fact,
9 the FCC requires, not identical access, but where technically feasible, that
10 access and unbundled network element provided by an incumbent LEC
11 must be at least equal-in-quality to that which the incumbent LEC provides
12 to itself. BellSouth has demonstrated through testimony and third party
13 tests that its ALEC OSS access and unbundled network element(s) are at
14 least equal-in-quality to that which it provides itself. Mr. Ramos is simply
15 not open to accepting the FCC's ruling in paragraph 312 of its Order.

16 Q. HAS BELLSOUTH PROVIDED SUPRA WITH NON-DISCRIMINATORY
17 ACCESS TO ITS OSS?

18 A. Yes.

19 Q. ON PAGE 54 OF MR. RAMOS' TESTIMONY, HE STATES,
20 "BELLSOUTH, WILLFULLY AND INTENTIONALLY CREATED A
21 SYSTEM WHICH PLACES ITS COMPETITORS AT A SEVERE
22 DISADVANTAGE. " PLEASE COMMENT.

1 A. Mr. Ramos is incorrect and offers no bases for his comments.

2 Q. ON PAGE 54 OF MR. RAMOS' TESTIMONY, HE STATES, "OF
3 COURSE, WHEN ONE COMPARES THIS TO THE PERCENTAGE
4 FLOW THROUGH OF SERVICE ORDERS THROUGH BELLSOUTH'S
5 RETAIL SYSTEMS, WHICH IS IN THE HIGH 90'S PERCENTILE, THERE
6 TRULY IS NO COMPARISON." PLEASE COMMENT.

7 A. I disagree with Mr. Ramos' assertion. Mr. Ramos would have this
8 Commission think that BellSouth's customer service representatives
9 magically learns how to issue service requests – when the fact of the
10 matter is that BellSouth spends a tremendous amount of time and money
11 on training its employees to become customer service representatives.
12 BellSouth believes that training is an essential component in developing a
13 highly skilled workforce. Typically, a BellSouth customer service
14 representative spends eight to ten weeks in initial training with
15 continuation training at set intervals.

16 It would be interesting to see how BellSouth's training compares to the
17 training Supra offers its employees. Supra would have this Commission
18 believe that its ordering difficulties are associated with BellSouth's OSS.
19 Supra blames its flow through problems on BellSouth's OSS while other
20 factors may need to be considered. Supra may not place a high enough
21 importance on training and development of its employees.

22

1 **Issue 51: Should BellSouth be allowed to impose a manual charge when it**
2 **fails to provide an electronic interface?**

3 Q. ON PAGE 87 OF MR. RAMOS' TESTIMONY, HE ASK THE QUESTION,
4 "SHOULD BELLSOUTH BE PERMITTED TO CHARGE SUPRA FOR
5 MANUAL OSS PROCESSING, WHEN BELLSOUTH'S OWN RETAIL
6 SYSTEMS ARE AUTOMATED, AND WHEN BELLSOUTH DOES NOT
7 MAKE ELECTRONIC OSS INTERFACES AVAILABLE TO ITS
8 COMPETITORS?" PLEASE COMMENT.

9 A. As I stated in my direct testimony, BellSouth is willing to include language
10 in Supra's agreement on this issue.

11

12 Q. ON PAGE 88 OF MR. RAMOS' TESTIMONY, HE STATES, "THE
13 FOLLOWING ARE EXAMPLES OF SERVICES FOR WHICH SUPRA
14 MUST SUBMIT MANUAL LSRS." IS MR. RAMOS CORRECT?

15 A. No. Mr. Ramos states that Supra must submit manual LSRs for – (1) Off
16 Premise Extensions; (2) T-1; (3) PRI; (4) BRI; (5) Megalink; (6) Frame
17 Relay; (7) Trunks; (8) ESSX; (9) Foreign Exchange; (10) Foreign Central
18 Office; (11) PBX; (12) Centrex; and, (13) virtually all other complex
19 services. While Mr. Ramos is correct that many of the products and
20 services listed require manual submission, his statement is not completely
21 accurate. Several of the products and services listed by Supra can be
22 submitted electronically. Specifically, ISDN BRI, PBX, PBX Trunks, and

1 T-1 Loops can be ordered electronically. The specific requests types and
2 activity types that can be ordered electronically along with the specific
3 product information are available on BellSouth's Interconnection Website.
4 If Mr. Ramos were interested in determining which products and services
5 could be ordered electronically, he should use the information BellSouth
6 provides via its Website. Moreover, Mr. Ramos should share that
7 information with his customer service representatives to ensure its
8 employees are familiar with the most up to date information available for
9 pre-ordering and ordering. This step might help Supra experience an
10 increase in its flow through metrics similar to those that other ALECs
11 experience.

12

13 ***Issue 55: Should BellSouth be required to provide an application-to-***
14 ***application access service order inquiry process?***

15

16 Q. ON PAGE 93 OF MR. RAMOS' TESTIMONY, HE STATES, "BELLSOUTH
17 SHOULD PROVIDE SUPRA WITH NON-DISCRIMINATORY, DIRECT
18 ACCESS TO THE SAME OSS THAT BELLSOUTH'S RETAIL DIVISIONS
19 USE TO OBTAIN PRE-ORDER INFORMATION ELECTRONICALLY FOR
20 UNES OR SERVICES ORDERED VIA ASR." PLEASE COMMENT.

21 A. Mr. Ramos is confused once again. BellSouth's retail divisions do not
22 order or provision UNEs. UNEs are wholesale products, not retail

1 products; therefore, BellSouth's retail OSS does not support this product
2 type.

3

4 ***Issue 57: Should BellSouth be required to provide downloads of RSAG,***
5 ***PLATS, PISIMS, and PIC databases without license agreements and without***
6 ***charges?***

7

8 Q. ON PAGE 95 – 96 MR. RAMOS' TESTIMONY REGARDING ISSUE 57,
9 HE STATES, "FIRST, SUPRA SHOULD BE PROVIDED WITH NON-
10 DISCRIMINATORY, DIRECT ACCESS TO THESE DATABASES THAT
11 BELLSOUTH'S RETAIL DEPARTMENTS ENJOY." PLEASE COMMENT.

12 A. As I discussed in more detailed earlier in my rebuttal testimony, the
13 Telecommunications Act does not require direct access. Second,
14 BellSouth makes available pre-ordering and ordering functionality which
15 accesses the necessary databases via LENS, TAG, RoboTAG, and EDI.
16 BellSouth provides access in a manner that is consistent with the Act
17 requires. BellSouth is not obligated to provide direct access.

18

19 ***Issue 60: When BellSouth rejects or clarifies a Supra Telecom order,***
20 ***should it be required to identify all errors in the order that would cause it to***
21 ***be rejected of clarified?***

1 Q. ON PAGE 98 OF MR. RAMOS' TESTIMONY, HE STATES,
2 "IDENTIFYING ALL ERRORS IN THE LSR OR ORDER WILL PREVENT
3 THE NEED FOR SUBMITTING THE LSR OR ORDER MULTIPLE
4 TIMES." PLEASE COMMENT.

5 A. As I stated in my direct testimony, BellSouth is willing to incorporate the
6 same language found in the MCI agreement on this issue. The exact
7 language can be found in John Ruscilli's direct testimony Exhibit JAR --1.

8

9 ***Issue 61: Should BellSouth be allowed to drop an order after ten days (or***
10 ***any other time period), when the order has been accepted by the front-end***
11 ***ordering system (such as LENS) but sent back into clarification by***
12 ***BellSouth? Alternately, if BellSouth drops any order, should it be required***
13 ***to notify Supra telecom the same day the order has been dropped?***

14

15 Q. ON PAGE 101 OF MR. RAMOS' TESTIMONY, HE STATES, "OF
16 COURSE, IF SUPRA WERE PROVIDED WITH NON-DISCRIMINATORY,
17 DIRECT ACCESS TO BELLSOUTH'S RETAIL OSS, THIS WOULD BE A
18 MOOT ISSUE. BELLSOUTH DOES NOT PURGE ITS OWN RETAIL
19 ORDERS AFTER 10 DAYS. TO PURGE SUPRA'S LSRS OR ORDERS
20 AFTER 10 DAYS IS DISCRIMINATORY, AND SHOULD NOT BE
21 ALLOWED." PLEASE COMMENT.

1 A. BellSouth requires its customer service representatives to resolve orders
2 in error status daily. Service orders in error status represent customer
3 requests. BellSouth believes that it is not prudent to have unresolved
4 errors for an extended period of time – if errors are left unresolved
5 customer satisfaction will suffer. I believe that there is a direct correlation
6 between unresolved errors and customer satisfaction levels. More
7 importantly, Supra should be concerned with its end-user satisfaction
8 level.

9

10 ***Issue 62: Should BellSouth be required to provide completion notices for***
11 ***manual orders?***

12

13 Q. ON PAGE 103 OF MR. RAMOS' TESTIMONY, HE STATES,
14 "BELLSOUTH SHOULD THEREFORE BE REQUIRED TO PROVIDE
15 COMPLETION NOTICES FOR MANUAL LSRS OR ORDERS." PLEASE
16 COMMENT.

17 A. I do not agree that BellSouth should be required to submit a completion
18 notice for a local service requests submitted manually. BellSouth provides
19 an efficient means via a Web-based interface for completion status.
20 CLEC Service Ordering Tracking ("CSOTS") provides completion notice
21 information for manually submitted local service requests. This region-
22 wide Web-based electronic interface allows ALECs to view service orders

1 on-line, track service orders, and determine the status of their service
2 orders. Region-wide, 320 ALECs are using CSOTS.

3
4 Q. DO YOU HAVE ANY CLOSING COMMENTS?

5
6 A. Yes. In conclusion, Supra witness Ramos has made many claims and
7 allegations, most often unsubstantiated. Such unsubstantiated claims and
8 allegations are extremely difficult to respond to and rebut. For that
9 reason, I have attempted to provide a more balanced approach in my
10 responses to the issues raised by both.

11
12 This Commission should take Supra's claims and allegations with a grain
13 of salt and examine closely the motives for their charges. I would only
14 hope that this Commission recommends that Supra take a more active
15 role in the Change Control Process and partner with BellSouth as they
16 work towards effectively pursuing the opportunities available to all ALECs.
17 Granted, the Change Control Process may not resolve all issues raised by
18 Supra, but it is important to work within the process that has been
19 designed - based on a collaborative effort with ALECs - to handle many of
20 the issues Supra raises.

21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

22
23 A. YES.

24