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BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL TESTIMONY OF CLYDE L. GREENE  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 001305-TP  
AUGUST 15, 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. ARE YOU THE SAME CLYDE L. GREENE WHO EARLIER FILED  
DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS  
PROCEEDING?

1 A. The purpose of my rebuttal testimony is to address billing related comments  
2 that have been made in the Direct Testimony of Supra witness Carol Bentley in  
3 this docket. Specifically, I will address comments made by Ms. Bentley that  
4 are associated with issues 41, 42, and 48.

5

6 Q. HAVE THE PARTIES DISCUSSED EACH OF THESE ISSUES IN AN  
7 INTER-COMPANY REVIEW BOARD MEETING AS ORDERED BY THE  
8 FLORIDA PUBLIC SERVICE COMMISSION?

9

10 A. The parties have discussed Issues 41 and 42 in Inter-company Review Board  
11 meetings; however, they have not discussed Issue 48. Although Supra has  
12 identified Issue 48, they have refused to discuss this issue with BellSouth in the  
13 meetings.

14

15 ***Issue 41: Should BellSouth be required to provide Supra Telecom the right to audit***  
16 ***BellSouth's books and records in order to confirm the accuracy of BellSouth's***  
17 ***bills?***

18

19 Q. ON PAGE 10 OF HER DIRECT TESTIMONY, SUPRA WITNESS CAROL  
20 BENTLEY STATES: "IT IS REASONABLE HOWEVER, FOR SUPRA TO  
21 CONDUCT PERIODIC AUDITS OF BELL SOUTH'S UNDERLYING  
22 DATA, PROCEDURES, SYSTEMS AND PROCESSES, PURSUANT TO  
23 GAAS, IN ORDER TO INSURE THAT SUPRA IS RECEIVING  
24 REASONABLY ACCURATE BILLS." DO YOU AGREE?

25

1 A. Yes. As I explained in my direct testimony, BellSouth has agreed to include  
2 language in the Agreement that gives Supra the right to audit the bills  
3 BellSouth provides to Supra. Any claim by Supra that BellSouth is not willing  
4 to allow audits of the invoices provided to Supra is false.

5  
6 Q. ON PAGE 9 OF HER TESTIMONY, MS. BENTLEY STATES THAT THE  
7 ONLY REASONABLE ALTERNATIVE [TO AUDITS] IS TO REQUIRE  
8 BELL SOUTH TO PROVIDE [SUPRA WITH] DIRECT ACCESS TO ITS  
9 ORDERING, PROVISIONING, RATING AND BILLING SYSTEMS.  
10 PLEASE COMMENT.

11  
12 A. First of all, since BellSouth is willing to allow Supra to audit its bills, the  
13 discussion of alternatives to audits is irrelevant. Secondly, I disagree with Ms.  
14 Bentley on the point that it would be reasonable to require BellSouth to provide  
15 Supra with direct access to BellSouth's ordering, provisioning, rating and  
16 billing systems. It would not be reasonable to require BellSouth to provide  
17 such access for four main reasons: 1) access to internal BellSouth systems is  
18 not necessary in order for Supra to verify the bills that they receive from  
19 BellSouth, 2) BellSouth is not responsible for providing or maintaining Supra's  
20 end user customer records, 3) BellSouth does not provide this type of direct  
21 access to any of its other customers, and 4) the requested access is not needed  
22 by Supra to successfully compete. Finally, BellSouth already provides Supra  
23 and all of its other ALEC customers with nondiscriminatory access to its  
24 operations support systems ("OSS"). BellSouth provides this  
25 nondiscriminatory access through various manual and electronic interfaces

1           which include Optional Daily Usage File (“ODUF”), Access Daily Usage File  
2           (“ADUF”), and Expanded Optional Daily Usage File (“EODUF”). The subject  
3           of nondiscriminatory access to BellSouth’s OSS is discussed in more detail by  
4           Mr. Pate.

5

6   ***Issue 42: What is the proper time frame for either party to render bills?***

7

8   Q.    ON PAGE 11 OF HER TESTIMONY MS. BENTLEY STATES THAT  
9           SUPRA IS NOT ASKING ANY PARTY TO WAIVE ITS STATUTORY  
10          RIGHTS TO COLLECT CHARGES FOR SERVICES PROVIDED, BUT  
11          SIMPLY SUGGESTING THAT BILLS FOR THOSE SERVICES MUST BE  
12          RENDERED WITHIN A REASONABLE TIME FRAME. PLEASE  
13          COMMENT?

14

15   A.    BellSouth agrees that neither party should waive its statutory rights to collect  
16          charges for services provided. Furthermore, I would also like to point out that  
17          BellSouth is fully committed to providing the most timely, accurate and  
18          complete bills possible. However, as stated in my direct testimony, there are  
19          instances where BellSouth relies on billing information from either third  
20          parties or from Supra itself to bill accurately. In these cases, BellSouth should  
21          be permitted to bill charges to the full extent allowed by law rather than  
22          artificial time limits proposed by Supra.

23

24   ***Issue 48: Is BellSouth obligated to provide Supra Telecom with billing records? If***  
25   ***so, which records should be provided and in what format?***

1 Q. ON PAGE 12 OF HER TESTIMONY, MS. BENTLEY STATES THAT  
2 BELLSOUTH SHOULD BE REQUIRED TO PROVIDE ALL OF THE  
3 UNDERLYING BILLING RECORDS IN INDUSTRY STANDARD  
4 FORMATS AS WELL AS TO PERIODICALLY VALIDATE THAT THE  
5 RECORDS IT [BELLSOUTH] HAS SUPPLIED ARE COMPLETE, TRUE  
6 AND ACCURATE? PLEASE COMMENT.

7

8 A. The only billing records that BellSouth should be required to provide to Supra  
9 are Supra's invoices and the usage records that BellSouth records that are  
10 necessary for Supra to bill its end users for usage events. All other data needed  
11 to bill its end users (rates, account information, etc.) is the responsibility of  
12 Supra to maintain, and BellSouth should not be required to provide end user  
13 information for Supra or any of its other customers.

14

15 Furthermore, BellSouth has several processes and controls in place to monitor  
16 and verify the timeliness, accuracy and completeness of the billing information  
17 that is provided to its customers. In addition, as discussed above for Issue 41,  
18 BellSouth has agreed to include language in the Agreement that gives Supra  
19 the right to audit the bills BellSouth provides to Supra.

20

21 Q. DOES BELLSOUTH PROVIDE SUPRA WITH THE NECESSARY  
22 BILLING RECORDS?

23

24 A. Yes. BellSouth provides Supra with nondiscriminatory access to Supra's  
25 invoices and usage data. Furthermore, as stated in my direct testimony,

1 BellSouth provides and is willing to continue to provide Supra with billing  
2 records consistent with EMI guidelines, which include all EMI standard fields  
3 as requested by Supra. These billing records are provided so that Supra can  
4 bill its end users in the same time and manner as BellSouth does for its  
5 customers.

6

7 Q. ON PAGE 12 OF HER DIRECT TESTIMONY, MS. BENTLEY STATES  
8 THAT, AS AN ALTERNATIVE, BELLSOUTH SHOULD PROVIDE  
9 SUPRA WITH DIRECT ACCESS TO ALL OF THE NETWORK  
10 ELEMENTS THAT EITHER GENERATE OR HOUSE BILLING DATA  
11 AND ALL OF THE ORDERING, PROVISIONING, RATING AND BILLING  
12 SYSTEMS. PLEASE COMMENT.

13

14 A. The data that Supra has requested is not housed in a network element.  
15 Furthermore, BellSouth should not be required to provide Supra or any other  
16 customer with direct access to the internal guts of its billing system. As I  
17 stated above, BellSouth already provides Supra and other ALEC customers  
18 with nondiscriminatory access to its OSS. This nondiscriminatory access  
19 should be sufficient for Supra to successfully compete, bill its end user  
20 customers and verify its invoices from BellSouth. BellSouth provides all of the  
21 necessary billing information to its customers without the need to also provide  
22 any customers with direct access to the internal databases or processes that are  
23 mentioned by Ms. Bentley.

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1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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3 A. Yes.

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