

ORIGINAL

Legal Department

PATRICK W. TURNER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0761

August 20, 2001

Mrs. Blanca S. Bayó
Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 010740-TP (IDS Telcom)

Dear Ms. Bayó:

10270-01
10264-01
10269-01
10271-01
10263-01
Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Ken Ainsworth, Sandra Harris, Janet Millerfields, Petra Pryor, John Ruscilli, Beth Shiroishi, and Jerry Wilson, which we ask that you file in the captioned docket.
10266-01
10265-01

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,

Patrick W. Turner

Patrick W. Turner

(28)

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

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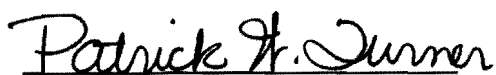
CERTIFICATE OF SERVICE
Docket No. 010740-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*), Electronic mail and Federal Express this 20th day of August, 2001 to the following:

Mary Anne Helton (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Te. No. (850) 413-6096
mhelton@psc.state.fl.us

Suzanne Fannon Summerlin
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax No. (850) 656-5589
summerlin@nettally.com
Represents IDS

Michael Noshay, President
IDS Long Distance, Inc.
n/k/a IDS Telcom, LLC
1525 N.W. 167th Street
Second Floor
Miami, Florida 33169
Tel. No. (305) 913-4000
Fax No. (305) 913-4039
mnoshay@idstelcom.com


Patrick W. Turner (at)

1 Bellsouth Telecommunications, Inc.

2 Direct Testimony of Petra Pryor

3 Before the Florida Public Service Commission

4 Docket No. 010740-TP

5 August 20, 2001

6

7 Q. Please state your name, position, and business
8 address with Bellsouth Telecommunications, Inc.
9 (hereinafter referred to as "Bellsouth" or "the
10 company").

11

12 A. My name is Petra Pryor. I am employed by BellSouth as Sales Assistant Vice
13 President, Interconnection Services. My business address is 600 N. 19th Street,
14 10th Floor, Birmingham, Alabama 35203.

15

16 Q. Please summarize your educational background and
17 career experience.

18

19 A. I earned a business degree from Faulkner University. In 1987, I began
20 employment with BellSouth Advanced Systems as an Account Executive. In that
21 position, I sold customer-premises equipment ("CPE") and network services to a
22 group of retail customers. My next position in BellSouth was as a Headquarters
23 Staff Manager. In that position, I provided technical support for our field forces
24 on CPE as well as network services. I then became a Support Manager in the
25 large business retail organization. In that role, I managed Systems Designers and

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1 Service Consultants who provided pricing, network design, and implementation of
2 our products and services for general size retail customers. Next, I assumed the
3 role of Center Manager in the Small Business Retail organization. In this
4 capacity, I managed a group of Account Executives and Systems Designers in an
5 Inside Sales Center.

6
7 Three years ago, I joined the wholesale business unit, Interconnection Services, as
8 Sales Assistant Vice President. In this position, I have responsibility for
9 managing Sales Teams, Account Executives, Systems Designers and Industrial
10 Specialists who interface with our wholesale customers. I also have responsibility
11 for the Complex Resale Support Group. This group processes service inquiries for
12 both complex resale services and UNE orders.

13
14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15
16 A. The purpose of my testimony is to address IDS' placement on May 8, 2000, of a
17 bulk conversion order (as opposed to an individual account order) to convert its
18 resale accounts to UNE-P accounts through BellSouth's Local Exchange
19 Navigation System ("LENS"). I will refer to this incident as the "Bulk Ordering
20 Incident". I will also address the discussions between BellSouth and IDS that
21 occurred after the Bulk Ordering Incident.

22
23 Q. PLEASE EXPLAIN THE EVENTS LEADING UP TO THE BULK ORDERING
24 INCIDENT.

25

1 A. In early 2000, BellSouth was developing a process that would allow an alternative
2 local exchange carrier (“ALEC”) to submit a bulk order to convert multiple resale
3 accounts to UNE-P accounts through LENS. Up to that time, LENS only
4 accepted orders to convert from resale service to UNE-P on either a line-by-line or
5 an account-by-account basis. BellSouth discussed beta testing the bulk ordering
6 process with IDS. The main objective of this beta testing was to evaluate and
7 validate the bulk ordering process for switched port/loop combinations (i.e., UNE-
8 P). This beta testing was also intended to allow IDS to examine these new
9 functions and, if necessary, to allow the LENS team to take any required
10 corrective action, and to allow IDS an opportunity to provide feedback.

11
12 In order to conduct a successful beta test, it is necessary to analyze data from
13 order entry all the way through to rendering of the first bill. Unfortunately, IDS’
14 billing cycle did not coincide with this requirement. As I will discuss in more
15 detail below, BellSouth did beta test with IDS, but not until after May 2000.

16
17 Q. HOW DID BELLSOUTH COMMUNICATE TO ALECS BELLSOUTH’S
18 PROCESS FOR BULK ORDERING?

19
20 A. As a result of internal miscommunications, BellSouth’s Sales Operations group
21 mistakenly notified ALECs that LENS could support bulk conversions from resale
22 to UNE-P before the Operations Systems Group at BellSouth had determined that
23 the bulk ordering feature was, in fact, ready to be used by ALECs. For instance, at
24 BellSouth’s annual ALEC Inforum on May 2-3, 2000, BellSouth’s Sales

1 Operations representatives announced to the attending ALECs that LENS could
2 support bulk ordering. This announcement was made in error.

3

4 Q. DID IDS USE LENS TO MAKE A BULK ORDER OF RESALE TO UNE-P
5 CONVERSIONS? IF SO, DID IDS EXPERIENCE ANY PROBLEMS?

6

7 A. Yes. After the announcement at the Inforum, IDS submitted approximately 1200
8 orders through LENS. On May 8, 2000, it was brought to my attention that IDS
9 had submitted these orders, and that approximately 400 - or one-third - of the
10 affected orders resulted in loss of service. Of the 400 orders that lost service, the
11 majority experienced the loss of the hunting feature but did not lose dial tone.
12 However, a very few of IDS' customers did lose dial tone.

13

14 Q. ARE YOU AWARE OF ANY OTHER ALECS BESIDES IDS THAT
15 SUBMITTED A BULK ORDER THROUGH LENS TO CONVERT FROM
16 RESALE TO UNE-P?

17

18 A. No.

19

20 Q. WHAT DID BELLSOUTH DO AFTER THE BULK ORDERING INCIDENT?

21

22 A. After BellSouth received calls from IDS regarding the number of service outages
23 its customers experienced as a result of the Bulk Ordering Incident, BellSouth's
24 employees at the Local Carrier Service Center ("LCSC") worked around the clock
25 to restore service for those customers as soon as possible. This work effort is

1 discussed in more detail in the testimony of BellSouth witness Ken Ainsworth. In
2 most cases, BellSouth was able to restore service within a couple of days. After
3 two weeks, BellSouth had restored service to all of IDS' customers who lost
4 service as a result of the Bulk Ordering Incident. In addition, BellSouth blocked
5 access to the bulk ordering process to prevent any other ALEC from experiencing
6 the same problems as had IDS. ALECs today cannot submit a bulk conversion
7 order for UNE-P through LENS.

8
9 Q. DID BELLSOUTH OFFER TO DO ANYTHING TO HELP IDS CONVERT
10 ADDITIONAL LINES AFTER THE BULK ORDERING INCIDENT?

11
12 A. Yes. Recognizing that IDS desired to convert approximately 2500 to 3000
13 additional lines after the Bulk Ordering Incident, BellSouth offered to beta test the
14 bulk ordering process with IDS. On May 17, 2000, I sent a letter to IDS
15 specifying the terms of the beta test. My letter, which is attached as Exhibit KK-3
16 to Keith Kramer's direct testimony, was incorrectly dated April 17, 2000. I called
17 Mr. Kramer after my office sent out the letter to inform him that the letter was
18 incorrectly dated.

19
20 Q. DID IDS AGREE TO PARTICIPATE IN THE BETA TEST? IF SO, WAS IDS
21 ABLE TO CONVERT THE REMAINING LINES?

22
23 A. IDS did agree to participate in the beta test. The beta test was ended June 9,
24 2000, to allow BellSouth an opportunity to analyze the test results. I would note
25 that IDS' submission of orders during the beta test was, at best, sporadic.

1 Through June 2nd, IDS had submitted 845 orders. The week of June 5th, IDS
2 submitted approximately 300 orders. On one day, IDS submitted only 29 lines to
3 be converted.

4
5 Q. DID BELLSOUTH ATTEMPT TO REACH A SETTLEMENT WITH IDS
6 REGARDING THE BULK ORDERING INCIDENT?

7
8 A. Yes. Although I hesitate to describe settlement discussions between BellSouth
9 and IDS because the parties considered these discussions to be confidential,
10 BellSouth recognized that IDS' customers experienced service problems as a
11 result of the Bulk Ordering Incident. Consequently, after reviewing IDS' claims
12 and without admitting any liability, BellSouth made several good faith
13 confidential settlement offers. IDS rejected all of BellSouth's offers.

14
15 Q. DID BELLSOUTH EVER OFFER IDS \$2.4 MILLION TO SETTLE ANY OF
16 ITS CLAIMS, AS ALLEGED BY MR. KRAMER?

17
18 A. No. In the fall of 2000, IDS was behind approximately \$2 Million dollars in its
19 payments to BellSouth. IDS apparently believed that, because of the Bulk
20 Ordering Incident, it did not owe BellSouth some of that money. Nonetheless,
21 IDS did acknowledge that a portion of the delinquent amount should be paid. In
22 an attempt to resolve this issue, I asked Mr. Kramer to submit through the billing
23 dispute process his claim of \$929,000 which he contended represented the
24 difference between the resale price and the UNE-P price for six months. I also
25 asked Mr. Kramer to submit in writing to me his claim for \$1.4 Million in

1 damages along with supporting documentation. Both of these actions were
2 necessary to enable BellSouth to review and formally respond to his claims
3 through BellSouth's normal procedures. After a thorough review of the billing
4 dispute, BellSouth denied IDS' claim for \$929,000. Further, because BellSouth is
5 not liable for consequential damages under the BellSouth/IDS Interconnection
6 Agreement, BellSouth also denied IDS' claim for damages.

7
8 Q. HAS BELLSOUTH PROVIDED IDS WITH ANY CREDIT ON ITS BILLING
9 AS A RESULT OF THE BULK ORDERING INCIDENT?

10
11 A. Yes. In August 2000, BellSouth gave IDS a credit of approximately \$31,000.
12 This figure represents BellSouth's billing for the number of lines that experienced
13 service problems as a result of the Bulk Ordering Incident.

14
15 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

16
17 A. Yes.

18
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