BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF JERRY L. WILSON

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 010740-TP

AUGUST 20, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR ADDRESS.

A. My name Jerry L. Wilson. I am employed by BellSouth as Senior Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I graduated from Mississippi State University in 1972 with a Bachelor of Science Degree in Electrical Engineering. In 1978, I earned a Master of Science Degree in Management from Pace University, New York. I have over 30 years of experience in the telecommunications industry and have held various positions in Network, Marketing, Planning, and Regulatory during my career.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have previously testified before numerous state regulatory commissions on various matters related to my present job and to previous jobs that I have held.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address the following two issues:

Issue 1. Has Bellsouth breached its Interconnection Agreement with IDS by failing to provide IDS OSS parity?

Issue 5. What remedies, if any, should the Commission order BellSouth to provide IDS in the event IDS proves that BellSouth has breached the Interconnection Agreement or engaged in anticompetitive activities?

I will specifically address the requested remedy of direct real-time access to BellSouth's DOE and SONGS. I will show that BellSouth provides nondiscriminatory access to operations support systems ("OSS") functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing of interconnection, resold retail telecommunications services and Unbundled Network Elements ("UNEs").

Q. PLEASE DESCRIBE BELLSOUTH'S OBLIGATION UNDER THE TELECOMMUNICATIONS ACT TO PROVIDE ALECs WITH NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS.

A. BellSouth is required by the Telecommunications Act to provide non-discriminatory access to its OSS for the purposes of providing the functionality of pre-ordering, ordering, provisioning, maintenance and repair and billing.

Q. HOW DOES THE FCC DEFINE NON-DISCRIMINATORY ACCESS TO OSS?

A. According to the FCC an Incumbent Local Exchange Carrier ("ILEC") such as BellSouth must provide access to OSS that allows ALECs to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for resale services in substantially the same time and manner as BellSouth does for itself; and, in the case of unbundled network elements to provide an efficient competitor with a meaningful opportunity to compete[1].

Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

A. Yes. In paragraph 87 of its Order on BellSouth's second section 271 application for Louisiana, the FCC reiterated its requirement stated in the

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

Ameritech Michigan Order and in its First Report and Order "that a BOC must offer access to competing carriers that is equivalent to the access the BOC provides itself in the case of OSS functions that are analogous to OSS functions that a BOC provides to itself. Access to OSS functions must be offered such that competing carriers are able to perform OSS functions in 'substantially the same time and manner' as the BOC. For those OSS functions that have no retail analogue . . . a BOC must offer access sufficient to allow an efficient competitor a meaningful opportunity to compete." The FCC reaffirmed this requirement in its orders granting long distance relief to Bell Atlantic in New York (New York Order, ¶¶85-86) and Southwestern Bell in Texas (Texas Order, ¶¶ 94-95)

Q. HOW DOES THE FCC PROPOSE TO DETERMINE THAT A BOC IS PROVIDING NON-DISCRIMINATORY ACCESS TO ITS OSS?

A. The FCC follows a two-step approach to determine if the BOC has met the non-discrimination standard for each OSS function. First the FCC will determine "whether the BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and whether the BOC is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them." Next, the FCC will determine "whether the OSS functions that the BOC has deployed are operationally ready, as a practical matter." This includes an examination of "performance measurements and other evidence of commercial readiness." *See Second Louisiana Order*, ¶ 85.

Q. HOW DOES BELLSOUTH PROVIDE ALECs WITH NON-DISCRIMINATORY ACCESS TO ITS OSS?

A. BellSouth provides non-discriminatory access to its OSS for ALECs via electronic and manual interfaces. BellSouth provides access to its OSS via the following electronic interfaces: Electronic Data Interchange ("EDI") for ordering and provisioning; Local Exchange Navigation System ("LENS"), Telecommunications Access Gateway ("TAG"), and RoboTAG™ for pre-ordering, ordering and provisioning; Trouble Analysis and Facilities Interface ("TAFI") for maintenance and repair; and Electronic Communications Trouble Administration ("ECTA") for maintenance and repair. For the function of billing, BellSouth provides Access Daily Usage File ("ADUF"), Enhanced Optional Daily Usage File ("EODUF") and Optional Daily Usage File ("ODUF"). In conformance with the FCC's requirements, these interfaces allow the ALECs to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for services in substantially the same time and manner as BellSouth does for itself; and, in the case of unbundled network elements, provide an efficient competitor with a meaningful opportunity to compete which is also in conformance with the FCC's requirements.

Q. UPON WHAT TYPES OF EVIDENCE WILL THE FCC RELY TO ASSESS AN ILEC's PROVISION OF NON-DISCRIMINATORY ACCESS TO ITS OSS?

A. The FCC emphasized that commercial or operational readiness can be evidenced in several ways: actual commercial usage, carrier-to-carrier testing, independent third party testing and internal testing. The FCC has repeatedly stated that actual commercial usage is the most probative evidence that OSS functions are operationally ready (Bell Atlantic New York Order, ¶ 89). BellSouth's interfaces have been used commercially for years. The levels of commercial usage alone clearly demonstrate the operational readiness of these interfaces. In addition, however, these interfaces have also been subjected to extensive third party testing and carrier-to-carrier testing.

Q. WHAT ARE THE METHODS AVAILABLE TO ALECs FOR SUBMITTING SERVICE REQUESTS TO BELLSOUTH FOR RESALE, UNEs, AND INTERCONNECTION?

A. BellSouth has designed and implemented a variety of electronic interfaces to suit the varied business plans and entry methods of the ALECs in the region. An ALEC's selection of an interface depends on its business plan and entry strategy. ALECs can select from among the interfaces described below to match their particular mix of services, volume of orders, technical expertise, resources, and future plans. The following chart depicts the entry methods and the interfaces from which an ALEC may choose:

	Resale	UNEs	Facility-Based	Data
Pre-Ordering	TAG	TAG	TAG	TAG

	LENS	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™	RoboTAG™
Ordering & Provisioning	EDI	EDI	EDI	EDI
	TAG	TAG	TAG	TAG
	LENS	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™	RoboTAG™
Maintenance & Repair	TAFI	TAFI (Tel Number-based)	TAFI	TAFI
	ECTA	ECTA	ECTA	ECTA
Billing	EODUF	ADUF	ODUF	N/A
	ODUF	ODUF		

Q. DOES BELLSOUTH ALLOW ALECs TO SUBMIT LOCAL SERVICE REQUESTS ("LSRs") MANUALLY AS WELL AS ELECTRONICALLY?

A. Yes. BellSouth does not require ALECs to transmit LSRs only by electronic interfaces, but instead allows transmittal through manual interfaces for those ALECs that have made the business decision to use only manual entry methods. BellSouth has established the Local Carrier Service Centers ("LCSCs") to serve as the point of contact for manual processing of LSRs.

Q. HOW DOES BELLSOUTH PROVIDE ALECs WITH MACHINE-TO-MACHINE ACCESS TO ITS PRE-ORDERING AND ORDERING OSS?

A. BellSouth provides ALECs with access to the same pre-ordering, ordering, and provisioning OSS accessed by BellSouth's retail units through the machine-to-machine Telecommunications Access Gateway ("TAG") interface. TAG, which was developed in response to specific requests from mid-sized and large CLECs, provides a standard Application Programming Interface ("API") to BellSouth's pre-ordering, ordering, and provisioning OSS. TAG is based on Common Object Request Broker Architecture ("CORBA"), which is one of the industry protocols for pre-ordering. TAG follows the Ordering and Billing Forum ("OBF") guidelines for LSRs. TAG pre-ordering has been available since August 31, 1998 and TAG ordering has been available since November 1, 1998. There are two ways for ALECs to connect to TAG: LAN-to-LAN and the Internet.

In addition to TAG, BellSouth provides ALECs with access to the same ordering and provisioning OSS accessed by the BellSouth retail units through the machine-to- machine Electronic Data Interchange ("EDI") interface for ALECs. EDI is not used to access pre-ordering OSS. EDI follows the protocol (EDI) that was established for ordering and the OBF guidelines for LSRs. EDI has been available to any interested ALECs since December 1996. There are several EDI connectivity options available: dedicated point-to-point connections; dial-up connections; and Value-Added Network ("VAN") connections.

Q. PLEASE DISCUSS INTEGRATION WITH RESPECT TO TAG AND EDI.

A. In accordance with the FCC's requirements, BellSouth provides ALECs with all the specifications necessary for integrating the BellSouth interfaces. An ALECs may integrate ordering and pre-ordering functions by integrating the TAG pre-ordering interface with the EDI ordering interface, or by integrating TAG pre-ordering with TAG ordering.

ALECs have taken the specifications provided by BellSouth and have successfully integrated the TAG pre-ordering interface with the EDI and TAG ordering interfaces. Because integration takes place on the ALECs' side, BellSouth cannot specify exactly how many ALECs have integrated the interfaces. However, BellSouth believes that at least six (6) ALECs have integrated the TAG pre-ordering interface with the EDI interface and at least forty-three (43) ALECs have integrated TAG pre-ordering with TAG ordering. Four (4) ALECs, Cox Communications, Network Telephone Corporation, CenturyTel, and NewSouth Communications- have purchased and integrated TAG pre-ordering and EDI ordering gateways built by DSET. (Please see DSET's Web site, www.dset.com for the press releases naming these ALECs.)

Q. DOES BELLSOUTH OFFER ALECs OTHER OPTIONS FOR MACHINE-TO-MACHINE OSS INTERFACES?

A. Yes. BellSouth recognizes that some ALECs have decided not to make the investment necessary to develop the integrateable machine-to-

machine TAG and EDI interfaces. BellSouth, therefore, offers the ALECs other interfaces to suit their needs and business plans.

Some ALECs may wish to use TAG for pre-ordering and ordering, so that they have the ability to use their own databases, without the necessity of making the investment in programmers to develop and maintain their own TAG interface. For these ALECs, BellSouth offers a software package called "RoboTAG™." This software was developed by Science Applications International Corporation (SAIC), under contract with BellSouth. RoboTAG™ provides a standardized, browser-based interface to the TAG gateway that resides on an ALEC's LAN server, and integrates pre-ordering and ordering with up-front editing. RoboTAG™ became available in November 1999. The first ALECs that purchased RoboTAG™ completed testing and was ready for production on November 24, 1999. Five (5) ALECs are currently using RoboTAG™. A sixth ALEC (Cox Communications) is in the process of establishing RoboTAG.

BellSouth provides substantial support to ALECs using RoboTAG™. This support includes: performing a site survey before installation of RoboTAG™; developing a detailed project plan for installation; performing installation of RoboTAG™ (including training the ALEC's system administrator); providing the initial training for end users; providing a help desk; and providing any required fixes. BellSouth also is responsible for providing ALECs with updated versions of RoboTAG™. In other words, as TAG evolves with new releases, ALECs using RoboTAG™ will

automatically receive upgrades of TAG.

ALECs using RoboTAG™ need a separate server or one with adequate space to store all of its TAG transactions. This server allows the ALEC to integrate the information obtained through TAG with its own internal OSS, and eliminates the need for ALECs to perform any dual entry of information. The ALEC must maintain licenses for certain third-party software (NT Server, Cold Fusion, Sequel Server, and Orbix). The ALEC is also responsible for participating in the RoboTAG™ User Group.

Another option available to ALECs is to choose to use solutions developed by third-party vendors. Albion International, Inc., Telcordia Technologies, Exceleron Software, Inc., DSET Corporation, Mantiss, Nightfire Software, Quintessent, and Eftia, for example, have developed electronic interfaces to connect and integrate ALECs' systems with BellSouth's OSS. In addition to the ALECs (mentioned earlier) that have purchased DSET's gateway solution, various press releases note CLECs such as Sprint, Now Communications, Teleconex, Rhythms, Covad, DSLNet, and Adelphia Business Solutions are using third-party solutions.

Q. DOES BELLSOUTH OFFER ALECs A HUMAN-TO-MACHINE INTERFACE?

A. Yes. For ALECs that have made the business decision not to integrate pre-ordering, ordering and provisioning interfaces with their own internal

OSS, and do not want to expend the resources necessary to use RoboTAG™, BellSouth makes available the human-to-machine LENS interface. LENS is a Web-based graphical user interface ("GUI"). LENS requires software development only on BellSouth's side of the interface. BellSouth therefore is responsible for implementing any changes or new versions of the interface. With the implementation of Release 6.0 of LENS on January 14, 2000, LENS became a GUI to the TAG gateway. LENS uses TAG's architecture and gateway, and therefore has TAG's pre-ordering functionality for resale services and UNEs, and TAG's ordering functionality for resale services. With Release 6.2 on April 15, 2000, LENS began using TAG's ordering functionality for designed and non-designed unbundled analog loops, unbundled digital loops, and for ALECs with the applicable contract provisions, unbundled two-wire analog port plus two-wire analog loop combinations (the "UNE Platform"). LENS provides integrated pre-ordering and ordering in its firm order mode. In order to use LENS, an ALEC must have, at a minimum, a personal computer, Web browser software, and an Internet connection (of course, the ALEC must also test with BellSouth, attend training, and obtain a password). LENS has been available since April 1997.

Q. DO ALECs HAVE A MEANS TO TRACK THEIR SERVICE ORDERS?

A. Yes. In December 1999, the CLEC Service Order Tracking System ("CSOTS") became available to ALECs. This region-wide Web-based electronic interface allows ALECs to view service orders on-line, track

service orders, and determine the status of their service orders. Region-wide, 320 ALECs are using CSOTS.

Q. HOW DOES CSOTS COMPARE TO LENS?

A. A direct comparison of CSOTS and LENS is not appropriate. LENs is a human-to-machine electronic pre-ordering and ordering interface. CSOTS is not used for pre-ordering and ordering of ALEC services. These systems are used for different purposes and, therefore, are not subject to a direct comparison.

Q. CAN BELLSOUTH ELECTRONICALLY PROCESS ALL LSRs?

A. No. Appropriately 90% of all LSRs currently submitted to BellSouth by ALECs are submitted electronically. However, some UNEs and complex resold services require manual handling. The manual processes used by BellSouth are accomplished in substantially the same time and manner as the processes used for BellSouth's complex retail services. The specialized and complicated nature of complex services, together with the relatively low volume of orders for them relative to basic exchange services, renders them less suitable for mechanization, whether for resale or retail applications. Complex, variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing many low volume complex retail services for its own retail operations would be an imprudent business decision, in that the benefits of mechanization would

not justify the cost.

Q. DOES NONDISCRIMINATORY OSS ACCESS NECESSARILY REQUIRE THAT ALL LOCAL SERVICE REQUESTS BE PROCESSED ELECTRONICALLY AND INVOLVE NO MANUAL PROCESSES?

A. No. The FCC has clearly determined that non-discriminatory access does not require that all LSRs be submitted electronically and involve no manual processes. Indeed, in approving Bell Atlantic-New York's section 271 application, the FCC stated that it specifically disagreed with "AT&T's assertion that Bell Atlantic must demonstrate that it provides an integratable, application-to-application interface for maintenance and repair." (FCC Order 99-404 in CC Docket 99-295, ¶ 215). The FCC found that "the lack of integration does not necessarily constitute discriminatory access, provided that the BOC otherwise demonstrates that it provides equivalent access to its maintenance and repair functions." *(Id).* The FCC then concluded that Bell Atlantic satisfied its obligations by "demonstrating that it offers competitors substantially the same means of accessing maintenance and repair functions as Bell Atlantic's retail operations." *(Id.)* This is exactly what BellSouth offers to ALECs.

Q. HAS BELLSOUTH DEVELOPED A PROCESS TO MANAGE CHANGES TO THE INTERFACES IT PROVIDES TO THE ALECs?

A. Yes. Working closely with the ALEC community, BellSouth has developed the Change Control Process ("CCP").

Q. PLEASE DESCRIBE THE CCP.

A. The CCP is the process by which BellSouth and the ALECs manage requested changes to the ALEC interfaces, handle the introduction of new interfaces, and provide for the identification and resolution of issues related to change requests. This process covers change requests that affect external users of BellSouth's electronic interfaces, associated manual process improvements, performance or the ability to provide service including defect notification, whether discovered by the ALECs or by BellSouth.

Q. WHO CAN PARTICIPATE IN THE CCP?

A. A company wishing to participate in the CCP must be certified as an ALEC by one of the state-level utilities commissions in the BellSouth nine-state region in order to be a participating ALEC in the CCP. Once this basic criteria is met, gaining a free membership is simply a matter of registering with the Change Control group at BellSouth.

Additionally, vendors representing certified ALECs are also entitled to be members, and, of course, BellSouth is a member as administrator of the CCP.

Q. HOW MANY ALECs AND VENDORS PARTICIPATE IN BELLSOUTH'S CHANGE CONTROL PROCESS?

A. Approximately 300 ALECs are actively doing business in the BellSouth region. Of these, approximately 100 (as of November 30, 2000) are registered members of the CCP. There are approximately 10 qualified vendors who are registered members.

In addition to the ALECs and vendors, there are observers (non-voting members) in regular attendance at the meetings and/or on the conference calls, including the Public Service Commissions from Florida and Georgia, the Department of Justice, and KPMG Consulting, LLC, which has oversight of Third Party Testing [2] in Florida and Georgia.

Q. HOW DOES BELLSOUTH PROMOTE THE CCP AND ENCOURAGE ALECs TO PARTICIPATE?

A. The account team assigned during the initial start-up period for an ALEC informs the ALEC of the CCP. All of the benefits of membership are outlined for the ALEC, along with the location of the CCP's web site. ALECs are strongly encouraged to actively participate, as the CCP is the primary forum for ALECs to be involved with the decision-making process

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[2] Third Party Testing is the process ordered by the Florida and Georgia PSCs to determine whether BellSouth's provision of access to OSS functionality enables and supports ALECS entry into the local market.

regarding interface change requests, as well as a way to be kept informed of issues related to those change requests.

Q. IS IDS AN ACTIVE PARTICIPANT IN THE CCP?

A. Yes. IDS is a registered member of the CCP and, according to the minutes of the various meetings, a representative of IDS has attended in person or participated via the telephone conference bridge.

Q. HAS IDS TAKEN ADVANTAGE OF ITS MEMBERSHIP IN THE CCP BY SUBMITTING CHANGE REQUESTS AS A MEANS OF NOTIFYING BELLSOUTH OF SITUATIONS THAT IDS BELIEVES TO BE DETRIMENTAL TO ITS ABILITY TO OPERATE AS AN EFFICIENT ALEC?

A. No. Although the CCP is the appropriate forum for IDS's OSS issues to be addressed, a check of the CCP Change Request log indicates only one such request by IDS on any OSS issue (Change Request No. 273, related to the need to order Remote Call Forwarding via the LENS interface. This request was jointly reviewed by BellSouth and the ALEC participants, and it was jointly prioritized as 32nd in the ranking of changes to be adopted.

Q. WHAT IS FLOW-THROUGH?

A. Flow-through for an ALEC LSR occurs when the complete and correct electronically-submitted LSR is sent via one of the ALEC ordering interfaces (EDI, TAG, RoboTAG™, or LENS), flows through the mechanical edit checking and Local Exchange Service Order Generator ("LESOG") system, is mechanically transformed into a service order by LESOG, and is accepted by the Service Order Communications System ("SOCS") without any human intervention.

Q. IS IT FEASIBLE FOR LSRs FOR ALL COMPLEX SERVICES TO BE SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE BELLSOUTH SYSTEMS?

A. No. As I discussed earlier in my testimony, many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. The orders at issue here are those that the ALEC may submit electronically, but then will fall out by design. In most cases, these orders are complex orders. For certain orders, BellSouth has, for the ease of the ALEC, allowed them to be submitted electronically even though such orders will be manually processed by BellSouth. The specialized and complicated nature of complex services, together with their relatively low volume of orders as compared to basic exchange services, renders them less suitable for mechanization, whether for retail or resale applications. As I stated earlier, complex, variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing many lower-volume complex

retail services would be an imprudent business decision, given that the benefits of mechanization would not justify the cost.

Q. WHAT ARE THE PRIMARY REASONS THAT ELECTRONICALLY SUBMITTED ORDERS FALL OUT BY DESIGN FOR MANUAL HANDLING?

A. There are two main reasons that electronically submitted orders are designed to fall out for manual handling. The first reason is that the LESOG has not been programmed to handle requests for certain types of products and services, typically complex services. Another example might be the inability to justify the economics of programming for some types of low ordering volume products and services.

The second reason for designed fallout concerns unique circumstances related to the LSR. Requests with pricing plans specific to the ALEC, requests which have other related requests being processed, and subsequent requests on an account prior to the new telephone number being posted to the billing system are all examples of LSRs that are subject to fallout due to unique circumstances.

Q. WHY ARE LSRs SOMETIMES RETURNED TO ALECs FOR CLARIFICATION?

A. Requests for clarification are generally sent to ALECs as a result of the required fields on a local service request not having been completely and accurately populated by the ALEC.

Q. WHAT IS THE IMPACT OF SUBMITTING LSRs THAT ARE INCOMPLETE AND INACCURATE?

A. Failure to submit a complete and accurate LSR will result in a clarification or a rejection. Receiving a clarification or rejection could affect the confirmation date an ALEC expects. Time is of the essence. Not until the LSR is corrected and resubmitted can the request be processed for provisioning.

Q. DO BELLSOUTH'S ALEC INTERFACES PROVIDE IDS WITH NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS?

A. Yes. BellSouth's obligations to provide non-discriminatory access has been summarized previously in my testimony. Non-discriminatory access (as opposed to the term "parity") has been defined by the FCC. BellSouth is meeting its obligations for non-discriminatory OSS access and this obligation is currently being further assessed by the Commission through independent third party tests in Docket Nos. 960786-TL and 981834-TP.

Q. WHEN A BELLSOUTH SERVICE REPRESENTATIVE TAKES AN ORDER FROM A BELLSOUTH RETAIL CUSTOMER, DOES THE

SERVICE REPRESENTATIVE INPUT THE ORDER DIRECTLY INTO DOE OR SONGS?

A. No. Direct Order Entry ("DOE") and Service Order Negotiation Generation System ("SONGS") were used for these purposes in the past. Today, however, DOE and SONGS are used primarily by representatives in the LCSC to enter ALEC orders that were submitted manually by the ALEC.

Currently, retail service representatives negotiating most types of retail service requests with residential consumers uses the Regional Negotiation System ("RNS") while BellSouth retail service representatives negotiating with business customers utilize the Regional Ordering System ("ROS"). RNS and ROS are not designed to support BellSouth's Resale or UNE offerings and are not compliant with the industry accepted Ordering and Billing Forum ("OBF") guidelines for interconnection procedures.

Q. DOES THE FACT THAT BELLSOUTH USES RNS AND ROS FOR ITS RETAIL UNITS WHILE OFFERING DIFFERENT ELECTRONIC INTERFACES TO ALECs MEAN THAT BELLSOUTH IS NOT PROVIDING ALECs WITH NONDISCRIMINATORY ACCESS TO OSS?

A No. Identical systems are neither necessary nor required for a number of reasons. First, IDS appears to seek direct access to DOE/SONGS because it believes that BellSouth's retail units use these systems. Again, DOE/SONGS are not the systems used by BellSouth's retail units for most

retail residence or business services.

Second, BellSouth provides ALECs with due date intervals in a nondiscriminatory manner. These due date intervals are designed to be at parity with the due date intervals BellSouth provides its retail customers. Performance measurements to ensure that such parity is achieved are being addressed by this Commission in Docket No. 000121-TP, and this issue will be addressed by the Commission in deciding upon BellSouth's 271 application in Docket No. 960786-TL.

Third, BellSouth provides IDS with nondiscriminatory access to BellSouth's OSS. IDS can utilize Electronic Data Interchange ("EDI"), Telecommunications Access Gateway ("TAG") and RoboTAG™ interfaces to achieve an integrated system. Instead, IDS chooses to primarily use LENS electronic interface, which does not offer the integration capabilities of TAG, RoboTAG™ or EDI.

In summary, BellSouth offers ALECs access to the same OSS used by RNS and ROS through the machine-to-machine Electronic Data Interchange, Telecommunications Access Gateway and RoboTAG™interfaces. ALECs may, as discussed previously in my testimony, integrate pre-ordering, ordering, and provisioning interfaces with their own internal OSS and essentially have similar features that BellSouth has built into its retail ROS/RNS systems. Additionally, ALECs

may choose to submit LSRs via a human-to-machine interface, LENS or manually.

Q. DOES BELLSOUTH RECORD DATA REGARDING FALLOUT RATES FOR LSRs SUBMITTED BY ALECs?

A. A thorough analysis of a given ALEC's fallout for manual handling would require the assistance of that ALEC by providing an exhibit with specific order information. I would point out, however, that some orders are designed for fallout, and subsequent manual handling. Information concerning planned manual fallout can be obtained in Performance Measurement and Analysis Platform ("PMAP"), Service Quality Measurements Plan Report on BellSouth's website:

https://PMAP.bellsouth.com

Q. DOES BELLSOUTH UPDATE LENS IN A TIMELY FASHION?

A. Yes. LENS, is the interface to BellSouth's Customer Service Records ("CSRs") and it reflects the most current posted information.. In most instances, the CSR is updated within 24 to 48 hours of an order being posted error-free to the CRIS system. I am not aware of unusual delays in posting completed orders or delays in updating CSRs.

Q. CAN AN ALEC LIKE IDS USE ELECTRONIC INTERFACES TO ORDER UNE-P?

A. Yes. The loop-port combination, sometimes called the "UNE Platform" or "UNE-P," is a two-wire voice grade port and voice grade loop UNE combination. This offering provides a combined two-wire voice grade (measured) port, switching functionality, shared interoffice transport, tandem switching, and a voice grade loop (designed or non-designed) to create an end user-to-end user transmission path that provides basic local exchange service. The UNE-P first became available with flow-through in March 1998. In February 1999, BellSouth implemented UNE-P with electronic ordering and flow-through for all ALECs. ALECs can use EDI, TAG, or LENS to order UNE-P.

Q. IN YOUR OPINION, SHOULD THE FLORIDA PUBLIC SERVICE COMMISSION ORDER BELLSOUTH TO PROVIDE IDS WITH DIRECT ACCESS TO BELLSOUTH'S DOE AND SONGS SYSTEMS IN A FASHION IDENTICAL TO BELLSOUTH'S ACCESS TO SUCH SYSTEMS?

A. No. The Florida Public Service Commission should not order direct ALEC access to DOE/SONGS for the following reasons:

DOE and SONGS are our older systems that, over time, are being replaced (by ROS and RNS, for example);

There are capacity limitations and our ability to expand DOE is increasingly limited by unavailability of necessary equipment;

DOE and SONGS do not have the needed security elements to protect customer information should direct access be allowed to all ALECs;

Methods and procedures are only developed for the BellSouth service representative and would require development and/or modification for ALECs in a direct access environment;

While the nondiscriminatory interfaces for ALECs are based on national standards, DOE/SONGS are not Ordering and Billing Forum compliant; and,

Non-discriminatory access via BellSouth's robust and reliable ALEC electronic and manual interfaces already is available to IDS.

For these reasons, direct access to DOE and SONGS is unnecessary.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.