

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF SANDRA HARRIS
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 010740-TP
5 AUGUST 20, 2001
6

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

10 A. My name is Sandra Harris. My business address is 3535 Colonnade Parkway, E3A,
11 Birmingham, AL 35243. I am currently Project Manager – Switch Combinations
12 Products, Network Services Customer Services.
13

14 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH
15 BELL SOUTH.
16

17 A. I earned a Bachelor of Science degree from Birmingham Southern College in 1984 and an
18 MBA from Nova Southeastern University in 1994. I began my career with South Central
19 Bell in 1971. I have worked for BellSouth as an operator, service representative, staff
20 support manager, product manager, strategic planner, finance manager and regional
21 service order standards manager.
22

23 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?
24

25 A. The purpose of my testimony is to address the operational aspect of Issue No. 2 which

1 reads:

2 *Has BellSouth breached its Interconnection Agreement with IDS by failing to provide*
3 *IDS Unbundled Network Elements (“UNEs”) and Unbundled Network Element-*
4 *Platforms (“UNE-Ps”) at parity?”*

5
6 Specifically, I will address the manner in which BellSouth processes IDS’ requests to
7 convert from BellSouth retail or resold services to IDS UNE-P services.

8
9 Q. ARE YOU FAMILIAR WITH THE MANNER IN WHICH METHODS AND
10 PROCEDURES (“M&Ps”) WERE DEVELOPED FOR PROVISIONING UNE-P
11 ARRANGEMENTS FOR ALTERNATIVE LOCAL EXCHANGE CARRIERS
12 (“ALECs”)?

13
14 A. Yes. Since January, 2000, I have served as Project Manager on the UNE-P Project Team.
15 This team was established to develop UNE-P product provisioning for ALECs in
16 compliance with the FCC’s UNE Remand Order¹ by the February 12, 2000 deadline
17 established in that Order.

18
19 Q. WHEN YOU WERE NAMED PROJECT MANAGER OF THE UNE-P PROJECT
20 TEAM, WERE YOU GIVEN ANY GUIDANCE AS TO WHAT THE TEAM WAS
21 SUPPOSED TO ACCOMPLISH?

22
23 A. Yes. The UNE-P Project Team was directed to deliver a high-quality, FCC-compliant
24 product by the date required in the FCC’s UNE Remand Order by considering alternative

¹ See Third Report and Order and Fourth Further Notice of Proposed Rulemaking, FCC 99-238, released November 5, 1999 (“UNE Remand Order”).

1 methods of provisioning UNE-P to ALECs, implementing an appropriate alternative
2 method, identifying risks associated with that method, and developing workable solutions
3 to appropriately address those risks.
4

5 Q. BEFORE YOU TELL US HOW THE UNE-P PROJECT TEAM WENT ABOUT
6 DOING THAT, COULD YOU TELL US WHAT HAS TO HAPPEN WHEN AN ALEC
7 ORDERS UNE-P TO SERVE AN END USER THAT IS NOT CURRENTLY
8 RECEIVING RETAIL SERVICE FROM BELL SOUTH OR RESOLD SERVICE FROM
9 ANOTHER ALEC?
10

11 A. In these situations, BellSouth is not providing retail service to the end user and it is not
12 providing resold service to the ALEC. Thus, there is no existing service that has to be
13 disconnected. Instead, BellSouth must provision the requested new facilities and bill the
14 ALEC for the UNE-P products the ALEC has ordered from BellSouth.² This is similar to
15 the situation that exists when a retail customer orders new service from BellSouth – a
16 new service has to be installed, and billing for that service has to begin.
17

18 Q. BY WAY OF COMPARISON, PLEASE EXPLAIN WHAT HAS TO HAPPEN WHEN
19 AN ALEC ORDERS UNE-P TO SERVE A CUSTOMER THAT IS CURRENTLY
20 RECEIVING RETAIL SERVICE FROM BELL SOUTH OR RESOLD SERVICE FROM
21 ANOTHER ALEC?
22

23 A. In these situations, BellSouth is already provisioning service to the end user's premises.

² My testimony does not attempt to address whether the ALEC is appropriately billed cost-based rates or market-based rates for UNE combinations. That issue is addressed by other BellSouth witnesses.

1 If BellSouth is providing retail service to the end user, BellSouth is billing the end user at
2 retail rates. After the conversion from retail to UNE-P, however, BellSouth will no
3 longer be billing the end user at all. BellSouth, therefore, has to generate a final bill for
4 that end user. Additionally, after the conversion from retail to UNE-P, BellSouth has to
5 bill the ALEC for the UNE-P services BellSouth is providing to that ALEC. This
6 requires BellSouth to take the steps necessary to generate these bills, such as changing the
7 line class codes and the USOCs associated with the service to reflect the fact that UNE-P
8 (rather than retail) service is being provided.

9
10 Similarly, if BellSouth is providing resold service to the ALEC, BellSouth is billing the
11 ALEC at resale rates. After the conversion from resale to UNE-P, however, BellSouth
12 will be billing the ALEC at UNE-P rates. BellSouth, therefore, has to generate a final
13 resale bill for the ALEC, and it has to start billing the ALEC for the UNE-P services
14 BellSouth is providing to that ALEC. This requires BellSouth to take the steps necessary
15 to generate these bills, such as changing the line class codes and the Universal Service
16 Order Codes (“USOCs”) associated with the service to reflect the fact that UNE-P (rather
17 than resale) service is being provided.

18
19 The UNE-P project team had to determine how to effect these necessary changes when an
20 ALEC places an order that requires a conversion from retail service or resale service to
21 UNE-P.

22
23 Q. HOW DID THE UNE-P PROJECT TEAM DECIDE HOW TO EFFECT THESE
24 NECESSARY CHANGES WHEN A RETAIL SERVICE OR RESALE SERVICE IS
25 CONVERTED TO UNE-P?

- 1 A. The project team evaluated several alternative methods of processing ALEC orders to
2 convert retail or resale service to UNE-P. These alternatives included:
3
- 4 • Issuance of a single record type order (“R”) to effect required changes. An R
5 order, however, only supports certain minor changes, such as change of billing
6 address. It does not support changes in the type of service or equipment.
7 Additionally, R orders do not trigger final bills. The issuance of a single R order,
8 therefore, was determined not to be a viable solution.
9
 - 10 • Issuance of 3 orders. Under this alternative, a disconnect (“D”) order would be
11 issued to stop the current retail or resale billing and to generate a final bill. A new
12 (“N”) order would be issued to make the necessary changes to the USOCs that are
13 required to correctly initiate new billing for the UNE-P. Finally, a change (“C”)
14 order would be issued to make the necessary changes to the line class codes that
15 are required to correctly initiate the new billing for the UNE-P. This alternative
16 was determined to be unacceptable because it was extremely labor intensive and
17 carried a high risk of creating incorrect billing due to the possibility of line class
18 codes not being changed in the affected switches. Incorrect line class codes would
19 affect measured element rating and ALEC required daily usage file information.
20
 - 21 • Issue no service orders. This alternative would involve the use of spreadsheets to
22 identify all necessary changes. Once these changes were identified, each would
23 have to be worked in the appropriate systems in a synchronized fashion. This
24 alternative was determined to be unacceptable because it was very labor intensive,
25 and it created a high risk of incorrect billing situations given that the affected

1 work groups would have to implement required changes in a coordinated fashion
2 and almost simultaneously.

3
4 • Issue a single “C” change order. BellSouth uses a single C order to effect a
5 change from a BellSouth retail service to resold service. This option, however,
6 would not work when converting from retail service or resale service to UNE-P.
7 In a resale environment, the same line class codes are used and the billing is the
8 same as in the retail environment with the exception that the wholesale discount
9 applies to certain services. BellSouth, therefore, uses the same USOCs in both the
10 retail and the resale environments. The rates for UNE-P, however, are entirely
11 different from the rates for resale service. Thus, the USOCs for UNE-P are
12 different from the USOCs for retail service or resale service. Additionally, the
13 line class codes for UNE-P are often different from the line class codes for retail
14 service or resale service. Unlike an order to convert from retail service to resale
15 service, therefore, an order to convert from either retail service or resale service to
16 UNE-P involves removing the existing retail or resale USOCs and replacing them
17 with appropriate UNE-P USOCs. Current service order standards and existing
18 logic in the service order systems will not allow the processing of different
19 USOCs on a single service order. Use of a single C order, therefore, was
20 determined not to be a viable solution.

21
22 • Issue a D order and an N order. Under this alternative, a disconnect (“D”) order is
23 issued to generate a final retail or resale bill and to stop retail or resale billing on a
24 going-forward basis. An N order also is issued to create the appropriate line class

1 codes and USOCs necessary to provide and bill for UNE-P.³

2

3 Q. WHICH OF THESE ALTERNATIVES DID THE UNE-P PROJECT TEAM DECIDE
4 TO IMPLEMENT?

5

6 A. The UNE-P team decided to implement the issuance of a disconnect and a new connect
7 order. This process is generally referred to as the “D&N” process.

8

9 Q. HAD THIS ALTERNATIVE BEEN USED BY BELL SOUTH BEFORE THE UNE-P
10 TEAM DECIDED ON IT?

11

12 A. Yes, before the FCC issued its UNE Remand Order, BellSouth provided combinations
13 similar to the UNE-P to ALECs pursuant to contractual professional service
14 arrangements. As Ms. Shiroishi notes in her testimony, IDS had signed such an
15 arrangement with BellSouth prior to the issuance of the UNE Remand Order. While
16 employed by BellSouth, Ms. Wellman wrote the original M&Ps for these combinations,
17 and those M&Ps called for the use of the “D&N” process to convert from retail service or
18 resale service to combinations similar to the UNE-P. In February, 2000, Ms. Wellman
19 updated the combination M&Ps that applied to Residence and Business applications to
20 bring these M&Ps into compliance with the provisions of the UNE Remand Order. The
21 updated M&Ps also called for the use of the “D&N” process.

22

³ Even if the end user has the same services after the conversion as the end user had before the conversion, line class code changes and USOC changes are necessary to effect the appropriate UNE-P billing.

1 Q. WHEN THE UNE-P TEAM DECIDED TO IMPLEMENT THE D&N PROCESS, WAS
2 IT AWARE THAT THIS D&N PROCESS HAD PREVIOUSLY BEEN USED TO
3 CONVERT RETAIL AND RESALE SERVICES TO COMBINATIONS?
4

5 A. Yes. The team knew that the D&N process had been used successfully to convert from
6 retail or resale services to combinations. In fact, service outages had occurred on less
7 than 1% of such conversions. After the process was used to convert a significant number
8 of retail or resale accounts to combinations for a particular ALEC, the product manager at
9 that time, Bill Gulas, hosted a "celebration" and gave the team members awards for a job
10 well-done. Mr. Gulas' action reinforced my team's decision to utilize the existing D&N
11 processes to effect the conversions.
12

13 Q. WERE MR. GULAS AND MS. WELLMAN INVOLVED IN THE UNE-P PROJECT
14 TEAM'S DECISION TO IMPLEMENT THE D&N PROCESS?
15

16 A. Yes, they were.
17

18 Q. DID MR. GULAS OR MS. WELLMAN EVER VOICE ANY CONCERNS TO YOU
19 ABOUT USING THE D&N PROCESS?
20

21 A. No. As Project Manager of the team, I would think that if they had any concerns about
22 the decision, they would have shared them with me. However, I do not recall Mr. Gulas,
23 Ms. Wellman, or any other member of the team ever informing me of any concerns with
24 this decision.
25

1 Q. AFTER DECIDING ON THE D&N SOLUTION, DID THE PROJECT TEAM TEST
2 THIS SOLUTION BEFORE IT WAS IMPLEMENTED?

3

4 A. Yes. The team conducted extensive end-to-end testing, and no end user outages occurred.

5

6 Q. WAS THE UNE-P PROJECT TEAM AWARE OF ANY RISKS ASSOCIATED WITH
7 USING THE D&N SOLUTION?

8

9 A. Yes. Based on BellSouth's earlier experience with conversions to network combinations,
10 the team was aware that if the D orders and the N orders were not worked in a
11 coordinated fashion, service outages could occur. If, for instance, the D order was
12 worked and the N order was not, the end user would experience a service outage. Also, if
13 the same physical facilities that had been used to provide the retail or resale services were
14 not reused to fulfill the N order, the end user would experience a service outage.

15

16 Q. DID THE UNE-P PROJECT TEAM DO ANYTHING TO ADDRESS THESE RISKS?

17

18 A. Yes. We incorporated into the M&Ps a requirement that a "reuse" code be placed on both
19 the N and the D order. This reuse code serves two purposes. First, the reuse code on the
20 N order is associated with the reuse code on the D order – thus one order should not be
21 worked unless the corresponding order is also ready to be worked. Additionally, the
22 reuse code indicates that the same facilities that had been used to provide the services that
23 are the subject of the D order should be used to fill the N order.

24

25

1 Q. DID THE TEAM MAKE ANY RECOMMENDATIONS REGARDING THE UNE-P
2 CONVERSION PROCESS ON A GOING-FORWARD BASIS?

3

4 A. Yes. The team recommended evaluation and consideration of the development of a
5 process that would support a single order to effect the conversion. It is my understanding
6 that BellSouth has plans to implement such a process in 2002.

7

8 Q. HAS THE UNE-P TEAM EVALUATED THE EFFECTIVENESS OF THE D&N
9 PROCESS SINCE IT HAS BEEN IMPLEMENTED?

10

11 A. Yes. The UNE-P team has reviewed the process and has periodically revised the process
12 to improve the quality of the product and to eliminate any service disruption during
13 conversion to UNE-P. For example, additional service order edits have been put in place
14 to ensure that the D&N orders are kept together during any manual handling that may
15 take place. BellSouth has implemented processes to ensure that voice mailboxes are not
16 disconnected when a retail or resale account with BellSouth MemoryCall® Service is
17 converted to a UNE-P account with MemoryCall® Service. We also have implemented
18 additional measures to ensure that the D order is not worked without the corresponding N
19 order.

20

21 Q. DOES A SITUATION SIMILAR TO THE D&N OCCUR WITH BELLSOUTH'S
22 RETAIL CUSTOMERS?

23

24 A. It depends. When BellSouth establishes new service for a customer, there is no
25 corresponding service to disconnect and, therefore, there is no D&N process – instead,

1 there is simply an N process to fill the new order. If, however, a retail customer changes
2 from a regular business line to BellSouth Centrex Service, for example, it is my
3 understanding that multiple orders are required. At least one order is required to
4 disconnect the existing service. At least one other order is required to connect the new
5 service because the USOCs for regular business lines are different from the USOCs for
6 Centrex Service. These orders must be coordinated in order to avoid a service outage.

7
8 Q. PLEASE DISCUSS THE CONVERSION PROCESS WHEN IT INVOLVES VOICE
9 MAIL SERVICE OR MEMORYCALL[®] SERVICE.

10
11 A. As explained in the documentation that BellSouth provides to ALECs via BellSouth's
12 Interconnection Website at <http://www.interconnection.bellsouth.com/>, voice mail service
13 is not a telecommunications service and, therefore, it is not available on a UNE-P line.
14 Therefore, if a retail or resale end user who has voice mail service is converted to a UNE-
15 P, the voice mail service will not be converted.

16
17 Upon conversion to UNE-P, however, the end user can switch from voice mail service
18 (which is not available with UNE-P) to certain types of MemoryCall[®] Service (which are
19 available with UNE-P). These are two different services and therefore require system
20 changes.

21
22 For instance, if a BellSouth retail customer switched from voice mail service to
23 MemoryCall[®] Service, that customer's voice mail service would be disconnected and the
24 customer would lose any voice mail messages upon that disconnection. Similarly, if a
25 retail or resale end user with voice mail service is converted to a UNE-P arrangement

1 with MemoryCall® Service, the end user's voice mail service is disconnected and the end
2 user will lose any voice mail messages upon that disconnection.

3
4 Certain types of MemoryCall® Service are available with UNE-P and are identified in the
5 documentation that BellSouth provides to ALECs via BellSouth's Interconnection
6 Website at <http://www.interconnection.bellsouth.com/products/html/unes.html>. The
7 UNE-P Project Team, along with BellSouth's Enhanced MemoryCall® Service Center,
8 developed and tested processes aimed at preventing MemoryCall® Service mailboxes
9 from being disconnected when converting from retail or resale service to UNE-P and
10 retaining MemoryCall® Service. Ms. Wellman incorporated these processes into the
11 M&Ps used by the Local Carrier Service Center ("LCSC").

12
13 Q. ARE THESE SAME PROCESSES IN EFFECT TODAY FOR MEMORYCALL®
14 SERVICE ORDERING?

15
16 A. These same processes are in effect. Initially, however, information regarding these
17 processes were not correctly captured in the M&Ps. The M&Ps have been updated, and
18 the electronic ordering procedures have been changed to correct any deficiencies. The
19 processes, when properly followed, work correctly and efficiently.

20
21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

22
23 A. Yes.

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