

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 PANEL REBUTTAL TESTIMONY OF  
3 JERRY L. WILSON, PATTIE KNIGHT, PAT RAND AND JIMMY PATRICK  
4 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
5 DOCKET NO. 010740-TP  
6 AUGUST 27, 2001  
7  
8

9 Q. MR. WILSON, PLEASE STATE YOUR NAME, YOUR POSITION WITH  
10 BELL SOUTH TELECOMMUNICATIONS, INC. ("BELL SOUTH") AND YOUR  
11 ADDRESS.  
12

13 A. My name is Jerry L. Wilson. I am employed by BellSouth as Senior Director,  
14 Interconnection Services. In this position, I handle certain issues related to  
15 local interconnection matters, primarily operations support systems ("OSS").  
16 My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.  
17

18 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS ARBITRATION?  
19

20 A. Yes. I filed direct testimony in this case on August 20, 2001.  
21

22 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?  
23  
24  
25

1 A. The purpose of my testimony is to rebut certain statements in the direct  
2 testimony of Mr. Keith Kramer and Ms. Becky Wellman as they relate to OSS  
3 issues.

4  
5 Q. MS. KNIGHT, PLEASE STATE YOUR NAME, ADDRESS AND POSITION AT  
6 BELLSOUTH.

7  
8 A. My name is Pattie Knight. I am employed by BellSouth as a Customer  
9 Support Manager. My address is 600 N. 19<sup>th</sup> Street, Birmingham, Alabama  
10 35203.

11  
12 Q. MS. KNIGHT, WERE YOU INVOLVED IN ANY OF THE INCIDENTS  
13 ALLEGED IN THE COMPLAINT IDS FILED IN THIS DOCKET OR IN ANY OF  
14 THE INCIDENTS REFERENCED IN THE PREFILED TESTIMONY OF IDS'  
15 WITNESS KEITH KRAMER?

16  
17 A. Yes. In my position as a Customer Support Manager, I was assigned to  
18 support IDS. Specifically, I was involved with those incidences referenced in  
19 Mr. Kramer's testimony on pages 10 and 11.

20  
21 Q. MR. PATRICK, PLEASE STATE YOUR NAME, ADDRESS AND POSITION  
22 AT BELLSOUTH.

23  
24 A. My name is Jimmy Patrick. I am employed by BellSouth as Sales Director –  
25 OSS. My address is 600 N. 19<sup>th</sup> Street, Birmingham, Alabama 35203.

1 Q. MR. PATRICK, WERE YOU INVOLVED IN ANY OF THE INCIDENTS  
2 ALLEGED IN THE COMPLAINT IDS FILED IN THIS DOCKET OR IN ANY OF  
3 THE INCIDENTS REFERENCED IN THE PREFILED TESTIMONY OF IDS'  
4 WITNESS KEITH KRAMER?

5  
6 A. Yes. I was involved in incidents referenced by Mr. Kramer on pages 11 and  
7 33. At that time, I was employed by BellSouth as a contract employee,  
8 providing support to ALECs in obtaining access to BellSouth's electronic  
9 interfaces and databases.

10  
11 Q. MS. RAND, PLEASE STATE YOUR NAME, ADDRESS AND POSITION AT  
12 BELL SOUTH.

13  
14 A. My name is Pat Rand. I am employed by BellSouth as Manager in  
15 Interconnection Sales. My Address is 600 N. 19<sup>th</sup> Street, Birmingham,  
16 Alabama 35203.

17  
18 Q. MS. RAND, WERE YOU INVOLVED IN ANY OF THE INCIDENTS ALLEGED  
19 IN THE COMPLAINT IDS FILED IN THIS DOCKET OR IN ANY OF THE  
20 INCIDENTS REFERENCED IN THE PREFILED TESTIMONY OF IDS'  
21 WITNESS KEITH KRAMER?

22  
23 A. Yes. I was involved in the incidents referenced by Mr. Kramer on pages 10  
24 and 11 of his direct testimony. At the time, I was providing sales support on a  
25 variety of ALEC activities.

1 Q. MR. WILSON, DO YOU HAVE ANY OVERALL OBSERVATIONS  
2 CONCERNING THE OSS RELATED ISSUES THAT HAVE BEEN RAISED  
3 BY IDS IN THIS COMPLAINT PROCEEDING?  
4

5 A. Yes. To the extent that IDS is questioning the adequacy of BellSouth's OSS,  
6 that is the issue presently being evaluated by extensive third-party testing of  
7 BellSouth's OSS in Florida FPSC Docket No. 960786-TP. In fact, the  
8 Commission has issued orders in that docket in which it found that (1) third-  
9 party testing will provide "better, more accurate information about the status of  
10 BellSouth's systems than might be obtained through further administrative  
11 proceedings on this issue"; and (2) third-party testing was being "conducted in  
12 lieu of addressing our concerns through the hearing process." Order No.  
13 PSC-99-1568-PAA at 10; Order No. PSC-01-1025-PCO-TL at 5 (citing Order  
14 No. 00-0104-PAA-TP at 5). As succinctly stated by the Commission, "if  
15 BellSouth's OSS systems pass the third-party testing in Florida, then  
16 BellSouth shall be considered to have remedied the OSS concerns that we  
17 identified in Order No. PSC-97-1459-FOF-TL." Order No. PSC -99-1568 PAA-  
18 TP at 9-10.  
19

20 It would be inappropriate to preempt the Commission's ongoing investigation  
21 of BellSouth's OSS based on a debate of the isolated past instances of OSS  
22 related problems alleged by IDS in this complaint or based on IDS' unfounded,  
23 sweeping characterizations of BellSouth's OSS. Also, I am particularly  
24 opposed to any attempt by IDS in this proceeding to redefine BellSouth's  
25 requirements for meeting the test of providing nondiscriminatory access to its

1 OSS. In the event that the Commission decides to address these OSS issues  
2 in this complaint proceeding, however, this Panel will demonstrate that  
3 BellSouth provides nondiscriminatory access to its OSS as required by the  
4 Telecommunications Act of 1996.

5  
6 **I. REBUTTAL OF IDS' TESTIMONY REGARDING EDI**

7  
8 Q. MR. WILSON, WHAT IS EDI?

9  
10 A. As I explained in more detail in my direct testimony (page 8, for example), EDI  
11 stands for Electronic Data Interchange, and it is a machine-to-machine  
12 interface that allows ALECs like IDS to perform ordering functions  
13 electronically.

14  
15 Q. MR. PATRICK, PLEASE COMMENT ON MR. KRAMER'S STATEMENT ON  
16 PAGE 9 OF HIS TESTIMONY THAT IDS HAD ITS EMPLOYEES TRAINED  
17 ON EDI "IN OR ABOUT AUGUST OF 1999."

18  
19 A. BellSouth has no record that suggests that IDS representatives received EDI  
20 training from BellSouth in August of 1999. According to our records, BellSouth  
21 provided EDI training to IDS representatives on December 2, 1997, January  
22 13, 1998, and February 18, 1999.

23  
24 Q. MS. KNIGHT, ON PAGE 10 OF HIS DIRECT TESTIMONY, MR. KRAMER  
25 REFERENCES SERVICE OUTAGES INVOLVING TWO IDS EMPLOYEES

1 WHOSE ACCOUNTS APPARENTLY WERE USED BY IDS TO ATTEMPT A  
2 CONVERSION FROM RESALE TO UNE-P. ARE YOU AWARE OF THIS  
3 INCIDENT?  
4

5 A. No. I have no recollection of any conversations or correspondence with  
6 anyone from IDS involving such an incident. It is my understanding that  
7 BellSouth has asked IDS for more specific information about this incident, but  
8 as of today, IDS has not provided that information.  
9

10 Q. MS. KNIGHT, ON PAGES 10 - 11 OF HIS TESTIMONY MR. KRAMER  
11 DISCUSSES TRAINING THAT BELLSOUTH PROVIDED IDS' EMPLOYEES.  
12 DO YOU AGREE WITH MR. KRAMER'S DISCUSSION OF THAT TRAINING?  
13

14 A. No. Dottie Amerson, Pat Rand, and I traveled to IDS' offices in Miami,  
15 Florida in February 2000 to provide training to IDS' employees, but I do not  
16 agree with Mr. Kramer's statements of what led to that training or with his  
17 statements about what happened during that training.  
18

19 Q. MS. KNIGHT, WHAT LED TO YOUR TRAVELING TO FLORIDA TO  
20 PROVIDE THIS TRAINING TO IDS?  
21

22 A. At that time, I performed a monthly analysis of local service requests  
23 submitted by IDS and by other ALECs to which I was assigned. I performed  
24 this analysis in order to determine whether it appeared that either BellSouth or  
25 the ALEC needed to do anything differently in order to improve local service

1 order flow through. Based on my analysis of IDS' service orders over several  
2 months, it appeared to me that the IDS employees submitting such orders  
3 would benefit from additional basic service order training. In late 1999 or early  
4 2000, Mr. Kramer asked me if BellSouth could provide training to his  
5 employees regarding network combinations and EDI, and I suggested that this  
6 training be expanded to include basic service order training as well. Mr.  
7 Kramer agreed, and we scheduled the training for February 2000. My  
8 traveling to Florida with Ms. Anderson and Ms. Rand, therefore, was not  
9 related to any alleged service outages involving IDS' employees, as suggested  
10 by Mr. Kramer.

11  
12 Q. MS. KNIGHT, DID YOU "RECOMMEND THAT BELLSOUTH COULD  
13 PROVIDE THIS ADDITIONAL TRAINING ON-SITE FOR \$8,000" AS MR.  
14 KRAMER SUGGESTS ON PAGES 10 AND 11 OF HIS TESTIMONY?

15  
16 A. No. I am not familiar with this \$8,000 figure, and I do not recall conveying  
17 such a figure to IDS. In fact, I do not recall talking to Mr. Kramer or anyone  
18 else about the charges for training. Typically, I would direct any inquiries  
19 about the costs of such training to BellSouth's Professional Services group.

20  
21 Q. MS. KNIGHT, HOW DID YOU GO ABOUT PREPARING FOR THIS  
22 TRAINING SESSION?

23  
24 A. First, I asked IDS for a list of accounts they planned on converting to UNE-Ps.  
25 When I received this list, I used it to pull the Customer Service Records of

1 those accounts so that we could effectively train IDS using "real-world"  
2 examples. I then contacted Dottie Amerson, who conducts training for ALECs  
3 at BellSouth's request on a contract basis. I worked with her over the course  
4 of three days in late January and provided her the assistance she needed to  
5 create a customized basic service order and network combination training  
6 program to deliver to IDS. I then coordinated with Pat Rand, the subject  
7 matter expert on EDI, to deliver EDI related training at the same time.

8  
9 Q. MS. KNIGHT, WHAT HAPPENED DURING THE FEBRUARY 2000  
10 TRAINING OF IDS' EMPLOYEES IN MIAMI?

11  
12 A. Dottie Amerson trained about 16 to 18 of IDS' employees on basic service  
13 orders and network combinations over a two-day period. On the second of  
14 these two days, Pat Rand trained two of IDS' employees on EDI. I was in the  
15 classrooms providing any assistance I could.

16  
17 Q. MS. KNIGHT, DID THE IDS EMPLOYEES IN MS. AMERSON'S CLASS  
18 COMPLAIN THAT THEY ALREADY KNEW WHAT WAS BEING TAUGHT, AS  
19 MR. KRAMER ALLEGES ON PAGE 11 OF HIS TESTIMONY?

20  
21 A. No. We received complimentary feedback from these IDS employees, and  
22 none of the feedback suggested that the material was a "re-hash of what had  
23 already been learned" as Mr. Kramer suggests. Nor did any of these IDS  
24 employees say anything like this to me when I was going from person to  
25 person within the class to provide assistance.



1 Q. MS. KNIGHT, AT ANY TIME DURING THIS TRAINING, DID MR. KRAMER  
2 ASK YOU TO PROCESS AN ORDER THROUGH EDI "SO THAT WE COULD  
3 SEE FIRST HAND WHAT IDS WAS DOING INCORRECTLY" AS HE STATES  
4 ON PAGE 11 OF HIS TESTIMONY?

5

6 A. No. Neither Mr. Kramer nor anyone else asked me to process an order  
7 through EDI.

8

9 Q. MS. RAND, COULD YOU TELL US ABOUT THE TRAINING YOU PROVIDED  
10 TO IDS' EMPLOYEES?

11

12 A. Yes. IDS only had one available personal computer that had the  
13 TrustedLink™ (EDI-PC) software package installed, so I sat at the desk of  
14 IDS' employee Brad Hamilton and covered him on the TrustedLink™ (EDI-PC)  
15 customized training package. While we were working at the computer,  
16 another IDS employee was also in the room watching us. Mr. Hamilton was  
17 constantly being interrupted, and he did not appear to be particularly focused  
18 on the training coverage I was trying to provide.

19

20 Q. MS. RAND, DID MR. HAMILTON SUGGEST THAT HE ALREADY KNEW  
21 HOW TO USE EDI?

22

23 A. Yes. He told me that he was familiar with the package and that he knew how  
24 to input orders using the TrustedLink™ (EDI-PC) customized training package.

25

1 Q. MS. RAND, AT ANY TIME DURING THIS TRAINING, DID MR. KRAMER ASK  
2 YOU TO PROCESS AN ORDER THROUGH EDI "SO THAT WE COULD SEE  
3 FIRST HAND WHAT IDS WAS DOING INCORRECTLY" AS HE STATES ON  
4 PAGE 11 OF HIS TESTIMONY?

5

6 A. No. Neither Mr. Kramer nor anyone else asked me to process an order  
7 through EDI.

8

9 Q. MS. RAND, DID MR. HAMILTON, WHO YOU WERE TRAINING, ASK ANY  
10 SPECIFIC QUESTIONS ABOUT EDI DURING THE TRAINING?

11

12 A. Yes. Mr. Hamilton asked me about the local service freeze. When I asked him if he  
13 had checked the BellSouth Business Rules documentation regarding local service  
14 freeze, he said that he had not. I explained where this documentation was available  
15 to him on the website, I gave him a paper copy of the documentation that I had  
16 brought with me to the training, and I showed him where the information regarding  
17 local service freeze was located in this documentation.

18

19 Q. MS. RAND, WHAT HAPPENED AFTER YOU HAD FINISHED THIS  
20 TRAINING?

21

22 A. I asked Mr. Hamilton if I had answered his questions and if I had met his  
23 expectations. He told me that I had, and we ended the training.

24

25 Q. MS. RAND, HOW LONG DID YOUR TRAINING OF MR. HAMILTON LAST?

1 A. Only about an hour and a half, which is all the time Mr. Hamilton had that day.

2

3 Q. MS. RAND, ON PAGE 11 OF HIS DIRECT TESTIMONY, MR. KRAMER  
4 STATES "MS. RAND PULLED ME ASIDE AND TOLD ME THAT THE  
5 PROBLEM WAS WITH BELLSOUTH'S EDI AND NOT WITH THE WAY IDS  
6 WAS PROCESSING THE ORDERS. FURTHERMORE, MS. RAND STATED  
7 THAT EDI WAS NOT SUPPORTING PORT/LOOP COMBINATIONS AND WE  
8 SHOULD CONSIDER THE TELECOMMUNICATION ACCESS GATEWAY  
9 ("TAG") AS A MORE EFFECTIVE SOLUTION TO THE ORDER  
10 PROCESSING PROBLEMS." COULD YOU COMMENT ON THESE  
11 STATEMENTS?

12

13 A. I did not have a conversation with Mr. Kramer. I did not pull him aside, and I  
14 did not recommend anything to him. I did not state that EDI was not  
15 supporting port/loop combinations. I did not ask IDS to consider TAG.

16

17 Q. MS. KNIGHT, DID MR. HAMILTON SAY ANYTHING TO YOU DURING THIS  
18 TRAINING?

19

20 A. Yes. Mr. Hamilton told me that IDS had decided to begin using either  
21 RoboTAG™ or TAG to process orders. This surprised me, given that we had  
22 been asked to come to Miami to provide training specifically on EDI.

23

24

25

1 **II. REBUTTAL OF IDS' TESTIMONY REGARDING TAG**

2  
3 Q MR. PATRICK, PLEASE COMMENT ON MR. KRAMER'S STATEMENT, ON  
4 PAGE 12 OF HIS TESTIMONY, THAT IDS ORDERED TAG IN JANUARY OF  
5 2000.

6  
7 A. TAG stands for Telecommunications Access Gateway, and as Mr. Wilson  
8 explained in more detail in his direct testimony (page 8, for example), TAG is a  
9 machine-to-machine interface that allows ALECs like IDS to perform pre-  
10 ordering and ordering functions electronically. In order to use TAG, ALECs  
11 like IDS must install a software application on their side of the interface so that  
12 the equipment the ALEC uses to place orders can communicate with TAG.  
13 ALECs can purchase and install BellSouth's version of such software (which is  
14 called RoboTAG) or they can purchase and install such software that is  
15 offered by one of several vendors. As Mr. Kramer notes on page 11 of his  
16 testimony, IDS chose to purchase the version of such software offered by  
17 MANTISS.

18  
19 Q MR. PATRICK, DID IDS EVER ASK YOU ABOUT TAG?

20  
21 A. Yes. Sometime in early 2000, Brad Hamilton of IDS approached me and  
22 asked if there were any alternatives to EDI, and I told Mr. Hamilton about TAG  
23 and RoboTAG™.

1 Q. MR. PATRICK, DID YOU RECOMMEND THAT IDS USE EITHER TAG OR  
2 ROBOTAG?

3

4 A. No. Mr. Hamilton asked me about TAG, and I informed him that TAG was  
5 another interface option to EDI and that BellSouth also offered RoboTAG. I  
6 also informed him that IDS could purchase the necessary software  
7 applications I discussed above from a third-party vendor. I did not recommend  
8 that IDS use or not use TAG.

9

10 Q. MS. RAND, DID YOU EVER STATE THAT IDS SHOULD CONSIDER TAG  
11 "AS A MORE EFFECTIVE SOLUTION TO THE ORDER PROCESSING  
12 PROBLEMS" AS MR. KRAMER ALLEGES ON PAGE 11 OF HIS DIRECT  
13 TESTIMONY?

14

15 A. No. I never made such a statement.

16

17 Q. MR. PATRICK, DID IDS EVENTUALLY BEGIN USING TAG?

18

19 A. Yes.

20

21 Q. MR. PATRICK, ONCE IDS INSTALLED THE NECESSARY SOFTWARE  
22 APPLICATION, WHAT ELSE WAS NEEDED IN ORDER FOR IDS TO BEGIN  
23 USING TAG?

24

1 A. BellSouth and IDS had to jointly conduct connectivity testing, application  
2 testing, and validity testing. The connectivity testing is designed to determine  
3 whether the trunks connecting BellSouth's TAG gateway to IDS' software  
4 application are working properly. Application testing is designed to determine  
5 whether the software application installed by IDS is working properly with  
6 BellSouth's TAG interface. Validity testing is designed to determine whether  
7 various types of orders submitted through TAG are processed properly.  
8

9 Q. MR. PATRICK, DID IDS CONTACT BELLSOUTH ABOUT CONDUCTING  
10 THESE TESTS?  
11

12 A. Yes, it did. IDS sent BellSouth a Letter of Authorization (LOA) dated February  
13 17, 2000. This letter authorized BellSouth to work with MANTISS to conduct  
14 these tests on the MANTISS software IDS had installed. As I noted earlier,  
15 MANTISS is the company that made the software application IDS was using to  
16 access TAG.  
17

18 Q. MR. PATRICK, PLEASE COMMENT ON MR. KRAMER'S STATEMENT, ON  
19 PAGE 12 OF HIS TESTIMONY, THAT "IN JANUARY OF 2000, IDS  
20 ORDERED TAG."  
21

22 A. I do not know the date that IDS purchased the software application from  
23 MANTISS. As I noted above, however, the LOA BellSouth received was dated  
24 February 17, 2000. Prior to receiving this LOA, BellSouth could not begin  
25 conducting these tests.

1 Q. MR. PATRICK, WHAT HAPPENED AFTER BELLSOUTH RECEIVED THIS  
2 LOA?

3

4 A. Shortly after I received this LOA, I checked with the Test Manager for the  
5 Interconnection Operations Group to determine when this testing could begin  
6 and to determine the estimated time it would take to complete the testing. I do  
7 not remember the dates I was provided, but I do remember that when I shared  
8 these dates with Mr. Kramer, he stated that the dates were not acceptable and  
9 he stated that he would complain to the Florida and Georgia Commissions if  
10 the testing could not be scheduled earlier.

11

12 Q. MR. PATRICK, DID MR. KRAMER'S STATEMENTS ABOUT FILING A  
13 COMPLAINT WITH STATE COMMISSIONS AFFECT WHAT YOU DID  
14 NEXT?

15

16 A. No. When Mr. Kramer told me that he was not happy with the dates I had  
17 suggested, I was willing to try to get earlier dates and I would have tried to do  
18 so even if he had not made these statements. And that is exactly what I did. I  
19 scheduled a conference call with representatives of BellSouth and IDS to  
20 discuss mutually agreeable testing dates. During the call, BellSouth and IDS  
21 agreed that the tests would begin on March 15, 2000 and that the tests would  
22 be completed by April 16, 2000. IDS signed a testing agreement that  
23 incorporated these dates.

24

1 Q. MR. PATRICK, DID BELLSOUTH COMPLETE THE TEST ON TIME?

2

3 A. Yes. In fact, the tests were complete on April 6, 2000, which is 10 days earlier  
4 than the date set forth in the testing agreement.

5

6 Q. MR. PATRICK, PLEASE RESPOND TO MR. KRAMER'S STATEMENT, ON  
7 PAGE 33 OF HIS TESTIMONY, THAT EDI WAS NEVER SET UP FOR  
8 PORT-LOOP CONVERSIONS.

9

10 A. I know of at least three ALECs that are currently using EDI to convert lines  
11 from resale to UNE-P.

12

13 Q. MR. WILSON, CAN YOU COMMENT ON MR. KRAMER'S STATEMENT ON  
14 PAGE 26 OF HIS TESTIMONY RELATING TO MULTI-LINE BUSINESS  
15 CUSTOMERS IN WHICH HE STATES "90% OF THESE LINES HAVE SOME  
16 FEATURE SUCH AS 'HUNT AND ROLLOVER,' VOICE MAIL, REMOTE  
17 CALL FORWARDING, OR SOME OTHER FEATURE THAT CAUSES THE  
18 ORDER TO DROP OUT OF BELLSOUTH'S AUTOMATED SYSYEM AND  
19 INTO A MANUAL HANDLING SYSTEM"?

20

21 A. Yes. First, I would note that Mr. Kramer provided no specific information that  
22 would allow a detailed review of the alleged drop out on certain multi-line  
23 business customers.

24

25



1 Second, although IDS did not provide specific information that would allow a  
2 detailed review, I have reviewed UNE-P service request volumes for IDS over  
3 a recent three (3) month period (May, June and July 2001). This review  
4 revealed that:

- 5
- 6 • Almost all of IDS's UNE-P orders were submitted electronically.
- 7 • Flow-through for these orders was just over 70%. BellSouth's data  
8 therefore, contradicts Mr. Kramer's assertions of a 90% fallout rate.
- 9

10 Q. MR. WILSON, WOULD YOU COMMENT ON MR. KRAMER'S ALLEGATION,  
11 ON PAGE 29 AND AGAIN ON PAGE 65 OF HIS TESTIMONY, THAT  
12 BELL SOUTH WAS NOT UPDATING LENS IN A TIMELY FASHION?

13

14 A. Yes. Mr. Kramer appears to be describing delays in the updating of  
15 BellSouth's Customer Service Records ("CSR") rather than in the updating of  
16 LENS. LENS is the interface to BellSouth's CSRs, and it reflects the most  
17 current posted information. In most instances, the CSR itself is updated within  
18 24 to 48 hours of an order being posted error-free to the Customer Record  
19 Information System ("CRIS"). There may be an isolated event that would  
20 delay order(s) posting to CRIS which would result in a delay in posting of  
21 information viewed by LENS, but I am not aware of any long-term or systemic  
22 delays in the posting of such orders to CRIS.

23

24 Q. MR. WILSON, PLEASE COMMENT ON MR. KRAMER'S STATEMENT ON  
25 PAGE 33 OF HIS TESTIMONY, THAT "IDS DISCOVERED THAT

1 BELLSOUTH WAS OFFERING UNE-P AND WAS COMPLETING  
2 PORT/LOOP CONVERSIONS FOR TWO OTHER CARRIERS WHILE  
3 REFUSING TO DO THE CONVERSIONS WITH IDS.”  
4

5 A. BellSouth did not refuse to allow IDS to issue UNE-P conversion Local Service  
6 Requests (“LSRs”) as alleged by Mr. Kramer. IDS and BellSouth executed an  
7 Interconnection Agreement on March 27, 2000 that enabled IDS to  
8 immediately begin ordering port/loop conversions. BellSouth records indicate  
9 that during the month of April 2000, IDS submitted numerous UNE-P service  
10 requests. Therefore, Mr. Kramer is wrong to suggest that BellSouth refused to  
11 accept and perform conversions from IDS. During this period, other ALECs,  
12 with Interconnection Agreements in place, were also issuing UNE-P  
13 conversion LSRs.  
14

15 Q. MR. WILSON, IS MR. KRAMER CORRECT WHEN HE STATED, ON PAGE  
16 33, THAT “EDI WAS NEVER SET-UP FOR PORT-LOOP CONVERSIONS”?  
17

18 A. Absolutely not. As stated in my direct testimony, the UNE-P first became  
19 available with flow-through in Kentucky in March 1998. In February 1999,  
20 BellSouth implemented UNE-P with electronic ordering and flow-through for all  
21 ALECs in all states, including Florida. ALECs can use EDI, TAG, or LENS to  
22 order UNE-P.  
23

1 Q. MR. WILSON, ALTHOUGH UNE-P CONVERSION ORDERS GENERALLY  
 2 ARE CAPABLE OF FLOW-THROUGH, ARE ALL ALEC SERVICE  
 3 REQUESTS CAPABLE OF FLOW THROUGH?  
 4

5 A. No. LSRs for certain complex resale services and UNEs may be ordered  
 6 electronically via EDI or TAG, but such orders are designed to fall out for  
 7 manual handling. In order to enable ALECs to submit some complex LSRs  
 8 electronically, rather than by fax, BellSouth designed the EDI and TAG  
 9 ordering interface to accept LSRs for these services. After these LSRs are  
 10 transmitted to BellSouth electronically, they are handled as if they had been  
 11 faxed to the LCSC. The chart below lists the services and UNEs for which  
 12 ALECs may transmit electronic service orders that fall out for manual handling:

<b>Resale Services &amp; UNEs transmitted electronically, manually handled</b>	<b>EDI</b>	<b>TAG</b>
<b>UNE</b>		
LNP with Complex Listing	X	X
LNP with partial migration	X	X
INP to LNP conversions	X	X
Loop-port PBX	X	X
Unbundled 2-wire analog port	X	X
<b>Resale</b>		
Basic Rate ISDN	X	X
DiD with PBX (switch as is)	X	X
DiD (switch as is)	X	X
Directory Listing Indentations	X	X
Directory Listings Captions	X	X
Hunting MLH	X	X
PBX standalone (add, change, delete)	X	X
PBX trunks	X	X
Synchronet	X	X

13 In addition, LSRs that include more than 25 lines will fall out for manual  
 14 handling, and this also occurs when BellSouth retail operations submits a  
 15 service request for more than 25 lines. Further, LSRs with populated project

1 or Related Purchase Order Number fields, LSRs for which there are already  
2 pending service orders, LSRs expedited by the ALEC, and LSRs for special  
3 pricing plans for the specific ALEC will also fall out for manual handling by  
4 design.

5  
6 LSRs that fallout for manual handling are those that currently cannot be  
7 programmed for flow-through for technical reasons, such as complex services.  
8 These practical problems impact BellSouth's retail flow through as well. The  
9 decision-making criteria used by BellSouth to determine what types of services  
10 can flow-through are the result of logical business decisions, within a very  
11 narrow list of categories. In making these decisions, BellSouth has ensured  
12 that processing of service requests is done substantially in the same manner,  
13 whether LSRs for ALECs, or service requests for BellSouth retail units. The  
14 same types of requests flow through, or fall out for manual handling, for both  
15 ALECs and BellSouth retail.

16  
17 Q. MR. WILSON, ON PAGE 7 OF HER TESTIMONY, AND REFERENCED ON  
18 PAGE 65 OF MR. KRAMER'S TESTIMONY, MS. WELLMAN OFFERS HER  
19 DEFINITION OF "PARITY" IN RELATION TO BELLSOUTH'S OBLIGATION  
20 TO PROVIDE OSS TO IDS. DO YOU AGREE WITH HER?

21  
22 A. No. Ms. Wellman misuses the notion of parity to describe BellSouth's  
23 obligation under the Telecommunications Act of 1996 and the related FCC  
24 Rules to provide nondiscriminatory access to OSS. Further, using Ms.  
25 Wellman's lay person definition of parity; that is, equivalent in all respects, one

1 might conclude that the only way to satisfy her requirements would be to  
2 provide direct access to identical OSS. This is simply not the standard that  
3 Congress and the FCC have developed for the provision of nondiscriminatory  
4 access to OSS and in fact would not, if implemented, meet the business needs  
5 of IDS or other ALECs.

6  
7 The Florida Commission has previously considered arguments of this nature  
8 and concluded that direct access to OSS used by BellSouth's retail operations  
9 is not necessary. (Florida Docket No. 980119-TP, Order No. PSC-98-1001-  
10 FOF-TP, ¶4.)

11  
12 Q. MR. WILSON, PLEASE COMMENT ON MS. WELLMAN'S CONCLUSION,  
13 ON PAGES 8 THROUGH 11 OF HER TESTIMONY, THAT BELLSOUTH'S  
14 PROVISION OF OSS TO IDS IS INADEQUATE AS COMPARED TO THE  
15 OSS USED BY BELLSOUTH IN ITS RETAIL OPERATIONS. (SEE ALSO  
16 KRAMER, PAGE 65 AND 66).

17  
18 A. Although Ms. Wellman worked for BellSouth for many years, her knowledge of  
19 BellSouth's operations is clearly outdated. For example, at the top of page 9  
20 of her testimony, Ms. Wellman states "[w]hen a retail customer calls BellSouth  
21 for service, he speaks directly to the Service Representative, who will input an  
22 order directly into one of their order systems, SONGS or DOE, while the  
23 customer is on the line."

24

1 This is not the case. BellSouth does not use SONGS or DOE for the majority  
2 of its retail services. Instead, BellSouth uses Regional Negotiations System  
3 (“RNS”) for its retail operations and Regional Ordering System (“ROS”) for its  
4 retail business operations. Neither RNS nor ROS are designed for ordering  
5 products used by ALECs.

6  
7 BellSouth does use SONGS and DOE, but primarily for ALEC orders received  
8 in the Local Carrier Service Center (“LCSC”). Again, SONGS and DOE are  
9 not configured for ALEC direct access and BellSouth should not be required to  
10 provide ALECs direct access to SONGS and DOE for the reasons outlined in  
11 my direct testimony filed in this proceeding.

12  
13 Ms. Wellman is also incorrect in implying that any given retail customer is on  
14 the line when BellSouth’s representative enters their order. Currently, this is  
15 not the case with large business customers. Also, this is generally not the case  
16 with BellSouth’s use of SONGS and DOE as stated by Ms. Wellman.

17  
18 Finally, at the top of page 11 of her testimony, Ms. Wellman states “[o]nce the  
19 LCSC Service Representative is ready to input the order, she or he uses the  
20 same order input systems that BellSouth retail Service Representatives use.”  
21 As I have previously explained, this is not the case. BellSouth’s LCSC  
22 representatives use SONGS and DOE and BellSouth’s retail representatives  
23 use RNS and ROS – different systems intended for different purposes.

24  
25

1 Unfortunately, Ms. Wellman's misleading information and comparisons  
2 ultimately lead to her conclusion that BellSouth must provide IDS direct access  
3 to SONGS and DOE in order to meet its obligations. Not only is her  
4 conclusion based on wrong information, it is not necessary for meeting the  
5 requirements of the Telecommunications Act of 1996 and the related FCC  
6 rules or the Florida Commission's previous rulings.

7

8 Q. MR. WILSON, PLEASE RESPOND TO MS. WELLMAN'S  
9 RECOMMENDATION, ON PAGE 33 OF HER TESTIMONY, THAT THE FPSC  
10 ORDER DIRECT ACCESS TO DOE AND SONGS.

11

12 A. My recommendation is that the FPSC complete its assessment of BellSouth's  
13 OSS via the Third Party Testing that is well underway, consider the actual  
14 commercial usage of BellSouth's OSS, and maintain its previous decision not  
15 to order direct access to BellSouth's internal OSS. I have previously explained  
16 the reasons why Ms. Wellman's recommendation of direct access to DOE and  
17 SONGS is unfounded and unnecessary.

18

19 Q. DOES THIS CONCLUDE THE PANEL'S TESTIMONY?

20

21 A. Yes.

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