

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 SUPPLEMENTAL REBUTTAL TESTIMONY OF
3 JIMMY PATRICK
4 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
5 DOCKET NO. 010740-TP
6 SEPTEMBER 17, 2001
7

8 Q. MR. PATRICK, PLEASE STATE YOUR FULL NAME, YOUR
9 BUSINESS ADDRESSES, AND YOUR POSITION WITH
10 BELLSOUTH.

11
12 A. My name is Jimmy Patrick. I am employed by BellSouth as Sales
13 Director – OSS. My address is 600 N. 19th Street, Birmingham,
14 Alabama 35203.

15
16 Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?
17

18 A. Yes. On August 27, 2001, I filed panel rebuttal testimony with
19 BellSouth witnesses Jerry Wilson, Pattie Knight and Pat Rand.

20
21 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL
22 TESTIMONY?
23

24 A. The purpose of my supplemental rebuttal testimony is to address a
25 document included in IDS' Supplemental Response to BellSouth's

1 Request for Production Item 3, which asked IDS to produce documents
2 it had received from BellSouth regarding the Electronic Data
3 Interchange (“EDI”) interface. Specifically, I will address a Carrier
4 Notification letter issued by BellSouth on April 5, 1999, in which
5 BellSouth advised ALECs that a specific software application offered by
6 a third-party vendor would not be expanded to handle the business
7 rules for future versions of BellSouth’s EDI interface, which is an
8 interface some ALECs use to access BellSouth’s operations support
9 systems (“OSS”). A copy of this Carrier Notification letter is attached to
10 my testimony as Exhibit JP-1.

11

12 Q. DOES THIS CARRIER NOTIFICATION LETTER STATE THAT ALECS
13 COULD NO LONGER USE THE PERSONAL COMPUTER VERSION
14 OF EDI?

15

16 A. No, it does not. Instead, the letter advises ALECs that a particular
17 commercially available PC-based customer interface package provided
18 by a third party would not support future versions of BellSouth’s EDI
19 interface.

20

21 Again, one of the interfaces that BellSouth offers ALECs for access to
22 BellSouth’s OSS is EDI. ALECs can purchase a software package
23 through a third-party vendor that will enable the ALEC to use EDI via a
24 personal computer. This application is known as EDI-PC, and, in 1999,
25 IDS was using EDI-PC to submit orders to BellSouth.

1 The Carrier Notification letter states that Harbinger, the company that
2 developed the PC-based customer interface package (that is, EDI-PC),
3 would no longer support further development work for EDI-PC. In
4 particular, the letter states that this EDI-PC package would not handle
5 EDI Version 9 or higher. The letter, however, states that EDI-PC is
6 Y2K capable, and it also states that Harbinger would continue to
7 provide support for the existing package. Therefore, EDI-PC in its
8 then-current form would continue to be available to ALECs, and ALECs
9 could continue to use that version of EDI-PC to submit orders.

10

11 If an ALEC wanted to take advantage of future enhancements to EDI,
12 however, that ALEC would need to do one of three things: (1)
13 customize its own interface; (2) purchase an application from a
14 software vendor that would support newer versions of EDI; or (3) use
15 BellSouth's Telecommunications Access Gateway ("TAG") interface.
16 As I explained in my rebuttal testimony, IDS chose to use TAG.

17

18 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL
19 TESTIMONY?

20

21 A. Yes.

22

23

24

25

BellSouth Interconnection Services
876 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91081447

Date: April 5, 1999
To: Competitive Local Exchange Carriers
Subject: CLEC - Harbinger to Discontinue EDI-PC Updates

Electronic Data Interchange - Personal Computer (EDI-PC) uses a commercially available PC-based customer interface package that provides a Graphical User Interface (GUI) for the EDI system. It has been provided to EDI customers by Harbinger, a Value Added Network provider, through its TrustedLink™ Commerce software package.

The Harbinger software is Y2K capable and ANSI Standard 4010 compatible. However, it cannot be expanded to handle the business rules for EDI Version #9 or higher. Harbinger has notified BellSouth that it will no longer support further development work for the TrustedLink™ Commerce EDI-PC package. Harbinger will continue to provide support for the existing package. Other software vendors may develop and provide EDI compatible GUIs that support the more recent EDI versions.

The Telecommunications Access Gateway (TAG) system, combined with a front-end GUI, will provide a CLEC with an integrated customer management solution. This GUI may be developed by a CLEC, obtained from a software provider or purchased from BellSouth. This will allow the CLEC to obtain pre-order information and to do up-front editing, both of which will facilitate sending cleaner, more accurate order transactions to BellSouth. TAG also offers more advanced functional enhancements, Y2K compliance and continuous upgrades.

BellSouth is presently working to develop a standardized CLEC GUI for TAG. Further information on the status of this work will be provided as it becomes available.

Sincerely,

ORIGINAL SIGNED BY JOHN McCAIN FOR JIM BRINKLEY

Jim Brinkley - Senior Director
Interconnection Services

92767535404

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 010740-TP
Exhibit JP-1