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BELLSOUTH TELECOMMUNICATIONS, INC.  
SUPPLEMENTAL REBUTTAL TESTIMONY OF  
LINDA W. TATE  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 010740-TP  
SEPTEMBER 17, 2001

Q. PLEASE STATE YOUR FULL NAME, YOUR BUSINESS ADDRESSES, AND YOUR POSITION WITH BELLSOUTH.

A. My name is Linda W. Tate. I am employed by BellSouth as a Senior Director in the BellSouth Technology Services - Network Services Delivery Organization. My business address is 3737 BellSouth Center, 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. On August 27, 2001, I filed panel rebuttal testimony with BellSouth witnesses Ken Ainsworth and Claude Morton.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL TESTIMONY?

A. The purpose of my supplemental rebuttal testimony is to address the documents included in IDS' Supplemental Response to BellSouth's Request for Production

1 Item 3, which asked IDS to produce documents it had received from BellSouth  
2 regarding the Electronic Data Interchange (“EDI”) interface.

3

4 Q. DO THESE DOCUMENTS SUGGEST THAT EDI COULD NOT SUPPORT  
5 LOOP-PORT COMBINATION ORDERS IN LATE 1999?

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7 A. No, they do not. In late 1999, I was involved in the development and  
8 implementation of electronic interfaces that ALECs were using to access  
9 BellSouth’s operations support systems (“OSS”). In that capacity, I was in a  
10 position to know which ALECs were using which interfaces to access BellSouth’s  
11 OSS, and I know that AT&T used EDI during the late 1999 and early 2000 time  
12 frame to submit orders for loop-port conversions.

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14 Q. DID AT&T HAVE A NETWORK COMBINATIONS AGREEMENT WITH  
15 BELL SOUTH DURING THAT TIME FRAME?

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17 A. No. However, although BellSouth and AT&T did not have a formal Network  
18 Combinations Agreement, BellSouth had agreed to accept such orders from  
19 AT&T for test purposes during that time frame. Any express or implied  
20 suggestion that EDI was not capable of handling loop-port combination  
21 conversion orders during this time frame, therefore, is simply wrong.

22

23 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL  
24 TESTIMONY?

25

1 A. Yes.