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October 3, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
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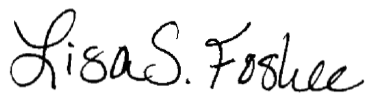
Re: 960786-A-TL (Section 271)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Revised Direct Testimony of Wylie (Jerry) G. Latham, W. Keith Milner and Thomas G. Williams, and Revised Surrebuttal Testimony of Ken L. Ainsworth, Cynthia K. Cox (CKC-10 has also been stricken), W. Keith Milner, Ronald M. Pate, David T. Scollard, and Alphonso Varner, which we ask that you file in the captioned docket. This filing is pursuant to Order No. PSC-01-1830-PCO-TL issued September 11, 2001.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties of record as shown on the certificate of service.

Sincerely,


Lisa S. Foshee (KA)

Enclosures

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

DNS 12566-01 thru 12574-01

**CERTIFICATE OF SERVICE
DOCKET NO. 960786-A-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 3rd day of October, 2001 to the following:

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(+) Signed Protective Agreement

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
REVISED SURREBUTTAL TESTIMONY OF KEN L. AINSWORTH
ON BEHALF OF
BELLSOUTH TELECOMMUNICATIONS, INC.
DOCKET NO. 960786A-TL
OCTOBER 3, 2001

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

A. My name is Ken L. Ainsworth. My business address is 675 W. Peachtree Street, Atlanta, Georgia 30305. I am a Director - Interconnection Operations for BellSouth. I have served in my present position since December 1997.

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. I have previously filed direct testimony in this proceeding on May 31, 2001.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my surrebuttal testimony is to respond to the testimony and Affidavits filed by various parties in response to BellSouth's May 22, 2001 filing.

1 Q. PLEASE RESPOND TO AT&T'S TESTIMONY DEALING WITH
2 REASSIGNMENT OF TELEPHONE NUMBERS.

3
4 A. Ms. Denise Berger of AT&T (pgs. 32-33) alleges that BellSouth has a chronic
5 number reassignment problem. BellSouth has previously identified two issues that
6 caused a problem with duplicate assignment of ported telephone numbers. The first
7 issue was identified in 1999. BellSouth determined that when orders were issued
8 without a certain field identifier ("FID"), the number would not indicate a ported
9 designation in BellSouth's number assignment database. This could allow for a
10 number reassignment. In December of 1999, BellSouth implemented an edit in the
11 order negotiations systems, to ensure that the appropriate FIDs were included on
12 the ported out order, thus preventing the erroneous duplication of number
13 assignments. At the same time, a review of BellSouth's embedded base of
14 telephone numbers was conducted to ensure errors that may have occurred prior to
15 the implementation of the edit were corrected.

16
17 The second issue surfaced in the last quarter of 2000. Reports of telephone
18 numbers being reassigned again surfaced. After researching the problem,
19 BellSouth determined that due to a software upgrade that a ported block of DID
20 numbers would only mark the lead number as ported in the number database. A
21 software solution currently is being pursued to resolve this issue. BellSouth
22 implemented an interim manual solution in January 2001 to correct this problem.
23 The manual workarounds will continue to ensure all future port out activity will be
24 properly marked in BellSouth's number assignment database to prevent duplicate
25 assignment of numbers.

1 Additionally, BellSouth began working with AT&T and all Alternative Local
2 Exchange Carriers (“ALECs”) to verify all numbers that had been ported since
3 January 2000. A manual verification and correction, if necessary, was performed
4 on all numbers affected by this issue. The review and correction for AT&T was
5 completed on May 23, 2001. In summary, BellSouth believes that these problems
6 have been identified and corrected.

7
8 Q. PLEASE EXPLAIN THE PROBLEMS AT&T CUSTOMERS HAVE
9 REGARDING DUPLICATE BILLING.

10
11 A. AT&T witnesses, Ms. Berger (pgs. 35-36) and Ms. Wheeler (pg. 11), raise issues
12 dealing with duplicate billing of AT&T customers after they have switched local
13 providers. Duplicate billing does, on occasion, occur. However, the source of the
14 problem can be caused by the ALEC or by BellSouth. For example, Ms. Berger
15 failed to mention that there could be duplicate billing for disconnects processed
16 during a current billing period, where the ALEC does not transfer all of the end user
17 services or in situations where the ALEC does not properly complete the porting of
18 all telephone numbers associated with their Local Service Request (“LSR”). The
19 issuance of a final bill will be a duplicate that is necessary to close the account from
20 BellSouth's records. If the ALEC does not transfer all of the end-users' services
21 then BellSouth will continue to bill for the remaining services provided by
22 BellSouth and duplicate billing will occur. The improper number porting by the
23 ALEC will not allow the order to be processed and billing will continue until the
24 porting discrepancy is resolved.

25

1 BellSouth has worked within the various collaboratives to investigate and resolve,
2 where necessary, these types of issues. Where duplicate billing issues do occur, the
3 proper process is for the ALEC to contact the Billing Resolution Group who will
4 investigate any individual issues and work with the ALEC to resolve it in an
5 expeditious manner.

6

7 Q. PLEASE ADDRESS THE PARTIAL PORT ISSUE.

8

9 A. Ms. Berger's allegation (pgs. 36-37) that BellSouth does not have the ability to
10 efficiently handle the partial porting of a customer's service from BellSouth to
11 another ALEC is simply not the case. BellSouth has detailed processes and
12 procedures for provisioning a partial port of a customer's service. The process can
13 be found in the BellSouth Business Rules located on the Internet at
14 <http://www.interconnection.bellsouth.com/guides/html/leo.html> (see Section 2.4 of
15 the General Local Service Ordering Information for Partial Migration).

16

17 Ms. Berger did not provide any specific examples in support of her allegations;
18 thus, BellSouth cannot specifically address her concerns other than to say that
19 BellSouth successfully conducts partial migrations for ALECs without any
20 interruption to the end user's service every day.

21

22 I would also point out that to effectuate an efficient partial migration of service,
23 ALECs have responsibilities. As an example, ALECs must provide the main
24 billing account number that will be porting on the LSR. Additionally, the ALEC
25 must obtain from the end user the new billing telephone number ("TN") that will

1 remain with BellSouth. An ALEC's failure to adhere to the proper processes will
2 impact the efficiency of the partial port process.

3

4 Q. PLEASE RESPOND TO WHAT MS. BERGER REFERS TO AS A "SNAP
5 BACK".

6

7 A. Ms. Berger's discussion of "snap back" (pgs. 41-42) references a scenario in which
8 AT&T would like for BellSouth to return a customer to BellSouth after they have
9 been ported to AT&T. If AT&T requests that the number port order be canceled
10 prior to porting, the order will be canceled. AT&T is in control of when the
11 number is ported. BellSouth does not perform the activation of the number port.
12 Once AT&T has ported a customer's number in NPAC, the order is completed and
13 BellSouth requires that an order be issued to port the customer back to BellSouth.
14 BellSouth has to assume that when an order is received and a Firm Order
15 Confirmation ("FOC") is issued, AT&T intends for that order to be worked. If
16 AT&T discovers that either the customer has changed their mind or that AT&T has
17 problems that will not allow them to provide service to the customer, AT&T should
18 notify BellSouth of this prior to the scheduled date for the port and AT&T should
19 not perform the number port activation. After AT&T has ported the number,
20 BellSouth would expect a service order from the customer if they wish to return to
21 BellSouth.

22

23 Q. DO YOU BELIEVE THAT BELL SOUTH IS CAUSING A NEGATIVE IMPACT
24 ON CUSTOMERS IN THIS SITUATION?

25

1 A. No. AT&T is in complete control of the number port activation process. AT&T
2 also has the opportunity to perform line test prior to port activation. This should
3 negate the need for post-port issues and snap backs. Also snap backs without
4 establishing valid orders would increase the opportunity for additional negative
5 customer impacts. BellSouth's process is to work with the ALEC to resolve any
6 post port issue as expeditiously as possible. This process minimizes service
7 impacts, additional customer inconvenience and the need for unnecessary rework.

8
9 Q. PLEASE RESPOND TO THE ALLEGATIONS OF ACCESS INTEGRATED
10 CONCERNING INSTANCES OF DISCRIMINATORY CONDUCT ON
11 PROVISIONING AND MAINTENANCE ISSUES.

12
13 A. Mr. Rodney Page of ACCESS Integrated (hereinafter "ACCESS") has presented
14 several affidavits of individuals that present a number of isolated events concerning
15 BellSouth's wholesale operations (Section II). Although I consider these as
16 random and not representative of the overall service BellSouth provides to
17 ACCESS and its end users, I will address each complaint as it relates to wholesale
18 service using the information, if any, that is available to BellSouth.

19
20 Concerning the testimony of Cathy Sparks of Carpet Connections (see
21 Exhibit RP-1, pgs. 2-3) and Carpet Connections' access to Directory Assistance,
22 our records indicate that the D Order discontinuing billing from BellSouth was
23 completed on August 24, 2000. The associated N Order to establish billing for
24 ACCESS completed August 24, 2000, as well, but encountered a post completion
25 billing error that required manual correction. The correction was completed on

1 September 19, 2000 and processed to downstream systems including Operator
2 Service/Directory Assistance (OS/DA). The end user was listed in the OS/DA
3 database at that time. These types of post-completion errors occasionally occur in
4 BellSouth's completion process and although the delay in correcting the error was
5 excessive in this case, the same scenario can happen to a BellSouth end user, to
6 BellSouth's affiliates or during processing of any order through BellSouth's legacy
7 systems. BellSouth does have processes in place to identify these situations and
8 expeditiously resolve these issues.

9 I will also respond to the testimony of Carol Duffey, Service Representative, and
10 ACCESS' problems with access to telephone numbers (see Exhibit RP-1, pgs. 6-7).
11 Ms. Duffey asserts that BellSouth refused access to telephone numbers 678/772-
12 8835 and 678/772-8845 for end user IMMCO. Additionally, Ms. Duffey asserts
13 that IMMCO subsequently switched their service back to BellSouth and was able to
14 obtain the requested number assignments not available to ACCESS.

15
16 Generally, BellSouth's number assignment policy used to administer telephone
17 numbers for itself, its end users, its affiliates and ALECs is the same. For
18 residential numbers that have been disconnected, a 90-day waiting period and for
19 business numbers an interval of one year is required prior to the numbers being
20 available for reassignment.

21
22 This attempts to ensure that the new end user does not receive calls for the previous
23 user of the telephone number.

24

1 Although Ms. Duffey may have dialed the requested business numbers and received
2 an intercept message, the numbers had not cycled through the required waiting
3 period.

4

5 Ms. Duffey correctly asserts that the end user migrated back to BellSouth; however,
6 incorrectly states that BellSouth allowed the end user IMMCO to have the numbers
7 previously requested by ACCESS. Both numbers are on intercept and are still
8 cycling in the required waiting period.

9

10 The affidavits of Carol Roberts, Mary Parker and Raymond Parker (see Exhibit
11 RP-1, pgs. 12-15) and their difficulty working with BellSouth technicians trouble-
12 shooting problems on their lines.

13

14 The information presented by these individuals conflict with the information
15 BellSouth has recorded as to the events described by the above affiants. BellSouth
16 records indicate that a problem existed with inside wiring that was ultimately fixed
17 by moving the network interface away from a leaking air conditioning unit. First,
18 the additional jack was ordered on April 4, 2001. There was no service order
19 activity on this account in February 2001 as the affiants stated. After the jack was
20 added on April 4, 2001, ACCESS reported a trouble on April 8, 2001 indicating
21 that the jack was not working correctly. The trouble was closed on April 9, 2001 at
22 12:50 p.m. by an outside technician indicating that no trouble was found with the
23 circuit. On April 9, 2001, a trouble again was reported by ACCESS indicating that
24 there was no dial tone on the circuit. The circuit was tested with a Hard Ground
25 and was dispatched outside for repair. The BellSouth technician found no trouble

1 on the circuit to the demarcation point (DMARC) and requested authorization for
2 inside repair from ACCESS. Once inside repair was authorized, the trouble was
3 cleared by repairing deregulated inside wire. The repair was completed on
4 April 10, 2001 at 10:10 a.m. ACCESS initiated a service order to move the
5 DMARC on April 14, 2001. The service order was to move the DMARC because
6 it was getting wet from an AC unit causing the hum and static on the lines. The
7 DMARC was moved per the service order and the problems with the jacks and hum
8 and static on the lines have not been reported since.

9
10 Additionally, these three affidavits allege that BellSouth technicians engaged in
11 unauthorized forwarding of calls to Parker's competitor on April 10, 2001. Having
12 been informed of these allegations by a letter dated May 2, 2001 from ACCESS to
13 Phil Jacobs at BellSouth, BellSouth investigated the matter.

14
15 As part of its investigation, BellSouth reviewed customer service records and call
16 detail records as well as conducted interviews of Mr. Parker and four BellSouth
17 employees, one of whom was the service technician in question. This investigation
18 revealed that Call Forwarding was activated on the telephone line for Parker from
19 10:36 a.m. on April 10, 2001 until this feature was deactivated at 11:27 a.m. that
20 same day. However, the BellSouth service technician in question was working at
21 two other customer locations at all relevant times, and BellSouth has no reason to
22 believe that the service technician had anything to do with activating the Call
23 Forwarding feature as has been alleged.

24

1 BellSouth records reflect that the service technician placed testing calls from
2 another customer's premises (a drywall company) minutes before the Call
3 Forwarding feature was activated on Parker's telephone line. Two minutes after the
4 Call Forwarding feature was activated on Parker's telephone line, the service
5 technician closed out the drywall company assignment and was dispatched to
6 another customer's location (a military facility). At 11:05 a.m. on April 10, 2001,
7 the service technician signed for the telephone room key at the military facility,
8 which the service technician returned twenty minutes later. The sign in log for the
9 military facility reflects that the service technician signed the telephone key back in
10 at 11:25 a.m., two minutes before the Call Forwarding feature was activated at
11 11:27 a.m.

12
13 In short, both immediately before and immediately after the Call Forwarding
14 feature was activated and two minutes before the feature was deactivated, the
15 service technician in question was somewhere else. The service technician
16 steadfastly denies activating the Call Forwarding feature on Parker's telephone line
17 and insists that he does not know who competes against Parker or the names (let
18 alone telephone numbers) of any monument companies in Albany. Neither of the
19 two telephone directories published in Albany contains a listing of the competitor
20 to which Parker's calls were forwarded.

21
22 Based on its investigation, BellSouth has been unable to uncover any evidence that
23 its service technician caused incoming calls of Parker to be forwarded to a
24 competitor. While the Call Forwarding feature was activated on Parker's telephone
25 line for approximately 50 minutes on April 10, 2001, and while BellSouth regrets

1 any inconvenience caused to ACCESS' customer, BellSouth has no reason to
2 believe that any of its employees were involved. This is particularly true given that
3 the competitor's telephone number to which some calls to Parker were forwarded is
4 not generally available. The results of BellSouth's investigation of this matter were
5 communicated to Mr. William T. Wright, President of ACCESS, by a letter from
6 Hubert Hogeman, BellSouth's Chief Counsel – Marketing, on May 30, 2001.

7

8 Q. PLEASE RESPOND TO MR. JAMES HVIDDAS' TESTIMONY ON BEHALF
9 OF US LEC.

10

11 A. Mr. Hvisdas refers to his Exhibit JH-1 as containing 136 trouble tickets on outages
12 experienced on EELs purchased from BellSouth. Out of the 136 troubles, 130 of
13 them are Special Access circuits to which I cannot comment. Only six of the
14 reports were placed as UNE troubles. One of the six has an invalid trouble ticket
15 number and could not be found. The remaining five troubles were not reported on
16 EELs at all, but were reported as either US LEC customers who could not call
17 BellSouth customers or vice versa. Mr. Hvisdas alleges that the average clearing
18 time on the troubles on his exhibit was 44 hours. Four of the five troubles reported
19 as UNE troubles had an average clearing time of 1.4 hours. Analysis of the four
20 tickets indicates that three of them did not have a trouble on the BellSouth network.
21 One of the four was experiencing trouble due to trunk blockage. This was resolved
22 by adding additional trunks to a trunk group. Only one of the five troubles carried
23 an excessive clearing time. This trouble was determined to be a routing problem
24 that did take 97 hours to resolve. Mr. Hvisdas' allegation that BellSouth fails to
25 provide reliable facilities to ALECs is completely unsubstantiated by his exhibit.

1 **There was no facility trouble identified on any of the troubles reported as Local**
2 **UNE problems.**

3

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5

6 **A. Yes.**

7

8

9

10

11

12

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14