

Lisa S. Foshee  
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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  
Tallahassee, FL 32399-0850

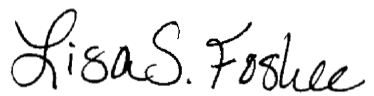
**Re: 960786-A-TL (Section 271)**

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

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REVISED SURREBUTTAL TESTIMONY OF DAVID P. SCOLLARD  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4 DOCKET NO. 960786A-TL  
5 OCTOBER 3, 2001  
6

7 Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH  
8 BELL SOUTH TELECOMMUNICATIONS, INC.

9  
10 A. I am David P. Scollard, Room 28A1, 600 N. 19th St., Birmingham, AL 35203.  
11 My current position is Manager, Wholesale Billing at BellSouth Billing, Inc.  
12 (“BBI”), a wholly owned subsidiary of BellSouth Telecommunications, Inc.  
13 (“BellSouth”). In that role, I am responsible for overseeing the implementation  
14 of various changes to BellSouth’s Customer Records Information System  
15 (“CRIS”), Carrier Access Billing System (“CABS”), and BellSouth Industrial  
16 Billing System (“BIBS”).

17  
18 Q. ARE YOU THE SAME DAVID SCOLLARD THAT FILED DIRECT  
19 TESTIMONY IN THIS PROCEEDING?

20  
21 A. Yes.

22  
23 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS  
24 PROCEEDING?

25

1 A. The purpose of my testimony is to reply to the testimony of Alternative Local  
2 Exchange Carrier (“ALEC”) witnesses in this proceeding pertaining to the  
3 systems and processes BellSouth uses to bill ALECs for the services ordered  
4 from BellSouth.

5

6 **Checklist Item (i): Interconnection**

7

8 Q. ON PAGES 11 THROUGH 13 OF HIS REBUTTAL TESTIMONY,  
9 WORLDCOM WITNESS MR. ARGENBRIGHT BRINGS UP AN ISSUE  
10 HE DESCRIBES AS THE “TRUNK FRAGMENTATION” ISSUE. IS THIS  
11 STILL AN ISSUE BETWEEN BELLSOUTH AND WORLDCOM?

12

13 A. No. As Mr. Argenbright himself describes, BellSouth makes available to  
14 ALECs the “super group” which can accommodate the trunking that  
15 WorldCom is seeking. The Florida Commission found in the MCI arbitration  
16 proceeding (PSC Order page 82 - 83) that the proposal from BellSouth should  
17 be adopted. In any event, BellSouth is at a loss as to why WorldCom continues  
18 to raise issues that the companies have worked diligently with the Commission  
19 to resolve.

20

21 Q. HAS ANYTHING CHANGED SINCE THE COMMISSION’S ORDER TO  
22 CHANGE THE FACT THAT ADVERSE BILLING IMPACTS WOULD BE  
23 SEEN IF WORLDCOM’S POSITION IS ADOPTED?

24

25

1 A. Yes. BellSouth has determined that if MCI were to use a supergroup trunk,  
2 then MCI may include local, intra-LATA toll and transit traffic for calls  
3 originating from MCI's local customers in Florida on the same trunk group.  
4 The interconnection agreement language has been revised to reflect this fact.

5

6 Q. MR ARGENBRIGHT, ON PAGES 14 THROUGH 17 OF HIS TESTIMONY,  
7 TURNS HIS ATTENTION TO THE "TANDEM PROVIDER" ISSUE. DID  
8 WORLDCOM RAISE THIS ISSUE IN ITS RECENT ARBITRATIONS  
9 WITH BELLSOUTH IN FLORIDA?

10

11 A. Yes.

12

13 Q. WHAT WAS THE RESULTS OF THAT ARBITRATION?

14

15 A. The Commission agreed with BellSouth that the limitations inherent in mixing  
16 local and access traffic on local trunk groups would render BellSouth unable to  
17 bill MCI for any of the traffic (PSC Order at page 93). In light of that and other  
18 issues, the Commission ordered that MCI use access facilities in order to route  
19 access traffic to BellSouth's network.

20

21 Q. HAS ANYTHING CHANGED SINCE THE COMMISSIONS ORDER TO  
22 CHANGE THE FACT THAT ADVERSE BILLING IMPACTS WOULD BE  
23 SEEN IF WORLDCOM'S POSITION IS ADOPTED?

24

25



1 A. No. Generally, the result would be that BellSouth would be unable to bill  
2 WorldCom for its use of the local interconnection trunk. Each type of  
3 interconnection facility carries with it unique characteristics with regard to the  
4 recording of billing data for calls going across that facility. In the case of traffic  
5 coming across WorldCom's local interconnection facilities, the call records do  
6 not record information necessary to determine which calls are WorldCom's  
7 local calls and which ones are access calls originating from another carrier. The  
8 plain truth is that when WorldCom sends a call across its local interconnection  
9 trunks, it is recorded in BellSouth's network as just that – a call originated  
10 from WorldCom's local customer and sent to BellSouth. Therefore, BellSouth  
11 cannot distinguish this access traffic from the other local traffic based on the  
12 call records.

13

14 Q. MR. ARGENBRIGHT SUGGESTS ON PAGE 15 OF HIS TESTIMONY  
15 THAT BELLSOUTH CAN ACCEPT SELF-REPORTED USAGE RECORDS  
16 FROM WORLDCOM WITH WHICH TO BILL. WHAT IS BELLSOUTH'S  
17 RESPONSE TO THAT PROPOSAL?

18

19 A. Mr. Argenbright's suggestion is merely a description of how the access traffic  
20 could be billed to the interexchange carrier via some meet point billing  
21 arrangement. What Mr. Argenbright fails to understand is that his proposal  
22 would put a provider at the mercy of a customer to "self-report" usage for  
23 billing back to the customer. As I mentioned earlier, when traffic is placed  
24 across a local interconnection trunk, the usage records provide only enough  
25 information to identify the ALEC which ordered the trunk and that a local call

1 was sent for completion. If WorldCom were allowed to mix access traffic  
2 (which is to be billed to an interexchange carrier) with the local traffic (to be  
3 billed to WorldCom), all of the usage records resulting from that traffic would  
4 be corrupted and unusable. Therefore, BellSouth would be required to wait on  
5 WorldCom to provide information as to what portion of the combined traffic is  
6 real local traffic billable to WorldCom and the portion that is to be billed to the  
7 other carriers. This type of "self reporting" of usage for billing creates  
8 opportunities for abuse.

9  
10

11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

12

13 A. Yes.

14

15

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17

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25