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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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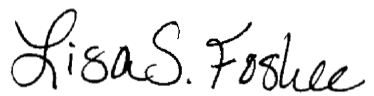
Re: 960786-A-TL (Section 271)

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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BELLSOUTH TELECOMMUNICATIONS, INC.
REVISED SURREBUTTAL TESTIMONY OF ALPHONSO J. VARNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
FILED OCTOBER 3, 2001
DOCKET NO. 960786A-TL

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

A. My name is Alphonso J. Varner. I am employed by BellSouth as Senior Director in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my Rebuttal Testimony is to respond to Testimony filed by certain Competitive Local Exchange Carrier (ALEC) Witnesses in this proceeding as relates to the BellSouth Service Quality Measurements (SQM) and the integrity of the SQM data. With regard to performance data, my Rebuttal Testimony confirms the following points:

- BellSouth's performance data is reliable;
- BellSouth's performance data demonstrates that BellSouth is in Compliance with the requirements of Section 271 of the Act;

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1 • BellSouth's Monthly State Summary (MSS) report is an appropriate
2 tool to us in assessing BellSouth's performance.

3

4 Q. GIVEN THE PURPOSE OF YOUR TESTIMONY AND THE CRITICISM
5 BY ALECs WHAT IS THE ROLE OF PERFORMANCE
6 MEASUREMENTS?

7

8 A. Performance data is just one of many tools available to evaluate
9 performance. Because performance data is quantitative, there is a natural
10 tendency to try to use it as a simple way to answer a complex question.
11 That question is at the core of this proceeding – namely – Is BellSouth
12 providing non-discriminatory performance to ALECs?

13

14 To answer that question requires using performance data simply as an
15 additional tool in deciding whether BellSouth is meeting its obligations.
16 Performance data must be used in conjunction with the other evidence to
17 evaluate performance. Each of BellSouth's witnesses illustrates how
18 BellSouth meets its obligations. It would be a mistake to ignore their
19 testimony when evaluating performance and simply substitute a set of
20 numbers for it.

21

22 For example, lets look at the trunk blockage measure. BellSouth has a
23 measure that compares ALEC performance to BellSouth performance
24 during the same time periods. But to truly understand BellSouth's
25 performance, the numbers must be viewed in the context of Mr. Milner's

1 testimony regarding the processes used to provision trunks. The
2 testimony of BellSouth's other witnesses is at least as vital to performance
3 evaluation as the numbers are. In fact, where transaction volumes are
4 low, that other testimony is a far more important basis, if not the only
5 basis, for conclusions regarding performance.

6

7 To utilize performance data effectively, a few criteria need to be met. First
8 the number of transactions has to be high enough for the measurement to
9 be meaningful. Second, the measurement has to be designed to measure
10 the area of performance being evaluated. Also, the performance
11 standards have to be reasonable. Under these conditions, performance
12 data can be an effective tool. But it is only a tool not a substitute for an
13 overall evaluation

14

15 Q. WHAT IS YOUR OVERALL ASSESSMENT OF THE DATA TESTIMONY
16 TO WHICH YOU RESPOND?

17

18 A. The testimony of the ALEC witnesses has not identified any systemic
19 deficiencies in the performance data that would impact the Commission's
20 ability to evaluate BellSouth's performance. My testimony shows that
21 many of their so-called deficiencies are unfounded. The remainder are
22 largely a combination of isolated old occurrences, mischaracterizations of
23 the data, objections to update schedules or attempts to define differences
24 in position as errors. Apparently, the ALECs' strategy is to make

1 voluminous claims, however meritless, in an attempt to persuade the
2 Commission to unnecessarily delay BellSouth's interLATA entry.

3

4 Q. GENERALLY HOW IS PERFORMANCE DATA PRODUCED?

5

6 A. Ms. Norris Exhibit SEN-4 shows the primary data collection processes
7 used by BellSouth to generate the Interim SQM reports. Interim SQM
8 reports are based on the source data captured in BellSouth's
9 legacy/source systems. BellSouth employs three primary delivery
10 processes to transform the legacy system data into the published Interim
11 SQM reports; i.e. PMAP, BARNEY, and Manual. I will describe each of
12 these methods more fully below.

13

14 Before assessing the integrity of BellSouth's performance measurement
15 data, it is important that the Commission understand the sheer magnitude
16 of the systems and processes that BellSouth has implemented to produce
17 that data. BellSouth's performance data system is called the Performance
18 Measurements Analysis Platform (PMAP).

19

20 The massive size of PMAP is a key factor that should be kept in mind
21 when assessing the impact of the ALECs' claims regarding data. A
22 system this large cannot be flawless, and the volume of data produced
23 should be considered when assessing the inferences ALECs make about
24 the integrity of data. PMAP approaches the size of the Internet in 1999,
25 and processes about 100 million records each month. I will discuss this

1 point further in a moment. In addition, PMAP has been audited and will be
2 audited each year for the next five years.

3

4 Ms. Norris Exhibit SEN-4 shows the primary data collection processes
5 used by BellSouth to generate the Interim SQM reports. Interim SQM
6 reports are based on the source data captured in BellSouth's
7 legacy/source systems. BellSouth employs three primary delivery
8 processes to transform the legacy system data into the published Interim
9 SQM reports; i.e. PMAP, BARNEY, and Manual. I will describe each of
10 these methods more fully below.

11

12 Q. IN MS. NORRIS' TESTIMONY ON PAGE 7 SHE DISCUSSES HOW
13 BELLSOUTH'S DATA COLLECTION AND PERFORMANCE MEASURES
14 REPORTING SYSTEMS WORK. IS HER EXPLANATION ACCURATE?

15

16 A. No. Specifically, Ms. Norris inaccurately describes the processing that
17 takes place between BellSouth's SNAP and PMAP Staging database.
18 There are, in fact, no business rules or exclusions applied to the early
19 stage data in the SNAP database before it is sent to the PMAP Staging
20 database. Staging is simply a copy of the SNAP data as Ms. Norris'
21 Exhibit SEN-4 reflects.

22

23 Q. CAN YOU FURTHER DESCRIBE THE SYSTEMS AND PROCESSES BY
24 WHICH BELLSOUTH CALCULATES THE SQM DATA?

25

1 A. Yes. PMAP is the system in which the majority of the SQM values are
2 produced as shown in Ms.Norris' Exhibit SEN-4. The source data
3 accumulated in the legacy systems are transferred to the Interexchange
4 Carrier Analysis and Information System (ICAIS). These data transfers
5 are initiated and executed by automated scripts. Each month a "snapshot"
6 of the ICAIS data is extracted into the SNAP database. The combination
7 of ICAIS and SNAP constitutes BARNEY. This monthly "snapshot" of data
8 is typically referred to as "early stage data" but Ms. Norris calls it raw data
9 which creates some confusion. SNAP is then copied into PMAP Staging,
10 the database used to store the data that will be analyzed and processed to
11 generate the final SQM values. From Staging, the data tables are
12 transferred to the Normalized Operational Data Store (NODS), which puts
13 the data into a normalized format. NODS then passes the data to the
14 Dimensional Data Store (DDS), which summarizes and aggregates the
15 data. The final SQM reports are generated by queries run against the
16 DDS data. The data from NODS are also used to generate the data files
17 made available to the ALECs and utilized by BellSouth to validate the final
18 SQM reports. These files are the raw data that BellSouth provides. No
19 data exclusion or business logic is applied to the records prior to the
20 transfer of data into the NODS database.

21
22 Finally, the nature of several Interim SQM reports, e.g. billing, requires
23 that the bulk of the data collection and processing requirements be
24 executed manually, using spreadsheets and other simple database
25 management tools. For these reports, the process owner for each

1 manually produced Interim SQM is responsible for collecting and
2 formatting the legacy system source data that is loaded directly into the
3 PMAP DDS database. The Interim SQM reports are then generated by
4 queries run against the DDS data using the same final process step
5 employed for PMAP results reporting.

6

7 Q HOW LARGE IS PMAP?

8

9

10 A. PMAP is enormous. In order to have a feel for just how big the PMAP
11 database is consider that 86 million records composing 110 Gigabytes of
12 data had to be transported and processed to produce the March 2001
13 Interim SQM results and the volume grows each month. To put this in
14 perspective, one page of my testimony would require about 2 Kilobytes of
15 storage. PMAP, therefore, processes the equivalent of 55 million pages
16 each month.

17

18 In addition to monthly processing, data must be stored for multiple months
19 in the PMAP database. The current PMAP database is approximately 2.5
20 Terabytes in size or 1.25 billion pages of text documents, or the equivalent
21 of 312,500 cases of paper. To put this into perspective, a 1999 study by
22 Sarnoff Corporation on behalf of the US government put the size of the
23 entire Internet in 1999 at approximately 3 Terabytes.

24 (<http://www.wavexpress.com/faq.html>). More importantly, BellSouth's
25 performance measurements have nearly exhausted the capability of the
26 existing PMAP system. As a result, BellSouth is implementing a next

1 generation PMAP platform, PMAP-NG, which is currently in development.
2 When implemented, PMAP-NG will start processing the data on a daily
3 basis as opposed to taking a snapshot of all the data once a month and
4 then processing that data over a two-week period, which is what PMAP
5 does currently. Consequently, BellSouth estimates that PMAP-NG will
6 process 1,250 million records composing over 400 Gigabytes of data and
7 the PMAP-NG database is estimated to be 4.5 Terabytes in size.

8

9 Q. WHAT OTHER SIGNIFICANT RESOURCES DOES BELL SOUTH
10 DEVOTE TO PERFORMANCE MEASUREMENTS?

11

12 A. In addition to the enormous PMAP system processing 100 million records
13 each month, BellSouth has over 300 people devoted to the production of
14 performance measurements. These resources are required to produce the
15 2200 sub-metrics in the Interim SQM.

16

17 Q. HOW IS PERFORMANCE DATA VALIDATED?

18

19 A. BellSouth's Interim SQM data is verified and validated in several ways to
20 maintain the integrity of the data and insure that no data is lost. First,
21 BellSouth's systems have internal quality assurance controls. Second,
22 BellSouth has implemented manual data validation processes within and
23 between data processes. These checks take place for both BellSouth data
24 and ALEC data. Third, BellSouth has undergone a stringent Third Party
25 Audit of its performance data generation process conducted by KPMG as

1 ordered by the GPSC. Finally, PMAP will be audited annually by an
2 outside auditor.

3
4 BellSouth's systems execute a number of validation checks to ensure that
5 no records are lost between databases from the legacy systems to PMAP
6 staging. In addition, raw data validation scripts are used to insure that the
7 raw data made available to ALECs on the Web can be used to produce
8 the PMAP reports posted to the Web.

9
10 BellSouth also performs a number of manual validation processes on the
11 data each month to assess its accuracy and completeness. These
12 validation processes can be divided into two categories – code validation
13 and business validation. In the first process, the data production team
14 analyzes and validates the computer code. This team validates the
15 computer programming to insure the data is produced in accordance with
16 the code. The second data validation process is conducted by the Data
17 Analysis team. The Data Analysis team is a group of Business Analysts,
18 who perform reasonableness checks on the data. For example, they may
19 review data for the current month compared to the previous month to see
20 if volumes or volume changes are reasonable from a business standpoint.
21 Another function of the Data Analysts is to insure that accurate Interim
22 SQM Definitions, Business Rules, and Exclusions are applied to the data.
23 Similarly, experts in the field (Network Operations, Local Carrier Service
24 Center (LCSC)) review the performance results to validate that the results
25 are reasonable.

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Q. HAVE BELLSOUTH PERFORMANCE MEASUREMENTS SYSTEMS AND PROCESSES BEEN INDEPENDENTLY REVIEWED?

A. Yes. KPMG conducted a metrics evaluation in connection with the Georgia Third Party Test. Although in some cases the measures that KPMG evaluated were different than the measures in the Interim SQM, the systems and processes that were audited are the same as those from which the current Interim SQM is reported. For the data integrity test criteria, BellSouth has satisfied 409 out of 420 (97%) test criteria. Ten of the other criteria are not complete, meaning that KPMG has more work to do. KPMG currently is conducting a second audit of BellSouth's performance metrics to address those measures that have been added or changed since the first audit. This audit will complement the audit that KPMG has already conducted.

In addition, the yearly audit of BellSouth's performance data collection and analysis conducted by an independent audit firm will continue to insure the integrity of BellSouth's performance data. In its Massachusetts Order, the Federal Communications Commission (FCC) recognized the value of such audits in maintaining data integrity. See Verizon- MA Order CC Docket 01-9 dated April 16, 2001, para 247.

Q WHAT REPORTS DOES BELLSOUTH PROPOSE FOR THIS COMMISSION TO USE IN EVALUATING PERFORMANCE?

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A. BellSouth proposes that this Commission use the Monthly State Summary (MSS) reports as the means to assist the Commissions in evaluating BellSouth's compliance with the InterLATA checklist. The MSS is the only report that provides statewide aggregate data for all ALECs in Florida with a comparison to benchmarks of retail analogs. The MSS also displays this data in a format with which the FCC and Department of Justice (DOJ) are familiar. Further, when the ALEC witnesses refer to BellSouth's performance in their testimony they are referencing performance as reported in the MSS.

Q. PLEASE DESCRIBE THE MSS DATA TO WHICH YOU AND THE ALECS REFER?

B. The MSS provides data in accordance with the measurements, business rules, and calculations that this Commission recently adopted in Docket 960786-TL, order dated July 2, 2001. However there are some minor differences in the benchmarks because the MSS can only be produced consistent with the SQM in one state. Since Georgia had the initial requirement to produce statewide data, the MSS uses the Georgia SQM as its basis. Except for measurements for collocation, change management and BFR-2, the standards in the MSS equal or exceed those in the Florida Interim SQM

1 **KMC WITNESSES – MARIO ESPIN AND JIM SFAKIANOS**

2

3 Q. ON PAGE 4 OF HIS TESTIMONY, MR. ESPIN ADDRESSED
4 INSTALLATION APPOINTMENTS AS DOES MR. SFAKIANOS ON PAGE
5 6 FOR KMC IN DAYTONA BEACH. HOW DO YOU RESPOND?

6

7 A. KMC does not provide detailed information to support these claims and
8 BellSouth does not currently track this data at the MSA level. Our internal
9 records show that in Florida, for the months of January to June, KMC's
10 results for Missed Installation Appointments caused by BellSouth across
11 all product areas are as follows, 9.58%, 11.81%, 4.12%, 8.19%, 5.57%,
12 and 1.76%. First of all, these numbers are much lower than the numbers
13 self reported by KMC for the Daytona Beach MSA. The average
14 percentage of Missed Installation Appointments that were caused by
15 BellSouth from January Through June 2001 was only 6.48%. For the
16 month of May in Florida BellSouth was in parity for 16 out of 19 Resale
17 Products and 23 out of 25 UNE Products for the % Missed Installation
18 Appointments Measure. Furthermore, the Missed Installation
19 Appointments caused by BellSouth were much lower than the end user
20 misses by KMC.

21

22 Q. ON PAGE 9 OF MR. ESPIN'S TESTIMONY AND PAGE 3 OF MR.
23 SFAKIANOS' TESTIMONY, KMC STATES THAT FOR THE MONTH OF
24 APRIL 8% OF THE CIRCUITS THAT BELL SOUTH INSTALLED FOR

1 KMC HAD TROUBLES WITHIN 30 DAYS OF THE INSTALLATION.

2 WOULD YOU COMMENT ON THIS?

3

4 A. The April 2001 numbers that KMC discusses for DS1 lines are basically
5 correct, but do not indicate systemic substandard performance. For the %
6 Provisioning Troubles within 30 Days Metric in Florida, of the products that
7 are ordered by KMC that have volumes for April and May 2001, BellSouth
8 was in parity for 9 out of 13 Products for April and 10 out of 13 Products
9 for May 2001. These figures do not support Mr. Espin's claim of serious
10 outage problems

11

12 Q. ON PAGE 9 OF MR. ESPIN'S TESTIMONY AND PAGE 4 OF MR.
13 SFAKIANOS' TESTIMONY, THEY CONCLUDE THAT BELL SOUTH
14 DOES NOT COMPLETE REPAIRS PROPERLY. PLEASE RESPOND.

15

16 A. The % Repeat Troubles within 30 days measure improved 4.81% for all
17 products in May, and for both April and May these figures were in parity
18 with BellSouth retail. Consequently no indication of disparate treatment is
19 indicated.

20

21 **NEW SOUTH WITNESS - JOHN FURY**

22

23 Q. ON PAGE 14 OF HIS TESTIMONY, MR. FURY STATES THAT NEW
24 SOUTH HAS GENERAL CONCERNS REGARDING DELAY IN
25 DELIVERY OF FOCS, EXCESSIVE NUMBER OF ORDERS IN
26 JEOPARDY, EXCESSIVE MISSED APPOINTMENTS, AND MULTIPLE

1 PROVISIONING PROBLEMS. HOW DO YOU RESPOND TO THESE
2 CONCERNS?

3

4 A. Mr. Fury does not give any specifics about the general observations he
5 makes. He states that NewSouth will more fully address these issues in
6 the workshop/comment phase of the 3rd Party Test. BellSouth would be
7 glad to investigate further Mr. Fury's and NewSouth's concerns if they will
8 provide the information identifying occurrences. Such unsupported
9 generalized statements provide no basis to assess BellSouth's
10 performance.

11

12 In regards to the four measures that Mr. Fury briefly mentions, in Florida
13 for the month of May, BellSouth was in Parity for FOC Timeliness for all
14 Mechanized Resale Products and 8 out of 11 Mechanized UNE Products.
15 BellSouth was in parity for all Resale and 11 out of 13 UNE products for %
16 Jeopardies Mechanized Orders Metric. Additionally, BellSouth was in
17 Parity for 16 out of 19 Resale and 23 out of 25 UNE Products for the %
18 Missed Installation Appointments Measure. Finally, for the % Provisioning
19 Troubles within 30 Days measure in May BellSouth was in parity for 12 out
20 of 15 Resale Products and 18 out of 22 UNE Products. Consequently the
21 data does not support Mr. Fury's extreme claims of performance
22 deficiencies.

23

24 **NUVOX WITNESS - MS. MARY CAMPBELL**

25

1 Q. IN MS. CAMPBELL'S TESTIMONY SHE ALLEGES PROBLEMS THAT
2 NUVOX HAD OBTAINING ALEC-SPECIFIC METRICS RESULTS AND
3 REGIONAL FLOW-THROUGH REPORTS FROM BELLSOUTH. CAN
4 YOU ADDRESS THESE ISSUES?

5
6 A. Yes. NuVox's original predecessor is State Communications, which
7 became TriVergent Communications in 2000. Gabriel Communications
8 and TriVergent Communications merged in November 2000 and chose
9 the new company name of NuVox in February 2001. At this time
10 BellSouth has multiple contracts for the various individual companies,
11 which now comprise NuVox and has not been formally notified regarding
12 NuVox's desire to consolidate the reporting structure following its recent
13 merger and acquisition activity. BellSouth has an individual contract with
14 TriVergent, which was previously known as StateComm, and an additional
15 contract with Gabriel Communications only for the state of Kentucky.

16
17 Having gone through a series of mergers and acquisitions, NuVox's
18 combination of predecessor companies include at least seven OCNs and
19 currently have multiple wholesale customer IDs. The OCNs used by each
20 company must be mapped to the same wholesale customer id to view the
21 raw data under a single user id on the PMAP website. As NuVox knows,
22 they have to advise BellSouth of their desire to consolidate data and
23 provide the necessary information. However, NuVox has not done so.

24
25 Additionally, each individual OCN requires a separate key to read the

1 Flow-Through reports. In the case of NuVox that was recently involved in
2 merger and acquisition activity, the process for updating the databases
3 required to report all OCNs under a single wholesale customer id has not
4 been completed, resulting in NuVox's inability to view all of its data using a
5 single PMAP website user ID. Having had this recently brought to our
6 attention by NuVox, we are now working to correct the problem. This
7 includes:

8 1) Placing all seven NuVox OCNs (8672, 2505, 2506, 2620, 2621,
9 3799, and 4890) under one WHOLESale CUSTOMER ID to allow
10 viewing of all NuVox data on the PMAP Website through a single
11 user id. Had NuVox requested the consolidation, BellSouth would
12 have done this before now,

13
14 2) Since NuVox has finally identified their OCN's, BellSouth is
15 providing NuVox with all keys required to read the Flow-Through
16 Reports for all NuVox OCNs.

17
18 Q. ON PAGES 3-4 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT
19 NUVOX WAS GIVEN ONE USER IDENTIFICATION AND PASSWORD
20 TO ACCESS NUVOX'S DATA. SHE WAS TOLD THAT ALL RELEVANT
21 OCNS (8672, 2505 AND 2620) WOULD BE LISTED UNDER
22 STATECOMM, HOWEVER ONLY ONE OCN (8672) WAS LISTED.
23 PLEASE ADDRESS?

24
25 A. NuVox only requested one User ID and there apparently was a

1 misunderstanding regarding what she was told. BellSouth did not know
2 that these other OCNs applied to StateComm and could not have told Ms.
3 Campbell that they were all reflected. Because NuVox now has several
4 OCNs coming from what was originally three separate companies
5 (StateComm, TriVergent, and Gabriel), all OCNs need to be under one
6 Wholesale Customer ID to have each OCNs information available to be
7 viewed under one PMAP user id, in this case, STATECOMM. However,
8 NuVox has not yet requested these OCN-to-Wholesale Customer ID links
9 and, as a result, NuVox only sees the raw data for one of the seven
10 OCNs, 8672. The PMAP results reports in fact do contain all active
11 NuVox OCNs (8672 & 2505) with data. We expect to fix this problem to
12 enable NuVox to see all relevant PMAP raw data for July data.

13

14 Additionally, StateComm OCN 2620 appears to be a specialty account in
15 BellSouth's ALEC database because there is no signed contract with
16 StateComm for that particular OCN. NuVox's recent merger and
17 acquisition activity has resulted in a number of questions for BellSouth on
18 the reporting consolidation and preferences for NuVox. BellSouth is
19 currently working to resolve these issues with NuVox.

20

21 Q. ON PAGE 4, MS. CAMPBELL ALLEGES A DISCREPANCY BETWEEN
22 THE VOLUME OF LSRS THEY SUBMITTED IN APRIL 2001 VS THE
23 NUMBER OF LSRS SHOWING IN NUVOX'S RECORDS.
24 SPECIFICALLY, BELLSOUTH'S COUNT IN APRIL IS 1,942 AND NUVOX
25 SAYS THEY SUBMITTED 616. PLEASE ADDRESS?

1

2 A. The 1,942 LSRs reported by BellSouth for NuVox are under OCN 8672,
3 StateComm. This does not include the 35 LSRS for TriVergent, OCN
4 2505. NuVox, only requested the key for OCN 2505. They did not
5 request the Flow-Through Key for StateComm, so BellSouth did not know
6 that it should provide NuVox with that key. Without the key for OCN 8672,
7 NuVox would not have been able to accurately view that data at the time.
8 If NuVox alleges further LSR volume discrepancies on the 1,942 LSRs for
9 OCN 8672 and 35 LSRs for OCN 2505, additional verification will be
10 required. The PONs for the 616 LSRs stated by NuVox would be required
11 to conduct any further investigation. Unfortunately, NuVox did not provide
12 the listing of PONs from their internal records for the 616 LSRs to permit
13 such investigation.

14

15 Q. ON PAGE 5 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT NONE
16 OF NUVOX'S PONS WERE FOUND IN BELLSOUTH'S RAW DATA
17 FILES FOR O-7 PERCENT REJECTED SERVICE REQUESTS FOR
18 APRIL 2001. PLEASE EXPLAIN.

19

20 A. StateComm (OCN 8672) and TriVergent (OCN 2505) currently do not
21 have the same Wholesale Customer ID allowing the two companies to be
22 linked in the BellSouth database. As a result, Ms. Campbell would not
23 have the ability to view any PONs for OCN 2505 (TriVergent) in raw data if
24 she was logged into the PMAP website using her STATECOMM user id
25 and password as she stated in her testimony on page 2. Although NuVox

1 is unable to view both StateComm and TriVergent's raw data, NuVox is
2 able to view the PMAP reports in PMAP for both StateComm (OCN 8672)
3 and TriVergent (OCN 2505) since PMAP results reports do not require
4 that multiple OCNs have the same Wholesale Customer ID.

5
6 According to BellSouth's raw data files for O-7: Percent Rejected Service
7 Requests for April 2001, NuVox did in fact have PONs for both TriVergent
8 (OCN 2505) and StateComm (OCN 8672).

9
10 Q. ON PAGE 4 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT
11 NUVOX IS NOT GETTING A COMPLETE SET OF KEYS SO THAT
12 THEY ARE ABLE TO LOOK UP ALL RELATED DATA IN THE FLOW-
13 THROUGH REPORT. WHY IS THIS?

14
15 A. BellSouth accurately provided Ms. Campbell with the Flow-Through
16 Report key for the company that she requested, TriVergent (OCN 2505).
17 Ms. Campbell failed to request the Flow-Through Report Key for
18 StateComm (OCN 8672). For the April 2001 Flow-Through Report,
19 BellSouth only provided NuVox with the TriVergent (OCN 2505) key as
20 Ms. Campbell requested. For security reasons, BellSouth only distributes
21 Flow-Through Report keys when the key is requested by the ALEC. Keys
22 are distributed based on the specific OCNs requested by the ALEC.
23 Without the request for a Flow-Through Report Key for OCN 8672 from
24 Ms. Campbell, she would not have been able to view all of NuVox's data.
25 There were no Flow-Through Report keys or data for Gabriel

1 Communications or other OCNs for StateComm in April 2001. Again, the
2 merger and acquisition activity surrounding NuVox and the specific nature
3 of Ms. Campbell's request has prevented NuVox from receiving all
4 relevant data.

5
6 **Q. ON PAGE 4 OF HER TESTIMONY, MS. CAMPBELL NOTES THAT ALL
7 DATA ON THE PMAP WEBSITE IS IDENTIFIED AS STATECOMM 8672.
8 IS THIS CORRECT?**

9
10 **A. No. Ms. Campbell is mistaken. In the PMAP results reports, NuVox's data
11 appears under the name "STATECOMM" for two OCNS – StateComm
12 (OCN 8672) and TriVergent (OCN 2505). Ms. Campbell must be referring
13 to the raw data on the PMAP website which only contains StateComm
14 (OCN 8672). As previously discussed, the Wholesale Customer IDs are
15 not linked for all NuVox OCNs causing NuVox to only view OCN 8672 in
16 the raw data on the PMAP Website. Had NuVox informed BellSouth on
17 the specific OCNs that should be consolidated for ALEC reporting
18 purposes based on the recent merger and acquisition. BellSouth would
19 have updated the necessary databases to reflect the changes and enable
20 NuVox to view all of their data.**

21
22 **Q. ON PAGES 5-6 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT
23 THE FLOW-THROUGH REPORT FOR APRIL 2001 WAS INCOMPLETE,
24 REFLECTING ONLY A FRACTION OF THE ORDERS SUBMITTED BY
25 NUVOX AND NONE OF THE ORDERS FOR UNES AND RELATED**

1 SERVICES SUBMITTED UNDER OCN 2505 WERE INCLUDED.

2 PLEASE EXPLAIN.

3

4 A. Once again, this problem was caused by NuVox actions regarding OCN's.
5 The April 2001 Flow-Through Report is complete and contains all orders
6 submitted by NuVox, under OCN 2505 including UNEs. BellSouth
7 provided NuVox with the April Flow-Through keys for OCN 2505
8 (TriVergent) on June 20, 2001, as they requested, and the UNE orders are
9 appropriately reflected in this report. TriVergent OCN 2505 submitted a
10 total of 35 UNE LSRs via BellSouth's electronic interfaces in April. NuVox
11 did not request the key for OCN 8672, StateComm, which had 1,942 LSRs
12 submitted under that particular OCN. Without Flow-Through Report Keys
13 for OCN 2505 and 8672, NuVox would not have been able to view all of
14 the orders they submitted.

15

16 Q. ON PAGE 6, MS. CAMPBELL CLAIMS THAT BELLSOUTH TOLD
17 NUVOX THERE WERE NO PMAP REPORTS SHOWING OCN 2505 IN
18 APRIL 2001. WHY IS THIS?

19

20 A. BellSouth cannot pull up prior ALEC specific PMAP website screens once
21 new data is posted. Data for OCN 2505 (TriVergent) did appear under the
22 name "STATECOMM" in the May 2001 PMAP Results Reports. If there
23 was a previous problem, it has now been corrected.

24

25 Q. ON PAGE 6 OF HER TESTIMONY, MS. CAMPBELL SAYS THAT THE

1 PMAP REPORTS ONLY INCLUDE DATA ON NUVOX'S RESALE
2 BUSINESS. PLEASE EXPLAIN.

3
4 A. Ms. Campbell is wrong. The BellSouth PMAP reports do include all
5 aspects of NuVox's business. As a result of NuVox's recent merger and
6 acquisitions and having multiple OCNs that are currently not linked, the
7 raw data on the PMAP website only displays data under OCN 8672,
8 StateComm. Since NuVox's UNE and LNP business all falls under OCN
9 2505 (TriVergent) and not OCN 8672, NuVox would not be able to
10 currently view this data in the raw data found on the PMAP website under
11 their current User ID because OCN 2505 is not currently linked to
12 StateComm. NuVox should inform BellSouth on the specific OCNs that
13 should be consolidated for ALEC reporting purposes based on the recent
14 merger and acquisition. BellSouth would then have the ability to update
15 the necessary databases to reflect the changes and enable NuVox to view
16 all of their raw data on the PMAP website.

17
18 Q. ON PAGES 7-8, MS. CAMPBELL ASSERTS THAT THERE IS A
19 DISCREPANCY BETWEEN NUVOX'S EDI INTERFACE RECORDS OF
20 3180 LSRS, BELLSOUTH'S SERVICE ORDER REPORT THAT
21 INCLUDED 250 NUVOX LSRS SUBMITTED VIA EDI AND
22 BELLSOUTH'S MISCELLANEOUS AGGREGATE % FLOW-THROUGH
23 DETAIL REPORT OF 254 NUVOX LSRS FOR MAY 2001. CAN YOU
24 PLEASE EXPLAIN THIS?

25

1 A. Yes. Although Ms. Campbell's question is somewhat unclear, I believe she
2 has inappropriately limited her search for NuVox PONs in BellSouth's
3 Flow-Through reports and raw data files. First, let's address the NuVox
4 LSRs in BellSouth Miscellaneous Aggregate % Flow-Through Detail
5 Report. By screening across three NuVox OCNs (2505, 8672, 4890), all
6 three mechanized interfaces, and both the LNP and non-LNP Flow-
7 Through reports, BellSouth identified 253 non-LNP LSRs and 667 LNP
8 LSRs submitted via EDI, 2,158 non-LNP LSRs submitted via LENS, and 2
9 non-LNP LSRs submitted via TAG. This is a total of 3,080 valid NuVox
10 LSRs processed by BellSouth in the month of May. Ms. Campbell may
11 have inappropriately assumed that all NuVox LSRs were submitted via the
12 EDI gateway interface during the month of May.

13
14 In addition, these Flow-Through reports indicate that BellSouth returned a
15 total 111 non-LNP fatal rejects and 316 LNP fatal rejects to NuVox in May.
16 Without knowing exactly how NuVox is counting its LSRs, I cannot
17 determine how many (if any) fatal rejects might be included in Ms.
18 Campbell's total of 3,180 submitted.

19
20 Q. ON PAGE 8, MS. CAMPBELL STATES THAT THERE IS A
21 DISCREPANCY AMONG BELLSOUTH'S "ORDERING: FATAL
22 REJECTS" RAW DATA FILE OF 222 FATAL REJECETS FOR NUVOX,
23 BELLSOUTH'S MISCELLANEOUS AGGREGATE % FLOW-THROUGH
24 DETAIL REPORT OF 111 FATAL REJECTS AND NUVOX'S OWN
25 RECORDS OF 271 FATAL REJECTS. CAN YOU PLEASE EXPLAIN

1 THIS?

2 A. NuVox states that they received 271 fatal rejects but neglected to provide
3 PONs, state whether the orders were LNP or non-LNP, which interface, or
4 for which of NuVox's seven OCNs. NuVox compared their internal count
5 of 271 fatal rejects to BellSouth's "Ordering:Fatal Rejects" Report and
6 Miscellaneous Aggregate % Flow-Through Detail Report fatal rejects
7 count for non-LNP orders. Without any additional information provided by
8 NuVox on their internal count of 271 fatal rejects, BellSouth cannot
9 properly compare this total to our records. BellSouth's LNP Flow-Through
10 Report does indicate 316 fatal rejects for OCN 2505.

11

12

13 **XO FLORIDA WITNESS – ELINA PADFIELD**

14

15 Q. ON PAGE 4, MS. PADFIELD ASSERTS THAT BELLSOUTH FAILED TO
16 PAY THE TOTAL AMOUNT OF REMEDY PAYMENTS AS REQUIRED
17 BY PARIS DATA ON THE PMAP WEBSITE, INDICATING
18 OVERSTATEMENT OF BST PERFORMANCE ON PMAP.FOR THE
19 MONTH OF APRIL 2001. BELLSOUTH'S PMAP WEBSITE SHOWED A
20 TOTAL PAYMENT DUE XO OF \$6,360. HOWEVER, XO RECEIVED A
21 CHECK FROM BELLSOUTH IN JUNE FOR \$134,179.16 FOR APRIL.
22 PLEASE EXPLAIN THE DISCREPANCY.

23

24 A. This allegation refers to penalties in Georgia, not performance in Florida.
25 There is not an actual discrepancy in the amount f money XO

1 Communications received in June. There have been updates to the
2 measures via Georgia that has led to adjustments in penalty payments.
3 For March Data, BellSouth had an adjustment penalty amount of
4 \$5,635.80 due to XO Communications. For April Data, BellSouth had a
5 payment amount to XSO of \$128,543.36. These two amounts totaled
6 \$134,179. 16, which was the total amount of March Data adjustments plus
7 April Data payments that were delivered to XO Communications in June.

8
9 XO Communications can contact their ALEC Interface Group
10 representative if they have questions regarding the dollar amount received
11 and BellSouth will explain the breakdown of penalty amounts.

12
13 Q. IN ADDITION, MS. PADFIELD ASSERTS THAT FURTHER
14 DISCREPANCIES HAVE CONTINUED IN THE MONTH OF MAY. THE
15 PMAP WEBSITE REPORTED A TOTAL OF \$480,260 IN PENALTIES
16 DUE XO FROM BELLSOUTH FOR MISSED PERFORMANCE
17 BENCHMARKS. HOWEVER, BELLSOUTH HAS TOLD XO THAT IT WILL
18 BE RECEIVING A PAYMENT OF \$31,000 FOR MAY. PLEASE EXPLAIN.

19
20 A. This is another Georgia penalty allegation. The primary difference of
21 these numbers is due to the LNP Average Disconnect Timeliness
22 Measure. The Georgia Commission had these payments placed in
23 escrow and ordered reporting on three additional LNP metrics and a
24 modified version of the LNP Average Disconnect Timeliness metric.

25

1 Q. MS. PADFIELD ASSERTS THAT BELLSOUTH'S PMAP WEBSITE
2 SHOWS THAT BELLSOUTH MET THE BENCHMARK FOR THE MAY
3 LNP-AVERAGE DISCONNECT TIMELINESS ONLY 3.72% OF THE
4 TIME. HOW DO YOU RESPOND?

5

6 A. As previously discussed, the LNP Average Disconnect Timeliness
7 Measure is flawed and provides no useful information. The Georgia
8 Commission has recognized the flaws. The LNP Average Disconnect
9 Timeliness Metric as currently defined in the Interim Florida SQM, does
10 not accurately capture the end user experience when the telephone
11 number is ported and includes activities in the porting process over which
12 BellSouth has no control. Additionally, this measure is meaningless to the
13 end user and should not be reviewed and analyzed as a meaningful
14 measure.

15

16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17

18 A. Yes.

19