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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF CLAUDE P. MORTON
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 001097-TP
FEBRUARY 8, 2002

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. (HEREINAFTER REFERRED TO AS "BELLSOUTH" OR "THE COMPANY").

A. My name is Claude P. Morton. I am employed by BellSouth as a Senior Staff Manager in the Interconnection Billing and Collections Department. My business address is 3535 Colonnade Parkway, Birmingham, Alabama 35243.

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. I currently have responsibilities of supervising the line and staff groups ("line" employees interact with customers; "staff" employees support "line" employees) which handle accounts receivable management, including collections and billing disputes, for all of the Company's interconnection business.

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1 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND
2 CAREER EXPERIENCE.

3

4 A. I received a Bachelor of Arts degree in English from Brescia University
5 in Owensboro, Kentucky in 1969. I received a Master of Arts degree in
6 English from Western Illinois University in 1970. I received a Master of
7 Business Administration degree from the Amos B. Tuck School at
8 Dartmouth College in Hanover, New Hampshire in 1987. I began
9 employment at BellSouth in June, 1973, and have held various
10 positions in Consumer Operations, Marketing, and International
11 Operations before assuming my current responsibilities in
12 Interconnection Billing and Collections.

13

14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15

16 A. The purpose of my testimony is to address BellSouth's position on the
17 billing disputes Supra has raised under the 1997 BellSouth/Supra
18 interconnection and resale agreements. Specifically, I will address the
19 following issues:

20

- 21 • The Supra account make-up,
- 22
- 23 • How accounts are established,

24

25

1 • How BellSouth knows under which account to provide
2 service, and

3

4 • Types of services Supra ordered under these accounts.

5

6 **Issue 1: Should the rates and charges contained (or not contained) in**
7 **the 1997 AT&T/BellSouth Agreement apply to the BellSouth bills at**
8 **issue in this Docket?**

9

10 Q. HOW MANY ACCOUNTS COMPRISE THE SUPRA ACCOUNT?

11

12 A. Supra currently has six accounts with BellSouth. Three of these are
13 resale accounts that were established in July, 1997. The three other
14 accounts are UNE accounts that were not established until February,
15 2000.

16

17 Q. HOW ARE ACCOUNTS ESTABLISHED?

18

19 A. Requests for account establishment come to BellSouth from the
20 customer, usually through the salesperson. In order to establish an
21 account, a customer must provide certain information to BellSouth.
22 The required documentation includes proof of PSC certification, a
23 blanket letter of authorization, operating company number (OCN),
24 CLEC contact number form, contract, Carrier Identification Code, credit
25 rating and an account application. BellSouth does not establish an

1 account unless there is prior approval from the Credit Group – a
2 function of the Interconnection Finance organization. There is a
3 standard process for handling requests for new accounts.

4
5 The account application is completed by the customer, and the
6 customer identifies the states in which he wishes to do business. A
7 separate account must be established for each state and for each type
8 of operation -- reseller or facilities based carrier (UNEs). Copies of the
9 two applications BellSouth received from Supra are attached as Exhibit
10 CPM-1. Each account is identified by a Billing Telephone Number
11 (BTN) assigned by BellSouth.

12
13 Q. HOW DOES BELLSOUTH KNOW UNDER WHICH ACCOUNT TO
14 PROVIDE SERVICE?

15
16 A. The customer provides BellSouth the appropriate account or BTN
17 (either a resale or UNE account) to which to bill the service being
18 added. In most instances, the CLEC has an option to place their own
19 orders into BellSouth's systems through an electronic interface or to
20 submit their request on paper. A copy of the billing portion of an order
21 submitted electronically by Supra is attached as Exhibit CPM-2. As can
22 be seen in this Exhibit, Supra provided the Billing Telephone Number
23 (BTN) to which the service is to be added. The specific BTN in this
24 exhibit is associated with a resale account.

25

1 Q. WHAT TYPE OF SERVICES DID SUPRA ORDER UNDER THESE
2 ACCOUNTS?

3

4 A. Under the resale accounts established in July, 1997, Supra solely
5 ordered resale services. These resale services included services such
6 as residential and business lines, Call Waiting, Caller ID, 3-Way
7 Calling, Memory Call® service, Call Block, and Call Forwarding.

8

9 Under the three accounts established in February, 2000, Supra began
10 ordering Unbundled Network Elements (UNEs) in March, 2000. Supra
11 ordered UNES such as Unbundled Exchange Ports, Unbundled Loop
12 Voice Grade, Memory Call® service, Call Forwarding, Hunting Rollover
13 Service, 3-way calling, Call Waiting, Call Return, Caller ID.

14

15 Supra did not order UNEs until March, 2000. Supra has ordered and
16 continues to order resale services under their resale account that was
17 established in July, 1997.

18

19 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

20

21 A. Yes.

22

23

24

25

BELLSOUTH MASTER ACCOUNT APPLICATION

COMPETITIVE LOCAL EXCHANGE COMPANY

Date 07/07/97

ACCOUNT INFORMATION

Reseller Facilities Based Carrier Tax Exempt _____ Tax Code _____ State FL.

Certificates of Authority Attached Yes No Estimated Average Monthly Bill _____

Company Name/Operating Company Number SUPRA TELECOMMUNICATIONS & INFO. SYSTEMS (7011)

Local Address 269 GIRALDA AVENUE, SUITE 203

City CORAL GABLES State FL. ZIP 33134

Corporate Address 269 GIRALDA AVE, SUITE 203

City CORAL GABLES State FL. ZIP 33134

Billing Address 269 GIRALDA AVE, SUITE 203

City CORAL GABLES State FL. ZIP 33134

Contact Name & Telephone # for:

Billing MAY AMOS Telephone # (305) 443-3710 X 220

Orders JOSHUA Telephone # (305) 443-3710 X 24

Other A.J. GONZALEZ Telephone # (305) 443-3710 X 23

CREDIT INFORMATION

Previous BellSouth Service Telephone # (305) 234-5392 Last Date of Service 1/1 STILL IN

Yes No Telephone # (305) 234-5864 Last Date of Service 1/1 SERVIC

Other Current BellSouth Service Telephone # (305) 443-3710

Yes No Telephone # (305) 443-1078

Ownership

Individual Partnership
Name _____ Tel # (____) _____ SSN _____

Name _____ Tel # (____) _____ SSN _____

Name _____ Tel # (____) _____ SSN _____

Name _____ Tel # (____) _____ SSN _____

Corporation
President O. A. Ramos Tel # (305) 443-3710 SSN _____

Vice-President Z. Ramos Tel # (305) 740-8123 SSN _____

Secretary A. Olasewere Tel # (305) 669-4472 SSN _____

Treasurer _____ Tel # (____) _____ SSN _____

Have you been informed concerning BellSouth's Line Information DataBase (LIDB) contract? Yes No

Have you signed a LIDB contract? Yes No

Note: Checking "NO" indicates that the CLEC is aware of the consequences of declining, i.e., that BellSouth can not guarantee processing or restriction of LIDB handled calls.

BELLSOUTH MASTER ACCOUNT APPLICATION

COMPETITIVE LOCAL EXCHANGE COMPANY

Date 02/24/00

ACCOUNT INFORMATION

Reseller Facilities Based Carrier Tax Exempt YES Tax Code CS-04688554 FLORIDA

Certificate of Authority Attached Yes No Estimated Average Monthly Bill _____

Company Name/Accounting Company Number SUPRA TELECOM

Local Address 2620 SW 27 AVENUE

City MIAMI State FL ZIP 33133

Corporate Address SAME AS ABOVE

City _____ State _____ ZIP _____

Billing Address SAME AS ABOVE

City _____ State _____ ZIP _____

Contact Name & Telephone #s:
 Billing VICTOR MIRIKI Telephone # (305) 476-4250
 Orders VICTOR MIRIKI Telephone # (305) 476-4250
 Other DAVE NILSON Telephone # (305) 476-4202

CREDIT INFORMATION

Previous Bellsouth Service Telephone # () _____ Last Date of Service 1/1
 Yes No Telephone # () _____ Last Date of Service 1/1

Other Current Bellsouth Service Telephone # (305) 9822-670
 Yes No Telephone # (561) 9822-670
904 9822 670

Ownership
 Individual Partnership
 Name _____ Tel# () _____ SSN _____

Name _____ Tel# () _____ SSN _____

Name _____ Tel# () _____ SSN _____

Name _____ Tel# () _____ SSN _____

Corporation
 President KAMDS OLUKAYODE Tel# (305) 476-4220 SSN _____

Vice-President BENTLEY CAROL Tel# (305) 476-4294 SSN _____

Secretary OLASHERE ABDUL Tel# (305) 476-4260 SSN _____

Treasurer EMMANUEL DANSO Tel# (305) 476-4204 SSN _____

Have you been informed concerning Bellsouth's Line Information Database (LIDB) contract? Yes No
 Have you signed a LIDB contract? Yes No

Note: Checking "NO" indicates that the CLEC is aware of the consequences of declining, i.e., that Bellsouth can not guarantee processing or restriction of LIDB handled calls.

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BY_1	305Q822670670	
BY_2		
END		
BILLNM	STIS, INC	
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TE		
EBP		
BILLNM STREET	2620 S W 27TH AVE	
BILLNM CITY	MIAMI	
BILLNM ST	FL	
BILLNM ZIP	33133	
BILLNM FLOOR		
BILLNM ROOM		
BILLCOM	BRAD HAMILTON	
BILLCOM TELE	3054433710	

Command ==> Scroll ==>
 F1=Help F3=Exit F5=Rfind F12=Cancel

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