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July 1, 2002

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Mrs. Blanca S. Bayó
Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 020129-TP (CCS7 Tariff)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of W. Keith Milner and John A. Ruscilli, which we ask that you file in the captioned docket.

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 shown on the attached Certificate of Service.

Sincerely,

Patrick W. Turner
(11A)
Patrick W. Turner

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

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Milner
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**CERTIFICATE OF SERVICE
DOCKET NO. 020129-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
(*) Hand Delivery, Electronic Mail and First Class U.S. Mail this 1st day of July 2002 to
the following:

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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 020129-TP
JULY 1, 2002

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

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Assistant Vice President - Interconnection Operations for BellSouth. I have served in my present role since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 32 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development laboratory. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

1 I graduated from Fayetteville Technical Institute in Fayetteville, North
2 Carolina in 1970, with an Associate of Applied Science in Business
3 Administration degree. I obtained a Master of Business Administration
4 degree from Georgia State University in 1992.

5
6 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
7 SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE
8 SUBJECT OF YOUR TESTIMONY.

9
10 A. Yes. I testified before the state Public Service Commissions in
11 Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, South
12 Carolina, the Tennessee Regulatory Authority, and the Utilities
13 Commission in North Carolina on the issues of technical capabilities of
14 the switching and facilities network regarding the introduction of new
15 service offerings, expanded calling areas, unbundling, and network
16 interconnection.

17
18 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
19 TODAY?

20
21 A. In my testimony, I will address the technical aspects of network related
22 issues, which have been raised in the Joint Petition Objecting To and
23 Requesting Suspension of Proposed CCS7 Access Arrangement Tariff
24 filed by US LEC of Florida, Inc., Time Warner Telephone of Florida, LP
25 and ITC^DeltaCom Communications (the "Petitioners") in this docket.

1 Those are, in whole or in part, Issues 2, 6 and 7.

2

3 Q. WHAT IS CCS7?

4

5 A. The term “CCS7” is a reference to the use of Common Channel
6 Signaling (“CCS”) via the Signaling System 7 (“SS7”) protocol.
7 As used in the context of telecommunications systems, signaling is the
8 exchange of control information between elements of a
9 telecommunications network. Such information includes supervisory
10 signaling used to initiate and terminate connections and to indicate
11 status, general-purpose information transactions, and network
12 management. Common Channel Signaling (“CCS”) is a signaling
13 method in which the signals are no longer carried over the
14 circuits/channels traditionally used to carry voice traffic once
15 connections are established (as is done with inband analog signaling,
16 for example). Instead, a separate shared (common) channel (signaling
17 link) is used to convey the signaling information. Signaling System 7
18 (“SS7”) is the latest protocol in use for signaling among switches and
19 databases.

20

21 Q. WHAT ARE THE TYPES OF MESSAGES THAT TRANSMIT
22 SIGNALING INFORMATION BETWEEN THE SWITCHES AND THE
23 DATABASES?

24

25 A. There are two types of messages that are pertinent to this proceeding

1 that convey the signaling information: the Integrated Service Digital
2 Network User Part ("ISUP") messages and the Transaction
3 Capabilities Application Part ("TCAP") messages.

4
5 Q. WHAT ARE ISUP MESSAGES?

6
7 A. The ISUP is one form of CCS7 message that provides connection-
8 related services for control of both ISDN and non-ISDN circuits. These
9 include control of digital and analog circuit-switched network
10 connections between switches, as well as the provision of related
11 services such as calling-party and called-party identification, call
12 redirection, and operator services. ISUP also provides some network
13 management capabilities for control of the ISDN interoffice network.
14 The network management capabilities include allowing one exchange
15 to block calls on a trunk or trunk group basis (in case of failure, for
16 example) and detecting and releasing call setup attempts requiring an
17 excessive number of trunks (due to routing table errors, for example).

18
19 Q. WHAT ARE TCAP MESSAGES?

20
21 A. TCAP messages support non-circuit-related information transfer
22 between switches. TCAP messages support services requiring
23 transactions among switches and databases, such as number
24 translation and billing verification.

25

1 **Issue 2: Did BellSouth provide CCS7 access service to ALECs, IXCs,**
2 **and other carriers prior to filing its CCS7 Tariff?**

3

4 Q. IS THIS A NEW SERVICE BELLSOUTH IS PROVIDING WITH THIS
5 TARIFF FILING?

6

7 A. BellSouth currently provides CCS7 access service to Alternative Local
8 Exchange Carriers ("ALECs"), Interexchange Carriers ("IXCs"),
9 Independent Companies, Wireless Carriers, etc., and has been doing
10 so for a number of years. Until recently, however, BellSouth has been
11 unable to count individual ISUP and TCAP messages that are
12 transported by BellSouth for another carrier. Thus, until BellSouth
13 developed the ability to count such messages, BellSouth was unable
14 to bill third parties on a per message basis for this service that it was
15 providing them.

16

17 Q. WHY IS BELLSOUTH FILING THIS NEW TARIFF?

18

19 A. This tariff is simply a change in the method of charging for CCS7
20 usage of BellSouth's CCS7 network by more accurately charging
21 carriers based on their usage. To date, the per message charge for
22 the service has been zero. Now, BellSouth is charging on a per
23 message basis for this service that it is providing to third parties.

24

25

1 **Issue 6: Is more than one carrier billed for Integrated Services Digital**
2 **Network User Part (“ISUP”), for the same segment of any given call,**
3 **under the BellSouth CCS7 Access Arrangement Tariff? If so, is it**
4 **appropriate?**

5

6 Q. IS EACH CARRIER THAT MAKES USE OF ISUP BILLED FOR THE
7 SERVICES BELLSOUTH PROVIDES?

8

9 A. Yes. The CCS7 Access Arrangement Tariff provides for billing when
10 BellSouth’s CCS7 network is involved in call set up. Since multiple
11 carriers can be involved in the set up of a call, each carrier would be
12 billed accordingly for any use it makes of BellSouth’s CCS7 network.

13

14 While BellSouth may bill an IXC for some of the messages involved in
15 a call and may bill an ALEC for other messages involved in the same
16 call, only one entity is billed for a particular CCS7 message involved in
17 a call. Accordingly, an IXC and an ALEC will not be billed for the same
18 message, and there is no double billing.

19

20 Q. WHY IS IT APPROPRIATE TO BILL EACH CARRIER THAT
21 UTILIZES BELLSOUTH’S CCS7 NETWORK?

22

23 A. This approach is appropriate because each carrier would be billed for
24 its use of BellSouth’s CCS7 network. In the alternative, not billing all
25 carriers appropriately for their usage would result in disparate

1 treatment for some carriers.

2

3 **Issue 7: Under BellSouth's CCS7 Access Arrangement Tariff, is**
4 **BellSouth billing ISUP and Transactional Capabilities Application Part**
5 **("TCAP") messages charges for calls that originate on an ALEC's**
6 **network and terminate on BellSouth's network? If so, is it appropriate?**

7

8 Q. IS THE DIRECTION OF A CALL BETWEEN AN ALEC'S NETWORK
9 AND BELLSOUTH'S NETWORK RELEVANT IN TERMS OF BILLING
10 FOR THE USE OF BELLSOUTH'S CCS7 NETWORK?

11

12 A. No. The BellSouth CCS7 Access Arrangement bills for usage of the
13 BellSouth's CCS7 network regardless of which direction CCS7
14 messages are sent. Stated another way, regardless of whether the
15 call originates or terminates on the ALEC's network, the ALEC would
16 be charged for use of BellSouth's CCS7 network.

17

18 Q. WHY IS IT APPROPRIATE FOR BELLSOUTH TO BILL A CARRIER
19 FOR MESSAGES THAT BOTH ORIGINATE FROM AND TERMINATE
20 TO THAT CARRIER?

21

22 A. Since the carrier is using BellSouth's CCS7 network when CCS7
23 messages are sent in either direction, it is appropriate to bill for each
24 use of the network, regardless of the direction of the query.

25

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2 -

3 A. Yes.