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July 29, 2002

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COMMISSION  
CLERK

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: Joint Petition of US LEC of Florida, Inc., Time Warner Telecom of Florida, LP and ITC^DeltaCom, Communications objecting to and requesting suspension of proposed CCS7 Access Arrangement Tariff filed by BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of W. Keith Milner, John A. Ruscilli, Clyde L. Greene, Gregory R. Follensbee and Thomas Randklev, 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 a copy to me. Copies have been served to the parties shown on the attached certificate of service.

Sincerely,

*Patrick W. Turner*  
Patrick W. Turner (LA)

Enclosures

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

0792602 thru 07932-02

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*RLM*  
FPSC-BUREAU OF RECORDS

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mp-1  
FCL-1  
sec-1

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 29th day of July 2002 to the following:

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Patrick W. Turner (CA)

**(+) Signed Protective Agreement**

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BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL TESTIMONY OF CLYDE L. GREENE  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 020129-TP  
JULY 29, 2002

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

A. I am Clyde L. Greene, Room 28A1, 600 N. 19th St., Birmingham, AL 35203. My current position is Specialist, Wholesale Billing at BellSouth Billing, Inc., a wholly owned subsidiary of BellSouth Telecommunications, Inc. In that role, I am responsible for overseeing the implementation of various changes to BellSouth's Customer Records Information System ("CRIS") and Carrier Access Billing System ("CABS").

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from the University of Alabama at Birmingham with a Bachelor of Science Degree in Electrical Engineering in 1990. I began my career at BellSouth in July 1990 as an Administrative Assistant within the Network Department with responsibility for mechanized call testing and call recording trouble investigation. Since July 1994, I have served in various CABS support roles within the billing organization. I am familiar with the billing services

1 provided by BellSouth Telecommunications to local competitors,  
2 interexchange carriers and retail end user customers.

3

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

7

8 A. I have testified before the state public service commissions in Florida and  
9 Mississippi on issues regarding the capabilities of the systems used by  
10 BellSouth to bill for services provided to retail customers, IXC's and  
11 Competitive Local Exchange Carriers (CLECs).

12

13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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15 A. The purpose of my rebuttal testimony is to respond to certain portions of the  
16 direct testimony of Mr. Steve Brownworth filed on behalf of ITC^DeltaCom  
17 Communications, Inc. ("DeltaCom") and Ms. Wanda Montano filed on behalf  
18 of US LEC of Florida ("US LEC") with the Florida Public Service  
19 Commission ("Commission") on July 1, 2002.

20

21 Q. ON PAGE 11, LINES 4-12, MR. BROWNORTH STATES THAT  
22 DELTACOM IS UNABLE TO "PASS THE COSTS [OF SS7 USAGE]  
23 THROUGH TO OTHER CARRIERS" GIVEN THE FORMAT OF THE  
24 BILLING DELIVERED CURRENTLY BY BELLSOUTH. CAN  
25 BELLSOUTH DELIVER MORE DETAILED BILLING INFORMATION?

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A. No. At the present time, BellSouth does not have the ability to monitor signaling messages past a customer's directly connected signaling link. For this reason, it is not possible for BellSouth to provide any greater level of billing detail than the Originating Point Code ("OPC") and Destination Point Code ("DPC") information that it currently provides in relation to the link sets connected to the BellSouth signaling network. While providing certain additional information to ALECs and Third Party Providers of signaling services may be technically possible, there would be a substantial cost for developing such a service in software, hardware, coding, and capacity for BellSouth. Also, BellSouth would need very specific information about the customers in the ALEC's SS7 network—proprietary information that is not available to BellSouth. For these reasons, BellSouth currently cannot provide more detailed SS7 billing information.

Q. IT IS NOTED ON PAGE 14, LINES 11-22 OF MR. BROWNORTH'S TESTIMONY THAT BELLSOUTH PROVIDES A GREATER LEVEL OF BILLING DETAIL FOR ACCESS BILLING THAN FOR SS7 USAGE BILLING. WHY IS THERE A DIFFERENCE AND IS THAT REASONABLE?

A. While access billing and SS7 usage billing are both associated with the same overall service, they are not comparable from the billing perspective because the billing represents entirely different components.

1 As indicated in BellSouth's response to Item 6 of DeltaCom's Interrogatories,  
2 BellSouth does provide sufficient detail for the verification/auditing of all  
3 services being billed to carriers. BellSouth provides OPC and DPC  
4 information for all A-Links and B-Links attached to the BellSouth SS7  
5 Signaling Network. This billing is on a per message basis. The charges for  
6 this service are not impacted by the duration of use, and thus do not warrant  
7 maintaining the same level of detail associated with switched access billing.

8  
9 The billing records necessary for carrier access billing requires significantly  
10 more detail due to the nature of access billing requirements. BellSouth must  
11 create billing records for other entities and exchange those records with other  
12 entities as a result of equal access obligations. The detail recorded and the  
13 maintenance of these records is necessary because the billing of access cannot  
14 be segmented.

15  
16 BellSouth, therefore, maintains switched access AMA recordings in  
17 accordance with legal requirements of the State and Federal Tariffs and these  
18 records are subject to request in the settlement of disputes. BellSouth does not  
19 routinely provide the carriers with billing detail in the investigation of a dispute  
20 of access billing. Normally a comparison of summary information is adequate  
21 for the verification and/or audit of BellSouth's access billing.

22  
23 Access carriers generally prefer to make their own detail recordings that they  
24 use for the purpose of billing their end users.

25

1 BellSouth has, in the course of validating its access billing systems, agreed to  
2 detail comparisons for limited time segments on specific entities. These detail  
3 comparisons are cumbersome for all parties involved and are of little value.  
4 Summary comparisons have been more than adequate to validate BellSouth's  
5 processes.

6  
7 Finally, in contrast to billing for access services, the recording of call detail is  
8 not essential to the billing of SS7 service. As indicated previously, BellSouth  
9 does provide sufficient detail (OPC/DPC of the segment being billed and  
10 message count) for the verification of BellSouth per-message signaling billing.  
11 Since BellSouth is only billing for those SS7 messages that use the BellSouth  
12 segment of the SS7 Network, details associated with the completed telephone  
13 call are not pertinent to the process.

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15 Q. ON PAGE 7, LINES 18-22, AND THEN ON PAGE 8, LINE 1, MS.  
16 MONTANO SUGGESTS THAT BELLSOUTH HAS CREATED AN  
17 "INEQUITY" FOR ITS CUSTOMERS BY INITIATING SS7 USAGE  
18 BILLING WITHOUT "DEPLOYING THE NECESSARY SOFTWARE TO  
19 CAPTURE AND PASS SUFFICIENT INFORMATION FOR ANY THIRD  
20 PARTY...TO AUDIT THE CHARGES ASSESSED." CAN YOU RESPOND  
21 TO THIS COMMENT?

22  
23 A. Yes. As noted in response to Mr. Brownworth's similar statements above,  
24 BellSouth currently provides OPC and DPC information at the interconnected  
25 customer link set level. Any signaling that occurs beyond this level is not

1 “visible” to BellSouth, and based on the complexities noted earlier, BellSouth  
2 is not able to provide any greater level of detail. In the same way that  
3 BellSouth would not bill a customer’s end users—nor would the customer  
4 want BellSouth to do such—BellSouth is not going to bill a Third Party  
5 Provider’s signaling customers “on behalf of” the Third Party Provider. A  
6 Third Party Provider should record the necessary measurement data to bill its  
7 customers, since the information needed to do such billing resides with the  
8 Third Party Provider.

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10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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12 A. Yes.

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