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1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF THOMAS S. RANDKLEV
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 020129-TP
5 JULY 29, 2002
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH
8 TELECOMMUNICATIONS, INC. ("BELL SOUTH") AND YOUR
9 BUSINESS ADDRESS.

10
11 A. My name is Thomas S. Randklev. I am employed by BellSouth
12 Telecommunications, Inc. ("BellSouth") as a Product Manager, and CCS7 is
13 one of the products that is assigned to me. My business address is 675 West
14 Peachtree Street, Atlanta, Georgia 30375.

15
16 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

17
18 A. I received a Bachelor of Arts degree from the University of South Carolina in
19 1994 and I received a Masters of Business Administration from the University
20 of South Carolina in 1997. I joined BellSouth in June 2000 as a Product
21 Manager.

22
23 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

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25

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DECLASSIFIED PROPRIETARY

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

6
7 Q. ON PAGE 15, MR. BROWNORTH CLAIMS THAT "BELLSOUTH HAS
8 INDICATED THAT THEY WOULD CHARGE \$300,000 PER YEAR PER
9 COMPANY TO PROVIDE A MINIMUM LEVEL OF BILLING DETAIL."
10 ARE YOU ABLE TO ADDRESS THIS TESTIMONY?

11
12 A. Yes. I have had telephone conversations with Mr. Brownworth during which
13 we discussed, among other things: the extent to which BellSouth may be able
14 to provide additional billing-related information to DeltaCom, ALECs, or
15 third-party signaling providers with regard to ISUP and TCAP messages
16 addressed by the tariff that is the subject of this proceeding; the viability of
17 providing any such additional information; and the rates BellSouth might
18 charge for providing any such additional information.

19
20 Q. HOW DETAILED WERE THESE DISCUSSIONS?

21
22 A. Mr. Brownworth described the additional information that DeltaCom desired.
23 I agreed to look into whether it was possible for BellSouth to provide that
24 additional information and, if it was, to determine whether BellSouth would be
25 willing to develop the ability to collect that information and pass it along to

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1 DeltaCom and other carriers. I also agreed that if BellSouth was able and
2 willing to develop that ability, I would get some idea of what BellSouth might
3 charge for providing that additional information. My understanding was that
4 DeltaCom was exploring whether to develop this ability itself or purchase it
5 from BellSouth, assuming BellSouth was able and willing to offer it as a
6 service. We did not discuss technical details regarding how BellSouth could
7 obtain such additional information and pass it along to DeltaCom and other
8 carriers, and we never discussed in detail any rates that might apply if
9 BellSouth were to do so.

10

11 Q. IS THE "\$300,000 PER YEAR PER COMPANY" FIGURE MR.
12 BROWNORTH REFERENCES ON PAGE 15 OF HIS TESTIMONY
13 FAMILIAR TO YOU?

14

15 A. Yes. During the course of the discussions I just described, Mr. Brownworth
16 claimed that DeltaCom was losing \$30,000 per month because it was unable to
17 "pass through" per-message ISUP and TCAP charges to its carrier customers. I
18 did not ask Mr. Brownworth any questions about that figure – I was willing to
19 simply assume it for the purposes of our conversation. With that in mind, I
20 told Mr. Brownworth that even assuming BellSouth could provide the
21 additional information and that it would charge carriers \$300,000 per year to
22 do so, it seemed that DeltaCom would still come out ahead given the \$30,000
23 per month figure he quoted me. I simply used the \$300,000 figure as an
24 example – I never suggested that this was even close to being an accurate
25 estimate. To the contrary, as I explained above, I told Mr. Brownworth that if

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1 BellSouth was willing to develop the ability to provide the additional
2 information Mr. Brownworth mentioned, I would get some idea of what
3 BellSouth might charge for providing that additional information.

4

5 Q. HAS BELLSOUTH PROVIDED AN ESTIMATE WHAT IT MIGHT
6 CHARGE FOR PROVIDING THAT ADDITIONAL INFORMATION?

7

8 A. No. As BellSouth witness Mr. Clyde Green explains in his rebuttal testimony,
9 BellSouth is still in the process of determining how much of the requested
10 additional information it is even technically possible to provide and whether
11 BellSouth is willing to incur the costs of making the changes that would be
12 necessary to enable BellSouth to provide such additional information. Once
13 that decision is made, the amount BellSouth would charge for providing such
14 additional information obviously would depend on the expected demand for
15 the information.

16

17 Q. BEGINNING ON PAGE 9, LINE 21, MS. MONTANO MAKES A NUMBER
18 OF STATEMENTS ABOUT A MEETING BETWEEN YOU AND
19 SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION (SECCA)
20 REPRESENTATIVES. CAN YOU COMMENT ON THESE
21 STATEMENTS?

22

23 A. Yes. I indicated that Bill and Keep arrangements existed with Independent
24 Companies in certain BellSouth states, and I explained that the signaling
25 messages flow in both directions and are billed regardless of network of

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1 origination. Mr. Follensbee discusses the details of the message flow and
2 billing in his prefiled rebuttal testimony. I also agree that ALECs and other
3 carriers could implement their own CCS7 tariff arrangements and bill per-
4 message charges to carriers that use their CCS7 network in the same way that
5 BellSouth has implemented the tariff that is the subject of this proceeding.

6
7 However, I do not agree, and I certainly never meant to suggest, that this would
8 result in other carriers “simply bill[ing] BellSouth the identical invoiced
9 amounts each [carrier] is billed by BellSouth” as suggested on page 10 of Ms.
10 Montano’s testimony. For example, many carriers use BellSouth’s databases
11 (such as BellSouth’s CNAM and 800 databases) instead of either maintaining
12 their own databases or using a database maintained by a third-party provider.
13 If an ALEC uses BellSouth’s 800 database, BellSouth will charge TCAP
14 messages to that ALEC each time BellSouth’s 800 database is accessed on
15 behalf of that ALEC. BellSouth, however, is not accessing that ALEC’s 800
16 database (because the ALEC has no such database) and, therefore, BellSouth
17 would not pay that ALEC any per-message TCAP charges. Even if one were
18 to assume for the sake of argument that all other per-message signaling charges
19 between BellSouth and that ALEC “canceled out” as Ms. Montano seems to
20 suggest, that ALEC would still owe a net amount to BellSouth for TCAP
21 charges.

22

23 Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

24

25 A. Yes.