

ORIGINAL

Legal Department

E. EARL EDENFIELD JR.  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0763

May 19, 2003

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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COMMISSION  
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Re: Docket No. 030137-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Ken L. Ainsworth, Kathy K. Blake, W. Keith Milner, Ronald M. Pate, and John A. Ruscilli, which we ask that you file in the above-referenced matter.

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,

*E. Earl Edenfield, Jr.*

E. Earl Edenfield, Jr. (KA)

DN 04473-03  
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04477-03

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

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**CERTIFICATE OF SERVICE**  
**Docket No. 030137-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Hand Delivery (\*) and Electronic Mail this 19th day of May, 2003 to the following:

Patricia Christensen (\*)  
Adam Teitzman (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. 850-413-6248  
Tel. No. 850-413-6175  
[pchriste@psc.state.fl.us](mailto:pchriste@psc.state.fl.us)  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

Nanette S. Edwards, Esq.  
Regulatory Attorney  
ITC^DeltaCom  
700 Blvd. South, Suite 101  
Huntsville, AL 35802  
Tel. No. (256) 650-3957  
Fax. No. (256) 650-3852  
[NEdwards@itcdeltacom.com](mailto:NEdwards@itcdeltacom.com)

  
E. Earl Edenfield Jr. (KA)

Floyd R. Self (\*)  
Norman H. Horton, Jr. (\*)  
Messer, Caparello & Self. P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Attys. for ITC^DeltaCom  
[fself@lawfla.com](mailto:fself@lawfla.com)

David L. Adelman, Esq.  
Charles B. Jones, III, Esq.  
Sutherland, Asbill & Brennan LLP  
999 Peachtree Street, N.E.  
Atlanta, GA 30309  
Tel. No. (404) 853-8000  
Fax. No. (404) 853-8806  
Attys. for ITC^DeltaCom  
[diadelman@sablaw.com](mailto:diadelman@sablaw.com)  
[cbjones@sablaw.com](mailto:cbjones@sablaw.com)

1                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                   DIRECT TESTIMONY OF KEN L. AINSWORTH  
3                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4                   DOCKET NO. 030137-TP  
5                   May 19, 2003

6  
7 Q.   PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND  
8       YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS,  
9       INC. ("BELLSOUTH").

10  
11 A.   My name is Ken L. Ainsworth. My business address is  
12       675 West Peachtree Street, Atlanta, Georgia 30305. I am a Director  
13       for Interconnection Operations and have served in my present position  
14       since December 1997.

15  
16 Q.   PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

17  
18 A.   I have over thirty-six (36) years experience in the telecommunications  
19       industry and am currently supporting pre-ordering, ordering,  
20       maintenance and provisioning for the wholesale market.

21  
22 Q.   HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC  
23       SERVICE COMMISSION?

24  
25

1 A. Yes. I have previously testified before the Public Service  
2 Commissions in Alabama, Florida, Georgia, Kentucky, Louisiana,  
3 Mississippi, and South Carolina, the Tennessee Regulatory Authority,  
4 and the North Carolina Utilities Commission.

5

6 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

7

8 A. The purpose of this testimony is to respond to issues raised in  
9 ITC^DeltaCommunications, Inc.'s (DeltaCom's) Petition for Arbitration  
10 and to provide BellSouth's position on cooperative testing (Issue 13b),  
11 inadvertent transfer of customers (Issue 69), reimbursement of costs  
12 for trouble analysis and error resolution (Issue 70).

13

14 **Issue 13b: Testing of Unbundled Network Elements (UNEs)**

15

16 Q. CAN YOU EXPLAIN WHAT THE TERM "COOPERATIVE TESTING"  
17 MEANS?

18

19 A. Yes. Cooperative testing could also be called "joint testing". When a  
20 Competitive Local Exchange Carrier ("CLEC") desires to perform a test  
21 that requires a BellSouth technician to be physically present at the  
22 termination point of a circuit, they would request cooperative testing.  
23 The technician would then make either transmission or electrical tests  
24 with the CLEC as requested.

25

1 Q. SHOULD COOPERATIVE TESTING BE PERFORMED WITHIN TWO  
2 (2) HOURS OF A REQUEST FROM THE OTHER PARTY?

3

4 A. No. Cooperative testing can be requested by DeltaCom to be  
5 scheduled by BellSouth on a first-come, first-serve basis such that all  
6 CLECs will be treated in a non-discriminatory manner. Cooperative  
7 tests will be conducted as soon as practical upon receipt of the request  
8 from any CLEC including DeltaCom. BellSouth does not believe  
9 cooperative testing should have an interval less than the established  
10 maintenance intervals that are measured by the state Public Service  
11 Commissions, including the Florida Public Service Commission,  
12 through the approved Performance Measurements Plans.

13

14 **Issue 69: Inadvertent Transfer of Customers**

15

16 Q. SHOULD THERE BE A PROCESS TO ALLOW A CARRIER TO  
17 RETURN A CUSTOMER TO ITS' PREFERRED PROVIDER IN  
18 SITUATIONS WHERE THE CUSTOMER WAS INADVERTENTLY  
19 TRANSFERRED TO EITHER DELTACOM OR BELLSOUTH?

20

21 A. Yes. That process is in place today. BellSouth's process to return a  
22 migrated customer to BellSouth requires a service request from the  
23 customer. This process documents that a valid service request is  
24 received and properly processed to assure accurate records and  
25 inventories are established. Undocumented migration reversals would

1 cause invalid customer records, confusion, and potential customer  
2 impacts.

3

4

5 **Issue 70: Reimbursement of Costs for Trouble Analysis and Error**

6 **Resolution**

7

8 Q. SHOULD BELLSOUTH REIMBUSE DELTACOM FOR DELTACOM'S  
9 COSTS WHERE BELLSOUTH'S ERRORS REQUIRE DELTACOM  
10 TO DO TROUBLE ANALYSIS AND ERROR RESOLUTION?

11

12 A. No. BellSouth is not responsible for the internal analysis or error  
13 resolution performed by DeltaCom. CLECs are responsible for  
14 isolating trouble conditions on the BellSouth network prior to issuing a  
15 maintenance request. This trouble isolation is a part of doing business  
16 for DeltaCom or any other CLEC, just as it is for BellSouth.  
17 BellSouth's processes will resolve any BellSouth maintenance problem  
18 identified by a CLEC and have more than adequate measures in place  
19 to assure the effectiveness of these processes.

20

21 Q. DOES BELLSOUTH CHARGE DELTACOM FOR TROUBLE  
22 ANALYSIS AND ERROR RESOLUTION?

23

24 A. No. BellSouth does not charge DeltaCom, or any other CLEC, for  
25 trouble analysis and error resolution. They are only charged if the

1 trouble report results in a dispatch of a BellSouth technician and the  
2 trouble is later determined not to be a BellSouth problem.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

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