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May 26, 2004

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. 980119-TP (Supra Complaint)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony for Ronald M. Pate, 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,



James Meza III

cc: All parties of record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

DOCUMENT NUMBER-DATE

06045 MAY 26 3

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**CERTIFICATE OF SERVICE**  
**Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 26th day of May, 2004 to the following:

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James Meza III

1                                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                                   REBUTTAL TESTIMONY OF RONALD M. PATE  
3                                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4                                   DOCKET NO. 980119-TP  
5                                   MAY 26, 2004

6  
7 Q.    ARE YOU THE SAME RONALD PATE WHO FILED DIRECT TESTIMONY IN  
8        THIS PROCEEDING?

9  
10 A.    Yes.

11  
12 Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

13  
14 A.    The purpose of my testimony is to rebut issues raised by Supra  
15        Telecommunications and Information Systems, Inc.'s ("Supra's") witness, Mr.  
16        David E. Stahly, in his direct testimony in this matter. I will demonstrate the  
17        confusion and/or fallacy of Mr. Stahly's claims regarding: 1) the modification  
18        of the LENS system; 2) BellSouth's compliance with the Florida Public  
19        Service Commission's Orders ("Commission") regarding on-line edit-  
20        checking; 3) the sufficiency and appropriateness of the utilization of third party  
21        testing performed by KPMG to resolve the outstanding issues in this  
22        proceeding; and 4) other unfounded assertions by Mr. Stahly. In fact, I will  
23        show that Mr. Stahly and Supra are, at best, confused and at worst,  
24        intentionally ignoring the plain language of the applicable Commission Orders  
25        as well as the Federal Communications Commission's ("FCC's") findings In

1 re: Application of BellSouth Corporation et al for Authorization to Provide In-  
2 Region InterLATA Services in Florida and Tennessee, FCC 02-331 (Dec. 19,  
3 2002) ("Florida 271 Order") regarding the issues in this proceeding.

4  
5 I. MODIFICATION OF LENS

6  
7 Q. ARE MR. STAHLY AND SUPRA CONFUSED ABOUT WHAT THE  
8 COMMISSION'S ORDERS REQUIRED BELLSOUTH TO DO REGARDING  
9 ON-LINE EDIT-CHECKING CAPABILITY?

10  
11 A. Yes. Specifically on Pages 7, 9, 13, 16, 19 and generally throughout his  
12 entire testimony, Mr. Stahly claims that Order No. PSC-98-1001-FOF-TP  
13 ("July 1998 Order") required BellSouth to modify LENS to provide Supra with  
14 on-line edit-checking capability. In support, Mr. Stahly repeatedly cites the  
15 following excerpt from the July 1998 Order:

16  
17 "...we find that BellSouth shall be required to modify LENS to give  
18 Supra the same ordering capability that BellSouth's RN[S] system  
19 provide[s] itself in order to comply with the parity provision in the  
20 parties' agreement."

21  
22 Mr. Stahly's reliance on this passage is misplaced and does not support the  
23 position he is articulating because the Commission's reference to the  
24 modification of LENS refers only to *ordering* capability and not to *on-line edit-*  
25 *checking* capability, which is the subject of this proceeding. With regard to

1 on-line edit-checking capability, the Commission, on Page 22 of the July 1998  
2 Order, held that BellSouth was required to “provide Supra with the same  
3 interaction and on-line edit-checking capability through its interfaces that  
4 occurs when BellSouth’s retail ordering interfaces interact with BellSouth’s  
5 FUEL and SOLAR systems to check orders.” Contrary to Mr. Stahly’s  
6 testimony, nowhere in the July 1998 Order or elsewhere does the  
7 Commission require BellSouth to modify LENS to provide on-line edit-  
8 checking capability.

9  
10 Supra should be aware of this fact because the Commission previously  
11 rejected Supra’s argument on this exact issue. Indeed, on Page 6 of Order  
12 No. PSC-00-0288-PCO-TP (“February 2000 Order”) the Commission stated  
13 “Supra argues that we actually required BellSouth to modify LENS to provide  
14 on-line edit-checking capability by December 31, 1998.” The Commission  
15 then rejected this argument, stating:

16  
17 ...[N]owhere in either Order [July 1998 Order or Order  
18 No. PSC-98-1467-FOF-TP (“October 1998 Order”)] did  
19 we specifically state that the on-line edit-checking  
20 capability had to be provided specifically through the  
21 LENS interface. In each reference to this particular  
22 requirement we indicated that it must be provided  
23 generally through the ALEC ordering interfaces available  
24 to Supra. (Emphasis added)  
25 (February 2000 Order, at Page 10).

1           Why Mr. Stahly refuses to recognize the Commission's previous ruling is a  
2           mystery to BellSouth. Apparently, Mr. Stahly is either confused or misstating  
3           facts in an attempt to shore up Supra's deficient argument.

4

5   Q.    IS BELLSOUTH REQUIRED TO DEVELOP AND IMPLEMENT AN ON-LINE  
6           EDIT-CHECKING INTERFACE FOR SUPRA?

7

8   A.    No. On Page 9 of his testimony, Mr. Stahly claims that the Commission  
9           Orders in this proceeding required BellSouth to develop and implement an  
10          on-line edit-checking interface that would provide Supra with the actual ability  
11          to perform on-line edits. This is false. The Commission specifically ordered  
12          BellSouth in the October 1998 Order to provide Supra with the same ordering  
13          interaction capabilities of RNS with FUEL and SOLAR, but not the actual  
14          implementation of such a system. Thus, the Commission never required  
15          BellSouth to provide Supra with on-line edits implemented up front in an  
16          interface, which would have required BellSouth to replicate its retail systems  
17          and install hardware at Supra's premises. Rather, BellSouth was required to  
18          provide Supra with the capability to implement on-line edits.

19

20          Further supporting this conclusion is that the Commission, in the October  
21          1998 Order, stated that "in view of BellSouth's assertions that it would be  
22          necessary to place equipment at Supra's premises, we shall, however, clarify  
23          that BellSouth does not need to provide the exact same interfaces that it  
24          uses." (October 1998 Order, Page 15.) Additionally, the Order went on to  
25          state "we shall not require BellSouth to duplicate its RNS and DOE interfaces

1 at Supra's premises." (October 1998 Order, Page 21.) Thus, the  
2 Commission expressly rejected the obligations that Mr. Stahly now claims the  
3 Commission ordered. In fact, to do what Mr. Stahly now claims BellSouth  
4 was ordered to do, would directly conflict with the Commission's October  
5 1998 Order.

6  
7 Therefore, contrary to Mr. Stahly's testimony, BellSouth is not in violation of  
8 the Commission's Orders because the Commission never ordered what Mr.  
9 Stahly describes in its testimony. Simply put, BellSouth cannot be in violation  
10 of a requirement that does not exist. Nevertheless, as set forth in my direct  
11 testimony and as further described below, BellSouth has timely complied with  
12 the Commission's Orders requiring BellSouth to provide Supra with on-line  
13 edit-checking capabilities.

14  
15 II BELLSOUTH'S COMPLIANCE WITH THE COMMISSION'S ORDERS

16  
17 Q. DID BELLSOUTH TIMELY COMPLY WITH THE COMMISSION'S ORDERS  
18 TO PROVIDE SUPRA WITH THE SAME INTERACTION AND ON-LINE  
19 EDIT-CHECKING **CAPABILITY** THAT OCCURS BETWEEN BELLSOUTH'S  
20 RNS SYSTEM AND THE FUEL AND SOLAR SYSTEMS?

21  
22 A. Yes, unequivocally. Please see my Direct Testimony filed in this proceeding  
23 on April 21, 2004, Pages 4-7 for the history and resolution of this matter. For  
24 ease of reference, I will restate some of that testimony here. In the July 1998  
25 Order, the Commission ordered BellSouth to "provide the same on-line edit-

1 checking capability to Supra that BellSouth's retail ordering systems provide."  
2 See July 1998 Order, at Page 47. In its October 1998 Order, at Pages 15  
3 and 21, the Commission stated that it was not requiring BellSouth to duplicate  
4 its RNS and DOE interfaces at Supra's premises for on-line edit-checking  
5 capability or to place equipment or hardware at Supra's premises. Rather,  
6 the Commission clarified that BellSouth was to provide Supra with the on-line  
7 edit-checking ***capability*** that occurred when BellSouth's retail ordering  
8 interfaces interacted with BellSouth's FUEL and SOLAR systems to check  
9 orders.<sup>1</sup>

10  
11 BellSouth complied with this requirement by providing CLECs with the  
12 BellSouth business rules, which are found in the Local Ordering Handbook,  
13 and in July 1998 with the Service Order Edit Routine ("SOER") that BellSouth  
14 uses to process its retail orders.<sup>2</sup>

15  
16 A CLEC can use the BellSouth business rules and SOER edits to create and  
17 customize its machine-to-machine interfaces to meet its business needs,  
18 including specific on-line edit-checking capability. Simply stated, BellSouth's  
19 business rules say "this is how to input an order correctly," and the SOER  
20 edits check to see if it was inputted correctly. These are the same tools that  
21 BellSouth has utilized to program its RNS system to provide it with the  
22 capability to interact with its FUEL and SOLAR systems to check orders.

---

<sup>1</sup> October 1998 Order, at Pages 18 and 24. FUEL stands for Field Identifier (FID)/Universal Service Order Code (USOC) Editing Library. SOLAR stands for Service Order Language Analysis Routines.

<sup>2</sup> The SOER edits were provided to CLECs in July 1998 via [http://search.interconnection.bellsouth.com/icportal/highlight\\_html.jsp?url=http%3A%2F%2Finterconnection.bellsouth.com%2Fcarrier%2Fec%2Fhtml%2Foss\\_info.html&sentencelid=7008243](http://search.interconnection.bellsouth.com/icportal/highlight_html.jsp?url=http%3A%2F%2Finterconnection.bellsouth.com%2Fcarrier%2Fec%2Fhtml%2Foss_info.html&sentencelid=7008243). This site points to the security page, where a CLEC would enter its user name and password.



1           Accordingly, Supra could have and should have used these tools that have  
2           been available through the business rules and since July 1998 through the  
3           SOER edits to program its ordering system to achieve the same interaction  
4           capabilities that are provided through BellSouth's FUEL and SOLAR systems  
5           to check orders.

6

7   Q.    CAN YOU DESCRIBE IN DETAIL HOW BELLSOUTH COMPLIED WITH  
8           THE COMMISSION'S PREVIOUS ORDERS IN THIS PROCEEDING?

9

10  A.    Yes. To provide such an explanation, I will describe the interaction of RNS  
11           with FUEL and SOLAR. A diagram of the order flow is attached as Exhibit  
12           RMP-1 entitled "Process Flow for Ordering." This Exhibit also depicts the flow  
13           of wholesale orders. The Process Flow for Ordering diagram shows how  
14           service orders flow as they are inputted and transmitted through the retail  
15           service order negotiation system to the Service Order Communications  
16           System ("SOCS"). Note that FUEL and SOLAR are indicated to reside in the  
17           RNS "box" on the diagram. That is because FUEL and SOLAR are integrated  
18           into the RNS application, and they function as one executable. FUEL  
19           contains Field Identifiers ("FIDs") and Universal Service Order Codes  
20           ("USOCs") definitions and attribute data that is used by SOLAR to validate the  
21           data entries inputted into RNS. The definitions and attributes in FUEL and  
22           SOLAR are based on the requirements found in the business rules and  
23           SOER edits.

24

1           When the order leaves RNS, it is sent to the Store Forward Message  
2           Infrastructure ("SFMI"). SFMI provides a means of transporting the  
3           transaction data between the front-end RNS application and the back-end  
4           mainframes applications such as SOCS. SMFI provides assured delivery,  
5           auditing logging, alarming, and automated failover.

6  
7           BellSouth provided Supra in 1998 with the tools (the business rules and the  
8           SOER edits) to replicate this process in its interfaces to meet its business  
9           needs. CLECs, using the machine-to-machine<sup>3</sup> Electronic Data Interchange  
10          ("EDI") interface or TAG interface, have the capability to create, customize  
11          and tailor any on-line editing capabilities they desire using the business rules  
12          and the SOER edits that BellSouth has provided.

13  
14          Indeed, acting as a pseudo CLEC as part of the Third Party Test, KPMG  
15          tested the CLECs' ability to develop and implement a machine-to-machine  
16          interface using BellSouth's business rules, thus proving that BellSouth  
17          provides non-discriminatory access to its OSS. Implicit with a machine-to-  
18          machine interface is the capability to program up front on-line edits tailored to  
19          meet a CLEC's unique needs. Therefore, the Third Party Test further  
20          supports a finding that BellSouth complied with the Commission's Orders in  
21          this docket because KPMG did what Supra could have done using the  
22          information provided by BellSouth.

23

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<sup>3</sup> In simple terms, a machine-to-machine interface (sometimes called "application-to-application interfaces") permits transmittal and receipt of data electronically so that the data will automatically populate computer systems and databases without human intervention.

1 Q. DOES BELLSOUTH ALSO PROVIDE NON-DISCRIMINATORY ACCESS TO  
2 PRE-ORDERING AND ORDERING COMPONENTS OF ITS OSS?

3

4 A. Yes. Under the standard set forth by the FCC regarding non-discriminatory  
5 access and as found by the FCC and by this Commission, BellSouth provides  
6 non-discriminatory access to its OSS. It would be inherently inconsistent to  
7 find that BellSouth has violated the Commission's orders regarding on-line  
8 edit capability in this proceeding when both this Commission and the FCC  
9 have found that BellSouth provides non-discriminatory access to its ordering  
10 and pre-ordering systems.

11

12 III. THE THIRD PARTY TEST WAS THE PROPER INSTRUMENT FOR  
13 RESOLUTION OF ISSUES IN THIS DOCKET

14

15 Q. DID THE COMMISSION PROPERLY RELY ON THE THIRD PARTY TEST  
16 TO RESOLVE THIS ISSUE?

17

18 A. Absolutely. The Commission could not have relied on a more appropriate  
19 tool. As discussed in detail above, non-discriminatory access was the  
20 standard by which BellSouth's OSS was to be measured, and the *very*  
21 *purpose* of the Third Party Test was to prove non-discriminatory access to  
22 BellSouth's OSS. KPMG tested BellSouth's CLEC interfaces to determine if  
23 BellSouth was providing non-discriminatory access to its OSS. This was  
24 accomplished by KPMG acting as a pseudo CLEC. As a pseudo CLEC,  
25 KPMG built the machine-to-machine interfaces per the BellSouth business

1 rules and specifications, and proved that the interfaces worked as planned.  
2 The system properly checked for errors in submitted orders and accepted  
3 them if they were accurate and complete. If they were not accurate and  
4 complete, the system clarified or rejected the order as appropriate. Further,  
5 the Third Party Test demonstrated that access to the wholesale ordering  
6 process was provided in substantially the same time and manner as  
7 BellSouth provided this process for itself. Both wholesale and retail orders  
8 ultimately are submitted to SOCS, where the handling of both types of orders  
9 is identical. (See Exhibit RMP-1) Accordingly, KPMG found BellSouth to be in  
10 compliance with its non-discriminatory access requirements, as prescribed by  
11 the FCC.

12  
13 Q. WHAT DID KPMG'S END-TO-END TESTING OF BELLSOUTH'S PRE-  
14 ORDER, ORDER AND PROVISIONING FUNCTIONS ENTAIL, AND WHAT  
15 WERE THE RESULTS OF THE THIRD PARTY TESTING PERFORMED BY  
16 KPMG WITH REGARD TO BELLSOUTH'S CLEC OPERATIONS SUPPORT  
17 SYSTEMS?

18  
19 A. Local Service Request ("LSR") orders were submitted, including both erred  
20 and error free transactions. The tests were designed such that LSR orders  
21 were submitted with errors to determine if the output would correctly result in  
22 a clarification and flow the order back to the CLEC for correction.  
23 Additionally, error-free transactions were submitted to ensure that the orders  
24 would be processed correctly. The Third Party Test proved, unequivocally,  
25 that BellSouth's interfaces provide non-discriminatory access to BellSouth's

1 OSS. Indeed, KPMG found in TVV1-1-2 that "BellSouth TAG interface  
2 provides expected order functionality." In TVV1-1-3, KPMG found that  
3 "BellSouth LENS interface provides expected order functionality."  
4 Accordingly, both LENS and TAG were found to be non-discriminatory  
5 interfaces per the criteria used in the Third Party Test in Florida, which  
6 included testing of transactions that contained errors.<sup>4</sup>

7  
8 In its September 28, 2000 Order (Order No. PSC-00-1777-PCO-TP), at Page  
9 9, the Commission ruled that it should rely on the Third Party Test in order to  
10 avoid duplicative proceedings to determine whether BellSouth has complied  
11 with the Commission's Orders regarding on-line edit-checking capability. The  
12 Commission held that "the information and determinations made in that [Third  
13 Party Test] proceeding will be employed in this Docket to the fullest extent  
14 possible."

15  
16 After the conclusion of the Third Party Test and a complete review by the  
17 FCC of BellSouth's OSS for 271 compliance, the Commission determined in  
18 the October 2003 Order (Order No. PSC-03-1178-FAA-TP) that BellSouth  
19 had met its burden in this matter. Specifically, on Pages 8-9 of the October  
20 2003 Order, the Commission found that, "[t]he [Third Party Test]  
21 demonstrates that BellSouth has made available the on-line edit-checking  
22 capability," and has "complied in a timely manner with the requirements of the  
23 post-hearing Final Order in this Docket. . . ." Thus, it is clear that the  
24 Commission has considered this matter carefully and thoroughly.

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<sup>4</sup> KPMG Final Report at 182, 185, Version 2.0 (July 30, 2002) (App. C – FL, Tab 57).

1 Q. MR. STAHLY DISREGARDS THE PARTICIPATION OF THE COMMISSION  
2 AND OTHER CLECS IN THE THIRD PARTY TEST, AND CLAIMS THAT  
3 THE FCC IMPROPERLY RELIED ON KPMG'S THIRD PARTY TEST IN THE  
4 271 PROCEEDING. PLEASE DISCUSS.

5  
6 A. On Pages 14-18, Mr. Stahly dismisses the findings of this Commission,  
7 KPMG, and the FCC by claiming that the Commission apparently cannot rely  
8 on any source, other than Supra's opinion, in its decision making process.  
9 Supra's claim overlooks the facts in this case. The FCC relied on the KPMG  
10 Third Party Test because it was a thorough examination of BellSouth's OSS  
11 and was performed under the close scrutiny of this Commission as well as the  
12 CLECs. I fully described the participation in the Third Party Test by the  
13 CLECs in my Direct Testimony filed on April 21, 2004, Pages 9-11. I  
14 explained that the Third Party Test performed by KPMG was open to the  
15 scrutiny of CLECs, and that CLECs were extensively involved in every aspect  
16 of the test, including attendance at the calls and meetings as described in the  
17 Master Test Plan. The FCC confirmed these facts in the Florida 271 Order as  
18 it held that "KPMG also sought input from both the Florida Commission and  
19 competitive LECs to understand the types of activities that had previously  
20 presented problems or otherwise were of concern." See Florida 271 Order, at  
21 ¶ 72 (emphasis added). The FCC further stated that "[w]e note that the  
22 Florida KPMG test was actively monitored by other state commissions in  
23 BellSouth's territory and that it has been widely recognized for its  
24 independence, openness to competitive LEC participation, breadth of  
25 coverage, and level of detail." Id. at ¶ 75 (emphasis added).

1           Supra could have availed itself of the opportunity to participate in the Third  
2           Party Test but chose to remain silent, notwithstanding the Commission's  
3           previous decisions in this docket. BellSouth cannot be held accountable for  
4           Supra's negligence and failure to act.

5  
6           Simply put, CLECs participated in the Third Party Test, CLECs raised issues  
7           and concerns regarding the Third Party Test, the Commission addressed  
8           each CLEC issue and concern, the FCC confirmed that CLECs had input in  
9           the Third Party Test and that the Commission addressed these concerns.  
10          This is a non-issue and does not deserve further consideration.

11  
12          Next, unbelievably, on Page 18 of his testimony, Mr. Stahly boldly states that  
13          the "FCC took no evidence from CLECs." This statement is false, and it is  
14          odd that Supra would make such a claim, as Supra filed testimony and raised  
15          almost identical criticisms regarding the Third Party Test with the FCC in  
16          BellSouth's 271 case. The FCC rejected all of these arguments. Once  
17          again, Mr. Stahly's testimony is flatly contradicted by information and findings  
18          that both he and Supra should have been aware of prior to filing his  
19          testimony.

20

1 IV. MISCELLANEOUS MATTERS

2  
3 A. BellSouth's Timely Provision of Rejects and Clarifications

4  
5 Q. MR. STAHLY IMPLIES ON PAGE 4, LINES 10 – 12, OF HIS DIRECT  
6 TESTIMONY THAT SUPRA EXPERIENCES REJECT NOTIFICATION  
7 DELAYS THAT PREVENT ITS CUSTOMERS' NEW SERVICE FROM BEING  
8 INSTALLED ON A TIMELY BASIS. PLEASE COMMENT.

9  
10 A. Although Mr. Stahly claims that Supra has experienced notification delays of  
11 anywhere from "a couple of hours to a couple of days," the results of the  
12 metric for reject and clarification intervals demonstrate that BellSouth is  
13 meeting its timeliness obligations.

14  
15 **For background purposes,** the Commission adopted a broad range of  
16 **performance measures and** standards designed to create incentives for  
17 **BellSouth's post-entry compliance** with its section 271 non-discriminatory  
18 **access obligations. One such** measure is reject timeliness. With respect to  
19 **orders submitted electronically,** a benchmark was established for mechanized  
20 **and partially mechanized orders.** For mechanized orders the benchmark is  
21 97% of rejects returned within one hour. For partially mechanized orders the  
22 benchmark is 95% returned within 10 hours. These benchmarks were  
23 established as a point of measure to ensure rejects are returned in  
24 substantially the same time and manner to CLECs as BellSouth does for  
25 itself. Meeting this reject timeliness enables an efficient CLEC to adequately



1 serve its end-user customers and thus have a meaningful opportunity to  
2 compete in the market place.

3  
4 Attached as proprietary Exhibit RMP-2 are the reject timeliness results for the  
5 first quarter of 2004 for the state of Florida as well as for Supra. This exhibit  
6 contains proprietary information and will be provided pursuant to the  
7 appropriate Protective Agreement and under a Notice of Intent filed with the  
8 Commission. These results were summarized from the data provided on  
9 BellSouth's Performance Measurement Analysis Platform (PMAP) using  
10 Florida's Single Reporting Structure ("SRS") data and Supra's individual  
11 performance data. Florida results are provided for those products where  
12 Supra also had performance data.

13  
14 A review of these results clearly demonstrates that BellSouth is meeting its  
15 obligations for the timely return of rejections of orders that are solely due to  
16 Supra's input errors or inability to follow the established business rules.  
17 Supra results generally meet or exceed the applicable benchmarks.

18  
19 **B. Accuracy of Orders**

20  
21 Q. ON PAGES 4 AND 12 OF HIS TESTIMONY, MR. STAHLY CLAIMS THAT  
22 BELL SOUTH'S RNS GUARANTEES THAT BELL SOUTH SUBMITS  
23 SERVICE ORDERS THAT ARE ALWAYS 100% ACCURATE. IS THAT  
24 CORRECT?

1 A. No, it is not. Mr. Stahly is incorrect when he states that, "RNS ensures that  
2 BellSouth representatives will only submit orders that are 100% accurate and  
3 will not be rejected by BellSouth's Service Order Communications System  
4 ("SOCS")," (Page 4) and that, "BellSouth's RNS system . . . does not allow its  
5 sales representatives to submit orders with errors; thus, none of BellSouth's  
6 orders are rejected due to errors on the order entry form" (Page 12). Mr.  
7 Stahly has no basis in fact for either statement.

8

9 Q. DOES SOCS REJECT ORDERS THAT BELLSOUTH SUBMITS VIA RNS?

10

11 A. Yes. Although BellSouth certainly would like 100% of its orders to be  
12 accepted by SOCS, approximately 10-15% of BellSouth's RNS orders are  
13 rejected monthly due to errors. These errors occur despite the fact that the  
14 orders are checked through the interaction of FUEL and SOLAR, which I  
15 discussed earlier.

16

17 Q. HOW DOES BELLSOUTH HANDLE ORDERS FROM RNS THAT HAVE  
18 BEEN REJECTED?

19

20 A. After receiving reject information, BellSouth must correct these orders by  
21 manually reviewing and fixing the errors. BellSouth then resends these  
22 orders to SOCS, where they are checked for errors again and sent  
23 downstream for provisioning, if they pass the SOER edits in SOCS.

24

1 Thus, contrary to Mr. Stahly's statements on Pages 4 and 12 of his testimony,  
2 and regardless of the edit-checking capabilities of RNS, BellSouth's RNS  
3 does allow residential sale representatives to submit orders with errors and  
4 those incorrect orders are rejected by SOCS.

5  
6 Q. SHOULD AN EFFICIENT COMPETITOR HANDLE ITS ERRORS IN A  
7 SIMILAR MANNER?

8  
9 A. Yes. After receiving a reject notice from BellSouth, a CLEC should review  
10 and fix its rejected request. The CLEC should resend the LSR via its chosen  
11 electronic ordering interface. The LSR would be checked by BellSouth's  
12 OSS, and, if free of errors, converted to a service order. Then the CLEC's  
13 service order would be sent to SOCS, where the order would be checked for  
14 errors again and sent downstream for provisioning, if it passed the SOER  
15 edits in SOCS.

16  
17 Q. ON PAGE 12 OF HIS TESTIMONY, MR. STAHLY CLAIMS THAT HIS  
18 EVIDENCE THAT BELLSOUTH HAS NOT PROVIDED SUPRA WITH THE  
19 SAME EDIT-CHECKING IS BASED ON HIS BELIEF THAT NONE OF  
20 BELLSOUTH'S RNS ORDERS ARE REJECTED. PLEASE COMMENT.

21  
22 A. As I have just discussed, orders sent via RNS are rejected by SOCS due to  
23 errors. Consequently, Mr. Stahly's misbelief cannot be used as evidence  
24 against BellSouth. As stated elsewhere in this testimony, the Florida

1 Commission only required BellSouth to provide CLECs with the same on-line  
2 edit-checking *capability*, and BellSouth has done that.

3  
4 **C. TAG - CLEC Ordering Interface**

5  
6 Q. IS TAG A CLEC ORDERING INTERFACE?

7  
8 A. Yes. Contrary to Mr. Stahly's declaration on Page 13 of his testimony that,  
9 "TAG is not a CLEC ordering interface[.]" TAG is a CLEC ordering interface,  
10 as the Commission is well aware, as a result of the extensive 271  
11 proceedings. I will reiterate here for convenience. TAG uses the industry  
12 standard protocol (CORBA) for pre-ordering. In September 1997, when the  
13 industry voted to approve two standard protocols for pre-ordering interfaces,  
14 CORBA and EDI TCP/IP/SSL3,<sup>5</sup> the industry anticipated that CORBA would  
15 become the preferred long-term solution. BellSouth, therefore, built its  
16 machine-to-machine pre-ordering interface to the CORBA standard, rather  
17 than the EDI standard. BellSouth named its CORBA-based interface the  
18 Telecommunications Access Gateway, or TAG. Similarly, Verizon calls its  
19 CORBA-based pre-ordering interface the "CORBA Gateway."<sup>6</sup> SBC calls its  
20 interface the "CORBA interface."<sup>7</sup> In addition to providing a TAG pre-ordering  
21 interface, BellSouth also decided to build a TAG ordering interface based on  
22 the same protocol. The TAG ordering interface was provided in November  
23 1998.

24  

---

<sup>5</sup>TCP/IP/SSL3 stands for Transmission Control Protocol/Internet Protocol over Secure Sockets Layer 3.

<sup>6</sup><http://www22.verizon.com/wholesale/lsp/connguide/1,4-East-PreOrder-corba,00.html>

<sup>7</sup><https://clec.sbc.com/clec/hb/>

1 Q. IN SUMMARY, DID BELLSOUTH COMPLY IN A TIMELY MANNER WITH  
2 THE FLORIDA PUBLIC SERVICE COMMISSION'S PREVIOUS ORDERS  
3 CONCERNING ON-LINE EDIT-CHECKING CAPABILITY?

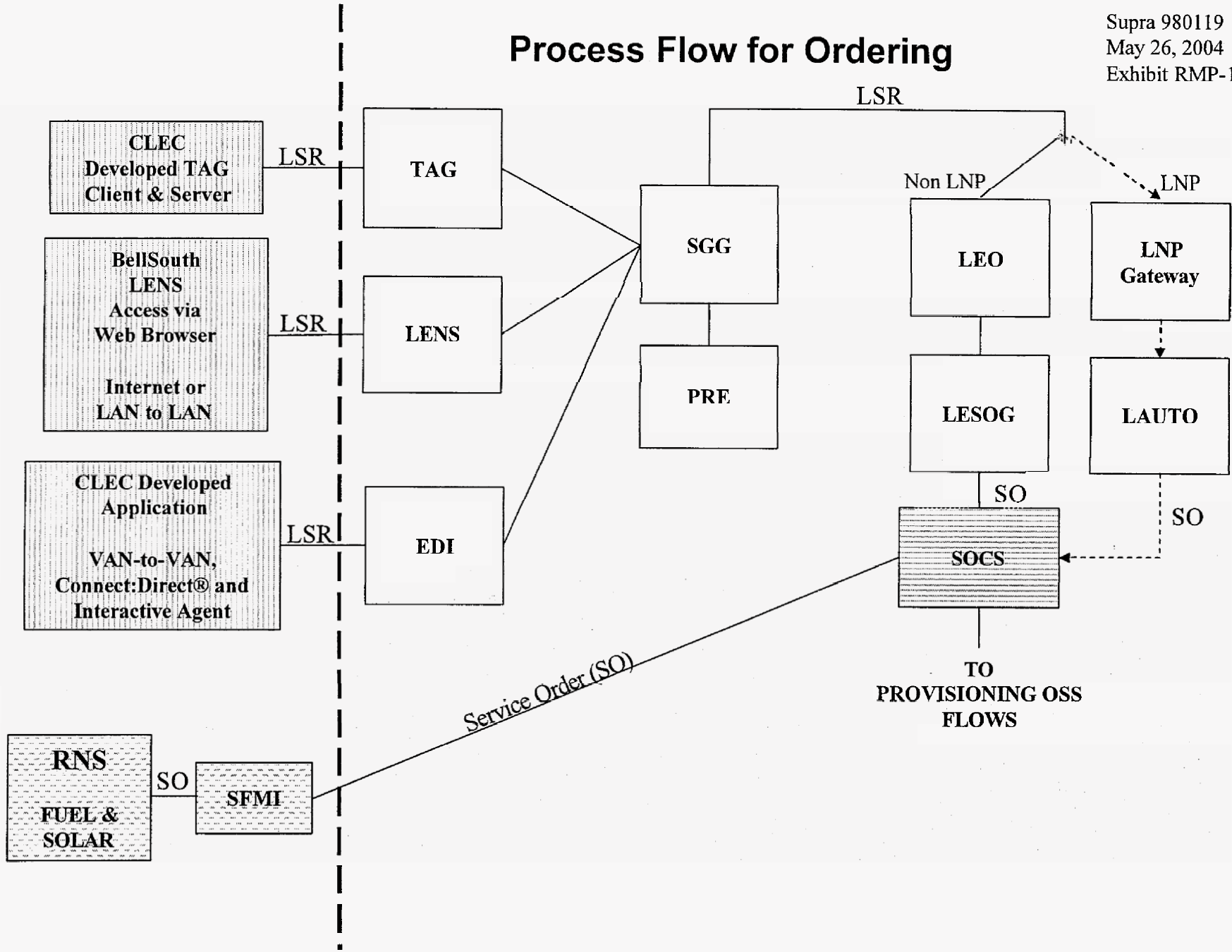
4  
5 A. Yes. BellSouth has fully complied as required in Order No. PSC-98-1001-  
6 FOF-TP, as amended. As correctly found by the Commission, BellSouth  
7 provided on-line edit-checking capabilities through EDI as of July 1998,  
8 through TAG as of November 1998, and through LENS as of January 2000.

9  
10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

11  
12 A. Yes.

13

# Process Flow for Ordering



A	B	C	D	E	F	G	H	I
1	Florida, January 2004 - March 2004							
2	Ordering							
3	Reject Interval - Mechanized							
4	(% of CLEC Reject Notification within Intervals)							
5	Numerator indicates total number of CLEC reject notification within interval hours for this disaggregation in the reporting period							
6	Volume indicates total number of service requests for this disaggregation rejected in the reporting period							
7	Benchmark 97% <=1 Hour							
8	State of Florida - ALL CLECs				Supra Total			
9	Month	Product Group Description	Numerator	Volume	Metric	CLEC Numerator	CLEC Volume	CLEC Metric
10	Jan-04	Resale Business	197	199	98.99 %			
11	Feb-04	Resale Business	147	148	99.32 %			
12	Mar-04	Resale Business	175	176	99.43 %			
13								
14	Jan-04	Resale Residence	1432	1476	97.02 %			
15	Feb-04	Resale Residence	1140	1144	99.65 %			
16	Mar-04	Resale Residence	1211	1215	99.67 %			
17								
18	Jan-04	2W Analog Loop w/LNP - Design	3	3	100.00 %			
19	Feb-04	2W Analog Loop w/LNP - Design	3	3	100.00 %			
20	Mar-04	2W Analog Loop w/LNP - Design	1	1	100.00 %			
21								
22	Jan-04	2W Analog Loop w/LNP - Non-Design	408	408	100.00 %			
23	Feb-04	2W Analog Loop w/LNP - Non-Design	226	227	99.56 %			
24	Mar-04	2W Analog Loop w/LNP - Non-Design	185	190	97.37 %			
25								
26	Jan-04	UNE Loop + Port Combinations	15566	16047	97.00 %			
27	Feb-04	UNE Loop + Port Combinations	14089	14278	98.68 %			
28	Mar-04	UNE Loop + Port Combinations	19669	20188	97.43 %			
29								
30	Jan-04	UNE Other Non-Design	1571	1614	97.34 %			
31	Feb-04	UNE Other Non-Design	1965	1971	99.70 %			
32	Mar-04	UNE Other Non-Design	1857	2022	91.84 %			
33								
34	Jan-04	EELs	16	16	100.00 %			
35	Feb-04	EELs	10	11	90.91 %			
36	Mar-04	EELs	29	29	100.00 %			
37								

	A	B	C	D	E	F	G	H	I
1	Florida, January 2004 - March 2004								
2	Ordering								
3	Reject Interval - Partial Mechanized								
4	(% of CLEC Reject Notification within Intervals)								
5	Numerator indicates total number of CLEC reject notification within interval hours for this disaggregation in the reporting period								
6	Volume indicates total number of service requests for this disaggregation rejected in the reporting period								
7	Benchmark 95% <= 10 Hours								
8				State of Florida - ALL CLECs			Supra Total		
9	Month	Product Group Description	Numerator	Volume	Metric		CLEC Numerator	CLEC Volume	CLEC Metric
10	Jan-04	Resale Business	257	272	94.49 %				
11	Feb-04	Resale Business	287	296	96.96 %				
12	Mar-04	Resale Business	269	274	98.18 %				
13									
14	Jan-04	Resale Residence	887	939	94.46 %				
15	Feb-04	Resale Residence	712	761	93.56 %				
16	Mar-04	Resale Residence	700	769	91.03 %				
17									
18	Jan-04	2W Analog Loop Non-Design	126	147	85.71 %				
19	Feb-04	2W Analog Loop Non-Design	133	164	81.10 %				
20	Mar-04	2W Analog Loop Non-Design	104	125	83.20 %				
21									
22	Jan-04	2W Analog Loop w/LNP - Non-Design	533	614	86.81 %				
23	Feb-04	2W Analog Loop w/LNP - Non-Design	485	648	74.85 %				
24	Mar-04	2W Analog Loop w/LNP - Non-Design	243	265	91.70 %				
25									
26	Jan-04	UNE Loop + Port Combinations	11902	12270	97.00 %				
27	Feb-04	UNE Loop + Port Combinations	11089	11477	96.62 %				
28	Mar-04	UNE Loop + Port Combinations	11370	11886	95.66 %				
29									
30	Jan-04	UNE Other Non-Design	496	506	98.02 %				
31	Feb-04	UNE Other Non-Design	520	529	98.30 %				
32	Mar-04	UNE Other Non-Design	492	497	98.99 %				
33									
34	Jan-04	EELs	8	8	100.00 %				
35	Feb-04	EELs	11	12	91.67 %				
36	Mar-04	EELs	12	12	100.00 %				
37									