

JAMES MEZA III
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August 12, 2004

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COMMISSION
CLERK

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

**Re: 031125-TP: Complaint of IDS Telecom LLC against BellSouth
Telecommunications, Inc., for over billing and discontinuance of
service, and petition for emergency order restoring service**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Rodger D. Edmonds, Gregory R. Follensbee, David F. Melton, Jr., and Carlos Morillo, 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
James Meza III
RH

Edmonds - 08800-04
Follensbee - 08801-04
Melton - 08804-04
Morillo - 08808-04

CMP
COM 3+org
CTR _____ Enclosures
ECR _____
GCL 1 cc: All Parties of Record
Marshall M. Criser III
OPC _____ R. Douglas Lackey
MMS _____ Nancy B. White
RCA 1
SCR _____
SEC 1
OTH _____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08800 AUG 12 3

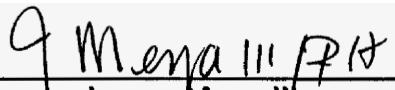
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 031125-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 12th day of August, 2004 to the following:

Patty Christensen
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
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Represents IDS


James Meza III

1 Bellsouth Telecommunications, Inc.
2 Rebuttal Testimony of Rodger D. Edmonds.
3 Before the Florida Public Service Commission
4 Docket No. 031125-TP
5 August 12, 2004
6

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

10
11 **A.** My name is Rodger D. Edmonds. I am employed by BellSouth as Customer Service
12 Manager for Interconnection Billing & Collections. My business address is One Chase
13 Corporate Center, Birmingham, Alabama, 35244.
14

15 **Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND**
16 **EXPERIENCE.**

17
18 **A.** I began employment with South Central Bell as a Directory Clerk in Birmingham,
19 Alabama in 1977. I worked as a processing clerk in Corporate Communications and as a
20 service representative in the Residence Consumer organization before working in
21 Interconnection. In 1994, I began working as a service representative in BellSouth's
22 Interconnection Carrier Services ("ICS") billing group. Since then, I have worked as a
23 manager in the capacity of Supervisor-Billing and Staff Manager-UNE Product
24 Development. Currently, I am a Customer Service Manager for the ICS Billing &
25 Collections group.

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

2

3 A. The purpose of my testimony is to rebut the Direct Testimony of Elizabeth Fefer of IDS
4 regarding conversations we had relating to BellSouth's termination of IDS's access to
5 LENS for the nonpayment of undisputed amounts in December 2003.

6

7 **Q. IN HER TESTIMONY ON PAGE 7, LINES 8-16, MS.FEFER CLAIMS THAT, IN**
8 **CONVERSATIONS WITH YOU REGARDING BELLSOUTH'S REASONS FOR**
9 **DISCONNECTING IDS'S LENS ACCESS, YOU TOLD HER THAT THE PAST**
10 **DUE AMOUNT WAS FOR THE PAST DUE Q ACCOUNT. IS THIS AN**
11 **ACCURATE STATEMENT?**

12

13 A. No. Regarding the termination of IDS' access to LENS, Ms. Fefer contacted me on
14 December 19, 2003. In this conversation, I informed her that, even after taking into
15 account IDS' recent payments for its UNE bills as well as its disputes, IDS still owed
16 BellSouth \$611,627.42 in undisputed, past due resale billings, which must be paid to
17 restore access to LENS. In response, Ms. Fefer said that this unpaid balance was for the
18 Past Due Q Account. I was not familiar with this dispute at the time of our conversation
19 because IDS had not submitted a BAR Form asserting this specific dispute. I advised
20 Ms. Fefer that I would get back to her after I talked to another BellSouth employee
21 familiar with the issue, Maxine Alagar. I subsequently spoke with Ms. Alagar who
22 advised that the Past Due Q Account issue had been discussed numerous times with IDS
23 and she confirmed that IDS must pay the \$611,627.42 in undisputed, resale billings
24 before LENS could be restored. I relayed this information back to Ms. Fefer. Contrary

1 to her testimony, I never advised her that the \$611,627.42 represented amounts unpaid in
2 the Past Due Account.

3
4 In any event, it should be noted that the Past Due Q Account is Account No. 205Q974557
5 and that, in BellSouth's December 3, 2003 treatment letter, which is attached as Exhibit
6 KKB-1 to Ms. Blake's direct testimony, this Account had an unpaid balance of
7 \$578,506.04. Thus, even without taking into account the Past Due Q Account, IDS still
8 owed BellSouth approximately \$33,000 in past due, undisputed resale billings.

9
10 **Q. MS. FEFER CLAIMS THAT AN E-MAIL EXCHANGE BETWEEN YOU AND**
11 **SHE CLEARLY SUPPORTS HER ALLEGATIONS THAT BELLSOUTH'S**
12 **DEMAND FOR PAST DUE AMOUNTS WERE SOLELY BASED ON AMOUNTS**
13 **OWING UNDER THE SPECIAL Q ACCOUNT. DO YOU BELIEVE THIS TO**
14 **BE THE CASE?**

15
16 **A.** No. As clearly demonstrated in the e-mail produced in Ms. Fefer's Exhibit EF-4, I never
17 advised Ms. Fefer that the past due amount of \$611,627.42 was attributable to the Past
18 Due Q Account. Instead, I advised her that "[n]otices were sent that have expired. IDS
19 has not paid the undisputed portion of the bill. Lens will be restored when we receive the
20 full amount of the undisputed charges, \$611,627.42." Further, consistent with my
21 testimony above, I deny Ms. Fefer's characterization of our conversation in her e-mail to
22 me, which is also attached in Exhibit EF-4.

23
24 **Q. MS. FEFER CLAIMS THAT AFTER IDS FILED THIS COMPLAINT WITH**
25 **THE FLORIDA PUBLIC SERVICE COMMISSION BELLSOUTH CONCEDED**

1 **THAT LENS ACCESS HAD BEEN TERMINATED DUE TO NON-PAYMENT**
2 **OF THE SPECIAL Q ACCOUNT. IS THIS AN ACCURATE STATEMENT?**

3
4 A. No. On the 19th of December, I spoke with Ms. Fefer and Angel Leiro, who were both
5 very adamant that the past due amount was solely related to the Past Due Q Account. I
6 never agreed with their statements.

7
8 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

9
10 A. Yes.