

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REVISED DIRECT TESTIMONY

OF

JERRY WATTS

On Behalf of

ITC^DeltaCom Communications, Inc.

DOCKET NO. 041269-TP

**GENERIC PROCEEDING TO EXAMINE ISSUES RELATED TO BELLSOUTH'S
OBLIGATION TO PROVIDE UNBUNDLED NETWORK ELEMENTS**

October 3, 2005

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1 **Q: PLEASE STATE YOUR NAME POSITION AND BUSINESS ADDRESS.**

2 A: My name is Jerry Watts, I am Vice President of Government and Industry Affairs
3 for ITC^DeltaCom, Communications, Inc. d/b/a ITC^DeltaCom ("DeltaCom"). My
4 business address is 7037 Old Madison Pike Huntsville, Alabama, 35806.

5

6 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS**
7 **EXPERIENCE.**

8 A: I am a graduate of Auburn University with a B.S. in Accounting. I have over thirty
9 years experience in the telecommunications industry including positions with
10 Southern Bell, South Central Bell, BellSouth, AT&T, and ITC^DeltaCom. Most of
11 my career has been in the area of Government Affairs with responsibility for both
12 regulatory and legislative matters at the state and federal level.

13

14 I have served as an officer or board member for several industry associations
15 including the Alabama Mississippi Telephone Association, The Georgia
16 Telephone Association, The Alabama Inter-Exchange Carriers Association, The
17 Southeastern Competitive Carriers Association and The Georgia Center for
18 Advanced Telecommunications Technology. I currently serve as President of
19 The Competitive Carriers of the South, ("CompSouth"), a non-profit association of
20 competitive telecommunications companies operating in the Southeast. I also
21 serve as a board member of CompTel/ALTS. CompTel/ALTS is the leading
22 industry association representing 350 competitive facilities-based
23 telecommunications service providers, emerging VoIP providers, integrated

1 communications companies, and their supplier partners. CompTel/ALTS
2 members are building and deploying packet and IP-based networks to provide
3 competitive voice, data and video services in the U.S. and around the world. The
4 association, based in Washington, D.C., includes companies of all sizes and
5 profiles, from the largest next-generation network operators to small,
6 entrepreneurial companies. I have previously presented testimony in Georgia.
7

8 **Q: WHAT ARE YOUR RESPONSIBILITIES AT ITC^DELTACOM?**

9 A: I am responsible for ITC^DeltaCom's relationship with state and federal
10 government entities including state public utility commissions, state legislatures,
11 the FCC and the US Congress. I am also responsible for facilitating the working
12 relationship of ITC^DeltaCom with other telecommunications companies
13 including incumbent local exchange companies, competitive local exchange
14 companies and other providers.
15

16 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A: The purpose of my testimony is to provide DeltaCom's position on certain generic
18 issues filed with the Commission by CompSouth and BellSouth and the non-
19 generic issues identified in Deltacom's petition for mediation and dispute
20 resolution. I will also discuss the status of DeltaCom's bilateral TRO/TRRO
21 amendment negotiations with BellSouth and describe the process that allows
22 DeltaCom to participate in the generic proceedings as well as two-party dispute
23 resolution proceedings.

10 Q: ARE THERE ANY OTHER CHANGE OF LAW ISSUES NOT RELATED TO
11 THE TRO/TRRO THAT HAVE BEEN RAISED?

12 A: Yes. The Pick and Choose Order and the Core ISP Remand Order. However, I
13 will focus on the Core ISP Remand decision. The Core ISP remand order states
14 that the growth caps and new markets rule no longer applies. BellSouth takes the
15 position that the template language in the interconnection agreement should not
16 incorporate this FCC order and points to the fact that BellSouth has reached
17 individual settlements with certain carriers. DeltaCom submits that each such
18 specific negotiation should be between that carrier and BellSouth but that on a
19 generic basis and certainly in a template agreement, the language offered in the
20 template should be compliant with the most recent orders – including those
21 orders that BellSouth disfavors. For the template agreement, DeltaCom
22 recommends the language noted in Exhibit JW-1.

23 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

1 A: Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served by e-mail transmission and/or by U.S. mail, upon the following this 3rd day of October, 2005:

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