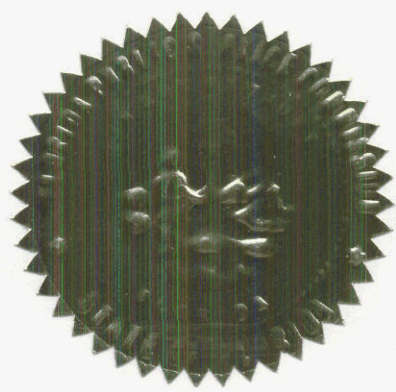


BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of : DOCKET NO. 980281-TP
:
Complaint of MCI Metro Access:
Transmission Services, Inc. :
against BellSouth :
Telecommunications, Inc. :
for breach of approved :
interconnection agreement. :



VOLUME 2
Pages 147 through 270

PROCEEDING: HEARING

BEFORE: CHAIRMAN JULIA L. JOHNSON
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER JOE GARCIA
COMMISSIONER E. LEON JACOBS, JR.

DATE: Wednesday, August 5, 1998

TIME: Commenced at 9:30 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JOY KELLY, CSR, RPR
Chief, Bureau of Reporting

APPEARANCES: (As heretofore mentioned.)

DOCUMENT NUMBER - DATE

08494 AUG 11 88

FPSC-RECORDS/REPORTING

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2

I N D E X

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WITNESSES - VOLUME 2

5

NAME

PAGE NO.

6

BRYAN GREEN

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Direct Examination By Mr. Melson 149

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Cross Examination By Ms. White 212

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late-filed exhibits 213 213

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P R O C E E D I N G S

(Hearing reconvened at 12:15 p.m.)

(Transcript follows in sequence from

Volume 1.)

CHAIRMAN JOHNSON: We're going to go back on the record. MCI.

MR. MELSON: MCI calls Bryan Green.

- - - - -

BRYAN GREEN

was called as a witness on behalf of MCImetro Access Transmission Services, Inc. and, having been duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. MELSON:

Q Would you please state your name and address?

A My name is Bryan Keith Green, and my business address 2520 Northwinds Parkway, Alpharetta, Georgia 30022.

Q By whom are you employed and in what capacity?

A I am employed by MCI. I'm the senior manager responsible for systems implementation for the Eastern Financial Operations organization in the south.

1 Q Have you prefiled direct testimony in this
2 docket consisting of 30 pages?

3 A Yes.

4 Q Do you have any changes or corrections to
5 that testimony?

6 A No, I do not.

7 Q If I were to ask you the same questions
8 today would your answers be the same?

9 A Yes, they would.

10 **MR. MELSON:** I ask Mr. Green's direct
11 testimony be inserted into the record as though read.

12 **CHAIRMAN JOHNSON:** It will be so inserted.

13 Q **(By Mr. Melson)** Do you have 16 exhibits
14 attached to your direct testimony?

15 A Yes.

16 Q Do you have any changes or corrections to
17 those exhibits?

18 A No, I do not.

19 **MR. MELSON:** I'd ask Exhibits BG-1 through
20 BG-16 be identified as composite Exhibit 6.

21 (Exhibit 6 marked for identification.)

22 **CHAIRMAN JOHNSON:** It will be identified as
23 composite Exhibit 6.

24 Q **(By Mr. Melson)** Mr. Green, have you also
25 prefiled rebuttal testimony consisting of 17 pages?

1 **A** Yes.

2 **Q** Do you have any changes or corrections to
3 your rebuttal testimony?

4 **A** No, I do not.

5 **Q** If I were to ask you the same questions
6 today would your answers be the same?

7 **A** Yes, they would.

8 **MR. MELSON:** I'd ask that Mr. Green's
9 rebuttal testimony be inserted into the record as
10 though read.

11 **CHAIRMAN JOHNSON:** It will be so inserted.

12 **Q** **(By Mr. Melson)** Did you have nine exhibits
13 attached to your rebuttal testimony, mainly Exhibits
14 BG-17 to 25?

15 **A** Yes, I did.

16 **Q** Do you have any changes or corrections to
17 those exhibits?

18 **A** No, I do not.

19 **MR. MELSON:** Madam Chairman, I'd ask that
20 BG-17 through 25 be identified as Composite Exhibit 7.

21 **CHAIRMAN JOHNSON:** BG-17 through 25 will be
22 identified as Composite 7.

23 (Exhibit 7 marked for identification.)

24

25

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY OF BRYAN GREEN**

3 **ON BEHALF OF**

4 **MCIMETRO ACCESS TRANSMISSION SERVICES, INC.**

5 **DOCKET NO. 980281-TP**

6 **May 4, 1998**

7

8 **Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION.**

9 A. My name is Bryan Green. My business address is 2520 Northwinds Parkway,
10 Alpharetta, Georgia 30004. I am employed by MCI Telecommunications
11 Corporation (MCI) in the Southern Financial Operations group as a Senior
12 Manager. MCImetro Access Transmission Services, Inc. (MCImetro) is the MCI
13 subsidiary that provides local telephone service. My responsibilities involve
14 implementing Operation Support Systems (OSS) that support MCImetro's entry
15 into local telephone markets. Among other things, I deal with BellSouth and other
16 ILECs and industry forums to facilitate OSS implementation.

17

18 **Q. PLEASE PROVIDE INFORMATION ON YOUR BACKGROUND AND**
19 **EXPERIENCE.**

20 A. Before coming to MCI last year, I worked for Pacific Bell for more than eleven
21 years. I held a number of positions with Pacific Bell ranging from data
22 communications manager, data network manager, data network design and sales and
23 new product development. The majority of my tenure with Pacific Bell was in sales
24 and marketing as a system design consultant. In this role, I was responsible for the
25 design and sale of data networks to medium and large business customers. Finally, I

1 was a product manager with responsibility for new products and market
2 development. I obtained a Bachelor of Science degree in Business Information and
3 Computing Systems in 1984 from San Francisco State University.

4
5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 A. The purpose of my testimony is to provide information to the Commission
7 concerning BellSouth's failure to comply with its duties under the Interconnection
8 Agreement (Agreement) as they relate to OSS. My testimony concerns Counts One
9 through Eight of MCImetro's complaint. Ronald Martinez, among other things, will
10 discuss the Agreement as it relates to those counts.

11
12 **GENERAL CLAIM**

13 ***COUNT ONE: FAILURE TO PROVIDE OSS INFORMATION***

14 **Q. HOW IS MCIMETRO AFFECTED BY BELLSOUTH'S FAILURE TO**
15 **PROVIDE INFORMATION CONCERNING THE OSS SYSTEMS AND**
16 **RELATED DATABASES IT USES FOR ITS OWN CUSTOMERS?**

17 A. When BellSouth refuses to provide MCImetro information concerning BellSouth's
18 systems and databases, it prevents us from learning all of the capabilities we should
19 expect BellSouth to afford us. When I attended the BellSouth OSS demonstration
20 with Ron Martinez and others in Florida last year, for example, I was surprised to
21 learn how much better BellSouth's own OSS is than the OSS it provides to
22 MCImetro. We need to have the same level of OSS support as BellSouth provides
23 to itself to be able to compete with BellSouth; until we learn what all of BellSouth's
24 capabilities are for itself and obtain those capabilities for MCImetro, we will not be
25 able to compete on a level playing field.

1

2 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THIS ISSUE WITH**
3 **BELLSOUTH?**

4 A. Yes, as described in the testimony of Ronald Martinez, MCImetro has been
5 requesting this information for some time. Most recently, MCImetro requested this
6 information by letter dated December 24, 1997 (December 24 letter), a copy of
7 which is attached as Exhibit 6 (BG-1). In its response dated February 11, 1998
8 (February 11 letter) BellSouth again refused to provide the requested information.
9 A copy of the February 11 letter is attached as Exhibit 6 (BG-2).

10

11 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
12 **ONE?**

13 A. MCImetro is requesting that BellSouth be required to permit MCImetro to review
14 (i) a detailed listing of all OSS systems that BellSouth uses; (ii) all technical
15 specifications for each of the listed systems, including but not limited to information
16 explaining what functions the system performs, how the system performs those
17 functions, what data bases and other systems it interacts with and whether an
18 interface can be built to the system; (iii) a detailed listing of each of the data bases
19 that are used by BellSouth's OSS systems; and (iv) a description of each of the
20 listed data bases, including but not limited to a data base layout specifically
21 identifying the characteristics of all data base fields.

22

23 **CLAIMS RELATING TO PRE-ORDERING**

24 **Q. BEFORE DISCUSSING EACH OF THE PRE-ORDERING CLAIMS,**
25 **PLEASE GIVE SOME EXPLANATION OF PRE-ORDERING AND THE**

1 **INTERFACES INVOLVED. PLEASE START BY EXPLAINING WHAT**
2 **PRE-ORDERING IS.**

3 A. The pre-order function involves the exchange of information between carriers prior
4 to, and in anticipation of, the placing of an actual order. Pre-order functions
5 include, for example, address validation, telephone number reservation, and access
6 to customer service records (CSRs).

7
8 **Q. WHAT SYSTEM DOES BELLSOUTH PROVIDE TO ALTERNATIVE**
9 **LOCAL EXCHANGE CARRIERS FOR PRE-ORDERING?**

10 A. BellSouth offers its Local Exchange Navigation System (LENS) as its means for
11 Alternative Local Exchange Carriers (ALECs) to access pre-ordering functions.
12 But LENS is wholly inadequate both because LENS is not a system-to-system
13 interface and because the functionality offered through LENS is inferior to the
14 functionality available to BellSouth itself. On December 15, 1997, BellSouth
15 provided incomplete Common Gateway Interface specifications for LENS, which, if
16 successfully implemented, would provide an enhanced screen scraping capability. I
17 will discuss LENS with the CGI enhancement separately from the general discussion
18 of LENS below.

19
20 **Q. GENERALLY, WHY IS LENS DEFICIENT?**

21 A. In addition to being proprietary, LENS is deficient because it is a dedicated access
22 system that essentially involves the provision of an inferior version of BellSouth's
23 own OSS terminals (or screens) to MCImetro. Because LENS does not connect
24 ALEC systems to BellSouth systems, it requires MCImetro customer service
25 representatives to first use BellSouth systems and then use MCImetro's own internal

1 systems. In contrast, a BellSouth representative only has to use BellSouth's own
2 internal systems.

3

4 **Q. WHAT PROBLEMS ARE CAUSED BY THE LACK OF AN**
5 **APPLICATION-TO-APPLICATION INTERFACE?**

6 A. The dual data entry required of ALECs not only creates delay while the customer
7 waits on the line, it also inevitably results in order entry errors that impact
8 customers' requested services.

9

10 The lack of an application-to-application interface also forces MCImetro to rely on
11 the pre-ordering screens developed in LENS. With an application-to-application
12 interface, MCImetro could take the underlying data and present it to its customer
13 service representatives the way they wanted to. This would free MCImetro from
14 the strictures of BellSouth's design and allow MCImetro to compete to design
15 superior systems. This is particularly important for a national ALEC such as
16 MCImetro who desires to present pre-ordering information to its customer service
17 representatives in a uniform fashion no matter the region. With an application-to-
18 application interface, for example, MCImetro can design its screens to provide a
19 common name for a feature across regions, rather than having feature names vary
20 from region to region depending on the name given by the regional Bell operating
21 company (RBOC).

22

23 **Q. DOES THE LACK OF APPLICATION-TO-APPLICATION INTERFACE**
24 **CAUSE OTHER PROBLEMS?**

1 A. Yes. MCImetro customer service representatives must log into both their own
2 system and the RBOC's system and they face a greater risk of being unable to
3 access pre-order information at all because one of the systems is down. The greater
4 risk of down time exists because a ALEC will be unable to obtain pre-ordering
5 information and enter orders whenever: 1) BellSouth's back-end systems are down;
6 2) the ALEC's internal systems are down; or 3) LENS is down. BellSouth's retail
7 operation is only delayed by the first of these exigencies. If BellSouth provided an
8 application-to-application interface, on the other hand, MCImetro would be more
9 like BellSouth: it would only be precluded from entering orders when BellSouth's
10 backend systems were down or when MCImetro's own systems were down. In
11 other words, there is more potential for "down" time with LENS than with an
12 application-to-application interface.

13

14 **Q. WHAT DID THE COMMISSION CONCLUDE ABOUT LENS?**

15 A. In the order issued by the Commission in the Section 271 proceedings held in
16 Docket No. 960786-TL (271 Order), the Commission contrasted BellSouth's
17 integrated systems with LENS, which it described as a human-to-machine interface.
18 271 Order, pp. 81, 157.

19

20 **Q. WHAT DID THE FCC CONCLUDE ABOUT LENS?**

21 A. The FCC concluded that
22 new entrants using LENS cannot readily transfer information
23 electronically from LENS to their operations support systems
24 and deploy an integrated pre-ordering and ordering system. In
25 contrast, BellSouth's retail operation uses an integrated pre-

1 ordering and ordering system. Given that BellSouth has
2 chosen not to deploy a machine-to-machine interface for
3 competing carriers and has impeded the efforts of competing
4 carriers to pursue other methods of connecting LENS
5 electronically to their operations support systems and to the
6 EDI interface, we conclude that BellSouth has failed to
7 deploy a system that offers to competing carriers equivalent
8 access to OSS functions for pre-ordering.

9 In re Application of BellSouth Corporation Pursuant to Section 271 of the
10 Communications Act of 1934, as amended, to Provide In-Region, InterLATA
11 Services in South Carolina, CC Docket No. 97-208, December 24, 1997, ¶ 166
12 (FCC South Carolina Order). See also In re Application of BellSouth Corporation
13 Pursuant to Section 271 of the Communications Act of 1934, as amended, to
14 Provide In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231,
15 February 3, 1998, ¶¶ 49-55 (FCC Louisiana Order).

16
17 **Q. DOES THE CGI ENHANCEMENT TO LENS CORRECT ITS**
18 **DEFICIENCIES?**

19 A. No. In the first place, BellSouth has refused to cooperate with MCImetro in
20 providing complete CGI specifications. MCImetro has made repeated requests
21 beginning in May 1997 and extending over a period of months for the LENS
22 specifications that would be necessary for MCImetro to develop the applications
23 needed to connect its systems to LENS. BellSouth first provided a user's guide
24 rather than specifications, then provided several sets of specifications that were
25 incomplete and out of date.

1

2

Only after MCImetro filed an enforcement claim in Georgia in November 1997 seeking (among other things) the CGI specifications did BellSouth provide a more up to date set of specifications on December 15, 1997.

5

6

The FCC expressly concluded that MCImetro had requested the CGI specifications, “but that BellSouth has not met its obligation to provide the complete, detailed, and updated specifications that new entrants need to use CGI to connect electronically their operations support systems to BellSouth’s interface.” FCC South Carolina Order ¶ 161. See also FCC Louisiana Order ¶ 54.

10

11

12 **Q. HOW DOES MCIMETRO PLAN TO USE THE CGI SPECIFICATIONS?**

13

A. MCImetro wishes to use the CGI interface for the limited purpose of developing an enhanced screen scraping capability for CSRs using the LENS interface, as an interim measure before the development of an industry standard pre-ordering interface.

14

15

16

17

18 **Q. DO THE CGI SPECIFICATIONS PROVIDED ON DECEMBER 15, 1997**
19 **PROVIDE ALL THE NECESSARY INFORMATION?**

19

20

A. No. MCI’s information technology staff has reviewed the specifications and determined that they lack a CSR record layout and a LENS data dictionary. The specifications do contain some of the information that typically would be found in a CSR record layout or data dictionary, but that information is insufficient for MCI’s development purposes.

21

22

23

24

25

1 **Q. PLEASE EXPLAIN WHAT YOU MEAN BY CSR RECORD LAYOUT AND**
2 **DATA DICTIONARY.**

3 A. The CSR record layout is a visual representation of the physical layout of the data
4 contained in a CSR. Usually the CSR record layout is a picture that describes all the
5 field names, field labels, field lengths and their positioning when displayed on a
6 computer screen or when printed on paper. It also describes the positioning of all
7 the fields relative to one another. The data dictionary is a dictionary of all the data
8 elements contained in CSRs provided by LENS as well as all the data elements used
9 to develop the LENS application. A data dictionary is a document presented in a
10 dictionary style, in alphabetical order, beginning with the data element (or term) and
11 followed by its definition including the type of data (such as integer, alpha, string or
12 decimal), attributes, parameters, location within the application, exception rules and
13 examples of usage.

14
15 **Q. WHY DOES MCIMETRO NEED THE CSR RECORD LAYOUT AND LENS**
16 **DATA DICTIONARY?**

17 A. MCImetro is able to obtain CSR data using the CGI interface, but MCImetro has
18 been unable to interpret the data, primarily because it is transmitted as a continuous
19 string of characters with no indication as to how it is to be "parsed" so it can be
20 presented on a computer screen to an MCImetro customer service representative.

21
22 **Q. HAS MCIMETRO REQUESTED BELLSOUTH TO PROVIDE THE CSR**
23 **RECORD LAYOUT AND LENS DATA DICTIONARY?**

24 A. Yes, but BellSouth has refused to provide them.

25

1 **Q. ONCE IMPLEMENTED, WILL THE LENS CGI INTERFACE PROVIDE**
2 **AN ACCEPTABLE PRE-ORDERING INTERFACE?**

3 A. No. The CGI LENS interface is proprietary and nonstandard and subject to the
4 general deficiencies of LENS that I already have described. Unlike an application-
5 to-application interface that operates largely independent of a LENS type front-end
6 system, new development costs would accrue each time that BellSouth changed the
7 functionality of LENS, because this would change the way in which the screen
8 scraper needed to grab data. Further, development of screen scraping is at best a
9 make-shift solution; it is far inferior to use of a standardized application-to-
10 application interface. A screen scraping application would go into BellSouth's
11 backend systems and act as if it were a human using LENS -- it would work through
12 each of the BellSouth screens to grab BellSouth's data and put it into MCImetro's
13 screens. In contrast, an application-to-application interface would grab the data
14 directly with no need to work through BellSouth's screens.

15
16 **Q. HOW DO BELLSOUTH'S INTERNAL SYSTEMS COMPARE TO THE**
17 **OSS IT PROVIDES TO ALECS?**

18 A. The problems I have described relating to LENS generally do not exist in
19 BellSouth's internal systems. BellSouth's systems provide it with superior
20 capabilities with respect to address validation, access to CSR data, telephone
21 number reservation, due date calculation, and determination of feature availability.

22
23 **Q. WHAT PRE-ORDERING SYSTEM SHOULD BELLSOUTH USE INSTEAD**
24 **OF LENS?**

1 A. BellSouth should be required to provide a pre-ordering interface based on emerging
2 industry standards that support security (nonrepudiation) and data integrity that can
3 be integrated with ALECs' ordering systems. Although national standards for
4 electronic interfaces for pre-ordering have not yet been approved, the industry has
5 agreed, through consensus in the ECIC Committee of ATIS, that EDI via TCP/IP
6 SSL3 is an appropriate interim interface for pre-ordering. EDI TCP/IP/SSL3 is a
7 particularly rapid form of EDI that connects the ALEC's systems to the RBOC's
8 system and enables pre-ordering information to be sent in near real-time. The EDI
9 subcommittee already has mapped the vast majority of data elements needed for this
10 interface; it has done so in the process of developing an EDI interface for ordering.
11 Although inferior to the electronic bonding solution that MCI advocates as the long
12 term solution the industry should adopt, EDI TCP/IP/SSL3 is a good solution for
13 pre-ordering for the intermediate term.

14
15 **Q. WHAT POSITION HAS BELL SOUTH TAKEN CONCERNING THE**
16 **ADOPTION OF EDI TCP/IP SSL3?**

17 A. In mid-1997, MCImetro requested BellSouth to discuss the development of EDI
18 TCP/IP SSL3 as a pre-ordering interface. BellSouth informed MCImetro in late
19 1997 that it intends to develop a new interface called the Application Program
20 Interface (API) using another protocol called CORBA. BellSouth has informed
21 MCImetro that the API interface will be designed for medium sized ALECs that do
22 not use the EDI ordering interface. MCImetro has requested that BellSouth also
23 support the EDI TCP/IP/SSL3 protocol, but to date, BellSouth has made no
24 commitment to support it.

25

1 **Q. WHAT IS THE CURRENT STATUS OF MCIMETRO'S ABILITY TO**
2 **INTEGRATE THE PRE-ORDERING AND ORDERING INTERFACES?**

3 A. Today, MCImetro has no effective way of integrating the pre-ordering and ordering
4 functions.

5
6 ***COUNT TWO: FAILURE TO PROVIDE A DOWNLOAD OF THE SAG DATA***

7 **Q. WHY IS THE ADDRESS VALIDATION FUNCTION IMPORTANT?**

8 A. Perhaps the most important pre-order function is address validation. Prior to
9 placing an order a ALEC must validate the customer's address against the RBOC's
10 database to ensure that the address is entered in the exact format present in the
11 RBOC's systems. Even slight differences, such as entering 19th Street instead of
12 19th St., can result in rejection of an order. BellSouth recently has acknowledged
13 that invalid address constitutes the second most common reason for order rejection.
14 Further, MCImetro has been informed by BellSouth that an address must be correct
15 before it can be entered into the E911 database. Orders rejected because of an
16 invalid address increase the cost of doing business and potentially delay a customer's
17 service.

18
19 **Q. DOES BELL SOUTH CURRENTLY PROVIDE AN ACCEPTABLE MEANS**
20 **OF ACCESSING THE RSAG DATA?**

21 A. No. Currently BellSouth requires ALECs to access the Regional Street Address
22 Guide (RSAG) through LENS or Interexchange Carrier Reference Validation
23 (ICREF). Neither of these interfaces provides the RSAG data to ALECs so they
24 can integrate their pre-ordering and ordering functions, and tailor their usage of the
25 data to their own needs. Rather, LENS and ICREF provide on-line access to RSAG

1 data only on a transaction-by-transaction basis for only one address at a time.
2 ALECs remain completely dependent on BellSouth for access to this critical
3 information. Thus, for example, because the address validation system has
4 scheduled outage totaling forty-two hours per week, ALECs are limited by
5 BellSouth's system availability.

6
7 **Q. WHY DOES MCIMETRO NEED A DOWNLOAD OF THE RSAG?**

8 A. A download of the RSAG with periodic updates would allow MCI metro to
9 electronically enter the information into its own system to be available to customer
10 service representatives. That way MCI metro representatives would not have to use
11 the BellSouth system and then re-enter the data manually into the MCI metro system.
12 They could simply use the MCI metro system to validate addresses and thus
13 substantially reduce the risk of rejected orders.

14
15 **Q. HAS MCIMETRO REQUESTED THAT BELL SOUTH PROVIDE A
16 DOWNLOAD OF THE SAG DATA?**

17 A. Yes, several times. In response to my initial request for a download of the RSAG,
18 BellSouth stated in an E-Mail dated June 13, 1997 that BellSouth was unable to
19 provide a download because of the size of the RSAG and the daily activity
20 associated with it, and because MCI metro and other ALECs had access to the
21 RSAG through LENS and ICREF. A copy of this E-Mail is attached to my
22 testimony as Exhibit ___ (BG-3). By letter dated June 16, 1997, MCI metro again
23 requested BellSouth to provide SAG data. A copy of this letter is attached as
24 Exhibit ___ (BG-4). By letter dated June 26, 1997, BellSouth responded and again
25 refused to provide a download of the RSAG, stating that BellSouth was "unable to

1 provide the initial SAG data and daily updates in batch form” A copy of this
2 letter is attached as Exhibit 6 (BG-5).

3
4 MCImetro requested a download of the RSAG again by letter dated August 18,
5 1997, in which it was pointed out that MCImetro “is capable of accepting an
6 electronic download of this data via NDM [Network Data Mover] until a regular
7 mechanized daily batch process can be implemented to accommodate daily updates.”

8 A copy of this letter is attached as Exhibit 6 (BG-6). BellSouth responded by
9 letter dated August 20, 1997, stating that “the RSAG database files are extremely
10 voluminous for downloading” and that because the database changes so rapidly, “it
11 would be outdated by the time MCI would be in receipt of the database files.”

12 BellSouth further contended, for the first time, that the RSAG technical
13 specifications were proprietary. The letter suggested that MCImetro submit a bona
14 fide request (“BFR”) if it continued to want a download of the RSAG. A copy of
15 this letter is attached as Exhibit 6 (BG-7).

16
17 **Q. WERE BELLSOUTH’S RESPONSES TO MCIMETRO’S REQUESTS**
18 **ACCEPTABLE TO MCIMETRO?**

19 A. No. As discussed in the testimony of Ronald Martinez, the Agreement entitles
20 MCImetro to a download of the SAG data with updates the same day changes are
21 made. Access via LENS or ICREF does not comply with the Agreement.

22
23 BellSouth’s unsubstantiated contention that the RSAG is too voluminous cannot
24 justify its refusal to comply with the Agreement. The time for asserting that

1 objection was when the Agreement was negotiated, not when it came time to
2 comply with it.

3

4 Likewise, BellSouth's assertion that the RSAG database changes rapidly does not
5 excuse BellSouth's failure to perform. Indeed, the fact that it changes often only
6 emphasizes MCImetro's need to obtain frequent updated information. The
7 Agreement contemplated that updates would be provided, and MCImetro stands
8 ready to receive updates and incorporate them into its systems.

9

10 BellSouth's claim that the RSAG technical specifications are proprietary lacks
11 validity for similar reasons. BellSouth has failed to state why it considers the
12 specifications to be proprietary, and, in any event, to the extent that the disclosure of
13 proprietary information is necessary for BellSouth to comply with its contractual
14 obligations, BellSouth must make the disclosure.

15

16 Finally, BellSouth's suggestion that MCImetro submit a BFR is misplaced because
17 MCImetro is entitled to a download of the SAG data at no cost, and a BFR only
18 would delay matters. Under the BFR process, MCImetro submits a request to
19 change a service or element provided under the Agreement, and BellSouth submits a
20 firm quote for the requested service or capability within ninety days of receiving the
21 BFR. Agreement, Part A, Exhibit 1. No BFR is necessary to request a download of
22 the SAG data because the Agreement requires that BellSouth provide it.

23

24 **Q. HAS MCIMETRO MADE ANY ADDITIONAL ATTEMPTS TO OBTAIN**
25 **THE SAG DATA?**

1 A. Yes. By letter dated September 18, 1997, MCI Regional Vice President Marcel
2 Henry requested BellSouth to provide the RSAG. A copy of this letter is attached
3 to my testimony as Exhibit 6 (BG-8). BellSouth initially responded by letter
4 dated October 10, 1997, in which it stated that "BellSouth is open to working with
5 MCI to understand the information that MCI needs out of RSAG and to develop the
6 time and costs required to develop this enhancement." A copy of this letter is
7 attached as Exhibit 6 (BG-9). Then, by letter dated November 13, 1997,
8 BellSouth Interconnection Services President Mark Feidler stated that "[w]ithin the
9 next two weeks, BellSouth will be able to provide you cost estimates and the time
10 and price for developing the detailed design, project plan, and a firm quote for the
11 overall delivery." A copy of this letter is attached as Exhibit 6 (BG-10).

12

13 **Q. DID BELLSOUTH EVENTUALLY GIVE A QUOTE FOR PROVIDING A**
14 **DOWNLOAD OF THE RSAG?**

15 A. Yes. By letter dated December 2, 1997, BellSouth proposed to provide an extract
16 of the RSAG database based on the following cost structure: \$30,000 for a project
17 plan, a timeline and a final proposal; \$538,030 for total start-up costs for the new
18 connections; and \$8,650 per month on an ongoing basis. A copy of this letter is
19 attached as Exhibit 6 (BG-11). By letter dated December 16, 1997, MCI metro
20 rejected this proposal because the Agreement entitles MCI metro to obtain a
21 download of the RSAG at no cost. A copy of this letter is attached as Exhibit 6
22 (BG-12). MCI metro restated its position in the December 24 letter and BellSouth
23 again rejected it in the February 11 letter.

24

1 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
2 **TWO?**

3 A. MCImetro is requesting that BellSouth be required to provide download of the
4 RSAG to MCImetro and then provide downloads of changes to the RSAG on the
5 same day as the changes to the data are made, at no cost to MCImetro. MCImetro
6 also is requesting that BellSouth be required to provide a description of the RSAG
7 data base, including but not limited to a database layout specifically identifying all
8 database fields.

9
10 ***COUNT THREE: FAILURE TO PROVIDE PARITY IN DUE DATE INTERVALS***

11 **Q. WHAT DOES THE DUE DATE FUNCTION ENABLE A CUSTOMER**
12 **SERVICE REPRESENTATIVE TO DO?**

13 A. The due date function enables a customer service representative to tell the customer
14 when he or she can expect service to be turned up. To provide this information
15 accurately to the customer over the telephone, the customer service representative
16 must be able to access due date information electronically through an application-to-
17 application interface and then submit an order electronically that immediately is
18 processed by BellSouth's systems.

19
20 **Q. PLEASE DESCRIBE YOUR UNDERSTANDING OF HOW BELL SOUTH'S**
21 **CUSTOMER SERVICE REPRESENTATIVES ARE ABLE TO**
22 **CALCULATE DUE DATES.**

23 A. For BellSouth's own customer service representatives, BellSouth's systems
24 calculate due dates based on the availability of BellSouth's work force, the type and
25 size of a customer's order and other factors. The customer service representative

1 can then quote that due date over the phone to the customer. On the screen
2 presented to a BellSouth customer service representative in BellSouth's Regional
3 Navigation System (RNS), the first available due date is automatically calculated
4 and highlighted in green. In addition, because a BellSouth order flows immediately
5 from pre-ordering to ordering, the due date calculation will not have changed by the
6 time the order is submitted, so the due date can be quoted much more confidently to
7 the customer. My understanding is that BellSouth's system for business orders
8 works much the same way, although it is not as user friendly.

9
10 **Q. DOES BELL SOUTH PROVIDE THE SAME DUE DATE FUNCTIONALITY**
11 **TO MCIMETRO?**

12 A. No. LENS has no method of calculating due dates for unbundled network element
13 (UNE) orders. None of the due date information in LENS applies to UNEs. To the
14 extent MCI metro relies on a UNE-based entry strategy, therefore, it will lack the
15 same capabilities that BellSouth affords itself.

16
17 If MCI metro were to pursue a resale strategy (which it does not intend to do under
18 current conditions), the due date capability available to it would not be much better.
19 In the past, BellSouth has indicated that its Direct Order Entry Support Applications
20 Program (DSAP) used by BellSouth representatives is available for use by ALECs.
21 This is only true, however, if ALECs are using LENS for ordering. Because
22 MCI metro will not be using LENS for ordering, MCI metro will not have access to
23 BellSouth's due date calculation function.

24

1 **Q. PLEASE DESCRIBE THE DUE DATE RESERVATION FUNCTION IN**
2 **THE INQUIRY MODE OF LENS.**

3 A. In reality, MCImetro only will have access to LENS' own interval calendar for pre-
4 ordering (provided in the inquiry rather than the firm order mode of LENS). In
5 order to use this function, however, an MCImetro customer service representative
6 must rely on a cumbersome presentation screen to manually calculate a due date
7 after taking into account several separate pieces of information -- typically
8 installation intervals, normal working days, and days the particular end office may be
9 closed. Finally, because there is a gap between MCImetro's use of pre-ordering
10 functions and submission of an MCImetro order, by the time MCImetro submits the
11 order, the dates calculated as available using LENS might no longer be available.
12 As a result, MCImetro cannot reliably quote this date to its customer.

13

14 **Q. WHAT HAS THE COMMISSION CONCLUDED WITH RESPECT**
15 **BELLSOUTH'S DUE DATE RESERVATION FUNCTION OFFERED TO**
16 **MCIMETRO?**

17 A. The Commission twice concluded that "BellSouth has not offered an efficient due
18 date recognition system for LENS users." 271 Order, pp. 81, 158.

19

20 **Q. WHAT HAS THE FCC CONCLUDED WITH RESPECT TO**
21 **BELLSOUTH'S DUE DATE RESERVATION FUNCTION OFFERED TO**
22 **ALECS?**

23 A. The FCC recently agreed that BellSouth does not offer nondiscriminatory
24 access to due dates. FCC South Carolina Order ¶ 167; FCC Louisiana
25 Order ¶ 56. As the FCC stated:

1 New entrants do not obtain actual due dates from
2 LENS during the pre-ordering stage. Instead, the
3 actual, firm due date is assigned once BellSouth
4 processes the order through SOCS. A new entrant
5 therefore will not be informed of the actual due date
6 until it receives a firm order confirmation (FOC) from
7 BellSouth.

8 FCC South Carolina Order ¶ 168. See also Louisiana Order ¶ 56. The FCC
9 went on to note in the South Carolina case that even though BellSouth
10 representatives do not receive actual due dates, they can be confident of the
11 due dates they quote customers because their orders are processed without
12 the same delays that ALECs experience. Because of these delays, ALECs
13 cannot give dates to customers with the same confidence. FCC South
14 Carolina Order ¶ 168; FCC Louisiana Order ¶ 57.

15

16 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THIS ISSUE WITH**
17 **BELLSOUTH?**

18 A. Yes. In its December 24 letter, MCImetro requested that BellSouth provide
19 through a system-to-system interface the capability to determine due dates efficiently
20 and to expedite those due dates when appropriate. In its February 11 letter,
21 BellSouth did not agree to comply with this request.

22

23 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
24 **THREE?**

1 A. MCImetro is requesting that BellSouth be required to provide to MCImetro the
2 same capability to calculate due dates that BellSouth has through a system that can
3 be integrated with MCImetro's ordering system.

4

5 ***COUNT FOUR: FAILURE TO PROVIDE PARITY IN ACCESS TO TELEPHONE***
6 ***NUMBERS AND TELEPHONE NUMBER INFORMATION***

7 **Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO**
8 **THE TELEPHONE NUMBER RESERVATION FUNCTION?**

9 A. No. LENS does not permit MCImetro to integrate the telephone number
10 reservation function with its ordering system. With LENS, MCImetro encounters
11 the problems of dual data entry and dependence on the availability of LENS. In
12 RNS and BellSouth's DOE system for business orders, the telephone number
13 reservation function is integrated with the ordering function.

14

15 **Q. IS THE TELEPHONE NUMBER RESERVATION FUNCTION**
16 **DISCRIMINATORY IN ANY OTHER RESPECT?**

17 A. Yes. LENS only allows a customer service representative to reserve a maximum of
18 six telephone numbers at a time for a customer (as compared to 25 telephone
19 numbers that can be reserved by BellSouth for its customers). LENS is therefore
20 particularly cumbersome to use for big business customers. In contrast to the
21 process that MCImetro must follow in LENS, a BellSouth customer service
22 representative using RNS automatically sees an "assigned" telephone number which
23 he or she can offer to the customer; only if the customer does not want this number
24 does the BellSouth representative have to use the number reservation function.

25

1 Q. **HOW DOES THE ABILITY OF BELLSOUTH REPRESENTATIVES TO**
2 **VIEW NXX CODES COMPARE TO THAT OF ALEC**
3 **REPRESENTATIVES?**

4 A. In offering customers a choice of numbers, an ALEC has no way of viewing the
5 NXX codes available to the customers; in contrast, a BellSouth representative using
6 RNS can easily view such codes. This is also true in BellSouth's business system
7 DOE as can easily be seen by comparing the number reservation screen in DOE with
8 the comparable screen in LENS.

9

10 Q. **WHAT DID THE COMMISSION CONCLUDE CONCERNING**
11 **TELEPHONE NUMBER ISSUES?**

12 A. The Commission concluded that an ALEC cannot reserve the same number of phone
13 numbers through LENS as BellSouth can in RNS; that RNS, unlike LENS,
14 automatically assigns a phone number when an order is being taken for a new
15 customer; and unlike RNS and DOE, LENS does not provide a list of available
16 NXXs for a specific address. 271 Order, pp. 82, 157.

17

18 Q. **HAS MCIMETRO ATTEMPTED TO RESOLVE THESE ISSUES WITH**
19 **BELLSOUTH?**

20 A. Yes. MCImetro raised these issues in its December 24 letter. In its February 11
21 response, BellSouth did not address these issues.

22

23 Q. **WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
24 **FOUR?**

1 A. MCImetro is requesting that BellSouth be required to permit MCImetro to reserve
2 telephone numbers through a system that can be integrated with MCImetro's
3 ordering system. Further, MCImetro is requesting that BellSouth be required to
4 permit MCImetro to reserve the same number of telephone numbers per order as
5 BellSouth and to provide the same NXX information that is provided to BellSouth
6 representatives.

7

8 ***COUNT FIVE: FAILURE TO PROVIDE PARITY IN ACCESS TO USOC***
9 ***INFORMATION***

10 **Q. WHAT ARE USOCS AND WHAT IS THEIR SIGNIFICANCE?**

11 A. "USOCs" are Universal Service Order Codes corresponding to BellSouth service
12 features. BellSouth has acknowledged that it is essential for ALECs to have
13 accurate information on USOCs and associated field identifiers (FIDs) so they can
14 place valid orders. There are thousands of USOCs. BellSouth recently has
15 acknowledged that USOC and FID errors are the most common cause of rejected
16 orders. To have accurate information on USOCs and FIDs, an ALEC must know
17 the states in which a specific USOC is valid and which FIDs are associated with
18 each USOC.

19

20 **Q. HOW DOES BELLSOUTH PROVIDE USOC AND FID INFORMATION TO**
21 **MCIMETRO?**

22 A. Currently, BellSouth provides USOCs and FIDs in the Local Ordering Guide ("LEO
23 Guide") and provides the USOCs on a website. The USOC list on the BellSouth
24 web page does not indicate the states in which the USOCs are valid, and thus the
25 web page list must be used in conjunction with another source -- the LEO Guide.

1 The website also does not list FID information, so the LEO Guide must be
2 referenced to obtain that data as well. This process of referencing two different
3 sources for the necessary USOC and FID information is cumbersome and inefficient.
4 To make matters worse, updates to the USOC website do not highlight changes,
5 making it more difficult for MCImetro to incorporate BellSouth's information into
6 MCImetro's own systems.

7
8 **Q. CAN MCIMETRO INTEGRATE USOC INFORMATION INTO ITS**
9 **SYSTEMS BY DOWNLOADING USOC INFORMATION FROM THE**
10 **WEBSITE?**

11 A. No. MCImetro is not able to download USOCs from the website such that USOC
12 information can be integrated into its front-end pre-ordering systems.

13
14 **Q. HOW DO BELLSOUTH REPRESENTATIVES OBTAIN ACCESS TO**
15 **USOC AND FID INFORMATION?**

16 A. MCImetro suspects that BellSouth customer service representatives have electronic
17 access to computer databases with USOC (and perhaps FID) information. In any
18 event, ALECs are experiencing much higher rejection rates than are BellSouth's
19 retail units and USOCs are the biggest culprit. Whether BellSouth's advantage
20 derives from having substantial USOC information in its computer databases or a
21 workforce that has been trained over the years to master the idiosyncrasies of
22 USOCs and FIDs, the playing field currently is not level.

23
24 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THE USOC ISSUE WITH**
25 **BELLSOUTH?**

1 A. Yes. In its December 24 letter, MCImetro requested that BellSouth provide via
2 electronic transmission a description or definition of each of its USOCs along with
3 other pertinent information. In its February 11 letter, BellSouth did not agree to
4 take this action.

5

6 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
7 **FIVE?**

8 A. If ALECs are to overcome the obstacles created by BellSouth's ordering system,
9 they must obtain USOC and FID information in a format that they can incorporate
10 into their systems and use efficiently. Accordingly, MCImetro is requesting that
11 BellSouth should be ordered to provide MCImetro via fixed format NDM a
12 description or definition of each of its USOCs, including the required field identifiers
13 and their descriptions and the states in which the USOCs are valid. BellSouth
14 should be required to update this information on a biweekly basis and should give
15 notice of the implementation or deactivation of a USOC forty-five days in advance.

16

17 ***COUNT SIX: FAILURE TO PROVIDE CUSOMER SERVICE RECORD***
18 ***INFORMATION***

19 **Q. IS BELLSOUTH PROVIDING NONDISCRIMINATORY ACCESS TO CSR**
20 **DATA?**

21 A. No. BellSouth has made a decision not to include all of the information in its CSRs
22 in LENS. As a result of BellSouth's business decision, LENS does not provide
23 access to CSRs at parity. LENS only provides ALECs access to a subset of the
24 information available to a BellSouth customer service representative who accesses a
25 CSR. For example, BellSouth initially provided pricing information on CSRs, but

1 now strips that information off CSRs provided to ALECs. BellSouth categorizes
2 CSR information as necessary (which is provided to ALECs) and unnecessary or
3 proprietary (which is not). BellSouth claims that ALECs do not need the additional
4 information. But ALECs may be able to use this information to design new services
5 BellSouth has not even thought of. It is not for BellSouth to decide that ALECs do
6 not need information to which BellSouth itself has access. One of the major
7 potential benefits of competition is the possibility of innovation in services offered.

8
9 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THIS ISSUE WITH**
10 **BELLSOUTH?**

11 A. Yes. In its December 24 letter, MCI metro requested BellSouth to provide
12 additional CSR data that BellSouth has been withholding. In its February 11 letter,
13 BellSouth refused to provide any additional information.

14
15 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
16 **SIX?**

17 A. MCI metro has requested that BellSouth be required to provide MCI metro with
18 access to all CSR data, except such data as BellSouth can prove it is not authorized
19 to release by its customers or under applicable law, rule or regulation.

20
21 **ORDERING AND PROVISIONING CLAIMS**

22 ***COUNT SEVEN: FAILURE TO PROVIDE PARITY IN SERVICE JEOPARDY***
23 ***NOTIFICATION***

24 **Q. IN THE CONTEXT OF COUNT 7 OF THE COMPLAINT, WHAT DOES**
25 **THE TERM JEOPARDY MEAN?**

1 A. A jeopardy situation occurs when a customer's order cannot be completed on the
2 due date. BellSouth divides jeopardy notifications into "missed appointment"
3 jeopardies and "service" or "facilities" jeopardies. Missed appointment jeopardies
4 involve situations in which, for example, the customer is not home when the
5 technician comes out to install service. Service jeopardies involve situations in
6 which, for example, fulfilling the order will take longer than anticipated because
7 BellSouth finds out that it lacks outside plant and must install such plant before
8 completing the order.

9
10 **Q. WHY DOES MCIMETRO NEED TO RECEIVE NOTICE OF SERVICE**
11 **JEOPARDIES?**

12 A. It is critical for MCImetro to receive notice of service jeopardies so it can notify its
13 customers immediately and track the status of its orders accurately.

14
15 **Q. HOW HAS BELLSOUTH AGREED TO NOTIFY MCIMETRO OF MISSED**
16 **APPOINTMENTS?**

17 A. BellSouth has agreed to provide missed assignment jeopardies via EDI, although I
18 should note that to date that notification process is untested by MCImetro.

19
20 **Q. HOW DOES BELLSOUTH'S NOTIFICATION TO MCIMETRO OF**
21 **SERVICE JEOPARDIES COMPARE TO THE NOTICE BELLSOUTH**
22 **PROVIDES TO ITSELF?**

23 A. BellSouth provides notice of service jeopardies to its customer service
24 representatives who call BellSouth's customers, and to other representatives who
25 call MCImetro. ALECs thus cannot relay jeopardy notifications to their customers

1 as rapidly and efficiently as BellSouth. The relevant comparison is what BellSouth
2 provides to ALECS versus what it provides to itself, not versus what BellSouth
3 provides to its customers. The disparity in notification is made worse because
4 MCImetro is unable to track orders once they have been submitted. BellSouth's
5 policy is to continue working on an order as long as possible and not to give notice
6 of a problem to an ALEC until it becomes clear that the order cannot be installed on
7 time. Such notice usually is given on the day the order is scheduled to be installed.

8
9 **Q. WHAT IS THE IMPACT OF MCIMETRO NOT RECEIVING TIMELY**
10 **NOTIFICATION OF SERVICE JEOPARDIES?**

11 A. The manual process for informing MCImetro of service-based jeopardies will
12 negatively impact MCImetro, which may not receive notice of the changed due date
13 in sufficient time to notify its customers. When the customers call MCImetro to find
14 out why their service has not been turned up MCImetro will not know the reason.
15 Not only will this anger the customer, but MCImetro will have to waste time and
16 money attempting to track down the status of the order.

17
18 **Q. HAS MCIMETRO REQUESTED ELECTRONIC NOTIFICATION OF**
19 **SERVICE JEOPARDIES?**

20 A. Yes. In an E-Mail dated August 18, BellSouth stated that it had the capability to
21 support jeopardy notifications via EDI. I responded by E-Mail dated August 21,
22 1997, requesting that BellSouth provide specifications and sample transactions for
23 mechanized jeopardy notices. Copies of these E-Mails are attached as Exhibits 6
24 (BG-13) and 6 (BG-14), respectively. Follow-up requests were made by letters
25 dated August 27 and September 18, 1997, copies of which are attached as Exhibits

1 6 (BG-15) and 6 (BG-8), respectively. BellSouth refused to provide the
2 requested specifications and sample transactions, and informed MCImetro that it
3 would not provide notification of service jeopardies via EDI after all. BellSouth
4 stated this position formally in a letter dated October 10, 1997, a copy of which is
5 attached as Exhibit 6 (BG-9).

6

7 **Q. DOES THE LACK OF A NATIONAL STANDARD FOR JEOPARDIES**
8 **EXCUSE BELLSOUTH'S REFUSAL TO PROVIDE NOTIFICATION FOR**
9 **SERVICE JEOPARDIES VIA EDI?**

10 A. No. BellSouth provides notification for missed appointment jeopardies via EDI
11 even though no national standard exists, and should do the same with respect to
12 service jeopardies.

13

14 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
15 **SEVEN?**

16 A. MCI is requesting that BellSouth be required to provide commercially functional
17 EDI support for service jeopardy notifications.

18

19 ***COUNT EIGHT: FAILURE TO PROVIDE FOCs IN COMPLIANCE WITH THE***
20 ***INTERCONNECTION AGREEMENT***

21 **Q. WHAT IS AN FOC?**

22 A. FOC stands for "firm order confirmation." After an MCImetro order has been
23 processed, BellSouth sends MCImetro an FOC, which verifies that the order has
24 been accepted and includes the date on which service installation is to occur.

25

1 **Q. BASED ON MCIMETRO'S RECORDS, HOW LONG IS IT TAKING**
2 **BELLSOUTH TO SEND FOCs TO MCIMETRO?**

3 A. As noted in a letter from MCI to BellSouth dated January 28, 1998, MCI metro has
4 experienced substantial delays in receiving FOCs from BellSouth for orders for of
5 off-net T1s (lines used to connect the customer's premises to BellSouth's network)
6 for MCI metro local customers. A copy of that letter is attached as Exhibit 6
7 (BG-16). As noted in the letter, data collected by MCI over the seven month period
8 ending December 1997 reveals that the average time for BellSouth to return FOCs
9 on orders for off-net for MCI metro local customers was more than seven days. This
10 data was collected for four states, including Florida.

11

12 **Q. SINCE THE JANUARY 28, 1998 LETTER WAS WRITTEN, HAS**
13 **MCIMETRO COLLECTED ADDITIONAL DATA?**

14 A. Yes, based on a sample of 356 ASRs submitted during the first quarter of this year,
15 the average time to receive an FOC was 5.48 days. That record of performance
16 remains highly unsatisfactory.

17

18 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
19 **EIGHT?**

20 A. MCI metro is requesting that BellSouth be required to modify its OSS to provide
21 FOCs within the timeframes specified in the Agreement.

22

23 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

24 A. Yes, at this time.

25

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **REBUTTAL TESTIMONY OF BRYAN GREEN**

3 **ON BEHALF OF**

4 **MCIMETRO ACCESS TRANSMISSION SERVICES, INC**

5 **DOCKET NO. 980281-TP**

6 **JUNE 29, 1998**

7

8 **Q. PLEASE STATE YOUR NAME, ADDRESS AND TITLE.**

9 A. My name is Bryan Green. My business address is 2520 Northwinds Parkway,
10 Alpharetta, Georgia 30004. I am employed by MCI Telecommunications
11 Corporation (MCI) in the Southern Financial Operations group as a Senior
12 Manager.

13

14 **Q. ARE YOU THE SAME BRYAN GREEN THAT FILED DIRECT**
15 **TESTIMONY IN THIS DOCKET ON MAY 4, 1998?**

16 A. Yes.

17

18 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

19 A. The purpose of my rebuttal testimony is to respond to some of the statements
20 made by BellSouth witnesses Stacy and Milner in their direct testimony filed on
21 June 1, 1998. I will not attempt to respond to every allegation made by those
22 witnesses because much of their testimony has been addressed adequately in my
23 direct testimony.

GENERAL CLAIM

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COUNT ONE: FAILURE TO PROVIDE OSS INFORMATION

Q. AT PAGES 3 AND 4 OF HIS TESTIMONY, MR. STACY DESCRIBES MATERIALS AND TRAINING THAT HAVE BEEN MADE AVAILABLE CONCERNING THE OSS BELLSOUTH PROVIDES TO ALECS. DOES THIS INFORMATION AND TRAINING ADDRESS MCIMETRO'S CONCERNS?

A. No. MCI metro's claim is based on BellSouth's failure to provide information about its own OSS, not information about the OSS BellSouth provides to MCI metro. MCI metro brought its claim because it discovered during OSS presentations at Section 271 hearings in Florida and elsewhere that despite BellSouth's assertions that it was providing OSS parity, BellSouth's own OSS capabilities far exceeded the capabilities that BellSouth afforded to ALECs. BellSouth has rejected MCI metro's efforts to obtain detailed information about BellSouth's systems and databases that would permit MCI metro to make comparisons in a systematic way.

Q. HOW DO YOU RESPOND TO MR. STACY'S CONTENTION AT PAGE 5 OF HIS TESTIMONY THAT MCI HAS BEEN GIVEN OPPORTUNITIES TO LEARN ABOUT BELLSOUTH'S OSS?

A. MCI has had the opportunity to cross-examine BellSouth about its OSS at 271 hearings and related workshops, but such examination as a practical matter has been limited. Moreover, when (as in the recent Tennessee 271 proceeding),

1 MCI has requested the information that it seeks in Count One of this case,
2 BellSouth has objected and refused to produce the information. To say the
3 least, it is suspicious that BellSouth is willing to produce certain information
4 about its OSS, but is not willing to produce even a simple list of the OSS
5 systems and databases that it uses. BellSouth should not be allowed to produce
6 information that it deems favorable and conceal information that it evidently
7 considers to be damaging.

8

9

CLAIMS RELATING TO PRE-ORDERING

10 **Q. MR. STACY DESCRIBES CERTAIN CAPABILITIES OF A PRE-**
11 **ORDERING INTERFACE CALLED EC-LITE. IS EC-LITE**
12 **AVAILABLE TO MCIMETRO AS A PRACTICAL MATTER?**

13 **A.** No. EC-LITE was developed by BellSouth specifically for AT&T. I know of
14 no other ALEC that is planning to build to the EC-LITE interface, which is not
15 surprising because EC-LITE has been rejected as an industry standard by the
16 Electronic Communication Interface Committee (ECIC). Implementing EC-
17 LITE would take several months and cost millions of dollars. Such an
18 investment would be unwise and impractical because EC-LITE is and is very
19 likely to remain a nonstandard interface.

20

21 **Q. PLEASE DESCRIBE YOUR EFFORTS TO OBTAIN LENS**
22 **TECHNICAL SPECIFICATIONS FROM BELLSOUTH.**

1 A. Attempting to obtain up-to-date technical specifications from BellSouth has
2 been a frustrating experience. I initially requested LENS technical
3 specifications by letter to BellSouth dated May 16, 1997, a copy of which is
4 attached to my testimony as Exhibit 7 (BG-17). I repeated my request by
5 letters dated June 4 and June 26, 1997, copies of which are attached as Exhibits
6 7 (BG-18) and 7 (BG-19), respectively. By letter dated July 8, 1997,
7 BellSouth enclosed out-of-date technical specifications that were of limited use
8 to MCImetro. A copy of this letter is attached as Exhibit 7 (BG-20).
9
10 BellSouth subsequently sent technical specifications dated September 5, 1997
11 that supported an earlier release of LENS. An MCImetro letter dated
12 September 5, 1997 noting this fact and requesting the latest specifications is
13 attached as Exhibit 7 (BG-21). By E-Mail dated November 7, 1997,
14 BellSouth sent what appeared to be another set of LENS specifications; I
15 responded by E-Mail dated November 13, 1997, noting that these specifications
16 were identical to the specifications that were sent on September 5. A copy of
17 this exchange of E-Mails is attached as Exhibit 7 (BG-22). In the November
18 13, 1997 letter from Mark Feidler (attached to my direct testimony as Exhibit
19 7 (BG-10)), he states that BellSouth provided CGI specifications on
20 November 7, 1997, but fails to acknowledge that these specifications were
21 merely a duplicate of the out-of-date specifications from September 5, 1997.
22

1 BellSouth sent another set of specifications by E-mail dated December 15,
2 1997. (See Exhibit ___ (WNS-15).) As I explained in my direct testimony,
3 these specifications were deficient because they lacked a data dictionary and a
4 record layout for the Customer Service Record (CSR).

5

6 **Q. HAVE MCIMETRO AND BELLSOUTH BEEN ABLE TO RESOLVE**
7 **MCIMETRO'S CONCERNS RELATING TO THE DATA**
8 **DICTIONARY AND CSR RECORD LAYOUT?**

9 A. No. As reflected in the correspondence attached to Mr. Stacy's testimony as
10 Exhibits ___ (WNS-17) to ___ (WNS-22), BellSouth has not been willing to
11 provide a data dictionary concerning CSRs or to provide a CSR record layout.
12 As a result, MCI metro's ability to use the CGI-LENS interface as an interim
13 means of obtaining CSR data has been delayed and impaired.

14

15 **Q. MR. STACY CLAIMS AT PAGES 20-21 OF HIS TESTIMONY THAT**
16 **BELLSOUTH HAS SHOWN THAT IT IS POSSIBLE TO USE THE CGI**
17 **SPECIFICATION TO BUILD AN INTEGRATABLE INTERFACE.**
18 **PLEASE COMMENT.**

19 A. MCI learned about the prototype project commissioned by BellSouth when
20 BellSouth testified about the project at the 271 hearing in Tennessee on May 7,
21 1998. During cross-examination the following day, a number of significant
22 points about the project were brought out. First, BellSouth's prototype is just
23 that, a prototype that was developed for BellSouth to demonstrate that a CGI

1 interface could be developed using the CGI specifications. The prototype is not
2 intended for commercial use. Second, CGI-LENS offers the same pre-ordering
3 functionality as LENS and thus suffers from the same limitations as LENS.
4 (For example, as in LENS, an ALEC only can reserve six telephone numbers at
5 a time.) Third, the prototype was developed for new residential service orders
6 only. CSR information is not required for such orders, and thus the Albion
7 report attached to Mr. Stacy's testimony as Exhibit ___ (WNS-23) reflects that
8 its software only permits ALECs to view CSR information and apparently not
9 to use it in ordering. BellSouth thus still has not shown that its specifications
10 are fully sufficient to obtain and process CSR information -- the one
11 functionality that MCImetro has sought from CGI-LENS (on an interim basis).
12 A fourth point also should be mentioned, which is that on the final page of the
13 Albion report, five BellSouth contact numbers are listed. Although BellSouth
14 has not provided any other information concerning the assistance that BellSouth
15 provided to Albion during the project, I would not be surprised if Albion
16 received more cooperation from BellSouth on its project than MCImetro did in
17 attempting to obtain adequate CGI specifications.

18

19 **Q. DOES MCIMETRO INTEND TO USE CGI-LENS IN THE INTERIM**
20 **FOR PURPOSES OTHER THAN OBTAINING AND PROCESSING**
21 **CSR INFORMATION?**

22 **A.** No, it would be impractical to do so. As noted in the Albion report, more than
23 1000 man-hours and \$120,000 were required just to prepare a prototype

1 applicable only to new residential service orders. This project is certainly a
2 tribute to BellSouth's tremendous financial resources, but it also demonstrates
3 the great cost involved in attempting to develop a full-blown commercial
4 application of CGI-LENS.

5

6 **Q. WHAT PRE-ORDERING INTERFACE DOES MCIMETRO INTEND**
7 **TO USE?**

8 A. MCImetro intends to use an interface based on the EDI TCP/IP/SSL3 protocol.
9 As I noted in my direct testimony, MCImetro has been requesting BellSouth to
10 work with MCImetro to develop such an interface for about a year now, but
11 until just recently BellSouth has refused to do so. But this month EDI
12 TCP/IP/SSL3 was approved as an industry guideline and MCImetro
13 understands that BellSouth now will begin to implement an interface based on
14 that protocol with MCImetro. Because work will now begin on an interface
15 based on industry standards, it would make even less sense for MCImetro to
16 invest further resources in the CGI-LENS interface.

17

18 **Q. WOULD A CGI-LENS PRE-ORDERING INTERFACE PROVIDE**
19 **PARITY WITH BELLSOUTH'S OSS?**

20 A. Absolutely not, for the reasons I discussed at page 10 of my direct testimony.
21 Further, as the Georgia Public Service Commission recently concluded,
22 "BellSouth's LENS-CGI presentation requires the use of an underlying Hyper
23 Text markup Language ("HTML") presentation as part of the data delivery

1 mechanism, and this forces CLECs into a slower, less efficient integration than
2 is available to BellSouth for its comparable retail operations.” In re
3 Investigation into Development of Electronic Interfaces for BellSouth’s
4 Operations Support Systems, Docket No. 8354-U, p. 9.

5

6 ***COUNT TWO: FAILURE TO PROVIDE A DOWNLOAD OF THE SAG DATA***

7 **Q. AT PAGE 12 OF HIS TESTIMONY, MR. STACY REFERS TO COST**
8 **ESTIMATES PROVIDED TO MCIMETRO BY BELLSOUTH. DID**
9 **MCIMETRO REQUEST THESE COST ESTIMATES?**

10 **A.** No. It has always been MCI metro’s position that the Interconnection
11 Agreement requires BellSouth to provide a download of the Regional Street
12 Address Guide (RSAG) at no additional cost. MCI metro has never submitted a
13 bona fide request for such a download. I did receive an E-Mail, a copy of
14 which appears to be attached to Mr. Stacy’s testimony as Exhibit ___ (WNS-8),
15 in which BellSouth suggested that a “Business Opportunity Request” be
16 submitted internally by the BellSouth account team. After receiving the E-Mail,
17 I informed BellSouth that I did not object to BellSouth going through its
18 internal procedures for processing MCI metro’s request for a download of the
19 SAG data. But I did not state or imply that MCI metro had changed its position
20 that no additional cost should be required.

21

22 **Q. MR. STACY STATES AT PAGE 13 OF HIS TESTIMONY THAT**
23 **“BASED ON THE VOLUME OF DATA INVOLVED, IT IS**

1 **INCONCEIVABLE THAT BELLSOUTH WOULD EVER HAVE**
2 **AGREED TO PROVIDE MCIMETRO OR ANY OTHER ALEC A**
3 **DOWNLOAD OF RSAG DATA.” PLEASE COMMENT.**

4 A. In the first place, the language of the contract is clear, as described in the
5 testimony of Ronald Martinez. Second, my understanding is that AT&T’s
6 interconnection agreements require BellSouth to provide a “download” of the
7 RSAG, so BellSouth was willing to agree to such a contractual term (as it did
8 with MCImetro using other language) and did not regard such a provision as
9 “inconceivable.” Third, based on BellSouth testimony I saw in Georgia, it is my
10 understanding that BellSouth downloaded the RSAG to a mainframe computer
11 as part of volume testing it has conducted. In short, BellSouth’s “volume”
12 argument fails to hold water.

13

14 ***COUNT THREE: FAILURE TO PROVIDE PARITY IN DUE DATE***

15 ***INTERVALS***

16 **Q. DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY**
17 **WITH RESPECT TO DUE DATES?**

18 A. No. BellSouth does not dispute that it has no method of calculating due dates
19 for unbundled network element (UNE) orders. Further, Mr. Stacy
20 acknowledges that in the inquiry mode of LENS, the customer service
21 representative must perform a manual due date calculation. (Stacy Dir. Test.,
22 p. 17.) This requirement is discriminatory. I note that the same problem exists
23 in CGI-LENS, as reflected in the Albion report attached to Mr. Stacy’s

1 testimony. (See Exhibit ___, WNS-23, p.8.) Mr. Stacy's suggestion that
2 ALECs do their own programming to calculate due dates based on information
3 provided in the inquiry mode of LENS is unacceptable because, even assuming
4 such programming could be successfully undertaken, it is unreasonable to
5 expect ALECs to make such an investment in a proprietary and inadequate pre-
6 ordering system. Further, Mr. Stacy ignores the Commission's directive in the
7 271 proceedings in Docket No. 960786-TL (271 Order) that BellSouth fix this
8 problem. See 271 Order, pp. 82-83, 157-58.

9
10 ***COUNT FOUR: FAILURE TO PROVIDE PARITY IN ACCESS TO***
11 ***TELEPHONE NUMBERS AND TELEPHONE NUMBER INFORMATION***

12 **Q. DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY**
13 **WITH RESPECT TO TELEPHONE NUMBER RESERVATION?**

14 **A.** No. At page 24 of his testimony, Mr. Stacy acknowledges that BellSouth's
15 customer service representatives using RNS or DOE may reserve up to twenty-
16 five telephone numbers, while ALEC customer service representatives using
17 LENS only may reserve six. This same limitation exists in LENS when
18 enhanced by CGI. ALECs' ability to reserve successive batches of six
19 telephone numbers does not remedy the disparity -- an ALEC customer service
20 representative would have to have to go back to the number reservation screen
21 five times to order twenty-five numbers and the delay involved would be
22 compounded if the ALEC wanted the numbers in sequence.

23

1 **Q. PLEASE RESPOND TO MR. STACY'S TESTIMONY AT PAGE 26**
2 **CONCERNING THE ABILITY TO VIEW AVAILABLE NXX CODES.**

3 A. Mr. Stacy appears to acknowledge that, as MCImetro has alleged, BellSouth
4 customer service representatives have access to available NXX codes through
5 BellSouth's OSS, while ALECs do not have such access through LENS. Mr.
6 Stacy provides no justification for this disparity. Mr. Stacy's statement that
7 ALECs should incorporate the LERG into their own systems ignores the fact
8 that the LERG is massive and incorporating it into ALEC's OSS systems for
9 on-line access would not be a practical undertaking. In the final analysis,
10 BellSouth simply refuses to heed the Commission's 271 Order in which it
11 directed BellSouth to correct deficiencies such as this one. See 271 Order, pp.
12 82-83, 157-58.

13
14 **Q. PLEASE RESPOND TO MR. STACY'S TESTIMONY AT PAGES 26**
15 **AND 27 CONCERNING PRE-SELECTED TELEPHONE NUMBERS.**

16 A. Again, BellSouth does not dispute that its customer service representatives
17 using RNS have access to pre-selected telephone numbers, whereas ALEC
18 customer service representatives using LENS do not. The Commission in its
19 271 Order directed BellSouth to correct this deficiency. See 271 Order, pp. 82-
20 83, 157-58. BellSouth's only response is that ALECs could develop a similar
21 functionality if they chose. (Stacy Dir. Test., pp. 26-27.) This response does
22 not comply with the Commission's directive.

23

1 **COUNT FIVE: FAILURE TO PROVIDE PARITY IN ACCESS TO USOC**
2 **INFORMATION**

3 **Q. HAVE ANY DEVELOPMENTS TAKEN PLACE CONCERNING**
4 **USOCS SINCE YOU FILED YOUR DIRECT TESTIMONY?**

5 A. Yes. Since my direct testimony was filed, BellSouth has provided USOCs in a
6 spaced value format that enables MCImetro to download USOCs into a
7 database, so that issue appears to be resolved. The remaining issue is the
8 problem of having to reference the LEO Guide or the SOER edits to obtain
9 field identifiers and to determine the states in which a USOC is valid. This
10 problem still has not been addressed. In particular, MCImetro still requires a
11 FID file with descriptions that would enable MCImetro's CSR server project to
12 present CSRs in English without unnecessary guesswork.

13

14 **COUNT SIX: FAILURE TO PROVIDE CUSOMER SERVICE RECORD**
15 **INFORMATION**

16 **Q. DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY**
17 **WITH RESPECT TO THE PROVISION OF CSR DATA?**

18 A. No. At pages 31 and 32 of his testimony, Mr. Stacy acknowledges that
19 BellSouth provides CSR data based on its determination of what ALECs need
20 to provision telephone service and limits the number of pages that ALECs may
21 obtain electronically through LENS. Further, at pages 33-35, Mr. Stacy
22 acknowledges that BellSouth does not currently provide pricing information or
23 a local service itemization.

1

2 **Q. AT PAGE 32 OF HIS TESTIMONY, MR. STACY STATES THAT**
3 **BELLSOUTH PROHIBITS ALECS FROM ACCESS TO CSR**
4 **INFORMATION WHEN CUSTOMERS REQUEST THAT THEIR**
5 **ACCOUNT INFORMATION BE RESTRICTED. PLEASE COMMENT.**

6 A. BellSouth's practice of prohibiting ALECs from access to "restricted" CSRs,
7 even after MCImetro has obtained the customer's express permission to obtain
8 access, is improper and discriminatory. BellSouth refuses to permit access to
9 such CSRs until after it has spoken to the customer, even if MCImetro faxes a
10 copy of the letter of authorization. BellSouth has taken seven to thirty days to
11 lift the restriction on CSR data after MCImetro has made an authorized request
12 for it.

13

14 **Q. PLEASE RESPOND TO MR. STACY'S ARGUMENT AT PAGES 33-34**
15 **OF HIS TESTIMONY THAT BELLSOUTH SHOULD BE ABLE TO**
16 **STRIP OFF PRICING INFORMATION FROM THE CSRS IT**
17 **PROVIDES TO ALECS.**

18 A. BellSouth should not be permitted to strip off pricing information before
19 providing CSRs to ALECs. As Mr. Stacy acknowledges, this pricing
20 information is not proprietary, and indeed is based on tariffed rates that are
21 public and nonproprietary. The only reason for excluding this information is to
22 have ALECs derive the same information from other sources, making their pre-
23 ordering processes more expensive and time-consuming. ALECs will benefit

1 from having this information readily accessible and thus will be better able to
2 compete with BellSouth. That is why BellSouth seeks to exclude this
3 information and also why BellSouth should be prevented from doing so. I
4 further note that in its OSS Order at pages 10-11, the Georgia Public Service
5 Commission rejected similar arguments by BellSouth and required BellSouth to
6 include pricing information in the CSRs provided to ALECs.

7

8 **ORDERING AND PROVISIONING CLAIMS**

9 ***COUNT SEVEN: FAILURE TO PROVIDE PARITY IN SERVICE JEOPARDY***

10 ***NOTIFICATION***

11 **Q. DOES BELLSOUTH DEMONSTRATE THAT IT PROVIDES PARITY**
12 **WITH RESPECT TO SERVICE JEOPARDY NOTIFICATION?**

13 **A.** No. As Mr. Stacy acknowledges, when BellSouth realizes that it will not be
14 able to complete an order for workload reasons on the day of the appointment,
15 its work management center calls its customers. For MCI metro customers,
16 BellSouth calls MCI metro, which in turn calls its customers. (Stacy Dir. Test.,
17 pp. 37-39.) The notification process for MCI metro thus involves an additional
18 manual step. Otherwise, in the interim MCI metro has agreed to receive service
19 jeopardy notifications via E-Mail, but this interim process is inferior to what
20 BellSouth provides itself. BellSouth should be required to provide service
21 jeopardies via EDI as MCI metro has requested.

22

1 **Q. DO YOU AGREE THAT MCIMETRO SHOULD BE REQUIRED TO**
2 **SUBMIT A BFR TO OBTAIN SERVICE JEOPARDY NOTIFICATIONS**
3 **VIA EDI?**

4 **A.** No. As described in the direct testimony of Ronald Martinez, the
5 Interconnection Agreement requires BellSouth to provide service jeopardy
6 notification at parity with what it provides to itself. A BFR should not be
7 required for BellSouth to meet this obligation.

8

9 **Q. HOW DO YOU RESPOND TO MR. STACY'S ASSERTION AT PAGE**
10 **38 OF HIS TESTIMONY THAT MCIMETRO HAS NOT YET**
11 **IMPLEMENTED EDI?**

12 **A.** MCImetro is currently in the process of testing EDI in preparation for
13 implementation. Obviously, it will take some time to incorporate a service
14 jeopardy notification function into the EDI interface, so now is the time to do
15 so. Waiting until after the EDI interface has been implemented only will result
16 in unnecessary delay.

17

18 ***COUNT EIGHT: FAILURE TO PROVIDE FOCs IN COMPLIANCE WITH THE***
19 ***INTERCONNECTION AGREEMENT***

1 Q. PLEASE RESPOND TO MR. MILNER'S CONTENTION, AT PAGE 4
2 OF HIS TESTIMONY, THAT MCIMETRO COULD HAVE ORDERED
3 A SERVICE COMPARABLE TO OFF-NET T1S UNDER THE
4 INTERCONNECTION AGREEMENT.

5 A. MCImetro should have been able to order a comparable service and indeed
6 attempted to do so. As noted in a letter from Walter Schmidt to Pam Lee dated
7 June 1, 1998, on November 10, 1997, MCImetro requested BellSouth to
8 provide off-net T1 combinations under the Interconnection Agreement. The
9 letter further notes that BellSouth refused to provide these combinations. A
10 copy of the letter is attached to my testimony as Exhibit 7 (BG-23). Thus,
11 BellSouth is attempting to rely on its own breach of contract to circumvent the
12 performance standards of the Interconnection Agreement.

13
14 Q. IS THERE ANY OTHER REASON THAT BELLSOUTH IS REQUIRED
15 TO COMPLY WITH THE PERFORMANCE STANDARDS OF THE
16 INTERCONNECTION AGREEMENT?

17 A. Yes. For the reasons described in the direct testimony of Ronald Martinez,
18 BellSouth should be required to meet the performance standards of the
19 Interconnection Agreement for access service requests submitted for the
20 purpose of providing local service.

21
22 Q. IF THE INTERCONNECTION AGREEMENT WERE FOUND NOT TO
23 APPLY, TO WHAT STANDARD SHOULD BELLSOUTH BE HELD?

1 A. As noted in Andri Weathersby's letter to Sharon Daniels dated November 5,
2 1997, MCImetro understood from its discussions with BellSouth that BellSouth
3 would provide FOCs for access circuits within forty-eight hours (which is the
4 standard in the industry). BellSouth responded by letter dated December 15,
5 1997 in which it did not dispute this understanding. A copy of the November 5
6 and December 15 letters are attached as Exhibits 7 (BG-24) and 7 (BG-
7 25), respectively. So even if the standard for access service requests were
8 applied, BellSouth's FOC performance would fall far short of what is required.

9

10 **Q. DOES BELLSOUTH'S FOC PERFORMANCE MEET THE**
11 **REQUIREMENTS OF NONDISCRIMINATORY ACCESS TO OSS**
12 **AND PROVIDE MCIMETRO A MEANINGFUL OPPORTUNITY TO**
13 **COMPETE UNDER THE TELECOMMUNICATIONS ACT OF 1996?**

14 A. No.

15

16 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

17 A. Yes, it does at this time.

18

19

20

21

22

23

1 Q (By Mr. Melson) Mr. Green, would you
2 please summarize your testimony for the Commission?

3 A Yes, I will. Good afternoon, Commissioners.

4 My testimony addresses Issues 1 through 8
5 and discusses BellSouth's failure to live up to its
6 obligation with its Interconnection Agreement with
7 MCImetro.

8 Count 1 involved MCImetro's need to have
9 information about the various operational support
10 systems, or OSSs, and databases that BellSouth uses to
11 provide service to its retail customers.

12 MCI knows what OSS systems and functions
13 BellSouth provides to us. For example, BellSouth
14 provides LENS for preordering and EDI for ordering.
15 We also know that BellSouth's customer service
16 representatives use RNS and DOE to perform similar
17 functions. And we've seen limited demonstrations
18 which show those systems are far superior to what is
19 provided to MCI. What we don't have is an
20 understanding of the full capabilities of BellSouth's
21 own systems. Without that information, there will be
22 no way for us to tell when BellSouth is living up to
23 its obligation to provide OSS functionality with its
24 own systems at parity.

25 The next issue, Count 2, deals with the

1 regional street guide, or RSAG, which is the database
2 that BellSouth uses to validate customer addresses.

3 MCI has been asking for a download of this
4 database so that we can integrate the address
5 validation function into our own operational support
6 systems without the need to rely on LENS.

7 BellSouth has refused to provide this
8 download for a variety of reasons that have change
9 over time. Some comments have been "It's too big for
10 us to do. It contains proprietary information," down
11 to "It's not required by the Interconnection
12 Agreement."

13 We're asking that you cut through all of
14 these excuses and require BellSouth to download this
15 information to MCImetro as required by the
16 Interconnection Agreement.

17 Count 3 deals with the lack of parity and
18 due date calculation. An ALEC that uses EDI for
19 ordering must obtain due date information through the
20 inquire mode of LENS. This Commission determined in
21 the 271 docket that BellSouth was not providing due
22 date calculation through LENS at parity with what it
23 enjoys itself at parity. BellSouth has done nothing
24 to upgrade this function in LENS since that time. So
25 it is in breach of the parity provisions of our

1 Interconnection Agreement.

2 The next issue deals with parity and access
3 to telephone numbers and telephone number information.

4 There are two points here.

5 First, BellSouth can reserve up to 25
6 numbers at a time, while MCImetro is limited to
7 reserves six numbers at a time.

8 Second, BellSouth's RNS system displays all
9 of the NXX codes that are available to serve a
10 particular customer, while LENS does not. These are
11 not at parity.

12 Count 5 deals with MCI's access to
13 information necessary to place valid orders for
14 service. After months of resisting, BellSouth has
15 recently provided USOC, or universal service code,
16 information to MCImetro in a usable format. However,
17 BellSouth still has not provided information on FIDs
18 or field identifiers, or the states in which
19 particular USOCs are valid in a usable format. This
20 places an MCI customer service representative at a
21 disadvantage to BellSouth's customer service
22 representatives in trying to place a correct order for
23 the exact same service.

24 With respect to Issue 6, information in the
25 customer service record, BellSouth has unilaterally

1 decided to stripe off certain information from the CSR
2 before providing the information to MCI and other
3 ALECs. Once a customer has given MCI permission to
4 access his CSR, or customer service record, MCI is
5 entitled to have access to the full range of
6 information contained in that record. In addition,
7 the LENS interface that MCI uses to access the
8 customer service record does not enable MCI to
9 integrate that information from the CSR into the
10 ordering process. The specifications that BellSouth
11 has provided to MCI for retrieving information from
12 the CSR are insufficient to enable MCI to parse this
13 information into a usable format.

14 Count 7 deals with the way BellSouth
15 notifies MCI when there's a service jeopardy. Today
16 that's done by telephone or fax. BellSouth should be
17 ordered to provide this information electronically via
18 the EDI ordering interface, so that MCI will be able
19 to notify its customers in a timely manner when an
20 installation date will be missed.

21 The last issue, Count 8, involves firm order
22 confirmations, or FOC. BellSouth is consistently
23 failing to provide FOC within the time limits
24 established in the Interconnection Agreement.
25 BellSouth should be ordered to live up to those agreed

1 upon performance measurements.

2 And that concludes my summary.

3 **MR. MELSON:** The witness is tendered for
4 cross.

5 **COMMISSIONER CLARK:** Madam Chair, before we
6 go to cross, I'd like a clarification on what MCI is
7 asking for.

8 On Page 12 of your testimony you've
9 indicated that orders get rejected and the predominant
10 reason is not having the right street address. Right
11 address. And then you make the comment on Lines 14
12 through 15 that "BellSouth has said that an address
13 must be correct before it can be entered into the E911
14 database. Orders rejected because of an invalid
15 address increase the cost of doing business and
16 potentially delay a customer's service." What is your
17 remedy?

18 **WITNESS GREEN:** Our remedy relative to this
19 particular count is that BellSouth provide us with the
20 RSAG database for us to incorporate into our front end
21 systems.

22 **COMMISSIONER CLARK:** You're not suggesting
23 you need not give them the precise address? I mean,
24 the example you gave is if you enter 19th Street,
25 instead "19th" and then the abbreviation "street," it

1 will kick it back, right?

2 **WITNESS GREEN:** That's correct.

3 **COMMISSIONER CLARK:** You're not suggesting
4 that that kind of rejection be eliminated, are you?

5 **WITNESS GREEN:** No. I'm not suggesting
6 that. What I'm suggesting is that without having the
7 actual database available to us that BellSouth uses to
8 validate an address, we would run into a situation
9 where if we did not have the exact attorney that was
10 in that database, that order would be rejected because
11 of invalid address.

12 **COMMISSIONER CLARK:** Right. But you would
13 agree it ought to be rejected because it is important
14 that we make sure that E911 database is correct.

15 **WITNESS GREEN:** Yes.

16 **COMMISSIONER CLARK:** Let me ask you one
17 other thing. I believe you stated that you're not at
18 parity with the due date because this Commission has
19 already decided in the 271 docket that what they were
20 providing was not adequate?

21 **WITNESS GREEN:** I'm sorry, could you ask
22 that question again?

23 **COMMISSIONER CLARK:** You are not at parity
24 for the due date.

25 **WITNESS GREEN:** That's correct.

1 **COMMISSIONER CLARK:** And the basis on which
2 you argue that you're not at parity is that our
3 decision in the 271 docket -- where we indicated they
4 had not met the 14-point checklist; said that their
5 due date -- method of providing you with a due date
6 was not sufficient; is that correct?

7 **WITNESS GREEN:** That's not 100% correct. I
8 think the reason we provided input into you which
9 caused you to make the decision you did relative to
10 271. Specifically our basis for not being at parity
11 is because today, through the EDI, or electronic data
12 interexchange interface that we use for ordering with
13 BellSouth, there's no pre-order functionality, which
14 is where due date calculation would belong. And in
15 order to calculate or determine what that due date is,
16 we need a mechanism by which we can do that.

17 Today, if we chose to use the LENS interface
18 to do that, there's no comparable way to do that in
19 LENS in the inquiry mode, which would be the mode we
20 would have to do to go in to attempt to identify what
21 a potential due date might be.

22 **COMMISSIONER CLARK:** Okay. What did the
23 Commission's order find on that point?

24 **WITNESS GREEN:** The Florida Commission?

25 **COMMISSIONER CLARK:** Right.

1 **WITNESS GREEN:** I don't have that
2 information directly here. I can provide that
3 information, or if Mr. Melson has it we can read it
4 in.

5 **COMMISSIONER CLARK:** The other thing I
6 wanted to ask you, did I understand your concern
7 about -- let me ask you if this is correct. When
8 there's a service jeopardy, it is the -- not the sales
9 representative from BellSouth that calls BellSouth's
10 customer, it's the group that's doing the installation
11 will call, is that correct, and say that they are not
12 going to make it?

13 **WITNESS GREEN:** I'm not 100% in sync with
14 which individual group actually calls the customer. I
15 have been led to believe that it is the maintenance
16 center that either calls the customer or notifies the
17 account team to let them know that that date won't be
18 met such that they can call the customer.

19 **COMMISSIONER CLARK:** Okay. I thought your
20 objection was that for you to notify your customer,
21 you get a call from maintenance and then you have to
22 call the customer. Whereas, in BellSouth it somehow
23 comes up on their system, and the maintenance or the
24 people who are going to do the installation actually
25 do the call and they don't have to call the service

1 rep. Therefore, you eliminate that step.

2 **WITNESS GREEN:** There's a group of issues
3 relative to service jeopardy.

4 One is, BellSouth, the company, knows
5 immediately that there's the potential that a due date
6 may be missed because of what they've defined as a
7 service jeopardy, which can include no facilities
8 available at the customer site, bad pairs or some
9 other internal reason why the date won't be met. That
10 information is populated into their system
11 immediately.

12 Our issue is that BellSouth may know that
13 well in advance for us as well, but we don't get the
14 information from BellSouth typically until day of cut,
15 and at that time BellSouth will pick up the phone and
16 call the -- what's defined as the C-con, or the
17 carrier contact, which would be the person who issued
18 the order from MCI, and would pick the phone up to
19 call them to notify them back that we're not going to
20 be able to make this due date.

21 **COMMISSIONER CLARK:** Then are you saying
22 that the sales rep who is setting up the due date will
23 have the information that, right then, that they can't
24 make the date?

25 **WITNESS GREEN:** Are you asking about the

1 BellSouth sales rep.

2 **COMMISSIONER CLARK:** Yes, I am.

3 **WITNESS GREEN:** It probably would not happen
4 that same day but shortly thereafter, after the order
5 is being worked, or while the order is being worked,
6 they would identify it far enough in advance such that
7 they could set the appropriate expectation with the
8 customer. And also make sure if there were going to
9 be some additional -- what we term as customer
10 provided equipment, or CPE vendors -- they could
11 coordinate those schedules with them as well.

12 This truly becomes an issue when you start
13 to look at it from the business customer side of the
14 house where you are typically dealing with multiple
15 parties to get service installed.

16 **COMMISSIONER CLARK:** What is it you want
17 from BellSouth on this issue? You said it should be
18 electronic. What do you mean by that? How do they
19 notify you now that it's in jeopardy?

20 **WITNESS GREEN:** I'm sorry, the last part of
21 the question?

22 **COMMISSIONER CLARK:** How do they notify you
23 now that it's in jeopardy?

24 **WITNESS GREEN:** By the telephone or by fax.
25 What we're asking BellSouth to provide to us is in

1 essence the exact same information they provided to us
2 for another part of a jeopardy.

3 When we got into this development process
4 with BellSouth, we identified early on that jeopardies
5 were not electronic. So we went and asked BellSouth
6 through meetings, discussions to automate jeopardies.
7 BellSouth came back to us and said "We can automate
8 jeopardies, but we will automate jeopardies for what
9 we define "missed appointment jeopardies," which are
10 jeopardies where the customer caused the date to be
11 missed. Either they weren't home or weren't ready to
12 have the service turned up. And BellSouth automated
13 that process but chose not to automate the service
14 jeopardy process. So what we're asking for from Bell
15 South is for them to automate the service jeopardy
16 portion as well, which would notify MCI electronically
17 of the reason that a service is -- or a due date,
18 rather, is going to be missed. That will allow us to
19 do a couple of things.

20 One, it would allow us to update our systems
21 with the appropriate information; send back the -- a
22 new due date to BellSouth if we had to pick a new due
23 date because the customer wasn't going to be
24 available, and also give as an opportunity to notify
25 the customer in a timely manner that their service

1 won't be turned up for whatever the reason was.

2 **COMMISSIONER CLARK:** Is your issue then the
3 timing of when you get that information?

4 **WITNESS GREEN:** The issue is twofold. The
5 issue is number one, that it's a manual process today
6 which requires us to have -- which really drives
7 additional cost into our business; doesn't allow us to
8 automate that information into our systems
9 electronically. We have to go in and put in that
10 information. We may have to file these service
11 jeopardies some place, and because it's in a paper
12 format, or phone, causes some additional concern, as
13 well as the timing issue relative to when we get
14 service jeopardies from BellSouth.

15 **COMMISSIONER CLARK:** Just so I'm clear, you
16 said the only service jeopardies they have automated
17 is customer caused service jeopardies.

18 **WITNESS GREEN:** And they don't call the a
19 service jeopardy. BellSouth defines that as a missed
20 appointment jeopardy, and they've taken the phrase
21 "jeopardy" and split them into two types: One is
22 considered missed appointment jeopardy, and the other
23 one is considered service jeopardy. The missed
24 appointment jeopardy has been automated; the service
25 jeopardy has not been.

1 **COMMISSIONER CLARK:** So what's been
2 automated is when the customer calls and says "I can't
3 miss (sic) it" or when the customer has, in fact,
4 missed it? And why would they be calling BellSouth
5 and not you to tell --

6 **WITNESS GREEN:** Not that the customer is
7 calling BellSouth. BellSouth may have gone to the
8 prem to have the service installed. The customer is
9 not there. So then BellSouth would send us back the
10 missed appointment jeopardy saying, "We tried. We
11 couldn't do it. You need to tell us what new
12 installation date you want for this service."

13 **COMMISSIONER CLARK:** So the only thing that
14 is automated is when BellSouth has gone to the
15 customer's premises, or otherwise determined that the
16 customer is not going to make that. So you get an
17 after-the-fact that the service didn't get installed
18 as you promised.

19 **WITNESS GREEN:** Right. Which is generally
20 okay if the customer, for whatever reason, wasn't home
21 and missed their appointment, which is the exact same
22 thing that would happen for BellSouth.

23 **COMMISSIONER CLARK:** What you are not
24 getting is when they know -- they see for some
25 reason -- let's say they don't have the equipment

1 available -- that they are not going to make the date
2 you promised the customer, that's what is faxed or
3 telephoned to you.

4 **WITNESS GREEN:** Yes.

5 **COMMISSIONER CLARK:** What you want is for it
6 to be sent electronically.

7 **WITNESS GREEN:** Right. What we're talking
8 about being able to do that is truly a code that
9 delineates the reason.

10 Right now I get codes that delineate the
11 reason for missed appointments which are customer
12 caused. And what we're talking about now, if we were
13 to put it into perspective, are codes that identify
14 the reason for the missed service jeopardy.

15 **COMMISSIONER CLARK:** Okay. Thanks.

16 **WITNESS GREEN:** Okay.

17 **MS. WHITE:** Thank you.

18 **CROSS EXAMINATION**

19 **BY MS. WHITE:**

20 **Q** Mr. Green, my name is Ms. White. I'm
21 representing BellSouth Telecommunications. I'm sorry,
22 we laughed about "green and white."

23 But anyway, as a preliminary matter I'd like
24 to introduce the deposition exhibit of Mr. Green and
25 his late-filed deposition exhibits, and ask that the

1 next exhibit number be assigned to that.

2 **CHAIRMAN JOHNSON:** It will be assigned
3 Exhibit 8. Short title "Green Deposition and
4 late-filed exhibits."

5 **MS. WHITE:** I don't think there's any
6 objection if we go on and move that into the record.

7 **CHAIRMAN JOHNSON:** She's moving it into the
8 record at this time. Is there any objection? Seeing
9 none, show it admitted.

10 **MS. WHITE:** Thank you.

11 **MR. MELSON:** Chairman Johnson, I just note,
12 it appears that Mr. Martinez's errata sheet got copied
13 in the attachment here and that probably ought to be
14 pulled out of Exhibit 8 and go into Exhibit 3, which
15 is Mr. Martinez's deposition. It's just one sheet
16 that's physically in the wrong exhibit here.

17 **CHAIRMAN JOHNSON:** Okay. Show that
18 corrected for the record. And we'll pull it out of
19 this exhibit.

20 (Exhibit 8 marked for identification and
21 received in evidence.)

22 **Q** **(By Ms. White)** Mr. Green, is MCI providing
23 facilities-based local service in Florida today?

24 **A** I'm not 100% sure of that. In Florida
25 today, I don't know. I'm going have to say I don't

1 know 100%.

2 Q Okay. Well, you state that one of the
3 counts in this complaint is the fact that you aren't
4 receiving firm order confirmations for off-net T-1s.
5 Is that correct?

6 A That's correct.

7 Q And that's a situation you claim is
8 occurring in Florida?

9 A Yes.

10 Q And if you're not providing local service in
11 Florida, then I don't understand why you would be
12 ordering off-net T-1s for local service.

13 A Well, we're ordering off-net T-1s in Florida
14 for local service. I thought your question was around
15 facilities based, which may have confused the matter.
16 But we are ordering off-net T-1s for local service in
17 Florida.

18 Q Do you consider off-net T-1s to be unbundled
19 local elements? Unbundled network elements, excuse
20 me.

21 A I don't consider off-net T-1s in the manner
22 by which they are being provisioned by BellSouth today
23 to be unbundled elements.

24 Q Okay. Well, you're going to take those
25 off-net T-1s and you hook them up to a MCI switch,

1 right?

2 A Yes, we do.

3 Q That switch is in Florida, right?

4 A Yes, it is.

5 Q And that switch makes you a facilities-based
6 local carrier, doesn't it?

7 A Yes, it does.

8 Q So MCI is providing facility-based local
9 service in Florida today?

10 A Okay. Yes.

11 Q I mean do you agree with that?

12 A Yes, I do. We are providing off-net T-1s in
13 Florida for local service.

14 Q Do you know whether you're providing service
15 to residential or business customers?

16 A I believe that that service is being
17 provided to business customers.

18 Q And the customers are being served primarily
19 through those off-net T-1s?

20 A That's accurate.

21 Q Now, you're ordering those off-net T-1s via
22 the FCC access tariff, correct?

23 A I'm ordering those via the ASR through NCNCI
24 codes that are placed on the ASR.

25 Q Are you ordering this facility out of the

1 FCC access tariff?

2 **A** My understanding is that the way we order
3 those services is via an ASR, which goes through, I
4 guess, the BellSouth EXACT system. And the way we
5 order those services is utilizing NCNCI codes. And I
6 don't know if those NCNCI codes are -- NCNCI codes
7 aren't assigned to an FCC access tariff, so we're not
8 using any USOC to order that. I think you are pricing
9 them via the access tariff.

10 **Q** Well, and I'm not trying to trick you,
11 Mr. Green, if you would just look at Page 74 of your
12 deposition, line 12 and 13, the question is are you
13 ordering the T-1 from the access tariff? And your
14 answer is yes.

15 **A** I'm sorry. What page is that?

16 **Q** 74. Lines 12 and 13.

17 **A** 74. (Pause) I'm sorry, give me the page
18 number one more time?

19 **Q** Page 74 of your deposition.

20 **A** It does say "yes" in there. And like I
21 said, I believe that based on the NCNCI code that's
22 being used on that order, those then are being ordered
23 out of the access tariff.

24 As I went back and identified further with
25 the group that is ordering off-net T-1s, they told me

1 they ordered via NCNCI codes. And it's priced out of
2 the access tariff. So my answer there is accurate.
3 What you're getting today is a little more clarity
4 around that answer.

5 **COMMISSIONER CLARK:** Can I ask a question?
6 I didn't understand what codes you said.

7 **WITNESS GREEN:** I'm sorry. Network channel
8 network channel identifiers codes. What those are are
9 codes that go on an order that define the actual
10 functionality that the copper pair, let me call it, is
11 going to provide. And there's a number of different
12 NCNCI codes that you would put on an order.

13 **COMMISSIONER CLARK:** N C --

14 **WITNESS GREEN:** N-C-N-C-I.

15 **COMMISSIONER CLARK:** Network channel --

16 **WITNESS GREEN:** Network channel network
17 channel identifier.

18 **COMMISSIONER CLARK:** Okay.

19 **Q** (By Ms. White) Just so I'm clear, you're
20 ordering the off-net T-1s from the access tariff,
21 correct?

22 **A** By default, yes.

23 **Q** Does the access tariff have a requirement
24 that BellSouth return an FOC on access orders?

25 **A** I believe it does.

1 Q Does the access tariff state when firm order
2 confirmations are to be returned on access orders?

3 A I believe it does.

4 Q And what does it say?

5 A If I'm not mistaken it's been shared with me
6 this it says 48 hours.

7 Q And that's in the access tariff?

8 A I believe it does. But I'm not 100%
9 familiar with the access tariff. It's information
10 that's been shared me.

11 Q Can you provide me as a late-filed exhibit
12 the page out of the Access Tariff where it says firm
13 order confirmations are going to be return in 48
14 hours?

15 **MR. MELSON:** Chairman Johnson, I believe
16 that provision is not in the Access Tariff. It's my
17 understanding that's an industry standard. I'd be
18 willing to stipulate that it's an industry standard
19 and not specifically set out in the Access Tariff.

20 **MS. WHITE:** I'll accept that stipulation and
21 won't need the late-filed exhibit.

22 Q **(By Ms. White)** Are BellSouth and MCI
23 discussions right now, separate and apart from this
24 proceeding, on when firm order confirmations are to be
25 returned for access services?

1 **A** I don't know if we are or not. What I do
2 know is that there was a letter submitted from a
3 director out of eastern financial, Charlene Keys, that
4 requested to have a meeting with BellSouth relative to
5 the provisioning of firm order confirmations. And I
6 believe that that meeting has taken place. I'm not
7 sure what the outcome of that meeting is or was. But
8 I could almost safely say that there's probably
9 ongoing meetings to discuss timeliness of firm order
10 confirmations back from BellSouth.

11 **Q** How does MCI send the off-net T-1 orders to
12 BellSouth?

13 **A** Today --

14 **COMMISSIONER CLARK:** The off-net what?

15 **MS. WHITE:** T-1. T-1 orders to BellSouth.

16 **WITNESS GREEN:** Today, to the best of my
17 recollection, I believe that we send that information
18 over to BellSouth via the Netpro interface. Now,
19 prior to utilizing Netpro I believe those orders were
20 sent over to BellSouth via fax.

21 **COMMISSIONER CLARK:** What is off-net?

22 **WITNESS GREEN:** Off-net is a name for a
23 local service that we provide to a customer where we
24 have a ring, an MCI fiber ring, where we can provision
25 service off of. And if the customer is on that ring,

1 able to be served within the proximity of that ring,
2 then that customer would be served by what we define
3 as on-net services. If that customer's location
4 cannot be served from that fiber ring, then we would
5 service that customer with off-net T-1 facilities,
6 which would be a digital service that would link the
7 customer's prem back to the MCImetro switch that is
8 located on that fiscal fiber ring.

9 **COMMISSIONER CLARK:** That's the equivalent
10 of the local loop?

11 **WITNESS GREEN:** Yeah. Roughly it's the
12 equivalent of the local loop.

13 **COMMISSIONER CLARK:** What you talk about as
14 being off-net, because it's off your network?

15 **WITNESS GREEN:** Right.

16 **Q** (By Ms. White) So off-net T-1, isn't it a
17 combination of loop and transport?

18 **A** Broken into unbundled network elements, yes.

19 **Q** Now, you stated that today you send the
20 orders for T-1s, off-net T-1s via Netpro? What is
21 Netpro?

22 **A** Netpro is the interface that's used to
23 submit ASRs to BellSouth and to -- other carriers, I
24 believe use Netpro as well -- so it's electronic means
25 to submit access or ASR orders to an ILEC.

1 Q Okay. Now, you said earlier you used fax.
2 When did you go to Netpro?

3 A I'd say we went to Netpro within the last 30
4 days sending those orders to BellSouth. And there was
5 a number of issues relative to why we were not able to
6 use Netpro, which goes into BellSouth's reluctance --
7 or the actual permission to use what is defined as a
8 customer name mixed with a terminating location.

9 Q And I understand that, Mr. Green. You
10 stated that prior to using Netpro, MCI used fax to
11 send these orders to BellSouth; is that correct?

12 A That's correct.

13 Q Did MCI fax these orders to BellSouth's
14 interexchange carrier service center or the local
15 carrier service center?

16 A I'm not 100% sure, so I'll answer this
17 subject to check, but I believe we were sending those
18 orders to the ICSC.

19 Q Okay. And are you aware that the ICSC
20 handles orders for interexchange carriers and the LCSC
21 handles orders for local exchange carriers?

22 A It was my understanding that everything went
23 to the access side of the world that was ordered off
24 of an ASR, including unbundled digital loops that
25 would be ordered off of an ASR would go through I

1 guess the EXACT system, which would be supported by
2 the ICSC, to the best of my understanding.

3 **COMMISSIONER CLARK:** Hang on a minute. What
4 is ICSC and what is LCSC? One is local and one is --

5 **MS. WHITE:** ICSC is interexchange carrier
6 service center, and LCSC is local carrier service
7 center.

8 **COMMISSIONER CLARK:** And it's your testimony
9 that it goes into the interexchange carrier. Is that
10 right?

11 **WITNESS GREEN:** That's correct.

12 **COMMISSIONER CLARK:** So the answer was yes.

13 **MS. WHITE:** Yes.

14 **Q** **(By Ms. White)** And you were sending those
15 orders to the same -- faxing those orders to the same
16 center that MCI long distance sends its access orders
17 to; is that correct?

18 **A** I believe so, yes.

19 **Q** Now, is MCI providing any local service via
20 resale in Florida?

21 **A** No.

22 **Q** Do you know whether it intends to?

23 **A** Right now the business plan for MCI, based
24 on rates and other issues relative to resale service,
25 is that we do not plan today to offer resold services.

1 Q Now, with regard to operational support
2 system information, or OSS, would you agree that the
3 FCC has found that there are five basic OSS functions
4 to which ALECs must have access, and that would be
5 preordering, ordering, provisioning, billing and
6 maintenance?

7 A Yes.

8 Q And you're looking for information on the
9 databases that are used by BellSouth for its retail
10 side with respect to those five functions?

11 A The reason I hesitate is because you put
12 retail side in there. But we're looking for general
13 OSS functionality relative to those five functions of
14 OSS.

15 Q Okay. And I guess the reason I put retail
16 side in is because I want to distinguish what you're
17 looking for is not information about the OSS systems
18 that BellSouth is offering the ALECs. What you're
19 looking for is information on the OSS systems that
20 BellSouth uses for its right to conduct its retail
21 business, correct?

22 A Yes, in order for us to assess parity and
23 what we have available to us on what I guess we define
24 as wholesale side versus the retail side.

25 Q Does MCI want access to BellSouth's

1 databases that BellSouth uses for purposes of
2 marketing?

3 A First of all -- the answer to the question
4 is no. And what we're talking about here is really
5 the sharing of information relative to that. I mean,
6 access to those systems, I guess, would be determined
7 by the need to be able to have some function or
8 capability relative to what the database provided to
9 BellSouth. So that parity question, I guess, jumps in
10 to that answer.

11 Q Okay. Let's talk about that for a minute.
12 I think earlier in response to a question from
13 Commissioner Clark you stated that -- you mentioned
14 the Florida Commission's decision on BellSouth's 271
15 application. Do you recall that?

16 A Yes.

17 Q Have you read that Order?

18 A I have not read it in its entirety, no.

19 Q Have you read that Order on, the section of
20 the Order on performance measurements?

21 A When it first came out I did. I don't
22 recall it 100% verbatim.

23 Q Do you recall the Commission said in that
24 Order that parity should be shown by performance
25 measurements and by empirical evidence?

1 A I do recall that verbiage.

2 Q Now, does MCI want access to BellSouth's
3 databases regardless of whether MCI needs a particular
4 database to provide local service?

5 A The answer to that question is going to be
6 no. And, again, just to put it in context, the
7 general request for OSS was the result of our dealings
8 with BellSouth and getting pieces of information from
9 BellSouth which delayed the development process we
10 were going through at the time.

11 So through the fact that we were identifying
12 multiple databases throughout our -- development cycle
13 with BellSouth prompted us to say maybe we don't have
14 access to all of the information that we need.

15 One particular case in point that comes to
16 mind for me with that is the fact that we found out
17 from BellSouth's customer service representatives that
18 a P/SIMS, products and service information matrix
19 database is a database that is not used by BellSouth.
20 Only other than to identify whether or not ISDN
21 service is available at a particular wire center.

22 While it had always been conveyed to us that
23 that P/SIMS database was the database by which we
24 would identify all products and services available out
25 of a wire center.

1 So that, in addition to identifying other
2 databases that we had no information of, prompted us
3 to request that information from BellSouth.

4 **Q** **(By Commissioner Clark)** I don't think I
5 understood that.

6 **WITNESS GREEN:** Okay.

7 **COMMISSIONER CLARK:** You said that that
8 database system -- you decided you needed that
9 database system because you found out it was being
10 used to tell you whether ISDN was available in a
11 central office?

12 **WITNESS GREEN:** No. What happened in that,
13 if I were to take it from the ground up, is BellSouth
14 offered to provide us the P/SIMS database via a
15 download.

16 **COMMISSIONER CLARK:** What database?

17 **WITNESS GREEN:** Products and services
18 information matrix database. We call it P/SIMS.
19 P-S-I-M-S database.

20 **COMMISSIONER CLARK:** Okay.

21 **WITNESS GREEN:** We accepted the database.
22 Once we got the database, and as we identified that
23 there were a number of errors in the database that
24 were so prevalent that BellSouth couldn't use them in
25 the day-to-day operation of their business.

1 When we were a part of some demonstrations
2 with BellSouth and we asked the customer service
3 representative at that time if we used P/SIMS, the
4 information they provided to us is that P/SIMS is used
5 on a very, very limited basis only to identify whether
6 or not ISDN services are available in a particular
7 wire center. And that the database they use -- and I
8 may be getting the database mixed up here -- but I
9 believe they said they use BOCRIS on a regular basis,
10 and not P/SIMS.

11 That caused some questions in our mind
12 relative to what we were doing with BellSouth in
13 developing the operational support systems that
14 prompted this request so that they could divulge in
15 one shot what databases were; give us a description of
16 those databases so that we can then determine whether
17 or not it was something that we needed to have access
18 to or not.

19 **COMMISSIONER CLARK:** Okay. So I understand
20 your testimony, you felt that P/SIMS data system
21 wasn't performing the function that they said it would
22 because it had too many errors. And, in fact, you
23 found out they weren't using that system for the type
24 of functions you were wanting to perform. They were
25 using BOCRIS. And that's what has caused you to want

1 to see all of their OSS systems.

2 **WITNESS GREEN:** Correct.

3 **COMMISSIONER CLARK:** Okay.

4 **Q** **(By Ms. White)** Mr. Green, where is it in
5 your testimony that BellSouth isn't using P/SIMS every
6 day for the product and service information?

7 **A** It's not in my testimony.

8 **Q** And if I were to tell you that BellSouth's
9 regional navigation system, or RNS, that BellSouth
10 uses for its retail orders, does use P/SIMS every day
11 would you tell me I was wrong?

12 **A** I would not tell you you were wrong, but I
13 would ask if they used it to identify products and
14 services available out of a wire center; if they used
15 it on an every day basis only to identify whether or
16 not ISDN services were available in a particular wire
17 center.

18 **Q** And if my answer is yes, then what is your
19 position?

20 **A** Then my position would be that somebody
21 doesn't have the correct information.

22 **Q** Right. Now, by the way, is it correct that
23 MCI has witnessed several demonstrations of
24 BellSouth's RNS systems and DOE system?

25 **A** Multiple representatives from MCI have seen

1 those demonstrations, yes.

2 Q And those demonstrations have taken place in
3 states other than Florida, have they not?

4 A That's true.

5 Q And MCI has participated in all of
6 BellSouth's 271 cases, both at the state commission
7 level and FCC level?

8 A Yes.

9 Q And MCI has participated in OSS workshops at
10 the state level?

11 A Correct.

12 Q Has the FCC stated in any 271 proceeding
13 that BellSouth or any RBOC is required to do what MCI
14 is requesting?

15 A I don't recall the FCC ever stating that.

16 Q Okay. Now, it's MCI's position, is it not,
17 that OSS interfaces should be based on national
18 standards?

19 A Correct.

20 Q Who sets national standards?

21 A Well, Telecommunications Industry Forum, The
22 Electronic Communications Industry Committee, Open
23 Billing Forum; these are all groups that set the
24 guidelines by which companies agree to operate which
25 by default become the standards.

1 Q And BellSouth and MCI are members of those
2 committees and forums, are they not?

3 A Yes, we are.

4 Q What preordering interface does MCI use in
5 Florida?

6 A What preorder interface do we use in
7 Florida.

8 Q That's correct.

9 A Right now we're not using any preorder
10 interface in Florida because we're not issuing any
11 resold services. Preorder for off-net T-1s -- I'm not
12 sure what functionality we use for off-net T-1s to get
13 any preorder information.

14 Q Would you agree that BellSouth offers three
15 interfaces for preordering LENS, LENS enhanced with
16 common gateway interface and EC-LITE?

17 A Yes.

18 Q Okay. Now, is there national industry
19 standards set for preordering?

20 A I have to answer that question with a yes
21 and a no, and I'll explain why.

22 The yes portion of it is they have
23 identified the underlying protocol that would be used
24 to support preordering functionality. That interface
25 functionality is defined as -- there's a group of

1 letters here -- EDI TCP/IP/SSL3. And they have
2 defined that as one of the two industry standards that
3 will be used for preordering.

4 Q And that's the protocol that MCI has
5 requested of BellSouth, correct?

6 A Yes, it is.

7 Q Do you know whether any other ALEC has
8 requested BellSouth to develop that protocol?

9 A I have no idea.

10 Q Now, you said one of two. The industry has
11 either adopted or is voting on an alternative to that
12 many-lettered protocol this month, are they not?

13 A No. It's not an alternative to, it's in
14 addition to, so they both will be defined as
15 quote/unquote "industry standards," or industry
16 guidelines or recommendations. And I don't believe
17 that vote is happening this month.

18 According to my representatives on the OBF
19 and ECIC Committees, that vote is not due to even be
20 submitted until best case, early September; worst
21 case, late December, early January '99.

22 Q Now, that other protocol is called
23 API/CORBA; is that correct?

24 A No. What is correct is the fact that the
25 protocol is called CORBA. The API portion of it is

1 not a part of the guideline.

2 Q Okay. And how much will you give me not to
3 make you say what those things stand for, but I'm sure
4 they are acronyms. They stand for long names,
5 correct?

6 A Yeah. And, you know, I'm not going to be
7 able to tell you what they stand for right now. I
8 could --

9 Q I'm sorry, go ahead.

10 A Go ahead.

11 Q Those two protocols are going to both be
12 industry standards, correct?

13 A That's if CORBA maps out the way that the
14 CORBA proponents hope that it will, the answer to your
15 question will be yes.

16 Q So there will be two industry standards for
17 preordering?

18 A Uh-huh.

19 Q And these are -- the protocols are just
20 methods of delivering information in a
21 machine-to-machine manner?

22 A Yeah. The way I like to define protocol is
23 the actual -- I guess if I used an analogy, it would
24 be the envelope by which the information was passed
25 across the connections.

1 Q And BellSouth has begun development of the
2 EDI TCP/IP interface, have they not?

3 A I'm sorry. You said BellSouth?

4 Q Yes?

5 A No.

6 Q They have not begun development?

7 A Of the TCP/IP program. No, they have not.

8 Q Are they in the process of developing the
9 CORBA protocol?

10 A Yes.

11 Q Now, let's back up a minute to LENS enhanced
12 with the common gateway interface, or CGI. I know
13 that we have some disagreements about when you receive
14 them, but as of today MCI has the latest CGI
15 specification, correct? To your knowledge?

16 A And the only reason -- the answer would
17 normally be yes, but I know there's been some upgrades
18 to LENS and I don't know if we've received the latest
19 CGI specifications or not. But in lieu of having that
20 information, I'd default and say for the most part we
21 do.

22 Q Okay. And MCI doesn't use LENS, correct,
23 for preordering, or ordering?

24 A No, that's not 100% correct. With the CGI
25 specifications -- it's always been our position with

1 BellSouth, that we were going to use as an interim the
2 LENS CGI specifications to ascertain customer service
3 records from the BellSouth LENS interface, which is
4 what we are in the process of trying to figure out how
5 to really use that data in a effective manner.

6 Q Okay.

7 COMMISSIONER JACOBS: Excuse me. This is
8 the arrangement whereby you do get the customer
9 information electronically, but you're unable to
10 interpret the actual data because you don't have the
11 format or something like that?

12 WITNESS GREEN: Yeah. Let me go into that
13 in a little detail, if you would.

14 When we received the CDI specifications from
15 BellSouth, the MCI technical team went in and tried to
16 develop those CGI specifications that would give us
17 the capability of acquiring the customer service
18 record from the BellSouth server and having that
19 information be downloaded to us in a electronic usable
20 format.

21 COMMISSIONER JACOBS: So you want to get the
22 format plus the actual data that it relates to
23 electronically.

24 WITNESS GREEN: In order for us to make
25 heads or tails out of the data, we needed to know the

1 format for the data. Otherwise, all we would be able
2 to do truly would be to present that information on
3 the screen, which is far easier than loading that
4 information into a database for effective use.

5 And what our findings indicated to us was
6 that number one, the specifications were not complete
7 in order to allow us to do that. And that the
8 specifications relative to the customer service record
9 were not available. And that all we can truly do with
10 the information is download it to our system, but we
11 could not break that data up into its discernible
12 parts.

13 In other words, I couldn't break up first
14 name from last name because I didn't have what we
15 define as a record layout or a scheme, which drove me
16 to only being able to parse, separate that information
17 into blocks of data which are no good if you wish to
18 use it in a machine-to-machine format.

19 Now, throughout that whole process BellSouth
20 had employed the services of a company called Albion
21 to do exactly what MCI was attempting to do with the
22 CGI specifications. And as a result of that effort,
23 and the fact that there was a press release relative
24 to Albion's success in doing that, MCI contacted
25 Albion to try to get the information relative to their

1 efforts with BellSouth. And that information was
2 actually -- our leeway for going to Albion to get that
3 was based on some information out of Bill Stacy's
4 deposition.

5 **COMMISSIONER JACOBS:** That being the actual
6 format.

7 **WITNESS GREEN:** Go to Albion and you can get
8 the technical specifications that they used that
9 allowed them to do what you guys are not able to do
10 with CSR. They were successful, you were not.

11 When we spoke to Albion we got confirmation
12 that our issues were the exact same issues as Albion.
13 When we spoke to them just last week, comments from
14 Albion were that the -- a lot of the CGI information
15 as not clear potential for CSR, not to parse right.
16 No BST CSR technical informations were provided or
17 available. In the current form, the CSR parse is
18 impossible. Address may or may not have directional
19 information. Street name may be one or two words in
20 length which causes a problem; says field by field
21 practically impossible to parse.

22 All of these things go back to support our
23 claims relative to the need for this information. And
24 the fact that we are unable to use that data as it
25 comes across the CGI specification. So while we have

1 tried to do it we have been unsuccessful because the
2 information is not complete.

3 **COMMISSIONER JACOBS:** And this was a -- this
4 was in the effort to upgrade from a prior process? In
5 other words, you had been conducting this function
6 manually or in some other manner prior to moving the
7 attempt at electronic interface?

8 **WITNESS GREEN:** MCI never truly began to use
9 in a real production many LENS for acquisition of
10 CSRs. We would look at the functionality. We would
11 try to figure out how it worked, and we identified
12 from our efforts -- and we did use it in a resale
13 trial that we did last year in Georgia, which gave us
14 a lot of the information relative to how cumbersome
15 LENS was to use in a production environment. And we
16 decided at that time that we could use LENS in its
17 current mode in a day-to-day business because it was
18 just absolutely too cumbersome, too many delays. And
19 that the information that we got only came across in a
20 paper format, or electronically, and we could print
21 it. But we had no way of storing that information
22 into a data business. So at that time we asked
23 BellSouth for the CGI specifications because they were
24 touted at that time as being the means by which you
25 would go back electronically downloading that

1 information and we began on that effort. So when you
2 say it was an upgrade, yeah it was an upgrade from the
3 manual process but it's still not ultimately where we
4 want to be long term.

5 **COMMISSIONER JACOBS:** Okay. Thank you.

6 **Q (By Ms. White)** What ordering interface
7 does MCI use in Florida?

8 **A** Again, we will be using the EDI interface
9 7.0 that we're in development with BellSouth on today.

10 **Q** How long has MCI been in development on
11 that?

12 **A** I believe we began discussion about that
13 interface in January. So it's been about seven or
14 eight months that we have been in development for EDI
15 7.0. BellSouth actually turned 7.0 up, I believe, per
16 their specifications, sometime in March, mid-March if
17 I'm not mistaken.

18 **Q** Now, I'd like to talk about the street
19 address guide data for a while.

20 **A** MCI has electronic access to the street
21 address guide on a real-time basis via LENS, does it
22 not?

23 **A** Yeah. LENS does provide real-time
24 electronic access to RSAG.

25 **Q** Does MCI have access to the street address

1 guide on a real-time basis via the interexchange
2 carrier reference validation?

3 **A** MCImetro, the local company, does not, but I
4 would agree with you that ICREF is another means by
5 which you could go about accessing the RSAG data.

6 **Q** Are you saying MCImetro can't use the
7 interexchange carrier reference validation?

8 **A** I'm not saying that they can't. I'm saying
9 that MCImetro does not.

10 **Q** Does not use it?

11 **COMMISSIONER CLARK:** Ms. White, would you
12 ask the first question again.

13 **MS. WHITE:** Yes. Whether they have
14 electronic access to the street address guide on a
15 real-time basis via LENS. And then I asked whether
16 they have electronic access to the street address
17 guide on a real-time basis via it's ICREF, but I'm
18 trying to avoid the acronyms. It's the Interexchange
19 Carrier Reference Validation.

20 **COMMISSIONER CLARK:** And the answer is yes.

21 **Q** **(By Ms. White)** They have access to it.
22 You're not using it but MCI has access to it?

23 **A** It's available to be used. MCI is not using
24 that interface for address validation.

25 **COMMISSIONER CLARK:** Why not? What's the

1 problem with using that?

2 **WITNESS GREEN:** I mean it's the problem with
3 using ICREF, it's the problem with using LENS. It's
4 the fact that these interfaces or these systems are
5 not integratable for the ordering functionality.

6 **COMMISSIONER CLARK:** You have the same
7 problems as LENS.

8 **WITNESS GREEN:** Exact same problem. I would
9 pull the information off of the screen and then I
10 would have to retype it into my system. I wouldn't
11 have anyplace to store that data. It's basically a
12 retrieval system that would allow me to grab the data
13 and then I'd have to turn to my systems and retype it.

14 Our issue from the beginning is that we want
15 integratable preorder functionality ability.
16 Downloading of the RSAG database gives us the
17 capability of incorporating that into our system so
18 that we can pre-populate orders with that information
19 and save on the potential for error because I typed it
20 wrong, and save on time and save on cost.

21 **Q** **(By Ms. White)** Now LENS and the ICREF --
22 ICREF.

23 **A** ICREF.

24 **Q** ICREF means of electronic access also
25 include updates of the street address guide, do they

1 not?

2 A I would say yes, I guess by default, because
3 BellSouth will be updating their RSAG database means
4 that you would be accessing up-to-date information
5 through those systems.

6 Q Now, you were present when Mr. Carver was
7 cross examining Mr. Martinez?

8 A Yes.

9 Q Did you hear Mr. Carver ask Mr. Martinez
10 about the Georgia OSS order?

11 A Yes, I did.

12 Q And are you familiar with that Order?

13 A Yes, I am.

14 Q And in that Order apparently the Georgia
15 Commission stated that BellSouth should provide a
16 download of the street address guide?

17 A Correct.

18 Q And is it your understanding that BellSouth
19 is going to follow that order?

20 A It's my understanding that BellSouth has the
21 intention to do that. And as a matter of fact, just
22 today I was notified of a meeting that we're trying to
23 put together for that next week.

24 I guess the question at hand, which, you
25 know, I would hope to get -- one of the issues, at

1 least, I would hope to get resolved in the meeting
2 next week with BellSouth would be the scope of the
3 data provided. Is it available for the entire region,
4 or is BellSouth only intending on providing it for the
5 state by which they have been ordered to do so?

6 Number one. And then the other issue is an issue that
7 will not even be addressed in the form that we have
8 next week, which will be the cost issue.

9 Q Let's take those two things separately. If
10 BellSouth says to you that download is going to
11 include Florida information, is this issue moot right
12 now?

13 A In the state of Florida -- BellSouth came
14 back and said that we will provide you data for both
15 Georgia and Florida. I would say that it would be a
16 moot point in those two states with the exception of
17 the cost issues.

18 Q Okay. Now, let's talk about the cost issue.

19 In the Georgia OSS order, didn't the Georgia
20 Commission say "BellSouth and MCI, go negotiate the
21 cost. And if ya'll can't negotiate it, we'll -- come
22 back to us"?

23 A No.

24 Q Okay. Is there a cost docket going on at
25 the Georgia Commission about this?

1 A I recall references made to a cost document
2 relative to just OSS costs in general. And this cost
3 would be one of those.

4 Q Okay. Is MCI asking in this proceeding
5 before the Florida Commission that the Commission
6 decide whether MCI should bear any of the cost of the
7 download?

8 A Yes.

9 Q Okay. Where is that?

10 A It's not written in my testimony at all.

11 Q Is MCI willing to bear any of the cost of
12 developing and obtaining the download?

13 A No. Because as Mr. Martinez indicated in
14 his testimony earlier today, based on MCI's
15 interpretation of the Interconnection Agreement, we
16 don't feel we're obligated for any burden of costs
17 relative to RSAG. And, again, if you compare it to
18 the MSAG database it's not any different.

19 Q And your position on that is because it's
20 your position that the Interconnection Agreement
21 requires BellSouth to provide the download?

22 A That's MCI's position, yes.

23 Q If your position is proven wrong, and MCI --
24 and BellSouth is not required under the
25 Interconnection Agreement to provide the download,

1 then is it MCI's position that it would bear any of
2 the cost for providing the download? I'm sorry. That
3 made no sense. I apologize.

4 What I'm trying to say is -- if this
5 Commission --

6 **COMMISSIONER CLARK:** I thought I understood
7 it. (Laughter)

8 **MS. WHITE:** Oh.

9 **COMMISSIONER CLARK:** You're saying if we
10 determine your agreement doesn't require that, will
11 you be willing to pay for it?

12 **MS. WHITE:** Absolutely. Or pay some of it.

13 **WITNESS GREEN:** Pay for some of it. You
14 know, because I'm not one that deals with cost it's
15 difficult for me to say yes or no. My assumption here
16 would be that if we were ordered to pay for it --
17 because my assumption is that I'm going to receive it
18 probably before the Commission gets an opportunity to
19 rule on costs, then we would have some obligation to
20 pay the cost.

21 **Q** (By Ms. White) Now, let's talk about due
22 date intervals for a little while. It's true that MCI
23 has been provided with the intervals associated with
24 particular kinds of orders; is that correct?

25 **A** Yes. Through paper means, BellSouth has

1 shared with us intervals for services.

2 Q And it's true that MCI has access to an
3 installation calendar via LENS that tells you on an
4 calendar the next day its open in a particular work
5 center, correct?

6 A I don't think I caught all of the question,
7 if you could ask it one more time for me, please.

8 Q Okay. I'm sorry. I asked if it was true
9 whether MCI has access via LENS -- and I think it's --
10 the actual calendar comes from DSAP, which is the
11 direct order entry support application program,
12 installation calendar on LENS that tells you on a
13 calendar the next day open in a particular work
14 management center?

15 A Yes. We do have access to the LENS system
16 that would provide you with the calendar for when a
17 wire center was open. They would actually also share
18 with you what potential intervals you could expect
19 depending on the type of service you ordered. I don't
20 know if that correlates back to the paper version that
21 BellSouth has provided us. And I believe it also
22 shares with you the dates that a particular --
23 actually, it doesn't share with you the dates that
24 it's open. It shares with you the dates that a
25 particular wire center is not available or is not

1 open.

2 Q Okay. But MCI does not use LENS, right?

3 A Correct.

4 Q So what MCI wants is an automatic process
5 installed that will look at the intervals that
6 BellSouth has given MCI, and lay it down on a calendar
7 that BellSouth has already given MCI, and calculate
8 the date that service can be provided?

9 A Well, yes to the question, but let me
10 explain that in a little more detail. Because what
11 we're asking for is due date calculation capability
12 provided to us electronically.

13 In the interim, the only means necessary --
14 and the interim being until we negotiate with
15 BellSouth the development of the preordering interface
16 built on the TCP/IP/SSL3 application -- then LENS may
17 serve as potential interim to calculate due dates for
18 some services.

19 I will caution you, however, with the fact
20 that LENS does not provide anything relative to
21 unbundled network elements which would be the primary
22 service delivery method we would use when we enter
23 into the market.

24 Q So are you essentially asking BellSouth to
25 count up the days for you?

1 **A** No. I'm actually asking BellSouth to
2 calculate the due date, just like they do for
3 themselves.

4 **Q** Isn't that matter of counting up days?

5 **A** I think it's a combination of counting up
6 days, determining what services are available,
7 determining what the interval is for a particular
8 service.

9 Right now the matrix that BellSouth provides
10 to us has anything -- anywhere from a ICB, or an
11 individual case basis depending on the number of
12 services you order, to seven days or weeks. So I mean
13 if you want to simplify it and call it simply counting
14 the days up, while I don't necessarily agree with that
15 I'd say yes.

16 **Q** Now, is this issue only comes into play when
17 a dispatch is required on an order. Is that a fair
18 statement?

19 **A** No.

20 **Q** Okay. Why don't you agree with that
21 statement?

22 **A** I don't agree with it because I need to know
23 the intervals regardless of whether or not a dispatch
24 is necessary or not. I believe -- and I'm calling
25 from recollection, it's either 9 or 15, depending on

1 the number of lines I'm ordering, whether a dispatch
2 is necessary or not, drives an entirely different
3 interval. As a matter of fact, it's considered
4 individual case basis which needs to be negotiated by
5 BellSouth. So it's irrespective of whether a dispatch
6 is necessary.

7 Q Let me ask it this way: Does this issue
8 come up when it's a switch "as is" order?

9 A No. Because I believe switch "as is" orders
10 should be done within 24 hours.

11 Q Does this come up when it's an order where
12 someone is just adding or changing features?

13 A It should not because service should already
14 be turned up. It should be nothing more than a
15 manipulation of the switch.

16 Q Now, I think you stated earlier that the
17 firm order mode of LENS does the calculation that you
18 want, correct?

19 A The firm order mode, yes, it does.

20 Q So all we're talking about really here is
21 the inquire mode of LENS?

22 A Yes.

23 Q Are you aware that a modification is due to
24 make that happen, make that function available in the
25 inquiry mode in LENS by the end of this year?

1 **A** You know, I've heard varying stories on
2 that. I've heard stories that LENS will be upgraded
3 to have that functionality. But then I believe I've
4 read in other places that this issue has been teed up
5 in the Change Management Committee. So I'm hearing a
6 couple of different things here relative to
7 BellSouth's commitment to make that change. But
8 bottom line is it doesn't exist today.

9 **Q** Right. But your testimony is that you don't
10 know whether BellSouth intends to make that
11 modification and when that modification will be put in
12 place?

13 **A** My testimony is that I've heard two varying
14 stories. I don't know which one is right.

15 **Q** Now, Bell South is providing customer
16 service record information to MCI; is that correct?

17 **A** Yes.

18 **Q** And that information includes the telephone
19 number of the customer?

20 **A** Yes, it does.

21 **Q** And it includes the listed name and address
22 of the customer?

23 **A** Yes, it does.

24 **Q** And the directory listing and directory
25 delivery information?

1 A Yes, it does.

2 Q And the billing name and address?

3 A Yes, it does.

4 Q And the service address?

5 A Yes, it does.

6 Q And product and service information?

7 A I believe it provides that as well.

8 Q And it also tells you the carrier selection
9 for local toll and long distance?

10 A Yes.

11 Q And one of the items that MCI wants in the
12 customer service record is what price the customer
13 pays BellSouth for those services; is that correct?

14 A Yes, that's correct. And BellSouth has been
15 ordered to provide that as a result of that same
16 Georgia order you referred to earlier.

17 Q In your deposition you said that your
18 marketing or sales people want that BellSouth pricing
19 information; is that correct?

20 A That's correct.

21 Q Why is that?

22 A A couple of reasons. One is that it allows
23 them a quick reference with the customer to determine
24 what they are currently paying for products and
25 services today.

1 Number two, it gives us a quick audit
2 capability of what BellSouth is billing us for those
3 services because we should be receiving some discount
4 on it. And primarily, the third reason, is so that
5 they can have a record of that information in a
6 database.

7 Q Okay. Didn't you also state in your
8 deposition --

9 **COMMISSIONER DEASON:** Let me ask a question.
10 You mentioned discount. You're speaking in terms of a
11 resale discount.

12 **WITNESS GREEN:** Yes.

13 **COMMISSIONER DEASON:** I thought you said it
14 was your policy not to conduct resale?

15 **WITNESS GREEN:** That's our public policy
16 today. If the political climate changes, if the
17 pricing information becomes more conducive to make it
18 cost effective for MCI to enter into the resale
19 business, then we would jump into that business with
20 both feet.

21 Q **(By Ms. White)** But right now MCI doesn't
22 intend to be in the resale business; is that right.

23 A That's correct.

24 Q I believe you mentioned that Georgia ruled
25 on this issue. Do you know whether the Georgia

1 Commission ruled on this under the contract? Whether
2 under the Interconnection Agreement MCI was entitled
3 to this kind of information?

4 A Actually, that Georgia OSS workshop was not
5 relative to any individual Interconnection Agreement
6 or contract.

7 Q And in this case, in Florida, MCI is saying
8 that they are entitled to this information under the
9 Interconnection Agreement, correct?

10 A Yes.

11 Q And that's Mr. Martinez's, scope of his
12 testimony, correct?

13 A That's correct.

14 Q Now, one reason you said in the deposition
15 that MCI needed this pricing information was so that
16 MCI could design new services. And I'm really curious
17 on how you would use the pricing information of
18 BellSouth to design new services.

19 A I can't really answer how we would design
20 new services, but according to our marketing
21 individuals, there does exist the potential for us to
22 do that. I can't specifically say what it is we would
23 come up with relative to the products and services
24 BellSouth is providing and the pricing information.
25 So I can't give you a solid example for that.

1 Q And MCI has filed a complaint in Georgia
2 similar to what they filed here in Florida, correct?

3 A That's correct.

4 Q And the Georgia Commission has not ruled on
5 that complaint yet, have they?

6 A That's correct.

7 Q Now, I'd like to talk -- I'm almost
8 finished -- talk about service jeopardy notification.

9 If BellSouth realizes it can't complete an
10 order for one of its customers, BellSouth calls that
11 customer, correct?

12 A I believe that's the process, yes.

13 Q When BellSouth realizes it can't complete an
14 order for MCI or any other ALEC, BellSouth calls MCI
15 or that ALEC, correct?

16 A Correct.

17 Q So BellSouth doesn't notify its customers
18 electronically, does it?

19 A No. But the distinction here that we need
20 to make is whether or not BellSouth notifies BellSouth
21 electronically that it won't make that due date.

22 For example, if your techs go out in the
23 field and they find some bad pairs out there, then I
24 believe they have a handheld terminal they will use to
25 transfer that information back to the maintenance

1 center and/or installation center. Which is
2 electronic notification to the BellSouth systems that
3 they have an issue with a due date based on a service
4 situation, service jeopardy so to speak.

5 So the comparison needs to be with how
6 BellSouth notifies BellSouth of that information, as
7 opposed to how BellSouth notifies BellSouth's own
8 customers of that information.

9 Q Okay. So does what MCI want is for the
10 technician on their little handheld computer, to be
11 able to type something in and have it go from that
12 handheld computer to MCI?

13 A No. That is not what we're asking. What
14 we're asking for is something that is fairly basic and
15 simple. And that is for BellSouth to provide to MCI
16 the electronic means, EDI, service jeopardy codes that
17 we can then interpret and incorporate into our own
18 systems. And to provide us with that information in a
19 timely enough manner to allow us to communicate
20 potential service jeopardies to a customer so they
21 would have the appropriate expectation set, and be
22 able to communicate with their third-party CPE vendors
23 so that they are not wasting any time or being charged
24 any additional fees for having CPE vendors come out
25 for nothing.

1 Q And I understand that, Mr. Green. And I'm
2 not trying to trick you. I'm just trying to
3 understand. You said that you want the same
4 notification that BellSouth provides to itself.

5 BellSouth technicians use their little
6 handheld computer, type something in, you said, and it
7 goes to BellSouth systems. So what I'm asking is is
8 what MCI looking for something -- the BellSouth
9 technician types into the little handheld thing and it
10 goes to the MCI systems. Is that the method you're
11 looking for? I mean, is that ---

12 A I think.

13 Q -- I'm trying to find in a very simple
14 manner how you want this to work?

15 **COMMISSIONER GARCIA:** Let me ask you as
16 question. You just want the information, don't you.

17 **WITNESS GREEN:** I want information shared to
18 me electronically via an interface that we have up in
19 operation, that provides me with service codes for
20 missed appointment jeopardies. I want that same
21 functionality for service jeopardies such that we will
22 know in advance and in a timely manner what the status
23 and situation is for that customer. Not necessarily
24 through the handheld terminal, which would be even
25 more development effort. And I'm not even sure MCI

1 could support such a means of communication.

2 So all we want, and all we ever asked for
3 was, service jeopardy codes shared with us via EDI.
4 Real simple.

5 **COMMISSIONER GARCIA:** You'd want what
6 someone at the BellSouth office in the service office
7 has. You don't want what the guy is doing out in the
8 field. You just want the information that BellSouth
9 service reps have in the office.

10 **WITNESS GREEN:** Right. Shared with us
11 electronically so that we can utilize that information
12 for our systems. Because the thing we have to
13 remember here is that if I get something manually,
14 then I have a manual process to get it into my back
15 end systems, which drives some additional costs,
16 additional resources in our business, which obviously
17 will effect whatever cost we have to charge to the
18 customers.

19 So one of the means is electronic interface,
20 which we talk about through this whole thing, is
21 electronic access for provisioning, maintenance,
22 billing, ordering and preordering. And this is just
23 one capability under that overall guise.

24 **Q** And you want that notification to go to an
25 interface that's up and working, right? Is that the

1 way you characterized it, I believe, to Commissioner
2 Deason or Commissioner Garcia?

3 A I don't believe I did, because I don't have
4 any EDI up and operational today. But I expect to
5 have it up in the next three to four weeks. And in
6 any developments, when you want to make sure that you
7 have the business rules and the development
8 requirements in advance of conclusion of the interface
9 being turned up, such that when you turn the interface
10 up, all of that functionality is there. It makes no
11 sense to do it in a piece part.

12 Q I'll try to finish up quickly. Does LENS
13 have an electronic notification of service jeopardies?

14 A It absolutely does.

15 Q But MCI does not use LENS, correct?

16 A The answer to your question is yes. And the
17 only way that you are able to get service jeopardies
18 back through LENS is to issue your order through LENS.

19 Q Is there a national standard for electronic
20 service jeopardy notification?

21 A No, there is not. But neither is there a
22 standard for missed appointment jeopardies that were
23 included in EDI 7.0.

24 Q That's fine. What is the Change Control
25 Committee, Mr. Green?

1 A The Change Control Committee is a group of
2 CLECs who are doing business in the BellSouth region.
3 And the purpose for the change control process is to
4 make sure that everybody has a single place by which
5 to submit changes; not only CLECs, but BellSouth as
6 well.

7 Q Okay. And these are changes to the OSS
8 interfaces?

9 A Existing OSS interfaces, yes.

10 Q So this committee gets together and --
11 because you've got a lot of CLECs or ALECs wanting a
12 lot of different types of functions, right?

13 A Conceivably you may.

14 Q Okay. And this committee is just a good
15 place to funnel that. And does it also prioritize the
16 specific items that people are asking for, that ALECs
17 are asking for?

18 A That's one of the -- that is laid out in the
19 guise of Change Management. While we haven't stepped
20 through that prose to see, as what I term it, the car
21 really runs, that's been the template that has been
22 laid out Change Management.

23 Q And MCI is a member of that committee,
24 correct?

25 A Oh, yes, we are.

1 Q Okay. Is the issue of developing electronic
2 service jeopardies notifications before that
3 committee?

4 A No, it is not. And the reason that it is
5 not before that committee is because that request is
6 an age old request to BellSouth and has had no
7 movement on it whatsoever from BellSouth. So we've
8 always been in discussion for it. MCI did not see a
9 need to include it in the change management process,
10 because the change management process was designed
11 after we began those discussions.

12 But I will state for the record that of the
13 four things that were included in the changed
14 management meeting, three of them were brought up and
15 raised by MCI, and none of them were brought up or
16 raised by BellSouth themselves, which gives us the
17 impression that BellSouth does not intend to use this
18 change management process to introduce changes to
19 their interfaces.

20 Q Excuse me? I'm sorry. You're saying that
21 BellSouth is just pretending in this committee --

22 A I'm saying --

23 Q -- and it's not serious about it?

24 A I'm not saying that BellSouth isn't serious.
25 What I'm saying is it's our impression based on the

1 fact that BellSouth submitted no changes to the Change
2 Control Board for interface changes, not even those
3 that are mandated through a regulatory arena, such as
4 that that you mentioned for LENS, they have not
5 submitted that under this change management process,
6 which leads us to believe that BellSouth does not
7 intend to use this process for changes that they
8 initiate to their interface. They only intend to use
9 it, from our estimation, for changes that will be
10 initiated from CLECs.

11 Q Excuse me, Mr. Green, but if BellSouth has a
12 Commission order, whether it be from the Florida
13 Commission or Georgia Commission, that says "You're
14 violating a contract. You must do this to fix it,"
15 don't you think that takes precedence over what a CLEC
16 may be requesting?

17 A Absolutely. But that was discussed in the
18 Change Management Forum when it was being developed.
19 There's a spot on the Change Request Form to denote
20 the fact that it's a regulatory request and the
21 expectation is that absolutely it would take
22 precedence over all of those other things. But in
23 addition, the change management process is to notify
24 CLECs well in advance of any changes and to provide
25 the necessary documentation to all CLECs well in

1 advance of the change actually being made.

2 So prioritization is only one of the
3 functions that is a component of the change management
4 process. There are others.

5 Q Let me ask you this: Has MCI already made a
6 decision that the change control process isn't going
7 to work?

8 A MCI has reservations based on what we have
9 seen thus far, that there may be changes necessary for
10 the change management process. But we have committed
11 to giving it one passthrough to see how well the
12 process works and to determined whether or not it
13 needs to be tweaked or if issues need to be raised to
14 be addressed.

15 Q And that's mighty good of you.

16 A Thank you.

17 Q But MCI is the one that also is making
18 decisions on what changes it will bring to that
19 committee and what changes it won't. For example, the
20 service jeopardy notification change. Isn't that
21 correct?

22 A No.

23 Q Yeah.

24 A That's not correct.

25 Q Thank you. I have nothing further.

1 **CHAIRMAN JOHNSON:** Staff.

2 **CROSS EXAMINATION**

3 **BY MS. BEDELL:**

4 **Q** Good afternoon, Mr. Green.

5 **A** Good afternoon.

6 **Q** Relating to the OSS functions, are you
7 familiar with a Department of Justice document that
8 BellSouth published in the South Carolina 271
9 proceeding which described systems and databases that
10 BellSouth uses to support the OSS functions?

11 **A** I don't know if I've seen that document.
12 I'm going to say right now no, I'm not familiar with
13 that document.

14 **Q** Okay. Subject to check, if that document
15 describes 60 to 70 systems and several hundred
16 databases that BellSouth has, would that provide MCI
17 with sufficient information about their systems?

18 **A** The potential absolutely exists for it to.
19 Without having seen it, I can't answer definitively
20 but I suspect it would be a good start in that
21 direction.

22 **Q** And absent having descriptions of that sort,
23 which is our understanding is the kind of information
24 you are saying that MCI needs, but absent that, do you
25 think that BellSouth could prove parity through

1 performance measurements?

2 A They could prove parity through performance
3 measurements for some things. And let me give you
4 little more detail behind that.

5 With performance measurements they are
6 primarily from what I define as the performance behind
7 the interface.

8 After I get an order submitted to BellSouth,
9 then performance measurements will determine how well
10 BellSouth is handling those orders. Examples of
11 performance measurements would be firm order
12 confirmation timeliness, which is a measure that is
13 behind the interface. Provisioning time frame.
14 Missed appointments. Mean time to repair. A lot of
15 those things are captured under performance
16 measurements.

17 So performance measurements will measure
18 parity for how well BellSouth is providing service to
19 our customers through the provisioning of service.
20 Performance measurements do not address parity and OSS
21 systems with how or how long it takes for us to get an
22 order submitted to BellSouth because of nuances or
23 hurdles associated with the way they provide this
24 information.

25 Q Are you at all familiar with Mr. Stacy's

1 deposition?

2 **A** Yes.

3 **Q** In his deposition, it was page 30 -- I don't
4 know that you need to get to it, but it's Page 30
5 someone asked him what a SCHEMA is. And the answer
6 was it's a listing of the fields of the database, a
7 description of them and what the possible contents
8 are. It's roughly -- your question 4, a database
9 layout with the characteristics of the field.

10 In your opinion, would a SCHEMA such as that
11 provide MCI with the database layout information that
12 you have requested from BellSouth?

13 **A** We believe it would.

14 **Q** And once the EDI TCP/IP preordering
15 interface is developed and implemented, and if it is
16 integratable with the ordering interface EDI, would
17 you still need a download of the RSAG?

18 **A** Potentially we would not. If there was a
19 system integratable based on TCP/IP SSL 3, then I
20 could conceive of the fact that we would not need to
21 continue to get an RSAG download because we would have
22 access to it in an acceptable manner through this
23 preorder EDI TCP/IP interface. So over time I think
24 that that interface may replace the downloads that we
25 would get from BellSouth.

1 **MS. BEDELL:** That's all Staff's questions of
2 Mr. Green.

3 **CHAIRMAN JOHNSON:** Commissioners?

4 **COMMISSIONER CLARK:** Let me ask this one
5 question. You have gotten a download of the MSAG, is
6 that correct?

7 **WITNESS GREEN:** That's correct.

8 **COMMISSIONER CLARK:** How come you can't use
9 that?

10 **WITNESS GREEN:** For?

11 **COMMISSIONER CLARK:** Well, if it's the same
12 information that's in the RSAG, can't you use it?

13 **WITNESS GREEN:** We did an analysis on that.
14 And the MSAG data cannot be used for address
15 validation for a couple of reasons. One of all, the
16 address information may not identical. In other
17 words, in the MSAG it may say "street" and in the RSAG
18 it may say "ST", therefore, the order will be
19 rejected. Number one.

20 Number two, is the MSAG data provides a
21 range of available addresses. It doesn't give you a
22 specific address that is valid. In other words, you
23 may have a range of addresses that says 100 to 300
24 Main Street is a valid range, but 105 Main Street has
25 no physical address. It doesn't exist. So while you

1 may validate that as being valid in MSAG, it will not
2 be valid in RSAG, which again causes your order to
3 reject because you have an invalid address.

4 **COMMISSIONER CLARK:** Okay.

5 **CHAIRMAN JOHNSON:** Is that it?

6 **COMMISSIONER JACOBS:** A brief question.
7 When the agreement was developed, and earlier we
8 discussed a section that sets out the outline and
9 standards for your interfaces, and within there there
10 was several subsections of types of data that you
11 would acquire through these interfaces. As I
12 understand it -- what I'm getting at is the process
13 you went about, and it sounds like it was an evolving
14 process that you went about to actually identify the
15 specific means by which those interfaces would be
16 developed. And I guess I want to understand a little
17 bit more about that process from Point A to where you
18 are now. Sounds like -- I don't want to put words in
19 your mouth -- sounds like there was -- you kind of
20 looked at each segment of data, kind of piecemealed it
21 together and then kind of came to the conclusion later
22 on -- let me not do that. Let me have you explain to
23 me how you went about it.

24 **WITNESS GREEN:** Let me recap the question,
25 just to make sure that I have it all.

1 I think your question is how did we come to
2 decide that I wanted a download on the RSAG database.

3 COMMISSIONER JACOBS: Yeah.

4 WITNESS GREEN: Or some other functionality
5 relative to systems development.

6 What we did was in the development cycle
7 BellSouth tells you what functionalities they are
8 going to provide via what systems. And early on in
9 the process BellSouth said I have a number of systems
10 for ordering and I have a number of systems for
11 reordering. So what we did was we took a look at
12 those things and we evaluated from a functional
13 advantage point how easy would it be for us to utilize
14 that information, number one.

15 Number two, what effort do we have to go
16 through in order to acquire the information. And let
17 me focus on the address validation piece here because
18 I think it's easier.

19 Address validation was available from
20 BellSouth via two means. One was this I term as ICREF
21 because I can never remember what the acronym stands
22 for. So they provide address validation via ICREF and
23 they provided it via the LENS process. ICREF provided
24 only address validation. That was all that ICREF
25 would be used for. So when you start to look at it

1 being a national carrier, you have service reps
2 sitting in a service center somewhere, Dallas, New
3 York, wherever they are; they are having to deal with
4 multiple ILECs.

5 So the first thing is you don't want them to
6 be burdened by knowing all of the different ILEC
7 systems. So you tend to shy away from proprietary
8 drive that drive the need to have those unique systems
9 in your service center on your service rep's deck. So
10 you strive for integration of that information such
11 that they could all use a very similar interface that
12 is built by MCI and incorporate the necessary data
13 behind the scenes from the appropriate CLEC.

14 So when you start to look at ICREF I didn't
15 have any means of gathering address information from
16 ICREF through any other means than having the ICREF
17 terminal on my desk, pulling the information, either
18 cutting and pasting that information, printing it and
19 retyping it into my order. In effect it drives calls,
20 increases the -- or reduces the number of orders per
21 hour which is a productivity measure that we use in
22 our service centers.

23 LENS, on the other hand, while it provided
24 more functionality relative to preorder, drove me
25 through a number of those same issues. I had to sign

1 on. I had to have the LENS terminal on my desk.
2 People need to have user IDs. It logged you off after
3 every 30 minutes then; I think it's 60 minutes now.
4 And it had a number of flaws associated with it as
5 well. In addition to the fact that I couldn't take
6 the address information out of there and prepopulate
7 it into my system. I still had to print it or cut and
8 paste or type the information in, which subjected me
9 to increased costs, increase in resources and the
10 potential for excessive errors.

11 We went through that and said what's the
12 best means by which we can get that data, which is why
13 we need to know about the databases and the things
14 that BellSouth has available to it. Because it may be
15 as simple as saying just give us a download of that
16 database. We'll incorporate that into our own
17 systems, therefore, we won't be burdened by use of
18 your systems in our data center.

19 So that's the synopsis of kind of what the
20 processes are we use to determine what the best means
21 is to integrate systems for MCI.

22 **COMMISSIONER JACOBS:** Okay. Thank you.

23 **CHAIRMAN JOHNSON:** Mr. Melson.

24 **MR. MELSON:** No redirect. And I would move
25 Exhibit 6 and 7.

1 **CHAIRMAN JOHNSON:** Show 6 and 7 admitted
2 without objection.

3 (Exhibits 6 and 7 received in evidence.)

4 **MS. WHITE:** 8 is already in.

5 **CHAIRMAN JOHNSON:** I admitted 8 earlier.
6 Thank you, Mr. Green. You're excused.

7 (Witness Green excused.)

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9 (Transcript continues in sequence in
10 Volume 3.)

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