BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by ITC^DeltaCom   )DOCKET NO. 990750-TP
Communications, Inc. d/b/a ITC^DeltaCom)
for arbitration of certain unresolved)
issues in interconnection negotiations)
between ITC^DeltaCom and BellSouth   )
Telecommunications, Inc.   )
_____)
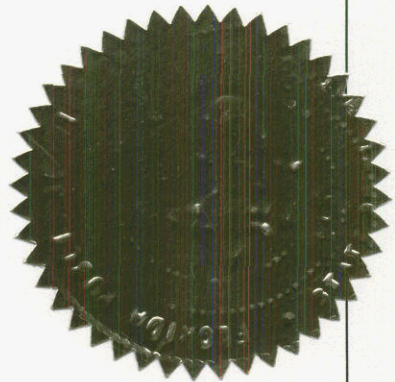
VOLUME 8

Pages 1065 through 1203

PROCEEDINGS:	HEARING
BEFORE:	COMMISSIONER SUSAN F. CLARK COMMISSIONER E. LEON JACOBS, JR.
DATE:	Friday, October 29, 1999
TIME:	Commenced at 9:00 a.m. Concluded at 12:50 p.m.
PLACE:	Betty Easley Conference Center Room 148 4075 Esplanade Way Tallahassee, Florida
REPORTED BY:	NANCY S. METZKE, RPR, CCR

APPEARANCES:

(As heretofore noted.)

1

2

I N D E X

3

WITNESSES

4

NAME   PAGE NO.

5

RONALD M. PATE

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EXHIBITS

NUMBER		ID.	ADMTD.
#27 RMP-1, 2 & 3	. . . . . .	1070	1203

1   P R O C E E D I N G S

2

3   COMMISSIONER CLARK: Call the hearing back to

4   order.

5   Is this Mr. Pate?

6   MR. GOGGIN: This is Mr. Pate.   Good morning,

7   Commissioners.

8

9

10   *   *   *   *

11

12   Whereupon,

13   RONALD M. PATE

14   was called as a witness by BellSouth and, after being

15   first duly sworn, was examined and testified as follows:

16   DIRECT EXAMINATION

17   BY MR. GOGGIN:

18   Q   Mr. Pate, would you please state your name and

19   address for the record?

20   A   Ronald M. Pate, 675 West Peachtree, Atlanta,

21   Georgia.

22   Q   By whom are you employed?

23   A   BellSouth Telecommunications.

24   Q   Have you previously caused to be prepared and

25   prefiled in this case direct testimony consisting of 28

1 pages?

2   A   Yes, I have.

3   Q   Do you have any substantive additions,

4 corrections, or changes to make to that testimony at this

5 time?

6   A   I do have one correction to make. If you'll

7 turn with me to Page 9, starting on Line 16, we're

8 changing what says, "The Service Order Entry System

9 (SONGS)" to read, "Direct Order Entry (DOE) System." So

10 the total sentence, starting on Page 15, would read: "For

11 business customers, BellSouth uses the address validation

12 screens in the Direct Order Entry (DOE) System.

13   Following that same logic, down on Line 19,

14 SONGS should be changed to read DOE, D-O-E. And then

15 that acronym also appears on the next page, Page 10, Line

16 2, where it says SONGS, that would change to read DOE,

17 D-O-E.

18   Those are my only corrections.

19   Q   If I were to ask you the same questions that

20 were posed in your prefiled direct testimony today, would

21 your answer to those questions be the same?

22   A   Yes, they would be.

23   Q   Have you prepared any exhibits associated with

24 your testimony?

25   A   Yes, I have.

1   Q   For the record, those exhibits were identified

2 in your testimony as Exhibit RMP-1 of two pages?

3   A   That's correct.

4   Q   And RMP-2 one page?

5   A   That's correct.

6   Q   And RMP-3 one page?

7   A   That is correct.

8   Q   Were these exhibits prepared by you or under

9 your supervision?

10   A   Yes, they were.

11   Q   Are there any substantive corrections or

12 changes to any of these exhibits?

13   A   No, there are not.

14   MR. GOGGIN: I'd like to have the exhibits

15   attached to Mr. Pate's testimony marked for

16   identification.

17   COMMISSIONER CLARK: They'll be marked as

18   Exhibit 27.

19 BY MR. GOGGIN (Continuing):

20   Q   Mr. Pate, have you previously caused to be

21 prepared and prefiled in this case rebuttal testimony

22 consisting of 19 pages?

23   A   Yes, I have.

24   Q   Do you have any substantive additions,

25 corrections or changes to make to that testimony?

1   A   No, I do not.

2   Q   If I were to ask you the same questions that

3 were posed in your prefiled rebuttal testimony today,

4 would your answers be the same?

5   A   Yes, they would.

6   MR. GOGGIN: Commissioner, I'd like to ask that

7 his testimony be inserted into the record as if

8 read.

9   COMMISSIONER CLARK: You would like his direct

10 testimony and his --

11   MR. GOGGIN: His direct testimony and his

12 rebuttal testimony to be admitted into the record as

13 if read.

14   COMMISSIONER CLARK: All right. And it is my

15 understanding, as revised, to show those portions

16 deleted that are no longer in issue, and I

17 understand the court reporter has those at this

18 time.

19   MR. GOGGIN: That's correct.

20   COMMISSIONER CLARK: All right. It will be

21 inserted in the record as though read, both the

22 direct and the rebuttal.

23

24

25

1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   DIRECT TESTIMONY OF RONALD M. PATE

3   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4   DOCKET NO. 990750-TP

5   August 16, 1999

6

7   Q.   PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH

8   TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

10   A.   My name is Ronald M. Pate. I am employed by BellSouth

11   Telecommunications, Inc. ("BellSouth") as a Director, Interconnection

12   Services. In this position, I handle certain issues related to local

13   interconnection matters, primarily operations support systems ("OSS").

14   My business address is 675 West Peachtree Street, Atlanta, Georgia

15   30375.

16

17   Q.   PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18

19   A.   I graduated from Georgia Institute of Technology in Atlanta, Georgia, in

20   1973, with a Bachelor of Science Degree. In 1984, I received a

21   Masters of Business Administration from Georgia State University. My

22   professional career spans over twenty-five years of general

23   management experience in operations, logistics management, human

24   resources, sales and marketing. I joined BellSouth in 1987, and have

25   held various positions of increasing responsibility.

1

2   Q.   HAVE YOU TESTIFIED PREVIOUSLY?

3

4   A.   Yes. I have testified before the Alabama, Florida, and Louisiana Public

5   Service Commissions.

6

7   Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?

8

9   A.   The purpose of my testimony is to provide BellSouth's position on

10   ITC^DeltaCom's Issue Nos. 2, subpart a and subpart c, ~~2(a)(i)~~, 2(g),

11   ~~3(i)~~, 3(m), and 6(a) raised by ITC^DeltaCom Communications, Inc.

12   ("ITC^DeltaCom") in its Petition for Arbitration filed with the Florida

13   Public Service Commission ("Commission") on June 11, 1999.

14

15   *Issue 3(b) [ITC^DeltaCom No. 2] Pursuant to the definition of parity,*

16   *should BellSouth be required to provide the following: (1) Operational*

17   *Support Systems ("OSS"), (2) UNEs, ~~(3) White Page Listings,~~ (4) Access*

18   *to Numbering Resources, (5) An Unbundled Loop using Integrated*

19   *Digital Loop Carrier (IDLC) Technology, ~~(6) Interconnection, (7) Service~~*

20   ~~*Intervals on winbacks, (8) Priority guidelines for repair and maintenance*~~

21   ~~*and UNE provisioning, and (9) White Page Listings to independent third-*~~

22   ~~*party publishers?*~~

23

24   Q.   WHICH PARTS OF THE ABOVE ISSUE ARE YOU ADDRESING?

25

2

1 A.   My testimony addresses sub-parts (1) ~~and (3).~~ Sub-parts (2), ~~(6), (7)~~

2   ~~and (9)~~ are addressed in the testimony of BellSouth Witness, Mr.

3   Alphonso Varner. Sub-parts (4), (5), ~~and (8)~~ are addressed in the

4   testimony of BellSouth witness, Mr. Keith Milner.

5

6 *Issue 3(b(1): [ITC^DeltaCom No. 2] Pursuant to the definition of parity,*

7 *should BellSouth be required to provide Operational Support Systems*

8 *("OSS")?*

9

10 Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12 A.   BellSouth currently provides the following nondiscriminatory electronic

13 interfaces to its Operational Support Systems ("OSS") for Alternative Local

14 Exchange Companies ("ALECs"): Local Exchange Navigation System

15 ("LENS") for pre-ordering, ordering, and provisioning for simple resale

16 services; Telecommunication Access Gateway ("TAG") for pre-ordering,

17 ordering, and provisioning for simple resale services and seven unbundled

18 network elements; Electronic Data Interexchange ("EDI") for ordering and

19 provisioning of simple resale services and seven unbundled network elements;

20 Trouble Analysis and Facilities Interface ("TAFI") for maintenance and repair;

21 Electronic Communications Trouble Administration ("ECTA") for maintenance

22 and repair; and Optional Daily Usage File ("ODUF"), Enhanced Optional Daily

23 Usage File ("EODUF"), and Access Optional Daily Usage File ("ADUF") for

24 billing. BellSouth also offers ALECs manual interfaces to its OSS. These

25 interfaces allow ALECs to perform the functions of pre-ordering, ordering,

1 provisioning, maintenance and repair, and billing for resale services in

2 substantially the same time and manner as BellSouth does for itself; and, in

3 the case of unbundled network elements, provide a reasonable competitor

4 with a meaningful opportunity to compete. BellSouth is not obligated to

5 provide ALECs with any additional OSS.

6

7 **Issue 3(b(3): [ITC^DeltaCom No. 2] Pursuant to the definition of parity,**

8 **should BellSouth be required to provide White Page Listings?**

9

10 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12 A. Pursuant to the Federal Communication Commission's ("FCC's") Rules,

13 BellSouth provides all ALECs with nondiscriminatory access to white

14 pages directory listings. In paragraph 253 of its Second Louisiana

15 Order in CC Docket 98-121 dated October 13, 1998, the FCC states

16 that "BellSouth has demonstrated that it is providing white pages

17 directory listings for customers of competitive LECs telephone services,

18 and thus has satisfied the requirements of checklist item (viii)."

19 BellSouth continues to comply with this requirement and, thus, this

20 Commission need not address this issue further.

21

22 **Issue 4 [ITC^DeltaCom No. 2(a)(i)] Should BellSouth be required to**

23 **provide the specifications to enable ITC^DeltaCom to parse the**

24 **Customer Service Records (CSR's)? If so, how?**

25

1 Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

2

3 A.   Because BellSouth already provides non-discriminatory access to its

4   OSS in a manner that allows ALECs to parse CSR's, BellSouth should

5   not be required by the interconnection agreement to provide this

6   information in another format.

7

8 Q.   WHAT IS BELLSOUTH'S UNDERSTANDING OF ITC^DELTACOM'S

9   POSITION ON THE PARSING FOR CSR'S?

10

11 A.   ITC^DeltaCom claims that it "must have the ability to 'parse' the CSR so

12   that it can flow this information into" its own OSS.

13

14 Q.   WHAT DOES "PARSE" MEAN?

15

16 A.   To parse is simply to break down the information contained in the CSR

17   into certain fields.

18

19 Q.   DOES BELLSOUTH ALREADY PROVIDE TO ITC^DELTACOM AND

20   OTHER ALECS CSR INFORMATION IN A MANNER THAT CAN BE

21   PARSED?

22

23 A.   Yes. On August 18, 1998, the national standard TAG pre-ordering

24   interface was implemented. TAG is a national standard machine-to-

25   machine interface that can be integrated with the TAG ordering

1 interface (available since November 1, 1998). More importantly, the

2 TAG interface can also be integrated with the EDI ordering interface

3 (available since December 31, 1996), which is the ordering interface

4 used by ITC^DeltaCom. The CSR data which is delivered to the ALEC

5 via TAG can be parsed by the ALEC to exactly the level needed on an

6 order, just as BellSouth parses CSR's in its own retail operations.

7

8 Q IF THE ALEC INTEGRATES THE TAG PRE-ORDERING INTERFACE

9   WITH ITS TAG OR EDI INTERFACE AND WITH ITS OSS, WILL THE

10   CSR INFORMATION OBTAINED VIA TAG "FLOW INTO" ITS OWN

11   OSS?

12

13 A. Yes, that is the purpose of integratable, machine-to-machine interfaces.

14   ALECs, such as ITC^DeltaCom, can integrate the TAG pre-ordering

15   interface with the TAG ordering interface or the EDI ordering interface.

16   ALECs can integrate these interfaces with their own internal OSS.

17   Integration allows ALECs to ability to manipulate the data obtained via

18   the TAG pre-ordering interface. This includes the ability to parse CSR.

19   The data can be manipulated so that it will "flow into" an ALEC's OSS.

20   This is apparently what ITC^DeltaCom desires to do.

21

22 Q. IS ITC^DELTACOM USING THE TAG INTERFACE?

23 A. No. Although ITC^DeltaCom expressed some interest in the TAG pre-

24   ordering interface by attending an orientation session in March 1998,

25   ITC^DeltaCom has informed BellSouth that it is not interested in

6

1   implementing the TAG pre-ordering interface. However, in an apparent

2   contradiction, ITC^DeltaCom states in Attachment 6, Paragraph 3.2 of

3   its draft interconnection agreement that it wants BellSouth to make TAG

4   available as a pre-ordering interface.

5

6 Q. WHAT DOES ITC^DELTACOM USE FOR PRE-ORDERING AND

7   ORDERING?

8

9 A. ITC^DeltaCom currently uses the human-to-machine LENS interface for

10   pre-ordering and the machine-to-machine EDI interface for ordering.

11

12 Q. WHY IS ITC^DELTACOM RAISING AN ISSUE REGARDING A

13   SPECIFICATION FOR PARSING THE CSR?

14

15 A. BellSouth can only speculate that because ITC^DeltaCom has declined

16   to use the TAG pre-ordering interface, but instead has requested a

17   specification for parsing the CSR, ITC^DeltaCom wants another type of

18   pre-ordering interface. If that is what ITC^DeltaCom wants, it should

19   negotiate directly with BellSouth for it rather than couching the issue in

20   terms of parsing of CSR's.

21

22 **Issue 5 [ITC^DeltaCom No. 2(a)(i)] Should BellSouth be required to**

23 **provide a download of the Regional Street Address Guide (RSAG)? If so**

24 **how?**

25

1   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE.

2

3   A.   BellSouth has made a proposal to ITC^DeltaCom to provide a

4   download of RSAG at rates and conditions to be negotiated.

5

6   Q   WHAT IS BELLSOUTH'S UNDERSTANDING OF ITC^DELTACOM'S

7   POSITION ON THE REGIONAL STREET ADDRESS GUIDE

8   ("RSAG")?

9

10   A.   In its Petition, ITC^DeltaCom simply claims that a download of the

11   RSAG database will increase its efficiency and accuracy.

12

13   Q.   WHAT DOES ITC^DELTACOM PROPOSE ABOUT AN RSAG

14   DOWNLOAD IN ITS DRAFT INTERCONNECTION AGREEMENT?

15

16   A.   ITC^DeltaCom states in Attachment 6, Paragraph 4.8.3 of the draft

17   interconnection agreement that BellSouth should be required to provide

18   "[a] subset of the Regional Street Address Guide ("RSAG"), as

19   determined by ITC^DeltaCom, transmitted electronically on a daily

20   basis, which includes street addresses and the associated serving

21   switches, enabling ITC^DeltaCom to map a customer address to a

22   specific serving switch."

23

24   ITC^DeltaCom, in other words, wants a download of RSAG in order to

25   validate end user customers' addresses.

8

1

2　Q.　WHAT IS THE RSAG?

3

4　A.　RSAG is a database containing information that can be used to perform

5　　　address validations. BellSouth provides to ALECs, including

6　　　ITC^DeltaCom, access to the RSAG database on a real time basis

7　　　through the LENS and the TAG pre-ordering interfaces. Since the

8　　　RSAG database is updated nightly, this means ALECs do have real-

9　　　time access via these interfaces to an up-to-date database.

10

11　Q.　HOW DOES BELLSOUTH PERFORM ADDRESS VALIDATION FOR

12　　　ITS RETAIL CUSTOMERS?

13

14　A.　For residence customers, BellSouth validates addresses using the

15　　　Regional Negotiation System ("RNS"). For business customers,
　　　　　　　　　　　　　　　　　　　　　　　Direct order

16　　　BellSouth uses the address validation screens in the ~~Service Order~~
　　　Entry (DOE) System,

17　　　~~Negotiation System ("SONGS")~~. The BellSouth service representative

18　　　sends an inquiry to and receives a response from the RSAG via RNS

19　　　and ~~SONGS~~. (DOE)

20

21　Q.　HOW DO ALECS PERFORM ADDRESS VALIDATION?

22

23　A.　ALECs can and do perform the address validation function by using

24　　　LENS or TAG. Using either of these interfaces, the ALEC

25　　　representative sends an inquiry to and receives a response from the

1   same RSAG database that BellSouth accesses by using RNS and

2   ~~SONGS~~ DOE The RSAG database returns address information without

3   regard to whether the request originated from an ALEC or from

4   BellSouth.

5

6   Q   IF THE ALEC INTEGRATES THE TAG PRE-ORDERING INTERFACE

7   WITH ITS TAG ORDERING OR EDI ORDERING INTERFACE, WILL

8   THE INFORMATION OBTAINED FROM RSAG VIA TAG "FLOW" INTO

9   THE ORDERING INTERFACE EFFICIENTLY AND ACCURATELY?

10

11 A. Yes, that is the purpose of integratable, machine-to-machine interfaces.

12

13 Q. WHAT SEEMS TO BE THE PURPOSE OF ITC^DELTACOM'S

14   DESIRE TO HAVE BELLSOUTH REQUIRED TO PROVIDE A

15   DOWNLOAD OF THE DATABASE?

16

17 A. BellSouth does not understand ITC^DeltaCom's position on this issue.

18   ITC^DeltaCom has not explained why real-time access via an electronic

19   interface is not acceptable.   Throughout the Petition and the draft

20   interconnection agreement, ITC^DeltaCom stresses the importance of

21   an electronic interface for pre-ordering for real-time access to

22   BellSouth's OSS. Yet, by requesting a download of RSAG,

23   ITC^DeltaCom apparently wants a less efficient means of data access.

24   Further, BellSouth suspects that ITC^DeltaCom also wants to get the

25   download of RSAG for free. The language in ITC^DeltaCom's Petition

10

1 and draft agreement does not mention anything about payment for a

2 daily download of this database.

3

4 *Issue 22 [ITC^DeltaCom No. 2(g)] How should "order flow through" be*

5 *defined?*

6

7 Q. WHAT IS BELLSOUTH'S POSITION ON ISSUE 2(g)?

8

9 A. BellSouth does not believe that it is necessary for the interconnection

10 agreement to contain a definition of "flow through," nor does BellSouth

11 agree with ITC^DeltaCom's proposed definition.

12

13 Q. HOW DOES ITC^DELTACOM DEFINE FLOW THROUGH?

14

15 A. In its Petition, ITC^DeltaCom states that "[f]low through should be

16 defined to include end-to-end preordering and ordering processes."

17

18 Q. HOW DOES ITC^DELTACOM DEFINE FLOW THROUGH IN ITS

19 DRAFT OF THE INTERCONNECTION AGREEMENT?

20

21 A. ITC^DeltaCom's definition in its draft agreement is much more detailed

22 than its stated position in the Petition. In Attachment 6, Paragraph

23 4.7.1, ITC^DeltaCom states: "'Flow Through' is defined as an end-to-

24 end pre-ordering and ordering process, (including legacy BellSouth

25 applications) without manual intervention. Specifically, Flow Through,

11

1 *includes electronic reporting of order status, electronic reporting of*

2 *errors and electronic notification of critical events such as 'jeopardy*

3 *notification' and rescheduled due dates. BellSouth shall provide Flow*

4 *Through of electronic processes in a manner consistent with industry*

5 *standards and, at a minimum, at a level of quality equivalent to itself or*

6 *to any ALEC with comparable systems."*

7

8 Q. DOES BELLSOUTH AGREE WITH ITC^DELTACOM'S DEFINITION IN

9   ITS PETITION OR IN IT'S DRAFT INTERCONNECTION

10   AGREEMENT?

11

12 A. No. ITC^DeltaCom's uses the term "flow through" in a completely

13   different and contradictory manner than it is commonly used by

14   BellSouth and by the Federal Communications Commissions ("FCC").

15

16 Q. HOW DOES THE FCC DEFINE "FLOW THROUGH"?

17

18 A. *In paragraph 107 of its Second Louisiana Order in CC Docket No. 98-*

19   *121 dated October 13 1998, the FCC states that "a competing carrier's*

20   *orders 'flow through' if they are transmitted electronically through the*

21   *gateway and accepted into BellSouth's back office order systems*

22   *without manual intervention."*

23

24 Q. HOW DOES BELLSOUTH DEFINE "FLOW THROUGH"?

25

1 A. Based upon the FCC's definition, BellSouth contends that a service

2   request flows through an electronic order system only when an ALEC or

3   BellSouth representative takes *information directly from an end user*

4   customer, inputs it directly into an electronic order interface without

5   making any changes or manipulating the customer's information, and

6   sends the complete and correct request downstream for mechanized

7   order generation.

8

9   Flow through for an ALEC Local Service Request (LSR) "starts" when

10   the complete and correct electronically-submitted LSR is sent via one of

11   *the ALEC ordering interfaces (EDI, TAG, or LENS)*, flows through the

12   mechanical edit checking and local exchange service order generation

13   ("LESOG") system, is mechanically transformed into a service order by

14   LESOG, and is accepted by the Service Order Control System

15   ("SOCS") without any human intervention. Pre-ordering is not part of

16   this particular process, nor is electronic notification of order status and

17   jeopardies.

18

19 Q. HOW DOES BELLSOUTH CALCULATE AND REPORT FLOW

20   THROUGH?

21 A. The mathematical derivation of the flow through rate is reflected

22   monthly in the Percent Flow Through Service Requests report which is

23   already part of BellSouth's Service Quality Measurements ("SQM").

24   This report is published on BellSouth's Performance Measurements

25   Web site. Exhibit RMP-1 is an excerpt of the report for the month of

13

1   January 1999. The column labeled "ALEC Error Excluded Calculation"

2   provides the flow through rate. Looking at the report one can see that

3   the flow through rate for January 1999 was 89.89%.

4   The process for determining the "ALEC Error Excluded Calculation"

5   flow through is depicted in the BellSouth chart entitled: "ALEC Ordering

6   Process Flow," which is attached as page 2 of Exhibit RMP-1. In

7   summary, the calculation for the "ALEC Error Excluded Calculation"

8   flow through is:

Issued Service Orders

Total Mechanized LSRs – (Total Manual Fallout+Auto

Clarifications+ALECcaused Errors)

9   Using the January 1999 flow through report for the purpose of

10 illustration, the calculation is as follows:

$$\frac{48,397}{74,640-(8,742+5,485+6,574)} = 89.89\%$$

11 These same numbers from the January 1999 Flow Through Report are

12 used on page 2 of Exhibit RMP-1 to illustrate the derivation of flow

13 through.

14 This methodology for calculating flow through is in strict compliance

15 with the concept as defined above by the FCC.

16

1 Q. WHAT SEEMS TO BE THE PURPOSE OF THIS ISSUE AND OF

2 PARAGRAPHS 4.7.1 AND 4.7.2 OF THE DRAFT AGREEMENT?

3

4 A. BellSouth can only speculate that ITC^DeltaCom is attempting to have

5 this Commission require BellSouth to provide complete electronic pre-

6 ordering, ordering, and provisioning of all UNEs and resale services. If

7 indeed this is ITC^DeltaCom's position, it is inappropriate because even

8 BellSouth does not have that capability for itself. BellSouth is only

9 obligated to provide pre-ordering and ordering services in substantially

10 the same time and manner as BellSouth does for itself. What

11 ITC^DeltaCom is seeking far exceeds BellSouth's obligation under the

12 law. Clearly, the Commission should reject ITC^DeltaCom's misguided

13 efforts with respect to this issue.

14

15 Q. PLEASE COMMENT ON ITC^DELTACOM'S PARAGRAPH 4.7.2 OF

16 ATTACHMENT 6?

17

18 A. BellSouth does not understand what ITC^DeltaCom means when it

19 states in Paragraph 4.7.2 that "BellSouth shall provide parity of

20 application functionality and not simply 'access' to BellSouth's systems."

21 The 1996 Telecommunications Act at Section 251(c)(3) only requires

22 that BellSouth provide nondiscriminatory access to network elements,

23 which BellSouth has done via the nondiscriminatory interfaces it has

24 offered to ALECs. BellSouth provides access to the ALECs in

25 substantially the same time and manner as it does for itself.

15

1

2   BellSouth also does not agree with the rest of Paragraph 4.7.2, which

3   states that : "Capability shall be provided to process large orders, UNE

4   orders, and complex orders in a manner at parity to that afforded by

5   BellSouth to itself, its Affiliates, or any other Telecommunications

6   Carrier." First, as described by Mr. Al Varner in his testimony about

7   Issue 2, BellSouth does not use UNEs for itself. Second, large orders

8   and orders for complex services are handled manually for ALECs in

9   substantially the same time and manner as they are handled manually

10   for BellSouth customers.

11

12 Q. PLEASE DESCRIBE HOW BELLSOUTH SERVICE REQUESTS ARE

13   MANUALLY HANDLED FOR BELLSOUTH AND ALECS.

14

15 A. Before engaging in comparisons, it is important to note that non-

16   discriminatory access does not require that all information and functions

17   for ALECs must be electronic and involve no manual handling. Many

18   services, primarily complex services, involve substantial manual

19   handling by BellSouth account teams for BellSouth's own retail

20   customers. Thus, non-discriminatory access to certain functions for

21   ALECs also legitimately may involve manual processes for these same

22   functions.

23   The manual processes that BellSouth uses for complex resold services

24   offered to the ALECs are accomplished in substantially the same time

25   and manner as the processes used for BellSouth's complex retail

16

1 services. These processes are in compliance with the Act and the

2 FCC's rules. The specialized and complicated nature of complex

3 services, together with their relatively low volume of orders as

4 compared to basic exchange services, renders them less suitable for

5 mechanization, whether for retail or resale applications. Complex,

6 variable processes are difficult to mechanize, and BellSouth has

7 concluded that mechanizing many lower-volume complex retail services

8 would be imprudent for its own retail operations, in that the benefits of

9 mechanization would not justify the cost. Since the same manual

10 processes are in place for both ALEC and BellSouth retail orders, the

11 processes are competitively neutral, which is exactly what both the Act

12 and the FCC require.

13

14 There are two types of complex services: "Non-designed" and

15 "Designed." A "Non-designed" service is a class of service with a

16 Universal Service Order Code ("USOC") that does not require special

17 provisioning and is served by one central office or wire center. A

18 "Designed" service involves special engineering and provisioning.

19

20 An example of a "Designed" complex service for which retail handling is

21 not fully mechanized is Multiserv® service. This is a complex service

22 available to both BellSouth's retail customers and to resellers. In both

23 cases, the pre-ordering and ordering processes are largely manual.

24 Nonetheless, these manual pre-ordering and ordering processes are

25 substantially the same for both BellSouth retail and ALEC orders.

17

1 Orders for retail services are handled primarily by the appropriate

2 business unit for retail services -- BellSouth Business Systems ("BBS")

3 account teams. Orders for ALEC services are handled by the

4 appropriate business unit for ALEC services -- ALEC account teams

5 that are part of BellSouth's Interconnection Services ("ICS"). ICS's

6 account team's handling of complex services for ALECs is substantially

7 the same as BBS's account team's handling of complex services for

8 BellSouth's retail customers; they both use substantially the same

9 processes as described below.

10

11 Attached to my testimony is Exhibit RMP-2, which depicts the flow of

12 the process for ordering MultiServ® by ALECs and Exhibit RMP-3,

13 which depicts the flow of the process for ordering MultiServ® by

14 BellSouth's retail unit. To perform the pre-ordering activity for complex

15 services, which is known as a "service inquiry", a systems designer on

16 the appropriate BBS or ICS account team fills out an extensive paper

17 form and then provides that form to the project manager for further

18 manual activities. On approval of either the retail customer or the

19 ALEC, as appropriate, the paper service inquiry is re-initiated as a firm

20 order, which also is an extensive paper form with subsequent manual

21 distribution. In both the retail and the resale cases, the Firm Order

22 Package is manually handed off to the service center, where paper

23 service order worksheets are created to assist in initiating service

24 orders in the ordering system. At that point, orders are typed into the

25 appropriate service order system for the customer's location, either the

1 Direct Order Entry ("DOE") system (in North Carolina, South Carolina,

2 Georgia, and Florida) or the SONGS (in Alabama, Kentucky, Louisiana,

3 Mississippi, and Tennessee). This order entry is the same for both the

4 retail and the resale situations, and thus, does not result in a different

5 customer "experience" in either case. The person who enters the

6 complex order in BellSouth's systems never has any contact with the

7 end-user customer, whether the customer belongs to an ALEC or

8 BellSouth. After the service order is input, the account team and

9 project managers are notified by e-mail of the service order numbers

10 and due dates. The account team manually reviews the service order

11 for accuracy and follows up as necessary. These processes, with their

12 substantial reliance on manual handling and paper forms, are common

13 to both retail and ALEC orders. Thus, BellSouth provides to ALECs the

14 ability to order complex services in substantially the same time and

15 manner as it provides to its retail customers.

16

17 *Issue 25 [ITC^DeltaCom No. 3(b)] Should ITC^DeltaCom and BellSouth*

18 *be required to follow the ATIS/OBF business rules?*

19

20 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

21

22 A. It is BellSouth's understanding that this issue has been resolved by the

23 parties; however, BellSouth reserves the right to file testimony on this

24 issue, should it be further disputed.

25

1 *Issue 26 [ITC^DeltaCom No. 3(d)] Should BellSouth be required to*

2 *provide ITC^DeltaCom access to Universal Service Order Codes*

3 *(USOCs), Field Identifiers (FIDs) and other information necessary to*

4 *process orders in a downloadable format?*

5

6 Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

7

8 A.   It is BellSouth's understanding that this issue has been resolved by the

9   parties; however, BellSouth reserves the right to file testimony on this

10   issue, should it be further disputed.

11

12 *Issue 27 [ITC^DeltaCom No. 3(f)] Should BellSouth be required to*

13 *maintain both the current and the next previous version of an electronic*

14 *interface?*

15

16 Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

17

18 A.   It is BellSouth's understanding that this issue has been resolved by the

19   parties; however, BellSouth reserves the right to file testimony on this

20   issue, should it be further disputed.

21

22 *Issue 28 [ITC^DeltaCom No. 3(g)] Should ITC^DeltaCom have at least 90*

23 *days advance notice prior to BellSouth discontinuing an interface?*

24

1 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

2

3 A. It is BellSouth's understanding that this issue has been resolved by the

4   parties; however, BellSouth reserves the right to file testimony on this

5   issue, should it be further disputed.

6

7 *Issue 30 [ITC^DeltaCom No. 3(i)] Should BellSouth be required to*

8 *maintain UNE/LCSC hours from 6 a.m. – 9 p.m.?*

9

10 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12 A. BellSouth should not be required to change its hours for the Unbundled

13   Network Elements Center ("UNEC" or "UNE Center") or for the Local

14   Carrier Service Center ("LCSC"), because the hours BellSouth currently

15   offers are more than adequate to meet the needs of all ALECS. The

16   hours offered by BellSouth are based on demand and costs. BellSouth

17   monitors workloads at the UNEC and LCSC, and is aware of the most

18   popular times of the day for LSRs to arrive.

19

20 Q. WHEN IS THE UNEC OPEN?

21

22 A. There are two locations of the UNEC: Tucker, Georgia and

23   Birmingham, Alabama. The UNEC is open for the provisioning of

24   designed functions Monday through Friday from 8:00 a.m. to 5:00 p.m.

25   local time. The UNEC is open for the provisioning of non-designed

21

1   functions Monday through Saturday from 8:00 a.m. to 5:00 p.m. local

2   time. Other hours may be arranged with ALECs on a case-by-case

3   basis for an additional fee. In addition, the UNEC provides

4   maintenance support 24 hours a day, 7 days a week.

5

6   Q.   WHEN IS THE LCSC OPEN?

7

8   A.   There are two locations of the LCSC: Atlanta, Georgia and Birmingham,

9   Alabama. The hours for the LCSC are currently 24 hours a day, 7 days

10   a week, however, these hours soon will be changed to Monday through

11   Saturday from 6:00 a.m. to midnight eastern time. The change is being

12   made so that the hours will be equivalent with BellSouth's retail hours.

13   Additionally, most of BellSouth's systems are down after midnight for

14   maintenance and updates.

15

16   *Issue 31 [ITC^DeltaCom No. 3(j)] Should BellSouth be required to*

17   *provide a toll free number to ITC^DeltaCom to answer questions*

18   *concerning BellSouth's OSS proprietary interfaces from 8 a.m. to 8 p.m.?*

19

20   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

21

22   A.   It is BellSouth's understanding that this issue has been resolved by the

23   parties; however, BellSouth reserves the right to file testimony on this

24   issue, should it be further disputed.

25

1 *Issue 32 [ITC^DeltaCom No. 3(k)] What information should be included in*

2 *the Firm Order Confirmation (FOC)?*

3

4 Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

5

6 A.   It is BellSouth's understanding that this issue has been resolved by the

7   parties; however, BellSouth reserves the right to file testimony on this

8   issue, should it be further disputed.

9

10 *Issue 34 [ITC^DeltaCom No. 3(m)] What type of repair information should*

11 *BellSouth be required to provide to ITC^DeltaCom such that*

12 *ITC^DeltaCom can keep the customer informed?*

13

14 Q.   HOW DOES ITC^DELTACOM STATE ITS POSITION ON THIS ISSUE

15   IN ITS PETITION?

16

17 A.   ITC^DeltaCom states that : "BellSouth should be required to provide all

18   information needed to allow ITC^DeltaCom to enter a customer trouble

19   ticket into the BellSouth system, retrieve and track current status on all

20   ITC^DeltaCom trouble and repair tickets, receive an estimated time to

21   repair on a real-time basis, and other related repair functions in

22   Attachment 6, Sections 5.3 through 5.3.2."

23

24 Q.   PLEASE COMMENT ON ITC^DELTACOM'S POSITION.

25

1   A.   First, BellSouth does not understand what ITC^DeltaCom means when

2   it states that "BellSouth should be required to provide all information

3   needed to allow ITC^DeltaCom to enter a customer trouble ticket into

4   the BellSouth system." Although BellSouth offers nondiscriminatory

5   electronic interfaces for ALECs to use to enter trouble information into

6   BellSouth maintenance and repair OSS, it is certainly ITC^DeltaCom's

7   responsibility to gather this trouble information from its end user

8   customers to enter into the interface, not BellSouth's.

9

10   Second, BellSouth is unsure of ITC^DeltaCom's actual position on this

11   issue. ITC^DeltaCom's statement of its position in the Petition is

12   different than the language which ITC^DeltaCom has proposed in

13   Attachment 6 of its draft interconnection agreement.

14

15   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

16

17   A.   BellSouth's position is that it provides ITC^DeltaCom and the other

18   ALECs with non-discriminatory access to its maintenance and repair

19   OSS by providing TAFI and the ECTA Gateway. Among other things,

20   these interfaces allow ITC^DeltaCom and other ALECs to enter

21   customer trouble tickets into the BellSouth system, retrieve and track

22   current status on all ITC^DeltaCom trouble and repair tickets, and

23   receive an estimated time to repair on a real-time basis. BellSouth also

24   offers manual interfaces to its maintenance and repair OSS. Once it

25   has been determined that a trouble requires a dispatch, no distinction is

1   made in priority between tickets related to ALEC customers versus

2   tickets related to BellSouth retail customers.

3

4   Q. PLEASE DESCRIBE THE TAFI INTERFACE.

5

6   A. ALEC TAFI is the same maintenance and trouble repair system used by

7   BellSouth's own retail representatives for non-designed services,

8   except that it combines functionality for both residential and business

9   services, while BellSouth must use separate TAFI interfaces for its

10   residential and business retail units. TAFI is a user-friendly human-to-

11   machine interface that often enables trouble reports to be cleared

12   remotely by the repair attendant handling the initial customer contact,

13   frequently with the customer still on the line. This is possible because

14   TAFI correctly screens 80% of the reports for non-designed services

15   while the customer is on the line. BellSouth and ALECs can use TAFI

16   to check the status of repair tickets and to view end user customer's

17   maintenance histories.

18

19   Although TAFI is not a national standard interface, BellSouth made

20   TAFI available to ALECs so that they would have nondiscriminatory

21   access since BellSouth also uses TAFI. The national standard for

22   repair and maintenance interfaces addresses only functions such as

23   electronically opening a trouble ticket or obtaining status information.

24

25 Q. DOES ITC^DELTACOM USE TAFI?

25

1

2   A.   Yes.

3

4   Q.   DOES BELLSOUTH ALSO OFFER A NATIONAL STANDARD

5   ELECTRONIC INTERFACE FOR MAINTENANCE AND REPAIR?

6

7   A.   Yes. BellSouth has provided ALECs with ECTA. ECTA uses the

8   T1/M1 national standard for local exchange trouble reporting and

9   notification. This machine-to-machine interface provides access to the

10   BellSouth's maintenance OSS supporting both telephone-number and

11   circuit-identified services - i.e., designed and non-designed services. It

12   supports both resold services and UNEs. Because it follows the

13   national standard for local exchange trouble reporting and notification,

14   the following functions are available to users of ECTA: the ability to

15   enter a report; the ability to modify a report; the ability to obtain status

16   information during the life of the report; and the ability to cancel a

17   report.

18

19   Q.   DOES BELLSOUTH PROVIDE THE REPAIR INFORMATION

20   REQUIRED TO ENABLE ITC^DELTACOM TO KEEP THEIR

21   CUSTOMER INFORMED?

22

23   A.   Yes. As I've shown above, BellSouth provides ITC^DeltaCom with non-

24   discriminatory access to its maintenance and repair OSS by providing

25   TAFI and ECTA Gateway. Among other things, these interfaces allow

1   ALECs to enter customer trouble tickets into the BellSouth system,

2   retrieve and track current status on all trouble and repair tickets, and

3   receive an estimated time to repair on a real-time basis.

4

5   *Issue 38 [ITC^DeltaCom No. 6(a)] What charges, if any, should BellSouth*

6   *be permitted to impose on ITC^DeltaCom for BellSouth's OSS?*

7

8   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

9

10   A.   It is BellSouth's position that it may recover its costs for its OSS from

11   ITC^DeltaCom and the other ALECs. The details of BellSouth's

12   position are provided by Mr. Al Varner in his direct testimony. I,

13   however, address ITC^DeltaCom's statement in its position that

14   "BellSouth's systems do not currently provide resold services or

15   unbundled network elements in a nondiscriminatory manner."

16

17   Q.   DO YOU DISAGREE WITH ITC^DELTACOM'S STATEMENT ABOUT

18   THE ELECTRONIC INTERFACES TO BELLSOUTH'S OSS?

19   A.   BellSouth does not agrees with ITC^DeltaCom's statement. As

20   previously stated, BellSouth currently provides the following

21   nondiscriminatory electronic interfaces to its OSS for ALECs: LENS for

22   pre-ordering, ordering, and provisioning for simple resale services; TAG

23   for pre-ordering, ordering, and provisioning for simple resale services

24   and seven unbundled network elements; EDI for ordering and

25   provisioning of simple resale services and seven unbundled network

1   elements; TAFI for maintenance and repair; ECTA for maintenance and

2   repair; and ODUF, EODUF, and ADUF for billing. BellSouth also offers

3   ALECs manual interfaces to its OSS. These interfaces allow ALECs to

4   perform the functions of pre-ordering, ordering, provisioning,

5   maintenance and repair, and billing for UNEs and resold services in

6   substantially the same time and manner as BellSouth does for itself.

7

8   Q.   DOES THIS CONCLUDE YOUR TESTIMONY?

9

10   A.   Yes.

1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   REBUTTAL TESTIMONY OF RONALD M. PATE

3   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4   DOCKET NO. 990750-TP

5   SEPTEMBER 13, 1999

6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH

8   TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

10 A. My name is Ronald M. Pate. I am employed by BellSouth

11   Telecommunications, Inc. ("BellSouth") as a Director, Interconnection

12   Services. In this position, I handle certain issues related to local

13   interconnection matters, primarily operations support systems ("OSS").

14   My business address is 675 West Peachtree Street, Atlanta, Georgia

15   30375.

16

17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18

19 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in

20   1973, with a Bachelor of Science Degree. In 1984, I received a

21   Masters of Business Administration from Georgia State University. My

22   professional career spans over twenty-five years of general

23   management experience in operations, logistics management, human

24   resources, sales and marketing. I joined BellSouth in 1987, and have

25   held various positions of increasing responsibility.

1

1

2 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

3

4 A. Yes. I filed direct testimony on August 16, 1999.

5

6 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

7

8 A. The purpose of my testimony is to rebut the direct testimony of

9   ITC^DeltaCom witnesses: Mr. Michael Thomas, Mr. Thomas Hyde,

10   Mr. Christopher J. Rozycki and Mr. Don J. Wood.

11

12 Q. MR. THOMAS (PAGES 3-5) AND MR. WOOD (PAGES 12-13)

13   ALLEGE THAT BELLSOUTH IS NOT PROVIDING

14   NONDISCRIMINATORY ACCESS TO ITS OSS SYSTEMS AND

15   DATABASES. PLEASE COMMENT.

16

17 A. As I described in my direct testimony, BellSouth provides

18   nondiscriminatory electronic interfaces to its Operations Support

19   Systems ("OSS") for Alternative Local Exchange Companies ("ALECs").

20   The interfaces provided by BellSouth allow ALECs to perform functions

21   of pre-ordering, ordering, provisioning, maintenance and repair, and

22   billing for resale services in substantially the same time and manner as

23   BellSouth does for itself; and, in the case of unbundled network

24   elements, provide a reasonable competitor with a meaningful

2

1   opportunity to compete. BellSouth is not obligated to provide ALECs

2   with any additional access to its OSS.

3

4   Q.   ON PAGE 13 OF HIS TESTIMONY, MR. ROZYCKI STATES THAT

5   "BELLSOUTH'S OSS CURRENTLY DOES NOT WORK". MR. WOOD

6   STATES ON PAGE 9 THAT "THE EXISTING OSS EMPLOYED BY

7   BELLSOUTH IS NOT WORKABLE." DO YOU AGREE?

8

9   A.   No. If the electronic interfaces to BellSouth's OSS did not work, then

10   ALECs would not use them. Supporting data reflects their use and

11   continued growth. As a point of reference, in August 1998, a total of

12   159,543 local service requests (LSRs) were processed by BellSouth.

13   From that total, 118,257 (74.1%) were submitted manually and 41,286

14   (25.9%) were submitted electronically. By contrast, in July 1999, the

15   total submission of LSRs grew by 23% to 196,608. In conjunction with

16   experiencing tremendous growth, the LSR submissions have shifted to

17   51.5% (101,234 LSRs) submitted manually and 48.5% (95,374 LSRs)

18   submitted electronically. Of particular note is the growth in submissions

19   using the Electronic Data Interchange ("EDI") ordering interface which

20   is the interface of choice for ITC^DeltaCom. In August 1998, BellSouth

21   processed 8,659 LSRs received via EDI. Over the past 6 months

22   (February 1999-July 1999), CLECS submitted monthly on average

23   18,046 LSRs in EDI. This average represents a 108% increase. In

24   addition, the combined flow through rate for the electronic interfaces

25   was 90.1% for July 1999. The facts speak for themselves. The

1 electronic interfaces to BellSouth's OSS work and the ALEC community

2 as a whole have found their deployment to be effective.

3

4 Q. IS BELLSOUTH REQUIRED TO PERFORM THE INTERGRATION OF

5 INTERFACES FOR ALECS?

6

7 A. No. Contrary to the implication in the testimony of Mr. Thomas (pages

8 3-4), the Federal Communications Commission ("FCC") has not

9 ordered BellSouth to integrate pre-ordering and ordering interfaces.

10 There is no requirement in the Telecommunications Act of 1996 or in

11 any order by the FCC that makes BellSouth responsible for performing

12 the "integration" of pre-ordering [Local Exchange Navigation System

13 ("LENS") and Telecommunication Access Gateway ("TAG")], ordering

14 (LENS, TAG and EDI), with the ALECs' own OSS systems. BellSouth

15 provides integratable, national standard, machine-to-machine interfaces

16 for pre-ordering and ordering that ALECs, including ITC^DeltaCom,

17 may integrate with their own internal OSS. Integration is the

18 responsibility of the ALEC. This allows ALECs to tailor the interfaces

19 and the information received via the interfaces in the best manner

20 possible to suit their own individual business needs.

21

22 Q. MR. ROZYCKI (PAGE 10) STATES THAT "BELLSOUTH'S

23 OPERATIONS SUPPORT SYSTEMS ("OSS") CURRENTLY FALL FAR

24 SHORT OF PROVIDING A COMPETITIVE ALTERNATIVE TO

25 BELLSOUTH'S OWN INTERNAL SYSTEMS". MR. ROZYCKI

1 FURTHER CLAIMS (PAGE 13) THAT DELTACOM SHOULD NOT BE

2 REQUIRED TO PAY FOR OSS BECAUSE ITC^DELTACOM "DID NOT

3 REQUEST A SEPARATE SYSTEM BE CONSTRUCTED FOR IT.

4 ITC^DELTACOM CONSIDERS IT ACCEPTABLE TO HAVE DIRECT

5 ACCESS INTO BELLSOUTH'S EXISITING OPERATIONAL SUPPORT

6 SYSTEMS. BELLSOUTH CHOSE TO CONSTRUCT A SEPARATE

7 SYSTEM FOR ALECs TO USE FOR PREORDERING, ORDERING,

8 PROVISIONING, AND MAINTENANCE." PLEASE COMMENT.

9

10 A. ITC^DeltaCom's claim confuses the issues of access, interfaces, and

11 OSS. As I stated in my direct testimony in response 2(a)(1), the

12 Telecommunications Act of 1996 at Section 251(c)(3) only requires that

13 BellSouth provide nondiscriminatory access to network elements,

14 including OSS. First, ITC^DeltaCom *does* have direct access to

15 BellSouth's existing OSS via the electronic interfaces, just as

16 BellSouth's retail units access BellSouth's existing OSS via the

17 interfaces they use. In the case of access to maintenance and repair

18 OSS, BellSouth and ALECs can use the same interface, TAFI. As I

19 described in my direct testimony in response to ITC^DeltaCom's Issue

20 3(m), the difference between ALEC TAFI and BellSouth TAFI is that

21 ALEC TAFI combines functionality for both residential and business

22 services, while BellSouth must use separate TAFI interfaces for its

23 residential and business retail units.

24

5

1   What ITC^DeltaCom seems to be claiming is that it should not have to

2   pay for the electronic interfaces to BellSouth's OSS because it wants to

3   use the same interfaces used by BellSouth for its retail customers.

4   First, the Telecommunications Act of 1996 does not require identical

5   access, but rather non-discriminatory access. Second, BellSouth does

6   not have a single system that it uses for its own customers, nor are the

7   systems used by BellSouth suitable for ALECs. As I discussed in my

8   direct testimony, BellSouth uses three different systems for ordering:

9   Regional Negotiation System ("RNS") for residential customers

10   throughout BellSouth's region; Direct Order Entry ("DOE") for business

11   customers in Florida, Georgia, North Carolina, and South Carolina; and

12   the Service Order Negotiation System ("SONGS") for Alabama,

13   Kentucky, Louisiana, Mississippi, and Tennessee. DOE and SONGS

14   also are used for types of residential transactions that are not handled

15   by RNS. Thus, if ALECs were to use the "same interfaces" as

16   BellSouth, they would have to implement three different interfaces to

17   place orders in BellSouth's region. There are other problems with

18   ITC^DeltaCom's suggestion as well. For example, RNS does not

19   support the most basic types of ALEC resale orders, "switch-as-is" and

20   "switch-with-changes." Another problem would be industry standards.

21   RNS, DOE, and SONGS do not follow the industry standards for

22   ordering, and do not follow the proposals emerging from the industry

23   committee. Finally, RNS, DOE, and SONGS do not support the

1 ordering of UNEs. It is clear that BellSouth's decision to build electronic

2 interfaces to its OSS for the ALECs was a reasonable one.

3 Q. ON PAGE 5 OF HIS TESTIMONY, MR. THOMAS STATES THAT ~~"THE~~

4 ~~PRODUCTION OF THE CSR PARSING SPECIFICATIONS AND~~ THE

   Has
5 RSAG ~~HAVE~~ BEEN ORDERED BY THE FLORIDA PUBLIC SERVICE

6 COMMISSION". PLEASE COMMENT.

7

8 A. The Commission Order issued in Florida was interpreting an existing

9 interconnection agreement and, thus, should not be considered in this

10 proceeding. The conclusion reached in Florida was based on the

11 provisions of the Interconnection Agreement of BellSouth and the ALEC

12 involved. The Commission's decision did not establish what BellSouth

13 is required to do under the Telecommunications 1996 Act of 1996 which

14 is the issue in this arbitration dispute.

15

16 Q. ON PAGE 5 OF MR. THOMAS' TESTIMONY, HE STATES THAT

17 "ABSENT A PRE-ORDERING INTERFACE THAT INTEGRATES WITH

18 EDI, ITC^DELTACOM NEEDS THE ABILITY TO: ~~(1) PARSE~~

19 ~~CUSTOMER SERVICE RECORDS ("CSRo")~~ (2) ELECTRONICALLY

20 RECEIVE DOWNLOADS OF THE REGIONAL STREET ADDRESS

21 GUIDE ("RSAG")". DOES BELLSOUTH ALREADY PROVIDE

22 ITC^DELTACOM AND OTHER ALECS ~~CSR~~ INFORMATION ~~IN A~~

23 ~~MANNER THAT CAN BE PARSED?~~

24

1   A.   Yes. As I described in my direct testimony, BellSouth implemented the

2   TAG pre-ordering interface, based on the Common Object Request

3   Brokering Architecture (CORBA) on August 18, 1998. TAG is a

4   national standard machine-to-machine interface that can be integrated

5   with either the TAG ordering interface (available since November 1,

6   1998) or the EDI ordering interface (available since December 31,

7   1996). EDI is the ordering interface used by ITC^DeltaCom. ~~The CSR~~

8   ~~data which is delivered to the ALEC via TAG can be parsed by the~~

9   ~~ALEC to exactly the level needed on an order, just as BellSouth parses~~

10   ~~CSR's in its own retail operations.~~

11

12   Q.   MR. ROZYCKI ON PAGE 13 OF HIS TESTIMONY STATES THAT

13   "BELLSOUTH HAS NOT COMMITTED TO PROVIDING

14   ITC^DELTACOM A DOWNLOAD OF THE RSAG DATABASE

15   INCLUDING UPDATES". DO YOU AGREE?

16

17   A.   No. I do not agree. As stated in my direct testimony, BellSouth has

18   made a proposal to ITC^DeltaCom to provide a download of RSAG at

19   rates and conditions to be negotiated.

20

21   Q.   MR. THOMAS, ON PAGE 6, OF HIS TESTIMONY STATES THAT

22   "THE FCC HAS FURTHER CONCLUDED THAT IN ORDER FOR

23   BOCS TO DEMONSTRATE NONDISCRIMINATORY ACCESS TO

24   OSS FUNCTIONS, A BOC MUST 'PROVIDE THE SAME ACCESS TO

25   COMPETING CARRIERS THAT IT PROVIDES TO ITSELF.' BY

1   REQUESTING THE . . . RSAG INFORMATION, ITC^DELTACOM IS

2   SIMPLY ASKING BELLSOUTH TO PROVIDE THE SAME ACCESS

3   TO THE OSS INFORMATION THAT BELLSOUTH PROVIDES TO

4   ITSELF." PLEASE COMMENT.

5

6   A.   As previously stated, BellSouth's electronic interfaces provide ALECs

7   with access to BellSouth's OSS for the required functions and

8   informational databases, i.e. RSAG, in substantially the same time and

9   manner as BellSouth provides to its retail customers. BellSouth is not

10   obligated to provide ALECs with any additional OSS.

11

12   Q.   ON PAGE 5 OF MR. THOMAS TESTIMONY, HE STATES THAT " AN

13   ELECTRONIC DOWNLOAD OF THE RSAG DATABASE . . . WILL

14   ALLOW ITC^DELTACOM TO INCORPORATE THIS INFORMATION

15   INTO ITC^DELTACOM'S BACK OFFICE SYSTEMS TO CHECK

16   VALIDITY OF THE CUSTOMER'S ADDRESS, JUST AS

17   BELLSOUTH'S SYSTEMS USE THE RSAG DATABASE TO CHECK

18   BELLSOUTH'S ORDERS." PLEASE COMMENT.

19

20   A.   Throughout its Petition for Arbitration and the draft interconnection

21   agreement, ITC^DeltaCom stresses the importance of an electronic

22   interface for pre-ordering for real-time access to BellSouth's OSS.

23   BellSouth offers such access via LENS and TAG. Yet, by requesting a

24   download of RSAG, ITC^DeltaCom apparently wants a less efficient

25   means of data access. Moreover, ITC^DeltaCom wants this less

1   efficient means of data access at no charge. As stated on page 29 of

2   Mr. Wood's testimony, "ITC^DeltaCom proposes that BellSouth will

3   transmit a subset of the RSAG to ITC^DeltaCom on a daily basis <u>at no</u>

4   <u>charge</u> . . . ". As discussed previously, BellSouth has made a proposal

5   to ITC^DeltaCom to provide a download of Regional Street Address

6   Guide (RSAG) at rates and conditions to be negotiated.

7

8   Q.   MR. THOMAS, ON PAGE 5 OF HIS TESTIMONY, STATES THAT ~~"BY~~

9   ~~HAVING THE ABILITY TO PARSE THE CSR,~~ ITC^DELTACOM CAN

10   BUILD ~~CSR~~ INFORMATION INTO THE EDI ORDER WITHOUT

11   HAVING TO REKEY INFORMATION". PLEASE COMMENT.

12

13   A.   If ITC^DeltaCom were to integrate TAG with its EDI ordering interface,

14   it would eliminate any need to rekey or re-enter information. When

15   integrated, TAG will populate the ~~CSR information and~~ RSAG

16   information into the EDI or TAG ordering interface, whichever the ALEC

17   chooses to use.

18

19   Q.   ~~MR.~~ THOMAS OF ITC^DELTACOM, ON PAGE 17 OF HIS

20   TESTIMONY, CLAIMS THAT THE LOCAL CARRIER SERVICE

21   CENTER ("LCSC") IS OPEN 8:00A.M. TO 5:00 P.M.   IS THIS

22   CORRECT?

23

24   A.   No.

25

10

1   Q.   WHEN IS THE LCSC OPEN?

2

3   A.   The hours for the LCSC are currently 24 hours a day, 7 days a week.

4   However, the LCSC hours of operation will soon be changed to Monday

5   through Saturday from 7:00 a.m. to 10:00pm Eastern Time. This is

6   different than stated in my direct testimony. . The change being made

7   will establish hours for the LCSC equivalent with BellSouth's own retail

8   hours.

9

10 Q.   ON PAGES 17-18 OF HIS TESTIMONY, MR. THOMAS COMPLAINS

11   THAT THE HOURS BELLSOUTH OFFERS LIMIT ITC^DELTACOM'S

12   ABILITIY TO CONVERT CUSTOMERS TO ITC^DELTACOM

13   SERVICE. TO SOLVE THIS ALLEGED PROBLEM, MR. THOMAS

14   WOULD LIKE BELLSOUTH TO BE REQUIRED TO PROVIDE "AFTER

15   HOURS ASSISTANCE." PLEASE COMMENT.

16

17 A.   BellSouth already provides "after hours assistance" to ALECs. As I

18   stated in my direct testimony, after hours work by the Unbundled

19   Network Element Center ("UNEC") may be arranged on a case-by-case

20   basis for an additional fee. The LCSC's hours extend beyond what

21   ITC^DeltaCom desires. BellSouth views ITC^DeltaCom's desire to

22   change the UNEC hours as simply an attempt to pass its costs onto

23   BellSouth.

24

1   Q.   MR. THOMAS, ON PAGE 18 OF HIS TESTIMONY, DESCRIBES THE

2   FUNCTIONALITY WHICH ITC^DELTACOM ALLEGES IS REQUIRED

3   IN A MAINTENANCE AND REPAIR INTERFACE. DO TAFI AND

4   ECTA ALREADY PROVIDE ITC^DELTACOM WITH THE

5   FUNCTIONALITY REQUIRED TO ENABLE ITC^DELTACOM TO

6   KEEP ITS CUSTOMERS INFORMED?

7

8   A.   Yes. As I've stated in my direct testimony, BellSouth provides

9   ITC^DeltaCom with non-discriminatory access to its maintenance and

10   repair OSS by providing TAFI and ECTA Gateway. Among other

11   things, these interfaces allow ALECs to enter customer trouble tickets

12   into the BellSouth system, retrieve and track current status on all

13   trouble and repair tickets, and receive an estimated time to repair on a

14   real-time basis.

15

16 Q.   MR. THOMAS, ON PAGE 18 OF HIS TESTIMONY, STATES THAT

17   ITC^DELTACOM SHOULD BE ABLE " . . . ENTER A NEW TROUBLE

18   TICKET INTO THE BELLSOUTH MAINTENANCE SYSTEM. . .

19   RETRIEVE A LIST OF ITEMIZED TIME AND MATERIAL CHARGES

20   AT THE TIME OF TICKET CLOSURE. . . " FROM TAFI. PLEASE

21   COMMENT.

22

23 A.   Itemized time and material charges are not available in TAFI for

24   BellSouth's own retail units or for ALECs.

25

1

2 Q. ON PAGE 15 OF HIS TESTIMONY, MR. HYDE STATES THAT

3 "CURRENTLY BELLSOUTH CANNOT PROCESS 20% TO 25% OF

4 ITC^DELTACOM'S ORDERS MECHANICALLY". FURTHERMORE,

5 MR. THOMAS STATES, ON PAGE 2 OF HIS TESTIMONY, THAT

6 "UNFORTUNATELY, 20–25% OF THE ORDERS THAT

7 ITC^DELTACOM CURRENTLY PLACES VIA EDI ARE NOT YET

8 ACCEPTED BY BELLSOUTH'S ELECTRONIC SYSTEMS". PLEASE

9 COMMENT.

10

11 A. As I explained in direct testimony in response to ITC^DeltaCom's Issue

12 2(g), nondiscriminatory access does not require that all information and

13 functions for ALECs be entirely electronic and involve no manual

14 handling. Many services, primarily complex services, involve

15 substantial manual handling by BellSouth for both ALECs and

16 BellSouth's retail customers. Thus, nondiscriminatory access to pre-

17 ordering, ordering, and provisioning functions for ALECs also

18 legitimately may involve manual processes.

19

20 The specialized and complicated nature of complex services, together

21 with their relatively low volume of requests relative to basic exchange

22 services, renders them less suitable for mechanization, whether for

23 retail or resale applications. Complex variable processes are difficult to

24 mechanize, and BellSouth has concluded that mechanizing many

13

1   lower-volume complex retail services would be imprudent for its own

2   retail operations, in that the benefits of mechanization would not justify

3   the cost. Since the same manual processes are in place for both ALEC

4   and BellSouth retail complex service requests, the processes are

5   competitively neutral.

6

7   Q   MR. THOMAS STATES, ON PAGE 3 OF HIS TESTIMONY, THAT " OF

8   THE 75-80% OF ITC^DELTACOM'S ORDERS THAT ARE

9   SUBMITTED ELECTRONCIALLY, 62% OF THESE ORDERS FALL

10   OUT FOR MANUAL HANDLING BY BELLSOUTH." ON THE OTHER

11   HAND, MR HYDE, ON PAGE 15 OF HIS TESTIMONY, SAYS THAT

12   MORE THAN 50% FALLOUT. PLEASE COMMENT?

13

14 A. EDI is ITC^DeltaCom's chosen electronic ordering interface. In order to

15   enable ALECs to submit some complex LSRs electronically, rather than

16   by fax, BellSouth designed the EDI and TAG ordering interfaces to

17   accept LSRs for four complex services: PBX trunks, Synchronet® (a

18   private line data service), ISDN Basic Rate Service, and hunting. While

19   these services may be ordered electronically via EDI and TAG, the

20   LSRs for these services "fall out" for manual handling. This "fall out"

21   has nothing to do with any supposed inadequacies in BellSouth's

22   systems, but results from the fact that the requested services are

23   complex. After these LSRs are transmitted to BellSouth via EDI, they

24   are handled as if they were faxed LSRs for complex services. All ALEC

14

1   LSRs for complex services are handled in substantially the same time

2   and manner as service requests for complex services are handled for

3   BellSouth's retail customers. I discussed the manual handling of ALEC

4   and BellSouth service requests in my direct testimony in response to

5   ITC^DeltaCom's Issue 2(g).

6

7 Q. DO YOU AGREE WITH MR HYDE'S ASSESSMENT THAT MORE

8   THAN 50% OF ITC^DELTACOM'S ORDERS SUBMITTED

9   ELECTRONICALLY FALL OUT FOR MANUAL HANDLING?

10

11 A. Yes. I have reviewed ITC^DeltaCom's flow-through data for the last 9

12   months and in excess of 50% of the services ordered electronically by

13   ITC^DeltaCom fall out for manual handling by design. BellSouth is

14   pleased to know that ITC^DeltaCom has discovered the expedience of

15   ordering these complex services via EDI rather than fax.

16

17 Q. IN YOUR DIRECT TESTIMONY, YOU DISCUSSED "ORDER FLOW

18   THROUGH" AND THE METHODS USED BY BELLSOUTH TO

19   CALCULATE AND REPORT FLOW THROUGH. HAVE YOU

20   EVALUATED ITC^DELTACOM'S USE OF THE ELECTRONIC

21   INTERFACES BASED ON THE DATA CONTAINED IN THE PERCENT

22   FLOW THROUGH SERVICE REQUESTS REPORT?

23

24 A. Yes. To better understand ITC^DeltaCom's use of electronic interfaces,

1   a comparative analysis of its individual data with the ALEC aggregate

2   was conducted using the July 1999 Flow Through Report. The results

3   are as follows:

4

	Fatal Reject Rate	Auto Clarification & ALEC Error Rate	Manual Fallout Rate
ITC^DeltaCom	3.8%	40.8%	66.6%
ALEC Aggregate	0.5%	10.8%	6.9%

5

6   Further, an examination of the flow through data for the nine month

7   period November 1998 through July 1999 shows that ITC^DeltaCom

8   had electronically submitted 9,522 LSRs. From these submissions, 545

9   (5.7%) were immediately rejected due to fatal errors on the part of

10   ITC^DeltaCom. From the remaining Total Mechanized LSRs of 8,432

11   (8,977 – 545), 5,159 (61.2%) fell out by design for manual processing.

12   This "fall out by design" is the direct result of the products and services

13   ITC^DeltaCom has decided to market to its end users, specifically

14   complex services and hunting to business end user customers. In

15   addition, of the LSRs remaining after consideration for those which fell

16   out for manual processing, ITC^DeltaCom experienced an auto

17   clarification and ALEC error rate of approximately 40% during this same

18   nine month period.

19

20   From this one can conclude that:

1   1) ITC^DeltaCom has difficulty submitting complete and accurate

2   LSRs due to the high fatal reject rate and auto clarification and

3   ALEC error rate; and

4   2) ITC^DeltaCom's market plan drives a high manual fallout rate which

5   is not representative of the ALEC community as a whole.

6

7   Q.   ON PAGES 6-7 OF HIS TESTIMONY, MR. THOMAS STATES THAT

8   "THE COMMISSION SHOULD REQUIRE BELLSOUTH TO PROVIDE

9   ITC^DELTACOM WITH THE MSAG AND SUBSEQUENT UPDATES

10 ON A DAILY BASIS". IS THIS MATTER AN ISSUE IN

11 ITC^DELTACOM'S ARBITRATION PETITION?

12

13 A.   No. This matter was raised for the first time in Mr. Thomas' testimony.

14 This request is not contained in ITC^DeltaCom's Petition for Arbitration,

15 as an issue in dispute and BellSouth has not seen this subject

16 addressed previously. Specifically, ITC^DeltaCom's Arbitration Petition

17 did not include the issue of the Master Street Address Guide ("MSAG")

18 and subsequent updates. This matter, therefore, is not an issue subject

19 to this arbitration. However, I will explain what the MSAG is and the

20 manner in which BellSouth provides it and its updates to ALECs,

21 including ITC^DeltaCom.

22

23 Q.   WHAT IS MSAG?

24

17

1   MSAG is the portion of the E911 database, which contains the street

2   address and the selective routing feature, also known as ESN.

3

4 Q. WHO IS RESPONSIBLE FOR THE MSAG?

5

6 A. It is the responsibility of the E911 Customer to assign, maintain and

7   resolve discrepancies in MSAG data for their serving area. The E911

8   Customer is defined as the Governmental Agency responsible for

9   providing public safety. The E911 Customer is also responsible for

10   providing new address information and changes to SCC

11   Communications Corp. for updates to the MSAG. SCC

12   Communications Corp. is the 911 Vendor contracted by BellSouth to

13   maintain the MSAG.

14

15 Q. IS ITC^DELTACOM CURRENTLY PROVIDED THE MSAG AND

16   SUBSEQUENT UPDATES?

17

18 A. Yes, ITC^DeltaCom is currently provided MSAG updates on a quarterly

19   basis for the territories in which it provides end user service.

20

21 Q. ON PAGE 2 OF HIS TESTIMONY, MR THOMAS COMPLAINS THAT

22   EDI DOES NOT ALLOW AN INTERCEPT MESSAGE TO BE PLACED

23   ON THE SAME LSR AS THE REQUEST FOR THE LOOP. DO YOU

24   AGREE?

1

2 A. Yes. When the ALEC submits an LSR for a loop via EDI or TAG, with

3 the telephone number assigned from an NPA/NXX owned by the ALEC,

4 a request for a reference of calls (intercept message) can not be placed

5 on the same LSR.

6

7 Q. IF THE ALEC WANTS TO ADD A REFERENCE OF CALLS ON A LSR,

8 WHEN SHOULD THE ALEC SUBMIT THE LSR FOR THE

9 REFERENCE OF CALLS?

10

11 A. The ALEC has two options. A subsequent LSR may be submitted via

12 EDI or TAG for the reference of calls, or the ALEC can submit the LSR

13 manually.

14

15 Q. ARE CHANGES BEING MADE TO ALLOW THE LOOP AND

16 INTERCEPT TO BE PLACED ON THE SAME ELECTRONICALLY

17 SUBMITTED LSR?

18

19 A. Yes. The situation is being addressed in Release 6.0.

20

21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

22

23 A. Yes.

1 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

2

3 A. BellSouth has not received sufficient documentation from

4 ITC^DeltaCom about this issue to enable BellSouth to provide a

5 definitive response at this time. However, if BellSouth provides the

6 HDSL and ADSL ~~facilities,~~ *service or HDSL and ADSL compatible loops* BellSouth will provide maintenance and

7 repair of the ~~facilities~~ in accordance with the terms of the tariff (ADSL

8 services) or interconnection agreement (HDSL/ADSL compatible

9 loops) under which they are offered. ITC^DeltaCom loop modifications

10 are not offered as a UNE.

11

12 BellSouth does not provide HDSL and ADSL "facilities" as UNEs to

13 ITC^DeltaCom or to any other ALEC. BellSouth does, however,

14 provide a federally tariffed wholesale ADSL service to certain

15 wholesale customers. BellSouth's ADSL wholesale service is a

16 separate and distinct offering from an ADSL or HDSL *compatible* loop.

17 The latter is offered as a unique network capability on a UNE basis to

18 ALECs via the service inquiry process.

19

20 Q. HOW DOES THE ADSL COMPATIBLE LOOP DIFFER FROM THE

21 TARIFFED ADSL SERVICE?

22

23 A. BellSouth's ADSL tariffed service does not normally involve installation

24 of a new physical facility to the customer's premises because the

25 ADSL service actually uses the customer's existing local service

16

1   facility. Unless the Network Interface Device ("NID") needs to be

2   replaced, ADSL tariff service does not generally require a premises

3   visit by BellSouth. On the other hand, the ADSL compatible loop

4   offering always requires a designed physical loop facility and requires

5   dispatch of a BellSouth technician to the customer's premises. In

6   addition, the ADSL compatible loop requires a service inquiry, design

7   engineering, and connection and testing activities.

8

9 Q. WHAT ARE THE IMPLICATIONS OF THESE DIFFERENCES FOR

10   MAINTENANCE AND REPAIR RESPONSIBILITIES?

11

12 A. With respect to maintenance and repair, if BellSouth is providing its

13   HDSL or ADSL wholesale tariffed service, the maintenance and repair

14   are offered as part of such wholesale service. On the other hand, if

15   BellSouth is providing a loop that has been modified from its original

16   technical standards at the request of ITC^DeltaCom, then BellSouth

17   can not guarantee that the modified loop will meet the technical

18   standards of a non-modified loop.

19

20 Issue 20: [ITC^DeltaCom No. 2(c)(xiv)] (a) Should BellSouth be required

21 to coordinate with ITC^DeltaCom 48 hours prior to the due date of a

22 UNE conversion? (b) If BellSouth delays the scheduled cutover date,

23 should BellSouth be required to waive the applicable non-recurring

24 charges? (c) Should BellSouth be required to perform dial tone tests at

25 least 48 hours prior to the scheduled cutover date?

1   Q.   WHICH PARTS OF THIS ISSUE ARE YOU ADDRESSING?

2

3   A.   *My testimony addresses sub-parts (a)* ~~and (c). Sub-part (b) is~~

4   ~~addressed in the testimony of Mr. Alphonso Varner.~~

5

6   **Issue 20(a): [ITC^DeltaCom No. 2(c)(xiv)] Should BellSouth be required**

7   **to coordinate with ITC^DeltaCom 48 hours prior to the due date of a**

8   **UNE conversion?**

9

10   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

11

12   A.   With regard to sub-part (a), BellSouth opposes the 48-hour

13   requirement for all UNEs as set forth in ITC^DeltaCom's proposed

14   language at Att. 4.9.1 as the language is too broad. For example, the

15   language would include SL1 loops that are not normally subject to

16   coordination. Further, with regard to SL2 loops only, BellSouth agrees

17   that it will exert its best efforts to schedule a conversion date and time

18   24 to 48 hours prior to a conversion.

19

20   **Issue 20(c): [ITC^DeltaCom No. 2(c)(xiv)] Should BellSouth be required**

21   **to perform dial-tone tests at least 48 hours prior to the scheduled**

22   **cutover date?**

23

24   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

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1   With regard to sub-part (c), BellSouth's understanding is that what

2   ITC^DeltaCom apparently wants is for a BellSouth technician to verify

3   ITC^DeltaCom's facilities between BellSouth's central office and

4   ITC^DeltaCom's central office are in working order. Further,

5   ITC^DeltaCom wants BellSouth to use the ANAC functionality to verify

6   that ITC^DeltaCom's order is correct and that the assigned

7   ITC^DeltaCom switch port has dialtone.

8

9   While BellSouth understands the basis for ITC^DeltaCom's request,

10   these are extra measures that in many cases do no more than perform

11   certain testing "up front" in order to allow ITC^DeltaCom to correct its

12   own mistakes. BellSouth is working with ITC^DeltaCom to arrive at a

13   workable solution to ITC^DeltaCom's request.

14

15   **Issue 21: [ITC^DeltaCom No. 2(f)] Should BellSouth be required to**

16   **establish Local Number Portability (LNP) cutover procedures under**

17   **which BellSouth must confirm with ITC^DeltaCom that every port**

18   **subject to a disconnect order is worked at one time?**

19

20   Q.   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

21

22   A.   ITC^DeltaCom has included new timeframes in the proposed

23   interconnection agreement language that Bellsouth must still review

24   before it can fully respond. BellSouth, however, does agree that

25   coordination between itself and ITC^DeltaCom is extremely important

19

1   for LNP order cutovers. Additionally, BellSouth already has LNP

2   cutover procedures in place.

3

4   **Issue 29: [ITC^DeltaCom No. 3(h)] If ITC^DeltaCom needs to reconnect**

5   **service following an order for a disconnect, should BellSouth be**

6   **required to reconnect service within 48 hours?**

7

8   Q   WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

9

10   A.   BellSouth should not be required to maintain facilities for any set

11   period of time once a service has been disconnected. As a practical

12   matter, once a UNE facility has been disconnected for any reason, that

13   facility is subject to immediate reuse. In an area experiencing a

14   shortage of facilities, it would not be unusual for a facility used by an

15   ALEC or by a BellSouth retail unit to be reassigned within minutes in

16   order to complete a local service request ("LSR") for an ALEC or a

17   service order for a BellSouth retail end-user customer. Therefore,

18   while BellSouth will exert its best efforts to reconnect facilities in

19   unusual situations as expeditiously as possible, BellSouth can not

20   commit to reconnect service after disconnection. It should be pointed

21   out that the ALEC shares the responsibility to conduct appropriate

22   tests prior to any cutover activity, thus avoiding any need to reconnect

23   a service.

24

25   Q.   DOES THIS CONCLUDE YOUR TESTIMONY?

1

2   A.   Yes.

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1 BY MR. GOGGIN (Continuing):

2   Q   Mr. Pate, have you prepared a summary of your

3 testimony?

4   A   Yes, I have.

5   Q   Would you please proceed with that summary?

6   A   Certainly.

7   Good morning. The purpose of my testimony is

8 to address BellSouth's electronic interfaces to the

9 Operation Support Systems, OSS, developed solely for

10 Alternative Local Exchange Carriers, ALECs. I will

11 specifically address issues raised by ITC^DeltaCom

12 relative to OSS concerning parity, order flow-through,

13 the Regional Street Address Guide, RSAG, and repair

14 information.

15   Issue 3(b), Sub Part (1) deals with parity as

16 it relates to OSS. The 1996 Telecommunications Act

17 imposes a duty upon the incumbent local exchange carrier,

18 such as BellSouth, to provide nondiscriminatory access to

19 their Operation Support Systems' functions for

20 preordering, ordering, provisioning, maintenance and

21 repair, and billing for network elements and resale

22 services.

23   What the FCC has said about nondiscriminatory

24 access is that the incumbent local exchange carrier must

25 provide ALECs access to these required functions and

1 information for resold services in substantially the same

2 time and manner as it provides access for itself. For

3 unbundled network elements, an incumbent must provide

4 access that provides efficient ALECs with a meaningful

5 opportunity to compete. Neither the Telecommunications

6 Act nor the FCC requires that ALECs' access be identical

7 but, rather, that it must be nondiscriminatory access.

8 To date BellSouth provides three electronic

9 interfaces solely for ALECs specific to the functions of

10 preordering and ordering and provisioning. These

11 interfaces are the Telecommunications Access gateway,

12 TAG; Electronic Data Interchange, EDI; and the Local

13 Exchange Negotiation System, LENS.

14 Two of the interfaces, TAG and LENS, provide

15 ALECs with real-time access to the same preordering

16 databases used by BellSouth's retail representatives.

17 All three interfaces provide for the functions of

18 ordering and provisioning. And TAG and EDI are industry

19 standard based systems. A critical component cited by

20 the FCC that would eliminate the need for new entrants to

21 develop multiple interface systems, one for each

22 incumbent local exchange carrier. Additionally, the

23 preordering functionality of TAG is integratable with the

24 ordering functionality of EDI.

25 Issue 22 concerns the definition of

1 flow-through, a key measurement of the electronic

2 interfaces. In its second Louisiana order in CC Docket

3 Number 98-121, dated October 13th, 1998, the FCC stated,

4 and I quote: A competing carrier's orders flow-through

5 if they are transmitted electronically through the

6 gateway and are accepted into BellSouth's back office

7 order systems without manual intervention, end quote.

8   BellSouth defines flow-through consistent with

9 this FCC definition. A Local Service Request, LSR, from

10 an ALEC is said to flow through when the LSR is entered

11 by an ALEC into one of BellSouth's interfaces -- TAG, EDI

12 or LENS -- and is electronically submitted to the Service

13 Order Control System, SOCS, untouched by human hands.

14   The exhibit filed in my testimony explicitly

15 illustrates this process flow of an electronically

16 submitted Local Service Request to generate a service

17 order which will be accepted by BellSouth's back office

18 order systems. To further clarify the process flow as it

19 relates to the term flow-through, my exhibit that's

20 utilized here, an excerpt from an actual report that's

21 provided monthly to all ALECs. This clearly illustrates

22 how the flow-through rate is derived, given consideration

23 to LSRs which manually fall out by design to the Local

24 Carrier Service Center, LCSC, for processing as well as

25 LSRs' fatal rejects, LSRs' rejects due to auto

1 clarifications, and LSR errors which fall out for manual

2 processing to the LCSC for both ALEC- and

3 BellSouth-caused errors. All this further clarifies,

4 once again, that BellSouth's definition of flow-through

5 is consistent with the FCC definition of flow-through.

6   Now ITC^DeltaCom has proposed a different

7 definition of flow-through be incorporated into the

8 Interconnection Agreement. While BellSouth does not

9 believe it is necessary for the Interconnection Agreement

10 to contain a definition of flow-through, the agreement

11 should not contain a definition inconsistent with that of

12 the FCC's definition, which is what ITC^DeltaCom is

13 proposing.

14   Issue 5 concerns a download of the Regional

15 Street Address Guide, RSAG. BellSouth currently makes

16 the RSAG available on a real-time basis electronically

17 through the LENS and TAG preordering interfaces. This

18 access, obviously, includes updates to the RSAG. Thus,

19 BellSouth has met its requirements by providing

20 ITC^DeltaCom with nondiscriminatory access to the RSAG

21 and should not be required to provide a download of the

22 RSAG. Even though BellSouth is not required to provide a

23 download, a written proposal was made to ITC^DeltaCom to

24 provide such at proposed cost, terms and conditions, as

25 well as proposed language to be inserted in the

Interconnection Agreement. BellSouth stands ready to meet with ITC^DeltaCom to continue these negotiations if ITC^DeltaCom is still interested in pursuing its request.

Issue 34 concerns the type of repair information BellSouth should be required to provide, such that ITC^DeltaCom can keep their end-user customers informed.

With respect to repair and maintenance of OSS, ITC^DeltaCom and other ALECs have nondiscriminatory access via the Trouble Analysis and Facilitation Interface, TAFI, and the industry standard base Electronic Communication Trouble Administration, ECTA, gateway. Among other things, these interfaces allow ITC^DeltaCom to enter customer trouble tickets into the BellSouth system, retrieve and track current status on trouble tickets, and receive an estimated time to repair.

TAFI is the interface of choice for ITC^DeltaCom. TAFI, simply stated, is a user-friendly repair and maintenance interface that often enables trouble reports to be cleared by the repair attendant handling the initial customer contact, frequently with the customer still on the line. But the main point I'd like to clarify is that TAFI is the same repair and maintenance interface used by BellSouth's retail repair

1   attendants. Thus, in this case of TAFI, ITC^DeltaCom is

2   being provided with identical access; and, therefore,

3   without question, nondiscriminatory access.

4   However, the issue identified by ITC^DeltaCom

5   during the negotiation of the Interconnection Agreement

6   was for increased functionality in TAFI beyond what

7   BellSouth provides itself. Specifically, ITC^DeltaCom

8   desired to retrieve a list of itemized time and material

9   charges at the time of a trouble ticket's closure.

10   BellSouth does not provide this for itself and,

11   therefore, is not required to provide such under the

12   Telecommunications Act.

13   The issue now presented by ITC^DeltaCom in this

14   arbitration proceeding is a concern with the details of

15   the invoice provided to ITC^DeltaCom. ITC^DeltaCom

16   desires an itemization of time and material charges

17   associated with any work performed by a BellSouth

18   technician, whether it be for repair and maintenance or

19   for work associated with a new installation. It should

20   be noted that the number of transactions where an invoice

21   is rendered for such work is a small, very small

22   percentage of the overall trouble transactions.

23   Furthermore, it is even a smaller subset of those

24   transactions where a breakdown of time and material is

25   applicable. However, the main point here is that the

1 process utilized for invoicing ITC^DeltaCom, and all

2 ALECs, is the same process that BellSouth retail units

3 use to invoice its end-user customers for these same type

4 of charges incurred. This process provides sufficient

5 information to enable ITC^DeltaCom to bill its end

6 users. Thank you. This concludes my summary.

7   MR. GOGGIN: Commissioner, Mr. Pate is now

8 available for cross examination.

9   COMMISSIONER CLARK: Mr. Adelman.

10   MR. ADELMAN: Yes, thank you, Commissioners.

11   CROSS EXAMINATION

12 BY MR. ADELMAN:

13   Q   Good morning, Mr. Pate. I'm David Adelman. How

14 are you?

15   A   Fine. Good morning.

16   Q   Mr. Pate, I want to ask you a few questions to

17 help me understand OSS in particular. I want to try to

18 draw a contrast between the type of access and OSS that

19 ALECs have in Florida and the type of access and OSS that

20 BellSouth utilizes to provision services for its own

21 retail customers in Florida.

22   A   Certainly.

23   Q   And I'd like you to assume for a moment with me

24 that we're dealing with a customer who is switching from

25 BellSouth to ITC^DeltaCom and the customer is currently

1 being served BellSouth's ESSX service. You're familiar

2 with that service, correct?

3 　　A　　Yes.

4 　　Q　　What is ESSX service? Just to make the record

5 clear.

6 　　A　　I don't know if I can do adequate description

7 of the details, but essentially, the ESSX service, from

8 my standpoint, would give them their own, for lack of a

9 better way to describe it, internal system for their own

10 cost and distribution.

11 　　Q　　It's a business service, correct?

12 　　A　　Yeah, definitely business service.

13 　　Q　　Fairly common business service. BellSouth has

14 provided it for some time. It's in BellSouth's tariff,

15 correct?

16 　　A　　Correct. Correct.

17 　　Q　　And ITC^DeltaCom wants to provide service to

18 this customer using one FBs, basic business lines,

19 correct?

20 　　A　　Okay.

21 　　Q　　And let's assume the customer wants -- has

22 eight access lines associated with this order. Do you

23 follow?

24 　　A　　I follow.

25 　　Q　　That could be a doctor's office or a law firm,

1 some sort of retail store. That would be a common type

2 of arrangement; would you agree?

3   A   I would agree.

4   Q   Now the way I -- and you understand that

5 ITC^DeltaCom currently places orders using EDI; do you

6 understand that?

7   A   That's the primary -- They do use some LENS,

8 but the bulk of theirs comes in about, I would say, 80 to

9 85% via EDI.

10   Q   And you would agree, would you not, that

11 ITC^DeltaCom strives to place as many orders

12 electronically as possible?

13   A   Looking at the review of their actual orders, I

14 would definitely agree with that statement, yes.

15   Q   Okay. Now ITC^DeltaCom places this order

16 through EDI, and it would have to be processed through

17 what in Florida is DOE, correct?

18   A   For the BellSouth retail representative, yes,

19 they would use DOE.

20   Q   Okay. Well, let's trace the order then that

21 ITC^DeltaCom places through EDI.

22   A   Okay.

23   Q   The order is put into the systems that

24 ITC^DeltaCom has developed to build out to EDI, correct?

25   A   Correct.

1   Q   And then the access is provided through EDI,

2 correct?

3   A   For their electronic submission; is that what

4 you mean?

5   Q   Correct, it's done electronically.

6   A   Yes, uh-huh.

7   Q   And let's assume that there are no errors in

8 the order, that the address is correct, and all the

9 fields are filled out, whether it be NA or none, all

10 those things are done correctly. Do you follow?

11   A   I follow.

12   Q   What happens to that order? How does it --

13 Help me track it through your system.

14   A   Well, if I recall correctly, the scenario that

15 you described was eight lines, is what you're asking?

16   Q   Switched from ESSX service to 1FB, eight lines.

17   A   Well, what we haven't described is what's on

18 there, so any features. This is a resold service that

19 you're referring to.

20   Q   Well, let's say we're going to add a hubbing

21 feature. A pretty common arrangement, correct?

22   A   I don't know if it's pretty common, but I'm

23 familiar with the term. But at the moment I can't

24 picture in my mind how hubbing would impact it, at the

25 moment.

1   Q Okay.

2   A Let me describe -- There are two situations

3 that can happen here for clarification. Dealing with a

4 situation, a business order put in eight lines. The

5 order is submitted via EDI. And I tell you what, to

6 better illustrate this, let's go to the exhibit I have

7 because that really shows a process flow, and it may help

8 us understand.

9   Q Well, I'm glad to look at the exhibit, but I

10 would like you to answer this question with the facts

11 that I have presented and not change the facts on me.

12   A Sure. I'm not trying to change the facts, and

13 please, if I do so, help me, because you just want to use

14 it for everybody to understand this process flow, if I

15 understand what you're asking me.

16   The exhibit, and I've just flipped to my

17 exhibit, Page 2 of RMP-1, and you can see by this exhibit

18 where it indicates on the top left-hand side the CLEC.

19 The next block has LENS, EDI and TAG; that's the

20 interface we're talking about. The interface here

21 describes EDI. So when this order is submitted via EDI,

22 the order will first go into a system called LEO, Local

23 Exchange Ordering. There that system is applying some

24 basic up-front high-level edits and edits such as does

25 this field have something in it, and is it properly

1 formatted. If it accepts that, and let's just for ease

2 of simplicity say it does, then it goes to LESOG. LESOG

3 is the Local Exchange Service Order Generator. The LESOG

4 is going to apply some more sophisticated edits

5 associated with it. But for the sake of this

6 conversation though, let's assume that all those edits --

7   Q If I could, and I'm certainly not trying to cut

8 you off, but let's just use my facts. The order is

9 submitted correctly.

10   A Okay. All right, fine. All right, so --

11   Q Everything is right. I understand ITC^DeltaCom

12 sometimes makes errors, right?

13   A Yes.

14   Q And BellSouth sometimes makes errors, right?

15   A Most definitely, yes.

16   Q So let's assume in this case neither party made

17 any error. I just want to make it simple.

18   A Complete and accurate order, if I can borrow

19 those terms.

20   Q It is keyed in. The firm order confirmation is

21 received, and it's ready to go.

22   A Okay. Well, we are where I was trying to get

23 to anyway. The LESOG has to make a decision. The

24 decision is, is that type of order -- has the

25 functionality with that order been programmed for the

1   electronic systems to continue and process?

2   Q   Okay. And by that you mean is it a complex

3   order; is that correct?

4   A   Complex is the main category that would deal

5   with what I'm discussing here. The order that we

6   describe, the eight lines, for example, and the eight

7   lines, all the features associated with that order are

8   such that the systems have been programmed to accept it.

9   Then it's going to continue straight on through

10   untouched.

11   Q   Well, and again, I don't mean to interrupt, but

12   let's assume that it's a switch from ESSX service to

13   eight lines using 1FB, and let's add the hubbing

14   feature. Is that one that will continue through, or is

15   that one that by design falls out?

16   A   I can't recall for the hubbing. Can I give you

17   an illustration of what would fall out that I think

18   you're accustomed to? Which would be the hunting.

19   Q   Well, I'd like to talk about the hubbing

20   feature. Is your answer that you don't know whether

21   that's a complex order or not?

22   A   I just can't recall. I mean I have read

23   hubbing feature. It actually came up in Mr. Thomas's

24   testimony, but frankly, I just can't recall the hubbing

25   feature. If you have something you can cite me to to

1 refresh me, I'd be glad to --

2   Q   Tell me a feature other than hunting that does

3 fall out.

4   A   Okay. One that we have programmed now that

5 would fall out by design would be, if you were looking

6 for a synchronet service, which is a type of service that

7 the business community would use; and right now the

8 functionality is not there for the Local Exchange Service

9 Order Generator to transmit that -- or translate is the

10 better word -- that into the service order necessary for

11 downstream.

12   Q   Okay. So synchronet would fall out. How about

13 PBX; is that a good one?

14   A   Yeah PBX trunks would fall out too.

15   Q   Okay. PBX is a fairly common architecture for

16 small businesses, correct?

17   A   Fairly common. Some do, some don't. But, yes,

18 it's common.

19   Q   Okay. And let's assume, because you're

20 familiar with PBX, that the ITC^DeltaCom order is for

21 this business and they want PBX service added.

22   A   Okay.

23   Q   Now that, as I understand it, is a complex

24 order which by design will fall out, correct?

25   A   Correct.

1   Q   In other words, it won't go electronically

2 through EDI all the way through the system to be

3 provisioned, correct?

4   A   That is correct. It's going to fall out to the

5 Local Carrier Service Center, LCSC, where the

6 representatives there will then take that order that's

7 been electronically submitted which has helped get the

8 order in a complete and accurate fashion, and then use

9 those details to use the same system that the BellSouth

10 retail used, the DOE system, to then actually enter that

11 order.

12   Q   So in other words, and what I have in mind --

13 and we talked about this during the deposition. I want

14 to make sure my understanding is still correct. That

15 perhaps a piece of paper is generated at the LCSC, and

16 the information is then rekeyed in, it's keyed in by

17 BellSouth into DOE; is that correct?

18   A   That is correct.

19   Q   So ITC^DeltaCom keyed it in on their side, sent

20 it over electronically to BellSouth. It, by design, did

21 not flow through, and BellSouth took the order, took the

22 piece of paper, I understand it could be on a screen, but

23 had to rekey it into DOE; is that correct?

24   A   That is correct.

25   Q   And that's for eight lines, small business that

1 wants use of PBX?

2   A   Because of the PBX, that is the reason.

3   Q   Okay. Now assume for a moment that we have a

4 business that doesn't want to choose an ALEC but just

5 wants to use BellSouth's retail services, a new business

6 opens up and they call BellSouth, and they want that same

7 architecture, eight lines. They want the PBX function,

8 so they call up BellSouth to place the order. In that

9 case, it's my understanding, that the order is simply

10 keyed directly into DOE; is that correct? Assuming it's

11 in Florida.

12   A   For Florida, that's correct. It's keyed into

13 DOE just like it's keyed into DOE through the LCSC when

14 it fell out there for the ALEC order.

15   Q   Understood. And assuming the BellSouth

16 representative gets all the information correct and

17 there's no error in entering the order, it will flow

18 through and be handled completely electronically,

19 correct?

20   A   I take exception to your use of the word that

21 it flows through, and let me clarify why. We're mixing

22 here a little bit two different concepts of what is meant

23 by flow-through, and it gets back to the FCC definition;

24 and I've got to go back and lay a foundation so you

25 understand this.

1   What you're dealing with in receiving these

2   orders from an ALEC is receiving what's called the LSR,

3   the Local Service Request, format. Now that whole

4   format, that's not a BellSouth format. That's driven

5   under the Alliance for Telecommunications Industry

6   Solutions, ATIS organization, North American Standards

7   Body; and they have -- Mr. Thomas even referred to it in

8   his testimony delivery. They have a subcommittee under

9   that called OBF, Order and Billing Forum, and that

10 subcommittee, as a result, defines what an LSR format is,

11 the content of that. Then there is another committee

12 under ATIS, that deals actually with the electronic

13 submission of those. It's referred to as TCIF,

14 Telecommunications Industry Forum, and it has a committee

15 under that, ECIC, Electronic Communications

16 Implementation Committee, that then drives the standards

17 associated with, if you've heard the term electronic

18 bonding. It's an electronic exchange of information.

19   Now with that foundation laid, now let me go

20 back to deal with your question. When we talk about

21 order flow-through, what we're talking about is getting

22 that information that's in an LSR format and having a

23 service order generation component in our systems that we

24 have built specifically for ALECs to take that

25 information and convert it into what's referred to as a

1   sales service order format. That's what's been around

2   with BellSouth and other RBOCs for years, how their

3   systems receive that information and generate the order.

4   So when you try to compare that to DOE, this is

5   the main point I want to make, DOE is entering it

6   directly as a sales service order format. There is no

7   service order generation. There is no flow-through.

8   It's entered directly in that format to begin with. The

9   BellSouth representatives take this information, often

10 times, particularly for a PBX, they can't get all the

11 information they need to enter it while the customer is

12 on the line. They have to get the information, gather

13 everything they need, do some service inquiries, and then

14 come back and enter the order. So the flow-through is

15 not the same term. Once it's in, downstream provisioning

16 systems can then take care of the order, just like the

17 downstream provisioning systems will take care of the

18 order, actually inputted via DOE, in the Local Carrier

19 Service Center, for an LSR submitted by the ALEC.

20   Q   Let's talk about that BellSouth retail order.

21 The call is made, eight access lines, want PBX, the

22 BellSouth representative gets all the information

23 accurate. It then is entered into DOE, and is it

24 accurate to say it flows through DOE electronically

25 completely; isn't that fair to say? Does it fall out of

1 DOE?

2   A   It does not fall out -- It's the term,

3 flow-through, Mr. Adelman, that bothers me. It does not

4 fall out of DOE and that's because it's entered in that

5 sales service order format.

6   Q   I understand. Why don't we do this: To me the

7 corollary of flow-through is fallout. Orders either fall

8 out or they flow through; is that fair?

9   A   I'll accept that in the context you just gave

10 it. Okay.

11   Q   So the order doesn't fall out when it comes

12 directly to BellSouth, indeed it -- I won't use flow --

13 it goes through DOE completely electronically, correct?

14   A   Once they put it in, it goes through completely

15 electronically to all the downstream systems necessary

16 for the provision of the service.

17   Q   Okay. Now when the order comes into

18 ITC^DeltaCom, same order --

19   A   Okay.

20   Q   -- customer wants to switch, eight access

21 lines, wants the PBX feature, the order does fall out of

22 the system; and by that I mean it doesn't go through EDI

23 and through DOE electronically without manual

24 intervention by BellSouth, correct?

25   A   That is correct.

1   Q   Okay. And that's by design, correct?

2   A   Give me the whole question again just to keep

3 my focus, when you say by design.

4   Q   Okay. Sure. The order is placed by

5 ITC^DeltaCom for the six or eight access lines with the

6 PBX functionality, and you've agreed with me that the

7 order does not go through the systems fully

8 electronically, but rather it falls out of the systems

9 and has to be manually handled.

10   A   Correct.

11   Q   And my question was whether that is by design.

12   A   Okay. Thanks for restating that. Yes, that's

13 by design, that is correct. And you've got to understand

14 some of what's happened, why that's by design. It gets

15 back to the foundation I was trying to lay. All of the

16 LSR formats, that's evolving as to how you actually

17 submit this information. That comes out of OBF. And as

18 that continues to continue to evolve out of OBF and then

19 the electronic piece out of the TCIF and its subcommittee

20 ECIC, that's what gives the industry -- not just

21 BellSouth -- what we need to program that functionality.

22 So today for the PBX trunks, it's not there, and we do

23 not, once again -- as we have described here, we don't

24 use a process different from what we use for ourself.

25 It's done in substantially the same time and manner.

1   Q   So what you're saying, I think, and, you know,

2 if you let me try to put it in laymen's terms, is you

3 have not yet mapped the relationship, the connection

4 between EDI and DOE so that such an order would go

5 through the systems electronically completely, correct?

6   A   Yes, using map -- mapping is a term essentially

7 for programming, for development of code. And the

8 reason, once again, we haven't done that is because the

9 standard from the LSR format itself has not been

10 established. We've done many things in advance of

11 standards. We want -- BellSouth wants everything that we

12 can possibly program to come and flow through

13 electronically. It's in our best interest because it

14 results in less human intervention. With human

15 intervention, there is a possibility of errors, as well

16 as it impacts the speed of the processing. And that

17 allows, from us, to be more efficient operationally which

18 allows us to better serve our customer, in this case the

19 ALEC, ITC^DeltaCom, which in turn, allows them to better

20 serve their end-user customer. So we want as much as we

21 can to electronically flow through.

22   Q   So you can get ahead of the standards, and at

23 times you often do, and you're proud of that, correct?

24   A   The answer to your question is a yes/no. You

25 can sometimes get ahead of the standards. Sometimes you

1 can't. The nature of what you're dealing with is so

2 complex that it may not be even worth programming. It's

3 not worth the time. You could be dealing with a small

4 quantity, a very complex type of order. For those, the

5 systems aren't the proper route. You're going to have to

6 accept those are going to have to be manually done. For

7 those where standards haven't been established but you

8 can see there is a sufficient amount of quantity

9 involved, the complexity is such that it's conducive to

10 development, we will often times try to get ahead of it.

11 But understanding, you've got to balance all that out.

12 Because if we get ahead of it and then they come back and

13 give us a standard, that means you're going to reprogram

14 all that to match the standard. That impacts our

15 system. That could impact the side of the interface

16 associated with the ALEC. So you've got to balance all

17 those out when you're making these decisions as part of

18 your considerations.

19   Q   But, of course, you have a rate structure so

20 that C -- ALECs pay for the programming of these systems,

21 correct? So when you're talking about balancing out the

22 cost, you're doing it on behalf of the ALECs; is that

23 correct?

24   A   What you're asking me now is more of a

25 cost-related type question. I know there is factor

1   there. I'm not the cost expert. You'd have to ask Ms.

2   Caldwell the specifics about that.

3   Q   Fair enough.

4   A   But there's some relationship.

5   Q   Fair enough. Now let's talk about these orders

6   that fall out. Are you able to identify which ALEC

7   placed such an order?

8   A   Yes.

9   Q   Okay. So you know when an order has to be

10   manually handled whose order that was, correct?

11   A   Yes.

12   Q   And similarly, you would know for orders that

13   flow through fully electronically, you're able to

14   identify whose orders go through electronically, correct?

15   A   Yes.

16   Q   You can do that today, correct?

17   A   Yes.

18   Q   Okay. I have no further questions.

19   MR. ADELMAN: Thank you. Thank you, Mr. Pate.

20   COMMISSIONER CLARK: Staff.

21   CROSS EXAMINATION

22   BY MS. CALDWELL:

23   Q   Good morning, Mr. Pate. I'm Diana Caldwell.

24   You in your summary talked about LENS, EDI, and TAG;

25   that's correct?

1   A   That's correct.

2   Q   I think you had said that LENS was the Local

3   Exchange Negotiation System?

4   A   Navigation system.

5   Q   Navigation system, all right. Thank you.

6   And you also stated that EDI and TAG were

7   developed to the national standards?

8   A   That is correct.

9   Q   And what is the name of the committee or

10   organization that determines the standard?

11   A   Well, it's what I was describing earlier. I

12   said there are really several involved, so let me go back

13   over that one more time. The overall body, the

14   organization itself is ATIS, Alliance for

15   Telecommunications Industry Solutions. That's a North

16   American standards body that's -- they're really involved

17   with not only standards but also procedures, and the

18   overall operating procedures.

19   It's the result of that body that is why our

20   networks work. That's why you can place a call in

21   California and not only do the networks work with each

22   other, the equipment associated with that call is the

23   interoperability is there, and your call goes through.

24   Now under ATIS, there are several committees.

25   Specific to what we're dealing with here though, if you

1 can picture an organization chart, there is one arm of

2 that that's breaking out of ATIS that deals with the

3 development of what I refer to as the content standards.

4   The content standard is the LSR itself. So

5 they develop the format of the LSR. There are several

6 different sections in an LSR. They state what has to be

7 in each section so that you can manually submit an order,

8 and an ILEC such as BellSouth can take that information,

9 could manually rekey that and process it for their

10 systems for the provision of that service.

11   Now branch off the other side, and you have to

12 deal -- if you've got the content standards established,

13 let's talk about how do you electronically exchange this

14 information. The electronic exchange is what gets under

15 the TCIF, and the TCIF has a subcommittee under that,

16 ECIC, that really drives this. That's the Electronic

17 Communications Implementation Committee. There are some

18 other committees. There's a committee, just an EDI

19 committee.

20   But under ECIC, there are two subcommittees

21 further of that. One that deals with the standard they

22 have established for EDI and one that deals with the

23 standard that they have established for CORBA. That gets

24 with how do you take that OBF-content information and do,

25 you know, data layout for the electronic exchange of that

1 information.

2   Q   All right. Thank you.

3   Now there are the national standards, and then

4 there are -- I think LENS is a standard -- is a system

5 that is not within the national standard; is that

6 correct?

7   A   That is correct.

8   Q   Is it BellSouth policy to try and follow the

9 national standards? And you were talking earlier about,

10 well, you don't want to get ahead of the national

11 standards by developing a system, but surely at times you

12 actually do as a result, like the LENS?

13   A   Well, LENS, you've got to look back at the

14 history of LENS. I heard two questions first. One was

15 tell me a little bit about LENS, how that got

16 established, and tell me what your policy is with respect

17 to following the standards. So let me deal first with,

18 if I can, and correct me if I've misheard your question,

19 what is our policy associated with the development of the

20 systems and the standards.

21   BellSouth's policy is that we're going to

22 develop systems that are standards based, coming out of

23 those committees I described, where there is an interest

24 expressed for that by our ALECs. So the committee could

25 develop something that no one has any interest in. They

1 could be down the path so far that they don't want to go

2 that route. But if there is interest, then we'll work

3 and develop that as long as it's standard based.

4   Now LENS you've got to go back and look at the

5 Telecommunications Act in time when it's put in place and

6 where we all were. LENS was our first attempt at trying

7 to develop a system that could do the most basic easy

8 transaction, which is conversions of accounts from

9 BellSouth to the ALEC. That's really its core base, and

10 we have continued to develop and evolve that so that it's

11 a system that will be very user friendly, and

12 specifically oriented towards the smaller ALECs that

13 don't want to develop their own internal OSS systems.

14 And that's why you have a lot of people -- a lot of ALECs

15 that fall in that category today. For whatever reason

16 their business plan is, they're not going to have a major

17 IT investment. So for LENS all you've got to

18 essentially have is a PC with the appropriate, you know,

19 configuration, an Internet browser software, and you

20 connect right to the Internet, and you can do

21 transactions via LENS.

22   Q   All right. Does LENS support the ordering

23 functions of preordering and ordering?

24   A   It supports preordering and ordering for

25 resale.

1   Q   And does EDI support the functions of ordering,

2 provisioning for simple resale services, and seven

3 unbundled network elements?

4   A   That is correct. For clarification, there is

5 no preordering with EDI. It's all the ordering.

6   Q   And did EDI become available around December

7 31st of '96?

8   A   That sounds right. I don't have the date

9 exactly in front of me, but it's been there for some

10 time.

11   Q   And the ordering function for TAG, the

12 functions TAG supports would be preordering, ordering,

13 provisioning for simple resale services, and seven

14 unbundled network elements?

15   A   That is correct.

16   Q   And TAG became available, subject to check,

17 November 1st of '98?

18   A   That is correct for the ordering

19 functionality. It was, I think, August 31st for

20 preordering.

21   Q   When BellSouth updates its OSS, its systems --

22 OSS systems, such as EDI to TAG, how long does BellSouth

23 support the previous version?

24   A   We will support that previous version until we

25 roll out another version. Let me describe that. Let's,

1   for sake of simplicity, say we have Version A and Version

2   B in place today. Now, once again, these versions are

3   being driven through ATIS. This is not BellSouth's

4   discretionary version. This is what's driven through

5   those standards that are established.

6   So when a new version comes out, let's say now

7   we've got Version C, what we do is, Version C is the

8   version that we support and maintain, meaning that we'll

9   be doing enhancements to. Version B we freeze, meaning

10 we just support it. And then that Version A, which was

11 the initial one in the scenario I described, that drops

12 off from support. The concept there being, this allows

13 an ALEC who is trying to get to the most recent version

14 plenty of time to do so, as we continue to develop

15 enhancements for that based on the standards.

16   Q   Do you provide any notice that you're starting

17 to develop a new version of something?

18   A   Oh, yes. When there's a brand new version,

19 there's months of notice. And understand, you heard a

20 little bit -- Mr. Varner touched on it yesterday -- the

21 Electronic Interface Change Control Process by BellSouth,

22 all this information is thoroughly communicated, and this

23 is a body that is made up, not of just BellSouth. It is

24 participating ALECs. Not only are they aware, based on

25 that participation, they can have input and drive the

1   prioritization of what they want to see in those releases

2   based on the standards that are rolling out.

3   For example, you may have -- well, we have a

4   situation right now. We have a major release that will

5   come out, I think the date is December 18th. That

6   release incorporates the TCIF versions, back to the

7   standards now, 8 and 9; and they, as a body, decided they

8   didn't want all of everything. They picked: What did

9   they want? What did the ALECs want on that that would

10   best help them? At the same time we are participating --

11   we have a vote and say in this that helps us. So they've

12   got the best of those versions to bring it up. I think

13   the way it ends up incorporating, don't hold me to this,

14   all of 8. Essentially, it will be only TCIF Version 9

15   when that's in, but not all of 9.

16   Q   So based on functionality, is it correct to say

17   that TAG encompasses all of the functionalities of both

18   LENS and EDI?

19   A   Yes.

20   Q   And does BellSouth use LENS, EDI, or TAG for

21   OSS with their own customers?

22   A   No, those are systems explicitly designed

23   solely for the use of the ALEC community.

24   Q   I think in your direct testimony, Page 4,

25   beginning at Line 14, you state that BellSouth provides

1 an integratable standard by which ALECs may integrate

2 their own OSS; therefore, ITC^DeltaCom must develop a

3 BellSouth compatible OSS along with their own internal

4 OSS. Both BellSouth and ITC incur costs for development

5 and implementation of their internal and compatible

6 external OSS; is that correct?

7   A   Can you refer me back to that, in my testimony?

8   Q   Direct, Page 4, Line 14.

9   A   I don't see it there. Was it possibly the

10 rebuttal?

11   Q   We can certainly go there.

12   A   You could have a different paging based on how

13 yours printed out.

14   Q   Let's try your rebuttal.

15   A   Start the statement again. I'll see if I can

16 find it here.

17   Q   It's the, beginning -- the last word of Line

18 14, "BellSouth provides integratable, national standard."

19   A   Yeah, I found it. I'm there with you. Yes.

20 Now what was your question?

21   Q   My question is: Do both BellSouth and

22 ITC^DeltaCom incur costs for development and

23 implementation of their own internal and then a

24 compatible external OSS?

25   A   For their own internal, are we talking about

1   the internal here for specifically serving the ALEC

2   community, or are you talking about for BellSouth?

3   Q   Well, would you agree that ITC incurs costs to

4   develop its own interface with the OSS systems?

5   A   Oh, yes, most definitely, and that's really the

6   intent of establishing national standards, so that they

7   can develop their own system and use it to drive whatever

8   their particular business needs associated with their

9   mission, their vision, where they're trying to go, and

10 then have the ability to exchange that information with

11 what BellSouth has developed for receiving and processing

12 their orders.

13   Q   I'd like to sort of create a hypothetical where

14 you have -- instead of BellSouth, you know, being the

15 monopoly and moving in, but let's say we had two

16 monopolies within a particular area and BellSouth had 50%

17 of the market and ITC had 50% of the market, and it's

18 divided geographically, and competitive access has been

19 ordered.

20   A   So this means we're in long distance as well,

21 right?

22   Q   Sure, we can go with that.

23   A   Okay.

24   Q   In order for the two companies to gain access

25 to each other's customers, would you agree that an OSS

1 would have to be developed between the two companies?

2   A   For them to gain access to each other's

3 customers. Yeah. I mean that's what the whole Act is

4 driving, is for that to be developed so you can exchange

5 that information.

6   Q   Would you agree that each of the companies

7 would have to bear their own cost in order to develop the

8 OSS systems that they developed in order to reach each

9 other's customers?

10   A   Ask me the question one more time, please.

11   Q   Would you agree that each company, BellSouth

12 and ITC, would both have to incur costs in developing

13 their OSS systems to gain access to each other's

14 customers?

15   A   Yes, there's definitely cost associated, so

16 there would be a cost incurred.

17   Q   And would you agree that each company should

18 bear its own cost?

19   A   No, not necessarily. Now you're also going

20 down the path with cost questions, and once again, I'm

21 going to state, I'm not the cost witness, so I can't get

22 into the specifics. But the scenario you painted, an

23 ideal scenario, is not the environment which we're

24 dealing with so --

25   Q   But we want to deal with this environment.

1   A   Okay, so in that environment, the only way that

2 there would be any cost incurred and borne by each

3 individual company, organization, regardless of what the

4 industry is, where there is not any type environment

5 that's forcing them to share that information; and that's

6 not what we're dealing with today.

7   Q   Okay. I'd like to refer to your exhibit. It's

8 RMP-1, Page 2, and I think we've been there. At the

9 LESOG an order from a CLEC faces three verifications

10 before it would flow through to SOCS; is this correct?

11   A   At LESOG there's three decision points of

12 verification before it's going to flow through, yes.

13   Q   And the first verification is a manual

14 processing fallout; is that correct?

15   A   Yes, that's where we were talking earlier that

16 if the functionality has not been programmed to accept

17 that type of order, it by design falls out. It's not a

18 system -- a deficiency. It by design falls out to be

19 driven for entry by the representatives in the local

20 carrier service center.

21   Q   All right. And that would be M, and M takes

22 you to the LCSC; is that correct?

23   A   That's correct. That's the Local Carrier

24 Service Center.

25   Q   And I think we discussed the parameters where

1 these orders fall out for manual processing. There was

2 hunting. We weren't sure about hubbing, but there were

3 PBX trunks and synchronet services; is that correct?

4   A   Yes, and there's another one that escapes me at

5 the moment.

6   Q   Okay.

7   A   There are four specific complex orders today

8 that fall out by design, so -- There are other things

9 that could fall out here as a result of this, but that's

10 the primary category. Others, for illustration purposes,

11 is if you submit a Local Service Request and there's

12 another order pending, the system will say there's

13 another order pending, and it will force it to fall out

14 so the representative can look to make sure there's not

15 some duplication, double submission, so forth.

16   Q   Do you know if there are any plans to -- or if

17 there will be a release that will allow any of these four

18 categories of manual orderings to flow on through?

19   A   Oh, yes, definitely. This gets back to the

20 standards, once again. Let me use hunting as a perfect

21 example. Hunting will be programmed in the release

22 that's coming out in December. This is two-fold. I mean

23 the standards evolve to allow us to define it so we can

24 program that functionality, and there's also been a big

25 demand, and we understand the demand, associated with

that from our ALEC community. So this is one of those

double wins for everybody.   It's a win-win situation.

It's going to be of significant value to ITC^DeltaCom

because a very large percentage of their orders that fall

out as a result of that hunting feature. They use that

for their customers, which is a common feature that

business customers want.

     Q   All right. Thank you.

          Do you recall testifying in your deposition

that substantially the same time and manner describes a

process that defines how you order and provision

services, for example, would be similar for the retail

unit as it would be for the ALEC community, and from a

time standpoint, you're talking about the actual time to

provision that service would be about the same

approximate time as well?

     A   Yes, I recall that discussion.

     Q   In that, are you talking of resale services or

unbundled elements?

     A   Well, resale service is the primary thing, but

there is a component applicable to unbundled elements;

but you've got to recognize, once again, we don't order

unbundled network elements for ourselves, so there's a

different standard, a standard that the FCC has applied,

and that's what we discussed in that situation. The

1   standards for substantial same time and manner really

2   drives directly back to the resale, and then for

3   unbundled network elements, it's to allow an efficient

4   competitor with the ability to compete.

5   Q   All right. Now you said that there's some

6   element -- some unbundled elements in there, some

7   components of unbundled elements within that description

8   that you were talking about. You said it primarily dealt

9   with resale services, but there were some components of

10   the unbundled?

11   A   What I'm trying to say there is that this

12   process that you see also is applied to how you would

13   order an unbundled network element. But when you deal

14   with the same time and manner, you can't necessarily draw

15   that direct correlation because we are now ordering

16   something that BellSouth does not do for itself.

17   Q   All right. So BellSouth would not have any

18   retail analogs for UNEs; is that correct?

19   A   That is correct. That is correct.

20   Q   You also testified in your deposition that

21   BellSouth has provided ALECs three OSS interfaces for

22   submitting --   Well, strike that, I'm sorry.

23   Beyond TAG do you know if there are any other

24   OSS interfaces in the works?

25   A   No, there are no others currently in the

1 works. There was, at one point in time, a different

2 standard pursuit at the request of one ALEC, and that

3 ALEC has abandoned that request.

4 Q You also testified in your deposition that

5 BellSouth's DOE systems can process complex orders when

6 the complex orders are entered as sales service order

7 format; is this correct?

8 A That is correct.

9 Q Can BellSouth reconfigure the sales service

10 order format that enables the downstream processing of

11 complex orders for ALECs used with the existing OSS

12 interfaces?

13 A The answer is what we've been talking about.

14 It gets back to the standards for taking that information

15 that's provided in that LSR format, so you've got to get

16 the content definition again. That's driven up by OBF.

17 Then you've got to get the electronic standards process

18 driven by that ECIC committee under TCIF, and then that

19 functionality can be programmed; and that's the constant

20 evolving process.

21 Q Thank you.

22 In Mr. Thomas's deposition, Mr. Thomas

23 testified that ITC will need the capability for error

24 checking in its preordering functions and not necessarily

25 the fuel or SOLAR systems. Which of BellSouth's OSS

1 interfaces has the capability for error checking while in

2 the preordering mode, or does it?

3   A   It's not preordering mode that, I think,

4 Mr. Thomas is referring to. He needs to speak for

5 himself, obviously, but let me just wrap my words around

6 that.

7   What I hear the reference being made to is

8 maybe getting the information in the preordering. That's

9 what preordering is all about, getting the necessary

10 information to place the order, and then having that

11 information loaded in the order itself so that when

12 that's transmitted, it goes -- it's a complete and

13 accurate order. So what we're referring to is what edit

14 checks could you do up front before you ever send it over

15 to BellSouth to improve your overall accuracy and

16 completeness of that order. And that's what, I think,

17 he's referring to; but, once again, he would have to

18 speak for himself.

19   Q   Okay. Thank you.

20   Also Mr. Thomas in his direct testimony,

21 Mr. Thomas testified that BellSouth defines flow-through

22 for itself to include preordering functions. Then on

23 Page 11, and we can go to those, I can give you the

24 cites, Mr. Thomas further testified that BellSouth

25 defines flow-through for ALECs to start when the complete

1 and correct electronically submitted LSR is sent via one

2 of the ALEC ordering interfaces. All right. Do you

3 agree with Mr. Thomas's representation of these two

4 definitions of flow-through?

5   A   Would you please give me the cite, so I can go

6 directly to it?

7   Q   Page 10, Lines 19 through 23.

8   A   This is of my direct testimony?

9   Q   I'm sorry, Mr. Thomas.

10   A   Because I know he referenced a cite in my

11 testimony as well, but let me go to Mr. Thomas. Page 10.

12   MR. ADELMAN: I think it's the rebuttal

13   testimony you're probably looking at, Ms. Caldwell.

14   MS. CALDWELL: Okay.

15   WITNESS PATE: All right. I'm on Page 10 of

16   his testimony. Which lines?   His rebuttal

17   testimony.

18 BY MS. CALDWELL (Continuing):

19   Q   19 through 23.

20   A   Let me read that, please.

21   (WITNESS REVIEWED DOCUMENT)

22   A   No, I think Mr. Thomas -- I disagree with this

23 statement, first to answer your question, and I think

24 he's just confused. He's read a little bit more into a

25 statement that he referred to in my testimony. Maybe I

1   need to better write it for clarification purposes.

2   What we're saying here -- we're not trying to

3   imply that our definition of flow-through is while our

4   reps are on the line with a customer, they're taking the

5   information and inputting it. Now I don't want to

6   mislead you. We have reps that can do that, but many

7   situations you can't, particularly the type of services

8   we're dealing here primarily with ITC^DeltaCom. They

9   have to gather that information as well. And, once

10   again, they're using a DOE system which is direct entry

11   into the sales service order format so that it's not a

12   flow-through issue. You're entering it directly into

13   that format. But we have to gather information. What my

14   statement for flow-through comparison purposes is trying

15   to say, is once it's entered, so you may get information

16   from the customer, but that could be one event. The

17   second event is entering it into the system.

18   Q   All right. Would you also look on Page 11,

19   Lines 3 through 5?

20   A   Mr. Thomas's rebuttal?

21   Q   Yes.

22   A   All right.

23   (WITNESS REVIEWED DOCUMENT)

24   A   Yes, I've read that.

25   Q   All right. And my question is: Where is the

1   preordering function for the ALECs' flow-through?

2   A   Well, it's a separate event. Preordering. Now

3   a separate event from the standpoint you've got to gather

4   the information. There are some opportunities from a

5   technical standpoint to try to make them one and the same

6   event, but you've still got to do it before you submit

7   the order. You've still got to gather it. So let's talk

8   about what we're referring to. RSAG, for example, that's

9   a database that you have to access to get the validation

10 of the address associated with where you're trying to do

11 that installation or change. That information is a

12 preordering information you're going to retrieve, and

13 we're talking about now getting that information

14 retrieved and loading that information into the order

15 itself. That is preordering. Once you got it in the

16 order, once you click that button and you have everything

17 else that you've gathered from a preordering standpoint,

18 that becomes the order. So those are separate events.

19 Sometimes you can electronically do them the same.

20 That's one of the things we are talking about TAG itself.

21 The preordering functionality of TAG, use that for

22 illustration purposes, you can get that address

23 information from RSAG that I just described, and you can

24 program your systems to pull that in so that it populates

25 your LSR format order, and you don't have to rekey any of

1 that.

2 Q   How would you define flow-through for orders

3 that are designed to fall out?

4 A   They don't flow through. They're not a part of

5 the mathematical derivation of the flow-through results.

6 They fall out by design. Now the other category of

7 fallout though is those that fall out due to errors.

8 Let's go to my exhibit, if I may, to use that for sake of

9 clarification purposes. Again, I'm on my exhibit, Page 2

10 of RMP-1.

11 Q   Right.

12 A   And I'm in that block that's entitled LESOG.

13 Local Exchange Service Order Guide is what that stands

14 for.

15 Q   Okay.

16 A   That first category of M, as we've already

17 discussed, are those that fall out by design. So when

18 you talk about flow-through, they're not in the equation

19 for flow-through. They have fallen out for that reason.

20 The program does not allow them to flow through.

21   Then the other two decision points are really

22 types of rejects or errors. You have an auto

23 clarification. That's where the system itself identifies

24 an error and automatically sends it back electronically

25 via the same system submitted. And then you have the E

1 diamond that's here that refers to the errors. Those are

2 errors where the error has potential to be caused by

3 BellSouth or the ALEC, and as a result someone needs to

4 look at that and make that determination. Those errors

5 are the others that fall out, that E that falls out to

6 the LCSC. Those are a part of the derivation of

7 flow-through. If it's determined that it's a BellSouth

8 error, that means something is wrong with our system.

9 That did not flow through, and the equation reflects such

10 from its result.

11   Q   All right. Thank you.

12   We've been asking some questions, and they keep

13 referring us to you, so --

14   A   I have a lot of friends, what can I say.

15   Q   You can take it up with them later.

16   Could you -- We're interested in finding out

17 about the changes to the business rules and guidelines,

18 and so would you please define -- Are you familiar with

19 the rules and guidelines?

20   A   Oh, yes, most definitely.

21   Q   All right. So would you please give us the

22 definition of what the guidelines are?

23   A   The business rules and guidelines?

24   Q   Right, is there a different -- first just tell

25 me what the guidelines are?

1   A   Well, really we're talking one and the same

2   when you talk about business rules and guidelines. Let

3   me see if I can give you an illustration to show you the

4   finetunement of what might be different. A business rule

5   might be for directory listing that you would have to

6   have your data element formatted where you put your -- if

7   it's a residential listing, you put your last name. You

8   follow that with a comma. Then you'd put your first name

9   and middle initial. So for me it would say Pate, comma,

10 Ronald M. And that would drive how it appears in the

11 directory listing itself.

12   A guideline, for illustration, associated with

13 that might be you want to capitalize, you know, the first

14 letter associated with this. Or if you want special

15 listings, you want to italicize it, do this. That would

16 be a guideline. That's a distinction between a business

17 rule really and a guideline.

18   Q   Okay. Now are you familiar with BellSouth's

19 Web site where the posting of the business rules and

20 guidelines?

21   A   Certainly. I review it often.

22   Q   All right. Can you sort of give me the format

23 that you post these notices on?

24   A   Well, there's a -- I think it's entitled

25 Carrier Notification.

1   Q   Okay.

2   A   I can't give you the exact Web site. You could

3 easily bookmark that and drive you right to it.

4   Q   Right.

5   A   If you can't remember the bookmark, you can go

6 to the home page, and there are linkages to that. The

7 home page, for example, is

8 www.interconnection.bellsouth.com. I have it bookmarked

9 on my PC for that page is the reason I can't remember it.

10   Q   Okay.

11   A   And then it actually first lists the topics of

12 what the various notifications are, and then you can just

13 double click on that topic to actually see that specific

14 notification, and it's chronologically listed.

15   Q   Okay. So you have them in categories, and you

16 have them chronologically listed. Is there a time frame

17 in which the notice remains on the Web site for a

18 particular notice?

19   A   I don't think we've taken any off. There's --

20 Each year they sort of store it, but there's a link. If

21 you want to go see 1998 notices, I know you can easily

22 tap into that. I can't speak for '97, but I have gone

23 back into '98 for many times to just --- if I'm looking

24 for a particular notice that I know is there. So there

25 is some history that's there, and definitely the whole

1 year's worth of history stays on.

2   Q   Do you put from -- like the newest notice would

3 be coming up first, or is it posted last, or how is it

4 posted in order?

5   A   The most recent comes up first.

6   Q   Now how specific are these notices? Is it

7 something where you put the entire notice there, or is

8 there like a link that you would click on? It would give

9 a summary of the notice and then you could go to a more

10 detailed text of the notice?

11   A   Let me answer it this way because there are

12 different situations. If you're talking about a major

13 release, let's use the release that I referred to earlier

14 that's coming up. This is a very major release for us.

15 The term OSS '99 has commonly been referred to.

16   This release will be out December 18th; I think

17 I've got that date correct. Mid-December if I've missed

18 that date. The notification for that release has not

19 been posted to that Web site yet. Our policy is we try

20 to put that out there 30 days in advance. So you can

21 expect mid-November time frame that the notice is going

22 to be there stating that that release will be put in

23 effect such and such date. That's the official notice.

24   Now as I said earlier, the details behind all

25 that, what an ALEC needs to start doing their mapping,

1 their programming, their side of the interface. That's

2 been -- being provided and coming out under the

3 electronic interface change control process. So this is

4 just notice, here it goes. You've gotten everything else

5 you've needed really through another. That's one

6 situation.

7   Now the other situation I want to describe to

8 you is if something has been discovered -- You've heard

9 the term, I think Mr. Varner used "defect." If we have a

10 defect come out, that notice, as soon as we can correct

11 it and get it out to you. It may be a little bit more

12 lengthy. It may describe some details. Hey, this field

13 is now such and such, and you need to do this. There may

14 be more details behind that. Also, there could have been

15 some information still through the EICCP as well. But

16 that could impact exactly what's incorporated into that

17 notice.

18   Q   Okay. And then you would then also when you --

19 like within your notice, you would give the effective

20 date?

21   A   Yes.

22   Q   Effective immediately, effective on December

23 18th?

24   A   Well, it never says effective immediately. It

25 actually gives a date.

Q   Okay. All right.

COMMISSIONER JACOBS: Are you familiar with the example that was listed in Mr. Hyde's testimony where the one field was changed from having -- from allowing one, I think it was not allowed, or NA, to none?

WITNESS PATE: I think that was the LPIC example that he --

COMMISSIONER JACOBS: Okay. Which of those categories you just described would that kind of a notice fall into?

WITNESS PATE: That one would have been more detailed information, and that's a good one to discuss. That whole situation was driven by a regulatory, really; and as a result of that, the notice associated with being able to give it was not what we'd like to do, but it wasn't really within our control. We knew it was coming, but we didn't have the order to do it. It had been discussed. Carriers knew about it. I mean this was dealing with the one plus interLATA subscription. It didn't apply here in Florida, but it did in some of the other states, Louisiana, Tennessee and some others; but that's a regulatory driven. Those type of situations we can't always give the notice. And I

think you'll find -- even ITC^DeltaCom has said

they understand that. I mean that's reasonable.

However, sometime, like in that one, we had no

notice that we could give, and it resulted even in

BellSouth's retail units being disrupted.

COMMISSIONER JACOBS: Once a decision is made

that you're going to change the processing rules in

response to, let's say, an incident like that, the

notice that you send out, is it going to specify

that as of this date forward the new processing

rules will be this, and your orders will be kicked

out as a result of failing to adhere to that? Is

that the kind of notice that will go out?

WITNESS PATE: The notice itself would state

what the rules are, and the people that work with

this, they know the implication of that is, if you

don't change that on your side of the interface, the

order is going to be rejected. It will either come

back as an auto clarification. It may fall out in

that category of errors, or it may be -- usually

it's not, but it could just be rejected right up

front; but they understand that. I mean that's part

of programming systems, so they know if they don't

change their side of the interface, that mapping as

you've heard referred to, that it's going to be

1   rejected in some form.

2   COMMISSIONER JACOBS: Thank you.

3   BY MS. CALDWELL (Continuing):

4   Q   Are you familiar with the electronic interface

5   change control process?

6   A   Yes, ma'am.

7   Q   And that's the EICCP, correct?

8   A   Yes, ma'am another acronym for us.

9   Q   Now is the EICCP process an OSS, or part of the

10   OSS?

11   A   It's part of the OSS in that it drives what

12   functionality is being programmed into the OSS as well as

13   if we are going to develop new OSS.   That will be

14   discussed from that group, and they'll be aware.   It's a

15   formal communication process as well as participation

16   process for the ALECs to help drive all of this.

17   Q   Now, and you said it's a formal process and a

18   participation process.   Is notification of this process

19   via e-mail and discussions via e-mail?

20   A   It's on the Web site.   Let me, I --   Just for

21   illustration purposes, I'll just read from a typical

22   agenda of one of these meetings, so you can understand

23   what takes place there.   And once again, all of this is

24   on the Web site.   You can post --   There are links.   The

25   notice to the meetings are out there.   The meeting

1 minutes are out there, what they worked on. There is a

2 log out there, all there. But here is a typical

3 agenda --

4 Q Let me ask one question.

5 A Sure.

6 Q Is there a mailing list out there as well?

7 A It lists who the participants are on the Web

8 site, so that would be what drives the mailing list.

9 Q Okay. Go ahead. I'm sorry.

10 A But here's an agenda for a September 28th

11 meeting, so it just took place recently. The first was a

12 change request log status, was the topic. This is the

13 change request that the ALECs have submitted, what the

14 status of those are. Regulatory issues, they discuss any

15 regulatory issues out, how that's going to impact OSS.

16 Release management and implementation status, they

17 discuss the releases that are underway, when they're

18 going to come out, their status, how it's going to be

19 impacted for implementation purposes. They have what

20 they call an initial prioritization voting. This is

21 where the CLECs and ALECs vote on how they would like to

22 see these changes prioritized so they can have a voice in

23 this. And then they actually have a presentation of

24 change requests the ALECs are submitting. So you can see

25 this is a very participating type process to drive what

1 we need to do in the OSS to better serve our ALEC

2 customers.

3   Q   Okay. Are you aware that ITC^DeltaCom has

4 requested being contacted for all the notification

5 changes that appear on your Web site through an

6 individual e-mail?

7   A   Yes, I am.

8   Q   Is it not possible to create like a mailing

9 list that you have for this, what is it, EICCP guide, to

10 create one also for your notice?

11   A   It's technically possible to do that. There

12 are a lot of issues associated with it. Mr. Varner

13 touched on most of those, I think, yesterday. But just

14 for sake of discussion again, the concern here is making

15 sure that everyone gets notice, and that the notice is

16 definitely the issue of nondiscriminatory notice. When

17 you start dealing with electronic mail, you probably have

18 personally experienced situations where you don't get

19 something someone said they sent to you, or due to

20 electronic systems, the way they speak with each other,

21 you get it far, far after when it was sent, and there can

22 be all sorts of issues. There's also the issue of

23 administration of that, how many times have you built a

24 distribution list yourself, sent it out to get a lot of

25 rejects back saying that person is no longer here or

1 something is wrong. So all those issues come into play.

2 Whereas, the current process is well defined, and it

3 works. And the notice is posted out there. Everybody

4 knows where it is, easy to get to, easy to review. As

5 far as I know, ITC^DeltaCom is the only ALEC that's

6 requested it any other way.

7   Q   Are you also familiar with the BOCRIS system? I

8 think it's -- and BOCRIS is an acronym?

9   A   Yes, uh-huh.

10   Q   Will you tell me what the acronym means?

11   A   I think the BO, the B-O, is Business Office;

12 but the other is definitely the Customer Record

13 Information System.

14   Q   All right. And could you tell me a little bit

15 about what the BOCRIS does?

16   A   Well, BOCRIS does many things. That's really

17 where you get all the information associated with the

18 customer service record, but there's a lot of other

19 information there too. It's really the --

20   Q   A very large system.

21   A   Yes.

22   Q   Let me narrow it down then.

23   A   Okay.

24   Q   Is it a system that BellSouth uses for its

25 customers?

1   A   Yes, it is.

2   Q   Does it include repair requests from the

3 customers?

4   A   No. No, it's not a system for repair

5 requests. Now the TAFI system will access it as part of

6 its diagnostics associated with trying to understand and

7 isolate what the trouble is; but it is not a, shall I

8 say, a repair and maintenance system.

9   Q   Okay. Does it detail information as far as

10 time and materials and labor charges for repair systems?

11   A   No, it does not detail. Now if you're

12 referring to that, the entry of time and material charges

13 into BOCRIS so that that's what drives to bill, that's

14 how BOCRIS -- it's one of the things it does.

15   Q   Okay. That's what I need to know.

16   A   Okay.

17   Q   And does the BOCRIS -- so that entry goes into

18 BOCRIS and the time and material -- the labor, time, and

19 materials is processed through the BOCRIS system?

20   A   Let me describe the whole process associated

21 with any charge incurred for a repair. This is one of

22 those areas where I need to lay a foundation a little bit

23 first. First off, you're dealing with an extremely small

24 percentage of transactions. The bulk of any repair work

25 done is covered under the monthly recurring charge

1 associated with being a subscriber to the service. We're

2 talking about those unique situations where that is not

3 covered.

4   What typically happens a lot with an ALEC, most

5 of the situations where they incur any charges, where

6 they insist that we dispatch a technician on a trouble

7 only to find out that the trouble is beyond our

8 demarcation point. For example, it's in their inside

9 wiring and they don't have the inside wiring plan, or

10 it's in their premise equipment itself. They're

11 responsible for that.

12   So as a result of that dispatch of the

13 technician, and they know this up front when they ask us

14 to dispatch, if we come back and the trouble isolation

15 finds that, they will be charged for the time of that

16 technician. Obviously no material involved there.

17   Another scenario that's common is when they ask

18 for specific work to be performed. It could be for a

19 repair. It could be for an installation. If they want

20 to have several jacks rearranged or installed or for some

21 inside wiring. That's not covered under your monthly

22 recurring charge, so that would result in a time charge

23 as well as a material charge.

24   Q   And would it be technically feasible in using

25 the BOCRIS system to provide an itemized time and

material charge from -- or to generate an itemized time

and material charge from the BOCRIS system for a specific

ALEC?

A   Yeah.   It probably is technically feasible.

It's just a programming issue.   Let me say that it's not

the way we do it for ourself.   Right now, what is driven

in BOCRIS for any time and material charge that is

incurred, is the exact same thing that's driven, exactly,

to a BellSouth's end-user customer.   It gives you a

line-item description and the total dollar amount in the

exact same words as we have for our own retail units and

used it for years.

Q   All right.   Now when you produce this for

yourself, is it for the end customer, like the end user

that's just the residential customer that comes out?

A   Yeah, exactly.   Let me take you one step

further to understand this.   The BellSouth technician

fills out a form.   It's called an RF-141 or RF-1356.   This

form is completed describing what they did.   Really they

don't do much description.   There are codes on the form,

and they just essentially click off that code, a check

mark by that code, and then they enter the dollar

amount.   Now the dollar amount they enter, those are

dollar amounts that are in the tariff.   So this is

nothing that's driven just at the discretion of

BellSouth. These are tariffed dollar amounts, and the

ALECs have access to this tariff.

So based on then -- the BOCRIS entry, all the

representative does that's entering that into BOCRIS is

they take that code that's on that form and enter that

code, and they enter that dollar amount. And that

drives -- you don't see the code on the bill; you see the

actual, a description of that dollar amount.

So with a little bit of understanding of the

various things that they could do -- There's not that

many. Work could easily be developed where anyone with

ease could interpret that bill. You're looking at less

probably -- I'm guessing here a little bit, but I have

some data to formulate this guess, less than 3%, if not

2%, of all the transactions for repair and maintenance

that result in any type of a charge like this.

Q   So now my next -- when you provide ITC with

this, is it broken down by customer as far as the amounts

being charged to that customer, or do you just give a

lump sum to ITC for the itemized materials and labor

charges?

A   No, it's broken down by customer. When they

enter into BOCRIS, they have to enter the phone

number --

Q   Okay.

1   A   -- which drives it to that customer's account,

2 and then they enter that code, and the other thing they

3 enter is the dollar amount.

4   Q   All right. And you're saying that ITC could

5 then go to the tariffs and be able to break it down as

6 far as itemized material charges and labor by looking at

7 the different tariffs?

8   A   No, what I'm saying is for the bulk of them

9 there's not going to be a material charge. Most of these

10 are just one-time site visits, and there's a per-visit

11 charge. Easy, a little bit of training, for us to help

12 them better understand the bill, to be able to make that

13 correlation. Then for the extremely small, probably less

14 than a half percent, if that high, of those where there's

15 a material charge, they could tell by the code and

16 description that there is potentially a material charge

17 or a breakdown of time charge, because it's more used to

18 an hourly rate; and there's a process through the billing

19 inquiry that they could get those details, just like we

20 use internally for ourself.

21   Q   Okay. Thank you.

22   MS. CALDWELL: That's all I have. Thank you

23 very much.

24   COMMISSIONER CLARK: Commissioner Jacobs.

25   COMMISSIONER JACOBS: Going back to the issue

1   of fallouts.

2   WITNESS PATE: Yes, sir.

3   COMMISSIONER JACOBS: Were you here for

4   Ms. Caldwell's testimony when she indicated that in

5   the event of a fallout there may be some overhead

6   that gets attached to that LSR in terms of cost?

7   WITNESS PATE: I was here. You'll have to

8   refresh me. Ms. Caldwell was one of my friends that

9   gave me several questions.

10   COMMISSIONER JACOBS: As I understand it, when

11 an LSR falls out of the process, there is some cost

12 associated with that that may attach to that LSR.

13   WITNESS PATE: Yes, sir, there is. The

14 specifics of that cost, she would have to speak to,

15 but --

16   COMMISSIONER JACOBS: Okay. My question would

17 be these complex orders.

18   WITNESS PATE: All right.

19   COMMISSIONER JACOBS: Do you know if that

20 overhead gets attached to them?

21   WITNESS PATE: I'm sure that's part of her

22 study, but the way we treat it, as far as the

23 complex orders -- Let's break them out into two

24 categories now. You have the complex orders that

25 we've described that you can submit electronically,

which I think is what you're referring to, and they

fall out.

COMMISSIONER JACOBS: Right.

WITNESS PATE: And then there are those that

you cannot submit electronically. You have to do it

manually.

COMMISSIONER JACOBS: Right.

WITNESS PATE: If you submit it electronically,

the rate that's charged to you is that electronic

rate, three and a half dollars or whatever it is,

and that's part of her study that she would have to

speak as to how that's derived.

COMMISSIONER JACOBS: So it doesn't -- if then

it gets into the process and you have to enter it

manually into the DOE --

WITNESS PATE: That's correct. That's correct.

COMMISSIONER JACOBS: -- it stays as an

electronic LSR?

WITNESS PATE: For the way -- from that charge

for the transaction, yes, we treat it as electronic.

And, you know, over time as the standards evolve --

I mean our goal, of course, is to reduce that number

considerably over time as the functionality is

programmed as a result of evolving standards from

OBF as well as that ECIC committee.

1   COMMISSIONER JACOBS: Okay. You indicated

2 that, and I think I had it correctly, that for

3 BellSouth you have little, if any, preordering that

4 occurs?

5   WITNESS PATE: No, I didn't mean to imply we

6 have little or no preordering. We have the same

7 amount of preordering --

8   COMMISSIONER JACOBS: And that's what happens

9 under RNS?

10   WITNESS PATE: Well, RNS is the consumer system

11 now, and then the DOE for Florida is the business

12 system. You've got to separate those two totally.

13   COMMISSIONER JACOBS: Okay. That was exactly

14 the clarification I was looking for.

15   Does -- and this came up during the discussion

16 of flow-through.

17   WITNESS PATE: Okay.

18   COMMISSIONER JACOBS: So it would sound like

19 for BellSouth your representative would enter a

20 business order directly into DOE; is that a fair --

21   WITNESS PATE: They enter it using DOE, which

22 goes directly into SOCS. That's the service order

23 --

24   COMMISSIONER JACOBS: Which generates the

25 service order?

1   WITNESS PATE: That's where provisioning

2 starts.

3   COMMISSIONER JACOBS: Okay. Now, and my

4 question is, is there a -- would there be a prospect

5 that that order henceforth would potentially be

6 rejected for errors?

7   WITNESS PATE: Yeah, there are some downstream

8 errors. It's applied at that point in time to our

9 order, the same way it would be applied to an ALEC

10 order, but there are some potential additional edits

11 that could cause that order to come back. But the

12 bulk of edits, to make sure all the information

13 there is accurate and correct, should have been put

14 in right up front by putting it in the sales service

15 order format.

16   COMMISSIONER JACOBS: Okay. In the event of --

17 the unlikely event that that does occur, it's going

18 to get modified by your customer representative at

19 that time, it's not going to flow back through any

20 other process other than DOE?

21   WITNESS PATE: Are you saying if it comes back

22 as an error it could be modified?

23   COMMISSIONER JACOBS: Right.

24   WITNESS PATE: Sometimes the rep has to do it.

25 Frankly, sometimes the system can do it itself.

1 COMMISSIONER JACOBS: Okay.

2 WITNESS PATE: But if it has to have manual

3 intervention, it would come back to that rep, yes.

4 COMMISSIONER JACOBS: And you don't know what

5 percentage of time that would be, that manual

6 intervention is going to be required?

7 WITNESS PATE: Small. It's really small, and

8 understand that order at that stage is being

9 processed exactly the same for the retail side of

10 BellSouth as it is for the ALEC.

11 COMMISSIONER JACOBS: Okay. There was a

12 number, and I just had it in front of me, in your

13 diagram in your exhibit from the LEO box.

14 WITNESS PATE: All right.

15 COMMISSIONER JACOBS: And it points to fatal

16 rejects of some number. First of all, these numbers

17 are annual numbers?

18 WITNESS PATE: No, those numbers actually, if

19 you look at the first page of this exhibit, that's

20 an excerpt from a report that's posted monthly out

21 to the ALECs. This is one of the -- you've heard

22 referred to as the measurements we have, our SQM,

23 Service Quality Measurements. This report is one of

24 those measures, and actually a couple of different

25 individual measures drive from this particular

report. This was an excerpt. You can see, just for

clarity purposes, the name, and then it has numbers.

These are individual CLECs, and obviously, the

information is proprietary to them. So the way we

post this is by putting a code, and we scramble them

each time so they're never in the same order.

COMMISSIONER JACOBS: I see.

WITNESS PATE: So if you can see, I go 1

through 10 and then there's huge break from 124 to

133. All I was trying to do was capture the

beginning and the end. So all of the numbers that

you have on Page 2 are driven from those bottom-line

totals down at the bottom of that report --

COMMISSIONER JACOBS: Okay. I see.

WITNESS PATE: -- to illustrate how this works

and really to provide a mathematical illustration of

the derivation of the flow-through result.

COMMISSIONER JACOBS: Now so is this -- so on

this particular report, the total of rejects is 43

for LENS?

WITNESS PATE: Let me pull out this page so I

can have them side by side. If I heard you

correctly, you were focused in the second block of

the LEO and you were interested in the fatal

rejects?

1   COMMISSIONER JACOBS: Actually, I was -- yes,

2   you're correct. Yes, you are correct.

3   WITNESS PATE: Okay. If you see that map of

4   7,264 by the arrows up above that little two block,

5   go back to page one and come down that column that's

6   labeled -- it's actually the third column from the

7   left, fatal rejects.

8   COMMISSIONER JACOBS: Right.

9   WITNESS PATE: And go all the way to that

10   bottom figure.

11   COMMISSIONER JACOBS: Right.

12   WITNESS PATE: You'll see that 7,264.

13   COMMISSIONER JACOBS: Okay. I understand.

14   WITNESS PATE: And the rest of the numbers and

15   illustrations, what I'm doing is trying to pull it

16   from that report -- I'm not trying. I am pulling it

17   from that report to illustrate how that works.

18   COMMISSIONER JACOBS: Okay. I understand. And

19   so that I can try to get the question to the same

20   level as I asked about the BellSouth process, so

21   then you go through LEO, you go to LESOG, and then

22   you come out of LESOG with a service order request?

23   WITNESS PATE: It's in the service order format

24   into SOCS; is that what you're referring to?

25   COMMISSIONER JACOBS: Right.

1   WITNESS PATE: Yes, uh-huh.

2   COMMISSIONER JACOBS: Right. Now then that

3   seems to be some number of orders that come out

4   of -- that are service order requests that are put

5   into DOE here, but then -- and I'm looking at this

6   blue line for CLEC calls, fallout errors. In other

7   words, there seems to be some number of CLEC calls

8   errors that go back outside of DOE.

9   WITNESS PATE: Which one are you referring to,

10   which particular line so I can go there?

11   COMMISSIONER JACOBS: This 6, this line that's

12   attached to the Item 6 there on your diagram.

13   WITNESS PATE: Okay. So you're looking at the

14   dotted line?

15   COMMISSIONER JACOBS: Right.

16   WITNESS PATE: What we're saying -- let me back

17   you up for illustration purposes. If you

18   go back to that diamond which has an E in it, we're

19   saying that there are errors at this stage of the

20   processing of the local service order request that

21   have to be reviewed because the system cannot say:

22   Is that error as a result of something the CLEC --

23   ALEC did, or is it something as a result of

24   BellSouth's systems? So all of those errors, in

25   this case 12,016, go back to the local carrier

1   service center. The local carrier service center,

2   the representatives themselves, then decide which

3   ones were a result of the BellSouth system and which

4   one was a result of input from the ALEC. If it's

5   ALEC input, that dotted line is trying to signify,

6   which matches back with the report, that in this

7   case, 6,574 were sent back to the ALEC for

8   correction.

9   COMMISSIONER JACOBS: I see. And they never

10   really got into DOE, and the other ones did?

11   WITNESS PATE: That's correct. And the others

12   we correct and enter it directly into DOE because

13   we're saying it's the result of something of the

14   BellSouth system.

15   COMMISSIONER JACOBS: I see. I think that's

16   it. Thank you.

17   COMMISSIONER CLARK: Redirect.

18   REDIRECT EXAMINATION

19   MR. GOGGIN (Continuing):

20   Q   Mr. Pate, I just have a few questions on

21   redirect. Mr. Adelman was asking you about, and I think

22   Ms. Caldwell asked you a bit about this too, and

23   Commissioner Jacobs, orders that fall out by design for

24   manual handling. How are those orders entered into DOE

25   in the case of an ALEC order?

1 A In the case of an ALEC order, the local carrier

2 service center representative takes the information that

3 was submitted and enters that information, as provided to

4 them, directly into DOE.

5 Q Manually keys the information into DOE?

6 A Most of it's manual --

7   MR. ADELMAN: Objection, leading.

8   COMMISSIONER CLARK: Mr. Goggin.

9   MR. GOGGIN: Fair enough.

10 BY MR. GOGGIN (Continuing):

11 Q Is the information -- Okay. How is that

12 information entered into DOE in the case of a BST order?

13 A Well, the information, they'll be able to

14 retrieve it electronically. They see the order

15 electronically, for the most part. There are some

16 situations where they may have to work from paper, and

17 they always work from paper if it's something that was

18 faxed to them. That's not what we're discussing here.

19 And then they will have to rekey that. The bulk of it,

20 most of it is actually rekeying it, looking at it

21 electronically and then rekeying it into another screen.

22 Q Ms. Caldwell also asked you about the

23 procedures for supporting the OSS interfaces that

24 BellSouth has developed for ALEC use. You mentioned

25 three systems, I believe, LENS, EDI, and TAG that are

1 currently in use. Are all three of these systems

2 currently supported?

3   A   Yes, they are. They're all three currently

4 supported.

5   Q   Does BellSouth plan to continue to support both

6 EDI and TAG?

7   A   Most definitely. EDI is, as we've already

8 pointed out, is a standard-based system; and for that

9 reason --   We have multiple users. We have two, in

10 addition to ITC^DeltaCom, organizations that they have

11 said that is their way. That is the way they're going to

12 do ordering. That's the business decision they've made.

13 TAG is not meant to replace any of that decision. TAG is

14 another standard being developed to service those that

15 want to go via that route, and the two systems provide

16 all the same functionality. The main thing that's really

17 good with TAG though is a lot of the up-front edits that

18 we've built in there. We have all the up-front edits

19 built into TAG that mirrors those into all of BellSouth's

20 systems.

21   COMMISSIONER JACOBS: I'm sorry. Could I ask a

22   question real quick? I think I saw in your

23   testimony that TAG can be integrated with EDI.

24   WITNESS PATE: Yes.

25   COMMISSIONER JACOBS: It can just become a

1 front end to EDI?

2   WITNESS PATE: Yes.

3   COMMISSIONER JACOBS: Now I heard from

4 ITC^DeltaCom's witnesses that they didn't think that

5 was a good route to take, in other words, that TAG

6 would require them to redo their interface. What

7 are the reasons that you would propose simply

8 integrating TAG with EDI? What would be the

9 impediments in your mind as well?

10   WITNESS PATE: Okay. Well, it gets back to --

11 what BellSouth is trying to do, is we want to

12 provide the ALEC community with all the tools they

13 need to be successful for ordering and provisioning

14 so that they can better serve their customers, as

15 well as maintenance and repair; but we're

16 specifically here talking about ordering and

17 provisioning systems.

18   A big issue is, as you've heard Mr. Thomas

19 state -- and this is nothing unique to Mr. Thomas;

20 this is true throughout the whole community -- the

21 ability to take all that preordering information and

22 pull it into the order so that they don't have to

23 rekey. Now ITC^DeltaCom specifically, and others,

24 they've made some decisions, and they have made an

25 investment into this decision to use EDI as their

platform. So what we've tried to do through the TAG

is develop a system to where, since there's not a

preordering interface in EDI, is develop a system

that you can use that preordering component to do

what we just said, take that preordering

information. Use, for example, the RSAG. I mean

RSAG, the whole issue here from my understanding,

the reason they want a download of RSAG is so they

can do address validation on their side of the

interface because they are experiencing some errors

there. It's a common experience. It's nothing

unique to them because you've got to have that

address exactly like it is in RSAG. And for me I

live on 50 -- 51 Galatree Lane. I assure you,

that's not the way it appears in RSAG because that's

driven to how the facilities go there. And I've

looked at it before, but I've forgotten, but it has

some characters that no one would have dreamed

that's in there. So they need to have that exact,

or otherwise the order gets rejected.

COMMISSIONER JACOBS: I understand.

WITNESS PATE: So we're saying, okay, well, TAG

will let you do that. TAG will let you go, the

preordering functionality, get that information, and

even if you still want to use EDI, put it in that

EDI order. Now they would have to make a decision whether to totally via TAG and using the ordering functionality, but that's a decision they're going to have to make as they do their evaluation. But we provided them the system that they can continue to use the expertise that they have developed, the knowledge they have developed around EDI, at the same time, they're going to have to develop some knowledge and expertise using the CORBA standard with the TAG API.

COMMISSIONER JACOBS: And so that I'm clear, the CORBA standard will allow the TAG preordering to flow into the EDI provisioning?

WITNESS PATE: Yeah. The CORBA standard is nothing more than the way the information is transported, and then the TAG API itself deals with the functionality of taking that information and putting it -- it tells it how to get it and pull it to them. The combination of those two will allow you to drive that information then over to that EDI order. There is already another company -- obviously for proprietary reasons I can't say who it is -- they use EDI. They've made the investment, but they are using TAG for some preordering.

COMMISSIONER JACOBS: Thank you.

1 BY MR. GOGGIN (Continuing):

2   Q   You also discussed a bit about the TAFI

3 system. Is there an electronic interface for access to

4 the TAFI system?

5   A   TAFI is the electronic interface for access to

6 TAFI system.

7   Q   Okay. To clarify a bit about the other OSS

8 interfaces, do you understand whether DeltaCom has

9 developed OSS interfaces for its own use?

10   A   I can only base it on what Mr. Thomas has said,

11 and they talked about they've developed an ordering

12 system that's then customized to translate it into an EDI

13 format for receival -- for transmittal, shall I say, to

14 BellSouth.

15   Q   A minute ago you mentioned RNS. Has BellSouth

16 developed electronic interfaces for its own use for

17 access to its own OSS?

18   A   Oh, definitely. Each organization is going to

19 have to decide what am I in business to do, and based on

20 what I'm in business to do, how am I best going to do it.

21 Now what systems can I develop to help support me? RNS

22 has a huge marketing component associated with it so that

23 our retail representatives have marketing information

24 they need to help better service the customers. I'm sure

25 ITC^DeltaCom is going to do the same. I mean they're a

very professional organization, and they have a

sophisticated IT approach based on everything I've seen.

So it just make sound business logic and understanding

that they are developing a system that's unique to them

to serve them. That's their internal OSS.

Q   Has BellSouth developed OSS interfaces designed

for use by ALECs to access BellSouth's OSS?

A   Yes. Those were the interfaces that we've

discussed here, specifically for ordering and

provisioning, you know, the LENS, EDI and TAG; and it's

also then the necessary systems that it has to go through

for that conversion of that LSR format to the sales

service order format. Those specifically are LEO and

LESOG. And then, of course, we have developed TAFI. We

have taken TAFI and we've put some modifications on it so

that it works for the ALEC community, but it's the same

system we use for ourself. We've also developed ECTA.

That is the only trouble administration system that's

based on a standard, and that's available out there for

them.

Q   The systems you just mentioned, TAG, EDI, LENS,

and the other interfaces that were designed for the

ALECs, does BellSouth use these interfaces to serve its

own retail customers?

A   No, they have no access to it, nor do they even

1 know much about them. If you were to ask any of those

2 representatives themselves, they would know nothing about

3 them. They're solely developed for the use of the air

4 LECs, now let me clarify that. TAFI, once again, is the

5 same. So they obviously know TAFI. We haven't done

6 anything other than put some -- it's more of a security

7 layer on TAFI for the way an ALEC accesses it, so they

8 only have access to their accounts, as well as we

9 combined TAFI to serve both business and residential

10 customers for ALECs where on the retail side it's

11 separate; but that is the exact same system they're

12 using.

13   Q   Would you please look at your rebuttal

14 testimony at Page 13?

15   A   Okay, I'm there.

16   Q   Earlier you were asked whether BellSouth had

17 defined flow-through differently for ALECs than it

18 defines flow-through for itself. Can you explain whether

19 your testimony on Page 13 reflects that BellSouth

20 considers there to be a different definition for ALECs

21 than there is for BellSouth?

22   A   Let me review the testimony.

23   (WITNESS REVIEWED DOCUMENT)

24   A   The testimony in my rebuttal at Page 13 is

25 dealing with the issue associated with those transactions

1   that manually fall out.

2   Q   Okay.

3   A   And this, once again, as we talk about

4   flow-through is -- and I've illustrated in the exhibit

5   that was with my direct testimony -- it's clear that our

6   definition of flow-through is consistent with the FCC's

7   definition and that the manual fallout associated with

8   that, the FCC has said -- I mean they sent us a letter

9   saying it's okay for you to take that out of the

10   flow-through the way you derive the result, the

11   flow-through definition. That's fine. There's also a

12   letter that I've seen going to U.S. West that, once

13   again, emphasized the definition of flow-through and that

14   those type of transactions it's okay to exclude.

15   So to answer your question, is we are

16   consistent with the definition from the way we do it with

17   our retail units. We have not implied any different

18   definition. It's consistency.

19   Q   Okay. Does BellSouth believe that the

20   definition of flow-through is appropriate to include in

21   the Agreement?

22   A   I'm sorry. I couldn't hear your last.

23   Q   Does BellSouth think it is necessary to include

24   a definition flow-through in the Interconnection

25   Agreement?

1   A   Definitely not. It serves really no purpose.

2 The FCC is defining flow-through, and we have the service

3 quality measures and specific results to this to show the

4 result of flow-through, so it's clear what we're talking

5 about when we use the term "flow-through," so we don't

6 think it's necessary to include that in any

7 interconnection agreement.

8   Q   You were also asked some questions about

9 itemization on bills, and if DeltaCom wanted detailed

10 itemization over and above what BST provides itself,

11 wouldn't it be appropriate for them to submit a new

12 business request?

13   MR. ADELMAN: Objection, leading.

14 BY MR. GOGGIN (Continuing):

15   Q   How can DeltaCom get additional detail on bills

16 over and above what BST provides itself?

17   A   Well, it's not just the bills, but anything

18 that they want over and above what we provide to ourself.

19 There's the new business request process, and they

20 submit. Really the EICCP is a component of that as well,

21 but we will entertain anything they wish to submit. They

22 have to describe, obviously, what it is, and then we'll

23 meet with them to better understand. That has to be

24 priced out, and since it's something that's provided

25 above and beyond what we provide for ourself, there will

1   be a cost associated with it, so -- But if they want

2   those type of things, it can be developed.

3   Q   Has DeltaCom submitted a new business request

4   that relates to additional itemization on the bills it

5   receives?

6   A   Not to my knowledge.

7   MR. GOGGIN: I have no further questions.

8   COMMISSIONER CLARK: Exhibits.

9   MR. GOGGIN: At this time I would like to move

10   the admission of the exhibits Mr. Pate attached to

11   his direct testimony.

12   COMMISSIONER CLARK: It's Exhibit 27. Any

13   objection?

14   MR. ADELMAN: No objection.

15   COMMISSIONER CLARK: Okay. Thank you,

16   Mr. Pate.

17   We will take a break until 10 after 11, and I

18   presume we have one witness left. I hope we get

19   done with him in short order. Thanks.

20   (BRIEF RECESS)

21   (Whereupon, the transcript continues in

22   sequence in Volume 9.

23

24

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