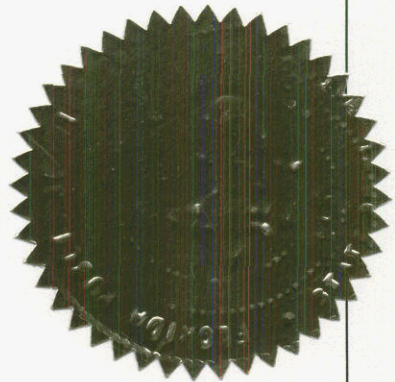


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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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.)

DOCUMENT NUMBER-DATE
14078 NOV 16 99
FPSC-RECORDS/REPORTING

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I N D E X

WITNESSES

NAME	PAGE NO.
RONALD M. PATE	
Direct Examination by Mr. Goggin . . .	1068
Prefiled Direct Testimony Inserted . . .	1072
Prefiled Rebuttal Testimony Inserted. . .	1100
Cross Examination by Mr. Adelman . . .	1131
Cross Examination by Ms. Caldwell . . .	1147
Redirect Examination by Mr. Goggin . . .	1192

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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 BELL SOUTH 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 BELL SOUTH
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 ADDRESSING?

25

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^DELTA COM'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^DELTA COM 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^DELTA COM 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

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^DELTA COM 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^DELTA COM 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.

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Q. WHAT IS THE RSAG?

A. RSAG is a database containing information that can be used to perform address validations. BellSouth provides to ALECs, including ITC^DeltaCom, access to the RSAG database on a real time basis through the LENS and the TAG pre-ordering interfaces. Since the RSAG database is updated nightly, this means ALECs do have real-time access via these interfaces to an up-to-date database.

Q. HOW DOES BELLSOUTH PERFORM ADDRESS VALIDATION FOR ITS RETAIL CUSTOMERS?

A. For residence customers, BellSouth validates addresses using the Regional Negotiation System ("RNS"). For business customers, BellSouth uses the address validation screens in the ^{Direct Order} ~~Service Order~~ Entry (DOE) System ~~Negotiation System ("SONGS")~~. The BellSouth service representative sends an inquiry to and receives a response from the RSAG via RNS and ~~SONGS~~ (DOE)

Q. HOW DO ALECS PERFORM ADDRESS VALIDATION?

A. ALECs can and do perform the address validation function by using LENS or TAG. Using either of these interfaces, the ALEC 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^DELTA COM'S
14 DESIRE TO HAVE BELL SOUTH 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

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,

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

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.

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BellSouth also does not agree with the rest of Paragraph 4.7.2, which states that : "Capability shall be provided to process large orders, UNE orders, and complex orders in a manner at parity to that afforded by BellSouth to itself, its Affiliates, or any other Telecommunications Carrier." First, as described by Mr. Al Varner in his testimony about Issue 2, BellSouth does not use UNEs for itself. Second, large orders and orders for complex services are handled manually for ALECs in substantially the same time and manner as they are handled manually for BellSouth customers.

Q. PLEASE DESCRIBE HOW BELLSOUTH SERVICE REQUESTS ARE MANUALLY HANDLED FOR BELLSOUTH AND ALECS.

A. Before engaging in comparisons, it is important to note that non-discriminatory access does not require that all information and functions for ALECs must be electronic and involve no manual handling. Many services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. Thus, non-discriminatory access to certain functions for ALECs also legitimately may involve manual processes for these same functions.

The manual processes that BellSouth uses for complex resold services offered to the ALECs are accomplished in substantially the same time and manner as the processes used for BellSouth's complex retail

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.

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

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.

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?

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 agree 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

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

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 BELL SOUTH'S EXISTING OPERATIONAL SUPPORT
6 SYSTEMS. BELL SOUTH 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

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~~
5 RSAG ^{Has} ~~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 ("CSRs");~~ (2) ELECTRONICALLY
20 RECEIVE DOWNLOADS OF THE REGIONAL STREET ADDRESS
21 GUIDE ("RSAG")". DOES BELL SOUTH 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 at no
4 charge . . . ". 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 GSR,~~ ITC^DELTA COM CAN
10 BUILD ~~GSR~~ 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 ~~GSR 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^DELTA COM, ON PAGE 17 OF HIS~~
20 ~~TESTIMONY, CLAIMS THAT THE LOCAL CARRIER SERVICE~~
21 ~~CENTER ("LCSC") IS OPEN 8:00 A.M. TO 5:00 P.M. IS THIS~~
22 ~~CORRECT?~~

23

24 A. No.

25

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 ABILITY 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

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

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 BELL SOUTH 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:

	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

1 A. 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^DELTA.COM 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~~ *services on HDSL and ADSL compatible loops* in accordance with the terms of the tariff (ADSL
8 services) *10K* 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

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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 outover 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 outover date?~~**

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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. Alphonse 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 BELL SOUTH'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 BELL SOUTH'S POSITION ON THIS ISSUE?

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With regard to sub-part (c), BellSouth's understanding is that what ITC^DeltaCom apparently wants is for a BellSouth technician to verify ITC^DeltaCom's facilities between BellSouth's central office and ITC^DeltaCom's central office are in working order. Further, ITC^DeltaCom wants BellSouth to use the ANAC functionality to verify that ITC^DeltaCom's order is correct and that the assigned ITC^DeltaCom switch port has dialed.

While BellSouth understands the basis for ITC^DeltaCom's request, these are extra measures that in many cases do no more than perform certain testing "up front" in order to allow ITC^DeltaCom to correct its own mistakes. BellSouth is working with ITC^DeltaCom to arrive at a workable solution to ITC^DeltaCom's request.

Issue 21: [ITC^DeltaCom No. 2(f)] Should BellSouth be required to establish Local Number Portability (LNP) cutover procedures under which BellSouth must confirm with ITC^DeltaCom that every port subject to a disconnect order is worked at one time?

Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

A. ITC^DeltaCom has included new timeframes in the proposed interconnection agreement language that Bellsouth must still review before it can fully respond. BellSouth, however, does agree that coordination between itself and ITC^DeltaCom is extremely important

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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 BELL SOUTH'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

1 Interconnection Agreement. BellSouth stands ready to
2 meet with ITC^DeltaCom to continue these negotiations if
3 ITC^DeltaCom is still interested in pursuing its request.

4 Issue 34 concerns the type of repair
5 information BellSouth should be required to provide, such
6 that ITC^DeltaCom can keep their end-user customers
7 informed.

8 With respect to repair and maintenance of OSS,
9 ITC^DeltaCom and other ALECs have nondiscriminatory
10 access via the Trouble Analysis and Facilitation
11 Interface, TAFI, and the industry standard base
12 Electronic Communication Trouble Administration, ECTA,
13 gateway. Among other things, these interfaces allow
14 ITC^DeltaCom to enter customer trouble tickets into the
15 BellSouth system, retrieve and track current status on
16 trouble tickets, and receive an estimated time to
17 repair.

18 TAFI is the interface of choice for
19 ITC^DeltaCom. TAFI, simply stated, is a user-friendly
20 repair and maintenance interface that often enables
21 trouble reports to be cleared by the repair attendant
22 handling the initial customer contact, frequently with
23 the customer still on the line. But the main point I'd
24 like to clarify is that TAFI is the same repair and
25 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

1 that from our ALEC community. So this is one of those
2 double wins for everybody. It's a win-win situation.
3 It's going to be of significant value to ITC^DeltaCom
4 because a very large percentage of their orders that fall
5 out as a result of that hunting feature. They use that
6 for their customers, which is a common feature that
7 business customers want.

8 Q All right. Thank you.

9 Do you recall testifying in your deposition
10 that substantially the same time and manner describes a
11 process that defines how you order and provision
12 services, for example, would be similar for the retail
13 unit as it would be for the ALEC community, and from a
14 time standpoint, you're talking about the actual time to
15 provision that service would be about the same
16 approximate time as well?

17 A Yes, I recall that discussion.

18 Q In that, are you talking of resale services or
19 unbundled elements?

20 A Well, resale service is the primary thing, but
21 there is a component applicable to unbundled elements;
22 but you've got to recognize, once again, we don't order
23 unbundled network elements for ourselves, so there's a
24 different standard, a standard that the FCC has applied,
25 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.

1 Q Okay. All right.

2 COMMISSIONER JACOBS: Are you familiar with the
3 example that was listed in Mr. Hyde's testimony
4 where the one field was changed from having -- from
5 allowing one, I think it was not allowed, or NA, to
6 none?

7 WITNESS PATE: I think that was the LPIC
8 example that he --

9 COMMISSIONER JACOBS: Okay. Which of those
10 categories you just described would that kind of a
11 notice fall into?

12 WITNESS PATE: That one would have been more
13 detailed information, and that's a good one to
14 discuss. That whole situation was driven by a
15 regulatory, really; and as a result of that, the
16 notice associated with being able to give it was not
17 what we'd like to do, but it wasn't really within
18 our control. We knew it was coming, but we didn't
19 have the order to do it. It had been discussed.
20 Carriers knew about it. I mean this was dealing
21 with the one plus interLATA subscription. It didn't
22 apply here in Florida, but it did in some of the
23 other states, Louisiana, Tennessee and some others;
24 but that's a regulatory driven. Those type of
25 situations we can't always give the notice. And I

1 think you'll find -- even ITC^DeltaCom has said
2 they understand that. I mean that's reasonable.
3 However, sometime, like in that one, we had no
4 notice that we could give, and it resulted even in
5 BellSouth's retail units being disrupted.

6 COMMISSIONER JACOBS: Once a decision is made
7 that you're going to change the processing rules in
8 response to, let's say, an incident like that, the
9 notice that you send out, is it going to specify
10 that as of this date forward the new processing
11 rules will be this, and your orders will be kicked
12 out as a result of failing to adhere to that? Is
13 that the kind of notice that will go out?

14 WITNESS PATE: The notice itself would state
15 what the rules are, and the people that work with
16 this, they know the implication of that is, if you
17 don't change that on your side of the interface, the
18 order is going to be rejected. It will either come
19 back as an auto clarification. It may fall out in
20 that category of errors, or it may be -- usually
21 it's not, but it could just be rejected right up
22 front; but they understand that. I mean that's part
23 of programming systems, so they know if they don't
24 change their side of the interface, that mapping as
25 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

1 material charge from -- or to generate an itemized time
2 and material charge from the BOCRIS system for a specific
3 ALEC?

4 A Yeah. It probably is technically feasible.
5 It's just a programming issue. Let me say that it's not
6 the way we do it for ourself. Right now, what is driven
7 in BOCRIS for any time and material charge that is
8 incurred, is the exact same thing that's driven, exactly,
9 to a BellSouth's end-user customer. It gives you a
10 line-item description and the total dollar amount in the
11 exact same words as we have for our own retail units and
12 used it for years.

13 Q All right. Now when you produce this for
14 yourself, is it for the end customer, like the end user
15 that's just the residential customer that comes out?

16 A Yeah, exactly. Let me take you one step
17 further to understand this. The BellSouth technician
18 fills out a form. It's called an RF-141 or RF-1356. This
19 form is completed describing what they did. Really they
20 don't do much description. There are codes on the form,
21 and they just essentially click off that code, a check
22 mark by that code, and then they enter the dollar
23 amount. Now the dollar amount they enter, those are
24 dollar amounts that are in the tariff. So this is
25 nothing that's driven just at the discretion of

1 BellSouth. These are tariffed dollar amounts, and the
2 ALECs have access to this tariff.

3 So based on then -- the BOCRIS entry, all the
4 representative does that's entering that into BOCRIS is
5 they take that code that's on that form and enter that
6 code, and they enter that dollar amount. And that
7 drives -- you don't see the code on the bill; you see the
8 actual, a description of that dollar amount.

9 So with a little bit of understanding of the
10 various things that they could do -- There's not that
11 many. Work could easily be developed where anyone with
12 ease could interpret that bill. You're looking at less
13 probably -- I'm guessing here a little bit, but I have
14 some data to formulate this guess, less than 3%, if not
15 2%, of all the transactions for repair and maintenance
16 that result in any type of a charge like this.

17 Q So now my next -- when you provide ITC with
18 this, is it broken down by customer as far as the amounts
19 being charged to that customer, or do you just give a
20 lump sum to ITC for the itemized materials and labor
21 charges?

22 A No, it's broken down by customer. When they
23 enter into BOCRIS, they have to enter the phone
24 number --

25 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,

1 which I think is what you're referring to, and they
2 fall out.

3 COMMISSIONER JACOBS: Right.

4 WITNESS PATE: And then there are those that
5 you cannot submit electronically. You have to do it
6 manually.

7 COMMISSIONER JACOBS: Right.

8 WITNESS PATE: If you submit it electronically,
9 the rate that's charged to you is that electronic
10 rate, three and a half dollars or whatever it is,
11 and that's part of her study that she would have to
12 speak as to how that's derived.

13 COMMISSIONER JACOBS: So it doesn't -- if then
14 it gets into the process and you have to enter it
15 manually into the DOE --

16 WITNESS PATE: That's correct. That's correct.

17 COMMISSIONER JACOBS: -- it stays as an
18 electronic LSR?

19 WITNESS PATE: For the way -- from that charge
20 for the transaction, yes, we treat it as electronic.
21 And, you know, over time as the standards evolve --
22 I mean our goal, of course, is to reduce that number
23 considerably over time as the functionality is
24 programmed as a result of evolving standards from
25 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

1 report. This was an excerpt. You can see, just for
2 clarity purposes, the name, and then it has numbers.
3 These are individual CLECs, and obviously, the
4 information is proprietary to them. So the way we
5 post this is by putting a code, and we scramble them
6 each time so they're never in the same order.

7 COMMISSIONER JACOBS: I see.

8 WITNESS PATE: So if you can see, I go 1
9 through 10 and then there's huge break from 124 to
10 133. All I was trying to do was capture the
11 beginning and the end. So all of the numbers that
12 you have on Page 2 are driven from those bottom-line
13 totals down at the bottom of that report --

14 COMMISSIONER JACOBS: Okay. I see.

15 WITNESS PATE: -- to illustrate how this works
16 and really to provide a mathematical illustration of
17 the derivation of the flow-through result.

18 COMMISSIONER JACOBS: Now so is this -- so on
19 this particular report, the total of rejects is 43
20 for LENS?

21 WITNESS PATE: Let me pull out this page so I
22 can have them side by side. If I heard you
23 correctly, you were focused in the second block of
24 the LEO and you were interested in the fatal
25 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

1 platform. So what we've tried to do through the TAG
2 is develop a system to where, since there's not a
3 preordering interface in EDI, is develop a system
4 that you can use that preordering component to do
5 what we just said, take that preordering
6 information. Use, for example, the RSAG. I mean
7 RSAG, the whole issue here from my understanding,
8 the reason they want a download of RSAG is so they
9 can do address validation on their side of the
10 interface because they are experiencing some errors
11 there. It's a common experience. It's nothing
12 unique to them because you've got to have that
13 address exactly like it is in RSAG. And for me I
14 live on 50 -- 51 Galatree Lane. I assure you,
15 that's not the way it appears in RSAG because that's
16 driven to how the facilities go there. And I've
17 looked at it before, but I've forgotten, but it has
18 some characters that no one would have dreamed
19 that's in there. So they need to have that exact,
20 or otherwise the order gets rejected.

21 COMMISSIONER JACOBS: I understand.

22 WITNESS PATE: So we're saying, okay, well, TAG
23 will let you do that. TAG will let you go, the
24 preordering functionality, get that information, and
25 even if you still want to use EDI, put it in that

1 EDI order. Now they would have to make a decision
2 whether to totally via TAG and using the ordering
3 functionality, but that's a decision they're going
4 to have to make as they do their evaluation. But we
5 provided them the system that they can continue to
6 use the expertise that they have developed, the
7 knowledge they have developed around EDI, at the
8 same time, they're going to have to develop some
9 knowledge and expertise using the CORBA standard
10 with the TAG API.

11 COMMISSIONER JACOBS: And so that I'm clear,
12 the CORBA standard will allow the TAG preordering to
13 flow into the EDI provisioning?

14 WITNESS PATE: Yeah. The CORBA standard is
15 nothing more than the way the information is
16 transported, and then the TAG API itself deals with
17 the functionality of taking that information and
18 putting it -- it tells it how to get it and pull it
19 to them. The combination of those two will allow
20 you to drive that information then over to that EDI
21 order. There is already another company --
22 obviously for proprietary reasons I can't say who it
23 is -- they use EDI. They've made the investment,
24 but they are using TAG for some preordering.

25 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 receipt -- 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

1 very professional organization, and they have a
2 sophisticated IT approach based on everything I've seen.
3 So it just make sound business logic and understanding
4 that they are developing a system that's unique to them
5 to serve them. That's their internal OSS.

6 Q Has BellSouth developed OSS interfaces designed
7 for use by ALECs to access BellSouth's OSS?

8 A Yes. Those were the interfaces that we've
9 discussed here, specifically for ordering and
10 provisioning, you know, the LENS, EDI and TAG; and it's
11 also then the necessary systems that it has to go through
12 for that conversion of that LSR format to the sales
13 service order format. Those specifically are LEO and
14 LESOG. And then, of course, we have developed TAFI. We
15 have taken TAFI and we've put some modifications on it so
16 that it works for the ALEC community, but it's the same
17 system we use for ourself. We've also developed ECTA.
18 That is the only trouble administration system that's
19 based on a standard, and that's available out there for
20 them.

21 Q The systems you just mentioned, TAG, EDI, LENS,
22 and the other interfaces that were designed for the
23 ALECs, does BellSouth use these interfaces to serve its
24 own retail customers?

25 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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