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ORLANDO TELEPHONE COMPANY, INC.
REBUTTAL TESTIMONY OF DON LEE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 990884-TP
November 30, 1999

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION FOR THE RECORD.

A. My name is Donald (Don) Lee. I am employed by Martin and Associates, Inc., located at 1515 North Sanborn Boulevard, Mitchell, South Dakota, 57301-1021. I am the director of the LEC Settlements Division which provides management consulting and financial analysis dealing with nearly all phases of telecommunications management such as network, tariffs, contract development and feasibility studies. While employed at Martin and Associates, my consulting services have been utilized on numerous network and billing projects. My background covers over thirty-five years in the telecommunications industry, including nineteen years as manager of the Mid Iowa Telephone Cooperative in Gilman, Iowa. For the last 15 years I have been a telecommunications consultant for Martin and Associates, Inc.

Q. HAVE YOU EVER TESTIFIED BEFORE ANY PUBLIC SERVICE COMMISSION AS AN EXPERT WITNESS REGARDING TELECOMMUNICATIONS?

1 A. Yes. I have testified before the Iowa Utility Board and recently before the South
2 Dakota Public Utility Commission.

3

4 **Q. WHAT IS THE BUSINESS OF MARTIN & ASSOCIATES?**

5

6 A. Martin and Associates, Inc. is a consulting engineering and software development
7 firm. Our firm works almost exclusively for the communications industry. A
8 copy of their brochure is attached as Exhibit DL-1.

9

10 **Q. IN THE COURSE OF PERFORMING SERVICES FOR MARTIN &
11 ASSOCIATES' CLIENTS, ARE YOU AWARE OF ANY BILLING
12 PROBLEMS THAT WERE ASSOCIATED WITH THE PORTING OF
13 NUMBERS BEFORE A PERMANENT NUMBER PORTABILITY
14 SOLUTION WAS DEVELOPED?**

15

16 A. Yes, I am and have been aware for some time that Interim Number Portability did
17 raise some issues regarding access billing, and for the most part those issues
18 disappear with full Local Number Portability.

19

20 **Q. WERE YOU AND YOUR COMPANY ABLE TO ADDRESS AND SOLVE
21 ANY INTERIM NUMBER PORTABILITY PROBLEMS FOR ANY OF
22 YOUR CLIENTS, AND, IF SO, HOW DID YOU DO THIS?**

23

24 A. During the interconnection agreement negotiations on behalf of several of our
25 competitive local exchange carrier clients this issue came up, and was

1 successfully negotiated utilizing at least two different methods. These methods
2 are summarized as (1) revenue sharing and (2) furnishing access data. This access
3 data would be furnished in an industry standard EMI format.

4

5 **Q. IS ORLANDO TELEPHONE COMPANY (OTC) YOUR CLIENT?**

6

7 A. Yes.

8

9 **Q. ARE YOU AWARE THAT OTC HAD A PROBLEM BILLING IXC'S**
10 **TERMINATING ACCESS IN THE INTERIM NUMBER PORTABILITY**
11 **ENVIRONMENT?**

12

13 A. Yes, but we only became aware of that recently. We were never involved in the
14 issue until November 22, 1999.

15

16 **Q. IF YOU HAD BEEN REQUESTED TO DO SO, DO YOU BELIEVE THAT**
17 **MARTIN & ASSOCIATES COULD HAVE SOLVED THE PROBLEM**
18 **OTC HAD WITH SPRINT?**

19

20 A. I am not sure that we could have solved the problem between OTC and Sprint.
21 However, I do know that we have developed the software to allow the furnishing
22 of access data on behalf of others of our clients.

23

24 **Q. DO YOU BELIEVE SPRINT COULD HAVE SOLVED OTC'S BILLING**
25 **PROBLEM SO THAT OTC COULD HAVE RECOVERED AMOUNTS**

1 **DUE FROM IXCS FOR TERMINATING ACCESS IN THE INTERIM**
2 **NUMBER PORTABILITY ENVIRONMENT?**

3

4 A. In my opinion there were at least three options available, and the problem could
5 have been solved. Those options are: 1) Revenue sharing; 2) Data sharing; 3)
6 Meet point billing utilizing the single bill multiple tariff concept.

7

8 **Q. IN YOUR OPINION DID SPRINT HAVE AVAILABLE CALL DATA**
9 **THAT COULD HAVE BEEN PROVIDED TO OTC OR OTC'S AGENT**
10 **TO PERMIT OTC TO BILL IXCS FOR TERMINATING ACCESS IN**
11 **THE INTERIM NUMBER PORTABILITY ENVIRONMENT THAT**
12 **EXISTED IN 1998 IN FLORIDA?**

13

14 A. I am not aware that Interim Number Portability was any different in Florida than
15 anywhere else in the nation, and if it were the same, I believe the data would have
16 been available. The issue becomes one of "what form is the data in." My
17 presumption is that Sprint would have billed their appropriate charges for the
18 access services they provided. Thus the data was available; the question is in the
19 ability to provide it to OTC.

20

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

22

23 A. Yes.

Specialization and diversification are two words that seem to be mutually exclusive. Martin and Associates, Inc. has combined these two into an organization providing sophisticated engineering and consulting expertise in several fields. Primary among these are telecommunications, cost separations, computer services, accounting, electrical engineering, and cable television. This broad background in the needs of operating utilities provides a natural base for a tour de force in planning and design.

Martin and Associates, Inc. staff has provided consulting and engineering services to clientele since 1966, and computer service since 1977. Professional engineers, computer specialists, technicians, accounting specialists and CAD personnel are representative of our staff. Key people represent an average of over twenty years experience in their fields. We have Registered Professional Engineers in 16 states.

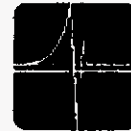
Client references are readily available upon request.



Thank You!

The selection of our firm to serve your professional needs has given us the opportunity to realize the confidence you have in us. We will make every effort to extend to you the professional service your confidence deserves. We will do our utmost because we want you to feel comfortable recommending our firm to your associates.

Welcome to...



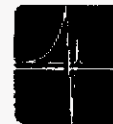
Martin and Associates, Inc.

CONSULTANTS • PROFESSIONAL ENGINEERS • COMPUTER SPECIALISTS

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Established 1971



Martin and Associates, Inc.

CONSULTANTS • PROFESSIONAL ENGINEERS • COMPUTER SPECIALISTS

DON LEE

Director

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—CONSULTANTS—
—PROFESSIONAL ENGINEERS—
—COMPUTER SPECIALISTS—

EXHIBIT DL-1

NOV-24-99 09:30AM FROM-MARTIN AND ASSOCIATES

605-995-2577

T-820 P.02/10 F-822

Services...

Accomplishments...

■ CONSULTING

- Operational and Management Assistance
- Rate and Tariff Development and Assistance
- Settlement Review and Assistance
- Acquisitions, Consolidations, Mergers & Divestitures
- Division of Revenue Studies
- Cost Separations Studies
- Cost Accounting
- Feasibility Studies
- Network Planning
- System Planning
- Business Plans
- Equal Access Conversions
- Depreciation Studies
- Access Charge Development
- Marketing Assistance & Development
- Human Resource and Organizational Assistance

■ PROFESSIONAL ENGINEERING

- Telecommunications
- Digital Switches
- Fiber Optic Transmission
- Microwave Radio
- Electric Power Distribution
- Commercial Electrical Design
- Standby Power Systems
- Satellite TVRO Systems
- CATV and MMDS
- Educational Interactive Video
- Fiber in the Loop

■ COMPUTER SERVICES

- Software Design and Development
- Hardware Provisioning (In-House)
- Timesharing and In-House System Support
- Integrated Software Packages Developed Include:
 - Local, Toll, CATV and Wireless Billing
 - Service Order and Directory
 - Online Inquiry and Reporting
 - Accounting and Accounts Payable
 - Payroll and Distribution
 - Plant Records and CADS Database
 - User Defined Report Writer
 - Dial-In Computer Voice Inquiry
 - Materials Inventory and CPRs
 - CABS, Including FGA and FGB
 - Toll Rating
 - Traffic and Toll Polling
 - Mapping Editor (CAD)
 - Trouble Reporting

■ MARTIN AND ASSOCIATES, INC. HAS BEEN INSTRUMENTAL IN:

- Provisioning of Digital Switches
- Long Local Loop Application of Carrier
- Conversion to the Use of Filled Buried Cable
- Independent Network Development
- Centralized Equal Access Networks
- Fiber in the Local Loop

■ DESIGN, FEASIBILITY AND ENGINEERING PROJECTS COMPLETED ON OVER:

- \$720,000,000 of Projects
- 40,000 Miles of Outside Plant
- 550 Digital Central Offices
- 8,000 Miles of Fiber Optics
- 350 Division of Revenue Studies
- 3,200 Central Office Traffic Studies
- 1,000 Miles of Digital Microwave
- 130 Cable Television Systems
- 250 Standby Power Plants
- 170 Environmental Reports

■ SOFTWARE AND DATA PROCESSING

- Integrated Software Packages
- Complete In-House Solution
- Flexibility:
 - Combined Bills for Telephone, CATV, Internet
 - Clients in ~~32~~ States

37

■ OVER 250 UTILITY COMPANY CLIENTS

■ STAFF OFFERS OVER 900 YEARS EXPERIENCE

■ KEY PEOPLE AVERAGE OVER 20 YEARS EXPERIENCE

■ LICENSED PROFESSIONALS ON STAFF