

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF DAVID P. SCOLLARD  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4 DOCKET NO. 991237-TP

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ORIGINAL

6  
7 Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH  
8 BELL SOUTH TELECOMMUNICATIONS, INC.

9  
10 A. I am David P. Scollard, Room 26D3, 600 N. 19th St., Birmingham, AL 35203.  
11 My current position is Manager, Wholesale Billing at BellSouth Billing, Inc., a  
12 wholly owned subsidiary of BellSouth Telecommunications, Inc. In that role, I  
13 am responsible for overseeing the implementation of various changes to  
14 BellSouth's Customer Records Information System ("CRIS") and Carrier  
15 Access Billing System ("CABS").

16  
17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18  
19 A. I graduated from Auburn University with a Bachelor of Science Degree in  
20 Mathematics in 1983. I began my career at BellSouth as a Systems Analyst  
21 within the Information Technology Department with responsibility for  
22 developing applications supporting the Finance organization. I have served in a  
23 number of billing system design and billing operations roles within the billing  
24 organization. Since I assumed my present responsibilities, I have overseen the  
25 progress of a number of billing system revision projects such as the

1 implementation of the 1997 Federal Communications Commission ("FCC")  
2 access reform provisions, billing of unbundled network elements ("UNEs"), as  
3 well as the development of billing solutions in support of new products offered  
4 to end user customers. I am familiar with the billing services provided by  
5 BellSouth Telecommunications to local competitors, interexchange carriers and  
6 retail end user customers.

7

8 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC  
9 SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE SUBJECT  
10 OF YOUR TESTIMONY.

11

12 A. I have testified before the state Public Service Commissions in Alabama,  
13 Florida, Georgia, Kentucky, Louisiana, Mississippi, South Carolina, the  
14 Tennessee Regulatory Authority, and the Utilities Commission in North  
15 Carolina on issues regarding the capabilities of the systems used by BellSouth  
16 to bill for services provided to retail customers, Interexchange Carriers (IXCs)  
17 as well as Alternative Local Exchange Carriers (ALECs).

18

19 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS  
20 PROCEEDING?

21

22 The purpose of my rebuttal testimony is to address comments made by AT&T  
23 witness Langin-Hooper on the billing of Carrier Common Line (CCL) Charges  
24 for access calls originated to or terminated by an IXC.

25

1 Q. HOW DOES BELLSOUTH BILL COMMON CARRIER LINE CHARGES  
2 TO AN IXC?

3  
4 A. BellSouth uses a system called the Carrier Access Billing System (CABS) to  
5 accumulate, rate and bill all usage charges for access calls inbound from or  
6 outbound to an interexchange carrier. One such usage charge is CCL. Several  
7 times each day usage records for call events that have occurred in the BellSouth  
8 network are transmitted to the BellSouth data centers for processing. Records  
9 for calls to be billed to BellSouth's retail customers are sent to the retail billing  
10 systems while records for access calls are sent to CABS. Once in CABS, these  
11 records are edited to insure that the data is valid and updated to a data base to  
12 await the close of the bill cycle for the IXC being billed. At the end of the bill  
13 cycle, the minutes of use for each type of call being billed are rated and the  
14 resultant charges are formatted into the appropriate invoice records (or printed)  
15 and sent to the customer. Separate rates are applied for each rate element, such  
16 as CCL, being billed.

17  
18 Q. IN HIS TESTIMONY, AT&T WITNESS LANGIN-HOOPER STATES  
19 THAT CCL SHOULD NOT BE CHARGED FOR ACCESS CALLS THAT  
20 INTERACT WITH VARIOUS RETAIL SWITCH FEATURES SUCH AS  
21 CALL FORWARDING OR THREE-WAY CALLING. IS IT POSSIBLE TO  
22 MAKE SUCH EXCLUSIONS IN CABS TODAY?

23  
24 A. No. As I stated above, the only data that is available to the billing system to  
25 know that a call event has occurred are the recordings that are made at the

1 switches at the time the calls are routed through the network. For most of the  
2 calls described by Mr. Langin-Hooper, the switches do not indicate on the  
3 records when the switch feature such as call forwarding or three-way calling  
4 was invoked. Therefore, today the billing system has no way to identify the  
5 times when CCL would need to be excluded according to Mr. Langin-Hooper's  
6 plan.

7  
8 Q. WHAT CHANGES WOULD BE NEEDED TO BE MADE TO CABS TO  
9 ACCOMPLISH THE TASK OF EXCLUDING CCL FROM ACCESS CALLS  
10 WHICH INTERACT WITH THESE SWITCH FEATURES?

11  
12 A. CABS would have to be changed to accomplish what is termed "record  
13 correlation." What this means is that because the switch recording produced as  
14 part of the access call does not have all of the information to exclude CCL (i.e.,  
15 information stating that a switch feature has been involved in another call  
16 event), the billing system would have to search through all of the other call  
17 records to find the missing data. For example, if an IXC customer in Miami  
18 places a toll call to Tallahassee, and at the Tallahassee terminating point the end  
19 user has activated call forwarding and that call is routed to another number in  
20 Tallahassee, the call will have generated two usage records. First, there will  
21 have been a terminating access recording made at either the BellSouth tandem  
22 office or at the end office depending on the routing of the call. As mentioned  
23 above, this record will find its way to CABS to be billed. A second record is  
24 made reflecting the local call that has occurred when the call was forwarded. As  
25 mentioned above this call record will find its way to the retail billing system. It

1 is important to note that the first record (for the terminating access call) has  
2 nothing recorded on it that gives any hint to the fact that the second record  
3 exists. The switch software calls for these two records to be produced as  
4 reflecting independent call events. Record correlation, then, could be described  
5 as the first record's hunt for any possible second records that may exist.

6

7 Q. WHAT WOULD BE INVOLVED IN PROVIDING FOR RECORD  
8 CORRELATION IN THE BILLING SYSTEMS USED BY BELL SOUTH?

9

10 A. In Florida, BellSouth processes about 2.5 billion call records each month. These  
11 consist of approximately one third access records and two thirds retail records.  
12 Generally, once records for a given bill period have been billed they are either  
13 stored temporarily as billed usage records for study purposes or discarded  
14 altogether. In order for record correlation to be performed, CABS would have  
15 to access and sift through at least a couple of months of this billing usage from  
16 both the access side and the retail side of the process each time an access call is  
17 being billed. In addition, since the records are processed independently, each  
18 time an edit has uncovered a problem with one of these records and it is  
19 repaired or fixed, another search back through the data would be needed to  
20 ensure that the fix that has occurred did not either uncover a new match or  
21 break a match already made. Once these matches are made an analysis would  
22 need to take place to determine how much CCL would apply to the calls. In  
23 some instances CCL would be applied. In other cases CCL would not apply. In  
24 the case of access calls interacting with Call Waiting, only part of the CCL  
25 would be charged. In each of these scenarios, additional work would be

1 required to provide information on the access bills to allow the IXC to validate  
2 them. Therefore, the resultant billing records would be far more complex than  
3 they are currently to account for all of the possible traffic type and retail feature  
4 interaction possibilities.

5

6 Q. WHAT RISKS ARE INHERENT IN ANY PLAN TO PERFORM RECORD  
7 CORRELATION IN THE BILLING SYSTEMS?

8

9 A. Clearly with the enormous amounts of new processing that would be required in  
10 both the retail and access systems to match one record with another the risk is  
11 that the billing systems could not complete a bill cycle for any customer in the  
12 timeframes required. In addition, the costs of adding the processing capacity to  
13 perform the sifting function would be enormous.

14

15 Q. IS THIS ISSUE UNIQUE TO BELLSOUTH OR WOULD IT AFFECT ALL  
16 LOCAL CARRIERS WHICH PROVIDE SERVICES TO IXCS?

17

18 A. While I cannot speak for all carriers, I know of no other service or product  
19 generally provided to an IXC which would have required a local carrier to build  
20 a record correlation capability described in my testimony. Therefore, I am  
21 confident that no local carrier has the ability to assess CCL in the manner  
22 proposed by AT&T. Certainly, no carrier has ever brought an issue to the  
23 Ordering and Billing Forum (OBF) for the industry to begin to consider what  
24 would need to occur to reflect this new treatment of CCL on the access bills  
25 being produced. Thus, a decision in favor of AT&T in this case would

1           necessitate wide-spread changes to the billing systems of all local carriers. As  
2           referenced in the rebuttal testimony of Jerry Hendrix, changes of this magnitude  
3           should come about as a result of a rulemaking proceeding, not as part of a  
4           complaint proceeding.

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

7

8   A.    **Yes.**

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