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RECORDS AND
REPORTING

November 1, 2000

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000828-TP (Sprint Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Daonne Caldwell, David Coon, W. Keith Milner and John Ruscilli, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

APP _____
CAF _____
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COM Spang
CTR _____
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LEG 2
OPC _____
PAI _____
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SEC _____
SER _____
OTH _____

Sincerely,

E. Earl Edenfield Jr.
E. Earl Edenfield Jr. (EW)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

Caldwell
DOCUMENT NUMBER - DATE
14174 NOV-18
FPSC-RECORDS/REPORTING

Coon
DOCUMENT NUMBER - DATE
14175 NOV-18
FPSC-RECORDS/REPORTING

Milner
DOCUMENT NUMBER - DATE
14176 NOV-18
FPSC-RECORDS/REPORTING

Ruscilli
DOCUMENT NUMBER - DATE
14177 NOV-18
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CERTIFICATE OF SERVICE
Docket No. 000828-TP



I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 1st day of November, 2000 to the following:

Timothy Vaccaro
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E. Earl Edenfield Jr.
E. Earl Edenfield Jr. 

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF DAVID A. COON
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 000828-TP
5 NOVEMBER 1, 2000
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH
8 TELECOMMUNICATIONS, INC. ("BELL SOUTH") AND YOUR
9 BUSINESS ADDRESS.

10

11 A. My name is David A. Coon. I am employed by BellSouth as Director –
12 Interconnection Services for the nine-state BellSouth region. My
13 business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

14

15 Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL
16 BACKGROUND?

17

18 A. My career at BellSouth spans over 20 years and includes positions in
19 Network, Regulatory, Finance, Corporate Planning, Small Business Services and
20 Interconnection Operations. Prior to my BellSouth employment, I performed a
21 variety of functions in the Network, Regulatory and Marketing Support
22 organizations of C&P Telephone Company-Washington. I have extensive
23 experience in the development and use of quantitative measurements and results
24 including the establishment, analysis and monitoring of BellSouth process
25 measures. I received a Bachelors Degree in Civil Engineering from Ohio

1 University and a Masters Degree in Engineering Administration from George
2 Washington University. I received the Certified Management Accountant
3 (CMA) designation in 1996 from the Institute of Management Accountants.

4

5 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

6

7 A. I will respond to issues 24 and 25 in the Sprint Petition for Arbitration in
8 Florida. However, these issues are currently being considered in the Florida
9 generic performance metrics docket, Docket No. 000121-TP, and as such,
10 BellSouth believes that these issues should be moved to that docket for
11 resolution since these issues impact the entire ALEC community in Florida and
12 not just Sprint.

13

14 ***Issue 24: What is the appropriate level of geographic disaggregation for***
15 ***performance measurement reporting to Sprint?***

16

17 Q. WHAT IS THE APPROPRIATE LEVEL OF GEOGRAPHIC
18 DISAGGREGATION TO BE USED BY BELL SOUTH IN PRODUCING IT'S
19 SERVICE QUALITY MEASUREMENTS?.

20

21 A. BellSouth believes that in producing service quality measurements in
22 Florida, the appropriate level of disaggregation is at the state level for most
23 measurements. However, disaggregation should be at the regional level for
24 those measurements, e.g. OSS Response Interval/Availability and Billing,

25

1 where measurements are produced from OSSs that are common to the entire
2 BellSouth region and not state specific.

3

4 Q. WHY IS STATE LEVEL REPORTING ADEQUATE ON THOSE
5 MEASUREMENTS THAT ARE NOT REGIONAL IN SCOPE?

6

7 A. In accordance with the provisions of the Telecommunications Act of 1996
8 requiring non-discriminatory treatment of ALECs, BellSouth provides
9 Performance Measurements that permit regulatory bodies to monitor whether
10 BellSouth is providing such non-discriminatory access. The monitoring of non-
11 discriminatory access, however, does not require BellSouth to have
12 measurements for each and every process or sub-process, for each and every
13 product, at the lowest geographic level, each month.

14

15 BellSouth reports on approximately 8,000 performance measurement results
16 each month at the state level. These results would, at a minimum, triple if
17 reporting were done at the MSA level. In considering additional geographic
18 disaggregation below the state level, the Commission must consider if even
19 more results will clarify or further confuse the Commission's ability to detect
20 non-discriminatory access.

21

22 ***Issue 25: What performance measurement audit provision(s) should be included in***
23 ***the Agreement?***

24

25

1 Q. IS BELLSOUTH'S SQM APPENDIX C AUDIT PROPOSAL SUFFICIENT
2 FOR THE FPSC TO CONCLUDE THAT BELLSOUTH MEETS ITS
3 OBLIGATIONS UNDER THE ACT?

4

5 A. Yes. BellSouth's SQM, Appendix C, sets forth BellSouth's position on
6 auditing performance measurements. This position provides the Commission
7 with sufficient auditing capability to conclude that BellSouth is meeting its
8 obligations under the Act.

9

10 Q. HOW DOES BELLSOUTH'S AUDIT POSITION DIFFER FROM SPRINT'S
11 PROPOSAL?

12

13 A. BellSouth's audit proposal, Appendix C of the SQM, states that "if requested by
14 a Public Service Commission or by an ALEC exercising contractual audit rights,
15 BellSouth will agree to undergo a comprehensive audit of the aggregate level
16 reports for both BellSouth and the ALEC(s) for each of the next five (5) years
17 (2000-2005), to be conducted by an independent third party. The results of that
18 audit will be made available to all parties (ALECs) subject to proper safeguards
19 to protect proprietary information. This aggregate level audit includes the
20 following specifications:

- 21 1. The cost shall be borne 50% by BellSouth and 50% by the
22 ALEC or ALECs.
- 23 2. The independent third party auditor shall be selected with input
24 from BellSouth, the PSC, if applicable, and the ALEC(s).

25

1 3. BellSouth, the PSC and the ALEC(s) shall jointly determine the
2 scope of the audit.”

3 As you can see, BellSouth’s audit position focuses on doing a single
4 comprehensive audit per year that addresses the needs of the entire ALEC
5 community in aggregate and the Commission with BellSouth absorbing 50% of
6 the cost. If Sprint’s proposal were adopted, BellSouth could be faced with
7 participating in over 900 audits a year (there are currently 918 ALECs with
8 agreements in BellSouth’s region). Given that there are 341 working days in a
9 year, discounting weekends, that could equate to more than 2.7 audits a day. If
10 Sprint’s auditing proposal was mandated by this Commission solely and
11 exclusively for Sprint, then by definition, Sprint would be receiving
12 discriminatory treatment not available to other ALECs contrary to the
13 requirements of the 1996 Act. Sprint further proposes additional “mini-audits”
14 of individual measurements “limited to no more than three (3) requests in each
15 calendar year”. Using the same rationale described above this could increase
16 the number of audits requiring BellSouth’s participation by an additional 2,754
17 (918 ALECs X 3 mini-audits/year) per year which equates to 8 additional audits
18 per day. Regardless of who pays for these audits, this is totally unreasonable
19 and would dictate a tremendous burden on BellSouth resources.

20

21 Q. ARE THERE ANY ALTERNATIVES TO THE “MINI-AUDITS” PROPOSED
22 BY SPRINT IDENTIFIED ABOVE?

23

24 A. Yes. BellSouth provides the ALECs, including Sprint, with the raw data
25 underlying many of the BellSouth Service Quality Measurements reports as

1 well as a user manual on how to manipulate the data into reports. The ALECs,
2 including Sprint, can use this raw data to validate the results in the BellSouth
3 Service Quality Measurements reports posted every month on the BellSouth
4 web site. In addition, the underlying raw data is in the process of being audited
5 and validated by KPMG in Georgia, and in planned audits in Louisiana and here
6 in Florida

7

8 This data and the user manual allow the ALECs to build customized reports and
9 further disaggregate reports based on individual ALEC needs. I know of no
10 other local exchange company that provides similar tools to the ALEC
11 community.

12

13

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15

16 A. Yes

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18

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