

1 SUPPLEMENTAL TESTIMONY OF
2 WILLIAM J. CARROLL
3 ON BEHALF OF AT&T COMMUNICATIONS
4 OF THE SOUTHERN STATES, INC.
5 BEFORE THE
6 FLORIDA PUBLIC SERVICE COMMISSION

7 Docket No. [REDACTED] P

8 Filed: August 23, 1996
9

10 Q. PLEASE IDENTIFY YOURSELF.

11
12 A. My name is William J. (Jim) Carroll and my business address is 1200 Peachtree
13 Street, Atlanta, Georgia, 30309.
14

15 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THIS COMMISSION?
16

17 A. Yes. I supplied direct testimony to this Commission in this docket. I also provided
18 testimony before this Commission regarding AT&T's petition for arbitration with
19 GTE.
20

21 Q. WHAT IS THE PURPOSE OF THIS TESTIMONY IN THIS
22 PROCEEDING?
23

24 A. The purpose of my supplemental testimony is to summarize AT&T's initial positions
25 regarding the effect on AT&T's requests and BellSouth's responses in negotiations of

DOCUMENT NUMBER-DATE
08999 AUG 23 1996
FPSC-RECORDS/REPORTING

1 the Federal Communications Commission ("FCC") First Report and Order 96-325,
2 filed August 8, 1996 (hereinafter in witness testimony "FCC Order"). The FCC
3 Order will be referred to in the witness testimony by paragraph number. The FCC
4 Order includes the regulations codifying the FCC's interpretation of the Act
5 (hereinafter in witness testimony "FCC regulations" or "47 C.F.R. § ____").
6 Attached to my testimony at Exhibit JCS-1 is a matrix of: the issues relevant to the
7 arbitration petition before the Commission, the witnesses that will address the impact
8 of the FCC Order and FCC regulations on the issues, and, based upon AT&T's initial
9 review of the FCC Order and FCC regulations, a summary of the impact of the FCC
10 Order and FCC regulations on the issues.

11

12 **Q. PLEASE SUMMARIZE YOUR INITIAL OPINION REGARDING THE**
13 **EFFECT OF THE FCC'S AUGUST 8, 1996 ORDER AND REGULATIONS**
14 **ON THE RELEVANT ISSUES.**

15

16 **A.** Based upon AT&T's initial review of the FCC Order and regulations, I believe the
17 FCC Order and regulations expressly support many of the positions that AT&T has
18 maintained during negotiations and states in its petition for arbitration against
19 BellSouth. As to the remainder of the issues, I believe the FCC Order and FCC
20 regulations implicitly, but strongly, support AT&T's position. AT&T will continue
21 to review the FCC Order and regulations and supply the Commission with any
22 additional information relevant to the arbitration.

23

24 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

25

1 A. Yes.

FLORIDA MATRIX SUMMARIZING FCC RULES BY ISSUE

ISSUE	FCC RULES	AT&T WITNESS
1. What services provided by BellSouth, if any, should be excluded from resale?	BellSouth cannot exclude any retail telecommunications service sold to a non-carrier at retail from its wholesale obligations.	Sather
2. What terms and conditions, including use and user restrictions, if any, should be applied to resale of BellSouth services?	Resale restrictions are presumptively unreasonable and prohibited except that specified restrictions related to short-term promotions of 90 days or less, cross-class selling and withdrawn services are presumptively reasonable.	Sather
3.a) When AT&T resells BellSouth's services, is it technically feasible or otherwise appropriate for BellSouth to brand operator services and directory services calls that are initiated from those resold services?	BellSouth must rebrand operator and directory assistance services unless it can prove that it is not technically feasible.	Shurter
3.b) When BellSouth's employees or agents interact with AT&T's customers with respect to a service provided by BellSouth on behalf of AT&T, what type of branding requirements are technically feasible or otherwise appropriate?	FCC principles relating to branding and parity require branding of services and materials.	Shurter
4. When AT&T resells BellSouth's local exchange service or purchases local switching, is it technically feasible or otherwise appropriate to route 0+ and 0- calls to an operator other than BellSouth's, to route 411 and 555-1212 directory assistance calls to an operator other than BellSouth's, or to route 611 repair calls to a repair center other than BellSouth's?	BellSouth must provide customized routing to AT&T service platforms unless it can prove that this is not technically feasible.	Shurter
5. Should BellSouth be required to provide notice to its wholesale customers of changes to BellSouth's services? If so, in what manner and in what time frame?	The FCC did not address this specific issue, but the FCC's concept of parity requires such notice.	Shurter
6. How should BellSouth treat a PIC change request received from an IXC other than AT&T for an AT&T local customer?	The FCC did not address this specific issue, but FCC's concept of parity requires that BellSouth require the IXC to contact AT&T, as	Shurter

ISSUE	FCC RULES	AT&T WITNESS
	the local exchange carrier, to effectuate the PIC change request.	
7. What are the appropriate wholesale rates for BellSouth to charge when AT&T purchases BellSouth's retail services for resale?	Appropriate wholesale rates equal retail rates less reasonably avoidable retail costs.	Lerma
8. What are the appropriate trunking arrangements between AT&T and BellSouth for local interconnection?	When traffic volumes do not justify one-way trunks, BellSouth must provide two-way trunks where technically feasible.	Tamplin
9. What should be the compensation mechanism for the exchange of local traffic between AT&T and BellSouth?	The Commission has three options: (1) symmetrical rates based on forward looking, long run economic cost; (2) FCC proxy prices; or (3) bill and keep.	Ellison Gillan Kaserman
10.a) Are the following items considered to be network elements, capabilities, or functions? If so, is it technically feasible for BellSouth to provide AT&T with these elements? <ul style="list-style-type: none"> Network Interface Device Loop Distribution Loop Concentrator/ Multiplexer Loop Feeder Local Switching Operator Systems Dedicated Transport Common Transport Tandem Switching Signaling Link Transport Signal Transfer Points Service Control Points/ Databases 	BellSouth must provide, at a minimum, unbundled access to seven specified network elements. State Commissions must require further unbundling of network elements unless BellSouth proves that the unbundling is not technically feasible.	Tamplin
10.b) What should be the price of each of the items considered to be network elements, capabilities, or functions?	The price should reflect the long run incremental economic cost of the element, plus a reasonable allocation of joint and common costs.	Kaserman Gillan Ellison
11. Do the provisions of Sections 251 and 252 apply to access to unused transmission media (e.g., dark fiber)? If so, what are the appropriate rates, terms, and conditions?	The FCC rules declined to address unused transmission media because the record was insufficient to determine if unbundling is technically feasible.	Tamplin

ISSUE	FCC RULES	AT&T WITNESS
12. Should AT&T be allowed to combine BellSouth's unbundled network elements in any manner it chooses, including recreating BellSouth services?	AT&T may combine BellSouth's unbundled network elements in any way it chooses, including the re-creation of existing BellSouth services.	Tamplin
13. Is it appropriate for BellSouth to provide copies of engineering records that include customer specific information with regard to BellSouth's poles, ducts, and conduits? How much capacity, if any, is appropriate for BellSouth to reserve with regard to its poles, ducts, and conduits?	BellSouth must provide requesting carriers copies of maps, plats and other relevant records, subject to a protective order. BellSouth may not reserve any capacity for its own future needs at the expense of AT&T's current needs.	Tamplin
14. What are the appropriate standards, if any, for performance metrics, service restoration, and quality assurance related to services provided by BellSouth for resale and for network elements provided to AT&T by BellSouth?	The FCC rules require BellSouth to provide AT&T with services, network elements and interconnection that are at least equal in quality to that which BellSouth provides itself.	Shurter
15. Do the provisions of Sections 251 and 252 apply to the price of exchange access? If so, what is the appropriate price for exchange access?	BellSouth may not assess interstate or intrastate access charges on a purchaser of network elements except to the extent the purchaser uses unbundled local switching for interexchange calls. In that circumstance, BellSouth may assess certain interstate access charges until the earlier of: (1) June 30, 1997; (2) the FCC reforms interstate access charges; or (3) BellSouth is authorized within Florida to offer in-region interLATA service.	Ellison Gillan Kaserman
16. Should BellSouth be required to provide real-time and interactive access via electronic interfaces, as requested, to perform the following: <ul style="list-style-type: none"> Pre-Service Ordering; Service Trouble Reporting; Service Order Processing and Provisioning; Customer Usage Data Transfer; Local Account Maintenance? If this process requires the development of additional capabilities, in what timeframe should they be deployed? What are the costs involved and how should these costs be recovered?	BellSouth must provide AT&T with access to operations support systems that is equal or superior to the access that BellSouth provides itself, unless BellSouth proves that such access is not technically feasible. BellSouth must provide AT&T such access by January 1, 1997.	Shurter

ISSUE	FCC RULES	AT&T WITNESS
17. Should BellSouth be required to utilize CMDS process for local and intraLATA calls as is used today for interLATA calls?	Not addressed.	Ellison
18. Should BellSouth be required to provide copies of all interconnection agreements entered into between BellSouth and other carriers, including other LECs and including those agreements entered into before the Act was enacted?	BellSouth must make all interconnection agreements available to other carriers.	Shurter
19. What billing system and what format should be used to render bills to AT&T for services and elements purchased from BellSouth?	The FCC does not address this specific issue, but the FCC requires BellSouth to provide services and elements under terms and conditions that are just, reasonable and non-discriminatory.	Shurter
20. Should BellSouth be required to provide Process and Data Quality Certification for carrier billing, data transfer, and account maintenance similarly with access billing and toll billing?	The FCC did not address this specific issue, but the FCC's concept of parity requires such certifications.	Shurter
21. Should BellSouth be required to provide interim number portability solutions in addition to remote call forwarding? If yes, what are the costs involved and how should they be recovered?	The FCC Order refers to a prior FCC Order that required ILECs to implement interim number portability through remote call forwarding, direct inward dialing or other comparable methods, if technically feasible.	Tamplin
22. What are appropriate general contractual terms and conditions that should govern the arbitration agreement (e.g., resolution of disputes, performance requirements, and treatment of confidential information)?	The FCC did not address these specific issues, but the FCC requires BellSouth to provide services, interconnection, and unbundled elements at terms and conditions that are just, reasonable and non-discriminatory.	Shurter
23. Should BellSouth be required to allow AT&T to appear on the white and yellow page directories (e.g., logo or name)?	The FCC did not address this specific issue, but the FCC's concept of parity and branding requires equal directory access.	Shurter