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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)	DOCKET NO. 960786-TL
Telecommunications, Inc. entry into)	
InterLATA services pursuant to Section)	FILED: July 31, 1997
271 of the Federal Telecommunications)	
Act of 1996.)	
)	

REBUTTAL TESTIMONY OF LANS CHASE
ON BEHALF OF INTERMEDIA COMMUNICATIONS INC.

Counsel for Intermedia Communications Inc.:

Patrick K. Wiggins
 Donna L. Canzano
 WIGGINS & VILLACORTA, P.A.
 501 East Tennessee Street
 Suite B, P.O. Drawer 1657
 Tallahassee, Florida 32302
 (904) 222-1534
 (904) 222-1689 (facsimile)

Jonathan E. Canis
 Enrico C. Soriano
 KELLEY DRYE & WARREN LLP
 1200 19th Street, N.W.
 Suite 500
 Washington, D.C. 20036
 (202) 955-9600
 (202) 955-9792 (facsimile)

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1 Q: Please state your name and on whose behalf you are
2 testifying.

3 A: My name is J. Lans Chase. My address is 135 West
4 Central Boulevard, Suite 1050, Orlando, Florida 32801.
5 I am testifying on behalf of Intermedia Communications
6 Inc. (Intermedia).

7 Q: Did you previously file in this docket direct
8 testimony concerning Issue 15 (resale)?

9 A: Yes.

10 Q: What is the purpose of your rebuttal testimony?

11 A: The purpose of this testimony is to rebut the
12 testimony of witness Gloria Calhoun and other
13 BellSouth witnesses to the extent they argue that
14 there is parity between BellSouth and ALECs with
15 respect to pre-ordering and ordering functions in the
16 resale market. In my direct testimony I provided a
17 simple description of the problems Intermedia has
18 encountered in converting BellSouth customers to
19 Intermedia resale customers. To reiterate, I believe
20 these the problems establish beyond reasonable debate
21 that Intermedia does not enjoy parity with BellSouth
22 in the conversion of a resale customer from one
23 company to the other. BellSouth seems to suggest,
24 however, that some systems it has recently introduced
25 solve these problems, and that parity has been
26 achieved. I disagree.

1 Q: Is it your testimony that BellSouth has not made
2 progress in OSS for resale orders?

3 A: No. BellSouth has made progress. I do not want to
4 minimize the task before BellSouth in achieving
5 parity, nor the effort it has put into developing
6 workable mechanical and electronic interfaces with
7 ALECs. But we do not yet enjoy parity with BellSouth.
8 Rather we have options by which we can perform pre-
9 ordering and ordering functions, and at present we
10 often must use one system for pre-ordering and another
11 system for ordering. In the context of OSS, BellSouth
12 is the vendor and ALECs such as Intermedia are the
13 customers. As BellSouth progresses, that is, as it
14 introduces new developments to resolve the limitations
15 of its current OSS, Intermedia and other ALEC
16 customers will work to adapt to these new
17 developments, as well as the offerings of other ILECs.

18
19 Q: One of the systems BellSouth seems to claim delivers
20 parity is its Local Exchange Navigation System (LENS).
21 Do you agree?

22 A: No. As I noted in my direct testimony, this system is
23 still in its infancy and is limited both in its pre-
24 ordering and ordering functionality. To reiterate,
25 LENS only allows 4 type of orders: switch "As-Is",
26 switch-as-specified, total disconnects, or brand new

1 service at an address where there is currently no
2 working service. Therefore, LENS will not allow
3 Intermedia to place orders to change the long distance
4 PIC or to add call waiting. This type of order must
5 be placed using EDI. LENS is primarily a pre-ordering
6 interface and this is how Intermedia uses it.

7 **Q: Does Intermedia currently use LENS to perform**
8 **pre-ordering functions for all of the BellSouth**
9 **services it would resell?**

10 **A:** No. Intermedia now uses LENS for pre-ordering of
11 "Move, Add, or Change" (MAC) orders only.
12 Unfortunately, LENS is limited here as well because it
13 does not allow Intermedia to reserve more than 6
14 telephone numbers. This is a major problem when using
15 LENS to perform pre-ordering functions for MAC orders.

16 **Q: Could Intermedia use LENS for pre-order activity with**
17 **"As-Is" conversions?**

18 **A:** Yes, we could but at this time we do not. The initial
19 switch "As-Is" orders do not require as much pre-order
20 activity because this order simply involves switching
21 the service exactly as it is today. For these
22 conversions, Intermedia uses the IC/REF
23 (Interconnection Reference External Customer
24 Validation) system to verify the address and the
25 BellSouth PIC Care (Character User Interface) system
26 to verify the main account number. That is all of the

1 pre-ordering that is necessary on a switch "As-Is"
2 order, and there is no advantage at this time to use
3 LENS for this purpose.

4 Q: Let's address the use of LENS for placing resale
5 orders with BellSouth. Does Intermedia currently use
6 LENS to perform the ordering functions for all of the
7 BellSouth services it would resell?

8 A: No. As discussed in my direct testimony, Intermedia
9 cannot use LENS to perform MAC orders. LENS does not
10 currently have that capability. It is my
11 understanding that Intermedia could use LENS to do a
12 switch "As-Is" order for most of the non-complex
13 services, but again there are limitations. For
14 example, Intermedia could not use LENS to order call
15 waiting on a line because LENS does not have that
16 capability, but instead Intermedia would have to use
17 EDI to place that order.

18 Q: Let's turn our attention to EDI. Does Intermedia
19 currently use EDI to perform pre-ordering functions
20 for all of the BellSouth services it would resell?

21 A: No. EDI is not capable of providing pre-ordering
22 functions. The Ordering and Billing Forum (OBF) is
23 currently looking into developing pre-ordering
24 standards and is considering EDI as one of the
25 choices. Currently, however, for any order placed
26 through EDI, Intermedia must use the LENS, IC REF, or

1 PIC Care system to do the pre-order function. For
2 example, if the customer wants to add call waiting and
3 call forwarding variable to an existing line,
4 Intermedia would have to use LENS to validate the
5 address and to check feature availability for that
6 central office, and then in a separate step use that
7 information to place the order through EDI.

8 **Q: Does Intermedia currently use EDI to perform ordering**
9 **functions for all BellSouth services it would resell?**

10 **A:** No. Not all of the service Intermedia resells are
11 available for ordering using EDI. Intermedia is
12 currently performing end-to-end testing with BellSouth
13 using the Harbinger EDI software. Intermedia will use
14 the EDI to place its switch "As-Is" and MAC orders for
15 the services that EDI will support. Nevertheless,
16 complex or designed services must be ordered through
17 the Interconnection Services Account Team. For
18 example, Intermedia can place a switch "As-Is" order
19 using EDI for an account with 5 business lines.
20 However, if Intermedia wanted to enter a switch "As-
21 Is" order for a MultiServ account, it would have to be
22 submitted on the standard paper LSR to the
23 Interconnection Services Account Team.

24 **Q: Returning to LENS for a moment, on page 10, lines**
25 **13-19, Ms. Calhoun testifies in part that "(f)rom the**
26 **customer's perspective, pre-ordering interactions with**

1 an ALEC using LENS are indistinguishable from
2 pre-ordering interactions with BellSouth" Is
3 it your experience that customers cannot distinguish
4 the pre-ordering functions from Intermedia's use of
5 LENS with BellSouth?

6 A: No. If all we were talking about were switch "As-Is"
7 of the very simplest residential and business
8 services, such as single line residential with no
9 features, then perhaps a customer could not
10 distinguish pre-ordering interactions with us from
11 those of BellSouth. We simply have no experience to
12 either challenge or validate that claim. Where we do
13 have real world experience with LENS, however, we know
14 that this conclusion is wrong. For example, as already
15 noted Intermedia uses LENS primarily for MAC pre-order
16 activity. Intermedia cannot easily take the pre-order
17 information from LENS and process the actual order.
18 Rather, an Intermedia employee must take the print-out
19 of the address, features, and numbers and either
20 complete the paper LSR or enter the information into
21 the EDI software. This cannot be done with a customer
22 waiting on the telephone. In sum, with LENS (as with
23 EDI), we still have to perform too much manual
24 intervention and re-keying of information to process
25 an order.

26 Q: But doesn't Ms. Calhoun state (page 11, lines 5-14),

1 that there are means for an ALEC to receive the pre-
2 order data in a format that would enable it to put the
3 information into its own OSS to avoid manual
4 intervention and re-keying?

5 A: Yes. This is so new, however, that it has not yet
6 been tested by Intermedia. Just as BellSouth as the
7 vendor has had time to develop its systems, ALECs as
8 the customers must have a reasonable amount of time to
9 develop their interfacing systems.

10 Q: In your direct testimony and in this rebuttal
11 testimony you make the point that currently pre-
12 ordering and ordering activities are cumbersome for
13 the majority of the services Intermedia would resell.
14 Ms. Calhoun seems to suggest that BellSouth labors
15 under the same limitations in terms of its own
16 internal systems. Do you agree?

17 A: No. On page 30 of Ms. Calhoun's direct testimony she
18 states that under the Direct Order Entry Application
19 Program (DSAP) due dates cannot be obtained separately
20 in pre-ordering and ordering functions, but rather
21 "DSAP must know which services are being ordered, and
22 must look at the entire order as a package." (lines
23 21-22) She then goes on to testify as follows:

24 . . . although DSAP does not
25 calculate a due date for a LENS
26 due date inquiry that is not

1 associated with an order, this is
2 not discriminatory. Due dates
3 are not calculated independently
4 of the ordering function for
5 BellSouth's retail customer's
6 either. (lines 22-25)

7 The problem with this statement is that a BellSouth
8 employee enters the order in totality and is able to
9 obtain a due date from the DSAP system. Since LENS
10 does not process firm orders for MAC, the ALEC must
11 wait for a FOC that contains the due date after the
12 order is sent via EDI or paper fax.

13 **Q: Attached to Mr. Stacy's testimony is EXH F, which is**
14 **labeled "Resale Parity Report." Please provide your**
15 **comments regarding the significance of this exhibit.**

16 **A: This chart is misleading because it measures**
17 **BellSouth's performance to provision service once the**
18 **order is completed in the BellSouth order systems.**
19 **The chart does not reflect the problems in entering**
20 **the ALEC's orders into BellSouth's order systems.**
21 **With resale, the fundamental disparity is in the pre-**
22 **ordering and ordering activities. We must ensure that**
23 **the ALEC enjoys parity with BellSouth in these**
24 **critical pre-ordering and ordering functions.**

25 **Q: Do you believe that LENS and EDI have been**
26 **sufficiently tested in the market to understand fully**

1 **their strengths and limitations?**

2 A: No. Although, Ms. Calhoun states that BellSouth has
3 tested its LENS and EDI systems, I believe that there
4 needs to be more extensive testing and performance
5 standards developed regarding access to BellSouth's
6 OSS systems for local resale. Intermedia is
7 encouraged that LENS and the Harbinger EDI software is
8 available; nevertheless we see these as just the
9 beginning of necessary access to OSS systems for
10 resale of BellSouth's local exchange services.

11 Q: Given that Intermedia is encouraged by the
12 introduction of LENS and EDI, why does Intermedia
13 continue to use the older, manual processes when these
14 better options are available?

15 A: We continue to use these older manual processes out of
16 necessity. It is in Intermedia's interest to fully
17 use BellSouth's OSS as soon as practical, and
18 Intermedia is working on this. But just as BellSouth
19 had to make the transition from manual systems to
20 electronic ones, so must Intermedia.

21 Q: **Is Intermedia devoting resources to this task?**

22 A: Yes. Intermedia is currently developing its OSS
23 systems for not only BellSouth, but for the other
24 ILECs with which it will do business. And with
25 respect to BellSouth's systems, they have only been
26 introduced recently. My understanding is that both

1 EDI and LENS were just introduced at the April
2 BellSouth/OLEC Conference. Moreover, Intermedia did
3 not gain access to LENS until mid-May at the first
4 LENS training session in Birmingham, Alabama. In any
5 event, as should be evident from this testimony
6 Intermedia is making the transition from using the
7 Printed LSRs to EDI and Intermedia is already using
8 LENS for pre-ordering.

9 Q: In conclusion, do you believe that BellSouth has
10 on-line full OSS for resale that is comparable to what
11 it enjoys internally?

12 A: No. Until the systems can be tested in full
13 production for a sufficient time period and until LENS
14 can be used for MAC orders, I do not believe that
15 BellSouth has provided non-discriminatory OSS for
16 resale services.

17 Q: Does this conclude your testimony?

18 A: Yes.

19

20

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25

26

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery* and/or Federal Express** this 31st day of July, 1997, to the following:

Floyd R. Self*
Norman H. Horton, Jr.
Messer, Caparello, Madsen,
Goldman & Metz
215 South Monroe Street
Post Office Box 1876
Tallahassee, FL 32302-1876

Andrew O. Isar**
Director-Industry Relations
Telecommunications Resellers
Assoc.
P.O. Box 2461
Gig Harbor, WA 98335-4461

Joseph A. McGlothlin*
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

C. Everett Boyd, Jr.*
Ervin, Varn, Jacobs,
Odom & Ervin
P.O. Drawer 1170
Tallahassee, FL 32302

Charles J. Beck*
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Robert G. Beatty*
J. Phillip Carver c/o
Nancy H. Sims
Southern Bell Telephone
Company
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Laura L. Wilson*
Charles F. Dudley
Florida Cable Telecommunications
Association
310 North Monroe Street
Tallahassee, FL 32301

Monica Barone*
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Rick Melson*
Hopping Green Sams & Smith
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314

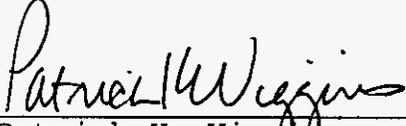
Richard M. Rindler**
Swidler & Berlin, Chartered
3000 K. Street, N.W.
Suite 300
Washington, D.C. 20007

Marsha E. Rule*
AT&T
101 N. Monroe, Suite 700
Tallahassee, FL 32301

Kenneth A. Hoffman*
William B. Willingham
Rutledge, Ecenia, Underwood,
Purness & Hoffman
215 South Monroe Street
Suite 420
Tallahassee, FL 32301-1841

Nancy B. White**
William Allenberg
BellSouth Telecommunications,
Inc.
Suite 4300
Atlanta, GA 30375-0001

Peter M. Dunbar*
Robert S. Cohen
Pennington, Culpepper, Moore,
Wilkinson, Dunbar & Dunlap
Post Office Box 10095
Tallahassee, FL 32302


Patrick K. Wiggins

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery* and/or Federal Express** this 31st day of July, 1997, to the following:

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Goldman & Metz
215 South Monroe Street
Post Office Box 1876
Tallahassee, FL 32302-1876

Laura L. Wilson*
Charles F. Dudley
Florida Cable Telecommunications
Association
310 North Monroe Street
Tallahassee, FL 32301

Andrew O. Isar**
Director-Industry Relations
Telecommunications Resellers
Assoc.
P.O. Box 2461
Gig Harbor, WA 98335-4461

Monica Barone*
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Joseph A. McGlothlin*
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Rick Melson*
Hopping Green Sams & Smith
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314

C. Everett Boyd, Jr.*
Ervin, Varn, Jacobs,
Odom & Ervin
P.O. Drawer 1170
Tallahassee, FL 32302

Richard M. Rindler**
Swidler & Berlin, Chartered
3000 K. Street, N.W.
Suite 300
Washington, D.C. 20007

Charles J. Beck*
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

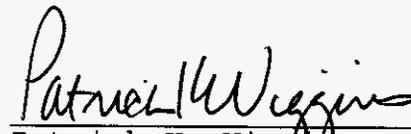
Marsha E. Rule*
AT&T
101 N. Monroe, Suite 700
Tallahassee, FL 32301

Robert G. Beatty*
J. Phillip Carver c/o
Nancy H. Sims
Southern Bell Telephone
Company
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Kenneth A. Hoffman*
William B. Willingham
Rutledge, Ecenia, Underwood,
Purness & Hoffman
215 South Monroe Street
Suite 420
Tallahassee, FL 32301-1841

Nancy B. White**
William Allenberg
BellSouth Telecommunications,
Inc.
Suite 4300
Atlanta, GA 30375-0001

Peter M. Dunbar*
Robert S. Cohen
Pennington, Culpepper, Moore,
Wilkinson, Dunbar & Dunlap
Post Office Box 10095
Tallahassee, FL 32302



Patrick K. Wiggles