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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF RONALD M. PATE
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000649-TP
September 7, 2000

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes. I filed direct testimony on August 17, 2000.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut the direct testimony of Mr. Don Price and Ms. Sherry Lichtenberg of MCImetro Access Transmission

1 Services, LLC and MCI WorldCom Communications, Inc. ("MCI").
2 Specifically, my comments respond to their direct testimony regarding
3 Issues Nos. 1, 80, 81, 90 ,91 and 96A.

4
5

6 ***Issue 1: Should the electronically ordered NRC apply in the event an***
7 ***order is submitted manually when electronic interfaces are not***
8 ***available or not functioning within specified standards or***
9 ***parameters?***

10

11 Q. PAGE 4 OF MR. PRICE ' S TESTIMONY SUGGESTS THAT
12 BELLSOUTH IS DISCRIMINATING AGAINST ALECS BY PROVIDING
13 ELECTRONIC ORDERING PROCESSES FOR ITS OWN RETAIL
14 OPERATIONS WHILE REQUIRING ALECS TO ORDER THE SAME
15 PRODUCTS AND SERVICES MANUALLY. DO YOU AGREE?

16

17 A. No. As stated in my direct testimony, neither MCI ' s petition nor Mr.
18 Price ' s direct testimony offers any specific information to support his
19 suggestion that BellSouth is acting in a discriminatory manner, and I
20 disagree strongly with this claim. I am not aware of any situation of the
21 type described by Mr. Price where " BellSouth does not provide
22 electronic ordering for ALECs for the service in question, but does
23 provide electronic ordering for itself." Thus, the issue referenced by
24 Mr. Price is not an issue at all.

25

1 Q. MR. PRICE, ON PAGE 4-5 OF HIS DIRECT TESTIMONY, STATES
2 "BELLSOUTH SHOULD NOT BE ENCOURAGED TO USE
3 INEFFICIENT, COSTLY SYSTEMS TO SERVE ALECS ...". PLEASE
4 COMMENT.

5
6 A. Again, I disagree strongly with the implication of Mr. Price's statement
7 that BellSouth uses "inefficient costly systems to serve ALECs" which
8 is not the case. BellSouth has provided the ALECs efficient, cost
9 effective and non-discriminatory access to its operations support
10 systems ("OSS") for pre-ordering, ordering, provisioning, maintenance
11 and repair, and billing through robust and reliable manual and electronic
12 interfaces. The electronic interfaces are: Local Exchange Navigation
13 System ("LENS"), Telecommunications Access Gateway ("TAG"),
14 RoboTAG, Electronic Data Interchange ("EDI"), Trouble Analysis
15 Facilitation Interface ("TAFI"), Electronic Communications Trouble
16 Administration ("ECTA"), Optional Daily Usage File ("ODUF"),
17 Enhanced Optional Daily Usage File ("EODUF"), and Access Daily
18 Usage File ("ADUF").

19
20 The interfaces for ALECs provide a full range of options from which to
21 choose including integratable machine-to-machine interfaces,
22 human-to-machine interfaces and manual interfaces. For whatever
23 reason, MCI has chosen to use the manual interfaces for UNE and
24 resale services, even when MCI could submit these orders
25 electronically. In spite of the availability of electronic interface capability,

1 MCI does not utilize these efficient and cost effective means to submit
2 their local service requests.

3

4

5 ***Issue 78: How should credit information be provided to MCIW?***

6

7 Q. WHAT IS BELLSOUTH' S POSITION ON THIS ISSUE?

8

9 A. It is BellSouth' s understanding that this issue has been resolved by the
10 parties; however, BellSouth reserves the right to file testimony on this
11 issue, should it be further disputed.

12

13

14 ***Issue 80: Should BellSouth be required to provide an application to***
15 ***application access service order inquiry process?***

16

17 Q. ON PAGE 4 OF HER DIRECT TESTIMONY, MS. LICHTENBERG
18 IMPLIES THAT MCI HAS USED ACCESS SERVICE REQUESTS
19 ("ASRs") TO ORDER UNBUNDLED NETWORK ELEMENTS, SUCH
20 AS ENHANCED EXTENDED LOOPS ("EELs"). IS MS.
21 LICHTENBERG CORRECT?

22

23 A. No. Notwithstanding any claim by Ms. Lichtenberg to the contrary, MCI
24 is not submitting an ASR to order EELs or any other unbundled network
25

1 elements. Rather, MCI is ordering Special Access service from an end
2 user's location to the MCI switch. BellSouth is provisioning and
3 installing Special Access and then manually crediting MCI monthly with
4 the difference between Special Access and UNE rates. BellSouth
5 defined a process whereby MCI can convert these from Special Access
6 to the UNE combination. To date, MCI has refused to make these
7 conversions.

8

9 Q. MS. LICHTENBERG STATES "SUCH AN APPLICATION-TO-
10 APPLICATION INQUIRY IS NEEDED TO OBTAIN PRE-ORDER
11 INFORMATION ELECTRONICALLY FOR UNES ORDERED VIA AN
12 ACCESS SERVICE REQUEST AND SHOULD BE PROVIDED."
13 PLEASE COMMENT.

14

15 A. Ms. Lichtenberg's claim that MCI needs an ASR interface in order "to
16 obtain pre-order information electronically for UNEs..." is wrong and
17 misleading. The Local Service Request ("LSR") is the industry-defined
18 means of ordering UNEs, not the ASR process. Each UNE offered by
19 BellSouth can be ordered via an LSR, and MCI need not utilize an ASR
20 to order any UNE, as Ms. Lichtenberg suggests. That MCI has
21 consistently resisted ordering EELs via an LSR does not require that
22 BellSouth enhance its ASR interface to facilitate MCI's purchase of
23 access services.

24

25

1 Q. WHAT DID THE COMMISSION IN DOCKET NO. 980281 SAY ABOUT
2 THE USE OF THE ASR PROCESS FOR ORDERING UNEs?

3

4 A. In its Order, the Commission ruled the ASR process was to be used as
5 an "interim interface, through the LCSC." This interim interface was
6 to be temporary until "BellSouth met its obligations to provide real time
7 interactive access to its OSS for pre-ordering and ordering via (an)
8 electronic interface as detailed in the agreement." The Commission
9 did not imply that all orders for UNEs had to have the capability of being
10 ordered electronically, but rather that BellSouth must implement real
11 time interactive interfaces at parity with what BellSouth utilizes for itself.
12 Since BellSouth does not have an electronic ordering interface for its
13 high capacity services, such as MegaLink service, an electronic
14 ordering interface for similar UNEs is not necessary to comply with the
15 Florida Public Service Commission's order. Therefore, there is no
16 requirement that MCI order EELs or any other UNE through the ASR
17 process.

18

19 Q. HAS THE FCC EXPRESSED ITS VIEW ON THE USE OF THE ASR
20 FOR ORDERING EELs?

21

22 A. Yes. In the FCC's Third Report and Order and the Supplemental
23 Order Clarification that followed, the FCC advised that the ASR process
24 was one method of ordering of EELs, and the conversion of Special
25 Access service to UNEs. In paragraph 298 of the Third Report and

1 Order, the FCC states: "If the EEL is available and a requesting carrier
2 seeks to serve a high volume business, the incumbent LEC can
3 provision the high capacity loop and connect directly to a requesting
4 carrier's collocation cage." MCI is not requesting that high capacity
5 loops be connected directly to its collocation space. MCI is ordering
6 Special Access service from an end user's location to the MCI switch.
7 Footnote 581 in FCC 98-238 states: "Furthermore, requesting carriers
8 and incumbent LECs have developed routine provisioning processes to
9 deploy the EEL using the ASR process, and thus requesting carriers
10 will not face delays and costs to integrate the EEL into their networks."
11 This footnote does not require BellSouth to provision these types of
12 loops using an ASR process. It simply observes that the ASR process
13 is one method for the provision of EELs.

14

15 Q. DOES AN APPLICATION-TO-APPLICATION PRE-ORDERING
16 INTERFACE EXIST FOR LSRs?

17

18 A. Yes. BellSouth provides ALECs with access to the same pre-ordering,
19 ordering and provisioning OSS accessed by BellSouth's retail
20 organizations through the machine-to-machine Telecommunications
21 Access Gateway ("TAG") electronic interface. BellSouth supplies
22 ALECs with all the specifications necessary for integrating the pre-
23 ordering functionality of TAG with the ordering functionality of other
24 electronic interfaces. An ALEC may integrate the TAG pre-ordering
25 interface with the Electronic Data Interchange ("EDI") ordering

1 interface or with the TAG pre-ordering with TAG ordering. ALECs
2 interested in integrating the pre-ordering and ordering functionality of
3 the interfaces have responsibility for performing that integration.

4
5 Q. CAN THE TAG PRE-ORDERING INTERFACE BE INTEGRATED
6 WITH AN ASR?

7
8 A. Yes. MCI would have to do the integration on their side of the interface.
9 Thus, what MCI is requesting in an application-to-application interface
10 for access service requests for local services already exist. However,
11 once again, the ASR is not the mechanism for ordering local services.

12
13
14 **Issue 81: *Should BellSouth provide a service inquiry process for local***
15 ***services as a preordering function?***

16
17 Q AS YOU UNDERSTAND MCI' S REQUIREMENTS, WILL
18 BELLSOUTH' S DETAILED LOOP MAKE-UP INFORMATION AS A
19 PRE-ORDERING FUNCTION VIA THE SERVICE INQUIRY ("SI"), IN
20 ITSELF, SATISFY MCI?

21
22 A. No. My testimony of August 17, 2000 described BellSouth' s plans and
23 procedures to satisfy the 319 Remand Obligations regarding Loop
24 Qualification. With that background, I do not think that this SI process
25 will satisfy all of MCI' s requirements as stated. MCI is asking for

1 manual and electronic SI processes for the pre-ordering of local
2 services that would indicate whether facilities are available to serve an
3 end user, information regarding redundancy, and possibly other
4 information to be specified by MCI.

5

6 Q. IS MCI'S REQUEST A FUNCTION OF PRE-ORDERING AS DEFINED
7 BY THE FCC?

8

9 A. No. Pre-ordering deals with the collection of information necessary to
10 populate an order for resale services or UNEs. MCI's request deals
11 with the gathering of data to have assurance of facilities availability for
12 the purpose of developing sales proposals. That was not contemplated
13 by the Act and as such BellSouth has no statutory requirement to
14 provide such.

15

16 Q. IS BELL SOUTH NECESSARILY OPPOSED TO PROVIDING MCI
17 WITH A SERVICE INQUIRY PROCESS THAT WOULD ENABLE MCI
18 TO GATHER INFORMATION TO DEVELOP SALES PROPOSALS?

19

20 A. No. Even though BellSouth is not required to develop the process
21 proposed by MCI, BellSouth has no objection to this issue being
22 considered by the industry through the Change Control Process
23 ("CCP"). The CCP is the process by which BellSouth and participating
24 ALECs manage requested changes to the BellSouth Local Interfaces,
25 the introduction of new interfaces, and the identification and resolution

1 of issues related to Change Requests. This process covers Change
2 Requests initiated by both BellSouth and ALECs that affect external
3 users of BellSouth's electronic interface applications and/or,
4 associated manual processes

5
6 BellSouth and representatives of the ALECs will meet to review,
7 prioritize, and make recommendations for candidate Change Requests.
8 Through this process the input from all interested ALECs is considered
9 and the decisions that result will best serve the ALEC community as a
10 whole.

11 The CCP process is described in the BellSouth Website:

12 http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp.html

13
14 The ALEC industry should have the opportunity to decide whether
15 MCI's proposed service inquiry process would be beneficial to
16 promoting local competition and the extent to which this process should
17 be given priority over other changes to BellSouth's interfaces currently
18 under discussion.

19

20

21 ***Issue 83: Should BellSouth be required to provide downloads of the***
22 ***RSAG database without license agreements?***

23

24 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

25

1 A. It is BellSouth's understanding that this issue has been resolved by the
2 parties; however, BellSouth reserves the right to file testimony on the
3 issue, should it be further disputed.

4

5

6 ***Issue 89: When BellSouth rejects an MCIW order, should it be required to***
7 ***identify all errors in the order that would cause it to be rejected***

8

9 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

10

11 A. It is BellSouth's understanding that this issue has been resolved by the
12 parties; however, BellSouth reserves the right to file testimony on the
13 issue, should it be further disputed.

14

15

16 ***Issue 90: Should BellSouth be required to provide completion notices for***
17 ***manual orders?***

18

19 Q. ON PAGE 14 OF HER DIRECT TESTIMONY, MS. LICHTENBERG
20 STATES " PROVIDING COMPLETION NOTIFICATION VIA CSOTS...
21 WOULD BE COSTLY AND INEFFICIENT FOR WORLDCOM" .
22 PLEASE COMMENT.

23

24 A. I find it somewhat confusing that Ms. Lichtenberg accepts fax and e-
25 mail completions on manual orders in New York and Texas, which

1 requires manual handling and processing within MCI, yet she does not
2 want MCI to expend any effort to obtain the same type information from
3 the BellSouth CLEC Service Order Tracking System ("CSOTS"). The
4 effort to receive and process a manual completion notice by MCI for
5 New York and Texas would seem to be more costly and inefficient to
6 MCI than accessing the CSOTS web-based electronic interface.

7
8 CSOTS, which has been successfully serving ALECs since December
9 1999, allows ALECs to view service orders on-line, track orders, and
10 determine the status of their service orders. It permits MCI to obtain the
11 completions information promptly, avoids transcription and other clerical
12 type errors characteristic of manually transmitting information via
13 facsimile or e-mail, and involves fewer people in the process.

14

15 Q. HOW OFTEN WOULD MCI NEED TO ACCESS CSOTS TO OBTAIN
16 UPDATED COMPLETION STATUS ON ITS ORDERS?

17

18 A. Accessing CSOTS once a day would provide MCI with the needed
19 information concerning completion of orders. As CSOTS accesses the
20 Service Order Communications System ("SOCS") for its information,
21 SOCS is updated nightly with those orders that have been completed.

22

23 As detailed on pages 11 through 13 of the CLEC Service Order
24 Tracking System Users Guide, which was provided as Exhibit RMP-3 in

25

1 my direct testimony, an ALEC can easily retrieve a Service Order
2 Status report.

3 This report provides a matrix by order status of the number of service
4 orders existing within each status category. The order statuses as
5 noted on page 12 of the Users Guide are as follows:

6 PD – Pending Dispatch

7 PF – Pending Facilities

8 AO – Assignable Order

9 MA – Missed Appointment

10 CA – Cancelled

11 CP – Completed

12

13 Simply by clicking on anyone of the above order status categories, all
14 service orders will be shown for that status category. Thus, MCI can
15 easily access all service orders in a completed (CP) status.

16

17 Q. WAS CSOTS DEVELOPED FOR THE PURPOSE OF PROVIDING
18 COMPLETION NOTICES?

19

20 A. No. While that is one of the attributes of CSOTS, its benefits to ALECs
21 are far more encompassing. CSOTS was initially designed based on
22 ALECs desire to see their orders as being provisioned by the BellSouth
23 downstream system. CSOTS allows the ALESc to view the service
24 order as it exists in BellSouth's SOCS. As such this allows ALECs to
25 get the current status on the order of which completions is one type of

1 status. Other statuses are detailed in the manner that allows the ALEC
2 to follow its orders from initial acceptance through completion. In
3 addition, CSOTS provides summary reports by order status, by state or
4 for the BellSouth region.

5

6 CSOTS was designed with input from the ALEC community and is
7 currently managed under the Change Control Process. In summary,
8 CSOTS is a comprehensive operational tool for tracking service orders
9 and was developed solely for the benefit of the ALEC community.

10

11 Q IS BELLSOUTH NECESSARILY OPPOSED TO PROVIDING
12 COMPLETION NOTICES ON MANUALLY SUBMITTED LSRs?

13

14 A. No. Even though BellSouth is not required to provide completion
15 notices on manually submitted LSRs, BellSouth has no objection to this
16 issue being considered by the ALEC industry through the CCP. The
17 CCP is the appropriate industry forum to review, assess, and prioritize
18 changes to the BellSouth interfaces, particularly since CSOTS is one of
19 the interfaces managed by the CCP.

20

21

22 ***Issue 91: What intervals should apply to FOCs? Should BellSouth be***
23 ***required to check facilities before returning an FOC?***

24

25

1 Q. WHAT ARE YOUR CONCERNS WITH MS. LICHTENBERG' S
2 PROPOSED INTERVALS FOR FIRM ORDER CONFIRMATIONS
3 (" FOCs")?
4

5 A. Without consideration for MCI' s desire for facilities confirmation, Ms.
6 Lichtenberg' s proposal fails to consider the quantity of services that
7 may be requested. A FOC interval of two business days for a single
8 DS0 service request is far different than a two-business day FOC
9 interval for fifteen DS0 services ordered at one time for the same
10 location(s). Ms. Lichtenberg would assign two business days to any
11 quantity of network elements ordered by MCI. The same concerns
12 exist for the proposal for a three business day FOC interval for DS3
13 services. This interval also fails to consider the quantity issue. In
14 addition, it does not consider time for an inquiry of available facilities
15 currently performed through the Service Inquiry (" SI") process which is
16 required for DS3 services.
17

18 Q. IS MCI BEING CONSISTENT WITH ITS PROPOSED FOC
19 INTERVALS?
20

21 A. No. While requesting shorter FOC intervals, Ms. Lichtenberg wants
22 BellSouth to check facilities before returning the FOC to MCI. As
23 described in my testimony of August 17, 2000 page 31, the FOC
24 interval would be increased if BellSouth checked facilities before
25 returning a FOC to MCI, which is just the opposite of what MCI

1 apparently desires. Furthermore, BellSouth does not check facilities
2 for its retail customers, and there is no requirement that BellSouth do so
3 for MCI.

4

5 Q. IF MCI WERE TO AGREE TO AN EXTENDED FOC INTERVAL IN
6 ORDER TO HAVE FACILITY CONFIRMATION, WOULD BELLSOUTH
7 AGREE TO SUCH AN ARRANGEMENT?

8

9 A. No. Under the Telecommunications Act, BellSouth is obligated to provide
10 processes for pre-ordering, ordering, maintenance and repair, and billing at
11 parity for all ALECs. Thus the preferential treatment being requested
12 by MCI could not be developed without making such available to all
13 ALECs. As discussed in my direct testimony, since BellSouth does not
14 confirm facilities as part of pre-ordering for its retail units, except where
15 an SI is required, there is no requirement that BellSouth provide this
16 functionality for MCI or any other ALEC.

17

18 In addition, the operational processes of the Local Carrier Service
19 Center ("LCSC") are designed for a mass production environment.
20 Today, BellSouth receives monthly, on average, in excess of 250,000
21 LSR submissions of which 80% are submitted electronically.

22 Confirmation of facilities would inject an additional process step that
23 would significantly impact BellSouth's efficiency and costs of order
24 processing.

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Issue 96A: Should BellSouth be required to provide customer service record (CSR) information in a format that permits its use in completing an order for service?

Q. ON PAGE 17 OF HER TESTIMONY, MS. LICHTENBERG STATES "BELLSOUTH TODAY USES CSR INFORMATION TO POPULATE AUTOMATICALLY ORDERS IN ITS OWN ORDERING SYSTEM". PLEASE COMMENT.

A. Ms. Lichtenberg's statement is correct. However, she does not properly portray this as it relates to the issue presented by MCI. As discussed in my direct testimony, BellSouth provides ALECs with the same stream of data for the CSR that BellSouth provides to its retail units. BellSouth uses parts of that information to pre-populate an order that is acceptable by the Service Order Communications System ("SOCS") for further provisioning downstream. MCI's issue deals with a further sub-line level of parsing that goes beyond what is needed to process an order in SOCS.

Q. ON PAGE 17 OF HER DIRECT TESTIMONY, MS. LICHTENBERG SUGGESTS THAT BELLSOUTH SHOULD UTILIZE THE CHANGE CONTROL PROCESS TO DEVELOP PARSING FOR CSRS. PLEASE COMMENT.

1 A. That is exactly what BellSouth is doing. As explained in my direct
2 testimony, a Change Request currently is open in CCP for the parsing
3 of CSRs. A team is to be formed to assess the feasibility of
4 implementing the parsing capability being requested by MCI. Other
5 ALECs have expressed a similar interest and the CCP is the proper
6 industry forum for the resolution of this issue. This will ensure input
7 from all interested ALECs participating in CCP in order that the best
8 solution for the community as a whole can be evaluated.

9
10 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

11 A. Yes.
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