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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 900646-TP
SEPTEMBER 9, 1996

Q. Please state your name, address and position with BellSouth Telecommunications, Inc. ("BellSouth" or "The Company").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am a Director - Strategic Management for BellSouth Telecommunications, Inc. I have served in this role since February, 1996 and have been involved with the management of certain issues related to local interconnection and unbundling.

Q. Please summarize your background and experience.

A. I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina in 1970 with an Associate of Applied Science in Business Administration degree. I also have a Master of Business Administration Degree from Georgia State University in Atlanta, Georgia. I am also a member of Beta Gamma Sigma, the national honor society for business school graduates.

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My business career spans 26 years and includes responsibilities in the areas of network planning, engineering, training, administration and operations. I have held positions of significant responsibility with a local exchange telephone company, a long distance company and a research and development laboratory. I have extensive experience in all phases of telephonic network planning, deployment and operation (including research and development) in both the domestic and international arenas.

I began my career with Southern Bell (now BellSouth) in 1970 as a Traffic Engineer for switches in North Carolina. My responsibilities included planning and switch engineering and for providing network administrative staff support. In 1974, I was assigned to Southern Bell Company Headquarters in Atlanta, Georgia where I provided technical support to network administration groups. I was also part of a team that implemented mechanized data collection and processing systems (Total Network Data System) used by Network personnel throughout Southern Bell. I joined Southern Bell's technical training organization where I developed and delivered technical training to managers in the Network Department. I was concurrently responsible for curriculum planning for administration and engineering job disciplines. In 1978 I joined Southern Bell's Engineering Department in Miami, Florida where I managed a group of management network design engineers. Based on my extensive knowledge of mechanized support systems, I formed and

1 led a new group responsible for planning and implementing all
2 Operations Support Systems in South Florida. In 1981, I joined
3 Southern Bell's Network Operations Department where I led an
4 operations center responsible for installation and maintenance of central
5 office equipment for special services, message trunking and digital
6 carrier systems in large metropolitan switching centers in the South
7 Florida Area. I also managed a group which provided switching system
8 administration, service analysis and performance monitoring for a major
9 portion of South Florida. In 1982 I joined AT&T as part of its
10 Divestiture Planning Team in Basking Ridge, New Jersey. I served as
11 Technical Expert for switching network planning and engineering. This
12 team developed and implemented intercompany contracts representing
13 about \$1 Billion per year in contract billing between AT&T and the
14 Operating Companies. Upon Divestiture in 1984, I joined Bell
15 Communications Research as a Member of Technical Staff and was
16 responsible for systems engineering for digital switching systems
17 (Lucent Technologies 5ESS and Nortel DMS-100). I developed
18 computerized engineering and administration tools. I also developed
19 and conducted load capacity and regression analyses to determine
20 switch performance with various methods of load and computer memory
21 management. During that assignment I won the Bell Communications
22 Research Award for Excellence for my research in digital switching
23 technology.

24
25

1 In 1986 I returned to BellSouth in Atlanta, Georgia where I joined the
2 Network Planning and Engineering Department. I developed and led
3 the New Service Planning and Network Architecture Planning Group.
4 This group was responsible for financial and technical evaluations as
5 well as funding and deployment coordination. In 1993 I joined
6 BellSouth International as Associate Director for Operations. In this role
7 I was responsible for business planning and implementation activities for
8 national and international long distance markets. I was responsible for
9 regulatory and interconnection planning activities in BellSouth's
10 successful bid for a long distance license in Chile. I served as a key
11 member of that implementation team. In 1994 I returned to BellSouth
12 Telecommunications, Incorporated as Director - Access Customer
13 Advocate Centers. In this role I directed the implementation and
14 operation of three customer operations centers for key access
15 customers (AT&T, MCI, and all Wireless Customers). I led a large team
16 of managers and technicians which provided provisioning and
17 maintenance of switched and special access services across a nine-
18 state region.

19

20 Q. Have you testified previously before any state public service
21 commission; and if so, briefly describe the subject of your testimony.

22

23 A. I have testified before the state Public Service Commission in Georgia
24 on the issue of technical capabilities of the switching and facilities

25

1 network regarding the introduction of new service offerings, expanded
2 calling areas, etc.

3

4 Q. What is the purpose of your testimony in this proceeding?

5

6 A. The purpose of my testimony is to discuss the technical feasibility of
7 unbundling certain network elements as requested by MCI. The
8 following discussion is based on my understanding of MCI's request as
9 described in MCI's Petition For Arbitration in this proceeding. I may, in
10 the future, provide testimony in response to MCI testimony in this
11 proceeding.

12

13 Specifically, I will address the eight (8) network elements for which no
14 agreement between BellSouth and MCI has been reached. BellSouth
15 believes that these eight network elements are either (1) available at
16 present via BellSouth's tariffs or (2) cannot be made available because
17 there is no technically feasible method of providing such unbundling. I
18 will address the network elements in the following list:

19

20 Network Interface Device

21 Loop Distribution Media

22 Loop Concentrator/Multiplexer

23 Loop Feeder

24 Local Switching

25 Operator Systems

1 Dedicated Transport

2 Common Transport

3

4 Additionally, MCI has raised the issue of providing unbundled access to
5 certain capabilities referred to as Advanced Intelligent Network (AIN)
6 triggers. I will address that subject as well.

7

8 Finally, MCI has raised two issues that are procedural in nature. The
9 first issue concerns BellSouth's providing copies of engineering records
10 that include customer specific information with regard to BellSouth
11 poles, ducts and conduits. The second issue concerns the amount of
12 capacity that is appropriate for BellSouth to reserve with regard to its
13 poles, ducts and conduits. I will also address these issues.

14

15 Since the issues named above were raised in MCI's petition for
16 arbitration have been previously addressed in earlier testimony, I would
17 like to adopt by reference my Direct Testimony with exhibits filed August
18 12, 1996, in Florida Docket No. 960833-TP and my Rebuttal Testimony
19 with exhibits filed on August 30, 1996 in Florida Docket 960833-TP.

20

21 Q. Does this conclude your testimony?

22

23 A. Yes.

24

25