ORIGINAL

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF ENO LANDRY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 971140-TP

JANUARY 29,1998

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND EMPLOYMENT.

A. My name is Eno Landry. My business address is Suite 500, 3000 Riverchase Galleria, Birmingham Alabama. I am employed by BellSouth Telecommunications, Inc., hereinafter referred to as "BellSouth" or "the Company."

Q. PLEASE STATE YOUR BACKGROUND AND QUALIFICATIONS.

A. I have been employed by BellSouth for the past 24 years and have worked in various network capacities. For the past three years I have been responsible for the development of collocation and unbundled network element(UNE) provisioning and maintenance processes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to issue number 8 in this docket. I will discuss the provisioning process and the associated work activities as they relate to combinations of unbundled network elements and the generation of the appropriate non-recurring costs for those elements. Specifically, I discuss the major components and contributions to the nonrecurring costs associated with provisioning unbundled loops, ports and other transport items. During the course of my testimony, I will also identify and quantify the provisioning processes that are affected when certain combinations of unbundled elements are ordered together.

Q. CAN YOU ADDRESS THE SPECIFIC ASSUMPTIONS ASSOCIATED WITH ORDER NO. PSC-96-1579-FOF-TP AS IT RELATES TO THE DETERMINATION OF THE APPROPRIATE NON RECURRING COSTS?

A. Yes. The specific assumptions that affected the nonrecurring costs are as follows:

1. The loop and port orders would be submitted to BellSouth on one service request. However,

BellSouth must separate the request into two separate service orders, one for the loop and the associated cross connect, and one for the port and its associated cross connect. The requirement for two separate orders is driven by the established classes of service, and by the fact that the unbundled loop offerings are currently processed in an access billing system and the port offerings are processed by the non-access billing systems.

2. The hand off to the Alternative Local Exchange Company(ALEC) for the unbundled loop and the unbundled port will be to an ALEC space in the same wire center where the port and loop currently reside.

Q. **PLEASE DESCRIBE THE MAJOR COMPONENTS CONTRIBUTING TO THE NONRECURRING COSTS ASSOCIATED WITH UNBUNDLED ELEMENTS.**

A. The major components associated with turning up unbundled elements are as follows:

1. **Functions associated with performing physical work on the UNE.** These involve the basic work

functions which are required to ensure element functionality. They include the time to perform cross connects in the field, in the central office and at the customer's premises. If the service requires a central office collocation cross connect, then that work would also be reflected in the specific costs.

2. **Functions specifically requested by the ALECs.** These involve coordination of turn-up and testing of the unbundled components. They represent specific additional functions demanded by the ALECs in interconnect agreements.

3. **Functions associated with provisioning fallout.** These represent work activity where processes would normally be automated but because of errors on the service requests submitted by the ALECs, the service request must be processed manually. In the case of an unbundled element connected to a collocated provider, the UNE process has many similarities to the access process. The connectivity at an access Point Of Presence (POP) is similar to the meet point at the collocator's space. Both require specific

definition for ALEC facility assignment as well as for signaling and transmission level parameters. Although BellSouth continues to return provisioning errors to the inter-exchange carriers and to work with them in resolving these, but even after 10 years of ordering access services the carriers continue to submit service requests with a high error rate. We anticipate that the UNE process would carry at least as high an error rate. This error rate causes additional nonrecurring costs.

Q. PLEASE DESCRIBE THE MAJOR COMPONENTS CONTRIBUTING TO THE NONRECURRING COSTS ASSOCIATED SPECIFICALLY WITH UNBUNDLED PORTS.

A. The major components associated with turning up unbundled ports are as follows:

- Receiving the service request, which will contain the technical parameters of the service and will also contain the facility details indicating the specific interconnection to the ALEC.
- Processing the service request into an internal

service order.

- Allowing the service order to flow through the assignment systems so that the equipment and facilities that will be used to make the service work will be marked accordingly in the data bases.
- Making the physical connections between the switch port and the facilities that it will connect to.
- Processing the translations in the switch to make available the appropriate features, and to allow the end user to make properly routed phone calls.
- Testing the service to ensure functionality and compliance with agreements.
- Contact the ALEC to turn up the service.

Q. PLEASE DESCRIBE THE MAJOR ACTIVITIES CONTRIBUTING TO THE NONRECURRING COSTS ASSOCIATED WITH PROVISIONING THE LOOP.

A. The major activities associated with provisioning the loop are as follows:

- Receive the service request for the loop which

will include the technical parameters for the service and will also contain the facility details indicating the specific interconnection to the ALEC.

- Issue the service request and allow the downstream system to post the assignments on both the loop and the interconnecting facility. (Resolve fallout if required.)
- Design the service request. (Resolve fallout if required.)
- Issue the design information to the specific groups requiring that information to perform work on the service including the ALEC.
- Schedule and coordinate inside and outside work forces to turn up the service.
- Physically wire the loop to the central office facilities and to the interconnecting facility.
- Coordinate the physical work on both UNE elements.
- Test the service to ensure functionality. Some of the testing may be performed before the loop is actually terminated into the ALEC facility.
- Contact the ALEC to report service activation.

Q. CAN ONE SIMPLY ADD THE ACTIVITIES DESCRIBED ABOVE FOR LOOP AND PORT ACTIVITIES TO DETERMINE THE COSTS INVOLVED WHEN AN ALEC ORDERS COMBINATIONS OF NETWORK ELEMENTS ON THE SAME ORDER AS IDENTIFIED BY THE COMMISSION IN ORDER NO. PSC-96-1579-FOF-TP?

A. No. The coordination of service turn-up would occur only once, and the turn up testing would also include both elements in one series of tests. It is critical to note that these are two separate unbundled elements and carry many of the same costs as unrelated elements. The elements are processed and turned up as separate elements allowing the ALEC to make the final connection between the two. Because they are indeed two separate elements, they must each be able to stand alone for ordering, disconnecting, provisioning and maintenance.

Q. PLEASE DESCRIBE THE WORK FLOW INVOLVED WHEN AN ALEC ORDERS COMBINATIONS OF NETWORK ELEMENTS AS IDENTIFIED BY THE COMMISSION IN ORDER NO. PSC-96-1579-FOF-TP.

A. The activities required to process a single order for network combinations, such as a two wire analog loop and port are as follows:

For BellSouth, the process starts with receiving the service request from the ALEC. Then service orders must be developed that will drive the downstream systems and the physical work activities that must be done to treat an end-to-end service as two elements.

One component (the port) remains a switched based service but the loop has to be processed and inventoried as a non-switched based service since it cannot be associated with the telephone number of the port. This requires that the services actually be processed on two service orders.

In addition to inventorying the loop components, there are now either cross connects or other ALEC transport components associated with both the loop and port components which must be entered in databases. These transport components which allow for connectivity to the ALEC are additional components which must be taken through the assignment, design and provisioning processes. In addition to what I have discussed above, the issue of minimizing service down time for the end user becomes important because the service must be now interconnected through an ALEC transport. The time savings associated with this specific scenario is that

the coordination of the turn up of the service to the customer would be reduced slightly.

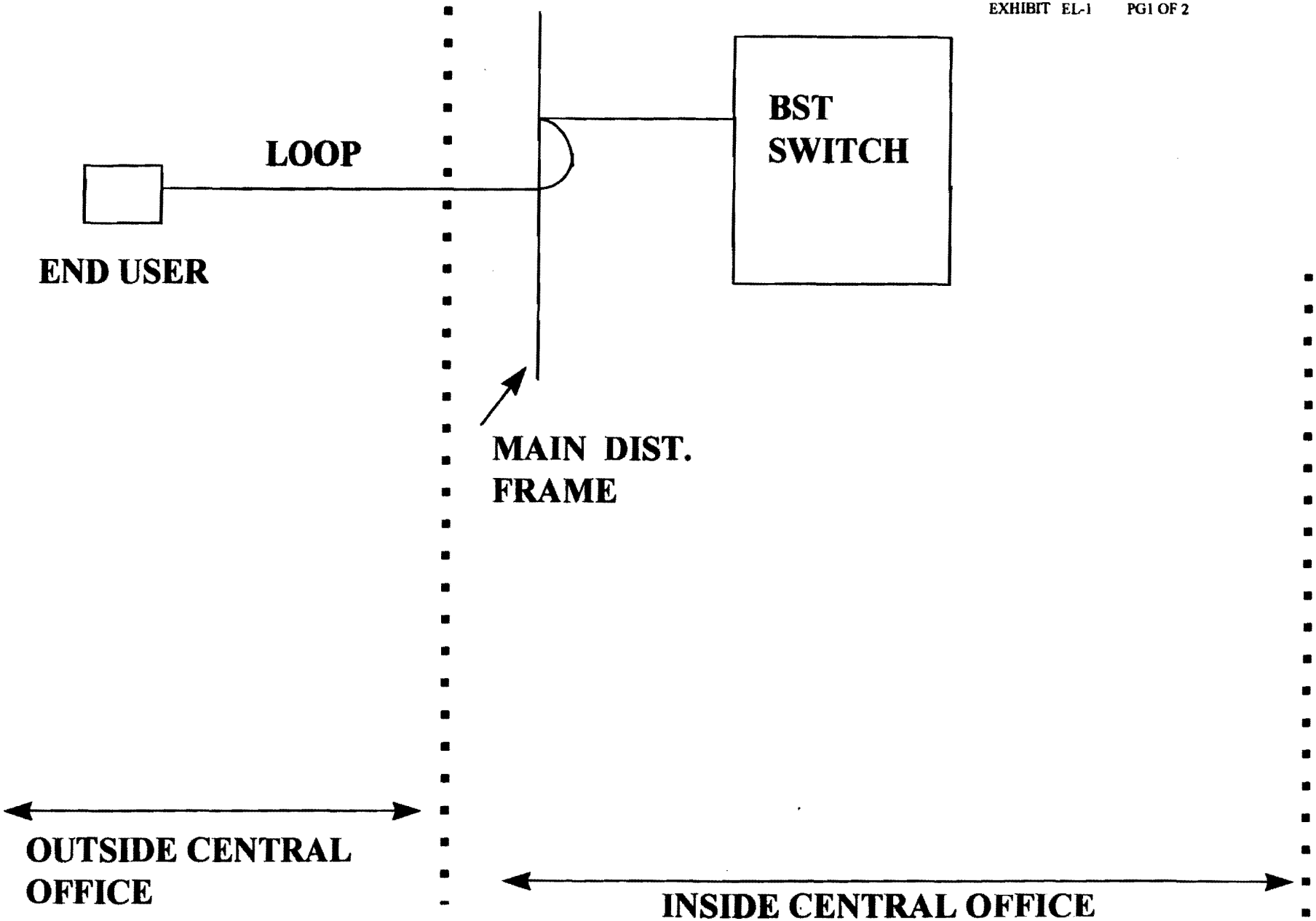
My exhibit EL-1 shows the changes that would be required to provision a loop and port as unbundled elements. Page 2 of that exhibit shows physical configuration associated with interconnection to a collocated space. Collocation involves additional costs which would have to be considered.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes it does.

VIEW OF END USER WITH BST SERVICE

BELLSOUTH TELECOMMUNICATIONS INC
FPSC DOCKET NO. 971140-TP
EXHIBIT EL-1 PG1 OF 2



VIEW OF END USER WITH ALEC UNE SERVICE