

SUZANNE FANNON SUMMERLIN
ATTORNEY AT LAW

ORIGINAL

1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301

TELEPHONE (850) 656-2288
TELECOPIER (850) 656-5589

April 15, 1998

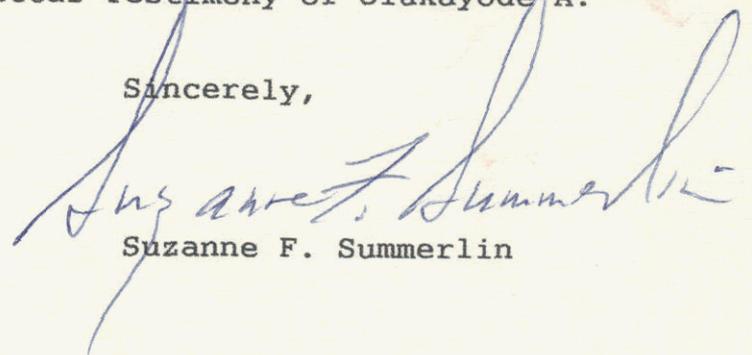
Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Docket No. 980119-TP - Complaint of Supra
Telecommunications & Information Systems, Inc., Against
BellSouth Telecommunications, Inc.

Dear Ms. Bayo:

Please find enclosed for filing in the above-referenced
docket an original and fifteen copies of Supra Telecommunications
& Information Systems, Inc.'s Rebuttal Testimony of Olukayode A.
Ramos.

Sincerely,



Suzanne F. Summerlin

- ACK _____
- AFA _____ SFS:ss
- APP _____ Enclosures (16)
- CAF _____
- CMU Dirisini
- CTR _____
- EAG _____
- LEG 2
- LIN 34 mg
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE
04309 APR 15 88
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

DOCKET NO. 980119-TP

REBUTTAL TESTIMONY OF OLUKAYODE A. RAMOS
SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.

April 15, 1998

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Olukayode A. Ramos. My business address is
2620 S.W. 27th Avenue, Miami, Florida 33133-3001.

Q. ARE YOU THE SAME OLUKAYODE A. RAMOS WHO PROVIDED DIRECT
AND AMENDED DIRECT TESTIMONY IN DOCKET NO. 980119-TP?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. My testimony addresses the direct testimony of BellSouth
witnesses W. Keith Milner and Patrick C. Finlen.

Q. WHAT IS YOUR GENERAL REACTION TO THE POSITIONS PRESENTED
IN MR. MILNER'S DIRECT TESTIMONY?

A. Mr. Milner's testimony states that the "vast majority of
issues raised by Supra are completely without merit or are
problems that were encountered early on and that have long
since been resolved by BellSouth." As is clear from the
testimony and exhibits filed by Supra in this proceeding,
the issues raised by Supra do have merit and have not been
resolved by BellSouth. Mr. Milner states that Supra has

DOCUMENT NUMBER-DATE

04309 APR 15 88

FPSC-RECORDS/REPORTING

1 failed to give any details of the problems it has
2 experienced with BellSouth. The testimony filed by Supra
3 provides many details regarding specific problems. Mr.
4 Milner states that BellSouth "admits its part to certain
5 isolated "start-up" problems and has taken appropriate
6 action not only to resolve the individual cases, but also
7 to correct any underlying procedural problems." As my
8 amended direct testimony and that of Mr. Bradford Hamilton
9 demonstrates, Supra has continued up to the present date to
10 experience serious ongoing difficulties with BellSouth in
11 numerous areas. Mr. Milner simply categorically states
12 that BellSouth is providing everything Supra requires under
13 the Interconnection Agreement. Mr. Milner cites to the
14 number of orders Supra has placed through LENS as support
15 that BellSouth has provided access to BellSouth's
16 Operational Support Systems without specifically addressing
17 the many crippling problems that Supra has experienced with
18 the submission of these orders as well as the fact that
19 BellSouth employees have required Supra to submit a
20 tremendous number of its orders manually.

21
22 Q. HOW DO YOU RESPOND TO MR. MILNER'S REFERENCE TO
23 BELLSOUTH'S ANALYSIS OF ITS PERFORMANCE TO SUPRA FOR THE
24 MONTHS OF NOVEMBER AND DECEMBER 1997 AND JANUARY 1998?

25 A. Mr. Milner does not provide the analysis BellSouth
26 performed, nor does he provide the measurements or data

1 utilized in this analysis. Even so, he admits that
2 BellSouth's provisioning performance to Supra was
3 substantially lower than that provided by BellSouth to its
4 own retail customers.

5
6 Q. HOW DO YOU RESPOND TO THE BALANCE OF MR. MILNER'S
7 TESTIMONY?

8 A. Mr. Milner makes very general statements that BellSouth
9 has acted appropriately in response to each issue. Supra's
10 amended direct testimony provides examples of the specific
11 deficiencies Supra has experienced in BellSouth's
12 performance.

13
14 Q. HOW DO YOU RESPOND TO PATRICK C. FINLEN'S DIRECT
15 TESTIMONY?

16 A. Mr. Finlen's testimony is extremely general in that he
17 states BellSouth provides training to ALECs, BellSouth
18 requires its managers with customer service
19 responsibilities to have a commitment to service equity in
20 their performance plans, BellSouth had several meetings
21 with Supra personnel, and BellSouth publicizes revisions to
22 its procedures, specifications, and services. Supra's
23 amended direct testimony gives examples of the problems
24 Supra has continued to experience with BellSouth that
25 demonstrate that BellSouth's training offerings to ALECs,
26 as well as BellSouth's requirements of its managers and its

1 publications of revisions are inadequate to address the
2 needs of an ALEC and the fostering of local competition.

3 Mr. Finlen states that Supra did not timely pay its
4 bills. I have responded to this allegation in my amended
5 direct testimony.

6 Mr. Finlen admits that BellSouth applies Sections
7 A2.3.8A and A2.3.8B of its General Subscriber Services
8 Tariff just as Supra has described.

9 Mr. Finlen simply denies Supra's allegations that
10 BellSouth's customer service representatives have said
11 inappropriate statements to Supra customers. My amended
12 direct testimony and that of Mr. Bradford Hamilton has
13 given specific examples of such statements.

14 In summary, BellSouth's direct testimony has not
15 addressed Supra's allegations in any serious manner.

16

17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18 A. Yes.