1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   REBUTTAL TESTIMONY OF DAVID A. COON

3   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4   DOCKET NO. 990149-TP

5   May 4, 1999

6

7 Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH

8   BELLSOUTH TELECOMMUNICATIONS, INC.

9

10 A. My name is David A. Coon. My business address is 675 West

11   Peachtree Street, Atlanta, Georgia 30375. I am Director -

12   Interconnection Services for BellSouth Telecommunications, Inc.

13   ("BellSouth") and am responsible for managing certain aspects of

14   BellSouth's performance measurements.

15

16 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

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18 A. The purpose of my testimony is to respond to the direct testimony of

19   MediaOne witness Gary Lane in Florida Docket No. 990149-TP as it

20   relates to Local Number Portability (LNP) performance measures.

21

22 **I. ADDITIONAL PERFORMANCE MEASUREMENTS.**

23

24 Q. ON PAGE 4 OF HIS TESTIMONY, MR. LANE ALLEGES THAT

25   BELLSOUTH PROPOSES TO MEASURE LOCAL NUMBER

1   PORTABILITY ONLY IN THE CONTEXT OF A CUSTOMER

2   CONVERSION ASSOCIATED WITH THE PURCHASE OF

3   UNBUNDLED LOOPS BY AN ALEC. IS THIS TRUE?

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5 A. No. In my direct testimony I indicated that based on the desire of

6   MediaOne and other ALECs to have performance reports that measure

7   LNP as a standalone service separate from the loop, BellSouth has

8   begun investigating the requirements to develop LNP measurements

9   with implementation during the second half of 1999. LNP Firm Order

10   Confirmation (FOC) is one of the measures being investigated.

11

12 Q. DO YOU AGREE WITH MR. LANE'S ASSERTION ON PAGES 5 AND

13   6 THAT THERE IS AN INDUSTRY STANDARD TO UPDATE THE

14   BELLSOUTH LOCAL SERVICE MANAGEMENT SYSTEM (LSMS)

15   WITHIN 15 MINUTES?

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17 A. No. This is an Industry targeted goal and not a standard. It assumes

18   all network components, including links between the Number Portability

19   Administration Center (NPAC), the LSMS gateway, the AIN SMS, and

20   the SCP LNP applications, are fully operational. BellSouth supports

21   the 15 minute target and will do everything possible to achieve that

22   goal. However BellSouth does not control all of the links associated

23   with LSMS functionality. As a result, BellSouth cannot accept end-to-

24   end responsibility for achieving the 15 minute goal.

25

1 Q. DO YOU AGREE THAT THE BELLSOUTH LSMS SHOULD BE

2 UPDATED WITHIN 15 MINUTES AS MR. LANE ASSERTS ON

3 PAGES 5 & 6 OF HIS TESTIMONY IN THE SECTION ENTITLED

4 UPDATE OF THE BELLSOUTH LOCAL SERVICE MANAGEMENT

5 SYSTEM (LSMS) WITHIN 15 MINUTES?

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7 A. The industry targeted goal for activating portability for subscribers is

8 within 15 minutes after the record is downloaded from the NPAC.

9 BellSouth agrees that the industry targeted goal of 15 minutes is

10 reasonable assuming the links to the NPAC and all other required

11 network components are fully operational. However, as stated above

12 the activation process includes downloading records from NPAC to the

13 LSMS, the AIN SMS, and SCP LNP applications. Thus, BellSouth does

14 not control the entire process and, therefore, cannot guarantee that a

15 15-minute interval will always be met.

16

17 BellSouth currently does not measure activation since this is an

18 electronic flow through process. Under normal conditions, activation

19 should occur well within the targeted goal of 15 minutes. Regardless of

20 this fact, BellSouth will investigate system enhancements required to

21 measure this system to system flow through interval.

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23 Q. HOW DO YOU RESPOND TO MR. LANE'S REQUEST FOR

24 PERFORMANCE MEASURES ON PAGE 6 IN THE SECTION

25 ENTITLED GENERAL AVAILABILITY OF THE LSMS SYSTEM?

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2 A.   As discussed on pages 2 and 3 above, LSMS functionality is

3   dependent upon links which are not in the control of BellSouth.

4   However BellSouth is evaluating if the limited portions of LSMS

5   functionality under the control of BellSouth can be made a separate

6   performance measurement.

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8 Q.   DOES THIS CONCLUDE YOUR TESTIMONY?

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10 A.   Yes

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